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Introduction & Methodology

Introduction

Somerville Public Schools (SPS) contracted with Public Consulting Group (PCG) to provide a comprehensive assessment of the District’s special education services. The assessment involved an examination of the effectiveness and efficacy of SPS special education policies, procedures, and practices. The focus of this review is on the overall effectiveness of the program.

Organization of the Report

This report is organized by six major themes:

- Section I. MTSS & Referral/Eligibility for Services
- Section II. Special Education Demographics
- Section III. Achievement of Students with IEPs
- Section IV. Educational Settings for Students with IEPs
- Section V. Teaching & Learning for Students with IEPs
- Section VI. Support for Teaching & Learning

Recommendations are summarized at the end, with detailed provisions for implementation. In addition, an explanation of frequently used terms is in Appendix E.

Throughout this report, references are made to students receiving special education services. They will also be referred to as students with Individualized Education Programs (IEPs) or students with disabilities. The terms are intended to be interchangeable.

Methodology

This review triangulated data from three sources to arrive at integrated findings and recommendations related to programs, policies, and practices, and the implications for student outcomes.

The first component involved the longitudinal analysis of student outcomes, achievement trends, and growth patterns at the elementary, middle, and high school levels (Outcome Analysis). The second component focused on the systemic organizational and program factors that have an impact on program effectiveness and exceptional children student outcomes (Organizational and Program Analysis). The analyses conducted for these two components drew from the third component—the Research and Practice Literature—which identifies the organizational factors, the program elements and practices, and the implementation conditions associated with program effectiveness and positive student outcomes.

Our review approach was multidimensional, emphasized the participation of multiple stakeholders, and involved qualitative data collection approaches.

Components included:

1. An analysis of student outcomes data;
2. Interviews and focus groups with a select sample of District and school personnel;
3. A review of District documents pertinent to the focus of the study.
A critical component of this study was to determine how the Somerville Public Schools’ special education program compares to similar urban districts. We utilized several sources to identify comparable district practice, including our own knowledge of other district’s policies and procedures and publically available information to perform a comparative analysis with like districts.

Population Trends and Outcome Analyses

Student Population and Program Placement Trends
Population and program placement trends are significant equity indicators of the extent to which there is over-representation of any group in the special education population, and they also provide important information about the distribution of the special education population in placements that represent least restrictive environments. Population trends were analyzed to show, where possible, changes over time by grade level/age, disability categories, level of service, and diversity categories (gender, race/ethnicity, and language where the number of students is sufficient to allow analyses), and combinations of variables.

Student Achievement Trends
Student performance data were analyzed to provide a comparative examination of performance by both special and regular education students.

Document Review
PCG reviewed numerous documents and analyzed them for information related to District and school structures, programs, policies and practices. Data and documents reviewed were in the following general categories:

- Quantitative data
- Description of services and activities
- Documents regarding accountability and professional development
- District procedures and guides
- Massachusetts Department of Elementary and Secondary Education Special Education reports

More specific information about data and documents is provided in Appendix B and Appendix C.

Interviews & Focus Groups
Extensive data were acquired through interviews and focus groups with over 100 central office administrators, school level administrators, special education teachers, general education teachers, paraprofessional aides, special education facilitators, school principals, parents, students, Somerville School Committee members, the Somerville Special Education Parent Advisory Council (SSEPAC), and other school-based personnel.

More specifically, central office administrators included the Superintendent of Schools, the Assistant Superintendent, the Director of Elementary Curriculum, the Director of Special Education, the Assistant Director of Special Education, the Director of Student Services and the Finance Director. Focus groups included school principals, special education facilitators, school adjustment counselors, high school department chairs, guidance counselors, the special education administrative assistant, the IT Director, special and general education teachers, teachers in co-teaching classrooms, and paraprofessional aides. PCG also met with an external organizations that provides transportation to the District and the District’s legal counsel.
Student Record Confidentiality

To protect the confidentiality of personally identifiable student information, PCG complied with the Institutional Review Board’s procedures, the Common Rule, the Family Educational Rights and Privacy Act, the Health Insurance Portability Act, and other state, local, and federal rules for the protection of such confidentiality. The company’s Security and Confidentiality Policy for Protected Data is fully described in Appendix A.

Acknowledgements

The Public Consulting Group (PCG) team thanks the many individuals who contributed to this review of SPS’ special education services. Their efforts were critical to our ability to obtain a broad and detailed understanding of the system so that we could present the best possible proposals for improving special education and related services for the District’s students. This review would not have been possible without the contributions of Tony Pierantozzi, Dr. Vince McKay, Mary DiGuardia, Christine Trevisone, Pat Durette, Kenya Avant-Ransome, and John Breslin. They organized the team’s interviews and provided the documents and data we needed in order to do our work.

PCG thanks the many SPS staff members with whom we met. Their dedication to their students, the families and the Somerville community was evident in all of their feedback. The staff at SPS are passionate about supporting all students to ensure they are receiving the best possible services in the District and have built strong, genuine relationships with their students and colleagues. We also thank the SSEPAC, parents and school committee members who provided thoughtful and relevant information. It is abundantly clear that this vibrant, tight-knit community is committed to education and ensuring the diverse learners throughout Somerville are educated to reach their full potential.

Finally, although this report documents areas of concern, PCG acknowledges the many successes and achievements of SPS that are detailed throughout this report. The areas of concern are used to formulate recommendations designed to improve the academic performance and social/emotional outcomes of students with disabilities, who as a group have traditionally lagged behind their very high performing peers. PCG’s goal is to assist the District in taking a series of actions that are challenging but intended to ensure the District can abide by its commitment to Education-Inspiration-Excellence in all its instructional services, departments, and programs.

Members of the PCG Team

Appendix D presents brief biographical sketches of PCG’s team members, who include:

- Anna d’Entremont, PCG Senior Consultant and former COO of a Boston, MA charter school and program officer for an organization supporting 85 new small high schools across New York City
- Dr. Jennifer Meller, PCG Senior Consultant and former Director in Specialized Services for the School District of Philadelphia
- Alexandra Panetta, PCG Business Analyst and Data Analyst
- Annelise Eaton, PCG Business Analyst and Project Support
I. MTSS and Referral/Eligibility for Services

Massachusetts, like many states, has embraced a framework for a tiered system of supports that is responsive to the academic and non-academic needs of all students, including those who may require or currently receive special education services. The Massachusetts Tiered System of Supports (MTSS) provides “a framework for school improvement that focuses on system level change across the classroom, school, and district to meet the academic and non-academic needs of all students, including students with disabilities, English language learners, and students who are academically advanced. It guides both the provision of high-quality core educational experiences in a safe and supportive learning environment for all students and academic and/or non-academic targeted interventions/supports for students who experience difficulties and for students who have already demonstrated mastery of the concept and skills being taught.”¹ This section reviews the effectiveness of the District’s current MTSS framework and its impact on referrals to special education.

District Practices

While the state does not mandate adoption of this framework, it is encouraged and is provided as guidance for best practice. The District is, however, required to develop an annual District Curriculum Accommodation Plan (DCAP).² Somerville references MTSS as their district approach to meeting this plan—and ensuring that the general education program accommodates student’s diverse learning needs and avoids unnecessary referrals to special education. The District began using this approach five years ago, which is prior to the state’s articulated commitment to this framework. The District notes that implementation of an MTSS framework has helped reduce the number of unnecessary placements in special education and resulted in a drop in suspension rates.

The District has an MTSS structure at the elementary level, but has not yet begun fully implementing at the middle and high school levels. As stated by a member of a focus group, MTSS implementation oversight currently “lives somewhere between student services and the principals.” There does not appear to be a single individual at the District level who is accountable for the overall success of the District’s MTSS framework, and as a result, there appears to be implementation inconsistency among schools.

There also appears to be confusion at the building level over the intention of MTSS. References in focus groups were made to “you MTSS a kid,” as if the framework was a verb. As one district administrator noted, “we haven’t reached the point where people understand that MTSS isn’t something you do to kids, but that it is everything that we do as a district.”

The following summarizes additional expressed concerns from focus group participants.

- Some focus group participants were not fully certain about how MTSS differed from the Child Study Team. One noted, “I thought it was the referral process.” Others stated it was simply “the new name for CST, but the process is the same.”
- MTSS is viewed as a roadblock put in place “to curb the number” of students receiving special education services and is a district-imposed mechanism to help “get the numbers down.”

¹ http://www.doe.mass.edu/sped/mtss.html
² Massachusetts General Law, Chapter 71 Section 38 ½ Q and Section 59C. See: https://malegislature.gov/Laws/GeneralLaws/PartII/TitleXII/Chapter71
Many perceive the process—up to a year in some cases— to be time consuming and frustrating for teachers to obtain the support they believe their students need.

MTSS teams vary in quality depending on the leadership of a principal or interested school staff.

Data does not typically drive referral to MTSS, but rather teacher instinct that the student is falling behind.

MTSS teams do not always provide new intervention options, but offer teachers “ideas that match what we are already trying.”

Focus group participants requested a more systematic approach that would support knowledge sharing related to interventions and that would better facilitate the consistent collection of data and progress monitoring. There appears to be a consensus that school personnel would welcome leadership and training, and that SPS students would benefit from the deeper implementation of a comprehensive research-based MTSS framework. Further, they would welcome consistent structures and financial models to support its activities.

Universal Screening

The District appears to have a comprehensive assessment system in place that identifies students at risk of poor performance. The following innovative practices help teachers assess student progress and risk levels:

- Assessment and Reteach meetings are tied to two local formative assessments that give teachers detailed information on student performance.
- The STAR assessment is offered three times per year and provides teachers with a detailed roster of student performance.
- Teachers receive Risk Rosters twice per year that classify students by risk level.
- There are multiple well-regarded reading assessments in place at the elementary level that provide both screening and/or progress monitoring data (MAP, DIBELS, Fountas & Pinnell and Common Formative Assessments).
- Student Support Teams (SST) meet weekly to address attendance, discipline, and students in crisis. Weekly attendance rosters are provided to support these meetings.

Interestingly, focus group participants who we asked did not indicate specifically using these data to drive MTSS referrals.

Interventions

There is concern that SPS schools do not have sufficient research-based interventions for students that are targeted for various areas and intensities of need. Further, there is a perception that general education teachers do not have the tools, training, or expertise to understand how to support their struggling students. This gap is most strongly felt for Tier 2 instruction. Most teachers indicated using interventions “from their own toolbox” rather than research-based ones provided by the District.

Reading intervention is considered strongest in grades 1-3, where the District employs seven reading specialists funded through Title 1 to provide pull out support to students. The District also has a daily 40 minute ‘X block’ period in elementary schools, an innovative model designed to provide targeted intervention and enrichment. ‘X block’ tutors are trained in Tier 2 interventions, where they work with
students in grades 4, 5 and 6. There are no current MTSS formal interventions in place for 7th and 8th grade. Formal kindergarten interventions are also limited. The District recently purchased Early Reading Intervention kits and trained paraprofessionals. The data from this implementation has been promising to date. Currently the only formal math intervention at the elementary level is the NumberWorlds curriculum, which was purchased for special education teachers. The District has not seen the impact hoped for with the curriculum and is now exploring other options for specialized instruction in math.

While a formalized MTSS process does not exist at the high school level, the Redirect program offers a unique opportunity for intervention to address behavior issues early and prevent referrals.

SPS intervention practices as included in the exhibit below.

Exhibit 1.0. SPS Interventions by Grade

<table>
<thead>
<tr>
<th>Name of Intervention</th>
<th>Tier</th>
<th>Description</th>
<th>Grade K</th>
<th>Grades 1-3</th>
<th>Grades 4-5</th>
<th>Grades 6-8</th>
<th>Grades 9-12</th>
</tr>
</thead>
<tbody>
<tr>
<td>Early Reading Intervention</td>
<td>2</td>
<td>Kindergarten Reading Program Program is delivered by paraprofessionals 5 days per week for 20 minutes each session.</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Orton-Gillingham</td>
<td>3</td>
<td>Reading Program Intervention occurs 5 times per week for 30-40 minutes per session.</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Wilson Reading</td>
<td>3</td>
<td>Reading Program Intervention occurs 5 times per week for 30-40 minutes per session. Typically IEP driven</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Fundations</td>
<td>1</td>
<td>Reading Program Intervention occurs 5 times per week for 10-15 minutes per session.</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>NumberWorlds</td>
<td>2</td>
<td>Math Program Mixed results, likely to discontinue use.</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>X block</td>
<td>2</td>
<td>Designated 40 minute period daily for intervention and enrichment</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Afterschool Tutorial Program</td>
<td>2</td>
<td>Research-based program that serves about 350 students</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>IXL software</td>
<td>2</td>
<td>ELA and Math District is currently reviewing efficacy</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Reading Services</td>
<td>2</td>
<td>8 FTEs reading teachers across the 7 elementary schools</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Elementary Summer School</td>
<td>2</td>
<td>Uses an evidence based curriculum. About 250 students attended last year.</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
</tbody>
</table>
Progress Monitoring

While there were anecdotal reports of informal data collection activities for progress monitoring and an acknowledgement by many that the District is becoming more “data-driven,” there does not appear to be a systemic approach for the collection of progress monitoring data. Many focus group participants expressed uncertainty about what they were supposed to be collecting and in what format.

Some schools keep spreadsheets with data showing interventions and student responses. Instead of using school-developed spreadsheets, which are cumbersome and manual, there was an expressed need for a technical solution that is comprehensive and system-wide.

It was noted that Code for America is currently working with the District to develop an app that will take data from across the District into a dashboard and will allow the user to add in student interventions. As described, this app has great potential for solving this gap.

Communication and Consistency

It was reported by multiple focus groups that there is a lack of communication and consistency between schools regarding the MTSS process. Groups stated there were not common processes or forms across schools. School-based focus group participants noted extreme differences in expectations of the MTSS process, and lack of knowledge if a student had received intervention support in another school or in a previous grade. All indicated that that a standard form and additional training would be welcome.

Referral, Evaluation & Qualification for Special Education

A common theme amongst focus group participants pertained to concerns about students who do not appear to be progressing academically and/or have social/emotional needs, and have a possible need for special education services. There was a common perception that the referral process moves slowly to an evaluation. Furthermore, there was the perception among focus group participants that, other than students with obvious disabilities, MTSS simply slows down the evaluation process. Another perspective expressed was that teachers sometimes refer students too quickly for a special education evaluation because a child is not making sufficient progress in comparison to their classroom peers, and they do not feel they have the tools to help the student succeed in the general education classroom.

The following comments are reflective of the range of expressed concerns by focus groups.

- Right now MTSS is “a hoop you go through for a special education referral.”
- Even if a student has gone through the MTSS process with no improvements, a referral does not always proceed quickly to an evaluation.
- MTSS team members “push back” on referrals to provide more interventions and document to demonstrate progress.
Classroom teachers do not always understand that “the lowest performing student in the classroom doesn’t necessarily have a disability.”

The evaluation process proceeds more quickly when a parent has an attorney, when the parent writes a letter, or when the parents engages an advocate. Reportedly, some school staff may encourage parents to request a referral to expedite the process.

There was the strong perception among focus group participants that there are a high number of parent referrals at the high school for special education because MTSS is not in place.

There was a concern that outdated testing materials were not giving MTSS or evaluation teams accurate readings of students’ present academic levels.

All of the concerns expressed by focus group participants concerned students who primarily are struggling with reading, math, writing, social skills, and/or organization. This concern did not extend to students with medically based disabilities that require very intensive support and where there is no disagreement about their eligibility status. Typically, these students receive early intervention services between birth and two years of age, and begin to receive special education services at age three. The former group of students (which comprises the majority of those receiving special education services) are reflective of students with needs that different school districts, different schools within districts, and even personnel within the same school, may disagree about the need for special education services. The bottom line for these students is that school systems must have an effective process in place to determine the instruction/intervention students need, ensure students receive what they need, and demonstrate students are able to show meaningful progress regardless of the funding or programmatic source of instruction/interventions.

It should be noted that in previous years the District did not have a common academic assessment, with staff instead completing different assessments, some of which were outdated. SPS recently purchased the WIAT-3 and the District has focused on training staff. Initial reactions have been positive to the new assessments, which should help to create a more consistent identification process across the District.

**Relationship between MTSS Framework, Section 504 Services, and Special Education**

The following information explains the relationship between the MTSS framework, Section 504 services, and IDEA’s special education services.

**MTSS Framework**

MTSS provides an overall framework for structuring and coordinating the provision of core instruction along with the additional support some students require so that all are successful. The holistic nature of the MTSS framework requires the consideration of all students, including those with Section 504 and IEP plans, and others who are ELL and/or academically advanced.\(^3\)

Under the MTSS framework, core instruction is evidence-based, rigorous and of high quality. By utilizing a universal design for learning, learning differences are considered proactively rather than reactively. The instruction is culturally relevant and linguistically appropriate, and is implemented with integrity for all students. The framework is based on a presumption that some students require additional instruction in order to achieve grade level standards. Increasingly intensive tiers of academic and social/emotional support are targeted to meet student needs based on data-driven problem-solving and decision-making;

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3 See the Council of the Great City School’s document, *Common Core State Standards and Diverse Students: Using Multi-Tiered Systems of Support* that outlines the key components of an integrated, multi-tiered system of instruction, interventions, and academic and behavioral supports needed by school districts in the implementation of the Common Core State Standards. The document is applicable also to school districts in states that have not adopted these standards.
instruction is adjusted to continually improve both student performance and the rate at which it progresses. Furthermore, the process is used to assess (using student responses to the instruction) the effectiveness of the tiered instruction/interventions being implemented.

**Section 504 Services**

Students with Section 504 plans may require instruction/intervention that is provided through one or more of MTSS’s increasingly intensive tiers. At any point during the MTSS process a student may be referred to determine whether he/she has a disability that meets Section 504 criteria.

**Special Education Services**

With effective implementation of the MTSS framework, including the early identification of students when they are first having academic and/or social/emotional difficulties, it is likely that fewer students will present a need for a referral for special education services. In some cases, progress monitoring will provide data to suggest a need for special education.

Under the MTSS framework, special education is not considered to be a separate tier for instruction and intervention. Instead, it is viewed as a service delivery model that is integrated within the tier(s) of instruction/intervention and matched to a student's skill needs. In most cases, the student’s IEP incorporates these interventions, and identifies the personnel and educational setting (general education and/or separate) in which they will be provided. In some cases, the student’s need for interventions will not be related to his/her disability and will be provided as determined by the problem-solving team.

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4 Tiered Instruction and Intervention in a Response-to-Intervention at Model
Graphic Representation

The graphic below reflects how MTSS, Section 504 services and special education services intersect.

Exhibit 1.1 Multi-Tiered System of Support (MTSS)

Multi-Tiered System of Support (MTSS)

**Tier 3: Intensive Interventions & Supports**
- The most intense (increased time, narrowed focus, reduced groups size) instruction and intervention based on individual and small group student needs provided in addition to and aligned with Tier 1 & 2 academic and behavior instruction and support.

**Tier 2: Targeted, Supplemental Interventions & Support**
- More targeted instruction/intervention and supplemental support in addition to and aligned with the core academic and behavior curriculum.

**Tier 1: Core, Universal Instruction & Support**
- General academic/behavior instruction and support provided to all students in all settings.

District Practices

Many of the concerns expressed by focus group participants pertain to issues relating to lack of clarity over the District’s MTSS model. The MTSS-related recommendations included at the end of this report are designed to improve achievement, address the social/emotional needs of all students, and ensure that needs are met for students not eligible for special education services.

Even if MTSS is implemented as intended, however, there will be students who do not respond with meaningful progress within a reasonable period of time. It does not appear that the District makes detailed mention of MTSS on their website, or how it might be used toward a referral to special education. The District does include a step by step process for the roles and responsibilities of both facilitators and team meeting chairs in the Evaluation process, and includes PDFs of all relevant forms. What it does not do, however, is demystify the process for parents who may be encountering special education for the first
time. Additionally, the District does not appear to have documentation publicly available to clarify criteria for various disability areas to support reasonable expectations and understanding of these terms and processes. This documentation could include the extent to which MTSS is used to supplement or supplant a discrepancy model for determining the existence of a specific learning disability or other disability area, criteria for eligibility, work flow, expected timelines, etc.

**Timely Evaluations**

Based on ESE data from the 2012-13 school year, 100% of SPS students were evaluated by mandated timelines. SPS was unable to provide evaluation data for the 2013-14 school year. PCG recommends that SPS implement a system to capture referral and evaluation data, in an effort to track referral sources, monitor timeliness of evaluations, and ensure data accuracy for state indicators.

