

**Garland Independent School District**

**Board of Trustees**

**Special Meeting**

**Tuesday, November 30, 2021**

**Agenda**

**4:00 PM**

- I. Call to Order and Determination of a Quorum
- II. Public Forum: Members of the public who wish to make comments may complete a Public Comment Participation Request in person at Harris Hill Administration Building prior to the start of the meeting indicated in the posting notice. Complaints about student discipline, specific student issues or personnel must be addressed through appropriate administrative channels, in accordance with the Texas Open Meetings Act and Board policy. For more information about public comment procedures, please review the Board Policy for Public Comment accessible at the following link: <https://pol.tasb.org/Policy/Code/364?filter=BED>.
- III. Discussion Items
  - A. Human Resources Audit Review - **Greg Gibson** 2
  - B. Special Education Audit Review - **Dr. Bentley Parker** 36
- IV. Executive Session: Executive session will be held for purposes permitted by Texas Open Meetings Act, Texas Government Code Section 551.001 et seq.
  - A. Pursuant to Texas Government Code Section 551.071, private consultation with the Board's attorney, in person or by phone, when the Board seeks the advice of its attorney about: 1) pending or contemplated litigation; 2) a settlement offer; or 3) on a matter in which the duty of the attorney to the governmental body under the Texas Disciplinary Rules of Professional Conduct of the State Bar of Texas clearly conflicts with this chapter; and Pursuant to Texas Government Code Section 551.074, deliberation regarding the appointment, employment, evaluation, reassignment, duties, discipline, or dismissal of a public officer or employee; or to hear a complaint or charge against an officer or employee:
- V. Reconvene from Executive Session for any possible action relative to items considered during Executive Session
- VI. Adjournment



## Garland Independent School District Board of Trustees

**Date of Meeting:** November 30, 2021

**Agenda Item:** Human Resources Audit Review

**Agenda Section:** Discussion Item

**Administrator Responsible:** Dr. Ricardo López, Superintendent  
Wesley Johnson, Internal Audit Advisory Group Chair  
Greg Gibson, Gibson Consulting

### Board Goal Objective:

#### **OBJECTIVE A: EARLY LITERACY (Reading)**

Percent of students in grade 3 demonstrating early literacy as measured by Meets Grade Level performance on STAAR Reading.

#### **OBJECTIVE C: ENGLISH LANGUAGE ACQUISITION**

Percent of ELL students demonstrating English language acquisition, as measured by yearly progress indicator on the Texas English Language Proficiency Assessment System (TELPAS).

#### **OBJECTIVE D: SCIENTIFIC UNDERSTANDING**

Percent of students in grade 8 demonstrating scientific understanding as measured by Meets Grade Level performance on STAAR Science.

#### **OBJECTIVE E: MATHEMATICAL PROFICIENCY**

Percent of students demonstrating mathematical proficiency as measured by Meets Grade Level performance by the end of grade 9 on STAAR Algebra I EOC.

#### **OBJECTIVE H: STUDENT MANAGEMENT**

Percent of discretionary exclusionary consequences as measured by ISS, OSS, and DAEP.

#### **OBJECTIVE I: GRADUATION OUTCOMES**

Percent of students successfully completing graduation and College, Career, Military Ready (CCM-R) requirements.

### Superintendent's Goal:

#### **Superintendent Goal #1 – Student Results**

Garland ISD will ensure ALL students graduate prepared for college, careers and life by increasing student performance measures, postsecondary readiness, and graduation rates and decreasing student management incidences.

**Superintendent Goal #4 – Educational Leadership**

The superintendent provides leadership and direction for an educational system that is based on desired student achievement.

**Summary/Background Information:**

Gibson Consulting conducted an independent review of the Human Resources Department. The purpose of this agenda item will be to share independent review findings.

**Administrative Recommendations:**

Provided for your consideration and discussion.

# Garland Independent School District Human Resources Department Internal Audit

*Final Report Presentation  
to Board of Trustees*

**GIBSON**

AN EDUCATION CONSULTING & RESEARCH GROUP

November 30, 2021

# Agenda

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- Audit Objectives and Scope
- Summary
- Major Findings and Recommendations
  - Organization and Management
  - Staffing
  - Compensation
  - Employee Relations
- Questions



# Audit Objectives and Scope

# Audit Objectives

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- To evaluate compliance, efficiency, and effectiveness of the GISD Human Resources Department.
- To identify opportunities for improvement for the GISD Human Resources Department.

# Audit Scope

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- **Organization and Management**

- Is the HR Department organized to support accountability for key functions?
- Are Key Performance Indicators (KPIs) used to track performance?
- Are HR business processes efficient?
- Do Standard Operating Procedures (SOPs) exist for key business processes?
- Are personnel records stored in a safe and secure environment?

# Audit Scope

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- **Staffing**

- Do current practices and timelines allow the District to secure a diversified and highly-qualified workforce?
- Is the recruitment strategy linked to workforce and succession planning?
- Do current information systems facilitate fully-automated and efficient business processes?
- Is an online applicant tracking system utilized to facilitate transparency and efficiency in the recruit-to-hire process?

# Audit Scope

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- **Compensation**

- Are salary structures competitive with surrounding and competing districts, and do they remain competitive for effective teachers over time?
- Are there financial incentives for high-performing teachers to take on additional roles and responsibilities?
- Does salary compression or other pay inequities exist?

# Audit Scope

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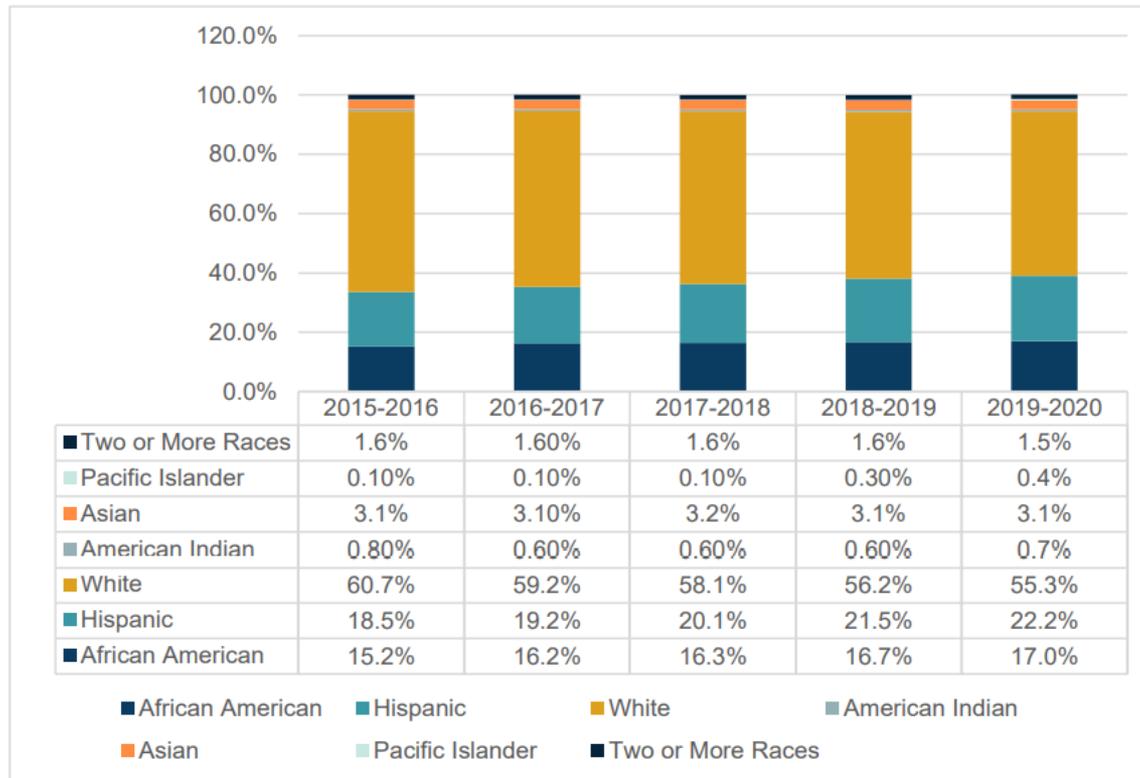
- **Employee Relations**

- Is the employee handbook updated and legally compliant?
- Are procedures for promptly resolving employee complaints and grievances followed?
- Are employee surveys administered to gauge employee job satisfaction and morale?
- Are the District's hotline and investigations yielding results?

# Summary

# Commendation

- GISD has made gains in diversifying its teacher workforce over the last five years.



# Summary

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- Sixteen (16) recommendations:
  - Six (6) Organization and Management
  - Four (4) Staffing
  - Three (3) Compensation
  - Three (3) Employee Relations

# Summary

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- The current organizational chart, a lack of KPIs, and outdated job descriptions hinder accountability in the GISD Human Resources Department.
- GISD's "time-to-hire" lags industry benchmarks, caused in part by underutilized technologies and inefficient processes.
- Pay inequities – such as salary compression and employees being compensated outside of board-approved ranges – exist, partially resulting from the inconsistent application of pay rules.
- Procedures related to employee grievances and investigations have not been sufficiently codified, creating risks and process inefficiencies.

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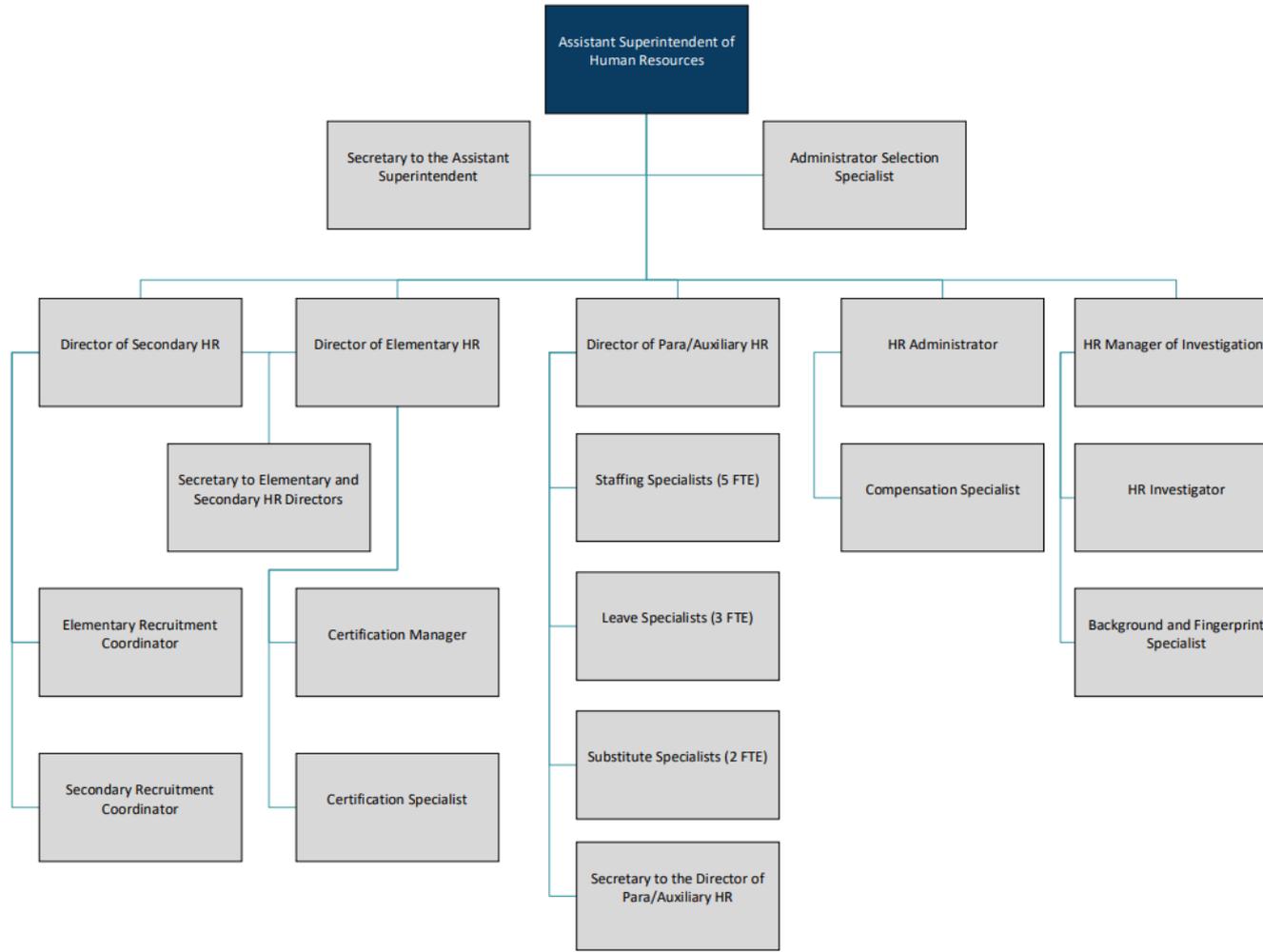
# Organization and Management

# Organizational Structure

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- The current HR Department organizational chart does not represent a logical alignment of major HR functions (school-type vs. functional).
- It also reflects an imbalance in spans of control.
- The current structure does not adequately support accountability for key departmental functions.

# Current Organizational Chart

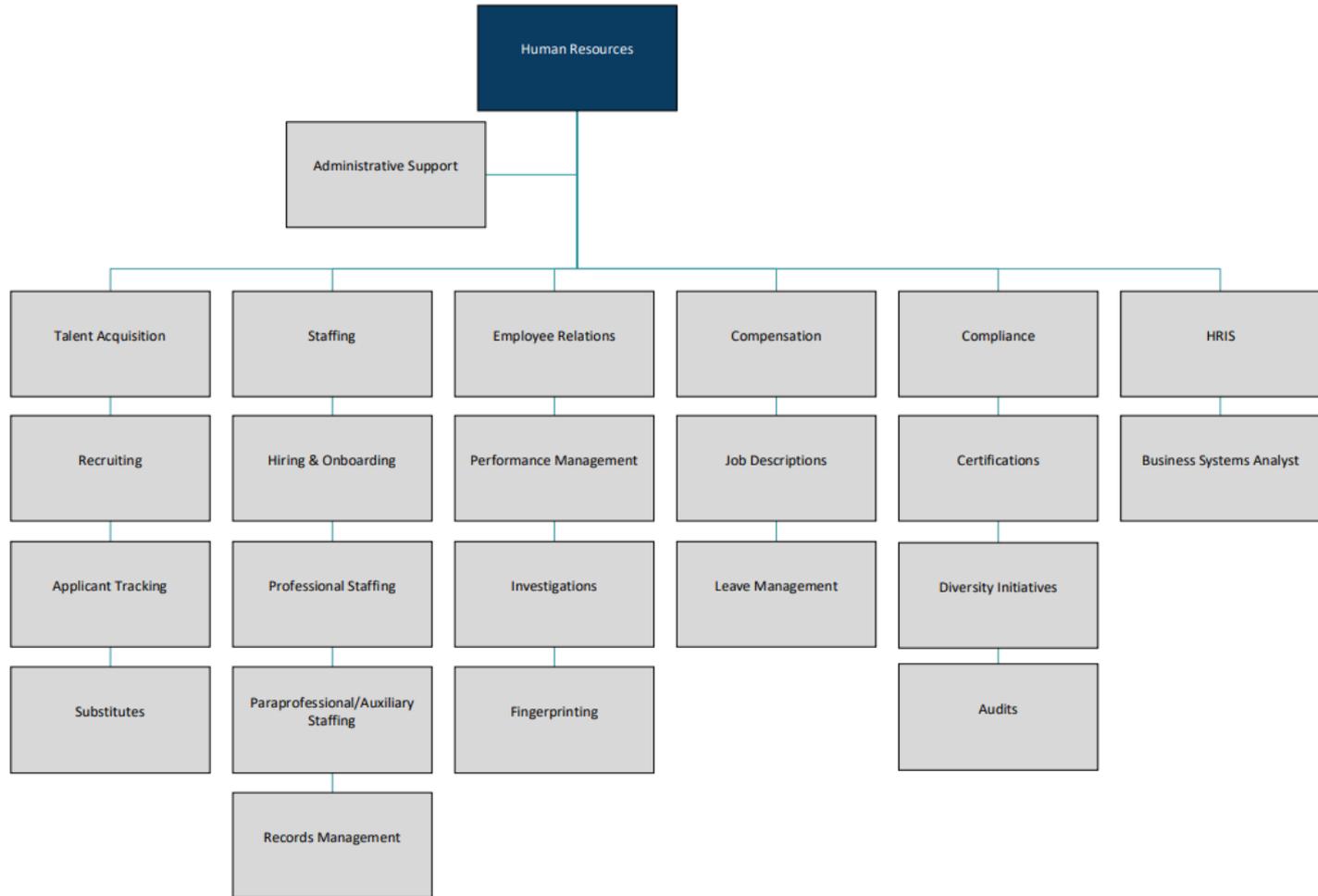


# Organizational Structure

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- **Recommendation: Modify the organizational structure for the Human Resources Department.**
  - New functional alignments:
    - Talent Acquisition
    - Staffing
    - Employee Relations
    - Compensation
    - Compliance
    - HRIS

# Proposed Functional Alignment



# Performance Management

- **Recommendation: Develop Key Performance Indicators for the Human Resources Department.**
  - Outside of a customer feedback survey, the HR Department lacks performance metrics or quantifiable departmental objectives.
  - Possible KPIs to incorporate:

| Function                                    | Efficiency and Effectiveness Indicators and Metrics   |
|---|---|
| Global Performance and Financial Management | <ul style="list-style-type: none"><li>• Student-to-Staff Ratio</li><li>• Student-to-Teacher Ratio</li><li>• Number of District employees per Human Resources FTE</li></ul>                  |
| Recruitment and Hiring                      | <ul style="list-style-type: none"><li>• “Time-to-Hire”</li><li>• Number of employment applications processed per FTE</li></ul>  |
| Employee Satisfaction and Safety            | <ul style="list-style-type: none"><li>• Employee turnover rate, by employee group</li><li>• Number of new employee grievances by level</li><li>• Teacher turnover rate, by campus</li></ul> |
| Compensation                                | <ul style="list-style-type: none"><li>• Rank of average salary, by position type, among peer districts</li></ul>  |

# Job Descriptions

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- **Recommendation: Modify management-level Human Resources job descriptions to include requirements for HR experience and certification.**
  - One position in the HR Department requires prior HR experience in its job description.
  - Job descriptions currently allow for HR experience or school administration experience.
  - This practice broadens the candidate pool, but makes it more difficult to ensure the District is hiring individuals with the proper skills and experience.

# Job Descriptions

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- **Recommendation: Strengthen controls over personnel files to ensure completeness and compliance.**
  - Personnel records are currently being converted from manual/paper files to electronic files.
  - Audit testing showed lack of controls to ensure that required documents are retained in personnel files, exposing the District to unacceptable levels of risk.
  - A file checklist should be implemented and signed by the staff member and supervisor to ensure compliance.
  - Periodic self-audits of files should occur to evaluate improvement.

# Other Recommendations

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- Update all Human Resources job descriptions and implement a regular review process.
- Develop regularly updated status reports for Department improvement initiatives.

# Staffing

# Recruiting

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- **Recommendation: Create a recruitment plan that articulates the District's measurable objectives and overall strategy for achieving them.**
  - The District lacks a recruitment plan and therefore the ability to align recruiting efforts with GISD's strategic needs.
  - A comprehensive recruitment plan should include the following elements:
    - Objectives – what positions do we need to fill?
    - Strategy – what type of candidate and where do we find them?
    - Activities – how do we attract interest?
    - Results – how do we know if we are successful?

# Recruiting

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- **Recommendation: Streamline the Job Requisition (Job Req) and Personnel Action Request (PAR) workflows to support an efficient staffing process at GISD.**
  - The Job Req and PAR workflows were developed in 2012 and include multiple inefficiencies which results in a protracted hiring process.
  - The audit team identified several potential areas for improvement in both workflows.
  - Garland ISD underutilizes its existing information system capabilities.
  - Collaboration with Oracle key to successful improvements.

# Compensation

# Pay Equity

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- **Recommendation: Adjust compensation rates to fall within Board-approved ranges.**
  - More than 100 GISD employees are being compensated outside of Board-approved ranges.
  - Potential causes:
    - Pay guidelines that allow GISD management to offer compensation outside of Board-approved ranges for contracted positions on a case-by-case basis.
    - Outdated job descriptions that complicate the classification process.
    - The absence of internal controls that would identify pay levels outside of Board-approved ranges.

# Other Recommendations

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- Address salary compression through refinement of District-developed pay rules and guidelines.
- Implement an annual reconciliation process for all District stipends.

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# Employee Relations

# Employee Grievances

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- **Recommendation: Create a Standard Operating Procedure for the employee grievance process.**
  - Inconsistencies and a lack of clarity in the submission, tracking, reporting, and outcomes of employee grievances create risk for the District as well as duplicated efforts among management.
  - **An effective SOP should include the following:**
    - Where do employees access the grievance form? How do they submit it? Is this step in the process widely publicized and consistent across documents?
    - Who is responsible for grievance form intake? What is the process for collecting and consolidating email and hardcopy forms?
    - How is employee privacy protected throughout the process?

# Employee Grievances

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- Which positions need to be involved at Level 1? Level 2? Who is responsible for grievance form intake? What is the process for collecting and consolidating email and hardcopy forms?
- How does the process support lower-level administrators in resolving complaints prior to their becoming formal grievances?
- Applying the RACI responsibility matrix – which positions are “Responsible”? “Accountable”? “Consulted”? “Informed”?
- Do job descriptions accurately reflect administrator responsibilities related to employee grievances?

# Investigations

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- **Recommendation: Upgrade the District's investigative protocols to reflect industry standards and best practices.**
  - The audit team's work identified several control weaknesses in internal investigations, likely due to a lack of codified protocols:
    - Investigations are not consistently recorded.
    - The Investigations Tracker has data integrity issues.
    - Administrators have often assigned leave to an employee who is the subject of an investigation prior to a police interview.
    - The District's final determinations are inconsistent across investigations.
    - Direct managers are often not informed of updates in the investigative process.



Questions?



## Garland Independent School District Board of Trustees

**Date of Meeting:** November 30, 2021

**Agenda Item:** Special Education Audit Review

**Agenda Section:** Discussion Item

**Administrator Responsible:** Dr. Bentley Parker  
Interim Executive Director Special Education

### **Board Goal Objective:**

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### **Superintendent's Goal:**

#### **Superintendent Goal #1 – Student Results**

Garland ISD will ensure ALL students graduate prepared for college, careers and life by increasing student performance measures, postsecondary readiness, and graduation rates and decreasing student management incidences.

## **Superintendent Goal #4 – Educational Leadership**

The superintendent provides leadership and direction for an educational system that is based on desired student achievement.

### **Summary/Background Information:**

In January 2021, Garland Independent School District (GISD) selected Public Consulting Group, Inc. (PCG) to conduct an independent review of its special education services. The purpose of this agenda item will be to share independent review findings. This report describes the current state of the special education program in GISD. Using information gleaned from the report, district leaders will share our initial steps to addressing the independent review findings intended to guide the district toward continuous improvement.

### **Administrative Recommendations:**

Provided for your consideration and discussion.

# *Memo*

To: GISD School Board Trustees

From: Dr. Bentley L. Parker

CC: Dr. Ricardo Lopez, GISD Superintendent

Dr. Susanna Russell , GISD Chief Academics & Leadership Officer

Date: Nov 30, 2021

Subject: Special education Audit Review

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In January 2021, Garland Independent School District (GISD) selected Public Consulting Group, Inc. (PCG) to conduct an independent review of its special education services. This report describes the current state of the special education program in GISD and is designed to guide the district toward continuous improvement.

The study examined the following guiding questions:

1. To what extent does GISD implement a rigorous process to systematically monitor the educational benefit of special education services to students? How do Individualized Education Program (IEP) teams determine services and placement?
2. How is the district's continuum of services organized to support FAPE? To what degree do students with disabilities have access to the general education curriculum? How are inclusive practices employed?
3. How does GISD organize its leadership to support special education? How has GISD's school and district leadership fostered a culture that is focused on improving outcomes and post-secondary preparation and communicated priorities?
4. To what extent are parents of children receiving special education services satisfied with their experiences, specifically in the eligibility and IEP process, participation in their child's educational program, and their child's participation in school and progress?

*Memo - page 2*

5. To what extent does GISD organize and utilize its human capital resources to provide adequate services for students with disabilities to support student learning outcomes?
  
6. Does GISD allocate resources in a way that facilitates maximum return on district investment?

The recommendations in this report focus on priority areas that emerged from the data collection and include action steps to support overall planning in support of increased access for students with disabilities to high-quality instructional programming.

# Special Education Program Review

Findings and Recommendations

Presentation to the Board of Trustees

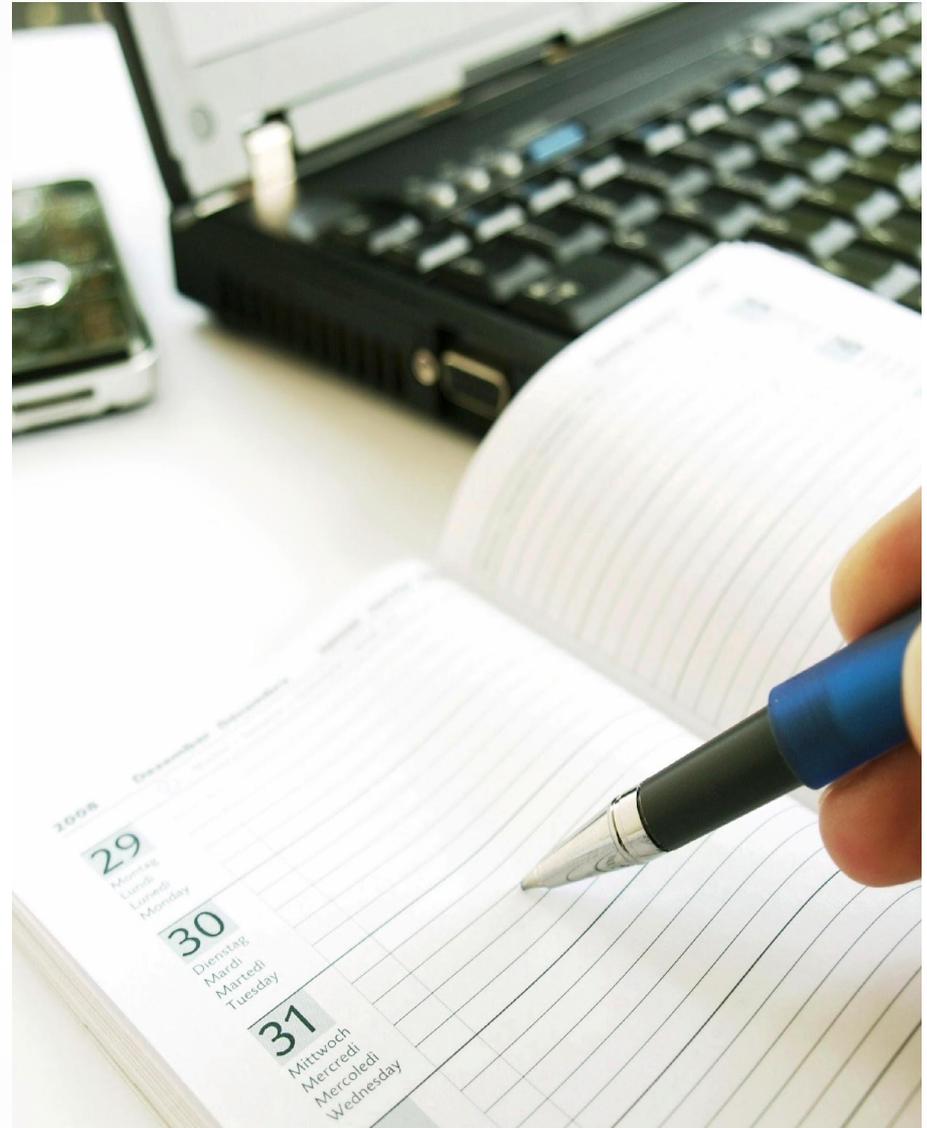
Garland Independent School District

November 30, 2021

Public Consulting Group

# Agenda

- I. Introduction
- II. Special Education Review Approach
- III. Data Context and Root Causes
- IV. Recommendations
- V. Call to Action



# I. Introduction

# What is the Individuals with Disabilities Education Act (IDEA)?

## At its core, IDEA is a civil rights law.

- Federal statute governing the education of students with disabilities and related services.
- Ensures public schools serve the educational needs of students with disabilities by providing them with special education services.
- Guarantees a free appropriate public education (FAPE) to these students.
- Ensures that the unique needs of students with disabilities are met as they are prepared for higher education, employment, and independent living.



