South Hunterdon Regional School District

Comprehensive Special Education Review

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South Hunterdon Regional School District
Special Education Review
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I. INTRODUCTION AND METHODOLOGY

Purpose of the Study

In August 2022, South Hunterdon Regional School District (SHRSD) 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 SHRSD and is designed to guide the District toward continuous improvement.

The study examined the following guiding questions:

- Are students being identified appropriately, referrals for evaluation to determine eligibility made in a timely manner, and progress monitoring efforts prior to the referral to determine eligibility implemented with fidelity?
- From an equity perspective to what extent are referrals and subsequent eligibility determinations representative of the district demographics?
- To what extent are students who are learning English as a second language being identified appropriately, and receiving necessary supports in comparison to the remainder of the student body?
- To what extent are students receiving special education services obtaining educational benefit from the programs and continuum of services provided, and what additional programming needs exist?
- Does the Individualized Education Program (IEP) address the individual needs of the student and appropriately detail special education and related services relevant to student needs?
- To what extent are varying instructional models implemented throughout SHRSD and their impact on student outcomes?
- Are the processes used by special education and related services effective, efficient, and adhered to with fidelity?
- How are IEP team members maintaining updating and/or revising student information in the special education data system?
- Are allocated resources utilized effectively and efficiently to meet the needs of the special education population?
- To what extent is communication with stakeholders both within and outside the system effective in meeting the needs of students requiring special education?
- To what extent are parents of students with disabilities engaged in the district's special education efforts and how do their perceptions influence engagement?

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 SHRSD. 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 and Student File Review Focus Groups, 4) a Staff Survey and a Parent Survey, 5) Classroom Observations, and 6) Peer District Interviews.** 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 SHRSD statistics against local district, state, and national data. The method and sources of data are triangulated to increase the validity of the conclusions, in this case, regarding program implementation, identification of gaps, and recommendations for the continued improvement of SHRSD's special education programs and continuum of services.

Details of each data source are included below.

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.

Document Review

PCG analyzed over 35 documents for information related to District and school structures, programs, policies, and practices. The documents were coded for themes that aligned to the focus group and interview findings. Documents reviewed were in the following general categories:

- Organizational structure, staffing, and resource allocation
- Description of programs, services, interventions, and activities
- Documents regarding instruction and professional development
- District procedures and guides
- Fiscal information

Focus Groups

In September 2022, PCG conducted two sets of in focus groups: 1) organizational focus groups/interviews (in-person) and 2) student file review focus groups (virtual). Narrative data from the organizational focus groups and interviews were analyzed using qualitative data analysis methods. Specifically, a two-cycle coding methodology was implemented to identify "themes" and "sub-themes" from the data. Additionally, the file review focus group narrative was analyzed to identify strengths and areas of improvement within SHRSD's current practices for IEP development and implementation. Within this report, no focus group or interview participants are personally referred to or quoted directly, although position titles are referenced in some cases, when necessary, for contextual reasons. These data were coded for themes.

Organizational Focus Groups and Interviews

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

Focus groups generally consisted of 4-10 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 15 focus groups and interviews, with over 50 stakeholders participating.

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 by PCG and included a wide cross-section of schools, ages, gender, and disability categories. SHRSD staff provided access to the relevant documents associated with the selected students, including the most recent evaluation, IEP, and progress report, and provided copies for discussion via the district's internal data sharing system. Several student records were discussed during each focus group session.

Participants included special education teachers, and Child Study Team (CST) members. Each group consisted of approximately three to six participants. To ensure adequate participation in each group, the Director of Pupil Services worked with the school-based leadership to select special education staff for participation. Focus groups were held during the school day. In total, PCG held two student file review focus groups.

Staff and Parent Surveys

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

Survey Items

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

The Department of Special Services (DSS) reviewed the survey items to verify their relevance and to 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

PCG worked collaboratively with the DSS 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 via email. Reminder emails were sent to parents. The survey was translated into Spanish. All staff were sent an email initiation to participate in the survey and were sent reminder emails to participate.

A total of 43 parents who received the online survey completed it. A total of 108 staff responded to the online staff survey.

Survey Analysis

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

Classroom Observations

In September 2022, PCG conducted classroom observations in all three SHRSD schools, visiting approximately 3-5 classrooms at each campus. 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 used a combination of random and purposeful sampling to assure that there was an overall representation of classrooms across the District.[1]

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. On average 3-5 classrooms were observed during each school visit. PCG observed all instructional/service delivery settings (e.g., co-taught classes, pull out support, 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 classroom visits are categorized and aggregated to inform impressions of the special education district-wide system and indicate areas in which professional development in special education practices may be considered. Using aggregated data across classroom level and type adheres to the agreement to not identify specific schools or staff. Furthermore, these data are used primarily as another set of data for overall triangulation.

Study Limitations

The study had the following limitations:

1. The circumstances presented by the COVID-19 pandemic over the past three school years have inevitably influenced instruction. Teachers' set of instructional tools and approaches are affected as students are not being educated during pre-pandemic school years. This must be recognized as having some influence on the overall school experience and on the discussion of current special education practices.
2. Data collection for this report was conducted during the 2022-23 school year. This report represents a specific point in time.

PCG Foundational Approach

PCG's approach to its work with state, county, and district organizations is as a thought partner. That is, we act as an outside agent, with an objective perspective, who works alongside educational entities to identify challenges and provide recommendations for improvement.[2] We follow a mixed method Collaborative Program Evaluation model that is systematic, based upon qualitative and quantitative research methods, and produces credible and valid data that proactively informs program implementation, determines gaps, and offers recommendations for the continued improvement of the program. We value the importance of developing trust, open communication, and fostering collaboration between the review team and program staff.

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

[3]Results Driven Accountability

The Individuals with Disabilities Education Act (IDEA) is a federal law that makes available a free appropriate public education (FAPE) to eligible children with disabilities throughout the nation and ensures special education and related services to those children. The IDEA governs how states and public agencies provide early intervention, special education, and related services to more than 6.5 million eligible infants, toddlers, children, and youth with disabilities and requires that each public school

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[1] This is often characterized as Heterogeneity Samples or Maximum Variation Samples.
[2] https://www.publicconsultinggroup.com/media/1272/pcg_collaborative_evaluation.pdf
[3] Supreme Court of the United States. Retrieved from https://www.supremecourt.gov/opinions/16pdf/15-827_0pm1.pdf

provide services to eligible students in the least restrictive environment (LRE) and in accordance with each student's IEP.

In the law, Congress states:

> *Disability is a natural part of the human experience and in no way diminishes the right of individuals to participate in or contribute to society. Improving educational results for children with disabilities is an essential element of our national policy of ensuring equality of opportunity, full participation, independent living, and economic self-sufficiency for individuals with disabilities.*[4]

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

While compliance indicators remain important, under the RDA framework, OSEP has sharpened its focus on what happens in the classroom to promote educational benefits and improve outcomes and results for students with disabilities. This change was based on data showing that the educational outcomes of America's children and youth with disabilities have not improved as expected, despite significant federal efforts to close achievement gaps. The accountability system that existed prior to the new one placed substantial emphasis on procedural compliance, but it often did not consider how requirements affected the learning outcomes of students.[5] This shift is having a great impact in guiding the priorities of special education departments nationwide, including in AISD. Districts nationwide need to raise the level of and access to rigor in the classroom and generate a culture of academic optimism.[6]

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

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[4] https://sites.ed.gov/idea/about-idea/
[5] April 5, 2012, RDA Summary, U.S. Department of Education. www2.ed.gov/about/offices/list/osers/osep/rdasummary.doc
[6] Hoy, W. K., Tarter, C. J., & Woolfolk Hoy, A. (2006). Academic optimism of schools: A force for student achievement. Working Paper. The Ohio State University. http://www.waynekhoy.com/school-academic-optimism/

Special Education Effectiveness Domains
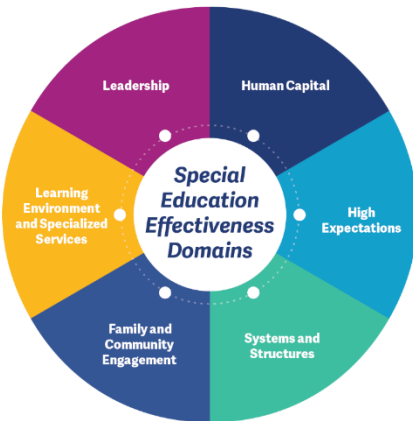
Building on extensive research and our collective experience and expertise serving school districts and state departments of education nationwide, PCG has developed this Special Education Effectiveness Framework to assist school districts in catalyzing conversations about, and reviewing and improving the quality of, their special education programs.[7] 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 recommendations provided in this report are organized around these domains and are oriented toward extending AISD's focus on outcomes for students with disabilities.

Terminology

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

Child Study Team. The Child Study Team (CST) is a multidisciplinary education team that is responsible to locate, identify, evaluate, determine eligibility, and develop an Individualized Education Program (IEP) for students suspected of having educational disabilities. This term, specific to New Jersey, includes a school psychologist, a learning disabilities teacher consultant (LDTC), and a school social worker, all of whom must be appropriately certified by the New Jersey Department of Education.

Gender Data. Current data collection at the SHRSD 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.

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.

Paraprofessional. The terms special education paraprofessional, classroom teaching assistant, and paraprofessional are used throughout the report to describe aides who support the academic and/or behavioral needs of students with disabilities. These terms are interchangeable.

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

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

(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

South Hunterdon Regional School District (SHRSD) is a public-school district located in western New Jersey. In the 2020-2021 school year, it served approximately 872 students in pre-kindergarten through twelfth grade.[8] Relatively small in square miles, the South Hunterdon community has a population of approximately 7,540 residents.[9] SHRSD has three schools in its district: South Hunterdon Regional High School (grades 7-12); Lambertville Public School (grades PK-6); and West Amwell Township School (grades KG-6). In the 2020-21 school year, approximately 18.3% of SHRSD' students were classified with a disability and have an Individualized Education Program (IEP).[10] This is slightly higher than the 2020-21 state average of 17.4%.[11]

In 2021-22, of the total students enrolled in SHRSD, 70.8% were white, 20.1% were Hispanic, and 5.5% were Black or African American. Of the students with IEPs, 58.0% were white, 31.8% were Hispanic, and 5.7% were Black or African American.[12]

In addition, of the entire student population in SHRSD, 16.9% are considered Economically Disadvantaged Students and 8.7% are considered English Learners.[13] This differs from the state averages, where over 32% students are considered Economically Disadvantaged Students and 7.5% are English Learners.[14]

Exhibit 1. SHRSD Student Demographics

	Number of Students	Percentage of Students with Disabilities	Percentage of English Learners	Percentage of Students Who Are Economically Disadvantaged	Student to Teacher Ratio
Lambertville PS (PK-6)	226	23.9%	19.5%	31.9%	7:1
West Amwell Township School (KG-6)	215	14.4%	6.0%	9.8%	7:1
South Hunterdon Regional HS (7-12)	431	17.3%	4.3%	12.6%	8:1

Fall 2022 Academic Performance of Students in SHRSD

In Fall 2022, SHRSD administered the Start Strong Assessment. The New Jersey Department of Education (NJDOE), pursuant to Commissioner's regulatory authority, required local education agencies (LEAs) to administer this assessment as part of a statewide initiative in response to the educational impacts of the COVID-19 pandemic.[15] The Start Strong assessments are "intentionally brief, designed to maximize instructional time, and quickly provide critical data to teachers and school leaders."[16] The memo issued by NJDOE in July 2022 highlighted key components of this tool:[17]

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[8] https://rc.doe.state.nj.us/2020-2021/district/detail/19/1376/overview?lang=EN&yc=t
[9] http://censusreporter.org/profiles/97000US3400769-south-hunterdon-regional-school-district-nj/
[10] https://rc.doe.state.nj.us/2020-2021/district/detail/19/1376/overview?lang=EN&yc=t
[11] https://rc.doe.state.nj.us/2020-2021/district/detail/19/1376/overview?lang=EN&yc=t
[12] District data provided by SHRSD in 2022
[13] https://rc.doe.state.nj.us/2020-2021/district/detail/19/1376/overview?lang=EN&yc=t
[14] https://rc.doe.state.nj.us/2020-2021/district/detail/19/1376/overview?lang=EN&yc=t
[15] https://www.nj.gov/education/broadcasts/2022/july/13/StartStrongFall2022AdministrationInformation.pdf
[16] https://www.nj.gov/education/broadcasts/2022/july/13/StartStrongFall2022AdministrationInformation.pdf
[17] https://www.nj.gov/education/broadcasts/2022/july/13/StartStrongFall2022AdministrationInformation.pdf

- Based on a subset of prioritized prior-year academic standards;
- Available in ELA grades 4-10, Mathematics grades 4-8, Algebra I, Geometry and Algebra II, and in Science grades 6,9, and 12;
- Can be administered in approximately 45-60 minutes
- Will provide immediate results to educators through the assessment platform; and
- Will include the same accessibly features and accommodations as the New Jersey Student Learning Assessments (NJSLA), including forms in Spanish and Text to Speech (TTS).

Assessments were administered to SHRSD students between September 19-30, 2022. Over 400 students participated in the ELA and Math assessments and 189 students participated in the Science assessment. Performance results are reported across three tiers: Less Support Needed (3), Some Support Needed (2), and Strong Support Needed (1). District leadership presented SHRSD's Start Strong Assessment results to the Board of Education in January 2023. The following results were shared:

Exhibit 2. SHRSD Start Strong Assessment District-wide Results, 2022
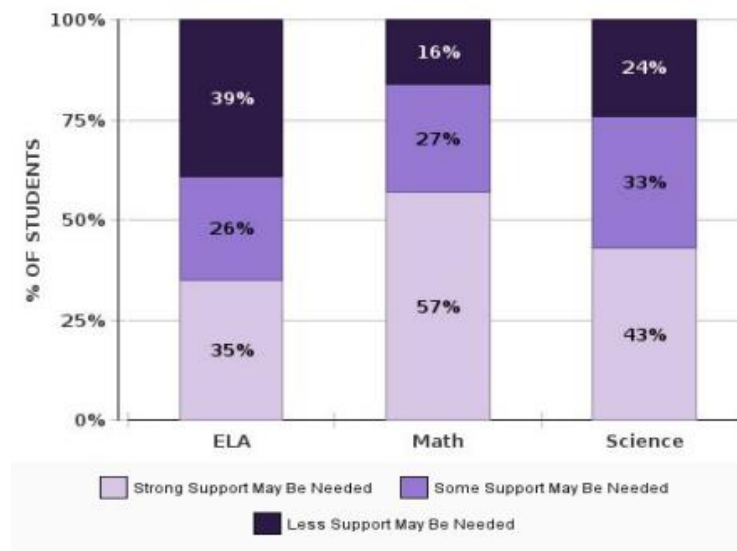
Exhibit 3. Lambertville Public School Start Strong Assessment Results, 2022
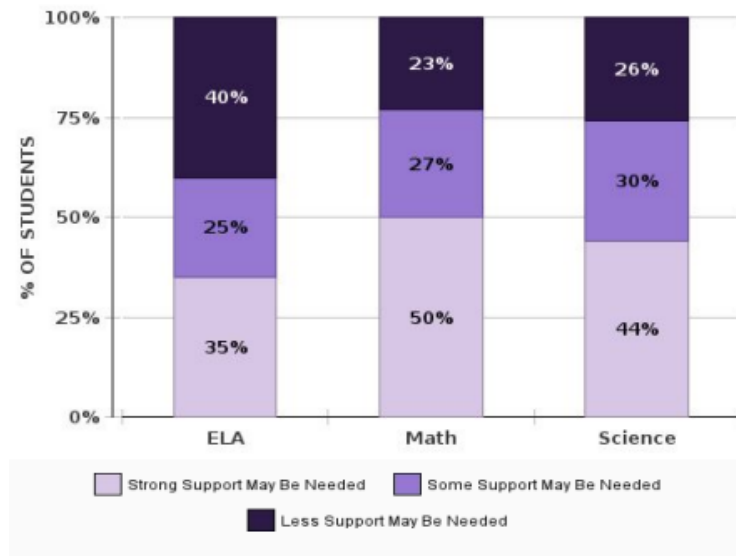
Exhibit 4. West Amwell Township Elementary School Start Strong Assessment Results, 2022
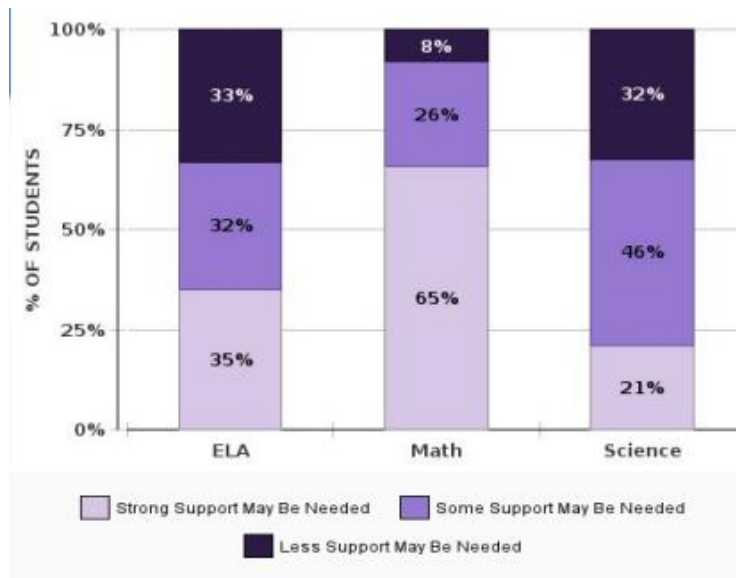
Exhibit 5. South Hunterdon Middle & High School Start Strong Assessment Results, 2022
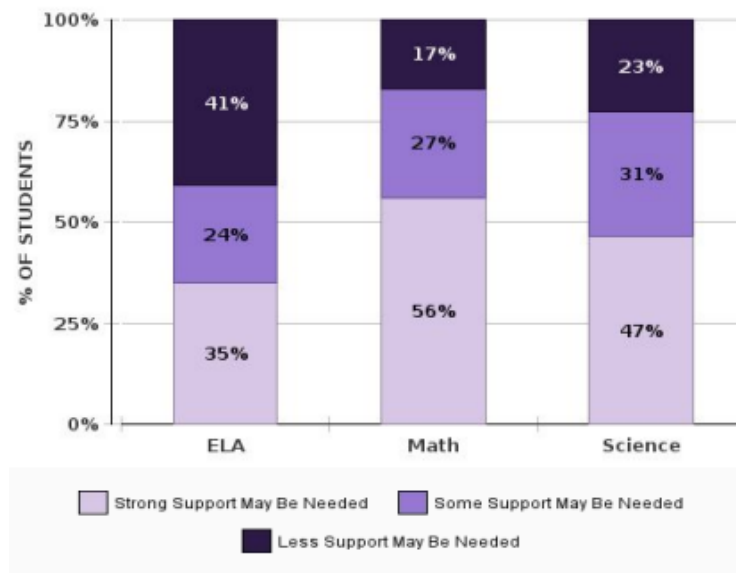
Overall, students in SHRSD demonstrated considerable need for support across ELA, Math, and Science. Performance results were disaggregated by socioeconomic status, ethnicity, and English Language Learner (ELL) status. Students identified in the report, presented by district leadership, as economically disadvantaged students scored within the "strong support may be needed" category in each subject area: ELA (58%), Math (78%), and Science (69%).[18] Comparatively, Black/African American and Hispanic/Latinx students scored lower than peers across all subject areas. Current ELL students demonstrated the greatest need for support: ELA (83%), Math (94%).[19] Performance for students with disabilities was not reported on during the Board of Education meeting.

District leadership has established both short- and long-term goals in response to the Start Strong assessment results. SHRSD prioritized continuing interventions, progress monitoring, and the utilization of Instructional Coaches. The district's long-term vision to promote student achievement following the COVID-19 pandemic includes hiring additional Instructional Coaches, expanding access to preschool, increasing professional development opportunities, and revising intervention processes to become more data driven and fluid.

Regionalizing the South Hunterdon School District

In 2014, South Hunterdon Regional School District was created out of regionalization efforts in Hunterdon County.[20] The West Amwell, Stockton, and Lambertville elementary school districts and South Hunterdon High School district voted in favor of dissolving individual oversight to unify forces in creating the South Hunterdon Regional School District.[21] This effort was several years in the making and required considerable community involvement. In 2014, it was reported that residents overwhelmingly approved of the regionalization plan.[22] However, there has been an increase within the community around the regionalization, with litigation and, in 2022, community discussion around West Amwell, NJ either fully or partially withdrawing from the regional district.[23] According to its website: "The South Hunterdon Regional

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[18] https://drive.google.com/file/d/1UGMqWw_FjRA9hSDbDLcNTgpG8FED8qvJ/view

[19] https://drive.google.com/file/d/1UGMqWw_FjRA9hSDbDLcNTgpG8FED8qvJ/view

[20] https://www.nj.com/education/2014/06/three_hunterdon_towns_create_regional_school_district.html

[21] https://www.nj.com/education/2014/06/three_hunterdon_towns_create_regional_school_district.html

[22] https://www.nj.com/education/2014/06/three_hunterdon_towns_create_regional_school_district.html

[23] https://www.tapinto.net/towns/flemington-slash-raritan/sections/education/articles/west-amwell-files-new-appeal-in-case-regarding-referendum-considers-withdrawing-from-regional-school-district

School District, a small, close-knit school district working in partnership with our community, provides dynamic and innovative educational experiences that challenge and empower each student to strive for personal excellence and positive global citizenship."[24]Through focus groups and interviews, teaching staff and administration reiterated the community focus of the district. The district prides itself on having a teaching staff that knows its students and families. In 2022, the district had the distinction of having one of its teachers be a New Jersey Governor's Educator of the Year.[25]

The district is engaging in a significant construction project made possible through a referendum which includes a new upper elementary and middle school building on the SHRHS campus in West Amwell, a renovation to Lambertville Public School and the closure of the West Amwell School.[26] There is significant anticipation around the completion of this project. According to information gathered from interviews, this comprehensive elementary and middle school will bring together staff, students, teachers, and resources under one roof – creating a new community and new opportunities to enhance programming for all students, including services for students with disabilities.

Preliminary Findings

Throughout the course of this report, we have analyzed the complex, often interconnected root causes that have limited the achievement of students with disabilities and highlighted areas in which the district either needs to accelerate its efforts or change course. Similar to the priorities identified in the Strong Start Assessment response set forth by district leadership, our focus has been grounded in increasing equity and access for students with disabilities in order to drive improvements in academic and functional outcomes.

Although SHRSD recognizes the need to strengthen systems to ensure student academic success, especially for students with disabilities, it faces challenges in five key areas. These areas are supported by evidence throughout this report and serve as the basis for the recommendations provided at the end of this report.

1) Increasing academic rigor and high expectations

While district staff self-report having a growth mindset towards inclusive practices, expectations for students with disabilities and rigor of instruction remain an area of growth for SHRSD. PCG staff observed supportive interactions between students and staff, well-organized rooms, and thoughtful touches, such as soft lighting and developmentally appropriate wall décor. Comparatively, there was limited differentiated instruction being implemented in co-taught classrooms during classroom visits. Students with disabilities in the resource setting were frequently observed to be working in small groups or in a 1:1 capacity with direct instructional support. Instructional structures to promote student achievement were present. Yet, students appeared to be over reliant on prompts, adult direction, and explicit instruction in both the in class and out of class resource settings.

These findings were consistent across several campuses and grade levels. Prioritizing high-quality specially designed instruction in the resource and general education settings is critical. That can be achieved through increasing academic rigor, diversifying instructional strategies, and promoting student independence. The absence of high expectations or rigor of instruction has resulted in generally poorer outcomes for students with disabilities in SHRSD when compared to their non-disabled peers.

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[24] https://www.shrsd.org/home
[25] https://twitter.com/SHRHSEagles/status/1484659541606379521?cxt=HHwWgsC93ZX_yJopAAAA
[26] https://www.tapinto.net/towns/flemington-slash-raritan/sections/education/articles/west-amwell-files-new-appeal-in-case-regarding-referendum-considers-withdrawing-from-regional-school-district

2) Implementing high-leverage special education and evidence-based practices with fidelity

SHRSD, as a district, meets the State Performance Plan (SPP) target for students with disabilities spending more than 80 percent of the time in a general education setting. However, students with disabilities continue to demonstrate considerably poorer outcomes when compared to their SHRSD peers without disabilities and the state averages for students with disabilities despite consistent access to instruction provided in the general education environment alongside non-disabled peers. Students with disabilities having a "seat" in the general education classroom is only one part of driving academic improvement.

When used together, high-leverage practices (HLPs) and evidence-based practices (EBPs) can be powerful tools for improving student outcomes. Special education teachers must be flexible problem solvers who not only have expertise in using highly effective practices, but also are proficient in understanding, implementing, and monitoring evidence-based practices with individual students and making decisions regarding changes in practice as needed. SHRSD has the opportunity to change the educational trajectory for students with disabilities by adopting and standardizing research-backed practices.

3) Expanding the LRE continuum and increasing service flexibility

Parents, SHRSD leadership, and staff all echoed the importance of students with disabilities remaining part of their homeschool community; however, the current dichotomy of in-class resource versus out of class resource program structure limits campuses' ability to serve the students in their building. SHRSD must consider how expanding more specialized classroom opportunities for students with more complex disabilities can be implemented to promote students remaining in their home schools and connected with their non-disabled peers. Presently, the district is incurring costs to fund out of district placements. Once a more expansive LRE continuum is created, SHRSD students will have an increased opportunity to remain in the district with siblings, neighborhood friends, and peers.

4) Creating a district-wide vision and guidance for special education

The experiences of students with disabilities and special education staff varies across campuses throughout SHRSD. Inconsistencies in practice and the lack of documented special education processes guidance has created confusion amongst campus-based teams. Special education instructional investment has occurred at the central office level. When reviewing special education instruction costs per student with disability on roll using data reported in the *New Jersey User Friendly Budgets*, SHRSD is highest out of eight districts reviewed in its special education instruction costs. However, the long-standing tenure of district staff and no formal policy guidance and special education vision has evolved into campus-based teams operating from a "historical" perspective as opposed to a unified approach to special education service provision. A goal of well-developed special education policies is to ensure that students with disabilities have comparable educational experiences regardless of campus enrollment.

5) Prioritizing a parent engagement strategy

Parents of students with disabilities in SHRSD have advocated for the establishment of collaborative and trusting relationships. It was reported during this review that while SHRSD has created a Special Education Parent Advisory Group (SEPAG) this school, as required by law, all parents are not aware of its existence. The ambiguity regarding the existence of this forum for parents of students with disabilities to connect with district leadership has left some parents feeling disconnected and disheartened. It can be perceived as parent engagement not being prioritized. Over 95% of parent survey respondents indicated they have not attended parent training or information sessions lead by district special education leadership. While most parent survey respondents indicated that their child is valued member of the school (82.9%), far fewer parents are satisfied with their child's overall special education services (63.4%). There are opportunities to increase parent engagement through prioritizing a parent engagement strategy as part of the district's vision for special education.

In summary, the investments made throughout the district to support the accelerated growth of all students, particularly students with disabilities, cannot be underscored. SHRSD staff at the campus and central office levels have weathered the COVID-19 pandemic and the significant effects it has had on student learning outcomes district-wide. The systems and initiatives instituted prior to and in response to the pandemic are struggling to be maintained. As SHRSD transitions into this new era of instruction, it is critical that systems change, and management evolve with greater accountability and consistency during implementation.

PCG believes that SHRSD has many strengths on which to build and can achieve high-quality programming for all students, especially those with disabilities, that we know it seeks. The Superintendent and SHRSD senior leadership have expressed commitment to making the changes necessary. The arrival of a seasoned and well-respected Director of Pupil Services is a catalyst for change in creating positive outcomes for students with disabilities. Initiating this kind of change requires attention, a strong vision from the Superintendent and Board of Education that is enacted by senior leadership staff, an appropriate allocation of resources, mandated professional learning, and clear, non-negotiable accountability measures. PCG strongly encourages SHRSD to develop a bold, creative, and transparent implementation plan to which it will hold itself accountable, and that is informed by input from a wide range of community stakeholders. Doing so will position SHRSD for its upward trajectory for years to come.

III. STATE PERFORMANCE PLAN (SPP) AND RESULTS DRIVEN ACCOUNTABILITY (RDA) RESULTS

Strengths	Opportunities
• SHRSD met Indicator 1 (% of youth with IEPs ages 14 through 21 who graduated from high school with a regular diploma in SY 2019-20) with 100% compliance. • 0% of youth with IEPs ages 14 through 21 dropped out of high school in the 2019-20 SY. • SHRSD was not identified by the New Jersey Department of Education as having significant discrepancies in the rate of suspensions and expulsions of students with IEPs across several indicators.	• SHRSD did not meet criterion for 3 of the seventeen State Performance Plan/Annual Performance Report (SPP/APR) indicators: School Age- LRE (Indicator 5), Effective Supervision of Part B (Indicator 11), and Postsecondary Transition Outcomes (Indicator 14). • Consistently higher trend of eligible students with IEPs in comparison with state and national percentages. • Exceeding risk ratio of White students being found eligible under the disability classification "Other Health Impairment." • Hispanic students were close to twice as likely to be identified with a specific learning disability.

School-Age Incidence Rates

Overall Incidence Rates

Between 2018-2021, the percentage of students ages 5-21 receiving special education services varied between a high of 19.7% in 2018-19 and a low of 18.3% in 2020-21.[27] Over these three years, the rates were within two percentage points of statewide averages.

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[27] District and State data obtained from NJ School Performance Report: https://rc.doe.state.nj.us/ https://rc.doe.state.nj.us/

Exhibit 6. Percentage of SHRSD Students with IEPs Compared to State Incidence Rates (Ages 5-21), 2018-19 to 2020-21
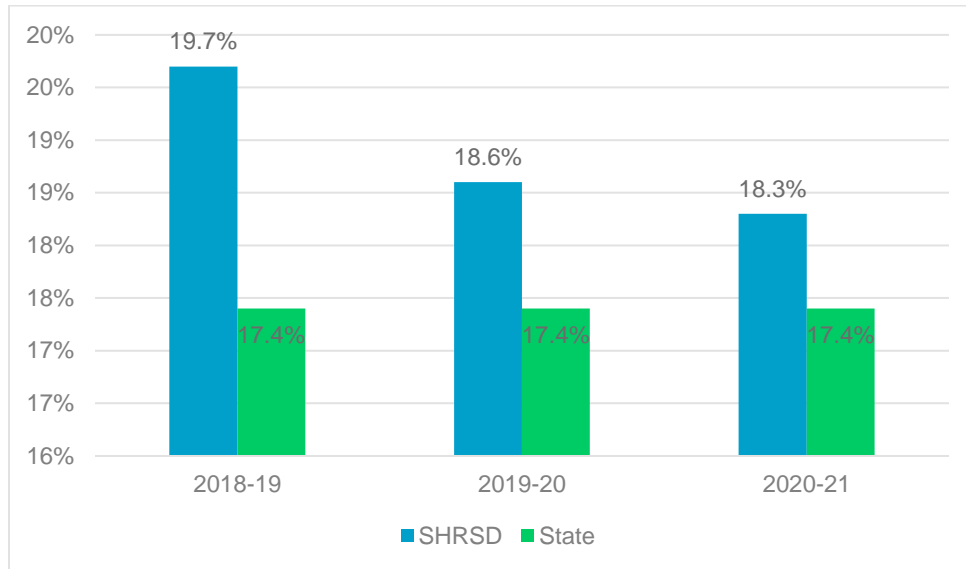
Incidence Rates by Primary Disability Area

In 2020-21, SHRSD's incidence rate for students with multiple disabilities (19.7%) was higher than the state (5.9%) and nation (1.8%). SHRSD's identification rate for students with a specific learning disability (47.6%) was higher than the state (31.8%) and nation (34.6%). SHRSD's rate for students with speech or language impairments (16.3) was slightly lower than the state (22.5%) and aligned with the national average (17.6).[28]

Exhibit 7. Percentage of SHRSD Students with IEPs by Disability Area Compared to State and Nation (ages 6-21), 2020-21

	All disabilities	Multiple Disabilities	Other Health Impairment	Specific Learning Disability	Speech or Language Impairments
SHRSD	18.3%	19.7%	16.3%	47.6%	16.3%
State	17.1%	5.9%	22.4%	31.8%	22.5%
Nation	13.4%	1.8%	16.3%	34.6%	17.6%
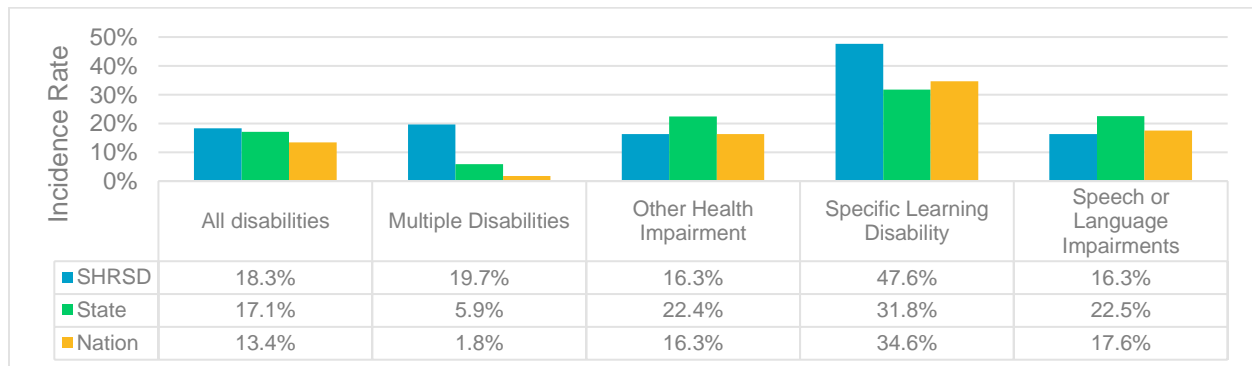
Incidence Rate by Race/Ethnicity

The following charts detail the incidence rates of students with IEPs in SHRSD by race/ethnicity.[29]

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[28] District data obtained from NJ Special Education Data: https://www.nj.gov/education/specialed/monitor/ideapublicdata/index.shtml. State/ Nation data retrieved from: https://www2.ed.gov/programs/osepidea/618-data/static-tables/index.html. Due to small n sizes, data for students with autism, intellectual disabilities, and emotional regulation impairments was suppressed.