**Dually Identified Students (ELL/SPED)**

In a recent Department of Justice (DOJ) Audit, the strongest finding was around ELLs with disabilities, also referred to as dually identified students. Focus group participants noted there is the tendency in the District for dually identified students to be long-term ELLs, and often the highest need students. While this concern has been a challenge, the DOJ audit has reportedly resulted in improved identification, parent notification and processes. MTSS has helped improve the identification of dually identified students.

Some concerns expressed by focus group participants include:

- There is the need to collaborate better on new arrivals.
- ELL students are overly identified in particular disability categories. PCG addresses this concern in a later section.
- There is the belief that dually identified students are underrepresented at high school.
- ESL teachers report often not being invited to IEP team meetings.
- Testing ELLs with an interpreter (versus through a bilingual staff person) is difficult and may lead to testing error.

There have been recent efforts for increased communication between the departments. The Special Education Director and the ELL Director report being in constant communication and serve on a number of committees together. There have been recent trainings between the liaisons and ELL teachers that were considered to be highly effective. This District also instituted a working group at East Somerville Community School for dually identified students that is reported as a successful practice. Teachers in the building participate with the school principal and both directors. It gives the message that administrators are part of the culture shift. Teachers are finding that there are common strategies for both teaching ELLs and students with disabilities.

**Section 504 Eligibility**

Overall 2.5% of students or 124 students at Somerville Public Schools have a 504 Plan. As noted in the chart below, the number of 504 plans by school varies greatly.
While some variance may be attributed to the specific programs at each school, grade levels, and populations served, the District should consider reviewing current plans as well as standard process and criteria to ensure consistency of services.

- For the relatively small size of the Brown School, there was an extremely high rate of 504 Plans. Over 9% of students at the Brown had a 504 Plan, which is more than triple the average rate in SPS.

- The Kennedy, Winter Hill, and East Somerville Community School all had relatively low percentages of students with 504 Plans.

Additionally, some focus groups participants noted the perception that some students received 504 Plans when they were found ineligible for IEP services. Focus group participants also indicated the need for more training and information on 504 Plans for both staff and families.
II. Special Education Demographics

This section provides a context for special education programming by reporting special education prevalence rates based on various subgroups of students, including those from a racial/ethnic group, or those that are English Language Learners (ELL) and identified as needing special educations services.

Based on 2012-13 data, 21.2% of SPS students ages 3-21 have an IEP, compared to 17% of those in the state and 13.1% in the nation. The following discussion addresses data pertaining to the overall percentage of students with IEPs based on total student enrollment and disability area, comparisons to state and national data, and composition by race/ethnicity. This information provides an overall context for understanding the disparate characteristics of students who receive special education services.

Overall Rates for Students with Disabilities

Overall, 21.3% of SPS students have an IEP for the 2014-15 school year. As reflected in Chart 2.0, this rate has remained about the same since the 2010-11 school year, with small fluctuations between 21 and 21.7% over the past five years. It also represents a more significant decrease from the 2006-07 school year when the rate of SPS students with IEPs was 24%. However, SPS’s incidence rate is still higher than the state at (17.2 %).

Chart 2.0. Percentage of SPS Students with IEPs Compared to State Incidence Rates, 2010-11 to 2014-15

![Chart 2.0](image)

SPS IEP Rates Compared to Comparable School Districts

Compared to 8 similar urban school districts in Massachusetts, SPS’s state reported rate for the 2013-14 school year was 21%, which was smaller than Salem’s 21.7% and larger than the remaining seven districts.

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(Everett’s 14.6%, Revere’s 14.9%, Medford’s 18.5%, Chelsea’s 12.7%, Brockton’s 13.2%, Fall River’s 20.4%, and Haverhill’s 20.4%).

Chart 2.1. SPS IEP Rates Compared to Other Massachusetts School Districts, 2013-14

Overall Incidence Rates and by Primary Disability Area

Compared to the state and nation, SPS has a significantly higher communication rate (26.4%) than the state’s 17.6% and nation’s 21.1%. The District’s emotional disability rate (9.4%) is higher than the state’s 8.7% and the nation’s 5.6%. The SPS developmental delay rate (10.81%) is marginally higher than the state’s 10.78% and significantly higher than the nation’s 6.2%.

While SPS’s specific learning disability rate (31.6%) is lower than the nation’s (35.4%), it is higher than the state’s rate of 27.9%. SPS has a lower rate of autism (6.99%), health (4.6%), intellectual (5.7%), and sensory disabilities (0.9%) than both the state and the nation.
Chart 2.2. Percentage of SPS Students by Disability Area Compared to State and Nation, 2014-15

Overall Incidence Rates by Race/Ethnicity

The information below reflects data for SPS students who receive special education services, by race/ethnicity, to consider the extent to which there is disproportionality.

Chart 2.3. Percent of Students with IEPs by Race/Ethnicity, 2014-15

The distribution of race/ethnicity for all students in SPS roughly matches the distribution of students with IEPs for students of Multiple Ethnicities, White students, and Latino students. Of the total population,

7 The area of “other” incorporates the following disability areas: sensory, physical, neurological, and multiple disabilities
students of Multiple Ethnicities represent 2%, Latino students represent 41%, and White students represent 36%.

As is evidenced in chart 2.3 above, Asian students represent only 5% of all students in special education, which is less than the 9% representation of Asian students district-wide. 14% of all students with IEPs are Black, while they represent only 11% of the entire student population in Somerville.

During the 2014-15 school year, 22% of all SPS students had an IEP. As seen in Chart 2.4 below only 11.5% of all Asian students in SPS had an IEP. In comparison nearly 28% of all Black students have an IEP.

Chart 2.4 Percent of Students with IEPs Compared to Students without IEPs by Race/Ethnicity, 2014-15
Of students with autism, 56.2% are White. White students also account for 56% of students with Health impairments. Latino students represent 56% of students with communication disabilities and almost half of those with an intellectual disability. Black students represent a quarter of those with an intellectual disability.

**State Performance Plan Indicators by Race/Ethnicity**

The Massachusetts Department of Elementary and Secondary Education measures disproportionate representation, i.e., over-identification/under-identification, by computing a weighted or alternate risk ratio and examining the appropriateness of the district’s special education policies, procedures and practices. This allows the Department to determine whether the percentage of students of a given subgroup in special education was the result of inappropriate identification. Based on 2013 data, SPS was found to be in compliance with Indicator 9, Disproportionate Representation in Special Education.

**Overall Incidence Rates for ELL Students**

Overall, 835 SPS students are English Language Learners. Of these, 148 students, or 21.5%, have an IEP. Over half (60%) of ELL students with IEPs are categorized as having a communication disability. Of the remaining students, nearly 16% have a specific learning disability, 12% have a developmental delay, 5.5% have an intellectual disability, and the remaining 6.8% in the other category have either autism, emotional, health, or neurological disabilities.

The disability composition of ELL students varies in some areas compared to all SPS students with IEPs. Of particular note, communication disability rates amongst ELLs (60%) is more than double the District’s overall rate of 26.4%. The rates for a specific learning disability amongst ELLs is less than the district rate; only 17% of ELL students with IEPs have a specific learning disability, compared to 31.6% of all SPS students with IEPs.

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8 The area of “other” incorporates the following disability areas: sensory, physical, neurological, and multiple disabilities
As is displayed in the chart above, the number of ELL students with IEPs declines drastically between early elementary school and high school. While 32 grade 3 ELL students have an IEP, only 10 ELL students in grades 9-12 combined have an IEP. The chart below shows the percentage of ELL students with an IEP, which interestingly spikes in grade 3 and then again upon entry into middle school.
The number of students receiving special education services varies by grade level. As reflected in the following exhibit, the number of students with IEPs increases between kindergarten (74 students) and 6th grade (99 students). The number of students with IEPs decreases after 6th grade. Aside from a small spike in 9th grade, the number of students with IEPs decreases steadily through 12th grade.
Students by Disability Type and Grade

The data show that every grade has students with autism and communication disabilities. The data also show a rise in emotional and specific learning disabilities starting in grade 5, and a drop in autism rates in the middle and high school years.

Chart 2.10. Students by Disability Type and Grade, 2014-15

<table>
<thead>
<tr>
<th>Grade</th>
<th>Autism</th>
<th>Communication</th>
<th>Developmental Delay</th>
<th>Emotional</th>
<th>Health</th>
<th>Intellectual</th>
<th>Specific Learning Disability</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>PK</td>
<td>22</td>
<td>43</td>
<td>24</td>
<td>+</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>+</td>
</tr>
<tr>
<td>Gr. K-5</td>
<td>41</td>
<td>192</td>
<td>79</td>
<td>21</td>
<td>13</td>
<td>15</td>
<td>96</td>
<td>24</td>
</tr>
<tr>
<td>Gr. 6-8</td>
<td>11</td>
<td>55</td>
<td>-</td>
<td>24</td>
<td>18</td>
<td>15</td>
<td>116</td>
<td>11</td>
</tr>
<tr>
<td>Gr. 9-12</td>
<td>18</td>
<td>28</td>
<td>-</td>
<td>36</td>
<td>20</td>
<td>25</td>
<td>129</td>
<td>11</td>
</tr>
</tbody>
</table>

+ Data suppressed due to low N

The chart below displays a significant decline in communication disabilities and a significant rise in specific learning disability beginning in grade 3. Specific learning disability rates rise steadily through grade 6 and then gradually decline. Communication disabilities decline nearly every year between grade 2 and grade 12.

Chart 2.11. Number of Students with Communication vs. Specific Learning Disabilities by Grade, 2014-15
Overall Incidence Rates by Gender

Overall, 67% of all SPS students with IEPs are male and 33% are female. These percentages are equivalent to the national data, wherein roughly two-thirds of students served under IDEA are boys (67%)\(^9\).

Chart 2.11. Percent of Male vs. Female Students with IEPs, 2014-15

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III. Achievement of Students with IEPs

The United States Department of Education (USED) has established State Performance Plan (SPP) requirements that includes 20 indicators. Based on requirements set by USED, each state is required to develop annual targets and monitor school district performance on each indicator. Of the 20 indicators, 15 are applicable to school districts and the remaining 5 are applicable to states. Of the 15 district indicators, 6 are considered to be “compliance” in nature: suspension/expulsion, racial/ethnic disproportionality for special education overall and for 6 disability areas; timely evaluations; preschool timely services; and transition services. The remaining indicators are considered to be “performance or results driven” in nature, e.g., high school graduation; high school dropout; statewide assessment performance; etc. States are required to make an annual “compliance” determination for each district and take enforcement action, if necessary, based on specific IDEA provisions.

USED has been criticized in past years that the state performance plan indicators are heavily focused on compliance, and have limited focus on results for students with disabilities. In 2013, the federal Office of Special Education Programs (OSEP) announced its intention to change this practice and to include test scores, graduation rates, and post-school outcomes as the basis of the new “Results-Driven Accountability (RDA)” structure. The intent of RDA is to strike a balance between the focus on improved results and functional outcomes for students with disabilities, while still considering compliance requirements of IDEA. RDA is designed to be transparent and understandable and to drive the improved academic and functional achievement for students with IEPs.

For the 2014 determinations, OSEP used results data on the participation of children with disabilities on regular statewide assessments; the proficiency gap between children with disabilities and all children on regular statewide assessments; and the performance of children with disabilities on the National Assessment of Educational Progress (NAEP). In the future, OSEP plans to use only regular statewide assessment data, rather than NAEP data, for annual determinations, including data on the growth in proficiency of children with disabilities on statewide assessments; this will occur after states have transitioned to college- and career-ready standards and assessments.

In the following sections, achievement data are analyzed, specifically regarding the performance of SPS’s school-aged students with IEPs on statewide assessments, along with graduation and dropout rates. In addition, data are reviewed for the areas of suspension and attendance, as they have an impact on student achievement. These data take on additional importance now that OSEP has moved to an RDA framework, as there are points associated with both a “Part B Compliance Matrix” and a “Part B Results Driven Accountability Matrix.” Taken together, these scores constitute an RDA Determination and conclude whether districts and, ultimately, states meet IDEA requirements.

Performance of School-Aged Students on Statewide Assessments

The next area of achievement for students with IEPs that was reviewed pertains to student achievement on statewide assessments in reading and in math. In SPS, nearly all students with IEPs in tested grades participate in the MCAS. Data comparing the performance of SPS students with IEPs to those without IEPs reveals a significant achievement gap. The District has recognized this gap in student performance.

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10 Massachusetts was determined as a “Meets Requirements” state, as cited on their 2014 SPP/APR letters: http://www2.ed.gov/fund/data/report/idea/sppapr.html. A state’s 2014 RDA Determination is Meets Requirements if the RDA percentage is at least 80%, unless OSEP has imposed special conditions on the state’s last three IDEA Part B grants.

11 The Massachusetts Comprehensive Assessment System (MCAS) is the state’s standardized test beginning in Grade 3.
and has identified it as a top priority for improvement. The state has also echoed this statement for statewide performance and has made the achievement gap among subgroups a priority focus.

**Percentage of SPS Students with IEPs Compared to those without IEPs Meeting Reading Standards**

Chart 3.0 below reflects the percentage of SPS students with IEPs compared to SPS students without IEPs meeting standards in the 2013-14 school year. Generally, these data show that a higher percentage of students with IEPs meet standards in the 8th grade (38%) and 10th grade (52%) for reading than in earlier grades. However, the data also show significant achievement gaps between students with IEPs and their traditional peers in every grade. In grades 3-6, less than 20% of students with IEPs are scoring advanced or proficient on the MCAS state assessment.

**Chart 3.0. Reading: Percentage of SPS Students with/without IEPs, 2013-14 (Proficient/Advanced Proficient)**

![Chart 3.0. Reading: Percentage of SPS Students with/without IEPs, 2013-14 (Proficient/Advanced Proficient)](image)

<table>
<thead>
<tr>
<th>Grade</th>
<th>All Students</th>
<th>With IEPS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gr. 3</td>
<td>68%</td>
<td>19%</td>
</tr>
<tr>
<td>Gr. 4</td>
<td>42%</td>
<td>14%</td>
</tr>
<tr>
<td>Gr. 5</td>
<td>56%</td>
<td>18%</td>
</tr>
<tr>
<td>Gr. 6</td>
<td>56%</td>
<td>14%</td>
</tr>
<tr>
<td>Gr. 7</td>
<td>64%</td>
<td>25%</td>
</tr>
<tr>
<td>Gr. 8</td>
<td>73%</td>
<td>38%</td>
</tr>
<tr>
<td>Gr. 10</td>
<td>81%</td>
<td>52%</td>
</tr>
</tbody>
</table>

**Reading: Achievement of SPS Students with IEPs & Peers Statewide**

In every tested grade, the special education subgroup statewide outperformed SPS special education students. While this trend mimics SPS’s general performance data compared to the state in reading, the achievement gap for special education students should not be overlooked. Compared to the state performance of students with IEPs, Somerville performed 12 percentage points below the state in grade 6. In grade 5 and grade 10, SPS performed 6 and 11 percentage points, respectively, below the Massachusetts state average for students with IEPs. In grades 4 and 8, SPS students with IEPs only performed one percentage point below their state peers.
Chart 3.1. Reading: Percentages of SPS & State Students with IEPs Meeting State Reading Standards, 2013-14 (Proficient/Advanced)

Chart 3.2. Median Student Growth Percentile (SGP) over time for SPS & State Students with IEPs in English Language Arts
Percentage of SPS Students with IEPs Compared to Those without IEPs Meeting Math Standards

Chart 3.3 below reflects the percentage of students with IEPs compared to those without IEPs meeting standards in the 2013-14 school year. These data show a significant achievement gap at all grades but that at the 3rd, 4th, and 10th grades students perform at nearly the same level as their peers with IEPs statewide. Grade 4 is the only year with a proficiency gap below 30 points (at 25 points); all other years demonstrate a difference in achievement between students with IEPs and all students at between 30 and 42 percentage points. At grades 7 and 8, less than 5% of students with IEPs were proficient in math. At grade 10, students with IEPs lagged behind their peers with a gap of 36 points.

Math: Achievement of SPS Students with IEPs & Peers Statewide

At all grades, the state outperformed SPS special education students in the special education subgroup. The percentage of SPS 3rd graders meeting standards (18%) was 17 percentage points below students with IEPs statewide. The next largest gap was for SPS 8th graders who scored 10 points below the subgroup statewide. The smallest achievement gap was at 4th grade where the percentage of SPS students meeting standards was only 1 point below students with IEPs statewide.
Chart 3.4. Math Percentages of SPS & State Students with IEPs Meeting State Math Standards, 2013-14 (Proficient and Advanced Proficient)

Chart 3.5. Median Student Growth Percentile (SGP) over time for SPS & State Students with IEPs in Mathematics
Graduation Rates of SPS Students with Disabilities

In 2013, SPS had an 82.1% 4 year graduation rate for all students. In contrast, there was only a 59.2% graduation rate for students with IEPs, which represents a 22.9 point gap. While this gap is almost identical to the variance statewide, SPS graduated a lower percent of students than the state for both students with IEPs and students without IEPs.

Chart 3.6. Percent of SPS and MA Students with IEPs Graduating from High School, 2012-13

Graduation Rates of SPS Students Compared to Other Massachusetts Districts

None of the comparable Massachusetts districts met the state’s 80% graduation target for students with IEPs in 2013. Only Medford and Salem graduated a higher percentage of students with IEPs than Somerville with 71.6% and 76.9% respectively. Everett and Revere perform closest to Somerville with 58.2% and 58.0%. Fall River, Brockton and Chelsea graduated the lowest percentage of students with IEPs.

Chart 3.7. Percent of Students with IEPs at SPS and Comparable Districts Graduating from High School, 2012-13
Dropout Rates

SPS Dropout Rates Compared to the State for Students with IEPs

According to the Special Education Results Report published by ESE, Somerville has a higher dropout rate than both the state average and state target with 4.9% of SPS students in special education dropping out. This rate is 1.8% higher than the dropout rate of SPS general education students.

Chart 3.8. Dropout Rate of Students with IEPs Compared to Students without IEPs, 2012-13

SPS Graduation Rates Compared to other MA Districts

Amongst similar urban districts, SPS falls in the middle with regard to dropout rate. Fall River (9.5%) and Brockton (6.8%) have the highest dropout rates for students with IEPs, followed by Somerville (4.9%) and Revere (4.1%). Chelsea and Everett are reported as having a zero percent dropout rate for students with IEPs.

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Attendance

Attendance can be considered a proxy for student engagement, and Somerville’s attendance rates for both students with and without IEPs is strong for an urban district. In the 2014-15 school year, the average daily attendance rate for students without IEPs has been 95.6% (to date); students with IEPs had only a slightly lower rate with 93.7% average daily attendance. District schools follow a similar pattern.
Suspensions

Of the students suspended in the 2013-2014 school year, about half were students with disabilities. This rate is also reflective when calculating the total number of days suspended for students with IEPs compared to all students. A third of all students suspended 10 or more days were students with IEPs. Of the total students suspended, 37% were from Somerville High School and 18% were at the Kennedy School. Only 30% of the students suspended at Somerville High School had IEPs, meanwhile 60% of the students suspended at Kennedy had IEPs. Of the 77 students who attended Full Circle/Next Wave during the 2013-14 school year, 55 students were suspended and 40 of those students had IEPs. Of the total 115 district suspensions for students with IEPs, almost 35% were from the Full Circle and Next Wave programs. Additionally, these programs account for 67% of the students with IEPs suspended for 6-10 days.

Chart 3.11. Suspensions at SPS for Students with IEPs, 2013-14

At 2.7%, SPS has a higher in school suspension rate for all students than that of the state at 2.1%, as seen in Chart 3.12 below. Though SPS’s in school suspension rate of SPS students with disabilities (3.3%) is lower than the state’s rate of 3.8%, it is still higher than the overall rates of all students at both the state and the District.

When compared to similar urban districts, SPS had a lower rate of students with disabilities receiving in school suspensions than four of the comparable districts (Brockton, Everett, Fall River, and Salem).

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13 Kennedy School suspension numbers include the SEEK and SKIP programs.
14 Includes all suspensions in CPR Report from SPS, including 0 days.
Chart 3.12. Percentage of Students with at least One In-School Suspension Compared to Other Massachusetts School Districts, 2013-2014

SPS’s rate of students with disabilities receiving out of school suspensions is 8.9%. This rate is 1.2 percentage points higher than the state’s rate of 7.7%.

