

**BUILDING A UNIFIED SYSTEM OF
SERVICE DELIVERY: INCLUSIVE
EDUCATION THAT IMPROVES
OUTCOMES FOR STUDENTS WITH
AND WITHOUT DISABILITIES**

by the Council of the Great City Schools

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ACKNOWLEDGEMENTS

The Council of the Great City Schools (Council) thanks the many individuals who contributed to our task of gathering and reviewing quantitative and qualitative information designed to inform our recommendations for improving the Boston Public Schools (BPS) provision of special education. Their contributions were critical to our mission. This work stemmed from the April 2022 report issued by the Massachusetts Department of Elementary and Secondary Education (DESE) and associated Systemic Improvement Plan (SIP). It also builds upon the BPS/Boston Teachers Union Memorandum of Understanding (MOU) for improved inclusive education for the school systems students.

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

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

Third, we thank district staff members who contributed to this effort, particularly Dr. Drew Echelson, Chief of Schools (previously Acting Superintendent), Dr. Linda Chen Senior Deputy Superintendent, and Dr. Lauren Viviani, interim Assistant Superintendent of Special Education, and Monica Hogan, Assistant Superintendent of Data Strategy and Implementation. They arranged the interviews and provided the detailed data and documents requested by the team. The time and effort required to organize a review such as this are extraordinary, and their work and support of all the staff was much appreciated.

Fourth, the Council thanks the many individuals who met with us, including central office administrators and personnel, principals, general and special educators, paraeducators, related-services personnel, parents/families, and representatives from the Boston Teachers Union and Boston Public Schools' Special Education Parent Advisory Council. They work passionately to support children with disabilities and ensure the school district serves these students in the best possible manner.

Fifth, the Council thanks Dr. Rocky Torres, Assistant Superintendent of Student Support Services for Seattle Public Schools and Jessica Baldwin, Interim Deputy Chief of Student Services for Cleveland Metropolitan School District. Their contributions to this review were enormous. The enthusiasm and generosity of these individuals and districts that have supported this review serve as further examples of how the nation's urban public-school systems are banding together to help each other improve performance for all students.

Finally, I thank Dr. Karla Estrada, who facilitated the work of the team prior to and during the team's site visit, and Sue Gamm, a nationally recognized expert in special education and a long-time consultant to the Council, who worked diligently to prepare the final report. Their work was outstanding, as always, and critical to the success of this effort.

Thank you

Dr. Ray Hart
Executive Director
Council of the Great City Schools

CHAPTER 1. PURPOSE AND ORIGIN OF THE PROJECT

Previous Boston Public Schools Acting Superintendent, Dr. Drew Echelson, asked the Council of the Great City Schools to review the district’s instruction, services, and support for students with disabilities and interview stakeholders to ultimately provide a set of recommendations for improving special education to Superintendent Mary Skipper. Since the initiation of the Council’s review, BPS’s leadership has shared their strong desire to improve student outcomes for students with disabilities and all students generally. This report was written, and recommendations are provided, to achieve this goal and maximize the district’s capacity to educate all students effectively.

Work of the Strategic Support Team

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

The Council’s Strategic Support Team (Council SST) visited the district August 23 – August 26, 2022. Additional interviews were scheduled virtually between September 28-30, 2022 and October 2022. During this period, the Council team conducted interviews and focus groups with district staff members, representatives from the Boston Public Schools Special Education Parent Advisory Committee (SpEDPAC), Boston School Committee, Boston Teachers Union, Massachusetts Department of Elementary and Secondary Education, and many others. (A list of those interviewed is presented in the appendices of this report.) In addition, the team reviewed numerous documents and reports, analyzed data, and developed initial recommendations and proposals before finalizing this report. (See the appendices for a list of documents reviewed.)

On the final afternoon of its site visit, the team briefed the superintendent and district leadership on the team’s observations and preliminary recommendations. This approach of providing technical assistance to urban school districts by using senior managers from other urban school systems is unique to the Council and its members. The organization finds it to be an effective approach for several reasons.

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

Second, the recommendations from urban school peers have power because the individuals who develop them have faced many of the same challenges encountered by the district

requesting the review. No one can say that these individuals do not know what working in an urban school system is like or that their proposals have not been tested under the most rigorous conditions.

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

Members of the Strategic Support Team for this project included those named below.

Dr. Ray Hart Executive Director Council of the Great City Schools	Sue Gamm, Esq. Former Chief Specialized Services Officer Chicago Public Schools
Dr. Karla Estrada Chief Academic Officer Council of Great City Schools	Dr. Rocky Torres Assistant Superintendent Student Support Services Seattle Public Schools
Jessica Baldwin Interim Deputy Chief of Student Services Cleveland Metropolitan School District	

CHAPTER 2. BOSTON PUBLIC SCHOOLS BACKGROUND AND REPORT OVERVIEW

Founded in 1657, the Boston Public Schools is the oldest public school system in America and the largest school system in Massachusetts. BPS educates some 46,525 in 118 schools, including three attended solely by students with disabilities.¹ Overall, 43 percent of the district’s students are Latinx, 29 percent are black, 15 percent are white, 9 percent are Asian, and 4 percent are multiracial (not Latinx). English learners account for 30 percent of BPS’s total enrollment. Furthermore, 69 percent of district students have a status of economic disadvantage.

Of all district students, 21.9 percent receive special education. Some 24 percent of all students have an IEP and of all students with IEPs, 33.6 percent are English language learners. Of all students with IEPs, 83 percent have a status of economic disadvantage.

Recently hired by the School Committee, Superintendent Mary Skipper assumed her leadership role on September 26, 2002. The superintendent has inherited a district with a decreasing student enrollment, having 8,000 fewer students between 2010 and 2020, and another 10,000 students fewer in the 2022-23 school year. BPS’s current 46,525 enrollment is below the 50,000 student mark for the first time in decades.² Since 2020, four BPS schools have closed.

In addition to declining enrollment, the Superintendent is responding to an May 2022 report issued by the MA Department of Elementary and Secondary Education (DESE). One critical area of action relates to overdue matters involving “a lack of inclusive opportunities for students within the special education continuum of alternative services and placements.” This report focuses on contributing structural factors to these circumstances with associated recommendations for action.

Methodology and Organization of Findings

The project scope was guided by the Systemic Improvement Plan between BPS and DESE, which articulated that interviews with key stakeholders be conducted to identify recommendations for improving special education services. In addition, the SST triangulated the information provided to further inform and refine the recommendations. The recommendations in this report are based on information from multiple sources, including documents provided by BPS and other organizations; electronic student data provided by BPS; group and individual interviews; documents; and legal sources, including federal and state requirements and guidance

¹ Students with disabilities who have individualized education programs (IEPs) and receive special education services are also referred to as students with IEPs. For this report, students with disabilities exclude those who are eligible for services under Section 504 of the Rehabilitation Act (Section 504), unless otherwise stated.

² Vaznis, James (November 18, 2021). “Boston Public Schools’ enrollment drops below 50,000 students for the first time in decades.” The Boston Globe. Retrieved from <https://www.bostonglobe.com/2021/11/18/metro/boston-public-schools-enrollment-drops-below-50000-students-first-time/>.

documents. No one is personally referred to or quoted in the report, although school district position titles are referenced when necessary for contextual purposes.

- Chapter 2 of this report provides background information on the district.
- Chapter 3 presents an executive summary of the report.
- Chapter 4 are the Council team's recommendations and the contextual understandings that inform these recommendations.

These recommendations focus specifically on the key areas that surfaced from the interviews, the data analyzed, and the documents reviewed.

CHAPTER 3. EXECUTIVE SUMMARY

Boston Public Schools asked the Council of the Great City Schools to review the district’s special education programs and to make recommendations for improving education for students with disabilities. To conduct its work, the Council assembled a team of special education experts with strong reputations for this area of work in their own districts. The Council team visited Boston in August, conducted numerous interviews, reviewed documents, and analyzed data. This includes the DESE report from March 2020, follow up May 2022 report, and Systemic Improvement Plan. At the end of the visit, the team formulated and presented preliminary observations and recommendations. Additional interviews with stakeholders and BPS staff were conducted virtually in September and October.

Based on the interviews and review of data and documents, key themes surfaced with many requiring urgent actions for BPS to take. The themes that surfaced and are addressed in this report include:

- BPS’s configuration of special education programs and services, including policy and procedures that contribute to the placement of students with disabilities (SwD) in restrictive settings.
- High proportion of SwDs in a small number of schools.
- Long standing premises/biases triggering disproportionately high special education eligibility rates, especially for male students of color and English learners (ELs).
- The impact of autonomy and limited monitoring activities on the achievement outcomes for SwDs.
- English learners with disabilities (ELSwD) have achievement rates lagging behind all other groups and their appears to be a lack of coordinated accountability and services for ELs with disabilities.
- Inclusion models that require SwDs to be placed in a few schools and based on “seat” availability.
- Inconsistent leadership in BPS and across departments, which has contributed to ineffective development/implementation of policies, procedures, and practices that impact SwDs, including within the Office of Special Education (OSE).
- Need for consistent MTSS implementation at the school and district level with clear student progress monitoring and tiered interventions.

However, BPS has several things in place that will support the action steps needed to address the recommendations the Council has provided to build a more effective unified system of service delivery for students with/without disabilities. BPS’s School Committee and

Superintendent Skipper are determined to improve the school system for all students with a particular laser focus on SwDs. In addition, in an August 2022 Memorandum of Understanding (MOU) between the School Committee of the City of Boston and the Boston Teachers Union (BTU), the parties set forth an inclusive lens for viewing the education of students with/without disabilities, and in a manner that improves academic/social-emotional outcomes for all students. The Council's Strategic Support Team (SST) supports this stated vision and acknowledges how it is setting a new path forward in BPS:

Inclusion is fully delivered when all students are educated in the LRE and are provided access to a full continuum of services that meet their individualized and special needs. Inclusion is not a place or a program. All classrooms in the Boston Public Schools must be inclusive.

There is also city and community commitment to supporting BPS in attaining its educational outcomes for SwDs. These assets are essential for the district to in tackle long time practices and procedures that were intended to meet SwD needs, yet overtime have contributed to inequities and lack of improved outcomes.

For example, as referenced in the MAC Report, various elements of the 2013 Inclusion Plan have themes that continue today: too many referrals for special education and for designated classroom instruction because of literacy and behavior concerns; instruction not based on core curriculum with supplemental specially designed instruction (SDI) and related services (RS), lack of extensive professional development for both special/general educators, etc. The 2013 report referred to the 47 percent of BPS students educated in separate settings, which was then twice the national average. Currently, 58 percent of students are educated in a specialized classroom for either full inclusion or substantially separate.

As DESE wrote in its 2022 report, "Without immediate steps to develop an agreed-upon plan for prioritizing and remedying these challenges, for stable and effective departmental leadership, and for effective implementation of improved policies and services, frustration and mistrust among families and other key stakeholders will continue to increase, and students will miss out on critical opportunities to learn, develop, and thrive." DESE's report described in great detail BPS's longstanding, disproportionately high, restrictive education of BPS's SwDs, particularly involving males of color and English learners, and relatively few number of schools charged with educating a large proportion of these students. The state agency first highlighted this issue in its 2020 report and found two years later that BPS has shown a "lack of urgency" in addressing this issue and improving special education services.

The Council's report provides information gathered from interviews, data analysis, and document review to contextualize associated recommendations to address the issues BPS faces to improve its identification and education of SwDs. These recommendations and associated actions are intended to reinforce the expressed commitments by the School Committee, BPS-BTU MOU, and district leadership to take seriously the challenges experienced by SwD and

their families, and DESE's charge. The recommendations begin with overall components to be addressed that impact inclusive instruction, which are followed by phased-in implementation of changes in the way special education is configured, students are placed, and instruction is provided to students. This does not simply mean moving students from more to less restrictive settings through the IEP process, and other factors involved. Rather, it must address root causes contributing to long standing barriers in policies, practices, and procedures.

Due to the urgency and complexity of certain action steps, timelines have been included. For example, a phased timeline is recommended for planning/implementing the reconfiguration of special education through a unified system of service delivery for inclusive practices. BPS may choose to adapt various recommendations and action steps stated in this report, as appropriate.

The contextual themes and recommendations presented in this report are –

1. Addressing BPS's High Proportion of Students with Disabilities (Recommendation 1. Special Education Referrals, Assessments, and Eligibility)
2. Ensuring an Effective Multi-Tiered System of Supports is in Place (Recommendation 2. Comprehensive MTSS Framework)
3. Students with Disabilities, Including English Learners, Achievement Outcomes (Recommendation 3. Focused Conversations on SwD/ELSwD Achievement and KPIs)
4. Disability Educational Environment Demographics (Recommendation 4. BPS Educational Settings Using Federal Reporting Categories)
5. English Learners Eligible for Special Education and Instruction (Recommendation 5. English Learners Eligible for Special Education and Instruction)
6. BPS's Configuration of and Support for Special Education (Recommendation 6.1. Revisioning and Instituting Inclusive Instruction Practices, Recommendation 6.2. Phased-in Inclusion Planning and Implementation, and Recommendation 6.3. McKinley Schools and ODU School Attention)
7. High Proportion of Students with Disabilities in a Small Number of Schools (Recommendation 7. Reduce High Proportion of SwD in Small Number of Schools)
8. Interdepartmental Collaboration and OSE Organization (Recommendation 8. BPS Collaboration, OSE Structure, and School-based Support)
9. Monitoring, Earned Autonomy, and Accountability (Recommendation 9. Monitoring, Earned Autonomy, and Accountability)
10. Recommendation 10. Hire Expert Partners

The Council knows that the area of special education is only one of several challenges that the school district is facing. The public should know that it is going to take the district's leadership some time to address these challenges, but BPS will need to share with the public its plan for

implementing the recommendations suggested. The Council of the Great City Schools stands ready to help the district and its leadership in any way that is deemed beneficial and constructive.

CHAPTER 4. CONTEXTUAL INFORMATION AND RECOMMENDATIONS

In the August 2022 Memorandum of Understanding (MOU) between the School Committee of the City of Boston and the Boston Teachers Union (BTU), the parties set forth an inclusive lens for viewing the education of students with and without disabilities, and in a manner that improves academic and social-emotional outcomes for all students.

Inclusion is fully delivered when all students are educated in the LRE and are provided access to a full continuum of services that meet their individualized and special needs. Inclusion is not a place or a program. All classrooms in the Boston Public Schools must be inclusive.

Inclusive practice refers to instructional/behavioral strategies that improve academic and social-emotional outcomes for all students, with and without disabilities, in general education settings. The parties are committed to increasing inclusive practices/opportunities for all students regardless of their level of need.

The Individuals with Disabilities Education Act (IDEA) requires that students with disabilities are educated in the least restrictive environment with specially designed instruction, given supports necessary to implement their IEP and make effective progress on their IEP goals, in light of their circumstances. It is our belief that all students should be full and accepted members of the school community and students with disabilities placement should first consider the right to be educated in the general education setting alongside their typically developing peers. Effective inclusive education requires a high level of collaboration among general education, special education, related service providers, and support staff to implement and model an inclusive community.

Every student in BPS is a general education student first. We also share a common belief that the achievement and opportunities of our students is our collective responsibility. ...

The Council's Strategic Support Team (SST) supports and has used the above exemplary stated vision to guide the recommendations set forth within this report. Through its review, the SST received and reviewed a voluminous amount of quantitative and qualitative information that provided a valuable context for formulating the SST's recommendations. The SST embedded relevant DESE specified requirements/recommendations from its May 2022 report and corrective action plan (CAP), and MOU expectations, along with recommendations shared by the many stakeholders with whom the SST met.

1. Addressing BPS’s High Proportion of Students with Disabilities

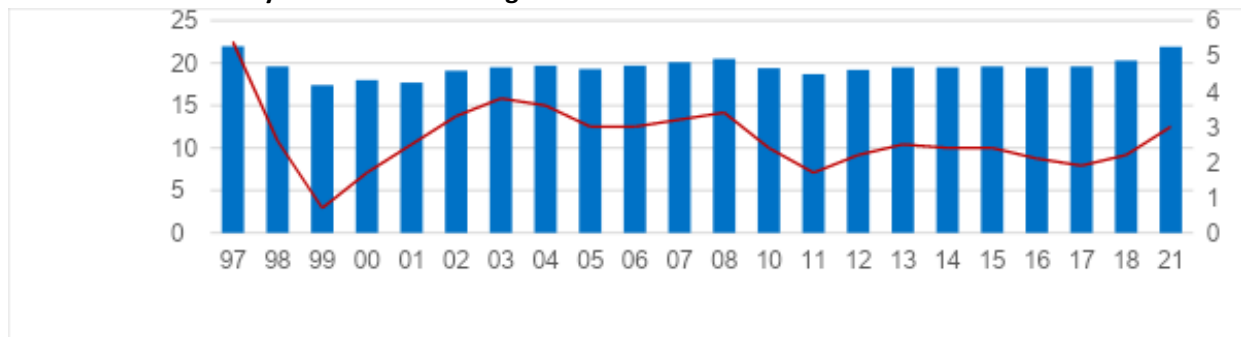
In 2020-21, compared to the national rate of 14.5 percent, some 19 percent of all MA students had a disability; only Maine (20 percent) and New York (20.5 percent) posting higher rates.³ By comparison, 21.9 percent of BPS students had a disability in 2021-22; only 19% of MA school districts had a higher rate.⁴ Complicating this issue for Boston, its public schools do not each have a natural proportion of students with IEPs,⁵ i.e., each having a rate approximating 22 percent. This additional challenge is a product of BPS’s historical categorical placement system and zone school enrollment structure that produces a small number of schools enrolling disproportionately high rates of students with IEPs. This challenge is addressed further in Section 6 below.

This section presents data showing the characteristics of BPS’s students with disabilities and their educational outcomes.

Disability Rates for BPS and MA (1997 – 2021)

Only in 1997 did BPS’s disability rate match its 2021-22 rate of 21.9 percent (or 22 percent rounded). During the intervening two decades, the lowest rates of 17.4 percent, 18 percent, and 17.7 percent were posted between 1999 and 2001. Although BPS’s rate was 5.4 percentage points above the state’s rate in 1997, the gap was smaller subsequently and has ranged from a low of 1.7 percentage points (2000) to 3.8 points (2003). In 2021-22, BPS’s rate was 3.0 points above the state rate. (See Exhibit 1a.)

Exhibit 1a. BPS Disability Rates and Percentage Points Above State Rates⁶



³ National Center for Education Statistics, retrieved from https://nces.ed.gov/programs/digest/d21/tables/dt21_204.70.asp

⁴ Data calculated from MA DESE 2021-22 Enrollment Data for Students with Disabilities, retrieved from <https://www.doe.mass.edu/infoservices/reports/enroll/default.html?yr=sped2022>. Rates exclude single charter and regional vocational schools.

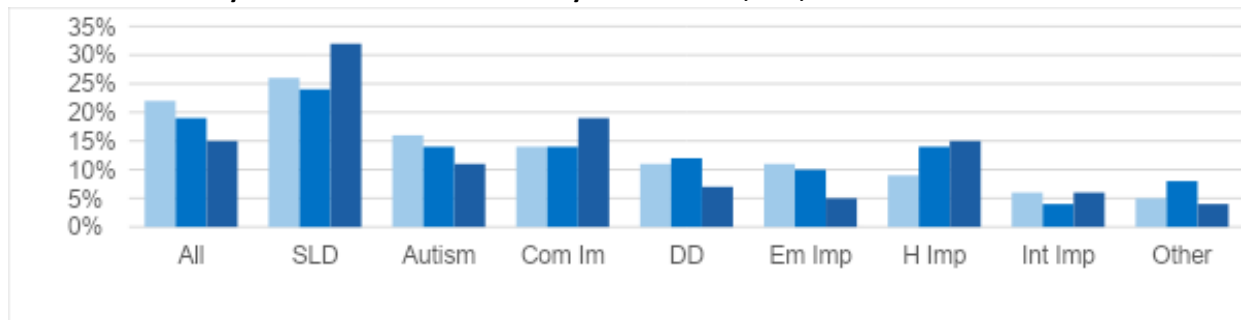
⁵ Although students with disabilities include those with Section 504 plan, for the purpose of this report the term disability refers only to students eligible under the IDEA and receiving special education pursuant to an IEP.

⁶ Source: BPS data provided to the Council Team, and 2021 state rate retrieved from <https://profiles.doe.mass.edu/profiles/student.aspx?orgcode=00000000&orgtypecode=0&leftNavId=305&>. Data for 2009-10 school year was not provided. Data for 2021-22 provided by BPS. NOTE: Unless otherwise stated, BPS representatives provided data for the school district.

Most Common Disability Rates

Seven disability areas are the most common. These are specific learning disabilities (SLD), autism, communication impairment (Com Imp or Comm), developmental disability (DD),⁷ emotional impairment (Em Imp), health impairment (H Imp), and intellectual impairment (In Imp). Exhibit 1b compares BPS, MA and national disability rates overall and for these areas. Overall, BPS’s disability rate is 7 percentage points higher than the national rate. Of all students with disabilities, the BPS composition of students with autism is higher than the state and nation (16 percent, 14 percent, and 11 percent, respectively). Three areas (SLD, autism, and communication) comprise 57 percent of all BPS students with disabilities.

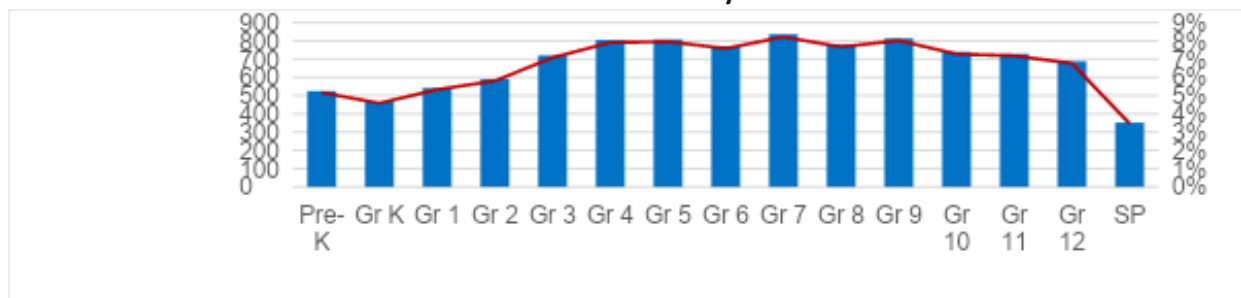
Exhibit 1b. Disability and Most Common Disability Rates for BPS, MA, and Nation⁸



Students with Disabilities by Grade

As shown in Exhibit 1c, the presence of students with disabilities is not consistent across grades. The number begins to increase from 2nd to 5th grade (from 590 to 809) and fluctuates between 6th and 9th grade (815) when the number starts to fall to a low of 688 in 12th grade. The low number (352) of students in grade “SP” reflects students special education, transition, and related services beyond 12th grade. The Exhibit also shows that in 4th through 9th grades, students with disabilities comprise 8 percent of all students.

Exhibit 1c. Number and Percent of Students with Disabilities by Grade⁹



⁷ The developmental disabilities group applies to students 3 to 9 years of age.

⁸ State and national data retrieved from

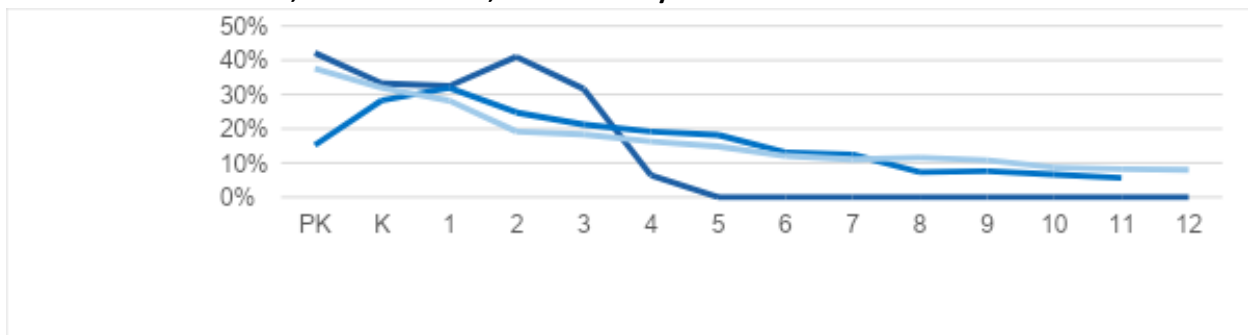
<https://data.ed.gov/dataset/idea-section-618-data-products-static-tables-part-b-count-environ-table2/resources> and table 3/resources.

⁹ Source: Enrollment as reported to MA DESE, October 2021. Includes students in out of district placements and excludes students enrolled in Horace Mann Charter Schools

Students with DD, Communication Impairments, and Autism by Grade

When considering students with the most common disability areas, rates for each disability area are highest in the lower grades but each group is different. For DD, rates are highest in PK through 3rd grade (ranging from 42 percent to 32 percent), then they drop because the age range for this area ends at 9 years, as required by state rules. Nationally, the area of communication is highest at the lower grades, which for BPS peaks at 32 percent for 1st graders. The area of autism, however, presents different consideration. Very high rates are present at PK through 1st grade (38 percent, 32 percent, and 28 percent, respectively). Since students in this area do not drop out of the autism category based on age or reduced need, it is more likely that these rates will continue to increase as students age. During focus group meetings, concerns were raised about the high number of children with autism entering the system from Early Intervention and who will require specially designed instruction.

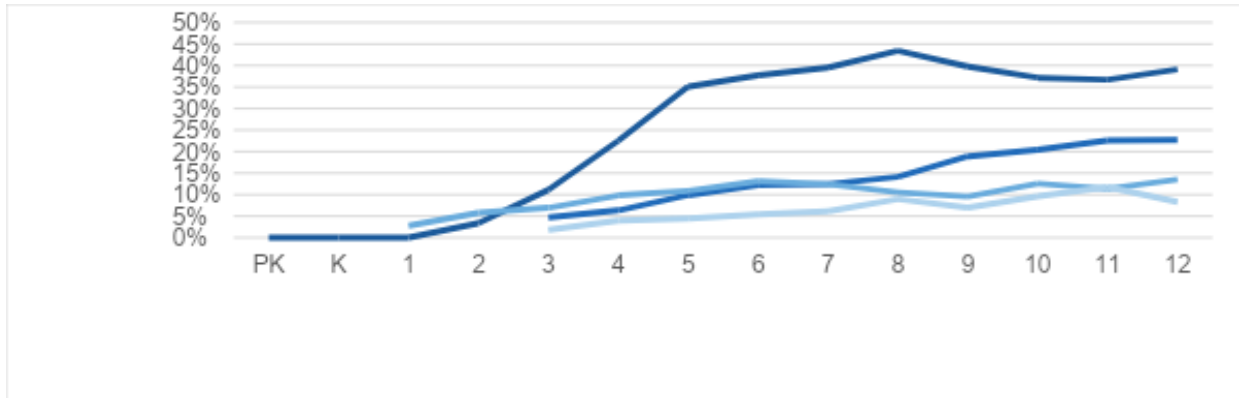
Exhibit 1d. Percent of DD, Communication, and Autism by Grade



Students with SLD and Emotional, Health, and Intellectual Impairments by Grade

The pattern for these disability areas are quite different from the group above. For SLD, the rate begins to increase dramatically from 2nd to 4th grade (from 3 percent to 23 percent), they continue to increase significantly from 4th to 8th grade (23 percent to 43 percent), and they level off and begin to decrease somewhat thereafter. As will be discussed later, this pattern brings into question the extent to which students are receiving necessary general education interventions during the early grades and how such instruction could later reduce a need for special education services.

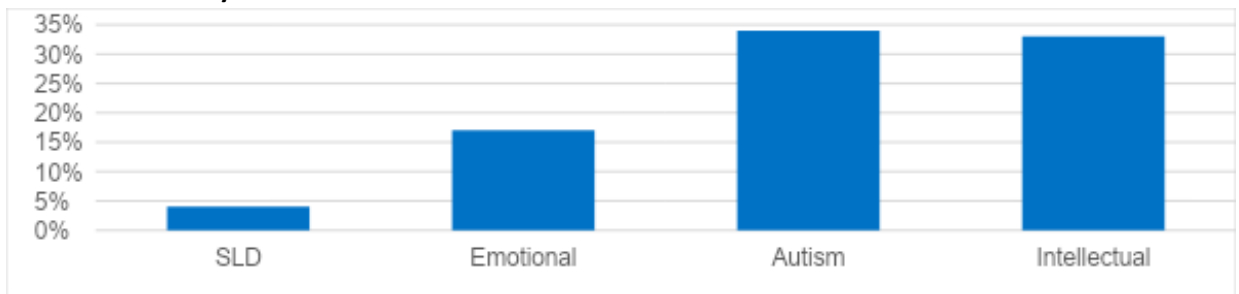
Exhibit 1e. Percent of SLD, and Emotional, Health, and Intellectual Impairments by Grade



Students in Grade “SP”

Students with disabilities who remain in school beyond grade 12 are primarily those with autism, and intellectual impairments (34 percent and 33 percent, respectively). A smaller proportion are those with an emotional impairment (17 percent) or SLD (4 percent). (See Exhibit 1f.) There were concerns shared on the transition process to support students and families with the options that exist for students post school.

Exhibit 1f. Disability Area Rates for Students in Grade “SP”

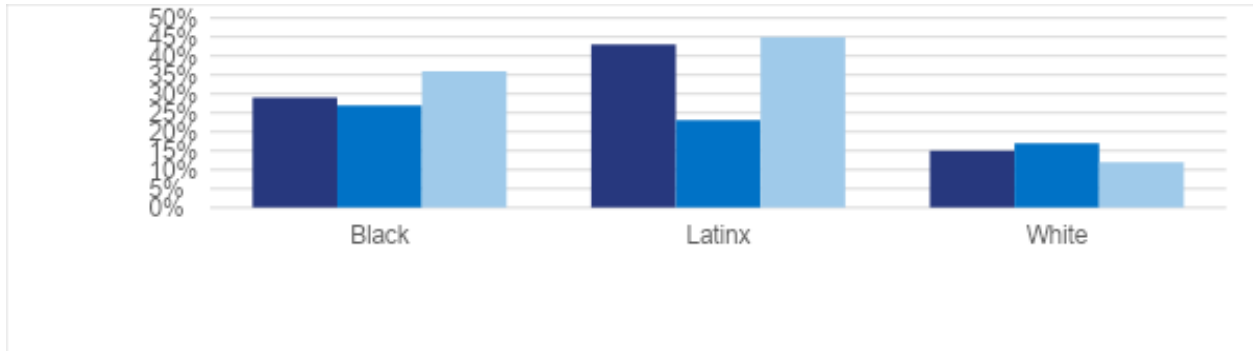


Disability by Race/Ethnicity

Data in Exhibit 1g shows all BPS students and those with disabilities by race/ethnicity.

- **Black students** comprise 29 percent of all students and their disability rate is a proportionate share of 27 percent all black students; however, they comprise 36 percent of all students with IEPs.
- **Latinx students** comprise 43 percent of all BPS students, but their disability rate is only 23 percent of all Latinx students of all students with IEPs, Latinx students comprise 45 percent.
- **White student** rates are more proportionate. They comprise 15 percent of all BPS students and 17% of all white students have an IEP. Of all students with IEPs, 12 percent are white.

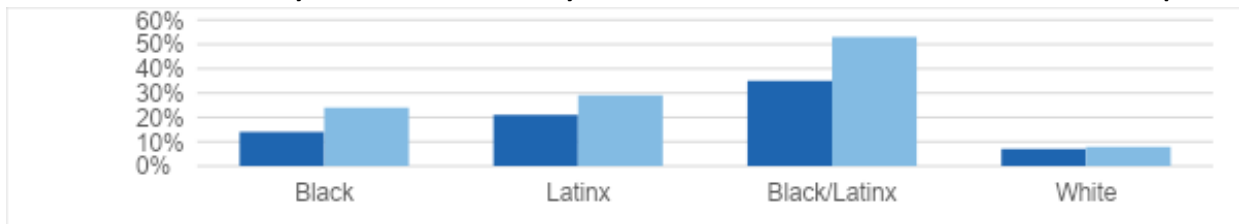
Exhibit 1g. BPS Total and Disability Rates by Black, Latinx, and White Student Groups¹⁰



Male Disability Rates by Race/Ethnicity

Overall black and Latino male students comprise a larger percentage of the disability group compared to their overall BPS student composition (see Exhibit 1h): black males (24 percent to 14 percent, respectively) and Latino males (29 percent to 21 percent, respectively). Together, they comprise 53 percent of the disability group but only 35 percent of all BPS students. White students are a proportionate 7 percent of BPS and 8 percent of those with IEPs.

Exhibit 1h. Male Disability Rates: BPS and SwD by Black, Latino, Black, Black/Latino, and White Groups



Disability Area Rates for Black, Latino, and White Male Students

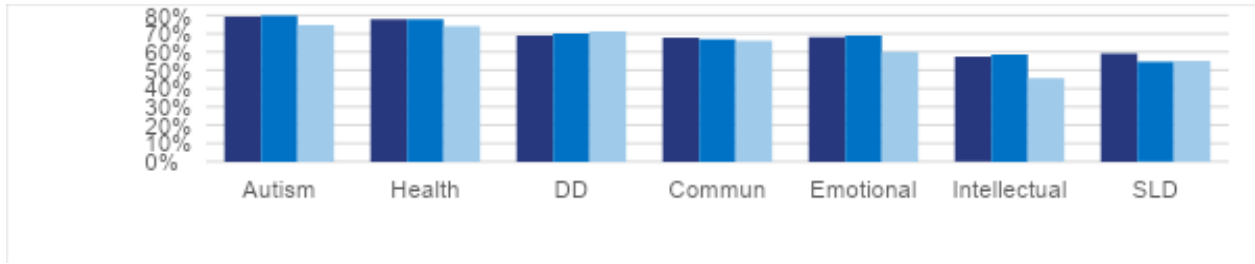
Overall, 48 percent of BPS students are male. Yet, as shown in Exhibit 1i the rates for black, Latino, and white males in every common disability area (except for white males with an intellectual disability) are much higher. Of all categories, SLD has the lowest rates for each of the three groups (59 percent for black and 55 percent for Latino and white). Intellectual impairment is next with rates of 57 percent, 59 percent, and 46 percent, respectively. The highest rates were posted for autism (79 percent, 81 percent, and 75 percent, respectively), and health impairment (78 percent for both black and Latino, and 74 percent for white males).

Exhibit 1i. Disability Area Rates for Black, Latino, and White Male Students¹¹

¹⁰ Nonbinary gender was not included in the race/gender aggregates. Numbers under 10 were suppressed for students from other racial groups. The Asian student group was not included because the numbers were small.

¹¹ Source: Enrollment as reported to MA DESE, October 2021. FRLP reported as BPS internal Economically Disadvantaged variable. Includes students in out of district placements and excludes students enrolled in Horace Mann Charter Schools Developmental Delay category includes students ages 3-9 only. BPS Enrollment Data, retrieved from

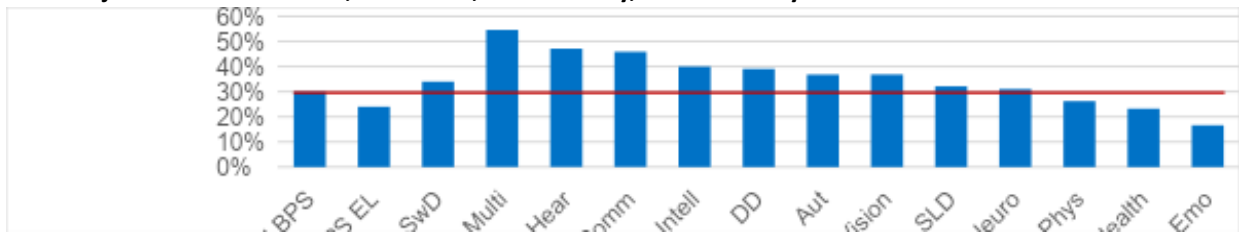
<https://www.bostonpublichttps://profiles.doe.mass.edu/profiles/student.aspx?orgcode=00350000&orgtypecode=5&>



ELs with Disabilities

Of all ELs, 24 percent have IEPs, but they comprise 34 percent of all SwDs. Their composition of several disability areas is much higher: multiple impairment (55 percent), hearing impairment (47 percent), communication impairment (46 percent), intellectual impairment (40 percent), developmental disability (39 percent), autism (37 percent), and visual impairment (37 percent). Their composition is lowest for the emotional impairment (17 percent) category. (See Exhibit 1j.)

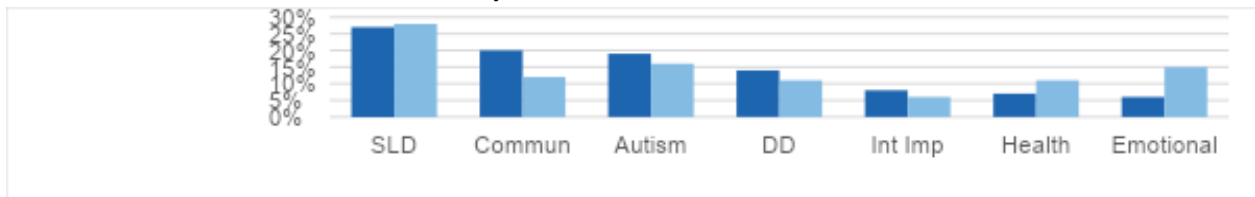
Exhibit 1j. EL Rates for All BPS, All BPS EL, All Disability, and Disability Areas



Disability Area Rates for ELs With and Without Disabilities

Data shown in Exhibit 1k compares rates for ELs with and without disabilities by the most common disability areas. Rates are most disparate for the areas of communication impairment (20 percent to 12 percent) and emotional impairment (6 percent to 15 percent). The communication impairment disparity raises the question of whether EL students are being identified as needing speech/language services because of a disability or to language acquisition reasons unrelated a disability. Some interviewees expressed concern that students with limited and/or interrupted formal education (SLIFE) may be identified as having a disability when they had not been previously educated or had gaps of several years.

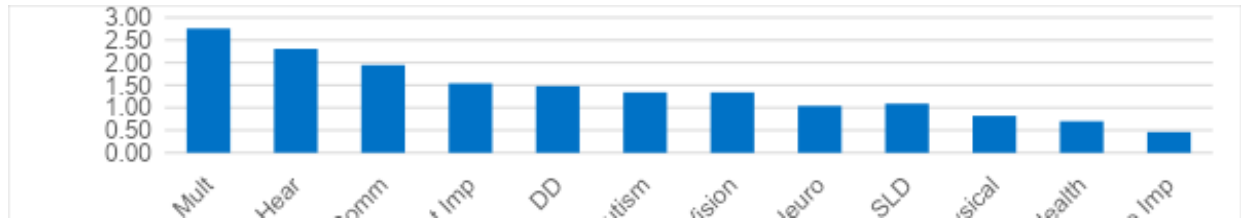
Exhibit 1k. ELSwD and Not ELSwD Disability Rates



Risk Ratios for ELs/Not ELs by Disability Area

Using a risk ratio measure¹² for comparing ELs to nonELs by disability area, ELs are 2.76 times more likely to be identified as having a multiple impairment, and almost twice as likely (1.95) to have a communication impairment. ELs are also more likely (2.3 times) to have a hearing impairment (2 percent for ELs and 1 percent for nonELs).

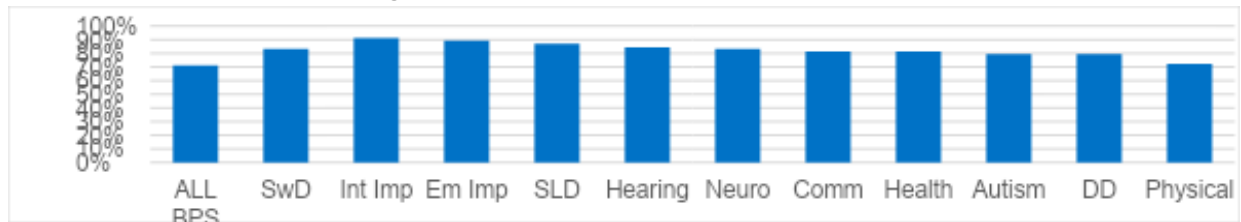
Exhibit 1I. Risk Ratios for All ELs Compared to Not ELs by Disability



Disability and Economic Disadvantage

Students with an economic disadvantage status are more likely to have an IEP, and their likelihood increases for various disability categories. (See Exhibit 1m). Overall, 71 percent of BPS students have a status of economic disadvantage, compared to 83 percent for students with IEPs. Rates are 10 to 20 percentage points higher than the BPS composition for intellectual impairment (91 percent), emotional impairment (89 percent), SLD (87 percent), hearing impairment (84 percent), neurological impairment (83 percent), communication impairment (81 percent), and health impairment (81 percent). Only the physical impairment group is comparable (71 to 72 percent).

Exhibit 1m. Economic Disadvantage (FRLS)¹³



OSE Policy and Procedure Manual (PPM)

The September 2022 PPM, version 1.4, references MTSS with the stated expectation that MTSS can minimize or eliminate barriers and improve student outcomes. This is accomplished when

¹² The risk ratio is used to compare the ratio of a targeted group of students to the comparison group of students. Values of 2 or higher are considered significant.