[29] District data provided by SHRSD in 2022

In 2021-22, of the total students enrolled in SHRSD, 70.8% were white, 20.1% were Hispanic, and 5.5% were Black or African American. Of the students with IEPs, 58.0% were white, 31.8% were Hispanic, and 5.7% were Black or African American

Exhibit 8. Percent of SHRSD Students with IEPs (ages 5-21) Compared to Overall Student Enrollment by Race/Ethnicity, 2021-22[30]
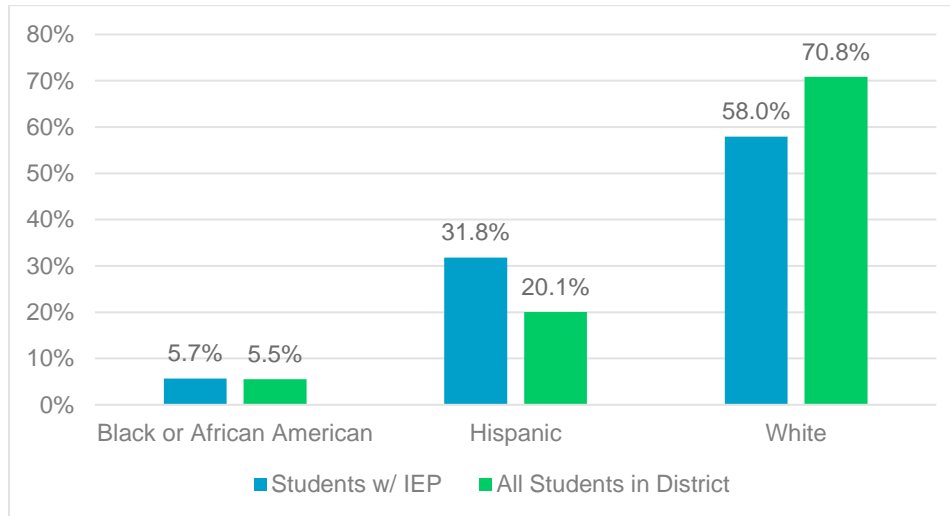
The exhibit below compares the percentage of students with and without IEPs within each race/ethnicity category. Of all white students, 16.3% had an IEP compared to 32.9% of Hispanic students, and 20.4% of Black or African American students.

Exhibit 9. Percent of SHRSD Students with and without IEPs (ages 5-21) by Race/Ethnicity, 2021-22[31]
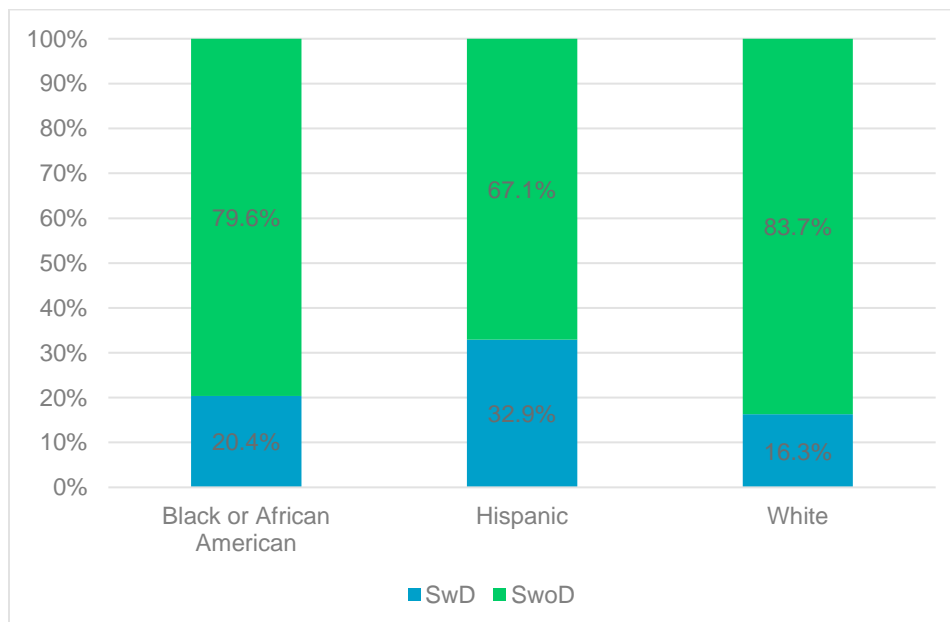
[30] Data for the following Race/Ethnicity categories were suppressed due to n<10: American Indian or Alaskan Native, Asian, Native Hawaiian or Pacific Islander, and Two or More Races
[31] *Id.*

Data indicated the prevalence of disability types for certain races/ethnicities higher than district demographics, with variations in disability categories.[32] Key differences, displayed in the graph below, include:

- White students accounted for 74.1% of students identified with an other health impairment and 69.2% of students with multiple disabilities. These percentages were higher than the overall percentage of white students with an IEP (58.0%).
- Hispanic students accounted for 45.6% of students identified with a specific learning disability and 37.5% of students with a speech or language impairment. These percentages were higher than the overall percentage of Hispanic students with an IEP (31.8%).

Exhibit 10. Percentage of SHRSD Students (Age 5-21) by Disability Area and Race/Ethnicity, 2019-20

	All Students	Multiple Disabilities	Other Health Impairment	Specific Learning Disability	Speech or Language Impairmentss
■ White	58.0%	69.2%	74.1%	45.6%	58.3%
■ Hispanic	31.8%	15.4%	14.8%	45.6%	37.5%
■ Black or African American	5.7%	7.7%	7.4%	3.8%	4.2%

Risk Ratio

One of the most useful, informative, and proactive methods used to calculate disproportionality "is the risk ratio, which compares one racial/ethnic group's risk of receiving special education and related services to that of all other students."[33] The risk ratio can be used to calculate disproportionality at both the state and district levels. The analysis below is intended to provide SHRSD with a tool to calculate risk ratios in order to monitor trends and identify areas of continued concern.

The risk ratio tool tells school personnel how the risk for one racial/ethnic group compares to the risk for a comparison group.[34] It can be used to assess:

- How much more likely is it for Hispanic students to be classified with a disability compared to all other students;
- How much more likely is it for Hispanic students with disabilities to be suspended for more than 10 days compared to all other students with disabilities;
- What the likelihood is that a student from a particular racial or ethnic group will be classified with a disability, be given a specific disability classification, or placed in a most restrictive environment;

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[32] Data for the following disability categories were suppressed due to n<10: Autism, Deaf, Emotional Regulation Impairment, Hearing Impairment, Intellectual Disability, Orthopedic Impairment, and Traumatic Brain Injury
[33] Bollmer, J. Bethel, et al. (2007). Using the Risk Ratio to Assess Racial/Ethnic Disproportionality in Special Education at the School-District Level. The Journal of Special Education, Vol 41, Issue 3, pp. 186 – 198.
[34] Racial and Ethnic Disparities in Special Education: A Multi-Year Disproportionality Analysis by State, Analysis Category, and Race/Ethnicity, Office of Special Education and Rehabilitative Services, U.S. Department of Education, February 2016.

- What the likelihood is that a student with a disability from a particular racial or ethnic group will be suspended for more than 10 days.

As a concept, "risk" looks at the general enrollment data for each racial group along with the number of students from that group who were identified for a specified category and calculates the likelihood that a student from that racial group would be found in that particular category. The general risk equation is as follows:

$$Risk = \frac{Number\ of\ children\ from\ racial/ethnic\ group\ in\ disability\ category}{Number\ of\ enrolled\ children\ from\ racial/ethnic\ group} \times 100$$

As shown below, a risk ratio greater than 2.0 or a racial/ethnic group indicates a higher risk of over-representation, while a risk ratio of less than 1.0 indicates a higher risk of under-representation. The threshold for identification of significant disproportionality is established by each state.

PCG conducted a risk ratio analysis of SHRSD data to identify areas where over-identification of students with disabilities based on disability, race, and discipline may be occurring. The risk ratio calculated is not designed to replicate New Jersey's significant disproportionality methodology. The intent of this calculation is to provide a formative data point to assess the extent to which identification rates and educational placement decisions are impacted by students' race/ethnicity. This tool can be used to inform ongoing analysis and monitoring.

As displayed in the exhibit below, White students were twice as likely to be identified with an other health impairment. Hispanic students were close to twice as likely to be identified with a specific learning disability. [35]

Exhibit 11. Risk Ratios by Race/Ethnicity and Disability, 2021-22[36]

	Hispanic	White
Other Health Impairment		2.07
Specific Learning Disability	1.79	0.61
Speech/ Language Impairment	1.29	1.02

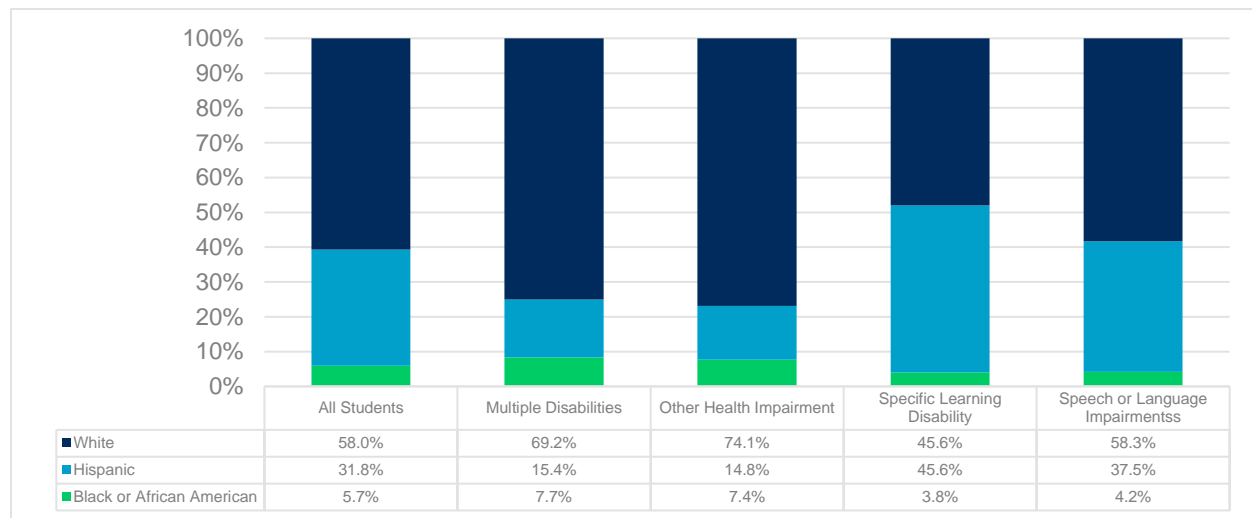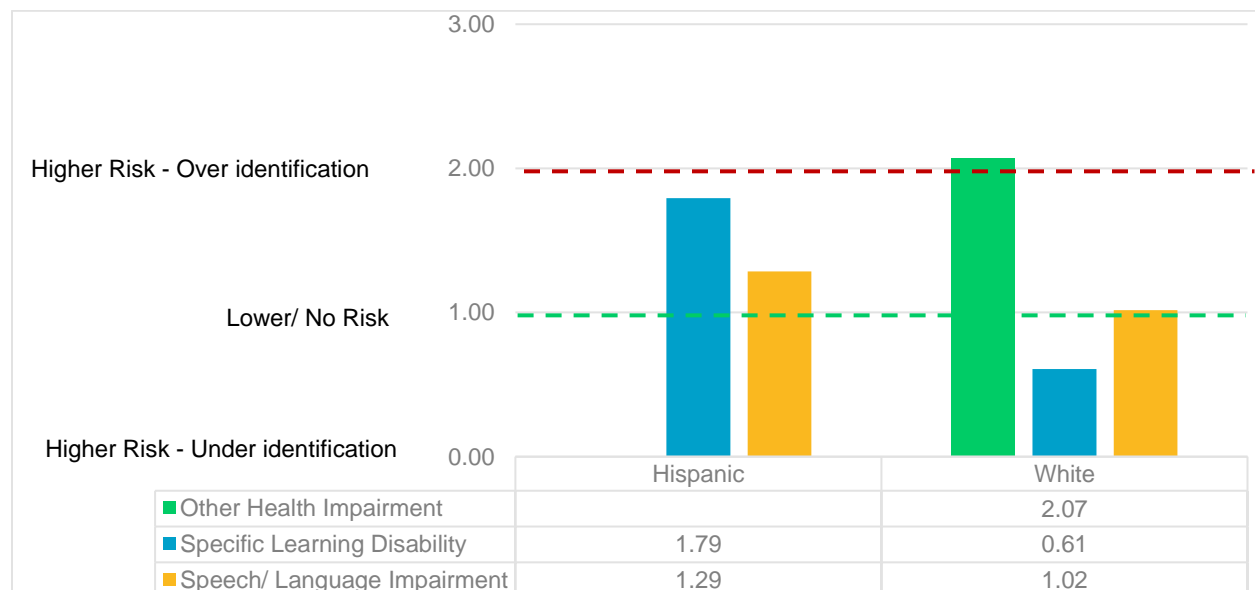[35] Data provided by SHRSD in 2022
[36] Data for the following race/ethnicity categories were suppressed due to small sample size: American Indian or Alaskan Native, Asian, Native Hawaiian or Pacific Islander, and Two or More Races. Data for the following race/ethnicity and disability category was suppressed due to n<5: Hispanic – other health impairment.

Incidence Rates by Gender

Overall, 59.7% of SHRSD students with IEPs were male, and 40.3% were female. When compared with national data, more female students in SHRSD have an IEP, while fewer male students have an IEP. Nationally, roughly two-thirds of students receiving special education services were male (65.8%), and one-third (34.2%) were female.[37]

Male students comprised the majority of students identified in all disability categories. The percentage of males identified in the following disability categories was higher than the overall IEP average for males (59.7%): multiple disabilities (73.1%) and speech/language impairment (62.5%). Female students with IEPs accounted for 46.8% of students with a specific learning disability which was higher than the percentage of female students with an IEP (40.3%).[38]

Exhibit 12. Percent of SHRSD Male vs. Female Students with IEPs (Age 5-21) by Disability, 2021-22
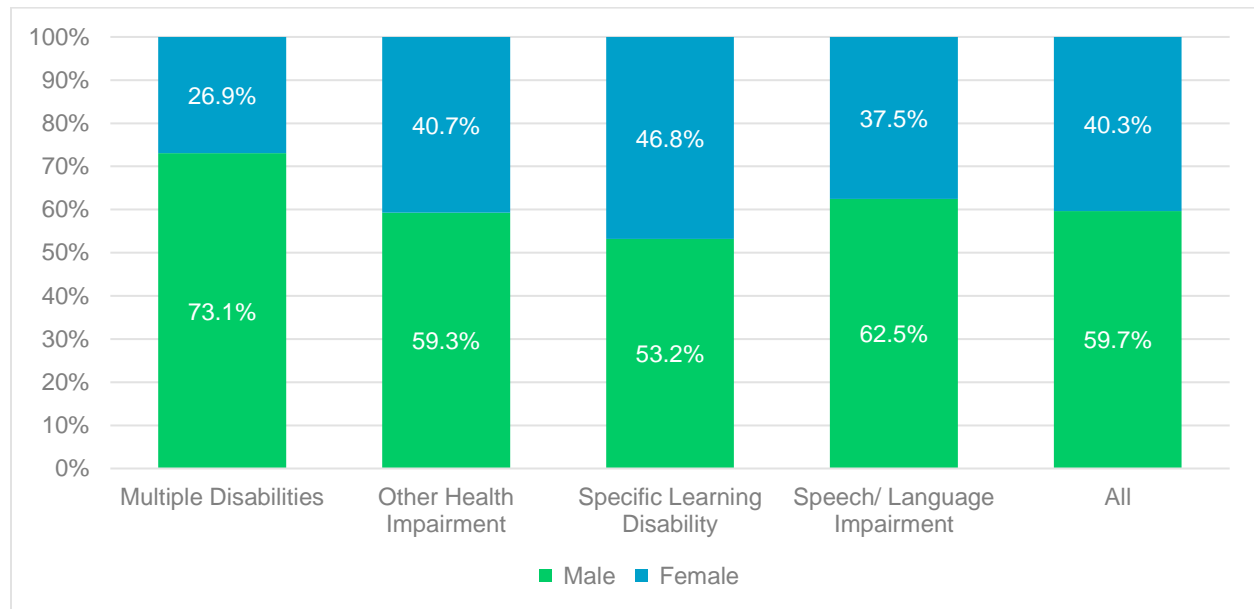
Incidence Rates by EL Status

In 2021-22, 8.3% of students in SHRSD were English learners. The percentage of students with IEPs who were also English learners was 17.0%.

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[37] Data Source - National Center for Education Statistics: https://nces.ed.gov/programs/digest/d21/tables/dt21_204.50.asp
[38] Data provided by SHRSD in 2022. Data for the following disability categories were suppressed due to n<10: Autism, Deaf, Emotional Regulation Impairment, Hearing Impairment, Intellectual Disability, Orthopedic Impairment, and Traumatic Brain Injury

Exhibit 13. Percent of Students with IEP (ages 5-21) by EL Status, 2019
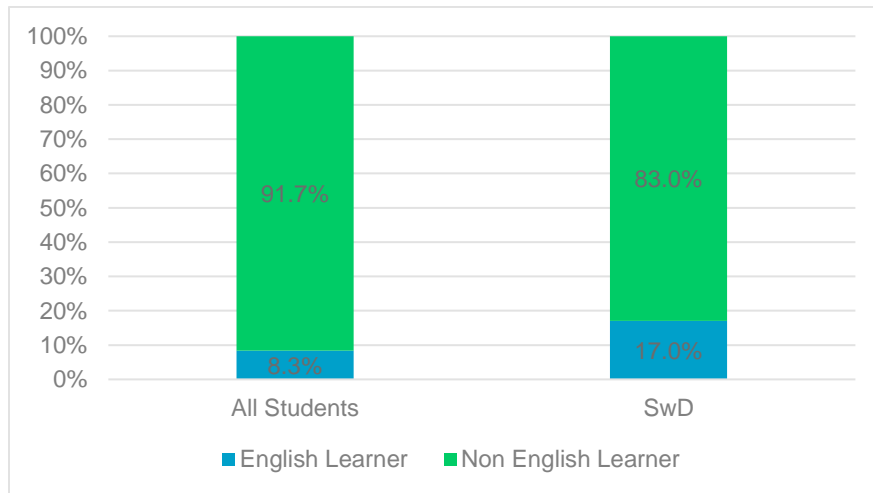
Education Environment Rates for School-age Students with Disabilities

The data in this section reflects the educational settings of SHRSD school-aged students overall, by disability areas and race/ethnicity.[39] In addition, District data are compared to state data.

Overall Educational Setting Data for SHRSD and State

In 2020-21, SHRSD students with disabilities were educated more frequently in an inclusive general education setting. Of all students with IEPs, 58.3% spent more than 80% or more in the general education classroom, 54.6% spent between 40-79% of their day in the general education classroom, and 11.1% of students were in a separate placement. Compared to state data, a larger percentage of SHRSD students spent 80% or more of their school day in the general education setting (58.3%) compared to the state (46.9%).

Exhibit 14. Percentage of SHRSD Students (Age 5-21) by Educational Setting Compared to State, 2020-21

	≥80%	40-79%	<40%	Separate
SHRSD	58.3%	54.6%	0.0%	11.1%
State	46.9%	30.2%	16.4%	6.5%
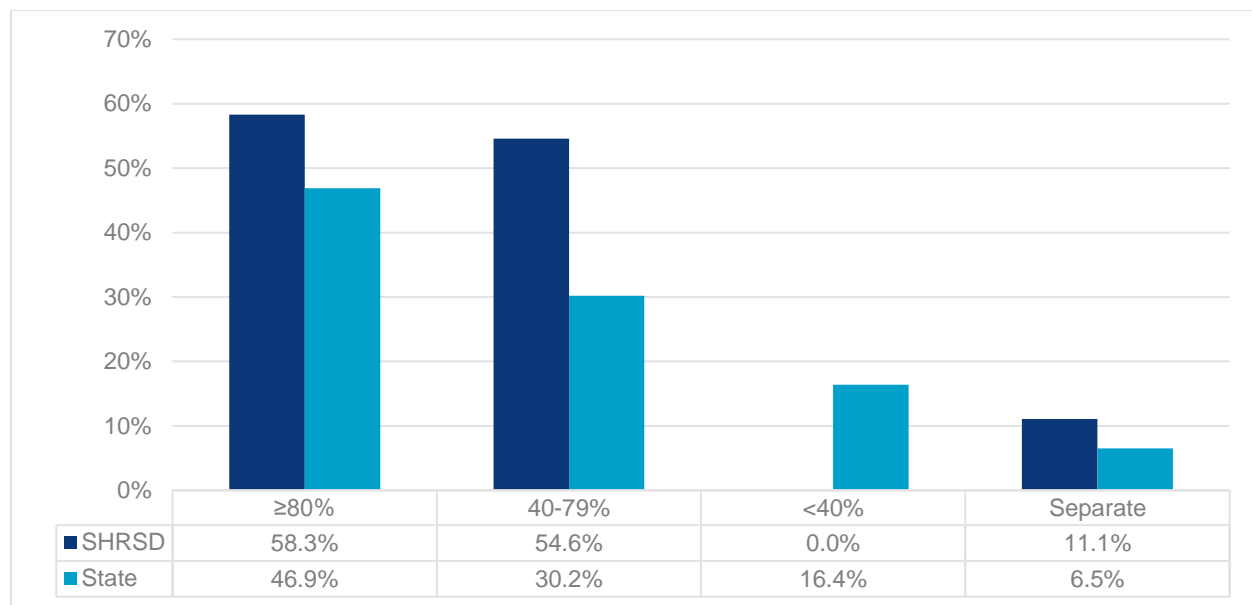
Educational Setting by Primary Disability Area

The charts below provide analysis of SHRSD students by primary disability area and education setting.[40] Comparison with state data is also included.

General Education Setting 80% or more of the time. Students with a speech or language impairment had the highest level of inclusion in this setting (100%).

General Education Setting 40-79%. A higher percentage of students with a specific learning disability (56.7%) were included in this setting compared to the overall district average (54.6%).

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[39] District and State data obtained from NJ Special Education Data Reports available at:
https://www.nj.gov/education/specialed/monitor/ideapublicdata/index.shtml
[40] NJ Jersey suppressed data for all other disability categories and educational settings.

Exhibit 15. Percentage of SHRSD Students (Age 6-21) by Disability Area and Educational Setting, 2019-20

	Other Health Impairment	Specific Learning Disability	Speech or Language Impairments	District Overall
■ Separate	0.0%	0.0%	0.0%	11.1%
■ <40%	0.0%	0.0%	0.0%	0.0%
■ 40-79%	50.0%	56.7%	0.0%	54.6%
■ ≥80%	50.0%	43.3%	100.0%	58.3%

■ ≥80% ■ 40-79% ■ <40% ■ Separate
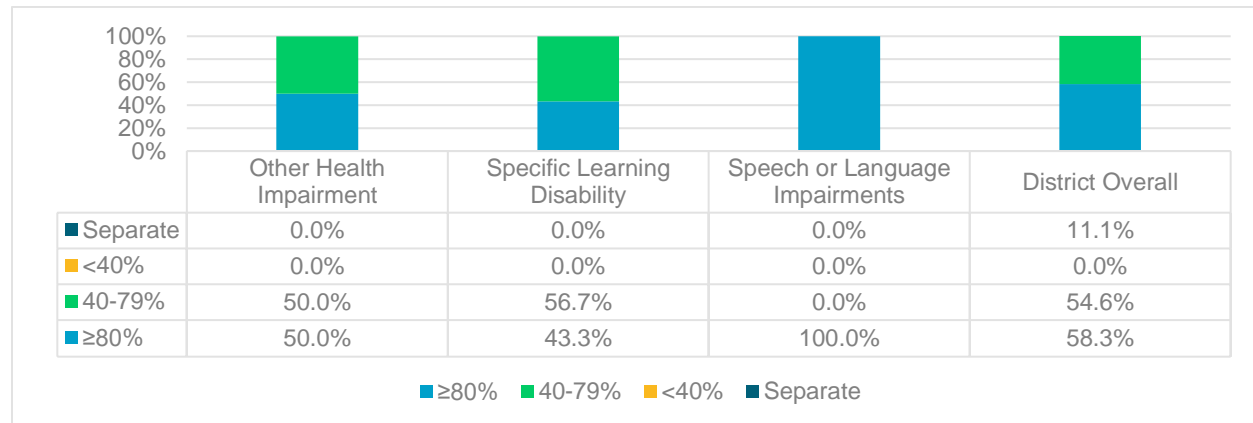
Other Health Impairments, Specific Learning Disability

The following comparative analysis was completed on the two most inclusive educational settings: ≥80% and 40-79% by disability category for SHRSD and the state.[41]

Other Health Impairments. SHRSD students with an other health impairment were educated at a higher rate in general education for more than 80% of the time (68.8%), compared to the state (52.2%).

Specific Learning Disability. Of SHRSD students with a specific learning disability, 48.3% spent 80% or more of their day in the general education setting compared to 52.2% of students in the state. A slightly larger percentage of SHRSD students with a specific learning disability spent 40-79% of their day in general education (44.1%) compared to the state (37.7%).

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[41] District data provided by SHRSD in 2020. State data obtained from NJ Special Education Data Reports available at: https://www.nj.gov/education/specialed/data/

Exhibit 16. Percentage of SHRSD Students (Age 5-21) with OHI and SLD by Educational Setting Compared to State, 2019-20

	Other Health Impairment		Specific Learning Disability	
	SHRSD	State	SHRSD	State
40-79%	31.2%	32.1%	44.1%	37.7%
≥80%	68.8%	52.2%	48.3%	52.2%
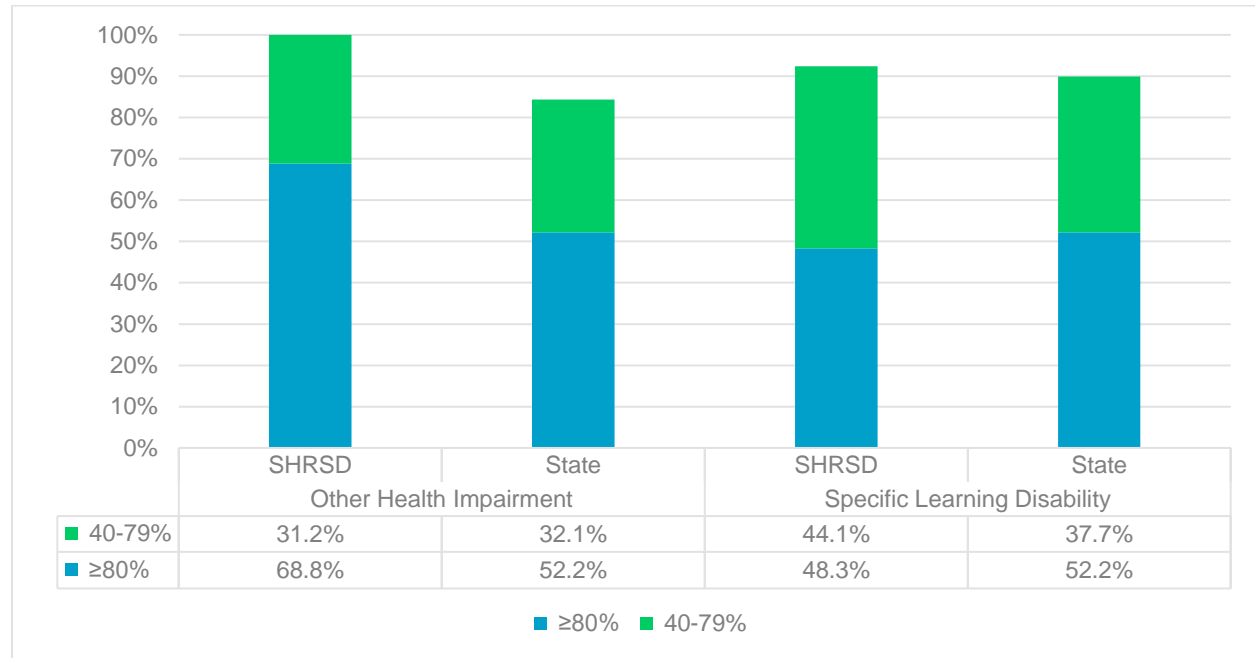
Educational Setting by Race/Ethnicity

In 2021-22, white students (49.4%) were educated in the general education setting more than 80 percent of their school day at a higher rate than Hispanic students (43.4%). Hispanic students (56.6%) were educated in the general education setting 40-79% of their school day at a higher rate than white students (35.8%).

	Hispanic	White
Separate	0.0%	14.8%
<40%	0.0%	0.0%
40-79%	56.6%	35.8%
≥80%	43.4%	49.4%
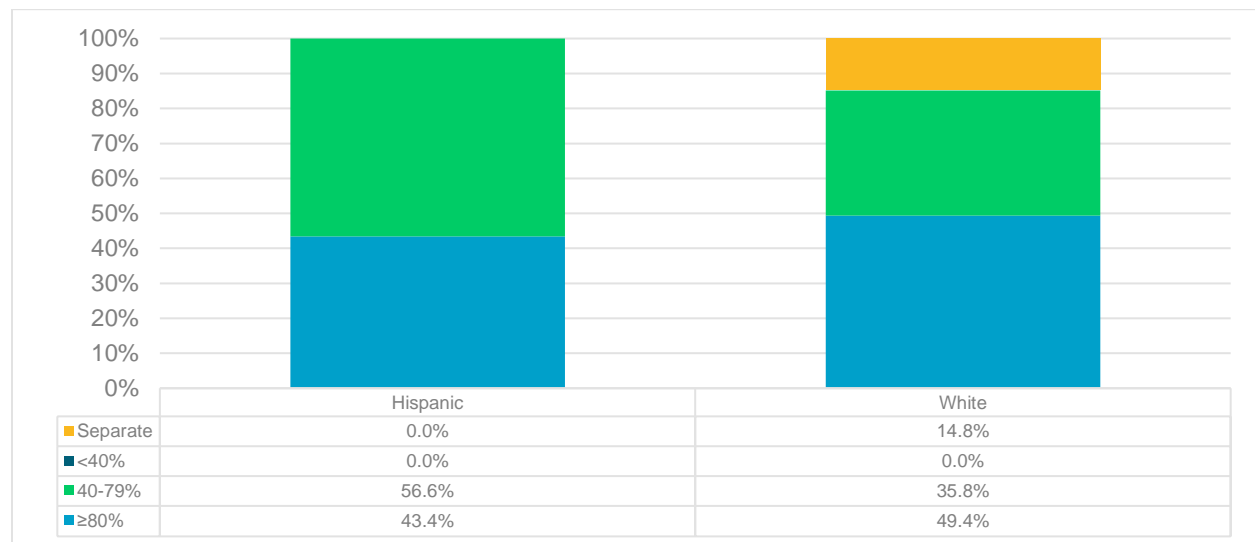
Achievement Outcomes

This section provides a longitudinal analysis of student outcomes on the New Jersey Student Learning Assessment (NJSLA) in English Language Arts/Literacy (ELA/Literacy) and in mathematics. The exhibits

compare the performance of students at SHRSD with state averages for all students and students with IEPs, documenting the achievement gap over time.[42]

English Language Arts/Literacy

Grade 3. Between 2017-18 to 2021-22, SHRSD students with IEPs performed substantially below the state average of students with disabilities. During this time, the percentage of SHRSD students with IEPs who met or exceeded expectations was 30 percentage points lower than the state average for students with disabilities. When compared to their non-disabled peers, the percentage of SHRSD students with IEPs who met or exceeded expectations was, on average, 25 percentage points lower.

