Special Education Program Evaluation

for the York County School Division

Contents

Chapter 1: Introduction

The York County School Division (YCSD, the Division) contracted with Gibson Consulting Group (Gibson) to conduct an evaluation of the Division's Special Education program. This program is led by the Office of Student Services (OSS). Gibson conducted this review over a 12-month period between December 2018 and November 2019. The evaluation included an in-depth analysis of the Division's Special Education programs and services, organizational structure, staffing, policies, and processes. Gibson also solicited feedback from division staff and parents through interviews, focus groups and on-line surveys.

This report presents the results of Gibson's review of YCSD's Special Education program. It includes observations of program strengths and areas in need of improvement, and makes specific recommendations for YCSD to consider as the Division continues its efforts to improve services for students with disabilities.

Gibson wishes to thank the Office of Student Services, YCSD leadership, other Division and school-based administrators and staff, and parents for their assistance in conducting this program review.

Executive Summary

Located in Yorktown, Virginia, YCSD enrolled nearly 13,000 students in 2018-19. Over the past 5 years, YCSD student enrollment increased at a modest rate of 2.1 percent, while the number of students with disabilities increased 17.9 percent over this same time period.[1] In 2018-19, students with disabilities accounted for 11.2 percent of the total student population, which is 2 percentage points below the state average (13.2 percent). Nearly one-third (32 percent) of all YCSD students are military connected, which is the highest rate of military connectedness across all school divisions in Virginia. YCSD reports that families move to the area specifically for its educational programming and special education services in particular.

YCSD students with disabilities achieve significantly higher outcomes than peer divisions and the state average across all content areas. The Division also performs at a higher level in most content areas among other non-peer divisions with similar percentages of economically disadvantaged students. These performance levels and comparisons largely mirror those of the Division's general education program, indicating that YCSD's Tier 1 instructional program, combined with the Division's increasing commitment to inclusionary practices, is likely contributing to the success of YCSD students with disabilities.

This report contains 21 recommendations to further improve the effectiveness and efficiency of the YCSD Special Education program. Below is a summary of the major observations and recommendations in the report.

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[1] For purposes of this evaluation, "students with disabilities" refers to students with an IEP and served by the special education program.

Program Organization and Management

- The current organizational structure of the OSS more closely resembles the organization of a much smaller school system. The Director of Student Services position has an unusually large number of direct reports (21), requiring too much time to be dedicated to the transactional demands normally assigned to supervisory and lower level staff. This, in turn, has reduced the amount of time that can be dedicated to overall departmental management and performance monitoring. The organizational structure also does not represent a logical alignment of key functions, this limiting the ability to extend accountability for performance into the department. The review team recommends reorganizing the OSS, having fewer direct reports to the director position, and establishing or redefining supervisory positions to improve functional and program performance accountability.

- YCSD spends less on its Special Education program (per student with disabilities) than peer divisions and other benchmarks, and per-student spending has been relatively flat in recent years. There also appears to be an opportunity for YCSD to significantly increase its Medicaid revenue.

- The Division does not devote sufficient staff resources to the validation and analysis of student data, and the current approach to data management and analysis is highly decentralized. Data integrity issues surfaced during this evaluation, and while YCSD is in the stages of implementing a data dashboard, additional efforts are needed to ensure the accuracy of data and the use of meaningful information to support decisions at the division, program, school, and student levels.

- Other than the state required minimums established for certain positions, the Division does not have its own staffing formulas or guidelines to ensure adequate and efficient staff levels. Operating procedures and job descriptions also need to be updated and evaluated periodically to ensure procedural efficiency, effectiveness and compliance.

Program Implementation

- The current approach to inclusion is highly burdensome on general education teachers. The review team found that too many high need students (special education and others) are concentrated in single classrooms, co-teaching best practices are not applied, and implementation of inclusion is inconsistent within and across school types. YCSD should develop a model for inclusion and improve support for its implementation.

- Individualized Education Program (IEP) files lack academic rigor, and several exceptions were noted that may create compliance risks for YCSD. The Division should develop standards for IEPs and conduct periodic audits to ensure that both quality and compliance standards are met.

- While Response to Intervention (RtI) is not technically part of special education, as a system of intervention strategies, it significantly affects referral to the Special Education program. The review team found that RtI is not consistently implemented across schools, its procedural documentation is not complete, and RtI data are not sufficiently tracked or analyzed to support

decision-making and RtI effectiveness. YCSD should update (RtI) standard operating procedures and centrally monitor RtI data at the division and school levels.

- Other recommendations include providing increased professional development and guidance to IEP teams with respect to student placements, reviewing programs to ensure a full continuum of services for all students, expanding efforts to improve student behavior support systems, and improving parent communication and involvement.

Implementation of these and other recommendations contained in this report will help YCSD achieve even higher levels of success.

Project Objectives and Scope

The overarching objective of this Special Education program review is to solicit feedback from program stakeholders and identify opportunities for improving programs and services to students with disabilities in YCSD. The primary questions that this review sought to address were:

- What is the quality of special education services in YCSD as evidenced by historical trends in student performance outcomes, program participation, and comparisons with similar schools and divisions?

- Are YCSD's Special Education programs and services appropriately organized, staffed, structured, and supported?

- Are students effectively identified, evaluated, and placed in special education?

- Are special education programs and services meeting the needs of students in YCSD?

- To what extent are staff and parents satisfied with the continuum of services provided to special education students in YCSD?

Project Approach and Methodology

The observations and recommendations included in this report were informed by the following information gathering and analytical activities.

Literature Review

Gibson conducted a comprehensive and systemic review of research on best practices in special education programming and service delivery, which was used to inform the development of the parent and staff survey instruments and interview guides. A summary of Gibson's methodology is contained in *Appendix B – Literature Review* and the full annotated bibliography and database was provided as a supplemental deliverable to this report.

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Data Analysis and Benchmarking

Gibson collected and analyzed historical data provided by YCSD, which included special education student demographic data and enrollment trends, program expenditure data, staffing data, school data, student performance and outcome data, state performance plan indicator data, and other program-specific information. To provide additional context, Gibson also benchmarked YCSD to six peer school divisions, which were selected in collaboration with YCSD based on similarity in size and demographics. Gibson also compared YCSD to the state average, where applicable. All comparisons were made using publicly available data from the Virginia Department of Education. Table 1.1 provides a brief summary of the comparator school divisions.

Table 1.1. Profile of Benchmark Divisions, 2018-19

Division	Total Enrollment	% Special education	% Economically Disadvantaged
Albemarle County	14,013	12.5%	29.4%
Culpeper County	8,235	10.6%	45.9%
Fauquier County	11,189	13.8%	25.4%
Frederick County	13,627	13.0%	33.2%
Rockingham County	11,930	9.7%	42.4%
Suffolk City	14,265	12.6%	48.7%
York County	**12,972**	**11.2%**	**22.1%**

Source. Virginia Department of Education.

Individualized Education Program File Review

The review team conducted a detailed assessment of 25 student IEPs. The primary objective of the IEP file review was to assess whether or not IEPs are compliant, of high quality, and follow best practice standards. In general, a quality IEP is in compliance with all requirements of state and federal laws and regulations and provides a clear statement of expected outcomes and the special education services and supports to be provided to the student. The IEP review was conducted using a rubric, developed by Gibson, to assess file completeness, compliance, placement decisions, and quality of documentation, such as instructional goals and objectives, reporting of student progress toward objectives, and behavior intervention plans. The results of the IEP file review are contained in *Appendix C – IEP File Review*.

Interviews and Focus Group Sessions

In March 2019, the review team was on-site and conducted 18 individual interviews and 10 focus group sessions with division leadership, Office of Student Services administrators and staff, related service providers, principals, assistant principals, special education and general education teachers, and para-educators. The primary objective of the interviews and focus group sessions was to gather anecdotal information about YCSD's special education programs and services and to assess stakeholder perceptions

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regarding areas of strength and opportunities for improvement. A complete list of interviewees and focus group sessions can be found in *Appendix A – List of Interviews, Focus Groups and School Visits*.

School Visits and Classroom Observations

While on-site, the evaluation team also visited six schools where they conducted interviews with principals and/or assistant principals, and visited between three to five classrooms. Schools were selected based on school level (elementary, intermediate, high), geographic location, and location of specialized programs. Using a protocol developed by Gibson, the review team observed the instructional service delivery model, instructional practices, levels of student engagement, and availability and use of technology resources, including assistive technology. A list of the schools visited is included in *Appendix A – List of Interviews, Focus Groups and School Visits* and a copy of Gibson's classroom observation protocol is contained in *Appendix D – Classroom Observation Protocol.*

Staff Survey

Online surveys were administered to all school board office staff, school administrators, teachers, and para-educators who work with special education students, either directly or indirectly. The staff survey instrument was designed to solicit staff feedback with respect to their levels of job satisfaction, school culture, professional learning, performance management, multi-tiered systems of supports, special education programs and services, parental involvement and communication, student behavior and discipline, IEP development, and instructional practices.

The staff survey was administered between April 12, 2019 and May 2, 2019, with an overall response rate of 67 percent. More information on the staff survey instrument and methodology is contained in *Appendix E – Staff Survey Methodology and Instrument*.

Parent Survey

Online surveys were administered to all parents who had a child with an IEP enrolled in YCSD during the 2018-19 school year. The parent survey instrument was designed to solicit staff feedback with respect to parent satisfaction with quality of special education services, level of parent involvement, communication from YCSD, and transportation services. The parent survey was administered between April 28, 2019 and June 2, 2019.

Parents submitted a total of 319 surveys of the 1,561 surveys sent, yielding just over a 20 percent overall response rate. A comprehensive summary of parent survey responses is contained in *Chapter 5 – Parent Insights and Satisfaction* and a description of the parent survey instrument and methodology is contained in *Appendix F – Online Parent Survey Methodology and Instrument*.

Parent Telephone Interviews

Semi-structured telephone interviews were conducted in May 2019 and June of 2019 with a select group of 34 parents who had a child with an IEP enrolled in YCSD during the 2018-19 school year. Parents were

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selected for a telephone interview if they did not participate in the online survey due to the lack of a valid email address and/or SMS-capable cell phone on file with the Division; some parents in this group were also selected because their child was eligible for Free or Reduced Price Lunch.

Parents were asked a series of questions regarding their overall satisfaction with YCSD's Special Education programs and services; communications from campus administrators and staff; their child's IEP; opportunities for parent involvement; and, any barriers that they or their child encounter when receiving special education instruction and/or services. The parent telephone interview protocol and a description of the methodology is included in *Appendix G – Parent Telephone Interview Methodology and Protocol.*

Report Organization

The remainder of this report is organized into the following chapters and appendices:

Chapter 2 – Academic Profile

Chapter 3 – Program Organization and Management

Chapter 4 – Program Implementation

Chapter 5 – Parent Insights and Satisfaction

Appendices:

  A. List of Interviews, Focus Groups and School Visits

  B. Literature Review

  C. Individualized Education Program (IEP) File Review

  D. Classroom Observation Protocol

  E. Staff Survey Methodology and Instrument

  F. Online Parent Survey Methodology and Instrument

  G. Parent Telephone Interview Methodology and Protocol

As a supplement to this report deliverable, Gibson has also provided an annotated bibliography (as part of the Literature Review) and Excel file of parent and staff survey response data (de-identified).

Chapter 2: Academic Profile

This chapter presents an academic profile of the York County School Division's (YCSD) Special Education Program. In this chapter, academic trends of students with disabilities are shown in trend analyses and comparative analyses, including comparisons to YCSD peer divisions, non-peer divisions with similar and different percentages of economically disadvantaged students compared to YCSD, and the state average. For purposes of this report, students with disabilities are those students with an Individualized Education Program (IEP) and accordingly receive special education services. The selection of peer divisions and their profiles are presented in Chapter 1 – Introduction.

Overall, YCSD students with disabilities perform at a higher level on the selected performance measures compared to the state average and compared to peer divisions, and the performance differences between YCSD, peer divisions, and other divisions in Virginia largely mirror those of non-disabled students. YCSD trend analyses show mixed results, with increases in some content areas, decreases in others, and fluctuating performance patterns in others over the past three years. This variability across the years selected for inclusion in the study are generally consistent with state trends. YCSD also compares favorably with non-peer divisions with a similar percentage of economically disadvantaged students.

Academic Performance

This section presents the longitudinal academic outcomes of YCSD students with disabilities relative to general education students within YCSD, and to students with disabilities in other divisions in Virginia. In addition, longitudinal comparisons are made between students with disabilities and general education students with benchmark data for the 2018-19 school year.

The longitudinal and benchmark analyses focus on two outcome domains: passing rates on Virginia standardized state assessments and four-year cohort completion and dropout rates. Regular and alternate assessments are included in the analysis; however, in the 2018-19 school year, more than 90 percent of YCSD special education students took the Standards of Learning (SOL) assessment in each content area. In YCSD, the highest rate of alternative assessment test-taking for students with disabilities was on the English Writing assessment (13.6%) and the English/Reading assessment (10%).

Student performance on the Virginia standardized state assessments are disaggregated by the content area of the assessment: English/Reading, English/Writing, Mathematics, History and Social Science, and Science. These overarching content domains include a mixture of end-of-grade and end-of-course assessments that masks variation in student performance across grade levels and end-of-course tests. Nonetheless, the aggregated performance measures provide an overall portrait of the performance of YCSD students who receive special education services across time and compared to a subset of benchmark divisions.

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Virginia Standardized Assessments

All English/Reading and Mathematics standardized assessments approved by the Virginia Board of Education are included in the following analyses. These include the Standards of Learning, Virginia Alternative Assessment Program, Virginia Modified Achievement Standards Test, and the Virginia Grade Level Alternative Assessment.

- The Standards of Learning (SOL) for Virginia Public Schools establish minimum expectations for what students should know and be able to do at the end of each grade or course in English, Mathematics, Science, History/Social Science and other subjects.

- The Virginia Alternate Assessment Program (VAAP) is designed to evaluate the performance of students with significant cognitive disabilities who are working on academic standards that have been reduced in complexity and depth. This content is derived from the Standards of Learning (SOL) and is referred to as the Aligned Standards of Learning (ASOL).

- The Virginia Modified Achievement Standards Test (VMAST) is intended for students with disabilities who are being instructed in grade level content but are not likely to achieve proficiency in the same timeframe as their non-disabled peers. VMAST uses the same standards and curriculum frameworks as the SOL assessments; however, how achievement is assessed is modified.

- The Virginia Grade Level Alternative (VGLA) is designed for the population of students with disabilities who are unable to participate in the SOL assessments, even with accommodations, and who do not meet the participation criteria for the VAAP.

Passing rates reflect students who achieved a score that met the Pass/Proficient or Pass/Advanced for the respective assessment in each testing year.

Figure 2.1 presents a 3-year trend analysis of YCSD student performance on the Virginia standardized assessments compared to the state average – for students with disabilities and students without disabilities.[1] Comparisons of student performance data over time should be interpreted in the context of two important factors:

- The 2018-19 testing year was the first year that revisions to the testing and graduation requirements approved by the Virginia Board of Education were effective. The revisions reduced the number of SOL tests required for graduation by exempting students from having to take additional end-of-course SOL exams if they had previously met the testing requirement in the

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[1] The labels "general education students" and "students without disabilities" are used interchangeably throughout the report to refer to students who are not identified as having a disability and are not receiving special education services.

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same content area. This rule changed the composition of high school students who are included in each content area end-of-course test sample in 2018-19 compared to prior school years.

- Revised mathematics standards and new SOL assessments aligned to the revised standards were implemented in 2018-19. Statewide passing rates on the mathematics assessments increased across all major student demographic subgroups.

As Figure 2.1 shows, between 2016-17 and 2018-19 the percentage of students with disabilities who met the passing standard on the English/Reading assessment declined slightly (from 62.1% to 61.3%), while the percentage of students with disabilities who met the Mathematics passing standard rose approximately four percentage points (65.8% to 69.3%). Across both assessment domains, the gap between students with disabilities and general education students was large: in 2018-19, for the English/Reading test, students with disabilities were approximately 30 percentage points less likely to meet the passing standard than their counterparts who did not receive special education services (61.3% compared to 91.6%).

The performance gap between students with disabilities and students who did not receive special education services was narrower, however, on the Mathematics assessment compared to the English/Reading test, but still large (26 percentage points).

Figure 2.1. Percentage of Students who Met the Passing Standard on Virginia English/Reading and Mathematics Assessments, 2016-17 to 2018-19
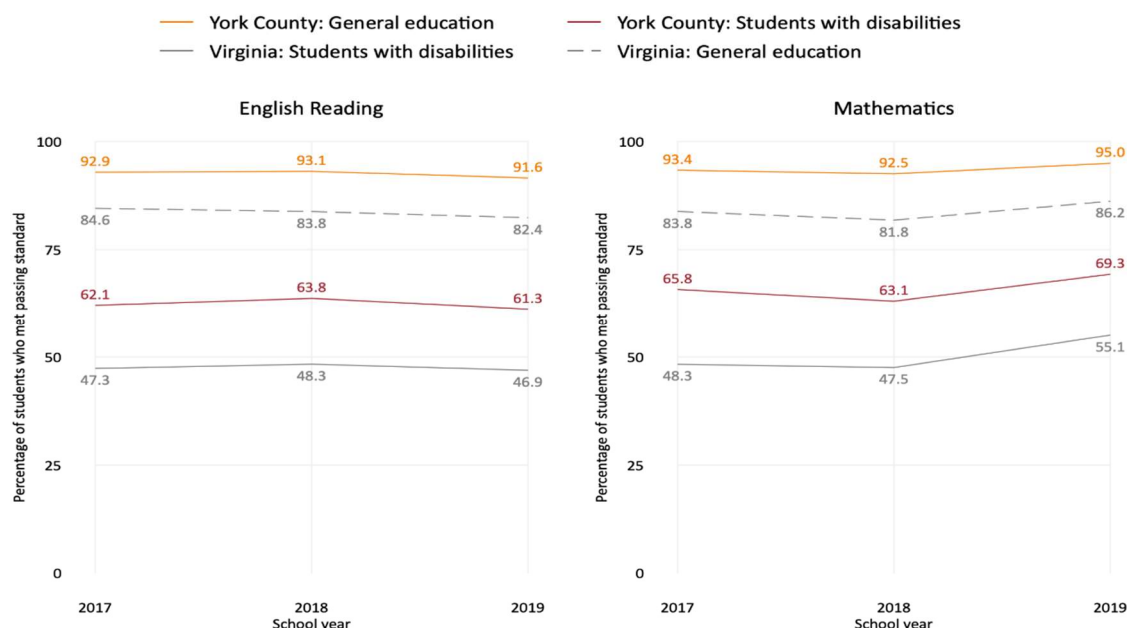
Source. Standardized testing data obtained from the Virginia Department of Education's Build-A-Table online data query tool.

Despite the performance disparities between special education and general education students *within* YCSD, special education students in YCSD outperformed students with disabilities in other divisions in every year examined in the study, and across both the Mathematics and English/Reading assessments. During the 2018-19 school year, for instance, the overall passing rates among YCSD students with disabilities on the Mathematics (69.3%) and English/Reading (61.3%) assessments were in the 95th percentile of all passing rates for students with disabilities in other divisions throughout Virginia. Put another way, of the 132 school divisions in Virginia with at least one student with disabilities who took the Mathematics or English/Reading assessments, only five percent (or five divisions for the Mathematics test and six divisions for the English/Reading exam) had passing rates among students with disabilities that exceeded YCSD.

Figure 2.2 presents comparisons of YCSD performance on state standardized assessments to the peer divisions and non-peer divisions for 2018-19. Passing rates are segmented into three groups: YCSD, YCSD peer divisions (denoted by the red markers), and all other divisions in Virginia (represented by the gray markers). In addition, passing rates are plotted against the percentage of all students enrolled in each division who participated in the National School Lunch Program (NSLP) (horizontal axis), allowing an additional comparison between YCSD and other Virginia divisions with a similar proportion of

economically disadvantaged students.[2] The horizontal blue line delineates the position in the distribution of test scores for the respective assessment that is associated with the top five percent of divisions in Virginia.

This data reveals a similar pattern of high performance on standardized Mathematics and English/Reading tests among YCSD students with disabilities compared to the six peer divisions and compared to non-peer divisions with a similar percentage of students who participated in the NSLP. The Mathematics and English/Reading passing rates of YCSD students with disabilities exceeds those of all of the selected comparison divisions, and all divisions with a similar proportion of students who participate in the NSLP. The performance gaps between YCSD and peer divisions are sizable, ranging between 25 and 17 percentage points on the English/Reading assessment, and 24 and 15 percentage points on the Mathematics assessment.

Figure 2.2. Percentage of Students with Disabilities who Met the Passing Standard on Virginia Mathematics and English/Reading Assessments, YCSD, Peer Divisions, and Non-Peer Divisions, 2018-19
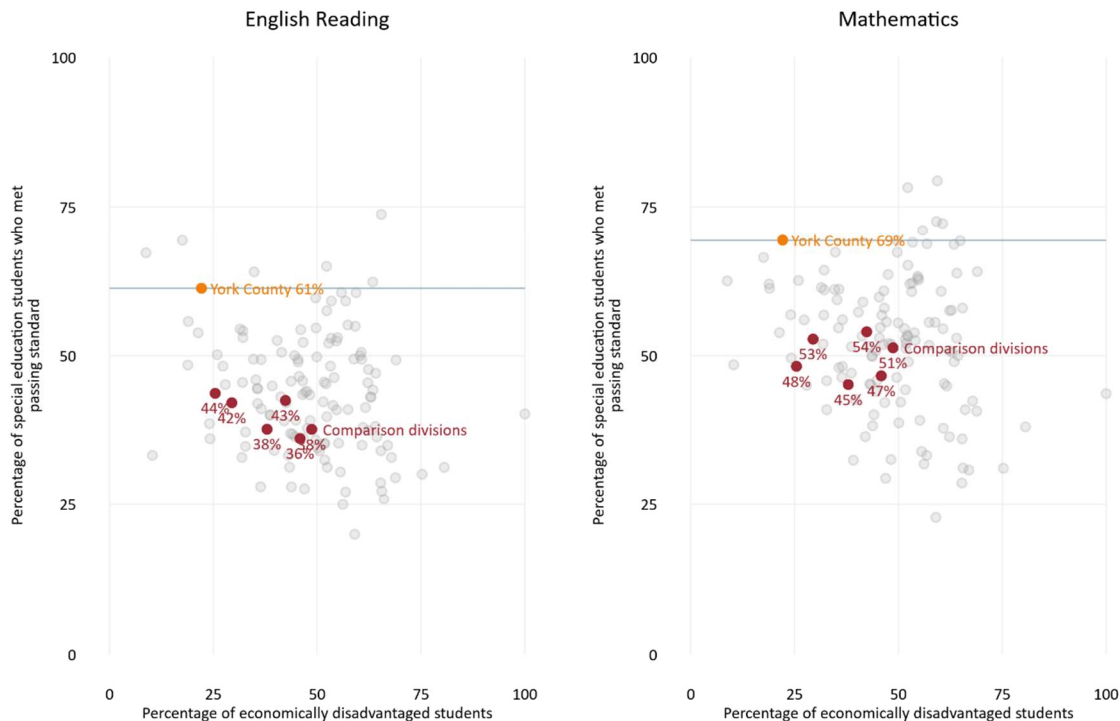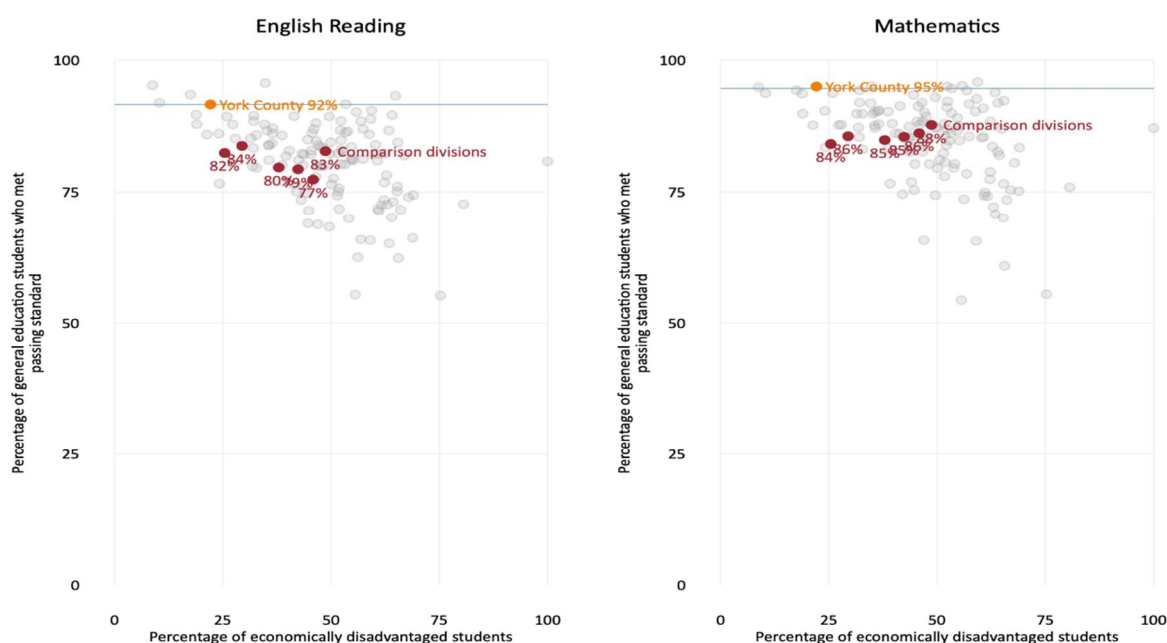

Source. Standardized testing data obtained from the Virginia Department of Education's Build-A-Table online data query tool.

Figure 2.3 presents general education student performance on state standardized assessments in 2018-19 for English/Reading and Mathematics. Similar to performance by students with disabilities, the YCSD

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[2] It is important, however, not to overstate the equivalence of divisions with a comparable share of economically disadvantaged students. That is, divisions with a similar percentage of economically disadvantaged students may differ in other important ways that contribute to academic performance.

general education passing rates are also higher than peer and non-peer divisions. In 2018-19, 92 percent of YCSD students met the passing standard on English/Reading assessments, and 95 percent met the passing standard on Mathematics assessments. While the magnitude of the difference between YCSD general education students and peer divisions was smaller than the difference between students with disabilities, YCSD general education students outperformed their counterparts in each of the peer school divisions. The largest performance gap was 15 percentage points in English/Reading and 11 percentage points in Mathematics. For both assessments, YCSD performance according to passing rates placed them in the top five percent of all divisions in Virginia in 2018-19.

Figure 2.3. Percentage of General Education Students who Met the Passing Standard on Virginia Mathematics and English/Reading Assessments, YCSD, Peer Divisions, and Non-Peer Divisions, 2018-19

Source. Standardized testing data obtained from the Virginia Department of Education's Build-A-Table online data query tool.

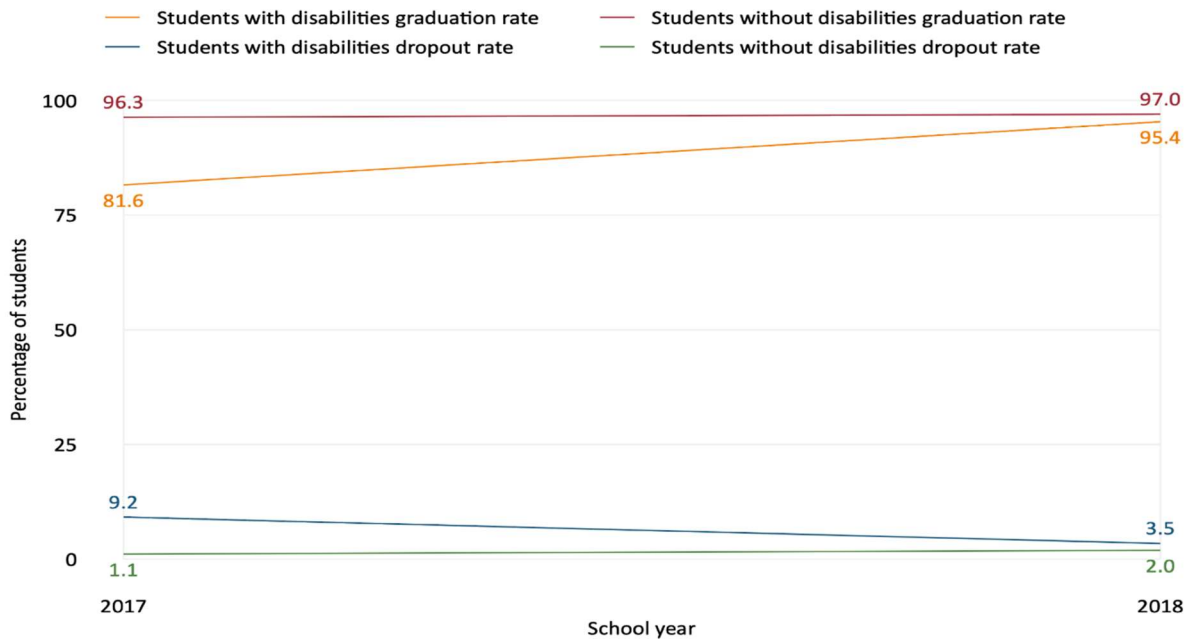## On-time Cohort Graduation and Dropout Rates

Graduation and dropout rates are calculated for two cohorts: first-time entering 9th graders in 2013-14 (2017) and 2014-15 (2018). The 2017 cohort includes 76 students with disabilities and 898 general education students, and the 2018 cohort includes 87 students with disabilities and 970 general education students. To be classified as having graduated within four years, a student must have earned an approved diploma within four years of entering high school as a 9th grader for the first time.[3]

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[3] More detailed information describing the methodology for calculating the on-time graduation rate can be found at http://www.doe.virginia.gov/statistics_reports/graduation_completion/cohort_reports/calculating.pdf.

Figure 2.4 presents an analysis of cohort graduation and dropout rates for YCSD. For YCSD students entering the 9th grade in the 2014-15 cohort, 97 percent of students without disabilities, and 95.5 percent of students with disabilities graduated on-time within four years of entering high school (spring of 2018). While the on-time graduation rate between the 2013-14 (spring 2017 graduates) and 2014-15 cohorts was stable for students without disabilities, the on-time graduation rate jumped precipitously between these years for students with disabilities (13.8 percentage points, from 81.6% to 95.4%). The on-time cohort graduation rate for special education students in YCSD varied considerably since the 2015 graduation year (2011-12 entering freshmen): for 2011-12 entering freshman, 84 percent graduated in the spring of 2015, 92 percent of 2012-13 entering freshman graduated by the spring of 2016.

The dropout rate performance trend mirrored the graduation rate performance, as the dropout rate for students with disabilities in 2017 (9.2%) was significantly higher than 2018 (3.5%).
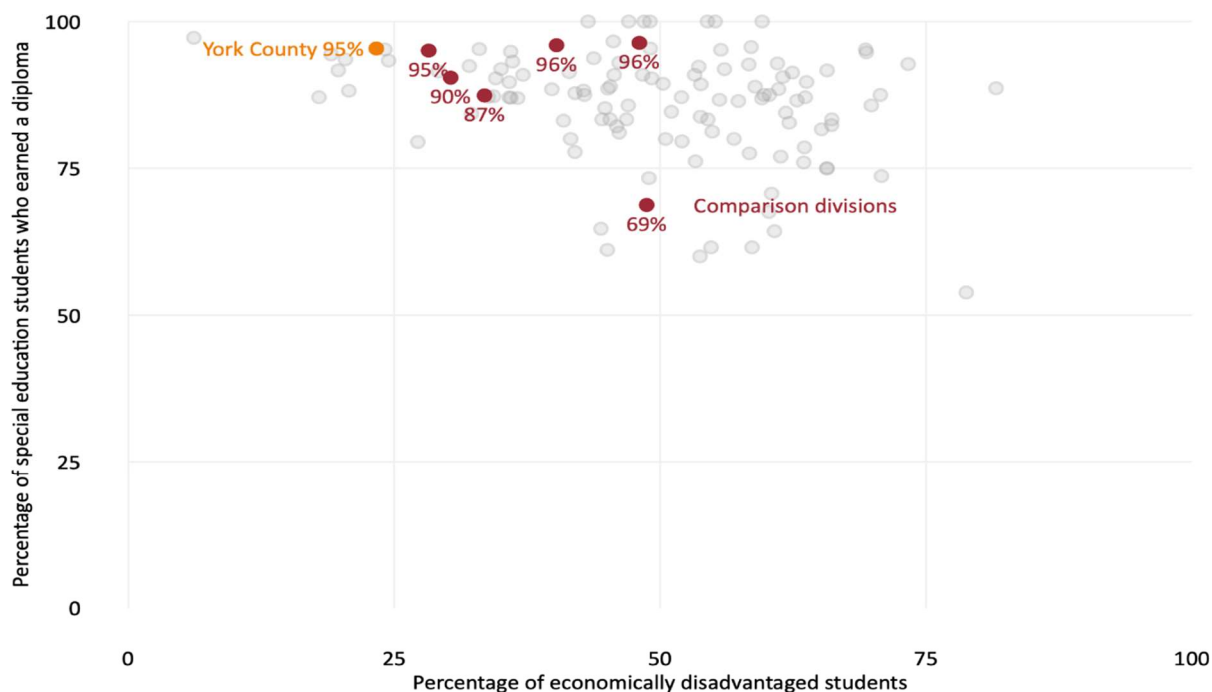
Figure 2.4. Graduation and Dropout Rates, YCSD Students With and Without Disabilities who Graduated or Dropped out within Four Years, 2017 and 2018

Source. Virginia on-time cohort graduation and dropout data were obtained from the annual On-Time Graduation Rate and Cohort Dropout Rate files available through the Virginia Department of Education website.

Figure 2.5 compares YCSD graduation rates of students with disabilities to peer divisions and non-peer divisions. The on-time graduation rate for students with disabilities who were members of the 2014-15 entering cohort (spring 2018 graduates) in YCSD was higher than the rate of four of the six peer divisions. Two divisions, Culpeper County (96.4%) and Rockingham County (96%) had an on-time graduation rate higher than YCSD.

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Figure 2.5. Percentage of Special Education Students who Earned a Diploma by Spring 2018, YCSD, Peer Divisions, and Non-Peer Divisions, 2018 (2014-15 Entering 9th Grade Cohort)

Source. Virginia on-time cohort graduation and dropout data were obtained from the annual On-Time Graduation Rate and Cohort Dropout Rate files available through the Virginia Department of Education website.

Figure 2.6 compares YCSD dropout rates of students with disabilities to peer divisions and non-peer divisions. The dropout rates for students with disabilities who were members of the 2014-15 entering cohort (spring 2018 graduates) in YCSD was lower than the rate of four of the six peer divisions. The same two peer divisions had a dropout rate lower than YCSD.
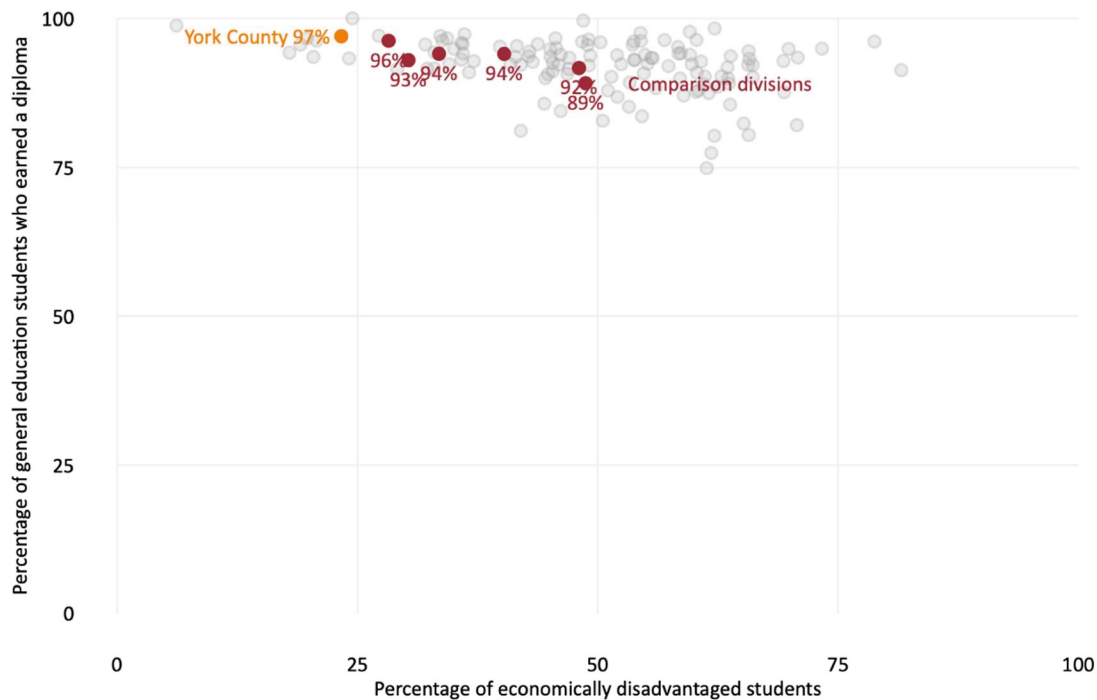
Figure 2.6. Percentage of Special Education Students who Dropped Out by Spring 2018, YCSD, Peer Divisions, and Non-Peer Divisions, 2018 (2014-15 Entering 9th Grade Cohort)
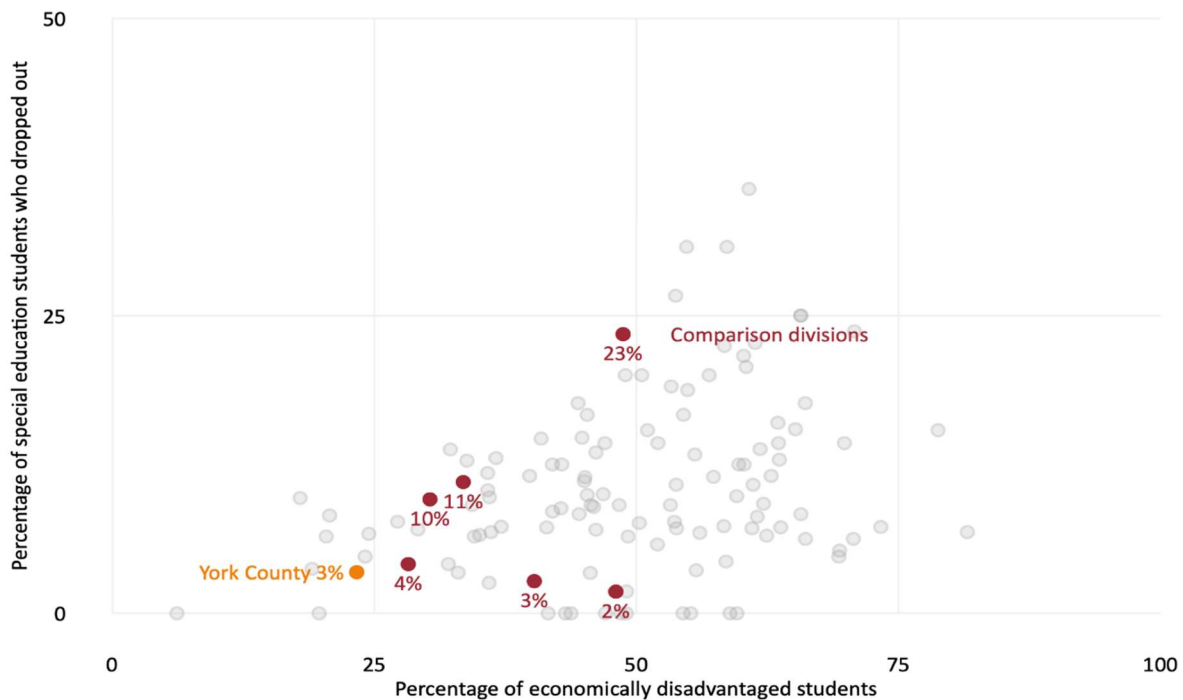
Source. Virginia on-time cohort graduation and dropout data were obtained from the annual On-Time Graduation Rate and Cohort Dropout Rate files available through the Virginia Department of Education website.

Among general education students, YCSD members of the 2014-15 graduation cohort were more likely to graduate on-time, and less likely to drop out, than cohort members from other peer divisions (Figures 2.7 and 2.8). Ninety-seven percent of YCSD cohort members who did not receive special education services graduated within four years, compared to between 96% and 89% of general education students in peer divisions.

Figure 2.7. Percentage of York County, Peer Division, and Virginia General Education Students who Earned a Diploma by Spring 2018, 2014-15 Entering 9th Grade Cohort, by Division

Source. Virginia on-time cohort graduation and dropout data were obtained from the annual On-Time Graduation Rate and Cohort Dropout Rate files available through the Virginia Department of Education website.

Similar patterns are seen in the general education dropout rates in Figure 2.8.

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Figure 2.8. Percentage of General Education Students Who Dropped Out by Spring 2018, YCSD, Peer Divisions, and Non-Peer Divisions, 2018 (2014-15 Entering 9th Grade Cohort)
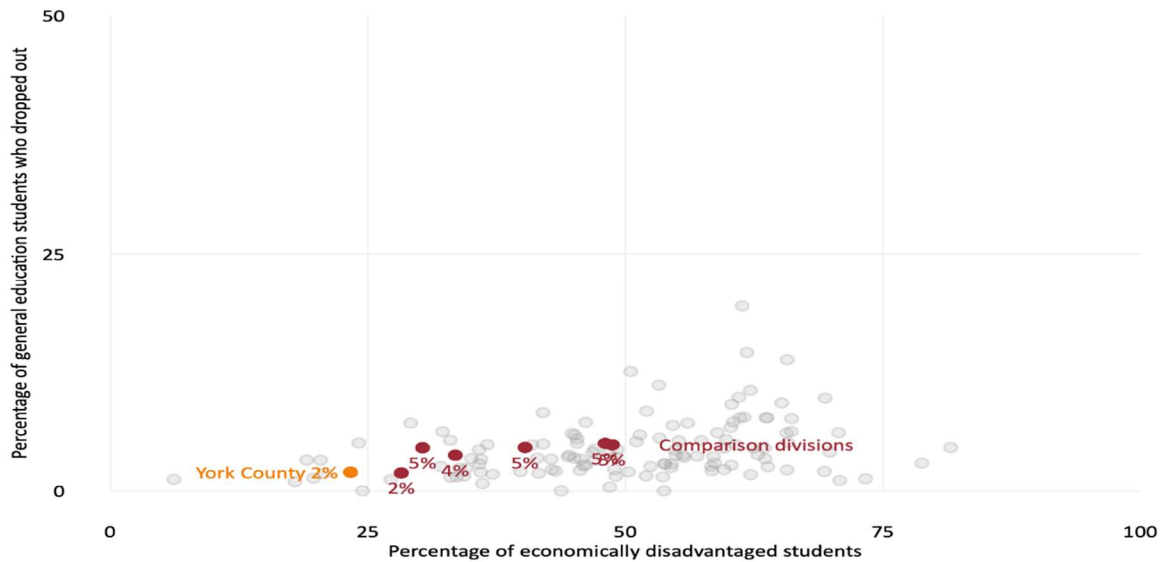

Source. Virginia on-time cohort graduation and dropout data were obtained from the annual On-Time Graduation Rate and Cohort Dropout Rate files available through the Virginia Department of Education website.

Content Area Assessments

This section presents additional trend and peer division graphical analyses of statewide assessment results by content area, for students with and without disabilities. These analyses show varying trends that are largely consistent with state performance trends, but for each content area (English/Writing, History and Social Science, and Science), YCSD performance by students with and without disabilities exceeds that of each peer division and the state average. YCSD performance also exceeds that of most non-peer divisions with similar percentages of economically disadvantaged students.
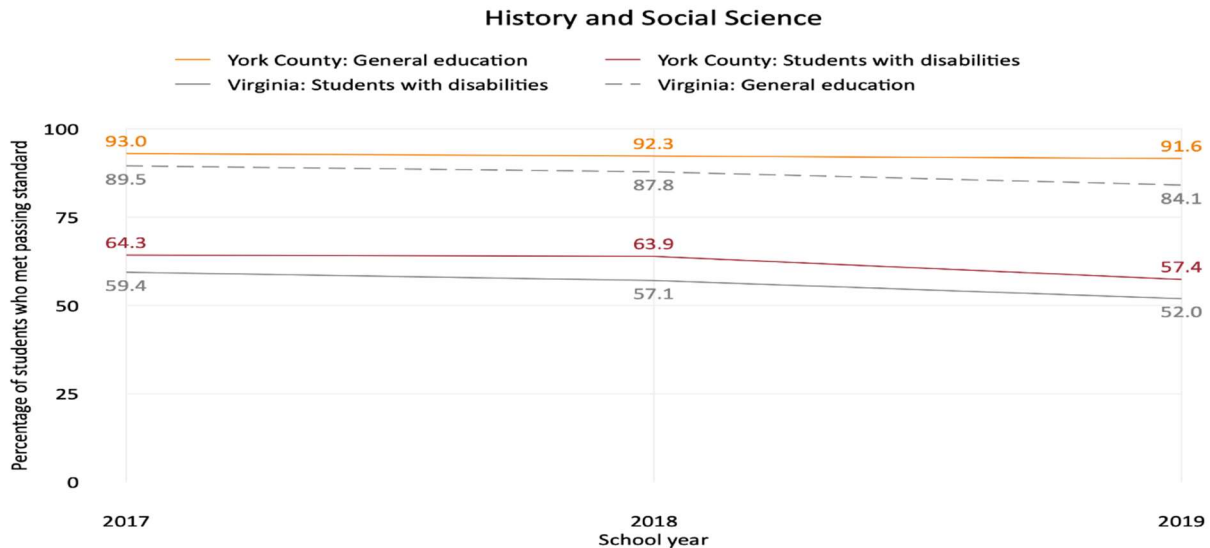
Students With Disabilities

Figure 2.9. Percentage of York County and Virginia Students Who Met the Passing Standard on Virginia State English/Writing Assessments, by Student Special Education Status, 2016-17 to 2018-19
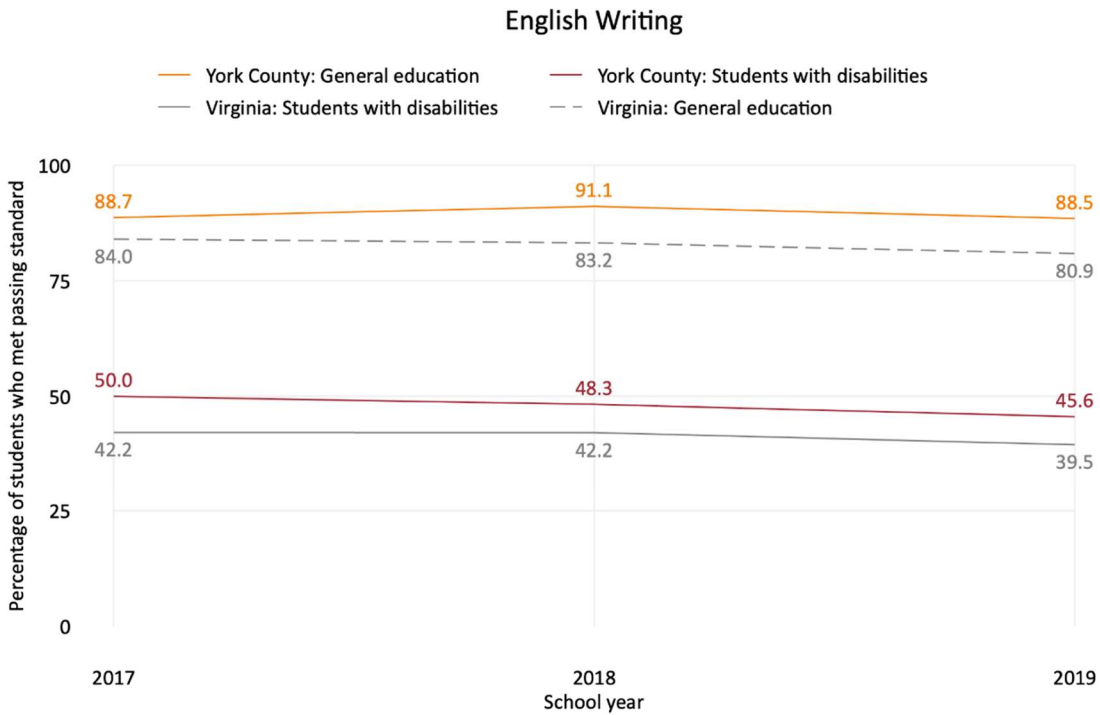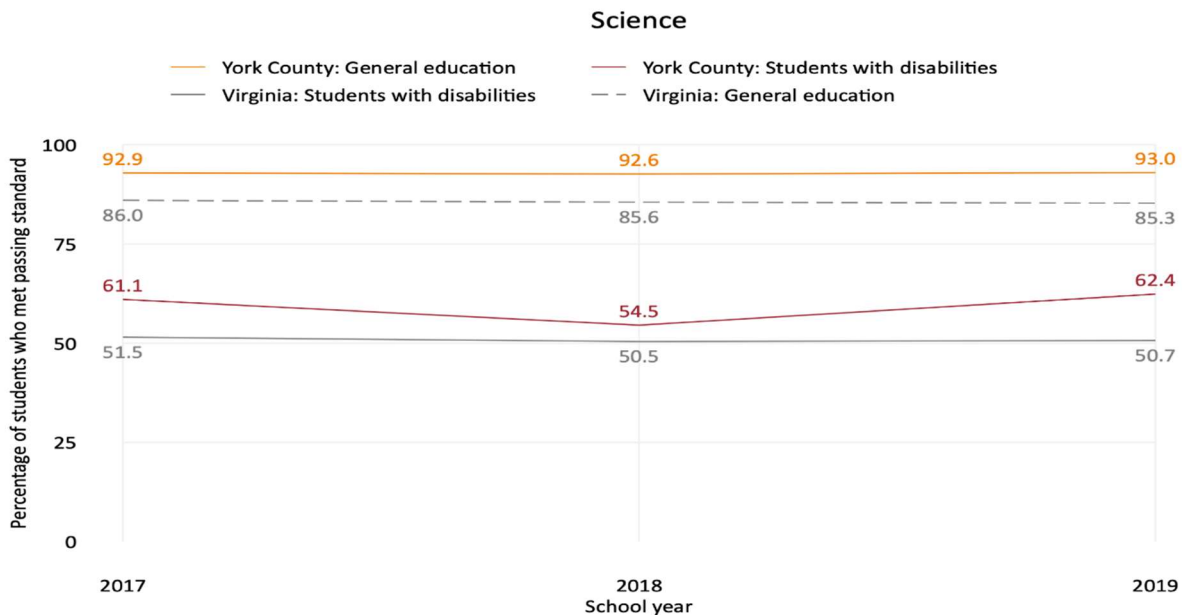

Source. Standardized testing data obtained from the Virginia Department of Education's Build-A-Table online data query tool.

Figure 2.10. Percentage of York County and Virginia Students Who Met the Passing Standard on Virginia State History and Social Science Assessments, by Student Special Education Status, 2016-17 to 2018-19

Source. Standardized testing data obtained from the Virginia Department of Education's Build-A-Table online data query tool.

Figure 2.11. Percentage of York County and Virginia Students Who Met the Passing Standard on Virginia State Science Assessments, by Student Special Education Status, 2016-17 to 2018-19

Source. Standardized testing data obtained from the Virginia Department of Education's Build-A-Table online data query tool.

Figure 2.12. Percentage of York County, Peer Division, and Virginia Special Education Students Who Met the Passing Standard on Virginia State English Writing Assessments, 2018-19
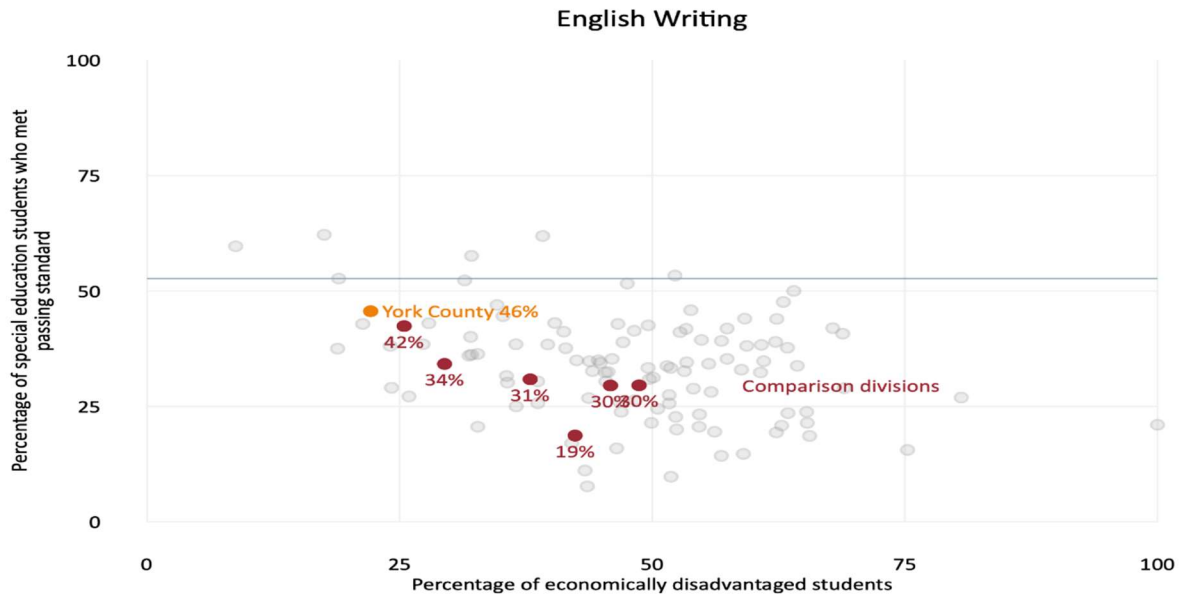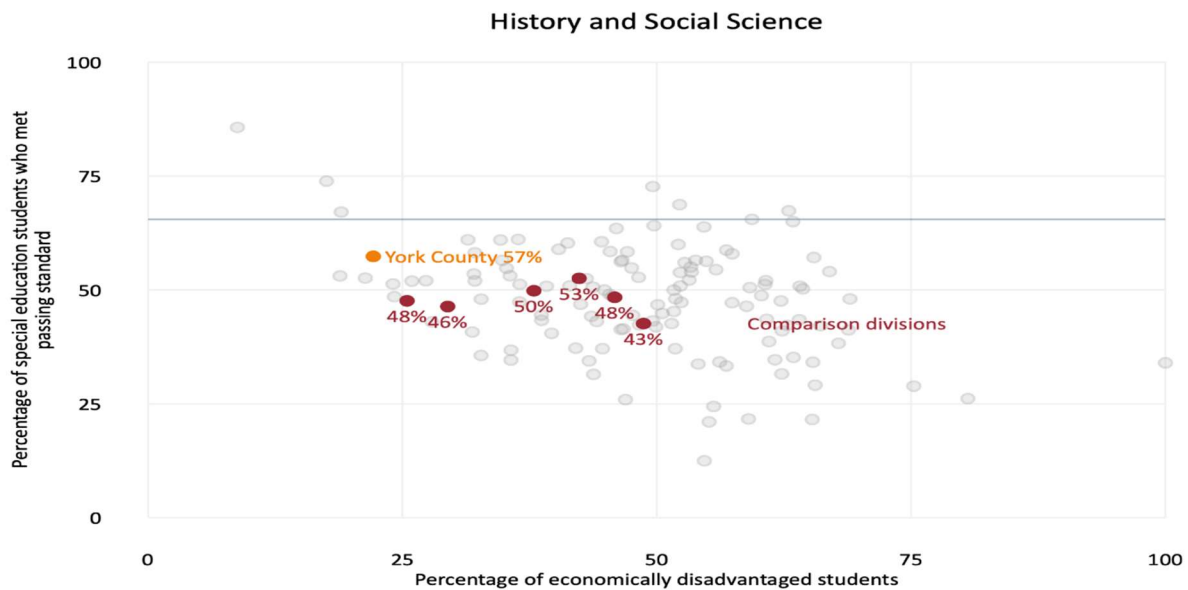

Source. Standardized testing data obtained from the Virginia Department of Education's Build-A-Table online data query tool.

