Special Education Review
Frederick County Public Schools

July 2023 – Final Report

PUBLIC CONSULTING GROUP

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I. INTRODUCTION AND METHODOLOGY

Purpose of the Study

In December 2022, Frederick County Public Schools (FCPS) engaged with Public Consulting Group LLC (PCG) to conduct an independent review of its special education services. This report describes the current state of the special education program in FCPS and is designed to guide the District toward continuous improvement.

The study examined the following guiding questions by category:

Learning Environment and Specialized Services

1. How is the District's continuum of services organized to support a Free Appropriate Public Education (FAPE) for students with disabilities? To what degree do students have access to the general education curriculum? How are inclusive practices employed?

2. To what extent is there disproportionate representation?

3. What are current behavioral practices?

4. Specifically, how do the following specialized programs operate?
   a. Specialized self-contained, Transportation and facilities

Family and Community Engagement

5. To what extent are parents/guardians of children with Individualized Education Programs (IEPs) satisfied with their child's educational program?

Human Capital

6. How does FCPS organize and utilize human capital resources, and what staffing services are required to support the special education program Pre-K to graduation?

Systems and Structures

7. How does FCPS allocate financial resources in a way that facilitates maximum student outcomes, and how is data used to support decision making?

8. What is the appropriate organizational structure for FCPS?

High Expectations

9. To what extent does FCPS implement a rigorous process to systematically monitor educational benefit? How do IEP teams determine services and placement?

Leadership

10. How does FCPS organize leadership to support special education and foster a culture that is focused on improving outcomes and post-secondary preparation?

The recommendations in this report focus on priority areas that emerged from the data collection and include action steps to support overall planning in support of increased access for students with disabilities to high-quality instructional programming.

Methodology

Over the course of the 2022-23 school year, PCG conducted a mixed-methods study of the special education program in FCPS. The findings and recommendations related to programs, policies, and practices resulted from a comprehensive analysis of several data sources. Sources included **1) Data**

and Document Analysis, 2) Organizational Focus Groups and Interviews, 3) Student File Review Focus Groups and Independent IEP Review, 4) a Staff Survey and a Parent Survey, and 5) School Visits. These components were drawn from **Research and Practice Literature** to inform the findings and recommendations. PCG used publicly available achievement and financial information to compare key FCPS statistics against local district, state, and national data. The method and sources of data are triangulated to increase the validity of the conclusions, in this case, program implementation, identification of gaps, and recommendations for the continued improvement of FCPS's special education programs and services.

Details of each data source are included below.

Data and Document Analysis

Population Trends, Programs, and Achievement and Outcomes Analysis

As part of this review, PCG analyzed special education population trends, programs, and achievement outcomes. Through analysis of assessment data, educational setting data, and other indicators, the team compared student identification rates and outcomes by disability, ethnicity, gender, and other demographic variables. Data included in the report also compares students with IEPs to their general education peers.

Staffing Analysis

In partnership with the Council of the Great City Schools, PCG has compiled special education staffing ratios from 89 other school districts (very large to very small) nationwide. The district's staffing ratios were incorporated into these data to consider FCPS staffing information in a broader context. Staffing comparison data have been used to evaluate the extent to which staff roles, responsibilities, and training are aligned to FCPS's expectations.

Document Review

PCG analyzed over 200 documents for information related to district and school structures, programs, policies, and practices. The documents were coded for themes aligned to the focus group and interview findings. Documents reviewed were in the following general categories:

- Organizational structure, staffing, and resource allocation
- Description of academic programs, services, interventions, and activities
- Documents regarding instruction and professional learning
- District procedures and guides, including improvement plan
- Compliance and due process complaints
- Fiscal information

Organizational Focus Groups

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

Focus groups generally consisted of 10-12 participants, while interviews ranged from 1-3 participants. Except in rare circumstances, supervisors did not participate in the same focus group or interview sessions with their staff members to give all staff an opportunity to speak candidly and honestly. PCG provided a sample schedule and a list of positions required to participate. In total, PCG held 87 focus groups and interviews, with 255 stakeholders participating. These sessions occurred from February 2023 to March 2023.

Narrative data from these sessions were analyzed using qualitative data analysis strategies. Specifically, a two-cycle coding methodology was implemented to identify "themes" and "sub-themes" from the data.

Student File Review

Focus Groups

PCG also conducted student-centered file review focus groups that allowed for conversation about school-based practices and included a review of a variety of student documents, specifically eligibility documentation, IEPs, and student progress reports. Through this record review, PCG focused on several topics related to special education management, student identification, programs and services, curriculum and instruction and staffing, and parent engagement, while addressing specific process questions about the development of IEPs, their implementation, and documentation. Student records were selected at random and included a wide cross-section of schools, ages, gender, and disability categories. FCPS staff provided access to the relevant documents associated with the selected students, including the most recent IEP and progress report, and provided copies for discussion via the district's internal email system.

In total, PCG held four student file review focus groups, with 22 stakeholders participating. Focus groups were held after school to allow for maximum attendee participation and minimal disruption to teaching.

Independent IEP File Review

Upon discussion with FCPS, PCG reduced the number of planned student file review focus groups and instead, conducted an independent, virtual IEP review. The protocol used for this review mirrored that of the focus group protocol.

In total, seventy-five files were reviewed following PCG's Golden Thread protocol, which focused on present levels, goals, services and placement, and progress, through the focus groups and independent file review. Additional information about the structure of the Golden Thread protocol can be found later in the report.

Staff and Parent Surveys

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

Survey Items

Survey content was drawn from the research and practice literature in special education and clustered to acquire data from each stakeholder group regarding the extent to which these groups perceived that policies and practices shown in the literature to support effective programming, parent involvement, and positive results for students with disabilities were evident in FCPS.

FCPS reviewed the survey content to verify their relevance and add items where appropriate. The survey incorporated five-point rating scales, yes/no questions, and included open-ended text areas. For reporting purposes, the five-point rating scale was consolidated into three categories: agree (which includes strongly agree and agree), disagree (which includes strongly disagree and disagree), and don't know or not applicable (where this option was provided to respondents).

Survey Process and Analysis

PCG worked collaboratively with FCPS to facilitate a survey process that would result in the highest possible rate of return. To encourage participation, all parents of students with an IEP were informed of the purpose of the survey and provided with instructions for accessing the survey through Find out First notifications, including reminder notifications. The parent survey was translated into Spanish. All staff were sent an email invitation to participate in the survey and were sent reminder emails to participate.

A total of 460 parents who received the survey completed portions of the survey online, representing a response rate of 9 percent. A total of 1,092 staff responded to the online staff survey, representing a

response rate of 36%. Select survey responses appear within the main body of the report to support findings from specific topics.

School Visits

In February 2023, PCG visited 19 FCPS schools over the course of four days, observing approximately five to six classrooms at each school for a total of 102 classes. To select those designated for visits, PCG requested a list of classrooms in which there were students with IEPs and the level, subject area, and placement designation. The intent was to ensure that all placement settings were represented.

PCG's School Observation protocol was designed to collect qualitative information about the school building as a whole and in individual classrooms. It focused on three key areas: 1) Safe and Accessible Environment, 2) Functions and Elements of Explicit Instruction, and 3) Specially Designed Instruction. PCG observed all instructional/service delivery settings (e.g., co-taught classes, specialized programs) across a wide representation of grades. The overall school environment, including non-instructional spaces such as the lunchroom, office, and hallways, was also observed.

The resulting data from all school visits are categorized and aggregated to inform impressions of the special education district-wide system and indicate areas in which professional learning in special education practices may be considered. Using aggregated data across classroom level and type adheres to the agreement to not identify specific schools or staff.

Special Education Effectiveness Domains

Building on extensive research and our collective experience and expertise serving school districts and state departments of education nationwide, PCG has developed the Special Education Effectiveness Framework to assist school districts in catalyzing conversations about, and reviewing and improving the quality of, their special education programs.[1] It is designed to provide school district leaders with a set of practices to strengthen special education services and supports, to highlight the multidisciplinary, integrated nature of systemic improvement, and to clearly establish a pathway for districts to move toward realizing both compliance and results. An intentional focus on improving outcomes for students with disabilities leads to improved outcomes for ALL students.
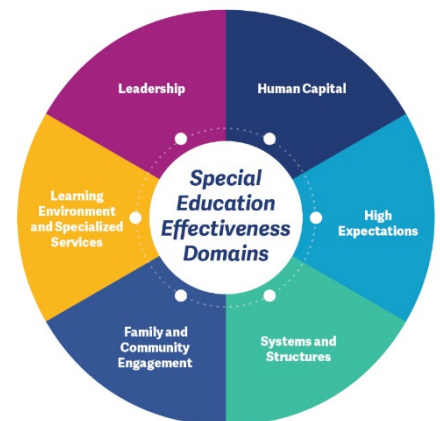
When implemented with a systems-thinking approach, the six domains of our Special Education Effectiveness Framework help superintendents and district leaders improve educational and functional outcomes for students with disabilities.

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

Terminology

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

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

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

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

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

Students Receiving Special Education Services. References are made to students receiving special education services. They will also be referred to as students with Individualized Education Programs (IEPs) or students with disabilities (SWDs). The terms are intended to be interchangeable. This categorization does not include students with disabilities who have 504 Plans.

II. EXECUTIVE SUMMARY

Frederick County Public Schools (FCPS) is situated in the fast-growing area of Frederick County, Maryland. Like other outlying sections of the Washington Metropolitan area, Frederick County has experienced a rapid population increase in recent years. The population has increased by over 15,000 residents, from 271,709 in 2020 to 287,079 in 2022.[2] Similarly, the District's student population has risen from 42,700 students in the 2018-19 school year to 46,899 in the 2022-23 school year. FCPS is one of the largest school districts in the United States, ranking 116th in size as of 2019 demographic data,[3] and the County has a total area of 667 square miles. This rapid increase in the student population is filling many schools to capacity, necessitating ongoing conversations about facilities and programming offerings across its 69 schools and large geographic region.

FCPS consists of 69 schools serving over 46,000 students from pre-kindergarten through 18-21 programming. It boasts a team of over 7,000 employees, of which 400 are special education teachers and over 700 are special education instructional assistants.[4] There are 38 elementary schools serving over 20,000 K-5 students, 13 middle schools serving 10,000+ students in grades 6-8,and 10 high schools serving over 14,000 high school students. The District also has one alternative school, one special education school, a secondary transition program one virtual school, in addition to four charter schools and one career and technology center.

Over the years, the classification rate of students with disabilities in FCPS has remained relatively stable, averaging between 10 and 11 percent over the past four years.

In recent years, FCPS have achieved notable accomplishments, including:

- Exceeding Maryland averages with scores that consistently surpass national averages on the College Board SAT.
- On a 1-5 star scale, 50 of 58 state-rated schools achieved 4 or 5 stars, and none received fewer than 3.
- FCPS's Class of 2020 graduation rate was 92.4% (compared to Maryland's 86.8% average), while the dropout rate was 4.0% (compared with the state's 8.3%).
- Students in the class of 2021 received $62 million in scholarship offers.
- The report cards show that FCPS ranks in the top third in the state in overall student performance.[5]
- Received a Meets Requirements designation under the special education State Performance Plan.

Through information gathered from interviews, focus groups, and surveys for this report, it has become evident that the District's staff and teachers deserve praise for their outstanding contributions to education. Their commitment to collaboration with both students and parents stands out as a strength. Teachers actively strive to create supportive learning environments where students feel valued and safe. Moreover, they display an eagerness to engage in continuous professional learning, seeking opportunities to enhance their teaching practices and refine their craft. This dedication to ongoing growth and improvement underscores the teachers' commitment.

Further, as evidenced by this program review and the facilitation of the community Blue Ribbon Task Force, FCPS is open to self-reflection and improvement. This orientation is especially notable, given the scrutiny the District underwent during the 2020-21 Department of Justice (DOJ) investigation into the use of restraint and seclusion practices for students with disabilities. The investigation left a profound impact on the school staff, especially special educators, school leaders, and special education instructional assistants (SEIAs), and families. The level of distrust, uncertainty, and fear many experienced over the past year is still palpable. Building back trust, a sense of positive

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[2] https://www.census.gov/data/tables/time-series/demo/popest/2020s-counties-total.html
[3] https://nces.ed.gov/programs/digest/d21/tables/dt21_215.30.asp
[4] https://www.fcps.org/about/fast-facts
[5] https://www.fcps.org/about/news/1761742/local-schools-perform-well-on-state-report-cards

collaboration between school staff, leaders, and parents, and a proactive momentum of holistic improvement will be paramount in the coming years.

This report will address several pressing concerns within FCPS that directly and indirectly impact special education. Some of the key issues include the following.

Continuum of Services

The District has substantially invested in specialized programs for students with significant cognitive and behavioral disabilities, specifically adding sixteen Board Certified Behavior Analyst (BCBA) positions per the requirements of the DOJ settlement and extending special educator and SEIA positions to 11-months to allow for training and planning. These programs are well resourced and structured. There are, however, gaps in support for students with high functioning autism and intensive and specialized academic support for students with disabilities who spend the majority of their day in general education classes.

Behavior Support

Staff expressed concerns about the limited amount of training they have received on how to apply acceptable de-escalation strategies and the increase in intensity of student behavior. Many described feeling uncertain about what strategies are available to them when students are dysregulated and the impact of outbursts on the rest of the students in the classroom or school.

Leadership and Organizational Structure

The recently appointed Acting Associate Superintendent of Special Education and Student Services brings increased visibility of and support for students with disabilities. Feedback solicited during this review highlighted the need for a clearer, more streamlined organizational structure, designed to better support schools and increase responsiveness.

Family Engagement

Partners for Success (PFS) is intended to increase parental involvement in special education and to assist families in resolving concerns, and to provide information about disabilities and community resources. The FCPS community spoke highly of this resource and described the need to expand this type of support through advocacy centers and other training avenues. Having more opportunities for parents to engage, learn, and make connections can only serves to improve trust and the relationship between the community and schools.

Addressing these multifaceted challenges requires a comprehensive and collaborative approach. Stakeholders at all levels must be involved in efforts to improve structural stability, enhance training and data utilization, rebuild trust within the community, and ensure equitable and effective support for students with disabilities. This report aims to provide a detailed analysis of these issues and offer actionable recommendations.

III. State Performance Plan (SPP) and FCPS's Results Driven Accountability (RDA)

Strengths

- **Achievement.** FCPS met or exceeded grade level average for all students and students with IEPs for reading and mathematics across grades three, eight, and ten compared to state averages.
- **Educational Setting.** FCPS educates students with disabilities 80 percent or more of the day in the general education setting at rates higher than the state average.
- **Graduation Rate.** FCPS has higher four-year graduation rates for students with disabilities than the state average by 8.4 percentage points.

Opportunities for Improvement

- **Disability Classification.** FCPS identifies students under the disability category of multiple disabilities at significantly higher rates than both the state and nation.
- **Risk Ratios for Overidentification.** FCPS exceeds the 2.0 threshold for Asian students identified under the disability category of autism (2.46). Hispanic students were also at-risk of meeting the 2.0 threshold under intellectual disability (1.53).
- **SPP Indicator 7.** FCPS consistently did not meet state targets for all preschool indicators.
- **Inclusive Practices.** FCPS placed students with intellectual disabilities in self-contained settings at much higher rates than the state and nation.
- **Dropout Rate.** There has been an increase in the percentage of students with IEPs who are dropping out before graduating high school.

The Maryland State Department of Education (MSDE), Division of Early Intervention and Special Education Services (DEI/SES) is required by the United States Department of Education (USDE), Office of Special Education Programs (OSEP) to make determinations annually regarding the performance of students with disabilities for each local preschool and special education program using one of the following four determination categories: "Meets Requirements," "Needs Assistance," "Needs Intervention," or "Needs Substantial Intervention."[6] The MSDE uses a results-based rubric for indicators to evaluate the performance of each local education agency (LEA) in meeting the State's identified targets. The indicators evaluated are shown in the graphic to the left.

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

For the 2020-21 school year, FCPS received a Results Driven Accountability (RDA) determination of "Meets Requirements" and exceeded the state target across most indicators.

It is important to note that while this accolade for meeting IDEA requirements is to be celebrated and not one that all districts or states achieve, there are limitations to these data. For one, the targets set by states often are a reflection of minimum acceptable levels for each indicator. Further, they reflect aggregate data, which could, for example, mask problematic trends in certain schools. Finally, these data are generally two years old and reflect one point in time. The analysis below provides FCPS with more recent data trends and can be used in a formative and directional capacity.

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[6] 34 CFR §§300.600 and 300.604

A variety of data sources were used to compile the charts in this chapter. They include:

- Some district and state data obtained from MD Report Card[7]
- National data obtained from the National Center for Education Statistics Digest of Education Statistics and OSEP's Grads360 site[8]
- FCPS and State incidence data obtained from the Maryland State Department of Education Staff and Student Publications,[9] and
- 2022-23 District data obtained from FCPS in 2023.

FCPS Special Education Demographics

The following section provides detail on various demographic data for students receiving special education services in FCPS.

As reflected in the figure below, the percentage of FCPS students with IEPs ages 6 through 21 has remained relatively stable from 10.8 percent in 2018-19 to 10.4 percent in 2022-23. These rates have trended below the statewide and national averages for these four comparable years.

The last national data from 2020-21 reported that 13.9 percent of all public-school students had an IEP, a rate that was somewhat higher than both FCPS and Maryland rates.

Exhibit 1. Percentage of FCPS Students with IEPs Compared to State and Nation, 2018-19 and 2022-23
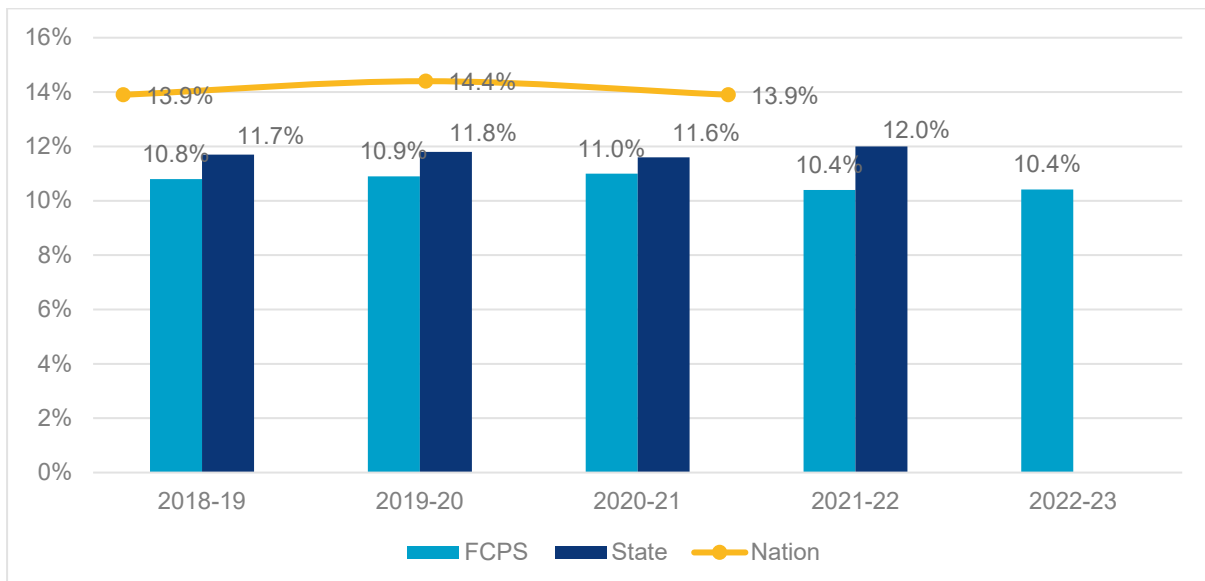
Of comparable Maryland school districts, Howard County had the lowest incidence rate 10.3 percent). This was slightly lower than FCPS' identification rate of 10.4 percent. Four of the five comparable districts had identification rates below the state average of 12.0 percent. Harford County had the highest incidence rate (13.3 percent), exceeding the state average.

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[7] https://reportcard.msde.maryland.gov/
[8] https://nces.ed.gov/programs/digest/; https://osep.grads360.org/services/PDCService.svc/GetPDCDocumentFile?fileId=38707
[9] https://marylandpublicschools.org/about/Pages/DCAA/SSP/index.aspx.

Exhibit 2. FCPS IEP Rates Compared to Other Maryland School Districts and State (ages 6-21), 2021-22
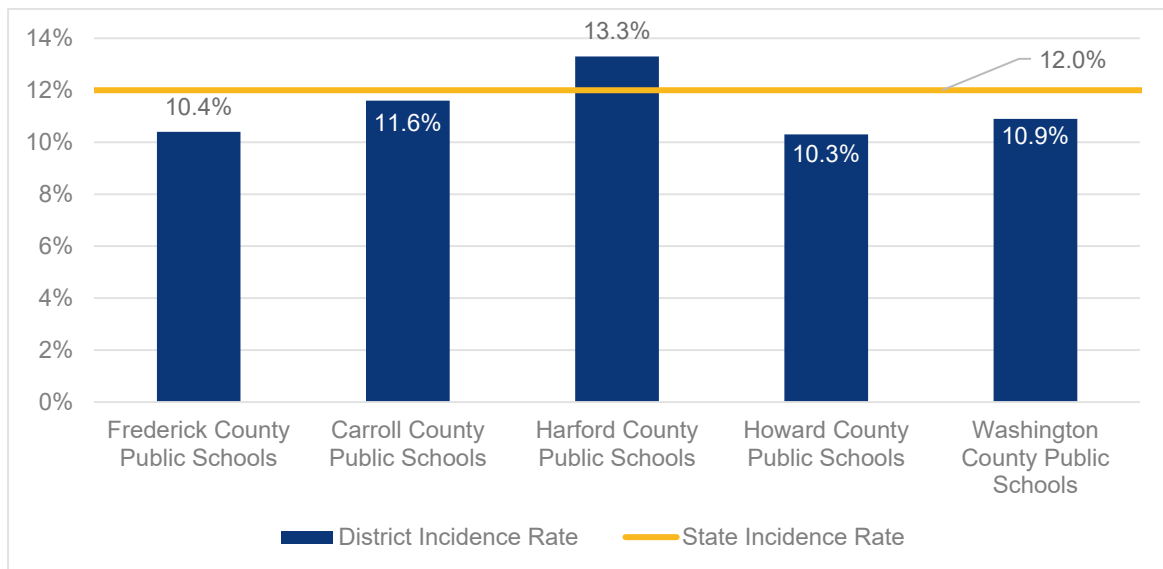
Early Childhood Identification, Achievement & Placement Rates

This section provides information about identification rates by disability area, and by race/ethnicity for children three to five years of age, in addition to early childhood outcomes and educational environments in which students with IEPs learn.

Identification by Disability

Of pre-K students enrolled in FCPS with an IEP, 44.5 percent had a speech/ language impairment, 38.5 percent had a development delay, and 15.2 percent had autism.

Exhibit 3. Percent of FCPS Students (ages 3-5) by Disability, 2022-23
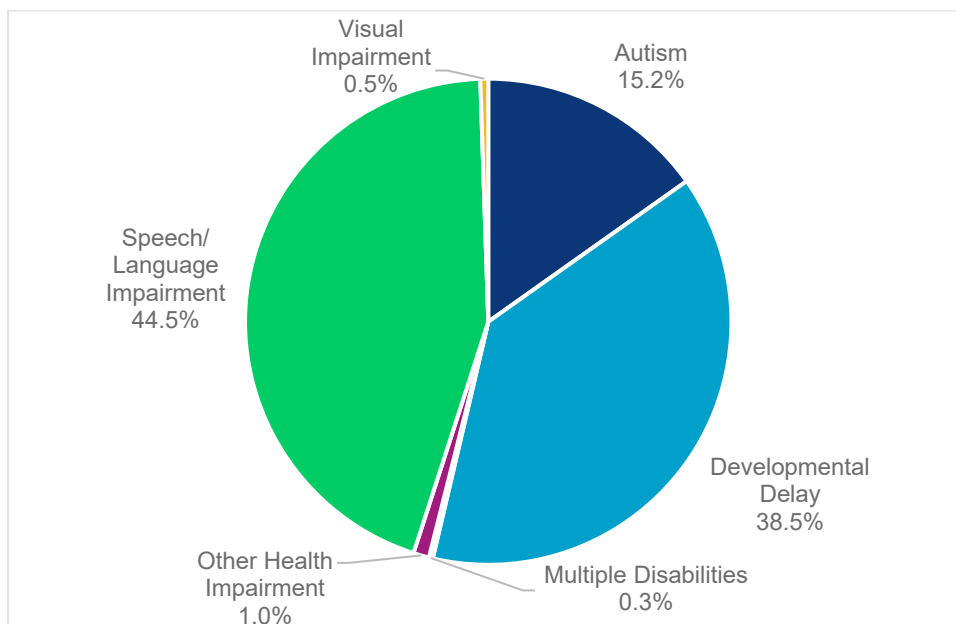
Identification Composition by Race/Ethnicity

The exhibit below shows the composition of all early childhood students eligible to receive special education by race/ethnicity category from ages 3-5. In descending order, the special education

racial/ethnic composition of White students was 43.2 percent, Black or African American students was 24.6 percent, Hispanic students was 21.6 percent, and Asian students was 10.3 percent.

Exhibit 4. Percent of Students with IEPs (ages 3-5) by Race/Ethnicity, 2022-23
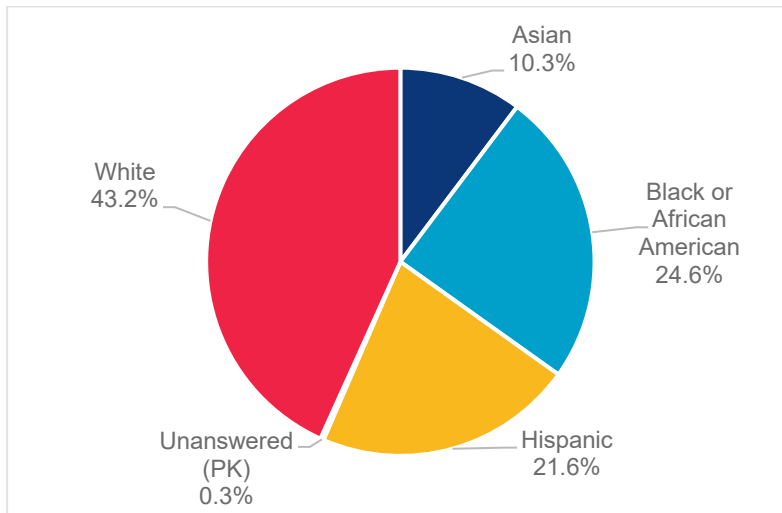
Achievement Outcomes

SPP Indicator 7 relates to the achievement of young children with disabilities in three areas: A) appropriate behavior, B) acquisition and use of knowledge and skills, and C) positive social/emotional skills. In each of these three areas, calculations are made on the percentage of children in the following two areas: (1) children who substantially increased their skills and (2) children functioning within expectations. Summarized below are FCPS's performance ratings for these two areas in each of the three categories (7A-C) between 2017-18 and 2019-20.

Substantially Increased Skills
The first set of indicators are for children who entered an Early Childhood (EC) program below developmental expectations for their age but who substantially increased developmentally by age six when they exited the program.

   a. **Positive Social/Emotional Skills**. FCPS met the state target for all three years and FCPS exceeded the state target by an average of 2.3 percentage points.
   b. **Acquisition/Use of Knowledge/Skills**. FCPS met and exceeded the state target for the past three reporting years, 2017-18 and 2019-20.
   c. **Appropriate Behavior to Meet Needs**. FCPS met the state target for the 2017-18 and 2019-20 school years, exceeding the target by 1 percentage point. FCPS did not meet the state target for the 2018-19 school year, missing the state target by less than a percentage point.

Functioning Within Age Expectations
The second set of indicators is for children who were functioning within expectations by six years of age or had attained those expectations by the time they exited the program.

   a. **Positive Social/Emotional Skills**. Between 2017-18 and 2019-20, FCPS did not meet state targets. In 2019-20, FCPS was 6.5 percentage points below the state target of 53.0 percent.
   b. **Acquisition/Use of Knowledge/Skills**. FCPS did not meet the state target for the previous three school years. In 2019-20, FCPS was 5.5 percentage points below the state target of 51.12 percent.
   c. **Appropriate Behavior to Meet Needs**. FCPS did not meet the state target for the previous three school years. In 2019-20, FCPS was 5.2 percentage points below the state target of 59.48 percent.

Exhibit 5. Preschool Outcomes: Indicator 7a - Positive Social/Emotional Skills (including Social Relationships), FCPS and State Targets, 2018 to 2020

	% entered below age expectations			% functioning within age expectations		
	2017-18	2018-19	2019-20	2017-18	2018-19	2019-20
FCPS Performance	69.90%	70.44%	72.57%	52.25%	49.41%	46.41%
State Target	68.53%	68.78%	68.78%	52.75%	53.00%	53.00%
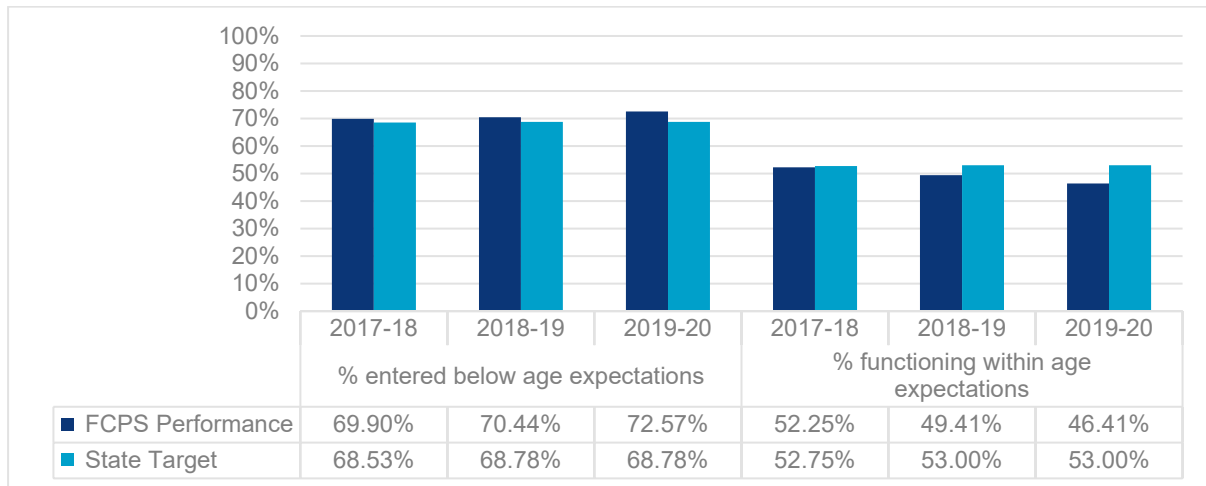
Exhibit 6. Preschool Outcomes: Indicator 7b - Acquisition and Use of Knowledge and Skills (including Early Language Communication and Early Literacy), FCPS and State Targets, 2018 to 2020

	% entered below age expectations			% functioning within age expectations		
	2017-18	2018-19	2019-20	2017-18	2018-19	2019-20
FCPS Performance	72.74%	72.91%	75.89%	49.88%	47.90%	45.55%
State Target	72.37%	72.37%	72.37%	51.12%	51.12%	51.12%
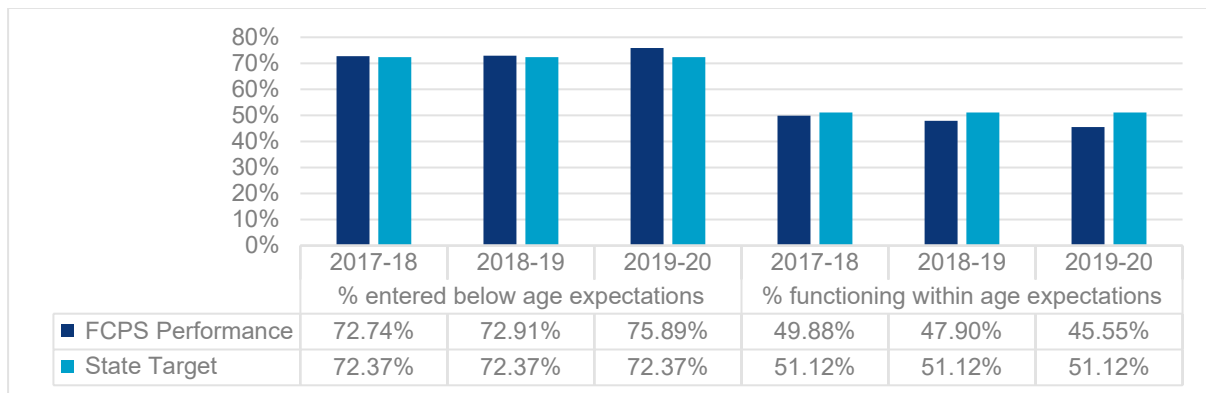
Exhibit 7. Preschool Outcomes: Indicator 7c - Use of Appropriate Behavior to Meet Their Needs, FCPS and State Targets, 2018 to 2020

	% entered below age expectations			% functioning within age expectations		
	2017-18	2018-19	2019-20	2017-18	2018-19	2019-20
FCPS Performance	72.58%	71.14%	72.84%	58.40%	56.71%	54.26%
State Target	71.65%	71.65%	71.65%	59.48%	59.48%	59.48%
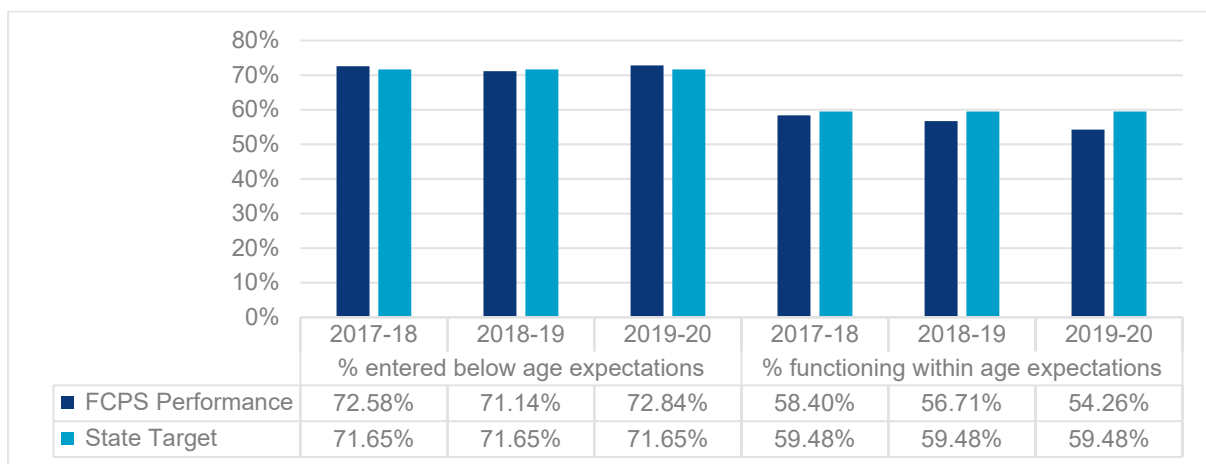
Educational Placements

Of students ages 3-5 in FCPS with an IEP, 81.6 percent spent the majority of their school day in a regular early childhood program.

Exhibit 8. Percent of FCPS Students with an IEP (ages 3-5) by Education Setting, 2022-23
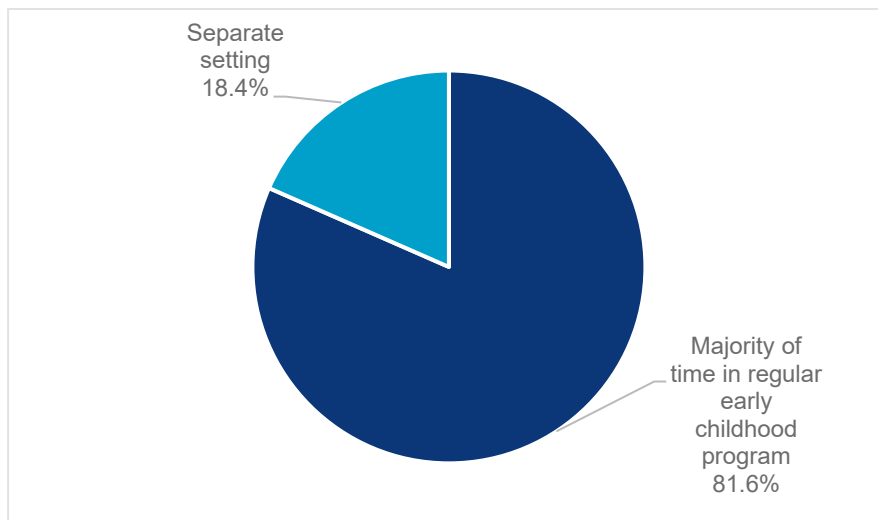
School-Aged Students: Identification, Achievement & Placement

Identification by Disability Category: District, State, and Nation

When compared to the state and nation, FCPS had significantly lower rates of students identified with a specific learning disability (SLD), 23 percent, than the national average, 32.7 percent, and the state average of 26 percent. The same was true for other health impairments (OHI), in which FCPS had a much lower percentage (12.5%) than the state (17.2%) and slightly lower than the national average (15.3%). However, for multiple disabilities, FCPS had a significantly higher rate, 18.3 percent, than both the state, 6.7 percent, and national average, 1.8 percent. For speech and language impairments, FCPS had a higher rate (20.8%) than both the state (14.1%) and national (18.9%) averages.

It is important to note that under IDEA, "multiple disabilities mean concomitant impairments (such as intellectual disability-blindness, or intellectual disability-orthopedic impairment), the combination of which causes such severe educational needs they cannot be accommodated in special programs solely for one of the impairments. Multiple disabilities do not include deaf-blindness."[10] Based on this definition, it would appear FCPS may be misusing the multiple disabilities designation and overidentifying students under this designation.

Exhibit 9. Composition of Identified Students by Disability Category for FCPS, State, and Nation

	All disabilities	Autism	Emotional Disability	Intellectual Disabilitiy	Multiple Disabilities	Other Health Impairment	Specific Learning Disability	Speech or Language Impairments
FCPS	15.0%	12.4%	3.9%	2.7%	18.3%	12.5%	23.0%	20.8%
State	11.6%	12.8%	4.5%	5.3%	6.7%	17.2%	26.0%	14.1%
Nation	13.9%	11.5%	4.9%	6.0%	1.8%	15.3%	32.7%	18.9%

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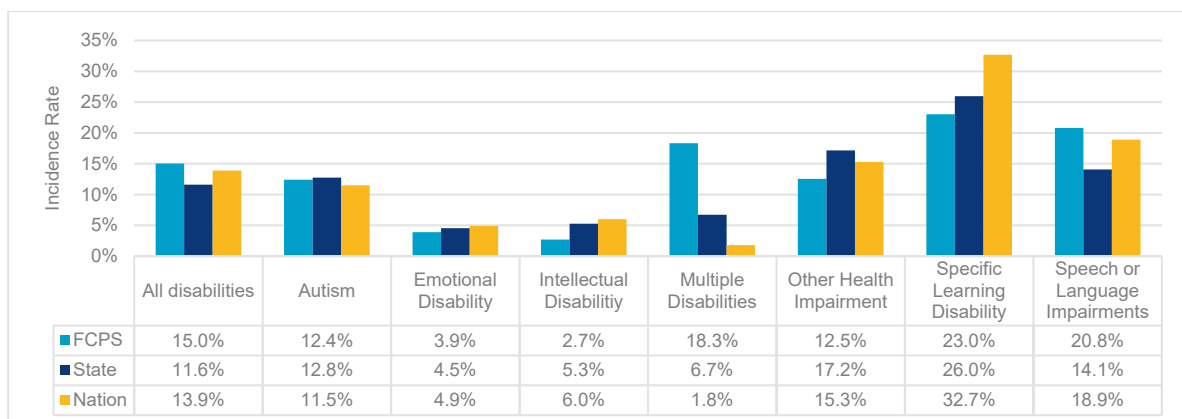
[10] IDEA (2004) [Sec 300.8(c)(7)](#)

Identification by Grade

The exhibit below displays the composition of all identified students by grade. These data show the highest number of students with IEPs in PK and grades 6, 9, and 12.

Exhibit 10. Number of Students with IEPs by Grade, 2022-23
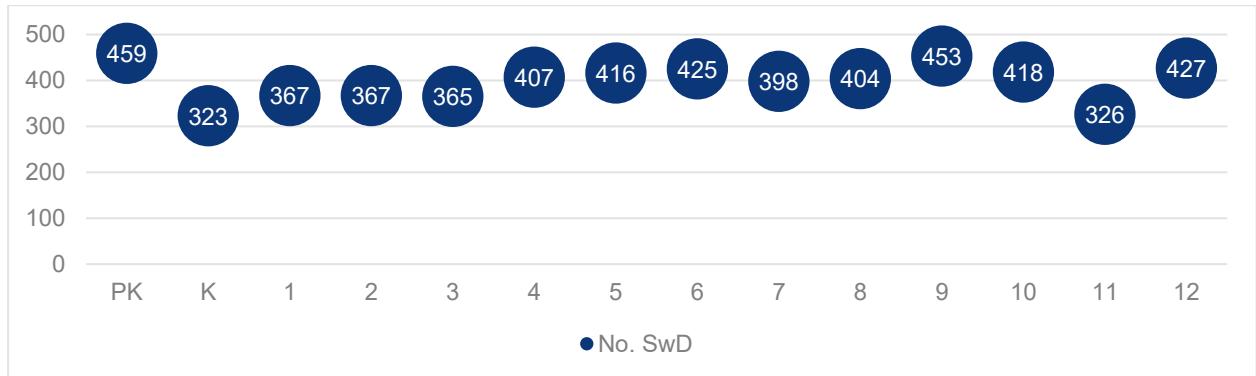
Identification by Race/ Ethnicity

The exhibit below shows the composition of each racial/ethnic group of identified students based on associated total enrollments for each group. Of the students identified with an IEP:

- 18.9 percent were Hispanic, lower than the percentage of students identified as Hispanic in the District (19.9%).
- 21 percent were Black or African American, higher than the percentage of students identified as Black or African American in the District (16.7%).
- 54.1 percent were White, slightly higher than the percentage of students identified as White in the District (52.1%).

Exhibit 11. Percent of FCPS Students with IEPs (ages 6-21) by Race/Ethnicity, 2022-23

	American Indian or Alaskan Native	Asian	Black or African American	Hispanic	Native Hawaiian or Pacific Islander	White
Students w/ IEP	0.9%	4.9%	21.0%	18.9%	0.2%	54.1%
All Students in FCPS	0.8%	10.3%	16.7%	19.9%	0.2%	52.1%
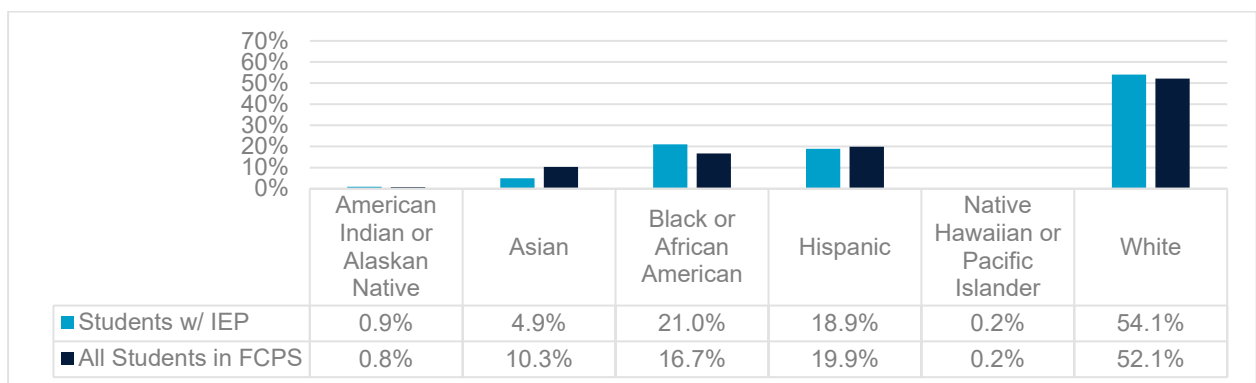
The exhibit below compares the percentage of students with an IEP by disability category and race/ethnicity. Data indicated the prevalence of disability types mostly aligned with District demographics, with variations in some disability categories. Key differences, displayed in the graph below include:

- Hispanic students accounted for 26.3 percent of students with an intellectual disability and 25.1 percent of students with a specific learning disability, higher than the overall percentage of Hispanic students with an IEP (18.9%).
- Black or African American students accounted 25.5 percent of students with emotional disabilities and 22.5 percent of students with other health impairments, higher than the overall percentage of Black or African American students with an IEP (21.0%).
- Asian students accounted for 11.3 percent of students with autism and 7.2 percent of students with speech or language impairments, higher than overall the percentage of Asian students with disabilities (4.9%).

- White students accounted for 57.4 percent of emotional disabilities, 59.6 percent of multiple disabilities, 57.6 percent of other health impairments, and 56.9 percent of students with speech or language impairments, higher than the overall percentage of White students with a disability (54.1%).

Exhibit 12. Percentage of FCPS Students (ages 6-21) by Disability Category and Race/Ethnicity[11]

	All SwD	Autism	Emotional Disability	Intellectual Disability	Multiple Disabilities	Other Health Impairment	Specific Learning Disability	Speech or Language Impairment	Other
■ White	54.1%	47.5%	57.4%	51.9%	59.6%	57.5%	50.6%	56.9%	43.9%
■ Two or more races	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
■ Native Hawaiian or Pacific Islander	0.2%	0.1%	0.0%	0.0%	0.4%	0.1%	0.1%	0.1%	0.0%
■ Hispanic	18.9%	17.9%	13.0%	26.3%	14.2%	15.4%	25.1%	17.5%	25.8%
■ Black or African American	21.0%	21.8%	25.5%	18.8%	21.4%	22.5%	21.1%	17.2%	24.4%
■ Asian	4.9%	11.3%	4.2%	3.1%	3.4%	3.3%	2.2%	7.2%	5.9%
■ American Indian or Alaska Native	0.9%	1.3%	0.0%	0.0%	1.0%	1.2%	0.9%	1.1%	0.0%

Risk Ratio for Identified Students by Race/Ethnicity and Disability

As required by the IDEA, the Maryland State Department of Education (MSDE) monitors school districts for significant disproportionality using a risk ratio to measure the extent to which each racial/ethnic group is more likely than others to be identified for special education.