# Raising the Standard: *Rowley* and *Endrew F.* Supreme Court Decisions

## *Rowley* (1982)

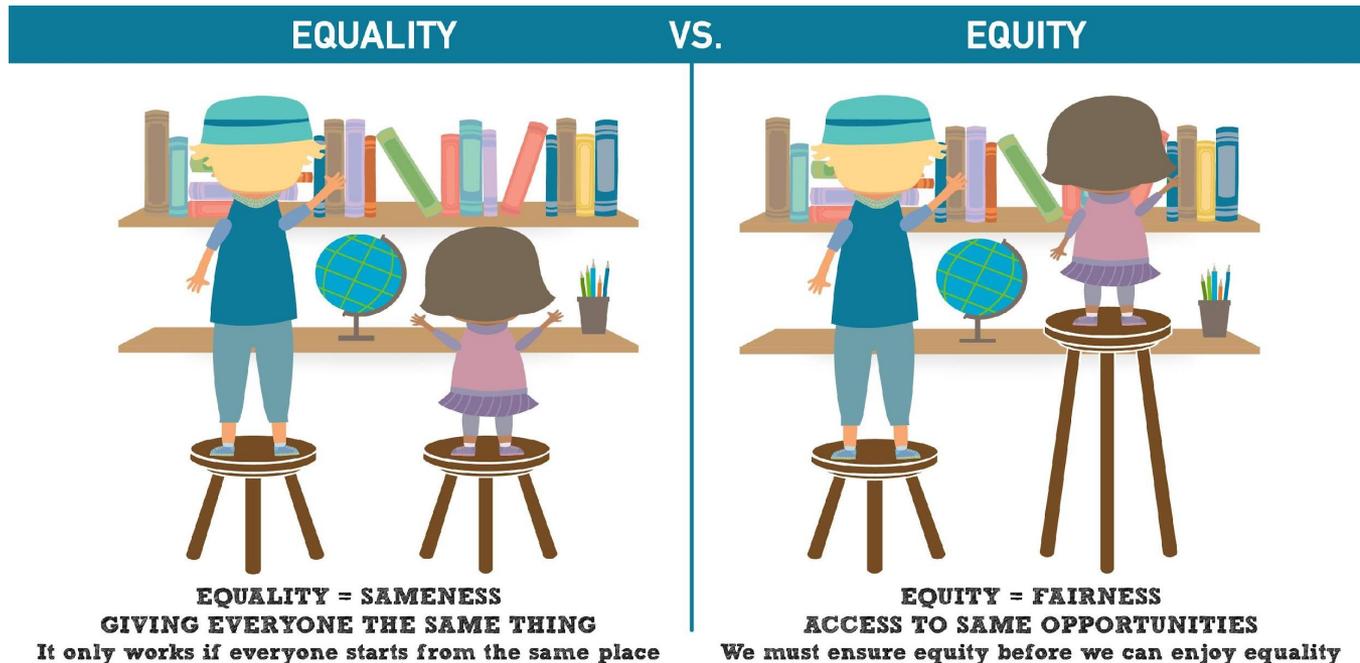
- Enshrined the term '**de minimis**' education - what is required from school districts serving students with disabilities.
- Ruled that IDEA's intent is to give students equal and sufficient access to a free and appropriate public education (FAPE).

## *Endrew F.* (2017)

- Set a new standard - schools must demonstrate '**meaningful progress**' and '**appropriately ambitious**' goals for students with disabilities.



# Special Education and Equity



It is time for all educators to move away from terms such as ‘de minimis’ education, compliance, and equality, towards a present and future that includes the vernacular of *maximization*, *personalization*, and *equity*.

-Dr. Kurt Hulett

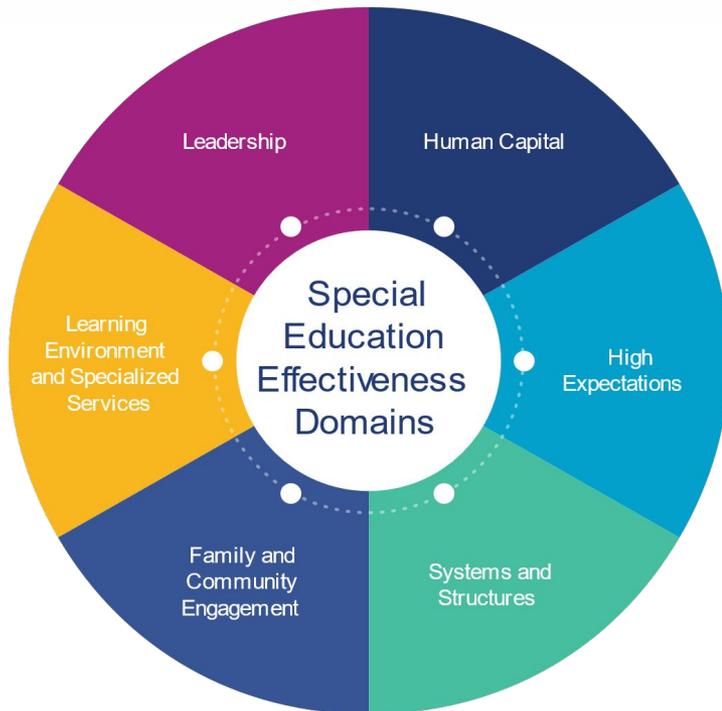
## **II. Special Education Review Approach**

# Methodology

- Mixed-methods study
- Multidimensional
- Broad range of stakeholders
- Questions and protocols designed in collaboration with GISD to ensure aligned with:
  - District's areas of focus
  - Best practices literature
- **74 virtual focus groups and interviews**, 300+ participants,
- **8 virtual student file review focus groups**, 45+ participants,
- Reviewed of over 50 **district documents** and data trend analysis
- **Parent survey**, 736 parents completed, 14% response rate.



# PCG's Special Education Effectiveness Domains



- **Human Capital** – *Investing in people from recruitment to retirement*
- **High Expectations** – *Increasing expectations of students with disabilities by presuming competence*
- **Systems and Structures** – *Defining expectations for service delivery, resource allocation, and data management infrastructure to guide data-driven decisions*
- **Family and Community Engagement** – *Coordinating efforts with families and community organizations to improve results*
- **Learning Environment and Specialized Services** – *Delivering instruction and interventions within an inclusionary framework and IEP fidelity*
- **Leadership** – *Embracing partnerships to make informed decisions and provide equitable opportunities for all students*

## KEY STRENGTHS

- The Superintendent and Board of Trustees have prioritized the improvement of special education services district-wide.
- Intersession is widely viewed as a positive approach to supporting all students with intervention and enrichment.
- Special education department staff are seen as knowledgeable and supportive to campuses.
- A robust list of topics covering most components of special education service delivery were held for campus leaders in 2020-21.



## KEY STRENGTHS

- GISD uses multiple modes of communication for sharing information with parents.
- There are caring, concerned teachers and paraprofessionals who express commitment to establishing connections with parents.
- The Department of Special Education has collaborated with the Budget Department to improve budget monitoring practices.
- The district has written guidance for Multi-Tiered Systems for Support (MTSS) and special education.

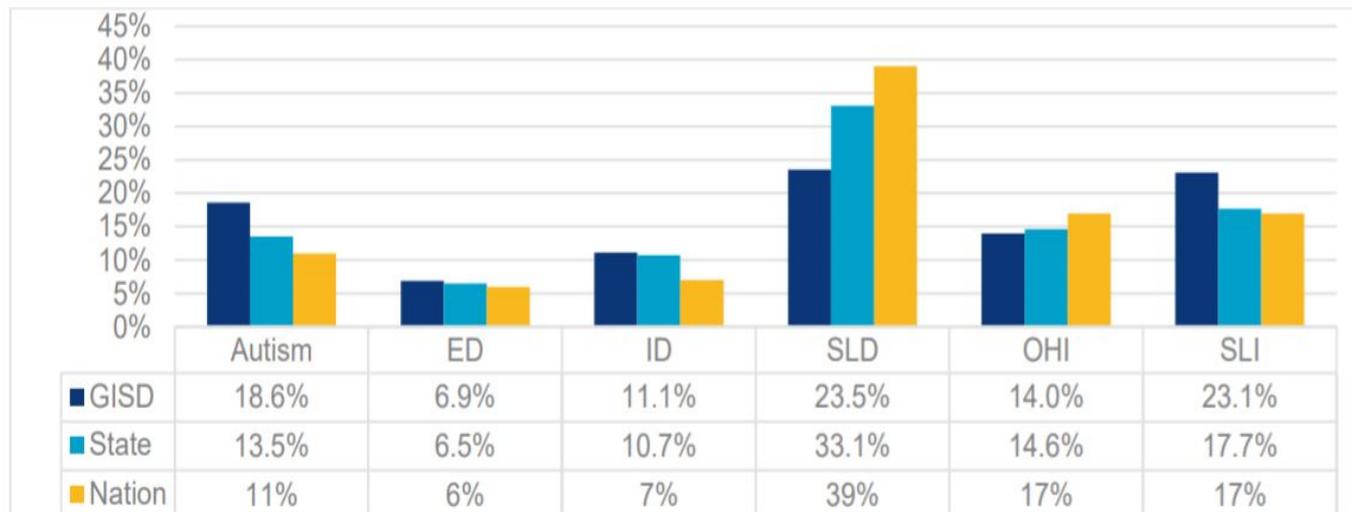


# III. Data Context and Root Causes

# Special Education Incidence Rates

- In 2019-20, 9.9 percent of all GISD students 6 through 21 years of age received special education pursuant to an IEP, compared to the 10.7 percent state average.
  - The last national data from 2018-19 reported that 14.0 percent of all public-school students had an IEP, a rate that was substantially higher than the GISD and Texas figures.
- In 2019-20, GISD averages by disability varied, with higher rates of AUT and SLI and a lower rate of SLD than state and national averages.

Exhibit 2. Composition of Identified Students by Disability Category for GISD, State and Nation



# Disproportionality - Overall

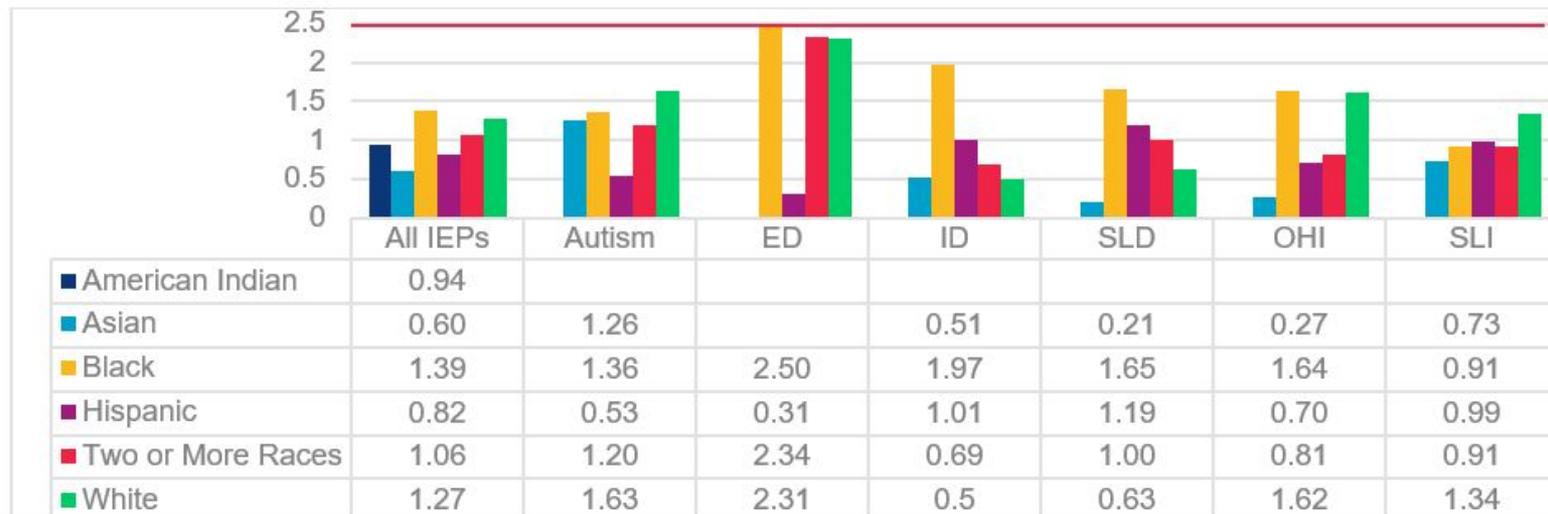
- No racial/ethnic group had a risk ratio for overall special education identification above 1.42 (Black students).
- However, students of color are disproportionately overidentified in:
  - certain **disability classifications**,
  - **more restrictive settings**,
  - harsher **behavioral consequences**,
  - and **economically disadvantaged** status.



# Disproportionality – Identification Rates

- GISD Black students are 2.5 times more likely than non-Black students to be identified with an emotional disturbance (ED).
- By comparison, Black students nationally are 1.30 times more likely than non-Black students to be identified with an ED.

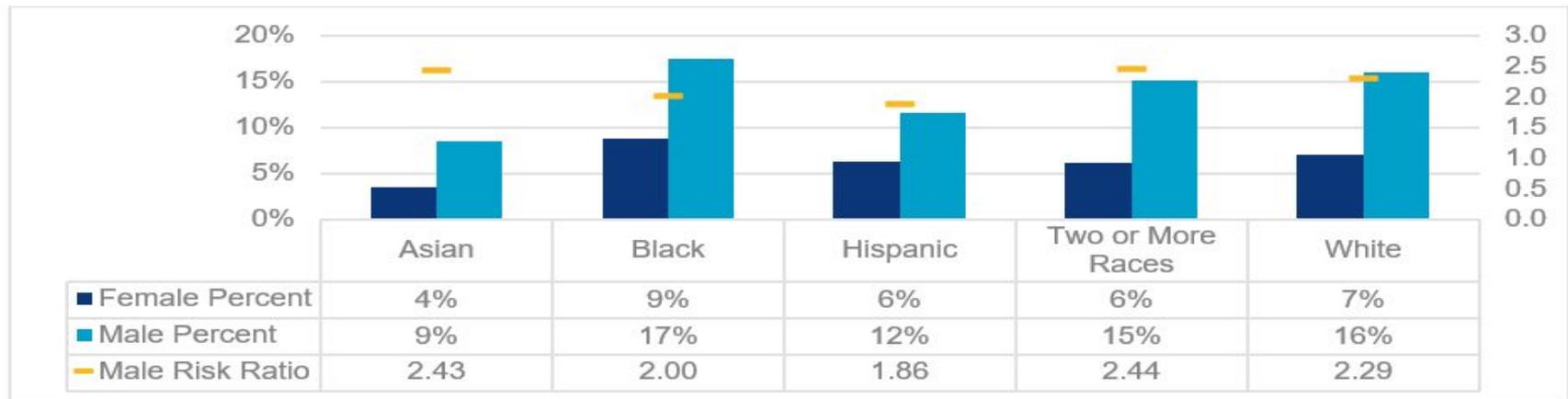
Exhibit 8. Risk Ratios by All Disabilities and Six Disabilities Based on Race/Ethnicity



# Disproportionality – Identification Rates

- In each racial/ethnic group (except Hispanic), GISD males were twice more likely than females to be identified.

**Exhibit 10. Of Each GISD Enrolled Racial/Ethnic Groups, Percent of GISD Male and Females with IEPs, and Male Risk Ratios**



# Disproportionality – Identification Rates

- Male/female race/ethnic disparities are more pronounced when also considering primary disability.
- Male risk ratios were approaching or higher than 2.0 for the following disability and racial/ethnic groups. In other words, male students in the areas listed below were about or more than twice as likely than females to be identified for a disability category.

Exhibit 11. Male Risk Ratios by Race/Ethnicity and Disability



# Disproportionality – Educational Settings

- Overall, no GISD racial/ethnic student group was more likely than others to learn in a restrictive placement.
- However, when looking at disability and educational setting, Black students identified with an ED were 3.72 times more likely than non-Black students to learn in specialized classes (i.e., general education less than 40% of the time environment.)

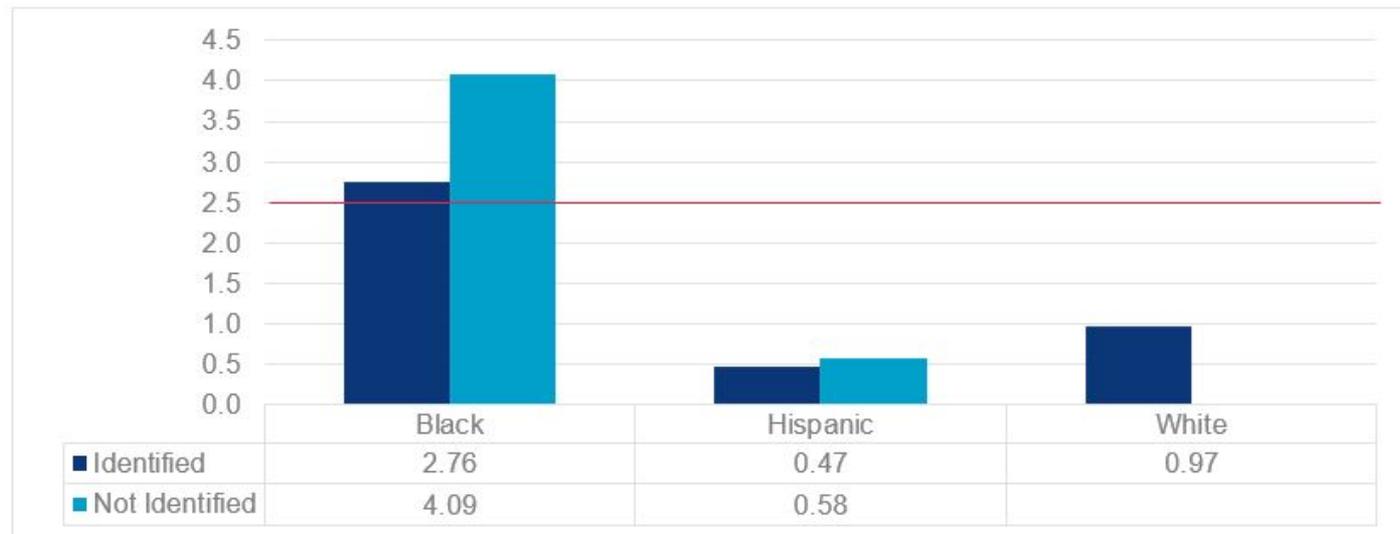
Exhibit 34. Risk Ratios for Most Restrictive Educational Settings by Disability Category and Race/Ethnicity



# Disproportionality – Suspension Rates

- Black students identified for special education were 2.76 times more likely than non-Black identified students to be suspended.
- With a risk ratio of 4.09, the likelihood was higher for Black students not identified for special education to be suspended compared to identified Black students (2.76 risk ratio).

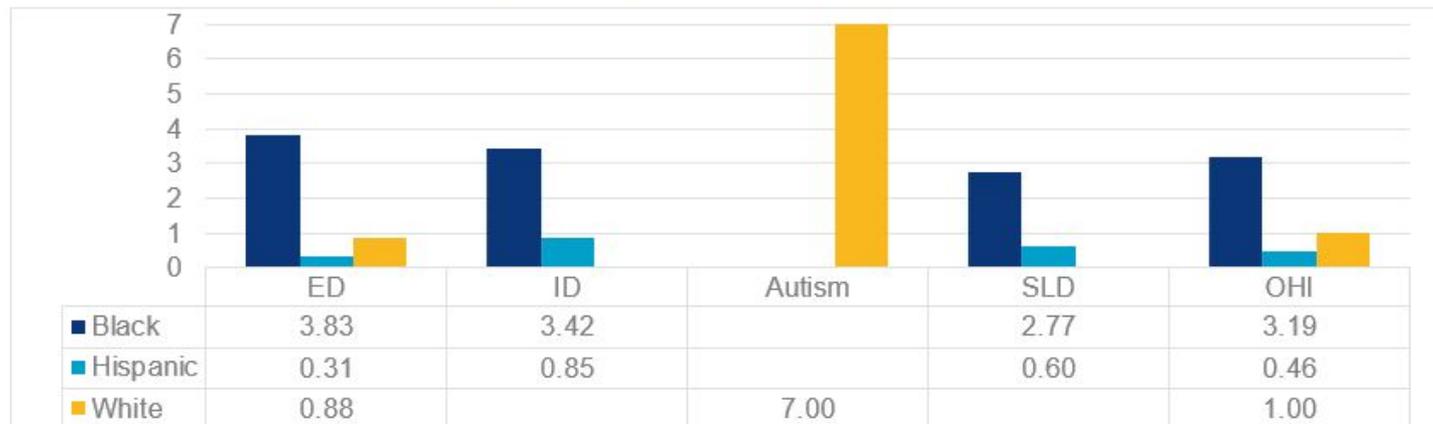
Exhibit 63. Suspension Risk Ratios based on Special Education Status and Race/Ethnicity



# Disproportionality – Suspension Rates

- Black students were more likely than non-Black students to be suspended in four disability areas: emotional disturbance (3.83 risk ratio), intellectual disability (3.42 risk ratio), specific learning disability (2.77 risk ratio), and other health impairment (3.19 risk ratio).
- White students with autism were 7.0 times more likely than non-White students to be suspended.

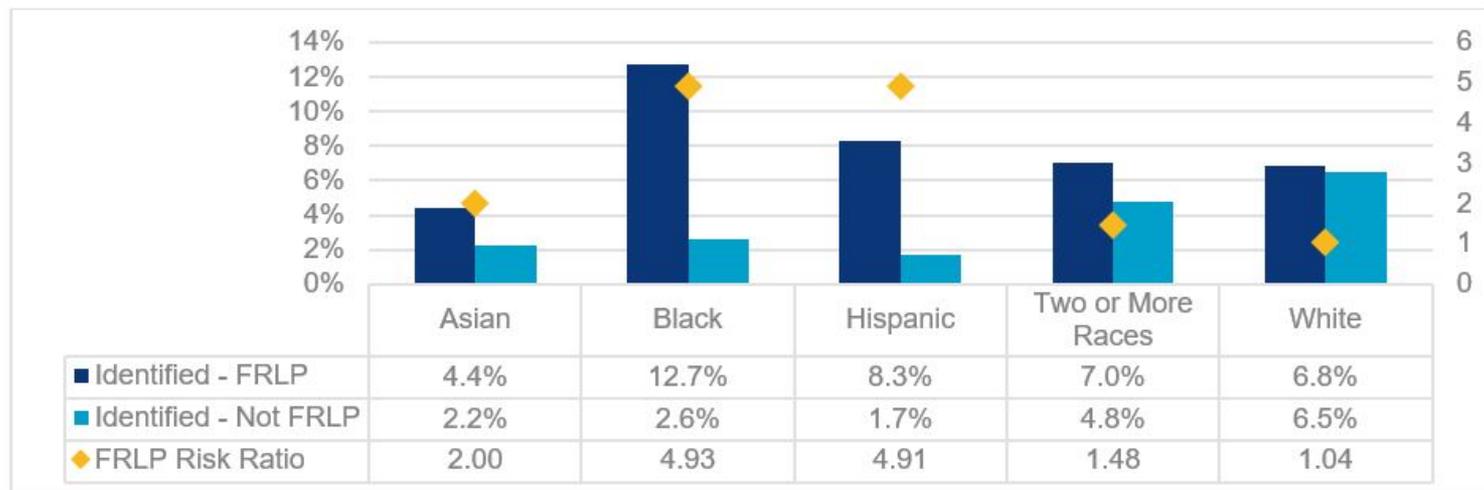
Exhibit 64. Suspension Risk Ratios by Disability and Race/Ethnicity



# Disproportionality – Economically Disadvantaged (Free/Reduced Lunch Program)

- Overall, students with IEPs were 3.1 times more likely than all GISD students to be enrolled in the FRLP.
- Based on all GISD students by race/ethnicity, students with IEPs who were Black (4.93 RR), Hispanic (4.91 RR), and Asian (2.0 RR) students were much more likely than not to be enrolled in the FRLP.