Figure 2.13. Percentage of York County, Peer Division, and Virginia Special Education Students Who Met the Passing Standard on Virginia State History and Social Science Assessments, 2018-19

Source. Standardized testing data obtained from the Virginia Department of Education's Build-A-Table online data query tool.

Figure 2.14. Percentage of York County, Peer Division, and Virginia Special Education Students Who Met the Passing Standard on Virginia State Science Assessments, 2018-19

Source. Standardized testing data obtained from the Virginia Department of Education's Build-A-Table online data query tool.

General Education Performance

Figure 2.15. Percentage of York County, Peer Division, and Virginia General Education Students Who Met the Passing Standard on Virginia State English Writing Assessments, 2018-19

Source. Standardized testing data obtained from the Virginia Department of Education's Build-A-Table online data query tool.

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Figure 2.16. Percentage of York County, Peer Division, and Virginia General Education Students Who Met the Passing Standard on Virginia State History and Social Science Assessments, 2018-19
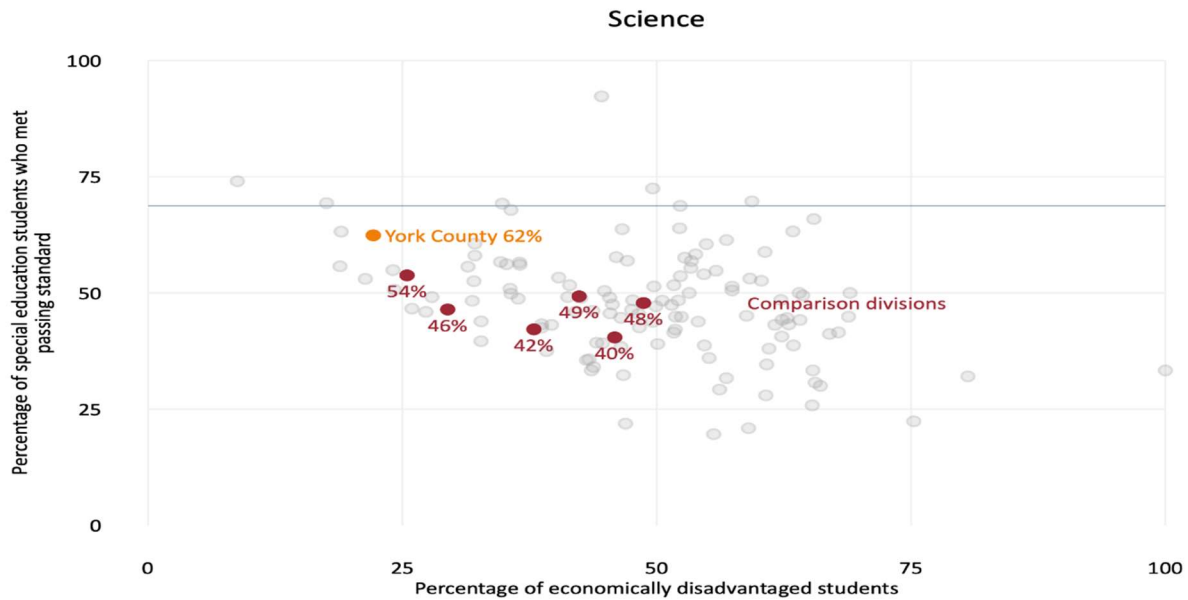

Source. Standardized testing data obtained from the Virginia Department of Education's Build-A-Table online data query tool.
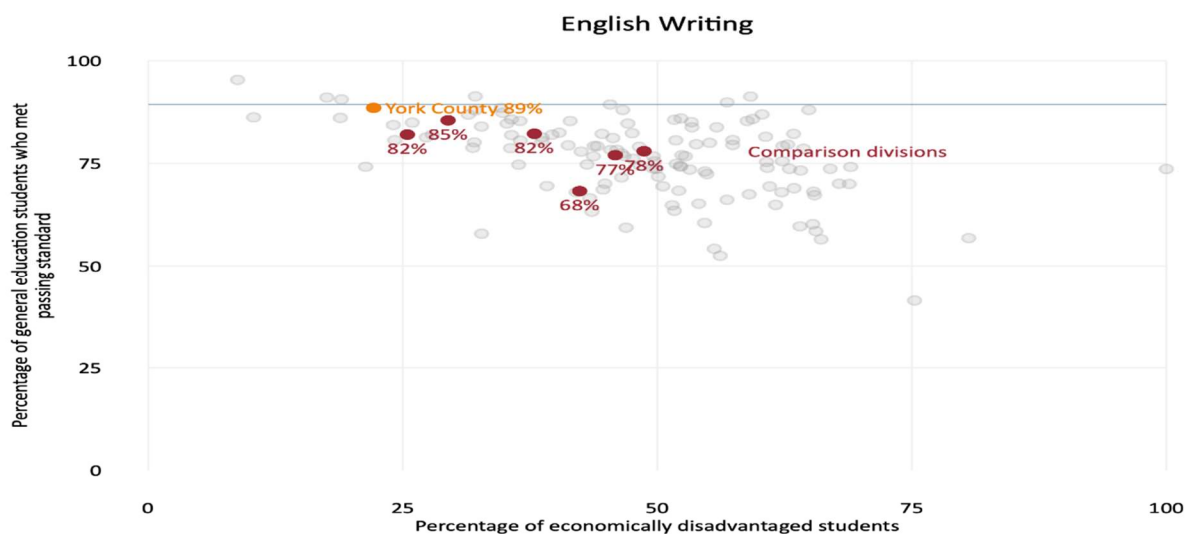
Figure 2.17. Percentage of York County, Peer Division, and Virginia General Education Students Who Met the Passing Standard on Virginia State Science Assessments, 2018-19

Source. Standardized testing data obtained from the Virginia Department of Education's Build-A-Table online data query tool.
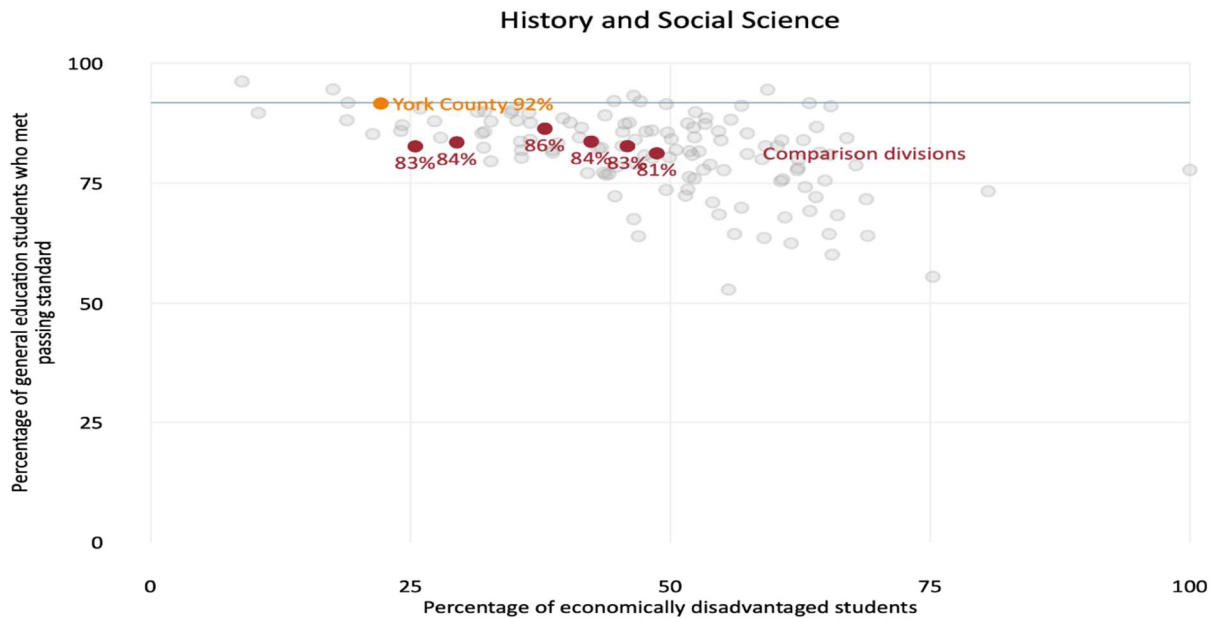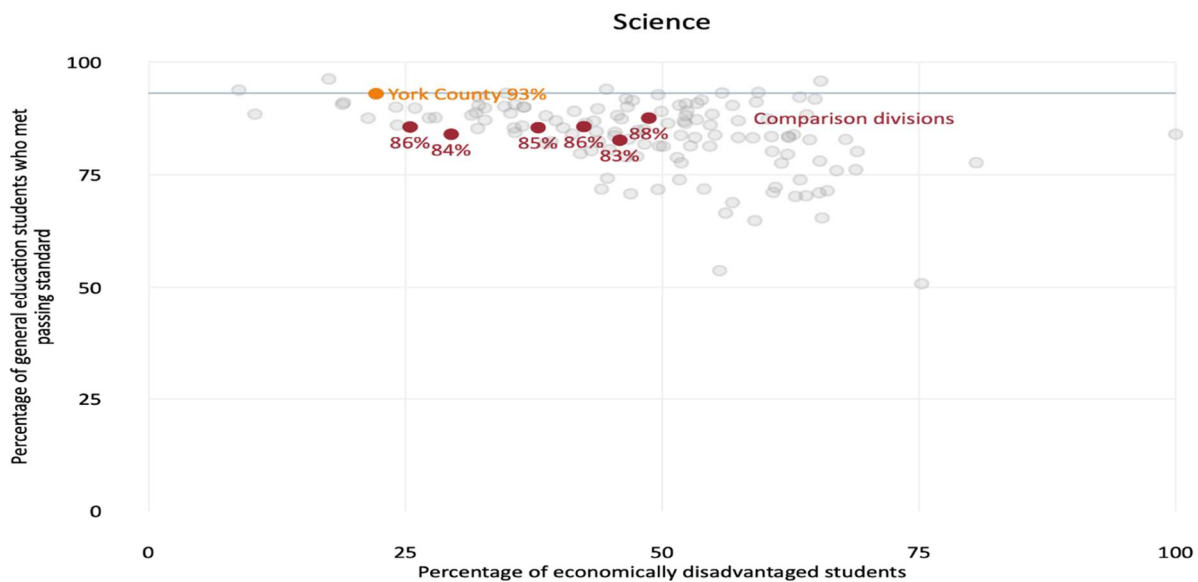
Chapter 3: Program Organization and Management

This chapter provides Gibson Consulting Group's (Gibson's) assessment of the York County School Division's (YCSD) Special Education program organization and management. It addresses the following areas: department organizational structure, staffing, policies and procedures, accountability and compliance management, and financial management. Feedback received from parents and staff through surveys and interviews are also included in this chapter, where appropriate.

This chapter makes several organization and management recommendations to improve the effectiveness and efficiency of the YCSD Office of Student Services (OSS). The current organizational structure of the OSS more closely resembles the organization of a much smaller school system. The Director of Student Services position has an unusually large number of direct reports (22), requiring too much time to be dedicated to the transactional demands normally assigned to supervisory and lower level staff. This, in turn, has reduced the amount of time that can be dedicated to overall departmental management and performance monitoring.

The review team recommends reorganizing the OSS, having fewer direct reports to the director position, and redefining certain positions to improve accountability and focus more on instructional support. Other recommendations in this chapter include: dedicating staff resources to data analysis, data validation and data entry training; developing division staffing formulas and caseloads to supplement the state requirements, and updating operating procedures and job descriptions. There also appears to be an opportunity for YCSD to significantly increase its Medicaid Revenue.

The success of recommended efforts presented in this chapter – some of which are already in process – cannot reasonably be achieved unless the Director position is able to focus on management responsibilities. Gibson believes the best way to accomplish this is through a major reorganization of the department resulting in substantially fewer direct reports to the Director position, and clearer establishment of the functional responsibilities reporting to it.

Organizational Structure

The OSS is led by a Director of Student Services who reports to the Chief Academic Officer (CAO) within the Department of Instruction. The Director of Student Services oversees programs and services designed to meet the academic and behavioral needs of students in the following programs: special education, Section 504 and dyslexia, home instruction (i.e., home-based, homebound, and homeschool), and pre-school. Specific areas of the position's responsibilities include:[1]

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[1] Director of Student Services job description, updated 2015.

- Developing policies and procedures in compliance with federal and state regulations as they relate to special education and Section 504.

- Providing technical assistance to division staff.

- Managing federal and state compliance requirements, including the provisions required for mediation, complaints, and due process hearings.

- Assisting the Directors of Elementary and Secondary Instruction in the preparation of curriculum guides and materials.

- Supervising, coordinating, and evaluating the work of the coordinators and support personnel in organizing and administering student services.

- Assisting in the preparation and management of the student services and VI-B budget.

- Evaluating the needs for special education staff and managing the assignment of staff to buildings based on the number of students in each building and the services required.

- Evaluating student services staffing needs and making recommendations to the CAO.

- Evaluating and identifying interventions to support specialized instruction for students with disabilities.

- Assisting in planning and implementing appropriate staff development activities for student services personnel, teachers and administrators, as appropriate.

The Director of Student Services is supported in these responsibilities by six Coordinators of Student Services (Coordinators) who are generally responsible for:[2]

- Providing support and technical assistance to division staff regarding required procedures and services for students with disabilities.

- Coordinating student services including the responsibility for identification, services, and compliance for students with disabilities within all programs.

- Planning and facilitating professional development programs designed to optimize delivery of specialized instruction for students with disabilities.

- Supporting implementation of division instructional programs to meet the special learning needs of students with disabilities.

- Coordinating the implementation of policies and procedures in compliance with federal and state regulations as they relate to special education and Section 504.

- Supervising the work of support and related services personnel in organizing and administering student services.

- Collaborating with other agencies as necessary.

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[2] Coordinator of Student Services job description, 2015.

The following positions are overseen by the Coordinators of Student Services (depending on the Coordinator's assigned area of responsibility): Job Coach Para-Educators, Itinerant Special Education Para-Educators, Oral Communication Facilitators, and an Interpreter-Transliterator.

Other positions that report to the Director of Student Services based on information corroborated from job descriptions and interviews include the following:

- 1 Behavior Support Specialist: responsible for providing programmatic support and services to schools with the Behavior Support Class (BSC) and the Communication Support Program (CSP) classrooms, as well as other students with emotional disabilities and/or behavioral disorders; this position also provides coaching and professional development to special education teachers related to behavioral interventions and tiered systems of supports.

- 1 Lead OT/PT: responsible for providing occupational therapy services and coordinating the Division's occupational therapy (OT) and physical therapy (PT) services to students with disabilities.

- 1 Lead Speech Language Pathologist (SLP): responsible for providing speech and language therapy services to students with disabilities and coordinating the Division's speech-language services and speech-language pathologist assignments.

- 8 School Psychologists: responsible for providing psychological services to all students in YCSD and to children of residents of York County in other institutions.

- 4 School Social Workers: responsible for providing assessment, counseling, and consultative services that support positive academic and social outcomes for all students.

The organizational structure of the Office of Student Services is shown in Figure 3.1. At the time this review was conducted, the OSS did not have a documented organizational chart. The OSS organizational chart shown in Figure 3.1 was developed by Gibson using position data and information learned during interviews with OSS leadership.

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Figure 3.1. YCSD Office of Student Services Organizational Chart, 2018-19
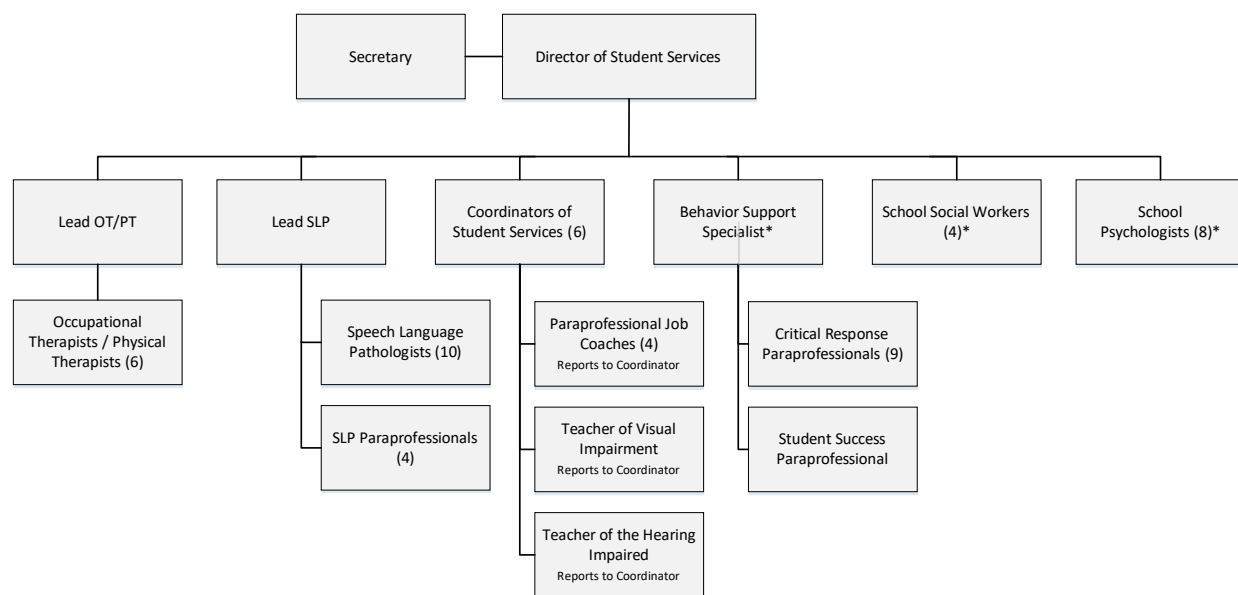
*Provides services and supports to all YCSD students as needed .

Source. YCSD.

Observation 1: The Director of Student Services position has a wide span of control with 22 positions reporting directly to it.

"Span of control" refers to the number of subordinates a supervisor has. Spans of control that are too narrow may indicate staffing inefficiencies, while spans of control that are too wide may prohibit effective oversight and management of program resources. Given that special education is a large program, a heavily regulated program, and has higher risk relative to other programs, a span of control of 20 (excluding a secretary position) is excessive. The implication of having so many direct reports for a program of this size and complexity is that the leadership position is required to be overly involved in transactional level details of student services, sacrificing time needed for management activities.

YCSD peer divisions that had available information showed lower spans of control for the Director position. Gibson conducted a review of special education/student services staffing information of similarly sized school divisions using publicly available information on their websites. Below is a summary of how comparison divisions are centrally organized to support their special education programs. This information should be viewed with caution, however, as Gibson did not investigate the specific roles and responsibilities of these positions. Nevertheless, these reference points seem to indicate that special education program management positions in other similarly-sized school divisions operate with narrower spans of control than YCSD's Director of Student Services.

- Albemarle County Public Schools: 1 Executive Director of Special Education and Student Services; 1 Assistant Director of Special Education; 2 Coordinators of Special Education; 1 Director of Student Services; and 1 Student Services Officer

- Suffolk City Public Schools: 1 Director of Special Education; 3 Supervisors of Instruction for Special Education (self-contained, elementary and secondary)

- Frederick County Public Schools: 1 Director of Special Instructional Services; 1 Assistant Director of Special Instructional Services; 3 Supervisors of Special Instructional Services (ES, MS, HS)

- Fauquier County Public Schools: 1 Director; 3 Supervisors; 1 Office Manager

Observation 2: The current OSS organizational structure does not represent a logical alignment of key functions to support accountability.

The positions currently reporting to the OSS Director reflect specific types of student services or coordinator positions that have broad responsibilities. The following specific student services are direct reports:

- Occupational Therapy / Physical Therapy Lead

- Speech Language Pathologist Lead

- Behavior and Support Specialist

- School Social Workers

- School Psychologists

The remaining positions reporting to the OSS Director are Coordinators of Student Services. According to the job description, these positions are individually responsible for providing technical assistance, service coordination, professional development planning and facilitation, instructional support, and compliance support, among other duties.

In viewing the OSS organization chart, the major functions of the OSS are not visible in position titles, thus limiting the ability of the OSS Director to hold individuals accountable for performance. These functions include:

- Student Identification, Referral and Placement

- Instruction and Learning

- Compliance

- Data Analysis

- Parent Engagement

- Related Services

In addition to a reasonable span of control (discussed above), another basic concept of organizational analysis is a "logical alignment of functions." The current OSS organizational structure and related position titles do not convey functional responsibility. As result, the OSS Director is the only position accountable for OSS functions and related performance.

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Observation 3: The level of oversight and support provided by the Coordinators of Student Services to schools is inconsistent.

One of the most critical functions of the Office of Student Services is to support school-based staff in the delivery of high-quality special education programs and services. The effectiveness and productivity of the Coordinators of Student Services appears to be limited by several important factors, which are described in detail below.

The Coordinator of Student Services position has experienced a high rate of turnover. As described previously, the Student Services Coordinators, in collaboration with the Director of Student Services, are responsible for planning, implementing, and delivering services for students with disabilities. Over the past 5 years, the number of Coordinators increased from 4 full-time equivalents (FTEs) in 2014-15 to 5 FTEs in 2015-16, and subsequently to 6 FTEs in 2017-18. Since 2017-18, YCSD has hired 3 new Coordinators: 1 to fill a newly added position, and 2 to replace staff that left the division. Over the course of this review, one additional Coordinator vacated their position, increasing the overall turnover rate to 50 percent in the past 2 years. Unwanted and high staff turnover can have a negative impact on an organization, including increased recruiting, hiring and training costs, low employee morale due to increased workloads or shifting responsibilities, and lower productivity because new employees may lack requisite experience and/or may not be fully trained. An additional detrimental effect of high turnover in this position is the inability to develop rapport with school staff with whom they need to work very closely to impact student outcomes.

The workload assignments amongst the OSS Coordinators are unbalanced. In addition to the general responsibilities listed on the Coordinator of Student Services position description (listed previously), other responsibilities include attending Individuals with Disabilities Education Improvement Act of 2004 (IDEA) and 504 eligibility meetings, manifestation determination hearings, and providing compliance and technical support to assigned campuses. Other responsibilities divided amongst the individual Coordinators include: monitoring compliance for out of division (OOD) placements, coordinating transition services, Medicaid reporting and billing, and Extended School Year (ESY) services; overseeing the VCU-ACE Technical Assistance Grant; providing Crisis Prevention Institution (CPI) training; overseeing and coordinating pre-school programming; and, participating in teacher application and screening interviews, among other duties. Additionally, each Coordinator is assigned to a group of schools, which ranges between 1 and 4 schools each. Input from staff indicated a concern that the assignment of Coordinator responsibilities and corresponding workloads are unbalanced, and is perhaps a contributing factor to some of the turnover within the OSS.

Coordinators spend a significant percentage of their time facilitating special education and Section 504 eligibility meetings, a function often managed by school administrators in other school divisions. Once a child's full initial evaluation (FIE) is complete, an eligibility meeting is held to determine whether the child qualifies for special education and related services (a similar process is followed for Section 504 eligibilities). The Regulations Governing Special Education Programs for Children with Disabilities in

Virginia[3] specifies that the composition of the eligibility group may be the IEP team (8VAC2081-110), and shall include, but not be limited to:

- Local educational agency personnel representing the disciplines providing assessments;

- The special education administrator or designee;

- The parent(s);

- A special education teacher;

- The child's general education teacher or if the child does not have a general education teacher, a general education teacher qualified to teach a child of the child's age; or for a child of less than school age, an individual qualified to teach a child of the child's age; and,

- At least one person qualified to conduct individual diagnostic examinations of children, such as school psychologist, speech-language pathologist, or remedial reading teacher.

Although Coordinators are not required (by law) to attend eligibility meetings, they report that they spend a significant percentage of their time doing so. Special education eligibility meetings are scheduled monthly at each school (e.g., eligibility meetings at Dare Elementary are conducted on the first Wednesday of each month). YCSD staff estimates that more than 600 special education and 504 eligibility meetings were conducted last year, and some Coordinators estimate that they spend up to 30 percent of their time attending these meetings. While there may be instances that require their attendance, the general obligation to attend these meetings means that Coordinators are unable to dedicate time to other essential responsibilities, such as monitoring compliance and providing instructional support to administrators and teachers.

By Fall 2019, coordinators were phasing out of participating in reevaluation meetings and spending more appropriate time supporting school administrators and special education teachers.

Coordinators do not receive sufficient training or on-going professional development related to their assigned areas of responsibility. YCSD does not have a formalized training program for the Coordinators of Student Services (apart from the new employee orientation activities sponsored by the Human Resources Department). Coordinators are each assigned a mentor within the OSS (typically another Coordinator) who arranges experiences for the new hire (e.g., attend a Manifestation Determination Review (MDR)) and assigns other staff to assist with this training. Coordinators, particularly those new to YCSD, report that they have received very little formalized training related to their assigned areas of responsibility and expressed a desire for more training on division policies and standard operating procedures. This has resulted in the inconsistent implementation of the Division's policies and standard operating procedures, which is discussed in more detail in later sections of this report.

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[3] Virginia Administrative Code 8VAC2081-110.

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Recommendation 1: Reorganize the Office of Student Services to achieve a reasonable span of control and a logical alignment of functions.

YCSD should reorganize the OSS to reduce the span of control of the Director position, and to ensure that there is a clear delineation of responsibility and accountability for key functions: student identification, program compliance, data analysis and reporting, instruction and learning, and related services. Specific implementation considerations are presented below:

- Before developing job titles, YCSD should decide on what key functions should report to the Director position. All OSS staff positions should report up through one of those functions. The review team lists suggested functions above; however, YCSD needs to define these.

- Supervisory titles can be determined once the degree of responsibility is established. The factors that would dictate a higher supervisory title (Assistant Director) over a lower title (Coordinator or Supervisor) include the number of total positions under the supervisory position, budget responsibility, and degree of risk associated with the function. Job titles should include a functional reference to support accountability. YCSD budget constraints may limit the number and/or level of supervisory positions; some supervisory positions/functions may need to be combined. However, other than the Secretary, only supervisory positions should report to the OSS Director.

- Generic job titles (e.g., Coordinator of Student Services) should be converted to functional/program specialist positions to reflect expertise and focus.

- Based on the job assignments, an OSS organizational chart should be developed and finalized by YCSD.

- Job descriptions for new or changed positions will need to be developed, and reviewed and updated annually.

- Measureable performance goals should be established for each supervisory position. Actual performance against goals should be incorporated into supervisory performance evaluations.

- A migration plan should be developed to support an effective transition from the current organizational structure to the new one. If new positions are created, then existing OSS staff should be able to apply for the positions.

The resulting organizational structure will help distribute accountability to supervisory levels, allowing the OSS Director to manage functions and not staff positions.

Other related implementation considerations include the following:

- Consider eliminating the practice of OSS staff participating in IEP meetings for compliance purposes. The position responsible for compliance should be responsible for training campus-based administrators on monitoring compliance. OSS instructional or other specialists may be needed for specific IEP meetings based on student needs.

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- Consider increasing the number of Assessment, Accountability, and Intervention (ACI) Coordinators at elementary schools to relieve Assistant Principals of their responsibilities related to facilitating special education and Section 504 eligibility meetings, state and national testing program. School Principals or other designated school administrators should serve as the LEA administrative representative at all eligibility meetings. (See related Recommendation 6 later in this chapter).
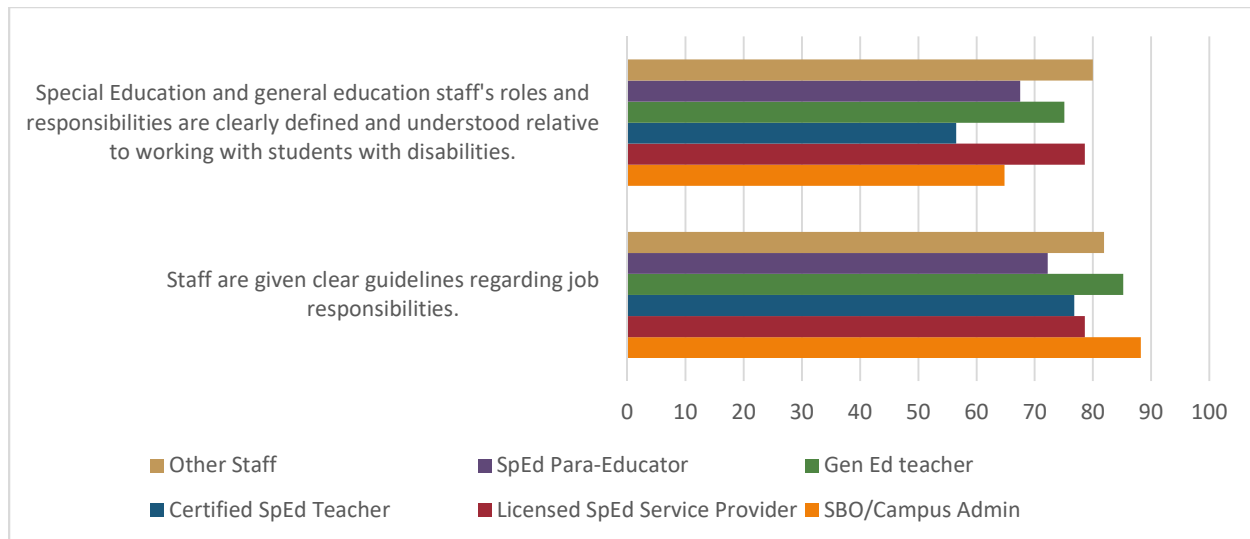
Observation 4: Job descriptions do not exist for all positions and many are outdated.

A job description outlines the basic duties performed by someone in a given position, along with expected performance metrics. Job descriptions are used by managers in the hiring process, and also serve as a point of reference by employees and their managers during the performance evaluation process. YCSD's job descriptions are available on the school division's website.[4] Gibson's review of 44 job descriptions for instructional/special education positions found that:

- *Job descriptions do not exist for all positions.* Specifically, Gibson was unable to locate job descriptions for the following positions: Lead OT/PT, Special Education Lead Teacher, Job Coach Para-Educator, and the Student Success Para-Educator.

- *Many job descriptions have not been revised in more than 10 years and, in some cases, responsibilities on the job description do not reflect the actual responsibilities performed* (e.g., Physical Therapist in 1995, Special Education Teacher in 1999, Assistant Principal in 2005, Critical Response Para-educator in 2008, CAO in 2010, Special Education Para-educator in 2010, Behavior Support Specialist in 2012). There are also examples where the responsibilities outlined in the job description do not reflect the actual responsibilities performed (e.g., Behavior Support Specialist).

- *Many job descriptions list multiple supervisors and/or supervisor titles that are inaccurate/outdated* (e.g., Critical Response Para-educators report to Instructional Specialist and Principal). This can create confusion around reporting and accountability structures, particularly for newly hired employees.

In the staff survey, 81.5 percent of staff surveyed agreed that they are given clear guidelines regarding job responsibilities, and 71.5 percent agreed that special education and general education staff's roles and responsibilities are clearly defined. Further analysis shows that agreement rates varied by employee group, with special education para-educators and special education teachers having the lowest rates of agreement (see Figure 3.2). This data indicates the need for additional job clarification.

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[4] YCSD website: https://yorkcountyschools.org/employees/employment/jobDescriptions/default.asp.

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Figure 3.2. Staff Survey Responses – Job Responsibilities

Source. Gibson Staff Survey (Q27_10, Q21_10).

The lack of current and complete job descriptions can pose several issues, including possible exposure to legal risks. For example, without clearly stated duties and performance standards, YCSD increases the chance of hiring someone without the necessary skills, experiences, and personal qualities for the job. Without a complete job description, it also becomes very difficult for an employee to know what is expected of him/her and for a manager to provide an accurate and effective appraisal. Job descriptions also offer insight into areas in which employee skills need upgrading, and without complete job descriptions, it is difficult to develop training requirements.

Recommendation 2: Review and update all job descriptions to ensure that they accurately reflect assigned roles, responsibilities, reporting relationships, and position qualifications.

Updated job descriptions are essential for ensuring that both supervisors and staff understand the essential knowledge, skills, abilities, responsibilities, and reporting relationships for their position. It is also necessary for recruiting and hiring, conducting performance evaluations, determining Americans with Disabilities Act (ADA) accommodations, and mitigating employee complaints related to compensation or Equal Employment Opportunity Commission (EEOC) charges, among other things. YCSD should establish a plan to review and revise job descriptions (for all departments, including OSS) every three years, or more often and as needed when job responsibilities or working conditions change.

Position descriptions will also need to be updated to reflect new roles and responsibilities and reporting structures (recommended above), and all staff should receive on-going professional development to ensure that they have the knowledge and skills to carry out their assigned areas of responsibility.

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Program Staffing

Student Services and special education staffing includes 263.2 FTE centrally-reported and school-based positions, detailed in Table 3.1.

Table 3.1. YCSD Office of Student Services FTEs, 2018-19

Position Type	Total FTEs
Centrally-Reported Positions	*67.6*
Speech Language Pathologist	10
School Psychologist*	8
Critical Response Para-Educator	9
Coordinator	6
Job Coach Para-Educator	6
Occupational Therapist	5
Speech Language Para-Educator	5
Itinerant Special Education Para-Educator	4
School Social Worker*	4
Oral Communication Facilitator	4
Physical Therapist	1.6
Behavior Support Specialist	1
Interpreter-Transliterator	1
Student Success Para-Educator*	1
Secretary	1
Director	1
School-Reported Positions	*198.6*
SPED Teacher	102.6
SPED Para-Educator	96
Total FTEs	**263.2**

Source. YCSD.

*Social Workers, School Psychologists, and the Student Success Para-Educator provide services and support to both general education and special education students.

Overall, total program staff relative to the number of students with disabilities decreased from 2014-15 to 2018-19 (increasing student-staff ratio), but has remained constant since 2016-17 (Table 3.2).

Table 3.2. YCSD Student Services FTE, 2013-14 to 2018-19

	2014-15	2015-16	2016-17	2017-18	2018-19
SPED Students	1,300	1,337	1,415	1,456	1,513
Total Program FTEs	237.3	247.2	246.2	254.7	263.2
Student-Staff Ratio	**5.5**	**5.4**	**5.7**	**5.7**	**5.7**

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Source. YCSD (StaffDataElements_5Years_MOY.xls).

*Note: This analysis includes all Placement Codes and excludes students with an Active Status Code of N.

Teachers and Para-educators

As part of this review, Gibson assessed the overall sufficiency of YCSD's teacher and para-educator staffing levels by examining the student-staff ratios for teachers and para-educators. Table 3.3 shows the special education student-teacher ratio by school level for the past 5 years. Overall, the ratio has increased slightly (indicating more students per teacher) and ratios are highest at high schools. Publicly available data for comparison school divisions are unavailable.

Table 3.3. Special Education Student-Teacher Ratio, 2014-15 to 2018-19

School Level	2014-15	2015-16	2016-17	2017-18	2018-19
Special Education Teachers					
Elementary	42.1	46.0	47.0	47.0	48.0
Middle	25.0	25.0	27.0	26.0	26.0
High	26.1	29.1	26.6	28.6	28.6
Total Teachers	**93.2**	**100.1**	**100.6**	**101.6**	**102.6**
Special Education Students*					
Elementary	457	499	501	508	541
Middle	296	282	310	309	324
High	332	347	355	385	383
Total Students	**1085**	**1128**	**1166**	**1202**	**1248**
Special Education Student-Teacher Ratio					
Elementary	10.9	10.8	10.7	10.8	11.3
Middle	11.8	11.3	11.5	11.9	12.5
High	12.7	11.9	13.3	13.5	13.4
Ratio	**11.7**	**11.3**	**11.6**	**11.8**	**12.2**

Source. YCSD (StaffDataElements_5Years_MOY.xls).

*Note this analysis excludes all students with placement setting of: Private Day School, Private Residential School, Public Separate Day School, and Service Provider. It also excludes students with SLI as a primary disability since they mostly receive their services from an SLP, and it excludes students with an Active Status Code of N.

Observation 5: Average teacher caseloads vary widely across campuses and some campuses are well-below the State's caseload maximum.

Virginia Statutes[5] specify staffing patterns for special education services for school age children ages 5 to 21. These regulations state, among other things, that students with disabilities shall be instructed with

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[5] Virginia Administrative Code 8VAC20-81-40.

students without disabilities in general education settings and classrooms, as appropriate, and in accordance with their IEP, and further specify the maximum instructional caseloads for special education teachers and SLPs for which public schools receive state funds. A building teacher caseload average is computed by dividing the total weights for all children receiving Level I and Level II services by the number of special education teachers providing services. The service level, Level I or II, is determined by the percent of time the student receives special education, with Level II indicating a higher level of service. *Virginia Regulations* state that the building average caseload shall not exceed 20 points if services are provided to students receiving Level I and Level II services, and the building average caseload shall not exceed 24 points if services are provided only to children receiving Level I services.

The methodology used by the Director of Student Services to determine special education teacher and para-educator staffing allocations (for inclusion) is consistent with the staffing requirements set for by the *Virginia Regulations*. The process begins with an extract of all active students from the Virginia IEP system. To plan for the following year, students are "promoted" to the next grade level and feeder campus. It is important to note that students who receive speech-only services or are in self-contained settings are excluded from this process. Using the "percent of time the student receives special education" (which is stored as a field in the State database, but is ultimately derived from student IEPs), students are assigned a weight of either a 1, 2, 2.5 or 3.3. Students who receive special education less than 50 percent of the time are determined to be Level I. Students who receive special education more than 50 percent of the time are assigned a weight of 2 or 2.5 (depending on the individual needs of that child). Students who receive special education more than 50 percent and have a primary disability of Autism are assigned a weight of 3.3. All students with a percent of time greater than 50 percent are determined to be Level II. Para-educators are allocated to campuses based on the number of Level II students. Points for each campus are then aggregated to determine the projected number of teachers and para-educators that will be needed the following school year. As enrollment projections firm up, staffing levels are adjusted accordingly. It should be noted that this staffing allocation process does not account for any differences across campuses in service delivery models (e.g., co-teach); it is up to each campus to determine how to assign special education teachers and pare-educators to classrooms.

Table 3.4 shows the Fiscal Year (FY) 19 average special education teacher caseloads by campus calculated by the OSS and used to project the Division's future special education teacher staffing needs. Average special education teacher caseloads are lowest at the elementary school level (ranging from 15.3 to 20.0). There is less variation at the middle school level, which ranges from 17.4 to 19.2; the average teacher caseloads at the high school level ranges from 16.0 to 21.1. Most of these caseloads are below the state maximums; however, it is possible that GHS (21.1) is above the state maximum (20) since it includes Level II students as part of the Multiple Disabilities Program (MDP).

Table 3.4. FY19 Special Education Teacher Average Caseload by School*

Elementary School	Average Elementary School Caseload	Secondary School	Average Secondary School Caseload
BMES	15.9	GMS	17.9
CES	16.4	TMS	17.4

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Elementary School	Average Elementary School Caseload		Secondary School	Average Secondary School Caseload
DES	17.7		QLMS	19.0
GBES	20.0		YMS	19.2
MES	15.3		MS Average	18.4
MVES	17.5		BHS	16.6
SES	13.6		GHS	21.1
TES	15.4		THS	19.0
WMES	17.4		YHS	16.0
YES	18.0		YRA	17.5
ES Average	16.7		HS Average	18.0

Source. YCSD DR#9.

*Average caseloads represent the FY19 New Caseload Average (with projected FTE changes).

The process for allocating special education teacher positions to campuses is driven by the individual needs of students (i.e., the percent of time the student receives special education services) as documented in their IEPs. The challenge, however, is that the IEP committee decisions that ultimately drive staffing levels are strongly influenced by a variety of school-based factors, including the philosophy of administrators and teachers regarding their shared ownership and responsibility for the success of *all* students, the degree of collaboration between general education and special education teachers, and classroom practices that support diverse learners. The low and varying average teacher caseloads across schools, coupled with the fact that YCSD is not meeting state targets with respect to Indicators 5A and 5B (school-age least restrictive environment), suggests that there may be opportunities to improve staffing efficiency.

Recommendation 3: Improve school-level staffing efficiency by providing more guidance and support to IEP teams.

Determining optimal staffing levels for special education teachers and para-educators is challenging for SBO administrators because the instructional arrangement and level of support required for each student are determined on an individual basis through the IEP team. To improve staffing efficiency, the OSS will need to provide more guidance to IEP teams as they determine a student's least restrictive environment (LRE) and the level of special education services required. One way to do this is to implement the practice of conducting "staffings" (i.e., pre-IEP meeting to discuss student data and needs; no decisions are made in "staffing" meetings), which is a common practice to help school staff prepare for the IEP meeting. Further, the SBO should provide more support to schools when developing their master schedules and special education teacher schedules to ensure that staff are utilized most effectively. This topic is discussed further in *Chapter 4 – Program Implementation*.

Observation 6: YCSD relies heavily on the use of para-educators to support students with disabilities.

Para-educators are frequently used to help support students with disabilities in inclusion, resource, and self-contained settings. In YCSD, there are four types of para-educator positions that provide instructional and/or behavioral support to students with disabilities:

- *Special Education Para-Educators* – Assists the special education and/or classroom teacher by performing assigned duties related to the learning process as outlined in students' educational plans such as assembling and preparing instructional materials and reinforcing instruction under the direction/supervision of the teacher or building administrator.[6] These para-educators provide support in both inclusion and self-contained classrooms.

- *Itinerant Special Education Para-Educators* – Substitutes for classroom teachers who need to attend meetings related to the education of students with disabilities. These para-educators report centrally to one of the Coordinators of Student Services.

- *Critical Response Para-Educators* – Assists the classroom teacher and other school building staff by performing assigned duties related to the learning process as outlined in student's educational plans and behavior plans such as reinforcing instruction under the direction/supervision of the teacher or building administrator.[7] Critical Response Para-Educators report centrally to the Behavior Support Specialist and are assigned to support individual students for up to 8 weeks.

- *Job Coach Para-Educators* – Assists with the Project Search and Project Experience transition programs providing assistance and transporting students to/from job sites.[8] These positions report centrally to the Coordinator assigned to oversee the division's transition programs.

The reliance on para-educators is not an uncommon practice in many school divisions, as para-educators typically cost about one-half that of a certified teacher. In fact, 86.5 percent of special education teachers and 81.1 percent of non-special education teachers that responded to Gibson's staff survey agreed with the statement *"I am satisfied with the amount of support I receive from my classroom assistant"*. However, much of the research suggests that para-educators have little, if any, positive impact on improving outcomes for students with disabilities.[9] In fact, there are significant concerns, based on research, that current use of para-educators can decrease a student's access to certified teachers as well as the student's level of engagement in the classroom. The use of a para-educator also can decrease the general education teacher's level of engagement with the student when mainstreamed.[10] For these reasons, the special education student-para-educator ratio and the teacher-para-educator ratio are important metrics to consider when evaluating program staffing.

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[6] SPED Para-Educator job description, revised 2010.
[7] Critical Response Para-Educator job description, 2008.
[8] A position description does not exist for the Job Coach Para-Educator.
[9] http://journals.sagepub.com/doi/abs/10.3102/01623737023002123
[10] *The Who, What and How of Paraprofessionals: Using These Instructional Supports Effectively*, Katie Bass, Autism Society.

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The number of para-educators relative to the number of special education students has fluctuated at YCSD over the past five years (Table 3.5).

Table 3.5. Special Education Student-Para-Educator Ratio, 2014-15 to 2018-19

	2014-15	2015-16	2016-17	2017-18	2018-19
Special Education Students*	1,086	1,128	1,166	1,202	1,248
Para-Educators	106.5	107.5	104.0	110.0	114.0
Student-Para Ratio	**10.2**	**10.5**	**11.2**	**10.9**	**10.9**

Source. YCSD (StaffDataElements_5Years_MOY.xls).

*Note: This analysis excludes all students with placement setting of: Private Day School, Private Residential School, and Public Separate Day School, and it excludes students with a Primary Disability of SLI.

YCSD currently has an overall special education teacher-para-educator ratio of 0.9, indicating that there are 10 percent more special education para-educators than teachers overall, shown in Table 3.6. Having the total special education instructional staff more heavily weighted toward para-educators than certified teachers is not best practice.

Table 3.6. Special Education Teacher-Para-Educator Ratio, 2014-15 to 2018-19

Position	2014-15	2015-16	2016-17	2017-18	2018-19
Special Education Teachers	93.2	100.1	100.6	101.6	102.6
Para-Educators	106.5	107.5	104.0	110.0	114.0
Teacher-Para Ratio	**0.88**	**0.93**	**0.97**	**0.92**	**0.90**

Source. YCSD (StaffDataElements_5Years.xlxs).

Recommendation 4: Convert some para-educator positions to teacher positions to more significantly impact student learning.

YCSD should reduce its heavy reliance on para-educators in the general education classroom. The Division should also ensure that both general and special education teachers are adequately prepared to supervise the para-educators in their classrooms. Specific strategies that could be pursued include:

- Ensure that all student IEPs are reflective of the actual services that students need as the services in student IEPs ultimately drive the level of staff required to provide those services. To this end, YCSD should expand the practice of conducting "staffings" prior to the IEP Team meetings (as discussed previously), particularly at schools that have a demonstrated pattern of including 100 percent para-educator support in student IEPs.

- Ensure that student IEPs include a plan to fade the level of para-educator support for students over time, when appropriate.

- Provide digital content for the general education classrooms that allows for differentiation of instruction for students with disabilities (e.g., subject matter content written at the students' Lexile reading level, writing frameworks, and math scaffolded practice).

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Related Services Providers

Under the IDEA, related services are the array of supportive services provided to students with disabilities to assist him/her in benefitting from special education.[11] Related services include, but are not limited to, speech-language pathology, audiology services, interpreting services, psychological services, physical and occupational therapy services, counseling services, orientation and mobility services, school health services, social work services, parent counseling and training, and transportation.

Observation 7: The Office of Student Services has not established caseload maximums for some related services providers and, in some cases, student-staff ratios far exceed recommended industry standards.

Below, a trend analysis of overall staffing ratios (and average caseloads, where data are available) is provided for related service providers. The review team's analysis found that over the past 5 years staffing ratios increased for SLPs (slightly), OTs, and decreased for School Psychologists and Social Workers.[12]

- *Speech Language Pathologists* – In 2018-19, the average number of students with disabilities per SLP (excluding SLP Para-Educators) was 150.2, which is an increase of 5 percent from 143 in 2014-15. The *VA Regulations* (8VAC20-81-340) establishes the maximum caseload standards for speech language pathologists at 68. Caseload data provided by the OSS shows that the average SLP caseload (March 2019) was 64.5, with a minimum caseload of 57 and a maximum caseload of 83. Three of the 10 SLPs had caseloads that exceeded the state's maximum.

- *Occupational Therapists* – In 2018-19, the average occupational therapist caseload was 78.4 (392 students served / 5 FTE staff), up from 70.0 (350 students served / 5 FTE staff) in 2015-16, and higher than the target ranges (30-60, depending on age/grade and service level) established by other states. The Virginia Standards of Quality do not establish staff ratios or caseloads for occupational therapists.

- *School Psychologists* – School psychologists provide a broad range of professional services to support the academic achievement, positive behavior, and social-emotional wellness of all students. In 2018-19, the average number of students with disabilities per psychologist was 214.6, an increase of 16.7 percent from 183.9 in 2014-15. It is important to point out that Psychologists provide services for all students in the Division, not just students with disabilities. With this in mind, the total student-staff ratio for Psychologists in 2018-19 was 1,853. The National Association of School Psychologists (NASP) recommends a maximum ratio of 1,000 students per LSSP/Diagnostician for the general population of students.[13]

- *Social Workers* – In 2018-19, the average number of students with disabilities per social worker was 375.5, a decrease of 12.5 percent from 429 in 2014-15. Similar to psychologists, social workers provide services to all students and families in the Division. In 2018-19 the total student-staff ratio for this position was 3,243. The National Association of Social Workers (NASW)

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[11] IDEA 34 CFR 300 34.
[12] Student counts exclude students in Private Day and Private Residential settings.
[13] https://www.nasponline.org/

recommends a ratio of one school social worker per 250 general education students, or a lower ratio of one school social worker per 150 if also providing services to students with intensive needs.[14]

The *Regulations Governing Special Education Programs for Children with Disabilities in Virginia* specifies a maximum caseload for speech language pathologists but not for other related services providers. YCSD has not established caseload maximums for other related services providers, making it difficult to assess staff's capacity to provide related services to students in accordance with their IEPs. Of note, the OSS reported to the review team that the Division has not had to provide any compensatory services to students, although most focus group participants reported feeling stretched about meeting required timelines, and others felt that workloads amongst some of the positions are unbalanced.

Recommendation 5: Establish targets for related services provider student-staff ratios and caseload maximums to ensure optimal staffing efficiency and effectiveness.

Determining the appropriate caseloads of evaluation staff and other related service providers should consider such factors as the intensity of direct and indirect services provided (in terms of IEP minutes), number of schools served and their geographic proximity, and the number of IEP meetings, screenings and evaluations, among other things. It is also important to remember that caseloads for all related services providers fluctuate over the course of a year due to eligibility determinations and changes to student IEPs. For these reasons, it is difficult to set a standard on what a recommended average caseload should be for these types of positions.

By establishing targets for student-staff ratios and caseload maximums for each of the related services provider positions, the OSS can more effectively assess whether staffing for these positions are at a level that is sufficient to address the nature and extent of student needs with reasonable workload expectations. Comparing staffing ratios and caseloads over time and to other school divisions can serve as an important indicator of the sufficiency of YCSD's overall staffing levels. The OSS should monitor and track staffing ratios bi-annually and use this information to justify budget requests (or not). Further, service provider caseloads should be monitored monthly so workload assignments can be effectively managed.

The OSS should coordinate the development and refinement of targets for student-staff ratios with Finance and Human Resources as part of the Division's annual budgeting process.

School-based Support

In addition to teachers, para-educators and related services providers, there are several other positions that are responsible for the implementation of YCSD's special education program and services at the school level, namely the Assistant Principals, Special Education Lead Teachers, and the Assessment, Compliance and Intervention (ACI) Coordinators.

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[14] NASW Standards for School Social Workers at https://www.socialworkers.org.

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Observation 8: Responsibility for the coordination and oversight of YCSD's special education program is not clearly and consistently delineated across applicable campus positions.

During interviews and focus group sessions, the review team received consistent feedback from staff that the roles and responsibilities for these positions varied significantly both across and within school levels, creating unbalanced workloads and contributing to an inconsistent application of the Division's policies and standard operating procedures. Further, a review of job descriptions for these positions found that none of them articulated any specific responsibility related to special education (see Observation X). Below is a brief description of the responsibilities for these positions at each school level:

- *Elementary Schools* – All elementary campuses are allocated 1 FTE Assistant Principal, with the exception of Magruder and Yorktown, who are each allocated 2 FTE Assistant Principal positions. Assistant Principals at elementary schools are responsible for overseeing all IEP and 504 meetings, the LEP/bilingual programs, and the state and national testing programs, among other responsibilities. The review team heard consistent feedback at all levels in the organization that elementary school Assistant Principals were "overwhelmed and stretched" with respect to the oversight and management of special education programs and services on their campuses. Grafton Bethel and Mount Vernon each have 1 FTE ACI Coordinator position who is responsible for coordinating and monitoring the school's Tiered System of Support (TSS)/Response to Intervention (RtI) program, the division-wide testing program, and processes and requirements related to eligibility and implementation of 504 plans. Special Education Lead Teachers at elementary schools teach a full load and do not receive a stipend.

- *Secondary Schools* – All secondary schools are allocated 2 FTE Assistant Principal positions, and typically one of the two Assistant Principals has responsibility for coordinating the school's special education program and processes. All secondary schools are allocated 1 FTE Assessment and Compliance Coordinator (ACC) who have all of the same responsibilities as the ACI in addition to managing and coordinating truancy and discipline related to school and class attendance. Special Education Lead Teachers at middle schools are considered a department chair and teach less than a full load, and at high schools they do not teach any classes, are responsible for all special education compliance/paperwork, and manage RTI processes (discussed further in *Chapter 4 – Program Implementation*).

Recommendation 6: Ensure that school-based administrators and staff have the capacity to support the effective implementation of special education programs and services.

Each elementary school needs some level of ACI support to monitor eligibility processes including pre-referral interventions, 504 plan development and monitoring, and to support the work of special educators. The level of support needed may vary from school to school but each school should be provided with no less than 1 half-time ACI. Providing this additional support for schools that do not currently have ACI support will relieve Assistant Principals and allow them to perform their other administrative duties.

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Further, Special Education Lead Teachers at every level need time free from teaching responsibilities to support, mentor, or coach other special education teachers. They can support quality IEP development, progress monitoring, use of quality instructional strategies, social skills instruction, and other practices that will improve outcomes for students with disabilities. Full-time Lead Special Education teachers at all schools with no teaching responsibilities should be able to support teachers more fully and could help to relieve the load carried by Coordinators at eligibility meetings.

The OSS must also ensure that all campus-based administrators and staff receive on-going professional learning related to the implementation of programs and services for students with disabilities.

Employee Job Satisfaction

It is important to measure employee job satisfaction because a person's attitude or beliefs may affect his or her behavior and has been linked to many variables such as productivity, absenteeism, and turnover.[15] Overall, staff in YCSD have a high level of satisfaction with their job (87.3%) and would be willing to recommend their school or office as a good place to work (88.1%). Eighty-five percent of staff are confident that they will still be working in YCSD in two years and are willing to spend the rest of their career working for the school division. When asked about their own performance, 98.9 percent of staff are proud of the work that they do and 95.7 percent of staff are satisfied with their own performance. Despite this overall high level of job satisfaction, 71.2 percent of staff report that they have an extremely large amount of work to do at any given time, and 61.7 percent report feeling stressed at work.

When survey responses were analyzed by the different employee groups, the review team found varying levels of satisfaction on some of the indicators (Figure 3.3).

