

Jeffco Public Schools Special Education Review

Final Report

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Introduction

Jeffco Public Schools (District) contracted with WestEd to evaluate its Pre K through Age 21 Special Education programs and services for alignment of resources with a focus toward closing the achievement gap. The desired outcome of this review is to improve the instructional practices, services and programs for all students with disabilities being served by the District by providing recommendations:

- To improve outcomes for students with disabilities;
- To improve instructional supports and programs (general and special) as they relate to improved outcomes for students with disabilities; and
- To improve the District's ability to examine the current organization's ability to analyze and mitigate risk or legal liabilities.

Jeffco Public Schools identified three specific tasks to be included within the scope of work for this study including:

1. Review of District resources utilized for improving outcomes for students with disabilities and comparisons to similarly situated school districts with demonstrated improved outcomes for students. This should include but not be limited to:
 - Analyze effectiveness and efficiency of personnel resources and recommend changes.
 - Staffing ratios and recommendations for itinerant and resource services.
 - Staffing ratios and recommendations for Center-based program services.
 - Staffing ratios and recommendations for school psychologists and social workers*, occupational therapists, physical therapists, nurses, and other related service providers.
*Note: school psychologists and social workers are used somewhat interchangeably in Jeffco.
2. Review of all instructional supports and programs (general and special) as they relate to improved outcomes for students with disabilities. This includes but should not be limited to:
 - Review of special education organizational structure as it relates to the working relationships among central office support staff, special education services staff, and school personnel to determine how best to optimize the provision of support to schools.
 - Review of special education organizational structure and staffing as it relates to most efficiently meeting needs of students' Individualized Education Plans (IEPs); comparison to like school districts (staffing models and caseload ranges).
 - Analyze management structure, including position descriptions, expertise and training and recommend any efficiencies, changes, best practices, and organizational structure to enhance programming, services, and leadership capability/needs.
 - Review of central special education staffs' duties related to an appropriate balance between compliance support and instructional support to schools.
 - Review of communication mechanisms and degree of effectiveness among central office staff, special education support staff, and school personnel.
3. Analyze the current organization's ability to analyze and mitigate risk or legal liabilities and provide recommendations for improvements.
 - Analyze federal complaints and mediated agreements.
 - Analyze organization's financial and budgetary model for consistency with special education priorities and legal compliance.
 - Review of the district's continuum of special education service delivery options to promote improved student outcomes through a resource appropriate and cost effective service delivery.
 - Review of the schools' sufficiency of service for students in least restrictive environments.
 - Analyze service delivery models and recommend changes.

- Review the process for determining if a student qualifies for Special Education services to best determine over/under identification and review identification rates by disabilities.

Methodology

WestEd implemented a mixed-methods approach to better understand the range and quality of activities that contribute to higher and more meaningful student outcomes. This approach provided a breadth and depth of data collection procedures (both quantitative and qualitative) and allowed for multi-level analyses. WestEd worked with the district staff to recruit a purposive sample of individuals from the following stakeholder groups from all schools across the district:

- District and site administrators
- General education teachers
- Special education teachers
- Speech and Language Pathologists
- Psychologists
- Social Workers
- Instructional Assistants
- Parent/family members

Classroom observations, IEP reviews, and survey data were analyzed using descriptive statistics (frequencies, percentages, and means) to determine similarities and differences among respondents and across evaluation areas. Focus group and interview data were independently compiled and analyzed, and summarized in the final report. Focused coding techniques were then used to connect themes when possible, and to delineate potential sub-themes within the broader topics.

Data for this evaluation was collected using the following approaches:

- Structured **classroom observations** focused on the use of evidence-based practices in the classroom.
- Key **interviews** with district administrators, site administrators, special education teachers, and general education teachers, captured a depth of knowledge not highlighted in surveys and document/data analysis.
- A series of **focus groups** with key stakeholders (including parents, general education teachers, special education teachers, instructional assistants, related service personnel, speech and language pathologists, psychologists, social workers and site administrators) gleaned a variety of perspectives from staff throughout the district.
- A **review** of IEPs was added to gauge the extent of supports outlined in the IEP.
- Online teacher and parent **surveys** examined practitioner perceptions and beliefs regarding quality of service delivery.
- **Data/document analysis** explored special education growth and compared data to other similar school districts and program staffing and expenses.
- **Financial/Budget Data**

Data Analysis

Quantitative data was collected and analyzed from district documents as well as the Colorado Department of Education's website, and was analyzed and compared at the site, district, and state level for Jeffco Public Schools and the selected comparison districts. Data review included: statewide assessment data at the site and district levels disaggregated by the subgroups of Students with Disabilities (SWD), English Language Learner (ELL) and Free and Reduced Lunch (FRL). Achievement data were examined for variations between the subgroups and the total student populations. In addition, indicators for graduation, dropout and Attendance, and Annual

Measurable Objectives (AMOs) were also compared. District level data on key special education indicators was also reviewed for Jeffco Public Schools and the comparison districts. Each district submits their district data on these indicators to the state each year. The state aggregates the district data to statewide data and submits to the US Department of Education, Office of Special Education Programs for federal monitoring of State Education Agencies (SEAs). The Colorado Department of Education utilizes data submitted by districts on these indicators as part of their monitoring of district special education programs.

Qualitative data were collected from interviews, focus groups, and online surveys with School Site Staff, Parents and District Office Special Education Administrators.

- **Interviews** were conducted with 41 district office general and special education administrators and staff, 35 site level principals, 41 teachers, 11 related service providers.
- Twenty-seven **focus groups** were held with various stakeholders including parents.
- Three **online surveys** were distributed with the following representations:
 - School Site Staff Survey: 34% response rate - 2,200 of 6,421 emails sent (6,607 with 93 blocked)
 - Breakdown of response types: principals-126, assistant principals- 80, general education teacher- 908, special education teacher-364, other teacher-354, school psychologist-44, speech/language specialist-104, nurse-33, occupational therapist-20, physical therapist-9, counselor-46, social worker-72
 - District Office Administrators of Special Education Survey: 60% response rate - 12 of 20 emails sent
 - Parent Of Students Receiving Special Education Services Survey: 9% response rate - 872 of 9320 emails sent (10,507 with 1,187 blocked)

115 **classroom observations** were conducted at 44 schools or programs, which represented all special education program types. A stratified random selection of 100 IEPs were reviewed for overall compliance and completeness. Additionally, WestEd completed a review of available special education policies and procedures and job descriptions.

Identified Areas of Strength

The WestEd review of Jeffco Public Schools identified areas of improvement, which are divided into Key Findings and Recommendations by proposal Tasks. The team also noted several areas of strength. Findings from data analysis, interviews, focus groups, classroom observations, and online surveys with school site staff, district office administrators and parents revealed areas where the district is doing well and should be commended for its efforts to improve results for all students as well as students with disabilities, including:

- District office leadership structure providing support to sites through allocation of Academic Achievement Directors (general education) and Special Education Partners that are paired to provide alignment and cohesive administration to each region
- Inclusion of Special Education Partners in administrative meetings, including their regional Principal meetings
- District office support to schools through the creation of a team of special education coaches, including Board Certified Behavior Analysts (BCBAs), to help address significant academic and behavioral concerns in any site where needed
- District office support for students' social/emotional/mental health needs through allocation of Social Workers and/or School Psychologists to each site
- District recently exited from corrective actions imposed by the Colorado Department of Education due to unresolved issues of noncompliance. Completion of the necessary corrections and systemic issues has been a multi-year effort on the part of Jeffco staff to

implement changes to the system to address the areas of non-compliance. Exiting from non-compliance indicates a successful remediation of the issues and should be celebrated.

- Jeffco's participation in the innovative Juvenile Mental Health Court, in collaboration with other agencies, provides comprehensive wrap-around type of interventions to troubled students in order to keep them in school and out of the criminal justice system.

While some the efforts noted above may not be fully implemented or functioning to the desired level of effectiveness, it is worth noting that the commitment and resources are made available.

Findings and Recommendations By Task

District Enrollment and Comparable Districts

The WestEd review team collected and organized various data points from state and district sources in order to develop a District profile, including comparisons to other districts in the areas of special education and student achievement.

Jefferson County School District is the second largest school district in Colorado, serving a geographic area of approximately 800 square miles with a current enrollment of approximately 86,000 students. The school district employs more than 14,000 full-time and part-time staff members. The district has 92 elementary schools, 19 middle schools, 17 high schools, 10 options schools and 15 charter schools.

The WestEd review team worked with the district to select districts of similar size and structure to use as comparison throughout the study. Table 1 illustrates Jeffco's enrollment of students with and without disabilities compared to five districts of similar size and demographics.

Table 1: Enrollment comparison with similar districts

District	Total Enrollment	SWD age 3-22	% SWD
Cherry Creek	54,499	6,143	11.27%
Denver Public Schools	88,839	9,457	10.65%
Aurora	41,729	4,417	10.58%
CO State	889,006	89,602	10.08%
Douglas County	66,702	6,661	9.99%
Boulder	30,908	3,025	9.80%
Jefferson County	86,547	7,786	9.00%

Source: Colorado Department of Education Pupil Membership Data 2014

Jeffco's percentage of students with disabilities is the lowest among the five comparison districts and the statewide average. Boulder Valley has the highest percentage of students with disabilities with Cherry Creek the next highest. Denver, Adams and Douglas are in the mid range of this comparison as well as statewide averages. Table 2 illustrates the demographic contrast between Jeffco and the five selected comparison districts.

Table 2: 2014 Demographic comparisons with similar districts (ages 3-22)

Overview	State Result	Jeffco	Aurora	Boulder	Cherry Creek	Denver	Douglas Co
All	889,006	86,547	41,729	30,908	54,499	88,839	66,702
FRL*	42%	32%	70%	20%	30%	70%	20%
ELL	14%	8%	39%	10%	11%	33%	5%
SPED	10%	9%	11%	14%	11%	11%	10%
Asian	3%	3%	5%	6%	8%	3%	4%
Am Indian/ Alaskan	1%	1%	1%	0%	1%	1%	0%
Black	5%	1%	18%	1%	12%	14%	1%
Hispanic	33%	24%	54%	18%	19%	57%	14%
White	54%	67%	18%	70%	55%	22%	75%

Source: Colorado Department of Education Pupil Membership Data 2014

*FRL Total Count reported as 857,343

Jeffco has the second highest enrollment of the six comparable districts with only Denver having higher total enrollment. However, Denver has a more diverse population by ethnicity, students who receive free and reduced lunch (70% v. 32%), students who are English language learners (35% v. 8%), and students with Individual Education Programs (11% v. 9%). Although their total enrollment is smaller, Cherry Creek and Boulder are more comparable to Jeffco in ethnicity, free and reduced lunch, English Language Learners and student with IEPs. Taken together, these districts offer Jeffco a lens to compare its performance with similar, although not identical, districts.

Table 3 reports the five-year enrollment of Jeffco students with disabilities compared to Jeffco students without disabilities.

Table 3 Five-year enrollment of students with disabilities in Jeffco

Year	Total Enrollment	SWD 3-22	% SWD	% Change in enrollment	% Change in SWD
2010-11	85,979	7,631	8.88%		
2011-12	85,751	7,621	8.89%	-0.27%	-0.13%
2012-13	85,508	7,608	8.90%	-0.28%	-0.17%
2013-14	85,983	7,620	8.86%	0.56%	0.16%
2014-15	86,547	7,786	9.00%	0.66%	2.18%
Cumulative Change				0.66%	1.99%

Source: Colorado Department of Education Pupil Membership Data 2010-2014

The district experienced a cumulative increase in total enrollment over the five-year period of .66% compared to a 1.99% cumulative increase for students with disabilities. The greatest increase in enrollment for students with disabilities occurred during the 2014-15 school year with an increase of 2.18% and decreases in 2011-12 and 2012-13 making the overall changes in enrollment over the period fairly flat.

Task 1: Review of District resources utilized for improving outcomes for students with disabilities and comparisons to similarly situated school districts with demonstrated improved outcomes for students.

WestEd worked closely with Jeffco Public Schools staff from the Special Education Department to develop the process and format of the review, which included: an analysis of published allocation model, and analysis and comparison of like districts staffing ratios including special education teachers, Para educators, school psychologists/social workers, occupational therapists, physical therapists, nurses, and other related service providers.

The following findings about the adequacy of staffing ratios of itinerant and resource services, Center-based program services, school psychologists/social workers, occupational therapists, physical therapists, nurses, and other related service providers were collected through a comparison and analysis of similar districts personnel resources, as well as qualitative data gathered through interviews, focus groups, surveys and classroom observations.

Jeffco special education personnel allocations

The district provided WestEd with their *Guiding Principles for Allocations of Sped Staff 2014-15*, dated 1/20/2016. The following summarizes the basic allocations each school will receive based on the previous year's December 1 pupil count and does not include allocations for Center programs:

Learning Specialist:

- Elementary schools are allocated on a 15:1 ratio and will have a minimum of a full time teacher (1.0 FTE); buildings with less than 5% special education enrollments may receive reduced allocations.
- Middle schools are allocated on a 19:1 ratio.
- High schools are allocated on a 24:1 ratio.

Speech and Language Pathologist (SLP):

- All elementary schools will have a .5 SLP.
- Middle schools will be allocated a .5 SLP and be responsible for the High School in the Articulation Area (in most cases the .5 will be split).
- In schools where the Center program receives a .5 SLP, the same SLP will be assigned to the school to ensure continuity and minimize travel.

Mental Health (this can be a social worker or a psychologist):

- All elementary schools will have a .5 mental health provider.
 - Elementary schools with 600 or more total population and with 5% or greater special education students are given full time mental health (1.0 FTE).
- Secondary schools will be allocated at 1.0/school. Both Social Workers and School Psychologists will be assigned in an Articulation Area.

Motor staff:

- One Occupational Therapist will be assigned to each articulation area.
- One Physical Therapist will be assigned per quadrant.

It should be noted that several school administrators expressed concern that the new allocation formula was not provided until the start of school so some had to fund positions out of their site budget as positions had already been offered and established. In the interest of communication and adequate planning it may be advisable to provide sites with staff allocations before positions are offered. Additionally, many Principals did not feel the process for determining special education allocations was transparent, for example, in fourteen out of seventeen interviews (82%).

Principals noted:

- *There is no transparent process for teacher allocations.*
- *We need a transparent process for determining staffing numbers and for selecting sites for special populations.*

Comparison of special education personnel ratios with similar districts

Table 4 is a summary of typical special education personnel full time equivalent (FTE) compiled by WestEd based on personnel data received from the Colorado Department of Education (CDE) for December 1, 2015. This data obtained from CDE for the comparison districts is categorized in broad category areas and not broken out by specific sub categories which Jeffco and most districts create based on their own needs. Due to this, the comparison data below is only compared to the broad category level which is similar across all of the districts. The full data is included in Appendix A.

Table 4: Special education personnel and comparing districts

	Jeffco	Aurora	Boulder	Cherry Creek	Denver	Douglas
Special Education Enrollment (2014)	7,786	4,417	4,449	6,143	9,457	6,661
Special Education Teachers	505	281	239	346	674	363
SWD per FTE	15	16	19	18	14	18
Speech, Language, Hearing	131	72	57	118	125	168
SWD per FTE	59	61	78	52	76	40
School Psychologist	52	41	22	73	118	74
SWD per FTE	150	108	202	84	80	90
Social Worker	73	22	17	49	101	41
SWD per FTE	107	201	262	125	94	162
Occupational Therapist	31	21	20	54	31	55
SWD per FTE	251	210	222	114	305	121
Physical Therapist	13	9	3	11	10	1
SWD per FTE	599	491	1,483	558	946	6,661
Health	48	76	71	100	158	112
SWD per FTE	162	58	63	61	60	59
Curriculum Specialist, Consultant, Diagnostician	6	35	6	130	132	
SWD per FTE	1,298	126	742	47	72	113
Teach Assist. Para Prof.	678	213	289	701	489	487
SWD per FTE	11	21	15	9	19	14

Source: Colorado Department of Education

Given the range of enrollment and demographics of the six comparison districts, one way to more accurately compare personnel ratios is by FTE allocated per students with disabilities.

- Jeffco has a low student to teacher ratio when compared to the other districts in the comparison group (range: 14-19) of students with disabilities to **special education teacher** allocations at 15:1 Jeffco is second to the lowest, with Denver the lowest at 14:1; Cherry Creek and Douglas are in the highest range at 18:1 and Boulder is the highest at 19:1.
- Jeffco is in the middle of the districts in student to teacher ratio when compared to the other districts in the comparison group (range: 40-78) of students with disabilities to **Speech and Language Pathologists** at 59:1 with Douglas the lowest at 40:1 and Boulder the highest at 78:1.
- Jeffco has a higher student to teacher ratio when compared to the other districts in the comparison group (range: 80-202) of students with disabilities to **School Psychologists** at 122:1 with Boulder the highest at 202:1 and Denver the lowest at 80:1.
- Jeffco has the second lowest student to teacher ratio when compared to the other districts in the comparison group (range: 94-262) of students with disabilities to **Social Workers** at 107:1 with Boulder the highest at 262:1 and Denver the lowest at 94:1.
- Jeffco is also in the higher student to teacher ratio when compared to the other districts in the comparison group (range: 114-305) of students with disabilities to **Occupational Therapists** at 251:1 with Denver the highest at 305:1 and Cherry Creek the lowest at 114:1.
- Jeffco is in the middle of the districts in student to teacher ratio when compared to the other districts in the comparison group (range: 491-6661) of students with disabilities to **Physical Therapists** at 599:1 with Aurora the lowest at 491:1 and Douglas the highest at 6661:1.
- Jeffco as the **lowest** allocation of **Health** providers when compared to the other districts in the comparison group (all categories) and the highest student to nurse ratio at 162:1 with all of the comparison districts having a ratio of about 60:1.
- Jeffco is second to the **lowest** of the districts in student to teacher ratio when compared to the other districts in the comparison group (9-21) of **Para Professional**/teaching assistants at 11:1 with Cherry Creek the lowest at 9:1 and Aurora the highest at 21:1.
- Jeffco and Boulder are in the **low** range (6-132) of **Curriculum Specialists, Consultants and Diagnosticians** at 6:1 and Cherry Creek and Denver are the highest at 130:1 and 132:1.

To further compare Jeffco's resource allocation on Instruction and Support for **all** students Table 5 reflects a comparison of per pupil spending for Jeffco and the five comparison districts.

Table 5: Per pupil spending for all students comparison to similar districts

District	Instruction and Support	Total Use of Funds
Douglas	5,924	10,602
Jefferson Co.	6,498	10,897
Aurora	6,692	11,483
Denver Public Schools	7,502	13,770
Cherry Creek	7,645	12,276
Boulder Valley	7,713	12,437

The District's spending for instruction and support for all students is the second lowest in the comparison group and is more than \$1,215 less or nearly 19 percent lower than the per pupil rate in Boulder. While Jeffco's spending for instruction and support for all students is in the lower range, there are special education personnel categories that warrant closer evaluation for reasonableness: Health providers, School Psychologists and Occupational Therapists. For context, please note that to support schools in prioritizing mental health for all students, the district has

chosen to give schools increased flexibility by allowing a social worker to be hired instead of a psychologist.

Online survey comments on staffing concerns.

Comments from School staff surveys on top concerns indicated a need for additional staff or improved allocations of staff to sites. About 12% of the comments on recommendations from the Parent survey and 15% of the comments on recommendations from School Staff survey were related to increased staffing or improved allocations. An important finding of this review is that even though Jeffco has a relatively low student to teacher ratio, people expressed strong feelings that more staff is needed. The reviewers have seen this same theme frequently in other districts. The desire for more staff is often the result of a perceived lack of sufficient supports and services that lead to successful outcomes and growth for struggling learners. This is indicative of a lack of a cohesive and aligned system of supports and services that informs stakeholders of services and progress to address the needs of all students and results in the perception that more staff is necessary to provide sufficient supports.

Survey comments on staffing allocations

District Office Staff:

- *We need clear guidelines in how sped staff are to be utilized more FTE for mental health staff across the board (every school 1.0) more support/guidance for programming (i.e. what to use).*

Principals:

- *Not enough resources and support for special education staff - spread too thin to provide optimal support to our students. Allocations for support should be about more than numbers in Enrich. This is not equitable when needs vary school-to-school and caseload-to-caseload.*
- *Not enough resources because many of the Special Ed. staff have multiple sites.*
- *A system-wide or organizational approach/culture that has everyone well informed and on the same page in regard to staffing, budget, resources and programming.*
- *Getting appropriate placement sooner than later in a school year.*

Special Education Teachers:

- *All the changes in administration and school-based staffing have been really stressful for teachers, which is hard on our students. Would be very helpful for there to be a ratio, like 15:1 (stud:tchrs) that all staff knew was steady so there were no surprise cuts again. Stressed out teachers are not as effective.*
- *Increase staffing numbers at SED center programs, take gen ed participation into account when determining how to allocate resources. When SED students are spread out into different gen ed classrooms, the staff is also spread out and is less able to provide support. If our goal is improving inclusion and participation, we need the personnel to support student needs, especially when staff is pulled to support students with more intensive needs.*

General Education Teachers:

- *NOT ENOUGH SPED STAFF TO PROVIDE SERVICES!! Our SPED teachers have a daunting load to carry in this building!*
- *In order to provide Special Education services as intended by IDEA and in a quality manner to fully address and support all students' needs, more staff is needed. .5 positions (especially split between schools) are not what's best for kids or staff members. More school psychologists are needed to fully support students with behavioral and emotional needs. If more money is not spent on personnel that are on the ground and in the classrooms, the district will fail families. We are the front line of support for families. Too many times the fight has been difficult and ultimately lost to get placements and services that a child needs.*

Parents:

- *Provide more support staff to students on IEP's who are integrated into neighborhood schools or programs.*
- *Hire additional SPED teachers and/or paraprofessionals when a school is growing as quickly as ours is...it makes sense that more SPED students coming into the school means a need for more SPED staff.*
- *MORE STAFF! It is clear that the underserved schools are feeling the pressures involved with students on an IEP. Between the classroom/social pressure of managing high needs students, and then piling paperwork to be completed and then fielding questions/concerns from parents, fellow staff members and administration. It's too much and the students are very aware of the struggle. The students shouldn't EVER feel like they are a strain on the system.*

Health and Mental Health specific concerns

Under the Mental Health positions, it is Jeffco's policy that a school can choose to hire a social worker or a psychologist. This can pose a budgetary concern, as well as a programming concern and schools need to fully understand the implications of their decisions. If they hire a social worker, they would then have to bring in a psychologist from another school to complete special education testing. Social workers often don't have the same data/problem solving approach to behaviors and often are not as fully versed in functional behavior assessments, positive behavioral support plans or other behavioral supports unless specifically trained and clearly expected to do these things, and supported in their work.

Specific comments from online surveys concerning related service staff:

- *Working with Social Workers who do not understand special education and do not provide staff with behavior support, or support their special education team, but manipulate the team and cause dysfunctional team interrelations.*
- *Reduced mental health support. They are receiving support from a social worker not a psychologist and services are drastically different.*
- *Train people. Give everyone the same message at the same time. Train, train, train. We have a social worker who also makes incorrect statements regarding IEP and the process. We need better trainers, better messages and better trainings.*

The new allocation formula described above is also a concern for the nurses. Although there are 48 "health" reported in the staffing chart, and in Jeffco these are Registered Nurses (RNs), this number cannot be compared in isolation without understanding the health care model that is in place in the district. In Jeffco, for example, there are no other nursing professionals, such as licensed practical nurses, and there is only one administrator overseeing the entire department. Jeffco has the lowest number of nursing staff and the highest student to nurse ratio by a margin triple that of the comparison districts. The need to have staffing allocation information to the schools in early spring was mentioned by site administrators in interviews and on the online surveys.

The Director of Health Services was interviewed twice as concerns with amount and roles of health staff were expressed by many. In addition, a focus group for nurses was held and several interviews were held with nursing staff at sites. The following summary of findings were triangulated across two or more focus groups or interviews and supported by WestEd observations. A complete description of the issues is contained in Appendix B.

It is important to recognize the role of health services within a large school district like Jeffco. Essentially the district is running a complex health care delivery system within an educational agency. But if you look at this health care system each component is running in deficit mode.

Description of the system: There are 48 District RNs operating a delegated care model where RNs provide training, and support to clinic aids in each school and paraprofessionals in each intensive

center program (SN3) and delegate much of the care to them. The training is supposed to be to “proficiency and competency.” Support should include regular consulting and monitoring with clinic aids and paraprofessionals who are delivering the services.

This model is serving 36 SN3s and all district schools. Students with chronic health needs are not just at Miller – they are in all of these SN3 programs. Jeffco has seen enormous growth of chronic and significant health needs such as allergies, asthma, diabetes, seizures and transplants, as is true in school district everywhere.