Exhibit 12. Identification Rates by FRLP Status and Race/Ethnicity and FRLP to Not FRLP Risk Ratios



# State Performance Plan Indicators

| Indicators                           |  | GISD Rate | TEA Target | GISD Met Target |
|--------------------------------------|--|-----------|------------|-----------------|
| Exit From High School                | 1. Graduation  | 77.3%     | 88.5%      | No              |
|                                      | 2. Dropout   | 1.3%      | 1.8%       | Yes             |
| Statewide Assessments                | 3B. Statewide assessment participation rate - Reading  | 97.4%     | 95%        | Yes             |
|                                      | 3B. Statewide assessment participation rate - Math   | 98.6%     | 95%        | Yes             |
|                                      | 3C. Statewide assessment proficiency rate - Reading  | 20.1%     | 98%        | No              |
|                                      | 3C. Statewide assessment proficiency rate - Math   | 23.9%     | 98%        | No              |
| Out of School Suspensions            | 4A. Suspension >10 days /expulsion overall   | N/A       | 0.0%       | N/A             |
|                                      | 4B. Suspension > 10 days/expulsion by race/ethnicity (compliant procedures)  | N/A       | 0.0%       | N/A             |
| Educational Environments (ages 6-21) | 5A. Inside regular class 80% or more of the day  | 66.4%     | 68.0%      | No              |
|                                      | 5B. Inside regular class less than 40% of the day  | 16.1%     | 12.0%      | No              |
|                                      | 5C. Separate schools, residential facilities, or homebound/ hospital placements                                      | 1.7%      | 1.3%       | No              |
| Educational Environments (ages 3-5)  | 6A. Regular early childhood program  | 34.7%     | 33.0%      | Yes             |
|                                      | 6B. Separate special education class, separate school, or residential facility                                       | 18.8%     | 15.0%      | No              |
| Early Childhood Outcomes             | 7A. Positive social/emotional skills: substantially increased skills   | 87.2%     | 85%        | Yes             |
|                                      | 7A. Areas above: functioning within age expectations   | 55.3%     | 63%        | No              |
|                                      | 7B. Acquisition/use of knowledge/ skills: substantially increased skills   | 85.2%     | 85%        | Yes             |
|                                      | 7B. Areas above: functioning within age expectations   | 55.3%     | 58%        | No              |
|                                      | 7C. Use of appropriate behaviors to meet needs: substantially increased skills                                       | 86.5%     | 85%        | Yes             |
|                                      | 7C. Areas above: functioning within age expectations   | 69.3%     | 74%        | No              |
| Parent Involvement                   | 8. Parent Involvement  | N/A       | 81%        | N/A             |
| Disproportionality Race/Ethnicity    | 9. Disproportionality by race/ethnicity: result of inappropriate identification                                      | N/A       | 0.0%       | Yes             |
|                                      | 10. Disproportionality by race or ethnicity in specific disability categories result of inappropriate identification | N/A       | 0.0%       | Yes             |
| Child Find                           | 11. Child find   | 100%      | 100%       | Yes             |
| Transition                           | 12. Early childhood transition   | 100%      | 100%       | Yes             |
|                                      | 13. Secondary transition   | 100%      | 100%       | Yes             |
| Post-School Outcomes                 | 14A. Enrolled in higher education  | N/A       | 30%        | N/A             |
|                                      | 14B. Same as 14A, or competitively employed  | N/A       | 63%        | N/A             |
|                                      | 14C. Same as 14B, or in some other postsecondary program   | N/A       | 80%        | N/A             |



# Root Causes

1. Identification and Support of Struggling Learners
2. Continuum of Services and Specially Designed Instruction (SDI)
3. Adherence to Intent and Spirit of IDEA
4. Inclusivity
5. Leadership and Staffing
6. School Leaders' Voice
7. Establishing Systems and Practices to Promote Accountability
8. Facilities and Resource Allocation
9. Resources to Address Behavior and Mental Health Concerns
10. Family Engagement Vision



# IV. Recommendations

# Recommendations



## Learning Environment and Specialized Services

Delivering instruction and interventions within an inclusionary framework and with IEP fidelity, leading to increased access and progress in grade-level learning standards and reducing disproportionality

1. Multi-Tiered System of Supports
2. Identification Practices and Disproportionality Monitoring
3. IEP Development
4. Continuum of Services and Specially Designed Instruction
5. Expanding the LRE Continuum
6. Inclusive Practices Planning, Guidance, and Implementation



## Leadership

Supporting students with disabilities (including increased collaboration and ownership of school administrators and staff) and coordinating efforts with community organizations to improve results

7. Elevate Rigor



# Recommendations



## High Expectations

Increasing expectations of students with disabilities by presuming competence and incorporating culturally relevant, growth-oriented practices

8. Adherence to Intent and Spirit of IDEA
9. School Leader's Voices



## Human Capital

Investing in people from recruitment to retirement to ensure highly qualified and effective staff have the skills/training needed to provide services and support to promote the success of diverse learners

10. Expanding the Roles of Mental Health Practitioners in GISD
11. Systematic, Districtwide Approach to Professional Development



# Recommendations



## Systems and Structures

Defining expectations for service delivery, resource allocation, and data management infrastructure to guide data-driven decisions

12. Special Education Policy and Procedure Manual
13. Facilities Planning
14. Special Education Organizational Structure



## Family and Community Engagement

Embracing partnerships to make informed decisions and provide equitable opportunities for all students

15. Family Engagement Vision
16. Parent trainings
17. Family Friendly Guides

# V. Call to Action



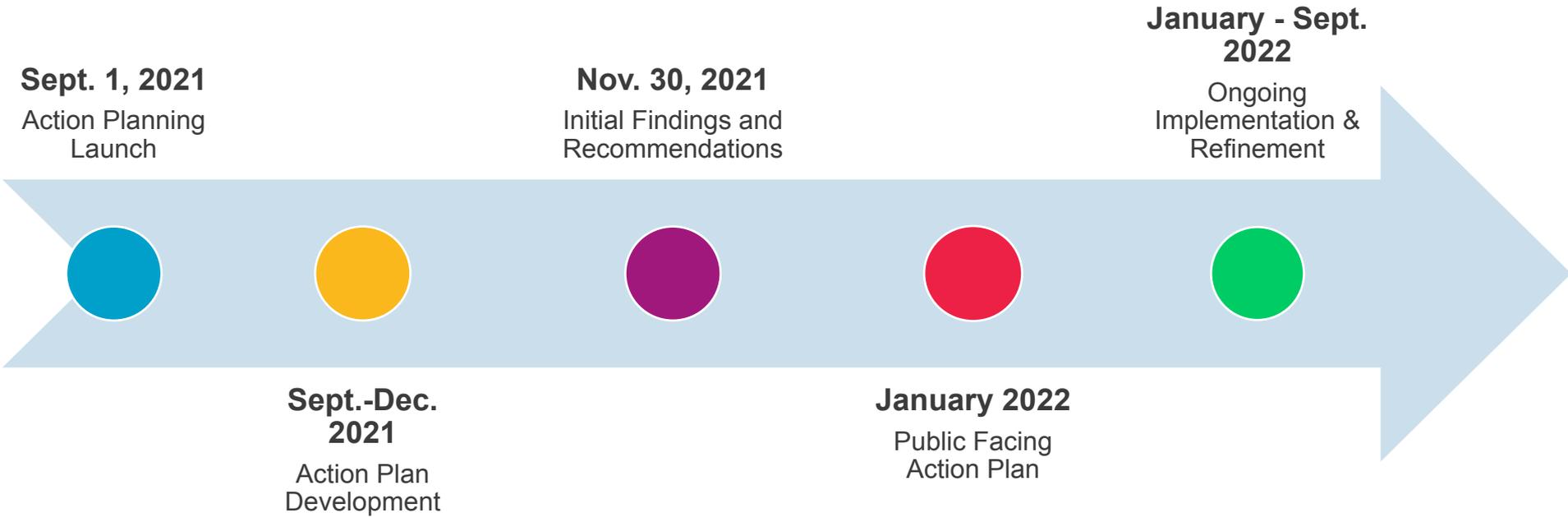
*To PCG, a review is not just about identifying the challenges and offering recommendations - it's about creating an intentional, ambitious, and urgent path forward for the Garland community to improve the outcomes of students with disabilities. This is a call to action.*

# Call to Action and Timeline

- With a **sense of urgency** and an **unrelenting commitment** to implementing the recommendations in this report with fidelity, GISD has the opportunity to dramatically improve special education services across its campuses.
- Enacting change requires **focus**, a **strong vision** from the superintendent and enacted by senior leadership staff, an **appropriate allocation of resources**, **mandated professional development**, and clear, non-negotiable, **division-wide accountability measures**.
- Reform requires the involvement and **commitment of every staff person** and a willingness to establish high expectations for students with disabilities.



# Year 1 Implementation Timeline (2021-2022)



# Special Education Review

## Garland Independent School District

September 2021  
Final Report

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**PUBLIC**  
CONSULTING GROUP

Garland Independent School District  
Special Education Review  
September 2021

### *Acknowledgments*

The PCG team thanks the many individuals who contributed to this special education review for GISD. Their efforts were critical to our ability to obtain a broad and detailed understanding of the system so that we could present the best possible roadmap for improving special education and related services for GISD's students. This review would not have been possible without the support of Dr. Ricardo López, Superintendent, Dr. Jovan Wells, former Chief Academic Officer, Melissa Roberson, former Executive Director of Special Education, and Dr. Bentley Parker, Interim Executive Director of Special Education, in addition to the Board of Trustees and other members of the senior leadership team and special education department staff.

The project team organized all components of the data collection efforts, provided all the documents and data we needed to do our work, and organized the logistics for our data collection activities. Their commitment to continuing with this review during a pandemic and with many other competing priorities was admirable.

PCG also thanks the many GISD staff members with whom we met. Their commitment to the work they do for students each day was evident through their comments, and we appreciated their willingness to speak with us virtually during such a challenging time.

Public Consulting Group, LLC

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# I. INTRODUCTION

## Purpose of the Study

In January 2021, Garland Independent School District (GISD) selected Public Consulting Group, Inc. (PCG) to conduct an independent review of its special education services. This report describes the current state of the special education program in GISD and is designed to guide the district toward continuous improvement.

The study examined the following guiding questions:

1. To what extent does GISD implement a rigorous process to systematically monitor the **educational benefit** of special education services to students? How do Individualized Education Program (IEP) teams determine **services** and **placement**?
2. How is the district's **continuum of services organized to support FAPE**? To what degree do students with disabilities have **access** to the general education curriculum? How are **inclusive practices** employed?
3. How does GISD organize its **leadership to support special education**? How has GISD's school and district leadership fostered a culture that is focused on **improving outcomes** and **post-secondary preparation** and communicated priorities?
4. To what extent are **parents** of children receiving special education services satisfied with their experiences, specifically in the eligibility and IEP process, participation in their child's educational program, and their child's participation in school and progress?
5. To what extent does GISD organize and utilize its **human capital resources** to provide adequate services for students with disabilities to support student learning outcomes?
6. Does GISD **allocate resources** in a way that facilitates maximum return on district investment?

The recommendations in this report focus on priority areas that emerged from the data collection and include action steps to support overall planning in support of increased access for students with disabilities to high-quality instructional programming.

## Methodology

Over the course of the 2020-21 school year, PCG conducted a mixed-methods study of the special education program in GISD. The findings and recommendations related to programs, policies, and practices resulted from a comprehensive analysis of several data sources. Sources included **1) Data and Document Analysis, 2) Focus Groups and Interviews, 3) Student File Review Focus Groups, and 4) a Parent Survey**. These components drew from **Research and Practice Literature** to inform the findings and recommendations. PCG used publicly available achievement and financial information to compare key GISD statistics against local district, state, and national data. The method and sources of data are triangulated to increase the validity of the conclusions, in this case, regarding program implementation, identification of gaps, and recommendations for the continued improvement of GISD's special education programs and services.

This engagement occurred during the COVID-19 Pandemic when a combination of hybrid and in-person learning occurred. Despite the complexities of conducting this review virtually, GISD was committed to the process and worked with PCG to ensure data collection methods were reliable and appropriate given the remote context. The GISD leadership should be recognized for their response to this crisis, as well as maintaining ongoing collaborative engagement with PCG for the purposes of continuing this review.

Details of each data source are included below.

## **Data and Document Analysis**

### **Population Trends, Programs, and Achievement and Outcomes Analysis**

As part of this review, PCG analyzed special education population trends, programs, and achievement outcomes. Through analysis of assessment data, educational setting data, and other indicators, the team compared student identification rates and outcomes by disability, ethnicity, gender, and other demographic variables. Data included in the report also compare students with IEPs to their general education peers.

### **Staffing Analysis**

In partnership with the Council of the Great City Schools, PCG has compiled special education staffing ratios from approximately 70 school districts (very large to very small) nationwide. The district's staffing ratios were incorporated into these data to consider GISD staffing information in a broader context. Staffing comparison data have been used to evaluate the extent to which staff roles, responsibilities, and training are aligned to GISD's expectations.

### **Document Review**

PCG analyzed over 50 documents for information related to district and school structures, programs, policies, and practices. The documents were coded for themes that aligned with the focus group and interview findings. Documents reviewed were in the following general categories:

- Organizational structure, staffing, and resource allocation
- Description of academic programs, services, interventions, and activities
- Documents regarding instruction and professional development
- District procedures and guides, including improvement plan
- Compliance and due process complaints
- Fiscal information

## **Focus Groups**

From March 2021 through April 2021, PCG conducted two sets of focus groups: 1) organizational focus groups/interviews and 2) student file review focus groups. Narrative data from the organizational focus groups and interviews were analyzed using qualitative data analysis strategies. Specifically, a two-cycle coding methodology was implemented to identify "themes" and "sub-themes" from the data. Additionally, the file review focus group narrative was analyzed to identify strengths and areas of improvement within GISD's current practices for IEP development and implementation. Within this report, no focus group or interview participants are personally referred to or quoted directly, although position titles are referenced in some cases, when necessary, for contextual reasons. These data were coded for themes.

### **Organizational Focus Groups and Interviews**

To gain an understanding of how special education programs operate broadly within the district, organizational focus groups and interviews were designed to include a range of stakeholders. These focus groups occurred in March 2021 and included a variety of central office staff, school-based staff, and family participants. PCG worked closely with GISD to determine the best outreach and communication methods for focus group and interview participation.

Focus groups generally consisted of 10-12 participants, while interviews ranged from 1-3 participants. Except in rare circumstances, supervisors did not participate in the same focus group or interview sessions with their staff members to give all staff an opportunity to speak candidly and honestly. PCG provided a sample schedule and a list of positions required to participate. In total, PCG held 74 focus groups and interviews, with over 300 stakeholders participating.

## Student File Review Focus Groups

In April 2021, PCG conducted student-centered file review focus groups that allowed for conversation about school-based practices and included a review of various student documents, specifically eligibility documentation, IEPs, and student progress reports. Through this record review, PCG focused on several topics related to special education management, student identification, programs and services, curriculum and instruction and staffing, and parent engagement, while addressing specific process questions about the development of IEPs, their implementation, and documentation. Student records were selected at random by PCG and included a wide cross-section of schools, ages, gender, and disability categories. GISD staff provided access to the relevant documents associated with the selected students, including the most recent evaluation, IEP, and progress report, and provided copies for discussion via the district's internal email system. An average of five student records was discussed during each focus group session.

Participants included special education teachers and individuals who did not know the student. Each group consisted of approximately four to six participants. To ensure adequate participation in each group, the Chief Academic Office worked in conjunction with the Special Education Department and school-based leadership to select special education staff for participation. Focus groups were held after school to allow for maximum attendee participation and minimal disruption to teaching. In total, PCG held eight student file review focus groups, with approximately 45 stakeholders participating.

## Parent/Family Surveys

An online survey process was implemented to collect data on stakeholder perceptions of the quality and effectiveness of GISD's special education services. PCG collaborated with the Chief Academic Office and Special Education Department to vet survey items and disseminate the survey. Parents were also invited to submit feedback to PCG via email.

Selected survey responses appear within the main body of the report to support discussion of specific topics. The analysis is provided by grade level.

## Survey Items

Survey items were drawn from the research and practice literature in special education and clustered to acquire data from each stakeholder group regarding the extent to which these groups perceived that policies and practices shown in the literature to support effective programming, parent involvement, and positive results for students with special needs were evident in GISD.

The Chief Academic Office and Special Education Department reviewed the survey items to verify their relevance and to add items where appropriate. The survey incorporated five-point rating scales, yes/no questions, and included open-ended text areas. For reporting purposes, the five-point rating scale was consolidated into three categories: agree (which includes strongly agree and agree), disagree (which includes strongly disagree and disagree), and don't know or not applicable (where this option was provided to respondents).

## Survey Process

The Chief Academic Office and Special Education Department worked collaboratively with the PCG team to facilitate a survey process that would result in the highest possible rate of return. To encourage participation, all parents of students with an IEP were informed of the purpose of the survey and provided with instructions for accessing the survey online via the Skyward Message Center. Four reminder emails were sent to parents, and teachers were encouraged to include survey details in their communications with parents and families. The survey was translated into Spanish and Vietnamese.

A total of 736 parents who received the survey completed it online, representing a response rate of 14%. Responses were received from 70 GISD campuses.

## Study Limitations

While PCG adjusted the project methodology to account for the impact of the COVID-19 pandemic, the study had the following limitations:

1. The circumstances presented by the COVID-19 pandemic has inevitably influenced instruction. Teachers' set of instructional tools and approaches are affected as students are not being educated in traditional learning environments. This must be recognized as having some influence on the overall school experience and on the discussion of current special education practices.
2. Data collection for this report was conducted during the 2020-21 school year. This report represents a specific point in time.
3. GISD requested that PCG not administer a new staff survey and, instead, use results from a staff survey administered in 2019.

## PCG's Foundational Approach

PCG's approach to its work with state, county, and district organizations is as a thought partner. That is, we act as an outside agent, with an objective perspective, who works alongside educational entities to identify challenges and provide recommendations for improvement.<sup>1</sup> We follow a mixed method Collaborative Program Evaluation model that is systematic, based upon qualitative and quantitative research methods, and produces credible and valid data that proactively informs program implementation, determines gaps, and offers recommendations for the continued improvement of the program. We value the importance of developing trust, open communication, and fostering collaboration between the review team and program staff.

Our philosophy for improving student outcomes in schools and districts is driven by the U.S. Department of Education's Results Driven Accountability (RDA) structure and rooted in our Special Education Effectiveness Domains framework.

## Results Driven Accountability

The Individuals with Disabilities Education Act (IDEA) is a federal law that makes available a free appropriate public education (FAPE) to eligible children with disabilities throughout the nation and ensures special education and related services to those children. The IDEA governs how states and public agencies provide early intervention, special education, and related services to more than 6.5 million eligible infants, toddlers, children, and youth with disabilities and requires that each public school provide services to eligible students in the least restrictive environment (LRE) and in accordance with each student's IEP.

In the law, Congress states:

*Disability is a natural part of the human experience and in no way diminishes the right of individuals to participate in or contribute to society. Improving educational results for children with disabilities is an essential element of our national policy of ensuring equality of opportunity, full participation, independent living, and economic self-sufficiency for individuals with disabilities.<sup>2</sup>*

One purpose of IDEA is to assess and ensure the effectiveness of efforts to educate children with disabilities. This is done through accountability measures established by both the federal Office of Special Education Programs (OSEP) and state special education agencies and, at times, special education case law.

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<sup>1</sup> "The Power of Collaborative Evaluation" by PCG  
[https://www.publicconsultinggroup.com/media/1272/pcg\\_collaborative\\_evaluation.pdf](https://www.publicconsultinggroup.com/media/1272/pcg_collaborative_evaluation.pdf)

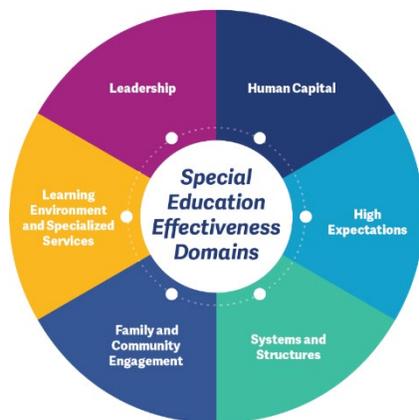
<sup>2</sup> About IDEA, US Dept of Ed <https://sites.ed.gov/idea/about-idea/>

While compliance indicators remain important, under the RDA framework, OSEP has sharpened its focus on what happens in the classroom to promote educational benefits and improve outcomes and results for students with disabilities. This change was based on data showing that the educational outcomes of America’s children and youth with disabilities have not improved as expected, despite significant federal efforts to close achievement gaps. The accountability system that existed prior to the new one placed substantial emphasis on procedural compliance, but it often did not consider how requirements affected the learning outcomes of students.<sup>3</sup> This shift is having a great impact in guiding the priorities of special education departments nationwide, including in GISD. Districts nationwide need to raise the level of and access to rigor in the classroom and generate a culture of academic optimism.<sup>4</sup>

These issues became even more significant with the March 22, 2017, U.S. Supreme Court decision in *Endrew F. v. Douglas County School District*.<sup>5</sup> In this decision, the Court updated its prior standard for determining a school district’s provision of an appropriate education for students with disabilities. This case centered on the importance of establishing ambitious and challenging goals that enable each student to make academic progress and functional advancement and advance from grade to grade. Progress for a student with a disability, including those receiving instruction based on alternate academic achievement standards, must be appropriate in light of his/her circumstances. Furthermore, yearly progress must be more demanding than the “merely more than de minimis” standards that had been used by some lower courts. The Court made it clear that IDEA demands more. In *Endrew*, the Supreme Court reached a balance between the standard established by the 10th Circuit and other circuits (more than de minimis) and the higher standard promoted by Endrew’s parents (goal of providing students with disabilities opportunities to achieve academic success, attain self-sufficiency, and contribute to society that are substantially equal to the opportunities afforded children without disabilities). The *Endrew* decision’s most significant impact in the classroom can be seen in: (1) the design and development of rigorous Individualized Education Programs (IEPs); (2) the implementation of students’ IEPs with fidelity; and (3) increased progress monitoring of IEP goals.

## Special Education Effectiveness Domains

Building on extensive research and our collective experience and expertise serving school districts and state departments of education nationwide, PCG has developed this Special Education Effectiveness



Framework to assist school districts in catalyzing conversations about, and reviewing and improving the quality of, their special education programs.<sup>6</sup> It is designed to provide school district leaders with a set of practices to strengthen special education services and supports, to highlight the multidisciplinary, integrated nature of systemic improvement, and to clearly establish a pathway for districts to move toward realizing both compliance and results. An intentional focus on improving outcomes for students with disabilities leads to improved outcomes for ALL students.

When implemented with a systems-thinking approach, the six domains of our Special Education Effectiveness Framework help superintendents and district leaders improve educational and functional outcomes for students with disabilities.

<sup>3</sup> April 5, 2012, RDA Summary, U.S. Department of Education. [www2.ed.gov/about/offices/list/osers/osep/rdasummary.doc](http://www2.ed.gov/about/offices/list/osers/osep/rdasummary.doc)

<sup>4</sup> Hoy, W. K., Tarter, C. J., & Woolfolk Hoy, A. (2006). Academic optimism of schools: A force for student achievement. Working Paper. The Ohio State University. <http://www.waynehoy.com/school-academic-optimism/>

<sup>5</sup> Supreme Court of the United States. Retrieved from [https://www.supremecourt.gov/opinions/16pdf/15-827\\_0pm1.pdf](https://www.supremecourt.gov/opinions/16pdf/15-827_0pm1.pdf)

<sup>6</sup> Special Education Effectiveness Framework, PCG [https://publicconsultinggroup.com/media/3347/special-education-effectiveness-framework\\_policy-paper.pdf](https://publicconsultinggroup.com/media/3347/special-education-effectiveness-framework_policy-paper.pdf)

The recommendations provided in this report are organized around these domains and are oriented toward extending GISD's focus on outcomes for students with disabilities.

## Terminology

There are several terms used throughout this report that require definition and clarification within the GISD context.

**Admission, Review, and Dismissal (ARD) committee.** After the initial evaluation report is completed, an ARD committee must be formed to consider the report and determine whether a child is eligible for special education and related services. The ARD committee is responsible for the development of the Individualized Education Program (IEP). Focus group participants often referred to the IEP document as an "ARD," though this term specially refers to the ARD committee and the team process used to develop an IEP.

**Gender data.** Current data collection at the GISD and at the federal level is binary, with comparative data available for males and females only. As such, these categories are used throughout this report.

**Emotional disability.** The federal data reporting category of "emotional disturbance" is also reflected in Texas regulations. PCG uses the more inclusive term "emotional disability" in charts and analysis contained throughout this report.

**Parents.** In the context of this report, a parent is defined as natural or adoptive parents of a child, a guardian, a parent acting in the place of a parent (such as a grandparent or stepparent with whom the child lives, or a person who is legally responsible for the child's welfare) or a surrogate parent. The term "parent" is inclusive of families as well.

**Stetson model.** GISD staff received training on inclusive practices through the Stetson and Associates consulting firm. Throughout this report this training is referred to as the "Stetson model." While that is not the official designation for this training, it is representative of how the GISD staff have internalized this work.

**Students receiving special education services.** References are made to students receiving special education services. They will also be referred to as students with Individualized Education Programs (IEPs) or students with disabilities (SWDs). The terms are intended to be interchangeable. This categorization does not include students with disabilities who have 504 Plans.

## II. EXECUTIVE SUMMARY

This section provides an overview of GISD, the district's major initiatives, and district-wide data related to special education.

### District Context

Educating over 55,000 students from preschool through 12<sup>th</sup> grade across 72 campuses, Garland ISD (GISD) is the second-largest district in Dallas County, the fifth-largest in Dallas-Fort Worth, the 15<sup>th</sup> largest in Texas, and is among the 75-largest in the United States. The district serves the communities of Garland, Sachse, and Rowlett. GISD boasts a diverse population that speaks more than 100 languages, as well as technology-driven campuses, magnet programs and approximately 200 Career and Technical Education (CTE) courses. The student body is a community of diversity in all facets, including background, language, and income. Over half of students (51.6%) identify as Hispanic/Latino, 17.6 percent as Black/African American, 17.3 percent as white, 2.6 percent as multi-racial, and 1.6 percent as American Indian/Alaskan.<sup>7</sup> Approximately two-thirds (65.8%) of students are economically disadvantaged. English Language learners represent 34 percent of the population, 9.4 percent of students receive special education services, and 8.4 percent receive Gifted & Talented services. Continuing to honor the racial, economic, academic, and neurological diversity of its students will be critical for GISD's future.

GISD's reputation is that of a high-performing district with several award-winning schools, accolades for its programming, and a culture that celebrates its diversity. GISD was recently selected as one of six districts chosen for The Holdsworth Center Partnership, a five-year grant designed to grow excellent school principals and develop a strong bench of candidates who are ready to lead and fill leadership vacancies. In recent years it was also invited to the Texas Education Agency's System of Great Schools (SGS) Network and earned the EVERFI Champion Seal, awarded annually to North American school districts making an exemplary commitment to whole-child education. A focus for the 2021-22 school year is to increase overall enrollment numbers by marketing the open enrollment out-of-district transfer program for students who reside outside the district's boundaries.

Following the appointment of a new superintendent in 2018, the district has sought to enact a bold vision of access, equity, and opportunity for ALL students and institute a culture of continuous improvement. To identify levers for change aligned to this vision, GISD recently engaged with several external organizations to conduct evaluations, one focused on equity, one on human resources practices, and this one on special education. These evaluations are timely in that resetting programs, expectations, and approaches given the impact of the COVID-19 pandemic are top of mind for GISD leadership.

PCG was contracted to provide an objective view of the special education program in GISD and has identified both strengths and areas of improvement, or root causes, that require focus in the coming years. These root causes emerged from our analysis of data we collected and are discussed in detail in this report. While these root causes will require significant attention, the recommendations at the conclusion of this report serve as a roadmap to address them, leading to the future growth of the special education program and a path to help GISD to create the world-class services we know it desires.

