IMPROVING
SPECIAL EDUCATION SERVICES
In the
Detroit Public Schools Community District

Submitted to the Board of Education
of the
Detroit Public Schools Community District
by the
Strategic Support Team
of the
Council of the Great City Schools

Council of the Great City Schools™

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DPSCD's Response to Koby Levin's FOIA Request No. 1718-125, Doc. No. 0001

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The Council of the Great City Schools (Council) thanks the many individuals who contributed to this review of special education programs in the Detroit Public Schools Community District (DPSCD). Their efforts were critical to our ability to present the district with the best possible proposals for improving special education and related-services in the school system.

First, we thank Dr. Nikolai Vitti, the school district's superintendent. It is not easy to ask one's colleagues for the kind of reviews conducted by the Council's teams. Typically, our reports are very tough. It takes courage and openness to request them and a real desire for change and improvement. Dr. Vitti has these in abundance.

Second, we thank the DPSCD school board, which approved and supported this review. We hope this report meets your expectations and will help improve special education services across the school system.

Third, we thank district staff members who contributed to this effort, particularly Iranetta Wright, deputy superintendent of schools, and Michelle DeJaeger, senior executive director of specialized student services. They arranged the interviews and provided the detailed data and documents requested by the team. The time and effort required to organize a review such as this are extraordinary, and their work and support of all the staff was much appreciated.

Fourth, the Council thanks the many individuals who met with us, including central office administrators and personnel, principals, general and special educators, paraprofessionals and aides, related-services personnel, parents, and representatives from the Detroit Federation of Teachers and the Detroit Organization of School Administrators and Supervisors. They work passionately to support children with disabilities and ensure the school district serves these students in the best possible manner. District staff we met with were clearly dedicated to their students and showed a strong desire to improve student achievement.

Fifth, the Council thanks Dr. Gregory Roberson, chief of exceptional children with the Dayton Public Schools, and we thank his school system for allowing him to participate in this project. We also thank Dr. Judy Elliott, former chief academic officer for the Los Angeles Unified School District, who volunteered her time to participate in the site visit. Their contributions to this review were enormous, and their enthusiasm and generosity serve as further examples of how the nation's urban public-school systems are banding together to help each other improve outcomes for all urban students.

Finally, I thank Julie Wright Halbert, the Council's legislative counsel, who facilitated the work of the team prior to and during the team's site visit, and Sue Gamm, a nationally recognized expert in special education and a long-time consultant to the Council, who worked diligently with Ms. Halbert to prepare the final report. Their work was outstanding, as always, and critical to the success of this effort. Thank you.

Michael Casserly, Executive Director
Council of the Great City Schools

CHAPTER 1. PURPOSE AND ORIGIN OF THE PROJECT

Dr. Nikolai Vitti asked the Council to review DPSCD's services for students with disabilities and provide recommendations to support the teaching and learning of these students. It was clear to the Council's team that the superintendent and his staff have a strong desire to improve student outcomes. This report is designed to help DPSCD and its leaders achieve their goal and maximize the district's capacity to educate all students effectively.

The Work of the Strategic Support Team

To conduct its work, the Council assembled a team of experts who have successfully administered and operated special education programs in other major urban school districts across the country. These individuals also have firsthand expertise with the Individuals with Disabilities Education Act (IDEA) and are well versed in best practices in the administration and operation of special education programming.

The Council's Strategic Support Team (Council team) visited the district on January 8-10, 2018. During this period, the Council team conducted interviews and focus groups with district staff members and Michigan Department of Education personnel, Wayne County Regional Education Service Agency (RESA), parents and parent representatives, the Detroit Federation of Teachers, the Detroit Organization of School Administrators and Supervisors, and many others. (A list of those interviewed is presented in the appendices of this report.) In addition, the team reviewed numerous documents and reports, analyzed data, and developed initial recommendations and proposals before finalizing this report. (See the appendices for a list of documents reviewed.) On the final afternoon of its site visit, the team briefed the superintendent and deputy superintendent on the team's observations and preliminary recommendations.

This approach of providing technical assistance to urban school districts by using senior managers from other urban school systems is unique to the Council and its members. The organization finds it to be an effective approach for several reasons.

First, it allows the superintendent and staff members to work with a diverse set of talented, successful practitioners from around the country. The teams provide a pool of expertise that superintendents and staff can call on for advice as they implement the recommendations, face new challenges, and develop alternative solutions.

Second, the recommendations from urban school peers have power because the individuals who develop them have faced many of the same challenges encountered by the district requesting the review. No one can say that these individuals do not know what working in an urban school system is like or that their proposals have not been tested under the most rigorous conditions.

Third, using senior urban school managers from other urban school communities is less expensive than retaining large management consulting firms that may have little to no programmatic experience. The learning curve is rapid, and it would be difficult for any school system to buy on the open market the level of expertise offered by the Council's teams.

Members of the Strategic Support Team for this project included:

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Judy Elliot, Ph.D. Former Chief Academic Officer Los Angeles Unified School District	Sue Gamm, Esq. Former Chief Officer for Specialized Services Chicago Public Schools
Julie Wright Halbert, Esq. Legislative Counsel Council of the Great City Schools	Gregory Roberson, Ed.D. Chief, Office for Exceptional Children Dayton Public Schools

Methodology and Organization of Findings

The findings in this report are based on information from multiple sources, including documents provided by DPSCD and other organizations; electronic student data provided by DPSCD; group and individual interviews; documents; and legal sources, including federal and state requirements and guidance documents. No one is personally referred to or quoted in the report, although school district position titles are referenced when necessary for contextual purposes.

Chapter 2 of this report provides background information on the district. Chapter 3 presents an executive summary of the report. Chapter 4 is the Council team's findings and recommendations. These findings and recommendations focus specifically on areas that the superintendent and district leadership asked the Council's team to address. These include expanding equitable choices for students with disabilities, increasing their educational opportunities, improving appropriate identification, enhancing teaching and learning, and bolstering supports.

The findings and recommendations sections of the report, Chapter 4, contain a summary of relevant information, along with descriptions of the district's strengths, opportunities for improvement, and recommendations for change. The chapter is divided into four broad sections:

a) Multi-tiered System of Supports

b) Disability Demographics and Referral/Identification of Disability

c) Achievement of Students with Disabilities

d) Support for Teaching and Learning for Students with Disabilities

Chapter 5 lists all recommendations in one place for easy reference, and provides a matrix showing various components or features of the recommendations.

The appendices include the following information:

- Appendix A compares special education student incidence rates and staffing ratios in 75 major school systems across the country.
- Appendix B lists documents reviewed by the team
- Appendix C presents the team's working agenda for its site visit.
- Appendix D lists individuals the team interviewed individually or in groups.

- Appendix E presents brief biographical sketches of team members.
- Appendix F presents a description of the Council of the Great City Schools and a list of Strategic Support Teams that the organization has fielded over the last 20 years.

CHAPTER 2. BACKGROUND AND OVERVIEW

As the largest school district[1] in Michigan, measuring more than 1,390 square miles, the Detroit Public Schools Community District (DPSCD) enrolls 54,963 students, of which 9,980 (16.3 percent) have a disability. In addition, some 6,430 (12 percent) of the district's students are English learners (ELs). Of the EL students, 646 (10 percent) have a disability.

DPSCD students attend 108 schools, including 27 application schools, 6 schools attended solely by students with disabilities, and 7 career/technical centers and adult education schools.

It is not possible to describe the school district of today without taking into account the system's history and state oversight. In 1966, the enrollment of the Detroit Public Schools' (DPS) was at its peak with some 300,000 students. The district had expanded for nearly 125 years until the mid-to-late 1960s, but it began to decline precipitously when the city's automobile industry went into decline, court-mandated busing lead to substantial "white flight" to the suburbs, racial unrest ensued, the population declined, and public trust was eroded with reports of misspending of taxpayer dollars.

The spiral downward in enrollment and public confidence led, as it did in other cities at the time, to reduced school funding and disinvestment.[2] Finally, a series of reports, including by the Council of the Great City Schools, led to state intervention.

State Oversight of Detroit Public Schools

From 1999 through May 2017, the State of Michigan exercised control over DPS in all but about three years. During this period, there were four state appointed chief executive officers, four emergency managers, and one transition manager, none of whom were able to completely stabilize the school district or its finances.

Appointed School Board

In 1999, the Michigan legislature replaced DPS's elected school board with a seven-member "reform" board having six members appointed by the mayor and one selected by the state superintendent of public instruction. It also selected a new superintendent to manage the district. At the time of the reform board's installation, DPS had a modestly increasing enrollment, a $100 million positive fund balance, and $1.2 billion remaining from a series of bonds that voters approved five years earlier. By 2004, the surplus turned into a $200 million deficit, student achievement had improved somewhat, and voters by a two-to-one margin won back the right to have an elected school board.[3]

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[1] 2018 Largest School Districts in Michigan, retrieved from https://www.niche.com/k12/search/largest-school-districts/s/michigan/.

[2] Unless otherwise stated, information in this section was based on A School District in Crisis, Detroit's Public Schools (1842-2015), retrieved from https://makeloveland.com/reports/schools.

[3] The vote was authorized by a sunset clause in the state law, *After six years and four state-appointed managers, A Detroit Public Schools' debt has grown even deeper.* Curt Guyette. Feb 25-March 3, 2015, retrieved from https://www.metrotimes.com/detroit/after-six-years-and-four-state-appointed-managers-detroit-public-schools-debt-is-deeper-than-ever/Content?oid=2302010

Emergency Financial Management

The newly elected school board retained a new superintendent, but leadership was unable to turnaround the district's fortunes and audits showed the district's finances and operations in poor condition. Some three years later, in January 2009, the governor appointed the first emergency financial manager for DPS. At that point, an appointed board of education was reinstalled with little authority over the selection of a superintendent or the direction of district resources. Through five successive managers over a period of eight years, the district's enrollment plummeted further, and more than 60 schools were shuttered while the district's financial circumstance deteriorated. For students and district personnel at all levels, these circumstances created a climate of uncertainty and discontent, further undermining public confidence.

The following data track some of the most recent circumstances.

- When in March 2009 the first emergency financial manager took office, DPS had 172 schools, 85,000 students, and a $219 million deficit.[4]
- By the end of the manager's two-year term, the deficit had grown to over $284 million dollars, 59 schools had closed, and the district had lost over 20,000 students.[5]
- By the end of 2013-14, DPS's deficit had increased by almost $550 million to $763.7 million.
- By January 2016, DPS's total debt topped $3.5 billion (from $1.5 billion in 2007-08).[6]
- By 2015, DPS enrollment had fallen from March 2009 by nearly 43 percent to 48,900 students.[7]

Exacerbating the district's circumstances were changes in state funding; the initiation of the Education Achievement Authority; the growth of school choice (charter schools and schools of choice outside of DPS); and fiscal shortfalls related to personnel shortages.

State Funding

In 1994, there was a statewide referendum that shifted Michigan's educational funding from its primary reliance on local property taxes to a "per pupil" foundation grant provided by the state. The loss of student enrollment and lower school funding for the city school system resulted in lost revenue that would no longer be available to pay for DPS's recent construction and modernization activities.

Education Achievement Authority (EAA)

In September 2011, the state's new EEA took over 15 DPS schools that enrolled some 11,000 students. By 2016, just under 6,000 students were enrolled in EEA schools, which served a smaller proportion of students with disabilities than did DPS. EAA teachers were not unionized,

[4] After six years and four state-appointed managers, Detroit Public Schools' debt has grown even deeper. *Ibid*.
[5] A School District in Crisis, Detroit's Public Schools (1842-2015), retrieved from https://makeloveland.com/reports/schools.
[6] Metro Times. February 25, 2015; Detroit Free Press, retrieved from https://www.freep.com/story/news/local/michigan/detroit/2016/01/06/dps-debt/78314708/.
[7] After six years and four state-appointed managers, Detroit Public Schools' debt has grown even deeper. *Ibid*.

they received higher salaries than DPS teachers, and they did not pay into the state's school employee retirement system. When the EAA was disbanded in Detroit, 12 schools transferred back to the district's control and three converted into charter schools.[8]

School Choice

In addition to attending DPS, Detroit students have the choice of attending a charter school in the city, or a charter or other public school outside the city.

Charter Schools

Beginning in 1994, with Michigan's authorization of charter schools, charter growth in Detroit aligned with DPS's decline in district public schools.[9] The initiative began with 14 charter schools in 1995 and six years later over 19,000 students attended charter schools in Detroit. The city's charter sector expanded rapidly under DPS's first emergency financial manager, [10] and charter operators began to expand offerings to attract DPS students, advertising heavily in areas where district schools had closed. Between 2010 and 2013, 32 new charter schools opened, representing a 42 percent increase in just three years and bringing the total number of charter schools to 109. Nearly half (47) of Detroit's charter schools are now located in former DPS buildings, all of which were sold or leased between 2000 and 2015. With more than 51,000 students, charter school enrollment in Detroit is about the same as the district's current 54,000 student enrollment.

DPS Authorization of Charter Schools

As the oldest authorizer in Michigan, DPS chartered its first schools in 1995 and currently authorizes 13 academies on 18 sites, educating about 4,200 students. The district monitors these schools to ensure they are financially sound, meet their academic goals, and follow state and federal requirements.

Schools of Choice

Michigan was also at the forefront of school choice efforts during this period, passing legislation that allowed students to attend school districts outside of the one in which they resided. These 'receiving schools' garnered the originating district's per-pupil funding. In 2011 alone (the second year of emergency financial management), DPS lost 7,856 students or about 10 percent of its total enrollment to other school districts. By 2015, more than 25,000 students attended public and charter schools in locations outside of Detroit.

Implications for Students Receiving Special Education

Students with disabilities were significantly less likely than their typically developing peers to take advantage of school choice options and were more likely to attend Detroit's traditional

[8] A School District in Crisis, *Ibid*.
[9] Unless otherwise stated, the information in this section is based on A School District in Crisis, Detroit's Public Schools. *Ibid*.
[10] The Robert Bobb Legacy: Detroit schools still struggling as emergency manager exits. Retrieved from http://www.mlive.com/news/detroit/index.ssf/2011/05/robert_bobbs_legacy_detroit_sc.html.

public schools. In 2015, 18 percent of DPS students had an individualized education program (IEP), compared to 10 percent of charter school students. This disparity has been explained as a function of Detroit's charter schools not having the special education supports in place to serve these students.[11]

Charter Coordination in Detroit

As measured by percentage of total enrollment, Detroit has the third-largest charter sector in the country after New Orleans and Washington, D.C.[12] However, the number of charters and the diversity of authorizers has not resulted in a coherent educational system for the city, according to some. "Contributing to Detroit's problems is a tangled web of a dozen authorizers that determine where charter schools can open or close. Many of those authorizers are public universities and community colleges that often don't work together to plan comprehensively, which can create chaotic situations in some neighborhoods."[13] Adding to this fragmentation is the frequent opening and closing of schools. Reportedly, 80 percent of DPS's public and charter schools have opened or closed between 2010 and 2016.

Personnel Shortages

Because of DPS's severe financial circumstances and to avoid personnel layoffs proposed by the emergency financial manager in 2010, the Detroit Federation of Teachers (DFT) agreed that teachers would loan some $9,000 each to the district, which would be repaid at the time they left the district. Two years later, teachers received a 10 percent wage cut and were required to begin paying for 20 percent of their health care benefits. Retirements, job uncertainties, budget cuts, stagnant and noncompetitive wages, and personnel layoffs fueled significant teacher shortages, leaving some schools understaffed.

Detroit Public Schools Community District

In July 2016, the state terminated the district's emergency financial management and the Education Achievement Authority and created the Detroit Public Schools Community District (DPSCD) that would be governed by an elected school board working with the state-appointed Detroit Financial Review Commission. DPSCD avoided insolvency with a $617 million legislative package that resolved the district's debt. The legacy district—DPS—remained as a revenue-collection entity to pay down the system's $515 million in operating debt and DPSCD was instituted to operate the district and serve the city's children. The new DPSCD board of education was off to a fresh start and hired district superintendent Nikolai Vitti in May 2017, who had a strong track record of improving student outcomes in the Duval County (FL) school system. Still, the new superintendent had to inform the school board in December 2017 that the district would not receive $6.5 million in state funds to reduce old debt, because district officials had failed to submit required paperwork by an August 15th deadline.

[11] Fixing Detroit's Broken School System. Education Next. Robin J. Lake, Ashley Jochim and Michael DeArmond. Winter 2015, retrieved from http://educationnext.org/fixing-detroits-broken-school-system/.
[12]Drawing Detroit, Michigan's charter schools concentrated in Detroit, July 13, 2015, retrieved from http://www.drawingdetroit.com/michigans-charter-schools-concentrated-in-detroit/
[13] Inside Detroit's Radical Experiment to Save Its Public Schools. Josh Sanburn. September 6, 2016. retrieved from http://time.com/4390000/detroit-public-schools-charters-debt/.

Personnel shortages, as well, continued to plague the new DPSCD, especially as the new system acquired the 12 EAA schools. Only about 50 percent of the EAA teachers reapplied for positions with DPSCD, as many of them had received higher salaries than DPS offered. In August 2017, 340 teacher vacancies existed, compared to 200 in August 2016. Of these 340 vacant positions, 85 were in former EAA schools.[14] Furthermore, 97 of the vacancies were among special education teachers. In July 2017, the district and DFT agreed to a seven percent salary increase over two years. However, health insurance options continued to have high deductibles and there was a longer length of time necessary to reach the top of the salary schedule. Still, teachers received a $1,750 bonus at the beginning of 2017-18 school year to help stabilize the system.

Hope for the Future

Despite the many challenges facing the district, there are now many signs of promise for a brighter future.

- The Council team was impressed by the many focus group participants who spoke about opportunities they have to work and receive higher salaries in neighboring school districts, but who have chosen to remain with DPSCD because of their loyalty to their students and the community. We salute these individuals for their commitment and perseverance.
- The new superintendent has a strong appreciation of the challenges facing students with disabilities and he recognizes that he is their first and foremost advocate. Parents and community advocates appreciated the August 2017 town hall meeting, which focused on special education and included the superintendent and his wife, Rachel Vitti.
- The deputy superintendent of schools has an understanding of instruction and the academic implications of special education.
- The executive director of curriculum and instruction has a strong vision of multi-tiered systems of supports and the alignment of core curriculum to high standards.
- Parents remarked that principals and the new special education senior executive director have been more responsive than personnel in the past.
- The special education senior executive director has a strong vision of special education, the need for inclusivity, and the need for a paradigm shift to support instruction and supports for students.
- The involvement of Dr. Eleanor Harris, former state official and Education Achievement Authority special education director, is an invaluable resource to the district as a consultant to the senior executive director.
- There is strong parental and community commitment to being valuable partners in the change process.

[14] Teacher shortage looms over Detroit. Jennifer Chambers and Mark Hicks. Detroit News. August 21, 2017. Retrieved from http://www.detroitnews.com/story/news/local/detroit-city/2017/08/21/detroit-schools-faces-teacher-shortage/104838298/.

CHAPTER 3. EXECUTIVE SUMMARY

The Detroit Public Schools Community District asked the Council of the Great City Schools to review the district's special education programs and to make recommendations on how to improve services for students with disabilities. To conduct its work, the Council assembled a team of special education experts with strong reputations for improving services in their own districts. The Council team visited Detroit in January, conducted numerous interviews, reviewed documents, and analyzed data. At the end of the visit, the team formulated and presented preliminary observations and recommendations.

The Council has reviewed numerous special education programs in big city schools across the country, and the organization is not always able to point out positive features of each school district's work with students with disabilities. In this case, however, the DPSCD has several things it can be proud of and assets it can use to build more effective services for students with disabilities going forward. For instance, the district has a strong new superintendent who is determined to improve the school system after years of state control.

In addition, the district completes some 99.8 percent of its initial evaluations on time and most IEPs are completed in a timely fashion. There are problems implementing the IEPs, but the district can complete them on time. Also, the district's resource coordinating teams (RCTs) are a good model and are used for collaborative problem solving. They are unevenly used from school-to-school, but the model is an excellent one if it can be used more universally.

Moreover, the district has a relatively high special education identification rate, but there were no substantial areas of disproportionality by race alone. There were circumstances, however, where one race or another had higher identification rates depending on disability area. For instance, African American students appeared to be at higher risk of being identified for a cognitive impairment and white students appeared at higher risk of being identified for an emotional impairment. In addition, there did not appear to be substantial disproportionality in the suspension of students with disabilities, although it was not always clear that suspension data were accurate.

Even though students systemwide have very low scores on the National Assessment of Educational Progress (NAEP), there was some evidence that students with disabilities in Detroit had made progress over the last several years. In addition, there was solid evidence that the dropout rate among students with disabilities had declined appreciably, 14.9 percent to 7.7 percent.

The district also has more time for professional development than the Council's team sometimes sees in other urban school systems it reviews. The time is often judged as inadequate by staff given the level of need in the district, but the system has more such time than most. There is also evidence of the use of RTI and PBIS programs in the district, although they are very unevenly implemented. Moreover, the district claims some $6.0 in Medicaid reimbursements, although the amount could be higher if its claiming system were automated. The system is also working on a stronger accountability system. And the school district has strong and committed parents who want to see the system get better and are willing to do everything they can for its students with disabilities.

At the same time, the district has substantial problems. It does have a higher rate of students identified for special education services, but it appears that part of this problem is attributable to the differing rates at which charter schools serve students with disabilities depending on the severity of the need. There are also substantial data problems that the Council team encountered. These were particularly prominent in assessing progress among early childhood pupils and gauging the prevalence of out-of-school suspensions.

The instructional system also reflected challenges. Overall, the Tier I instructional system was weak. The new superintendent has placed new emphasis on strengthening it, but there is still considerable work to do. Moreover, the school district's interventions were poorly defined, were not regularly used, and training on them was uneven. There was no written MTSS framework and no general use of UDL principles to guide the instructional work. In addition, there was no systemic use of co-teaching as an instructional approach with students with disabilities. And once English learners were placed in special education, their language acquisition needs were largely unaddressed. The combination of these factors alone are more than enough to explain the low proficiency rates among students with disabilities in the district.

Information gathered by the Council team also pointed to the fact that students with disabilities were educated outside of the general education setting at much higher rates than was the case in Wayne RESA, the state, or the nation. Students with disabilities were more segregated from their non-disabled peers than is typically the case. Furthermore, uneven distribution of programs for these students from school-to-school disproportionately impacts schools with high disability rates.

The district was also having problems with staff shortages, partly due to untimely hiring practices, and numerous vacancies that had to be filled sometimes at the last minute with staff who were not fully qualified. Professional development was not well-defined around special education issues for either general education teachers or others. And the organizational structure of the special education unit and some lingering problems with staff relations added to the challenges that the district was facing. Finally, the district has several compliance issues that it will need to attend to.

The Council has put forward numerous recommendations to begin addressing the issues the district faces in serving students with disabilities. The district does not have to address all of them in the way presented in this report, but the team is most eager to point DCPSD officials to other big city school systems who have successfully addressed some of the same issues. The Council knows that the area of special education is only one of several challenges that the school district is facing. It has been a considerable length of time since the district has turned its attention to solving programmatic problems as it was sorting out its financial ones. The public should know that it is going to take the district's leadership some time to handle all the unmet needs that the city's children have. But the Council of the Great City Schools stands ready to help the district and its leadership in any way the district thinks constructive.

CHAPTER 4. FINDINGS AND RECOMMENDATIONS

This chapter presents the Council team's findings in four areas described in Chapter 1: multi-tiered systems of support, demographics and identification, academic achievement among students with disabilities, and teaching and learning. Each section includes a summary of the team's findings and concludes with overall strengths, opportunities for improvement, and recommendations.

I. Multi-Tiered Systems of Support

A multi-tiered system of supports (MTSS) involves the systematic use of multi-source assessment data to efficiently allocate resources and improve learning for all students through a series of integrated academic and behavioral supports.[15]As described in the Council of the Great City Schools' report, *Common Core State Standards and Diverse Urban Students*,[16] MTSS is designed to improve educational outcomes for all students. It focuses on prevention and early identification of students who might benefit from instructional or behavioral interventions. The framework is a merger of response to intervention (RTI), which typically focuses on academic achievement, and systems to improve positive student behavior. When the term MTSS is used in this report, it includes RTI, Positive Behavior Intervention and Supports (PBIS), or other systems for supporting positive student behavior. It also applies to gifted students.

As described in the CGCS report, the essential components of an MTSS framework include:

- Well-defined district- and school-based leadership and organizational structure;
- District policies and practices that align with and support a multi-tiered system;
- Technology sufficient to support instructional decision making and implementation of instruction (e.g., Universal Design for Learning or UDL);
- Robust and valid core or Tier I instruction delivered to all students;
- Assessment of expected rates of progress;
- The use of three tiers of increasingly intensive (time and focus of instruction) instructional supports and strategies;
- Professional development to ensure fidelity of implementation of MTSS methodology and the Common Core State Standards;
- An evaluation process that monitors both implementation and outcomes; and
- The engagement of parents and caregivers.

In a functioning MTSS framework, schools have systems in place to identify the needs of all students and monitor and evaluate progress throughout the school year, using multiple data

[15] Florida's Multi-tiered System of Supports, retrieved from http://florida-rti.org/floridaMTSS/mtf.htm.
[16]Retrieved from https://www.cgcs.org/cms/lib/DC00001581/Centricity/Domain/87/77--Achievement%20Task%20Force--RTI%20White%20Paper-Final.pdf.

measures (e.g., district assessments, attendance, suspensions, grades, numbers of office referrals, etc.). Data are analyzed, and differentiated instruction and intervention are delivered based on results. Teachers and leaders regularly review and monitor student progress to determine trends and identify instructional adjustments needed for remediation, intervention, and acceleration.

When a student fails to make adequate progress when robust core or Tier I instruction has been delivered, then instructional interventions are put into place and their effects are tracked. Without this monitoring system in place, it is unlikely that schools will have the documentation needed to determine whether underachievement is due to ineffective core instruction and interventions or something else that might trigger a special education referral. Nevertheless, when teachers and parents observe students who are struggling to learn and behave appropriately, there is a predictable desire to seek legally protected special education services.

To make this system work, it is imperative that districts and schools have processes in place to help educators determine why a student is not performing or when they might need acceleration. When implemented as intended, an MTSS framework focuses on rigorous core instruction and provides strategic and targeted interventions without regard to disability status. In addition, MTSS can lead to better student engagement and lowered disciplinary referrals—and fewer students requiring special education services. It can also help reduce disproportionate placements of students from various racial/ethnic groups and those with developing levels of English proficiency who might otherwise fall into the ranks of those needing special education services.

In fact, MTSS is recognized in the *Every Student Succeeds Act* (ESSA)[17] as an appropriate framework for supporting student achievement and positive behavior, and it is a permissible use of federal Title I funds. The Act defines MTSS as "a comprehensive continuum of evidence-based, systemic practices to support a rapid response to students' needs, with regular observation to facilitate data-based instructional decision-making."

The subsections below describe the Michigan Department of Education's (MDE) and Wayne Regional Education Service Agency's (RESA) support for and guidance on MTSS. They also address the extent to which DPSCD has implemented this framework to support student achievement/positive student behaviors and guide strategies, including referrals for special education, when student progress is not evident.

Michigan Guidance for MTSS

According to MDE, schools that have implemented tiered models of instruction have higher proficiency rates than those that do not. In addition, schools that have implemented tiered intervention with fidelity have a higher percentage of students who are academically proficient than schools that do not implement it well. In fact, the performance gap widened over the three-year period encompassing MDE's analysis of schools implementing MTSS with and without fidelity.[18]

[17] The Elementary and Secondary Education Act was reauthorized in 2015 as the Every Student Succeeds Act (ESSA).

[18] Fidelity, based on the Planning and Evaluation Tool for Effective Schoolwide Reading Programs-revised (PET-R). The PET-R is used by a school's leadership team to rate their school's current reading program implementation and to identify reading goals and priorities. This self-assessment tool addresses seven elements of an effective

MTSS is the cornerstone of MDE's 'Top 10 in 10 Strategic Plan,' and its special education State Systemic Improvement Plan. This work builds on MDE's earlier backing for response to intervention (RtI), positive behavior supports (PBIS), and Michigan's Integrated Behavior and Learning Support Initiative.

Top 10 in 10 Strategic Plan

MDE's Top 10 in 10 Strategic Plan[19] (top 10 state in education in 10 years) uses MTSS as its driver for better student outcomes. Accordingly, MDE has aligned all state and federal plans to lift student achievement. In interviews with the Council team, the department indicated that it selected MTSS to frame MDE activities because it sees the positive effects of the approach and because the field is using many versions of the practice. Furthermore, MDE believes that utilizing the MTSS framework will support effective implementation of the Top 10 in 10 Strategic Plan, particularly those components contained in the Learner Centered Supports Focus Area. MDE has pursued stakeholder feedback and tested usability during the 2017-18 school year in collaboration with school districts in the state's Transformation Zone, which does not include DPSCD. The state reports promising results.

State (Special Education) Systemic Improvement Plan (SSIP)

As part of its results-driven accountability system for special education, the U.S. Department of Education requires that each state develop and implement by 2018-19 a State Systemic Improvement Plan (SSIP) to improve educational outcomes for students with disabilities. MDE has embedded MTSS into its SSIP process, viewing this strategy as an opportunity for the state to reorient its work around supporting local capacity to improve outcomes for *all* students. Although SSIP is a special education requirement, MDE is embedding it into its Top 10 in 10 Focus Area Framework. This enables MDE to use the SSIP framework to articulate a comprehensive, six-year plan for coordinating resources and aligning initiatives across the department to focus improvement at all levels of the system.[20]

Michigan's Integrated Behavior and Learning Support Initiative

The state is also building on the Michigan Integrated Behavior and Learning Support Initiative (MIBLSI) that was funded by an IDEA grant to MDE.[21] MIBLSI was designed to help intermediate and local school districts implement and sustain MTSS to improve student outcomes in behavior and learning. The MIBLSI webpage offers a plethora of high quality information and training resources on:

- ***MTSS practices*** and related supports for reading and behavior at the three tiers of support.
- ***Data-based decision making*** using data collected at the district, school, and student levels,

school-wide reading program, including: Goals and Objectives, Assessment, Instructional Practices, Instructional Time, Differentiated Instruction, Administration, and Professional Development. Retrieved from apr-2013b-mi-indicator17-compiled-with-appendices-biblio-bkmrks-phasei.pdf and from https://dibels.uoregon.edu/docs/pet_r_form_user.pdf.

[19] Retrieved from http://www.michigan.gov/mde/0,4615,7-140-28753_65803-322534--,00.html.

[20] Retrieved from apr-2013b-mi-indicator17-compiled-with-appendices-biblio-bkmrks-phasei.pdf.

[21] Retrieved from https://miblsi.org/.

including a MIBLSI data base with dashboards and reports.

- ***Student assessments*** to determine which students need additional supports and when schoolwide supports need to be adjusted, including universal screening, progress monitoring, diagnostic and summative assessments, and early warning indicators. Also, included are:
  - A student risk screening scale;
  - A school climate survey, and a schoolwide information system for screening and monitoring student behavior;
  - Fidelity assessments for MTSS practices related to behavior and reading;
  - Capacity assessments to determine if the district can effectively support schools.
  - Reach assessments to identify implementation stages on--
    - How many schools are implementing MTSS to support students.
    - How far along schools are in providing supports to students.
  - Data analyses to help school teams problem solve by understanding what the data mean and how to use it to positively impact students.
- ***Teams and roles*** for cross-functional teams.

Twenty-two DPS schools engaged with the MIBLSI initiative during the 2012-13 school year. Various focus group participants reported that their schools continued to be engaged with MIPLSI practices, including using universal screening and progress monitoring tools.

Response to Intervention and Positive Behavior Intervention and Supports (PBIS)

The state's approach to MTSS is likely to continue building on its prior guidance and resources for response to intervention (RtI) and positive behavior intervention and supports (PBIS). In September 8, 2011, MDE provided RtI guidance materials to local and intermediate school district (ISD) superintendents and principals.[22] The documents provided a description of essential components of Michigan's RtI framework and indicated that additional guidance materials and resource-based links would be forthcoming. The agency's support for PBIS appears to be considerably more developed now as evidenced by its webpage and related links.[23] There, multiple topics are addressed, including an overview of PBIS, implementation activities, research, and resources.

Wayne RESA Guidance

Wayne RESA also has a webpage devoted to MTSS/RtI and to PBIS.[24] The MTSS Quick Guide provides worthwhile information on district, building, and classroom practices; working with data; and coordinating and planning activities. It also contains field guides on Tier II and III literacy interventions, as well as guidance on mathematics.[25] The PBIS webpage describes

[22] Retrieved from https://www.michigan.gov/documents/mde/Response_to_Intervention_362712_7.pdf.
[23] Retrieved from http://www.michigan.gov/mde/0,4615,7-140-74638_72831_72833-361319--,00.html#one.
[24] MTSS/RtI retrieved from http://www.resa.net/specialeducation/rti/, and PBIS is retrieved from http://www.resa.net/curriculum/schoolwide-positive-behavioral-interventions-supports/.
[25] Retrieved from http://www.resa.net/curriculum/curriculum/math/mtss-mathematics/.

administrative supports at the building and district levels, and information on engaging parents. It also includes training opportunities on interventions at each tier and alternatives to suspension, along with Wayne RESA resources, videos, links, PBIS presentations, and forums for 2017-18.

Detroit Public Schools[26] Prior Guidance and Practices

The Detroit Public Schools (DPS) initiated multi-tiered interventions of support for academics and behavior in 2009 with its excellent RtI Handbook and RtI Toolkit.[27] While the district provided to the Council team an electronic copy of the RtI Handbook, we found the RtI Tool Kit through a general Google search. However, it does not appear that practices reflected in these two documents have been widespread throughout the district, according to those interviewed by the team. Both tools are worth re-examining.

RtI Handbook

The RtI Handbook, which was developed by DPS's school psychologists, describes the problem-solving model for reviewing and analyzing student data. It also looks at the provision of interventions at each of three tiered levels. Moreover, the document proposed a plan for DPS's implementation of RtI with parameters at each of the intervention levels. Also included were:

- Student case studies; and
- Sample forms and parent information letters, including a sample Tier II intervention monitoring log; CBM/progress monitoring data recording sheets; a psychological report template using RtI data to determine specific learning disabilities; a classroom observation form; qualitative and quantifiable data; and information on English language learners.

Resource Coordinating Team

The RtI Handbook also described a resource coordinating team (RCT) model, a researched-based student support program developed by the University of California at Los Angeles (UCLA) School Mental Health Project. As a problem-solving team, an RCT is meant to coordinate services in order to remove learning and achievement barriers at the school, classroom, and student levels. When implemented as intended, the RCT operates and functions easily within an RtI framework.

According to information DPSCD provided to the Council team, the RCTs, which are still used in the district:

- Coordinate, and integrate services and programs that address underlying problems and barriers to learning, and facilitate understanding, prevention, and correction;
- Assist in structuring individual and school-based intervention plans that respond to student,

[26] The district's name as the "Detroit Public Schools" refers to DPS prior to the 2017-18 school year when it was reconstituted as DPSCD.
[27] The RtI Handbook was retrieved from http://detroitk12.org/admin/academic_affairs/special_education/clinical_prevention_intervention_services/docs/RtIHandbook.pdf; and the RtI Toolkit was retrieved from http://detroitk12.org/admin/academic_affairs/special_education/clinical_prevention_intervention_services/docs/InterventionToolkit.pdf.

staff and family needs; and

- Advocate for proactive involvement and timely responses to staff, students, parents/families, community, and others

Individuals in the school community (i.e., teachers, administrators, parents, and students) may refer students to the RCT by completing an RCT referral form or parents may contact a school administrator to request an RCT meeting. Members of the RCT may include principals/designees, classroom teachers, and support personnel (psychologists, social workers, speech/ language impaired teachers, nurses, guidance counselor, attendance agent, etc.).

The RCT process is based on three levels of problem solving that align with the three tiers of increasingly intensive interventions described in the MTSS literature. During the most intensive level of interventions (i.e., Tier III), if it is determined that students are not progressing, and additional resources and services are needed, the RCT may consider referring the student for an evaluation under either Section 504 or special education.

RtI Tool Kit

In addition to the RtI Handbook, DPSCD's psychological services published an Intervention Tool Kit for School Psychologists (Working Within the RtI Framework). Its goals were to provide school psychologists with a list of interventions to assist them in the appropriate selection, implementation, and monitoring of intervention services for students who need them. The document is intended as a guide for translating the RtI model into a workable framework for DPSCD use.

The RtI Tool Kit provides a sample of research-based and teacher-applied techniques to increase student achievement and enhance positive behaviors. In addition, it describes how to collect, analyze, and interpret data on making special education eligibility recommendations within the RtI model. Interventions are provided to address:

- Fluency (letter naming, word study, oral reading);
- Vocabulary and reading comprehension;
- Math computation and concepts;
- Spelling and written expression;
- Behavior;
- Autism spectrum disorder (ASD); and
- Attention deficit/hyperactivity disorder (ADHD).

The RtI Tool Kit provides samples of the following: (a) psychological reports for intensive interventions and special education eligibility using RtI; (b) DIBELs oral-reading fluency materials; (c) a problem-identification interview form; (c) a procedure for self-monitoring behavioral interventions; (d) discrete trials with beginning, middle, and end; (e) question and response chart on the function of objects for ASD diagnosis; (f) social stories/pictures for social skills instruction for ASD; (g) guidance on transforming negative to positive statements to help

increase positive interactions; (h) a weekly organizational chart of interventions for students with ADHD; and (i) an intervention for teaching desired behaviors to students with ADHD.

The Tool Kit is a good foundation for school psychologists, but it would benefit from additional information on specific elementary, middle, and high school grade levels. It also provides a good foundation for school staff members other than school psychologists.

Focus Group Feedback

Focus group participants provided the following feedback on their use of a multi-tiered system of supports in the district.

- ***Leadership.*** The senior executive director for curriculum and instruction is knowledgeable and experienced in implementing MTSS and understands what needs to be done to develop a framework for the 2018-19 school year, according to interviewees.
- ***Familiarity with Tiered Supports/Instruction.*** While many focus group participants were not familiar with the term "MTSS," they were more familiar with the terms RtI, PBIS, and MIBLSI. Generally, it appears that some schools have received professional development and support from Wayne RESA on PBIS or MIBLSI. However, the district lacked an operational and comprehensive MTSS framework.
- ***Improving Core Curriculum Instruction.*** There is a new emphasis in the district on supporting teachers in improving the quality of "first teaching" (i.e., Tier I). Master scheduling guidelines for teachers is now in development, and principals are engaging in "data chats." Still, there are no plans to embed universal design for learning (UDL) practices in the curriculum framework or its implementation.[28]
- ***Master Teacher Initiative.*** Intensive training will be provided to 52 teachers (26 math and 26 ELA) to support school-based instruction. Although student behavior is frequently cited as interfering with instruction, there was not systemwide professional development on this issue that interviewees knew about. With only three behavioral interventionists in the district, it is necessary for many more individuals to develop their own expertise to support positive student behaviors and social/emotional development. The team noted that the district's master teacher initiative had not been designed to include special educators, bilingual teachers, or teachers of gifted students.
- ***IReady/MiBLSi.*** IReady, an adaptive reading and math diagnostic data tool with reports and instructional supports, is in place for grades kindergarten through three and will expand next year to grade eight. MIBLSI's data collection and reporting system also continues to be used by some schools. Overall, data are inconsistently used by school personnel to drive discussions about instruction.
- ***Intervention.*** Few interviewees described the use of specific interventions even though the

[28] UDL is defined as "a scientifically valid framework for guiding educational practice that (a) provides flexibility in the ways information is presented, in the ways students respond or demonstrate knowledge and skills, and in the ways students are engaged; and (b) reduces barriers in instruction, provides appropriate accommodations, supports, and challenges, and maintains high achievement expectations for all students, including students with disabilities and students who are limited English proficient." by Higher Education Opportunity Act (PL 110-135). See the National Center on Universal Design for Learning at http://www.udlcenter.org/.

team was told that elementary-level students who have not reached reading proficiency have a reading plan. Other than Voyager, which is used for students in some special education programs, participants did not mention any other intervention universally in place across the district.

- ***Wayne RESA Support.*** The number of schools working with Wayne RESA grew from 9 to 42 between 2011-12 and 2016-17. This school year, the PBIS initiative associated with Wayne RESA and MIBLSI is no longer under the special education department but is supported by the department's four behavioral specialists. The Culture and Climate unit, which now houses the PBIS initiative, does not employ behavioral specialists or other coaches and there is concern about access to personnel with sufficient expertise to continue supporting schools. In the past behavioral specialists were available to coach teachers, support data analysis, and facilitate school reviews of PBIS practices using a School-Wide Evaluation Tool (SET). This school year, interviewees reported that communications between Wayne RESA and schools engaged in PBIS had diminished.
- ***Use of RCT Process.*** There is no written requirement in the district that each school have an RCT with practices consistent with the RtI Handbook. Although the process is available to initiate a Section 504 or special education evaluation, every school does not consistently use RCTs for problem-solving or for following up on a student's low achievement or challenging behaviors. Interviewees reported that the RCT process is more successful when the school principal actively participates and sets expectations for school personnel. When principals are uninvolved, the process is not likely to be effective. Because of personnel vacancies and other reasons, some schools reported having as many as 25 students waiting for RCT review.
- ***English Learners.*** There was a desire among interviewees to have more information on and resources to better support English learners through an MTSS framework.
- ***Age Six School Enrollment.*** Michigan students are not required by law to enroll in school for the first time until they are six years of age. There were concerns by focus-group participants that skill deficits related to late enrollment may be leading to special education referrals without interventions that might otherwise address their achievement gaps.

Blueprint 2020

Blueprint 2020 is DPSCD's new strategic plan for rebuilding Detroit's public schools and fulfilling the district's mission to educate and empower every student, in every community, every day, to build a stronger Detroit.[29] The district's vision is for all students to have the knowledge, skills, and confidence necessary to thrive in the city, nation, and world. A "students first" focus in the blueprint is designed to drive decisions that are in students' best interests, and to use resources strategically to meet individual student needs.

The strategic plan's priorities and commitments are described below. Blueprint 2020 is an excellent plan, but it does not mention the development and use of an MTSS framework as a

[29] Retrieved from http://detroit.k12.mi.us/admin/communications/strategic_plan/docs/Blueprint_2020_Strategies_Only.pdf

component of its approach. However, as noted in the italicized text below, the framework is sufficiently inclusive to be incorporated into the plan's components.[30]

- **Outstanding Achievement.** Dramatically improve the academic experience of all students to ensure they are college and career ready by –
  - *Adopting and implementing a highly aligned, consistent instructional curriculum reflecting demands of Michigan's core content standards PreK through 12, as well as the pedagogical shifts in instruction required to support students in meeting these high standards.*
  - *Ensuring every student has access to a rigorous course progression that aligns with their college, career and life goals while being culturally relevant.*
  - *Updating data and assessment systems to ensure all stakeholders have an accurate picture of each student's progress toward grade level expectations and on time graduation.*
  - *Revamping special education services to meet the individual needs of each student.*
  - *Providing intensive support to improve the achievement of our students attending Partnership Schools.*
- **Transformative Culture.** Transform the culture so students, families, community members, and staff feel safe, respected and connected by –
  - *Gathering, sharing and acting on feedback from students, staff, and families on the culture of schools and district.*
  - *Establishing and consistently implementing a code of conduct that encourages positive behavior, maximizes instructional time for all students, and allows for restorative justice.*
  - *Cultivating a school-going culture that dramatically reduces chronic absenteeism.*
  - *Developing and providing, in partnership with community allies, comprehensive supports and resources that empower students' families.*
  - *Building and implementing shared decision-making structures to ensure work of schools and district meets needs of constituents.*
  - *Implementing consistent communication channels to keep all stakeholders informed about district operations, strategic direction, programs and opportunities, and progress.*
- **Whole Child Commitment.** Champion a whole child approach that unlocks students' full potential by –
  - *Based on students' individual needs, facilitating and aligning appropriate academic, cultural, and leadership experiences, as well as social-emotional and health services, to promote holistic well-being and development of students.*
  - *Ensuring all students have access to robust programming in non-core subject areas, including visual arts, music, dance, theater, physical education, world language, technology and health, as well as service-based learning opportunities.*

[30] As noted earlier in this report, MTSS is a component of MDE's strategic plan to become a "Top 10 state in education in 10 years."

  - *Expanding access to and participation in high-quality activities outside of the school day, including before and after school programs and summer experiences.*
  - Supporting students' health, development, and learning by providing high-quality, nutritious meals at schools.

- **Talent.** Build an excellent team of dedicated staff to serve DPSCD students by –
  - Overhauling human capital policies/practices to make recruitment, hiring and onboarding more efficient and effective.
  - Pursuing innovative partnerships/programs that strengthen talent pipelines into open school/district positions.
  - Ensuring all staff have the professional development they need to support students and maximize the efficiency and effectiveness of the district.
  - Developing/implementing educator and staff evaluation, and succession planning systems that support individual growth, allow top employees to pursue advancement within the organization, and improve candidate pools for leadership vacancies.
- ***Responsible Stewardship.*** Manage/deploy resources responsibly, transparently, and equitably to support student success by –
  - Overhauling district/school budgeting processes to ensure a balanced budget that is aligned to district strategic priorities.
  - Developing/implementing a facilities management and technology infrastructure plan that accounts for current/future needs and identifies funding strategies to support maintenance and improvement.
  - *Establishing and consistently implementing a clear set of standard operating procedures and routines across schools and district departments that exemplify our values, maximize resources and efficiency.*
  - *Aligning district, community, philanthropic and city partnerships to ensure coherent programming and smart development.*
  - *Ensuring systematic research/evaluation plans for all major initiatives so investments can be made based on program effectiveness.*

AREAS OF STRENGTH

The following are areas of strength related to the district's support for teaching and learning for students with disabilities and others.

- ***Leadership.*** The senior executive director for curriculum and instruction has knowledge of and experience in implementing MTSS and understands what needs to be done to develop a framework for the 2018-19 school year.
- ***Resource Foundation.*** Wayne RESA's webpage includes field guides and training that support MTSS framework, and the district's RtI Handbook and Toolkit and its Psychological Services webpage can be useful to DPSCD as it develops local procedures and training activities.

- ***RCT Model.*** DPSCD has a resource coordinating-team (RCI) model for collaborative problem-solving, which is in use – although inconsistently – across the district.
- ***First Teaching.*** There is a new emphasis in the district on supporting teachers to provide high quality "first teaching" or Tier I instruction.
- ***Master Teacher Initiative.*** Intensive training will be provided to 52 teachers (26 in math and 26 in ELA) to support school-based instruction.
- ***MIBLSI, RtI, and PBIS.*** Various schools across the district are implemented elements of MIBLSI, RtI, and PBIS, providing a good foundation for improved practices.

OPPORTUNITIES FOR IMPROVEMENT

The following areas provide opportunities to improve teaching and learning for students with disabilities and others in DPSCD.

- ***MTSS Framework.*** DPSCD does not have a written MTSS framework in place for all students, including English learners and/or students with IEPs, that would define processes and expectations for school practices and training across the school system. Such a framework would support underperforming students who do not enroll in school until the age of six years. While Blueprint 2020 does not mention the development and use of an MTSS framework as one of its components or priorities, the framework could include many of the plan's components.
- ***UDL.*** There are no plans in place to embed universal design for learning (UDL) principles into the curriculum development and implementation process.[31]
- ***Master Teacher Initiative.*** The master teacher initiative does not include professional development on supporting positive behavior of students. Also, the master teacher initiative is not designed to include special educators, bilingual teachers, and teachers of gifted students.
- ***Use of RCT Process.*** There is no written requirements or expectations that each school have an RCT and actively use its processes for data review and problem-solving.
- ***IReady/MIBLSI.*** IReady and MIBLSI provide tools to support instruction and data-based decision making for students, but they are not consistently used across the district. In addition, use of the two systems makes it difficult to review trends across schools, grades, and groups of students.
- ***Interventions.*** Increasingly intensive interventions are not consistently defined, available, or supported by the district.
- ***PBIS Initiative.*** With no behavior specialists or coaches involved in an PBIS initiative, there

[31] UDL is defined as "a scientifically valid framework for guiding educational practice that (a) provides flexibility in the ways information is presented, in the ways students respond or demonstrate knowledge and skills, and in the ways students are engaged; and (b) reduces barriers in instruction, provides appropriate accommodations, supports, and challenges, and maintains high achievement expectations for all students, including students with disabilities and students who are limited English proficient." by Higher Education Opportunity Act (PL 110-135). See the National Center on Universal Design for Learning at http://www.udlcenter.org/.

were concerns about ongoing supports to schools and school-based monitoring with the School-Wide Evaluation Tool (SET). There were also concerns about communications with Wayne RESA.

RECOMMENDATIONS

1. ***Systemwide MTSS Framework, Implementation Plan, and Oversight.*** Embed MTSS into the district's Blueprint 2020, making explicit how the strategic plan's provisions fit into the MTSS framework and vice versa. Make clear that the framework includes all students, including students with disabilities, English learners, and accelerated learners.

   a. ***District, Network and School Leadership Teams.*** Establish leadership teams at the district, cohort, and school levels to support MTSS planning and oversee implementation activities.

   - ***District MTSS Leadership Team.*** Have the deputy superintendent and senior executive director of C/I share responsibility for the development and implementation of MTSS across the system, utilizing a team of stakeholders, e.g., cohort leaders, central office personnel, principals, and school-based personnel. When completed, schedule a two-day overview for staff and monthly meetings with the MTSS leadership team to ensure use of a common language, effective implementation, and effective resource allocations.
   - ***Cohort MTSS Leadership Teams.*** Have each cohort establish an MTSS leadership team with principals and a diverse group of school personnel who would be responsible for implementation.
   - ***School-Based Leadership Teams.*** Based on the district's MTSS-implementation plan (Recommendation1b below), establish school-based leadership teams (SBLT) at each site to provide training and guidance on activities that could be incorporated into each school's academic achievement plan. The SBLT should lead each school's MTSS work to ensure a common understanding of the framework. The SBLTs should also have defined responsibilities, such as learning/applying/modeling the problem-solving process, providing professional development and technical assistance, monitoring implementation and supports, and conducting school-based data days.
   - ***Resource Coordinating Teams.*** Establish written parameters for RCTs, including evidence-based guidelines and expectation that RCTs be implemented as designed at every school. Send a common message that RCTs are designed for problem-solving purposes, and they are not a pipeline for special education.

   b. ***Implementation Plan.*** Develop a multi-year MTSS implementation plan that includes regular updates for the board of education. Have the district's leadership team evaluate its current methodologies and tools as it develops the district's MTSS framework and plan, including universal screeners, formative assessments, standard protocols for interventions/supports, curricular materials, supplemental and intensive resources, data platforms, use of data, professional learning, budget allocations, etc. In addition, include the following components–

   - ***Framework Design.*** Review information from MIBLSI, Wayne RESA, and the DPI RtI Handbook and Tool Kit, and supplement them based on current best practices,

including information for elementary, middle, and high school grade levels.

- ***UDL.*** Embed universal design for learning (UDL) principles into the MTSS framework, and incorporate items discussed below.
- ***Department Alignment.*** Require each department to realign staff and priorities to support the MTSS plan's implementation. Ensure department deliverables are collaboratively developed and do not produce competing priorities across schools.
- ***Social Emotional Learning.*** Establish goals and expectations that schools would provide social emotional learning (SEL) as part of its MTSS work, including the use of a SEL curriculum, community wraparound services, etc.
- ***Progress Monitoring.*** Include benchmark and other regular districtwide and school-based progress-monitoring tools in the evaluation of MTSS implementation. Consider whether to continue using both IReady and MIBLSI or have one set of data systemwide.
- ***Early School Enrollment.*** Consider a citywide campaign designed to educate parents about the value of enrolling their children in early childhood programs and in kindergarten. Communicate resources to help parents access these programs.
- ***Master Teacher Program.*** Add components to the Master Teacher Program to support positive student social/emotional wellbeing and behavior. Ensure that participants are knowledgeable about teaching and learning with students with disabilities, students who are twice exceptional, English learners and those with disabilities, and gifted students.
- ***School Walk Throughs.*** Include in current walk-through protocols any elements of MTSS that current tools do not contain. Follow-up walkthrough results to identify trends, strengths, and action items. Walkthroughs should be non-evaluative, but results should be aggregated in a way that would inform central office strategies.
- ***Exemplary Implementation Models***. Provide a forum where schools can highlight and share best practices, lessons learned, victories, and challenges in implementing MTSS for *all* student groups. Identify and encourage staff to visit exemplary schools and set aside time for that to happen.
- ***District Website.*** Develop a highly visible, well-informed, and interactive web page highlighting the district's MTSS framework. Include links to other local and national sites. Highlight schools in the district that are showing results with the approach and share stories and data on the impact of MTSS on student outcomes.

Communication. When finalized, prominently post the MTSS implementation plan on the district's website, along with relevant links to district information and publicly available resources. Communicate widely with all internal and external stakeholders, including parents who are English learners, and share the purposes and expected outcomes of the plan.

c. Map Resources and Analyze/Address Gaps. As part of the MTSS planning process, assess current human resources and instructional materials provided by the district and funded by schools to ascertain their effectiveness and return-on-investment in terms of improved student outcomes. Compare the value of resources and materials currently in use in the district with other evidence-based resources in the marketplace and replace low-value

resources currently being used. Establish a menu of increasingly intensive interventions and resources, which should be vetted against current evidence on effectiveness and alignment. Ensure that the menu of interventions differentiates levels of intensity, criteria for use, and contains strategies that are linguistically and culturally appropriate for a diverse student population. Consider how federal Title I resources could enhance, supplement, or pay for more effective interventions. If necessary, phase in new interventions over a reasonably few number of years.

d. ***Written Expectations.*** Establish a school board policy[32] in support of the district's MTSS framework (for academics and social/emotional learning/restorative practices). Charge the administration with developing and implementing an MTSS framework and roll-out plan. Include expectations that the framework will be used, and that it include all grades and students and supports linguistically appropriate and culturally competent instruction. Modify the plan as the district gains experience with it. Use information and resources that district personnel, Wayne RESA, and MIBLSI have developed to inform this work.

e. ***Differentiated Professional Learning.*** Based on the MTSS framework, district goals and expectations, and implementation plan, develop and put into place a professional development program to support it. Target it on critical audiences, e.g., general/special educators, related-services personnel, paraprofessionals, and parents. Provide at least four to five days of training each year, if possible, for school-based MTSS leadership teams over the next two years. Base training on the Learning Forward Standards for Professional Learning.[33] Consider how training will be funded, e.g., through stipends, funds for substitute coverage, incentives for after-school and Saturday training, or summer training. Also, consider how training will be differentiated and sustained. In addition –

- ***Access to Differentiated Learning.*** Ensure that professional learning is engaging and differentiated based on individual skills, experience, and need. Have professional learning and technical assistance continue for new personnel and those needing additional support.
- ***Multiple Formats.*** Use multiple formats (e.g., videos, webinars, and narrative text) and presentation approaches (e.g., school-based, small groups) to provide professional development on MTSS.
- ***Coaching/Modeling.*** Develop a plan to provide coaching and technical assistance to principals and school-based leadership teams on practices covered in training sessions and materials.
- ***Cross-Functional Teams.*** Cross-train individuals from all departments working with schools to ensure a common language and understanding of MTSS. This will help align and support schools as they work on implementation. Provide direct support, mentoring, coaching, and technical assistance to principals and teachers on implementation.
- ***High-Quality Trainers.*** Identify staff members at all levels who are knowledgeable about and experienced in the components of MTSS and deploy them as professional

[32] For example, see the Providence of Education policy, retrieved from http://pesb.ppsd.org/Attachments/3ae90fc9-1936-439a-ab7f-1ebf78a0c2e2.docx

[33] Retrieved from http://www.learningforward.org/standards

developers. As necessary, supplement these staff members with experts from outside the school district.

f. ***Data Analysis and Reports.*** Review current data collection, analyses, and reports and supplement them with indicators or metrics that would be useful in determining whether schools use MTSS practices and their relationship to student achievement, e.g., growth based on appropriate instruction and intensive interventions.

g. ***Monitoring and Accountability.*** Evaluate the implementation, effectiveness, and results of MTSS, and include the following as part of the assessments–

- ***Baseline Data and Fidelity Assessments.*** Use the Self-Assessment of MTSS (SAM)[34] or other protocols for schools to self-assess their MTSS practices. Have network and districtwide leadership teams periodically review these self-assessments for validity. Incorporate SAM results into the school review process to assess fidelity to the framework.
- ***Data Checks.*** Using data and reports proposed in Recommendation 1f, have the superintendent, deputy superintendent, and senior executive director for C/I host regular data conversations with departments, network leaders, and principals to discuss results, anomalies, needed supports, follow-up activities, and outcomes.
- ***Timely Communication and Feedback.*** Assign responsibility for communicating the MTSS work to stakeholders through multiple channels, e.g., website, television, radio, social media, etc. Design feedback loops involving central office, school personnel, parents, and the community to assess problems and successes on the ground. Use this feedback to provide regular and timely feedback to the district MTSS leadership team on where and how schools require additional assistance.

[34] Retrieved from http://www.floridarti.usf.edu/resources/presentations/2016/nasp/eval/SAM%20Packet_October%202015.pdf

II. Disability Prevalence Rates and 2016-17 Evaluation Outcomes

This section presents demographic data on DPSCD students with disabilities who have individualized education programs (IEPs).[35] When available, DPSCD data are compared with students at state and national levels and with other urban school districts across the country.

In addition, data are analyzed by grade, race/ethnicity, and English learner (Els) status, so readers can fully understand the context in which DPSCD services are provided. This section also provides information about special education evaluations and the timeliness of IEPs and placements.

