Review of Special Education in the Palo Alto Unified School District

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Recommendation 1:   Define the purpose and goals of Special Education in PAUSD.

Recommendation 2:   Include students with disabilities in the PAUSD Equity Plan.

Recommendation 3:   Consider building capacity to provide Universally Designed curriculum and instruction to all students.

Recommendation 4:   Districtwide, increase the knowledge of effective strategies to use for specific disabilities.

Recommendation 5:   Require every school to become an effective inclusive community.

Introduction

Superintendent Dr. Max McGee and Chief Student Services Officer Holly Wade requested a review of the special education program in the Palo Alto Unified School District (PAUSD). We proposed to:

- Visit the district for one week to tour schools, conduct informal observations in classrooms, meet with parents, teachers, and school and district level administrators.
- Conduct analysis of student level data to identify patterns of identification and placement related to specific demographic variables.
- Identify factors related to student achievement related on relevant outcomes.
- Conduct online surveys of parents, administrators, and teachers to understand attitudes and beliefs about students with disabilities, readiness and capacity to improve inclusive practices, and key obstacles to improving education for students with disabilities.

Method

We collected and analyzed our data during the spring of 2016. As such it represents a snapshot of special education at that time. This report is based on quantitative – or statistical – analyses of district and school data, and qualitative data – observational, interview, and survey data collected at PAUSD schools and district offices.

Quantitative data on students in PAUSD were provided by PAUSD district staff. We received data on students' special education status, primary disability, percent of time in general education, grade, gender, race/ethnicity, income status, and school for the entire district from the 2014-2015 school year as well as CAASPP results from the CAASPP/CDE website. Where possible, we used publicly available data sets and reports to provide comparison information on students in California and across the country. We examined both student and school level factors associated with the identification, placement and performance of students with disabilities in PAUSD.

We administered three separate online surveys: one for parents, one for teachers, and one for school principals. We designed these surveys to over-sample on questions related to areas for improvement so that we could focus on recommendations. We also developed the survey so that parents of students with and without disabilities could respond to the survey. The survey was distributed by the PAUSD Research Office through an email link.

We visited six schools and conducted informal classroom observations. We also spoke with parents, teachers, staff, and district and school administrators. We surveyed parents, administrators, and teachers, and parents sent additional e-mails detailing their experience with the district.

We are greatly appreciative of the support and cooperation we received from parents and staff at all levels of the district.

Summary of Findings and Recommendations

      Students with disabilities in PAUSD have benefitted from the overall excellence of the district. PAUSD has higher than average rates of inclusion and outcomes for students with disabilities. The performance of students with disabilities in PAUSD are comparable with the performance of students without disabilities in the rest of the state. Additionally, the district has some promising inclusive practices emerging in Early Childhood and Elementary schools. We encountered and heard from parents, teachers, staff, and administrators who are committed to improving special education systems for students and their families. Finally, we were encouraged by the work of the Minority Achievement and Talent Development Advisory Committee, which offered suggestions for improving equitable access to opportunities that we found very relevant for students with disabilities.

      However, we found that PAUSD had several key areas for improvement in the education of students with disabilities. First and foremost, special education has at times become a catch all for academic failure. As a result, efforts to provide access and accommodations for student's disability specific needs has in some cases been approached as general academic remediation rather than targeted instruction and supports. Some of the gaps in proficiency between students with disabilities and non-disabled students in PAUSD may be related to lower expectations for students with disabilities, disproportionate enrollment in "low lane" classes, and a lack of early and targeted interventions. We recommend the implementation of a Response to Intervention (RTI) system that will proactively identify and address academic difficulties.

      Furthermore, we noted a clear theme of mistrust and frustration from some of the parents we spoke with during our visit and through responses on the parent survey. Some parents expressed frustration that there has been very little information available about the district's policies for identifying disabilities, participating in Individual Education Plan (IEP) meetings, or procedures for communicating questions or concerns. We recommend that the district leadership and the Student Services department work with school administrators, special education providers and case managers, teachers, and parents to develop a clear a comprehensive Policy and Procedural Manual that describes PAUSD's special education policies and procedures. This manual should clearly state the purposes of special education in the district and become a document that supports all the stakeholders in the district to have a common understanding of how the district supports students with disabilities.

      In addition, we recommended that PAUSD increase the use of Universal Design for Learning (UDL) practices throughout the district. UDL is uniquely well matched the specific needs of PAUSD because it explicitly considers the learner variability present in every classroom. UDL supports classroom practices that allow teachers to address the needs of diverse learners including advanced students and students who may struggle with specific academic content. In universally designed classrooms, accommodations and supports are embedded in the environment and the lesson plans so that students can employ the means that are most efficient for their learning. This approach supports all learners, but for students with disabilities these supports can be the difference between success and failure.

Finally, we recommend that every school in the district become an effective inclusive community in which all children with disabilities are welcomed and effectively educated. Establishing each school as an inclusive community will require significant support to principals and possibly the delegation of authority and responsibility from the central office.

We commend the leadership, teachers, staff, and parents of PAUSD for their commitment to improving education for students with disabilities. We believe that with strong leadership and increased collaboration all students in PAUSD can serve as a regional and statewide model as a system dedicated to equity and excellence for all students.

Areas of Strength

Based on qualitative and quantitative analyses, we have identified five areas of strength in PAUSD as related to the education of students with disabilities. Those findings are detailed here.

Finding 1: PAUSD has higher than national average rates of inclusion in general education classrooms of all students throughout the district.

Our quantitative analysis of student level data revealed that 70.5% of PAUSD students with disabilities were inside or regular classes 80% or more of the day. This rate of inclusion exceeds the national rates of inclusion of students with disabilities (63%) and far exceeds the state average of inclusion (53%). Research over the past 35 years has consistently shown that inclusion in the general education classroom is one of the most important factors associated with better academic and life outcomes for students with disabilities. Inclusion in general education provides students with access to grade level content and content specific teaching that is often lacking in segregated classroom environments. While inclusion alone cannot insure better outcomes, it is the first step in providing access to the type of content and instruction that would enable students with disabilities to achieve at levels similar to their non-disabled peers.