As the exhibit below shows, Black or African American students are identified as having an emotional disability at a rate of 1.71. While this does not meet the 2.0 risk ratio identified as significant disproportionality, this is an area to closely examine within FCPS as the district is very close to meeting the threshold for disproportionality in this area.[12]

Exhibit 13. Risk Ratios by Race/Ethnicity and Disability, 2022-23

	Autism	Emotional Disability	Intellectual Disability	Multiple Disabilities	Other Health Impairment	Specific Learning Disability	Speech/ Language Impairment
■ Asian	1.11	0.38	0.28	0.31	0.29	0.20	0.68
■ Black or African American	1.39	1.71	1.15	1.36	1.45	1.34	1.04
■ Hispanic	0.88	0.60	1.44	0.67	0.73	1.36	0.86
■ White	0.83	1.24	0.99	1.35	1.24	0.94	1.21

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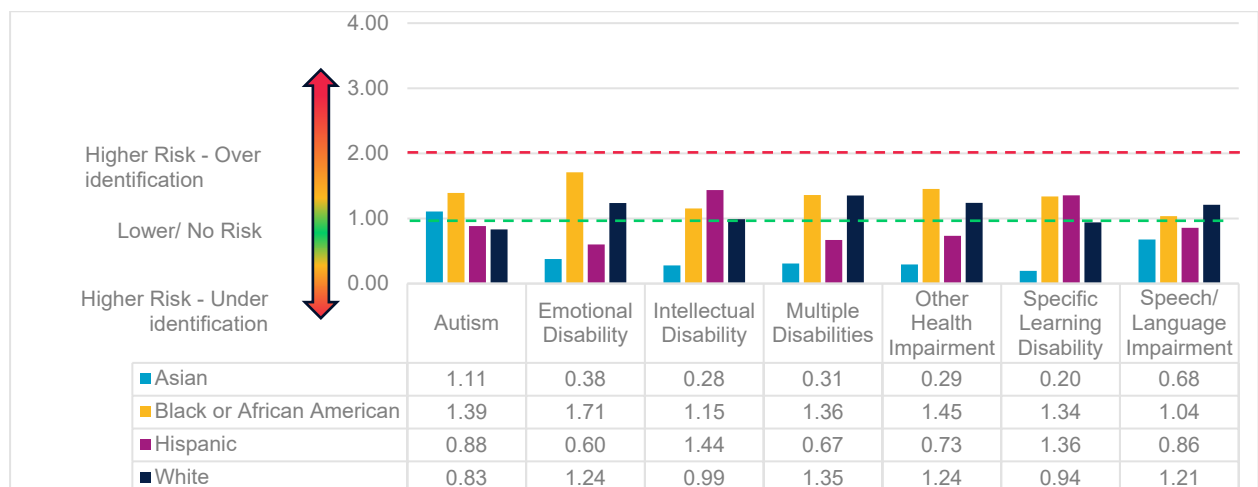
[11] Other includes the following disability classifications: Deafness, Hearing Impairment, Visual Impairment, Orthopedic Impairment, Deaf-Blindness, and Traumatic Brain Injury.
[12] Per COMAR, the Risk Ratio Threshold is 2.0. If a LEA has a risk ratio above this number, it may be identified as having significant disproportionality: https://www.marylandpublicschools.org/stateboard/Documents/12052017/TabJ-13A.05.02.04StateAdministration.pdf

Identification by Gender

Of all FCPS students, 51.1 percent were male, and 48.9 percent were female. Of all students with IEPs, 67 percent were male, and 33 percent were female.

The following disability categories had higher percentages of males than the overall IEP average: autism (81.9%), other health impairment (72.8%), and speech/language impairment (67.8%).

When compared to the overall percentage for female students with an IEP, these areas exceeded the average: emotional disability (39.4%), multiple disabilities (34.2%), and specific learning disability (41.6%).

Exhibit 14. Percentage of FCPS Students with Disabilities by Gender and Disability, 2022-23[13]
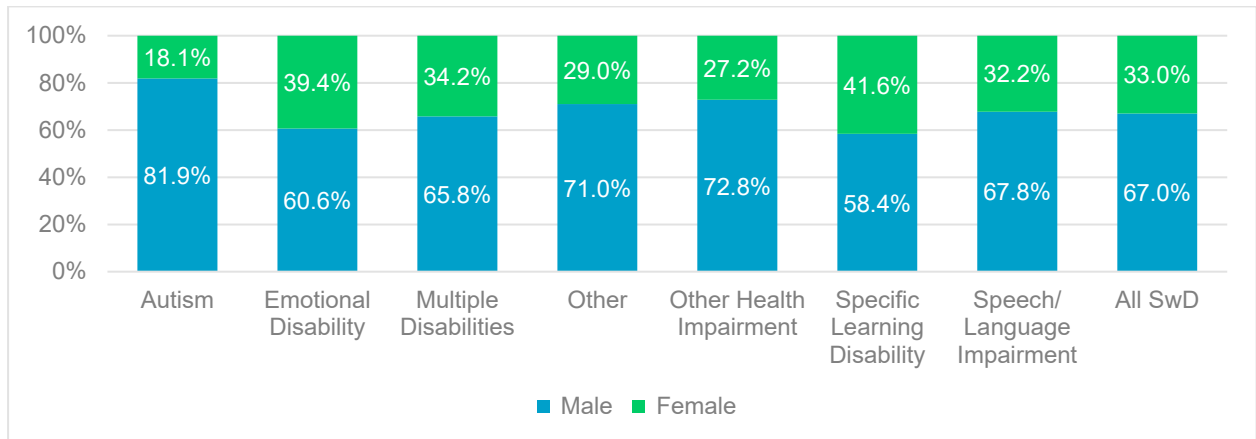
Identification by Emerging Bilingual (English Learner) Status

In 2022-23, 6.3 percent of students in FCPS were identified as Emergent Bilingual. Of the students with IEPs, 6.7 percent were identified as Emergent Bilingual.

Exhibit 15. Percentage of FCPS Students with IEPs (ages 6-21) Identified as an Emergent Bilingual Compared to All Students, 2022-23
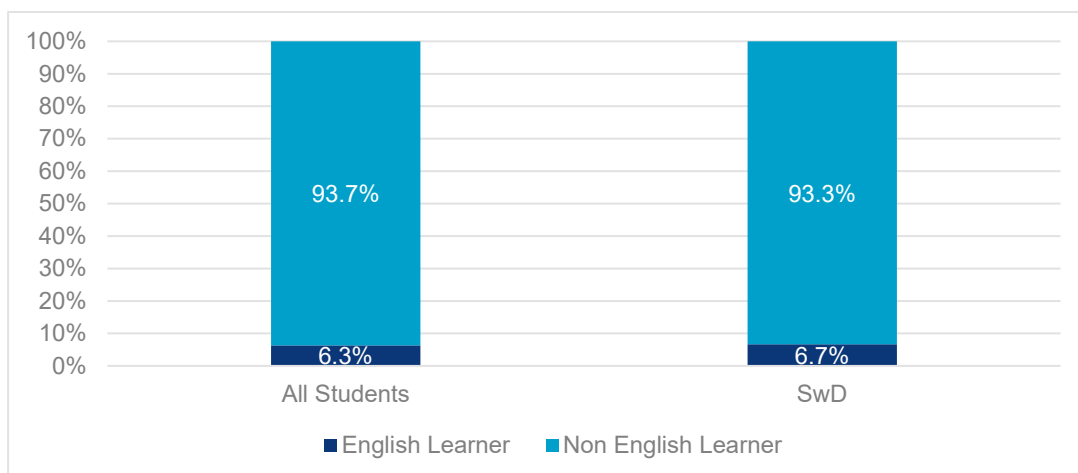
Of the students with IEPs who were identified as an Emergent Bilingual:

- 38.2 percent had a primary disability classification of specific learning disability
- 22.3 percent had a primary disability classification of speech and language impairment
- 10.1 percent had a primary disability classification of autism

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[13] Other includes the following disability classifications: Deafness, Hearing Impairment, Visual Impairment, Orthopedic Impairment, Deaf-Blindness, and Traumatic Brain Injury.

- 8.7 percent had a primary disability classification of other health impairment
- 1.7 percent had a primary disability classification of intellectual disability, and
- 1.4 percent had an emotional disability.

Exhibit 16. Percentage of Student with IEPs (ages 6-21) Identified as Emergent Bilingual by Primary Disability, 2022-23
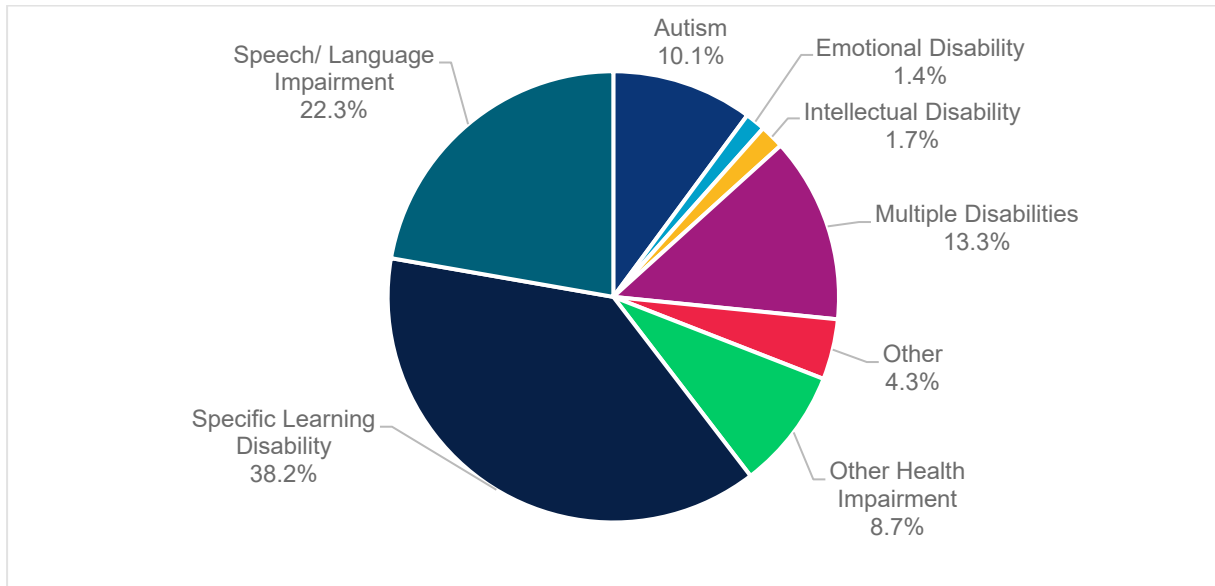
The following disability categories had a higher percentage of students identified as Emergent Bilingual than all students with IEP average (6.7%): specific learning disability (10.4%) and speech and language impairment (8.6%).

Exhibit 17. Percentage of Students with an IEP (ages 6-21) by Primary Disability Classification and Emergent Bilingual Status, 2022-23

	Autism	Emotional Disability	Intellectual Disability	Multiple Disabilities	Other	Other Health Impairment	Specific Learning Disability	Speech/ Language Impairment	All Disabilities
Non-ELL	94.9%	97.7%	96.3%	95.7%	93.2%	95.5%	89.6%	91.4%	93.3%
ELL	5.1%	2.3%	3.8%	4.3%	6.8%	4.5%	10.4%	8.6%	6.7%
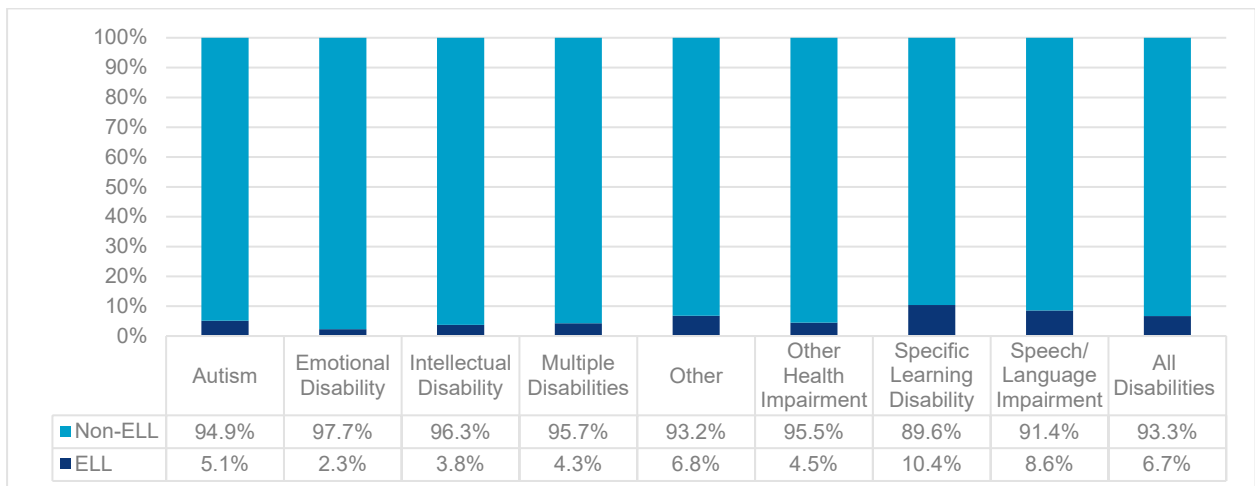
Identification by Free and Reduced Lunch Status

Overall, 32.2 percent of students in FCPS were enrolled in the free and reduced lunch meals (FARMs) program. Of the students with an IEP, 42.1 percent were enrolled in the program.

Exhibit 18. Percentage of FCPS Students with Disabilities (ages 6-21) Enrolled by Free/Reduced Lunch Eligibility Compared to All Students, 2022-23
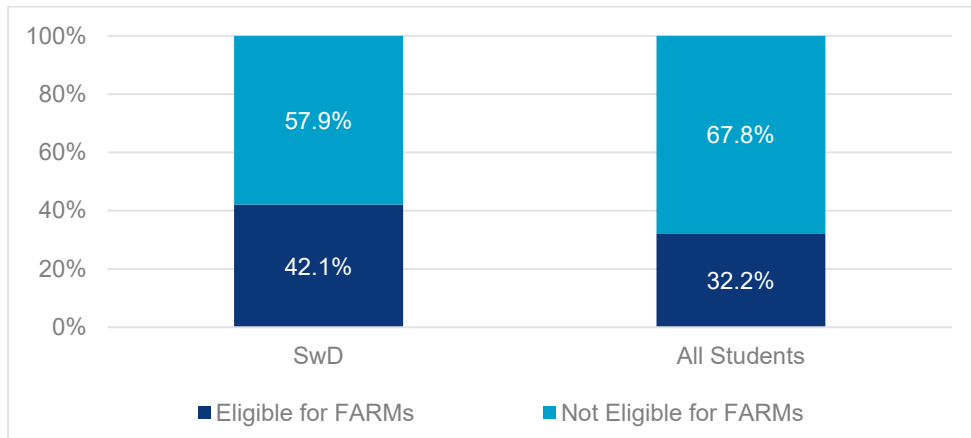
Achievement Outcomes

This section provides a longitudinal analysis of outcomes for school-aged students and those receiving special education based on the following: Maryland School Assessment (MSA), graduation rates, and dropout rates.

It should be noted that this review uses 2021-2022 MSA assessment data. This assessment was given in the fall of 2022, six months after instruction. The assessment was shorter in length and shifted from five levels to three levels. These factors should be considered when interpreting the charts below.

Reading

Due to COVID-19, the MSA was not administered for 2020. As such, the charts below show available data for 2017, 2018, 2019, and 2021.

Grade 3. Between 2017-2021, the percentage of FCPS students who met or exceeded grade level reading for grade three was higher than the state average. During the same time, the percentage of students with disabilities who met or exceeded grade level reading for grade three was higher than the state rate for students with disabilities. Between 2017 and 2021, the achievement gap between all FCPS students without IEPs and those with IEPs averaged 35 percentage points.

Exhibit 19. Percent of Students Who Met/Exceeded Grade Level Reading for Grade 3, 2017-2021

	2016-17	2017-18	2018-19	2021-22
State Proficient - All Students	39.8%	38.8%	41.2%	45.8%
State Proficient - SwD	10.4%	9.7%	10.8%	15.6%
FCPS Proficient - All Students	49.8%	49.5%	51.5%	54.8%
FCPS Proficient - SwD	15.5%	15.5%	15.2%	18.2%
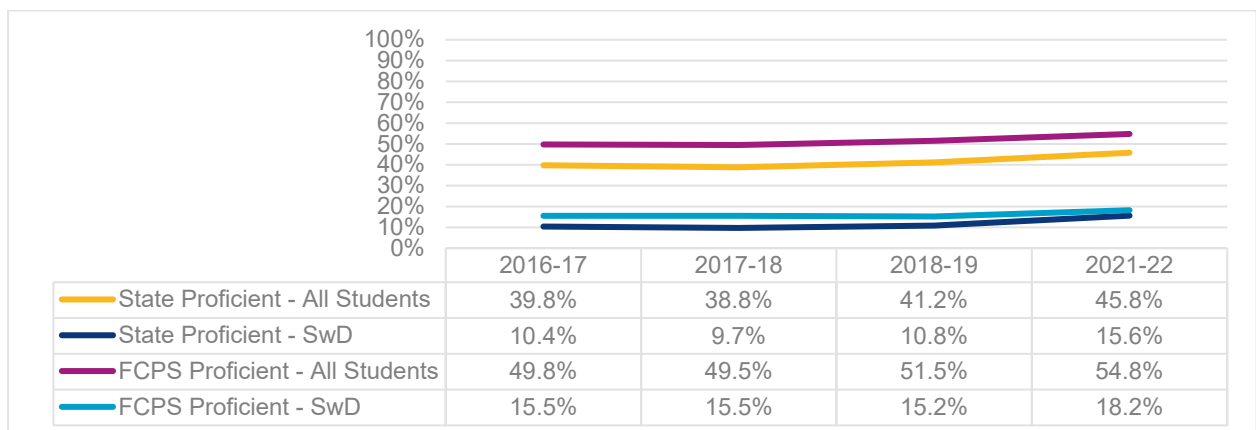
Grade 8. Similar to grade three, between 2017 and 2021, the percentage of all FCPS students who met or exceeded grade level reading for grade eight exceeded the state target. Similarly, students with IEPs at FCPS performed higher than the state rate for students with disabilities. The

achievement gap between all FCPS students and students with IEPs increased in grade eight, averaging a difference of 45 percentage points between 2017 and 2021.

Exhibit 20. Percent of Students Who Met/Exceeded Grade Level Reading for Grade 8, 2017 to 2021

	2016-17	2017-18	2018-19	2021-22
State Proficient - All Students	38.9%	41.3%	45.1%	42.7%
State Proficient - SwD	4.6%	4.8%	6.9%	7.8%
FCPS Proficient - All Students	49.0%	51.5%	60.7%	49.1%
FCPS Proficient - SwD	5.5%	5.0%	10.2%	8.5%
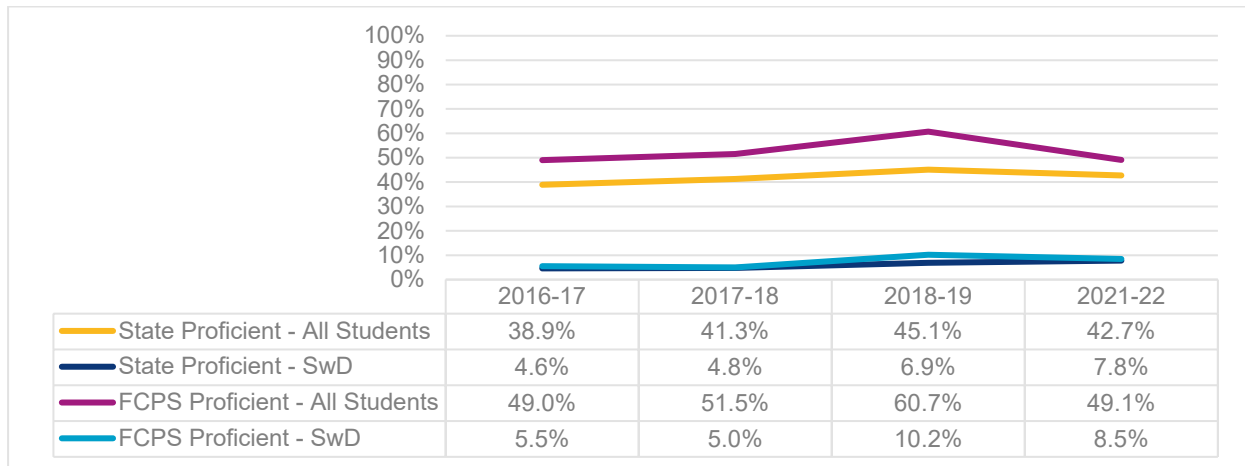
Grade 10. Similar to student performance in grade three and eight, between 2017 and 2021 the percentage of all FCPS students who met or exceeded grade level reading for grade ten exceeded the state target. Between 2017 and 2021, the percentage of students with IEPs who met or exceeded the state target was higher than the state rate for students with IEPs. Between 2017 and 2021, the achievement gap between all FCPS students and students was IEPs was 47 percentage points.

Exhibit 21. Percent of Students Who Met/Exceeded Grade Level Reading for Grade 10, 2017 to 2021

	2016-17	2017-18	2018-19	2021-22
State Proficient - All Students	49.3%	42.4%	42.6%	53.4%
State Proficient - SwD	9.7%	7.2%	7.8%	13.4%
FCPS Proficient - All Students	64.1%	61.6%	63.2%	68.8%
FCPS Proficient - SwD	15.8%	15.1%	14.4%	23.3%
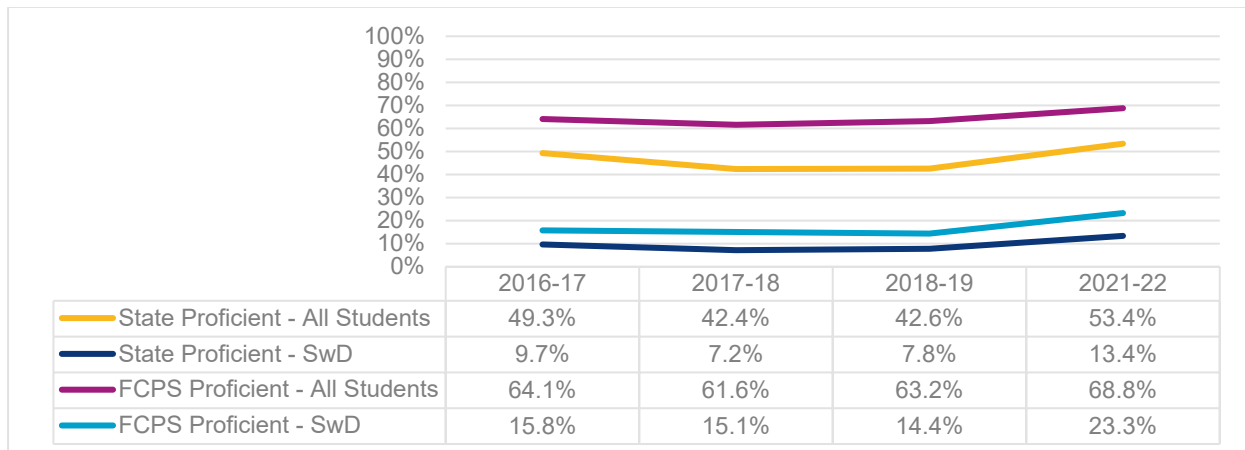
Mathematics

The percentage of students who met or exceeded mathematics standards for 2020-21 decreased dramatically from previous years in grades eight and ten, despite FCPS still exceeding the state average across all years examined. The decline in percentage for grade eight mathematics from 2018-19 to 2020-21 was 22 percentage points and 23 for grade 10 for those same years.

Grade 3. Similar to reading, the percentage of all FCPS students between 2017 and 2021 who met or exceeded grade level expectations for mathematics was above the state average. The percentage of FCPS students with IEPs who met or exceeded grade level expectations was also higher than the state during this same time period. The achievement gap between all FCPS students and students with IEPs between 2017 and 2021 averaged 32 percentage points.

Exhibit 22. Percentage of Students Who Met/Exceeded Grade Level Mathematics for Grade 3, 2017 to 2021

	2016-17	2017-18	2018-19	2021-22
State Proficient - All Students	43.0%	42.3%	42.5%	36.7%
State Proficient - SwD	14.5%	14.0%	14.6%	14.1%
FCPS Proficient - All Students	55.4%	52.8%	51.1%	49.5%
FCPS Proficient - SwD	22.6%	22.6%	17.3%	17.3%
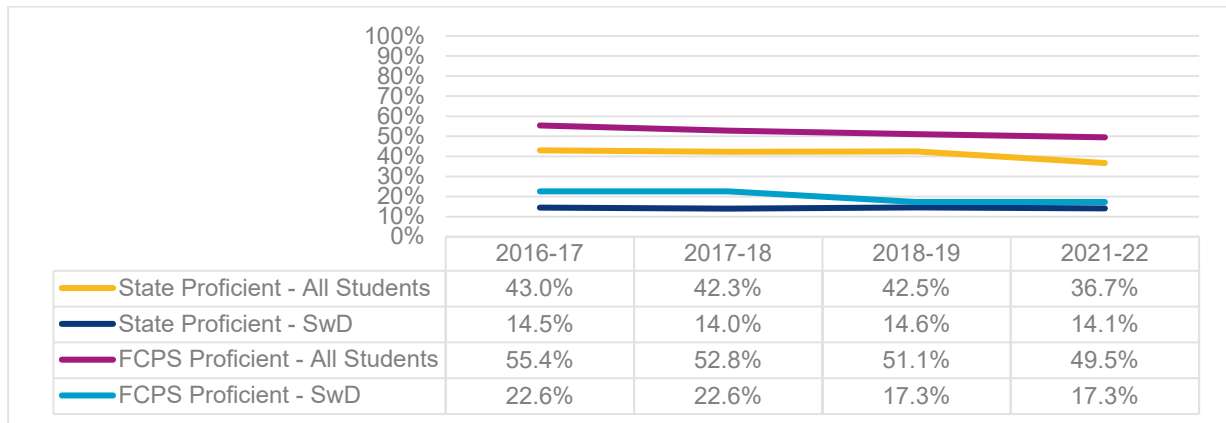
Grade 8. Similar to grade three, the percentage of all FCPS students between 2017 to 2021 who met or exceeded grade level expectations for mathematics was higher than the state rate. While there was a significant drop in mathematics for all FCPS students in 2021, following COVID-19, the percentage of all FCPS students who met or exceeded grade level for mathematics was still higher than the state average. Additionally, FCPS students with IEPs did not see that same drop and continued to average the same as previous years. The percentage of FCPS students with IEPs who met or exceeded grade level in mathematics was also higher than the state average between those years. The achievement gap between all FCPS students and students with IEPs between 2017 and 2021 averaged 26 percentage points.

Exhibit 23. Percent of Students Who Met/Exceeded Grade Level Mathematics for Grade 8, 2017 to 2021

	2016-17	2017-18	2018-19	2021-22
State Proficient - All Students	16.8%	15.9%	12.5%	6.9%
State Proficient - SwD	2.6%	2.3%	2.2%	1.7%
FCPS Proficient - All Students	37.2%	36.7%	36.9%	14.5%
FCPS Proficient - SwD	6.3%	5.1%	5.3%	5.0%
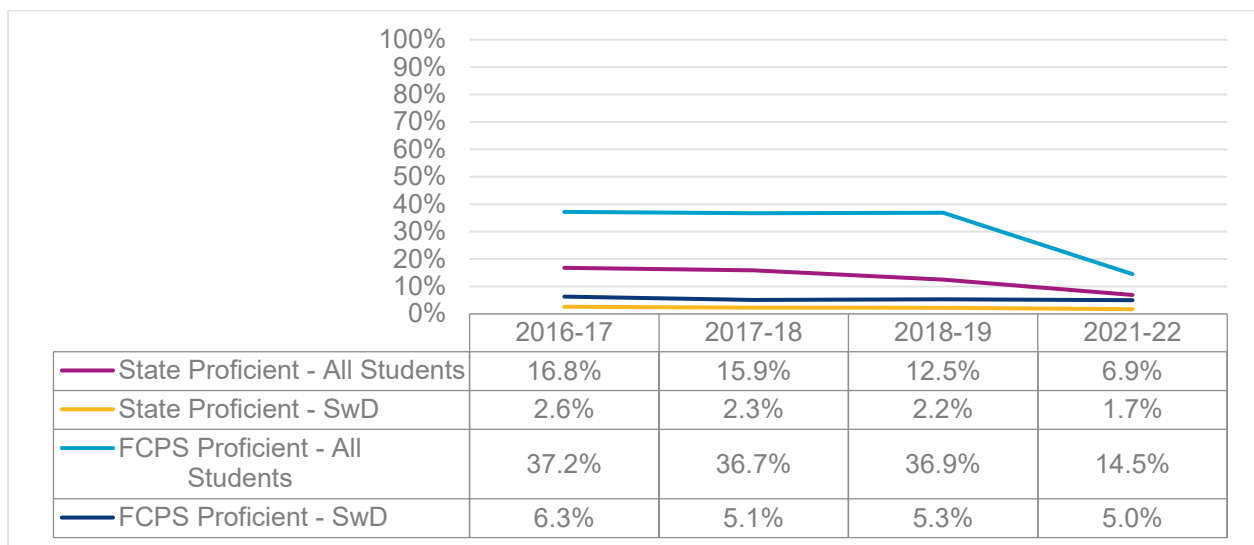
Algebra I. Between 2017 and 2021, the percentage of FCPS students who met or exceeded expectations on the Algebra I assessment was higher than the state average for all students and students with disabilities in FCPS. Like grade eight, there was a significant drop in all FCPS students who met or exceeded grade level for Algebra I, and a slight drop for students with IEPs who met or exceeded grade level for Algebra I post-COVID. The achievement gap between all students and students with IEPs between 2017 to 2021 was 37 percentage points.

Exhibit 24. Percent of Students Who Met/Exceeded Algebra I, 2017 to 2021

	2016-17	2017-18	2018-19	2021-22
State Proficient - All Students	36.5%	31.2%	27.2%	14.4%
State Proficient - SwD	8.2%	5.5%	4.4%	2.5%
FCPS Proficient - All Students	59.6%	54.4%	48.5%	25.4%
FCPS Proficient - SwD	15.2%	12.8%	8.6%	5.0%
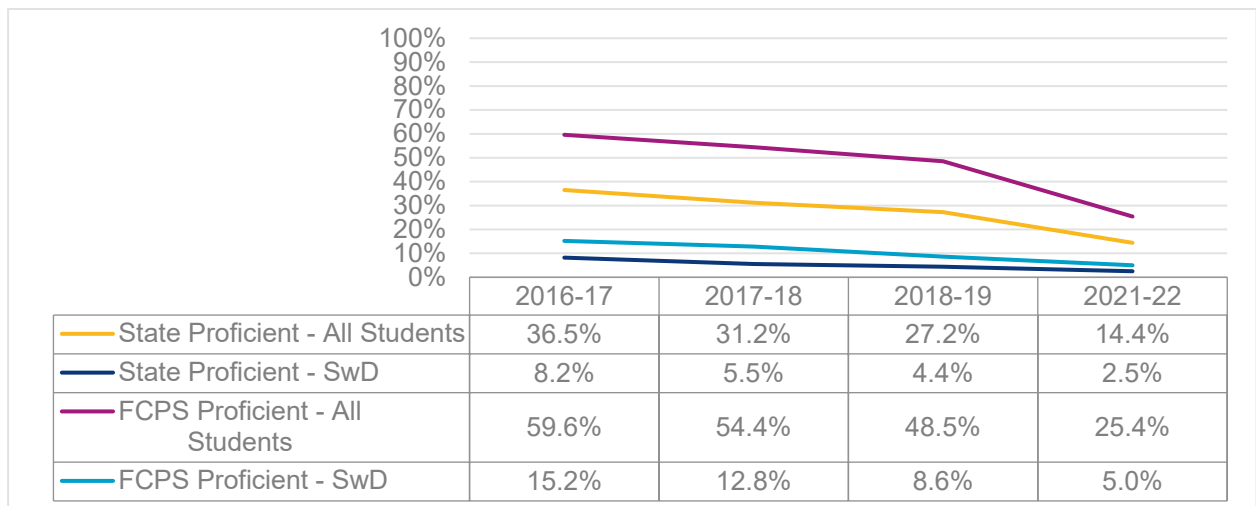
Graduation Rates

Between 2019 and 2022, a higher percentage of students with IEPs in FCPS graduated from high school compared to the state average for students with IEPs. Additionally, the all-student graduation rate for FCPS during the same period was also higher than the state average. The graduation rate for students with IEPs in FCPS between 2019 and 2022 was an average of 17 percentage points below the graduation rate for all students in the district.

Exhibit 25. Percent of All FCPS Students and Students with IEPs Graduating from High School in 4 Years Compared with State Averages, 2019 to 2022

	2019	2020	2021	2022
State Graduation Rate - Non Disabled	86.9%	86.8%	87.2%	86.3%
State Graduation Rate - SWD	65.8%	68.5%	68.1%	69.3%
FCPS Graduation Rate - Non Disabled	92.0%	92.4%	93.3%	93.1%
FCPS Graduation Rate - SWD	76.3%	73.5%	73.4%	77.7%
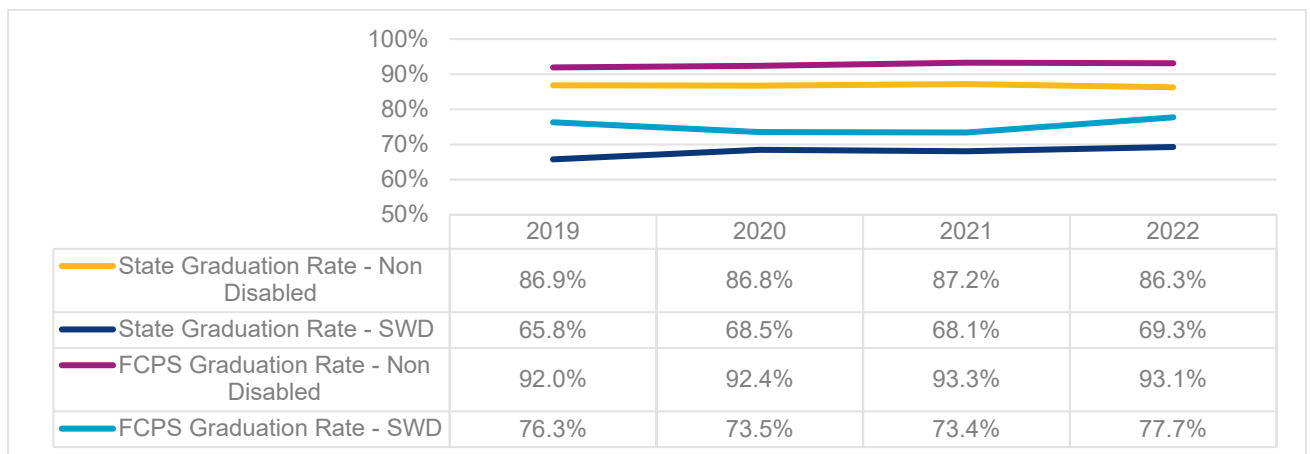
Compared to other Maryland districts and the state, FCPS had the highest graduation rate (77.7 percent). Harford County had the lowest graduation rate (62.2 percent) and was the only comparable district who had a graduation rate lower than the state average (69.3 percent).

Exhibit 26. Graduation Rate of Students with IEPs Compared to Other Maryland Districts and State, 2022
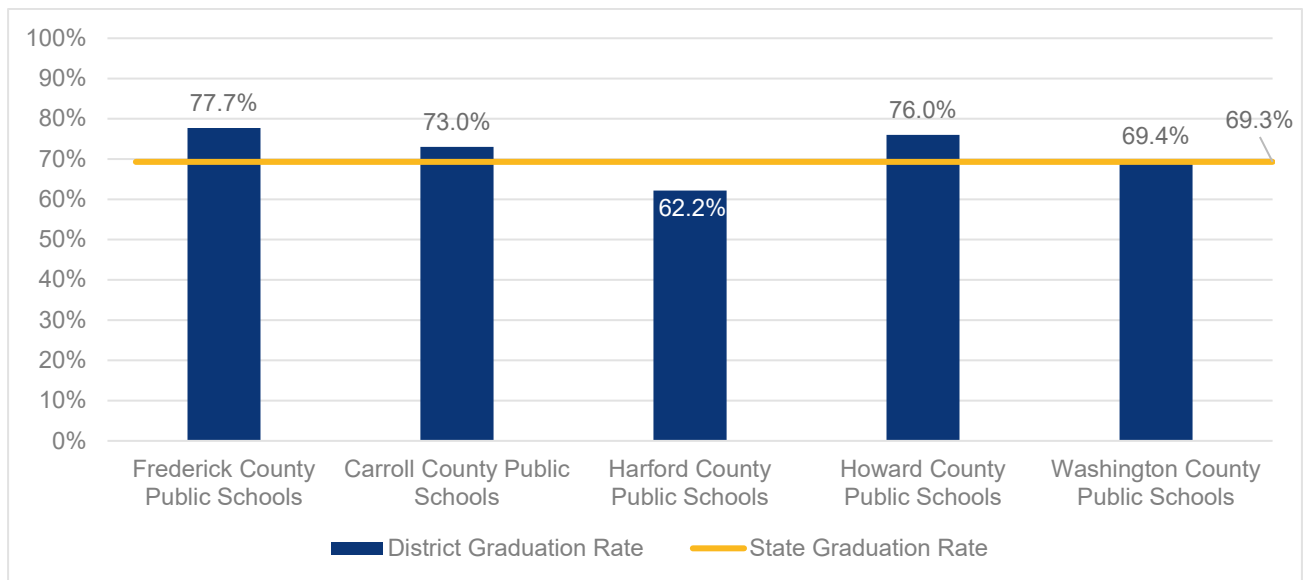
Dropout Rates

Between 2019 and 2022, FCPS students with IEPs had a dropout rate of less than 3 percent.[14] This was lower than the statewide dropout rate for students with IEPs. However, the dropout rate for students with IEPs in FCPS has increased over the last two years, with 2022 increasing significantly in the percentage of students with IEPs who drop out by 2.4 percentage points from 2021. This has caused the dropout rate for FCPS students with IEPs to exceed the dropout rate for all FCPS students.

Exhibit 27. Percent of All FCPS Students and Students with IEPs Who Dropped Out Compared with State Averages, 2019 to 2022

	2019	2020	2021	2022
Statewide Dropout Rate - SwoD	8.4%	8.3%	7.4%	8.5%
Statewide Dropout Rate - SwD	12.7%	10.3%	10.2%	11.5%
FCPS Dropout Rate - Non Disabled	4.4%	4.0%	0.0%	3.7%
FCPS Dropout Rate - SWD	0.0%	0.0%	3.7%	6.1%
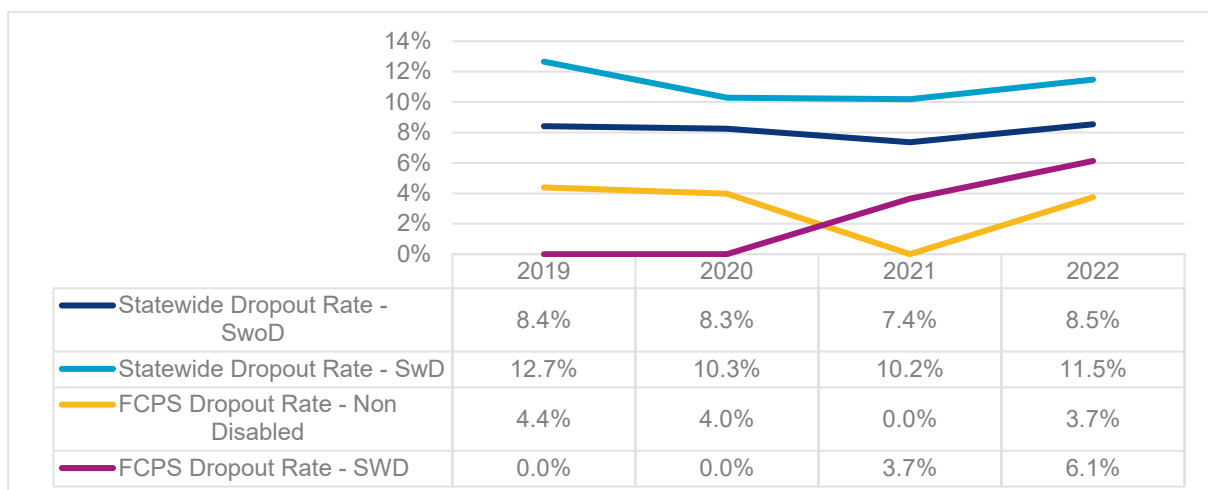
When compared to other Maryland districts, Howard County had the lowest dropout out rate for students with IEPs (3.2 percent). All comparable districts, with the exception of Harford County, had a lower dropout rate compared to the state (11.5 percent).

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[14] Due to MSDE data suppression practices, rates of below 3 percent are reported as <3%. The data depicted in the graph is reported as 0% due to the lack of a specific percentage.

Exhibit 28. Dropout Rate of Students with IEPs Compared to Other Maryland Districts and State, 2022
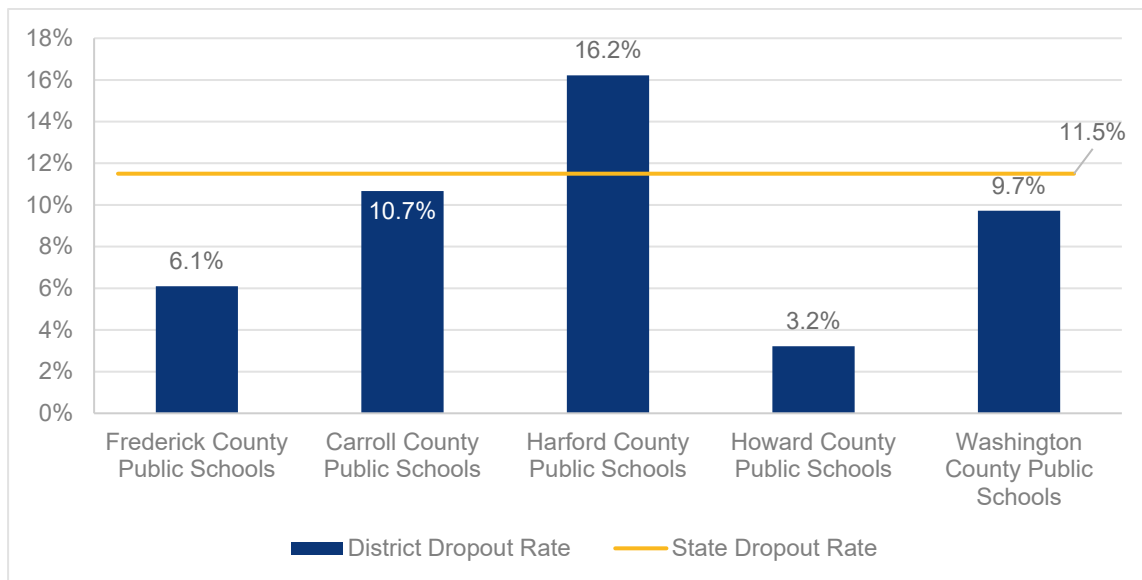
Educational Environment for Learning: School-Aged Students

The data in this section reflect educational setting rates of all FCPS school-aged students identified for special education. Exhibits are also shown by disability areas and by race/ethnicity. In addition, FCPS data are compared to state and national data, and State Performance Plan (SPP) targets for the three educational setting categories monitored by the federal Department of Education's Office of Special Education Programs (OSEP) and MSDE for students aged 6-21. OSEP requires each state to monitor and set targets in their SPP for educational settings in which identified students are educated.

Educational Settings for FCPS, Maryland, and SPP Targets

Longitudinal data from 2018-19 to 2020-21 indicate FCPS students with disabilities were more frequently in an inclusive general education setting than the target rates set forth by MSDE. Between 2018-19 and 2020-21, FCPS met the state targets for all educational settings including 80 percent or more in general education, less than 40 percent of their day in general education, and separate settings.

- **General Education Setting more than 80 percent of the time.** Since 2018-19, FCPS has exceeded the state target (70.7%) for students served in this setting (82.2%).
- **General Education Setting less than 40 percent of the time.** Since 2018-19, FCPS has been below the state target (12%) for students served in this setting (7.1%).
- **Separate Setting.** Since 2018-19, FCPS has been below the state target (6.4%) for students served in this setting (4.8%).

Exhibit 29. Percentage of Students (ages 6-21) by Educational Setting for FCPS & State SPP Targets, 2018-19 to 2020-21

	FCPS	State Target	FCPS	State Target	FCPS	State Target
	2018-19		2019-20		2020-21	
■ Separate Settings	4.6%	5.4%	4.4%	5.4%	4.8%	6.4%
■ less than 40%	7.3%	10.8%	6.8%	10.8%	7.1%	12.0%
■ 80% or more	82.2%	70.9%	82.9%	70.9%	82.2%	70.7%

■ 80% or more   ■ less than 40%   ■ Separate Settings
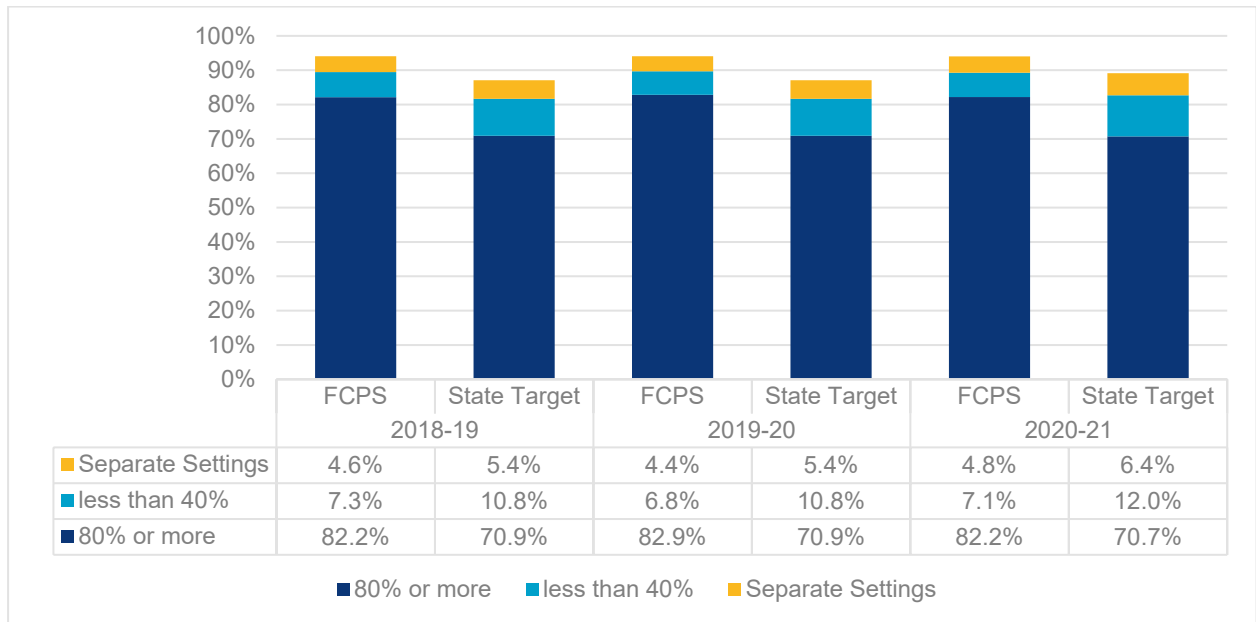
Educational Setting by Primary Disability Area

The chart below provides data on FCPS students by primary disability area and education setting. In 2022-23, 84 percent of students with IEPs spent 80 percent or more of their day in the general education setting, 4.4 percent of students spent between 40-79 percent of their day in general education, 7.7 percent spent less than 40 percent of their school day in general education, and 3.9 percent were educated in separate settings.