Concerns expressed by nursing staff:

- *Vision for staffing for needs of children with significant needs - There has not been a conversation about staffing ratios for special education center-based programs, or a clear discussion about what appropriate staffing levels are for a delegated care model, overall. In Jeffco there is one nurse for every 162 students with disabilities. In our comparison districts there is one nurse for every 60 students with disabilities.*
- *Capacity of current model - The current Director of Health Services oversees health care in 230 sites including preschools, supervises 48 RNs, is responsible for recruitment and hiring, and last year completed 80 performance evaluations in a pay for performance system. She has no medical director. (Many school districts of this size do have a paid medical director. Think of this in the same way school districts rely on legal counsel.)*
- *Risk exposure - There is a concern that the district might not fully understand its exposure to risk within a health services system that is not functioning well. There is a Colorado house bill 219 called Claire’s Law that speaks to schools being held accountable and clarifies that there is not government immunity. There does not seem to be an expectation that district leaders take responsibility for informing school staff, facilities staff and families the role of health services within the school system and what nurses need to be successful. Nurses are concerned about their legal responsibility and license when support decisions are made without them that are not adequate. “District administrators must communicate to site principals the needs nurses have to legally and professionally provide services for individual students. It is not a case of principal preference.”*

Comments from Staff surveys:

- *Nursing staff stretched too thin to meet all the identified needs.*
- *We need more nursing support. Jeffco has ~ 30 nurses and 86,000 students.*
- *Challenges in funding and services offered in areas of mental health and special education students with significant health and physical needs need to be considered. Sometimes it is not simply about the number of IEP students that should determine resources and funding, it should also be about needs overall.*

Parent Survey comments:

- *They need to have staff better trained to handle physical disabilities. Train them to use Hoyer lifts to use gait belts safety equipment and proper care while having to assist with toileting or changing. Not to mention there is no nurse on staff or CNA to give medications when needed.*
- *Communication at a district level is essential. Last year’s proposed nursing cuts created a lot of distrust. This could have been avoided with proper communication.*

The Health Services Department has additional data to share regarding the concerns with current health services in Jeffco.

In addition, classroom observations of indicated a fairly high level of staffing in most center programs with some programs having more staff than students. While many of these programs have students with high levels of needs, an overall process and monitoring would assist with ensuring more equitable staffing across the programs.

Since students with disabilities are general education students first, the services and supports provided by special education should be provided to support “meaningful access to the state’s content standards” services and staffing need to be considered within the context of the district and the overall vision for services for all Jeffco students. Full content of the OSEP Dear Colleague¹ letter with guidance on Free Appropriate Public Education (FAPE) of November 16, 2015 can be found in Appendix C.

1. Recommendations on staffing allocations:

- The executive cabinet and student services department should take the time to develop a deeper understanding of health services concerns and all other staffing issues presented here in relation to other findings raised in this report, to develop a systemic and long-term process to provide services to students with disabilities in an equitable and efficient manner.
 - Creating a process for ongoing communication and engagement around the issues of staffing allocations so that all stakeholders understand that allocations are more than just numbers of staff but need to be paired with appropriate training, processes for identification of support needs and systems for continuous improvement of the processes. For example, build an understanding that through increased collaboration, or multi-tiered systems of support are implemented, existing special education staff can be more effective.
- Create a transparent process for special education staff allocations which involves stakeholder involvement to create a more positive culture. Develop an ongoing process for communicating staffing processes, service delivery contexts, decisions-making and rationale in a timely manner.
 - Ensure that allocation processes include the appropriate professional development and support for staff to ensure that personnel are appropriately trained and following processes and procedures (health and mental health services).
 - Ensure that ongoing communication about allocations, processes and procedures address the differing needs of schools and that allocations at some schools will differ based on student needs. (See recommendation #2 for more discussion).
 - Develop a decision-making guide for sites for allocation of behavioral/mental health personnel that would include the types of skills that each have, roles and types of support provided by each type and a needs assessment to assist sites in deciding what type of position would best support their needs.
- Develop a process to allow more precise tracking of special education personnel expenditures which should include a:
 - Review all special education personnel categories and combine similar positions to reduce the number of categories and align more closely with state and similar district special education personnel categories,
 - Review position descriptions, descriptions of programs and services and develop guidance to sites and staff (including IEP teams) to allow for a better understanding of roles and responsibilities of various positions and types of programs and services across the district.
- Finalize allocations earlier to allow schools to hire in time for the start of the school year to minimize vacant positions.

¹ Dear Colleague Letter on Free and Appropriate Public Education (FAPE), Office of Special Education Programs (OSEP) November 12, 2016

Task 2: Review of all instructional supports and programs (general and special) as they relate to improved outcomes for students with disabilities.

WestEd worked closely with Jeffco Public Schools staff from the Special Education Department to develop the process and format of the review, which included: an analysis of the special education organizational structure and programs as it relates to:

- Most efficiently meeting needs of students' IEPs; and a comparison to like school districts academic performance, staffing models and caseload ranges.
- The management structure, including position descriptions, expertise and training and recommend any efficiencies, changes, best practices, and organizational structure to enhance programming, services, and leadership capability/needs.
- Review of central special education staffs' duties related to an appropriate balance between compliance support and instructional support to schools.
- The working relationships among central office support staff, special education services staff, and school personnel to determine how best to optimize the provision of support to schools.
- Review of communication mechanisms and degree of effectiveness among central office staff, special education support staff, and school personnel.

The following findings were collected through quantitative data including student achievement data for Jeffco and comparisons districts, analysis of the survey data and a selected sampling of IEPs from Jeffco.

Jeffco Student Achievement

Student achievement over a five-year period was reviewed to determine if growth had occurred. Table 6 illustrates the percentage of Jeffco elementary students who score at proficient or above in reading over a five-year period, disaggregated by all subgroups of students; English language learners, students who receive free or reduced lunch, students who have an IEP, and minority students. The gap between the achievement of "All" students and "SPED" students is highlighted in red to determine whether or not there has been any change over time.

Table 6: Jeffco achievement by sub group in reading for elementary students

	2009-10	2010-11	2011-12	2012-13	2013-14
All	77%	78%	79%	79%	79%
SPED	30%	32%	31%	33%	32%
Gap	47%	46%	48%	46%	47%
ELL	56%	58%	60%	61%	61%
FRL	61%	62%	64%	64%	62%

Source: Colorado Department of Education Data Center

The reading performance of students with disabilities is the lowest of all sub groups and has remained fairly flat, as have the scores of all students groups, over the five-year period. The gap has also remained fairly flat as has and actually increased a percentage point between school years 2012-13 and 2013-14.

Table 7 illustrates the percentage of Jeffco elementary students who score at proficient or above in mathematics over a five-year period, disaggregated by all students, English Language Learners, students who receive free or reduced lunch, students who have an IEP, and minority students.

Table 7: Jeffco achievement by sub group in mathematics for elementary students

	2009-10	2010-11	2011-12	2012-13	2013-14
All	73%	74%	73%	73%	72%
SPED	30%	31%	30%	30%	29%
Gap	43%	42%	43%	43%	43%
ELL	56%	59%	58%	59%	58%
FRL	53%	56%	56%	55%	54%

Source: Colorado Department of Education Data Center

The mathematics performance of students with disabilities is the lowest of all sub groups and have also remained fairly flat over the five-year period and decreased slightly between school years 2012-13 and 2013-14. This same pattern is seen in the "All" scores as well.

Table 8 illustrates the percentage of Jeffco Middle School students who score at proficient or above in reading over a five-year period, disaggregated by all students, English language learners, students who receive free or reduced lunch, students who have an IEP, and minority students.

Table 8: Jeffco achievement by sub group in reading for middle school students

Category	2009-10	2010-11	2011-12	2012-13	2013-14
All	76%	75%	76%	77%	77%
SPED	25%	26%	27%	27%	26%
Gap	51%	49%	50%	50%	51%
ELL	49%	53%	55%	55%	55%
FRL	54%	54%	57%	59%	59%

Source: Colorado Department of Education Data Center

The reading performance of students with disabilities is the lowest of all sub groups and actually decreased a percentage point between school years 2012-13 and 2013-14. The gap is even larger than those seen in elementary schools with a 50% gap persisting and increasing.

Table 9 illustrates the percentage of Jeffco Middle School students who score at proficient or above in mathematics over a five-year period, disaggregated by all students, English language learners, students who receive free or reduced lunch, students who have an IEP, and minority students.

Table 9: Jeffco achievement by sub group in mathematics for middle school students

Category	2009-10	2010-11	2011-12	2012-13	2013-14
All	59%	62%	62%	63%	64.30%
SPED	16%	17%	16%	17%	16%
Gap	44%	46%	45%	46%	49%
ELL	37%	42%	46%	45%	44%
FRL	35%	39%	38%	41%	42%

Source: Colorado Department of Education Data Center

The mathematics performance of students with disabilities is the lowest of all sub groups and has decreased between 2012-13 and 2013-14, while the mathematics performance for all students increased over the previous year. Over the five-year period, the performance of "All" students

increased over 5% along with increases for English language learners and students who receive free or reduced lunch by 7%.

Table 10 illustrates the percentage of Jeffco high school students who score at proficient or above in reading over a five-year period, disaggregated by all students, English language learners, students who receive free or reduced lunch, students who have an IEP, and minority students.

Table 10 Jeffco achievement by sub group in reading for high school students

Category	2009-10	2010-11	2011-12	2012-13	2013-14
All	73%	73%	73%	74%	72.40%
SPED	24%	23%	22%	25%	23%
Gap	48%	50%	51%	49%	49%
ELL	44%	46%	50%	52%	52%
FRL	51%	52%	53%	56%	53%

Source: Colorado Department of Education Data Center

The reading performance of high school students with disabilities is the lowest of all sub groups but increased by 3% during the 2012-13 school year and then declined by 2% in 2013-14. However, all high school students and sub groups experienced a decline in reading performance in 2013-14.

Table 11 illustrates the percentage of Jeffco high school students who score at proficient or above in mathematics over a five-year period, disaggregated by all students, English language learners, students who receive free or reduced lunch, students who have an IEP, and minority students.

Table 11 Jeffco achievement by sub group in mathematics for high school students

Category	2009-10	2010-11	2011-12	2012-13	2013-14
All	45%	46%	43%	45%	46.10%
SPED	7%	8%	6%	6%	7%
Gap	38%	37%	37%	40%	39%
ELL	22%	22%	21%	28%	23%
FRL	23%	23%	24%	23%	23%

Source: Colorado Department of Education Data Center

The mathematics performance of students with disabilities is the lowest of all sub groups but increased by 1.3% during the 2013-14 school year but still remains in single digits.

Student achievement by sub group in comparison districts

To determine how Jeffco's academic performance compares to similar districts, the following tables illustrate how Jeffco's 2013-2014 achievement data for students who score at proficient or above compare to similar districts.

Student achievement in reading and math was reviewed for Jeffco and the comparison districts for overall achievement students who score at proficient or above in reading and mathematics, disaggregated by all students, English Language Learners, students who receive free or reduced lunch, students who have an IEP, and minority students.

**Table 12: Reading and math proficiency for all Jeffco students and comparable districts
Overall Reading 2013-14**

Category	State Target	State	JeffCo	Aurora	Boulder	Cherry Creek	Denver	Douglas
All	71%	69%	76%	47%	82%	78%	57%	81%
SPED		21%	27%	8%	39%	30%	13%	32%
Gap		48%	49%	39%	43%	48%	44%	49%
ELL		42%	56%	38%	43%	59%	44%	52%
FRL		52%	58%	41%	53%	58%	45%	57%

Overall Math 2013-14

Category	State Target	State	JeffCo	Aurora	Boulder	Cherry Creek	Denver	Douglas
All	51%	56%	60%	49%	80%	79%	58%	80%
SPED		17%	17%	12%	43%	35%	16%	37%
Gap		39%	43%	36%	37%	43%	42%	43%
ELL		38%	42%	44%	46%	65%	51%	52%
FRL		40%	39%	4%	43%	59%	49%	54%

Source: Colorado Department of Education Data Center

Table 12 illustrates the range of overall achievement in reading was 47-82% with a state target of 71%. Jeffco scored in the lower mid range at 76%. The achievement gap between students with and without disabilities was between 40-49% with Jeffco in the upper range tied with Douglas.

The range of overall achievement in math (also illustrated in Table 12) was 49-80% with a state target of 51%. Jeffco scored in the lower mid range at 60%. The achievement gap between students with and without disabilities was between 36-43% with Jeffco in the upper range tied with Cherry Creek and Douglas.

Table 13 Reading and math proficiency for Jeffco elementary students and comparable districts**Elementary Achievement – Reading 2013-14**

Category	State Target	JeffCo	Aurora	Boulder	Cherry Creek	Denver	Douglas
All	71%	79%	47%	82%	78%	57%	81%
SPED		32%	7%	39%	30%	13%	32%
Gap		47%	40%	43%	48%	44%	49%
ELL		61%	38%	43%	59%	44%	52%
FRL		62%	41%	53%	58%	45%	57%

Elementary Math – Reading 2013-14

Category	State Target	JeffCo	Aurora	Boulder	Cherry Creek	Denver	Douglas
All	51%	73%	49%	80%	79%	58%	80%
SPED		29%	12%	43%	35%	16%	37%
Gap		43%	36%	37%	43%	42%	43%
ELL		58%	44%	46%	65%	51%	52%
FRL		54%	4%	43%	59%	49%	54%

Source: Colorado Department of Education Data Center

Table 13 illustrates the elementary achievement for reading and math for Jeffco and the comparison districts. Jeffco was in the upper mid range (47-81%) at 79% for all students in elementary reading and for students with disabilities (7-39%) at 32%. The achievement gap for students with and without disabilities was similar for all districts with a range of 40-49% with Jeffco at 47%.

Jeffco was in the mid range (49-80%) at 73% for all students in elementary math and for students with disabilities (12-43%) at 29%. The achievement gap for students with and without disabilities was similar for all districts with a range of 36-43% with Jeffco at 43%.

Table 14 Reading and math proficiency for Jeffco middle school students and comparable districts**Middle School Achievement - Reading 2013-14**

Category	State	JeffCo	Aurora	Boulder	Cherry Creek	Denver	Douglas
All	71%	77%	46%	82%	76%	54%	81%
SPED		26%	8%	35%	25%	11%	28%
Gap		51%	38%	47%	51%	43%	53%
ELL		55%	38%	40%	56%	42%	49%
FRL		59%	40%	53%	56%	44%	55%

Middle School Achievement - Math 2013-14

Category	State	JeffCo	Aurora	Boulder	Cherry Creek	Denver	Douglas
All	51%	64%	34%	72%	68%	47%	70%
SPED		16%	5%	22%	17%	9%	18%
Gap		49%	28%	49%	50%	38%	53%
ELL		44%	28%	32%	55%	39%	37%
FRL		42%	28%	39%	47%	37%	38%

Source: Colorado Department of Education Data Center

Table 14 illustrates the middle school achievement for reading and math for Jeffco and the comparison districts. Jeffco was in the upper mid range (46-82%) at 77% for all students in middle school reading and for students with disabilities (8-35%) at 26%. The achievement gap was slightly wider in all districts for students with and without disabilities with a range of 38-53% with Jeffco at 51%.

Jeffco was in the lower mid range (34-72%) at 64% for all students in middle school math and in the mid range for students with disabilities (5-22%) at 16%. The achievement gap for students with

and without disabilities was wider for math for all districts with a range of 28-53% with Jeffco again in the mid range.

Table 15: Reading and math proficiency for Jeffco high school students and comparable districts

High school Achievement - Reading 2013-14

Category	State	JeffCo	Aurora	Boulder	Cherry Creek	Denver	Douglas
All	71%	72%	50%	77%	75%	53%	78%
SPED		23%	8%	27%	27%	10%	23%
Gap		49%	42%	50%	48%	43%	55%
ELL		52%	43%	34%	54%	43%	48%
FRL		53%	45%	47%	58%	43%	56%

High school Achievement - Math 2013-14

Category	State	JeffCo	Aurora	Boulder	Cherry Creek	Denver	Douglas
All	51%	46%	21%	53%	47%	27%	50%
SPED		7%	3%	7%	10%	3%	8%
Gap		39%	18%	46%	37%	24%	42%
ELL		27%	16%	14%	32%	19%	25%
FRL		23%	16%	19%	26%	17%	25%

Source: Colorado Department of Education Data Center

Table 15 illustrates the high school achievement for reading and math for Jeffco and the comparison districts. Jeffco was in the mid range (50-78%) at 72% for all students in high school reading and for students with disabilities (8-27%) at 23%. The achievement gap for students with and without disabilities had a range 43-55% with Jeffco in the mid range at 49%.

Jeffco was in the mid range (21-53%) at 46% for all students in high school math and in the mid range for students with disabilities (3-10%) at 7%. The achievement gap for students with and without disabilities was wider for math for all districts with a range of 18-46% with Jeffco again in the mid range at 39%.

Other Indicators of Academic Success

Other indicators of academic success reviewed for Jeffco students with disabilities included graduation dropout rates. Graduation and dropout rates are the ultimate indicator of academic success over the years. Improving academic rates should result in improved graduation rates and lower drop out rates.

Table 16 compares graduation rates for students with disabilities for Jeffco and the comparison districts.

Table 16: Graduation Rate for SWD for Jeffco and Comparison Districts 2013-14 Data

SWD Indicators 2013-14 Data	State Target	State Result	Jeffco	Aurora	Boulder	Cherry Creek	Denver	Douglas Co
Graduation Rate 4 yr. cohort	>80%	53.81%	61.24%	26.91%	24.36%	61.03%	36.95%	70.77%

Source: Colorado Department of Education website

<https://www.cde.state.co.us/cdesped/AUperformanceprofiles>

None of the districts in the comparison met the 80% graduation target for students with disabilities. Douglas had the highest graduation rate with Jeffco following and Cherry Creek close behind. Denver was in the midrange with Boulder having the lowest graduation rate for students with disabilities. This finding is surprising given Boulder's higher performance in reading and math assessments, which are typically predictors of graduation success. A closer look at how general diplomas are awarded to students with disabilities by each district may offer insight into this anomaly.

Table 17 reflects the dropout rate for students with disabilities in Jeffco and the comparable districts.

Table 17: Dropout rate for Jeffco and comparable district's SWD – 2013/14

SWD Indicators 2013-14 Data	State Target	State Result	Jeffco	Aurora	Boulder	Cherry Creek	Denver	Douglas Co
Dropout Rate	<26.2%	25.31%	25.85%	41.25%	16.52%	24.36%	42.33%	19.25%

Source: Colorado Department of Education website

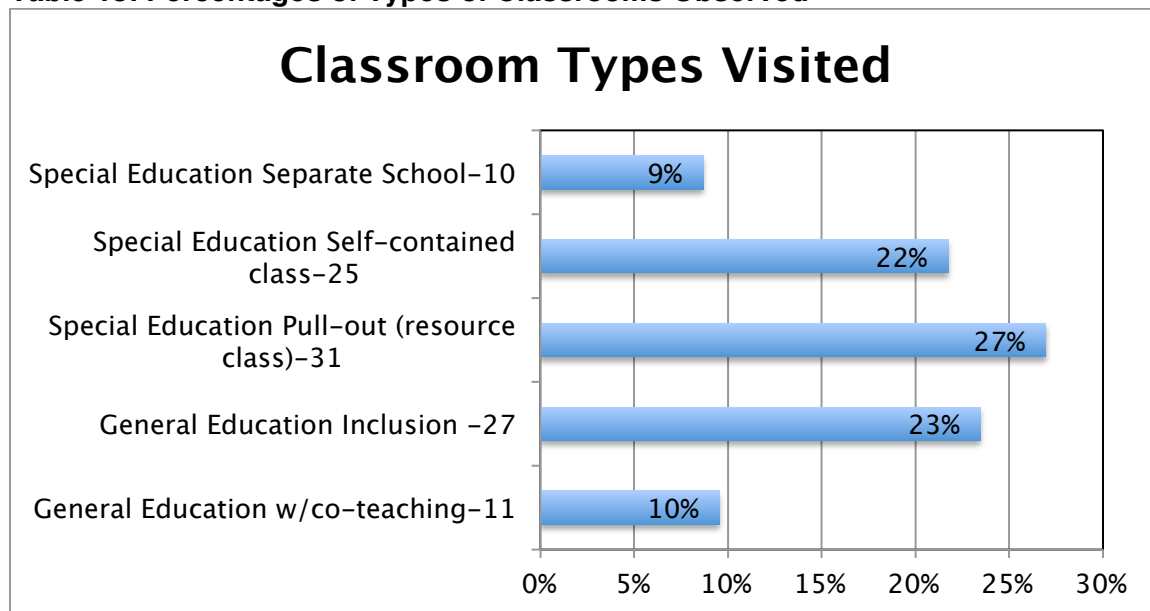
<https://www.cde.state.co.us/cdesped/AUperformanceprofiles>

The dropout rate is a score that should be at or below the state target (26.2%). Table 11 shows that Jeffco's dropout rate for students with disabilities is below the state target but is third behind Boulder and Douglas. Denver and Aurora had the highest dropout rate for students with disabilities.

Classroom Observations

To gain first hand insight into the instructional environment that Jeffco students with disabilities are engaged, 115 classroom observations were conducted using a common protocol. Classrooms ranged from preschool to programs for 18-22 year old students. Just over half of the classrooms observed (58%) were separate classrooms for students with disabilities only, i.e., Resource room, self-contained class, or separate school. The other classrooms observed (33%) were general education classes with students with disabilities included. Table 18 below shows the breakdown of the types of classes visited.

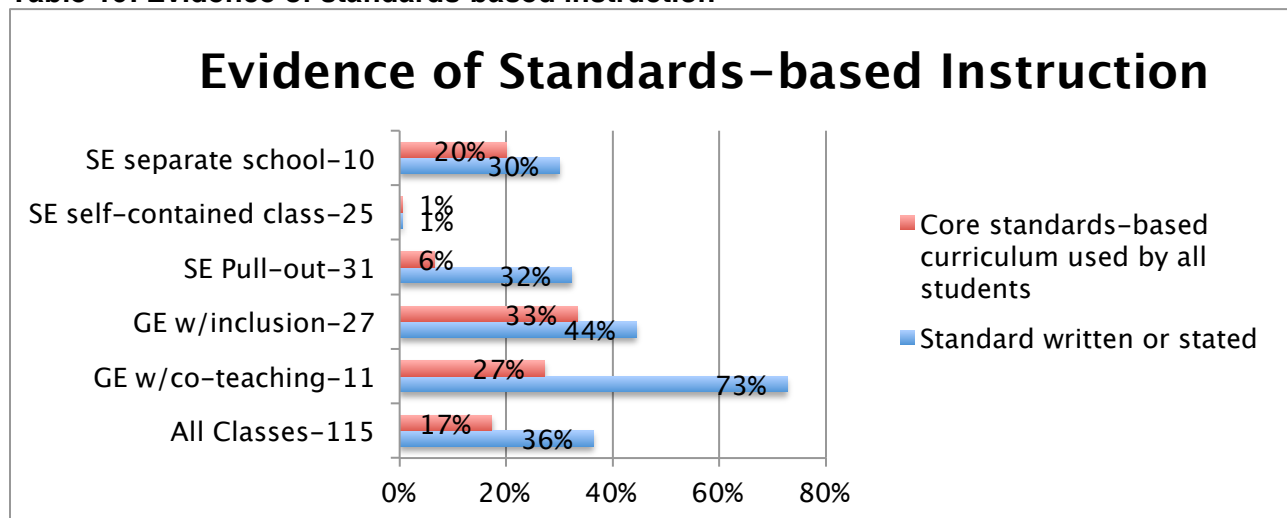
Table 18: Percentages of Types of Classrooms Observed



In order for students to make progress toward grade level standards, students need to have access to instruction in the standards. To identify what students with disabilities are being taught, observers rated the presence or absence of a stated or written standard, and the presence or absence of standards-based core curriculum. Table 19 below illustrates that of the 115 classrooms (All classes row) observed, only 36% (42) had evidence of a written or stated standard and 64% (73) had no evidence of a grade level standard being taught, and 83% (96) were not observed using grade level standards-based curriculum.

Table 19 also illustrates the data when disaggregated by the type of class observed. The general education classes had the highest amount of instruction aligned to standards (73% GE with co-teaching and 44% GE with inclusion) but the use of standards-based curriculum instructional materials by all students drops to 27% in the GE classes with Co-teaching and 33% in the GE with. It is important to note that overall standards-based curriculum was not apparent in 83% of the classes observed.

Table 19: Evidence of standards-based instruction



Survey data also support the need for standards-based instruction.