Exhibit 17. Grade 3 ELA/Literacy, 2017-18 to 2021-22
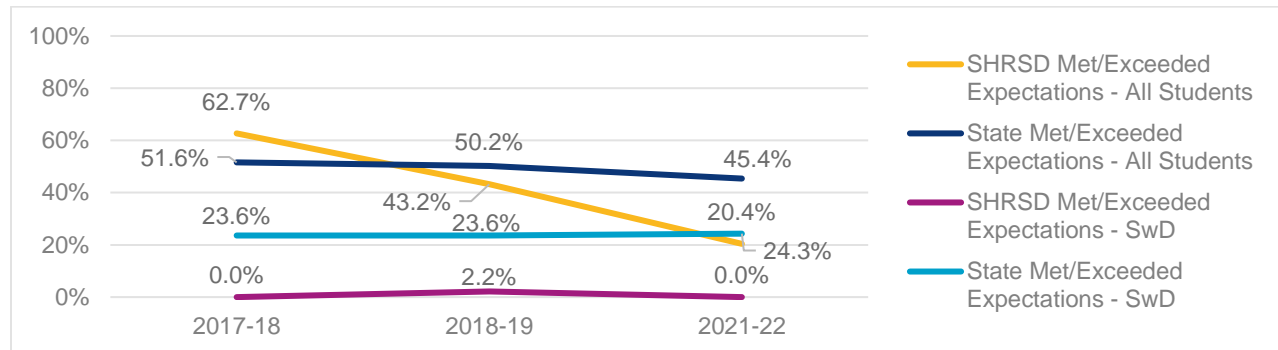
Grade 8. The percentage of SHRSD students with IEPs who met or exceeded expectations on the grade 8 ELA/literacy assessment was above the overall state rate for students with disabilities for 2017-18 and 2018-19. In 2021-22, the percentage of SHRSD students with IEPs who met or exceeded expectations was 7.3 percentage points lower than the state average. When compared to their non-disabled peers, SHRSD students with IEPs who met or exceed expectations on the grade 8 ELA/literacy assessment was significantly lower. The three-year average achievement gap between SHRSD students with IEPs and non-disabled students was 38 percentage points.

Exhibit 18. Grade 8 ELA/Literacy, 2017-18 to 2021-22
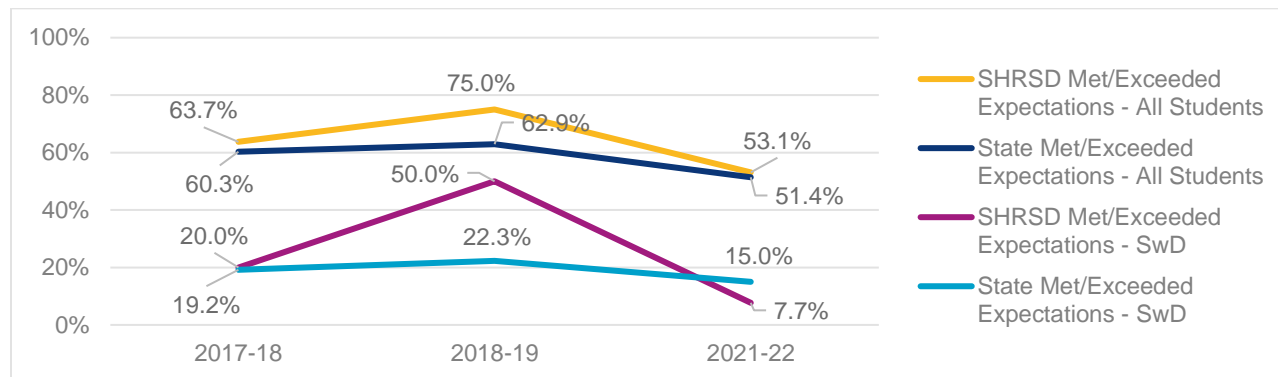
Grade 9. The percentage of SHRSD students with IEPs who met or exceeded expectations on the grade 9 ELA/Literacy assessment was aligned with the state average for all students with disabilities for 2017-18 and 2018-19 and nine percentage points higher than the state average for 2021-2022. Similar to other grade levels, when compared to their non-disabled peers, a substantially smaller percentage of students

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[42]NJSLA scores obtained from NJ School Performance Report: https://rc.doe.state.nj.us/. PCG looked at the percentage of testers who met/exceeded expectations for students who took the specific grade level learning assessment. State assessments were cancelled for 2019-20 and 2020-21 school years.

with IEPs met or exceeded expectations on the grade 10 reading assessment. The three-year average achievement gap between SHRSD students with disabilities and those without disabilities was 41 percentage points.

Exhibit 19. Grade 9 ELA/Literacy, 2017-18 to 2021-22

Mathematics

Grade 3. The percentage of SHRSD students with IEPs who met or exceeded expectations on the grade 3 mathematics assessment was substantially below the state average for students with disabilities. However, between 2018-19 and 2021-22 the percentage of students with IEPs who met or exceeded expectations increased ten percentage points. Compared to their non-disabled peers, a smaller percentage of SHRSD students with IEPs met or exceeded expectations. The three-year average achievement gap between SHRSD students with disabilities and those without disabilities was 43 percentage points.

Exhibit 20. Grade 3 Mathematics, 2017-18 to 2021-22
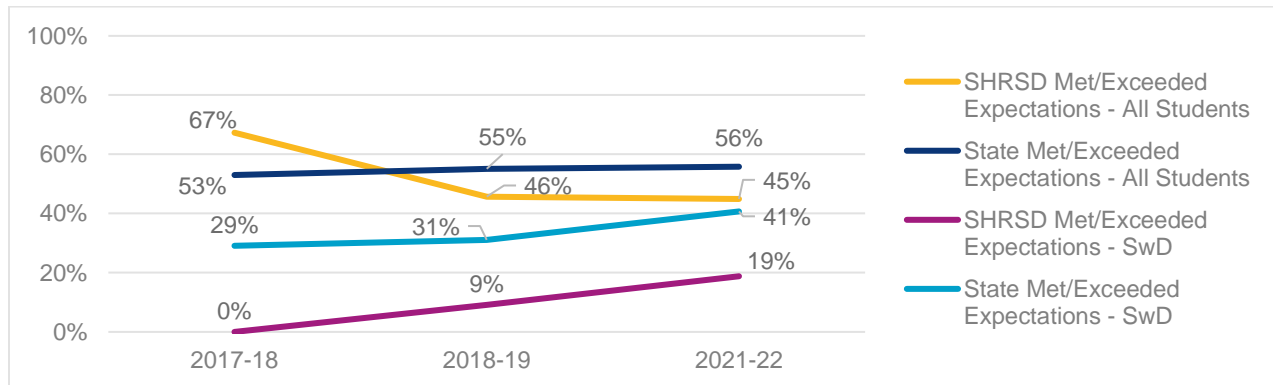
Grade 8. Between 2017-18 and 2018-19, the percentage of SHRSD students with IEPs who met or exceeded expectations on the grade 8 mathematics assessment was aligned with the state average for students with disabilities. Compared to their non-disabled peers, the percentage of SHRSD students with IEPs who met or exceeded expectations was slightly smaller. Between 2017-18 to 2021-22, the overall achievement gap between SHRSD non-disabled students and students with IEPs was four percentage points.

Exhibit 21. Grade 8 Mathematics, 2017-18 to 2021-22
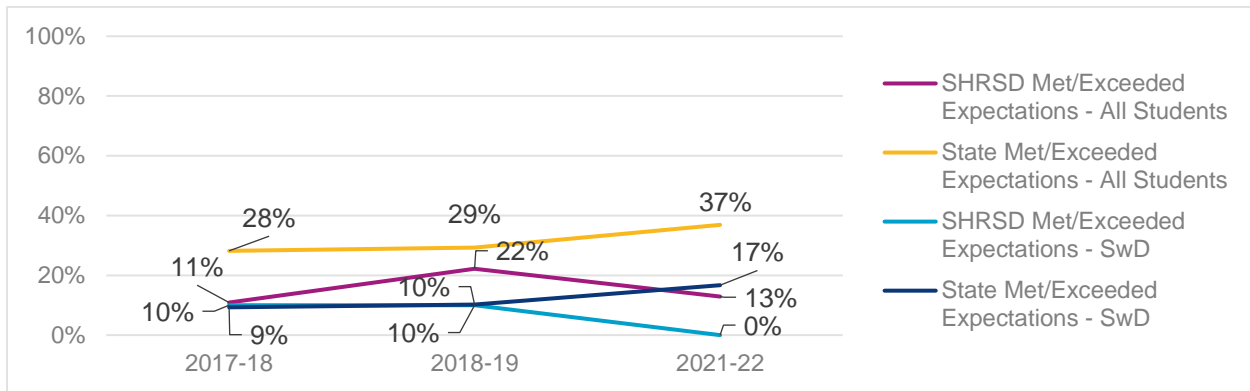
Algebra. Between 2017-18 and 2021-22, the percentage of SHRSD students with IEPs who met or exceeded expectations on the Algebra I assessment was lower than the state average for students with disabilities. However, in 2018-1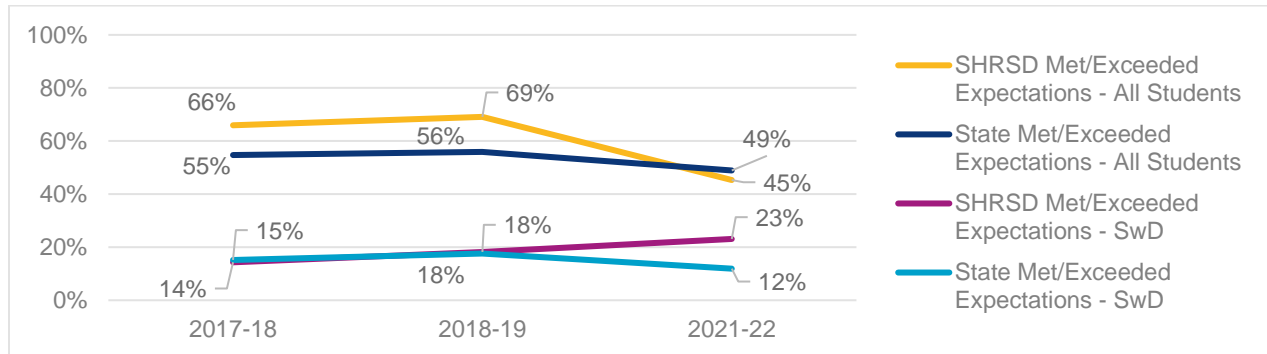9, the percentage of SHRSD students with IEPs who met or exceeded expectations on the Algebra I assessment was higher than the state by seven percentage points. A smaller percentage of SHRSD students with IEPs met or exceeded expectations when compared to their non-disabled peers. The three-year average achievement gap between SHRSD students with disabilities and those without disabilities was 24 percentage points.

Exhibit 22. Algebra I, 2017-18 to 2021-22
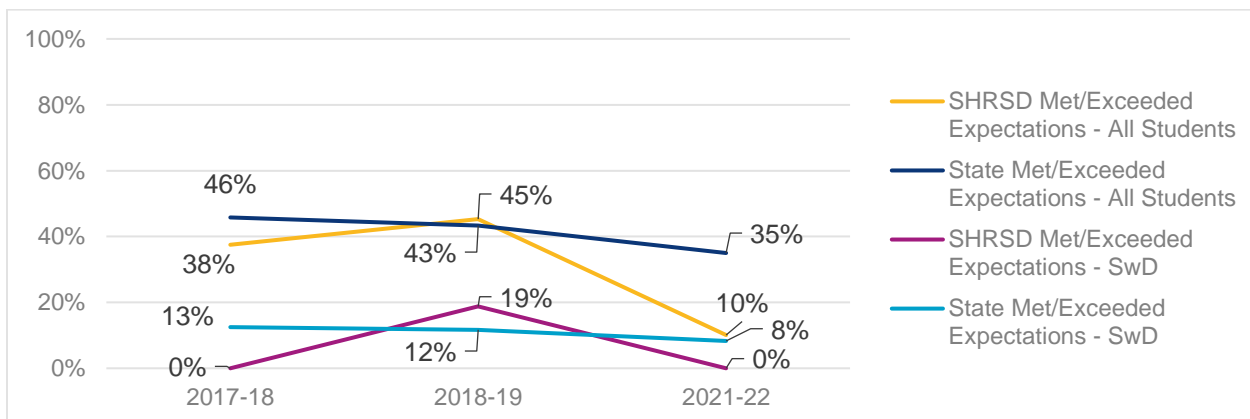
Graduation and Drop Out Rates

Between 2018 to 2021, the percentage of SHRSD students with IEPs graduating from high school in four years was above the overall statewide graduation rate.[43] Between 2019 and 2021, the percentage of SHRSD students with an IEP graduating from high school increased by 14 percentage points. Between 2020-2021, SHRSD students with IEPs graduated at a higher rate than the all-student graduation rate. In 2021, the four-year graduation rate was 100 percent for students with IEPs.

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[43] Graduation and drop out data obtained from NJ School Performance Report: https://rc.doe.state.nj.us/.

Exhibit 23. Percent of SHRSD and State Students with and without IEPs Graduating from High School in 2016-2020
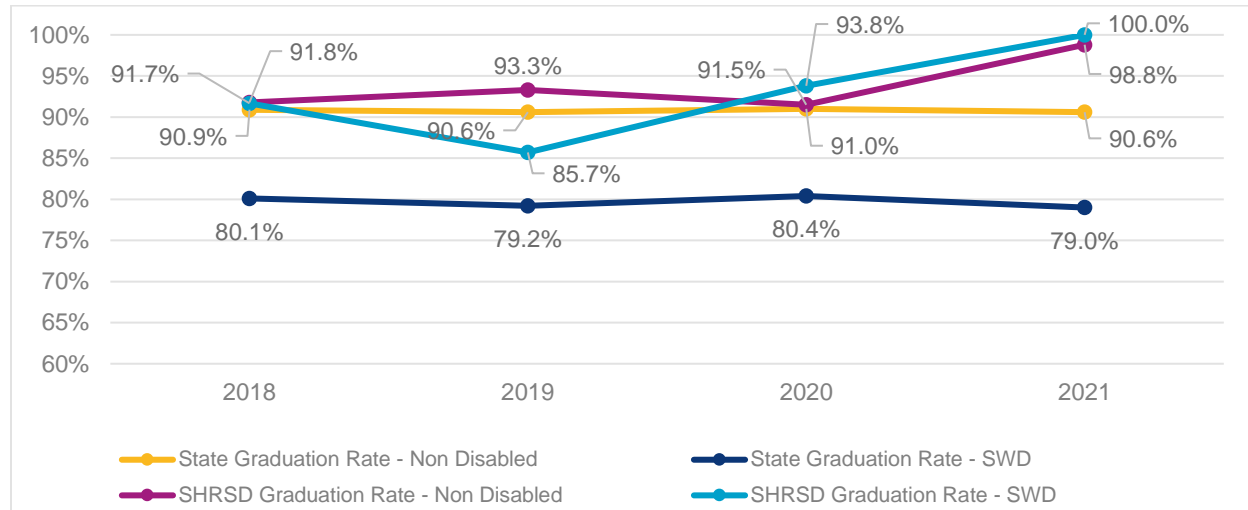
Since 2018, the percentage of students with IEPs who dropped out was 0 percent, lower than the state average of one percent.

State Performance Plan (SPP) and Annual Performance Report (APR)

The United States Department of Education (USED), Office of Special Education Programs (OSEP) has established SPP/APR requirements that include 17 indicators.[44] These indicators are categorized as either Compliance Indicators or Performance Indicators. In recent years, through Results Driven Accountability (RDA), OSEP has increased the emphasis of the Performance Indicators. While compliance indicators remain important, under RDA, OSEP has sharpened its focus on what happens in the classroom to promote educational benefits and improve outcomes and results for students with disabilities. This change is based on data showing that the educational outcomes of America's children and youth with disabilities have not improved as expected, despite significant federal efforts to close achievement gaps.

[44] New Jersey's Annual Performance Plan can be accessed online at:
https://www.nj.gov/education/specialed/monitor/spp/2021/index.shtml

The accountability system that existed prior to the new one placed substantial emphasis on procedural compliance, but it often did not consider how requirements affected the learning outcomes of students. Districts need both to raise the level of and access to high levels of rigor, and also to generate a culture of academic optimism.

Per the definitions provided by OSEP, RDA focuses on Performance Indicators (1-8, 14-16, and 17). Indicators 9-13 are Compliance Indicators. Although compliance remains important, RDA has amplified the meaningfulness of Performance Indicators.

Based on requirements set by OSEP, each state is required to develop annual targets and monitor Local Education Agency (LEA) performance on each special education indicator. The state must report annually to the public on its overall performance and on the performance of each of its LEAs according to the targets in its Annual Report (APR).[45]

Although the New Jersey Department of Education (NJDOE) Office of Special Education Programs (OSEP) reviews all special education indicators, according to the state's SPP/APR, it gives special consideration to indicators 4B, 11, 12, and 13, stating the following:[46]

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

The NJDOE monitors all districts each year through NJSMART, New Jersey's student level data system. Findings of noncompliance with Indicators 4B, 11 and 12 and with requirements related to Indicators 4A and 4B are identified through review of data from NJSMART and the Electronic Violence and Vandalism Report. Once districts are identified as noncompliant with Indicators 11 and 12 through written notification, a review of subsequent data or an onsite targeted review is conducted to ensure correction of noncompliance. For Indicators 4A and 4B, a self-review is conducted in districts that demonstrate a significant discrepancy in their rate of suspensions and expulsions over 10 days and/or a significant discrepancy in suspension/expulsion rate by race and ethnicity. Compliance with IDEA requirements related to discipline procedures, and positive behavioral supports, is reviewed.

For Indicators 4A and 4B, a self-assessment of discipline requirements, including policies, procedures and practices regarding development and implementation of IEPs, the use of positive behavioral interventions and supports and procedural safeguards is conducted by the LEA. Following the self-assessment, a written report of findings is generated. Corrective action activities are included in the report if noncompliance is identified and are based on any identified root causes of the noncompliance. Corrective action activities may include: the revision of procedures, staff training, and activities related to implementation of procedures, and/or oversight of implementation of procedures.

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[45] Annual reporting on the performance of each New Jersey school districts according to the targets in New Jersey's State Performance Plan can be accessed online at: https://www.nj.gov/education/specialed/monitor/spp/2021/index.shtml
[46] Introduction to New Jersey State Performance Plan (SPP)/ Annual Performance Report (APR) FFY 2021: https://www.nj.gov/education/specialed/monitor/spp/2021/index.shtml

Findings of noncompliance with Indicator 13 are identified through a targeted desk audit review. Districts and charter schools are selected for the targeted review based on a schedule that ensures that each district and charter school, with students ages 16 and above enrolled will participate once during the SPP period. The selection of districts is aligned with the selection for Indicator 14, so that districts participate in the Indicator 13 targeted review 2 years prior to their participation in the outcome study. The intent is to ensure that appropriate transition planning will lead to better outcomes for the students in each cohort.

In the 2020-21 school year, SHRSD did **not** meet SPP targets in three of the seventeen indicators.[47] These areas include the following four performance indicators and one compliance indicators:

- Indicator 5: School Age LRE – Performance Indicator
- Indicator 11: Effective General Supervision of Part B/ Child Find
- Indicator 14: Postsecondary Transition Outcomes-Performance

For Indicator 5, SHRSD did not meet state targets for the percent of children with IEPs aged 5 who were enrolled in kindergarten and aged 6 through 21 served in public or private schools, residential placements, or homebound or hospital placements. This metric is an important consideration as SHRSD continues to evaluate the expansiveness of its least restrictive environment continuum.

Exhibit 24: Indicator 5, year 2020-21

Indicator 5 Description	Local Data	State Target	Met State Target
A. Percent of children with IEPs aged 5 who were enrolled in kindergarten and aged 6 through 21 served inside the regular class 80% or more of the day.	57.14%	45.00%	Y
B. Percent of children with IEPs aged 5 who were enrolled in kindergarten and aged 6 through 21 served inside the regular class less than 40% of the day.	9.94%	14.75%	Y
C. Percent of children with IEPs aged 5 who were enrolled in kindergarten and aged 6 through 21 served in public or private separate schools, residential placements, or homebound or hospital placements.	9.94%	6.75%	N

SHRSD did not meet Indicator 11: percent of children in SY 2020-21 who were evaluated within the State established timeline of 90 days from the date of parent consent for initial evaluation. It is important to note this metric can be significantly impacted due to the COVID-19 global pandemic.

Exhibit 25: Indicator 11, 2020-21

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[47] Because of the collection schedule of these data, the most recently available data is from the 2017-18 school year.

Indicator 11 Description	Local Data	State Target	Met State Target
Percent of children in SY 2020-21 who were evaluated within the State established timeline of 90 days from the date of parent consent for initial evaluation.	83.33%	100.00%	N

SHRSD did not meet Indicator 14 in each of the 3 indicator descriptions: A) percent of youth who are no longer in secondary school, had IEPs in effect of the time they left school, and were enrolled in higher education; B) percent of youth who are no longer in secondary school, had IEPs in effect at the time they left school, and were enrolled in higher education or competitively employed, and C) percent of youth who are no longer in secondary school, had IEPs in effect at the time they left school, and were enrolled in higher education or competitively employed in some other postsecondary education or training program or in some other employment.

Exhibit 26: Indicator 14, 2020-21

Indicator 14 Description	Local Data	State Target	Met State Target
A. Percent of youth who are no longer in secondary school, had IEPs in effect at the time they left school, and were enrolled in higher education.	36.36%	48.00%	N
B. Percent of youth who are no longer in secondary school, had IEPs in effect at the time they left school, and were enrolled in higher education or competitively employed.	72.73%	74.00%	N
C. Percent of youth who are no longer in secondary school, had IEPs in effect at the time they left school, and were enrolled in higher education or competitively employed or in some other postsecondary education or training program or in some other employment.	72.7%	87.00%	N

Summary and Implications

According to the quantitative data analysis, SHRSD has achieved some successes in the identification, achievement, and placement of students with disabilities but also faces significant challenges with raising outcomes for students with disabilities. Students with disabilities enrolled in SHRSD are very likely to graduate; however, post-secondary outcomes for these students falls short of state expectations. Some campuses within the district have well-established Intervention & Referral Services (I&RS) practices while others are being shaped. The contrast of success and shortcomings continue to persist for students with disabilities in SHRSD. As SHRSD charts a new course, attention should be paid to data trends that, if not corrected, could continue to create obstacles for equitable access to a high-quality education for all students with disabilities.

IV. INTERVENTION SUPPORT, REFERRAL, AND IDENTIFICATION PRACTICES

Strengths	Opportunities
• Initial development and implementation of I&RS practices. • Investment in diversity of interventions to promote student outcomes.	• Inconsistency in I&RS and MTSS practices across all campuses. • Need for formal, digitized tracking mechanisms of students receiving I&RS or MTSS interventions. • The perception of ELL students being disproportionately referred.

Referral Process

In New Jersey, when a child is identified as possibly having a disability, their matter is referred to the district's special education administration who then subsequently refers it to the district's Child Study Team (CST). Referrals may be submitted by instructional, administrative and other professional staff of the local school district, or parents and state agencies, including the New Jersey Department of Education (NJDOE), concerned with the welfare of students.[48] However, in New Jersey, when it is first identified that a child is struggling, districts first engage the support of its Intervention and Referral Services (I&RS) team.

Intervention and Referral Services (I&RS)

As stated in code, interventions in the general education setting are to be provided to students exhibiting academic difficulties and shall be utilized, as appropriate, prior to referring a student for an evaluation of eligibility for special education and related services.[49] When it is determined through analysis of relevant documentation and data concerning each intervention utilized that interventions in the general education program have not adequately addressed the educational difficulties and it is believed that the student may have a disability, the student shall be referred for an evaluation to determine eligibility for special education programs and services.[50] In New Jersey, the staff of the general education program are required to maintain written documentation, including data setting forth the type of interventions utilized, the frequency and duration of each intervention, and the effectiveness of each intervention.[51]

The New Jersey State Board of Education adopted rules in April 2001 to provide district boards of education with standards for the delivery of Intervention and Referral Services (I&RS).[52] The requirements set forth in these regulations are intended to provide schools with direction in formulating coordinated services and team delivery systems to address the full range of student learning, behavior, and health problems in the general education program. I&RS is designed to be a student support service approach that helps school-based staff and parents address "early identification and intervention of problems at the elementary, middle and high school levels."[53] Under these regulations, New Jersey schools have the flexibility to choose the

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[48] N.J.A.C. 6A:10A-3.3(a)3ii
[49] N.J.A.C. 6A:14-3.3
[50] Id.
[51] Id.
[52] The regulations state that Districts must "… establish and implement a coordinated system in each school building for the planning and delivery of intervention and referral services that are designed to assist students who are experiencing learning, behavior, or health difficulties…" [N.J.A.C. 6A: 16-7.1(a)]; and which are designed to: "…assist staff who have difficulties in addressing students' learning, behavior, or health needs." [N.J.A.C. 6A:16-7.1(a)].
[53] I&RS Resource Manual. In February 2014, the New Jersey State Board of Education re-adopted *N.J.A.C.* 6A:16, with amendment to the regulations at *N.J.A.C.* 6A:16-8 that establish intervention and referral services (I&RS). The 2008 I&RS manual is being updated to reflect these changes and will be posted to the state's website upon completion.

most appropriate team configuration to perform I&RS services for their buildings. In addition, they have the flexibility to choose appropriate interventions.

I&RS regulations in New Jersey pre-date the national movement toward a Multi-Tiered System of Support (MTSS) framework.[54] However, the intent of the work is aligned: to provide a "coordinated, formal, and well-articulated system of supportive activities and services for staff who have identified student difficulties and those who will be involved in the amelioration of the identified educational concerns."[55]

I&RS in SHRSD

In SHRSD, I&RS is overseen by the Director of Pupil Services in collaboration with the Director of Curriculum, Assessment, and Instruction. Each of the three schools within SHRSD, Lambertville Public School (Elementary), West Amwell Township Elementary School, and South Hunterdon Middle & High School, houses an I&RS team. The graphic below outlines the general structure of the teams with one distinction of no Standards of Support Teacher or Reading Specialist on the Middle & High School I&RS team:
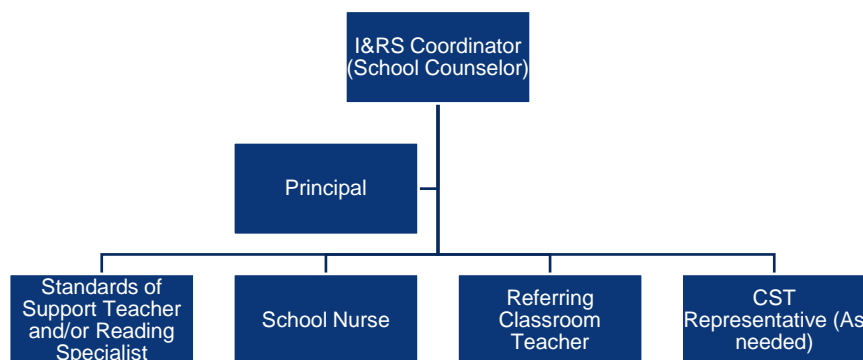
According to district administration, the role of I&RS Coordinators is to lead and attend all I&RS meetings to ensure the following: interventions are put in place with a monitoring/data collection tool; fidelity to the data tool and collection period; a team approach to supporting students; use of individual testing tools to guide interventions provided in general education; involvement of the appropriate staff to support students demonstrating signs of academic concerns or behavioral issues to determine the cause of the issues with supports put in place. It is important to note that it was reported that I&RS processes are different by school. One school has built extensive procedural and documentation guidance that is being utilized as a model for the district. Practices related to I&RS are discussed generally within the body of this report as a district-wide model is not implemented with consistency.

SHRSD's I&RS processes were described anecdotally as an ongoing, eight-week cycle. The team convenes to set specific goals and monitor goal implementation and student progress. After eight weeks, the team reconvenes to discuss modifications to the goals and strategies in place. A student would experience at least two cycles of I&RS, as designed, before the team discusses moving towards a referral to assess eligibility for special education and related services. Focus group participants suggested that

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[54] RTI is a systemic, multi-tier approach to help support students with learning and behavior needs and seeks to prevent academic failure through early identification, frequent progress monitoring, and increasingly intensive research-based instructional interventions for children who continue to struggle. The RTI method was developed as an alternative to the discrepancy-model, which requires children to exhibit a discrepancy between their ability (as measured by their IQ) and their demonstrated academic achievement (http://www.rtinetwork.org/).

[55] I&RS Resource Manual.

students may get "stuck" in I &RS as there are delays in staffing to support evaluation to determine special education eligibility or lack of clarity in the fidelity of intervention implementation.

A student's participation in the I&RS intervention process varies by team. A variety of data sources are presented when considering students referred. For example, a low benchmark score functionally equivalent to one year behind grade level standards can justify student referral to I&RS. In comparison, it was reported that there is no consistent threshold of when I&RS processes are initiated after a student is not responsive to other classroom-based supports.

The district has established an informal expectation that students should not be referred immediately at the start of the school year. Some focus group participants alluded to the practice of ELL students and preschoolers with limited school experience or language exposure being disproportionately referred at the start of the school year. Alternatively, other focus group participants expressed frustration that students who would benefit from intervention support immediately are not afforded the opportunity to access those interventions through the formal I&RS process. The lack of clarity and consistency in process and expectation have impacted staff perspectives on I&RS. It is critical that the district continues to standardize protocols for I&RS referrals and practices across teams to ensure students have equitable experiences regardless of school assignment.

Processes for tracking I&RS referrals and progress monitoring continues to evolve as a practice in SHRSD. Some district guidance exists on how to initiate an I&RS referral through Frontline, the district's IEP management system. Additional progress monitoring and data collections procedures are housed within this system. Anecdotal feedback was provided by interview and focus group participants that variability in referral and data collection procedures may impact the team's collective ability to meaningfully track student progress when participating in formalized interventions.

According to the SHRSD staff survey, of the 108 staff who responded to the question: "Before a student is referred for special education, every attempt is made to meet the student's needs through general education" almost 73% responded "yes," over 11% responded "no" and over 10% responded "don't know". Comparatively, only 54% of SHRSD believe their school offers sufficient Tier 1 general education reading intervention support and 47% believe their school offers sufficient Tier 1 general education math intervention support. Those responses indicate further variability with Middle school respondent staff rating general education intervention support the lowest at 39% and 35% respectively. However, Preschool and Elementary respondents consistently rated their schools higher in offering reading and math intervention support within the general education setting.