When compared to similar urban districts, SPS had a lower rate of students with disabilities receiving out of school suspensions than four of the comparable districts (Brockton, Chelsea, Everett, and Fall River).

Chart 3.13. Percentage of Students with at least One Out-of-School Suspension Compared to Other Massachusetts School Districts, 2013-2014
IV. Educational Settings for Students with IEPs

The data in this section reflect the educational settings of SPS school-aged students overall, by disability areas, ELLs, and race/ethnicity. In addition, District data are compared to state and national data, and State Performance Plan targets. Analysis related to the instructional implications of placement practices is found in Section V. Teaching & Learning for Students with IEPs.

Overall Educational Settings for SPS, State & Nation

Longitudinal data show that SPS students with IEPs are educated for slightly more time in the general education setting than the state target. However, the District has higher percentages of students in substantially separate classes and in separate settings than the state target.

- **Regular Ed Class more than 80% of time.** SPS’s 2013-14 rate of 63.2% is higher than the state target of 59.7% and demonstrates an increase over the prior year’s rate of 62.1%.

- **Regular Ed Class less than 40% of time.** The District’s 16.6% rate of students in general education less than 40% of the time is over two points higher than the state target. The District’s 2013-14 data is almost the same as the prior year. However, this rate is 1.7% higher than data from the 2011-12 school year.

- **Separate Settings.** For 2013-14, SPS’s rate of students educated in separate settings (13.3%) is more than double the state target of 5.5%, a 7.8 percentage point difference.

Chart 4.0. Percentage of Students by Educational Setting for SPS & State SPP Target, 2011-12 to 2013-14

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15 Substantially Separate is defined in MA as 40% of less time spent in general education.
16 Somerville Special Education Data: http://profiles.doe.mass.edu/gis/sped_map.aspx?orgcode=02740000&fycode=2013
17 MA ESE data by Education Settings, http://www.doe.mass.edu/infoservices/reports/enroll/default.html?yr=sped1314
Comparable School Districts: Percentage of Students in General Education Setting by Time

Chart 4.1 reflects the percent of students with IEPs in general education classes by the three periods of time monitored by USED’s Office of Special Education Programs and MA ESE.

- **General Ed Class 80+% of Time.** The percentage of students in SPS that spend at least 80% of their time in the general education setting was higher than any of the districts benchmarked. Brockton and Revere were very close to Somerville at 63.1% and 62.7% respectively. Medford and Fall River only had 50.3% and 55.2% of their students with IEPs spending at least 80% of their time in the general education classroom.

- **General Ed Class Less than 40% of Time.** In SPS, 16.6% of special education students spend their time in this setting, with 0-39% of instructional time spent alongside non-disabled peers. Of the comparable districts, SPS fell in the middle of the range. Districts like Brockton and Fall River had over 25% of students in substantially separate environments, while Everett only had 8% in this category.

- **Separate Settings.** SPS has 13.3% of students in separate settings\(^{18}\) which is the second highest across all the districts benchmarked, following Chelsea at 16.2%. Brockton and Everett only have 5.6% and 6.8% of students in separate settings.

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\(^{18}\) Includes students in the Public Separate programs, Next Wave and Full Circle
Educational Setting by Disability Area

The composition of students with IEPs varies considerably by primary disability. Highlights of data reflected in Chart 4.2 are summarized below. More detailed information is provided in Chart 4.3 and 4.4.

- **Least Restrictive.** 79.6% of students with a specific learning disability, 72% of students with communications disabilities, and 60.5% of students with health impairments are educated in the general education setting at least 80% of the time.

- **More Restrictive.** Disability areas that are educated in more restrictive classes (less than 40% in general education) are developmental delay (46.1%), autism (46.8%), intellectual (44.8%), and other (22%)\(^{19}\). Additionally, 37.5% of students with an emotional disability and 30.4% of students with autism were educated in separate settings.\(^{20}\)

### Chart 4.2. Percentage of SPS Students by Disability Area & Educational Setting, 2014-15

Across these three disability types, the District is generally aligned with state and national averages for students in the least restrictive environment (greater than 80% in general education). However, SPS rates surpass state and national rates for students served in separate settings.

- **Specific Learning Disability.** Almost 80% of SLD students are educated inclusively compared to the state (73.5%) and nation (66.2%). Yet, 5.9% of SPS students with SLD are educated in separate settings compared to 1.5% statewide and 1.9% across the nation. Additionally, SPS is well below the state and nation for students being educated in partial inclusion (40-79% of the time in general education).

- **Health Impairments.** The District’s 60.8% rate for educating students with health impairments inclusively is less than the state’s 76.4% and slightly less than the nation (63.5%). Compared to

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\(^{19}\) Other disability types include: Multiple Disabilities, Neurological, Physical, Sensory/Hearing, and Sensory/Vision disabilities

\(^{20}\) Includes out of district placements and New Wave and Full Circle
the 2.9% of students in the state and 3.8% nationally educated in a separate setting, SPS has just over 21% in this restrictive environment.

- **Emotional/Behavioral Disability.** SPS has a significant number of students with EBD being educated in a separate setting, at 37.5%. This is over 10 points above the state average (26.9%) and is almost 20 percentage points higher than the nation (18.2%).

**Chart 4.3. Percentage of Students with SLD, OHI, & EBD by Time in General Education Classes**

<table>
<thead>
<tr>
<th></th>
<th>SPS</th>
<th>State</th>
<th>Nation</th>
<th>SPS</th>
<th>State</th>
<th>Nation</th>
<th>SPS</th>
<th>State</th>
<th>Nation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Specific Learning Disability</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Separate Setting</td>
<td>5.9%</td>
<td>1.5%</td>
<td>1.9%</td>
<td>21.6%</td>
<td>2.9%</td>
<td>3.8%</td>
<td>37.5%</td>
<td>26.9%</td>
<td>18.2%</td>
</tr>
<tr>
<td>Less than 40% in Regular Ed</td>
<td>5.9%</td>
<td>5.4%</td>
<td>6.8%</td>
<td>13.7%</td>
<td>5.7%</td>
<td>10.0%</td>
<td>18.8%</td>
<td>20.0%</td>
<td>20.6%</td>
</tr>
<tr>
<td>Between 40% to 79% in Regular Ed</td>
<td>8.6%</td>
<td>19.6%</td>
<td>25.1%</td>
<td>3.9%</td>
<td>15.0%</td>
<td>22.7%</td>
<td>2.5%</td>
<td>11.5%</td>
<td>18.0%</td>
</tr>
<tr>
<td>80% or more in Regular Ed</td>
<td>79.6%</td>
<td>73.5%</td>
<td>66.2%</td>
<td>60.8%</td>
<td>76.4%</td>
<td>63.5%</td>
<td>41.3%</td>
<td>41.7%</td>
<td>43.2%</td>
</tr>
</tbody>
</table>

**SPS, State & National Educational Settings by Autism and Intellectual Disability**

The District’s educational setting compositions for students with autism and an intellectual disability are summarized below:

- **Autism.** For the area of autism, the 20.3% of SPS students educated inclusively is lower than both the state’s 39.8% and the nation’s 39.0%. SPS also has a much higher percentage of students with autism being educated in separate settings (30.4%) compared to the state (15.4%) or nation (9.1%), as well as more students spending less than 40% of their time in regular education.

- **Intellectual Disability.** SPS educates 13.8% of students with an intellectual disability inclusively, compared to 12.5% at the state level and 17.0% at the national level. A higher percentage are educated in separate settings (19.0%) compared to the state’s 7.8% and nation’s 7.4%. Additionally compared to the state and nation, SPS has more students in general education less than 40% of the time, and more students in partial inclusion settings.

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21 Sources:
SPS Data, 2014-15
MA ESE, data by Education Settings, [http://www.doe.mass.edu/infoservices/reports/enroll/default.html?yr=sped1314](http://www.doe.mass.edu/infoservices/reports/enroll/default.html?yr=sped1314)
Chart 4.4. Percentage of Students with Autism and Intellectual Disability by Time in General Education Classes (80+% & 79-40%)

Separate Settings

In the 2014-15 school year, SPS placed 136 students in separate settings, including 50 students with IEPs at the SPS public alternative programs of Next Wave and Full Circle and 86 students in out of district placements. The largest group of students in separate settings (22%) were students with an emotional/behavioral disability, while students with autism represented another 18%.

Chart 4.5. Percent of Students with IEPs in Separate Settings, 2014-15

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22 Sources: ibid
23 SPS data includes students in out of district placements.
24 Includes Next Wave/ Full Circle
Educational Settings by Race/Ethnicity

Latino, White, and Asian students with IEPs are more often educated in an inclusive setting with 61.0%, 60.9%, and 58.7% respectively receiving education greater than 80% of the time in general education. Black students and students with multiple ethnicities have a slightly lower percentage in the fully inclusive setting at 56.4% and 52.6% respectively. Students with multiple ethnicities (27.6%), Asian students (21.7%), and White students (17.7%) are educated in separate settings more than their Black (12.1%) and Latino (10.2%) peers. Additionally, Black and Latino students have a slightly higher rate of being educated in substantially separate environments (less than 40% of the time in general education) with 23.5% and 22.6% respectively, compared to the District average of 19.6%.

Chart 4.6. Percentage of SPS Students by Race/Ethnicity & Educational Setting, 2014-15
V. Teaching & Learning for Students with IEPs

This section provides information related to SPS’s teaching and learning practices for students with IEPs and addresses recommendations to improve student achievement and functional outcomes. Massachusetts’s alignment of its Curriculum Frameworks to the Common Core State Standards (CCSS) provides a historic opportunity to improve access to rigorous academic content standards for students with IEPs, and serves as the centerpiece for considering current SPS special education practices and recommendations for improvement.

Supporting Instruction and Inclusion in the General Education Setting

For students with disabilities to improve their academic achievement and reduce the achievement gap with their nondisabled peers, they need to be involved in the core curriculum and receive evidence-based interventions that are targeted and implemented with fidelity. As discussed earlier, SPS has inclusion rates that exceed state and national averages. However, SPS schools vary with respect to the extent to which students are educated in general education classes, and the extent to which special and general educators co-teach to educate these students. The variance ranges from a very high degree of inclusivity where almost all students are educated within general education classes to very little inclusiveness.

Overall, focus group participants recognized the value of including students with IEPs in general education learning. There is a consensus that SPS is committed to inclusive educational opportunities for students. There also seems to be a growing recognition that general education classes provide the best setting for almost all students with IEPs to receive instruction in the core curriculum. Both special education and general education focus group participants echoed this mindset.

Feedback from focus group participants was mixed regarding the extent to which students are provided access to general education classes, and the sufficiency of support teachers and students are provided. As with most school districts, there are schools that are viewed as being highly inclusive and supportive and those that are not. Participants agreed that principals set the tone for the extent to which their schools practice effective inclusive practices. There was a consensus that general and special educators need more guidance and training regarding the provision of instruction that is rigorous and aligned to the CCSS in a way that enables students with IEPs to learn the material and to demonstrate what they have learned.

District administrators note that the “District has talked about inclusion for years” and that it has been both “a strength and a challenge area.” Inclusion training was performed in the District by a national expert this year, and there are plans to bring this individual back to spend time in classrooms and to give recommendations and/or model for teachers. Based on classroom observations performed by PCG, this training would be an invaluable investment.

Collaboration

There was disparity between focus group teachers who were able to find time to collaborate with other teachers and those who were not able to find such time. There was a consensus, however, that when teachers are able to collaborate and co-plan, co-teaching and inclusive instruction is much more effective. With collaboration, co-teachers were able to change leads for instruction, communicate about student needs, plan lessons, review assessment results, etc. At least some administrative support was viewed as

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25 IDEA regulation at 34 CFR 300.320
a critical component of this process. Without such planning time, it was reported that educators resort to less effective email communication or even Facebook; special educators are unaware of general education class lessons; and general/special educators may have different understandings of instructional purposes, assessment results, etc.

Few participants indicated having scheduled common planning time with their co-teaching partners. Those that did believed it was by happenstance, and not an intentional scheduling decision. All noted a desire to have this time to work together.

Inclusion at the Elementary/Middle Schools

Scheduling and staffing configurations seem to hinder the impact of inclusion at the elementary level. A number of inclusion specialists reported serving 3 or more grades, with ranges as large as 1st to 5th grade. Focus group respondents described running from class to class to service a diverse group of students, but having no real connection to the student’s classroom. One general educator noted that with meeting obligations for special educators, “a week or more can pass” before she sees her inclusion specialists again. One focus group participant stated that inclusion classes in the middle schools grades at his school did not have access to a special educator, even though these students would have had that support in earlier grades and then again likely in a team taught setting in high school. A number of focus group participants wanted clarity as to why some inclusion classrooms had special educators assigned to them, while others had paraprofessionals.

Two schools have adopted more innovative scheduling practices in their buildings to help remedy some of these concerns. At the Winter Hill School, for example, inclusion specialists serve bands of only two grades at a time (i.e., 1st-2nd, 3rd-4th, etc). Inclusion specialists reported having more time to plan, to learn the curriculum, to actively participate in instruction and to get to know their students. This schedule required the school to hire an additional special educator than had been previously allocated to support the model.

The District has strong integrated PK and kindergarten programs. PCG was able to observe a number of these classrooms and saw quality instructional experiences for students. However, because there is not an integrated 1st grade and inclusion supports at this grade are more limited, some focus group respondents believe they are now forced to move students who attended an inclusive Kindergarten program and were demonstrating success into a more restrictive environment. It is believed that a model like an integrated 1st grade would benefit a number of students.

Co-teaching at the High School

Inclusion at the high school follows a more traditional co-teaching approach. Academic courses coded “College Prep with Support” have both a general educator and a special educator who collaboratively teach the course. PCG interviewed co-teaching teams who had an overwhelmingly positive perception of co-teaching and its impact on both their practice and its outcomes for students. Feedback included:

- “Without a co-teacher, there are so many little things that the special education teacher knows to do that aren’t on the regular education teacher’s mind.”
- “The special education teacher knows how to do scaffolding and supports that make a huge difference for students.”
- “She taught me how to organize the classroom differently to make it more accessible.”
- “We’ve raised the bar on what we expect from the kids.”
- “Students can learn how to be professionals by seeing how we interact.”
Study of Somerville Public Schools Special Education Services

- “It’s nice to have support as a teacher.”
- “We never have a sub so there’s consistency for students.”
- “Common planning time is difficult because everybody teaches other things.”
- “You are just told you’re a partner and go for it. There wasn’t training in teams.”
- “When co-teaching was a new model, we got some PD but we could use more.”
- “Planning time is crucial for teams that are starting and we don’t have enough of it.”

However, PCG would have liked to have seen more innovative co-teaching practices in action during school observations. Most classroom pairs were following a one lead-one observe model. In all classrooms visited, one teacher provided direct instruction while the second teacher floated in the back of the class. In several classrooms the distinction between the special educator and the general educator was evident (as opposed to being just two teachers), and in some classrooms, the special educator functioned much like a paraprofessional. However, there were examples of positive practices from which to build. In one classroom, for example, the co-teaching relationship appeared seamless and both educators functioned in ways that pushed student learning forward. The need for structured collaboration time coupled with more training, as noted earlier, may help improve on some of these classroom practices.

Student focus group participants also had a number of positive observations about this model. Interestingly, there appears to be no stigma among focus group participants for being enrolled in these courses, instead they viewed access to a second teachers as an asset. Comments included:

- “If one teacher is talking about something, there’s another teacher to ask for help.”
- “I have a second person to talk to and I know that I have the help that I need.”
- “It’s comforting to know you have something to fall back on” (referring to the presence of a special educator).

Coursework Taken by Students with IEPs

Student with IEPs in Team Classes

In the leveled course system at the high school, team taught classes are called College Prep with Supports (CPS) and they are the supported version of a general college preparatory classes. There is no team inclusion offered at either the College Prep or Honors level. As a result, almost 82% of the students in CPS courses have IEPs. This concentration forces the question if these courses can really be considered inclusive learning opportunities for students and if they are providing students with IEPs meaningful access to their non-disabled peers. The charts below highlight the percent and ratio of students in a team taught class with IEPs to their regular education peers.
Chart 5.0. Percent of SPS Students in Team Taught Classes with an IEP, 2014-15

Chart 5.1. Ratio of SPS Students in a Team Taught Class with an IEP to Non-IEP Students, 2014-15
Access to Accelerated Courses and the CTE Program

In addition to including students with IEPs in regular general education classes, it is important that they be included in courses that demand a high level of rigor, e.g., honors, advanced placement, etc. In addition, it is important that they have an equal opportunity to access world language courses and the high school’s Career and Technical Education (CTE) program.

Participation in Advanced Classes

In contrast to the number of students with IEPs in team taught classes, advanced classes—Honors and AP level—have a very low number of students on IEPs.

- 2.4% of students enrolled in advanced classes had an IEP
- 2.8% of students enrolled in Honors courses had an IEP
- Less than 1% of students enrolled in AP courses have an IEP. Of the 428 students taking an AP class, only 2 classes included a student with an IEP (1 student in each class).
- Those students with IEPs taking a World Language course were most likely to be enrolled in Spanish for Native Speakers.

Chart 5.2. Percent of Students taking Advanced Classes (Honors and AP) with Disabilities, 2014-15

Participation in the CTE program

Course participation in the CTE program is notably much stronger. In half of all CTE courses offerings, at least a quarter of students enrolled have an IEP. Although students with IEPs are enrolled in every CTE course offered, there is a discrepancy in their course taking patterns. The CTE Program and the Special Education Office may want to work together to determine if there are greater opportunities for increased student participation across all classes.
Study Skills

The high school offers a Study Skills course for students with IEPs who may benefit from such a class. It is designed to offer a curriculum that helps students with their study habits and organizational skills. However, there is some concern that this class has become more of a study hall for students. During observations of these courses, PCG did not observe any instruction. Students were either doing homework or sitting at their desk but not engaged in an activity. Student focus group participants expressed the following explanations of Study Skills:

- “You can end up sitting in there doing nothing.”
- “Study skills is a period to do your homework.”
- “You are supposed to read a book if you don’t have homework, but I usually just chill.”

IEP Quality

There has been a focused effort this year from the Special Education Office to greatly improve the quality of IEPs. The Assistant Director of Special Education is now personally reviewing every IEP, and providing specific feedback for improvement. Goal writing has been a specific targeted improvement area. This effort has also included additional training for staff. While some have noticed a difference, others have noted that more training is needed. Other group participants noted that while they have received corrections on their IEPs, they had not gotten clarification on how to actually fix them.

Specific comments from focus group participants included:

- They are “telling us to change how we write IEPs but there’s no exemplar.”
- “The changes are good changes because they make better IEPs.”
- It would be helpful if there was “more communication about IEP expectations.”
Compliance

SPS recently completed a state-facilitated Coordinated Program Review (CPR), an intensive audit that focuses on a number of compliance related metrics for special education. Initial feedback from state auditors was positive and no major areas of concern were noted. Full findings will be shared with the District later this school year. As such, this area was not an in depth focus of this review.

Timelines

A number of focus group respondents brought up concerns over lost paperwork or lost testing related to the IEP process. There was noted concern from multiple individuals, for example, about referral forms “being lost” once they were placed in the Facilitator’s mailbox. Part of this concern was based on the perceived overreliance on paper. Moving towards more electronic data capture would help to alleviate this challenge. Others expressed concerns over timeliness, meetings, and other events. Others noted that while key dates seemed to occur on time, it was always a “last minute mad dash” to get there. Again, more reliance on electronic recording of data and reporting out on these targets would help to quell these concerns.

Vertical Transitioning between Grades

Because the District has a K-8 model for its elementary and middle schools, transitions tend to mainly occur at two points: from the Capuano Early Childhood Center to 1st grade (for a small number of students) and from middle to high school (for a large number of students). The District has recently given a lot of attention on the middle to high school transition, and as a result collaboration is better than it had been in the past. Activities include: high school students visit students to talk about programs, course selection occurs in the spring with a thoughtful plan for each student, and students have the opportunity to visit the high school. Staff brought resource room students on an additional 1-2 visits to help students make a connection. The facilitators have also started creating a guide based on student characteristics.

Students reported a positive and supported transition experience. They described shadowing a high school student for a day (initially intimidating, but fun in the end) and receiving personalized help registering for courses as the two activities that most helped with their transition. A number of students also described the freshman exploratory program, where students have the opportunity to explore a number of CTE courses, as a good way to get to know their career interests and help integrate them into the high school.