Special Education Teacher Comments:

- *I believe that SSN and center-based programs need support to move towards more standards-based instruction.*
- *We need help in writing standard based IEPs.*

Principal Comments:

- *Limited access to standards and conceptual teaching and learning*
- *There is limited access to standards and conceptual teaching and learning for SWD.*
- *They are not held to the same standards. Because they are labeled special ed, they are seen as not being able to do the same work as students in the same grade level.*
- *Maintain a good balance between necessary accommodations to help special education students succeed and reach their full potential while holding up to standards that they can indeed achieve. Limit the amount of standard -based curriculum modifications, so that their curriculum is as close to the general education curriculum as possible based on their disability and needs.*

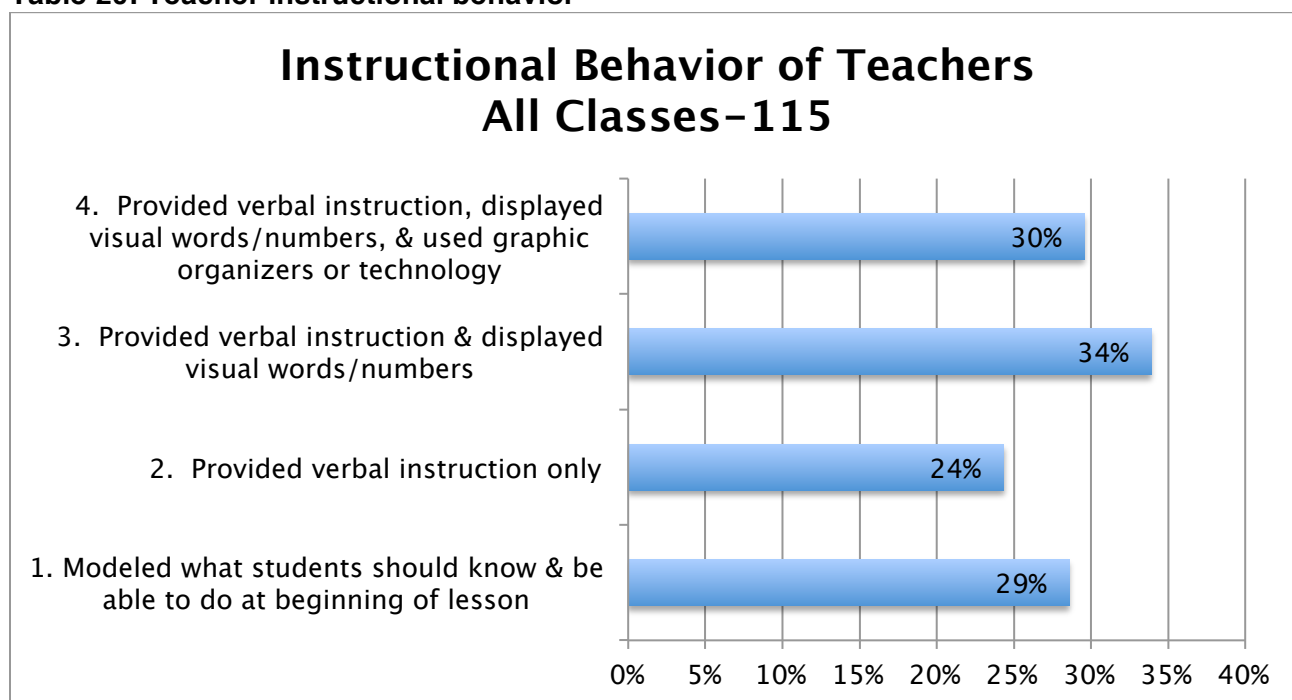
Limited access to core, standards-based curriculum with the appropriate supports may be a contributing factor to the achievement gap and the low achievement of students with disabilities.

Access to core standards-based curriculum and instruction with appropriate supports, accommodations and high expectations has been shown to improve the outcomes for students with disabilities.

Instructional Behavior

To identify how students with disabilities are being supported instructionally, observers rated the occurrence of some of the instructional methodologies known to support learning for students with disabilities. Results are illustrated in Table 20.

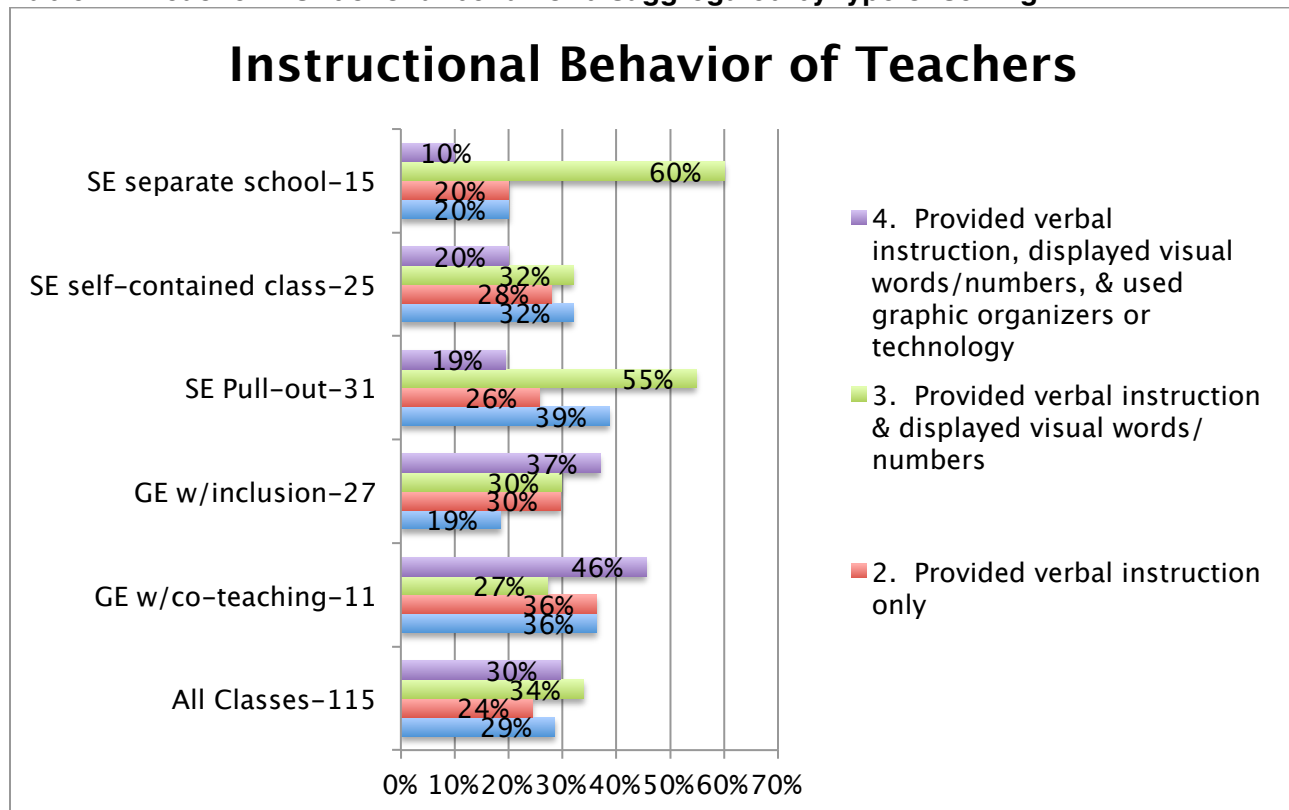
Table 20: Teacher instructional behavior



This data in Table 20 indicate that the use of multimodal instructional methods (#1) was evident in 30% of the classrooms observed, and that the principal mode of instruction is (#3) verbal with some written example typically on the board (34%).

Table 21 illustrates the data disaggregated by the type of setting to determine the frequency of supportive instructional behaviors in each setting. The multimodal approach (strategy #1) of providing verbal instruction, displayed visual words/numbers, and using graphic organizers or technology occurred most frequently in general education settings (GE w/Co-teaching-43% and GE inclusion – 37%). The highest use of the strategies strategy #3 (verbal instruction and displayed visual) was found in the special education classes (60% separate school and 55% pull-out). Conversely, the use of a more traditional model of verbal instruction only (#2) is found most frequently in the general education classes (36% in GE with co-teaching and 30% in GE w/inclusion).

Table 21: Teacher instructional behavior disaggregated by type of setting



The observers also looked for the amount of instructional supports provided to students to assist with learning. These types of supports are frequently used to increase the access and engagement to instruction thus increasing the achievement of students who use them.

Table 22: Instructional Supports found in all settings

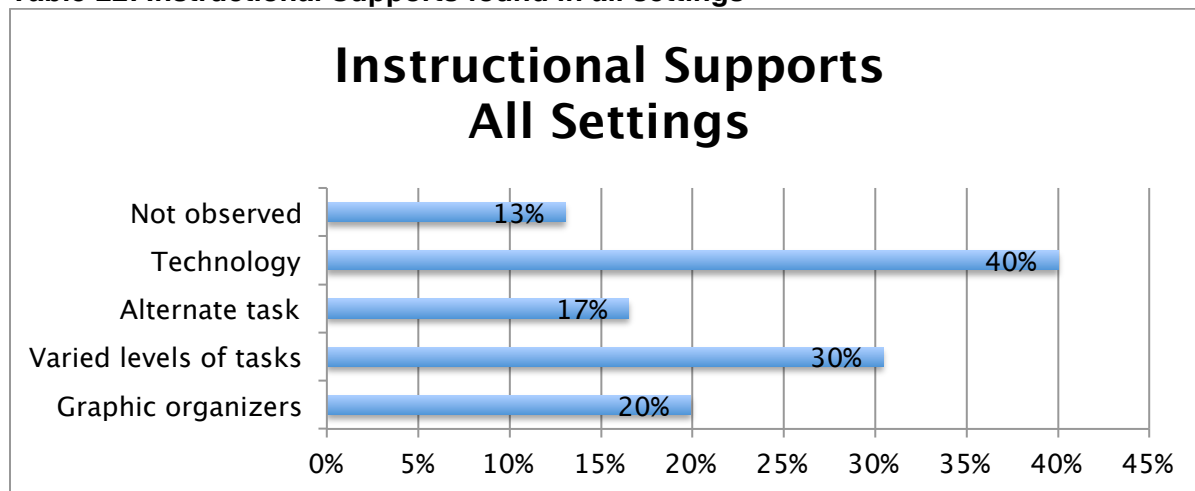
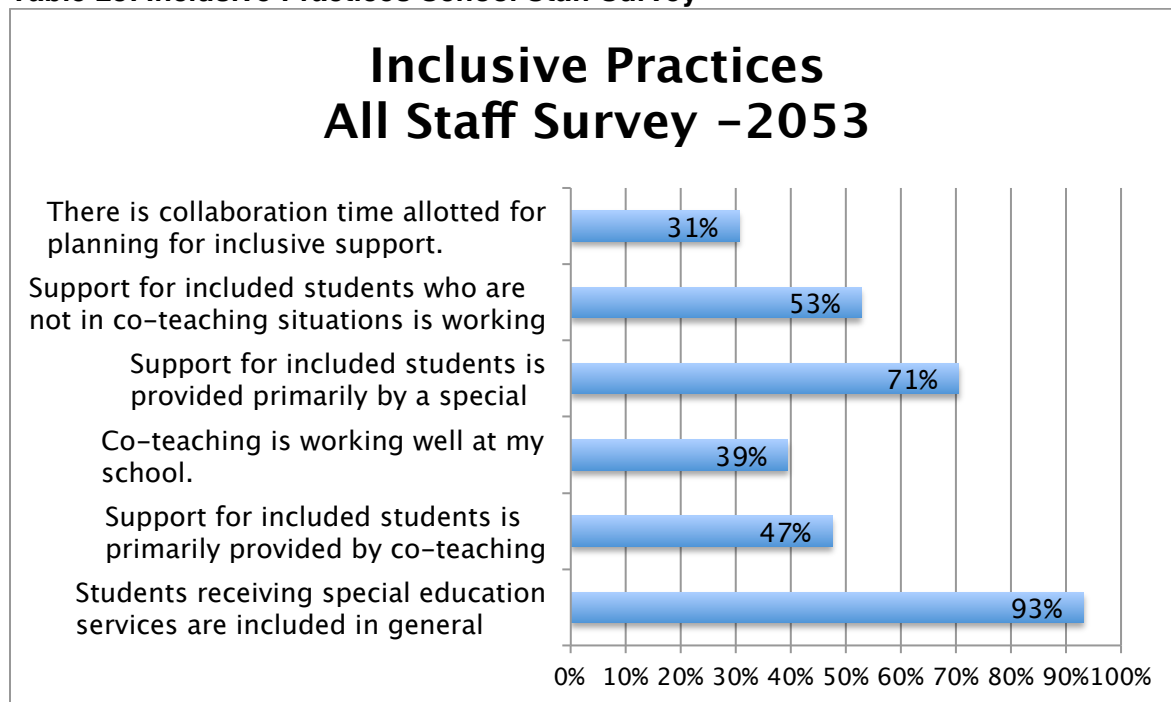


Table 22 illustrates that the overall use of these supports was fairly low across all classes with the use of technology occurring most frequently at 40% and varied levels of tasks occurring in 30% of classes. A lack of the use of any types of supports was found in 13% of the classes.

Online Surveys

Online surveys were conducted to provide an opportunity for feedback from stakeholders across the district. Three surveys were conducted; School site staff; parents of students receiving special education services and district office special education administrators and responses on instructional supports and programs were included in each survey. The online surveys contained questions with quantitative responses as well as qualitative responses from open-ended comments.

Table 23 illustrates the school site staff quantitative responses to questions addressing inclusive practices in schools. While 93% of staff feel that students receiving special education supports are included in general education classes, the adequacy of the supports students are receiving within general education was not as high with 53% agreeing that supports for students included but not in co-teaching were appropriate and only 39% agreeing that co-teaching was working well. It is also important to note that only 31% of staff feel that there is collaborative time allocated for planning for inclusive support. Adequate planning time between general education and special education staff is critical to the success of the provision of appropriate support for students in inclusive settings.

Table 23: Inclusive Practices School Staff Survey


Comments from surveys also addressed the inclusive practices across Jeffco.

Principal Comments:

- I believe that the major challenge is finding the time to have teachers collaborate with one another about core instruction and interventions.*
- General Ed staff has the belief that special ed students need to be educated and taken care of by the historic "pull out" model. The programs used in "pull out" don't align to core and there is limited communication to build capacity between the interventionist and the core teacher. We are working in isolation. We also have limited resources to meet the needs of special ed students (service hours) and build in collaborative co-teaching time.*

Teacher Comments:

- One challenge that exists is receiving grade level content. There does not seem to be enough effective structures to support SPED students in core curriculum so they may not be receiving grade level content from highly qualified teachers (secondary situations).*
- We do not have enough adult support (SPED) teachers to assist students in general education classes who are trying to learn in environments that are not restricted. This can lead to frustration for students who are struggling to access curriculum and for the teachers who are trying to help them.*
- Training for supporting students in inclusive settings and co-teaching with Para-educators needs to be given for general ed teachers!*

Parent Comments:

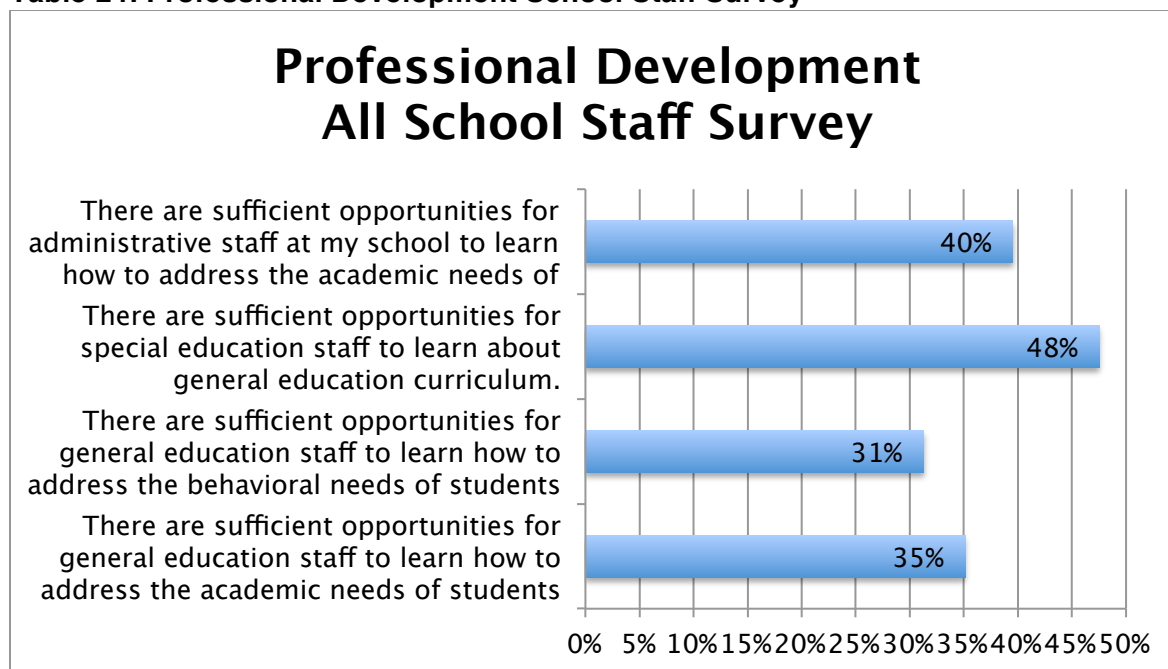
- When I have had difficulties it has mostly been with general education staff who are not supporting my child's accommodations. That maybe due to lack of resources or knowledge.*
- They are average in my opinion. It is almost all pull out separate curriculum or isolated skills. There is very little inclusion or modification of classroom curriculum support . So my son in addition to his disabilities also has to navigate coming and going from a classroom, joining lessons that he has missed parts of and making way more transitions than typical children.*

- *Provide/encourage adequate time for communication between special ed teacher and classroom teachers so that the best strategy can be implemented with the same approach and language. The support can only be fully realized with true team support when a child has a learning disability. Too often the team members are each presenting things in a different way to these children.*

Professional Development

Online surveys and interviews also explored the adequacy of professional development to support the instruction and learning of students with disabilities. Table 24 illustrates the responses of school staff to questions on sufficiency of professional development opportunities.

Table 24: Professional Development School Staff Survey



Less than half of school staff agrees that there were sufficient opportunities for professional learning with the lowest scores concerning the opportunities for general education teachers and administrators to learn to address academic and behavioral needs of students receiving special education services.

Comments from surveys were also directed at the need for additional professional learning opportunities. 25% of the comments from school staff on issues and recommendations and 13% of comments from parents were concerning the need for training/professional development.

Principal comments:

- *The lack of partnership and learning between sped teachers/staff and classroom grade level content teachers with PD around accommodating and differentiating instruction for sped students.*
- *More professional development is needed to support schools and specialized programs. Clear processes in place to evaluate programming needs of students. Full time mental health support at elementary school.*
- *Our special ed teachers are often trained more on how to write IEPs than on what makes for rigorous teaching and learning.*
- *Provide training to gen ed teachers relating to implementation of accommodations within the gen ed classroom.*

General education teacher comments:

- *The co-teaching model is new and needs a lot more support. This would include planning time and professional development.*
- *The district needs to provide more professional development for teachers who have students with emotional problems that are assigned to their classrooms.*
- *General Education teachers are doing all the planning for the special education teachers and then they come in and assist us with the kids. That is more of a paraprofessional's job, instead of a professional licensed teacher's job. Also, ideally coteaching and collaborating on lessons is perfect. Realistically, it is extremely difficult for sped to plan with teachers when they don't have planning time with us. Therefore, we general ed teachers do all the planning for their lessons. The structures in place do not support the ideal for collaborative lesson planning.*
- *There is no professional development for teachers. I have taken multiple classes about ALP students, but cannot find any comparable classes to help me learn how to teach special ed students. I don't understand. I have asked the special ed department and my coach for help finding these. They don't seem to exist???*
- *Adopt a model or two of co-teaching that is consistent across the district and across interventions (SpEd, ESL, etc.) Hold yearly training opportunities for all teachers to be trained in the co-teaching model(s).*

Special education teacher comments:

- *Site based support from the district - training for general education teachers on the IEP process and how it is monitored - time to plan for students with specific educational needs - placing effective instructors in buildings - overall professional development.*
- *There is a lack of general educator professional development for differentiation within the classroom when SPED support is not available.*
- *More training /guidelines on evidence based practices, interventions, and resources are available and supported by Jeffco. In addition, more training on effective collaborative planning and co-teaching.*
- *Well trained staff: Gen Ed teachers and support staff should have positive behavioral intervention and support training 's, so they feel confident to help support SPED students and keep the class instruction going forward for the rest of the students.*

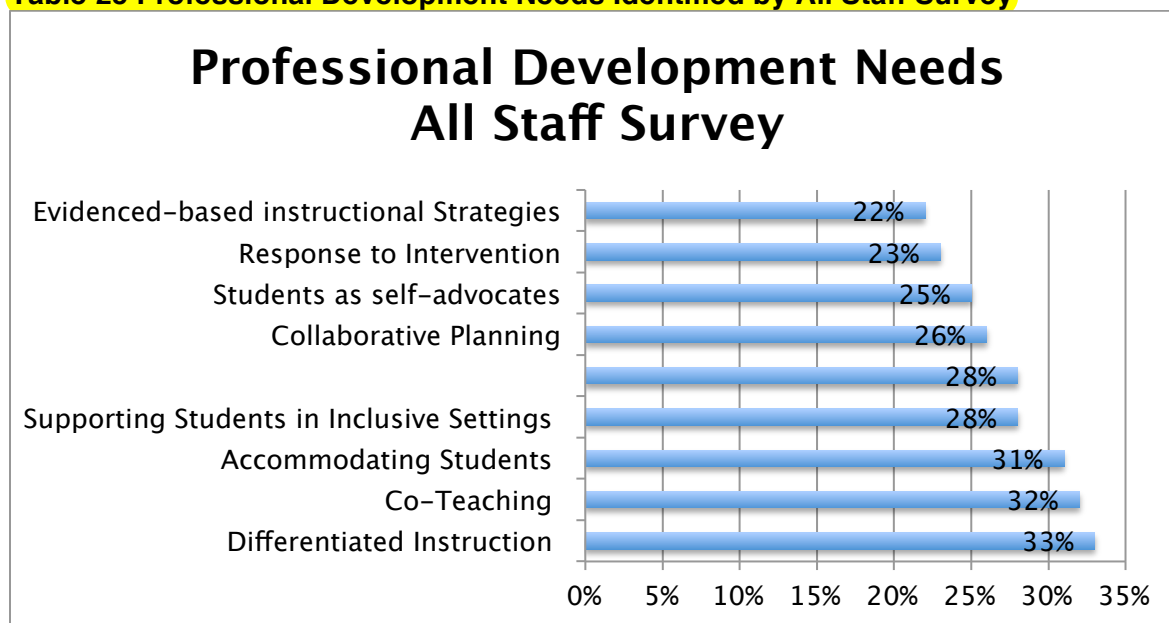
Parent Comments:

- *General education teachers need to be better trained in working with students with disabilities. More training !!!*
- *Training para educators to be more effective. Offering behavior training to all staff. Education in behavior "therapy" is evidence based and can be generalized over all populations with any kind of dev. delay.*
- *Better/more training for general education teachers about how to work with and support students with special needs.*
- *More sped training for new principals.*
- *Unified/universal training and programming for ALL STAFF who work with sped students across the district to effectively prepare disabled students for transition from the school setting.*
- *More training for teachers to understand IEP goals, developmental delays, processing disorders, and all other learning or emotional disabilities students may have. I had to ask my child's teacher to read my child's IEP. I feel the teacher can not help my child if she does not understand learning disabilities.*

Table 25 illustrates the responses from school staff to the question of their top professional development needs. The list includes the aggregate ratings for all staff which varies a bit when disaggregated by staff roles. It is important to note that all of these topics included here

received more that 20% of the ratings and area all areas that address the ability of staff to appropriately support student growth.

Table 25 Professional Development Needs Identified by All Staff Survey



The findings in this section on instructional practices suggests that the absence of instructional methodologies like Universal Design for Learning (UDL) or Marzano's nine effective instructional strategies, which incorporate multiple modes of teacher presentation, explicit instruction, and the use of nonlinguistic representations, may be contributing to the low and flat achievement of students with disabilities and the achievement gap between students with disabilities and their typically-developing peers. Developing a differentiated system of PD that allows learning to occur in a collaborative manner as well as address the immediate and long term needs of staff.

Promising practices were observed by reviewers at the classroom and site level as well as across the district. Some of these practices included:

- Classes where co-teaching was working well.
- Classes where students were being included effectively in general education.
- Schools where the support structures (special education teachers, assistants, behavioral and mental health specialists) were effectively working in collaboration.
- Schools where MTSS or Rtl processes were effectively functioning.
- Schools where teacher collaboration around data and instructional support was occurring.
- Sites where District office special education administrative staff is working well with site administrators with increased collaboration.

It would be helpful for the district to identify places where promising practices exist and determine how to best share these across the district. One way to do this would be to identify places where students are having success and develop mini case studies of the practices and how they were developed.