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[15] https://iedunote.com/importance-job-satisfaction

Figure 3.3. Staff Survey Responses – Job Satisfaction (Positive Indicators)
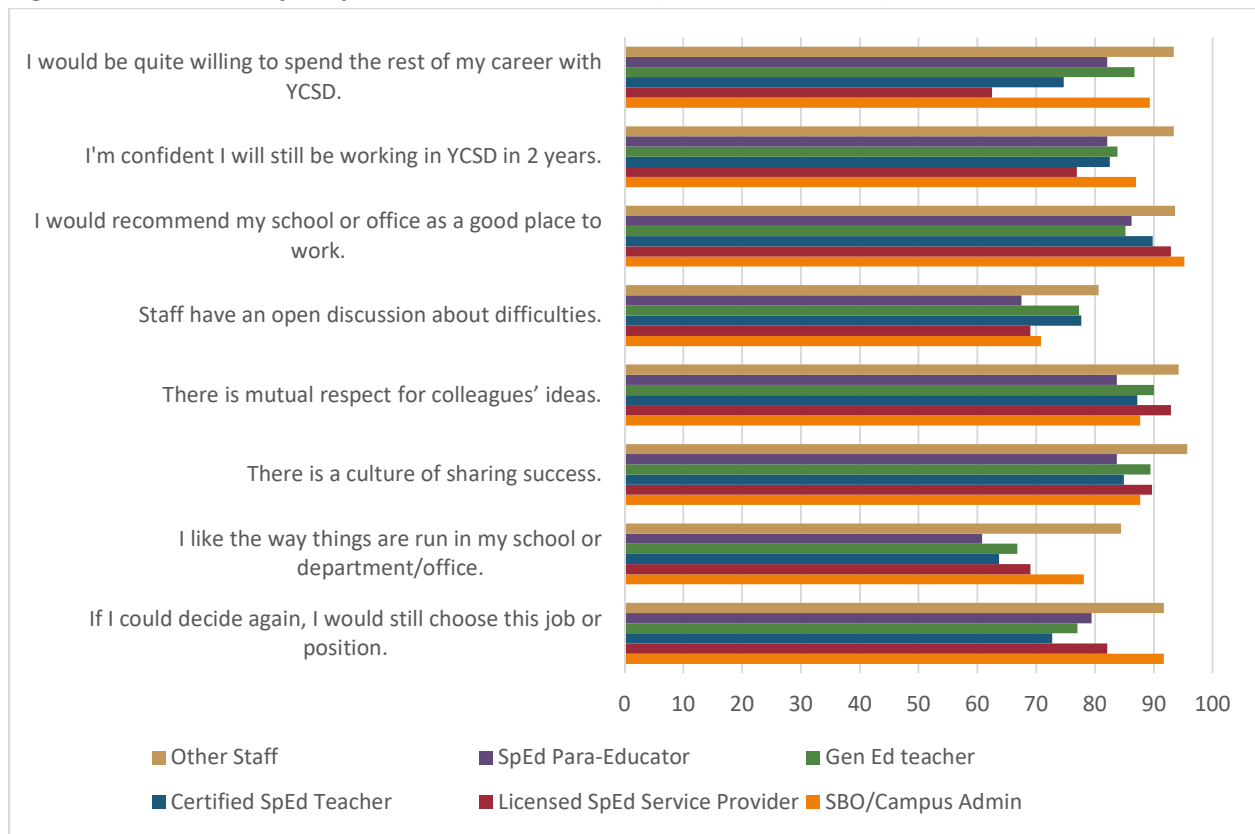
Source. Gibson Staff Survey.

On the negative indicators of job satisfaction, special education teachers had some of the highest rates of agreement (relative to the other employee groups), shown in Figure 3.4 below.

Figure 3.4. Staff Survey Responses – Job Satisfaction (Negative Indicators)
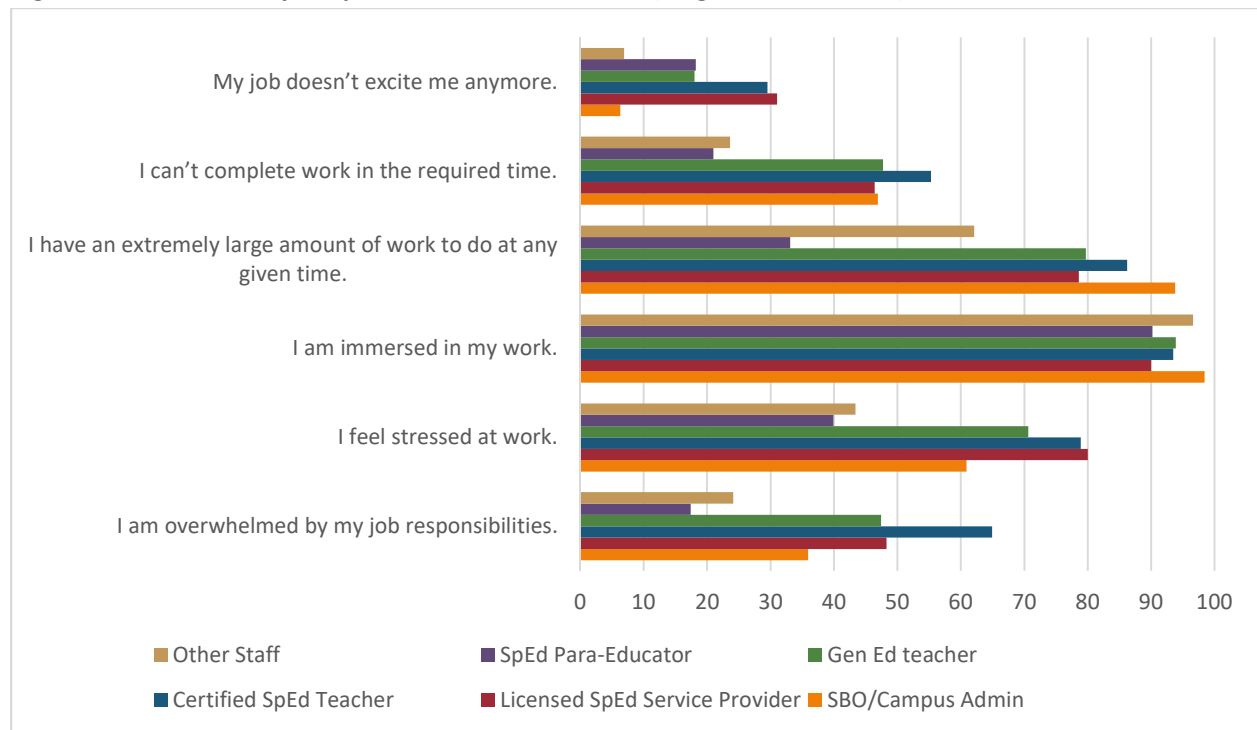
Source. Gibson Staff Survey (Q23_5, Q23_8, Q23_16, Q23_20, Q23_21, Q23_6).

The review team also analyzed job satisfaction indicators by school level and found that there was some variation both across and within school levels. Overall, job satisfaction was highest at high schools (91.6%) and lowest at other/non-traditional schools (62.5%); both elementary and middle schools had roughly 86 percent of staff indicate that they are satisfied with their job. At the elementary level, which had the widest variation, job satisfaction ranged from a high of 96.9 percent at Waller Elementary to a low of 76.9 percent at Yorktown Elementary.

Policies and Procedures

To receive federal funds available under the IDEA, local school boards must adopt and implement special education policies and procedures consistent with federal and state regulations to ensure a free appropriate public education (FAPE) to all students who are eligible for special education. As part of this special education review, Gibson conducted a review of the Division's policy manual, *Superintendent Regulations*, special education handbook and standard operating procedures (SOPs).

Board Policies and Superintendent Regulations

YCSD operates according to the policies established by the School Board of York County. When necessary, policies are implemented through *Superintendent's Regulations*. Policy development is a continuing

process, with all policies and regulations reviewed at least every four years or as needed due to changes in state or federal law or school division recommendations.[16]

The Division has eight policies that specifically reference students with disabilities. Below are excerpts from these policies:

- *IA (Instructional Goals and Objectives)* – The School Board will develop and implement a program of instruction for grades kindergarten through 12 that is aligned to the Standards of Learning established by the Board of Education and that meets or exceeds the requirements of the Board of Education. The School Board will also implement "early identification of students with disabilities and enrollment of such students in appropriately differentiated instructional programs."

- *IAA (Notification of Learning Objectives)* – The School Board will notify the parent of students with disabilities who have an Individualized Education Program (IEP) and who fail to meet the graduation requirements of the student's right to a free and appropriate education to age 21, inclusive, pursuant to Va. Code § 22.1-213 et seq.

- *IGBA (Programs for Students with Disabilities)* – The School Board provides a free, appropriate public education for all children and youth with disabilities, ages 2 through 21, inclusive, who are residents of York County, Virginia. To the maximum extent appropriate, students with disabilities are educated with children who are not disabled. An Individualized Education Program (IEP) is developed and maintained for each child eligible for special education under the Individuals with Disabilities Education Act. This IEP is reviewed at least annually and includes areas specified by state and federal statutes and regulations. A copy of the procedural safeguards available to the parent(s) of a child with a disability is given to the parent(s). School Board maintains an active and continuing child find program designed to identify, locate and evaluate those children residing in the division who are birth to 21 inclusive who are in need of special education and related services.

- *JGDA (Disciplining Students with Disabilities)* – Students with disabilities, who violate the student code of conduct, or engage in conduct for which they may be disciplined, will be disciplined in accordance with this policy. Additionally, the regular disciplinary procedures must be followed. School personnel may consider any unique circumstances on a case-by-case basis when determining whether to consider a change in placement for a child with a disability as a result of discipline. This policy addresses the following topics: Long-Term Suspensions, Expulsions or Short-Term Suspensions Which Constitute a Pattern – Change in Placement; Short-Term Suspension; Functional Behavior Assessments and Behavior Intervention Plans; Educational Services While Disciplined; Manifestation Determination; Disciplinary Action for Behavior that is Determined Not to be a Manifestation; Disciplinary Action and/or Alternative Placement for Behavior That Is Determined To Be a Manifestation; Interim Alternative Educational Settings for Weapons and Drugs and Infliction of Serious Bodily Injury; Change of Placement by Hearing Officer; Placement

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[16] https://yorkcountyschools.org/aboutUs/schoolBoard/policy.aspx

During Appeals; Students Not Identified as Disabled; and Disciplining Certain Section 504 Students Who Violate Alcohol and Drug Policies.

- *JGDB (Discipline of Students with Disabilities for Infliction of Serious Bodily Injury)* – A student with a disability may be removed without parent consent and assigned to an interim alternative education program by school personnel for not more than forty-five (45) school days when the student has inflicted serious bodily injury upon another person while at school, on school premises, or at a school function under the jurisdiction of a state or local educational agency. This option is available regardless of whether a manifestation exists.

- *JDE/JGE (Student Suspension/Expulsion)* – Students with disabilities identified through the Individuals with Disabilities Education Improvement Act (IDEIA) and students with disabilities identified Section 504 of the Rehabilitation Act of 1973 have specific rights that impose some limitations and additional responsibilities for the School Division to ensure that the students are not discriminated against based on their disability. A recommendation for long-term suspension or expulsion cannot be made until after this determination. In addition, under the IDEIA, students with disabilities who have been placed on long-term suspension or expulsion must be provided access to the curriculum; access may be provided in the home or another setting outside of the school.

- *JM (Restraint and Seclusion of Students)* – Physical and mechanical restraint and seclusion may only be used consistent with this policy. "Physical restraint" means the use of physical force to restrict the free movement of all or a part of a student's body. "Mechanical restraint" means the use of any device or material attached to a student's body that restricts freedom of movement or normal access to any portion of the student's body and that the student cannot easily remove. Excluded from this definition is the use of procedures the use of which is documented in the student's Individualized Education Plan (IEP), Section 504 plan, or behavior intervention plan; "Seclusion" means the confinement of a student alone in a separate enclosed space, in a manner that prevents the student from leaving. Seclusion is permitted in accordance with a student's IEP, Section 504, or behavior intervention plan, or to prevent injury to the student or others. When a student is placed in seclusion, he or she will be monitored by a staff member in close proximity. A parent or guardian will be notified in writing within a reasonable period of time, not to exceed 15 school days, after any use of: 1) physical restraint or 2) seclusion resulting in observed physical injury to the student.

- *JO (Student Records)* – Parents of students or eligible students may inspect and review the student's education records within a reasonable period of time, which shall not exceed 10 days, and before any meeting regarding an IEP or hearing involving a student with a disability. Further, parents have the right to a response from the school division to reasonable requests for explanations and interpretations of the education record. Parents/Guardians and eligible students may be charged a fee for copying scholastic record data. That fee may not exceed the cost of reproduction. The York County School Division does not charge a fee for copying an Individualized Education Plan (IEP) or for a copy of the verbatim record of a hearing conducted in

accordance with the *State Board of Education's Regulations Governing Special Education Programs for Children with Disabilities in Virginia*.

YCSD has four *Superintendent Regulations* that specifically reference students with disabilities. Below are excerpts from these regulations:

- *IAA (Learning Objectives)* – School personnel meet annually with the parents/guardians of students with disabilities as part of the student's Individualized Education Program (IEP). In this annual meeting, the Case Manager shall inform the parents/guardians of their student's right to a free and appropriate education. Starting in Grade 9, parents/guardians of students with disabilities are also notified through the annual IEP meeting about their student's progress toward meeting the requirements for a standard or advanced studies diploma and the length of time students with disabilities may stay in school.

- *IGBG (Online Courses and Virtual Program*) – Students may be enrolled in the York County School Division Virtual High School (VHS) as an additional instructional program to the regular classroom setting through an approval process…placement by Student Services for homebound instruction or as a result of an IEP Team decision.

- *IKFA (Locally Awarded Verified Credits for the Standard Diploma and Verified Credit Waivers)* – The Board of Education amended the Standards of Accreditation (SOA) in June 2012 to permit credit accommodations for students with disabilities pursuing a Standard Diploma. Each student's Individualized Education Program (IEP) or 504 Plan determines whether credit accommodations are appropriate.

- *JFE (Service Animals in Public Schools)* – An individual with a disability is permitted to be accompanied by his/her service animal on school property when required by law, subject to procedures established by the York County School Division.

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Standard Operating Procedures

Superintendent Regulations CBA-1 (Handbook Operating Procedure) directs the Superintendent to establish standard operating procedures (SOP) in administrative matters of a continuing or repetitive nature. *"A logical adjunct to the SOP system is an array of handbooks used to conduct business in the school division. The publishing of handbooks is to enhance administrative efficiency by providing an organized information system. Handbooks formalize the School Division's corporate memory and make it readily available to employees as well as other concerned parties. Handbooks contribute to the efficient administration of practices and procedures within the school division. All handbooks are to be posted on the school division's intranet (SID)."*[17]

Observation 9: The Special Education Handbook does not contain all relevant policies and standard operating procedures necessary for the implementation of the Division's special education program.

Based on Gibson's review of the Special Education Handbook (the Handbook) and discussions with OSS leadership, the Handbook is a work in process. The 2017-18 Special Education Handbook (the most current version) is 33 pages in length and includes the following components:

- Contact information for Student Services staff (3 pages)

- Listing of Student Services responsibilities for each staff (2 pages)

- Introduction and brief description of the special education process (1 page)

- Response to Intervention (RtI) process and referral for special education (2 pages)

- Initial evaluation and re-evaluation process (3 pages)

- IEP development process and the essential components of an IEP (4 pages)

- Frequently asked questions (4 pages)

- Extended School Year (ESY) standard operating procedure (2 pages)

- Transfer IEPs standard operating procedure (2 pages)

- Prior Written Notice (PWN) standard operating procedure (2 pages)

- Manifestation Determination Review (MDR) standard operating procedures (3 pages)

- Procedural guidelines for placement in and exiting the Behavior Support Program (BSP) (2 pages)

- Procedural guidelines for placement in the Communication Support Program (CSP) (1 page)

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[17] *Superintendent Regulations* CBA-1 (Handbook Operating Procedure).

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Additional SOPs that are not included in the Handbook but were provided separately to the review team include:

- Administrative Leave for Special Education Staff Providing Services in the Absence of a Colleague on Long-Term Leave

- Calculator and Arithmetic Tables Accommodation Criteria for Students with Disabilities

- Evaluation, Selection, and Assignment of Assistive Technologies for Students with Disabilities

- Homebound Instruction

- Private Duty Nurses Accompanying Medically Fragile Children with Disabilities to School

- Project Experience Students Working in YCSD Sites Other than their Assigned Schools

- Read-Aloud Audio Accommodation Criteria for Students with Disabilities

- Service Animals in Public Schools

- Special Education Classroom Observations by Parents and Independent Educational Evaluators

Per the *Superintendent Regulations*, all SOPs are maintained on YCSD's intranet, SID. Following are the review team's observations of the Special Education Handbook and other standard operating procedures:

- The Special Education Handbook is not current.

- Not all SOPs are included in the Special Education Handbook.

- Standard operating procedures do not exist for all relevant processes (e.g., placement in the Multiple Disabilities Program (MDP)).

- YCSD does not have a handbook or standard operating procedures to address Section 504 requirements. The Director of Student Services advised the review team that a guidance document and frequently asked questions (and possibly a standard operating procedure) is in the process of being developed.

- The RtI handbook was last updated in 2008 and is also lacking current information and detailed standard operating procedures that would be useful to administrators and staff implementing RtI. This is discussed further in *Chapter 4 – Program Implementation*.

Additionally, staff provided feedback to the review team that some of the SOPs that do exist are not at a sufficient level of detail needed to guide them in their implementation of special education programs and services.

Having a comprehensive Handbook that includes all relevant policies and standard operating procedures will provide several benefits, not only for employee training purposes and to ensure that staff work efficiently, but also because nearly every process that involves students with disabilities (and Section 504) is dictated by federal and state regulatory requirements that could present compliance risks if procedures are not followed and tasks are not performed to a standard. To this point, YCSD has not been in

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compliance with Indicators 4A and 4B (Suspension/Expulsion) for the past several years, and in 2017-18 the VDOE concluded[18] that *"the policies, procedures or practices contributed to the significant discrepancy and do not comply with requirements relating to the development of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards."* The review team also noted inconsistent practices with respect to the development of IEPs (discussed further in *Chapter 4 – Program Implementation*).

Recommendation 7: Update the Special Education Handbook to include references to relevant federal and state law, Board policy and OSS standard operating procedures.

The OSS should complete the development of the Special Education Handbook as soon as possible so that it includes all relevant policies and procedures necessary for the operation of a fully compliant special education program. As part of this process, staff should review all existing procedures to determine if they need to be expanded upon. The Handbook should incorporate references to all federal and state requirements and indicate how they will be implemented within YCSD. Further, the Handbook should be user-friendly and should serve as the basis for comprehensive training for all staff responsible for and involved in the education of students receiving special education services. The Handbook should be reviewed annually and updated as needed. Separately, comprehensive Section 504 and RtI handbooks should also be developed. During the course of this review, the review team provided the Director of Student Services an exemplary special education procedures manual from another school division that can serve as a guide and a best practice standard. The OSS reorganization and reduction of the Director's span of control (see Recommendation 1 in this chapter) are prerequisites for the Director to dedicate the needed time to implement this recommendation.

Accountability and Compliance Management

IDEA requires each state to report to the public on state-level data and individual school division-level data and to report on whether the state and the divisions met state targets described in the state's special education State Performance Plan (SPP)/Annual Performance Report. The established set of indicators Virginia monitors through the SPP include: Standards of Learning (SOL) achievement; graduation and dropout rates; disproportionate representation by race/ethnicity; placement rates in general education and more restrictive settings; and, disciplinary out-of-school suspensions/expulsions. The last two indicators are also monitored by the race/ethnicity of student subgroups. In 2017-18, YCSD did *not* meet the State's performance targets for the following indicators:

- *Indicator 4: Suspension/Expulsion*
    - 4a. Division identified with significant discrepancy in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs

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[18] http://www.doe.virginia.gov/special_ed/reports_plans_stats/special_ed_performance/division/2017-2018/spp-app/york.pdf

- 4b. Division identified with significant discrepancy, by race or ethnicity, in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs

- *Indicator 5: School Age Least Restrictive Environment (LRE)*

    - 5a. Students included in regular classroom 80% or more of the day

    - 5b. Students included in regular classroom less than 40% of the day

    - 5c. Students served in separate public or private school, residential, home-based or hospital facility

- *Indicator 7: Preschool Outcomes*

    - 7a. Positive social-emotional skills (including social relationships) – A2. % functioning within age expectations

    - 7b. Acquisition and use of knowledge and skills (including early language/communication and early literacy) – B2. % functioning within age expectations

    - 7c. Use of appropriate behavior to meet their needs – C2. % functioning within age expectations

- *Indicator 8: Parental Involvement*

    - Parents who report schools facilitated parent involvement as a means of improving services and results for children with disabilities

Observation 10: YCSD does not centrally monitor and track some special education compliance indicator and other outcome data.

Key compliance and outcome data are not centrally tracked or monitored by the OSS or any other department within the school division. Schools are responsible for maintaining these data but there are no standards around what data are to be collected and how data should be reported. Further, there are no expectations requiring schools to submit data to the OSS or other department for monitoring. This lack of oversight exposes the school division to an on-going risk of non-compliance. Following are data not centrally tracked or monitored in the Division:

- *Restraints and Seclusion* – Virginia permits the use of restraints and seclusion to reduce inappropriate or unsafe student conduct. Although permissible, YCSD should ensure that these behavioral techniques are only employed when the student's behavior poses a danger to himself or others; less restrictive behavioral management techniques have not curbed the behavior; or, the use of the technique has been considered and approved by the IEP team.[19] Further, *Board Policy JM (Restraint and Seclusion)* requires that *"a parent or guardian be notified in writing within a reasonable period of time, not to exceed 15 school days, after any use of: 1) physical restraint or 2) seclusion resulting in observed physical injury to the student."* Since this information is not monitored or tracked centrally by the OSS, there is no way to ensure that these techniques are

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[19] *The Answer Book on Special Education Law*, LRP Publications.

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not being used inappropriately or excessively on some campuses, or that *Board Policy JM* is consistently followed. Not only is the OSS unable to identify schools and/or staff that may need additional training, it is also unable to identify which campuses may be violating procedural safeguards and thereby increasing the risk of due process.

- *Manifestation Determinations* – The IDEA defines "manifestation determination" to mean the evaluation of the relationship between the student's disability and an act of misconduct that must be undertaken when a division proposes to take specified serious disciplinary actions.[20] The same review is required under Section 504 in connection with disciplinary actions that that constitute a significant change in placement under 34 CFR 103.35. The IDEA regulations require that the manifestation determination be made within 10 school days of any decision to change the placement of a child with a disability because of a violation of a code of conduct. Without a centralized process for tracking and monitoring this information, YCSD is at an increased risk for non-compliance.

- *Response to Intervention* data – The OSS currently monitors, on a quarterly basis, Phonological Awareness Literacy Screening (PALS) data that is entered into the Reading Progress Monitoring System (RPMS). However, this information is not monitored in such a way to enable SBO administrators to assess the overall effectiveness and fidelity with which RtI is implemented at each school. The OSS, for example, does not monitor the number of students in Tier 2 and Tier 3 for reading, math and behavior, among other things. This issue is addressed further in *Chapter 4 – Program Implementation*.

Recommendation 8: Implement systems and processes to collect and report special education compliance indicators and other outcome data.

The Director of Student Services reports that the OSS, in collaboration with the IT Department, is in the process of developing a data dashboard that would enable both the SBO and schools to view and disaggregate special education student performance data and other critical indicators. The Director of Student Services reports that the indicators discussed above will be included on the data dashboard. In order for this initiative to be successful, however, YCSD must first standardize on what data is to be collected from campuses, the frequency of data to be collected, and who at the campus-level will be accountable for ensuring data integrity (see also Recommendation 9 below). The OSS, in collaboration with other departments, must establish procedures and protocols for schools to follow when collecting and reporting those data for input in the dashboard. Once processes are in place, the OSS should also create school-specific report cards and review with school administrators every nine weeks as part of an overall school support plan.

Observation 11: There are data integrity risks with special education student-level data at schools.

In the early stages of this special education program review, the review team requested and received special education student-level data from YCSD. Working with the Information Technology Department,

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[20] See 34 CFR 300.530(e).

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the Direct of Student Services provided Gibson with an extract of student data from the Division's student information system (Aspen). As part of this process, the review team conducted reasonableness testing of the data received in order to validate student enrollment counts, overall and by primary disability and placement setting, among other data fields. Gibson compared enrollment counts to the Fall Membership counts reported by the Virginia Department of Education, with some expected variation due to system limitations and/or extraction dates. After several iterations of extracting and vetting student-level data, both Gibson and the YCSD agreed that the data provided to the review team for analysis was accurate.

During this process, however, Gibson identified several issues with the student data, which appear to be due to the lack of sufficient data entry controls and validation procedures by campus registrars and/or clerical staff. For example, the review team initially identified 10 students in 2018, 6 students in 2017, and 1 student in 2016 with a Grade Level Code of PG (Post Graduate). According to the *Virginia Department of Education Specifications for Completing the December 1 Child Count Collection (Revised September 2018)*, a Grade Level Code of PG should only be used for students who remain in or return to school after receiving one of the three recognized diplomas in the Standards of Accreditation (Standard Diploma, Advanced Studies Diploma, or International Baccalaureate Diploma).[21] YCSD does not receive funding for students with a Grade Level Code of PG. Once discovered, this was immediately corrected by YCSD.

Another data integrity issue relates to the Regular Class Time Percent, which reflects the amount of time the student spends with non-disabled peers. Through analysis of student data, Gibson identified several students whose Regular Class Time Percent did not appear reasonable for 2019 given what they were in prior years. For example, Table 3.7 shows an extract from the student-level data provided to Gibson for this review. This student's Regular Class Time Percent increased from 65 percent in 2018 to 100 percent in 2019, while the Special Education Primary Disability Service Percent of Day also increased from 55 percent to 82 percent. These trends point to the possibility of data integrity risks.

Table 3.7. Student-level Data – Example Student

Year	Grade	Special Ed Student Placement Code	Special Ed Student Regular Class Percent	Special Ed Primary Disability Service Percent of Day
2015	8th grade	Public Day School	100	23
2016	9th grade	Public Day School	54	53
2017	10th grade	Public Day School	54	92
2018	11th grade	Public Day School	65	55
2019	12th grade	Public Day School	100	82

Source. YCSD Combined Student Data 2015-2019_MOY.xlxs.

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[21]http://www.doe.virginia.gov/info_management/data_collection/student_record_collection/tip-of-the-week/2016/06-jun/index.shtml

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Recommendation 9: Assign a dedicated staff resource to data analysis, data verification, and data entry training.

To ensure data integrity, YCSD should assign a dedicated staff member with the responsibility for data analysis and data verification of all special education student data. This staff member should also provide on-going training to school registrars and other clerical/administrative staff responsible for entering special education student data into YCSD's student information system. Below are specific functions suggested for the position:

- Conduct reasonableness testing of special education data to identify anomalies.

- Conduct periodic special education/504 data audits at schools to validate the timeliness and proper coding of students, and report results to School Principals and the OSS administrators. Follow-up audits may be needed for schools with significant data integrity exceptions.

- Analyze student outcome data by school, by disability type, by instructional setting, and by student. This information should be provided to OSS and school administrators to support student-level, school-level, and division level performance measurement and decision-making.

- Conduct annual training on special education data entry and coding procedures, and conduct targeted training based on results of data audits.

YCSD has recently posted a position for a data analyst to support all academic programs. If this position cannot dedicate sufficient time to meet the OSS data analysis, data integrity, and training needs, the OSS should consider creating its own position to support these needs.

Financial Management

The York County School Division spends more than $16 million annually serving its students with disabilities, representing just over 10 percent of its operating budget (all funds) in FY 2019. Total spending has increased over the past five years primarily because of the increase in students with disabilities and the commensurate state requirements for staffing loads related to special education – as discussed earlier in this chapter. Table 3.8 presents actual special education expenditures by expenditure type for YCSD from FY 2014 to FY 2018. Over this time period expenditures increased 15 percent or approximately 3.5 percent annually. However, since FY 2016 expenditure growth has been flatter, with 2.3 percent growth over the two-year period.

Table 3.8. YCSD Special Education Actual Expenditures, FY 2014 – FY 2018 (All Funds)

Expenditure Type	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018
Personal Services	$8,781,068	$9,285,365	$9,950,246	$10,029,253	$10,134,828
Employee Benefits	3,872,613	4,125,926	4,142,492	4,367,927	4,706,104
Purchased Services	675,344	554,320	655,506	606,471	219,290
Other Charges	68,655	67,812	52,903	40,718	59,393
Materials and Supplies	184,102	407,147	262,607	95,059	143,455

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Payments to Joint Operations	642,655	768,314	937,702	1,202,065	1,089,471
Capital Outlay	20,239	13,794	38,213	19,857	51,628
Total	**$14,244,676**	**$15,222,678**	**$16,039,669**	**$16,361,350**	**$16,404,169**

Source. YCSD SPED Expenditure Report-FY14-18.xlxs.

The vast majority of special education expenditures relates to Salaries (Personal Services) and Employee Benefits. The next highest expenditure relates to Payments to Joint Operations, which reflects tuition payments to regional (cooperative) providers of special education services. Payments to Joint Operations has also seen the highest expenditure growth over the past five years, increasing 87 percent from FY 2014 to FY 2017 before declining 8.4 percent in FY 2018. Private (tuition) placements are much more expensive than regional providers, but are needed when regional programs are at capacity. Private placement services range from $30,000 to $60,000 per student depending on the student's needs. Tuition payments to private schools and other entities are included under Purchased Services.

On a per student-with-disabilities basis, special education spending has remained fairly flat during the past five years. Figure 3.5 presents actual special education expenditures per student (headcount) with disabilities for FY 2014 to FY 2018. Expenditures per student increased 6.6 percent over the five-year period, or an average of approximately 1.6 percent annually. FY 2018 showed a drop in per student spending from FY 2017.

Figure 3.5. YCSD Special Education Actual Expenditures per Student with Disabilities, FY 2014 – FY 2018 (all funds)
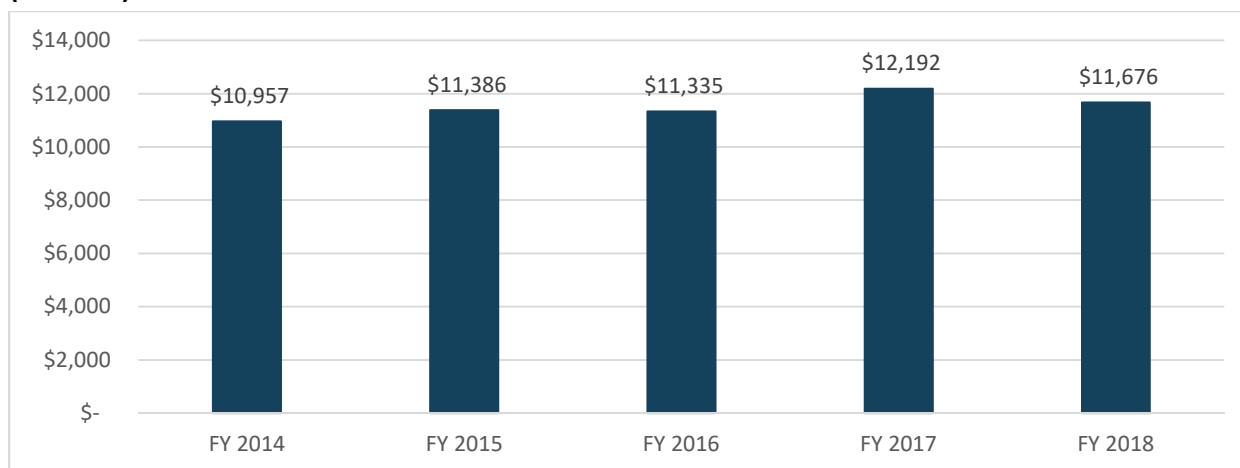
Source. YCSD SPED Expenditure Report-FY14-18.xlxs.

IDEA contains a Maintenance of Effort (MOE) requirement for special education. Under this law, school systems must sustain Special Education spending on an aggregate amount or per student amount, unless certain qualifying exceptions are met. YCSD has met MOE requirements since FY 2014.

Benchmark Comparisons

Benchmark comparisons for special education spending are challenging in Virginia. The review team attempted to collect FY 2019 budgeted expenditure data from YCSD peer school divisions, as well as state averages for spending per student with disabilities. While some benchmark data were collected, several constraints were encountered:

- The Virginia Department of Education does not separately report special education expenditures in its state financial reporting. This prevented comparison of YCSD spending per student to the state average.

- School divisions vary in their budget reporting of special education. For the YCSD peer divisions selected for this evaluation:
   - Two divisions (Albemarle and Suffolk City) reported their budgets in a fashion similar to YCSD, separately showing school-based program spending and staffing on special education. Other central office special education expenditures were reported elsewhere, often as part of other programs or administrative functions. This prevented meaningful comparisons of total program expenditures.
   - One other division (Frederick) reported total special education expenditures, but did not separately report school-based program level expenditures. This division was compared to YCSD total actual special education expenditures (shown above) that were separately assembled by the YCSD business office for purposes of this evaluation.
   - One division (Rockingham) did not separately report special education spending in its budget at all.
   - Two divisions (Culpeper and Fauquier) reported program-level, school-based special education expenditures, but their amounts per student were less than one-half of that reported by YCSD, thus questioning the comparability of the information.

Analysis of other available information on the peer divisions showed different alignments of services than YCSD, complicating the comparison of special education administrative units and related expenditures. The YCSD Student Services organization includes social workers, school psychologists, and behavioral positions. In other divisions where data were available, these positions were often found in other organizational units. This prevented the reconstruction of program level special education administrative expenditures to support meaningful comparisons.

Two other states, Pennsylvania and Texas, report special education spending at the state level. These two states provide additional benchmark comparisons for YCSD. Figure 3.6 compares YCSD FY 2019 school-based program spending per student for Special Education for YCSD, Albemarle County, and Suffolk City Schools. YCSD ranked the lowest among the three comparable school divisions. It is important to note that conclusions cannot be drawn solely from the available benchmark and peer data.

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Figure 3.6. Special Education Program (School-Based) Expenditures per Student, FY 2019 Budget, YCSD and Comparable Peer Divisions (Operating Funds)
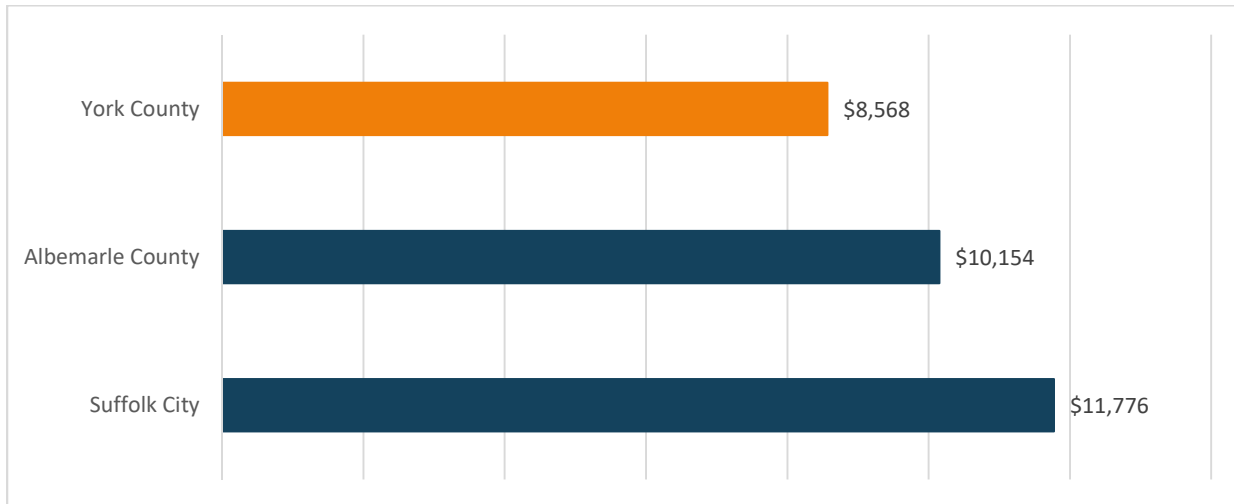
Sources. YCSD and Peer Division FY 2020 Budget Reports.

The three divisions above also reported Special Education FTE counts at the school level. This data supported the comparison of Special Education Student-Staff ratios. Figure 3.7 shows FY 2019 special education school-based pupil-staff ratios for York County, Albemarle County, and Suffolk City. These data show that YCSD has fewer special education school-based positions than the two comparable school divisions relative to their populations of students with disabilities.

Figure 3.7. Special Education Program (School-Based) Student-Staff Ratio, FY 2019 Budget, YCSD and Comparable Peer Divisions
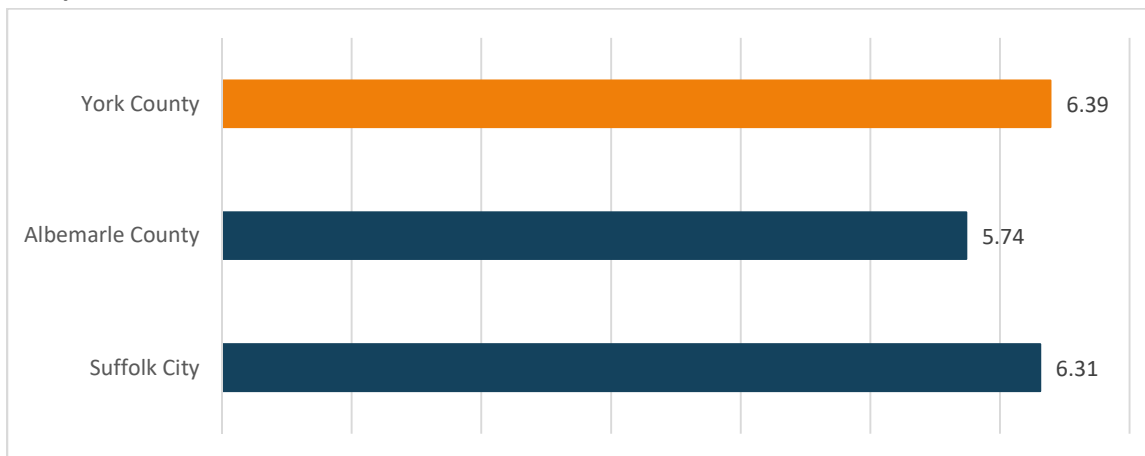
Sources. YCSD and Peer Division FY 2020 Budget Reports.

The review team compared YCSD FY 2018 Total Special Education program expenditures per student to one other school division and two states using the most recent state data available. York County also ranked the lowest in this benchmark comparison (Figure 3.8).

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Figure 3.8. Special Education Total Expenditures per Student, Other Benchmarks
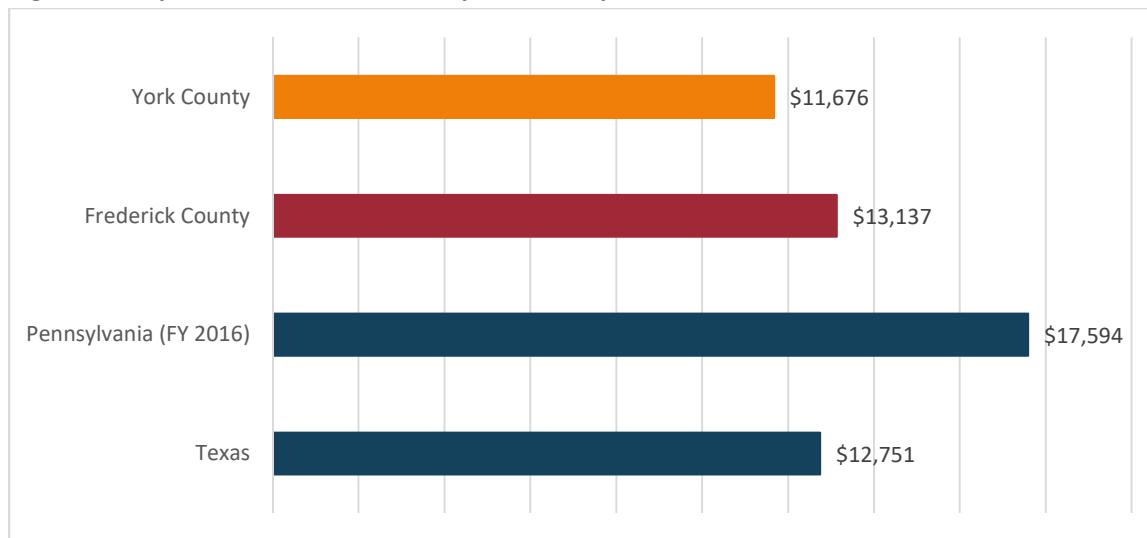
Sources. YCSD and Peer Division FY 2020 Budget Reports; Texas Education Agency TAPR reports; Pennsylvania Department of Education AFR files.

*Note: Pennsylvania has a similar Cost of Living Index as Virginia; Texas is approximately 10 percent lower.

Observation 12: Opportunities may exist to increase Medicaid Revenue.

One other benchmark comparison was made regarding Medicaid Revenue. Like most states, the Virginia Department of Education allows school divisions to submit claims to Medicaid for reimbursement for certain direct services included in student IEP, as well as certain indirect services (e.g., Administrative Claiming). The following direct services are eligible for reimbursement:

- Physical Therapy

- Occupational Therapy

- Speech-Language Pathology

- Nursing Services

- Psychological services provided by a psychologist or school social worker

- Personal Care Assistant Services (special education aides, nursing aides)

- Audiology Services

- Medical Evaluation Services

- Transportation

In FY 2019, YCSD budgeted $135,000 for Medicaid Revenue, up from actual Medicaid revenues of $103,364 in the prior year.

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Four peer school divisions reported Medicaid Revenue in their FY 2019 budget information. Figure 3.9 compares Medicaid Revenue per student with disabilities for York County, Albemarle County, Culpeper County, Fauquier County, and Suffolk City. These data shows a wide range of Medicaid reimbursement rates among school divisions.

Figure 3.9. Medicaid Revenue per Student with Disabilities, FY 2019, YCSD and Peer Divisions
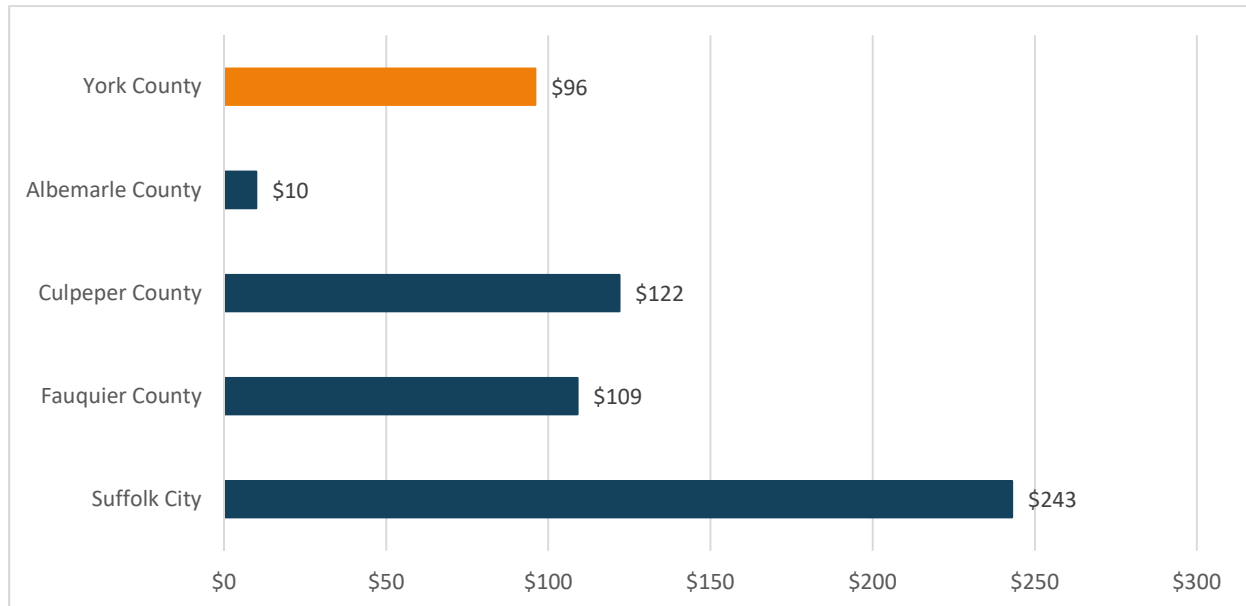
Sources. YCSD and Peer Division FY 2020 Budget Reports.

Recommendation 10: Seek outside assistance to explore additional Medicaid Revenue opportunities.

Gibson has seen reimbursement rates as high as $1,000 per student with disabilities in some states. YCSD should contact Suffolk City to learn about its Medicaid Reimbursement program, and/or contract with a Medicaid Reimbursement consultant to evaluate opportunities to increase its Medicaid Revenue. If YCSD could achieve Suffolk City's reimbursement levels, an additional $220,000 in Medicaid Revenue could be realized annually. While some cost would need to be incurred for tracking documentation and training, the financial benefits should significantly outweigh the additional cost.

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Chapter 4: Program Implementation

This chapter provides Gibson Consulting Group's (Gibson's) evaluation of the implementation of York County School Division's (YCSD) Special Education program. Specific areas of the review include student identification, student evaluation and eligibility, Individualized Education Programs (IEP), student placement and continuum of services, instructional practices, student behavior and discipline, and parent communication and involvement.

As presented in *Chapter 2 – Academic Profile*, YCSD students with disabilities achieve much higher outcomes than its peer divisions. This appears to be due to an increasing commitment to inclusionary practices, a very strong Tier 1 instructional program in the Division, and the dedication of Special Education program leadership and staff. However, additional opportunities exist to improve student outcomes, as well as other elements of the YCSD Special Education program and related services.

For example, the current approach to inclusion is highly burdensome on general education teachers. The review team found that too many high-need students (special education and others) are concentrated in single classrooms, co-teaching best practices are not applied, and implementation of inclusion is inconsistent within and across school types. YCSD should develop a model for inclusion and improve support for its implementation.

The review team also found that IEP files lacked academic rigor and contained several exceptions that may create compliance risks for YCSD. The Division should develop standards for Individualized Education Programs (IEPs) and conduct periodic audits to ensure quality and compliance standards are met.

While Response to Intervention (RtI) is not technically part of special education, as a system of intervention strategies, it significantly affects referrals to the special education program. The review team found that RtI is not consistently implemented across schools, its procedural documentation is not complete, and RtI data are not sufficiently tracked or analyzed to support decision-making and RtI effectiveness. YCSD should update RtI standard operating procedures and centrally monitor school RtI data.

Other recommendations in this chapter include providing increased professional development and guidance to IEP teams with respect to student placements, reviewing programs to ensure a full continuum of services for all students, expanding efforts to improve student behavior support systems, and improving parent communication and involvement.

Implementation of the recommendations contained in this chapter, combined with the recommendations in *Chapter 3 – Program Organization and Management*, will better position YCSD's Special Education program for long-term success as it continues to grow.

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Student Identification (Child Find)

YCSD total student enrollment has increased at a modest rate of 2.1 percent over the past five years, while special education student enrollment has grown at a much faster rate, increasing 17.9 percent over this same time period (see Figure 4.1).

Figure 4.1. YCSD Enrollment, 2014-15 to 2018-19

	2014-15	2015-16	2016-17	2017-18	2018-19
SWD	1229	1255	1313	1376	1449
Other Students	11,473	11,445	11,419	11,434	11,523
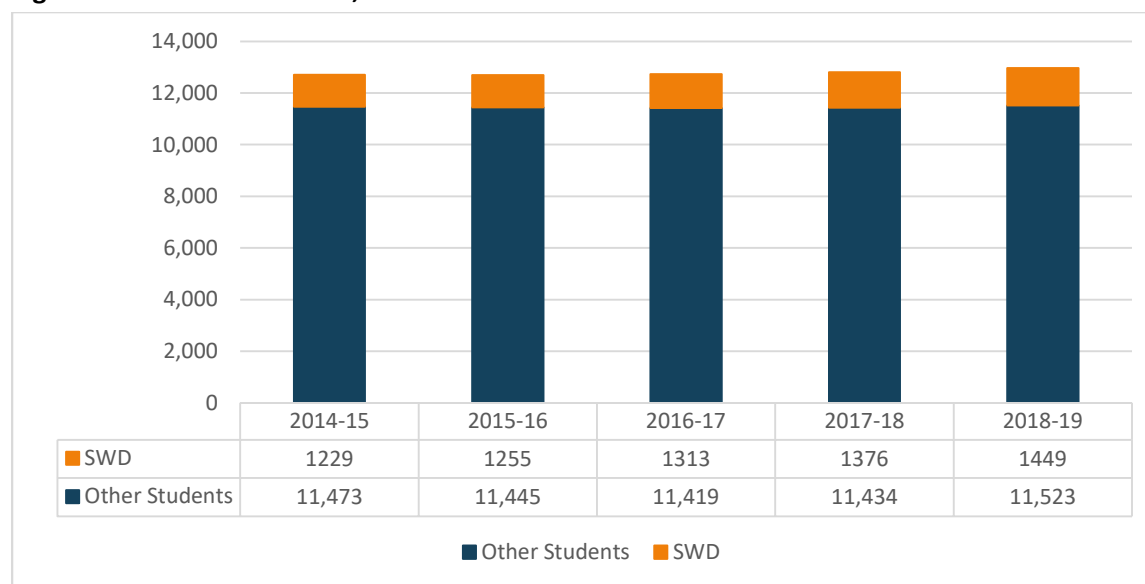
Source. Virginia Department of Education.

In 2018-19, the percentage of students receiving special education services in YCSD was 11.2 percent, which is 2 percentage points below the statewide average of 13.2 percent. YCSD has a lower percentage of students participating in the special education program than all but two of the six benchmark school divisions selected for comparison (see Figure 4.2).

Figure 4.2. Special Education Enrollment as a Percent of Total Division Enrollment, 2018-19
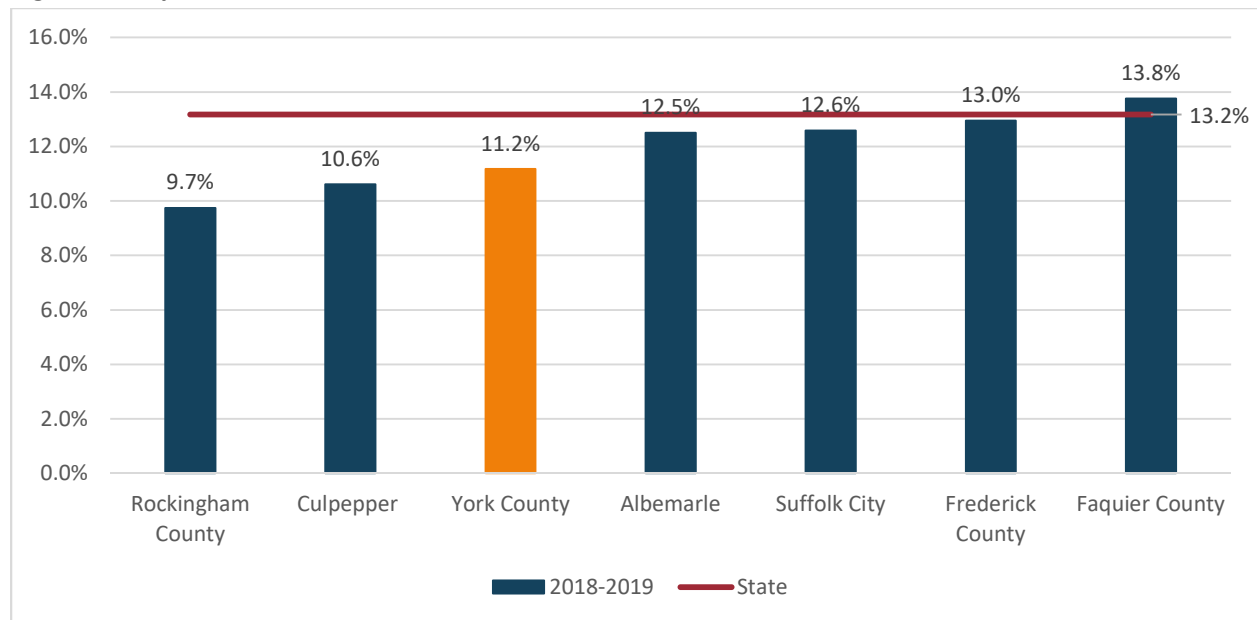
Source. Virginia Department of Education.

Part B of the IDEA (and Board Policy IGBA) places an affirmative, ongoing obligation of states and districts to identify, locate, and evaluate all children who are in need of special education services. This includes all children ages 3 to 21 who attend public or private schools, are home schooled, and/or are homeless or wards of the state. Child Find activities implemented in YCSD include parent and/or staff referrals, early childhood screenings, and general education intervention through multi-tiered support systems such as Response to Intervention (RtI). School division staff also collaborate with network service providers, such as Head Start, to identify and locate children who may need special education and related services.

Early Childhood Screening

An early childhood screening process, which may lead to a more comprehensive evaluation, is coordinated through the Division's school-based Child Study Teams, who are responsible for discussing intervention strategies and/or the need for an evaluation. YCSD's website directs parents to contact their child's principal or assistant principal at their child's zoned school, or the Office of Student Services for general information regarding the special education screening and eligibility process.

Response to Intervention

Response to Intervention is an instructional framework and philosophy of early intervention for students struggling to achieve or maintain achievement towards grade level performance standards. RtI is based on a problem-solving model that uses student performance data to guide decisions regarding effective instruction and interventions for students. The Virginia Department of Education permits each local educational agency to use a process for determining whether a child has a specific learning disability (SLD) based on the child's response to scientific, research-based intervention and permits each local educational

agency to use other alternative research-based intervention and procedures. Successful implementation of RtI involves three important components: 1) universal screening, 2) tiers of instruction, intervention, and support, and 3) progress monitoring.

In the context of an RtI intervention model, universal screening is the first step in identifying students who are at risk for learning difficulties. Universal screening is typically conducted three times per school year (fall, winter, and spring) and is used to identify or predict students who may be at risk for poor learning outcomes. Universal screening assessments are typically brief, conducted with all students at a grade level, and followed by additional testing or short-term progress monitoring to corroborate students' risk status. YCSD utilizes Reading Progress Monitoring System (RPMS) to universally screen and progress monitor students in Kindergarten through grade 5 in reading.

Observation 13: YCSD does not monitor the effectiveness of RtI intervention strategies across the Division.

Management and oversight of the Division's RtI program has historically been the responsibility of the Director of Student Services, although this responsibility is not explicitly referenced on the job description for this position. During the 2019-20 school year, this responsibility appropriately shifted to the Associate Director of K-12 Academic Services, who works closely with the Director of Elementary Instruction to support implementation. Although RtI is not within the purview of special education, it is considered here because the effectiveness of this intervention program strongly influences referrals to special education, particularly for students with a suspected learning disability.

At the school level, responsibility for the management and coordination of the RtI program varies both across and within levels. Only two elementary schools, Grafton Bethel Elementary and Mount Vernon Elementary, have an Assessment, Compliance, and Intervention (ACI) Coordinator position explicitly responsible for managing RtI referrals, coordinating RtI team meetings, and overseeing interventions and progress monitoring activities; at the time of this review, YCSD was budgeting for additional positions. These responsibilities fall to the assistant principal at all other elementary schools. At the middle school level, responsibility for RtI varies by school – Yorktown Middle School and Queens Lake Middle School assign responsibility to an Assessment and Compliance Coordinator (ACC), Tabb Middle School assigns responsibility to a special education chair, and Grafton Middle School assigns responsibility to a school guidance counselor. At the high school level, RtI referrals and interventions are managed by the special education lead teachers.

School-based administrators and staff reported in focus groups that they do not have sufficient guidance and support from the School Board Office (SBO) to implement RtI consistently and with fidelity. The RtI Implementation Guide provided to the review team is dated 2008. Not only has it not been updated in more than 10 years, but the information in it is also not at a level to be useful to staff to sufficiently guide them on the processes and procedures related to screening students, providing interventions, and progress monitoring. Further, the current special education handbook (2017-18) provides a high-level overview of the RtI process, and links to key forms, but it does not provide any detail to guide school staff

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on standard operating procedures. None of the RtI materials reviewed by the review team addressed behavioral interventions.

As part of this review, Gibson requested information from YCSD on the number of students in Tier 2 and Tier 3 by school for reading, math, and behavior as of the Fall Membership snapshot.[1] YCSD does not track these data centrally and therefore was unable to provide the review team with any data for analysis.