Much of this inclusion can be attributed to the introduction of co-taught classes in the middle and high schools. Prior to the development of co-taught classrooms, parents who responded to the survey described a choice between special education classrooms that were "not challenging" or a mainstream classroom where their child would be "lost." For some students with disabilities, these co-taught classes have provided access to more rigorous curriculum as well as access to support in meeting the expectations of the class.

Co-teaching appears to have been essential in PAUSD in reducing the numbers of students taught in segregated classrooms. These strategies have allowed students greater access to the general education curriculum and opportunities to achieve. We consider the use of co-teaching and instructional attendants as an important part of the district's transformation from a district that segregated large numbers of students with disabilities in separate classrooms to one where students have a wider range of opportunities to participate and succeed.

Finding 2: Students with disabilities in PAUSD have scores on the CAASPP that are comparable or exceed the state's average performance for students without disabilities.

In 2015, students with disabilities in PAUSD met or exceeded proficiency standards at a rate much higher than the state average. In a district where 91% of general education

students met or exceeded state standards of proficiency, 41% of students with disabilities met standards. These rates of achievement are comparable to the statewide average of students without disabilities.

These outcomes are not totally unexpected. In previous research we conducted in Massachusetts, the best predictors of achievement for students with disabilities was the performance of students in general education (Hehir et al., 2010). Also, given that Palo Alto is generally an affluent community, and significantly more affluent than the state as a whole, students from more affluent homes generally perform better in school than their less affluent peers. However, given the high rates of inclusion and the affluence of most families, we should expect this rate of achievement to be even higher for students with disabilities, given the level of resources devoted to students with disabilities in PAUSD.

While rates of proficiency on state standardized tests are only one measure of academic performance, paying close attention to rates of proficiency should be one way that the district continues to consider the effectiveness of their programs. Given PAUSD's overall high academic achievement and low number of students with cognitive disability (0.2 percent compared to a statewide average of 0.5 percent and a national average of 0.6 percent) we should expect the gap between students with disabilities and students without disabilities to decrease over time.

2015 CAASPP Results: Percent of All Students Meeting or Exceeding Standard (All grade levels)
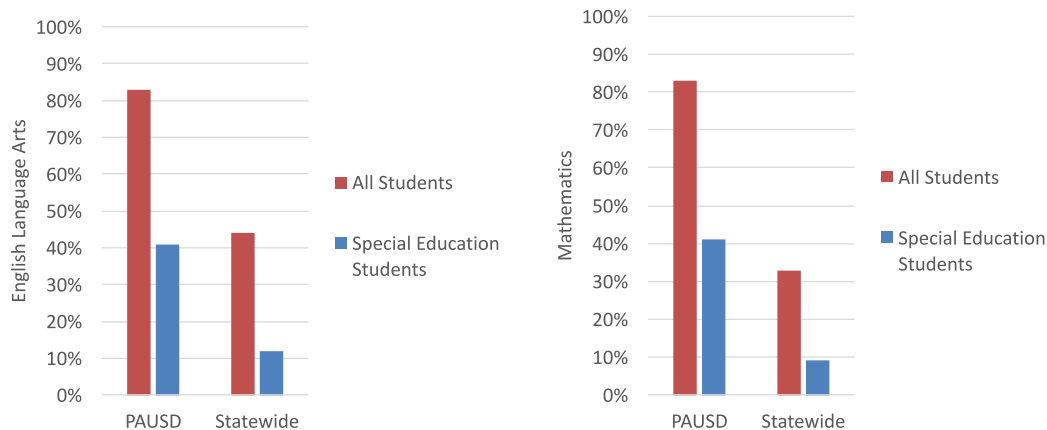
Finding 3: Administrators, teachers, staff, and parents throughout the district are committed to improving systems to support students with disabilities and their families.

Across the district, parents, teachers, and administrators expressed interest, both during in-person meetings and through responses on the surveys, in improving systems of communication and instruction at all levels of the district. We are pleased that the district does not seem content to point at the excellence that it has achieved for many students, but has expressed a strong commitment to equity. The Minority Achievement and Talent Development report the district commissioned demonstrates the seriousness with which PAUSD approaches these issues.

The fact that the district has initiated this review of special education builds on PAUSD's emphasis on equity. In districts that have shown real improvement for students with disabilities, we observe that the focus is not on "fixing special education," but a recommendation that improving educational outcome for students with disabilities requires the engagement of the entire school district. This requires that schools first deal with the diverse needs of students in general education first, while building a robust system of targeted practices and supports to provide for students' disability-specific needs. These approaches require dedicated leadership and clear communication at all levels to succeed. In conversations with the School Board, superintendents, principals, teachers, and parents, we believe that there is a strong and sustained desire across stakeholders to address the root issues related to the education of students with disabilities and embrace reforms that will strengthen education for all students.

Teachers and principals we spoke to, and the results of surveys confirmed that many educators in PAUSD were deeply interested learning more about how they could better support students' academic and behavioral needs within their classrooms. Our interactions with administrators in the district office, including school psychologists, also affirmed the need for clearer communication and stronger systems.

Administrator's Survey Responses

75% of administrators who responded to the survey indicated that they wanted to provide more support to teachers in meeting the needs of students with disabilities. One administrator noted that teachers needed "support around differentiation." Another administrator was concerned about teachers tended to present material, "as if they are college professors" since "a large majority of students are not ready for college courses." This administrator wanted to support teachers in planning, "differentiated lessons" and "intervention for struggling students." Two administrators who responded commented that there needed to be supports for teachers to add strategies to address diverse learners needs in their classrooms in addition to the additional supports provided outside of the classroom. One administrator responded, "We have many Tier 3

interventions but lack universal access to basic accommodations." This administrator was concerned that for students who "lack advocates, supportive families, and have needs but do not have a diagnosed disorder or structured intervention plan are left behind."