### Root Causes

#### 1) Identification and support for struggling learners

With the addition of Intersession and a dedicated Interventions Office, Garland ISD has demonstrated its commitment to supporting both students requiring intervention and those in need of enrichment. The

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<sup>7</sup> Less than 1% of students identify as Hawaiian/Pacific Islander.

## KEY STRENGTHS

- ❖ The Superintendent and Board of Trustees have prioritized the improvement of special education services district-wide.
- ❖ Intersession is widely viewed as a positive approach to supporting all students with intervention and enrichment.
- ❖ Special education department staff are seen as knowledgeable and supportive to campuses.
- ❖ A robust list of topics covering most components of special education service delivery were held for campus leaders in 2020-21.
- ❖ GISD uses multiple modes of communication for sharing information with parents.
- ❖ There are caring, concerned teachers and paraprofessionals who express commitment to establishing connections with parents.
- ❖ The Department of Special Education has collaborated with the Budget Department to improve budget monitoring practices.
- ❖ The district has written guidance for Multi-Tiered Systems for Support (MTSS) and special education.

development of a robust, structure Multi-Tiered System of Supports (MTSS) approach, though, has been hampered by the lack of a clear central office leadership team and the fact that academic and behavioral intervention functions and Intersession management are spread across departments. School teams struggle to understand the intersection of Response to Intervention (RTI), and Positive Behavior Intervention Supports (PBIS), MTSS, and what an appropriate, data-driven referral for special education means.

Students of color are disproportionately overidentified in certain disability classifications, placed in more restrictive settings, and subjected to harsher behavioral consequences. This can be attributed to several factors, including but not limited to 1) lack of central office-based oversight of schools operating as siloes throughout the special education process, 2) inefficient programmatic supports for students experiencing complex trauma and behavioral challenges, and 3) unchecked biases of diagnostic and school-based staff struggling to identify and meet the needs of these students.

### **2) Continuum of services and specially designed instruction (SDI)**

The continuum of services for students with disabilities in GISD is rooted in exclusionary practices. These practices are reflected in the limited number of placements for students with disabilities to be served. Students with less complex manifestations of their disability are often educated in an inclusive setting, with specially designed instruction being implemented in short intervals, such as 15-minute increments. Subsequently, modified versions of specially designed instruction are being provided by paraprofessionals to supplement for students with disabilities. This overreliance on less trained staff members has led to teacher resource dependency.

Alternatively, students with significant disabilities or behavioral challenges are placed in more restrictive settings. GISD offers several programs and classrooms to meet these student's needs; however, there is a significant continuum gap in addressing more complex mental health needs for students with disabilities. To date, GISD is not funding any private placements of students in residential programs or has any partnerships with mental health facilities. The placement of students with disabilities and rigor of self-contained settings is not representative of GISD's high-quality expectations.

Unethical practices in IEP implementation carryover into progress monitoring and goal achievement for students with disabilities in GISD. The file review, conducted as part of this study, revealed

that every IEP examined had a "70% goal mastery." The narrative of this practice surfaced during focus groups and interviews that despite state-level guidance from the Texas Education Agency (TEA), it is not an appropriate expectation to align all IEP goal mastery with passing grade expectations. A major hallmark

of IDEA is the importance of individualizing IEP goals and how they are to be mastered by each student. Standardizing mastery and arbitrarily assigning 10% acquisition percentages each quarter is not adherence to the intent or spirit of IDEA.

### **3) Adherence to intent and spirit of IDEA**

Overall, students with disabilities do not appear to be celebrated or acknowledged as part of the GISD culture. When asked what one would observe when walking into a school building that houses a special education program, an interviewee provided the following response based upon their experience during a school tour:

*“In one school, we had a student that was almost kept in the class with no supports. They did not receive any additional supports. The principal did not want to pull him out because all the students liked him like a ‘pet.’ I did a walkthrough in a school and noticed a student who was just rocking back and forth. They (education team members) needed to start a plan for her, but still had not started that. Everything on the spectrum that you might see if you walk into a classroom. Some students are ‘wasting away’ because they have nothing to support their learning.”*

There must be a shift in professional obligation to not only engage in inclusive practices but to prioritize the humane treatment of students.

Decisions made regarding IEP provision are made outside of the IEP teams or overruled by campus leaders. School-based leadership carries significant power throughout GISD in how students with disabilities are served in their buildings and whether these students are integrated into the culture of the school. This variability, contingent upon campus leadership, has resulted in inconsistencies with IEP implementation and how school-based staff perceives students with disabilities. This experience has left the PCG evaluation team wondering, “who in GISD is the champion for students with disabilities?”

### **4) Inclusivity**

Students with disabilities are generally not viewed as part of the equity focus in GISD. The narrative data from this review supports the belief that students with disabilities, particularly those with more complex behavioral challenges or significant delays, are seen as “separate.” One participant referred to their role in supporting students with disabilities in their general education setting as “doing inclusion.”

A core component of an inclusive culture is setting high expectations for all students. Specifically, the general education classroom at the student’s enrolled grade level is the reference point for student-specific planning, instruction is based on the curriculum standards adopted by the district or the state, and individualized supports are available when needed. Though focus group participants did not discuss at length the expectations they set for students with disabilities, they did share the academic challenges they believe are associated with having students with disabilities in their schools. Inherent in many of their comments is the assumption that students with disabilities are a liability, that they are not capable of positively contributing to a school’s assessment results, and that the school does not have a responsibility to build scaffolds and supports to help them reach their academic potential.

### **5) Leadership and staffing**

The belief held by some building administrators that students with more complex or significant disabilities and programs to support their growth are not welcomed in their building impacts GISD leadership goals. A fixed mindset is fostered by instruction that is inclusive in name only, where building administrators are not supportive of co-teaching and a belief by some building administrators that their buildings are not suited for students with disabilities. This has led to no shared vision or execution strategy that is consistent across GISD campuses with how special education and related services are provided.

GISD special education leadership made strides to rectify this belief system; however, the decentralization of power made this a difficult task. It is critical that GISD senior leadership establish protocols of accountability to ensure consistency in service provision. It is equally important that the mental models that exclude students with disabilities from the fabric of GISD be examined in-depth. Exercising accountability of protocols is only effective when implemented with cultural change to shift the leadership mindset around inclusion.

There also are challenges around human capital, specifically with hiring and retention, and training. Despite year-round recruitment and other strategies to attract candidates, GISD has to focus on filling positions with highly qualified candidates throughout the school year. Further, staff believes GISD's PD is segmented and not targeted to their needs. The district needs a coordinated and differentiated training plan focused on special education from various angles across all departments for special and general educators.

## **6) School leaders' voice**

GISD operates under a site-based management model, which has a significant impact on the consistency of programming, including special education, from campus to campus. Traditionally, campus leadership has had a powerful say in how services are provided in their buildings and generally has not looked to the special education department for guidance, direction, or support. In some buildings, this has meant that school leaders are providing the needed leadership and resources to their campus's special education program and assume ownership for it, while in others, special education is an afterthought. Striking a balance between school-level decision making and the cohesiveness and standardization required to ensure high-quality special education service delivery in all schools will require finesse and a nuanced approach in the future.

## **7) Establishing systems and practices to promote accountability**

Promoting accountability across all levels of GISD staff and practices will be critical to the success of students with disabilities. GISD leadership has drafted a series of handbooks to guide the implementation of the special education process; however, there appears to be a disconnect between theory and practice. The notion that a self-contained classroom or program can be arbitrarily reassigned based upon the perspective of a building-level administrator's wish is neither equitable nor accountable.

Systems of accountability must be established and enforced. This includes ensuring that the intent and spirit of IDEA is adhered to in every building, as well as processes to address staffing needs. Responsive staffing models are essential to meet the needs of students with disabilities in accordance with federal, state, and local regulations. One recurring concern across respondents was the lack of responsiveness and fluidity of staffing allocations throughout the school year. Relying on a stringent number of staff, particularly support staff, with little to no room for diversification to support changing enrollment needs, has a direct implication on SDI for students with disabilities.

Limited staffing and a lack of clarity in the fundamentals of SDI has a direct impact on services delivered and documented for students with disabilities in GISD. An interviewee shared that "data is discussed, but not really attached to anything, so there isn't an understanding of how to shift that data." Limited data on service provision was available for review as part of this study. Narrative data from study participants revealed potential gaps in service provision as outlined in a student's IEP and what occurs in practice.

## **8) Facilities and resource allocation**

The allocation of facilities and resources within GISD does not occur with consistency or transparency across the district. The Facilities team has expressed a genuine desire to be more collaborative with the Office of Special Education and Finance to adequately prepare for the transition and implementation of a self-contained classroom or program. It was reported that "we get involved at the delivery point which is too far down the road.... What happens is someone calls us up and asks 'Is this doable? Where should we put it?'"

Moving forward, GISD should explore opportunities for cross-collaboration to plan both in the short and long term for special education programming facility needs.

### **9) Resources to address mental health and behavioral concerns**

GISD special education leadership does not appear to be using staff for their capacities, particularly mental health professionals (LSSPs) operating exclusively to complete assessments. The lack of structural and LRE opportunities for students with mental health concerns has resulted in the closing of Pathfinder Achievement Center (PAC), high rates of black students being identified as having emotional disabilities, and subsequently being educated in restrictive settings. There needs to be programmatic and systemic shifts to prioritize the talents of mental health practitioners to more student-facing supports and counseling services and to redesign assessment practices.

### **10) Family engagement vision**

While parent engagement in GISD is considered relatively low, the parents who participated in the parent survey overwhelmingly shared positive feedback around engagement with teachers and paraprofessionals. They reported receiving regular feedback on their child's progress and agreed that they felt supported. When asked, on the survey, if their child's special education teacher has high expectations for their child, the majority of parents (83%) agreed. In addition, parents reported they had the opportunity to visit schools prior to the COVID-19 pandemic and felt included in the goal-setting process for their students.

The dichotomy here can be summarized as: "limited parent engagement, however, those engaged feel supported." There are opportunities to increase parent engagement through regular access to translated materials and translators support communication. Additionally, parents requested more opportunities for training around their rights under IDEA and how to support their students at home.

## **Summary**

With a sense of urgency and an unrelenting commitment to enacting the recommendations in this report, PCG believes GISD can achieve the high-quality programming for ALL students, especially those with disabilities, that we know it seeks. The Superintendent and Board of Trustees have publicly expressed commitment to making the changes necessary. The start of a new interim Executive Director of Special Education, following the short tenure of the previous one who was seen a "positive disruptor," who shed light on the needs in special education, reflects the beginning of necessary shifts. Initiating this kind of change requires attention, a strong vision from the Superintendent and Board of Trustees that is enacted by senior leadership staff, an appropriate allocation of resources, mandated professional learning, and clear, non-negotiable accountability measures. PCG strongly encourages GISD to develop a bold, creative, and transparent implementation plan to which it will hold itself accountable, and that is informed by input from a wide range of community stakeholders. Doing so will position GISD for its upward trajectory for years to come.

### III. STATE PERFORMANCE PLAN (SPP) AND GISD'S RDA RESULTS

To meet the general supervision requirements under the IDEA, OSEP has established SPP requirements and 17 indicators to monitor each state.<sup>8</sup> While compliance indicators must have a federally required target of 100%, states develop annual targets for each performance indicator and monitor outcomes for each Local Education Agency (LEA).<sup>9</sup> Compliance indicators are listed further below. Each year, states must publicly report state and LEA outcomes for each SPP indicator and associated targets.

OSEP has been criticized in past years that the SPP indicators are heavily focused on compliance and have limited focus on results for students with disabilities. As a result, in 2013, the Department announced its intention to change this practice and to include test scores, graduation rates, and post-school outcomes as the basis of the new RDA structure. The intent of RDA is to strike a balance between the focus on improved results and functional outcomes for students with disabilities while still adhering to the compliance requirements of IDEA. RDA is designed to be transparent and understandable and to drive improvement in the academic and functional achievement of students with IEPs.

The SPP indicator data collected takes on additional importance with OSEP's move to the RDA framework, as there are points associated with both a "Part B Compliance Matrix" and a "Part B Results Driven Accountability Matrix."

The following are compliance indicators.

- **Indicator 4b.** Severely discrepant out-of-school suspensions by race/ethnicity but associated with compliant IDEA practices
- **Indicator 9.** Disproportionate of all students with IEPs based on race/ethnicity but associated with compliant IDEA practices
- **Indicator 10.** Disproportionate representation of students based on race/ethnicity by six disability categories but associated with compliant IDEA practices
- **Indicator 11.** Timely initial eligibility evaluations
- **Indicator 12.** Timely Part C (students from birth to 2 years) to Part B (students 3 to 21 years of age) transition
- **Indicator 13.** Secondary transition goals and services documented in IEPs

States are required to include the following SPP performance indicators in their RDA framework. In addition, states may choose to include other performance indicators as part of their state accountability framework. Each state's framework must include and establish a target for each of the following SPP areas:

- **Indicator 1.** Graduation rate
- **Indicator 2.** Dropout rate
- **Indicator 3.** Statewide assessment participation rate

As discussed in more detail below, TEA has chosen to include additional performance SPP indicators and all significant disproportionality indicators in its state RDA framework. The SPP indicators included are:

- **Indicator 5A-C.** Students ages 6-21 educated in general education  $\geq 80\%$  of the time and  $< 40\%$  of the time; and in separate settings

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<sup>8</sup> The list of 17 indicators are as follows: 1) Graduation Rate; 2) Dropout Rate; 3) Assessment (Participation and Performance); 4) Rates of Suspension; 5) Least Restrictive Environment, ages 6-21; 6) Preschool Least Restrictive Environment, ages 3-5; 7) Preschool Outcomes; 8) Parent Involvement; 9 and 10) Disproportionate Representation due to Inappropriate Identification; 11) Timely Initial Evaluations; 12) Early Childhood Transition; 13) Secondary Transition; 14) Post-School Outcomes; 15 and 16) Dispute Resolution; and 17) State Systemic Improvement Plan

<sup>9</sup> In Texas, LEAs are responsible for 14 of the 17 indicators.

- **Indicator 6A.** Children ages 3-5 educated in regular early childhood education

The table below shows GISD outcomes for the 2018-19 school year (2020 District Profile). Some indicators are not measured every year. In 2018-19 six GISD indicators were not measured, and these are noted as “N/A.” GISD met targets for 12 indicators (54.5%) and did not meet targets for ten indicators (45.5%).<sup>10</sup> In several areas, GISD was very close to the target. Areas in which GISD met and did not meet targets are listed below.

**Met TEA Targets.** GISD met targets for the following indicators:

- 2. Dropout (2);
- 3B. Statewide assessment participation (reading and math);
- 6A. Education in regular early childhood program;
- 7A-C. Substantially increased skills (positive social/emotional; acquisition/use of knowledge/ skills; use of appropriate behaviors to meet needs);
- 9. Disproportionality by race/ethnicity as a result of inappropriate identification;
- 10. Disproportionality by race/ethnicity by disability category as a result of inappropriate identification;
- 11. Child find;
- 12. Early childhood transition; and
- 13. Secondary transition.

**Did Not Meet TEA Targets.** GISD did not meet targets for the following indicators:

- 2. Graduation;
- 3C. Statewide assessment proficiency (reading/math);
- 5A. Education inside regular class  $\geq 80\%$  of the time;
- 5B. Education inside regular class  $< 40\%$  of the time;
- 5C. Education in separate settings;
- 6B. Children ages 3-5 education in separate settings;
- 7A-C. Functioning within age-appropriate expectations (positive social/emotional skills, acquisition/use of knowledge/ skills; use of appropriate behaviors to meet needs).

**Table 1. State Performance Plan Indicators with GISD Outcomes (2018-19 Data)**

| Indicators                |   | GISD Rate | TEA Target | GISD Met Target |
|---------------------------|---|-----------|------------|-----------------|
| Exit From High School     | 1. Graduation   | 77.3%     | 88.5%      | No              |
|                           | 2. Dropout  | 1.3%      | 1.8%       | Yes             |
| Statewide Assessments     | 3B. Statewide assessment participation rate - Reading | 97.4%     | 95%        | Yes             |
|                           | 3B. Statewide assessment participation rate - Math    | 98.6%     | 95%        | Yes             |
|                           | 3C. Statewide assessment proficiency rate - Reading   | 20.1%     | 98%        | No              |
|                           | 3C. Statewide assessment proficiency rate - Math      | 23.9%     | 98%        | No              |
| Out of School Suspensions | 4A. Suspension >10 days /expulsion overall            | N/A       | 0.0%       | N/A             |

<sup>10</sup> This count includes indicators and sub-indicators.

| Indicators                           |  | GISD Rate | TEA Target | GISD Met Target |
|--------------------------------------|--|-----------|------------|-----------------|
|                                      | 4B. Suspension > 10 days/expulsion by race/ethnicity (compliant procedures)  | N/A       | 0.0%       | N/A             |
| Educational Environments (ages 6-21) | 5A. Inside regular class 80% or more of the day  | 66.4%     | 68.0%      | No              |
|                                      | 5B. Inside regular class less than 40% of the day  | 16.1%     | 12.0%      | No              |
|                                      | 5C. Separate schools, residential facilities, or homebound/hospital placements                                       | 1.7%      | 1.3%       | No              |
| Educational Environments (ages 3-5)  | 6A. Regular early childhood program  | 34.7%     | 33.0%      | Yes             |
|                                      | 6B. Separate special education class, separate school, or residential facility                                       | 18.8%     | 15.0%      | No              |
| Early Childhood Outcomes             | 7A. Positive social/emotional skills: substantially increased skills   | 87.2%     | 85%        | Yes             |
|                                      | 7A. Areas above: functioning within age expectations   | 55.3%     | 63%        | No              |
|                                      | 7B. Acquisition/use of knowledge/ skills: substantially increased skills   | 85.2%     | 85%        | Yes             |
|                                      | 7B. Areas above: functioning within age expectations   | 55.3%     | 58%        | No              |
|                                      | 7C. Use of appropriate behaviors to meet needs: substantially increased skills                                       | 86.5%     | 85%        | Yes             |
|                                      | 7C. Areas above: functioning within age expectations   | 69.3%     | 74%        | No              |
| Parent Involvement                   | 8. Parent Involvement  | N/A       | 81%        | N/A             |
| Disproportionality Race/Ethnicity    | 9. Disproportionality by race/ethnicity: result of inappropriate identification                                      | N/A       | 0.0%       | Yes             |
|                                      | 10. Disproportionality by race or ethnicity in specific disability categories result of inappropriate identification | N/A       | 0.0%       | Yes             |
| Child Find                           | 11. Child find   | 100%      | 100%       | Yes             |
| Transition                           | 12. Early childhood transition   | 100%      | 100%       | Yes             |
|                                      | 13. Secondary transition   | 100%      | 100%       | Yes             |
| Post-School Outcomes                 | 14A. Enrolled in higher education  | N/A       | 30%        | N/A             |
|                                      | 14B. Same as 14A, or competitively employed  | N/A       | 63%        | N/A             |
|                                      | 14C. Same as 14B, or in some other postsecondary program   | N/A       | 80%        | N/A             |

## TEA's RDA Matrix and State Accountability

TEA has expanded the RDA framework to address areas beyond special education. These additional areas concern: 1) bilingual education, English as a second language and English learner indicators; and 2) other special populations (foster care, homelessness, and military-connected).

### RDA Special Education Categories

RDA has 18 indicators for special education that are organized by three domains. The table below lists these indicators by domain.<sup>11</sup> Several indicators have data reported for LEA information only and do not include performance levels (PLs). After one or two years, TEA will include PLs and measure LEA outcomes against them. Indicators 9 through 18 apply the risk ratio measure that IDEA requires for the measurement of significant disproportionality. Significant disproportionality and the risk ratio measure are discussed in more detail in the Significant Disproportionality section further below.

Table 2. Description of TEA's RDA Components for Special Education

| Indicators  | SPECIAL EDUCATION COMPONENT DESCRIPTION   | No Performance Level | Similar to or Same as SPP Indicator | Data Reported |
|---|---|----------------------|-------------------------------------|---------------|
| <b>DOMAIN I. Academic Achievement (Indicators 1-5)</b>      |   |                      |                                     |               |
| 1<br>(i-v)  | <b>STARR 3-8</b> passing rate (math, reading, science, social studies & writing)  |                      | 3C                                  |               |
| 2   | <b>Dyslexia Reading</b> STARR 3-8 passing rate  |                      |                                     |               |
| 3<br>(i-v)  | <b>Year-after-exit</b> STARR 3-8 passing rate (5 subjects - students with IEPs the previous year and no IEP in current year)                  |                      |                                     |               |
| 4   | <b>End of course (EOC)</b> STARR passing rate (Algebra I, Biology, U.S. History & English I/II)   |                      | 3C                                  |               |
| 5   | <b>Alternate 2</b> STARR participation rate (No PL assigned)  |                      |                                     |               |
| <b>DOMAIN II. Post-Secondary Readiness (Indicators 6-7)</b> |   |                      |                                     |               |
| 6   | <b>Graduation rate</b> (based on grade 9 cohort)  |                      | 1                                   |               |
| 7   | <b>Annual dropout rate</b> (based on students in grades 7-12 who dropped out in a given school year)  |                      | 2                                   |               |
| <b>DOMAIN III. Disproportionality (Indicators 8-18)</b>     |   |                      |                                     |               |
| 8   | <b>Dyslexia representation</b> (ages 6-21): For students with dyslexia, rate difference between those with IEPs & all students with dyslexia. |                      |                                     |               |

<sup>11</sup> RDA 2020 Manual. <https://tea.texas.gov/academics/special-student-populations/review-and-support/results-driven-accountability-rda>

| Indicators | SPECIAL EDUCATION COMPONENT DESCRIPTION   | No Performance Level | Similar to or Same as SPP Indicator | Data Reported |
|------------|---|----------------------|-------------------------------------|---------------|
| 9          | Regular early childhood program rate (ages 3-5)   |                      | 6A                                  |               |
| 10         | Regular class $\geq 80\%$ of time rate (ages 6-21)  |                      | 5A                                  |               |
| 11         | Regular class $< 40\%$ of time rate (ages 6-21)   |                      | 5B                                  |               |
| 12         | Separate settings rate (ages 6-21)  |                      | 5C                                  |               |
| 13         | Special education identification by one of 6 primary disability categories, risk ratio for race/ethnicity (ages 3-21)                             |                      |                                     |               |
| 14         | Out-of-school (OSS)/expulsion $\leq 10$ days, risk ratio for race/ethnicity (ages 3-21)   |                      |                                     |               |
| 15         | OSS/expulsion $> 10$ days, risk ratio for race/ethnicity (ages 3-21)  |                      | 4B                                  |               |
| 16         | In-school suspension (ISS) $\leq 10$ days risk ratio for race/ethnicity (ages 3-21)   |                      |                                     |               |
| 17         | ISS $> 10$ days risk ratio (ages 3-21)  |                      |                                     |               |
| 18         | Total disciplinary removals risk ratio (ages 3-21): all ISSs, OSSs, removal to interim alternative education placement & hearing officer removals |                      |                                     |               |

For the above disproportionality analyses, except for dyslexia representation, TEA follows the IDEA significant disproportionality risk ratio measure. The state uses a maximum 2.5 risk ratio threshold based on three years of data. A local education agency (LEA) with a risk ratio above 2.5 for three years with reasonable progress will not be cited if the data show reasonable progress. This means that the difference between the LEA's year 3 and 1 risk ratio meets the rate of progress needed to fall below the 2.5 threshold in year 4.

### ***GISD's RDA Results***

For the GISD results shown in the table below, students were enrolled on October 25, 2019 (fall snapshot date) and tested in the same LEA in the fall of 2019 or spring of 2020. The highest performance level (PL) is reported with a "0." No PLs were reported for indicators 1-5 due to COVID school closures. The GISD report did not show an overall RDA rating or for special education components.<sup>12</sup>

**Table 3. GISD's 2020 RDA Report for 2020**

| Indicators                            |   | GISD Outcomes                               |
|---------------------------------------|---|---|
| <b>DOMAIN I. Academic Achievement</b> |   |   |
| 1 (i-v)                               | STARR 3-8 passing rate                  | No PL reported due to COVID school closures |
| 2                                     | Dyslexia STAAR 3-8 Reading passing rate |   |

<sup>12</sup> RDA Data & Reports. <https://tea.texas.gov/academics/special-student-populations/review-and-support/results-driven-accountability-rda>

| Indicators   |  | GISD Outcomes  |
|--|--|--|
| <b>3 (i-v)</b>   | Year-after-exit STAAR 3-8 passing rate   |  |
| <b>4</b>   | End of course (EOC) STARR passing rate   |  |
| <b>5</b>   | <b>Alternate 2</b> STARR participation rate  |  |
| <b>DOMAIN II. Post-Secondary Readiness</b>   |  |  |
| <b>6</b>   | <b>Graduation rate</b> (based on grade 9 cohort)   | <b>PL = 1</b> (GISD = 71.2%)   |
| <b>7</b>   | Annual dropout rate (based on students in grades 7-12 who dropped out in a given school year)  | <b>PL = 0</b> (GISD = 0.7%)  |
| <b>DOMAIN III. Disproportionality Analysis</b><br>Risk ratios reported for specific racial/ethnic groups only for GISD areas with significant disproportionality. Otherwise, an overall rate for all students with IEPs is reported. |  |  |
| <b>8</b>   | <b>Dyslexia representation:</b> ages 6-21, for students with dyslexia, <u>rate difference</u> between those with IEPs & all students with dyslexia.  | Report only<br>State = 6.3; GISD = 7.8-pt difference (3.9% special ed & 6.1% all students) |
| <b>9</b>   | <b>Regular early childhood program</b> (ages 3-5)  | <b>PL = 0</b> (GISD = 32.0%)   |
| <b>10</b>  | <b>Regular class <math>\geq 80\%</math></b> of time (ages 6-21)  | <b>PL = 0</b> (GISD = 68.5%)   |
| <b>11</b>  | <b>Regular class <math>&lt; 40\%</math></b> of time (ages 6-21)  | <b>PL = 1</b> (GISD = 15.5%)   |
| <b>12</b>  | <b>Separate settings</b> (ages 6-21)   | Report only<br>State = 0.33%; GISD = 1.1%  |
| <b>13</b>  | <b>Special education identification - 6 disability categories</b> (ages 3-21)  | Report only<br>9.58 GISD IEP rate  |
| <b>14</b>  | <b>Out-of-school (OSS)/expulsion <math>\leq 10</math> days</b> (ages 3-21)   | Report only<br>State = 6.3%; GISD = 8.3%   |
| <b>15</b>  | <b>OSS/expulsion <math>&gt; 10</math> days</b> (ages 3-21)   | Report only<br>State = 0.4%; GISD = 0.5%   |
| <b>16</b>  | <b>In-school suspension (ISS) <math>\leq 10</math> days</b> (ages 3-21)  | Report only<br>State = 10.8%; GISD = 10.3%   |
| <b>17</b>  | <b>ISS <math>&gt; 10</math> days</b> (ages 3-21)   | Report only<br>State = 0.9%; GISD = 0.7%   |
|  | Reported: Black students had 2.9 risk ratio for ISS $> 10$ days (2020 & 2019)<br><b>PL of significant disproportionality for 2<sup>nd</sup> year</b> |  |
| <b>18</b>  | <b>Total disciplinary removals</b> (ages 3-21)   | <b>PL = 3</b><br>55.1% (2020); 60.5% (2019)  |

### Significant Disproportionality

The TEA identifies districts with 2.5 risk ratio or higher as having significant disproportionality.<sup>13</sup> PCG conducted a risk ratio analysis of GISD data to identify any over-identification of students with disabilities based on race/ethnicity in the areas of disability, educational placement, and discipline. The identification and suspension categories include students 3 to 21 years of age, and the placement category includes students 6 to 21 years of age. PCG's risk ratio calculation is not designed to replicate the TEA's significant disproportionality methodology and does not include all areas of suspension. The intent of this calculation is to provide a formative data point to assess the extent to which decisions for these three areas are impacted by students' race/ethnicity. This tool can be used to inform ongoing analysis and monitoring. For this purpose, PCG used a 2.0 risk ratio or more for a racial/ethnic group to indicate a higher risk of over-

<sup>13</sup> <https://tea.texas.gov/academics/special-student-populations/special-education/programs-and-services/significant-disproportionality>. Note that TEA uses a risk difference methodology for measuring racial/ethnic differences under the State Performance Plan for out-of-school suspensions of more than 10 days and for identification of disability and six disability areas.

representation, a 1.0 risk ratio indicates perfect proportionality, while a risk ratio of less than 0.5 indicates a higher risk of under-representation. Throughout this report, PCG will provide risk ratio analyses in several different areas.