During interviews and focus group sessions, staff provided feedback to the review team that the RtI program was not implemented consistently and with fidelity across elementary schools, and was not implemented at most secondary schools. In response to the survey, 81 percent of staff agreed that their "school implements a multi-tiered system of supports to support the academic and behavioral challenges of students", while 62 percent agreed that the "RtI process at my school is effective in addressing the needs of students who are experiencing difficulty in school". These perceptions varied widely across schools, however (see Figure 4.3).

Figure 4.3. Staff Survey Responses – Multi-Tiered System of Supports and Response to Intervention – Percent of Staff in Agreement
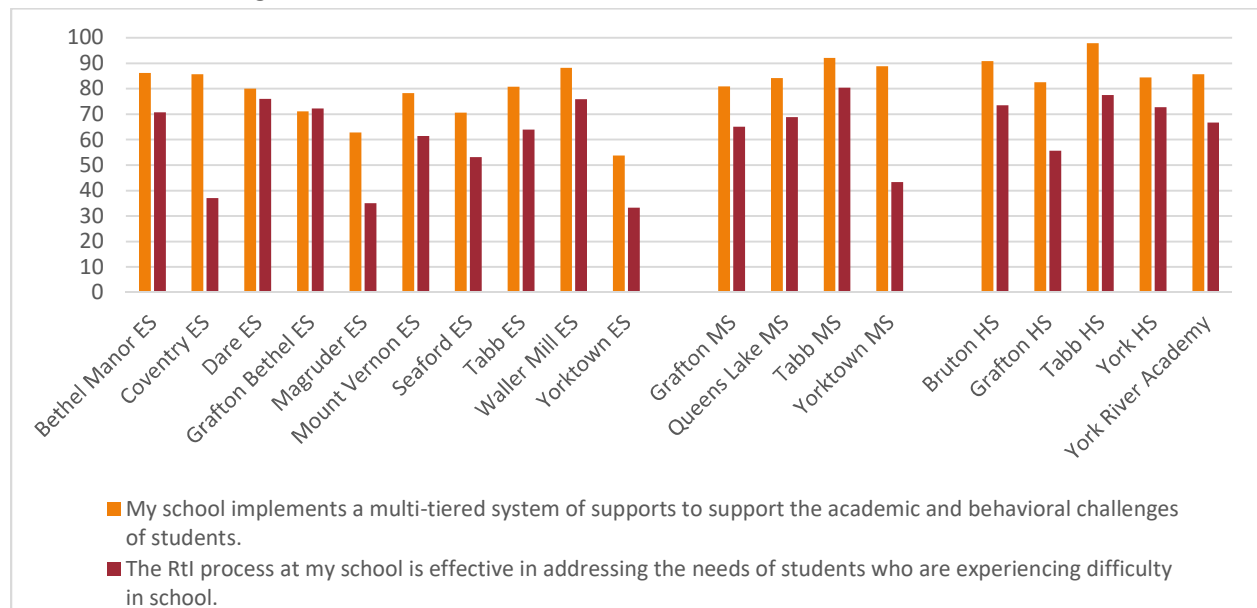
Source. Gibson Staff Survey (Q12_17, Q12_5).

Although schools are required to use the Child Study Team/RtI Tracking form (I-SE-9) to track interventions provided to students, Division administrators report that there is not a consistent process for inputting data into the RtI tracking form and that data are not digitally tracked nor centrally monitored by the SBO.

Staff also provided input that some students are "hung up" in the RtI process and are not receiving a timely referral for special education evaluation. Implementation of RtI cannot be used to delay or deny a timely initial evaluation for a child suspected of having a disability. The challenge, staff reported, is

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[1] VDOE annually collects statistics on the number of students enrolled in public school on September 30.

determining if there are sufficient data to indicate that a referral for special education should be made. This feedback appears to be supported by the fact that YCSD has a significantly lower percentage of students identified as having a Specific Learning Disability (25.4%) than both the benchmark division (32.4%) and State (31.8%) averages, and the percentage of students identified as SLD varies widely across elementary schools (ranging from 8.7% at Seaford Elementary to 33.3% at Magruder Elementary). This is illustrated in Table 4.1 (in the following section).

Recommendation 11: Update RtI standard operating procedures and centrally monitor school-level RtI data.

Specific strategies the Division can take to enhance the implementation of RtI at all schools include:

- Consider expanding universal screening of students in the areas of math and behavior. Although most research on universal screening is in the area of reading, there is also research support for the utility of universal screening in the areas of math and behavior.

- Utilize *Virginia IEP* or invest in other web-based software to digitally monitor RtI data to better enable educators to evaluate student performance based on RtI tiers and determine if interventions are effective. There are numerous RtI software programs available in the marketplace, nearly all of which include data dashboard functionality to disaggregate student and school data to monitor and evaluate the effectiveness of interventions.

- Determine which position(s) should be responsible for overseeing RtI implementation at each school level and clearly articulate those responsibilities on position job descriptions. Special education teachers should not be responsible for overseeing RtI at any level. YCSD should also increase the number of ACI positions at elementary schools; small schools may be able to share a full-time equivalent (FTE) position.

- Update the RtI Implementation Manual to include all standard operating procedures and links to required forms. Ensure this manual is maintained and available on the Division's intranet, SID.

- Ensure that RtI processes are fully defined and used at all schools to provide research-based interventions when students demonstrate academic and/or behavioral challenges.

- Provide ongoing professional development to administrators and staff responsible for implementing RtI interventions and progress monitoring students and ensure that all professional learning aligns to defined procedures.

Student Evaluation and Eligibility

The Individuals with Disabilities Education Act (IDEA) lists 13 different disability categories under which children ages 3 through 21 can qualify for special education services. To qualify for special education and related services under the IDEA, a student must meet the definition of one or more of the 13 categories of disabilities *and* must need special education and related services as a result of their disability or disabilities.

Figure 4.4 illustrates the percentage of special education students in YCSD by primary disability over the past five years.[2] Students with Other Health Impairments (OHI) and Specific Learning Disabilities (SLD) account for more than half of all students with disabilities in YCSD. These two disabilities, along with Autism (AUT), Developmental Delay (DD), and Speech Language Impairment (SLI) are often referred to as "high incidence disabilities" because they typically comprise the most common disability types in school systems. The first four disabilities (OHI, SLD, AUT, and DD) are also commonly referred to as "judgmental disabilities" because they are open to varying interpretations of eligibility. As a result, students with similar characteristics may be identified as having different disabilities.

Figure 4.4. YCSD Students with Disabilities Representation by Primary Disability, 2014-15 to 2018-19
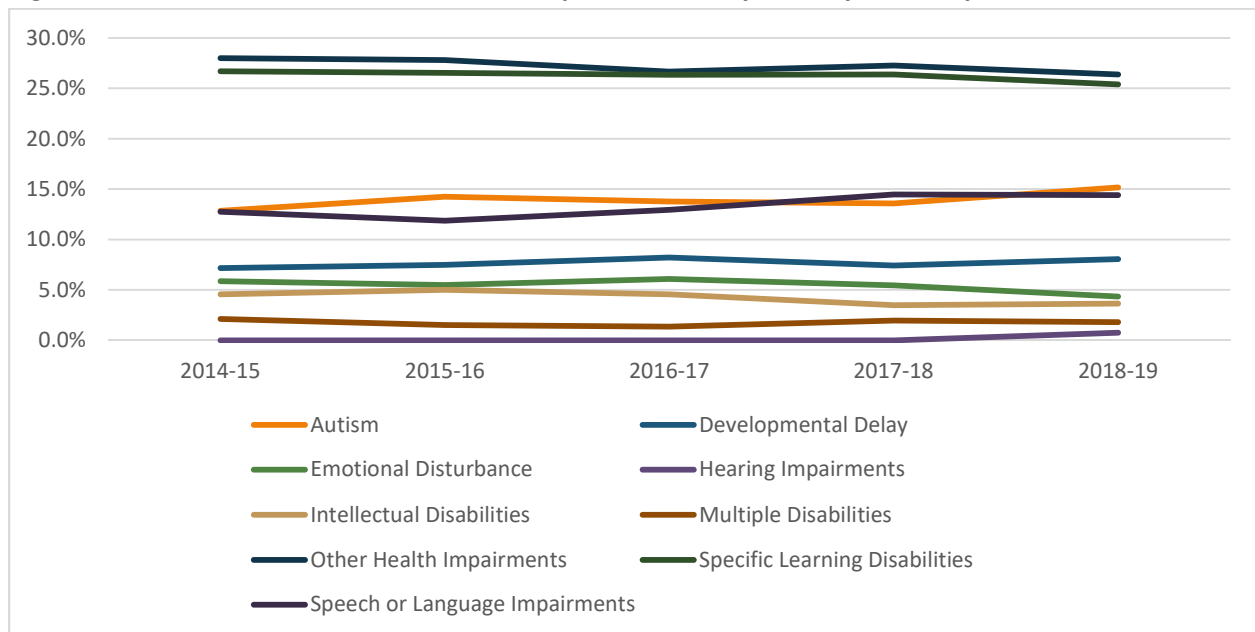
Source. Virginia Department of Education.

Table 4.1 compares the percentage of YCSD special education students by primary disability category to the benchmark school division and state averages. YCSD has higher rates of AUT, DD, and OHI and lower rates of SLD than the benchmark school division and state averages. YCSD's incidence rates for other disabilities are more in line with these benchmarks.

Table 4.1. Students with Disabilities Representation by Primary Disability, 2018-19, YCSD, Benchmark Division Average, and the VA State Average

Primary Disability	YCSD	Benchmark Division Average	VA State Average
Autism	15.2%	12.2%	12.9%
Deaf-Blindness	0.0%	0.0%	0.0%
Developmental Delay	8.1%	5.9%	7.8%

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[2] YCSD did not report any students with the following primary disabilities over the 5 years: Deaf-Blindness, Orthopedic Impairments, Traumatic Brain Injured, Visual Impairments.

Primary Disability	YCSD	Benchmark Division Average	VA State Average
Emotional Disturbance	4.3%	6.5%	5.6%
Hearing Impairments	0.8%	0.6%	0.8%
Intellectual Disabilities	3.7%	5.5%	5.1%
Multiple Disabilities	1.8%	2.4%	1.8%
Orthopedic Impairments	0.0%	0.3%	0.3%
Other Health Impairments	26.4%	19.9%	20.5%
Specific Learning Disabilities	25.4%	32.4%	31.8%
Speech or Language Impairments	14.4%	14.3%	13.1%
Traumatic Brain Injured	0.0%	0.0%	0.2%
Visual Impairments	0.0%	0.0%	0.0%

Source. Virginia Department of Education.

The IDEA defines the eligibility criteria for AUT, DD, OHI, and SLD as follows:[3]

- **Autism (AUT)** refers to *"a developmental disability significantly affecting verbal and nonverbal communication and social interaction, generally evident before age three, that adversely affects a child's educational performance."* This federal definition then proceeds to name traits commonly related to the condition: *"Other characteristics often associated with autism are engaging in repetitive activities and stereotyped movements, resistance to environmental change or change in daily routines, and unusual responses to sensory experiences"*.

- **Developmental Delay (DD)** – Because it is often difficult to obtain a medical diagnosis of certain disabilities in very young children, the IDEA gives states the option to recognize children ages 3 through 9, or any subset of that age range, who need special education and related services as a result of developmental delays in physical development, cognitive, communication, social or emotional development, or adaptive development as children with disabilities. Virginia recognizes and defines Developmental Delay as an eligibility category for children ages 2 through 6, and school divisions have the option, but are not required, to use this category. School divisions determine the criteria for being found eligible for services under the DD category.

- **Other Health Impairments (OHI)** encompasses a wide range of medical conditions and, according to the IDEA, the condition must result in the student's "limited strength, vitality, or alertness" and the condition must result in the need for special education and related services. Examples of chronic or acute health conditions which may render students eligible include asthma, attention deficit hyperactivity disorder, diabetes, lead poisoning, leukemia, and Tourette syndrome.

- **Specific Learning Disability (SLD)** is *"a disorder in one or more of the basic psychological processes involved in understanding or in using language, spoken or written, which disorder may manifest itself in the imperfect ability to listen, think, speak, read, write, spell or do mathematical calculations, including conditions such as perceptual disabilities, brain injury, minimal brain*

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[3] 34 CFR 300.8(a)(1).

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dysfunction, dyslexia, and developmental aphasia."[4] To determine whether a student is eligible for special education due to an SLD, the Division must evaluate the student in compliance with special evaluation procedures in addition to the general evaluation requirements for all students with disabilities.

Observation 14: The percentage of students with high incidence disabilities varies widely across schools.

Table 4.2 shows a comparison of the percentage of special education students for each high incidence disability across YCSD's 10 elementary schools, which is when most students are identified as eligible for special education and related services.

Table 4.2. Percent of Students with Disabilities by High Incidence Disability at Elementary Schools, 2018-19

Elementary School	AUT	DD	OHI	SLD	SLI
Bethel Manor	16.7%	23.5%	18.6%	9.8%	26.5%
Coventry	9.7%	16.7%	16.7%	22.2%	29.2%
Dare**	6.8%	11.9%	15.3%	11.9%	32.2%
Grafton Bethel**	22.3%	7.4%	16.0%	24.5%	21.3%
Magruder	8.9%	15.6%	15.6%	22.2%	30.0%
Mount Vernon**	36.7%	8.9%	11.4%	12.7%	24.1%
Seaford	5.7%	15.1%	26.4%	17.0%	32.1%
Tabb	7.9%	18.4%	15.8%	13.2%	39.5%
Waller Mill	6.4%	23.4%	14.9%	25.5%	25.5%
Yorktown	16.7%	12.2%	23.3%	15.6%	24.4%
ES Average %	**14.8%**	**15.1%**	**17.3%**	**17.2%**	**28.1%**

Source. YCSD Combined Student Data 2015-2019_MOY.xlxs.

**Specialized programs are located at Dare (MDP), Grafton Bethel (BSP), and Mount Vernon (CSP).

Although there is an expectation that some variation across schools will naturally exist, wide variations may be indicative of inconsistent implementation of identification and evaluation procedures or interpretation of assessment results, especially if these patterns are consistent over time. Although the Coordinators of Student Services attend all eligibility meetings (as described in *Chapter 3 – Program Organization and Management*), the lack of comprehensive standard operating procedures and on-going professional development for all staff involved in the evaluation process could be contributing factors in inconsistent practices amongst Child Study Teams at the school level.

Recommendation 12: Establish a Peer Evaluation Review Team to ensure consistency and/or quality control in the administration of student evaluations and interpretation of results.

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[4] IDEA 34 CFR 300.8(c)(10)(i).

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The primary purpose of a peer review team would be to ensure that evaluations are of high quality and consistent with Virginia Department of Education (VDOE) guidelines regarding disability categories. This process would also allow evaluation staff members to collaborate and receive on-going professional development regarding evaluation practices. YCSD should also:

- Ensure evaluation staff have access to and utilize a wide variety of assessments when conducting initial evaluations.

- Ensure evaluation staff are appropriately trained on the eligibility criteria for each disability category, particularly when state standards change for some disabilities.

- Monitor student referrals for evaluation and eligibility patterns and trends across schools to identify school outliers that may need more targeted training and support.

Disproportionality

Under Part B of IDEA, states must collect and examine data to determine whether *significant disproportionality* on the basis of race and ethnicity is occurring in the state, or its school districts, with respect to the identification, placement, and discipline of students with disabilities. (Note that discipline of students with disabilities is discussed further later in this chapter.) A review of YCSD's 2017-18 State Performance Plan (SPP) report found that YCSD is compliant with Indicator 9 (disproportionate representation of racial and ethnic groups in special education and related services due to inappropriate identification) and Indicator 10 (disproportionate representation of racial and ethnic groups in specific disability categories due to inappropriate identification).[5]

Individualized Education Programs

All children with disabilities, regardless of the type or severity of disability, have a right to a free and appropriate public education (FAPE) provided at public expense. An important part of the FAPE requirement is the IEP for each student. The IEP is the written document that sets forth the free, appropriate public education that is to be or has been offered to a child with a disability eligible to receive individualized programming and related services under Plan B of the IDEA. The IEP, developed by a multidisciplinary team, serves as an "educational roadmap" for a child with disabilities.

Observation 15: Some components of IEPs do not meet best practice standards and the overall quality of IEPs is inconsistent.

The review team conducted a comprehensive review of a sample of IEPs to assess whether or not IEPs are compliant, of high quality, and follow best practice standards. Of the 25 IEPs reviewed by Gibson, 6 IEPs met all of the review team's criteria for a high quality IEP. Below is a summary of the findings (i.e.,

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[5] http://www.doe.virginia.gov/special_ed/reports_plans_stats/special_ed_performance/division/2017-2018/index.shtml

exceptions) from the IEP file review. A description of the methodology and more detailed results of the IEP file review are contained in *Appendix C – IEP File Review*.

- IDEA requires that annual IEP reviews must be held, yet 4 of 25 IEPs reviewed had annual revision timelines that were not met. Further, a report from the *VA IEP* system showed that 44 students had annual IEP reviews that were overdue at the time of Gibson's review.

- Five of 25 IEPs reviewed meet all criteria for a well-written Present Levels of Academic Achievement and Functional Performance (PLAAFP) statement, including a complete description of the student's strengths and weaknesses; learning preferences; limitations or impediments to learning; objective data from current evaluations and/or progress monitoring; information on how the disability impacts involvement and progress in the general education curriculum; and, a description of benchmarks or short-term objectives if an alternate assessment is taken.

- Of the 25 files reviewed, 1 did not contain adequate justification for the student's placement in the least restrictive environment (LRE).

- Of the 25 files reviewed, 10 did not include quantifiable and measurable goals. Further, short-term objectives were not properly established to ensure incremental progress towards goals.

- All of the IEP files reviewed included accommodations and supports that appeared to be reasonable; however, 4 of the 25 files reviewed had in excess of 10 accommodations/supports, which can make it difficult to monitor and track their effectiveness.

- Three of the 25 IEP files reviewed included a functional behavioral assessment (FBA) and a behavior intervention plan (BIP), and all 3 were for students in an out-of-division placement. The review team had to separately request copies of the FBAs and BIPs, as they were not readily available in the student's on-line IEP file. YCSD provides a template to ensure that BIPs are legally defensible; however, not all BIPs met that criteria. Further, Gibson's review of the remaining IEP files found several students exhibited behaviors that would warrant a BIP.

- Four of 25 students whose IEPs were reviewed included a need for assistive technology (AT). However, Gibson identified one student who appeared to have a need for AT but there was no evidence in the IEP that this was considered.

- YCSD provides an Extended School Year Services (ESYS) Eligibility Worksheet to be used to document consideration of ESYS; however, only 1 of 25 files reviewed included this worksheet while 8 of 25 students received ESYS. The justification for not providing ESYS in many files was either omitted or did not include any language regarding critical skills or regression and recoupment.

- While all students who require a transition plan had one, Gibson identified several deficiencies in those transition plans, most notably the lack of age-appropriate transition assessments, post-secondary goals, and a limited number of transition activities and/or services.

- Two of the 25 IEPs reviewed did not include documentation to show that progress towards goals and objectives was monitored and reported. Further, 15 of the 25 IEP files reviewed showed no

mastery of a single goal or objective. This finding may create unacceptable risks for YCSD in light of recent court rulings.[6]

Observation 16: Both parents and staff report high agreement with the IEP development process.

Gibson surveyed parents and staff regarding their perceptions of the IEP development process. Overall, 79 percent of parents agreed that they had positive experiences at IEP meetings (see *Chapter 5 – Parent Insights and Satisfaction*), while staff reported overall high agreement on some important factors related to the development of IEPs (see Figure 4.5).

Figure 4.5. Staff Survey Responses – IEP Development, Agreement
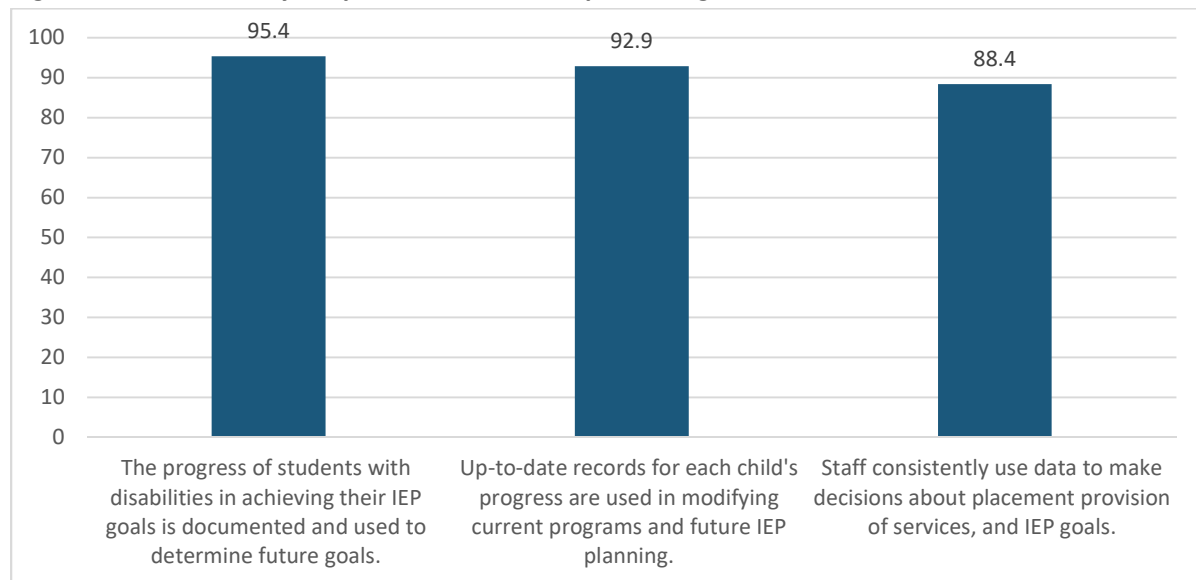
Source. Gibson staff survey (Q21_8, Q21_6, Q13_2).

Parents shared positive feedback about their experiences with the IEP development process and the quality of student services received, though parent opinions differed by the reported grade level and primary disability of their child (discussed further in *Chapter 5 – Parent Insights and Satisfaction*).

Recommendation 13: Develop standards for IEPs and conduct periodic audits to ensure quality and compliance standards are met.

A high quality IEP ensures compliance with all requirements of state and federal laws and regulations and reflects decisions based on the active and meaningful involvement of all members of the IEP team. The findings from the IEP file review indicate a need for additional training and enhanced processes for reviewing and monitoring both compliance and quality of student IEPs, including those students in out-of-division placements. To support the quality development of IEPs for all students, the OSS should:

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[6] "Questions and Answers (Q&A) on U.S. Supreme Court Case Decision Endrew F. v. Douglas County School District Re-1", United States Department of Education, Dec. 7, 2017, sites.ed.gov.

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- Articulate standards for IEP development and documentation, ensuring that the student's academic, developmental, and functional needs are considered.

- Develop division-wide processes for monitoring the progress of students with disabilities towards standards and the IEP goals and objectives. These monitoring efforts should include classroom walkthroughs specific to special education and the requirement of IEPs.

- Conduct routine and random sampling of IEP files at each school and assess them against the department's standards for compliance and quality. Provide direct and specific feedback to IEP teams and ensure that any deficiencies are immediately corrected.

- Provide targeted in-service training to all IEP teams using specific IEPs as examples of best practice or IEPs in need of improvement, particularly in the three problem areas where the majority of deficits occurred: quantifiable and measurable goals aligned with grade level standards, transition plans and services, and the inclusion of Behavior Intervention Plans (if appropriate). Professional development can take place during Professional Learning Community (PLC) meetings and/or during summer professional development training.

IEPs provide the framework for learning for students with disabilities. IEPs that address the above improvement opportunities will lead to more academic rigor, better instruction, and improved student outcomes.

Student Placement/Continuum of Services

The IEP Team determines the special education services a student will receive, which includes the location where those services will be delivered (i.e., placement). When making placement decisions, the IEP team must consider the least restrictive environment (LRE). According to the IDEA and the *Regulations Governing Special Education Programs for Children with Disabilities in Virginia*, LRE means that, to the maximum extent appropriate, children with disabilities (including children in public or private institutions or other care facilities) are educated with children who are not disabled, and that special classes, separate schooling or other removal of children with disabilities from the regular educational environment occurs only when the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily.[7] Each school division must provide a wide variety, or continuum, of alternative placements so that each child with a disability will have an appropriate individualized education program. The continuum includes the following placements:[8]

- **Attending a Regular Early Childhood Program** (Ages 0-5) – Used for every child attending a regular early childhood program, even if the child receives special education services in other environments. Regular Early Childhood Programs include: Head Start, Kindergarten, Reverse Mainstream Classroom, Private Preschool, Preschool Classes offered to an eligible pre-kindergarten population by the public school system, and Group Child Care.

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[7] http://www.doe.virginia.gov/special_ed/iep_instruct_svcs/inclusive/index.shtml. IDEA 34 CFR 300.114 through 34 CFR 300.120.
[8] VDOE website.

- **Separate Class: Special Education Classroom** (Ages 0-5) – Used for special education programs that include less than 50 percent non-disabled children.

- **Separate School** (Ages 0-5) – Used for students who receive educational programs in public or private day schools designed specifically for children with disabilities.

- **Residential Facility** (Ages 0-5) – Used for students who receive educational programs in publicly or privately-operated residential schools or residential medical facilities on an inpatient basis.

- **Home** (Ages 0-5) – Used for students who receive special education and related services in the principal residence of the child's family or caregivers.

- **Service Provider Location** (Ages 0-5) – Used for students who receive *all* of their special education and related services from a service provider.

- **Public Day School** (Ages 6-22) – Used for students when special education services are provided in a regular school setting. Students in this setting have access to non-disabled peers (even though the individualized education program may not call for involvement with non-disabled peers).

- **Public Separate School** (Ages 6-22) – Used for students served in separate buildings where only students with disabilities are served.

- **Private Day School** (Ages 6-22) – Used for students placed by the school division for purposes of special education into approved private school programs (e.g., licensed as private special education schools through the Virginia Department of Education).

- **Public Residential School** (Ages 6-22) – Used for students who reside and receive special education services in a state operated residential program. Students in these schools are reported by the state operated program.

- **Private Residential School** (Ages 6-22) – Used for students: 1) placed into a private residential school/program by the school division for purposes of special education, or 2) placed through the Comprehensive Services Act (CSA) for non-educational reasons into a residential program (e.g., a student in foster care placed through the Department of Social Services).

- **Homebound Placement** (Ages 6-22) – Used for students when special education services are provided in the home.

- **Hospital Program** (Ages 6-22) – Used for students who are placed in and receiving special education and related services in hospital programs.

- **Correctional Education Program** (Ages 6-22) – Use for students served in local jails and state correctional education programs.

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The continuum of placements must also:[9]

- Provide for supplementary services, such as a resource room or services or itinerant instruction, provided with general education classes.

- Include integrated service delivery, which occurs when some or all goals of the student's IEP are met in general education classes with similar-age children.

- Be based on the individual needs of the student, not a single model used for a specific population or category of children with disabilities.

- Be documented by the identification of each alternative considered and the reasons for the placement chosen.

- Provide for a program, if appropriate, with similar-age children.

Table 4.3 shows the total number of YCSD's special education students across the continuum of placement settings.

Table 4.3. YCSD Number and Percentage of Students with Disabilities by Placement Setting, 2019

Placement Setting	2019	% Representation
Ages 0-5	**178**	**11.8%**
Attending a Regular Early Childhood Program	92	6.1%
Separate Class: Special Education Classroom	60	4.0%
Service Provider Location	24	1.6%
Home	2	0.1%
Ages 6-22	**1,335**	**88.2%**
Public Day School	1,290	85.3%
Public Separate School	26	1.7%
Private Day School	11	0.7%
Homebound Placement	8	0.5%
Total Students with Disabilities	**1,513**	**100%**

Source. YCSD Combined Student Data 2015-2019_MOY.xlxs.

*Note: This analysis excludes students with an Active Status Code of N.

Figure 4.6 shows the total number of YCSD's Special Education students across the continuum of placement settings by primary disability.

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[9] Virginia Department of Education, Division of Special Education and Student Services, Parents Guide to Special Education (2010).

Figure 4.6. YCSD Number of Students with Disabilities by Placement Setting and Primary Disability, 2019
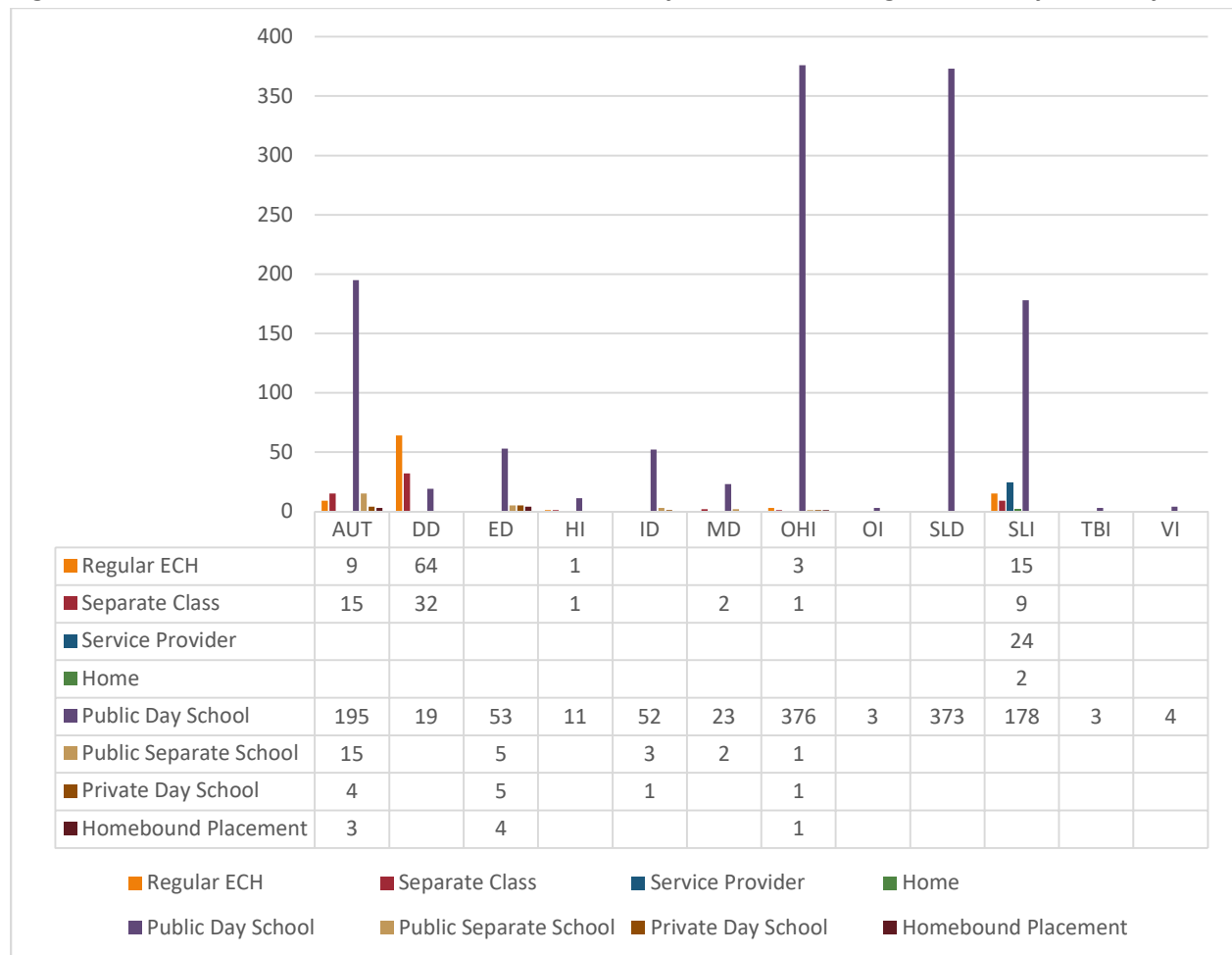
	AUT	DD	ED	HI	ID	MD	OHI	OI	SLD	SLI	TBI	VI
■ Regular ECH	9	64		1			3			15		
■ Separate Class	15	32		1		2	1			9		
■ Service Provider										24		
■ Home										2		
■ Public Day School	195	19	53	11	52	23	376	3	373	178	3	4
■ Public Separate School	15		5		3	2	1					
■ Private Day School	4		5		1		1					
■ Homebound Placement	3		4				1					

■ Regular ECH   ■ Separate Class   ■ Service Provider   ■ Home
■ Public Day School   ■ Public Separate School   ■ Private Day School   ■ Homebound Placement

Source. YCSD Combined Student Data 2015-2019_MOY.xlxs.

*Note: This analysis excludes students with an Active Status Code of N.

Attending a Regular Early Childhood Program (Ages 0-5) and Separate Class: Special Education Classroom (Ages 0-5)

YCSD's preschool programs include Early Childhood Special Education (ECSE), the Integrated Preschool Outreach Program (IPOP), and the Virginia Preschool Initiative (VPI). Head Start is a preschool program provided through the County of York. Each preschool program is described briefly below:

- Children ages 2 to 5 who are eligible for special education are served in YCSD's Early Childhood Special Education (ECSE) program. ECSE programs are located on all 10 elementary school schools.

- The Integrated Population Outreach Program (IPOP) is a language-based, preschool program offering a wide variety of enriching activities in a nurturing educational setting. IPOP is designed to serve children with and without disabilities in one preschool classroom (i.e., reverse inclusion program). IPOP programs are located on all 10 elementary school schools.

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- The Virginia Preschool Initiative (VPI) provides an educational program for children in Virginia who are considered at-risk for learning difficulties and prepares them to be successful in kindergarten. Students are engaged in high quality preschool education that encompasses health and nutrition services, social services, parental involvement, and transportation. YCSD's VPI program provides a variety of enriching activities in a nurturing educational setting designed to prepare children to be successful in kindergarten. There is no cost for the program. VPI programs are located on all elementary school schools except Waller Mill Elementary.

- Head Start (County of York) is a no cost preschool program serving children ages 3 to 5. Eligible children and their families must live in York County and meet income and other eligibility criteria. Head Start is a federally-funded program and staffed by the York County Government.

Research has shown that high-quality early services in inclusive settings are beneficial for all young children, their families, and their communities (Guralnick, 2001; National Professional Development Center on Inclusion, 2009; Odom, Buysse, & Soukakou, 2011; Wolery & Wilbers, 1994). Positive outcomes, including social and communication skills and academic achievement, accrue to children with and without disabilities in high-quality inclusive settings (Odom et al., 2004; Strain & Bovey, 2011).

Observation 17: YCSD met State targets on Indicator 6: Preschool LRE but did not meet State targets for Indicator 7, Preschool Outcomes in 2018.

Table 4.4 shows the percent of YCSD students in 2017-18 (the most current year available) with IEPs compared to the benchmark school divisions by the two monitored educational settings for Indicator 6: 6A) Children aged 3 to 5 with IEPs attend a regular early childhood program and receive the majority of special education and related services in the regular early childhood program, and 6B) Children aged 3 to 5 with IEPs attend a separate special education class, separate school, or residential facility. YCSD, along with three of the benchmark school divisions met both of the State's targets for Indicator 6A (Faquier, Frederick, and Rockingham) and Indicator 6B (Culpepper, Frederick, and Rockingham).

Table 4.4. Indicator 6: Preschool Least Restrictive Environment, 2017-18

Indicator/Division	6A. Children aged 3-5 with IEPs attend a regular early childhood program and receive the majority of special education and related services in the regular early childhood program	6B. Children aged 3-5 with IEPs attend a separate special education class, separate school, or residential facility
State Target	**>=34%**	**<=19%**
Albemarle	28.23%	28.71%
Culpepper	4.96%	0.71%
Fauquier	65.68%	32.54%
Frederick	76.47%	10.42%
Rockingham	64.29%	14.29%
Suffolk	27.70%	45.27%
York	**56.88%**	**16.25%**
State Average	**34.48%**	**25.43%**

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Source. Virginia DOE, 2017-18 Division Performance Reports.

Table 4.5 shows the percent of YCSD students with IEPs compared to the benchmark school divisions for the three monitored indicators for Indicator 7: 7A) Positive social-emotional skills (including social relationships), 7B) Acquisition and use of knowledge and skills (including early language/communication and early literacy), and 7C) Use of appropriate behavior to meet their needs.

For each indicator, two outcomes are monitored: 1) the percent of students entering below expectations, and 2) the percent of students functioning within expectations. For all three indicators, YCSD met the State's target for the percent of students entering below expectations but did not meet the State's target for the percent of students functioning within expectations.

Table 4.5. Indicator 7: Preschool Outcomes, 2017-18

Indicator/Division	7A. Positive social-emotional skills		7B. Acquisition and use of knowledge and skills		7C. Use of appropriate behavior to meet their needs	
Outcomes	% Below	% Within	% Below	% Within	% Below	% Within
State Target	>=90%	>=57.8%	>=93.9%	>=46.9%	>=90.9%	>=65.2%
Albemarle	86.96%	50.0%	78.57%	39.29%	78.57%	39.29%
Culpepper	81.25%	50.0%	92.31%	50.0%	80.56%	57.14%
Fauquier	100%	67.39%	100%	47.83%	100%	65.22%
Frederick	100%	65.71%	100%	40.0%	100%	65.71%
Rockingham	90.48%	46.15%	96.0%	38.46%	95.65%	46.15%
Suffolk	91.89%	29.73%	97.30%	40.54%	97.30%	29.73%
York	93.75%	53.62%	95.65%	46.38%	91.94%	53.62%
State Average	92.59%	52.88%	94.74%	44.36%	91.71%	60.04%

Source. Virginia DOE, 2017-18 Division Performance Reports.

Observation 18: Longitudinal data from the past 5 years indicate that students with disabilities in early childhood programs are educated less frequently with their general education peers.

The review team analyzed trends in student representation across the continuum of placement settings from 2015 to 2019 and found that representation in each placement setting remained relatively constant with two exceptions: the percent of students Attending a Regular Early Childhood Program decreased from 8.1 percent in 2015 to 6.1 percent in 2019, and the percent of students in a Separate Class/Special Education Classroom increased from 1.2 percent in 2015 to 4 percent in 2019 (see Figure 4.7). With the exception of 2017, the percent of students with disabilities in early childhood programs has remained relatively constant at approximately 10 percent, but there does appear to be a shift in educating young children in more restrictive placement settings (i.e., special education classrooms that comprise less than 50% of non-disabled peers).

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Figure 4.7. Students Attending a Regular Early Childhood Program (Ages 0-5) and Separate Class: Special Education Classroom (0-5), 2015 to 2019
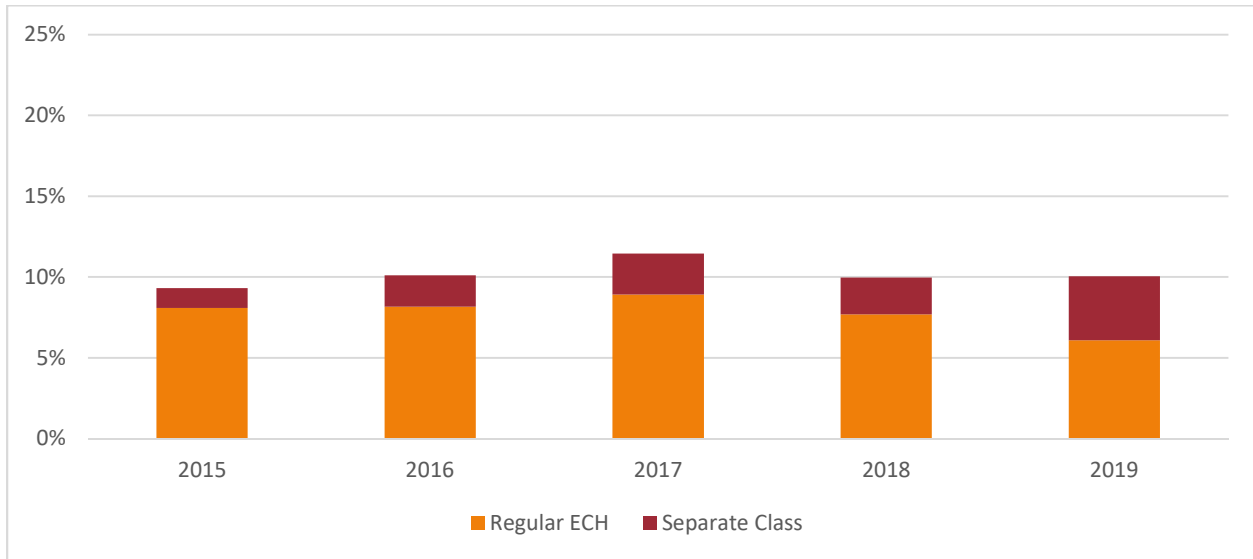
Source. YCSD Combined Student Data 2015-2019_MOY.xlxs.

Further analysis shows that shows that it is primarily students identified as AUT, DD, and SLI that are being placed in more restrictive settings (see Figure 4.8). Students with DD account for the largest subgroup of students ages 0 to 5. As described previously, some children ages 2 to 6 are assigned a primary disability of DD because it can be difficult to obtain a medical diagnosis of certain disabilities at such a young age.

Figure 4.8. Students Attending a Regular Early Childhood Program (Ages 0-5) and Separate Class: Special Education Classroom (0-5) by Disability, 2015 and 2019
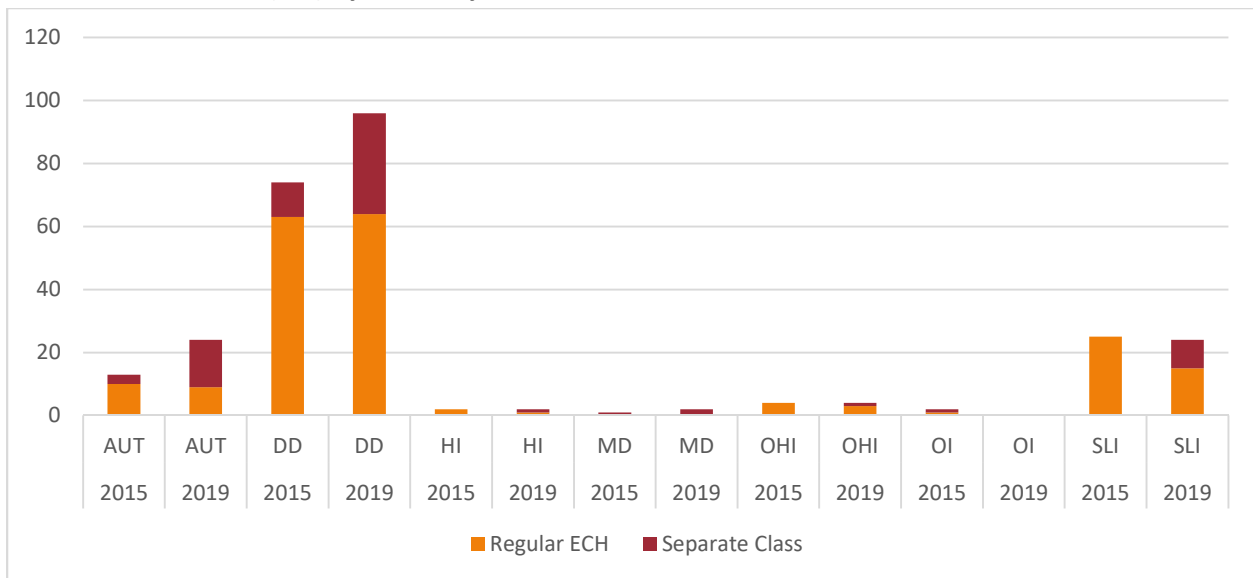
Source. YCSD Combined Student Data 2015-2019_MOY.xlxs.

Public Day School (Ages 6-22)

YCSD's continuum of programs and services for students ages 6 to 22 in Public Day School includes specially designed instruction, accommodations, and related services in general education, special education and/or community environments. Most students receiving special education services with the placement setting of Public Day School will receive their special education services at their home school through a continuum of services, which may include inclusion with in-class supports, pull-out/resource room, or co-teach. In addition, some students may require instruction and related services in a highly structured classroom environment (i.e., specialized program). YCSD's instructional service delivery model is described further below.

Inclusion/Resource

Students receiving special education services who are enrolled in general education courses may require accommodations and/or modifications to fully access the curriculum. The modifications and appropriate designations are determined by the IEP team and documented on the student's IEP. Special education students in kindergarten through grade 5 receive their minutes of service in either the general education setting or in a special education classroom setting. At least one resource room is housed on each elementary school where students can receive specialized instruction in reading, math and/or social skills.

Secondary school students can also receive their minutes of service in the general education classroom or in a special education classroom setting (i.e., resource room). Middle school applied academic courses include: Academic Lab, Applied English, Applied Math, Applied Science, Applied History/Social Studies, and Pre-Vocational Training and Independent Living. Secondary school courses include: Academic Lab, Algebra I/Math Lab, Business Individualized Education Program, Practical English, Practical Math, Practical Science, Practical History/Social Studies, Practical Life Skills, Pre-Vocational Skills, Project Explore, Project Experience, and Project Search.[10]

Specialized Programs

A specialized program is one of the instructional arrangements on YCSD's continuum of services to which a student may be assigned. These programs are offered in a self-contained classroom setting on select schools, where students stay full-time or part-time, depending on their IEP. Below is a brief description of each of these programs.[11]

Multiple Disabilities Program (MDP) – Students in this class are typically found eligible for special education under the category of multiple disabilities. Many of the students in this classroom have private duty nurses who attend school with them daily and attend to their medical needs (e.g., tube feeding, aspiration) on a scheduled basis. The student-staff ratio includes 1 special education teacher and 2 para-educators (although additional staff may be provided based on the individual needs of students) and a

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[10] YCSD 2018-19 Program of Studies: Secondary Registration and Information Guide.
[11] YCSD.

class size maximum of 8 students. The MDP is located at Dare Elementary School, Grafton Middle School, and Grafton High School.

Communication Support Program (CSP) – The CSP is for students with significant receptive and expressive communication deficits that receive special education services in YCSD. This program serves a wide spectrum of communication disorders ranging from non-verbal students who require augmentative or alternate communication to high functioning students who show significant impairments in the areas of social skills, ability to communicate their thoughts and feelings, and use of pragmatic language skills. The students may access these services through any disability that contains a communication component. Therefore, the parameter of the program does not limit its participants to students who qualify for speech language services or autism but may be served under certain disabilities whose defining characteristics contain communication deficits. A typical student-staff ratio includes 1 special education teacher and 2 para-educators for a class size maximum of 8 students. The CSP program is located at Mount Vernon Elementary School, Grafton Middle School, and York High School.

Behavior Support Program (BSP) – The mission of the BSP is to provide data driven, specialized instruction within a structured learning environment. IEP teams, including the student and parents, establish criteria for entering and exiting the program based on data related to student-specific goals and progress towards them. The student-staff ratio is 1 special education teacher and 2 para-educators (although additional staff may be provided based on the individual needs of students) for a class size maximum of 10 students. The BSP program is located at Grafton Bethel Elementary School, Tabb Middle School, and Tabb High School.

Observation 19: YCSD did not meet State targets on Indicator 5: School Age LRE in 2018.

Table 4.6 shows the percent of YCSD students with IEPs compared to the benchmark school divisions in general education classes by the three monitored educational settings for Indicator 5: School Age Least Restrictive Environment: 1) students with IEPs served in general education more than 80% of the time, 2) students with IEPs served in general education less than 40% of the time, and 3) students served in separate educational settings. In 2017, YCSD did not meet any of the State's targets, nor did most of the peer school divisions selected for comparison. Albemarle, Rockingham and Suffolk were the only school divisions to meet state targets for Indicator 5A, and Albemarle was the only school division to meet state targets for Indicator 5B. None of the comparator school divisions met the State's target for Indicator 5C.

Table 4.6. Indicator 5: School Age Least Restrictive Environment, 2017-18

Indicator/Division	5A. Students included in regular classroom 80% or more of the day	5B. Students included in regular classroom less than 40% of the day	5C. Students served in separate public or private school, residential, home-based or hospital facility
State Target	>=70%	<=8%	<=2.5%
Albemarle	77.42%	6.54%	5.71%
Culpepper	64.41%	14.07%	5.01%
Fauquier	61.01%	12.36%	3.51%

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Indicator/Division	5A. Students included in regular classroom 80% or more of the day	5B. Students included in regular classroom less than 40% of the day	5C. Students served in separate public or private school, residential, home-based or hospital facility
Frederick	68.70%	10.59%	3.03%
Rockingham	71.51%	12.22%	5.49%
Suffolk	74.62%	9.68%	2.68%
York	**66.74%**	**11.29%**	**3.19%**
State Average	**65.07%**	**10.16%**	**4.32%**

Source. Virginia DOE, 2017-18 Division Special Education Performance Reports.

Observation 20: Special education students in the Public Day School setting are spending more time in the general education classroom with their non-disabled peers.

While *Observation X* shows that YCSD did not meet State targets for Indicator 5: School Age LRE *across all placement settings*, the review team further analyzed the percent of time students in the Public Day School placement setting spend with their non-disabled peers, which is captured in the Regular Class Time Percent field in the student-level data provided to Gibson for this review. Figure 4.9 shows the percent of students by Regular Class Time Percent category (i.e., <40%, 40-79%, and At Least 80%) over a 5-year period. As illustrated in this chart, the percent of students in each category has fluctuated over this time period; however, there has been a notable shift to serving special education students in more inclusive settings from 2017 to 2019. Since student-level data are not reported publicly on the Virginia DOE website, the review team was unable to compare these percentages to other school divisions.

Figure 4.9. Students in Public Day School (Ages 6-22) by Regular Class Time Percent Category, 2015 to 2019
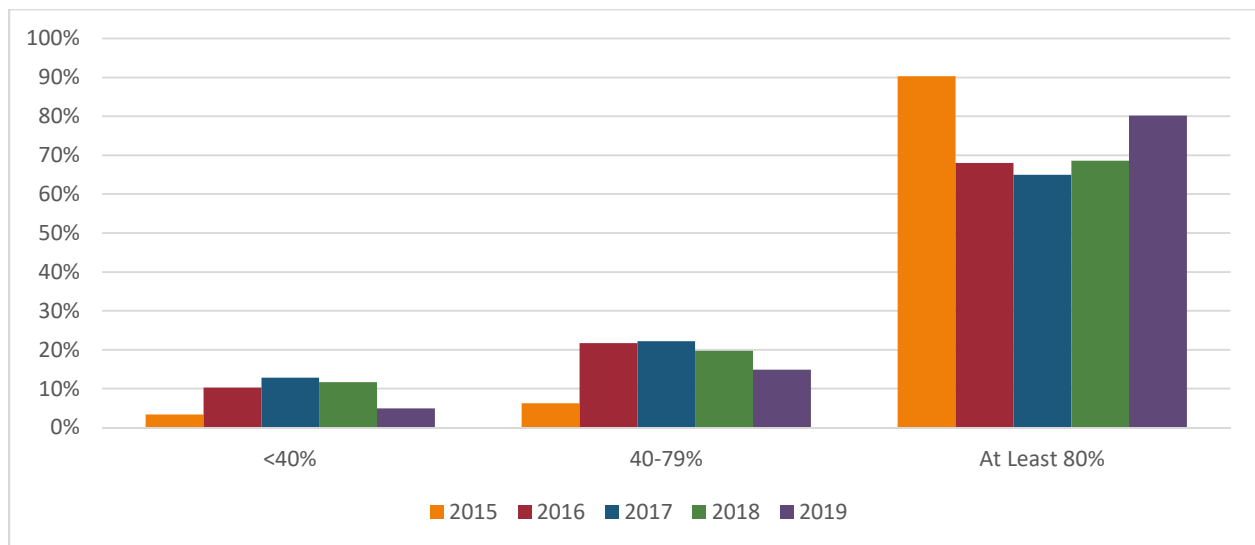
Source. YCSD Combined Student Data 2015-2019_MOY.xlxs.

Figure 4.10 shows the percent of students by Regular Class Time Percent category and primary disability for 2019. Most of the students in the more restrictive settings (i.e., less than 40%) have a primary disability of AUT, ID, MD, and OHI.

Figure 4.10. Students in Public Day School (Ages 6-22) Regular Class Time Percent by Disability, 2019

	TBI	MD	ID	OI	DD	AUT	ED	OHI	HI	SLD	SLI	VI
<40%		13	14			21	2	8		3	3	
40-79%	2		11	1	6	34	10	66	2	60		
At Least 80%	1	10	27	2	13	140	41	302	9	310	175	4
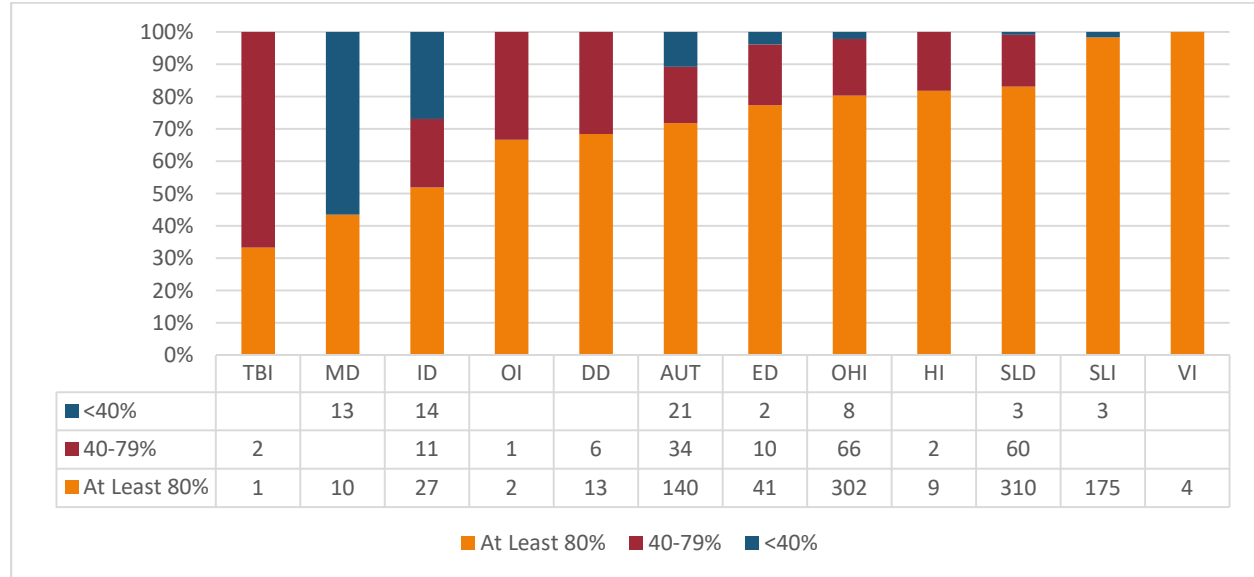
Source. YCSD Combined Student Data 2015-2019_MOY.xlxs.

As shown in Figure 4.11, further analysis of data shows that the shift to more inclusive settings was demonstrated in almost every disability type, most notably students with intellectual disabilities (ID). For example, the number of students with ID decreased 8.8 percent (5 students) from 2017 to 2019 yet the percent of students in the Regular Class Time Percent category of At Least 80 percent increased by 44.9 percent. This indicates that there has been a significant shift in the service delivery model for many students with ID and that more students are being served in the general education classroom. Importantly, not only is this pattern mirrored for other disability types, it is magnified in the sense that some of these student subgroups represent a larger percentage of the student population, so the impact on general education teachers has likely been significant since there are more high-need students in their classrooms. This is discussed further in the *Instructional Practices* section of this chapter.