¹³ Source: Enrollment as reported to MA DESE, October 2021. Free Reduced Lunch Program reported as BPS internal Economically Disadvantaged variable. Includes students in out of district placements and excludes students enrolled in Horace Mann Charter Schools Developmental Delay category includes students ages 3-9 only. BPS all students data retrieved from <https://profiles.doe.mass.edu/statereport/selectedpopulations.aspx> Special Education Enrollment by Special Populations 2021-22 (Oct. 1, 2021) <https://www.doe.mass.edu/infoservices/reports/enroll/default.html?yr=sped2022> For SwDs, 81% of BPS compared to 56% for the state MA DESE 2021-22 School and District Profiles for Selected Populations Report

schools design equitable, tiered, universally designed systems of support that address students' academic and behavior/social/emotional well-being in culturally sustaining ways. The PPM includes links to DESE's MTSS website.

The PPM provides two "important" caveats to the provision of these supports before the consideration of a special education referral. The first is that a referral should be made promptly when a disability is clearly evident or suspected and known to be causing learning problems. The second refers to a parent's right to initiate a referral. But this caveat has another caveat that the referral is "not limited and never should be" ... "because the school district has not fully explored and/or attempted some or all of the available instructional support programs or any other type of interventions such as [through MTSS]." The PPM reinforces the state rule that principals must ensure documentation about the use of instructional support services is reviewed by the team when determining IEP eligibility.

The Council SST has several concerns about this guidance. First, clearer guidance is needed to differentiate between what may be a "clearly evident" disability and the terms "suspected and known to be causing learning problems." For example, clear evidence could be an incoming student with an obvious severe/profound intellectual impairment. It is less clear what other characteristics might be known to cause learning problems and form a suspicion of disability. It is precisely this set of circumstances that the MTSS framework, with the use of rigorous progress monitoring, is expected to address. The PPM's reference to parental referral and its second caveat is associated with these circumstances. Another concern is that BPS has not yet developed and implemented an MTSS framework consistently with DESE's guidance, which is comparable to others with which the Council SST is familiar. Section 2 addresses MTSS's developmental status with respect to this important foundational issue.

Considering Initial Special Education Evaluation Referrals

Educational literature and research has a long history of considering the general education support that is provided to students who are not meeting expected achievement and exhibiting disruptive behavior. One member of the Council's SST, working for the Office for Civil Rights (OCR) as early as the mid 1980's prepared findings of disproportionate representation of students with disabilities based on race/ethnicity that required the use of general education interventions and supports to address the issue. In 2004, the concept of Response to Intervention (RtI) was formally incorporated into the IDEA regulation to support specific learning disability eligibility. Several years later, the value of merging interventions and support for academic as well as behavioral issues, which had been addressed through the Positive Behavior Intervention and Supports (PBIS) framework gained momentum. Today, based on the Council SST's knowledge and experience, the MTSS framework is widely practiced across the nation, although its implementation is still inconsistent and not always based on the evidence practices that have been established across a wide range of literature and websites.

Massachusetts Hehir Report

In a 2014 review of special education in Massachusetts (MA), Thomas Hehir and Associates reported on large discrepancies among Commonwealth school district disability.¹⁴ In pertinent part, the authors expressed their belief that high school district identification rates were indicative of general education classrooms that were not sufficiently supporting all students. Based on their analysis of the correlation between disability rates and economic disadvantage, the authors expressed concern "... that special education referral serves to mask problems in the ability of general education to effectively educate students, particularly students from low-income backgrounds." (In this respect, it is noteworthy that the Commonwealth's 43.8 percent low income rate is a fraction of BPS's 71.2 percent rate.) To address this issue, the Hehir report focused on the provision of sufficient supports for students needing additional interventions within the general education classroom and referenced the use of a multi-tiered system of supports (MTSS) to intervene early with students experiencing difficulty. Focus group participants cited their experiences where special education has been viewed as a solution to general education instructional inconsistencies. For some, there is a perspective that students will not receive the assistance they need without an IEP.

Council of the Great City Schools' MTSS Booklet

Given the importance of MTSS and the need for effective implementation, the Council published a booklet to support this effort.¹⁵ The booklet reinforced the notion that many students having difficulty reading or math, or behavioral issues may not have received the classroom instruction and/or home supports necessary to develop foundational language and early reading skills.¹⁶ Factors other than a disability may account for students having difficulty in language and literacy (as well as numeracy). These factors may include the nature of a student's educational opportunity, as well as teaching practices or assessment tools that are insensitive to cultural or linguistic differences, for example. Other circumstances might include family circumstances, e.g., children who grow up without access to nutritious food, who live in households with challenges (i.e., lead exposure), and who have no written materials in the house. The Council booklet reaffirmed that when implemented with fidelity, MTSS can help mitigate these factors so that a special education referral is authentically based on a suspected disability (and not a lack of access to high quality instruction/support) that requires special education to address.

Massachusetts Law and DESE Rule for School Principal Responsibilities

According to MA law, prior to referral of a school age child for a special education evaluation, the principal must ensure all efforts have been made to meet the child's needs within the

¹⁴ Review of Special Education in the Commonwealth of Massachusetts: A Synthesis Report, Thomas Hehir and Associates, August 2014, retrieved from <https://www.doe.mass.edu/sped/hehir/>

¹⁵ Common Core State Standards and Diverse Urban Students: Using Multi-Tiered Systems of Support, at <https://www.cgcs.org/site/default.aspx?PageID=355#:~:text=Common%20Core%20State%20Standards%20and%20Diverse%20Students%3A%20Using,of%20instruction%20to%20assist%20them%20in%20achieving%20success.>

¹⁶ Statement by Dr. Reid Lyon before the House Committee on Education and the Workforce Subcommittee on Education Reform (2002); and *Minority Students in Special and Gifted Education* (2001)

regular education classroom. These efforts may include, but are not limited to, “modifying the regular education program, the curriculum, teaching strategies, reading instruction, environments or materials, the use of support services, the use of consultative services and building-based student and teacher support and assistance teams...”¹⁷ DESE’s regulation further states that these efforts and their results must be documented and placed in the student record. If a student is referred for a special education evaluation, principals are to ensure the instructional support services are reviewed by the team when determining eligibility.¹⁸

¹⁷ M.G.L. c. 71B, § 2, retrieved from <https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXII/Chapter71B/Section2>

¹⁸ Retrieved from <https://www.mass.gov/doc/603-cmr-28-special-education/download>

Recommendation 1. Special Education Referrals, Assessments, and Eligibility

By the beginning of the 2023-24 school year, improve consistency and appropriateness of referrals, assessments, and eligibility decisions for special education. Coordinate this activity with Recommendation 10, which involves the use of a panel of external resources to supplement and expedite BPS activities.

BPS's comparatively high identification rates of students found to need special education has existed since at least 1997, with rates disparate based on race/ethnicity accompanied by gender, and EL and economic status. These outcomes have a significant impact on teaching/learning and must be addressed with a highly charged focus/intent to change their underlying conditions. [Use the Racial Equity Planning Tool (REPT) for planning purposes.]

a. Data Review

With a diverse and multidisciplinary team of individuals inside/outside of OSE with expertise in use of evidence-based tiered interventions and progress monitoring, OSE review Exhibits 1.a - 1.k and their associated analysis to identify root causes for and address problematic patterns, such as those below. Use university partners in this inquiry to expand resources. This data should then be reviewed with the Superintendent, Senior Leadership team, Cabinet, School Superintendents, and school principals at the beginning, middle, and end of year.

- **Disability Rates Discrepant from State/Nation.** Higher rate for autism, and three areas (SLD, autism, communication) comprise 57 percent of all BPS students with IEPs. (Exhibit 1b).
- **Disability by Grade.** Overall large increases from PreK to middle grades and decrease in 8th grade (Exhibit 1c); changes in rates for DD, communication and autism (Exhibit 1d), and for students with SLD, emotional, health, and intellectual impairments. (Exhibit 1e).
- **Disability by Gender and Race/Ethnicity.** Disproportionately higher rates of black and Latinx students, and particularly for black and Latino males overall; and for black, Latino, and white males with particular disabilities. (Exhibits 1g – 1i). This includes risk ratio data.
- **ELs with Disabilities.** Disproportionately higher rate of ELSwD with IEPs, especially for certain disabilities. (Exhibit 1j – 1l). In addition, review data for long term ELs with IEPs to identify any higher eligibility rates overall/by disability. This includes risk ratio data.
- **Disability and Economic Disadvantage (ED).** Disproportionately higher disability rate of students with an ED status, particularly for certain disabilities. (Exhibit 1m). This includes risk ratio data.
- **Students Exiting Special Education.** Analyze rates of students exiting special education and practices for considering Section 504 eligibility and accommodations when appropriate.

b. Written Expectations

For areas that include the above, write expected guidance for:

- **Suspicion of Disability.** Student Success Teams (SST) to be used at every school site and training on a tool kit outlining processes to document 1) purpose for the SST referral, 2) expected participating team members (including student’s teacher), 3) documentation of instruction/intervention with clarity of intensity and frequency, 4) progress monitoring expectations, and 5) follow up meeting to determine whether interventions were successful or if additional supports are needed. For an EL, a member of the language acquisition team (LAT) or EL certified teacher will join the SST meeting to ensure the SST addresses EL language development and supports for intervention. The SST will follow established procedures for the suspicion of student need for special education, after incorporating the use of increasingly intensive tiers of intervention, progress monitoring evidence, and evidence of problem-solving activity; and include very limited circumstances for “immediate referrals.”¹⁹
- **Appraisal.** Evidence-based assessment practices that require change.
- **Eligibility.** IEP teams to make determinations that account for racial/ethnic bias and understanding of language acquisition. Use the Racial Equity Planning tool (REPT) and/or eligibility trend data by race/ethnicity and EL, as appropriate, which a psychologist or other personnel could provide to inform decision-making.
- **English Learners.** Section 5 includes recommendations for ELSwD.
- **Ineligibility.** Consideration of Section 504 eligibility and accommodations for any student not found eligible for special education and resumption of problem-solving to revise the type and/or frequency of interventions.
- **Exiting from Special Education.** Establish protocols for measuring progress on IEP goals and exit criteria for special education with supports.
- **Coordination with MTSS.** Coordinate these activities with Section 2 MTSS recommendations.
- **Postsecondary Transition.** Incorporate all written guidance and associated tools for the IEP team, students, and families on the options that exist for postsecondary education to support the transition of SwD to college and career opportunities. Focus should be provided on student disability categories of need, such as Autism and Intellectual Disabilities.

Include all changes in the office’s Policy Procedures manual.

c. Differentiated Professional Learning

Based on descriptions of written expectations, adjust BPS’s professional learning curriculum to address essential areas, and provide to all relevant district stakeholders the professional

¹⁹ See, for example, Louisiana Bulletin 1508 – Pupil Appraisal Handbook, §307 - Referral Process and §307.B for immediate referrals, retrieved from <https://doa.louisiana.gov/media/g0jbnrxn/28v101.pdf>.

learning they need to implement the recommendations related to SSTs, special education referral, evaluation, and eligibility. As part of this process, have the Office of Special Education and OMME department personnel collaborate to address the referral and assessment needs of ELs.

d. Data Analysis and Reports

Develop user-friendly summary reports for BPS's leadership team showing data like those in this report. If possible, report disaggregated initial special education referral data by the school the student attended at the time of the referral to identify outlier trends. Collect data showing decisions for special education eligibility without accompanying expected intervention and progress monitoring assessment documentation with personnel responsible for follow up action. Determine and communicate to schools and district departments the expectations for documenting interventions prior to the referral for special education.

e. Monitoring and Accountability

Consider the following actions for monitoring referral, evaluation, and special education eligibility practices, and to measure progress with key performance indicators.

- **Monitor expected referral, evaluation, and eligibility practices.** Supplement any state required record-review compliance model, with a case study review process that is conducted along with school-based personnel. This activity should be done at the school level, region level, and district level to determine what district procedures and tools need to be developed to address issues surfaced through the case study review process. Identify pockets of disproportionality and establish protocols for selecting/reviewing student files for these case studies, and for following up with school personnel/others to share lessons learned from these studies. Enable staff to observe best practices shown by others and to receive coaching to improve their knowledge and skills.
- **Key Performance Indicators (KPI).** With OSE/OMME representatives and the Office of Data and Accountability establish KPIs to measure initial referral data by school (including a menu of reasons for the referral) and eligibility decisions by disability area. Disaggregate data by such areas as language status, race/ethnicity, gender, economic disadvantage, foster care status (if available), and combinations of data. Sort data also by district and region. Consider how school reports can reasonably show outcomes with numbers fewer than 10. Establish ambitious but reachable targets with implementation of expected practices and report outcomes to central, regional, and school-based leadership teams, and others needing such information to improve their work. The monitoring of these KPIs is outlined in Recommendation 2f and 2g.

f. Time Frames

Execute activities by the beginning of the 2023-24 school year and establish interim dates for each of the components above.

2. Ensuring an Effective Multi-Tiered System of Supports is in Place

Overall, as discussed below, the Council SST found BPS has many important components necessary to implement MTSS effectively. But comprehensive written guidance does not exist to pull these components together into a single framework that schools can implement, and as educational literature has consistently described. To effectively address the high proportion of students with disabilities, it will be essential for BPS to implement an effective MTSS process.

DESE has developed a robust website sponsored by its Systems for Student Success Office that includes a Blueprint, Mobilization Guide, Self-Assessment, and Resources, each with links to easily accessible and user-friendly information.²⁰ The website also has a rich assortment of tools, resources, academies, and other professional development opportunities. It also includes a vendor list with pre-approved partners and grant opportunities. However, there is little evidence that this information has been embraced and used to inform BPS guidance and practices.

Various stakeholders, as well as the DESE report, addressed the significant administrative and associated programmatic changes, that BPS has experienced over the last 17 years. After Thomas Payzant's 11 year tenure as superintendent (1995-2006) and Carol Johnson's 6 year tenure (2007-2013) there have been six superintendents, including four interim superintendents (with five having this role during the last decade). With many stakeholders holding her in high regard and great hope, on September 26 , 2022, Mary Skipper took on this role. As with other BPS initiatives, such as activities to support more inclusive and effective instruction for students with disabilities, the district's momentum to develop and implement MTSS has suffered as a result of BPS's frequent leadership change. Initial steps to provide written guidance and structure with strong collaboration and interface between academic and behavioral support started and stalled. As a result, the Council SST was informed that MTSS "... is still foreign in many schools, not yet embedded in culture, and no one is making sure it is."

BPS's District Curriculum Accommodation Plan (DCAP) working draft provides some guidance for MTSS. The Plan defines equitable MTSS as

an evidence-based framework that establishes a tiered system to define (academic, healing-centered and culturally/linguistically responsive) expectations for educators (schools and district) about what should be provided in order to ensure that all students have access to culturally responsive and rigorous learning opportunities. Educator mobilization of targeted and intensive tiered support for students is fluid and not solely determined or defined by specific designation, such as identified varying abilities and multilingual assets. Rather, the determination is supported by data from universal screeners, diagnostic assessments, progress monitoring, and qualitative data on how students and families report their learning experiences. Ultimately, Equitable MTSS is effective when the system works on behalf of

²⁰ Retrieved from <https://www.doe.mass.edu/sfss/>.

students and families to ensure that students learn, grow, get what they need, and become agents of change.

The DCAP states that it is based on state law mandating such a plan “designed to assist Principals in ensuring that all efforts have been made to meet students’ needs in regular education and avoid unnecessary referrals to special education.” A chart shows three tiers of teaching materials by grade level (KO-2, 3-6, and 7-12) for literacy, math, social/emotional learning, and multilingual learners language supports. In addition, the DCAP provides supports for general education classroom teachers that lists a description of Universal Design for Learning (UDL) with links to additional information, and a description and lists of universal accommodations. The text does not refer to interventions, which Tier 1 also incorporates and are different from accommodations.²¹ However, the DCAP includes the Goalbook Toolkit to support educators with links to instructional design in seven areas, including social emotional learning/executive functioning.

The DCAP does not include information about the collection and review of data using a problem-solving process or using that data for instructional decision-making and progress monitoring. It does not discuss how the SST uses such information to consider interventions or, when appropriate, a special education evaluation referral. Furthermore, DESE found “[s]taff are not familiar with the plan, and it is not consistently implemented across the district. Furthermore, staff interviews indicated that students are not always provided with appropriate services and support within the general education classroom including, but not limited to, direct and systematic instruction in reading and services to address the needs of children whose behavior may interfere with learning.”²² DESE required BPS to create a working group to review the DCAP and ensure it provides universal accommodations and resources to be connected to the work of the MTSS team. This was expected to be completed August 25, 2022.

Without comprehensive written guidance and professional development driven by a cohesive set of standards, stakeholders shared their perspective that MTSS implementation varies from school to school and has not been consistently embraced in accountable ways. BPS does have some foundations upon which staff could build substantive MTSS practices.

Academic Supports

Stakeholders shared that BPS’s curriculum scope, sequence, and pace depends on the materials a teacher uses rather than using materials in a way that aligns with a commonly understood district standard scope, sequence, and pace. This approach puts an undue burden on students transferring schools and impacts the effectiveness of any centralized effort to support

²¹ As the DCAP explains, accommodations change ways students can access information and demonstrate learning. They represent a change in presentation, responses, settings, and/or testing/scheduling. Interventions are targeted instruction designed to improve a specific skill or to apply an existing skill to new situations, such as scaffolding. Retrieved from

<https://www.understood.org/en/articles/the-difference-between-interventions-and-accommodations>.

²² CR 18 Responsibilities of the school principal.

teaching/learning through support for professional development. DESE found that while BPS's adoption of MassCore will support improved student outcomes over time, access to consistent graduation standards and advanced coursework remains highly inequitable across student groups. Also, adoption of high-quality high school instructional materials is inconsistent across the district.

Nevertheless, BPS has taken steps to improve students' academic achievement by focusing on equitable literacy, dyslexia screening, and rules based reading. Various types of personnel, such as academic interventionists and coaches are available, and a data inquiry facilitation (DIF) process has been developed. To improve outcomes for SwD and ensure they have appropriate access to content standards aligned text and instruction, guidance on how SwD will be engaged with the district's curriculum framework will be needed.

Equitable Literacy

This school year, BPS adopted Equitable Literacy for a three year districtwide instructional focus. The initiative is designed to address the needs of traditionally underserved students, e.g., black students, Latinx students, English learners, and students with disabilities. According to DESE, interviewees shared that this was the first adoption of a unifying academic initiative in recent memory. It was reported that although many schools have adopted district-recommended, high-quality instructional materials, implementation at the school level is inconsistent.

The district also initiated professional learning for *LETRS*[®] (Language Essentials for Teachers of Reading and Spelling), which teaches reading instruction fundamentals (phonological awareness, phonics, fluency, vocabulary, comprehension, writing, and language). With training continued this year it is expected that BPS will achieve its goal to reach all K-2 teachers who will approach graduate level literacy acquisition.

To support the initiative, BPS has designed training for principals and instructional learning teams (ILTs) focusing on the science of reading development. The Equitable Literacy Course Catalog was published for SY22-23 to support the expected 15 hours of school-based professional learning. Various aspects of school autonomy have impeded the initiative. DESE reported that principals have discretion regarding use of the catalog contents, and prioritized school-level coaching/ collaboration time varied significantly by school. Further, BPS reported that although training rates are high, they would be even higher with less school autonomy. BPS had not yet built a system for monitoring effective implementation and its impact on students. Absent these safeguards and oversight, implementation of the equitable literacy framework varies greatly at the school level.

Equitable Literacy Coaches

BPS has nine Equitable Literacy coaches, one for each region. Also, the K-8 regions each have an early childhood equitable leadership coach. According to written information BPS provided, the coaches support school leadership teams with structures and practices that ensure all students, including those with IEPs, have highly effective, research-aligned, literacy instruction. This includes such activities as supporting the analysis of literacy data with attention to subgroups

and the creation of action plans; and helping to create schedules with access to tiered instruction/interventions.

Through focus group sessions the Council team learned there is a need to expand collaboration between Equity Literacy and OSE staff to reach all special educators, including those teaching in substantially separate classrooms. For example, on the day of one focus group meeting various teachers attended literacy training but special educators were not involved.

Dyslexia Screening and Rules-based Reading/Multi-sensory Reading Instruction

Pursuant to Massachusetts Dyslexia Guidelines, BPS requires universal screening of students in K1 through grade 2. Two screening tools are in use, the PALS/Heggerty for K1 (twice each year) and NWEA MAP Fluency for K2 through grade 2 (three times each year).

BPS has various reading programs for students at each tier, including two well-regarded multi-sensory reading programs at the Tier 3 level (Wilson and Orton-Gillingham). BPS representatives informed the Council SST that BPS provided Wilson training to special educators. However, a data system was not developed to track teachers who have been trained. Training for general educators was not mentioned although these reading programs are designated as a Tier 3 resource. In addition, BPS does not have a database to show who was trained, where they are teaching, who they are teaching, and whether they are using the program. Furthermore, teachers are not able to arrange flexible groups of students when their schedules are not arranged with this need first considered unless the school designs unique schedules.

Academic Interventionists

The MOU documented BPS's commitment for educators to provide academic instruction/interventions within a MTSS framework consistent with the needs of students. Various examples of educators listed were resource teachers, ESL teachers, and Tier 2 interventionists. Additional examples listed under an Allocation Note are coaches, facilitators, and directors or coordinators. These educators are expected to provide services directly to students consistent with SST and IEP team recommendations.

The MOU also specifies that personnel who provide academic interventions should be allocated to schools using a formula that considers numbers of students with IEPs, English learners, and the Opportunity Index. Also, to be considered are reading scores and the intensity of IEP services. Another provision regarding the consideration of multi-certified teachers is addressed in greater detail below – under support for special education.

Some focus group participants shared their perception that interventionists are not equitably distributed among schools. For example, some schools may choose to fund reading specialists while other schools with need do not. This autonomy impact on teaching/learning and meeting student needs is addressed later in this report.

Instructional Leadership Teams

According to information provided to the Council SST, instructional leadership teams (ILTs) are at every school and are responsible for ensuring that Universal Design for Learning (UDL) tenets are in place in all classrooms. They are to support the student support team (SST) process and provide support and guidance to teachers for curricular accommodations. However, without necessary professional learning, support, and monitoring, it is not possible to determine the extent to which these expectations are being met and teachers are implementing these practices. The districts should develop protocols to ensure these supports are provided and are reflected in the classroom, perhaps through school walkthrough results.

Formative Assessment

As discussed in further detail below, BPS's SY22-23 Assessment Memo, which was updated August 16, 2022, describes the district's short cycle of formative and interim assessments with results that lead to the use of periodic (Tier 2) or high frequency (Tier 3) progress monitoring. The memo links the CRIOP, which is described in Section 15, as providing examples of classroom embedded formative assessment practices. According to a district representative, a new equitable literacy walkthrough tool was created this fall.

Data Inquiry Facilitation Process

A Data Inquiry Facilitation (DIF) process developed by the Office of Data and Accountability has established a culture of data disaggregation to improving outcomes for various student groups. DESE reported that with the recent decision to concentrate the DIF process in Transformation Schools, many schools have lost access to this valuable tool. BPS has a goal to expand DIF coaching to additional schools in the future. DESE's report gave positive feedback about this initiative that began in the early 2010s.

Social/Emotional Wellness and Behavior Health Supports

The Council SST received information reflective of a strong Boston behavioral health collaborative and tiered behavior supports sponsored by the Office of Special Education's (OSE) behavioral health division, a social/emotional support infrastructure sponsored by the Social Emotional and Wellness Supports (SEWell) department, and social workers housed under the Executive Director of Student Support. There was little if any information showing how personnel from these divisions leverage their considerable human resources, such as psychologists, social workers, and nurses to support students and school personnel. For example, the SEWell Menu of Supports²³ utilizes an MTSS framework with a comprehensive school-based approach, but there is no clear reference to the role that teaching and learning academic material may play in a student's social/emotional wellness. Furthermore, there is no

²³ Retrieved from

<https://www.bostonpublicschools.org/cms/lib/MA01906464/Centricity/Domain/162/SELWellnessSC03.2018FINAL.pdf#:~:text=BOSTON%20PUBLIC%20SCHOOLS%2011%20Multi-tiered%20systems%20of%20support,problem-solvin%20to%20integrateacademic%20and%20behavioral%20instruction%20and%20interventio.>

reference to OSE and that office's behavioral health collaborative and how it might interface with school-based activities. Moreover, OSE has its own Behavioral Health MTSS framework that guides their work, depending on a psychologist's full time equivalent (FTE) presence in a school.²⁴ In addition to daily supports students and school personnel need, maximum collaboration between these offices is needed to be prepared to address any intermittent and unexpected crisis that may occur. Recommendations for this issue are included below in Section 8.

Recommendation 2. Comprehensive MTSS Framework

Establish and implement an MTSS framework consistent with information from DESE²⁵ and the federally funded MTSS Center.²⁶ By February 28, 2023, post an MTSS Superintendents Circular that describes in broad terms the district's MTSS framework.

Unlike many districts without such a framework, BPS has evidence for much of the components necessary for implementation. MTSS evidence-based practice is a necessary foundation for improved overall student outcomes, including their academic and social/emotional well-being, and to ensure students are not referred for special education evaluations because they lacked the instruction needed to learn and engage in positive behavior. As DESE's 2022 report stated, "without consistent delivery of effective, rigorous instruction in all grades and subjects, clear communication of expectations, and professional development, the district cannot achieve its goal of closing achievement gaps for historically marginalized student groups."

a. Leadership Teams

Have leadership teams at the district, regional, and school levels to support the MTSS framework's implementation. Have each team represent personnel having direct/indirect roles related to the improvement of teaching/learning for all students, including English learners and students with disabilities. Establish clear roles/responsibilities for teams at each level. Based on the district's comprehensive plan, have each team describe how they will oversee MTSS implementation through data collection/review, monitoring for consistent implementation, training/technical assistance, school walk-through protocol, and incentives/consequences when expectations are not met, absent reason. **Complete this activity by January 2023.**

- **BPS MTSS Leadership Team.** Identify individuals representing central office units with the diverse representation of those directly/indirectly supporting equitable literacy (and other academic areas as desired) and positive behavior support. Include OSE, OMME, and others having expertise in the education of ELSwD. Have the Senior Deputy Superintendent of Academics oversee this collaborative action.

²⁴ OSE Behavioral Health Services PowerPoint (April 4, 2022) provided to the SST.

²⁵ Retrieved from <https://www.doe.mass.edu/sfss/mtss/> and

²⁶ Retrieved from <https://mtss4success.org/resource/mtss-fidelity>.

- **Regional MTSS Leadership Team.** Have each School Superintendent establish an MTSS leadership team composed of similar central office personnel who work directly with schools, as well as school-based personnel with relevant areas of expertise.
- **School-based Leadership Teams.** Expect each principal (not the COSE) to lead an MTSS leadership team composed of individuals collectively representing the needs of students throughout the school, including a parent/family representative. By considering all human resources available to each school, have teams leverage their reach through collaborative rather than isolated practices. This team is different from an SST that is formed to support a particular student, and the work could easily be addressed by the school based Instructional Leadership Teams.

b. Written Expectations

Consider the following for this purpose –

- **MTSS Framework Description.** Describe the district’s MTSS framework and how it includes 1) a continuum of integrated academic, social, emotional, and behavioral instruction that incorporates universal design for learning (UDL) principles/accommodations, and intervention supports that are evidence-based and culturally/linguistically responsive and incorporates universal design for learning principles; 2) screening generally conducted three times/year to identify students who may be at risk for poor outcomes and need additional academic, social, emotional, or behavioral supports; 3) progress monitoring that uses valid reliable tools and processes to assess performance, quantify improvement or responsiveness to instruction/intervention, and evaluates their effectiveness; and 4) data-based decision making with data analysis and problem solving through teaming to make decisions about instruction, intervention, and, as appropriate, support referrals and determination of need for special education.²⁷
- **Student Involvement.** Explain that the MTSS framework is inclusive of all BPS students, including students with disabilities, English learners, and ELSwD. The framework also includes students who are gifted and may require enrichment or interventions to meet their needs.
- **Tool Kit.** Post all guidance necessary to implement the district’s MTSS framework through an MTSS Toolkit. Gather useful information from BPS documents and DESE’s website to identify and fill gaps. Involve representatives from MTSS leadership and regional and school teams to review informational drafts for clarity. BPS’s Equity & CLSP Toolkit²⁸ provides an excellent example of a document that gives information in a comprehensive, visually attractive, and user-friendly manner. Include details that –
 - Describe the MTSS framework and all associated components.

²⁷ Center on MTSS, retrieved from <https://mtss4success.org/essential-components>.

²⁸ Retrieved from <https://sites.google.com/bostonpublicschools.org/ogequityandclsptoolkit/criop>.

- Share expectations of how MTSS will be implemented. For example, collaboration required between various departments and OSE for professional learning on topics like equitable literacy, which is relevant for students with IEPs participating in the regular MCAS.
- Provide a menu of supports that is updated at least annually.
- Link information, such as the revised District Curriculum Accommodation Plan (DCAP). DESE’s 2022 report required a group of people to review the DCAP to ensure it provides universal accommodations/resources to be connected to the work of the MTSS team.
- Provide a BPS curriculum scope, sequence, and pace to support instruction and materials that are aligned. In this way, students transferring schools are on track to build on their prior learning, and professional learning can be supported more effectively.
- Post professional learning opportunities having content consistent with BPS expectations.

c. Map Resources, Analyze, and Fill Gaps

Consider the following for this purpose –

- **Curricular Materials/Interventions.** Under the districtwide leadership team’s direction, gather together BPS’s current materials for curricular implementation and tiered interventions for equitable literacy, along with other desired curricular areas, such as math, and for social/emotional learning. Also identify personnel used to provide interventions for academic achievement and behavior-social/emotional well-being. Consider personnel who are not classroom teachers, such as academic interventionists, reading specialists, school psychologists, social workers, speech/language pathologists, nurses, occupational therapists, and any other personnel with knowledge/ skills in this area.
- **Analyze Gaps.** Compare current inventories of material resources to evidence of effectiveness. Also compare personnel currently providing academic and/or positive behavior-social/emotional-wellness interventions/supports to need. Use data associated with caseloads and other information for this gap analysis. Use this information to identify material and physical resources needed to meet expectations for effective MTSS implementation. For human resources,
 - **Complete the above actions by February 27, 2023.**
- **Fill Gaps.** By the beginning of SY 2024-25 meet material resource gaps with phased-in purchasing. Use a formula-based FTE allocation of personnel to schools for various purposes, such as tiered reading intervention (including rules-based reading), and positive behavior-social/emotional support. Base this formula on such student characteristics as low performance, economic disadvantage, English learners, students

with disabilities, ELSwDs, the Opportunity Index, etc. Use representatives of the central, regional, and school-based teams to give upfront feedback for the ingredients of the formula and review successive drafts. During the formula development phase, apply it to representative schools for results, and share with the team representatives. By the beginning of SY2024-25, have human and physical materials in place to meet these needs based on interim benchmarks.

- **Recruitment and Hiring.** Establish a highly effective recruitment campaign using all available internal/external central office and outside resources to fill existing/future vacancies. Concurrently, review/adjust human resource procedures to expedite current practices. Use current benchmark vacancies by such indicators as type, any spoken language needs (e.g., bilingual Spanish), and duration of vacancy. Report, through progress monitoring, to the Superintendent/Deputy Superintendent and others as appropriate. Start this activity immediately and begin reporting [by the end of January 2023](#).

d. School Based Implementation

Use the School Improvement Plan with an added requirement for MTSS [beginning with SY2023-24](#). Have indicators that reflect key implementation requirements, such as effective use of a school leadership team, outcomes based on tiered academic and positive behavior/social-emotional support, professional learning, and additional supports needed to meet student needs, etc. Obtain feedback from representative regional and school-based leadership teams to ensure the component is clearly written and understood. Annually, revise the plan template as more information is available about the MTSS framework implementation and schools have more material and human resources in place.

e. Professional Learning

Have professional learning in place with the following components. At least annually review the curriculum, materials, and information that is shared to ensure it is faithful to the MTSS framework.

- **Curriculum.** Based on the district's MTSS framework and written expectations, establish a professional learning curriculum that will be used to train all personnel expected to carry out aspects of the framework. Include in the curriculum, to the maximum extent possible, information for all relevant training sessions. Use a school-based tool to enable regional superintendents and principals to track school personnel are receiving training in all necessary areas.
- **Training Materials.** Design foundational MTSS framework materials that can be used for different training purposes.
- **Training Elements.** Have professional learning include the following elements—

- **Cross-Functional Teams.** Cross-train individuals from different central office departments to ensure a common language and understanding of MTSS is applied across the district and with schools.
- **Differentiated Learning.** Ensure professional learning is differentiated according to the audience skills, experience, and need.
- **Multiple Formats.** Use multiple formats (e.g., videos, webinars, and narrative text) to maximize the reach of training.
- **Coaching/Modeling.** Maximize the use of coaching and modeling to support teachers and other personnel needing assistance.
- **School Walk Throughs.** Modify existing walk-through templates to embed critical elements of the MTSS framework. Use an electronic protocol to quickly capture information from classroom visits to identify areas of need and follow-up with assistance.
- **Exemplary Implementation Models.** Collect and share through multiple virtual/in-person forums best practices, lessons learned, victories, and challenges in implementing MTSS for all students. Encourage and facilitate staff visits to exemplary schools and communicate models that set aside time for that to happen.
- **Learning Survey.** Develop/use for each session a short, automated participant survey to receive feedback, such as appropriate for the participant’s level of existing knowledge, suggestions for improvement, etc.

Time Frame: **By the beginning of SY2023-24.**

f. Data Analysis

Consider the following for this purpose –

- **Key Performance Indicators.** Review current and develop new key performance indicators and ensure they are disaggregated by all subgroups, including disability/ELs, and 504. Sort disability data by educational environment and EL data by level of proficiency. If such data is too small to publish, keep it confidential but make it available to central, regional, and school leaders and OSE/OMME personnel to inform decision making. Collect and report progress monitoring data by these subgroups to facilitate school-based problem-solving and informed decision-making. In addition, determine how EdPlan can be used in conjunction with Panorama or independently to collect data and report student progress on IEP goals. Ensure School Superintendents, school leaders, and all personnel who support schools with MTSS implementation have access to data/reports. Implement this component **by the beginning of SY2023-24.**
- **School Superintendent Data Checks.** At least twice each year have School Superintendents discuss data with their group of principals on prioritized KPIs to identify outcome patterns, anomalies, support needed, and follow-up activities. Also, at least

quarterly, have School Superintendents discuss with each principal school data for these same reasons and how they are being addressed within the school QSIP. Establish a protocol for these conversations, for example that student groups with large achievement and/or behavior-social/emotional-wellness gaps are addressed. At each of these meetings, include central office support personnel who collaborate with the superintendents and their sets of schools to help address needed follow up action.

- **Data Base for Orton-Gillingham Trained Teachers.** Establish a data base on teacher trainings and participation to support decisions about available resources and future training needs.
 - **Time Frame: By the beginning of SY2023-24.**

g. Monitoring and Accountability

Consider the following for this purpose –

- **KPIs.** With representatives from central, regional, and school based leadership teams, review a draft for a universal set of KPIs for achievement and behavior-social/emotional wellness. Review all BPS KPIs embedded in all current district representations of data (including drafts) having targets against which progress is measured. Disaggregate data by areas such as language status, race/ethnicity, gender, economic disadvantage, disability and placement, foster care status (if available), and combinations of data. Sort data by district and region. Consider how school reports can reasonably show outcomes with numbers fewer than 10. Establish ambitious but reachable targets with implementation of expected practices and report outcomes to central, regional, and school-based leadership teams, as well as others needing the information to improve their work.
- **Monitor Implementation Expectations.** Explicitly state and monitor implementation of practices that BPS expects, such as implementation of equitable literacy, use of district-recommended materials, and professional development expectations, which may need union collaboration. Enforcing such expectations requires BPS to address school autonomy. Action must be taken, however, when school autonomous practices are found to be associated with lack of student achievement and/or positive behavior/social-emotional wellness is negatively impacted. Other areas of expected implementation would be MTSS and UDL. However, for any expected practices BPS must first ensure sufficient training has been made available.
 - **Time Frame: By the beginning of the SY2023-24.**

h. Broad Framework Communication and Feedback

Have the District Leadership Team (DLT) design protocols for feedback loops involving central, regional, and school personnel, parents, and the community for the DLT to learn about barriers and act on issues that cannot be resolved without its attention.

3. Achievement Outcomes for Students with Disabilities, Including English Learners,

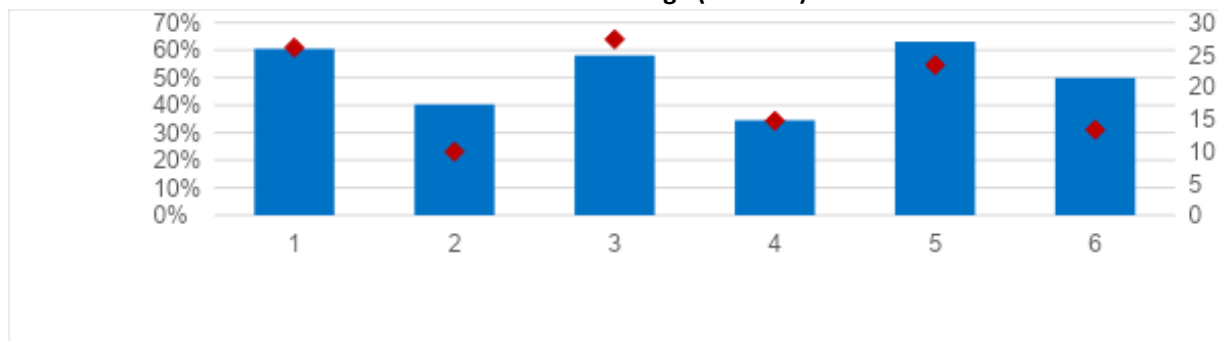
Across multiple interviews, including staff from multiple departments, addressing student achievement was rarely mentioned. Instead, discussions and feedback focused on adult structures and needs, and student decisions based on level of impact on classroom and building management. This section addresses multiple indicators associated with achievement outcomes for students with disabilities. Several sets of data are related to the U.S. Department of Education’s requirement that states use a uniform State Performance Plan (SPP) template to measure various achievement outcomes for students with disabilities, which are compared to state established targets, which are published on state websites. Additional data was provided by BPS. Overall, the data below are associated with achievement, AP and honors completion, graduation/dropout, postsecondary outcomes, attendance, and suspensions.

Outcomes for Children 3 through 5 Years of Age

One of the SPP indicators pertains to children with disabilities three through five years of age. Three areas are addressed: appropriate behavior (behavior), acquisition/use of knowledge and skills (knowledge/skills), and positive social/emotional skills (social/emotional). These areas are measured by two criteria: children who substantially increased their performance upon exiting the program and those who exited within age expected development. As shown in Exhibit 3a, BPS lags behind state targets in all six areas.

- **Substantially Increased.** BPS rates were highest for social/emotional (63.1 percent) and lowest for skill acquisition (58.1 percent). These rates were 23.4 and 27.4 percentage points below state targets.
- **Age Expected Development.** BPS rates were highest for social/emotional (50.0 percent) and lowest for knowledge/skills (34.6 percent). These rates were 13.3 and 14.4 percentage points below state targets. Of all six areas, BPS’s rate for appropriate behavior/within age expectations (4.03 percent) was a relatively low 9.9 percentage points below the state target.

3a. Outcomes for Children with Disabilities 3-5 Years of Age (2020-21)²⁹



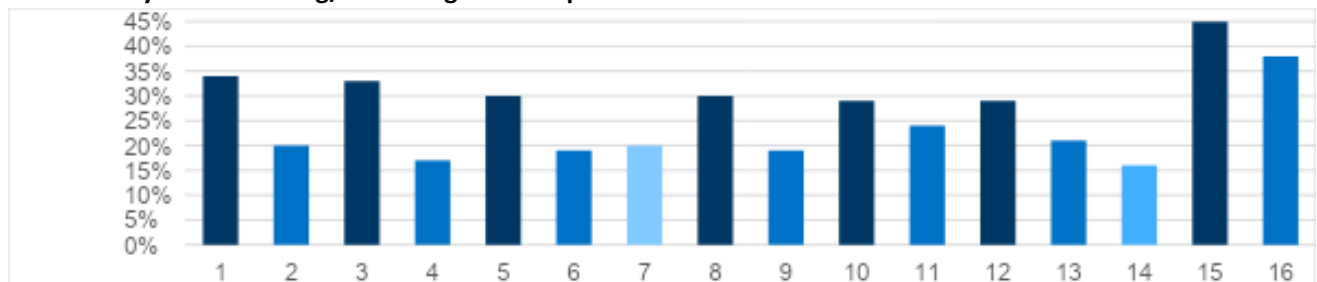
²⁹ Students with Disabilities, retrieved from https://profiles.doe.mass.edu/gis/sped_map.aspx?orgcode=00350000&.

MCAS Outcomes

Exhibit 3b shows the percent of students with IEPs with a score of at least proficient on the MCAS. According to DESE, 2021-22 was a benchmark year so no state proficiency target had yet been established.³⁰

- **ELA.** At the elementary level, proficiency rates ranged from 3rd grade’s 34 percent to 7th and 8th grade’s 29 percent.
- **Math.** Rates ranged from 7th grade’s 24 percent to 4th grade’s 17 percent.
- **Science.** Fifth grade rates were 20 percent and 8th grade rates were 26 percent.
- **10th Grade.** Compared to 8th grade scores, ELA rates increased to 45 percent (a 16 percentage point increase), and math scores increased to 38 percent (a 22 percentage point increase). These significant increases are likely the result of 10th grade IEP participation rate decreases and alternate assessment rate increases. Accordingly, the significantly higher 10th grade proficient/above outcomes for students with IEPs are probably the product of decision-making resulting in substantially fewer students participating in the test, rather than authentic achievement increases. See Exhibit 3c for more information about this issue.