61% of administrators surveyed responded that teachers in their schools needed quite a bit or a great deal of support in meeting the social and emotional needs of their students. One administrator responded, "I'd like teachers to understand the learning differences of students with mental health concerns."
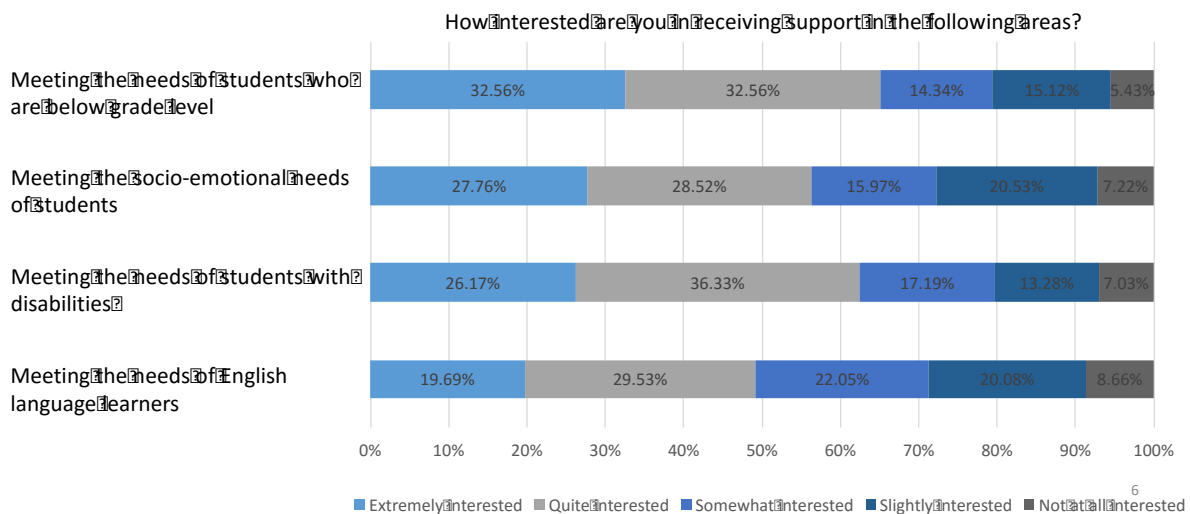
Several administrators wanted to provide better support for teachers implementing the co-teaching model. One administrator wrote, "I don't believe the co-teachers have had the appropriate training so that each expert teacher can co-exist in the classroom in providing a specialized lens." Another administrator noted that the fidelity of implementation of the co-teaching model "is directly related to the case manager and their investment in this model." She noted that when co-teaching was most effective there were, "caring and motivated instructors as well as capable case managers."

Our survey of administrators clearly demonstrated both their knowledge of the needs of students with disabilities, their willingness to include these students, and their desire to improve educational opportunities for these students. Unlike some districts where principals relegate the responsibility to the improve special education to the central office, these leaders evidence high levels of responsibility for the education of students with disabilities.

Teacher's Survey Responses

62% of teachers completing surveys expressed being extremely interested or quite interested in additional support for meeting the needs of students with disabilities. Additionally, teachers also expressed strong interest in receiving additional support in meeting the needs of students who are below grade level and English Language Learners (ELL).

Most teachers would like additional support for students with disabilities

How interested are you in receiving support in the following areas?

	Extremely interested	Quite interested	Somewhat interested	Slightly interested	Not at all interested
Meeting the needs of students who are below grade level	32.56%	32.56%	14.34%	15.12%	5.43%
Meeting the socio-emotional needs of students	27.76%	28.52%	15.97%	20.53%	7.22%
Meeting the needs of students with disabilities	26.17%	36.33%	17.19%	13.28%	7.03%
Meeting the needs of English language learners	19.69%	29.53%	22.05%	20.08%	8.66%

■ Extremely interested ■ Quite interested ■ Somewhat interested ■ Slightly interested ■ Not at all interested

Teachers who responded to the survey also provided comments on the types of support they were interested in receiving to better serve students with disabilities. Several teachers commented that they were interested in, "more professional development, observation and feedback in the classroom." Many teachers requested specific modeling and examples of lessons through coaching and mentoring by those with expertise. One teacher requested that, "someone come into the classroom and help to facilitate and give insight. Be able to look at my classroom dynamic and then from there be able to tell me how I can support the varied range of learners in my classroom."

Teachers emphasized that they wanted to learn about strategies they could apply in their classrooms and the ongoing support to implement them well, versus "theoretical" ideas or advice. One teacher requested, "specific examples of student problems & actions/interventions/strategies teacher can take in the class to help students," as opposed to "canned lectures" by academics. Another teacher requested
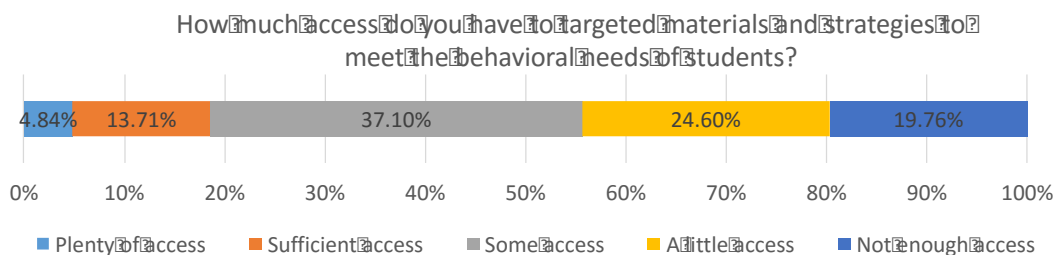
professional development that went "beyond single day of presentation--present, let us plan something in professional learning groups, teach, debrief and discuss." Several teachers noted that large group meetings were often less effective than working with peers they chose or peers working with the same students of same subject areas. One teacher wrote that she wanted, "Time to collaborate with peers who teach what I teach." Another teacher was clear that she would appreciate, "more time to collaborate with my co-teacher and other teachers of the same subject who have similar teaching philosophies and whom I trust." Providing time for teachers to work together might help build this trust among more teachers. A teacher responding to the survey succinctly wrote, "So many meetings/trainings, and not enough time to collaborate and plan and implement."

Many teachers who responded to the survey mentioned the value of observing other teachers and working closely with peers. Several mentioned that they would appreciate more planning time to meet with teachers and instructional aides. A special education teacher commented that she would like, "Time to collaborate with the general education teachers so we are working together to serve the needs of our shared students." Another teacher expressed the concern, "I often feel that I don't have enough time in the day to design lessons with appropriate accommodations for students with special needs."

Several teachers mentioned that the Project GLAD (Guided Language Acquisition Design) training they received provided the structure, modeling, and feedback on their classroom practices that exemplified the type of professional learning experiences they were seeking. Several other teachers who responded to the survey requested the opportunity to participate in Project GLAD.