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Figure 4.11. Students in Public Day School (Ages 6-22) – Percent Change in Number Students by Regular Class Time Percent and Disability, 2017 to 2019
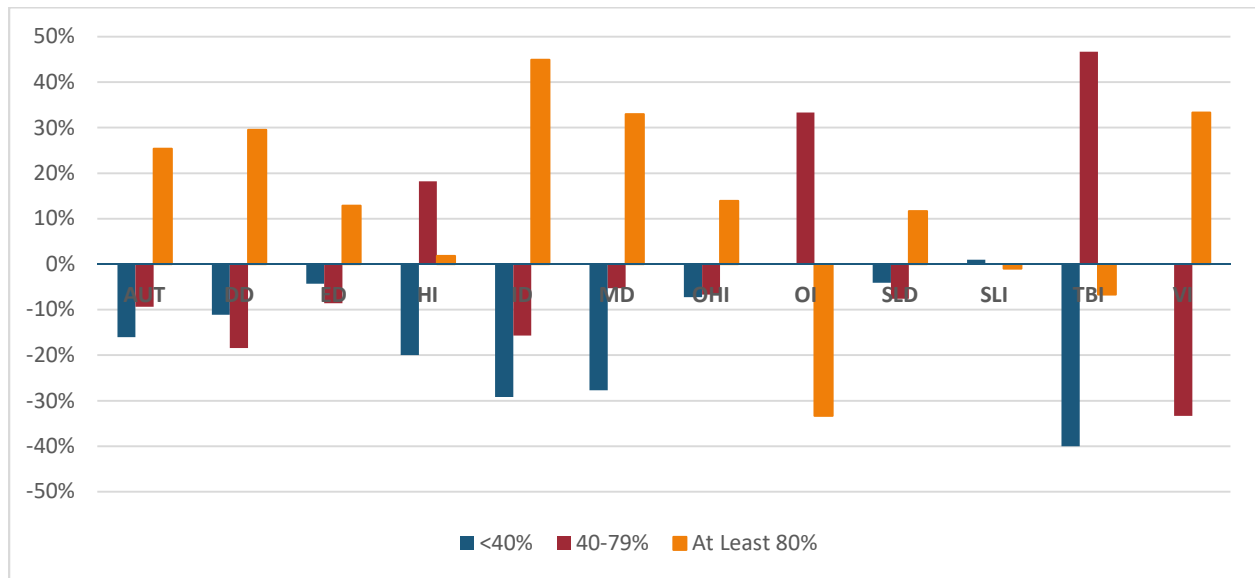
Source. YCSD Combined Student Data 2015-2019_MOY.xlxs.

The review team further analyzed the change in the Regular Class Time Percent for the different disability categories from 2017 to 2019 for different disabilities. For example, there are 33 students with ID that were active in both 2017 and 2019. Figure 4.12 illustrates the change in the in their Regular Class Time Percent over this 3-year period for each student with ID: 5 students experienced a decrease in their Regular Class Percent, 4 students experienced no change, and 24 students experienced an increase in their Regular Class Percent (and a significant increase for many). To illustrate, the student highlighted in blue in Figure 4.12 had a Regular Class Time Percent of 13 percent in 2017 and a Regular Class Time Percent of 100 percent in 2019, and therefore a differential of 87 percent in the amount of time spent with non-disabled peers. See also related *Observation X* regarding data integrity in *Chapter 3 – Program Organization and Management*.

Figure 4.12. Students in Public Day School (Ages 6-22) – Percent Change in the Regular Class Time Percent from 2017 to 2019 for Students with ID
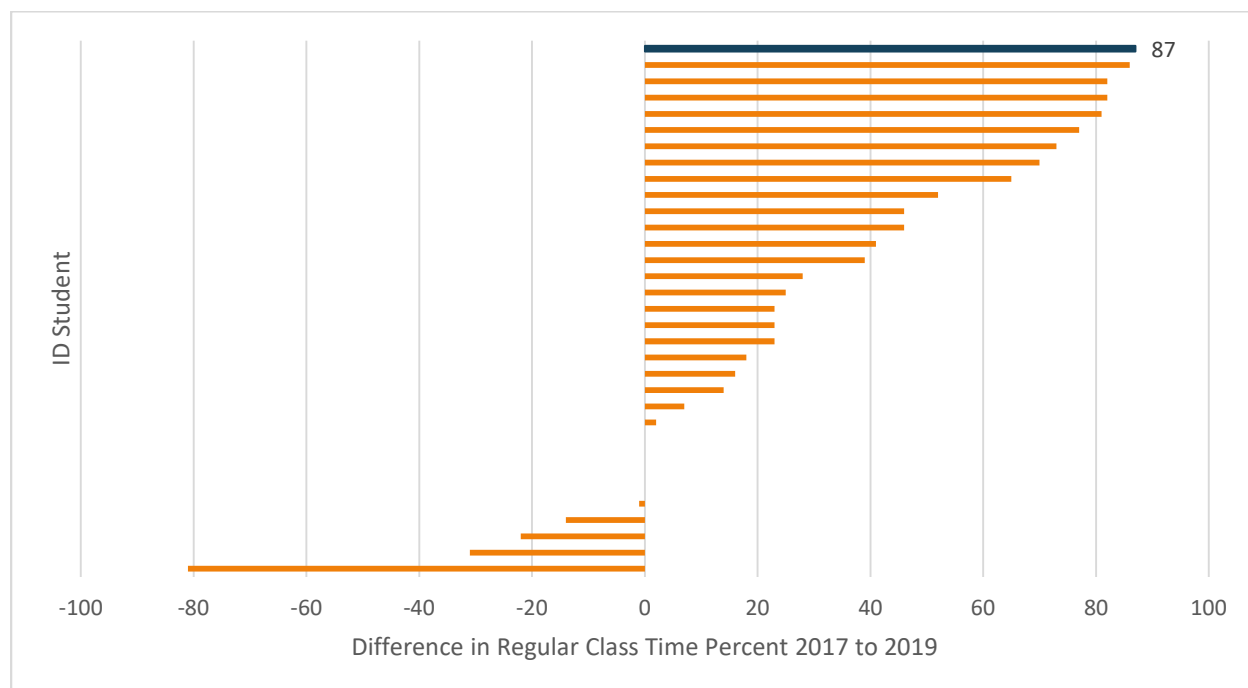
Source. YCSD Combined Student Data 2015-2019_MOY.xlxs.

Public Separate School, Private Day School, Private Residential, and Homebound Placement (Ages 6-22)

Students with disabilities may be placed in a separate school or facility *"only when the nature and severity of the disability of a child is such that education in the regular classes with the use of supplementary aids and services cannot be achieved satisfactorily."*[12] Like many other school divisions in Virginia, YCSD contracts with a regional education service center, the New Horizons Regional Education Center (NHREC), to provide specialized programs and services to students with disabilities whose individual needs cannot be met within the school division. Students placed in one of the NHREC programs typically have emotional disabilities and exhibit aggressive behaviors and therefore require a structured and supportive learning environment. According to division staff, the goal is to transition these students back to YCSD as soon possible (most often to the BSP). Similarly, a small number of students in YCSD are privately placed in a State-licensed private school for students with disabilities. Students in a homebound setting receive their instructional services from itinerant special education teachers; related services are provided by the OSS' related service providers in accordance with the student's IEP. YCSD only had 1 student placed in a Private Residential Setting in the past five years (2016 to 2018).

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[12] IDEA 20 U.S.C. '1412(a)(5)(A)

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Observation 21: Most students placed in separate settings are secondary students with AUT and ED.

In 2019, students in Public Separate Schools, Private Day Schools, Private Residential, and Homebound settings represent approximately 3 percent of YCSD's special education student population, which is a 0.7 percent decrease from 2015. Figure 4.13 shows the total number of students each year in these settings by primary disability; AUT and ED students account for the majority of students served in separate settings.

Figure 4.13. Number of Students in Public Separate School, Private Day School, Private Residential, and Homebound Placement by Disability, 2015 to 2019
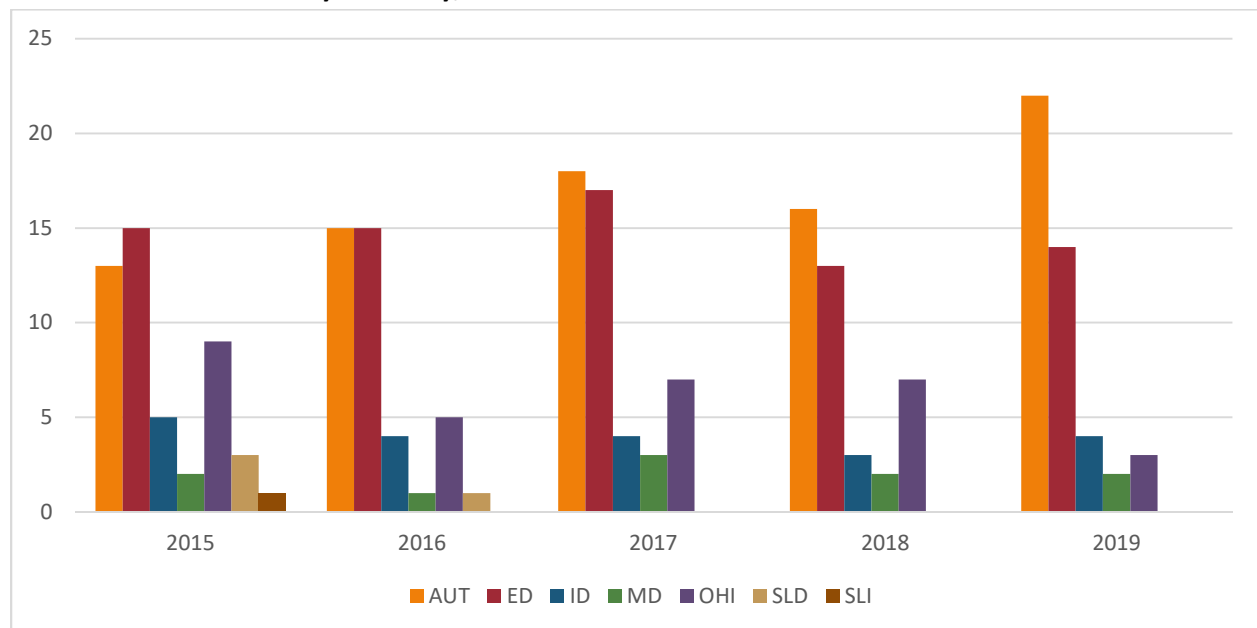
Source. YCSD Combined Student Data 2015-2019_MOY.xlxs.

Figure 4.14 shows the number of students by school level served in separate settings.

Figure 4.14. Number of Students in Public Separate School, Private Day School, Private Residential, and Homebound Placement by School Level, 2015 to 2019
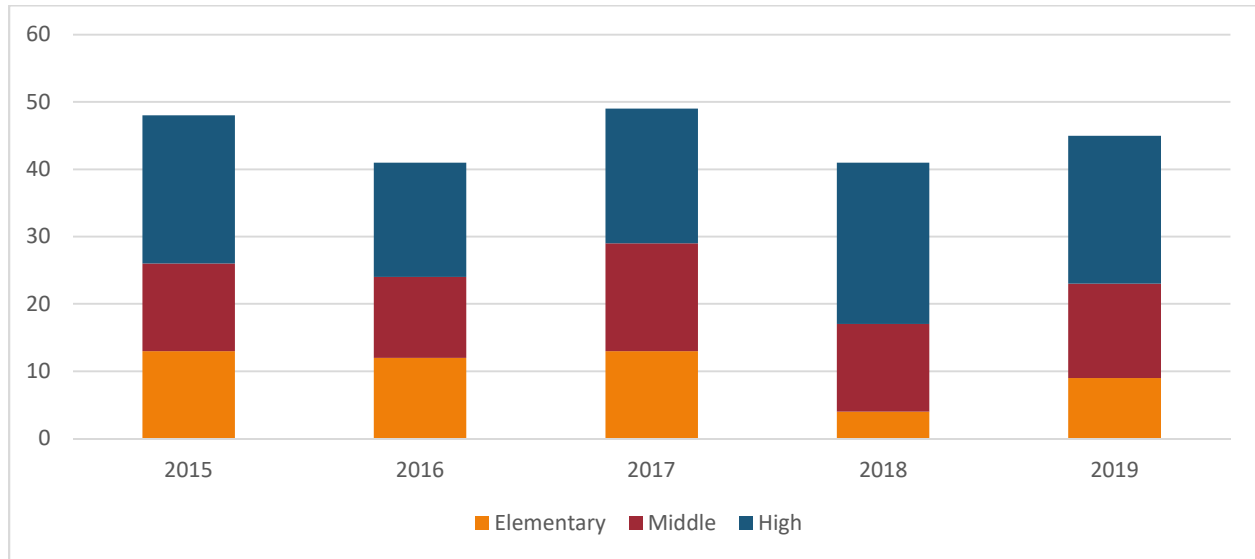
Source. YCSD Combined Student Data 2015-2019_MOY.xlxs.

Observation 22: Staff had low rates of agreement with respect to the consistency with which student placements are made.

The review team also surveyed staff regarding their perceptions on student placements. Ninety-five percent of staff agree that "Students with disabilities are placed in settings with their nondisabled peers to the greatest extent possible." However, 59.5 percent of staff agreed that "Placement decisions are made consistently across IEP teams and schools", and this perception varied significantly across and within school types (see Figure 4.15).

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Figure 4.15. Staff Survey Responses – Student Placement, Agreement by School

Placement decisions are made consistently across IEP teams and schools.
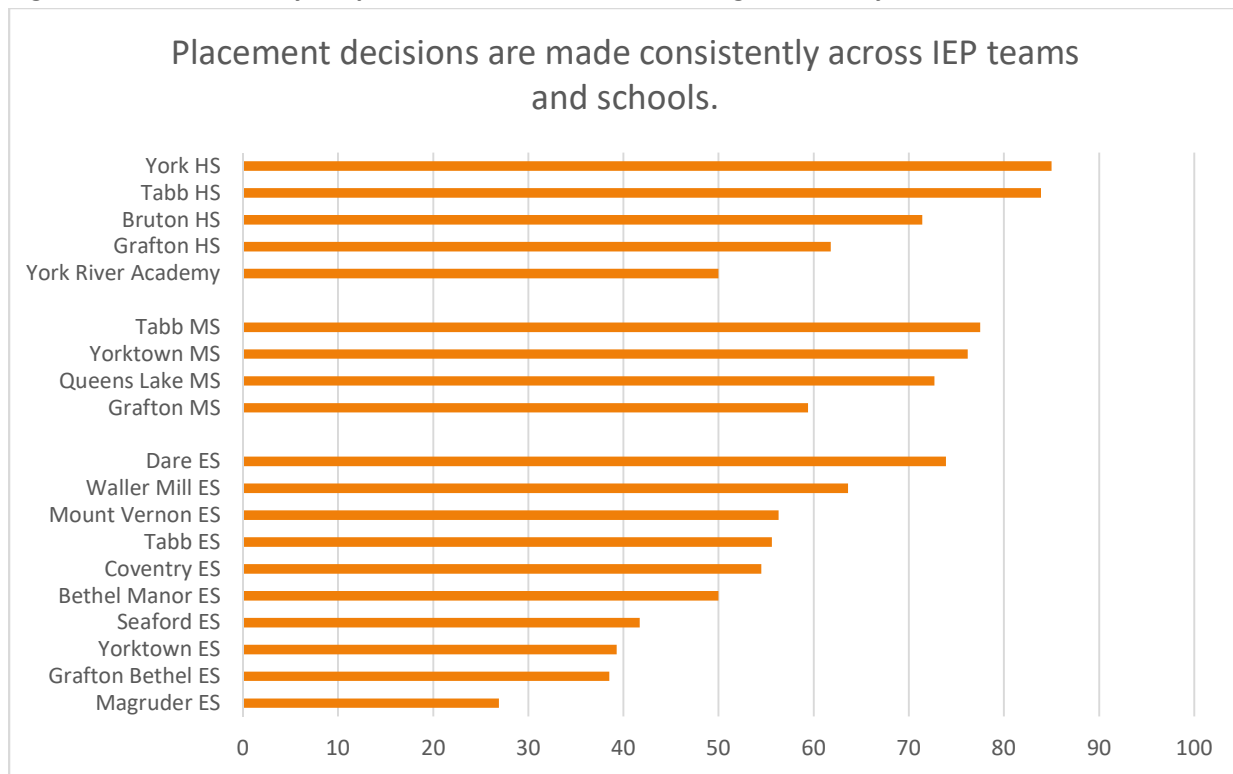
Source. Gibson's Staff Survey (Q21_5).

In a separate but related survey item, 43.5 percent of elementary school staff, 40 percent of middle school staff, and 30.6 percent of high school staff agreed that "most of our services for students with disabilities are selected on the basis of program names and/or disabilities labels rather than individual student needs."

Responses also varied significantly by role, with the SBO/school administrators least likely to agree to the statement that "Placement decisions are made consistently across IEP teams and schools" (see Figure 4.16).

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Figure 4.16. Staff Survey Responses – Placement Decisions, Agreement by Position Type

Placement decisions are made consistently across IEP teams and schools.

Position Type	Agreement %
SBO/Campus Admin.	32.1
Licensed SpEd Service Provider	35.7
Certified SpEd Teacher	45.2
Gen Ed Teacher	70.4
SpEd Para-educator	56.3
Other Staff	74.5
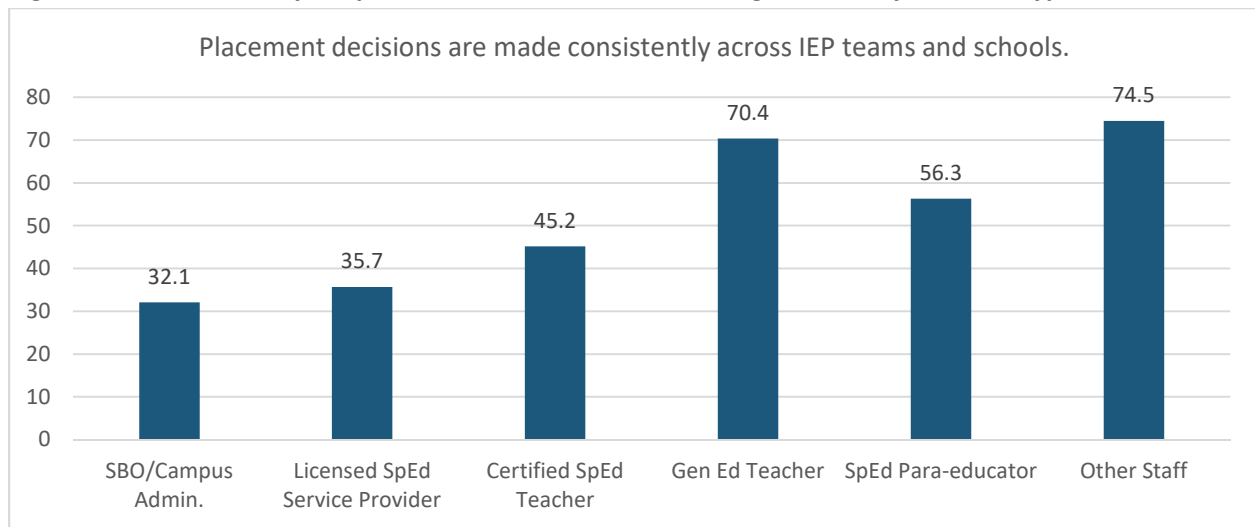
Source. Gibson's Staff Survey (Q21_5).

When asked about the process for communicating placement decisions, there were higher rates of agreement with respect to communicating to parents than teachers and staff (see Figure 4.17 below).

Figure 4.17. Staff Survey Responses – Placement Decisions - Agreement by Position Type
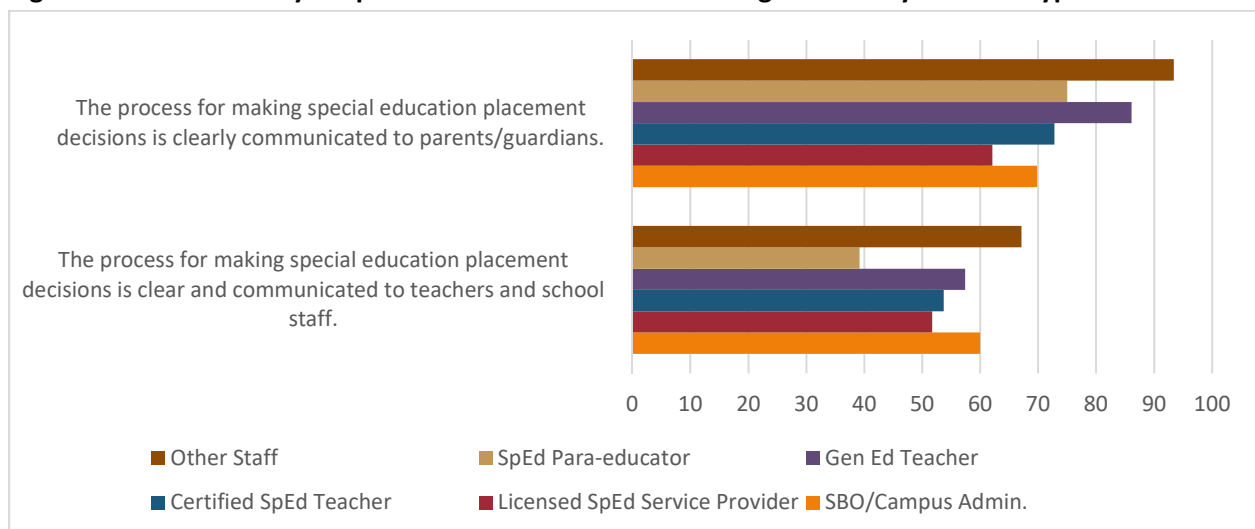
Source. Gibson's Staff Survey (Q21_1, Q21_4).

Observation 23: Elementary school staff expressed concerns about the limited array of service options for students with disabilities, particularly those with moderate academic and/or behavioral needs.

Overall, 80.7 percent of staff agree that YCSD provides quality services to students with disabilities and 78.8 percent of staff agree that students with disabilities have adequate access to appropriate instruction and learning opportunities. However, staff at elementary schools had the lowest rates of agreement with these statements (see Figure 4.18).

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Figure 4.18. Staff Survey Responses – Continuum of Services, Agreement by School Level
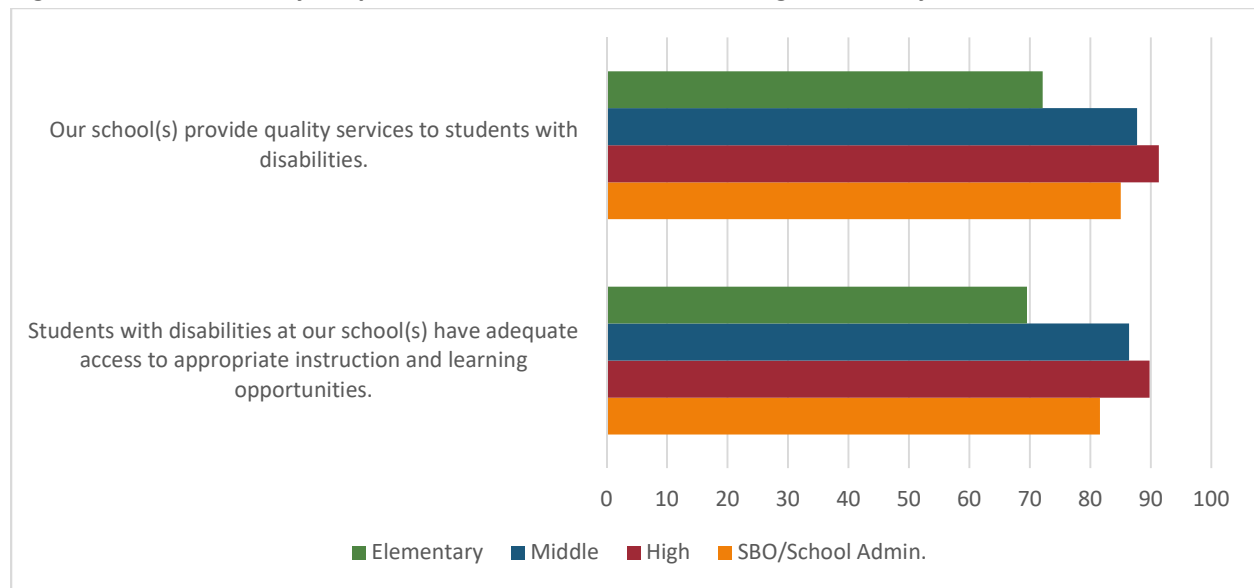
Source. Gibson's Staff Survey (Q12_15, Q12_1, Q9, Q12_7).

During the course of this review, several staff in interviews and focus groups expressed views about a lack of continuum for some students, particularly those with moderate academic and/or behavioral needs. On staff survey responses, elementary school staff again had the lowest rates of agreement when asked about YCSD's continuum of services for students with disabilities (see Figure 4.19).

Figure 4.19. Staff Survey Responses – Continuum of Services, Agreement by School Level
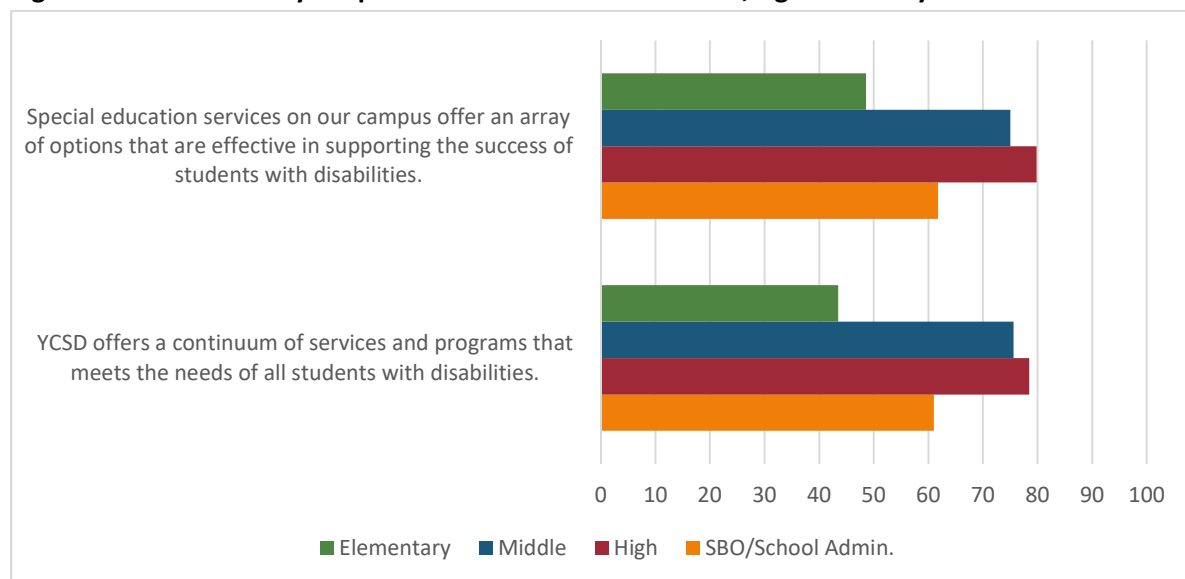
Source. Gibson's Staff Survey (Q12_18, Q21_2).

Recommendation 14: Provide additional guidance and training to IEP teams regarding student placements, and continually evaluate YCSD's continuum of program and services to ensure the needs of all students are being met.

Although YCSD offers an array of programs and services to educate students with disabilities, the needs of students are ever-changing and innovations in program design and system approaches must continually be evaluated. The analysis above, and feedback from staff and parents, points to the need to improve YCSD's continuum of services in several important ways:

- Finalize the OSS' Special Education Policy and Procedures Manual (see also *Recommendation X* in *Chapter 3 – Program Organization and Management*) to include guidance for placement decisions. The Director of Student Services should include various stakeholders in this process, such as the coordinators, assistant principals, evaluation team members, and general and special education teachers. This will help to ensure that the format and content is relevant for all intended users. Revisit these guidelines annually and make adjustments as needed.

- Provide on-going training to all stakeholders involved in the student placement process (e.g., principals, assistant principals, general education teachers, evaluation team members, and ACCs/ACIs). Ensure that all professional learning aligns to the guidance provided in the Special Education Standard Operating Procedures.

- Assess the current continuum of programs and services to ensure grouping is organized according to instructional level.

- Provide opportunities for administrators, educators, parents and other community members to provide input on the Division's continuum of services and inclusion model. Incorporating stakeholder input is essential before making any necessary adjustments and improvements to YCSD's programs. YCSD should consider annual surveys and/or "listening tours" to hear first-hand from the various stakeholder groups.

- Promote a "student first" framework to provide a more thoughtful means of determining the best support for student learning. When making decisions about placement, the "student first" concept places the first priority on the extent to which a student with disabilities can make academic and/or social progress in the general education classroom with support. This is contrary to a "place" mindset that gives first priority to determining the location where education should occur based on the student's limitations.

- Develop strategies to increase participation of non-disabled students in YCSD's early childhood programs. Although data indicate that YCSD has met State targets for educating students ages 3 to 5 in the LRE, analysis of more current data show a trend towards placing students in more restrictive settings (i.e., self-contained classrooms). This is not positive since data also show that YCSD is not meeting State targets with respect to the percent of students that are not functioning within expectations. For example, YCSD should create easy-to-read materials on the benefits of preschool inclusion programs for all students and designate some high-quality inclusion classrooms as model classrooms and encourage parents of non-disabled students to visit. All young children with disabilities should have access to inclusive, high-quality early childhood programs.

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- Select and implement a social skills curriculum for student's ages 6 to 22 with emotional and/or behavioral needs. A defining characteristic of these students is their inability to build and sustain positive relationships. A sound social skills training (SST) program will teach new or replacement social skills in the same way academic skills are taught, directly and actively. A meta-analysis of 43 studies of social skills training found that this type of training produced significant improvements in children's levels of social interaction, sociometric status and cognitive problem-solving abilities (see also *Recommendation X* below).[13]

- Evaluate whether some students served in separate schools and facilities could be transitioned back to YCSD. Given the highly restrictive nature and cost of these placements, YCSD must continually evaluate the appropriateness of these settings for individual students. YCSD must ensure that IEP teams document a student's lack of progress prior to recommending a placement in a separate setting. The Division should also ensure that case managers monitor progress of students frequently to ensure that a student's placement in a separate setting is appropriate and that the student is making sufficient progress toward mastering IEP goals.

Instructional Practices/Models of Instruction

As part of this review, Gibson conducted 30 classroom observations across two elementary schools, two middle schools, and two high schools (see *Appendix D – Classroom Observation Protocol*). During classroom observations, the review team was able to observe the model of instruction (e.g., teacher-directed, small group, independent learning, co-teach), levels of student engagement, availability and quality of teacher lesson plans, availability of classroom resources and materials, and the use of technology resources to support differentiated learning.

Observation 24: Several schools are not demonstrating effective inclusionary practices in the general education setting.

The review team observed some high-quality instructional practices taking place during classroom observations, but there were several notable patterns that indicate that schools are not implementing inclusionary practices effectively. These are described further below.

General education classrooms comprise a high percentage of high-need students. Students with disabilities comprised more than 30 percent of students in some classrooms. In one school visited, teachers reported their ratios as: 11 of 20 students, 12 of 22 students, 11 of 26 students. Anecdotally, the review team learned that students with 504 plans and English language learners were also clustered in these classrooms. Some school-based staff reported that they struggle to provide the minutes of service required in the IEP, which could explain why schools choose to schedule a high number of students with disabilities in one classroom. It is important to note that Virginia Regulation 8VAC20-81-40 specifies that

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[13] Philip Erwin, Counselling Psychology Quarterly, "Effectiveness of social skills training with children: a meta-analytic study, Sept. 27, 2007, https://www.tandfonline.com/doi/abs/10.1080/09515079408254154.

"no more than 14 children shall be assigned to a single class period if there are similar achievement levels and one subject area and level are taught, and no more than 10 students shall be assigned to a single class period when there are varying achievement levels". Some schools reported developing the master schedule prior to scheduling students with disabilities, which is not best practice.

Whole group instruction was the instructional method utilized in most classrooms. In classrooms visited, 28 percent at elementary, 33 percent at middle, and 44 percent at high schools utilized whole group instruction. This is significant because students with disabilities are at very different levels and require individualized instruction which can best be delivered using individual, small group, or collaborative groupings rather than whole group instruction.

There was a limited use of instructional technology to differentiate instruction. Although technology devices were available in most classrooms, students were using them in only 10 of the 30 classrooms observed. Staff shared in interviews that digital content is available such as DreamBox, ReadWorks, ReadTheory, IXL, Prodigy, Vmath, Splash Math, MobyMax, and Reading Out Loud, but its use is inconsistent across the Division. Best practice supports blended learning practices to individualize instruction for all students.

The practice of "isolated inclusion", or segregating students with disabilities in an area of the classroom apart from their non-disabled peers, was observed in several co-teach classrooms. Only 2 of 7 co-teach classrooms observed by the review team demonstrated shared teaching. While there are certainly pockets of excellence, more often than not, the review team observed the general education teacher providing direct instruction at the front of the class and the special education teacher providing direct instruction to a small group of students with disabilities in the back of the class. This practice is not an authentic assimilation of students with disabilities into general education classroom and does not meet the intent of LRE and the spirit of inclusion.

Shared teaching was not observed in most co-teach classrooms. Co-teach is a research-based service delivery model where certified general education and special education teachers work together to meet the needs of all students in the general education classroom. Both teachers share responsibility for lesson planning, delivery of instruction, and progress monitoring for all students in the classroom. The co-teach model of instruction, if implemented with fidelity, can be effective in improving overall student performance because it draws on the strengths of the general education teacher, who has expertise in the school system's curriculum, standards, and pacing, as well as the strengths of the special education teacher, who has expertise in identifying the unique learning needs of individual students and enhance curriculum and instruction to match those needs.

While it is evident that the practice of co-teaching exists across YCSD (most schools report that they have some co-teach classrooms), there is not a division-wide strategy with expectations and support to ensure that this instructional model is implemented well. As a result, the fidelity of implementation appears to vary widely across the school division. Feedback from schools administrators and teachers during focus groups suggests that successful implementation of co-teach is dependent on principal support for the initiative, the willingness and desire of teachers to collaborate, and a master schedule that enables

collaborative planning time for general and special education teachers. With the exception of staff involved with the co-teach pilot (2Teach LLC) at middle schools, teachers and administrators also reported that they have not received sufficient on-gong professional development related to co-teach.

Survey feedback related to the co-teach model of instruction also seems to support the review team's classroom observations (see Figure 4.20). For example, more than 90 percent of general education and special education teachers agree that it is the general education teacher that is primarily responsible for lesson planning and instruction, which is not indicative of a high-functioning co-teach teacher team.

Figure 4.20. Staff Survey Responses – Co-Teach
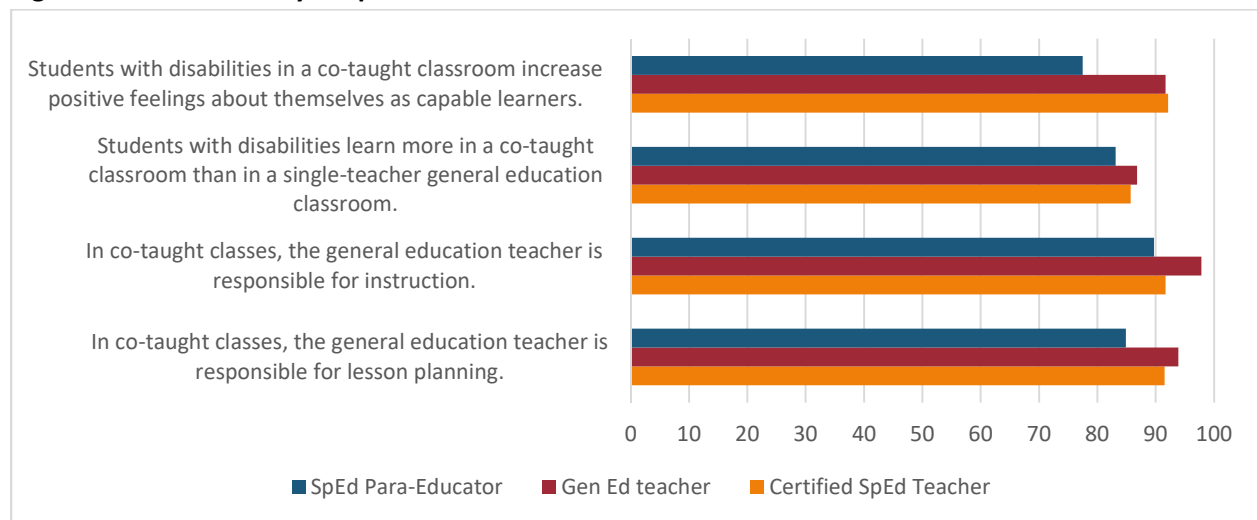
Source. Gibson's Staff Survey (Q19_1, Q19_2, Q19_8, Q19_9).

Observation 25: YCSD staff, particularly those at elementary schools, expressed concerns about teachers' abilities to meet the diverse needs of learners in their classrooms.

When asked about the adequacy of resources and supports to meet the diverse needs of students with disabilities, only 3 elementary schools had more than 50 percent of staff agree with these statements (see Figure 4.21). Across all school levels, 71.7 percent of SBO/school administrators agree that teachers have the resources and supports they need diverse learners, compared to just 53.4 percent of general education teachers, 51.6 percent of special education teachers, and 57.1 percent of para-educators.

Figure 4.21. Staff Survey Responses – Teacher Resources (Elementary Schools), Agreement
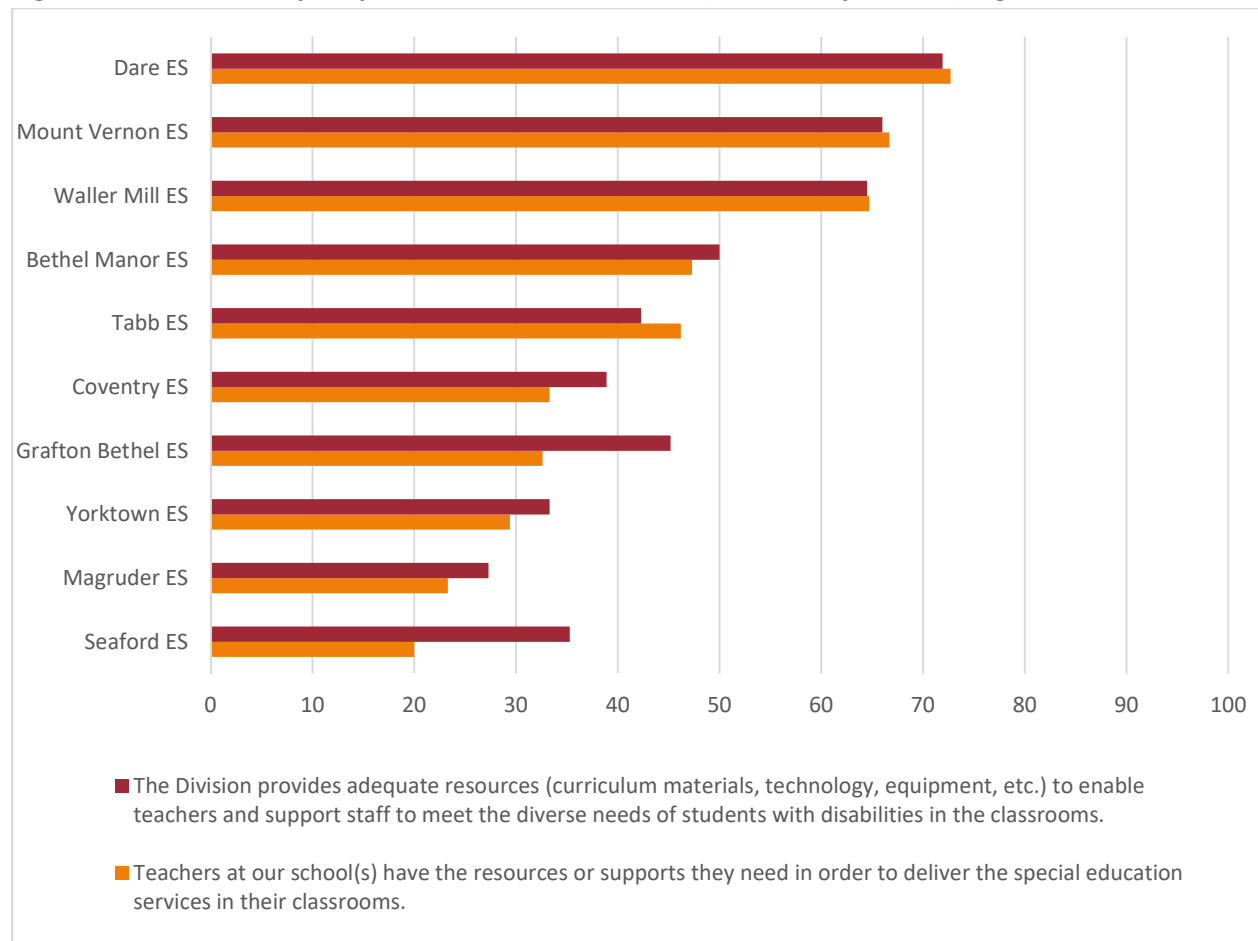
Source. Gibson's Staff Survey (Q12_2, Q12_3).

In focus groups, many elementary general education teachers expressed that they feel challenged to meet the individual needs of some students with low-incidence disabilities, partly due to the fact that many high-need students are clustered in their classrooms. When polled, elementary teachers estimated that between 26 percent and 33 percent of their students have an IEP, and the percentage of high-need students is even greater if students with 504 Plans are included. They also shared that the support provided by special educators is inconsistent, as special education staff are often called away for other duties. This sentiment appears to be supported by the fact that while 60.2 percent of all survey respondents agreed that "special education support personnel (e.g., special education program coordinators or service providers) are available to spend enough time in general education classrooms providing support for students with disabilities and their instructors", only 46.8 percent of elementary school staff and just 29.2 percent of middle school staff agreed with this statement.

Recommendation 15: Provide schools with a model for supporting instruction and inclusion in the general education setting.

Federal law[14] requires that students with disabilities be educated along with non-disabled students to the maximum extent appropriate to the needs of the students with disabilities. This means that students with disabilities must be included in general education classes if the students' needs can be met there. And while YCSD had not met State targets for Indicator 5: School Age LRE, the above analysis illustrates that there has been a recent shift in the percent of time students with disabilities spend with their non-disabled peers. With that said, it is important to emphasize that the goal of inclusion is not to simply place all students in the general education classroom; teachers and para-educators must have the resources and supports they need to meet the needs of diverse learners in their classrooms and so students with disabilities can be successful in an inclusive environment. To better support schools in this endeavor, the review team recommends that the OSS:

- Develop standard operating procedures and written guidelines on inclusive practices that establish expectations and provide direction to all staff, including new teachers.

- Collaborate with the Department of Instruction to develop a protocol for learning walks that encompasses evidenced-based inclusion practices.

- Identify schools/classrooms with successful inclusionary practices that can serve as models for other schools/teachers who would benefit from observing their peers.

- Provide on-going professional development to both general and special education teachers and para-educators on inclusive practices. The recommended shift in Coordinators of Student Services responsibilities (described in *Chapter 3 – Program Organization and Management*) will enable these positions to allocate more of their time leading effective staff development and training regarding the appropriate modifications and/or accommodations for students in inclusion settings.

- Help schools develop supportive structures, such as common planning time, to facilitate effective co-teaching teams. A co-teach instructional model is costly to implement because it requires two teachers in a classroom instead of one. If co-teach is a priority initiative for YCSD, then schools and co-teach partnerships will need to be supported with the staffing resources and on-going professional development to ensure that the model is implemented with fidelity. YCSD should also plan to formally evaluate this initiative, as quantifying the outcomes of co-teach is essential to determining the quality of implementation and the efficacy of the model in YCSD. Of note, management reported to the review team that they intend to form a workgroup to analyze the current state of co-teaching in YCSD and plan for training in fiscal year 2021 at the elementary and secondary level.

- Provide more support to schools when developing their master schedules to better support inclusion while using existing staff resources. As an example, elementary schools could begin the

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[14] 34 CFR 300.115.

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staff assignment process by grouping students within a school based on level (reading, math, and/or social skills acquisition). Existing staff can be assigned to support students at different instructional levels rather than grade. An example of this method would be a teacher being assigned to serve all students on a grade 3 reading level, some of whom are included in grade 3 general education reading, some who are two grade levels behind and need specialized instruction in a pull-out setting, and others who may be in a self-contained classroom. Grouping staff in this manner enables students to receive instruction in the setting best suited for their instructional level. As students progress, they can be regrouped based on their individual needs. Flexibly grouping and regrouping students based on progress is important to ensure acceleration of learning is occurring.

- Set expectations for use of digital devices and provide professional development to support the use of digital teaching and learning in order to differentiate and personalize learning for students with disabilities.

- Ensure that lesson plans specify how instructional technology and software will be utilized for each unit of instruction.

Observation 26: There are limited professional development opportunities for general education teachers related to inclusion and/or behavior.

With a push toward more inclusion, the need for general education teachers to receive adequate professional development training related to special education students is critical to the success of the inclusion model. It is not uncommon that many general education teachers feel ill prepared to meet the needs of students with disabilities in their classroom. In focus groups with the review team, general education teachers expressed that they desire more division-wide professional development and training to better support students with disabilities in their classrooms. This issue is compounded by the fact that many teachers reported during interviews a high number of students with disabilities and 504 plans in their classrooms, sometimes comprising more than 50 percent of students in the class.

Overall, 79.5 percent of staff agree that Division and school leaders provide professional growth opportunities, and 67.6 percent of staff agree that they are provided information on up-to-date instructional and behavioral techniques. Agreement with these and other statements related to professional development varied by employee groups, as shown in Figure 4.22.

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Figure 4.22. Staff Survey Responses – Professional Development, Agreement
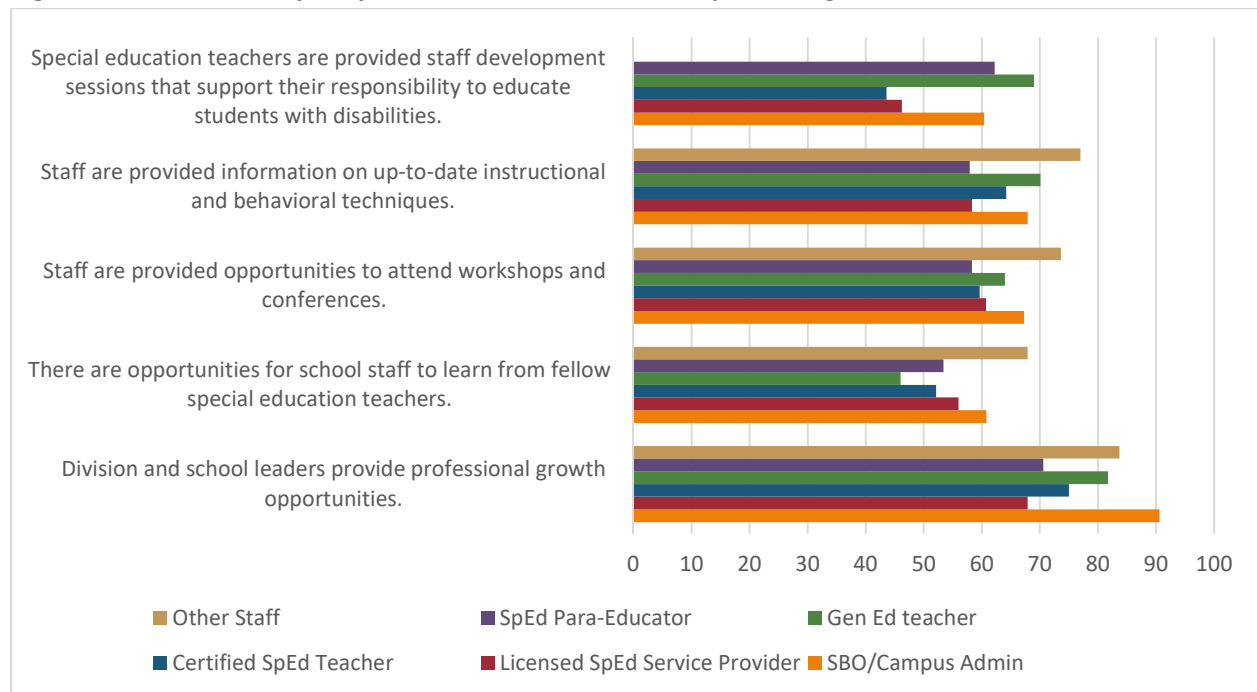
Source. Gibson's Staff Survey (Q27_5, Q27_6, Q27_7, Q27_9, Q27_12).

YCSD does not have a learning management system (LMS) to manage training and professional development activities; for this reason, the review team was unable to analyze and quantify the professional development opportunities and participation rates available to general education teachers related to special education instruction and/or behavior. However, management reports that the following training programs are offered to general education teachers: VCU-ACE training (on-line courses and Evidenced Based Practices Academy available to all teachers, school counselors, and related service providers), structured literacy training (available to reading specialists, special education teachers, and SLPs), co-teach professional development (as part of the middle school co-teach initiative described previously), and New Teacher Orientation (reviews the special education process, IEP at a glance, secondary transition, and behavior strategies).

Recommendation 16: Provide more job-embedded and differentiated professional development opportunities for both general education and special education teachers so they can better meet the needs of students with disabilities in their classrooms.

YCSD's commitment to inclusion means that a wide range of needs will exist in the general education classroom. For this reason, it is imperative that both general education and special education teachers are equipped with training and resources to meet the individualized needs of these students. YCSD should review the professional learning opportunities currently available to staff and determine if additional offerings related to inclusive instruction are needed. Implementation of a division-wide learning management system (LMS) would help YCSD to not only expand on-line training opportunities but also better track participation. While formal training is important for increasing teacher's knowledge about

effective practices, teachers need access to job-embedded coaching to improve their ability to implement learned skills. As described in *Chapter 3 – Organization and Management*, coaching support should be provided by the Student Services Coordinators (or Instructional Specialist) position and/or Special Education Lead Teachers.

In addition to formal training activities and job-embedded supports, below are some suggestions to provide both teachers and para-educators with more flexible, innovative, and personalized professional development based on their individual learning needs:

- *EDCamps* – sessions are determined on the day of the event, anyone who attends can be a presenter, and participants select sessions based on their needs.

- *Ignite sessions* – teachers have 5 minutes and can use no more than 20 slides to share a practice at faculty meetings.

- *Twitter chats* – a scheduled, organized topical conversation on Twitter centralized around a specific hashtag.

- *Micro-credentials* – mini-degrees or certifications in a specific topic area.

- *Personalized learning playlist*s – a series of activities such as articles to read, lessons to design, or videos to view focused on specific content.

- *Massive open online courses* – on-line courses aimed at unlimited participation and open access via the Internet.

- *Gamification* – the process of using game mechanics and game design elements in non-video game environments to better engage employees and create an experience that is more interesting to them.

The benefit of using these types of flexible, personalized learning is that most have no costs associated. Additionally, staff will enjoy participating in professional learning at a time convenient for them and on topics that are relevant to their needs.

Student Behavior and Discipline

Research indicates that when education is disrupted by long absences (such as suspension or expulsion), the probability of a student dropping out of school increases dramatically; and, children with special needs that drop out are much more likely to never complete a diploma and remain unemployed and economically dependent.

Observation 27: YCSD did not meet the State targets for Indicator 4: Suspension/Expulsion, which tracks the disproportionate representation of students with disabilities as it relates to disciplinary practices.

In 2017, YCSD did not meet the State's target for Indicators 4A (special education students are at a higher risk of being suspended or expelled for greater than 10 days in a school year when compared with non-special education peers), or 4B (special education students, based on a specific race and ethnicity, are at

a higher risk of being suspended or expelled for greater than 10 days compared to their special education peers in all other racial groups). YCSD's risk ratio (computed by VDOE using annual discipline/crime and violence submission data) for Indicator 4A was 5.06 and YCSD's risk ratio for Indicator 4B was 3.38 for Black students.[15] Both of these risk ratios constitute a significant disproportionality according to VDOE (i.e., greater than or equal to 2.0). YCSD is not uniquely challenged in this area – 46.3 percent of Virginia school divisions did not meet state targets for Indicator 4A and 9.9 percent did not meet state targets for Indicator 4B.[16]

The Division has shown substantial improvement in Risk Ratio 4A in recent years. Figure 4.23 presents historical trends in Risk Ratios 4A and 4B since 2013-14, reflecting a reduction of 63 percent in Risk Ratio 4A since 2013-14. Virginia only reports Risk Ratio 4B if the ratio is greater than 1; YCSD

Figure 4.23. YCSD Risk Ratios 4A and 4B, 2013-14 to 2018-19
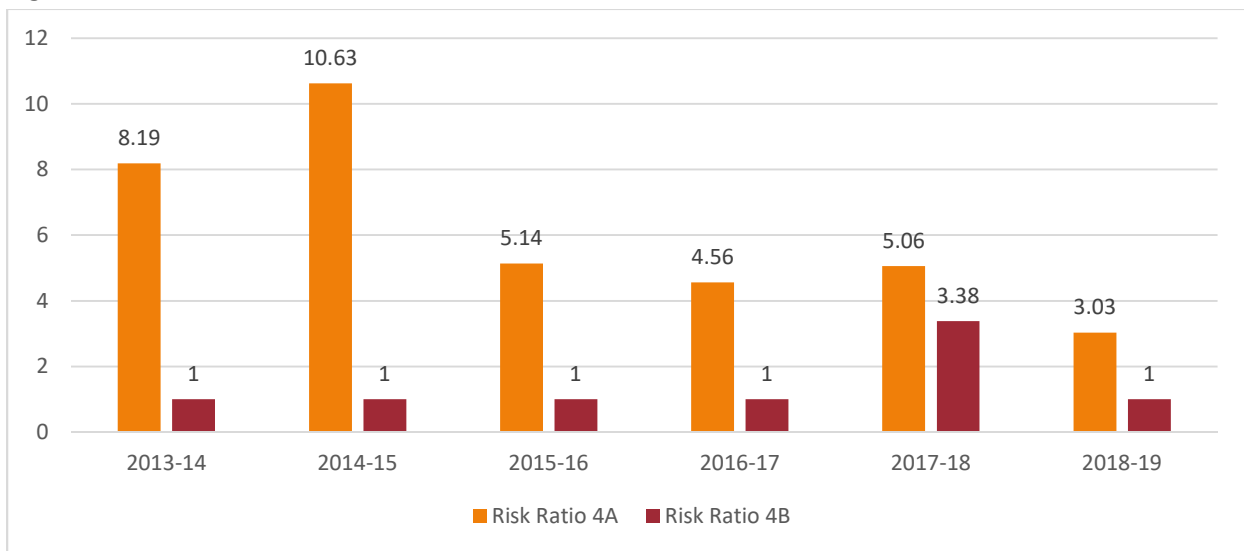
Source. YCSD Indicator 4.xls.

To address this area of non-compliance, YCSD has included in its Strategic Plan (Goal 4 – School Culture) the objective that *"staff will implement programs and protocols to reduce behavior referrals and out-of-school suspensions by FY22, with a focus on reducing exclusionary practices and disproportionality."* YCSD is implementing the following programs and protocols to accomplish this objective:

▪ School-Wide Information System (SWIS) is a confidential web-based information system to collect, summarize, and use student behavior data for decision-making. Data dashboards allow for analysis of behavior incidents by location, grade level, location, time, type of behavior, etc. The SWIS was piloted on 7 schools in 2017-18 and fully implemented on all schools in 2018-19. The historical lack of a good data collection and management system to monitor and track behavioral incidents appears to be a contributing factor to YCSD's record of non-compliance in

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[15] Letter to YCSD from VDOE Assistant Superintendent Division of Special Education and Student Services, May 21, 2018. See DR #35.
[16] Virginia DOE, 2016-17 Division Performance Reports.

this area. The new SWIS should enable the Division to more effectively monitor behavior referrals and more proactively address areas needing attention.

