



**Chester County Intermediate Unit**

**Reading School District**

**Special Education Program Audit**

**November 2016**

## Reading School District Special Education Program Audit

At the request of the Reading School District, the Chester County Intermediate Unit (CCIU) completed a systemic audit that was comprised of a series of on and off-site activities at the Reading School District in order to review the overall operation and effectiveness of the special education services provided to students with disabilities. Those activities included a comprehensive review of the following components within the special education program:

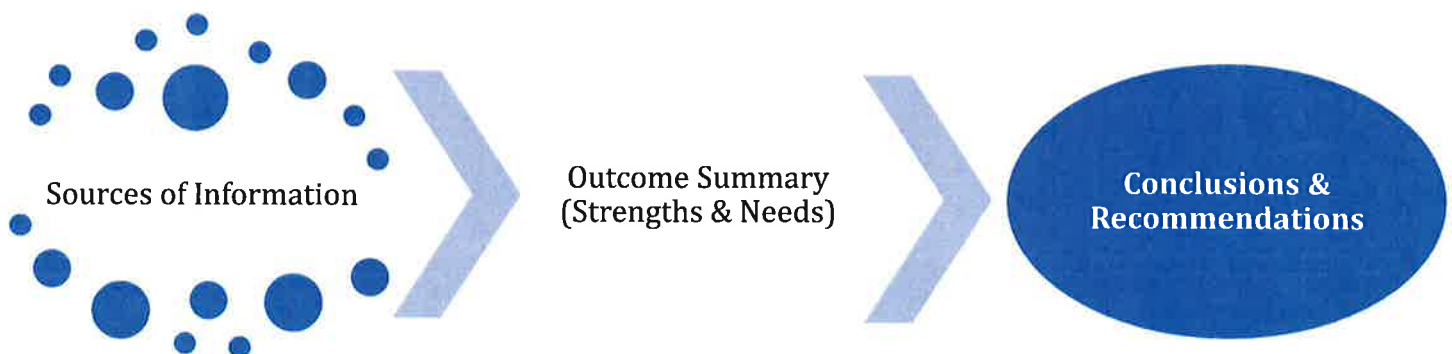
1. Child Find activities (pre-referral interventions, evaluation, etc.)
2. IEP Development, Implementation, and Monitoring
3. Continuum of Services & Special Education Programs
4. Professional Development
5. Special Education Procedures
6. Supervision
7. Qualitative Measures
8. Transportation services

In order to gather information regarding the special education program, the CCIU audit team used the following sources of information:

1. Review of special education procedures
2. Review of student data (eSchoolPLUS/IEPPlus)
3. Review of student records
4. Focus groups/interviews
5. School/classroom observations
6. Student interviews
7. Review of special education litigation

As illustrated in figure 1.1, the CCIU audit team synthesized the quantitative and qualitative data gathered in the audit activities to determine emerging themes that represent the strengths and needs of the Reading School District.

Figure 1.1  
Process of Synthesizing Data



- School/classroom observations
- Staff surveys
- Focus groups/interviews
- Student interviews
- Student data (eSchoolPLUS/IEPPlus)
- Special education procedures
- Student records
- Past special education litigation

### **Focus Groups/Interviews**

A total of 29 focus groups were held between the dates of May 11, 2016 and November 2, 2016. The following stakeholders were interviewed as part of this process:

- School Board
- Parents/Community Members
- Students
- Professional Staff
- Support Staff
- Central Office Administration
- Building Administration

See appendix A for the specific schedule.

The format for the focus groups was consistent across all stakeholders. That format consisted of a review of the special education audit process, the purpose of the focus groups, and the following 3 questions:

- What are the strengths of the special education program?
- What are the weaknesses in the special education program?
- What are the obstacles or barriers to change within the special education program?

As a result of the auditing activities, the following strengths have been identified within the school district. These strengths should be built upon in order to improve the special education processes and programming across the school district:

#### **Strengths:**

- Student strength and resiliency.
- Staff members' strong connection with the students, parents and the community members they serve. Specifically, some staff members are child-centered and willing to go above and beyond their contractual obligations in order to care for their students. Staff members are generally resourceful and maximize limited resources. They are resilient, and supportive of one another.
- An open acknowledgement and awareness across all stakeholders (parents, advocates, students, professional staff, board members, etc.) regarding the needs and the degree of need across the district's special education programs.
- A willingness across all stakeholders (parents, advocates, students, professional staff, board members, etc.) to participate in the audit process by providing an open and honest self-evaluation regarding the special education services offered at Reading School District as well as a shared commitment to work toward positive change.
- Building administrative staff are supportive.
- An emerging high school Life Skills program. There is evidence of collaboration between the high school Life Skills program staff, the BCIU, and building

- administration to develop a comprehensive professional development plan that addresses student assessment, intervention, progress monitoring data collection. The team is working toward shared goals to enhance the program.
- Community partnerships available in every building as part of a student support team that assists students and families such as Olivet Boys and Girls and Parental Outreach Assistance (POA).
  - School-based mental health supports available in each building.
  - Autism programs supported by PaTTAN's Verbal Behavior Project.