Teachers responding to the survey specifically requested ways to support the behavioral needs in their classrooms. One teacher wrote, "I would like support in creating a classroom environment conducive to the needs of all students, while keeping behaviors aligned with classroom expectations." Another teacher wrote, "all teachers receiving students with extreme behaviors or special needs should be required/offered special training prior to the school year to learn about the student and effective techniques/practices to support them." A high school special education teacher wrote, "I am also concerned about how much difficulty many of our teachers have when students present challenging behaviors. Their lack of experience in knowing what to do to prevent behaviors to begin with, and in addressing unexpected behaviors when they come up, tends to manifest in anxiety for teachers and relying too heavily on special education staff." Several teachers also mentioned wanting to learn more about how to support the social and emotional needs of students. In the teacher survey only 18.5% of teachers who responded indicated that they have sufficient access to targeted materials and strategies to meet the behavioral needs of students.

Many teachers say they have little access to materials and strategies for meeting students' behavioral needs

How much access do you have to targeted materials and strategies to meet the behavioral needs of students?

| 4.84% | 13.71% | 37.10% | 24.60% | 19.76% |

0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

■ Plenty of access ■ Sufficient access ■ Some access ■ A little access ■ Not enough access

Teachers who responded to the survey frequently mentioned student's mental health as something they were concerned about in addition to academics. One teacher wrote, "I am not trained as a counselor or psychologist and we are increasingly being expected to be available emotionally to students with pretty large emotional needs and to be sensitive to students who struggle with stress. The school counselor does not have time to do it all so some of it falls on the teachers."

Several teachers mentioned wanting more involvement from the school psychologists on the survey. One said that psychologists could be involved in "observation and intervention" and another wrote, "I wish they ran play groups and family groups and met with children more often."

One teacher responded on the survey that she wanted more than "an outsider to pop in for a few minutes and suggest things," especially when they felt like techniques that teachers were aware of, like "rewards charts or chair bands." Another teacher summarized by writing on the survey, "We want new interventions!"

Parent Survey Responses

Parents in their survey responses, expressed that caring and qualified teachers made the difference in their child's education. Some parents praised "teachers take the time to connect with and support kids" and "teachers that were very supportive and dealt sensitively [with the child's disability related needs]."

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However, parents were very emphatic about wanting better systems of communication, more clarity about the process of identification and developing IEPs, and more data-rich reports on their child's progress. Parents on the survey wanted to feel respected, heard, and included in the process. Parents who were very satisfied with their experience noted that they felt included and supported through the process. One parent of a student with a learning disability wrote, "PAUSD is very focused on meeting the needs of the student, which is great. They are meticulous, and take parent input into account. They have a team approach which provides a complete picture of the child--and provides insight into his overall growth." Another parent of a student with autism wrote, "Whenever we've had concerns with services… we've been able to raise those concerns with the IEP team and have them addressed. The school principal is always quick to response and ensures follow through of solutions." However, these types of experiences were not common enough among the parents.

Many parents on the survey also mentioned wanted more training for teachers, instructional aides/attendants, psychologists, and special education providers. One parent of a student with autism wrote on the survey the desire that general education teachers be, "knowledgeable about the various types of disabilities that they will see in the students who are mainstreamed in their classes." Another parent of a student with a specific learning disability also noted that general education teachers, "need more training on how different disabilities effect students in the classroom." Many parents were empathetic about the demands on teachers to meet the needs of diverse students in large classes. A parent expressed concern that "teaching staff have so many "balls in the air" that they have to juggle that there isn't time to really spend mentoring and building connections with students." Another parent noted that teachers would benefit from more, "professional development and follow up MENTORING to help teachers develop and hone their differentiated instruction skills."

Finding 4: 2015 report of the Minority Achievement and Talent Development Advisory Committee (MATD) offered a clear set of recommendations that are also highly relevant for students with disabilities.

We commenced our work examining special education in PAUSD around the time that the MATD report had been released to the public. In that report we found many recommendations that were highly relevant to students with disabilities. Chief among those recommendations was the development of a Response to Intervention (RTI) model that would support the early identification of difficulties in reading and math and the provision of timely interventions that address student needs within core instruction. Additionally, the MATD report recommended that students who showed risk of academic difficulty be offered a full day kindergarten option as well as access to summer

and after-school enrichment opportunities. Once established, these structures could be used to provide additional instruction to students with disabilities as well.

One of the critical findings of the MATD related to an "underlying and unconscious narrative of bias," that resulted in assigning Historically Underrepresented (HUR) students to lower lane classes and singling them out for behaviors that would be ignored if they were white or Asian. Most importantly, the MATD pointed out that teachers may unconsciously be setting lower expectations for HUR students and employing a "deficit approach" that emphasizes students need for "help" rather than their capabilities. In disability studies, the negative perceptions of people with disabilities is referred to as "ableism." In education, ableism manifests itself in the belief that "it is preferable for disabled students to do things in the same manner as non-disabled students" (Hehir, 2012, p. xi). Furthermore, as Hehir wrote in *Effective Inclusive Schools* (2012)*,* "Ableist assumptions cause harm when the… services provided to disabled children focus inordinately on the characteristics of their disabilities to the exclusion of all else—when *changing* disability becomes the overriding focus…" (p. xi). Like other forms of prejudice, these beliefs can prevent students with disabilities from opportunities that would support their development into competent and independent adults with full lives.

As the MATD so eloquently stated, all of PAUSD's students deserve, "the opportunity and access to programs, practices and personnel that will empower every child to attain his or her highest intellectual, creative and social potential."

Finding 5: PAUSD has examples of very promising practices in the district, specifically in the Early Childhood inclusion program for students with autism and emerging inclusive practices in elementary schools.

During our visit to the district we observed examples of promising practices across the district. We saw students with multiple disabilities participating in general education classrooms at the high school. We observed classrooms where students were active and engaged in hands on learning.

Two examples featured prominently in our observations. First, at Greendell Preschool we observed a dynamic and enriching classroom where students were moving independently between activities, interacting with adults and each other, and participating in learning that supported their language and social skills. During a circle time when all the students gathered to hear a story, it was clear that the students were familiar with the routines and expected to participate, but what being an engaged listener looked like differed by child. While not every student was sitting with their hands folded in their lap, all of the students were listening and participating in the story and the related activity. Clearly the teachers in this classroom had designed their classroom and their instruction to not just "allow" students with disabilities to

participate, but to encourage and support it. PAUSD should be proud to have these types of classroom experiences for students.