- Virginia Tiered System of Supports (VTSS) is a comprehensive framework that aligns academics, behavior, and social/emotional wellness. Positive Behavioral Interventions and Supports (PBIS), a nationally-recognized approach to support positive academic and behavioral outcomes for all students, is the behavioral component of the VTSS.[17] The implementation of PBIS at YCSD began in 2019, with a phase-in plan of 8 years. At the time of this review, some schools have implemented PBIS to varying degrees of fidelity and success, while others have not yet begun implementation. According to responses on Gibson's survey (Figure 4.24), 19.4 percent of staff agree that bullying is a problem for students with disabilities (with the higher agreement rates at middle schools), and while 84.4 percent of staff overall agree that PBIS is being implemented on their school, just 65.7 percent of staff agree that students are benefitting from PBIS programs.

Figure 4.24. Staff Survey Responses – Student Behavior, Agreement by School Level
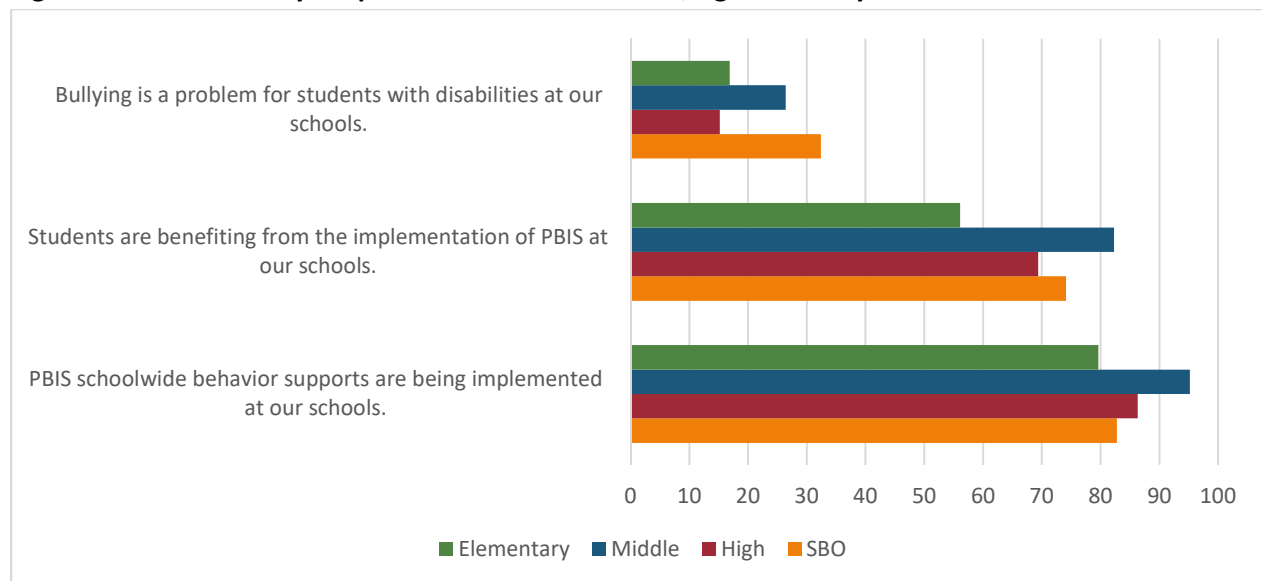
Source. Gibson's Staff Survey (Q21_12, Q21_13, Q23_18).

One of the primary responsibilities of the Behavior Support Specialist (BSS) is to provide coaching and professional development to special education teachers related to behavioral interventions and tiered systems of supports. YCSD received a $20,000 grant award to provide professional development and resources to support implementation of VTSS/PBIS.

Professional development for VTSS/PBIS teams on Tier 1 processes and procedures for discipline, quarterly coaching and support meetings for VTSS/PBIS team leaders, and conferences and leadership training for the Division Leadership Team (DLT). YCSD also provided Tier 2 professional development for intervention staff (e.g., social workers, psychologists, counselors, school resource officers, etc.).

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[17] Virginia DOE website.

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While the above initiatives are encouraging, other observations indicate there is still room for improvement with respect to student behavior and discipline include:

- RtI processes focused on research-based behavior interventions are not implemented with fidelity across the Division. Standard operating procedures for behavior interventions are not well-documented and the Division lacks a centralized system for monitoring interventions (see *Observation X* above).

- Gibson's audit of a sample of student IEPs found that several BIPs did not include documentation on how a student's behavior would be measured and/or progress monitored. Further, there were several students who did not have a BIP but information contained in their IEP strongly suggested that an FBA and BIP were warranted.

- As described previously, YCSD does not centrally monitor or track incidents of restraint and seclusion, limiting management's ability to evaluate whether these techniques are being used appropriately and increasing the risk for possible parent complaints.

Most education research supports early intervention as an effective strategy for reducing social and behavior issues. However, YCSD does not have a behavior inclusion program for students with social and emotional disabilities. While the BSP program provides behavior support to students in a highly structured classroom environment, YCSD does not have a program to address the behavior needs of students in the general education classroom setting. As a result, some students with moderate cognitively impairments and low performing children with Autism many not be getting the behavior supports and social skills they need, particularly at the elementary level.

Recommendation 17: Expand on current efforts to build proactive and responsive behavioral support systems across YCSD.

To address the issue of not meeting State targets and to more comprehensively address student behavior and discipline division-wide, the review team recommends that YCSD:

- Accelerate the implementation of PBIS on all schools so as not to dilute and delay the positive impact of this program. Division leadership must establish and reinforce expectations that PBIS is the standard on every school and in every classroom in order to create an environment for learning that lessons the likelihood that additional behavior interventions will be necessary.

- Ensure that multi-tiered interventions through RtI are consistently implemented for the small percentage of students whose behavior cannot be managed through effective classroom management practices.

- Provide teachers and para-educators with on-going professional development related to classroom management and Tier 1 behavior intervention strategies. Ensure that all teachers receive training in order to employ multiple techniques to engage and motivate students who struggle to manage their own behaviors within general education settings.

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- Utilize data dashboards (through SWIS or other system) to centrally monitor school data related to student restraints and seclusions and manifestation determination reviews. Ensure that all school improvement plans adequately address these indicators. With the implementation of SWIS, the SBO must ensure that schools are carefully monitoring student discipline data and providing early interventions to students with behavioral challenges through PBIS.

- Ensure that standard operating procedures are developed and updated for all processes related the use of seclusion/restraint techniques, conducting Manifestation Determination Reviews (MDRs), etc.

- Ensure that the IEPs of students with behavior management issues include behavioral goals and positive behavior interventions and supports, and the student's BIP is designed to support these goals and objectives. Behavioral goals, as with academic goals, should be measurable, reviewed frequently, and modified as needed. Best practice suggests that a functional behavioral assessment be conducted for a student whenever behavior appears to be significantly interfering with the learning process and well before behaviors reach crisis proportions.

- Ensure that both students and parents are familiar with the school's discipline code and understand the legal requirements in this particular area, and that both are involved in the development of the student's BIP.

Recommendation 18: Identify and implement a Social Emotional Learning initiative.

Social emotional learning (SEL) is defined as a process for helping children gain critical skills for life effectiveness. These include concepts such as developing positive relationships, behaving ethically and handling challenging situations effectively. Research conducted in 2011 by The Collaborative for Academic, Social, and Emotional Learning (CASEL) indicates that SEL instruction is leading to more positive social behaviors, less emotional distress, fewer suspensions and disciplinary incidents, increases in school attendance, and improved test scores and grades.[18] When schools fail to provide enough support for students, the social, emotional and behavioral challenges that often come along with learning and attention issues can lead to serious consequences such as social isolation, disproportionate disciplinary rates and an increased likelihood of skipping school, dropping out and becoming involved with the criminal justice system.[19]

For many students, especially those with special needs, competencies of self- management (the ability to regulate emotions and behaviors which includes managing stress, and controlling impulses) are a challenge to implement. They may be over or under responsive to touch, movement, sights or sounds and

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[18] Cecilia Cruse blog, "Inclusion & Social Emotional Learning for Students with Special Needs", School Specialty, Dec. 31, 2017, https://blog.schoolspecialty.com/inclusion-social-emotional-learning-for-students-with-special-needs/.

[19] Durlak, J. A., Weissberg, R. P., Dymnicky, A. B., Taylor, R. D., & Schellinger, K. B. (2011). The impact of enhancing students' social and emotional learning: A meta-analysis of school-based universal interventions. *Child Development, 82*(1), 405-432. https://www.ncld.org/social-emotional-and-behavioral-challenges.

so their sensory systems may need adjusting before they can take on more complex cognitive and emotional tasks of problem solving and/or responding appropriately to peer interactions.

Implementation of research-based SEL screening and programming will enable YCSD teachers to better identify and address the needs of special education students. It would equip teachers with strategies to better address behavioral issues that manifest in the classroom and often are resulting in more restrictive placements and, in some cases, out of division placements.

Parent Communication/Involvement

The Individuals with Disabilities Education Act (IDEA) requires that parent input and desires must be considered when districts write IEP goals, related service needs, and placement decisions. In addition, schools are required to collaborate with parents and students with disabilities when designing and implementing special education services. And, research shows as parents become involved and empowered in the special education process, outcomes for students improve.[20] As part of this program review, the review team solicited feedback from all parents of students with disabilities via a survey and telephone interviews with some hard to reach parents in order to assess their overall satisfaction with YCSD's Special Education program and services. *Chapter 5 – Parent Insights and Satisfaction* presents the detailed results of these efforts.

Observation 28: YCSD did not meet the State's target for Indicator 8: Parent Involvement.

The State Performance Plan (SPP) Indicator 8: Parent Involvement tracks the percent of parents who report that schools facilitated parent involvement as a means of improving services and results for children with disabilities. YCSD has not met the State's targets (which changed) the past two years, and YCSD had the lowest percentages of any of the comparator school divisions (see Table 4.7). YCSD was the only division, among the comparator divisions, in 2016 to not meet the State's target, and in 2017, only one other school division, Culpepper, did not meet the State's target.

Table 4.7. Indicator 8: Parent Involvement, 2016 and 2017

Indicator/Division	2016	2017
State Target	>=72%	>=74%
Albemarle	73.81%	81.75%
Culpepper	74.26%	72.84%
Fauquier	74.47%	100%
Frederick	76.88%	80.0%
Rockingham	80.60%	76.19%
Suffolk	84.38%	79.55%
York	71.26%	70.27%
State Average	80.28%	85.52%

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[20] *The Influence of Parent's Involvement on Children with Special Needs' Motivation and Learning Achievement,* Siti Bariroh, March, 2018 (https://files.eric.ed.gov/fulltext/EJ1175306.pdf).

Source. Virginia DOE, 2016 and 2017 Division Performance Reports.

Observation 29: Overall, parents are satisfied with YCSD's Special Education programs and services, but feedback provided to the review team identified several areas in need of improvement.

Parents expressed concern about the quality of school communication, including some dissatisfaction with the accessibility and responsiveness of school leaders and the frequency of IEP progress updates. Also, many parents reported limited access to parent and family resources to help them more meaningfully engage in their child's educational life.

Recommendation 19: Implement consistent strategies to provide more frequent IEP progress reporting to parents of students with disabilities throughout the school year to help parents feel more informed and engaged.

To help parents feel fully informed and able to support their child's education, YCSD should work to create additional touchpoints with parents beyond their IEP meeting. Touchpoints with parents could focus on reporting student progress through a parent accessible site (Blackboard, Schoology, etc.), progress check in phone calls, or providing proactive tips to help their child with upcoming assessments. YCSD should take care to apply these strategies across all grade levels, particularly at the middle school level.

Recommendation 20: Ensure parents of students with disabilities are provided with Procedural Safeguards and opportunities to further understand their legal rights and education opportunities for their child.

While most YCSD parents of children with disabilities felt like their child's school engaged with them during the IEP development process, few parents shared that YCSD offered them additional information to better understand their child's education. To help parents feel fully informed about their child's disability and all of the ways in which supports can be given, particularly in the post-secondary transition, YCSD should work to further educate parents on their child's rights and the range of service offerings for students with disabilities (Blackwell, 2014; Fish, 2008). This could include:

- Consistently providing parents with information in advance to help them prepare for the IEP meeting, including resources related to special education law, their child's disability, and the IEP process.

- Taking time during IEP meetings to review key issues and terms related to special education law and IEP protocol to give parents the opportunity to ask clarifying questions.

- Providing periodic workshops and seminars to walk parents through the IEP process, special education law, and YCSD services for children with disabilities.

- Sharing resources with parents related to their child's curriculum so they feel more informed and can better help at home when their child might be struggling.

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Recommendation 21: Help connect parents of students with disabilities with community resources to support them and help them fully engage in their child's educational life.

To help further engage parents of children with disabilities, YCSD can work with parents and community stakeholders to provide resources to help parents more fully engage in their child's education (Kurth et al., 2010). This could include consistently sharing information with parents about local services related to their child's disability, bringing in local community partners to participate in a back-to-school event, or having a panel of parents of students with disabilities ask questions about their experiences with post-secondary transitions. By working with parents and local stakeholders to determine what is most appropriate for each school setting, YCSD may help further integrate and engage parents of children with disabilities into their school community.

Chapter 5: Parent Insights and Satisfaction

To better understand parent satisfaction with their child's special education services, the review team surveyed 342 York County School Division (YCSD) parents of students with disabilities via an online survey. Additionally, the review team conducted telephone interviews with 34 hard-to-reach YCSD parents of students with disabilities to better understand their experiences (see *Appendix G – Parent Telephone Interview Methodology and Protocol*). The review team asked parents about satisfaction in a variety of areas within special education services, including satisfaction with different types of instructional services, transportation services, and school environment (see *Appendix F – Online Parent Survey Methodology and Instrument* for additional details about the survey methodology and administration).

Overall, parent feedback about instructional services, transportation services, and school environment was quite positive. Highlights from the parent survey include:

- Parents shared positive feedback about their experiences with the Individualized Education Program (IEP) development process and the quality of student services received, though parent opinions differed by the reported grade level and primary disability of their child.

- Parents with children in middle school and high school generally expressed satisfaction with post-secondary transition planning, though at a lower level compared with satisfaction in other areas included on the survey. Parents who identified their child as autistic shared slightly lower levels of satisfaction with post-secondary transition planning, but were still largely positive about the experience.

- Parent experiences with transportation services were overwhelmingly positive, though parents expressed some small room for improvement on the punctuality of pick-ups and drop-offs.

- Parents agreed that YCSD created a respectful environment for them and their children, but expressed some concern about bullying and violence in their child's school.

- Across parent surveys and interviews, parents expressed concern about the quality of school communication, including some dissatisfaction with the accessibility and responsiveness of campus leaders and the frequency of IEP progress updates.

- Many parents reported relatively low access to additional parent and family resources to help them more meaningfully engage in their child's educational life.

Satisfaction with Instructional Services

As part of the parent survey and interviews of hard-to-reach parents, the review team asked parents about their satisfaction with instructional services in YCSD, including the IEP development process, the quality of the services students received, and the transition planning process. Overall, parents were satisfied with the quality of services their child received. Parents also shared that their experiences through the IEP development process were positive, though a slightly smaller proportion of parents agreed that their child's school communicated with them regularly about their child's progress toward

their IEP goals compared with other aspects of IEP development and monitoring. Parents shared a high level of agreement when asked about the quality of services their students received, particularly related to their time in the general education setting. Parents were somewhat less positive about school services outside of classroom instruction. Across all areas within instructional services, parent opinions differed by both the grade level and primary disability of a student, though responses were still largely positive across subgroups. Parents were somewhat less positive about their postsecondary planning experience with the division relative to their satisfaction in other areas included on the survey, with some large differences by primary disability.

IEP Development

When asked about the process for developing, implementing, and following up on the IEP of their child, parents were generally positive about their experiences with YCSD. Overall, 79 percent of parents agreed that they had positive experiences at IEP meetings. Figure 5.1 shows that 85 percent or more of parents agreed that at IEP meetings, the team selected accommodations that their child needed (87%), that they had thorough discussions of goals and objectives (87%), that staff conveyed sufficient knowledge about the IEP process (87%), and that placement decisions were made using data and input from all IEP team members, including parents (85%). Roughly three-quarters or more of parents agreed with nearly every survey item asked about the IEP process. However, a slightly lower proportion of parents agreed that their child's school communicated with them about their child's IEP progress once the IEP was in place, though 71 percent still agreed with this sentiment.
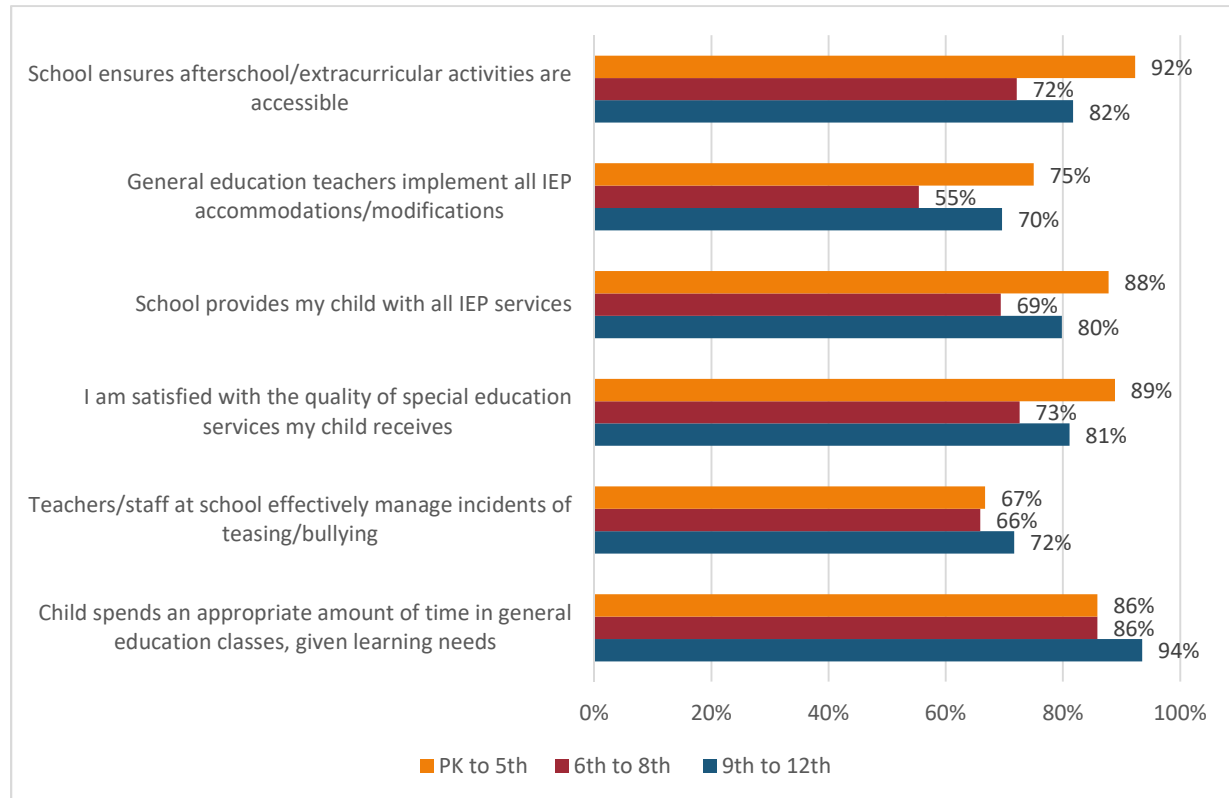
Figure 5.1. Satisfaction with IEP Development
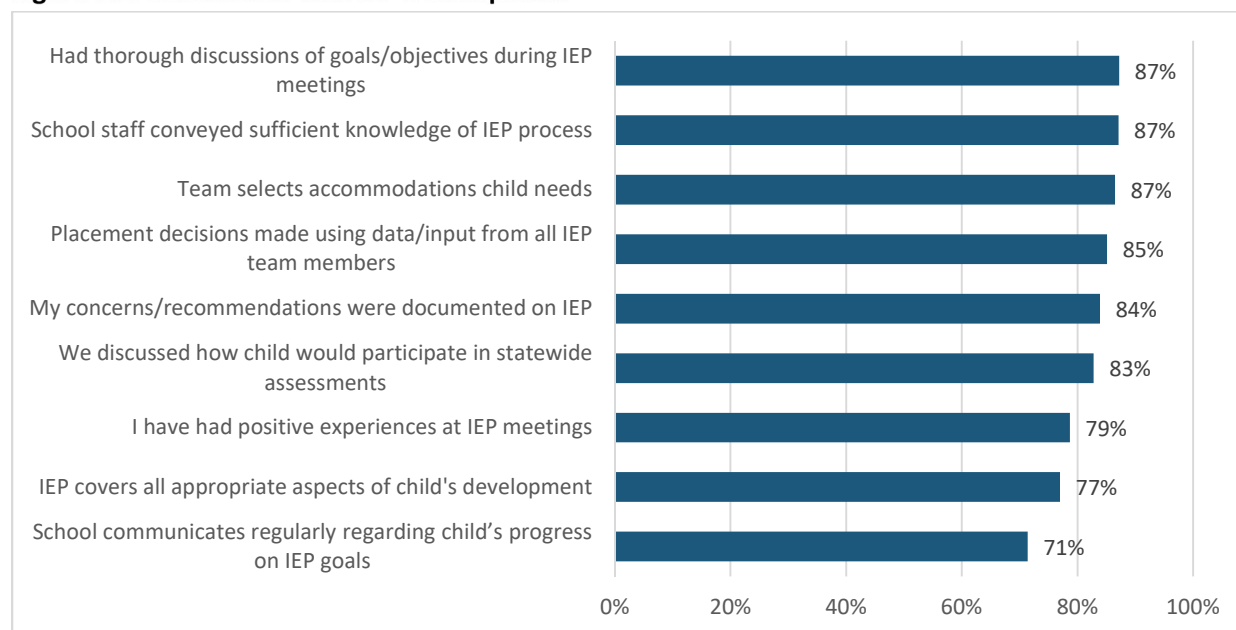
Source. Data from YCSD Parents of Students Receiving Special Education Services Survey, 2019.

*Note: This figure represents responses from 319 parents.

While parents were generally positive about their experiences with the IEP process, some differences in agreement with these items existed by the primary disability and grade level of a parent's oldest child. Table 5.1 illustrates that a larger proportion of parents of students with developmental delays agreed with the survey items about the IEP process and experience when compared with parents of students with different primary exceptionalities. All parents of students with developmental delays either agreed or strongly agreed with seven of the nine survey items referencing the IEP process and experience, including that they had had positive experiences at IEP meetings and that their concerns and recommendations were documented on their child's IEP. Parents who listed their student's primary disability as "Other" also reported slightly more agreement with the survey items about the IEP process than parents of students with other primary exceptionalities.

Table 5.1. Satisfaction with IEP Development by Parent-Reported Student Primary Disability

	Autism	Develop. Delay	Multiple Disabilities	Other Health Impairment	Specific Learning Disability	Speech/ Language Impairment	Other
My concerns/ recommendations were documented on IEP	81.3%	100.0%	81.0%	76.5%	82.9%	92.3%	88.7%
Had thorough discussions of goals/ objectives during IEP meetings	91.4%	100.0%	89.8%	78.8%	78.9%	71.4%	93.8%
We discussed how child would participate in statewide assessments	87.1%	100.0%	83.6%	76.7%	80.0%	80.0%	86.4%
IEP covers all appropriate aspects of child's development	72.7%	100.0%	71.2%	73.5%	71.4%	76.9%	87.3%
Placement decisions made using data/input from all IEP team members	85.3%	100.0%	82.8%	82.8%	80.6%	76.9%	92.9%
I have had positive experiences at IEP meetings	82.9%	100.0%	85.0%	87.9%	89.5%	76.9%	87.9%
Team selects accommodations child needs	82.4%	100.0%	83.3%	88.2%	79.4%	92.3%	94.9%
School staff conveyed sufficient knowledge of IEP process	77.1%	83.3%	76.3%	78.1%	71.1%	71.4%	87.7%
School communicates regularly regarding	67.6%	83.3%	81.5%	63.3%	64.9%	57.1%	79.0%

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	Autism	Develop. Delay	Multiple Disabilities	Other Health Impairment	Specific Learning Disability	Speech/ Language Impairment	Other
child's progress on IEP goals							
N	43	6	66	38	41	17	97

Source. Data from YCSD Parents of Students Receiving Special Education Services Survey, 2019.

*Note: Parents who reported their child's primary disability as visual impairment, hearing impairment, traumatic brain injury, and intellectual disability are excluded from the figure due to small cell size (n<5).

When considering parent satisfaction with the IEP process, parents of students in middle school grades were generally less positive when compared with parents who reported that their students were in elementary or high school grades (Figure 5.2). For example, 92 percent of parent respondents who reported their child's grade at the elementary school level and 90 percent of parents of students at the high school level agreed that they had thorough discussions of goals and objectives as part of their child's IEP meeting compared with 81 percent of parents of middle school students. The difference was quite stark when considering parent agreement that the school communicates with them regularly regarding their child's IEP progress – 58 percent of middle school parents agreed compared with 75 percent of parents of high school students and 81 percent of parents of elementary school students. While middle school parents were somewhat less positive about the IEP process, it is important to note that more than half of parents agreed or strongly agreed with each survey item.

Figure 5.2. Satisfaction with IEP Development, by Parent-Reported Student Grade Level
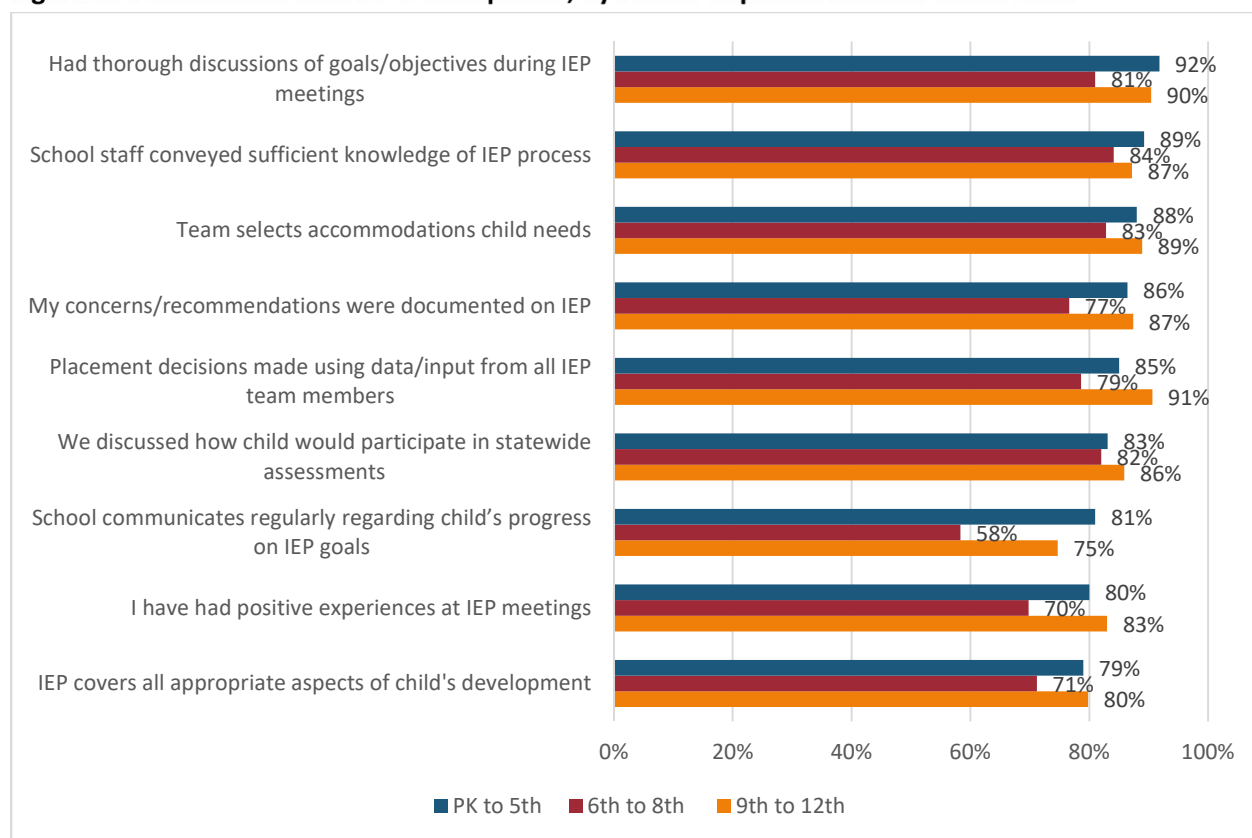
Source. Data from YCSD Parents of Students Receiving Special Education Services Survey, 2019.

*Note: This figure represents responses from 314 parents, including parents who reported their oldest child's grade was in Pre-K to 5th grade (n=102), 6th to 8th grade (n=76), and 9th to 12th grade (n=136).

In addition to surveying parents, the review team also reached out to a subset of hard-to-reach parents to ask about their experiences with their child's IEP development and progress. Of the parents interviewed via telephone, 61 percent agreed that the services their child received help them make progress toward IEP learning goals. In particular, one parent noted that their child had made more progress in their time at their current school than at any other schools combined, and that they have experienced "a level of attention and dedication that's unlike other schools."

While many of the interviewed parents had positive experiences with their child's IEP development and progress, some parents who were satisfied with their child's IEP progress highlighted negative experiences about the IEP process. Some parents noted that the process of getting or updating an IEP was frustrating and shared that they felt like the school was too busy to schedule a meeting to revise their child's IEP. Parents also shared some frustrations about the IEP goals themselves, expressing that concerns that expectations were set too high, that IEP goals were vague, and that IEPs do not address all of their student's needs. Among parents who expressed dissatisfaction with their child's IEP progress, interviewed parents shared concerns that their child's IEP accommodations were applied inconsistently across various settings and staff.

Quality of Student Services

Parents were also generally satisfied with the quality of special education services their child received. Figure 5.3 illustrates that 67 percent of parents agreed that they were satisfied with the quality of special education services their child received. When asked about their child's inclusion in general education, 89 percent of parents agreed that their child spends an appropriate amount of time in general education, given their learning needs. Additionally, 80 percent of parents agreed that their child's general education teachers implement all IEP accommodations and modifications. Similarly, 80 percent of parents agreed that their child's school provided their child with all of the services on their IEP. While a high proportion of parents agreed, 20 percent of parents indicated that general education teachers and their child's school were not providing their child with the accommodations included on their child's IEP. Outside of classroom instruction, about two-thirds of parents agreed that their child's school ensures that afterschool and extracurricular activities are accessible for students with disabilities (68%) and that teachers and staff at their child's school effectively manage incidents of teasing or bullying (65%).

Figure 5.3. Satisfaction with the Quality of Student Services Received
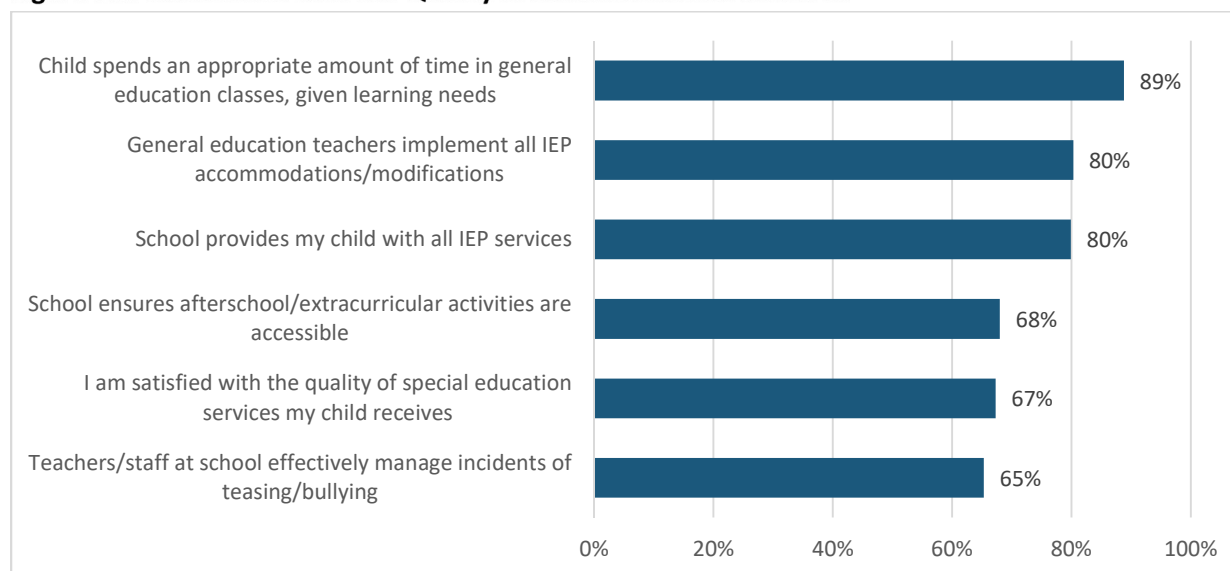
Source. Data from YCSD Parents of Students Receiving Special Education Services Survey, 2019.

*Note: This figure represents responses from 319 parents.

Parent opinions about the quality of special education services received by their child(ren) varied in a couple of key ways across student subgroups. Parents with elementary and high school aged children were generally more positive about the special education services their child received than parents of students in middle school grades. For example, 89 percent of parents who reported that their child was in elementary school agreed that they were satisfied with the special education services their child received, compared with 73 percent of parents of students in middle school. Parents of high school aged students typically expressed a level of agreement somewhere between elementary and middle school parents – 81 percent agreed that they were satisfied with the quality of special education services their child received. In some cases, parents of high school students were more positive than either middle

school or elementary school parents. Figure 5.4 shows that 94 percent of parents of high school students agreed that their child spends an appropriate amount of time in the general education setting given their learning needs, while 86 percent of both elementary and middle school parents said the same.

Figure 5.4. Satisfaction with the Quality of Student Services Received, by Parent-Reported Student Grade Level

Source. Data from YCSD Parents of Students Receiving Special Education Services Survey, 2019.

*Note: This figure represents responses from 314 parents, including parents who reported their oldest child's grade was in Pre-K to 5th grade (n=102), 6th to 8th grade (n=76), and 9th to 12th grade (n=136).

While there were few substantive differences by a family's military status, a smaller proportion of parents in military families agreed that their child's school ensures that afterschool and extracurricular activities were accessible to students receiving special education services – 58 percent of parents in military families agreed compared with 71 percent of parents in non-military families, a difference of 13 percentage points.

Overall, 60 percent of interviewed parents reported that they were satisfied with the school's ability to address their child's needs, with 33 percent saying they were extremely satisfied and 27 percent saying they were somewhat satisfied. Another 27 percent of parents interviewed said they were dissatisfied, with 18 percent sharing that they were extremely dissatisfied. Some of the parents interviewed noted that their experience with YCSD has been more positive than with other school divisions and that they sought out YCSD for its special education services. Others expressed concern about the lack of communication with the school in a variety of ways, including little follow through from their child's school

related to specific incidents, a lack of communication when students were not doing well in school, and a lack of resources and information for parents regarding their student's disability.

When asked about specific types of school services, the satisfaction of interviewed parents was mixed. Focusing on their child's experiences in the general education setting, 61 percent of hard-to-reach parents expressed satisfaction with the services their child received. Many parents highlighted instructional services, such as hands-on instruction in a one-on-one environment, the amount of time received for services, extra time on tests, preferential seating, classroom aides, or other accommodations as noteworthy. While interviewed parents were generally satisfied about their child's experience in the general education setting, they expressed less satisfaction with other staff members. Just 30 percent expressed satisfaction with the services received from para-educators and related service providers in YCSD. In some cases, this lack of satisfaction seems to stem from parent concerns about the quality of pull-out services with parents citing a lack of one-on-one time with related service providers or accommodations that are not being made through pull-out services.

Transition Planning

While the transition to life after high school can be challenging for any student, it poses unique challenges for students receiving special education services. When parents of students in Grade 6 or higher were asked about their experiences with postsecondary planning for their child receiving special education services, parents were mostly positive. Overall, 59 percent of parents agreed that their child's school provides quality transition planning for after high school, including services to help their child achieve their postsecondary goals. Parents also generally agreed that the transition outcomes developed for their child were appropriate for his or her needs (65%) and that services are provided to help students become self-sufficient after high school (63%).

Parent satisfaction with the postsecondary transition planning for their child varied by the student's primary disability (Figure 5.5). Parents of students with autism often expressed lower levels of agreement with the questions related to transition planning. For example, just over half of parents of students with autism (53%) agreed that their child's school provides quality transition planning for life after high school, compared with roughly two-thirds of parents of students with specific learning disabilities (67%) and other primary disabilities (64%). Just 40 percent of parents of students with autism agreed that the school provides services to help students become self-sufficient after high school, while 75 percent of parents of students with other health impairments agreed.

Figure 5.5. Satisfaction with Transition Planning, by Parent-Reported Student Primary Disability
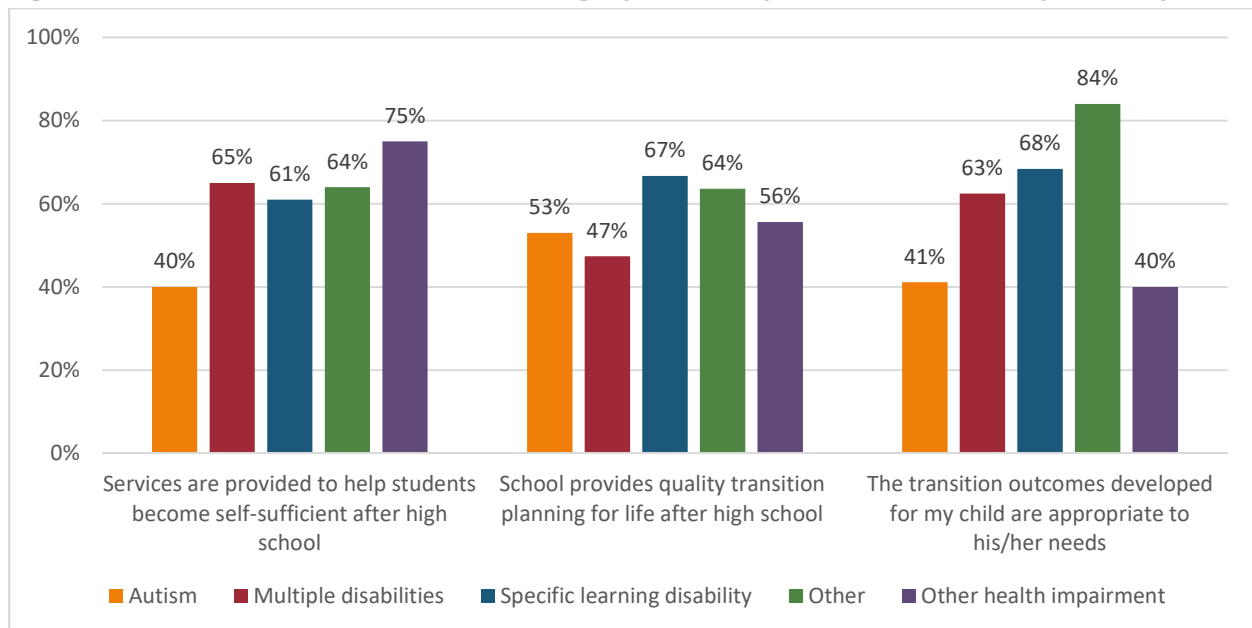
Source. Data from YCSD Parents of Students Receiving Special Education Services Survey, 2019.

*Note: This figure represents responses from 95 parents who responded to questions about postsecondary transitions for their student in 6th grade or higher.[1] This includes parents who reported their oldest child's primary disability as autism (n=17), specific learning disability (n=19), other health impairment (n=10), multiple disabilities (n=24), and other (n=25). Parents who reported their child's primary disability as visual impairment, hearing impairment, speech or language impairment, traumatic brain injury, developmental delay, and intellectual disability are excluded from the figure due to small cell size (n<5).[2]

In nearly every case, there are few substantive differences in opinion between military families and non-military families with respect to their experience with special education services for their children in YCSD. However, when asked whether their child's school provides quality transition planning for life after high school, a smaller proportion of parents in military families with students receiving special education services agreed compared with parents in non-military families. Just under half of parents in military families with students receiving special education services (47%) agreed that their child's school provides quality transition for life after high school while 61 percent of parents in non-military families agreed.

Transportation Services

In addition to instructional services, parents were asked about the extent to which their students who receive special education services use transportation provided by YCSD. Parents shared overwhelmingly

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[1] Responses from parents who noted that their oldest child who received special education services was in 5th grade or younger were excluded from this figure.

[2] Note that in some cases the N value for a disability category may represent a parent's response if their child qualifies for that disability as the either the primary, secondary, or tertiary disability.

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positive experiences with school transportation services, though a slightly larger proportion of parents expressed dissatisfaction with the punctuality of school transportation.

Among parents who replied to the survey, 68 percent said their child regularly takes a school bus, van or other vehicle to school, while 39 percent of students regularly arrive at school via a family car or vehicle (Figure 5.6). A small proportion of students get to school by riding with friends or family (8%) and 5 percent typically walk to school. Just 3 percent or fewer students get to school by riding their bike (3%), taking public transportation (1%), carpooling with other families (1%), and less than 1 percent take a taxi car, other car ride sharing, or use a different form of transportation.[3]

Figure 5.6. Use of Daily Transportation
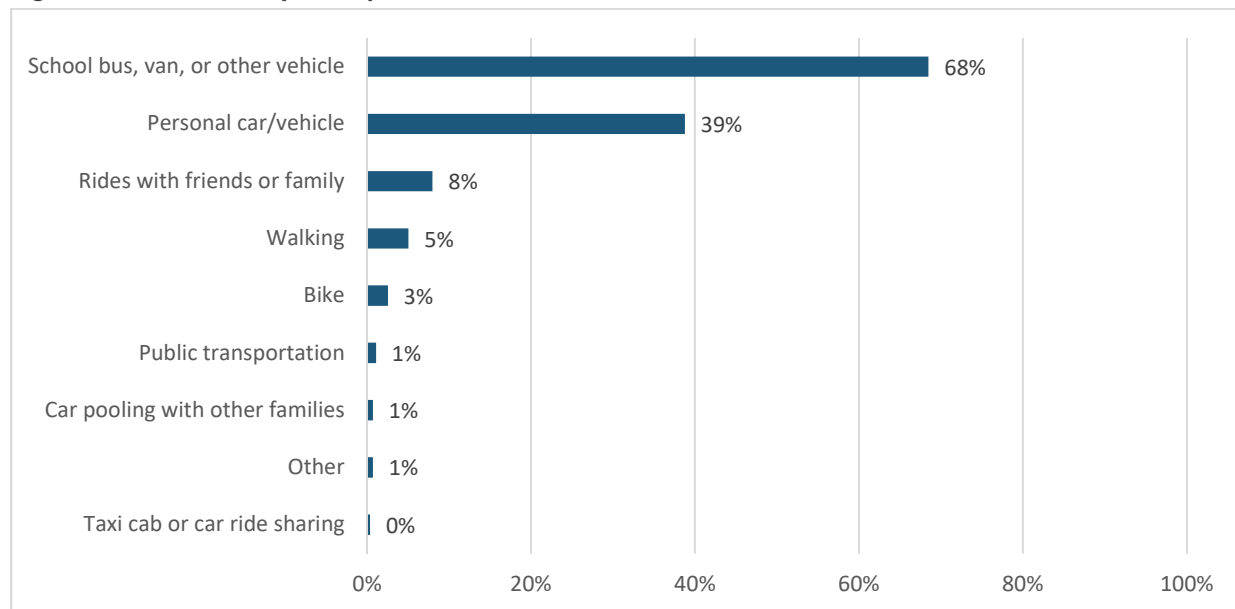
Category	Percentage
School bus, van, or other vehicle	68%
Personal car/vehicle	39%
Rides with friends or family	8%
Walking	5%
Bike	3%
Public transportation	1%
Car pooling with other families	1%
Other	1%
Taxi cab or car ride sharing	0%

Source. Data from YCSD Parents of Students Receiving Special Education Services Survey, 2019.

*Note 1: This figure represents responses from 319 parents. Parents had the option to select multiple forms of transportation, so figures do not add to 100%.

*Note 2: York County does not have public transportation.

Parents were overwhelmingly satisfied with the transportation options and services available to them. Nearly all parents reported being satisfied with the process of applying for transportation from their child's school (96%) and the level of access to transportation options for their child where they live (95%). Of all surveyed parents, regardless of the form of transportation used to get their child to school, 92 percent reported satisfaction with how safe and secure they and their child felt during transport to school.

A subset of questions related to transportation experience were asked of parents who reported that their child used some form of public transportation to get to school, including school bus and public/city

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[3] York County does not offer public transportation.

transportation.[4] Figure 5.7 illustrates that parents were very satisfied with their experience with public transportation for their child. Overall, 91 percent of parents were satisfied with their child's school transportation experience. From the reliability and quality of equipment (99%) to the courtesy of drivers and staff (95%) to how drivers and staff handle emergencies (95%), parents expressed satisfaction with the school transportation used by their child. While parents reported satisfaction across the board, they reported being satisfied somewhat less frequently with the punctuality of school transportation – 86 percent of parents expressed satisfaction with the on-time pick-ups and arrivals of their child's school transportation.

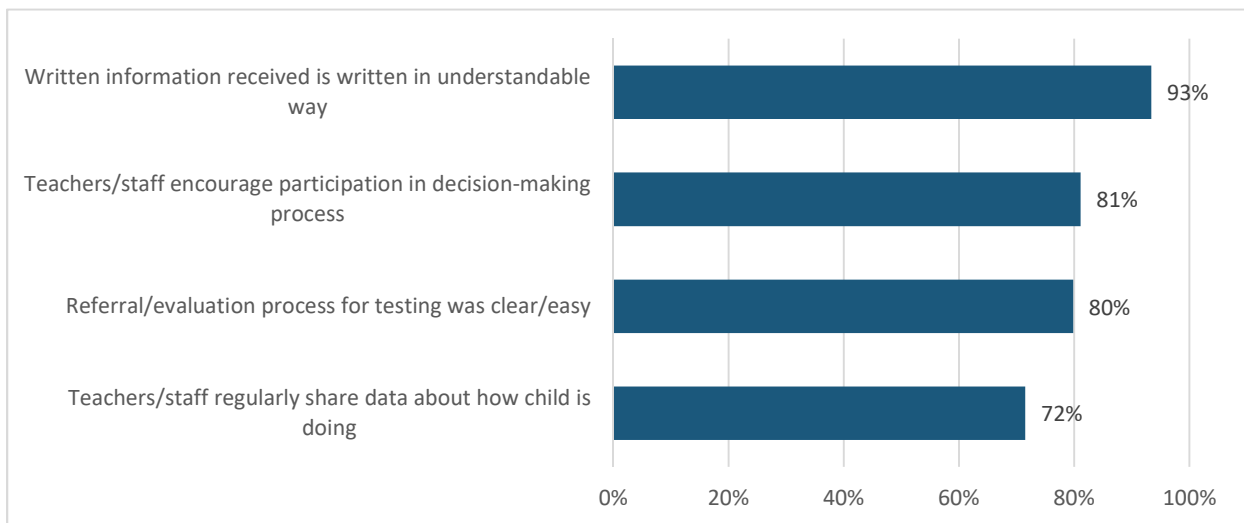**Figure 5.7. Satisfaction with Transportation Services**
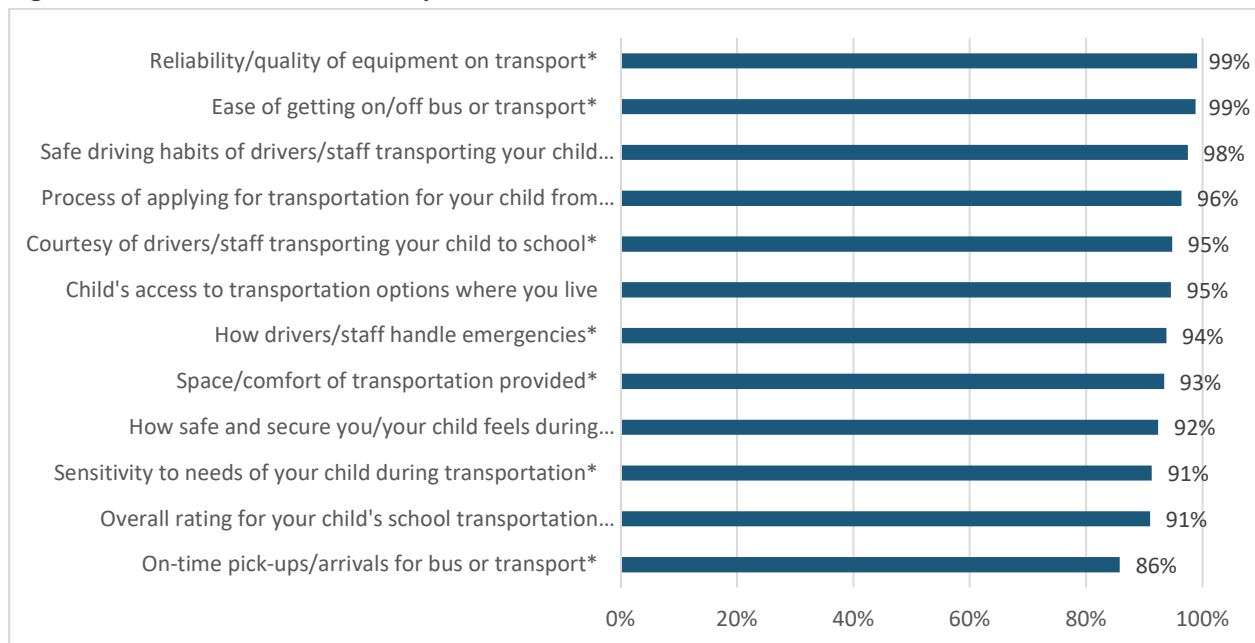
Source. Data from YCSD Parents of Students Receiving Special Education Services Survey, 2019.

*Note: This figure represents responses from 239 parents. * indicates that the question was only asked to parents who indicated that their student receiving special education services used some form of public transportation to get to school (either a school bus or van, or public transportation).

While satisfaction with transportation services was generally common across all grade levels, a smaller proportion of parents at the elementary school level whose child used a school bus or van to get to school reported that they were satisfied or extremely satisfied with the on-time pick-ups and arrivals for the bus or transportation. Roughly three-quarters of parents of elementary aged students (77%) were satisfied with the punctuality of the school bus, compared with 93 percent of parents of high school aged students. Despite this difference, most parents were satisfied with the timeliness of school transportation.

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[4] Of the 173 parents asked this subset of questions, 1% (n=2) had children who received special education services that only took city/public transportation to school while 99% (n=171) used school buses to get their child to school.

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School Environment

The review team asked parents about the extent to which their child's school created a respectful environment for their students and families, facilitated communication with families in a variety of ways, and offered parents and families resources related to their child's special education services. While there were some differences in level of agreement by primary disability and grade level, parents were quite positive about communication with their child's school. Interviewed parents also had broadly positive experiences, but pointed to the accessibility and responsiveness of campus leaders as a concern. Parent perceptions about the extent to which their child's school created a respectful environment were mixed. Parents of students receiving special education services agreed that their child's school is respectful of them and their students, but shared concerns about bullying and violence in their child's school. Parent agreement about bullying and violence differed considerably by student race/ethnicity and primary disability. Parents of Asian students and parents of students with specific learning disabilities were among the most concerned about bullying when compared with parents of students of other race/ethnicities and primary disabilities. Finally, satisfaction with access to additional resources for parents and families to better engage in the educational life of their child receiving special education services was low, particularly in light of generally positive parent responses.

Respectful Environment

Parents of students who receive special education services agreed that YCSD creates a respectful environment in a variety of ways. By respecting their cultural heritage (93%), showing sensitivity to students with disabilities and their families (81%), and treating them as a team member (78%), YCSD helps to foster a respectful environment with parents. While parents generally agreed that their child's school helped create a respectful environment for parents, parents expressed concern about bullying and violence in their child's school. More than three-quarters of parents (78%) agreed that they worry about crime and violence in their child's school, and just under half (48%) agreed that bullying is a problem at their child's school.

Though parents agreed that their child's school generally created a respectful environment for parents, the level of agreement varied by the primary disability of their child. As Figure 5.8 illustrates, every parent of a student with a developmental delay who responded to the survey agreed that their child's school showed sensitivity to the needs of students with disabilities and their families while two-thirds (67%) of parents of students with a specific learning disability said the same. While parents of students with developmental delays had positive feedback about the way their child's school showed sensitivity to their needs, they were a bit more restrained when asked whether their child's school treated them as a team member – 67 percent of parents of students with developmental delays agreed that they were treated as team members. Parents who reported their student's primary disability as autism, speech/language impairment, other health impairment, multiple disabilities, or other shared a similar level of agreement across these survey items.