3b. Disability Rates Meeting/Exceeding MCAS Expectations³¹



Comparison of Grade 8 and 10 ELA/Math MCAS Participation and MCAS-Alt Testing

In high school compared to 8th grade, lower rates of students with IEPs participated in the MCAS and higher proportions of all students tested took the MCAS-Alt. (See Exhibit 3c.)

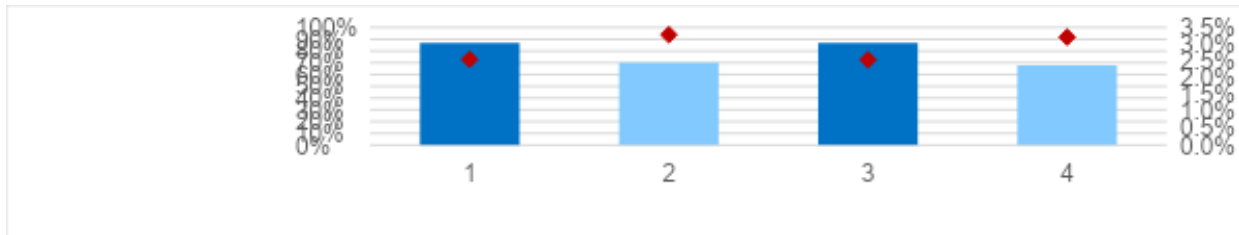
- **ELA.** Of all students with IEPs, 87 percent of 8th graders and 70 percent of 10th graders took the MCAS. Of all students tested who took the MCAS-Alt, 2.6 percent were in 8th grade and 3.3 percent were in 10th grade.

³⁰ Id.

³¹ BPS Source: MCAS data as reported by DESE, Spring 2021. Excludes students in Horace Mann Charter Schools and includes students in Out of District placements. Note: STE results in spring 2021 do not include grade 10, because students in the class of 2023 were not required to take the STE test. Spring 2022 MCAS data not currently available.

- **Math.** Of all students with IEPs, 87 percent of 8th graders and 68 percent of 10th graders took the MCAS. Of all students tested who took the MCAS-Alt, 2.5 percent were in 8th grade and 3.2 percent were in 10th grade.

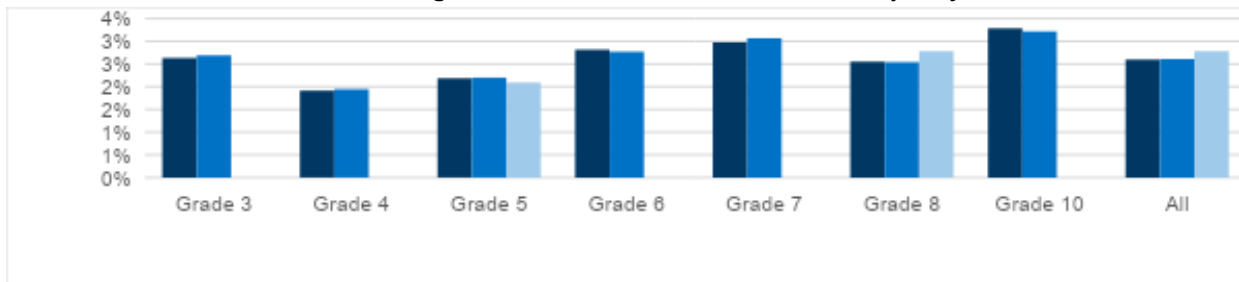
3c. Grade 8 and 10 ELA and Math SwD MCAS Participation Rates and Percent Tested with MCAS-Alt



MCAS-Alternate Participation and Outcomes

Under the federal Every Student Succeeds Act (ESSA), **state participation** of students on alternate assessments may not exceed one percent of the tested students on all assessments within each subject area. BPS participation rates significantly exceeded the state one percent cap in every grade for all assessment areas. Grade 4 posted the lowest rate (1.9 percent) for ELA and math while grade 10 posted the highest rates (3.3 percent for ELA and 3.2 percent for math). Grade 7 closely followed these rates (3.0 percent for ELA and 3.1 percent for math). Although there is no federal cap for school districts, states monitor district data and require school districts with rates above the state cap to submit plans for reducing their rates. The Council SST was advised that BPS rates have remained about the same because plans have not addressed the root cause for this participation rate.

Exhibit 3d. Percent of Students Taking the MCAS-Alt of All Tested Students by Subject Area and Grade

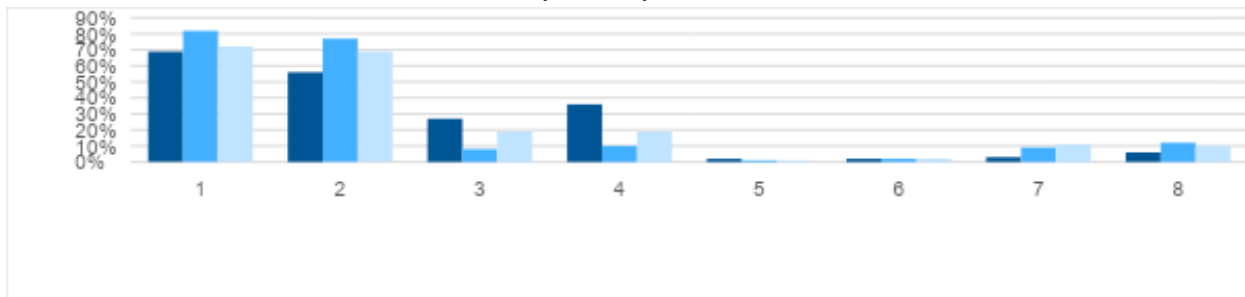


MCAS-Alt Outcomes

Students taking the MCAS-Alt are “Progressing” when their portfolio shows a partial understanding of a limited number of learning standards in the content area and addresses below grade-level expectations. These students appear to be receiving challenging instruction and are steadily learning new skills, concepts, and content. They require minimal prompting/assistance, and their performance is fundamentally accurate. Data in Exhibit 3d shows BPS students outperforming the state in the progressing category, with rates of 69 percent for ELA (13 percentage points above the state), 82 percent for math (5 percentage points above the state), and 72 percent for science (3 percentage points above the state). The

data needs to be reviewed in light of BPS’s higher than ESSA’s one percent MCAS-Alt participation rate and the increase in 10th grade of students taking the MCAS-Alt.

3d. MCAS Alt Certification Achievement Rates (2020-21)³²



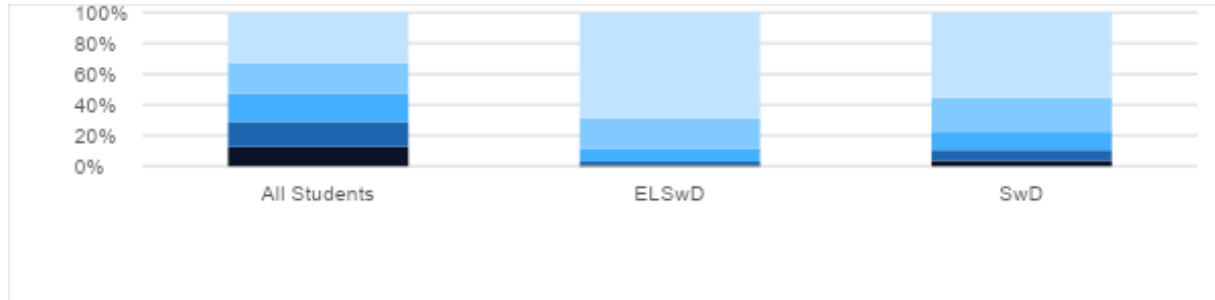
MAP Outcomes for All Students, ELSwD, and All SwDs

Although all schools are required to participate in the Measures of Academic Performance (MAP) formative assessment to better understand student progress throughout the district, student participation rates remain low and dependent on the school based autonomy. The MAP data helps to inform central office decisions for support to schools and teachers in areas such as instruction, professional development, data inquiry cycles to address student achievement, targeted allocation of staff, etc. As DESE reported, “without full participation on required assessments, the district lacks consistent information on the progress being made by all students in the district.” During the 2021-22 school year, BPS data showed that 19 schools did not participate.

Exhibit 3e shows percentages of all students, EL students with disabilities (ELSwD), and all students with disabilities (SwD) in five achievement categories: low, low average, average, high average, and high. For the “low” category, compared to 33 percent for all students, the ELSwD rate was 69 percent which was 14 percentage points higher than the SwD rate of 55 percent. Rates were closest for the low average category, with 20 percent for both all students and ELSwD and 22 percent for SwD. For average to high categories, rates were 47 percent for all students, 11 percent for ELSwD, and 23 percent for SwD. Information in Section 6 below addresses ways in which instructional approaches for ELSwD and SwD influence their learning and achievement.

³² Data as of 8/8/2022. Includes students who were actively enrolled in the district at the end of the respective school years in grades 11, 12, and SP. Includes students enrolled in Horace Mann Charters. Excludes students in Out of District placements. **Awareness.** Student demonstrates very little understanding of learning standards in the MA curriculum frameworks (as indicated in the alternate assessment portfolio.) Student requires extensive prompting/assistance, and performance is primarily inaccurate. **Emerging.** Student demonstrates a simple understanding of a limited number of learning standards in the content area at below-grade-level expectations (as indicated in the alternate assessment portfolio.) Student requires frequent prompting/assistance, and performance is limited/inconsistent.

Exhibit 3e. MAP Outcome Rates for All Students, ELs with Disabilities and All Students with Disabilities³³

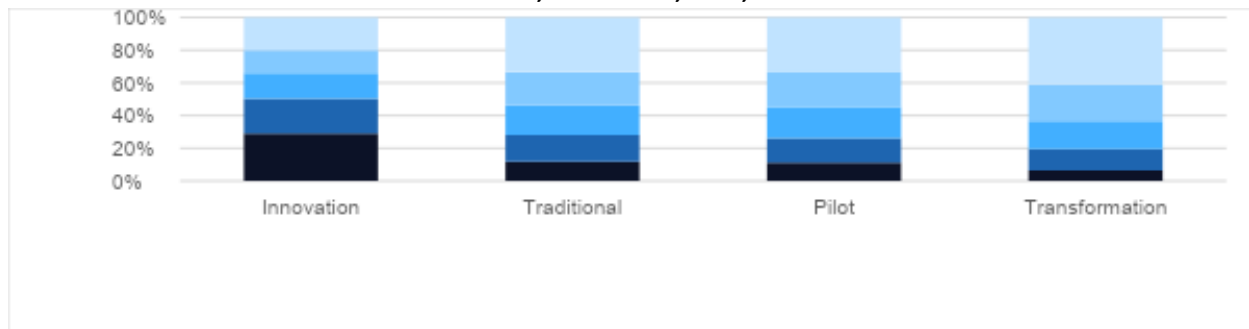


MAP Outcomes for Innovation, Traditional, Pilot, and Transformation Schools

Exhibit 3f shows MAP outcome rates for innovation, traditional, pilot, and transformation schools. For the “low” category, compared to the overall student rate of 33 percent, traditional and pilot schools had comparable rates (34 percent and 33 percent, respectively). Innovation schools’ rate was much lower (20 percent) and transformation schools much higher (41 percent). As discussed further in Section 7 below, the high concentration of students with IEPs in the transformation schools impact instruction and opportunities for inclusive education.

Compared to the overall student rate of 13 percent, again the traditional and pilot schools have similar rates of 12 percent and 11 percent, respectively. Innovation schools scored a higher 29 percent and transformation schools a low 6 percent.

Exhibit 3f. MAP Outcome Rates for Innovation, Traditional, Pilot, and Transformation Schools



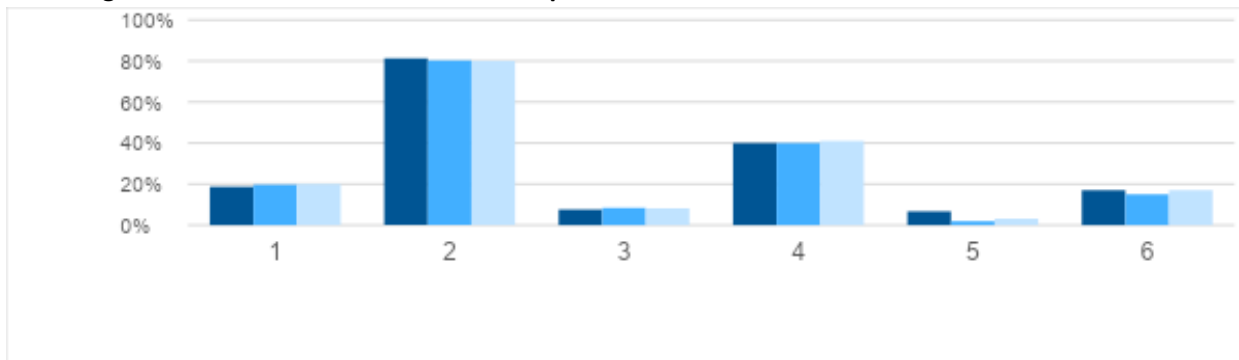
AP and Honors Completion Rates for Students With/Without Disabilities

Exhibit 3g shows the percent of 11th and 12th grade students with/without who completed AP and/or honors courses from 2019-20 through 2021-22. During this time, rates for students with disabilities increased slightly for completing AP courses (7.6 percent to 8.2 percent) and decreased for completing honors courses (6.7 percent to 3.1 percent). Rates for students without disabilities remained about the same: AP completion increased 1 percentage point (40

³³ Source: Mid-Year Winter MAP Achievement, SY21-22. Source: NWEA (MAP), Aspen (enrollment and demographics). Note: Data includes Irving, Timilty, Jackson-Mann, and Mission Hill schools, which closed at the end of SY21-22.

percent to 41 percent), and honors completion remained the same (17 percent with a 2020-21 rate of 15 percent).

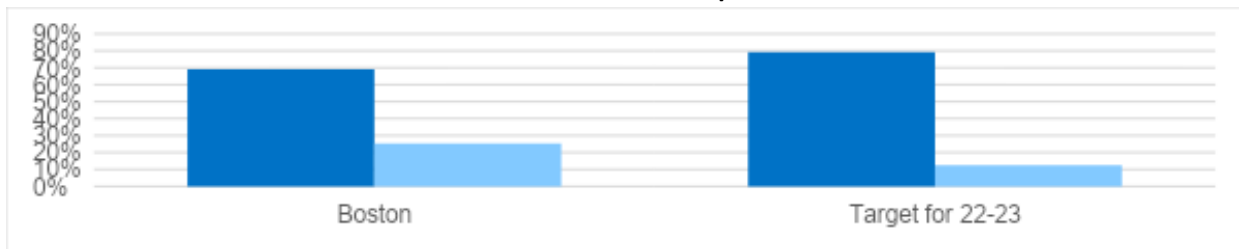
Exhibit 3g. 11th/12th Grade: AP and Honors Completion Rates for Students With/Without Disabilities³⁴



Graduation and Dropout Rates

For the 2021-22 school year, 69.0 percent of PBS students with disabilities graduated with a diploma, and the state target for the 2022-23 school year is 79.3 percent. For the dropout category, students with disabilities had a rate of 25.3 percent and the target for 2022-23 is 12.47 percent.

Exhibit 3h. 2021-22 Students with Disabilities Graduation/Dropout Rates³⁵



DESE’s report revealed that the 2020-2021 school year MassCore Completion Report showed 37.2 percent of BPS graduates completed MassCore, compared to 83.2 percent of high school graduates statewide. The report suggested BPS lacks clear instructional expectations and has uneven use of high-quality instructional materials across BPS’s high schools to inequitable access and opportunities. Over time, the district’s new MassCore policy and an effective implementation would improve outcomes, but this will take time.

DESE also reported that BPS’s lack of necessary systems and internal controls at the central office and school levels make it likely that the state’s reported BPS graduation and dropout

³⁴ BPS Data as of 8/8/2022. Includes students who were actively enrolled in the district at the end of the respective school years in grades 11, 12, and SP. Includes students enrolled in Horace Mann Charters. Excludes students in Out of District placements.

³⁵ Retrieved from https://profiles.doe.mass.edu/statereport/special_education.aspx.

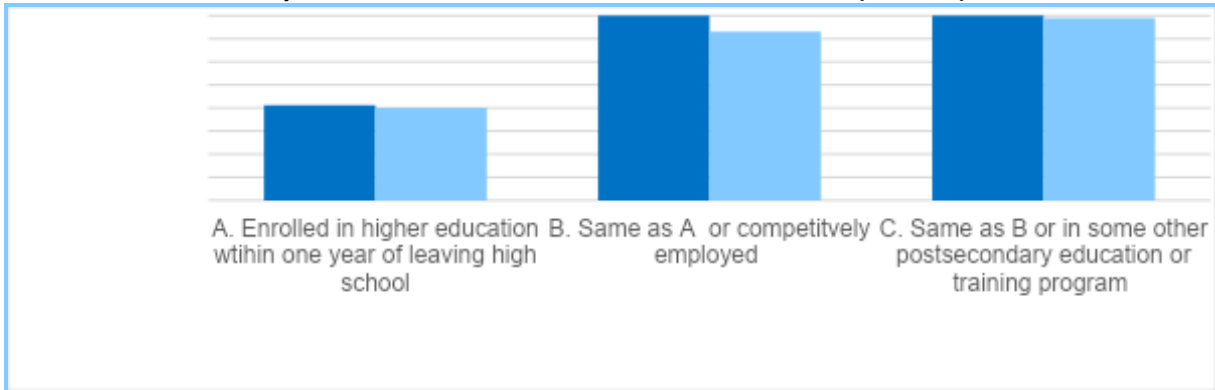
rates are inaccurate. DESE has questioned whether all schools have possessed appropriate documentation to withdraw an enrolled student. Although some improvements have been made in collecting documentation to justify the use of specific withdrawal codes, careful review of student information codes is warranted.

Postsecondary School Outcomes

Another area that the SPP measures is postsecondary outcomes for former students with disabilities one year after they left high school. This measure is to show former students' presence in three areas: (A) enrolled in higher education within one year of leaving high school, (A+) competitively employed, or (A+B+) engaged in some other postsecondary education or training program. Such data is important to show school districts how successful their former students are as they navigate the world of work and school after leaving high school and informs districts' educational programming and school transition activities.

Data used for Exhibit 3i shows SY 2020-21 cumulative percentages for BPS and associated state targets. In each category, BPS outcomes exceeded state targets. For the sum or all categories, the district's 87 percent exceeded the state target by 8 percentage points.

Exhibit 3i. Postsecondary Outcomes for Former Students with Disabilities (2020-21)



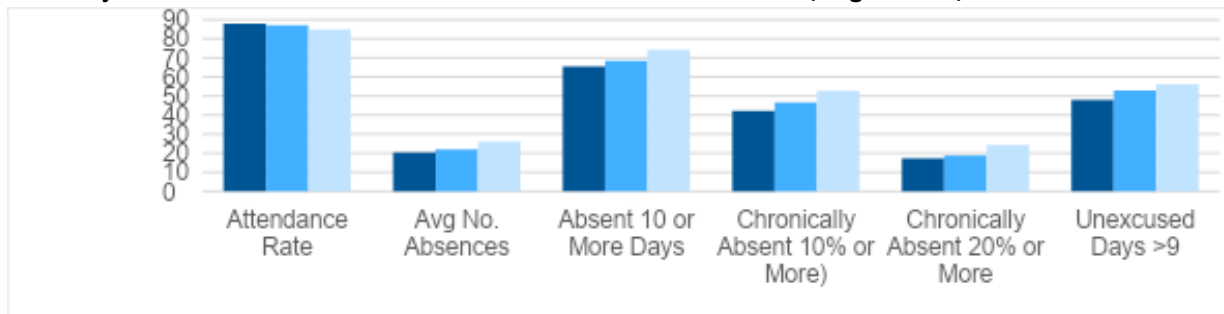
Attendance

Exhibit 3j shows attendance rates for all students, those with high needs,³⁶ and students with disabilities by various categories. Students with disabilities had the highest number of absences and highest rates in every area. The number of days absent were 20.4, 22.0 and 26.1 respectively. The following figures show disability rates and the number of percentage points higher than all students and students with high needs.

³⁶ High Needs are either low income (prior to 2015, and from 2022 to present), economically disadvantaged (from 2015 to 2021), EL/former EL, or a student with disabilities. A former EL student had been EL at some point in the four previous academic years. Definition retrieved from <https://profiles.doe.mass.edu/help/data.aspx?section=students>

- At Least 10 Absent Days. 74.2 percent disability (8.8 points more than all students and 5.8 points more than high needs)
- Chronically Absent >10% of School Days. 52.5 percent disability (10.3 points more than all students and 6.0 points more than high needs)³⁷
- Chronically Absent >20% of School Days. 24.3 percent disability (7.0 points more than all students and 5.5 points more than high needs)
- >9 Unexcused Days. 56.3 percent disability (8.2 points more than all students and 3.5 points more than high needs)

Exhibit 3j. Number of Absences and Attendance Rates for All Students, High Needs, and Disabilities³⁸



According to information provided by BPS, schools should have established intervention, outreach and engagement strategies using district tools, resources, and guidance to address chronic absenteeism. BPS’s [Tiered Attendance System](#) (TAS), which was developed by the Student Support Office’s Opportunity Youth, presents materials and links to resources and tools to support students with poor attendance. A review of TAS does not clearly identify resources for students who are absent for reasons related to their disability.

³⁷ Chronic absenteeism includes both excused and unexcused absences because all missed instructional time can have a detrimental impact on student outcomes. Retrieved from <https://docs.google.com/spreadsheets/d/1y62DNj2N45aTjB0MamtxqKp7-ezBWp8UD-8ZfsgpeOQ/edit#gid=1096703726>.

³⁸ Student Attendance 2021-22 (end of year), BPS School and District Profiles <https://profiles.doe.mass.edu/profiles/student.aspx?orgcode=00350000&orgtypecode=5&leftNavId=16817&>

Removal from School Due to Suspension

For the 2020-21 school year, BPS has a low suspension rate for students with disabilities with DESE reporting only 40 (0.3 percent) students with disabilities received an out-of-school suspension.³⁹ Data for this year was significantly impacted by COVID and remote learning. The rate for SY2021-22 was 5.9 percent.

Recommendation 3. Focused Conversations on SwD/ELSwD Achievement and KPIs

Have focused conversations at the central, regional, and school levels about the achievement of students with disabilities and ELSwD and develop key performance indicators with targets against which to annually measure growth.

a. Focused Conversations

Use current and newly developed sets of achievement and associated data (attendance, discipline) sorted by disability and strand programs, race/ethnicity, gender, and grade level to focus central, region, and school-based conversations. Use this information to identify areas of need. Begin these discussions with information available **by February 2023, and twice/year thereafter.**

- **Data Reports.** Review current BPS data reports and inventory the extent to which they include these data sets. Have representatives of the District MTSS Leadership Team identify additional data reporting needs, and how best to address student groups with data too small to report. Minimally, have data reports aligned with the KPI indicators addressed in Recommendation 3b below.
- **School Superintendent Data Checks.** Use these reports for data checks conducted by School Superintendents with their schools and individual principals. This process should inform the Quality School Improvement Plans. (Coordinate with Recommendation 2f.)

b. Key Performance Indicators

Expand current KPIs to include those measured by DESE's State Performance Plan (SPP) with identified targets and additional areas identified below.

- **SPP Indicators/Targets.** Use state-established targets for the current school year against which to measure BPS student growth. (For example, see Exhibit 3a, 3b, 3h and 3i, or DESE's website showing BPS outcomes for all SPP indicators and targets.)⁴⁰ Establish targets for of student group results that are masked by overall averages, e.g., ELSwD, different educational settings, gender, etc.
- **MAP Indicators.** Establish targets disaggregated by SwD subgroups. Also, establish targets for Innovation, Pilot, Traditional, and Transformation Schools, also by subgroups. (See, for example, Exhibit 3e and 3f.)

³⁹ <https://profiles.doe.mass.edu/ssdr/default.aspx?orgcode=00350000&orgtypecode=5&=00350000&>

⁴⁰ Retrieved from https://profiles.doe.mass.edu/statereport/special_education.aspx.

- AP and Honors Completion Rates

c. Issues Requiring Additional Attention

Consider the following for this purpose –

- **Students Taking the MCAS-Alt.** Take immediate action to address the disproportionately high number of MCAS-Alt test takers (from 2.2 percent for 5th grade ELA and math, to 3.3 percent for 10th grade ELA).⁴¹ (Exhibit 3c and 3d)
- **Root Causes.** Identify possible root causes, misunderstanding the criteria, or local decisions are influencing outcomes, including how state criteria for IEP team decision-making is being executed, etc.
- **BPS Operating Procedures.** Review state criteria and provide BPS operating procedures to ensure only students with the most significant cognitive disabilities are identified for MCAS-Alt participation. Use the results of the root causes to inform the operation of these procedures.
- **Graduation/Dropout.** Establish procedures for monitoring the use of appropriate documentation to support withdrawal of an enrolled student for accurate SwD graduate and dropout rate data.⁴²

Complete these activities for SY2023-24 and annually review the KPIs for any need to add indicators and/or changes in subgroups for disaggregation.

⁴¹ Students taking the MCAS-Alt do not receive instruction aligned with core curriculum and instead it is aligned with alternate achievement standards.

⁴² The DESE 2022 report indicated that BPS lacks necessary central office/school system controls for withdrawal documentation making it unlikely that graduation and dropout rates are accurate.

4. Disability Educational Environment Demographics

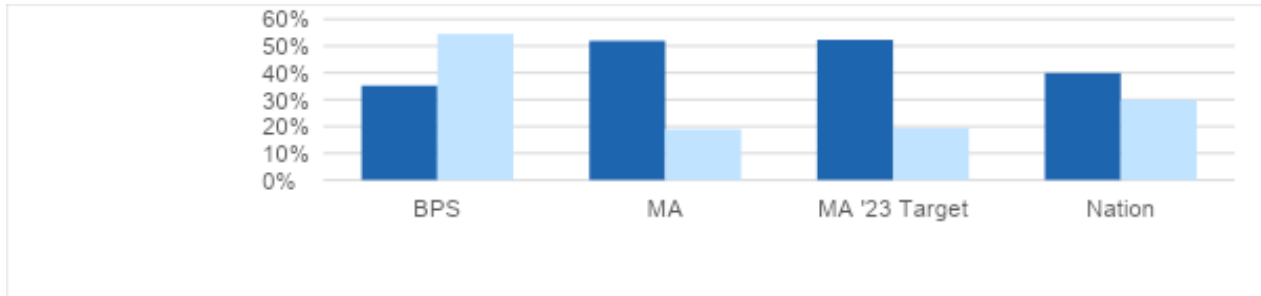
This section reviews the extent to which BPS students with disabilities are educated in various educational environments, using the federally required categories that the State Performance Plan (SPP) measures, with DESE established targets. These universal categories enable the Council SST to compare BPS data with national and state figures. This data lays a foundation for Section 5's description of BPS's configuration of categorical inclusion and substantially separate classrooms, which has been based on requirements that have unnecessarily limited less restrictive alternatives for IEP teams to consider, and Section 6's analysis of how these factors, along with others, have led to the education of a high proportion of students with disabilities in a small number of schools.

Using the categories that the SPP measures, BPS data is compared to MA and national data (when available), and is analyzed by age, grade, disability, race/ethnicity, EL status, gender, and economic disadvantage status.

Children 3 to 5 Years of Age

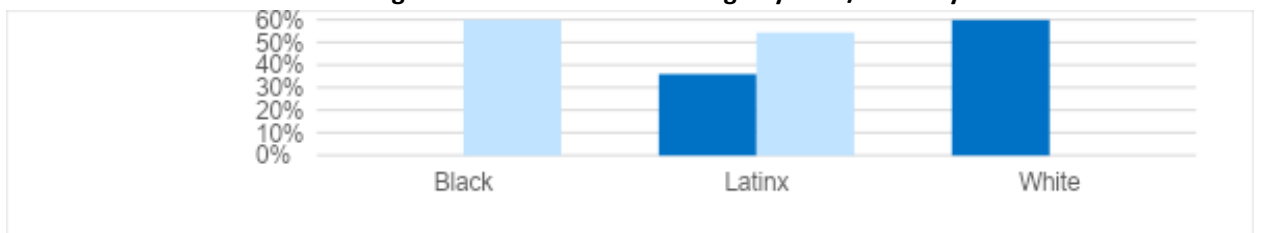
Based on 2021 SPP data, BPS educates 35.2 percent of its young children in regular early childhood (EC) classrooms for the majority of the day compared to 52 percent of MA children (with a 52.3 percent 2022-23 target). BPS's rate also is below the national average of 40 percent. For children educated in substantially separate classrooms, BPS's 54.5 percent rate is much higher than MA's 19 percent (with a 19 percent 2020-23 target) and the nation's 30 percent rate. Although BPS sponsors universal pre-K for 4-year-olds, this opportunity is not available for 3-year old children without IEPs. This factor limits opportunities for inclusive instruction for this young group who would benefit from interaction with their nondisabled peers. BPS is providing speech/language services to children in Headstart and would like to increase this service to children who attend community programs.

Exhibit 4a. BPS, State and National Educational Environment Rates for Children 3-5 Years of Age⁴³



Disaggregating this data by race/ethnicity shows white students are far more likely to be educated inclusively (64 percent) than Latinx students (36 percent). BPS’s suppressed figures for black children educated inclusively and white students educated in substantially separate classrooms because each group numbered less than 10. (See Exhibit 4b.)

Exhibit 4b. BPS Educational Settings for Children 3-5 Years of Age By Race/Ethnicity⁴⁴



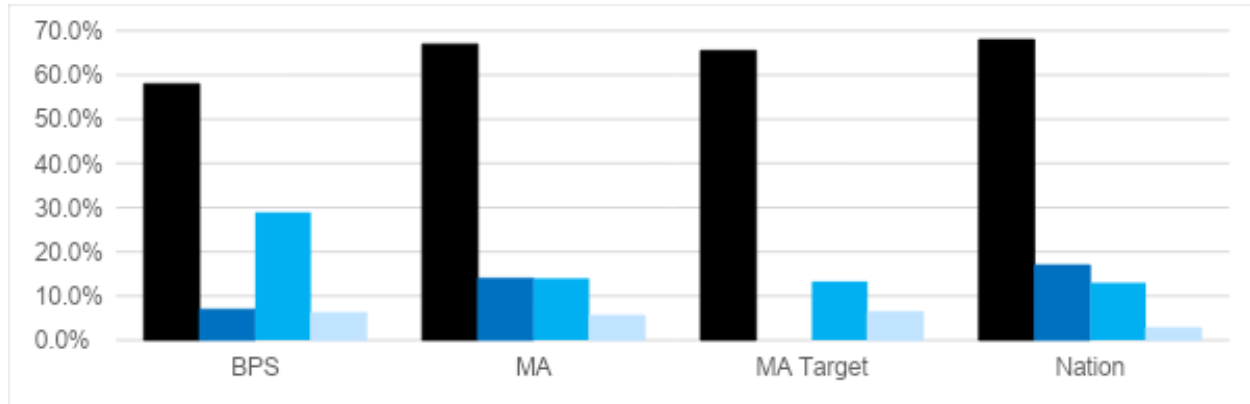
Students 6-21 Years of Age

Overall, 58 percent of BPS students 6 through 21 years of age are educated inclusively, compared to the state’s 67 percent and the nation’s similar 68 percent. MA’s 2022-23 SPP target is 65.5 percent.

⁴³ Retrieved from https://profiles.doe.mass.edu/statereport/special_education.aspx, state and national data retrieved from National Part B Child Count and Educational Environments 3 through 5, retrieved from <https://data.ed.gov/dataset/idea-section-618-data-products-static-tables-part-b-count-environ-tables12/resources>, State targets retrieved from https://profiles.doe.mass.edu/statereport/special_education.aspx,

⁴⁴ Source: Enrollment as reported to MA DESE, October 2021. Includes students in out of district placements and excludes students enrolled in Horace Mann Charter Schools. Data is suppressed for groups of < 10 students and in cases of complementary suppression to protect identifiable student information. This source applies to data in this section.

Exhibit 4b. BPS, State and National Educational Environment Rates for Students 6-21 Years of Age



Adding partial inclusion, BPS’s rate is 65 percent, compared to the state’s 81 percent, and the nation’s 85 percent. The district rate increased from 63.9 percent in 2020-21. The MOU 2022 target for full and partial inclusion is 65.9 percent.

According to information provided by BPS representatives, the district has limited opportunities for partial inclusion. When students are partially included for core subject areas it is usually done on a “trial” basis. When there is sufficient formal and informal data and other information collected, an IEP team meeting is held to consider a change in placement. In addition,

While there are some solid exemplars of buildings that make partial inclusion work for our students, this is poorly accounted for and documented in the IEP due to limitations related to our current placement system and its alignment to rigid “minutes” structures. In addition, there is no formal structure that supports a student to be pulled out for some instructional activities and included to the maximum extent.

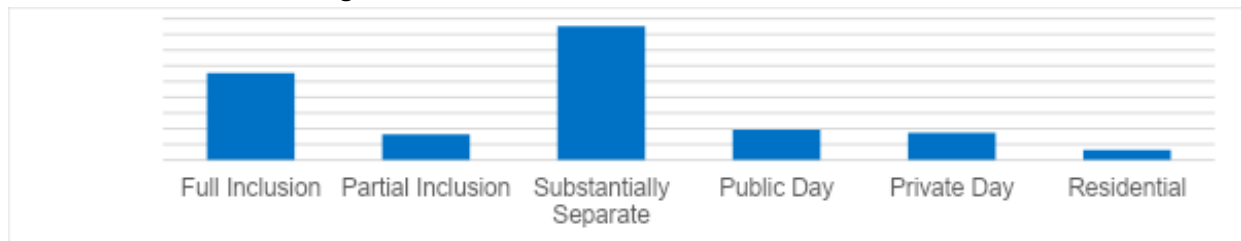
Finally, BPS’s substantially separate placement rate (29%) is more than double the state (14%), the state target (13.3%), and the national (13%) rates.

Educational Settings for Students 18 Years of Age and Older

While not a separate category measured by the SPP, disaggregating data for BPS’s 830 students 18 years of age and older is useful to understanding their educational environments. Exhibit 4c shows that 28 percent of these students are educated inclusively (36 percent with partial inclusion) and most (68 percent) are educated separately: in substantially separate classrooms (43 percent), separate schools (10 percent public and 9 percent private), and residentially (3 percent). Previous Council SST reviews involved school districts that have educated older students in community-based settings such as junior colleges or storefront businesses to promote greater opportunities for future education and employment after leaving high school. Although the SST had limited time to interview and learn about BPS’s Supporting Transitions

to Reach Independence through Vocational Experiences (STRIVE) program, its website did not highlight any of the specific community-based educational or work settings that exist.⁴⁵

Exhibit 4c. Educational Setting Rates for Students 18 Years and Older



Environments By Grade

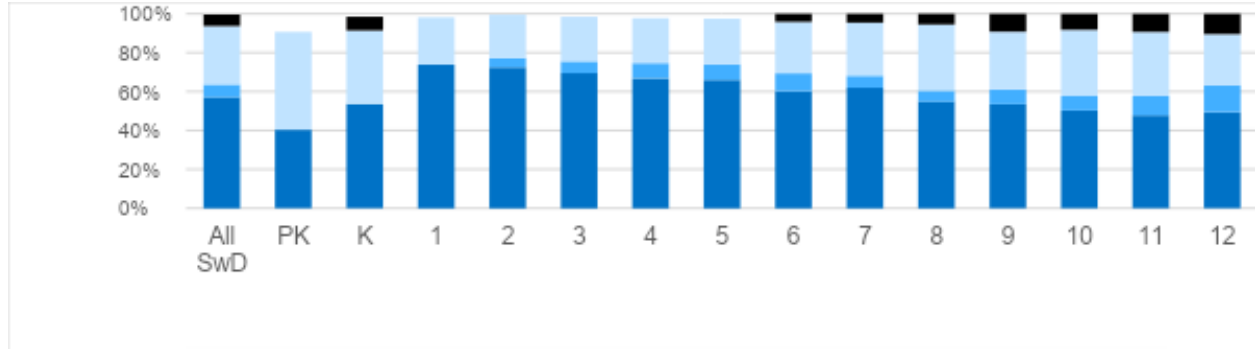
Exhibit 4d shows the proportion of educational environments by grade.

- **Full Inclusion.** Elementary level rates were lowest PK and K (40 percent and 54 percent, respectively). Information was not presented during interviews to understand the basis for these low rates. The rate jumped in 1st grade to 74 percent, which requires significant adjustments for young children who were previously educated separately from their nondisabled peers. This rate remained steady until 3rd grade, when it fell to 69 percent and continues to fall through 12th grade (49 percent).
- **Partial Inclusion.** Across all grades, partial inclusion rates are low, ranging from 5 percent (2nd grade) to a high of 9 percent (6th grade).
- **Substantially Separate.** Rates fall from early grade highs of 50 and 38 percent (PK and K, respectively) to rates ranging from 22 percent (2nd grade) to 27 percent (7th grade). The rate increases to 34 percent (8th grade), and in high school range between 34 percent (10th grade) and 26 percent (12th grade).
- **Separate Schools.** Elementary/middle grades had the lowest separate school rates, ranging from 4 percent (6th grade) to 7 percent (K). High school rates were higher, ranging from 8 percent (10th grade) to 10 percent (12th grade). Grades showing no data had numbers under 10, which BPS suppressed. These figures would have been helpful for a complete grade representation.

⁴⁵ Retrieved from

<https://www.bostonpublicschools.org/Page/8825#:~:text=The%20mission%20of%20the%20STRIVE%20Department%20is%20to,vocational%20training%2C%20community%20engagement%2C%20and%20post-secondary%20adult%20services.>

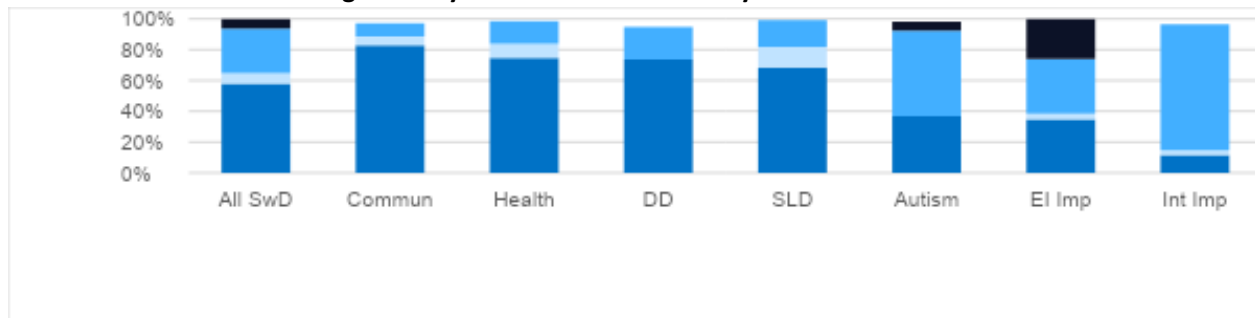
Exhibit 4d. Educational Setting Rates by Grade



Environments by Most Common Disability Areas

Exhibit 4e shows the proportion of educational environments by the most common disability areas. Data that compares BPS rates to MA and national rates are discussed below and shown in Exhibits 4f-4i.

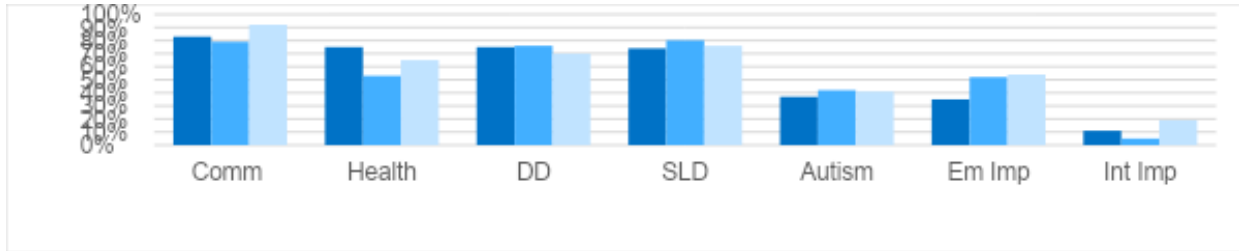
Exhibit 4e. Educational Setting Rates by Most Common Disability Areas



Full Inclusion

- BPS Higher than MA and/or Nation.** Health impairment rates, which typically comprises students with an attention deficit hyperactivity disorder (ADHD) in major part, were higher than MA and the nation. Also, communication rates were higher than MA, but smaller than the nation. Intellectual impairment rates were larger than MA’s but smaller than the nation’s. Developmental disability (DD) rates were about the same for BPS, MA, and the nation.
- BPS Lower than Either MA or Nation.** SLD, autism, and emotional impairments all had smaller BPS rates than MA and the nation. In particular, BPS’s SLD 74 percent was below MA’s 80 percent, and the district’s emotional impairment 35 percent was far below MA’s 52 percent and nation’s 54 percent.

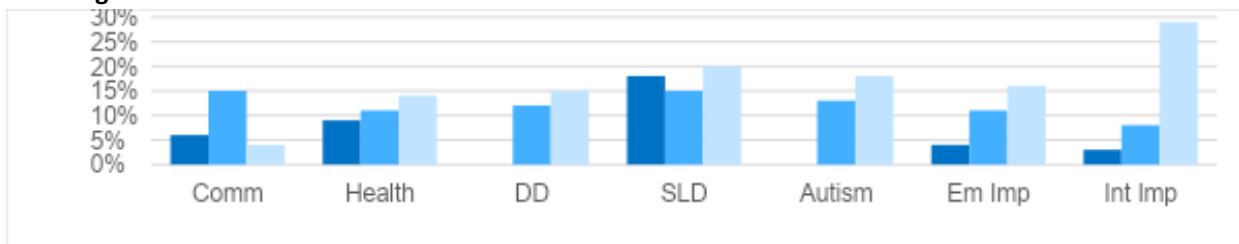
Exhibit 4f. Full Inclusion



Partial Inclusion

In all areas, BPS rates were much lower than MA and national rates except for SLD where the BPS rate was higher than MA’s rate.