## GISD Special Education Demographics

### **Disability Identification: School Aged Students**

The information in this section includes data about GISD disability incidence, achievement outcomes, and educational environments in which students with IEPs learn. Students' loss of instruction through unexcused absences and disciplinary removals, which impact achievement, are also discussed. These data are disaggregated by such variables as disability categories, grade, race/ethnicity, gender, English learner status, free and reduced lunch program status, and gifted status. Data for each category is compared to state and national data when publicly available. Unless otherwise stated, the data is based on GISD students 6 to 21 years of age and based on the October 2020 headcount snapshot the district provided to PCG.<sup>14</sup>

### **Identification for GISD, State, and Nation**

In 2019-20, 9.9 percent of all GISD students 6 through 21 years of age received special education pursuant to an IEP, compared to the 10.7 percent state average.<sup>15</sup> The last national data from 2018-19 reported that 14.0 percent of all public-school students had an IEP, a rate that was substantially higher than the GISD and Texas figures.<sup>16 17</sup>

**Exhibit 1. Identification Rates for GISD, State, and Nation**



### **Identification by Disability Category: District, State and Nation**

Of all disability areas, the district's 23.5% specific learning disability rate exceeded the state and nation rates by 9.6 and 15.5 percentage points, respectively. The emotional disturbance (6.9%) was about the same as state (6.5%) and national rates (6%). Intellectual disability (11.1%) and other health impairment (14.0%) rates were comparable to state rates, but the ID rate was 4.1 points higher, and the OHI rate was 3.0 points lower than national rates. The autism (18.6%) and speech/language impairment (23.1%) rates were both higher than state (5.1 and 5.4 points, respectively) and national (7.6 and 6.1 percentage points) averages.

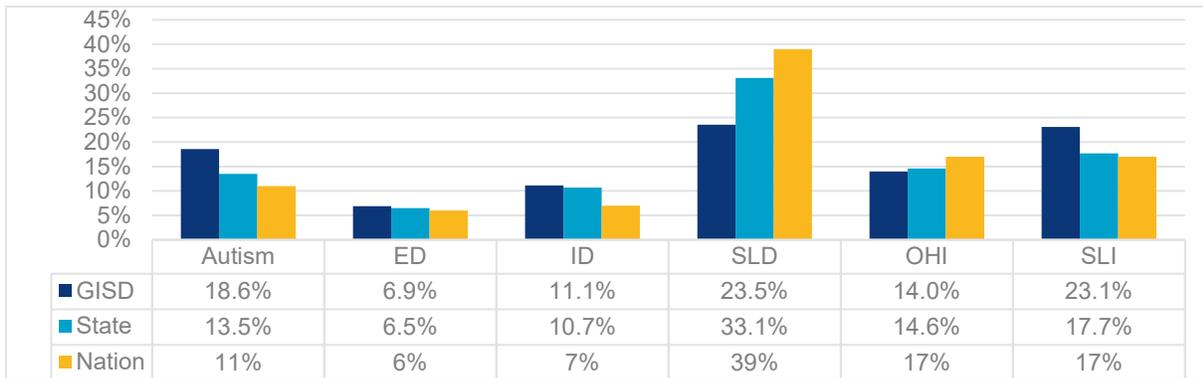
<sup>14</sup> In addition, in the Appendix information is provided for students receiving services under Section 504 of the Rehabilitation Act (Section 504) and who do not receive special education.

<sup>15</sup> Enrollment in Texas Public Schools 2019-2020 [https://tea.texas.gov/sites/default/files/enroll\\_2019-20.pdf](https://tea.texas.gov/sites/default/files/enroll_2019-20.pdf)

<sup>16</sup> The Condition of Education, National Center for Education Statistics @ [https://nces.ed.gov/programs/coe/indicator\\_cgg](https://nces.ed.gov/programs/coe/indicator_cgg) .

<sup>17</sup> The lower Texas rate is a continuing consequence of the state's action from prior years to monitor districts against the state's 8.5% maximum special education identification threshold. On January 11, 2018, the U.S. Department of Education's Office for Special Education and Rehabilitative Services found that TEA violated IDEA in various areas for outcomes associated with this monitoring action: <https://www.ed.gov/news/press-releases/us-department-education-issues-findings-texas-individuals-disabilities-education-act-monitoring>

**Exhibit 2. Composition of Identified Students by Disability Category for GISD, State and Nation**



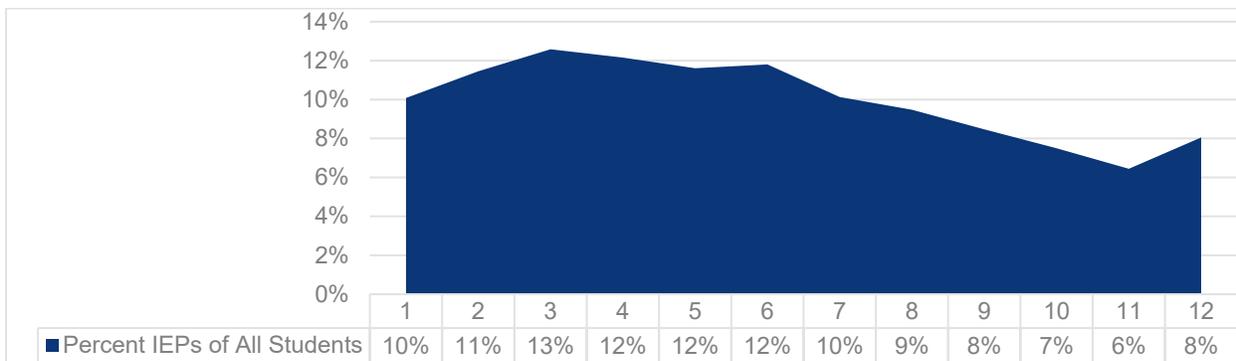
### Identification by Grade

The composition of students identified for special education by grade is described below for all students and by disability category.

### Identified Student Composition by Grade

The exhibit below displays the composition of all identified students by grade. This data shows a pattern of much larger percentages of identified students in earlier grades (2 through 6) compared to later grades (7 through 12). Rates peaked at grades 3 (13%) and then grades 4 through 6 (each as 12%). The rates gradually decreased to grade 11 with a low of 6%. Grade 12's higher percentage of 8% included students with IEPs who remained in school past the typical graduation age to receive transition services.

**Exhibit 3. Composition of All Identified Students by Grade**



### Identified Student Composition by Grade and Disability Category

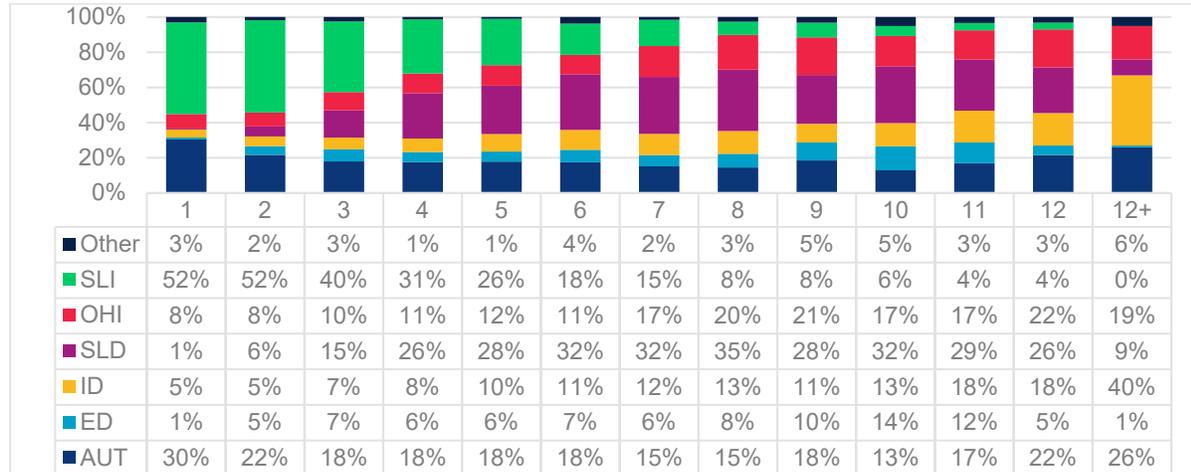
The exhibit below shows changes in the composition of all identified students by grades 1 through 12 by disability categories.

- **Speech/Language Impairment (SLI)** rates decreased from 52% to 0% from grades 1 through 12.
- Rates significantly increased for **other health impairment** (8% to 22%), **specific learning disability** (1% to 26%), and **intellectual disability** (5% to 18%) from grades 1 through 12.
- **Emotional Disturbance** rates increased significantly from grades 1 to 11 (1% to 12%). The figure suddenly decreased in grade 12 to 5%.<sup>18</sup>

<sup>18</sup> This could perhaps relate to students who dropped out of school.

- **Autism** reflected a different pattern, decreasing from 30% (grade 1) to 22% (grade 12). For the grades between, figures varied with no obvious pattern.
- **Grade 12+** refers to students 19-22 years of age, many of whom remain in school to receive transition services. The disability distribution at these ages was much different from the other grades, and in descending order were intellectual disabilities (40%), autism (26%), other health impairment (19%), specific learning disability (9%), and emotional disturbance (1%).

**Exhibit 4. Composition by Grade and Disability Categories**



Patterns shown in Exhibit 3 and Exhibit 4 above show the extent to which disabilities associated with poor reading/math achievement and behavior are identified in grade 3 and later when remediation is more difficult to achieve with specialized instruction/related services. Providing evidence-based, supplementary interventions to students demonstrating poor acquisition of reading, math, and age-appropriate behavioral skills earlier would either show positive growth or lead to an identified need for more specialized support.

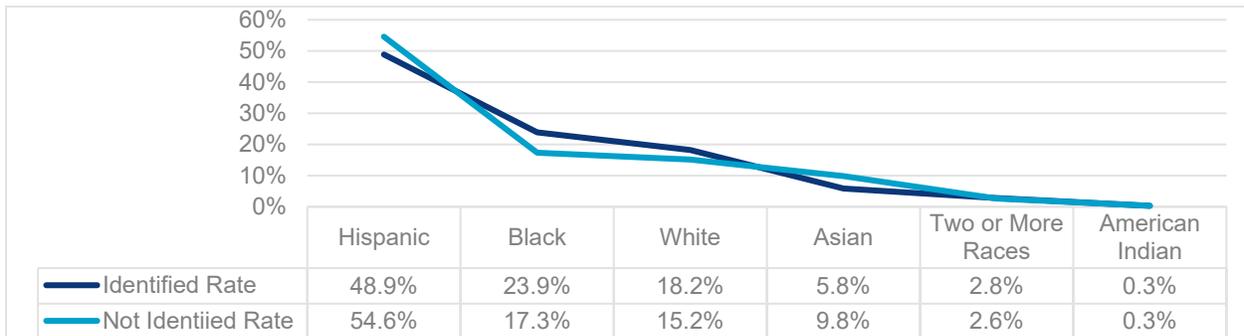
### **Identification by Race/Ethnicity**

The information below describes various patterns of GISD's identification of students eligible for special education and related services by race/ethnicity.

### **Composition of Students with/without IEPs by Race/Ethnicity**

The exhibit below shows the composition of students with and without IEPs by race/ethnicity. There were small rate differences between these two groups. Rates for Black (23.9%) and for white (18.2%) students with IEPs were higher than for their counterparts without IEPs (17.3% and 15.2%, respectively), with small respective rate differences of 6.5 and 3.1. Rates for Hispanic (48.9%) and for Asian (5.8%) students with IEPs were lower than their counterparts without IEPs (54.9% and 9.5%, respectively), with rate differences of -5.7 and -4.0 points, respectively.

**Exhibit 5. Composition of All GISD Identified and Not Identified by Race/Ethnicity**



**Composition of All Identified Students by Race/Ethnicity**

The exhibit below shows the composition of each racial/ethnic group of identified students based on associated total enrollments for each group. Of all Asian students, 6.2% were identified as needing special education. This composition rate was lower than non-Asian student group rates. Compared to Asian students, the 13.3% Black student composition was 7.1 percentage points higher, and rate differences for the other racial/ethnic student groups ranged from 5.6 points (white) to 2.9 points (Hispanic).

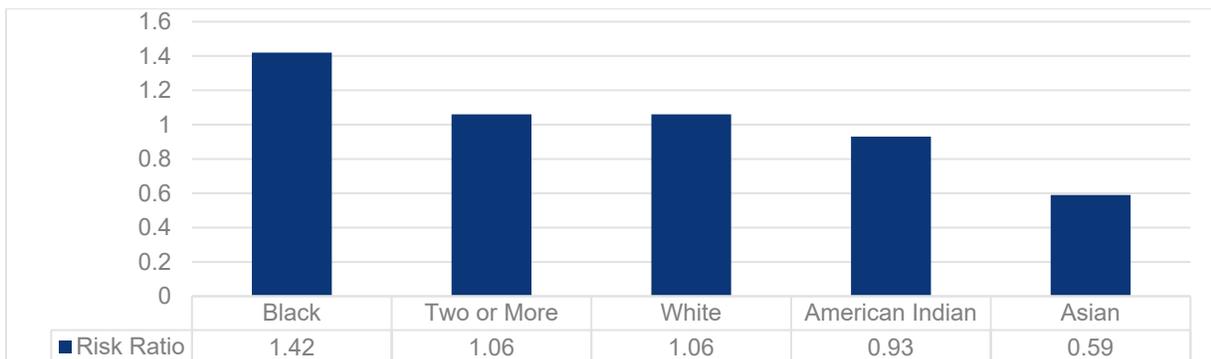
**Exhibit 6. Composition of All Identified Student by Race/Ethnicity & Rate Difference with Identified Asian Students**



**Risk Ratio for Identified Students by Race/Ethnicity**

As mentioned above, TEA monitors school districts for significant disproportionality using the risk ratio with a threshold of 2.5 to measure the extent to which each racial/ethnic group is more likely than others to be identified for special education. As the exhibit below shows, no racial/ethnic group had a risk ratio higher than 1.42 (Black students).

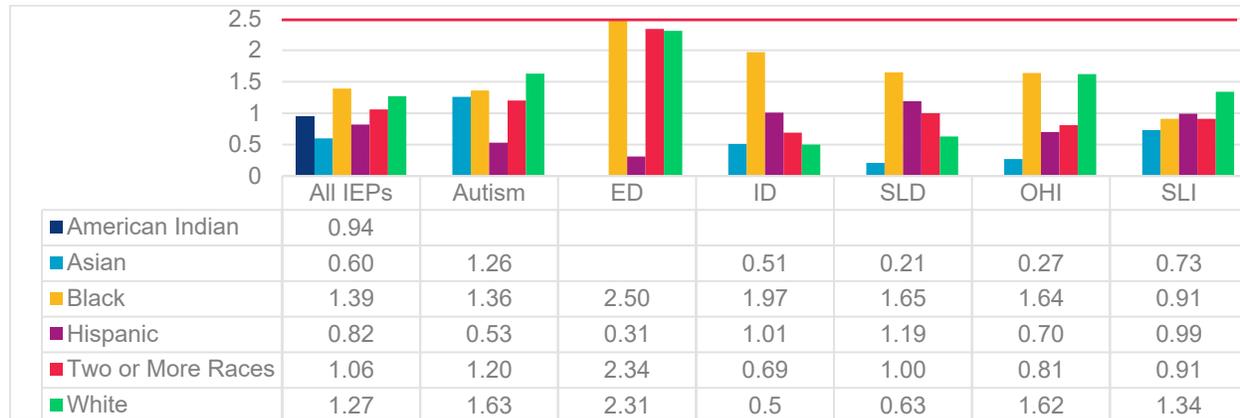
**Exhibit 7. Risk Ratio by Race Ethnicity and Disability Identification**



### Risk Ratio Analysis by Disability Category and Race/Ethnicity

TEA also monitors school districts' significant disproportionality by identification of students with one of six primary disability categories by race/ethnicity. As shown in the exhibit below, GISD Black students were 2.5 times more likely than non-Black students to be identified with an emotional disturbance (ED). Other risk ratios over 2.0 for ED were for students with two or more races (2.34 risk ratio) and white students (2.1 risk ratio). These results are due to the absent or very low number of students in other racial groups who were identified as ED. No other disability category had a risk ratio at/above 2.0, although with a risk ratio of 1.97, Black students came close for the area of intellectual disability.

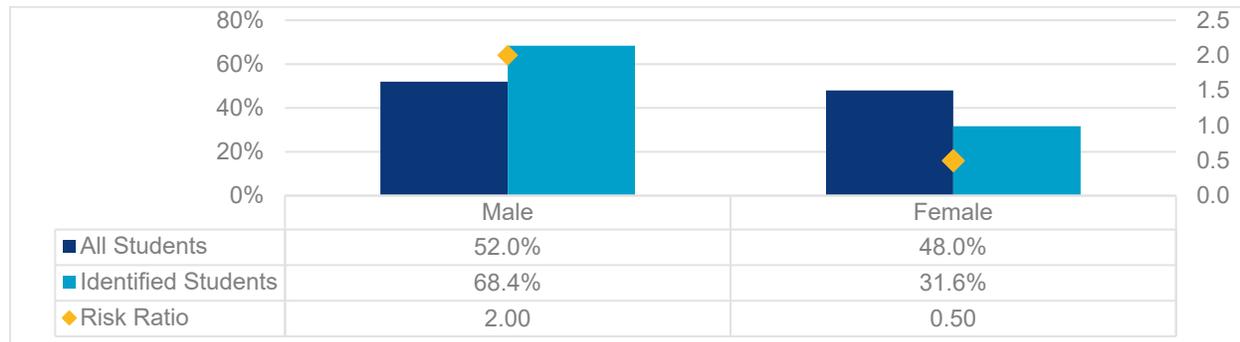
**Exhibit 8. Risk Ratios by All Disabilities and Six Disabilities Based on Race/Ethnicity**



### Identification by Gender

Of all GISD students, 52% were male, and 48% were female. Of all identified students, 68% were male, and 31.6% were female. Males were twice as likely as females to be identified.

**Exhibit 9. Compositions of All Students and Identified Students by Gender**

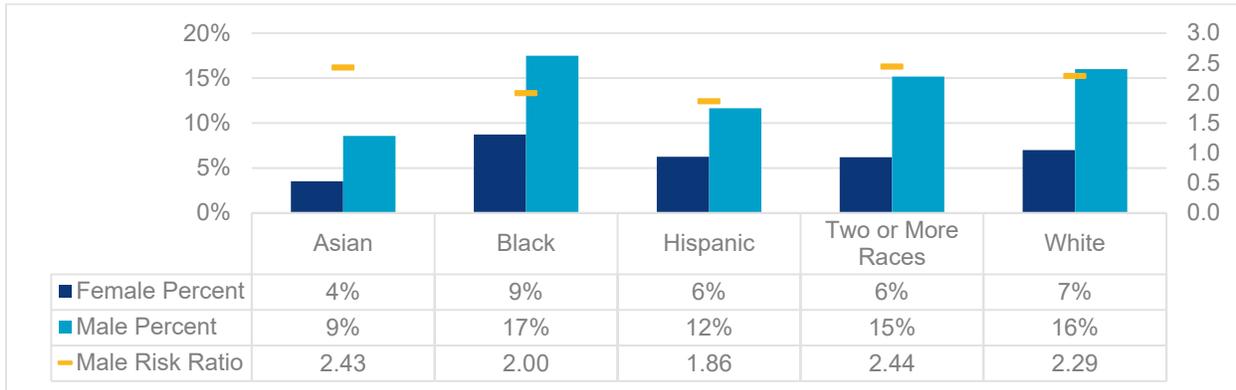


These race/ethnicity patterns change when considering gender by race/ethnicity, and gender by disability categories and by race/ethnicity. When the risk ratios above were calculated, they were based on male to female proportions.

### Identification by Gender and Race/Ethnicity

The exhibit below compares rates of female and male-identified students in each racial-ethnic group based on each group's total enrollment. In each racial/ethnic group, males were twice or more likely than females to be identified. The following were male risk ratios by race/ethnicity: students with two or more races (2.44), Asian (2.43), White (2.29), and Black (2.00).

**Exhibit 10. Of Each GISD Enrolled Racial/Ethnic Groups, Percent of GISD Male and Females with IEPs, and Male Risk Ratios**



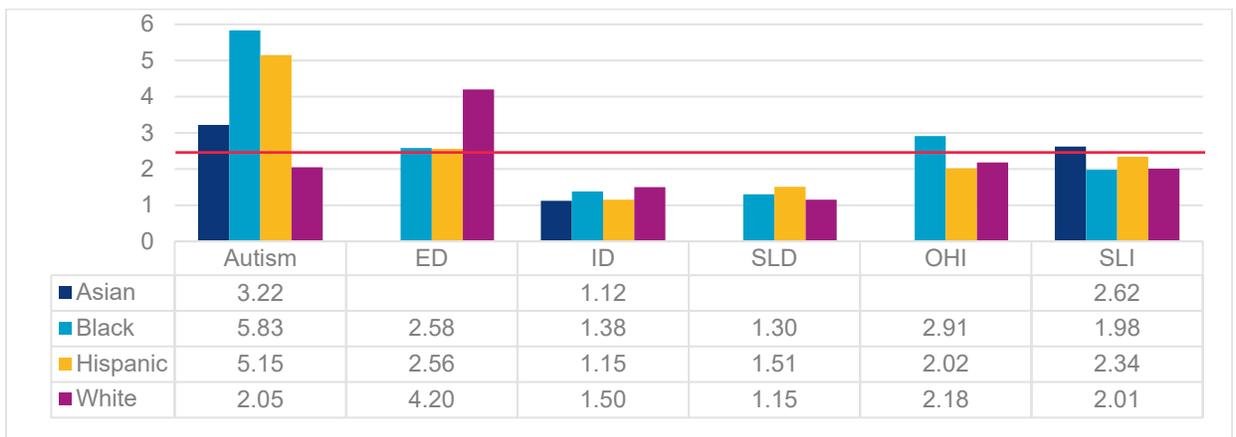
### Identification by Gender, Disability Category, and Race/Ethnicity

Male/female race/ethnic disparities are more pronounced when also considering primary disability. Male risk ratios were approaching or higher than 2.0 for the following disability and racial/ethnic groups. In other words, male students in the areas listed below were about or more than twice as likely than females to be identified for a disability category.

- **Autism.** Black (5.83), Hispanic (5.15), Asian (3.22), and White (2.05).
- **Emotional Disturbance (ED).** White (4.20), Black (2.58), and Hispanic (2.56).
- **Other Health Impairment (OHI).** Black (2.91), White (2.18), and Hispanic (2.02).
- **Speech/Language Impairment (SLI).** Asian (2.62), Hispanic (2.34), White (2.01), and Black (1.98).

Overall, Black, Hispanic, and white males were overidentified in four categories, and Asian students were overidentified in two categories. Only for intellectual disability (ID) and specific learning disability (SLD) were male risk ratios more comparable to females, with no male risk ratio in these categories higher than 1.51.

**Exhibit 11. Male Risk Ratios by Race/Ethnicity and Disability**



### Disability Identification by Free and Reduced Lunch Status

Overall, identified students were more likely than all GISD students to be enrolled in the Free and Reduced Lunch Program (FRLP) (3.1 risk and 2.39 risk ratio, respectively). Risk ratios were also higher for identified students with FRLP compared to those who were not regardless of their race/ethnicity or disability category.

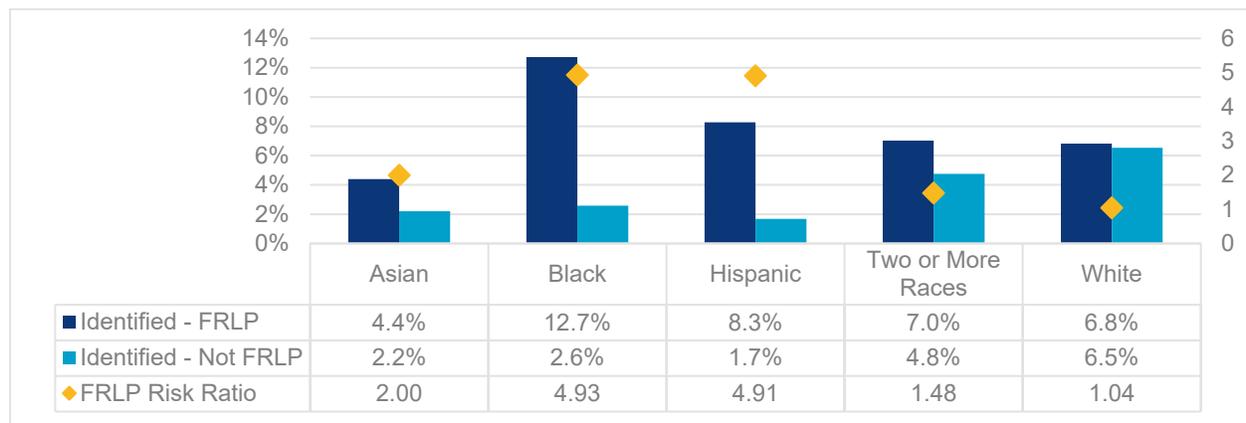
### Identification by FRLP Status and Race/Ethnicity

Based on all GISD enrolled students by race/ethnicity, identified students who were Black, Hispanic, and Asian students were much more likely than not to be enrolled in the FRLP.

- **Black Students.** 12.7% FRLP compared to 2.6% no FRLP (4.93 risk ratio).
- **Hispanic Students.** 8.3% FRLP compared to 1.7% no FRLP (4.91 risk ratio).
- **Asian Students.** 4.4% FRLP compared to 2.2% no FRLP (2.00 risk ratio).