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Figure 5.8. Respectful Environment at Child's School, by Parent-Reported Student Primary Disability
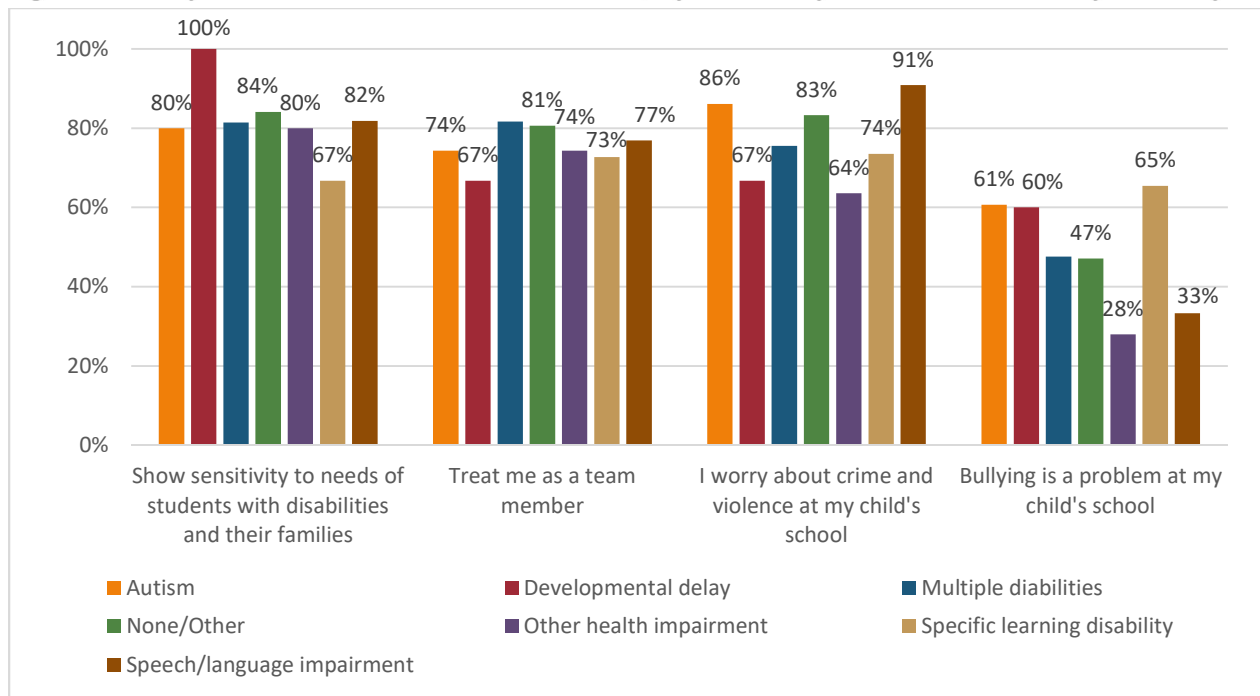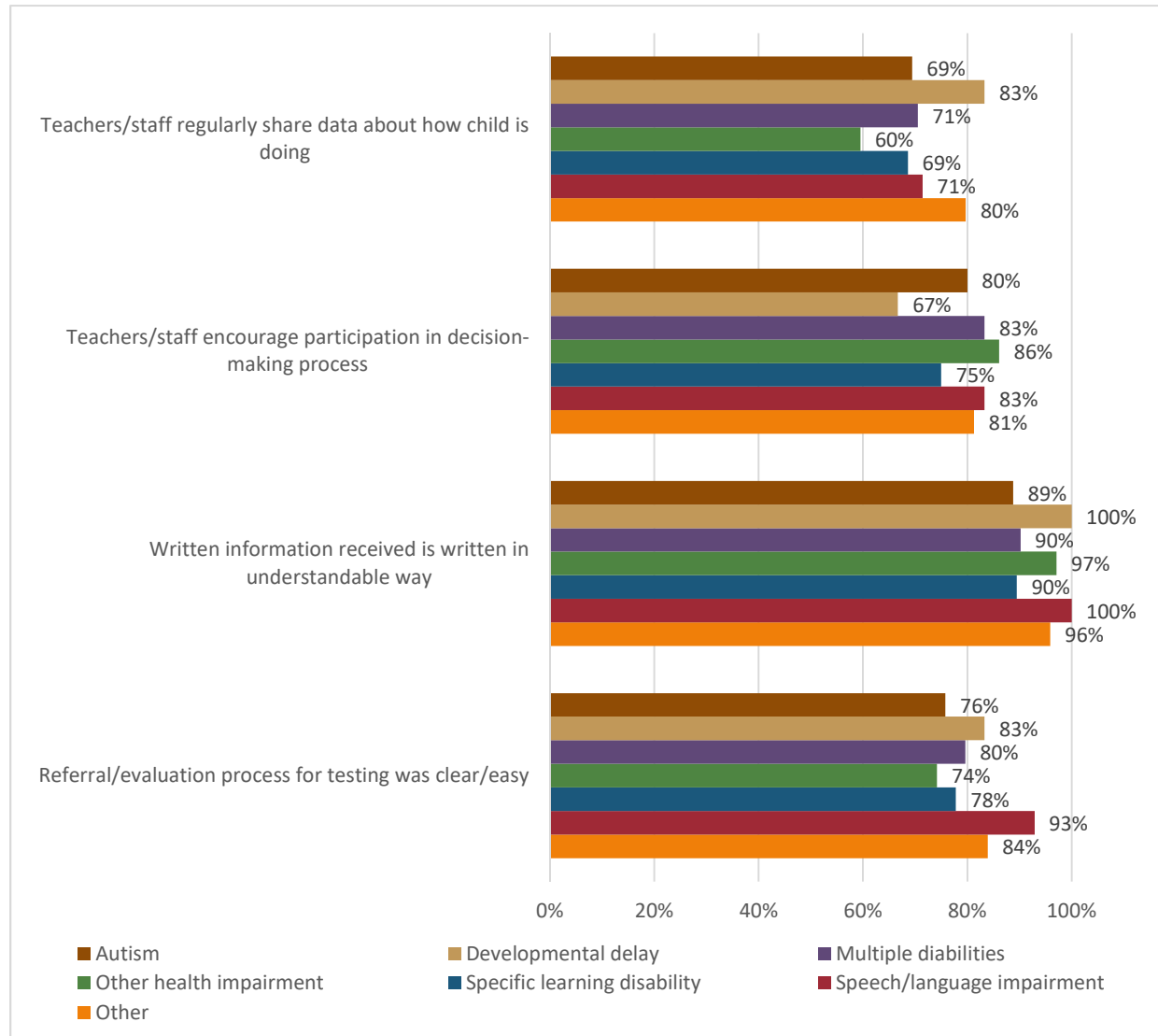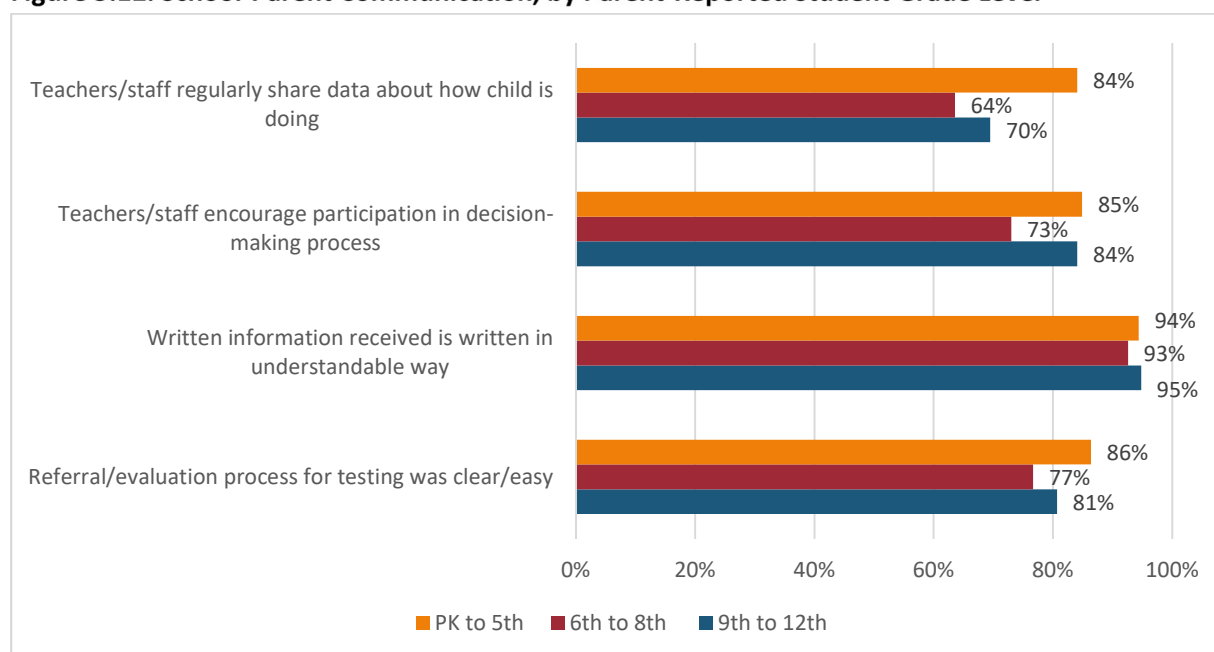

Source. Data from YCSD Parents of Students Receiving Special Education Services Survey, 2019.

*Note: This figure represents responses from 308 parents, including parents who reported their oldest child's primary disability as autism (n=43), specific learning disability (n=41), speech or language impairment (n=17), other health impairment (n=38), developmental delay (n=6), multiple disabilities (n=66), and other (n=97). Parents who reported their child's primary disability as visual impairment, hearing impairment, traumatic brain injury, and intellectual disability are excluded from the figure due to small cell size (n<5).[5]

When asked about the level of violence and bullying in their child's school, parent agreement was quite different when considering their child's reported primary disability. Nearly all parents of students with speech or language impairments (91%) agreed that they worry about crime and violence in their child's school, compared with 64 percent of parents of students with other health impairments and 67 percent of those with developmental delays (Figure 5.8). Six-in-ten or more of parents who reported their child's primary disability as a specific learning disability (65%), autism (61%), or developmental delay (60%) agreed that bullying was a problem at their child's school. Just under half of parents of students with multiple disabilities (48%) or other disabilities (47%) agreed that bullying at their child's school was problematic. While parents of students with speech and language impairments were most concerned about crime and violence in their child's school, they were among the least concerned about bullying. One third or fewer of parents of students with speech or language impairments (33%) or other health impairments (28%) agreed that bullying was a problem.

Parent agreement about the environment at their child's school also varied by a child's reported race/ethnicity, though feedback was still generally positive across all groups. Figure 5.9 shows that all

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[5] Note that in some cases the N value for a disability category may represent a parent's response if their child qualifies for that disability as the either the primary, secondary, or tertiary disability.

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parents of students of two or more races agreed that their child's school showed sensitivity to the needs of students with disabilities and their families, compared with 80 percent of parents of White, Asian, and Hispanic descent. Nearly all parents of who reported that their student was Asian or White agreed that their child's school respected their cultural heritage. A slightly lower proportion of parents of Black/African American (85%), Hispanic (88%), and multiracial (88%) students said the same. While 85 percent to 90 percent of parents of students across race/ethnicity categories agreed that their child's school treated them as a team member, a slightly smaller proportion of parents of White students (74%) agreed that their child's school treats them as a team member.

When asked about violence and bullying at their child's school, the level of parent agreement varied more substantially. For example, 90 percent of parents of Asian students agreed that they worried about crime and violence at their child's school compared with roughly two-thirds of parents of multiracial (67%) and Black/African American (65%) students. Parents of Asian students were also among the most concerned about bullying in their child's school – 78 percent agreed that it was a problem. Just 17 percent of parents of students of two or more races said the same.

Figure 5.9. Respectful Environment at Child's School, by Parent-Reported Student Race/Ethnicity
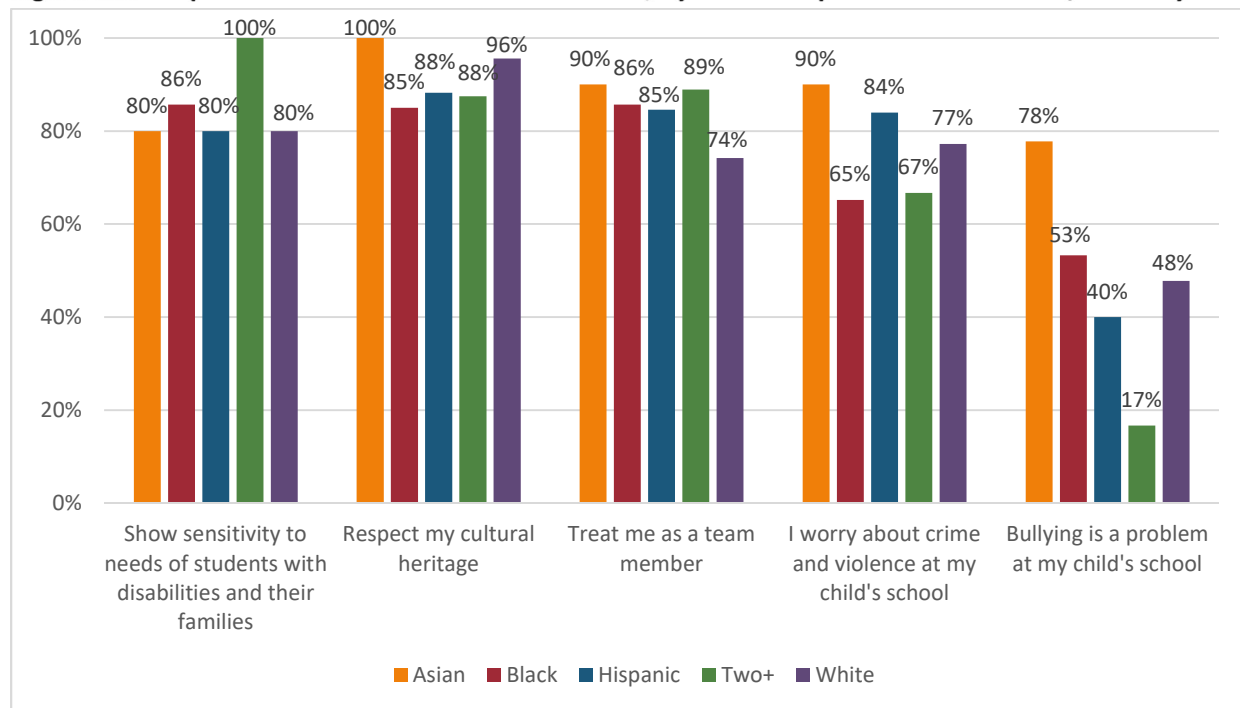
Source. Data from YCSD Parents of Students Receiving Special Education Services Survey, 2019.

*Note: This figure represents responses from 307 parents, including parents who reported their oldest child's race/ethnicity as White (n=229), Black/African American (n=27), Asian (n=11), Two or more races (n=12), and Hispanic (n=28). Parents who reported their child's race/ethnicity as American Indian or other are excluded from the figure due to small cell size (n<5).

Communication

Parents who completed the survey were generally quite positive about the way their child's school staff and teachers communicate with them about their child. As shown in Figure 5.10, when asked about the clarity and communication around referral and evaluation processes, most parents agreed or strongly agreed that written information that they receive about their child is written in an understandable way (93%) and that the referral and evaluation process for testing was clear and easy (80%). As part of the communication process, most parents of students receiving special education services felt like teachers and staff at their child's school encourage them to be a part of the decision-making process with respect to the services their child receives (81%). Compared with the other survey items asked of parent respondents, a slightly smaller proportion of parents reported that they agreed or strongly agreed that teachers and staff at their child's school regularly share data about how their child is doing. While parents generally agreed that their child's teachers and staff provided data about how their child is doing, they did so somewhat less frequently than each of the other items related to parent communication.
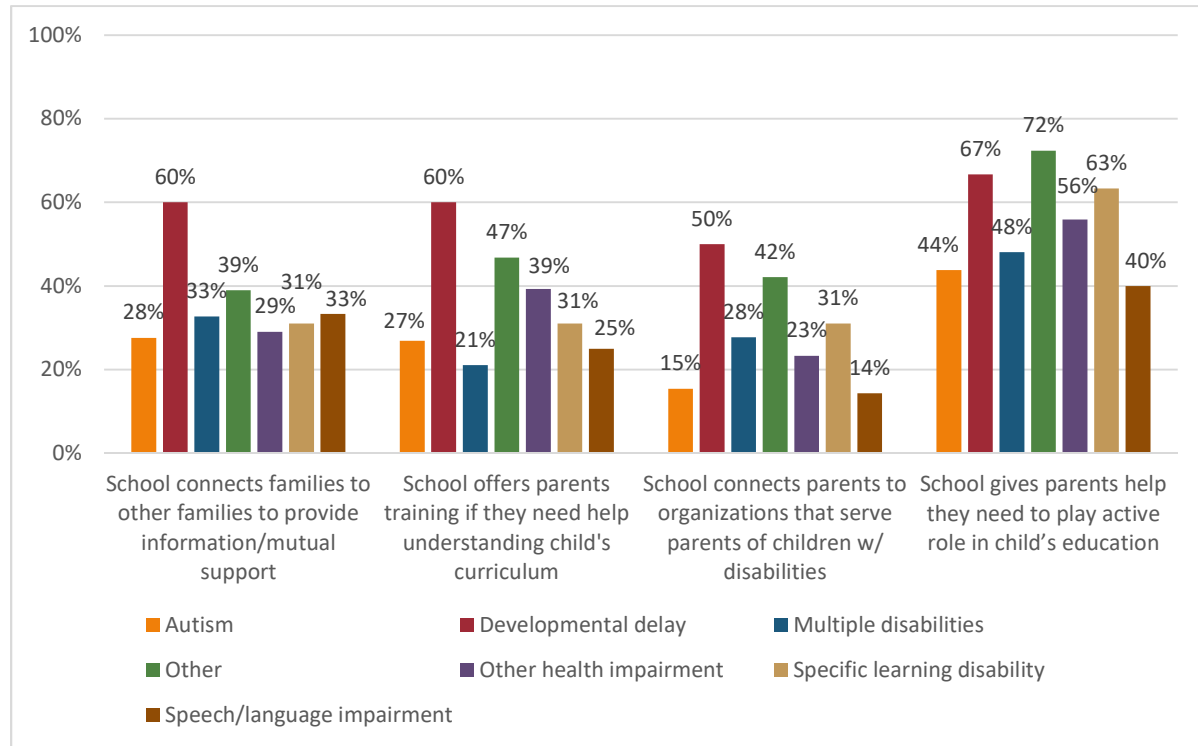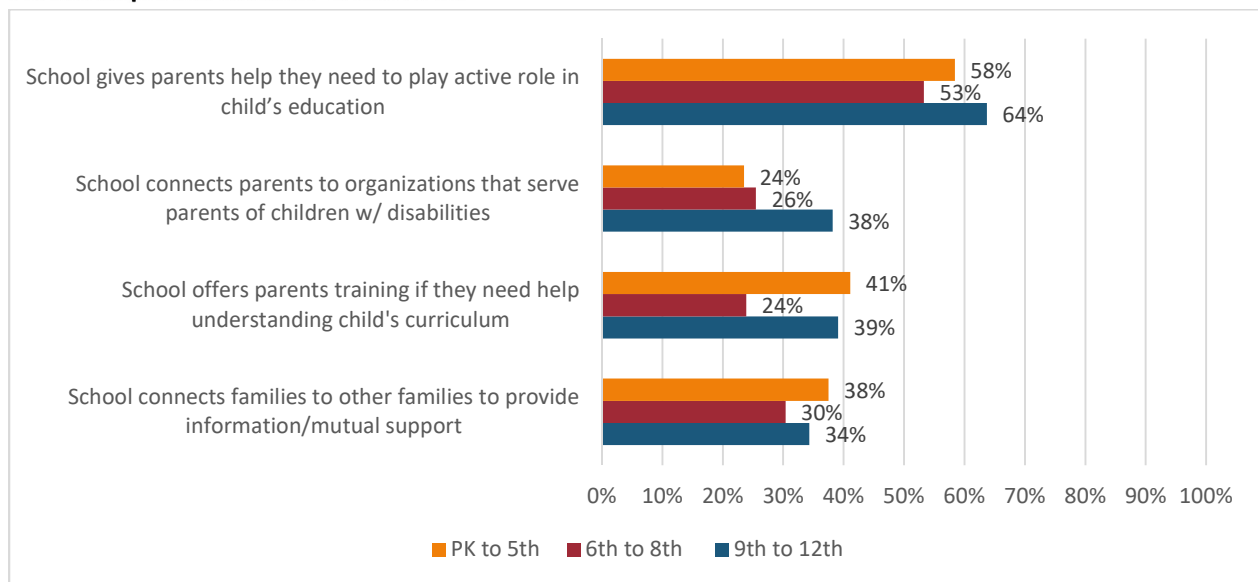
Figure 5.10. School-Parent Communication

Source. Data from YCSD Parents of Students Receiving Special Education Services Survey, 2019.

*Note: This figure represents responses from 319 parents.

While a large proportion of parents had positive feelings about communication with their child's school related to special education services, there were some differences in the level of agreement amongst parents depending on the primary disability of their child. Figure 5.11 illustrates that parents of students with developmental delays and parents of students with speech or language impairments agreed most frequently that their child's school facilitated communication. For example, all or nearly all parents of students with speech or language impairments agreed that information received was written in an understandable way (100%) and that the process for referral and evaluation was clear and easy (93%). Parents whose child's primary disability is other health impairment generally shared a lower level of agreement with items related to parent/family communication. For example, 74 percent of parents of students with other health impairments agreed that the referral process was clear and easy, compared

with 93 percent of parents of students with speech or language impairments. Similarly, 60 percent of parents of students with other health impairments agreed that teachers and staff regularly share data about how their child is doing, while 83 percent of parents of students with developmental delays said the same.

Figure 5.11. School-Parent Communication, by Parent-Reported Student Primary Disability
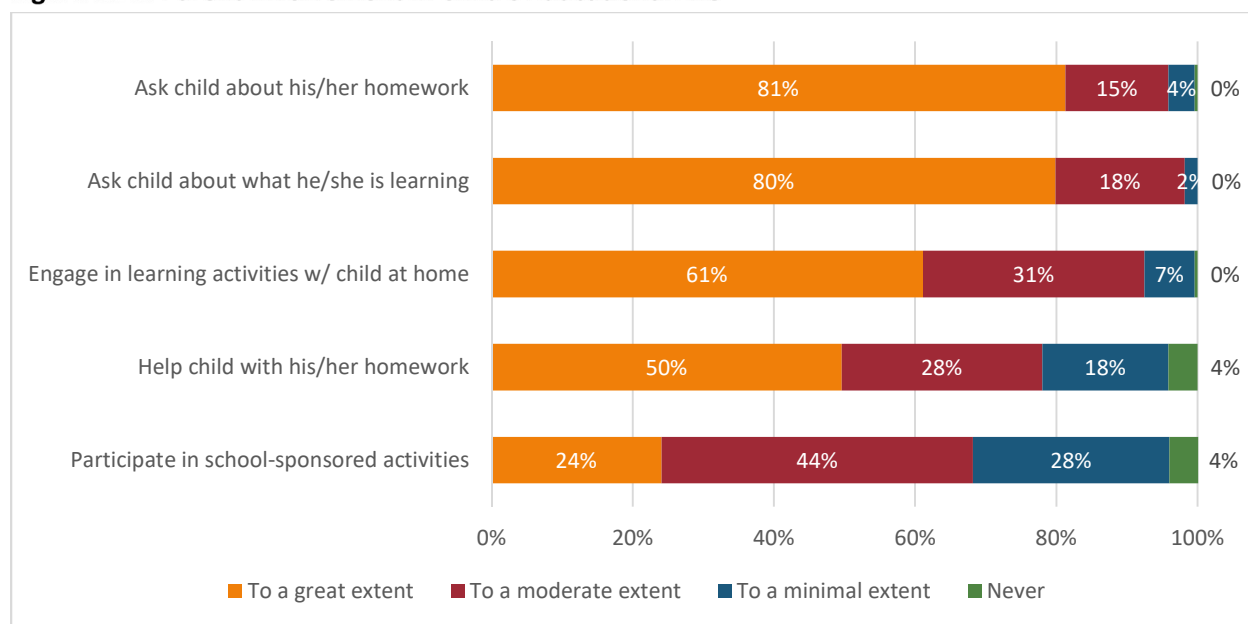

Source. Data from YCSD Parents of Students Receiving Special Education Services Survey, 2019.

*Note: This figure represents responses from 308 parents, including parents who reported their oldest child's primary disability as autism (n=43), specific learning disability (n=41), speech or language impairment (n=17), other health impairment (n=38), developmental delay (n=6), multiple disabilities (n=66), and other (n=97). Parents who reported their child's primary disability as visual impairment, hearing impairment, traumatic brain injury, and intellectual disability are excluded from the figure due to small cell size (n<5).[6]

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[6] Note that in some cases the N value for a disability category may represent a parent's response if their child qualifies for that disability as the either the primary, secondary, or tertiary disability.

Beyond student primary disability, parents with students at different grade levels reported slightly different experiences with communication with their child's school. A larger proportion of parents of students in elementary grades and in high school grades agreed that their child's school facilitated communication in a variety of ways compared with parents of students in middle school grades (Figure 12). For example, 85 percent of elementary school parents and 84 percent of high school parents agreed that teachers and staff at their child's school encouraged them to participate in the decision-making process, compared with 73 percent of parents of middle school students. While agreement was generally lower among middle school parents, it is important to note that 64 percent or more of middle school parents agreed with every survey item related to parent and family communication.

Figure 5.12. School-Parent Communication, by Parent-Reported Student Grade Level

Source. Data from YCSD Parents of Students Receiving Special Education Services Survey, 2019.

*Note: This figure represents responses from 314 parents, including parents who reported their oldest child's grade was in Pre-K to 5th grade (n=102), 6th to 8th grade (n=76), and 9th to 12th grade (n=136).

While parents in military families typically did not share different opinions from their non-military parent counterparts, a smaller proportion of parents in military families agreed that teachers and staff at their child's school encouraged them to participate in the decision-making process – 70 percent of parents in military families agreed with the sentiment compared to 85 percent of parents in non-military families.

When conducting telephone interviews with parents, the review team asked about their satisfaction with the level of communication with school staff. Interviewed parents shared mixed reviews about satisfaction with the quality of communication with their child's school. Just over half (55%) of interviewed parents expressed satisfaction with communication with their child's general education teacher(s). Just under half of interviewed parents (45%) reported satisfaction with the quality of communication with related service providers at their child's school and another 42 percent of parents reported satisfaction with the quality

of their communication from campus leaders. Parents that had positive experiences with school communication highlighted the responsiveness of child's school alongside the frequency with which they received progress reports and updates. Among those who shared negative reflections on school communication, common themes included the limited accessibility and responsiveness of campus leaders and the feeling that communication is often a "one-way street", where communication only occurs at the request of a parent.

Family Resources

School divisions can provide families with a wide variety of resources to help them more meaningfully engage in the educational lives of their children who receive special education services. In asking whether parents had access to a few targeted resources in YCSD, such as additional information and resources about their child's disability, parents expressed mixed reviews about available family resources (Figure 5.13). While 58 percent of parents agreed that their child's school gives parents the help they need to play an active role in their child's education, roughly one-third or fewer of parents agreed that their child's school offers parents training on their child's curriculum (35%), connects families to other families to provide information and mutual support (34%), and connects parents to organizations that serve students with disabilities (30%).

Figure 5.13. Accessibility of Resources for Families of Students Receiving Special Education Services
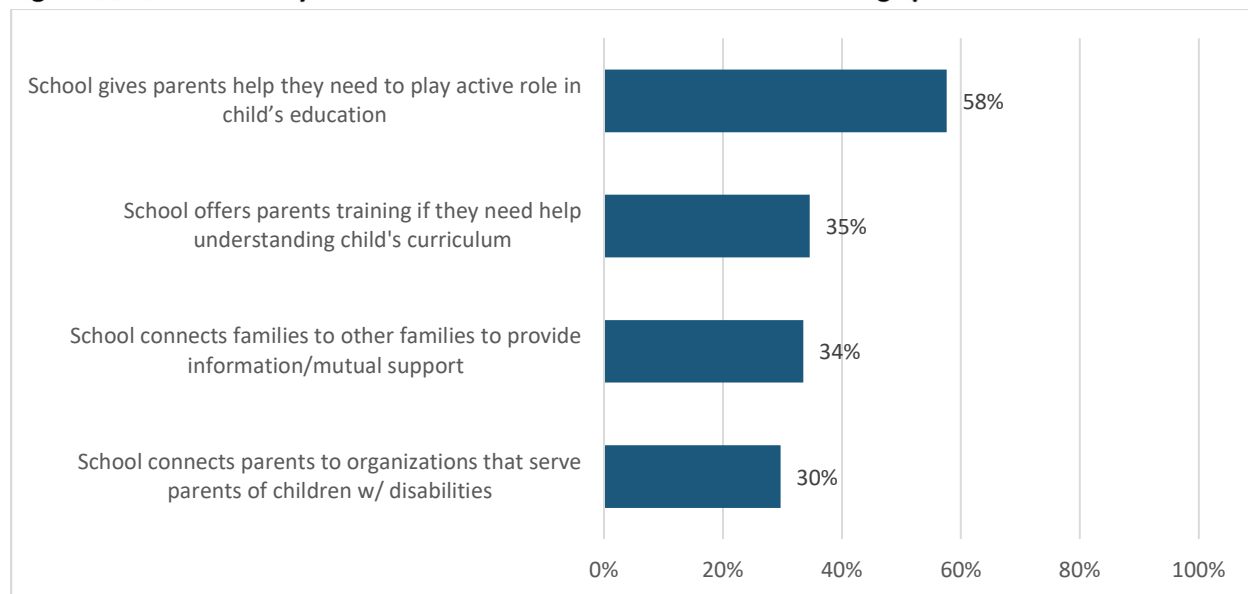
Source. Data from YCSD Parents of Students Receiving Special Education Services Survey, 2019.

*Note: This figure represents responses from 319 parents.

Parents of students with certain primary disabilities had more positive experiences accessing family resources (Figure 5.14). A larger proportion of parents of students with developmental delays agreed that their child's school offers each of the family resources asked about on the survey compared with parents of students with other primary exceptionalities. For example, 60 percent of parents of students with developmental delays agreed that their child's school offers parents training if they need help

understanding their child's curriculum, compared with 21 percent of parents of students with multiple disabilities. Similarly, just 25 percent of parents of students with speech or language impairments agreed that their child's school offers training to parents who need help understanding their child's curriculum.

Figure 5.14. Accessibility of Resources for Families of Students Receiving Special Education Services, Parent-Reported Student Primary Disability

Source. Data from YCSD Parents of Students Receiving Special Education Services Survey, 2019.

*Note: This figure represents responses from 308 parents, including parents who reported their oldest child's primary disability as autism (n=43), specific learning disability (n=41), speech or language impairment (n=17), other health impairment (n=38), developmental delay (n=6), multiple disabilities (n=66), and other (n=97). Parents who reported their child's primary disability as visual impairment, hearing impairment, traumatic brain injury, and intellectual disability are excluded from the figure due to small cell size (n<5).[7]

Beyond primary disability, perceptions of resources available to families of students receiving special education services varied by the reported grade level of the student. A somewhat smaller proportion of parents of middle school aged students agreed that their child's school offered each of the family resources compared with parents of students in elementary and high school. Figure 5.15 shows that just 24 percent of parents of middle school students agreed that their child's school offers training in their curriculum if parents need help to understand it, while 39 percent of elementary school parents and 41 percent of high school parents agreed.

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[7] Note that in some cases the N value for a disability category may represent a parent's response if their child qualifies for that disability as the either the primary, secondary, or tertiary disability.

Figure 5.15. Accessibility of Resources for Families of Students Receiving Special Education Services, Parent-Reported Student Grade Level

Source. Data from YCSD Parents of Students Receiving Special Education Services Survey, 2019.

*Note: This figure represents responses from 314 parents, including parents who reported their oldest child's grade was in Pre-K to 5th grade (n=102), 6th to 8th grade (n=76), and 9th to 12th grade (n=136).

Parent Involvement

Parents were also asked about the extent to which they participate in their children's schooling in a variety of ways, including asking their child about their day, engaging in learning activities, and participating in school related activities. Overall, parents expressed a high level of involvement in their children's educational lives (Figure 5.16). The majority of parents reported that they participate in their children's school lives to a great or moderate extent. Eight-in-ten parents said that they ask their child about their homework (81%) and what they are learning in school (80%) to a great extent. Half or more of parents reported that they engage with their child in learning activities at home (61%) and that they help their child with their homework (50%) to a great extent. About one-quarter of parents noted that they participate in school-sponsored events to a great extent. Another 44 percent of parents said that they participate in school activities to a moderate extent.

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Figure 5.16. Parent Involvement in Child's Educational Life

Source. Data from YCSD Parents of Students Receiving Special Education Services Survey, 2019.

*Note: This figure represents responses from 319 parents.

Appendix A: List of Interviews, Focus Groups and Campus Visits

Interviews

The review team conducted interviews with the following York County School Division staff:

- Victor Shandor, Ed.D., Superintendent

- Stephanie Guy, Ed.D., Chief Academic Officer

- Elaine Gould, Ph.D., Director of Student Services

- Candi Skinner and Anthony Vladu, Ed.D., Directors of ES and SS Instruction

- Christy Morgan, Coordinator of Student Services II

- Michael Spironello, Coordinator of Student Services II

- Frances Sorrell, Coordinator of Student Services II

- Valerie Wilson, Coordinator of Student Services I

- Dorothy Elizabeth Crockett, Ph.D., Coordinator of Student Services II

- Chiquita Seaborne, Coordinator of Student Services II

- Matthew Tayman, Behavior Support Specialist

- Sybil (Lisa) Randall and Kathy Stinton, Lead OT/PT and Lead SLP

- Bill Bowen, Chief Financial Officer

- James Carroll, Chief Human Resources Officer

- Aaron Butler, Ed.D., Director of School Administration

- Barbara Nagel, Principal Seaford Elementary School

- Mary Lugo, Principal Tabb Elementary School

- Shannon Butler, Ed.D., Principal York High School

Focus Group Sessions

The review team conducted the following group interviews; participants were randomly selected by Gibson Consulting Group, Inc. using a position roster provided by the York County School Division.

- Elementary Principals
- Secondary Principals
- Elementary Assistant Principals
- Secondary Assistant Principals
- Elementary General Education Teachers
- Secondary General Education Teachers
- Elementary Special Education Inclusion Teachers
- Secondary Special Education Inclusion Teachers
- Paraprofessionals (Elementary and Secondary Inclusion)
- LSSPs, OT/PTs, SLPs, and Social Workers

School Visits

The review team visited six schools. Schools visited were selected based on school level, academic performance, student demographics, and geographic location.

- Grafton Bethel Elementary School
- Magruder Elementary School
- Grafton Middle School
- Tabb Middle School
- Tabb High School
- York High School

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Appendix B: Literature Review

Summary

Deciding upon the best approach for implementing effective special educational practices has been a rich topic of discussion for schools and school districts for decades. Prominent approaches to special education services include specialized instruction via pull-out interventions, wholly inclusive education practices, and steps in between. An examination of literature concerning special education practices reveals several key facets for schools and school districts to consider. These include: effective instructional delivery, student placement and supports, staffing and resources, and parent engagement. The following presents a summary of the major themes gleaned from the literature review.

- Inclusive education practices show promise for positively influencing student outcomes, and identifying the least restrictive environment – the principle that students should be learning alongside their peers – in which special education services can be provided is a crucial aspect of ensuring that students are learning in the most inclusive environment possible (Kirby 2017; Rozalski et al., 2010; Weiss et al., 2018). For some students, this may mean placement in an alternative school, though more insight is needed into how schools make decisions regarding student placement into or out of alternative schools (Hoge et al., 2014). There are a wide array of inclusive practices for schools to pursue at appropriate levels of differentiated instruction for all students (Broderick et al., 2005) and maintain flexibility so as to meet changing student needs (American Speech-Language-Hearing Association, 2016). One common inclusive practice involves the use of pull-out programs. While pull-out programs are considered effective when combined with inclusion instruction (Marston, 1996), students that spend the largest part of their day leaving their classroom to receive special instruction can experience disconnected and fragmented days (Frattura and Capper, 2006).

- Teachers are vital to providing effective special education instruction. Some research suggests, however, that teachers make relatively few proactive modifications to meet the variety of learning abilities present in their classrooms (Tomlinson et al., 2003; Weiss et al., 2018). Successful implementation of inclusive educational practices, response to intervention programs, or any other effort to impact the quality of special education services, requires school-wide support for the initiative (Fisher and Frey, 2013; Feuerborn et al., 2015). Achieving building-wide support can be challenging without staff buy-in, leading to varied fidelity in the implementation of schoolwide positive behavior supports. Staff resistance to new or modified practices poses another challenge to the implementation of special education services. Considering this, it is important to understand that teacher self-efficacy (Daniels, 2018) and administrative support (Nierengarten, 2013) can impact implementation of inclusive education strategies.

- Teacher preparation programs may not be adequately preparing teachers for the challenges they will face with the range of special education students they may have in their classrooms (Bruce et al., 2008; Zagona 2017), or for collaboration between general and special education teachers (Da

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Fonte et al., 2017; Jones, 2012). Professional development may help teachers adjust to the wide ranging learning abilities of their students to a degree, particularly when professional development focuses on teachers' immediate classroom concerns and providing in-class follow-up support. Providing adequate supports to develop collaboration skills between general and special education teachers can also help teachers work with a broad range of learning abilities in the classroom, specifically through implementing inclusive education practices, such as co-teaching (Brown et al., 2013; Da Fonte et al., 2017; Friend et al., 2010; Hang and Rabren, 2009; Irvin et al., 2018; Strogilos and Avramidis, 2016). Educators who felt positively about educating students with disabilities in general education settings and working collaboratively also felt they had administrative support to effectively offer inclusive education programs (Idol, 2010), while another study indicated that administrative support played a role in developing a sense of competence in the care of special needs children (Esperat et al., 1999).

- Alongside teachers, parents play a crucial role in determining special education services. When parents are more involved with their child's learning, school adjustment behaviors (including hyperactivity, internalizing behavior, and externalizing behavior) for kindergarten and first grade students decrease, especially when parents speak with teachers on a regular basis (Badri et al., 2014). The importance of parent engagement in their child's educational life is especially crucial as part of the Individualized Education Program (IEP) development process (Yell et al., 2015). Parents involved in the IEP process have positive perceptions of their IEP meetings when they feel that their input is valued and when they are treated with respect and as equal decision makers, which can also impact parent understanding of the IEP process and special education law (Fish, 2008). When included in decision-making, parents can advocate for their students by providing needed insights into areas their students most need assistance, such as challenges in self-advocacy, managing emotions, and managing personal/adaptive skills (Elias and White, 2018).

- While more research is needed to include the perspectives of multiple stakeholders (parents and teachers) across disabilities, parents who have more frequent communication with schools tend to be more satisfied with their schools (Woods et al., 2018), which may be a result of teachers of younger students being more proactive in communication with parents. While collaborating with parents can be key, it is also valuable to recognize that parents are not always knowledgeable about all aspects of their student's disability (Reilly, 2012). Schools should provide parents with information, resources, and supports regarding both disabilities, special education law, and how to navigate processes related to special education.

- Beyond instructional services and approaches, staffing resources are a substantial consideration in what schools and districts can offer to students with disabilities. In particular, the consistency of staff providing special education services can impact the delivery of instructional services and education (Sulek et al., 2017). With many school districts facing a shortage of special education teachers (Cancio et al., 2013), schools and school districts should be aware of factors that can lead to teacher burnout and turnover, such as undergoing long periods of stress, which can result in feeling emotional exhaustion, depersonalization, and a lack of personal accomplishment (Brunsting et al., 2014). Special education teachers often have large caseloads, and in some

instances there is a disproportionate ratio of special education teachers to special education paraprofessionals (Suter, and Giangreco, 2009). Not only do factors such as these influence special education teacher burnout and turnover, but may also impact the quality of provided special education services. Administrative support, however, can play a role in teacher longevity, feelings of burnout, and intention to leave (Cancio et al., 2013; Brunsting et al., 2014; Conley and You, 2016).

Implementing effective special education services can be challenging for schools and school districts, given the breadth of student disabilities present in many schools. However, research indicates that providing students with a least restrictive environment to receive flexible, needs-specific inclusion education can positively impact student outcomes. Schools should work to achieve building-wide support for special education initiatives, particularly by ensuring that general and special education teachers are appropriately equipped to manage paraprofessionals and effectively collaborate with one another. Administrators should maintain a high level of support for their staff, as administrative support directly influences teacher longevity and job satisfaction; continuity of staff providing special education services impacts the effectiveness of delivery. Parents should be included in decision-making processes, as parent involvement can not only influence student behavior or provide insight into student needs, but parent understanding of and satisfaction with special education processes.

Data and Methods

References from this body of literature were gathered during a comprehensive literature review performed in spring and summer 2019. In addition to providing best practice evidence for the report findings and recommendations, this systematic review of special education research literature was used to help develop survey instruments and focus group protocols for this program review.

The literature review focused on the following key domains with nested sub-topics as identified by York County School Division (YCSD) project staff:

- Instructional delivery
- Classroom/student experience
- Continuum of services
- Behavior placements
- Student outcomes

The goal of this review is to provide salient and actionable information for district and school leaders within YCSD to better meet the needs of students receiving special education services. Below is a description of the data and methods used in the review.

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The literature review addressed the following general research questions:

- In what ways are special education services delivered in general education classrooms?

- To what extent do general and special education teachers feel supported to meet the needs of students receiving special education services in their classrooms?

- To what extent do current behavior placements and systems found in special education literature impact student outcomes?

- To what extent are co-teaching models effective in supporting students with disabilities throughout existing literature?

- What types of mediators within special education literature drive parent satisfaction?

Special education services were defined using the definition of related services under the Individuals with Disabilities Education Act (IDEA)[1]: "*transportation and such developmental, corrective, and other supportive services as are required to assist a child with disabilities 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*." Student outcomes were defined as academic performance, behavior performance, and functional performance.

Studies were considered relevant for the review if they met the following criteria:

- Published in a peer-reviewed journal

- Conducted primary research (some meta-analysis)

- Published in 2006 or later[2]

- Within the education field

- Studies conducted in schools/districts

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[1] Individuals with Disabilities Education Act, 20 U.S.C. § 300.34 (2004).

[2] Six journal exceptions were made.

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The following 38 keywords were used during the database search portion of the review:

Assistive technology	Parent satisfaction
Autism	Quality of special education program
Behavior intervention	Response to intervention
Behavior supports	RTI
Collaboration	Special education referrals
Communication	Service delivery
Continuum of services	Service delivery model
Co-teaching	Service minutes
Culture and climate	Special education
Effectiveness of program	Special education services
Employee engagement	Special education students
Evaluation of special education	Specialized instruction
General education	Staff engagement
Inclusive	Staff burnout
Individual Education Program	Students with disabilities
Least restrictive environment	Teacher
LRE	Teacher perception
Out of school placement	Teacher satisfaction
Paraprofessional	

A database searched identified 30,000 journal articles that included the keywords that the review team developed. When these 30,000 articles' abstracts were screened against the review criteria, 125 passed the criteria for inclusion. Twelve review articles from the What Works Clearinghouse site specifically relating to special education intervention programs, and five articles relating to special education policy and laws were included. While the inclusion criteria focused on articles published after 2006, the review team included six pertinent journals articles published between 1990 and 2005. Overall, a total of 142 articles were included in the final review of literature.

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Appendix C: Individualized Education Program File Review

All children with disabilities, regardless of the type or severity of disability, have a right to a free and appropriate public education (FAPE) and it must be provided at public expense. An important part of the FAPE requirement is an Individualized Education Program (IEP) for each student. The IEP must articulate the student's unique needs, present levels of performance, measurable goals and objectives, and a description of the special education and related services that will be provided so that the child can meet his or her goals and learning objectives. As described in Public Law 108-44637[1], the legally required components of the IEP are:

- A statement of the child's present levels of academic achievement and functional performance;

- A statement of measurable annual goals and how progress toward meeting the annual goals will be measured;

- Benchmarks or short-term objectives for students with disabilities who take alternate assessments aligned to alternate achievement standards;

- A statement of the special education and related services and supplementary aids and services, based on peer-reviewed research to the extent practicable, to be provided to the child, or on behalf of the child;

- Frequency for reporting the student's progress to parents;

- A statement of any individual appropriate accommodations that are necessary to measure the academic achievement and functional performance of the child on State and division-wide assessments;

- Opportunities to participate in extracurricular and nonacademic activities;

- Instructional setting and length of student's school day including the extent to which the child will not participate with nondisabled children in the regular classroom;

- Beginning not later than the first IEP to be in effect when the student turns 16, or younger if determined appropriate by the IEP committee, the IEP must include a statement of transition services needs and must include appropriate measurable postsecondary goals based upon age appropriate transition assessments related to training, education, employment, and, where appropriate, independent living skills and the transition services needed to assist the child in reaching these goals;

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[1] https://www.copyright.gov/legislation/pl108-446.pdf.

- Beginning not later than one year before the child reaches age 18, a statement that the child has been informed of his/her rights and that those rights will transfer to the child on reaching the age of majority;

- Transportation needed to access services; and,

- A determination about the need for extended school services needed for the child to make progress in the general education curriculum.

The IEP must be reviewed at least once a year by the IEP team to determine if the child is achieving the annual goals. The IEP team must revise the IEP to address:

- any lack of expected progress;

- results of any reevaluation;

- information provided by the parents; and,

- anticipated needs.

Methodology

The primary objective of the IEP file review was to assess whether or not IEPs are compliant, of high quality, and follow best practice standards. In general, a quality IEP is in compliance with all requirements of state and federal laws and regulations and provides a clear statement of expected outcomes and the special education services and supports to be provided to the student.

The review team conducted a detailed review of 25 student IEPs, which represents approximately 0.1 percent of YCSD's special education students. Selection of individual students was random, but specific criteria were used in order to ensure that the sample size was somewhat representative of school level and primary disability types. Information contained within the IEPs was accessed utilizing Virginia IEP, a browser-based data management software that tracks services for students with disabilities along with compliance.

Tables C.1 through C.4 provide a summary of the IEPs reviewed. Data are presented separately to protect the identity of students. The grades represented in the IEP file review are shown in Table C.1.

Table C.1. IEP File Review by Grade Distribution

Grade	Count
PreK	1
K	4
1	2
2	1
3	1
4	2
5	0

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Grade	Count
6	1
7	3
8	2
9	1
10	4
11	1
12	2
Total	25

Table C.2 indicates the school for each student whose IEP file was reviewed. Five of the students below are being served in the following private day schools: 3 are at Newport Academy at New Horizons, 1 is at Peninsula School at Faison Center, and 1 is at Plan Bee Academy.

Table C.2. IEP File Review by Campus

Home Campus	Count
Bethel Manor Elementary	1
Coventry Elementary	1
Dare Elementary	1
Grafton Bethel Elementary	2
Magruder Elementary	2
Mount Vernon Elementary	1
Tabb Elementary	2
Yorktown Elementary	1
Grafton Middle	3
Queens Lake Middle	3
Bruton High	3
Grafton High	2
Tabb High	3
Total	25

Table C.3 identifies the primary disability of students whose IEP files were reviewed.

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Table C.3. IEP File Review by Primary Disability

Primary Disability	Count
Autism	6
Emotional Disability	2
Hearing Impairment	1
Intellectual Disability	1
Multiple Disabilities	2
Other Health Impairment	6
Specific Learning Disability	3
Traumatic Brain Injury	1
Developmental Delay	3
Total	25

*Students with Speech/language Impairment as a primary disability were excluded from the sample selection.

Table C.4 identifies the percent of time in a regular education class for the student whose IEP files were reviewed.

Table C.4. IEP File Review – Percent of Time in Regular Education Class

Percent of Time in Regular Education Class	Count
Preschool	
Regular Early Childhood Program	1
Separate Special Education Class	0
School-Aged	
Regular Class 80% or More of the Day	3
Regular Class 40-79% of the Day	11
Regular Class Less than 40% of the Day	5
Separate Public or Private School	5
Total	**25**

IEP Evaluation Rubric

In addition to the federal requirements outlined previously, Table C.5 presents additional elements that were used to evaluate the quality of each IEP.

Table C.5. IEP Evaluation Criteria

Component	Criteria
Annual Revision Timeline	IEP is reviewed at least once/year by the IEP team.
	Reevaluations occur at least every 3 years.
PLAAFP	A statement of the child's present levels of academic achievement and functional performance that includes:
	▪ Learning preferences
	▪ Limitations or impediments to learning

Component	Criteria
	▪ Objective data from current evaluations and/or progress monitoring
	▪ Information on how the disability impacts involvement and progress in the general education curriculum
	▪ A Description of benchmarks or short-term objectives if an alternate assessment is taken
	▪ A variety of assessments were used
Least Restrictive Environment Justification	A justifiable reason is given for removing the student from classes with non-disabled peers.
Quantifiable and Measurable Goals Aligned with Grade Level Standards	Goals for academic and functional skills should:
	▪ Be directly connected to the data provided in the PLAAFP
	▪ Name the skill or subject area and the targeted goal
	▪ Be stated in a way that progress can be measured by standardized tests, curriculum-based measurements or screening
	▪ Specify progress that is attainable
	▪ Clearly state what the student needs to do to accomplish the goal
	▪ Include a time frame for achievement with the right services
	▪ Specify who will measure progress and when and how often progress will be measured
	▪ Include short-term objectives for students who take alternate assessments
Appropriate Levels of Support and Accommodations	The supports are appropriate given the needs of the student identified in the PLAAFP, accommodations, annual goals, and special education services.
	Describes specially designed instruction, related services, supplementary aids and services, program modifications for school staff, and accommodations in assessments if needed.
	Have a documented need indicated in the PLAAFP.
	The number of accommodations and/or support are such that their effect can be tracked and measured in order to adjust as needed.
Inclusion of Behavior Intervention Plan (BIP), If Appropriate	If IEP reveals behaviors that interfere with the student's learning or that of others, a FBA should be in the file and a BIP based on the FBA should be included and should consist of:
	▪ Targeted behaviors
	▪ Consequences reasonably calculated to improve behavior given for each targeted behavior
	▪ Person responsible for implementation of BIP
	▪ Operational definition
	▪ Desired replacement behavior
	▪ Methods to measure weekly progress
	▪ Positive strategies/supports/interventions to use when behavior is occurring
	▪ Reinforcer(s)
	▪ Classroom environment

Component	Criteria
	▪ Classroom strategies
	▪ Reward system
	▪ Social skills training
Consideration of Need for Assistive Technology	Documentation that the need for assistive technology was considered; any functional capabilities noted in the IEP should be considered for AT enhancement.
	Note if AT recommended is low, medium, or high tech.
Consideration of Need for ESYS	Documentation that ESYS was discussed and that there was no critical area addressed in the current IEP goals and objectives that the student might be expected to exhibit severe or substantial regression that cannot be recouped within a reasonable period of time.
Provision of Related Services, if Appropriate	A statement of the special education and related services and supplementary aids and services to be provided to the child, or on behalf of the child.
	The frequency and duration of the services is identified.
	The need for services is identified in the PLAAFP.
Determination of Participation in State and District Assessments	Functional level and disability of the student aligns with the decision to provide an alternate assessment. Accommodations used in the classroom should also be provided for state and district assessments if allowable.
Transition Plan	All students age 16 or later have a transition plan Plans includes:
	▪ Age-appropriate transition assessments for strengths, interests, preferences, and needs in the areas of employment, training, education, and independent living;
	▪ Appropriate measurable postsecondary goals based upon age-appropriate transition assessments related to training, education, employment, and, where appropriate, independent living skills;
	▪ The transition services (including courses of study) needed to assist the child in reaching those goals;
	▪ Annual goals related to transition needs;
	▪ No later than one year before the student reaches the age of majority under State law, a statement that the student has been informed of their rights under Part B of the Act that will transfer to the student on reaching the age of majority
Progress Reports	Give measurable progress toward accomplishment of IEP goals.
	Provided at least every grading period.

Source: Gibson Consulting Group.

IEP Review Results

In large part, all of the IEPs reviewed addressed the federal requirements; however, there were some observations made related to the overall quality of the IEPs. The observations from the IEP review are used to support more specific findings and recommendations discussed in other chapters of this report. The results of the review team's IEP file review are outlined below.

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Annual Revision Timeline

Three of the IEP files reviewed failed to meet the required annual review timeline and one additional file had a gap between IEPs that was not explained (i.e., the student transferred from another school division and had an IEP that expired several months before the new IEP in YCSD began; the date the student actually enrolled in YCSD was not available in the file). Further, the VA IEP system sends regular notifications of timeline deadlines which are approaching or have been missed. A report generated from the VA IEP system by the review team on July 10, 2019 revealed that 44 students had IEPs whose evaluations were overdue (Figure C.1). YCSD management reports that these reports are received and reviewed often by the Office of Student Services, and that students identified in the Virginia IEP system as having overdue IEPs are generally due to students are inactive in the Division's student information system, and students having signed IEPs in the file but the student information system has not yet been updated. These reasons are further examples of potential data integrity issues (described previously).

Figure C.1. Count of Students with Overdue IEP Evaluations (Screenshot)
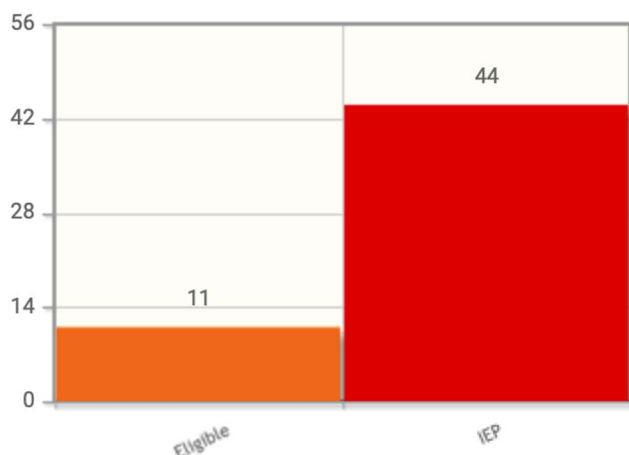
Source: VA IEP report for YCSD dated July 10, 2019.

Recognizing that the needs of a student with a disability changes over time, the IDEA provides that a school division must conduct a reevaluation if it determines that "the educational or related services needs, including improved academic achievement and functional performance, of a child warrant an evaluation or upon parental or teacher request."[2] The IDEA and its implementing regulations require a reevaluation every 3 years, but the reevaluation does not have to take place if both the school division and parents agree it is unnecessary.[3] For 24 students included in the review, three-year reevaluations had been conducted within the required three-year period. For one student placed at Newport Academy, a reevaluation date was noted but it was not included in the file.

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[2] 34 CFR 300.303(a).

[3] 34 CFR 300.303(b)(2).

Present Levels of Academic Achievement and Functional Performance

Among other criteria, a well-written Present Levels of Academic Achievement and Functional Performance (PLAAFP) statement will describe and/or include: student strengths and weaknesses; learning preferences; limitations or impediments to learning; objective data from current evaluations and/or progress monitoring; information on how the disability impacts involvement and progress in the general education curriculum; and, a description of benchmarks or short-term objectives if an alternate assessment is taken. A PLAAFP should be written so that a stranger could read it and have a general understanding of who the student is and what their capabilities and needs are.

In three of the files reviewed, there was particularly strong anecdotal information about the student, giving a clear image of who they are. This is important when students are transitioning from one teacher to another at the change of a semester or school year, but especially when the student is transitioning to a new school.

All files had good "descriptive" information regarding the students' abilities. There were, however, several areas of concern in the PLAAFPs of files reviewed, which are described below:

Objective data from current evaluations and/or progress monitoring:

- One file contained age level equivalencies for skills but did not have any performance measures. Monitoring progress is impeded by the lack of present levels of performance.

- One file had extremely limited data to support progress monitoring.

Assessments and how they were used to determine student strengths and areas of need:

- One file contained no assessment data.

- One file contained only a written description of a single observation.

- One file only contained Woodcock-Johnson assessment scores.

- One file did not reference IQ testing.

- One file contained only grades and Standards of Learning (SOL) scores.

Information on how the disability impacts involvement and programming in the general education curriculum:

- One file contained age level skills of the student but no measures of performance.

- One file did not address this at all.

Justification for the Least Restrictive Environment

To receive Part B funds under the Individuals with Disabilities Education Act (IDEA) states must have in place procedures assuring that, *"to the maximum extent appropriate, children with disabilities, including children in public or private institutions or other care facilities, are educated with children who are not*

disabled, and that special classes, separate schooling, or other removal of children with disabilities from the regular educational environment occurs only when the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily.[4] The intent of the law clearly is a strong preference for educating students with disabilities in regular classes with appropriate aids and supports.

Of the 25 files reviewed, one did not contain clear justification for the student's placement in the LRE. It is important to note that inclusion in general education classes is not always the best placement to ensure progress is made. One student file recorded a parent request during two academic years for their second-grade child to receive reading and math instruction in a resource room rather than in a general education classroom yet the student continued to receive instruction in the general education setting. The student's PLAAFP identified the student's abilities as stating their own first name, naming pictures of some common objects, remembering people's names, and asking questions and expressing their needs. IEP teams need to ensure placement enables students to receive appropriate teaching and learning experiences to enable maximum progress to be made.

Quantifiable and Measurable Goals Aligned with Grade Level Standards

IEP goals should be based on measures found in the PLAAFP and should map a plan for students to progress in academic, motor, social, and behavioral areas. Goals should be:

- *Specific:* Name the skill or subject area and the targeted goal.

- *Measurable:* The goal should be stated in a way that progress can be measured by standardized tests, curriculum-based measurements or screening.

- *Attainable:* The goal should represent progress that is realistic.

- *Results-oriented:* The goal should clearly lay out what students need to do to accomplish the goal.

- *Time-bound:* The goal should include a time frame for achievement with the right supports and services. It should also state when and how often progress will be measured.