General Education Setting 80 percent or more of the time. Students identified in the following disability categories were included in the general education setting at a higher rate than the district average of 84 percent: speech/language impairment (98.7%), specific learning disability (98%), and other health impairment (92.1%).

General Education Setting between 40-79 percent of the time. Students identified in the following disability categories were in this setting at higher rates than the district average of 4.4 percent: intellectual disability (26.4%), multiple disabilities (7.8%), emotional disability (5.1%), and autism (6.4%).

General Education Setting less than 40% of the time. Overall, 7.7 percent of students with an IEP in FCPS were educated in the general education setting less than 40 percent of the time. Students with intellectual disabilities (51.6%), multiple disabilities (10.3%), emotional disabilities (14.9%), and autism (19.9%) had the highest percentages of students in this setting.

Separate settings. Overall, 3.9 percent of students with an IEP were educated in a separate setting. Students with multiple disabilities (9.1%), intellectual disabilities (6.9%), emotional disabilities (7.0%), and autism (6.7%) were educated in separate settings.

Exhibit 30. Educational Setting by Primary Disability

	Autism	Emotional Disability	Intellectual Disability	Multiple Disabilities	Other	Other Health Impairment	Specific Learning Disability	Speech/ Language Impairment	District Overall
■ Separate	6.7%	7.0%	6.9%	9.1%	2.2%	1.6%	0.4%	0.9%	3.9%
■ <40%	19.9%	14.9%	51.6%	10.3%	6.0%	2.8%	0.2%	0.0%	7.7%
■ 40-79%	6.4%	5.1%	26.4%	7.8%	0.5%	3.4%	1.3%	0.4%	4.4%
■ ≥80%	66.9%	73.0%	15.1%	72.7%	91.3%	92.1%	98.0%	98.7%	84.0%
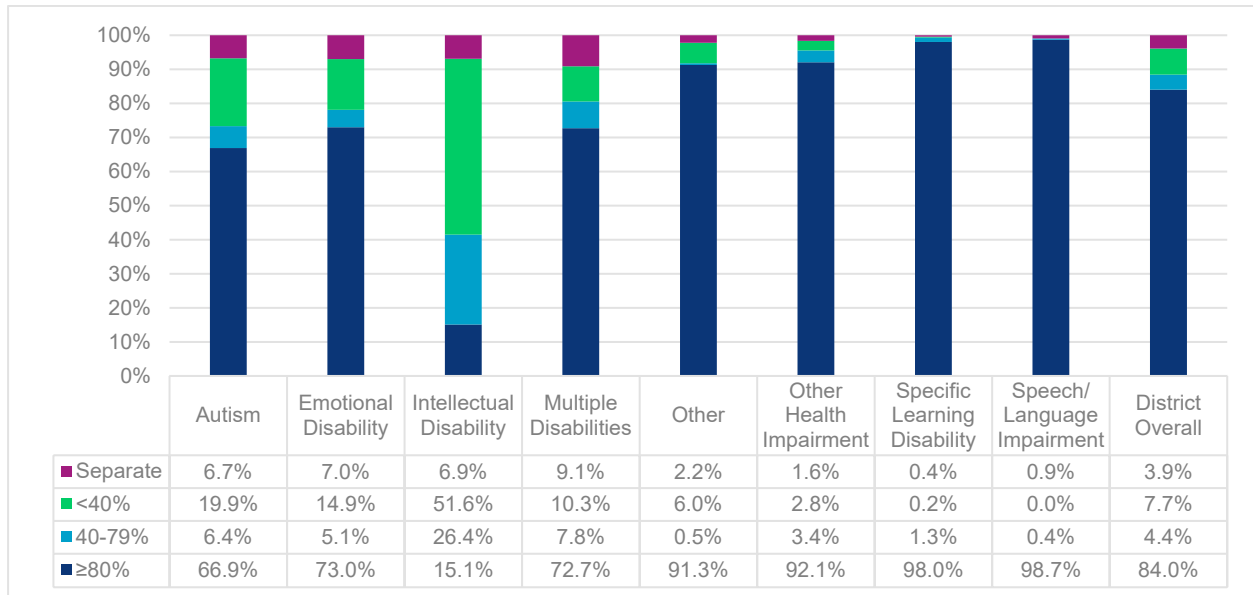
Percentage of Students by Disability Category: District, State, and Nation Comparisons in Inclusive Settings

The following comparative analysis was completed on the two most inclusive educational settings: 80 percent or more and 40-79 percent by disability category for FCPS, the state, and nation.

Emotional Disability. Compared to the state and national rates, FCPS educated a higher percentage of students with emotional disabilites in the general education setting for more than 80 percent of the time. Of the students identified with emotional disabiliies, 73 percent spent 80 percent or more of their school day in general education, compared to 53.5 percent and 55.1 percent of students with emotional disabilities in the state and nation, respectively.

Other Health Impairments. FCPS students with other health impairments were educated at a higher rate in general education for more than 80 percent of the time (92.1%), compared to the state and nation, 14.2 percent and 70 percent, respectively.

Specific Learning Disability. Of students with specific learning disabilities, 98 percent spent 80 percent or more of their day in the general education setting compared to 63.9 percent and 75.1 percent of students in the state and nation, respectively.

Exhibit 31. Percentage of FCPS Students (ages 6-21) with Emotional Disability, Other Health Impairment, and Specific Learning Disability by Educational Setting Compared to the State and Nation

	FCPS	State	Nation	FCPS	State	Nation	FCPS	State	Nation
	Emotional Disability			Other Health Impairment			Specific Learning Disability		
■ <40%	14.9%	21.1%	14.4%	2.8%	28.5%	7.7%	0.2%	10.0%	3.8%
■ 40-79%	5.1%	14.0%	17.0%	3.4%	24.7%	18.4%	1.3%	19.7%	19.2%
■ ≥80%	73.0%	53.5%	55.1%	92.1%	14.2%	70.0%	98.0%	63.9%	75.1%
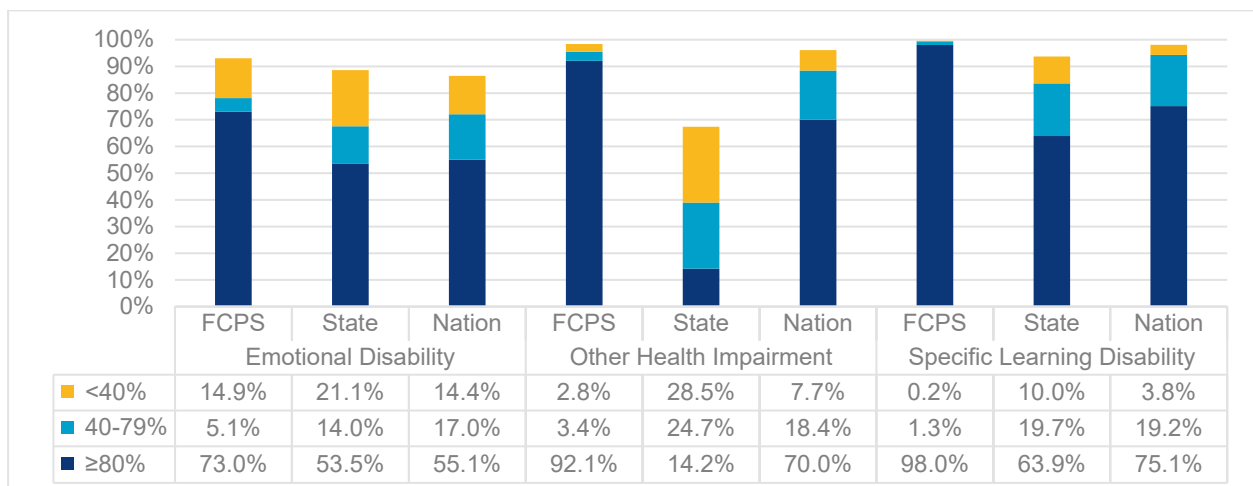
Autism. FCPS students with autism were educated at a higher rate in general education for 80 percent or more of the time (66.9%), compared to the state (21.7%), and nation (40.8%).

Intellectual Disability. Of students with an intellectual disability, 15.1 percent spent 80 percent or more of their day in the general education setting, which was lower than both the state (35.6%) and nation (20.1%). The majority of students in FCPS with intellectual disabilities spent less than 40 percent of the day in general education (51.6%), compared to the state (15.6%), and nation (46.1%).

Exhibit 32. Percentage of FCPS Students (ages 6-21) with Autism and Intellectual Disabilities by Educational Setting Compared to the State and Nation

	FCPS	State	Nation	FCPS	State	Nation
		Autism			Intellectual Disability	
■ <40%	19.9%	38.0%	34.1%	51.6%	15.6%	46.1%
■ 40-79%	6.4%	21.9%	17.2%	26.4%	24.7%	27.6%
■ ≥80%	66.9%	21.7%	40.8%	15.1%	35.6%	20.1%
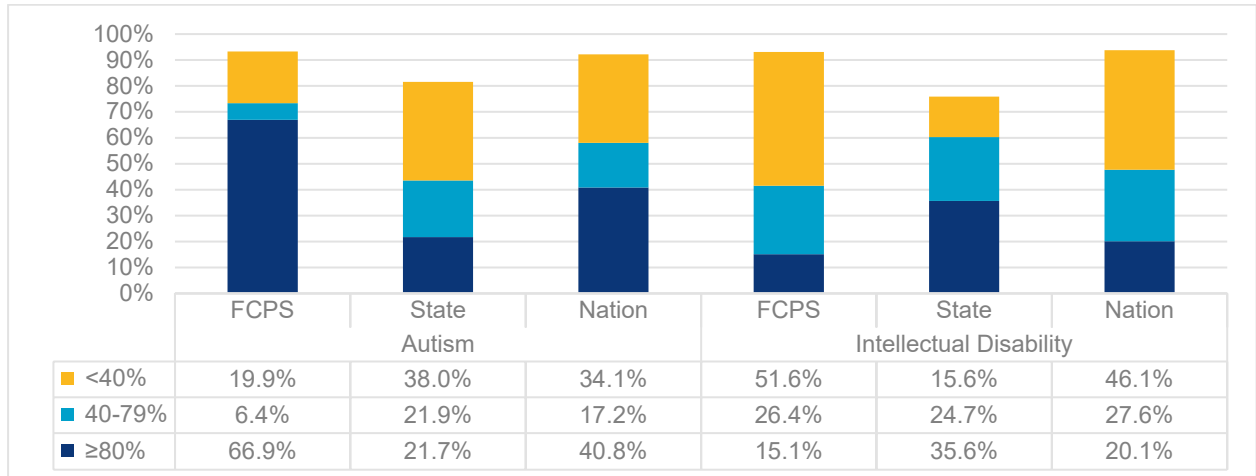
Educational Setting by Race/Ethnicity

The exhibit below provides data on FCPS students by race/ethnicity and education setting.

The following race/ethnicities were included in the general education setting 80 percent or more of the school day at a higher rate than all students with IEPs average (84.1%): White (85.3%), Hispanic (84.4%), and American Indian or Alaskan Native (85.7%). A larger percentage of Asian, Black or African American, Hispanic, and Native Hawaiian or Pacific Islander spent less than 40 percent of their school day in the general education setting than all students with IEPs (7.7%), and American Indian or Alaskan Native and Black or African American students were educated in separate settings at a higher rate than all students with IEPs (3.9%).

Exhibit 33. Percentage of FCPS Students with Disabilities (ages 6-21) by Race/Ethnicity and Educational Setting, 2023

	American Indian or Alaskan Native	Asian	Black or African American	Hispanic	Native Hawaiian or Pacific Islander	White	Overall
■ Separate	8.2%	3.3%	4.5%	3.0%	0.0%	3.9%	3.9%
■ <40%	0.0%	11.9%	10.0%	8.2%	27.3%	6.3%	7.7%
■ 40-79%	6.1%	6.2%	3.9%	4.4%	0.0%	4.5%	4.4%
■ ≥80%	85.7%	78.6%	81.7%	84.4%	72.7%	85.3%	84.1%
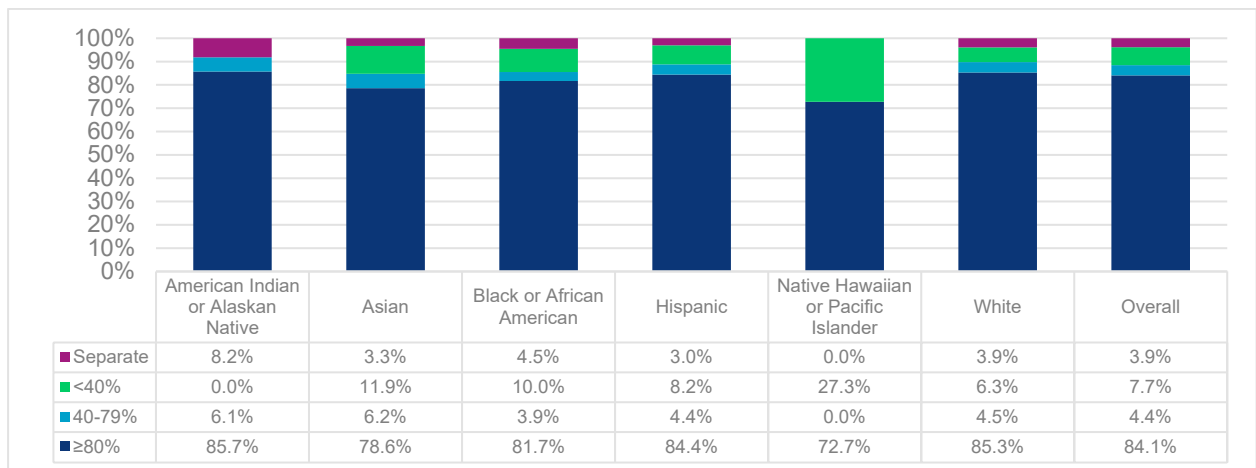
District Comparisons

Compared to other Maryland districts, Harford County had a higher percentage of students spending more than 80 percent of their school day in the general education setting (84.0 percent) while Howard County had the lowest (74.7 percent). All comparable school districts had larger percentages of students spending 80 percent of more of their school day in the general education setting compared to the state (70.7 percent). Howard County had the lowest percentage of students who spent less than 40 percent of their school day in the general education setting (2.7 percent).

Exhibit 34. Percent of Students by Education Setting for Comparable Districts

	Frederick County Public Schools	Carroll County Public Schools	Harford County Public Schools	Howard County Public Schools	Washington County Public Schools	State
■ Separate	4.8%	3.5%	7.0%	6.9%	4.4%	6.4%
■ <40%	7.1%	10.3%	3.8%	2.7%	9.8%	12.0%
■ 40-79%	5.9%	10.9%	5.2%	15.8%	5.3%	10.9%
■ ≥80%	82.2%	75.3%	84.0%	74.7%	80.5%	70.7%
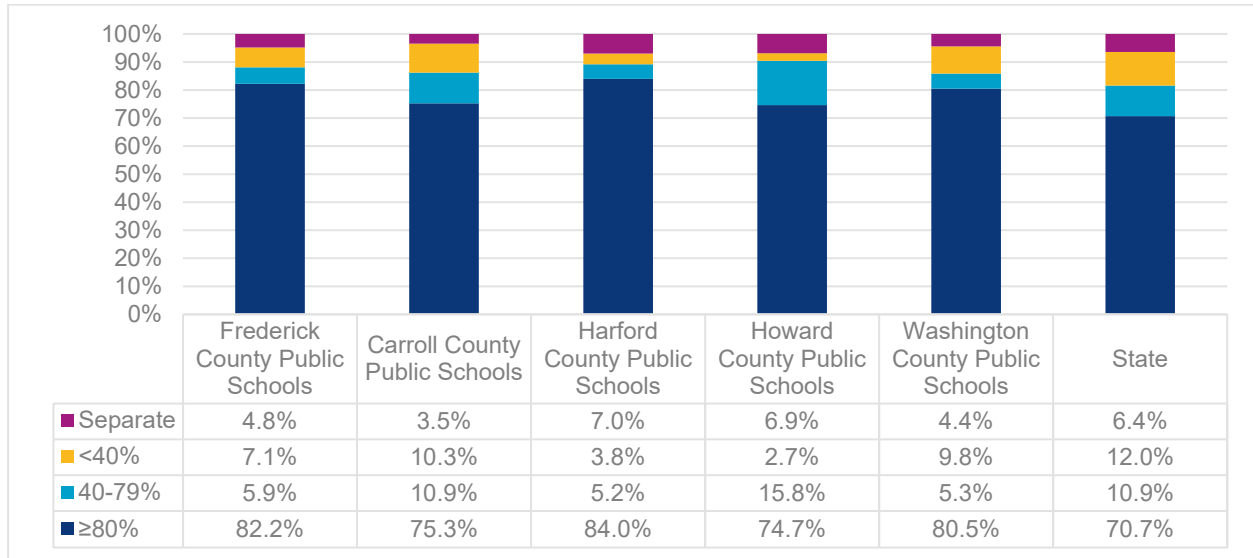
Summary and Implications

The data in this chapter showcase both positive trends in FCPS as well as areas that require further analysis. FCPS has met state targets per the SPP and has demonstrated achievement higher than the state average for reading and mathematics for both students with and without disabilities. These indicate FCPS is on its way to developing strong systems that support student achievement. It is notable FCPS has a higher four-year graduation rate for students with and without disabilities than the state average. There are some concerning trends, however, related to the achievement gap in reading and math for students with IEPs and increasing dropout rates for students with IEPs over the last two years. This is an area FCPS should further investigate to determine why students with IEPs are dropping out at much higher rates than previous years.

In looking at disability classification, FCPS identifies students under the disability classification of multiple disabilities at much higher rates than the state and nation. This indicates that FCPS could be using the definition of multiple disabilities incorrectly in making these determinations. Further analysis and understanding of the criteria used for making this determination would be warranted. FCPS also exceeds the 2.0 risk ratio threshold for the identification of Asian students under the disability classification of autism. This indicates Asian students are more than twice as likely to be found eligible for special education under the classification of autism. Additionally, Hispanic students are 1.5 times more likely to be identified as having an intellectual disability, and while this does not exceed the 2.0 threshold for significant disproportionality, it does indicate there should be further analysis to ensure both Asian and Hispanic students are not being disproportionately identified under these disability categories.

School-age students with disabilities were educated at a higher rate in an inclusive general education setting than the state target. FCPS has a high number of students with intellectual disabilities not included in the general education settings: this rate is significantly higher rate than both the state and nation. FCPS should conduct further analysis into why students with intellectual disabilities are not afforded more inclusive opportunities throughout their school day.

Lastly, data show that FCPS fell shy of consistently meeting the state target for preschool outcomes. This will be another area for FCPS to further analyze to determine if there are opportunities at the preschool level to increase readiness of students as they enter the K-12 setting.

IV. LEARNING ENVIRONMENT AND SPECIALIZED SERVICES

Strengths
• **Multi-Tiered System of Supports (MTSS).** Well-established MTSS framework with expectations and guidance. • **Least Restrictive Environment (LRE)**. Prioritization of educating students with disabilities in the least restrictive environment. • **Central Office Commitment.** Department of Special Education (DSE) has displayed an ongoing effort to support schools and staff across initiatives. • **Procedures and Guidance**. Support documents and guidance are available to school-based teams to assist with consistency and expectations.

Opportunities for Improvement
• **Multi-Tiered System of Supports.** Refinement of implementation of MTSS framework at the school level with unified expectations, progress monitoring, and consistency of coordination with academic and behavioral expectations. • **Specialized Programming.** Restructure specialized programs to ensure students are placed in the appropriate program to address their instructional needs and that programs are designed with continuity across grades and levels. • **Inclusive Practices.** District level vision, expectations and professional learning fostering inclusive practices and co-teaching must be established from district administration. • **Behavior Supports.** School staff are struggling to support students with challenging behaviors and are requesting strategies to handle behavioral crises. • **IEP Development.** Student file reviews revealed inconsistencies in the quality and organization of IEPs developed across all documented areas.

Creating an environment in which every student, including those with and without disabilities, can learn and succeed individually, and the way in which a school community supports all students, is at the core of inclusion.[15] Research has consistently shown a positive relationship between effective and inclusive 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 into the community. The 10-year National Longitudinal Transition Study-2 (NLTS-2) described the characteristics, experiences, and outcomes of a nationally representative sample of more than 11,000 youth ages 13 through 16 who were receiving special education services in grade seven or above when the study began in 2001. The study found that while more time spent in general education classrooms was associated with lower grades for students with disabilities compared to their nondisabled peers, students who spent more time in general education settings were closer to grade level on standardized math and language tests than were students with disabilities who spent more time in separate settings.[16]

Additional studies have confirmed this finding, in that students with disabilities who are in general education classrooms more than 80 percent of the school day and have increased exposure to high-quality core instruction have improved academically on state mandated tests.[17] Research also shows

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[15] http://inclusiveschools.org/together-we-learn-better-inclusive-schools-benefit-all-children/
[16] https://ies.ed.gov/ncser/projects/nlts2/
[17] Roden, L., Borgemenke, A, & Holt, W. (2013). Improving the Academic Achievement of Students with Disabilities. National Forum of Special Education Journal, Vol. 24, No. 1.

that including students with a range of disabilities in general education classes does not affect the achievement of their nondisabled peers.[18]

Effective core instruction provided in the general education setting is instrumental when closing the achievement gaps that exist between students with disabilities and their non-disabled peers. NAEP data gathered in 2019 reported that 90 percent of students with disabilities perform below the proficient level for 4th grade reading compared to 62 percent of students without disabilities.[19] [20] It is common practice to supplant core instruction for students with disabilities with specially designed instruction or intervention supports delivered by special educators or paraprofessionals during core instructional time with the intent of closing a skills gap. However, the inherent nature of this approach shifts the expectation away from general educators being responsible for the academic growth of all students in their respective classes.[21] Districts should prioritize ensuring students with disabilities receive supplemental intervention support and/or specially designed instruction while remaining a part of rigorous core instruction, when appropriate, with both delivered by highly qualified staff.[22]

Students with disabilities in inclusive environments also gain additional benefits that extend beyond academics. They develop friendships with nondisabled peers, learning appropriate behaviors and communication skills from them and understanding how to navigate social situations.[23] And when in classes with nondisabled students, those with disabilities benefit from the enriched educational experience and are often held to higher academic expectations both from their peers and their teachers. Inclusive schools with school-wide behavioral supports help to establish high expectations throughout the community. This consistency and structure are critical for students with disabilities but is also important for all students.

Despite the clear benefits of inclusion, implementation in districts across the country, and in FCPS schools, varies. The following section describes supports for students with disabilities in the general education classroom and the current state of inclusive practices. This section also includes an analysis of specialized programs and IEP files.

Access to the General Education Curriculum

The following section of this report outlines supports and services available within FCPS for students with disabilities to access the general education curriculum.

Multi-Tiered Systems of Support (MTSS)

Multi-Tiered System of Supports (MTSS) is an intervention and instructional framework that creates the necessary systems to ensure all students have access to a high-quality educational experience. This section reviews FCPS's progress towards implementing an MTSS framework across schools. While intervention supports are offered as a core component of the general education curriculum, successful implementation of MTSS will reduce unnecessary referrals to special education.

MTSS Framework

The provision of instruction, interventions, and support to students within a framework of Multi-Tiered System of Supports (MTSS) improves educational outcomes for all students, including those with Section 504 Plans and IEPs, and others who are Emergent Bilingual and/or gifted/talented.[24] The

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[18] id.

[19] U.S. Department of Education, "Reading, Grade 4, Disability status of student, excluding those with 504 plan – Average scale scores," National Center for Education Statistics (NCES)

[20] id.

[21] Wiernusz , M., & Cleveland, C. (2020). Blurring the Divide: Improving Special Education by Strengthening Core Instruction. *District Management Journal*, *27*.

[22] id.

[23] id.

[24] 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.

framework focuses on prevention and the early identification of students who may benefit from instructional and behavioral interventions, as well as acceleration, that remove barriers to learning.[25] When implemented as intended, MTSS leads to increased academic achievement by supporting rigorous core instruction, strategic/targeted interventions, and improved student behavior. Furthermore, the framework has been successfully used to support a reduction in disproportionate special education referrals of students based on race, gender, socioeconomic or Emergent Bilingual subgroups. Reflecting on the growing recognition of MTSS as a system-wide framework for supporting student achievement and positive behavior, the Every Student Succeeds Act (ESSA) includes MTSS as a permissible usage of Title I funds. The Act defines MTSS as "a comprehensive continuum of evidence-based, systemic practices to support a rapid response to students' needs, with regular observation to facilitate data-based instructional decision-making."[26] MTSS provides an overall framework for structuring and coordinating the provision of core instruction along with additional behavioral support, such as behavior modifications or mental health supports, some students require so that all are successful. MTSS is centered on a tiered system of support, where every student receives high-quality core instruction, known as Tier 1. Some students need supplemental instruction, which is referred to as Tier 2, and a small cohort of students receive the most intensive intervention and supports, known as Tier 3. Movement among these tiers should be fluid. A student with acute needs does not need to progress through the tiers to get individualized support, and a student who needs extra support should not miss core instruction that is provided in Tier 1.

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

Maryland Guidance

In Maryland, there are multiple guidance documents published by the Maryland State Department of Education (MSDE). MTSS is mentioned frequently, but there is no one document that articulates the vision of MTSS for Local Education Agencies (LEAs) in Maryland. There is no mention of MTSS in the Strategic Plan for the Division of Early Intervention and Special Education Services, v.2 2016, updated June 2021.[27] The MSDE School Discipline Basics guidance document refers briefly to MTSS as being a culmination of Positive Behavior Intervention Supports (PBIS), Response to Intervention (RTI), and Social-Emotional Learning (SEL). The most comprehensive guidance is included in the Maryland Key to Comprehensive Literacy Guidance Document, v.1 2017, updated 2020.
There are five keys cited in the strategic plan. Key 5 focuses on the adoption of Universal Design for Learning (UDL) in all classrooms. As stated, this approach allows choice and individualization for students which, in turn, allows teachers to provide tiered instruction. The objectives for Key 5 are outlined below and most frequently mention MTSS.

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[25] MTSS reflects the merger of response to instruction/intervention (RTI2), which typically focuses on academic achievement, and a system used to focus on improving positive behavior support.
[26] Elementary and Secondary Education Act, as reauthorized in 2015.
[27] Maryland State Department of Education, Strategic Plan: https://marylandpublicschools.org/programs/Documents/Special-Ed/DSEEIS%20Strategic%20Plan%20[June2021Update]_MSDE_Document.pdf

Exhibit 35. Maryland Department of Education, Strategic Plan for the Division of Early Intervention and Special Education.

Objective	Description	Timeline	Responsible Party
Objective 1	Provide professional learning for LEA staff on MTSS to meet the needs of all students including SWD.	2018-2020	Special Education and Content Staff
Objective 2	Provide resources for implementing MTSS • Revise & transform Maryland's RTI framework to MTSS framework.	2018-2019	Special Education and Content Staff
Objective 3	Provide Technical Support • Provide training and monitoring and reporting required by the Specialized Intervention Act of 2017. • Provide training and resources on progress monitoring for MTSS instruction.	2018-2020	Special Education and Content Staff

At this time, based on research of the MSDE, there appears to be no evidence the State has implemented MTSS throughout the state and has determined MTSS implementation will be up to the LEAs to integrate into their instructional frameworks.

District Practices

FCPS embarked on building capacity of schools on the MTSS framework in the 2017-18 school year. At this time, the MTSS academic tiered approach was phased in with an emphasis on Tier 2 and 3 interventions. During the 2018-19 school year, a work group was established with the Department of Student Services and the Department of Special Education to develop and phase in the behavioral side of the MTSS tiered framework. As FCPS continued their work with developing the framework in 2020-21, an additional workgroup was established to phase in and further enhance the MTSS behavioral tiered approach. Development, training, and implementation of MTSS occurred from 2021-2023. During this time school leaders and their teams refined their School Improvement Plans (SIP) to include a goal addressing MTSS for academic and behavioral improvement for students requiring additional intervention.

Currently several offices contribute to the oversight and direction of MTSS in the District. For example, the Department of Assessment and Intervention plays a key role and leads the county-wide process that provides prevention, early intervention services, and appropriate instructional programming to ensure academic progress and success for all students. The process includes continuous and varied assessments of student performance that lead to data-based decision making and the use of multi-tiered, research-based intervention. Department Goals include to 1) build assessment literacy; 2) make decisions based on the use of student data; 3) support professional learning through resources and training; 4) provide early interventions to struggling students; 5) improve communication among stakeholders Pre-K to 12; 6) reinforce the use of technology for assessment administration and data-collection; and 7) encourage feedback and goal-setting to increase student achievement. The Office of Special Education and Student Services (OSE&SS), inclusive of the DSE, also has a significant role in MTSS specific to behavioral interventions and Tier 3 supports.

District level administration acknowledges FCPS engages in MTSS; however, there is a lack of clarity on when, what it all means, and what office is responsible for which components of it. Overall, the MTSS process needs to be strengthened by adopting consistent practices at the school level. Other staff surveyed remarked that MTSS works well in their school, there are opportunities for training, and students have access to interventions when necessary.

FCPS staff were surveyed to determine their perspectives on the components of MTSS. School administrators, general educators, and special educators consistently had varying results across the board for all questions related to specific interventions. Based upon survey results, 92 percent of school building administrators agreed their school provides sufficient Tier 1 general education reading interventions, whereas 82 percent of general educators and 70 percent of special educators agreed with this statement. School building administrators also rate both Tier 1 general education math and behavior intervention supports at 76 percent, respectively, at a higher rate than their general and special educators.

The following percentage of educators agree their schools provide sufficient general education interventions in reading, math, or behavior.			
	Reading Interventions	Math Interventions	Behavior Interventions
Special Education Teachers	70%	64%	52%
General Education Teachers	82%	71%	65%
Related Service Personnel	70%	68%	57%
Student Support Personnel	83%	76%	67%
School Administrators	92%	76%	76%
			Staff Survey

The FCPS Behavioral and Academic Multi-Tiered System of Support (MTSS) framework, developed in 2022, is a comprehensive manual guiding school teams in the individual processes of fidelity and effectiveness when implementing the many facets of MTSS. The manual addresses Universal Screening through all tiers of Math and Reading intervention at all levels. It also includes specific guidance on the flow from one decision to the next within specific grade levels and content areas and is a comprehensive, detailed resource for school staff. According to the FCPS website, a variety of evidence-based interventions for Reading and Math are available.

They include the following:

- Elementary Reading: Orton Gillingham Plus, Language Foundations, and Sounds and Syllables.
- Elementary Math: Connecting Math Concepts, SRA Number Worlds, Math Navigator, and Do the Math.
- Secondary Math: Math Workshop and Individualized Intervention Plan (IIP) at the middle schools and Algebra Acquisition and Individualized Intervention Plan (IIP) at the high schools.

This chart provides a summary of intervention descriptions and intensity levels by tier.

Exhibit 36. Academic Interventions by Tier
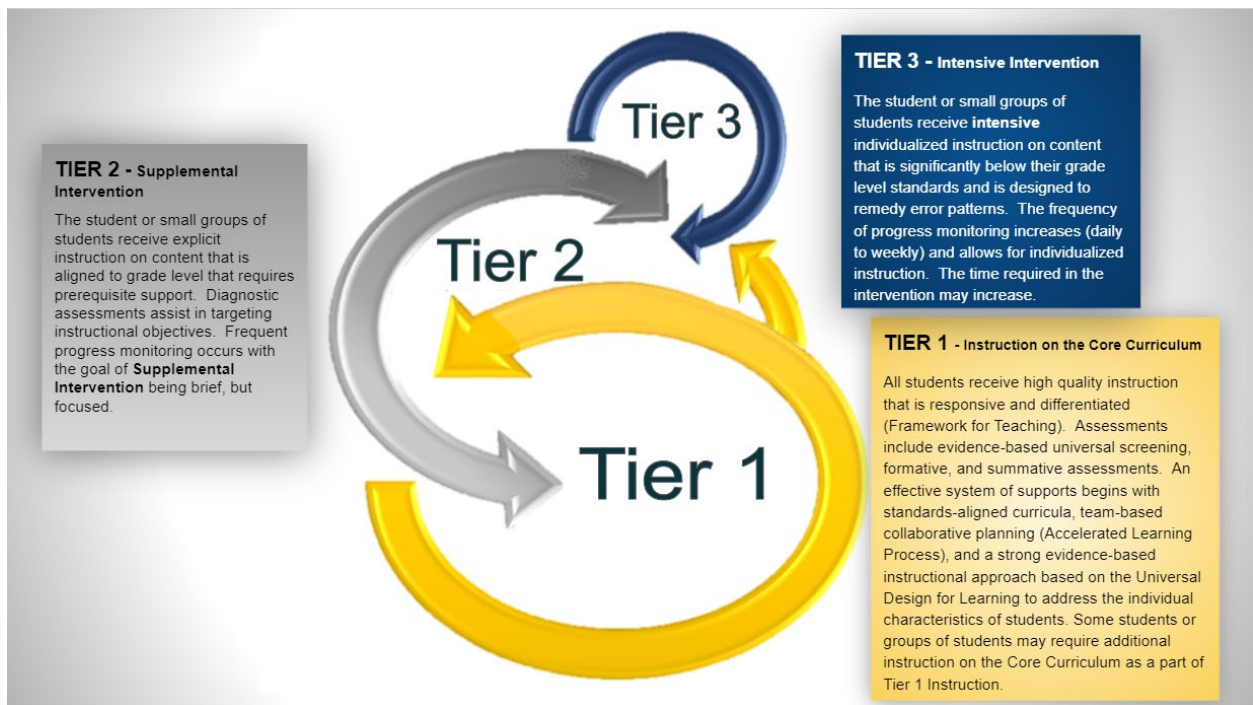
The discrepancy in agreement ratings across focus group participants ranged notably, particularly across the members of the team who are responsible for the implementation of MTSS procedures. This discrepancy could be attributed to inconsistencies among schools and uncertainty among school staff about how this framework applies to their daily work. School-based teaching staff shared the following specific feedback:

- Consistency across the county for MTSS is needed.
- The continuity of services and training of general education teachers is lacking.
- Students may not receiving any interventions, behavior support plans, etc. because schools are not certain how to use the MTSS guidance in their buildings.

This feedback indicates FCPS would benefit from reflecting on the current training and implementation of MTSS and consider offering differentiated training opportunities for schools that may need more intensive guidance and those who may be ready for the next level of support to fine-tune their practices.

Additional information about behavior interventions is included later in this section.

Intervention Data Collection and Progress Monitoring

FCPS has adopted Power School Unified Classroom™ Performance Matters progress monitoring tool to support school-based staff in documenting and monitoring MTSS. CORE Teams at each school are intended to monitor MTSS implementation and review progress monitoring data.

FCPS staff were surveyed to ascertain their perspectives on whether every attempt is made to meet student's needs through general education. Responses indicate a discrepancy between school building administrators and teaching staff. Individuals responsible for the provision and documentation of MTSS services, which included teaching or student support services staff, showed agreement between 57 and 88 percent as compared to 96 percent of school building administrators.

A common theme resonating with study participants is that individual schools are removing special educators from the classroom to provide reading interventions through MTSS. This practice causes one to take a pause, most remarkably students with disabilities are reportedly not receiving their required services according to the IEP. Staff survey participants voiced concerns about staffing for interventions and access to interventions:

- *We need more intervention teachers, so students do not end up in special education.*
- *Given the tiered approach, there are not enough staff to provide interventions with fidelity. Teachers are often pulled to cover a classroom or perform other duties.*
- *Special education staff should not be teaching OG+ and other reading interventions unless we are sufficiently staffed to meet the needs of all special education services.*
- *There is a lack of intervention options. Most times students are just supposed to fit into the current intervention options. There is not an answer as to what interventions are available.*

Additionally, there is confusion among some teachers as to why reading specialists are not being assigned reading intervention groups, why general education teachers are not involved in the discussion of the student and only fill out paperwork, and a feeling the MTSS process is long and arduous.

FCPS has engaged in a multi-year journey of implementing MTSS. The process is intensive and requires a concentrated effort from all parties to ensure fidelity. There is a demonstrated need for clarity in the function and process of MTSS in FCPS. According to FCPS guidance, MTSS serves as the structure to ensure students are adequately supported in reading, math, and behavioral interventions through the process of progress monitoring prior to initiating a special education referral. Establishing consistency across schools for the implementation of MTSS will allow for a more rigorous structure of referring students who are not making progress within the tiered system of supports.

Referral and Eligibility Determination Process

The Code of Maryland Regulations (COMAR) is the governing body of work for regulating all matters related to the state of Maryland, including the special instructional programs provision of a Free and Appropriate Public Education (FAPE) to implement Part B of the Individuals with Disabilities Education Act (IDEA). According to FCPS guidance, prior to an evaluation, FCPS "shall ensure appropriate interventions for the student through all available resources within a general education setting. The evaluation data on the student's response to interventions (RTI) at the different tiered levels will be reviewed…The Student Services Team (SST) and Multi-Tiered System of

> ➢ 75% of Pre-K parents
> ➢ 78% of elementary school parents
> ➢ 71% of middle school parents
> ➢ 66% of high school parents
>
> Agree that FCPS staff clearly explained why their child needed special education services.
>
> *Parent Survey*

Supports (MTSS) guidance shall be implemented prior to a student being referred to the IEP team for initial evaluation." After a well-documented approach to implementing research-based interventions and supports a student who has not responded to interventions and who may need special education will be referred, in writing, to the IEP Team, or through a parent letter. All schools are expected to implement the "pre-referral" process and document the results prior to referring a student to the IEP Team. Per COMAR, the IEP team shall complete an initial evaluation for a student within a) 60 days from parental consent or b) 90-days of the public agency receiving a written referral. The parents must provide written consent before assessing a student. It is important to note a student is not required to pass through the SST process or all levels of MTSS prior to submitting a referral for initial evaluation.

When initiating a referral for special education it is imperative the school team have a detailed discussion with the parent to ensure understanding of the referral process. Parent survey responses to one specific question inquired as to whether parents received clarification of why their child needed special education services. The survey results were overwhelmingly positive; however, it is clear the higher the level of schooling (i.e., high school versus Pre-K) the less parents felt they were given a clear explanation of why their child needed services.

Open-ended survey responses, related to the referral process specifically shared by parents reflect on the timeliness of the referral and evaluation process at their specific schools. Parents shared:

- *We have not been meeting deadlines since my child started at X school and I am told that there are longer than usual wait times for meetings with appropriate staff and evaluations. There seem to be no consequences at the district level for not meeting mandated deadlines.*
- *The school was slow to get back to us when we requested an evaluation for an IEP/504.*
- *My child's elementary teacher saw signs of Dyslexia/Dysgraphia in the first grade. Unfortunately, they attributed it to him not trying hard enough. He did not start receiving services until third grade which was during COVID.*

MTSS is a framework that identifies research-based interventions and the effect of implementation when a student is struggling academically and/or behaviorally. The levels of MTSS are strategically implemented and may take time to gather data to realize their effectiveness. FCPS must engage in transparent communication with parents, as equal team members regarding the purpose of MTSS and how it is not meant to delay the referral/evaluation process, but rather is a system of strategies that, over time, offer each student who may need extra assistance the time and place to progress.

The following is the FCPS Eligibility Flowchart, which shows the steps that the District takes to ensure timely completion of an evaluation.

FCPS Eligibility Flowchart

Exhibit 37. FCPS Eligibility Flowchart

Schedule Eligibility Meeting to fall within the 90-day timeline or the 60-day timeline, whichever end date comes **first.** NOTE: The timeline relates to a 365-day calendar, not a school year/business day calendar. Weekends and school closure dates **are included** in the timelines.

⬇

Conduct an IEP Team Eligibility meeting within the required time frame. Provide the Parental Safeguards booklet to parent/guardian. If the parent/guardian requests to delay the IEP team meeting, complete the SE:36.

⬇ ⬇ ⬇

The student is not eligible for special education because no disabling condition was identified. Prior Written Notice is required using the IEP Team Meeting Report (SE:7) and must be provided to parents within 5 business days.	The student has an education disability, however, is not eligible for special education services because specially designed instruction is not needed. Prior Written Notice is required using the IEP Team Meeting Report (SE:7) and must be	The student is eligible for special education services. Prior Written Notice is required, using the IEP Team Meeting Report and must be provided to parents within 5 business days of the meeting.

⬇

	provided to parents within 5 business days.	
		Develop and approve an IEP within 30 days of initial eligibility. **The IEP cannot be implemented without written parent approval.**

Survey participants to a great extent parents expressed concern about the referral/evaluation process and the District's response:

- *FCPS does not believe parents and waits too long to test them as a result.*
- *I felt dismissed by the school staff and had to seek outside providers for help.*
- *My child had an evaluation by the school district, and they did not find him eligible. I have spent over 50K on outside services.*
- *Being behind/understaffed causes many families to pay themselves for outside evals that may not even be accepted.*
- *We need to be heard when we request testing.*

> ➢ 80% of special education teachers
> ➢ 51% of general education teachers
> ➢ 77% of related service providers
> ➢ 65% of student support personnel
> ➢ 92% of school administrators
>
> Agree that there is a no delay in the process when a student is referred for special education services.
>
> *Staff Survey*

On the staff survey, FCPS staff were asked if there is no delay in the process when a student is referred for special education services. Ninety-two percent of school administrators agree with this statement. This evidence points to an opportunity for FCPS to further inform and train these professional groups in the importance of their role in the referral and evaluation process and the timelines associated with them. Additionally, it is an area in which FCPS could further investigate why there is a large discrepancy between various personnel groups in terms of their response.

Focus group members, mainly FCPS staff members expressed concern related to timeliness of the referral process, including:

- Child Find has a reported 6-month backlog because there are many parent requests. Progress is beginning to occur in this area.

- Child Find has been delayed in responding to requests which have potentially prevented some three-year-olds from opportunities.
- Students who need behavioral support often end up on the special education referral "track" within 6 months so conversations about supporting that student and coordinating services should happen more efficiently and earlier on.

➢ 94% of special education teachers
➢ 70% of general education teachers
➢ 85% of related service providers
➢ 71% of student support personnel
➢ 92% of school administrators

Agree that the results of special education evaluations are shared in ways that provide meaningful insights into students' educational needs.

Staff Survey

These findings are supported by survey results. FCPS staff were asked whether staff in their school understand the steps and timeline associated with the referral process. Special educators (41%), related service providers (44%), and student services personnel (44%) overwhelmingly disagreed with this statement followed by general educators and school administrators.

Staff survey respondents responded favorably when asked if the results of the special education evaluations are shared in ways that provide meaningful insights into students' education needs. The survey results also indicated that 94 percent of special educators and 92 percent of school administrators agreed that evaluations are sufficiently comprehensive to identify students' specific strengths and needs. While the referral and evaluation processes are perceived to be flawed in meeting timelines, FCPS staff believe the evaluations are meaningful for educational planning purposes.

On a related note, PCG recognizes FCPS has made progress with State Performance Plan (SPP) Indicator 11. This indicator measures the percentage of students with written parental consent to evaluate who were evaluated within 60 calendar days. Data over the course of a three-year period demonstrates improvement.

Exhibit 38. SPP Indicator 11 Three-Year Data

Federal Fiscal Year (FFY)	State Target	FCPS Results
2020	100%	100%
2019	100%	99.86%
2018	100%	99.71%

During the evaluation process communication with families either during the MTSS process or when a referral is made for an initial evaluation is essential to the success of supporting all students. Meaningfully involving families in all aspects of their child's education is at the core of ensuring success for all students. Each family's unique circumstances require an individualized approach to understanding families of children with disabilities. Most importantly families of children with disabilities engage in different ways than others. Educators must be willing to value the many ways they choose to be involved.[28]

➢ 41% of special education teachers
➢ 58% of general education teachers
➢ 44% of related service providers
➢ 44% of student support personnel
➢ 67% of school administrators

Agree that staff in their school understand the steps and timelines associated with the referral process.

Staff Survey

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[28] https://iris.peabody.vanderbilt.edu/module/fam/cresource/q2/p06/#content

Special Education Continuum of Services

IDEA is explicit in the regulatory directive to LEAs that each school district must ensure students with disabilities are educated in the Least Restrictive Environment (LRE). Specifically stated are two important requirements:

1. Students with an IEP should be educated with children without disabilities to the "maximum extent that is appropriate" with children who are nondisabled.
2. Removal from the general education classroom should only occur when, "due to the nature of the child's disability, education in a general education classroom with supplementary aids and services cannot be achieved satisfactorily."[29]

While school districts must provide a continuum of special education services and placements available, IDEA regulations presume the general education classroom will be the placement for every child with a disability, unless education in that setting cannot be satisfactorily achieved even with supplementary aids and services.

The FCPS Special Education Handbook issued/revised in 2022-23 ensures all students have available to them a Free and Appropriate Public Education (FAPE) in the LRE designed to meet their needs to make progress toward achieving the goals and objectives in their IEPs.

Goals specifically related to the continuum of services include:

1. Ensuring all students with disabilities have available to them a FAPE, which includes special education and related services to meet their unique needs.
2. Provide a full range of educational opportunities that are offered in the least restrictive environment (LRE) for each student.
3. Assess and ensure the effectiveness of efforts to provide an appropriate educational program for all students with disabilities.

The OSS has established a process to guide school staff when considering a change in placement focusing on the individualized needs of the students and what supports may be necessary. This process applies to specialized programs (e.g., Expressions, L4L, Pyramid, Rock Creek School, and Success) within FCPS and requires the supervisor/coordinator who supports these programs to conduct a file review, an observation of the student, consultation with the case manager and instructional fidelity checks. In addition, FCPS has established detailed criteria for each program to guide school-based teams in the decision-making process to a more restrictive setting. Based on the results of the implementation and review of tiered supports and progress data a change in the LRE is discussed with the school-based team.

The special education continuum of services and support offered in FCPS focuses on a range of programming opportunities from the least to most restrictive setting to meet the diverse needs of students with disabilities. Related services and supports unique to each student are available for them to benefit from their IEP. Decisions regarding where a student will access their FAPE are based upon the IEP team's decision. Below is a brief explanation of the continuum of services and support currently available in FCPS.