At Fairmeadow Elementary, we spoke with Principal Althouse abut the inclusion of more students with autism in their elementary program. He noted the strong benefits he saw from those student's early inclusion in the preschool program. He admitted that teachers were initially nervous about including students with disabilities, but seemed to quickly recognize that they were "just kids" and had many more similarities than differences with their non-disabled students. Additionally, Fairmeadow has implemented the Second Steps (K-2) and Steps to Respect (3-5) program to support the social and emotional health of students, but also to emphasize empathy and problem solving around differences. Mr. Althouse mentioned that having that program in place and school wide seemed to be supporting students in understand expectations and working together.

We know that there are many more examples of practices like the ones we observed at Greendell and Fairmeadow that should be recognized. We point out these two examples because they exemplify the fact that an effective inclusive program cannot be a series of add-ons of programs or people, but rather intentionally designed into the school and the classroom and supported by teachers and principals.

Areas for Improvement

Finding 6: Currently having a disability in PAUSD is associated with academic failure. The process of identifying and providing supports and accommodations should be proactive and preventative.

Survey responses from parents and teachers both indicated that PAUSD is still employing a wait to fail model that tends to delay evaluation of learning disabilities until students have failed to make progress. As a result, teachers and principals may unconsciously assume that students with disabilities are not capable of meeting academic standards. In the teacher survey, teachers ranked needing support with students who are below grade level at almost the same rate as meeting the needs of students with disabilities.

Parents who responded to the survey indicated that at the school level they were told by teachers or administrators that a special education diagnosis was only for kids who were, "in really bad shape." Parents were concerned that having a disability was associated with low expectations. One parent of a student with a learning disability wrote, "Being dyslexic does not mean that the kid is not intelligent."

Parents in the survey expressed some concerns that diagnosis of a learning disability excluded their students from some of the district's more challenging offerings in high school. One parent wrote, "The assumption is that students who are eligible for special education services will not be in challenging classes. There is no special ed academic support for AP lane classes." Other parents noted that their child had been enrolled in co-taught classes that were not academically challenging or engaging.

Disproportionate rates of identification of Black/African American and Hispanic/Latino students

Additionally, in our analysis of identification patterns in the district, we noted that Black and Hispanic students have disproportionately high rates of 504 Plan and IDEA identification, with 27% of black students and 22% of Hispanic students identified as having a disability, nearly double the IDEA rate of black and Hispanic students nation- and statewide.

27% of students from low income backgrounds are identified with an IDEA or 504 Plan, compared to 10% of students from non-low income backgrounds. In addition, 14.9% of all low-income students in PAUSD are diagnosed with a learning disability, while just 2.7% of non-low income PAUSD students have been identified with a specific learning disability.

Previous findings by the MATD suggested that Historically Underrepresented students (HUR) may be subjected to a "deficit mindset" regarding their academic

capabilities. As a result, teachers and administrators may look to special education as a benefit of additional services for students. In other communities where we studied the over-identification of students, teachers often felt that special education was the only avenue to provide remediation or accommodations. However, for students of color in particular, identification of in special education can be a further means of lowering expectations, limiting access to the full complement of educational opportunities in the district, and stigmatizing students.

This finding does not mean that PAUSD should stop identifying HUR students, but rather, to proactively support students through RTI strategies, and ensure that referrals to special education are supported by multiple sources of data.

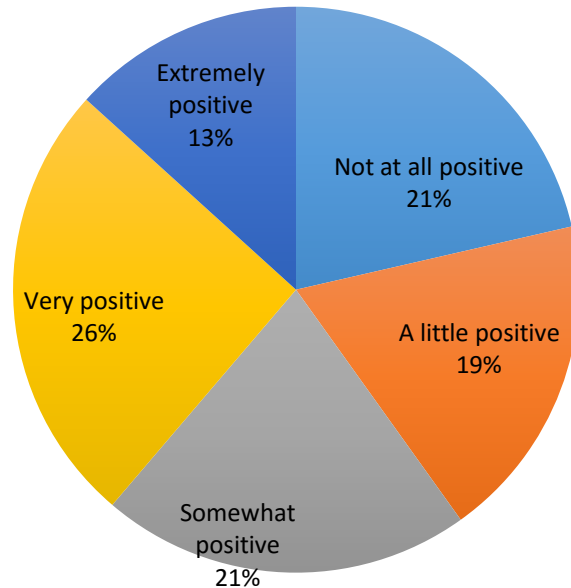## PAUSD Identification by Race
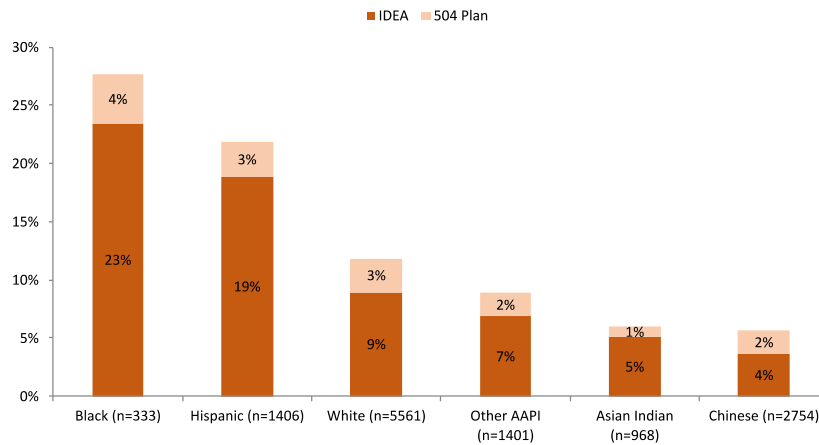
Finding 7: The identification process for 504 and IEPs is a barrier to providing targeted supports and accommodation in a timely fashion.

In the parent survey, parents expressed concerns that delays in identification meant that their child struggled and fell further behind. Fully 40% of parents responding to the survey indicated that the identification process was "Not at all positive" or "A little bit positive."