District Prevalence Rates

In this subsection, the percentages of DPSCD students receiving special education services are compared to urban school districts across the country and to the nation. Also, incidence data are disaggregated for early childhood and kindergarten children, and school-age students by disability area, grade, race/ethnicity, and English learner status.[36]

Comparison of DPSCD, Urban Districts, National, and State Special Education Rates

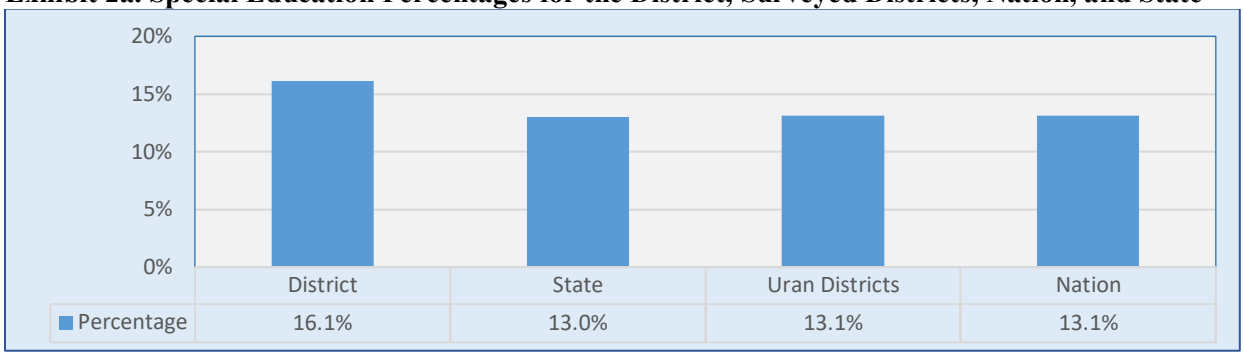
DPSCD enrolls 8,731 students with IEPs who are three through 26 years of age, including those in separate schools (in and outside the district). This number comprises 16.1 percent of all students enrolled in the school district. This figure is higher than the average of 13.1 percent across 75 urban school districts on which we have data.[37] Among these urban districts, DPSCD ranks 55th in the percentage of students with IEPs, which ranged from 8 percent to 21 percent.[38]

The district's 16.1 percent special education rate is also higher than the 13.0 percent state rate and the 13.1 percent national figure, which has decreased since 2004-05 when it was 13.8 percent.[39] (See exhibit 2a.)

As discussed below, DPSCD's relatively high incidence rate is driven in part by the lower number of students with IEPs attending Detroit's charter schools. Furthermore, when excluding students with IEPs from outside of Detroit attending DPSCD schools pursuant to school choice requirements or the Wayne RESA plan, the percentage is 15.5 percent.

[35] Students with disabilities who have IEPs and receive special education services are also referred to as students with IEPs. These data are limited to students with a disability under the IDEA and does not include students with Section 504 plans.
[36] Unless otherwise stated, all DPSCD data were provided by the district to the Council team and are for the 2017-18 school year.
[37] Most data were provided by school districts that responded to a survey conducted by the Urban Special Education Leadership Collaborative; the Council team or a member of the team obtained the remaining data during district reviews. The rates by district are provided in Appendix A. Incidence Rates and Staffing Survey Results.
[38] The data cover several years, but in most cases, ratios do not change dramatically from year to year.
[39] U.S. Department of Education, National Center for Education Statistics. (2015). *Digest of Education Statistics*. The rates are based on 2011-12 data based on students 3 through 21 years of age. http://nces.ed.gov/fastfacts/display.asp?id=64.

Exhibit 2a. Special Education Percentages for the District, Surveyed Districts, Nation, and State



	District	State	Uran Districts	Nation
Percentage	16.1%	13.0%	13.1%	13.1%

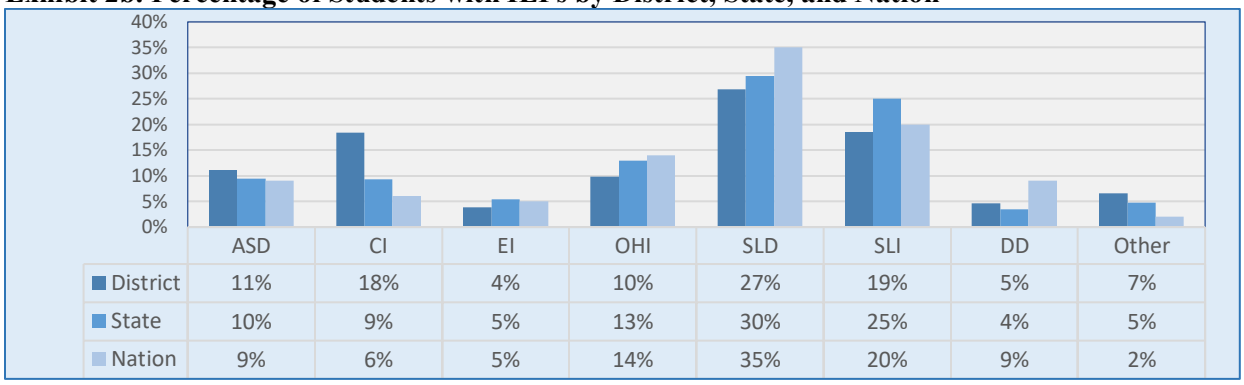
Rates by Disability Areas for District, State and Nation

Data in exhibit 2b show the percentage of students in the district, state, and nation by the most common disability areas. These disability areas include the autism spectrum disorder (ASD), cognitive impairment (CI), emotional impairment (EI), other health impairment (OHI), specific learning disability (SLD), speech/language impairment (SLI), and developmental disability (DD).

DPSCD students with IEPs are identified as having a disability at rates like those at the state level in the areas of autism and EI. The district's percentages significantly exceed state and national rates in the areas of CI (18 percent, 9 percent, and 6 percent, respectively).

The nation has larger percentages than DPSCD in the areas of OHI (14 percent and 10 percent, respectively) and SLD (35 percent and 27 percent, respectively). In the area of SLI, the state's 25 percent figure exceeds DPSCD's by six points.

Exhibit 2b. Percentage of Students with IEPs by District, State, and Nation[40]



	ASD	CI	EI	OHI	SLD	SLI	DD	Other
District	11%	18%	4%	10%	27%	19%	5%	7%
State	10%	9%	5%	13%	30%	25%	4%	5%
Nation	9%	6%	5%	14%	35%	20%	9%	2%

DPSCD and Detroit Charter School Enrollment and Special Education Demographics

To compare the special education demographics of district and charter schools, it is important to compare total enrollment data over time. The data in exhibit 2c show that between 2012-13 and 2016-17, DPS(CD)[41] enrollment decreased by 20,575 students (66,132 to 45,557, or

[40] National and state data are based on the U.S. Department of Education's 2014 IDEA Part B Child Count and Educational Environment database, retrieved from 2014-15 USDE IDEA Section 618 State Level Data Files, retrieved at http://www2.ed.gov/programs/osepidea/618-data/state-level-data-files/index.html#bccee. Unless otherwise stated, all DPSCD data were provided by the district to the Council's team.

[41] DPS(CD) is used to refer to the district in years that include either DPS or DPSCD.

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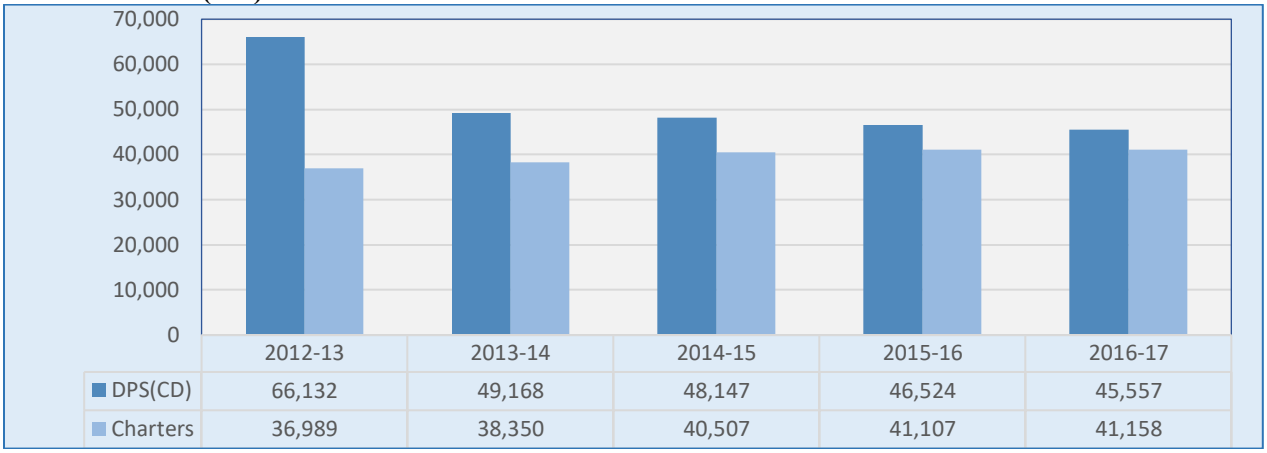
31.10 percent), while charter school enrollment increased by 4,169 students (36,989 to 41,158, or 11.3 percent). These figures indicate that DPS(CD)'s percentage of all public-school students in Detroit dropped from 64.1 percent to 52.5 percent, while the total school enrollment dropped from 103,121 students to 86,715 in those five years (enrollment at DPS(CD) and Charters).

Exhibit 2c. DPS(CD) and Charter School Student Enrollment Over Time

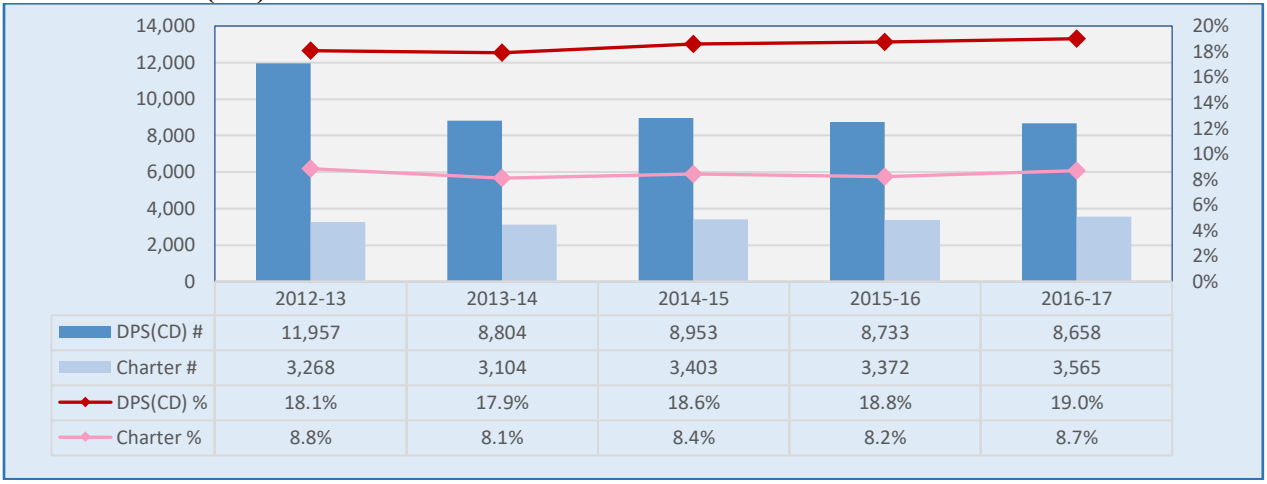


	2012-13	2013-14	2014-15	2015-16	2016-17
DPS(CD)	66,132	49,168	48,147	46,524	45,557
Charters	36,989	38,350	40,507	41,107	41,158

Disability Rates for District and Charter Schools Over Time

Data in exhibit 2d show changes in the numbers and percentages of students with IEPs in DPS and DPSCD [DPS(CD)] and Detroit's charters between 2012-13 and 2016-17. During this period, the district's percentage of students with IEPs increased from 18.1 percent to 19.0 percent while the percentage in charter schools remained about the same (8.8 percent to 8.7 percent). The special education rate gap between the district and charters grew from 9.2 percentage points to 10.3 percentage points, even though charter school enrollment increased by 4,169 students (or 11.3 percent) and the district enrollment decreased by 20,575 students (or -31.1 percent).[42] Using a risk ratio methodology, students in DPS(CD) are twice as likely as charter school students to have an IEP.

Exhibit 2d. DPS(CD) and Charter School Number/Percent of Students with IEPs



	2012-13	2013-14	2014-15	2015-16	2016-17
DPS(CD) #	11,957	8,804	8,953	8,733	8,658
Charter #	3,268	3,104	3,403	3,372	3,565
DPS(CD) %	18.1%	17.9%	18.6%	18.8%	19.0%
Charter %	8.8%	8.1%	8.4%	8.2%	8.7%

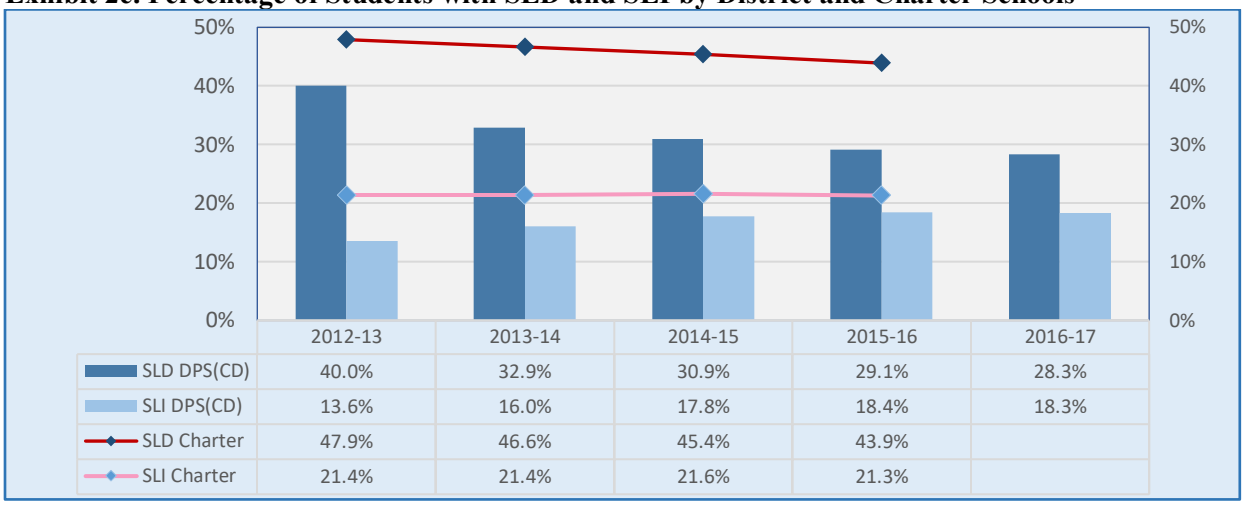
[42] Data for district and charter school comparisons here and below are based on a May 2017 document that DPSCD provided, which is based on mischooldata.org. Charter data were not provided for 2016-17.

SLD and SLI Rates by DPS(CD) and Charters

In the most common disability areas of specific learning disabilities and speech/ language impairment, charter schools have higher percentages than does DPS(CD). (See exhibit 2e.)

- ***SLD***. In 2012-13, the area of SLD constituted 47.9 percent of charter school students with IEPs, compared to the district's 40.0 percent. By 2015-16, the gap grew by 14.8 percentage points (29.1 percent to 43.9 percent, respectively). The district's rate fell in 2016-17 to 28.3 percent.
- ***SLI***. In 2012-13, the area of SLI constituted 21.4 percent of charter school students with IEPs, compared to the district's 13.6 percent. By 2015-16, the gap between charter and district percentages narrowed to 2.9 percentage points (21.3 percent to 18.4 percent, respectively). The district's rate fell slightly to 18.3 percent in 2016-17.

Exhibit 2e. Percentage of Students with SLD and SLI by District and Charter Schools



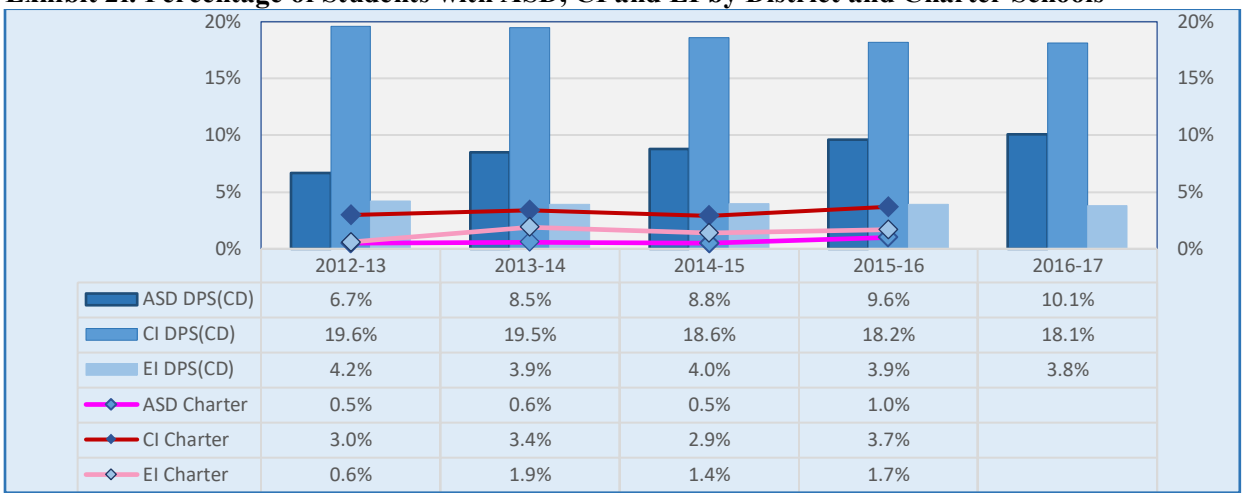
	2012-13	2013-14	2014-15	2015-16	2016-17
SLD DPS(CD)	40.0%	32.9%	30.9%	29.1%	28.3%
SLI DPS(CD)	13.6%	16.0%	17.8%	18.4%	18.3%
SLD Charter	47.9%	46.6%	45.4%	43.9%	
SLI Charter	21.4%	21.4%	21.6%	21.3%	

ASD, CI, and EI Rates by DPS(CD) and Charter Schools

Students with autism spectrum disorder, cognitive impairment, and emotional impairment typically have conditions that require more intensive supports and they are placed in more restrictive and separate classes and school environments more frequently than students with SLD and SLI. Data in exhibit 2f show that the percentages of DPS(CD) students with IEPs in any one of these three disability areas are substantially higher than the percentages of these students in charter schools. The following comparisons are on district data from 2012-13 to 2016-17 and charter school data from 2012-13 to 2015-16, the last year on which DPSCD provided data.

- ***ASD***. The district's rate increased from 6.7 percent to 10.1 percent (838 students), while the charter school rate increased from 0.5 percent to 1.0 percent (34 students).
- ***CI***. The district's rate decreased from 19.6 percent to 18.1 percent (1,589 students), while the charter schools' rate increased from 3.0 percent to 3.7 percent (125 students).
- ***EI.*** The district's rate decreased from 4.2 percent to 3.8 percent (340 students), while the charter schools' rate increased from 0.6 percent to 1.7 percent (57 students).

Exhibit 2f. Percentage of Students with ASD, CI and EI by District and Charter Schools



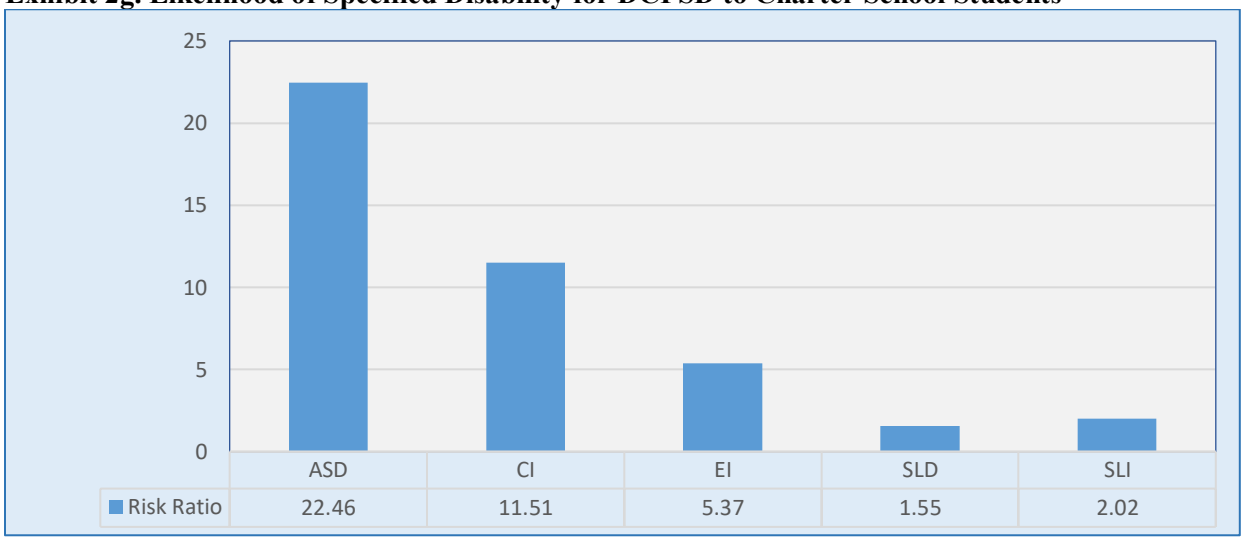
	2012-13	2013-14	2014-15	2015-16	2016-17
ASD DPS(CD)	6.7%	8.5%	8.8%	9.6%	10.1%
CI DPS(CD)	19.6%	19.5%	18.6%	18.2%	18.1%
EI DPS(CD)	4.2%	3.9%	4.0%	3.9%	3.8%
ASD Charter	0.5%	0.6%	0.5%	1.0%	
CI Charter	3.0%	3.4%	2.9%	3.7%	
EI Charter	0.6%	1.9%	1.4%	1.7%	

Furthermore, DPSCD data show that the district enrolled 155 students with a severe multiple impairment (SXI)--with almost all attending a separate center school. Data for students with this disability were not provided on charter schools, but it is highly unlikely that these school enroll any – or very few – students with SXI.

Disability Area Risk Ratios for DPSCD Compared to Charter Schools

A risk ratio measurement shows the likelihood that DPSCD students have a specific disability compared to charter school students in Detroit. In the three most severe disability areas discussed above, district students have risk ratios of 22.46 for autism, 11.51 for cognitive impairment, and 5.37 for emotional impairment. Conversely, the two disability areas typically requiring relatively less-intensive special education/related services show risk ratios in DPSCD compared to charter school students with IEPs of 1.55 for specific learning disability and 2.02 for speech/language impairment. (See exhibit 2g.) The financial implications of this disproportionate responsibility for students with more significant special education needs are discussed in section IV. Support for Teaching and Learning for Students with Disabilities, Fiscal issues.

Exhibit 2g. Likelihood of Specified Disability for DCPSD to Charter School Students

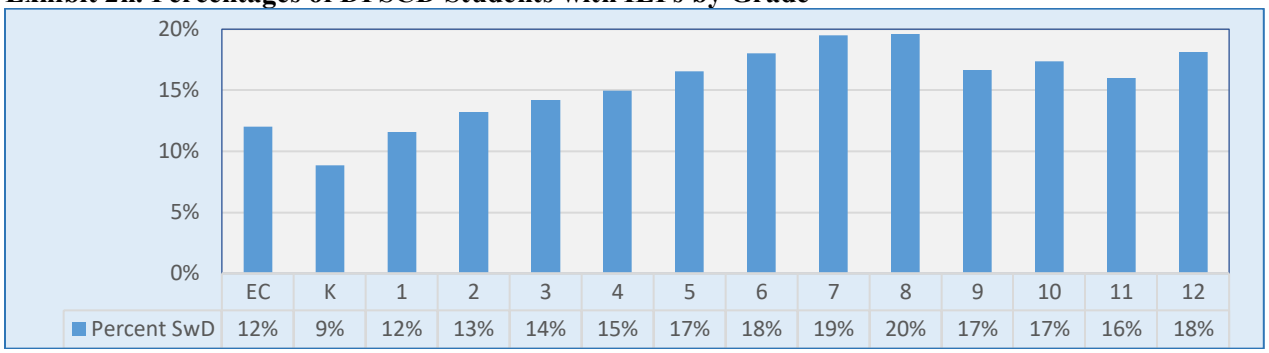


	ASD	CI	EI	SLD	SLI
Risk Ratio	22.46	11.51	5.37	1.55	2.02

DPSCD Disability Rates by Grade

The team also examined the percentage of all students with disabilities by grade. The results showed that some 12 percent are at the early childhood level. The percentage drops to 9 percent at kindergarten, jumps to 12 percent at first grade, and gradually increases to 19 percent and 20 percent in seventh and eighth grade, respectively. Percentages drop at the high school level, where they fluctuate between 18 percent (twelfth grade) and 16 percent (eleventh grade). (See exhibit 2h.)

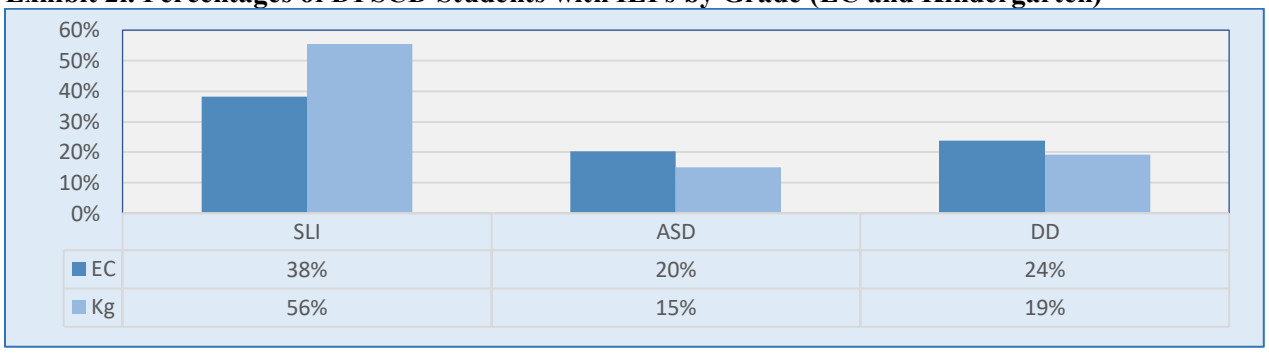
Exhibit 2h. Percentages of DPSCD Students with IEPs by Grade



SLI, ASD, and DD Disabilities by Grade: Early Childhood and Kindergarten

Data in exhibit 2i show the percentages of students who are in early childhood (EC) programs and kindergarten by the three most common disability areas: speech/language impairment (SLI), autism spectrum disorder (ASD), and developmental disability (DD). These data show that SLI is the most common disability at both grade levels (38 percent for EC and 56 percent for kindergarten). The high kindergarten SLI figure eclipses ASD and DD (15 percent and 19 percent, respectively), which are lower than the EC figures of 20 percent and 24 percent, respectively.

Exhibit 2i. Percentages of DPSCD Students with IEPs by Grade (EC and Kindergarten)



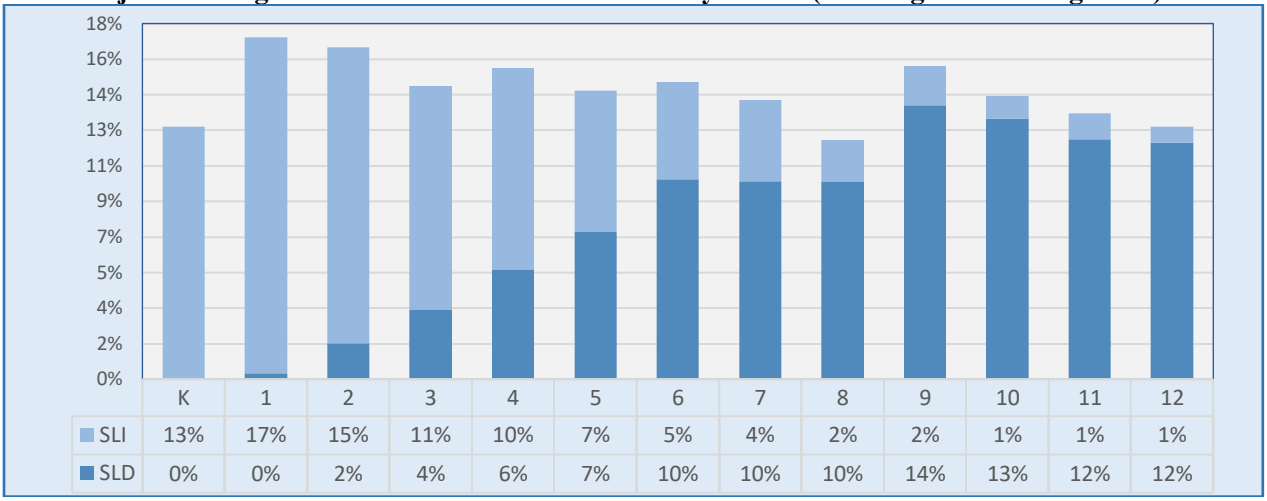
SLD and SLI Disabilities by Grade (K through 12th)

Data in exhibit 2j show the percentages of all students with a specific learning disability (SLD) and all students with a speech/language impairment (SLI) by grade level. These data indicate that as the area of SLI decreases, SLD increases. SLI decreases from a high of 17 percent in first grade to a low of 1 percent in grades 10, 11, and 12, while SLD increases from a low of 0

percent in kindergarten and first grade to anywhere from 12 to 14 percent in grades 9 through 12. Both disabilities have rates of 7 percent in fifth grade.

This pattern raises a question with the team about the extent to which students with learning issues are first identified as SLI and then later identified as SLD. With the largest percentage of students with SLD educated in grades sixth and upward, one wonders if these students are being identified early enough to receive the intensive interventions necessary to increase their achievement overall.

Exhibit 2j. Percentages of Students with SLI and SLD by Grade (Kindergarten through 12th)



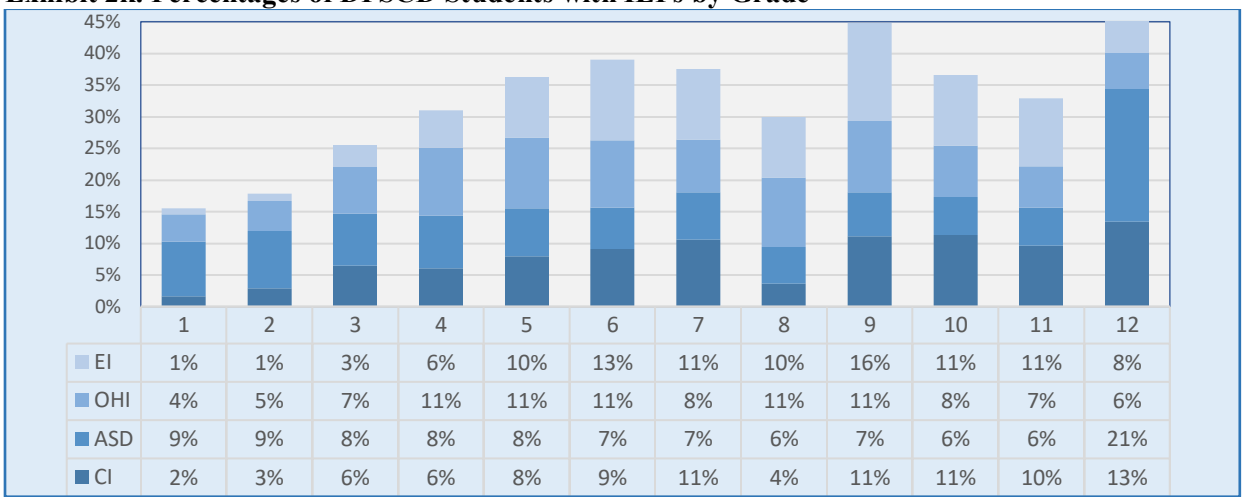
	K	1	2	3	4	5	6	7	8	9	10	11	12
SLI	13%	17%	15%	11%	10%	7%	5%	4%	2%	2%	1%	1%	1%
SLD	0%	0%	2%	4%	6%	7%	10%	10%	10%	14%	13%	12%	12%

EI, OHI, ASD and CI Disabilities by Grade (1st through 12th)

Data in exhibit 2k show the percentages of students by grade in the areas of emotional impairment, other health impairment, autism spectrum disorder, and cognitive impairment. These figures show the following:

- ***Emotional Impairment.*** A very small percentage of students with EI are identified at grades 1 and 2 (1 percent). The rate increases at grade 6 (13 percent), and again at grade 9 (16 percent) when it decreases in grade 12 (8 percent).
- ***Other Health Impairment.*** Beginning with smaller percentages at grades 1 and 2 (4 percent and 5 percent, respectively), the OHI rate increases to highs of 11 percent at grades 4, 5, 6, 8, and 9) and decreases to 6 percent at grade 12.
- ***Autism Spectrum Disorder.*** Except in grade 12, there was less variation by grade for students with ASD than there was in other disability area. For these grades, the rates ranged from 9 percent (grades 1 and 2) to 6 percent (grades 8, 10, and 11). The rate spikes in grade 12 at 21 percent.
- ***Cognitive Impairment.*** Given the nature of cognitive impairment, one would expect that this disability area would be relatively stable by grade. However, these rates vary from lows of 2 percent to 4 percent (grades 1, 2, and 8) to highs of 10 percent to 13 percent (grade 7 and high school). This variation may reflect the identification of students with mild (and more judgmental) impairments rather than the more significant (and less judgmental) impairments.

Exhibit 2k. Percentages of DPSCD Students with IEPs by Grade

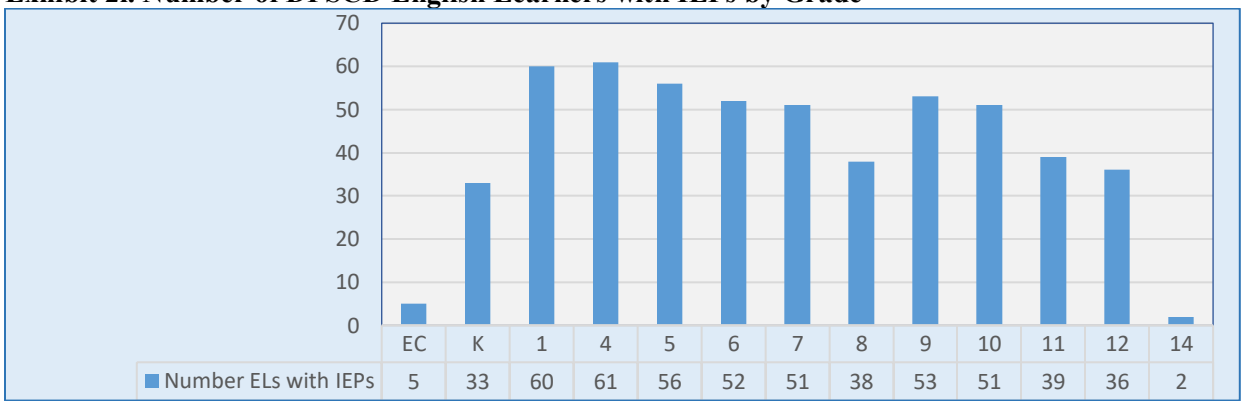


	1	2	3	4	5	6	7	8	9	10	11	12
EI	1%	1%	3%	6%	10%	13%	11%	10%	16%	11%	11%	8%
OHI	4%	5%	7%	11%	11%	11%	8%	11%	11%	8%	7%	6%
ASD	9%	9%	8%	8%	8%	7%	7%	6%	7%	6%	6%	21%
CI	2%	3%	6%	6%	8%	9%	11%	4%	11%	11%	10%	13%

English Learners by Grade

Data in exhibit 2l show the number of English learners (ELs) with IEPs by grade. Overall, a very small number of ELs are provided special education at the early childhood level. The number increases at kindergarten, nearly doubles in grade 1, and steadily decreases between grades 4 but increases again in grades 9 and 10 before dropping in grades 11 and 12. Very few students are identified as English learners after grade 12.

Exhibit 2l. Number of DPSCD English Learners with IEPs by Grade

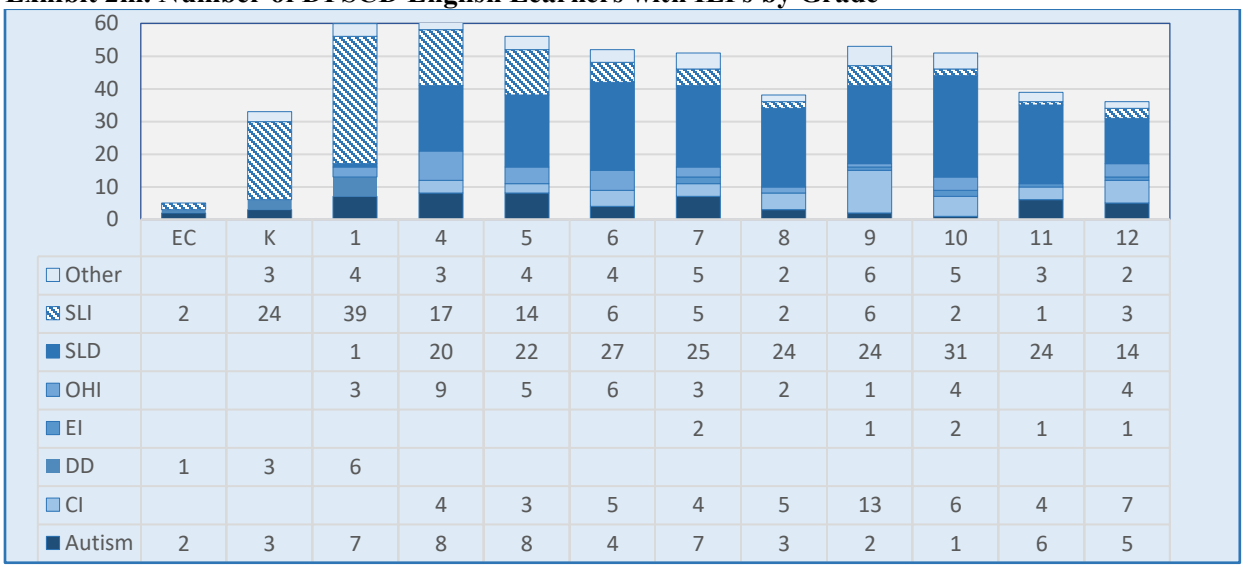


	EC	K	1	4	5	6	7	8	9	10	11	12	14
Number ELs with IEPs	5	33	60	61	56	52	51	38	53	51	39	36	2

ELs by Disability and by Grade

Data in exhibit 2m show the number of ELs in seven disability areas by grade. More ELs are classified as having a speech/language impairment in kindergarten through grade 1 than any other disability area. This trend changes in grades 4 through 12 when more students are identified with a specific learning disability. The switch from SLI to SLD for all students with disabilities occurs later in grade 6. ELs are not identified as having a cognitive impairment until grade 4 and the highest number is at grade 9. Furthermore, only five students were identified as having a disability at the early childhood level and post grade 12. Although it is difficult to determine if a student's learning difficulties are related to the acquisition of English or to a disability, these patterns raise questions about the district's 'child find' and identification processes, and postsecondary transition outreach to parents and students.

Exhibit 2m. Number of DPSCD English Learners with IEPs by Grade



	EC	K	1	4	5	6	7	8	9	10	11	12
Other		3	4	3	4	4	5	2	6	5	3	2
SLI	2	24	39	17	14	6	5	2	6	2	1	3
SLD			1	20	22	27	25	24	24	31	24	14
OHI			3	9	5	6	3	2	1	4		4
EI							2		1	2	1	1
DD	1	3	6									
CI				4	3	5	4	5	13	6	4	7
Autism	2	3	7	8	8	4	7	3	2	1	6	5

DPSCD Disability Incidence by Race/Ethnicity

This subsection covers the extent to which DPSCD students from each of the most common racial/ethnic groups are proportionate to each other. According to MDE's latest FY 2015 State Performance Plan/Annual Performance Report (SPP/APR), which was published on January 23, 2018, disproportionate representation is defined as –

> A verified ratio greater than 2.5 for two consecutive years for any racial/ethnic group in one of six eligibility categories was used to identify districts for focused monitoring activities. In cases where the sum of all other students with an individualized education program (IEP) equals fewer than ten, an alternate risk ratio (ARR) was calculated for the race under consideration.

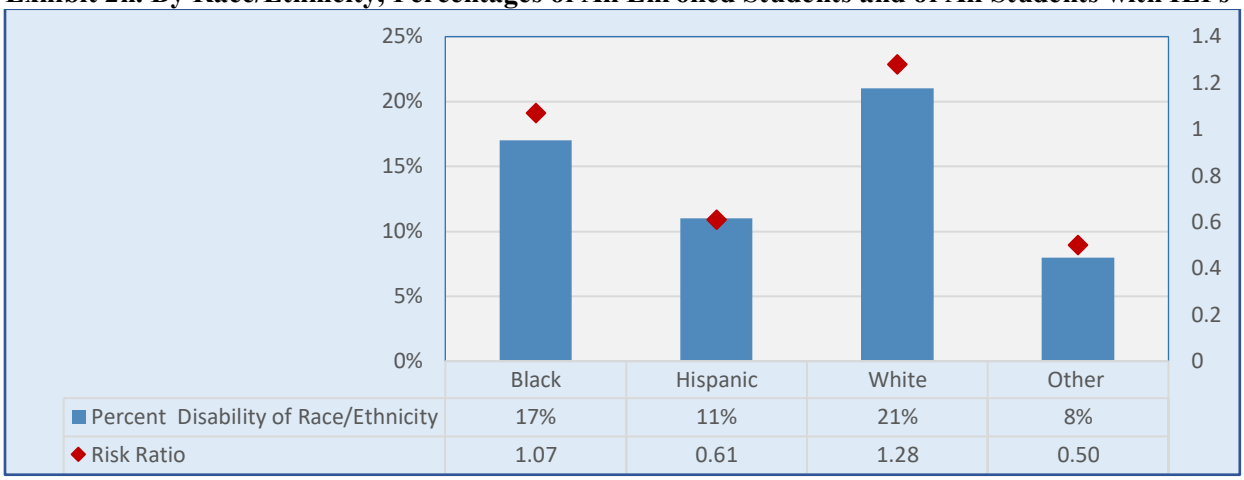
According to MDE's SPP/MDR, the department's Office of Special Education (OSE) will conduct an on-site visit or issue a Monitoring Activities Report on districts with risk ratios greater than 2.5 for two consecutive school years.[43] According to MDE representatives with whom the Council team spoke, more oversight responsibility is being transferred to RESAs since they distribute IDEA funds to school districts in each of their regions.

Race/Ethnicity Percentage and Risk Ratios for All Students with IEPs

Exhibit 2n shows the percentages of students with disabilities by race/ethnicity and their related risk ratios. These figures indicate that the percentages of students with disabilities were 17 percent of all black students, 11 percent of all Hispanic; 21 percent of all white students; and 8 percent of all other students. Using MDE's risk ratio threshold of "2.5," the risks for identification are not disproportionate or unusually high or low in any of these racial/ethnic groups. Compared to all other racial/ethnic groups, white students had the highest risk at 1.28. Other students have the lowest risk at 0.50. Black and Hispanic students were in between.

[43] Retrieved from https://osep.grads360.org/#report/apr/2015B/publicView?state=MI&ispublic=true.

Exhibit 2n. By Race/Ethnicity, Percentages of All Enrolled Students and of All Students with IEPs

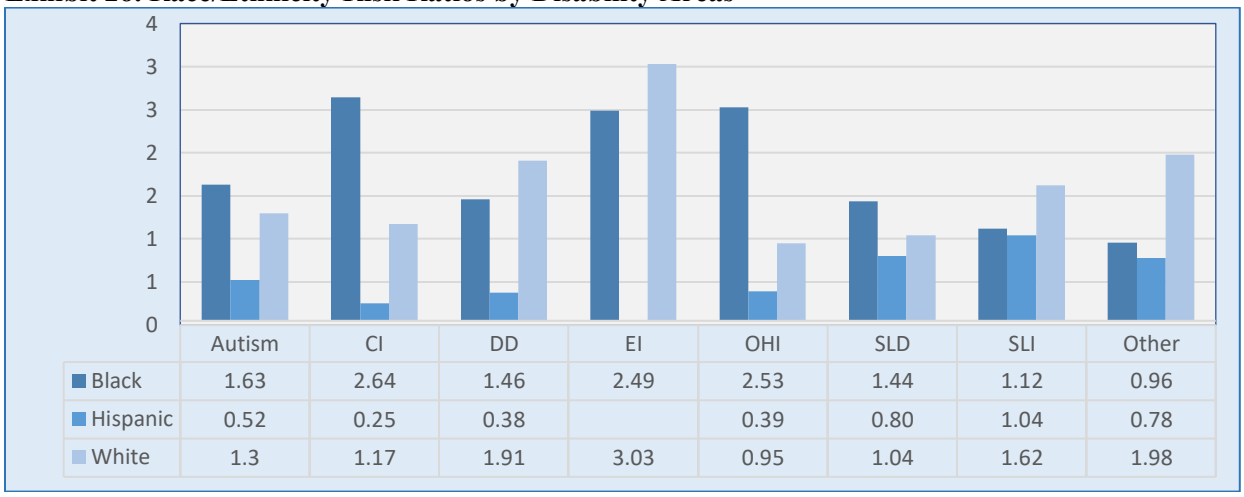


	Black	Hispanic	White	Other
Percent Disability of Race/Ethnicity	17%	11%	21%	8%
Risk Ratio	1.07	0.61	1.28	0.50

Race/Ethnicity Prevalence for Students with Most Common Disabilities

Exhibit 2o shows racial/ethnic risk ratios by disability area. These figures indicate risk ratios exceeding MDE's 2.5 threshold in the following areas: black students with cognitive impairment (2.64) and white students with an emotional impairment (3.03). With a risk ratio of 2.49, black students with an emotional impairment were near the 2.5 threshold. In its FY 2015 state performance plan, MDE did not find DPCSD to have disproportionate representation.

Exhibit 2o. Race/Ethnicity Risk Ratios by Disability Areas



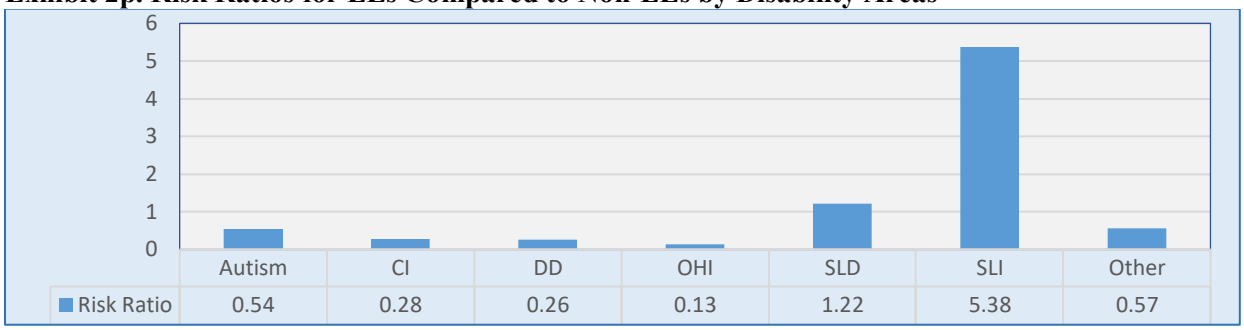
	Autism	CI	DD	EI	OHI	SLD	SLI	Other
Black	1.63	2.64	1.46	2.49	2.53	1.44	1.12	0.96
Hispanic	0.52	0.25	0.38		0.39	0.80	1.04	0.78
White	1.3	1.17	1.91	3.03	0.95	1.04	1.62	1.98

Disparities by Language Status (EL and Non-EL)

Overall, 10 percent of all students who were ELs had an IEP, compared to 17 percent of students who are not ELs. Using a risk ratio, ELs were 0.57 times less likely than non-ELs to have an IEP. This suggests a possible under-representation.

When examined by disability area, the most notable risk for ELs was among those with a speech/language impairment who were 5.38 times more likely to be identified as non-ELs. (See exhibit 2p.) Although the disproportionality of ELs to non-ELs was not included in the state performance plan, it is an important area to address when significant disparities exist.

Exhibit 2p. Risk Ratios for ELs Compared to Non-ELs by Disability Areas



Special Education Eligibility and Timeliness

DPSCD also provided the Council team with data showing the numbers of students who were referred for an evaluation during the 2015-16 school year, whether they qualified for an IEP, and results by disability area.

Evaluations Completed and Qualification for IEPs

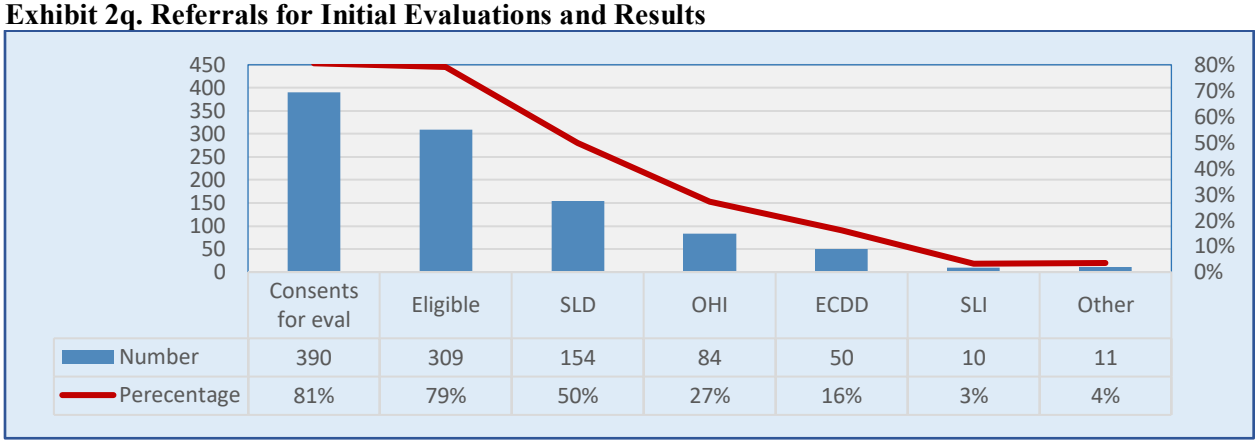
As data in exhibit 2q show, of 484 requests for special education evaluations, parental consents were provided for 390 students or 91 percent of requests. Reportedly, the evaluation process generally is initiated upon a parent's written request.

There was a perception that school personnel did not always understand that the RCT process should be followed after a parent's request to determine if there was a basis to suspect that the child would qualify for special education and then to proceed with an evaluation.

For students with parental consents, 309 (79 percent) were found eligible for special education in the following major disability areas: 50 percent for a specific learning disability; 27 percent for other health impairment, 16 percent for early childhood developmental disabilities; 3 percent for speech language impairment; and 4 percent for other disability areas.

Interestingly, these figures were considerably different from overall district rates shown in exhibit 2c, which showed 27 percent for specific learning disability; 10 percent for other health impairment, 5 percent for developmental disabilities; and 19 percent for speech language impairment.

Exhibit 2q. Referrals for Initial Evaluations and Results



Timeliness of Evaluations

The following information relates to various categories of disability that have time lines set by federal and state law.

Early Intervention: Timeliness of IEPs Implemented by Third Birthday for Children

Michigan's latest state performance plan (SPP) indicator results for DPSCD, which shows data from 2015-16, reports the percentage of students referred from early intervention prior to age three who were found to be eligible for special education and had an IEP developed and implemented by their third birthdays.[44] Data show that 17.4 percent of DCPSD children met this standard. The compliance standard is 100 percent.

Timeliness of Evaluations and IEPs

According to Michigan's 2015-16 SPP report, 99.8 percent of initial evaluations and IEPs were completed in a timely manner by DCPSD. In addition, DCPSD had 2016-17 data from MDE showing only three overdue initial evaluations. However, according to an excel report with MISTAR data from February 2, 2018, some 281 annual IEPs, 57 initial IEPs, and 92 triennial IEPs were not completed on time. A district representative explained that many of IEPs appear to be overdue on the report because the caseload manager had not yet validated timeliness data in the system. Reportedly, delays are due in part to staffing vacancies and the pressure the timelines put on special education operations.

AREAS OF STRENGTH

The following are areas of strength in the district's disability prevalence rates, evaluation outcomes, and IEP timeliness.

- ***Timeliness of Initial IEPs***. According to MDE's 2015-16 SPP report, 99.8 percent of initial evaluations and IEPs were completed in a timely manner. The district's rate is very close to meeting the strict 100 percent compliance requirement.
- ***Reliance on DPSCD for Special Education.*** Charter schools relied on DPSCD to educate students with disabilities that generally required more intensive special education and related services, such as students with autism spectrum disorder, cognitive impairments, and emotional impairments. This reliance puts pressure on the district's resources that are not fully funded by the state.

There were not significant areas of disproportionality by race alone in the identification of students for special education although there were disproportionalities by race and disability area.

OPPORTUNITIES FOR IMPROVEMENT

The following areas provide opportunities for improvement.

- ***Comparative Incidence Rates.*** Some 16.1 percent of students three through 26 years of age

[44] Michigan Department of Education Special Education (Part B of IDEA) Public Reports, ppublished May 2017.

have an IEP, compared to 13 percent of the national average and urban school districts on which we have data. Excluding students with IEPs attending district schools pursuant to school choice or the Wayne RESA plan, the percentage was 15.5 percent.

- ***Charters Compared to DPSCD.*** As the district's percentage of students with IEPs increased, the percentage in charter schools decreased. The gap between the two grew from 9.2 percentage points to 10.3 percentage points. In 2016-17, DPSCD students were twice as likely to have an IEP as charter school students. Furthermore, charter schools had higher proportions of students with less intensive needs, i.e., speech/language impairments and specific learning disabilities, than they had students with high intensive needs, e.g., autism spectrum disorder, cognitive impairments, and emotional impairments. Using a risk ratio calculation, the likelihood that DPSCD students would have one of these three disabilities compared to charter students was 22.46, 11.51, and 5.37, respectively.
- ***Grade Configuration.*** The overall percentage of students with IEPs increased steadily from kindergarten to seventh and eighth grade. The area of specific learning disabilities and emotional impairments reached their highest rates at ninth grade (14 percent and 16 percent, respectively). These figures suggest that students may not be identified before they have experienced academic failure when there would be more time for intensive interventions.
- ***English Learners.*** Almost all ELs with IEPs were classified as having a speech/language impairment in kindergarten and grade 1, and most were identified with a specific learning disability beginning at grade 4. Furthermore, only five students were identified as having a disability at the early childhood level and post grade 12. Although it is difficult to determine if a student's learning difficulties are related to the acquisition of English or to a disability, these patterns raised questions to the team about the district's 'child find' and identification process and the district's postsecondary outreach to parents and students. ELs were 5.38 times more likely than non-ELs to have a speech/language impairment.
- ***Racial/Ethnic Disproportionality.*** The following categories of students exceeded MDE's 2.5 risk ratio threshold: black students with cognitive impairment (2.64) and white students with an emotional impairment (3.03). Black students with emotional impairments (2.49) were near the 2.5 threshold. In its FY 2015 state performance plan, MDE did not find generally that the district exceeded disproportionate representation thresholds.
- ***Parent Evaluation Request.*** Generally, a special education request is initiated through a parent request, rather than through an RCTs determination that there was a basis for suspecting a possible disability and potential need for special education.
- ***Evaluation and IEP Timeliness.*** Based on MDE's data for 2015-16, some 17.4 percent of children had an IEP in place by their third birthday when they were found to be eligible for special education. In addition, as of February 2, 2018, district data showed 281 annual IEPs, 57 initial IEPs, and 92 triennial IEPs had not been completed in a timely manner. Reportedly, many of these actions may have been because there were delays in the caseload manager's validation of dates in the data system. Delays were attributed by interviewees to staffing vacancies.

RECOMMENDATIONS

2. ***Demographics, Referral and Identification of Disability.*** Improve the overall consistency and appropriateness of referrals, assessments, and eligibility decisions in special education.

   a. ***Data Review.*** With a multi-disciplinary team of staff members in and outside the special education department, review exhibits 2a through 2q (along with MDE's latest SPP results. Include representatives from C/I, English learners, principal leaders, principals, etc. Have the team develop hypotheses about patterns in the results presented in this section. For example, when examining the district's high percentage of students identified as needing special education, investigate what the percentage might be if figures included all public-school students in Detroit or what they might be without students with an IEPs from other districts. (The Council team did not have access to these data.) Include in the data review significantly different disability rates by school and cohort; how disability patterns change by grade; and over and under representation of various student groups.

   b. ***Implementation Plan.*** Based on these data and the staff's hypotheses about why the patterns look like they do, embed in the MTSS implementation plan activities relevant to the RCTs, including problem-solving, guidance on how to determine whether a student's lack of progress is due to a disability or to inadequate access to appropriate core instruction, increasingly intensive interventions, supports, and progress monitoring, etc. (Coordinate this activity with Recommendation 1b.) Also, consider using a playgroup model to assess young children.

   c. ***Written Expectations.*** In each area identified by the multi-disciplinary team as problematic, review district processes, including referrals, assessments, and eligibility, and amend them to provide more specific guidance.

      - ***Standard Operating Procedures Manual***. Ensure that the district's comprehensive standard-operating-procedures manual for special education incorporates this guidance. (Coordinate with Recommendation 7a.)
      - ***RCT Practices.*** Require that RCTs function within an MTSS framework, and that personnel who assess students for special education consider the extent to which students might benefit from increasingly intensive interventions based on problem-solving and progress monitoring.[45] (Coordinate this activity with Recommendation 1a.)
      - ***English Learners.*** Incorporate in the manual information relevant to ELs, such as that included in MDE's Guidance Handbook for Educators of English Learners with Suspected Disabilities.[46]
      - ***Lack of Progress.*** Provide guidance on evaluating students' lack of progress. Have RCTs include in their procedures appropriate referrals for Section 504 services as well as for special education.
      - ***Referral Practices.*** Make sure that written guidance and practice is included on

[45] This process does not include students with "obvious" disabilities, such as those with significant cognitive disabilities, blindness, deafness, etc.

[46] Retrieved from http://www.michigan.gov/documents/mde/ELs_with_Suspected_Disabilities_Guidance_Handbook_-_2017_558692_7.pdf.

parental requests for a special education evaluation when there is evidence of a suspected disability.