As a result of the auditing activities the following areas of improvement have been identified in order to improve the quality of the special education programming across the school district:

**Areas of Improvement:**

1. *The district would benefit from formalized written procedures for operation of the special education program.*

**Recommended action steps:**

- Develop a process for creating, distributing and monitoring special education procedures. Where appropriate, board policies should direct and support the district's written procedures. Careful attention should be paid to how procedures are developed to ensure systematic change. Ideally, the process should address the following:
  - In order to increase "buy in" or support, a committee should be formed to develop the procedures so that the stakeholders responsible for implementing the procedures are represented in their development.
  - At least one member of that team should have intricate knowledge and expertise regarding the legal and regulatory requirements related to that procedure (e.g. special education director and/or legal counsel).
  - New procedures or revised procedures should go through an administrative approval process (This might occur as a matter of course at regularly scheduled administrative meetings).
  - Procedures should be written in easily understood terms. They should be updated in real time and easily accessible to all staff electronically (e.g. shared drive).
  - A designated person within the district should be responsible for making sure staff are notified when new procedures are added and when outdated procedures are removed from the shared drive.
  - Shared supervision and accountability between building and central office administration should occur with regard to the implementation of all procedures.

- Once the procedures are shared and reviewed with staff and appropriate supports are available, administrative staff need to consistently hold professional staff accountable (including progressive discipline if necessary) for implementing the established procedures.
- A lead teacher in the special education department, who receives ongoing training and consultative support from the special education director and/or supervisors should be identified as a site based support for questions and concerns about the procedures.
- Training and review of procedures should be provided at regularly scheduled staff meetings.
- Development of procedures should be created and implemented over time rather than all at once in order to ensure staff understanding and implementation.
- The district will need to prioritize the development of procedures that have a significant impact on the district functioning (e.g. ESY determination, Child Find, etc.). Due to constraints with regard to time and resources, Reading School District should request sample procedures from surrounding districts and Intermediate Units (IU) to expedite the process.
- If there are questions or concerns about an issue, the procedures should be referenced in order to promote consistent and appropriate responding.
- Assign a Lead Teacher with prorated release time to each building. The Lead Teacher will receive intensive and ongoing training in district policies and procedures. They will serve as the first line of implementation to ensure programs and services are compliant and appropriate. Their role will include the following activities:
  - Serve as LEA at IEP meetings.
  - Answer questions/concerns building staff have about special education procedures.
  - Monitor implementation of special education procedures.
  - Train building personnel in existing and new special education procedures.

2. *The district would benefit from improving its use of data reporting systems to allow the district to run reports and make data-based decisions.*

**Recommended action steps:**

- The district should consider contracting a dedicated data specialist familiar with the above systems to oversee the development of procedures, training and implementation of the data systems. The goals or deliverables for this position should include:
  - The development of clear procedures detailing timelines and staff responsible for each activity.
  - Training of special education administrative staff in running regularly scheduled compliance and staff utilization reports so they can monitor

and provide oversight and accountability of the staff in order to ensure procedures are followed and data is entered accurately and timely.

- A professional development plan that addresses new hires. This plan should also include the development of internal capacity to train district staff moving forward.
- Increased IDEA funding.
- Improved efficiency of clerical staff.

3. *The district would benefit from improving special education documentation to improve special education programming across the district.*

1. Develop a comprehensive continuum of services including program models for each disability category served:

**Recommended action steps:**

- Consider a multi-year phase in “teachers on assignment” model to assist in providing specialized supports to the special education program.
- Hire a teacher on assignment to serve as a curriculum specialist to define program models for each disability category to include academic assessments, interventions and progress tools. Under the direction of the designated special education administrator, this person’s role would be to research and propose evidence based assessments, interventions and progress monitoring tools for reading, writing and math. They would participate in the selection and dissemination of materials and they would provide staff development in the form of arranging or providing formal trainings, onsite coaching, and technical assistance. With the support of central office administration, building administration and special education administration, this person would be responsible for monitoring the fidelity of implementation across programs.