Exhibit 4g. Partial Inclusion

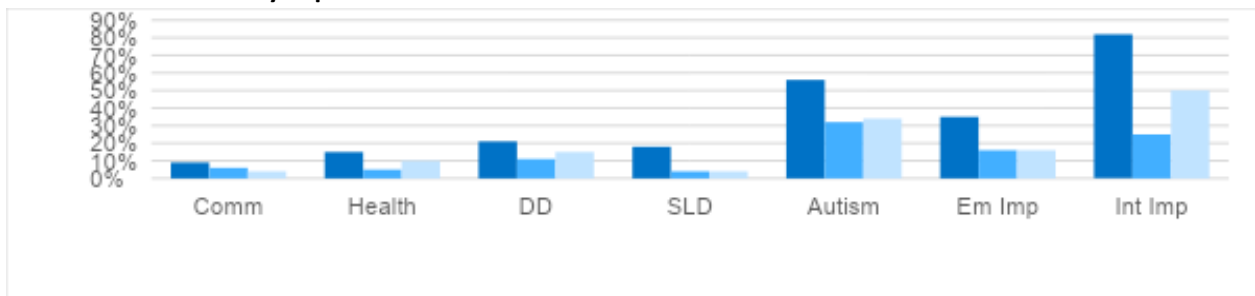


Substantially Separate

BPS rates were higher in every area than MA and the nation, and in several areas the difference was significant. The following shows BPS’s rates and the number of percentage points above MA and the nation for areas with rates exceeding a 10-percentage point gap.

- **Intellectual Impairment.** BPS’s 82 percent was 57 points >MA and 32 points >nation
- **Autism.** BPS’s 56 percent was 24 points >MA and 22 points >nation
- **Emotional Impairment.** BPS’s 35 percent was 19 points above MA and the nation
- **SLD.** BPS’s 14 percent was 14 points above MA and the nation

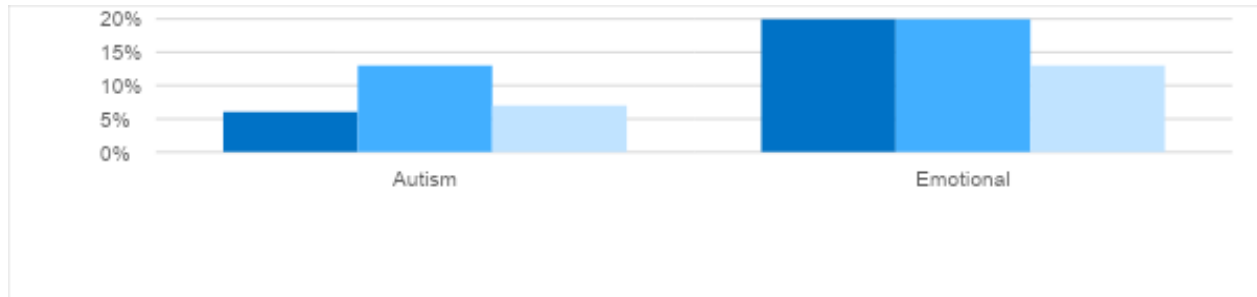
Exhibit 4h. Substantially Separate



Separate School

Autism and emotional impairments were the only two areas with cells numbering more than 10 for students educated in separate schools. BPS's 6 percent autism rate was smaller than rates for MA (7 percentage points) and the nation (1 point). The district's 26 percent emotional impairment rate was higher than MA (by 5 points) and the nation (by 13 points).

Exhibit 4i. Separate School Rates by Autism and Emotional Impairment



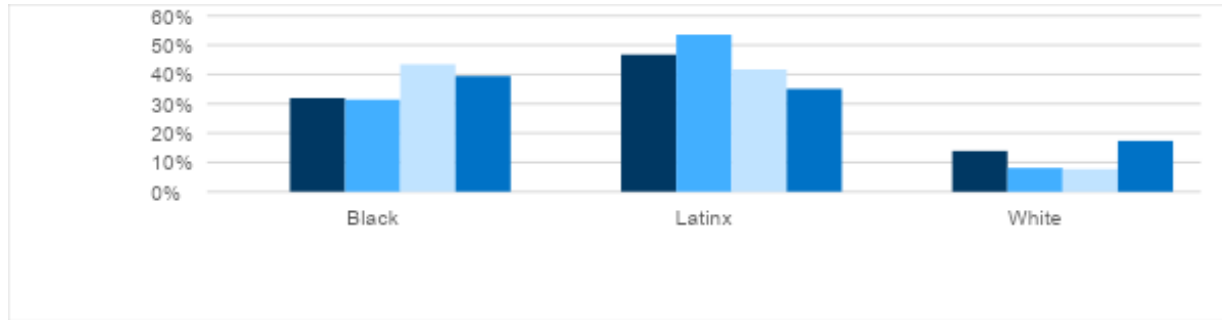
Comparison of Disability Rates by Race/Ethnicity to Overall Rates by Educational Environment

Exhibit 4j shows disability rates compared to the composition of each educational environment for black, Latinx and white students. For perfect proportionality, each group's disability rate would be the same for each environment. Significant findings were that black students, with a 35 percent disability rate, had a 43 percent rate for substantially separate classrooms and a 39 percent rate for separate schools. White students, with a 12 percent disability rate, had a 17 percent rate for separate schools. Exhibit 4j showed the following –

- **Black.** With a 35 percent disability rate, black students had higher rates for substantially separate classrooms (by 8 percentage points) and separate schools (by 4 points). Their rates were lower by a few points for full inclusion (3) and partial inclusion (4). Furthermore, in 2021-22 BPS black males were 3.63 times more likely than other groups to be educated in an emotional impairment substantially separate classroom.⁴⁶
- **Latinx.** With a 45 percent disability rate, Latinx students had higher rates for partial inclusion (by 10 percentage points), and full inclusion (by 2 points). Their rates were lower by a few points for substantially separate (3) and separate schools (10).
- **White.** With a 12 percent disability rate, rates for white students were higher by 2 points for full inclusion and 5 points for separate schools. Their rates were lower for partial inclusion and substantially separate by 4 points.
- Currently, 31 percent (2,376) black and Latinx students comprise the 7,755 students educated in substantially separate classrooms. The MOU set a 2022 target for the percentage of students of color placed in substantially separate programs at 29.5% or lower.

⁴⁶ State and National Trends in Special Education, OSE School Committee Slides

Exhibit 4j. By Educational Environment, All SwD and Racial/Ethnic Group Rates



The extent to which ELs are educated in the above settings is addressed in the section below.

Recommendation 4. BPS Educational Settings Using Federal Reporting Categories

Use KPIs aligned with federal reporting categories and state targets to assess BPS growth in meeting the targets and add subsets of KPIs to identify/address outlier data requiring attention. Also, establish/increase natural environments for students remaining in school after the age of 18 years for secondary transition services.

a. Key Performance Indicators

Expand current KPIs to include those measured by DESE’s State Performance Plan for children 3-5 years of age and students 6-21 years of age, with state established targets for each current school year. (See Exhibits 4a and 4c for federal indicators and state 2022-23 targets.) Note: the May 2021 BPS/DESE MOU established a 2022 minimum target of 65.9 percent for students educated in partial and full inclusion placements. (DESE 2022 Report)

- **Disaggregate Data.** Incorporate the areas of disaggregated SwD groups described under Recommendation 3 by using representatives of the District MTSS Leadership team to establish BPS placement targets for these groups. (See examples of disaggregated group data at Exhibits 4b, 4e-4k, and 6a-6g.) For example, the 2022 BPS/DESE MOU set a maximum target of 29.5 percent for students of color educated in substantially separate placements. (DESE 2020 Report) To support progress to meet/exceed this target, the larger students of color group needs to be disaggregated further by each racial/ethnic student groups it constitutes.
- **Comparisons with State/Nation and Districts Having Similar Demographics.** Using SPP publicly reported district data, show national/state rates, and data for districts with similar all student rates for race/ethnicity, and EL and economic disadvantage status. (Coordinate with Recommendation 3e.)

b. Natural Environments for Educating Students Remaining in School for Secondary Transition

For students 18-21 years of age who remain in school to receive transition services Initiate/expand instruction outside of the high school setting, such as postsecondary settings,

community colleges, or other community settings. (Although dated, see “Transition Services for Students Aged 18-21 with Intellectual Disabilities in College and Community Settings: Models and Implications of Success.”⁴⁷ (See Exhibit 4d)

Time Frame: By the beginning of SY2023-24

(See Recommendation 6 for increasing the effective use of partial inclusion.)

⁴⁷ the National Center on Secondary Education and Transition, Institute on Community Integration (December 2006), retrieved from <http://www.ncset.org/publications/viewdesc.asp?id=3395#:~:text=Providing%20transition%20services%20and%20suports%20in%20college%20and,2000%3B%20Hart%2C%20Mele-McCarthy%2C%20Pasternack%2C%20Zimbrich%2C%20%26%20Parker%2C%202004%29>.

5. English Learners with Disabilities

As this section describes, a larger percentage of SwDs are English learners⁴⁸ compared to the composition of ELs with IEPs, and variances for various disability areas are disproportionately high for ELs. ELSwD achievement rates lag behind all other groups and compared to non-ELs they are educated with nondisabled peers at lower rates and in substantially separate classroom at higher rates. Schools are increasingly relying on double and triple certified teachers to meet all ELSwD needs and stretch their budgets. Furthermore, BPS is emerging from a 20-year absence of significant growth in bilingual education and a teacher workforce that has not been intentionally filled with multilingual/ multicultural individuals, especially in the area of special education. These challenges are exacerbated by BPS's special education configuration of instruction, within which ELSwD are educated, that must also be addressed.

Leadership for ELSwD

In this context, the two offices, OSE and OMME, with missions critical to executing necessary changes have both had leadership turnover and no visible united front. Although joint meetings have begun, there is a legacy of separateness that has viewed the education of ELSwD as a bifurcated endeavor. For example, there are separate documents for procedure/practice guidance and two draft strategic plans that are not aligned for ELSwD. Furthermore, there have been issues that were not addressed expeditiously because they lay in both OSE and OMME, and it is perceived as though neither took mutual or individual responsibility supporting students.

This separate mindset was further exemplified when the Council SST asked BPS to describe current collaborative activities between EL and special education departments. The response referred only to the two ELSwD supervisors in OSE (with positions that have been vacant for one year) and their responsibilities to –

- Conduct regular reviews for instructional program needs and support access to equitable (bi)literacy across settings and programs
- Monitor implementation of policies and procedures for MLSWD
- Convene stakeholders
- Oversee PD and instructional planning and implementation of appropriate instruction - with a special education and ESL lens, as well as MA frameworks, WIDA, etc.
- Oversee data analysis and data teams
- Liaise between OSE and OMME

Circular for BPS Instructional System and Monitoring for Multilingual Learners

⁴⁸ Although BPS has adopted the term multilingual learner (ML), the Council SST uses the term English learner to be consistent with other Council district terminology.

The Superintendent's August 2022 Circular referred to research showing that the use of native language instruction and resources has a positive effect on English language development. The Circular acknowledged that when teachers have a basic knowledge of students' native language structure, they can better identify students' positive and negative linguistic transfers.

Given the lack of native language instruction currently available in BPS schools, the Curricular fell short of requiring this approach. Instead, teachers "should" leverage students' native-language literacy skills "whenever possible" and use that knowledge to facilitate metalinguistic awareness and cross-linguistic transfer. Teachers also "should" consider using native language materials to build background knowledge and help students transfer content-area skills and understandings from one language to another. Interviewees cited the trauma English learners experience when, because of language constraints, they are unable to understand instruction and conversation. Interviewees shared that sometimes students are bullied for their lack of English proficiency. Support offered to parents may not be useful because of the same constraints.

According to a BPS representative, the district cannot "legally" require this approach unless the target language and teacher are Dual Language, TBE SLIFE bilingual programs, or a bilingual position in which the educator was hired into.

OMME Strategic Plan

The Boston/DESE Systemic Improvement Plan specifies the use of high-quality grade level content instruction to all English learners, particularly ELSwD, including rigorous, age-appropriate curricula, enrichment programs, and access to advanced coursework and dual language programs. BPS' Office of Multilingual and Multicultural Education (OMME) strategic plan outlines steps to expand access to native language instruction and literacy. OMME's plan has five priorities. The second priority is, "Ensure that all Multilingual Learners with Disabilities (MLWD) receive appropriate services and support including native language." OMME's plan expresses a strong commitment to expand bilingual programs that support students and enable their achievement of the Massachusetts State Seal of Biliteracy. Two metrics specify 2022-23-year end and beyond time frames for hiring additional bilingual paraprofessionals and/or bilingual educators and for appropriate special education and language support.

- 1. New Hires.** Interviewees expressed concern with the first metric, which calls for a 15 percent growth of bilingual paraprofessionals and/or bilingual educators to support multilinguals with disabilities (MLWDs) with level 1-3 English language proficiency (ELP).⁴⁹ With the enormous need for these students to receive native language instruction, this rate is viewed as too low and known strategies and resources are available to increase this outcome. For example, with intentional/targeted recruitment, OSE's related service goal to

⁴⁹ BPS's representatives informed the Council SST that this metric has been updated to support MLWDs with level 1-5 ELP.

hire bilingual SLPs has led to the hiring of 24 speech/language pathologists who speak Spanish – 6 speak five other languages. Last year the group successfully piloted the hiring of contractual bilingual SLP assistants, which the group has been trying to bring in-house. Other interviewees stated they had found bilingual applicants, including those going through a Pathway program, but they went to other districts because of BPS' lengthy hiring and onboarding process. Psychologists have been able to increase their recruitment of bilingual personnel by providing better tools, such as iPads, and bilingual materials.

Section 2.6 of the strategic plan focuses on the highest concentrations of MLWD by language with hiring bilingual paraprofessionals and teachers for inclusion/substantially separate classrooms (2.6.e) and bilingual related service providers to support special education programs/schools (2.6.f). Although there is a step to assess the program and school sites with need (2.6.c) there are no provisions for identifying the number of personnel needed by role, improved recruitment activities, or expectations for expediting the onboarding of applicants. Furthermore, another provision (2.3.c) would increase the number of bilingual assessors and availability of assessments in most languages, without reference to determining the number needed. This information should drive this metric to identify an increase that is demanding and reachable with a high level of effort. It is not clear if step 2.1.j, "Identify highest concentration of MLWD by language/classroom to assess baseline of bilingual support and target matching of paras and teachers by language (annually)," is intended to monitor current or needed resources.

- 2. Instruction/Services.** The second metric calls for 100 percent of MLWD to receive appropriate special education and language services regardless of program and/or placement. BPS should regularly measure and report on progress related to this metric.

English Learner Identification

The information below was discussed above and is repeated to focus on disability identification rates for ELs in comparison with several other student groups (see Exhibits 5a through 5c).

Of all ELs, 24 percent have IEPs, but they comprise 34 percent of all SwDs. Their composition of several disability areas is much higher: multiple impairment (55 percent), hearing impairment (47 percent), communication impairment (46 percent), intellectual impairment (40 percent), and DD (39 percent). Their composition is lowest for the emotional impairment (17 percent) category. (See Exhibit 5a.).

Exhibit 5a. EL Rates for All BPS, All BPS EL, All Disability, and Disability Areas.

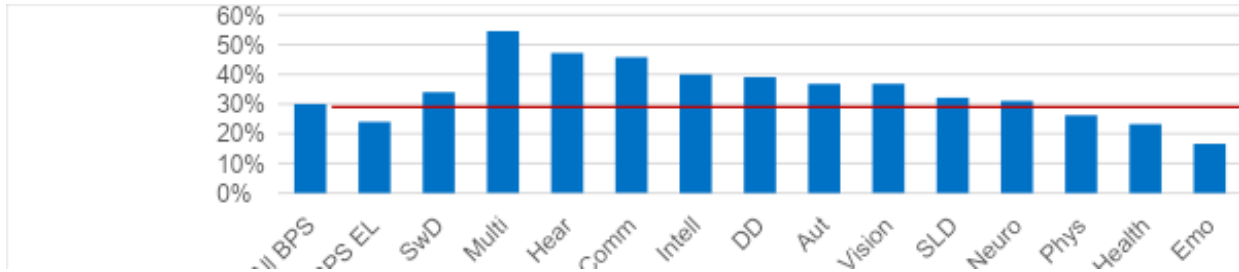


Exhibit 5b. ELSwD and Not ELSwD Disability Rates

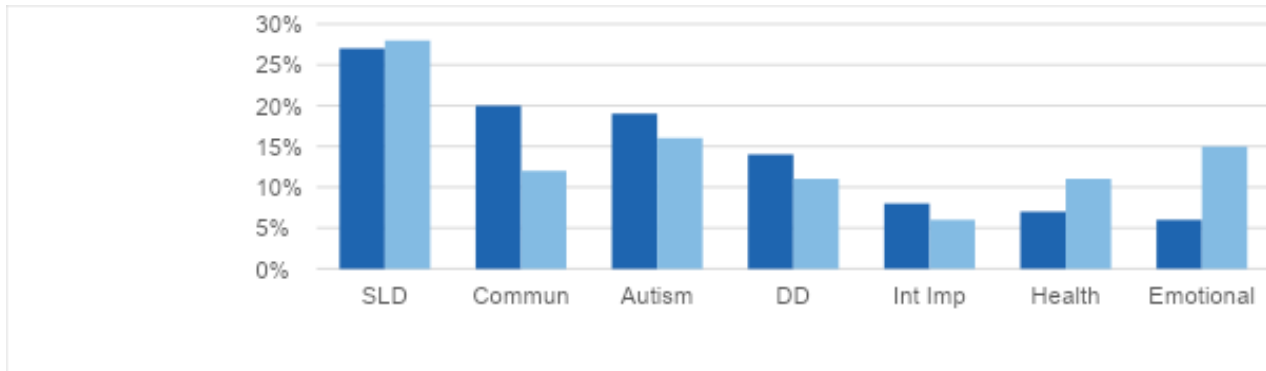
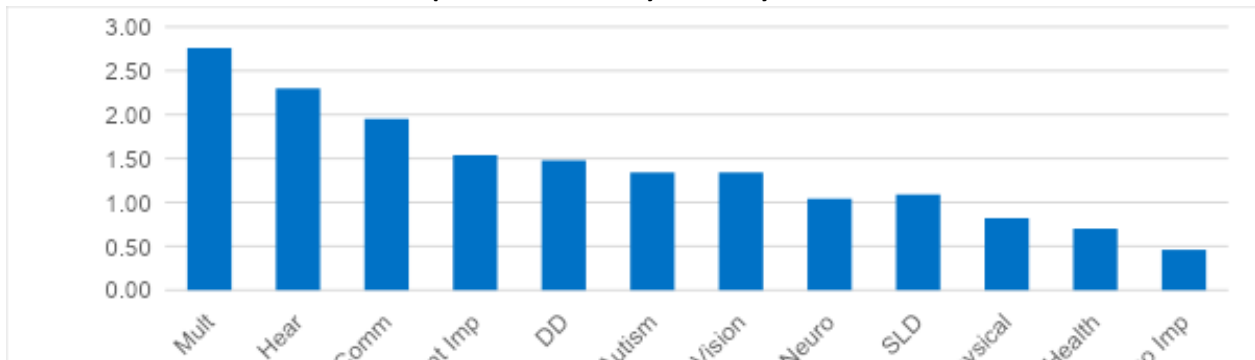


Exhibit 5c. Risk Ratios for All ELs Compared to Not ELs by Disability



Concerns were expressed that BPS has rarely recognized the magnitude of these figures. Recently, the ELL Task Force has begun to gather and report data for this student population to focus attention on the issue, begin to study root causes, and formulate recommendations.

In particular, the communication impairment disparity raises the question of whether EL students are being identified as needing speech/language services because of a disability or a reason related to language acquisition. Some interviewees explained that these high rates may be a result of speech/language pathologist (SPLs) constraints in providing diagnostic assessments in students' first language, limiting their ability to assess learners with low English language acquisition in their native language.

Eligibility decisions for intellectual impairment and DD could also be influenced by assessors who do not speak students' native language and access to language appropriate and sensitive assessment tools. Multiple disabilities are not typically an issue of misidentification but could raise issues involving access to good health care. The high presence of hearing impairments also raises issues related to health care and perhaps assessment processes. Interviewees also raised the following issues –

- **Students who are Nonverbal or Apparent Severe Intellectual Impairment.** Reportedly WIDA, World- Class Instructional Design and Assessment, does not help to assess these students' language proficiency, yet they still must be tested. This factor also influences special education eligibility and language acquisition needs.
- **Knowledgeable Persons at IEP Meetings.** Although persons with knowledge of ESL instruction and language acquisition are required to participate in IEP team meetings for English learners, BPS does not have a system for monitoring this occurrence. Eligibility determinations may not be valid without the involvement and feedback of persons who understand levels of English proficiency and their influence on assessment results.

The OMME draft strategic plan addresses these issues primarily in action area 2.3, which addresses disproportionality/appropriate identification of MLs for special education, including root cause analysis (2.3.a), data desegregation and analysis (2.1.c), diagnostic/progress assessments and performance/compliance data (2.1.b), procurement for native language assessments (2.3.b), and spoken dialect interpretation (vs. academic language) for assessments as needed (2.3.e).

Section 2 of this report previously addressed the benefits of a comprehensive MTSS framework and implementation, and the current lack of a comprehensive systemic approach to providing general education tiered interventions and supports, along with effective data collection, problem-solving, and progress monitoring. OMME's action area addressing disproportionate/appropriate special education identification (2.3) addresses the development of MTSS. However, these issues are exacerbated when first instruction is not provided in a student's native language and may also lead to false determinations that students need special education to learn.

OMME addresses MTSS in its third action area, which concerns the improvement of instruction and outcomes across multilingual learner programming. Step 3.1 refers to the creation of data driven Equitable MTSS systems of support (including SEL/trauma support) to support all ML students targeting special population students' needs (MLWD; SLIFE; Newcomers; Over-age) towards graduation or pipelines to adult education, bilingual certificate programs, vocational education programs, and/or colleges. The independent creation of an MTSS framework for one group of students does not meet the spirit or intent of MTSS and contradicts established literature for the framework to be sufficiently broad to embrace all students.

The OMME strategic plan also addresses the review of procedures for newcomer MLs and appropriate special education referrals (2.3.e). Some interviewees expressed concern that some students with limited and/or interrupted formal education (SLIFE) are identified as needing special education when their educational circumstances are the cause of their low achievement.

OSE Strategic Plan

The Council SST learned that OSE may be developing a Strategic Plan, and our recommendations for the plan are addressed later in Section 8 – School-based Administration and Operation of Special Education. We recommend creating an OSE strategic plan that includes clarifying the vision and expectations for working across departments and schools to ensure special education services and supports are being provided to the diverse students, families, and community that OSE and BPS serves. There should be specific details about culturally and linguistically diverse students and the role of OSE in addressing equity and accountability for this student population. The plan should capitalize on research that supports a unified system of service delivery based on the premise that all students (such as those typically developing, with disabilities, learning English, ELSwD, from culturally diverse backgrounds and different economic statuses) are accepted and valued for their unique abilities and included as integral members of each school.

The action steps outlined should articulate the staffing, EL supports, instructional materials, placement etc., for ELSwD. The OSE work plan should align to the OMME plan and articulate how OSE, OMME, and other depts work together to accomplish the goals for ELSwD. There are significant concerns shared by those interviewed, and it is reinforced by the data reviewed on ELSwDs, that the OSE department is not owning their responsibilities for ELSwD. This perception must be immediately addressed in multiple ways within OSE incorporated into written documentation of goals and objectives. This also includes hiring staff that is bilingual and bicultural that work within OSE.

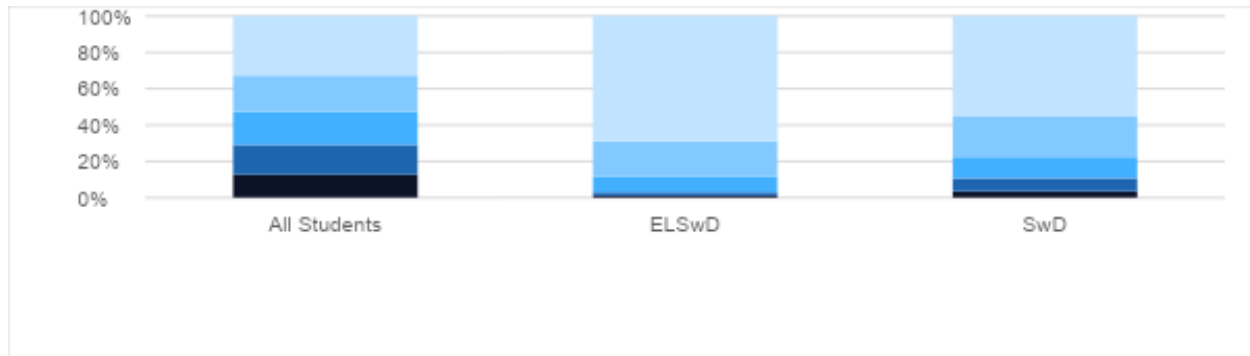
Data from 2021-22 shows 37 percent of ELSwD were educated in substantially separate classrooms compared to 30 percent of non-EL students, and 56 percent were educated with full inclusion compared to 64 percent of non-EL students. Furthermore, young ELSwD were 2.52 times more likely than non-EL peers to be educated in early childhood substantially separate classrooms. Their risk ratio was high also for multiple disability (2.19) and approaching twice as many (1.77) for moderate intellectual impairment. (For more information see Exhibits 4l and 5d). It was reported to the Council SST that ELSwD in substantially separate programs were not consistently provided native language support or instruction from an ESL certificated teacher. As previously discussed, the Hehir Associates report highlighted the relationship between SwD's learning most of the time in general education classes with higher achievement than those educated separately from their nondisabled peers.

MAP Outcomes for All Students, ELSwD, and All SwD

According to information provided by the ELSwD Task Force representative, in 2021 for grades 3-8 only 3.5% of ELSwD met or exceeded expectations in ELA and 6.7% met this standard in math, meaning more than 90 percent of the students failed to meet academic standards. MAP

results for SwD are a little better. For average to high categories, the ELSwD rate was 11 percent, but 12 points lower than the SwD rate, and 36 points lower than the “all student” rate. For the “low” category, ELSwD had a 69 percent rate, which was 14 percentage points higher than the SwD rate, and 22 points higher than the “all student” rate. (See Exhibit 5d.)

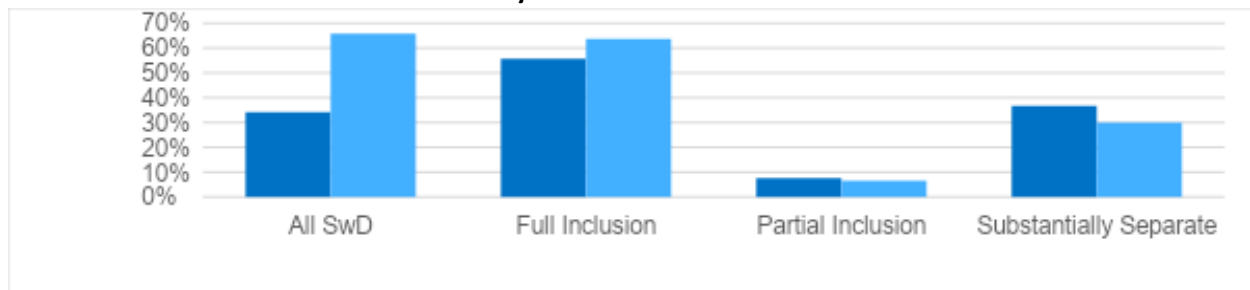
Exhibit 5d. MAP Outcome Rates for All Students, ELs with Disabilities and All Students with Disabilities⁵⁰



Educational Environments of Current EL and Not EL Students

Exhibit 5e shows data comparing overall rates for current EL and non-EL students compared to their education in three regular school educational environments. Current EL students had a much lower rate of full inclusion (56 percent) compared to non-ELs (64 percent). Students who were not-ELs had a smaller substantially separate rate (30 percent) compared to their 37% for ELs.

Exhibit 5e. Educational Environment Rates by Current EL and Not EL Students



Current State of English Language Support for ELSwD

Interviewees expressed significant concerns about BPS’s current instructional support for English learners, and lack of native language instruction especially for students with little or no understanding of English. The DESE 2020 report also found that the district does not have an ESL curriculum and lacks clear expectations for instruction. Furthermore, BPS has no systems to monitor the delivery of ESL instruction, which is necessary to support emerging English language and literacy skills of English learners. Interviewees echoed DESE and shared that

⁵⁰ Source: Mid-Year Winter MAP Achievement, SY21-22. Source: NWEA (MAP), Aspen (enrollment and demographics). Note: Data includes Irving, Timilty, Jackson-Mann, and Mission Hill schools, which closed at the end of SY21-22.

teachers are “doing their own thing, using monolingual materials that students do not understand.” BPS staff reported to DESE that only 87 percent of ELSwD received ESL instruction from ESL licensed teachers. Staff noted that the district was working to identify the causes and systems leading to this issue.

This discussion ties into the second metric addressed above regarding “100 percent of MLWD to receive appropriate special education and language services regardless of program and/or placement” and action area 2.6 calling for new bilingual services/native language supports across the continuum of special education programs.

Researchers have found English learners without disabilities require about three to five years to become orally fluent in English as a second or additional language, and four to seven years to become academically proficient in the language. This finding highlights the need for instruction in a student’s primary language to support learning while acquiring English, especially for students with disabilities who may require more time to become proficient in a second language.⁵¹

Relatively few BPS models exist to educate students, including those with disabilities, with native language instruction. In addition to this issue, interviewees reported several additional concerns that will require attention to revamp instruction and support. These issues apply to English language development for ELSwD through instruction with/without native language interaction.

- **Funding.** ELSwD are given a double allocation under the WSF, but there is no oversight regarding the manner in which the funds are used. The Budget Guidance does not provide information specific to this issue with associated expectations or requirements.
- **Scheduling.** School schedules are not always designed in a way that gives time for ELSwDs to receive the language support they are to receive from an ESL teacher. DESE also found that ESL and special education teachers did not consistently have time allocated in their regular schedules to plan together for the success of ELSwD.

OSE Policy and Procedure Manual

The PPM addresses ELs suspected of having a disability with a page of generic legal requirements for assessment and less than a page with IEP team considerations for providing special education, related services, and EL services and for ESL instruction. By comparison, the Santa Barbara County SELPA Procedural Handbook has a 32-page comprehensive section addressing this issue. Sections concerning 1) assessment, identification, and programs for ELs; 2) general education interventions for ELs, 3) assessment/identification of ELs for special education; 4) development of linguistically appropriate IEPs; 5) programs/services for ELs with

⁵¹ The Present and Future of Bilingual/ESL Special Education, retrieved from <https://publications.ici.umn.edu/impact/26-1/the-present-and-future-of-bilingual-esl-special-education>

disabilities; and 6) reclassification of ELs with disabilities.⁵² There is separate guidance provided to school psychologists and speech/language pathologists on the assessment of English Learners.

Recommendation 5. English Learners Eligible for Special Education

Significantly improve EL identification for special education and improve instruction for ELSwD, including access to native language instruction.

a. Collaboration between OSE and OMME for ELSwD

Clearly articulate that both OSE and OMME have equal and intersecting responsibilities for the education of English learners with disabilities. Both offices have oversight for personnel necessary to support decisions to evaluate students, engage in assessments, make eligibility determination, support appropriate instruction, and lead professional learning activities.

- **OMME/OSE Strategic Plan.** Begin recognition and operationalization of the disability/language intersection by immediately pulling out Section 2 of the OMME plan and present it as a unified OMME/OSE plan for MLWD. OMME and OSE strategic plans should contain the same language for supporting ELSwDs.
- **Expert External Partner.** Immediately move to implement the OMME provision for use of national experts (§2.2.) Hire an individual with a high level of expertise and significant experience working with urban school districts for the use of MTSS, appropriate identification of ELs for special education, and instructional models as appropriate.
- **Maximize OMME/OSE Collaboration.** Use the external partner as a thought partner with OMME and OSE leaders to expedite decision-making. In the event that decisions stall due to differences of opinion, establish an expectation for the development of executable protocols for resolution, including the points at which to involve the Deputy Superintendent.

b. Expedited Review of OMME and OSE Plan

Use expert partners to closely review the OMME and OSE plan to expedite revisions for clarity, coherence, high expectations, and comprehensiveness. As part of this review have the expert(s) consider the areas described below.

- **Data Collection to Inform Personnel Needs, Instructional Models, Root Cause Analyses, and KPIs**
 - **Student Data.** Gathering ELSwD data by school showing native language and ELD level, grade, and special education setting. With the expert, determine the best way to organize the data to show language support needs by various factors to inform bilingual instructional models.

⁵² Retrieved from <https://www.sbcsepa.org/procedural-handbook/>.

- **Teacher Data.** Gathering data by school showing teacher qualifications regarding EL and SWD to strategically deploy staff to support the instructional needs of ELSwDs.
- **Key Performance Indicators.** Incorporating in KPIs risk ratios for ELs compared to nonELs overall and by disability areas, with maximum targets for areas of concern. With the expert, identify root causes for the identified disparities, such as receipt of appropriate core instruction with increasingly intensive interventions, and evidence-based actions for implementation.
- **Dashboard.** Showing KPI indicators at the school level to inform school-based decision-making and target actions to address outlier data and trends. For example, include an indicator for ELSwD achievement in content areas and progress in acquiring English. Use data results to identify potential schools that may require additional review of service delivery quality at identified schools. (Based in part on 2022 DESE Report)

Complete the above actions **by the beginning of SY2023-24.**

- **Research Partner.** Expediting hiring of a partner to support faster timeframes for data collection and analysis. Complete this action by the **beginning of the SY2022-23 second semester.**
 - **Prior Receipt of Appropriate Instruction**
- **MTSS for English Learners.** Incorporating in BPS’s MTSS Framework components appropriate for ELs. For example, see tools and resources for improving reading and language outcomes for ELs based on three federally funded projects,⁵³ and MTSS for English Learners.⁵⁴
- **Dyslexia Screener.** Using CGCS’s “Considerations for Universal Dyslexia Screening: Ensuring Appropriate Implementation and Instruction for English Learners”⁵⁵ to help identification of a dyslexia screener.

Coordinate time frame with completion of the MTSS Framework included in Recommendation 2.

- **Assessment for Special Education**
- **Bilingual Special Education Personnel Needs.** Collecting data showing current numbers of bilingual assessors by type, language of proficiency, and corresponding data showing need.

⁵³ Retrieved from <https://mtss4els.org/tools>.

⁵⁴ National Center for Systemic Improvement (NCIS), retrieved from <https://ncsi.wested.org/wp-content/uploads/2022/08/NCIS-Pursuing-Equity-for-English-Learners-with-Disabilities-Data-Literacy-Session.pdf> and <https://vimeo.com/734379856>. Upcoming sessions address research-informed practice and systems coherence, retrieved from <https://ncsi.wested.org/resources/pursuing-equity/tlc-pursuing-equity-at-the-intersection-of-language-and-disability/>.

⁵⁵ Retrieved from <https://www.cgcs.org/Page/660> and <https://vimeo.com/718350768>.

- **Language-based Assessment Needs.** Conducting an inventory of current assessments used by psychologists, speech/language pathologists, and other personnel areas along with analysis of their appropriateness for students by native language and categorize evidence-based needs.

Complete the above actions **by the beginning off the SY2023-24.**

- **Instruction**

- **Instructional Models.** Review student achievement data and other holistic measures including attendance, social/emotional needs, by school and type of EL program to evaluate the current level of service required by the DOJ agreement.
- **Early Childhood Education.** Expediting the use of instructional practices that address the need for oral language development in English and other pre-reading skills of English learners. If possible, include oral language development of children’s home language to support overall literacy development.
- **ELs with Intensive Instructional Needs.** Address the professional learning and MTSS guidance needed to support this group of students; see “Supporting English Learners with Intensive Needs,” published by the National Center on Intensive Intervention.⁵⁶
- **Collaborative Planning Time.** Prioritizing time for general education, bilingual education, ESL, and special education personnel to collaboratively plan instruction. (2022 DESE Report)

Unless otherwise stated, coordinate timelines with the OSE/OMME plan.

- **Personnel**

- **Instructional Capacity.** Collecting data showing current numbers of bilingual instructors by certification, including SWD. Use this information to inform human capital recruitment needs and the assignment of instructors to schools (permanent or itinerant assignments and contractual positions).
- **Labor Relations.** Expedite agreement for screening/hiring bilingual personnel used for instruction of students based on their native language.
- **New Hires.** Increasing current OMME strategic plan targets for hiring new bilingual paraeducator and new bilingual special educators.
- **Intensified Recruitment Strategies.** Immediately expedite activities to maximize recruitment, including recruiting highly qualified applicants for the two OSE ELSwD supervisors.

⁵⁶ Retrieved from retrieved from

[https://intensiveintervention.org/resource/supporting-english-learners-intensive-needs.](https://intensiveintervention.org/resource/supporting-english-learners-intensive-needs)

- **Expedited Human Resource (HR) Processing of Hires.** Examining current HR processes delaying onboarding of bilingual (and other) individuals identified by central office and schools. Having process for responsibility to notify the Deputy Superintendent about reasons preventing any processes that cannot be corrected by **January 9, 2023**.
 - **Training**
- **Expectations.** Establishing written expectations for training central office, region, and school-based personnel directly/indirectly involved with the identification, instruction, and support for ELSwD, principals, teachers, and paraeducators. Provide differentiated training based on the audience and post materials on a newly developed OSE/OMME website (described below). Use the Racial Equity Planning Tool to plan these activities.
- **COSE.** In addition to providing comprehensive training for Coordinators of Special Education (COSE), ensuring their monthly meetings and other opportunities exist for them to have conversations about common issues and identify those needing clarification or resolution.
- **Scheduling.** Having training address school scheduling with models that give time for ELSwDs to receive their entitled language support from a supplementary ESL or bilingual teacher.
- **Family Engagement.** Adapting for parents pertinent written information used for BPS personnel. Generously use publicly available and BPS produced videos. Post this material on the OSE/OMME website in languages commonly used by BPS families.

Complete the above actions **by SY2023-24**.

- **OSE/OMME Webpage**
- **Webpage.** Developing an OSE/OMME webpage with an easily identifiable title and access point for BPS personnel and families. Use the webpage to communicate information to all stakeholders on such information as OSE/OMME plan updates, expected procedures/guidance, job openings, etc.
- **Family Engagement.** Posting user-friendly high-interest information for families in BPS common languages. Include information as such OSE/OMME plan updates and what families can expect at the school level, special education parental rights, ways to resolve complaints, etc. In addition, for information about the authentic engagement of family, schools, and community partnerships see National Center for Systemic Improvement's training on this subject.⁵⁷

Complete the above actions **by SY2023-24**.

d. Fiscal Support.

⁵⁷ Retrieved from <https://ncsi.wested.org/wp-content/uploads/2022/09/NCSE-TLC-Pursuing-Equity-for-English-Learner-with-Disabilities-Family-and-Community-Partnerships-Session.pdf> and <https://vimeo.com/747693894>.

Building a Unified System: Inclusive Education Designed to Improve Outcomes for All Students

Consider the use of ESSER funds to support OSE/OMME actions to support these and associated activities. **Complete in time to support budget decisions for SY 2023-24.**

c. Accountability

For relevant actions referred to above, establish accountability measures for implementation practices based on written expectations, associated receipt of expected material and human resources, and training. Complete this action **by SY2023-2**

6. BPS's Configuration of and Support for Special Education

After the federal special education law was executed in 1978, instruction for eligible students was primarily based in classrooms using this categorical service model. At the same time, state certifications for special education teachers were aligned with these disability categories. This model was based on a perception that teachers would be better equipped to educate a set of students aligned with their area of expertise. It also perpetuated the segregation of students with disabilities from their nondisabled peers. During the past 25 years or so, the field began to recognize that disability categories included students with wide ranging characteristics, and much broader areas of need were characterized by poor reading skills, often linked to poor behavior and low social/emotional well-being. Researchers also began to find benefits associated with educating students with/without disabilities together. Furthermore, educators began to understand that except for students with the most significant cognitive disabilities, instruction aligned with the core curriculum, along with supplementary specially designed instruction was necessary to improve educational outcomes.

In spite of these trends, BPS has maintained a highly categorical system for educating students with disabilities, configuring special education in a manner unlike any other in the Council SST's experience.

The BPS Model

BPS special education is based on three types of classroom settings.

Resource

BPS considers this model to be one of "general education." Students with IEPs are the general education classroom enrollment and typically are educated with one dually (general education and special education) and sometimes triple (ESL) certified teacher and a paraprofessional in their school of controlled choice. In other districts about which the Council SST has knowledge, in addition to the general education teacher a special educator provides specially designed instruction either in or outside the regular classroom.