Accommodations/Modifications & Collaboration

It was reported that most general education teachers are willing to accommodate students and work with special educators. However, it was reported that it was sometimes difficult to get guidance from special educators about accommodations/modifications needed for students with IEPs. Some teachers shared concern about not receiving information at the beginning of each school year regarding student needs. It was also reported that access to “IEPs at a Glance” was not always expedient, and that it would be helpful to have electronic access to them. While planning time before and after school was used in some schools for collaboration, others reported insufficient time for this activity.
Configuration of SPS Special Program & Services

SPS has three special programs for school-aged students educated in separate classes for the majority of the school day. In addition a few schools have self-contained programs that target specific disabilities. The District’s stated goal is to make every effort to keep students educated in the District, wherever possible. The investment of extensive resources for a high school program for the medically frail demonstrates that commitment. Because SPS operates under a controlled choice student assignment plan, PCG was not able to determine how many students are attending programs that are not at their home school. Programs and brief descriptions are provided below.

Exhibit 5.1. Specialized Programs at Somerville Public Schools, 2014-15

<table>
<thead>
<tr>
<th>Program Name or Disability Area</th>
<th>Location</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>SEEK</td>
<td>Kennedy School</td>
<td>Geared for students with severe emotional needs. Cluster of classrooms supported by two clinical coordinators and a program director. Five classes of 6-7 students each, grades K-6</td>
</tr>
<tr>
<td>SKIP</td>
<td>Kennedy School</td>
<td>Provides instructional and rehabilitation services for students with severe intellectual, medical and physical disabilities. Cluster of classrooms with necessary supports to bring kids back from hospital settings. An accessible pool exists on school premises. Some opportunities for inclusion. One student “tuitioned in” from another district attends. 3 classes, grades PK-8</td>
</tr>
<tr>
<td>SHIP</td>
<td>High School</td>
<td>Provides instructional and rehabilitation services for students with severe intellectual, medical and physical disabilities. This is a new program in the district that opened this spring and currently serves one student. SPS’s goal is to retain more students in the district and minimize costly out-of-district placements. 1 class that will eventually support 5-6 students, grades 9-12</td>
</tr>
<tr>
<td>Language-based</td>
<td>Healy ESCS</td>
<td>3 classrooms each, grades 1-8</td>
</tr>
<tr>
<td>Learning Disability</td>
<td>WHCHIS</td>
<td>4 self-contained classes, grades K-6</td>
</tr>
<tr>
<td>Autism</td>
<td>WHCHIS</td>
<td>3 self-contained classes, grades K-6</td>
</tr>
<tr>
<td>Learning Disability</td>
<td>Kennedy</td>
<td>2 self-contained classes, grades 6-8</td>
</tr>
</tbody>
</table>
The Capuano Early Childhood Center also has eight preschool classes and two kindergarten classes taught by special educators. At the preschool level, five classes are integrated and three are self-contained for students with moderate to severe learning needs and autism. There is one integrated and one self-contained kindergarten class.

**Education in Separate Day Schools**

When IEP teams determine that a student’s needs cannot be met within a regular school, even in a special program, the team considers a more restrictive separate day school (public or nonpublic) and whether that setting is required for the student to receive an appropriate education. There are two special education public day schools in the District: Next Wave Jr. High and Full Circle High School.

Next Wave Junior High and Full Circle High School operate jointly and share a principal. The minimum age for Next Wave is age 12; Full Circle is grades 9-12 and takes students past their 21st birthday. Student are referred for a variety of reasons related to behavioral concerns. About five years ago, the school began accepting any Somerville student who met the school’s entry criteria, and students are no longer required to have an IEP to attend. Between 60-70% of students have IEPs at any time during the school year. All educators in the school currently have special education licensure. There is an 8:1 student to teacher ratio, which reduces the need for paraprofessionals. These small class sizes allow student needs to be met by a teacher. As noted in an earlier section, the schools’ suspension rates are high, and staff could benefit from additional behavior training.

There has been discussion about whether the District should switch the school’s status from a special education day school to an alternative program as it now serves a number of students without IEPs. There appears to be no impact on the District’s accountability measures given the school’s small numbers if this switch is made, but PCG would recommend the District confirm this understanding with the state. The District does not currently have a state-approved public day rate. There is precedent for public school districts in Massachusetts to receive such a rate. This option may be a financially advantageous to the District, as it may enable the additional recuperation of Circuit Breaker and Medicaid dollars. Further financial analysis needs to be performed by the District prior to pursuit of this option. District analysis would have an impact on PCG’s recommendation related to school status.

**Transition to Post-Secondary Activities & Education**

For students to make a successful transition from secondary education to postsecondary training, education, employment, and, where appropriate, independent living skills, students must graduate with a regular diploma (to the maximum extent possible) or a graduation certificate, and receive appropriate postsecondary activities and support.

**Postsecondary Outcomes**

Based on the Department of Elementary and Secondary Education’s (ESE) report of graduates attending higher education, 65.8% of students who graduated from Somerville in 2012 went on to attend a postsecondary institution, while only 52% of SPS students with disabilities continued their education. As evidenced in Chart 3.0 below, both the SPS overall rate and rate of students with disabilities attending higher education are lower than the state comparisons. SPS students with IEPs were less likely to attend a 4 year institution than their state peers, but more likely to attend a public 2 year institution or

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26 For more information on MA’s Circuit Breaker Program: http://www.doe.mass.edu/finance/circuitbreaker/
community college. PCG did not have access to student workforce data, and would encourage the District to monitor data for those students with IEPs seeking employment after graduation to ensure transition opportunities match career goals.

Chart 5.4. Percent of Students with SPS/State IEPs Attending Institutions of Higher Education, 2011-12

**Postsecondary Transition Support**

School districts are required to facilitate the transition of students with IEPs to post-secondary activities, beginning by the age of 16 years, or sooner as determined by the IEP team. The IEP team, including the student, uses age-appropriate transition assessments to design transition services and support, identify postsecondary outcomes, plan a course of study, develop a coordinated set of transition activities, and identify interagency responsibilities and linkages as appropriate. Transition services and support prepare students for employment and independent living through a coordinated set of 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.

There is no Transition Facilitator in the District. Transition activities for students are coordinated between the guidance department and the student’s liaison. The District contracts with an outside firm to provide work experiences for students. Feedback on this relationship was that opportunities offered felt limited and may be more actively provided if the District brought this program back in house. Overall, SPS transition support activities are reported to be limited and have been identified as an area of improvement.

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28“SPS Students” and “MA Students” represent total enrollment numbers, including students with IEPs
29MA ESE Guidance on Transition from School to Adult Life http://www.doe.mass.edu/sped/links/transition.html
Students begin taking a more active role in their IEP development no later than age 14 as part of their transition activities. Student focus group participants noted positive experiences with attending their IEP meetings. They noted that it “feels good to be included” and “in the loop.” As one student powerfully noted, “It tells me what happening and that’s it ok that I learn this way.”

30 Technical Assistance Advisory SPED 2009-1: Transition Planning to Begin at Age 14
http://www.doe.mass.edu/sped/advisories/09_1ta.html
VI. Support for Teaching & Learning

This section provides information about SPS’s support for the teaching and learning of students with IEPs. It addresses the following areas: Organization, Special Education & Related Services: Personnel Ratios & Support, Assistive Technology, Professional Development, Transportation, Fiscal Issues, Parent Involvement, and Accountability for Desired Results.

Organization

The SPS organization at the central office level and at the school level are discussed below related to the effective and efficient administration and operation of specially designed instruction (SDI) and related services.

District Leadership

The District’s current Superintendent has a hands-on approach and has taken a very active role overseeing special education in the District. There is a strong commitment at the district level to support change, and the Superintendent and Assistant Superintendent empower staff to drive this change. This belief was echoed by numerous focus group participants. There is also the belief that the District is willing to make necessary financial investments in special education to improve student achievement, to bring more students back into the District, and to realize longer-term savings.

Special Education Office

There have been several significant changes in the Special Education Office for the 2014-15 school year that have had an impact on the office’s management and capacity. The Special Education Director is new to her role this year as the previous director retired. However, she is not new to the District as she served as the Assistant Director of Special Education for many years. The Assistant Director for Special Education is also new both to her role and the District this year. Four of the six facilitators are also new to their positions this year, 3 of whom came from SPS classrooms. As such, it has been a year of learning and transition for special education in the District. Further, a new superintendent will be starting in July 2015.

Now that new leadership has a better understanding of the organization, the Office has begun to develop new systems and better documentation of procedures. The Special Education leadership should continue to prioritize clarifying the processes and expectations for special education staff in the coming school year. This should occur through written communication in a consolidated format, mandated in person professional development targeted at special educators, and job-embedded coaching/mentoring.

Role of the Special Education Director

As the department grows under the direction of a new director, there are several key areas to address immediately.

- **Unrelenting focus on instruction.** The Director should focus on increasing meaningful inclusion and high quality co-teaching, ensuring student access to core instruction and challenging curriculum. This is a critical first step to beginning to close the achievement gap and see measurable academic progress for students with disabilities.

- **Set a clear, measurable, and long term vision.** The Director established an entry plan with key focus areas (inclusion, parent relationships, transition, and technology) in March 2014. This plan
should serve as the foundation in the development of a cohesive, collaborative vision with clear expectations around the department’s goals for the next 3-5 years.

- **Foster relationships with families.** The Special Education Director should strive to strengthen relationship with families, seek their input, and work to build and maintain more collaborative partnerships. The Special Education Director may want to organize and lead a Special Education Committee/Working Group that would include special education staff, non-special education staff, School Committee members, and parents to so that the school committee and the community can obtain a better depth of understanding of special education issues in the district. This group should provide regular public updates to the School Committee and help establish the long term vision for the department.

**Organization of the Special Education Office**

The current SPS organizational chart shows that the Special Education Director reports directly to the Superintendent, as does the Assistant Superintendent of Curriculum, Instruction and Assessment, the Director of Student Support, the ELL Program Director, and the school principals. In many districts of all sizes across the US, the Special Education Director does not report directly to the Superintendent, but rather to a Chief Academic Officer or similar title in order to work collaboratively on building inclusive programs and services to meet the instructional needs of diverse learners.

The new Superintendent may want to consider changing the District’s organizational chart so that the Special Education Director reports to the Assistant Superintendent of Curriculum, Instruction and Assessment to encourage a more aligned focus on closing the achievement gap. The Superintendent would continue to play an active role in key special education decisions. Equally, the Assistant Superintendent of Curriculum, Instruction and Assessment should facilitate regularly scheduled meetings with the school principals and the Special Education Director to support the joint ownership of special education programs between schools and the central office, facilitate communication between all stakeholders, and provide for an integrated, collaborative learning community for school administrators/content administrators. The Special Education Director should still be included as part of the Superintendent’s Cabinet.

Further, SPS should review supervisory responsibilities for the Special Education Director and the Assistant Special Education Director. Their list of supervisees appears eclectic and somewhat based on previous reporting histories. Some Facilitators report to the Special Education Director, while others report to the Assistant Special Education Director. The same situation holds true for other job types as well. For example, three school adjustment counselors report to the Special Education Director, while eight school adjustment counselors report to the Assistant Special Education Director. One speech pathologist reports to the Special Education Director, while the remaining to the Special Education Director. Moving forward it is recommended that all individuals with a similar job title report to the same individual. This will ensure better clarity of job expectations, ease communication/coordination and make it easier for the supervisor to schedule meetings for the group.

Currently the Special Education Office serves as the supervisory evaluator for 31 special education teachers. The school principal performs that function for the remaining 54. More clarity is needed as to why this distinction exists. As one focus group member noted when describing supervision of teachers, “it is clear who they have, but not why.” Wherever possible, special education teacher evaluations should be done by the building principal with input as needed from the Special Education Office.

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31 If SPS follows this recommendation, the District may also want to consider having the Director of Guidance and ELL Program Director follow the same reporting structure.
Supervision of paraprofessionals also warrants further review. PCG understands that some paraprofessionals report to their school principal, while others report to either the Director or Assistant Director of Special Education, but we were not able to get exact numbers. It was noted that each paraprofessional is evaluated at the discretion of the principal, either by the special education office or the principal. Paraprofessionals are annual employees, and are presumably evaluated prior to contract renewal. Moving forward, all supervision of paraprofessionals should move back into the schools and evaluation frequency should be consistent for all paraprofessional staff.

Facilitators

There are six facilitators in the District. Four of the six are new this year, and have spent considerable time this year learning their role. They serve as the public face of the program, so it is important they are well-versed in district policies/procedures and can appropriately communicate these with parents. They do not hold a supervisory role, but are charged with monitoring the work of typically around 20 liaisons to ensure all paperwork is updated and in compliance. Liaisons noted, as they are not administrators, they do not actually have any authority to hold liaisons accountable for timely and compliant completion of paperwork. Yet, compliance oversight appears to be a major component of their job. All initial evaluations for special education services are also performed by facilitators, and they may attend other IEP meetings when there is an expected issue. None of the facilitators are bilingual, but the District has made an effort to recruit a bilingual individual in this position.

Shifting the primary focus of their role from compliance monitors to coaches would allow for a more productive and effective relationship with school staff. Management of compliance should shift more centrally, and principals should take ownership of building-level compliance matters. As noted earlier, principals—not facilitators—are liaisons’ supervisors and are accountable for the overall success of special education in their building.

Given their steep learning curve this year, the Special Education office implemented weekly two hour in-district trainings for the facilitators. These sessions are run by the Special Education Director and the Assistant Special Education Director, and have covered a wide range of compliance and programmatic topics. These trainings were reported to be highly beneficial by a number of focus group participants. It is the expectation that Facilitators then bring meeting content back to the buildings for school-based weekly meetings of special education staff. Focus group participants reported the quality and consistency of these school meetings varied, but most found them valuable. In addition, a few facilitators attend monthly new facilitator meetings though the Shore Educational Collaborative and reported to find them useful.

This year, one facilitator focuses only on out-of-district students. In previous years, these students were split among facilitators. Having a single person perform this role is more efficient and manageable, and it is recommended that this division continue in the future.

Communication

There have been attempts made this year by the Special Education office for better communication with school-based staff. For example, the Special Education Director now sends out detailed monthly newsletters to all special education staff. Content has included a wide range of materials, such as MCAS Alt, confidentiality, observations, new forms, etc. Clerical staff are now included in the department meetings, which has reportedly resulted in a happier staff and higher quality work.

School-based focus group participants indicated that while they appreciate the newsletters, there is still room for improvement. There is the sense that protocols have frequently changed this year as the office leadership learns their roles, and that communication often happens through sporadic emails or word of
mout. Focus group participants indicated a desire for a central location where all updated protocols and new forms could be found. Others have reported difficulty getting in contact with their facilitator or getting communication back in a timely manner. This lag in communication feels most challenging when there is a parent waiting for an answer.
Special Education & Related Services: Personnel Ratios and Support

Special Education Teachers and Paraprofessional Aides

This section provides information about SPS special education teacher and paraprofessional aide staffing ratios compared to other school districts, and feedback about their availability and use.

Comparison of Staffing Ratios

As reported in Exhibit 6.0, SPS has an overall average of 12.3 students with IEPs (including those with speech/language needs only) for each special educator. This average is lower than the 14.5-student average of all districts in the survey, ranking the SPS as 11th among the 51 responding districts. SPS has an overall average of 11.6 students with IEPs for each paraprofessional aide, which is 4 students less per aide than the all-district average of 15.6 students, ranking SPS as 7th of the 51 responding districts.

Exhibit 6.0. Average Number Students with IEPs for Each Special Educator and Paraprofessional Aides, 2014-15

<table>
<thead>
<tr>
<th>Areas of Comparison</th>
<th>Special Educators</th>
<th>Paraprofessional Aides</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of SPS Staff FTE</td>
<td>85</td>
<td>90</td>
</tr>
<tr>
<td>SPS Student w/IEP-to-Staff Ratios</td>
<td>12.3:1</td>
<td>11.6:1</td>
</tr>
<tr>
<td>All District Average Ratios</td>
<td>14.4:1</td>
<td>15.6:1</td>
</tr>
<tr>
<td>SPS Ranking Among Districts[32]</td>
<td>11th of 51 districts</td>
<td>7th of 51 districts</td>
</tr>
</tbody>
</table>

Special Educators

Though school districts in Massachusetts must follow state guidelines regarding specific caseload requirements, SPS does not appear to have a well-articulated or communicated methodology that reflects how special educators are actually allocated to schools in an equitable and sufficient manner. There is a general consensus expressed by focus group participants that caseloads are manageable and not as large as those in nearby districts but that variations in caseloads exist between schools.

The areas below reflect several concerns expressed by focus group participants regarding the allocation and use of special education teachers.

- Though special education teachers may have reasonable caseloads on paper, these teachers are often pulled out of their classrooms to do testing, evaluations, and IEP meetings, and to support non-instructional activities. It was reported that some special educators give up their prep times in order to provide IEP-mandated services to students on their caseloads.

- Special education teachers in the elementary grades can have a grade span of students in 1st through 5th grades. As a result, they are not always able to provide adequate instructional support in the general education classroom because of scheduling conflicts (e.g., 1st grade and 5th grade have math class at the same time and the special education cannot be two places at one time) and the immense range of instructional needs in such a wide grade span.

Paraprofessionals

Like other school districts, SPS hires paraprofessionals that are programmatic (prescribed based on established program parameters and students in a particular school’s program) and for individual or groups of students to support their IEP designated needs. In many school districts nationally, special education leaders and budget directors believe there is an “out of control” process for determining an

\[32\] Ranking begins with districts having a low average number of students to one staff person.
IEP-based need for paraprofessional support, resulting in a continued increase in staff hires. There is no information indicating this is a major area of concern for the District. It was reported that over the past few years, the District has been sensitive to the use of paraprofessionals and has actively worked to minimize their use. SPS should establish strong protocols that require IEP teams to consider fading these staff as students enter middle school and high school.

There are a few areas of concern that were raised in relation to paraprofessionals that warrant further review. These include: 1) paraprofessionals are told not to speak with parents; 2) paraprofessionals do not have access to students’ IEPs nor are they fully aware of their content; and 3) paraprofessionals are pulled during IEPs meetings to cover for the general educator, resulting in students not being serviced.

**Related Service Providers**

This section provides information about related service provider staffing ratios compared to other school districts, and feedback about their availability and use.

**Staff Ratio Comparisons for Psychologists, Speech/Language Pathologists, Social Workers, Nurses, Occupational Therapists and Physical Therapists**

Staffing ratios and other data regarding related-services personnel are summarized below and detailed in Exhibit 6.1. The ranking begins with districts having the lowest average number of students per staff person. In other words, districts with high rankings would have larger than average caseload sizes. The below ratios include contract staff.

**Exhibit 6.1. Ratios of Students with IEPs to Staff for Related Service Providers, 2014-15**

<table>
<thead>
<tr>
<th>Related Service Areas</th>
<th>Psychologists</th>
<th>Speech/Language</th>
<th>Social Workers</th>
<th>OTs</th>
<th>PTs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of SPS Staff FTE</td>
<td>1</td>
<td>9</td>
<td>10</td>
<td>8</td>
<td>3</td>
</tr>
<tr>
<td>SPS Students w/IEP-to-Staff Ratios</td>
<td>1,048:1</td>
<td>116.4:1</td>
<td>105:1</td>
<td>131:1</td>
<td>349:1</td>
</tr>
<tr>
<td>Average of All Districts Ratios for Students w/ IEPs-to-Staff</td>
<td>195.4:1</td>
<td>109.4</td>
<td>238:1</td>
<td>425:1</td>
<td>953:1</td>
</tr>
<tr>
<td>SPS All Students-to-Staff</td>
<td>4,987:1</td>
<td>554.1:1</td>
<td>499:1</td>
<td>623:3:1</td>
<td>1,662:1</td>
</tr>
<tr>
<td>SPS Ranking Among Districts&lt;sup&gt;33&lt;/sup&gt;</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; of 46 districts</td>
<td>7&lt;sup&gt;th&lt;/sup&gt; of 50 districts</td>
<td>13&lt;sup&gt;th&lt;/sup&gt; of 35 districts</td>
<td>3&lt;sup&gt;rd&lt;/sup&gt; of 49 districts</td>
<td>8&lt;sup&gt;th&lt;/sup&gt; of 49 districts</td>
</tr>
</tbody>
</table>

**Psychologists**. There is one district psychologist for an average of 1,048 students with IEPs compared to the surveyed district average of 195.4.1 students, ranking SPS as 1<sup>st</sup> of the 46 reporting districts.<sup>34</sup>

**Speech/Language Pathologists**. There is one district speech/language pathologist (SLP) for an average of 108 students with IEPs compared to the surveyed district average of 109 students, ranking SPS as 30<sup>th</sup> of the 49 reporting districts.