Special Education Services in General Education Setting

The following are descriptions of special education services provided to students with IEPs in the general education setting.

Consultation: No direct services are provided to students with disabilities who are learning alongside their non-disabled peers with the implementation of their IEP. There is a range of special education services in the general education setting offered at each school to meet students' individual needs.

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[29] https://sites.ed.gov/idea/statute-chapter-33/subchapter-ii/1412/a/5

Co-Taught: Co-Teaching is a partnership or collaboration between two or more instructors. Frequently, this partnership consists of one general educator and one special educator, but it can be any pairing of instructional staff including but not limited to the general educator, special educator, intervention teacher, school-based specialist or related service provider. It involves the distribution of responsibility for planning instruction and evaluation for a classroom of students.

Push-In: Special educators schedule services on a flexible basis. Schedules are coordinated with the general educator based on student needs in inclusive classrooms where student(s) with disabilities are accessing the general education curriculum. The push-in model is not a traditional "co-teaching" model. The special educator may provide services in multiple classrooms within the same instructional period. In the push-in model, the special educator's role can include but is not limited to modifying curricular resources, planning with the content teacher(s), and leading differentiated groups, as well as planning and implementing re-teaching or modified versions of any learning episodes.

Open Resource: An open resource room is available to students with an IEP at any point during their instructional day for access to accommodations, supplementary aids and services, test preparation or completion, completing assignments, guided practice with emerging skills, and/or re-teaching. Students should not access the resource room during direct instruction of their content area classes. The resource room is open throughout the day and is monitored by a trained staff member (special educator, SEIA, general educator, etc.).

Pull-Out Resource: Students are scheduled to meet with a provider to support IEP implementation, including accommodations, supplemental aids, goals/objectives instruction, pre-teaching, or re-teaching. The student's service hours on his or her IEP reflect how often and how long a student is "pulled" for the resource service. Best practice suggests that students are pulled during non-academic times or non-direct instruction. This location can be in a special educators' classroom or in any specified room in the school.

Specialized Programs

The following are descriptions of special education services provided to students with IEPs in specialized programs.

Special Education Pre-Kindergarten: FCPS offers a half-day educational program at selected sites for children ages 3-5 who require support through an inclusive special education pre-K classroom. Inclusive pre-K classes educate all students using academic standards while implementing IEPs for eligible children who have been identified with a disability. Participation in this program provides opportunities for all students to strengthen their social and academic skills through an inclusive preschool setting.

Expressions: Expressions provides integrated and enhanced special education support for students with functional communication needs. Students are provided with a variety of communication methods, as they develop verbal speech and/or functional communication in a small, structured classroom with opportunities for inclusion also provided. The program uses a variety of instructional strategies and evidence-based practices, including principles aligned with Applied Behavioral Analysis. Programs are staffed with a high adult-to-student ratio. Students work on the Essential Elements of the Maryland College & Career Readiness Standards, adaptive, self-advocacy, life, and functional communication skills. Students pursue a High School Certificate of Completion and graduation status is reviewed annually beginning in third grade.

Learning for Life: L4L provides integrated support to students with a variety of developmental and cognitive disabilities in a small, structured classroom with opportunities for inclusion with non-disabled peers, as appropriate. Students learn functional academic and life skills and receive instruction in modified Common Core Standards. After third grade, students pursue a High School Certificate of Completion. Graduation status is reviewed annually.

Pyramid Program: Pyramid provides integrated support to students with significant social and emotional needs. Intensive special education and therapeutic services are provided in a small,

structured setting within a general education school. Students have opportunities for inclusion in general education classes with non-disabled peers, as appropriate, and are pursuing a high school diploma.

SUCCESS: SUCCESS is a transition–education program for students ages 18-21 who have an IEP and are pursuing a Maryland High School Certificate of Completion. Students considered for the program have completed at least 4 years in a comprehensive high school, have had work experience, and exhibit potential for competitive employment. The program focuses on developing skills for independent living and functional academics and offers students a range of employment opportunities.

Rock Creek School: RCS is a special education public separate day school that serves diverse functional academic, medical, and behavioral needs, as appropriate, for students ages 3-21 who have significant cognitive disabilities and are working on a Maryland High School Certificate of Completion. While there is an emphasis on functional academics, instruction is also based on the Maryland College and Career Ready Standards. Communication, decision-making, interpersonal, career/vocational, recreational/leisure, and community-based skills, as well as other IEP needs, are addressed, as appropriate. Related services may include adapted art, music, and physical education, assistive technology, occupational and physical therapy, and hearing, vision, and speech and language services.

RISE (Responsive Interventions for Student Excellence): The RISE program is in Hillcrest Elementary in FCPS under the authority of Sheppard Pratt Health System, Inc., a Type II school program developed to assist students with autism spectrum disorders, emotional disabilities, or other appropriate disabilities transition to a less restrictive setting. The school serves students in grades 1-5 that are expected to earn a high school diploma. The program has a capacity of ten students and is a collaborative effort between Sheppard Pratt Health System (SPHS) and the Frederick County Public Schools (FCPS). The FCPS curriculum (Maryland College and Career Ready Standards) is used as the basis for instruction.[30]

> ➢ 48% of special education teachers
> ➢ 72% of general education teachers
> ➢ 53% of related service providers
> ➢ 47% of student support personnel
> ➢ 58% of school administrators
>
> Agree that FCPS offers a continuum of services to meet the needs of all students with IEPs.
>
> *Staff Survey*

FCPS has a broad range of services for students with disabilities. Feedback from a variety of participants, however, indicated there are certain groups of students who may need specific programming to meet an unmet need. Specifically, respondents shared students with high-functioning autism need specialized programming to meet their social-emotional and academic needs. One participant stated that their school needs more programming for this student population.

Less than half of special educators (48%) and student support personnel (47%) surveyed agreed that FCPS offers a continuum of services to meet the needs of all students with IEPs, while just over half of related service providers (53%) and school administrators (58%) agreed. A greater percentage of general educators (72%) agreed.

Focus group participants shared the following perceptions about the continuum:

The continuum of services has not grown to meet the unique student need.

- Our system is lacking in the continuum of services for students: "*we are 'robbing Peter to pay Paul' in terms of overburdening resources*."
- Services should be provided for students who can access the general education curriculum but cannot do it in a general education setting.
- There are gaps in the continuum for students who are potentially high achieving but do not have a lot of language/social skills.

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[30] Service Delivery and Programs | Special Education (fcps.org)

- The current continuum does not serve students on the autism spectrum – they are being placed in a program for students with behaviors that are not always appropriate. There must be a better continuum of services.
- There needs to be more programs and more sites overall.

One participant sums it up by sharing: "*My hope would be to have a true continuum of services that keeps students in their home feeder patterns and prioritizes inclusion with typical peers as appropriate.*"

When asked if students with IEPs are receiving instruction and services in general education classes to the maximum extent possible, 78 percent of general educators surveyed agreed. One subgroup stands out with a significant difference of opinion from other subgroups, where 57 percent of Specials/Elective teachers disagreed.

Despite the number of survey participants feeling students with IEPs are receiving instruction and services in the general education setting to the maximum extent possible, staff surveyed were clear in their feedback regarding current services in FCPS and the belief they are not meeting the needs of all student groups with varying needs.

Several respondents discussed the term "in-between kids" and felt the current services did not meet their needs. Participants shared the following when discussing their concerns regarding the current services in FCPS:

- There are not enough diverse programs/LRE. It feels like there is insufficient programming to meet the needs of students "in-between", specifically students who cognitively struggle but socialize with their peers.
- There is a need for more programs - the current ones are missing a big population of students who do not fit into the current programming (Learning 4 Life, Expressions and Pyramid).

This feedback raises the question about what type of more intensive and targeted services and supports could be provided for students who do not qualify, or who would not benefit from, one of the existing specialized programs.

Inclusive Practices

Inclusion in the classroom is a term that became popular in the 1980s and was used to distinguish special education placement in the general education classroom with appropriate support. This was different from the prior concept of "mainstreaming." The practice of mainstreaming allowed for students with disabilities to be placed in general education classrooms without the support they needed to be successful. It is important to note that the term "mainstreaming" was used shortly after the special education law was first implemented (1978) and special education was viewed as the "place" where students learned. Through the reauthorizations of IDEA and as special education expertise grew, special education is no longer considered to be a place of instruction but rather a constellation of instructional modalities, including those that are specialized. The concept of inclusive instruction has grown to the idea of supporting the learning of students with IEPs along with their typical peers through Universal Design for Learning (UDL), differentiated instruction, collaborative teaching, and co-teaching.[31]

> ➢ 86% of special education teachers
> ➢ 78% of general education teachers
> ➢ 81% of related service providers
> ➢ 57% of specials/elective teachers
> ➢ 84% of school administrators
> ➢ 93% all staff
>
> Agree that FCPS students with IEPs are receiving instruction and services in the general education setting to the maximum extent possible.
>
> *Staff Survey*

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[31] Footnote: New Jersey Coalition for Inclusive Education: https://www.njcie.org/about-inclusive-ed

According to qualitative comments gathered from focus groups and interviews FCPS leadership and staff have expressed a positive outlook of embracing students with disabilities in school district activities. Overall 93 percent of staff survey participants agree their school provides an inclusive environment for students with disabilities. This is a very significant agreement rating in data collected as part of this study.

> ➢ 91% of special education teachers
> ➢ 97% of general education teachers
> ➢ 93% of related service providers
> ➢ 86% of student support services
> ➢ 96% of school administrators
>
> FCPS staff agree that my school(s) provides an inclusive environment for students with disabilities.
>
> *Staff Survey*

Focus group and interview comments from staff surveyed also appear to embrace inclusivity. There is a common understanding that students with disabilities are to be included in all activities supported by FCPS. During the school day students in specialized programs are to participate in the general education curriculum as much as possible. Focus group and interview participants shared how students with disabilities are included on their campuses. Specifically, they noted FCPS's commitment to giving students with disabilities access to their peers and letting them participate in as many activities as possible (field trips, recess, adaptive physical education/specials, etc.). They were also proud of supporting a strong culture of inclusion and how they make it work at every opportunity. One example of such inclusion was observed by PCG in high school Unified Physical Education classes.

Collaborative Teaching

Collaboration amongst professionals is multi-dimensional. It requires a deep commitment on the part of all professionals with a common belief that the efforts of two are exponentially greater than those carried out in isolation. However, a commitment to collaboration is not sufficient. It must be accompanied: by a) strong communication (both verbal and non-verbal) between professionals, b) the ability to connect in a shared problem-solving interaction, and c) the commitment to carry out, with fidelity, co-teaching where a general educator and a special educator collaborate in the general education classroom to simultaneously deliver grade-level curriculum to meet the specialized needs of students with disabilities.

Effective collaborators use respectful and effective communication skills to promote positive relationships and build trust among professionals and families. Effective collaborators are aware of and continue to hone their collaboration and communication (verbal and non-verbal) skills when interacting with others. They also encourage others to share their knowledge and perspectives. Often during the collaborative teaching process, there are interpersonal challenges or differences of opinion. When teachers and other professionals are effective collaborators, they are ready to interact positively and productively with diverse individuals in the school and community.

Collaborative practices seem to be influenced by multiple factors across schools, teachers, and teacher training as well as across different school cultures. These factors may include master scheduling, teachers' attitudes regarding collaboration, teachers understanding of the co-teaching models, and how to co-plan, co-teach, co-serve, and co-assess as a collaborative team. For collaborative teaching to be effective, it takes district-wide support from district and school leaders who can foster a collective commitment to the collaborative teaching overall process by dedicating their energy to the areas of professional learning, increasing team members' collaborative skills, creating schedules that support collaboration, and an ongoing effort to create model co-teachings classrooms from which the district can build upon.[32]

Within FCPS there appears to be varying perspectives on collaborative teaching. It is important to note that most staff comments refer to co-teaching and not collaborative teaching. It appears these terms may be used interchangeably. Information gathered from focus groups, interviews, open-ended survey data and classroom observations reveal a disconnect related to the priority for collaborative

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[32] Barron, T and Friend, M, 2019. Collaborating with Colleagues to increase student success.
Billingsley, B., Brownell, M.T, Lewis, T, Maheady, L., and McLeskey, J. High Leverage Practices for Inclusive Classrooms. https://highleveragepractices.org/sites/default/files/2020-10/colaborationfinal.pdf

teaching or co-teaching. These inconsistencies lead to a lack of co-teaching structures observed and are noted by survey and focus group members.

- Special education teachers are assigned to classes and are often in and out of the room during a class period or are not consistently co-teaching.
- Professional learning on co-teaching models would be beneficial, as well as an overview of expectations.
- In many cases, the classroom subject teacher and the special education teacher do not have adequate training and time to develop a collaborative teaching model.

Inclusion is a philosophy that drives resources, professional learning practices and scheduling. Co-teaching is one service delivery option supporting an inclusive mindset where two licensed teachers are co-planning, co-teaching, co-serving, and co-assessing. If these four things are not happening, then true co-teaching is not occurring.[33]

Based on the SPP Indicator 5A, 80 percent or greater of students with disabilities in FCPS are receiving their special education services in a general education classroom. Focus groups, survey comments, and classroom visits indicate though, there is little to no evidence there has been a concerted effort to develop model classrooms with ongoing professional learning for co-teaching school-based teams. Specifically, when answering the question "FCPS has established standards for delivering co-teaching/collaborative instruction," respondents agree at a low rate, with only 41 percent of special educators and 40 percent of general educators agreeing.

> - 41% of special education teachers
> - 40% of general education teachers
> - 44% of related service providers
> - 43% of student support services
> - 35% of school administrators
>
> Agree that FCPS has established standards for delivering co-teaching/collaborative instruction.
>
> *Staff Survey*

Below is a synopsis of feedback shared from focus groups, interviews, and survey comments by instructional level on the prevailing barriers to implementing co-teaching structures. In discussing co-teaching/collaborative instruction with participants across all levels there appeared to be inconsistencies regarding class sizes, scheduling, and planning time. Most notably, this impacted special educators' ability to provide more meaningful instruction in the general education classroom.

Elementary School Level

- The formula for class size varies from school to school, sometimes making it challenging to support in the general education classroom. For example, one school with two classrooms of 30 students impacts the ability to support inclusion and the ability for teachers to have adequate time with those students who need support.
- Teachers have identified many students who would benefit from inclusion opportunities, but it comes down to a staffing issue.
- There needs to be a better plan for scheduling services in the general education classroom based on student needs and staff direction for co-teaching models.

Middle School Level

- The middle school schedule is made more difficult by the number of periods students are navigating. For students who have exceptional needs or have executive functioning challenges, this is especially challenging, as they may need more support across all of their classes.
- There are challenges with the Master Schedule. For example, if schools put all students who require special education services in one of three tracts, then those students are together most of the day. This can sometimes lead to behavior issues.

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[33] Murawski, W.W. (2003). *Coteaching in the Inclusive Classroom*. Bellevue, WA: Bureau of Education & Research.

- There is built-in time for elementary teachers to co-plan for the implementation of co-teaching strategies; however, there is no time in the middle school schedule to do this.

High School Level

- There is no time for collaborative planning when teaching with multiple teachers. When collaboration occurs, it is mostly talking to people in the hallway rather than actual practicing.
- There are increasing demands for intensive interventions, and the groups are sometimes very small for these interventions. For example, some intervention groups are only one or two students. This arrangement limits the availability of special educators to support co-taught classes.
- Co-teaching is more effective when a special education teacher is there frequently and engaged in the work. Co-teachers are frequently not present as often as they should be due to competing priorities (IEP meetings, paperwork).

FCPS has admittedly not emphasized co-teaching since 2020. The professional learning training for co-teaching developed by FCPS was introduced in 2011 and, to PCG's knowledge, has not been updated. FCPS has placed the focus of professional learning on Specially Designed Instruction (SDI). The source of the content FCPS has been using is *The Division of Early Intervention and Special Education Services of the MSDE (issued November 2019): A Guide for Implementation of Specially Designed Instruction within an Integrated Tiered System of Supports*. FCPS began training on SDI in 2019 and recently conducted training in January 2023. SDI training is also conducted for new teacher induction. Despite these resources being available, there was limited evidence of SDI documented in the classroom observations conducted by PCG. The strongest evidence of SDI was observed during small group instructional sessions. The co-taught classrooms observed either did not demonstrate SDI or examples were inadequately implemented.

It is critical for FCPS leadership to prioritize developing an action plan to build model classrooms for inclusive practices to support students with disabilities receiving instruction in the general education classroom. Critical aspects of this plan should include extensive professional learning on co-teaching models, building strong co-teaching relationships, adequate staffing model to support co-teaching, and master scheduling to ensure services are delivered according to the IEP.

The academic gap between students with IEPs and their nondisabled peers is wide in FCPS, as noted earlier in this report. These data, coupled with the call for more specialized programming, suggest that staff do not feel equipped to help students of varying needs and abilities succeed in the general education classroom.

Specialized Programming

More restrictive placements for students along the LRE services and supports continuum are made by the IEP team under the procedural guidance of the FCPS *Standard Operating Procedures for Changing a Student's LRE*. Being placed in a more restrictive setting does not guarantee the student will remain in their home (neighborhood) school or consistently have access to general education peers. Specialized programs are spread throughout the county. Focus group participants and staff interviews participating in this study provided the following feedback about current specialized program concerns and their desires for additional programming:

- Expressions program is only offered at one middle school and one high school. Expressions students are mostly not in their home school.
- Combining programs in schools would allow families to stay with the same school when their student transitions to needing more support.
- There is a need to expand programs – Expressions and L4L specifically are filling up and there is a perception that there is "nowhere to put students."

The determined location of specialized programs within the county was frequently questioned by study participants throughout the data-gathering process. There were questions about the distribution of programs throughout the county and the impact of multiple specialized programs on an individual school with 15 schools out of a total of 27 being assigned more specialized programs than others.

FCPS has 70 schools in total and of that number, only 27 schools have specialized programs located in their buildings. Some schools have a significant number of specialized classrooms, most notably Governor Johnson High School has nine in total. Some FCPS staff voiced their desire to de-centralize the assignment of specialized programs to minimize transferring students so often:

- Families often feel their connections are being uprooted when they must make a move to a different school.
- There is a lack of placement options. Students are placed by location instead of by need.
- Students may be the bus for over two hours one-way in some situations because programs are spread across the county.
- Classes should be spread out across schools.

During this study, it was frequently mentioned that specialized programs need to be distributed throughout the county equitably, so families are not uprooted at each level of programming as their children age and transition to other grade levels.

The most populated specialized programs of most concern to staff and parents are shown below. The breakdown of the number of programs at each level, staffing ratios, student count, and time of service in general education.

Exhibit 39. Expressions Program - All Levels, 2022-23

School	Carroll Manor ES	Deer Crossing ES	Middletown ES	Middletown Primary	Gov. Thomas Johnson MS	Gov. Thomas Johnson HS
# of Teachers	**4**	**3**	**2**	**4**	**3**	**3**
# of SEIAs	12	9	6	9	9	9
# of Students	**31**	**25**	**14**	**21**	**15**	**21**
<40% in general education	29	21	14	21	14	19
40-79% in general education	1	2	0	0	1	1
>80% in general education	1	1	0	0	0	0
Hospital/Homebound	0	1	0	0	0	1
Average Caseload	**7.8**	**8.3**	**7.0**	**5.3**	**5.0**	**7.0**

Exhibit 40. Learning for Life Program – Elementary and Middle School, 2022-23

Schools	Glade ES	Monocacy ES	Orchard Grove ES	Twin Ridge ES	Crestwood MS	Middletown MS	Oakdale MS	Walkerville MS	West Frederick MS
# of Teachers	**1**	**1**	**1**	**1**	**2**	**1**	**1**	**1**	**1**
# of SEIAs	2	2	2	2	6	3	3	3	3
# of Students	**10**	**10**	**12**	**8**	**18**	**18**	**10**	**13**	**9**
<40% in general education	8	10	10	7	11	11	8	11	7
40-79% in general education	2	0	2	0	7	7	2	2	2
>80% in general education	0	0	0	1	0	0	0	0	0
Hospital/Homebound	0	0	0	0	0	0	0	0	0
Average Caseload	**10.0**	**10.0**	**12.0**	**8.0**	**9.0**	**18.0**	**10.0**	**13.0**	**9.0**

Exhibit 41. Learning for Life Program – High School, 2022-23

Schools	Brunswick HS	Frederick HS	Governor Thomas Johnson HS	Linganore HS	Middletown HS	Oakdale HS	Tuscarora HS	Urbana HS	Walkers-ville HS
# of Teachers	1	2	3	1	1	1	2	1	1
# of SEIAs	3	6	9	3	3	3	6	3	3
# of Students	5	27	21	14	10	7	18	14	13
<40% in general education	0	24	18	2	0	2	18	10	5
40-79% in general education	4	3	2	12	8	4	0	3	8
>80% in general education	1	0	0	0	2	1	0	1	0
Hospital/Homebound	0	0	1	0	0	0	0	0	0
Average Caseload	5.0	13.5	7.0	14.0	10.0	7.0	9.0	14.0	13.0

Exhibit 42. Pyramid Program - All Levels, 2022-23

School	Blue Heron ES	Lewiston ES	Ballenger Creek MS	New Market MS	Gov. Thomas Johnson HS	Tuscarora HS	Walkersville HS
# of Teachers	5	4	3	3	3	3	3
# of SEIAs	15	12	9	9	9	9	9
# of Students	24	17	14	21	15	28	15
<40% in general education	20	15	10	13	6	7	2
40-79% in general education	0	0	2	1	2	8	2
>80% in general education	3	2	2	7	7	13	11
Hospital/Homebound	1	0	0	0	0	0	0
Average Caseload	4.8	4.3	4.7	7.0	5.0	9.3	5.0

When asked directly, FCPS is cognizant of students being placed in specialized programs who did not exactly meet the criteria but rather placed in a program based on space. Unlike the Learning for Life programming, which is spread throughout 18 schools in the county, the Expressions and Pyramid programs are limited to six and seven schools for each program respectively, placing a greater burden on students having to move schools more frequently. Taking a closer look, especially at the Pyramid program, staffing and average caseloads are disproportionate for most schools. FCPS is recommended to take a deep dive into program location, caseload numbers and staffing allocations that are excessive and may be used more effectively in other aspects of special education programming in FCPS.

Feedback from parent focus groups participants shared concerns with how specialized programming decisions are made. Parents expressed the need to provide expanded programming in more schools and the impact decisions had on families:

- One parent wants her child at the same school as her sibling, neighbors, and people that know the child, and not at a different school. This parent believed students should be able to receive what they need in their home school.
- Another parent indicated their child cannot attend their home school because the school cannot support them. The parent drives her child to another school because they are known for their special education services.
- In addition, one parent is puzzled by why the quality of special education services depends on what school site to which the student is assigned.
- Finally, another parent states that there are "no options" for programs. There are too many limitations to access programs.

This sentiment from a survey respondent sums up the need for consistency throughout FCPS: *"There needs to be more consistency around the county ...it should not be wildly different depending on the school/program."*

There is a reported desire to localize programming for special education at each school as program moves happen all too frequently. This disrupts the ability of siblings to be educated together and for students with disabilities to foster meaningful relationships within their communities. On the other hand, due to the vast square mile land mass of Frederick County, it is not realistic to expect specialized programs to be available at each school. Rather, the focus is on building the overall capacity of staff for students in their home schools, either through inclusive practices or resource services. When appropriate, a continuum of services for students in specialized programs should be offered in select schools to limit the number of transitions a student with moderate to significant needs experiences.

The special education continuum of services in FCPS meets the needs of many students with disabilities; however, a detailed look into how and when staffing is adjusted is needed. In addition, the continuum of services for general education students needs some attention. There has been disproportionate attention given to the specialized programs and the programming and staffing require adjustments to have the ability to offer more programming for students who are currently not being served with intention.

Behavior Services

The following behavior section details the continuum of behavior supports from MTSS through specialized special education supports.

MTSS Behavior Interventions

The FCPS MTSS framework which includes a focus on behavior and academics offers schools guidance and strategies to deal with interfering behaviors within the school and classroom. The focus areas in this guidance document related to behavior include:

Positive Behavioral Supports: Each school is required to implement a PBIS program in their schools fostering a common behavioral expectation within the school environment. Throughout the school year each school should actively teach and promote positive behavior expectations. A plan for whole school positive behavioral support must be included in the School Improvement Plan.

Restorative Practices: Restorative practices include proactive schoolwide strategies to create a sense of community, build healthy relationships, and develop conflict resolution skills, a sense of belonging to provide a safe environment for people to exchange thoughts and resolutions.

Social-Emotional Learning: FCPS requires each school to teach social-emotional skill building and are provided with a curriculum to follow.

Trauma Informed Instruction: Trauma informed approaches to teaching and learning foster a sense of understanding and empathy. It ensures for those individuals who have experienced trauma will feel safe and secure.

While all these practices are necessary to deal with the challenges schools face each day, these strategies alone do not deter issues staff are expressing frustration within the general education learning environment. The settlement agreed upon with the DOJ regarding restraint and seclusion practices of students with disabilities has placed a primary focus over the past several years on the social and emotional needs of students who require more intense specialized programming. FCPS has initiated implementation processes, training in proactive response strategies, restorative practices, and de-escalation strategies providing staff with proactive intervention to address student behaviors. In theory this approach may address some student behaviors; however, focus group data and survey responses reveal staff continue to feel unprepared and overwhelmed by the frequency of daily interruptions to teaching and learning.

FCPS is intentional with dedicated guidance for behavioral support. The chart below outlines the supports identified in the FCPS MTSS framework.

Exhibit 43. MTSS-Integration and Alignment
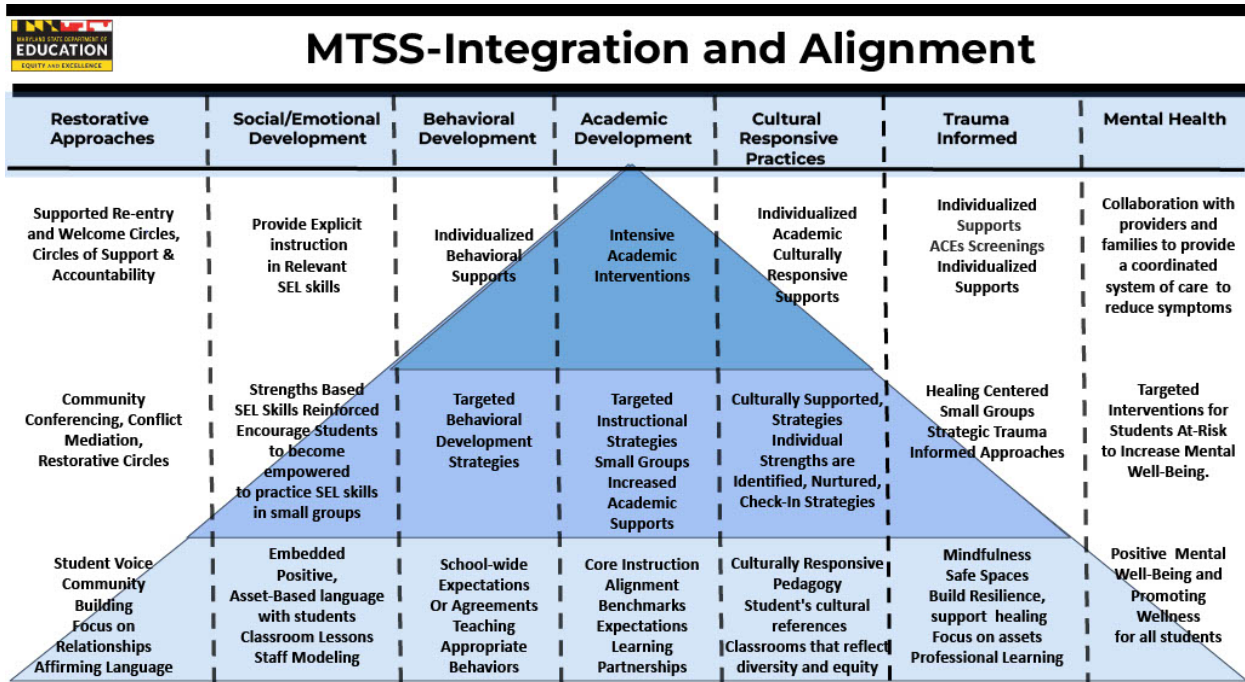
General Education Programming/Behavior Supports

FCPS focuses on teamwork and collaboration amongst administrators, general educators, behavioral specialists, interventionists, special educators, guidance counselors, school psychologists, school social workers, and other members of the school's core teams for MTSS. Through the already established *Student Support Team* process these teams should be working cohesively to collaborate in evaluating referrals for behavioral support, developing behavior intervention plans based on a functional behavior assessment, monitoring progress, and altering interventions and placement options based on demonstrated student needs. Ongoing consultation and plan adjustments are crucial to student success.

The survey addressed three specific statements for participants to respond related to behavior:

1. Our school provides sufficient Tier 1 general education behavior intervention support.
2. There is a well-articulated approach to address the behavior needs of students with disabilities.
3. Students with IEPs have adequate services in place to manage challenging behavior in the classroom.

For the first statement, survey results are quite diverse in their agreement or disagreement based on the relation between the all staff results and specific staffing groups. Tier 1 intervention support respondents are evenly split with 62 percent agreeing and 29 percent disagreeing. Taking a closer look, the subgroups of special education teachers, general education teachers and student support services professionals all aligned closely with the overall results, unlike the school administrator results where 74 percent of participants agreed they have sufficient Tier 1 general education behavior intervention support. What explains the disconnect between classroom staff and school administrators? One could assume school administrators are not acutely aware of the magnitude of behavior difficulties teachers are experiencing in the general education classroom. Additionally, throughout our analysis we are suggesting FCPS take a deep dive into the current placement of students based on their educational needs to assess the extent to which student behaviors are manifesting due to insufficient supports.

Focus group feedback supports the notion students are struggling with mental health and behavior concerns manifested in the general education classroom on a consistent basis, often with a significant impact on the general education students and staff. Some examples from the staff survey below share the struggles being experienced in general education classrooms.

- *I often evacuate my classroom due to destructive and unsafe behavior. I understand I cannot escort the student out of the room, but it is not fair to my 25 other students must go isolated in rooms with no chairs, desks, or learning materials while the student is left to destroy my belongings and student work.*
- *When students are included in the general education classroom who have extreme behaviors which disrupt the class and affect the other students, it seems the needs of a student with an IEP are placed above the rest of the class. It can be very traumatic for other students to witness aggression, screaming, things being thrown etc. Most teachers are not trained to deal with extreme behaviors and at times it is just as traumatic for teachers as it is for students.*
- *Extreme behaviors (violence toward others/self, running, destruction of classroom/property, unsafe behaviors-throwing/climbing on objects) have increased over the past couple of years. Some of the students receive a BIP and IEPs, but many typical peers experience severe disruptions and traumas while or during that process. How can we help these students learn to manage their behaviors and not negatively affect the other students mentally and academically?*

Several respondents shared how difficult it is retaining staff under the current teaching conditions in FCPS. Additional details about recruitment, retention, work conditions and staff wellbeing are included in the Human Capital section later in this report. Training on managing behaviors was also a topic of conversation and is addressed in the same Human Capital section.

The second survey statement above focuses on whether there is a well-articulated approach to schools addressing the behavior needs of students with disabilities. Like the results from the first statement special educators, general educators and student support services professionals aligned closely with the all staff results where 45 percent agreed, and 47 percent disagreed with this statement. The outliers were special educators sharing a much stronger opinion of disagreement with 57 percent. Conversely, school administrators again show a clear disconnect with other staffing groups with 74 percent agreeing there is a well-articulated approach to addressing behaviors for SWD. We have heard from participants in many forums where school level decisions are being made to remove special educators from their case management responsibilities to cover behavioral issues on a regular basis. One could assume the administrators are making these decisions and therefore believe this decision-making process is addressing behaviors of SWD. The ramifications of these decisions can have a detrimental impact on school culture and legal implications.

Staff survey comments echo their frustrations with managing behaviors and a lack of staff support in the general education setting:

- *We need more support for behavior… right now and teachers, paras, and admin are pulled away too much to deal with bad behaviors at the risk of academics.*
- *We simply do not have enough staff to support all the needs of students with IEPs in the general education setting. There has been a significant increase in students with autism and intellectual disabilities who are on diploma track. This means they must have access to the general education curriculum, but these students often become behavior issues since the structure of general education is not what they need.*
- *We do not have enough behavior support in our county. Period. Case managers are missing services, running themselves ragged to assist with dysregulated students.*
- *Special educators are spending so much time responding to behavior calls they do not have time to provide services to their caseload students.*

Lastly, the survey asks participants to respond to whether students with IEPs have adequate services in place to manage challenging behaviors in the classroom. Consensus came from special educators, general educators, students services professionals and school administrators with 41 percent

agreeing and 52 disagreeing. School administrators as the one outlier strongly opposed with 61 percent disagreeing that adequate services were present for students with disabilities.

Specialized Programming/Behavioral Supports

Students with disabilities who require more intensive behavioral support during the academic day can receive specialized instruction and related services within a self-contained classroom or school. Specifically, FCPS offers three options of specialized programming to support the most intensive behavioral needs through the Expressions program, Pyramid program, and Rock Creek School.

Exhibit 44. Pyramid Program Description

Pyramid provides integrated support to students with significant social and emotional needs. Intensive special education and therapeutic services are provided in a small, structured setting within a general education school. Students have opportunities for inclusion in general education classes with non-disabled peers, as appropriate, and are pursuing a high school diploma.

Exhibit 45. Expressions Program Description

Expressions provides integrated and enhanced special education supports for students with functional communication needs. Students are provided a variety of communication methods as they develop verbal speech and/or functional communication system in a small, structured classroom with opportunities for inclusion. The program uses a variety of instructional strategies and evidence-based practices, including principles aligned with Applied Behavioral Analysis.

Exhibit 46. Rock Creek School Description

RCS is a separate special education day school serving a diverse student body to include functional academics, medical and behavioral needs, for students ages 3-21 who have cognitive disabilities. While there is an emphasis on functional academics, to include communication, decision making, interpersonal, career/vocational, recreational/leisure and community-based skills. Instruction is also based on the Maryland College and Career Ready Standards.

The provision of specialized programming services and support is clearly articulated in the Standard Operating Procedures for Changing a Students Least Restrictive Environment. The purpose of this document clearly articulates for school teams the necessary steps with the support of central office coordinators on the considerations required to change the placement of a SWD. Data driven decisions are made by the IEP team to determine whether the student requires a more restrictive setting. In addition, each specialized program has entrance procedures detailing the criteria specific to each program.

Feedback through focus groups, interviews and open-ended survey comments highlighted the challenges of providing meaningful instruction and proper behavioral support to such a wide array of students. Throughout the study participants voiced concern about fidelity of implementation of each program, adhering to student profiles designed for each program, and the impact on the placement process. Specifically, they noted the following needs for additional supports:

- While L4L, Expressions and Pyramid are good programs, there are many students with needs that fall between those three programs and have nowhere to go. Instead, they are pushed into one of these three programs, and the programs have all lost their original intention.
- There is a need for more programs other than Expressions and L4L. There needs to be a program between Expressions and General Education. There needs to be an additional program for students who do not quality for Expressions or L4L.

While the addition of BCBAs has been a positive one, they are limited to only providing focused support to specific specialized classes. Schools could benefit overall from the expertise a BCBA has to build positive classroom cultures and deescalating behaviors.

To summarize, schools are struggling to address behavior difficulties, teachers do not feel prepared to manage behaviors, and all students deserve to be educated in a safe and supported environment. One can conclude with varying results the sufficiency of how current resources are being used, is there adequate training and support for schools, and are students in the correct placement with adequate support. Placement options for students are in question and do not meet the needs of all students, especially students with low incidence disabilities struggling to manage the demands of the general education classroom. FCPS will need to look at all programs holistically from a proactive stance and not reactive. The major focus of behavioral support hyper-focusing on specialized programs as part of the DOJ settlement has resulted in a negative impact on general education instructional programming. Ultimately, the fallout from the DOJ investigation has created learning environments within FCPS, filled with confusion, fear, mistrust and ultimately students and staff are impacted on a daily basis. Further investigation into all programming addressing behavioral services is critical.

Individualized Education Program (IEP) Development

> ➤ 94% of special education teachers
> ➤ 92% of general education teachers
> ➤ 88% of related service providers
> ➤ 91% of student support services
> ➤ 100% of school administrators
>
> FCPS staff agree that the IEP process involves collaboration between general educators, special educators, and parents.
>
> *Staff Survey*

According to the Maryland Statewide Individualized Education Program (IEP) Process Guide, the IEP is a written document developed for each student with a disability who is eligible to receive special education and related services. The federal regulations for IDEA specify the procedures school districts must follow to develop, review, and revise the IEP for each student.[34] A special emphasis is noted that every effort is taken within this guide on how local school districts can reduce any extensive length of IEPs, including unnecessary and add-on-paperwork. FCPS suggests their Special Education eHandbook contents, if used as intended, are in alignment with both the IDEA, COMAR, and FCPS policies and regulations related to the special education process.[35]

> ➤ 98% of special education teachers
> ➤ 98% of general education teachers
> ➤ 98% of related service providers
> ➤ 93% of student support services
> ➤ 15% of special education instructional assistants
>
> FCPS staff agree that they have been invited to participate in an IEP meeting.
>
> *Staff Survey*

While requirements in IDEA delineate when and how an IEP is developed; it is essential all members of the team to work in a collaborative manner on behalf of each student. Parents have valuable information to share about their child. As a team, families and practitioners need to develop a partnership in which each team member feels trusted, valued, understood, and respected.[36]

To support the perception of collaboration between parents and educators, 89 percent of staff surveyed agreed, the IEP process involves collaboration between general educators, special educators, and parents. Staff surveyed were asked what their school/district does well in delivering special education services, open-ended survey responses revealed positive reactions to this question which support the findings:

- My school supports students well. Both parents and general educators are part of the team, and we build strong relationships with families and work well together.
- The school listens to and communicates with the team including parents.
- I believe my school listens to parents during the IEP process.
- At our school, there is open communication between general educators and special educators to help reach all students.

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[34] 34CFR300.320-300.328
[35] https://marylandpublicschools.org/programs/documents/Spec-Ed/MITP/about/IEP_Process_Guide_Rev_January_2021.pdf
[36] https://www.pacer.org/parent/php/PHP-c259.pdf

- Staff at our school work collaboratively to support our students as best we can. We are in frequent communication and constantly planning together to support students.

> ➢ 69% of special education teachers
> ➢ 87% of general education teachers
> ➢ 48% of related service providers
> ➢ 66% of student support services
> ➢ 15% of special education instructional assistants
>
> FCPS staff agree they are given adequate time/coverage when participating in IEP meetings.
>
> *Staff Survey*

In addition to responses on collaboration in the IEP process, FCPS staff were also surveyed to determine: 1) If they were invited to participate in IEP meetings, and 2) if they were given adequate time and/or coverage to participate in IEP meetings. Overall 76 percent of participants reported they had been invited to participate in an IEP meeting. The overall percentage was impacted by only 15 percent of SEIAs agreeing they had been invited when compared with other participant groups. The percentage was the same for SEIAs when responding if they were given adequate time to participate in an IEP meeting. Although not a required member of the IEP team it is important to seek feedback from SEIAs, especially in certain situations when they are spending most of the time with the student. In response to the question, "I am given adequate time/coverage when participating in IEP meetings", only 62 percent of respondents agreed with this statement. The overall percentage was lowered considerably with 28 percent of special education teachers and 38 percent of related service providers disagreeing. One of the most startling discoveries of staff surveyed is 59 percent of special educators, related service personnel and school administrators disagreed with the statement that they have adequate time/coverage is provided to develop IEPs.

Using the Golden Thread framework and Quality Indicator Review protocol, PCG randomly selected and reviewed approximately 75 student IEP files to assess the overall quality of the content of IEPs developed by FCPS. Files reviewed were a representative sample of preschool, general education, and specialized programming IEPs throughout the school district. The reviews and analysis were conducted through a combination of focus group file reviews as well as using the PCG file review protocol, which is aligned with the Golden Thread Framework. More information about the Golden Thread Framework and the indicators used for the evaluation can be found in the Appendix.

A narrative summary is included below as evidence for each indicator.

Exhibit 47. Quality Indicator Review Findings: Present Levels of Academic and Functional Performance (PLAAFPs)

Present Levels of Academic and Functional Performance (PLAAFPs)
Strengths
- Behavioral and speech sections of the IEP were rich with data charts and understandable explanations which are parent friendly. - Standardized evaluation tools were at times used to evaluate present levels of functioning. - Areas addressed in the PLAAFP were directly connected to the areas affected by disability.
Opportunities
- The PLAAFP was often not written in parent friendly terms, especially when scores were reported without explanation. - Narrative explanations in the PLAAFP were minimal and often lacked relative data to support the annual goal. Overall, the amount of data entered varies widely, which is true for both quantitative and qualitative data sources. - Parent input was often brief and not connected to the student's documented areas of need. - Math was generally described with scores from classroom assessments and minimal to no narrative.

Exhibit 48. Quality Indicator Review Findings: Measurable Annual Goals

Measurable Annual Goals
Strengths
- Overall goals are aligned with academic and behavioral needs documented in the PLAAFP.   - IEP goals were consistently written in the Specific Measurable Achievable Relevant Time-Bound goal format.   - IEP goals were consistently aligned with the student's areas affected by disability.
Opportunities
- Objectives related to annual goals were inconsistently measurable.   - The degree to which goals and objectives were measurable was dependent on the role of the professional writing them (i.e., teacher versus related service provider, etc.)   - type of professional writing the goals and objectives was dependent on whether they were measurable.   - Lack of clear guidance on appropriate goal creation, length of time of a goal, and progress monitoring.   - Transition planning was not fully developed for every student who meets the criteria.   - Math goals and objectives appeared in various files, as not meeting the expected requirements.

Exhibit 49. Quality Indicator Review Findings: Services and Placement

Services and Placement
Strengths
- Overall, services are aligned with areas affected by the disability.   - Services and placement are aligned with the necessary supports the student requires.
Opportunities
- An overabundance of supplementary aids are included in the IEPs. From one participant's personal experience, there were over 15 and it was hard for teacher to implement to the extent that none of the supplementary aides were being utilized.   - Consultative services are embedded in the IEP under accommodations and are not delineated in services. This may be confusing to parents and not transparent as no specific time or frequency is noted.   - Supplementary aids and services included in daily instruction as part of a specialized program are documented when all students should be getting these supports as part of the specialized programming.   - Overall, services are not consistent from one school to the next. Some students are served 5 days a week and others 4 days a week. The services are not specific enough, so parents understand what area of need is being addressed.

Exhibit 50. Quality Indicator Review: Progress Reports

Progress Reports
Strengths

- In general, progress reporting was completed in a timely manner.
- Behavioral staff reported progress in a manner parents could understand with detailed information related to the goal.

Opportunities

- Occupational and Physical therapy progress reports are documented separately and sent home to parents.
- Inconsistent demonstration of progress reporting which included specific data, stated in measurable terms with a narrative explanation for parents to understand how the student is progressing on the goal.
- Overall progress report comments were brief and did not demonstrate to parents how the strategies implemented in the classroom impacted overall progress on the goal.

Overall Comments

- There are inconsistencies with IEP development especially related to measurable objectives relating to the goal.
- Progress reporting does not appear to have district-wide requirements to include both qualitative and quantitative data sources.
- IEP paperwork generally does not align with grade level requirements stipulated for an IEP. For example, a preschool IEP includes state testing and transition paperwork required for older students.

The analysis of the IEP file review reveals IEPs are not consistently developed throughout the school district. FCPS eHandbook provides compliance guidance from Child Find, through eligibility to IEP development. There appears to be a missing link between guidance and the practices of staff in the development of IEPs. Although there are three IEP Facilitator positions in central office, these positions were reported to take on other duties unrelated to their role in FCPS. A general observation among files viewed found some IEPs to be upwards of 50 pages. An overwhelming amount of feedback from all data sources was the extensive amount of paperwork and time involved in developing an IEP in FCPS. This fact alone has led some special education teaching staff to reconsider their professional path forward.

> - 82% of special education teachers
> - 66% of general education teachers
> - 84% of related service providers
> - 67% of student support services
> - 83% of school building administrators

FCPS staff agree that student progress toward IEP goals is analyzed and discussed regularly by his/her teacher and/or related service provider.

Staff Survey

These findings suggest an effectiveness review of the online IEP system currently implemented in FCPS and further analysis of additional paperwork requirements set forth by the special education central office staff. Furthermore, IEP development team meetings and student progress conversations should be integrated into the procedural guidance by FCPS.

FCPS staff were surveyed to determine their understanding of what is documented within a students' IEP. Overall, 89 percent of participants agreed they are familiar with the contents of a student's IEP. In addition,

> - 99% of special education teachers
> - 90% of general education teachers
> - 98% of related service providers
> - 87% of student support services
> - 80% of special education instructional assistants
> - 100% of school building administrators

FCPS staff agree that they understand what is documented within students' IEPs.

Staff Survey

21 percent of all respondents disagreed that student progress toward IEP goals is analyzed and discussed regularly by his/her teacher and/or related service provider(s).

Focus group members were very clear how overwhelmed they are with the process of developing IEPs and how coverage to complete paperwork is taking time away from delivering special education services.

The following feedback was shared during conversations with staff:

- Writing quality IEPs can be a challenge and I wish we did not have to click into each entry and change every little detail when writing IEPs.
- It takes 3 or 4 hours to write the IEP before a meeting, this does not include going in after the meeting to make changes, notes, etc.
- It is overwhelming to write IEPs, and we must make sure the dates are accurate and all the boxes are checked. It takes a tremendous amount of time to do this. Teachers are allocated 90 minutes a week for paperwork, but this amount of time does not come close to the time needed.
- The format of the online IEP system looks nothing like the printout. Information we enter in the interface makes more sense than how it actually prints out.

> ➢ 75% of preschool parents
> ➢ 56% of elementary school parents
> ➢ 46% of middle school parents
> ➢ 40% of high school parents
> ➢ 52% of all parents
>
> FCPS parents agree there is an adequate number of staff to implement my child's IEP with consistency.
>
> *Parent Survey*

One key finding of this study is the overwhelming disagreement among all respondents that there is an adequate number of staff to implement student IEPs with fidelity. These data align with referenced respondent comments that staff is being pulled in many directions, for example, being assigned as a full-time intervention teacher, taking the special educator away from serving students on their caseload. Several staff voiced other concerns as they relate to the inability to implement student IEPs with fidelity including caseloads being too high, staffing shortages, and special educators being pulled away from the classroom to handle behavioral issues.