2. Recommendations for improving instructional practices:

- Professional development needs to be offered in a systematic manner that targets the critical learning needs of general and special education teachers so that they can build the skills necessary to support the learning of all students along with the specialized needs of students with disabilities. Ongoing professional development with coaching, optimization of existing offerings, and time for collaborative planning will assist with sustainability and effectiveness and will provide a long-term costs.
 - Providing professional development to general special education staff on the use of Universal Design for Learning (UDL) and other evidence-based methodology would help close the achievement gap by making grade level standards-based instruction accessible to diverse learners.
 - To close the achievement gap in reading between students with and without disabilities provide professional development and resources to fully implement, to both general education and special education teachers, on evidence based strategies, such as the Colorado READ Act (HB12-1238) (and include students with disabilities in the initiative).
- Explore ways to increase the amount of collaborative planning time teachers and other staff has to discuss and plan to meet the needs of all of the students. Optimize the structures that are in place for ongoing learning, such as professional learning communities.
- Investigate the programs and practices within Jeffco that are successful and share across the system; make specific plans to scale them up.

Individualized Education Program (IEP) Review

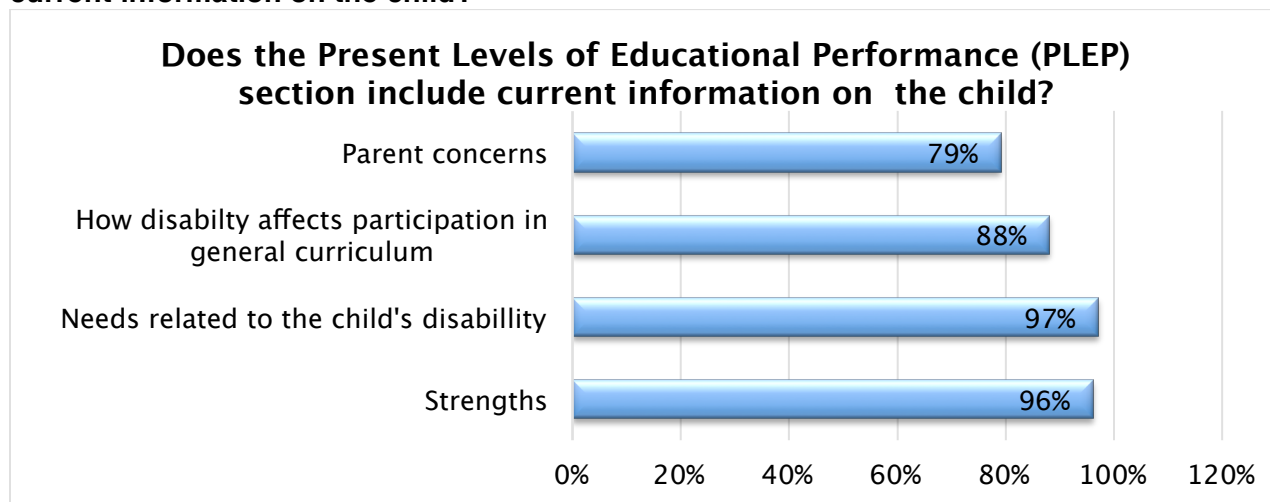
WestEd conducted a comprehensive review of IEPs for 100 students, using names provided by the district. The students were from 60 different schools representing high school, middle school, elementary school, preschool, Montessori and Academies were examined for compliance and best practice and included eleven disability categories. The IEP Review examines the document for basic compliance but also includes questions that provide indicators, which lead to improved academic results.

For example, in the area of development of an IEP based on assessment data, IEP Review Protocol question #5 asks:

Does the Present Levels of Educational Performance (PLEP) section include current information on the child?

As Table 26 indicates, the majority of IEP contained information related to the student's strengths, needs related to the child's disability, how the disability affects participation in the general curriculum, and parent concerns.

Table 26: Does the Present Levels of Educational Performance (PLEP) section include current information on the child?

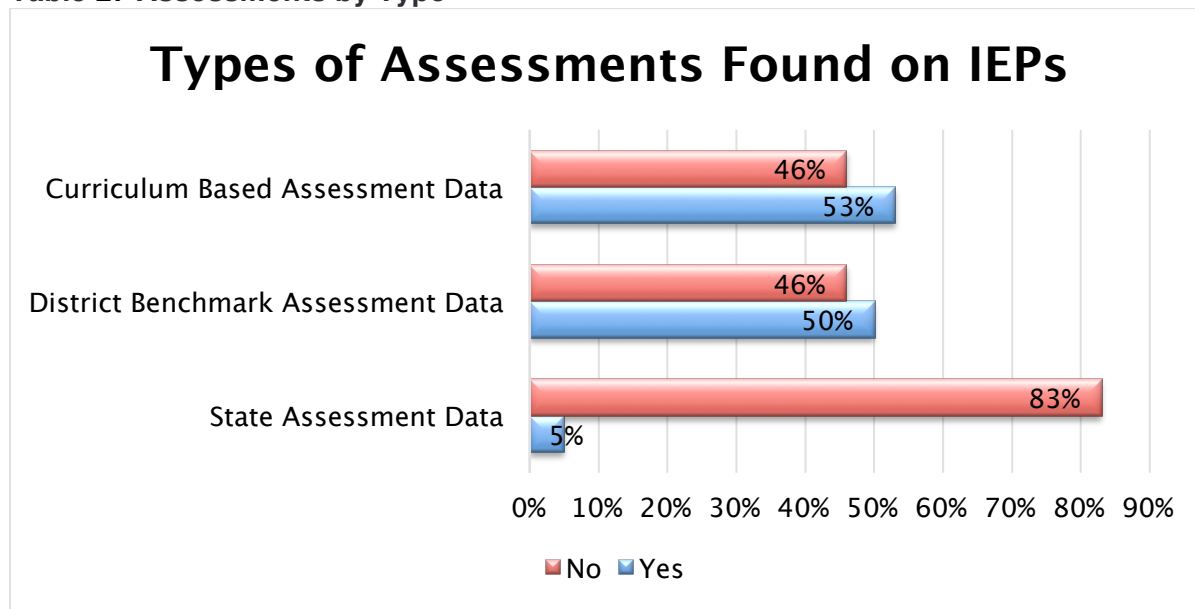


However, also in the area of development of an IEP based on assessment data, IEP Review Protocol question #6 asks:

Does the IEP Contain the following: State Assessments, District Benchmark Assessments, and Curriculum-Based Assessments?

As Table 27 indicates, the majority of IEPs do not include state assessment data and are based on either district benchmark data or curriculum-based data.

Table 27 Assessments by Type

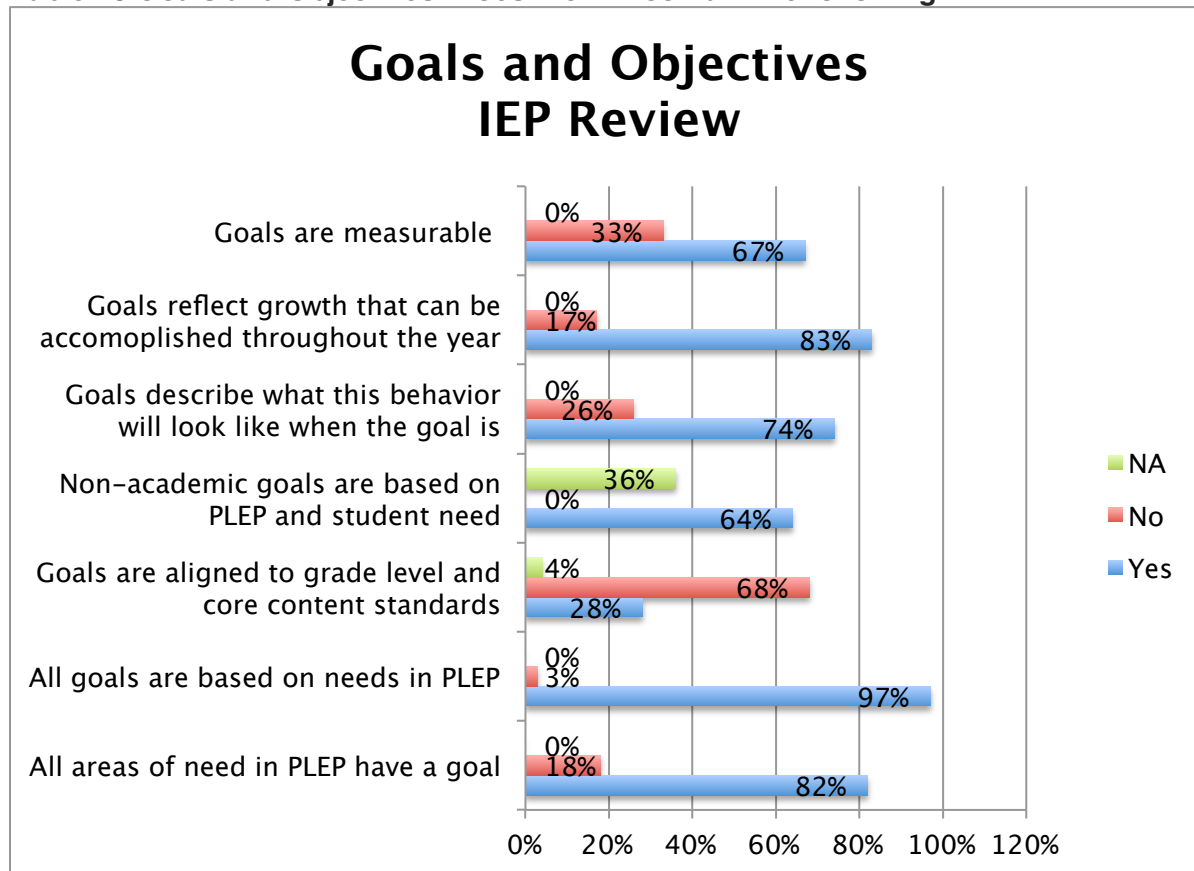


So while the IEPs met the basic floor of compliance in terms of using some form of data to inform IEP development, i.e., the IEP includes the child's present levels of performance and is based on some form assessment data; very few (5%) of the IEPs reviewed included state assessment data which are based on grade level standards, and only half (50%) were based on district benchmark data which are also presumed to be based on grade level standards. More than half (53%) were

based on curriculum-based assessments which are useful for establishing baseline data for a particular skill, but are not useful in determining what the child needs to know and be able to do to attain grade level standards-based competencies.

Therefore, it was not surprising that 68% of the IEPs reviewed did not contain grade level standards-based annual goals, as Table 28 indicates:

Table 28 Goals and Objectives: Does the IEP contain the following?



The presence or absence of grade level standards-based assessments and annual IEP goals are important considerations when examining the achievement gap for students with disabilities. If students with disabilities are not assessed and taught grade level standards, the achievement gap will not close but continue to widen as the child moves through the grade levels. In fact, in addition to being an achievement gap consideration, it is now a compliance consideration as the quote from the recent "significant guidance document" from the U.S. Department of Education, Office of Special Education Programs summarizes:

In sum, consistent with the interpretation of "general education curriculum (i.e., the same curriculum as for nondisabled children)" based on the State's academic content standards for the grade in which a child is enrolled set forth in this letter, an IEP Team must ensure that annual IEP goals are aligned with the State academic content standards for the grade in which a child is enrolled (Dear Colleague Letter, November 16, 2015, U.S. Department of Education, Office of Special Education Programs. Full text included in Appendix C).

Others areas of note included: parent's concerns being reflected in the IEP (79%), measurable objectives (67%) and progress reports (71%) however, only 60% of the progress reports reflected evidence of progress.

Areas of considerable concern for meeting basic IEP compliance were the:

- Lack of Extended School Year (ESY) services in the IEPs reviewed where only 3% included the service, and
- Lack of Transition language for students age 16 and above where Transition plans lacked specificity in describing transition services and courses of study.

Comments from district and school administrators affirmed the IEP Review findings:

- *The connection between IEPs and instruction is not being communicated. There is no understanding in the field about writing a good IEP or the development of goals.*

Comments from teachers and service providers were more related to difficulty with the electronic IEP platform:

- *Not enough people to handle the “help desk” for Enrich (Online IEP platform).*
- *Waiting for LONG time to get an answer.*
- *Enrich is not an “intuitive” system.*

3. Recommendation on IEP Development:

- Provide professional development on writing compliant IEPs in general and in writing standards-based IEP goals in particular.
- Provide specific IEP training for new staff and assign experienced mentor for each new certificated special education staff member.
- Provide IEP development review annually.
- Assign district level special education administrator(s) to randomly check IEPs for compliance and relevancy.

Policy and Procedures

To determine the extent the district’s Special Education policy and procedures contribute to “efficiently meeting needs of students’ Individualized Education Plans (IEP)” WestEd conducted a review of the Jeffco Special Education Practitioner’s Manual available to district staff at:

<https://sites.google.com/a/jeffcoschools.us/special-education/manual>. The stated purpose of the Manual is:

This manual will assist you with understanding Special Education Law and Policy in the state of Colorado. Following most sections you will find a guidance section which is further interpretation of the law to help deepen your understanding. As challenges arise in your school building we recommend you refer to this manual to help guide you teams thinking. If you have any questions about this manual, please contact your district point of contact to continue the conversation.

The Manual is a compilation of pertinent sections of federal and state law as well as implementation guidance from: the Federal Regulations pertaining to the Individuals with Disabilities Education Act (IDEA), the Colorado State Board of Education Rules for the Administration of the Exceptional Children’s Act (ECEA Rules), and the Colorado Association of School Board (CASB) Legal Services Program (LSP). The Manual is divided into topic sections and each section contains both the “Law” as well as “Guidance” to help the user understand the legal requirement. Pertinent sections of the Manual will be referred to again under other sections of this review.

Topics addressed in the Manual include: Child Find (including MTSS), Evaluation and Reevaluations, Eligibility Determination and Categories of Eligibility, Free Appropriate Public Education, Individualized Education Programs, Placement in the Least Restrictive Environment, Preschool Services, Transition and Graduation, Confidentiality of Personally Identifiable

Information, Dispute Resolution, Parent Rights and Participation, Discipline and Attendance issues, Private Schools and Out-of-Home Placements, Restraint, Section 504, Promotion and Retention, School Choice and Charter Schools, Select Funding, and two attachments on Multi-Tiered Model of Instruction and Intervention from the Colorado Department of Education, and a Parent Handout on Use of Restraint.

Because the Manual is based on federal and state law, and offers Guidance for each topic, it provides a comprehensive resource for compliance with the requirements of IDEA, and developing and implementing an IEP. However, given the comments from various school staff, the Manual may not be widely known or utilized. For example, in 27 interviews with Principals, and 18 interviews with parents, the lack of guidance on basic compliance and procedure was mentioned:

- *I am unsure of due process procedures*
- *Last year was chaos and we lost two lawsuits*
- *Who do I go to with a question/concern?*
- *Proper procedural safeguards are not followed*

Alongside the Manual is an A-Z SPED Index. The A-Z contains over sixty topics and resources such as: Announcements, three Professional Development calendars, Intensive Para Support Request, Procedural Safeguards, Common Core (Jeffco) and Common Core State Standards, Rtl Resources, and Para Sub Requests to name a few. The A-Z SPED Index of resources, protocols and processes is a sizable repository of information and resources to implement special education in Jeffco, but again, if site staff are unaware of it, it may not serve its purpose.

For example, in support of improving reading achievement for students with disabilities noted above, the A-Z SPED Index, lists READ Plans. The Colorado READ Act (HB12-1238) requires that a READ Plan must be developed for all students in grades K-3 who are determined to have a Significant Reading Deficiency (SRD). The READ Plan is a general education plan that includes tiered instruction/intervention to be provided within a student's general education program. Under the federal Individuals with Disabilities Education Act (IDEA), which is incorporated into Colorado's Exceptional Children's Education Act (ECEA), an Individualized Education Program (IEP) is a statement of the student's special education and related services [34 CFR 300.320; ECEA Rule 4.03]... and nothing in the READ Act makes students with disabilities exempt from or otherwise not entitled to the benefits of the READ Act.

4. Recommendations on Policies and Procedures:

- To ensure compliance with state and federal laws and regulations for implementing special education, provide professional development to site administrators, special education staff, and any staff who serve students with disabilities on the use of the Special Education Practitioner's Manual.
- To assist with understanding special education policy and procedures and use of the Special Education Practitioner's Manual, a current link to the "point of contact" for each school would assist users in readily identifying who to ask for specific questions.

Administrative Infrastructure and Efficiencies

A comprehensive set of interviews was conducted with virtually all the district's operational and support departments. Each department shared a desire to serve and support special education in a more proactive way. Many shared concerns related to needing to understand the "roadmap" for the year, what might be coming down the pike in special education. They also shared that they are able to help the district save time and money by getting involved earlier in issues. There are a number of systems issues that require attention to help improve the effectiveness and efficiencies of special education within the district.

Staff expressed concerns during interviews and focus groups about the processes that are in place to ensure the administrative support is in place for all special education staff. Special education relies on a library check out system for assessment tools, and requirement for some to Quail Center to enter scoring data into computerized protocols for certain tests. This is frustrating for staff and an inefficient use of their time. Special education teachers also expressed concern with the notification systems and indicated that the system may not be in place to assure that new hires get on distribution lists, such as for the special ed newsletter, memos and other communications.

The support staff within the Ed Center report concerns about workload, lack of cross-training, and not often having the information or administrative support they need to do their work efficiently and effectively. The two people who manage out of district placements are operating with an old File maker pro database to track Placed Out of District (POOD) students, contracts and expenditures that is not connected to the other systems. Only one person has access to this database. Since these students are not kept in Enrich there is also a labor-intensive process to complete the required reporting of special education indicator data to the CO Department of Education. Data quality could be compromised.

The student data manager reported that there have been lots of improvements over the years in collection and reporting of special education data. And there is talk of making more and better data available to parents for all data related to their child, so they can understand the support their child is receiving; and for special education teachers for their use in instructional planning. There is a persistent concern about the management of the enrollment data for students in the Jeffco Transition Services. There are concerns that reporting errors having to do with enrollment and graduation are negatively impacting funding and the accuracy of Jeffco's graduation data. Compliance technicians described issues and a missed opportunity to build in efficiencies between systems in the transition to Enrich when that system was implemented.

The purchasing and contracting department shared two main concerns that have cost and service implications. The first is that there is a big challenge in filling gaps in staffing. The purchasing department helps to fill gaps in permanent staffing by securing contracts with related service providers. A substantial amount of funding goes towards these efforts. There are procedures in place to streamline this work as much as possible. Staff reported that while there has been improvement in getting special education administrators to follow the procedures there is still a long way to go to ensure that the system works efficiently.

A concern was also expressed by these support departments that they don't always know who they should be dealing with in the special education department and expressed a need for identification of special education administrators who are responsible for administrative procedures.

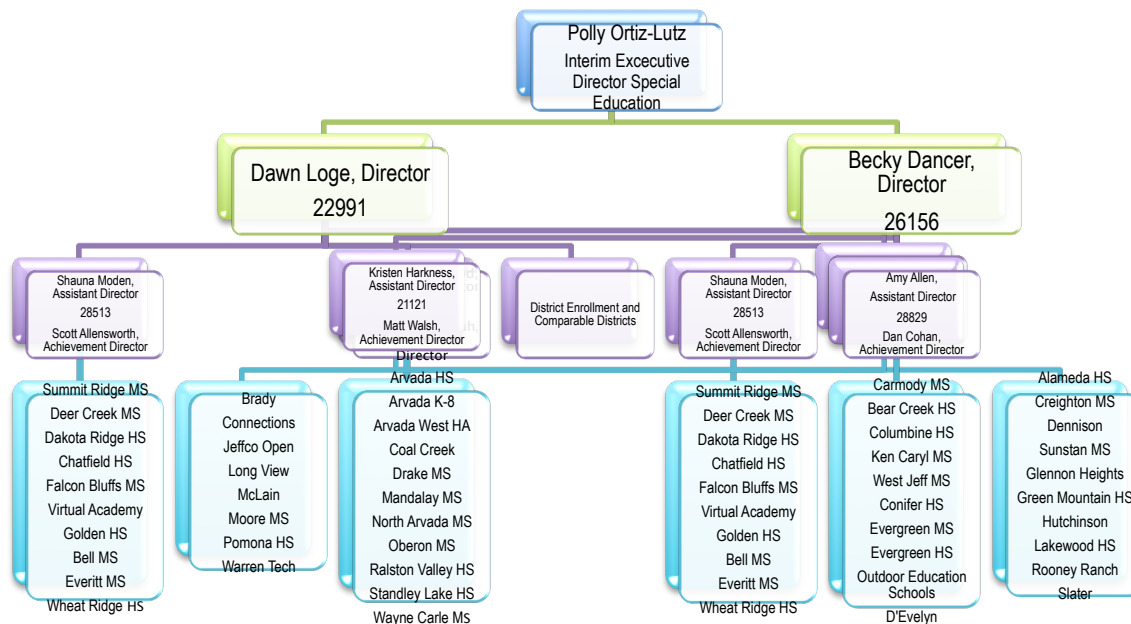
5. Recommendation on administrative infrastructure:

- Special education department administrative team should meet with the operational and support departments to identify some "low hanging fruit" to address soon to gain some efficiencies; and then include these operational and supportive functions in long term strategic planning for improvements in special education.
- Find ways the special education department administrative team can help with efficiencies. Determine productive connections between compliance technicians and personnel at the school level who are responsible for student records.

Management Structure and Job Descriptions

Management structure

The management structure of Jeffco's special education department is illustrated in the following organization chart, listed as Table 29.

Table 29: Secondary Special Education Partnership 2015-2016


The Secondary Special Education Partnership 2015-2016 offers a visual example of the relatively new management structure that is designed to offer greater support to schools and is aligned with the general education management structure that provides groups of 8-10 schools or programs a general education Achievement Director and a special education Assistant Director (“special education partner”). In the Secondary model, two Directors supervise and support the six Achievement Director/Special Education Partner pairs (the document referred to below indicates seven secondary partners). The Executive Director of Special Education supervises the two Directors and is under the office of Educational Research and Design led by the Chief Academic Officer.

An addition document, Achievement Director/SPED Partners, mirrors the Secondary Special Education Partnership 2015-2016 but also includes the management structure for elementary schools. Two Directors supervise and support ten elementary Achievement Director/Assistant Director (“special education partner”) pairs and are supervised by the Chief School Effectiveness Officer and the Executive Director of Special Education, under the office of Educational Research and Design led by the Chief Academic Officer.

In sum, the special education school support management structure includes:

- (1) Executive Director of Special Education
- (4) Directors
- (17) Assistant Directors (“special education partner”)

According to the document, Achievement Director/SPED Partners, additional district office special education administration includes:

- Coordinators for Speech and Language, Charter Schools, Motor Development, Mental Health, School to Work Alliance, and Transition,
- Homebound Instruction and Judicial Liaisons,
- Specialists for: Behavior, Assistive Technology, Student Engagement and Out of District Placements.

Job Descriptions

Summary of management structure and job descriptions: (The complete summary of the special education job descriptions provided is included in Appendix D.)

There is a defined management and support hierarchy in the special education department with written roles and responsibilities in job descriptions for top administrative positions. There is a mechanism in place, although newly developed and implemented, to support site level administrators and schools who serve students with disabilities. However, the current structure is fairly new and comes on the heels of administrative turn over with the inconsistent vision and leadership that turn over creates.

To determine the perceived effectiveness of this management structure by schools and other stakeholders, WestEd conducted interviews and focus groups and asked the question: *Does the district provide sufficient leadership and support for site administrators and teachers?*

Interviews and focus groups were overwhelming in agreement that there was inconsistent information and technical assistance from the district office due to on going changes within the district office administration. For example:

100% of the nineteen interviews with district office staff, twenty-two interviews with Principals, and twenty-five interviews with teachers indicated a need for transparent leadership with clear communication of policies and procedures:

- *Ongoing organizational changes within special education leadership have impacted relationships.*
- *I feel there is a credibility issue since the many personnel changes and there is not clear vision from special education.*
- *There is a sense of mistrust from the schools and a question of credibility regarding the special education staff.*
- *There is a lack of clarity on roles and responsibilities for all personnel (administrators, teachers, district special education administrators).*
- *Feels like there is no direction. Over the last 4 years there have been massive shifts.*
- *Every year I think I can't be more frustrated with SE but every year it's worse than the last.*

In a summary of twenty focus groups, eleven noted issues related to organizational structure:

- *Changes are too constant in special education structures and decision-making and a cohesive system in administration support and staff is lacking.*

64% of responses to the focus group question, *Does district administration provide sufficient leadership and support...?* Answered, No.

Some staff recognized the progress of the new management structure and acknowledged improvement:

- *We love our new special education contact this year. She is responsive to our emails and wants to work with us. Last year, I think we saw our special education contact like twice so it is difficult to build any real team and felt like us versus them.*
- *Area Rep for SE has been great – immediate, timely and accurate; last year was chaos and we lost two lawsuits.*
- *I feel that for the first time in years we are able to get quick responses from our area coordinator and that she has knowledgeable of who to contact if she cannot answer our question.*

The online Staff Survey with 2,200 respondents yielded more mixed results when asked to rate following statement from strongly agree to strongly disagree:

District administration is structured to provide an appropriate level of leadership to school sites to support the needs of students receiving special education services.