Full Inclusion Setting

This setting has eight strands that are primarily labeled with a disability category, such as SLD. To qualify for a full inclusion setting, a student's IEP must contain at least 240 minutes of special education/related services.⁵⁸ The majority of strands have a class size of 20 with 5 students having an IEP.⁵⁹ The class is staffed with one teacher who typically is certified in general and special education and a paraprofessional who provides support. Unless the current school has a strand appropriate for and with space, the student is placed and transported to the closest school with an age-appropriate strand having available space. In other school districts, students

⁵⁸ Under the MOU between BPS and BTU, except for specified schools, these service minutes will no longer be used for a placement determination once a school's inclusion plan is in place.

⁵⁹ OSE Location Reference Guide

placed in an inclusive setting remain in the current school with a general educator and a special educator supplementing instruction.

BPS uses the full inclusion strand for students who because of their large amount of IEP service minutes would otherwise be educated in substantially separate classroom. Although this setting is less restrictive than a separate classroom, the removal of any choice families would otherwise have for placement is problematic.

Substantially Separate Setting

This model has nine different strands, with most having a disability label, such as SLD. By comparison, the Cleveland Public Schools has five programmatic models, also excluding vision/hearing. Other school districts with which the Council SST is aware have configurations closer to the Cleveland model. As with the full inclusion model, these students are typically placed in another school having an available seat. Furthermore, the Council SST was informed that IEP teams considering IEP minutes for a regular class, the team would have to recognize that implementation is based on “space” availability.⁶⁰ While some schools have figured out how to make such arrangements work, it requires the school-wide planning that by some BPS schools that was shared with the Council SST.

Inclusion and Substantially Separate Placement Rates

The following data show various characteristics of the students who comprise the inclusion and substantially separate 14 different strands. Section 7 addresses the high proportion of students with disabilities who attend a small number of schools, and the concentration of students placed in substantially separate classrooms.

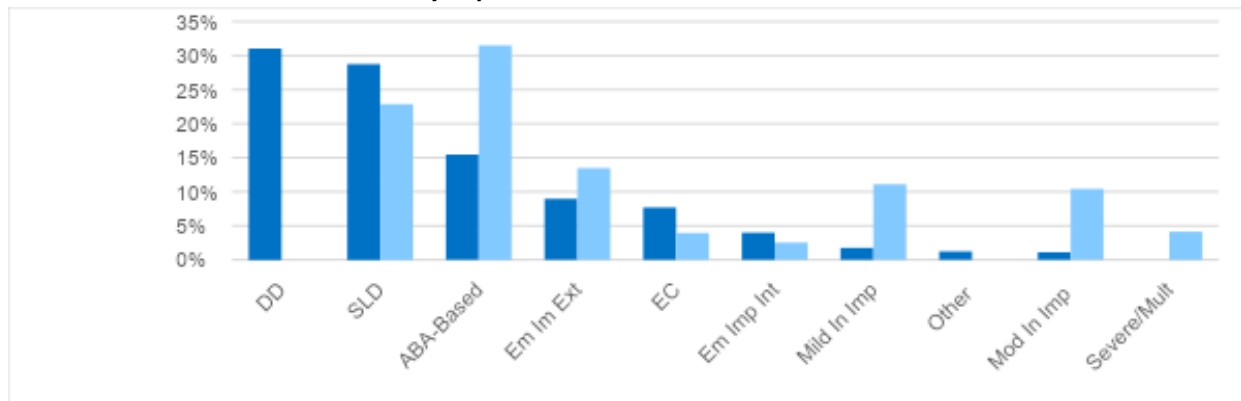
Overall, 5,782 (57 percent) students with disabilities are educated in either an inclusion (43 percent) or substantially separate (57 percent) classroom strand. Of the 5,805 students educated in a full inclusion classroom, 43 percent (2510) are placed by OSE. The remaining students (64 percent) are educated with resource services (which does not require placement or involvement by OSE). BPS differentiates the resource from the inclusion model and refers to these two terms accordingly.

- **Full Inclusion.** Highest rates for this model were DD (31 percent), SLD (29 percent), ABA-based (15 percent), emotional-externalizing (9 percent), and EC (8 percent). The remaining areas ranged between 2 and 1 percent.
- **Substantially Separate.** Highest rates for this model were ABA-based (32 percent), SLD (23 percent), emotional-externalizing (13 percent), mild intellectual (11 percent), and moderate intellectual (10 percent). The remaining areas ranged between 3 and 4 percent.

⁶⁰ The MOU provides new flexibility in this regard.

- **SLD.** 1,470 students are educated in full inclusion and substantially separate strands, and comprise 57 percent of all 2,676 students with SLD.⁶¹

Exhibit 6a. Inclusion and Substantially Separate Placement Rates⁶²



Substantially Separate Risk Ratios for Males by Race/Ethnicity

Using a risk ratio to compare male students in substantially separate strands, the Council SST found two models where males by race/ethnicity were more than twice as likely to be placed. For SLD, the risk ratio for black to white males was 2.2, and for white to Latinx males was 2.4. For emotional impairment-externalizing, the risk ratio for black to white males was 3.8, black to Latinx males was 3.8, and Latinx to males was 2.4. (See Exhibit 5b) According to an OSE SY2022 presentation to the School Committee, black males were 3.13 times more likely than other groups to be educated in the emotional impairment substantially separate strand.⁶³

Exhibit 6b. Risk Ratios of > 2.0 for Substantially Separate Strand by Gender and Race/Ethnicity



Substantially Separate Risk Ratios for Males to Females by Race/Ethnicity

Using a risk ratio to compare males to females in inclusion and substantially separate strands for SLD, ABA-based, DD, emotional-externalizing, and EC, females were more than twice as likely to be placed for 11 inclusion strands and 10 substantially separate strands. The highest male risk

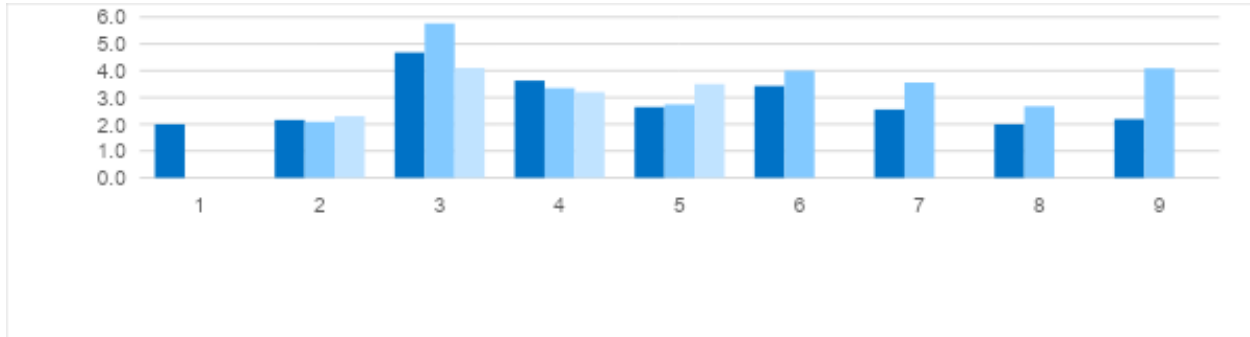
⁶¹ BPS data provided to the Council SST, tab #19.

⁶² Source: Enrollment by substantially separate strand as reported in Aspen, October 2021. Includes students enrolled in Horace Mann Charter Schools. The “other” inclusion program includes students with hearing, vision, and physical/multiple impairments. Severe/multiple disabilities includes students enrolled in multiple/physical impairment strands and students enrolled in the Condon program

⁶³ State and National Trends in Special Education, SY2122 OSE School Committee Slides

ratios were for ABA-based inclusion for Latinx (5.8), black (4.7) and white (4.1), and for emotional-externalizing for Latinx (4.0). ABA-based substantially separate risk ratios were also high for black (3.6), Latinx (3.4), and white (3.2). (See Exhibit 5c.)

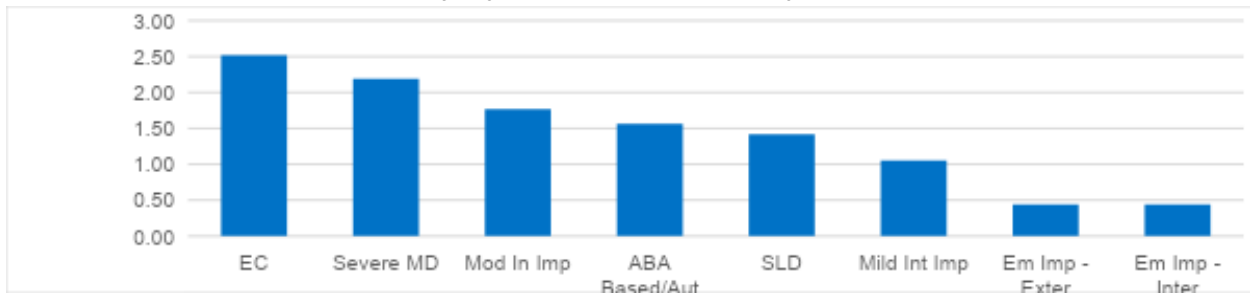
6c. Risk Ratios Over 2.0 by Sped Placement Comparing Males to Females by Black, Latinx, and White Groups



Substantially Separate Risk Ratios by English Learner Status

EL students were more than twice as likely than non-EL students to be placed in substantially separate classrooms for EC (2.52 risk ratio), and severe multiple disability (2.19 risk ratio). (See Exhibit 5d.) According to a SY 2122 OSE presentation, English learners with a communication impairment were 2.5 times more likely than other groups to receive education in a substantially separate strand.⁶⁴

Exhibit 6d. Risk Ratios for Substantially Separate Strands for EL Compared to Not EL Students⁶⁵



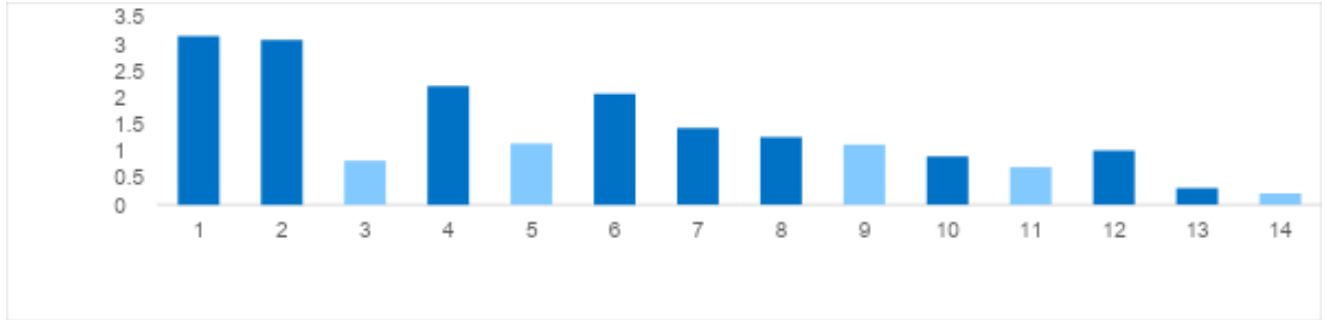
Risk Ratios for Inclusive/Substantially Separate Strands by Economic Disadvantage Status

Overall, of all students in an inclusive or substantially separate strand 85 percent have an economic disadvantage status. Of those in an inclusive strand, 82 percent had this status and of those in a substantially separate strand, 88 percent had this status. Exhibit 5f shows risk ratios comparing students with an economic disadvantage status to those who do not. The substantially separate strands have the highest risk ratios for mild intellectual (3.14), emotional – external (3.07), SLD (2.21), and moderate intellectual (2.07). The remaining areas have risk ratios under “2.” (See Exhibit 5f.)

⁶⁴ State and National Trends in Special Education, SY2122 OSE School Committee Slides.

⁶⁵ The severe multiple disabilities category includes students enrolled in the multiple/physical impairment strands and students enrolled at the Carter School and Condon programs

Exhibit 6e. Risk Ratio Strands by Inclusivity by Economic Disadvantage Status⁶⁶



McKinley Schools

The May 2022 Systemic Improvement Plan included actions pertaining to the McKinley Schools, which comprise four schools (elementary, middle, middle/high school, and high schools). The McKinley activities included the engagement of a McKinley Schools Working Group (Working Group) that would in relevant part implement recommendations of the McKinley Schools Intervention Team (August through June 30, 2023). In addition to the charge laid out in the Systemic Improvement Plan, the Working Group identified the following important focus areas that need to be addressed to accelerated dramatic improvements for the McKinley School –

1. Ensure a deep-seated belief that all students are learners capable of mastering rigorous, standards-based content while addressing their social/emotional needs which will enable them to reach their full potential.
2. Operate as a **short-term therapeutic placement** for students and ensure students are equipped with the social and emotional skills so they can return to integrated settings and thrive in less restrictive settings on a much faster timeline.
3. Develop **more aggressive systems and academic content**, with an emphasis on access to grade level standards; universally designed and individualized instruction to support students to make effective progress toward IEP goals and success in their least restrictive environment.
4. **Integrate therapeutic support with rigorous academic content**, including training and professional development for faculty and staff so that they have the knowledge and skill for seamlessly integrating therapeutic and academic instruction.
5. **Address underlying reading/math disabilities, including dyslexia and dyscalculia, and/or gaps in instruction**, which prevent reading fluency in students, and ensure effective reading and math interventions are in place for all students who need them.

Academic Achievement and Student Demographics

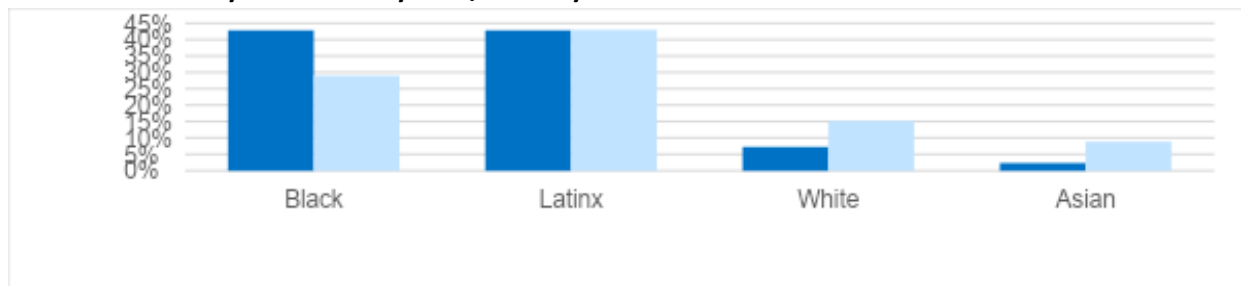
Data from MA Schools and District Profiles (2020-21) posted achievement data for McKinley. This data showed that McKinley student achievement was very low. MCAS meet/exceed rates

⁶⁶ Economically Disadvantaged status is reported in place of Free and Reduced Price Lunch (FRPL).

for 3rd-8th grades for ELA was 3 percent, math was 2 percent, and science was 3 percent. Not meeting expectations for ELA was 59 percent, math was 67 percent, and science was 61 percent. At 10th grade: 0 were proficient/higher, 60 percent needed improvement, and 40 percent were in the warning/failing group.⁶⁷

Black students comprised 42.9 percent of McKinley’s student enrollment, almost 14 percentage points higher than BPS’s 29.0 percent rate. The 7.3 percent rate for white students was less than half the 15.2 percent BPS rate. Similarly, the Asian 2.3 percent rate was almost 4 times smaller than the district’s 8.9 percent rate. The enrollment for Latinx students was about the same as the districtwide rate (42.9 percent compared to 43.0 percent).⁶⁸ (See Exhibit 6a.)

Exhibit 6a. McKinley Enrollment by Race/Ethnicity



Additional data from the state profiles show 31.1 percent of McKinley students had a first language that was not English, and 24.7 percent were English learners. A large 90 percent of the students were low income, compared to BPS’s rate of 71.2 percent.⁶⁹

Protocol for Placing Students at McKinley Schools

In response to a Council SST information request for any protocol(s) or guidance to determine if a separate school was necessary to implement a student’s IEP, BPS wrote, “This is an IEP team decision.” However, a protocol for McKinley School placement was provided. That document addressed temporary and “full” placements. Unspecified supports and tiered interventions, including a functional behavior assessment and behavior intervention plan, are to be tried prior to considering a temporary placement at McKinley. Other than documenting these activities, no additional guidance is provided, including a need for several observations across by an impartial individual with experience and knowledge of specially designed instruction/services that are effective for students with emotional impairments. Also, other than reviewing a student’s formal assessments, no additional information is provided to guide placement decisions for students new to a separate school placement based on an emotional impairment.

⁶⁷ Retrieved from https://profiles.doe.mass.edu/mcas/achievement_level.aspx?linkid=32&orgcode=00350363&orgtypecode=6&

⁶⁸ Retrieved from <https://profiles.doe.mass.edu/general/general.aspx?topNavID=1&leftNavId=100&orgcode=00350363&orgtypecode=6>

⁶⁹ Retrieved from <https://profiles.doe.mass.edu/general/general.aspx?topNavID=1&leftNavId=100&orgcode=00350000&orgtypecode=5>.

Interviews

The McKinley schools, for 219 students, are supported by two program directors, a team of clinicians that support community-based wraparound services. Staff descriptions did not include any board certified behavior analysts (BCBA), even though the knowledge and expertise of this personnel in the area of applied behavior analysis, positive behavior support, and trauma informed practices would be beneficial. The FY23 Budget Guidance requires BCBA's for ABA-based strands.

Interviewees communicated –

- Strong sense of community among McKinley staff and pride in their school.
- Perceptions that outside of McKinley the students were perceived as “scary,” and some students perceived their placement as “jail.”
- Desire to probe deeply into McKinley student histories to explore their path to the school. Based on discussions between staff and parents, some reasons included family crises, traumatic events, unaddressed reading problems, unhousing, family separation, etc. There was a strong perception that racial bias and profiling contribute to pathway to the school.
- Need to increase the voice of youth to better understand their concerns and support improvements. There was also support for more individual interactions with students by adults who had a similar path as a youth and could share what helped them on their path. Also mentioned was need for after school enrichment activities and opportunities for students to attend both McKinley and a regular school part time if an IEP team believed this model would be beneficial. A satellite program at two high schools has been eliminated.
- Family members overwhelmed at IEP meetings, and unable to understand the academic language written and spoken. There is a desire for more support to them so they can meaningfully contribute to discussions and advocate for their child.

The Council team also asked interviews how IEP teams determine if a student needing a separate school would attend a public or private day school. Various answers such as the following were given, but none referred to any protocol or written guidance.

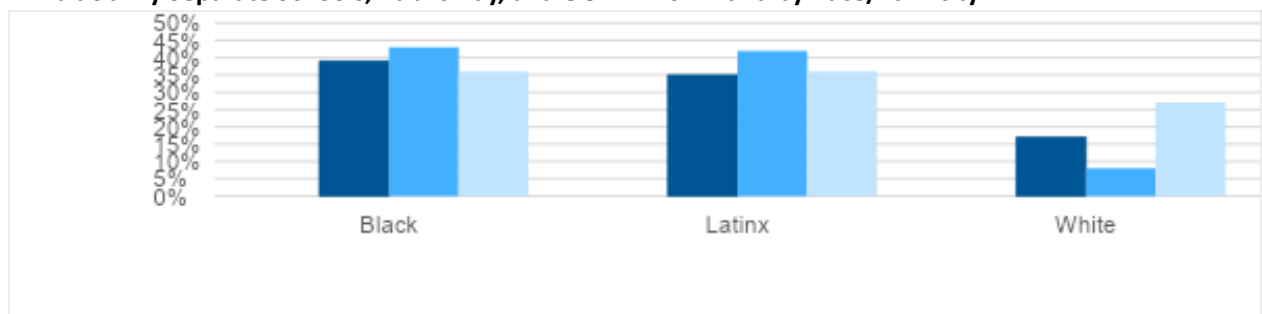
- Some responses were associated with perceptions of racial profiling, with white students viewed as having mental health issues and significant efforts are made to keep them enrolled in regular schools. Interviewees did not believe similar efforts were made for black students who instead were viewed as dangerous.
- Others were told that placement was based on students’ level of need, McKinley seat availability, and settlement agreements that required an out-of-district (OOD) placement. This response initiated a discussion of whether OOD schools are superior or if this is a perception based on how they look, etc.

Public Day and Private Day School Demographics and Transportation

Based on the above discussion regarding public and private day placement the Council SST used BPS data to compare these settings by race/ethnicity. This analysis confirmed perceptions that students of color are disproportionately placed in public day schools while white students predominantly educated in private day schools. Overall, black student rates were disproportionately higher for public than private day, white student rates were disproportionately higher for private than public schools, and Latinx student rates were disproportionately lower for private than public day placement.

- **Public Day.** The students in this group were 43 percent black (8 percentage points higher than the BPS rate), compared to 8 percent for white students (4 points lower than the BPS rate) and 42 percent for Latinx students (3 points lower than the BPS rate).
- **Private Day.** The students in this group were 27 percent white (15 points higher than the BPS rate), compared to 36 percent for black students (7 points lower than the BPS rate) and 36 percent for Latinx students (9 points lower than the BPS rate).

Exhibit 6b. By Separate Schools, Public Day, and OOD: All SwD and by Race/Ethnicity



There are significant fiscal and transportation issues associated with OOD placements. The Council SST was informed that the budget for OODs is about \$43 million for next year. Also, while an in-district bus route is about \$44/day the OOD cost is about \$166/day. Furthermore, bus routes are longer for those schools that are located a significant distance from students' residences.

Contributors to BPS's Restrictive Special Education Placements

Interviewees generally concurred that there is an inconsistent understanding of inclusion in BPS, with every school having different practice expectations. Where inclusive practices have occurred, they have been driven by individual school efforts with inconsistent results and led to a dichotomous approach with inequitable results. With the district's the start and stop history of addressing this issue, central, regional, and school leaders individually address biases perpetuating segregation and inadequate instructional practices and supports. As one interviewee stated, "Autonomy is good but there has to be accountability so there should be some direction on what inclusion is going to look like across the district." There is great thirst for clear guidance with systemic training and supports for effective implementation.

This feedback, and BPS's configuration of special education that has led to a larger proportion of students educated in separate classrooms compared to the state and nation is particularly troublesome given the Hehir Associates' second finding in their review of MA special education. According to this finding, students with disabilities who were educated at least 80 percent of the day in general education classes appeared to outperform similar students lacked this opportunity. These students also had a higher probability of graduating high school than students with disabilities educated in substantially separate settings.

Making Placement Decisions

As part of the IEP process, a student's team 1) describes the specialized instruction, related services, and supplementary aids/services (instruction/services) needed for a student to meet each IEP annual goal, 2) determines the amount of time needed for each area of instruction/services, and 3) identifies the location for each area of instruction/service, i.e., inside or outside a general education class. These determinations are expected to produce a final conclusion about the extent it is appropriate for the student to be educated within the general education classroom.

Rather than follow this process, Interviewees reported that IEP teams typically recommend instruction/service amounts to align with the program or setting that the team has in mind when designing the IEP. Due to BPS's rigid structures of minutes and placement code, IEP team participants must prescribe over 240 minutes of instruction/services to support a strand for full inclusion (in general education) or substantially separate instruction (outside general education). Generally then, the placement conversation drives the instruction/services conversation rather than the reverse. In a monitoring report DESE found that BPS had "not address[ed] the need to ensure that IEP Teams always state ... why removal from the general education classroom is considered critical to a student's program." (SE 34 Criterion)

The MOU establishes conditions for eliminating the 240 minute criteria and several other restrictions that have governed placement decisions. This circumstance was welcomed by interviewees, but they also stressed the commitment, supports, and actions BPS must take to meet these conditions and move forward.

Use of Multiple Licensed Teachers

Many focus group participants expressed concern about BPS's use of teachers with dual and even triple certificates (for general education, special education, and ESL). They reported that one teacher could not meet all students' educational needs effectively when, even with paraprofessional support, are expected to provide core curricular instruction, specially designed instruction, and accommodations, as well as possibly needing to meet the language acquisition needs of English learners. As discussed further below in this document, BPS reported having 1,643 FTE special educators, which based on the number of students with IEPs gives a ratio of 6.2 students for each. With this ratio the district ranks 2nd of the 80 districts in lowest student to staff ratio for which the Council SST has collected data over time. We have a working belief that

the district's low student teacher ratio is a function of the use of dually certified general/special educators, and these teachers are "counted" as special educators.

Other districts with which the Council team has worked have used dual EL certified teachers (along with general or special education). No districts we are familiar with use dually certified general/special educators to meet the needs of all of their students, even with paraeducator support. These districts rely on general educators to provide core instruction and special educators who provide specially designed instruction using an in-class or pull-out model. Reportedly, very few BPS schools use this model. There also seems to be limited flexibility in how staff is used based on student needs and is dependent on the individual school. The MOU addresses this issue in a positive manner and states, "The parties recognize that dual/triple licensure will not be considered as a sole service delivery model and that models including at least two educators should be considered first to meet requirements in students IEPs in the least restrictive environment and ESL services."

New Teacher Support

Interviewees disrupted the long-held assumption that teachers with high levels of expertise in educating students with the same or similar disability category would be available to teach students with characteristics aligned with their areas of need in inclusion and substantially separate classrooms. BPS reported to the Council SST that 253 FTE special education positions were vacant, accounting for 15 percent of all reported positions. Interviewees shared that many special educators are new and have gone through expedited licensure routes for non-licensed educators with a bachelor's degree and at least one year of teaching experience. While this approach is not unusual for school districts, and furthers BPS's goal of increasing the "cultural, racial, and linguistic diversity of [its] workforce,"⁷⁰ concerns were expressed that these teachers have not received the initial and ongoing training/support they need to effectively plan and provide specially designed instruction, particularly for students in inclusion and separate class strands.

Rules-based Reading Instruction

Various interviewees addressed the large proportion of students with disabilities with poor reading achievement, and their need for rules-based reading instruction to be successful. Although it appears that a significant number of teachers have been trained, there are barriers to implementation. In the previous section that addressed MTSS, the absence of a data base to track teachers who have received training in an Orton-Gillingham based multi-sensory reading program makes it more difficult to coordinate instruction and materials. Also, the absence of priority scheduling makes flexible grouping for students with common needs more difficult.

As reported above, BPS educated more than four times the proportion of students with SLD (18 percent) in substantially separate classrooms compared to the state and nation (each with 4 percent). Based on the experience of the Council SST, these students are removed from general

⁷⁰ Pathways to Teaching and Licensure in Boston, retrieved from https://docshare.tips/bps-pathways-to-licensure_582a9a12b6d87fbdaa8b4f42.html.

education classrooms primarily because of their reading difficulties. Interviewees discussed the need for more a different approach for resource teachers. Some suggested that school administrators use an all hands on deck to train or find trained school-based personnel to provide rules based reading using flexible grouping. Such an approach would enable more students with reading instructional needs to remain within general education.

Transportation

BPS's reliance on both inclusion classes and substantially separate strands impacts the transportation system, which must transport these students to distant schools. In addition to the cost associated with bussing, driver shortages and travel time is impacted. DESE's 2022 report found "BPS has not made progress in tackling systemic barriers to district improvement such as overhauling the school assignment system, which concentrates high levels of student need in a fraction of the district's schools or securing significant changes to the transportation contract, which is a major barrier to dependable transportation services for all students." According to the agency, on-time bus arrival rates remain unacceptably low and students with uncovered routes do not attend school that day; these circumstances disproportionately impact students with disabilities.

OSE Organization

As discussed further below in Section 8, it is noteworthy here to address how OSE is organized to support teaching/learning in each of the strand programs. The OSE organizational chart lists for the Applied Behavior Analysis (ABA), which primarily supports students with autism, an assistant director, 18 program directors, 166 ABA specialists, and 30 coverage paraprofessionals. Without passing judgement about the nature of this support, it is remarkable when compared to the lack of support for the other strands. Although this support may not be present on the organizational chart, the Budget Guidance indicated that for the emotional impairment strand a program specialist and a 1.0 clinical coordinator is allocated for each group of 40 students at a school, with FTE increments delineated by various ranges. However, the organizational chart did not show any position to support these personnel, including the development of such tools as high quality instruction/service expectations, professional development, school walk through templates, etc. The Budget Guidance did not reference any other strand with an accompanying expectation for program specialists. It is not realistic to expect each of the assistant directors to have the expertise or bandwidth needed for the strands other than ABA to individually provide the support required by school leaders and personnel, including program specialists, especially as they explore and implement different models for educating students in more inclusive settings.

Professional Learning

The DESE 2022 report documented the systemic professional development issues that Council SST interviewees communicated throughout interviews. A common statement was that PD was not robust for any teacher." In addition to new teachers who need significant support, special educators who have taught students within one program model reported that they needed

additional training when they transitioned to a different model, such as resource to a substantially separate classroom.

As noted by the DESE report, the BTU collective bargaining agreement currently restricts the number of PD hours for teachers in traditional schools to 30 hours. Twelve hours are district-led and the remaining 18 are school-based. Interviewees noted that in the 2022-2023 school year, schools will be required to use 15 hours of their school-based PD hours on Equitable Literacy, leaving many traditional schools with only three remaining hours of available school-based PD time. Unlike Innovation schools that are not bound by these terms, traditional schools lack this flexibility. Also, timelines require approval of the PD calendar during the prior year's spring, which restricts responses to changing learning needs of teachers and students. Interviewees told DESE and the Council SST that school leaders/ILTs were better able to leverage professional learning opportunities to address teaching/learning needs. This level of self-help and creativity leads to unnecessary disparities in the availability of knowledge, and development of expertise and skills necessary to improve achievement and social/emotional well-being.

These circumstances must change for BPS to implement its instructional priorities, including the facilitation of professional learning necessary to implement the Council SST recommendations.

Fiscal Support

BPS funds special education through OSE funded services and school-based budgeting with special education costs determined through Weighted Student Funding (WSF) formulas. Centrally funded services include related services, such as speech/language, occupational/physical therapy, ABA services. Also, additional FTE personnel for specific programs. Funded services also include 1 to 1 paraprofessionals and bus monitors.

The WSF categorizes special education funding that supplements each school's per pupil foundation, which is based on each school's composition of students educated in resource and full inclusion/substantially separate classrooms. These settings are differentiated by the number of minutes/day each student (by setting) receives specially designed instruction/services.⁷¹ Each school's funding is determined prior to the start of the school year, if data shows that school needs have changed, the Strategic Enrollment Action Team can allocate additional funding

- **Resource.** This setting is differentiated by severity, with a designation of low (less than 90 minutes/day) and moderate (91 to 239 minutes, or <4 hours per day). Corresponding weights are 1.0 and 1.4, respectively. Note: the moderate setting includes students receiving one more minute of services than those in the full inclusion/substantially separate categories.
- **Full inclusion/substantially separate.** This setting pertains to students receiving at least 240 minutes/day of services and is differentiated by eight categories, which are primarily disability based: autism, DD, EC (ages 3-4 and 5-6), emotional impairment, intellectual impairment, multiple disabilities, vision, SLD, and full inclusion (high complexity), which

⁷¹ Boston Public Schools FY23 Weighted Student Funding Budget Template

is not defined. These categories have WSF allocations ranging from 1.9 (EC, ages 5-6) to 6.8 (DD).

The WSF Budget Template includes weights for English learners and Students with Limited or Interrupted Formal Education, which range from 0.24 to 0.94, but have no specified rates for these students who also have disabilities.

<u>FY22 Weight</u>	
Low Severity (resource room)	1.00
Moderate Severity (resource room)	1.40
High Severity (full inclusion or substantially separate)	
Autism	4.00
Developmental Delay	6.80
Early Childhood (Ages 3-4)	2.50
Early Childhood (Ages 5-6)	1.90
Emotional Impairment	2.80
Full Inclusion - High Complexity	4.40
Inclusion - Unknown Disability	3.10
Intellectual Impairment	2.10
Multiple Disabilities	4.90
Physical Impairment	4.40
Sensory Impairment: Vision	3.10
Specific Learning Disability	2.10

[FY23 Budget Collaborative and Probable Organization Guidance \(Dec. 10, 2021\)](#)

The Guidance document was produced through a collaborative process between the budget department, school leaders and central office liaisons. The document is reviewed annually by a team that includes OSE representatives. The Council SST identified the following sections for comment.

- **Resource in Inclusion:** The services for a resource student placed in an inclusion classroom must be delivered by a certified Special Education Teacher and not the Inclusion Classroom Teacher, this is an ongoing expectation. It is not clear what this provision relates to as interviewees consistently separated students educated with a resource model from those educated with an inclusion classroom model. Furthermore, comments frequently referred to the use of multi-certified teachers for the full inclusion model, which has negated the use of a general educator and push-in or pull out services.
- **Interaction with Nondisabled Peers.** When budgeting for students in substantially separate settings, students are expected to be with their peers as much as possible during the school day. The IEP is generally written for 240 minutes a day out of the general education setting. About two hours a day remain for students to be with their peers in general education settings. As discussed above, interviewees shared that such interaction is not possible when they are told “space” or “seat” is unavailable in general education classes for student participation.

- **Rules-based reading:** School leaders should identify special education teacher(s) in their buildings who can be responsible for providing rules-based reading services to students as required by their IEPs. These teachers should have flexibility in their schedules to accommodate the school’s specific needs. This guidance unnecessarily restricts rules-based training for teachers of students with disabilities. Such training is important for teachers of students without disabilities, particularly those identified as having dyslexia. This restriction limiting training to special educators and holding them responsible for providing this instruction contributes to an overuse of special education to address students’ reading difficulties.
- **English Learner Students with Disabilities (ELSwDs).** Although there is no separate WSF category for these students, the guidance asks that the following be considered when budgeting and planning for classroom staff and supports:
 - How many ELSwDs in substantially separate or inclusion settings do you have in your school?
 - What are students’ ELD levels, grade bands, and their first/home languages?
 - How are you addressing the linguistic needs of your ELSwDs in the classroom and/or through supported services?
 - For ELSwD Substantially Separate Classrooms have you planned for sufficient ESL FTEs to ensure that all your sub-separate ELSwDs are serviced accordingly?

The Guidance highly recommended that teachers/service providers of ELSwD be able to provide native language clarification to best support the education of these students. As this report addresses in the “English Learners with Disabilities” section, interviewees expressed significant concerns that BPS has not established an infrastructure or process to connect native language support for ELSwD and the cost of materials to meet ELSwD needs. Thus, although this recommendation has merit, it does not yet have a foundation for implementation.

With a declining district enrollment BPS has recognized “that the WSF model has impacted school communities unequally across the district and that this method too narrowly constrains school funding ...”⁷² With this recognition, BPS has begun the process to reimagine its school funding methodology used to determine school level allocations of funds.

DESE’s 2022 report found that BPS’s current funding model allocated funds for students with disabilities based on disability type, which may not sufficiently address diverse student needs and has the effect of students being funded by disability type results in students routinely being placed into disability-specific strands within certain schools. This relationship exists despite written guidance about the use of special education related funds to support students in the least restrictive environment. The report also found the funding model does not provide adequate support to Transformation School. The Council SST agrees and that the WSF

⁷² Reimagining School Funding, retrieved from <https://www.bostonpublicschools.org/Page/8968>.

framework needs modification to more flexibly address the specially designed instruction that each student needs to –

- Advance appropriately toward attaining the annual goals,
- Be involved in and make progress in the general education curriculum and participate in extracurricular and other nonacademic activities, and
- Be educated and participate with other students with/without disabilities in general education classes.⁷³

Family Involvement

One of the most effective means of ensuring academic success is to engage families in their children’s education. While family engagement confers benefits to all students, those with disabilities often require a greater degree of parental involvement and advocacy than their peers without disabilities to be assured of receiving the same level of instruction as the general student population. Children with disabilities often face multifaceted classroom challenges requiring special attention from instructors and active engagement from their families. Their families play a number of supporting roles, including being advocates and providing valuable insight into their specific needs to instructors, who may at times feel pressed by trying to meet the needs of diverse groups of students. There are rarely any simple answers to balancing the needs of each individual child with disabilities with others’ needs, with competing structural, bureaucratic, pedagogical, and emotional factors often adding extra layers of effort and complexity for everyone involved. But when families and educators work together as partners, it enhances the likelihood that children with disabilities will have positive and successful learning experiences.⁷⁴

BPS’s organization includes a family engagement practice team that works with family liaisons in every school. The goal is to build capacity within schools to be a resource for families, including those with children receiving special education. In the experience of family members with whom the Council SST spoke, family engagement is often an afterthought, and their feedback is not taken seriously or with respect. One example was the miscommunication regarding our meeting, which delayed its starting time.

Interviewees also asked for more access to training that focused on the issues of importance to families, and for childcare so more family members could attend. They also believe there is a need for more communication between the school and home, which could be addressed

⁷³ IDEA regulation at §300.320 Definition of individualized education program.

⁷⁴ Family Engagement and Children with Disabilities: A Resource Guide for Educators and Parents, Harvard Family Research Project, retrieved from <https://ctserc.org/documents/resources/Family%20Engagement%20and%20Children%20With%20Disabilities%20A%20Resource%20for%20Educators.pdf>.

through a daily communication tool. Periodically this information could share how children are progressing, and more frequently report positive highlights about the day or issues that need follow up attention.

The OMME strategic plan included several items relevant to families of MLWDs that are relevant also to all SwDs. For example, action step 2.1.i specifies the creation of a district process for multilingual families to report concerns or equitable access to opportunities for MLWDs in their native language; and capture data on issues to report to Superintendent, SPEDPAC and EL Taskforce ELSWD Subcommittee. Also, area 5 concerns partnership with youth, families, and others to increase opportunities for program options towards college and career readiness. Although not referenced, various action steps are relevant to students with disabilities, including ELSwD, such as –

- Identify ML student and family needs to better coordinate resources/services across BPS and the city (social/emotional, trauma, and mental health support)
- Disaggregate monthly MTSSS chronic absenteeism data and provide coordinated outreach to students/families. (annually beginning November and each month thereafter)

Recommendation 6.1. Revisioning and Instituting Inclusive Instruction Practices

Establish a broad vision of inclusive practices and a unified system of service delivery that is culturally responsive/linguistically appropriate, robust, and sufficiently flexible for a larger group of SwDs to learn together with peers without disabilities in general education classes for varying amounts of time. To actualize this vision, give schools the human and material resources needed to 1) improve instruction, 2) better academic and positive behavior/social-emotional wellness, 3) reduce racial/ethnic disparities of students currently educated in restrictive classrooms and special schools.

a. Commitment to Inclusive Practices and a Unified System of Service Delivery

Reinforce the BTU/BPS MOU by executing a School Committee Inclusion Policy and Superintendent’s Circular expressing a strong commitment to increasing inclusive opportunities for students with disabilities. Have the Policy and Circular set expectations for district practices, with amendments as school implementation proceeds. Include in the Policy and/or Circular fundamental elements of inclusiveness, such as the following research-based provisions that benefit all students.⁷⁵

A unified system of service delivery is based on the premise that *all* students (such as those typically developing, with disabilities, learning English, ELSwD, ELSwD, from culturally diverse backgrounds and different economic statuses) are accepted and valued for their unique abilities and included as integral members of each school. A district implementing a unified system of service delivery provides a continuum of services and supports in every school to meet this

⁷⁵ *ibid.* The posting includes all research citations and full references.

premise. Schools practicing inclusive instruction give appropriate education to all student groups together, given appropriate *supports*.⁷⁶ Below are the elements of Inclusive school improvement and should be included in the circular.

- Systemic change that challenges views of disability—not as inherent problems within a student, but as a process for identifying and removing barriers to improve participation and achievement of all students.
- Administrative leadership commitment, MTSS, family and community partnership, an inclusive educational framework (including organizational structure and school culture), intentional consideration of and support for student’s linguistic and cultural diversity, and policies/practices providing the backbone to these features.
- A rethinking of traditional service delivery models.
- The reorganization of education systems, structures, and resources to better meet the needs of all students within one integrated educational framework.⁷⁷
- Inclusive education is not just about students with disabilities, but also about increasing access, participation, and outcomes for all students who are marginalized.⁷⁸
- Strong and authentic engagement with families with intentional communication structures to facilitate active school personnel and family collaboration.

The Council SST emphasizes that a unified system of service delivery does not preclude any instruction of students in separate classes for varying periods of time, or instruction in a separate school. Given BPS’s overreliance on these models for a disproportionately high number of students, particularly males of color and ELSwD, systemic change is needed to disrupt this pattern that has been accompanied by low achievement and expectations. The circular and guidance documents must explicitly communicate appropriate MTSS and equity practices that schools should engage in to promote a unified service delivery system.

- **Time frame: Complete by the beginning of SY2023-24.**

b. District MTSS Leadership Team

Have an MTSS Leadership Team (with key instructional staff representing all students) oversee the development, implementation, and monitoring of actions necessary for BPS to become a unified system of service delivery. Expedite hiring a person with expertise and experience leading systemic change that promotes inclusion in urban schools to partner in the development process so it can be done in an accelerated but knowledgeable manner. The process needs to address current barriers to inclusion and set a foundation of expectations for school-based planning and implementation practice. (See 6c below.) The process includes a

⁷⁶ School Improvement through Inclusive Education, <https://www.oxfordbibliographies.com/view/document/obo-9780199756810/obo-9780199756810-0191.xml>

⁷⁷ *ibid* and [Artiles and Kozleski 2016](#)

⁷⁸ [McLeskey, et al. 2014](#) *Id.* The posting includes all research citations and full references. For additional research see the Iris Center, retrieved from <https://iris.peabody.vanderbilt.edu/module/inc/#content>

phased-in plan that when completed by 2026-27 will encompass all schools. The Council SST agrees with Liasidou 2015 that “change requires time for planning before systemic changes are implemented.”⁷⁹ (See 6d below)

Time frame: Complete by the beginning of second semester, SY2022-23.

c. Centrally Developed Components Necessary to Support School-based Inclusion Planning

For appropriate school-based planning to occur BPS must change conditions to create the opportunity and capacity for inclusion. Use external expert partner(s) to collaborate with District MTSS Leadership Team representatives to recommend changes to conditions below that restrict inclusion capacity. Bring proposed resolutions to the full Team.