- ***Exiting Special Education.*** Establish guidelines for determining when and under what circumstances a student no longer needs special education to progress educationally. A transition to services under Section 504 may be appropriate for such children.

Recommendations relevant to the timely transition of students from Part C services, and proposals on timely IEPs are provided later in this report. (See IV. Support for Teaching and Learning for Students with Disabilities, Accountability.)

d. ***Differentiated Professional Learning.*** Plan for and provide all relevant district stakeholders with the professional development they need to implement the recommendations in this report. Have personnel from the special education and English language learner departments collaborate on the referral and assessment needs of EL students. (Coordinate this activity with Recommendation 1e.)

e. ***Data Analysis and Reports.*** Develop and provide regular user-friendly summary reports to district leadership showing data like those in exhibits 2a through 2m. Share data by cohort and by school within cohorts.

f. ***Monitoring and Accountability.*** Develop a process for ongoing monitoring of expected referrals, evaluations, and eligibility practices. Rather than using a traditional record-review compliance model, review data with schools so that they are aware of problems, and they are better prepared for follow-up action. Enable staff to observe best practices and receive coaching that will improve their knowledge and skills. (Coordinate this activity with Recommendation 1g.) Consider folding disability rates into cohort and school accountability systems.

III. Teaching and Learning for Students with Disabilities

The U.S. Department of Education has moved from a compliance-only posture in special education to a Results-Driven Accountability (RDA) model. This change is based on data showing that the educational outcomes of America's children and youth with disabilities had not improved as expected, despite significant federal efforts to close achievement gaps. The accountability system that existed prior to this shift placed substantial emphasis on procedural compliance, but it often did not consider how that compliance affected the learning outcomes of students.[47]

The Education Department's Office of Special Education Programs' (OSEP) vision for RDA involved having all accountability components supporting states in improving results for students with disabilities. This approach is consistent with IDEA, which requires that the primary focus of the federal program be on improving educational results and functional outcomes for students with disabilities, along with meeting IDEA requirements. RDA fulfills these requirements by focusing on both outcomes for students with disabilities and on compliance with the law.[48]

According to its July 1, 2016 State Performance Plan (SPP)/Annual Performance Report (APR), Michigan is implementing ED's Results Driven Accountability (RDA) priorities by using all indicators (compliance and performance) to make compliance determinations. As previously discussed, the Michigan Department of Education's SSIP uses a multi-tiered system of supports (MTSS) framework to help coordinate resources and align initiatives across the department in order to ensure improvement at all levels of the system. MDE is also establishing state targets for the percentage of K-3 students with IEPs in participating schools who achieve benchmark status in reading as defined by a curriculum-based measurement. In addition to disaggregating results for students with IEPs, MDE will compute scores for K-3 students who are economically disadvantaged, English learners; and all students. Baselines and targets will be established and recalculated as additional data become available.[49]

This section of the report looks at results for students with disabilities and how DPSCD is supporting the teaching and learning of students with IEPs, including young children ages three to five years. This section has the following subsections:

- Education of Young Children Ages Three to Five Years
- Student Achievement on NAEP and Statewide Assessments
- Educational Settings for Students with Disabilities
- Suspension and Expulsion Rates
- Academic Instruction, Interventions, and Supports
- Instruction for Students in SDC Programs
- Professional Learning

[47] April 5, 2012, RDA Summary, U.S. Department of Education at www2.ed.gov/about/offices/list/osers/osep/rda-summary.doc.
[48] *Ibid.*
[49] Michigan Part B Phase III State Systemic Improvement Plan, April 2017.

Education of Young Children Ages Three to Five Years

This subsection addresses academic outcomes for children with IEPs, their educational settings, and feedback from focus group participants.

Achievement Outcomes for Children with IEPs (Three to Five Years of Age)

One indicator in MDE's SPP relates to the achievement of young children with disabilities in three areas: appropriate behavior, acquisition and use of knowledge and skills, and positive social/emotional skills. In each of these three categories, calculations are made of the percentage of children in two areas: (1) children who entered an early childhood program below developmental expectation for their age, but who have substantially increased developmentally by age six when they exit a program, and (2) children functioning within expectations by age six or have attained those expectations by the time they exit the program. The percentages of district children meeting standards and the state's targets on each are shown in Exhibit 3a.[50]

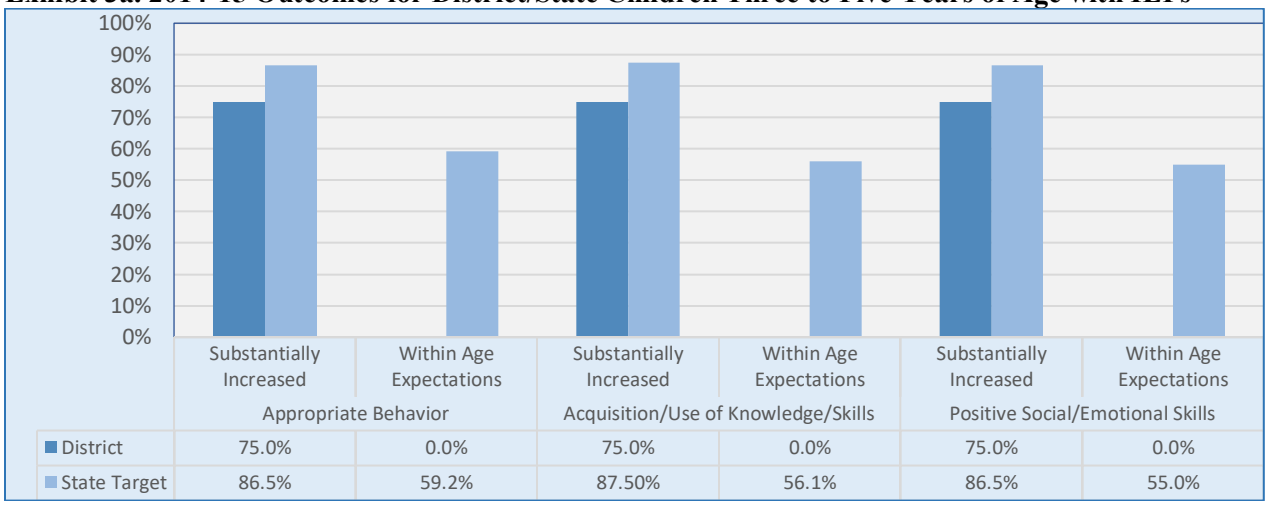
Substantially Increased Skills

This area measures DPSCD children who entered an early childhood program below developmental expectation for their age, but who substantially increased developmentally by age six when they exited the program. In each of the three categories (appropriate behavior, acquisition and use of knowledge/skills, and positive social/emotional skills), MDE's public report for 2015-16 showed that none of DPSCD's children met state standards. (See exhibit 3a.) These outcomes raise questions about the accuracy of the district's data for FY 2015.

Functioning Within Age Expectations

For children who were functioning within expectations by six years of age or had attained those expectations by the time they exited the program, 75 percent of children met state standards in all three categories. These outcomes also raise concerns about the accuracy of the data since all three categories showed identical results.

Exhibit 3a. 2014-15 Outcomes for District/State Children Three to Five Years of Age with IEPs



[50] Retrieved from SpecialEducationPublicReporting-IndicatorReportSummary.pdf.

Educational Settings of Young Children Three to Five Years of Age

Studies have shown that when children with disabilities are included in regular classroom settings, they demonstrate higher levels of social play, are more likely to initiate activities, and show substantial gains in key skills—cognitive skills, motor skills, and self-help skills. Participating in activities with typically developing peers allows children with disabilities to learn through modeling, and this learning helps them prepare for the real world. Researchers have found that typically developing children in inclusive classrooms are also better able to accept differences, are more likely to see their classmates achieving despite their disabilities, and they are more aware of the needs of others.[51]

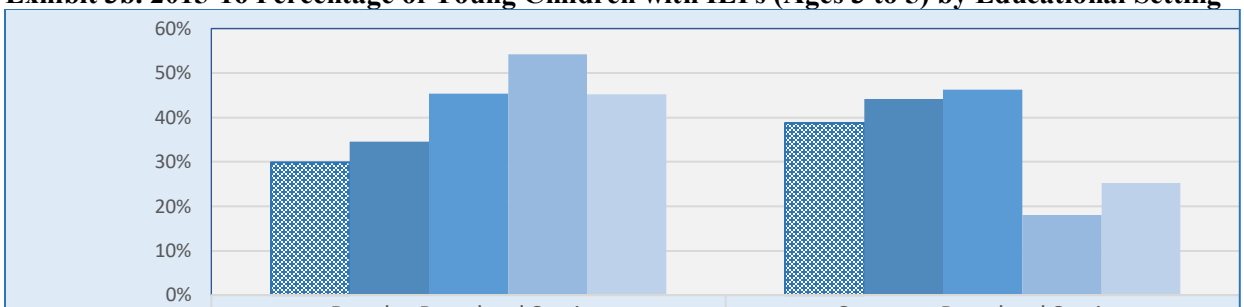
The importance of inclusive settings is underscored by a federal requirement that state performance-plan indicators include the extent to which young children (three to five years of age) receive most of their services in regular early childhood programs or in separate settings.

District Educational Setting Rates

Data in exhibit 3b show DPSCD percentages of three to five-year old children with disabilities who were educated in various educational settings.

- ***Majority of Time in Early Childhood.*** Overall, 29.9 percent of all DPSCD children with IEPs were educated most of the school day in a regular early childhood class. This figure is lower than Wayne RESA's 34.5 percent rate, the state's 45.3 percent rate, the state's 54.2 percent target, and the nation's 45.2 percent rate.
- ***Separate Class or School.*** Some 38.7 percent of all district children were educated most of the day in separate classes/schools apart from their typical peers. This figure was lower than Wayne RESA's 44.1 percent and the state's 46.3 percent average. Nonetheless, DPSCD's percentage is larger than the state's 18.1 percent target and the nation's 25.2 percent average.

Exhibit 3b. 2015-16 Percentage of Young Children with IEPs (Ages 3 to 5) by Educational Setting



	Regular Preschool Setting	Separate Preschool Setting
DPSCD	29.9%	38.7%
Wayne RESA	34.5%	44.1%
State	45.3%	46.3%
State Target	54.2%	18.1%
Nation	45.2%	25.2%

[51] Ronnie W. Jeter, The Benefits of Inclusion in Early Childhood Programs at http://www.turben.com/article/83/274/The-Benefits-of-Inclusion-in-Early-Childhood-Programs

Student Achievement on the NAEP and Statewide Assessments for Grades 3-12

Beginning in 2015, USDE developed a determination rating based on results defined in the accountability framework described earlier. Two matrices were used for this purpose--with 50 percent of the ratings based on results and 50 percent based on compliance. The results component is calculated using the following indicators:

- Fourth/eighth graders participating in regular statewide assessments in reading and math;
- Fourth/eighth graders scoring at or above basic levels of proficiency in reading and math on the National Assessment of Educational Progress (NAEP);
- Fourth/eighth graders included in NAEP testing in reading and math;
- Students exiting school by graduating with a regular high school diploma; and
- Students exiting school by dropping out.[52]

This subsection presents achievement data for Detroit students on NAEP, as well as performance data for DPSCD students with disabilities on statewide assessments. In addition, graduation and dropout rates are assessed.

NAEP Achievement Rates for Fourth, Eighth, and Twelfth Grade Students with IEPs

In partnership with the National Assessment Governing Board and the Council of the Great City Schools, the Trial Urban District Assessment (TUDA) was created in 2002 to support improvements in student achievement in the nation's largest urban school districts. In 2015, 21 urban school districts voluntarily participated in TUDA and can track achievement by subgroup on a single comparable assessment. Fortunately, DPSCD participates in TUDA, so district achievement rates on NAEP can be compared with state and national averages among students with disabilities and with other major city school districts.[53]

Data in exhibits 3c through 3f show the percentage of students with disabilities in 2015 who scored basic/above in reading and math for all large city (TUDA) districts and the nation.[54] The exhibits also show the percentage point differences between 2015 and 2009 for the TUDA districts that participated in 2009.

Reading: Grade 4

Fourth grade reading results for students with disabilities showed that some 23 percent scored at or above basic levels in all TUDA districts, a decrease of 1 percentage point from 2009. Nationally, some 33 percent of students with disabilities scored at this level.

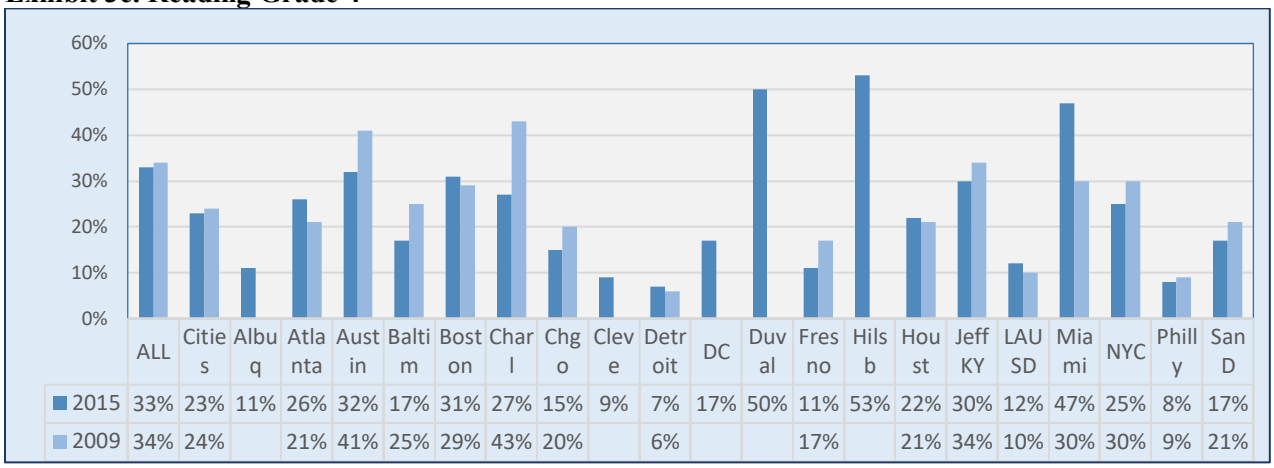
[52] For a full explanation of ED's methodology, see How the Department Made Determinations under Section 616(d) of the Individuals with Disabilities Education Act in 2015: Part B http://www2.ed.gov/fund/data/report/idea/partbspap/2015/2015-part-b-how-determinations-made.pdf

[53] The Nation's Report Card, retrieved from http://www.nationsreportcard.gov/.

[54] TUDA scores include students who are Section 504 qualified. TUDA 2003-2013 results were retrieved from http://www.advocacyinstitute.org/blog/; and 2015 results were retrieved from http://nces.ed.gov/nationsreportcard/naepdata/.

In Detroit, 7 percent of students with disabilities scored basic/above, an increase of 1 percentage point from 2009. In 2015, TUDA averages ranged from 53 percent basic or above to 7 percent. Of the large cities, the highest averages were posted by Hillsborough County (53 percent), and Duval County (50 percent), and Miami-Dade County (47 percent). Miami-Dade County's average increased the most, 17 points.

Exhibit 3c. Reading Grade 4



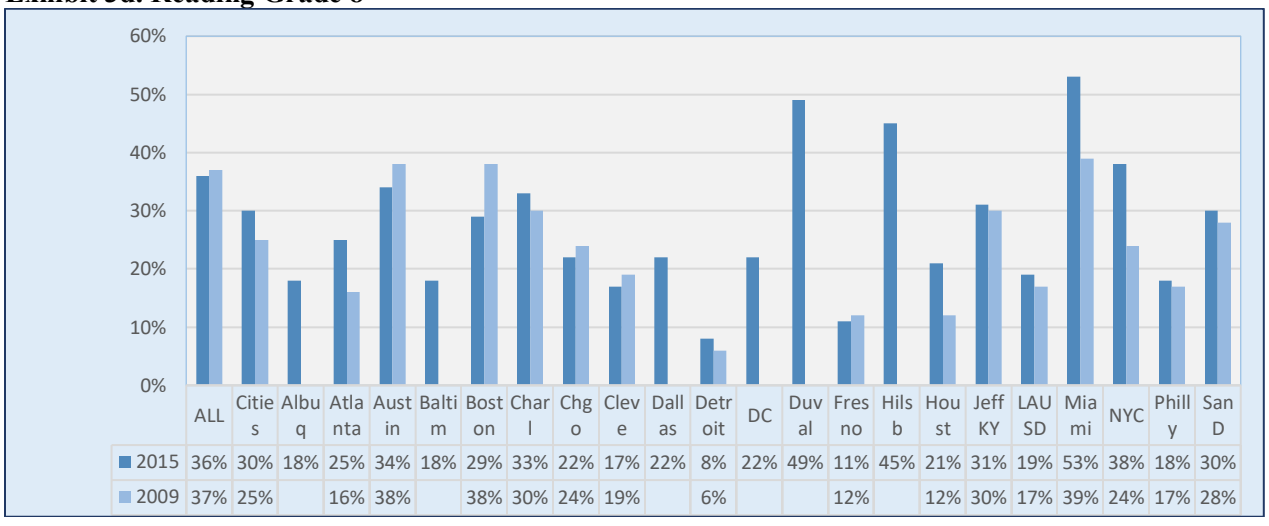
	ALL	Cities	Albuq	Atlanta	Austin	Baltim	Boston	Charl	Chgo	Cleve	Detroit	DC	Duval	Fresno	Hilsb	Houst	Jeff KY	LAUSD	Miami	NYC	Philly	SanD
2015	33%	23%	11%	26%	32%	17%	31%	27%	15%	9%	7%	17%	50%	11%	53%	22%	30%	12%	47%	25%	8%	17%
2009	34%	24%		21%	41%	25%	29%	43%	20%		6%			17%		21%	34%	10%	30%	30%	9%	21%

Reading: Grade 8

Some 36 percent of eighth grade students with disabilities scored at or above basic levels of proficiency in reading nationally in 2015 and some 30 percent scored at this level in TUDA districts. The nation's average fell by 1 percentage point from 2009, while TUDA districts increased their average by 5 percentage points.

In Detroit, 8 percent of students with disabilities scored at basic levels or above, an increase of 2 percentage points from 2009. In 2015, TUDA averages ranged from 53 percent to 8 percent. The highest averages were posted by Miami-Dade County (53 percent) and Duval County (49 percent). Miami-Dade County and New York City's average scores increased the most, 14 percentage points.

Exhibit 3d. Reading Grade 8



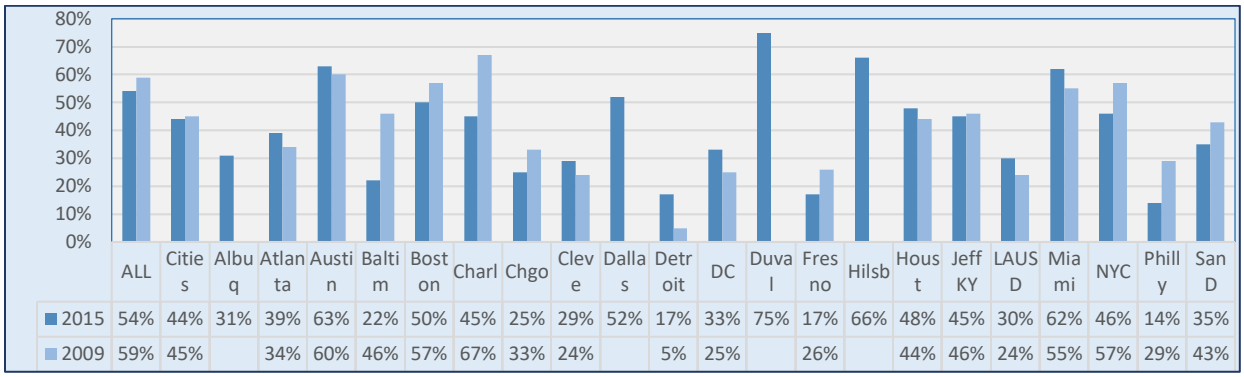
	ALL	Cities	Albuq	Atlanta	Austin	Baltim	Boston	Charl	Chgo	Cleve	Dallas	Detroit	DC	Duval	Fresno	Hilsb	Houst	Jeff KY	LAUSD	Miami	NYC	Philly	SanD
2015	36%	30%	18%	25%	34%	18%	29%	33%	22%	17%	22%	8%	22%	49%	11%	45%	21%	31%	19%	53%	38%	18%	30%
2009	37%	25%		16%	38%		38%	30%	24%	19%		6%			12%		12%	30%	17%	39%	24%	17%	28%

Math: Grade 4

In fourth grade math, some 54 percent of students with disabilities scored at or above basic levels of proficiency nationally. Some 44 percent of students with disabilities scored at this level in TUDA districts. Students nationally decreased by 5 percentage points over the period, while students in TUDA districts decreased by 1 percentage point.

In Detroit, 17 percent of fourth graders with disabilities scored basic/above, an increase of 12 percentage points over 2009—the most of any city. In 2015, large city averages ranged from 75 percent to 14 percent. The highest averages were posted by Duval County (75 percent), Hillsborough County (66 percent), Austin (63 percent), and Miami-Dade County (62 percent).

Exhibit 3e. Math Grade 4



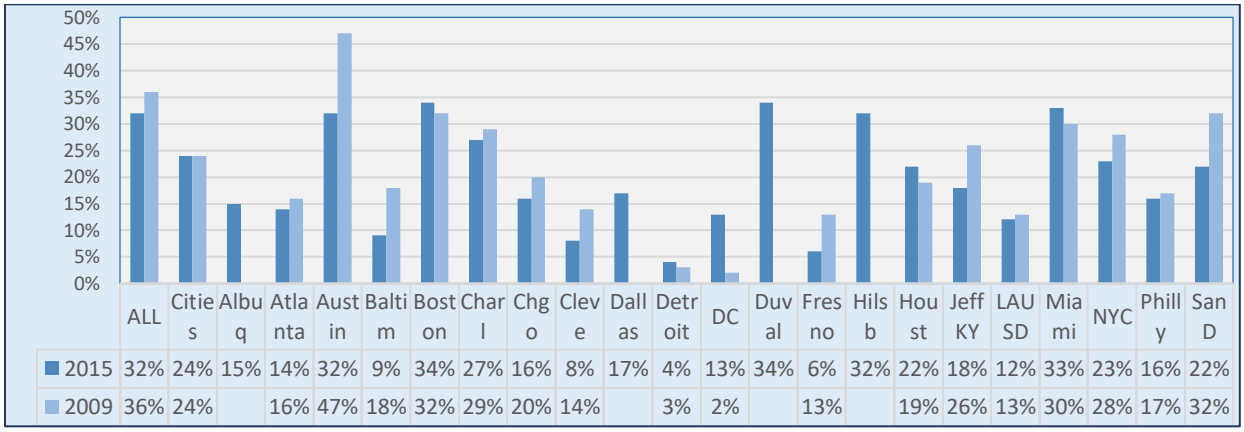
	ALL	Cities	Albuq	Atlanta	Austin	Baltim	Boston	Charl	Chgo	Cleve	Dallas	Detroit	DC	Duval	Fresno	Hilsb	Houst	Jeff KY	LAUSD	Miami	NYC	Philly	SanD
2015	54%	44%	31%	39%	63%	22%	50%	45%	25%	29%	52%	17%	33%	75%	17%	66%	48%	45%	30%	62%	46%	14%	35%
2009	59%	45%		34%	60%	46%	57%	67%	33%	24%		5%	25%		26%		44%	46%	24%	55%	57%	29%	43%

Math: Grade 8

In eighth grade math, some 32 percent of students with disabilities nationally and 24 percent in TUDA districts scored at basic levels or above. Since 2009, the nation's rate fell by 4 percentage points, and TUDA's rate remained the same.

In Detroit, 4 percent of students with disabilities scored basic/above, an increase of 1 percentage point over 2009. In 2015, large city averages ranged from 34 percent to 4 percent. Of the large cities, the highest averages were posted by Boston and Duval County (34 percent) and Miami-Dade County (33 percent). The District of Columbia increased the most, 11 percentage points.

Exhibit 3f. Math Grade 8



	ALL	Cities	Albuq	Atlanta	Austin	Baltim	Boston	Charl	Chgo	Cleve	Dallas	Detroit	DC	Duval	Fresno	Hilsb	Houst	Jeff KY	LAUSD	Miami	NYC	Philly	SanD
2015	32%	24%	15%	14%	32%	9%	34%	27%	16%	8%	17%	4%	13%	34%	6%	32%	22%	18%	12%	33%	23%	16%	22%
2009	36%	24%		16%	47%	18%	32%	29%	20%	14%		3%	2%		13%		19%	26%	13%	30%	28%	17%	32%

Statewide Assessments[55]

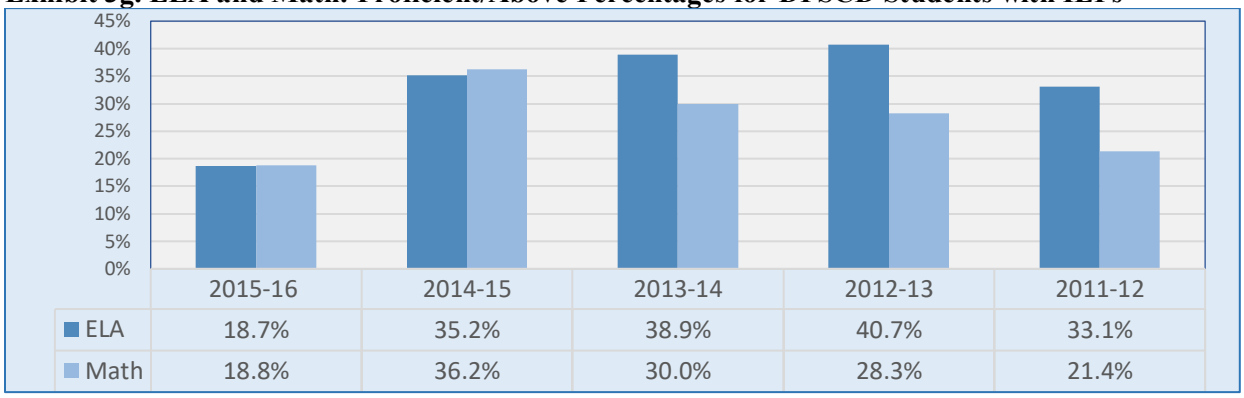
MDE's Michigan Student Test of Educational Progress, or M-STEP, is a summative assessment and is administered to students in the following grades and subjects: English language arts and mathematics in grades 3–8; science in grades 4, 7 and 11; and social studies in grades 5, 8 and 11. The Michigan Merit Examination (MME) is a general assessment for students in grade 11. The MME includes a free SAT with essay and M-STEP ELA and mathematics assessment; M-STEP science and M-STEP social studies components; and ACT WorkKeys.

Statewide English Language Arts (ELA) and Math Assessments

Exhibit 3g shows the percentages of students with disabilities who scored proficient or above on statewide ELA and math assessments from 2011-12 to 2015-16, when MDE changed its assessment.

- ***English Language Arts.*** In 2012-13, Detroit students with IEPs increased their rate of proficient/above scores by 7.6 percentage points from the previous year's 33.1 percentage. This progress stopped in 2013-14 when the percentage dropped from 40.7 percent to 38.9 percent, and then dropped again in 2014-15 to 35.2 percent. Under a new assessment in 2015-16, the rate dropped to 18.7 percent.
- ***Math.*** Between 2011-12 and 2014-15, students with IEPs consistently increased their rate of proficient or above from 21.4 percent to 36.2 percent. The rate dropped to 18.8 percent with the new assessment in 2015-16.

Exhibit 3g. ELA and Math: Proficient/Above Percentages for DPSCD Students with IEPs



	2015-16	2014-15	2013-14	2012-13	2011-12
ELA	18.7%	35.2%	38.9%	40.7%	33.1%
Math	18.8%	36.2%	30.0%	28.3%	21.4%

MDE's Alternate Assessment

I-Access is Michigan's alternate assessment system, which consists of three assessments designed for students who have (or function as if they have) a significant cognitive impairment. For such students to participate in this system, the IEP team must determine that general assessments, even with accommodations, are not appropriate. Under the *Every Student Succeeds Act*, rather than placing a cap on alternate assessments at the district level, the law established a

[55] Achievement data were not provided by DPSCD. Information for this section was retrieved from the CDE website. The district's data was retrieved from http://ayp.cde.ca.gov/reports/Acnt2015/2015APRDstAYPReport.aspx?cYear=&allCds=3467439&cChoice=AYP14b and state data were retrieved from http://ayp.cde.ca.gov/reports/acnt2015/2015APRStAYPReport.aspx.

state cap of 1.0 percent in the number of participating students. A state may not pass on this cap to LEAs and prohibit them from assessing more than 1.0 percent of its students using an alternate assessment. However, LEAs exceeding this participation rate must provide justification for this outcome, and states must publish the LEA's justification and provide oversight to LEAs that exceed the 1.0 rate.

Based on data MDE collected from spring 2017 assessments, the current rate of Michigan students taking an alternate assessment is 2.4 percent in ELA, 2.4 percent in math, and 2.3 percent in science. As allowable under ESSA, MDE asked the U.S. Department of Education to waive the 1.0 percent cap for the state's 2018 assessments. The waiver is required to:

- Demonstrate that Michigan has tested at least 95 percent of all students and 95 percent of students with disabilities across all summative assessments; and
- Provide assurances that LEAs contributing to the state's exceeding the 1.0 percent cap have adhered to MDE's participation guidelines and address any disproportionality in any sub-group of students taking the alternate assessment.

DPSCD Practice

MDE's 2015-16 report for the district showed that fewer than 95 percent of students with IEPs participated in the statewide assessment in the prior school year (92.39 percent for ELA and 90.65 percent for math).[56] Furthermore, according to data MDE provided to the Council team, the district significantly exceeded the 1.0 percent rate for students using an alternate assessment (5.8 percent in ELA, 5.7 percent in math; and 5.5 percent in science.) As a result, district IEP teams will likely be monitored to determine their adherence to MDE's alternate assessment participation guidelines and the district may have to address any disproportionality by student subgroup. Although some students may be from other districts who attend DPSCD's specialized programs, the number is not likely to substantially reduce the percentage of students taking an alternate assessment.

Educational Settings for Students with Disabilities

Research has consistently shown a positive relationship between inclusive instruction and better outcomes for students with disabilities, including higher academic performance, higher likelihood of employment, higher participation rates in postsecondary education, and greater integration into the community. The 10-year National Longitudinal Transition Study-2 (NLTS 2) described the characteristics, experiences, and outcomes of a nationally representative sample of more than 11,000 youth ages 13 through 16 who were receiving special education services in grade seven or above when the study began in 2001. The study found that, while more time spent in general education classrooms was associated with lower *grades* for students with disabilities compared to their non-disabled peers, students who spent more time in general settings were closer to grade level on standardized math and language *tests* than were students with disabilities who spent more time in separate settings.[57] Research also shows that including students with a range of

[56] Retrieved from MDE Special Education Public Reporting – Indicator Report Summary.
[57] Review of Special Education in the Houston Independent School District, Thomas Hehir & Associates Boston, Massachusetts, page 25, retrieved at

disabilities in general education classes did not affect the achievement of their non-disabled peers.[58]

Similar results were found in a comprehensive study of school districts in Massachusetts. There, students with disabilities who were in full-inclusion settings (80 percent or more of the school day in general education classrooms) appeared to outperform similar students who were not included to the same extent in general education classrooms with their non-disabled peers. On average, these students earned higher scores on the statewide assessment (MCAS), graduated high school at higher rates, and were more likely to remain in their local school districts longer than students who were educated in substantially separate placements 40 percent or less of the day in a general education classroom. These findings were consistent across elementary, middle, and high school years, as well as across subject areas.[59]

MDE's systemic improvement plan reinforces the importance of effective general education and supports in improving educational outcomes for students with disabilities.

> [S]tudents with [IEPs] need a high-quality general education environment in order to succeed. Special education can provide effective support services; however, this is in combination with a general education environment that successfully addresses various needs of all learners through a differentiated response system.[60]

The SPP tracks students educated in one of three educational settings and sets targets for each: (1) in general education 80 percent or more of the day, (2) in general education less than 40 percent of the day, i.e., in separate classes, and (3) separate schools. States are expected to collect data on a fourth educational setting (in general education between 79 percent and 40 percent of the time), but the SPP indicator does not monitor this setting.

Comparison of Rates for District, State, and Nation

Data in exhibit 3h show the composition of district students with IEPs in the four educational settings in 2017-18. Data compare DPSCD with Wayne RESA, Michigan, and national rates.[61]

- ***In General Education At least 80 Percent of the Tim***e. The district's 54 percent rate for students in this setting is 8 percentage points lower than the state target, and lower than

http://www.houstonisd.org/cms/lib2/TX01001591/Centricity/Domain/7946/HISD__Special_Education_Report_2011_Final.pdf.

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

[59] Thomas Hehir & Associates (2014, August) Review of Special Education in the Commonwealth of Massachusetts: A Synthesis Report, Boston, Massachusetts, retrieved at http://www.doe.mass.edu/sped/hehir/2014-09synthesis.pdf

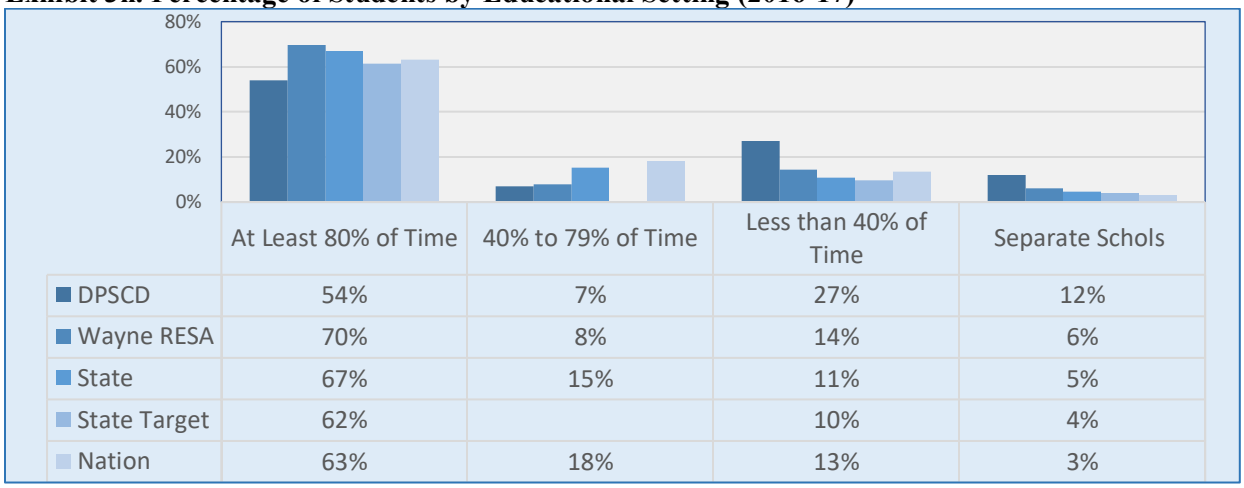
[60] Retrieved from apr-2013b-mi-indicator17-compiled-with-appendices-biblio-bkmrks-phasei.pdf at page 6.

[61] State, Wayne RESA, and DPSCD 2016-17 rates were retrieved from MI School Data at https://www.mischooldata.org/SpecialEducationEarlyOn2/DataPortraits/DataPortraitsSummary.aspx?Common_Locations=1-D,1078,119,0&Common_SchoolYear=18&Common_SpecEdReportCategory=EducationalSetting6to21&Common_SpecEdTestingGroup=GenEd80. National data were retrieved from 2016-17 Part B Child Count and Educational Environments (Nov. 1, 2017) at https://www2.ed.gov/programs/osepidea/618-data/static-tables/index.html#partb-cc.

Wayne RESA, the state, and the nation (70 percent, 67 percent, and 63 percent, respectively).

- ***In General Education Between 40 and 79 percent of the Time.*** The district's 7 percent rate for this setting is close to Wayne RESA and lower than the state and nation (15 percent and 18 percent, respectively). There is no state target for this environment.
- ***In General Education Less than 40 Percent of the Time.*** Generally considered to be a self-contained special education class setting, the district's 27 percent rate is 17 percentage points higher than the state target, Wayne RESA, the state average, and the national average (14.3 percent, 10.9 percent, and 13.4 percent, respectively). When excluding students from other districts who attend DPCSD, DPCSD's rate increases slightly to 28 percent.
- ***Separate Schools.*** The district's 12 percent of students with disabilities who attended separate schools is 8 percentage points higher than the state level, and higher than Wayne RESA, the state, and the national average (18 percent, 13 percent, and 3 percent, respectively). Excluding students from other districts, DPSCD's rate decreases to 9 percent.

Exhibit 3h. Percentage of Students by Educational Setting (2016-17)



	At Least 80% of Time	40% to 79% of Time	Less than 40% of Time	Separate Schols
DPSCD	54%	7%	27%	12%
Wayne RESA	70%	8%	14%	6%
State	67%	15%	11%	5%
State Target	62%		10%	4%
Nation	63%	18%	13%	3%

Based on 2016-17 data, MDE notified the district in a May 15, 2017 letter that the district's percentages of students in various educational settings did not meet state thresholds. Although the state did not require any immediate action, the letter indicated that the district's data for the 2017-18 school would be reviewed. If DPSCD continues to have data that does not meet established state targets, MDE indicated that the district may be scheduled for a monitoring visit later. State representatives indicated that MDE was expecting RESA to become more active in executing its oversight responsibilities in monitoring school districts receiving IDEA and state funds through the intermediate school district.

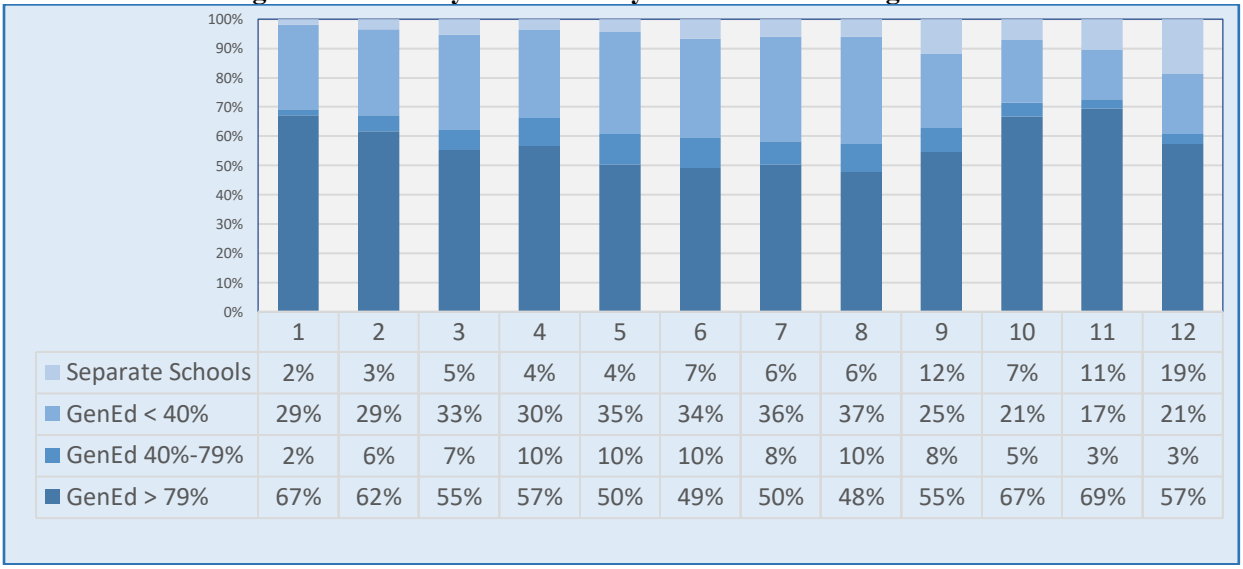
Educational Setting Rates by Grade

Data in exhibit 3i show that the percentage of secondary grade students educated in separate classes (in general education less than 40 percent of the time) decreases from 37 percent (grade 8) to 21 percent (grade 12). The percentage of students in separate center schools increases from 6 percent (grade 8) to 19 percent (grade 12). A relatively small percentage of students are educated in general education classes between 40 percent and 79 percent of the time. As shown in exhibit 3j, one would expect that a higher proportion of students would be served in the 40 to 79 percent

setting compared to state and national rates. No discernable pattern exists in the least restrictive environment (general education at least 80 percent of the time), which has higher percentages at both lower and upper grades.

- ***General Education At least 80 Percent of the Time.*** Rates begin to decrease from first grade's 67 percent to 48 percent in grade 8. The rates then increase at the secondary grade level from 55 percent (grade 9) to 69 percent (grade 11).
- ***General Education Between 40 and 79 percent of the Time***. Rates increase from first grade's 2 percent to 19 percent in grade 8. At the secondary grade level, the rates decrease from 8 percent (grade 9) to 3 percent (grade 12).
- ***General Education Less than 40 Percent of the Time.*** Rates increase from 29 percent (grades 1 and 2) to 37 percent (grade 8). At the secondary grade level, the rates decrease from 25 percent (grade 9) to 21 percent (grade 12).
- ***Separate Schools.*** Rates increase through the elementary school grades, from 2 percent (kindergarten) to 6 percent (grade 8). The rate jumps to 12 percent (grade 9) and to 19 percent (grade 12, which includes students remaining in school for secondary transition services).

Exhibit 3i. Percentage of Students by Grade and by Educational Setting



	1	2	3	4	5	6	7	8	9	10	11	12
Separate Schools	2%	3%	5%	4%	4%	7%	6%	6%	12%	7%	11%	19%
GenEd < 40%	29%	29%	33%	30%	35%	34%	36%	37%	25%	21%	17%	21%
GenEd 40%-79%	2%	6%	7%	10%	10%	10%	8%	10%	8%	5%	3%	3%
GenEd > 79%	67%	62%	55%	57%	50%	49%	50%	48%	55%	67%	69%	57%

Educational Setting Rates by Disability Areas

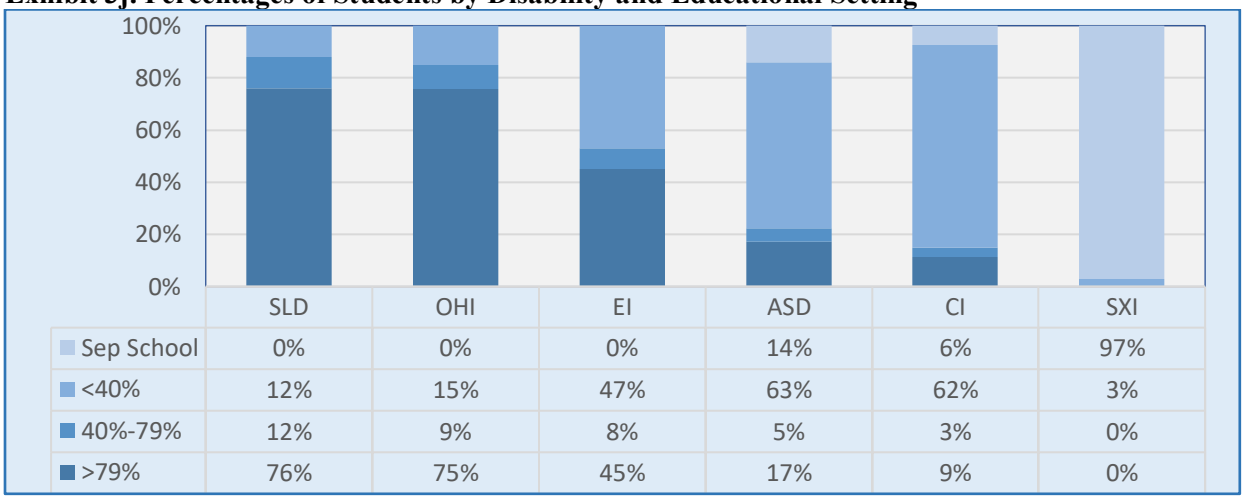
Data in exhibit 3j show the percentages of district students with IEPs in six major disability areas and severe multiple impairments (SXI) by educational setting. In the area of speech/language impairments, 99 percent of students were educated in general education classes at least 80 percent of the time. Only two other disability areas, specific learning disabilities and other health impairments, show more students educated inclusively in this setting (76 percent and 75 percent, respectively). Students with autism, cognitive impairment, and severe multiple impairment are educated outside of general education most of the school day.

- ***General Education At least 80 Percent of the Time.*** Students with a specific learning

disability and other health impairment spend the most time in this setting (76 percent and 75 percent, respectively). They are followed by students with an emotional impairment (45 percent). Rates for students with autism, cognitive impairments, and severe multiple impairments are 17 percent, 9 percent, and 0 percent, respectively.

- ***General Education Between 40 and 79 percent of the Time***. Small percentages of students spend their time in this environment, ranging from 12 percent (specific learning disability) to 0 percent (and severe multiple impairment).
- ***General Education Less than 40 Percent of the Time.*** Disability categories with the largest rates of students with IEPs educated in separate classes are autism and cognitive impairment (63 percent and 62 percent, respectively). Emotional impairment has the next highest rate (47 percent). Students with a specific learning disability, other health impairment, or severe multiple impairment have the smallest rates (12 percent, 15 percent, and 3 percent, respectively.
- ***Separate Schools.*** With a rate of 97 percent, almost all students with severe multiple impairments are educated in separate schools or centers. Other students educated in this restrictive setting are those with autism and cognitive impairments (6 percent and 14 percent, respectively). Note that while some students with emotional impairments attend one of the district's two therapeutic day schools, district data did not include numbers for these students.

Exhibit 3j. Percentages of Students by Disability and Educational Setting



	SLD	OHI	EI	ASD	CI	SXI
Sep School	0%	0%	0%	14%	6%	97%
<40%	12%	15%	47%	63%	62%	3%
40%-79%	12%	9%	8%	5%	3%	0%
>79%	76%	75%	45%	17%	9%	0%

Educational Setting Rates by Race/Ethnicity

Data on the four educational settings by race/ethnicity are shown below (exhibit 3k). Risk ratio data by race/ethnicity are shown in Exhibit 3l.

By Percentages of Students

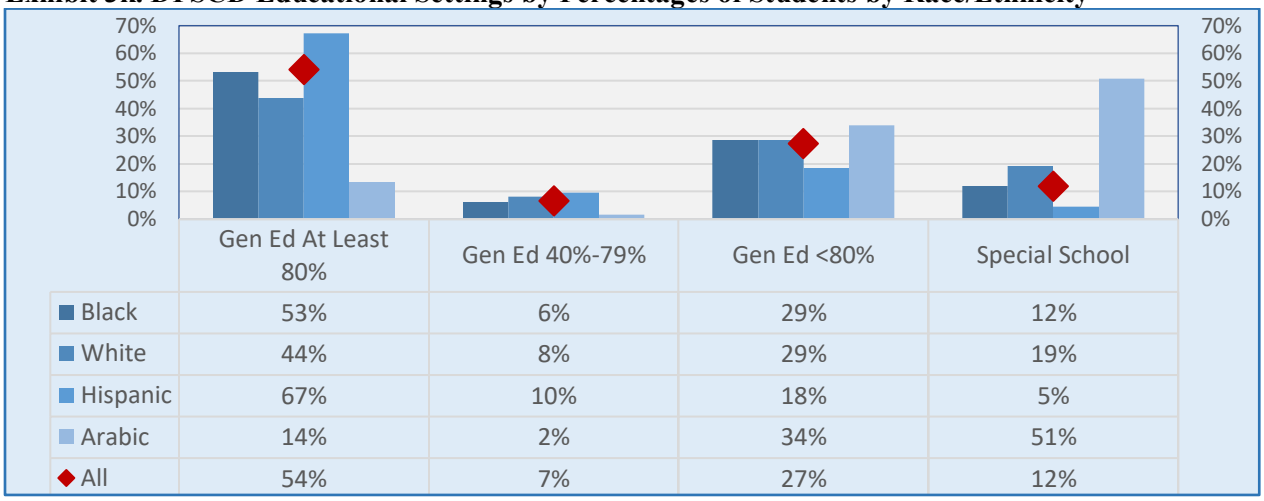
The following summarizes the percentages of students with IEPs by race/ethnicity in each of the three SPP-measured educational settings.

- ***General Education At least 80 Percent of the Time.*** Compared to 54 percent of all students with IEPs, Hispanic students are educated in this setting at a higher rate (67 percent), and

Arabic students at a much lower rate (14 percent).

- ***General Education Less than 40 Percent of the Time.*** Compared to 27 percent of all students with IEPs, Arabic students are educated in this setting at a higher rate (34 percent), and Hispanic students at a much lower rate (18 percent)
- ***Separate Schools.*** Compared to 12 percent for all students with IEPs, Arabic students are educated in this setting at a much higher rate (51 percent), and Hispanic students at a much lower rate (5 percent).

Exhibit 3k. DPSCD Educational Settings by Percentages of Students by Race/Ethnicity

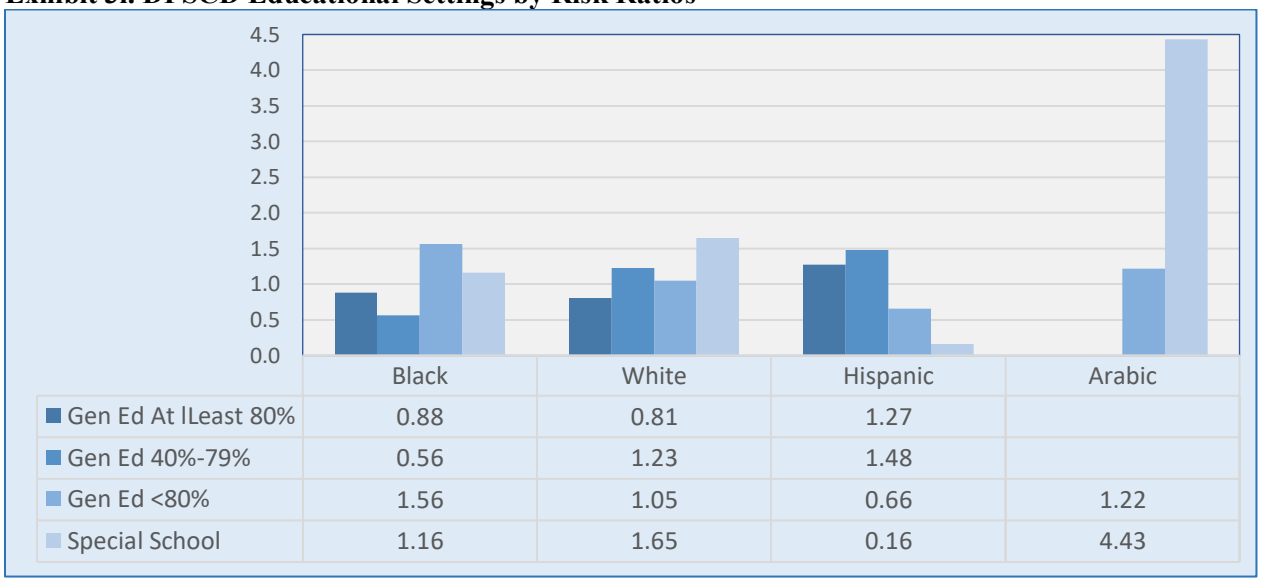


	Gen Ed At Least 80%	Gen Ed 40%-79%	Gen Ed <80%	Special School
Black	53%	6%	29%	12%
White	44%	8%	29%	19%
Hispanic	67%	10%	18%	5%
Arabic	14%	2%	34%	51%
All	54%	7%	27%	12%

By Risk Ratios

With one exception, students with IEPs from one racial/ethnic group are not more likely to be placed in any educational settings than other students with IEPs. The exception is for Arabic students, who are 4.43 times more likely than all others to receive instruction in a separate school.

Exhibit 3l. DPSCD Educational Settings by Risk Ratios



	Black	White	Hispanic	Arabic
Gen Ed At lLeast 80%	0.88	0.81	1.27	
Gen Ed 40%-79%	0.56	1.23	1.48	
Gen Ed <80%	1.56	1.05	0.66	1.22
Special School	1.16	1.65	0.16	4.43

To determine the extent to which out-of-district Arabic students affected their disproportionately high placement rates in special schools, we calculated district data without these students. Overall, 21 of 59 Arabic students are from other districts. Among DPSCD's Arabic students who reside in the district, 36 percent are educated in special schools; and they are 3.9 times more likely than other students with IEPs to be educated in this setting. Thus, although their risk ratio was lower than the 4.43 figure that includes these students, their placement risk continued to be high. The team understands that center-based programs attract families, so the rates may be elevated for that reason.

Suspension and Expulsion Rates

Another critical issue that affects the achievement of students with disabilities is time out of school due to suspensions. Indicator 4 of the state performance plan measures out-of-school suspensions for more than 10 days, as well as suspensions of students with disabilities by race/ethnicity. Under U.S. Department of Education's regulation, which is supposed to go into effect in the 2018-19 school year (but may be postponed), significant disproportionality is to be measured (using a risk ratio and alternate risk ratio for small cell numbers) on:

- Out of school suspensions (OSS) of 1-10 days, and more than 10 days;
- In-school suspensions (ISS) of 1-10 days, and more than 10 days;
- Removals to an interim alternative education setting; and
- Removals by a hearing officer.

The information below summarizes OSSs for students with and without IEPs. The district did not provide requested data on ISSs.

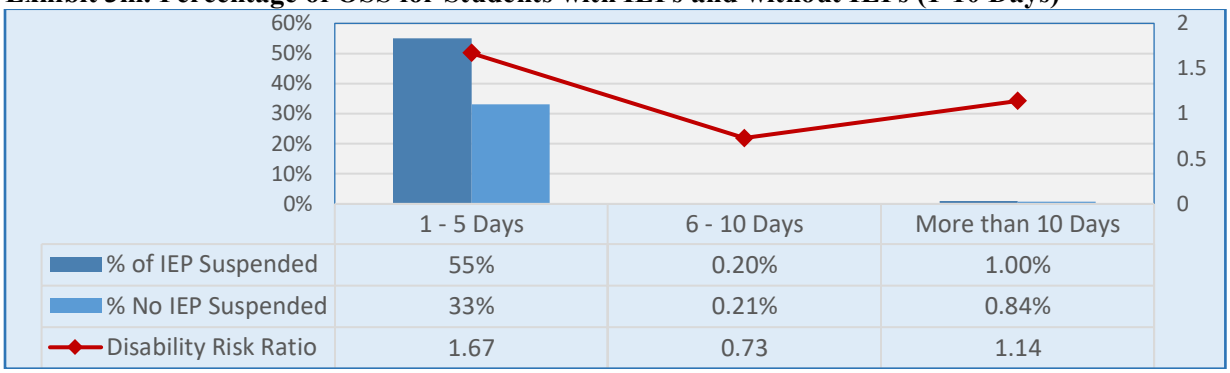
Out-of-School Suspensions

The information below for 2017-18 describes the district's OSSs by grade and by race/ethnicity for students with and without IEPs for periods of 1-10 days and more than 10 days. In each category, students with IEPs were suspended at rates that were higher than students without IEPs, and the rates increased significantly at seventh grade. Also, African American students with IEPs had suspension rates and risks of suspension far higher than other students with IEPs. In addition, focus group participants reported that they thought suspensions were being under-reported because some students were being sent home "unofficially" and not recorded.

Number of OSS Days (Percentages and Disability Risk Ratios)

Data in exhibit 3m shows the percentage of students with and without IEPs who received an OSS for 1 to 5 days, 6 to 10 days, and more than 10 days. Small percentages of both groups received an OSS for more than five school days. Compared to students without IEPs, larger percentages of students with IEPs have suspensions of 1 to 5 days (55 percent to 33 percent, respectively). Using a risk ratio, students with disabilities were not any more likely than their typical peers to receive an OSS for any number of days. The highest risk among students with disabilities (1.67) was for OSSs (consecutive or cumulative) of less than six school days.

Exhibit 3m. Percentage of OSS for Students with IEPs and without IEPs (1-10 Days)



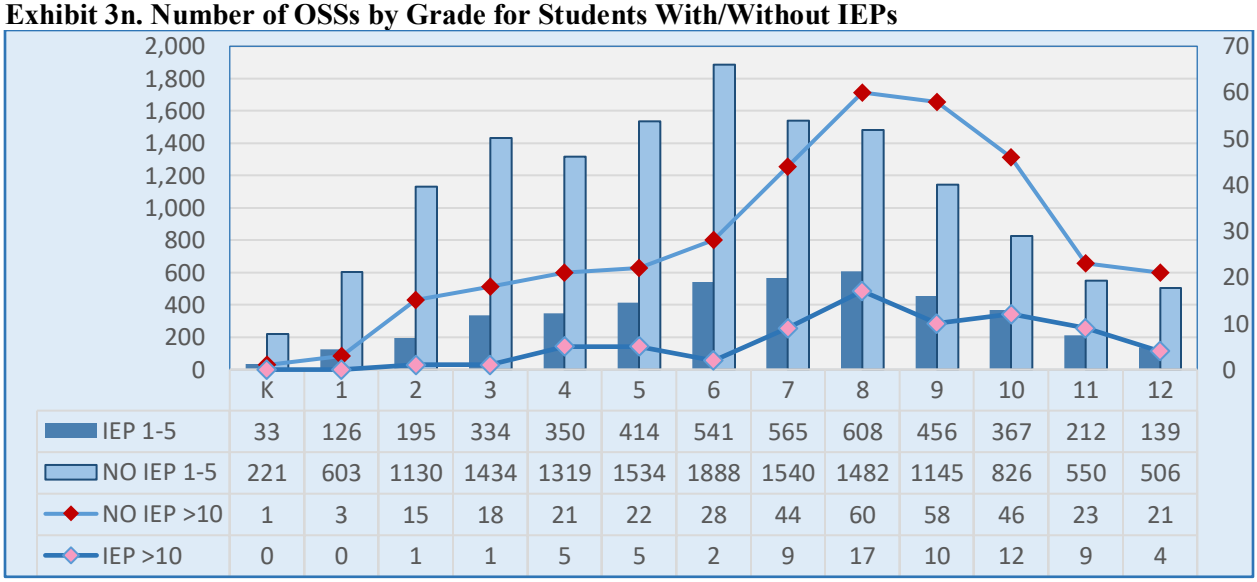
	1 - 5 Days	6 - 10 Days	More than 10 Days
% of IEP Suspended	55%	0.20%	1.00%
% No IEP Suspended	33%	0.21%	0.84%
Disability Risk Ratio	1.67	0.73	1.14

Number of OSSs by Grade and Length

Data in exhibit 3n show the number of OSSs from 1 to 5 and over 10 school days for students with and without IEPs. Figures for OSSs of 6 to 10 days are not shown since they are small: 13 for students with IEPs – with more high school students (8) than elementary school students (5); 65 students without IEPs – with more for high school students (66) than elementary school students (23).