Exhibit 27. Staff Survey: Before a student is referred for special education, every attempt is made to meet the student's needs through general education interventions.
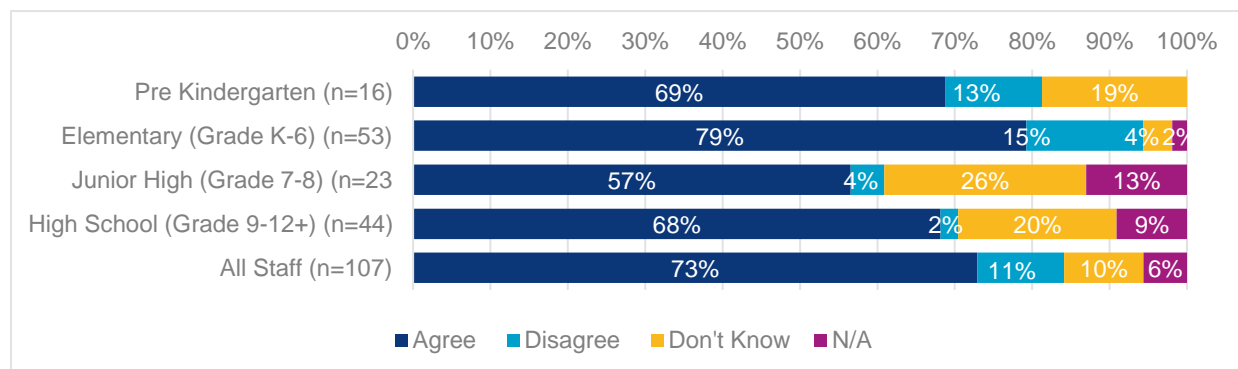
Exhibit 28. Staff Survey: Our school provides sufficient Tier 1 general education reading intervention support.
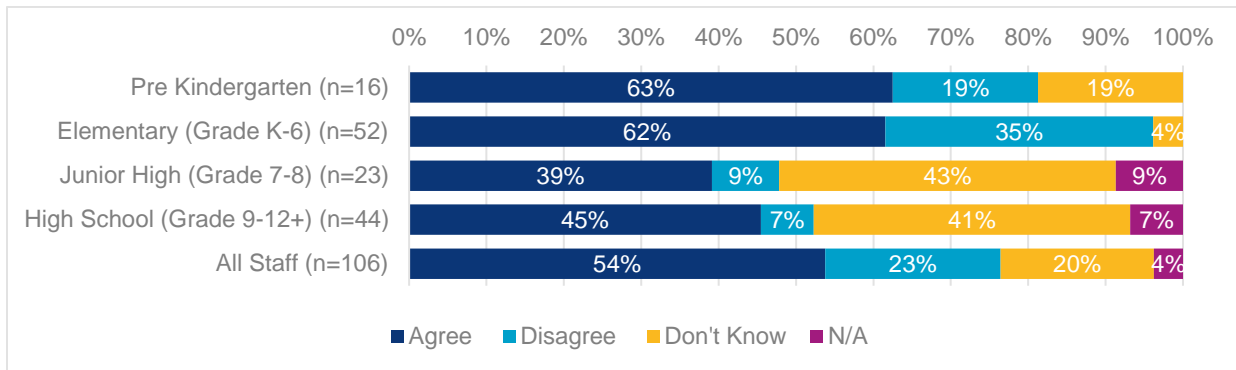
Exhibit 29. Staff Survey: Our school provides sufficient Tier 1 general education math intervention support.
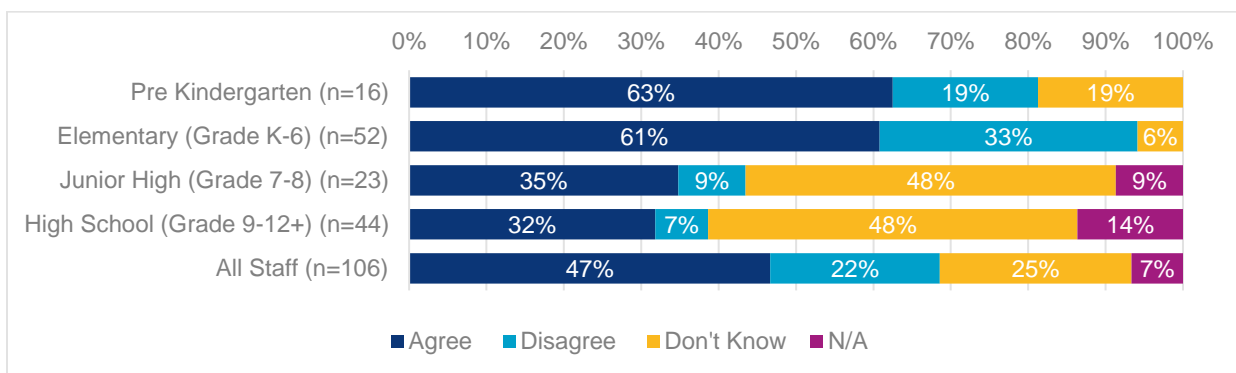
Multi-Tiered System of Support (MTSS)

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 and IEP plans.[56] It is designed to be a general education initiative. The 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.[57] When implemented as intended, MTSS leads to increased academic achievement by supporting rigorous core instruction and strategic/targeted interventions, and improved student behavior. Furthermore, the framework has been successfully used to support a reduction in disproportionate special education referrals of students based on race, gender, or EL 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."[58] MTSS provides an overall framework for structuring

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[56] 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.

[57] 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.

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

and coordinating the provision of core instruction along with the additional behavioral supports, 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 general instruction that is provided in Tier 1.

New Jersey Framework

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 and linguistically appropriate and is implemented with integrity for all students. The framework is based on a presumption that some students require additional instruction in order to achieve grade level standards. Increasingly intensive tiers of academic and social/emotional support are targeted to meet student needs based on data-based problem-solving and decision-making; instruction is adjusted to continually improve both student performance and the rate at which it progresses. Furthermore, the process is used to assess (using student responses to the instruction) the effectiveness of the tiered instruction/interventions being implemented. Many states have established intervention systems that align to the core tenets of the MTSS process and branded them accordingly. In New Jersey, MTSS has been adopted as the New Jersey Tiered System of Support (NJTSS).

NJTSS is a framework of academic and behavioral supports and interventions to improve student achievement based on the core components of MTSS and the three-tier prevention logic of Response to Intervention (RtI). It builds upon the I&RS model and gives schools a structure to meet the academic, health, enrichment, and social emotional needs of all students. The tiered system involves the systematic development of nine essential components in schools for the effective implementation of the framework with fidelity and sustainability. Those components include:

- Effective district and school leadership;
- Family and community engagement;
- Positive school culture and climate;
- High-quality learning environments, curricula, and instructional practices;
- Universal screening;
- Data-based decision making;
- Collaborative problem-solving teams
- Progress monitoring; and
- Staff professional development.[59]

Exhibit 30: New Jersey Tiered System of Support (NJTSS) Pyramid, 2020-21 School Year

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[59] New Jersey Tiered Systems of Support, https://www.state.nj.us/education/njtss/brief.pdf

Tier 3 provides *intensive supports and interventions* that may be delivered individually and provided in or outside of the classroom after the delivery of core instruction. There may be *adaptations* of supports and interventions based on an individual student's performance using data that are reviewed during frequent progress monitoring intervals.

Tier 2 provides *supplemental supports and interventions* that may be delivered in small-group instruction, provided in either the general classroom or during an intervention period. Interventions include evidence-based instructional practices and interventions that increase in intensity, frequency and duration based upon the review of data during regular progress monitoring intervals.

Tier 1 provides *high-quality learning environments, evidence-based curricular and instructional practices, and a continuum of supports and interventions* in general education classrooms, including bilingual classrooms, delivered with fidelity by trained teachers with the support of other professionals.

The three tiers of supports and interventions are bolstered by effective school and district leadership committed to the implementation of the system, a positive school culture and climate that is conducive for learning, and family and community engagement in the development and implementation of the framework. Across all tiers, some students may require accommodations that provide access to instruction. These supports are not contingent upon a student's level of instructional support but are necessary to access content and achieve meaningful participation in the instruction.

District Practices

In SHRSD, MTSS is overseen by the Director of Pupil Services although some focus groups participants suggested it is under the purview of Curriculum and Instruction. According to data gathered from interviews and focus groups the use of a tiered system of support (MTSS) is not formalized across the district. In addition, some in the district refer to MTSS as Response to Intervention (RtI). The district committed Standards of Support (SoS) intervention opportunities only accessed by students in Title I school(s). According to information listed on the district's website, its Tiered System of Support includes the following three tiers with corresponding interventions:

Exhibit 31: SHRSD Tiered System of Support, (Published on District Website)
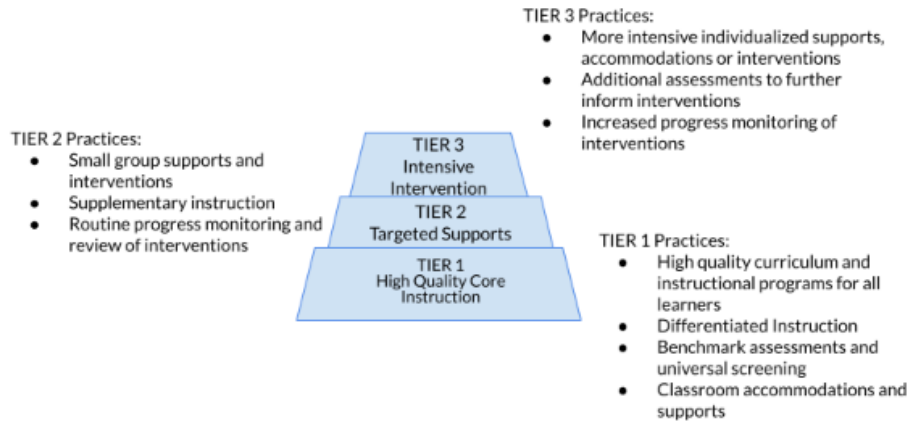
SHRSD provided guidance on the district's current MTSS practices as part of this review. The following was cited as Tier 1 through Tier 3 MTSS practices:

- K-6 benchmark testing in Literacy and Math (DIBELS and Fountas and Pinnell, STAR, Acaidence)
- 7-12 STAR Reading and Math benchmark writing assessments (newly implemented)
- Universal screening for mental health supports
- Standards with Support in Title 1 programming which includes basic skills instruction and/or remediation through a pull-out service model

Two unique perspectives emerged as themes when analyzing qualitative data gathered on RTI or MTSS procedures in SHRSD:

- "There's a fear that with MTSS under Director of Pupil Services it could be seen as a special education initiative."
- "MTSS or RtI has evolved over time in SHRSD. Some staff members still see it as a pathway to special education versus a pathway to keeping students in general education. Staff do not shy away from special education."

While MTSS is not promoted as a special education initiative, being housed within the division responsible for providing special education and related services and lack of clarity in district vision for interventions collectively has inadvertently shaped staff perceptions. The transition from I&RS to MTSS or a special education referral was anecdotally described as a "gray area." Qualitative data consistently suggests that staff are well-meaning and genuinely want students to receive intervention support to improve academic and behavioral progress. However, the processes and structures that exist within SHRSD to support advancement remain unclear.

According to SHRSD staff who responded to the survey question "I would like to attend professional development on the Differentiated Instruction":
- Over 60% of respondents agree that they would like to participate in this training. However, almost 82% of preschool respondents expressed an interest in this professional development opportunity compared to approximately 50% of middle school and high school respondents.

The trend of SHRSD survey preschool and elementary survey respondents prioritizing professional development in increasingly intensive reading, and math interventions and Response to Intervention (RTI) or Multi-Tiered Systems of Supports (MTSS) continued:

- Although over 63% and 68% of Preschool and Elementary teachers respectively would prioritize increasingly intensive math interventions, only 25% of High School respondents would attend a professional development session on math intervention.

Exhibit 32. Staff Survey: Differentiated Instruction
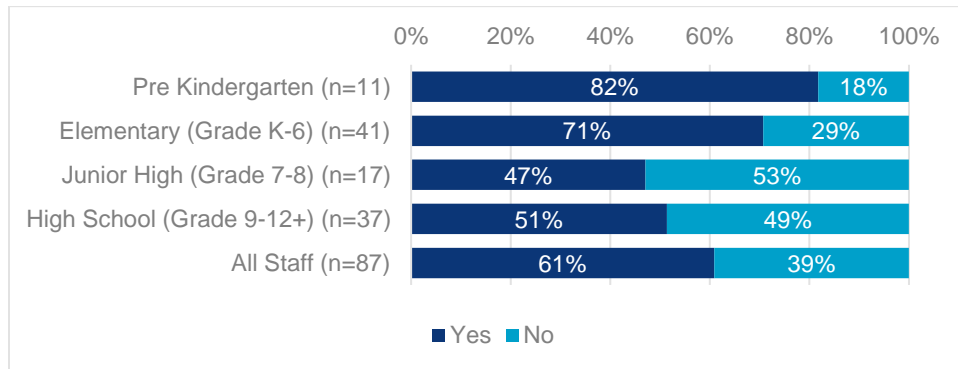
Exhibit 33. Staff Survey: Increasingly intensive reading interventions
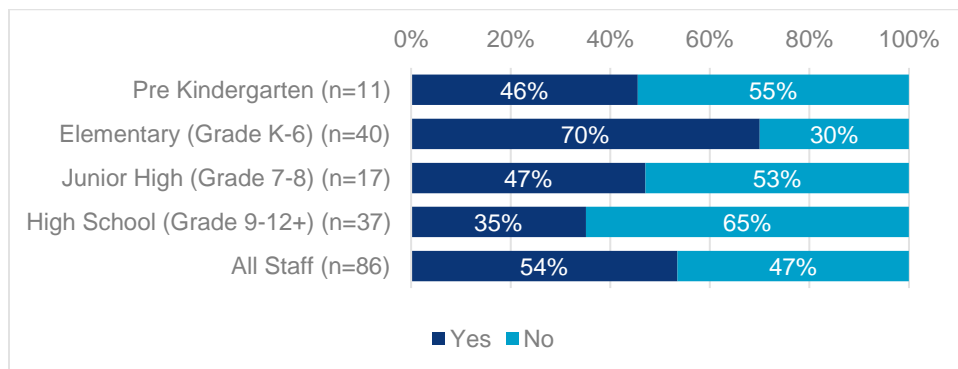
Exhibit 34. Staff Survey: Increasingly intensive math interventions
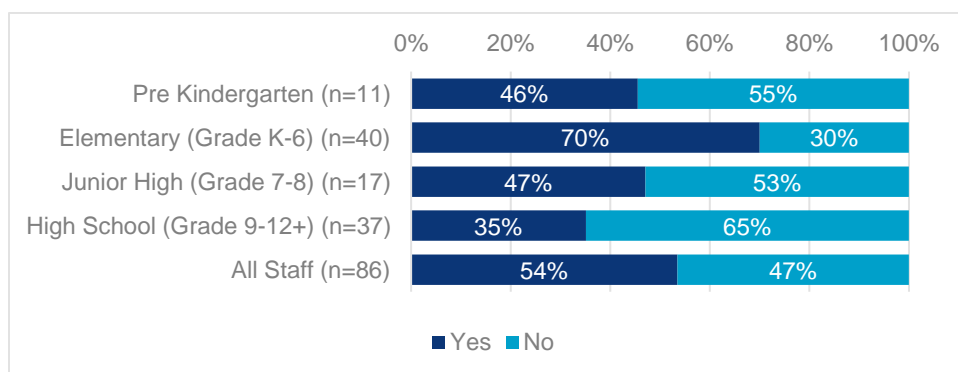
Positive Behavior Support System

As noted by focus group and interview participants, SHRSD does not have a formal district-wide system in which data is collected and analyzed either infused into its MTSS or outside of it. However, there are mixed perceptions regarding the need for more comprehensive, formalized and consistent behavior support approaches. According to qualitative data analyzed, there is no school-wide positive behavior support system; no consistent format for addressing individual problem challenges; and classrooms behavior is managed by the teacher. Some SRHSD staff have received training in the "Zones of Regulation" and other mindfulness programs to promote positive behavior in the classroom. Implementation varies from teacher to teacher and is more likely to be observed in early childhood and elementary settings. The district has acquired two contractual, Board-Certified Behavior Analysts (BCBAs). Both BCBAs provide behavior support and intervention to students with disabilities and non-disabled peers.

Although SHRSD has a tiered system of support, it does not infuse a positive behavior support system within it.

According to respondents who participated in the staff survey:

- Among middle school and high school respondents, over 38% of respondents agree their school provides sufficient Tier 1 general education behavior intervention support; however, over 30% responded saying they did not know.
- Among elementary respondents, over 69% disagreed that their school provides sufficient Tier 1 general education behavior intervention support.

Exhibit 35. Staff Survey: Our school provides sufficient Tier 1 general education behavior intervention support.
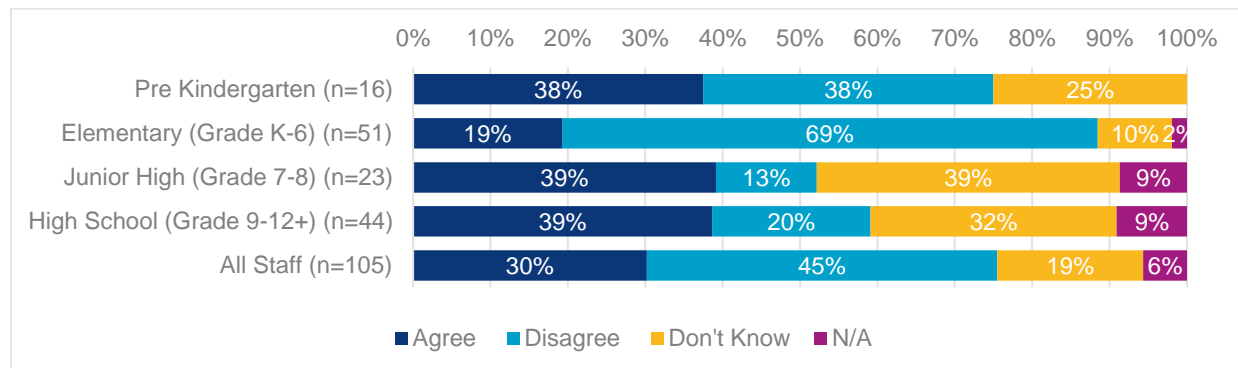
According to respondents who participated in the staff survey:

- Over 58% of all respondents agree that prior to a referral for special education, the impact of a child's native language on academic performance or behavior is considered; however, over 22% disagreed and 14% did not know.
- Over 78% of special education teachers agree or strongly agree that before a student is referred for special education, every attempt is made to meet the student's needs through general education intervention; however, over 12% did not agree.

Exhibit 36. Staff Survey: Prior to a referral for special education, the impact of a child's native language on academic performance or behavior is considered.
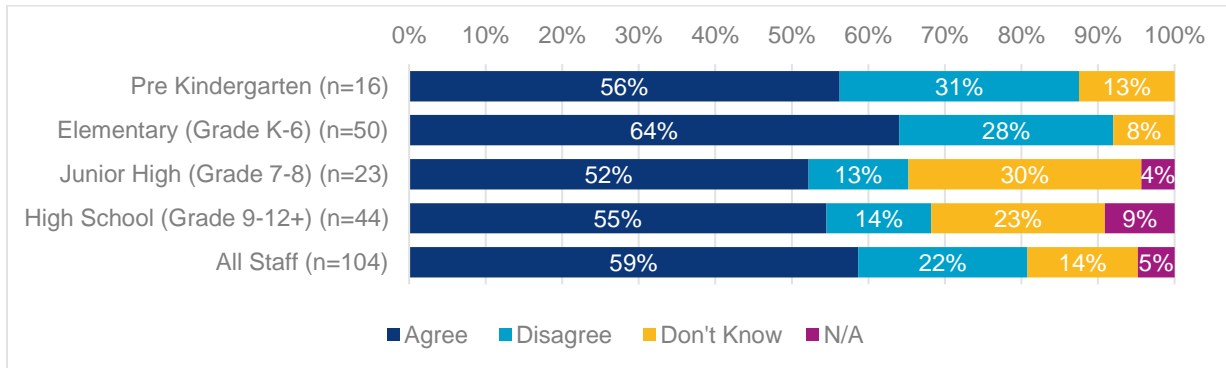
Exhibit 37. Staff Survey: Before a student is referred for special education, every attempt is made to meet the student's needs through general education interventions.
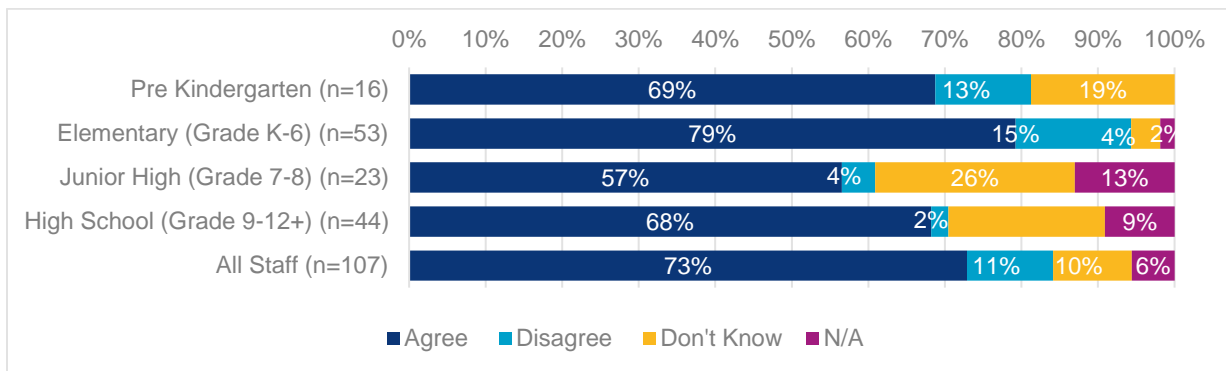
SHRSD staff interest in attending professional learning opportunities targeting general education initiatives, such as positive behavior intervention and supports, is consistent with other findings. Specifically:

- 100% of Preschool and 95% of Elementary survey respondents would prioritize attending training on positive behavior intervention and supports. Comparatively, only 56% and 54% of middle school and high school respondents expressed an interest in this training opportunity.

Exhibit 38. Staff Survey: Positive behavior intervention and supports
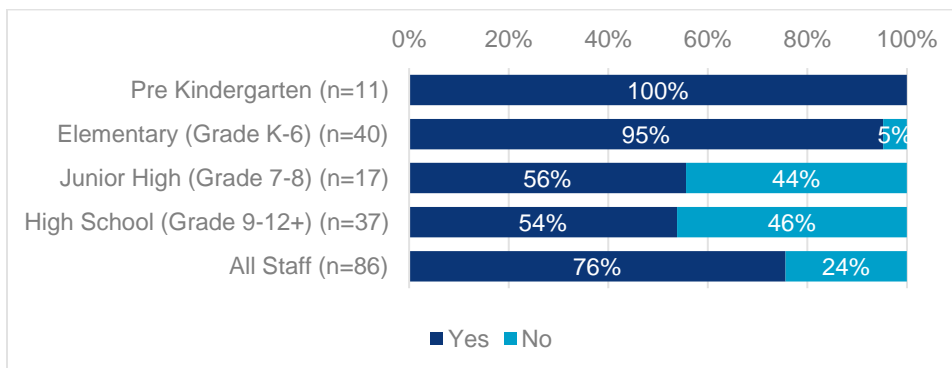
Referral

Following a referral for special education services, the parent or guardian is provided notice to a meeting to determine the need for an evaluation. By law, this meeting occurs within twenty calendar days of receipt

of the written request by the district to determine if an evaluation is warranted. During this meeting, existing evaluation data on the student is reviewed. In addition, current classroom-based assessments and observations are shared. Per code, if the CST determines an evaluation is not warranted, within fifteen days the parent is provided written notice. If the CST determines that an evaluation is warranted, the student is considered identified as potentially being a student with a disability and a case manager is assigned.

According to SHRSD staff who participated in the survey:

- Over 57% of staff agreed they fully understand the steps and timelines associated with the referral process and over 64% agreed they are comfortable recommending a student be referred for a special education evaluation.
- However, one's understanding of the referral process and level of comfortability referring students varied by grade bands of respondents. Middle school respondents rated consistently lower 48% respectively on both questions when compared to other respondents (Preschool, Elementary, and High School).
- 14% of all respondents reported and 25% of Preschool respondents, "not applicable", to feeling comfortable recommending a student be referred for a special education evaluation.

Exhibit 39. Staff Survey: I fully understand the steps and timelines associated with the referral process.
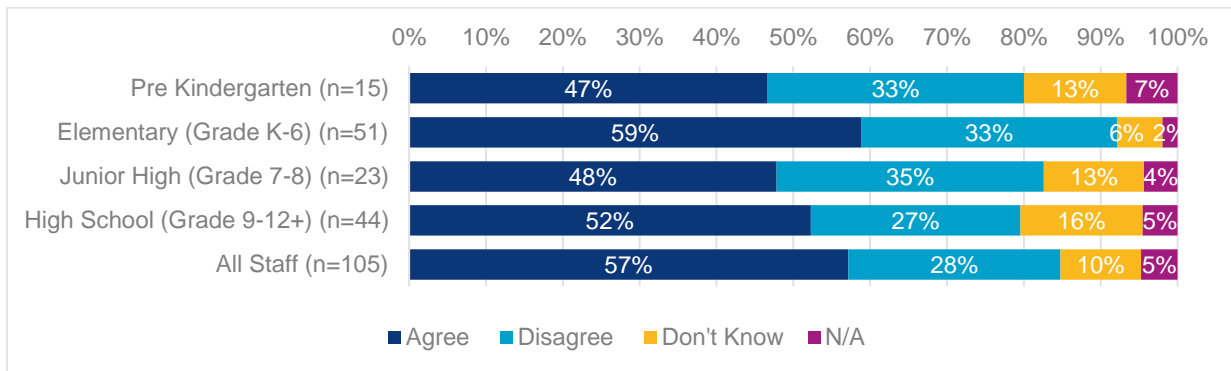
Exhibit 40. Staff Survey: I am comfortable recommending a student be referred for a special education evaluation.
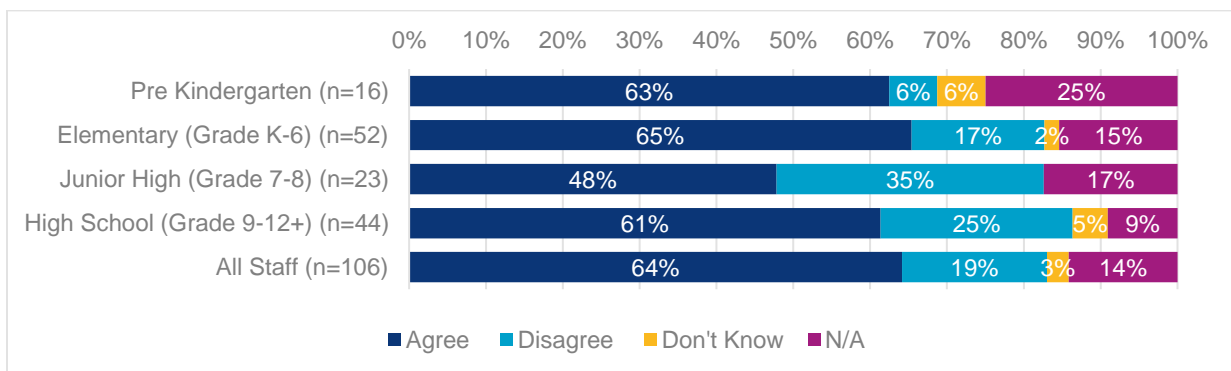
SHRSD were asked a similar survey question to compare their perspective on "staff in my school(s) fully understand the steps and timelines associated with the referral process. Significant discrepancies exist between one's perception of their understanding versus their colleague's understanding of district referral practices:

- Only 40% of all staff surveyed agree their colleagues are fluent in the steps and timelines associated with the referral process. Comparatively, 36% of staff survey indicated "disagreement" and 22
- 22% of staff indicated "they do not know."

Exhibit 41. Staff Survey: Staff in my school(s) fully understand the steps and timelines associated with the referral process.
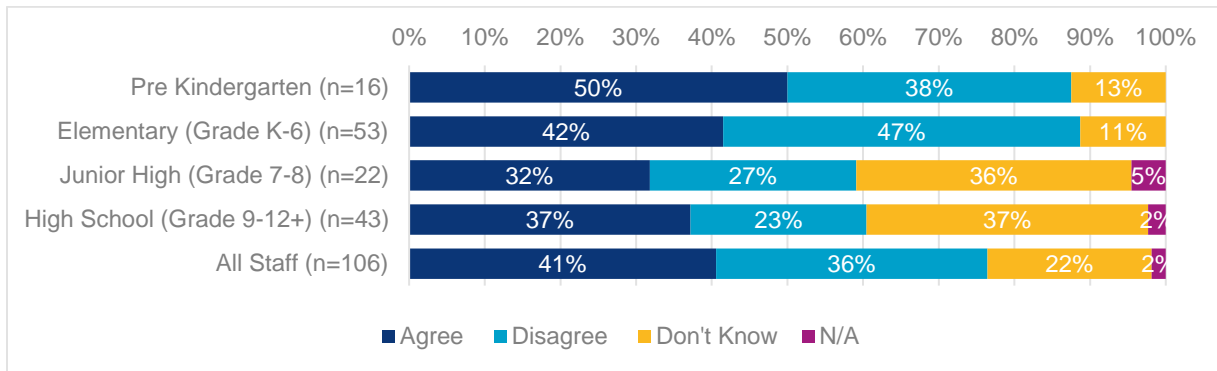
According to parents who participated in the parent survey, of the 43 parents who responded to the question: "Did SHRSD staff clearly explain to you why your child needed special education services?":

- Over 60% reported "yes" in comparison to 23% of respondents reporting "no." 16.3% of parent survey respondents indicated their child had an IEP at a prior district.

Exhibit 42. Staff Survey: Did SHRSD staff clearly explain to you why your child needed special education services?
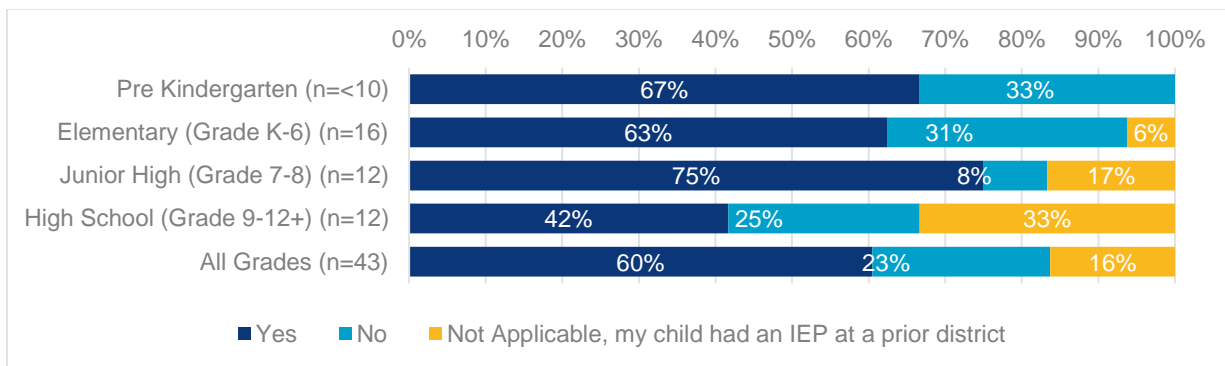
Focus group and interview participants shared concerns of ELL students potentially being over-referred for special education and related services. Three of the 24 referrals for special education evaluations made during the 2021-22 school year were for ELL students. That equates to 12.5% percent of all referrals.

Evaluation and Determination of Eligibility

When a CST determines that a child may have a disability, within fifteen days following their meeting with the child's parent, the district seeks a written request for consent from the parent (or adult student when they are age 18 or older). When the assessments are completed, a written report of the results of each assessment is prepared. A copy of the evaluation report(s) and documentation and information that will be used for a determination of eligibility shall be given to the parent not less than 10 calendar days prior to the meeting. After consent for initial evaluation has been received, the evaluation, determination of eligibility of services, and, if eligible, the development and implementation of the IEP are to be completed within ninety calendar days.

According to SHRSD staff who participated in the survey:

- More than half of respondents (52%) believe there is a delay in the process when a student is referred for special education services. Elementary respondents indicated most staff (79%) believe there is a delay compared to 50% of High School respondents who responded "I don't know.
- Approximately 65% of all staff agree that special education evaluations are sufficiently comprehensive to identify students' specific strengths and needs. This varies considerably by respondent type though: Preschool (69%), Elementary (72%), Middle School (46%), and High School (54%).
- 44.3% of respondents agree the results of special education evaluations are shared in ways that provide meaningful insights into students' educational needs. Comparatively, 44.3% of all respondents disagree that special education evaluations are shared with them in ways that provide meaningful insights into students' educational needs.

Exhibit 43. Staff Survey: There is no delay in the process when a student is referred for special education services.
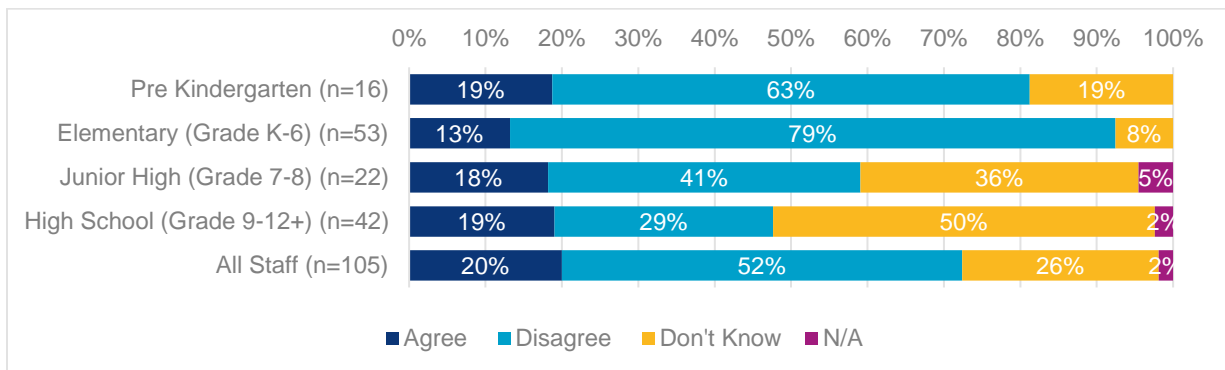
Exhibit 44. Staff Survey: Special education evaluations are sufficiently comprehensive to identify students' specific strengths and needs.
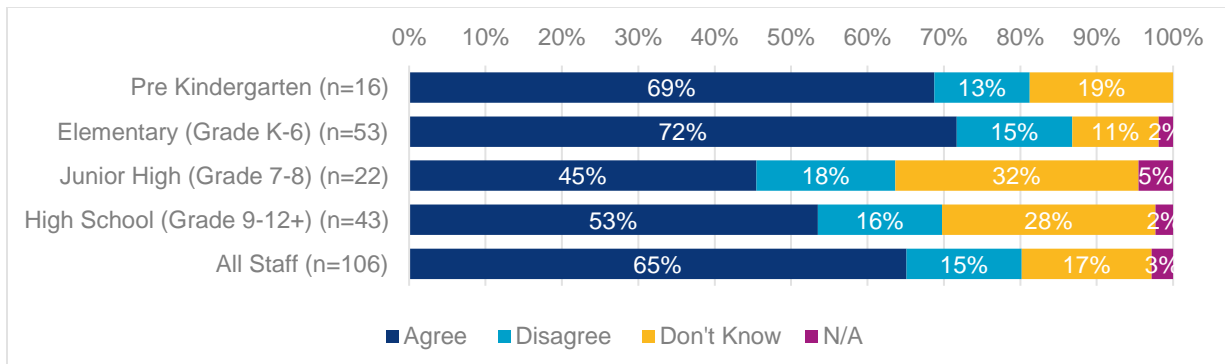
SHRSD focus group and interview participants expressed concerns with the district's ability to remain compliant with the timelines for special education evaluations. The district provided data on the referral/evaluation timelines for students referred and/or evaluated for special education services between July 1, 2021 and October 14, 2022[60]. A summary of findings can be found below:

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[60] Fall Special Education Submission- October 14, 2022. Report "Referral/Evaluation Timeline Report Students Referred and/or Evaluated for Special Education Services Between 1/1/21 and 10/14/22.