> ➢ 26% of special education teachers
> ➢ 31% of general education teachers
> ➢ 30% of related service providers
> ➢ 35% of student support services
> ➢ 38% of special education instructional assistants
> ➢ 35% of school building administrators
>
> FCPS staff agree there is an adequate number of staff to implement student IEPs with fidelity.
>
> *Staff Survey*

Focus group participants shared specific feedback on the significance of district-wide concerns impacting the ability of staff to implement IEPs with fidelity:

- "Assigning paperwork time during the week takes away from serving students."
- "Staff cannot meet IEP hours because caseloads are too high."
- "Special ed teacher was pulled to be a 1:1 for a student for a week and no other students received services."
- "Classroom student hours are not being met."
- "Special education staff are pulled to cover other classes or are in meetings."
- "Special ed teachers are given a day to not teach to do paperwork. No coverage in the co-taught classes is given. Students are not getting their accommodations."
- "We have several co-taught classes, but the special education teacher is rarely in the room."

> ➢ 55% of special education teachers
> ➢ 33% of general education teachers
> ➢ 56% of related service providers
> ➢ 35% of student support services
> ➢ 52% of school building administrators
>
> FCPS staff agree related service providers can meet the service times of all students on their caseload.
>
> *Staff Survey*

When staff were asked the question "Related service providers can meet the service times of all students on their caseload?" just over half of special educators (55%) and related service providers (56%) agreed.
Based on the results of the survey, the staffing model for related services is worth exploring to ensure related service personnel are adequately staffed to meet the needs of students with disabilities.

IDEAs provisions regarding parent participation state:

> *Each public agency must take steps to ensure that one or both of the parents of a child with a disability are present at each IEP meeting or are afforded the opportunity to participate*

> *[300.322(a)] This includes, 1) notifying parents of the meeting early enough to ensure that they will have an opportunity to attend; and 2) scheduling the meeting at mutually agreed on time and place. [300.322(a)(1)]*

Parent and community focus group members shared the following concerns regarding compliance with the above regulation:

- FCPS allows one hour for IEP meetings. Families are not feeling. It is hard to have a real conversation and feel heard within 1 hour. This means families must have several IEP meetings a year to finish the process.
- It is always a "reschedule." Families feel they are being told there is another family waiting because the meetings are all scheduled on one day.

Parent participation in an IEP meeting is not just a matter of adhering to regulations. It takes a concerted effort to engage parents in a meaningful way as equal partners in the IEP process. Timely communication and an adequate period of time to consider parent input is essential to student success.

Compliance

The most significant compliance concern for FCPS is the DOJ, Civil Rights Division, Educational Opportunities Section, investigation which began in October 2020 and concluded in December 2021 with a settlement agreement. It was determined FCPS improperly secluded and restrained students with disabilities, failed to use appropriate behavior interventions and failed to train and hire appropriate staff. During the most recent reporting period July 2022 to January 2023 FCPS has conducted six conference meetings with DOJ staff to monitor compliance in accordance with the settlement agreement.

The following highlight the most notable areas in this report:

BCBA Assignments: As of December 2022, the district has assigned one BCBA in each school where self-contained programs are located. Overall, 15 BCBAs have been hired to support programs including but not limited to Rock Creek, Pyramid, and Expressions programs throughobut the district. However, two schools did not have a BCBA employed in the position (i.e., the position was vacant).

Restraint and Seclusion: As of the first updated report in January 2022 all seclusion practices have ceased in FCPS. Restraint practices are permitted under emergency circumstances when necessary to protect a student or other person from imminent, serious, physical harm after other less intrusive interventions have failed, or been determined inappropriate.

Reporting/Regulation: Since the inception of the settlement agreement with the DOJ, FCPS has implemented a "Physical Restraint/Seclusion Incident Report" electronic form which requires timely submission and is reviewed by the supervisor of the BCBAs. In addition, Regulation 400-44 "Restraint and Exclusion Practices" has been revised to include a detailed explanation of who and under what circumstances the debrief meeting will be conducted.

Training: A significant number of training courses have been conducted as included in the settlement agreement. Most significantly FCPS is moving from Crisis Prevention Institute (CPI) to Mandt Crisis Prevention Training beginning in late January 2023.

During the 2020-21 and the 2021-22 school years, there have been no additional Office of Civil Rights complaints filed. In the fiscal year 2020-21, 13 due process complaints were received, two were settled with mediation, 10 were withdrawn for unspecified reasons and one complaint was found to be insufficient. In 2021-22, 19 due process complaints were received, three were withdrawn and settled with mediation and 16 were withdrawn for unspecified reasons.

Summary and Implications

Although the District has been notably compliant based on reports produced by Maryland for the State Performance Plan and Annual Performance Report, there is much more worthy of consideration. The district's involvement with the DOJ and corrections related to restraint and seclusion have left parents and staff working to rebuild relationships and trust within special education. This stems into all areas of the IEP process and procedures in special education from both an external and internal lens. While FCPS has many noteworthy areas regarding the comprehensiveness of special education evaluations that provide meaningful information, a continuum of services for students with disabilities, and strides being made to ensure BCBAs are hired to support special education programming across the district, challenges continue to exist as part of the current structures in special education.

These challenges include the following:

- Parents feel the district does not always adhere to the timelines for referrals and evaluations, and some parents do not fully understand the MTSS process as an intervention and instructional framework to support all learners, regardless of disability designation.
- Staff also expressed concern regarding the timeliness of the referral process and did not always feel their school teams understood the steps and timelines for the IEP referral process, although staff did feel the results of these evaluations provided meaningful information about student's educational needs.
- While many staff (62%) felt the district offered a continuum of services to meet the needs of all students, there was still a significant proportion of staff that disagreed.
- A review of IEPs indicated that PLAAFP statements in the IEP did not always have data to support the development of IEP goals and short-term objectives in IEPs were not always measurable depending on which professional was writing the objectives. Furthermore, it was noted there was an overabundance of supplementary aids included in the IEPs, which can be challenging to implement. It is important to ensure that supplementary aids and accommodations are individualized to the needs of the student and do not simply reflect good teaching practices, as those should be part of core instruction within an MTSS framework.
- Staff felt there was not adequate staffing to support the needs of students with IEPs, often citing concerns to being pulled to support in other classrooms with student behavior, having high amounts of paperwork to complete, and having to provide coverage when substitutes were not available which makes it challenging to see students on their caseload or provide appropriate push-in/co-teaching services.
- Parents noted IEP meetings often felt rushed and their concerns were not heard or fully considered by IEP teams.

It will be important for FCPS to develop systems and practices that meaningfully involve parents and caregivers in all aspects of their child's education to ensure success for students and collaboration among school teams. It is important to highlight of the parents who responded to the survey, most parents felt the IEP process was collaborative between general educators, special educators, and related service providers and many parents felt they had a good working relationship with their child's teacher. This is something for FCPS to build upon to ensure all parents share that same sentiment when it comes to collaborative practices between the district, schools, and families.

In addition to ensuring collaborative structures are in place, FCPS should also review current IEPs for consistent development throughout the school district. While the IEP is a critical compliance document that must be adhered to, it is also the tool used to measure student progress and adjust based on student needs and goal attainment. FCPS should examine the current structures in place for IEP writing and the current software and online systems used to manage IEP development to determine if they are effectively supporting staff in IEP development and compliance. Given a large percentage of staff (52%) disagreed there is effective and consistent communication between schools and district level staff indicates there is a need to develop consistent systems and structures to reduce inconsistencies in practices. Finally, developing a continuum of services that are individualized and intended to support students in their neighborhood school, not just another "program" will be important work for FCPS in the future.

V. LEADERSHIP AND ORGANIZATION

Strengths

- **Robust ACTT Team**. The ACTT team provides services across the District to ensure students with disabilities have the tools they need to communicate.
- **Speech and OT/PT services**. Parents value the related services provided to their children.
- **IEP Facilitator Positions**. FCPS recognizes the need for additional IEP meeting support in schools and has started to add IEP Facilitator positions.
- **Office of Special Education and Student Services (OSE&SS).** The OSE&SS unifies the Departments of Special Education and Student Services under one umbrella.

Opportunities for Improvement

- **DSE Organizational Structure**. The DSE organizational structure is viewed as confusing and not supportive to schools.
- **IEP Facilitators and Inclusive Practices Specialists**. There is a need for specialized support from the central office to assist with IEP meeting facilitation and building inclusive practices.
- **Strategic Vision**. Given the input from the Blue Ribbon Task Force and this report, the DSE is well positioned to now set a strategic vision and action plan for the department.

This section provides information about FCPS's overall district strategic plan and goals, in addition to an analysis of the special education leadership, organization and roles, and communication structures within the central office and with schools.

Strategic Plan

At the beginning of the 2022-23, FCPS's incoming superintendent established systemic goal areas to guide the district's priority work. These goal areas are aligned to the Board of Education's goals, thereby creating an aligned framework for improvement. For each of the goal areas, key performance indicators (KPIs) were established in collaboration with the Board of Education, the superintendent, the FCPS staff, and the community. According to the FCPS's website, the KPIs are monitored by staff and data presented on progress throughout the school year. KPI progress data have not yet been posted to the website as of the drafting of this report.[37]

The chart below shows the correlation between the goal areas and the Board of Education's goals.

Exhibit 51. Performance on System Goals

Goal Area	Board of Education Goal
Organizational Culture of Achievement	Goal 1: FCPS will equip each and every student to be an empowered learner and an engaged citizen to achieve a positive impact in the local and global community.
Operational Excellence	Goal 2: FCPS will hire, support, and retain staff who champion individual, professional, and student excellence.
Safety & Wellbeing	Goal 3: FCPS will pursue and utilize all resources strategically and responsibly to achieve identified outcomes and inspire public confidence.

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[37] https://www.fcps.org/strategic-plan

Stakeholder Engagement	Goal 4: FCPS will nurture relationships with families and the entire community, sharing responsibility for student success and demonstrating pride in all aspects of our school system.
Student & Staff Experience	Goal 5: FCPS will promote a culture fostering wellness and civility for students and staff.

Though Goal 3 is Safety and Well Being, the areas measured within it are dedicated primarily to assessing supports available to students with disabilities and those requiring intervention, specifically:

- Effective intervention strategies for all students
- Referral rates to special education
- Continuum of services for students
- Compliance

The KPIs for this goal are to:

- Decrease or maintain the percent of students with disabilities identified in each student group to mirror the student population (baseline 2022-2023).
- Decrease the number of 4th grade students who require intervention services each year (baseline 2022-2023).
- Decrease the number of years students who remain in intervention using a cohort model (baseline 2021-2022).

There are many data points that could be used to assess the extent progress is made in this goal area. As part of this review, FCPS may choose to expand upon or refine the KPIs measured to gauge not only this goal but other key initiatives more effectively.

The KPIs across the other four goal areas reflect the district's commitment to building staff capacity, high quality teaching, successful outcomes for learners, organizational effectiveness, transparent and timely community engagement, and student and staff safety.

Special Education Vision and Strategy

Vision and mission statements provide districts, departments, or schools with an overview of where they want to go and what they want to be.

- A vision statement is a collective expression of the district, department, or school's aspirations. A vision is concise and easy to recall.
- A mission statement provides an overview of the steps to achieve that future vision. A mission is lengthier and is the 'how-to' statement that helps district, department, or schools achieve their vision.[38]

Coupled with defined values, these statements are often used to guide strategy development, to align organizational improvement efforts, and to provide unity of purpose. They help establish clear expectations and standards for the whole community, and help the organization reach common goals. Having this type of clarity enables a district department, such as DSE, to make and implement strategic decisions affecting the future. The DSE is charged with ensuring students with IEPs have a free and appropriate education in the least restrictive environment. As stated on the FCPS website:

> Through ongoing collaboration with our local and state stakeholders, including parents, staff and students, the Department of Special Education serves FCPS by supporting systemic instructional programming focusing on eliminating the achievement gap, developing social

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[38] https://casn.berkeley.edu/wp-content/uploads/resource_files/School-Wide_Mission_Process.pdf

competencies, nurturing independence, and preparing students with disabilities to become contributing members of a global society.[39]

This statement could be described as the department's vision – it establishes a future and desired state of how services will be provided to students with disabilities and the intent of the supports, as well as outcomes. What does not appear to be defined though is a mission statement – an overview of the steps to achieve the future vision – nor the goals or action steps leading to fully enacting the vision. The DOJ settlement detailed specific steps the district needed to take to be compliant with the agreement. The Blue Ribbon Task Force report also provided concrete recommendations and next steps. Along with the recommendations of this report, DSE will be positioned to take these inputs and develop a comprehensive strategy that is clearly communicated to school and community stakeholders about the direction of the department and what will be provided to students with disabilities to help them succeed.

Focus group participants and survey respondents also shared feedback about the direction of the department and the need for a more proactive, strategic direction. Many shared that because of the attention and the resources needed to comply with the DOJ settlement, there has been an emphasis on compliance, rather than a holistic one centered on student outcomes as well. There is an underlying perception that special education is "broken" and stuck in the "status quo," but there is a strong desire among stakeholder groups to move to an innovative, forward-thinking mindset and for DSE and other senior leadership to help drive a new narrative around creating a "premier" special education program.

Special Education Leadership, Organization, and Roles and Responsibilities

Leadership Structure

Over the past several years, oversight of the DSE has undergone several leadership and organizational changes. For the first half of the 2022-23 school year, an interim Executive Director of Special Education and Student Services supported both units, though the Director of Elementary Special Education, the Director of Secondary Special Education, and the Director of Student Services officially reported to the Deputy Superintendent. At the beginning of April 2023, the Superintendent appointed an Acting Associate Superintendent of Special Education and Student Services. This acting appointment follows a national search conducted to find a permanent leader for the role.

Exhibit 52. Current Special Education and Student Services Leadership Organizational Chart
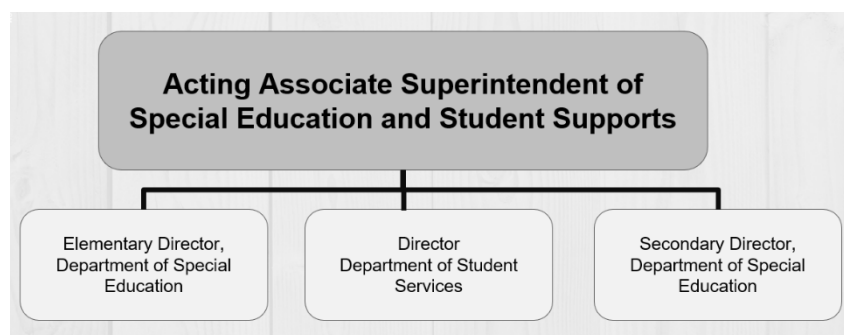
The plan to hire an Associate Superintendent of Special Education and Student Services has been publicly known for several months. Reportedly viable candidates applying for this position shied away from the role given the complexities of managing the DOJ settlement and compliance. As was stated in focus groups, the leader appointed to this position not only must manage the day-to-day functions of the departments but also establish a vision, begin to build a positive, proactive culture and climate in which trust among and between school staff and parents is paramount, and improve communication. Given these expectations, the Superintendent elevated the position from an

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[39] https://www.fcps.org/special-education

Executive Director role, as had been the case in the past, to an Associate Superintendent position. The role is currently filled with an interim appointment.

The plan to unify the Special Education and Student Services Departments under new leadership was commended by focus group participants. Many noted frictions between the departments and a hope that new oversight leadership will help to carve a collaborative path forward. One area of collaboration that has improved in recent months is the departments' work together on the DOJ settlement requirements. Psychological and behavior services are overseen by Student Services and focused on prevention and intervention for all students, regardless of student disability status, while Special Education is responsible for restraint and seclusion reporting. When incidences of restraint are reported to the DSE, Student Services now immediately follows up with alternatives and training for the school team. The vision for combining these offices and keeping them closely aligned to curriculum and instruction functions is to emphasize that good instruction is key to academic improvement for all students and to enforce shared accountability for all students.

Special Education Directors

The DSE is currently co-managed by two directors, one for elementary and one for secondary. The co-directors divide the responsibilities for the oversight of the office and supervision of staff. Part of the reason for this model is the area school directors are aligned by elementary and secondary. Having special education directors support by elementary and secondary conceptually enables better collaboration and unified school support.

There were mixed reviews among focus group participants about the effectiveness of having two special education directors aligned to elementary and secondary in this way. Some believe having two directors allows for better support for school leaders, as each director has a cohort of schools to assist, rather than needing to support 70+ schools solo. Additionally, together the directors bring combined specialized knowledge and experience to problem solve complex cases and implement an inclusive instructional approach with fidelity. Others suggested that for positions that support K-12, such as the Access, Equity, and Progress (AEP) Specialist, Adapted Physical Education (APE) teachers, and BCBAs among others, there is confusion among school staff as to whom they contact. PK-12 responsibilities, along with the budget and other operational tasks, are split between the two directors. This allows for greater bandwidth to perform their duties and support schools; however, it also leads to duplication of efforts when both directors may need to be at a budget meeting or SECAC meeting, for example.

As of the writing of this report, it was announced that as of July 1, there will still be two special education directors for FCPS. However, their work focus will be different. One director will focus on Pre-K to 21 support for students with disabilities in general education, while the other will focus on behavior and specialized programs.

Organizational Structure

The DSE has layers of supervisor, coordinator, and teacher specialist staff available to support schools. FCPS is a large school system, and the specialized roles that many staff have are necessary to ensure special education services can be provided and teachers are trained. DSE has worked over the past few years to create a structured team that is responsive to school needs and addresses the requirements of the DOJ settlement. Aligning all of these roles within the elementary and secondary structure though is akin to fitting a "square peg in a round hole," as many focus participants explained. Some positions, like coordinators for elementary and secondary instruction, closely align to the elementary and secondary split. Others though, such as speech and related services as well as behavior analysts, serve PK-12. The IEP Facilitator and the Access, Equity, and Progress (AEP) Teacher Specialist positions serve PK-12 but are overseen by the supervisor of secondary instruction and supervisor of elementary instruction respectively. The responsibilities for operational tasks, like budgets, purchases, and data analysis and reporting, are managed by the co-directors. The arrangement has led to confusion at times about who is the correct person to contact for various initiatives.

Below is an organizational chart that shows the breakdown of oversight responsibilities between the co-directors and the areas that each supervisor oversees.

Exhibit 53. DSE Leadership Organizational Chart, 2022-23
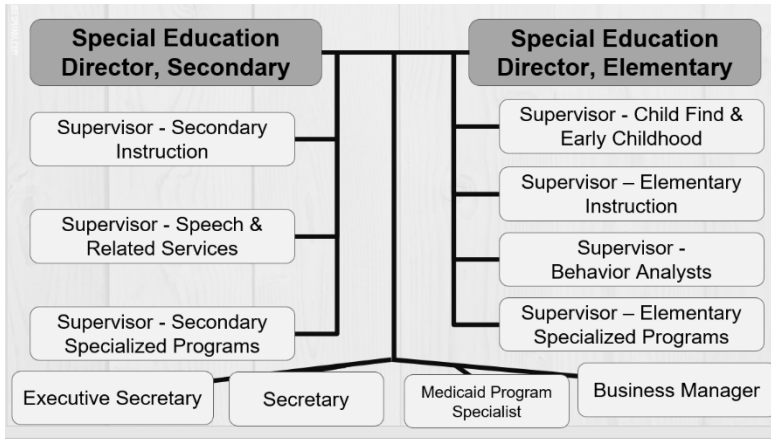
The following chart summarizes the roles of supervisors and their reporting staff.

Exhibit 54. DSE Supervisor and Reporting Staff

Supervisor – Child Find and Early Childhood Coordinator – Child Find (1 FTE) Child Find Teacher Specialist (3 FTE) Coordinator – PreK (1 FTE)
Supervisor – Elementary Instruction Coordinator – Elementary Instruction (2 FTE) Coordinator – 504 (1 FTE) Elementary Teacher Specialist (4 FTE) Access, Equity, and Progress (AEP) Specialist (1 FTE) Data Integration Specialist (1 FTE)
Supervisor – Elementary Specialized Programs Coordinator – Expressions, Middletown ES/Primary (1 FTE) Coordinator – Expressions, Carroll Manor ES (1 FTE) Coordinator – Expressions, Deer Crossing ES (1 FTE) Coordinator – Pyramid, Blue Heron ES (1 FTE) Coordinator – Pyramid, Lewistown ES (1 FTE)
Supervisor – Secondary Instruction Coordinator – Secondary Instruction (2 FTE) Coordinator – Nonpublic Placements (1 FTE) Coordinator – Interpreting Services (1 FTE) Secondary Teacher Specialist (2 FTE) Intervention Teacher Specialist (1 FTE) Nonpublic Teacher Specialist (1 FTE) IEP Facilitator (3 FTE) Transcriber (1 FTE)
Supervisor – Secondary Specialized Programs Adapted Physical Education Teacher Specialist (2 FTE) Coordinator – Expressions, Gov. Thomas Johnson MS (1 FTE) Coordinator – Pyramid, New Market MS (1 FTE) Coordinator- Pyramid, Gov. Thomas Johnson MS (1 FTE) Coordinator – Pyramid, Ballenger Creek MS (1 FTE) Coordinator – Walkersville HS (1 FTE)

Coordinator – Tuscarora HS (1 FTE) Coordinator – SUCCESS (1 FTE) Coordinator – Learning for Life, K-12 (1 FTE)
Supervisor – Speech and Related Services Teacher Specialist – Speech (2 FTE) ACT Team Leader (4 FTE) School-based OT/PT Coordinator (1 FTE)
Supervisor – Behavior Analysts BCBAs (16 FTE)[40]

Focus group participants and survey respondents, ranging from special educators to principals, to senior level district leaders, had considerable feedback to share about the organization of the office and roles and responsibilities. The following are a summary of their comments:

- FCPS position titles are confusing at times, making roles and responsibilities less clear.
- Central office roles are blurred. It's unclear how the role structure fits into the district.
- The design of the roles looks very different in practice.
- The addition of supervisors has added an unneeded layer.
- The coordinator role needs to be more clearly defined, as there are concerns it hinders efficiency, "muddies the water," and is redundant.
- Central office positions lack a clear delineation of duties and cross-training needs to occur.
- Roles and staff are siloed within DSE. There needs to be more collaboration.
- At times coordinators and teacher specialists seem to be doing the same job of "putting out fires."
- Response rates when other offices or schools reach out to coordinators can be slow. Sometimes it takes going to one of the directors to get a response.
- Central team members are skilled in what they do, but they are overwhelmed with individual cases and can struggle to see the big picture or to be focused on problem solving (often staying "in the mud").

On a positive note, the addition of elementary and secondary specialized supervisors this year was met with appreciation by school-based specialized program coordinators.

The overall sentiment is the DSE organizational structure needs to be redesigned to better serve schools and collaborate across departments. Depending on the size and scope of responsibilities of a special education office, districts approach their organizational structures in different ways. The common denominator of many organizational structures whose special education directors or executive directors deem successful is a hybrid of horizontal elementary and secondary instructional support coupled with vertical districtwide program leads for areas such as specialized programs and related services. In larger districts, there is usually also a consideration made to develop support teams, a cross-function of roles and responsibilities, that together serve a group of schools (driven by feeder patterns or regions). PCG recommends this approach for FCPS.

The following description serves as a model organizational structure. It is designed to drive elevating the instructional rigor and high expectations for students with disabilities in FCPS and is aligned with the recommendations in this report.

School Support

- Develop five regional school support teams. These teams would each serve on average 14 schools from two feeder patterns across grades K-12.
- Each regional school team should consist of the following roles:

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[40] A total of 17 BCPAs are planned for the 2023-24 school year.

- o Supervisor
  - ▪ Coordinator for Inclusion and In-Class Collaborative Instruction
    - Instructional Specialists (elementary and secondary)
    - Inclusion Specialist
    - Reading Specialist
- o BCBAs (beyond specialized program specific support)
- o IEP Facilitator
- o Specialized Program Specialist

FCPS may also want to align related service providers and ACTT team members with regional teams as well. This team would work as a unit to support their assigned schools.

Central Office

- Assign supervisors to the following functions and determine the appropriate number of coordinators/specialists needed to drive the vision and coordination of these areas districtwide.

Districtwide Instructional Initiatives

- Inclusive Practices and Professional Learning
- Related Services, ACTT, and APE
- Behavior
- Specialized Programs
- Early Childhood and Child Find
- Section 504 and Nonpublic
- Operations (Compliance, Data, Technology, and Finance)

In-School Support

- Over time, expand the role of the Special Education Program Coordinator (currently dedicated to school-based specialized programs) to support all students with disabilities in the school. Ensure each school has a dedicated school-based coordinator and/or department chair to coordinate and manage IEP meetings. This role could be split between schools if needed.

Roles and Responsibilities

The DSE has developed comprehensive documentation regarding roles and responsibilities of special education central office and school-based staff. Below is a chart for the 2022-23 school year with some of this information. As was noted above, though this information is available, focus group participants and survey respondents expressed that what is written or expected is not the same as what consistently occurs in practice for some of the roles listed.

Exhibit 55. DSE Roles and Responsibilities

Department of Special Education Instructional Program Roles and Responsibilities 2022-23			
This document is intended to provide assistance and clarification of support regarding primary contacts for questions and concerns regarding IEP process and implementation.			
Vision: Every school based staff member will have the skills, beliefs, and resources they need to ensure that students with disabilities achieve 100% of their IEP goals and objectives.			
Supervisor (Central Office)	**Coordinator (Central Office)**	**Teacher Specialist (Central Office)**	**Department Chair (School Level)**

• Interpreting the law to create and implement Standard Operating Procedures
• Defining policy and practice
• Ensure Accountability
• Staffing (i.e. Recruitment / Allocation)
• Interpreting district policy through the lens of special education
• Liaison with district admin and department leaders
• Liaison with MSDE
• Departmental communication (.e. Systemically, community, etc.)
• Monitoring effectiveness of programming at the district level
• Monitoring State Performance Plans
• Writing and Monitoring Grants
• Monitoring Discipline
• Liaison with admin to ensure building is engaged
  ○ Observations of teachers, as requested
• IEP Attendance
  ○ With legal representation
  ○ Placement Discussion
  ○ Placement Decision
• Student Cases and Observations
  ○ With legal representation
	Coordinator for Specialized Programs will be the primary point of contact for their assigned specialized program
	
	• Design systemic PD/PL
	  ○ Specially Designed Instruction
	  ○ County policy implementation
	  ○ County-Wide Professional Learning
	  ○ New Hire Training and Support
	• Design Tools and Resources
	• Liaison with admin to ensure building is engaged
	  ○ Observations of teachers, as requested
	  ○ Staff performance concerns, with support of Supervisor/Director
	• Offering feedback to specialists
	  ○ Departmental progress monitoring / student support and concerns
	• Tracking data/monitoring if programming has been implemented (county level)
	  ○ IEP Compliance
	  ○ Reciprocal Placement Determinations
	  ○ Special Education Process
	• Student-specific support identified via the *Office of Special Education Student Referral Request Form*
	• IEP Attendance
	  ○ With legal representation
	• Student Cases and Observations
	  ○ With legal representation
		• Design and deliver job embedded professional learning to support systemic and school-specific professional learning
		• OIEP Training and Support
		• New Hire Training and Support
		• Deliver Tools and Resources
		• Model implementation
		  ○ Specially Designed Instruction
		  ○ Special Education Process (school level)
		  ○ IEP Development and meeting consultation
		• Non-evaluative feedback
		• Monitoring progress
		  ○ Ongoing cycle of Progress Monitoring / Data Collection
		  ○ IEP Compliance
		  ○ Student Cases and Observations
		  ○ Teacher concerns / support
		• Student-specific support identified via the *Office of Special Education Student Referral Request Form*
		• Transition Activities (secondary only)- Support the development and implementation of SDI that supports transition activities and transition related IEP goals.
			In addition to the general department chair/team lead job description, the Special Education Department Chair/Team Lead specific responsibilities include:
			• Assist in master scheduling
			• Assign caseloads to ensure fidelity to school student IEPs
			• Assist program assistant to create master IEP calendar
			• Attend designated Office of Special Education department chair/lead meetings and facilitate train the trainer model at school-based department/team meetings
			• Identify and facilitate monthly school department meetings
			• Organize school monitoring for compliance audits
			• Participate in articulation meetings
			• Participate in move up IEP meetings
			• Other duties, specific to special education, as assigned by school Principal and Office of Special Education
			• Follow IEP Meeting Timelines

Central Office Positions

The following section recaps feedback from focus group participants and survey respondents on select roles within the central office. Discussion and information were not provided for all positions in the central office.

Coordinators

Role Definition and Qualifications

- No clear definition for what coordinators should be doing and what they should not be doing. For example, some specialized program coordinators provide substitute coverage while others do not. Some coordinators work within one building and others work across multiple buildings.
- There are discrepancies in coordinators' qualifications related to special education.
- Coordinators should have special education experience. It adds to the layers of complexity of serving students when the coordinator does not bring the right skillset and background to the work.
- Coordinators are central office special education staff and are hired by the district office. They do not report to the principal; they report to either the elementary supervisor or secondary supervisor of specialized programs. The role was designed to function as an intermediary between schools and central office.

School Support
- Prior to creating specialized program coordinators, the daily operations fell to the principal and AP. To provide more support for school administrators and provide specialized expertise in the buildings, DSE created the coordinator position. This model has been in place since 2017.
  - For elementary programs DSE was intentional about having one coordinator per specialized program. At the secondary level it is one coordinator regardless of the number of specialized programs.
- There are inequities between the type of support a specialized program coordinator can provide to a school versus an instructional coordinator.
  - For PK and elementary, there are 3 instructional coordinators to support all PK and elementary schools and 5 specialized coordinators to support 5 elementary schools.

- o For secondary, there are 2 instructional coordinators to support all middle and high schools and 6 specialized coordinators to support 6 middle and high schools.[41]
  - o There is 1 coordinator for Learning for Life that supports grades K-12.
- The elementary and secondary instructional coordinators assigned to buildings are not very visible given how many schools they support. School leadership does not always feel supported.
  - o As one participant noted: "at the central level there are few people who actually come out to the general education setting to support and see more than an observation every now and then due to time constraints. They aren't able to really see what happens every day and assist in training staff to support students prior to having to be in a specialized program."
- Specialized programs vary based on who the coordinator is. DSE has been working to create parallels and common expectations between programs now that specialized program supervisors are in place.
- Many coordinators agreed with the statement shared by one participant: "currently 90% of my day is spent being reactive/putting out fires. I feel it is not productive, nor is it a healthy place to live. The role should be opposite with most of the work being proactive."

Teacher Specialists

- Teacher specialists provide coaching and programmatic expertise and serve as model teachers for special educators supporting students in co-teaching or general education settings.
- They are often pulled in from their specialist roles into teaching positions temporarily due to staffing shortages. This has limited their capacity and ability to impact instructional change, support with writing IEPs, and resolving compliance issues.
- They are available to trouble shoot support needed for new special education teachers but are limited in their bandwidth to provide ongoing mentoring and support.
- School leaders wish there were more instructional support specialists to help in their buildings, especially around coaching and support in co-teaching classrooms.

BCBAs and Behavior Support Specialists

- As part of the DOJ settlement, DSE added BCBA positions for specialized programs. BCBAs monitor and track data, create Behavior Intervention Plans (BIPs), provide professional learning to staff, and attend IEP meetings.
- Behavior Support Specialist positions were reportedly eliminated following the addition of the BCBA positions but were then added back.
- At times there is confusion between the role of Student Services' Teacher Specialists, who can also provide intensive behavior support, when there is a BCBA in the building. Potentially both professionals are supporting the same student(s) in crisis. Some reported this seems inefficient.

IEP Facilitators

- The IEP Facilitator assists in gathering and organizing pertinent information as appropriate for each phase of the IEP process at assigned schools. In this process the IEP facilitator engages families in understanding and participating in each phase of the IEP process and invites appropriate participants to attend meetings. Additionally, the facilitator prepares and distributes agendas to appropriate personnel and monitors and updates referrals, assessments and other individual Special Education records. The facilitator helps keep members of a team focused on the development of the IEP while addressing conflicts and disagreements that may have occurred before or emerged during the meeting. The IEP facilitator as a neutral party helps to facilitate communication and the successful drafting of student IEPs in the IEP process.
- Three IEP Facilitator positions were added for the 2022-23 school year and report to the central office. Two of the three positions are currently filled.

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[41] Does not include the SUCCESS post-secondary transition program coordinator.

- The intent of these positions is to support schools, on a case-by-case basis, by chairing IEP meetings, monitoring prior written notice paperwork, etc. IEP Facilitators generally will not be assigned to provide this level of support for specialized programs since specialized program coordinators perform most of these duties in their buildings.
- Some feel having principals serve as the IEP chair presents a conflict of interest. By not carrying this responsibility, it would allow for "the principal to be the principal" and ensures the LEA duties, backed by special education knowledge, are completed within the confines of the law.
- IEP Facilitators also can provide special education context in the event of a manifestation determination and/or suspension or disciplinary actions. This allows for separation between special education and the school administration's disciplinary lens.
- Adding more IEP Facilitators could help alleviate the time special education teachers spend coordinating IEP meetings, especially in the cases where a student has 5-6 IEP meetings during the year.

Access, Equity, and Progress (AEP) Specialist

- The AEP Specialist is a grant funded position through the Maryland State Department of Education (MSDE). This role in FCPS was only recently filled, having been vacant for most of the year.[42] The focus of the AEP Specialist is to support specially designed instruction (SDI) in the LRE, meaningfully develop IEPs, and assess IEP implementation fidelity. This is done through desk audits/fidelity checks, specifically for BIPs and IEPs noting a change in placement on the LRE continuum.

Augmentative Communication & Technology Team (ACTT)

- The ACTT team provides extensive support to schools with communication tools for students and training support for school staff. Team members go onsite to schools to conduct assessments to determine student needs and the best approach to supporting their communication requirements.
- The ACTT website contains valuable information for school staff and parents and how ACTT team helps.
- There is a productive partnership between the ACTT and the Technology Department, which allows for devices to be provided for students quickly and in a coordinated manner.

School-Based Positions

The following section summarizes feedback from focus group participants and survey respondents on select school-based positions. Only positions for which staff and parents provided feedback are included here.

Special Education Teachers and Department Chairs

Intervention Support

- Many special education teachers lead intervention groups (especially if the special education teacher is trained in Orton-Gillingham), co-teach, and serve as case managers. Special education teachers leading intervention groups, in many cases, have students without IEPs and students with IEPs together in their groups.
- School leadership determines who teaches intervention groups.
- Because of school schedules, special education teachers may be overserving some students (e.g., staying to support a student for the entire 40-minute class, rather than the 20 minutes of service required per the student's IEP), and underserving others.

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[42] Access, Equity, Progress – Maryland State Department of Education (marylandpublicschools.org). As described on the MSDE website: "Research shows that students with disabilities learn and achieve more when they are taught with their typical peers. We believe that supporting students with disabilities is a school-wide general education priority."

Compliance Responsibilities

- All special education teacher focus group participants expressed that special education paperwork is overwhelming. There are many ways schools have tried to address this concern. One popular approach has been to have special educators provide services 4 days a week and complete paperwork and conduct assessments 1 day a week. Some believe it would make sense to hire a special education teacher to handle paperwork and assessments in the school, while others think this would create a disconnect as the special educator teaching the student has the most knowledge of their capabilities and progress data would inform assessments and IEP goals.
- Special education teachers are pulled to fill in many gaps and act as a "a catch-all" for "random tasks" such as test proctoring.
- Department chairs who are teaching, case managing, mentoring new teachers, helping teachers understand state legal requirements, etc. do not have time for duties in the school (lunch, etc.) but are often asked to do them anyway. This reduces their capacity to provide services to students and fulfill compliance responsibilities.
- Though additional time has been built into schedules for collaboration during grade level professional learning communities (PLCs), special education teachers still are not able to appropriately plan with their peers. This is because most teach multiple grades and have more than one co-teaching partner.
- Many special education teacher focus group participants share they frequently do academic assessments and observations during their planning time and write IEPs on their own time in the evening.

School-Based Program Assistants (SEIAs)

Role and Duties

- Though FCPS has developed ample documentation and provided training on the role and duties of SEIAs, it was a theme among focus group participants that there needs to be more clarity around the role of the SEIA and how SEIAs are utilized. Further, SEIAs believe there is confusion when it comes to what is expected of them and what they are trained to do.
- There is reported tension around work responsibilities, as the 11-month SEIAs dedicated to specialized programs are not able to be pulled to cover other duties in the building, while all other SEIAs are required to take on additional duties.

SEIAs/Special Education Program Assistants

- Program Assistants work alongside the Special Education team to help ensure compliance of timelines regarding IEP meetings and documentation requirements. Schools may have different roles and/or responsibilities for the special education program assistants. The primary duty is to schedule meetings and complete admin tasks, though the role can be deployed to cover shortages/classroom responsibilities.
- Duties could include creating a Master Schedule for IEP Meetings and working with parents to schedule IEP meetings, creating IEP Meeting Notices, creating and sending Invitations Parents/Guardians to the IEP Meetings, scheduling interpreters for IEP Team Meetings, submitting Indicator 11 documentation monthly, supporting case managers with uploading IEP documents, gathering student data, filing hard copies of signature sheets, and providing coverage during IEP meetings for teachers or SEIAs.
- Most schools receive an allocation of 1.0 SEIA Program Assistant.

School Psychologists

- The scope of the work for school psychologists is varied and can change depending upon the demands of the school. They conduct testing, write reports, counsel students, conduct observations as needed, participate in SST meetings, meet with parents, conduct observations prior to IEP meetings, manage student/behavior threat assessments and crisis situations (particularly in cases when a BCBA is not available).
- It is not unusual for school psychologists to have 6-7 IEP meetings in one week.

- School psychologists report to the department of Student Services, though they work in close collaboration with DSE staff as well.

Speech Language Pathologists (SLP)

- SLPs have a lot of "amazing" support from the SLP Teacher Specialists.
- There is a supportive network of clinicians (SLPs, OTs, and PTs) across the county and help is always available.
- There are 94 SLPs including contractors; 88 of whom carry a caseload.
- Parent survey respondents valued the services SLPs provide, highlighting them as "shining stars."

Collaboration and Communication Between DSE and Schools

Collaboration and communication between central offices and schools was a topic frequently discussed during focus group sessions.

An overarching theme of these conversations centered on the challenges around collaboration. School staff reportedly believe the district office is "far removed from the day-to-day" in schools and that there is limited visibility of central office staff in schools. Aside from specialized program coordinators, there is a perception that no one from the central office is "boots on the ground" visiting classrooms. Further, school staff said they do not feel supported or respected by central office staff. This sentiment likely generates from experiences school staff have had with central office staff coming out to do brief student observations and then providing recommendations via email that are sometimes unclear, too general, or unactionable. School staff also described limitations that the central office has around problem-solving or figuring out a solution. Often the answer is "no," rather than having collaborative conversations that empower schools and give them the opportunity to think creatively to support students.

Another concern is communication. School staff believe clearer, more consistent communication is needed. Communication reportedly became better and clearer after COVID, but there is more work to be done, especially when large announcements are made such as the introduction of new IEP forms. School staff described inconsistent information is often shared (i.e., when a teacher asks for guidance, two different answers are provided by two different people) and information is not clearly distributed (i.e., portions of a message trickle to schools, becoming a "game of telephone"). Now that FCPS has grown substantially in size, the district will need to adopt new methods of communication and help school staff understand how they can access information differently, perhaps using more of a "self-serve" model.

Summary and Implications

The value students with disabilities add to a school culture cannot be underscored enough, and FCPS has worked hard to develop the DSE to support the need. It will be critical in the future to develop collaborative structures where all members of the DSE understand their role in supporting the vision and mission of the department with clear action steps to guide that work. This will include ensuring the DSE aligns to the overarching strategic goals outlined by the district and develops a clear action plan that encompasses recommendations from this report as well as the Blue Ribbon Task Force. This will also require clear and consistent communication structures throughout the organization, both horizontally and vertically, so all staff members hear the same message.

To begin this important work, DSE will need to closely examine their organization's structure, roles, and responsibilities to ensure consistency of these roles. As it currently stands, roles and responsibilities appear to lack clarity and look different in practice than they do on paper. Staff also felt the roles within DSE were often siloed and that the organizational structure should be redesigned to better serve schools and collaborate across departments. Some staff felt the DSE were too far removed from the day-to-day work and did not fully understand the challenges at the school level. Some DSE members felt they were often operating in a reactive mode, as opposed to a proactive

mode to support meaningful change through coaching and collaboration with special education staff and building leaders.

It will also be important when examining each role within DSE to look for redundancy and gaps within the current structure. For example, it would be important to clarify the difference between what special education teachers and SEIAs can and cannot do to support the consistency of practices across the district. It will also be critical to look at the collaborative structures between district teams and from the district to the building level. One of the biggest challenges many districts face is having a special education department operate in a silo. This diminishes the ability to collaborate and often leads to the reactivity of the department or hyperfocus on compliance as opposed to instructional practices which are critical to creating a proactive model of support throughout the district. While we recognize the challenges that exist in creating these structures, shifting the focus of the DSE to address both compliance and best instructional practices can only be done through collaboration and a clear organizational structure in a coordinated manner.

VI. FAMILY AND COMMUNITY ENGAGEMENT

Strengths
Partners for Success (PFS). FCPS has a Partners for Success staff person to assist with parent questions and concerns.   **Office of the Ombuds**. The Ombuds also provides support for parents.   **Accessible Communication.** FCPS has prioritized providing accessible communication to families.
Opportunities for Improvement
Website. The DSE website has limited resources for parents, especially those who are non-native English speakers.   **Parent Advocacy Centers**. There is an opportunity to expand parent trainings and advocacy centers across the county.   **Clarification on PFS and Ombuds Roles**. The roles and responsibilities of the PFS and Ombuds staff, specifically how they work together, could be better clarified.

This section of the report summarizes findings from FCPS specific perceptions of family and community engagement.

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

- **Communication**: The extent to which parents are provided with useful information and communication throughout the process, can find consistent and reliable information about each process, and the extent to which the resources (literature, documentation, etc.) support the process.
- **Collaboration and Advocacy**: The extent to which stakeholders feel that their input is solicited, heard, and included, and how parents are approached to collaborate with school staff in a trusting manner.
- **Resources and Training**: The extent to which parents can access training and/or other resources offered by FCPS to support their understanding of special education law, IEPs, etc.

The data presented below are drawn from focus groups and surveys conducted with parents across FCPS. References to parents made in other focus groups are also included here.

Communication

The need for increased and proactive communication was a topic noted during focus groups and interviews. Several parents and other community representatives expressed appreciation for this special education review and the opportunity to share their opinions and experiences. They believe FCPS is open to and values parent feedback, which is a crucial step toward making progress after the DOJ findings.

Parents expressed a range of requests regarding communication and illuminated some inconsistencies between schools. Some shared they would like more communication from teachers, reading specialists, and other service providers about their child's progress, in that the annual IEP

and quarterly progress reports are not enough. Others shared, they receive work samples or weekly progress sheets on student behavior and participation or maintain a daily communication book with their child's SEIA and/or teacher. Applications ("apps") such as Classroom Dojo and Talking Points were mentioned as tools teachers and service providers use to communicate with parents. Central office staff acknowledged they need to give staff more guidance as to how to consistently communicate with families, especially with those whose children are non-verbal. Alternatively, some parents said communication from schools in general is too much. They requested one communication a week for less urgent updates, rather than several in a day, so that they do not miss anything.

> ➢ 92% of preschool parents
> ➢ 83% of elementary parents
> ➢ 85% of middle school parents
> ➢ 82% of high school parents
> ➢ 84% all parents

FCPS parents reported "yes" regarding their input being considered at IEP meetings.

Parent Survey

When surveying parents, the majority felt their input was considered at IEP meetings, with 84 percent of all parents responding "yes" to that statement. This indicates parents feel heard at IEP meetings even if the meetings are not always as long as parents would like them to be. In addition, parents were also asked if they felt comfortable asking questions at their child's IEP meeting. Again, most parents surveyed felt comfortable asking questions at IEP meetings, with 85%

> ➢ 92% of preschool parents
> ➢ 84% of elementary parents
> ➢ 87% of middle school parents
> ➢ 82% of high school parents
> ➢ 85% of all parents

FCPS parents reported "yes" to feeling comfortable asking questions at IEP meetings.

percent of parents responding "yes" to that statement. This indicates many parents do believe they have a voice on the IEP team. However, there are still opportunities to ensure all parents feel this way, as there is still a small percentage of parents that disagreed with these statements when surveyed.

> ➢ 68% of parents responded "yes."
> ➢ 6% of parents responded "no."
> ➢ 28% of parents did not require an interpreter.

FCPS parents' response to having an interpreter at IEP meetings if they needed one.

Parent Survey

Accessible Communication

As the student population in FCPS continues to diversify, focus groups highlighted the need to create additional resources and communication tools to communicate with parents who are part of the Deaf Community and who are non-native English speakers.

It was reported that in recent years the Deaf community population in the county has grown, and the district has increased resources to provide American Sign Language (ASL) interpreter access in school board meetings, IEP meetings, and other community events.

Resources to support parents who are non-native English speakers are reportedly limited and require more resources and organizational commitment. FCPS does provide access to interpreters for IEP meetings when requested. The following needs were identified to expand access:

- Create a streamlined process for parents to receive copies of the IEP in their native language. Not all IEPs are translated, and that process is time-consuming (30+ days to receive the translated version).
- Create better and more consistent structures for schools to communicate in other languages. Teachers often use Google Translate for notes and are unsure if this is allowable.
- Create a Hispanic community meeting forum to target support to Spanish-speaking parents of students with disabilities and respond to their questions, develop a network of family support, etc.
- Create an ombudsman resource specifically to support families of English language learners with disabilities and non-native English-speaking families.

While resources to support non-native English speakers were reportedly limited, most families responded to the parent survey noted they were asked if they needed an interpreter at IEP meetings. Of all parents surveyed, 76 percent reported "yes" to being asked if they needed an interpreter.

Parents were also surveyed about whether they had an interpreter at an IEP meeting if they needed one. Of the parents surveyed, the majority reported an interpreter was provided for them at IEP meetings, with 67 percent of families reporting an interpreter was provided when they needed one and 6 percent of parents reporting they needed an interpreter, but one was not provided. It will be important for FCPS to ensure all parents who require an interpreter at IEP meetings are provided with that support to meaningfully participate in the IEP process.

Lastly, parents were surveyed regarding whether interpretation at IEP meetings was helpful in understanding the information discussed. Of the parents that responded, 72 percent reported interpretation services were helpful, with 28 percent of parents reporting they did not require an interpreter. The shows families find value in having an interpreter to fully support their participation in IEP meetings.

Collaboration and Advocacy

Parents of students with disabilities in FCPS have several resources available to help them navigate questions they have or challenges they may experience regarding special education services.

Partners for Success

FCPS operates a Partners for Success (PFS) center servving parents and educational professionals for all Frederick County children and youth with disabilities ages 3 through 21. As noted on their website:

> For parents, Partners for Success offers individual consultation, an information and referral service, problem-solving assistance, training and supports. For educators, the program provides information about disabilities and support for making accommodations for students with special needs.[43]

PFS is operated by a Community Liaison under the direction of the OSE. The purpose of PFS is to enable parents and educational professionals to serve as equal partners in the decision-making process and to assist parents with accessing services for their children.