**Social Workers**<sup>35</sup>. There is one district social worker for an average of 105 students with IEPs compared to the surveyed district average of 238 students with IEPs, ranking SPS 13<sup>th</sup> of the 35 reporting districts.

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<sup>34</sup> See Appendix for comparison groups and full ran
<sup>35</sup> Social Worker category includes Adjustment Counselors.
Occupational Therapists (OT). There is one district OT for an average of 131 students with IEPs, which is much less than the surveyed district average of 425 students, ranking SPS as 3rd of the 49 reporting districts.

Physical Therapists. There is one district physical therapist for an average of 349 students, which is much less than the surveyed average district average of 953 students, ranking SPS 8th of the 49 reporting districts.

Assistive Technology

According to the National Dissemination Center for Children with Disabilities, assistive technology increases a student’s opportunities for education, social interactions, and potential for meaningful employment. It also supports a student’s participation in learning experiences in the least restrictive environment. Assistive technology is a tool to help students benefit from the general education curriculum, and access extracurricular activities in home, school and work environments.36

A few areas of concern are summarized below.

- **Coordination.** SPS does not have a district individual with special education content expertise charged with the coordination, training and management of AT across the district.

- **Criteria for Need.** SPS does not appear to have a checklist or criteria for determining the need for AT. PCG could not find any reference to AT in the newly revised Manual for Special Education Teams in the Somerville Public Schools. This would be the ideal location to store this type of checklist.

- **Underutilization of AT Devices.** Common belief is that the district has a wealth of options for AT, but many teachers lack the expertise to properly use these resources. There is also the belief that AT is rarely included in the IEP, and that training on how to write goals related to AT is needed.

- **Awareness of AT.** Some focus group participants expressed concern that teachers and parents do not have sufficient information about AT and the referral process. Information about AT and the referral process was not found on the SPS general or special education website. There is also not a centralized inventory that catalogues all options and their appropriate usage.

- **Lost Devices.** SPS does not have a policy or procedure for addressing lost AT devices in a uniform manner.

Professional Development

Focus group participants expressed a need to look at SPS’s structure and content of professional development for special educators. All teachers, including special educators, are contractually required to participate in 22.5 after-school professional development hours plus four full-day professional development sessions annually. Many teachers participate in additional summer professional development for in-service payment or course credits.

There has been a move in recent years for all school staff to attend building-based professional development, and special educators were included in this shift. Instructional Leadership Teams determine professional development for building staff, and time spent on special education topics is often limited. There is no dedicated time for special education administrators to meet with all special education staff.

36 http://nichcy.org/schoolage/iep/meetings/special-factors/considering-at
Focus group participants indicated a huge desire to use some of their professional development time for content-based professional development. It was suggested that it may make sense to follow a model similar to that of the ELL department or of a specialist, where most of their time is dedicated to school-based inclusive professional development, but a portion of it is set aside for content specific professional development.

In this absence of dedicated time, special education staff are currently using their directed special education staffing time to fill this gap. Staffing time is led by facilitators, not district administrators, thereby potentially leading to errors when communicating complex compliance changes. There is not always full staff attendance at these meetings, and they do not always occur weekly. Focus group participants noted that training often occurs “word of mouth from one staff to another.”

Multiple focus group participants also indicated the strong desire for more behavior training for both special education and general education. It was also noted that new staff have not been trained on EasyIEP™ and that some veteran staff would benefit from a refresher training.

**Transportation**

The District currently outsources transportation for students with IEPs that require transportation services. Most students are walkers, with the exception of special education and ELLs, so outsourcing this service is a cost-effective choice. There is a long relationship with the current vendor that appears amicable. As a cost savings decision, SPS currently shares routes where appropriate with Cambridge Public Schools. However, the District expressed lack of clarity about how shared routes are determined, and whether student time on the bus could be further minimized. Some focus group participants indicated concerns over the perceived length of ride times for these shared routes, along with reports of drivers consistently arriving late to school (for a population that could benefit from additional transition time). SPS should work with the vendor to do further analysis of route maps, scheduled vs. actual ride times and scheduled vs. actual school arrival times to determine if route changes should be made.

All bus drivers receive a mandatory training before they begin their routes that is conducted by the vendor. However, based on vendor description, there did not appear to be any focus on special education topics during this training. The Special Education office was not aware of the specific content of the training, nor had they provided input on their expectations. The District may want to play a more active role in developing and delivering training for drivers that would provide them with a better understanding of how to more appropriately transport students with disabilities, particularly how to address those with emotional disturbances.

Focus group participants also noted the concern that students with IEPs attending district programs with transportation are not always able to participate in after school activities (such as school dances) or other extracurricular opportunities because transportation is not available for them. For many students, these afterschool activities would provide excellent opportunities for additional interaction with their non-disabled peers. It was suggested that transportation is available for these students if requested, but focus group participants did not appear to know of the process to make that request.

**Data Use**

**Current District Practices**

There was inconsistency among focus groups as to the current expectation of data use across the District. Some groups reported that they look at data routinely, while other groups said that SPS needs a more formal approach to collecting and using data.
IEP Data Management System
The District uses a web-based IEP data management system, EasyIEP™, that is managed by the Special Education Department. There are several areas of improvement needed for the District to make more effective use of this tool.

1. **Integration.** A Special Education Secretary currently hand enters IEP data into the District’s Student Information System, which is for all District and state reporting. This process is time-consuming and increases the possibility for data entry error. SPS should work with their vendor to automate this process.

2. **End user training.** Several focus group participants reported that they have never received formal training on the system and were unsure of its full capabilities. This training could be performed by the vendor or by the District.

3. **Administrator Training.** Central office administrators noted difficulty understanding some of the reporting features in the system and would benefit from another training provided by the vendor.

4. **Functionality.** The District should request a process review by the vendor to ensure that the District is fully and most appropriately using the system’s functionality.

Fiscal Issues
As with all school districts across the country, the area of special education is seen as a constant for expanding costs. There is a perception, however, that the Superintendent has stopped costs from spiraling with an expectation that activities must be measureable and by initiating an MTSS process. The following exhibits reflect fiscal data pertaining to special education spending.

**2012-13 Rate of Special Education Spending Compared to Other Massachusetts School Districts**
Chart 6.0 shows the percent of SPS spending in the 2012-13 for the area of special education compared to other Massachusetts school districts. These data show that SPS’s special education spending rate of 21.5% is less than two other districts, Haverhill and Salem. The 9 districts’ spending percentages range from a high 25.9% to 17.2%. Six school districts have lower spending rates than SPS.

**Chart 6.0. Percent of Special Education Spending of Total: SPS vs. Comparable Districts (2012-13)**
Study of Somerville Public Schools Special Education Services

Six-Year Comparison of Total SPS Special Education Cost & Total Special Education Enrollment

Chart 6.1 reflects the relatively steady increase in special education per pupil costs from 2007-08 to 2012-13. Though the special education population in the district declined by 123 students over this time period, the per pupil special education cost increased from $11,513 to $15,475 (an increase of $3,962/student). This increase warrants further review by the district to understand the impetus of these cost drivers.

Chart 6.1. Six Year Total Special Education Enrollment and Per Pupil Cost

Percent of SPS Special Education Spending from 2007-08 to 2012-13 Budget

The last chart shows that the rate of total special education spending has increased slightly since the 2007-08 school year. In the 2012-13 school year, the budgeted amount increased to 21.5%, an increase of 3 percent from the 2007-08 school year. Total overall spending rose by $2.5 M ($72.6M to $75.1M, or 3.4%) in this time period, while special education spending rose by $2.7 M ($13.4M to $16.1M, or 20%).

Chart 6.2. Percent of SPS Special Education Spending Over Time

Contracted Services

SPS currently contracts with outside organizations for various services, including occupational therapy, physical therapy, nursing, and psychology. Psychological services for student evaluations, team meetings, and consultations for the 2014-15 school year were budgeted at $350,000. If possible, the District may want to consider hiring an additional full time psychologist in order to reduce these contracted service costs. This change would help to build internal capacity and create continuity for students.

37 http://www.doe.mass.edu/finance/statistics/
38 Id.
Parental/Family Engagement

Parent focus group members expressed a general belief that SPS has several strong programs, schools, and dedicated teachers. Some focus group parents, however, believed the partnership between the District and families could be improved. It was also reported that experiences with IEP service delivery varied greatly by school and by teacher.

While there is a general sense that many parents are satisfied with SPS’s special education program, there also seems to be an underlying current of strong discontent among some parents. There are different perceptions regarding how SPS interacts with parents who are asking for services/programs that are different from IEP team recommendations. It is the perception by some that more educated or affluent parents are able to express their concerns and navigate the IEP process, while parents with less schooling or who are not native English speakers may be less likely to understand how to advocate on their child’s behalf. This has led to the perception from focus group participants that “different types of families receive different types of services.”

The District has employed multiple strategies to engage families and strengthen this partnership. There is a Parent Advisory Council Coordinator who is employed by the District. The District has held a number of Parent/Guardian discussion groups this past year in an effort to deepen the partnership with parents, and had solid attendance at these efforts.

Below are some of the specific ideas of improvement that were raised:

- New special education staff are not routinely introduced to parents. This could be done through principals’ routine communications to families (i.e., newsletters).
- Families receive different information related to how eligibility is determined. Families would benefit from having a jargon free process flow diagram posted on the District’s website.
- The IEP process and document are hard to understand because of the terminology. Families would benefit from a “cheat sheet” to be distributed at IEP meetings and on the District’s website.
- Focus group participants noted the belief that many out of district families would prefer to come back if the appropriate placement for their child existed.
- Parents indicated the desire for wanting to know about summer programming much sooner. In the past, they have not found out about options until late May. At that point, parents indicated, most families have made other plans for their child to ensure consistency throughout the summer months.

Continued parent training, coupled with more resources provided to parents about the special education program, would help to mitigate noted concerns from the parent community.

Parent Advisory Council
The District has an active Special Education Parent Advisory Committee that provides support to families and represents the special education parent voice. They maintain a webpage on the District’s website that contains extensive resources for families. While PCG noted signs up advertising meetings in school buildings, most members indicated hearing about the group from another family.

There is a subcommittee of this group that has recently formed, known as Advise the Advisory, which has a strong voice in the District’s special education community. Somerville Advise the Advisory has an active Facebook page that could be used to communicate with a broader audience. The group also conducted
their own email survey in January 2014 that, along with their annual meeting, contributed to a report that was submitted to the District. Some of their recommendations are similar to those of this report; others may warrant further review.

**Special Education Webpage**

The District website has a separate special education page. The intent of a dedicated page for parents, students, and the community should be to enable the District to post information that would maximize access to research-based information and SPS activities relevant to teaching and learning, as well as resources for external stakeholders. While the District has made an effort to populate this webpage, additional attention is needed to make it a more useful tool. For example, the “Sped Forms” tab contains no files and “Student and Parent Rights” leads to a broken link. Other information, such as the “Resources for Teachers” would confuse and overwhelm any community member who clicked on it and would be better housed with the District’s Special Education Standard Operating Procedures Manual. Other sections of the webpage have typos. The District’s Athletic and Music departments, as a comparison, have a wealth of information for students and families that appear up to date and relevant.

**Parent Participation in IEP Meetings**

Parents are encouraged to participate in making decisions about their children’s educational programs and services, and the District has a very high attendance rate of parent participation in IEP meetings. Focus group parents represented concerns that although they are told they are an integral part of the IEP process, sometimes district actions are not aligned with this statement. Typically, this occurs when IEP discussions make it appear that a student’s placement is determined prior to the meeting because other options are not given serious attention, or parents’ input is not explicitly taken into account. Focus group participants shared that IEP meetings often feel impersonal. It was also noted that District staff express a willingness to try to meet the needs of every child and are fair in their efforts.

**Formal Dispute Resolution**

In addition to informal dispute resolution that occurs frequently at the school level, IDEA has several formal processes: impartial due process hearings and state complaints. In addition, USED’s Office for Civil Rights (OCR) receives and responds to complaints involving Section 504 of the Rehabilitation Act, which includes issues involving special education and/or related services and supplementary aids/services. Documentation provided by the district did not allow for analysis, but formal disputes in the district have been reportedly minimal over the past several years.

The District currently employs outside counsel for special education issues, which has allowed SPS to proactively address issues and receive consistent legal advice when needed. Overall, it appears that the attorney’s relationship with parents and parent attorneys is positive.

**Accountability for Expected Practices & Results**

This section discusses SPS’s system of accountability for expected practices and results for students with disabilities and learning challenges.

**Comprehensive Standard Operating Procedure Manual**

School systems use policies, which are approved by the School Committee, and more commonly a manual of procedures and expected practices, which is typically developed by the special education department,
to guide district-wide and school-based activities for the administration and operation of special education. The use of a comprehensive standard operating procedure manual (SOPM) enables all personnel, parents, and other stakeholders to have a consistent understanding of a school district’s expectations regarding special education procedures and practices. In the absence of such a document, SPS personnel sometimes provide inconsistent information that can be confusing to other staff and parents.

The Special Education office is currently in the final stages of creating the SOPM, entitled “Manual for Special Education Teams in the Somerville Public Schools” and anticipates that it will be published later this spring. The draft SOPM offers a foundational understanding of the IEP process in Somerville. Once published, PCG recommends continued development of the manual to more detailed information on a variety of special education topics. These may include, among others: team roles and responsibilities; processes for students who are ELLs; options for transition services; dispute resolution and descriptions of district programs.

Once the manual is finalized, the special education director should oversee the roll-out process. The manual should be sent electronically to both special education and general education staff, with background information about how often it will be updated, where it will be housed, and who to contact with any questions. Facilitators should be charged with ensuring that special education staff at each school have reviewed the manual. Once completed, SPS should publish the SOPM on the District’s website, and use a flyer or newsletter to inform the SSEPAC and SPS of parents of where it can be found.

**Principal Oversight for Special Education**

Principals are charged with having ownership over special education in their buildings. There has been a major shift over the past decade, with most now taking that role seriously. Principal focus group participants were engaged, vocalized ownership for all children in their building and appeared hungry for more information on how to best serve this population of students. They noted wanting more opportunities to meet together to share experiences and best practices. For example, elementary principals would benefit from collaborating on how to best schedule their special educators and paraprofessionals to maximize the benefits of inclusion.

**School Committee**

The District’s School Committee website is informative and contains a wealth of data, some of which is indirectly related to special education. While the 2014-15 School Committee Goals do not make specific reference to special education, there is a goal related to a 10% reduction in the achievement gap for all subgroups.

**School Improvement Plans**

Five of the seven elementary schools make specific mention of narrowing the achievement gap for students with IEPs in their School Improvement Plan Planning Grid. East Somerville Community School and the Argenziano School also included significant narrative dedicated to concerns related to the academic growth of this population, and improvements they plan to make in their school in the coming year. At the high school level, while there were a number of goals dedicated specifically to ELLs for example, none were focused on narrowing the achievement gap for students with IEPs.
Recommendations

1. **MTSS.** Build on SPS’s existing process to more deeply develop/implement a district-wide K-12 framework of Multi-Tiered System of Supports (MTSS) for academic achievement, positive behavior, and social/emotional growth for all students. Although MTSS is a general education initiative that covers all students, it is critically important to special education since 2nd and 3rd tier interventions must be considered during an IEP evaluation.

   a. **Staffing.** Hire a district-wide coordinator for MTSS. This individual will have responsibility for the implementation of the below recommendations.

      1) **Reporting.** The MTSS coordinator should report directly to the Assistant Superintendent of Curriculum, Instruction and Assessment, but will need to work closely with a cross-functional district team and school administrators. All work will need to align to initiatives of the Director of Elementary Curriculum and the Student Services Director.

      2) **Role.** The MTSS coordinator should be responsible for the consistent district-wide implementation of a culture of tiered intervention for all students, including special education, ELL and academically advanced students. This individual’s role should focus on both development of systems and supports for schools, along with professional development and on-site coaching for school staff. At least initially, this individual should participate in school-based MTSS meetings.

   b. **MTSS Framework.** Establish a District framework for the implementation of MTSS, including a written description and guidelines, for students in grades kindergarten through 12 performing below grade level standards.

      1) **Leadership.** Under the direction of the Assistant Superintendent of Curriculum, Instruction and Assessment, engage the District’s leadership team, including at a minimum school principals, the Director of Special Education, the Director of Elementary Curriculum, the Director of Student Services and the Director of ELL. All coordination should be led by the MTSS coordinator.

      2) **Standards.** Confirm or establish district standards for universal screening, tiers of increasingly intensive evidence-based interventions, progress monitoring/use of data to make educational decisions, and the engagement of families.

      3) **Roll-out.** Leverage existing practices at the elementary level to strengthen and refine implementation quality. Build upon these practices to expand implementation in the middle and high school level. While the district should aim to complete overall special education department improvements in the next 3-5 years, the separate MTSS roll-out at the middle and high school level should be complete in the next 2-3 years.

      4) **Promising Practices.** Take inventory of current school-based practices at the elementary level to identify existing program strengths. Celebrate these promising practices to build momentum. Provide opportunities to share and observe these practices across schools.

      5) **Messaging and Documentation.** Develop internal and external materials that explain MTSS and the research base for following a structured tiered intervention process. Create a user-friendly and accessible MTSS manual for school teams and for parents to understand the MTSS process and to document procedures/practices relevant to the management/operation of MTSS in SPS.
6) **Standard Form.** Develop a standardized electronic form to ensure consistent practice across the district. If possible, house completed student MTSS plans in a shared electronic location (such as the district’s Student Information System or another program) that allows for wide access for all appropriate parties to view a student’s plan. Parents should have access to this plan.

7) **Instructional Leadership Teams.** Establish standards for district-wide and school-based instructional leadership teams regarding the use of problem-solving and data-based decision making at all tiers. Ensure resources (staff, materials, data, documentation, etc.) are in place and supported to meet the instructional (academic and behavior) needs of all students and to promote academic advancement and positive behavior. Supplement teams as needed to support teachers.

c. **Professional Learning.** Provide a high-quality and ongoing professional learning curriculum that will enable principals/all relevant school personnel to implement the above activities (and other recommendations in this report). Identify the core information that various staff members need to implement the framework and differentiate professional learning. Professional learning should be on-going, deep and job embedded. The MTSS coordinator should develop and implement this curriculum.

d. **Cross-Function Training.** Initiate cross-function training of administrators and other school support groups from every educational division, including the Director of Finance, to expand their knowledge and ability to support school-based personnel. Consider mandating training and other approaches to ensure that staff members needing professional development receive it.

e. **Content.** Include information related to language development, English language acquisition, consistent progress monitoring, analysis and use of data for decision-making, implementation of scientific research-based interventions at varying levels of intensity, etc.

f. **Parent Involvement.** With parent stakeholder groups, such as the PTA or SSEPAC, consider how training will be made available for families/caregivers to reinforce activities that will support the learning of their children. Specific training should be provided for families whose first language is not English.

g. **Implementation.** Based on these standards, develop an expedited two-to-three year district-wide implementation plan for MTSS. This timeline should include expansion into the middle grades and the high school. As part of this planning process, consider how each school will have access to sufficient evidence-based interventions to meet the needs of most students and access to additional interventions for students with additional needs. As part of this process, consider the fiscal implications of enabling schools to retain special education staff to provide interventions for all students if the need for these teachers is reduced because of lower incidence rates for students with IEPs.

h. **Intervention Models.** Identify models for intervention, including those for ELLs and academically advanced students. Consider how students with IEPs may access appropriate interventions with their nondisabled peers for IEP goal areas, with supplemental consultation/collaboration provided by a special educator.

1) **Communication & Feedback.** Establish a timely communication/feedback process to share solutions to implementation barriers. Several problem areas are likely to require a targeted group of knowledgeable people to resolve issues as they arise. For example, schools often have difficulty providing services with existing staff and would benefit from feedback from
individuals able to analyze the situation, give meaningful suggestions, and recommend different staffing arrangements.