- OSSs of 1 to 5 Days
  - ***IEP.*** OSSs increase from kindergarten to sixth grade, and then taper off through high school.
  - ***No IEP.*** OSSs increase from kindergarten through eighth grade, and then begin to taper off in ninth grade.
- ***OSS of More than 10 Days.*** The pattern among students with and without IEPs is more similar for OSSs of more than 10 days. Among both groups of students, suspensions increase from kindergarten, reach their highest numbers in grade 8, and then steadily decrease through high school.

Exhibit 3n. Number of OSSs by Grade for Students With/Without IEPs



	K	1	2	3	4	5	6	7	8	9	10	11	12
IEP 1-5	33	126	195	334	350	414	541	565	608	456	367	212	139
NO IEP 1-5	221	603	1130	1434	1319	1534	1888	1540	1482	1145	826	550	506
NO IEP >10	1	3	15	18	21	22	28	44	60	58	46	23	21
IEP >10	0	0	1	1	5	5	2	9	17	10	12	9	4

OSSs by Race/Ethnicity Percentage and Risk Ratio

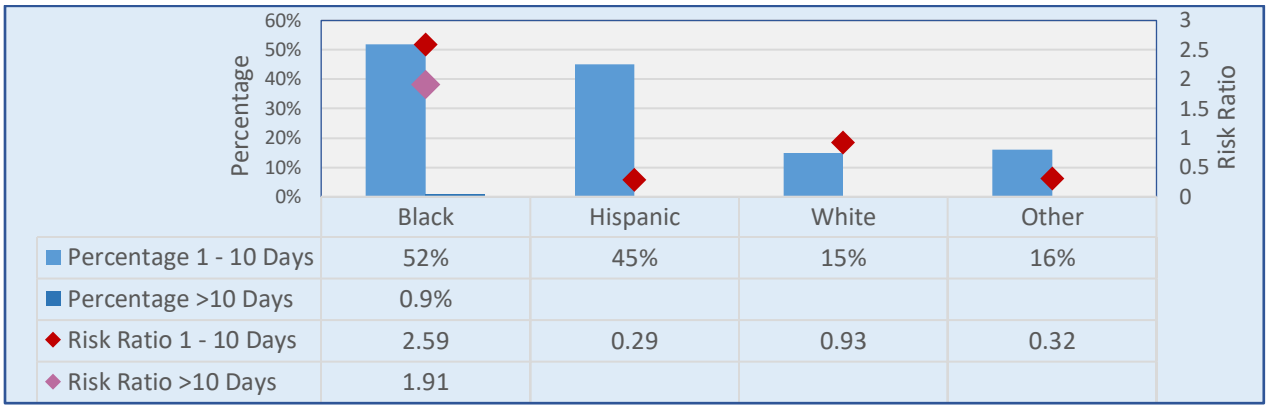
Data in exhibit 3o show OSSs among students with disabilities by length of suspension, race/ethnicity, and risk ratios by race/ethnicity. Cells without data had very low numbers.

With 52 percent of all black students with IEPS suspended for 1 to 10 days, these students were 2.59 times more likely than other students with IEPs to be suspended for this period. Of all black students with IEPs, 0.9 percent were suspended for more than 10 days, and they were 1.91 times more likely than others to receive an OSS for this length of time. Among all 72 OSSs in this time category, the breakdown was: 32 for 11-20 days; 28 for 21-to-30 days; 1 for 41-50 days; and 2 for 151-200 days.

Percentages and risk ratios for other student groups with OSSs of 1 to 10 days were:

- ***Hispanic Students.*** 45 percent suspended, with a risk ratio of 0.29
- ***White Students.*** 15 percent suspended with a risk ratio of 0.93
- ***Other Students.*** 16 percent suspended with a risk ratio of 0.32

Exhibit 3o. OSS Race/Ethnic Risk Ratios for Students with IEPs



	Black	Hispanic	White	Other
Percentage 1 - 10 Days	52%	45%	15%	16%
Percentage >10 Days	0.9%			
Risk Ratio 1 - 10 Days	2.59	0.29	0.93	0.32
Risk Ratio >10 Days	1.91			

Focus Group Participant Feedback

There were numerous concerns that school personnel do not meet all procedural requirements for students who are removed from school or class for disciplinary reasons, e.g. tracking removals appropriately, tracking number of days removed, convening manifestation determination meetings, etc. Participants told the team about a promising new initiative involving 15 schools with emotional impairment programs that would support students' social/emotional needs. The district's two behavior specialists were assisting with this initiative.

Academic Instruction, Intervention, and Supports

A fundamental goal of the common core state standards (CCSS) was to create a culture of high expectations for all students. In a statement on the application of the common core to students with disabilities, the CCSS website includes a visionary statement that reinforces this intent:

> Students with disabilities … must be challenged to excel within the general curriculum and be prepared for success in their post-school lives, including college and/or careers." These common standards provide historic opportunity to

> improve access to rigorous academic content standards for students with disabilities.[62]

The statement underscores the supports and accommodations that students with disabilities need to meet high academic standards and fully demonstrate their conceptual and procedural knowledge and skills in ELA (reading, writing, speaking, and listening) and mathematics. These expectations for students with disabilities include the following elements:

- ***Instruction and related services*** designed to meet the unique needs of students with disabilities and enable them to access the general education curriculum.
- ***Teachers and specialized instructional support personnel*** who are prepared and qualified to deliver high-quality, evidence-based, and individualized instruction and support.
- ***Instructional supports for learning*** that are based on the principles of universal design for learning (UDL), which foster student engagement by presenting information in multiple ways and allowing diverse avenues of action and expression.[63]
- ***Instructional accommodations*** that reflect changes in materials (e.g., assistive technology) or procedures that do not change or dilute the standards but allow students to learn within the CCSS framework.

The general education curriculum refers to the full range of courses, activities, lessons, and materials routinely used by the general population of a school. Students with disabilities have access to this curriculum when they are actively engaged in learning the content and skills that are being taught to all students. To participate with success in the general curriculum, a student with a disability may need additional services, such as instructional supports, accommodations, scaffolding, assistive technology, and other services. With a universal design for learning (UDL) approach, information is presented in varied ways, allowing multiple avenues of learning and expression.

When special educators teach students from multiple grades in a single self-contained class, it is difficult for them to focus on each grade's content standards with any depth or effectiveness. When schools are organized in an inclusive manner, on the other hand, they are better able to support students with various disabilities and enable them to attend the school they would otherwise attend if not disabled. This model enables more students with disabilities to attend schools in their community, supports a more natural distribution of students with disabilities at each school, and reduces transportation time and costs. Still, general education instruction must be meaningful for students with disabilities, and their presence in the classroom, alone, is insufficient to make it so.

[62] Retrieved at http://www.corestandards.org/assets/application-to-students-with-disabilities.pdf.

[63] UDL is defined as "a scientifically valid framework for guiding educational practice that (a) provides flexibility in the ways information is presented, in the ways students respond or demonstrate knowledge and skills, and in the ways students are engaged; and (b) reduces barriers in instruction, provides appropriate accommodations, supports, and challenges, and maintains high achievement expectations for all students, including students with disabilities and students who are limited English proficient." by Higher Education Opportunity Act (PL 110-135). See the National Center on Universal Design for Learning at http://www.udlcenter.org/.

Instruction and Specialized Support for Students in General Education Classes

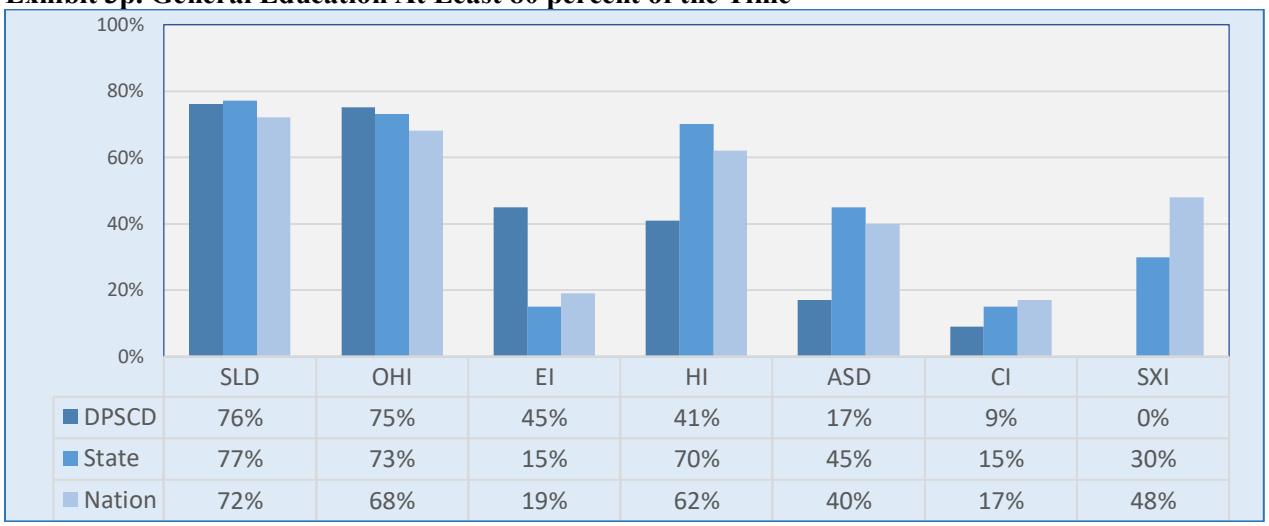
The U.S. Department of Education and the states collect data on the two educational environments in which students are instructed in general education classes nearly half of the school day: at least 80 percent of the time and between 79 percent and 40 percent of the time. (See exhibits 3n and 3o, respectively). Overall, a smaller percentage of students in Detroit are educated in one of these inclusive environments than is the average across the state or nation (58.8 percent, 67.5 percent, and 82.1 percent, respectively).

General Education At Least 80% Of the Time

A higher percentage of district students are educated in this setting in two disability categories compared to others: specific learning disability (76 percent) and other health impairment (75 percent).[64] In addition, a higher percentage of students with an emotional impairment are educated in this setting compared to the state and national averages (45 percent, 15 percent and 19 percent, respectively). (See exhibit 3p.)

Conversely, a lower percentage of district students who have a hearing impairment (41 percent, 70 percent, and 62 percent), autism (17 percent, 45 percent, and 40 percent, respectively), a severe multiple impairment (0 percent, 30 percent, and 48 percent), and a cognitive impairment (9 percent, 15 percent, and 17 percent, respectively) are educated inclusively compared to state and national averages.

Exhibit 3p. General Education At Least 80 percent of the Time



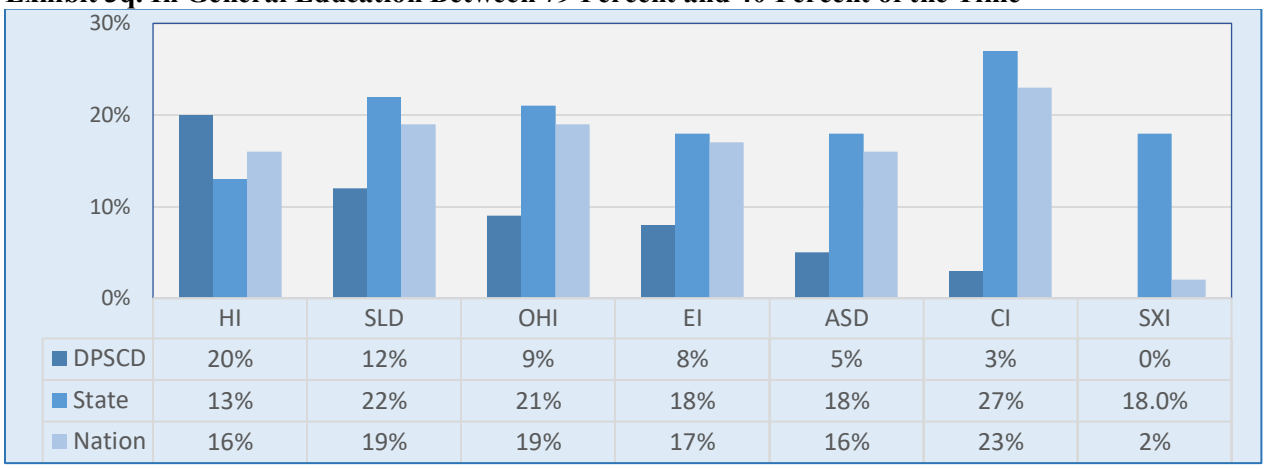
	SLD	OHI	EI	HI	ASD	CI	SXI
DPSCD	76%	75%	45%	41%	17%	9%	0%
State	77%	73%	15%	70%	45%	15%	30%
Nation	72%	68%	19%	62%	40%	17%	48%

General Education Between 79 Percent and 40 Percent of the Time

Generally, DPSCD students are instructed in general education classes between 79 percent and 40 percent of the time at lower rates than students across the state and nation. The only exception is among students with a hearing impairment (20 percent, 13 percent, and 16 percent, respectively). (See exhibit 3q.)

[64] Almost all students with a speech/language impairment are educated in general education classes at least 80 percent of the time.

Exhibit 3q. In General Education Between 79 Percent and 40 Percent of the Time



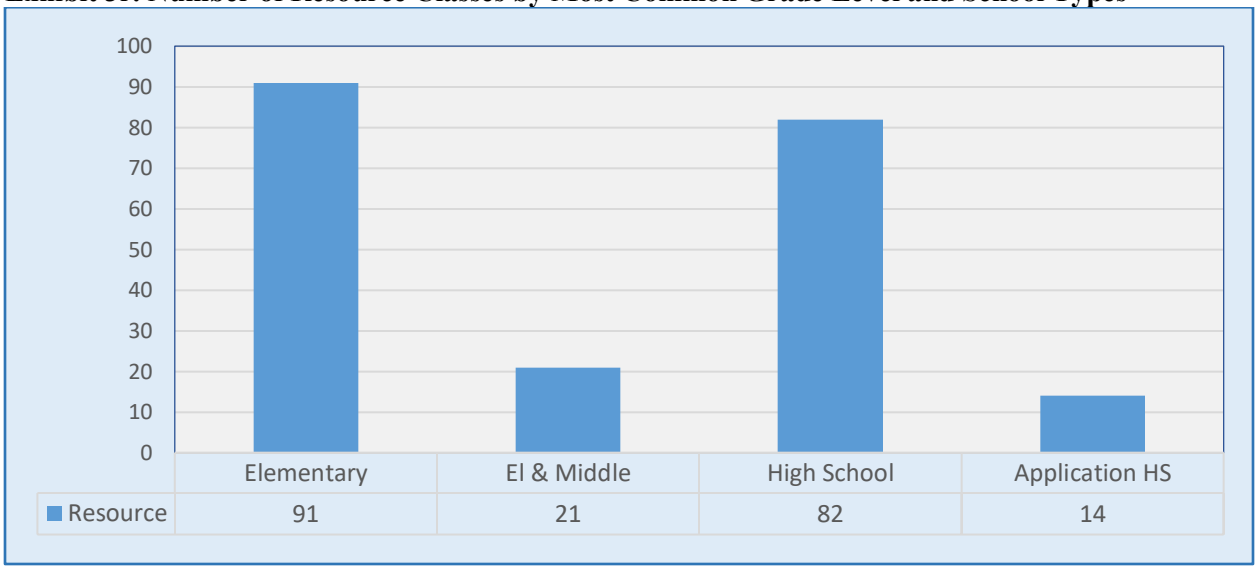
	HI	SLD	OHI	EI	ASD	CI	SXI
DPSCD	20%	12%	9%	8%	5%	3%	0%
State	13%	22%	21%	18%	18%	27%	18.0%
Nation	16%	19%	19%	17%	16%	23%	2%

Resource Support

Except for students receiving speech/language services only, students educated half the time or less outside of a specialized program generally receive resource services. Data in Exhibit 3r show the number of resource classes in schools by school grade level and in application high schools. Every school has at least one resource class and one high school has 11 classes.

- ***Elementary Grades.*** With 91 classes, these schools have from one to four resource classes each.
- ***Elementary and Middle Grades.*** With 21 classes, these schools have either one or two classes.
- ***High Schools.*** With 82 classes, these schools have from 1 to 11 classes each.
- ***Application High Schools.*** With 14 classes, two schools each have 1 class, one school has 2 classes, and one school has 10 classes.

Exhibit 3r. Number of Resource Classes by Most Common Grade Level and School Types



	Elementary	El & Middle	High School	Application HS
Resource	91	21	82	14

Students from Other Districts Attending DPSCD Resource Classes

Data provided by DPSCD show that 188 (42.6 percent) students from other districts receive resource special education services in district schools. The Council team assumes that these students attend district schools under the state's school choice program and not because their home districts' have no appropriate services for them.[65]

Instruction for Students in Specialized Programs

School districts that operate without an MTSS framework often organize special education by programs predicated on a theory of "specialization" that students with common characteristics can be matched to a specific program. In reality, such programs often include students with a large range of achievement and behavior, as well as students with characteristics that fall between program types. Such specialization can sometimes perpetuate the myth that student needs can be addressed fully with correct program matches based upon a prescribed set of characteristics. If a student is failing, then it is presumed to be because he or she is simply in the wrong program, so a new one is sought to provide a better fit. In such circumstances, there is pressure to create more specialized and categorical programs rather than creating a broad framework for general-education instruction and behavioral supports based on student need.

Configuration of DPSCD Specialized Programs

The district has numerous specialized programs. Programs on which the district provided data included autism spectrum disorder (ASD), emotional impairment (EI), cognitive/emotional impairment (EI/CI) dual diagnosis, hearing impairment (HI), mild cognitive impairment (MICI), moderate cognitive impairment (MOCI), physical impairment or other health impairment (POHI), physical impairment (PI), severe cognitive impairment (SCI), severe multiple impairment (SXI), specific learning disability (SLD), visual impairment (VI), and older students work skills and project search. In addition, DPSCD has a day treatment program, but the district did not report data. In addition, DCPSD operates an early intervention program for children birth through two years of age, and early childhood special education (ECSE) for children three through five years of age.

DPSCD's categorical program delineations are based on Michigan Administrative Rules for Special Education (MARSE), which contain descriptions of these programs along with requirements for the maximum number of students per special educator and paraprofessional. Several DPSCD's programs are operated in coordination with Wayne RESA to meet obligations under Michigan's Act 18. These coordinated activities include ASD, day treatment, CI/EI dual diagnosis, HI, MOCI, POHI, SCI, SXI, VI, Early Intervention (birth to 3) and Work Skills. DPSCD has written descriptions of each program, along with entrance and exit criteria.

Unlike other school districts that the Council team has reviewed, Detroit's configuration of services appears to be unduly categorical, referencing disability areas rather than common student needs. The team was told by interviewees that students with various disabilities may be educated in a program having a different disability name, but there is no state mandate requiring

[65] The data system does not differentiate between students from other districts attending DPSCD because of choice or pursuant to Wayne RESA's regional plan.

program labels to be categorical in nature. Any changes would require coordination with Wayne RESA.

Impact on Transportation

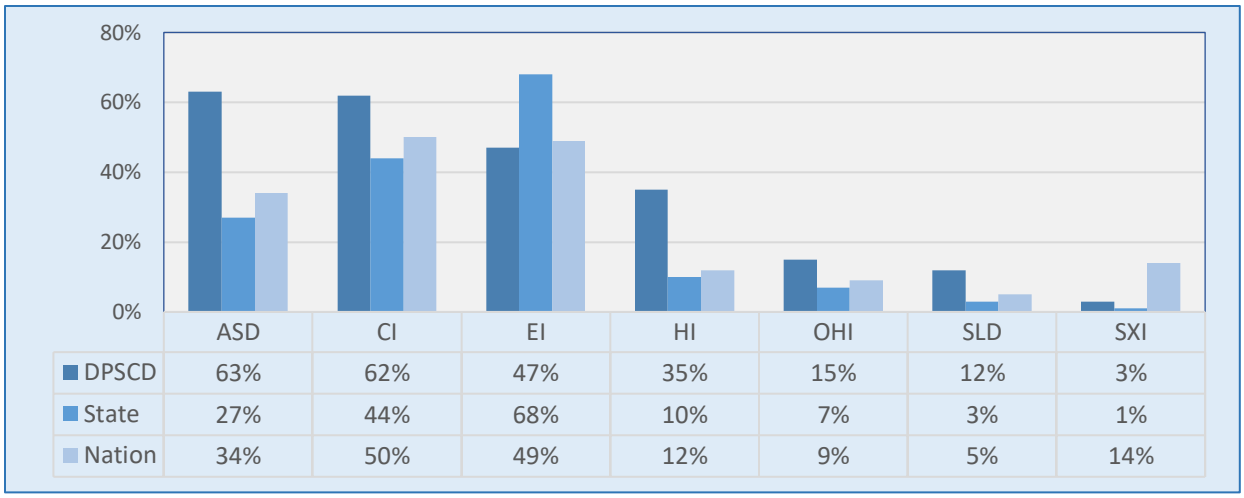
Some 40 percent of students with IEPs, or 3,398 students, are provided door-to-door transportation. This rate is affected by several factors, including the placement of specialized programs in schools that agree to host them. Also, the district has not used a protocol or decision tree to guide IEP transportation decisions on whether a student requires door-to-door service.

Students can be on a bus for 1.5 hours each way, and the team was told in focus groups that it can take one to five days--and as many as 10 days--to execute a new transportation route. There were varying reasons given for delayed transportation routes. Delays may occur because school personnel do not exit a student in a timely manner. Delays may also occur in entering student information into the transportation system. If parents are unable to transport their child to a new school before the bus route is initiated, the student remains at home. Reportedly, this process sometimes takes weeks to resolve.

Specialized Programs in Regular Schools

Data in exhibit 3s shows the percentages of students receiving instruction in general education classes less than 40 percent of the time. DPSCD educates a higher percentage of students in this setting compared to state and national averages in every disability category – except for severe multiple impairment (almost entirely educated in special schools) and emotional impairment (no data provided for day treatment programs.)

Exhibit 3s. Education in General Education Classes Less Than 40 Percent of the Time



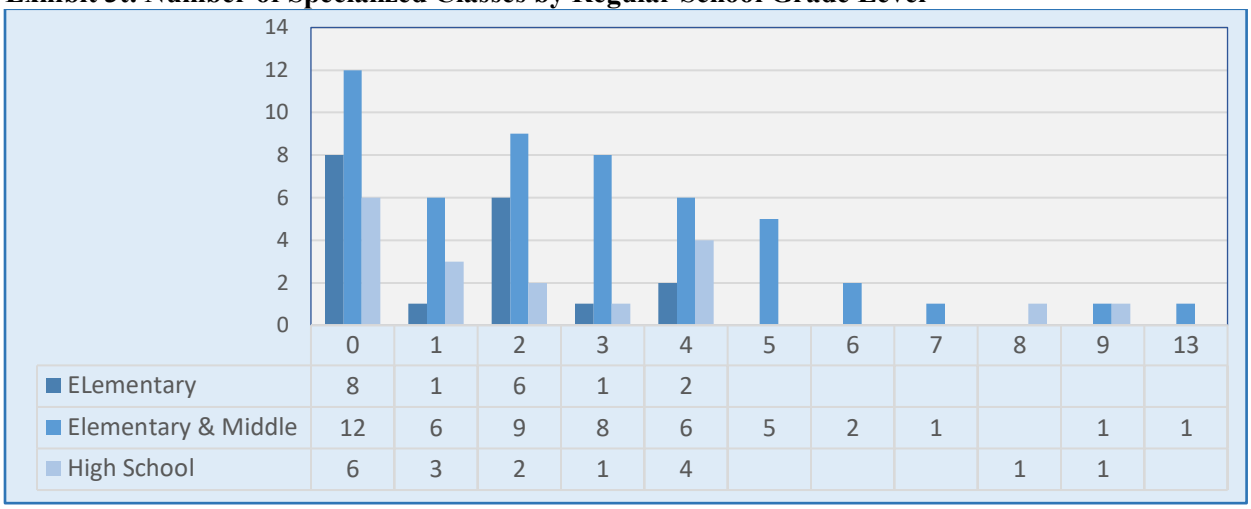
	ASD	CI	EI	HI	OHI	SLD	SXI
DPSCD	63%	62%	47%	35%	15%	12%	3%
State	27%	44%	68%	10%	7%	3%	1%
Nation	34%	50%	49%	12%	9%	5%	14%

Number of Specialized Classes by Regular School Grade Level

Data in exhibit 3t show the number of regular schools having between zero and 13 specialized classes by school type. Generally, having numerous specialized classes negatively affects a principal's ability to support the provision of intensive educational/related service needs, the coordination of transportation services, and other services

- ***Elementary and Middle School Grades.*** Twenty schools have no specialized classes; 7 schools have 1 class; 15 schools have 2 classes; 9 schools have 3 classes; 8 schools have 4 classes; and 5 schools have between 5 and 13 classes.
- ***High Schools.*** Six schools have no specialized classes; 3 have one class; 2 have two classes; 1 school has three classes; 4 schools have 4 classes; and 2 schools have 8 and 9 classes, respectively.

Exhibit 3t. Number of Specialized Classes by Regular School Grade Level

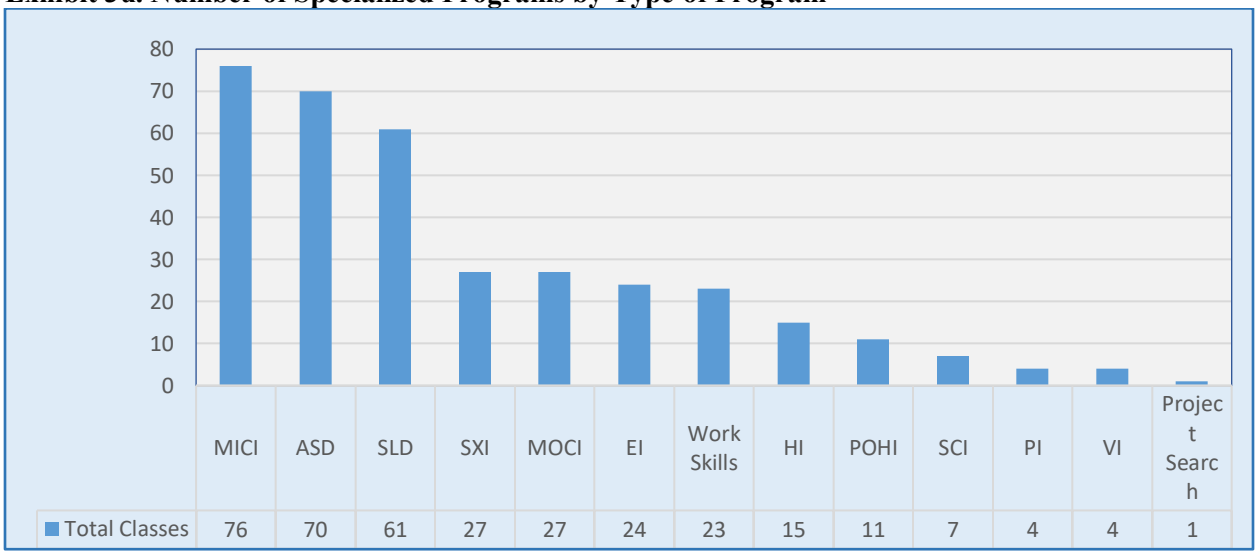


	0	1	2	3	4	5	6	7	8	9	13
ELementary	8	1	6	1	2						
Elementary & Middle	12	6	9	8	6	5	2	1		1	1
High School	6	3	2	1	4				1	1	

Number of Specialized Programs by Type of Program

Data in exhibit 3u show the number of specialized programs by type. The most common programs were MICI, ASD, and SLD with 76, 70, and 61 classes, respectively. Programs with 27 to 23 classes included SXI, MOCI, EI and Work Skills. Areas with the smallest number of classes were SCI, PI, VI and Project Search--a total of 16 classes among them. The large proportion of specialized program classes for SLD is among the highest of other urban districts the Council team has reviewed.

Exhibit 3u. Number of Specialized Programs by Type of Program

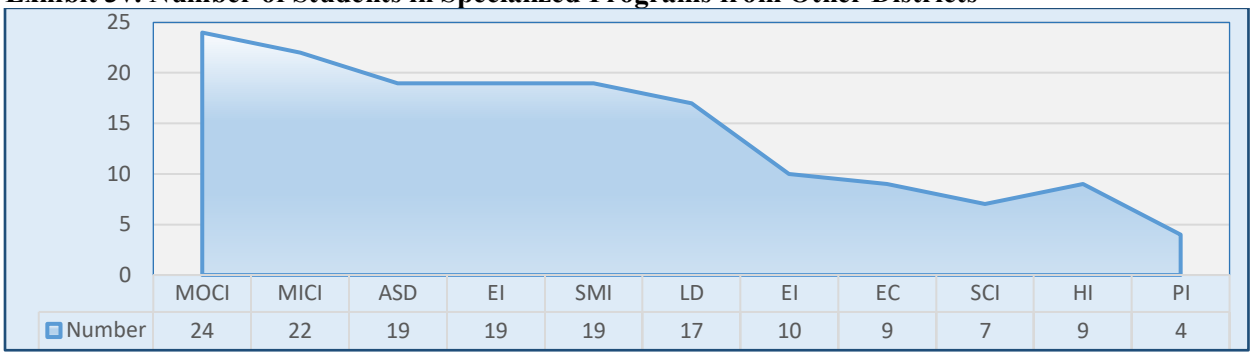


	MICI	ASD	SLD	SXI	MOCI	EI	Work Skills	HI	POHI	SCI	PI	VI	Project Search
Total Classes	76	70	61	27	27	24	23	15	11	7	4	4	1

Students in Specialized Programs from Other Districts

Students from outside Detroit attend DPSCD's specialized programs for various reasons. Some have IEPs for specialized programs that according to the Wayne RESA plan provide for placement in DPSCD. Others have parents that choose to have their students in the district under the state's school-choice program. Reportedly, the district's data system does not distinguish between these two reasons. Data in exhibit 3v show the number of students living out-of-district by program. These figures show that most students are educated in the following programs: moderate cognitive impairment (24 students), mild cognitive impairment (22), autism, emotional impairment and severely multiple impairment (19 each) and learning disabilities (17). Specialized programs of 10 or less include early intervention, early childhood, severe cognitive impairment, hearing impairment and physical impairment.

Exhibit 3v. Number of Students in Specialized Programs from Other Districts

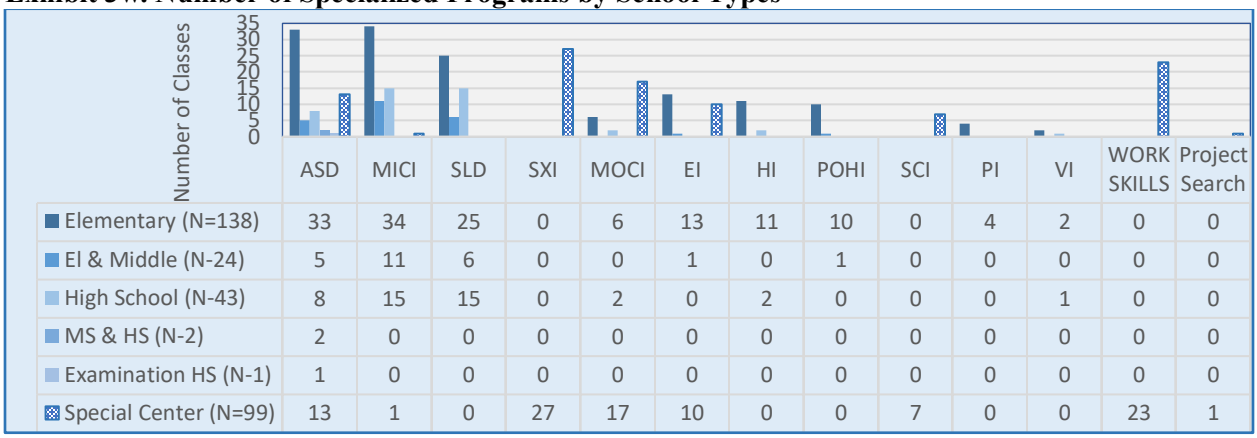


Specialized Programs by School Types

Data in exhibit 3w show the number of specialized programs by school type. Overall, the district operates some 300 specialized classes. The following are notable configurations.

- ***SLD.*** Thirty-one classes are at schools with elementary and middle school grades. Although the Council team was told that SLD classes are phased out at the high school level, data reported 15 classes at this level. According to district information, the SLD program is typically for students with high incident disabilities (SLD, EI, OHI) who require direct instruction services in all four core curricular areas.
- ***EI.*** This program is offered only at schools with elementary and middle school grades, and at special centers, which have 10 classes. No such classes are offered in regular high schools.
- ***SXI, SCI, Work Skills, and Project Search.*** These specialized programs are offered only at center schools. Although it is common for other school districts to house postsecondary transition programs for older youth in developmentally appropriate environments outside of regular high schools, it is not common that classes for severe multiple impairment and severe cognitive impairment programs be offered only in center schools.
- ***PI and POHI.*** There are 14 classes in this category at the elementary and middle school level, but no classes are offered at the high school level.
- ***Examination Schools.*** Only one specialized program class (ASD) is offered at the four high schools having an examination requirement.

Exhibit 3w. Number of Specialized Programs by School Types



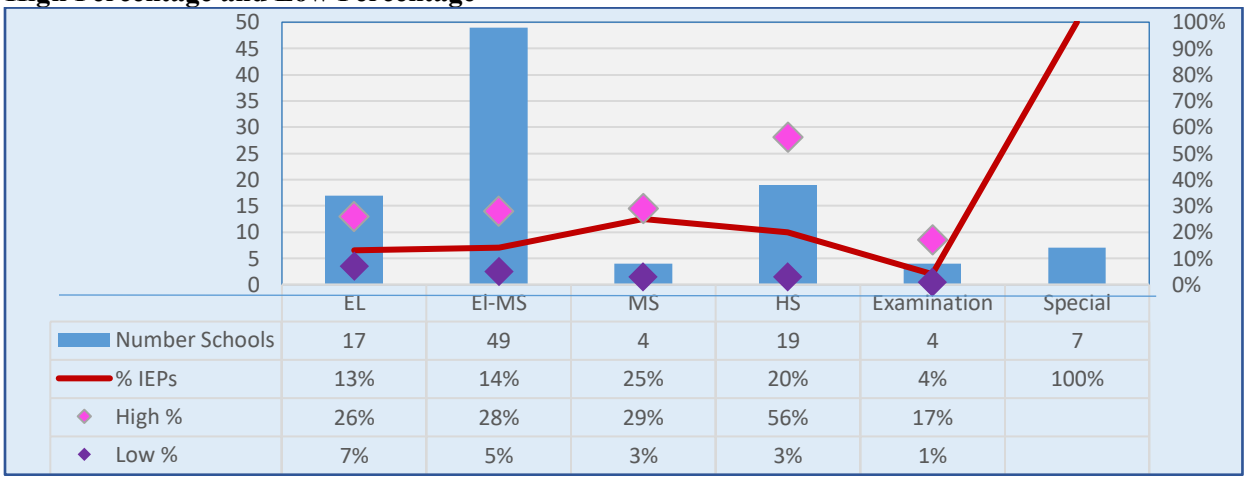
	ASD	MICI	SLD	SXI	MOCI	EI	HI	POHI	SCI	PI	VI	WORK SKILLS	Project Search
Elementary (N=138)	33	34	25	0	6	13	11	10	0	4	2	0	0
El & Middle (N-24)	5	11	6	0	0	1	0	1	0	0	0	0	0
High School (N-43)	8	15	15	0	2	0	2	0	0	0	1	0	0
MS & HS (N-2)	2	0	0	0	0	0	0	0	0	0	0	0	0
Examination HS (N-1)	1	0	0	0	0	0	0	0	0	0	0	0	0
Special Center (N=99)	13	1	0	27	17	10	0	0	7	0	0	23	1

Percentage of Students with IEPs by School Type

Large variations in specialized classes produce large variances in percentages by school in students with IEPs. As data show in exhibit 3x, the percentage of students with IEPs by school varies from 1 percent to 56 percent.

- ***Overall Percentage of Students with IEPs.*** Schools with only middle grades have the highest percentages of students with IEPs (25 percent), followed by high schools (20 percent), elementary/middle grades (14 percent), and elementary grades (13 percent).
- ***Percentage Ranges.*** High schools have the widest range of percentages, ranging from 3 percent to 56 percent. Schools with elementary grades and elementary/middle school grades have comparable rates, ranging from 7 percent to 26 percent, and 5 percent to 28 percent, respectively. The range among schools with only middle grades and examination high schools is also wide. There are four schools with middle grades, two having rates of 3 percent and 4 percent, and two schools with rates of 25 percent and 29 percent. Similarly, two of four examination high schools have rates of only 1 percent each, and two have rates of 12 percent and 15 percent. As mentioned above, high disability rates have an impact on students with IEPs and the school community at large.

Exhibit 3x. Number of Schools by Type, and by School Type: Percentage of Students with IEPs, High Percentage and Low Percentage



	EL	El-MS	MS	HS	Examination	Special
Number Schools	17	49	4	19	4	7
% IEPs	13%	14%	25%	20%	4%	100%
High %	26%	28%	29%	56%	17%	
Low %	7%	5%	3%	3%	1%	

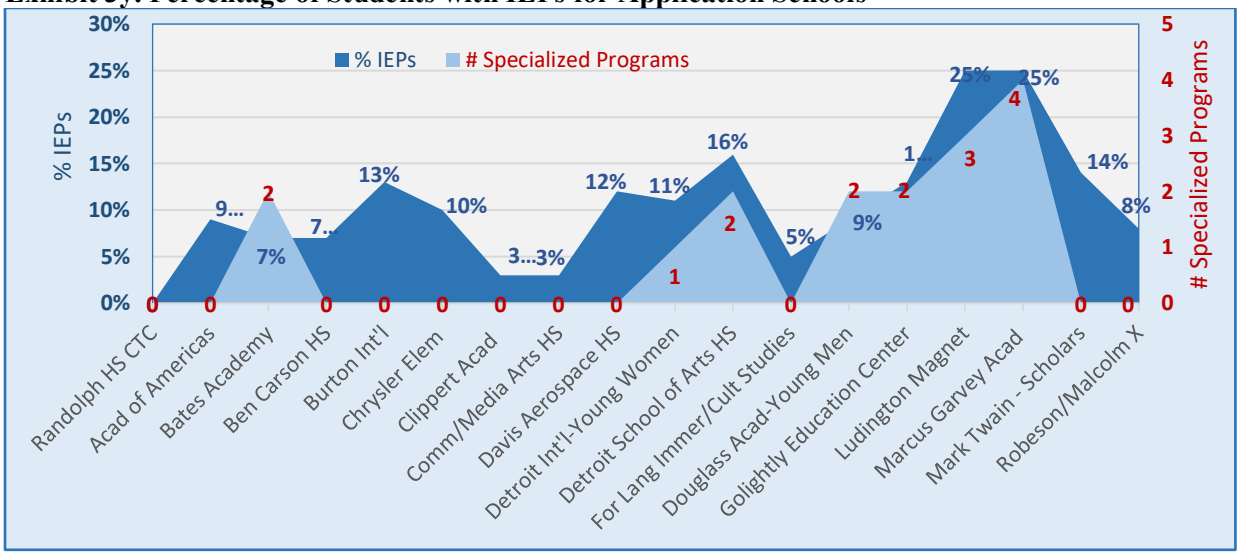
Percentage of Students with IEPs Enrolled in Examination and Application Schools

Examination high schools and application schools generally have disproportionately low percentages of students with IEPs and specialized programs. This means that most students having IEPs are placed into a specialized program and are unable to access these schools, making their options very limited.

As previously mentioned, two examination schools (Cass Technical and Renaissance) have only 1 percent of their students with IEPs. The two others (King and Southeastern) have rates of 17 percent and 13 percent. King has only one specialized program (ASD).

Data in exhibit 3y on the district's 18 application schools show the percentages of students with IEPs and the numbers of specialized programs in each school. These figures show IEP rates that generally range from 3 percent to 16 percent.[66] Two schools have rates of 25 percent. However, one of these schools (Ludington Magnet) has an honor's program with only 4 percent students with IEPs while the Ludington magnet school's rate is 29 percent. Although all the schools have resource services, 11 (61 percent) have no specialized programs. The remaining 7 schools have a total of 16 specialized programs (1 for SLD, 5 for ASD, 4 for MICI, 1 for MOCI, 2 for POHI, 2 for HI, and 1 for VI). One school has 1 class; three have 2 classes; and two each have 3 and 4 classes.

Exhibit 3y. Percentage of Students with IEPs for Application Schools



Case Study

As a case study, the school with the largest percentage of students with IEPs is the Detroit Institute of Technology at Cody, which is one of three small schools at the facility. Overall, 56 percent of the school's students have IEPs, which includes attendance in one of five specialized classes for students with cognitive impairments. When examining rates in grades 9, 10, 11, and 12, one sees that the figures are even more disproportionate (59 percent, 55 percent, 45 percent, and 62 percent). Rates in the 12th grade include students participating in postsecondary transition

[66] Data was not available for the number and percent of students with IEPs at Randolph High School CTC.

services and activities. By comparison, the other Cody high schools have high but somewhat smaller rates. Cody Medicine/Community Health school's overall rate is 29 percent, but by grade is 19 percent, 40 percent, 29 percent, and 28 percent; the Cody Public Leadership school's overall rate is 26 percent, and by grade is 26 percent, 31 percent, 11 percent, and 28 percent. Focus group feedback suggests that this inequitable enrollment of students with IEPs at Cody could be addressed in a reasonable way.

As the only high school in the far southwest region of the district, Cody is the "default" choice for students living in this area. Yet, the high number of specialized program classes have led to a disproportionately high enrollment of students at the Detroit Institute of Technology. Some relief could be achieved by considering the three schools as one for the purposes of special education.

Focus Group Participant Feedback

Compared to other special education reviews conducted by the Council's team, there was less discussion in Detroit about the way special educators collaborated with and supported general educators in supporting students served by both. Very few examples were shared of co-teaching, structured time for collaboration and discussion, or professional development involving both general and special educators. Many interviewees expressed the need for stronger relationships between general and special education teachers, more support of students with IEPs in general education classes, and clarity of personnel roles.

Other focus-group comments included the following.

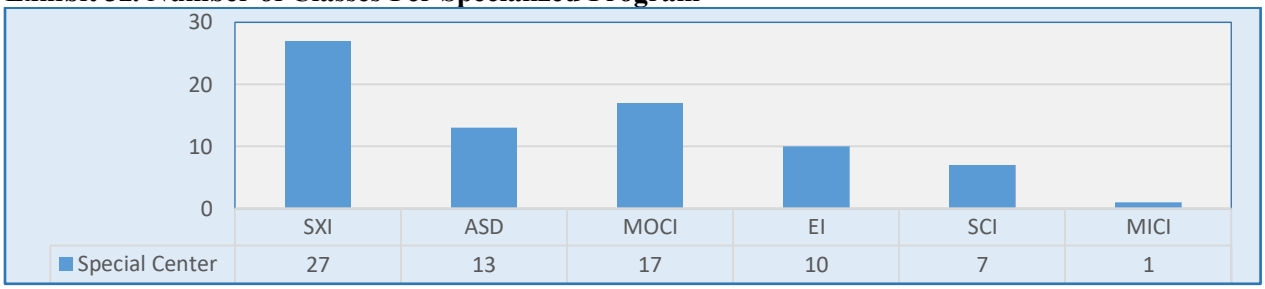
- ***Assistive Technology.*** All students with IEPs are considered for assistive technology. Parents and teachers have access to the district's impressive assistive technology information center's (ATTIC) lending library. The Lending Library has thousands of pieces of assistive technology, books, hardware, software, switch-activated toys, and more. There were concerns that students who would benefit from these services do not have them, especially students who are nonverbal.
- ***School Cultures.*** Some principals indicated that their schools have open and welcoming environments for students with disabilities. Other participants indicated that some principals resist having specialized programs at their buildings and others do not provide leadership for inclusive practices.
- ***Literacy Acceleration.*** There are insufficient resources to accelerate literacy skills among poor readers with disabilities. The district has begun to implement Voyager-Sopris Passport Journeys in the SLD and the mild cognitive impairment programs. Approximately 15 buildings are currently using the program.
- ***Resource Service Model.*** Typically, students are educated using a traditional "resource' service model. This involves students leaving the general education class to receive education that may or may not be relevant to or support instruction based on core curricular standards.
- ***Substituting for Absent Teachers.*** A common theme among focus-group participants was that special educators are sometimes asked to substitute for absent general education teachers, taking them away from their own caseloads.

- ***Large Class Sizes.*** Maximum state class-size requirements are not consistently followed in the district, which negatively affects instruction. This circumstance is exacerbated by teacher shortages and teachers without the experience and training necessary to be effective. Large class sizes make it difficult to educate students with IEPs in general education. This factor may account for the relatively small percentage of students educated between 79 percent and 40 percent in general education classes. Although teachers are paid for "oversize" classes, participants believed that class sizes need to be reasonable before increasing general education inclusivity.
- ***Prep Periods.*** Some teachers in specialized program take advantage of their prep period only when a general educator or other teacher "takes their students," according to interviewees. This is less an issue at the high school level where students have scheduled classes.
- ***English Learners.*** Once ELs are identified as needing special education, there is little support provided to address their language acquisition needs, unless the student is in a school specializing in bilingual education. Although special education teachers address students' language needs, not all special educators have received training on the acquisition of a second language. Also, there are few curricular materials for ELs, including those with disabilities.

Instruction for Students in Specialized Schools

With a maximum state performance plan target of 4 percent for students attending a separate school, DPSCD's rate is 12 percent. It is also higher than the 6 percent rate in Wayne RESA, 5 percent in the state, and 3 percent nationally. Some 922 of the district's students with IEPs attend such schools. Together, the schools house 99 of the specialized program classes, including 23 in Work Study and 1 in Project Search. The largest number of classes are designed for severe multiple impairments (27), followed by autism spectrum disorder (13), moderate cognitive impairment (17), emotional impairment (10), severe cognitive impairment (7), and mild cognitive impairment (1). (See exhibit 3z.)

Exhibit 3z. Number of Classes Per Specialized Program

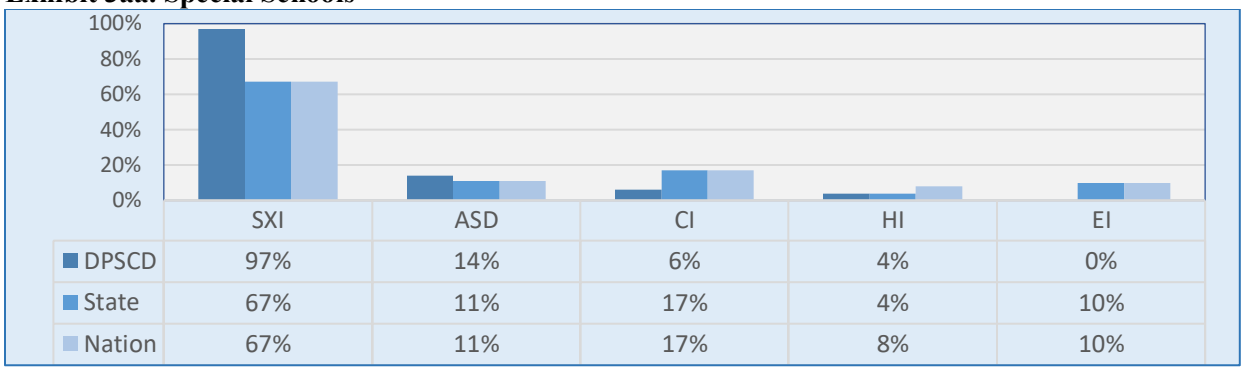


Percentage of Students by Specialized Program in Separate Schools

As data show in exhibit 3aa, DPSCD's rates for students receiving instruction in special centers are lower than the state and nation in the areas of cognitive impairment and emotional impairment. However, while figures show that no students with emotional impairments are educated in this setting, district data show there are 10 EI specialized program classes at center schools. District rates are the same as the state for students with hearing impairments. It is also

important to note that almost all students with a severe multiple disability (97 percent) are educated in this setting, compared to 67 percent at the state and national levels.

Exhibit 3aa. Special Schools



	SXI	ASD	CI	HI	EI
DPSCD	97%	14%	6%	4%	0%
State	67%	11%	17%	4%	10%
Nation	67%	11%	17%	8%	10%

Students from Other Districts

Of the 684 students educated in DPCSD's special schools, 57 (8 percent) are from other districts, because of parent choice or pursuant to the Wayne RESA regional plan and the IEP stipulates the need for a separate facility.

Focus Group Participant Feedback

Some of the most serious concerns expressed to the Council team by interviewees concerned the operation of the district's day treatment program at the two schools hosting Turning Point. Concerns included--

- ***Diploma Track.*** Reportedly, students who should be on a diploma track are issued a certificate of completion, because teachers certified to teach credit-bearing classes based on the core curriculum necessary for graduation are not available and because other required courses are unavailable.
- ***Support for Behavior.*** Student's emotional/social and behavioral issues overwhelm instruction, and suspensions or expulsions are sometimes given in lieu of appropriate behavioral supports.
- ***Procedural Issues.*** Numerous procedural issues lead to due process hearings and state complaints.
- ***Resources.*** Instructional materials, including books, are insufficient and inadequate.

Additional concerns related to the district's adherence to the Wayne RESA Plan for the Delivery of Special Education, the Act 18 Agreement, the Act 18 Budget process, and center program procedures. It was clear that DPCSD needs to clarify roles and responsibilities of administrators and staff members with respect to these requirements.

Generally, interviewees reported that appropriate materials and resources are available for students in other specialized programs. For example, it was reported that assistive technology was available for students. However, there were serious concerns about the operation of special school budgets, which are funded by Wayne RESA, and delays associated with schools' timely access to

budgeted funds to purchase materials. This issue is discussed further below in subsection IV under fiscal issues, Support for Teaching and Learning for Students with Disabilities.

Placement Center

The district relies on a single centralized placement center to provide various functions for new students with IEPs and students who are moving from one residence to another within the district. According to its webpage, the center's specialists assist parents/guardians in enrolling their children in appropriate classrooms, including students with IEPs returning or coming to DPSCD from other school districts.[67] Changes in placements will usually be ready for pick-up in 24 to 48 hours depending on the number of parents who seek service. For former DPSCD students with a current IEP, simple changes can be completed at a local school by fax. The center:

- Assists with placement of students based on their individualized education program.
- Assists with changing addresses and placements when students move.
- Monitors class sizes to ensure maintenance of compliance.
- Assists with assigning students to the appropriate teacher based on student program.
- Investigates compliance complaints and resolves them.
- Provides professional development to staff on changes in the IEP process

In the past, the placement center had two administrators, half-time placement and half-time compliance personnel, and five clerical staff members. Currently, the center is staffed by one administrator, three clerical staff, and four IEP compliance specialists who assist when available. Generally, placement personnel match the student's IEP to schools with a specialized program that is located closest to the student's residence. When difficulties occur because classes have students above state numerical caps, special education supervisors are used to resolve the problem.

Placement Timeliness

According to DPSCD, as of February 2nd there were 13 students waiting for initial placements, and 13 were waiting for changes in placements because of seat availability. A high proportion of these students have autism spectrum disorder. Some of these students have been at home for several months. Reportedly, homebound services are not being provided because the service is not medically necessary. Placement difficulties are exacerbated by the categorical nature and configuration of services for these students. As data in exhibit 3bb show, DPSCD students with ASD receive instruction at disproportionately higher rates in more restrictive environments compared to state and national figures.

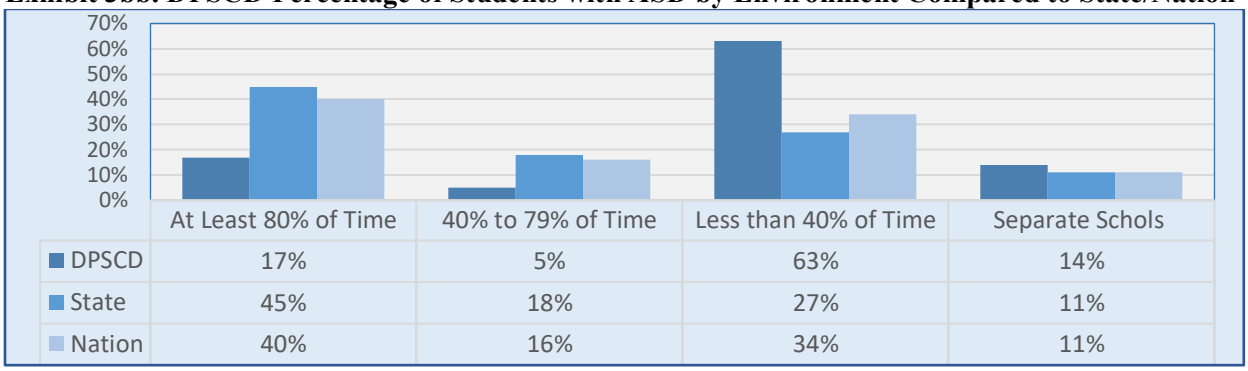
- ***General Education At Least 40 Percent of Time***. Only 5 percent of ASD students in the district are educated in this setting, compared to much higher rates at the state (18 percent) and national levels (16 percent).
- ***General Education Less Than 40% of Time***. Some 63 percent of district students with ASD are educated in specialized classes, compared to much lower rates at the state (27 percent)

[67] Retrieved from http://detroitk12.org/admin/academic_affairs/special_education/placement_centers/.

and national levels (34 percent).

- ***Separate Schools***. Some 14 percent of district students with ASD are educated in schools attended solely by students with disabilities compared to 11 percent of students at the state and national levels.

Exhibit 3bb. DPSCD Percentage of Students with ASD by Environment Compared to State/Nation



	At Least 80% of Time	40% to 79% of Time	Less than 40% of Time	Separate Schols
DPSCD	17%	5%	63%	14%
State	45%	18%	27%	11%
Nation	40%	16%	34%	11%

Focus Group Participant Feedback

The placement center and its processes generated considerable discussion during focus group sessions. The most notable concerns included--

- ***Phone Line.*** The use of one phone line at the center substantially restricts placement center access.
- ***Reception.*** Parents have been seen waiting for help with no person to greet them.
- ***Incorrect Information.*** Parents are sometimes told by school personnel that the school does not have the "correct" services for the student and to return to the placement center for another school option.
- ***Transfer Notice.*** School personnel are frustrated when not informed about a transfer-in student, and when the student arrives without required paperwork.
- ***School-based Enrollment.*** Various principals were open to the possibility of enrolling all new students at the school level, with support for appropriate student placements.
- ***Temporary Placements.*** There was confusion about whether "C-placements" or temporary placements continue to be an available option for students.
- ***Caseload Review.*** With small numbers of staff, it is difficult to complete the annual "close out process" where lead teachers from each school meet with center personnel to review caseloads.

Overall Observation of DPSCD's Configuration of Special Education

The district's configuration of special education services is based on an outdated model of categorical specialized programs and limited opportunities for education in general education classes, leading to long transportation times and inequitable enrollment by school of students with disabilities.

Since the 1980s, the nation's school districts have been moving away from educating students in separate schools, which offer weaker instructional opportunities and lesser interaction with nondisabled peers. Under the influence of the federal Office for Civil Rights, state monitoring, and independent actions, there are many examples in Council member districts of effective instruction in regular schools for students who have characteristics like those in DPSCD rather than in specialized programs or center schools. Personnel in Detroit do not seem well-versed in these models or the impact they have on students with IEPs. The team was very concerned that the senior executive director for special education had been given the charge of establishing new separate schools for students with autism, dyslexia, and deaf/blind for the 2019-20 school year. Furthermore, it appears that the district is taking steps to establish alternative schools for teenage mothers/fathers, students engaged in disruptive behavior, overage students, and chronically absent students. It is important that district leaders consider how students with IEPs will be affected, how they would be supported in such settings, or whether more proactive interventions in the regular schools could be used to avoid more segregated educational structures than what the district has already.

Furthermore, DPSCD needs to review schools with disproportionately high and low enrollments of students with IEPs to determine alternative approaches and more equitable placement of specialized programs, and to support effective instruction for more students in general education.

Secondary Transition Services and Support

In Michigan, school districts are to begin transition-planning for students with IEPs when each student is 16 years old. The planning process includes age-appropriate transition assessments, transition services, courses of study that will reasonably enable students to meet postsecondary goals, and annual IEP goals related to students' transitional needs. Transition services and supports prepare students for employment and independent living through coordinated activities that promote movement from school to post-school activities, including postsecondary education, vocational education, integrated employment (including supported employment), continuing and adult education, adult services, independent living, and community participation.