There was very little likelihood that white students, or those with two or more races, were identified regardless of their FRLP status. Risk ratios were 1.04 for white students and 1.48 for students of two or more races.

Exhibit 12. Identification Rates by FRLP Status and Race/Ethnicity and FRLP to Not FRLP Risk Ratios

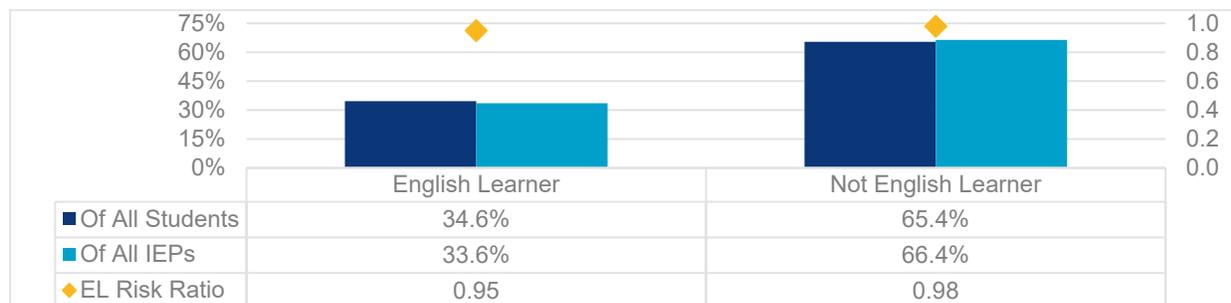


### Dually Identified Learners (English Learners with Disabilities)

#### Identification by English Learner Status

Of all GISD students, 34.6% were English learners (ELs), and 65.4% were not ELs. Of all students identified with a disability, 33.6% were ELs, and 66.4% were not EL. Overall, neither ELs nor non-ELs were likely to be identified (0.95 and 0.98, respectively).

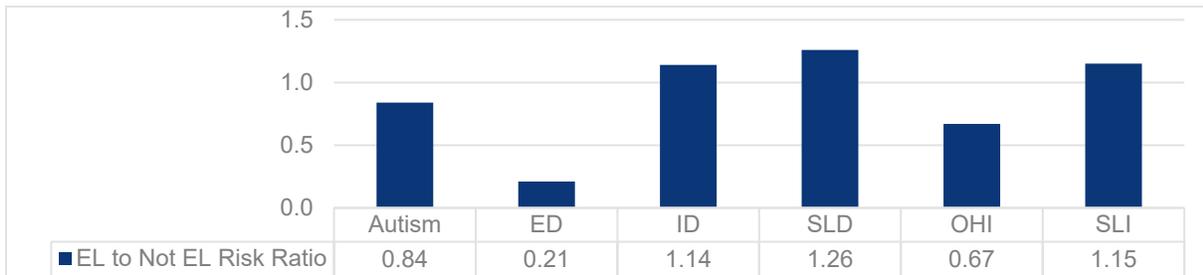
Exhibit 13. Percent of Students with IEP by EL Status



#### Risk Ratios by English Language Status and Disability Category

Of all English learners compared to non-EL students, ELs are not disproportionately identified in any disability category. EL risk ratios range from 1.26 (specific learning disability) to 0.21 (emotional disturbance). EL students are underrepresented in the ED category.

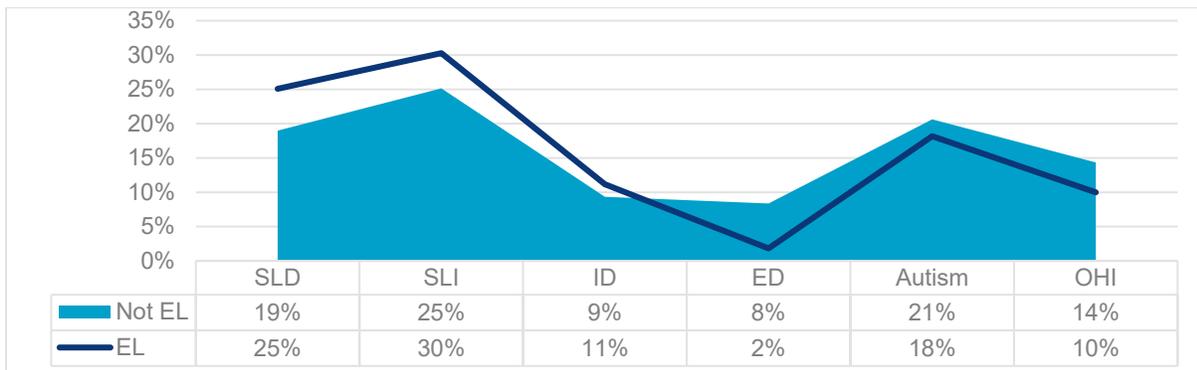
**Exhibit 14. Risk Ratios by English Language Status and Disability**



**Identification by EL and Non-EL Status and Disability Category**

Of all English learners and non-EL students, each group had different identification rates based on primary disability. Identified EL rates were higher than non-EL rates for specific learning disability (6-point difference) and speech/learning impairment (5-point difference). EL rates were lower than non-EL rates for emotional disturbance (6-point difference), other health impairment (4-point difference), and autism (2-point difference).

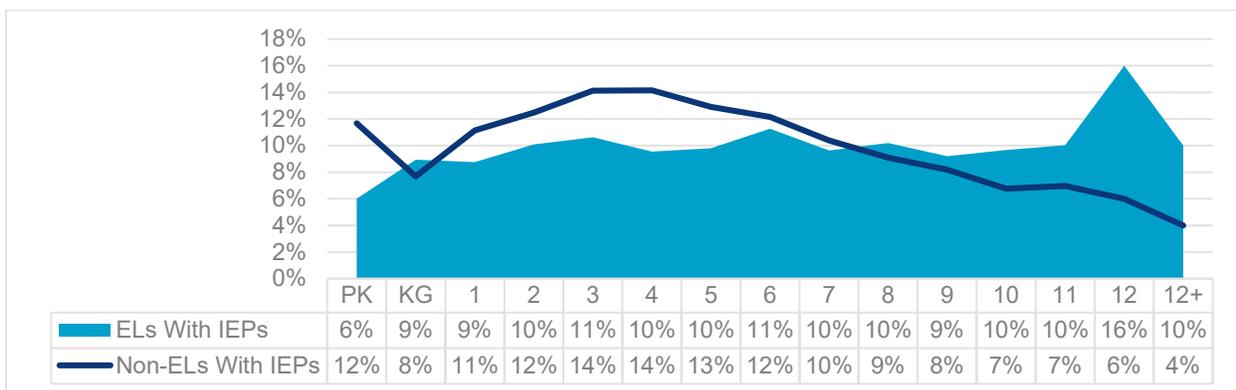
**Exhibit 15. Composition of Identified EL and Non-EL Students by Primary Disability**



**Identified EL and Non-EL Student Composition by Grade**

Different patterns emerged for identified EL and non-EL students by grade. EL rates were higher than non-EL rates with small rate differences in kindergarten (1.3 points) and grades 8 through 11 (1.0 to 3.1 points). The rate difference was much higher in grade 11 (10 points) and grade 12 (6 points). EL rates were lower than non-EL rates in pre-kindergarten (5.7 points); and grades 1 through 7 (0.7 to 0.9 points).

**Exhibit 16. Identified EL and Non-EL Student Composition by Grade**



### Twice-Exceptional Learners (Gifted and Disability)

The term “twice exceptional” is often used to refer to students identified as gifted and with a disability. Overall, small percentages of GISD students identified as having a disability through either IDEA (1.95%) or Section 504 (6.40%) were found to be gifted. When combining these two groups, the overall percentage was 3.81%.

### Twice-Exceptional Composition by Race/Ethnicity

By far, White students had the largest twice-exceptionality rate (2.32%), and White students were 6.71 times more likely than non-White students to be identified with a disability and as gifted. With a risk ratio of 1.40, 0.92% of students with two or more races were twice-exceptional. All other racial/ethnic groups had risk ratios of 0.80 or less.

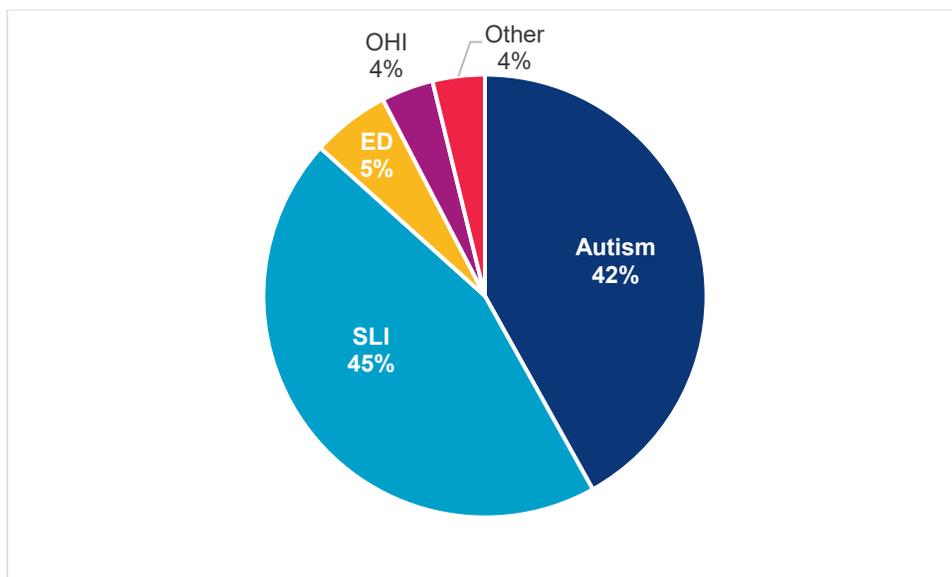
Exhibit 17. Gifted Status by IDEA/504 and Race/Ethnicity (Percentage Based on Total Race/Ethnicity Group)



### Twice-Exceptional Composition by Disability Category

Of all twice-exceptional students, 45% were identified for speech/language impairment, 42% for autism qualified, 5% were emotional disturbance qualified, 4% were other health impairment qualified, and 4% were qualified in another area.

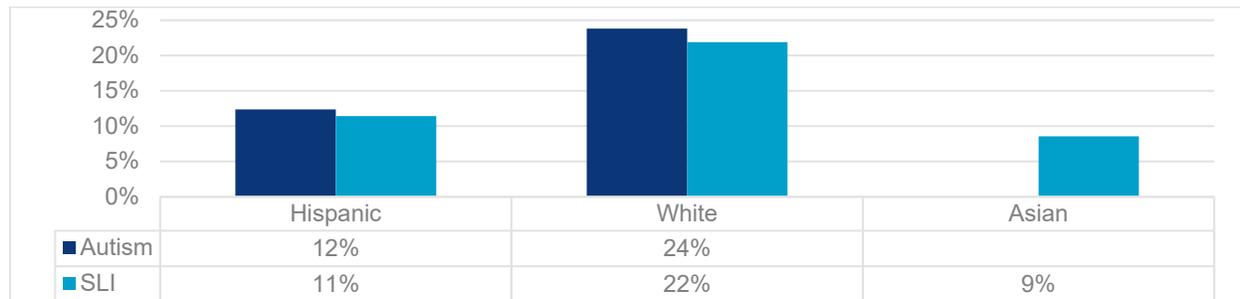
Exhibit 18. Gifted Status by IDEA/504 and Race/Ethnicity (Percentage Based on Total Race/Ethnicity Group)



### Students Identified by Disability Category and Giftedness by Race/Ethnicity

Of all students identified with autism and giftedness, 12% were Hispanic, and 24% were White. Of students identified with speech/language impairment and giftedness, 11% were Hispanic, 22% were White, and 9% were Asian. No other racial/ethnic group or disability category had ten or more twice-exceptional students.

**Exhibit 19. Percent of Students Identified by Disability Category and Giftedness by Race/Ethnicity**



## IV. LEARNING ENVIRONMENT AND SPECIALIZED SERVICES

### Multi-Tiered System of Supports

Multi-Tiered System of Supports (MTSS) is an intervention and instructional framework that creates the necessary systems to ensure all students have access to a high-quality educational experience. This section reviews GISD's progress towards implementing an MTSS framework across campuses. While intervention supports are offered as a core component of the general education curriculum, successful implementation of MTSS will reduce unnecessary referrals to special education.

#### **MTSS Framework**

The provision of instruction, interventions and support to students within a framework of Multi-Tiered System of Supports (MTSS) improves educational outcomes for all students, including those with Section 504 Plans and IEP, and others who are EL and/or gifted/talented.<sup>19</sup> The framework focuses on prevention and the early identification of students who may benefit from instructional and behavioral interventions, as well as acceleration, that remove barriers to learning.<sup>20</sup> When implemented as intended, MTSS leads to increased academic achievement by supporting rigorous core instruction, strategic/targeted interventions, and improved student behavior. Furthermore, the framework has been successfully used to support a reduction in disproportionate special education referrals of students based on race, gender, socioeconomic or English learner subgroups. Reflecting on the growing recognition of MTSS as a system-wide framework for supporting student achievement and positive behavior, the Every Student Succeeds Act (ESSA) includes MTSS as a permissible usage of Title I funds. The Act defines MTSS as "a comprehensive continuum of evidence-based, systemic practices to support a rapid response to students' needs, with regular observation to facilitate data-based instructional decision-making."<sup>21</sup> MTSS provides an overall framework for structuring and coordinating the provision of core instruction along with additional behavioral support, such as behavior modifications or mental health supports, some students require so that all are successful. MTSS is centered on a tiered system of support, where every student receives high-quality core instruction, known as Tier 1. Some students need supplemental instruction, which is referred to as Tier 2, and a small cohort of students receive the most intensive intervention and supports, known as Tier 3. Movement among these tiers should be fluid. A student with acute needs does not need to progress through the tiers to get individualized support, and a student who needs extra support should not miss core instruction that is provided in Tier 1.

Under the MTSS framework, core instruction is evidence-based, rigorous, and of high quality. By utilizing a universal design for learning system, learning differences are considered proactively rather than reactively. The instruction is culturally relevant, linguistically appropriate, and is implemented with integrity for all students. The framework is based on a presumption that some students require additional instruction in order to achieve grade-level standards. Increasingly intensive tiers of academic and social/emotional support are targeted to meet student needs based on data-based problem-solving and decision-making; instruction is adjusted to continually improve both student performance and the rate at which it progresses. Furthermore, the process is used to assess (using student responses to the instruction) the effectiveness

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<sup>19</sup> See the Council of the Great City School's document, Common Core State Standards and Diverse Students: Using Multi-Tiered Systems of Support that outlines the key components of an integrated, multi-tiered system of instruction, interventions, and academic and behavioral supports needed by school districts in the implementation of the Common Core State Standards. The document is applicable also to school districts in states that have not adopted these standards.

<sup>20</sup> MTSS reflects the merger of response to instruction/intervention (RTI2), which typically focuses on academic achievement, and a system used to focus on improving positive behavior support.

<sup>21</sup> Elementary and Secondary Education Act, as reauthorized in 2015.

of the tiered instruction/interventions being implemented. Many states have established intervention systems that align to the core tenets of the MTSS process and branded them accordingly.

### **Texas Guidance**

In Texas, MTSS has been adopted as the Texas Multi-Tiered System of Supports. The Intervention Best Practices Statewide Leadership Network developed guidance, including professional development modules, about MTSS, for districts across the state. These materials include best practices and an MTSS framework that districts may use to guide their implementation of MTSS. The MTSS framework and guidance started to be released during the first part of the 2019-20 school year. TEA describes MTSS as a framework that “encompasses supports for the whole child, and takes into account academics, behavior, and social/emotional supports.”<sup>22</sup> At this time, there are no plans to mandate MTSS or any specific minimum standard or process. The guidance also notes that “students who are struggling with reading, or showing early risk factors associated with dyslexia, may receive interventions through MTSS and that a referral for a full individual and initial evaluation (FIIE) can occur at any point in the MTSS process.”<sup>23</sup> MTSS is not required prior to any referrals for special education services.

### **District Guidance and Practices**

Though focus group participants used the term MTSS, the district’s website references Rtl as the adopted intervention framework. As described on the website:

Rtl is a collaborative approach to meeting the needs of our students with the instruction they need for learning success. The goal of Rtl is to prevent students from falling behind and developing learning difficulties. The process includes early identification when students begin to struggle with learning or behavior. The process focuses on three areas of the classroom experience: Mathematics, Reading, and Behavior.<sup>24</sup>

Participants also shared that training specific to MTSS has occurred annually for administrators, counselors, and interventionists. The training involves reviewing Tier 1, 2, and 3 criteria, paperwork requirements, and who needs to be involved in each student support meeting. These in-person trainings typically occur in September of each school year. For the 2020-21 school year, the trainings occurred virtually in an asynchronous manner.

GISD has developed extensive guidance documentation to assist school teams with understanding and implementing interventions. Guidance manuals and training documents shared with PCG include:

- Secondary RTI and SST Training Manual, developed by the Intervention Department
- RTI Reference & Procedure Guide for Student Support Teams (SST), 2018
- RTI and SST Training, developed by the Intervention Department, 2020-21
- Behavior RTI, 2017-18
- Secondary Intervention Meeting Guidance by Tier, 2017
- Elementary Intervention Meeting Guidance by Tier, 2018
- Accommodations in General Education Classroom, 2007

Many school-based staff participants in focus groups were uncertain if an Rtl, or an MTSS, guidance manual existed. It could be that because these guidance documents are several years old, school staff were not aware that they existed.

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<sup>22</sup> “MTSS Questions and Answers”, TEA, [https://tea.texas.gov/sites/default/files/TEA%20MTSS%20QA-Final\\_accessible%20PPT.pdf](https://tea.texas.gov/sites/default/files/TEA%20MTSS%20QA-Final_accessible%20PPT.pdf)

<sup>23</sup> “MTSS Questions and Answers”, TEA, [https://tea.texas.gov/sites/default/files/TEA%20MTSS%20QA-Final\\_accessible%20PPT.pdf](https://tea.texas.gov/sites/default/files/TEA%20MTSS%20QA-Final_accessible%20PPT.pdf)

<sup>24</sup> GISD RTI Guidance, website, <https://www.garlandisd.net/content/response-intervention-rti>

Focus group participants also shared a variety of feedback about the overall structure of MTSS. The following is a summary of their comments:

- Some said that at one point there was a clear intervention system in place but that that has since gone away. Others said there is inconsistency and that practices differ from campus to campus.
- One overall request was for school staff to have a better understanding as to how to support students through each tier and to have tools to help them problem solve why students are not making progress.
- There is a perceived breakdown between the elementary and middle schools regarding intervention plans for students.
- One participant said that the campus can sometimes lose a year trying to figure out how to help students when the teacher has not documented data or intervention progress properly.
- MAP testing is considered the “Cadillac” of testing and if there was a focus on getting that student-specific data into the hands of teachers, teams might be better equipped to help identify specific student knowledge gaps.
- Many expressed concerns about the impact that remote learning has had on students and that they are seeing increases in failure rates by 25 percent or more from cycle to cycle. Many wondered what interventions could be used to help these students.

### ***Core Curriculum and Universal Design for Learning***

Focus group participants shared that the majority of the curriculum is written at the district level and then provided for individual classroom teachers to use when planning and implementing in their classrooms. Curriculum staff and teachers have been working on rewriting core content in pre-kindergarten through 12th grade, based on the goals from the district’s strategic plan. An important aspect of this rewriting process has been to include more engaging and technology-based activities, and there is an emphasis on developing online curricular tools that teachers can easily access. Some focus group participants said that teachers will, at times, supplement the core curriculum with other purchased resources. Campuses also occasionally buy additional materials, such as Fountas & Pinnell’s Leveled Literacy Intervention System (LLI), though they are not officially approved by the district.

The district has been considering implementing Universal Design for Learning (UDL), but the interruptions caused by the pandemic slowed down this progress. This topic is one up for additional consideration once the 2021-22 school year is underway. Another goal of the Curriculum & Instruction Department is to move core curriculum content to an Understanding by Design (UBD) framework. The district has so many curricular resources that many focus group participants said it is difficult for new teachers to know where to begin and what to prioritize.

### ***District Leadership***

Several offices and departments coordinate efforts related to MTSS. The Academic Office, including the Special Education, Intervention, and Guidance and Counseling Departments, and the Leadership Office, including Student Support, Health Services and Campus Leadership, all play integral roles in the work. One participant said that the Intervention Department technically oversees MTSS, but there is no implementation plan that involves the input or work of the other offices and that is a “chaotic” system.

Focus group participants said that there is no formal structure or leadership team driving a coordinated vision of MTSS. Discussions about MTSS often occur at cabinet meetings, but these meetings are not necessarily dedicated to developing a consistent and synchronized approach for both academics and behavior across all campuses.

### ***Student Support Teams***

Many school-based focus group participants shared general descriptions of how student support teams (SSTs) function on their campuses. In some places, these teams are called RTI teams. SSTs vary from

campus to campus. Most described these teams as being focused on looking at student data and creating an intervention plan for students who are struggling. Many also mentioned professional learning communities (PLCs) as the first place that student concerns are discussed. They also described interventionists as key support in elementary schools for Tiers II and III, instructional coaches in middle school, and RTI facilitators in high school. In most schools – but not all - counselors play a critical role in coordinating the SST. Some said that teachers in their buildings frequently ask other teachers for assistance, even though there is a designed student support team in their school.

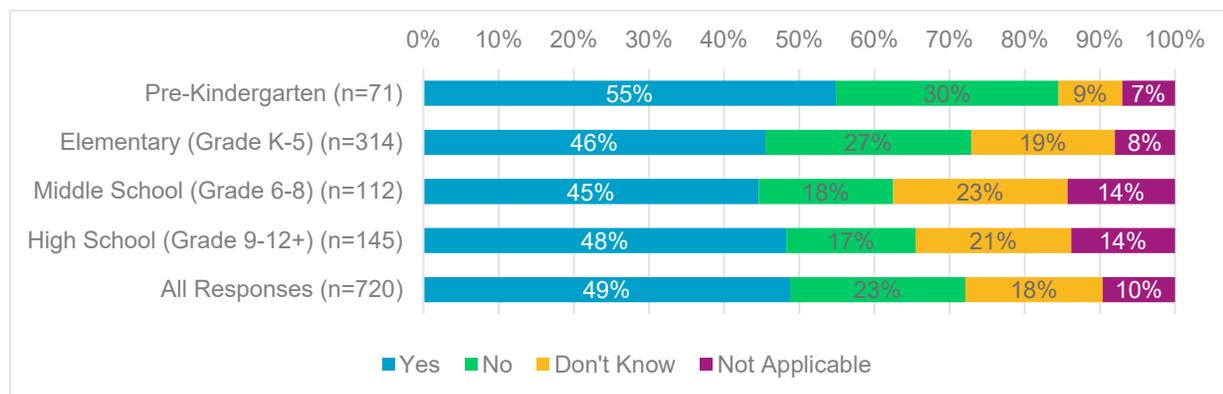
Focus group participants also shared a variety of descriptions as to how the intervention process worked on their campuses.

- “We don’t have a set routine we are to follow. My first step is to involve the parent; then go on to the counselor then the interventionist.”
- “Our school put into place that interventionists would take over more of the process so the counselor could focus more on the 504.”
- “We didn’t receive any training, so we are learning as we are going. We are learning by our mistakes. The process could be streamlined if someone had told us what we needed to do.”
- “SST meetings are scheduled are when parents ask for a meeting.”
- “When a counselor brings a student for a referral, I ask ‘have you looked in their cum(ulative) file?’ Sometimes, the information on RTI has not gotten carried over in the student record from elementary to middle school.”
- “Counselors are part of the child-find process. Their involvement in providing support to the students leads to them being the main person behind all of it.”
- “Counselors are being used as clerical support for RTI and not being utilized for intervention support. They have been assigned to schedule meetings, get paperwork together, contact families. I’m not sure if they are always invited to provide input.”
- “There are a lot of cooks in the kitchen – teachers, child’s parent, counselors, administrators, and interventionists – and a lot of steps in the process that are redundant like multiple pieces of paperwork.”
- “We use the Tier III model, but it is a very lengthy process – at that point there is so much that should have already done.”

### Parent Survey

Of all parents who responded to the survey, 49 percent indicated their child received interventions prior to a referral for special education evaluation, while 23 percent indicated their child did not receive interventions prior to a referral.

**Exhibit 20. Parent Survey: My child received interventions prior to a referral for special education.**



## ***Data Use and Progress Monitoring***

According to the National Center for Rtl:<sup>27</sup>

Progress monitoring needs to pay attention to the fidelity of implementation and selection of evidence-based tools, with consideration for cultural and linguistic responsiveness and recognition of student strengths. Data obtained from progress monitoring help staff assess whether students are making an adequate rate of progress and it provides information for problem solving around what may not be working for individual students or groups of students. In some instances, the problem may be the integrity or fidelity with which the instruction or the intervention is delivered. District protocols can provide guidance for defining progress-monitoring requirements for instruction and interventions.

Focus group participants shared various ways that they use data to assess progress and the fidelity of interventions as part of the MTSS process. Most mentioned monthly data meetings on their campuses and the use of progress monitoring data when making student intervention decisions. Some talked about weekly data reviews during PLCs. In some cases, there are staff in the building who are strong with data and help their peers with analysis.

School-based staff said that their campuses generally review data, specifically MAP results, three times per year (beginning, middle, and end of year). High schools also review STAAR data to identify students in need of additional support in certain areas. Staff from one campus said they review progress with interventions every 45 days, but this was not identified as a consistent practice in other buildings. Though teachers are likely collecting a lot of data, a few participants shared that they have concerns teachers may not know how to put it together in a way that helps the SST with understanding the impact of an intervention or the diagnostician if a referral is initiated.

## ***Intersession***

For the 2020-21 school year calendar, Garland ISD adjusted the school calendar and began a program called Intersession. As described on the Garland ISD website:<sup>25</sup>

Intersessions are strategically scheduled to provide intervention, enrichment, and accelerations following a grading cycle, rather than delaying these experiences until the summer. For intervention, the ability to provide students with these more immediate recovery opportunities will reduce the likelihood of compounding knowledge gaps when new grade-level content is presented, and students do not possess the requisite skills.