- 831 General Education Teachers: 35.86% disagreed or strongly disagreed and 29.12% agreed or strongly agreed
- 334 Special Education Teachers: 51.2% disagreed or strongly disagreed and 45.52% agreed or strongly agreed
- 310 Other Teacher: 34.84% disagreed or strongly disagreed and 37.74% agreed or strongly agreed
- 117 Principals: 44.5 % disagreed or strongly disagreed and 54.7% agreed or strongly agreed.
- 78 Vice-Principals: 36.84% disagreed or strongly disagreed and 57.9% agreed or strongly agreed.

In general, 56% of administrators feel the management structure provides an appropriate level of leadership to sites, where only 37% of all teacher respondents feel the management structure offers an appropriate level of leadership. General education teachers were the least likely of the three teacher groups to think that the management structure is appropriate, while special education teachers were more likely to agree that the management structure is appropriate. This may be due to site administrators receiving information about district office changes before teachers and information about the new structure not scaling down yet. It may also be that teachers simply do not feel as supported as administrators, which was reflected in responses about the need for more support to accommodate the needs of students with disabilities in general education classrooms.

6. Recommendations on Management Structure:

- Continue to implement the new management and support structure by:
 - Providing communication to all staff about the support structure and,
 - Creating a quality control system for the new structure to ensure quality, equity and consistency.
- Continue to collaborate with general education to align and improve communication and common key messages.

Culture, climate and communication

To analyze the impact that the special education management structure has on the district's communication, culture and climate, WestEd conducted interviews and focus groups and survey questions that asked, *What challenges exist?*

Twenty-two interviews with Principals indicated:

- *Could be doing better at communication*
- *Who's calling the shots? Who do I go to with a question/concern?*
- *I get different messages from different folks.*

Thirty-two interviews with Principals indicated the need for:

- *A clear process or assigning site support*

Twenty-five interviews with teachers indicated:

- *Need guidance from the District regarding legal and policy issues and consistent and knowledgeable information from District.*
- *There are problems with communication... next year the CDE will not issue credits the way they have in the past for students with special needs... there has been no direction or communication from the district office to schools. This will impact how we provide services*

A focus group with twenty-six parents indicated:

- *Inconsistent communication between district office and parents.*

In the online Staff Survey where 127 Principals responded to the question, *In your opinion, what challenges exist for students receiving special education services in Jeffco? Provide one specific challenge*, several noted communication:

- *A system-wide or organizational approach/culture that has everyone well informed and on the same page in regard to staffing, budget, resources and programming.*
- *Clear direction that is grounded in shared commitments.*
- *Situations become very confusing once it has gone to the district or circumvented school based administration.*
- *Communication from SPED department can be sporadic, leaving school based personnel unsure of next steps to resolve situations.*
- *Lack of communication/support from the District.*

Similarly, on the online Staff Survey, when asked, *In your opinion, how could the district improve its special education services? Provide one specific recommendation*, 77 respondents noted communication:

- *Communicate; defined systems of support to school sites, individual teachers, and families; communicate and communicate!*
- *COMMUNICATION. Help principals understand what services should look like, train SPED teachers best practices, and communicate changes as they come down the pike.*
- *I would say the biggest thing the district could improve is communication between teachers and administration in the special education department.*
- *One significant issue is the amount of effective communication we receive from district support staff. Often we do not hear back or the message is different from previous messages.*
- *Across the board there is a lack of follow-through and communication between the district SPED department and the individual schools.*
- *Those at the administrative level should reach out bi-weekly to those on the front lines with communication: suggestions, who does what, resources, training, etc. Also, include all school administrators, paras and assistants (not only special ed) on the mailings.*
- *Clearer communication and common voice among leadership.*
- *Increased communication about changes in policies and procedures would be helpful along with PD around the changes and expected timelines for implementation.*
- *Increase communication so general education teachers know best practices to help special education students AND how to support special education teachers.*

In contrast, when asked *What's working?* on the online survey, thirty-nine respondents noted that communication between general and special education teachers at the site level is working:

- *Communication between disciplines (sped, general ed, itinerants, school admin) is improving at my schools. I see more consistency in student's academic processes and outcomes.*
- *School primary providers work to communicate with general education teachers about student needs.*
- *Communication between special education teachers and other staff.*
- *Communication between caseload managing teachers and general education teachers is strong.*
- *Students that are working with a gen Ed and special Ed teachers [who] communicate and plan together.*
- *Our team has great communication and high expectations.*
- *Communication between special ed teachers and general ed teachers during IEP meetings and what is expected from both ends and how to make the student accountable for their academics/participation.*

7. Recommendations for Improved Climate, Culture, and Communication:

- As part of the design of an aligned system of support, create feedback loops where levels of the system (district, site, class, stakeholders) are included and informed. Define when, where, and how ongoing communication will occur. The development of a comprehensive system of support should include alignment to Jeffco 2020 and key initiatives.
 - Communication system should create an online, email, telephone and face-to-face communication system to ensure all stakeholders from parents to teachers and site administrators have timely, accurate, consistent information and support.
 - Materials should be created to be shared with parents on the district's website, as well as in meetings to help parents understand special education, who to call for what, and how to navigate the system including different types of transitions between settings.

Task 3: Analyze the current organization's ability to analyze and mitigate risk or legal liabilities and provide recommendations for improvements.

WestEd worked closely with Jeffco Public Schools staff from the Special Education Department and Business Office to develop the process and format of the review, which included:

- Reviewing district compliance, complaints and due process and comparing with similar districts.
- Reviewing sufficiency of service for students in least restrictive environments.
- Reviewing the district's continuum of special education service delivery options to promote improved student outcomes through a resource appropriate and cost effective service delivery.
- Reviewing the process for determining if a student qualifies for Special Education services to best determine over/under identification and review identification rates by disabilities.
- Analyzing the organization's financial and budgetary model for consistency with special education priorities and legal compliance.

The following findings were collected through qualitative data including program descriptions, interviews, focus groups, surveys and classroom observations and, quantitative data including a review of complaints and mediated agreements, budget analysis and resource allocation, as well as qualitative data including interviews, focus groups, surveys and classroom observations.

Jeffco compliance, complaints and due process litigation

The Colorado Department of Education, as part of its general supervision responsibilities for ensuring local education agencies (districts) comply with the requirements of the Individuals with Disabilities Education Act, annually collect data from districts in areas of over all compliance, review the data, and if non compliance is found, issue notifications of non compliance and requirements for correction action. After three years of corrective actions, CDE recently issued Jeffco a finding of compliance with corrective actions, and the district is commended for achieving this status.

Additionally, states are required to offer two mechanisms where families and other stakeholders can seek state help in addressing complaints and concerns about compliance and about the evaluation and implementation of IEPs. Jeffco had two special education state complaints filed in 2015. The State Compliance Officer concluded Jeffco violated the following IDEA requirements:

- a. Failure to hold an IEP team meeting when determining the educational placement of a child with a disability, consistent with 34 C.F.R. § 300.116; and

- b. Failure to provide parents with prior written notice a reasonable time before implementing a change in education placement, consistent with 34 C.F.R. § 300.503(a).

The State Compliance Officer concluded Jeffco did not violate any IDEA requirements as alleged by Parents in the second complaint filed in 2015.

Compliance, complaints and due process litigation compared with similar districts

To determine how Jeffco compares with similar districts in complaints and due process filings, WestEd completed the following comparative analysis illustrated in Table 30.

Table 30: Comparison of state complaints and due process filings with similar districts

Overview	State Result	Jefferson County	Aurora	Cherry Creek	Boulder	Denver Public Schools	Douglas
2015 Due Process	3	0	0	0	0	1	0
2015 State Complaint	9	2	0	0	0	0	0
2014 Due Process	4	0	1	0	0	0	0
2014 State Complaints	12	0	1	0	0	0	0
2013 Due Process	3	0	0	0	1	0	0
2013 State Complaint	9	0	0	0	2	0	0
2012 Due Process	5	0	0	1	1	0	1
2012 State Complaint	10	1	0	2	0	0	1
Total	55	3	2	1	4	1	2

Source: Colorado Department of Education website <http://www.cde.state.co.us/spedlaw/decisions>

During the past four years, the Colorado Department of Education received fifty-five special education state complaints and due process decisions. Jefferson County School District had two special education state complaints and one due process filed with the Colorado State Department. In comparison to similar school districts, four districts had two or less complaints/due process hearings and one district had more than three.

Analysis of district's continuum of special education service delivery options to promote service in the least restrictive environment and improved student outcomes through resource appropriate and cost effective service delivery.

Special Education Program Descriptions

WestEd reviewed documents (Special Education Services dated 11/20/2015) and the district website to identify special education program descriptions. Beginning from birth and continuing to age 21, Jeffco offers a variety of services and programs as summarized below:

Child Find (Birth to 5) provides free developmental assessments for young children from birth to 5 years of age for whom there may be concerns. Child Find can help families determine if their child is eligible for special education services in the areas of learning, speech, language, motor skills, and social/emotional needs. The Child Find program is a free resource for families who live in Jefferson County.

Preschool programming is provided to meet the needs of children ages 3 through 5. Children identified with special needs can receive special education and related services at 34 district preschool sites in an integrated service delivery model. For children who need more intensive services in a smaller classroom setting, there are a number of classrooms available across the district. Children who require multiple supports, including medical needs, may receive services in preschool classrooms at Miller Special School.

Learning Disabled Grades K-12 programming located in each school assists the student in developing skills and learning behaviors, which enable him/her to benefit from the general education program. Special education services are provided in a variety of ways: direct instruction, co-teaching, consultation, and materials modification as identified on the student's IEP.

Significant Support Needs K-12 programs offer special education and related services for students with severe developmental delays in multiple areas, such as cognitive, speech/language, motor delays. Instruction focuses on the individual educational needs of the student guided by Expanded Benchmarks and Access skills as a foundation to the students' IEP goals and objectives. These programs are geographically located within neighborhood schools throughout the district.

Significant Emotional Disorders programming is for students who may have a significant identifiable emotional disorder that affects their ability to function within a general school environment or access the general curriculum and whose academic achievement is hindered by pervasive behavioral or emotional problems. Social/emotional services are offered in a continuum of environments ranging from full access to the general education classroom to a self-contained class; placement is based upon individual student need as determined by the student's IEP.

Autism programs are designed to meet the educational needs of children with autism provide a structured teaching approach to learning. As with any student qualifying for special education services, the IEP will direct the program. Special attention is paid to skills in the following domains: communication, social, academic, daily living, independence, sensory motor, and vocational. Services to students with autism are offered in a continuum of environments ranging from full access to the general education classroom to a self-contained class; placement is based upon individual student need. Intensive early intervention is a priority.

Deaf/Hard of Hearing programs serves students Preschool through 12th grade with hearing loss and whose needs require intensive services by teachers of the deaf/hard of hearing, audiologists, speech/language therapists and mental health staff. Educational interpreters and tutor-notetakers are available to support student learning. Services are provided at neighborhood schools and at center programs. Additionally, the district supports a charter school, the **Rocky Mountain Deaf School**, which serves preschool through eighth grade students and offers a publicly funded bilingual education that promotes academic excellence, full proficiency in American Sign Language and English literacy.

Fletcher Miller School provides interactive and interdisciplinary approaches to academics while meeting individual needs in the areas of medical, physical, social/emotional, and communication supports in order to successfully transition each student in special education to his/her least restrictive environment. Additionally, the **Lighthouse Program**, located at Fletcher Miller School, is designed for secondary severe developmentally delayed students with significant behavioral problems.

Sobesky Academy is an alternative to out-of-district placement, and is designed to meet the

intensive emotional, behavioral, and related academic needs of students with identified emotional disabilities.

Transition Services is an optional program for young adults with special needs who are 18-21 years of age and who have completed their high school education and provides learning experiences, which are designed to assist youth in transitioning from high school student to adult.

Placement of students with disabilities

Some of the program descriptions above may not reflect the placement of a student in a general or special education environment but rather describes services and programs designed to meet individual student needs. For example, all schools have at least one Learning Specialist who provides the services described above as Learning Disabled Grades K-12 where students with disabilities spend the majority of the instructional day in general education classrooms and special education service may be direct instruction, co-teaching or collaboration and consultation with the general education teacher.

On the other hand, Jeffco refers to special classes located in public schools as Center or Center-Based Programs where students spend greater amounts of time in special education classes. According to the document the Special Education Department provided, Educational Research and Design: Center Based Programs 2015-2016 dated July 8, 2015, the district operates seven types of special classes or Center programs: Autism Spectrum Disorder, Significant Support Needs 2, Significant Support Needs 3, Deaf/Hard of Hearing, Gifted and Talented and Preschool. And, classroom observations and interviews indicated there are also special or Center classes for students with Significant Emotional Disorders.

And, as described under Program Descriptions, Jeffco operates three special schools where students with disabilities are placed for the entire instructional day: Rocky Mountain Deaf School, the Fletcher Miller School and Lighthouse Program and, the Sobesky Academy.

Placement comparison with similar districts

As the Jeffco Special Education Practitioner's Manual and state and federal law dictate, placement is described as placement in the least restrictive environment (LRE) and districts and schools must provide a continuum of placements to meet the individual needs of students with disabilities such as:

- States and school districts must provide a continuum of alternative placements to meet the needs of disabled students, including instruction in regular classes, special classes, special schools, home instruction, and instruction in hospitals and institutions.
- Supplementary services (such as resource room or itinerant instruction) must be provided, as appropriate, in conjunction with placement in a regular class (PRACTICAL GUIDELINES AND ANALYSIS: Placement and Least Restrictive Environment (LRE) (2014). Special Education Practitioner's Manual)

To examine where students with disabilities actually spend the instructional day or are placed, districts are required by state and federal law to submit reports of LRE placement. As the chart below indicates, placement in the general education classes 80% of time or more category (5A), compared with similar districts, Jeffco students with disabilities spend a greater amount of the instructional day in special education settings.

Table 31: School Age Placement Data for Jeffco and Comparison Districts 2013-14 Data

SWD Indicators 2013-14 Data	State Target	State Result	Jeffco	Aurora	Boulder	Cherry Creek	Denver	Douglas Co.
5A. School Age Placements	≥71.30%	72.11%	70.05%	74.07%	81.22%	67.60%	73.27%	75.45%
5B. School Age Placements	<7.30%	7.19%	8.60%	13.83%	2.76%	8.62%	10.67%	4.44%
5C. School Age Placements	<3.50%	2.63%	5.48%	2.83%	1.36%	4.48%	1.90%	2.37%

Source: Colorado Department of Education website
<https://www.cde.state.co.us/cdesped/AUperformanceprofiles>

5A is the percentage of students with IEPs served inside the regular class 80% or more of the day divided by the total number of students aged 6 through 21 with IEPs, times 100. 5B is the percentage of students with IEPs served inside the regular class less than 40% of the day divided by the total number of students aged 6 through 21 with IEPs, times 100. 5C is the percentage is the number of children with IEPs served in separate schools, residential facilities, or homebound/hospital placements divided by the total number of students aged 6 through 21 with IEPs, times 100.

In the 5A category, regardless of program description or design, Jeffco students with disabilities spent less time in general education settings than four out of five similar districts. In fact, Jeffco did not meet the state target of 71.30% of students with disabilities spending 80% or more of the instructional day in general education classrooms. Boulder, Douglas, Aurora and Denver students with disabilities spend more time in general education classrooms. In the 5B category, where students with disabilities spend less than 40% of the day in general education classes, Jeffco exceeded the state target but was in the mid range when compared with similar districts. In the 5C category where students with disabilities are placed in separate schools, Jeffco exceeded the state target and was the highest among the comparison districts.

In the last Jeffco report to CDE of high cost students, there were 47 Jeffco students who are placed out of district who cost more than \$47,000 annually. Participants reported that due to some efforts last year to use the new behavior specialists to help develop positive behavioral support plans, there was a reduction of students placed out of district last year, but since Oct 1, there's been an uptick in referrals for out of district placement.

The LRE findings have implications for negative compliance ramifications and negatively impact student outcomes. Numerous studies have found that students with disabilities who spend the majority of the school day in general education classes and have meaningful access to grade level standards-based instruction perform better on standardized assessments and have improved graduation and post school outcomes (Source 34 C.F.R. § 300.114 (2014)).

While the data indicates that Jeffco has more restrictive placements for students with disabilities compared to the state target and comparable districts, staff feels that a greater continuum of placements, including more special classes is needed. For example, online survey comments from staff stated:

- *There is a lack of Continuum as students move into Middle and High School*
- *I think that the continuum of services, especially at the secondary level, is challenging or non-existent as students move to their home schools. Students have their needs met much more effectively in some schools than others.*
- *We have no continuum of support - By law I can't modify for a student with major cognitive issues that are several years below grade level, but there are not the resources (materials*

or people) to allow me to accommodate adequately for these students in a class of 32. We are doing these children a disservice!

- *At the secondary level, there is often a lack of a continuum of services for students who had previously been receiving self-contained support. This presents a very difficult transition to middle school and beyond.*
- *We have faced challenges this year with students who have been inappropriately placed. It has been VERY difficult on the student, parents, sped teachers, gen ed teachers, other students, and a tremendous drain on school resources... Along that same line, it would make sense to have some continuum of support levels and services within an articulation area.*

Online survey responses from parents indicated that 85% felt their child was educated with nondisabled children the appropriate amount of time and 80% were satisfied with the amount of time their child was educated in general education environments. However, comments from parents included both a desire to have more inclusive opportunities (18%) and have options for more center-based programs for middle and high school students (20%). Some of the comments include:

- *While the "center based" program may seem good on paper, I'm not sure that it serves our children well. It's often requiring long commutes, going to school with classmates so far away that it inhibits natural relationships from forming, access to GenEd curriculum appears to take a hit, kids in the SPED program are being lumped together.*
- *Mirror the elementary ASD program in middle schools. Continue to help these kids cope with the drastic change of having support to minimal. Set up ASD programs in select middle school articulation areas. Kids need continued intense behavioral support. They should have same opportunities as all kids to graduate.*
- *Provide more intensive support in early grades instead of waiting Pre-K -3 Provide more integrated classes for Special needs and typical children. In this day and age, I feel if kids grow up with others not like them it will help look at others as equals and not different.*
- *Created ASD program at the middle school level and not expect the neighborhood school to provide the services.*

Given the findings about Jeffco's restrictive placement status, the district is commended for moving to a less restrictive placement model at the secondary level; however, stakeholder perception is a lack of stakeholder-involved planning, training, communication and provision of resources; therefore, it is recommended that the overall vision of improved access to inclusive environments for all students needs to be revisited as part of the development systemic system of supports.

8. Recommendations for improving access to inclusive opportunities:

- Convene a stakeholder group be to analyze placement options, data, and make recommendations about a full continuum of placement options for grades preschool through grade 12 and,
- Provide professional development and coaching support on inclusive practices so the transition to less restrictive practices can be more successful.
- Provide a clear picture of the current continuum of services so that parents and staff can understand placement options, especially around the transition from pre-K to K, elementary to middle, and middle to high, and from settings that are less restrictive to more, and more restrictive to less.
- Provide clear communication on an ongoing basis to staff about the vision for improving access to inclusive opportunities, what this looks like, and the supports that are available to make this happen.

Process for determining if a student qualifies for Special Education Services

The Jeffco Special Education Practitioner's Manual available to district staff at: <https://sites.google.com/a/jeffcoschools.us/special-education/manual>, includes a section under Child Find that explains the requirement and process for determining if child has a suspected disability and includes providing Multi-Tiered System of Supports (MTSS). Excerpts from the Guidance document are highlighted below.

- *MTSS is a coordinated effort designed to improve educational outcomes for all students through continuous progress monitoring and early intervention with evidenced-based instructional strategies. MTSS is an integrated system that connects general, compensatory, gifted, and special education in providing high quality, standards-based instruction that is matched to students' academic, social-emotional, and behavioral needs.*
- *The MTSS framework consists of hierarchical tiers of instruction and supports available to every student within the school with the expectation that intensity increases until the student's learning needs are met.*
- *Throughout the process, teams make decisions about school-wide and individual student needs based on frequent monitoring of progress data. The teams collect data, including diagnostic academic assessments as appropriate. Academic and behavioral supports are designed to assist children who may be struggling but who are not suspected of having a disability. A documented process is now required as part of the criteria to determine eligibility under IDEA for students with specific learning disabilities and significant identifiable emotional disabilities.*

In general, the interview, focus group and survey findings suggest that the pre referral process for special education varies greatly by site and that there is no common Response to Intervention (RtI) or Multi-Tiered Systems of Support (MTSS) model in place:

- *District has not defined MTSS subsequently schools have varied understanding of RTI.*
- *There is no fidelity of implementation. Is anyone in charge of MTSS?*
- *MTSS is very driven by building. It's an expectation, but very local decision so there is a wide range of practices.*
- *We are not clear on how the MTSS process works with Special Ed*
- *Jeffco needs to continue to refine its RtI process so that this is solidly in place before students are referred for SpEd, to progress monitor students who are in SpEd and to terminate IEP, when appropriate.*
- *The length of time it takes a general ed teacher to move an RTI student through the MTSS process is too long. 12 weeks to respond to a student who is struggling in school by gathering data and documenting and then gathering more followed by documenting more in some cases is too long!*

However, a few survey respondents noted RtI and MTSS as a strength at their school:

- *MTSS provides opportunity to work collectively to intervene for students both behaviorally and academically. System in place requires intervention prior to identification.*
- *I feel that the special education staff at my schools have learned to use RTI to serve the students and families needing interventions in school.*
- *At our school the RtI process is used with fidelity prior to escalate a student need toward identification of a learning disability; however, I'm not sure this same level of proficiency is systemic throughout the district.*

9. Recommendation on developing a district-wide system of supports:

- Given the range of responses about the common understanding and use of MTSS, provide professional development about MTSS as described in the Jeffco Special Education Practitioner's Manual and the Colorado Department of Education website @ <https://www.cde.state.co.us/mtss> as a beginning of development of a common understanding of an aligned system
- Develop structures and processes to create an aligned system of supports.

Analysis of financial and budgetary model

Creating high-quality, effective and efficient special education programs is a concern for virtually every school district. The cost of special education services is driven by several factors, including the number of eligible students, the manner in which services are provided, and the quality and responsiveness of such services to meet students' needs. Additionally, there can be costs that increase on the natural each year for expenditure classifications such as staff compensation or contracted services. Understanding the cost drivers associated with special education is important, but of equal importance is attention to the quality of the program when considering program costs.

The District's support for the Special Education Program is estimated to be more than \$88.6 million in 2015-16. The overall cost to support the Special Education Program is estimated to increase by 2.8 percent or about \$2.4 million more between 2012-13 and 2015-16. The financial data for 2015-16 is based on the District's working budget load. A review of the District's budget to actual fiscal data reflects that the District uses a conservative approach to budgeting, for its federal funds (grant fund). Therefore, actual expenditure amounts for 2015-16 will likely be less than the amounts reflected in Table 32 below.

As noted in the paragraph above, changes in the amount of eligible students can drive program costs. The district's total enrollment (see Table 32) has experienced slight growth over time and it is not unexpected that the number of students with disabilities also reflects a slight increase over the same time period. While in most years during the time period examined, the enrollment trend for students with disabilities was fairly stable the rate of increase noted for 2014-15 far exceeds the rate of increase for the total enrollment. Data was not available at the time the report analysis was conducted to substantiate whether this is a trend reversal or one-year anomaly in the otherwise reassuring trend of fairly flat rates of enrollment for students with disabilities. However, if students receiving special education services continue to grow both in numbers and proportionality this could contribute increased program costs.

Table 32: Program expense by account classification for the special education general, grant and campus fund 2012- 2013 through 2015-2016

Account Classification	2012-13 Actuals	% of Expense	2013-14 Actuals	% of Expense	2014-15 Actuals	% of Expense	2015-16 Budget Load	% of Expense
Salary	\$59,796,537	69.31%	\$60,339,865	68.79%	\$58,922,187	69.27%	\$61,665,355	69.52%
Benefits	\$16,746,781	19.41%	\$17,244,673	19.66%	\$17,169,597	20.18%	\$18,115,251	20.42%
Purchased Services	\$7,832,987	9.08%	\$8,344,367	9.51%	\$7,430,654	8.74%	\$7,461,976	8.41%
Supplies	\$1,013,354	1.17%	\$961,951	1.10%	\$846,506	1.00%	\$544,693	0.61%
Property	\$160,710	0.19%	\$66,088	0.08%	\$	0.00%	\$9,500	0.01%
Other Objects-indirect costs	\$728,255	0.84%	\$764,963	0.87%	\$692,457	0.81%	\$900,000	1.01%
Total	\$86,278,624	100.00%	\$87,721,907	100.00%	\$85,061,402	100.00%	\$88,696,775	100.00%

Source: District provided data 2013-14 -2015-16. Note actual expenditure amount are used for 2012-13 through 2014-15

As is the case with most programs operated within a school district, compensation for staff (salary and benefits) accounts for the vast majority of expenses. Nearly 90% of the estimated program expense for 2015-16 is related to staff compensation (i.e., salary and benefits). When considering the cost of staff compensation, it is important to note that there are costs that can increase on the natural each year for staff compensation, e.g., annual increases for salary costs due to step/column and increases or increases to the cost of statutory benefits. Therefore, it is not unexpected to see staff compensation expenditures levels increase over time. When comparing year over year changes in the cost of staff compensation there was a decrease of 2.35% in 2014-15 followed by an estimated increase in salary compensation of more than 4.6 percent in 2015-16. A review of salary expenditures reflects that the 2014-15 expense for administration and classified increased over the prior year by approximately \$395,000 and \$214,000 respectively. Decreases in the salary expense for certificated (non-administrative and designated instructional services) and paraprofessionals of approximately \$1,361,000 and \$409,000 respectively.