The state performance plan (SPP) for special education includes four indicators on postsecondary transitions for youth with IEPs:

Indicator 1. Percentage graduating from high school with a regular diploma

Indicator 2. Percentage of students with IEPs dropping out of high school

Indicator 13. Percentage of students with IEPs with all required transition components

Indicator 14. Percentage of youth with IEPs who were within one year of leaving high school:

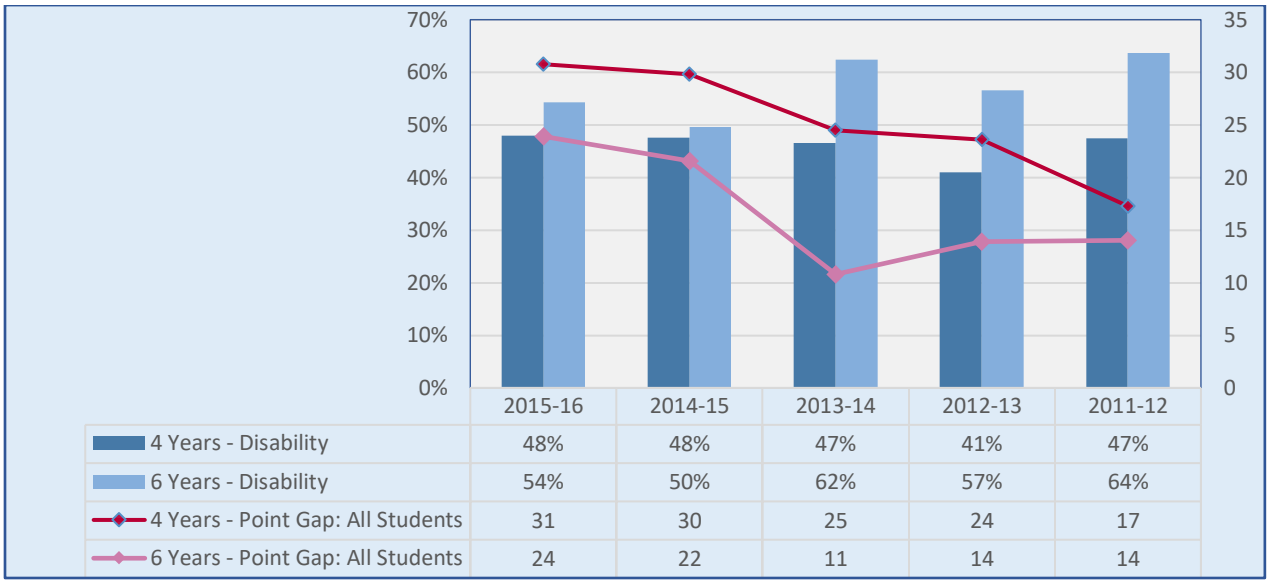
- Enrolled in higher education;
- Same as above or competitively employed; and
- Same as above or in other postsecondary education or training program.

The sections below summarize DPSCD's progress on each of these indicators and the district's support for postsecondary transitional activities and services, including community-based work experiences.

Graduation Rates

Data in exhibit 3cc show five years (2011-12 to 2015-16) worth of data on the percentages of students with IEPs who *graduated* from school after four and six years, and the percentage point gaps with all students.[68] The data show that students with disabilities' four-year graduation rates increased 1 percentage point from 47 percent to 48 percent. However, the six-year rates during this period decreased from 64 percent to 54 percent. The percentage point gaps between students with disabilities and all students were smaller when looking at the six-year rates than the four-year rates, although the gaps increased for both during the five-year period. Along with the performance of students with disabilities in credit-bearing classes, these low rates may reflect the relatively low percentage of students accessing these classes.

Exhibit 3cc. Four and Six Year Graduation Rates: Students with IEPs



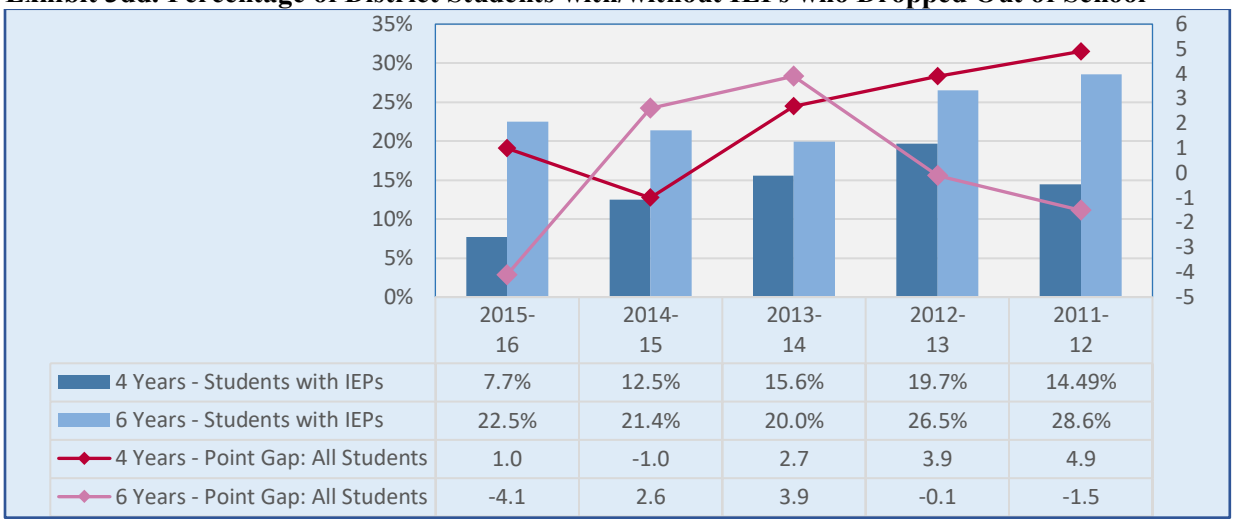
	2015-16	2014-15	2013-14	2012-13	2011-12
4 Years - Disability	48%	48%	47%	41%	47%
6 Years - Disability	54%	50%	62%	57%	64%
4 Years - Point Gap: All Students	31	30	25	24	17
6 Years - Point Gap: All Students	24	22	11	14	14

Dropout Rates

Data in exhibit 3dd show five years (2011-12 to 2015-16) worth of data on the percentages of students with IEPs who *dropped out* of school after four and six years, and the percentage point gaps with all students. These figures indicate that students with disabilities' four-year dropout rates decreased by almost half from 14.49 percent to 7.7 percent. Similarly, five-year rates decreased by 6 percentage points from 28.6 percent to 22.5 percent. Furthermore, when looking at 4-year rates, the percentage point gap between students with disabilities and all students fell from 4.9 points to 1.0 points. The results are even better for 6-year dropout rates, which in 2015-16 were 4.1 percentage points lower than all student rates. This progress is exemplary.

[68] DPCSD indicated that MDE has not released graduation and dropout figures for 2016-17.

Exhibit 3dd. Percentage of District Students with/without IEPs who Dropped Out of School



	2015-16	2014-15	2013-14	2012-13	2011-12
4 Years - Students with IEPs	7.7%	12.5%	15.6%	19.7%	14.49%
6 Years - Students with IEPs	22.5%	21.4%	20.0%	26.5%	28.6%
4 Years - Point Gap: All Students	1.0	-1.0	2.7	3.9	4.9
6 Years - Point Gap: All Students	-4.1	2.6	3.9	-0.1	-1.5

IEP Compliance and Post School Experience

Two additional indicators measure postsecondary transitions. The first concerns IEP requirements, and the second measures postsecondary activities one year after high school.

IEP Compliance

MDE data show that DPSCD's 2015-16 rate was 85 percent[69] on SPP indicator 13. The state compliance requirement on this indicator is 100 percent. This indicator measures IEP compliance with the:

- Percent of youth aged 16 and above with IEPs having appropriate and measurable postsecondary goals, which are annually updated and based on an age-appropriate transition assessment.
- Transition services, including courses of study, that will reasonably enable the student to meet their postsecondary goals.
- Annual IEP goals related to student transition service needs. There also must be documentation that students are invited to IEP team meetings where transition services will be discussed; and documentation that, if appropriate, a representative of a participating agency was invited to the IEP team meeting with prior consent of the parent or student who has reached majority age.

Activities One Year After Leaving High School

SPP indicator 14 has targets for the percentage of students with IEPs engaged in three activities within one year of leaving high school. Exhibit 3ee shows DPSCD performance and targets on these activities.

- ***Enrolled in Higher*** Education**.** Some 28.6 percent of former district students with IEPs met

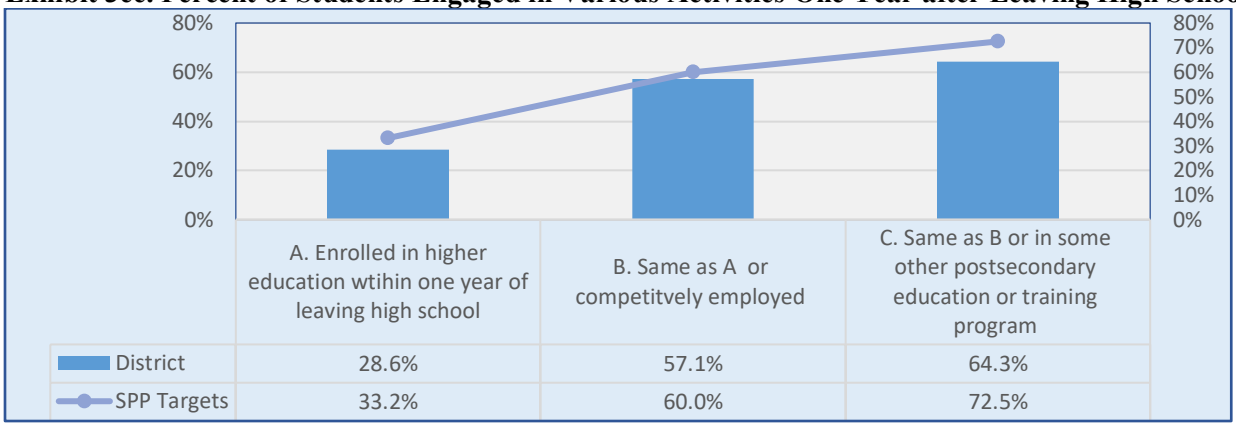
[69] Source of data for IEP compliance rate and exhibit 3w: Michigan Department of Education Special Education (Part B of IDEA) Public Reports School Year 2015-2016, Published May 2017.

this indicator, compared to the 33.2 percent SPP target.

- ***Enrolled in Higher*** Education or Competitively Employed. Some 57.1 percent of former district students with IEPs met this indicator, compared to the state's 60.0 percent SPP target.
- ***Enrolled in Higher Education, Competitively Employed, or Engaged in Other Postsecondary Education or Training Program.*** Some 64.3 percent of former district students with IEPs met this indicator, compared to the state's 72.5 percent SPP target.

While district rates are not far below state targets, there is room for improvement to ensure students are engaged in meaningful work or education after they leave high school.

Exhibit 3ee. Percent of Students Engaged in Various Activities One Year after Leaving High School



Importance of Community-Based Work Experiences for Students with Disabilities

Based on data from the National Longitudinal Transition Study-2, students with IEPs often have poor postsecondary outcomes in employment, education, and independent living. For instance, based on data from 2009 (the most recent available), 60 percent of survey respondents across disability groups indicated that they were currently in a paid job and 15 percent indicated that they were attending postsecondary education. Large numbers of students with disabilities who are able either to work or participate in higher education do not participate in these post-school activities.[70] According to an American Institutes for Research study:

> Previous studies have demonstrated that students with disabilities who have work experiences while in high school are more likely to be employed after high school.[71] Often the work experience in which they were enrolled led directly to a postsecondary job for a student. For these students, it is important to have occupationally specific CTE programs, with appropriate instructional and adaptive support services and accommodations, available in high school.[72]

The National Collaboration on Workforce and Disability affirmed this finding by reporting that "[w]hile work experiences are beneficial to all youth, they are particularly valuable for youth

[70] National Longitudinal Transition Study-2. Retrieved from http://www.nlts2.org/
[71] National Collaborative on Workforce and Disability for Youth, 2011.
[72] Improving College and Career Readiness for Students with Disabilities American Institutes for Research http://www.ccrscenter.org/sites/default/files/Improving%20College%20and%20Career%20Readiness%20for%20Students%20with%20Disabilities.pdf

with disabilities. For youth with disabilities, one of the most important research findings shows that work experience during high school (paid or unpaid) helps them get jobs at higher wages after they graduate."[73] The National Collaboration research showed that quality, work-based learning experiences have the following features:

- Experiences provide exposure to a wide range of work sites to help youth make informed choices about career selections.
- Experiences are age and stage appropriate, ranging from site visits and tours to job shadowing, internships (unpaid and paid), and paid work experience.
- Work-site learning is structured and links back to classroom instruction.
- A trained mentor helps structure the learning at the worksite.
- Periodic assessment and feedback is built into the training.
- Youth are fully involved in choosing and structuring their experiences.
- Outcomes are clear and measurable.

Based on focus group feedback to the team, there appeared to be limited opportunities for students with disabilities to engage in work experiences, such as those offered at the Drew Transition Center for students 18 years and older. Currently there is not a working relationship between external partners and special education to support the linkage of students with disabilities with community-based internships.

Focus Group Participants

Focus group participants provided feedback on ways in which students with disabilities have been provided with experiences to prepare for postsecondary living.

- ***Transition Center.*** The Drew Transition Center provides students with IEPs from 18 to 26 years of age opportunities to work at community-based sites. While students are not paid, they gain experience at such sites as: Marriott, Chili's, TJ Max, TJ Max, etc. Several students transitioned to competitive employment after they left secondary school.
- ***Career Technical Centers (CTC).*** The Randolph Career Technical Center offers half day programming to prepare for various construction trades; marketing; heating, ventilation and air conditioning; etc. Some 83 students with IEPs (27 percent) participate. In prior years the school had three resource teachers, but now they have only one who rotates across the 7 programs. With a special grant, the school now has a teacher who focuses on integrating reading instruction into the broader academic program. Other instructors support students who are homeless, parenting, and limited English proficient, as well as students with disabilities.
- ***Support for Students.*** There are insufficient resources at the CTCs to support students with disabilities in highly technical career courses.
- ***Areas of Study.*** There is a need to improve the projection of CTC areas of study so more

[73] http://www.ncwd-youth.info/work-based-learning

DPSCD's Response to Koby Levin's FOIA Request No. 1718-125, Doc. No. 0080

students make wise decisions and can succeed.

- ***Work Skills.*** Work skills classes are provided within several specialized programs.

Professional Learning

The professional learning association, Learning Forward, has developed its third version of its *Standards for Professional Learning,* outlining features of professional learning that result in effective teaching practices, supportive leadership, and improved student results. The standards are based on seven elements listed in exhibit 3ff.[74]

Exhibit 3ff. Standards for Professional Learning

Standards for Professional Learning
Learning Communities. Occurs within learning communities committed to continuous improvement, collective responsibility, and goal alignment.
Resources. Requires prioritizing, monitoring, and coordinating resources for educator learning.
Learning Designs. Integrates theories, research, and models of human learning to achieve its intended outcomes.
Outcomes. Aligns its outcomes with educator performance and student curriculum standards.
Leadership. Requires skillful leaders who develop capacity, advocate, and create support systems for professional learning.
Data. Uses a variety of sources and types of student, educator, and system data to plan, assess, and evaluate professional learning.
Implementation. Applies research on change and sustains support for implementation of professional learning for long-term change.

Professional Learning in DPSCD

Based on information provided by district staff, the following describes the time available for professional learning in DPSCD.

- ***Before Beginning of School Year.*** Two full days of districtwide mandatory training is provided prior to the beginning of the school year. Training for special educators is provided during this time.
- ***Elementary Schools.*** Grades K-8 dismiss one hour early every Wednesday to hold professional learning communities. Once each month, this meeting extends an hour to provide additional professional development opportunities.
- ***Special Education.*** Special education personnel are developing a professional learning plan to provide both voluntary and additional mandated training in areas of need and interest. The plan will include less large-group "sit-and-get" sessions and more smaller group discussions where professional growth may be broader and deeper. Content is being determined based on

[74] As a trainee, however, students may meet state requirements and be paid less than the minimum wage. Retrieved from https://www.learningforward.org/standards#.UMvVD7Yt0kU.

interest and need. Given multiple areas of noncompliance with MDE standards, the special education department is seeking to raise expectations, and provide content, coaching, and support to school staff. In collaboration with Wayne RESA and various community agencies, training opportunities will expand in a variety of venues. For example, a calendar for regional after school training opportunities is in development.

- ***Ancillary* Staff.** Personnel meet monthly in their area of service, e.g., speech/language pathologists, psychologists, etc.

Focus Group Participant Feedback

Across focus groups, participants indicated that more professional learning was necessary, especially for principals and general and special educators at the school level. Interviewees also indicated that more training was needed on providing accommodations, collaboration between general and special educators, co-teaching, and the like. Other topics of need included IEP development, procedural safeguards related to the removal of students from class and school, dyslexia, and Section 504 requirements. A common theme heard by the team was the lack of time available for training. Staff indicated that the district was exploring more on-line modular training, but the team saw no evidence that this was available yet. Other concerns by interviewees included:

- Special educators using the Voyager program receive training from the publisher, which was considered insufficient.
- Center schools provide their own professional development and facilitate training for their paraeducators as well. Sometimes program supervisors help to identify training resources.
- There was a need for teachers to focus on how to prepare students to take the SAT.
- While IEP training was provided every year, quality and compliance issues persist.

Parent and Community Involvement

A large body of research demonstrates the positive effects of parent-professional collaboration on outcomes for students with disabilities[75] Effective collaboration is often grounded in a strong staff-parent relationship and the combined expertise of parents and professionals in helping students with disabilities meet their goals. Many parents want to fully participate in planning for their child(ren) and supporting changes in services. Nonetheless, collaboration tends to be more difficult when parents are new to the country, when language differences present barriers, and when parents come from poor or low socioeconomic environments.

SPP indicator 8 measures the percentage of parents with a child receiving special education services who report that schools facilitated parental involvement as a means of improving services and results for children with disabilities. Data published by MDE for 2015-16 showed that 21.62

[75] A.T. Henderson, & K. L. Mapp. (2002). *A new wave of evidence: The impact of school, family, and community connections on student achievement.* Southwest Education Development Laboratory. Cited in Fostering Parent and Professional Collaboration Research Brief, Technical Assistance ALLIANCE for Parent Centers, National Parent Technical Assistance Center at http://wsm.ezsitedesigner.com/share/scrapbook/47/472535/1.7_Fostering_Parent_and_Professional_Collaboration.pdf.

percent of parents made such a report, which was somewhat below the state's relatively low 25.6 percent target.

Focus Group Participants

During its site visit, the Council team met with a strong group of parents and community representatives who expressed interest and desire to support DPSCD in the future. They also expressed the desire to form a parent organization to formalize their collaboration with the district. Moreover, the group voiced a variety of issues and concerns, which included--

- ***Town Hall Meeting.*** Parents appreciated the superintendent and his wife's participation in a Town Hall meeting held earlier this school year, which also included board members and some 400 people.
- ***Working Relationship.*** A positive relationship has developed between parent representatives and the senior executive director for special education. Although a variety of parents reported that principals are more responsive with the new special education leadership, others indicated that there had been no movement on their concerns, such as the implementation of IEP accommodations in advanced classes. Following our meeting, a group of parents with concerns met with the senior executive director for special education to share issues for follow-up action.
- ***Respect.*** Some parents believed that principals act as if they do not want children to be educated at their schools, and parents find they are being disrespected.
- ***Resolving Concerns.*** Currently, there is no structured protocol for parents to report special education concerns.
- ***School-Based Knowledge and Implementation.*** School-based personnel need more information about various aspects of disability and related instructional needs, Section 504, special education procedures, medical accommodations, behavior intervention plans, etc. Also, consistent implementation of IEP-required services was a concern.
- ***Removals from School.*** Numerous reports were heard by the team about "unofficial" student removals from school because of disciplinary infractions, even though behavior intervention plans were not followed, and PBIS and restorative practices were not being implemented.

AREAS OF STRENGTH

The following are areas of strength related to the district's support for teaching and learning for students with disabilities.

- ***NAEP Reading.*** At grade four, seven percent of students scored basic/above, an increase of one percentage point. At grade eight, eight percent of students met this standard (an increase of two percentage points). The national average for large cities at both grades decreased by one percentage point. Although the district's percentages for reading and math (below) were quite low, the increase is a positive sign for DPSCD especially considering the nation's decline in scores.
- ***NAEP Math.*** At grade 4, 17 percent of students with IEPs scored basic/above, an increase of 12 percentage points while the large city rate decreased by 1 percentage point. At grade 8, 4

percent of district met this standard, an increase of 1 percentage point as large city rates remained the same.

- ***Dropout Rates.*** Between 2011-12 and 2015-16, the four-year dropout rates for students with IEPs decreased by almost half (14.49% to 7.7 percent), and five-year rates decreased by 6 percentage points (28.6 percent to 22.5 percent). Furthermore, for 4-year rates, the percentage point gap between students with IEPs and all students fell from 4.9 points to 1.0 points, and the 6-year IEP dropout gap in 2015-16 was 4.1 percentage points lower than the all-student rates. This progress is exemplary.
- ***Out-of-School Suspensions.*** Students with IEPs are not much more likely than other students to be suspended for 1 to 5 days, 6 to 10 days, or for more than 10 school days. No students with IEPs from any race/ethnicity group is more likely to be suspended compared to students from other racial/ethnic groups.
- ***Behavior Specialist Support.*** The district's two behavior specialists are supporting a new promising initiative involving 15 schools with emotional impairment programs.
- ***Assistive Technology.*** Parents and teachers have access to the district's assistive technology information center's (ATTIC) lending library. The Lending Library has thousands of pieces of assistive technology equipment, books, hardware, software, switch-activated toys, and more, available to borrow.
- ***Interventions.*** The district has begun to implement Voyager-Sopris Passport Journeys in the specific learning disability and mild cognitive impairment programs. However, if the program is being used in a balanced-literacy type setting, it may need to be augmented with additional foundational reading materials.
- ***Center Program Resources.*** Generally, center school programs have sufficient and appropriate material and resources, including assistive technology.
- ***Randolph Career Technical Center.*** The CTC offers half-day programming to prepare students for various construction trades; marketing; heating, ventilation and air conditioning. Some 83 students with IEPs (27 percent) participate.
- ***Drew Transition Center.*** The center provides students with IEPs from 18 to 26 years of age with the opportunity to work at community-based sites. Although students are not paid, they gain experience at such businesses as: Marriott, Chili's, TJ Max, etc. Several students transitioned to competitive employment after they left secondary school.
- ***Professional Learning.*** Compared to other urban districts where Council team has conducted reviews, DPSCD has set aside more time for professional learning, including before the school year begins, weekly opportunities for schools with elementary/middle grades, regular sessions for center school personnel, and monthly meetings for related services personnel. Plans are being made to improve the quality of training for special education personnel. On-line modular training is reportedly being explored.
- ***Parent and Community Involvement.*** DPSCD has a strong group of parents and community representatives who expressed interest, and desire to support DPSCD in the future. They would like to form a parent organization to formalize their collaboration with the district. With the new administration, there has been more timely responses by principals and new

special education leadership. Parents appreciated the superintendent and his wife's participation in the town hall meeting held earlier this school year, which included board members and some 400 people. A positive relationship has developed between several parent representatives and the senior executive director for special education.

OPPORTUNITIES FOR IMPROVEMENT

The following provide opportunities to improve teaching and learning for students with disabilities.

Early Childhood

- ***Early Childhood Achievement Outcome Reporting.*** The district's report on early childhood SPP indicators showing that no students who entered the program below expectation had substantially increased developmentally upon exiting in all three areas measured, and similar data on children meeting age expectations by the time they exited the program raises questions about data and reporting accuracy.
- ***Educational Environments.*** Lower percentages of district students with IEPs were educated in regular preschool settings and higher percentages in separate settings compared to Wayne RESA, the state, and the nation.

State Assessments for Students with IEPs

- ***ELA.*** Some 18.7 percent of students scored proficient/above in English language arts in 2015-16, down from a high of 40.7 percent in 2012-13. The decline may be related to changes in the assessment.
- ***Math.*** Similarly, 18.8 percent of students scored proficient/above on math in 2015-16, down from the high of 36.2 percent in 2012-13.
- ***Alternate Assessment.*** The percentage of students with significant cognitive disabilities taking alternate assessments was 5.8 percent in ELA, 5.7 percent in math, and 5.5 in science. This exceeds the 1.0 percent benchmark set under ESSA, and consequently MDE will require DPSCD to justify the high alternate assessment rates and will monitor IEP alternate assessment decisions. The district will have to address the participation rates of students with IEPs in statewide assessments since they are below the 95 percent threshold.

Educational Environments

- ***Generally.*** District students with IEPs receive instruction in general education environments most of the time at much lower rates than Wayne RESA, the state, or the nation; and in more restrictive environments (separate classrooms and center schools) at much higher rates. The district rate remains about the same when excluding students living outside of Detroit. For instruction in general education classes at least 80 percent of the time, rates are highest in grades 1, 10, and 11. In separate classes, rates are highest in grades 7 and 8. Center school rates are highest in 9th and 11th grades.
- ***Disability Disparities.*** Arabic students are 4.43 times more likely than other students with IEPs to attend a center school. Excluding Arabic students living outside the district, the risk ratio decreases somewhat to 3.9.

Out of School Suspensions

- ***Informal Removals from School.*** Reportedly, all out-of-school suspensions are not being recorded properly, and instead students are being sent home "unofficially."
- ***Eighth Grade.*** The highest number of suspensions for both students with and without IEPs is at the eighth grade.

General Support for Students

- ***Inclusive Instructional Support.*** During focus group discussions, little emphasis was given by interviewees on co-teaching, structured time for collaboration and discussion, or joint professional development for general and special educators to support inclusive instruction. Participants indicated the need for stronger collaboration between general and special education teachers, more support of students with IEPs in general education classes, and clearer roles.
- ***Interventions.*** Relatively few intensive interventions are available to accelerate literacy. Students in resource classes do not always receive education to support instruction based on core curricular standards or to accelerate achievement.
- ***English Learners.*** Once ELs are identified as needing special education, there is little support to address their language acquisition needs, unless the student is in a school specializing in bilingual education.
- ***Assistive Technology.*** There were concerns that students who would benefit from assistive technology sometimes do not receive it, especially among students who are nonverbal.
- ***Staff Shortages.*** Significant special education teacher shortages affect class sizes and contribute to students having teachers without the experience and training necessary to be effective.

Configuration and Impact of Specialized Programs

- ***Schools Hosting Specialized Programs.*** Schools vary significantly in having specialized program classes, with 26 schools having no classes, 1 high school having 9 classes, and 1 school with elementary and middle school grades having 13 classes. Hosting large numbers of specialized classes affects the ability of principals to support inclusive educational opportunities, intensive interventions, and transportation services.
- ***Percentage of Students with IEPs by School.*** Discrepancies by school in the numbers of specialized classes produce large variations in school percentages of students with IEPs. The percentage of students with IEPs varies from 1 percent to 56 percent. One school, which is one of three small high schools in one building, has the highest IEP percentage. Only one specialized program class (ASD) is offered at the four high schools having an examination requirement.
- ***Specialized Program Variety.*** DPSCD has 14 different specialized programs for school-aged students. The programs mirror the description of specialized programs in Michigan's Administrative Rules for Special Education and Wayne RESA regional plan, which sets maximum student-to-personnel class ratios. There were significant concerns that many classes exceeded these ratios. In addition, unlike many other school districts visited by the Council's team, DPSCD's configuration of services appears to be unduly categorical. The

team was informed that MDE does not require use of programs with these categorical names.

- ***Notable Specialized Program Configurations.*** The following are notable specialized program configurations—
  - ***SLD Program***. DPSCD educates 12 percent of students with SLD less than 40 percent of the time in general education classes, compared to 3 percent in the state and 5 percent nationally. Although most students with specific learning disabilities typically receive instruction on core academic standards, SLD programs have 31 classes at schools with elementary and middle grades and 15 classes at the high school level. This program is meant for students with high incident disability areas of SLD, emotional impairment, or other health impairment who require direct instruction in all four core curricular areas. The proportion of specialized program classes for SLD is higher than most other districts the Council team has visited.

    The age span of students in these classes may not be more than the age span of students without disabilities in the building, and in elementary buildings the age span may not be more than six years--whichever is less. Considering the rigor of academic standards that students must master, instruction can be challenging in classes with such large age differences. The area of SLD has the third largest number of specialized classes (46) in the district, followed by autism spectrum disorder and mild cognitive impairment (62 and 61, respectively).
  - ***SXI, SCI, Work Skills, and Project Search Programs.*** These specialized programs are offered only at center schools. Although it is common for other school districts to house postsecondary transition programs for older youth in developmentally appropriate environments outside of regular high schools, it is not common that classes for severe multiple impairment and severe cognitive impairment programs be offered only in center schools.
  - ***PI and POHI Programs.*** With 14 classes at the elementary and middle school level, no classes were offered at the high school level.
  - ***EI Program.*** No EI classes are offered in regular high schools. However, while figures show that no students with emotional impairments are educated in separate schools (exhibit 3j), other district data show 10 EI specialized program classes at center schools (exhibit 3z).
- ***Transportation.*** Some 40 percent of students with IEPs are provided door-to-door transportation. Contributing to this rate is the disparate placement of specialized programs in schools based on school-by-school agreements to host such programs, the absence of a master plan for establishing programs, and the lack of an effective protocol to guide IEP transportation decisions. Transportation is also affected by long travel times and delays in data entry. Also, when school personnel do not exit students, new schools cannot enroll them and initiate new transportation routes. Students remain at home until the situation is resolved when parents are unable to provide transportation themselves.

Center Schools

- ***Placement Rate.*** With a maximum Michigan state performance plan target of 4 percent for students with IEPs attending a separate school, the DPSCD rate is 12 percent compared to 6

percent in Wayne RESA, 5 percent for the state, and 3 percent nationally. The opening of ANY new center schools will increase the district's already disproportionately high rate and result in more restrictive educational environments for students currently attending regular schools.

- ***Turning Point Schools.*** The district's two programs for day treatment have moved from separate buildings to regular schools, but they operate as separate schools. Reportedly, students who should be on a diploma track are issued a certificate of completion because teachers who are certified to teach core curriculum classes are not available and some required courses are not offered. Also, instruction is impacted by student behavior, procedural safeguards are reported as not consistently followed for suspensions, and instructional materials are insufficient.
- ***Wayne RESA Plan.*** The district needs to clarity roles and responsibilities of administration and staff members for meeting requirements on the Wayne RESA Plan for the Delivery of Special Education, the Act 18 Agreement, the Act 18 Budget process, and center program procedures.

Placement Center

- ***Centralized Placement.*** Students with IEPs who are new to the district or who have moved from one residence to another are not able to (re)enroll in a new school (like students without IEPs) and must go through the district's centralized placement center for a new school.
- ***Students Waiting for Placement.*** Because of staff shortages and little to no space available in some specialized programs, there are students at home awaiting placement. Homebound services are not provided because the service is not medically necessary.
- ***Concerns.*** Focus groups expressed concerns about the placement center's use of one phone line; wait-times for center staff assistance; rejection of students referred by the placement center at schools claiming they lack appropriate services; insufficient paper work provided to serving school; insufficient staff to perform caseload "close out processes;" and confusion about temporary placements.

Secondary Transition and Activities

- ***Graduation Rate.*** Between 2011-12 and 2015-16, the four-year graduation rates for students with IEPs increased 1 percentage point from 47 percent to 48 percent, and the six-year rates decreased from 64 percent to 54 percent. While a slight improvement, these rates are very low.
- ***IEP Goals.*** With a 100 percent compliance requirement, 85 percent of students had IEPs with required transition components.
- ***Career Technical Centers.*** There are insufficient resources to support all students with IEPs in highly technical CTC courses, and students need to be better prepared to make decisions about what to study.
- ***On-Site Job Training.*** There are limited opportunities for students with IEPs to engage in work experiences, such as those offered at the Drew Transition Center for students 18 years and older. Currently there is not a strong collaboration between external partnerships and special education to support students with disabilities and community-based internships.

- ***Activities One Year After Leaving High School.*** Among former DPSCD students with IEPs within one year of leaving high school, rates were somewhat below state targets in their: a) enrollment in higher education (28.6 percent with 33.2 percent target); b) category "a" plus competitively employed (57.1 percent with 60.0 percent target); and c) categories "a and b" and other postsecondary education or training programs (64.3 percent with 72.5 percent target). Attaining higher local targets could be achievable with focused activities.

Professional Learning

- ***Need.*** There is considerable need for joint professional development for general and special educators at the school level, especially among principals, to support more inclusive and effective instruction.
- ***Types of Training.*** Training is needed in areas such as general education accommodations, collaboration between general and special educators, supplemental intensive interventions, co-teaching, and the like. Other areas where more professional development is needed include IEP development, procedural safeguards related to the removal of students from class and school, dyslexia, and Section 504 requirements. There was a perception among interviewees that there was insufficient time available for professional learning.

Parent and Community Involvement

- ***Concerns.*** Concerns raised by parents included implementation of IEP accommodations in advanced classes and IEPs in general. Parents also raised issues around behavior intervention plans; disrespect by some principals; lack of a structured process for parents to report concerns; knowledge of school-based personnel; "unofficial" student removals in lieu of formal suspensions; and implementation of PBIS and restorative practices.

RECOMMENDATIONS

3. ***Review of Data Related to Teaching and Learning.*** Assemble a multidisciplinary team and review achievement data (exhibits 3a, 3c-g, and 3dd-ee); suspension data (3m-o); educational environments (3g-l); special program configurations (3p-u, 3w, 3z, and 3bb), students from other districts (3v); percentages of students with IEPs by school (3x); and other relevant data. Develop hypotheses around the patterns of results found and set goals for improvement as the district implements the Council team's recommendations and other proposals. Build strategies around each improvement goal, especially Recommendation 4 that is intended to improve inclusive and high-quality teaching and learning. Assess the resources and supports needed to implement each strategy.

4. ***Expansion of Inclusive Education and Provision of High Quality Instruction and Supports.*** Begin the process of providing special education services in more inclusive educational settings to students with disabilities to ensure more equitable access to school choice and high-quality instruction. To build a culture and climate for this purpose, consider using an experienced consultant who has had successful outcomes in this area to help facilitate planning and implementation. [76]

[76] The suggested activities are not intended to be a blueprint or to be exclusive. They are provided for discussion purposes and further development.

a. ***Inclusive Education Vision.*** Establish a school board policy[77] stating a clear and defined vision for DPSCD on the value of inclusivity and that reinforces the district's commitment to improving academic achievement and social/emotional well-being for students with disabilities.[78] Highlight the importance of central office support and principal leadership for providing students with IEPs with the differentiated and scaffolded instruction they need to learn in general education settings. State that a student's needs - not their disability label - should drive the type or location of services. Expect that students will receive rigorous core instruction that is linguistically appropriate and culturally relevant. These expectations should be within greater reach when school personnel are provided the resources and supports they need, and as teachers become more familiar with and base their instruction on the principles of UDL. At the same time, the district's vision should underscore the importance of evidence-based academic and positive behavior interventions/supports. Furthermore, once students are receiving special education instruction, the intensity of interventions should be stronger than (not less than) interventions otherwise available to students without IEPs.[79]

b. ***Implementation Plan.*** With the multidisciplinary team assembled pursuant to Recommendation 3, develop a written multi-year action plan that calls for written expectations, professional learning, data analytics, and accountability. To the extent reasonable, embed components in the MTSS implementation plan referenced in Recommendation 1b. Consider the data review referenced in Recommendation 3. Once the plan is completed, establish a way for school-based teams to embed local implementation activities into their strategic school designs and school improvement plans.

   As part of this process, identify a cadre of schools that volunteer to take the lead in planning and implementing inclusive service designs. Phase in this process over about four years to include all schools. Also, identify general and special education personnel that schools can contact to support their implementation efforts to better meet the needs of students with IEPs.

   Communication. When finalized, prominently post the implementation plan on the district's website, along with relevant links to district information and publicly available resources. Communicate the plan widely to all internal and external stakeholders, including parents who are English learners, and share the purpose and expected outcomes of the plan.

   Consultant. Hire a consultant who has experience with and positive outcomes in reducing the restrictiveness of educational environments of students, implementing interventions for students with dyslexia, autism, vision/hearing impairments, and improving achievement and positive student behavior generally. This action will expedite effective planning and implementation and serve as a sounding board for DPSCD staff.

[77] See, for example, one district's inclusion policy and related documents, retrieved from https://www.district65.net/Page/812

[78] Language from the Common Core State Standards website may be helpful for this purpose. Retrieved at http://www.cPorestandards.org/assets/application-to-students-with-disabilities.pdf.

[79] Board policy shall EXCLUDE the creation of separate school sites for autism, hearing or vision impaired or for dyslexia. Council team does not support any further segregation of SwD in DPSCD.

Components. When developing the implementation plan, include the following components—

- ***Early Childhood.*** Increase the number of children educated inclusively in regular preschool classes--with no more than 50 percent and close to 30 percent of classes composed of children with disabilities. The Council team can provide DPSCD with names of other school districts that have done so effectively. When more children are successful in inclusive classrooms, there will be higher expectations that these opportunities will continue in kindergarten, enhance equitable school choices, and spur high-quality education for students with disabilities.
- ***Differentiated Instruction.*** Provide linguistically appropriate and culturally competent instruction aligned with core standards, differentiated for students with reading and math performance significantly below those of their classroom peers.
- ***Effective Instruction Based on Core Curricular Standards.*** Improve instruction aligned to core curricular standards and expand increasingly intensive interventions, especially in literacy and math, to reinforce standards-based instruction. Consider augmenting the commercial reading and programs with additional foundational materials that would address alignment issues.[80] Specify interventions in English language arts and math that are evidence-based and can fill instructional gaps for students with IEPs who are behind academically. Provide for flexible groupings of students when there is a need for common interventions, and adjust the groupings based on changing student needs.
- ***Planned Collaboration.*** Expect collaboration among general and special educators, paraprofessionals, and related-services personnel in providing instruction and interventions for students they have in common.
- ***Positive Support for Behavior.*** Enhance the knowledge of and supports for teachers who work with students with challenging behavior to reinforce time engaged in teaching and learning. Plan for the expansion and identification of personnel available for observing classrooms, modeling effective practices, and coaching in schools with no other internal expertise. Also, undertake activities needed to support the development of meaningful functional behavior assessments and behavior intervention plans.
- ***Elimination of "Voluntary" Out-of-school Suspension.*** Explicitly prohibit sending students home "voluntarily" in lieu of a formal suspension with documentation and notice to parents.
- ***English Learners with IEPs.*** Bring together personnel from the English learner and special education departments, along with others with instructional expertise, to articulate necessary interventions for ELs with IEPs. Based on a review of current models, identify best practices in the systemic implementation of special education and language acquisition strategies.[81]

[80] See the analysis of materials conducted by Student Achievement Partners.

[81] See, for example, "Background and Resources for the English Language Learners – Students with Disabilities Guidance," retrieved from http://www.p12.nysed.gov/specialed/lawsregs/documents/regulations-part-200-201-oct-

- ***Advanced Classes.*** Review gaps in the provision of IEP-accommodations for students taking advanced classes to identify necessary steps to meet student needs.
- ***Specific Learning Disabilities Program.*** Review the SLD program to determine how more students could receive core instruction in general education classes, supplemented by evidence-based intensive interventions designed to accelerate literacy. Address the large proportion of students with IEPs who have poor reading skills, and the high percentage of those students likely to have dyslexia.[82] School districts with which we are familiar have established clustered programs with evidence-based intensive interventions. They often find that centralized approaches reach *some but not every* student who would benefit from such interventions. Having all such students attend a centralized program is neither realistic nor advisable. A combined menu of intensive interventions designed to address various reading, writing and other needs – along with professional development for general and special education personnel to deliver the interventions – is necessary to reach a larger number of students with need.
- ***Support for Students with Vision/Hearing Impairments.*** Identify service gaps and school districts that have high outcomes among students with these disabilities when educated in regular schools. The Council can offer examples of such school districts.
- ***Flexible Service Delivery Models.*** Define effective models for supporting students in general education classes using a flexible service model. Such models should 1) improve teaching/learning of students in general education classes using a flexible service delivery model; 2) expand options for students who would otherwise attend specialized programs to receive more effective instruction in general education classes; 3) support English learners with IEPs to address their language acquisition needs as well as their instructional needs related to their disabilities;[83] 4) schedule common planning time for special and general educators who work with the same students; and 5) increase the proportionate share of students with IEPs at schools with low percentages.
- ***Special Program Configuration.*** Review DPSCD's special program configuration and investigate with Wayne RESA other special program configurations in other RESAs that enable schools to offer clustered instruction based on student needs rather than categorical disability areas. Plan to modify the current program configuration to put more emphasis on common learning needs rather than disability characteristics. Ensure that each specialized program is available at all grade levels and that all programs, including those for students with severe cognitive impairments and severe multiple impairments, have classes available in regular schools.
- ***Master Plan.*** Develop a master plan for the equitable placement of specialized programs across the district. Include facilities and transportation personnel in these discussions.

2016.pdfhttp://education.ohio.gov/getattachment/Topics/Other-Resources/English-Learners/ELL-Guidelines/Guidelines-for-Referral-and-identification-of-1/ELL-SWD_partIII.pdf.aspx.

[82] See, for example, Statistics on Dyslexia, retrieved from https://www.dyslexiacenterofutah.org/dyslexia/statistics/.

[83] Engage personnel from schools with dual language and bilingual programs, along with other central office personnel and Wayne RESA. .

- ***Emotional Impairment Program.*** Review the emotional impairment and day treatment programs. Ensure that by next school year there are sufficient supports for students who need high intensity interventions at the high school level in regular schools, and that students in day-treatment programs have access to courses leading to a high school diploma.
- ***Reliance on Center Schools.*** Determine the types of instruction, services, and physical and material resources necessary to effectively educate in regular schools those students who would otherwise be placed in center schools. Collaborate with Wayne RESA on this. Include visits to other school districts in Michigan and elsewhere to observe regular schools successfully educating these students.
- ***Parent Communication.*** Outline how information can be better shared with parents about options for their children to be educated effectively in more inclusive settings. Collaborate and communicate with parents more effectively.
- ***Disproportionate Special Education Enrollments.*** Review schools with enrollments having disproportionately high and low SPED enrollments and address the proximate causes of these disparities. Reduce the high proportion of students with IEPs at Detroit Institute of Technology at Cody.
- ***Transportation Protocol.*** Develop a protocol for IEP teams to determine student need for door-to-door transportation, specialized equipment, etc. Include transportation personnel and other stakeholders in the protocol's development.
- ***Postsecondary Transition Planning.*** Determine how IEP teams can be provided with practice and feedback on written parameters used for state monitoring of postsecondary transition expectations. Collaborate with Wayne RESA in this process.
- ***Path to Graduation.*** Based on data and focus group feedback, identify and act on the most common reasons students with IEPs do not graduate with a diploma, e.g., access to courses necessary for graduation, failing grades, absences, etc.
- ***Training for Careers.*** Identify the gap between students needing career training and options available, the resources necessary to support their training needs at career technical centers, and activities needed to fill gaps.
- ***Community-based Job Training.*** Expand opportunities for students who would benefit from community-based job training, including students in regular high schools. Use the resources and expertise of external partners to assist with planning and execution.
- ***Placement Center.*** Take steps to implement a school-based enrollment process for schools of various types that would be inclusive of all students with IEPs, including:
  - ***Records.*** Obtaining records from prior schools and school districts;
  - ***Interim Services.*** Determining how interim services could be provided at local schools if it is ascertained that the school does not have the resources currently available to meet a student's IEP-identified needs.
  - ***Communication.*** Processes for communicating with receiving schools and with parents.
  - ***Immediate Concerns.*** Address immediate placement center concerns, e.g.,

increasing the number of phone lines, reception of parents, etc.

- ***Time Frame.*** Specify the maximum time frame (not to exceed 10 days) for identifying optional schools for students when necessary, arranging for transportation, and facilitating student transfers.

- ***Immediate Instruction and Service Delivery.*** Eliminate the need for students to be home waiting for placement.
- ***IEP Decision Making.*** Establish worksheets for IEP teams when they are considering–
  - ***General Education Classes.*** Students' education in general education classes and supports needed for core instruction and evidence-based interventions.
  - ***Special Programs.*** Students' learning levels in specialized education programs. Clarify that low grades (without an examination of appropriate instruction, interventions, and supports provided) should not drive placement.
- ***Assistive Technology.*** Consider resource gaps with students who would benefit from assistive technology, especially those who are nonverbal, and how to expand their access to devices and services.
- ***Wayne RESA Plan.*** Clarify for all relevant administrators and staff members their roles and responsibilities regarding the Wayne RESA Plan for the Delivery of Special Education, the Act 18 Agreement, the Act 18 Budget process, and center program procedures. Build this into the implementation plan.
- ***Parent Concerns.*** Collaborate with parents on the creation of a special education advisory council for each cohort, and possibly a districtwide advisory council. Also, consider structured ways that parents could voice their concerns on a regular basis, beginning at the school level and continuing through the cohort level. Determine how special education department personnel would support this process. Consider how concerns will be documented and addressed within a reasonable time frame.

Feedback. Collect feedback on the draft improvement plan from stakeholders at varying grade levels, and among special/general education administrators, principals, general/special education teachers, related-service providers, teacher assistants, parents, and community-based organizations. Continue this feedback loop as the plan is implemented to identify and address concerns.

c. ***Written Expectations.*** As part of the implementation plan described in Recommendation 4b, develop written expectations on each plan component. (Coordinate with Recommendation 2c.)

d. ***Differentiated Professional Learning and Parent Training.*** Embed in the professional development curriculum (Recommendation 1e) content needed to carry out Recommendation 4. Embed into current walk-through protocols indicators associated with implementation plan components that the district expects to be in place within a specified time-frame.

In addition, consider –

- How training will be provided using a multidisciplinary and interdepartmental approach, so that professional learning to promote inclusive education is not viewed

incorrectly as a "special education" initiative;

- How and when all personnel will be trained in each critical area;
- How key information will be communicated effectively, including the use of on-line training for compliance issues that are more rote in nature;
- How information will be used;
- How all stakeholder groups will be included, e.g., principals, general and special educators, clinicians, paraprofessionals, etc.
- What additional coaching and supports may be needed;
- Principal leadership training necessary to maximize and leverage inclusive and high-quality instruction and supports, including training on flexible uses of school-based budgets to expand inclusive education; and
- Engaging Wayne RESA and stakeholders on expanding training opportunities for parents.

*e. **Data Analysis and Reports.*** In addition to activities proposed in Recommendation 1e, embed in school performance and planning frameworks--

- ***Data Reporting.*** The types of data needed to better target patterns and areas of concern.
- ***Risk Ratios.*** Report disparities using a risk ratio to better understand district practices and their effects.

*f. **Monitoring and Accountability.*** Expect all principals to be responsible for overseeing special education in their buildings and hold them explicitly accountable for such. Articulate how cohort principal leaders will work with their principals and how they will exercise their responsibilities to ensure principals are serving students with disabilities. Embed the following activities into the monitoring and accountability systems described in Recommendation 1g. and 2f.

- ***Data Checks.*** Include information on students with disabilities in data discussions to inform follow-up actions and track outcomes. Ensure that data includes all SPP indicators.
- ***Fidelity Assessments and Walk-Throughs.*** Review walk-through tools used to support instruction and interventions in general education classes, resource classes, and special programs to see how students are being taught. Initiate technical assistance, professional development, coaching, and mentoring to improve practices.
- ***Timely Communication and Feedback***. Establish a process for timely feedback to the district's MTSS leadership team on barriers to inclusive education.
- ***Monitor.*** Monitor and follow up on –
  - ***Informal School Removals.*** Students who are sent home without documenting out-of-school suspensions.
  - ***Placement.*** Extent to which students receive placements within expected time frames.
  - ***Waiting for placement.*** Students at home while waiting for placement.

- ***Too High Caseloads.*** How special education teacher caseloads can be monitored on a continuing basis using electronic data that is gathered at the school level.

IV. Support for Teaching and Learning for Students with Disabilities

This section summarizes DPSCD's supports for teaching and learning for students with disabilities. The section covers interdepartmental collaboration, administration and operation of special education, compliance issues, fiscal issues, and accountability.

Interdepartmental Communication and Collaboration

Given concerns about student achievement and social/emotional wellness generally, and issues surrounding the high costs and legal implications of special education, it is essential that central office staff and school leadership collaborate effectively to leverage their collective management and operational resources.

The Council team heard repeated concerns from all focus groups about the lack of communications of the district's organizational changes, shifts in roles and responsibilities, direction, and vision. There were similar concerns about communications with the Michigan Department of Education. In its systemic state improvement plan for special education (SSIP), MDE acknowledged that it has traditionally functioned as a regulatory agency with limited cross-office collaboration. This lack of state-level alignment has resulted in a lack of coherence and conflicting expectations, systems, and improvement activities in the state's local districts. According to the SSIP implementation plan, MDE is expected to improve their collaboration and approach to district improvement in a systemic way, leveraging resources with a tiered model that will help build capacity of local districts to improve outcomes. It appears from the Council team's interviews that some of DPSCD's organizational issues mirrored challenges MDE is addressing in its SSIP.

Interview and Focus Group Participant Feedback

Interviewees voiced the following issues and concerns about the interaction and collaboration across various central office departments and other entities to strategize and problem solve around common issues involving special education.

- ***Cabinet Meetings.*** The superintendent meets with his cabinet weekly.
- ***Special Education Director Involvement.*** The senior executive director (director) for special education does not participate in cabinet meetings. In her absence, the deputy superintendent (deputy) represents special education. The deputy also represents other areas under her supervision, and the issues involving special education have been in existence for years, are persistent, significantly affect schools and students, and are costly.
- ***Academic Leadership.*** A strong collaborative relationship appears to exist between the deputy and senior executive director for curriculum and instruction (C/I) who reports directly to the superintendent. The deputy and C/I senior executive director are jointly leading academics in the absence of a chief academic officer. The two leaders meet weekly with each other, and sometimes with others of their teams to discuss their respective work.
- ***Regular Communication.*** According to interviewees, regularly scheduled communications appear not to be occurring between C/I and the deputy's academic-related leaders, including principal leaders, special education, English language learners, etc. As a result, information is not being adequately shared on upcoming plans around such areas as MTSS development;

curriculum framework development and adoption; organizational structures; special education roles and responsibilities; and how various institutional components can be leveraged and coordinated.

- ***Principal Leaders.*** Principal leaders meet with the deputy weekly. Except for the cohort five principal leader (who reports directly to another deputy), the leaders have not been explicitly authorized to meet with their respective principals. Currently, all principal leaders meet as a group with the deputy. The special education senior executive director does not attend these meetings, and the deputy addresses any special education issues. The Council team was told that it would be helpful if the principal leaders could meet with their respective principals and with the special education director on a regular basis to address and resolve school-based special education issues. They also indicated that they have a general idea of C/I planning, but more in-depth information would be helpful.
- ***Special Education Liaisons.*** Although a special education liaison is assigned to each cohort, they have not had an opportunity to establish an ongoing working relationship with their respective principal leaders. Not all principals and principal leaders know about the special education liaison or have met with their respective special education liaisons.
- ***Collaborative Relationships.*** Strong individual relationships have been established between special education office personnel and others, such as the district's compliance lawyer, general counsel attorneys, and staff members from English language learners and transportation departments.

Administration and Operation of Special Education

With new DPSCD leadership beginning in May 2017 and the appointment of a new special education director at the beginning of the school year, there have been many changes in staffing and organization. This section addresses the special education department's current organizational structure and focus group issues about organizational changes.

Special Education Organizational Structure

The special education department is organized around units of individuals defined by the five cohorts, compliance, and ancillary personnel. Each unit, however, does not have a formal "leader" as such. Instead, at least on paper, there are some 22 supervisors, including five vacant positions and 3 directors who report directly to the senior executive director. Informally, one individual has assumed the lead in some units. Although staff members are striving to make this structure work, it was not clear to the team how it could translate into supervisory accountability.

- ***Cohort 1***. In addition to supporting schools in cohort 1, personnel in this cohort include nine supervisors in the following programmatic areas: developmental disabilities, physical and other health impairments, dual diagnosis (CI and EI), autism spectrum disorder, severe multiple impairment, severe cognitive impairment, physical impairment, moderate cognitive impairment, emotional impairment, visual impairment, work skills, Project Search, and orientation/mobility. In addition, 20 teacher consultants and 2 specialists support various functions.
- ***Cohort 2***. One supervisor is assigned to cohort 2.

- ***Cohort 3***. One supervisor is assigned to cohort 3, along with a director for foster care and early childhood special education programs.
- ***Cohort 4***. One supervisor is assigned to cohort 4.
- ***Cohort 5***. Two supervisors are assigned to cohort 5--one for occupational and physical therapy and the second for postsecondary transition, who is assisted by two transition specialists.
- ***Compliance***. With three supervisors, this unit is responsible for compliance and complaints (assisted by five IEP specialists); placement; and Medicaid.
- ***Ancillary.*** This unit has one director, one interim deputy executive director, and eight supervisors. Each one is responsible for psychologists and Project Find; social workers and interns; health and physical education; speech/language pathologists; audiologists and Section 504; social workers; early intervention and limited licensed social workers; and nonpublic, assistive technology, and limited-licensed psychologists. Eight additional staff members support various other functions. The supervisors evaluate their respective personnel, but the personnel are not assigned by cohort.

The team would anticipate that a special education liaison would support the schools in each cohort under the guidance of a principal leader. This would a preferred organizational structure to support schools, but it has not been realized because cohort personnel continue to have supervisory responsibility in addition to many schools to support. As a result, supervisors have little time to meet with principals or their leaders. The liaisons' small bandwidth and large scope of responsibilities makes the current structure untenable, and the structure is not reasonably calculated to maximize support to schools. The combination of new personnel, uneven roles and responsibilities, and little time to meet with principals is not an optimal organizational arrangement.

The special education leadership team meets with the senior executive director on a weekly basis, but the special education department has not yet met together. Staff members want to be more collaborative and proactive than reactive, but they are not there yet.

Focus Group Feedback about Special Education Department Operation

Several themes emerged from interviews about the management and operation of special education, including the authority of the senior executive director, the reorganization of department personnel, and coordination with Wayne RESA.

Senior Executive Director Authority

There was a widespread perception among interviewees that the deputy superintendent for schools has taken on the leadership role for special education and the executive director now lacks the authority to direct, supervise, and make necessary decisions within the department. In other words, she has not been given the standing that a typical special education leader would have to carry out her responsibilities, including communications with principals. These circumstances, in part, may be due to the superintendent's and deputy's long-standing working relationship from their prior school district, the deputy's experience with special education, and the significant and complex issues that special education presents. However, a by-product of the deputy's tight

oversight (on top of her expansive responsibilities in other areas) has been an uneven flow of information that has affected special education service delivery and operations. An example involved the senior executive director's not being invited to the oral debriefing on this project with the superintendent and deputy, even though one of her responsibilities was to "complete the special education audit with the [Council of the Great City Schools]." As this report was drafted in April 2018, the senior executive director had still not been formally debriefed by the deputy superintendent.

Other issues impacting the management and operation of special education emerged as well. One involved a concern that the senior executive director was "spread too thin," which was not surprising based on the number of her direct reports. Some interviewees believed, however, that delays in decision-making reflected "control" or "oversight" issues rather than span of control problems.

Reorganization of Special Education Personnel

The 2017-18 school year began with all but 3 of 22 supervisors having new positions and roles. Upper level leadership believed that the current structure required immediate attention. And it acted on them expeditiously. These changes, however, raised concerns among both school personnel, parents, and other stakeholders that staff expertise and voice were not taken into account. There was a view among some that new leadership essentially dismantled special education. Feeding this perception were personnel cuts and a decision at the beginning of the school year to redeploy special education department staff with teaching credentials to fill teacher vacancies as substitutes. Reportedly, these personnel received one day's notice before they were to report to their assigned classes. Staff were concerned about the undefined length of time these teachers were to be deployed and how their prior responsibilities would be covered. Not surprisingly, personnel morale was reported to be low and willingness to voice concerns was tentative for fear of retribution. In some respects, the team was not surprised that staff felt disrespected on the heels of the state's long-term "takeover" of the district when a lot of people believed that their voices were not heard.

Personnel changes in special education have also created some confusion in the field about who to contact on various special education issues.[84] Several focus group members indicated that now was the time for "overcommunication" among all stakeholders.

Another complicating factor is the impact of Detroit's Organization of School Administrators and Supervisors (OSAS). Unlike most other urban school districts, when administrative positions in Detroit are eliminated remaining administrators may use their seniority to bump or automatically claim open positions for which they are qualified. Interviewees, however, frequently raised concerns about whether positions were being filled with individuals who were truly qualified.

Coordination of Wayne RESA

Act 18 services for students with moderate to severe disabilities are funded by Wayne RESA. These services include special education/related services in center schools and approved

[84] There is also confusion about who to call in other departments because of reorganized personnel.

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individual student aides. According to Wayne RESA staff, they have developed positive relationships with DPSCD special education leadership; are communicating regularly about issues of concern; and see progress. Also, RESA reported that the director was developing a positive presence in the community and with principals. The Council team generally saw hard working and dedicated staff in the special education department itself. Nevertheless, staff shared outstanding issues about the department's organizational structure and communications. These issues have been shared by the Council with both the deputy of schools and senior executive director.

To address outstanding issues, Wayne RESA staff have recommended that the district:

- Have the senior executive director participate in cabinet meetings;
- Assign supervisors and staff with proper credentials and approvals;
- Clarify the role of the Act 18 to supervisors and building principals;
- Develop a communication plan that is comprehensive and seamless; and
- Ensure supervisors consistently attend Coordinating Council/Region meetings.

The Council team supports these recommendations.

School-based Support for Special Education Management and Operation

The delivery of special education and related services is a shared responsibility between building administrators and central office supervisors. Principals, lead teachers, and special educators have important roles in this process.

Principals

Principal leadership varies by school, with some leaders who are very involved with the operation of special education; and others who are not as engaged and exercise little oversight authority over either special education or bilingual education. However, there was nearly universal recognition that most principals had not received the training they needed to be effective in these two areas or to be held accountable for effective operations and better results. Generally, principals welcomed the opportunity to receive more training on special education compliance and on how they could improve their ability to produce better results. This is not likely, however, unless DPSCD gives principal training in this area higher priority. Nonetheless, one positive development now is the regular participation of principals in school walkthroughs that include special education classes. To be effective, however, principals need clearer protocols to guide meaningful classroom observations.

Lead Teachers

It is expected that each school will have a lead teacher who acts as a liaison with the special education department, but this expectation is not consistently implemented. Lead teachers are a valuable school resource and have important coordinating roles that involve monitoring timely special education meetings; reporting student counts and caseloads; and supporting compliant practices.