Intersessions are designed to:<sup>26</sup>

- help address the "summer slide", or the decline in student performance that typically happens during long breaks
- manage the anticipated long-term impact of COVID-19
- provide intervention, enrichment and acceleration opportunities
- be built into the school year to provide timely student support and give extra flexibility to respond to student needs
- provide more immediate recovery opportunities to reduce knowledge gaps

These sessions take place in the fall, spring, and summer to support and improve the academic achievement for all students. Students who attend receive individualized instruction tailored to their specific needs. Each campus offers its own Intersession and communicates with parents what courses are being offered. Special sessions such as dyslexia, ELL support and AVID are provided by the district at "hub" campuses or virtually. Students are encouraged to attend if they have skill deficits identified by a universal

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<sup>25</sup> GISD Intersession guidance, website, <https://www.garlandisd.net/content/intersession-0>

<sup>26</sup> GISD Intersession guidance, website, <https://www.garlandisd.net/content/intersession-0>

screeener, standardized test results, formative assessments, or cycle/course failures; need accelerations to improve performance on assessments, boost course credits and/or prepare for college assessments; or would like to have enrichment through curriculum extension, including camps<sup>27</sup>. Some students receive invitations for specific sessions. Campuses analyze data, typically during their Professional Learning Communities (PLCs), to determine student session invitations. Once a student has received the invite and confirmed their attendance, their teachers use the student's data to create specific lessons tailored to their academic needs.

There were 17 Intersessional days during the 2020-21 school year, and there will be 21 Intersessional days in the 2021-22 school year. For the first Intersession, 8,700 students participated, of which approximately 350 were students with IEPs. Over 12,000 students attended the second session. The student to teacher ratio is 15:1. The Department of Curriculum & Instruction provides the curriculum to be used in Intersession, and teachers individualize the instruction based on what students need.

Focus group participants shared that because Intersession was still new, they were not able to assess its long-term benefits yet. However, many said that adding 17 extra instructional days was a positive step for the district toward helping students who were struggling, especially given missed instructional time due to the pandemic, and that, overall, they believe the sessions so far have been successful. There is a general sense that students enjoyed the sessions, with “brain breaks” and virtual field trips designed to add elements of fun to the academic activities.

School staff also expressed that some challenges with implementing a new program of this scale. They shared a variety of feedback:

- “One tricky part is that students in a self-contained unit, you need a specific teacher who is trained to work with those students. If you have someone from another school, then you would have to provide a teacher that could get up to speed on that student's IEP.”
- “Because we can't require it or turn anyone away, you will have students who are high performing (parents don't have childcare) enroll, while students who are really struggling might not or can't get the attention/support they need.”
- “Having it be on a volunteer basis makes it tough to get teachers to sign up.”
- “In theory it's great, but we've discovered that, having to have it at our own school, it's challenging.”
- “We can't have more than 15 students per teacher, and 15:1 is not a good model for intervention.”
- “Having to figure out attendance, meals, and what it looks like at our campus is hard.”
- “Not everyone likes working it because they would rather have the break.”

Based on the feedback from the initial sessions during the 2020-21 school year, continued enhancement of Intersession is underway. In future sessions, the district will be setting up criteria to make it “almost” mandatory for some students to come and will be adding additional support in math and reading for those students who are really struggling. Some of the campuses are exploring adding robotics sessions and other activities to their offerings.

## ***Enrollment Center***

Garland ISD operates an Enrollment Center for incoming students and their families. The center offers language testing and a variety of health and related services. It is the first stop for students who speak a language other than English. For students who have significant physical disabilities and limited formal schooling experience in their home countries, the Enrollment Center coordinates with the Special Education Department.

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<sup>27</sup> GISD Intersession guidance, website, <https://www.garlandisd.net/content/intersession-0>

The clinic at the Enrollment Center offers a full-time registered nurse and clinic assistant as part of its staff. Services include:

- Immunizations
- Community Partner program
- Counseling Institute
- Dental assistance
- Nutrition/diabetes prevention classes
- Service organization referrals
- Vision clinics<sup>28</sup>

The center also reviews paperwork from other school districts and contacts them to ensure the appropriate services are identified and coordinated for incoming students.

## Referral Practices

### *Referral Process and Timeline*

In GISD, the referral process to determine initial eligibility for special education services is bound to a 15-school day response timeline when submitted in writing. Specifically, when a written request is provided to a local education agency's (LEA) director of special education services or to a district administrative employee for an initial evaluation for special education services, the school must, not later than the 15<sup>th</sup> school day after the date the school receives the request, either give the parent: 1) prior written notice of its proposal to conduct an evaluation, a copy of the Notice of Procedural Safeguards, and the opportunity to give written consent for the evaluation; or 2) prior written notice of its refusal to evaluate the student and a copy of the Notice of Procedural Safeguards.<sup>29</sup> A verbal request for a special education evaluation does not require GISD to respond within the 15-school-day timeline.<sup>30</sup> It is important to note that a student is not required to pass through all levels of MTSS prior to submitting a referral for a full individual and initial evaluation (FIIE).

Often, students will participate in the MTSS or SST process prior to a referral for special education services being submitted. Focus group participants shared thoughts on how the length of the referral process and required documents may negatively impact a student's academic growth. Most mentioned a general confusion about what data is necessary as part of the initial referral process and having clarity on what the referral process entails so the process can be completed efficiently.

Focus group participants shared the following about the special education referral process and timeline:

- "Sometimes teachers have a difficult time understanding the referral process, and taking data in order to move students along. Every year it feels like starting over how the process works because we don't do it every day. If teachers had a better understanding of how that process works, it would be helpful."
- "It's beneficial for the diagnosticians to know what intervention was used, for how long, and with what result."
- "The process takes a while, especially for kindergartners, even if we see them struggling earlier on. There are some instances where they don't want to test in kindergarten, then the student gets to first grade and is still struggling. Then, they move on to second grade without help. I know of one student who does not talk in 3rd/4th grade and has not been identified."
- "The process to get an IEP in place sometimes takes too long."

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<sup>28</sup> Additional detail on these services can be found at: <https://www.garlandisd.net/content/enrollment-center-clinic>

<sup>29</sup> Parent's Guide to the Admission, Review, and Dismissal Process July 2020

<sup>30</sup> Parent's Guide to the Admission, Review, and Dismissal Process July 2020

- “There is something broken in the system to get general education students into special education. They are told to document, but then ask for different documentation – ‘no, that’s not right, that’s right.’ Every time they (teachers) are trying to document it’s not the right thing. It seems to be a broken system.”
- “Special education is a crutch that a lot of teachers are using – they didn’t want to spend the time to help that student to overcome academic shortcomings and think special education will solve it.”

Staff capacity to complete initial evaluations to determine eligibility for special education and related services was identified as a concern amongst focus group participants. There was an overall increase reported in the number of evaluations to be completed. One focus group participant reported they complete between 80 and 100 evaluations, while a diagnostician in a comparable district may complete 70 evaluations, as reported by the focus group participant. Prior to the pandemic, a respondent stated they completed close to 100 evaluations before spring break and reported that the number was increasing. As of January 2019, it was reported that GISD received 605 referrals for an initial evaluation when compared to 373 referrals in January 2018.

Diagnostic staff, including diagnosticians and Licensed Specialists in School Psychology (LSSPs), also expressed some challenges with adhering to timeline expectations and maintaining quality evaluations. They shared a variety of feedback:

- “There are not enough staff in the district to do an assessment during the summer when we are closed so it delays the process.”
- “We always do more evaluations because if you miss a timeline then you get ‘in trouble’ with the district rather than being provided more assistance.”
- “Last spring before COVID, we were not able to follow best practices.”
- “We spend a lot of time testing students.”
- “Some of the referrals are not clear or specific; some require us to do more testing on a student than the student should have to undergo.”
- “The district (GISD) is chronically understaffed, especially with a Speech Pathologist who could do an assessment for kids. It takes as long as it legally can take – referred in November, tested in March, and seen in April. Speech Pathologists are overwhelmed with meeting service minutes then they can’t do evaluations in a timely manner.”

It is important to consider that the quality of the assessment and evaluation process can become compromised when the workload exceeds existing staff capacity and that it is critical that evaluation findings are both valid and reliable, as assessment data serves as the basis for the ARD committee to determine a student’s eligibility for special education and related services.

## ***Determinations***

The ARD committee convenes following the completion of the initial evaluation report to determine a student’s eligibility for special education and related services. According to the GISD Parent’s Guide to the ARD Process (2020), the ARD committee members must include the following:

1. The parent;
2. At least one regular education teacher of the child who must, when possible, be a teacher who is responsible for implementing a portion of the student’s IEP;
3. At least one special education teacher or provider of the child;
4. A representative of the school;
5. A person who can interpret the instructional implications of the evaluation results;
6. Other individuals who have knowledge or special expertise regarding the student and are invited by either the parent or the school;
7. Whenever appropriate, the student;

8. To the extent appropriate, with the parent's written consent, or after the student reaches age 18, with the parent's written consent, a representative of any participating agency this is likely to be responsible for providing or paying for transition services;
9. A representative from career and technical education, preferably the teacher, if the student is being considered for initial or continued placement in career or technical education; and
10. A professional staff member who is on the language proficiency assessment committee, if the child is identified as an English learner.

The initial eligibility meeting, held by the ARD committee, must make an eligibility determination within 30 calendar days from the completion of the initial evaluation report. Focus group participants provided feedback as to how the initial evaluation and eligibility determination process worked on their campuses:

- "It's rare that they (students) don't qualify for something once they've been tested"
- "If a student is not found to need services, we just do our best to work with them. They stay at Tier II."
- "Staff (diagnosticians and LSSPs) who are identifying students go above and beyond to correctly diagnose."
- "I believe that there are gaps in assessments used in the identification process."
- "Testing results are sometimes too high to qualify for special education and students are left struggling their whole time in school. We're doing them a disservice."
- "In elementary schools, evaluations are very thorough because they are often the first ones. They are more in-depth than at middle and high."

It is important to note that focus group participants interchangeably used the terms "diagnosis" and "educational classification." GISD staff often used the language of "providing a diagnosis" for a student when in fact, they are determining eligibility for special education and related services according to educational disability criteria.<sup>31</sup> ARD team members are not acting in the capacity of a medical professional diagnosing. Rather, they are reviewing data from the evaluation team to determine if the delays present: 1) have an educational impact requiring specialized instruction that are not due to lack of instruction in reading and math or limited English proficiency, and 2) meet eligibility criteria in one of 13 disability classifications.<sup>32</sup> GISD staff must continue to be mindful of using contextually accurate language with fellow colleagues and parents.

As previously noted, parents are mandatory members of the ARD committee. Eligibility decisions cannot be made prior to convening the initial ARD meeting or in the absence of parent input<sup>33</sup> Parents were surveyed to determine: 1) if they were invited to meet with the school team about their child's progress and a referral for special education evaluation before signing consent, and 2) whether school staff discussed with the parent program placement prior to their child being referred for special education. Overall, ninety percent of parents reported that they had the opportunity to meet with their child's school team prior to signing consent for a special education evaluation. That percentage steadily decreased as students progressed through school, with Pre-K parents reporting ninety-five percent to parents of high school students reporting eighty-three percent.

## Parent Survey

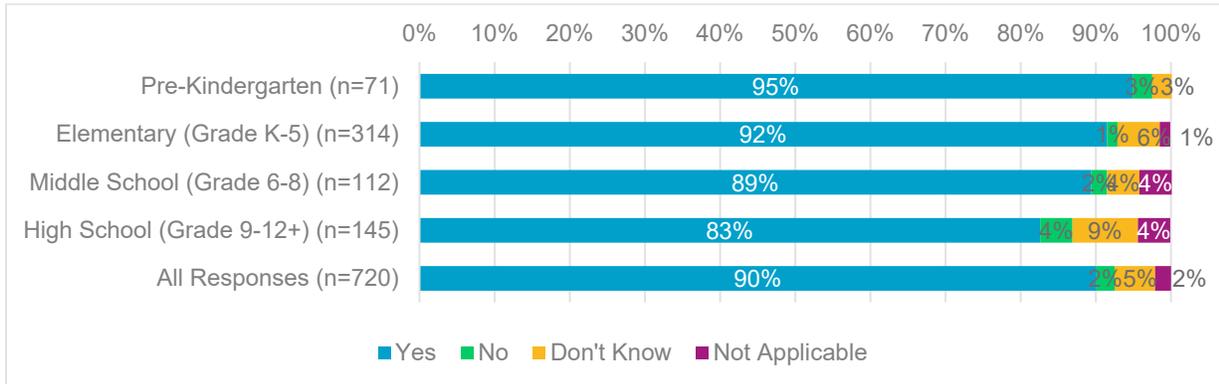
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<sup>31</sup> IDEA Regulations, US Dept of Education, <https://sites.ed.gov/idea/regs/b/d/300.306/c>

<sup>32</sup> IDEA Regulations, US Dept of Education, <https://sites.ed.gov/idea/regs/b/d/300.306/c>

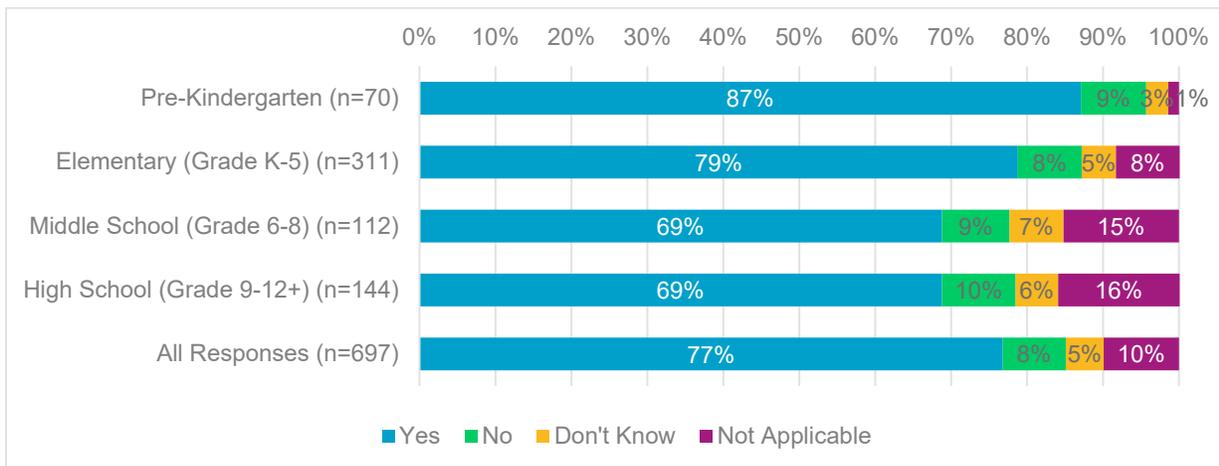
<sup>33</sup> Parent's Guide to the Admission, Review, and Dismissal Process July 2020

**Exhibit 21. Parent Survey: I was invited to meet with the school team about my child's progress and a referral for special education evaluation before I signed consent.**



A majority of parents (77 percent) indicated GISD staff discussed program placement prior to their child being referred for special education evaluation. Parents of students enrolled in pre-kindergarten (87 percent) and elementary (grades K-5) (79 percent) responded “yes” more frequently than other grade levels. This is a concerning statistic as placement decisions must be made within the context of an ARD meeting. <sup>34</sup> Presuming eligibility or predetermining a more restrictive placement for a student is prohibited by the federal special education statute. It is essential that all GISD staff reserve conversations regarding a student’s placement along the continuum of services to within the ARD meeting.

**Exhibit 22. Parent Survey: School staff discussed with me program placement prior to my child being referred for special education.**



## Dyslexia

In the past few years, GISD has built out extensive protocols and supports to assist students suspected of having dyslexia. Focus group participants shared that they believe there are clear guidelines for students to be screened and processes for providing services to them either through a 504 plan or an IEP.

Focus group participants shared that next year campuses will start using the Dynamic Indicator of Basic Literacy Skills (DIBELS-8<sup>th</sup>) as a screening tool for dyslexia. In the past, the oral reading fluency component of the MAP test has been implemented as a screening tool. Dyslexia evaluations are offered in English and

<sup>34</sup> Parent’s Guide to the Admission, Review, and Dismissal Process July 2020

Spanish, though there is a recognition among focus group participants that testing in other languages should be offered.

### ***English Language Learners (ELLs) and Recently Arrived Immigrant English Learners (RAIELs)***

Focus group participants shared that the district's large ELL and recently arrived immigrant learner (RAIEL) population requires specialized attention to ensure these students are not overidentified for special education. The district has an identification worksheet with criteria that the Diagnostician completes. This process was put in place so that trained individuals could help campus teams with understanding the differences between a language acquisition delay versus delays representative of a disability. Many focus group participants noted that there is still substantial training that needs to be conducted at the campus level with implementing and monitoring interventions prior to submitting a special education referral for students who meet criteria as being an ELL or RAIEL. One participant shared an example of a RAIEL student who was supported with interventions through MTSS before the school requested a special education evaluation. The student had not been referred for ELL services and, in the end, was not found eligible for special education and related services. The team then struggled to determine how best to serve the student in the absence of special education support.

### ***504 Eligibility***

Focus group participants shared that the district has a sound process for evaluating students to determine their eligibility under Section 504. Plans are considered for students with dyslexia and those with health conditions.

### ***Identification Trends***

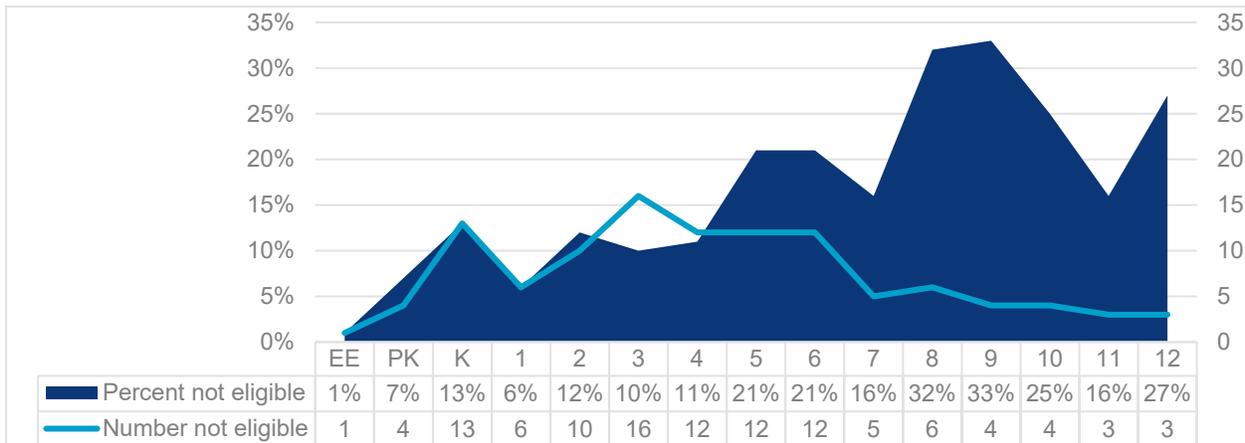
#### **Initial Identification and Exit Rates**

In the 2019-20 school year, GISD had 774 initial referrals for an initial special education evaluation, and all the evaluations were completed. Of the completed evaluations, 86% of the students were eligible for special education and related services.

#### **Initial Special Education Evaluations by Grade**

The exhibit below shows percentages and numbers of students with completed initial evaluations by grade who were not eligible for special education. The percentage of not eligible findings was lowest at the early education level (1%, with one not eligible). The highest percentages occurred at grade 8 (32%, with six not eligible) and grade 9 (33%, four not eligible). High percentages also occurred at grade 10 (25%, four not eligible), grade 12 (27%, three not eligible), and grades 5 and 6 (each 21% and 12 not eligible).

**Exhibit 23. Percentages of Completed Initial Evaluations with Disability Finding by Grade**

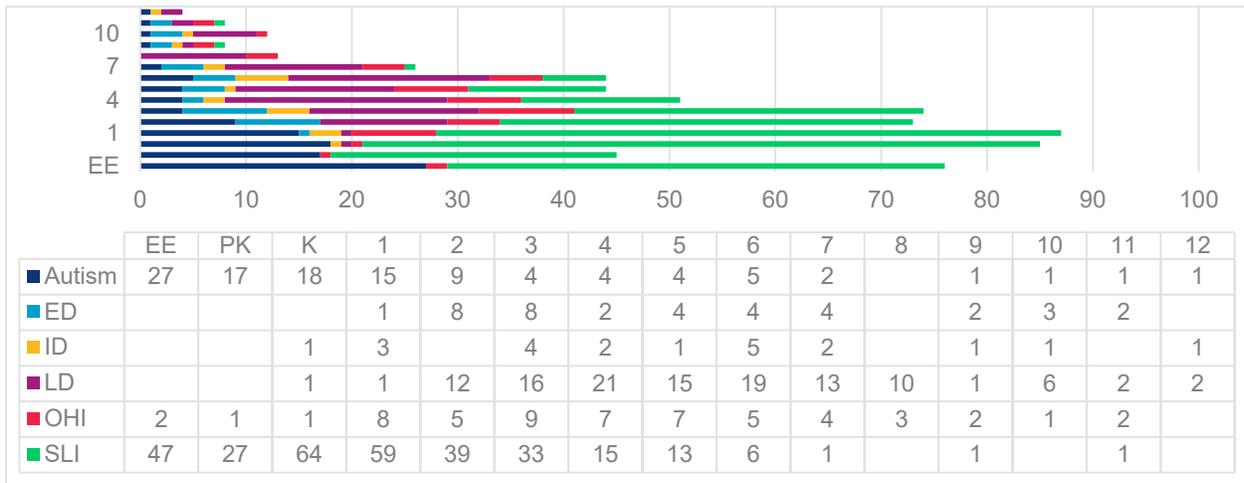


### Initial Evaluation Results by Disability Category

The exhibit below shows the number of completed initial evaluations resulting in identification for special education by disability category and grade.

- **Speech/language impairment (SLI)** was the predominant area of identification from early education through grade 3 (47, 27, 4, 59, 39, and 33, respectively).
- **Autism** was the second-highest area of identification for early education (27), the number decreased in prekindergarten through grade 1 (17 to 15), further decreased from grade 2 through 6 (9 to 5), and then decreased even more from grade 7 to 12 (2 to 1).
- **Emotional disturbance (ED)** had the area’s largest identification numbers at grades 2 and 3 (8 each), and the numbers varied from 0 to 4 thereafter.
- **Intellectual disability (ID)**. No students were identified in this area prior to kindergarten, and in kindergarten, through grade 2, only four students were identified. Numbers were highest at grades 3 and 6 (4 and 5, respectively), and in other grades ranged between 0 and 2.
- **Learning disabilities (LD)**. One student was identified in kindergarten and in grade 1. Numbers began to grow at grade 2 (12 students) and were highest from grades 2 through 8 (ranging from 12 to 10), peaking at grade 4 (21 students) and grade 6 (19 students). Four total students were identified while in high school.
- **Other health impairment (OHI)**. Small numbers of students were identified in early education through kindergarten (3 total), and numbers began to grow from grade 1 through grade 6 (ranging from 5 to 9 students). Numbers were small again in grades 8 through 11 (ranging from 0 to 3).
- **Speech/language impairment (SPI)**. The number of identified students grew from grade 1 (47) to kindergarten (64) and grade 1 (59). Numbers were smaller in grades 2 and 3 (39 and 33), smaller still from grades 4 to 6 (15 to 6), and even smaller in grades 7 to 12 (3 total).

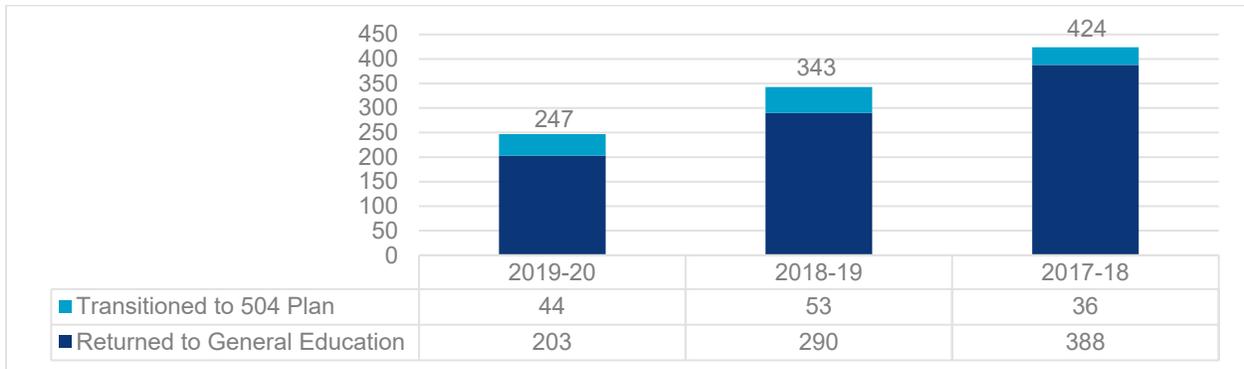
**Exhibit 24. Percentages of Completed Evaluations by Identified Disability**



**Students Exiting Special Education**

The exhibit below shows the number of GISD students who exited special education to receive services under a Section 504 plan or to return to general education with no Section 504 services. The total number of exiting students consistently decreased from 2017-18 (424) to 2018-19 (343) and to 2019-20 (247). While fewer students transitioned to general education during these years (388 to 203), the number of students who transitioned to a Section 504 plan increased from 36 to 44.

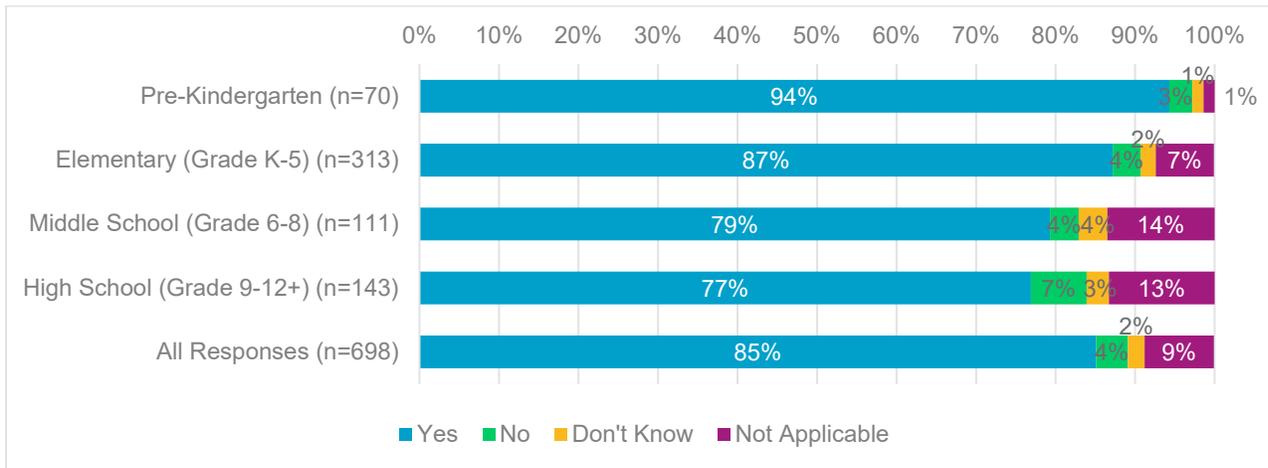
**Exhibit 25. Number of Students Exiting Special Education to Section 504 Services or to General Education (2017-18 to 2019-20)**



**Parent Survey**

When parents were asked if GISD staff clearly explained to them why their child needed special education services, 85 percent agreed. This rate was higher for parents of students in pre-kindergarten (94 percent) and lower for parents of students in high school (77 percent).