A review of budgeted salary expenditures for 2015-16 reflects that the majority of the budget increase is for certificated (non-administrative and designated instructional services) and paraprofessional salaries; 46% and 44% respectively which is a reversal of the decrease noted in 2014-15. Additionally, nearly 50% of the increased budget costs for staff compensation are in the grant fund and it is important to note that the grant fund expenditures historically do not come to fruition as budgeted.

The expenditures for purchased services accounts for the next largest expense, with 8.41% of the budgeted program expense in 2015-16. There is a notable change in this expense area, with a near 11 percent decrease in expenditures when comparing 2012-13 to 2014-15. Our review notes that expenditures for out of district pupil placements has experienced significant changes that include a 27% decrease in costs in 2014-15 and an estimated 39% cost or nearly a \$1.4 million increase in 2015-16. The cost for contracted services for related services such as, speech and language, psychologist and occupational therapy increased by more than 47% or \$515,663 in 2014-15 but this was offset in part by a reduction in salary costs for these services as noted above. Conversely, in 2015-16 the cost for contracted services for related service is estimated to be significantly reduced by nearly \$ 800,000 but this savings is offset in part by increased certificated salaries also noted above.

Supplies and property are areas within a program that can experience expenditure variances from year to year based on the need for periodic purchases such as textbooks or one time purchases or items such as equipment for low incidence disabilities. Hence, it is not unusual to see that the 2015-16 expenditure level for materials and supplies and property decreased when compared to 2014-15.

10. Recommendation for fiscal

- Given that nearly 90 percent of the district's special education program expense is for staff compensation the district should continue to utilize the Guiding Principles for Allocations of Sped Staff to optimize staff levels.
- Review allocations of Health, School Psychologist and Occupational Therapist positions for reasonableness.

Recommendations

The data in this review indicate a need to approach special education supports and services as a more systemic part of the district and not a separate department which operates independently. Students receiving special education services are first and foremost general education students who require additional supports to assist them in achieving to high expectations. Since the majority of students receiving special education services spend at least a portion of their school day in general education classes, it is imperative that these instructional environments are able to provide the necessary supports for all students to be successful.

It is important to note that during the period in which this review has been operationalized (beginning April 2015), structural changes to the operations and management of the special education department were already underway. From senior level leaders, commitment is acknowledged, and changes in administrative position locations, staff assignments, and other indicators of change are embraced and appreciated by personnel at the most senior levels of leadership. Deep systemic work across all levels of the system is just starting. Communication and awareness is in its' development stage at the senior level and now needs to be deployed at each level of the system. The incentive behind the review of special education was sparked by the desire to make changes to the system of supports and services for students with disabilities basing it on data of how the system was currently functioning and how effective it was in supporting the successful outcomes of students with disabilities.

The data supplied in this review should assist Jeffco in moving forward with improvements to the system that will allow for alignment and collaboration across the district and provide services in a more effective and efficient manner. The recommendations scattered throughout the report are summarized below.

Task 1 Recommendations:

1. Recommendations on staffing allocations:

- The executive cabinet and student services department should take the time to develop a deeper understanding of health services concerns and all other staffing issues presented here in relation to other findings raised in this report, to develop a systemic and long-term process to provide services to students with disabilities in an equitable and efficient manner.
 - Creating a process for ongoing communication and engagement around the issues of staffing allocations so that all stakeholders understand that allocations are more than just numbers of staff but need to be paired with appropriate training, processes for identification of support needs and systems for continuous improvement of the processes. For example, build an understanding that through increased collaboration, or multi-tiered systems of support are implemented, existing special education staff can be more effective.
- Create a transparent process for special education staff allocations which involves stakeholder involvement to create a more positive culture. Develop an ongoing process for communicating staffing processes, service delivery contexts, decisions-making and rationale in a timely manner.
 - Ensure that allocation processes include the appropriate professional development and support for staff to ensure that personnel are appropriately trained and following processes and procedures (health and mental health services).
 - Ensure that ongoing communication about allocations, processes and procedures address the differing needs of schools and that allocations at some schools will differ based on student needs. (See recommendation #2 for more discussion).
 - Develop a decision-making guide for sites for allocation of behavioral/mental health personnel that would include the types of skills that each have, roles and

- types of support provided by each type and a needs assessment to assist sites in deciding what type of position would best support their needs.
- Develop a process to allow more precise tracking of special education personnel expenditures which should include a:
 - Review all special education personnel categories and combine similar positions to reduce the number of categories and align more closely with state and similar district special education personnel categories,
 - Review position descriptions, descriptions of programs and services and develop guidance to sites and staff (including IEP teams) to allow for a better understanding of roles and responsibilities of various positions and types of programs and services across the district.
- Finalize allocations earlier to allow schools to hire in time for the start of the school year to minimize vacant positions

Task 2 Recommendations:

2. Recommendations for improving instructional practices:

- Professional development needs to be offered in a systematic manner that targets the critical learning needs of general and special education teachers so that they can build the skills necessary to support the learning of all students along with the specialized needs of students with disabilities. Ongoing professional development with coaching, optimization of existing offerings, and time for collaborative planning will assist with sustainability and effectiveness and will provide a long-term costs.
 - Providing professional development to general special education staff on the use of Universal Design for Learning (UDL) and other evidence-based methodology would help close the achievement gap by making grade level standards-based instruction accessible to diverse learners.
 - To close the achievement gap in reading between students with and without disabilities provide professional development and resources to fully implement, to both general education and special education teachers, on evidence based strategies, such as the Colorado READ Act (HB12-1238) (and include students with disabilities in the initiative).
- Explore ways to increase the amount of collaborative planning time teachers and other staff has to discuss and plan to meet the needs of all of the students. Optimize the structures that are in place for ongoing learning, such as professional learning communities.
- Investigate the programs and practices within Jeffco that are successful and share across the system; make specific plans to scale them up.

3. Recommendations on IEP Development:

- Provide professional development on writing compliant IEPs in general and in writing standards-based IEP goals in particular.
- Provide specific IEP training for new staff and assign experienced mentor for each new certificated special education staff member.
- Provide IEP development review annually.
- Assign district level special education administrator(s) to randomly check IEPs for compliance and relevancy.

4. Recommendations on Policies and Procedures:

- To ensure compliance with state and federal laws and regulations for implementing special education, provide professional development to site administrators, special education staff, and any staff who serve students with disabilities on the use of the *Special Education Practitioner's Manual*.
- To assist with understanding special education policy and procedures and use of the *Special Education Practitioner's Manual*, a current link to the "point of contact" for each school would assist users in readily identifying who to ask for specific questions.

5. Recommendation on administrative infrastructure:

- Special education department administrative team should meet with the operational and support departments to identify some “low hanging fruit” to address soon to gain some efficiencies; and then include these operational and supportive functions in long term strategic planning for improvements in special education.
- Find ways the special education department administrative team can help with efficiencies. Determine productive connections between compliance technicians and personnel at the school level who are responsible for student records.

6. Recommendations on Management Structure:

- Continue to implement the new management and support structure by:
 - Providing communication to all staff about the support structure and,
 - Creating a quality control system for the new structure to ensure quality, equity and consistency.
 - Continue to collaborate with general education to align and improve communication and common key messages.

7. Recommendations for Improved Climate, Culture, and Communication:

- As part of the design of an aligned system of support, create feedback loops where levels of the system (district, site, class, stakeholders) are included and informed. Define when, where, and how ongoing communication will occur. The development of a comprehensive system of support should include alignment to Jeffco 2020 and key initiatives.
 - Communication system should create an online, email, telephone and face-to-face communication system to ensure all stakeholders from parents to teachers and site administrators have timely, accurate, consistent information and support.
 - Materials should be created to be shared with parents on the district’s website, as well as in meetings to help parents understand special education, who to call for what, and how to navigate the system including different types of transitions between settings.

Task 3 Recommendations:**8. Recommendations for improving access to inclusive opportunities:**

- Convene a stakeholder group to analyze placement options, data, and make recommendations about a full continuum of placement options for grades preschool through grade 12 and,
- Provide professional development and coaching support on inclusive practices so the transition to less restrictive practices can be more successful.
- Provide a clear picture of the current continuum of services so that parents and staff can understand placement options, especially around the transition from pre-K to K, elementary to middle, and middle to high, and from settings that are less restrictive to more, and more restrictive to less.
- Provide clear communication on an ongoing basis to staff about the vision for improving access to inclusive opportunities, what this looks like, and the supports that are available to make this happen.

9. Recommendation on developing a district-wide system of supports:

- Given the range of responses about the common understanding and use of MTSS, provide professional development about MTSS as described in the Jeffco Special Education Practitioner’s Manual and the Colorado Department of Education website @ <https://www.cde.state.co.us/mtss> as a beginning of development of a common understanding of an aligned system
- Develop structures and processes to create an aligned system of supports.

10. Recommendation for fiscal

- Given that nearly 90 percent of the district's special education program expense is for staff compensation the district should continue to utilize the Guiding Principles for Allocations of Special Education Staff to optimize staff levels. Additionally, the district should review allocations of Health, School Psychologist and Occupational Therapist positions for reasonableness.

Overarching Themes:

To assist with systemic alignment and implementation of the recommendations, overarching themes were developed. A crosswalk was created with the recommendations from each task and overarching themes were created based on systemic needs.

It is important to note that during the period in which this project has been operationalized (started April 2015), some changes have already been designed and are already underway. From senior level leaders, commitment is acknowledged, and changes in administrative position locations, staff assignments, and other indicators of change are embraced and appreciated by personnel at the most senior levels of leadership. Deep systemic work across all levels of the system is just starting.

"A central theme of the research on district improvement is that districts that make rapid and dramatic improvement are, to no surprise, focused intensively on improving all aspects of the district as a system, from the central office to classroom instruction. In rapidly improving districts, improvement capacities refer to district structures, policies, processes, and programs intentionally designed to improve overall organizational capacity and the quality of teacher instruction." (Lane, B 2009)²

The overarching themes below combine the findings, recommendations and supporting research to provide an aligned approach to implementation of systems improvements.

Aligned Systems

Develop structures and processes to create an aligned system of supports, resource allocation, and better prepare district special education leadership to engage in iterative opportunities to inform and influence the system that facilitate the implementation of the district's vision.

In order for all students to achieve college, career, and civic life readiness by the time they leave the school system, all levels of that system must be coherent. Embedding special education supports within the general education system requires a continuous improvement process built on the norm of collaboration. Collaboration, if planned and executed with foresight and clarity, positively impacts the culture and climate of a system at all levels. Working with a common purpose and goal in mind increases the efficiency with which work is completed resulting in clearer communication and expectations throughout the organization. The following considerations act as the foundation to begin the re-alignment process: Do staff know what is expected of them? How do they know? Do they do it? How do supervisors and support systems know?

Creating the time to prioritize and re-align systems can be daunting, especially as systems are started and habits formed. There has been a concerted effort put forth in Jeffco to engage in shared decision-making regarding special education programming; however, it does not appear to be systematic in nature nor has it become part of the district's norm.

A consistent concern identified by a variety of stakeholders was the number of department changes, and the next best thing as challenges presented by continually reorganizing the overall special education department. Time is the essence and given limited resources, attention to the

² Lane, B. (2009). *Exploring the pathway to rapid district improvement*. Lincoln, IL: Center on Innovation and Improvement. Retrieved from <http://www.centerii.org/survey>

number of change initiatives that are being undertaken at any given time, and the explicit connections of each initiative toward the success of the district transformation must be considered. Individuals seem overwhelmed by the volume of various change initiatives and don't perceive some initiatives as aligned towards overarching goals. As a result, they may individually pick and choose what to prioritize, leading to fragmentation and concerns about implementation fidelity.

Culture/Climate/Communication

Create and sustain an inclusive culture of high expectations for all students, recognizing that students with disabilities are part of the larger educational system by enhancing the district's systems of communication so that all relevant stakeholders receive timely, accurate information to increase their knowledge, skill, and efficiency in supporting students.

A majority of students with disabilities spend 80% or more of their school day in regular education classrooms. Nationally there is an explicit understanding by successful educators, that in order for students to succeed, all teachers involved with a given student need to feel responsible for, and committed to, ensuring that child's success...they each need to equally "own" the student's outcomes. When raised to the district systems level, the same is true. It cannot be the role of one Department to ensure success for the district's students with disabilities. These children are first and foremost, members of the larger general educational system that is "The District". Special education services should by design be supplemental to the teaching and learning conditions of the general education system.

"In a coherent system of education, all children and students with disabilities are considered general education students first; and all educators, regardless of which students they are assigned to serve, have a collective responsibility to see that all children receive the education and the supports they need to maximize their development and potential" (California Special Education Task Force, March 2015)³.

During the past year, the Jeffco community has seen strong attention both internally and in the media on the perceived conflicts within the School Board that have had implications for building a district-wide culture and climate of trust and shared values. Such media focus has fueled a climate of distrust, due in part to the size of the district, creating an even greater challenge in making sure accurate communication reaches all stakeholders. Building trust is a clear and powerful underlying charge associated with creating a district-wide culture of collaboration and it begins with communication.

Established routines will help to address the communication challenges presented by a large district, and towards that end, implementing the other recommendations in this report will be instrumental in achieving an inclusive vision for the district. A lack of strategic communication channels that flow from the central office and district leadership, then to the schools within their zones, can lead to misunderstandings and differential expectations about vision, priorities, and implementation efforts.

Communication efforts must be proactive rather than reactive, so that relevant individuals – within or external to the organization, as appropriate – know what is happening, when it is happening, and how it will happen before change occurs. Designing more intentional and strategic communication is necessary between special and general education personnel to support the integration of special education services in students' educational programming. Sites need readily accessible information to proactively and reactively problem-solve, including who to contact for information, under what conditions, and the mechanisms for engaging such information channels at any given time. Further, transition junctures in students' lives require diligent communication across more stakeholders to ensure seamless processes.

Existing systems can be expanded and/or enhanced. For example, the Special Education newsletter is a mechanism that capitalizes the use of an existing communication system and may eventually reach a larger audience or address a targeted audience. Another example of an

³ One System: Reforming Education to Serve All Students Report of California's Statewide Task Force on Special Education MARCH 2015 (<http://www.smcoe.org/about-smcoe/statewide-special-education-task-force/>)

existing system that can support communication is the current organization structure of teaming between the special education administrators and achievement directors to serve schools in a collaborative consistent approach for and guidance.

A key consideration is: how will changes be communicated to the site level and then the implementation of changes supported? Working with the existing Communication Services Department can provide additional resources and expertise in effective communication strategies. Communicating a culture of shared vision and trust must align with a comprehensive professional learning program.

Professional Learning for A Coherent System

Create a district culture and climate of inclusiveness by aligning with the district vision and key initiatives and by providing on-going, combined professional development that includes high expectations and ownership of all students by all staff. By providing staff with mutual training, the message and belief in a unified special education/general education system, conveyed by district leadership, is reinforced and contributes to high quality teaching leading to improved results for all students.

All respondents indicated a high degree of desire to work to improve the overall program within Jeffco. There was very high participation in the study by all stakeholders and there was an overwhelming degree of willingness to support changes across the district.

There is a need for differentiated, focused and relevant professional development based on identified needs of staff. Professional development should focus on supporting students with diverse needs in academics and behavior, effective literacy instruction, and IEP compliance. Integrating compliance requirements into educational decision-making at various levels of the system can also empower the district to make informed, proactive decisions in terms of specific compliance training needs resulting in differentiated professional learning for school sites. Additionally, data sources indicated a lack of knowledge and ability of staff regarding accommodation and modification strategies to support the diverse needs of learners with disabilities as well as all learners who struggle.

Special Education case managers know their responsibility is to “Case Manage” students with disabilities, but many are unclear on the specific skills and behaviors that support that case management role or feel torn between their role as a case manager and classroom teacher. Providing criteria and goals, utilizing a systematic approach for monitoring progress regarding the goals, and demonstrating how goals can be measured, can facilitate the alignment of compliance procedures and instructional practices. Attention must also be paid to special education-specific training for special education teachers and related services staff focused on evidence-based practices in their area of expertise.

Support for administrators who facilitate IEPs, general education teachers who provide high quality instruction to most students with disabilities, instructional aides who are sometimes the first line of communication for students with disabilities (and, in many cases are provided the least amount of training), and parents who may implement strategies at home for further generalization must be considered within the context of a comprehensive, district-wide professional development plan. When personnel understand their work expectations and are better prepared to support students with aligned communication, processes, procedures, and professional development student outcomes improve.

Acknowledging the efforts of personnel is essential for job satisfaction and retention (e.g., past practice was to go to sites to publicly celebrate teachers at their five-year mark). When engaging in site visits and personnel discussions, it will be important to approach staff with a growth mindset, recognizing their efforts and learning how to support their growth and development. All stakeholders must have the information they need in order to provide high quality instruction to diverse learners that includes both compliance and inclusive, current, evidence-based practices.

Continuum of Services

Examine the available services and programming options to ensure the least restrict environment as required by IDEA and improve their abilities as written in the Jefferson County Education Service District mission statement.

There was high agreement from a variety of stakeholders to examine the available services and programming options to ensure the least restrict environment as required by IDEA. There appears to be varying teacher allocations, supports at different levels, and limited specialized secondary programming options for students with more severe needs. Based on the national data, a special education teacher in the median district supports 17.3 students with special needs. Interview data indicates the elementary special education learning specialist allocation was at a 19:1 student – teacher ratio. However, no consistent student teacher ratio was reported at the secondary level ranging from 22 to 36 students per learning specialist. While speech and language related service personnel indicated the caseload was aligned with American Speech Hearing Association recommendations, assistive technology staff and nursing personnel allocations were two related service personnel identified as too stretched in order to meet the many needs of their students.

A joint research study between Colorado Department of Education and National Center on Low-Incidence Disabilities revealed the number of students assigned to teacher caseloads has significant implications for both student learning and teacher attrition (Gersten, Keating, Yovanoff, & Harniss, 2014⁴⁴; Russ, Chiang, Rylance, & Bongers, 2001⁵⁵). Since 1990, Colorado has reported special education teachers as a United States Department of Education, Teacher Shortage Area. In addition, based upon a review of the literature, Russ and colleagues (2001) found that large caseloads and instructional group sizes negatively impacted student achievement in math and reading as well as a significant correlation between teacher attrition and high caseload. Examining other models of caseload allocation and service delivery can provide the foundation to develop a transparent systemic approach to aligning school needs with students' needs.

There are a variety of specialized programs at the elementary but specific programming settings are not available at the secondary level. There are limited options available for the diverse student needs resulting in out of district placements.

Final Thoughts

Pioneering districts that have begun the transformation process in terms of redefining the central office role suggest central office transformation involve partnerships between principals and executive-level central office staff. Developing and aligning performance-oriented central office services to support district-wide instructional improvement for all students requires a collaborative systemic approach. Setting aside old ways of working and building intentional open communication systems focus on the district's strengths and commitment to student learning. Without a cohesive approach, instructional efforts, resource allocations, and stakeholder engagement will remain fragmented and disconnected from general education processes and whole system supports.

Overarching Recommendations By Themes:

Below is a list of the recommendations categorized by the common themes which emerged from the review and analysis of findings, and are ordered by frequency of finding. The actionable list below should assist in determining developing a long term plan with immediate and intermediate next steps.

⁴⁴ Gersten, R., Keating, T., Yovanoff, P., & Harniss, M. K. (2001). Working in special education: Factors that enhance special educators' intent to stay. *Exceptional Children*, 67(4), 549– 567.

⁵⁵ Russ, S., Chiang, B., Rylance, B. J., & Bongers, J. (2001). Caseload in special education: An integration of research findings. *Exceptional Children*, 67, 161-172.

1. Aligned Systems - *Develop structures and processes to create an aligned system of supports, resource allocation, and better prepare district special education leadership to engage in iterative opportunities to inform and influence the system that facilitate the implementation of the district's vision for all students.*

- a. Implement a district-wide system for academic, social emotional and behavioral interventions and supports for struggling students by utilizing an overarching framework for integrating and aligning supports such as multi-tiered system of supports (MTSS).
 - i. Develop district-wide policies and structures for identifying students who are struggling academically by developing processes to discuss and identify strategic supports, instructional strategies and differentiation within general education to better support all learners. In addition to supplementary supports and interventions, which accelerate students toward grade level standards, there should be ongoing collaborative, grade-level discussions where teachers are reviewing data to determine where additional supports and interventions are necessary.
 - ii. Continue to increase inclusive options (such as co-teaching) for all students in special education by developing systemic structures to build and support inclusive education and full participation in the academic and social culture of the school.

2. Culture/Climate/Communication - *Create and sustain an inclusive culture of high expectations for all students, recognizing that students with disabilities are part of the larger educational system, by enhancing the district's communication processes so that all relevant stakeholders: stakeholders receive timely, accurate information to increase their knowledge, skill, and efficiency in supporting students.*

- a. Create a district culture and climate of inclusiveness aligned to the overall District Vision and the Strategic Plan by ensuring that high expectations and ownership of all students by all staff is a cornerstone of the belief system.
- b. Create formal communication structures and relationships within the district and with families including involvement in decision-making, ongoing meetings and opportunities for dialogue, and expectations for responding to communications and concerns.
- c. Provide strategies and processes for increasing engagement and involvement with families and community members.
- d. Review all communication processes to ensure that there are processes for ongoing information sharing, two-way communication and input, and time allocated within job roles and responsibilities for responding to emails and phone calls in a timely manner.

3. Professional Learning for A Coherent System - *Create a district culture and climate of inclusiveness by aligning and by providing on-going, combined professional development that includes high expectations and ownership of all students by all staff. By providing staff with mutual training, the message and belief in a unified special education/general education system, conveyed by district leadership, is reinforced and contributes to high quality teaching leading to improved results for all students.*

- a. Build the district culture and climate of inclusiveness by providing on-going, joint professional development that includes high expectations and ownership of all students by all staff. By providing staff with joint training, the message and belief in a unified special education/general education system, conveyed by district leadership, is reinforced and contributes to high quality teaching leading to improved results for all students.
- b. Create differentiated, focused and relevant professional development based on identified needs of staff. Professional development should focus on supporting students with diverse needs in academics and behavior. Needs identified for professional development include:
 - i. Focused strategies to support students who struggle academically such as Universal Design for Learning (UDL), differentiated instruction, higher order thinking skills, and specific tailoring of instructional strategies to address student needs.

- ii. Training and coaching on strategies to improve collaborative discussions between general education and special education educators. This professional development should include the utilization of data to identify student needs, and identifying focused and targeted supports and intervention strategies.
- iii. Writing compliant IEPs in general and in writing standards-based IEP goals in particular. Provide specific IEP training for new staff and assign experienced mentor for each new certificated special education staff member. Provide IEP development review annually.

4. Continuum of Services - *Examine the available services and programming options to ensure the least restrict environment as required by IDEA and improve their abilities as written in the Jefferson County Education Service District mission statement.*

- a. The executive cabinet and student services department should take the time to develop a deeper understanding of health services concerns and all staffing issues presented here in relation to other findings raised in this report, to develop a systemic and long-term process to provide services to students with disabilities in an equitable and efficient manner.
- b. Create a transparent process for special education staff allocations which involves stakeholders to create a more positive culture. Develop an ongoing process for communicating staffing processes and decisions in a timely manner.
- c. Develop a process to allow more precise tracking of special education personnel expenditures which should include a:
 - i. Review all special education personnel categories and combine similar positions to reduce the number of categories and align more closely with state and similar district special education personnel categories,
 - ii. Review position descriptions, descriptions of programs and services and develop guidance to sites and staff (including IEP teams) to allow for a better understanding of roles and responsibilities of various positions and types of programs and services across the district.
- d. Finalize allocations earlier to allow schools to hire in time for the start of the school year to minimize vacant positions.

Systemic Approach to Implementation of Recommendations

While the above recommendations could be approached and implemented by individually addressing each item, it is recommended that the district utilize a systemic approach to designing an overall system of supports to address the needs of students receiving special education supports.