How would you describe your experiences with PAUSD staff in the identification process? (n=369)

Pie chart showing:
- Not at all positive 21%
- A little positive 19%
- Somewhat positive 21%
- Very positive 26%
- Extremely positive 13%

"Starting earlier" was a clear theme in the parent comments on the survey. Parents expressed satisfaction when their child's teacher brought concerns to their attention in early grades and the identification process followed soon after. Other parents described requesting evaluations and being discouraged. Parents also expressed frustration with the inconsistency of responses that they encountered with different schools, subject areas, and individual teachers.

Several parents reported on the survey that they recognized their child's learning difficulties in early grades, but identification was delayed for two or more years with detrimental effects on their child's confidence and ability to meet grade level standards. As noted in Finding 6, when disability is exclusively associated with academic failure, many bright students with disabilities may be overlooked. Furthermore, teachers and administrators may want students to avoid the stigma of failure that is currently associated with special education in the district. However, parents are interpreting this response from schools and districts as based solely on the need to save money.

Moreover, many parents described needing to ask for support repeatedly, over time, which suggests that parents with less ability or inclination to advocate for their individual child's needs may be ignored. One parent wrote,

"One issue for some kids, like our child, is that they are very bright and therefore the teachers ignore the disability because the child is coping. I have heard this over and over from other parents as well. The elementary school teachers should take this more seriously, and not tell parents... "oh...s/he will catch up later" as we were told repeatedly from kindergarten on."

Finding 8: Parents lack information about policies, practices, and procedures related to accommodations and special education and as a result a portion of parents mistrust the district.

One parent's comment effectively summarized a feeling from many parents that, "The identification process carries a lot of uncertainty both the qualification itself and service it provides." Parent Survey respondents noted that there was no available information about the steps of the process or district policies around IEP meetings or how to communicate concerns or grievances. As one parent respondent on the survey explained,

> "Provide clear, easy to understand, materials on the process from when you are concerned about your child, though getting and having an IEP (or other possible outcomes). Parents new to the process are confused. Everyone says to start by talking with your teacher, but what comes next, and what are other options if you don't feel satisfied by your teacher's response?" (Parent of an elementary student with a specific learning disability)

In a contrasting example, one parent wrote on the survey,

> "Building [a] good relationship with my case manager was the key to the success of the process and services. Only when she got involved things started to go well. The whole team worked toward the success of my child and it was nice to see and experience it."

Several parents on the survey responded that they did not feel confident enough to attend IEP meetings without advocates. Another parent described the feeling in the following way.

> "Too often the district has that a majority of IEP team players at the table, so the families feel out-voted, unimportant, and disrespected. It's a good thing that district has so many folks on board, but it's a bad thing that the families don't get enough of a chance to hear from the district that this WHOLE process is about the child..."

This parent also wanted the district to encourage the feeling that, "parents (and older students) are the most important people on the IEP team."

Finding 9: The district lacks data that is instructionally useful in improving educational practices and identifying the impact of practices on students with disabilities.

While schools and districts can often feel awash in data, providing data that is instructionally useful to teachers and informative to parents can often be a challenge. In our efforts to better understand the performance of students with disabilities in PAUSD, we encountered several barriers. Ideally, schools collect that offers some formative data, during the school year, while teachers have time to respond to the results. Statewide tests provide only one data point, and those results are only available after the child has left the grade.

Ideally, as part of implementing RTI, PAUSD would select a universal screener to be administered in the Fall, Winter, and Spring. Universal screeners are designed to be brief, reliable, and valid and provides teachers and parents with information on student's level of performance, as well as growth over the year. Because a universal screener uses the same scale, district and school leaders can look at performance and growth across schools, classrooms, and students. For example, it could provide data that would allow for comparisons between the growth of seventh grade students with disabilities in math to their non-disabled peers. These kinds of analyses can help the district and schools pinpoint areas for instructional improvement.

RTI systems also call for valid and reliable progress monitoring of students receiving interventions. Again, these measurements are designed to be brief, but administered regularly to allow teachers to see if interventions are resulting in an adequate rate of improvement. That way, if a particular strategy or program is not helping a student to improve, teachers can decide to increase the frequency or duration of the intervention, or change strategies. This kind of data based decision making ensures that times set aside for intervention are being used for maximum benefit. This data can also be used to show that students are not responding to additional instruction and provide a data-based justification for a referral to special education. By law, the RTI process cannot be used to delay or deny referral to special education. However, when a solid RTI system is in place, students receive interventions immediately, and the progress monitoring data collected can be used as part of the referral process and inform goals and strategies if an IEP is developed for the student.

Progress monitoring is also useful for students receiving special education services. In the survey, parents wanted more information about progress their child was making in general education and as a result of special education services.

One parent wrote,

> "I think progress reports on my son would have been much more effective [than her initiating check-ns with the teacher.] It doesn't need to be formal or in writing but contact imitated by the school bimonthly for him would be hugely helpful…I believe he has gotten away with doing a whole lot of nothing in his Read 360 class. He is a smart persuasive kid and I worry that he was able to hide out in that class and wasn't challenged."

In this instance, if progress monitoring data was available, the teacher, parent, and the student would be able to see the growth that the student was making, or if data showed little growth, the teacher could make adjustments to the student's program.

Data is also extremely valuable in developing IEP goals that are appropriately ambitious. One parent expressed concern about the lack of data used to adjust goals. They wrote,

Every year they would write new goals regardless of whether the previous goals were even met or worked on.

"Not once did they say, "here is the data to show that progress is being made." There was never any data. Anecdotal evidence is not data! Every year they would write new goals regardless of whether the previous goals were even met or worked on."

Parents, school administrators, and teachers all would benefit from knowing that the interventions and instruction they provide are making a difference. Developing clear expectations for collecting data that is valid, clearly presented, and shows growth over time might alleviate some conflict around additional services or instruction that students need.

Recommendations

Recommendation 1: Create a comprehensive policy and procedural manual for Special Education in PAUSD.

The issue of communication and transparency was common in all our surveys. This is often the case in districts regarding special education. The processes associated with serving students with disabilities are complex and at times confusing to parents and school staff. Furthermore, there is often confusion over the goals and purposes of special education. This is the case in Palo Alto. Many educators view special education as a remedial program. Further, many parents felt their children would have benefitted from earlier intervention and others sought access to more challenging curricula. This is why both parents and school staff need a comprehensive manual to assist them in assuring that students with disabilities have access to high quality education and that students without disabilities not be placed in special education programs. No such manual exists in PAUSD.