- **Current Special Education Configuration.** There are several significant and atypical components of BPS’s current special education configuration that require immediate attention and change.
 - **Full Inclusion Categorical Classrooms.** The current use of eight different categorical program strands, e.g., SLD, that are designated as “full inclusion” was a well-intended unique model designed to provide students who would otherwise be educated in substantially separate classrooms the opportunity to learn alongside students without IEPs. This model, however, has had serious unintended consequences, typically requiring students to be “placed” in a different school having classroom space availability. The long-time use of this model, along with the district’s use of controlled school choice, presents BPS unique and more difficult challenges than typical for other districts. First, BPS’s current configuration has a disproportionately high number of schools hosting both full inclusion and substantially separate classrooms, with larger proportions of SwDs. Changing to an inclusion model in these host schools has a greater impact on general education inclusive instruction than other schools. Second, without reference to a predictable home school makes it more difficult to coordinate needed support for students to transition from the “placement” to their “home” school.
 - **Partial Inclusion.** BPS has not proportionally used the partial inclusion setting, which includes students educated within regular⁸⁰ classes from 79 to 40 percent of the time. (In other words, these students are educated in separate classrooms from 21 to 60 percent of the time.) As a result, SwDs have primarily received instruction either through a resource model based on regular classroom instruction or placement in another school. As addressed above, simply moving students from full inclusion or substantially separate classrooms to regular classrooms in current schools will significantly impact regular class instruction.

⁷⁹ id. School Improvement through Inclusive Education.

⁸⁰ To aid easier reading, the term “regular” class includes bilingual and dual language classes.

- **Substantially Separate Categorical Classrooms.** With at least nine program strands, primarily associated with a disability category, students educated in these classrooms are able to engage in regular classroom activities (less than 40 percent of the time) when it is determined that space is available.
- **Redesign of Specially Designed Instruction (SDI) Models.** Establish models for the delivery of SDI that are flexible and not based primarily on a student’s disability category. Use the following principles for the development of these models.
 - **Aligned SDI/RS to authentic student needs.** This means that IEPs are faithfully aligned to each student’s disability associated needs, including—
 - **IEP goals** designed to a) meet disability associated needs, b) afford involvement and making progress in the core curriculum (or alternate achievement standards) and meeting other associated disability needs.
 - **Evidence-based Statements of SDI/RS and supplementary aids/services (SAS)⁸¹ by goal.** Use evidence-based statements⁸² by goal to enable students to a) progress toward meeting annual goals and b) be educated and participate with their nondisabled peers.
 - **Minutes of SDI/RS and SAS Aligned with Goals/Statements**
 - **Increased availability of rules-based reading instruction.** Enable SwDs to receive rules-based reading in their current school so this need does not lead to placement elsewhere. Establish models for increasing and accessing trained school personnel, using flexible groupings of students with/without IEPs who would benefit from this instructional approach.
 - **Education in regular classes not dependent on placement in another school.** To support inclusive education, there must be opportunities for students to remain in regular classes for varying periods of time, with SDI/RS and SAS given in and outside the classroom with the use of flexible groupings of students. These students may include students with/without IEPs.
 - **Substantially reduced number of substantially separate strands.** More typically, districts organize such clustered sites by cross categorical, intensive behavior, low

⁸¹ Supplementary aids/services include but are not limited to adapted equipment (e.g., pencil grip); assistive technology; training for staff, student and/or parents; adapted materials (e.g., books on tape) and paraprofessional support.

⁸² The Council SST notes that evidence-based SDI/RS has grown significantly. See, for example, the federally funded IRIS Center, which is housed at Vanderbilt Peabody College, is dedicated to improving educational outcomes for all students through the use of effective evidence-based practices and interventions. Retrieved from <https://iris.peabody.vanderbilt.edu/>. Those for mathematics, retrieved from https://doe.virginia.gov/special_ed/disabilities/learning_disability/swd-mathematics-resources.pdf

- incidence (students receiving education aligned with alternate achievement standards), and medically fragile. Also, school districts have clustered sites to support students when needed to address vision or hearing impairments.
- **Increased flexible time in regular/bilingual classes.** Determine how students in substantially separate strands can spend time in regular/bilingual classes (e.g., up to 40 percent of the day per IEP) when space constraints are present.
 - **Increased resource model flexibility.** To embrace the education of SwD more fully in regular classes, supplemented by SDI/SAS, the model must address how the resource model may be expanded taking into consideration potential barriers, bargaining considerations, etc. Generally, consider students in the strands below who participate in the MCAS and are expected to receive education aligned with the core curriculum.
 - **First,** target attention on students in the following full inclusion strands, particularly for students in the early childhood, SLD, and ABA based.
 - **Early Childhood.** 193 students
 - **SLD.** 721 students
 - **Emotional impairment.** 225 students
 - **ABA Based.** 388 students
 - **Mild Intellectual Impairment.** 44 students
 - **Moderate Intellectual Impairment.** 28 students
 - **Second,** target attention on the substantially separate strands identified for early childhood (129 students), SLD (749 students), ABA based (1,031), emotional impairment (441), and mild intellectual impairment (363).
 - Increased Early Childhood services for entering 3- and 4-year-old students with autism and/or having ABA-based identified needs. Immediately, establish a menu of multidisciplinary resources for Early Childhood to maximize IEP teams decisions based in this setting and reduce the need to “find more schools to host ABA-based classrooms.” Establish and have IEP teams use an IEP development protocol to guide this process.
 - **Elimination of codes used to drive special education placement.** Instead, make it clear that placement decisions are based on regular/bilingual class instruction with removal based on IEP requirements.
 - **Substantially reduced reliance on dual/triple licensure.** The BTU/BPS MOU establishes that such licensure will not be considered as a sole service delivery
-

- model and at least two educators *should* be considered first to implement student IEPs and ESL services. Collect data for teachers of regular classes, and strands for full inclusion and substantially separate classes to analyze the number of teachers working as a general educator or special educator, or both, to understand the extent of this problem. (Note: when calculating student to special educator ratios, data showed BPS had the second smallest ratios (i.e., number of students to one teacher) based on the collection of Council SST collection of district data.)
- **Increased opportunities for students transitioning from strand placement to choice-based enrollment.** Determine if the associated BTU/BPS MOU provision limits SwD transitioning enrollment in choice-based schools when it results in classroom sizes above new class size maxima. If so, (See Section 7, which addresses schools with disproportionately high SwD enrollment based in part on school choice enrollment limits.)
 - **Increased scheduled planning time** for general, special, and ESL educators to coordinate instruction.
 - **Redesigned Special Education Weighted Student Formula (WSF).** Through Reimagine Funding, redesign the weighted student funding formula for special education and base it on ranges of IEP minutes.
 - Use knowledgeable OSE personnel, and a diverse group of representative principals, and COSEs to work with Budget office staff to develop a draft formula. Consider Council SST report comments under the heading, “FY23 Budget Collaborative and Probable Organization guidance (Dec. 10, 2021), and any considerations for associated weighted school formula allocations.
 - Apply the draft to various special education instructional models based on different minute ranges for representative schools to determine how general/special educators and paraprofessionals can be funded.
 - Consider ways to incentivize funding to support the transition of various student groups currently receiving education in full inclusion/substantially separate strands to regular classes with supplemental special educator and paraprofessional supports.
 - Once the draft formula has been fully vetted and applied to a multitude of different scenarios, identify autonomous decisions versus exceptions that require OSE approval. Allow for the front loading of special education resource teachers with anticipated growth of caseloads during the year.

- Establish a **written expectation** that funding allocations approved through probable org and with final budget expenditure are implemented as intended and not used for other purposes. Have OSE collaborate with School Superintendents to monitor implementation and intervene as necessary.
- **Budget for Inclusive School Implementation.** Establish budget parameters for Inclusion Planning Team consideration.
- **Promote Family Engagement. Hire a multilingual consultant with experience engaging families of SwDs. Use the consultant to facilitate greater district capacity to interact with parents/guardians, address their urgent concerns, and develop training opportunities. Develop an electronic system to document parent complaints, steps taken to resolve them, and final resolution with dates. Also see “Family Engagement and Children with Disabilities resource guide for educators and parents.”⁸³**

Time frame: **Complete by beginning of SY2023-24.**

c. Written Procedures, Expectations for Practice, and Available Resources.

Create a digital location, such as the BPS website, to post procedures and expected practices to promote inclusive instruction and address the complex and long-standing factors associated with BPS’s segregation of SwDs, particularly male students of color, and English learners in particular strands. By subject areas, link clear descriptions of procedures, expected practices, and resources. Clearly differentiate between non-negotiables and suggestions. Include BPS’s reconfiguration of special education, models that will be supported, and how the principles described above in 6a (as well as others) will be operationalized. In addition, include links to resources available to teachers and to publicly available website resources, including videos. To the greatest extent, include graphic prompts, such as flowcharts and screen shots. There could be sections outlined for different staff members for greater ease of access.

Minimally, include information that addresses the following:

- **Protocol for IEP Development.** Establish protocol for such activities as –
 - Describing each area of a student’s present levels of academic achievement/functional performance and how the disability impacts involvement/progress in the core curriculum (or for preschoolers impacts participation in various activities).
 - For each area identified, establishing a measurable and meaningful annual goal that is accompanied by a statement of the SDI/related services (RS) and SAS based on peer-reviewed research (to the extent practicable),⁸⁴ and enable the student to a)

⁸³ Retrieved from

<https://ctserc.org/component/k2/item/232-family-engagement-and-children-with-disabilities-a-resource-for-educators>.

⁸⁴ The Council SST notes that evidence-based SDI/RS is grown significantly. See, for example, the federally funded IRIS Center housed at Vanderbilt Peabody College is dedicated to improving educational outcomes for all students, especially those with disabilities birth through age 21, through the use of effective evidence-based practices and

- meet the annual goal and b) be educated/participate with students with/without IEPs.
- For each goal and statement of SDI/RS, producing conscious documentation of minutes for consultation/direct services and the location of services (inside or outside regular/bilingual classes). Have the protocol establish clear criteria for minutes and location considerations that discard unnecessary amounts of SDI and removal outside of regular/bilingual classes. For ELSwD include English language acquisition instruction based on information produced through Recommendation 5.
 - Making placement decisions based on the total of SDI/RS minutes and their location with guidance for resource, separate class, or special school. Use a decision-tree protocol that supports decision-making.
 - Describing the types of IEP-associated support for teachers.
 - Having the OSE Assistant Director serve as the LEA representative for specific types of IEP meetings, such as those anticipated to result in restrictive placements, such as an initial substantially separate placement with questions about appropriateness, special school placement for students with emotional impairments, need for an out-of-district placement, etc.
 - **Instructional Support. Post instructional resources, such as addressing students with low reading and math achievement, with relevant links to Equitable Literacy, and the use of rules-based reading instruction for all students, including SwDs and ELSwD with low reading performance.**
 - **Curricular Material Selection/Use. Describe expectations for the considerations of core curricular materials for SwDs who participate in the MCAS and are expected to receive aligned instruction.**
 - **Related EdPlan Considerations. To the extent reasonable, review EdPlan's configuration and modify it as needed to align IEP development and support decision-making consistent with the above. In addition –**
 - Review the procedure for sequencing the IEP development process to align with the above protocol for IEP development and a visible field showing the total percentage of time a student will receive instruction in a regular/bilingual classroom.
 - Modify EdPlan to support partial inclusion documentation.
 - Review the EL Task Force subcommittee on ELSwD suggestions for contents of a dropdown menu that addresses various items relevant to ELs eligibility for and receipt of special education and incorporate those helpful to improve the IEP and communicate information to teachers and families.

interventions. Retrieved from <https://iris.peabody.vanderbilt.edu/>. The those for mathematics, retrieved from https://doe.virginia.gov/special_ed/disabilities/learning_disability/swd-mathematics-resources.pdf

- **Family Friendly Inclusion Information.** Adapt written information that explains and provides expectations for principles of inclusion for families and post the information (using common native languages) in a visible location on the BPS website. Involve representatives of groups, such as SPEDPAC, that support families of children with disabilities to help inform the type of information to be adapted. Have the representatives review draft contents for their readability and clarity. Link to videos (also using common native languages) to communicate such information orally. Consider using family voice as part of these videos.
- **Inclusion Working Group.** Describe the Inclusion Working Group referenced in the BTU/BPS MOU, including participants and processes for teachers to bring issues to their attention and for addressing them. Establish internal time frames for processes so that school-based issues do not linger and delay planning and implementation.
- **Time frame: By beginning of SY2023-24.**

e. Differentiated Professional Learning and Parent/Family Training.

Embed in the professional learning curriculum addressed in Recommendation 1e training necessary to support implementation of expectations/guidance for the implementation of a unified service delivery system for all students with/without disabilities. Prepare for the implementation of phased-in school-based planning/implementation by providing differentiated training for **SY2022-23**. Base this training on –

- **An inventory of learning needs for all central, region, and school-based personnel with direct/indirect responsibility for teaching/learning.**
- **A schedule of learning, such as annual and/or multiple times each semester.**
- **Learning needs of new teachers.**
- **Cohorts of personnel with similar learning needs.**
- **Use of case scenarios, including best practices for engaging families and parents**
- **Develop/implement a curriculum, which includes case studies and role playing, to give COSEs the information they need to facilitate IEP meetings, act as the District Representative, engage meaningfully with families, etc., with a high level of performance.**

e. Key Performance Indicators

See Recommendation 4a for the development of KPIs for federal reporting categories. In addition, develop KPIs for full inclusion strands, and special school placement by type (as well as inside/outside BPS) to measure placement status over time against established targets. In addition, establish a KPI to measure on-time bus arrival rates and uncovered routes for SwDs. Based on information available, disaggregate KPIs to measure this data by SWD groups most impacted by these issues.

f. Accountability

Establish accountability mechanisms and systems to ensure equitable access to high quality professional development across the district for the implementation of expected practices developed under Recommendation 6.

- **Professional Learning.** Identify professional learning requirements necessary to establish common language and understanding across all BPS schools about the meaning of a unified service delivery system for special education and the meaning of inclusive instruction. Identify also central, region, and school-based personnel having direct/indirect involvement with teaching/learning expected to participate in professional learning activities.
- **Job Descriptions.** Have job descriptions of school superintendents and principals/headmasters align with central responsibility for leading the transformation of their schools to become more inclusive.
- **Personnel Evaluations.** To the maximum extent appropriate, have personnel evaluations for individuals with direct/indirect responsibilities for teaching/supporting school-based instruction include measures for the promotion of inclusive instruction, and meaningful opportunities for interactions between students with/without disabilities, and welcoming families as welcomed partners.

g. External Expertise

Expediently engage external experts to provide the level of expertise, experience and bandwidth BPS needs to implement activities associated with Recommendation 6.1 and meet the ambitious time frame for the **beginning of SY2023-24**.

Recommendation 6.2. Phased-in Inclusion Planning and Implementation

To address the complexity of transitioning to inclusive practices and unified system of service delivery upon which inclusive education is founded, a phased in school-based planning and implementation approach is necessary.

The Council SST agrees with Liasidou (2015) who states that this work requires time for planning before systemic changes are implemented. The following overall schedule is recommended for phasing in planning and implementation. More detailed information for each year of planning and implementation is provided further below.

a. Written Guidance Handbook

Include “processes, protocols, and templates, including guidance on class composition and appropriate staffing to school-based inclusion planning teams.” (BTU/BPS MOU)

- **Inclusion Planning Team.** Describe expectations for Inclusion Planning Teams, and their collaboration with Instructional Leadership Teams (ILT).

- **Establish parameters for multidisciplinary participants and leadership.** Describe expected team responsibilities to include, but not be limited to, BTU/BPS MOU components for 1) ongoing maintenance/assessment of inclusive practices, with successes/challenges; 2) solicitation/consideration of stakeholder voices/ experiences, and 3) advice to school leadership on gaps/needs in staffing/other resources. In addition, explicitly state that each team will use BPS principles for inclusive instruction as a foundation for school planning.
- **Staffing Recommendations.** Based on Recommendation 6, describe appropriate staffing for each SDI/RS and SAS model. Have the team annually submit recommendations to school/district teams that review upcoming school year staffing. (BTU/BPS MOU)
- **REPT.** Have the team use the Racial Equity Planning Tool and embed elements of the Inclusion Plan in the Quality School Plan 90-Day Action Plan.
- **Inclusion Planning Team Guidance.** Develop web-based guidance, protocol, and other materials for teams to review as they plan their school's redesign of BPS's configuration of special education. (See Recommendation 6.1.)
 - Include in this guidance: 1) BPS statements of commitment to inclusive instruction, 2) information about a unified service delivery system and its components, 3) redesign of specially designed instruction (SDI) models incorporating Council SST identification of associated principles, 4) family engagement structures, 5) written procedures, expectations for practice, and available resources, 7) curricular material expectations; 8) professional learning considerations, 9) EdPlan modifications, 10) notice of relevant KPIs, and 11) expectations for receipt of/participation in professional learning.
 - Expect all IEP team members to receive professional learning that includes the contents of Recommendation 6c. As appropriate, include information about Culturally and Linguistically Sustaining Practices (CCLSP) that would inform the planning process.
 - Have professional learning about English language acquisition instructional models, including native language instruction, that was produced in association with Recommendation 5 related to ELSwD. Clarify opportunities for training to be job-embedded, including modeling/coaching.
 - Provide guidance for school-based KPI measures.
 - Monthly, have the team report the following to School Site Council/Governing Board: plan contents, ongoing implementation status, outcomes, and any outstanding issues.
- **Self-evaluation and Progress Monitoring Tool.** Develop a tool for schools to use to evaluate their current practices and progress as measured against indicators based on principles described but not limited to those listed in Recommendation 6a and 6c

(redesign of SDI/RS, and promotion of family engagement), and Recommendation 5 practices for the instruction of ELSwD, including native language instruction. Have each school use the tool to inform the development of the inclusion plan.

- **Inclusion Plan Template.** Develop a template that Instructional Planning Teams will be expected to use for inclusive school planning. Include components for tracking implementation and reporting to School Site Council/Governing Board the status of planning, implementation, and progress aligned with inclusive school principles. Have the plan template include:
 - **School data.** Information such as, but not limited to 1) school staff by type, 2) SwD and ELSwD enrollment, 3) special education configuration with number of students in each setting, 4) any discrepant proportions by race/ethnicity, ELSwD, male representation in these areas, etc.
 - **BTU/BPS MOU specified activities.** Incorporate 1) professional development, 2) culture/mindset building, 3) staffing, and 4) communicating structures, relationships, and protocols with school based SST/MTSS systems. and 5) school class composition and staffing needed to carry out proposed SDI delivery.
 - **SDI/RS and SAS delivery.** Review of relevant information to describe proposed models to meet student needs.
 - **Hiring.** Proposed additional staff needed to carry out delivery of SDI/RS and SAS.
 - Professional development activities
 - Key Performance Indicators
- **Plan Approval.** Establish a process by which the principal will present the Inclusion School Plan to a regional team led by the School Superintendent. Describe expected participants for the regional team, minimally including the OSE Assistant Director and for schools with ELSwDs an individual knowledgeable about English language acquisition. Upon plan approval, use the staffing model to inform the next school year’s probable org planning.
- **Monitoring.** Establish a mechanism led by each School Superintendent and the regional team to monthly monitor each school’s planning development and implementation.
 - Establish walkthrough protocol specifically designed to look for high quality inclusive instructional practices.
 - Review the school’s self-monitoring results with external findings.
 - Have the Inclusion Leadership Team use the problem-solving process designed for continuous improvement. Describe the process and provide training for its usage.
 - Time Frame: By the beginning of SY 2023-24

b. Phased-in Inclusive Practices Planning and Unified Service Delivery System Implementation

Phase in planning and implementation using the schedule below.

- **2023-24 School Year**
 - **“Inclusive” Schools.** Identify current schools considered to be “inclusive schools” and have them use the self-evaluation/progress monitoring tool to identify areas for improvement to ensure they are aligned to a unified service delivery system.
 - **All Other Schools.** Plan for SY 2024-25 incoming students: Early Childhood (K0-2), and grades 6 and 9.
- **2024-25 School Year**
 - Implement SY 2023-24 plans for students: Early Childhood (K0-2), and grades 6 and 9.
 - Plan for SY 2025-26 incoming students: grades 3, 7, 8, and 10.
- **2025-26 School Year**
 - Implement SY 2024-25 plans for students: grades 3, 7, 8, and 10.
 - Plan for SY 2026-27 incoming students: grades 4, 5, 11, and 12.
- **2026-27 School Year**
 - Implement SY 2025-26 plans for students in grades 4, 5, 11, and 12
- **During Planning Years:**
 - Convene IEP team meetings for students entering identified grades the following school year.
 - For IEPs designating a less restrictive resource model for the next SY, facilitate 2024-25 school choice assignments, enrollments, and share information about the students with receiving schools.
 - Provide professional development and capacity building to schools and staff both district wide and schools phasing in inclusive practices and unified service delivery system.
 - Prepare OSE, and other relevant departments, on the BPS unified service delivery system and determine the need for developing or updating district procedures, protocols, and communication mechanisms.
 - Engage in WSF and probable org impact planning for the following SY

Exhibit 6.2.A. Inclusive Practices and Unified System of Service Delivery

	2023-24	2024-25	2025-26	2026-27
Plan For	<u>2024-25</u>	<u>2025-26</u>	<u>2026-27</u>	

	2023-24	2024-25	2025-26	2026-27
	Incoming EC (K0-2), Grades 6 & 9	Incoming Grades 3,7, 8 & 10	Incoming Grades 4, 5, 11 & 12	
Professional Development	X	X	X	X
WSF/Probable Org Planning	X	X	X	
Per IEP resource model- School Choice & Enrollment	X	X	X	
Implement Plan		EC (K0-2), Grades 6 & 9	Grades 3, 7, 8 & 10	Grades 4, 5, 11 & 12
Monitor, problem-solve, course correct		X	X	X

g. External Expertise

To support implementation of Recommendation 6.2, engage experts to support OSE and Inclusive Office staff assisting the school-based planning process. Use this expertise to provide the staff with professional development and ongoing experienced technical assistance.

Recommendation 6.3. McKinley Schools and ODU School Attention

Ensure students with emotional impairments educated in separate schools inside/outside BPS are educationally justified and free from racial/ethnic bias, and support expedited McKinley Working Group activities.

a. IEP Review

Immediately engage external expert(s) having extensive experience with regular schools that have successful outcomes for students, including those with significant emotional impairments.

- **Sample IEPs.** Have the external partners sample representative IEPs for students at the four McKinley Schools and various ODU schools for students with emotional impairments to gain an understanding of their contents, and how they justify separate school placement decisions. Also, determine the extent to which IEP-based information informs placement decisions at McKinley or an ODU school. Supplement this information with expert conversations with BPS individuals who have underlying knowledge about these decisions and the extent to which they exhibit racial/gender bias.
- **Immediate Follow-Up Action.** Based on the cumulative knowledge gained from the IEP review and conversations, have the external partners collaborate with OSE to develop immediate follow-up actions necessary to address any outstanding placement issues identified.

- **New IEP Team Meetings.** In collaboration with OSE and, for McKinley students with McKinley leadership, identify any students with IEPs that do not justify school placement and reasons for this belief. Based on these conversations, schedule new IEP team meetings to take updated student into consideration and develop new IEPs with justified placement decisions that may result less restrictive educational settings. Have the external experts collaborate with OSE to provide professional development at schools in which the students will be newly educated.
- **Authentic Parent Engagement.** During this process, engage with families to share information about the intent of the process, and support them through the IEP and any subsequent child transfer to a new school. Ensure that individuals speak with family members in their preferred native language and engage them in conversation to elicit their feedback and answer their questions.
- **Implement Lessons Learned from the IEP Review.** Based on lessons learned from the IEP review and IEP team meeting outcomes, collaborate with the external partners to –
 - **Procedures.** Revise procedures that include but are not limited to 1) separate school placement protocol, 2) decision-tree for BPS versus ODU schools that addresses racial/ethnic bias, and 3) process for IEPs to include a hybrid McKinley/regular school placement.
 - **Training.** Identify/execute systemwide and McKinley professional development needs.
 - **Temporary Placement.** Eliminate the temporary McKinley placement absent justification for the process.

b. External Expert Support for McKinley Working Group

Have the external partners meet with the group to determine how the partners can help expedite the implementation of changes associated with the working group's five focus areas of improvement. Engage McKinley student voice as part of this process. Based on these discussions, specify actions with associated time frames and responsible persons.

c. KPIs.

Use lessons learned from the above actions to inform the development of KPIs associated with special schools (inside/outside BPS). Coordinate with Recommendation 6e.

Time Frame: **Beginning of the 2023-24 School Year**

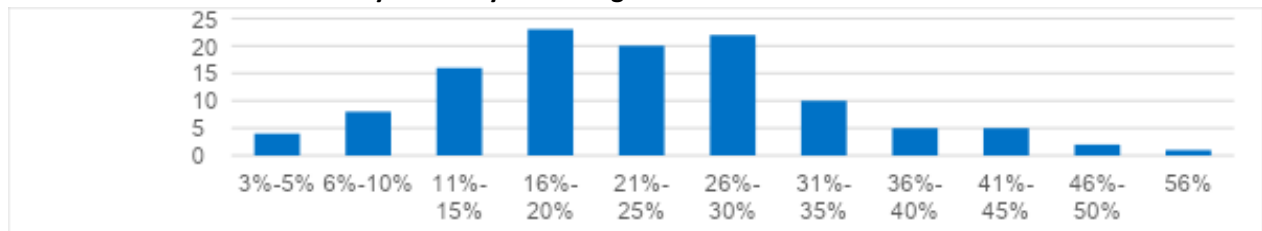
7. High Proportion of Students with Disabilities in a Small Number of Schools

As previously mentioned, a relatively small number of BPS schools enroll the largest percentages of students with IEPs. Information in this section presents data that shows the parameters of this problem, and district-driven enrollment and placement rules that have contributed to 35 percent of students with disabilities learning in separate classes and schools.

Parameters of the Problem

Exhibit 7a, which shows school numbers by disability prevalence ranges, shows 23 (20 percent) of 116 schools⁸⁵ have disability enrollments of 31 to 56 percent, and 30 percent of all BPS students with IEPs. Twelve schools (10%) each enroll less than 10 percent rate and four have rates between 3 percent and 6 percent. While three of these are “exam” schools, the fourth is the International School with a Newcomer Academy for newly U.S. arrived students having little or no schooling in their home country or whose education has been interrupted. In July 2021 BPS changed its criteria for exam schools.⁸⁶ While this policy was intended to diversify the student body, the criteria does not address students with IEPs. In Chicago Public Schools (CPS), which has a selection process upon which BPS’s was adopted,⁸⁷ various “exam schools” have space reserved for placed students with significant disabilities, such as deaf impairments, autism, or intellectual impairments, and who have opportunities to interact with their nondisabled peers. These students have characteristics such as those in BPS’s substantially separate strands.

Exhibit 7a. Number of Schools by Disability Rate Ranges⁸⁸



Number of Schools by Grade Level/Alternative and by Disability Rate Ranges

Considering BPS schools by grade level and type, overall disability rates vary considerably with highest rates for the five alternative schools (35 percent) and two middle schools (32 percent),

⁸⁵ These schools do not include special district schools enrolling only students with IEPs and students placed in out-of-district (OOD) schools.

⁸⁶ In July 2021, the exam school selection process was changed with an intent to diversify the student body. The new policy permits application with a “B” GPA and a rank that combines grades and exam score. Additional points are added for students living in public housing, who are homeless, in DCF care, or attend school with at least 40 percent of families are “economically disadvantaged.” Also, eight neighborhoods are ranked by various factors, e.g., family income, language other than English, private homes, etc. BPS adopted from the system that Chicago uses for admission to its exam schools.

⁸⁷ Retrieved from <https://universalhub.com/2021/school-committee-approves-historic-changes-exam>.

⁸⁸ Current school and grade levels as of August 2022.

followed by high schools at 29 percent. The 14 middle/high schools had the lowest rate of 16 percent. Three schools, which comprise BPS’s schools with exam related criteria, have an overall very low rate of 4.1 percent. Exhibit 4b shows how these rates are influenced by the number of schools in each group with disability rates above 30 percent. (See Exhibit 7b.)

Exhibit 7b. By Grade Level All SwD Rates and Number of Schools by Ranges of Disability Rate⁸⁹

	All SwD	3-5 %	6-10%	11-15 %	16-20 %	21-25 %	26-30 %	31-35 %	36-40 %	41-45 %	46-50 %	56%
Early Ed (7)	20%	1			3	2		1				
Elem (41)	19%		6	12	5	6	7	2	1	2		
El/Mid (32)	22%		1	4	8	7	7	3	1	1		
Middle (2) ⁹⁰	32%							2			1	
Mid/HS (14)	16% ⁹¹	2	1		3	2	3	3				
HS (11)	29%		1		2	2	1		1	2	1	1
Alternative (5)	35%				1	2			1	1		

Pilot Schools

Pilot Schools have autonomy over budget, staffing, governance/school policies, curriculum/assessment, and the school calendar to provide increased flexibility to organize schools and staffing to meet the needs of students and families. The 19 (16 percent) Pilot Schools have an overall disability rate of 23 percent and range from 16 percent to 42 percent. Six (32 percent) have a rate of 26 percent or above, with an overall rate of 31 percent. (See Exhibit 7c.)

Exhibit 7c. Pilot School Disability Rates and Number of Schools by Disability Ranges

	All SwD	Pilot SwD	16-20%	21-25%	26-30%	31-35%	36-40%	41-45%
Early Ed (2)	20%	19%	1	1				
Elem (1)	19%	29%			1			
El/Mid (6)	22%	22%	2	3		1		
Middle (1)	32%	33%				1		
Mid/HS (4)	16%	22%	2	1	1			
HS (5)	29%	26%	2	1		1		1

Innovation Schools

Underperforming schools may apply to DESE to become an innovation school, which brings new leadership, autonomy, and flexibility. The 5 (4 percent) Innovation Schools have an overall

⁸⁹ Henderson, with a 25.7 percent rate, enrolls all grades and is not shown in the chart.

⁹⁰ Two middle schools are excluded because they were closed in 2022-23; together their disability rate was 38%.

⁹¹ Pilot schools have autonomy over budget, staffing, governance/school policies, curriculum/assessment, and the school calendar to provide increased flexibility to organize schools and staffing to meet the needs of students and families.

disability rate of 18 percent and range from 13 percent to 30 percent. 16 percent to 42 percent. Three of the schools have rates ranging from 13 percent to 17 percent while the other two have rates ranging from 26 percent to 30 percent. (See Exhibit 7e.)

Exhibit 7e. Innovation School Disability Rates and Number of Schools by Disability Ranges

	All SwD	Innovation SwD	11-15%	16-20%	21-25%	26-30%
Elem (2)	19%	20%	1			1
El/Mid (1)	34%	17%		1		
HS (1)	16%	13%	1			
All (1)	26%	26%				1

Transformation Schools

In 2019 BPS received State authority to intervene in the lowest-performing schools by changing staff, increasing class time, and adding new supports for students. Overall, BPS’s 29 (25 percent) Transformation Schools have a disability rate of 27.3 percent. Exhibit 7f shows for each grade level the number of schools by disability rate ranks. Twenty one schools (72 percent) have a rate of 26 percent or above, with an overall rate of 33 percent. Further, 10 (35 percent) schools have rates above 31 percent, with an overall rate of 37 percent. Five schools (17 percent) have an overall rate of only 11 percent. Six of the schools are also pilot schools.

Exhibit 7f. Transformation School Disability Rates and Number of Schools by Disability Ranges

	All SwD	Transformation SwD	6-10 %	11-15 %	16-20 %	21-25 %	26-30 %	31-35 %	36-40 %	41-45 %	46-50 %
Elem (8)	19%	20%*	3	1			2	1	1		
El/Mid (11)	22%	26%		1	2	3	2	1	1	1	
Mid (1)	32%	33%						1			
Mid/HS (5)	16%	27%			1		3	1			
HS (4)	29%	38%					1		1	1	1

Transition Schools with Substantially Separate Strands

BPS provided the number of substantially separate strand classes for the 22 Transformation Schools at the elementary, elementary/middle, and middle levels. Of these schools, 16 had classes for one or more strand. Data was not available for secondary schools because “high school programming is more fluid.” Exhibit 7g shows each Transformation School by disability rate, number of classrooms for each strand, and the total number of 110 classrooms. These schools had an overall 25 percent disability rate, with rates ranging from 8.7 percent to 44.6 percent. The number of classes ranged from 3 to 18. Lee K-8 School had the high 44.6 percent rate and the most (18) substantially separate classrooms.

Exhibit 7g. Number of EL, EL/Mid, and Middle Transition School Substantially Separate Strands by School

		SwD %	ABA	SLD	Emo - EX	EC Center	Mild Intel	Mod Intel	Sev Intel	Mult Dis	TOTAL
Elementary	Ellis	8.7%			4						4
	Mather	12.0%		4							4
	Chittick	37.1%	6								6
EL/Mid	Umana	13.2%	3					3			6
	Orchard Gar	19.1%	8								8
	Greenwood	19.8%		1	3						4
	Young Achievers	22.3%			3						3
	Hennigan	24.4%	3	5							8
	Edison	24.9%			6						6
	King	29.0%	6	3							9
	Curley	29.6%	9					6			15
	Condon	31.1%		5		3			4		12
	Lee	44.6%	18								18
	Middle	Frederick	33.2%		3				2		2
		25%	53	21	16	3	6	5	4	2	110

Six Transition Schools (5 elementary and 1 elementary/middle) had zero substantially separate classes, with an overall disability rate of 25.1 percent.

Exhibit 7h. EL and EL/Mid Transition Schools with No Substantially Separate Strands

Elementary	Grew	6.9%
	Philbrick	10.1%
	Blackstone	27.5%
	Mason	28.5%
	Clap	35.0%
Elementary/Middle	Higginson-Lewis	37.2%
Overall Rate		25.1%

Secondary Transition Schools with Substantially Separate Strands

Although the Council SST was not given the number of substantially separate strand classrooms for secondary Transition Schools, the Special Education Schools and Strands for SY22-23 included secondary schools in its chart of strands by schools. The Council SST used this chart to denote which Transition secondary schools hosted a strand. As shown in Exhibit 7i, except for the Mary Lyon school, which is fully inclusive for students with emotional impairments, each school has at least one strand. Overall, the number of strands range from one to five, with a total of 20. Without the number of classrooms by strand, however, it is difficult to judge how the presence of these strands impact the school.

Exhibit 7i. Presence of Substantially Separate Strand by Transformation Secondary School

		SwD Rate	ABA	SLD	Emotional External	Mild Intel	Mod Intel	Multiple Disability	Emotiona I	Total
Mid /HS	TechBoston	26.2 %			x					1
	English	26.3 %						x		1
	Brighton	28.9 %		x	x	x	x			4
	Charlestown	31.6 %	x	x		x	x	x		5
	Excel	27.8 %		x	x	x				3
HS	Madison	39.7 %		x	x	x	x		x	5
	Community Academy	42.6 %			x					1
	Mary Lyon	48.1 %								0
Total		31.3 %	1	4	5	4	3	2	1	20

District-driven Enrollment and Placement Rules

BPS representatives shared with the Council SST that it has had various systemic barriers to establishing equitable access to quality education. One barrier mentioned was the district’s school assignment system that concentrates high levels of student need in a fraction of the district’s schools. Currently, there are no systems in place to address overrepresentation and assignment to full inclusion and substantially separate settings to certain schools specifically for certain populations. Another important barrier is the district’s home-based assignment practices that influences low performing schools to have the space to house inclusion classrooms and substantially separate classrooms.

Home-based Assignment Practices

As a context for understanding this issue, under BPS’s “open enrollment” home-based assignment practices (HBAP) parents have school choice options based on a list prioritizing quality and proximity to the family residence. Options are limited to the two closest Tier 1 (highest-quality) schools, the next four closest Tier 1/Tier 2 schools, and then the next six closest Tier 1, 2, or 3 schools. Options then include schools within a mile radius of the

residence, schools with special programs, schools siblings attend, and schools referred to as "capacity" schools. These are larger, close to home schools, and often Tier 4 schools.⁹²

In response to BPS's 2019 request to conduct an independent evaluation of these practices, the Boston Areas Research Initiative made several important findings. In relevant part, the researchers found BPS's HBAP did not increase equitable access to high-quality schools and instead exacerbated existing inequities. Blacks, Latinxs, and those living in predominantly low-income, ethnic minority neighborhoods had fewer high-quality schools from which to choose, compared to whites, Asian Americans, and those living in wealthier neighborhoods. Furthermore, the high-quality schools available to them tended to be smaller in size with fewer seats available, creating greater enrollment competition for many students already disadvantaged in other ways. According to the researchers, the underlying problem is that equitable access to high quality schools will not progress much when too few high-quality schools exist in the neighborhoods that need them. "Rearranging school assignments without increasing the number of high-quality schools merely rearranges who has access to high-quality schools and who is left out."

Furthermore, as DESE's 2022 report also found, choices are restricted when a student's IEP changes to reflect a less restrictive setting (from either an inclusion or substantially separate placement). In such cases, the student's new placement is dependent on "seat" availability in the school of choice. Depending on choices available, families sometimes choose to leave students in their more restrictive placements or services may be interrupted/delayed services until OSE finds schools with available seats.

Parthenon Report

The May 2018 Parthenon report addressed the district's open enrollment process and how it impacted the vast majority of off-track students.⁹³ (Parthenon Report). At that time, the vast majority of off-track students attended open enrollment schools. Black and Latinx students were significantly more likely to be enrolled in open enrollment schools, while the majority of white and Asian students were enrolled in exam and selective schools. Open enrollment schools were found to enroll 53 percent of all students but close to 80 percent of students with some type of differentiated need, including those in substantially separate classrooms, ELs, students with 8th grade early warning indicators, and over-age students. Also, 95 percent of students with late lottery or mid-year entry who are assigned to open enrollment schools are 3 times as likely to have poor risk factors than 1st round choice lottery. In "low concentration" schools the

⁹² "Good Schools Close to Home" How Boston's bold attempt to increase equity and reduce student travel time by giving families smarter options didn't quite work – but it could. Ed.Harvard Ed. Magazine, Nancy Hill and Daniel O'Brien, BPS invited the Boston Area Research Initiative to conduct an independent evaluation of BPS's home-based assignment practices (Winter 2019), retrieved from <https://www.gse.harvard.edu/news/ed/19/01/good-schools-close-home#:~:text=In%20Boston%2C%20the%20district%E2%80%99s%20original%20controlled%20choice%20policy%2C,that%20was%20within%20a%20mile%20of%20their%20home.>

⁹³ "Excellence and Equity for All: Unlocking opportunities for off-track youth in Boston Public Schools," retrieved from <https://www.bostonpublicschools.org/offtrackyouthreport>.

expected graduation rate of 85% is much higher than “high concentration” schools where graduation odds drop to 52%.

DESE’s 2020 DESE report reinforced the Parthenon Report findings, adding that three to five special education program strands were located in open-enrollment high schools while fewer were in application schools. Further, 9 lowest performing high schools, all with open enrollment, house 45 percent of all program strands. Schools hosting these strands were largely those with space. It is unsurprising that district/school leaders reported how the high concentration of strands in open enrollment schools created a disproportionate level of challenge and negatively affected the ability to serve all students effectively. As the above data showed, Transformation Schools particularly house a disproportionately large number of substantially separate classrooms, and a larger proportion of students to support. As DESE reported and the Council SST’s review reinforced, these issues continue with no plans underway for improvement.

In 2022 DESE reported that BPS’s special education placement inequities have continued and how open enrollment schools (compared to schools with an application process) are disproportionately impacted. DESE wrote that schools with higher achievement have consistently high enrollment and the remaining schools are filled with special education strands, and students late to the open enrollment selection process. As discussed above, the Parthenon report first addressed these circumstances in 2018.

According to BPS representatives, the home-based model of school choice was intended to give students, including those with disabilities, a group of schools based on an established cluster. When the home-based assignment plan was introduced, the clusters were a way of ensuring that a student with an IEP identifying program strand would receive a placement close to home. However, students are often assigned to a neighboring cluster, or a regional school established for a subset of clusters. We also note that clusters are not aligned with the regions and the superintendents to whom principals report. This circumstance prevents the superintendents from working with their principal group to address all students, including those with disabilities, who reside within their region to collectively strategize and plan for equitable enrollment, more inclusive instruction, and improved teaching/learning.

Family Involvement

One of the most effective means of ensuring academic success is to engage families in their children’s education. While family engagement confers benefits to all students, those with disabilities often require a greater degree of parental involvement and advocacy than their peers without disabilities to be assured of receiving the same level of instruction as the general student population. Children with disabilities often face multifaceted classroom challenges requiring special attention from instructors and active engagement from their families. Their families play a number of supporting roles, including being advocates and providing valuable insight into their specific needs to instructors, who may at times feel pressed by trying to meet the needs of diverse groups of students. There are rarely

any simple answers to balancing the needs of each individual child with disabilities with others' needs, with competing structural, bureaucratic, pedagogical, and emotional factors often adding extra layers of effort and complexity for everyone involved. But when families and educators work together as partners, it enhances the likelihood that children with disabilities will have positive and successful learning experiences.⁹⁴

BPS's family engagement practice team works with family liaisons in every school. The goal is to build capacity within schools to be a resource for families, including those with children receiving special education. In the experience of family members with whom the Council SST spoke, family engagement is often an afterthought, and their feedback is not taken seriously or with respect. One example was the miscommunication regarding our meeting, which delayed its starting time.