2) **School-based Planning.** Use a school-based process for planning the framework’s implementation. Provide a template that includes the core components necessary to support successful inclusive practices: school-based planning, professional development, data gathering/review, and support for plan implementation. Integrate the plan with school improvement plans.

   i. **Accountability.** Include in the District’s system of accountability measurable expectations for implementing the MTSS framework. Establish, communicate, support, and monitor clear expectations and “non-negotiables,” establishing clear lines of accountability and responsibility across departments and schools, aligning them with relevant standards and guidance. Incorporate the expectations into administrator, principal, teacher, paraprofessional aides, and related-service personnel evaluations. Have schools incorporate activities into their school improvement plans that would enable them to meet these expectations.

   j. **Financial Models.** Provide examples of how schools can use funds to support MTSS implementation. Consider how funds under Title I and Title III of the Elementary and Secondary Education Act (ESEA) and Coordinated Early Intervening Services (CEIS) funds under the Individuals with Disabilities Education Act (IDEA) may be used to support MTSS. Provide other funding models for school consideration.

2. **SPECIAL EDUCATION EVALUATION PROCESS.** Target activities to assess practices for students with disabilities in high-risk areas to inform future practices.

   a. **Referrals.** Develop a system to track all referral and eligibility data, including the referral source. Maintain this information centrally and update frequently. Monitor referrals to determine if schools with a stronger MTSS program see a reduction in unnecessary referrals. Assess and monitor parent-driven referral rates at the high school to determine if better systems are needed to catch struggling students earlier.

   b. **Eligibility Review.** Develop a process to review recent eligibility documentation for students with disabilities. Use a facilitator for school-based personnel to review together random files for students with similar characteristics to identify any patterns and trends, including the extent to which students had received documented progress monitored research-based general education interventions, and their achievement growth after receiving an IEP.

   c. **Disproportionality.** Monitor the identification of students in a racial/ethnic subgroup to ensure that they are not at least two times more likely than peers to be identified as having a disability area, (i.e., risk ratios). Benchmark initial referrals and eligibility determinations by race/ethnicity in the areas of concern. Twice yearly, track whether the use of MTSS is reducing racial/ethnic disparities in initial referrals and eligibility determinations in these areas. For students who appear to be underrepresented in a disability, provide teachers with information regarding their characteristics to support the appropriate referral of students with these characteristics for an evaluation of their eligibility and any need for special education services.

   d. **ELL.** Continue and deepen collaboration efforts between departments to ensure alignment of practices. Seek out opportunities for cross-training that will allow for ELL and special education

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39 Implementing RTI Using Title I, Title III, and CEIS Funds; Implementing RTI Using Title I, Title III and CEIS Funds: Key Issues for Decision-makers at [www.ed.gov/programs/titleiparta/rti.html](http://www.ed.gov/programs/titleiparta/rti.html).
teachers to see the overlap in their work. Collect and monitor data on dually identified students to better pinpoint areas of concern.

e. **504.** Ensure schools have the necessary systems in place identify students who may require a 504 plan. Monitor schools with overly high and low rates to ensure appropriate identification. Offer training to improve staff understanding.

f. **Autism Rates.** Monitor enrollment trends of students with autism spectrum disorders. Data suggests a recent rise in the number of students with Autism in Pre-K and Kindergarten. Continued growth in the elementary grades may warrant more specialized in-district programs.

3. **ACHIEVEMENT GAP.** Maintain a district-wide and unrelenting focus on closing the special education achievement gap. Ensure instructional practices and policies support closing this gap. Provide students with IEPs supports and services in general education classrooms to support their access to rigorous Common Core curriculum. While the District has a laudable number of students currently educated in inclusive settings, take steps to ensure instruction in meaningful and supported. As part of this process:

a. **Educate.** Ensure all principals and school-based staff understand the district’s special education achievement gap and understand the commitment to close it.

b. **Define, Provide Guidelines, Training, and Expectations around Teacher Collaboration.** Consider the research base of consultation and collaboration by special educators to support general educators and their instruction of students with IEPs.\(^{40}\)

c. **Maximize the Benefits of Creating Scheduling Priorities.** Schedule students with IEPs first for general education classes. By scheduling students with IEPs first, it is much easier to plan inclusive instruction, including co-teaching, and provide accommodations and interventions that students with IEPs need. This process requires administrative support and coordination with the scheduler who is aware of modified class capacities. Unless there is a purposeful scheduling design, the outcomes are less coordinated and effective.

d. **Provide Greater Access to General Education Classes & Nondisabled Peers.** Establish a clear expectation that all students with IEPs will be provided with opportunities to interact with nondisabled peers and that IEPs will incorporate this expectation to the maximum extent appropriate. Underscore the belief that classes where the vast majority of students have IEPs are NOT considered inclusion.

e. **Study Skills.** Develop or revise the study skills curriculum to better support students’ learning and organizational needs. Consider using this time as a targeted intervention block for some students.

f. **Ensure Access to Relevant and Challenging Courses.**

1) **Advanced Classes.** Consider how course participation rates for students with IEPs may increase either immediately or in the future. Review impediments for students with IEPs to these courses and with a stakeholder group develop strategies to lessen the impediments, to increase enrollment, and to support teaching and learning of students with IEPs.

2) **CTE Programs.** Review policies that may reduce access for students with IEPs, the extent to which the criteria can be modified to facilitate greater access, and instruction can be differentiated and accommodations provided to address the needs of accepted students.

\(^{40}\) Collaborative Consultation [https://sites.google.com/site/inclusionsecondaryclassroom/collaborative-consultation](https://sites.google.com/site/inclusionsecondaryclassroom/collaborative-consultation)
4. **INCLUSION MODEL.** Strengthen the inclusion model of co-teaching at the high school to support student access to rigorous Common Core standards. Consider a multi-year plan to expand this program to grades K-8. Without appropriate training, resources, and administrative supports, the quality of and effectiveness of co-teaching classroom practices are unrealized.\(^{41}\) This point can be stated in other terms: When a district sees the benefits and invests its financial resources to place two highly skilled teachers with a distinct set of skills in the same classroom to address the needs of all students and the teachers are not prepared or supported to do so, nothing will change for students. Without support, teachers typically fall into the roles of “teacher” (general educator) and “aide” (special educator). These recommendations will lead to more successful implementation.

a. **Develop written guidelines.** Create written guidelines that provide clear expectations and directions to all and provide an institutionalized record to which all staff, including new teachers, can refer.

b. **Course scheduling for co-teaching.** Ensure there is a more appropriate distribution of students with and without IEPs to promote academic rigor in high school team taught courses. Aim to reconfigure course schedules so that no more than 40% of students have an IEP in a co-taught class. This goal can be achieved through combining CP and CPS level courses. This shift will require additional coordination and collaboration between departments.

c. **Provide consistent, on-going professional development.** Professional development serves as the basis for creating common understanding and shared experiences among all staff and provides a foundation upon which other systems change supports can be anchored. Develop a professional development plan specific to co-teaching and ensure it is embedded in the larger district-wide training plan. Create multiple avenues for this training, including more traditional workshops and also job embedded coaching (i.e., observing and providing feedback to peers as they are conducting co-teaching lessons). Coaching practices and feedback refines practices and guides educators to a deeper understanding.

d. **Develop supportive structures that allow effective co-teaching teams to create efficiency and build investment.** When co-teaching teams have spent time to develop effective communication, have established a cohesive working partnership, and are seeing positive results in student achievement, administrators must seriously consider the investment in time and effort that it takes to create an effective partnership and seek ways to maintain these teams. Develop a plan to enable successful co-teaching teams, whenever possible, to remain together from year to year. Conduct a review of co-teaching teams annually to ascertain the success of the partnership and make changes to staffing pairs when needed.

e. **Common co-teaching planning time.** Experts in co-teaching suggest that to be effective, teams should invest regularly scheduled time to co-planning, whether within a provided planning block or on their own.\(^{42}\) Equally important as the actual time spent co-planning is teachers’ preparation to plan, how they use their time, and how they use unstructured planning methods to augment their formal planning time. Provide guidance on when, where, and how often, at a minimum, co-teaching teams should collaborate.


f. **Guidance.** Develop a SPS specific ‘Guide for Inclusive Education’ and other evidence-based practices to support these outcomes. Make this information available in one electronic, web-based document that addresses:

- All disability areas with respect to the continuum of characteristics and needs of students with IEPs, including those for students with IEPs who are ELLs;
- Universal Design for Learning, differentiated instruction, and access to the MA Curriculum Frameworks within an MTSS framework;
- Flexible grouping in and outside of regular classrooms;
- Inclusive instructional models, such as co-teaching, collaborative consultation, etc.;
- Opportunity for students in special programs to interact with nondisabled peers to the maximum extent appropriate, and strategies for maximizing appropriate interactions;
- Identify which students are best served in a fully included environment and which students are best educated in specialized programs;
- Enhancing student engagement through interactive teaching;
- Effective development and use of functional behavior assessments and behavior intervention plans;
- Appropriate use of paraprofessionals and assistants in an inclusive setting;
- Problem-solving and use of data for decision-making;
- Transition support for students attending another school the following school year; and
- Guidelines for educating students outside of general education classes, regular schools, and the District.

5. **PUBLIC DAY SCHOOL.** Determine if the District would benefit from seeking a state-approved public day rate for Next Wave and Full Circle. Conduct fiscal analysis to determine potential cost recoupment for this switch.

6. **POST-SECONDARY TRANSITION PROGRAM.** Seek opportunities to expand the transition program for students with IEPs. With the very low national employment rate\(^43\) for individuals with disabilities, the provision of highly effective transition support is critical.\(^44\)

a. **Transition Coordinator.** Develop a position for a dedicated transition coordinator in the district to improve and expand upon the district’s current program.

b. **Courses Aligned with Career Opportunities.** With appropriate stakeholders, explore how high interest courses can be expanded to provide students with IEPs opportunities to experience career-related activities and to promote further education and job placement after graduation. Consider expanding access to courses at Bunker Hill Community College or other area colleges to meet this purpose.

c. **Community-based Work.** Seek out additional opportunities for community-based work options. Leverage the wealth of community options located within a short distance of Somerville High

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\(^43\) United States Department of Labor, May 2012: 69.5 percent for individuals with disabilities compared to 20.7 for those without disabilities.

\(^44\) For more information see: Evidence-Based Practices and Predictors in Secondary Transition: What We Know and What We Still Need to Know, National Secondary Transition Technical Assistance Center [www.nsttac.org/sites/default/files/assets/pdf/.../ExecsummaryPPs.pdf](http://www.nsttac.org/sites/default/files/assets/pdf/.../ExecsummaryPPs.pdf)
School. Revisit contract with vendor and determine if these services could be more efficiently coordinated within the District through a transition coordinator.

7. **TIMELINES.** Review district practices to ensure timelines are met
   a. **Electronic System.** To the extent feasible, move all paper documents to a centralized electronic format to allow for more streamlined communication and prevent the perception of lost documents.
   b. **Reports.** Develop and maintain reports that monitor status of key timelines. Share reports monthly with all principals. Regularly review these reports at senior leadership meetings.

8. **ORGANIZATION OF SPECIAL EDUCATION.** Maximize special education support to schools by increasing communication including, but not limited to, the following:
   a. **Unrelenting focus on instruction.** Clearly communicate to schools and the broader community that a key tenet of the Special Education Department moving forward is to ensure that students with disabilities make progress, to the extent possible, in the general education curriculum and receive appropriate differentiation in all classes.
   b. **Set a clear, measurable, and long term vision for the department.** Essential to the director’s job is the development of a cohesive, collaborative vision with clear expectations around the department’s goals for the next 3-5 years. The vision should include quantifiable benchmarks that detail who is responsible and the expected level of progress for each initiative. Spend time crafting this vision collaboratively to ensure stakeholder buy-in.
   c. **Foster partnerships and conduct public outreach.** Develop a special education committee so that board members and the community can obtain a deeper understanding in this area. Establish regular meetings with the Special Education Parent Advisory Council and potentially with outside advocacy groups to share departmental updates.
   d. **Organization chart.** Consider streamlining the SPS organizational chart so that the Special Education Director reports to the Assistant Superintendent. This move would likely need to occur at the discretion of the incoming Superintendent.
   e. **Supervision.** Ensure that all school-based staff (special educators and paraprofessionals) are supervised by the building principals. When necessary, the Special Education office should provide consultative support.
   f. **Change management.** Expect that all significant changes that impact a class, school, or groups of schools are communicated broadly and, to the extent possible, consider feedback from relevant stakeholder representatives, including parents.

9. **FACILITATORS.** Shift the role of the facilitator from compliance monitor to coach.
   a. **Compliance.** Shift compliance accountability to the District office and, at the building level, to principals. While facilitators should continue to be partners in ensuring timely and completed paperwork, overall accountability for compliance should fall to district and school administrators.
   b. **Training.** Continue to implement training opportunities for facilitators through Friday afternoon meetings and other forums. Review policies to determine if these trainings can be required and occur during contractual time. Ensure staff have the right skills and expertise to provide guidance to families and staff.

10. **PARAPROFESSIONAL AIDES.** Establish, implement, and monitor expectations regarding the use of paraprofessional aides and the training they need to carry out their assigned duties.
    a. **Oversight and management.** Develop clear, written protocols that outline the process for schools to request an additional aide. Ensure that the process and required documentation is clearly
described and:

1) **Scheduling.** Takes into account the student’s schedule and when assistance is required during the day to coordinate, as appropriate, with assistance for other students.

2) **Knowledgeable representative.** Includes a special education department representative with relevant knowledge/skills to observe the student during the circumstances requiring assistance, and discuss with school staff existing school resources and any reconfiguration of them to meet the student’s need.

3) **Fading.** Shows how the student will be supported to become less reliant on adult assistance and more independent with self-advocacy and other skills. For more information, see Alternatives to Overreliance on Paraprofessionals in Inclusive Schools45.

4) **Continuity of staffing.** Have relevant SPS administrators (including human resources) consider how to ensure that student needs continue to be met when teachers are absent; and how to ensure that paraprofessionals being considered for a position have a comprehensive understanding of their proposed role and responsibilities.

5) **Training.** Include paraprofessional aides in training sessions with special education teachers and develop a training plan specifically for paraprofessional aides that supplements the training offered by the staffing organization.

6) **Supervision.** Shift supervision of paraprofessionals to building principals. Ensure all paraprofessionals receive an annual evaluation, which will be used to determine whether each individual’s contract will be renewed for the upcoming year.

   b. **Collaboration.** With relevant SPS administrators, problem-solve how to provide structured collaboration time between special educators and paraprofessional aides (as well as between special and general educators).

   c. **Instruction.** Ensure all paraprofessionals have access to, have reviewed and understand the IEPs of the students they service.

11. **ASSISTIVE TECHNOLOGY.** Maximize access of students with IEPs to assistive technology.

   a. **Management.** Assign a knowledgeable special education staff member with expertise in AT to develop and oversee the district’s AT program. The first charge for this individual should be to create a multi-year AT plan.

   b. **Documentation.** Develop written documentation related to SPS’s assistive technology criteria and procedures. Along with special education administrators, have principals/designees help to disseminate the procedures widely and ensure their appropriate use by school-based personnel.

   c. **Training.** More students with IEPs can access Common Core State Standards-based curriculum when provided instruction through a universal design for learning and related assistive technology. Ensure staff at every school have training on common assistive technology devices, and provide targeted training for more specialized AT devices.

12. **DATA AND SYSTEMS.** Ensure decision-makers have access to quality data. More effectively use electronic systems to support and streamline data collection and maintenance.

   a. **Data Quality.** Develop systems and processes that allow for consistent, timely and accurate reporting of program data (such as referral and eligibility data). Data should be maintained in a format that allows for easy manipulation and analysis.

   b. **System/process review.** Work with the special education management system vendor to complete a system/process crosswalk to ensure the district is currently using the tool to its full capacity. Consider hiring an outside group to analyze the district’s use of systems and provide

45 http://www.uvm.edu/~cdci/evolve/JSEL0417%282%2982-90.pdf
recommendations to improve data quality and reporting capability.

c. **Data Integration.** Work with the special education management system and Student Information System vendors to support the electronic transfer of data (and eliminate all duplicative data entry by hand) between systems.

d. **Reporting.** Use the special education data management system to develop reports to monitor compliance and manage programs. Ensure district staff have necessary training and skillsets to manage reporting needs.

e. **Monitoring of Consent.** Use the special education management system’s reporting tools to identify students whose families have not returned required forms, such as the parental consent to evaluate. Identify the individual(s) who will be responsible for following-up with families who have not returned forms.

f. **Training.** Ensure all new staff receive dedicated training of the district’s special education data management system. Provide refresher trainings to staff as needed.

### 13. PROFESSIONAL LEARNING

Based on all of the areas in these recommendations that require professional learning for effective implementation, plan a differentiated professional learning program for all affected educators, paraprofessionals, assistants, etc. Infuse learning opportunities that are ongoing and job-embedded, including new teacher induction and leadership development. As part of this planning process consider the following provisions:

a. **National Standards.** Have the professional learning activities be consistent with national Learning First standards.\(^46\)

b. **Toolkits.** Through an instructional toolkit, include: all aspects of MTSS, including models/examples for the master schedules to support implementation; inclusive education, and evidence-based specially designed instruction; collaboration and co-planning; progress monitoring; research showing the benefits of inclusive instruction; etc.

c. **Intervention Models & Scheduling.** Identify schools that have developed effective schedules for: MTSS implementation and for most students with IEPs (including those with more complex needs) who are educated effectively in general education classes for most of the school day; and scheduled time for general/special educators, related services personnel, and paraprofessionals/aides to collaborate and co-plan. With staff from these schools, develop processes that may be replicated or improved by other schools.

d. **Cross-Functional Training.** Initiate cross-functional training of administrators and other school support groups from every educational division to expand their knowledge and ability to support school-based personnel.

e. **Mandated Training.** Consider mandating training and other approaches if necessary to ensure that staff members needing professional development receive it for specific purposes.

f. **Paraprofessionals/Assistants.** Mandate professional learning for paraprofessionals/assistants and provide it in a differentiated and targeted manner for the personnel and students for whom they are responsible. Determine how the training will be offered to enable the paraprofessionals/assistants to attend. For further information, see for example, Paraprofessionals: The “Sous-Chefs of Literacy Instruction.”\(^47\)

g. **Interschool Collaboration.** Establish ways for school personnel to share successful practices and problem-solve solutions across schools, including the identification of demonstration schools of

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\(^46\) National Staff Development Council, *Designing Powerful Professional Development For Teachers and Principals*, Dennis Sparks at www.learningforward.org/news/sparksbook/sparksbook.pdf. The document at pages 1-2 to 1-4 links a variety of national research-based reports summarizing the importance of professional development for teachers and parents.

\(^47\) [http://www.uvm.edu/~cdci/archives/mgiangre/TEC0740%281%2956-62.pdf](http://www.uvm.edu/~cdci/archives/mgiangre/TEC0740%281%2956-62.pdf)
excellence, use of exemplary school-based personnel to include as trainers, informal common
time for guided discussion, communicating use of Wiki, Google, etc.

h. Parent Involvement. With parent stakeholder and representative groups, consider how training
will be made available for families/caregivers to reinforce activities that will support the learning,
social/emotional skills, and positive behavior of their children.

i. Communication & Feedback. Establish timely communication/feedback processes to share
solutions to implementation barriers. Several problem areas are likely to require targeted groups
of knowledgeable people to resolve issues as they arise. For example, schools often have difficulty
providing services with existing staff and would benefit from feedback from individuals able to
analyze the situation, and give meaningful suggestions for instruction and use of staff.

14. TRANSPORTATION. With relevant SPS administrators, including those from Transportation, Special
Education, Technology and Finance, as appropriate, review student routes and provide training for
bus drivers.
   a. Route review. Ask the vendor to help perform a route review to ensure routes are appropriate
      for students’ needs and that buses consistently arrive to school in a timely manner.
   b. Training. Work with the vendor to provide training for bus drivers and aides that covers
      information about emotional and behavioral issues to ensure student safety.
   c. Feedback. Allow building administration and parents to provide regular feedback to Special
      Education and Finance regarding the ongoing performance of Transportation so there is increased
      transparency and accountability throughout the process.

15. PARENT AND FAMILY ENGAGEMENT. Enhance communication with parents/families by improving
the SPS Special Education websites and continued trainings.
   a. Websites. Use SPS’s website as a mechanism for keeping stakeholders aware of SPS’s activities
      relevant to the PCG recommendations and implementation status, as well as other enhancements
      and changes for special education.
   b. Trainings. Continue to offer the family forums that were initiated this year in partnership with
      the SSEPAC. Brainstorm with SSEPAC members to identify potential topics of interest to families.
   c. IEP Meetings. Review practices to ensure families can participate as active team members in the
      IEP process. Discuss with families their experiences with IEP meetings and ask them to propose
      ways the process might feel more inclusive.
   d. Facilitated IEP Process. Initiate the neutral-party facilitated IEP process for complex meetings
      (and upon request). This process has been extremely effective for enabling participants to engage
      in positive communication, reducing conflict, and focusing meetings on the needs of children.48

16. CONTRACT SERVICES. Closely review contracts with the Finance Department to determine if there
are services that many be brought in house.
   a. Psychologist. Consider hiring an additional full time psychologist in order to reduce contracted
      service costs.
   b. Transition Coordinator. Consider hiring a Transition Coordinator to oversee the district post-
      secondary transition to reduce current costs for outsourced services. Assume staff member would
      take on more responsibilities than current vendor.