Due to the size of the district and the multiple areas in need of support, this person will have to work with the administrative team to develop a long range plan that prioritizes the needs. For example, it may be determined that in year 1, this person will focus on implementing researched-based reading curricula across the elementary learning support classrooms.

- Hire a teacher on assignment or Board Certified Behavior Analyst (BCBA) to serve as a behavior/social skills specialist. Under the direction of the designated special education administrator, this person’s role would be to build staff capacity in completing level 1 functional behavioral assessments (FBAs) and positive behavioral support plans (PBSPs) and research and propose evidence based assessments, interventions and progress monitoring tools for social skills instruction. They would participate in the selection and

dissemination of materials and they would provide staff development in the form of arranging or providing formal trainings, onsite coaching, and technical assistance. With the support of building administration and special education administration, this person would be responsible for monitoring the fidelity of implementation across programs.

Due to the size of the district and the multiple areas in need of support, this person will have to work with the administrative team to develop a long range plan that prioritizes the needs. For example, it may be determined that in year 1, this person will focus on designing universal strategies for managing student behaviors in the elementary emotional support programs as well as implementing a research based social skills program at the high school.

- Hire a teacher on assignment to serve as a transition coordinator. Under the direction of the designated special education administrator, this person's role would be to build staff capacity in completing transition plans for students 14 years or older. They would select assessment tools and provide staff development in the form of arranging or providing formal trainings, onsite coaching, and technical assistance. With the support of building administration and special education administration, this person would be responsible for monitoring quality and compliance with regard to transition services. Additionally, this person would support student participation in enrollment at the technical school, work experience, community based instruction and other transition related activities.

Due to the size of the district and the multiple areas in need of support, this person will have to work with the administrative team to develop a long range plan that prioritizes the needs. For example, it may be determined that in year 1, this person will focus on selecting student transition assessments and writing comprehensive transition plans at the high school.

- Hire a teacher on assignment to serve as an inclusion specialist. Under the direction of the designated special education administrator, this person's role would be to build staff capacity in including students with disabilities with nondisabled peers. They would identify district needs and provide staff development in the form of arranging or providing formal trainings, onsite coaching, and technical assistance. With the support of building administration and special education administration, this person would be responsible for increasing inclusive opportunities for students.

Due to the size of the district and the multiple areas in need of support, this person will have to work with the administrative team to develop a long range plan that prioritizes the needs. For example, it may be determined

that in year 1, this person will focus on developing a co-teaching model for the middle school students.

- Each of these teachers on assignment should be paired with a Training and Consulting (TaC) or professional staff member at the BCIU in order to build capacity. As program enhancements are made within the district's programs, parent training to increase their understanding of services/changes should be built into the implementation plan. The district should consider posting for these positions and recruiting both internally and outside of the district.

The goals or deliverables for these additional positions should include:

- Expanded and more well defined continuum of special education supports available within the district.
- Decreased number of out of district placements.
- Increased number of students being educated in the least restrictive environment (LRE).
- Better ability to maintain students within their home school resulting in:
  - Decreased transportation costs.
  - Increased parent satisfaction.
- Standardized assessments and research based progress monitoring tools across the programs (e.g. elementary learning support). This standardization should result in:
  - Universal understanding of assessment, intervention and progress data between professional staff, building administrators, special education administrators and parents.
  - Increased understanding should also result in greater fidelity of implementation.
- Comprehensive professional development.
  - More efficient training of new or reassigned staff.
- Greater consistency in student programming as they move from class to class or building to building.
- More well-developed and legally defensible reevaluation reports, IEP goals, progress monitoring reports.
- More efficient and comprehensive student review of data resulting in less reevaluations with testing needed by school psychologists.
- More concrete staff expectations and employee accountability.
- Greater capacity to recruit special education administrators from within the organization.

II. Professional development:

Recommended action steps:



- Create a strategic plan that identifies and prioritizes goals for the special education program.
- Align a coordinated professional development plan to the strategic plan and provide meaningful training that supports the district's goals and the professional and paraprofessional staff at Reading School District.
- In addition to the information provided in this document, in order to determine professional development needs/topics:
  - o Survey staff and administrative personnel on a regular basis.
  - o Review of the district's past special education litigation as well as local hearing officer decisions.
  - o Consult with program specialist and BCIU staff.
  - o Review available student performance data.