According to focus group participants and the OSE website, supports can include:

- Assistance with the IEP
- Seminars and workshops
- Newsletters
- Family outings
- Information about local and state parent organizations, and consultation.

PFS has created monthly newsletters with articles, resources, events, and updates and facilitated training in the following:

- A Time to S.H.A.R.E - support group for parents/caregivers of children birth through 21 years old with disabilities that meets once per month.
- Touch Chat and LAMP Assistive Technology Device Training
- IEP Process 101 Workshop
- Money Matters - supporting families in finding and securing financial resources/services for equipment.

PFS has also shared information with parents about these resources.

- Available trainings
  - o Depression in Teens webinar
  - o Coping Strategies for Kids with Anxiety and ADHD (partnering with NIMH)

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[43] https://www.fcps.org/special-education/partners-for-success

- Braille Lessons (online tutorials)
- MCF Western Maryland Family Leadership Institute
- Parents Place of Maryland- Preparing for Life After High School

- Information about community engagement
  - F.R.I.E.N.D.S. Valentines Dance
  - Kennedy Krieger Institute Adaptive Sports and Recreation Resources Fair
  - Teen Grief Group
  - Sensory Friendly Haircuts
  - Pathfinders for Autism Bingo
  - Adaptive Dance Class
  - Adaptive Open Gym
  - Sensory Friendly Valentine's Day Crafts and Fun
  - GTJHS Transition Fair
  - ARC of Frederick- Parent's Day Out
  - ARC of Frederick- Self-Advocacy Meeting
  - Maryland Youth Leadership Forum
  - ARC of Frederick- Futures Planning Event

Focus group participants referenced several needs. One is to provide parents new to special education with a guidance or orientation document about the evaluation and IEP processes and to facilitate connections to other parents who may be more experienced and/or whose child has had an IEP for several years. It was reported these informal connections occur outside of schools and the district avenues, often on parent run social media websites. A parent who is also an educator said even she felt overwhelmed as a parent working through the special education process with her child. Another said that, as a parent, she was unaware of the service delivery options available other than the program offered during the IEP meeting, and it was "intimidating to sit at an IEP meeting with 10-12 school officials." The PFS could be the resource to assist with these needs.

Though the PFS center is designed to represent special education issues and concerns of families, focus group participants highlighted the need to expand advocacy resources for parents through FCPS. One suggestion was to create advocacy centers, with the idea being to build capacity among families that goes beyond answering questions (i.e., to serve more as an advocate). Some suggested that these advocacy centers could be aligned to feeder patterns and be a tool to improve communication and trust between families and the district.

In the absence of additional district developed resources and trainings, focus group and survey participants shared parents are increasingly reaching out to external advocacy or legal organizations for information and assistance.

Office of the Ombuds

The Ombuds is a neutral person designated by the FCPS Board of Education to informally help provide options for resolution of an FCPS concern or issue. This office was created in 2019 and reports to the School Board. The Ombuds "fosters partnerships, builds relationships, and services FCPS students, families, staff, and community members, empowering them to thrive and work together. The Ombuds supports the Board of Education and wider community by analyzing FCPS data and suggesting ways to improve student achievement and enhance FCPS's organizational efficiency."[44] This office cannot receive formal complaints, conduct investigations, participate in litigation, or provide legal advice. Rather, the role is designed to listen, develop options, guide, and analyze data.

The Ombuds is viewed, as described by focus groups, as a resource for parents of students with disabilities sharing concerns about special education. While the role of the Ombuds is designed to be different from the Community Liaison with PFS, the roles should work in coordination and not be

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[44] https://www.fcps.org/ombuds

viewed as interchangeable. Some expressed confusion about when PFS should be contacted versus when the Office of the Ombuds should be contacted.

The Office of the Ombuds has seen an increase in the concerns raised by parents across the district. Overall, in 2020, the Ombuds heard 266 concerns; this increased to 352 in 2022. The percentage of cases specific to special education rose from 10% in 2020 to 12.5% in 2022, to 14% in 2023[45]. Common special education disputes that come to the Ombuds are around placement offerings and transportation, families not feeling heard or not understanding the special education process, and families not knowing their options when they do not agree with the IEP recommendations. Another significant area of complaint centers on reports of bullying, harassment, and intimidation. All conversations with the Ombuds are kept confidential unless the parent consents to sharing the information with central office or school staff or there is a threat of imminent danger.

There are anecdotal reports that the Office of the Ombuds has helped resolve many issues, thereby not having them escalate to a grievance or litigation. Surveys have been sent as a follow up to parents as well, but response rates have reportedly not been high. One participant shared that a measure of overall improvements in special education could be a reduction in special education concerns raised to the Ombuds.

Special Education Citizens Advisory Committee (SECAC)

FCPS has an active parent advisory committee that serves as a bridge between parents and community members, the FCPS school board, and FCPS district personnel. Full SECAC membership meetings occur monthly, though subcommittee meetings can occur more frequently. As described on the FCPS website, the:

> Frederick County Special Education Citizens Advisory Committee works in collaboration with students, families, FCPS staff, and the community to advise the office of special education and the Board of Education. The committee will focus on open and honest communication, improving effectiveness and accountability, advocating for appropriate resources, and identifying individual issues that may often be systemic. The committee will work together to put children first.[46]

Members consists of parents of children with disabilities enrolled in FCPS, FCPS staff members serving students with disabilities, high school students with or without disabilities and community members who have special knowledge or interest in the needs of special education students. According to SECAC's bylaws, the maximum membership is 28 voting members, comprised of 50% parent representation, 25% FCPS representation, 25% community representation and up to 3 non-voting student members.[47] Currently the SECAC membership is full and is not accepting applications. Members serve two years terms, though a member can apply for additional terms. When there are vacancies, interested individuals can apply through a membership request application. The chairs, secretary, and treasurer are elected by voting members. The Board of Education member and special education central office members are not voting members.

SECAC has several areas of focus for the 2022-23 school year. One area is to build its social media presence as a resource for parents and another is to provide accessible information for parents. For those who know of SECAC, its reputation is that of a "very strong group." Focus group participants acknowledged though that SECAC is generally not a well-known group in the wider community, and more could be done to build its visibility as a support for parents of students with disabilities. Another goal for this year is to be more efficient and effective. With only one large meeting per month, there needs to be a strict agenda and enough time set aside for the special education directors' comments. Deciding on business matters and making progress on them reportedly continues to be a challenge given the group's construct.

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[45] These data were verbally reported to PCG.
[46] https://www.fcps.org/boe/special-education-citizens-advisory-committee
[47] SECAC bylaws cite 31 members, but the FCPS website notes SECAC membership is a maximum of 28.

Resources and Training

Website

FCPS offers a range of information for parents on the dedicated Special Education Parent Resources section of its website.[48] Resources include videos, brochures, and parent guides. One video was also provided in Spanish, but other documents are not available in languages other than English.

Several focus group participants requested an expansion and redesign of the website and offered a few suggestions:

- Make the website more user accessible by reducing the embedded links. Users struggle to find the information they need.
- Review posted documents regularly so that the most current documents on the website.
- Post additional resource guides about special education specialized programs (Learning for Life, Expressions, etc.) and share with parents how to access them.

Workshops and Trainings

Parents were asked a series of questions about resources and trainings on the parent survey. An overview of responses is included below.

When asked if:

- FCPS offers opportunities for parent training or information sessions about special education, parent survey respondents answered as follows: 44.1% - "I don't know"; 31.6% - "yes"; and 24.3% - "no."
- They have attended parent trainings or information session about special education offered by FCPS in the past year, the majority (93.7%) responded "no."
- Trainings they attended were helpful, 79.6% responded "I don't know." Only 8.9% responded affirmatively to this question.

The majority of parents (55.1%) responded they did not receive communication about training or were unaware of the training occurring. Of those who did, 18.1% indicated they received information from their child's teacher, 14.3% from a newsletter, 6.0% from the FCPS website, and 5.4% from social media. This data overall suggests parents are not aware of training opportunities that might be available to them, and that information provided by a child's teacher and in a newsletter are the best ways to share offerings in the future.

Parent Perspective

Parents also had the opportunity to share points of pride and areas for improvement in an open-ended question on the survey and during focus groups. The following themes emerged from those responses.

Points of Pride

On the survey, 219 parents responded included comments about what is working well in special education in FCPS. Responses were analyzed and determined to align to the following categories.

Satisfaction with Instructional Support

- "The co-taught math class provides the support my child needs and things are broken down for her."
- "I believe they really try different methods as far as what will work best with the student and how to make them successful in class work."

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[48] https://www.fcps.org/special-education/special-education-parent-resources

- "I think the staff and administrators are great. They mean well and genuinely try to educate my son and give him the accommodations he needs. Some of them seem to understand his disability and try different methods of addressing any behavioral issues, while other staff members need much more education in that area."

Satisfaction with Related Services

- "Speech Program is fabulous and Speech Pathologists great."
- "The speech teacher and special education chair go above and beyond to care for my child. Their communication and support are invaluable!"
- "My son's IEP is for speech language. He meets weekly with the Speech Language Pathologist. She does a wonderful job of creating a learning environment where students are excited to attend Speech. My son gets extra excited to attend school on "Speech Days." She is also kind, personable, and intelligent. She is excellent!"

Responsiveness of Staff

- "My child's case manager is an exceptional teacher, a good communicator. It makes my child feel safe and welcome."
- "I believe the staff is doing their best with the resources given by FCPS. Some of my child's teachers genuinely show concern if my child is not doing well."
- "The special educator is very responsive to my emails."
- "Overall, my experience is that my daughter's IEP team and teachers are great at reaching out and communicating with me regarding my daughter. I feel like they have made the effort to know my daughter and she isn't just another number."

Improvement Areas

On the survey, 229 parents responded included comments about what could be improved in special education in FCPS. Responses were analyzed and determined to align to the following categories. An illustration of responses by major category is included below.

Fidelity of Service Delivery

- "[The school] has been amazing with direct special education services from special education teachers. Unfortunately, there are multiple general education teachers that are actively unwilling to provide services even after meetings to address the noncompliance. That needs to be changed immediately. It is against the law."
- "My child's IEP needs to be followed period. As a result of her IEP not being followed, she is failing in 5th grade classes."

More and Better Communication

- "I do not receive updates from my child's Spec-ed teacher without me initiating the conversation. It seems like the data and information is held secret and I am only going to get information if a request it and not all the information pertaining to my child."
- "I do hope in the future there is more home/school connection with the skills they are working on. Some families would be willing to try to help their child at home but don't know how. It could be a quick activity to work on together."
- "More regular input from teachers about areas of improvement, progress, and how we can help at home."

Inclusion

- "Co-taught classes are rarely truly co-taught, because the special education teachers are tasked with too many other duties that do not relate directly to providing services in the classroom. Meetings, paperwork, and managing caseloads are all important and relevant, but these should be considered when scheduling (and hiring) special educators."

- "The program assumes disabled students should be in segregated settings and initially teachers refused to attempt any inclusion practices… they began with the assumption she could not fit in and did not belong and worked consistently to collect data to 'prove' that, regardless of her actual IEP goals."
- "We need more opportunities to teach other students about inclusion, disabilities, and how to interact with students with differences."

More Staff

- "Classrooms need to have less students for one teacher. Our teacher is not able to properly help my child because she has too many students and no aides."
- "There isn't enough support staff for all the special education children in the school. My own child doesn't get the support he needs consistently because of other children he shares the one support person with."
- "More classroom teachers! Smaller class sizes!"

Parent Voice

- "I do not feel like a valued member of the team and any issues or concerns I bring up are dismissed and not discussed. No one takes my concerns seriously and I would pull my son out of the school so fast if I had any other option. My son is not getting an education."
- "The parent to the child should be the most important member of the IEP meeting. Not everyone talks and you just listen because they don't care what you say."

Summary and Implications

Developing strong family-school partnerships is an essential strategy to improve student learning and promote equity to support every learner within the school community. The importance of this cannot be emphasized enough for all students, but particularly for families of students with disabilities as they often struggle to understand and navigate all the nuances involved in special education. Developing trust through open communication and collaboration with families will benefit all stakeholders within FCPS.

It should be noted that parents expressed gratitude toward FCPS for conducting this review and also the need for increased and proactive communication to build strong partnerships. Understanding the individual needs of each family and their preferences for communication will be helpful as inconsistencies were noted across schools. Many families expressed a desire to hear more often about their progress, aside from just progress reports and annual IEP meetings, while other families felt daily communication could be overwhelming and wanted a weekly update instead. In developing partnerships with families, it will be helpful to understand the best methods of communication and how often families would like to be updated. Building trust and rapport with families at the district, school, and classroom level will support rebuilding parents' faith and trust in the system, not just with individual families.

Parents surveyed noted points of pride within FCPS that included satisfaction with instructional support and related services, along with the responsiveness of staff when families reached out. Areas parents noted for improvement included the fidelity of service delivery, more and better communication, inclusive practices, more staff and smaller class sizes, and valuing parent voice in the IEP process.

Another area of note was accessible communication for families whose first language is not English. FCPS has increased resources for the Deaf community in recent years, however, there are still challenges for families that are non-native English speakers and their accessibility to IEP documents and home-school communication. This creates additional barriers for these families to engage with the FCPS in a meaningful way and advocate for their child's needs within the system.

FCPS operates a PFS center that bridges collaboration and communication for special education. PFS has provided several workshops, newsletters, resources, and events for parents and the

community. The majority of families, though, reported they did not receive communication about training or were unaware of any training that occurred. PFS helps families for IEPs and families shared some ideas on how to better utilize PFS moving forward which included guidance for new parents new about the special education process in FCPS, connections to other families in special education in FCPS, more information about the programming and services in FCPS, and advocacy resources to build capacity for families.

In addition to examining how the PFS center is utilized, parents also expressed confusion regarding the role of the Ombuds and PFS. Parents need multiple ways to gain support and resolve concerns in a non-litigious manner. Working with the Ombuds can be an important resource for parents. The district has an active parent advisory committee for special education (SECAC), which serves as another resource for families in the community.

VII. HUMAN CAPITAL

Strengths
• **Dedicated Staff**. FCPS staff were widely praised for their commitment to and care of students. • **Recruitment**. There is a multi-pronged recruitment approach to fill vacant positions. • **Professional Learning**. The district offers a wide array of professional learning opportunities for all staff. • **DOJ Staffing Requirements.** The district has made ongoing progress to abide by the hiring requirements established by the DOJ.

Opportunities for Improvement
• **Recruitment and Vacancies.** As of December 2022, over 10 percent of special education teacher positions remained unfilled. • **Staff Wellbeing and Safety.** Staff expressed significant concern about their own mental health and psychological and physical safety.

Human capital highlights the processes involved in investing in people from recruitment to retirement. All school districts, FCPS included, ensure highly qualified and effective staff have the skills/training needed to provide services and support to promote the success of diverse learners. The following section covers key areas in effective human capital planning, including an analysis of the extent to which the review team found evidence of high-quality staff, high-quality professional learning, equitable recruitment practices, staff wellness and self-care, and flexible career pathways and staff retention.

Many experts contend that "efforts to address shortages should be less about recruiting teachers generally, and more about recruiting and retaining the right teachers, in the right subjects, for the right schools."[49] In no place is this more critical than in special education. When special education teaching staff with the right skillset and passion are aligned to the right school and provided ongoing professional learning opportunities, they can have a significant and meaningful impact on student success.

Dedicated Staff

There is a common sentiment among teachers, leaders, parents, and others that FCPS staff are committed, caring, and hardworking. As one participant shared "across the board, staff seem to have the right intentions and their hearts are absolutely in the right place." When asked about what is working well in the district, staff across the board, from special education teachers to related service providers, to SEIAs, were consistently highlighted. They genuinely want to help and are passionate, with a kids-first mentality.

Recruitment and Career Pathways

In a system as large as FCPS, recruitment efforts are underway year-round and require active partnerships with local universities and professional organizations to fill vacancies. The district is cognizant of the needs of the changing workforce post-COVID and of the potential for tenured teachers to leave teaching at an increased rate in the coming years. There is also a priority placed by the Board of Education and senior district leadership on recruiting diverse staff. As the district's student population becomes increasingly diverse, it is FCPS's intent to have students see themselves in their educators.

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[49] https://files.eric.ed.gov/fulltext/ED582978.pdf

Recruitment Efforts

Similar to national trends, FCPS is experiencing challenges in filling special education related staff positions. The special education teacher pipeline has been a concern this year. Teacher specialists have been serving in teacher vacancy roles for portions of this year to ensure students receive their required special education services. This arrangement has reduced the central office's capacity to provide coaching and mentoring help to teachers across the system. Across the district, nearly one-third of all teaching staff is untenured, meaning they have been teaching in FCPS for less than three years, and over 100 teachers are conditionally certified. Open SEIA positions are reportedly attracting few qualified candidates, from 12-15 qualified candidates per open position in the past to just three per position this year.

Exhibit 56. Staff Vacancies by Role, December 2022

Position	Number of FTE District Employed Staff	Number of Vacant Positions	Total
Special Education Teachers	387	41	428
SEIAs	693	18	711
Psychologists	54	0	54
Speech/Language Pathologists	87	12	99
Social Workers	2	0	2

In recent years, FCPS has employed several strategies to recruit and retain general and special education teachers in the school system. They are described in the 2022-2025 Strategic Staffing Plan. Included in these efforts are the following programs currently existing in FCPS:

Grow Your Own Programs – An approach to developing a pipeline of educator candidates to meet specific workforce needs.[50]

- "Become An Educator" events are held for existing employees who may be interested in becoming general and special education teachers. Over 200 current employees registered for the most recent event in 2021.
- High School Programs – Events are held each year at high schools within the school system to discuss pathways to become a teacher as well as build relationships with the staff and students.
- Maryland Accelerates Program – A grant-funded partnership with Frostburg State University to increase the opportunities for college students to complete practicum and internship requirements in FCPS.
- University Partnerships – FCPS has formal partnerships with Hood College, Mount Saint Mary's College, and McDaniel College, all located near Frederick County, to increase the number of teaching candidates completing practicum and internship requirements toward teacher certification in FCPS.
- Support Staff Recruitment – Paraprofessionals in FCPS have an opportunity to enroll in degree programs to become certified general or special education teachers and receive 100% tuition reimbursement.

Recruitment Efforts

- Job Fairs have historically been held to recruit all teachers. These have increased at colleges and universities with special education degree programs.
- Job Recruitment Fairs are held specifically for teachers certified in special education or related fields.

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[50] Cushing, 2019

Several focus group participants stated it is imperative FCPS offer teacher contracts and competitive compensation packages as early as possible during hiring season to attract staff for the upcoming school year.

Staff Wellness and Retention

Teachers who are taking care of themselves are better prepared to take care of students. Teacher wellbeing is reflected in a positive attitude toward teaching that stems from supportive relationships with students and colleagues, the belief that one can teach effectively, and the feeling that one's personal and professional needs and expectations are met. The social, emotional, and physical health of teachers is a shared responsibility and a critical component of student learning and overall community wellbeing.

Students are affected when teachers feel burned-out and attrition rates are high. One study found that special education teachers who are burned-out can negatively impact IEP goal attainment and overall, IEP quality in addition to impacting overall student behavior, engagement, and outcomes.[51] In a 2015 study, researchers delved deeper into caseload sizes and teacher burn-out in an Alabama school district using the Maslach Burnout Inventory-Educators Survey. They found that special education teachers with 11-15 students on their caseload had the lowest rates of emotional exhaustion, while those with more than 26 students on their caseload had the highest rates.[52] Examining caseloads and workload in depth and striking the appropriate balance between available resources and student need is important if districts want to retain high quality special educators and positively impact educational outcomes.

FCPS has been focused on retention efforts, including:

- *Compensation Model* – FCPS has implemented a four-year teacher salary plan. Additionally, FCPS offers competitive salaries for Master's (and above) Degree candidates.
- *Benefits* – FCPS offers competitive benefits, including:
  - 95% of group benefits are paid by FCPS.
  - Dental and term life insurance fully paid.
  - Generous tuition reimbursement program which offers direct institution pay option.
  - Offer robust wellness program.
- *Special Education Certification Coursework* through the Maryland State Department of Education – Courses in special education and behavioral best practices are offered for FCPS teacher seeking special education certification at a significantly reduced rate for credit coursework.
- *Job Partnering* – Opportunity to equally share a full-time position

Despite these benefits, staff wellness is a significant concern for FCPS. Concerns centered in two areas: workload burnout and safety. A summary of comments is below.

Workload

- Special education teachers are working far beyond their day, feeling overburdened and asked to do the "impossible."
- Teachers are spending a lot of time doing paperwork when compared to time spent working with students.
- The workload is unmanageable: caseloads, intensity of students' needs, and paperwork.
- There is a struggle to manage workload across all levels- from director down to special education building staff.
- COVID has caused general burnout. Everyone is tired, and behaviors have increased. There are no substitutes, and there seems to be no end in sight.

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[51] Wisniewski & Gargiulo, 1997; Wong, Ruble, McGrew, & Yu, 2018; Wong et al., 2018; Irvin, Hume, Boyd, McBee, & Odom, 2013; Ruble & McGrew, 2013.
[52] Williams and Dikes (2015).

- Each year many special education teachers go back to teach in general education because of the stress.

Safety

- Staff are getting injured at a high rate and do not feel they have the tools to intervene safely.
- Even after an injury, staff return to work in the same situation. Many do not even take mandated breaks because the student need is so high. Teachers are getting hurt as well as SEIAs.

Staff also provided comments on the survey about safety, sharing:
- "They need to think about how they're servicing students who exhibit severe behavior challenges. People need to feel safe – staff and students. Currently, people don't feel safe – physically, emotionally, mentally. aggression, rise in significance of behaviors in students is at a critical level – leaving work bleeding, teachers having injuries.
- "It is becoming very toxic in my building."
- "We all care so much about the kids. It is very hard to work with kids that have violent behaviors, and we all try so hard."

2022-2025 Strategic Staffing Plan and DOJ Settlement Requirements

The 2022-2025 Strategic Staffing Plan provides a thorough year by year account of the actions FCPS will take to meet the staffing requirements of the DOJ Agreement. Several sections of the Agreement require specific staffing standards:

- Section III(e) of the Agreement requires FCPS to assign one Board Certified Assistant Behavior Analyst ("BCaBA") for every 20 students in self-contained classrooms.[53]
- Section III(a) requires all behavior support specialists who are assigned to self-contained classrooms to be BCaBAs. Behavior support specialists who are currently assigned to self-contained classrooms will be offered the opportunity to obtain the required certification.[54]
- Section IV(a) of the Agreement requires FCPS to hire a full-time board-certified behavioral analyst to supervise all BCaBAs.
- Section XII of the Agreement requires FCPS to develop a multi-year plan to hire more teachers with a special education certification and create incentives for current employees to obtain special education certification and BCaBA certification. The plan will incorporate more special education expertise within the district, including the hiring of multiple BCaBAs and a BCaBA Supervisor as mentioned above.

The district has elected to hire Board Certified Behavior Analysts (BCBAs) in lieu of the less rigorous BCaBA certification required by the Agreement. As of December 2022, the district has assigned one BCBA to every school that has a self-contained classroom, including but not limited to the Rock Creek School and any schools that house the Pyramid and/or Expressions program(s). The minimum required ratio is one BCBA for every 20 students in Self-Contained Classrooms. All FCPS Behavior Support Specialists in Specialized Programs were offered the opportunity to seek their BCBA certification through the Maryland Leads Program[55] as outlined in the settlement agreement and declined. Elementary and Secondary Behavior Support Specialists were replaced by hired BCBAs in the Fall of 2022. Behavior Support Specialists (BSS) will continue to support Secondary Pyramid Programs beginning in school year 2023-2024. Further, FCPS hired a Supervisor of Behavior Analysts.

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[53] "Board Certified Assistant Behavior Analyst" or "BCaBA" refers to an individual who has been certified by an accredited organization, like the BACB (Behavior Analyst Certification Board
[54] Additionally, until the start of the 2023-24 school year, and for the purposes of the agreement, an individual who is currently enrolled in a program conferring an assistant behavior analyst certificate will be considered a BCaBA.
[55] A collaboration between FCPS and Mt. Saint Mary's University which can result in receiving a Master of Science in Applied Behavior Analysis or Master add-on in order to obtain their Board Certified Behavior Analyst certification.

The Strategic Staffing Plan includes concrete targets in four areas for the 2022-2023, 2023-2024, and 2024-2025 school years.

Exhibit 57. 2022-2025 Strategic Staffing Plan

Actions

Increase the Number of BCBAs in Specialized Classes	• Hire BCBAs to meet 20:1 student to staff ratio in Expressions and Pyramid classes and at Rock Creek (*ongoing*) • Hire Supervisor of Behavior Analysts (*completed)* • Offer existing Behavior support staff opportunity to obtain BCaBA or BCBA certification (*completed)*
Grow Your Own Staffing	• Allow increased reimbursable tuition credits for general education teachers interested in becoming special education teachers and special education teachers willing to become BCBAs or BCaBAs so they can enroll in Master's Programs (*ongoing*) • Promote and encourage existing paraprofessionals to enroll in special education teaching degree programs with full-tuition reimbursement (*ongoing*)
Incentive Pay and Embedded Professional Learning	• Extend 11-month positions for all professional and paraprofessional staff working in Pyramid and Expressions Programs and embed increased professional learning (*completed*) • Add work year hours for professional learning and student problem solving (*completed*) • For 2024-25, determine incentive pay structure through contract negotiations with the Frederick County Teachers' Association, pending FCPS Board of Education approval.
Decrease Caseloads in Specialized Programs	• Propose to further reduce the teacher to student ratio of caseload responsibilities of teachers working in self-contained classrooms through further workload analysis (*ongoing*) • For 2024-25, provide caseload and staffing recommendations to the FCPS Board of Education.

While the 2022-2025 Strategic Staffing Plan does address overall special education teacher development through the "Grow Your Own Staffing" incentives, this plan is primarily focused on staffing in specialized programs. The plan does not provide an in-depth strategy for how the district will address the recruitment and retention needs of all special education staff. Competitive salary and benefits, which FCPS offers, are one part of the equation. However, focus group participants shared that this is not enough to help them address their concerns around workload burnout and safety (in non-specialized program classes).

Professional Learning

Quality teaching in all classrooms and skilled leadership in all schools will not occur by accident. It requires the design and implementation of the most powerful forms of professional learning. High quality professional learning must be sustained, intensive, and classroom-focused (not one-day or short-term workshops or conferences) to have a positive and lasting impact on classroom instruction and teacher's performance. Research reports that elementary school teachers who received

substantial professional learning —an average of 49 hours—boosted their students' achievement by about 21 percentile points.[56]

While this level of time commitment to professional learning is ideal, the complexities of scheduling, staffing shortages and turnover, and the need for training on so many topics, as noted by FCPS focus group participants, make it a near impossibility in schools today. One survey participant explained the competing priorities and lack of built-in time for professional learning in this way: "IEP/Screening meetings, procedural mandatory paperwork, staff/team collaboration, parent communication, planning, professional development, etc. MUST all be built into a WORKING schedule."

The lack of time available to attend professional learning sessions during the school day was cited as a common theme in focus groups and in the staff survey. Specifically, some said that special educators must make challenging decisions because of overlapping schedules – they need to deliver special education services as a priority and, subsequently, are not always able to attend professional learning sessions. This is also the case with SEIAs, whose workload and requirement to be with students all day limit their ability to be pulled out for training. There is a strong organizational desire to have highly trained staff; yet the concern is the time available and how much time teachers, related service providers, student support staff, and SEIAs would be required to spend away from students.

Some staff expressed their appreciation for the ability to have virtual professional learning so they did not have to leave their schools and could, if they chose, watch recorded sessions outside of school hours. FCPS is in the process of reestablishing in-person training following the COVID disruption and is evaluating how best to incorporate virtual and/or blended learning training so both attendance and engagement are high. A survey respondent wrote "trainings need to be hands-on, but a lecture and not rushed." On a positive note, one participant shared that since many more trainings and resources are offered virtually, more support staff such as SEIAs and secretaries, are requesting learning about technology features and programs to become more "tech savvy."

Another significant impact on professional learning for this school year has been the requirements set forth in the DOJ settlement. Training opportunities were reportedly dominated by the need to complete DOJ specific trainings. Further, all DOJ related trainings must be read from a script and consisted, as some teachers said, of "mostly delineating what is not allowed," therefore limiting FCPS's ability to integrate additional content or problem-solving discussions into the sessions. One teacher said: "We receive minimal professional development. This year, we had some screen casts to watch but really the only training we had was seclusion and restraint as mandated by the DOJ."

Focus group participants also shared that despite the DOJ trainings on alternate restraint and seclusion practices, they are not given the time nor the specialized training to handle the extreme and chronic behavioral crises. In their view, little to no realistic replacement strategies have been provided, and limited training on new processes for FBAs have occurred. Interfering behaviors have continued to increase with no additional staff or support. As FCPS continues to operate under the requirements of the settlement agreement and maintains its focus on meeting them, it will be equally important to provide a space for school teams to continue their learning and growth.

Professional Learning Oversight and Coordination

Focus group participants shared that, in recent years, the responsibilities for professional learning underwent an organizational shift. The former professional learning department was dissolved, and now individual departments and schools are responsible for developing and leading their content specific professional learning, in coordination with the Department of Organizational Development. One participant said this change has been positive and highlighted increased collaboration across departments as a district strength, though others said this has increased the burden placed on schools.

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[56] Reviewing the evidence on how teacher professional development affects student achievement. Issues & Answers. REL 2007- No. 033. Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance, Southwest Regional Educational Laboratory, October 2007. Findings based on nine studies that meet What Works Clearinghouse standards.

The Department of Organizational Development serves in a compliance and coordinating role regarding professional learning, in addition to creating and offering many resources for staff. The department tracks annual re-certifications, gathers feedback from teachers and support staff on their requested training needs and the mode in which they want to receive professional learning. This department serves as consultants to any training created by other departments and schools, monitors the approval of courses for submission to MSDE, and documents staff participation in the required DOJ trainings. Among several other initiatives, the department also manages a robust new teacher induction program and provides mentoring and support for new teachers through their third year of teaching. Two areas of future focus include coaching and building the capacity of teachers and providing more resources and opportunities through Support Employee Learning for the 180 different employee support roles (e.g., secretaries, SEIAs, bus attendants, etc.) in the district.

FCPS, specifically the DSE, offers professional learning options and resources to school teams. During the 2022-23 school year (to date), the following learning opportunities were offered:

- Special Education Teacher New Hire Symposium (July 2022)
- Welcome Back Professional Learning Session (Fall 2022)
- Department Chair Professional Learning (November 2022, February 2023)
- New IEP Chairperson Training (August 2022)
- Training for Returning IEP Chairpersons (August 2022)
- IEP Chairperson Ongoing Professional Learning (November 2022, January 2023)

For the past several years, the DSE has offered the *Special Education Connection: Time to Reconnect, Reignite, and Revolutionize* course, a yearlong special education professional learning opportunity that allows special education teachers, speech and language pathologists, and related service providers to develop and refine professional practices. It focuses on identifying complexities of Specially Designed Instruction (SDI) and best practices for SDI implementation based on MSDE and FCPS guidelines. It is DSE's intention to continue to offer this course annually.

Further, the DSE offers "Connections" virtually and synchronously on a weekly basis. Two sessions per month are dedicated to both elementary schools and secondary schools. These sessions are designed as open office hours for special education staff to attend and are generally centered around a specific topic, such as Extended School Year or Articulation Meetings. The sessions are recorded and shared with all special education staff weekly on Fridays in the OSE's weekly wrap up communication emails.

Identified Professional Learning Needs

Focus group participants shared many topic areas and needs, by role, that they believe should be the emphasis of future professional learning. They also provided feedback on past training and areas of need. Specifically:

New Teachers
- Induction for new teachers starts with an intensive 4-day experience in August prior to when all other teachers report back. OSE has its own new hire workshop that happens prior to the new hire training for all, which is very effective. While it can vary by school, there is great support for new teachers. Each new teacher has access to content/grade level specialists and a school-based mentor who is available throughout the first year.
- Despite support, there is still a lot of new teacher turnover and those who require even more support.
- New teachers are requesting more training on how to de-escalate behavior.
- One survey respondent shared: "The new hire trainings are fantastic and supportive for the teachers and they help teachers set realistic goals and expectations for providing services."
- An additional need for new teachers is to provide modeling planning/collaboration and how to appropriately adapt assignments in alignment with the curriculum.

School Administrators

- Administrators who serve as IEP chairs need training, and Assistant Principals should be someone familiar with special education.
- Comprehensive training for administrators on special education law and regulations has not occurred for at least the past four to five years, but principals are expected to know it.

Social Workers/Therapists

- Therapists are "on their own" to find professional learning opportunities, except at the start of the school year when some sessions are offered.
- They are offered monthly clinical meetings (90 minutes once a month). It can be difficult to attend, and when you do, it can be a challenge to focus when crisis calls occur.

Specialized Program Teachers/SEIAs

- It has been a significant benefit to have 11-month positions for specialized program staff. There are an extra 18 days/126 hours available to do training, close out the current school year and prepare for the next, etc. It's a challenge to find realistic, doable training, even with the extra time. It's often used for case management or team meetings. Further, one survey participant wrote: "Creating 11-month employee positions for specialized programs has allowed us more of the training and collaboration time needed though is still not yet adequate for all the demands placed on a specialized program."
- Teachers in the Expressions programs, Learning for Life, etc. are not getting the training to function well in the program; there used to be a "boot camp" to help people prior to taking the teaching position.
- All special education staff should be flexible 11-month employees.
- All staff in Expressions, Elementary Pyramid, and Rock Creek School received Ukeru training, including teachers and BCBAs. Staff/SEIAs in Secondary Pyramid and most Learning for Life programs did not receive Ukeru training.

Teachers/Counselors

- Professional learning for teachers is a lot of "sit and get."
- Some teachers seem not educated on how to accommodate certain needs.
- It is very challenging to develop content that allows special educators to not only focus on compliance but learn about content, delivery, and formative assessment.
- FCPS is on the path to using evidence-based instructional practices across the board, but it is a challenge when new teachers are graduating without this foundation.
- Teachers need training on how to implement an IEP they may have not written.
- FCPS needs to provide adequate training on reading interventions for students reading well below grade level and those with dyslexia.
- Even for students in general education, staff does not have the necessary expertise to manage behaviors and communication needs and curriculum knowledge to best meet student needs.
- Special educators need training on technology and implementing in the classroom for the students benefit.

Several previous training sessions were called out for being effective and helpful, including:

- Orton- Gillingham (OG), Language Fundations, and Sounds of Syllables – some teachers said they had "access to more training in this county than other jobs."
    - A survey participant shared appreciation for having access to this training: "I am a regular ed teacher who teaches reading intervention and OG+. The district allowed us to get trained and it has been wonderful. My principal asked me to go and I am so lucky. More regular ed teachers should get trained."
- A case management course offered two years ago was helpful.
- The Science of Reading was implemented in K-2 and training was provided to special educators to implement it and to support Tier 3 interventions.

SEIAs

- Many focus group participants and survey respondents shared that SEIAs do not receive sufficient training and are not adequately prepared to do their jobs.
- Some expressed the desire for the same level of training for paras (as teachers) to work with students who are using communication devices.
- Others would like disability awareness training and further training on behavior de-escalation techniques.
- SEIAs often come into the role without a strong knowledge base and the responsibility of providing on the job training for them falls to the special education chair in the building.

Transportation

- The Department of Transportation's "wish list" includes:
  - More specialized training for supporting students with disabilities on a moving vehicle and effective interventions to use without being hands-on with students
  - Additional training to understand medical needs for the entire student population (i.e., students without an IEP can still have a peanut allergy) and specific disability characteristics.

Staff was surveyed as to whether they felt professional learning offerings they attended enabled them to better support the teaching and learning of students with IEPs. Of all groups surveyed, only a little over half, 54 percent, agreed that professional learning offerings they attended supported them in their work with students with disabilities. This indicates that FCPS should critically examine the offerings they have provided and determine what staff need to feel successful in supporting students with IEPs for professional learning offerings.

> ➢ 54% of special education teachers
> ➢ 55% of general education teachers
> ➢ 55% of related service providers
> ➢ 47% of student support services
> ➢ 57% of building administrators
>
> FCPS staff agree that professional development offerings enabled them to better support the teaching/learning of students with IEPs.
>
> *Staff Survey*

To support FCPS in identifying the professional learning needs of their staff, they were asked to respond to the prompt: "I would like to attend professional development on the following topics" on the survey. The following chart includes the percentage of staff who answered affirmatively for the listed topics. For each role, the top five requests are noted in bold.

Exhibit 58. Staff Survey: Top Five Professional Development Topic Requests by Role

Topics	Special Education Teacher	General Education Teacher[57]	Specials/ Elective Teacher	Related Service Provider[58]	Student Support Services[59]	Special Education Instructional Assistant	School Administrator
Assistive Technology	51.5%	33.6%	48.5%	**77.3%**	51.4%	**61.9%**	33.3%
Behavior Intervention Plans	**69.9%**	30.6%	30.3%	26.8%	**73.7%**	58.8%	45.5%
Collaborating with paraeducators	51.1%	40.1%	37.5%	62.5%	51.4%	**64.3%**	**52.4%**
Differentiated Instruction	54.1%	**57.2%**	**59.4%**	50.0%	35.1%	52.6%	30.0%

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[57] Includes Advanced Placement, Honors, Gifted and Talented, etc.
[58] Includes OT, PT, Speech, etc.
[59] Includes Psychologist, Nurse, Counselor, Social Worker, Behavior Interventionist

Functional Behavior Assessments	**68.1%**	26.8%	25.0%	17.9%	**73.7%**	53.4%	33.3%
Inclusion in general education	50.0%	**47.4%**	**54.8%**	**73.8%**	52.6%	**61.2%**	42.9%
Math Interventions	**68.1%**	40.6%	0.0%	0.0%	11.1%	40.2%	**52.4%**
Positive Behavior Supports	**67.6%**	**64.5%**	**66.7%**	**80.0%**	**87.2%**	**81.9%**	**52.4%**
RTI/MTSS	60.3%	**50.8%**	**51.6%**	**80.0%**	**89.7%**	48.9%	**52.4%**
Special education regulations	44.9%	25.5%	12.5%	61.0%	45.9%	45.9%	**50.0%**
Specific Disability Information	**62.9%**	**51.9%**	**57.6%**	**73.9%**	**73.7%**	**84.2%**	47.6%

All eight respondent groups ranked Positive Behavior Supports as one of their top five topics, while six of the groups ranked RTI/MTSS and Specific Disability Information as top training priorities. Participants were also asked to rate their interest in these several other topics; however, none were ranked in the top five for any respondent group, and, therefore, not included in the chart above.[60]

Summary and Implications

FCPS has not been immune to the challenges districts nationwide are facing specific to finding and retaining special education teachers. Staff noted recruitment and retention challenges within special education and highlighted the lack of diversity within staffing, high caseloads, challenging student behaviors, and limited time for professional learning as some of the biggest obstacles they were currently facing. Many staff felt they were reaching a "burnout" point and were concerned about staff safety when handling significant student behaviors. It will be important to consider staff wellness in order to prevent teacher "burn-out" and work with building leaders in this effort.

Staff appreciated the opportunities for blended professional learning and the recordings of trainings the district provided but struggled with the lack of options for professional learning as it related to each person's current needs for growth and development. A large portion of recent trainings were focused on restraint and seclusion due to the DOJ settlement. Yet these trainings lacked alternative strategies for supporting student behavior. Staff felt additional training focused on how to support students in crisis, Positive Behavioral Interventions and Supports (PBIS), RtI/MTSS, and Disability Specific training would be beneficial.

DSE offers a menu of training courses for staff and a year-long professional learning opportunity for special education staff that focuses on special education teams working together to refine best practices. Additional trainings noted as effective and helpful included Orton-Gillingham, Language Fundations, and Sounds of Syllables, a course on case management, and Science of Reading for K-2. These options, along with those identified by staff in this chapter, provide an excellent starting point for professional learning opportunities in FCPS.

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[60] Topics included: 1) Data to inform instruction; 2) Independent living skills; 3) Reading interventions; 4) Supporting students taking the alternate assessment; 5) Transition Planning; and 6) UDL.

VIII. SYSTEMS AND STRUCTURES

Strengths
• **Policy and Guidance Documents.** FCPS has developed a wide range of documents created for school staff to assist with implementing and monitoring special education services. • **Compliance Monitoring Plan.** The district has an organized and comprehensive approach to ensuring special education compliance in schools using a variety of tools. • **Staffing Ratios.** Special education teacher and SEIA to student ratios are low compared to other districts nationally.

Opportunities for Improvement
• **Special Education Teacher Duties.** There is a need to clarify their roles and responsibilities to ensure they can deliver required IEP services. • **Paperwork and Technology.** District systems, including the Online IEP system, need to be evaluated and improved in order to reduce time spent on redundant paperwork.

This section provides information about FCPS's systems and structures to support the teaching and learning of students with IEPs. It addresses the following areas: Policies, Procedures, and Monitoring; School-Based Position Allocations; and Technology and Paperwork.

Policies, Procedures, and Monitoring

FCPS has policy, procedures and monitoring elements in place to oversee the implementation of special education services. From a district perspective, two Board of Education directives ensure continuity with delivering special education services.

- **Special Education**: This policy revised in 2020, commits the Board of Education to provide a Free and Appropriate Public Education with services delivered in the Least Restrictive Environment that meets individual needs, while at the same time provides for individual differences.
- **Special Education Individualized Education Program (IEP) Regulation**: This regulation revised in 2019 is intended to outline the IEP process and the role of parents as equal participants.

Exhibit 59. FCPS Monitoring Approach

As with any large school system, the clarity of processes and consistency with which they are implemented can vary. Communication can often feel disjointed, unclear, and rapidly changing when situations are fluid in schools. To that end, FCPS has made a concerted effort to improve their guidance to personnel through a number of internal monitoring processes at the school and district levels. The exhibit below demonstrates FCPS' commitment to updating procedure for reporting and monitoring purposes.

The District has an organized and comprehensive approach to compliance monitoring, as shown in the graphic to the right.

As is stated in the Staffing Plan:

> In an effort to implement ongoing progress monitoring, FCPS uses the Monitoring for Continuous Improvement and Results (MCIR) guide to conduct annual audits in which individual student files are randomly selected and reviewed for specific compliance requirements. School-based staff are directed to use an Internal Monitoring and Evaluation Feedback (M&E) form to self-monitor the implementation of the IEP process for all identified students.

The exhibit below explains each of these elements and how the DSE ensures policies and procedures are enacted at the school level and the tools used for the monitoring.

Exhibit 60. FCPS Reporting and Monitoring Chart

Data Reviewed	Action	August 2022	January 2023
Maryland Online IEP Internal Monitoring Form	Professional Learning/Training in Internal Monitoring. School team guidance to audit Online IEP Documents for each student using the FCPS MDOIEP Internal Monitoring Tool at least once a year.	Special Education Updates for 2022 - 2023 Special Education and Related Service Providers Beginning of Year Checklist	Department of Special Education Connections - Focused review on the Maryland Online IEP Internal Monitoring Form during January 2023. OSE Connections January 4, 2023

	To date, 229 Maryland Online IEP Internal Monitoring Forms have been submitted by school-based staff.		Completed Maryland Online IEP Internal Monitoring Forms to date: • Elementary- 80 • Middle- 51 • High- 93 • Other- 5
IEP Desk Review: Compliance, Assessment, and Curriculum	21-22 IEP Desk Review: Compliance, Assessment, and Curriculum	Internal Monitoring Data '21-'22 • Elementary- 14 • Middle- 4 • High- 3	
	22-23 IEP Desk Review: Compliance, Assessment, and Curriculum		Internal Monitoring Data '22-'23 • Elementary- 6 • Middle- 0 • High- 1
Special Education SQL Reporting Services	School-Based Reports	Reports • Least Restrictive Environment (LRE) • Missing Alternate Assessment Consent Assessment • Missing IEP Goal Progress • Safe Feeding Protocol	Focus on refining existing reports and expanding repository to include: • ESY Referral Log • Disproportionality Monitoring • Joint Referral for assessment • Restraint/Exclusion IEP monitoring
	Central Office Reports	Reports Student IEP Compliance (annuals and re-evaluations) State Performance Plan Indicator 11 -Initial Eligibility Special Education Related Services	Focus on refining existing reports and expanding repository to include: • ESY Referral Log • Disproportionality Monitoring • Joint Referral for assessment • Restraint/Exclusion IEP monitoring

Standard operating procedures provide schools and personnel with the procedural framework necessary to develop high quality delivery of special education services across all aspects of special education programming and to consistently operate across the district. When asked about standard operating procedures participants shared policies and procedures are updated and revised but not consistently trained on or communicated. Overall, special educators stated policies and procedures are not formally written down especially for the development of IEPs. This leads to a lack of consistency throughout schools and teachers "go off script." Specifically, participants indicated they have not received written guidance on how goals, objectives, and PLAAFPs should be formatted and what content should be included. This lack of consistency trickles down into the delivery of services from building to building and can impact families when moving from one area of the county to another.

The underlying issues related to the lack of clear policy and procedural guidance are most often related to communication. This has been echoed by participants for a variety of reasons to include a lack of consistent guidance from central office, changes being made but no clear direction was provided causing confusion and frustration. Depending on who you talk with in central office, depends on the answer you receive. As an example, different roles are receiving different processes and worksheets references. One staff member voiced that messaging changes and these changes elicit confusion. Generally, staff voiced the need for operations within FCPS to be more aligned and processes and procedures to be simplified in a manner where staff and school personnel can easily

locate and implement all the necessary documents, forms, worksheets, and process guidance to facilitate consistency within the district.

Special Education Staffing Formulas

Guidance and Best Practices for Staffing

Creating a special education staffing formula is a complex and nuanced task, and it is not a "one-time" undertaking. Staffing could change continuously throughout the school year, as students move between schools or in/out of the district and new students are found eligible for services. A formula is also impacted by districts' varying implementation of inclusive practices and the degree to which they employ more "push-in" type support versus more "pull out". According to the Inclusive Schools Network:

> The task of determining staffing needs at a school and across a district is challenging because the type and level of support required by each student is determined on an individual basis through the IEP team, yet these student-by-student decisions are significantly impacted by numerous contextual variables. These variables include, but are not limited to, philosophy of administrators and teachers, school leadership factors, classroom practices that support diverse learners, the degree of collaboration and joint ownership for all learners across the entire faculty, and the ability of the leaders to organize the delivery of services through innovative scheduling and staffing practices.[61]

As such, special education staffing formulas can differ considerably between states and across districts within the same state. According to a March 2020 study, 20 states have specific policies about caseloads. Each varied widely and used different combinations of factors such as disability category, age range, average caseload, maximum caseload, service provider, amount of time the student is served in special education, type of program, formulas, or some combination of two or more characteristics to determine caseload.[62]

Several states and professional organizations have created resource guides to assist districts with creating staffing formulas. These resources are designed to aid in the analysis of instructional staff (special education teachers and paraprofessionals) needed as a minimum starting point for providing a full continuum of services and meeting the needs identified in students' IEPs.