48 See: http://www.ped.state.nm.us/seo/dispute/FIEP%20HANDOUT.pdf; http://www.key2ed.com/facilitated-iep-conflict-
resolution.php; http://www.pacer.org/parent/php/php-c90.pdf;
17. SPECIAL EDUCATION MANUAL. Finalize SPS’s special education manual to support user-friendly access to current procedures/practices relevant to the management/operation of special education.

a. Public Access. Provide public access to the manual by posting the document on the SPS special education webpage, and provide links to available online resources. Ensure staff is available to update the manual regularly with current information and resources.

b. Content. Include criteria, procedures and practices for each area relevant to the implementation of these recommendations, e.g., criteria for child find; referring students for a special education evaluation; inclusive instruction for preschool children; instruction for ELLs with IEPs; use of MTSS and state/local criteria (including for ELLs) for determining eligibility for SDI and advantages of early identification and support; support for ongoing needs of preschool children and school-aged students who are referred but are not evaluated or not qualified for services; expectations and tools to facilitate communication to teachers regarding the IEPspecified needs of students in each of their classes; participation of general education teachers in IEP meetings; role of various IEP participants and general/special education personnel in various circumstances; etc.

c. Collaboration with Stakeholders. Collaborate with preschool personnel, principals, other school-based groups, and SSEPAC representatives to consider information and resource links that would be useful for each relevant group to include in the manual.

d. Parents/Families. In collaboration with the SSEPAC, plan a face-to-face training to provide parents an understanding of the information in the manual. If feasible, publish a modified document appropriate for parents and/or supplement it with one-page brochures to further access to this information. Ensure training and materials are accessible to parents with diverse linguistic needs and sensory limitations.

e. Roll Out. Distribute the manual to all SPS faculty and staff. Ensure staff understand key processes and procedures in the manual, and understand how the manual can be used in their specific role. Provide training and time for staff to read the manual and ask questions. Staff should understand that the manual is the source of record for all policies, processes, and procedures regarding Special Education.
APPENDICES

Appendix A. PCG Security and Confidentiality Policy for Protected Data

Public Consulting Group (PCG) is committed to ensuring the security and confidentiality of data that is entrusted to it by its clients and others, including “protected health information” under the Health Insurance Portability and Accountability Act (“HIPAA”), “education records” under the Family Educational Rights and Privacy Act (“FERPA”), and other data that is confidential under other applicable laws, regulations, contracts, or ethical standards (collectively, “Protected Data”).

This policy codifies PCG practices and procedures relating to the security and confidentiality of Protected Data. All PCG employees are expected to read, understand, and comply with this policy. For purposes of this policy, the term “security” relates to external threats to Protected Data, such as fire and theft. The term “confidentiality” relates to improper use and disclosure of Protected Data.

Questions regarding this policy may be directed to the appropriate manager or to PCG Legal Counsel.

A. BASIC PRINCIPLES

1. PCG will maintain and use appropriate administrative, physical, and technical safeguards to reasonably protect the security, integrity, and confidentiality of Protected Data.

2. PCG will not disclose Protected Data to any employee, contractor, or other person unless that person has executed an appropriate agreement relating to the security and confidentiality of the Protected Data.

3. PCG will not use or disclose the Protected Data except as authorized in writing by the source of the Protected Data.

4. PCG will immediately investigate any reported breach of its security and confidentiality safeguards. If a breach is confirmed, PCG will notify the source of the Protected Data, and will take appropriate steps to correct the problem and to mitigate any harm.

B. SECURITY SYSTEMS

1. PCG utilizes physical and electronic systems to secure Protected Data. Physical systems include building access controls. Electronic systems include computer passwords, firewalls, virus detection software, and encryption. Employees are prohibited from bypassing these systems.

2. The Director of Information Technology Services maintains detailed procedures for PCG electronic security systems, including how the HIPAA Security Rule is addressed, and is responsible for electronic security awareness and training.

C. PROJECT REQUIREMENTS

For each project that involves the use of Protected Data, the Project Manager is responsible for ensuring and documenting compliance with: (a) the security and confidentiality requirements that are contained in the contracts under which Protected Data is made available to PCG for the project; and (b) this policy.

1. Project documents. For each project that involves the use of Protected Data, required project documents include the following: (a) this policy; (b) a HIPAA “business associate” agreement or other written agreement with each source of Protected Data, pertaining to the use and disclosure of that Protected Data; (c) agreements with any project contractors and other non-PCG individuals or entities relating to the use or disclosure of SPS Protected Data that they did not provide; and (d) the Protected Data itself.
2. Security of Electronic Protected Data. The Project Manager will consult as necessary with the Director of Information Technology Services with respect to the security of Protected Data that is held or used in electronic form. This includes encryption, the availability of secure data storage facilities, the use of computers and laptops, and the disposition of Protected Data at the end of a project (pursuant to the Project Record Retention Plan).

3. Security of Non-Electronic Protected Data. The Project Manager will consult as necessary with the appropriate office manager and Practice Area Director with respect to the security of Protected Data that is held or used in non-electronic form. This includes ensuring the availability of secure data storage facilities, and the disposition of the Protected Data after the expiration of the contract (pursuant to the Project Record Retention Plan).

4. Use of Protected Data. Protected Data may be used only for the specific purpose(s) for which it was made available to PCG, as documented in a HIPAA Business Associate Agreement or other written agreement with the entity that made the data available, or as may be required by law. To the extent that Protected Data is used or disclosed “as required by law,” rather than pursuant to the documented agreement with the source of the Protected Data, that use or disclosure will be documented in the project file.

5. Access to Protected Data. Access within PCG to Protected Data is limited to PCG employees and contractors who require such access for purposes of a project for which the Protected Data was provided. Protected Data must not be discussed or made accessible outside a secure environment.

6. Transmission of Protected Data. Protected Data may be transmitted only in a way that protects its security and confidentiality. For non-electronic data, this includes the use of a delivery service that allows packages to be tracked. For electronic data, this includes encryption.

D. TRAINING

1. Training. PCG will make available to its employees appropriate training relating to the security and confidentiality of Protected Data. To the extent appropriate, the training will focus on new developments and use actual scenarios. All PCG employees are required to complete such training.

2. Temporary employees. Training requirements apply as well to temporary employees who may have access to Protected Data.

3. Subcontractors and contractors. Training requirements may apply as well to subcontractors and other PCG contractors, depending on the nature of their work.

E. PERSONNEL RESPONSIBILITIES

All PCG employees have responsibilities relating to this policy.

1. Every PCG employee is responsible for understanding the policy, complying with the policy, and reporting violations of the policy to an appropriate supervisor or to PCG Legal Counsel. Every PCG employee is required to read and acknowledge this policy before having access to Protected Data, and to sign an acknowledgement form. The executed acknowledgement form will be kept in the employee’s personnel file.

2. Project Managers are responsible for ensuring compliance with the policy on the project, including by any temporary employees and contractors. In the event of a breach of security or confidentiality, the Project Manager is responsible for notifying PCG Legal Counsel and for taking the steps recommended by Legal Counsel to notify the source of the Protected Data, to correct the problem, and to mitigate any harm.
3. PCG Legal Counsel is responsible for implementing and maintaining the compliance program, for addressing reports of violations, and for reporting directly to senior management on the reported violations and other aspects of the compliance program. Legal Counsel also will answer employee questions regarding compliance or ethics issues. Temporary employees, subcontractors, and other contractors also are subject to this policy, except as indicated under Section C (Training).

F. REPORTS OF VIOLATIONS

1. Reports. Employees are to report violations of the policy to their supervisors, who will promptly notify PCG Legal Counsel, or directly to PCG Legal Counsel.

2. Confidentiality. Reports to Legal Counsel may be made on a confidential basis by calling the PCG Compliance Hotline, at x1129.

3. Response. Legal Counsel will log each report of non-compliance, will address each report, and periodically will report to senior management on each violation and its disposition.

4. Retaliation. Employees making a good faith report of non-compliance will not be retaliated against on account of the report.

5. Documentation. Reports of violations relating to a project will be documented in writing, and will be included in the project file as a project document along with documentation of the corrective actions taken, with an appropriate level of documentation also sent to the Director of Human Resources.

G. EVALUATIONS

1. Adherence to this policy, including the fulfillment of training requirements and the timely reporting and proper handling of violations, will be elements of employee performance evaluations.

2. The exit interview for employees leaving PCG will ask whether the employee was aware of any violations of this policy, and any reports will be investigated by Legal Counsel.

H. MONITORING

Legal Counsel and the Director of Quality Assurance will monitor the operation of this policy, and will recommend and implement any necessary modifications.

I. DOCUMENTATION

PCG will keep appropriate documentation relating to this policy. Documentation includes the project documentation required in Section C, the acknowledgments referenced in Section D, and the reports of violations and corrective actions referenced in Section F.

FERPA COMPLIANCE POLICY

In the course of providing contract services to education agencies, PCG gains access to confidential student information as necessary to perform the contracted services. PCG is committed to ensuring the security and confidentiality of the student information it receives, specifically, information contained in “education records” that must be protected from improper disclosure under the Family Educational Rights and Privacy Act (“FERPA”). PCG’s commitment to protect the confidentiality of student information is memorialized in this FERPA Compliance Policy.

All PCG employees and subcontractors with access to confidential student information are expected to read, understand, and comply with the FERPA Compliance Policy.
Questions regarding this Policy may be directed to the appropriate manager, Compliance Counsel for the Education Services Practice Area (ESPA), or to PCG’s Corporate Counsel. Individuals are also encouraged to review the FERPA federal regulations codified at 34 CFR Part 99.

A. DEFINITIONS FOR PURPOSES OF THIS POLICY

1. “Disclosure” or “disclose” means to permit access to or the release, transfer, or other communication of personally identifiable information contained in education records by any means, including oral, written, or electronic means, to any party except the party identified as the party that provided or created the record.

2. “Education records” means, with specified exceptions, those records that are (1) directly related to a student; and (2) maintained by an educational agency or institution or by a party acting for the agency or institution.

3. “Improper disclosure” means the use or disclosure of personally identifiable student information for any purpose not authorized by the client that provided PCG with the information.

4. “Personally identifiable information” or “confidential information” means:
   - the student’s name,
   - the name of the student’s parent or other family member,
   - the address of the student or student’s family,
   - a personal identifier, such as the student’s social security number or student number,
   - a list of personal characteristics that would make the student’s identity easily traceable, or
   - any other information that would make the student’s identity easily traceable.

B. PCG’S FERPA COMPLIANCE STANDARDS

1. PCG maintains and uses appropriate administrative, physical, and technical security systems to reasonably protect personally identifiable student information from improper disclosure.

2. PCG does not allow access to personally identifiable student information to any employee or subcontractor unless that individual has reviewed and signed the Acknowledgment of the PCG FERPA Compliance Policy, which contains the individual’s agreement to protect student information from improper disclosure. (Note: Execution of the Acknowledgment of Security and Confidentiality Policy for Protected Data form satisfies the signature requirement.)

3. PCG uses or discloses personally identifiable student information only as authorized by the client that provides PCG with access to the information as permitted by FERPA regulations.

4. PCG will immediately investigate any reported breach of its security and confidentiality safeguards. If a breach is confirmed, PCG will notify the LEA or SEA source of the student information, and will take appropriate steps to correct the problem and to mitigate any harm.

C. SECURITY SYSTEMS

1. PCG utilizes physical and electronic systems to secure student information. Physical systems include building access controls. Electronic systems include computer passwords, firewalls, virus detection software, and encryption. Employees are prohibited from bypassing these systems.

2. The Director of Information Technology Services maintains detailed procedures for PCG electronic security systems, including how the Health Insurance Portability and Accountability Act (HIPAA) Security Rule is addressed, and is responsible for electronic security awareness and training.
D. PROJECT REQUIREMENTS

1. For each project that involves the use of personally identifiable student information, the Project Manager is responsible for ensuring and documenting compliance with: (a) the security and confidentiality requirements that are contained in the contracts under which personally identifiable student information is made available to PCG for the project; and (b) this Policy.

2. For each project that involves the use of personally identifiable student information, required project documents include the following: (a) this Policy; (b) agreements with any project subcontractors relating to the use or disclosure of personally identifiable student information; and (c) each employee’s and subcontractor’s signed Acknowledgment of the PCG FERPA Compliance Policy.

3. The Project Manager will consult, as necessary, with the Director of Information Technology Services with respect to the security of personally identifiable student information that is held or used in electronic form. This includes encryption, the availability of secure data storage facilities, the use of computers and laptops, and the disposition of personally identifiable student information at the end of a project.

4. The Project Manager will consult, as necessary, with the appropriate office manager and Practice Area Director with respect to the security of personally identifiable student information that is held or used in non-electronic form. This includes ensuring the availability of secure data storage facilities and the disposition of the personally identifiable student information after the expiration of the contract.

5. Personally identifiable student information may be used only for the specific purpose(s) for which it was made available to PCG, as documented in a written agreement with the entity that made the information available or as otherwise authorized in writing by that entity. The agreement is maintained by the Project Manager.

6. Access within PCG to personally identifiable student information is limited to PCG employees and subcontractors who require such access for purposes of the project for which the personally identifiable student information was provided. Personally identifiable student information must not be discussed or made accessible outside of a secure environment.

7. Personally identifiable student information may be transmitted only in a way that protects its security and confidentiality. For non-electronic data, this includes the use of a delivery service that allows packages to be tracked. For electronic data, this includes encryption.

E. FERPA COMPLIANCE TRAINING

PCG will make available to its permanent and temporary employees, as well as subcontractors, training relating to FERPA compliance. To the extent appropriate, the training will focus on new developments and use actual scenarios. All PCG employees and subcontractors are required to complete such training.

F. PERSONNEL RESPONSIBILITIES

1. Every PCG employee and subcontractor is responsible for understanding the FERPA Compliance Policy, complying with the Policy, and reporting suspected violations of the Policy to an appropriate supervisor or to PCG Legal Counsel. Every PCG employee and subcontractor is required to read the Policy before having access to personally identifiable student information, and to sign the Acknowledgment of the PCG Compliance Policy. The employee’s executed Acknowledgment will be verified by the Project Manager or the individual’s immediate supervisor and kept in the employee’s personnel file maintained by the Human Resources Department. The subcontractor’s executed Acknowledgment will be verified by the Project Manager.

2. Project Managers are responsible for ensuring compliance with the Policy on the project, including temporary employees and contractors. In the event of a breach of security or confidentiality, the Project
Manager is responsible for notifying the ESPA Compliance Counsel and for taking the steps recommended by Counsel to notify the source of the personally identifiable student information, to correct the problem, and to mitigate any harm.

3. The ESPA Compliance Counsel is responsible for implementing and maintaining the compliance program, for addressing reports of violations, and for reporting directly to senior management on the reported violations and other aspects of the compliance program. Counsel will answer employee questions regarding compliance or ethics issues. Temporary employees, subcontractors, and other contractors also are subject to this Policy, except as indicated under Section C (Training).

G. REPORTS OF VIOLATIONS

1. Employees shall report suspected violations of the Policy to their supervisors, who will promptly notify PCG Legal Counsel, or directly to PCG Legal Counsel.

2. Reports to Legal Counsel may be made on a confidential basis by calling the PCG Compliance Hotline, at 617-426-2026 x1129.

3. Legal Counsel will log each report of non-compliance, will address each report, and periodically will report to senior management on each violation and its disposition.

4. Employees making a good faith report of non-compliance will not be retaliated against on account of the report.

5. Reports of violations relating to a project will be documented in writing, and will be included in the project file as a project document along with documentation of the corrective actions taken, with an appropriate level of documentation also sent to the Director of Human Resources.

H. EVALUATIONS

1. Adherence to this Policy, including the fulfillment of training requirements and the timely reporting and proper handling of violations will be elements of employee performance evaluations.

2. The exit interview for employees leaving PCG will ask whether the employee was aware of any violations of this Policy, and any reports will be investigated by ESPA Compliance Counsel.

I. MONITORING

ESPA Compliance Counsel, in conjunction with PCG’s Corporate Legal Counsel, will monitor the operation of this Policy, and will recommend and implement any necessary modifications.
Appendix B. District Data Reviewed

1. For all enrolled SPS students (with & without IEPs), the number of:
   a. Students by race/ethnicity
   b. Students by grade level and school
   c. Students who are English Language Learners
   d. Students who are eligible for Free and Reduced Lunch
2. The number of all SPS students w/IEPs & by disability areas:
   a. The number of all SPS students w/IEPs by race/ethnicity
   b. The number of all SPS students w/IEPs who are English Language Learners
3. Performance. Percentage of students with/without IEPs meeting/exceeding proficient standard in reading and math performance for the last school year.
4. Graduation. Number of students with IEPs who graduated with a regular diploma.
5. Drop-out. Number of students with IEPs who have dropped out of school.
6. Suspensions/Dismissals/Expulsions. For students with/without IEPs, number suspended for total school days last school year & by grade level.
7. Educational Settings (least restrictive environment) for all students with IEPs. Using the federal educational setting criteria, e.g., students w/IEPs in general education setting 80% or more of the time, between 40-80% of the time, less than 40% of the time, special schools (public & private), provide the numbers:
8. Out of District. Number of students by grade level and disability in an out of district placement.
9. Special Programs. For all students in special programs, the number:
   a. By grade level & school
   b. Number of special program classes by grade level & school
10. Staffing. Number of FTE staff (including contractual) in the following areas:
    a. Special education teacher
    b. Paraprofessional + assistants for students with IEPs
    c. Psychologists
    d. Social Workers
    e. Nurses
    f. Occupational Therapists
    g. Physical Therapists
11. Coursework. Classes taken by Students with IEPs at the High School:
    a. Advanced Classes (Honors and AP)
    b. Co-Taught classes
    c. Career Technology Education (CTE) classes
Appendix C. Documents Provided by the District

1. Special Education Staff Numbers, 2014-2015
2. Special Education Facilitator Job Description
3. Curriculum and Instructions Interventions, Elementary and High Schools
4. Research Based Interventions for General Ed Students
5. Re-Entry for Hospitalized Students
7. Special Education Disability Definitions and Related Links from MA ESE
8. Overview of the Special Education Program
9. 2015 Projections Memo from Special Education
10. Age Appropriate Transition Assessment Toolkit
11. Information of Transition Services, 2015
12. Special Education Personnel Caseloads and Workloads, 2015
13. Job Description for One-on-One Paraprofessional Aid
14. FY15 Staffing Plan
15. Due Process, 2015
16. Home Language Tracking Form
17. Notice of Proposed School District Action Forms: N1, N1A, N2, N3, N3A
19. Transition Planning Form
20. Special Education Definitions of Eligibility Categories from MA ESE
21. Letter of Refusal due to No Response
22. List of Special Education Technology
23. Flyer for Parent Information Night with SSEPAC: PBIS Night
24. High School Referral Log, 13-14
25. Kennedy Referral Log, 14-15
26. Academic Evaluation Template
27. Description of Extended School Year Program
28. Professional Development for Facilitators
29. February 2015 Staff Memo
30. Inclusion Proposal Letter to Parents
31. MCAS Strategies
32. Oral Interpretation Form for IEP Meetings
33. Organization of Paraprofessionals, 14-15
34. Organization of Professionals, 14-15
35. Flyer for Parent Information Night with SSEPAC: Vacationing with your Child with Disabilities
36. Staff Updates from September 2014 Staff Meeting
37. Staff Updates from November 2014 Staff Meeting
38. Special Education Staff Welcome Letter
39. SPS School Improvement Plans
40. Financial information Including:
   a. Special Education Budget, FY15
   b. SPS Contracted Services for Special Education
   c. Transportation Routes
   d. District Budget Information
Appendix D. PCG Team

**Anna d’Entremont**, a Senior Consultant at PCG, brings extensive education and management experience to this project. She has a strong background in understanding the organizational policies and practices essential to support the instructional needs of students with disabilities. Prior to joining PCG, Anna was the Director of Operations of the Edward W. Brooke Charter School in Boston, MA. In this role, she served as co-director and the operational leader of a high-performing K-8 urban charter school. Anna also worked as a Program Officer at New Visions for Public Schools, where she managed a diverse portfolio of initiatives designed to support and develop innovation in 85 new small high schools across New York City. In this role, she led small high schools to design inclusive learning environments for their students with disabilities and ensured schools met district and state requirements for this population. She has also contributed to the successful creation of three New York City charter schools, where she wrote their special education policies and procedures. Anna began her career as bilingual kindergarten teacher for the Houston Independent School District and as an elementary school ESL teacher in the DC Public Schools. She is also a Teach for America alumna, completed graduate coursework in the Teaching of ESL at the University of St. Thomas, and received her Ed.M. in Education Policy from Teachers College, Columbia University in Education Policy.