- A total of 51 SHRSD students were referred between July 1, 2021 and October 14, 2022 to determine if evaluations to determine eligibility for special education services. Of those 51 students, 46 students were evaluated. Of the 46 evaluated, 37 students were found eligible.
- Ten of the 46 evaluations conducted exceeded the timeline. This represents approximately 21.7% of evaluations conducted during this period exceeding the timeline. It is important to note that evaluation timeliness is impacted by various factors. The COVD-19 pandemic may have contributed to timeliness of evaluations conducted during this period.
- Reasons cited by SHRSD for exceeding the timeline include: 1) "delays in scheduling evaluation/assessment (5 instances), 2) "missed appointments by the child or parent (2 instances), 3) "child study team or related services personnel unavailable (1 instance), and 4) no reason cited (2 instances).

RDA indicator data suggests that this is an area of growth for SHRSD. Several factors contribute to special education evaluation timeline adherence. Specifically, the district utilizes the CST to conduct initial evaluations. This small team balances a number of other workload responsibilities, including case management for all students with disabilities in the district, which may inhibit their ability to conduct timely evaluations.

English Language Learners with a Suspected Disability

English Language Learners (ELLs) and Recently Arrived Immigrant English Learners (RAIELs) are a highly diverse group, encompassing important subgroups such as students born in the United States whose home language is one other than English or with refugee status, unaccompanied minors, and students with limited or interrupted formal education. ELLs and RAIELs enter schools at all grade levels, with varied initial English proficiency levels, educational backgrounds, and home language literacy levels. These students bring unique and valued strengths to the classrooms, but also frequently face shared challenges. While RAIELs share with other ELLs a common need to acquire English proficiency, they also often have needs that non-recently arrived ELLs do not typically have. These include mental, physical, and social needs that are shaped by dislocation and trauma exposure; academic needs that pertain to limited or interrupted prior formal schooling; and adjustment to the norms and characteristics of a new country, community, and school setting. Given this wide range of challenges, it is no surprise that education agencies struggle to develop policies and practices that adequately address both the ELLs' and RAIELs' needs.

As noted in a July 2015 WestEd study, which included an extensive review of the literature and research across schools, districts, and states, two factors were identified that lead to inconsistent identification of students who may have learning disabilities: 1) a lack of understanding among teachers about why ELL students are not making adequate progress, and 2) a poorly designed and implemented referral processes. The study also reviewed state guidelines and protocols from 20 states with the largest populations of ELL students on the practices of how they identify and support ELLs who have disabilities.[61]

During the 2021-2022, SHRSD contracted with a researcher to conduct an evaluation of its K-12 English as a Second Language Program. The evaluation results yielded positive feedback in teacher collaboration and intention instruction of new terminology and content. Like the PCG school visits observing instruction for students with disabilities, this researcher identified the need for access to grade-level content and differentiated instruction for ELLs. SHRSD leadership reviewed the findings and recommendations of program evaluation and provided PCG a copy of the report to review as part of this evaluation.

There is an increase, district-wide, in the request for bilingual evaluations. Currently, these evaluations are contracted out to private providers. If a student's native language is other than English, they would be recommended for a bilingual evaluation. There is no established, decision-making matrix consistently

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[61] Elizabeth Burr, Eric Haas, Karen Ferriere. Identifying and supporting English learner students with learning disabilities: Key issues in the literature and state practice, WestEd July 2015. Pages 2-14.
https://ies.ed.gov/ncee/edlabs/regions/west/pdf/REL_2015086.pdf

applied to how students are recommended or tracking mechanism to determine the volume of bilingual evaluation requests made. While it is difficult to ascertain the number of bilingual evaluations necessary versus those completed, concerns with the efficacy of this practice persist throughout divisions in SHRSD. According to focus group participants, inconsistent practices across schools relating to bilingual evaluations and limited access to resources are a challenge.

Ongoing collaboration between CST, special education services and ESL educators is necessary to ensure comprehensive special education evaluations and subsequent eligibility determination. It was reported by focus group participants that while students are not proficient in English, it is plausible a student is not proficient in their native language either. Collaboration to determine proficiency, evaluation protocols, and data to be considered when determining eligibility for special education and related services requires ESL teachers being involved in each step of the evaluation process. SHRSD must consider restructuring the partnership between both divisions to ensure ELL students receive appropriate considerations.

One participant indicated they are consulted as part of the evaluation process. When students are being evaluated by child study team it is not always in their home language, those that need to be tested in their home language there are a lack of resources available to support that. Other participants indicated that the tests are completed in Spanish for students at their school and parents are updated on the outcomes.

According to focus group participants, making determinations for students who grow up in non-native English-speaking homes has been a challenge. The district continues to complete an increase in bilingual evaluations, yet SHRSD staff still have challenges in determining the impact of language on achievement.

Summary and Implications

Although district leadership has made strides in understanding the root causes that impact student outcomes in SHRSD, including pursuing multiple outside reviews, action must continue to occur to address the areas of opportunity. Specifically, consistently implemented and tracked I&RS and MTSS processes. The K-12 English as a Second Language Program evaluation determined that ESL teachers had a more favorable perspective on ELL students' progress than non-ESL teachers and administrators. That perception can influence how students are recommended for intervention supports and subsequent referrals. It is critical that the district establishes formal tracking mechanisms to proactively address how perception can influence student support.

V. CONTINUUM OF SERVICES AND IEP DEVELOPMENT

Strengths	Opportunities
• Priority to be inclusive and promote a growth mindset for students with disabilities in SHRSD • Expansion of early childhood opportunities	• Limited continuum of services resulting in restrictive specially designed instruction service provision (in-class resource versus out of class resource) • Progress monitoring and re-evaluation assessment analyzed are not in alignment with best practices

Placement and Continuum of Services

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

Schools also need to create an environment in which each student is expected to learn, be supported and demonstrate learning at high levels. All teachers need more training and support throughout the school year to confidently implement differentiated instruction, accommodations and modifications, and specially designed instruction.

Of the staff who responded to the survey, 55% agreed that SHRSD offers a continuum of services to meet the needs of all students with IEPs. While 31% of respondents do not believe that SHRSD offers the necessary continuum to meet students with IEPs needs, approximately 12% reported "I don't know."

Exhibit 45. Staff Survey: SHRSD offers a continuum of services to meet the needs of all students with IEPs.
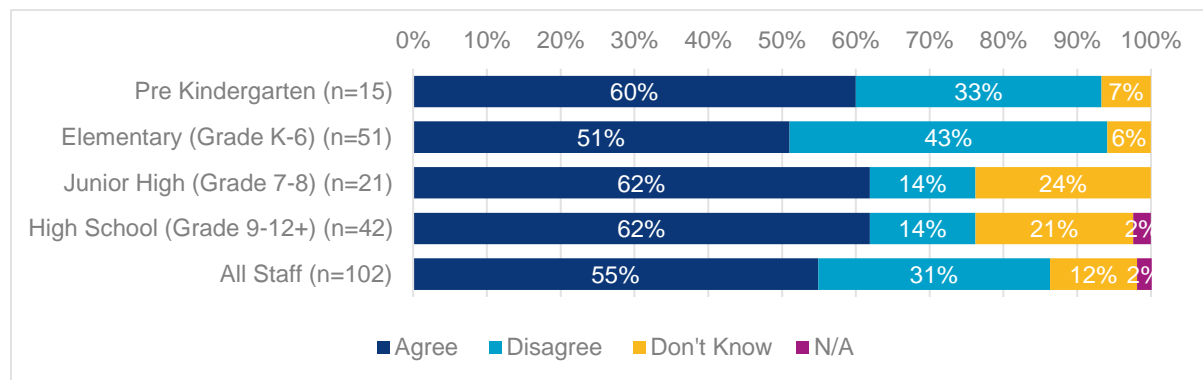
Special education administration noted the following about the district's continuum of services:

- Strengths
    - o Inclusive opportunities for students with disabilities and their non-disabled peers are an inherent practice due to the limited least restrictive environment continuum.
    - o There is a commitment to ensuring that student needs are met through out of district placements if the district cannot provide the necessary programming.
    - o The district is making strides to create more specialized, in-house programming to serve students with disabilities through the development of a dual classroom for instruction and functional living.
    - o The district has an intentional focus on students being involved in the school community and being members of the larger community. District partners are developing community relationships to create job coaching placement opportunities for students.
- Concerns
    - o Students with more significant manifestations of their disability often are not served in their home school or within district.
    - o Most students with IEPs are served through two instructional models: In-class resource (ICR) or out of class resource (OCR).
    - o District size inhibits large scale growth of an expansive least restrictive environment continuum.
    - o A decision-making matrix for determining ICR or OCR is not utilized which can lead to inconsistency in individualized student level decision making.

Program Offerings

As of the 2022-2023 school year, the district provides the following special education programs:

Grade	School/Program	School/Program	School/Program
	Lambertville Public School	**West Amwell Township Elementary School**	**South Hunterdon Regional Middle/High School**
PreK	•Integrated Preschool		
K	•In-class Resource •Learning Language Disabilities-Mild Moderate program (Grades K-2) (Autism Support)	•In-class Resource	
1	•Pull-out Resource •Learning Language Disabilities-Mild Moderate program (Grades K-2) (Autism Support)	•Pull-out Resource	
2	•Pull-out Resource •Learning Language Disabilities-Mild Moderate program (Grades K-2) (Autism Support)		
3	•In-class Resource •Pull-out Resource	•In-class Resource •Pull-out Resource	
4	•In-class Resource •Pull-out Resource	•Pull-out Resource	
5	•Pull-out Resource	•In-class Resource •Pull-out Resource	
6	•Pull-out Resource	•In-class Resource •Pull-out Resource	
7			•In-class Resource •Pull-out Resource •MS Academy (grades 7/8) (Learning Language Disabilities Mild/Moderate Program)
8			•In-class Resource •Pull-out Resource •MS Academy (grades 7/8) (Learning Language Disabilities Mild/Moderate Program)
9			•In-class Resource •Pull-out Resource •HS Academy (Learning Language Disabilities Mild/Moderate Program)
10			•In-class Resource •Pull-out Resource •HS Academy (Learning Language Disabilities Mild/Moderate Program)
11			•In-class Resource •Pull-out Resource •HS Academy (Learning Language Disabilities Mild/Moderate Program)
12			•In-class Resource •Pull-out Resource •HS Academy (Learning Language Disabilities Mild/Moderate Program)
12+			•HS Academy

			(Learning Language Disabilities Mild/Moderate Program)

According to parents who participated in the survey, many parents responded favorably toward the delivery of special education services their child receives.

Exhibit 46. Parent Survey: I am satisfied with my child's overall special education services.
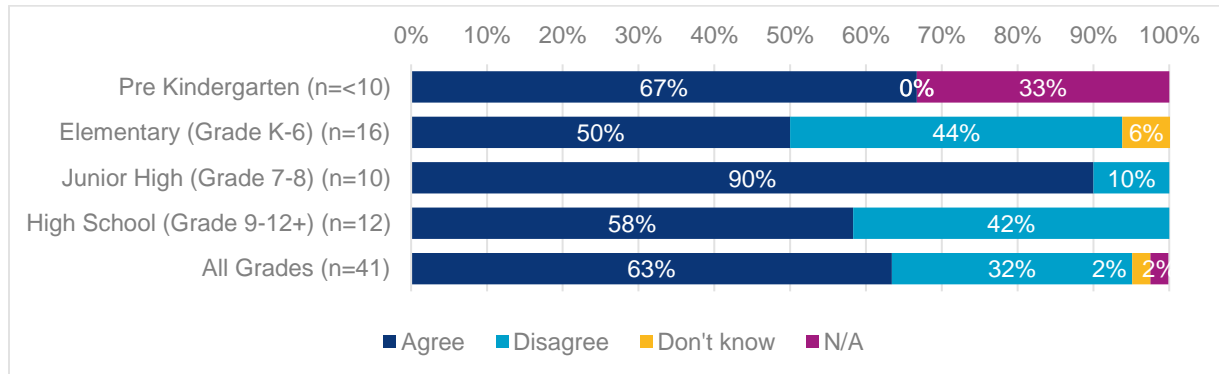
Specially Designed Instruction

In order for all students, including those with IEPs, to meet high academic standards and fully demonstrate their knowledge and skills in reading, writing, speaking, listening, and mathematics, their instruction must be flexible yet challenging and incorporate scaffolds and accommodations to overcome potential learning barriers. It is essential that the curriculum be designed to enable all students to successfully access and engage in learning without changing or reducing instructional targets. In order to meet the diverse needs of all learners in the classroom, educators must prioritize Universal Design for Learning (UDL) strategies as part of core instruction in the general education classroom, as well as Differentiated Instruction, Accommodations and Modifications, and Specially Designed Instruction (SDI) to support access and success of learners. Implementing such a varied mix of appropriate supports while maintaining the integrity of the curriculum can be challenging but is necessary to support diverse learners.

Students with IEPs often need more time to master concepts through specialized, research-based approaches according to instructional need, measured performance, and recognized disability. SDI, by definition, meets this need by adapting, as appropriate to the needs of an eligible child, the content, methodology, or delivery of instruction: (34 CFR 300.39(b)(3)).

> i. To address the unique needs of the child that result from the child's disability; and
>
> ii. To ensure access of the child to the general curriculum, so that the child can meet the educational standards that apply to all children within the jurisdiction of the local education agency.

In PCG's classroom visits, the following elements were identified as meeting the criteria for SDI in at least one classroom visit:

- Explicit Direct Instruction (pre/post instruction)
- Individualized Support

Specially designed instruction occurs through two placements in SHRSD as designated on a student's IEP: ICR and/or OCR. The limited continuum of services has resulted in service provision occurring in either or both of these settings. According to focus group and interview participants, students receiving OCR SDI often are removed from the general education classroom to receive replacement instruction, at times, resulting in little to no exposure to core instruction. While the intention as described by participants was to

ensure students work on aligned foundational skills in a small group or 1:1 environment, the limited exposure and/or rigor may result in a greater academic performance divide between students with disabilities in OCR and their non-disabled peers. It is important the district continue to consider scheduling opportunities for students with disabilities to be removed for part of the general education lesson in lieu of spending most instructional time outside of the classroom with the majority of non-disabled peers.

In SHRSD, staff shared the following through the survey:

Forty-nine percent of respondents disagreed that SHRSD has established standards for delivering co-teaching or collaborative instruction.

Exhibit 47. Staff Survey: SHRSD has established standards for delivering co-teaching/collaborative instruction.
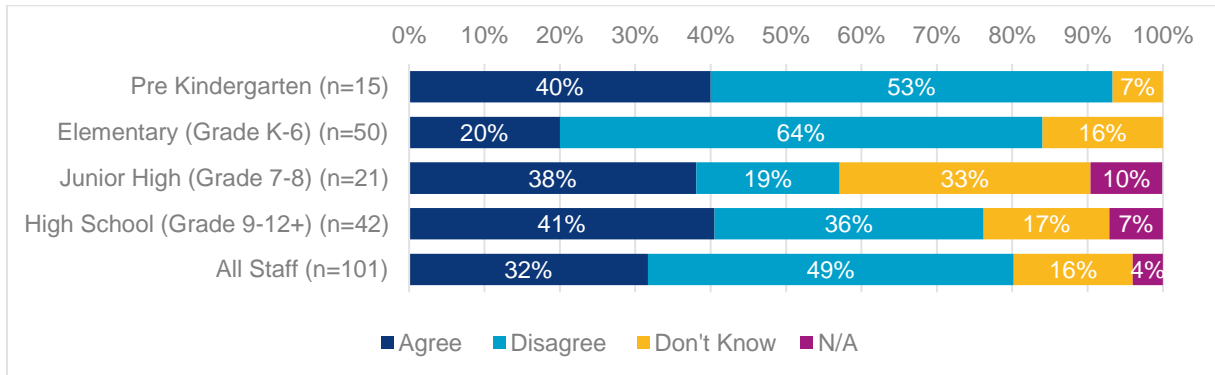
Forty-seven percent of respondents disagreed that there is sufficient communication between general and special educators about the needs and progress of students with IEPs.

Exhibit 48. Staff Survey: There is sufficient communication between general and special educators about the needs and progress of students with IEPs.
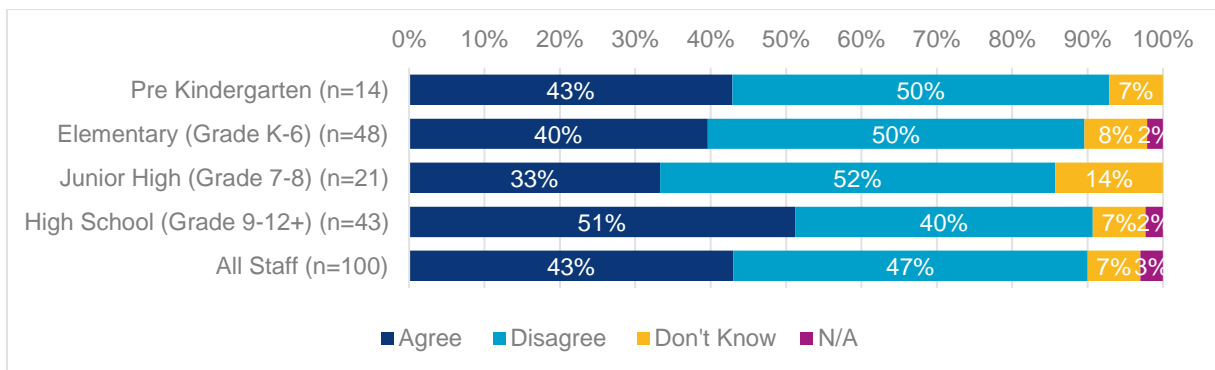
Forty-nine percent of respondents disagree with the statement that staff in their building are provided adequate time and coverage to develop IEPs. Twenty-four percent of survey respondents indicated that they did not know if staff in their building are provided adequate time and coverage to develop IEPs.

Exhibit 49. Staff Survey: Staff in my building are provided adequate time/coverage to develop IEPs.

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

Category	Agree	Disagree	Don't Know	N/A
Pre Kindergarten (n=15)	27%	53%	13%	7%
Elementary (Grade K-6) (n=51)	24%	63%	10%	4%
Junior High (Grade 7-8) (n=21)	25%	25%	45%	5%
High School (Grade 9-12+) (n=43)	24%	31%	43%	2%
All Staff (n=103)	24%	49%	24%	4%
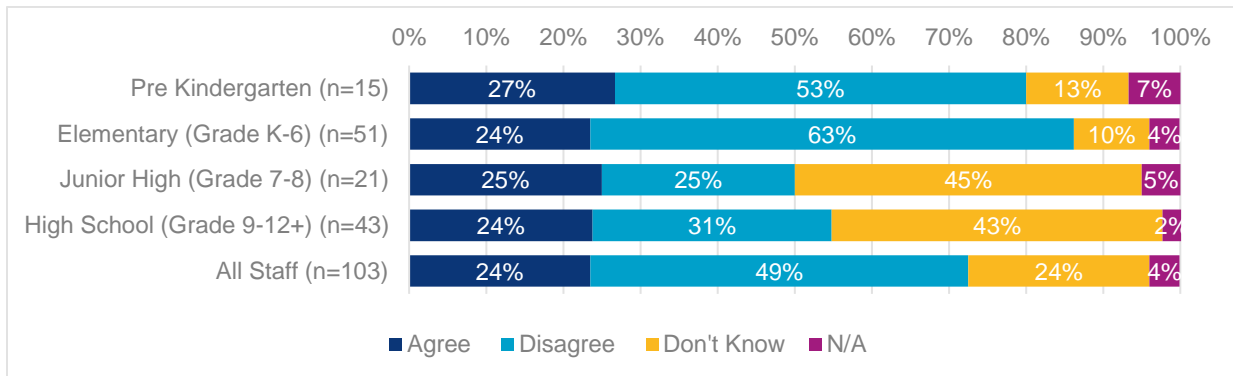
Twenty-eight percent of respondents shared that general education teachers are provided adequate training in effectively support the needs of students with IEPs.

Exhibit 50. Staff Survey: General education teachers are provided adequate training in effectively supporting the needs of students with IEPs.

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

Category	Agree	Disagree	Don't Know	N/A
Pre Kindergarten (n=15)	20%	53%	27%	
Elementary (Grade K-6) (n=51)	20%	67%	12%	2%
Junior High (Grade 7-8) (n=21)	33%	43%	24%	
High School (Grade 9-12+) (n=42)	36%	45%	19%	
All Staff (n=102)	28%	56%	15%	2%
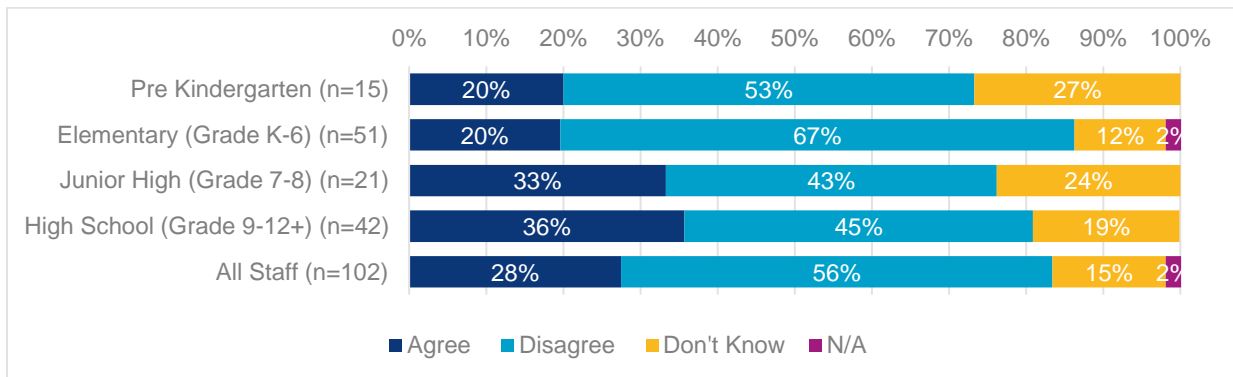
Sixty-nine percent of Elementary survey respondents reported they agree that they are confident in how to implement IEPs as written; compared to 62% of middle school respondents who agree they are confident in how to implement IEPs as written.

Exhibit 51. Staff Survey: I am confident in how to implement IEPs as written.

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

Category	Agree	Disagree	Don't Know	N/A
Pre Kindergarten (n=15)	67%	27%		7%
Elementary (Grade K-6) (n=51)	69%	26%	2%	4%
Junior High (Grade 7-8) (n=21)	62%	24%	5%	10%
High School (Grade 9-12+) (n=42)	69%	24%	2%	5%
All Staff (n=101)	70%	23%	2%	5%
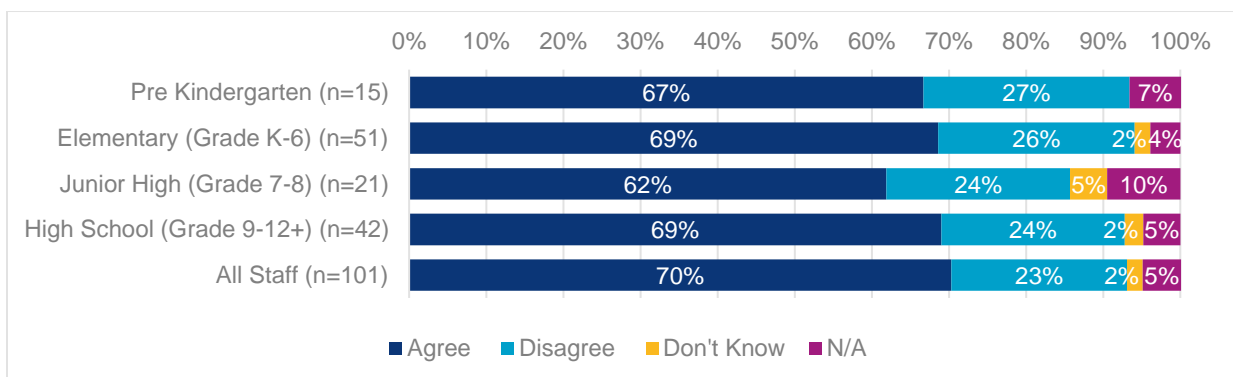
Fifty-nine percent of survey respondents agree that special education teachers at my school are used effectively to support the needs of students with IEPs.

Exhibit 52. Staff Survey: Special education teachers at my school are used effectively to support the needs of students with IEPs.
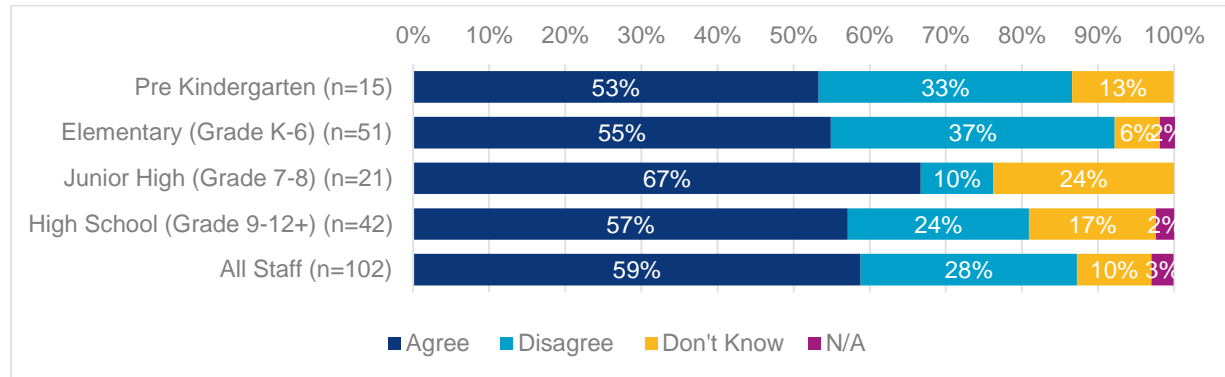
Inclusive Practices in SHRSD

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 supports from the prior concept of "mainstreaming."[62] The practice of mainstreaming involved students with disabilities in general education classrooms without the support they needed to be successful.[63] It is important to note that the mainstreaming term was used shortly after the special education law was first implemented (1978) and special education was viewed as the "place" where students learned. Through the reauthorizations of IDEA and as special education expertise grew, special education is no longer considered to be a place of instruction but rather a constellation of instructional modalities, including those that are specialized. The concept of inclusive instruction has grown to the idea of supporting the learning of students with IEPs along with their typical peers through UDL, differentiated instruction, collaborative teaching, and co-teaching.

According to data gathered from focus groups and interviews, the SHRSD special education leadership and staff have adopted many inclusive practices to promote the well-being and success of students with disabilities. This perspective is supported by SHRSD staff survey data. Overall, 90 percent of staff survey participants agree that their school provides an inclusive environment for students with disabilities. That is one of the higher overall agreement ratings in data collected as part of this study.

SHRSD staff provided resounding narrative support in the staff survey echoing the importance of inclusivity and a growth mindset in the district:

- "I believe the school I am a part of at South really supports and positively grows because of our inclusivity!"
- "I think the school and district staff overall have great intentions in regards to wanting to help every child and wanting every student to succeed! Our district goes above and beyond when you think of kindness and inclusivity. Everyone's heart is in the right place."
- "There's a willingness to foster inclusion."
- "Our district is very inclusive in their special education programming."

Analysis of the parent survey responses from this study supports the perspective that most individuals across the organization are embracing inclusion and practices to support inclusion. Approximately 83% of parent respondents indicated they agree their "child is a valued member of the school and is generally included in all academic and extracurricular activities."

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[62] New Jersey Coalition for Inclusive Education: https://www.njcie.org/about-inclusive-ed
[63] id.

As a district, SHRSD has laid the foundation for inclusive practices in a number of buildings as demonstrated by staff feedback in surveys and focus groups. District leadership must continue to unify all schools to promote inclusive practices. All students with disabilities deserve consistent inclusive experiences and access to the core instruction in order to drive academic growth, regardless of building assignment or special education programming.

PCG documented the evidence based and promising practices in special education observed during the classroom visits. The aggregated results indicated that there were a variety of general instructional practices and approaches that are rooted in research and which occurred frequently across the general education classrooms. Some of these included:

- Consistently safe and accessible environments to promote student engagement
- Well defined behavioral expectations within the classrooms
- Elements of Universal Design for Learning
- Use of Para-educators to support instruction and behavior management

Regarding specific practices that have been known to assist students with special education needs, it was less evident and was not frequently observed during the classroom visits. These special education practices included: 1) Use of data collection procedures, 2) Use of assistive or instructional technology, and 3) Various co-teaching models.

Collaborative-Consultative Model

Within a well-structured Collaborative-Consultative Teaching Model, the special education teacher serves in a variety of roles as a strategy expert in partnership with the general education teacher. In other words, it is a special education service option in which special and general educators demonstrate ongoing collaboration and decision-making regarding the instructional needs of students with disabilities through pooled resources and joint accountability. Most often, the general education teachers are responsible for content expertise, and the special education teachers adapt that content for individual learning styles and abilities based on the students' IEP.[64]

Under this model, students learn primarily in the general education classroom and are not removed for long periods of time in a resource room replacement for additional instruction or support. However, special education and general education teachers have the flexibility to meet the individualized and evolving needs of students with disabilities. Special educators have a caseload of students across classrooms and/or teachers. The special educators are responsible for providing the specialized supports needed by each student. Unlike the more static model of full-time resource room or self-contained classroom, in this model the special educator, in collaboration with their general educator partner, determines the daily/weekly level of support needed for the student in response to the changing demands of the curriculum and instruction. [65]

The special educator employs varying SDI modalities available in a flexible schedule. This schedule may include small group or individual direct instruction within or outside the general education classroom; monitoring of students within the general education classroom; traditional models of co-teaching (including in-class support); modifications and adaptation to general education curriculum and instruction; teacher consultation; and technical assistance.

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[64] PCG's 'Best Practices in a Collaborative-Consultative Model' was developed in 2021 by its subject matter experts in partnership with Dr. Jerry G. Petroff, Professor of Education in the Department of Special Education, Language and Literacy at The College of New Jersey (TCNJ).
[65] Eisenman, L.T., Pleet, A.M., Wandry, D., McGinley, V., (2011). Voices of special education teachers in an inclusive high school: Redefining responsibilities. Remedial and Special Education 32(2) 91-104. Sage Publishing.

Co-Teaching in SHRSD

The co-teaching structure within SHRSD was described in a variety of ways. It is important to note that both terms, ICR and co-teaching, were used interchangeably by SHRSD staff across focus groups, interviews, open-ended survey data, file reviews, and observations. Also, "co-teachers" were also referred to as "resource teachers" anecdotally in focus group and interview conversations. The inconsistency of structures and understanding of expectations for an in-class resource or co-teaching model throughout the district is a challenge and leads to confusion, as noted by survey and focus group participants. The following preliminary themes were identified as part of this analysis:

- There is a lack of shared vision for co-teaching.
- Co-teaching expectations are highly variable by building and teaching teams.
- A lack of consistent and cohesive practices leads to confusion on how best to implement co-teaching models.
- Scheduling has a significant impact on co-teaching team's ability to collaborate and plan.

In previous years, SHRSD pursued a series of professional development sessions to promote inclusive practices, including a collaborative or co-teaching approach to instruction. The district's implementation of the models has evolved over time. SHRSD focus group participants highlighted how that evolution has impacted their campus-level practice:

- The co-teaching model, by grade level and by building, can be different in structure and practice.
- Teaching staff who have never co-taught before and have not received any formal training.
- Teams are working together to learn through the challenges and the experiences of co-teaching.
- SHRSD staff are actively pursuing resources (buying books, researching, learning, outside of work time).

The willingness to utilize as many personal and professional resources as possible to mitigate the co-teaching barriers speaks to the resiliency of the SHRSD staff. It was evident that SHRSD staff take pride in going above and beyond to support students with and without disabilities. This is consistent with narrative staff survey responses consistently advocating for more time so co-teachers can become experts in their craft.