According to interviewees, there were several concerns about the lead teacher role and their ability to carry out their responsibilities. Some of these concerns included--

- ***Problem-Solving.*** When lead teachers have a problem that they or their principals cannot resolve, neither one is clear about who in the special education department to contact for help. This problem is exacerbated when either the lead teacher or principal is not very knowledgeable about specific special education procedures and requirements.
- ***Scope of Responsibility.*** Compliance is difficult to manage when a school has one lead teacher and many programs, such as 13 in one school.
- ***Protocol.*** There is no well-known protocol to support lead teachers in carrying out their role and responsibilities.
- ***Training.*** Lead teachers are expected to attend training sessions to learn about new special education requirements, and in turn provide training to school-based special educators and others. These meetings are not consistently attended by all lead teachers.
- ***Volunteerism.*** Lead teachers do not receive a stipend or have a reduced case-load. As a result, some principals are unable to find a special educator willing to carry out this voluntary role. In such cases, no lead teacher is available to go to training sessions, leading to more compliance issues.

Case Management

Special education teachers carry out case management responsibilities for students on their caseloads. In this capacity, they are required to schedule all special education-related meetings with parents, including coordinating with and sending notices to all meeting participants. They, along with related-service providers, are expected to monitor their due dates for reevaluations, and annual IEP meetings. The case managers are supported by special education department-initiated reports on upcoming due dates and coaching by IEP specialists. According to focus group participants, it is difficult for special educators to carry out their case management responsibilities because of their many other competing priorities (e.g., teaching), finding coverage for their classes, getting required participants to attend meetings, and fitting meetings into their block of prep time when the allowable time frame is too small.

Special Education Related Staffing Ratios and Information

This subsection presents data on staff-to-student ratios in special education, i.e., special educators, paraprofessionals, speech/language pathologists, psychologists, nurses, occupational therapists (OTs), and physical therapists (PTs). DPSCD ratios are compared to other urban school districts on which we have data.[85] (All districts did not report data in each area.) These data are based on full time equivalent (FTE) staff members and not on the number of positions *per se*. Also, the Council team presumes that FTE data included vacant positions.

The data do not give precise comparisons, so results need to be used with caution. District data are not consistently reported (e.g., some districts include contractual personnel and others

[85] Much of the data were provided by the school districts that responded to a survey conducted by the Urban Special Education Leadership Collaborative; the Council team or members of the team collected the remaining data during district reviews.

exclude them) and data are sometimes affected by varying placement types used by school districts. The data may count all students with IEPs, including those placed in charters, agencies, and nonpublic schools, while other districts do not count these students. Still, these data are the best available and are useful as a *rough guide* to staffing ratios. Appendix A has detailed data on each school district.

Special Educators

The following are data on special education teacher ratios and other information provided by the district along with focus group feedback.

Special Education Teacher Staffing Ratios

Exhibit 4a shows the district's student-to-special-education teacher ratios, compared to 75 other urban school districts. With 535.8 full-time-equivalent (FTE) special educators, DPSCD has an average of 16 students with IEPs (including those with speech/language impairments) for every special educator.[86] This ratio is higher than the 14.4 teacher-student average among all districts on which we have data and ranks DPSCD as 50th among 75 reporting districts. In other words, DPSCD has fewer such staff than the other districts.

Exhibit 4a. Average Number Students for Each Special Educator

Areas of Comparison	Special Education Teachers
Number of DPSCD Staff FTE	535.8
DPSCD Student w/IEP-to-Staff Ratios	16:1
All District Average Ratios	14.4:1
Range of All District Ratios	7–37:1
DPSCD Ranking Among Districts[87]	**50th of 75 districts**

Vacant Special Education Teacher Positions

Special education teacher shortages have been an historic issue in the district. According to district representatives, there were 37 positions being filled by long-term substitutes, 6 by TCs, and 1 by a behavioral specialist. Another 11 positions were vacant. These shortages were a common concern among focus group participants.

Allocation of Positions and Hiring

The following information was provided by the district on how special educator positions were filled, allocated to schools, and supervised.

- ***Allocation.*** To determine the number of special education teachers each school requires, the district reviews the previous school year's special education enrollment, and staffing is

[86] Although special educators for the most part do not instruct students with a speech/language impairment only, as SLPs are the primary providers, these students were included as students with IEPs among all surveyed districts.
[87] Ranking begins with districts having a low average number of students to one staff person.

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determined by various special education qualifiers.

- ***Hiring/Supervision.*** In the past, the special education department made hiring decisions for special educators meeting state criteria. School principals are making these decisions now. School-based special education teachers are supervised by principals and special education supervisors may provide input.

Paraeducators

The following is information about paraeducator[88] ratios and feedback from focus group participants.

Paraeducators Staffing Ratios

Exhibit 4b shows the district's student-to-paraeducator ratios, compared to 75 other urban school districts. With 458 FTE paraeducators, DPSCD has an average of 19 students with IEPs for every paraeducator.[89] This ratio is higher than the 15.7 paraeducator-student average among all districts on which we have data and ranks DPSCD as 60th among 75 reporting districts. In other words, DPSCD has fewer such staff than other districts.

Exhibit 4b. Average Number Students for Each Paraeducator

Areas of Comparison	Paraeducators
Number of DPSCD Staff FTE	458
DPSCD IEPs-to-Staff Ratios	19:1
All District Average Ratios	15.7:1
Range of All District Ratios	4.3–56:1
DPSCD Ranking Among Districts[90]	**60th of 75 districts**

Paraeducator Vacancies

When the team made its site visit, DPSCD had 30 vacant paraeducator positions, including six in one school. Some vacancies were due to program growth.

Allocation of Positions, Hiring, and Supervision

The district provided the following on how paraprofessional positions were filled, allocated to schools, and supervised.

- ***Allocation.*** Paraprofessionals are allocated to schools based on state criteria and IEP decisions on individual students. An evaluation of student need includes standardized tests, parent input, classroom observations, teacher input, and student classwork.
- **Hiring/Supervision.** Paraprofessionals meeting established criteria are hired by the district. In the future, principals will make hiring decisions on paraprofessionals. The school principal is responsible for monitoring paraprofessionals' work performance.

[88] The term paraeducator is used generically.
[89] Although special educators for the most part do not instruct students with a speech/language impairment only, as SLPs are the primary providers, these students were included as students with IEPs among all surveyed districts.
[90] Ranking begins with districts having a low average number of students to one staff person.

Related Services

Staffing ratios for related-services personnel are summarized below and shown in Exhibit 4c.

- ***Psychologists.*** With 40 FTE psychologists, there was one psychologist for every 218 students with IEPs, compared to the district average of 178 students. DPSCD ranked 51st of 67 reporting districts in its number of psychologists. Some 4 FTE contractual personnel are filling psychologist positions. According to district staff, there was a desire to hire 21 more psychologists.
- ***Speech/Language Pathologist (SLP).*** With 98 FTE speech/language pathologists (SLPs), there was one SLP for every 89 students with IEPs in DPSCD, compared with the district average of 127:1 students. DPSCD ranked 31st of 73 districts reporting SLP data. Some 53.5 FTE contractual personnel are filling SPL positions.
- ***Social Workers.*** With 76 FTE social workers, there was one social worker for every 115 students with IEPs in DPSCD, compared with the district average of 295:1 students. DPSCD ranked 18th of 47 districts reporting social worker data.[91] Some 12 FTE contractual personnel are filling social work positions. According to district representatives, there was a desire to hire 117 social workers, including those funded under Title 1.
- ***Nurses.*** With 38 FTE nurses, there was one nurse for every 230 students with IEPs in DPSCD, compared with the district average of 163:1 students. DPSCD ranked 51st of 60 districts reporting data on nurses.[92] Some 38 FTE contractual personnel (including 18 dedicated for students with IEPs) were filling nursing positions.
- ***OTs.*** With 31.6 FTE occupational therapists (OTs), there was one OT for every 276 students with IEPs in DPSCD, compared with the district average of 353:1 students. DPSCD ranked 29st of 71 districts reporting OT data. Some 22 FTE contractual personnel are filling OT positions.
- ***PTs.*** With 10 FTE occupational therapists (PTs), there was one PT for every 873 students with IEPs in DPSCD, compared with the district average of 997 students. DPSCD ranked 38th of 71 districts reporting OT data. Some 7 FTE contractual personnel are filling PT positions.

Exhibit 4c. Average Number Students for Each Speech/Language Pathologist and Psychologist

Related-Services Areas	Psychologists	SLPs	Social Worker	Nurses	OT	PT
Number of DPSCD Staff FTE	40	98	76	38	31.6	10
DPSCD Students w/IEPs-to-Staff	218:1	89:1	115:1	230:1	276:1	873:1
All District Average Ratio	178:1	127:1	295:1	163:1	353:1	997:1
Range of All District Ratios	26–596:1	31–396:1	26-705:1	58-834:1	64-1685:1	128-2941:1

[91] There are 85.5 FTE social workers dedicated to students with IEPs. All figures reflect total numbers of social workers regardless of whether they have restrictions on service.
[92] There are15 FTE nurses dedicated to students with IEPs.

Related-Services Areas	Psychologists	SLPs	Social Worker	Nurses	OT	PT
DPSCD Ranking	51st of 67	31st of 73	18th of 47	51st of 60	29th of 71	38th of 71

Allocation of Positions, Hiring, and Supervision

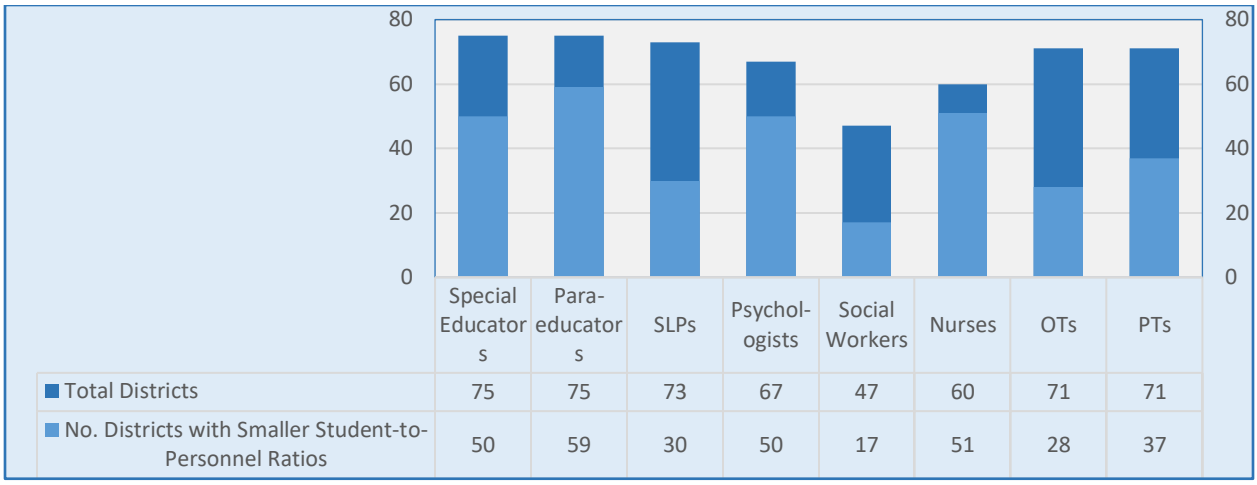
For service providers with maximum caseload limits, staffing is typically calculated at 80 percent of the cap with consideration given to service time required for students on each caseload. Additionally, the type of service provided (e.g., small group or individual) to students is taken into account. For school psychologists, administrators consider school needs, like initial evaluation numbers, active RCT processes, and use of psychologists for interventions. Unlike other districts in which principals supervise and evaluate related services personnel at their schools, special education supervisors perform this function in DCPSD.

Overall School District Rankings

Exhibit 4d shows DPSCD's rankings compared to other responding districts in each of the personnel areas. These figures must be viewed with caution and should not be used to make personnel decisions.

- ***Special Educators.*** Of 75 responding districts, 50 districts (67 percent) had smaller student-to-personnel ratios.
- ***Paraprofessionals.*** Of 75 responding districts, 59 (79 percent) had smaller student-to-personnel ratios.
- ***Speech/Language Pathologists.*** Of 73 responding districts, 30 (41 percent) had smaller student-to-personnel ratios.
- ***Psychologists.*** Of 67 responding districts, 50 (75 percent) had smaller student-to-personnel ratios.
- ***Social Workers.*** Of 47 responding districts, 17 (36 percent) had smaller student-to-personnel ratios.
- ***Nurses.*** Of 60 responding districts, 51 (85 percent) had smaller student-to-personnel ratios.
- ***OTs.*** Of 71 responding districts, 28 (39 percent) had smaller student-to-personnel ratios.
- ***PTs.*** Of 71 responding districts, 37 (52 percent) had smaller student-to-personnel ratios.

Exhibit 4d. DPSCD Ranking and Number of District Survey Respondents



	Special Educators	Para-educators	SLPs	Psychol-ogists	Social Workers	Nurses	OTs	PTs
Total Districts	75	75	73	67	47	60	71	71
No. Districts with Smaller Student-to-Personnel Ratios	50	59	30	50	17	51	28	37

Personnel Shortages

According to district staff, DPCSD has severe shortages of personnel in the areas of special educators, paraprofessionals, nurses and psychologists. The shortages are affecting service delivery, referrals, and timely evaluations. Furthermore, in some circumstances staff members are filling positions for which they are not qualified. Although the number of vacancies has declined since September 2017, there remained seven special education department staff members who were not carrying out their required responsibilities because they were acting as substitutes in classrooms without an assigned special educator. According to focus group participants, even when principals could identify personnel to fill a vacant position, the hiring process did not take place in a reasonable period. As a result, potential hires were lost to other districts.

Focus Group Feedback About Shortages

The following concerns were raised by focus group participants about personnel shortages.

- ***Psychologists.*** A relatively large number of psychologists are leaving DPSCD to retire or work for other districts. Four schools had no assigned psychologist. This was impacting the RCT process and students whose parents who may otherwise have been asked to consent to an evaluation.
- ***Speech Language Pathologists.*** These personnel have a large turnover rate, and maintaining current personnel is challenging because DPSCD's salary and benefits structure is lower than surrounding districts.
- ***Nurses.*** Reportedly, some schools were noncompliant with state requirements because two people had not been trained to use EPI pens.
- ***Contractual Personnel.*** The district relies on numerous contractual staff due in part to difficulty recruiting and hiring potential employees. Private agencies on which the district relies to supplement nursing services are also having difficulty recruiting nurses. Several principals of charter schools shared with the team that they use agencies successfully to fill their special education staffing needs.

Recruitment & Incentives

Interviewees described several recruitment activities and incentives that the district was discussing to reduce personnel shortages in special education, including--

- ***Recruitment Plan.*** A plan has been presented to the board of education to address recruitment beyond Michigan, with a focus on special education.
- ***Hiring Events.*** Active recruitment from universities is ongoing with 38 events scheduled at colleges and universities, including Gallaudet University, which educates college students who are deaf and have hearing impairments.
- ***Incentives.*** Incentives are under review or have been initiated, including--
  - Salary incentives, bonuses, salary schedule advancements, etc.;
  - Support to paraprofessionals and general educators to continue their education and become certified in special education; and
  - City of Detroit initiative for city employees, including school personnel, to receive loans to rehabilitate newly purchased homes.
  - The district is exploring recruitment incentives for external partners.

Compliance Issues

There is inconsistent knowledge and understanding among staff of special education requirements and procedures mandated under state and federal special education laws. The result, along with inconsistent implementation issues, can mean compliance problems for the district. Other issues that affect compliance are reliable data; an effective IEP system; training; and implementation difficulties stemming from staff shortages.

Written Guidance

DPSCF's written guidance materials on the management and operation of special education and Section 504 of the Rehabilitation Act are described below.

Special Education

The district's 2011 special education operating procedures manual was updated in 2017. The manual is currently being reviewed for accuracy and timeliness. Although the team was told that the manual was on-line, it was not updated on the special education department webpage or readily available to stakeholders. The manual is in pdf format and does not contain links to additional information or other publicly available resources. It is our understanding that new procedures are currently being written.

Section 504

DCPSD has a policy on Section 504 that addresses all areas of the law, such as employment and students. These policies are posted on the district's website. Reportedly, the district has a Section 504 manual. District attorneys are working with staff members from the U.S. Department

of Education's Office for Civil Rights (OCR), which monitors Section 504 (a well as the Americans with Disabilities Act) to develop a comprehensive document.

Focus group participants reported that Section 504 was not well coordinated at the school level in DCPSD, and there was little knowledge about its requirements because of the lack of training. There was also concern about the low number (36) of students having a Section 504 plan. The following are promising activities that staff described to the team for better coordination and implementation: leadership of DPSCD's attorney who has been involved with this initiative since December 2017; training available from Wayne RESA; and district training being planned for school staff.

Due Process

Law department attorneys meet with the senior executive director and relevant staff members twice each month to discuss due process filings and OCR complaints. The number of filings for due process hearings remained constant between 2015-16 and 2016-17, with six to seven cases filed each year. As of the team's site visit, only one matter (later withdrawn) had been filed.

State Complaints

The number of complaints filed with MDE against the district held constant from 2015-16 to 2016-17 (34 and 35, respectively). Some 18 complaints had been filed during the current school year (as of the team's January 2018 visit). At that point, there were 13 complaints still active. Most complaints involved the timeliness of evaluations, the timeliness of annual IEPs, child find obligations, IEPs individualized to meet students' unique needs, IEP implementation, and placement decisions.

The consultant who is assisting the senior executive director is working to resolve the district's outstanding complaints. Once under control, she will help address issues that most frequently trigger complaints, such as training for principals and other school personnel on procedural safeguards required for school removals, prior written notice, IEP implementation, and other issues.

Overdue IEPs

A major compliance issue facing the district involves the timeliness of IEP meetings. One reason for delays has been personnel shortages. There is little guidance for principals on how to develop IEPs and hold meetings when a certified special education teacher is not available. The special education department's IEP compliance specialists asked to complete IEPs sometimes lack appropriate space to conduct meetings or paperwork necessary to support the process.

Historically, DCPSD's IEPs are completed in the spring and by the October child count rather than throughout the school year, which is typical in most other school districts. Another issue is that IEP specialists have been informed that they cannot send out group emails to principals, so more time is required to collect or provide information one-to-one. Furthermore, principals do not consistently follow up on requested information in a timely manner.

IEP System

Focus group participants voiced numerous concerns about the district's IEP system.

- ***User-friendly Reports for Schools.*** The system does not produce user-friendly reports, which are color-coded to support compliance, and that are simple to read and search to address issues in a proactive manner. School personnel must rely instead on special education department personnel to submit reports to schools, rather than enabling them to have a menu of real-time reports they could easily access. Other school districts with which we are familiar use such easy-to-access IEP systems and reports.
- ***Data Analysis.*** The special education department relied on Wayne RESA to issue various data reports for the Council's team. These reports were reports that other school districts have been able to produce independently. The data in them were of a type that the special education department should be able to routinely run on its own and drive district decision-making.
- ***IEP System Effectiveness.*** There was a belief among interviewees that the current IEP system no longer meets DPSCD's needs, e.g. enabling teacher names and caseloads to be entered to facilitate real-time monitoring.
- ***Notice of IEP System Changes & Training.*** IEP form changes may occur mid-year but there is no advanced notice about changes unless one attends a meeting or workshop, e.g., elimination of dropdown menus. In addition, more training on the IEP system is needed because of school-based staffing changes.

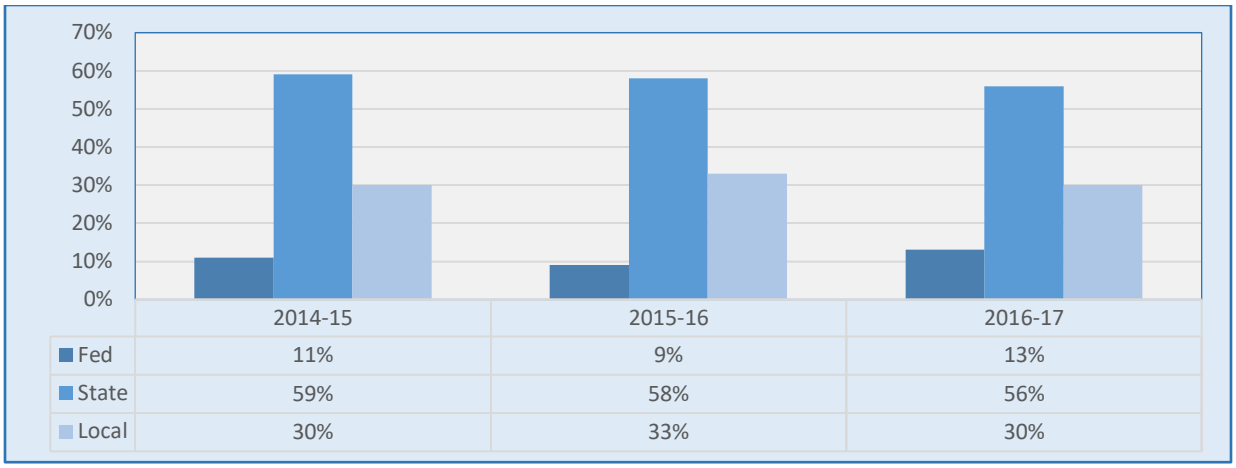
Fiscal Issues

DPSCD spends a relatively large percentage of its local funds to support special education, and charter schools can fund special education at a much higher level than the district because of differences in student need. This information is explained in more detail below.

Proportional Funding Sources

Data in exhibit 4d show the percentages of district revenue in 2014-15 through 2016-17 that was directed to special education from state, federal and local sources. While the percentage of federal revenue (IDEA and Medicaid) increased from 11 percent to 13 percent of the district's budget (some $2+ million) over this period, the percentage of state funding decreased from 59 percent to 56 percent (some $8 million). Local funding remained at about 30 percent of the budget, even with a net decrease of some $5 million. These figures may have changed in 2017-18 with the establishment of DPSCD. In the experience of the Council team, the district's 30 percent local share is disproportionately high compared to other urban school districts.

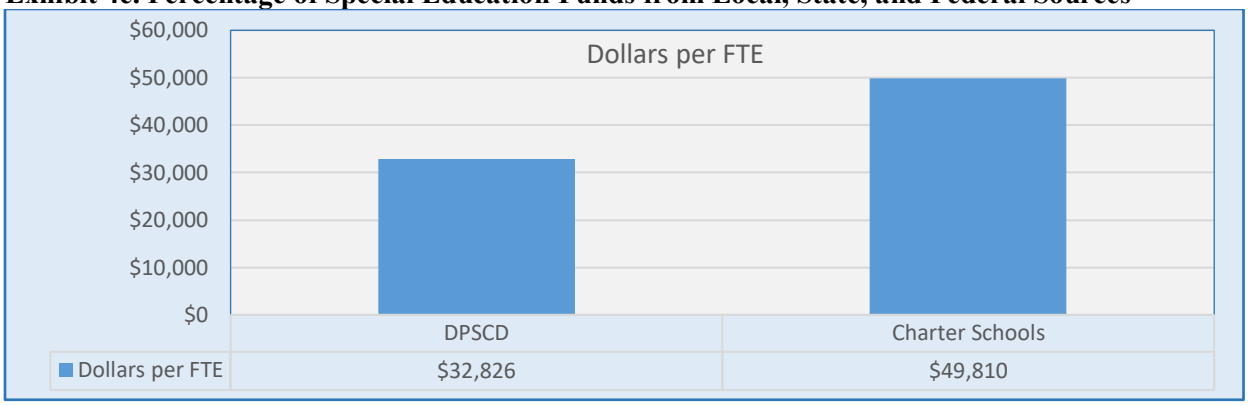
Exhibit 4d. Percentage of Special Education Funds from Local, State, and Federal Sources



Comparison of DPSCD and Charter Schools for Total Per Pupil Special Education Costs

Dollar costs for special education per FTE are shown in exhibit 4e. District staff reported to the Council team that despite having a smaller percentage of resource-intensive pupils and a larger percentage of resource-light pupils, charter schools incurred 52 percent more in total costs per pupil on an FTE basis than DPSCD. This discrepancy helps explain why DPSCD would have to allocate a higher proportion of its general education funds towards special education.

Exhibit 4e. Percentage of Special Education Funds from Local, State, and Federal Sources[93]



MDE directly funds DPSCD charters based on FTE students with IEPs, in addition to providing federal aid. As previously shown in exhibits 2e and 2f, charter schools enroll higher percentages of students with lower-cost disabilities such as specific learning disabilities and speech/ language impairment compared to DPSCD, and lower percentages of students requiring more intensive supports, such as autism spectrum disorder, cognitive impairment, and emotional impairment.

Focus group participants voiced concerns that a disproportionate number of students who returned to DCPSD from charter schools had IEPs, and that those IEPs had fewer than expected

[93] Data from school State Aid Reports, April 2017

services. Documenting these occurrences are steps that the district's board of education may want to take as they renew or terminate DPSCD-authorized charter schools.

Focus Group Participant Feedback on Fiscal Issues

Various fiscal issues were also brought up by interviewees. These included--

- ***Special Center Budgets.*** Although Wayne RESA provides funds for their Act 18 special centers in the spring, the district's slow processes prevent the centers from implementing budgeted activities, e.g., hiring and purchasing, until late the following school year – if at all. This may explain the substantial amount of funds that must be returned to Wayne RESA because they were not used as intended.
- ***Vendor System.*** In the past, it was reported that when compensatory services required the use of an outside evaluator, it has taken six months to a year for the evaluator to obtain a vender number.
- ***Transportation.*** Special education pupil transportation costs in FY 2018 was budgeted at $199,669. This cost included 40 percent of students with IEPs--or 3,398 students—with door-to-door services. This high rate is based on several factors, including the uneven placement of specialized programs. These placements generally depend on schools having the space and willingness to host the program. Also, the district does not have a protocol or decision tree to guide its IEP transportation decisions on whether a student requires door-to-door service.
- ***Medicaid Revenue.*** DPSCD receives close to $6 million in Medicaid revenue for services the district provides for Medicaid-eligible students. Currently, the district does not track service delivery electronically and relies on paper documentation and submissions. Based on experience in other school districts, potential reimbursements are likely being lost because of the paper-based process that the district is using.

Accountability

In the fall of 2011, the Council of the Great City Schools published its report Pieces of the Puzzle: Factors in the Improvement of Urban School Districts *on the* National Assessment of Educational Progress.[94] The report summarized research the Council conducted with the American Institutes for Research (AIR) on characteristics of urban school districts that made the greatest academic improvements and had the highest overall performance on the National Assessment of Educational Progress (NAEP). The first characteristic involved a district's clear statement of goals and districtwide accountability for results. These factors help create a culture of shared responsibility for student achievement.

Other research has found similar results and has clarified barriers to effective teaching and learning.[95] School districts that effectively support school leadership often demonstrate the ability

[94] Available at http://www.cgcs.org/cms/lib/DC00001581/Centricity/Domain/4/Pieces%20of%20the%20Puzzle_FullReport.pdf

[95] Toward a School District Infrastructure that More Effectively Addresses Barriers to Learning and Teaching, A Center Policy & Practice Brief, Center for Mental Health in Schools at UCLA. November 2011, at http://smhp.psych.ucla.edu/pdfdocs/briefs/toward%20a%20school%20district%20infrastructure.pdf.

to facilitate learning, address barriers, and govern and manage the district in ways that prioritize good instruction. In pursuing these goals, districts showing improvement have mechanisms for systemic planning, program implementation, evaluation, and accountability.

District staff provided several ways in which DPSCD is bolstering accountability for student achievement.

- DPSCD's research and assessment office has developed a data collection system, which has enabled the district to publish data consistent with annual education report requirements.
- The frequent monitoring of the implementation of the district's strategic plan will be conducted through school diagnostic visits, review of benchmark assessments, use of a teacher evaluation tool, and adherence to the pacing calendar.
- Schools are developing goals to strategically monitor student performance on the M-Step, NWEA, and iReady.
- The district is developing new metrics to track student growth and student proficiency benchmarks and skills.
- Students are given report cards and progress reports quarterly to demonstrate academic progress on each specific content area as aligned to MDE graduation requirements.

Focus Group Participant Feedback

Focus group participants provided several comments around accountability.

- ***Strategic Plan.*** As the district monitors implementation of the strategic plan, indicators need to be developed specifically for students with IEPs. These indicators should take into account evidence-based practices to drive systemic and school-based improvements.
- ***Student Growth.*** Metrics to track student growth and proficiency should address the varied circumstances of students with disabilities.
- ***Protocol for Required Activities.*** There is no protocol or procedure in place to resolve differences when special education department personnel provide guidance to schools on compliance or performance and there is either disagreement or lack of follow-up.

AREAS OF STRENGTH

The following are areas of strength in the district's support for teaching and learning for students with disabilities.

Interdepartmental Communication and Collaboration

- ***Collaborative Relationships.*** The deputy and senior executive director for curriculum and instruction have a strong working relationship. There is also strong collaboration between special education department personnel and representatives from other departments.

Special Education Department Operation

- ***Consultant Support.*** Although delayed from the beginning of the school year, a highly respected consultant has been hired to support the special education department.
- ***Wayne RESA.*** Wayne RESA staff are communicating regularly with the senior executive director for special education and her staff about various issues of concern
- ***Special Education Staff.*** The district's special education department has hard working and dedicated staff.

School-based Support for Special Education Management and Operation

- ***Students Outside of DPSCD.*** DPSCD has opened its doors to students with IEPs from other districts to receive special education services.
- ***Principal Leadership.*** Generally, principals welcome the opportunity to receive information on program compliance and improve their ability to carry out their roles and responsibilities. Principals participate in school walkthroughs that include special education classes.
- ***Hiring Decisions.*** School principals are making hiring decisions for special educators, and they will be making hiring decisions in the future for paraprofessionals.
- ***Recruitment and Incentive.*** Various recruitment activities and incentives are being discussed to reduce personnel shortages in special education, e.g., improved salary and benefit schedules, support for continuing education, home loan arrangements, etc.

Compliance Support

- ***Written Operating Procedures.*** The 2011 special education operating procedures manual was updated in 2017 and is being reviewed for accuracy and timeliness. District attorneys are working with the federal Office for Civil Rights to develop a comprehensive Section 504 document. With training being planned for school staff, there appears to be a foundation for improving Section 504 activities in the future.
- ***Oversight of Due Process and OCR Complaints.*** Law department attorneys meet with the senior executive director and relevant staff members twice each month to coordinate due process filings and OCR complaints. Relatively few requests for due process are filed by parents for a district this size.
- ***MDE Complaints.*** The district's special education consultant is helping to resolve outstanding complaints and is planning to address the most frequent triggering issues, such as training for principals and other issues related to procedural safeguards, school removals, prior written notice, IEP implementation, etc.

Fiscal Issues

- ***Medicaid Revenue.*** DPSCD receives close to $6 million in Medicaid revenue for services it provides to Medicaid-eligible students.

Accountability

- ***Initiatives.*** DPSCD is moving to bolster its accountability for student achievement by publishing data consistent with annual education report requirements; monitoring the district's strategic plan implementation; having school-based goals to strategically gauge

student performance; developing metrics to track student growth and proficiency on specified benchmarks and skills; and using quarterly report cards and progress reports on content aligned to MDE graduation requirements.

OPPORTUNITIES FOR IMPROVEMENT

The following areas provide opportunities for improvement for students with disabilities.

- ***Regular Communication.*** Regularly scheduled communications are not always occurring between curriculum/instruction personnel and the deputy's academic-related leaders. As a result, information is not being sufficiently shared with respect to upcoming plans.
- ***Special Education Director Involvement.*** The senior executive director (director) for special education does not participate in cabinet meetings. In her absence, the deputy superintendent (deputy) represents special education. The deputy also represents other areas under her supervision, and issues involving special education have been challenging, are persistent, have significant impact on schools and students, and are costly—and need special attention.
- ***Cohort Principals and Leaders.*** Cohort principal leaders and principals meet as a group with the deputy superintendent. During these meetings, the deputy also represents special education. Except for the cohort-five principal leader who directly reports to another deputy, the leaders have not been authorized explicitly to meet with their respective principals to address issues in their schools.
- ***Special Education Liaisons.*** Although a special education liaison is assigned to each of the cohorts, they have not had an opportunity to establish an ongoing working relationship with their respective principal leaders.

Administration and Operation of Special Education

- ***Authority of Senior Executive Director.*** There is a widespread belief among staff that the deputy superintendent of schools has taken on the leadership role for special education, and, as a result, the executive director lacks the authority to direct, supervise, and make necessary decisions in the department. This has led some to perceive the senior executive director has not moved quickly enough to resolve some issues or answer questions.
- ***Internal Department Meetings.*** The special education leadership team meets with the senior executive director on a weekly basis, but at the time of our visit the special education department had not yet met as a group.
- ***Overall Special Education Organization.*** The special education department is organized around seven units: five for the cohorts, one for compliance, and one for ancillary personnel. On paper, there are 22 supervisors, including five vacant positions, and 3 directors that report directly to the senior executive director. The organizational structure is unwieldly.
- ***Special Education Liaisons to Cohorts.*** The team anticipated that a special education liaison in each cohort would support schools aligned to each principal leader. This arrangement, however, has not been realized because cohort personnel continue to have program supervisory responsibility in addition to numerous schools they are assigned to. The liaisons' small bandwidth and large span of responsibilities makes the current structure untenable, and the organization configuration is not reasonably calculated to provide maximum support to

schools.

- ***Reorganization.*** The 2017-18 school year began with 19 of 22 new supervisors. There is clearly a need for immediate attention to the department's organization, but these expedited changes raised concerns among school personnel, parents, and other stakeholders. Along with personnel cuts, special education department personnel were given very short notice to report to schools to cover classes without certified teachers. It was unclear how long these teachers will continue this deployment. The reorganization of the special education department has become complicated by administrator seniority rights. The result has been some positions being filled by personnel without the knowledge and background necessary to be effective.
- ***Wayne RESA Recommendations.*** During meetings with the deputy superintendent and senior executive director, Wayne RESA made several thoughtful recommendations involving including the senior executive director in cabinet meetings; assigning supervisors and staff with proper credentials and approvals; clarifying the role of Act 18 supervisors and building principals; developing a communication plan that was comprehensive and seamless; and ensuring supervisors consistently attend Wayne RESA Coordinating Council/Region meetings. The Council team agreed with these suggestions.

School-based Support for Special Education Management and Operation: Central Office

- ***Principal Leadership.*** Principal leadership varies by school. Some principals actively oversee special education and interact with parents on the program, and others are not as engaged. It was also clear that all principals have not received the training they need to be effective and accountable. Unlike other districts having principals supervising and evaluating related-services personnel at their schools, DPSCD special education supervisors perform this function.
- ***School Walk Throughs.*** Principals need more explicit classroom observations protocols on special education.
- ***Lead Teachers.*** Not every school has a lead teacher acting as a liaison between the school and special education department personnel. The absence of a stipend or reduced caseload makes it difficult for some principals to find a special educator willing to carry on the lead teacher role. Issues that affect the effectiveness of lead teachers include: who to call with specific problems; coordination with different program supervisors; lack of protocols for roles and responsibilities; and mandatory and differentiated training.
- ***Case Management.*** It is difficult for special educators to carry out their case management responsibilities because of competing priorities (e.g., teaching). Also, prep time is sometimes too short to complete meetings, and securing required participant attendance at meetings is sometimes difficult.

Special Education Related Staffing Ratios and Information

- ***Personnel Ratios.*** Some staffing ratios are much higher than most other respondent school districts; others are much lower. The personnel ratios, on their own, do not support personnel decisions or changes, although many of the findings support the district's own analysis of personnel configurations.
- ***Personnel Shortages.*** There are substantial shortages of personnel in the areas of special

educators, paraprofessionals, psychologists, and nurses. These shortages affect instruction, service delivery, timely evaluations, and compliance. Also, numerous positions are being filled by contractual staff, and current special education personnel are leaving for other districts because of salary and benefits. When principals identify personnel to hire for vacant positions, delays in the employment process has sometimes resulted in potential hires taking positions in other districts.

Compliance Issues

There is inconsistent knowledge and understanding of the requirements and procedures in state and federal special education laws, which may be leading to both compliance and implementation problems. Specifically, there is a lack of data availability, an effective IEP system and IEP development processes, and inadequate training. Some of this is also due to staff shortages. The following are additional compliance issues.

- ***Special Education Procedures.*** The special education operating manual is not readily available to all stakeholders on the special education department webpage. Using a pdf format, the current manual does not allow for links to more information or publicly available resources.
- ***Section 504 Operations.*** Section 504 is not well coordinated at the school level, and there is little knowledge about its requirements. Only 36 students in the district are reported to have a Section 504 plan.
- ***MDE Complaints.*** Over the last two years, some 35 complaints against the district were filed with MDE. Common complaints include issues of the timeliness of evaluations and annual IEPs, child find obligations, developing and implementing IEPs, and placement decisions. District personnel are acting to resolve complaints to avoid corrective action.
- ***Timely IEP Meetings.*** Holding timely IEP meetings is a compliance issue in the district. Various reasons were given for delays, including problems with the scheduling of meetings during the spring and fall rather than throughout the school year. Also, delays were attributed to special education teacher shortages and the lack of written guidance to principals about how to conduct IEP meetings when a certified special education teacher was unavailable. IEP compliance specialists who are asked to help schools with IEP development have sometimes found no appropriate space to conduct meetings or paperwork to support the process. IEP consultants have been informed they cannot send out group emails to principals, so communication is more time consuming.

Fiscal Issues

- ***Local Support for Special Education.*** DPSCD spends a relatively large 30 percent of its local funds to support special education.
- ***Charter School Support for Special Education.*** Despite having a smaller percentage of resource-intensive students (e.g., severe multiple impairment) and a larger percentage of resource-light pupils, (e.g., severe multiple impairments), charter schools have 52 percent more to spend per pupil than DPSCD. Reportedly, a number of students who return to DCPSD from charter schools have IEPs, and their IEPs have fewer than expected services. Documentation of these situations are things the board of education may want to consider as

they renew or terminate DPSCD-authorized charter schools.

- ***Center School Budgets.*** Although Wayne RESA provides center schools with their Act 18-funded budgets in the spring, the district's slow processes prevent personnel from spending their funds in a timely manner. Activities like hiring personnel and purchasing material may not occur until late in the following school year – if at all.
- ***Vendor System.*** Historically, when compensatory services require the use of an outside evaluator, it has taken six months to a year for some to obtain a vender number.
- ***Transportation.*** High costs apply to 40 percent of students with IEPs who are transported, including those who are provided door-to-door transportation. Factors that contribute to these costs include the uneven placement of specialized programs because of space considerations and principal willingness to host programs; the absence of protocols for placing programs or to guide IEP transportation decisions.
- ***Medicaid Reimbursement.*** District personnel do not track their service delivery electronically, relying instead on paper submissions. Potential Medicaid reimbursements may be lost because it is more difficult to document, submit, and monitor paper-based services.

Accountability

- ***Strategic Plan.*** As the district monitors implementation of its strategic plan, indicators need to be developed on students with IEPs. These indicators should take into consideration evidence-based practices that would drive systemic and school-based improvements.
- ***Student Growth*** Metrics to track student growth and proficiency need to include students with IEPs, taking into account their unique circumstances.
- ***Protocol for Required Activities.*** There is no protocol in place to help resolve differences or require action when special education department personnel provide compliance or programmatic guidance to schools and there is either disagreement or lack of follow-up. Furthermore, there is little if any school-based accountability for compliance. Such circumstances include following procedures for out-of-school suspensions; entering timely transportation data; holding timely IEP meetings; exiting students from school to facilitate a transfer or initiate a transportation route; and implementing IEPs as written.
- ***Data Collection and Reporting.*** Various issues cited throughout this report relate to problems with reporting student data accurately. These include providing data in a user-friendly and easy-to-access manner. Specific issues include--
  - ***Early Childhood SPP Indicators.*** The district's report showed no students entered early childhood below expectations and had substantially improved developmentally upon exiting. In addition, reports showed identical rates for children meeting age expectations by the time they exited the program. Both areas related to appropriate behavior, acquisition and use of knowledge and skills, and positive social/emotional skills.
  - ***Data Reports.*** The special education department had to rely on Wayne RESA to provide various reports for the Council's special education review team. For example, one report involved students from other districts attending DPSCD schools. In general, these reports that Wayne RESA had to provide were typical of reports that other school districts can produce on their own. Moreover, the special education department should be able to

prepare these reports to analyze district services and drive decision-making. Also, reports produced by the district for the Council team were not easy to analyze and required extensive manipulation.

- ***IEP System.*** The IEP system no longer meets district needs. For example, it does not allow the district to track special education teacher caseloads; provide notices to school personnel when the IEP system is modified; and code Turning Point as a special school attended solely by students with IEPs. Continual training is necessary for the constant influx of new staff.

RECOMMENDATIONS

The following recommendations are offered to improve supports for teaching and learning for students with disabilities.

5. ***Department, Cohort, and Special Education Support for Schools.*** Specifically charge senior staff in all central office departments with collaborating with each other to support teaching and learning for students with disabilities. In addition--

   a. ***Superintendent's Cabinet.*** Include the special education senior executive director in cabinet meetings to ensure the director receives direct information about district initiatives and can contribute to discussions.

   b. ***Collaborative/Inclusive Discussions and Deliverables.*** Ensure all central office, cohort, and school discussions affecting teaching and learning include special education personnel and others knowledgeable about students with disabilities. Have department representatives from special education and English language learners meet regularly to address mutual responsibilities for English learners who have disabilities, and charge staff with developing and implementing models of effective instruction and supports for English learners with IEPs. (Coordinate with Recommendation 4b.)

   As part of this collaboration, identify personnel in other departments having interactions with schools who can be aligned to one or more cohorts to build the capacity of principal leaders and principals to support their schools.

   b. ***Principal Leaders.*** Expect principal leaders and their respective special education cohort leaders (see Recommendation 6a below) to meet at least biweekly to –

   - ***Review School Data*** on issues delineated in this report and other areas relevant to teaching and learning.
   - ***Strategic Planning.*** Develop strategic actions based on data with principals having common issues and individual principals having unique issues.
   - ***Professional Learning.*** Develop professional learning for cohort personnel based on Recommendation 4d and other areas of need.
   - ***Monitoring.*** Establish monitoring protocols for cohorts based on Recommendation 4f.

   c. ***Cross-Functional Training.*** Establish a structure for cross-training of personnel from different departments to provide essential information for all principals, leadership teams, and teachers. More personnel should be available to support schools and teachers. In

addition, use personnel with specialized expertise beyond what most teachers are expected to know.

6. ***Special Education Department Organization.*** The following recommendations are designed to enable special education department personnel to more effectively assist principal leaders, and school personnel to support teaching and learning. The senior executive director should be able to carry out her roles and responsibilities and should have the authority to do so. This includes the ability to make day-to-day decisions on activities within her control. To facilitate relationships between the senior executive director, principal leaders, and principals, she needs to attend principal meetings and have a standing agenda item at those meetings.

   a. ***Special Education Department Organization and Support for Schools.*** This recommendation is meant to create a more streamlined and cohesive special education organizational structure. It also includes components on major areas of work.[96] The recommendation is based on the department's having eight leaders, including five supporting cohorts, reporting directly to the senior executive director. These leaders, along with the senior executive director, would constitute the core strategic planning and high level problem-solving team for the department. (See exhibit 4f for a graphic illustration for this recommended organization.)

   - ***Direct Report to Senior Executive Director.*** Have the following positions report directly to the special education director:
     - Expert leader
     - Five cohort leaders[97]
     - Related services leader
   - ***Expert Unit.*** Currently, 16 supervisors[98] are assigned to five cohorts in varying numbers and each has specialized programs they oversee, e.g., ASD, EI, SCI/SXI, etc. Under the supervision of one expert leader identify the expertise necessary for personnel to support cohort leaders and personnel under their supervision. Collectively, expert unit personnel should have the knowledge, experience, and skills to:
     - Accelerate literacy for struggling readers, including those with dyslexia;
     - Accelerate math achievement;
     - Improve instruction aligned with alternate assessments and standards;
     - Improve positive behavior for students with the most challenging social/emotional and behavioral needs;
     - Improve postsecondary transition activities and supports, including community-based training

[96] Some activities, such as responsibility for nonpublic school placements, are judgmental in terms of organizational placement and are not specifically addressed. These activities should be embedded in the appropriate unit as the organization is developed.
[97] Generic terms are used to provide DPSCD with the flexibility to determine the appropriate administrative level(s) for each position.
[98] Based on the December 6, 2017 organizational chart provided to the Council team. Several of these positions are vacant.

These individuals would not supervise "programs" per se. Instead, they would gather the most current evidence- and research-based information; provide leadership on the development of standards of practice and monitoring guidance; provide professional development to other units and schools; and support cohort personnel when they need additional expertise to address issues at schools. In addition to obtaining feedback from cohort and auxiliary personnel, the experts should visit schools periodically to observe and obtain a better understanding of teaching/learning challenges.

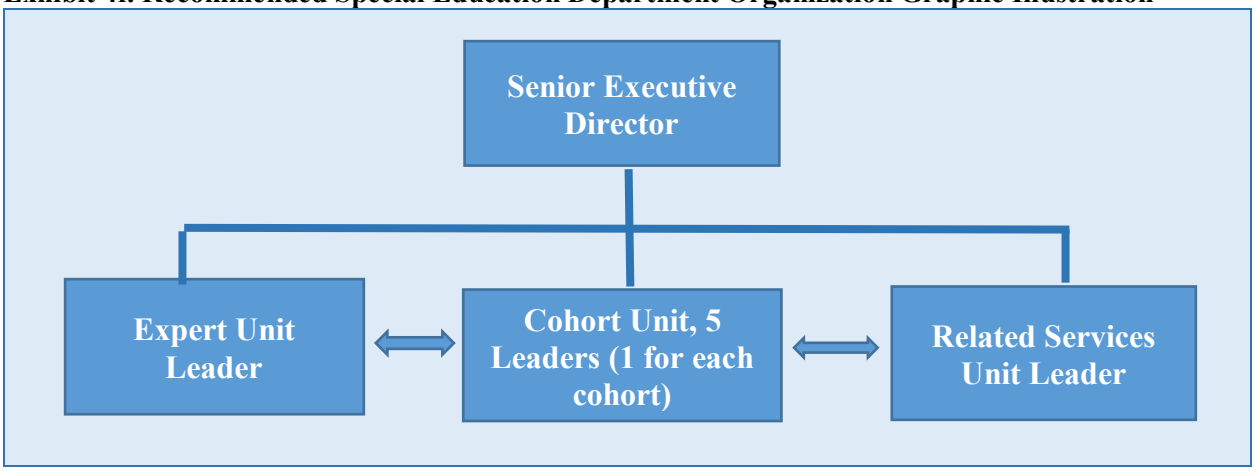
To free up a sufficient number of personnel for each cohort, this unit should be as small as possible – yet have a sufficient number of personnel to carry out expectations for their collective practice.

- ***Cohort Unit.*** With five leaders (one for each cohort), free up as many current slots as possible and establish new administrative positions (at least two) for each cohort leader. These personnel, with support from the expert leaders, should have the knowledge, skills, and experience to help teachers support the academic and social/emotional needs of their students.

  The goal would to provide each cohort administrator with a reasonable number of schools to carry out his or her expected roles and responsibilities. In collaboration with the senior executive director, and relevant cohort and principal leaders, consider having one staff member be responsible for compliance and the other for teaching/learning. Have each cohort staff member and leader (with a fewer number of schools) be responsible for collaborating with their respective principals and supporting all special education teachers in their schools. In this way, each staff member can assist in developing a more flexible special education delivery system, solve problems, and support placements.

- ***Related Services Unit.*** This unit currently has one interim deputy executive director, one director, eight supervisors, and one coordinator. Reduce the number of supervisors and assign lead personnel to support the supervisor in areas with large numbers of staff. At a minimum, have one supervisor each for psychology, social workers, and teachers. Provide lead personnel with a reduced caseload and stipends.

Exhibit 4f. Recommended Special Education Department Organization Graphic Illustration



b. Special Education Department Management

- ***Evaluation of Related Services Personnel.*** Consider having principals evaluate related services personnel who work in their schools. The Council team can provide the names of other large urban districts that operate in this manner.
- ***Special Education Department Meetings.*** With feedback from special education department personnel, identify the most effective communication processes and frequency with which meetings should be held.
- ***Clerical Staff/Administrative Assistants.*** To the maximum extent possible, use clerical staff and administrative assistants to carry out activities that can be delegated to them to free up administrators for work in areas requiring their expertise.
- ***Consultation with Wayne RESA.*** During the reorganization process, consult with Wayne RESA to ensure that new positions are developed in the most flexible manner while meeting state requirements. If necessary, ask Wayne RESA to consider an amendment to its plan to provide state-approved flexibility that would be helpful but is not currently available. Also, identify how the special education department will ensure consistent attendance at Wayne RESA meetings and provide feedback to other department personnel, principal leaders, principals, and school personnel.
- ***Feedback/Communication.*** Obtain the input of principal leaders, and a representative group of principals and specialized program teachers to explain the draft organization and obtain feedback. Once the reorganization is finalized, communicate it broadly to stakeholders, and post on the district's website. With parent groups, develop and execute a communication plan for parents.
- ***Functional Directory.*** On the district's website and through other venues distribute broadly to stakeholders a functional directory with the new organization that clearly describes who to call for information based on subject areas of interest or need. Base the directory on a pyramid of support, starting at the school level, moving to the school cohort administrator, cohort leader, etc.
- ***Language Translation for Parents.*** Translate the new organizational directory into the most common languages used by parents who have limited English proficiency.
- ***Group Emails to Principals.*** When special education personnel are coordinating information with principals and it is the same across principals, enable special education personnel to send emails when authorized by the special education senior executive director.

c. ***Lead Teachers.*** Expect that every school will have a lead teacher assigned to the school to liaison with the cohort administrator. With a representative group of principals and lead teachers, determine how lead teachers will be able to fulfill his/her roles and responsibilities. Consider reducing caseloads, providing stipends, and other incentives. Provide differentiated mandatory training to lead teachers.

d. ***Student-Staff Ratios.*** Have the deputy superintendent, senior special education executive director, and finance personnel review staffing ratios summarized in this report (see Appendix A) and other caseload data. NOTE: Relatively low or high student-to-personnel ratios in Appendix A do not necessarily mean that an area is staffed inappropriately; however, the ratios should prompt further review. Review caseloads to ensure that adequate numbers of special education and related-services personnel are at each school to carry out

their expected responsibilities. Based on a full review, consider the changes needed short and long term.

e. Vacant Positions. Create a sense of urgency around filling remaining vacant special education and related positions, and to the extent possible replace contractual personnel with DCPSD employees as quickly as feasible.

- ***Vacancy Status.*** Validate vacant positions with principals. Have human resources report monthly to the deputy and the superintendent on how many positions have been filled and the number remaining by personnel area. If current strategies are unlikely to fill remaining positions for the beginning of the 2018-19 school year, problem-solve new approaches that are likely to succeed. One approach would be to contact charter school operates to identify contract agencies they use to fill vacant positions.
- ***Expedite Hiring.*** Provide the superintendent and deputy with information on the range of days necessary to establish a start date for new personnel. If unreasonable, identify measures for shortening the process so personnel are not lost to other districts.

7. Compliance Support, and Data and Fiscal issues. Consider the following actions to improve compliance; address data issues; and enhance revenue.

a. Compliance Support. Special education department personnel, alone, cannot improve special education compliance. This requires the collaboration of principal leaders, principals, and accountability staff.

- ***Special Education and Section 504 Standard Operating Procedures Manuals.*** Expedite completion of manuals on special education and Section 504. Supplement the documents with written expectations proposed in Recommendations 2c and 4c. Establish the two manuals as webpages that have links to more extensive information and public resources. Collaborate with stakeholders, including parents, to identify useful resources and links. Ensure staff members are available to update information regularly. Provide training to stakeholders and parents to boost their understanding of core elements of special education and Section 504, and how to use the webpages. Ensure training is accessible to parents with diverse linguistic needs and sensory limitations.
- ***Section 504 Operations.*** As part of Section 504 training, include information on students with health plans to determine whether they are eligible for Section 504 services. Also determine how current information could be used to make more appropriate eligibility determinations. In addition, ensure that students having a health plan are also reviewed for the need for Section 504 safeguards.
- ***Professional Learning.*** Embed in Recommendation 4b and 4d professional learning to address compliance issues most frequently related to MDE complaints, due process, and OCR complaints, e.g., procedural safeguards for suspended students, prior written notices, and IEP implementation.
- ***Dispute Resolution.*** Expect that every principal and their respective principal leaders will collaborate with the cohort administrator to resolve complaints when resolution is within the principal's control.
- ***IEP System Changes.*** Establish a process for notifying IEP system users of changes to

the system so they can execute them effectively.

- ***Timely IEP Meetings.*** Develop a plan for holding timely IEP team meetings, including–
  - ***Master Schedule.*** Having each school develop a master schedule for 2018-19 that would forecast annual IEP meetings and triennial evaluations/IEP meetings held throughout the school year rather than during only a few months. To do so, schedule triennial and annual IEP meetings earlier than usual to ensure a less concentrated yearly schedule.
  - ***Vacant Special Educator Positions.*** Develop a protocol for principals on developing IEPs and how to include a special educator when the position is not filled by a certified person.
  - ***Supporting Case Managers.*** Develop a protocol for case managers on facilitating participation of IEP team members, and free up case managers to attend meetings.

b. Fiscal Issues. Pursue the following activities to enhance revenue and shift more funds to activities that would boost high-quality education in inclusive and separate classes.

- ***Charter Schools.*** Join with other school districts to use data like that highlighted in this report to bring attention to the legislature the inequitable funding of special education for school districts compared to charters. As part of the district's data collection for this purpose, track students returning to DPSCD from charters, the reasons for their return, and a comparison of IEP services provided by charters and those deemed appropriate by DPSCD.
- ***Center School Budgets.*** Immediately, have DPSCD's senior special education executive director, relevant fiscal, human resources, purchasing personnel, and center school principals meet (with Wayne RESA personnel if helpful) to resolve the purchasing and hiring issues center school principals face when trying to execute their approved Wayne RESA budgets in a timely manner. Have DPSCD personnel share with the deputy superintendent the steps that will be taken and how they will periodically report the status of those steps.
- ***Vendor System.*** Expedite approval of vender numbers for outside providers or evaluators when necessary to provide compensatory services.
- ***Transportation.*** Develop a protocol to guide decision-making for transportation services. See Recommendation 4b.
- ***Medicaid Reimbursement.*** Develop an RFP for Medicaid software to enable DPSCD personnel to easily document electronically service provision for *all* Medicaid-eligible students. Cast a wide net to find the most user-friendly software that will migrate data from and to the district's IEP system. The Council can help identify software used in other districts. This process should enable special education personnel to have valuable information on all students receiving services, provide for retroactive billing for students newly found to be Medicaid eligible, and support the submission of Medicaid claims.

c. Data Collection and Reporting. In addition to Recommendations 1f, 2e, and 4e –

- ***Timely IEPs.*** Develop user-friendly reports by cohort, school, and case manager on the percentage of timely IEPs each year, along with a backlog report showing students who have not received an IEP by the due date and the number of days waiting for an IEP. Have the report available electronically for lead principals, principals, and cohort leaders/administrators. Sort percentages and backlogged IEPs by school, so principals and cohort leaders can quickly identify schools in need. Have cohort leaders work with fellow administrators to identify personnel who can be temporarily deployed to neighboring schools to handle overdue IEPs and evaluations and those that are about to be overdue.
- ***Early Childhood SPP 7 Indicator.*** Ensure that data are entered correctly on early childhood SPP Indicator 7--the numbers of students entering the program below expectation and substantially increased developmentally upon exiting, and numbers meeting age expectations by the time they exit.
- ***Data Reports.*** Have staff who are expert in data reporting review the types of data and charts produced in this report, how these and other relevant information can be reported by school and cohort levels. Determine the extent to which the district's current IEP or other data system can provide similar data. DPSCD should be able to produce such reports without relying on Wayne RESA.
- ***IEP System.*** Have the district review IEP systems available in the market place to compare their current system on whether they are sufficiently advanced in terms of usability, data reporting, ability to migrate with the student information system, and potential migration of current data into a new system. Use this information to determine if the benefits of a new system outweigh keeping the current system.

d. Monitoring and Accountability. In addition to Recommendations 1g, 2f, and 4f--

- ***Strategic Plan.*** Ensure that the district's monitoring of its strategic plan includes indicators on students with IEPs, and that improvement activities take into account evidence-based practices that could inform systemic and school-based improvements.
- ***Student Growth.*** Ensure that metrics tracking student growth address the various circumstances of students with disabilities, especially those receiving instruction based on alternate standards. To the extent that the district is using NWEA data to gauge growth, have the research and assessment staff determine whether the test's growth norms allow students to make adequate progress on state standards.
- ***Accountability Protocol.*** Establish protocols or procedures for resolving disagreements between school personnel and special education personnel. Components should include but not be limited to procedures on school suspensions, the timely entry of transportation data, exiting students, facilitating transfers and new transportation routes, implementing IEPs, securing lead teachers, etc.
- ***Performance Evaluations.*** Embed in performance evaluations relevant indicators on each personnel area's role in carrying out core special education activities under their control.

8. Internal Project Manager. Have a project manager assigned to the superintendent report regularly on progress in implementing leadership's plans and initiatives, including following

up recommendations in this report. Have the project manager report on relevant data, the status of implementation, and barriers to execution that require interdepartmental collaboration, and the need for adjustments to the plan.

CHAPTER 5. SUMMARY OF RECOMMENDATIONS

This chapter summarizes the recommendations made in Chapter 3 in two ways. The first way lists the recommendations from the previous chapter and the functional categories into which each one falls. The categories include accountability, planning, criteria/process, training, data/reports, and cross-references. The second way lists all recommendations, so the reader can see them in one place.

Recommendation Matrix

The exhibit below lists the recommendations from the previous chapter in table form corresponding to their functional categories.