**Dr. Jennifer Meller**, a Senior Consultant at PCG, brings expertise at the district level in the areas of data use and fiscal policy as applied to special education, behavioral health and school health services. She is a member of the PCG Education teams currently working on special education assessment projects across the country, technology implementation projects in Santa Fe, NM and Houston, TX, and business development efforts for Colorado, New Mexico, and Wyoming. Jennifer also served as the project manager for the Bill & Melinda Gates Foundation on a research engagement designed to inform the Foundation’s Data Team about current educational trends and develop a strategy for future data grant portfolio investments in the data space. Prior to joining PCG, she was Director of Operations in the School District of Philadelphia’s Office of Specialized Instructional Services, where she focused on implementing student-focused data management systems and oversaw several multi-million dollar federal grants. This work received written commendation from the Pennsylvania Department of Education (Bureau of Special Education) and recognition from other urban school districts. Jennifer earned a MS.Ed. in Higher Education Management and an Ed.D. in Educational and Organizational Leadership, both from the University of Pennsylvania. She also has a B.A. in English from Dickinson College.

**Alexandra Panetta**, a Business Analyst at PCG, provides data analysis and project support to various strategic planning and special education review engagements. In addition, she supports the day to day operations of PCG’s Response to Intervention (RtI) system (EdPlan) for Cambridge Public Schools (MA) and offers project management support to PCG’s statewide Education Data Portal Program in the state of New York. Ms. Panetta is a graduate from the College of the Holy Cross in Worcester, MA and is a lifelong resident of Massachusetts.

**Annelise Eaton**, a Business Analyst, provides project management, data analysis, and project support for PCG Education clients. Annelise is currently assisting in the development of a communications plan to
showcase the success of the Massachusetts Race to the Top program. She has recently provided logistical coordination for the Connecticut State Department of Education’s Systems of Professional Learning, involving 210 professional development sessions, 12 launch events, and a series of webinars focused on Common Core implementation. In this capacity, Annelise oversees event management for all sessions and directs participant communication efforts. She also facilitates weekly calls to coordinate between project team members, facilitators, participants, and other stakeholders. Annelise previously worked at Harvard Law School, where she developed communications materials, managed the website, and provided meeting facilitation for the Public Service Venture Fund. Annelise is a graduate of Boston College, where she received a B.A. in English and a M.A. in Developmental and Educational Psychology.

Patricia Crowley, a Special Education Subject Matter Expert, served as an advisor for this project. Ms. Crowley currently offers direct consulting services, mentoring, and support to Boston Public Schools and recently finished an engagement with Lawrence Public Schools, MA. She comes to PCG Education with more than 30 years’ experience as a senior administrator in special education in Boston Public Schools. In this role, she had direct accountability for assuring compliance with state and federal regulations as well as the court ordered mandates. These responsibilities included: the designing, aligning and implementing of systems to ensure quality assurance of timelines, service delivery and a continuum of services; development and training of systemic policy and procedures; interfacing IEP goals with curriculum standards; and, providing ongoing operational technical support. She has also served as a guest lecturer at several universities, including Harvard University, Boston University, and Boston College, in special education regulations compliance and accountability.
Appendix E. Explanation of Terms

The following is a list of terms used in the report with a brief explanation of their meaning. When applicable, website addresses are provided for more information. Appendix H lists the terms by their acronyms.

**Assistive Technology (AT)** includes a piece of equipment or product system that may be used by a person with a disability to perform specific tasks, improve functional capabilities, and become more independent. It can help redefine what is possible for people with a wide range of cognitive, physical, or sensory disabilities. AT can ensure that students with disabilities receive a free and appropriate public education (FAPE) by allowing access to the general education curriculum and settings, providing opportunities for active participation with same age peers, and facilitating progress toward their educational goals. In addition, AT can significantly impact independence, self-expression, self-esteem, and overall quality of life (http://www.vats.org/Default.htm).

**Common Core State Standards (CCSS)** are rigorous grade-level expectations have been established for instruction in English language arts (ELA) and math. These standards identify the knowledge and skills students need to be successful in college and/or careers. A fundamental CCSS goal is the promotion of a culture of high expectations for all students (http://www.corestandards.org/).

**Differentiated Instruction** is tailored to the learning preferences of different learners. Learning goals are the same for all students, but the method or approach of instruction varies according to the preferences of each student or what research has found works best for students like them (http://www.ed.gov/technology/draft-netp-2010/individualized-personalized-differentiated-instruction - see also, http://www.diffcentral.com/index.html).

**Emotional/Behavioral Disability (EBD), or Emotional Disturbance (ED).** A disability that adversely affects a child’s educational performance due to any of the following characteristics: inability to learn that cannot be explained by intellectual, sensory or health factors; an inability to build or maintain satisfactory interpersonal relationships with peers and teachers; inappropriate types of behavior or feelings under normal circumstances; a general pervasive mood of unhappiness or depression; a tendency to develop physical symptoms or fears associated with personal or school problems. Schizophrenia is included under this disability (http://idea.ed.gov/explore/view/p/,root, regs,300,A,300%252E8,c,).

**Early Childhood (EC).** Refers to children ages zero to eight (0-8). During this time period children experience significant brain growth which is their foundation for learning and development later in life (http://www.unesco.org/new/en/education/themes/strengthening-education-systems/early-childhood/). In the context of special education, early childhood services are offered to young children who are at risk of developmental delay or disability. In most cases early childhood services refer to interventions or services prior to a child becoming school-aged (0-5, or through PreK). With a referral, some services are available at birth (http://www.parentcenterhub.org/repository/ei-overview/).
English Language Arts (ELA). Defined as “the subjects (reading, spelling, literature, and composition) that aim at developing the student's comprehension and capacity for use of written and oral language” (http://www.merriam-webster.com/dictionary/language%20arts).

English Language Learners (ELL). Individuals learning the English language in addition to their native language http://www.hhs.gov/ocr/civilrights/resources/specialtopics/lep/index.html).

Individuals with Disabilities Education Act (IDEA) provides federal funding to state and local education agencies and requirements for the provision of special education and related services to eligible school-aged students with disabilities. The law also provides funding and requirements for early intervention services for children birth through two (http://idea.ed.gov/).

Individualized Education Program (IEP). A written document that is developed, reviewed, and revised in a meeting based on detailed IDEA requirements. The IEP has various components including each student’s present levels of academic achievement/functional performance; measurable annual goals and benchmarks/short-term objectives; progress monitoring; services and program modifications/supports; the educational setting for services; assessment requirements; and postsecondary transition services and activities (http://nichcy.org/schoolage/iep/iepcontents).

Intellectual Disability (ID). Also called mental retardation, this disability means significantly sub-average intellectual functioning, existing concurrently with other deficits in adaptive behavior which manifest during the developmental period and adversely affect a child’s educational performance (http://idea.ed.gov/explore/view/p/2Cro%2Cregs%2C300%2CA%2C300%252E8%2C).

Least Restrictive Environment (LRE). A core principle of Section 504 and IDEA that states to the greatest extent possible, children with disabilities are to be educated with other children who are not disabled. Separate classes, facilities, and removal of children from the general education setting only occur in cases when the nature or severity of the child’s disability prevents the student from adequately performing, even with the help of supplementary aids and services. A child whose needs can be met by modifications, and supplementary services or aids should not be removed from an age appropriate classroom. In this context, LRE refers to the amount of time a child with disabilities spends in the general education setting. Inclusion in general education more frequently, or higher percentages of time in general education are seen as a less restrictive environment. On the contrary, separate classes or schools are seen as more restrictive, as it takes students with disabilities away from their non-disabled peers (http://idea.ed.gov/explore/view/p/,root,statute,I,B,612,a,5.).

Massachusetts Comprehensive Assessment System (MCAS). The MCAS is the state’s standardized assessment system and is administered starting in grade 3. The 10th grade assessment is part of the MA state graduation requirements. Subtests include Mathematics, English Language Arts and Science, Technology, and Engineering (http://www.doe.mass.edu/mcas/overview.html).
Massachusetts Department of Elementary and Secondary Education (ESE). The Massachusetts state department of education (http://www.doe.mass.edu/).

Multi-Tiered System of Supports (MTSS) is a framework supports the early identification of students struggling in academic and behavioral areas so that they may be provided with systematically applied strategies and targeted instruction at varying levels of intervention. It is an educational practice designed to ensure that all students have access to effective instruction and support to achieve positive outcomes. It is designed to reduce achievement gaps for all students, including general education students, English Language Learners (ELLs), and students receiving special education services. In addition, through this process students who are excelling may be identified and provided with enriched instruction and activities (Common Core State Standards and Diverse Students: Using Multi-Tiered Systems of Support) (http://rtinetwork.org).

National Research Council (NRC). Part of the National Academy of Sciences and the National Academy of Engineering, the National research council’s mission is to improve government decision making and public policy. The NRC provides research for six major areas; Behavioral and Social Sciences and Education, Earth and Life Studies, Engineering and Physical Sciences, Policy and Global Affairs, Transportation Research Board, and the Gulf Research Program (http://www.nationalacademies.org/nrc/).

Occupational Therapy (OT). Services provided by a qualified professional that contribute to improving, developing or restoring functions impaired or lost through illness, injury, or deprivation; improving ability to perform tasks for independent functioning if functions are impaired or lost; and preventing, through early intervention initial or further impairment or loss of function (http://idea.ed.gov/explore/view/p/,root,regs,300,A,300%252E34).

Office for Civil Rights (OCR) The U.S. Department’s Office for Civil Rights has the responsibility for enforcing various civil rights laws pertaining to school districts, including Section 504 (http://www2.ed.gov/about/offices/list/ocr/index.html).

Office of Special Education Programs (OSEP) is the federal office that is dedicated to improving results for infants, toddlers, children and youth with disabilities ages birth through 21 by providing leadership and financial support to assist states and local districts (http://www2.ed.gov/about/offices/list/osers/osep/index.html?src=rnr).

Other Health Impairment (OHI). Impairment, generally stemming from chronic or acute health conditions, that adversely affects a child’s educational performance by limiting strength, vitality, or alertness. Health problems contributing to OHI may include asthma, attention deficit disorder, epilepsy, sickle cell anemia, or Tourette syndrome (http://idea.ed.gov/explore/view/p/%2Croot%2Cregs%2C300%2CA%2C300%252E8%2C).
Physical Therapy (PT). A related service provided by physical therapists to assist a child with a disability succeed in the educational environment by reducing pain, and improving or restoring physical mobility (http://idea.ed.gov/explore/view/p/root,regs,300,A,300%252E34,, http://www.apta.org/AboutPTs/).

Professional Development (PD). In education, professional development refers to a “comprehensive, sustained, and intensive approach to improving teachers’ and principals’ effectiveness in raising student achievement”. This may include any activity sponsored by the school or conducted by qualified professionals that enhances staffs’ effectiveness in the classroom by promoting job embedded training or coaching. Other PD activities to support these goals include workshops, institutes, conferences, and memberships to educational organizations or associations (http://learningforward.org/who-we-are/professional-learning-definition#.VMqiPGh4qsg).

Related Services. Transportation and such developmental, corrective, and other supportive services as are required to assist a child with a disability to benefit from special education, and includes speech-language pathology and audiology services, interpreting services, psychological services, physical and occupational therapy, recreation, including therapeutic recreation, early identification and assessment of disabilities in children, counseling services, including rehabilitation counseling, orientation and mobility services, and medical services for diagnostic or evaluation purposes. Related services also include school health services and school nurse services, social work services in schools, and parent counseling and training (http://idea.ed.gov/explore/view/p/root,regs,300,A,300%252E34,).

Response to Intervention (RtI). Rigorous implementation of RtI includes a combination of high quality, culturally and linguistically responsive instruction; assessment; and evidence-based intervention. Comprehensive RtI implementation will contribute to more meaningful identification of learning and behavioral problems, improve instructional quality, provide all students with the best opportunities to succeed in school, and assist with the identification of learning disabilities and other disabilities (http://www.rti4success.org).

Section 504 of the Rehabilitation Act of 1973 (Section 504 or 504) is a civil rights law that prohibits discrimination based on disability in any program or activity receiving federal financial assistance (http://www2.ed.gov/about/offices/list/ocr/docs/edlite-FAPE504.html).

Specially Designed Instruction (SDI) for children with disabilities is a requirement under IDEA. SDI refers to the teaching strategies and methods used by teachers to instruct students with learning disabilities and other types of learning disorders (http://learningdisabilities.about.com/od/publicschoolprograms/g/sdidefinition.htm’).

Specific Learning Disability (SLD). Disorder in one or more of the basic psychological processes involved in understanding or in using language, spoken or written. It includes the imperfect ability to listen, think, speak, read, write, spell or to do mathematical calculations. This extends to perceptual disabilities, brain injury, minimal brain dysfunction, dyslexia, and developmental aphasia (http://idea.ed.gov/explore/view/p/%2Croot%2Cregs%2C300%2CA%2C300%252E8%2C).
Speech/Language Impairment Disability (S/L). Disorder that impacts child’s ability to communicate and adversely affects academic performance, like stuttering, impaired articulation, language impairment, or voice impairment (http://idea.ed.gov/explore/view/p/%2Croot%2Cregs%2C300%2CA%2C300%252E8%2C).

State Performance Plan (SPP). IDEA requires states to monitor school districts under an SPP that includes baseline data, targets and improvement activities for indicators specified by the U.S. Department of Education (http://www2.ed.gov/fund/data/report/idea/partbspap/index.html).

Title 1 is one section of the No Child Left Behind Act of 2001, which provides funds to school districts to improve the academic achievement of children from low-income homes. Funding is based on a minimum percentage of children from low-income families, typically the percentage of students eligible to receive free and reduced-price lunch (http://www.greatschools.org/definitions/nclb/nclb.html).

Transition Services. IDEA defines "...transition services as a coordinated set of activities for a student designed within an outcome oriented process, that promotes movement from school to post school activities, including post-secondary education, vocational training, integrated employment (including adult services, independent living, or community participation)." APS coordinates implementation of transition activities for students with disabilities from preschool age to young adulthood (http://www.doe.virginia.gov/special_ed/transition_svcs/index.shtml).

Universal Design for Learning (UDL). Through a UDL approach, curriculum is initially designed with the needs of all students in mind so that methods, materials, and assessment are usable by all (www.udlcenter.org/).

Universal Screening. In the context of an RtI/MTSS prevention model, universal screening occurs for all students to help identify those who are at risk for learning difficulties (www.rtinetwork.org).

United States Department of Education (USDE). An agency within the executive branch of the federal government, the USDE establishes policy, administers and coordinates most federal assistance to education. The office of Special Education Programs (OSEPS) is an office with the USDE (http://www2.ed.gov/about/landing.jhtml).


### Study of Somerville Public Schools Special Education Services

#### Appendix F. SPS Staffing Ratios Compared to Other Districts

<table>
<thead>
<tr>
<th>School District</th>
<th>Total Enrollment</th>
<th>% SpEd</th>
<th>SpEd Enr Number</th>
<th>Ratio To:</th>
<th>Incidence</th>
<th>Special Educator</th>
<th>Paraprofessional</th>
<th>Speech/Language</th>
<th>Psychologist</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lincoln</td>
<td>1,060</td>
<td>12%</td>
<td>128</td>
<td>21</td>
<td>21</td>
<td>7</td>
<td>5</td>
<td>5</td>
<td>2</td>
</tr>
<tr>
<td>Saugus, MA</td>
<td>3,012</td>
<td>15%</td>
<td>462</td>
<td>28</td>
<td>29</td>
<td>17</td>
<td>108</td>
<td>16</td>
<td>104</td>
</tr>
<tr>
<td>Agawam Public Schools</td>
<td>4,347</td>
<td>15%</td>
<td>656</td>
<td>39</td>
<td>100</td>
<td>17</td>
<td>112</td>
<td>7</td>
<td>44</td>
</tr>
<tr>
<td>ESD 112</td>
<td>13,764</td>
<td>14%</td>
<td>1,987</td>
<td>55</td>
<td>158</td>
<td>37</td>
<td>251</td>
<td>13</td>
<td>88</td>
</tr>
<tr>
<td>Sun Prairie Area S Dist</td>
<td>6,656</td>
<td>10%</td>
<td>697</td>
<td>62</td>
<td>93</td>
<td>12</td>
<td>108</td>
<td>8</td>
<td>72</td>
</tr>
<tr>
<td>Kalamazoo Pub Schools</td>
<td>12,100</td>
<td>14%</td>
<td>1,667</td>
<td>70</td>
<td>79</td>
<td>24</td>
<td>173</td>
<td>22</td>
<td>154</td>
</tr>
<tr>
<td>Everett Public Schools</td>
<td>6,100</td>
<td>17%</td>
<td>1,049</td>
<td>74</td>
<td>51</td>
<td>15</td>
<td>83</td>
<td>21</td>
<td>178</td>
</tr>
<tr>
<td>Burlington Township SD</td>
<td>4,606</td>
<td>14%</td>
<td>648</td>
<td>75</td>
<td>95</td>
<td>9</td>
<td>61</td>
<td>7</td>
<td>48</td>
</tr>
<tr>
<td>Oak Park SchDist 97</td>
<td>5,400</td>
<td>16%</td>
<td>875</td>
<td>78</td>
<td>90</td>
<td>12</td>
<td>70</td>
<td>10</td>
<td>60</td>
</tr>
<tr>
<td>Cleve Hts-UnivHtsCty</td>
<td>6,000</td>
<td>18%</td>
<td>1,100</td>
<td>83</td>
<td>58</td>
<td>14</td>
<td>73</td>
<td>19</td>
<td>104</td>
</tr>
<tr>
<td>Somerville, MA</td>
<td>4,987</td>
<td>21%</td>
<td>1,048</td>
<td>85</td>
<td>90</td>
<td>12.3</td>
<td>58.7</td>
<td>11.6</td>
<td>55.4</td>
</tr>
<tr>
<td>West Aurora, IL SD</td>
<td>12,725</td>
<td>13%</td>
<td>1,688</td>
<td>120</td>
<td>101</td>
<td>14</td>
<td>106</td>
<td>17</td>
<td>126</td>
</tr>
<tr>
<td>Lakota Local Kyrene School Dist</td>
<td>18,500</td>
<td>10%</td>
<td>1,800</td>
<td>126</td>
<td>120</td>
<td>15</td>
<td>147</td>
<td>15</td>
<td>155</td>
</tr>
<tr>
<td>Marlborough Public Sch</td>
<td>4,835</td>
<td>25%</td>
<td>1,198</td>
<td>141</td>
<td>124</td>
<td>9</td>
<td>112</td>
<td>13</td>
<td>145</td>
</tr>
<tr>
<td>Naperville IL 203</td>
<td>16,903</td>
<td>12%</td>
<td>1,978</td>
<td>150</td>
<td>137</td>
<td>13</td>
<td>120</td>
<td>8</td>
<td>76</td>
</tr>
<tr>
<td>Cambridge Pub Schools</td>
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<th>General Ed Students</th>
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<td>8%</td>
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<td>19%</td>
<td>523</td>
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<td>73</td>
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<tr>
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<td>12%</td>
<td>592</td>
<td>16</td>
<td>133</td>
</tr>
<tr>
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<td>8,603</td>
<td>18%</td>
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<td>11%</td>
<td>2,500</td>
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# SPS Staffing Ratios Compared to Other Districts: Social Workers, Nurses, Occupational Therapists & Physical Therapists

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<th>Location</th>
<th>Total Student Enrollment</th>
<th>Total Special Ed Enrollment</th>
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<th>Nurses</th>
<th>Occupational Therapists</th>
<th>Physical Therapists</th>
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<td>All</td>
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Study of Somerville Public Schools Special Education Services

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