The Office of Curriculum and Instruction is piloting the addition of two Instructional Coaches. These coaches can provide support to co-teaching pairs; however, scheduling challenges plague collaborative planning opportunities critical to successful co-teaching. In addition to staffing, district administration have partnered with an outside agency to address complicated Master Scheduling challenges. This stratified approach should yield positive impacts to promote co-teaching. It is critical that the consistency in language, structure, and allocation of collaborative teaching models throughout the district remains a priority for SHRSD.

Supplemental Study in SHRSD

SHRSD offers a course known as Supplemental Study in grades 7 through 12. As designed, it is intended to function as an elective-type class offered at the middle/high school campus exclusively for students with disabilities. Supplemental Study is intended to focus on the development of executive functioning skills and to support students in the implementation of academic study skills, as reported by district administration. According to administration, it was designed to mirror a collaborative-consultative teaching model.

Through information gathered from interviews, focus groups, and classroom visits, participation in Supplemental Study is determined by students' IEP teams. However, through interviews and classroom visits, it was gathered that Supplemental Study is inconsistent in its implementation, specifically around the consultations with students and alignment of these consults with students' IEPs. It was noted during the qualitative data gathering process that Supplemental Study can be influenced by scheduling when considering if students need a "break" in the day versus utilizing Supplemental Study as a curricular opportunity. During PCG's classroom visits, inconsistent practices occurred – some teachers engaged with

students whereas others did not. In addition, it was not clear if students were on task. For example, in some classes, it was apparent students were using their phones in lieu of doing classwork. PCG did not see data collection occurring during its visits.

Within SHRSD, formal district guidance on the implementation of Supplemental Study does not currently exist. During interviews and focus groups it was learned there was a common belief that Supplemental Study has evolved over time into a course more closely compared to study hall.

According to district administration, Supplemental Study was originally led by special educators; however, that has transitioned into a model led by general educators with support from teaching assistants. No formal curriculum or guidelines have been established and disseminated to district staff regarding the vision for Supplemental Study, specifically around its purpose in supporting IEP goals and how data is collected to ensure the time is used to promote students' IEP goal acquisition. The absence of clear guidance and expectations has impacted both program structure and practices for students with disabilities.

The inconsistency in implementation was acknowledged by focus group and interview participants. For example, students enrolled in Supplemental Study at the middle school level will receive a "pass/fail" designation when compared to high school receiving a letter grade. The ambiguity of Supplemental Study creates inherent discrepancies in how a student could be subsequently "graded" for participation as implementation is highly variable. The intention for students to work on homework has the potential to be an invaluable offering. It was noted though that often students do not have sufficient homework or project-based work for Supplemental Study resulting in challenging behavior and student disengagement in the classes.

Participation in Supplemental Study may be a barrier for students with disabilities attending technical school in 11th and 12th grade as student schedules may not consistently account for both programming options. That may have a direct impact on future post-graduation opportunities. Similarly, Supplemental Study occurs simultaneously with elective courses. It was noted as a key finding in this evaluation that students with disabilities have advocated wanting to participate in electives and feeling frustrated that opportunity is not afforded to them. Not having equitable voice in designing a course of study may potentially be leading some students to utilize their time in Supplemental Study to meet their preferences, such as drawing in a sketchbook when wanting to participate in Art with non-disabled peers. This decision, particularly when made outside of a student-centered process for designing a courseload, may have detrimental effects to students with disabilities being given equitable voice and the opportunity to succeed.

Utilization of Paraprofessionals in SHRSD

In New Jersey, a paraprofessional is considered a non-certified instructional staff person who does not hold the position of teacher but assists in the classroom under the guidance of a teacher. This has been articulated since the No Child Left Behind Act of 2001 and has remained the same since the 2017 reauthorization of ESSA. Locally, sometimes paraprofessionals are called teacher aides or instructional aides.[66] When it comes to supporting the needs of students with disabilities, paraprofessionals may provide supplementary support to a student or students in areas including, but not limited to:

- Prompting, cueing, redirecting student participation;
- Reinforcing of personal, social, behavioral, and academic learning goals;
- Organizing and managing materials and activities; and
- Implementing teacher-directed follow-up and practice activities.[67]

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[66] NJDOE Highly Qualified Staff, https://www.state.nj.us/education/title1/hqs/pp/ppfaq.shtml
[67] Effective IEP Decision-making, NJDOE, 2015-16.
https://www.nj.gov/education/specialed/idea/lre/year1trainings/7/IEPDevDecisionmaking.pdf and N.J.A.C. 6A:14-4.5(b)

Paraprofessionals play an important role in providing some students with disabilities access to the Least Restrictive Environment. This is especially true for the following needs, all of which were reiterated by SHRSD administrators, staff, and paraprofessionals as activities that are occurring in the district:

- Student needs assistance in self-care (e.g. toileting, feeding, dressing, mobility).
- Student needs intensive assistance in the area of communication support.
- Student behavior poses a significant disruption in the classroom.
- Student behavior poses a direct discernible safety risk to him/herself or others.
- Student needs intensive, ongoing support in vital areas (e.g. academics, functional skills, re-direction to benefit from instruction).[68]

Within SHRSD, paraprofessionals are utilized in a variety of capacities. Individuals in the role serve as facilitators for social interactions and provide supplemental instruction for students with and without disabilities. SHRSD paraprofessionals reported serving in their respective roles for many years, some as long as double digits (10+ years). There is minimal turnover in this position, which is remarkable considering that is not the experience of most school districts throughout the country.

It is a unique opportunity for the district to retain support staff with tenure and historical knowledge of instructional practices. The addition of paraprofessional support to a student's IEP is conducted on an individual basis. A decision-making matrix does not guide this IEP team conversation. The district should consider the development of and subsequent training in making this decision. It is important for SHRSD paraprofessionals to be consulted in this process and they can best advocate for their role in practice.

Focus group participants identified competing perspectives in the utilization of paraprofessionals in SHRSD. District practices dictate the addition of adult support on a student's IEP to promote inclusion; however, that inherently creates a more restrictive scenario. Student needs for socialization or instructional support are not always best addressed with the addition of a paraprofessional. However, paraprofessionals were also considered invaluable members of the classroom community to support inclusive practices. Staff survey responses to the statement "Paraprofessionals at my school(s) are used effectively to support the needs of students with IEPs" also indicates dichotomies.

Exhibit 53. Staff Survey: Paraprofessionals at my school(s) are used effectively to support the needs of students with IEPs.
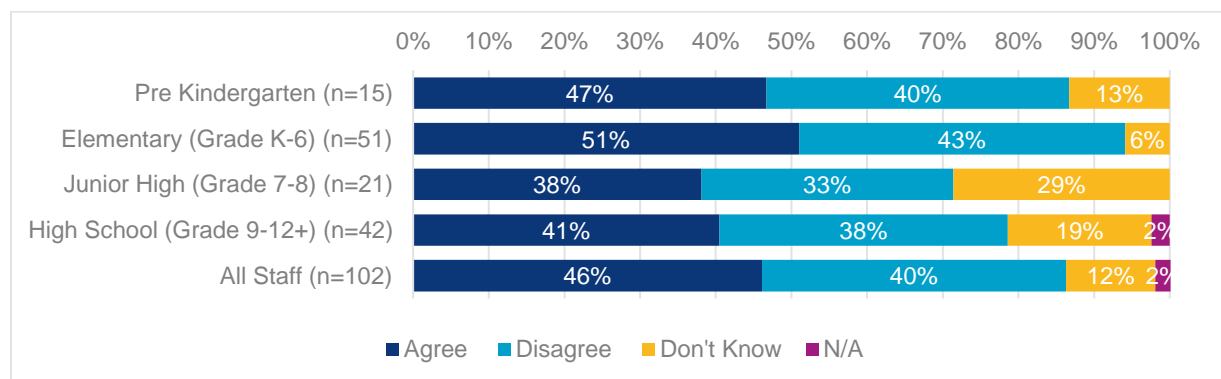
During the PCG observations, paraprofessionals were observed to be active and engaged members of the classroom. The role appeared different in practice across classrooms with some paraprofessionals appearing more confident in their ability to navigate instructional dynamics. There did not appear to be a lack of willingness to support students, rather a lack of clarity in how to best serve in this role. Approximately,

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[68] NJDOE ESSA Requirements for Title I Paraprofessionals can be accessed at:
https://www.state.nj.us/education/title1/hqs/pp/ppfaq.shtml

36% of staff survey respondents agree that "there is sufficient communication between special educators and paraprofessionals about the needs and progress of students with IEPs."

Exhibit 54. Staff Survey: There is sufficient communication between special educators and paraprofessionals about the needs and progress of students with IEPs.
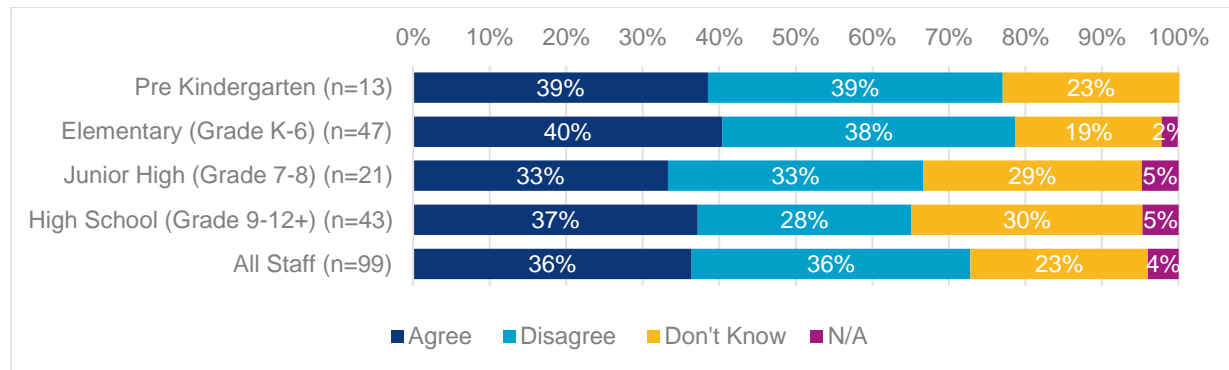
Access Advanced Courses and Extra Curriculuar Activities

It is recognized that students with IEPs have a disability that may significantly hinder their ability to benefit from general education. As such, students with IEPs require supports and accommodations to meet high academic standards and to fully demonstrate their conceptual and procedural knowledge and skills in ELA (reading, writing, speaking and listening) and math. These supports and accommodations should ensure that students receive access to multiple means of learning and opportunities to demonstrate knowledge, but retain the rigor and high expectations of the New Jersey Student Learning Standards, and include the following elements:

- Instruction and related services designed to meet the unique needs of these students and to enable them to access to the general education curriculum;

- Teachers and specialized instructional support personnel who are prepared and qualified to deliver high-quality, evidence-based, individualized instruction and support services;

- Instructional supports for learning that are based on the principles of Universal Design for Learning (UDL)

- Instructional accommodations that reflect changes in materials (e.g., assistive technology) or procedures that do not change the standards but allow students to learn within the NJSLS framework.

It must also be made clear that these supports and accommodations are intended for all courses offered in a school district, and do not preclude accelerated courses. According to a Dear Colleague Letter by the US Department of Education, as part of a child's Free and Appropriate Education under IDEA, "…if a qualified student with a disability requires related aids and services to participate in a regular education class or program, then a school cannot deny that student the needed related aids and services in an accelerated class or program."[69]

The perception exists that most students in higher level learning classes in SHRSD are White, general education students. According to focus group participants, no students with disabilities are participating in Honors or AP courses during the 2022-23SY and the perception exists that these courses may be inadvertently gatekept. Participation in Honors or AP courses is contingent upon recommendations from teaching staff. It was reported by focus group participants that teachers may be limiting students with disabilities accessing higher level learning courses by not making recommendations or unconscious biases. Specifically, teaching teams are concerned with placing students with IEPs in advanced level classes out

[69] Dear Colleague Letter: Access by Students with Disabilities to Accelerated Programs, December 26, 2007, https://www2.ed.gov/about/offices/list/ocr/letters/colleague-20071226.html.

of fear of failure. Both logistical and growth mindset barriers must be addressed to begin shifting this culture. The creation of an open access model combined with scheduling practices to "push-in" supports will empower students with disabilities to be successful in advanced courses rather than prevent participation all together.

High Quality IEPs to Support a Student's Individualized Program

Golden Thread Framework

PCG reviewed approximately 15 student IEP files, independent of the focus group, to assess the overall quality of the content of IEPs developed by SHRSD. Files reviewed were selected based on students' primary disability category, school, gender, grade, and language status (English Language Learner students with a disability). No numerical value was assigned to each file when compared to the indicators below. A narrative summary is included as evidence for each indicator. While SHRSD is continuing to clarify and standardize procedures, these data reflect IEP documents reviewed in the fall of 2022 and winter of 2023.

For a student with a disability, his or her CST/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. PCG used the Using the Golden Thread framework and Quality Indicator Review protocol in its review of IEPs for this Purpose.

Exhibit 58. PCG's Golden Thread Framework
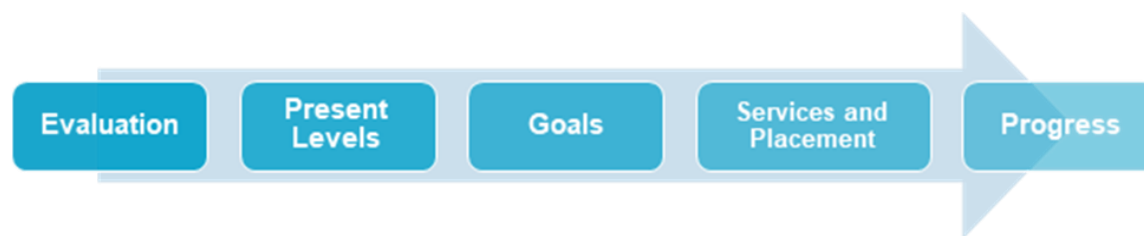
Evaluation - What are the student's characteristics as a learner? What is his/her documented disability? How do the evaluation results inform an instructional plan?

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 how frequent? 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 student access, participation and progress in the general education curriculum and address a student's other disability needs.[70]

PCG used five overarching quality indicators to assess files. The rubric included specific "look-fors," or classifications of evidence, under each indicator.

Exhibit 55. 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 performance (PLP); 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

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[70] The Quality Indicators are based on the New York State of Education (NYSED) "Quality Indicator Review and Resource Guide": http://www.p12.nysed.gov/specialed/techassist/CSE-IEP.htm

	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.

Quality Indicator Review Findings

A summary of these coded comments by area are included below.

Evaluation, including the Eligibility Summary

- A variety of assessment tools were utilized to determine initial eligibility.
- The evaluation narrative data, at times, lacked relevant, current, or specific data about the student. For example, a student was identified as eligible for special education services under the disability classification "Specific Learning Disability" during a re-evaluation meeting in 2022. The last cognitive and educational testing referenced in the IEP document was from 2016.
- Re-evaluations with updated testing every 3 years is not a consistent practice. For example, a re-evaluation meeting to determine ongoing eligibility is referencing assessment results that range from 3-5 years old under the section of the IEP labeled "Initial or Most Recent Evaluations/Reports."

Present Levels of Academic and Functional Performance (PLAAFPs)

- Narrative PLAAFP data referencing classroom-based performance included both quantitative and qualitative measures.
- PLAAFPs referenced data sources and evaluation results that were up to 6 years old. In one instance, data cited in the PLAAFPs included evaluation results from 2017 for a meeting conducted in 2022. No new assessments were conducted for the re-evaluation in 2020, and the same assessment results were referenced for the next two annual IEP meetings.
- Overall, parent comments were brief, or the section indicated that parents had no concerns.

Measurable Annual Goals

- IEPs reviewed included baselines, objectives, and goals; however, goals and objectives did not consistently address areas of need identified in the body of the IEP. In one instance an IEP was reviewed for a student with behavioral concerns, yet all goals were academic in nature.
- Goals were consistently written in a SMART (Specific, Measurable, Attainable, Results-Oriented, and Timebound) format.

Services and Placement

- Most IEPs reviewed designated either ICR or OCR for comparable amounts of time.
- Related Services added to the IEPs appear to be in alignment with student need.

Progress Reports

- Across most progress reports reviewed, an acronym is assigned to indicate the level of progress made.
- General comments did not consistently include information to determine how progress is being achieved from the implementation of recommended strategies. Overall, the general comments were brief and inconsistent. The lack of "General Comments" makes contextualization incredibly difficult and could possibly limit the parent's understanding of the specific goals and/or objectives.
- Overall, there was a lack of consistency in reporting progress for students that demonstrates clear district expectations.

Overall Comments

- A common theme across most files reviewed, particularly for students whose eligibility needs to be redetermined through a re-evaluation, updated standardized assessments were not administered.
- IEP goals and objectives were appropriately ambitious, written in the SMART format.
- Due to the limited LRE continuum, there is minimal feedback on placement. Related services appeared appropriately determined.
- Progress monitoring reports lacked narrative, contextual feedback regarding a student's progress.

Early Childhood Supports and Services

SHRSD offers an integrated preschool program for young students with disabilities. In 2022, SHRSD expanded enrollment for 3-and-4 year olds to 3 in-district classes through a Preschool Expansion Award (PEA) award. PEA is a statewide New Jersey initiative to expand access to state-funded, high quality Pre-K programs. SHRSD was awarded $303,072 as part of this expansion opportunity.[71] The *New Jersey Strategic Plan for Preschool Expansion Phase 1: The Foundation"* highlights the following policy considerations:[72]

- "Financing and Scaling to Universal Access: Considerations for enrollment targets and funding of the proposed expansion of preschool set the stage for the considerations provided in each of the following sections.
- Facilities: Research-based considerations for minimum facilities standards for preschool classrooms and considerations for development of the capacity to meet preschool expansion goals.
- Workforce: What is known about the current early childhood workforce and capacity to meet the needs of a growing program with considerations for increasing the number of qualified preschool teachers and ensuring adequate and fair compensation for all teaching staff.
- Mixed delivery: Childcare centers and Head Start working in partnership with public school districts are essential to secure the workforce and facilities needed to expand preschool throughout the state while ensuring the availability of childcare beyond school hours. Considerations focus on strengthening this mixed delivery system that are critical to New Jersey's preschool success to date."

The investment and roll-out of expanded Pre-K will be instrumental in creating more inclusive opportunities for young children with disabilities in SHRSD. Currently, a young child with disability is eligible to be considered for a general education placement if they meet eligibility requirements for Pre-K. Should a young child with disability whose most appropriate LRE would be general education can access specially designed instruction in a co-taught general education preschool classroom during the 2023-2024 school year.[73]

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[71] https://www.tapinto.net/towns/morristown/sections/government/articles/governor-murphy-announces-2-7-million-in-preschool-expansion-aid
[72] https://www.nj.gov/education/earlychildhood/docs/NewJerseyStrategicPlanforPreschoolExpansionPhase1-TheFoundation.pdf
[73] https://go.boarddocs.com/nj/shrsd/Board.nsf/files/CLEJTC4EB493/$file/FinalM(UA)%20AnnualPreschoolOperational%20PlanUpdate1.2022a.docx-merged.pdf

As district-level staff establish expectations for collaboration between general and special educators in early childhood classrooms, it will be critical that campus-based staff can fluently speak to how students with disabilities will be meaningfully included in general education classrooms. The staffing structures at the classroom level should include consideration of how students with disabilities will be supported for both social and instructional opportunities.

Transition Goals

In New Jersey, IEP teams begin creating Transition goals, as required by IDEA, at age 14. According to the New Jersey Department of Education: "Transition is a formal process of long-range cooperative planning that will assist students with disabilities to successfully move from school into the adult world. High quality transition planning and services will enable students with disabilities to pursue their desired postsecondary goals. The following resources are intended to assist schools, families, students, and others in understanding what to do for successful transition to happen, and how to do it."[74]

According to administration, the following are components of SHRSD' transition programming:

- Students advocate for their post-secondary opportunities
- CST team members are actively involved and partner with students and their parents
- There is a focus on expanding community-based instruction for transitioning students

Parents of students with disabilities expressed concerns with their post-secondary transition experiences. Specifically, citing feeling unprepared to navigate the complexities of adult disability services and frustrated with the lack of district support. Approximately, 42% of parents who responded to the survey indicated agreement with the statement "the IEP team identified transition services to help my child." Half of the same survey respondents disagreed that their child's transition plan is preparing them for life after high school.

Exhibit 56. Parent Survey: The IEP team identified transition services (for example, community service, independent living skills, etc.) to help my child.
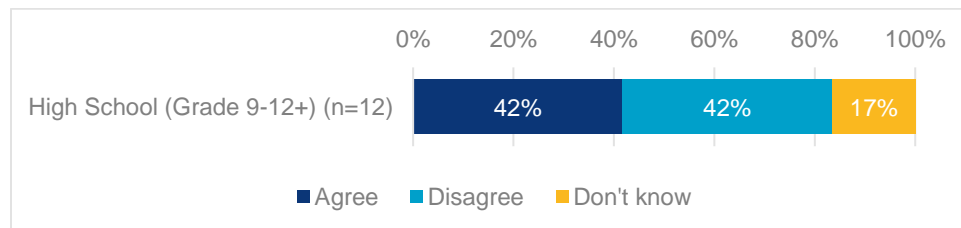
Exhibit 57. Parent Survey: My child's transition plan is preparing them for life after high school.
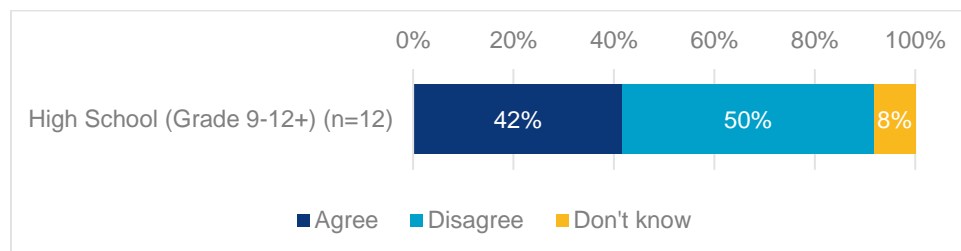
Summary and Implications

It is evident that SHRSD leadership must continue to create a shared culture of responsibility for all student achievement across all campuses. Inconsistencies in special education processes and procedures, apparent as differing practices across buildings that predate regionalization, have resulted in students with

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[74] https://www.nj.gov/education/specialed/transition/

disabilities having highly variable experiences. For example, the lack of guidance in how placement and service hour decisions are made could theoretically mean the difference between a student supplemental instruction entirely outside of the general education setting or an inclusive opportunity with specialized instruction provided in the general education classroom for students with disabilities.

SHRSD prioritizes inclusion of students with disabilities through the implementation of various instructional models across all grade levels. However, at the same time, as learned through interviews and focus groups and witnessed during classroom visits, the district has not championed the use of teaching strategies to support robust supplementary instruction. In particular, the district leverages a collaborative teaching model, Supplemental Study, at the middle and high school level. This model has not adhered to best practices that promote general education teacher/special education teacher partnerships and frequent collaboration. Subsequently, this has created learning environments that are "supplemental" in name, but in reality, are not consistently addressing executive function and academic skills, all the while being taught by general education instructors who are not trained to support the needs of students with disabilities. In these settings, PCG saw general education teachers making concerted efforts (but struggling) to support the unique learning needs of students with disabilities. Under such circumstances, the district's intent to focus on necessary skills has not fulfilled the true vision of Supplemental Study, which includes programmatic guidance and staffing necessary for all students to succeed. Although teachers repeatedly reported an intention for students with disabilities to succeed these settings struggle to promote a growth mindset. Instead, these classes reinforce the idea that students with disabilities require restrictive programming to focus on skills that are not being addressed, undermining self-advocacy, and stunting academic optimism. These circumstances can change with a districtwide will and intent to better understand critical teaching and learning needs and to address them expeditiously.

VI. SPECIAL EDUCATION LEADERSHIP, PROCEDURES, AND COMPLIANCE

Strengths	Opportunities
- Expressed commitment to establishing consistent policies and procedures for special education programming. - No Office of Civil Rights complaints filed in the last 2 years. - No New Jersey Department of Special Education complaints filed in the last 2 years. - No Due Process complaints filed within the last 2 years.	- Special education leadership changes resulting in struggling initiative implementation and consistency in vision. - No formal, written special education standard operating procedures created and agreed upon by District executive leadership to guide SHRSD practice.

Special Education Leadership

The Department of Special Services is charged with ensuring that students with IEPs have a free and appropriate education. With a responsibility that requires the consistent implementation of federal and local mandates, the Director of Pupil Services, within this department, is tasked with important, yet sometimes competing, responsibilities – respecting the site-based leadership within each school while also promoting practices to improve the outcomes of students with disabilities and ensuring the consistent adherence to the law.

At the start of the 2022-2023 school year, a new Director of Pupil Services was appointed to the position. Focus group participants shared that this change in leadership is met with excitement and hope. The district has endured a series of leadership changes within this role, particularly from a part-time supervisor of special education several years ago. The changes in leadership have left some SHRSD staff feeling frustrated at times when new initiatives are rolled out with minimal traction before the individual leaves the role.

While the department has made positive inroads with how it interacts with campus-based staff, some still see a disconnect between the vision for special education and the reality of teachers' daily experiences. SHRSD staff serving students with disabilities have incredible tenure and have created their own processes in the absence of district guidance and vision. Focus group participants advised that it will be important for the new Director to establish themselves as the leader with clear expectations over the coming years to shape the direction of the department.

Department of Special Services Standard Operating Procedures

In PCG's experience, highly effective special education departments have a standard operating procedure manual. This manual typically is inclusive of Board approved policies as well as state and federal code and it offers the step-by-step "how to" on policies and procedures that impact special education. It is intended as a resource for district staff, administration, and community stakeholders. It can serve as a resource for decisions relating to a child's special education program, including but not limited to identification; subsequent evaluation(s); classification; development and review of a child's IEP; educational placement of a child; annual IEP Meetings; triennial reevaluations; accommodations

protocols; and assistive technology procurement and service delivery protocols. It should provide clear definitions about district practices. In addition, it should be highly accessible, online and in a format that is easy to navigate.

SHRSD does not have a current special education standard operating procedures manual. It was reported as part of this review that the most recent special education standard operating procedures manual was developed in 2006-2007. According to district administration, it follows New Jersey Code on special education implementation. In addition, the Director of Pupil Services meets with the Child Study Teams (CST) who oversee special education procedures at each campus in SHRSD.

Office of Civil Rights Complaints

Over the past two years, SHRSD has had no US Department of Education, Office of Civil Rights (OCR) complaint.

Complaints to the New Jersey Department of Education Office of Special Education Programs

Over the past three years, there have been no special education complaints filed to the Commissioner of Education at the New Jersey Department of Education.

Due Process

Under IDEA and NJAC 6A:14, when there is conflict about a child's free and appropriate education, offered in the least restrictive environment, children and families are afforded due process rights. When families and school Districts disagree on matters related to special education they may resolve their disputes through a variety of channels, including: (1) voluntary mediation; (2) due process hearing; (3) and IDEA complaint to the NJDOE OSEP. In addition, families and school Districts can resolve matters outside of mediation and due process through legal settlements.

In addition, in New Jersey, parents and districts have access to a new program offered by the Department called Facilitated IEP (FIEP). It has two main purposes: (1) to promote student-centered IEP meetings that are conducted in a respectful and collaborative manner; and (2) to maximize District-level capacity to develop student-centered IEPs and minimize state-level procedural protections and interventions which often result from ineffective IEP meetings. FIEP Is an option for using a third-party facilitator to promote effective communication and assist the IEP team in developing a mutually agreeable IEP. It focuses on the needs of the student, the IEP process, and an agreed upon IEP document. The program is of no cost to participating families or the school district and may be initiated by either party.

Hearings and Settlements in SHRSD

Over the past two years, SHRSD has had no due process hearing filed by parents.

Summary and Implications

Consistency in special education leadership and the creation of a district-wide vision for students with disabilities in SHRSD will be transformational. Prioritizing the development, training, and monitoring strategies for standard operating procedures will eliminate existing barriers for students with disabilities. Despite foundational elements of a success special education program not being in place, SHRSD remains absent of complaints. It is critical that the district establish a special education vision and standard operating procedures to be implemented by district leadership.

VII. FAMILY AND STAKEHOLDER ENGAGEMENT

Strengths	Opportunities
• SHRSD is a small, close knit district allowing staff to create long-term and meaningful relationships with parents. • Efforts to engage parents including diversified strategies such as deploying a language translation text service to connect with parents. • Dedicated staff and the ability to form long-standing relationships with students and their families.	• Increased participation and awareness of the Special Education Parent Advisory Group (SEPAG) • No structure for parent training to ensure parents are informed of their rights and how best to advocate for their students. • Some distrustful relationships between parents of students with IEPs and district leadership/ staff.

Special Education Parent Engagement

Having a functioning Special Education Parent Advisory Group (SEPAG) is one essential ingredient to engage the families of students with disabilities. It is also required by law. According to N.J.A.C. 6A:14-1.2(h), each district board of education must ensure that a special education parent advisory group is in place in the district to provide input to the district on issues concerning students with disabilities. The New Jersey Department of Education, in partnership with the New Jersey Statewide Parent Advisory Network (SPAN), recently developed an online and printed manual on the creation, purpose, mission, and activities of a SEPAG.

It was reported during this review that SHRSD recently re-established a district wide SEPAG this school year. Several meetings have been held this year. Some parents reported feeling frustrated that the district has not prioritized maintaining the SEPAG. While changes at the special education leadership level may have contributed to this oversight, it highlights the importance of parents of students with IEPs having a forum to collectively share district expectations and knowledge. Parents noted that informal channels have been initiated to create information sharing; however, that structure while well-meaning can impact other parents having access to valuable information regarding district-wide special education policies and practices.

Based on data gathered during interviews and focus groups, parent engagement is viewed as inconsistent and variable. The district has a distinct advantage in creating a close-knit environment for parents of students with disabilities due to its size. It was acknowledged during focus groups that being relatively small allows for educators and school-based teams to strengthen relationships with students and their parents. In addition, it was also shared that with new leadership in place the district remains hopeful for parent engagement strategies, information sharing, and consistency in communication to improve.

The growing population of non-English speaking parents has represented a challenge regarding parent engagement. It was noted by district administration that Spanish speaking families have been participatory in focus groups with the Superintendent and separate board meetings (updates) via Zoom with translators. The district is continuing to navigate the cultural barriers of connecting with non-English speaking parents to provide constructive feedback. One non-English speaking parent has agreed to participate on the Superintendent's counsel. Specifically, the district implemented a new program that allows teaching teams to text through laptops with 2- way communication (preferred method of communication identified by non-English speaking families). Based upon analytics as reported by district administration, non-English speaking parents are engaged. The intention is for this programming to be

expanded beyond Spanish speaking families to all families in the SHRSD. The district has demonstrated consistent efforts to meaningfully engage non-English speaking families.

As part of this review, a bilingual parent focus group as well as a translated survey was disseminated to connect with non-English speaking parents. A variety of communication attempts were made to ensure non-English speaking parents of students with disabilities were aware and able to both access and participate. There were minimal responses received from the translated version of the parent survey and no parent participants in the bi-lingual focus group. There is a unique opportunity to rediscover parent engagement opportunities, particularly non-English speaking parents, as this is a growing population of students served in SHRSD.

According to district administration and parents of students with disabilities, there is no established mechanism for parent training related to special education. The district's website, under the "Parent Information tab, hosts extensive virtual training options (Parent Information & Family Sessions). A review of the website indicated that these trainings span a variety of topics, including: 1) college planning, 2) STEAM/STEM opportunities, 3) social emotional learning, and 4) district goals. There is an expressed interest in parent training, particularly in District policies and procedures related to the special education process and IEP implementation. A parent experience was characterized as, "because of the lack of transparency parents don't have a common understanding of what is available- to get a common footing." Creating a collaborative parent training structure within a SEPAG has the potential to address concerns regarding lack of transparency and intense advocacy efforts on behalf of parents to ensure their child's needs are being met.

According to SHRSD staff survey data:

- Over 77% of respondents agree that the IEP process involves collaboration between general education teachers, special educators, and parents.
- More than half of survey respondents (53%) believe they have not been provided with adequate training in communicating with parents of students with disabilities.
- 56% of staff reported that they "do not know" if parents have been provided adequate training to support students with IEPs at home. Consequently, only 10% of respondents agreed that parents have been provided adequate training to support students with IEPs at home.