Specifically, an effective district handbook should speak to the context of PAUSD. Every school district is unique and parents and school personnel need to know who are responsible for various aspects of serving students and where to go to get resolution to issues. The manual should Clearly articulate the purpose of disability identification (Child Find) and the role of special education (IDEA) and Section 504 in providing students with disabilities with interventions, supports, and accommodations that enable them to access the curriculum and meet the unique needs that arise from their disability. A user friendly description of district policies and procedures related to identification, IEP development, and types of services, support, and accommodations that students with disabilities may or may not require needs to be central to this document. As a parent of a student with a learning disability wrote, "At the start, it would be helpful to have had a sense of a "roadmap" of the process, so I would know what the steps might take place and when."

An important policy that needs to be articulated in this manual is that special education is not a catch all for students needing academic remediation. Furthermore, the manual should detail other options within the district for students who may be struggling but not have a disability. In addition, it should be emphasized that not all students with disabilities struggle academically or behaviorally though they may need accommodations and support to reach their academic potential.

The manual should specify that students with disabilities deserve specialized and individualized approaches that match their goals and needs. We found that too often special education support amounted to general assistance for students as opposed to

the specialized interventions and accommodations many students need. Some practices such as categorically assigning students to co-taught classes, or the over-use of one-on-one aides that can increase dependence and lower expectations should be cautioned against. However, the importance of students accessing more advanced classes, such as AP, should be encouraged. In short, the manual should promote individualized programing allowing for maximal access to educational opportunity.

Recommendation 2: Include students with disabilities in the PAUSD Equity Plan.

Our findings and recommendations are in accordance with most of the findings and recommendations from the MATD. The goal of providing students with disabilities with equitable education is complimentary to the MATD. Specifically our recommendations and the MATD seek to ensure that students with disabilities have access to the rich and robust curricular and enrichment opportunities, including advanced classes just as the MATD plan does. The means to accomplish this involves professional learning for all administrators, teachers, and staff to emphasize an assets based approach to working with students. These professional development opportunities should be supportive of much of the improvement activities we propose. We believe these activities should be integrated.

As described in the MATD, we recommend that PAUSD employ a system of Response to Intervention (RTI) for the early identification of academic difficulty and proactive provision of additional instruction to those students. Research has clearly shown that when students struggling with reading receive early interventions their reading improves so that they are able to meet grade level expectations. Furthermore, early identification means students don't have to experience years of failure and frustration before receiving support. This system will also help to differentiate between academic difficulties that are disability-related from those that are occurring because of lack of adequate or appropriate instruction. Proactively providing additional supports to all students means that even students who will be later diagnosed were not waiting for an IEP to receive additional instruction.

Providing students who struggle academically with evidence based, targeted strategies is also essential in preventing academic failure. Too often in schools, students receive "help" from a caring and interested adult who lacks the materials, strategies, or training to address students' targeted needs. A research based universal screener would enable teachers to recognize students who are at risk of academic difficulties (prior to multiple years of failure), but also target specific skills deficits. For example, two students may both struggle with reading, but one student has not yet mastered their letters and sounds, while the other student struggles with comprehension. The type of targeted teaching they receive should look very different. Placing them both in a group for "low" readers that offers general remediation (a slower pace, easier text, more adult

prompting) may not meet their needs as efficiently as grouping students with similar needs together and using specifically targeted materials and strategies that have proven effective in improving outcomes.

Finally, providing early intervention and carefully monitoring student progress using a valid measure allows for students, parents, and teachers to see what strategies work best for students. For students who do not respond to evidence-based instruction this data can support the identification of a disability, but furthermore, the progress monitoring data can be included on the student's IEP so that students can continue to use strategies that are supporting growth and not employ strategies that have been shown by data to be ineffective in the past.

Recommendation 3: Build capacity to provide Universally Designed curriculum and instruction to all students.

While we acknowledge that teacher quality is always the most critical component to an effective classroom, we find that placing the responsibility for supporting students with disabilities on teachers alone is unrealistic and unsustainable. A teacher responding to the survey wrote, "The model of inclusion requires more prep time, and coordination," and she noted her concern that as a teacher, she couldn't "meet the demand" of the workload. A systems based approach would begin with a strong understanding on the part of district leadership around the benefits of inclusive practices, strong training and on-going support of principals in effective practices for educating students with disabilities, and support for teachers at every level that is on-going and job embedded. This support includes providing teachers adequate time to plan, collaborate with other teachers and service providers, have conversations with parents to solve problems related to the needs of individual students. A systems-based approach makes roles and responsibilities clear at all levels and supports collaborative problem solving among all those involved in a child's education.

Universal Design for Learning (UDL) principles support schools in designing classrooms to support learner variability, from students below grade level to gifted students. UDL embeds challenge and support into the classroom environment and the design of lessons so that students can use have flexible access to accommodations. Curriculum and instruction are designed to support multiple means of representation, action and expression, and engagement. Response to Intervention (RTI) and Positive Behavioral Interventions and Supports (PBIS) also reflect some of the principles of UDL. All classroom environments and lessons are planned to offer varying levels of support so that all students can meet learning goals. There is an explicit focus on engaging and sustaining student motivation to learn and executive function to foster independence. Specialists contribute to designing accommodations and providing supports targeted to student's specific goals and needs.

While co-taught classrooms have undoubtedly contributed to high rates of inclusion in the district, we have found that co-teaching has the potential to limit student's access to classrooms with high expectations. In a schools adopting the co-teaching model students must be assigned to a co-taught classroom in order to receive support. In survey's parents noted that choices of co-taught classes were limited. Content in co-taught classes is similar to "low lane" content. Special educators help students who struggle "keep up" with the rest of the class.

Survey data also indicates that PAUSD teachers are not strongly attached to the co-teaching model. Further, PAUSD teachers also have more confidence than PAUSD administrators in the outcome of a more inclusive model for students with disabilities. A majority of PAUSD teachers surveyed believe students with disabilities would do worse academically if they were in classes **only** with others students with disabilities. Teachers have more confidence than administrators that students with disabilities can meet academic expectations in a non-co-taught classroom. Teachers are less confident than administrators about the quality of the co-teaching model, with only 42% of teachers calling the model of average quality or better. 60% of administrators, on the other hand, thought the quality of the co-teaching program were of average or better quality.