1. Implement a district-wide system for academic, social emotional and behavioral interventions and supports for students with disabilities and struggling students by utilizing an overarching framework for integrating and aligning supports such as multi-tiered system of supports (MTSS).
 - a. Under the MTSS Framework a implementation teams working at the district, school and course levels will develop an overall system designed to address the needs of all students and align supports and services where needed. Collaborative teams will utilize student data to identify students who need supports and determine how those supports will best be provide designed to provide instruction and interventions with appropriate levels of support. The teams will utilize feedback loops to ensure that systemic issues are addressed at the appropriate level (district, school, course, or student levels) and provide ongoing communication across the system.
 - b. Create a district culture and climate of inclusiveness through alignment to the District Strategic Plan by providing on-going, joint professional development that includes high expectations and ownership of all students by all staff. By providing staff with joint training, the message and belief in a unified special education/general education system, conveyed by district leadership, is reinforced and contributes to high quality teaching leading to improved results for all students.
 - c. Develop, integrate and align the processes for Response to Intervention (RtI) and Positive Behavior Interventions and Supports (PBIS) under the MTSS framework to ensure that processes, supports and services are provided effectively, efficiently and equitably across the district.
2. Under the MTSS framework, develop a district-level team, with representation of general education and special education, to develop a district-wide service delivery model for all students receiving special education services under the MTSS Framework which aligns with the overall district vision, key initiatives, and is focused on improving results, providing access to high quality instruction, providing inclusive options and closing the achievement gap for all students with disabilities. Based on the data included in this report, the committee would make recommendations on ways to improve the quality of instruction under the co-teaching model, as well as the design of resource room and separate classes.
 - a. Each service delivery option should be based on designed with a growth mindset vision, should maximize access to general education curriculum and peers, and should align to a district-wide system of supports and interventions designed to provide high-quality instruction at all levels to assist students to achieve improved outcomes.
3. Under the MTSS framework, provide on-going, joint, focused and relevant professional development and coaching for quality Tier 1 (general education classroom) instruction based on needs identified by staff with an emphasis on supporting students with diverse needs in academics and behavior. Needs identified for professional development include:
 - a. Focused strategies to support students who struggle academically such as Universal Design for Learning (UDL), differentiated instruction, higher order thinking skills, and specific tailoring of instructional strategies to address student needs.
 - b. Training and coaching on strategies to improve collaborative discussions between general education and special education educators. This professional development should include the utilization of data to identify student needs, and identifying focused and targeted supports and intervention strategies.

- c. Provide on-going, joint professional development and coaching to improve the co-teaching model; utilize data to inform scheduling and placement decisions regarding co-taught classes; build the structures required to make co-teaching a sustainable and effective practice to improve student learning outcomes
 - d. Provide collaborative planning time for general and special education teachers to work together to meet the needs of all students
- 4. Provide general education teachers with student's IEP within two-weeks of start of school in the form of the IEP and/or a one-page summary of needed accommodations
 - a. Develop district-wide policies and structures for identifying students who are struggling academically by developing processes to discuss and identify strategic supports, instructional strategies and differentiation within general education to better support all learners. In addition to supplementary supports and interventions, which accelerate students toward grade level standards, there should be ongoing collaborative, grade-level discussions where teachers are reviewing data to determine where additional supports and interventions are necessary.
 - b. Continue to increase inclusive options (such as co-teaching) for all students in special education by developing systemic structures to build and support inclusive education and their full participation in the academic and social culture of the school.
- 5. Update and develop consistent policies, procedures and program descriptions and objectives, and provide training on revisions
 - a. Develop policies and procedures that include compliance procedures, program development and service delivery descriptions, and personnel staffing ratios and responsibilities, and referral and placement processes. Include all relevant stakeholders in the development of policies and practices leading to results identified in the development of policies and procedure.

Appendices

Appendix A: Staffing Allocations

As with most programs and supports that are part of K-12 education, personnel comprise the vast majority of program expenses. Routine review of staffing levels, assignments, and effectiveness is an important part of ensuring that special education services are high quality, effective and efficient. Table A reflects the district special education personnel data provided by the Colorado Department of Education based on December 1, 2015 count.

Job Code	Job Title	JeffCo	Aurora	Boulder	Cherry Creek	Denver	Douglas
2505	Behavior Analyst	8					
220	Behavioral Specialist		7	3		5	3
2506	Coach Special Education	3					
2595	McLain Teacher FT Spec Ed	2					
2808	Tchr EC SPED_Sch Based	26					
202	Teacher, Special Education		274	217	346	665	354
2809	Teacher Mtn View Spec Ed	1					
2810	Teacher Special Ed Specials	2					
2811	Tchr SPED Learning Specialist	289					
2812	Teacher SIED	45					
202	Teacher, Title 1			19		4	6
2813	Educational Consultant	6					
410	Educational Interpreter		16	5	15	15	9
2815	Tchr EC SPED_Cen Based	7					
2816	Teacher Adaptive PE	2					
2817	Teacher SLIC	21					
2819	Tchr Significant Support Needs	39					
2821	Teacher Hearing Disability	11					
2822	Teacher Visual Disability	8					
2823	Tchr Special Educ Transition	11					
2825	Teacher Autistic	22					
2826	Teacher Multiple Disabilities	10					
416	Teaching Assistant, Special Education		233	278	701	489	487
419	Teaching Assistant, Title 1			11			
212	Curriculum Specialist Consultant		27	6	120	117	
214	Educational Diagnostician		8		10	15	
3171	Hearing/Vision Assessor	1					
3170/231	Audiologist	4	2	2	5	7	4
3140/233	Registered Nurse_Cen Based	40	42	13	67	96	31
232	Licensed Practical Nurse			2	5	2	
3143	Nurse - Diabetes Resource	2					
3144	NOSA Nurse on Special Assign	1					
3145	Registered Nurse_Sch Based	5					

3120/234	Occupat Therapist _Cen Based	22	21	18	50	28	49
3122	Occupational Therapist - ECE	7					
3123	Occupat Therapist _Sch Based	2					
421	Occupational Therapist Assistant			2	4	3	6
3110	Therapist Physical _Cen Based	4					
3111/235	Physical Therapist - ECE	6	8		11	10	
3112	Therapist Physical _Sch Based	3					
422	Physical Therapist Assistant		1	3			1
3150/236	Psychologist	58	41	22	73	118	74
3152	General Ed School Psychologist	6					
3180/238	Speech/Lang Pathologist	97	54	50	98	101	122
3182	Speech/Lang Pathologist ECE	19					
3183	Coord - Speech Lang Pathologis	1					
3181/241	Speech/Lang Pathologist Asst	9				2	
413	Speech-Language Paraprofessional						33
237	Social Worker		22	17	49	101	41
301	Health Specialist				1		
330	Child Find Coordinator		1	1	1	2	1
347	Staff Developer		1		2	18	18
371	SWAAAC Coordinator		1		1		1
355	SWAP Coordinator					1	1
423	SWAP Specialist			2	2	1	
409	Health Care Technician		34	52	27	47	81
424	Health Screener			4		13	
5632	Parapro - Spec Ed Build Supp	197					
5646	Para Educator - Transition	27					
8200	Para Educ - Center	39					
G8200	Grant-Para Educ Center	215					
G8201	Grant-Para Educ Inst Supt	86					
5653	Title I Parapro-SpecEdBuildSup	35					
8202	Para Educ - Title I Ctr	3					
G8202	Grant-Title I Para Educ Center	61					
G8203	Grant-Title I Para EducInstSup	15					

Appendix B: Health Services Interview, Discussion and Recommendations

The Director of Health Services was interviewed twice, on Oct 8 and Dec 2. In addition, 8 to 10 nurses also participated in a focus group, and two of the nurses at Miller were interviewed. The following findings were triangulated across two or more focus groups or interviews and supported by WestEd observations.

It is important to recognize the role of health services within a large school district like Jeffco. Essentially the district is running a complex health care delivery system within an educational agency. But if you look at this health care system each component is running in deficit mode.

Description of the system: There are 46 (or 48?) District Registered Nurses (RNs) operating a delegated care model where RNs provide training, and support to clinic aids in each school and paraprofessionals in each SN3 program and delegate much of the care to them. The training is supposed to be to “proficiency and competency.” Support should include regular consulting and monitoring with clinic aids and paraprofessionals who are delivering the services.

This model is serving 36 intensive center programs (SN3) and all district schools. Students with chronic health needs are not just at Miller – they are in all of these SN3 programs. Jeffco has seen enormous growth of chronic and significant health needs such as allergies, asthma, diabetes, seizures and transplants, as is true is school district everywhere.

Concerns:

- Vision for staffing for needs of children with significant needs
- Capacity of current model
- Risk exposure

Vision for staffing for needs of children with significant needs –

There has not been a conversation about staffing ratios for special education center-based programs, or a clear discussion about what appropriate staffing levels are for a delegated care model, overall. In Jeffco there is one nurse for every 162 students with disabilities. In our comparison districts there is one nurse for every 60 students with disabilities.

What is the district’s vision for health services for students with significant disabilities? The SN3 programs rely on paraprofessionals to meet health needs of students. Special education paraprofessionals are not receiving sufficient training because there are not enough nurses to train them. Also, often the staff are not available prior to the start of the school year to receive training due to contractual issues and delayed staffing allocation and/or hiring. Additionally, the RNs are forced to cover those vacancies in SN3 classrooms or school health offices, preventing them from meeting their responsibilities under a delegated care model. In 2015-16, 26 of 36 SN3 programs started the year not fully staffed. The current model does not leave RNs enough time to develop all the training resources nor provide the training effectively.

While Miller is a school designated to serve students with significant health needs, there are students with significant health needs in many of the schools. Miller’s nursing is staffed by default. It has gone from 300 to 90 students but retains the same nursing staffing. There is controversy about the perceived and real need for nursing services at Miller. Without a clear vision for health services for students with severe disabilities, defining the care model(s) and the appropriate staffing levels, controversy will continue.

What is the district’s vision for health services for students with severe mental illness? “Nursing support is not adequate at some sites with a high number of students with intensive needs.” There is not a nurse currently assigned to Sobesky. With Sobesky expanding, this is a concern.

Capacity of current model –

The current Director of Health Services oversees health care in 230 sites including preschools, supervises 48 RNs, is responsible for recruitment and hiring, and last year completed 80 performance evaluations in a pay for performance system. She has no medical director. (Many

school districts of this size do have a paid medical director. Think of this in the same way school districts rely on legal counsel.)

The same issue of special education paraprofessional availability for training is true for clinic aids in each school. Clinic aids start work on the first day of school, making it difficult to get them trained. When the paras and/or clinic aids are not hired on time, it becomes even more difficult to get them trained. Preschools have increased 100% in the last 5 years. This has a cumulative effect at a school.

Within Student Based Budgeting there is one small line for clinic aids. What are the institutions schools are being given about this? Part time secretaries are the back up, but their staffing has been cut, and they are refusing to support the clinic due to risk. Students from SN3 programs are coming to the clinic for a diaper change in situations where the program is short on paras, or other reasons. Secretaries are refusing to change diapers.

Risk exposure-

There is a concern that the district might not fully understand its exposure to risk within a health services system that is not functioning well. There is a Colorado house bill 219 called Claire's Law that speaks to schools being held accountable and clarifies that there is not government immunity. There does not seem to be an expectation that district leaders take responsibility for informing school staff, facilities staff and families the role of health services within the school system and what nurses need to be successful. Nurses are concerned about their legal responsibility and license when support decisions are made without them that are not adequate. "District administrators must communicate to site principals the needs nurses have to legally and professionally provide services for individual students. It is not a case of principal preference."

An example of the lack of understanding and ownership is that health services is not part of district program planning and does not even get a list of new center programs so that she can staff proactively. "Administrators including Principals do not understand nursing services or what nurses need to be effective collaborators and service providers. Facilities decisions are made without considering the needs of vulnerable students. Students who require nursing services need water and space for supplies nearby." This has been particularly troubling with the increase in preschool programs. There is inadequate preparation for transfers of individual students with high medical needs. Programs and staff are often moved or transferred without regard for health services implications.

Currently there is a shortage of RNs in the district. The pay level for nurses, health aids, paras and clinics was dropped and benefits are not provided, whereas food service and transportation have benefits. Health care has been marginalized in Jeffco. Last school year 20 schools went uncovered through December due to salary cuts and unexpected resignations.

There is a question about the accuracy of the district's reports of student restraints. Further analysis is needed of crisis prevention and restraint data and the number of staff and student injuries that are occurring. This is an area of concern that was raised, but not addressed by this review.

Nurses are not part of some IEP meetings where they are required, either because they were not informed, were not given sufficient notice, or the meeting gets changed without telling the nurse. Nurses are not in buildings enough to build the relationships and trust needed to be effective. Because of this, the district does not adequately plan for the students with medical needs.

An additional concern that needs further review is how is the identification of students as being eligible for special education due to an Other Health Impairment compromised by a health services system that is spread too thin. The same concern exists for eligibility for accommodations and services under Section 504. The district is particularly vulnerable to complaints from the Office of Civil Rights, and subsequently being asked to pay monetary damages.

Recommendations –

Overall – the Health Services Department has additional data to share regarding these concerns and others. The executive cabinet and student services department should take the time to develop a deeper understanding of health services concerns in relation to other findings raised in this report, and in relation to Jeffco2020 priorities, and develop a plan to address immediate and long term needs. Determine what immediate action is needed.

Vision for staffing for needs of children with significant needs

- Determine district's model of care for health services for students with significant needs including training requirements and ratio of health services providers in special education programs, in relation to the number of students in the program and the severity of their need, number and type of staff, and the relative needs of the school where the program is housed. Specify anything that is different for special sites.
- Consider the costs and benefits of utilizing LPNs in place of paraprofessionals in special education center programs, and in which circumstances that may make sense. They can be paid similarly to paraprofessionals and can provide constant nursing care.
- Immediately modify communication structure and program planning process to include The Director of Health Services or her designee. Determine a process for involving the nurse on transfers of students with medical needs, transfers of staff with specialized training and program moves.

Capacity of current model

- Convene a group of stakeholders to articulate a vision for the health services model that aligns with Jeffco2020 and district's priorities.
- Outline the current areas of deficit in relation to that vision. Pay particular attention to the capacity of the current administration and staffing levels, training needs, contracted days, and allocation/hiring processes to facilitate an effective model, whether delegated care or other.
- Establish a budget and an implementation plan to achieve the vision. Determine a process for schools to look at health services within student based budgeting. Consider bell-to-bell clinic aid coverage.

Risk exposure

- Further examination of current risk exposure is warranted, in light of the issues raised in this report. Specific areas for examination should include:
 - Examination of equity issues, shortages and other problems caused by the district's pay and benefit structure. Consider that these changes may have further marginalized health care within a system where their value is already misunderstood.
 - The systems and structures that may be lacking at the district level, in order to assure that Principals and others understand their responsibilities in meeting the health care needs of students in their care.
 - Data on frequency student restraint, and accuracy of the data, as well as incidence staff and student injuries at school
 - Percentage of students being serve on 504 plans and numbers of students being identified as having an Other Health Disability, as compared with similar Colorado school districts, and a general examination of compliance with these plans and services.

Appendix C: Dear Colleague Letter, Office of Special Education Programs, Guidance on FAPE

Dear Colleague:

UNITED STATES DEPARTMENT OF EDUCATION OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES

November 16, 2015

Ensuring that all children, including children with disabilities, are held to rigorous academic standards and high expectations is a shared responsibility for all of us. To help make certain that children with disabilities are held to high expectations and have meaningful access to a State's academic content standards, we write to clarify that an individualized education program (IEP) for an eligible child with a disability under the Individuals with Disabilities Education Act (IDEA) must be aligned with the State's academic content standards for the grade in which the child is enrolled¹. Research has demonstrated that children with disabilities who struggle in reading and mathematics can successfully learn grade-level content and make significant academic progress when appropriate instruction, services, and supports are provided². Conversely, low expectations can lead to children with disabilities receiving less challenging instruction that reflects below grade-level content standards, and thereby not learning what they need to succeed at the grade in which they are enrolled.

The cornerstone of the IDEA is the entitlement of each eligible child with a disability to a free appropriate public education (FAPE) that emphasizes special education and related services designed to meet the child's unique needs and that prepare the child for further education, employment, and independent living. 20 U.S.C. §1400(d)(1)(A). Under the IDEA, the primary vehicle for providing FAPE is through an appropriately developed IEP that is based on the individual needs of the child. An IEP must take into account a child's present levels of academic achievement and functional performance, and the impact of that child's disability on his or her involvement and progress in the general education curriculum. IEP goals must be aligned with grade-level content standards for all children with disabilities. The State, however, as discussed on page five, is permitted to define alternate academic achievement standards for children with the most significant cognitive disabilities.

Application of Provisions in the Elementary and Secondary Education Act of 1965 to Children with Disabilities

Since 2001, the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the No Child Left Behind Act of 2001 (NCLB), has required each State to apply the same challenging academic content and achievement standards to all schools and all children in the State, which includes children with disabilities. 20 U.S.C. §6311(b)(1)(B). The U.S. Department of Education (Department), in its regulations implementing Title I of the ESEA, has clarified that these standards are grade-level standards. 34 CFR §200.1(a)-(c). To assist children with disabilities in meeting these grade-level academic content standards, many States have adopted and implemented procedures for developing standards-based IEPs that include IEP goals that reflect the State's challenging academic content standards that apply to all children in the State.

Interpretation of "General Education Curriculum"

Under the IDEA, in order to make FAPE available to each eligible child with a disability, the child's IEP must be designed to enable the child to be involved in and make progress in the general education curriculum. 20 U.S.C. §1414(d)(1)(A). The term "general education curriculum" is not specifically defined in the IDEA. The Department's regulations implementing Part B of the IDEA, however, state that the general education curriculum is "the same curriculum as for nondisabled children." 34 CFR §300.320(a)(1)(i). In addition, the IDEA Part B regulations define the term "specially designed instruction," the critical element in the definition of "special education," as

“adapting, as appropriate to the needs of an eligible child, the content, methodology, or delivery of instruction to address the unique needs of the child that result from the child’s disability and to ensure access of the child to the general curriculum, so that the child can meet the educational standards within the jurisdiction of the public agency that apply to all children.” 34 CFR §300.39(b)(3) (emphasis added). Otherwise, the IDEA regulations do not specifically address the connection between the general education curriculum and a State’s academic content standards.

Analysis

The Department interprets “the same curriculum as for nondisabled children” to be the curriculum that is based on a State’s academic content standards for the grade in which a child is enrolled. This interpretation, which we think is the most appropriate reading of the applicable regulatory language, will help to ensure that an IEP for a child with a disability, regardless of the nature or severity of the disability, is designed to give the child access to the general education curriculum based on a State’s academic content standards for the grade in which the child is enrolled, and includes instruction and supports that will prepare the child for success in college and careers. This interpretation also appropriately harmonizes the concept in the IDEA regulations of “general education curriculum (i.e., the same curriculum as for nondisabled children),” with the ESEA statutory and regulatory requirement that the same academic content standards must apply to all public schools and children in the State, which includes children with disabilities.

The IDEA statutory and regulatory provisions discussed above, the legislative history of the IDEA, and clarification the Department has provided on the alignment of the IEP with a State’s content standards in the Analysis of Comments and Changes to the 2006 IDEA Part B regulations also support this interpretation. When it last reauthorized the IDEA in 2004, Congress continued to emphasize, consistent with the provisions in the ESEA, the importance of “having high expectations for [children with disabilities] and ensuring their access to the general education curriculum in the regular classroom, to the maximum extent possible.” 20 U.S.C. §1400(c)(5)(A). The Senate Report accompanying the 2004 reauthorization of the IDEA also explained that “[f]or most children with disabilities, many of their IEP goals would likely conform to State and district wide academic content standards and progress indicators consistent with standards based reform within education and the new requirements of NCLB.” S. Rep. No. 108-185, 105th Cong., 1st Sess. 29 (Nov. 3, 2003).

The Analysis of Comments and Changes accompanying the 2006 IDEA Part B regulations also included important discussion that further clarifies the alignment of an IEP with a State’s academic content standards under the ESEA, explaining: “section 300.320(a)(1)(i) clarifies that the general education curriculum means the same curriculum as all other children. Therefore, an IEP that focuses on ensuring that the child is involved in the general education curriculum will necessarily be aligned with the State’s content standards.”⁴

The Department’s interpretation of the regulatory language “general education curriculum (i.e., the same curriculum as for nondisabled children)” to mean the curriculum that is based on the State’s academic content standards for the grade in which a child is enrolled is reasonable. This interpretation is also necessary to enable IDEA and ESEA requirements to be read together so that children with disabilities receive high-quality instruction that will give them the opportunity to meet the State’s challenging academic achievement standards and prepare them for college, careers and independence. Therefore, in order to make FAPE available to each eligible child with a disability, the special education and related services, supplementary aids and services, and other supports in the child’s IEP must be designed to enable the child to advance appropriately toward attaining his or her annual IEP goals and to be involved in, and make progress in, the general education curriculum based on the State’s academic content standards for the grade in which the child is enrolled.

Implementation of the Interpretation

Based on the interpretation of “general education curriculum” set forth in this letter, we expect annual IEP goals to be aligned with State academic content standards for the grade in which a child is enrolled. This alignment, however, must guide but not replace the individualized decision-making required in the IEP process⁵. In fact, the IDEA’s focus on the individual needs of each child with a disability is an essential consideration when IEP Teams are writing annual goals that are aligned with State academic content standards for the grade in which a child is enrolled so that the child can advance appropriately toward attaining those goals during the annual period covered by the IEP. In developing an IEP, the IEP Team must consider how a child’s specific disability impacts his or her ability to advance appropriately toward attaining his or her annual goals that are aligned with applicable State content standards during the period covered by the IEP. For example, the child’s IEP Team may consider the special education instruction that has been provided to the child, the child’s previous rate of academic growth, and whether the child is on track to achieve grade-level proficiency within the year.

The Department’s interpretation of the regulatory language “general education curriculum (i.e., the same curriculum as for nondisabled children)” to mean the curriculum that is based on the State’s academic content standards for the grade in which a child is enrolled is reasonable. This interpretation is also necessary to enable IDEA and ESEA requirements to be read together so that children with disabilities receive high-quality instruction that will give them the opportunity to meet the State’s challenging academic achievement standards and prepare them for college, careers and independence. Therefore, in order to make FAPE available to each eligible child with a disability, the special education and related services, supplementary aids and services, and other supports in the child’s IEP must be designed to enable the child to advance appropriately toward attaining his or her annual IEP goals and to be involved in, and make progress in, the general education curriculum based on the State’s academic content standards for the grade in which the child is enrolled.

The Department recognizes that there is a very small number of children with the most significant cognitive disabilities whose performance must be measured against alternate academic achievement standards, as permitted in 34 CFR §200.1(d) and §300.160(c). As explained in prior guidance⁶, alternate academic achievement standards must be aligned with the State’s grade-level content standards. The standards must be clearly related to grade-level content, although they may be restricted in scope or complexity or take the form of introductory or pre-requisite skills. This letter is not intended to limit a State’s ability to continue to measure the achievement of the small number of children with the most significant cognitive disabilities against alternate academic achievement standards, but rather to ensure that annual IEP goals for these children reflect high expectations and are based on the State’s content standards for the grade in which a child is enrolled.

In a case where a child’s present levels of academic performance are significantly below the grade in which the child is enrolled, in order to align the IEP with grade-level content standards, the IEP Team should estimate the growth toward the State academic content standards for the grade in which the child is enrolled that the child is expected to achieve in the year covered by the IEP. In a situation where a child is performing significantly below the level of the grade in which the child is enrolled, an IEP Team should determine annual goals that are ambitious but achievable. In other words, the annual goals need not necessarily result in the child’s reaching grade-level within the year covered by the IEP, but the goals should be sufficiently ambitious to help close the gap. The IEP must also include the specialized instruction to address the unique needs of the child that result from the child’s disability necessary to ensure access of the child to the general curriculum, so that the child can meet the State academic content standards that apply to all children in the State.