Recommendations	Planning	Standards/Procedures	Training	Data/Repots	Accountability
Multi-tiered System of Supports					
1. ***Systemwide MTSS Framework, Implementation Plan, and Oversight.*** Embed MTSS into the district's Blueprint 2020, making explicit how the strategic plan's provisions fit into the MTSS framework and vice versa. Make clear that the framework includes all students, including students with disabilities, English learners, and accelerated learners.					
a. ***District, Network and School Leadership Teams.*** Establish the following leadership teams at the district, cohort, and school levels to support MTSS planning and oversee implementation activities: District MTSS Leadership Team; Cohort MTSS Leadership Teams; School-Based Leadership Teams; and Resource Coordinating Teams.	X				
b. ***Implementation Plan.*** Develop a multi-year MTSS implementation plan that includes regular updates for the board of education. Have the district's leadership team evaluate the its current methodologies and tools as it develops the district's MTSS framework and plan, including universal screeners, formative assessments, standard protocols for interventions/supports, curricular materials, supplemental and intensive resources, data platforms, use of data, professional learning, budget allocations, etc. In addition, include the following components– framework design; universal design for learning principles; department alignment of staff and priorities to support MTSS plan implementation; social emotional learning goals and expectations; progress monitoring benchmark and other regular districtwide and school-based progress-monitoring tools in the evaluation of MTSS implementation; early school enrollment campaign; master teacher program; school walk throughs; exemplary implementation models; and district website. When finalized, prominently post the MTSS implementation plan on the district's website, along with relevant links to district information and publicly available resources. Communicate widely.	X				
c. ***Map Resources and Analyze/Address Gaps***. As part of the MTSS planning process, assess current human resources and instructional materials provided by the district and funded by schools to ascertain their effectiveness and return-on-investment in terms of improved student outcomes. Compare the value of resources and materials currently in use in the district with other evidence-based resources in the marketplace and replace low-value resources currently being used. Establish a menu of increasingly intensive interventions and resources, which should be vetted against current evidence on effectiveness and alignment. Ensure that the menu of interventions differentiates levels of intensity, criteria for use, and contains strategies that are	X			X	

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Recommendations	Planning	Standards/Procedur	Training	Data/Repots	Accountability
linguistically and culturally appropriate for a diverse student population. Consider how federal Title I resources could enhance, supplement, or pay for more effective interventions. If necessary, phase in new interventions over a reasonably few number of years.					
d. Written Expectations. Establish a school board policy in support of the district's MTSS framework (for academics and social/emotional learning/restorative practices). Charge the administration with developing and implementing an MTSS framework and roll-out plan. Include expectations that the framework will be used, and that it include all grades and students and supports linguistically appropriate and culturally competent instruction. Modify the plan as the district gains experience with it. Use information and resources that district personnel, Wayne RESA, and MIBLSI have developed to inform this work.		X			
e. Differentiated Professional Learning. Based on the MTSS framework, district goals and expectations, and implementation plan, develop and put into place a professional development program to support it. Target it on critical audiences, e.g., general/special educators, related-services personnel, paraprofessionals, and parents. Provide at least four to five days of training each year, if possible, for school-based MTSS leadership teams over the next two years. Base training on the Learning Forward Standards for Professional Learning. Consider how training will be funded, e.g., through stipends, funds for substitute coverage, incentives for after-school and Saturday training, or summer training. Also, consider how training will be differentiated and sustained. In addition address: provide access to differentiated learning; use multiple formats; and use coaching/modeling strategies and cross-functional teams; and high quality trainers.			X		
f. Data Analysis and Reports. Review current data collection, analyses, and reports and supplement them with indicators or metrics that would be useful in determining whether schools use MTSS practices and their relationship to student achievement, e.g., growth based on appropriate instruction and intensive interventions.				X	
g. Monitoring and Accountability. Evaluate the implementation, effectiveness, and results of MTSS, and include the following as part of the assessments: baseline data and fidelity assessments; data checks; and timely communication and feedback.					X
Demographic & Outcome Data					
2. Demographics, Referral and Identification of Disability. Improve the overall consistency and appropriateness of referrals, assessments, and eligibility decisions in special education.					
a. Data Review. With a multi-disciplinary team of staff members in and outside the special education department, review exhibits 2a through 2q (along with MDE's latest SPP results. Include representatives from C/I, English learners, principal leaders, principals, etc. Have the team develop hypotheses about patterns in the results presented in this section. For example, when examining the district's high percentage of students identified as needing special education, investigate what the percentage might be if figures included all public-school students in Detroit or what they might be without students with an IEPs from other districts. (The Council team did not have access to these data.) Include in the data review significantly different disability rates by school and cohort; how disability patterns change by grade; and over and under representation of various student groups.				X	
b. Implementation Plan. Based on these data and the staff's hypotheses about why the patterns look like they do, embed in the MTSS implementation plan activities relevant to the RCTs, including problem-solving, guidance on how to determine whether a student's lack of progress	X				

Recommendations	Planning	Standards/Procedures	Training	Data/Repots	Accountability
is due to a disability or to inadequate access to appropriate core instruction, increasingly intensive interventions, supports, and progress monitoring, etc. (Coordinate this activity with Recommendation 1b.) Also, consider using a playgroup model to assess young children.					
c. ***Written Expectations.*** In each area identified by the multi-disciplinary team as problematic, review district processes, including referrals, assessments, and eligibility, and amend them to provide more specific guidance. Develop: Standard Operating Procedures Manual (Coordinate with Recommendation 7a); RCT Practices (coordinate with Recommendation 1a); Incorporate relevant to ELs, such as that included in MDE's Guidance Handbook for Educators of English Learners with Suspected Disabilities; and guidance on evaluating students' lack of progress and relationship to Section 504 and special education evaluations; establish guidelines for determining when and under what circumstances a student no longer needs special education to progress educationally.		X			
d. ***Differentiated Professional Learning.*** Plan for and provide all relevant district stakeholders with the professional development they need to implement the recommendations in this report. Have personnel from the special education and English language learner departments collaborate on the referral and assessment needs of EL students. (Coordinate this activity with Recommendation 1e.)			X		
e. ***Data Analysis and Reports.*** Develop and provide regular user-friendly summary reports to district leadership showing data like those in exhibits 2a through 2m. Share data by cohort and by school within cohorts.				X	
f. ***Monitoring and Accountability.*** Develop a process for ongoing monitoring of expected referrals, evaluations, and eligibility practices. Rather than using a traditional record-review compliance model, review data with schools so that they are aware of problems, and they are better prepared for follow-up action. Enable staff to observe best practices and receive coaching that will improve their knowledge and skills. (Coordinate this activity with Recommendation 1g.) Consider folding disability rates into cohort and school accountability systems.					X
g. ***Timely Evaluation and Annual Review Work Group.*** Convene a group of multi-disciplinary personnel, including representatives from PEC, principals and other school staff members,	X				
3. ***Review of Data Related to Teaching and Learning.*** Assemble a multidisciplinary team and review achievement data (exhibits 3a, 3c-g, and 3dd-ee); suspension data (3m-o); educational environments (3g-l); special program configurations (3p-u, 3w, 3z, and 3bb), students from other districts (3v); percentages of students with IEPs by school (3x); and other relevant data. Develop hypotheses around the patterns of results found and set goals for improvement as the district implements the Council team's recommendations and other proposals. Build strategies around each improvement goal, especially Recommendation 4 that is intended to improve inclusive and high-quality teaching and learning. Assess the resources and supports needed to implement each strategy.				X	
Improving Instruction & Supports					
4. ***Expansion of Inclusive Education and Provision of High Quality Instruction and Supports.*** Begin the process of providing special education services in more inclusive educational settings to students with disabilities to ensure more equitable access to school choice and high-quality instruction. To build a culture and climate for this purpose, consider using an experienced consultant who has had successful outcomes in this area to help facilitate planning and implementation.					

Recommendations	Planning	Standards/Procedures	Training	Data/Repots	Accountability
a. ***Inclusive Education Vision.*** Establish a school board policy stating a clear and defined vision for DPSCD on the value of inclusivity and that reinforces the district's commitment to improving academic achievement and social/emotional well-being for students with disabilities.	X				
b. ***Implementation Plan.*** With the multidisciplinary team assembled pursuant to Recommendation 3, develop a written multi-year action plan that calls for written expectations, professional learning, data analytics, and accountability. To the extent reasonable, embed components in the MTSS implementation plan referenced in Recommendation 1b. Consider the data review referenced in Recommendation 3. Once the plan is completed, establish a way for school-based teams to embed local implementation activities into their strategic school designs and school improvement plans. As part of this process, identify a cadre of schools that volunteer to take the lead in planning and implementing inclusive service designs. Phase in this process over about four years to include all schools. Also, identify general and special education personnel that schools can contact to support their implementation efforts to better meet the needs of students with IEPs. ***Communication.*** When finalized, prominently post the implementation plan on the district's website, along with relevant links to district information and publicly available resources. Communicate the plan widely to all internal and external stakeholders, including parents who are English learners, and share the purpose and expected outcomes of the plan. ***Consultant.*** Hire a consultant who has experience with and positive outcomes in reducing the restrictiveness of educational environments of students, implementing interventions for students with dyslexia, autism, vision/hearing impairments, and improving achievement and positive student behavior generally. This action will expedite effective planning and implementation and serve as a sounding board for DPSCD staff. ***Components.*** When developing the implementation plan, include the following components—increased inclusivity of regular preschool classes; differentiated instruction; effective instruction based on core curricular standards; planned collaboration; positive support for behavior; elimination of "voluntary" out-of-school suspension; instruction of ELs with IEPs; support for students with IEPs taking advanced classes; SLD program evaluation to accelerate literacy; support for students with vision/hearing impairments; provide instruction through flexible service delivery models; with Wayne RESA review and address special program configurations to reduce categorical placements and increase inclusivity; develop a master plan for the equitable placement of specialized programs across the district; ensure sufficient supports available for emotional impairment program; review center schools to consider provision of effective services within regular schools; review and adjust for equitable school disability enrollment and address Detroit Institute of Technology at Cody disproportionality; develop transportation protocol for door-to-door service; address postsecondary transition, path to graduation, community job training, and training for career gaps; review and address placement center issues; develop IEP team decision making worksheets; address assistive technology gaps; clarify roles and responsibilities under Wayne RESA plan; collaborate with parents and obtain feedback from stakeholders throughout this process.	X			X	
c. ***Written Expectations.*** As part of the implementation plan described in Recommendation 4b, develop written expectations on each plan component. (Coordinate with Recommendation 2c.)		X		X	

Recommendations	Planning	Standards/Procedures	Training	Data/Repots	Accountability
d. ***Differentiated Professional Learning and Parent Training.*** Embed in the professional development curriculum (Recommendation 1e) content needed to carry out Recommendation 4. Embed into current walk-through protocols indicators associated with implementation plan components that the district expects to be in place within a specified time-frame.			X		
e. ***Data Analysis and Reports.*** In addition to activities proposed in Recommendation 1e, embed in school performance and planning frameworks data reporting and use of risk ratio measure to report disproportionality da			X	X	
f. ***Monitoring and Accountability.*** Expect all principals to be responsible for overseeing special education in their buildings and hold them explicitly accountable for such. Articulate how cohort principal leaders will work with their principals and how they will exercise their responsibilities to ensure principals are serving students with disabilities. Embed the following activities into the monitoring and accountability systems described in Recommendation 1g. and 2f. Establish data checks; fidelity assessments and walk-throughs that include special education indicators; obtain timely feedback on inclusive education barriers; and monitor informal school removals, timely placements, home placements, and too high caseloads.					X
Organizational Support					
5. ***Department, Cohort, and Special Education Support for Schools.*** Specifically charge senior staff in all central office departments with collaborating with each other to support teaching and learning for students with disabilities. In addition--					
a. ***Superintendent's Cabinet.*** Include the special education senior executive director in cabinet meetings to ensure the director receives direct information about district initiatives and can contribute to discussions.	X				
b. ***Collaborative/Inclusive Discussions and Deliverables.*** Ensure all central office, cohort, and school discussions affecting teaching and learning include special education personnel and others knowledgeable about students with disabilities. Have department representatives from special education and English language learners meet regularly to address mutual responsibilities for English learners who have disabilities, and charge staff with developing and implementing models of effective instruction and supports for English learners with IEPs. (Coordinate with Recommendation 4b.) As part of this collaboration, identify personnel in other departments having interactions with schools who can be aligned to one or more cohorts to build the capacity of principal leaders and principals to support their schools.	X			X	
c. ***Principal Leaders.*** Expect principal leaders and their respective special education cohort leaders (see Recommendation 6a below) to meet at least biweekly to review school data; develop strategic actions based on data with principals having common issues and individual principals having unique issues; develop professional learning for cohort personnel based on Recommendation 4d and other areas of need; and establish monitoring protocols for cohorts based on Recommendation 4f.	X			X	
d. ***Cross-Functional Training.*** Establish a structure for cross-training of personnel from different departments to provide essential information for all principals, leadership teams, and teachers. More personnel should be available to support schools and teachers. In addition, use personnel with specialized expertise beyond what most teachers are expected to know.	X		X		

Recommendations	Planning	Standards/Procedures	Training	Data/Repots	Accountability
6. Special Education Department Organization. The following recommendations are designed to enable special education department personnel to more effectively assist principal leaders, and school personnel to support teaching and learning. The senior executive director should be able to carry out her roles and responsibilities and should have the authority to do so. This includes the ability to make day-to-day decisions on activities within her control. To facilitate relationships between the senior executive director, principal leaders, and principals, she needs to attend principal meetings and have a standing agenda item at those meetings.					
a. Direct Report to Senior Executive Director**.** Have the following positions report directly to the special education director: ***Expert Unit.*** Ensure personnel collectively have the knowledge, experience, and skills to: accelerate literacy for struggling readers, including those with dyslexia; accelerate math achievement; improve instruction aligned with alternate assessments and standards; improve positive behavior for students with the most challenging social/emotional and behavioral needs; and improve postsecondary transition activities and supports, including community-based training. Expert personnel gather the most current evidence- and research-based information; provide leadership on the development of standards of practice and monitoring guidance; provide professional development to other units and schools; and support cohort personnel when they need additional expertise to address issues at schools. In addition to obtaining feedback from cohort and auxiliary personnel, the experts should visit schools periodically to observe and obtain a better understanding of teaching/learning challenges. ***Cohort Unit.*** With five leaders (one for each cohort), free up as many current slots as possible and establish new administrative positions (at least two) for each cohort leader. These personnel, with support from the expert leaders, should have the knowledge, skills, and experience to help teachers support the academic and social/emotional needs of their students. Provide each cohort administrator with a reasonable number of schools to carry out his or her expected roles and responsibilities. In collaboration with the senior executive director, and relevant cohort and principal leaders, consider having one staff member be responsible for compliance and the other for teaching/learning. Have each cohort staff member and leader (with a fewer number of schools) be responsible for collaborating with their respective principals and supporting all special education teachers in their schools. In this way, each staff member can assist in developing a more flexible special education delivery system, solve problems, and support placements. ***Related Services Unit.*** Reduce the number of supervisors and assign lead personnel to support the supervisor in areas with large numbers of staff. At a minimum, have one supervisor each for psychology, social workers, and teachers. Provide lead personnel with a reduced caseload and stipends.	X				
b. Special Education Department Management. Address: evaluation of related services personnel; improved special education department meetings; use of clerical staff and administrative assistants; consultation with Wayne RESA to coordinate reorganization process; obtain principal leaders and stakeholder feedback throughout reorganization process; functional directory of staff support; translation of information for parents; and simplify communication to principals through email.	X				
c. Lead Teachers. Expect that every school will have a lead teacher assigned to the school to liaison with the cohort administrator. With a representative group of principals and lead teachers, determine how lead teachers will be able to fulfill his/her roles and responsibilities.	X		X		

Recommendations	Planning	Standards/Procedures	Training	Data/Repots	Accountability
Consider reducing caseloads, providing stipends, and other incentives. Provide differentiated mandatory training to lead teachers.					
d. Student-Staff Ratios. Have the deputy superintendent, senior special education executive director, and finance personnel review staffing ratios summarized in this report (see Appendix A) and other caseload data. NOTE: Relatively low or high student-to-personnel ratios in Appendix A do not necessarily mean that an area is staffed inappropriately; however, the ratios should prompt further review. Review caseloads to ensure that adequate numbers of special education and related-services personnel are at each school to carry out their expected responsibilities. Based on a full review, consider the changes needed short and long term.	X			X	
e. Vacant Positions. Create a sense of urgency around filling remaining vacant special education and related positions, and to the extent possible replace contractual personnel with DCPSD employees as quickly as feasible. Validate vacant positions with principals and have human resources report monthly vacancies to deputy and superintendent; review hiring process to and expedite hires.	X	X			X
Compliance Support, Fiscal Issues & Accountability					
7. Compliance Support, and Data and Fiscal issues.					
a. Compliance Support. Through collaboration of principal leaders, principals, and accountability staff: develop Special Education and Section 504 Standard Operating Procedures Manuals; consider eligibility of students on health plans for Section 504; embed in Recommendation 4b and 4d professional learning to address compliance issues most frequently related to MDE complaints, due process, and OCR complaints; expect that every principal and their respective principal leaders will collaborate with the cohort administrator to resolve complaints when resolution is within the principal's control; and establish process for notifying users of IEP system changes. Develop a plan to support timely IEP meetings and include: master schedule requirements; vacant special educator position protocol; and support for case managers to ensure they and required IEP team participants attend meetings.	X	X	X	X	X
b. Fiscal Issues. Pursue the following activities to enhance revenue and shift more funds to activities that would boost high-quality education in inclusive and separate classes. Address issues related to charter schools; center school budgets; vendor system for outside compensatory education providers; and issue an RFP for effective Medicaid software to facilitate easy service tracking.	X	X			
c. Data Collection and Reporting. In addition to Recommendations 1f, 2e, and 4e – report data for, monitor and support timely IEPs; correct data for SPP indicator 7 related to early childhood outcomes; reproduce data provided in this report for district and school-based use without relying on Wayne RESA; review IEP systems available in the market place to compare their current system on whether they are sufficiently advanced in terms of usability, data reporting, ability to migrate with the student information system, and potential migration of current data into a new system. Use this information to determine if the benefits of a new system outweigh keeping the current system.	X		X		
d. Monitoring and Accountability. In addition to Recommendations 1g, 2f, and 4f—ensure the district's monitoring of its strategic plan includes indicators on students with IEPs, and that improvement activities take into account evidence-based practices that could inform systemic and school-based improvements. Include student growth metrics, protocols or procedures for				X	X

resolving disagreements between school personnel and special education personnel. Components should include but not be limited to procedures on school suspensions, the timely entry of transportation data, exiting students, facilitating transfers and new transportation routes, implementing IEPs, securing lead teachers, etc. Embed in performance evaluations relevant indicators on each personnel area's role in carrying out core special education activities under their control.					
Recommendations	**Planning**	**Standards/Procedures**	**Training**	**Data/Repots**	**Accountability**
8. ***Internal Project Manager.*** Have a project manager assigned to the superintendent report regularly on progress in implementing leadership's plans and initiatives, including following up recommendations in this report. Have the project manager report on relevant data, the status of implementation, and barriers to execution that require interdepartmental collaboration, and the need for adjustments to the plan.	X			X	X

List of Recommendations

1. ***Systemwide MTSS Framework, Implementation Plan, and Oversight.*** Embed MTSS into the district's Blueprint 2020, making explicit how the strategic plan's provisions fit into the MTSS framework and vice versa. Make clear that the framework includes all students, including students with disabilities, English learners, and accelerated learners.

   a. ***District, Network and School Leadership Teams.*** Establish leadership teams at the district, cohort, and school levels to support MTSS planning and oversee implementation activities.

   - ***District MTSS Leadership Team.*** Have the deputy superintendent and senior executive director of C/I share responsibility for the development and implementation of MTSS across the system, utilizing a team of stakeholders, e.g., cohort leaders, central office personnel, principals, and school-based personnel. When completed, schedule a two-day overview for staff and monthly meetings with the MTSS leadership team to ensure use of a common language, effective implementation, and effective resource allocations.
   - ***Cohort MTSS Leadership Teams.*** Have each cohort establish an MTSS leadership team with principals and a diverse group of school personnel who would be responsible for implementation.
   - ***School-Based Leadership Teams.*** Based on the district's MTSS-implementation plan (Recommendation1b below), establish school-based leadership teams (SBLT) at each site to provide training and guidance on activities that could be incorporated into each school's academic achievement plan. The SBLT should lead each school's MTSS work to ensure a common understanding of the framework. The SBLTs should also have defined responsibilities, such as learning/applying/modeling the problem-solving process, providing professional development and technical assistance, monitoring implementation and supports, and conducting school-based data days.
   - ***Resource Coordinating Teams.*** Establish written parameters for RCTs, including evidence-based guidelines and expectation that RCTs be implemented as designed at every school. Send a common message that RCTs are designed for problem-solving purposes, and they are not a pipeline for special education.

   b. ***Implementation Plan.*** Develop a multi-year MTSS implementation plan that includes regular updates for the board of education. Have the district's leadership team evaluate the its current methodologies and tools as it develops the district's MTSS framework and plan, including universal screeners, formative assessments, standard protocols for interventions/supports, curricular materials, supplemental and intensive resources, data platforms, use of data, professional learning, budget allocations, etc. In addition, include the following components–

   - ***Framework Design.*** Review information from MIBLSI, Wayne RESA, and the DPI RtI Handbook and Tool Kit, and supplement them based on current best practices, including information for elementary, middle, and high school grade levels.
   - ***UDL.*** Embed universal design for learning (UDL) principles into the MTSS framework, and incorporate items discussed below.

- ***Department Alignment.*** Require each department to realign staff and priorities to support the MTSS plan's implementation. Ensure department deliverables are collaboratively developed and do not produce competing priorities across schools.
- ***Social Emotional Learning.*** Establish goals and expectations that schools would provide social emotional learning (SEL) as part of its MTSS work, including the use of a SEL curriculum, community wraparound services, etc.
- ***Progress Monitoring.*** Include benchmark and other regular districtwide and school-based progress-monitoring tools in the evaluation of MTSS implementation. Consider whether to continue using both IReady and MIBLSI or have one set of data systemwide.
- ***Early School Enrollment.*** Consider a citywide campaign designed to educate parents about the value of enrolling their children in early childhood programs and in kindergarten. Communicate resources to help parents access these programs.
- ***Master Teacher Program.*** Add components to the Master Teacher Program to support positive student social/emotional wellbeing and behavior. Ensure that participants are knowledgeable about teaching and learning with students with disabilities, students who are twice exceptional, English learners and those with disabilities, and gifted students.
- ***School Walk Throughs.*** Include in current walk-through protocols any elements of MTSS that current tools do not contain. Follow-up walkthrough results to identify trends, strengths, and action items. Walkthroughs should be non-evaluative, but results should be aggregated in a way that would inform central office strategies.
- ***Exemplary Implementation Models***. Provide a forum where schools can highlight and share best practices, lessons learned, victories, and challenges in implementing MTSS for *all* student groups. Identify and encourage staff to visit exemplary schools and set aside time for that to happen.
- ***District Website.*** Develop a highly visible, well-informed, and interactive web page highlighting the district's MTSS framework. Include links to other local and national sites. Highlight schools in the district that are showing results with the approach and share stories and data on the impact of MTSS on student outcomes.

Communication. When finalized, prominently post the MTSS implementation plan on the district's website, along with relevant links to district information and publicly available resources. Communicate widely with all internal and external stakeholders, including parents who are English learners, and share the purposes and expected outcomes of the plan.

c. Map Resources and Analyze/Address Gaps. As part of the MTSS planning process, assess current human resources and instructional materials provided by the district and funded by schools to ascertain their effectiveness and return-on-investment in terms of improved student outcomes. Compare the value of resources and materials currently in use in the district with other evidence-based resources in the marketplace and replace low-value resources currently being used. Establish a menu of increasingly intensive interventions and resources, which should be vetted against current evidence on effectiveness and alignment. Ensure that the menu of interventions differentiates levels of intensity, criteria for use, and contains strategies that are linguistically and culturally appropriate for a

diverse student population. Consider how federal Title I resources could enhance, supplement, or pay for more effective interventions. If necessary, phase in new interventions over a reasonably few number of years.

d. ***Written Expectations.*** Establish a school board policy in support of the district's MTSS framework (for academics and social/emotional learning/restorative practices). Charge the administration with developing and implementing an MTSS framework and roll-out plan. Include expectations that the framework will be used, and that it include all grades and students and supports linguistically appropriate and culturally competent instruction. Modify the plan as the district gains experience with it. Use information and resources that district personnel, Wayne RESA, and MIBLSI have developed to inform this work.

e. ***Differentiated Professional Learning.*** Based on the MTSS framework, district goals and expectations, and implementation plan, develop and put into place a professional development program to support it. Target it on critical audiences, e.g., general/special educators, related-services personnel, paraprofessionals, and parents. Provide at least four to five days of training each year, if possible, for school-based MTSS leadership teams over the next two years. Base training on the Learning Forward Standards for Professional Learning. Consider how training will be funded, e.g., through stipends, funds for substitute coverage, incentives for after-school and Saturday training, or summer training. Also, consider how training will be differentiated and sustained. In addition –

- ***Access to Differentiated Learning.*** Ensure that professional learning is engaging and differentiated based on individual skills, experience, and need. Have professional learning and technical assistance continue for new personnel and those needing additional support.
- ***Multiple Formats.*** Use multiple formats (e.g., videos, webinars, and narrative text) and presentation approaches (e.g., school-based, small groups) to provide professional development on MTSS.
- ***Coaching/Modeling.*** Develop a plan to provide coaching and technical assistance to principals and school-based leadership teams on practices covered in training sessions and materials.
- ***Cross-Functional Teams.*** Cross-train individuals from all departments working with schools to ensure a common language and understanding of MTSS. This will help align and support schools as they work on implementation. Provide direct support, mentoring, coaching, and technical assistance to principals and teachers on implementation.
- ***High-Quality Trainers.*** Identify staff members at all levels who are knowledgeable about and experienced in the components of MTSS and deploy them as professional developers. As necessary, supplement these staff members with experts from outside the school district.

f. ***Data Analysis and Reports.*** Review current data collection, analyses, and reports and supplement them with indicators or metrics that would be useful in determining whether schools use MTSS practices and their relationship to student achievement, e.g., growth based on appropriate instruction and intensive interventions.

g. ***Monitoring and Accountability.*** Evaluate the implementation, effectiveness, and results of MTSS, and include the following as part of the assessments–

- ***Baseline Data and Fidelity Assessments.*** Use the Self-Assessment of MTSS (SAM) or other protocols for schools to self-assess their MTSS practices. Have network and districtwide leadership teams periodically review these self-assessments for validity. Incorporate SAM results into the school review process to assess fidelity to the framework.
- ***Data Checks.*** Using data and reports proposed in Recommendation 1f, have the superintendent, deputy superintendent, and senior executive director for C/I host regular data conversations with departments, network leaders, and principals to discuss results, anomalies, needed supports, follow-up activities, and outcomes.
- ***Timely Communication and Feedback.*** Assign responsibility for communicating the MTSS work to stakeholders through multiple channels, e.g., website, television, radio, social media, etc. Design feedback loops involving central office, school personnel, parents, and the community to assess problems and successes on the ground. Use this feedback to provide regular and timely feedback to the district MTSS leadership team on where and how schools require additional assistance.

2. ***Demographics, Referral and Identification of Disability.*** Improve the overall consistency and appropriateness of referrals, assessments, and eligibility decisions in special education.

a. ***Data Review.*** With a multi-disciplinary team of staff members in and outside the special education department, review exhibits 2a through 2q (along with MDE's latest SPP results. Include representatives from C/I, English learners, principal leaders, principals, etc. Have the team develop hypotheses about patterns in the results presented in this section. For example, when examining the district's high percentage of students identified as needing special education, investigate what the percentage might be if figures included all public-school students in Detroit or what they might be without students with an IEPs from other districts. (The Council team did not have access to these data.) Include in the data review significantly different disability rates by school and cohort; how disability patterns change by grade; and over and under representation of various student groups.

b. ***Implementation Plan.*** Based on these data and the staff's hypotheses about why the patterns look like they do, embed in the MTSS implementation plan activities relevant to the RCTs, including problem-solving, guidance on how to determine whether a student's lack of progress is due to a disability or to inadequate access to appropriate core instruction, increasingly intensive interventions, supports, and progress monitoring, etc. (Coordinate this activity with Recommendation 1b.) Also, consider using a playgroup model to assess young children.

c. ***Written Expectations.*** In each area identified by the multi-disciplinary team as problematic, review district processes, including referrals, assessments, and eligibility, and amend them to provide more specific guidance.

- ***Standard Operating Procedures Manual***. Ensure that the district's comprehensive standard-operating-procedures manual for special education incorporates this guidance. (Coordinate with Recommendation 7a.)

- ***RCT Practices.*** Require that RCTs function within an MTSS framework, and that personnel who assess students for special education consider the extent to which students might benefit from increasingly intensive interventions based on problem-solving and progress monitoring. (Coordinate this activity with Recommendation 1a.)
- ***English Learners.*** Incorporate in the manual information relevant to ELs, such as that included in MDE's Guidance Handbook for Educators of English Learners with Suspected Disabilities.
- ***Lack of Progress.*** Provide guidance on evaluating students' lack of progress. Have RCTs include in their procedures appropriate referrals for Section 504 services as well as for special education.
- ***Referral Practices.*** Make sure that written guidance and practice is included on parental requests for a special education evaluation when there is evidence of a suspected disability.
- ***Exiting Special Education.*** Establish guidelines for determining when and under what circumstances a student no longer needs special education to progress educationally. A transition to services under Section 504 may be appropriate for such children.

Recommendations relevant to the timely transition of students from Part C services, and proposals on timely IEPs are provided later in this report. (See IV. Support for Teaching and Learning for Students with Disabilities, Accountability.)

d. Differentiated Professional Learning. Plan for and provide all relevant district stakeholders with the professional development they need to implement the recommendations in this report. Have personnel from the special education and English language learner departments collaborate on the referral and assessment needs of EL students. (Coordinate this activity with Recommendation 1e.)

e. Data Analysis and Reports. Develop and provide regular user-friendly summary reports to district leadership showing data like those in exhibits 2a through 2m. Share data by cohort and by school within cohorts.

f. Monitoring and Accountability. Develop a process for ongoing monitoring of expected referrals, evaluations, and eligibility practices. Rather than using a traditional record-review compliance model, review data with schools so that they are aware of problems, and they are better prepared for follow-up action. Enable staff to observe best practices and receive coaching that will improve their knowledge and skills. (Coordinate this activity with Recommendation 1g.) Consider folding disability rates into cohort and school accountability systems.

3. Review of Data Related to Teaching and Learning. Assemble a multidisciplinary team and review achievement data (exhibits 3a, 3c-g, and 3dd-ee); suspension data (3m-o); educational environments (3g-l); special program configurations (3p-u, 3w, 3z, and 3bb), students from other districts (3v); percentages of students with IEPs by school (3x); and other relevant data. Develop hypotheses around the patterns of results found and set goals for improvement as the district implements the Council team's recommendations and other proposals. Build strategies around each improvement goal, especially Recommendation 4 that is intended to improve

inclusive and high-quality teaching and learning. Assess the resources and supports needed to implement each strategy.

4. ***Expansion of Inclusive Education and Provision of High Quality Instruction and Supports.*** Begin the process of providing special education services in more inclusive educational settings to students with disabilities to ensure more equitable access to school choice and high-quality instruction. To build a culture and climate for this purpose, consider using an experienced consultant who has had successful outcomes in this area to help facilitate planning and implementation.

   a. ***Inclusive Education Vision.*** Establish a school board policy stating a clear and defined vision for DPSCD on the value of inclusivity and that reinforces the district's commitment to improving academic achievement and social/emotional well-being for students with disabilities. Highlight the importance of central office support and principal leadership for providing students with IEPs with the differentiated and scaffolded instruction they need to learn in general education settings. State that a student's needs - not their disability label - should drive the type or location of services. Expect that students will receive rigorous core instruction that is linguistically appropriate and culturally relevant. These expectations should be within greater reach when school personnel are provided the resources and supports they need, and as teachers become more familiar with and base their instruction on the principles of UDL. At the same time, the district's vision should underscore the importance of evidence-based academic and positive behavior interventions/supports. Furthermore, once students are receiving special education instruction, the intensity of interventions should be stronger than (not less than) interventions otherwise available to students without IEPs.

   b. ***Implementation Plan.*** With the multidisciplinary team assembled pursuant to Recommendation 3, develop a written multi-year action plan that calls for written expectations, professional learning, data analytics, and accountability. To the extent reasonable, embed components in the MTSS implementation plan referenced in Recommendation 1b. Consider the data review referenced in Recommendation 3. Once the plan is completed, establish a way for school-based teams to embed local implementation activities into their strategic school designs and school improvement plans.

      As part of this process, identify a cadre of schools that volunteer to take the lead in planning and implementing inclusive service designs. Phase in this process over about four years to include all schools. Also, identify general and special education personnel that schools can contact to support their implementation efforts to better meet the needs of students with IEPs.

      Communication. When finalized, prominently post the implementation plan on the district's website, along with relevant links to district information and publicly available resources. Communicate the plan widely to all internal and external stakeholders, including parents who are English learners, and share the purpose and expected outcomes of the plan.

      Consultant. Hire a consultant who has experience with and positive outcomes in reducing the restrictiveness of educational environments of students, implementing interventions for students with dyslexia, autism, vision/hearing impairments, and improving achievement

and positive student behavior generally. This action will expedite effective planning and implementation and serve as a sounding board for DPSCD staff.

Components. When developing the implementation plan, include the following components—

- ***Early Childhood.*** Increase the number of children educated inclusively in regular preschool classes--with no more than 50 percent and close to 30 percent of classes composed of children with disabilities. The Council team can provide DPSCD with names of other school districts that have done so effectively. When more children are successful in inclusive classrooms, there will be higher expectations that these opportunities will continue in kindergarten, enhance equitable school choices, and spur high-quality education for students with disabilities.
- ***Differentiated Instruction.*** Provide linguistically appropriate and culturally competent instruction aligned with core standards, differentiated for students with reading and math performance significantly below those of their classroom peers.
- ***Effective Instruction Based on Core Curricular Standards.*** Improve instruction aligned to core curricular standards and expand increasingly intensive interventions, especially in literacy and math, to reinforce standards-based instruction. Consider augmenting the commercial reading and programs with additional foundational materials that would address alignment issues. Specify interventions in English language arts and math that are evidence-based and can fill instructional gaps for students with IEPs who are behind academically. Provide for flexible groupings of students when there is a need for common interventions, and adjust the groupings based on changing student needs.
- ***Planned Collaboration.*** Expect collaboration among general and special educators, paraprofessionals, and related-services personnel in providing instruction and interventions for students they have in common.
- ***Positive Support for Behavior.*** Enhance the knowledge of and supports for teachers who work with students with challenging behavior to reinforce time engaged in teaching and learning. Plan for the expansion and identification of personnel available for observing classrooms, modeling effective practices, and coaching in schools with no other internal expertise. Also, undertake activities needed to support the development of meaningful functional behavior assessments and behavior intervention plans.
- ***Elimination of "Voluntary" Out-of-school Suspension.*** Explicitly prohibit sending students home "voluntarily" in lieu of a formal suspension with documentation and notice to parents.
- ***English Learners with IEPs.*** Bring together personnel from the English learner and special education departments, along with others with instructional expertise, to articulate necessary interventions for ELs with IEPs. Based on a review of current models, identify best practices in the systemic implementation of special education and language acquisition strategies.
- ***Advanced Classes.*** Review gaps in the provision of IEP-accommodations for students taking advanced classes to identify necessary steps to meet student needs.

- ***Specific Learning Disabilities Program.*** Review the SLD program to determine how more students could receive core instruction in general education classes, supplemented by evidence-based intensive interventions designed to accelerate literacy. Address the large proportion of students with IEPs who have poor reading skills, and the high percentage of those students likely to have dyslexia. School districts with which we are familiar have established clustered programs with evidence-based intensive interventions. They often find that centralized approaches reach *some but not every* student who would benefit from such interventions. Having all such students attend a centralized program is neither realistic nor advisable. A combined menu of intensive interventions designed to address various reading, writing and other needs – along with professional development for general and special education personnel to deliver the interventions – is necessary to reach a larger number of students with need.
- ***Support for Students with Vision/Hearing Impairments.*** Identify service gaps and school districts that have high outcomes among students with these disabilities when educated in regular schools. The Council can offer examples of such school districts.
- ***Flexible Service Delivery Models.*** Define effective models for supporting students in general education classes using a flexible service model. Such models should 1) improve teaching/learning of students in general education classes using a flexible service delivery model; 2) expand options for students who would otherwise attend specialized programs to receive more effective instruction in general education classes; 3) support English learners with IEPs to address their language acquisition needs as well as their instructional needs related to their disabilities; 4) schedule common planning time for special and general educators who work with the same students; and 5) increase the proportionate share of students with IEPs at schools with low percentages.
- ***Special Program Configuration.*** Review DPSCD's special program configuration and investigate with Wayne RESA other special program configurations in other RESAs that enable schools to offer clustered instruction based on student needs rather than categorical disability areas. Plan to modify the current program configuration to put more emphasis on common learning needs rather than disability characteristics. Ensure that each specialized program is available at all grade levels and that all programs, including those for students with severe cognitive impairments and severe multiple impairments, have classes available in regular schools.
- ***Master Plan.*** Develop a master plan for the equitable placement of specialized programs across the district. Include facilities and transportation personnel in these discussions.
- ***Emotional Impairment Program.*** Review the emotional impairment and day treatment programs. Ensure that by next school year there are sufficient supports for students who need high intensity interventions at the high school level in regular schools, and that students in day-treatment programs have access to courses leading to a high school diploma.
- ***Reliance on Center Schools.*** Determine the types of instruction, services, and physical and material resources necessary to effectively educate in regular schools those students who would otherwise be placed in center schools. Collaborate with Wayne

RESA on this. Include visits to other school districts in Michigan and elsewhere to observe regular schools successfully educating these students.

- ***Parent Communication.*** Outline how information can be better shared with parents about options for their children to be educated effectively in more inclusive settings. Collaborate and communicate with parents more effectively.
- ***Disproportionate Special Education Enrollments.*** Review schools with enrollments having disproportionately high and low SPED enrollments and address the proximate causes of these disparities. Reduce the high proportion of students with IEPs at Detroit Institute of Technology at Cody.
- ***Transportation Protocol.*** Develop a protocol for IEP teams to determine student need for door-to-door transportation, specialized equipment, etc. Include transportation personnel and other stakeholders in the protocol's development.
- ***Postsecondary Transition Planning.*** Determine how IEP teams can be provided with practice and feedback on written parameters used for state monitoring of postsecondary transition expectations. Collaborate with Wayne RESA in this process.
- ***Path to Graduation.*** Based on data and focus group feedback, identify and act on the most common reasons students with IEPs do not graduate with a diploma, e.g., access to courses necessary for graduation, failing grades, absences, etc.
- ***Training for Careers.*** Identify the gap between students needing career training and options available, the resources necessary to support their training needs at career technical centers, and activities needed to fill gaps.
- ***Community-based Job Training.*** Expand opportunities for students who would benefit from community-based job training, including students in regular high schools. Use the resources and expertise of external partners to assist with planning and execution.
- ***Placement Center.*** Take steps to implement a school-based enrollment process for schools of various types that would be inclusive of all students with IEPs, including:
  - ***Records.*** Obtaining records from prior schools and school districts;
  - ***Interim Services.*** Determining how interim services could be provided at local schools if it is ascertained that the school does not have the resources currently available to meet a student's IEP-identified needs.
  - ***Communication.*** Processes for communicating with receiving schools and with parents.
  - ***Immediate Concerns.*** Address immediate placement center concerns, e.g., increasing the number of phone lines, reception of parents, etc.
  - ***Time Frame.*** Specify the maximum time frame (not to exceed 10 days) for identifying optional schools for students when necessary, arranging for transportation, and facilitating student transfers.
- ***Immediate Instruction and Service Delivery.*** Eliminate the need for students to be home waiting for placement.
- ***IEP Decision Making.*** Establish worksheets for IEP teams when they are considering–

  - ***General Education Classes.*** Students' education in general education classes and supports needed for core instruction and evidence-based interventions.
  - ***Special Programs.*** Students' learning levels in specialized education programs. Clarify that low grades (without an examination of appropriate instruction, interventions, and supports provided) should not drive placement.

- ***Assistive Technology.*** Consider resource gaps with students who would benefit from assistive technology, especially those who are nonverbal, and how to expand their access to devices and services.
- ***Wayne RESA Plan.*** Clarify for all relevant administrators and staff members their roles and responsibilities regarding the Wayne RESA Plan for the Delivery of Special Education, the Act 18 Agreement, the Act 18 Budget process, and center program procedures. Build this into the implementation plan.
- ***Parent Concerns.*** Collaborate with parents on the creation of a special education advisory council for each cohort, and possibly a districtwide advisory council. Also, consider structured ways that parents could voice their concerns on a regular basis, beginning at the school level and continuing through the cohort level. Determine how special education department personnel would support this process. Consider how concerns will be documented and addressed within a reasonable time frame.

Feedback. Collect feedback on the draft improvement plan from stakeholders at varying grade levels, and among special/general education administrators, principals, general/special education teachers, related-service providers, teacher assistants, parents, and community-based organizations. Continue this feedback loop as the plan is implemented to identify and address concerns.

c. ***Written Expectations.*** As part of the implementation plan described in Recommendation 4b, develop written expectations on each plan component. (Coordinate with Recommendation 2c.)

d. ***Differentiated Professional Learning and Parent Training.*** Embed in the professional development curriculum (Recommendation 1e) content needed to carry out Recommendation 4. Embed into current walk-through protocols indicators associated with implementation plan components that the district expects to be in place within a specified time-frame.

In addition, consider –

- How training will be provided using a multidisciplinary and interdepartmental approach, so that professional learning to promote inclusive education is not viewed *incorrectly* as a "special education" initiative;
- How and when all personnel will be trained in each critical area;
- How key information will be communicated effectively, including the use of on-line training for compliance issues that are more rote in nature;
- How information will be used;
- How all stakeholder groups will be included, e.g., principals, general and special educators, clinicians, paraprofessionals, etc.

- What additional coaching and supports may be needed;
- Principal leadership training necessary to maximize and leverage inclusive and high-quality instruction and supports, including training on flexible uses of school-based budgets to expand inclusive education; and
- Engaging Wayne RESA and stakeholders on expanding training opportunities for parents.

e. Data Analysis and Reports. In addition to activities proposed in Recommendation 1e, embed in school performance and planning frameworks--

- ***Data Reporting.*** The types of data needed to better target patterns and areas of concern.
- ***Risk Ratios.*** Report disparities using a risk ratio to better understand district practices and their effects.

f. Monitoring and Accountability. Expect all principals to be responsible for overseeing special education in their buildings and hold them explicitly accountable for such. Articulate how cohort principal leaders will work with their principals and how they will exercise their responsibilities to ensure principals are serving students with disabilities. Embed the following activities into the monitoring and accountability systems described in Recommendation 1g. and 2f.

- ***Data Checks.*** Include information on students with disabilities in data discussions to inform follow-up actions and track outcomes. Ensure that data includes all SPP indicators.
- ***Fidelity Assessments and Walk-Throughs.*** Review walk-through tools used to support instruction and interventions in general education classes, resource classes, and special programs to see how students are being taught. Initiate technical assistance, professional development, coaching, and mentoring to improve practices.
- ***Timely Communication and Feedback***. Establish a process for timely feedback to the district's MTSS leadership team on barriers to inclusive education.
- ***Monitor.*** Monitor and follow up on –
  - ***Informal School Removals.*** Students who are sent home without documenting out-of-school suspensions.
  - ***Placement.*** Extent to which students receive placements within expected time frames.
  - ***Waiting for placement.*** Students at home while waiting for placement.
  - ***Too High Caseloads.*** How special education teacher caseloads can be monitored on a continuing basis using electronic data that is gathered at the school level.

5. Department, Cohort, and Special Education Support for Schools. Specifically charge senior staff in all central office departments with collaborating with each other to support teaching and learning for students with disabilities. In addition--

a. ***Superintendent's Cabinet.*** Include the special education senior executive director in cabinet meetings to ensure the director receives direct information about district initiatives and can contribute to discussions.

b. ***Collaborative/Inclusive Discussions and Deliverables.*** Ensure all central office, cohort, and school discussions affecting teaching and learning include special education personnel and others knowledgeable about students with disabilities. Have department representatives from special education and English language learners meet regularly to address mutual responsibilities for English learners who have disabilities, and charge staff with developing and implementing models of effective instruction and supports for English learners with IEPs. (Coordinate with Recommendation 4b.)

   As part of this collaboration, identify personnel in other departments having interactions with schools who can be aligned to one or more cohorts to build the capacity of principal leaders and principals to support their schools.

c. ***Principal Leaders.*** Expect principal leaders and their respective special education cohort leaders (see Recommendation 6a below) to meet at least biweekly to –

   - ***Review School Data*** on issues delineated in this report and other areas relevant to teaching and learning.
   - ***Strategic Planning.*** Develop strategic actions based on data with principals having common issues and individual principals having unique issues.
   - ***Professional Learning.*** Develop professional learning for cohort personnel based on Recommendation 4d and other areas of need.
   - ***Monitoring.*** Establish monitoring protocols for cohorts based on Recommendation 4f.

d. ***Cross-Functional Training.*** Establish a structure for cross-training of personnel from different departments to provide essential information for all principals, leadership teams, and teachers. More personnel should be available to support schools and teachers. In addition, use personnel with specialized expertise beyond what most teachers are expected to know.

6. ***Special Education Department Organization.*** The following recommendations are designed to enable special education department personnel to more effectively assist principal leaders, and school personnel to support teaching and learning. The senior executive director should be able to carry out her roles and responsibilities and should have the authority to do so. This includes the ability to make day-to-day decisions on activities within her control. To facilitate relationships between the senior executive director, principal leaders, and principals, she needs to attend principal meetings and have a standing agenda item at those meetings. (See exhibit 1 for a graphic illustration for this recommended organization.)

   a. ***Direct Report to Senior Executive Director*.** Have the following positions report directly to the special education director:

      - Expert leader

- Five cohort leaders[99]
- Related services leader

- ***Expert Unit.*** Currently, 16 supervisors[100] are assigned to five cohorts in varying numbers and each has specialized programs they oversee, e.g., ASD, EI, SCI/SXI, etc. Under the supervision of one expert leader identify the expertise necessary for personnel to support cohort leaders and personnel under their supervision. Collectively, expert unit personnel should have the knowledge, experience, and skills to:
  - Accelerate literacy for struggling readers, including those with dyslexia;
  - Accelerate math achievement;
  - Improve instruction aligned with alternate assessments and standards;
  - Improve positive behavior for students with the most challenging social/emotional and behavioral needs;
  - Improve postsecondary transition activities and supports, including community-based training

  These individuals would not supervise "programs" per se. Instead, they would gather the most current evidence- and research-based information; provide leadership on the development of standards of practice and monitoring guidance; provide professional development to other units and schools; and support cohort personnel when they need additional expertise to address issues at schools. In addition to obtaining feedback from cohort and auxiliary personnel, the experts should visit schools periodically to observe and obtain a better understanding of teaching/learning challenges.

  To free up a sufficient number of personnel for each cohort, this unit should be as small as possible – yet have a sufficient number of personnel to carry out expectations for their collective practice.

- ***Cohort Unit.*** With five leaders (one for each cohort), free up as many current slots as possible and establish new administrative positions (at least two) for each cohort leader. These personnel, with support from the expert leaders, should have the knowledge, skills, and experience to help teachers support the academic and social/emotional needs of their students.

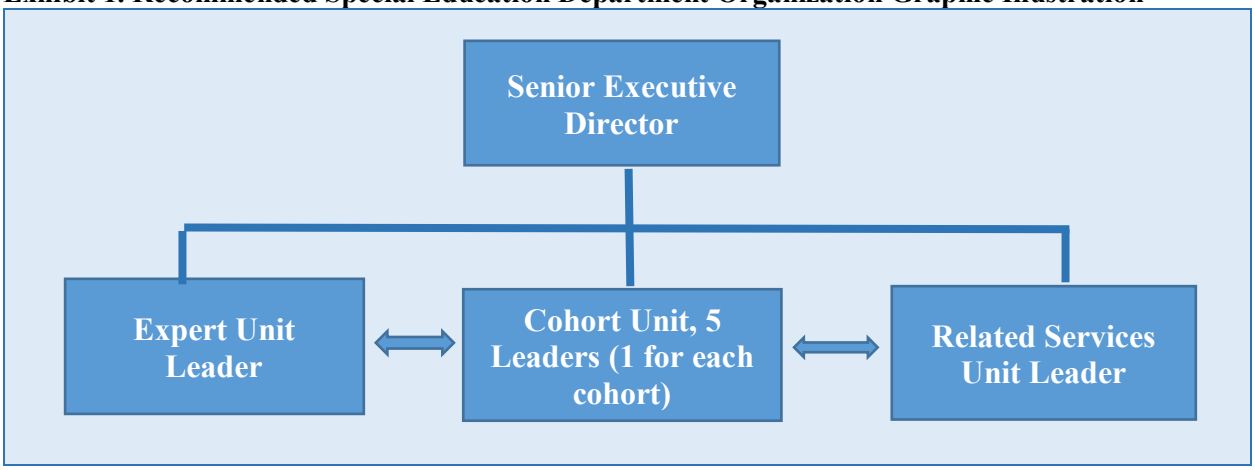
  The goal would to provide each cohort administrator with a reasonable number of schools to carry out his or her expected roles and responsibilities. In collaboration with the senior executive director, and relevant cohort and principal leaders, consider having one staff member be responsible for compliance and the other for teaching/learning. Have each cohort staff member and leader (with a fewer number of schools) be responsible for collaborating with their respective principals and supporting all special education teachers in their schools. In this way, each staff member can assist in developing a more flexible special education delivery system, solve problems, and

[99] Generic terms are used to provide DPSCD with the flexibility to determine the appropriate administrative level(s) for each position.
[100] Based on the December 6, 2017 organizational chart provided to the Council team. Several of these positions are vacant.

support placements.

- ***Related Services Unit.*** This unit currently has one interim deputy executive director, one director, eight supervisors, and one coordinator. Reduce the number of supervisors and assign lead personnel to support the supervisor in areas with large numbers of staff. At a minimum, have one supervisor each for psychology, social workers, and teachers. Provide lead personnel with a reduced caseload and stipends.

Exhibit 1. Recommended Special Education Department Organization Graphic Illustration



b. Special Education Department Management

- ***Evaluation of Related Services Personnel.*** Consider having principals evaluate related services personnel who work in their schools. The Council team can provide the names of other large urban districts that operate in this manner.
- ***Special Education Department Meetings.*** With feedback from special education department personnel, identify the most effective communication processes and frequency with which meetings should be held.
- ***Clerical Staff/Administrative Assistants.*** To the maximum extent possible, use clerical staff and administrative assistants to carry out activities that can be delegated to them to free up administrators for work in areas requiring their expertise.
- ***Consultation with Wayne RESA.*** During the reorganization process, consult with Wayne RESA to ensure that new positions are developed in the most flexible manner while meeting state requirements. If necessary, ask Wayne RESA to consider an amendment to its plan to provide state-approved flexibility that would be helpful but is not currently available. Also, identify how the special education department will ensure consistent attendance at Wayne RESA meetings and provide feedback to other department personnel, principal leaders, principals, and school personnel.
- ***Feedback/Communication.*** Obtain the input of principal leaders, and a representative group of principals and specialized program teachers to explain the draft organization and obtain feedback. Once the reorganization is finalized, communicate it broadly to stakeholders, and post on the district's website. With parent groups, develop and execute a communication plan for parents.
- ***Functional Directory.*** On the district's website and through other venues distribute

broadly to stakeholders a functional directory with the new organization that clearly describes who to call for information based on subject areas of interest or need. Base the directory on a pyramid of support, starting at the school level, moving to the school cohort administrator, cohort leader, etc.

- ***Language Translation for Parents.*** Translate the new organizational directory into the most common languages used by parents who have limited English proficiency.
- ***Group Emails to Principals.*** When special education personnel are coordinating information with principals and it is the same across principals, enable special education personnel to send emails when authorized by the special education senior executive director.

c. Lead Teachers. Expect that every school will have a lead teacher assigned to the school to liaison with the cohort administrator. With a representative group of principals and lead teachers, determine how lead teachers will be able to fulfill his/her roles and responsibilities. Consider reducing caseloads, providing stipends, and other incentives. Provide differentiated mandatory training to lead teachers.

d. Student-Staff Ratios. Have the deputy superintendent, senior special education executive director, and finance personnel review staffing ratios summarized in this report (see Appendix A) and other caseload data. NOTE: Relatively low or high student-to-personnel ratios in Appendix A do not necessarily mean that an area is staffed inappropriately; however, the ratios should prompt further review. Review caseloads to ensure that adequate numbers of special education and related-services personnel are at each school to carry out their expected responsibilities. Based on a full review, consider the changes needed short and long term.

e. Vacant Positions. Create a sense of urgency around filling remaining vacant special education and related positions, and to the extent possible replace contractual personnel with DCPSD employees as quickly as feasible.

- ***Vacancy Status.*** Validate vacant positions with principals. Have human resources report monthly to the deputy and the superintendent on how many positions have been filled and the number remaining by personnel area. If current strategies are unlikely to fill remaining positions for the beginning of the 2018-19 school year, problem-solve new approaches that are likely to succeed. One approach would be to contact charter school operates to identify contract agencies they use to fill vacant positions.
- ***Expedite Hiring.*** Provide the superintendent and deputy with information on the range of days necessary to establish a start date for new personnel. If unreasonable, identify measures for shortening the process so personnel are not lost to other districts.

7. Compliance Support, and Data and Fiscal issues. Consider the following actions to improve compliance; address data issues; and enhance revenue.

a. Compliance Support. Special education department personnel, alone, cannot improve special education compliance. This requires the collaboration of principal leaders, principals, and accountability staff.

- ***Special Education and Section 504 Standard Operating Procedures Manuals.*** Expedite completion of manuals on special education and Section 504. Supplement the

documents with written expectations proposed in Recommendations 2c and 4c. Establish the two manuals as webpages that have links to more extensive information and public resources. Collaborate with stakeholders, including parents, to identify useful resources and links. Ensure staff members are available to update information regularly. Provide training to stakeholders and parents to boost their understanding of core elements of special education and Section 504, and how to use the webpages. Ensure training is accessible to parents with diverse linguistic needs and sensory limitations.

- ***Section 504 Operations.*** As part of Section 504 training, include information on students with health plans to determine whether they are eligible for Section 504 services. Also determine how current information could be used to make more appropriate eligibility determinations. In addition, ensure that students having a health plan are also reviewed for the need for Section 504 safeguards.
- ***Professional Learning.*** Embed in Recommendation 4b and 4d professional learning to address compliance issues most frequently related to MDE complaints, due process, and OCR complaints, e.g., procedural safeguards for suspended students, prior written notices, and IEP implementation.
- ***Dispute Resolution.*** Expect that every principal and their respective principal leaders will collaborate with the cohort administrator to resolve complaints when resolution is within the principal's control.
- ***IEP System Changes.*** Establish a process for notifying IEP system users of changes to the system so they can execute them effectively.
- ***Timely IEP Meetings.*** Develop a plan for holding timely IEP team meetings, including–
  - ***Master Schedule.*** Having each school develop a master schedule for 2018-19 that would forecast annual IEP meetings and triennial evaluations/IEP meetings held throughout the school year rather than during only a few months. To do so, schedule triennial and annual IEP meetings earlier than usual to ensure a less concentrated yearly schedule.
  - ***Vacant Special Educator Positions.*** Develop a protocol for principals on developing IEPs and how to include a special educator when the position is not filled by a certified person.
  - ***Supporting Case Managers.*** Develop a protocol for case managers on facilitating participation of IEP team members, and free up case managers to attend meetings.

b. Fiscal Issues. Pursue the following activities to enhance revenue and shift more funds to activities that would boost high-quality education in inclusive and separate classes.

- ***Charter Schools.*** Join with other school districts to use data like that highlighted in this report to bring attention to the legislature the inequitable funding of special education for school districts compared to charters. As part of the district's data collection for this purpose, track students returning to DPSCD from charters, the reasons for their return, and a comparison of IEP services provided by charters and those deemed appropriate by DPSCD.

- ***Center School Budgets.*** Immediately, have DPSCD's senior special education executive director, relevant fiscal, human resources, purchasing personnel, and center school principals meet (with Wayne RESA personnel if helpful) to resolve the purchasing and hiring issues center school principals face when trying to execute their approved Wayne RESA budgets in a timely manner. Have DPSCD personnel share with the deputy superintendent the steps that will be taken and how they will periodically report the status of those steps.
- ***Vendor System.*** Expedite approval of vender numbers for outside providers or evaluators when necessary to provide compensatory services.
- ***Transportation.*** Develop a protocol to guide decision-making for transportation services. See Recommendation 4b.
- ***Medicaid Reimbursement.*** Develop an RFP for Medicaid software to enable DPSCD personnel to easily document electronically service provision for *all* Medicaid-eligible students. Cast a wide net to find the most user-friendly software that will migrate data from and to the district's IEP system. The Council can help identify software used in other districts. This process should enable special education personnel to have valuable information on all students receiving services, provide for retroactive billing for students newly found to be Medicaid eligible, and support the submission of Medicaid claims.

c. Data Collection and Reporting. In addition to Recommendations 1f, 2e, and 4e –

- ***Timely IEPs.*** Develop user-friendly reports by cohort, school, and case manager on the percentage of timely IEPs each year, along with a backlog report showing students who have not received an IEP by the due date and the number of days waiting for an IEP. Have the report available electronically for lead principals, principals, and cohort leaders/administrators. Sort percentages and backlogged IEPs by school, so principals and cohort leaders can quickly identify schools in need. Have cohort leaders work with fellow administrators to identify personnel who can be temporarily deployed to neighboring schools to handle overdue IEPs and evaluations and those that are about to be overdue.
- ***Early Childhood SPP 7 Indicator.*** Ensure that data are entered correctly on early childhood SPP Indicator 7--the numbers of students entering the program below expectation and substantially increased developmentally upon exiting, and numbers meeting age expectations by the time they exit.
- ***Data Reports.*** Have staff who are expert in data reporting review the types of data and charts produced in this report, how these and other relevant information can be reported by school and cohort levels. Determine the extent to which the district's current IEP or other data system can provide similar data. DPSCD should be able to produce such reports without relying on Wayne RESA.
- ***IEP System.*** Have the district review IEP systems available in the market place to compare their current system on whether they are sufficiently advanced in terms of usability, data reporting, ability to migrate with the student information system, and potential migration of current data into a new system. Use this information to determine if the benefits of a new system outweigh keeping the current system.

d. Monitoring and Accountability. In addition to Recommendations 1g, 2f, and 4f--

- ***Strategic Plan.*** Ensure that the district's monitoring of its strategic plan includes indicators on students with IEPs, and that improvement activities take into account evidence-based practices that could inform systemic and school-based improvements.
- ***Student Growth.*** Ensure that metrics tracking student growth address the various circumstances of students with disabilities, especially those receiving instruction based on alternate standards. To the extent that the district is using NWEA data to gauge growth, have the research and assessment staff determine whether the test's growth norms allow students to make adequate progress on state standards.
- ***Accountability Protocol.*** Establish protocols or procedures for resolving disagreements between school personnel and special education personnel. Components should include but not be limited to procedures on school suspensions, the timely entry of transportation data, exiting students, facilitating transfers and new transportation routes, implementing IEPs, securing lead teachers, etc.
- ***Performance Evaluations.*** Embed in performance evaluations relevant indicators on each personnel area's role in carrying out core special education activities under their control.