Interviewees asked for more training on issues of importance to families, and for childcare so more family members could attend. They also believe there is a need for more communication between the school and home, which could be addressed through a daily communication tool. Periodically this information could share how children are progressing, and more frequently report positive highlights about the day or issues that need follow up attention.

The OMME strategic plan included several items relevant to families of MLWDs that are relevant also to all SwDs. For example, action step 2.1.i specifies the creation of a district process for multilingual families to report concerns or equitable access to opportunities for MLWDs in their native language; and capture data on issues to report to Superintendent, SPEDPAC and EL Taskforce ELSWD Subcommittee. Also, area 5 concerns partnership with youth, families, and others to increase opportunities for program options towards college/career readiness. Although not referenced, various action steps are relevant to SwDs, including ELSWD, such as –

- Identify ML student and family needs to better coordinate resources/services across BPS and the city (social/emotional, trauma, and mental health support)
- Disaggregate monthly MTSS chronic absenteeism data and provide coordinated outreach to students/families. (annually beginning November and each month thereafter)

Recommendation 7. Reduce High Proportion of SwD in Small Number of Schools

Have the School Committee and Superintendent commit and act to reduce the high proportion of SwDs in a small number of schools and transition to having equitable enrollment proportions of SwDs who receive the education/supports necessary to meet their needs.

⁹⁴ Family Engagement and Children with Disabilities: A Resource Guide for Educators and Parents, Harvard Family Research Project, retrieved from <https://ctserc.org/documents/resources/Family%20Engagement%20and%20Children%20With%20Disabilities%20A%20Resource%20for%20Educators.pdf>.

a. Establish Expectations

Have the School Committee establish policy and the Superintendent issue a Circular expressing the commitment to reduce the disproportionately high enrollment of SwDs in a relatively small number of schools and low performing schools.

b. Actions

With expert partners having successful experience changing the conditions that have led to BPS's current circumstances –

- **Enrollment/Placement Rules.** Examine and change district-driven choice/selective enrollment and special education placement rules that contribute to students' inequitable access to quality education in low performing schools, which include both students with/without disabilities, and English learners with/without disabilities. As DESE wrote in its 2022 report, "Until district leadership and the school committee advance a more equitable school choice and assignment system, the district will have limited success in improving outcomes and opportunities for historically marginalized students."
- **Weighted School Funding.** For schools, especially for those with low achievement of all students and particularly for SwDs, review/change the WSF formula so it is sufficiently robust to fund evidence-based "intensive and specialized supports and resources that appropriately address the individual needs of each school." (DESE 2022 report) Also, identify central office supports available to provide sufficient school-embedded professional development. Use expert partners to collaborate with BPS personnel who have knowledge about current school resources to identify critical gaps. If necessary, quickly survey these resources to inform this process.⁹⁵

Reserve Space in highly selective schools with a disproportionately low proportion of SwD to house at least one substantially separate classroom strand. The Chicago Public Schools has used this strategy to expand opportunities for both students with/without disabilities to interact in supportive ways.⁹⁶

- **Family Engagement Collaboration.** Have the Deputy of Family Engagement meet regularly with personnel involved with family engagement in other offices, departments,

⁹⁵ As stated in the DESE 2022 report, there is a need to develop/implement high-quality targeted improvement plans and accountability for results.

⁹⁶ For example, see one of Chicago Public Schools' highly selective schools [Young HS (Walter Payton)] that includes in their enrollment students educated in separate classes with instruction based on significantly modified alternate achievement standards, retrieved from <https://www.cps.edu/search/?pageNumber=1&context=Schools&selectedTerms=%7B%22id%22%3A-333966656%2C%22fieldName%22%3A%22Facets.PrimaryCategoryFullName%22%2C%22term%22%3A%22High%20School%22%7D&selectedTerms=%7B%22id%22%3A483042313%2C%22fieldName%22%3A%22Facets.ProgramNames%22%2C%22term%22%3A%22Significantly%20Modified%20Curriculum%20w%2F%20Moderate%20Supports%22%7D&selectedTerms=%7B%22id%22%3A962967345%2C%22fieldName%22%3A%22Facets.ProgramNames%22%2C%22term%22%3A%22Significantly%20Modified%20Curriculum%20w%2F%20Intensive%20Supports%22%7D&sortId=z-a>

etc. to address common issues, and how they could leverage their collective resources to support families.

b. Written Expectations and Professional Development

As these activities are conducted, identify issues that require written procedures or expectations for practice. Have this information included in existing or new operating procedure manuals. At the same time, identify areas requiring training to communicate new expectations and strategies for implementation at the district, regional, and school levels.

c. Key Performance Indicators

Working with the expert partner establish KPIs to benchmark current enrollment rates, establish targets for, and measure enrollment changes. To the maximum extent appropriate, disaggregate data for SwDs by –

- **Type of School:** traditional, innovation, pilot, transformation, selective enrollment, and application schools.
- **Other Indicators,** such as ELs, race/ethnicity, gender and economic disadvantage.
- **Instructional Model.** Also monitor SwDs educational setting by resource and strand (full inclusion and substantially separate class.)
 - **Time Frame:** **Beginning of the 2023-24 School Year**

8. Interdepartmental Collaboration and OSE Organization

BPS, like other school districts, has a significant amount of human and material resources that directly or indirectly support school leaders/ILTs, and classroom-based personnel, which are spread through different offices, departments, and organizational units. Because these resources are segmented, often by different funding sources, intentional collaboration is needed to avoid fragmentation, different and sometimes conflicting directives, separate professional development, and ultimately a dilution of school support. An “all hands on deck” approach is necessary to address the achievement and social/emotional wellbeing of all students, including those with disabilities, English learners, and ELs with disabilities, effectively. For example, with large recruitment needs to fill vacant positions, recruitment teams that report to another department reportedly do not include OSE personnel who could support this effort.

BPS’s administration has been described as having scant up-down and side-to-side communication, with a historical culture of silos and autonomy. It appears that this practice has begun to change with the district’s new leadership, as interviewees referred to more collaborative meetings and professional development. For example, the Assistive Superintendent for Inclusion described the involvement of individuals from across the BPS spectrum to help envision an approach for moving toward a more inclusive system of instruction for students with disabilities, including ELSwD. The Council SST was initially concerned that there was a second group of inclusion specialists working within OSE, and that these two structures would be fragmented and working at cross purposes. Instead, it appears that their roles are differentiated, with the Assistant Superintendent’s team working on broad aspects of school structure and models and the OSE team interfacing with teachers to support instruction. Also, both groups appear to be working collaboratively where activities are complimentary and inform each other’s work.

Social/Emotional and Wellness Supports (SEWell) and Behavioral Health Collaborative

Students with/without disabilities who are beginning to/or have significant challenges associated with positive behavior and social/emotional wellness typically have difficulty learning, and often have teachers who have run out of successful strategies to intervene. When this occurs, teaching/learning is disrupted for both the student and class, and frustration/anxiety increases with poor outcomes. Students are referred for special education evaluations, or identified students are referred to restrictive educational settings in regular schools or public/private day schools.

BPS has three units with a wealth of resources and personnel having a high level of expertise in this area: OSE’s Behavioral Health Collaborative (BHC), the Office of Social Emotional and Wellness Supports (SEWell), and social workers housed in the Division of Student Support. Although having uncoordinated actions, all of these groups support students’ social/emotional well-being. A BHC PowerPoint refers to the provision of “culturally/ linguistically sustaining

practices [to] meet the needs of ALL BPS students and staff across a continuum of prevention, early interventions, and intensive services.”⁹⁷ Similarly, SEWell’s website indicates how the office addresses “health, SEL, and wellness inequities within schools and provide adequate supports for all students and schools.”⁹⁸ Also, both units use an MTSS approach with tiered supports having common and also different elements.

School-based social workers are separate from both OSE and SELWell and have a minimum 1.0 FTE school allocation.⁹⁹ In addition to its development of community-based partners, BHC relies on its group of psychologists to support the department’s work. BHC reported to the Council SST that the district employs 206 social workers and 103 psychologists, or a total of 309 persons.

In many school districts with which the Council SST has worked, social workers and psychologists (as well as nurses) are grouped together, frequently in an office that houses both special education and these personnel areas. Even when housed together, it takes intention to collaborate. When housed separately, this intention and focus becomes more difficult but is achievable. Neither interviews nor written information addressed how BHC and SEWell work together to marshal and leverage their human and material resources to support students and their teachers and schools with needs common to both units. Moreover, maximum planned collaboration is needed to be prepared to address any intermittent and unexpected school-based crisis that may occur.

Central and School-based Special Education Administration

The special education leadership structure has changed repeatedly over the past several years, resulting in prior agreed-upon plans for improving special education services not in place. Also, OSE has been plagued by vacant positions. Reportedly, at the time of the Council’s SST, a significant number of OSE’s positions were vacant. Including one of the executive director positions and two ELSWD positions. These challenges continue to impede student access to high-quality education, prevent appropriate peer interactions with other students, and ultimately limit students’ preparedness for post-secondary career and educational options. Furthermore, OSE’s organization is not sufficiently comprehensive to effectively support school leaders, ILTs, and school personnel as they strive to improve outcomes for students with disabilities, and ELSwD. This includes expertise in areas such as specific disabilities, alternate curriculum, designing curriculum guidance, and addressing the needs of culturally and linguistically diverse learners. The information below addresses those organizational issues most impacting this condition.

Interim Assistant Superintendent

⁹⁷ OSE Behavioral Health Services PowerPoint (April 4, 2022) provided to the SST.

⁹⁸ Retrieved from <https://www.bostonpublicschools.org/Page/8212>.

⁹⁹ FY23 Budget Guidance

Interviewees reported that the special education leadership structure has changed repeatedly over the past several years, which has had a negative impact on agreed-upon plans and accountability for improving special education services. Reportedly, these circumstances have impeded student access to high-quality education, prevented appropriate peer interactions with other students, and ultimately limited students' preparedness for post-secondary career and educational options.

The most recent OSE organizational chart BPS provided to the Council SST shows the Interim Assistant Superintendent (Lauren Viviani) with two Executive Directors (ED). One Executive Director of Instruction (Kim Crowley) and the other is vacant. Fourteen positions directly report to Viviani: ELSwD (2), Inclusion, Early Childhood, ABA, Transition, Behavior Health, Related Services, Placement, Out-of-District, Compliance, Mediation, Operations, and Transportation. On a positive note, interviewees shared that the Interim Assistant Superintendent Viviani meets weekly with administrative staff, giving them a voice for the first time.

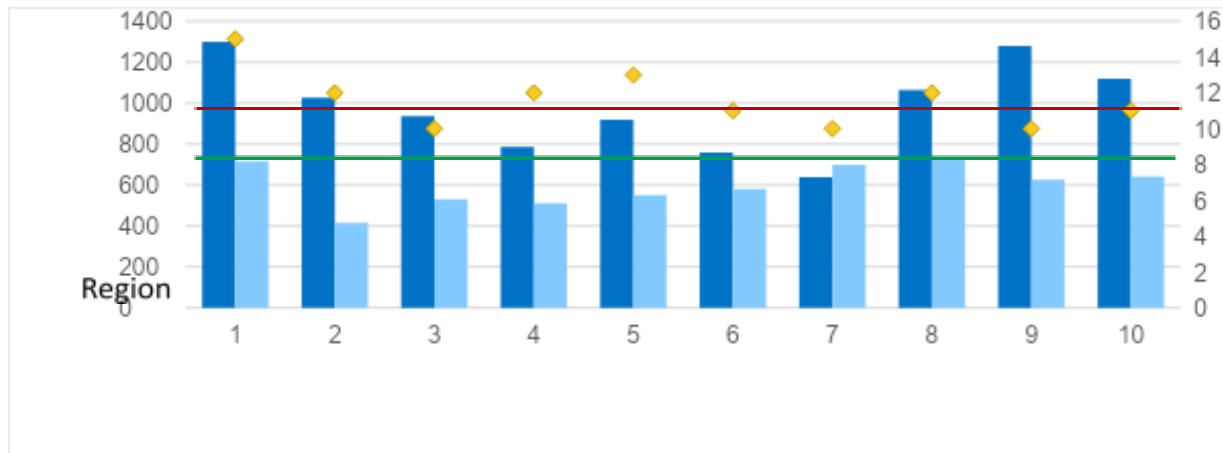
Assistant Directors

The Executive Director of Instruction Crowley supervises nine Assistant Directors (AD) who liaison with schools to support all aspects of special education. The Council SST was informed that each AD is aligned to schools supervised by one of the nine school superintendents. Exhibit 8a shows by region the wide variance of disability identification, settings in which they are educated, and school numbers.

- **SwDs.** The overall average is 923 (red line); the range is 639 (Region 7) to 1,300 (Region 1).
- **High Need.** The overall average is 600 (green line); the range is 511 (Region 4) to 733 (Region 8).¹⁰⁰
- **Schools.** The overall average is 11.6; the range is 10 (Regions 3, 7, and 9).

Exhibit 8a. By Region Number of SwDs and of SwDs with High Need

¹⁰⁰ Source: Enrollment as reported in Aspen, October 2021. The high need category includes students in strand programs and separate schools; students with an out-of-district placement are excluded from the data set.



The number of SwDs that the ADs are responsible for is not equally distributed yet the staff to support each AD is, which heavily impacts the frequency and intensity of their support to schools. The ADs are supported by one Inclusion Support Specialist and .5 Community Field Coordinators (CFC) who are experienced paraprofessionals and support this group in schools. The Inclusion Specialist (Sullivan) reports to Viviani and supervises the Inclusion Support Specialists. The ADs address broader school issues while the specialists interface with teachers to support and improve inclusive instructional practices. Although the two groups work collaboratively, it was suggested that the groups would be better aligned if the inclusion, family and community liaison, and AD group reported to Crowley

There has been a rotating group of ADs with some having less than one year of experience and others who are new to positions that remained vacant for varying periods of time. As a result, the group does not have extensive AD experience with a deep portfolio to effectively address the issues they face. Reportedly, one reason for this circumstance is that ADs pay scale is typically lower than former position levels and they work 225 days, which does not ensure that Extended School Year prep and support are covered. It was also reported that Ads have not had an effective onboarding process or common expectations for their role. Some Ads provide PD, participate in walk throughs, meet weekly with school representatives, etc., while others do not visit schools regularly.

OSE Support for Students Educated in Strand Programs

OSE’s organizational chart shows leadership positions for EC and the Applied Behavior Analysis Strand (ABA). No positions are designated for other strand or disability areas.

Support for Early Childhood and Program Strands

The information below describes the leadership support and their direct reports for EC and ABA.¹⁰¹

¹⁰¹ A developmental disability significantly affects verbal and nonverbal communication and social interaction. The terms shall have the meaning given it in federal law: Autism is a developmental disability significantly affecting verbal and nonverbal communication and social interaction, generally evident before age three, that adversely

- **EC.** The supervisor directs 4 coordinators, 7 liaisons, and 2 clerks. (Overall, 1,077 children with disabilities are 3-5 years of age.)
- **ABA.** The Assistant Director supervises 18 PDs, 166 school-based ABA Specialists, 30 coverage paraprofessionals, 2 transportation PDs, and a technician. Some 1,419 students are educated with ABA inclusively or separately. (Overall, 1,655 students are identified with autism, although students with other disabilities may be in this strand.)

Disability/Strands with No Specified Leadership Support

No OSE specified person is identified in the Organizational Chart or described as providing support for students in strands for emotional impairments, intellectual impairments, SLD, and severe/multiple disabilities, or for students with vision/hearing impairments. The Budget Guidance document refers to an FTE Strand Specialist allocation based on the number of students with emotional impairments in a school. Furthermore, there is no OSE centralized support or FTE school-based support for students with intellectual impairments or SLD.

- **Intellectual Impairment Strand.** Includes students with disabilities that are mild, moderate, or severe/profound. This strand comprises some 911 students.
- **SLD Strand.** Comprises some 1,470 students, which is a larger number of students than those in any other strand.

More generally, there is no identified person to provide leadership for students with significant cognitive disabilities who participate in the MCAS Alternate Assessment (MCAS-Alt), which are based on “alternate academic achievement standards.”¹⁰²

Without active leadership and support, school leaders, ILTs, and classroom personnel are on their own to gain the expertise they need regarding evidence-based practices necessary to improve teaching/learning.

School-based Administration and Operation of Special Education

School-based COSEs function as the principal’s designee for special education. As such, they serve as the IEP representative and facilitate IEP meetings. They meet with families and help to complete IEPs and various other types of documents. Interviewees shared the following concerns about insufficient resources COSEs have been given in order for them to effectively carry out their job responsibilities.

affects a child's educational performance. Other characteristics often associated with autism are engagement in repetitive activities and stereotyped movements, resistance to environmental change or change in daily routines, and unusual responses to sensory experiences. (OSE Policy Procedure Manual, Location Reference Guide)

¹⁰² See, for example, the Resource Guide to the MA Curriculum Frameworks for Students with Disabilities, ELA/Literacy (PreK-Grade 12), retrieved from <https://www.doe.mass.edu/mcas/alt/resources.html>.

- **Caseloads.** COSE caseloads are extremely variable and there is no transparent criteria for their distribution by COSE assignments to schools, which may range from one to three. High caseloads make it difficult for COSEs to support teachers as requested.
- **Clerks.** A formula is apparently used to allocate clerks to schools, there appears to be a lack of clarity about the allocation and its basis. This issue is not addressed in the FY23 Budget Guidance document.
- **Unrelated Tasks.** Depending on school administration, COSEs may be asked to carry out tasks unrelated to their job responsibilities, such as lunch duty or bus duty that may comprise 10 to 20 percent of the workday.
- **Professional Development.** COSEs have monthly PD, but a need was reported for the writing of IEP goals aligned with the science of reading, goals associated with grade level content, and goals ambitious and achievable given high quality instruction and supports. PD has not provided for issue-based cross conversation to problem-solve common challenges, including ensuring policy and procedures are followed.
- **Mentoring.** While there is informal mentoring for new COSEs, there is no structure in place for these individuals or for those who need additional support.
- **Contract Limitations.** COSE job responsibilities associated with instruction and support to classroom teachers are not aligned with contractual terms. For example, engaging in classroom observations to provide teachers guidance and resources to support attaining student outcomes, providing professional development and coaching for teachers and staff that is unique to school needs.
- **EDPlan.** There are various functions that COSEs cannot perform without the AD's involvement, such as removing documents uploaded by mistake, fixing simple errors, etc. This degree of oversight contributes to COSE's workload and may not be necessary.
- **Compliance.** High COSE caseloads have impacted BPS compliance rates. In addition, COSEs new to the position may be faced with a large number of outstanding evaluations or IEPs. With no additional help, catching up is difficult. Exhibit 13a shows a continuing improvement of timely evaluation rates, from October 2021 (78 percent) to July 2022 (86.8 percent). Exhibit 13b shows, however, that the number of overdue initial evaluations only fell by 33 from October 2021 (206) to July 2022 (173). According to DESE's 2020-21 report (the latest data reported) BPS's rate was 90 percent. The federal compliance rate requirement is 100 percent.¹⁰³

Exhibit 13a. Timely Evaluation Rates¹⁰⁴

¹⁰³ Retrieved from https://profiles.doe.mass.edu/gis/sped_map.aspx?orgcode=00350000.

¹⁰⁴ Source: EdPlan. Compliance rate is calculated by subtracting the total annual reviews past due + re-evaluations past due from the total number of students eligible for special education and related services, divided by the number of eligible students. Initial evaluations are excluded from the compliance rate

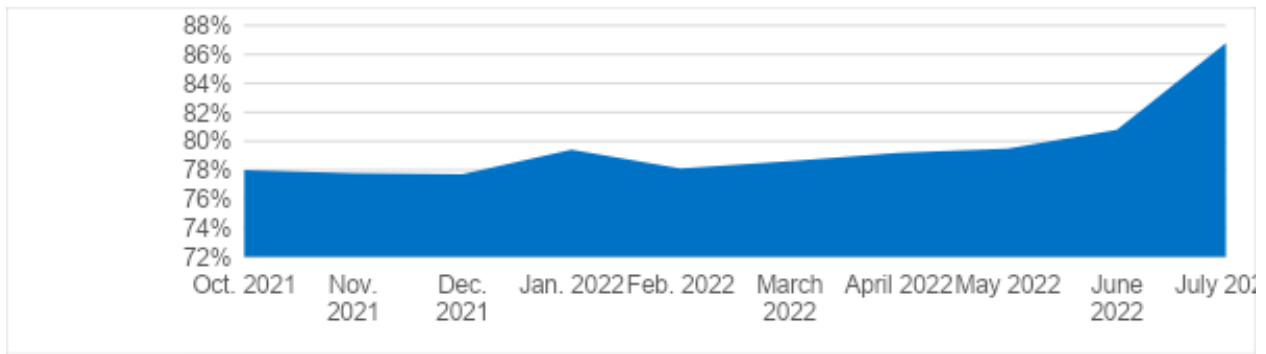
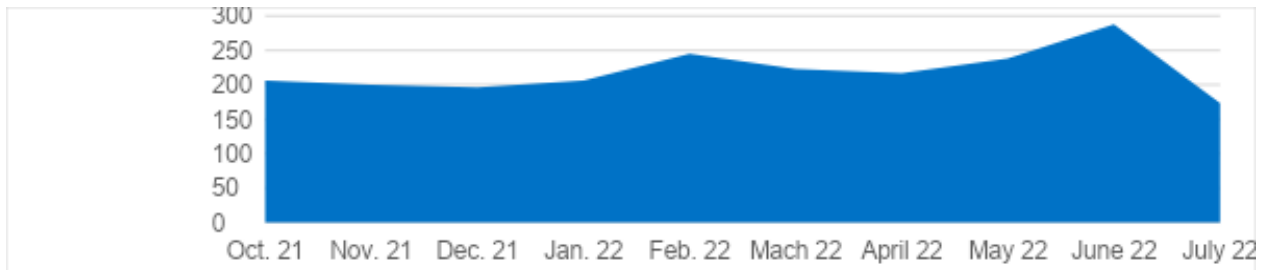


Exhibit 13b. Number of Initial Evaluations Past Due



With COSEs functioning as the principal designee for special education, the issue of accountability received attention for various reasons.

- **Personnel Evaluations.** There were suggestions for school compliance rates to be aligned with COSE, principal evaluations, and School Superintendents. However, there were concerns that negative consequences could be associated with noncompliance conditions beyond the COSE and/or principal’s control. Furthermore, principals need such tools, such as access to compliance reports to follow up as needed.
- **Accountability on Discretion.** It was shared with the Council SST during interviews that mechanisms are needed to identify and address principals not following through on expenditure expectations made during probable org. For example, using funds targeted to hire a strand teacher for other unrelated purposes.
- **Principal Oversight of COSEs.** Structures are needed when a principal, as a COSE’s supervisor, expects the COSE to take a position at an IEP team meeting that is counter to the COSE’s professional judgement. This circumstance, which is not unique to BPS, typically is associated with a principal’s desire to change an IEP-related placement that would result in a student’s transfer to another school.

OSE Draft Strategic Plan

OSE’s Draft Strategic Plan was produced by previous leadership and not finalized. The draft plan includes a preface that references the segregation of SWDs from their peers at levels above national and urban school district peers, including instruction in substantially separate settings at 2.4 times the national average and “egregious” disproportionality of Black and Brown males

receiving special education. Along with various needs to be accomplished, the preface stated the “need to create a special education system” that is driven by six different factors, such as student need drivers of resources; stronger academic/ behavior interventions as part of a robust MTSS system; interruption of systems that perpetuate disproportionality; etc.

Based on interviews, it was also clear that a standard of practice for staff on the expectations for communication and engagement with schools, families, and across departments is needed. In addition, how OSE will be ensuring accountability for meeting compliance activities internally and with schools. These are examples of items that must also be included in the strategic plan to address high OSE staff turnover rate, compliance, and quality supports and services.

The Plan has six additional priorities that address 1) pandemic recovery activities, such as compensatory services and compliance improvement, 2) student achievement and teacher expertise, 3) develop a needs based system, 4) increase opportunities for inclusion, 5) improve supports for students with emotional impairments, and 6) ensure appropriate settings. Various activities had merit, such as creating entrance/exit criteria for programs to support education in the least restrictive environment, others did not. For example, a research project to examine placement strand functions for disproportionality impact is unnecessary when data shows the extent of this problem.

Recommendation 8. BPS Collaboration, OSE Structure, and School-based Support

Establish expectations of interdepartmental collaboration and collaborative interactions with School Superintendents and schools, consider recommendations for OSE’s organization, and strengthen OSE support to schools and COSEs.

a. Interdepartmental and School Collaboration

To the maximum extent, expect strong collaboration at all levels of BPS operations to leverage their resources to support teaching/learning opportunities that enable SwDs to learn within regular classes to the maximum extent appropriate and participate in activities with nondisabled peers.

- **Align BPS’s Inclusion Plan with all Related BPS Citywide Change Initiatives.** Have all office, department, and units having personnel with responsibilities for supporting the implementation of school-based activities embed the principles of inclusive instruction in their written guidance, assistance, and professional development. Expect these activities to include how supplementary aids and services can be used to support general core instruction¹⁰⁵ and strategies for differentiating instruction for students with different learning needs and abilities.

¹⁰⁵ Supplementary aids/services include but are not limited to adapted equipment, universal design for learning (UDL), assistive technology; training for staff, student and/or parents; adapted materials (e.g., books on tape) and paraprofessional support. See, for example, the federally funded IRIS Center, which is housed at Vanderbilt Peabody College, is dedicated to improving educational outcomes for all students through the use of effective evidence-based practices and interventions. Retrieved from <https://iris.peabody.vanderbilt.edu/>.

- **Maximize Collaboration.** The implementation of Recommendations 2 (MTSS), 6.1 (establishing foundations for inclusive practices) and 6.2 (phased in school-based planning/implementation) requires an “all hands on deck” collaboration between central office and School Superintendents with their respective sets of principals/headmasters.
- **Recruitment.** Marshall central office resources across departments to leverage their knowledge and resources to maximize recruitment activities and expedite the filling of some 457 OSE vacant positions, as well as 54 social work and nursing vacancies.¹⁰⁶

b. Collaboration between School Superintendents and Assistant Directors

Establish expectations that each School Superintendent and the AD assigned to the same set of schools schedule regular meetings to address trends across the schools, review KPI outcomes, strategize next steps, etc. Expect other offices with personnel aligned with regions to engage with both the AD and School Superintendent. Include this expectation in School Superintendents, OSE Assistant directors, and other pertinent staff member’s performance evaluation measures.

c. Proposed Changes to OSE Organizational Structure

Give serious consideration to the following organizational changes, which are noted in Exhibit 8.1 to illustrate this proposal, and subsequent text below the exhibit. Also, consider changing the name of the office to represent oversight for specially designed instruction¹⁰⁷ and for services available to all students in need, regardless of their disability status. Such names used by other urban school districts are Specialized Services, Student Services, Special Education Instruction and Student Support Services, etc. To frame suggested changes, the term “leader” is used and is designated by level of leadership to afford flexibility within BPS’s personnel hierarchy. Position titles currently in place have remained the same for ease of identification.

Exhibit 8.1. Recommended Changes

Chief (5 direct reports proposed)

- **Family Community Liaison (currently reports to OSE Operations)**
- **Specially Designed Instruction (SDI) Leader 1 (5 direct reports proposed)**
 - Regional/OOD School Support Leader 2 (**Proposed** with 17 direct reports)
 - o Assistant Directors (current with 10 regional ADs aligned with a school superintendent)
 - o OOD Schools Assistant Director (Current position with 7 reports)
 - **2 ELSwD Supervisors** (current position)
 - **Citywide Program Leader 2 (Proposed** with 4 direct reports with citywide responsibilities)
 - o Early Childhood Supervisor (current position with 7 reports)

¹⁰⁶ Based on data provided by BPS to the Council SST.

¹⁰⁷ IDEA uses the term “specially designed instruction” to define special education.

Three new positions proposed to support high standards/practice for citywide programs are below.

- o Emotionality-associated Leader 3 (1,167 total students, 450 students in social emotional strand, 33 classes, 8 schools, and 306 in public/OOD schools)
- o Cognitive-associated Leader 3 (662 total students, 839 students in a strand, 52 classes, 16 schools)
- o SLD Associated Leader 3 (2,676 total students, 1,470 students in strand, 37 classes, 11 schools)
- **ABA Assistant Director** (current position with 211 direct reports listed, with 166 ABA specialists school-based)
- **Placement Director** (current position under OSE Operations)
- **Support Services Leader 1**
- **Related Services Senior Director** (current position with direct reports by speech/language pathologists, OT, PT and 4 other RS areas)
- **Behavior Health Senior Director** (current position with direct reports by school psychologists and 2 other positions)
- Proposed:** support for school social workers and nurses
- **Social Workers Leader 2** (school-based)
- **Nurses Leader 2** (school-based)
- **Compliance Manager (contractor)**
- Compliance Assistant Director (4 direct reports)
- Compliance Technician (Current position)
- **Operations Director**
- Budget/Operations (Current position)
- Special Education Transportation (Current position)

- **Explanation of Recommended Changes Shown in Exhibit 8.1 and Associated Rationales**

- **Chief Officer.** Have the office led by a chief officer, which would give the office a cabinet seat. The complexity and high needs of SwDs requires leadership conversations to include the considerable needs of this population and consideration of unanticipated consequences that frequently occur when a representative voice is not heard. (Note: the same consideration applies to leadership of OMME.)
- **Family Community Liaison,** a current position that would transfer from OSE operations to a direct report to the Chief Officer. This move would give this individual a higher degree of visibility and support and exemplify the office’s recognition of this important function.
- **SDI Leader 1.** This proposed position with direct report to the chief, would have five direct reports.

- **Regional Support/OOD Leader 2.** This proposed position would supervise the 10 current assistant directors who are assigned to schools aligned with School Superintendents. It would also supervise the current OOD Schools Assistant director who has seven direct reports.
- **Two ELSwD Supervisors.** These are current but vacant positions.
- **Citywide Program Leader 2.** This proposed position would have four direct reports. One position currently exists and three would be new. Currently, early childhood and ABA-based programs have any citywide support. The three additional leaders are necessary to establish/monitor program quality standards (including for students receiving instruction aligned with alternate achievement standards), provide training (including job-embedded training), conduct classroom observations with feedback, support COSES, etc.

Exhibit 8.1 shows for each of the proposed direct reports: total number of students, number educated in the strand, number of classrooms, and number of schools.

- Early Childhood Supervisor (current position with seven direct reports)
- Emotionality-associated Leader 3
- Cognitive-associated Leader 3
- SLD Associated Leader 3
- **ABA-based Assistant Director.** This current position oversees the ABA-based strand. Currently, it is the only position that supports teachers/students placed in a strand program. (Note: for organizational coherence, consider having this position report also to the proposed Citywide Program Leader 2.)
- **Placement Director.** This position is currently housed in OSE operations. By reporting to the proposed Citywide Program Leader 2, there would be a coordinated approach to the placement process.
- **Support Services Leader 1.** This proposed position would have four direct reports (two current and two proposed). Each of these direct reports are/would be involved with personnel who directly provide services to students with/without disabilities and play important supportive roles for inclusive education.
 - **Related Services Senior Director.** This current position has direct reports by speech/language pathologists, occupational and physical therapists, and four other related service areas.
 - **Behavior Health Senior Director.** This current position has direct reports by school psychologists and two other personnel areas.
 - **Two proposed positions: Social Work Leader 2 and Nurse Leader 2.** Moving administrative support for these positions would, by joining forces with school

psychologists, promote a cohesive approach for students' positive behavior and social/emotional well-being.

- **Compliance Manager.** This current position has two current direct reports: a compliance assistant director with four direct reports, and a compliance technician.
- **Operations Director.** This current position has two current direct reports: one for budget/ operations and one for special education transportation.
- **Intervention Team.** Consider having a multidisciplinary team including, e.g., special educator, psychologist, social worker, BCBA, etc., and bilingual team members. Have the team report to the Chief due to the multidisciplinary approach proposed. Have an administrative/quasi-administrative individual deploy team members for intense, short term school-based interventions to support teachers of students with behavior that is interfering with instruction and potentially causing removal to a more restrictive setting. Support would include 1) modeling instruction/coaching, 2) facilitating functional behavior assessments and drafting behavior intervention plans, 3) suggesting/modeling use of universal design for learning principles, etc.

To deflect dependency on the use of a team member, establish a process for requesting assistance with a description of interventions in use, the principals confirmation of their use, and the principal's commitment to monitor the teacher's use of the team member's recommendations.

- **OSE and Office of Inclusion Specialist Collaboration.** Include in the written guidance referenced in Recommendation 6.1.c information that clearly describes the expected roles/responsibilities of OSE's Assistant Directors and Inclusion Specialists, and Office of Inclusion Specialists. This clarity is especially important because of the similar titles for the inclusion specialists.
 - Have the OSE and Inclusion office leaders arrange scheduled time for these personnel groups to collaborate and share information that informs each other's work. In addition, involve the newly recommended SDI leadership position and direct reports to share/receive relevant information. The same is true for the involvement of related services personnel who would further contribute to rich conversation and another dimension of perspective.

d. Assistant Director Workloads and Compensation

Review the large regional variances for the number schools and overall disability rates, which are shown at Exhibit 8a. Consider having one or two additional staff persons to support the ADs with the largest number of schools and disability rates. These individuals may be special educators with a high level of expertise able to carry out assignments under the AD's supervision. This role would also provide a mentoring opportunity for the special educators and provide a pathway to AD employment and reduce the time to fill vacancies.

A last area for recommendation regarding ADs is increasing the salary of ADs who each work with a set of regional schools to improve the applicant pool for the frequently vacant positions. These individuals are on a 225 day salary with responsibilities for extended school year, so their days of work should increase as well to potentially 235 days. Currently by accepting the AD position ADs they are paid at a lower rate than previous teaching positions in some cases. .

e. Coordinators of Special Education (COSE)

COSES are a critical support provided directly to schools in the area of special education. They have IEP roles and responsibilities as well as instructional support responsibilities at school sites. Use an external partner to shadow a representative sample of COSEs to measure their practices against the job description. Have the partner assess the extent to which the COSE gave/had time to give teachers instructional support, such as classroom coaching and modeling based on requested support or need, and whether the sample of COSEs had the expertise to give such support. Use this information to assess these factors and recommend any needs for training, removal of obstacles interfering with job performance, etc.

Time Frame: For the **beginning of the 2023-24 school year.**

9. Monitoring, Earned Autonomy, and Accountability

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

Other research has found similar results.⁹⁵ School districts that effectively support school leadership often demonstrate the ability to facilitate learning, address barriers, and govern and manage the district in ways that prioritize good instruction. In pursuing these goals, districts showing improvement have mechanisms for systemic planning, program implementation, evaluation, and accountability.

Tools Supporting Culturally/Linguistically Sustaining Practices, Policies, and Mindsets

The Office of Equity and Strategy has an excellent Toolkit “intended to continue the work of building capacity for culturally and linguistically sustaining practices, policies, and mindsets across the Boston Public Schools system.”¹⁰⁸ The Home page focuses on equitable literacy instruction to enact “research-based literacy/bi-literacy practices that provide all students, especially those who have been historically undeserved, to fully realize their brilliance and become readers and creators of powerful text.” The full website includes three tools with their own webpages and links to others that are not specifically stated but are reasonably inferred to support BPS's implementation of its equitable literacy instruction, which was addressed earlier in this report.

Culturally Responsive Instruction Observation Protocol (CRIOP)

This comprehensive model and evaluation tool operationalizes culturally responsive instruction around six pillars: classroom relationships, family collaboration, assessment practices, instructional practices, discourse, and critical consciousness. It does not appear that the examples given are broad enough to address the observations that would be necessary to address the particular circumstances present in classrooms that are inclusive with or separate for students with disabilities, or with their families. This is particular true for families of students with significant disabilities who are instructed with alternative curricular standards. The website has an impressive look with a deep inventory of resources. These did not include how the tool could be used for instructional walkthroughs and the expected amount of time it would take to observe all indicators and implement the family component. Perhaps because of its complexity and the amount of apparent time it would take to use, interviewees indicated that the tool is not frequently used and is not authentically implemented when used.

¹⁰⁸ Retrieved from <https://sites.google.com/bostonpublicschools.org/ogequityandclsptoolkit/toolkit-home>.

SLD Substantially Separate Walkthrough Survey. When asked to provide any protocol used to observe inclusive practices, BPS’s representative produced the SLD Walkthrough Survey. When asked about this document, interviewees responded that it was informed by the equitable literacy and CRIOP tool. The document describes expectations for 1) positive classroom climate, 2) room arrangement, 3) visual supports, 4) age appropriate materials/furniture, 5) student engagement, and 6) a notes section for a) accommodations/modifications observed, b) inclusion opportunities, c) teacher and student led activities, and d) school-based family communication expectations/evidence. As a walkthrough for students with SLD, there were indicators for equitable literacy and the rules-based reading instruction that one would expect to see, how instruction incorporated grade level core curricular standards, or use of universal design for learning (UDL) principles.

Culturally and Linguistically Sustaining Practices (C.L.S.P.)

These practices are described as follows –

Culturally and Linguistically Sustaining Practices draw upon, infuse and evoke students’ existing schema, experiences, funds of knowledge, and perspectives to optimally facilitate learning. C.L.S.P. also intentionally seek racial and cultural equity and pluralism in order to deliberately tailor district-wide norms, policies and practices to affirm the identities of and expand opportunities for historically marginalized students. C.L.S.P. heavily relies upon the scholarship and research of its preceding models, namely culturally relevant, culturally responsive and culturally sustaining pedagogies. (Gay, 2010; Ladson-Billings, 1995; Paris, 2012). — Dr. Colin Rose & Hayden Frederick-Clarke¹⁰⁹

The Office of Opportunity Gaps webpage displays in a graphically pleasant way the flow of competencies for 1) awareness of one’s lens and bias; 2) cultural learning/relationship building; and 3) culturally/linguistically sustaining practices. Each of these competencies are described with attributes on one page and observable behaviors on a second page. The next webpage for this are provides BPS Essential Toolkits for 1) instructional leadership; 2) instructional focus; 3) cognitively demanding tasks; and 4) safe, health, and welcoming schools. Five additional checklists are also linked.

Racial Equity Planning Tool (REPT)

The website also provided information about this tool, which “lays out a clear six-step process to operationalize [BPS’s] commitment to ensure each decision [made] is aimed at closing opportunity gaps and advancing racial equity. The steps are 1) desired results and outcomes; 2) analysis of date; 3) stakeholder engagement; 4) strategies for racial equity; 5) implementation plan; and 6) accountability and communications.¹¹⁰ The full tool is provided as a link. used to develop the SY23 Budget Guidance document, and that during various interviews/ focus group

¹⁰⁹ Retrieved from <https://sites.google.com/bostonpublicschools.org/ogequityandclsptoolkit/clsp>.

¹¹⁰ Retrieved from

<https://sites.google.com/bostonpublicschools.org/ogequityandclsptoolkit/racial-equity-planning-tool>.

meetings this tool was referenced with positive regard. Unlike the above two complex tools, the REPT presents a clear roadmap for decision-making with a lens of closing opportunity gaps and advancing racial equity, and could be adapted to meet the needs of SwD.

Monitoring Student Achievement Expectations

BPS’s SY22-23 Assessment Memo, which was updated August 16, 2022, describes the district’s building of a “comprehensive and balanced anti-racist assessment system. This system has the fewest assessments possible, each with a clearly defined and understood purpose, that will allow educators to make informed, culturally-responsive instructional decisions.” Short cycle formative and interim assessments results lead to the use of periodic (Tier 2) or high frequency (Tier 3) progress monitoring. The memo links the CRIOP, which is described in Section 15, as providing examples of classroom embedded formative assessment practices.

The memo describes expectations for the district’s “comprehensive and balanced anti-racist assessment system.” The expectations are aligned to BPS’s districtwide instructional focus: Every student in every classroom every day has access to standards aligned, culturally and linguistically responsive equitable literacy. As BPS more consistently implements effective equitable literacy practices, the data provided by assessments will inform educators to meet the learning needs of all students. This memo is easy to read, using user friendly tables to present and links to additional resources. Exhibit 15a shows minimum school assessment expectations for each grade and frequencies for each. The memo provides additional information for each assessment [description, test date(s) and extended use].

Exhibit 15a. BPS Formative Assessment Expectations

Expected Assessments	Grade	Frequency
PALS/Heggerty	K1	2x per year
NWEA MAP Reading Fluency (NWEA)	K2-2	3x per year
NWEA MAP Growth Reading & Math, a DESE approved dyslexia screener	3-11	3x per year
Pre-IPT (for EL proficiency)	KO	1x per year ¹¹¹
WIDA Kindergarten Screener (EL Students)	K1	
Strongly Recommended Assessments		
Illuminate Interim Assessments ELA & Math	2-11	2x per year
Illuminate Interim Assessments Science	3-10	2x per year
FastBridge Reading & Math Progress Monitoring	3-12	As needed

The Panorama data platform is used to collect key student information and give a visual dashboard reporting. With this platform, teachers and others are able to 1) create individual and group interventions, 2) create and monitor student plans, 3) triangulate multiple data sources, and 4) monitor MTSS progress. PowerPoint documents provide easy to follow and

¹¹¹ Rolling testing April-June for newly enrolled students.

illustrative information. The Assessment Memo does not include any expectations for the use of this platform.