III. Supervision/accountability:

**Recommended action steps:**

- The special education administrators need to have shared supervisory responsibility with the building administrators.
- Special education administrators should have the authority to establish and monitor program expectations.
- Special education supervisors should work with building principals to develop class schedules in all buildings to ensure that student needs and caseload requirements are met.
- Special education administrators should be held accountable for ensuring employee compliance with the established expectations.
- Special education administrators should be more visible in the building and should be more engaged in the special education processes and programs they supervise.
- Special education administrators should participate in budget development and management of the programs to which they are assigned.

IV. Access to adequate resources:

**Recommended action steps:**

- There should be an established protocol for ordering materials for the special education classrooms and student services.
- Special education administrators should collaborate with administrative staff in budget development and management of the programs to which they are assigned.

4. *Special education administrators are currently viewed as ineffective in providing leadership for the special education programs in the district.*

**Recommended action steps:**

- Clearly define the expectations and roles/responsibilities for all special education positions (supervisors, teachers, paraprofessionals, etc.) including a clear chain of communication that is adhered to by all staff members.
  - Empower supervisors with the authority to allocate resources.
  - Provide special education administrators with shared supervisory responsibility with the building administrators for special education teachers and related service personnel.
  - Require special education supervisors to complete a designated number of walkthroughs and observations as part of their supervisory responsibility.
  - Create a professional development strand for special education supervisors to ensure basic competencies in supervision, including training in laws and regulations governing special education and best practices in programming for students with disabilities.
  - Require special education supervisor participation in the BCIU BASE meetings.
  - Provide mentorship to existing supervisors (consider BCIU support).
  - Hold supervisors accountable for professional conduct emphasizing work output, communications, decision making, and problem solving.
  - Hire a director of special education with significant experience and knowledge in identified areas of need outlined throughout this plan. The district should consider engaging in a long-term contract (3 – 5 years) for the special education director position for the following reasons:
    - o Special education administrative positions are in high demand and the market is extremely competitive for these positions.
    - o The successful candidate will need to have to have significant knowledge, expertise and leadership skills to meet the needs within the Reading School District.
    - o The size, scope, and intensity of the areas of need within the Reading School District will make recruiting a candidate with the necessary prerequisite skills challenging.
5. *The district would benefit from improving pre-referral intervention and Child Find activities.*

**Recommended action steps:**

- The issuance of permissions to evaluate/reevaluate should be moved to the building level. School teams (including the psychologists) should issue and track all permissions to evaluate/reevaluate to ensure accuracy and oversight of the process.
- Psychologists will need to be assigned students in IEPPlus and caseloads/timelines should be monitored by each psychologist as well as a designated special education administrator.
- Standards should be established regarding school psychologist productivity (e.g. how many evaluations, reevaluations, gifted evaluations, etc.) should be completed per day/per week/per year.

- A procedure should be developed that allows the school psychologist to review their caseload with administrative staff and request additional support.
  - The supervisor managing the school psychologist productivity should have the knowledge and expertise to evaluate productivity (e.g. how many evaluations completed/due to be completed), properly weigh the complexity of each case as well as the comprehensiveness of the reports produced.
  - Psychologists, principals, guidance and special education administrators should receive training on how to run reports in IEPPlus including tracking permissions issued, outstanding and completed evaluations, etc.
  - The National Association of School Psychologists recommends a maximum student-to-school psychologist ratio of 1,000-to-1 for the general population. For psychologists providing comprehensive and preventative services such as counseling, behavioral interventions and crisis response, the ratio should not exceed 500 to 700 students per psychologist. However, the national average is 1,653 students per psychologist, with some areas exceeding the recommended ratio by up to 10 times. Reading School District's current ratio is roughly 1 school psychologist to every 1,955 students. Additional school psychologists would benefit the district. The additional staff will be required to:
    - o Manage the existing day to day workflow.
    - o Address existing deficiencies with the evaluations/reevaluations.
    - o Take on the added responsibility of issuing permissions and tracking workflow.
  - Contracts with the BCIU or local staffing agencies should be established to support overflow of assignments.
  - Staffing will need to be reevaluated as appropriate measures are put into place to monitor staff utilization.
6. *The existing staffing pattern and organizational chart should be reviewed and revised as necessary to ensure it supports the district's goal of improving special education services.*

**Recommended action steps:**

- There needs to be clear authority for the lead special education administrator to correct procedural errors as well as identify and implement special education procedures. The organizational chart should reflect that this person has the positional authority to ensure this occurs.
- Create a plan to fill existing special education vacancies.
- Consider, over multiple fiscal years and as in line with strategic planning efforts, staffing positions noted below. Please note that the positions discussed below would need to be phased in, evaluated for effectiveness and adjusted as decisions regarding their effectiveness are made.
  - o Special Education Director = 1.0 FTE.
    - This position is currently vacant.
  - o Special Education Supervisors = 7.0 FTEs.