8. Internal Project Manager. Have a project manager assigned to the superintendent report regularly on progress in implementing leadership's plans and initiatives, including following up recommendations in this report. Have the project manager report on relevant data, the status of implementation, and barriers to execution that require interdepartmental collaboration, and the need for adjustments to the plan.

APPENDICES

Appendix A. Incidence Rate and Staffing Ratios

The Urban Special Education Leadership Collaborative and the Council of the Great City Schools, including its team members who have conducted special education reviews, collected the data reported in these tables. *The data do not give precise comparisons, so the results need to be used with caution.* District data are not consistently reported (e.g., some districts include contractual personnel and others may exclude them) and the numbers are sometimes affected by varying placement types used by a school district. The data may count all students with IEPs, including those placed in charters, agencies, and nonpublic schools. Still, these data are the best available and are useful as a rough guide to staffing ratios.

Incidence of Students with IEPS and Personnel Staffing Ratios (May 2017)*

	Total Enrollment	Incidence		Sp Educator			Paraeducator			Speech/Lang			Psychologist		
		% SpEd	SpEd Enr	Number	Ratio To:		Number	Ratio To:		Number	Ratio To:		Number	Ratio To:	
					Sp Ed	All		Sp Ed	All		Sp Ed	All		Sp Ed	All
Agawam Public Schools	4,347	15%	656	39	17	112	100	7	44	15	44	290	3	219	1449
Atlanta Public Schools	43,443	11%	4,950	431	11	101	224	22	194	65	76	688	22	225	1975
Anchorage School Dist	48,154	14.1%	6,779	716.8	9.5	67.2	786.4	8.6	61.2	65	104	741	44.7	151	1010
Arlington VA Pub Sch	21231	13.9%	2952	343	8.6	62	262	11	81	38	77	574	22	134	923
Austin Pub S D	84676	10%	8,062	772.5	10.4	110	824	9.7	103	70.5	114	1201	34.6	233	2447
Baltimore City Publ Sch	82,824	16%	12,866	1,121	12	74	620	21	134	92	140	901	NA	NA	NA
Baltimore County P Sch	107,033	11.4%	12,127	1025.4	11.8	104	2305*	5.26	46	187.5	65	571	85.3	142	1254
Boston Public Schools	54,966	21%	11,534	1200	10	47	800	14	70	147	78	383	48	240	1173
Bellevue, WA SD	18,883	10.3%	1,947	82.7	23.5	228	118.6	16.4	159	17.4	112	1085	17.3	112.5	1092
Bridgeport, CT	20,300	14.3%	2,618	204	13	100	254	10	80	25	105	812	33	79	615
Buffalo Public Schools	46,583	16.6%	7744	753	10.3	61.9	439	17.6	106	109	71	427	62	125	751
Cambridge Publ Schools	6,000	20%	1,200	176	7	35	103	12	59	20	60	300	22	55	273
Carpentersville, IL	19,844	15.8%	3,139	227	13.8	87	380	8.3	52	43	73	461	28	112	708
Chicago Public Schools	397,092	13.7%	54,376	4,649	11.7	85.4	4,228	12.9	94	390	139	1018	261	208	1521
Cincinnati Pub Schools	51,431	17.4%	8,928	457	19.5	112.5	801	11.1	64	62	144	830	57.7	155	891
Clark Cty School Dist	309,476	10%	32,167	2,247	15	138	1,346	24	230	299	108	1036	180	179	1720
Cleve Hts-UnivHtsCty	6,000	18%	1,100	83	14	73	58	19	104	7	158	858	8	NA	NA
Cleveland Metropolitan	7,7775	20.5%	37,890	853	9.1	44.4	469	16.6	81	81.8	95	463	75	104	505
Compton CA Unified SD	26,703	11.2%	2981	126	28	256	118	25	226	5	596	5341	14	213	1907
DeKalb 428, IL	6,249	14.1%	879	58	15.2	108	205	4.3	30	9	98	694	7.5	117	833
DesMoines Public Schls	31,654	15.3%	4,854	493*	9.8	64	358.5**	13.5	88	37.3	130	849	11.5	422	2753
D.C. Public Schools	48,991	18%	8,603	669	13	74	653	14	76	90	96	545	78	111	629
Davenport Comm Sch	15,302	12%	1,857	188	10	82	287	7	54	NA	NA	NA	NA	NA	NA
Deer Valley Unified SD	36,086	9%	3,289	190	18	190	229	15	158	49	68	737	108	31	335
Denver Public Schools	78,352	12%	9,142	592	16	133	528	18	149	94	98	834	98	94	800
Detroit Public Schools	**54,378**	**16.1%**	**8,731**	**535.8**	**16**	**101**	**458**	**19**	**119**	**98**	**89**	**555**	**40**	**218**	**1359**
ESD 112	13,764	14%	1,987	55	37	251	158	13	88	20	100	689	12	166	1147
Elgin U-46, IL	40,525	13.1%	5,304	252.8	21	160	288.5	18	140	71.9	74	564	20	265	2026
Everett Pub Schools, WA	6,100	17%	1,049	74	15	83	51	21	178	4	263	1525	5	210	1220
Fort Worth	79,885	8%	6,144	520	12	154	450	14	178	73	85	1095	31	199	2577
Greenville County, SC	70,282	14%	9,894	463	21	152	376	26	187	93	106	756	25	396	2111
Houston Indepen SD	200,568	9%	17,489	1,625	11	124	1,145	16	176	158	111	1270	NA	NA	NA
Kalamazoo Pub Schools	12,100	14%	1,667	70	24	173	79	22	154	15	112	807	NA	NA	NA
Kent, WA Pub Schools	27,196	11.3%	3,069	148.7	20.6	183	318	9.7	85.5	32.3	95	842	25	123	1088
Lake Washington, WA	26,864	11.7%	3,145	155.1	20.3	111.2	241.5	13.0	111.2	32.6	96.5	824	24.7	127.3	1087.6
Kyrene School District	17,910	9%	1,544	141	11	128	124	13	145	27	58	664	14	111	1280
Lakota Local	18,500	10%	1,800	126	15	147	120	15	155	39	47	475	18	100	1021

Incidence of Students with IEPS and Personnel Staffing Ratios (May 2017)*

	Total Enrollment	Incidence		Sp Educator			Paraeducator			Speech/Lang			Psychologist		
		% SpEd	SpEd Enr	Number	Ratio To:		Number	Ratio To:		Number	Ratio To:		Number	Ratio To:	
					Sp Ed	All		Sp Ed	All		Sp Ed	All		Sp Ed	All
Los Angeles Unified SD	521,880[101]	12.69%	66,236	5307.4	12.5	98	8277.9	8.0	63	496.4	133	1051	513.5	129	1016
Lincoln	1,060	12%	128	21	7	51	21	7	51	5	26	212	2	64	530
Madison, WI Pub Schls	27,185	14.0%	3,808	347	10.9	78	448	8.5	61	86	44	316	49	77.7	555
Marlborough Pub Sch	4,835	25%	1,198	141	9	35	115	11	43	7	172	691	4	300	1209
Memphis City	110,863	15%	16,637	912	19	122	655	26	170	53	314	2092	58	287	1912
Miami-Dade	376,264	11%	40,012	2,500	17	151	1,226	33	307	209	192	1801	206	195	1827
Milwaukee	78,533	20.9%	16,406	1281	13	61	988	16.6	79	169	80	465	136	121	577
Montgomery Cty Sch	146,812	12%	17,226	1,588	11	93	1,398	13	106	293	59	502	97	178	1514
Naperville IL 203	18,031	11%	1978	150	13	120	237	8	76	33	59	549	22	90	824
Nashville	82,260	12.3%	10,141	680.5	14.9	121	594	17.1	138	109	93	755	65.5	155	1256
New Bedford	12,692	21%	2,655	204	14	63	205	13	62	26	103	489	9	295	1411
Oak Park Sch Dist 97	5,400	16%	875	78	12	70	90	10	60	14	63	386	8	110	675
N. Chicago, IL (in Dist.)	3803	16%	614	39	15.7	92	27	22.7	141	8	76.8	475.4	5	122.8	760.6
Oakland Unified SD	33312	15.4%	5401	404	13.4	82.5	175	31	190	47	115	709	43.5	125	766
Pittsburgh Pub Schools	23,276	18.1%	4,210	308	13.7	76	263	16	89	31	136	751	16	263	1455
Portland Public Schools	46,596	14%	6,513	355	19	132	535	13	88	92	71	507	56	117	833
Providence, RI	23,695	18.8%	4460	340	13	70	339	13	70	40	111	592	28	159	846
Renton, WA	14,343	14.7%	2,108	129	16.3	111	294	7	48	20	105	717	15	140	956
Rochester, NY	27,552	20%	5,472	559.2	9.8	49	428	12.8	64	148	37	186	64	85.5	430.5
Rockford IL Pub S	28,973	14%	4,065	336	12	86	334	12	87	49	83	591	24	169	1207
Round Rock	43,000	8%	3,313	369	9	117	171	20	252	41	81	1049	29	115	1483
Sacramento	46,843	13.9%	6,519	288.1	22.6	162	246.2	26.5	190	33	128	922	50.8	197.5	1419
San Diego Unified SD	132,500	12%	16,300	1,100	15	121	1,300	13	102	196	84	677	129	126	1027
Saugus, MA	3,012	15%	462	28	17	108	29	16	104	6	77	502	NA	NA	NA
Sch Dist of Philadelphia	168,181	20%	33,686	1,535	22	110	610	56	276	99	341	1699	100	337	1682
Scottsdale, AZ	26,544	10.9%	2,891	246	11.8	108	230	12.6	115	39.4	73	674	28.4	102	935
Shelby County (Memphis)	114760	12.7%	14556	852	17.1	135	768	19.0	149	55	265	2087	60	243	1913
St. Paul, MN	38,086	18.8%	7,152	523	13.7	73	536	13.3	71	97	74	392	19	376	2004
Sun Prairie Area S Dist	6,656	10%	697	62	12	108	93	8	72	14	50	476	7	100	951
Tacoma Pub Schl WA	32,412	12%	3,894	172.5	23	188	223	17	145	33.6	116	965	27	144	1200
Tucson Unified SD	56,000	14%	8,092	409	20	137	419	20	134	61	133	919	54	150	1038
Washoe County Dist, NV	63,310	14%	8,551	472	19	135	325	27	195	77	112	823	37	232	1712
Williamson Cty Schl	31,292	9%	2,824	213	13	147	400	7	78	34	121	911	23	178	1346
West Aurora, IL SD	12,725	13%	1688	120	14	106	101	17	126	21	80	606	13	130	979
Worcester, MA	24,825	21%	5,172	254	21	98	366	15	68	38	137	654	NA	NA	NA
Averages		**13.7%**			**14.4**	**105**		**15.7**	**115**		**127**	**926**		**178**	**1301**

[101] Data does not include charter schools.

Ratios for Social Workers, Nurses, OTs & PTs	Total Student Enrollment	Total Special Ed	Social Worker			Nursing (School/RN, etc.)			Occupa-tional Therapy		Physical Therapy	
			Number	Ratio To:		Number	Ratio To:		Number	Ratio	Number	Ratio
				SpEd	All		SpEd	All		SpEd		SpEd
Agawam Pub Schools	4,347	656	NA	NA	NA	8	82	544	3	219	3	219
Anchorage School Dist.	43,443	4,950	NA	NA	NA	112.8	60	426	21.9	309	7.8	869
Atlanta Public Schools	48,154	6,779	30	165	1448	58	85	511	12	413	3	1650
Arlington Pub Schools	21231	2952	15	197	1415	*30	98	708	20	147	6	492
Austin Pub S D	84676	8,062	21	384	4032	68	119	1245	19	424	13	620
Baltimore City Public	82,824	12,866	193	67	430	78	165	1062	20	644	5	2574
Baltimore County Pub Sc	107,033	12,127	48.7	249	1701	179.8	67	595	65.2	186	27	449
Bellevue, WA SD	54,966	11,534	4	487	4721	13.2	148	1431	5.3	367	5.3	367
Boston Public Schools	18,883	1,947	NA	NA	NA	100	115	563	67	172	17	680
Bridgeport, CT	20,300	2,618	38	69	534	28	94	82	7	374	2	1309
Buffalo Public Schools	46,583	7744	48.5	160	960	NA	NA	NA	75	103	29	267
Cambridge Pub School	6,000	1,200	16	75	375	0	NA	NA	16	75	7	172
Carpentersville	19,844	3,139	36.5	86	544	27.5	114	722	22	142	6	523
Chicago Pub Schools	397,092	54,376	355.7	142	1136	334	151	1210	115	440	35	1445
Cincinnati Pub Sch	51,431	8,928	NA	NA	NA	NA	NA	NA	19	470	5	1786
Clark Cty School Dist	309,476	32,167	NA	NA	NA	173	186	1789	68	474	29	1100
Cleve Hts-UnivHtsCty	6,000	1,100	7	158	858	5	220	1200	2	550	1	1100
Cleveland Metropolitan	7,7775	37,890	NA	NA	NA	69	113	549	36	216	9	864
Compton CA Unified SD	26,703	2981	1	2981	NA	1	2981	NA	1.5	1987	.5	5962
DeKalb 428, IL	6,249	879	8	110	781	7	126	893	3.4	256	1.3	204
DesMoines Public Schls	31,654	4,854	25.8	188	1227	58.4	83	542	7	693	4.8	1011
D.C. Public Schools	48,991	8,603	90	96	545	127	68	386	48	180	16	538
Davenport CommSch	15,302	1,857	NA	NA	NA	7	266	2186	NA	NA	NA	NA
Deer Valley Unified SD	36,086	3,289	NA	NA	NA	37	89	976	19	174	4	823
Denver Public Schools	78,352	9,142	74	124	1059	77	119	1018	25	366	12	762
Detroit Public Schools	**54,378**	**8,731**	**76**	**115**	**716**	**38**	**230**	**1431**	**31.6**	**276**	**10**	**873**
Elgin U-46, IL	13,764	1,987	56	95	724	59.5	89	681	25.2	210	4	1326
ESD 112	40,525	5,304	NA	NA	NA	5	398	2753	6	332	3	663
Everett Public Schools	6,100	1,049	2	525	3050	11	96	555	2	525	3	350
Fort Worth	79,885	6,144	NA	NA	NA	106	58	754	16	384	10	615
Greenville County, SC	70,282	9,894	20	495	3514	132	75	532	14	707	4	2574
Houston Indepen SD	200,568	17,489	26	673	7715	25	700	8020	17	1029	8	2187
Kalamazoo Pub	12,100	1,667	5	334	2420	2	834	6050	4	417	3	556
Kent, WA Pub Schools	27,196	3,069	2.2	NA	NA	NA	NA	NA	12.8	240	4.8	639
Kyrene School District	26,864	3,145	NA	NA	NA	4	386	4478	2	772	2	772
Lake Washington SD	17,910	1,544	NA	NA	NA	23.6	133	1138	19.3	163	3.3	953
Lakota Local	18,500	1,800	6	300	3084	14	129	1322	8	225	2	900
Los Angeles Unified SD	521,880[102]	66,236	93.9	705	5558	465	142	1122	265	265	44.5	1488
Lincoln	1,060	128	5	26	212	2	64	530	2	64	1	128
Madison, WI Public Schls	27,185	3,808	68	56	399	38	100	715	34	112	13	293
Marlborough Public	4,835	1,198	9	134	538	10	120	484	4	300	2	599
Memphis City	110,863	16,637	55	303	2016	68	245	1641	11	1513	9	1849
Miami-Dade	376,264	40,012	NA	NA	NA	206	195	1827	65	616	23	1740
Montgomery CtySch	78,533	16,406	NA	NA	NA	NA	NA	NA	112	154	61	283
Milwaukee	146,812	17,226	140	117	560	101	162	778	30	547	13	1262
Naperville, IL 203	18,031	1978	27	73	671	29	68	625	4	494	3	659
Nashville	82,260	10,141	NA	NA	NA	57	178	1443	29.5	344	6	1690
New Bedford	12,692	2,655	67	40	190	30	89	424	11	242	3	885
North Chicago, IL	5,400	875	10	61.4	380.3	NA	NA	NA	3.6	170.5	1.6	383.8
Oak Park Sch Dist 97	3803	614	12	73	450	8	110	675	7	1125	1	875
Pittsburgh Pub Sch	33312	5401	40	105	582	40.6	104	573	7	601	8	526
Oakland Unified SD	23,276	4,210	19	284	1753	30.8	175	1082	12	450	2	2701
Portland Pub Schools	46,596	6,513	10	652	4660	NA	NA	NA	20	326	9	724
Providence	23,695	4460	35	127	677	NA	NA	NA	11.5	388	4.5	991

[102] Data does not include charter schools.

Ratios for Social Workers, Nurses, OTs & PTs	Total Student Enrollment	Total Special Ed	Social Worker			Nursing (School/RN, etc.)			Occupa-tional Therapy		Physical Therapy	
			Number	Ratio To:		Number	Ratio To:		Number	Ratio	Number	Ratio
				Sped	All		SpEd	All		SpEd		SpEd
Renton, WA	14,343	2,108	0	NA	NA	17	124	844	15	141	3	703
Rockford IL Pub S	27,552	5,472	26	135	1114	32	127	905	12.5	325	4.5	903
Rochester, NY	28,973	4,065	89	61.5	30.6	55.5	98.6	496	29.2	187.4	11	497.5
Round Rock	43,000	3,313	NA	NA	NA	1	NA	NA	10	332	3	1105
Sacramento	46,843	6,519	8	NA	NA	5*	NA	NA	2	NA	0	NA
San Diego Unified SD	132,500	16,300	NA	NA	NA	129	127	1028	40	408	10	1630
Saugus, MA	3,012	462	4	116	753	5	93	603	2	231	1	462
Schl Dist of Philadelphia	168,181	33,686	NA	NA	NA	280	121	601	20	1685	20	1685
Scottsdale	26,544	2,891	NA	NA	NA	31	93	856	13.8	210	3.8	761
Shelby County (Memphis)	114760	14556	66	221	1739	79	184	1453	29.22	498	12.84	1134
St. Paul Pub Schools	38,086	7,152	92	78	414	33	217	1154	36	199	12	596
Sun Prairie Area S Dist	6,656	697	8	88	832	1	NA	NA	5	140	2	349
Tacoma Pub Sch (WA)	32,412	3,894	NA	NA	NA	1.2	NA	NA	19	205	11	354
Tucson Unified SD	56,000	8,092	26	312	2154	53	153	1057	10	810	4	2023
Washoe Cty Sc Dist	63,310	8,551	NA	NA	NA	35	248	1836	12	713	7	1222
West Aurora SD, IL	31,292	2,824	19	89	670	7	241	1818	11	154	7	241
Williamson Cty Schl	12,725	1688	NA	NA	NA	37	111	837	22	187	5	819
Worcester	24,825	5,172	NA	NA	NA	NA	NA	NA	12	431	5	1035
Averages				**295**	**2155**		**163**	**1188**		**353**		**997**

Percent Students with IEPs of Total Enrollment & Students with IEPs to Staff Ratio in Ascending Order

Rank	% IEPs	Special Educators	Paraeducators	Speech/Lang Pathologists	Psychologists	Social Workers	Nurses	Occupational Therapists	Physical Therapists
1	8%	7	4.3	26	31	26	58	64	128
2	8%	7	5.26	37	55	40	60	75	172
3	9%	8.6	6.3	44	64	56	62	103	219
4	9%	9	7	44	77.7	61	64	112	241
5	9%	9	7	47	85.5	67	67	140	283
6	9%	9.1	7	50	79	69	68	141	293
7	10%	9.5	7	58	90	73	75	142	349
8	10%	9.8	7	59	94	73	82	147	350
9	10%	9.8	8	59	100	75	83	154	354
10	10%	10	8	60	100	78	85	154	367
11	10.3%	10	8	63	102	82	89	163	384
12	11%	10	8.3	65	104	86	89	171	449
13	11%	10.3	8.5	68	110	88	89	172	462
14	11%	10.9	8.6	71	110	89	93	174	492
15	11%	11	9.7	71	111	95	93	180	498
16	11.2%	11	9.7	73	111	96	94	186	523
17	11.3%	11	10	73	112	105	96	187	526
18	11.4%	11	10	74	113	115	98	18	538
19	12%	11.4	10	74	115	116	98.6	199	556
20	12%	11.7	11	76	117	124	100	205	596
21	12%	12	11	77	121	126	104	210	599
22	12%	12	11.1	78	123	127	110	211	615
23	12%	12	12	79	124	134	111	216	620
24	12%	12	12	80	125	135	113	219	639
25	12%	12	12.6	80	127	140	114	225	659
26	12.3%	12	12.8	80	128	142	115	231	663
27	12.69%	12.5	12.9	81	129	153	119	240	676
28	12.7%	13	13	83	130	158	119	242	680
29	13%	13	13	84	134	160	120	276	703
30	13%	13	13	85	138	165	121	265	724
31	13.1%	13	13	89.1	140	188	124	285	761
32	13.7%	13	13	93	142	197	126	300	762
33	13.9%	13	13	95	144	221	127	309	772
34	14%	13.4	13	95	150	249	127	325	819
35	14%	13.7	13	96	151	284	129	326	823
36	14%	14	13	96.5	154	300	133	332	864
37	14%	14	13.5	98	155	300	142	332	869
38	14%	14	14	100	155	303	144	344	873
39	14%	14	14	103	159	312	148	366	875
40	14%	14	14	104	166	334	153	367	885
41	14%	14	15	105	169	384	155	374	900
42	14%	14	15	105	178	487	162	384	903
43	14%	14.9	15	106	178	495	163	388	953
44	14.1%	15	15	108	179	525	165	408	991
45	14.1%	15	16	111	195	652	175	413	1011
46	14.7%	15	16	111	198	673	178	417	1079
47	15%	15	16	112	199	705	184	424	1035
48	15%	15.2	16.4	112	208		186	431	1100
49	15%	15.7	16.6	112	210		195	450	1100
50	15.3%	16.0	16.6	114	213		217	470	1105
51	15.4%	16.3	17	115	218		230	473	1134
52	16%	16.3	17	116	219		220	474	1222
53	16%	17	17.1	117	223		241	477	1262
54	16%	17	17.6	121	225		245	494	1309
55	16.1%	17	18	127	232		248	498	1326
56	16.2%	17.1	18	128.3	233		266	518	1488
57	17%	18	18.4	130	240		386	525	1532
58	17.4%	19	19	133	243		398	547	1553

Rank	% IEPs	Special Educators	Paraeducators	Speech/Lang Pathologists	Psychologists	Social Workers	Nurses	Occupational Therapists	Physical Therapists
59	17.7%	19	19	135	263		700	550	1630
60	18%	19	19.1	136	265		834	601	1650
61	18%	19	20	137	287			616	1685
62	18%	19.5	20	139	295			644	1690
63	18%	20	20	140	300			693	1740
64	18.1%	20.3	21	144	319			702	1786
65	19%	20.6	21	158	337			713	1849
66	19%	21	22	172	376			772	2023
67	19.3%	21	22	192	396			810	2187
68	20%	21	24	218				1029	2574
69	20%	22	25	263				1125	2574
70	20%	22.6	26	265				1513	2701
71	20.5%	23	26	314				1685	2941
72	20.9%	23.5	27	341					
73	21%	24	31	596					
74	21%	24	33						
75	21%	37	56						
Avg.	**13.7%**	**14.4**	**15.7**	**127**	**178**	**295**	**163**	**353**	**997**

Appendix B. Data and Documents Reviewed

- CGCS Data Request
- ASD Center Program Procedures
- Catamaran Data Report Due Dates 2017-2018
- Copy of AUDIT Q#13 SE Configuration of Services
- DD Program Procedures June 2014
- Detroit Public Schools Community Schools District (B-Reports 2017)
- DPSCD Complaint Log
- Discussion Document Special Education Detail
- DPSCD - Special Education (FY 2013-2018B1)[3].
- DPSCD Center Students not at DPSCD
- DPSCD Part B 2017 Strand Report
- DPS RTI Toolkit
- DPS Special Education Handbook
- DPSCD Initiatives
- Dropout rates 2016
- DT Program Procedures June 2014
- Early Intervention Center Program Procedures June 2014
- Graduation rates 2016
- Hearing Impairment Program Procedures June 2014
  MoCI Program Procedures
- Indicator B-5 Educational Environment State Department of Michigan
- Michigan Department of Education (MDE) Annual Performance Report (2015-16)
- MDE IDEA Determination Letter (May 2017 and May 2018)
- MDE Warning Letter for LRE (May 2017 and May 2018)
- MDE Webpage: MTSS
- Monitoring Activities Report May 2017
- NAEP data (2003-15)
- Organization Chart for District
- Organization Chart for Special Education
- Parent Organizations (List of Parent Organizations and Contacts)
- Parent Training Example (Sample Autism Family Night)
- Part B Determination History Report
- POHI Program Procedures June 2014
- Principal Reports-Support (2017-18 School Organization Structure)
- Program Descriptors - Resource - LD
- RTI Handbook
- SCI Program Procedures June 2014
- Section 504 Handbook
- Special Education Budget Memo
- Special Education Placement Procedures
- State Performance Plan for DPS (2015-16)
- SXI (Severe Multiple Impairment) Center Program Procedures June 2014

- Transition Services Supporting Documentation
- VI (Visual Impairment) Center Program Procedures June 2014
- Workskills Center Program Procedures June 2014

Appendix C. Draft Working Agenda[103]

January 7, 2018	
Dinner: Council Team and Iranetta Wright, Deputy Superintendent	
January 8, 2018	
8:00 a.m.-9:00 a.m.	Michelle DeJaeger, Senior Executive Director of Office of Specialized Student Services
9:00 a.m.-10:00 a.m.	**Superintendent (rescheduled)**
10:00 a.m.-10:30 a.m.	**Senior Administrators** Luis Solano- Chief Operating Officer (HR/Talent) Alycia Meriweather, Deputy Superintendent External Partnerships, Enrollment & Innovation Jeremy Vidito, Chief Financial Officer Sharlonda Buckman- Senior Executive Director Family & Community Engag
10:30a.m.-11:15 a.m.	**Curriculum Executive Directors** April Imperio, Deputy Executive Director, Literacy Ellen Gilchrist, Deputy Executive Director, Social Studies Kristie Ford, Deputy Executive Director, Science Tony Hawk, Deputy Executive Director, Mathematics
11:15a.m.-12:15 p.m.	**Principal Leaders** Nidia Ashby, Cohort 1 Leenet Campbell-Williams, Cohort 2 Ricky Fountain, Cohort 3 Rebeca Luna, Cohort 4 Brenda Belcher, Career & Technical Centers
12:45 p.m.-1:30 p.m.	**Special Education Instruction, Compliance, and Behavior** Gina Alexander, Compliance (oversee specialist) Tammora Green, IEP Specialist Anne Gendregske, IEP Specialist Alecia Hill-Williams, IEP Specialist Tanya McClue-Clark, IEP Specialist Kristen Howard, Compliance
1:30 p.m.-2:30 p.m.	**Related Services/Program Managers K-12/Cohort Liaison** Marsha Irvin, Psychological Services Pamela Joy, Health and Physical Education Donna Payne, Speech & Language Gregory Jacoby, Audiologists & 504 Coordinator Shealah Treece, School Social Workers Justine Travick, EI Programs Richard Gregory, Act 18 POHI Tyra Butler, Supervisor Ninetta Jordan, Early Intervention Marlene Hunter-Armstrong- Occupational Therapy & Physical Therapy Supe Sally Denoyer, School Psychologist

[103] Draft agenda, participants, and times changed during the review process. This agenda is the working document that the team used at the beginning of the process, but not all sessions were held at the times scheduled and some individuals on the agenda were not able to attend.

	Trina Mason, School Social Worker Michelle Johnson, Occupational Therapist Dan'elle Nelson, Speech Therapist/Assistive Technology Training Informatio Center (ATTIC) Chris Skoglund & Derrick Graves, Assistive Technology Training Informatio Center (ATTIC)
2:30 p.m.-3:15 p.m.	**Intervention Specialist, Homeless and Climate and Culture, Title IX** Tonya Nelson, Williams, Behavior Specialist Dwight Jones, Executive Director, School Climate and Culture Thomas Mason, Attendance Agent Faith Groves, Attendance Agent Stephen, Bland, Attendance Agent
3:30 p.m.-4:30p.m.	**General Education Teachers** Alycia Jenrette - Breithaupt Dorian Roberts, Bagley Elem George Reece - EEVPA Gregory Edwards, Golightly Janeen Montgomery, Noble Lauren Bayles, CMA HS Lorna Skocelas, Bennett Mark Ragis, Clippert Marla Williams, Burns Penelope Johnson, Hutchinson Quan Neloms - FDA Rosheen Travis, Edison Elem Sandy Carothers, Mackenzie Simona Pentecost, Greenfield Union Sylvia Johnson, Bow Syndeara Jackson, Schulze Elementary Tammy Porter, Blackwell Tiffany Anderson, Neinas
4:30 p.m.-5:30p.m.	**Special Education Teachers** Avvonne Manning, Munger Caroline Anyanetu, Carstens Carrie Igwe, Moses Field Deborah Perry, Cody Inst. Technology Dee Savage, Henderson Diamond Johnson, Detroit International Academy Doreen Odem, Priest Evelyn Madu, DCP Felicia Whitted, Diann Banks Jeanette Pettaway, Cass Tech Josephine Mejai, Keidan Julie Julien, Bunche Karla Jackson, Munger Melanie Hughes, East English Village Valerie Sanders, Fisher Lower
5:30 p.m.-6:30p.m.	**Parents, Advocates and Community Partners** Joann Goree, Wayne County Parent Advisory Committee, RESA Daryl Williams

	Tatiana Clayton Cornella Johnson Desiree Foster Latoya Williams Shantonia Neal Kristy Murphy
6:30- 8:00 p.m.	**Meeting and dinner with Superintendent Vitti**
January 9, 2018	
7:45a.m.-8:30a.m	**Office of Charter Schools (District approved charters)** Dr. Jendayi Gardner, Senior Deputy Executive Director of Charter Schools Sean Townsin, Principal, Escuela Avancemos Academy Lindsie Boykin, Principal, MacDowell Prep Academy Cha-Ronda Edgerson, Principal, Timbuktu Academy
8:30 a.m.-9:00 a.m.	**Michigan Department of Education or (RESA)** Patti Silveri, Special Education Administrator Chris McEvoy, Special Education Administrator Karen Howey, Executive Director, Special Education & Early Intervention Se
9:00 a.m.-9:45 a.m.	**Bilingual Education** Juan Patiño, Parent Engagement Tina Villareal-Hernández, Translation Coordinator Joseph Schwartz, Data Analyst/WIDA
9:45 a.m.-10:45 a.m.	**Transportation, Finance, Talent** Aaron Walter, Executive Director Cassandra Washington, Executive Director, Division of Human Resources Nicole Erb, Talent Program Supervisor Brianna Watson, Talent Manager Jeremy Vidito, Chief Financial Officer Michael Romanowski, Program Director, SPED Finance Charles Bruce, Director, Office of Title I & Section 31a Aaron Walter, Assistant Director (Transportation) Felicia Venable, Senior Executive Director (Facilities)
10:45 a.m.-11:15 a.m.	**Enrollment** _Debbie Louis-Ake, Placement Supervisor
11:15 a.m.-NOON	**Union** Ivy Bailey, DFT, President Terrence Martin, DFT, Executive Vice President Marcus Walton, DFT, Executive Board Member Debbie Louis-Ake, OSAS, President
12:30 p.m.-1 p.m.	**Legal** Jenice Mitchell Ford, Lead Counsel Phyllis Hurks-Hill-Senior Legal Counsel Marquita Sylvia Rebecca Shaw Hicks
1:00 p.m.-1:45 p.m.	Eleanor Harris, Former SPED Director for Michigan Department of Educatio
1:45 p.m.-2:15 p.m.	**Preschool Leaders** Anita Totty, Director of Foundation for Early Learners Ninetta Jordan, Early Intervention Paulette White, Preschool, SPED
2:30 p.m.-3:30 p.m.	*Center School Principals* Robert Avedisian, Charles R. Drew Transition Center

	Krista McKinney, Randolph Career Tech Center Letanya Dandridge, Moses Field Roslyn Fluker, Diann Banks-Williamson Educational Center Renee Kraus, Turning point Academy at Fleming
3:45p.m.–4:45p.m.	**K-8 Principals** Nicholas Brown, Academy of the Americas Alisanda Woods, Bethune Elementary Darhonda Evans, Bow Laura Jawor, Charles Wright Academy of Arts and Science Wendy Shirley, Chrysler Elementary Melissa Scott, Coleman A. Young Kurtis Brown, Dossin Elementary/Middle School Latoyia Webb-Harris, Durfee Elementary/Middle School Donnell Burroughs, Munger Elementary/Middle School Desheil Echols, Pulaski Elementary/Middle School Maria Hernandez-Martinez, Roberto Clemente
4:45p.m.-5:45p.m.	**High School Principals** Charles Todd, Benjamin Carson High School/Crockett CTC Johnathon Matthews, Cody Academy of Public Leadership Neal Morrison, Davis Aerospace/Golightly CTC Tanisha Manningham, Denby High School Pamela Askew, Detroit international Academy for Young Women Delois Spryszak, Detroit School of Arts Michael Mokdad, Henry Ford High School Pashawn Johnson, Osborn High School Shirley Brown, Pershing High School Krista McKinney, Randolph Career Tech Center Anita Williams, Renaissance High School Latoya Hall-King, Cody DIT
January 10, 2018	
12:45p.m.-2:15p.m.	Debriefing with **Superintendent/Deputy of Schools**

January 16, 2017 **Paraprofessional** teleconference**:** Drew: LC Bulger; Sandra Lewis; Deborah Oates; Linzell Rice; Tonya Rice Early Intervention Diagnostic Center: Yvette Ayer. Chrysler (Elementary): Brittany Wilborn Westside Academy (High School): Betty Ross

Appendix D. Focus Group Participants[104]

- Iranetta Wright
- Michelle DeJaeger
- Jeremy Vidito
- Alycia Meriweather
- Luis Solano
- Beth Gonzalez
- April Imperio
- Ellen Gilchrist
- Kristie Ford
- Tony Hawk
- Nidia Ashby
- Leenet Campbell-Williams
- Ricky Fountain
- Rebeca Luna
- Brenda Belcher
- Gina Alexander
- Tammora Green
- Anne Gendregske
- Alecia Hill-Willims
- Tanya McClue-Clark
- Kristen Howard
- Marsha Irvin
- Anita Totty
- Ninetta Jordan
- Paulette White
- Pamela Joy
- Donna Payne
- Gregory Jacoby
- Shealah Treece
- Justine Travick
- Richard Gregory
- Tyra Butler
- Marlene Hunter-Armstrong
- Sally Denoyer
- Trina Mason
- Michelle Johnson
- Dan'elle Nelson
- Chris Skoglund

[104] This list was developed from sign-in sheets at each interview session. Not all signatures were legible and the result may be names that are misspelled on this list.

- Derrick Graves
- George Eason
- Tonya Nelson
- Thomas Mason
- Faith Groves
- Stephen Bland
- Alycia Jenrette
- Dorian Roberts
- George Reece
- Gregory Edwards
- Janeen Montgomery
- Lauren Bayles
- Lorna Skocelas,
- Mark Ragis
- Marla Williams
- Penelope Johnson
- Rosheena Travis
- Sandy Carothers
- Simona Pentecost,
- Sylvia Johnson
- Syndeara Jackson
- Tammy Porter
- Tiffany Anderson
- Avvonne Manning
- Caroline Anyanetu
- Carrie Igwe
- Deborah Perry
- Dee Savage
- Diamond Johnson
- Doreen Odem
- Evelyn Madu,
- Felicia Whitted
- Jeanette Pettaway
- Josephine Mejai
- Julie Julien
- Karla Jackson
- Melanie Hughes
- Valerie Sanders
- Daryl Williams
- Tatiana Clayton
- Dorothea Nicholson
- Greg Harris
- Latoya Williams
- Shantonia Neal

- Kristy Murphy
- Superintendent Nikolai Vitti
- Dr. Jendayi Gardner
- Sean Townsin
- Lindsie Boykin
- Cha-Ronda Edgerson
- Patti Silveri
- Chris McEvoy
- Karen Howey
- Juan Patiño
- Tina Villareal-Hernández
- Joseph Schwartz
- Aaron Walter
- Cassandra Washington
- Nicole Erb
- Brianna Watson
- Jeremy Vidito
- Michael Romanowski
- Charles Bruce
- Aaron Walter
- Felicia Venable
- Debbie Louis-Ake
- Ivy Bailey
- Terrence Martin
- Marcus Walton
- Deborah Louis-Ake
- Jenice Mitchell Ford
- Phyllis Hurks-Hill
- Marquita Sylvia
- Rebecca Shaw Hicks
- Eleanor Harris
- Roquesha O'Neal
- Shroniqus Kemp
- Tia Ervin
- T. Larkins
- Nealmetria Lopez
- Justin Payne
- Charldine Q. Bowens
- Joann Goree
- Aulga Caudle
- D.R.
- Verna Brocks
- Paulette White
- Robert Avedisian

- Krista McKinney-King
- Letanya Dandridge
- Roslyn Fluker
- Renee Kraus
- Jerry L. White
- Gary Daylor
- L. Young
- L. Cary
- Darhonda Evans
- Alisanda Woods
- Laura Jawor
- Wendy Shirley
- Melissa Scott
- Kurtis Brown
- Latoyia Webb-Harris
- Donnell Burroughs
- Desheil Echols
- Maria Hernandez-Martinez
- Nicholas Brown
- Neal Morrison
- Charles Todd
- Johnathon Matthews
- Neal Morrison
- Tanisha Manningham
- Pamela Askew
- Delois Spryszak
- Michael Mokdad
- Pashawn Johnson
- Shirley Brown
- Latoya Hall-King
- Krista McKinney
- Anita Williams
- Drew: LC Bulger
- Sandra Lewis
- Deborah Oates
- Linzell Rice
- Tonya Rice
- Yvette Ayer

Appendix E. Strategic Support Team

The following were members of the Council's Strategic Support Team on special education who conducted this project for the Sacramento Unified School District.

Sue Gamm, Esq.

Sue Gamm, Esq., is a special educator and attorney who has spent more than 40 years specializing in the study and understanding of evidence-based practices, policies, and procedures that support a systemic and effective education of students with disabilities and those with academic and social/emotional challenges. Ms. Gamm has blended her unique legal and special education programmatic expertise with her experiences as the chief specialized services officer for the Chicago Public Schools, attorney and division director for the Office for Civil Rights (US Department of Education) and special educator to become a highly regarded national expert as an author, consultant, presenter, and evaluator. Since her retirement from the Chicago Public Schools in 2003, has been engaged in 30 states and the District of Columbia with more than 50 school districts and five state educational agencies working to improve the instruction and support provided to students with disabilities. Twenty-one of these reviews were conducted through the auspices of the Council of the Great City Schools. Ms. Gamm has written standard operating procedure manuals for special education practices and multi-tiered systems of support (MTSS) for more than 10 school districts, and has shared her knowledge of the IDEA, Section 504 of the Rehabilitation Act, the Americans with Disabilities Act and related issues at more than 70 national, state and local conferences. Ms. Gamm has authored/co-authored numerous periodicals and publications, including those focused on MTSS, disproportionality for special education, responding to OCR investigations, and assessment. She also testified before Congressional and Illinois legislative committees. Ms. Gamm has served as a consulting attorney on several of the Council's *amicus* briefs focusing on special education that were submitted to the U.S. Supreme Court. Further, she consults with the Public Consulting Group and numerous school districts and state educational agencies and provides training at national, state, and local conferences on special education matters, particularly in the area of special education disproportionality. Ms. Gamm has also been recognized for her legal expertise in the area of special education through her engagement as an expert witness or consultant involving nine special education federal class action or systemic cases. She is admitted to practice before the Illinois Bar, the Federal Bar, and the U.S. Supreme Court Bar.

Julie Wright Halbert, Esq.

Julie Halbert has been legislative counsel for the Council of the Great City Schools for over 22 years. In that capacity, she has served as a national education legal and policy specialist, with emphasis on special education. She worked extensively on the reauthorizations of the Individuals with Disabilities Education Act (IDEA) in 1997 and 2004. Ms. Halbert is responsible for drafting numerous technical provisions to the IDEA and providing technical assistance to Congress and the U. S. Department of Education. In 1997 and again in 2005, she testified before the U.S. Department of Education on its proposed regulations on IDEA 2004. Ms. Halbert has directed each of the Council's special education strategic review teams, including special education reviews in the Anchorage, Austin, Boston, Chicago, Charleston, Cincinnati, Des Moines, District of Columbia, Guilford County (NC), Memphis, New York City, Richmond, Philadelphia, Pittsburgh, Providence and St. Louis. Working with national experts Sue Gamm and Judy Elliott, she has

published a Council national white paper on the implementation and development of MTSS, Multi-Tiered Systems of Supports for our nation's urban school districts. Ms. Halbert most recently, January 2017, took the lead working with our cities in the development of the Council's amicus brief to the Supreme Court of the United States in *Endrews v. Douglas County School* District, on determining the educational benefit standard due by our districts to students with disabilities when implementing their IEPS. This case is certain to be one of the most important cases since *Rowley* decided over thirty years ago. She was also the counsel of record for the Council of the Great City Schools' *amicus* briefs in the Supreme Court of the United States in (a) B*oard of Education of the City School District of the City of New York v. Tom F., On Behalf of Gilbert F., A Minor Child* (2007); (b) Jacob *Winkelman, a Minor By and Through His Parents and Legal Guardians, Jeff and Sander Winkelman, et al., v. Parma City School District* (2007*)*; (c) *Brian Schaffer v. Jerry Weast, Superintendent of Montgomery County Public Schools, et al.,* (2005); (d) *Parents Involved in Community Schools v. Seattle School District,* and *Meredith v. Jefferson County Board of Education* (2007) and *Forest Grove School District v. T.A*, (2009). Ms. Halbert graduated with honors from the University of Maryland and the University of Miami School of Law. She is admitted to practice in the Federal Bar, the U.S. Supreme Court Bar, and the Florida and Pennsylvania Bars. Additionally, for the past year, together with Husch Blackwell partner John Borkowski, Ms. Halbert is assisting to develop and implement national legal webinars for urban district's counsel and key staff on emerging legal issues for the Council's districts. They include, Civil Rights Priorities at the End of One Administration and Beginning of Another, Hate Speech, Micro-aggressions and Student First Amendment Rights,

Judy Elliot, Ph.D.

Judy Elliott is formerly the Chief Academic Officer of the Los Angeles Unified School District where she was responsible for curriculum and instruction Early Childhood through adult, professional development, innovation, accountability, assessment afterschool programs, state and federal programs, health and human services, magnet program, language acquisition for both English and Standard English learners, parent outreach, and intervention programs for all students. Before that she was the Chief of Teaching and Learning in the Portland Oregon Public Schools and prior to that an Assistant Superintendent of Long Beach Unified School District in CA. Judy also was a Senior Researcher at the National Center on Educational Outcomes at the University of Minnesota. She started her career as a classroom teacher and then school psychologist. Judy continues to assist districts, national organizations, state and federal departments of education in their efforts to update and realign curriculum frameworks, instruction, and assessment, and accountability that include all students. Most recently she was appointed by the Education Commissioner of New York State to be the Distinguished Educator for the Buffalo City School District. Her research interests focus on systems change and reform, effective instruction for all students, and data-based decision making for accountability and accelerated student achievement. She has trained thousands of staff, teachers, and administrators in the U.S. and abroad in areas of integrated service delivery systems, leadership, effective use of data, inclusive schooling that include linking assessment to classroom intervention, strategies and tactics for effective instruction, curriculum adaptation, collaborative teaching and behavior management. She has published over 51 articles, book chapters, technical/research reports and books. She sits on editorial boards for professional journals and is active in many professional organizations. She is nationally known for her work in Response to Instruction and Intervention and has led many successful initiatives and projects around that effort.

Gregory Roberson, Ed.D

Upon graduation from high school, Dr. Gregory Roberson enlisted in the United States Air Force where he served for 22 years before retiring in 2003 as a Senior Master Sergeant. He spent 11 years overseas while serving his country, and his last deployment was in September 2001 after the attacks of 9/11 as a member of Central Air Forces Combat Operations team for Operation Enduring Freedom. In preparation for retirement and transition into the civilian world, he utilized the troops to teachers program to earn his special education teaching credentials at Xavier University in Cincinnati, Ohio. Dr. Roberson was an intervention specialist before leaving the classroom at his superintendent's request to become an administrator. He rose through the ranks from special education coordinator, director, and then a student services executive director. Dr. Roberson has experience in all areas of special education, gifted, ELL, and related services. His work in reducing expulsion rates while serving as the district's expulsion officer is especially noteworthy. Dr. Roberson is currently the exceptional children chief officer Dayton Public Schools where he oversees one of the largest departments in the district and a $40 million budget. His research interests are in the areas of co-teaching, creating inclusive schools, and social emotional supports for students with severe behavioral disorders.

Appendix F. About the Council and History of Strategic Support Teams

The Council of the Great City Schools is a coalition of 70 of the nation's largest urban public-school systems. [105] The organization's Board of Directors is composed of the superintendent, CEO, or chancellor of schools and one school board member from each member city. An executive committee of 24 individuals, equally divided in number between superintendents and school board members, provides regular oversight of the 501(c)(3) organization. The composition of the organization makes it the only independent national group representing the governing and administrative leadership of urban education and the only association whose sole purpose revolves around urban schooling.

The mission of the Council is to advocate for urban public education and to assist its members in to improve and reform. The Council provides services to its members in the areas of legislation, research, communications, curriculum and instruction, and management. The group also convenes two major conferences each year; conducts studies of urban school conditions and trends; and operates ongoing networks of senior school district managers with responsibilities for areas such as federal programs, operations, finance, personnel, communications, instruction, research, and technology. Finally, the organization informs the nation's policymakers, the media, and the public of the successes and challenges of schools in the nation's Great Cities. Urban school leaders from across the country use the organization as a source of information and an umbrella for their joint activities and concerns.

The Council was founded in 1956 and incorporated in 1961 and has its headquarters in Washington, DC. Since the organization's founding, geographic, ethnic, language, and cultural diversity has typified the Council's membership and staff.

[105] Albuquerque, Anchorage, Atlanta, Austin, Baltimore, Birmingham, Boston, Broward County (Ft. Lauderdale), Buffalo, Caddo Parish (Shreveport), Charleston County, Charlotte-Mecklenburg, Chicago, Buffalo, Clark County (Las Vegas), Cleveland, Columbus, Dallas, Dayton, Denver, Des Moines, Detroit, Duval County (Jacksonville), East Baton Rouge, Fort Worth, Fresno, Guilford County (Greensboro, N.C.), Hillsborough County (Tampa), Houston, Indianapolis, Jackson, Jefferson County (Louisville), Kansas City, Little Rock School District, Long Beach, Los Angeles, Memphis, Miami-Dade County, Milwaukee, Minneapolis, Nashville, Newark, New Orleans, New York City, Norfolk, Sacramento, Oklahoma City, Omaha, Orange County (Orlando), Palm Beach County, Philadelphia, Pittsburgh, Portland, Providence, Richmond, Rochester, Sacramento, Salt Lake City, San Diego, San Francisco, Seattle, St. Louis, St. Paul, Toledo, Washington, D.C., and Wichita

History of Strategic Support Teams of the Council of the Great City Schools

The following is a history of the Strategic Support Teams provided by the Council of the Great City Schools to its member urban school districts over the last 18 years.

City	Area	Year
Albuquerque		
	Facilities and Roofing	2003
	Human Resources	2003
	Information Technology	2003
	Special Education	2005
	Legal Services	2005
	Safety and Security	2007
	Research	2013
	Human Resources	2016
Anchorage		
	Finance	2004
	Communications	2008
	Math Instruction	2010
	Food Services	2011
	Organizational Structure	2012
	Facilities Operations	2015
	Special Education	2015
	Human Resources	2016
Atlanta		
	Facilities	2009
	Transportation	2010
Austin		
	Special Education	2010
Baltimore		
	Information Technology	2011
Birmingham		
	Organizational Structure	2007
	Operations	2008
	Facilities	2010
	Human Resources	2014
	Financial Operations	2015
Boston		
	Special Education	2009
	Curriculum & Instruction	2014
	Food Service	2014
	Facilities	2016
Bridgeport		
	Transportation	2012
Broward County (FL)		
	Information Technology	2000

	Food Services	2009
	Transportation	2009
	Information Technology	2012
	Information Technology	2018
Buffalo		
	Superintendent Support	2000
	Organizational Structure	2000
	Curriculum and Instruction	2000
	Personnel	2000
	Facilities and Operations	2000
	Communications	2000
	Finance	2000
	Finance II	2003
	Bilingual Education	2009
	Special Education	2014
Caddo Parish (LA)		
	Facilities	2004
Charleston		
	Special Education	2005
	Transportation	2014
Charlotte-Mecklenburg		
	Human Resources	2007
	Organizational Structure	2012
	Transportation	2013
Cincinnati		
	Curriculum and Instruction	2004
	Curriculum and Instruction	2009
	Special Education	2013
Chicago		
	Warehouse Operations	2010
	Special Education I	2011
	Special Education II	2012
	Bilingual Education	2014
Christina (DE)		
	Curriculum and Instruction	2007
Cleveland		
	Student Assignments	1999, 2000
	Transportation	2000
	Safety and Security	2000
	Facilities Financing	2000
	Facilities Operations	2000
	Transportation	2004
	Curriculum and Instruction	2005
	Safety and Security	2007
	Safety and Security	2008

	Theme Schools	2009
	Special Education	2017
Columbus		
	Superintendent Support	2001
	Human Resources	2001
	Facilities Financing	2002
	Finance and Treasury	2003
	Budget	2003
	Curriculum and Instruction	2005
	Information Technology	2007
	Food Services	2007
	Transportation	2009
Dallas		
	Procurement	2007
	Staffing Levels	2009
	Staffing Levels	2016
Dayton		
	Superintendent Support	2001
	Curriculum and Instruction	2001
	Finance	2001
	Communications	2002
	Curriculum and Instruction	2005
	Budget	2005
	Curriculum and Instruction	2008
	Organizational Structure	2017
Denver		
	Superintendent Support	2001
	Personnel	2001
	Curriculum and Instruction	2005
	Bilingual Education	2006
	Curriculum and Instruction	2008
	Common Core Implementation	2014
Des Moines		
	Budget and Finance	2003
	Staffing Levels	2012
	Human Resources	2012
	Special Education	2015
	Bilingual Education	2015
Detroit		
	Curriculum and Instruction	2002
	Assessment	2002
	Communications	2002
	Curriculum and Assessment	2003
	Communications	2003
	Textbook Procurement	2004

	Food Services	2007
	Curriculum and Instruction	2008
	Facilities	2008
	Finance and Budget	2008
	Information Technology	2008
	Stimulus planning	2009
	Human Resources	2009
	Special Education	2018
Fresno		
	Curriculum and Instruction	2012
	Special Education	2018
Guilford County		
	Bilingual Education	2002
	Information Technology	2003
	Special Education	2003
	Facilities	2004
	Human Resources	2007
	Transportation	2017
Hillsborough County		
	Transportation	2005
	Procurement	2005
	Special Education	2012
	Transportation	2015
Houston		
	Facilities Operations	2010
	Capitol Program	2010
	Information Technology	2011
	Procurement	2011
Indianapolis		
	Transportation	2007
	Information Technology	2010
	Finance and Budget	2013
Jackson (MS)		
	Bond Referendum	2006
	Communications	2009
	Curriculum and Instruction	2017
Jacksonville		
	Organization and Management	2002
	Operations	2002
	Human Resources	2002
	Finance	2002
	Information Technology	2002
	Finance	2006
	Facilities operations	2015
	Budget and finance	2015

Kansas City		
	Human Resources	2005
	Information Technology	2005
	Finance	2005
	Operations	2005
	Purchasing	2006
	Curriculum and Instruction	2006
	Program Implementation	2007
	Stimulus Planning	2009
	Human Resources	2016
	Transportation	2016
	Finance	2016
	Facilities	2016
	Curriculum and Instruction	2016
Little Rock		
	Curriculum and Instruction	2010
Los Angeles		
	Budget and Finance	2002
	Organizational Structure	2005
	Finance	2005
	Information Technology	2005
	Human Resources	2005
	Business Services	2005
Louisville		
	Management Information	2005
	Staffing Levels	2009
	Organizational Structure	2018
Memphis		
	Information Technology	2007
	Special Education	2015
	Food Services	2016
	Procurement	2016
Miami-Dade County		
	Construction Management	2003
	Food Services	2009
	Transportation	2009
	Maintenance & Operations	2009
	Capital Projects	2009
	Information Technology	2013
Milwaukee		
	Research and Testing	1999
	Safety and Security	2000
	School Board Support	1999
	Curriculum and Instruction	2006
	Alternative Education	2007

	Human Resources	2009
	Human Resources	2013
	Information Technology	2013
Minneapolis		
	Curriculum and Instruction	2004
	Finance	2004
	Federal Programs	2004
	Transportation	2016
	Organizational Structure	2016
Nashville		
	Food Service	2010
	Bilingual Education	2014
	Curriculum and Instruction	2016
Newark		
	Curriculum and Instruction	2007
	Food Service	2008
New Orleans		
	Personnel	2001
	Transportation	2002
	Information Technology	2003
	Hurricane Damage Assessment	2005
	Curriculum and Instruction	2006
New York City		
	Special Education	2008
Norfolk		
	Testing and Assessment	2003
	Curriculum and Instruction	2012
	Transportation	2018
	Finance	2018
	Facilities Operations	2018
Omaha		
	Buildings and Grounds Operations	2015
	Transportation	2016
Orange County		
	Information Technology	2010
Palm Beach County		
	Transportation	2015
	Safety & Security	2018
Philadelphia		
	Curriculum and Instruction	2003
	Federal Programs	2003
	Food Service	2003
	Facilities	2003
	Transportation	2003
	Human Resources	2004

	Budget	2008
	Human Resource	2009
	Special Education	2009
	Transportation	2014
Pittsburgh		
	Curriculum and Instruction	2005
	Technology	2006
	Finance	2006
	Special Education	2009
	Organizational Structure	2016
	Business Services and Finance	2016
	Curriculum and Instruction	2016
	Research	2016
	Human Resources	2018
	Information Technology	2018
	Facilities Operations	2018
Portland		
	Finance and Budget	2010
	Procurement	2010
	Operations	2010
Prince George's County		
	Transportation	2012
Providence		
	Business Operations	2001
	MIS and Technology	2001
	Personnel	2001
	Human Resources	2007
	Special Education	2011
	Bilingual Education	2011
Puerto Rico		
	Hurricane Damage Assessment	2017
Reno		
	Facilities Management	2013
	Food Services	2013
	Purchasing	2013
	School Police	2013
	Transportation	2013
	Information Technology	2013
Richmond		
	Transportation	2003
	Curriculum and Instruction	2003
	Federal Programs	2003
	Special Education	2003
	Human Resources	2014
	Financial Operations	2018

Rochester		
	Finance and Technology	2003
	Transportation	2004
	Food Services	2004
	Special Education	2008
Sacramento		
	Special Education	2016
San Antonio		
	Facilities Operations	2017
	IT Operations	2017
	Transportation	2017
	Food Services	2017
	Human Resource	2018
San Diego		
	Finance	2006
	Food Service	2006
	Transportation	2007
	Procurement	2007
San Francisco		
	Technology	2001
St. Louis		
	Special Education	2003
	Curriculum and Instruction	2004
	Federal Programs	2004
	Textbook Procurement	2004
	Human Resources	2005
St. Paul		
	Special Education	2011
	Transportation	2011
	Organizational Structure	2017
Seattle		
	Human Resources	2008
	Budget and Finance	2008
	Information Technology	2008
	Bilingual Education	2008
	Transportation	2008
	Capital Projects	2008
	Maintenance and Operations	2008
	Procurement	2008
	Food Services	2008
	Capital Projects	2013
Toledo		
	Curriculum and Instruction	2005
Washington, D.C.		
	Finance and Procurement	1998

	Personnel	1998
	Communications	1998
	Transportation	1998
	Facilities Management	1998
	Special Education	1998
	Legal and General Counsel	1998
	MIS and Technology	1998
	Curriculum and Instruction	2003
	Budget and Finance	2005
	Transportation	2005
	Curriculum and Instruction	2007
	Common Core Implementation	2011
Wichita		
	Transportation	2009
	Information Technology	2017