An Example of Implementation

We provide an example of how an IEP Team could apply the interpretation of “general education curriculum” set forth in this letter. For example, after reviewing recent evaluation data for a sixth grade child with a specific learning disability, the IEP Team determines that the child is reading four

grade levels below his current grade; however, his listening comprehension is on grade level. The child's general education teacher and special education teacher also note that when materials are read aloud to the child he is able to understand grade-level content. Based on these present levels of performance and the child's individual strengths and weaknesses, the IEP Team determines he should receive specialized instruction to improve his reading fluency. Based on the child's rate of growth during the previous school year, the IEP Team estimates that with appropriate specialized instruction the child could achieve an increase of at least 1.5 grade levels in reading fluency. To ensure the child can learn material based on sixth grade content standards (e.g., science and history content), the IEP Team determines the child should receive modifications for all grade-level reading assignments. His reading assignments would be based on sixth grade content but would be shortened to assist with reading fatigue resulting from his disability. In addition, he would be provided with audio text books and electronic versions of longer reading assignments that he can access through synthetic speech. With this specialized instruction and these support services, the IEP would be designed to enable the child to be involved and make progress in the general education curriculum based on the State's sixth grade content standards, while still addressing the child's needs based on the child's present levels of performance⁷. This example is provided to show one possible way that an IEP could be designed to enable a child with a disability who is performing significantly below grade level to receive the specialized instruction and support services the child needs to reach the content standards for the grade in which the child is enrolled during the period covered by the IEP⁸. We caution, though that, because the ways in which a child's disability affects his or her involvement and progress in the general education curriculum are highly individualized and fact-specific, the instruction and supports that might enable one child to achieve at grade-level may not necessarily be appropriate for another child with the same disability.

Summary

In sum, consistent with the interpretation of "general education curriculum (i.e., the same curriculum as for nondisabled children)" based on the State's academic content standards for the grade in which a child is enrolled set forth in this letter, an IEP Team must ensure that annual IEP goals are aligned with the State academic content standards for the grade in which a child is enrolled. The IEP must also include the specially designed instruction necessary to address the unique needs of the child that result from the child's disability and ensure access of the child to the general education curriculum, so that the child can meet the State academic content standards that apply to all children, as well as the support services and the program modifications or supports for school personnel that will be provided to enable the child to advance appropriately toward attaining the annual goals.

Opportunities for Input

We are interested in receiving comments on this document to inform implementation of this guidance. If you are interested in commenting on this document, please e-mail your comments to iepgoals@ed.gov or write to us at the following address: US Department of Education, 550 12th Street SW, PCP Room 5139, Washington, DC 20202-2600. Note that we are specifically interested in receiving input from the field on examples of models of alignment of IEP goals with State content standards that are working well at the State and local level, and how this guidance could be implemented for children with disabilities who are English learners and children with the most significant cognitive disabilities. We will share appropriate models with you in further communications as they become available. We would also be glad to help answer your questions and help with your technical assistance needs in this important area.

We ask you to share this information with your local school districts to help ensure all children with disabilities are held to high standards and high expectations. Thank you for your continued interest in improving results for children with disabilities.

Sincerely,

Michael K. Yudin Assistant Secretary

Melody Musgrove Director Office of Special Education Programs

¹ The Department has determined that this document is a “significant guidance document” under the Office of Management and Budget’s Final Bulletin for Agency Good Guidance Practices, 72 Fed. Reg. 3432 (Jan. 25, 2007), available at www.whitehouse.gov/sites/default/files/omb/fedreg/2007/012507_good_guidance.pdf. The purpose of this guidance is to provide State and local educational agencies (LEAs) with information to assist them in meeting their obligations under the IDEA and its implementing regulations in developing IEPs for children with disabilities. This guidance does not impose any requirements beyond those required under applicable law and regulations. It does not create or confer any rights for or on any person. If you are interested in commenting on this guidance or if you have further questions that are not answered here, please e-mail iepgoals@ed.gov or write to us at the following address: U.S. Department of Education, Office of Special Education and Rehabilitative Services, 550 12th Street SW., PCP Room 5139, Washington, DC 20202-2600.

² For a discussion of this research see Improving the Academic Achievement of the Disadvantaged; Assistance to States for the Education of Children With Disabilities, Final Rule, 80 Fed. Reg. 50773, 50776 (Aug. 21, 2015).

³ In accordance with 34 CFR §200.1(d), for children with the most significant cognitive disabilities who take an alternate assessment, a State may define alternate academic achievement standards provided those standards are aligned with the State’s academic content standards; promote access to the general curriculum; and reflect professional judgment of the highest achievement standards possible. See also 34 CFR §300.160(c)(2)(i).

⁴ See Assistance to States for the Education of Children with Disabilities and Preschool Grants for Children with Disabilities, Final Rule, 71 Fed. Reg. 46540, 46662 (Aug. 14, 2006); see also 71 Fed. Reg. 46579.

⁵ The IEP must include, among other required content: (1) a statement of the child’s present levels of academic achievement and functional performance, including how the child’s disability affects the child’s involvement and progress in the general education curriculum; (2) a statement of measurable annual goals, including academic and functional goals, designed to meet the child’s needs that result from the child’s disability to enable the child to be involved in and make progress in the general education curriculum; and (3) the special education and related services and supplementary aids and services, based on peer-reviewed research to the extent practicable, to be provided to the child, or on behalf of the child, and a statement of the program modifications or supports for school personnel that will be provided to enable the child to advance appropriately toward attaining the annual goals, and to be involved in and make progress in the general education curriculum in accordance with the child’s present levels of performance. 34 CFR §300.320(a).

⁶ See U.S. Department of Education Non-regulatory guidance: Alternate achievement standards for students with the most significant cognitive disabilities August 2005) available at: <https://www2.ed.gov/policy/elsec/guid/altguidance.pdf>

⁷ For information on developing, reviewing, or revising the IEP for a child with limited English proficiency, see: Questions and Answers Regarding Inclusion of English Learners with Disabilities in English Language Proficiency Assessments and Title III Annual Measurable Achievement Objectives <https://www2.ed.gov/policy/speced/guid/idea/memosdcltrs/q-and-a-on-elp-swd.pdf>.

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While the Department does not mandate or endorse specific products or services, we are aware that many States have issued guidance addressing standards-based IEPs. For example see Minnesota Department of Education, Developing Standards-Based IEP Goals and Objectives A Discussion Guide available at:

https://education.state.mn.us/mdeprod/idcplg?IdcService=GET_FILE&dDocName=050483&RevisionSelectionMethod=latestReleased&Rendition=primary. States and LEAs also may consider reviewing the following examples from OSEP-funded projects regarding implementation of standards-based IEPs: inForum: Standards-Based Individualized Education Program Examples available at: www.nasdse.org/portals/0/standards-basediepexamples.pdf. For an example of annual goals aligned with State academic content standards for a child taking the alternate assessment based on alternate academic achievement standards, see: an issue brief provided by the OSEP-funded National Center and State Collaborative (NCSC), NCSC Brief 5: Standards-based Individualized Education Programs (IEPs) for Children Who Participate in AA-AAS available at: <http://www.ncscpartners.org/Media/Default/PDFs/Resources/NCSCBrief5.pdf>.

Appendix D: Job Descriptions for Special Education Department

Executive Director Special Education

- No job description available

Director Special Education

Prepared February 20, 2013, under the supervision of the Executive Director of Special Education, and requires a Masters Degree and 3-5 years experience in schools or central office programming that includes students with special needs. Duties include but are not limited to:

- Special education administrative leadership and management functions for all programs and staff within the department and District
- Planning, coordination and implementation District-wide initiatives, including professional development
- Provide direct supervision and/or evaluation of Special Education of district level personnel and itinerant teams
- Interpret and respond to legal questions, complaints, and situations
- Assist in the monitoring and review of grant and general fund budgets
- Responsible for hiring, allocating, and assigning district level Special Education staff
- Represent and provide leadership for the District with outside agencies on statewide legislative and regulatory task forces and state directors meetings.

Assistant Director Special Education

Prepared April 4, 2013, under the supervision of the Director of Educational Research and Design, and requires a Masters Degree and 3-5 years experience with students with special needs. Duties include but are not limited to:

- Provide professional development and technical assistance to schools, intervene and resolve problems with parents, students, staff, and community in collaboration with building principals
- Coordinate staff and professional development initiatives
- Hire, supervise, evaluate and allocate staff in collaboration with Exceptional Student Services team
- Implement policy and procedures District-wide
- Coordinate instructional programs
- Participate in and chair District wide committees and task forces
- Participate in Educational Research and Design and principal/managers' meetings.

Special Education Partner

Prepared July 16, 2014, under the supervision of the Director of Special Education or designee, and requires valid Colorado licensure and 3-5 years special education experience in a school setting. Duties include but are not limited to:

- Develop working relationships with families and colleagues to understand and use a problem solving process, demonstrating skills in the areas of collaboration, coaching, and consultation with both district and school staff
- Demonstrate knowledge of strategies and interventions for academic/functional, environmental, social/behavioral needs, as well as progress monitoring and data collection systems.
- Work with adult learners in professional development settings and be able to develop, promote, and support adult learning.
- Facilitate the use and interpretation of Functional Behavior Assessments and development, implementation, and progress monitoring of Behavior Support Plans with school teams.

- Support special education staff with processes and appropriate documentation for student placement.
- Support staff with the ENRICH system and problem solve issues that may arise.
- Organize, prioritize, and manage work at multiple sites, and demonstrate flexibility and ability to multi-task.

Elementary Special Education Learning Specialist*

* This job description may also serve for Secondary Learning Specialist (Qualifications: *Secondary Learning Specialist teachers may be required to be Highly Qualified in one or more core content areas, such as English, math, social studies or science.*) Unable to identify when the job description was developed or who the position is supervised by. Requires current Colorado Department of Education teaching license with endorsement in one of the following: Educationally Handicapped, Teacher 1-Moderate Needs, Severe Needs-Communication, Special Education Generalist or Special Education Specialist and, be Highly Qualified in Elementary Education. Duties include but are not limited to:

- Design and implement specialized instruction in one-on-one, small group and large classroom settings.
- Work collaboratively to plan and modify curriculum, team-teach with general educators and to communicate the abilities and needs of special education students.
- Develop, implement and review for appropriateness the behavioral plans for designated students.
- Work in conjunction with a multidisciplinary team to conduct IEP and referral meetings, conferences, and to develop a multidisciplinary approach to the educational enhancement of the student.
- Maintain ongoing communication with regular educators, school staff, students and parents.
- Create a safe supportive and understanding environment for disabled students.

Appendix E: Resources Used in Report

Document	Description	Source	Recommendations
American Speech Language Hearing Association (ASHA)	FAQ on Districts and Workloads for Speech and Language Pathologists	http://www.asha.org/Practice-Portal/Professional-Issues/Caseload-and-Workload/Frequently-Asked-Questions/	Continuum of Services
Caseload Study Year 3:	Colorado Department of Education Special Education AU Survey: Caseload Study Year Three	http://www.unco.edu/ncssd/resources/Caseload_Study_YR3.pdf	Continuum of Services
Colorado Department of Education State Reports	Documents available /required by Department of Education (CDE)		
2010-2015 Special Education State Complaint Reports and Corrective Action Plans	Provides an overview on the various complaints filed with the Department regarding a district's special education services.	http://www.cde.state.co.us/spedlaw/decisions Adams, Boulder Valley/ Cherry Creek /Denver, Adams/Douglas/Jeffco	Professional Learning for A Coherent System
Growth Model Transition Fact Sheet	Fact Sheet on Implementation of Growth Model and statewide assessment.	https://app.box.com/files/0/f/5845168989/1/f_49726175518	Continuum of Services
Administrative Unit State Performance Plan Indicator Profiles: 2011-2012 2012-2013 2013-2014	Reports performance compared to state targets and state performance for 14 indicators from the State Performance Plan (SPP). Indicators reported to the public are a mixture of performance and compliance indicators.	http://www.cde.state.co.us/cdesped/AUperformanceprofiles.asp Adams, Boulder Valley/ Cherry Creek /Denver, Adams/Douglas/Jeffco	Aligned Systems Culture/Climate/ Communication Professional Learning for A Coherent System Continuum of Services
The Colorado Reading To Ensure Academic Development Act (Colorado READ Act)	Passed in 2012, focus on K-3 literacy, assessment, and individual plans for students reading below grade level, addresses students identified as having a significant reading deficiency, delineating requirements for parent communication, and providing funding to support intervention.	https://www.cde.state.co.us/coloradoliteracy	Professional Learning for A Coherent System
Colorado Personnel Shortage Information	Overall description of Colorado Personnel Shortages for 1990-2015. State reporting of teacher shortage areas.	http://www2.ed.gov/about/offices/list/ope/pol/tsa.doc	Culture/Climate/ Communication Professional Learning for A Coherent System
District Staffing Allocations	Colorado Department of Education (CDE) for December 1, 2015 student	Colorado Department of Education	Aligned Systems Continuum of Services

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Document	Description	Source	Recommendations
State Systemic Improvement Plan (SSIP) for the Achievement of Students with Disabilities FFY 2013 – FFY 2018	State's systemic improvement plan (SSIP) and Description of State-identified Measurable Result: Improving the reading achievement of students with disabilities in grades K-3rd.	http://www.cde.state.co.us/cdesped/ssip_colorado_2015	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
Districts Dashboards	District Information on Accountability, Performance) are available as a historical reference.	http://www.cde.state.co.us/accountability/hb_15-1323_accountability_guidance . http://www.cde.state.co.us/uip/uip_trainingandsupport_resources	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
CDE Multi-Tiered System of Supports (MTSS) Website	Multi-Tiered System of Supports (MTSS) overview includes components, resources, and supports.	https://www.cde.state.co.us/mtss	Continuum of Services
CDE Education Evaluation System	The Colorado State Model Evaluation System for Educators. Practical Idea Guides for Evaluating Special Education Teachers	https://www.cde.state.co.us/educatoreffectiveness/statemodelevaluationssystem	Aligned Systems Professional Learning for A Coherent System
School View Data Center	District information regarding accountability, performance, student demographics, financials,	https://edx.cde.state.co.us/SchoolView/DataCenter/reports.aspx?_afWindowMode=0&_afLoop=5651668800880644&_adf_ctrlstate=pac20phbp_4&_adf_ctrlstate=emv0t120f_4	Aligned Systems Culture/Climate/Comm Professional Learning for A Coherent System Continuum of Services
Articulation Area Data by Schools	Overall student demographics for 2013-2014 by schools assigned to an area.	https://docs.google.com/a/jeffcoschools.us/viewer?a=v&pid=sites&srcid=amVmZmNvc2Nob29scy51c3xpbnN0cnVjdGlvbmFsLWRhdGEtcnVwb3J0aW5nfGd4OjJhODc4OTJiMGZiMmRhNDQ	Aligned Systems
Enrollment of Students with Disabilities	Provides enrollment data for students with disabilities.	Colorado Department of Education Pupil Membership Data 2014	Aligned Systems

Document	Description	Source	Recommendations
Student Discipline Data	District reported suspensions and expulsion by the Type of Incident	http://www.cde.state.co.us/cdereval/suspend-expelcurrent	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
Student Teacher Ratio 2014-2015	District profile on full time equivalent teacher per student report.	http://www.cde.state.co.us/cdereval/2014pupilteacherfiteratiobyschoolpdf	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
Teacher by Ethnicity, Race, Gender	Demographic data for Colorado teachers 2014-2015	http://www.cde.state.co.us/search/node/teachers%20by%20ethnicity	Culture/Climate Communication
3 Year Performance Framework	Districts are designated an accreditation category based on the overall percent of points earned for the official year.	http://www.cde.state.co.us/schoolview/performance	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
2014-2015 Teacher FTE and Average Salary	Collected annually to calculate average salaries. Reported to the National Center for Education Statistics	http://www.cde.state.co.us/search/node/2014%20Teacher%20FTE%20Average%20Salary%20and%20Average%20Daily%20Rate%20XLS	Aligned Systems
Personnel Turnover Rate by District	The annual employee turnover rate is the ratio of total separations to the average number of employees. The U.S. Bureau of Labor Statistics defines separations as both voluntary and involuntary employee terminations, including retirements, resignations, dismissals and layoffs.	http://www.cde.state.co.us/cdereval/2014-15turnoverreportpdf	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
Jeffco County School District Forms/Documents	Description	Source	Alignment
District Website	Overview of Special Education Services	http://www.jeffcopublicschools.org/programs/special_ed.html	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System

Document	Description	Source	Recommendations
Various Job Description	Identifies Summary Description, Duties/Responsibilities, Employment Standards/License	Includes: Director of Special Education, Assistant Director of Special Education, Special Education Partner Elementary Special Education Learning Specialist	Aligned Systems Professional Learning for A Coherent System
Student Achievement Data 2011-2015	District data on student performance for all students.	Data Lab and CDE Calculated	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
Student Achievement Data 2014	Colorado Measures of Academic Success (CMAS) Science and Social Studies Spring 2014 Overall Results	http://www.cde.state.co.us/assessment/cmas-sciencesocial-dataandresults	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
Budget/Financial	2014-2015 Adopted Budget Budget/Financials	http://www.jeffcopublicschools.org/finance/documents/2014_15/20142015%20Adopted%20Budget_Companded.pdf http://www.jeffcopublicschools.org/finance/quarterlies.html	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
Student Based Budgeting	Infographic on Student Based Budgeting	http://www.jeffcopublicschools.org/back_to_school/documents/Student%20Based%20Budgeting%20Info.pdf	Aligned Systems Culture/Climate Communication
Jeffco Negotiated Agreement with Jefferson County Education Association	An agreed upon settlement between Jeffco Public Schools and the Jefferson County Education Association.	http://www.jeffcopublicschools.org/human_resources/agreements/JCEA%20Negotiated%20Agreement%202015.pdf	Aligned Systems
Jeffco Negotiated Agreement with Jefferson County Classified Employees Association 2013-2019	An agreed upon settlement between Jeffco Public Schools and the Jefferson County Classified Employees Association.	http://www.jeffcopublicschools.org/human_resources/agreements/CSEA%20%20Negotiated%20Agreement%202013-2019%20Revised%20Final.pdf	Aligned Systems

Jeffco Special Education Department	Documents available /required by Jeffco Special Education Service	Source	Recommendations
2015-2016 Staffing Assignments	Identifies Overall Assignments for special education leadership	Special Education Services	Aligned Systems
2015-2016 Special Education Staffing Assignments	Identifies personnel assigned/allocated for special education	Special Education Services	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
Special Education Policy and Procedures Manual	Procedures posted regarding different procedures and practices	Special Education Services https://sites.google.com/a/jeffcoschools.us/special-education/manual	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
Special Education Newsletter	Department Newsletter December 2015, Issue 8	Special Education Services	Culture/Climate Communication
MTSS Process/Resources	Information on Jeffco MTSS	http://www.jeffcopublicschools.org/academics/rti2e/dited%20(2).pdf	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
Jeffco Area Plan 2016	Presentation on proposed district wide changes.	http://www.jeffcopublicschools.org/community/documents/SPACUpdateFeb17AlamedaandJeffersonAreaPlans_000.pdf	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
Special Education Organizational Chart for 2014-2015	Diagram showing the organizational and the relationships and relative ranks of its parts and positions/jobs.	Special Education Services	Aligned Systems
2014 Jeffco Special Education (S. E) Parent Survey Results	S. E. conducted workgroups with parent's district wide to receive feedback on the families' perspective/experiences of Special Education Services in Jeffco.	http://www.jeffcopublicschools.org/programs/sped_pi_charts_2014.pdf	Culture/Climate Communication
Guiding Principles for Allocations of Sped Staff 2014-15	Internal Document for Allocating Resources	Special Education Services	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System

Document	Description	Source	Recommendations
Student IEPs	Random selection of student IEPs	Special Education Services	Aligned Systems Culture/Climate/Comm. Professional Learning for A Coherent System Continuum of Services
2014-2015 Salary Schedule for Staff	Salary schedules for all personnel	Special Education Services	Aligned Systems
2014-2015 Para Review ISP	Paraprofessionals allocations	Special Education Services	Aligned Systems Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
Placement out of District (POOD) Facility Enrollments July 2013-Aug 2015.	Data on students placed out of the district for placement.	Special Education Services	All
504 Handbook	Information regarding Section 504 of the Rehabilitation Act of 1973 for parents and schools.	http://www.jeffcopublicschools.org/health/section_504.html	All
Jeffco Special Education Program Description	Overall program description	http://www.jeffcopublicschools.org/programs/special_ed.html	All
Communication Strategy Plan 2013-2014	Draft communication strategy plan	Special Education Services	All
Crisis Prevention Intervention (CPI) Training Schedule 2013-2014, 2014-2015	Schedule for training schedule	Special Education Services	All
ELL & Special Education Considerations Sheet	Checklist for considerations	Special Education Services	All
Extended School Year (ESY) Schedule 2015	District schedule for ESY to Programs, location, dates and times.	Special Education Services	All
Mental Health Court Presentation	Provides an overview on a collaborative inter-agency work group.	Colorado Society of School Psychologist Presentation	All
Resources	Description	Source	Recommendations

ERS Teaching: Leadership and Career Pathways	Checklist defines key steps to successful, sustainable, and scalable career pathways that strengthen school leadership, accelerate teacher and student learning, and enrich the teaching career.	https://www.erstrategies.org/cms/files/2736-20-district-checklist-for-teaching.pdf	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
ERS Power Strategy: Data-driven Instruction to Improve Teaching and Learning	Detailed “Best Practices Template” document explores exactly what people, time, and money school leaders need to devote to data-driven instruction; common obstacles; a basic timeline; and case study artifacts.	https://www.erstrategies.org/cms/files/2590-best-practices-template--data-driven-instruction-v2.pdf	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System
ERS Talent Decision Planner	A tool to support talent managers by helping them understand what decisions they need to make and how to make those decisions as strategically as possible.	https://www.erstrategies.org/cms/files/2730-talent-decision-planner-overview.pdf	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System
From tinkering to transformation: Strengthening school district central office performance	Meredith I. Honig American Enterprise Institute	https://www.aei.org/wp-content/uploads/2013/06/-from-tinkering-to-transformation-strengthening-school-district-central-office-performance_132121762693.pdf	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
Sample Communication Plan	National School Public Relations Association (NSPRA) Strategic Sample Communication Action Plan	http://www.nspr.org/research_in_progress	Culture/Climate/ Communication
A Comparison of Inclusion and Pullout Programs on Student Achievement for Students with Disabilities	James Matthew Hurt East Tennessee State University	http://dc.etsu.edu/cgi/viewcontent.cgi?article=2680&context=etd	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
Students with Disabilities Can Succeed! How the Baltimore City Public Schools Are Transforming Special Education	Kalman R. Hettleman The Abell Foundation October 2013	http://www.abell.org/sites/default/files/publications/ed-transspecial1013.pdf	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services

FResources	Description	Source	Recommendations
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Educating Students with Learning Disabilities in Inclusive Classrooms.	Jeremy Ford jwford@boisestate.edu	http://corescholar.libraries.wright.edu/cgi/viewcontent.cgi?article=1154&context=ejie	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
WestEd Evaluation Brief: Implementation and Outcomes of Kansas Multi-Tier System of Supports, 2011–2014	The evaluation found that Kansas MTSS is substantially contributing to improved student outcomes at the local level, as well as benefitting teachers, improving instruction, and supporting better school functioning.	http://www.wested.org/resources/evaluation-brief-kansas-multi-tier-system-of-supports/	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
WestEd Toolkit for a Workshop on Building a Culture of Data Use	This field-tested workshop toolkit guides facilitators through a set of structured activities to develop an understanding of how to foster a culture of data use in districts and schools	http://www.wested.org/resources/building-a-culture-of-data-use/	Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
Archived WestEd Webinar Bridging Standards, Assessment, and Instruction	In this webinar, two experienced educators explore how educators can use Smarter Balanced assessments to expand the scope of classroom literacy practices.	http://www.wested.org/resources/bridging-standards-assessment-and-instruction/	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System
Boosting The Quality and Efficiency of Special Education	Nathan Levenson, September 2012	http://files.eric.ed.gov/fulltext/ED534985.pdf	Aligned Systems Culture/Climate/Comm Professional Learning for A Coherent System Continuum of Services
Exploring the Pathway To Rapid District Improvement	Brett Lane for the Center on Innovation & Improvement	http://www.adi.org/about/downloads/Exploring_the_Pathway_to_Rapid_District_Improvement.pdf	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
A Million New Teachers Are Coming: Will They Be Ready To Teach	American Institutes for Research May 2015	http://educationpolicy.air.org/sites/default/files/Brief-MillionNewTeachers.pdf	Aligned Systems Professional Learning for A Coherent System
Understanding Student-Weighted Allocation as a Means to Greater School Resource Equity	Karen Hawley Miles- Education Resource Strategies Marguerite Roza - The Center on Reinventing Public Education University of Washington	http://edunomicslab.org/wp-content/uploads/2013/10/117.pdf	Aligned Systems Continuum of Services

WestED Data Collection	WestEd Data Collection Tools		Recommendations
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Document Checklist	WestEd generated list for document data collection.	The data collected was used for all recommendations.	Aligned Systems Culture/Climate Communication Professional Learning for A Coherent System Continuum of Services
Focus Group Interview Protocols	Focus group protocols for various groups: Teachers, Administrators, Specialized Program Staff, & Parents		
Individual Interview Protocols	Individual protocols for various administrative, certified, and educational support professionals staff		
Classroom Observation	Classroom observation tool to record observed instructional strategies and student engagement.		
State Complaint Checklist	WestEd generated a list of state complaints for data review.		
Jeffco Administrative Survey	WestEd developed a survey		
Jeffco Teacher Survey	WestEd developed a survey		



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