Exhibit 58. Staff Survey: The IEP process involves collaboration between general education teachers, special educators, and parents.
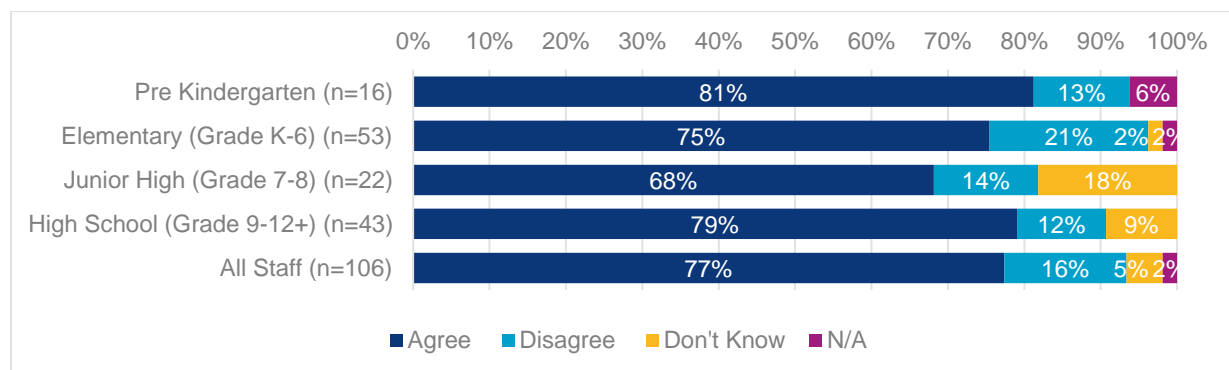
Exhibit 59. Staff Survey: I have been provided adequate training in communicating with parents of students with disabilities.
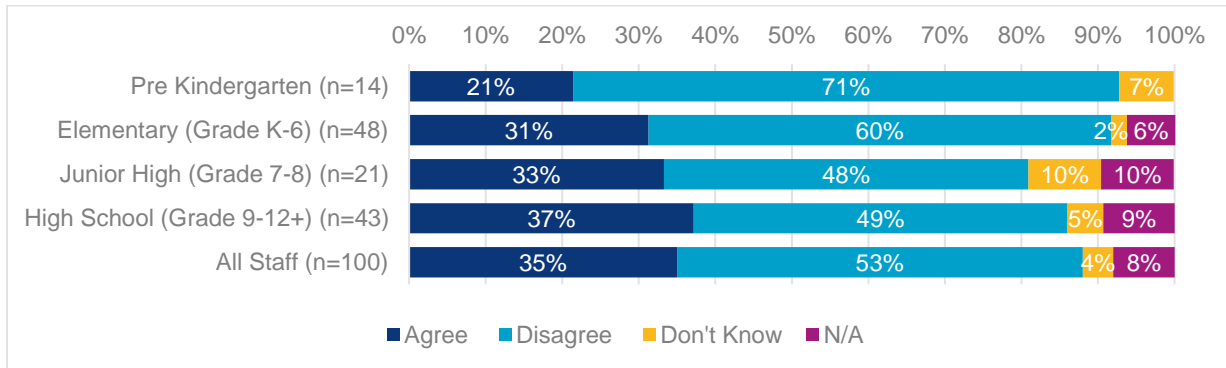
Exhibit 60. Staff Survey: Parents have been provided adequate training to support students with IEPs at home.
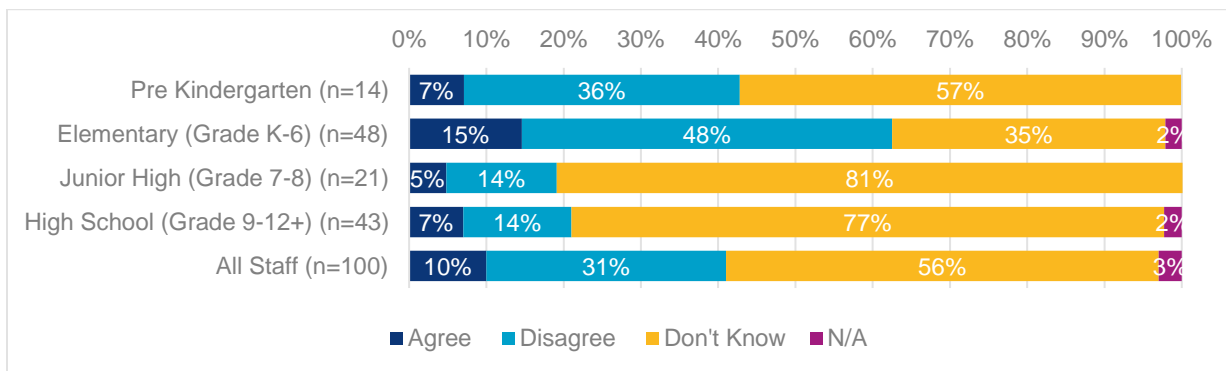
PCG hosted focus groups of SHRSD parents of students with disabilities, both in district and in out of district placements, during the review process. The focus groups were conducted virtually in the evening to accommodate parent schedules. Additionally, parents provided narrative feedback during survey completion. Several themes emerged following the analysis of the data gathered from the focus groups and narrative survey feedback:

- The district's size is a strength.
- Anecdotally, some SHRSD special education staff are perceived as kind, devoted, and working diligently to ensure student success.
- There is a lack of clarity in the special education process and parents are not given equitable voice in the IEP decision making process.
- Parents expressed having to exert considerable energy to ensure their student's needs were met.
- Limitations in the district's least restrictive environment continuum posed a challenge in meeting diverse needs of students with disabilities.
- Poor communication and lack of meaningful relationships with special education staff does not foster truly collaborative relationships between SHRSD and parents of students with disabilities consistently.

Seventy-seven percent of parents agreed that their input is considered during IEP meetings. Similarly, 84% of respondents felt comfortable asking questions at IEP meetings.

Exhibit 61. Parent Survey: My input is considered during IEP meetings.
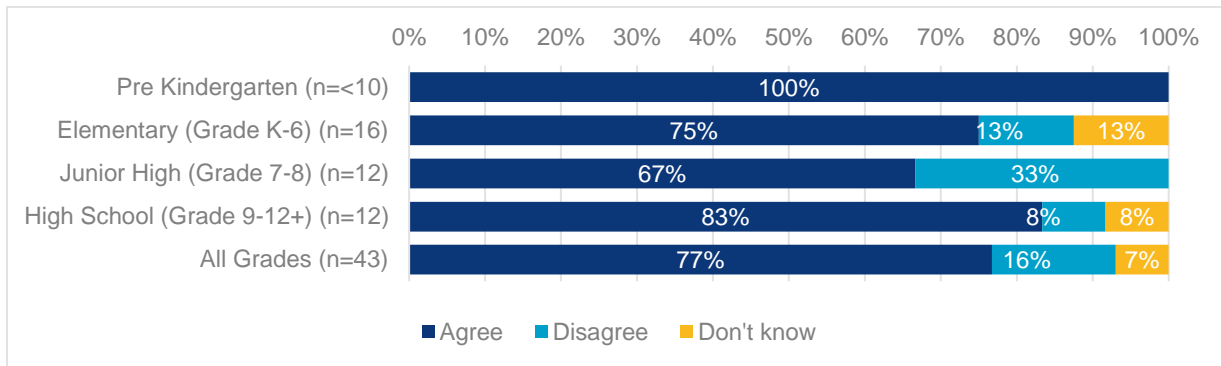
Exhibit 62. Parent Survey: I feel comfortable asking questions at IEP meetings.
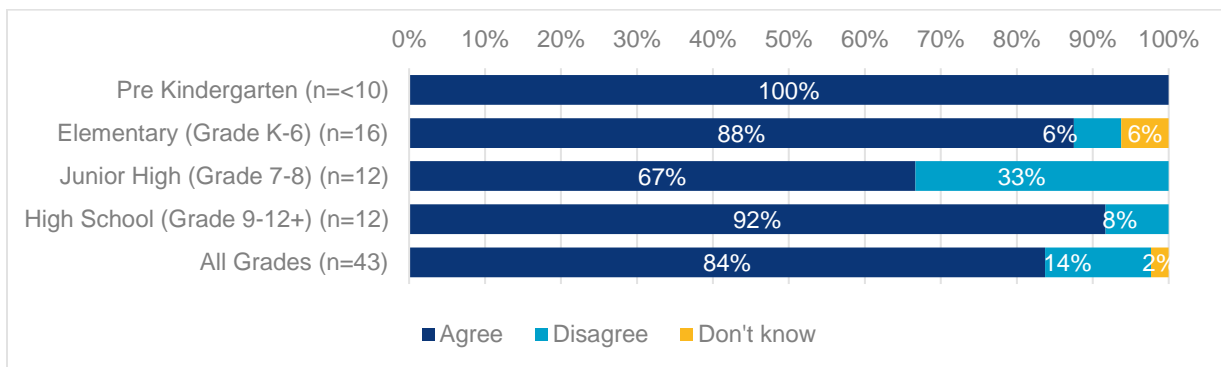
Summary and Implications

SHRSD has a great resource in the parents and families of students with disabilities. There is work that needs to be done to improve the perceptions of parents who feel excluded from their child's special education experiences, as well as sustaining engagement from those parents and families who have successfully navigated the system of services in the district. To set the stage, SHRSD will need to continue to emphasize relationship building, resources for families to better understand policies, processes, and services, and communication that strengthens the connection between school and home. These are attainable through additional support for multiple home languages, frequent opportunities for parents to interact with both their student and the learning environment (even if those opportunities take place outside of school hours, asynchronously, or synchronously), parent-friendly guidance documents, and a well-communicated, accessible schedule of training offerings for families of students with disabilities.

Current efforts to engage parents of emerging bilingual students can be strengthened by building on existing resources by identifying community organizations, peer parent, and professional service connections in anticipation of meeting needs in languages that are increasing in the district and surrounding communities. SHRSD should continue to create linguistically accessible spaces for parents of emerging bilingual students to provide feedback, particularly smaller groups, community settings, parent co-leaders and facilitators, and multiple options for day and time.

VIII. HUMAN RESOURCE INVESTMENT AND RESOURCE ALLOCATION

Strengths	Opportunities
• The district is not experiencing a staffing crisis comparable to most other districts throughout the country. One open position- paraprofessional. • Strong sense of community fostering tenure and long-standing positive relationships between students and staff. • Extensive PD offerings addressing differentiation for diverse learners.	• Vision and implementation strategies for the role of CSTs in IEP development processes in partnership with special and general educators. • Inconsistent model for staffing allocation or caseload balancing.

Human Resource Investment

Human Resource Investment highlights the processes involved in investing in people from recruitment to retirement. All school districts, SHRSD 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 resource planning, including an analysis of the extent to which the review team found evidence of organizational structures supportive of special education initiatives, high-quality professional learning, staffing needs including a breakdown of staff-to-student ratios (caseloads).

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."[75] 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.

Professional Development

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 development. High quality professional development must be sustained, intensive, and classroom-focused (not one-day or short-term workshops or conferences) to have a positive and lasting impact on classroom instruction and teacher's performance. Research reports that elementary school teachers who received substantial professional development—an average of 49 hours—boosted their students' achievement by about 21 percentile points.[76]

Yet, most professional development today is ineffective. Though districts, including SHRSD, spend a considerable amount of time and resources on arranging workshops for teachers and other staff, research has shown that programs that are less than 14 hours have no impact on student achievement or

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[75] https://files.eric.ed.gov/fulltext/ED582978.pdf
[76] 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.

on teaching practices. Recent studies have concluded that effective professional development adheres to the following principles:

- The duration of professional development must be significant and ongoing to allow time for teachers to learn a new strategy and grapple with the implementation problem.
- There must be support for a teacher during the implementation stage that addresses the specific challenges of changing classroom practice.
- Teachers' initial exposure to a concept should not be passive, but rather should engage teachers through varied approaches so they can participate actively in making sense of a new practice.
- Modeling has been found to be a highly effective way to introduce a new concept and help teachers understand a new practice.
- The content presented to teachers shouldn't be generic, but instead grounded in the teacher's discipline (for middle school and high school teachers) or grade-level (for elementary school teachers).[77]

In SHRSD, Professional Development (PD) is led by the district's PD committee. The committee is responsible for reviewing survey data from students, staff, parents, and community members and aligning those findings with the district goals to develop the annual PD Plan (PDP). The district allots five (5) days of in-service training per year in addition to approximately 19 faculty and/or department meetings held after school throughout the school year. Over the past three school years, SHRSD has offered the following PDPs:

Exhibit 63. SHSRD 2020-2021 PDP

PL Goal	Goals	Identified Group	Rationale/ Sources of Evidence
1	Extend and expand strategies used to differentiate for all students' academic needs with a focus on the following groups: • English Language Learners • Enrichment/High Achieving students • Special Education students	General Education Teachers Special Education Teachers Enrichment Teachers ESL Teachers Administration Paraprofessionals	As indicated through surveying all stakeholders (staff members, parents, and students), it has been identified that a focus on continued professional development in these areas and beyond will assist in moving our district forward. In addition to the survey results, continued communications with parents and staff have caused the need for differentiation particularly for our enrichment students as an area of focus.
2	Build continued understanding, commitment, and ownership of the implementation of Social Emotional Learning (SEL) competencies to support mental and emotional well-being.	All staff Parents	As indicated through our district-wide survey along with feedback informally shared with teachers and administration, there is a continued need for additional professional development with regard to Social Emotional Learning competencies. In grade levels where mindfulness strategies have been fully implemented, students have reported that they benefit from the use of these strategies. Therefore, further implementation will benefit all students.
3	Implement strategies for a more seamless transition between	All Teachers	The surveys (referenced above) indicated that our students would benefit from additional post-

[77] Id.

		Support Staff Parents	graduation preparation and exposure to various post-secondary opportunities and support for milestone transitions within our PreK-12 configuration.

grades, from elementary to middle school, middle school to high school, and high school to college/career.

Exhibit 64. SHSRD 2021-2022 PDP

PL Goal	Goals	Identified Group	Rationale/ Sources of Evidence
1	Blended/Personalized Learning techniques will be utilized to meet the needs of diverse learners within all classrooms throughout the district.	Instructional Leaders (Administration) Cohort of Teaching Staff Members	Blended learning is a district initiative to increase student engagement in the learning process by helping teachers to personalize instructions for their diverse population of learners. Specifically, this initiative will help to provide teachers with tools to differentiate instruction by offering models and instructional strategies to them that enhance their use of data analysis, technology, and classroom design to reach mastery level teaching.
2	Extend and expand strategies used to differentiate for all students' cultural backgrounds with a focus on the following: • Resources (perspectives/diversity) • Culturally Responsive Planning • Culturally Responsive Instruction	Instructional Leaders (Administration) CRT Team Teaching Staff Members Paraprofessionals	Logical next step of training that was begun in the 2020-2021 school year while also listening to the results of surveys filled out by various stakeholders (staff members, parents, and students). Recognizing that student learning is dependent on their ability to see themselves in their scholastic environment and resources/materials, this goal is both necessary and valuable for classrooms and libraries throughout our PreK-12 district. Providing differentiated instruction that provides opportunities for all students to experience various perspectives fosters citizens who respect and empathize with various members of society. Further, culturally responsive pedagogy creates a powerful connection between classroom lessons and diverse student backgrounds. By building strategies to design and deliver culturally responsive lessons, teachers can better engage diverse learners and promote success for all students.
3	Professional Learning Communities (PLCs) - Develop an understanding of Professional Learning Communities and begin to establish structures that allow PLCs to be implemented.	Instructional Leaders (Administration) Teaching Staff Members	A description of Professional Learning Communities (PLCs) can be found here at the ASCD website. PLCs are a proven and effective way to build collaborative teacher leaders, allowing the most important needs to be addressed thoughtfully in specific areas. Through training staff members in how to establish and utilize effective PLCs, our district will further develop a culture designed to empower teams of professionals who can utilize their expertise and available data (collected

			through action research) to develop goals and work collaboratively to take action.
4	Continue to expand and refine Social Emotional strategies and programs through data driven practices to meet the specific needs of students, families, and staff.	Instructional Leaders (Administration) Teaching Staff Members Paraprofessionals	Continuing to follow the CASEL framework as well as NJ SEL competencies. Ensuring SE well being for students and staff is a proven necessary foundation for cultivating safe, healthy, and effective learning communities. https://casel.org/. Through our Multi-Tiered System of Supports (MTSS), our schools will implement data driven practices to identify specific areas of strength and needs in SEL and mental wellbeing for all learners. By providing teachers with PD in systems like Responsive Classroom, we will create the necessary support to build strong learning communities as our staff and students return to a more regular school experience following the COVID-19 pandemic. Working together with parents and our communities, we will provide opportunities for learning and developing social emotional acumen for students, staff, and families.

Exhibit 65. SHSRD 2022-2023 PDP

PL Goal	Goals	Identified Group	Rationale/ Sources of Evidence
1	Become familiar with the Priority Practices and utilize the self-assessment tool to identify specific and targeted practices for educator professional growth.	Instructional Staff Instructional Leaders (Administration)	As a result of the 2021-2022 cohort of teachers who experienced the Blended/Personalized Learning coaching, teachers have been both peer-critiqued and self-reflective regarding their instructional practices. These opportunities have proven to be effective in enhancing instruction and promoting this reflective practice throughout the district will only further enhance instruction as well as student progress and achievement.
2	Through the formation of the second cohort of teachers and the continuation of the first cohort's learning and support, Blended/Personalized Learning techniques will be utilized to meet the needs of diverse learners within classrooms throughout the district.	Instructional Leaders (Administration) Cohort #2 of Teaching Staff Members Staff Members involved in the 2021-2022 Cohort	Blended learning is a district initiative that began in the 2021-2022 school year. It has proved successful with one cohort of teachers in increasing student engagement in the learning process by helping teachers to personalize instructions for their diverse population of learners. Specifically, this initiative will help to provide teachers with tools to differentiate instruction by offering models and instructional strategies to them that enhance their use of data analysis, technology, and classroom design to reach mastery level teaching.
3	Extend and expand strategies that reflect all students' diverse profiles including: • Resources (perspectives/diversity)	Instructional Leaders (Administration)	The SHRSD has placed a focus on differentiating instruction for various learning needs and recognizes the need to continue to do so moving forward as our student population and needs are ever-changing. Having received professional

		School Counselors	development focused on diversity, equity, and
	• Culturally Responsive Planning and Instruction • Communication with students/families	School Counselors Culturally Responsive Teaching Team Teaching Staff Members Paraprofessionals	development focused on diversity, equity, and inclusion specific to ethnic/racial identity, students with special needs, enrichment students, and ELLs, we recognize a need to specifically focus on students within the LGBTQIA+ community as well as socio-economically disadvantaged students/families.
4	Continue to expand and refine Social Emotional Learning (SEL) through data driven practices to meet the specific needs of students, families, and staff.	Instructional Leaders (Administration) Teaching Staff Members School Counselors Paraprofessionals	Staff members, students, and families throughout the district have been familiarized with the SEL strategies and practices. As a result of increased stress and anxiety observed in all members of the school community, this is a necessary focus. Accessing a tool to measure students' SEL status will further assist in identifying students who may require additional support. Providing a quantitative measure of students' SEL, students will be identified, supported, and serviced in a way that meets their individualized needs.

Professional development offerings in SHRSD during the 2020-2021 and 2021-2022 school years covered a range of topics. A central focus was the need for differentiation to reach a more diverse audience of learners through the analysis of district-wide survey findings. The professional learning goals identified the ongoing need for differentiating instructional models and strategies: 1) "extend and expand strategies used to differentiate for all students' academic needs with a focus on the following groups: English Language Learners, Enrichment/High Achieving Students, and Special Education Students", 2) "blended/personalized learning techniques will be utilized to meet the needs of diverse learners within all classrooms throughout the district", and 3) extend and expand strategies used to differentiate for all students' cultural backgrounds with a focus on the following: Resources (perspectives/diversity), Culturally Responsive Planning, and Culturally Responsive Instruction." The district prioritized training staff across a variety of roles, including general educators, special educators, administration, and paraprofessionals, through the development of cohorts and professional learning communities. In addition to the aforementioned topics, SHRSD administration offered social emotional learning PD opportunities, including the Collaborative for Academic, Social, and Emotional Learning (CASEL) and the New Jersey Social Emotional Learning Competencies (NJ SEL), and strategies to facilitate a seamless transition between grades.

The primary focus of professional development for the 2022-23 school year has been a continuation of the Blended/Personalized learning techniques through cohort expansion. As a result of the 2021-2022 cohort of teachers who experienced the Blended/Personalized Learning coaching, teachers have been both peer-critiqued and self-reflective regarding their instructional practices. According to district administration, these opportunities have proven to be effective in enhancing instruction and promoting this reflective practice throughout the district will only further enhance instruction as well as student progress and achievement. Blended learning is a district initiative that began in the 2021-2022 school year. It has proved successful with one cohort of teachers in increasing student engagement in the learning process by helping teachers to personalize instructions for their diverse population of learners. Specifically, this initiative will help to provide teachers with tools to differentiate instruction by offering models and instructional strategies to them that enhance their use of data analysis, technology, and classroom design to reach mastery level teaching. The SHRSD has placed a focus on differentiating instruction for various learning needs and recognizes the need to continue to do so moving forward as our student population and needs are ever-changing.

In addition, according to district administration, over the past several years, SHRSD has prioritized both general and special educators participating in co-teaching professional learning opportunities within and outside of the district. Most, if not all PD offerings, are provided to general and special educators within the district. Data provided as part of this review affirms that the district has prioritized ensuring all teaching teams receive PD related to differentiation and supporting the varied instructional needs of students with disabilities. In addition, the district has anecdotally adopted the PD recommendations of the ELL audit.

Focus group participants shared several insights, consistent across groups, as to the overall nature of professional development in SHRSD. First, it was noted that there are gaps in content knowledge of special education processes for teaching staff. It was recommended that general education and paraprofessional team members within the district receive refresher training on special education concepts and processes. Specific topics suggested including Crisis Prevention Institute (CPI), executive functioning skills, behavioral support, understanding different diagnoses, and the manifestation of disabilities in the classroom. In addition, several participants across different focus groups advocated for more extensive and district-aligned training on how to draft IEPs, write PLAAFPs, and the establishment of a progress monitoring system.

Focus group and interview participants noted that the Office of Curriculum and Instruction frequently conducts professional development sessions, both as part of districtwide all-day sessions as well as in support of school-based trainings or meetings. It was also shared that the Office of Curriculum and Instruction staff are responsive to schools' or staff requests for training. In the past, at the beginning of each school year, the Office of Curriculum and Instruction administrative staff provided a series of training courses on the six (6) co-teaching models. While the district has committed to ongoing PD related to co-teaching, systemic barriers such as time to co-plan and time for relationship building to strengthen teaching teams exist.

Staffing Allocations and Analysis

PCG conducted a descriptive analysis of SHRSD role descriptions, staffing needs, and professional development provided to staff. The qualitative analysis methods were implemented to determine, if any, gaps exist between current staff needs and expectations within district expectations. The staffing analysis includes a more detailed breakdown of staff- to- student ratios by role and by caseload.

Special Education Teachers and Paraprofessionals
Information about SHRSD's special education teachers and paraprofessionals ratios is included below (2022-23 SY).

Level	School	Total Population	# of Students with IEPs	% of Students with IEPs	Special Educator FTE	Special Educator to Student Ratio	Paraprofessional FTE
Elementary School	Lambertville	218	49	22.4%	7.0	1: 7	13.0
Elementary School	West Amwell	167	34	20.4 %	5.0	1: 7	4.0
Middle/High School	South Hunterdon Regional School District	415	93	22.4 %	12.0	1: 8	5.0

- **Special Educators.** SHRSD has an overall average of 16 students with IEPs for each special educator. It is important to note that there is minimal variability across the elementary schools when comparing average of students with IEPs for each special educator (LPS- 5.4 vs. WAS-5.6). At the secondary level, there was a higher average of 7.75 students with IEPs per special educator.

- **Professional Assistants.** SHRSD has an overall average of 8.8 students with IEPs for each professional assistant. It is important to note that there is considerable variability across the elementary schools when comparing average of students with IEPs for each special educator (LPS- 4.08 vs. WAS-11.33). At the secondary level, there was a higher average of 18.6 students with IEPs per special educator.

Student Services and Related Service Providers

Information about SHRSD's student services and related service providers is included below (SY 2022-23).

Level	School	Child Study Team	Speech Therapist	Occupational Therapist	Physical Therapist
Elementary School	Lambertville	1	1	Services all schools	Services all schools
Elementary School	West Amwell	1	1		
Middle/High School	South Hunterdon Regional School District	1	1		

- **Child Study Team**. There is one CST that serves the entire district. As previously mentioned, the CST is compromised of one Learning Disabilities Teacher Consultant, one School Psychologist, and one School Social Worker.
- **Speech/Language Pathologists**. There is one Speech Language Pathologist that serves the each of the three SHRSD schools.
- **Occupational Therapist (OT)**. There is one Occupational Therapist that serves all of the SHRSD schools.
- **Physical Therapist (OT)**. There is one Physical Therapist that serves all of the SHRSD schools.

Caseload Size

Information about SHRSD's caseload by related service provider is included below (SY 2022-23).

Level	School	Child Study Team	Speech Therapist	Occupational Therapist	Physical Therapist
Elementary School	Lambertville	63	41	12	4

Elementary School	West Amwell	49	23		
Middle/High School	South Hunterdon Regional School District	64	35 (serves Preschool, too)		

- **Child Study Team**. Caseload variances exist within and across CST members by school. It is important to note that CST assigned to Lambertville and SHRSD schools have on average 14-15 more students on their respective caseload when compared to West Amwell.

- **Speech/Language Pathologists**. Caseload variances exist within and across Speech Language Pathologists (SLPs) by school. It is important to note that SLP assigned to Lambertville has, on average, 18 students on their respective caseload when compared to West Amwell.
- **Occupational Therapists (OT)**. No comparative data is provided as this is a single provider.

- **Physical Therapists (PT)**. No comparative data is provided as this is a single provider.

Significant variances exist when comparing the caseloads of CST members and SLPs by school. Overall, staff assigned only to West Amwell have fewer students for both case management and service provision. That has a direct impact on the quality and timeliness according to focus group participants. It was also noted that while an awareness exists some providers have almost double the caseload, no secondary balancing efforts were made to make this more equitable. It is essential that the district adopts practices to closely monitor caseloads, by role and by school, and implement a fluid staffing allocation model to ensure equitable job responsibilities.

As part of this review, the district did not provide written guidance detailing the model(s) used currently to allocate school-based staff members. Anecdotal feedback was provided by focus group and interview participants speaking to the fluidity applied when addressing allocations based on building, programs, enrollment, and student numbers/need.

School-Based Feedback on the Allocation Process
In addition to the quantitative analysis, school-based staff shared concerns about the allocation process and staffing ratios overall. Some staff felt their schools had enough special education personnel, while others believed that despite increasing caseloads there are no corresponding increases in staff to support student need or strategies to more equitability balance caseloads.

The following insights from school staff were shared during focus groups about special education teachers, paraprofessionals, and Related Service Provider (RSP) staffing allocations, caseload and schedules, and roles and responsibilities:

Staffing Allocations

- Staffing models are consistent across schools; however, caseloads are disproportionate.
- Staffing inequities exist across buildings.
- There is insufficient staffing on the CST to support workload and role responsibilities
- The district needs equitable staffing allocations across elementary schools to maximize service provision and comparable workloads.
- The district should deploy a flexible staffing model to meet student needs and balance workloads.

- There should be ongoing processes to determine how SHRSD staff are best utilized and allocated.

Caseloads and Schedules

- Some SHRSD student-facing staff feel overwhelmed by their caseloads.
- SHSRD staff are going above and beyond to meet student needs despite increases in caseloads and scheduling challenges.
- Some staff may be overutilized and some staff may be underutilized in their current capacity
- Scheduling needs dictate staffing allocations and impact caseloads.

Staffing Hiring and Retention

SHRSD generally does not have recruitment or retention challenges. One paraprofessional vacancy was unfilled during the Fall 2022 data collection period. According to focus group participants, open positions come up rarely and are filled quickly with suitable candidates, despite having to compete with other districts in the area. School leaders noted that though their current teaching positions are filled, not much more can be done in their schools in terms of service delivery without hiring more staff. Focus group and interview participants consistently highlighted concerns regarding the time necessary to solidify strong co-teaching pairs is not feasible within the existing staffing structure, particularly at the high school level.

Many focus group participants shared that the staff in SHRSD are, on the whole, talented, knowledgeable, and know their craft. The perception exists that retention can be attributed to "the family-like nature of the district." The closeknit community has fostered long-standing relationships between parents, students, and SHRSD staff. Throughout the focus group and interview process, SHRSD frequently acknowledged how the "family" orientation of the district at-large and "awesome students" promote both tenure and quickly filled vacancies.

Summary and Implications

SHRSD has a strong professional development structure in place to address the need for increased academic rigor for students with disabilities. Paraprofessionals participating in professional development opportunities is a unique approach to best maximize the efforts of these team members within the context of their roles. District staff would benefit from formalized professional development expectations, and time to effectively collaborate, to promote its ICR SDI model, co-taught instruction.

While SHRSD leadership has invested in comparable staffing structures for teaching teams, CST, and related service providers across buildings, the caseload inequities must be addressed. Double the caseload number can be functionally equivalent to more assessments, higher volumes of service provision, less opportunity to collaborate with parents, etc. It is essential that the district continues to utilize digital mechanisms for live-tracking of caseloads to balance work equitably and to ensure a more flexible staff deployment model.

IX. SYSTEMS AND STRUCTURES

Strengths	Opportunities
• Streamlined organizational structure • Substantial financial investments in instruction for students with disabilities	• Financial commitments to funding instruction for students with disabilities has not yielded meaningful academic outcomes • Disproportionate responsibility and decision-making within certain roles in the organizational structure.

Organizational Structure

Exhibit 66: SHRSD Special Education Organizational Chart
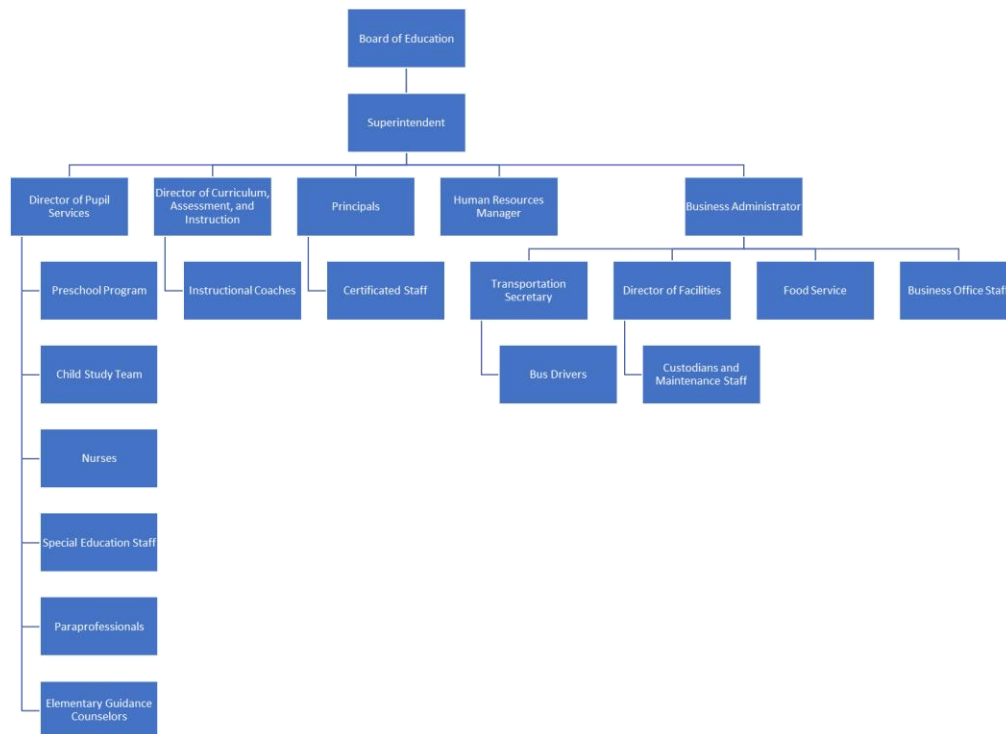
Administrative Structure Supporting the Delivery of Special Education Services

The SHRSD Department of Special Services consists of the following:

- 1 Director of Pupil Services
    - Nursing Staff
    - Child Study Team Staff
    - The Preschool Program
    - Special Education Staff, including Paraprofessionals

- Elementary Guidance Counselors

As required by the New Jersey state regulations, Child Study Teams (CSTs) have broad responsibility, consisting of the identification, evaluation, determination of eligibility, development and review of the individualized education program, and placement. CST Teams play an important role in compliance and the creation of high-quality special education documents. CSTs consist of three educational professionals: school psychologist, school social worker, and a learning disabilities teacher consultant (LDTC). Contingent upon the areas of concern for each individual student, the CST team may include other specialists such a Speech and Language Pathologist, Counselor, Behavior Specialist, Occupational Therapist, or Physical Therapist. In SHRSD, there is one Child Study Team that works across all campuses.

All special education staff, including paraprofessionals and CST team members, are supervised by the Director of Pupil Services. Building leaders hold what can be perceived as equitable oversight for daily practices of Special Services students facing staff. That is not reflected in the organizational structure provided by the district.