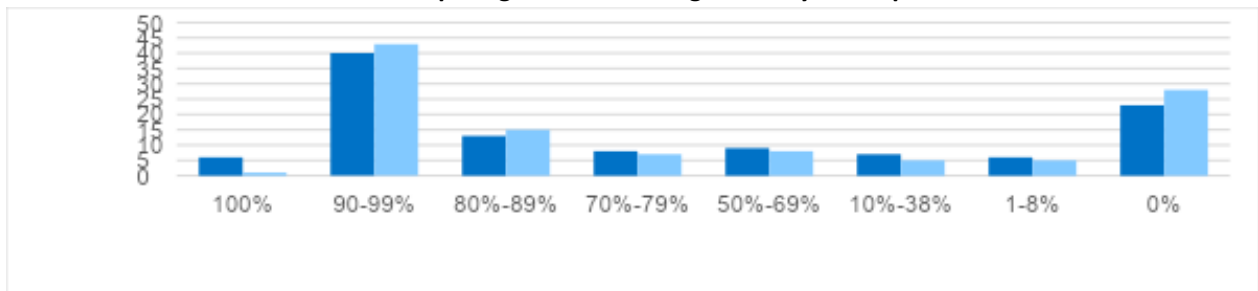
Interviewees reported that for grades K-2, monitoring expectations are met by about 85 percent of schools; for 3rd grade and above about 60-70 percent of schools participate with an estimated 80 percent of students included. It was unclear what the specific monitoring activities are required and how the district or School Superintendents consistently use and monitor this data.

MAP Participation

Based on data BPS provided, the numbers of schools participating in MAP reading and math assessments by various student participation rates for SY2021-22 are –

- **90-100% Participation.** 46 schools (41 percent) for reading and 44 (39 percent) for math.
- **80-89% Participation.** 13 schools (12 percent) for reading and 15 (13 percent) for math.
- **50-79% Participation.** 17 schools (15 percent) for reading and 15 (15 percent) for math.
- **10%-38% Participation.** 7 schools (5 percent) for reading and 5 (4 percent) for math.
- **1-8% Participation.** 6 schools (5 percent) for reading and 5 (4 percent) for math.
- **0% Participation.** 23 schools (21 percent) for reading and 28 (25 percent) for math.

Exhibit 15b. Percent of Schools Participating in MAP Reading/Math by Participation Rates¹¹²



Quality School Planning

School planning is critical to executing focused and targeted actions designed to address identified issues and associated expected outcomes. BPS has developed Quality School Plans (QSPs) for this purpose. DESE’s 2022 report described its review of submitted QSPs as varying in quality, lacking consistent reference to/common measures for equitable literacy outcomes, and often omitted specific MAP and/or CRIOP targets to measure progress. Our review of QSPs provided to the Council SST in early September noted the same issues, and submitted samples lacked specificity, especially for students’ groups i.e. SWD and ELSwD. These comments raise the question of any outside quality review process in place to provide feedback and knowledgeable technical assistance designed to support needed improvements. In addition, it was unclear how

¹¹² Mid-Year Winter MAP Achievement, SY21-22. Source: NWEA (MAP), Aspen (enrollment and demographics); includes Irving, Timilty, Jackson-Mann, and Mission Hill schools, which closed at the end of SY21-22.

School Superintendents use the QSIP over the year and monitor progress by bringing in additional expertise from OSE.

Autonomy

Unlike traditional schools, pilot and autonomy schools have a high degree of autonomy. Reportedly 40 percent of schools (pilot and autonomy) have control over assessments, as well as budget, staffing, governance/school policies, and curriculum. As previously discussed, schools that require an application, and some that require an examination, restrict access by students with disabilities placed in special education strands, enroll lower proportions of English learners, as well as other students with low performance. Focus group participants also shared their perceptions that Budget Guidance permits an inequitable distribution of intervening personnel equitably distributed among schools. For example, some schools choose to fund reading specialists while other schools with need do not. Earlier in the report, another example was given about high PD rates for equitable literacy that would be even higher with less autonomy. Like BPS's system of educating students with disabilities either in their chosen school (resource model) or by placement (strand model), this model of autonomy is a second dichotomous structure that presents a layer of complexity and barriers to consistently implementing practices in every BPS school to address student achievement for students with disabilities.

Accountability

As discussed above, BPS's districtwide focus is on equitable literacy, where every student in every classroom every day has access to culturally/linguistically responsive instruction based on aligned curriculum standards. The district's assessment program, which is based on evidence-based progress monitoring practices, are designed to identify and provide tiered supports/ interventions for students who are not achieving as expected. BPS's important equitable literacy focus, array of student assessment/monitoring platform, and tools available for implementing culturally/linguistically sustaining practices support and result in improved student achievement only when they are used with fidelity. As the above information concerning schools' use of the MAP to monitor student achievement is inconsistent and far below BPS's expectation. Furthermore, schools have discretion to monitor student progress using strongly recommended Illuminate and FastBridge interim and progress monitoring assessments.

Equitable Literacy Professional Development Aligned to Teacher Goals

As the DESE 2022 document reports, BPS lacks a system or accountability mechanism to implement its goal of aligning equitable literacy professional development to individual educator goals, especially for meeting the needs of SwDs. Although SY2022-23 QSPs are to have goals aligned to one of the five components of equitable literacy, with school leaders held accountable through their performance evaluations, no structure exists to ensure individual teacher goals align with the equitable literacy focus, and their goals varied widely across schools. This lack of alignment not only impacts teacher accountability, with associated

instructional practices that do not consistently align with student needs, it also negatively impacts the receipt high-quality professional development for equitable literacy.

Accountability Mechanisms for School Superintendents and Principals

The DESE 2022 report also noted school leader’s acknowledgement of support provided by regional school superintendents. BPS School Superintendents, however, continue to lack a clearly scoped role-clarity or accountability mechanisms, and how they can work with the Academics/Professional Learning team and Transformation Office to coordinate effective supports to schools.

Only recently were OSE’s assistant director (AD) liaisons reorganized and reassigned to the schools sets aligned with each school superintendent. This change provides the ADs and school superintendent the necessary opportunity they need to review quantitative/qualitative data for their common set of schools and identify the assistance/interventions they need to improve. However, more will be needed, and capacity of other instructional departments will be needed on key approaches for meeting the needs of diverse learners, especially SwD and ELSwDs. The collaboration, along with personnel from other BPS units, is essential to support coordinated actions and school-based activities to promote effective inclusive practices.

Of the Boston School Committee’s five student outcome goals, the third is for students with disabilities to thrive and grow in rich and inclusive learning environments. The goal is measured by the percentage of students with disabilities with an MCAS ELA student growth percentile of 50 or higher. This goal has a 2019 baseline rate of 49.3 percent of students meeting this outcome. The suggested target is 53.8 percent for 2023. According to information provided to the Council’s SST, BPS expects principals to promote inclusive instructional practices in their schools, with a tiered process to identify/support students having difficulty accessing general education instruction. The district’s recently established centralized inclusion team is charged with supporting the work of schools to achieve the new contract provision that “all classrooms in the Boston Public Schools will be inclusive.” For the Boston School Committee’s disability achievement goal to be met/exceeded and for BPS’s lofty expectations to be realized, structural changes are necessary for budgets to provide for sufficient human/material resources and necessary high quality training. Also necessary are clearly articulated expectations for school-based standards reflecting usage of such resources/training, follow-up instructional practice guidance (sufficiently flexible to acknowledge individual school circumstances), and a system of accountability that includes these and other associated elements, such as assessment. The School Superintendents play a critical role in meeting the School Committee’s goals for students with disabilities.

Quality School Framework

In June 2019, BPS revised its School Quality Framework (Framework) Policy. Recognizing that no single measurement can ever capture the full range of characteristics that make a school “high quality” to each student/family, the Framework incorporates a broad range of school quantitative/qualitative quality measures that has two purposes. The Framework –

- **School Choice.** Gives students/families a brief overview of key school characteristics. Also, domain scores are embedded in the assignment process used to help determine potential school choices. available to students. The Council SST notes that students educated through a special education strand (inclusive or substantially separate) have school placements outside of the regular enrollment process and these measures have little or no relevance to these students and their families.
- **Accountability.** Provides transparency for school quality to promote greater public accountability. By identifying assets/gaps in student performance/opportunities, students/ families and other stakeholders are able to have more informed/focused conversations about school quality and monitor the performance of BPS schools.¹¹³

The Framework has measurements in five domains with 21 outcomes. The achievement and growth of students with disabilities, English learners and low income students are represented throughout the Framework. The measurements do not include the group of ELSwD, which are likely to have different outcomes than either the SwD or EL groups. Other notable observations are described below for the student performance domain.

- **Outcome 1 - Critical Skill Progress.** The “all students” groups measured includes only SwDs receiving instruction through a resource model. While the Framework notes that this includes roughly 50 percent of all SwDs taking MCAS tests, it categorically excludes “students with autism, multiple disabilities, etc.” The restriction to “resource” also excludes SwDs educated in either an inclusive or substantially separate strand who participate in MCAS.
- **Outcome 2 – Mastery of Grade Level Content.** The “all subgroups” measured includes all SwDs, accounting for absolute achievement/growth and opportunities/resources that enable continued achievement. It is unclear whether this outcome includes SwDs participating in alternate assessments with instruction based on alternate curricular standards.
- **Outcome 3 – Academic Growth Toward Grade Level Content Mastery.** This outcome for “all subgroups has measures related to the MCAS, and may exclude SwDs taking the MCAS-Alt.

Recommendation 9. Monitoring, Earned Autonomy, and Accountability

Establish expectations for earned autonomy, monitor for these and other expectations, and hold persons accountable when expectations are not met both at the school and at central office. Apply accountability measures for performance when there has been notice of expectations and training along with physical/material resources for implementation have been provided.¹¹⁴

¹¹³ MA DESE also has an state-designated accountability system that is separate from BPS’s Quality School Framework. This report does not address the state system.

¹¹⁴ BPS’s representative informed the Council SST that as part of the SIP the district is working with the Center for Assessment and DESE to develop a performance management framework.

In addition to above recommendations for KPIs (1e, 2g, 3b, 4a, 5b, 6.1.e/j), 6.3.c, and 7c) and monitoring/accountability recommendations (1g, 2e, 4f, and 6e), review BPS' standard monitoring and accountability activities to ensure that they are sufficiently inclusive for students with disabilities, including ELs with disabilities. Also, consider the following as part of monitoring expectations and accountability:

a. Tools

Use the expert partner to review current BPS tools for the extent to which support for inclusion instruction is embedded and identify any areas for improvement. These include walkthrough surveys, Culturally Responsive Instruction Observation Protocol (CRIOP), Culturally and Linguistically Sustaining Practices (CLSP), and Racial Equity Planning tool (REPT). Also, embed in the Quality School Framework appropriate metrics particular to SwD and ELSwD, such as welcoming environments for families and SwDs, demonstrated ability to implement greater inclusion.

b. Monitoring

Determine the specific monitoring platforms that BPS will use to determine whether schools and departments are meeting expectations and KPIs for, including those articulated in this report for SwD. Panorama platform seems to provide a mechanism for monitoring student level data, including to collect and monitor SwD progress.

A circular will document the expectations for monitoring and accountability with clear timelines and activities that schools, and central office, will engage in to review and discuss the data. This will be updated annually.

c. Performance Management Framework

Annually review and grant degrees of autonomy (e.g., full, partial, none) based on the results of and expectations for the use of the following measures. Have the framework be inclusive of data

- **Fall NWEA MAP Scores.** Use these scores to support grants of autonomy by disaggregated student groups that include SwDs by English language proficiency status, black and Latinx (males and females), and socio-economic status. Exclude SwDs receiving only speech/ language, occupational, and/or physical therapy services. Also consider other groups of students who traditionally have been marginalized, such as those who are homeless or in foster care.
- **MAP Participation.** Establish consequences for school principals/headmasters who do not ensure that at least 90 percent of students participate in MAP. Disaggregate data by various student groups, including those with disabilities who participate in MCAS.
- **Weighted School Formula and Specific Allocations.** Special education aligned funds, which are allocated during WSF, are used for their intended purposes.

Time Frame: For the **beginning of the 2023-24 school year.**

Recommendation 10. Hire Expert Partner Team

The nine set of Council SST recommendations are complex, require a high degree of expertise and experience with urban districts that have a foundation and continuing improvement practices for inclusive education. In addition, BPS's current practices that have contributed to school reliance on restrictive placements for SwDs, especially for students (and particularly male) of color and who are English learners.

Given the team's recommended tight time frames for many provisions and the day-to-day activities that take over time of persons leading these efforts, we strongly recommend that BPS expeditiously hire a group of expert partners to assist with this effort. Use partners –

- With demonstrated expertise/experience in restructuring special education from a place to a service delivery system as a foundation for inclusive education, and use of separate classrooms sparingly.
- With experience using evidence-based practices that have shown improved academic and social/emotion-behavioral outcomes, including but not limited to MTSS, specially designed instruction, progress monitoring KPIs and engaging/facilitating continuous improvement cycles.
- To support BPS leadership/others to operationalize/implement these recommendations and support training to central, region, principals and other school-based personnel.

APPENDICES

Appendix A. Data and Documents Reviewed

- CGCS Data Request: schools and types; SWD enrollment; disability type; SWD demographics; SWD educational setting; SWD EL status; sub-separate strands; MCAS participation rates and proficiency rates; SWD graduation rates
- BPS Program Designs
- BPS FY23 Weighted Student Funding Budget Template
- Developmental Continuum for Inclusion
- Parthenon Report Excellence and equity for all: Unlocking opportunities for off-track youth in Boston Public Schools
- Umana Dual Language Academy K-8: Moving toward a more inclusive community ppt
- BPS Office of Special Education 2022-2023 Organizational Chart
- McKinley Intervention Team Recommendations DRAFT September 2022
- Massachusetts (MA) Department of Elementary Secondary Education (DESE) Inclusive Practice Tool: WHAT TO LOOK FOR—Observations
- BPS Assistant Director of Schools and Settings Job Description
- Sample BPS IEP for English learner
- McKinley Schools Working Group
- District Curriculum Universal Accommodation Plan Working Draft 2022
- Multilingual Professional Practice Standards For the Identification and Evaluation of Students from Culturally and Linguistically Diverse Backgrounds
- CGCS Special Ed report 2019 update: Specific data exhibits (i.e. risk ratios, referrals)
- 2021 MCAS Results BPS Office of Data and Accountability
- SP301 DESE Significant Disproportionality in Special Education
- Behavioral Health School Psychologists, including race, language, and gender 2022
- Bilingual Speech-Language Pathology Assistant Proposal

- Related Services Staffing Summary
- Assessment of English Learners (EL) BPS-Speech-Language Pathology Protocol
- BPS Special Education Door to Door Transportation Data
- Draft Bilingual Special Education Procedural Manual for Bilingual English Learners with Disabilities (BLSWDs)
- SY22-23 BPS Assessment Memo *Updated August 16, 2022
- BPS 2023 Positions Data
- Office of Special Education SWOT analysis
- Sub-Separate Classroom Survey Descriptors
- MAP 2022 Achievement Data
- MAP Growth Quintile Analysis SY21-22 Winter & Spring Comparisons
- Draft Strategic Plan for Office of Multilingual Multicultural Education
- Stakeholder Recommendations COSES
- BPS Schools and Special Education Strands
- BPS SY2022-23 Special Education and EL Programs
- BPS McKinley Student Enrollment by Race Gender
- Representation and Disproportionality: Special Education in the Boston Public Schools
- SY2021-22 Office of Special Education School Committee LRE and Disproportionality
- EL Task Force Subcommittee Multilingual English Learners with Disabilities in BPS recommendations
- BPS Special Education Policy and Procedure Manual 2022-23
- BTU 2018-2021 Contract Book
- Memorandum of Understanding BPS-BTU 2021-24
- Creating and Monitoring Student Plans in Panorama
- How Might We Triangulate Multiple Data Sources? (assessments & grades)
- Sample Student Success Plans: What Might a Plan Look Like, if Implemented with Fidelity?
- FY23 Budget and Probable Org. Guidance Document

- How Can We Monitor
- BPS MTSS Progress? Fulfill BPS Policies and Ensure that Students Reach their Goals
- OSE Location Reference Guide 2022-23 (programs, schools, ratios)
- BPS District and Special Education Enrollment SY2021
- SWD demographics by Region 2021-22
- BPS School Based Equity Roundtable Handbook
- BPS Quality School Plan 90-DAY ACTION PLAN template
- Henderson SY22 School Improvement 90-DAY ACTION PLAN
- Condon SY22 School Improvement 90-DAY ACTION PLAN
- Madison Park SY22 School Improvement 90-DAY ACTION PLAN
- Brighton SY22 School Improvement 90-DAY ACTION PLAN
- Baldwin SY22 School Improvement 90-DAY ACTION PLAN
- Blackstone SY22 School Improvement 90-DAY ACTION PLAN
- OSE Workplan for Strategic Plan (Draft)
- Boston Public Schools 20/25 Strategic Plan
- OMME Strategic Plan (Draft)
- MA DESE Focused Monitoring Review Corrective Action Plan
- Home Based Model of School Choice ELL Overlay School Committee Order 2013
- Culturally Responsive Instruction Observation Protocol Fourth Revised Edition
- BPS Individualized Educational Program Template
- BPS Superintendent's Circular: Instructional System and Monitoring for Multilingual Learners 2022-2023
- BPS District ESSER Orientation June 2022 All Special Education Investments
- BPS Increasing Inclusive Practices in the Boston Public Schools June 2013
- Boston Public Schools Systemic Improvement Plan for Immediate Implementation
- MA DESE District Review Report Boston Public Schools (Follow-Up District Review Conducted March 28 – April 1, 2022)
- MA DESE District Review Report Boston Public Schools Comprehensive Review Conducted September 30—November 7, 2019

- Student Support Organization Chart
- Boston Autonomous Schools Manual: Policies and Responsibilities for Pilot, Innovation, & Horace Mann Charter Schools (September 2021)

Appendix C. Individuals interviewed and Draft Working Agenda

Wednesday, August 26 2022 (8:00AM – 1:15 PM, Bolling 2-12)		
Time	Topic	Attendees
9:00 - 9:30 AM	Family and Community Advancement & Special Education Family Liaison	<ul style="list-style-type: none"> Noel Green, Director of Family & Community Advancement Yashi Perez, Special Education Family Engagement Coordinator
9:30 - 10:15 AM	Inclusion Principals	Dr. Herve Anoh, Lyon K-12 Geoff Walker, Fenway HS Carline Pignato, Channing PK-5 Kathleen Sullivan, Haley Pilot
10:15 - 10:45 AM	Inclusion Teachers	Valerie Assamoi, Mary Lyon School Sean Alcherley, Mary Lyon School
10:45 - 11:30 AM	Special Education Assistant Directors	John Cancilla, Director of Placements Heidi Cahoon McEwen Zachary Houston, Assistant Director ABA Marcia Fitzpatrick, AD for Strive Chris Panarese, AD for K8
11:45 - 12:15 PM	Interim Assistant Superintendent Special Education	Dr. Lauren Viviani
12:30 – 1:15 PM	OSE Executive Director of Instruction	Kim Crowley
1:15 - 1:45 PM	Transportation	Delavern Stanislaus, Director Kristin Dearden, Transportation Project Manager
2:15 - 3:00 PM	Early Childhood (EC) Coordinators	Jenny Fernsten, EC Coordinator Deirdre Walsh, EC Coordinator Katie Muse Fisher, EC Coordinator Maryann Molloy, former EC Supervisor Jason Sachs, Executive Director of EC
3:30 - 4:00 PM	Central Office Administrative Staff	Janet Morrison, Admin Assistant Alicia Scott, Admin Assistant Paoli Olaverria, Admin Assistant Amanda Patterson, Guild Clerk Oline Griffin, Guild Clerk Sheila Litif, Guild Clerk-Conversions

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4:30 - 5:15pm	Related Services and Behavioral Health	Aixa Borrero Sanchez, AD Related Services (RS) Laura Lee Johnson, Supervisor RS Andria Amador, Senior Director, Behavioral Health Ivonne Borrero, Supervisor, Behavioral Health Paoli Olaverria, Special Ed. Technician
Thursday, August 25, 2022 (8:30 AM – 6:30 PM, Bolling 2-12)		
9:00 AM	Equitable Literacy	Brooke Childs, Director, Equitable Literacy
9:30 - 10:00 AM	BTU Teacher Reps	Isa Puglielli, COSE Victoria Downes, School Psychologist
10:00 - 10:45 AM	Office of Multicultural/Multilingual Education	<ul style="list-style-type: none"> • Farah Assiraj, Deputy CAO & Inter Assist Sup OMME • Fay Karp, Executive Dir. • Ignacio Chaparro, Dir of Equity and Accountability
11:00 - 12:00 PM	Transformation School Principals	<ul style="list-style-type: none"> • Grace Coleman-Burns, M.L. King Jr. K-8 • Christina Michel, Umana Academy K-8 • Mike Sabin, Executive Director of Transformation Schools
12:00 - 12:30 PM	Council of Citywide Parents	Thelma DaSilva
1:15 - 2:00 PM	Reg Ed Teachers in Inclusion Schools	<ul style="list-style-type: none"> • Liana Kefalis, Learning Specialist/

		<p>Special Education Co-teacher</p> <ul style="list-style-type: none"> • Tara Pisani, former gen ed, inclusion and learning Specialist
2:00 - 3:00 PM	Inclusion Department	<p>Ethan d'Ablemont Burnes, Assistant Superintendent Julia Bott, Executive Dir.</p>
3:00 - 4:00 PM	Chief of Schools and School Superintendents	<p>Tommy Welch, Region 1 Mary Driscoll, Elementary Drew Echelson, Chief of Schools Natalie Ake, Elementary Elena Luna, Elementary Efrain Toledano, Elementary Ted Lombardi, Secondary Eugene Roundtree, Secondary Lindsa McIntyre, Secondary Tanya Freeman Wisdom, Secondary</p>
4:00 - 4:45 PM	Academics & Professional Learning/Academic Vision/Excellence for All	<ul style="list-style-type: none"> • Sarah Jay, Assistant Director of Assessment & Strategy • Brook Childs, Director of Equitable Literacy • Shakera Ford Walker, Assistant Superintendent of Teacher Leadership

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4:45 – 5:15 PM	Equity and Strategy	Dr. Charles Grandson, Chief of Equity and Strategy Velevia Saunders, Director of Disproportionality
5:30-6:30 PM	Special Education Parent Advisory Council	Roxi Harvey, Chair Charlie Kim, Vice Chair Jonathan Reovans, Parent Edith Bazile, Board Memb at Large Sharon Daura, Secretary
Friday, August 26, 2022 (8:15 AM – 1:00 PM, Bolling 2-12)		
9:00 - 9:30 AM	OSE, Executive Director for Instruction	Kim Crowley
9:30 - 10:00 AM	Strategic Staffing	<ul style="list-style-type: none"> • Rae Catchings, Interim Chief Human Capital Officer • Janie Bell, Director of HR
10:00 - 10:30 AM	Out of District Coordinators	Judy Grady, COSE Christy Camara, COSE
10:30 - 11:00 AM	McKinley Working Group	Cindie Nielson Roxi Harvey
11:00 - 12:00 PM	School Committee	Jeri Robinson, Chairperson Michael D. O'Neill, Vice Chairperson
12:00-1:00 PM	Superintendent and Senior Leadership Debrief	Mary Skipper, Superintendent (virtual) Drew Echelson, Interim Sup/Chief of Schools Linda Chen, Senior Deputy Sup Lauren Viviani, Interim Assist Sup of OSE
Wednesday, Sept. 28, 2022 (10:00-12:00, 3:30-5:00, Virtual Interviews)		
10:00 - 10:30 AM	McKinley School Teachers	Jacqueline Daly Kathleen O'Connor Julie Cass Karyssa Budd James Molyneaux

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			Mary Nee Derrick Winston
10:30 - 11:00 AM	Inclusion Teachers		Melissa de la Rosa - Ellison Parks
3:30 - 4:00 PM	Chief Equity and Strategy Officer		Dr. Grandson
4:00 - 4:30 PM	COSE		Deidre Walsh Bonnie Paton Elizabeth Kelley Elsa Puglielli Kathy Ferguson
Thursday, Sept 29, 2022 (10:00-12:30, 3:30-5:00 Virtual Interviews)			
10:00 - 10:30 AM	Sub Separate Teachers		Megan Bernazzani Marina Ostrov
10:30 - 11:00 AM	Resource Room Teachers		Alana Greene
11:00 - 11:30 AM	Principals		Leslie Gant Tracie Walker
3:30 - 4:00 PM	School Psychologists		Alex Freeman Victoria Downes Hani Murad Desiree Rivera Jillian Archer
4:00 - 4:30 PM	Itinerants: Speech and language Therapists, Occupational Therapists, Physical Therapists		Karen Rodriguez Alexandra Cruz Kasey Fahy Amy Mullen Maryanne Johnson BethAnn Schechet Jamie King
Friday, Sept 30, 2022 (12:00-5:30, (Virtual Interviews)			
12:00 - 12:20 PM	Inclusion Specialist		Kiersten Sullivan
12:30 - 1:00 PM	DESE		Jamie Camacho Vandana Rastogi-Kelly
2:00 - 2:30 PM	EL SWD Subcommittee		Ivonne Borrero John Mudd Lauren Viviani

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			Marie Lourdes Roxann Harvey
4:30 – 5:30 PM	Office of Special Education Interim Assistant Superintendent and Senior Deputy Superintendent		Lauren Viviani Linda Chen
Friday, October 14, 2022 Virtual Interview			
2:00 – 2:30 PM	School Committee		Brandon Cardet-Hernandez, School Committee Member

Appendix C. Strategic Support Team Members

Dr. Ray Hart, Executive Director, Council of the Great City Schools: Dr. Raymond C. Hart is the Executive Director of the Council of the Great City Schools. Hart, who has more than 30 years of experience in research and evaluation, was previously the Director of Research for the Council, and his work has spanned policy areas such as post-secondary success and college readiness, professional learning communities and school improvement, teacher effectiveness and value-added analysis, early childhood education, and adult and workforce literacy. He has worked with clients from a number of federal agencies, including the U.S. Department of Education, the U.S. Department of Housing and Urban Development, the U.S. Department of State, the National Science Foundation, and many state and local departments of education. Hart recently led the Analytic Technical Support Task for the Regional Educational Laboratory – Mid Atlantic. He served as the Executive Director of Research, Planning and Accountability for Atlanta Public Schools, President and CEO of RS Hart and Partners, which is an evaluation and assessment consulting firm, and an Assistant Professor of Research, Measurement, and Statistics at Georgia State University. Prior to his work as a consultant, Hart served as the Director of the Bureau of Research Training and Services at Kent State University. His career began in 1989 as a program director for African American, Hispanic, and Native American students in Engineering and Science.

Sue Gamm, Esq., National Expert and Council of the Great City Schools Consultant: Sue is a special educator/attorney who has spent more than 40 years specializing in the systemic improvement and effective education of students with disabilities and those with academic and behavioral challenges. Sue has blended her unique legal/special education programmatic expertise with her experiences as the chief specialized services officer for the Chicago Public Schools (CPS), attorney/division director for the Office for Civil Rights (US Department of Education), and special educator to become a highly regarded national expert as an author, consultant, presenter, and evaluator. Since her 2002 retirement from CPS, Sue has worked in 27 states/District of Columbia with more than 50 school districts and five state educational agencies to improve instruction and support for students with disabilities. She has written special education standard operating procedure manuals and/or MTSS for 10 school districts, and has shared her knowledge of IDEA, Section 504, and the Americans with Disabilities Act, and related issues at more than 70 national, state and local conferences. Sue has authored/co-authored numerous periodicals and publications, including Online Guide to RTI-Based LD Identification Toolkit (National Center for Learning Disabilities); Using Multi-Tiered Systems of Support (Council of the Great City Schools) and Disproportionality in Special Education: Identifying Where and Why Overidentification of Students Occurs (LRP Publications). She has testified before Congressional and Illinois legislative committees and helped to prepare U.S. Supreme Court Amicus Curiae briefs for the Council of Great City Schools and has served as an expert witness in nine special education federal court cases.

Dr. Karla Estrada, Chief Academic Officer, Council of the Great City Schools: Dr. Estrada has spent over 25 years as an educational leader committed to closing opportunity and

achievement gaps. Prior to joining the Council, Dr. Estrada served as the Deputy Executive Director for the California Collaborative for Educational Excellence (CCEE), a statewide agency charged to lead instructional improvement and transformation support provided to school districts and charter schools, especially those addressing academic inequities among student groups. Dr. Estrada worked collaboratively with national content experts, and other CA state agencies, on district and school supports for implementing high quality instruction that prepares students for college, career, and life with a focus on marginalized students. Before working at CCEE, Dr. Estrada served in Boston Public Schools as the Deputy Superintendent of Academic and Student Support for Equity Team (ASSET), which included the offices of the Opportunity and Achievement Gap, English Learner Supports, Special Education Services, Social Emotional Learning and Wellness, and Academics and Professional Learning. A graduate of the Los Angeles Unified School District, Estrada served in multiple roles in the nation's second largest district, including as a special education teacher and area administrator working directly with schools and district leaders in attaining successful educational outcomes for all students, especially students with disabilities and English learners.

Dr. Ricardo (Rocky) Torres, Assistant Superintendent, Seattle Public Schools: As Assistant Superintendent of Student Support Services, Dr. Torres will lead the departments of Advanced Learning, Coordinated Health, 504 Services, Multilingual Services, and Special Education. He has experience leading bilingual, special education, and highly capable services in support of students. He has a deep understanding of the intersectional components of the work for anti-racist practices and has led the special education department in SPS in recognizing how this plays out in decision-making. Dr. Torres, who is bilingual in English and Spanish, began his work in education as a bilingual special education teacher in the New York City Department of Education. He has coached educators and provided professional development sessions with a focus on curriculum, equity, mindset, instruction, and restorative practices. Throughout his career, he has worked with diverse learners. Dr. Torres's experience with labor, school leaders, and community has been essential as Seattle Public Schools continues to implement inclusionary and culturally responsive practices in schools.

Jessica Baldwin, Interim Deputy Chief of Student Services, Cleveland Metropolitan School District (CMSD): In this role, she oversees a number of student-facing supports that are both universal and individualized: social-emotional learning, integrated health, special education, and multilingual/multicultural education. Prior to assuming this role, Jessica served nine years as the Executive Director of Special Education and Intervention Services for CMSD. Jessica believes that CMSD's Post-Pandemic Learning Vision can be realized for every CMSD learner through equitable instructional practices, personalized academic and whole human services, and a commitment to dismantling barriers and ineffective systems. Jessica holds a bachelor's degree in Psychology from Dartmouth College, a master's degree in Special Education from the University of Virginia, and an Education Specialist degree in Educational Leadership at The George Washington University.

Appendix D. About the Council and History of Strategic Support Teams

The Council of the Great City Schools is a coalition of 70 of the nation’s largest urban public-school systems. 105 The organization’s Board of Directors is composed of the superintendent, CEO, or chancellor of schools and one school board member from each member city. An executive committee of 24 individuals, equally divided in number between superintendents and school board members, provides regular oversight of the 501(c)(3) organization. The composition of the organization makes it the only independent national group representing the governing and administrative leadership of urban education and the only association whose sole purpose revolves around urban schooling.

The mission of the Council is to advocate for urban public education and to assist its members in to improve and reform. The Council provides services to its members in the areas of legislation, research, communications, curriculum and instruction, and management. The group also convenes two major conferences each year; conducts studies of urban school conditions and trends; and operates ongoing networks of senior school district managers with responsibilities for areas such as federal programs, operations, finance, personnel, communications, instruction, research, and technology. Finally, the organization informs the nation’s policymakers, the media, and the public of the successes and challenges of schools in the nation’s Great Cities. Urban school leaders from across the country use the organization as a source of information and an umbrella for their joint activities and concerns.

The Council was founded in 1956 and incorporated in 1961 and has its headquarters in Washington, DC. Since the organization’s founding, geographic, ethnic, language, and cultural diversity has typified the Council’s membership and staff. The following table lists the Council’s history of Strategic Support Teams.

City	Area	Year
Albuquerque	Facilities and Roofing	2003
	Human Resources	2003
	Information Technology	2003
	Special Education	2005 & 2018
	Legal Services	2005
	Safety and Security	2007
	Research	2013
	Human Resources	2016
	Special Education	2018
Anchorage	Finance	2004
	Communications	2008
	Math Instruction	2010

	Food Services	2011
	Organizational Structure	2012
	Facilities Operations	2015
	Special Education	2015
	Human Resources	2016
Atlanta		
	Facilities	2009
	Transportation	2010
	Classified Staffing	2019
Aurora		
	Information Technology	2019
Austin		
	Special Education	2010
Baltimore		
	Information Technology	2011
Birmingham		
	Organizational Structure	2007
	Operations	2008
	Facilities	2010
	Human Resources	2014
	Financial Operations	2015
Boston		
	Special Education	2009
	Curriculum & Instruction	2014
	Food Service	2014
	Facilities	2016
Bridgeport		
	Transportation	2012
Broward County (FL)		
	Information Technology	2000
	Food Services	2009
	Transportation	2009
	Information Technology	2012
	Information Technology	2018
	Facilities Operations	2019
Buffalo		
	Superintendent Support	2000
	Organizational Structure	2000
	Curriculum and Instruction	2000

	Personnel	2000
	Facilities and Operations	2000
	Communications	2000
	Finance	2000
	Finance II	2003
	Bilingual Education	2009
	Special Education	2014
	Facilities Operations	2019
Caddo Parish (LA)		
	Facilities	2004
Charleston		
	Special Education	2005
	Transportation	2014
	Finance	2019
Charlotte-Mecklenburg		
	Human Resources	2007
	Organizational Structure	2012
	Transportation	2013
Cincinnati		
	Curriculum and Instruction	2004
	Curriculum and Instruction	2009
	Special Education	2013
Chicago		
	Warehouse Operations	2010
	Special Education I	2011
	Special Education II	2012
	Bilingual Education	2014
Christina (DE)		
	Curriculum and Instruction	2007
Clark County		
	Operations	2019
	Special Education	2019
Cleveland		
	Student Assignments	1999, 2000
	Transportation	2000
	Safety and Security	2000
	Facilities Financing	2000
	Facilities Operations	2000
	Transportation	2004
	Curriculum and Instruction	2005

	Safety and Security	2007
	Safety and Security	2008
	Theme Schools	2009
	Special Education	2017
Columbus		
	Superintendent Support	2001
	Human Resources	2001
	Facilities Financing	2002
	Finance and Treasury	2003
	Budget	2003
	Curriculum and Instruction	2005
	Information Technology	2007
	Food Services	2007
	Human Resources	2020
	Transportation	2020
Dallas		
	Procurement	2007
	Staffing Levels	2009
	Staffing Levels	2016
Dayton		
	Superintendent Support	2001
	Curriculum and Instruction	2001
	Finance	2001
	Communications	2002
	Curriculum and Instruction	2005
	Budget	2005
	Curriculum and Instruction	2008
	Organizational Structure	2017
Denver		
	Superintendent Support	2001
	Personnel	2001
	Curriculum and Instruction	2005
	Bilingual Education	2006
	Curriculum and Instruction	2008
	Common Core Implementation	2014
Des Moines		
	Budget and Finance	2003
	Staffing Levels	2012
	Human Resources	2012

	Special Education	2015
	Bilingual Education	2015
Detroit	Curriculum and Instruction	2002
	Assessment	2002
	Communications	2002
	Curriculum and Assessment	2003
	Communications	2003
	Textbook Procurement	2004
	Food Services	2007
	Curriculum and Instruction	2008
	Facilities	2008
	Finance and Budget	2008
	Information Technology	2008
	Stimulus planning	2009
	Human Resources	2009
	Special Education	2018
East Baton Rouge	Human Resources	2021
	Special Education	2022
	Bilingual Education	2022
El Paso	Information Technology	2019
Fresno	Curriculum and Instruction	2012
	Special Education	2018
Guilford County	Bilingual Education	2002
	Information Technology	2003
	Special Education	2003
	Facilities	2004
	Human Resources	2007
	Transportation	2017
Hawaii	Financial Operations	2019
Hillsborough County	Transportation	2005
	Procurement	2005
	Special Education	2012

Houston	Transportation	2015	
	Facilities Operations	2010	
	Capitol Program	2010	
	Information Technology	2011	
Indianapolis	Procurement	2011	
	Transportation	2007	
	Information Technology	2010	
	Finance and Budget	2013	
Jackson (MS)	Finance	2018	
	Bond Referendum	2006	
	Communications	2009	
	Curriculum and Instruction	2017	
Jacksonville	Organization and Management	2002	
	Operations	2002	
	Human Resources	2002	
	Finance	2002	
	Information Technology	2002	
	Finance	2006	
	Facilities operations	2015	
	Budget and finance	2015	
	Kansas City	Human Resources	2005
		Information Technology	2005
Finance		2005	
Operations		2005	
Purchasing		2006	
Curriculum and Instruction		2006	
Program Implementation		2007	
Stimulus Planning		2009	
Human Resources		2016	
Transportation		2016	
Finance		2016	
Facilities		2016	
Curriculum and Instruction		2016	
Information Technology		2022	

Little Rock	Curriculum and Instruction	2010
Los Angeles	Budget and Finance	2002
	Organizational Structure	2005
	Finance	2005
	Information Technology	2005
	Human Resources	2005
	Business Services	2005
Louisville	Management Information	2005
	Staffing Levels	2009
	Organizational Structure	2018
Memphis	Information Technology	2007
	Special Education	2015
	Food Services	2016
	Procurement	2016
Miami-Dade County	Construction Management	2003
	Food Services	2009
	Transportation	2009
	Maintenance & Operations	2009
	Capital Projects	2009
	Information Technology	2013
Milwaukee	Research and Testing	1999
	Safety and Security	2000
	School Board Support	1999
	Curriculum and Instruction	2006
	Alternative Education	2007
	Human Resources	2009
	Human Resources	2013
	Information Technology	2013
Minneapolis	Curriculum and Instruction	2004
	Finance	2004
	Federal Programs	2004
	Transportation	2016

Nashville	Organizational Structure	2016
	Food Service	2010
	Bilingual Education	2014
	Curriculum and Instruction	2016
Newark		
Curriculum and Instruction	2007	
	Food Service	2008
New Orleans		
	Personnel	2001
	Transportation	2002
	Information Technology	2003
	Hurricane Damage Assessment	2005
	Curriculum and Instruction	2006
New York City		
	Special Education	2008
Norfolk		
	Testing and Assessment	2003
	Curriculum and Instruction	2012
	Transportation	2018
	Finance	2018
	Facilities Operations	2018
Omaha		
	Buildings and Grounds	
	Operations	2015
	Transportation	2016
Orange County		
	Information Technology	2010
Palm Beach County		
	Transportation	2015
	Safety & Security	2018
Philadelphia		
	Curriculum and Instruction	2003
	Federal Programs	2003
	Food Service	2003
	Facilities	2003
	Transportation	2003
	Human Resources	2004

	Budget	2008
	Human Resource	2009
	Special Education	2009
	Transportation	2014
Pittsburgh	Curriculum and Instruction	2019
	Curriculum and Instruction	2005
	Technology	2006
	Finance	2006
	Special Education	2009
	Organizational Structure	2016
	Business Services and Finance	2016
	Curriculum and Instruction	2016
	Research	2016
	Human Resources	2018
	Information Technology	2018
	Facilities Operations	2018
Portland		
	Finance and Budget	2010
	Procurement	2010
	Operations	2010
Prince George’s County		
	Transportation	2012
Providence		
	Business Operations	2001
	MIS and Technology	2001
	Personnel	2001
	Human Resources	2007
	Special Education	2011
	Bilingual Education	2011
	Bilingual Education	2019
Puerto Rico		
	Hurricane Damage Assessment	2017
	Bilingual Education	2019
Reno		
	Facilities Management	2013
	Food Services	2013
	Purchasing	2013
	School Police	2013

	Transportation	2013
	Information Technology	2013
Richmond		
	Transportation	2003
	Curriculum and Instruction	2003
	Federal Programs	2003
	Special Education	2003
	Human Resources	2014
	Financial Operations	2018
Rochester		
	Finance and Technology	2003
	Transportation	2004
	Food Services	2004
	Special Education	2008
	Human Resources	2022
Sacramento		
	Special Education	2016
San Antonio		
	Facilities Operations	2017
	IT Operations	2017
	Transportation	2017
	Food Services	2017
	Human Resource	2018
San Diego		
	Finance	2006
	Food Service	2006
	Transportation	2007
	Procurement	2007
San Francisco		
	Technology	2001
St. Louis		
	Special Education	2003
	Curriculum and Instruction	2004
	Federal Programs	2004
	Textbook Procurement	2004
	Human Resources	2005
St. Paul		
	Special Education	2011
	Transportation	2011

Seattle	Organizational Structure	2017
	Human Resources	2008
	Budget and Finance	2008
	Information Technology	2008
	Bilingual Education	2008
	Transportation	2008
	Capital Projects	2008
	Maintenance and Operations	2008
	Procurement	2008
	Food Services	2008
	Capital Projects	2013
	Transportation	2019
Stockton	Special Education	2019
Toledo	Curriculum and Instruction	2005
Washington, D.C.	Finance and Procurement	1998
	Personnel	1998
	Communications	1998
	Transportation	1998
	Facilities Management	1998
	Special Education	1998
	Legal and General Counsel	1998
	MIS and Technology	1998
	Curriculum and Instruction	2003
	Budget and Finance	2005
	Transportation	2005
	Curriculum and Instruction	2007
	Common Core Implementation	2011
Wichita	Transportation	2009
	Information Technology	2017