Before making final staffing decisions, additional considerations to continually consider include:

- severity of student needs and types of support services needed;
- implementation of a full continuum of service delivery models; and
- compliance with special education legal requirements.[63]

Workload Versus Caseload

Rather than focus solely on caseloads, several guides advocate for the use of a workload analysis, which factors in tasks such as IEP development and progress monitoring in addition to teaching time per special educator.[64] A caseload is not the same as a workload.

- A caseload is a head count, or the number of students with an IEP for which a special educator is responsible.

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[61] https://inclusiveschools.org/category/resources/staffing-models/
[62] Hogue, L. B., & Taylor, S. S. (2020). A review of special education caseload policies state by state: What impact do they have? Journal of Special Education Leadership, 33(1), 1-11.
[63] https://www.esc20.net/apps/pages/special-education-resources-staffing-considerations
[64] https://www.esc20.net/apps/pages/special-education-resources-staffing-considerations;
https://www.mnase.org/uploads/4/7/7/9/47793163/bullard_workload_manual.pdf

- A workload includes all the responsibilities required of special educators and is based on the severity of students' needs.[65]

In Illinois, for example, the State Special Education Rule was changed in 2007 from a caseload to a workload staffing model. Illinois districts are required to specify limits on the workload of its special educators so all services required under students' IEPs, as well as all needed ancillary and support services, can be provided at the requisite level of intensity.[66] Each plan must be based on an analysis of the activities for which the entity's special educators are responsible: 1) Individualized instruction, 2) Consultative services and other collaborations among staff members, 3) Attendance at IEP meetings and other staff conferences and, 4) Paperwork and reporting. The ESC 20 in Texas has created worksheets to help districts analyze workloads for special education teachers and related service providers.

Staffing Ratios

Comparative student-to-personnel ratios are useful for school districts to benchmark their staffing levels. The data discussed below were collected by PCG team members through their participation in reviews conducted by PCG, the Council of the Great City Schools, and the Urban Special Education Collaborative.

The ratios reported below are provided for special educators, paraprofessionals, speech/ language pathologists, and psychologists. Ratio comparisons for nurses, occupational therapists (OTs), and physical therapists (PTs) are not included, as those staff are employed by the Frederick County Health Department. The figures do not reflect actual caseload ratios for each of these personnel areas based on student IEPs. Rather, they are based on full-time equivalent (FTE) staff members. The total FTE count for each area is compared to the total number of students with IEPs in the district. FCPS ratios are compared to 89 other school districts on which we have data. However, there are some districts who did not report data in each area.

The data do not give precise comparisons due to a variety of factors that impact how districts collect and report data. For example, some districts include contractual personnel and others exclude them, and data are sometimes affected by varying placement types used by school districts. The data may count all students with IEPs, including those placed in charters, agencies, and nonpublic schools, while other districts do not count these. The outcomes of the staffing ratio analysis should be used to investigate, along with other information, the extent to which personnel in areas outside the norm are being used effectively, how they are meeting the needs of students, and whether adjustments are warranted.

Special Educators and Special Education Instructional Assistants (SEIAs)

The exhibit below shows the district's students with IEPs-to-personnel ratios for the areas of special educators and SEIAs.

- **Special Educators.** With 428 full-time-equivalent (FTE) special education teachers, FCPS has an average of 12.2 students with IEPs for every special educator. FCPS's 12.2 ratio is lower than the overall 14.1 students to teacher average, ranking FCPS as 39th among 91 other reporting districts.
- **SEIAs.** With 711 FTE SEIA positions, FCPS has an average of 7.3 students with IEPs for every SEIA. FCPS's ratio is lower than the overall 15.1 students to paraprofessional average, ranking FCPS as 11th among 91 other reporting districts.

Exhibit 61. Average Number Students for Each Special Educator and for Special Education Instructional Assistant

	Special Educators	SEIAs
Number of FCPS Staff FTE	428	711

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[65] https://www.isbe.net/Documents/work_load_plans.pdf
[66] https://www.isbe.net/Documents/work_load_plans.pdf

FCPS Students w/IEP-to-Staff Ratios	12.2:1	7.3:1
All District Average Ratios	14.1:1	15.1:1
Range of All District Ratios	4–36:1	3–56:1
FCPS Ranking Among Districts[67]	39th of 91 districts	11th of 91 districts

Related Services Personnel

The exhibit below shows the district's students with IEPs-to-personnel ratios for speech/language pathologists and psychologists.

- **Speech/Language Pathologist (SLP).** There are 99 FTE speech/language pathologists. There are 52.7 students with IEPs for each SLP, which is lower than the all-district average of 117.2 per SLP. FCPS ranks 10th of 91 reporting districts.
- **Psychologists.** FCPS has 54 psychologists. There are 96.6 students with IEPs for each psychologist, which is a lower ratio than the all-district average of 175.8 per psychologist. FCPS ranks 13th of 88 reporting districts.

Exhibit 62. Average Number Students for Related Service Personnel Area: Speech/Language Pathologists and Psychologists.

	SLPs	Psychologists
Number of FCPS Staff FTE	99	54
FCPS Students w/IEP-to-Staff Ratios	52.7:1	96.6:1
All District Average Ratios	117.2:1	175.8:1
Range of All District Ratios	33-710:1	24-806:1
FCPS Ranking Among Districts[68]	10th of 91 districts	13th of 88 districts

Staffing for Inclusive Practices

Other guides, especially those emphasizing a commitment to inclusive practices, also recommend using student needs and scheduling as the primary driver for determining allocations. The primary driver for this approach is a district's philosophy about inclusion. In other words, they adopt guiding principles for determining staffing in inclusive schools, such as:

1. Staffing and scheduling decisions are based solely on the needs of individual students through an objective, student-centered process.
2. Staffing decisions are not made based on labels, places, or available services.
3. Schedules are flexible as students move in and out of the school and as individual students' needs change over time.

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[67] Ranking begins with districts having a low average number of students to one staff person.
[68] id.

4. A single staffing model, such as collaborative teaching (co-teaching) is not synonymous with inclusion. Several different staffing models will be needed to personalize support decisions for each individual student.

5. Special education teachers recognize they may serve multiple roles throughout the day based on student needs.[69]
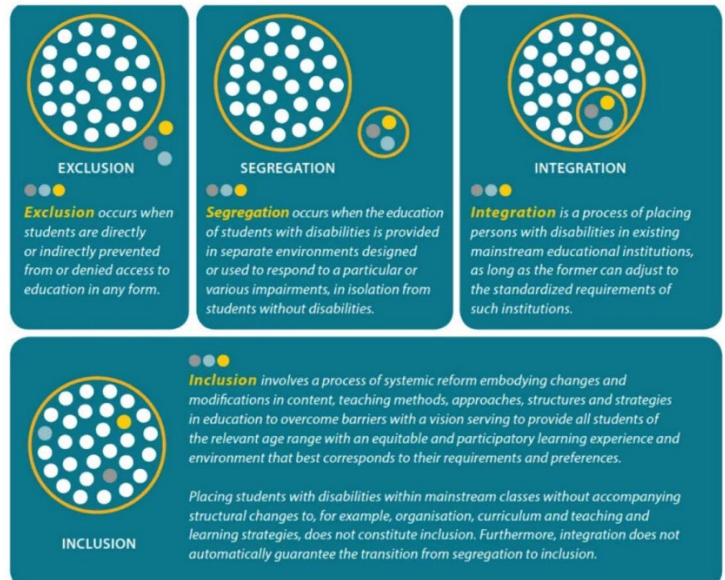
In Virginia, the Department of Education has published a K-12 Inclusive Practices Guide to help districts adopt inclusive practices and align their staffing resources accordingly.[70] Washington State's Inclusionary Practices Handbook, contained a visual as to how inclusion can occur. Depending on the approach districts take to inclusion, staffing (for example relying on segregated/pull-out approaches versus inclusion/co-teaching) will need to follow suit.

Maryland Guidance

While the State of Maryland does not provide extensive caseload guidance, regulations do detail expectations around full-day special education staffing requirements:

E. Student-to-Teacher Ratio[71]

(1) A school shall provide sufficient teachers and other personnel to implement each student's IEP.

(2) Full-Day Special Education.

(a) The average class size may not exceed six students with disabilities per full-time certified teacher.

(b) If an aide is present in each class, the average class size may not exceed nine students with disabilities per full-time certified teacher.

(c) The average class size for students with significant orthopedic impairments may not exceed seven students with disabilities per full-time certified teacher when an aide is present in each class.

Staffing Plan

Local school systems are required by the Code of Maryland Regulations (COMAR) 13A.05.02.13 D to develop a yearly Special Education Staffing Plan to ensure that sufficient staff members are available to meet the programming needs of students. The plan must be completed on or before July 1. In addition, the plan is required to include the following:

- evidence of public input;
- evidence of maintenance of effort within the meaning of 34 CFR §300.231, Maintenance of Effort, and COMAR 13A.02.05, Maintenance of Effort;
- staffing patterns of service providers for special education and related services;

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[69] 2018, Stetson & Associates, Inc. (2018) Models of Support for Inclusive Schools: A Resource Guide for Practitioners.
[70] https://www.doe.virginia.gov/programs-services/special-education/iep-instruction/inclusive-practices
[71] https://casetext.com/regulation/maryland-administrative-code/title-13a-state-board-of-education/subtitle-09-nonpublic-schools/chapter-13a0910-educational-programs-in-nonpublic-schools-and-child-care-and-treatment-facilities/section-13a091017-type-i-educational-program-requirements-for-a-special-education-program#:~:text=(a)%20The%20average%20class%20size,per%20full%2Dtime%20certified%20teacher.

- consideration of time requirements beyond direct services
- the number and type of service providers needed to provide FAPE to each student with a disability in the least restrictive environment (LRE);
- local accountability and monitoring;
- strategies to resolve concerns regarding staffing plans;
- evaluation of the local staffing plan for effectiveness;
- steps to secure public input in the development of the staffing plan; and
- information on how the public agency will use the staffing plan to monitor the assignment of staff members to ensure that personnel and other resources are available to provide FAPE to each student with a disability in the LRE.

FCPS's Staffing Plan provides information about the caseload and staffing model the district uses, along with projected allocations by role. The SECAC reviews the Staffing Plan annually. The plan is posted on the FCPS website and is monitored on an ongoing basis by the Supervisors of Special Education, with a request for feedback and input to be considered.

School-Based Staffing Formulas

The district uses a caseload-based staffing model for allocation of special education teachers, speech-language pathologists, and SEIAs.

The special education teacher staffing model used as a guideline for allocating staff is as follows.

Exhibit 63. FCPS Special Education Staffing by Level and Position

Programs		Average Caseload Size
Elementary	Per 1 Teacher	10-15 students
Middle		15-20 students
High		15-20 students

The Speech Language Pathologist (SLP) staffing model used as a guideline for allocating staff is as follows:

Programs		Average Caseload Size
Elementary	Per 1 SLP	40-43 students
Middle		45-48 students
High		45-48 students

The SEIA staffing model used as a guideline for allocating staff is as follows:

Elementary		Secondary	
Caseload	# of SEIAs	Caseload	# of SEIAs
0 - 15	1.0	0 - 40	2.0
16 - 30	3.0	41 – 60	3.0
31 - 45	5.0	61 – 80	4.0
46 - 60	7.0	81 – 100	5.0
61 - 75	9.0	101 – 120	6.0
-	-	121 – 140	7.0
-	-	141 – 160	8.0

The DSE also runs a complexity model on top of caseload projections. The complexity value equals the Percent of Autism and Emotional Disability on Caseload (PAEC) + Percent of Autism and Emotional Disability in School Population (PAES) + Number of students Enrolled in Structured Literacy Intervention. This means schools with higher complexity values could be allotted an

additional 0.5 or 1.0 FTE to accommodate the complexity of student needs. It is not clear in the allocation data which schools may have received additional FTEs based on having a higher complexity value.

Further, students with disabilities being served along the least restrictive environment continuum could require more, or less, teaching support contingent upon several factors, such as grade distribution of students with IEPs and the way that services are scheduled. Additionally, special educators are responsible for the oversight of SEIAs providing instruction and other support to students with disabilities. The time commitment for this responsibility varies widely across the types of classrooms and individual students served as well as SEIA's familiarity with their responsibilities.

FCPS's current staffing formula does not explicitly account for these variations, especially for Resource/Inclusion where broad differences in students' strengths and abilities exist or where students are spread across general education classrooms. In many cases at the elementary school level, one Resource/Inclusion teacher could be serving as many as 15 students across several grade levels (e.g., one teacher could have grades K, 3, and 4 while another serves 1, 2, and 5 at the elementary level, and one teacher could serve across all four grade levels in high school, across a variety of subjects).

Below is a snapshot of staffing and the number of students by LRE category in ten randomly selected schools: 5 elementary, 3 middle, and 2 high. Students in specialized programs and those with a primary disability of Speech-Language Impairment were not included with the students below.

Exhibit 64. Staffing and Number of Students with IEPs in Select Schools

School	Elementary					Middle			High	
	Ballenger Creek	Deer Crossing	Myersville	Sugarloaf	Waverly	Oakdale	Urbana	Gov. Thomas Jefferson	Linganore	Tuscarora
# of Special Education Teachers	3	3	3	3	4	5	4	11	9	11
# of SEIAs	5	5	3	5	5	4	4	9	8	8
# of Students	31	26	29	34	41	79	100	178	152	128
40-79% in gen ed	4	1	0	3	0	1	10	1	25	1
80% or more in gen ed	27	26	29	31	41	78	90	177	127	127
Average Teacher Caseload	10.3	8.7	9.7	11.3	10.3	15.8	25.0	16.2	16.9	11.6

For these sample schools, special education teacher allocations fell within the stated caseload allocation range. With most students receiving special education services in the general education environment 80% or more of their day, special educators likely do not have the capacity or time in their schedules to effectively meet the needs of students across so many classrooms, nor do they have the time to collaboratively plan with general education teachers. This situation can create a default "special educator as assistant" scenario, rather than special educators actively co-teaching or leading co-planned parallel lessons or stations.

Allocations are determined annually by the DSE and shared with principals based on student projections and the caseload guides. Principals receive the allocations, sign off on them, and then hire to fill vacant positions as needed. They then are charged with ensuring oversight of their school's special education team. The special education staff is allocated within each master schedule to provide a continuum of services ranging from general education, consultation, co-teaching, push-in, and pull-out. Special educators that are trained in structured literacy and the science of reading, by the district, are the only staff who can provide the intervention. This means in some buildings special educators are responsible for leading intervention groups for students without IEPs as well. While their skills sets and training equip them to reach all students (regardless of disability status), this commitment adds to the special educators' workload and allows less time for them to provide IEP-mandated services and ensure compliance with special education requirements, such as assessments, progress monitoring, IEP goal development, etc. This is also the case with SEIAs, who are often pulled from special education responsibilities and direct support for students to cover school-wide duties. Based on caseload numbers alone, FCPS seems to staff special education at a higher rate than other districts; however, by redirecting special education staff to support other school

functions the actual resources available in the building to support requirements related to supporting students with disabilities are artificially inflated.

Stakeholder Feedback

Narrative feedback about the staffing formula paints a different picture than the quantitative analysis provided above. Caseloads may appear low but focus group and interview participants shared feedback that workloads are overwhelming and student needs high. The following comments summarize participants' feedback on the staffing formula.

- The staff model needs to change. Staffing is based on the number of students with an IEP in each building, not service minutes. Even caseloads look different – some staff have more consult minutes while others have more direct service minutes. It is an antiquated model.
- Requests to increase staffing mid-year can be submitted but usually do not result in increases.
- SEIA staffing is not determined by level of need. For example, one student may require toileting support several times a day, which occupies a great deal of time for 1 of 3 SEIAs assigned to a building.
- Schools are trying to do co-teaching but the current staffing model does not allow for it. Caseload and inclusive practices models do not align. One potential solution is to have a hybrid model, with a case management ratio that prioritizes places to co-teach. This could be different at each level. This hybrid model must have a clear vision.
- Some schools have the same caseloads, but the student needs are very different between them. Staffing should be different based on student needs.
- Staffing allocations are calculated based on numbers that are out of date by the time the school year starts. There should be staffing adjustments made based on student numbers in September.
- Historically a caseload model with a range has been used to provide enough of a buffer for fluctuations in student numbers over the course of the year.
- There is a belief that "more hands are better than fewer" – but in reality, "more trained hands are more effective."
- We currently have double the number of SEIAs as special education teachers, but the district should give students more instruction from a certified teacher, as opposed to more SEIA support.
- SEIAs are valuable but do not solve the problem that educators, administrators, and families think they do; in the general ed setting, SEIAs turn into more of a "band-aid."
- Instead of adding more teachers, the philosophy has been that we should continue to hire SEIAs. The district recognizes the overdependence on SEIA support.

Technology and Paperwork

A 2003 Study of Personnel Needs in Special Education (SPeNSE) identified the burden of paperwork as a significant factor in special education teachers' job manageability and one of the main causes for dissatisfaction of special education teachers. Findings indicated that teachers spent an average of 5 hours a week on paperwork. Additional conclusions identified that teachers spend less time writing IEPs if they selected from a pre-developed list of annual goals and update only portions of the IEP document that require change. Of the teachers interviewed in the study, 88 percent indicated that administrative duties and paperwork interfered with their job of teaching to a moderate or great extent.[72]

Though this study was completed 20 years ago, the notion that special education paperwork is overwhelming is perennial. Focus group participants and survey respondents provided detailed information about the challenges of keeping up with the required documentation. Despite receiving an

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[72]

https://www.researchgate.net/publication/234664094_SPeNSE_Study_of_Personnel_Needs_in_Special_Education_Final_Report_of_the_Paperwork_Substudy

additional 21 hours this year to support completing the paperwork, FCPS special education teachers still think this is not enough time.

Survey respondents shared:

- *IEP paperwork is a beast. One IEP takes more than 30/40 minutes to be done well. That is all our planning time is. How do we then lesson plan for 9/10 groups a day? This means we do something at home all the time. This is not fair or good for a teacher's mental health.*
- *Most special education teachers only provide SDI 4 days per week due to paperwork demands and preparation for IEP meetings. SDI would increase by 25% if there was a dedicated staff person to handle all paperwork aspects.*
- *There is too much "CYA" with paperwork and logging and uploading to adequately support students. There is only so much time in the day and now they're adding even more with these portfolios.*
- *The amount and type of paperwork is mind dumbing, redundant, and ever-growing.*
- *Our case managers do their best to service the students. This is our focus; however, the paperwork is taking over as the main focus and the students are secondary. It should be the other way around."*

Focus group participants also described the challenges associated with completing paperwork through the online IEP (OIEP) system that FCPS uses, specifically:

- The online IEP program needs to have updates done to avoid case managers wasting time retyping information over and over.
- Staff at schools are not trained or always alerted to changes in the online IEP system or in forms to be used. There does not seem to be any particular standards for paperwork-everyone does it differently and expectations change without anyone really letting those doing the paperwork know.
- Putting things in OIEP and doing the Medicaid logs takes hours, and it is often copying and pasting. The paperwork is very repetitive.
- There are times when the teacher must work through so many steps in a process, even when there are no associated compliance requirements.

They also shared a few recommendations that could improve the IEP system:

- Make OIEP populate dates (i.e., currently when there is a change in the IEP meeting date they must go in and change the dates everywhere).
- Reduce the duplication in where/how information is entered (i.e., repetition of writing the same information leads to some missed steps).
- Improve the print outs (i.e., intervention data will print blank boxes when nothing is entered, which makes it look to parents like something was neglected
- Create technology tools that help save time and streamline IEP development, such as goal banks, templates, checklists, etc.
- Develop a way for IEP information to be shared more easily with parents.

Summary and Implications

With regards to staffing ratios, FCPS caseloads for all staff examined, including special education teachers, SEIAs, speech and language pathologists, and school psychologists, show they are lower than average compared to other districts nationally. This indicates that caseload sizes in FCPS are appropriate both compared to other districts and within the staffing plan FCPS created. FCPS also uses a complexity model for caseload projections to support schools that have students with higher needs; however, it was unclear which schools received additional FTE support based on this formula.

While caseloads are lower than average when compared to other districts, if staff feel overwhelmed, it is important to look closely at their roles and responsibilities to see if there are additional responsibilities they are given impacting their ability to work with students. This is why comparing workloads versus caseloads is a valuable analysis.

With special education teachers in FCPS providing reading interventions to general education students that are not on their caseload and the practice of pulling SEIAs for other school duties, the reality of these ratios could be different than what is allocated. There were also some concerns that there was more focus on specialized programs and staffing at the expense of supporting other special education teachers with SEIAs.

An additional challenge that was discussed by staff included the burden of paperwork and the OIEP system that seemed to be time-consuming and cumbersome. Staff felt the effort it took to complete IEPs in the system, in addition to all the other paperwork requirements, took up a significant amount of time that could be better utilized in supporting students. This is an area that FCPS should dive deeper into as there could be a variety of ways to alleviate this additional burden on staff if paperwork is contributing to staff burnout and time consuming to complete.

IX. RECOMMENDATIONS

PCG was contracted to provide an objective view of the special education program in FCPS and has identified in this report both strengths and areas of improvement that require focus in the coming years. FCPS leadership, the Board of Education, and staff alike have demonstrated a commitment to investing in student-centered initiatives and systems. PCG saw ample evidence that FCPS has a solid foundation on which to build. FCPS has many notable strengths, including its commitment to improving outcomes for students with disabilities and its willingness to undertake this review and act on the recommendations as part of a continuous improvement cycle.

The recommendations listed below serve as a roadmap to address areas of improvement, leading to the future growth of the special education program. Each is interrelated and will require a significant investment on the part of FCPS. Implementation of these recommendations will set the foundation for all other action steps that emerge from this report. The action steps listed under each recommendation below are organized in a manner that provides a comprehensive view of the activities required to initiate change. Although components of the action steps can be implemented within a shorter timeframe, full-scale implementation of the recommendations may take three-to-five years.

Recommendation areas are organized into the following categories.

Exhibit 65. Recommendations by Category

Domain Category	Recommendation Area
Learning Environment and Specialized Services	1. Multi-Tiered System of Supports 2. Identification Practices and Disproportionality Monitoring 3. Inclusive Practices 4. Specialized Programs 5. Behavior Support 6. IEP Development
Leadership and Organization	7. DSE Organization 8. Strategic Vision
Family and Community Partnerships	9. Report Recommendations 10. Advocacy Centers and Training 11. Website
Human Capital	12. Staff Wellbeing 13. Professional Learning
Systems and Structures	14. Written Procedures 15. Online IEP System 16. Staffing Allocations

Through this review, PCG assessed FCPS against the elements listed with each Research to Practice section below and provides recommendations in areas that require additional improvement. The resources for each section serve as the foundation for these elements and can be used by FCPS to enact the recommendations. Some resources provide a foundational understanding of best practices while others serve as high-quality examples of guidance documents. These lists are supplemental to the references listed throughout the report.

Learning Environment and Specialized Services

Goal

To deliver instruction and interventions within an inclusionary framework and with Individualized Education Program (IEP) fidelity, leading to increased access and progress in grade-level learning standards and reducing disproportionality.

Research to Practice

High-quality instruction in the general education environment is the first and most critical element of ensuring that students with disabilities achieve at high levels, but many students with disabilities also need high-quality and highly individualized special education and related services.

Tenets of an effective system to support the academic, behavioral, and functional needs of students with disabilities include the following elements.

Access to the General Curriculum

➢ The district has a robust Multi-Tiered System of Supports (MTSS) framework that is consistently implemented and appropriately supportive of struggling learners.
➢ Teachers utilize collaborative planning and instruction that includes application of Universal Design for Learning (UDL) principles and formative assessment.
➢ Staff have access to and training on a wide range of instructional technologies and software resources for use across a variety of settings (in person, hybrid, virtual).
➢ All students have access to rigorous curriculum, with a full continuum of services and programs, in the general education setting.
➢ Teachers use student data to select and implement evidence-based teaching and learning strategies.
➢ Schools provide high-quality inclusive programs and activities based on high-leverage practices.

Positive Behavior Supports and Social-Emotional Learning

➢ Positive behavioral supports are a part of the school culture.
➢ Students learn tools and replacement behaviors for how to engage in the classroom and school productively and positively.
➢ Students feel safe in the learning environment.
➢ Teachers use appropriate language (verbal and nonverbal) and apply trauma-informed practices and appropriate de-escalation strategies.
➢ Expectations, routines, and procedures are culturally responsive, age appropriate, and posted and modeled in the classroom and school.
➢ Schools implement, and students are taught, restorative practices as alternatives to punitive disciplinary practices (e.g., suspension and expulsion).

Individualized Education Program (IEP) Development

➢ IEPs include goals designed to increase the amount of time students spend in general education settings.
➢ IEP teams use formative assessment to collect baseline data and monitor goal progress.
➢ Staff complete IEP documents to meet compliance requirements.
➢ Services are consistently delivered and documented according to required timelines.
➢ All IEP team members participate actively to make informed decisions.
➢ Students are active participants in their IEPs.

Individualized Supports

➢ Teachers design, provide, and assess the effectiveness of specially designed instruction and adjust delivery as needed.

➢ The Assistive Technology (AT) evaluation team matches the appropriate AT/Augmentative and Alternative Communication (AAC) tools to student need and trains staff on implementation.

➢ Appropriate classroom accommodations and modifications are provided so that students can access grade-level content.

➢ There are opportunities for teachers and related service providers to model skills to students.

➢ Related services and behavior supports are individually designed, implemented, and monitored to align to student need and desired outcomes.

➢ Students with disabilities are provided appropriate instruction in career development and opportunities to participate in work-based learning.

➢ Schools use a student-centered planning approach and incorporate family input.

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Recommendations and Action Steps

1) *Multi-Tiered System of Supports*

- **Re-familiarize all staff with MTSS Guidance**. Provide comprehensive training sessions on the MTSS Guidance to ensure all staff members are familiar with them; create an online resource center with detailed information on the MTSS Guidance that staff members can access at any time.

- **Engage in professional learning on MTSS**. Offer professional development opportunities that specifically focus on MTSS for all school levels, interventions, and its implementation; provide resources and tools for teachers to conduct self-reflection and self-evaluation on their implementation of MTSS.

- **Expand Universal Screening tools.** Research and purchase evidenced-based universal screening tools for academics, including dyslexia and behavior. Ensure the tools are readily available to all schools, especially the elementary level.

- **Constitute a District-Wide MTSS Leadership Team**. Develop a district-wide MTSS leadership team to including representation of all staff and support personnel (central office staff, school-based administrator, general ed teacher, special ed teacher, support personnel, school psychologist, school social worker etc.) and meet monthly to ensure fidelity to the process and consistency across the District. Create an MTSS Continuous Improvement Plan which will span a 3-5 year period and include measurable goals, objectives, timelines, and staff responsibilities. Review and monitor the Continuous Improvement Plan on an on-going basis.

- **School-Based MTSS teams**. Mandate all schools to operate a school-based MTSS team to support data-based decision-making for all aspects of academic and behavioral decisions and develop consistency between schools. Require each school to include an MTSS goal in their School Improvement Plan. Ensure school-based administrators schedule time for teams to discuss the data-based decision-making model to include reviewing progress monitoring, intervention data, and assigning staff for intervention time.

- **Expand Interventions.** Research and purchase additional evidenced-based reading, math, and behavioral interventions. Ensure all schools have access to each intervention in their toolbox to meet the needs of all students requiring additional intervention.

- **Staff for Interventions.** Provide dedicated intervention staff. Ensure special educators will no longer be removed from their case management responsibilities to deliver reading, math, or behavioral interventions. If special educators deliver interventions, adequate staffing at the school level must be required.

2) *Identification Practices and Disproportionality Monitoring*

- **Track disproportionality in disability identification.** At least quarterly, use the risk ratio to measure the identification rates of students with IEPs by race/ethnicity and other important indicators, such as language status, free and reduced lunch status, giftedness, etc., to identify any student group which is two times more likely than their peers to be identified as being over-identified (i.e., risk ratios).

- **Track activity timeliness.** Analyze timelines to assess if there are delays in providing interventions, delays in determining inadequate student progress, delays in initiating a special education evaluation (based on data), and evaluation completions.

3) *Inclusive Practices*

- **Create an inclusive education framework.** Develop and use a structured framework/model that will help promote and support the implementation of best practices for inclusive education including the provision of high yield collaborative teaching, specially designed instruction and related services.

- **Develop an inclusive education implementation guide.** Develop a clearly articulated district/school implementation guide based on the inclusive education framework with expected guidance, procedures and practices.
    o Determine the role of schools to adapt the framework to their unique needs versus District requirements.
    o Establish a maximum student classroom ratio for students with and without disabilities for general education and monitor the ratio to ensure these configurations do not stray from the standard so that SWD do not comprise the majority of students on the class roster.
    o Establish written guidance for the use of inclusive master school schedules, which establish common planning time for collaborative teaching, co-teaching, and other activities for general educators with special education and other personnel. Develop various scheduling models that schools could use and/or adapt.

- **Hire a professional consultant and develop model classrooms.** Hire a nationally known consultant with a reputation of fostering a learning environment of inclusion, building an inclusive practices framework and solidify co-teaching in the general education classroom starting with model classrooms at the elementary level in addition to working at all levels to improve services. Build model co-teaching classrooms starting at the elementary level based on expressed desire from school-based administrators who want to build inclusive learning environments at their campus. Support these school(s) with additional staffing, resources, professional learning, and central office staffing. These schools can be used as model sites for other building teams as they begin building more inclusive practices.

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

- **Redesign Resource Models**. Create one structured resource model providing intensive supplementary academic and social-emotional instruction in areas where students require additional support. Include services where students are given the opportunity to engage in flexible grouping to provide for example, supplementary instruction, reteaching, pre-teaching to achieve at high levels with a focus on grade level content. Additionally, use creative

scheduling so students are not always pulled from the same non-academic classes (Art, Music, PE, Electives) as these classes play an important role in the development of all students.

4) *Specialized Programs*

- **Analyze current specialized programs.** Complete a deep analysis of all student profiles in each specialized program (i.e., Expressions, Pyramid, Learning for Life) and determine the appropriate placement based on area of disability, skill level, communication, assessment data, and student to staff ratios. After assessing student profiles, make any necessary changes to student placement and/or changing the trajectory of their instructional needs. Keep a focus on reducing student transitions for programming reasons and consider developing standards so specialized programs are not routinely displaced.

- **Restructure instructional models.** Based on this program review, analyze gaps in instructional needs, instructional materials, assistive technology, optimizing the learning space, and student to staff ratios etc., within and between programs.
    - Review feeder patterns and create or collapse classes where the need does not currently exist and may need to be reallocated elsewhere in the county.
    - Reconstruct with new models that collectively address all individualized student needs and through evidence-based adapted curriculum to align with grade level content, interaction with non-disabled peers and improve achievement and positive behavior along with social-emotional wellbeing.
    - Develop a walk-through rubric to conduct fidelity checks on a regular basis by school administrators along with central office personnel initially to establish inter-rater reliability. Focus areas should include the physical environment, direct instruction, differentiated lessons, assessment, and data collection, management of student behavior, communication, and collaboration. This tool can also serve to evaluate teacher effectiveness as well.

- **Define and expand services for high functioning students with autism.** Analyze current student functioning levels to determine which students require this highly customized service model, create a profile of a student with high functioning autism, and develop and administer the necessary support and programming for this student group to function successfully in the general education setting. Both academic and social-emotional learning should be integrated into programming considerations for this model to be effective.

- **Research and purchase adapted curriculum.** Investigate additional curricular materials for specialized programs. These classrooms require evidenced based content curriculum for all levels of adapted curriculum classrooms to include reading, math, history, science, and social-emotional learning etc. Learning materials and other resources should be allocated by student need and not limited to any specific program.

- **Expand home school and continuity of specialized programs availability**. Examine the locations of current specialized programs and the opportunities to expand placement in additional feeder patterns to better serve students closer to their home school.
    - Develop continuity of specialized programs across grades in a school to limit student transitions.
    - Establish guidance regarding:
        - Transportation ride times of no more than an hour each way, except in extraordinary circumstances
        - Clear decision protocols, decision-making authority, and communication protocols for when programs need to be added or moved.
        - An expectation that programs remain in school buildings unless there are extenuating circumstances requiring a change (such as a school building opening or closing).

5) *Behavior Support*

- **Provide behavior support training.** Provide staff with a variety of trainings based on needs to include how to de-escalate students, conduct a Functional Behavior Assessment and Behavior Intervention Plan, and school-wide PBIS.
- **Conduct behavior assessment and planning**. Require all students with disabilities having social-emotional and behavioral goals in their IEP to have a Functional Behavior Assessment (FBA) and Behavior Intervention Plan (BIP) completed with ongoing check-ins at least every 6-weeks using multi-disciplinary teams.
- **Staff for behavior support**. During regional team development, include a behavior specialist to support students with disabilities in general education classrooms.

6) *IEP Development*

- **Provide training and guidance.** There were several areas noted that will support staff in developing quality IEPs with consistency and will require training in the following areas.
  - **PLAAFP.** Ensure all staff know how to include all necessary information and data when developing the present levels in the IEP to drive goals and objectives.
  - **Measurable goals.** Support staff in understanding how to write SMART goals so all staff use this format when developing IEPs.
  - **Accommodations/Supplementary Aids.** Provide training and support regarding what accommodations and supplementary aids students need to access the curriculum so IEPs are individualized and able to be implemented with fidelity.
  - **Services.** Ensure all services including consultation are included on the services page to portray transparency to parents of detailed service entries in the IEP.

Leadership and Organization

Goal

To support students with disabilities through the increased collaboration and ownership of school administrators and staff, clearly defined roles, and a strategic vision.

Research to Practice

The commitment of those in leadership roles, and how leaders work together in collaboration, can fundamentally impact the success of students with disabilities in schools. Leaders must establish a vision and organize resources to increase the expectations of students with disabilities by presuming competence and incorporating culturally relevant, growth-oriented practices.

Tenets of high-quality leadership and organization structures include the following elements. Through this review, PCG assessed FCPS against these elements and provides recommendations in areas that require additional improvement.

Vision and Strategic Plan

➢ Special education initiatives are embedded in the district's strategic plan.
➢ The special education department has a clearly articulated and well-communicated vision, mission, and action plan with goals for three to five years, and schools have specific goals that are aligned to the plan.
➢ The district engages in a continuous improvement review process at least every five years to assess the effectiveness of its special education program.
➢ Central office staff across departments and school-based leaders are held accountable for consistently implementing special education policies and procedures.

Shared Accountability

➢ Leaders guide staff toward a common vision and values and embrace the principle that holding all students to high expectations is the shared responsibility of all staff.
➢ Leaders empower students, staff, parents/families, and the community to share responsibility for teaching, learning, and student outcomes.
➢ Leaders model reflection by testing assumptions, learning from data, and adjusting instructional practices accordingly.
➢ Leaders emphasize that building a shared responsibility for student learning is an ongoing, continuous process.

Team Building

➢ In partnership with staff and community stakeholders, leaders create a vision for team collaboration and partnerships.
➢ Leaders develop a plan for communicating the vision with staff, families, and the community to gain support and buy-in.
➢ Leaders equip staff with effective team communication strategies including developing goals and facilitating open communication and building trust.
➢ Staff celebrations are openly shared and discussed at staff meetings, within professional learning communities, and during one-on-one check-ins.
➢ Leaders model the norms of collaboration, including paraphrasing, posing questions, providing data, and presuming positive intentions.

Student-Centered Decision Making

➢ Leaders create a culture of data-centered decision making using formative assessment.
➢ Leaders share beliefs with staff that all students have potential to succeed and improve, and that all staff are responsible for providing the appropriate supports and services.

> ➤ Leaders equip staff to develop student-centered classrooms, which includes planning, implementation, and assessments.
> ➤ Classrooms allow student input and participation in the decision-making process.

Collaboration

> ➤ Leaders intentionally design schedules and provide professional learning opportunities that promote collaboration between educators, related services providers, and paraprofessionals.
> ➤ Leaders support meaningful collaboration with families and train staff on how to schedule, organize, and facilitate an effective meeting with professionals and families.
> ➤ Leaders use positive verbal and nonverbal communication, encouraging the sharing of multiple perspectives, demonstrating active listening, and soliciting feedback from staff, stakeholders, and community partners.
> ➤ Staff are trained to apply collaboration strategies such as sharing ideas, active listening, questioning, and problem solving.
> ➤ Special education leaders are part of the district leadership team and collaborate with other departments.

Resources

> ➤ Administrator of Special Education Professional Leadership Standards, Council for Exceptional Children: https://exceptionalchildren.org/standards/advanced-administrator-special-education-professional-leadership-standards
> ➤ Bagley, S. and Tang, K. Teacher Leadership in Special Education: Exploring Skills, Roles, and Perceptions. Journal of Interdisciplinary Teacher Leadership (JoITL) Vol. 2 Issue 1 December 2018.
> ➤ Honig, M., Copland, M., Rainey, L. et al. (2010). Central Office Transformation for District-wide Teaching and Learning Improvement. Center for the Study of Teaching and Policy, University of Washington: https://www.wallacefoundation.org/knowledge-center/Documents/Central-Office-Transformation-District-Wide-Teaching-and-Learning.pdf
> ➤ Ihoki, D., and Melara, A. (2019). Leadership in Special Education: Fostering Collaboration, Solving Problems, and Being an Agent of Change.
> ➤ Position Statement: Supporting Principals as Leaders of Special Education, National Association of Secondary School Principals: https://www.nassp.org/top-issues-in-education/position-statements/supporting-principals-as-leaders-of-special-education/

Recommendations and Action Steps

7) DSE Organization

- **Special education director.** Work toward eventually appointing one special education director for the DSE to streamline communication and enact the department's vision, in coordination with the Associate Superintendent for Special Education and Student Services.
- **Redesign the DSE organizational structure.** Enact the recommended DSE organizational revisions listed in the Leadership and Organization chapter above, including establishing regional school support teams aligned to feeder patterns and adding inclusion specialists, behavior specialists, and IEP Facilitators. The following description serves as a model organizational structure. It is designed to drive elevating the instructional rigor and high expectations for students with disabilities in FCPS and is aligned with the recommendations in this report.
  - ○ *School Support*
    - ▪ Develop five regional school support teams. These teams would each serve on average 14 schools from two feeder patterns across grades K-12.
    - ▪ Each regional school team should consist of the following roles:
      - Supervisor

- Coordinator for Inclusion and In-Class Collaborative Instruction
- Instructional Specialists (elementary and secondary)
- Inclusion Specialist
- Reading Specialist
- BCBAs (beyond specialized program specific support)
- IEP Facilitator
- Specialized Program Specialist

FCPS may also want to align related service providers and ACTT team members with regional teams as well. This team would work as a unit to support their assigned schools.

- o *Central Office*
  - Assign supervisors to the following functions and determine the appropriate number of coordinators/specialists needed to drive the vision and coordination of these areas districtwide.
  - Districtwide Instructional Initiatives include:
    - Inclusive Practices and Professional Learning
    - Related Services, ACTT, and APE
    - Behavior
    - Specialized Programs
    - Early Childhood and Child Find
    - Section 504 and Nonpublic
    - Operations (Compliance, Data, Technology, and Finance)
- o *In-School Support*
  - Over time, expand the role of the Special Education Program Coordinator (currently dedicated to school-based specialized programs) to support all students with disabilities in the school. Ensure each school has a dedicated school-based coordinator and/or department chair to coordinate and manage IEP meetings. This role could be split between schools if needed.

8) Strategic Vision

- **Vision and Action Plan**. Develop a vision and long-term action plan for the DSE that incorporates the recommendations in this report and those of the Blue Ribbon Task Force.

Family and Community Engagement

Goal

To embrace family and community partnerships in order to make informed decisions and provide equitable opportunities for all students.

Research to Practice

Family engagement is a collaborative and strengths-based process through which education professionals, families, and children build positive and goal-oriented relationships to support the needs of students with disabilities and increase student outcomes.

Tenets of excellent family and community engagement include the following elements. Through this review, PCG assessed FCPS against these elements and provides recommendations in areas that require additional improvement.

Communication

- Staff communicate and work effectively with families.
- Staff support families through their child's transition between grade levels.
- Families receive required notifications and invitations, and they attend meetings.
- Staff are skilled in communicating effectively with families about their child's disability.

Collaboration

- Families are included in the development of school materials, with attention paid to language and culture.
- High percentage of families of students with disabilities are active in the parent-teacher organization.
- Family input and needs are collected through a variety of data-collection tools.
- Families of students with disabilities are involved with the school community activities.
- Concerns of parents/families are resolved in a timely manner.
- The district has a special education parent/family advisory group.

Resource Center and Training

- A family resource center, with staff skilled in special education, is available to all families.
- Staff receive training on working in partnership with families.
- Training for families on the IEP process is provided.

Access

- Families receive IEP documents (e.g., progress reports, meeting invitations, prior written notices, and procedural safeguards) in their native language.
- Families receive information in multiple formats, including electronically.
- Virtual IEP meetings and electronic signature functionality are available.

Community Partnerships

- The district forms partnerships with community colleges, local businesses, and nonprofit organizations to create work-based training and employment opportunities for students.
- The district leverages community partnerships and expertise to complement the academic curriculum with real-life experiences.
- The district understands the community resources to support families.

Resources

➢ Family Engagement: How Often Does It Happen and What Can We Do? National Center for Learning Disabilities: https://ncld.org/news/policy-and-advocacy/family-engagement-how-often-does-it-happen-and-what-can-we-do/
➢ IRIS Center, Vanderbilt University. Module: What Do Educators Need to Understand About Families of Children with Disabilities? https://iris.peabody.vanderbilt.edu/module/fam/cresource/q1/p01/
➢ Office of Special Education Programs, IDEAS that Work: https://osepideasthatwork.org/federal-resources-stakeholders/family-engagement
➢ Partnering with Families Through Special Education Research-based Strategies for Special and General Educators, The Ohio State University Center on Education and Training for Employment: https://cete.osu.edu/wp-content/uploads/2022/08/Special-Education-Research-Brief-2022.pdf

Recommendations and Action Steps

9) Report Recommendations

- **Implement and publicly report recommendation progress. In order to** build community trust, implement the recommendations in this report, develop an action plan and publicly report measurable progress at least twice per year on progress made or obstacles/delays encountered.

10) Advocacy Centers and Parent Training

- **Create parent advocacy center(s)**. Provide support, training, information and best practices for parents through the advocacy center(s), making them integrated and accessible within each feeder pattern (inclusive of all schools) to all families.

- **Parent training plan**. In consultation with representatives of parent support groups, develop a training plan for families in the areas of IEP process, role of the child study team, helpful hints for parents at home, and how families can take an active and collaborative role at IEP meetings.

11) Website

- **Update and expand website resources**. At least annually, review and update materials posted on the FCPS website regarding special education instructional models, related services, and supplementary aids and services. Ensure this information is clearly accessible and comprehensive and accessible to parents with diverse linguistic needs and sensory limitations.

Human Capital

Goal

To invest in people from recruitment to retirement, ensuring highly qualified and effective staff have the skills/training needed to provide services and support to promote the success of diverse learners.

Research to Practice

If educators are not supported in modifying their practice nor given the tools needed to safeguard their well-being, then aspirations around more inclusive, supportive, strengths-based environments will never come to fruition.

Tenets of effective human capital practices include the following elements. Through this review, PCG assessed FCPS against these elements and provides recommendations in areas that require additional improvement.

High-Quality Staff

➢ Staff hold full credentials/licensure and advanced degrees, micro credentials, or skills in specific content areas.
➢ Staff are experts in working with students with and without disabilities.
➢ Staff collaborate with specialized instructional support personnel as needed.

High-Quality Professional Learning

➢ Administration prioritizes professional learning (PL) through effective scheduling.
➢ PL activities meet the needs of staff in their roles.
➢ PL activities are embedded and include classroom observations, peer observations, and self-check inventories.
➢ PL is aligned with evidence-based and promising practices, and with state mandates.
➢ Support staff receive appropriate training to support student academic and behavioral needs.
➢ PL includes a balance of instructional and special education specific topics.
➢ Universal and targeted supports and coaching that include synchronous and asynchronous opportunities through virtual, face-to-face, or blended formats.

Equitable Recruitment Practices

➢ Advertising for diversity occurs through professional organizations, and job listings and websites contain affirmative action policy statements.
➢ Targeting recruitment activities to underrepresented populations occurs through continuously recruiting (even when there are no openings) and using a diverse hiring committee.
➢ Organization offers compensation (or other benefits) for participation in diversity recruitment and community outreach endeavors, including participation in conferences, committees, or coalitions related to diversity and the reduction of disparities.

Staff Wellness and Self-Care

➢ Individual and collective self-care is encouraged and contributes to an overall culture of well-being.
➢ Schools/districts sponsor resources or activities for staff, such as health assessments, physical activity opportunities, substance abuse prevention, and an Employee Assistance Program.
➢ There are adopted policies that encourage wellness and support a healthy school and district environment.

Flexible Career Pathways and Staff Retention

➢ Opportunities for growth, additional training, and career advancement are publicized.
➢ Mentorship programs are available for all staff.
➢ There is an ongoing staff evaluation process that incorporates multiple data points, such classroom observations, student growth measures, IEP implementation, and personal goals.
➢ Staff are involved in student-centered activities or participate in at least one school or district committee annually.
➢ Difficult-to-staff schools or districts have an incentive pay structure that rewards new teachers with a graduated sum of money for each year they return.

