

August 11, 2016

Dear Members of the Board and Dr. McGee:

On behalf of the Palo Alto Community Advisory Committee for Special Education (CAC), we wish to express our concerns about the budget report presented to the Board for discussion.

First, it was a surprise to read in the budget report that, while the staff searches for ways to make budget cuts in 2017-18, staff already believes they can “examine the delivery of special education services and will likely find cuts there”. Further the staff indicated that Dr. Hehir and his team “made a compelling case for making the transition from co-teaching to Universal Design for Learning, which has proven more effective and fits with our inclusive philosophy.” Where did Dr. Hehir make this case?

The preliminary report presented at the June 13th Board retreat included a brief three paragraph recommendation [*Recommendation 3: Consider building capacity to provide Universally Designed curriculum and instruction to all students, page 3*]. In our opinion, this does not meet the standard of compelling or comprehensive.

At the June 13th retreat we were told that the full Dr. Hehir report would be released in about six weeks. More than eight weeks has passed since then and our community has not received the final Report of the Review of Special Education in PAUSD. We respectfully request the Report and a revised timetable of deliverables be made public and discussed, before any decisions are made based on its recommendations.

Second, we should be clear that UDL is an approach that impacts long-term capacity for diverse student learners by making near-term investments in teacher training and modern technology, and not a method for short-term cost savings. UDL will resonate favorably with those interested in fostering 21st century learners and can be positioned as such, but In fact, there are high implementation costs with the UDL model including possibly a coach to help:

1. Plan, research, design, and develop the general education curriculum [for students with and without special needs]
2. [Develop] parallel versions of approved modifications, adaptations and alternative materials...for classroom and individual use
3. Purchase and maintain modern technology - for schools that lack adequate technology – to support UDL.
4. Training regular teachers to use UDL methods and materials within the general education curriculum and training special education teachers to provide standards-based content-area instruction within the general curriculum.

[\[http://community.strategictransitions.com/weblearn/udl/resources/udlinfo/costofnotimplementingudl.pdf\]](http://community.strategictransitions.com/weblearn/udl/resources/udlinfo/costofnotimplementingudl.pdf)

UDL requires fewer classrooms, but just as many person-hours. UDL is just organized differently. UDL will only work if the classrooms and teachers are properly supported. The staff state “As we make this transition, we anticipate teachers will have the capacity to make universal accommodations in their general education classes”

How does the school district guarantee teachers will have this capacity and how are they going to measure and monitor the capacity to make universal accommodations?

Third, while UDL principles enable easier and more effective curriculum customization using technology, teachers still must be creative, resourceful and invested in designing flexible classes that address variability in learners by using a range of high-tech and low-tech solutions. The goal of UDL is to create environments in which every student will have the opportunity to become expert learners, and the means to get there, be it tech or non-tech, should be flexible [<http://www.udlcenter.org/aboutudl/udltechnology>].

Fourth, the community is entitled to more information outlining a realistic time frame for training and implementation of a UDL program in PAUSD, and how will UDL's effectiveness be measured before reducing co-teachers in secondary school classrooms for 2017/18? In fact, effective co-teachers may be more adept at helping to implement UDL given their familiarity and fluency with various differentiated instruction methods for "Representation, Expression and Engagement". Moreover, what will happen to all the co-teachers we have already trained and what is the forecast for teacher buy-in with yet another extraordinary teaching model?

Fifth, at a minimum each site school needs to (i) understand the actual educational, health and social ramifications of each student's disability (not what they "imagine" they know about it), and review the curriculum in the context of each student's IEP or 504 plan in advance to determine the accommodations and modifications that will be needed; (ii) revise homework or classroom materials as appropriate for each student to access the curriculum; (iii) figure out how to push-in, rather than pullout some therapies and support; (iv) provide in-class accommodations which are often provided by a classroom aide that works with the teacher; (v) identify and respond to social emotional needs of the student. UDL is not less work, it's just a better educational model.

In closing we strongly advise the board to work with the community and do the research to determine what will work best for the Palo Alto Unified School District. Before moving from co-teaching to UDL, the Board should ensure that the district has performed a thorough review of how similarly situated school districts (e.g., New Trier, Scarsdale, Edina, Chapel Hill, Wellesley) supported teachers in UDL classrooms and the costs associated with a move to UDL.

Sincerely,

Kimberly Eng Lee and Christina Schmidt

Palo Alto Community Advisory Committee for Special Education (CAC)

Cc: Holly Wade, Ph.D., Chief Student Services Officer

Chiara Perry, Ed.S, Director of Special Education