Training for teachers should promote these features to ensure goals and objectives are appropriately written. While not a requirement, objectives may be written into the IEP along with the goals. There is a requirement, however, that if a student will take an alternate statewide assessment based on Virginia Alternate Achievement Standards (VAAP), all of the student's annual goals must include short-term objectives. Objectives are short-term benchmarks, or milestones, that can be used to measure a child's progress toward the bigger target—the goal. As such, the timeframe for accomplishment of short-term objectives should be less than the timeframe for the annual goal. An example of this would be the following:

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[4] Source: IDEA 20 USC 1412(5)(B), Department regulations 34 CFR 300.550-300.556.

- *Goal* – In 36 instructional weeks using decoding skills and oral practice within a 3rd grade passage, [student name] will read 70 words per minute with fewer than 10 errors.

- *Objective* – By the end of the first six weeks using decodable texts [student name], a 3rd grade student, will read and pronounce 50 frequently used words with 10 or fewer errors.

Ten of the 25 files reviewed indicated students would take an alternate statewide assessment. In these 10 files, the timeframe for accomplishment of the objectives was the same as the timeframe for the annual goal. To properly measure progress toward accomplishment of goals, IEP teams will need to establish incremental measurement periods during the year, most logically, when report cards are issued. Elements found among the 25 files reviewed include the following:

Annual goals should be based on the PLAAFP:

- One file contained goals that were unrelated to what the student could do and what he/she needed to be successful as identified in the PLAAFP.

Academic goals should be standards-based:

- All files contained goals that were identified with Virginia SOL.

All goals should be measurable and include a timeframe to achieve the goal, conditions needed to accomplish the goal, the behavior being monitored, and the criteria needed to demonstrate the goal has been achieved:

- Two files contained no duration for measurement of the goal (i.e., behavior will be measured for a period of 10 minutes, behavior will be measured for 5 trials).

- One file had goals that were not able to be measured (i.e., behavior will improve, defiance will decrease).

- Four files did not identify the frequency for measuring progress (i.e., behavior will be measured one time per week, behavior will be logged daily).

- One file indicated that the student should accomplish all goals at 100 percent, which is unlikely even for a student without a disability.

Use of the Virginia IEP system is fairly new for YCSD; therefore, the files did not contain a history of all IEPs. In one case, however, a student's IEPs beginning with 2015-16 were included. A review of goals over the five years indicated that the goals for reading and writing for this student had remained unchanged each year including 2019-20 goals.

Appropriate Levels of Support and Accommodations

Accommodations allow a student equal opportunity to access the general curriculum and demonstrate what they know and are able to do without modifying the curriculum or assessment. Accommodations

may be changes to the environment, instruction, or assessment and should be aligned with data provided in the PLAAFP. Accommodations should be reasonable (i.e., made with minimum of preparation or change) and effective (i.e., enable student to become more independent).

The types of supports and accommodations students with disabilities can receive are specially designed instruction, related services, supplementary aids and services, program modifications for school staff, and accommodations in assessments. All student files contained varied amounts of direct and indirect support to be provided to students. All files contained accommodations that were specific and included multiple options.

A template was found in most files reviewed that included accommodations/modifications, frequency, location, instructional setting, and duration. The Division is to be commended for providing the template which ensures IEP teams address appropriate supports and accommodations for each student.

The different types of levels of support and accommodations included the following:

- 2:1 staff support – 1
- Academic Lab – 5
- Adapted Physical Education – 1
- Applied Behavior Analysis – 1
- Behavior support or management – 7
- Counseling – 1
- Occupational therapy – 1
- Physical therapy – 1
- Project Explore – 2
- Social skills – 5
- Speech and language therapy – 5

This variety of services indicates that IEP teams offer supports and services that students need to be successful.

Tracking the effectiveness of accommodations is important; therefore, including large numbers of differing methods of supporting students may preclude reasonable monitoring of effectiveness of individual accommodations. Seven of the files reviewed had more than 10 accommodations/supports, which would require large amounts of time to monitor and adjust throughout the school year. One file had 23 different accommodations which would be extremely challenging to monitor appropriately.

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Inclusion of Behavior Intervention Plan, if Appropriate

When an IEP team determines that a student's behavior impedes his/her own learning or that of others, a functional behavioral assessment (FBA) should be conducted. An FBA is a part of the positive behavioral support (PBS) mandated by IDEA 2004. FBA is a process which describes a student's disruptive behaviors, looks for the reasons behind the behaviors and offers interventions that teach new behaviors to replace the undesired ones. The FBA team forms a hypothesis about possible deficits and causes for the behavior and tests this by creating variations in the learning requirements and environment to see if and how the student responds. If the intervention is not effective, the team may create a behavior intervention plan.

The BIP targets one to three of a student's undesirable behaviors with interventions that are linked to the functions of the behavior; each intervention specifically addresses a measurable, clearly-stated targeted behavior. A BIP can include prevention strategies, which stop the behavior before it begins, as well as replacement behaviors, which achieve the same function as the disruptive behavior without causing disruption. The environment is considered, and the FBA/BIP team may determine that a change in a student's schedule or in the arrangement of his or her classroom is called for. In addition, the BIP provides a plan for responding to the old behavior that is being replaced and promoting the new behavior.

Three of the files reviewed contained FBAs and BIPs. The Division did not have system access to the student files and the review team accordingly had to request hardcopies of the FBAs and BIPs for those students placed at Newport Academy. The BIP template used by YCSD contained all the elements required for legally defensible BIPs:

- precursors/antecedents
- problem behaviors including setting/environment and baseline data
- alternate/desired behaviors
- changes to the environment or setting event
- teaching alternate/replacement skills or social skills training
- reinforcement/positive consequences when desired behaviors are demonstrated
- response to undesired behaviors/corrective feedback
- behavior reduction strategies
- plan for crisis support
- team member responsibilities
- support for team members
- data collection systems

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One of the BIPs failed to note when or how behaviors would be measured and there was no mention of social skills training. One BIP failed to include methods to measure weekly progress and did not indicate how the classroom environment could be modified.

Among the 22 files with no BIPs, there was information that appeared to support the need for behavior goals or a formal plan for behavior management for two students. In the PLAAFP of one of the students, it was noted that the student's behavior impeded their learning or the learning of others. The student was prone to elopement and impulsivity and required staff to hold their hand at all times. The student had two behavior goals but no FBA or BIP. One other student had goals for self-injury, compliance, and safety, but no FBA or BIP.

Other students with notable behavior problems addressed through behavior goals rather than BIPs included these behaviors:

- Refusal to comply, hitting, tantrums.

- Inability to work independently; remaining attentive, focused, and organized; need for frequent redirection and cues to begin work; defiance and resistance to help resulting in poor choices. Behavior goals only addressed complying with rules 100 percent of the time.

- Crying, screaming, hitting staff, throwing objects. There was one behavior goal to increase on-task behavior.

- Singing impedes the learning of others.

An FBA and BIP would more appropriately address the behaviors indicated above than behavior goals.

Two student files indicated the need for a BIP in the past but that there was no longer a need. One of those student's placement had been changed from resource to self-contained. One file indicated that a student was placed at Plan Bee Academy as a result of a single incident. The student had one behavior goal but no BIP.

Consideration of Need for Assistive Technology

IDEA defines assistive technology (AT) as "any item, piece of equipment, or product system, whether acquired commercially off the shelf, modified, or customized, that is used to *increase, maintain, or improve functional capabilities of a child with a disability*." Decisions regarding the need for assistive technology devices and services are made based on a student's ability to access the curriculum and/or their IEP goals and objectives. Five students in the sample had AT provided. Table C.6 illustrates the distribution among the students in the files reviewed.

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Table C.6. IEP File Review, Assistive Technology

Type of AT	Count	Description
Low	1	Picture Exchange Communication System (PCES)
Medium	0	N/A
High	4	Voice output device, grapho-motor output tools, personal FM system, hearing aids, Proloquo2Go symbol-based speech generating app, iPad

A second grader whose disability was ID and OHI was identified as having severe communication needs, yet consideration of the need for assistive technology was not indicated on the IEP Team Considerations form.

Consideration of Need for Extended School Year Services

Extended School Year Services (ESYS) is an Individualized Education Program for children with disabilities that are provided to some students beyond the regular school year. ESYS must be considered and addressed at the student's annual IEP meeting. The need for ESYS must be discussed on an individual basis by the child's IEP Team from formal and/or informal evaluations provided by the assessment team, special education staff and/or the parents. The documentation must demonstrate that in one or more critical areas addressed in the current IEP goals and objectives, the child has exhibited, or may be expected to exhibit, severe or substantial regression in critical skill area(s) that cannot be recouped within a reasonable period of time.

Three files reviewed included the provision of ESYS in varying degrees. A single file included the statement that ESYS was not needed because the out-of-division placement was year-round. The Division has developed an ESYS Eligibility worksheet that was found in only one of the 25 files reviewed. The justification for not providing ESYS in many files was either omitted or did not include any language regarding critical skills or regression and recoupment. Language used in the files is shown in Table C.7.

Table C.7. IEP File Review, ESYS Justification

ESYS Justification	Count
Does Not Qualify	1
Does Not Require	2
Does Not Meet Criteria	1
Not Enough Data to Support Need	1
Determine at a Later Date	3
Total IEPs with ESYS Justification	**8**

Provision of Related Services, if Appropriate

Table C.8 shows the related services that are provided to students whose IEPs were reviewed. Although some of the IEPs mentioned emotional difficulties which may have qualified them for psychological or counseling services, none of these students are receiving related services in these areas. Since IDEA

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requires that students with disabilities be provided with any supportive services needed to benefit from their special education, it is incumbent upon school divisions to consider a variety of services.

Table C.8. Number of Students in IEP Review Sample Receiving Related Services

Related Service	Count
Speech and Language Therapy	7
Occupational Therapy	5
Transportation	3
Physical Therapy	2

There were no findings related to the above related services. However, other related services provided by school divisions include psychological consultation/services, counseling, and medical/health services.

Determination for Participation in State and Division Assessments

The Every Student Succeeds Act (ESSA) requires that students with disabilities participate in the same academic assessments as all other students, with only one limited exception for those students with the most significant cognitive disabilities. This means that the vast majority of students with disabilities should take the academic assessments. Additionally, ESSA requires states to provide the appropriate accommodations, such as interoperability with, and ability to use, assistive technology, for students with disabilities, including students with the most significant cognitive disabilities and students covered under Section 504 of the Rehabilitation Act, that are necessary to measure the academic achievement of such children. IEP teams are charged with determining if any adjustments need to be made to state assessments to ensure all students participate.

All students in tested grade levels and courses are expected to participate in Virginia's assessment program, unless specifically exempted by state or federal law or by Board of Education regulations. Students with disabilities may take SOL tests with or without accommodations or they may be assessed through alternate or alternative assessments. The VAAP is an alternate assessment based on alternate achievement standards and is specifically designed to evaluate the achievement of students with significant cognitive disabilities. The VAAP is available to students in grades 3-8 and high school who are working on academic standards that have been reduced in complexity and depth. These academic standards are called Aligned Standards of Learning (ASOL) and are available in reading, writing, mathematics, science, and history/social science. Only students with significant cognitive disabilities who are eligible under IDEA and who meet the VAAP guidelines for participation may be assessed through the VAAP. Students will compile a collection of work samples to demonstrate achievement on the ASOL.

Transition Plans

In Virginia, beginning not later than the first IEP to be in effect when the child turns 14, or younger if determined appropriate by the IEP Team, and updated annually, thereafter, the IEP must include:

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- appropriate measurable postsecondary goals based upon age-appropriate transition assessments related to training, education, employment, and independent living skills, where appropriate; and,

- transition services (including courses of study) needed to assist the child in reaching those goals.[5]

Postsecondary goals must be based upon the results of age-appropriate transition assessments. Transition assessments are measures that facilitate a "*planned, continuous process of gathering and organizing information on the student's strengths, needs, preferences and interests in relation to the demands of current and future living, learning, and working environments*".[6]

IDEA specifies four categories around which data are collected: training, education, employment, and independent living. Information generated around these four areas allows IEP teams to design postsecondary goals and corresponding transition services for a given student in all arenas of adult life.

Ten of the files reviewed included students who were eligible for transition services and all included a transition plan. There were some deficiencies in the plans reviewed, which are listed below:

- Four of the files included insufficient transition assessments; most of these students had only been given one assessment or inventory or had participated in an assessment interview.

- Two files included no transition assessments.

- One file contained no transition goals.

- The amount of transition services/activities in most files was limited. Six files listed only one transition service and one had the course of study as the only activity.

Progress Monitoring

Progress monitoring is a scientifically based practice used to assess a student's academic progress on IEP goals and evaluate the effectiveness of instruction. Data collected informs teachers on what students have learned and what remains to be taught. Progress of students with disabilities must be reported to parents at least as often as the progress of non-disabled students is reported. In YCSD, progress reports are sent to parents eight times per year. Table C.9 reflects the mastery of goals and objectives identified in IEP progress reports.

Table C.9. IEP File Review, Mastery of Goals and Objectives

Mastery of Goals/Objectives at End of IEP or EOY	Count
0 Goals Mastered	15
0 Goals, 1 Objective/Benchmark	2

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[5] IDEA 2004 §300.320(b) (1)(2).

[6] Sitlington, P. L., Neubert, D. A., Begun, W. H., Lombard, R. C., & Leconte, P. J. (2007). Assess for success (2nd ed.). Thousand Oaks, CA: Corwin Press.

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Mastery of Goals/Objectives at End of IEP or EOY	Count
2 Goals	2
3 Goals	3
7 Goals	1
15 Objectives	1
All Goals and Objectives, Except 1	1

In addition to the numbers reflected in Table C.9 above, one student's file had no IEP progress reports included after September 2017. Another reported progress that was not measurable (e.g., continue to work on writing complete sentences with proper capitalization, spelling, and punctuation).

Sixty (60) percent of the files reviewed showed no mastery of a single goal or objective. This indicates that goals and objectives may not being written correctly. If a student cannot master a skill in a year's time, the skill should be broken down into smaller increments to enable the student to reach the final goal (i.e., recognize 3 letter symbols and their sounds then draw the symbol and select 4 words beginning with those sounds out of 8 pictures instead of learn all letters).

Appendix D: Classroom Observation Protocol

School	
Teacher(s)	
Classroom Type	
Grade Level	
Subject/Course	

Rating Scale:

S = Strong

M = Moderate

W = Weak

Provide a brief description of classroom activities, including but not limited to, instructional model, the number of teachers and para-educators, grouping of students, use of technology, etc.		
Observation "Look-For"	**Rating**	**Description**
Lesson Plan		
Students On-task		
Teacher Role		
Para-educator Role		
Curriculum		
Instructional Technology		
Assistive Technology		
Classroom Location		
Other		

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Appendix E: Online Staff Survey Methodology and Instrument

Instrument Development

To better understand how special education services are offered throughout York County School Division (YCSD), the review team developed a survey instrument that focused on several key areas: 1) Satisfaction with special education identification, placement, and service delivery; 2) Specialized instruction and inclusion; 3) Teaching supports and collaboration; 4) Professional development; 5) Job satisfaction and responsibilities; and 6) Organizational support. Relying on existing survey items from best practices research in special education, the review team drafted survey instruments accounting for YCSD needs and concerns. Survey items largely came from existing research in the fields of special education and organizational psychology (AIR; Beamish 1999; Caputo and Langher 2015; Feuerborn et al. 2014; Hang and Rabren 2009; Jackson et al. 2018; Kalinowski 2010; Kratz et al. 2015; Martin et al. 2016; Ogirima 2017; Richmond et al. 2001; TALIS 2018).

In addition to substantive feedback about division services and processes, and job satisfaction and environment, the survey asked staff to self-report some information related to their role within the division, including years of service in education and YCSD, whether they provided instructional services, and the primary grade level of students with which they work.

Description of the Sampling Frame and Survey Administration Process

The review team emailed the online survey link to YCSD faculty and staff using contact information provided by YCSD.[1] Faculty and staff eligibility for inclusion in the survey sampling frame was determined by whether an employee had either a direct role in delivering instructional services, supports, or instruction to students with disabilities or indirectly helped lead, support, or implement special education services as of March 5, 2019.

An email invitation was sent to each faculty and staff member in the sampling frame. The data file YCSD provided to the review team contained 2,409 unique faculty and staff members who were employed by YCSD on the eligibility determination date. The file contained staff contact information, including name and email address, along with campus and role indicators for each employee. Using these campus and role identification codes, the review team worked with YCSD to determine which division employees were

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[1] The survey was hosted on the Qualtrics platform.

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tied either directly or indirectly to instructional services for students receiving special education services. Ultimately, 1,610 faculty and staff were determined to meet this description.[2]

The survey window opened on April 15, 2019 and closed on May 3, 2019. During this time, the review team monitored response rates and sent reminder emails to those who had not completed a survey. Ultimately, the review team extended the deadline to allow for more responses and officially closed and downloaded the responses on May 7, 2019.

Survey Response Rates and Respondent Characteristics

Faculty and staff submitted a total of 1,082 surveys of the 1,610 surveys sent, yielding a 67 percent overall response rate. Respondents sometimes skipped survey items, and several items in particular were only relevant for instructional staff. As such, the number of responses to each survey item varied between 549 and 1,076, but was greater than 900 for most items.

Using data from both administrative data and the faculty staff survey, the review team compared the characteristics of the responding faculty and staff who serve students receiving special education services in YCSD, regardless of whether they returned a staff survey.

Table E.1 illustrates that the faculty and staff who responded to the survey were somewhat different from the population of faculty and staff who serve students receiving special education services. Of those who directly or indirectly serve students receiving special education services, 59 percent were non-special education teachers, compared with about 53 percent of respondents who fit this description. A slightly larger proportion of special education teachers, school leaders, and para-educators and support staff completed the survey when compared with the population of faculty and staff that serve students with disabilities. A larger proportion of full-time employees completed the survey when compared with the population – 95 percent of the responding sample were full-time employees compared with 85 percent of the population.

Table E.1. Representativeness of Survey Respondents to the Population of Faculty and Staff who Serve Students Receiving Special Education Services in YCSD

Group	Division Population	Survey Sample	Percentage Point Difference
Faculty/Staff Role			
Special Education Teacher	6.3%	8.8%	+1.5
Non-Special Education Teacher	59.0%	52.5%	-6.5
School Leader	13.2%	15.8%	+2.6
Para-educators/Support staff	17.9%	19.5%	+1.6
Division Staff	3.5%	3.4%	-0.1

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[2] Of the 799 staff members who were excluded from the staff survey effort related to special education services, the majority provided transportation services to the Division, though this also included maintenance and custodial staff, accounting and HR support, computer systems and information technology support, and food services.

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Group	Division Population	Survey Sample	Percentage Point Difference
Full Time			
Full time	85.0%	94.6%	+9.6
Part time	15.0%	5.4%	-9.6
Teacher Education			
Bachelors	22.9%	24.7%	+1.8
Masters	39.5%	42.9%	+3.4
Doctorate	2.7%	3.2%	+0.5
Missing	34.8%	29.2%	-5.6

Staff Survey Instrument

First, please tell us a bit about your role in York County School Division (YCSD) this school year (2018-2019). If you are a respondent who works for the school board/central office, please answer the following questions about all schools in your division that you work with.

Which of the following best describes your role in York County School Division during the 2018-19 year?

- School Board Office or Campus Administrator
- Certified special education teacher
- Non-certified special education teacher
- General education teacher
- Special education paraprofessional or classroom aide/assistant
- Licensed special education service provider (OT, PT, Social Worker, School Psychologist, SLP, etc)
- Other school or division staff (not listed above)

For the 2018-19 school year, do you ever provide direct services or instruction to students with disabilities?

- **Yes**, this is my primary role/responsibility.
- **Yes**, my duties include directly working with students with disabilities at least some of the time.
- **No**, I never work directly with this group.

For the 2018-19 school year, do you regularly work to implement, coordinate, or otherwise support the delivery of special education services, policy, or instruction in some manner (outside of direct instruction), even indirectly?

- **Yes**, this is my primary role/responsibility.
- **Yes**, my duties sometimes include work related to special education services.
- **No**.

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What grade levels do you primarily work with? (Select all that apply)

- Elementary (PK;KG-5th)
- Middle (6-8th)
- High (9-12th)
- I do not work with students or on campus.

About how many years have you:

- Worked in special education (in any capacity)?
- Worked in YCSD?

During 2018-19, special education support personnel (e.g., special education program coordinators or service providers) are available to spend enough time in general education classrooms providing support for students with disabilities and their instructors.

- Strongly disagree
- Disagree
- Agree
- Strongly agree
- Not sure/I do not know

Students in YCSD with mild disability are able to participate productively in general education learning activities.

- Strongly disagree
- Disagree
- Agree
- Strongly agree
- Not sure/I do not know

[If teaching] During the 2018-19 school year, please indicate the most prevalent form of classroom supports your students with mild to moderate disabilities received and the _approximate_ amount of time during your classes that they received these supports.

	N/A	These are never provided (0%)	Provided less than 25% of the time	Provided more than 25% and up to about half the time (50%)	Provided more than 50% of the time and up to about 75% of the time	Provided more than 75% of the time
Small group instruction	○	○	○	○	○	○
Co-teaching	○	○	○	○	○	○
One-to-one student assistance	○	○	○	○	○	○
Planning	○	○	○	○	○	○
SWD pulled out of classroom for services	○	○	○	○	○	○

To what extent do the following occur at your schools in YCSD when providing instruction (or other services) in general education classes that include students with disabilities?

	Not at all	To a minimal extent	To a moderate extent	To a great extent	Not sure/ I do not know
Teachers are able to differentiate instruction (e.g., appropriately modify content or process).	○	○	○	○	○
Teachers are able to provide appropriate accommodations outlined in IEPs (e.g., read aloud, extra time, modified questions).	○	○	○	○	○
Teachers are able to use technology and digital content that enhances learning and access for students with disabilities (e.g., screen readers, calculator).	○	○	○	○	○

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	Not at all	To a minimal extent	To a moderate extent	To a great extent	Not sure/ I do not know
Teachers provide instruction that uses the principles of Universal Design for Learning (UDL) (e.g., multiple means of engagement, representation, and expression).	○	○	○	○	○
Teachers are able to provide instructional accommodations for any student who needs them.	○	○	○	○	○
Teachers are able to track the provision of instructional accommodations for any student who needs them.	○	○	○	○	○

To the best of your knowledge, how much do you agree with the following statements?

	Strongly disagree	Disagree	Agree	Strongly agree	Not sure/ I do not know
Special education students in specialized programs (e.g., communication, behavior, multiple disabilities support programs) are included when possible in regular school activities (e.g., assemblies, extracurricular, recess).	○	○	○	○	○
Our school(s) implement a multi-tiered system of support to support the academic and behavioral challenges of students.	○	○	○	○	○
Teachers at our school(s) have the resources or supports they need in order to deliver the special education services in their classrooms.	○	○	○	○	○
The Division provides adequate resources (curriculum materials, technology, equipment, etc.) to enable teachers and support staff to meet the diverse needs of students with disabilities in the classrooms.	○	○	○	○	○
YCSD offers a continuum of services and programs that meets the needs of all students with disabilities.	○	○	○	○	○

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	Strongly disagree	Disagree	Agree	Strongly agree	Not sure/ I do not know
I understand the process for which we procure materials needed to educate students with disabilities on my campus if/when I need them	○	○	○	○	○
The RTI process at our school(s) is effective in addressing the needs of students who are experiencing difficulty in school.	○	○	○	○	○
In staff meetings, the solutions to problems of students with a disability are proposed or discussed by all teaching staff.	○	○	○	○	○
Students with disabilities at our school(s) have adequate access to appropriate instruction and learning opportunities.	○	○	○	○	○
Students with disabilities at our school(s) have adequate access to social and extra-curricular activities.	○	○	○	○	○
Students with disabilities demonstrate appropriate progress in social outcomes, compared to their nondisabled peers.	○	○	○	○	○
Students with disabilities demonstrate appropriate progress in academic outcomes compared to their nondisabled peers.	○	○	○	○	○
Teachers and other staff at our school(s) communicate effectively with families of students with disabilities.	○	○	○	○	○
Teachers at our school(s) effectively involve families in decisions about how to address individual student needs for students with disabilities.	○	○	○	○	○
Teachers and other staff at our school(s) provide educational information to families of struggling students and students with disabilities on how to support their child's learning at home.	○	○	○	○	○
Central office leadership in the Division provides the services needed to support instruction of students with disabilities.	○	○	○	○	○

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	Strongly disagree	Disagree	Agree	Strongly agree	Not sure/ I do not know
Our school(s) provide quality services to students with disabilities.	○	○	○	○	○
Students with disabilities are placed in settings with their nondisabled peers to the greatest extent possible.	○	○	○	○	○

[If teaching] How much do you agree with the following statements?

	Strongly disagree	Disagree	Agree	Strongly agree	Not sure/ I do not know
The IEPs and BIPs for the students with disabilities in my classroom are readily available to me as needed.	○	○	○	○	○
Up-to-date records for each child's progress are used in modifying current programs and future IEP planning.	○	○	○	○	○
Formal transition plans (including goals, team responsibilities, and a timeline) are incorporated into the IEP process prior to the child's entry into preschool and each level of school (ES, MS, and HS).	○	○	○	○	○
During class activities, my colleagues and I collaborate to involve students with a disability.	○	○	○	○	○
General education teachers are provided opportunities to plan lessons and instruction with special education instructors or coaches or support staff as needed.	○	○	○	○	○

[If teaching] Do you regularly work with paraprofessionals, instructional aides, or other support staff while delivering instruction or services to students with disabilities?

- Yes
- No
- Not sure/I do not know

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[If teaching] How much do you agree with the following statements regarding classroom assistance from these paraprofessionals, aides, or other support staff?

	Strongly disagree	Disagree	Agree	Strongly agree	Not sure/ I do not know
In general, I can rely on my classroom assistant(s) when I need help.	○	○	○	○	○
I am comfortable delegating tasks to my classroom assistant(s).	○	○	○	○	○
My classroom assistant(s) and I act like a team.	○	○	○	○	○
I am satisfied with the amount of support I receive from my classroom assistant(s).	○	○	○	○	○
My classroom assistant(s) has a schedule that we agreed upon that he/she follows every day.	○	○	○	○	○
My classroom assistant knows what he/she needs to do without my having to ask him/her.	○	○	○	○	○
My classroom assistant has good ideas to improve the functioning of our classroom.	○	○	○	○	○
I often feel like I am working alone in instructing my students.	○	○	○	○	○
My classroom assistant(s) and I meet regularly to discuss strategies for working with our students (e.g., what's working, what's not, etc.).	○	○	○	○	○

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For students with disabilities 14 to 21 years old, how much do you agree with the following statements?

	Strongly disagree	Disagree	Agree	Strongly agree	Not sure/ I do not know
Our staff discuss with students (and/or parents) jobs the students might do after high school.	○	○	○	○	○
Our staff discuss with students (and/or parents) opportunities for education after high school.	○	○	○	○	○
Our staff discuss with students (and/or parents) where the student will live after high school.	○	○	○	○	○
Our staff discuss with students (and/or parents) supports the student will need in the future.	○	○	○	○	○
Our staff discuss with students (and/or parents) community activities for the student.	○	○	○	○	○

[If teaching] How often, if ever, is co-teaching used in your classrooms?

- I have never used co-teaching
- It is used infrequently
- It is used often
- Co-teaching is always used in my classrooms

[If teaching] To what extent is the following true in your co-taught classes?

	Not at all	To a minimal extent	To a moderate extent	To a great extent	Not sure/ I do not know
In co-taught classes, the general education teacher is responsible for lesson planning.	○	○	○	○	○
In co-taught classes, the general education teacher is responsible for instruction.	○	○	○	○	○
In co-taught classes, the general education teacher is responsible for evaluating students.	○	○	○	○	○
In co-taught classes, the special education teacher is responsible for modification.	○	○	○	○	○

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	Not at all	To a minimal extent	To a moderate extent	To a great extent	Not sure/ I do not know
In co-taught classes, the special education teacher is responsible for monitoring student behaviors.	○	○	○	○	○
In co-taught classes, the special education teacher is responsible for monitoring student remediation.	○	○	○	○	○
The support provided to students with disabilities in a co-taught classroom is insufficient.	○	○	○	○	○
Students with disabilities learn more in a co-taught classroom than in a single-teacher general education classroom.	○	○	○	○	○
Students with disabilities in a co-taught classroom increase positive feelings about themselves as capable learners.	○	○	○	○	○
The behaviors of students with disabilities are better in a co-taught classroom.	○	○	○	○	○

How much do you agree with the following statements regarding assistive technology use at your school?

	Strongly disagree	Disagree	Agree	Strongly agree	Not sure/ I do not know
Assistive technology helps teachers tailor instruction to the specific needs of students.	○	○	○	○	○
Students with special needs function maximally in the classroom with the use of assistive technology.	○	○	○	○	○
I am convinced that assistive technology plays an indispensable role in the teaching-learning process.	○	○	○	○	○
I think a greater percentage of special education funds should be used to acquire assistive technologies.	○	○	○	○	○

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	Strongly disagree	Disagree	Agree	Strongly agree	Not sure/ I do not know
I am satisfied when I use assistive technology available to me in the classroom.	○	○	○	○	○
I feel assistive technology available to me is very complicated and difficult to use.	○	○	○	○	○

[If providing direct services to students with disabilities] How much do you agree with the following statements?

	Strongly disagree	Disagree	Agree	Strongly agree	Not sure/ I do not know
The process for making special education placement decisions is clear and communicated to teachers and school staff.	○	○	○	○	○
Special education services on our campus offer an array of options that are effective in supporting the success of students with disabilities.	○	○	○	○	○
Students with disabilities are considered full members of our student body.	○	○	○	○	○
The process for making special education placement decisions is clearly communicated to parents/guardians.	○	○	○	○	○
Placement decisions are made consistently across IEP teams and schools.	○	○	○	○	○
Staff consistently use data to make decisions about placement provision of services, and IEP goals.	○	○	○	○	○
Most of our services for students with disabilities are selected on the basis of program names and/or disabilities labels rather than individual student needs.	○	○	○	○	○
The progress of students with disabilities in achieving their IEP goals is documented and used to determine future goals.	○	○	○	○	○
I understand my role and responsibilities relative to providing services for students with disabilities.	○	○	○	○	○

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	Strongly disagree	Disagree	Agree	Strongly agree	Not sure/ I do not know
Special Education and general education staff's roles and responsibilities are clearly defined and understood relative to working with students with disabilities.	○	○	○	○	○
Teachers and other staff at my school provide educational information to families of struggling students and students with disabilities on how to support their child's learning at home.	○	○	○	○	○
PBIS schoolwide behavior supports are being implemented at our schools.	○	○	○	○	○
Students are benefiting from the implementation of PBIS at our schools.	○	○	○	○	○

In this last section, please tell us more about your work environment and job conditions (to help us understand the context of your other responses on this survey).

How much do you agree with the following statements?

	Strongly disagree	Disagree	Agree	Strongly agree	Not sure/ I do not know
YCSD staff in my department/at my school model the Divsion's behavioral expectations that are taught to students (like respect, responsibility, and readiness).	○	○	○	○	○
All in all, I am satisfied with my job.	○	○	○	○	○
I am satisfied with my performance in this school or office.	○	○	○	○	○
The stress and disappointments involved in my job aren't really worth it.	○	○	○	○	○
I am overwhelmed by my job responsibilities.	○	○	○	○	○
My job doesn't excite me anymore.	○	○	○	○	○

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	Strongly disagree	Disagree	Agree	Strongly agree	Not sure/ I do not know
I feel alienated at work.	○	○	○	○	○
I feel stressed at work.	○	○	○	○	○
The advantages of this profession clearly outweigh the disadvantages.	○	○	○	○	○
If I could decide again, I would still choose this job or position.	○	○	○	○	○
I would like to change to another school or office if that were possible.	○	○	○	○	○
I would recommend my school or office as a good place to work.	○	○	○	○	○
I'm confident I will still be working in YCSD in 2 years.	○	○	○	○	○

How much do you agree with the following statements?

	Strongly disagree	Disagree	Agree	Strongly agree	Not sure/ I do not know
I would be quite willing to spend the rest of my career with YCSD.	○	○	○	○	○
I am proud of the work that I do.	○	○	○	○	○
I am immersed in my work.	○	○	○	○	○
I worry about crime and violence at my school or department.	○	○	○	○	○
Bullying is a problem for students with disabilities at our schools.	○	○	○	○	○

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	Strongly disagree	Disagree	Agree	Strongly agree	Not sure/ I do not know
I like the way things are run in my school or department/office.	○	○	○	○	○
I have an extremely large amount of work to do at any given time.	○	○	○	○	○
I can't complete work in the required time.	○	○	○	○	○
I get along well with the people I work with.	○	○	○	○	○
There is a culture of sharing success.	○	○	○	○	○
There is mutual respect for colleagues' ideas.	○	○	○	○	○
Staff have an open discussion about difficulties.	○	○	○	○	○

Please rate the degree to which the special education services personnel at the campus or central office have been responsive **(respond in a timely manner, provide requested service/materials) to your needs/requests during 2018-19.**

- I have not interacted with these staff or services
- Not at all
- To a minimal extent
- To a moderate extent
- To a great extent
- Not sure/I do not know

Please rate the degree to which the special education services personnel at the campus or central office have been accessible **(I can reach them easily and they make themselves available to me and my team) to your needs/requests during 2018-19.**

- I have not interacted with these staff or services
- Not at all
- To a minimal extent
- To a moderate extent
- To a great extent
- Not sure/I do not know

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Please rate the degree to which the special education services personnel at the campus or central office have demonstrated <u>reliability</u> (they follow through on the services/supports they offer, services/supports are of sufficient quality) to meet your needs/requests during 2018-19.

- I have not interacted with these staff or services
- Not at all
- To a minimal extent
- To a moderate extent
- To a great extent
- Not sure/I do not know

[If providing direct services to students with disabilities] To what extent are teachers and other YCSD staff supported by leadership (supervisors, campus leaders, or central office leaders) to meet the need of students with disabilities?

	Not at all	To a minimal extent	To a moderate extent	To a great extent	Not sure/ I do not know
Staff are provided frequent feedback about performance.	○	○	○	○	○
Teachers are provided suggestions for how to improve instruction.	○	○	○	○	○
Teachers are offered constructive feedback after observing teaching.	○	○	○	○	○
Division and school leaders provide professional growth opportunities.	○	○	○	○	○
There are opportunities for school staff to learn from fellow special education teachers.	○	○	○	○	○
Staff are provided opportunities to attend workshops and conferences.	○	○	○	○	○
Staff are provided clear standards for performance.	○	○	○	○	○
Staff are provided information on up-to-date instructional and behavioral techniques.	○	○	○	○	○
Staff are given clear guidelines regarding job responsibilities.	○	○	○	○	○

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	Not at all	To a minimal extent	To a moderate extent	To a great extent	Not sure/ I do not know
Special education teachers are provided time for various non-teaching responsibilities (e.g., IEP process, meetings, communication with parents).	○	○	○	○	○
Special education teachers are provided staff development sessions that support their responsibility to educate students with disabilities.	○	○	○	○	○

[If providing direct services to students with disabilities] What type of professional opportunities are <u>most</u> effective in helping you successfully support students with disabilities?

- On-site professional development
- Virtual/online professional development
- Conferences or meetings outside the Division
- Job embedded coaching
- Peer training or coaching
- Staff and leadership meeting together
- Professional learning communities (PLCs)
- Books or materials to study
- None
- Other _____

Finally, please briefly describe the *one thing* about the current continuum of special education services in YCSD that you would prioritize changing or improving for next school year:

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Appendix F: Online Parent Survey Methodology and Instrument

Instrument Development

To assess whether parents/guardians are satisfied with the special education programs offered by the York County School Division (YCSD), the review team developed a survey instrument that focused on four key areas: 1) Satisfaction with instructional services and IEP development; 2) Satisfaction with school environment and family communication; 3) Parent involvement; and 4) Transportation services. Relying on existing survey items from best practices research in special education, the review team drafted a survey instrument accounting for YCSD needs and concerns. Survey items largely came from the National Center for Special Education Accountability Monitoring (NCSEAM), a federal technical assistance center that worked with key special education stakeholders in six states to develop a bank of survey items for measuring parent satisfaction with their child's special education services. The review team also adapted existing survey items on individualized education program (IEP) development (Fish 2008), transportation for individuals with disabilities (Samuel, et al. 2013), and parent involvement in their child's education (Badri 2014).

In addition to substantive feedback about division services and environment, the survey asked parents to self-report demographic information for their family along with demographic information for their oldest child receiving special education services. These questions included student grade and primary disability along with family military ties and parent's educational attainment.

Description of the Sampling Frame and Survey Administration Process

Student, and thereby parent, eligibility for inclusion in the survey sampling frame was determined by whether a student had an IEP and was receiving special education services through YCSD on March 15, 2019. Thus, only parents whose students received special education services during the 2018-19 school year and who provided an email address or an SMS-capable phone number to the Division were included in the survey sample. The review team emailed the online survey link to parents/guardians using contact information provided by YCSD.[1] A small number of parents did not provide the Division with an email address, but did have an SMS-capable phone number on file. These parents received an open link to complete the survey via text message.

An email or text invitation with a unique link was sent to each parent contact. If parents had multiple children receiving special education services, they received a single link to complete the survey about their experiences with YCSD. For those with multiple children within the sampling frame, parents were asked to consider their experiences for their oldest child receiving special education services. This means that

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[1] The survey was hosted on the Qualtrics platform.

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parent responses are not duplicated in any way, even if they had multiple children receiving special education services.

The data file YCSD provided to the review team contained 2,148 unique students who were receiving special education services on the eligibility determination date. The file contained parent contact information, including name, mailing address, email address, and phone number. Not all students had at least one parent with a valid email address in the contact list, though nearly 95 percent (2,030) did. A small number of students (3%) had no parent contact information, including phone number, listed in the parent contact file. Additionally, a small number of students had a parent with an SMS-capable phone number on file with YCSD. After creating a unique parent contact file, linked with all of their students receiving special education services, the review team sent 1,561 unique parent invitations via text and email, representing 2,040 unique students.

In addition to emailing surveys, the review team followed up email invitations with a text message reminding parents to complete the survey for those who had a valid cell phone number on file with YCSD. The text message reminders included an anonymous link for parents to complete the survey, which did not allow the research team to link responses back to administrative data. Roughly 13 percent of the completed surveys were accessed through the anonymous link made available through follow-up text messages.

The survey window opened on April 29, 2019 and closed on May 24, 2019. During this time, Gibson monitored response rates and sent reminder emails to those who had not completed a survey. Ultimately, Gibson extended the deadline to allow for more responses and officially closed and downloaded the responses on June 22, 2019.

Survey Response Rates and Respondent Characteristics

Parents submitted a total of 319 surveys of the 1,561 surveys sent, yielding just over a 20 percent overall response rate. These responses represent parents from approximately 23 percent of students receiving special education services with email addresses on file with the school division. Parents sometimes skipped survey items, and several items in particular were only relevant for parents who noted that their child relied on school transportation to get to and/or from school. As such, the number of responses to each survey item varied between 151 and 319, but was greater than 300 for most items.

Using self-reported demographic data from the parent survey, the review team compared the demographic characteristics of the students of responding parents to the full population of students who receive special education services in YCSD, regardless of whether they had a survey returned on their behalf. Table F1 illustrates that the children of parents who responded to the survey were somewhat more likely to be in high school when compared with the population of students receiving special education services. Parents of high school students comprised roughly 44 percent of the survey sample, compared with about 27 percent of the population of students receiving special education services, a difference of 17 percentage points. While the survey sample may include more parents of high school

students than the population, this may be, in part, a result of the fact that parents were asked to provide demographic information for their oldest child receiving special education services.

In terms of the reported primary disability, a larger proportion of responding parents had a child with autism when compared with the population of students receiving special education services (about 16% in the population compared with 21% of the survey sample). A smaller proportion of parents reported that their child had an other health impairment (25% in the population compared with 18% of the survey sample) or a specific learning disability (25% in the population compared with 19% in the survey sample). In all other primary disabilities, differences between the respondent group and all YCSD students who received special education services were fewer than five percentage points.

Finally, in looking at military connectedness, students connected with military families were slightly under-represented in the survey. Parents of students connected to the military make up roughly one-third of YCSD's population of students receiving special education services compared with 27 percent of responding parents who reported their child had a parent in the military.

Table F.1. Representativeness of Survey Respondents to the Population of Students who Received Special Education Services in YCSD

Group	Division Population	Survey Sample	Percentage Point Difference
School Level			
Elementary school	50.4%	32.4%	-18.0
Middle school	23.1%	24.1%	+1.0
High School	26.7%	43.5%	+16.8
Primary Disability			
Autism	15.9%	21.3%	+5.4
Deaf-Blindness	0.0%	0.3%	+0.3
Developmental Delay	7.6%	9.7%	+2.1
Emotional Disturbance	4.4%	--	-4.4
Hearing Impairments	0.9%	1.9%	+1.0
Intellectual Disabilities	3.7%	6.0%	+2.3
Multiple Disabilities	1.8%	4.4%	+2.6
Orthopedic Impairments	0.2%	1.6%	+1.4
Other Health Impairments	25.3%	17.6%	-7.7
Specific Learning Disabilities	24.7%	18.8%	-5.9
Speech or Language Impairments	15.1%	14.7%	-0.4
Traumatic Brain Injured	0.2%	0.3%	+0.1
Visual Impairments	0.3%	1.6%	+1.3
Other	--	1.8%	+1.8
Military Connected Students			
Military connected (active duty/reserve)	32.3%	26.6%	-5.7

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Group	Division Population	Survey Sample	Percentage Point Difference
No military connected	67.7%	73.4%	+5.7

Parent Survey Instrument

First, please tell us a bit about yourself and your child(ren) that receive special education services from York County schools.

How many children that currently live in your home or residence?

	None or N/A	One	Two	Three	Four	Five or more
Attend a YCSD school?	○	○	○	○	○	○
Have an IEP?	○	○	○	○	○	○
Receive any special education services or instruction?	○	○	○	○	○	○
Have a 504?	○	○	○	○	○	○

Which of the following best describes your race?

- White
- Black or African American
- American Indian or Alaska Native
- Asian
- Native Hawaiian or Pacific Islander
- Other

Are you Hispanic or Latino?

- No
- Yes
- Not Sure

Which of the following best describes your current level of education?

- Less than high school
- High school graduate
- Some college
- 2 year degree

- 4 year degree
- Professional degree
- Doctorate

Which of the following best describes your family's overall annual level of income?

- $0 to $19,999
- $20,000 to $39,000
- $40,000 to $59,999
- $60,000 to $99,999
- $100,000 or greater

What grade does your <u>oldest</u> student currently attend?

- Pre-K
- Kindergarten
- Grade 1
- Grade 2
- Grade 3
- Grade 4
- Grade 5
- Grade 6
- Grade 7
- Grade 8
- Grade 9
- Grade 10
- Grade 11
- Grade 12
- Post-grade 12/other

Which of the following best describes the primary disability or exceptionality for your oldest student?

- Autism
- Orthopedic impairment
- Visual impairment
- Hearing impairment/deafness
- Specific learning disability
- Speech or language impairment
- Other health impairment
- Deaf-blindness
- Traumatic brain injury
- Developmental delay
- Intellectual disability
- Multiple disabilities

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- None of the above/Other

Does any parent or guardian for your oldest student currently serve in the military or armed services?

- Not sure
- Yes
- No

If you have more than one child that receives special education services in YCSD, please answer the questions below thinking of your oldest child.

Some of the questions in this survey might not be applicable to you or your student(s). If so, please skip the question. If you do not know the information, please mark "Not Sure".

Please indicate the extent to which you agree or disagree with the following statements.

	Strongly Disagree	Disagree	Agree	Strongly Agree	Not Sure or N/A
General education teachers implement accommodations and modifications as indicated on my child's IEP (or 504 education plan).	○	○	○	○	○
The school provides my child with all the services documented on my child's IEP (or 504 education plan)	○	○	○	○	○
All of my concerns and recommendations were documented on the IEP (or 504 education plan).	○	○	○	○	○
At the IEP (or 504) meeting, we discussed how my child would participate in statewide assessments.	○	○	○	○	○
My child's IEP (or 504 education plan) covers all appropriate aspects of my child's development.	○	○	○	○	○
The school provides quality transition planning for life after high school, including services to help my child reach his/her postsecondary goals.	○	○	○	○	○

Please indicate the extent to which you agree or disagree with the following statements.

	Strongly Disagree	Disagree	Agree	Strongly Agree	Not Sure or N/A
The transition outcomes developed for my child are appropriate to his/her needs.	○	○	○	○	○
My child is taught in regular classes, with supports, to the maximum extent appropriate.	○	○	○	○	○
Services are provided to help students become self-sufficient after high school.	○	○	○	○	○
The school ensures that after-school and extracurricular activities are accessible to students with disabilities.	○	○	○	○	○
I am satisfied with the quality of special education services that my child receives.	○	○	○	○	○
Teachers and administrators at my child's school effectively manage incidents of teasing or bullying.	○	○	○	○	○
At IEP (or 504) meetings, the team selects accommodations that my child needs.	○	○	○	○	○
My child spends an appropriate amount of time, given his/her learning needs, in general education settings with classmates who do not have disabilities.	○	○	○	○	○
School personnel conveyed sufficient knowledge of the IEP process.	○	○	○	○	○

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To what extent do you do the following activities?

	Never	To a minimal extent	To a moderate extent	To a great extent	Not Sure or N/A
I participate in school-sponsored activities with my child.	○	○	○	○	○
I engage in learning activities with my child at home.	○	○	○	○	○
I ask my child to talk about what he/she is learning in school.	○	○	○	○	○
I ask my child about his/her homework assignments.	○	○	○	○	○
I help my child with his/her homework assignments.	○	○	○	○	○

Please indicate the extent to which you agree or disagree with the following statements.

	Strongly Disagree	Disagree	Agree	Strongly Agree	Not Sure or N/A
Written information I receive is written in an understandable way.	○	○	○	○	○
The process for having my child referred and evaluated for testing was clear and easy.	○	○	○	○	○
At IEP (or 504) meetings, the team selects modifications that my child needs (for example, my child gets different reading materials than his/her classmates)	○	○	○	○	○
The school provides my child with all services written on his/her IEP plan.	○	○	○	○	○
Placement decisions for my child are made using data and input from all IEP team members including my input.	○	○	○	○	○
Overall, I have had positive experiences at IEP (or 504) meetings.	○	○	○	○	○

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	Strongly Disagree	Disagree	Agree	Strongly Agree	Not Sure or N/A
We had thorough discussions of goals and objectives during IEP (or 504) meetings.	○	○	○	○	○
Bullying is a problem at my child's school.	○	○	○	○	○
I worry about crime and violence at my child's school.	○	○	○	○	○

Please indicate the extent to which you agree or disagree with the following statements.

My child's school:

	Strongly Disagree	Disagree	Agree	Strongly Agree	Not Sure or N/A
Connects families to other families that can provide information and mutual support.	○	○	○	○	○
Offers parents training if they need help understanding the curriculum being taught to their child.	○	○	○	○	○
Connects parents to organizations that serve parents of children with disabilities.	○	○	○	○	○
Gives parents the help they may need to play an active role in their child's education.	○	○	○	○	○
Communicates regularly with me regarding my child's progress on IEP (or 504 education plan) goals.	○	○	○	○	○

Please indicate the extent to which you agree or disagree with the following statements.

Teachers and staff at my child's school:

	Strongly Disagree	Disagree	Agree	Strongly Agree	Not Sure or N/A
Show sensitivity to the needs of students with disabilities and their families.	○	○	○	○	○
Encourage me to participate in the decision-making process.	○	○	○	○	○
Respect my cultural heritage.	○	○	○	○	○
Regularly share data with me about how my child is doing in school.	○	○	○	○	○
Treat me as a team member.	○	○	○	○	○

What type of transportation does your child rely on to get to school? (Select all that apply.)

- Personal car/vehicle
- Bike
- Walking
- Rides with friends or family
- Public transportation
- School bus, van, or other vehicle (provided by the school division)
- Car pooling with other families
- Taxicab or car ride sharing (e.g., Uber or Lyft)
- Other _____

How satisfied are you with your child's transportation options and experiences? (skip or answer "N/A" if the question does not pertain to you)

	Extremely dissatisfied	Dissatisfied	Satisfied	Extremely satisfied	Not Sure or N/A
Your child's access to transportation options where you live.	○	○	○	○	○
The process of applying for transportation for your child from the school or YCSD.	○	○	○	○	○

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	Extremely dissatisfied	Dissatisfied	Satisfied	Extremely satisfied	Not Sure or N/A
On-time pick-ups and arrivals for the bus or transport.	○	○	○	○	○
Ease of getting on/off the bus or transport.	○	○	○	○	○
How safe and secure you or your child feels during transport to school.	○	○	○	○	○
The courtesy of the drivers and staff transporting your child to school.	○	○	○	○	○
The safe driving habits of the drivers and staff transporting your child to school.	○	○	○	○	○
The sensitivity to the needs of your child during transportation.	○	○	○	○	○
How drivers and staff handle emergencies.	○	○	○	○	○
The space and comfort of the transportation provided.	○	○	○	○	○
The reliability or quality of equipment on the transport (e.g., ramps, handrails, tie downs, seats).	○	○	○	○	○
Overall rating for your child's school transportation experience.	○	○	○	○	○

In order to help improve special education services in York County Schools, we would like the opportunity to have a brief (about 10 minute) phone interview with a select group of parents.

If you would like us to include you in this group of selected participants, please provide a phone number where we can reach you below. Thank you for your time and valuable feedback!

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Appendix G: Parent Telephone Interview Methodology and Protocol

Methodology

To ensure that a more representative group of parent voices were considered, the review team conducted phone interviews with a random sample of hard-to-reach parents of students that receive special education services in the York County School Division (YCSD). Parents were considered hard to reach if they did not participate in the broader parent survey, they did not have a valid email address or SMS-capable cell phone on file with the Division, and if their student was designated as eligible for Free or Reduced Price Lunch. Ultimately, a sample of 97 parents were contacted to participate in a phone interview.

As part of the outreach to hard-to-reach parents, the research team contacted 34 parents between May 20, 2019 and May 31, 2019, for a response rate of 35 percent.[1] After indicating the grade(s) of their student (Table G.1), the review team asked parents about the services their student received, the quality of communication and information received from YCSD, perceived progress toward Individualized Education Program (IEP) goals, and overall satisfaction with the Division's ability to meet their student's needs.

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[1] 33 of the 34 responding parents indicated their student currently received special education services. One responding parent indicated that their student received 504 services only.

Table G.1. Student Grade Level of Interviewed Parents' Students

Student Grade Level	# of Students
Pre K	2
Kindergarten	2
Grade 1	4
Grade 2	4
Grade 3	2
Grade 4	2
Grade 5	6
Grade 6	-
Grade 7	4
Grade 8	5
Grade 9	4
Grade 10	3
Grade 11	2
Grade 12	-
Post-Grade 12/Adult transition services	-

Source. Telephone Interview Data, 2019.

The interview opened with questions about the background information about the parent's child who received special education services. Next, interviewers asked responding parents a mix of open-ended and closed-ended questions. Once all interview data were collected, open-ended responses related to the frequency and setting of the special education services students receive, the quality of communication and information parents receive about special education services, and the types of special education services students are missing (or do not receive enough of) were broadly categorized into Positive, Negative, or Mixed responses. As parents might speak to more than one service or more than one student receiving SPED services, parent responses may be placed into more than one category. Responses within each category (Positive, Negative, or Mixed) were then reviewed and synthesized.

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Parent Interview Protocol

Hello. My name is [NAME] and we are conducting the special education review for York County Public Schools - **do you have a few minutes to give your feedback about the special education services and instruction your child is receiving?**

- Child is not enrolled in York County schools
- Child does not receive special education services

Before proceeding I want to mention that we won't identify you or your child in any reporting, we will keep your identity confidential. Our goal is to learn what parents like you are saying about their experiences and provide that input to York County Schools to help inform changes and improvements. If any of my questions don't apply to you or you don't wish to answer them, just let me know.

To get started, can you tell me what grade your child or children who receive special education services is currently in? (check multiple if they have more than one child in SPED services in YCSD)

- PreK
- Kindergarten
- Grade 1
- Grade 2
- Grade 3
- Grade 4
- Grade 5
- Grade 6
- Grade 7
- Grade 8
- Grade 9
- Grade 10
- Grade 11
- Grade 12
- Post-Grade 12 / Adult transition services

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To start, I'd like to understand the types of special education services and instruction your child(ren) is currently receiving in York County Schools. **What is the primary setting or ways in which your child receives special education services or instruction: (e.g., general classroom versus other setting, general education teachers versus other special ed staff, typical services received)?**

	Frequency			Satisfaction			
	Never	Sometimes	Often	Dissatisfied	Satisfied	Mixed/ Neutral	Not Sure/NA
Mostly in general education classroom setting (inclusion)	○	○	○	○	○	○	○
Mostly in special education specific classrooms	○	○	○	○	○	○	○
In self-contained or resource rooms at the school campus	○	○	○	○	○	○	○
From paraprofessionals, special education aides, or specialists (like therapists, OTs, PTs, social workers)	○	○	○	○	○	○	○
In an out of division placement, not at a York County school/facility	○	○	○	○	○	○	○
At a private facility or home	○	○	○	○	○	○	○
Other	○	○	○	○	○	○	○

Next, can you tell me about the quality of communication and information you receive from York Co about special education services and instruction?

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Who do you usually communicate with?

	Frequency			Satisfaction			
	Never	Sometimes	Often	Dissatisfied	Satisfied	Mixed/ Neutral	Not Sure/NA
General education teachers	○	○	○	○	○	○	○
Special education teachers	○	○	○	○	○	○	○
Special education specialists , aides, paraprofessionals, or support staff	○	○	○	○	○	○	○
Campus leaders (principals, counselor, representative)	○	○	○	○	○	○	○

How frequently do you do each of the following?

	Frequency			Satisfaction			
	Never	Sometimes	Often	Dissatisfied	Satisfied	Mixed/ Neutral	Not Sure/NA
Email or phone updates about student progress	○	○	○	○	○	○	○
In person meetings with staff about student progress	○	○	○	○	○	○	○
Communicate about IEP process or progress toward IEP goals	○	○	○	○	○	○	○
Other	○	○	○	○	○	○	○

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Resources: Do you think there is anything missing from your child's educational team? (the staff that help educate your child) (Specific probes: any types of personnel the child does not interact with but need to? and skill sets or training staff do not have? any availability staff do not have or support they do not provide?)

What types of special education services would you like to see your child receive that they are currently not receiving? (or are not receiving enough of)?

- 1 on 1 support from aides/paraprofessionals
- Inclusion opportunities
- Tutorial instruction
- Specialized instruction
- Assistive technology (e.g., screen readers, software specialized for your child's disability)
- Reading support
- Any social/emotional supports
- Transportation to school
- Movement/transportation/logistics help while at school
- Therapy services (physical, emotional, mental)
- Other

Do you feel that the services your child is receiving are helping them make progress toward their IEP learning goals?

Do you feel that the services your child is receiving are helping them make progress toward their IEP learning goals?

- Agree
- Neither agree nor disagree
- Disagree
- NA/not sure

What is your overall level of satisfaction with the school's ability to address your child's needs?

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What is your overall level of satisfaction with the school's ability to address your child's needs?

- Extremely satisfied
- Somewhat satisfied
- Neither satisfied nor dissatisfied
- Somewhat dissatisfied
- Extremely dissatisfied
- NA/not sure

Those are all of our questions. **Are there any other things we haven't yet discussed that you think are important for us to consider as we work to help improve special education services in York County?**