Through information gathered from file review focus groups and the independent file review, there appears to be inconsistent practices around CST/IEP Team standard operating procedures. Focus group and interview participants acknowledge that each building has its own culture and IEP processes, and it was speculated this is a holdover from before the district regionalized.

The administrative structure supporting the delivery of special education services is relatively straightforward; however, through information gathered from focus groups, the connection between IEP development and implementation practices is less clear. In focus groups, IEP team members shared concerns that, at times, CST members have strong philosophical views on programming, and this may have occurred through previous changes in special education director leadership. Thus, a CST's philosophical vision can significantly influence how decisions are made. This power dynamic serves as a key finding of this study and is not reflected within the existing organizational structure of SHRSD.

Costs and Comparison to Peer Districts and State

New Jersey User Friendly Budget

In reviewing how a district leverages its financial resources on special education and comparing the reviewed district to New Jersey peers, PCG refers to the *New Jersey User Friendly Budgets*. According to the New Jersey Department of Education: "In order to provide increased public accountability and transparency, N.J.S.A. 18A:22-8 requires officials in each school district to place a user-friendly summary of their proposed budget on the district's website (if one exists). N.J.A.C. 6A:23A-8.1(c) requires the user-friendly budget summary to be posted on the district's website within 48 hours after the public hearing on the budget. After the election (and following municipal review if the budget is defeated), a final user-friendly summary of the final budget must be posted on both the district's website (pursuant to N.J.S.A. 18A:22-8a) and the Department of Education's website."[78]

Within this review, PCG uses *New Jersey User Friendly Budgets* for comparison purposes; should concerns emerge when reviewing these data, the district should pose additional questions to its Business Administrator and or a Certified Professional Accountant.

The New Jersey User Friendly Budgets provide a count of "students on roll" among other groups of students, including out of district placement students. For purposes of this analysis, because the Special Ed Instruction; Child Study Team expenditures; and OT, PT, Related Services are all for students within the schools, PCG used the "students on roll" count. In addition, for this analysis, PCG used actual 10/15/2020 Student Counts and 6/30/2021 audited numbers, all of which are included in the New Jersey

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[78] https://www.nj.gov/education/finance/fp/ufb/

User Friendly Budgets. These data are the most recent, publicly available school district expenditure data.

SHRSD' *Special* Education Expenditures

PCG worked with SHRSD to identify seven peer districts on the following like characteristics: (1) student population; (2) socioeconomic status; (3) population; (4) salaries. The selected districts are:

- Belvidere
- Kenilworth
- Warren Hills Regional
- Dunellen
- Bound Brook
- Springfield
- Manville

In SHRSD, the special education budget is managed by the Business Administrator. The Special Education Director works with Business Administrator to discuss annual budgeting and expenditures within the department; however, the Special Education Director is not responsible for publicly reporting the budget to the Board of Education or State of New Jersey for the *User Friendly Budgets*. According to district administration, the numbers SHRSD has been submitting to New Jersey for its *User Friendly Budgets* are incorrect. SHRSD provided corrected numbers which are included in this report.

For purposes of the analyses in Exhibits 68-72, PCG conducted its analysis using the *New Jersey User Friendly Budgets*. PCG is looking at this on a cost per special education student basis, specifically using student with disability (SWD) numbers from the *New Jersey User Friendly Budgets*.

Exhibit 67. 2020-21 Peer Districts Expenditures on Special Education, Child Study Teams, and Related Services, New Jersey User Friendly Budgets and Reported Data by SHRSD

	On Roll Total Students (full time, shared time, and received)	SWDs on Roll (full time and shared time)	OT, PT, Related Services Expenditure	Child Study Teams Expenditure	Special Ed Instruction Expenditure
Springfield	2181	298	$325,148	$665,594	$3,639,883
Bound Brook	1851	305	$276,903	$1,053,510	$2,408,302
Warren Hills Reg	1723	254	$362,396	$668,022	$2,825,203
Manville	1521	256	$238,915	$725,912	$2,465,274
Kenilworth	1442	165	$534,623	$770,928	$2,552,052
Dunellen	1231	148	$223,650	$673,405	$1,429,257
South Hunterdon Regional	875	131	$251,688	$524,678	$2,161,288
Belvidere	628	99	$285,943	$18,196	$908,887

When reviewing special education instruction costs per student with disability on roll using data reported in the *New Jersey User Friendly Budgets*, SHRSD is highest out of eight districts reviewed in its special education instruction costs.

Exhibit 68. 2020-21, Peer Districts, Special Education Instruction Cost Per Students (SWD on Roll)
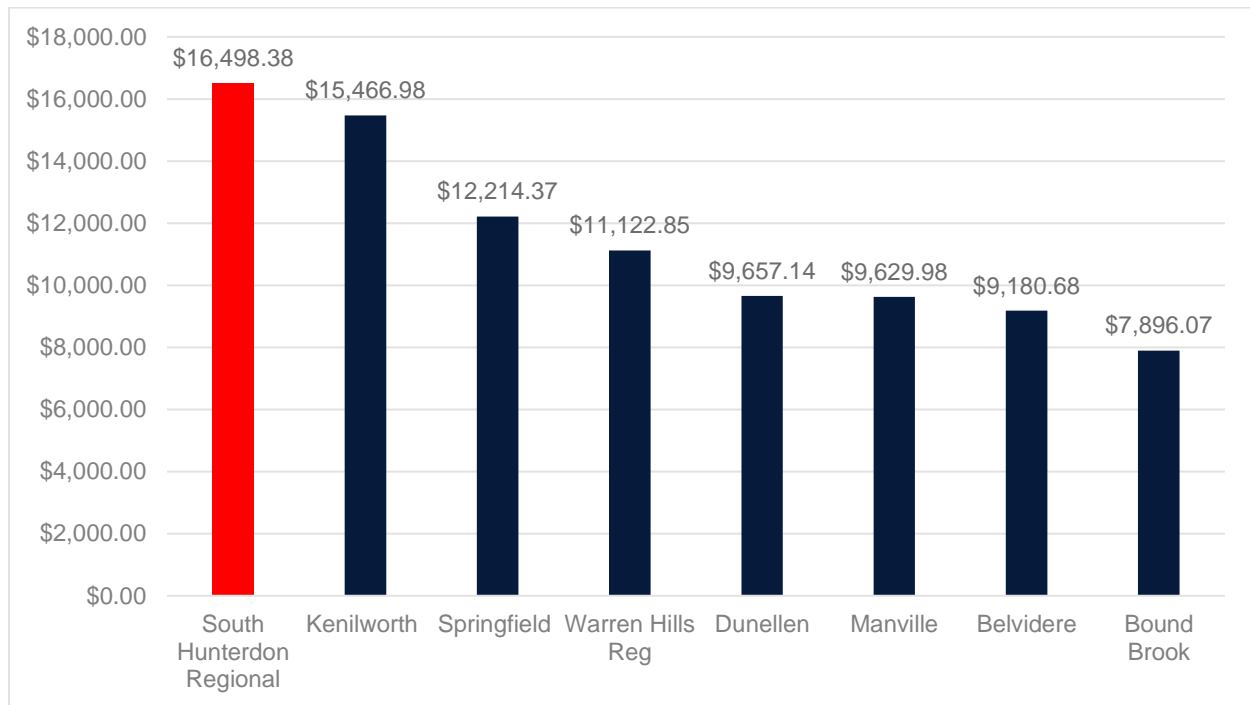
When reviewing OT, PT, and related service costs per student with disability on roll using data reported in the *New Jersey User Friendly Budgets*, SHRSD's expenditures are the third highest out of eight districts reviewed.

Exhibit 69. 2020-21, Peer Districts, OT, PT, and Related Service Cost Per Student (SWD on Roll)
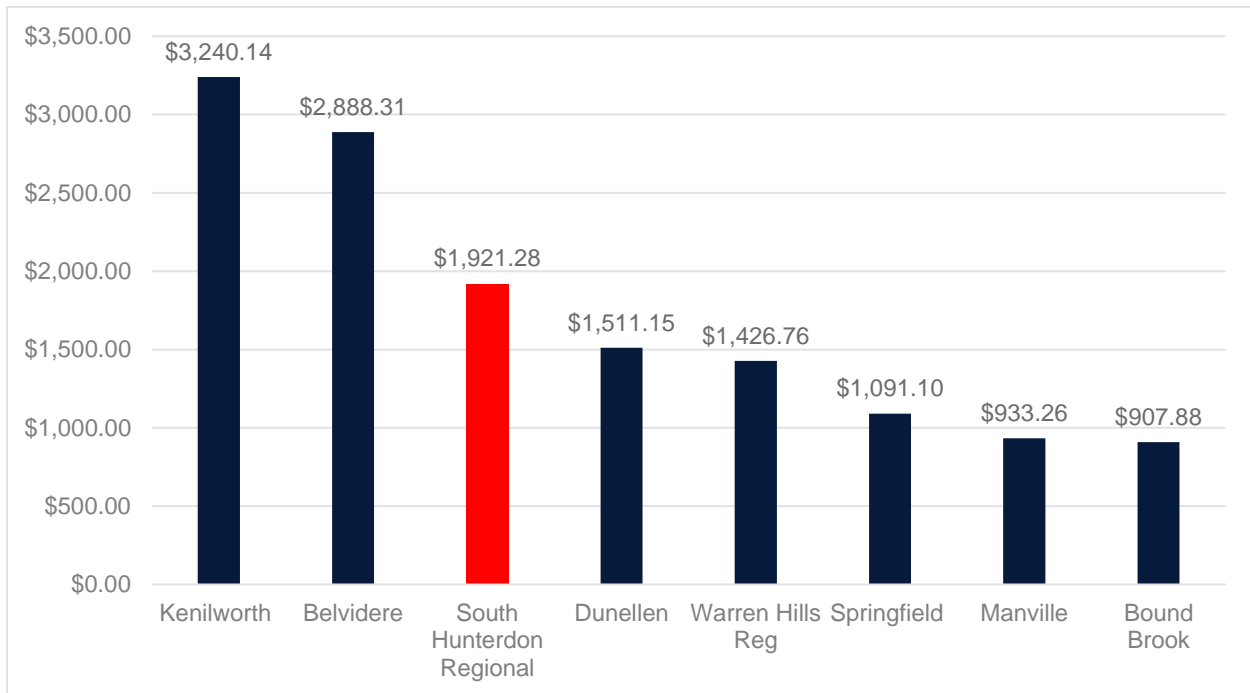
When reviewing child study team cost per student with a disability on a roll using data from the *New Jersey User Friendly Budgets*, SHRSD's expenditure is third highest out of eight districts reviewed.

Exhibit 70. 2021-22, Peer Districts, Child Study Team Cost Per Student (SWD on Roll)
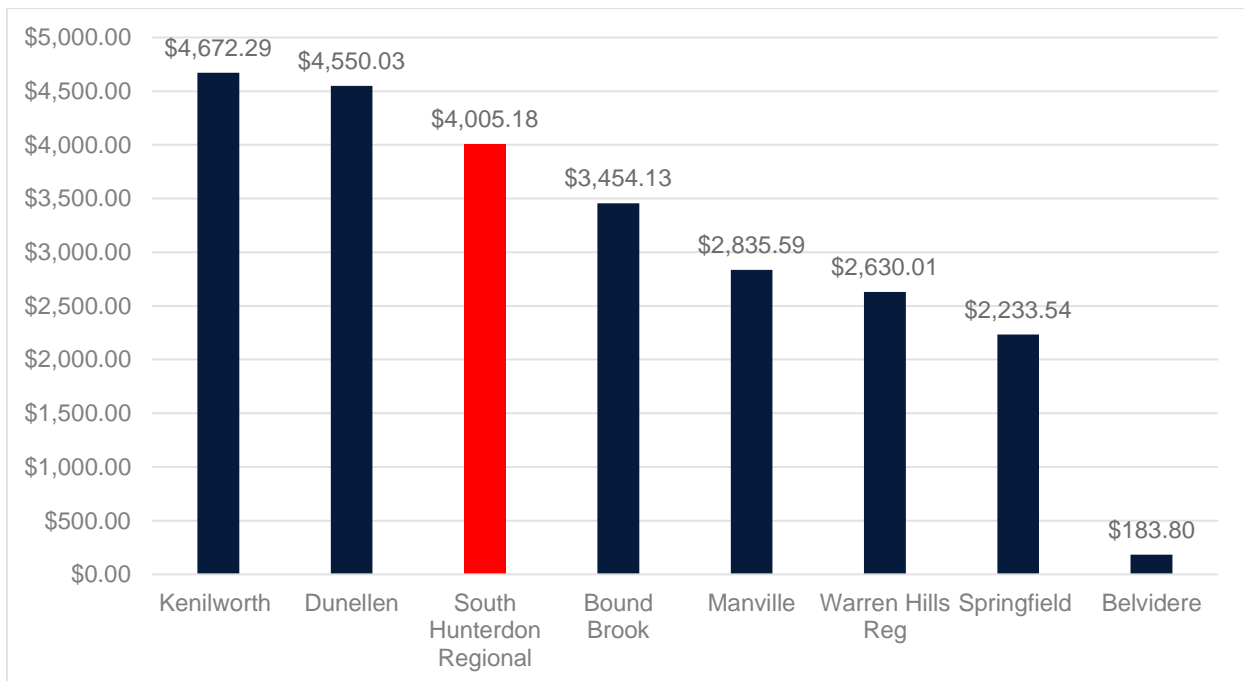
Key Special Education Costs

As evidenced from the key expenditure data from the *New Jersey User Friendly Budgets*, key special education expenditures have been relatively stable. Additional analysis was conducted for the SHRSD budget, by campus and by expenditure category over the past 3 school years (SY 2019-20, SY 2020-21, and SY 2022-23). Funding has remained relatively stable and consistent across all campuses and categories.

Exhibit 71. Key Expenditures

	Special Education Enrollment	Special Education Instruction	Related Services	Extraordinary Services	Child Study Team
2020-21	131	$2,161,288	$251,688	$10,393	$534,678
2019-20	142	$2,147,893	$249,595	$9,792	$512,143
2018-19	143	$2,263,954	$232,809	$10,455	$503,589

Summary and Implications

SHRSD is overall well-resourced financially and makes significant contributions to instruction and related services staffing. When reviewing special education instruction costs per student with disability on roll using data reported in the *New Jersey User Friendly Budgets*, SHRSD is highest out of eight districts reviewed in its special education instruction costs. For SHRSD to meet RDA/SPP targets, effective, high-yield collaborative practices will be needed. To implement these practices district-wide, an effective teacher allocation and student-centered scheduling model will need to be in place. SHRSD's allocations formula does currently account for the expansion of co-teaching practices. The district is partnering with an outside agency to support master scheduling across the three campuses. This initiative has the potential to make significant positive impacts on SHRSD time and better utilization of instructional resources to promote positive outcomes for students with disabilities.

X. RECOMMENDATIONS

PCG saw ample evidence that SHRSD has a solid foundation on which to build. SHSRSD has many notable strengths, including its passionate and knowledgeable staff and its willingness to undertake this review and act on the recommendations as part of a continuous improvement cycle.

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

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

1. Multi-Tiered System of Supports

- **MTSS framework.** Build on SHRSD's current I&RS processes to develop a unified and clear structure of MTSS for academic achievement, positive behavior, and social/emotional growth (including enrichment) for all students. Create guides to explain how the intervention models, complement each other.
- **Electronic dashboard**. Develop a transparent and widely accessible district-wide early warning dashboard to monitor student intervention data use and growth for academics and behavior to enable leadership at the central office and schools to review MTSS implementation and student growth, identify patterns, solve problems, and make data-informed decisions. Review and expand upon rubrics currently in use to have a universal set of documents that are relevant based on grade levels and types of schools.
- **Written guidance.** Create an electronic user-friendly, and accessible MTSS manual for school teams and for parents to understand the MTSS process and to document procedures/practices relevant to the management/operation of MTSS in SHRSD. Include protocol for collecting progress monitoring data and assessing student growth; what constitutes adequate progress and associated lengths of time to allow for progress, and requirements for initiating a special education evaluation when such progress is not shown. Ensure a common understanding and buy-in around the district for the need for MTSS, why and how it is implemented, what desired targets it is intended to meet, and what progress the division is making toward achieving the goals. Maintain the manual by updating it regularly as there are changes to policy or practice.

2. Redesign and Rebrand of Supplemental Study

- **Establish consistent expectations for the Supplemental Study model.** Redesign and rebrand Supplemental Study by providing written protocols for a genuine collaborative-consultative teaching model in which students with disabilities are provided intensive supplementary instruction in areas not covered by grade level core curriculum. For example, executive functioning skill development and academic study skills, etc. Ensure these classes have guidance to standardize implementation (i.e., grading protocols, instructional practices, data collection procedures, etc.) to ensure students increase the trajectory of their learning in their area(s) of need. View this setting as a rigorous opportunity for students with disabilities to hone specific areas of need and not a courseload filler.
- **Adhere to an authentic collaborative-consultative instructional model for Supplemental Study.** If the district chooses to continue offering Supplemental Study, it is recommended it follow

an authentic collaborative-consultative teaching model as described earlier in this document. The courses should be led by special education teachers who are engaging in frequent consultation with general education teachers and are engaging students on targeted areas of instruction specific to students' IEPs. Furthermore, data collection and progress monitoring should occur throughout the duration of the course.

- **Growth mindset**. Ensure students with disabilities are challenged academically as their non-disabled peers. Explore a student-centered decision-making model for students with disabilities to take an active role in creating their courseloads, particularly ensuring equitable access to electives and Honors/AP courses. Set ambitious goals to address access barriers for students with disabilities participating in advanced level courses.
- **Professional development.** Provide professional development for Supplemental Study teachers and general education teachers on the implementation of collaborative-consultative instruction. Additional professional development opportunities should focus on teachers becoming aware of unconscious biases and how that may impact students with disabilities accessing higher level courses.

3. Equity and Access to Advanced Placement for Students with Disabilities

- **Address barriers to equity and access.** Develop a coherent plan across grade levels and schools to enable a higher proportion of potentially qualified students with disabilities to benefit from advanced academic studies/courses. As part of this process, consider teacher and parent input to analyze current barriers to access for students with disabilities and develop a plan to mitigate these challenges.
- **Written guidance and training.** Provide written guidance and other information to CST teams, school-based staff, and parents about how students with disabilities can access advanced placement courses, with appropriate supports and accommodations.
- **Track increased enrollment.** Establish a goal and target to increase current enrollment of students with disabilities in advanced placement and other enrichment/advanced learning courses and monitor enrollment data on a quarterly basis.

4. Out of District Placements

- **Parent outreach**. Talk with parents and CST teams who sought or obtained an out of district placement to better understand their motivations and SHRSD program gaps.
- **School assessment**. Visit or obtain other information about the most common out of district placements to ascertain how these resources are different from any currently available for any student in SHRSD schools.
- **Cost analysis.** Consider the cost of out of district placements, including costs associated with transportation and complaint/due process resolutions, and how this money can be used instead to provide these and other resources within SHRSD schools. Use this information to develop the instructional models described in the above recommendations.

5. IEP Development

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

- **IEP goals.** Ensure IEP goals are based on student needs identified within the PLAAFP ensuring that goals are not being created or influenced by district limitations within SHRSD's current continuum of services.
- **Monitoring IEPs.** Establish and implement a process for periodically reviewing student IEPs for their consistency with expected standards. Consider using a school-based process, which would include an impartial SHRSD facilitator to review, analyze and discuss IEPs with teachers and related service providers.
- **Electronic data repository.** Study electronic data repositories to improve data collection ease and subsequent reporting of student data for quarterly IEP progress reporting to choose one that would meet SHRSD needs.
- **Collaboration.** Foster positive collaboration by creating more planning time between general education and special education teachers; ensuring adequate time and coverage for staff participating in CST meetings; and transparent processes around timelines, data, and information sharing with parents to enhance trust and partnership among all CST members. Provide interpreters for parents who are non-native English speakers and translate IEP documents.

6. Expanding the Least Restrictive Environment Continuum

- **General education classroom composition.** Establish a maximum student classroom ratio for students with and without disabilities for general education and monitor the ratio to ensure these configurations are not "inclusion in name only" and do not comprise a majority of students with IEPs and 504 Plan taught solely by general education teachers.

- **Collaborative consultation.** Draft guidance for collaborative and consultative teaching to support students with disabilities. Under this model, general educators along with one or more other educators (e.g., special educator, reading specialist, EL teacher, gifted/talented teacher) collaborate around the designing, delivering, monitoring, and evaluating of instruction in general education classes, with the general educator providing instruction.

- **Co-taught instruction.** Draft guidance for the delivery of co-taught instruction based on the most effective model for instruction purposes and use of the special educator. Based on the developed guidance, provide intensive professional development and follow-up coaching and modeling to give co-teachers the information and support they need to be true partners in the planning and delivery of classroom instruction. Monitor implementation through classroom walk through activities that are guided by observation protocol for this purpose.

- **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.

7. Supporting Dually Identified Students (EL and Special Education)

- **Track trends 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, suspension rates, etc., to identify any student group that it is two times more likely than peers to be identified as being over-identified (i.e., risk ratios).
- **Track school identification rates.** Analyze longitudinal data to determine which schools may be identifying students with IEPs at a rate that is disproportionately higher or lower than other schools.
- **Data review and hypotheses.** With a cross-departmental group of leaders and staff, use this data to develop hypotheses for identified disproportionate risk ratios for any group of students,

delays in the evaluation referrals and completions, and/or schools with disproportionately high new identification rates.

- **Follow-up action.** Based on these hypotheses, develop any additional written guidance needed to clarify procedures and practices, consider any additional resources and strategies needed along with a written plan, if appropriate, and provide training to support implementation. For example, identification disproportionality training would include the implications of race/ethnicity/language, socio-economic status, and culture constructs for school-based teams when considering students for an evaluation.
- **Monitoring.** Based on the areas of practice identified through the above activities, identify data to be collected and monitored, along with any practices to be monitored, to support consistent implementation across SHRSD and to identify schools needing additional support or intervention.
- **Guidance, training, and support.** Provide schools with the guidance, training, and support necessary to better understand how to implement viable programming and strategies for dually identified students.

8. Establish Districtwide Vision for Special Education

- **Collaborative vision.** With representatives of district leadership, SHRSD staff as well as SHRSD parents of students with disabilities, create a collaborative, districtwide vision for special education. Based on these discussions, create a core belief vision statement of agreed-upon ideals. Share it with other stakeholders to build momentum for the cohesive approach for special education provision.

9. Special Education Policy and Procedure Manual

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

10. Elevate Rigor

- **Professional development.** Ensure that all professional development designed and delivered elevates instructional rigor that is inclusive of students with disabilities. Focus information on best practices for motivating learners and setting high expectations, addressing UDL and differentiated instruction, progress monitoring, and mastery of learning.
- **Resources.** Include how this information will be supported with necessary material and human resources.

11. Parent Trainings

- **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.

12. Parent Special Education Advisory Group

- **Increase Participation in the Parent Special Education Advisory Group**. Increase participation of parents of students receiving special education services within SHRSD, campus-

based staff, and members of the community to create a shared vision for family engagement surrounding special education. Focus on building a diverse and multilingual parent engagement team. Create a core belief vision statement of agreed-upon ideals. Share it with other stakeholders to build family engagement support across the district and in partnership with other SHRSD parent engagement initiatives. Provide a clear "who to contact" list for DSS and a liaison through which to filter and coordinate parent concerns at the central office.

From Strategy to Execution

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

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

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

Exhibit 72. PCG's Strategy Execution Process
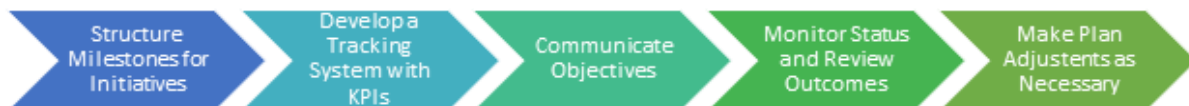
Structure Milestones for Initiatives

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 SHRSD 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 2022-23 and 2023-24 school years.

Develop a Tracking System with KPIs

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

Communicate the Objectives

To implement new policies and procedures, organizational changes, or new approaches, stakeholders need a solid grasp of the initiatives, the objectives, and the benefits the plan will bring to bear.

Communicating progress made on each key initiative is equally important to ensuring continued support from those impacted by the changes, as well as the associated stakeholders.

Monitor Progress and Review Outcomes

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

Make Plan Adjustments as Necessary

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

APPENDIX

Staffing Ratios

Special Educators, Paraeducators, Speech/Language Pathologists, and Psychologists

Ratios for Special Educator, Paraeducator, Speech/Lang, and Psychologist	State	Special Educator		Paraeducator		Speech/Lang		Psychologist	
		Number	Ratio To: Sped	Number	Ratio To: Sped	Number	Ratio To: Sped	Number	Ratio To: Sped
Agawam Public Schools	MA	39	16.8	100	6.6	15	43.7	3	218.7
Alexandria City Public Schools	VA	189	10.0	151	12.6	28	67.7	20	96.2
Albuquerque PS	NM	1217	13.8	1290	13.0	161.5	103.6	98	171.5
Atlanta Public Schools	GA	431	11.5	224	22.1	65	76.2	22	225.0
Anchorage School Dist	AK	794.32	8.2	706.66	9.2	65	100.3	44.7	145.9
Arlington Pub Sch	VA	415.7	9.2	270	14.1	36.6	104.1	37.9	100.6
Arlington ISD	TX	422	11.4	455	10.5	72	66.7	21	228.5
Austin Pub S D	TX	772.5	10.4	824	9.8	70.5	114.4	34.6	233.0
Baltimore City Publ Sch	MD	1,121	11.5	620	20.8	92	139.8	NA	NA
Baltimore County P Sch	MD	1245.8	13.5	665.5	25.2	154.7	108.3	85.3	196.5
Boston Public Schools	MA	1242.3	9.1	800	14.2	147	77.2	76.8	147.8
Bellevue SD	WA	82.7	23.5	118.6	16.4	17.4	111.9	17.3	112.5
Bridgeport	CT	204	16.9	254	13.6	25	138.0	33	104.5
Buffalo Public Schools	NY	696	11.1	365	21.2	105	73.8	62	124.9
Cambridge Publ Schools	MA	240.03	5.0	142.5	8.4	20	60.0	22	54.5
Carpentersville	IL	220	14.3	380	8.3	43	73.0	28	112.1
Chicago Public Schools	IL	4,329	11.5	4,949	10.1	390	127.5	258	192.8
Cincinnati Pub Schools	OH	457	19.5	801	11.1	62	144.0	57.7	154.7
Clark Cty School Dist	NV	2,221	18.4	1,346	30.3	299	136.4	180	226.5
Cleve Hts-UnivHtsCty	OH	83	10.8	58	15.5	7	128.6	8	112.5
Cleveland PS	OH	855	9.8	486	17.2	81	103.1	82	101.8
Columbus City	OH	650	15.0	990	9.8	64	152.0	78	124.7
Compton Unified SD	CA	126	23.7	118	25.3	5	596.2	14	212.9
Dallas PS	TX	1078	12.5	868.5	15.5	81	166.3	37	364.1
DeKalb 428	IL	58	15.2	205	4.3	9	97.7	7.5	117.2
DesMoines Public Schls	IA	479	9.8	600.1	7.8	118.4	39.5	11.5	407.0
D.C. Public Schools	D.C	669	11.4	653	11.7	90	85.1	78	98.1
Davenport Comm Sch	IA	221	8.4	344	5.4	NA	NA	NA	NA
Deer Valley Unified SD	AZ	299	11.0	312	10.5	50	65.8	34	96.7
Denver Public Schools	CO	592	15.4	528	17.3	94	97.3	98	93.3

Detroit	MI	535.8	16.3	458	19.1	98	89.1	40	218.3
ESD 112	WA	55	36.1	158	12.6	20	99.4	12	165.6
Elgin U-46	IL	252.8	21.0	544	9.8	71.9	73.8	20	265.2
Everett Pub Schools	WA	356	8.0	51	55.7	4	710.0	5	568.0
Fort Worth	TX	520	12.8	450	14.8	73	91.1	31	214.5
Fresno PS	CA	509.6	16.2	603.1	13.7	75.5	109.5	65.7	125.9
Garland ISD	TX	371	14.5	338	16.0	57	94.6	9	599.2
Greenville County	SC	463	21.4	376	26.3	93	106.4	25	395.8
Guilford County	SC	575	17.5	448	22.5	127.7	78.8	52.33	192.3
Houston Indepen SD	TX	1,625	10.4	1,145	14.8	158	107.1	21.01	805.5
Jacksonville County	FL	193	14.2	89	30.8	25	109.6	110	24.9
Kalamazoo Pub Schools	MI	70	23.8	79	21.1	15	111.1	NA	NA
Kent Pub Schools	WA	148.7	20.3	318	9.5	32.3	93.4	34.5	87.4
Lake Washington	WA	161	18.8	241.5	12.5	32.6	92.7	26.2	115.3
Kyrene School District	AZ	141	12.0	124	13.6	27	62.4	14	120.4
Lakota Local	OH	126	18.3	120	19.2	39	59.0	18	127.8
LAUSD	CA	5,331	12.0	6,466	9.9	496	128.6	514	124.3
Lincoln	NE	21	9.5	60.7	3.3	5	40.0	2	100.0
Madison Pub Schls	WI	415.6	9.2	448	8.5	76.2	50.0	42.5	89.6
Marlborough Pub Sch	NJ	141	3.8	115	4.7	7	76.6	4	134.0
Shelby County (Was Memphis City)	TN	942	17.7	655	25.4	53	313.9	58	286.8
Miami-Dade	FL	2,500	16.0	1,226	32.6	209	191.4	206	194.2
Milwaukee	WI	1281	12.8	988	16.6	169	97.1	136	120.6
Montgomery County Schools	MD	2,086	11.0	1,751	13.1	293	78.0	136.3	167.7
Naperville 203	IL	150	13.8	237	8.7	33	62.5	22	93.8
Nashville City	TN	680.5	14.9	594	17.1	109	93.0	65.5	154.8
New Bedford	MA	204	13.0	205	13.0	26	102.1	9	295.0
Northern Valley RHSD	NJ	28	17.9	30	16.7	1	502.0	3	167.3
Oak Park Sch Dist 97	IL	78	10.1	90	8.7	14	56.1	8	98.3
N. Chicago (in Dist.)	IL	39	10.2	27	14.8	8	49.9	5	79.8
Norfolk	VA	381	11.4	304	14.2	35	123.7	23	188.2
Oakland Unified SD	CA	392	13.7	175	30.7	47	114.2	43.5	123.4
Omaha City	NE	485	18.9	470.5	19.4	85	107.6	33	277.2
Orange County	FL	NA	NA	1165	20.9	202	120.7	99.5	245.1
Pinellas County	FL	881	16.7	774	19.0	150	98.0	79	186.1
Pittsburgh Pub Schools	PA	359	14.2	554	9.2	40	127.4	138	36.9
Portland Public Schools	OR	355	20.4	535	13.5	92	78.6	56	129.1
Prince William County Schools	VA	774	14.6	362	31.2	67	168.7	57.6	196.3
Providence	RI	340	13.1	479.1	9.3	40	111.5	28	159.3

Renton	WA	170.1	12.4	294	7.2	20	105.4	18.4	114.6
Rochester City	NY	559.2	9.8	428	12.8	148	37.0	64	85.5
Rockford Pub S	IL	336	11.8	334	11.8	49	80.6	24	164.5
Round Rock	TX	369	11.9	171	25.8	41	107.5	29	152.0
Sacramento City	CA	288.1	22.6	246.2	26.5	33	197.5	50.8	128.3
San Diego Unified SD	CA	1,100	13.4	1,300	11.4	196	75.4	129	114.6
Saugus	MA	32.44	14.2	74	6.2	6	77.0	2	231.0
Sch Dist of Philadelphia	PA	1,564	21.5	2585	13.0	99	340.3	149	226.1
Scottsdale	AZ	349.77	8.3	230	12.6	39.4	73.4	28.4	101.8
Seattle	WA	548.8	13.3	823.3	8.8	82.2	88.6	60.2	120.9
South Hunterton Regional SD	NJ	31.3	5.1	25	6.4	3	53.3	1	106.7
St. Paul	MN	481.2	12.0	536	10.7	97	59.4	19	303.2
Stockton	CA	258	17.2	344	12.9	47	94.4	36	123.2
Sun Prairie Area S Dist	WI	62	11.2	93	7.5	14	49.8	7	99.6
Tacoma Pub Schl	WA	186.1	20.9	213	18.3	33.6	115.9	33.6	115.9
Tucson Unified SD	AZ	409	19.8	419	19.3	61	132.7	54	149.9
Washoe County Dist	NV	472	18.7	325	27.1	77	114.4	48	183.5
Williamson Cty Schl	TN	213	13.3	400	7.1	34	83.1	23	122.8
West Aurora SD	IL	120	14.1	101	16.7	21	80.4	13	129.8
Worcester	MA	254	5.0	366	3.4	38	33.2	NA	NA
Averages			14.1		15.2		117.9		176.7