- There are currently 5.0 FTEs in this role.
      - There is currently 1.0 FTE that is board approved but vacant.
    - School Psychologists = 15.0 FTEs.
      - There are currently 9.0 FTEs.
      - There is currently 1.0 FTE out on medical leave.
    - Lead Teachers = 13.5 FTE (.5 at each elementary and 1.0 at each secondary school).
      - There are currently 19 Lead Teachers/Department Heads.
      - However, the elementary Lead Teachers currently do not have any release time for this role. The district may want to consider reducing the number of lead teachers at the elementary level but offering release time to the professionals serving in this role.
      - The secondary Department Heads have release time.
    - Data Specialist
      - There are 0.0 FTEs in this role.
    - Consider a phase in of Program Specialists = 4.0 FTEs.
      - There are 0.0 FTEs in this role.
  - Strategically assign the special education supervisors and school psychologists to support the achievement of the special education department goals.
  - Reevaluate staffing needs after additional positions have been added. Consider staff utilization and caseloads in the analysis.
  - Track and evaluate the district-wide paraprofessional support.
7. *The district would benefit from improving the formal evaluation system as well as improving systems to hold employees accountable for their professional conduct.*

**Recommended action steps:**

- The district would benefit from special education staff roles and responsibilities being redefined and clearly communicated to all stakeholders. For example, the district would benefit from special education supervisors having responsibility for evaluating special education teachers, developing and managing the special education budget, etc.
- Due to the district experiencing staff turn-over and staff working within multiple roles in the districts, the team should consider a careful balance of:
  - Establishing clearly defined roles and expectations for each position.
  - Assigning resources and training to ensure staff competence and understanding in meeting the established expectations.
  - Establishing a clear process for holding staff accountable and following through on progressive discipline where necessary and appropriate.
  - Training and monitoring staff on meeting supervisory expectations for holding staff accountable for meeting their job expectations.

### **Conclusion**

The comprehensive audit has identified existing strengths to build upon as well as areas in need of improvement. Reading School District is a large urban school system that has intense and complex needs. As indicated in our initial proposal, a committee should be formed to review the identified needs, prioritize goals for the district and to develop a comprehensive long range plan that will address each identified need.

It is important to note that nothing in this report shall be construed to be applied to any individual student or case at Reading School District. While the needs generally apply to the programs across the district, there are several situations where the instructional staff are applying appropriately designed instruction and interventions.

## Appendix A

### Focus Groups

Date:	Name/Department:	Number of Attendees:
5/11/2016	Dr. Khalid Mumin/Superintendent Chris Celmer/ Assistant Superintendent Stella Leonti/Administrator on Assignment	3
6/20/16	Kathy Evison/Chief of SS	1
6/20/16	Beth Liddle/Dir of SS	1
7/18/16	Spec Ed Supervisors	4
7/18/16	Spec Ed Clerks	4
7/18/16	Psych Dept Clerk	1
8/1/16	Interpreters	2
8/1/16	Wanda Crespo/Dir ESL	1
8/1/16	Anne Fisher/Dir of Student Supports	1
8/1/16	Jen Bertolet/Dir of asses/accountability	1
8/1/16	Cynthia Ajemian/Dir of Curr	1
8/3/16	Elem Principals	12 (two groups of 6)
8/3/16	MS Principals	3
8/30/16	RSD School Board	8
9/1/16	Peggy Brown/Principal	1
9/14/16	Advocates	2
9/28/16	Psychologists/Lead Speech	9
9/28/16	REA/Behavior Specialist	3
9/28/16	Advocates	2
9/28/16	Special Education Teachers	10
10/6/2016	Parents	2
10/6/2016	Linda Pauly/Child Accounting	1
10/6/2016	HS Principal	1
10/18/2016	Parents	2
10/19/2016	Parents	3
10/19/2016	Students	5
10/28/2016	Transportation/BCIU	1
10/28/2016	Caitlin Zeiber/PIMS	1
11/2/2016	Karen Gokay/HR Dir	1