Resources

➢ Billingsley, B. (2004). Special Education Teacher Retention and Attrition: A Critical Analysis of the Research Literature. The Journal of Special Education, 38(1), 39–55. https://doi.org/10.1177/00224669040380010401
➢ Billingsley, B., Bettini, E., Jones, N.D. (2019). Supporting Special Education Teacher Induction Through High-Leverage Practices. Remedial and Special Education, 40(6), 365-379. https://journals.sagepub.com/doi/10.1177/00144029221081236
➢ Carpenter-Ware, K., Welch, M., and Battige, S. The Prioritization of Special Educator Well-Being: An Empirical Perspective of Contemporary Importance. American Journal of Educational Research and Reviews, 2022, 7:88, DOI: https://escipub.com/ajerr-2021-12-2105/
➢ Darling-Hammond, L., Hyler, M. E., Gardner, M. (2017). Effective Teacher Professional Development. Palo Alto, CA: Learning Policy Institute: https://learningpolicyinstitute.org/media/476/download?inline&file=Effective_Teacher_Professional_Development_REPORT.pdf
➢ Patton, J. M., Williams, B. T., Floyd, L. O., & Cobb, T. R. (2003). Recruiting and Retaining Culturally and Linguistically Diverse Teachers in Special Education: Models for Successful Personnel Preparation. *Teacher Education and Special Education*, *26*(4), 288–303. https://doi.org/10.1177/088840640302600405
➢ Strategies to Build a Sustainable Special Education Teacher Workforce, National Council on Teacher Quality: https://www.nctq.org/blog/Strategies-to-build-a-sustainable-special-education-teacher-workforce
➢ Theobald, R., Goldhaber, D., Naito, N., and Stein, M. (2020). The Special Education Teacher Pipeline: Teacher Preparation, Workforce Entry, and Retention. CALDER Working Paper No. 231-0220.
➢ Theobald, R. (2020). New Evidence on Special Education Teacher Preparation. CALDER Policy Brief No. 31.
➢ Theobald, R., Goldhaber, D., Holden, K., N., and Stein, M. (2021). Special Education Teacher Preparation, Literacy Instructional Alignment, and Reading Achievement for Students with High-Incidence Disabilities. CALDER Working Paper No. 253-0621.
➢ Thomas, Erika, "The Emotional Labor of Special Educators: A Mixed Methods Study" (2022). West Chester University Doctoral Projects. 165. https://digitalcommons.wcupa.edu/all_doctoral/165

Recommendations and Action Steps

12) Staff Wellbeing

• **Provide opportunities for peer coaching and mentoring**. Develop ways in which teachers can provide coaching and mentoring support to each other, especially for new teachers.

• **Show appreciation for staff.** Invest in special opportunities to thank staff, such as hosting special breakfasts, offering free or reduced cost wellness classes (e.g., yoga and meditation), etc.

13) Professional Learning

- **Professional development plan.** Develop a robust, multi-year professional learning plan based on the needs identified in this report targeted to different audiences, e.g., general educators, special educators, related service personnel, paraprofessionals, parents, etc., and prioritize its implementation. Ground training in the Learning Forward Standards for Professional Learning[73] and embed the following components:
  - o **Mandatory annual trainings.** Determine which special education specific trainings principals, teachers, and other school-based staff are required to attend each year and develop a process to ensure this happens.
  - o **Cross-functional teams**. Cross-train individuals from different divisions/departments to maximize their knowledge and skills to leverage their collective resources to provide direct support, mentoring, coaching, and technical assistance to principals and teachers.
  - o **High quality trainers.** Ensure all trainers are knowledgeable and effective. Identify and use exemplary school-based staff in addition to others.
  - o **Access to differentiated learning and coaching.** Differentiate professional learning according to each audience's skills, experience, and needs. Have professional learning and technical assistance continue for new personnel and those needing additional support.
  - o **Multiple formats.** Use multiple formats (e.g., videos, webinars, and narrative text) and presentation approaches (e.g., school-based, small groups). Continue to build out blended learning opportunities so that all staff can more easily access the content.
  - o **Exemplary implementation models**. Identify and share districtwide best practices that demonstrate high expectations and effective implementation to ensure they include students with IEPs, etc. Encourage staff to visit exemplary schools and set aside time for that to happen.

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[73] Retrieved from http://www.learningforward.org/standards#.UMvVD7Yt0kU

Systems and Structures

Goal

To define expectations for service delivery, resource allocation, and data management infrastructure to guide data-driven decisions.

Research to Practice

Operational excellence is demonstrated in several ways. It is shown through adherence to sound financial practices and to continuous, data-driven improvement.

The support of effective systems and structures include the following elements. Through this review, PCG assessed FCPS against these elements and provides recommendations in areas that require additional improvement.

Equitable Funding and Staffing

➢ The equitable distribution of school-based special education funding is based on the resources used to serve students with disabilities, such as teacher or aide salaries and supplies, and takes into consideration the varying costs that depend on type of disability, placement, and student need.

➢ Administrators take proactive steps to coordinate funding of special education services within the larger school program.

➢ IDEA grant expenditures are tracked and intentionally tied to specific programmatic goals.

➢ Staffing ratios support an inclusive instructional service delivery model and can be adjusted mid-year to accommodate changes in student need.

Policy and Procedures

➢ An electronic, user-friendly, and accessible special education policy manual for school teams and families exists on a publicly available site and is updated annually.

➢ Internal guidance and procedures are documented, accessible to all staff, and updated regularly.

Data Quality, Culture, and Capacity

➢ Benchmark, goal progress, and continuous progress monitoring provide timely information for programmatic and student-centered decision making.

➢ Dashboards are easily accessible to general education and special education staff, principals, and others so they can routinely monitor identification rates, placement levels, and discipline rates by school and grade.

➢ The district uses an electronic case management system to document provision of all special education services including progress, track IEP documentation for compliance, and provide access to indicators and other data for monitoring and trend analysis.

➢ School and district staff are well versed in the State Performance Plan (SPP) indicators, have easy-to-use reports to monitor them, and conduct data reviews of progress.

➢ Staff receive training on how to use data systems to make decisions.

Resources

➢ Data-Based Special Education Workload Staffing Analysis, Texas School Board Association: https://www.tasb.org/services/student-solutions/workload-staffing-analysis.aspx

➢ ESC 20 – Special Education Resources and Staffing Allocations: https://www.esc20.net/apps/pages/special-education-resources-staffing-considerations

➢ Improving Decision-Making for Impact: Important Considerations for Special Educators and Implementation Teams, Johns Hopkins School of Education: https://education.jhu.edu/research/article/improving-decision-making-for-impact/

➢ Giangreco, M., and Suter, J. Precarious or Purposeful? Proactively Building Inclusive Special Education Service Delivery on Solid Ground. Inclusion (2015) 3 (3): 112-131. https://meridian.allenpress.com/inclusion/article-abstract/3/3/112/241/Precarious-or-Purposeful-Proactively-Building

➢ Recommended Practices to Address Staffing Concerns, Inclusive Schools Network: https://inclusiveschools.org/recommended-practices-to-address-staffing-concerns/

➢ Yates, P.A., Chopra, R.V., Sobeck, E.E., Douglas, S.N., et al. (2020). Working with Paraeducators: Tools and Strategies for Planning, Performance Feedback, and Evaluation. *Intervention in School and Clinic, 56(1), 43-50.* https://macape.org/membership-sponsorship-info/

Recommendations and Action Steps

14) Written Procedures

- **Review and edit current procedures**. Streamline procedures and clarify guidance for special educators to build consistency throughout the District. Ensure that all staff know where to access this and can use it on a regular basis. This should also be reviewed and updated so staff know where to go for updates on changes to systems, policies, and procedures.

15) Online IEP System

- **Investigate purchasing a new online IEP system**. Explore options for streamlining the IEP development process and improve efficiency through the use of more effective technology, thereby taking the burden off teachers for extensive or redundant paperwork. Prioritize tools with parent portal capabilities and the ability to translate IEP documents into parents' native languages to enhance parent engagement and communication.

16) Staffing Allocations

- **Conduct a Workload/Time Assessment Analysis and Determine Appropriate Staff Allocations.** Conduct a workload/time assessment of special education teachers and review different models to support, for example, a 4:1 schedule so special education teachers have one full day per week to complete paperwork tasks, or other ways to support providing time to complete paperwork tasks efficiently. As part of this analysis, map the time spent conducting various activities (e.g., IEP writing, parent communication, data entry, service delivery, etc.). Reallocate staffing in alignment with these findings.

- **SEIA Allocations.** Consider restructuring the current formula for SEIA allocations and convert these positions into licensed, highly qualified special education teachers to reduce caseload numbers and support a collaborative/co-teaching model with fidelity. Alternatively, should teacher positions go unfilled due to staffing shortages nationwide, provide extensive training and coaching support to SEIAs.

From Strategy to Execution

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

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

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

Exhibit 66. PCG's Strategy Execution Process
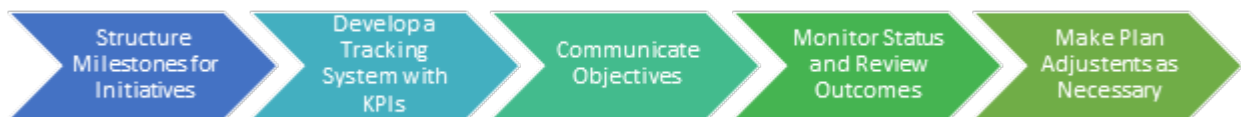
Structure Milestones for Initiatives

Action plans must include concrete, measurable milestones that can be assessed on a regular basis. These milestones break down initiatives into manageable steps and timelines. This structure is essential, especially given the school year cycle and the urgency by which FCPS would like to move these critical initiatives forward. At minimum, given the nature of the initiatives, progress toward milestones should be reviewed monthly through the 2023-24, 2024-25, and 2025-26 school years.

Develop a Tracking System with KPIs

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

Communicate the Objectives

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

Monitor Progress and Review Outcomes

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

Make Plan Adjustments as Necessary

An action plan is a fluid document that must be revised and updated as the FCPS environment changes and grows. Openness to revising the action plan will enable FCPS to adjust to shifting fiscal and regulatory realities as well as changing priorities. If FCPS's core leadership team sees progress on certain initiatives falling short of expectations, a reevaluation of the original objectives and approach may be needed. However, it is also important to assess the root cause of discrepancies between actual and planned results.

X. APPENDIX

Staffing Ratios

Special Educators, SEIAs, Speech/Language Pathologists, and Psychologists

Ratios for Special Educator, Paraeducator, Speech/Lang, and Psychologist	State	Total Enrollment	Incidence		Special Educator			Paraeducator			Speech/Lang			Psychologist	
			% SpEd	SpEd Enr	Number	Sped	All	Number	Sped	All	Number	Sped	All	Number	Sped
Agawam Public Schools	MA	4,347	15.1%	656	39	16.8	111.5	100	6.6	43.5	15	43.7	289.8	3	218.7
Albuquerque PS	NM	82,049	20.4%	16,738	1217	13.8	67.4	1290	13.0	63.6	161.5	103.6	508.0	98	171.5
Alexandria City Public Schools	VA	15,105	12.6%	1,896	189	10.0	79.9	151	12.6	100.0	28	67.7	539.5	20	96.2
Anchorage School Dist	AK	41,375	15.8%	6,522	794.32	8.2	52.1	706.66	9.2	58.6	65	100.3	636.5	44.7	145.9
Arlington ISD	TX	56,840	8.4%	4,799	422	11.4	134.7	455	10.5	124.9	72	66.7	789.4	21	228.5
Arlington Pub Sch	VA	29,653	12.9%	3,811	415.7	9.2	71.3	270	14.1	109.8	36.6	104.1	810.2	37.9	100.6
Atlanta Public Schools	GA	49,858	9.9%	4,950	431	11.5	115.7	224	22.1	222.6	65	76.2	767.0	22	225.0
Austin Pub S D	TX	84,676	9.5%	8,062	772.5	10.4	109.6	824	9.8	102.8	70.5	114.4	1201.1	34.6	233.0
Baltimore City Publ Sch	MD	82,824	15.5%	12,866	1,121	11.5	73.9	620	20.8	133.6	92	139.8	900.3	NA	NA
Baltimore County P Sch	MD	111,084	15.1%	16,761	1245.8	13.5	89.2	665.5	25.2	166.9	154.7	108.3	718.1	85.3	196.5
Bellevue SD	WA	19,886	9.8%	1,947	82.7	23.5	240.5	118.6	16.4	167.7	17.4	111.9	1142.9	17.3	112.5
Boston Public Schools	MA	54,966	20.6%	11,350	1242.3	9.1	44.2	800	14.2	68.7	147	77.2	373.9	76.8	147.8
Bridgeport	CT	19,330	17.8%	3,449	204	16.9	94.8	254	13.6	76.1	25	138.0	773.2	33	104.5
Buffalo Public Schools	NY	46,583	16.6%	7,744	696	11.1	66.9	365	21.2	127.6	105	73.8	443.6	62	124.9
Cambridge Publ Schools	MA	6,818	17.6%	1,200	240.03	5.0	28.4	142.5	8.4	47.8	20	60.0	340.9	22	54.5
Carpentersville	IL	20,985	15.0%	3,139	220	14.3	95.4	380	8.3	55.2	43	73.0	488.0	28	112.1
Chicago Public Schools	IL	340,658	14.6%	49,736	4,329	11.5	78.7	4,949	10.1	68.8	390	127.5	873.5	258	192.8
Cincinnati Pub Schools	OH	51,431	17.4%	8,928	457	19.5	112.5	801	11.1	64.2	62	144.0	829.5	57.7	154.7
Clark Cty School Dist	NV	322,901	12.6%	40,777	2,221	18.4	145.4	1,346	30.3	239.9	299	136.4	1079.9	180	226.5
Cleve Hts-UnivHtsCty	OH	4,874	18.5%	900	83	10.8	58.7	58	15.5	84.0	7	128.6	696.3	8	112.5
Cleveland PS	OH	39,018	21.4%	8,350	855	9.8	45.6	486	17.2	80.3	81	103.1	481.7	82	101.8
Columbus City	OH	53,740	18.1%	9,727	650	15.0	82.7	990	9.8	54.3	64	152.0	839.7	78	124.7
Compton Unified SD	CA	26,000	11.5%	2,981	126	23.7	206.3	118	25.3	220.3	5	596.2	5200.0	14	212.9
D.C. Public Schools	D.C	51,036	15.0%	7,655	669	11.4	76.3	653	11.7	78.2	90	85.1	567.1	78	98.1
Dallas PS	TX	148,021	9.1%	13,470	1078	12.5	137.3	868.5	15.5	170.4	81	166.3	1827.4	37	364.1
Davenport Comm Sch	IA	15,234	12.2%	1,857	221	8.4	68.9	344	5.4	44.3	NA	NA	NA	NA	NA
Deer Valley Unified SD	AZ	31,944	10.3%	3,289	299	11.0	106.8	312	10.5	102.4	50	65.8	638.9	34	96.7
DeKalb 428	IL	6,285	14.0%	879	58	15.2	108.4	205	4.3	30.7	9	97.7	698.3	7	117.2
Denver Public Schools	CO	72,737	12.6%	9,142	592	15.4	122.9	528	17.3	137.8	94	97.3	773.8	98	93.3
DesMoines Public Schls	IA	31,621	14.8%	4,680	479	9.8	66.0	600.1	7.8	52.7	118.4	39.5	267.1	11.5	407.0
Detroit	MI	54,229	16.1%	8,731	535.8	16.3	101.2	458	19.1	118.4	98	89.1	553.4	40	218.3
Elgin U-46	IL	37,403	14.2%	5,304	252.8	21.0	148.0	544	9.8	68.8	71.9	73.8	520.2	20	265.2
ESD 112	WA	13,764	14.4%	1,987	55	36.1	250.3	158	12.6	87.1	20	99.4	688.2	12	165.6
Everett Pub Schools	WA	20,102	14.1%	2,840	356	8.0	56.5	51	55.7	394.2	4	710.0	5025.5	5	568.0
Fort Worth	TX	79,421	8.4%	6,651	520	12.8	152.7	450	14.8	176.5	73	91.1	1088.0	31	214.5
Frederick County PS	MD	46,899	11.1%	5,217	428	12.2	109.6	712	7.3	65.9	99	52.7	473.7	54	96.6
Fresno PS	CA	73,848	11.2%	8,271	509.6	16.2	144.9	603.1	13.7	122.4	75.5	109.5	978.1	65.7	125.9
Garland ISD	TX	53,930	10.0%	5,393	371	14.5	145.4	338	16.0	159.6	57	94.6	946.1	9	599.2
Greenville County	SC	73,291	13.5%	9,894	463	21.4	158.3	376	26.3	194.9	93	106.4	788.1	25	395.8
Guilford County	SC	78,609	12.8%	10,062	575	17.5	136.7	448	22.5	175.5	127.7	78.8	615.6	52.33	192.3
Houston Indepen SD	TX	196,550	8.6%	16,923	1,625	10.4	121.0	1,145	14.8	171.7	158	107.1	1244.0	21.01	805.5
Jacksonville County	FL	24,247	11.3%	2,740	193	14.2	125.6	89	30.8	272.4	25	109.6	969.9	110	24.9
Kalamazoo Pub Schools	MI	13,000	12.8%	1,667	70	23.8	185.7	79	21.1	164.6	15	111.1	866.7	NA	NA
Kent Pub Schools	WA	26,418	11.4%	3,017	148.7	20.3	177.7	318	9.5	83.1	32.3	93.4	817.9	34.5	87.4
Kyrene School District	AZ	16,342	10.3%	1,686	141	12.0	115.9	124	13.6	131.8	27	62.4	605.3	14	120.4
Lake Washington	WA	31,964	9.5%	3,021	161	18.8	198.5	241.5	12.5	132.4	32.6	92.7	980.5	26.2	115.3

District	State	Enrollment	%												
Lakota Local	OH	16,800	13.7%	2,300	126	18.3	133.3	120	19.2	140.0	39	59.0	430.8	18	127.8
LAUSD	CA	464,731	13.7%	63,826	5,331	12.0	87.2	6,466	9.9	71.9	496	128.6	936.1	514	124.3
Lincoln	NE	1,060	18.9%	200	21	9.5	50.5	60.7	3.3	17.5	5	40.0	212.0	2	100.0
Madison Pub Schls	WI	25,952	14.7%	3,808	415.6	9.2	62.4	448	8.5	57.9	76.2	50.0	340.6	42.5	89.6
Marlborough Pub Sch	NJ	4,532	11.8%	536	141	3.8	32.1	115	4.7	39.4	7	76.6	647.4	4	134.0
Miami-Dade	FL	334,000	12.0%	40,012	2,500	16.0	133.6	1,226	32.6	272.4	209	191.4	1598.1	206	194.2
Milwaukee	WI	71,325	23.0%	16,406	1281	12.8	55.7	988	16.6	72.2	169	97.1	422.0	136	120.6
Montgomery County Schools	MD	160,564	14.2%	22,851	2,086	11.0	77.0	1,751	13.1	91.7	293	78.0	548.0	136.3	167.7
N. Chicago (in Dist.)	IL	3,319	12.0%	399	39	10.2	85.1	27	14.8	122.9	8	49.9	414.9	5	79.8
Naperville 203	IL	16,995	12.1%	2,064	150	13.8	113.3	237	8.7	71.7	33	62.5	515.0	22	93.8
Nashville City	TN	82,447	12.3%	10,141	680.5	14.9	121.2	594	17.1	138.8	109	93.0	756.4	65.5	154.8
New Bedford	MA	12,880	20.6%	2,655	204	13.0	63.1	205	13.0	62.8	26	102.1	495.4	9	295.0
Norfolk	VA	32,066	13.5%	4329	381	11.4	84.2	304	14.2	105.5	35	123.7	916.2	23	188.2
Northern Valley RHSD	NJ	2,249	22.3%	502	28	17.9	80.3	30	16.7	75.0	1	502.0	2249.0	3	167.3
Oak Park Sch Dist 97	IL	6,042	13.0%	786	78	10.1	77.5	90	8.7	67.1	14	56.1	431.6	8	98.3
Oakland Unified SD	CA	35,565	15.1%	5,369	392	13.7	90.7	175	30.7	203.2	47	114.2	756.7	43.5	123.4
Omaha City	NE	53,191	17.2%	9,149	485	18.9	109.7	470.5	19.4	113.1	85	107.6	625.8	33	277.2
Orange County	FL	219,684	11.1%	24,385	NA	NA	NA	1165	20.9	188.6	202	120.7	1087.5	99.5	245.1
Pinellas County	FL	113,084	13.0%	14,701	881	16.7	128.4	774	19.0	146.1	150	98.0	753.9	79	186.1
Pittsburgh Pub Schools	PA	21,638	23.6%	5,096	359	14.2	60.3	554	9.2	39.1	40	127.4	541.0	138	36.9
Portland Public Schools	OR	46,937	15.4%	7,229	355	20.4	132.2	535	13.5	87.7	92	78.6	510.2	56	129.1
Prince William County Schools	VA	89,076	12.7%	11,304	774	14.6	115.1	362	31.2	246.1	67	168.7	1329.5	57.6	196.3
Providence	RI	21,694	20.6%	4,460	340	13.1	63.8	479.1	9.3	45.3	40	111.5	542.4	28	159.3
Renton	WA	15,707	13.4%	2,108	170.1	12.4	92.3	294	7.2	53.4	20	105.4	785.4	18.4	114.6
Rochester City	NY	27,360	20.0%	5,472	559.2	9.8	48.9	428	12.8	63.9	148	37.0	184.9	64	85.5
Rockford Pub S	IL	28,194	14.0%	3,948	336	11.8	83.9	334	11.8	84.4	49	80.6	575.4	24	164.5
Round Rock	TX	48,421	9.1%	4,407	369	11.9	131.2	171	25.8	283.2	41	107.5	1181.0	29	152.0
Sacramento City	CA	46,899	13.9%	6,519	288.1	22.6	162.8	246.2	26.5	190.5	33	197.5	1421.2	50.8	128.3
San Diego Unified SD	CA	103,024	14.4%	14,787	1,100	13.4	93.7	1,300	11.4	79.2	196	75.4	525.6	129	114.6
Saugus	MA	3,012	15.3%	462	32.44	14.2	92.8	74	6.2	40.7	6	77.0	502.0	2	231.0
Sch Dist of Philadelphia	PA	119,492	28.2%	33,686	1,564	21.5	76.4	2585	13.0	46.2	99	340.3	1207.0	149	226.1
Scottsdale	AZ	22,233	13.0%	2,891	349.77	8.3	63.6	230	12.6	96.7	39.4	73.4	564.3	28.4	101.8
Seattle	WA	58,248	12.5%	7,281	548.8	13.3	106.1	823.3	8.8	70.7	82.2	88.6	708.6	60.2	120.9
Shelby County (Was Memphis City)	TN	109,319	15.2%	16,637	942	17.7	116.0	655	25.4	166.9	53	313.9	2062.6	58	286.8
South Hunterton Regional SD	NJ	872	18.3%	160	31.3	5.1	27.9	25	6.4	34.9	3	53.3	290.7	1.5	106.7
St. Paul	MN	36,004	16.0%	5,761	481.2	12.0	74.8	536	10.7	67.2	97	59.4	371.2	19	303.2
Stockton	CA	39,607	11.2%	4,436	258	17.2	153.5	344	12.9	115.1	47	94.4	842.7	36	123.2
Sun Prairie Area S Dist	WI	7,655	9.1%	697	62	11.2	123.5	93	7.5	82.3	14	49.8	546.8	7	99.6
Tacoma Pub Schl	WA	28,374	13.7%	3,894	186.1	20.9	152.5	213	18.3	133.2	33.6	115.9	844.5	33.6	115.9
Tucson Unified SD	AZ	44,709	18.1%	8,092	409	19.8	109.3	419	19.3	106.7	61	132.7	732.9	54	149.9
Washoe County Dist	NV	61,599	14.3%	8,809	472	18.7	130.5	325	27.1	189.5	77	114.4	800.0	48	183.5
West Aurora SD	IL	12,316	13.7%	1,688	120	14.1	102.6	101	16.7	121.9	21	80.4	586.5	13	129.8
Williamson Cty Schl	TN	40,683	6.9%	2,824	213	13.3	191.0	400	7.1	101.7	34	83.1	1196.6	23	122.8
Worcester	MA	23,986	5.3%	1,260	254	5.0	94.4	366	3.4	65.5	38	33.2	631.2	NA	NA
Averages			14%			14.1	105.7		15.1	114.3		117.2	857.1		175.8	

Overall Ranking by Position

District No.	% IEPs	Special Educators	Paraeducators	Speech/Lang Pathologists	Psychologists
1	5.3%	3.8	3.3	33.2	24.9
2	6.9%	5.0	3.4	37.0	36.9
3	8.4%	5.0	4.3	39.5	48.1
4	8.4%	5.1	4.7	40.0	54.5
5	8.6%	8.0	5.4	43.7	58.1
6	9.1%	8.2	6.2	46.5	79.8
7	9.1%	8.3	6.4	49.8	85.5
8	9.1%	8.4	6.6	49.9	87.4
9	9.5%	9.1	7.1	50.0	89.6
10	9.5%	9.2	7.2	52.7	93.3
11	9.8%	9.2	7.3	53.3	93.8
12	9.9%	9.3	7.5	56.1	96.2
13	10.0%	9.5	7.8	59.0	96.6
14	10.3%	9.6	8.3	59.4	96.7
15	10.3%	9.8	8.4	60.0	98.1
16	11.1%	9.8	8.5	62.4	98.3
17	11.1%	9.8	8.7	62.5	99.6
18	11.2%	10.0	8.7	65.8	100.0
19	11.2%	10.1	8.8	66.7	100.6
20	11.3%	10.2	9.2	67.7	101.8
21	11.4%	10.4	9.2	67.7	101.8
22	11.5%	10.4	9.3	73.0	104.5
23	11.8%	10.8	9.5	73.4	106.7
24	12.0%	11.0	9.8	73.8	112.1
25	12.0%	11.0	9.8	73.8	112.5
26	12.0%	11.1	9.8	75.4	112.5
27	12.1%	11.2	9.9	76.2	114.6
28	12.2%	11.4	10.1	76.6	114.6
29	12.3%	11.4	10.5	77.0	115.3
30	12.5%	11.4	10.5	77.2	115.9
31	12.6%	11.5	10.7	78.0	117.2
32	12.6%	11.5	10.7	78.6	120.4
33	12.6%	11.5	11.1	78.8	120.6
34	12.7%	11.8	11.4	80.4	120.9
35	12.8%	11.9	11.7	80.6	122.8
36	12.8%	12.0	11.8	83.1	123.2
37	12.9%	12.0	12.5	85.1	123.4
38	13.0%	12.0	12.6	88.6	124.3
39	13.0%	12.2	12.6	89.1	124.7
40	13.0%	12.4	12.6	91.1	124.9
41	13.4%	12.5	12.8	92.7	125.9
42	13.5%	12.8	12.9	93.0	127.8
43	13.5%	12.8	13.0	93.4	128.3
44	13.7%	13.0	13.0	94.4	129.1
45	13.7%	13.1	13.0	94.6	129.8
46	13.7%	13.3	13.1	97.1	134.0
47	13.7%	13.3	13.5	97.3	145.9
48	13.9%	13.4	13.6	97.7	147.8
49	14.0%	13.5	13.6	98.0	149.9
50	14.0%	13.7	13.7	99.4	152.0
51	14.1%	13.8	14.1	100.3	154.7
52	14.2%	13.8	14.2	102.1	154.8
53	14.2%	14.1	14.2	103.1	159.3
54	14.3%	14.2	14.8	103.6	164.5
55	14.4%	14.2	14.8	104.1	165.6
56	14.4%	14.2	14.8	105.4	167.3
57	14.6%	14.3	15.5	106.4	167.7
58	14.7%	14.5	15.5	107.1	171.5
59	14.8%	14.6	16.0	107.5	183.5
60	15.0%	14.9	16.4	107.6	186.1
61	15.0%	15.0	16.6	108.3	188.2

62	15.0%	15.2	16.7	109.5	192.3
63	15.1%	15.4	16.7	109.6	192.8
64	15.1%	16.0	17.1	111.1	194.2
65	15.1%	16.2	17.2	111.5	196.3
66	15.2%	16.3	17.3	111.9	196.5
67	15.3%	16.7	18.3	114.2	212.9
68	15.4%	16.8	19.0	114.4	214.5
69	15.5%	16.9	19.1	114.4	218.3
70	15.8%	17.2	19.2	115.9	218.7
71	16.0%	17.5	19.3	120.7	225.0
72	16.1%	17.7	19.4	123.7	226.1
73	16.6%	17.9	20.8	127.4	226.5
74	17.2%	18.3	20.9	127.5	228.5
75	17.4%	18.4	21.1	128.6	231.0
76	17.6%	18.7	21.2	128.6	233.0
77	17.8%	18.8	22.1	132.7	245.1
78	18.1%	18.9	22.5	136.4	265.2
79	18.1%	19.5	25.2	138.0	277.2
80	18.3%	19.8	25.3	139.8	286.8
81	18.5%	20.3	25.4	144.0	295.0
82	18.9%	20.4	25.8	152.0	303.2
83	20.0%	20.9	26.3	166.3	364.1
84	20.4%	21.0	26.5	168.7	395.8
85	20.6%	21.4	27.1	191.4	407.0
86	20.6%	21.5	30.3	197.5	568.0
87	20.6%	22.6	30.7	313.9	599.2
88	21.4%	23.5	30.8	340.3	805.5
89	22.3%	24	31.2	502.0	NA
90	23.0%	24	32.6	596.2	NA
91	23.6%	36	33.9	710.0	NA
	28.2%	**14.0**	**15.3**	**115.9**	**173.0**

Golden Thread Framework

For a student with a disability, his or her IEP team is charged with ensuring that the evaluation supports the existence of a disability and shows a clear connection to the Present Levels of Academic Achievement and Functional Performance (PLAAFP) statement, identified learner characteristics, least restrictive environment considerations, and selected accommodations for instruction and assessment. This logical progression through the body of evidence, known as the ***Golden Thread***, should connect the pieces to tell a student's complete educational story.

Exhibit 67. PCG's Golden Thread Framework
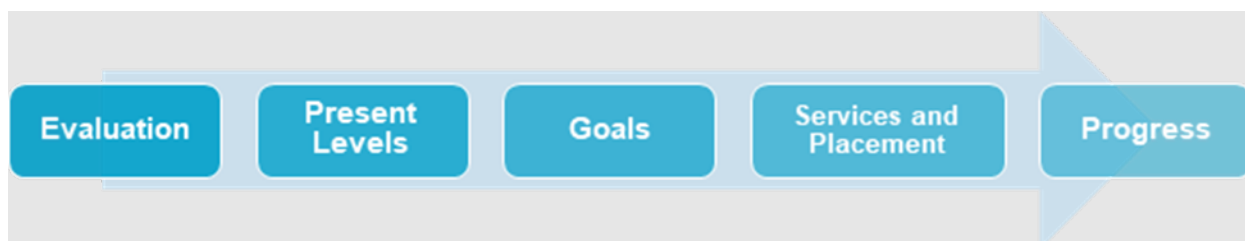
Evaluation - What are the student's characteristics as a learner? What is his/her documented disability? How do the evaluation results inform an instructional plan?

Present Levels - What is the student's present level of academic achievement and functional performance (PLAAFP)? How can access to grade-level standards be ensured regardless of the disability or language barrier?

Measurable Annual Goals - What can the child reasonably be expected to accomplish within one year? What types of instructional tasks are expected of the student to demonstrate proficiency in grade-level content? Are goals reasonably ambitious and achievable, and do they address all areas of need?

Services and Placement - What services will be provided? By whom and for what frequency? What accommodations are needed for learning in multiple settings? What services and supports are needed for the student to progress in all identified areas? Are accommodations documented and used as a foundation for classroom instruction and assessment? Where and how will the student receive services?

Progress Reports - What data are being collected on the fidelity of IEP implementation as well as on student progress toward meeting IEP goals? Is the student making progress?

Quality Indicator Review

This Quality Indicator Review, based on the tenets of the Golden Thread Framework, focuses on areas essential to the development of quality Evaluation, IEP, and Progress Monitoring documentation. Taken together, these documents for students with disabilities provide a comprehensive view of their access, participation, and progress in the general education curriculum and address other disability needs.

The quality indicators are based on these foundational assumptions:
- Results of individual evaluations provide the information the IEP team needs to make its recommendations.
- The student's strengths and needs guide IEP development.
- The IEP team considers the interrelationship of the impact of the student's disability and the components of the IEP.
- IEP development occurs in a structured, sequential manner.
- IEPs include documentation of recommendations in a clear and specific manner so the IEP can be implemented consistent with the evaluation team's recommendations.
- Annual goals are identified to enable the student to progress in the general education curriculum and meet other disability-related needs.

- The IEP team determines how student needs will be met in the least restrictive environment.
- The IEP team demonstrates knowledge of grade level general education curricular and behavioral expectations and benchmarks.
- IEPs are implemented with fidelity and adjusted based on student response to instruction.
- Ongoing progress monitoring and formative assessment of student progress, goals and objectives are consistently implemented.
- Revisions to the IEP are made based on data indicating changes in student needs or abilities.
- IEPs for students with disabilities developed by the evaluation team result in students' access, participation and progress in the general education curriculum and address a student's other disability needs.
- PCG used five overarching quality indicators to assess files. The rubric included specific "look-fors," or classifications of evidence, under each indicator.

Exhibit 68. PCG's Golden Thread Evidence Rubric

Indicator	Evidence
1. Results of individual evaluations provide the information the Evaluation Team needs to make its recommendations.	• Evaluation results are reported in a manner that provides sufficient basis for: present levels of academic and functional performance (PLAAFP); comparison to typically developing peers and grade-level expectations; unique learning characteristics and educational needs of the student; development of IEP annual goals and, as appropriate, short-term instructional objectives and benchmarks; and transition activities. • Evaluation results provide sufficient baseline information for future determination of progress in all areas of the suspected disability. • Evaluation reports are written in clear, precise, and easily understood language that is: jargon free, succinct, and provided in a language/mode of communication understood by the parent. • Evaluation reports identify the nature and extent to which the student may need environmental modifications or accommodations; human and material resources to support learning in the general education curriculum and environment. • Evaluation reports provide instructionally relevant information that provides insight into the student's learning characteristics and needs and supports development and provision of instruction likely to result in achievement of the student's IEP goals. • The Evaluation Team reviews, discusses, analyzes, and evaluates the student's progress in order to address his/her unique needs related to the disability.
2. The IEP Team considers the interrelationship of the impact of the student's disability and present levels in the IEP.	• PLAAFPs establish a measurable baseline of student's abilities and needs for determining progress. • Parent input is solicited and included in the development of the IEP. • Clear, concise PLAAFP statements are written in user friendly language, and are a thorough description of student strengths and needs.
3. Annual goals are identified to enable the student to progress in the general education curriculum and meet other disability related needs.	• Annual goals focus on the knowledge, skills, behaviors and strategies to address the student's needs. • Goals are developed in consideration of the student's need to progress toward the State standards by identifying the foundation knowledge (e.g., reading/math) necessary to meet the standards and/or the learning strategies that will help him or her to learn the curriculum content. • Targeted learning outcomes/goals are closely aligned to the general education curriculum and aligned with the age/developmental level of the class or grade level. • Annual goals define the path from the student's present level of performance to a level of performance expected by the end of the year. • IEP goals and objectives are: instructionally relevant; measurable, aligned with identified targeted needs; reasonably achieved in the period covered by the IEP; congruent with the student's ability/disability; and designed to support participation and success in the general education curriculum.

4.The IEP Team determines how student needs will be met in the least restrictive environment.	• The IEP Team uses knowledge of the continuum of appropriate academic and behavior intervention strategies for subject areas and age/developmental levels.
	• The IEP includes support for school personnel (professional development or technical assistance) as needed to implement the IEP.
	• The IEP Team considers issues of access, participation and progress in relation to each individual student's needs, including, but not limited to, consideration of: curriculum content; modifications to instructional materials; rate of learning; physical environments; demonstration of learning; instructional approaches; instructional supports; and behavioral supports.
	• Recommended special education program and services, accommodations, and modifications needed for student to achieve goals are discussed.
	• The IEP Team actively considers and recommends accommodations or modifications to instruction and/or the use of assistive technology as necessary to ensure access to the general education curriculum.
	• A student's performance on classroom, state, and/or and district-wide assessments is discussed, considered, and documented.
	• Placement is the last recommendation made in consideration of the least restrictive environment in which the student's IEP can be implemented.

Staff Survey Results

	Agree	Disagree	Don't Know	N/A	Responses
Before a student is referred for special education, every attempt is made to meet the student's needs through general education interventions.	77.3	12.8	8.2	1.7	1,092
Our school provides sufficient Tier 1 general education reading intervention support. (Tier 1 means all students receive high-quality, scientifically based instruction provided by qualified personnel.)	75.9	13	8.9	2.1	1,085
Our school provides sufficient Tier 1 general education math intervention support.	69.1	15.6	12.2	3	1,089
Our school provides sufficient Tier 1 general education behavior intervention support.	61.8	28.9	7.5	1.9	1,081
Prior to a referral for special education, the impact of a child's native language on academic performance or behavior is considered.	74.6	7.8	15.2	2.3	1,083
I fully understand the steps and timelines associated with the referral process.	70.8	18.6	6.4	4.1	1,087
I am comfortable recommending a student be referred for a special education evaluation.	71.7	14.7	3.7	9.9	1,083
Staff in my school(s) fully understand the steps and timelines associated with the referral process.	53.1	31.4	13	2.5	1,083
There is no delay in the process when a student is referred for special education services.	57.9	22.5	16.9	2.8	1,080
I have been invited to participate in IEP meeting(s).	75.9	12.2	0.7	11.2	1,082
I am given adequate time/coverage when participating in IEP meeting(s).	61.6	15	0.9	22.5	1,081

I am a valued member of the IEP team.	70.4	12.3	3.1	14.3	1,080
I feel comfortable asking questions at IEP meetings.	69.8	9	1.2	20.1	1,082
I feel comfortable expressing concerns at IEP meetings.	68.3	10.2	1.4	20.1	1,077
The IEP process involves collaboration between general education teachers, special educators, and parents.	88.7	5.9	2.7	2.7	1,075
Parents are given a meaningful opportunity to participate in IEP meetings.	89.6	2.2	4.8	3.3	1,082
All team member concerns are addressed at IEP meetings.	76.2	10.5	8.9	4.4	1,080
Special education evaluations are sufficiently comprehensive to identify students' specific strengths and needs.	75.7	11.2	9.9	3.3	1,076
The results of special education evaluations are shared with me in ways that provide meaningful insights into students' educational needs.	68.7	22.1	2.5	6.7	1,081
The IEP team discusses instruction and support in general education classes to the maximum extent possible when making service recommendations for students with disabilities.	72.4	13.6	9.2	4.8	1,077

	Agree	Disagree	Don't Know	N/A	Responses
FCPS offers a continuum of services to meet the needs of all students with IEPs.	62.3	30.6	5.7	1.3	980
Students with IEPs in my school(s) are receiving instruction and services in general education classes to the maximum extent possible.	74.6	17.5	6.1	1.7	981
Students with disabilities at my school(s) are treated with respect by school staff and students.	93.1	6.3	0.4	0.2	981

My school(s) provide an inclusive environment for students with disabilities.	93.3	5.2	0.3	1.2	979
Student progress toward IEP goals is analyzed and discussed regularly by his/her teachers and/or related service provider(s).	67.4	21.3	9	2.3	982
There is an adequate number of staff to implement student IEPs with fidelity.	31.8	62.3	5	0.8	980
Staff in my building are provided adequate time/coverage to develop IEPs.	36.3	38.6	22.2	2.9	981
I understand what is documented within students' IEPs.	88.9	7.4	1.2	2.6	979
I am confident in how to implement IEPs as written.	82	11.1	1.4	5.5	982
Special education teachers at my school are used effectively to support the needs of students with IEPs.	68.2	26	4.6	1.2	982
General education teachers are provided adequate training in effectively supporting the needs of students with IEPs.	37.3	48.8	11.1	2.8	984
Paraprofessionals at my school(s) are used effectively to support the needs of students with IEPs.	66	25.8	6.6	1.5	983
Related Service providers (OT, PT, Speech Therapists) at my school are used effectively to support the needs of students with IEPs.	76.5	9.9	12.2	1.3	980
The special education/related services, accommodations, and/or modifications identified in students' IEPs are provided as written.	77.2	14.3	7.1	1.3	980
School administrators have high expectations for students with disabilities.	81.5	7.9	9.6	1	978
The special education teaching staff have high expectations for students with disabilities.	86.4	7.8	4.9	0.9	982

The general education teaching staff have high expectations for students with disabilities.	78.1	12.7	7.4	1.8	979
Related service providers have high expectations for students with disabilities.	81.3	3.7	12.9	2.1	975
Related service providers can meet the service times of all students on their caseloads.	38.5	36.8	22.6	2	981
FCPS has established standards for delivering co-teaching/collaborative instruction.	40.2	36.4	21.8	1.5	980
Services for English Learner students with disabilities at my school(s) are meeting student needs.	45.6	24.2	25.7	4.5	979
There is a well-articulated approach in my school(s) to address the behavior needs of students with disabilities.	45	47.2	7.2	0.6	975
Students with IEPs have adequate services in place to manage challenging behavior in the classroom.	41.3	51.6	6.2	0.8	978
The special education program/services at my school(s) are of high quality.	73.1	20.4	5.9	0.5	978

Do you support post-secondary transition activities and/or the development of transition IEP goals?

Value	Percent
Yes	46.8%
No	53.2%

Planning effective services and activities for postsecondary transition begins for students at age 14 at my school(s).

Value	Percent
Yes	70.7%
No	29.3%

Please indicate your level of agreement with the following statements.

	Agree	Disagree	Don't Know	N/A	Responses
Staff in my building(s) have an effective process by which they collaborate with each other regarding the needs of students with disabilities.	61.4	32.6	5.2	0.8	950
General and special education teachers have collaborative planning time to prepare effective instruction for students with IEPs.	34.7	51.9	11.4	2	949
There is sufficient communication between general and special educators about the needs and progress of students with IEPs.	48.4	39	11	1.7	949
There is sufficient communication between special educators and paraprofessionals about the needs and progress of students with IEPs.	54.3	27.8	16.3	1.6	952

My school(s) effectively responds to the needs and concerns of families of students with IEPs.	82.2	7.5	9.7	0.6	950
I have been provided adequate training in communicating with parents of students with disabilities.	58.1	32.4	1.4	8.1	951
Parents have been provided adequate training to support students with IEPs at home.	28	30.7	39.1	2.2	952
The central special education office effectively responds to the needs and concerns of families of students with IEPs.	31.3	24.4	42.4	1.9	951
There is effective and consistent communication between my building(s) and the central special education office.	29.8	27.1	41.1	2	949

Professional development offerings I have attended enable me to better support the teaching/learning of students with IEPs.

Value	Percent
Strongly Agree	8.4%
Agree	45.8%
Disagree	25.5%
Strongly Disagree	9.2%
Don't Know	2.3%
N/A	8.8%

I would like to attend professional development on the following topics:

	Yes	No	Responses

Differentiated Instruction	53.0%	47.0%	808
Increasingly intensive reading interventions	41.9%	58.1%	807
Increasingly intensive math interventions	40.4%	59.6%	800
Positive behavior intervention and supports	70.6%	29.4%	847
Response to Intervention (RtI) or Multi-Tiered System of Supports (MTSS)	56.8%	43.2%	813
Facilitating inclusion in general education	52.7%	47.3%	810
Developing functional behavior assessments (FBAs)	41.0%	59.0%	797
Developing behavior intervention plans (BIPs)	44.4%	55.6%	809
Teaching students with curriculum aligned with alternate assessments	44.2%	55.8%	804
Specific disability information (e.g., autism, emotional disability, etc.)	63.2%	36.8%	842
Independent living skills	23.4%	76.6%	783
Assistive technology	46.6%	53.4%	798
Collaborating with Paraprofessionals	49.7%	50.3%	811
Federal, state, and division special education regulations	37.4%	62.6%	803
Postsecondary transition planning	19.6%	80.4%	786
Using/analyzing data to inform instruction	41.0%	59.0%	797
Universal Design for Learning (UDL)	32.8%	67.2%	783

Parent Survey Results

Did FCPS staff clearly explain to you why your child needed special education services?

Value	Percent
Yes	73.2%
No	10.3%
Don't Know	3.0%
Not Applicable, my child had an IEP at a prior district	13.5%

At your child's most recent IEP meeting, did the team discuss receiving special education services in the general education class?

Value	Percent
Yes	65.5%
No	22.5%
Don't Know	12.0%

My input is considered during IEP meetings.

Value	Percent
Yes	83.6%
No	8.3%
Not applicable, I didn't attend an IEP meeting.	8.1%

I feel comfortable asking questions at IEP meetings.

Value	Percent

Yes	84.4%
No	8.3%
Not applicable, I didn't attend the IEP meeting	7.2%

Does FCPS offer opportunities for parent training or information sessions about special education?

Value	Percent
Yes	31.7%
No	24.3%
Don't Know	44.0%

Have you attended parent trainings or information sessions about special education offered by FCPS in the past year?

Value	Percent
Yes	6.3%
No	93.7%

Was the parent training you attended helpful?

Value	Percent
Yes	8.9%
No	11.5%
Don't Know	79.6%

How did you hear about the training?

Value	Percent
Child's Teacher	18.7%
Newsletter	14.2%
Social Media	5.4%
Website	6.0%
Other (Please indicate in text box)	55.7%

	Agree	Disagree	Don't know	Responses
The IEP team developed individualized goals related to postsecondary education, employment, independent living, and community participation for my child.	58.1	29.1	12.8	117
The IEP team identified transition services (for example, community service, independent living skills, etc.) to help my child.	48.3	31.9	19.8	116
My child's transition plan is preparing them for life after high school.	44.9	30.5	24.6	118

Were you asked if you would like to have an interpreter in IEP meetings?

Value	Percent
Yes	76.5%
No	23.5%

Was an interpreter provided at IEP meetings?

Value	Percent

Yes	66.7%
No, and I needed an interpreter	5.6%
No, I did not require an interpreter	27.8%

Did the interpretation provided at the IEP meetings help you understand the information discussed?

Value	Percent
Yes	72.2%
No, I did not require an interpreter	27.8%

Did you receive an IEP document that was translated in the language you speak at home?

Value	Percent
Yes	66.7%
No	33.3%

	Agree	Disagree	Don't know	N/A	Responses
My child's IEP tells how progress towards goals will be measured.	76.8	12.1	2.4	8.7	414
I receive reports on my child's progress towards meeting his/her IEP goals.	69.4	19.9	1.7	9	412
My child is getting the amount and type of services that are listed in his/her IEP.	64.9	21.5	5.8	7.7	413
Teachers communicate regularly with me regarding my child's progress.	59	36.4	0.5	4.1	415

Teachers respond to my concerns within a reasonable time.	78.8	14.9	0.7	5.5	415
I have a good working relationship with my child's teachers.	77.4	16.7	2.4	3.4	412
General education and special education teachers work together to assure that my child's IEP is being implemented.	59.8	17.4	11.1	11.6	413
My child's special education teacher(s) have high expectations for my child.	59.4	14	13.5	13	414
My child's general education teacher(s) have high expectations for my child.	65.1	13.8	12.6	8.5	413
My child is a valued member of the school and is generally included in all academic and extracurricular activities.	73.1	13.6	8.5	4.9	412
My child feels safe at school.	77.7	15	4.9	2.4	412
The principal sets a positive and welcoming tone in the school.	71.9	14.8	11.1	2.2	413
The principal does everything possible to support appropriate special education services in the school.	56.4	17.5	23.6	2.4	411
There is an adequate number of staff to implement my child's IEP with consistency.	52.1	27.3	14.4	6.3	411
I am satisfied with my child's overall special education services.	63.5	27.7	4.1	4.6	411

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Solutions that Matter