Though we seek a more robust universally designed instructional model with improved access to education in every classroom, we recognize the importance of retaining some co-taught classrooms as the transition to UDL moves forward. Though UDL is effective for most students with disabilities, developing expertise among teachers in these approaches takes time. Further, we recognize that the diversity of needs among the disability population necessitates multiple approaches.

Recommendation 4: Increase the knowledge of effective strategies to use for specific disabilities districtwide

Based on our review we believe that there is a need in PAUSD to build capacity throughout the district to **address the specific disability related needs** of students to enable them to maximize their educational opportunities. For example, use research-based strategies to support and accommodate students with dyslexia appears to be lacking. For instance, one teacher clarified this need succinctly.

> "I worry about the lack of services our students with IEPs are receiving. They are supported mostly by aide support and their needs are not being met. It is difficult for them to continue making the progress they are capable of because they are not receiving the purposeful, teacher-provided interventions required."
> – Teacher Survey Respondent

Variations on this theme was echoed by other teachers and parents as well. A primary goal for dyslexic students should be learning strategies and having appropriate accommodations so that eventually they can become expert independent learners. These children need specialized interventions from trained teachers as early as possible to get them on the right track to learning. Studies of highly successful students with disabilities support providing students with strategies that encourage students to understand the impact of their disability in how they learn and interact. Teachers and parents need support in helping students develop these strategies and attributes.

Recommendation 5: Require every school to become an effective inclusive community.

PAUSD district leadership should develop a clear vision for the purpose of special education and that every school must be an inclusive community. Our recommendations are designed to support this goal.

Policies and training around Response to Intervention (RTI), and Universal Design for Learning (UDL) will support this goal. Our surveys and our other interactions with district educators evidenced commendable support for inclusion. Collaboration is central to establishing effective inclusive schools. Effective approaches to educating students with disabilities requires ongoing collaboration between General Education and Special Education. Effective collaboration requires dedicated time and expert facilitation. Therefore, capacity development of all staff should be ongoing and job embedded. Opportunities for coaching and detailed feedback should be provided at every level. As the teacher survey indicated this is exactly what teachers are seeking.

As is the case with all school improvement data should drive instructional planning and decisions. Many parents in PAUSD would welcome the opportunity to be included as partners in sharing data, being involving in decision making, and soliciting feedback. Finally, as appropriate, student feedback and leadership should be part of school improvement efforts.

Establishing each school as an inclusive community will require significant support to principals and possible delegation of authority and responsibility from the central office. School based staff should all be report to the principal of the school. For instance, school psychologists who currently serve quasi-administrative roles for the central office may be utilized providing direct mental health services in the building. This need surfaced prominently in our surveys. The role of the central office will require an adjustment away from "running special education" to assisting the schools in meeting their responsibilities to effectively educate all students and effectively intervening when necessary to assure that the rights of these children to appropriate education are maintained.

Conclusion

We would like to thank the Palo Alto community for welcoming us and allowing us to assist in your efforts to improve educational opportunity for students with disabilities. We are impressed with the willingness of leadership, particularly Holly Wade and Chiara Perry and Superintendent Max McGee to open the district practices up to the scrutiny this evaluation required. We appreciated the commitment of parent leaders in the district who shared their insights and their visions for their children with us. Finally, we met many educators in the district who through their competent teaching and committed leadership are providing students with a firm foundation for the future. We hope that these recommendations will be seriously considered and provide a basis for continued progress in expanding educational opportunity to all children.

Index of Appendices

A. Data Sources
B. Purpose of Data-Rich RTI Framework
C. Properties of RTI Screening and Progress Monitoring Tools
D. Summary of Survey Response Rates and Demographics

A. Data Sources

1. Quantitative:
   - Student level data for the entire district (2014-2015)
   - CAASPP results from the CAASPP/CDE website
   - US/CA comparison from OSEP 37th Annual Report to Congress: http://www2.ed.gov/about/reports/annual/osep/2015/parts-b-c/37th-arc-for-idea.pdf
   - National data on inclusion of students with disabilities: National Data: https://nces.ed.gov/fastfacts/display.asp?id=59
2. Qualitative:
   - School visits and informal classroom observations
   - Conversations with parents, teachers, staff, and district and school administrators
   - E-mails from parents
3. Qualitative/Quantitative
   - Surveys of parents, administrators, and teachers

B. Purpose of Data-Rich RTI Framework

- A robust, district wide RTI Framework would provide a data-rich way to consider instruction, the needs of individual students, and the progress students are making towards their goals.

- It is a **prevention** framework, designed to identify and respond to risk before failure.

- A strong RTI Data System should:
    - Be based on research validated tools for universal screening and progress monitoring.
    - Offer teachers, administrators, and staff detailed information about areas of student needs at the school, grade, classroom, and individual student level.
    - Be independent of curriculum and vertically aligned.

C. Properties of RTI Screening and Progress Monitoring Tools

From the National Center on Response to Intervention, rti4success.org

- Brief
- Strong psychometric properties
- Sensitive to change
- Equated alternative forms
- Independent from a specific curriculum
- Measures skill gaps
- Aligns to targeted interventions
- Guides understandable goal setting

D. Summary of Survey Response Rates and Demographics

Demographic Profile of Parent Respondents

- 1,385 respondents began the survey, 906 completed it in its entirety.

- Respondents were predominantly white (54%), followed by Asian (30%).

- Only 82 (7%) identified themselves as belonging to more than one racial/ethnic group.

- Most common language spoken at home was English (65%), followed by Chinese (9%) and Spanish (7%); 13% indicated they spoke a language other than what was listed on the survey.

- Respondents were parents to mostly male students (58%) (1% were either transgender, other, or not disclosed).

- Children's grade levels were evenly distributed; Less than half of respondents were parents to elementary school children (42%), a quarter (24%) were parents to children in the middle grades, and a third (32%) were parents to high schoolers. A few (2%) indicated their children were in post-secondary education or other.

Profile of Teacher and Administrator Respondents

- 369 teachers responded to the Teacher Survey.

- 37 Administrators responded to Administrator Survey