**Exhibit 26. Parent Survey: Did GISD staff clearly explain to you why your child needed special education services?**



**Continuum of Services**

The Individuals with Disabilities Education Act (IDEA)(2004) requires students with Individual Education Programs (IEPS) to receive a Free and Appropriate Public Education (FAPE) in their Least Restrictive Environment (LRE). Students with disabilities must be included in the core curriculum and receive targeted, evidence-based interventions that are implemented with fidelity to meet their needs as outlined in an IEP.

Each district must offer a continuum of services ranging from general education classes with special education support to arrangements for alternative educational placements. IEP placement decisions are to be based on each student’s individualized needs rather than service availability or preset arrangements with no flexibility. According to a recent paper on this matter by the IRIS Center at Vanderbilt University:

Placement options are fluid. A student might receive some services in one setting and other services in a different setting. Further, placements can change over time based on factors such as changes in a student’s progress or needs. For some students, the general education classroom is not necessarily the least restrictive setting.<sup>35</sup>

This section of the report is devoted to results. Specifically, how GISD is supporting teaching and learning for students with IEPs, and how the district provides specialized instruction, related services, and supplementary aids/services that enable students with disabilities to receive the educational benefits to which they are entitled.

**Educational Environment for Learning: School Aged Students**

The data in this section reflects educational setting rates of all GISD school-aged students identified for special education. Figures are also shown by disability area and by race/ethnicity.<sup>36</sup> In addition, GISD data

<sup>35</sup> IRIS Center Information Brief: Least Restrictive Environment [https://iris.peabody.vanderbilt.edu/wp-content/uploads/pdf\\_info\\_briefs/IRIS\\_Least\\_Restrictive\\_Environment\\_InfoBrief\\_092519.pdf](https://iris.peabody.vanderbilt.edu/wp-content/uploads/pdf_info_briefs/IRIS_Least_Restrictive_Environment_InfoBrief_092519.pdf)

<sup>36</sup> TEA’s State Performance Plan follows this federal guidance on how to report students by education environment: Percent of children with IEPs aged 6 through 21 served: A. Inside the regular class 80% or more of the day; B. Inside the regular class less than 40% of the day; and C. In separate schools, residential facilities, or homebound/hospital placements. (20 U.S.C. 1416(a)(3)(A)) <https://osep.grads360.org/#communities/pdc/documents/14795>

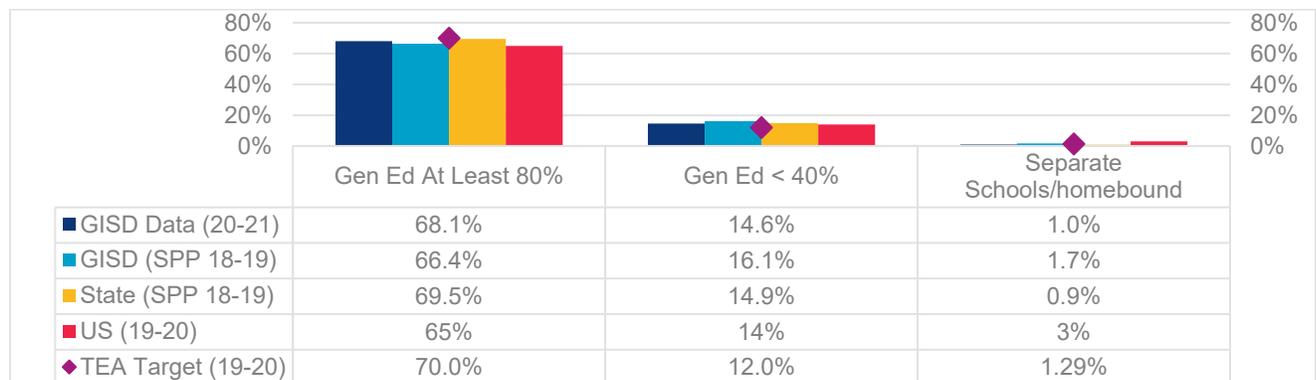
are compared to state and national data, and SPP targets for the three educational setting categories monitored by OSEP and TEA for students ages 6-21.<sup>37</sup>

### Educational Settings for GISD, Texas, and SPP Targets

Based on GISD data, the following exhibit shows all identified students placement rates in one of the three educational settings monitored by OSEP and TEA. SPP rates for GISD and the state and SPP targets are also shown.

- General Education Setting more than 80% of the Time.** Of all GISD identified students, 68.1% were educated in this setting, which was higher than the SPP’s 66.4% rate for GISD. Both rates were slightly lower than the state’s 69.5% figure. All figures were below the nation’s 65% rate and the 70.0% SPP target for 2019-20, which likely increased for 2021-22.
- General Education Setting less than 40% of the Time.** Of all GISD identified students, 14.6% were educated in this setting. This figure was lower than GISD’s 16.1% SPP rate and lower than the 14.9% state rate. All figures were higher than the SPP’s 12.0% target and the 14% national rate.
- Separate Setting.** Of all GISD identified students, 1.0% were educated in this setting. This figure was lower than the state’s 1.29% target, the 1.7% SPP rate, and the 3% national rate. All figures were higher than the state rate of 0.9%.

Exhibit 27. Percentage of Students (Age 6-21) by Educational Setting for GISD & State, and SPP Targets



### Educational Settings by Grade

The exhibit below provides for all identified students in each grade the number of students in each of the four educational settings that Texas and OSEP collect, ranging from most inclusive (general education at least 80% of the time) to most restrictive (general education less than 40% of the time, and separate setting).<sup>38</sup>

- General Education At Least 80% of the Time.** A higher proportion of students were educated in this inclusive setting from kindergarten through grade 5. The proportion fell in grades 6 through 12. Grade 12+ (students 19 -22 years of age), which likely included students who remained in high school for transition services, had the smallest proportion of students educated inclusively.
- General Education 40% to 79% of the Time.** Kindergarten and grade 1 had the smallest proportion of students educated in this environment. The proportion increased somewhat in grades

<sup>37</sup> GISD data is based on the October 2020 snapshot. The last published SPP data for GISD and the state is based on the 2018-19 school year. The latest state target is based on the 2019-20 school year. Although not yet available through TEA’s SPP-Annual Performance Report, it is likely that the state target for 2020-21 increased somewhat. Finally, national data is based on the 2019-20 school year @ <https://www2.ed.gov/programs/osepidea/618-data/static-tables/index.html#partb-cc>.

<sup>38</sup> Neither Texas nor ED monitors the educational setting of general education between 40% to 79% of the time.

2 through 5, and to a greater extent in grades 6 through 8. The group was smaller in grades 9 through 12, and smallest in grade 12+.

- **General Education Less Than 40% of the Time.** Grade 12+ had the largest proportion of students in this setting. Kindergarten, grade 1 and grade 12 had the next largest proportion of students. The proportions gradually decreased from grades 2 to 10, and then increased again in grade 11.
- **Separate Setting.** The proportions of students were small in each grade, but they were smallest in kindergarten and grade 12 and largest in grades 10 through 12.

**Exhibit 28. Number of Students by Educational Environment and Grade**



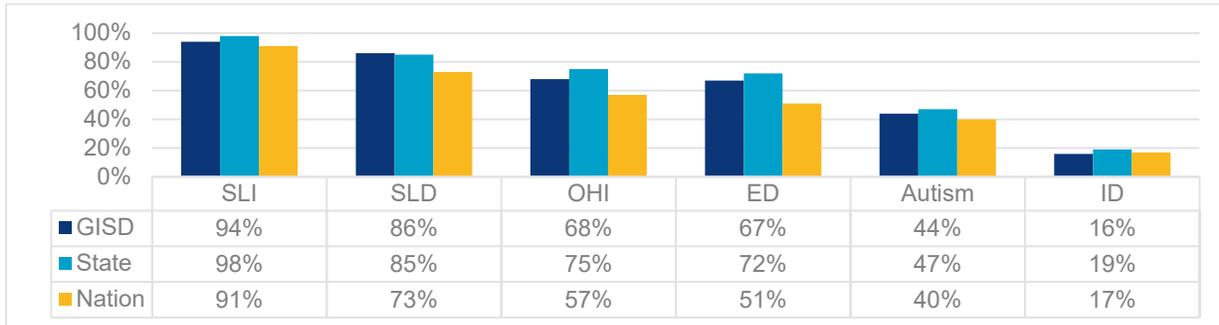
### Educational Setting by Primary Disability Area

This section presents information about the three educational environments and six primary disability categories that Texas and ED monitor. For each educational environment and disability category, GISD data are compared to state and national data.<sup>39</sup>

- **General Education Setting 80% Or More of the Time**
- The exhibit below shows GISD, state, and national rates for this educational setting by disability category.
- **Speech/Language Impairment (SLI).** GISD's rate (94%) is smaller than the state's (98%), and they are both larger than the national rate (91%).
- **Specific Learning Disability (SLD).** GISD's rate (86%) is about the same as the state's (85%), and they are both larger than the national rate (73%).
- **Other Health Impairment (OHI).** GISD's rate (68%) is smaller than the state's (75%), and they are both larger than the national rate (57%).
- **Emotional Disturbance (ED).** GISD's rate (67%) is smaller than the state's (72%), and they are both larger than the national rate (51%).
- **Autism.** GISD's rate (44%) is smaller than the state's (47%), and they are both larger than the national rate (40%).
- **Intellectual Disability (ID).** GISD's rate (16%) is smaller than the state (19%) and national (17%) rates.

<sup>39</sup> GISD data is based on the October 2020 snapshot. State and national data is based on ED data for the 2019-20 school year @ <https://www2.ed.gov/programs/osepidea/618-data/static-tables/index.html#partb-cc>.

**Exhibit 29. Percentage of Students Placed in General Education 80% Or More of the Time by GISD, State & Nation**

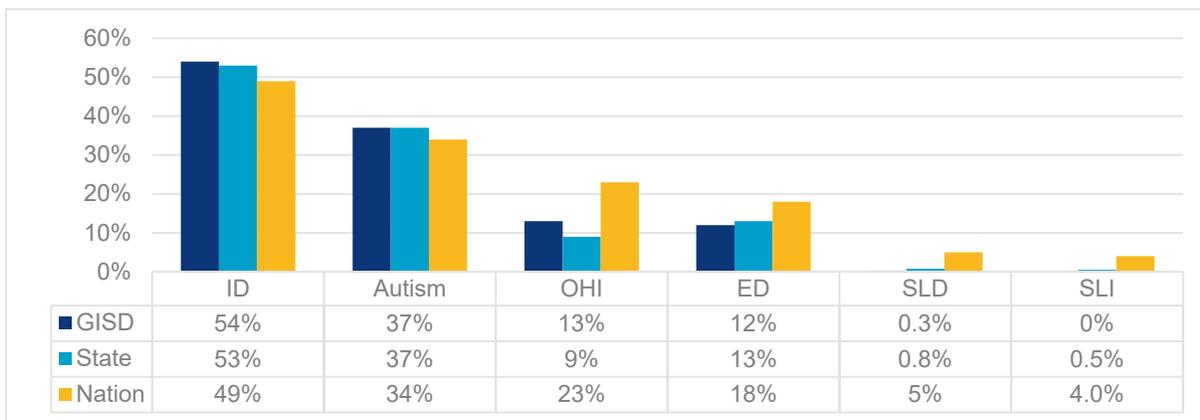


**General Education Setting Less than 40% of the Time**

Except for other health impairments, GISD rates are about the same or smaller than state rates and larger than national rates.

- **Intellectual Disability.** GISD's rate (54%) is about the same as the state's (53%) and larger than the nation's (49%).
- **Autism.** GISD's rate (37%) is the same as the state's and larger than the nation's (34%).
- **Other Health Impairment.** GISD's rate (13%) is larger than the state's (9%) and smaller than the nation's (23%).
- **Emotional Disturbance.** GISD's rate (12%) is about the same as the state's (13%) and larger than the nation's (18%).
- **Specific Learning Disability.** GISD's rate (0.3%) is about the same as the state's (0.8%) and larger than the nation's (5%).
- **Speech/Language Impairment.** GISD's rate (0%) is about the same as the state's (0.5%) and larger than the nation's (4%).

**Exhibit 30. Percentage of Students Placed in General Education 80% or More by GISD, State & Nation**



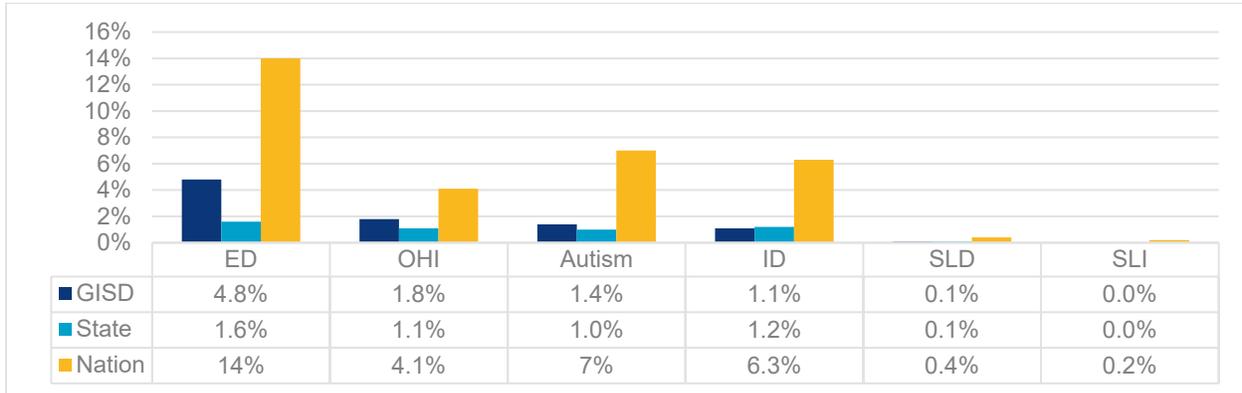
**Separate Settings**

Except for OHI, GISD rates are about the same or smaller than state and larger than national rates.

- **Emotional Disturbance.** GISD's rate (4.8%) is larger than the state's (1.6%) and much smaller than the nation's (14%).
- **Other Health Impairment.** GISD's rate (1.8%) is larger than the state's (1.1%) and smaller than the nation's (4.1%).
- **Autism.** GISD's rate (1.4%) is larger than the state's (1.0%) and smaller than the nation's (7%).

- **Intellectual Disability.** GISD's rate (1.1%) is about the same as the state's (1.2%) and smaller than the nation's (6.3%).
- **Specific Learning Disability and Speech/Language Impairment.** Both categories have GISD and state rates that are close to zero, and both are lower than the nation's rate (0.4%).

**Exhibit 31. Percentage of Students Placed in Separate Settings by GISD, State & Nation**



The table below compares GISD educational environment rates to the state and nation for each of the six disability categories and three educational environments. The green highlight shows areas that GISD rates are comparable to or represent more inclusivity than the state or nation. The red highlight shows areas that GISD rates reflect less inclusivity than the state or nation.

**Table 4. Percentage of GISD Students with Disabilities by Race and Educational Setting, 2019**

|  | GISD to State Rates                           | GISD to Nation Rates |
|--|---|----------------------|
| <b>General Education At Least 80% of Time</b>  | Larger rate reflects <b>MORE</b> inclusivity  |                      |
|  | Smaller rate reflects <b>LESS</b> inclusivity |                      |
| Autism   | Smaller rate                                  | Larger rate          |
| Emotional Disturbance                          | Smaller rate                                  | Larger rate          |
| Intellectual Disability                        | Smaller rate                                  | Smaller rate         |
| Other Health Impairment                        | Smaller rate                                  | Larger rate          |
| Speech/Language Impairment                     | Smaller rate                                  | Larger rate          |
| Specific Learning Disability                   | Comparable rate                               | Larger rate          |
| <b>General Education Less Than 40% of Time</b> | Smaller rate reflects <b>MORE</b> inclusivity |                      |
|  | Larger rate reflects <b>LESS</b> inclusivity  |                      |
| Autism   | Comparable rate                               | Larger rate          |
| Emotional Disturbance                          | Comparable rate                               | Larger rate          |
| Intellectual Disability                        | Smaller rate                                  | Larger rate          |
| Other Health Impairment                        | Larger rate                                   | Smaller rate         |
| Speech/Language Impairment                     | Smaller rate                                  | Larger rate          |
| Specific Learning Disability                   | Smaller rate                                  | Larger rate          |
| <b>Separate Setting</b>                        | Smaller rate reflects <b>MORE</b> inclusivity |                      |
|  | Larger rate reflects <b>LESS</b> inclusivity  |                      |

|                              | GISD to State Rates | GISD to Nation Rates |
|------------------------------|---------------------|----------------------|
| Autism                       | Comparable rate     | Smaller rate         |
| Emotional Disturbance        | Larger rate         | Smaller rate         |
| Intellectual Disability      | Comparable rate     | Smaller rate         |
| Other Health Impairment      | Comparable rate     | Smaller rate         |
| Speech/Language Impairment   | Comparable rate     | Comparable rate      |
| Specific Learning Disability | Comparable rate     | Comparable rate      |

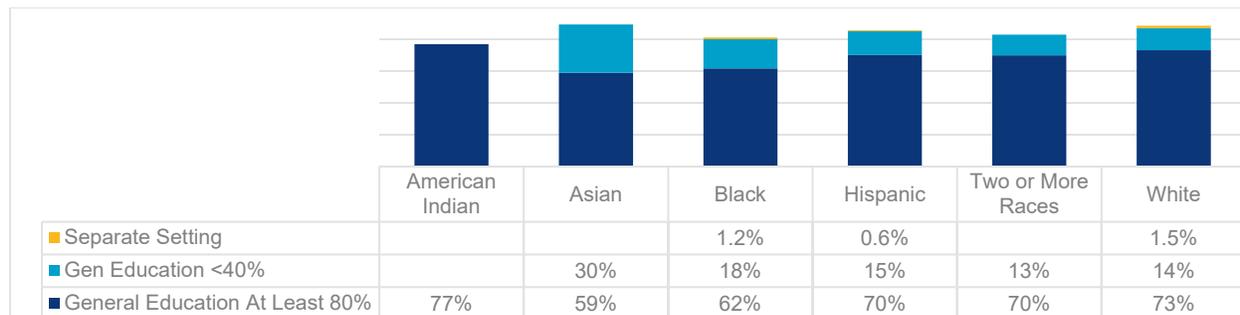
### Educational Environment Rates by Race/Ethnicity

This section provides information about the placement of students in the three educational environments TEA and OSEP monitor through the SPP and for significant disproportionality by race/ethnicity. Only racial/ethnic groups with at least ten students have data displayed.

The exhibit below shows educational environment rates for each racial/ethnic group.

- **General Education At Least 80% of the Time.** American Indian students had the largest rate (77%) of students educated inclusively (general education at least 80% of the time.) Asian and Black students had the lowest rates (59% and 62%, respectively).
- **General Education Less Than 40% of the Time.** Asian students had the highest rate (30%) for this setting. The remaining student groups had rates ranging between 18% (Black students) and 13% (two or more races).
- **Separate Setting.** With a rate of 1.5%, White students had the largest rate of students, which was closely followed by Black students (1.2%). The rate for Hispanic students (0.6%) was the smallest.

Exhibit 32. Percentages in by Educational Environments & Race/Ethnicity<sup>40</sup>



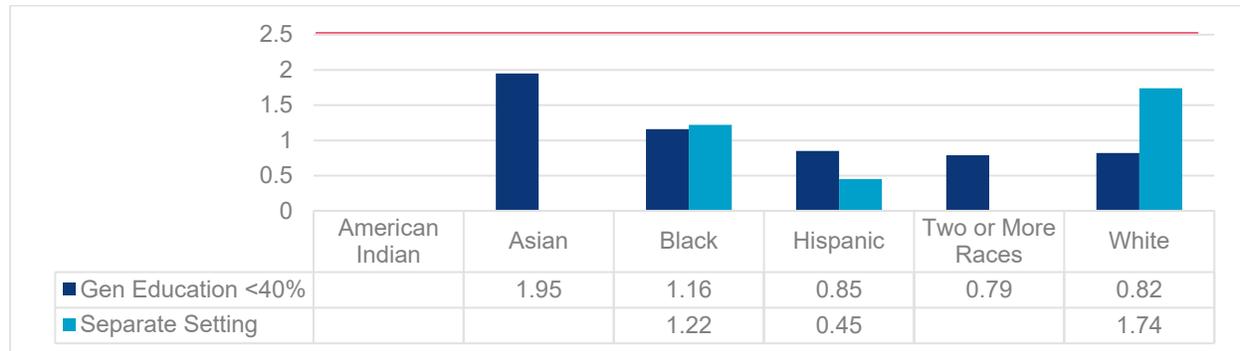
### Risk Ratios for Two Most Restrictive Environments by Race/Ethnicity and Disability

TEA monitors school districts for significant disproportionality related to the placement of students in the two most restrictive settings: general education less than 40% of the time and separate schools. The state uses a maximum 2.5 risk ratio threshold for this measurement. As shown in the exhibit below, no GISD racial/ethnic student group was more likely than others to learn in a restrictive placement. With a 1.95 risk ratio, Asian students had the highest likelihood of all racial/ethnic groups to learn in special classes (general education classes less than 40% of the time). For students learning in separate schools, white students

<sup>40</sup> The education environment of general education between 79% and 40% of the time is not included in the Exhibit totals, which do not equal 100%.

(1.74 risk ratio) were most likely, and Hispanic students (0.45 risk ratio) were least likely to be placed in this setting compared to respective non-white and non-Hispanic students.

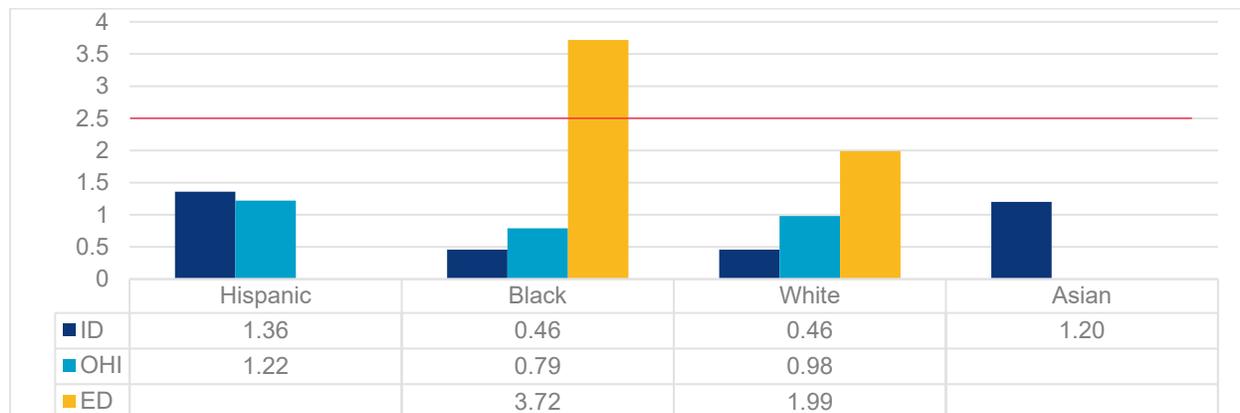
**Exhibit 33. Risk Ratios by Race/Ethnicity and General Education Less than 40% of Time and Separate Schools**



**Risk Ratios for Two Most Restrictive Environments by Disability Area & Race/Ethnicity**

TEA does not monitor risk ratios for significant disproportionality by disability category and race/ethnicity. Data sorted in this manner, however, provides additional information about racial/ethnic disparities. As shown in the exhibit below, Black students identified with an emotional disturbance were 3.72 times more likely than non-Black students to learn in specialized classes, i.e., general education less than 40% of the time environment. With a risk ratio of 1.99, white students with ED had the next highest likelihood. No other group had a risk ratio that exceeded 1.22.

**Exhibit 34. Risk Ratios for Most Restrictive Educational Settings by Disability Category and Race/Ethnicity**



**Inclusive Practices**

Inclusive practices allow for students with disabilities to be educated alongside their typically developing peers in the general education setting with the necessary supports.<sup>41</sup> Students with disabilities demonstrated an increase in engagement and learning more aligned with grade levels standards when participating in inclusive education.<sup>42</sup> Research supports that all students, including those without

<sup>41</sup> Downing, J. E., & Peckham-Hardin, K. D. (2007). Inclusive education: What makes it a good education for students with moderate to severe disabilities. *Research and Practice for Persons with Severe Disabilities*, 32, 16-30. doi:10.2511/rpsd.32.1.16

<sup>42</sup> Kurth, J. A., & Mastergeorge, A. M. (2012). Impact of setting and instructional context for adolescents with autism. *The Journal of Special Education*, 46, 36-48. doi:10.1177/0022466910366480

disabilities, benefit from having access to high-quality instruction based upon grade-level standards.<sup>43</sup> Federal regulations have evolved to reflect that inclusion is no longer a placement but rather a practice.

According to data gathered from focus groups, the GISD special education leadership and staff have adopted inclusive practices, such as collaborative scheduling and planning. School-by-school, however, there are inconsistencies with how inclusive education is implemented. In addition, there are mindset shifts at all levels of the organization that need to occur to fully align with inclusive practices.

During the focus groups with staff and administration, the following was shared:

- “In Garland, we seem to be stuck 20 years ago (when discussing inclusive practices).”
- “We have a long way to go before we see inclusion in terms of the structure and need to include everyone in ‘inclusion.’ It is not very pervasive throughout the district.”
- “One of our goals is strategic scheduling with our most needy populations. Students in resource are being served, yet we don’t have a true understanding of the Stetson model so those students in inclusion are not getting the required minutes from the IEP.”
- “It’s a lot less expensive to use special education aides in the classroom to give students the required minutes. We are using a teacher going into the classroom to get other minutes.”
- “We have special educators come in to co-teach and support all students, rather than making it as though they are only there to support students with special needs.”
- “Students in the inclusion model are not being supported the way they need to be.”
- “The framework (for inclusive practices) is very loose. For example, secondary level facilitators are administrators who are responsible for ARDs, and there is a disconnect from the other administrators. Special education survives on its own.”

When asked what one would observe when walking into a school building that houses a special education program, an interviewee provided the following response based upon their experience during a school tour:

“In one school, we had a student that was almost kept in the class with no supports. They did not receive any additional supports. The principal did not want to pull him out because all the students liked him like a ‘pet.’ I did a walkthrough in a school and noticed a student who was just rocking back and forth. They (education team members) needed to start a plan for her, but still had not started that. Everything on the spectrum that you might see if you walk into a classroom. Some students are ‘wasting away’ because they have nothing to support their learning.”

GISD district leadership alike can agree that the aforementioned scenario is never acceptable. There must be a shift in professional obligation to not only engage in inclusive practices but to prioritize the humane treatment of students.

## Parent Survey

Parents serve as mandatory members of the ARD team.<sup>44</sup> As such, parent input was gathered to provide perspective on GISD’s inclusive practices. The exhibit below details GISD parent survey data responding to perceived value as a member of the school community.

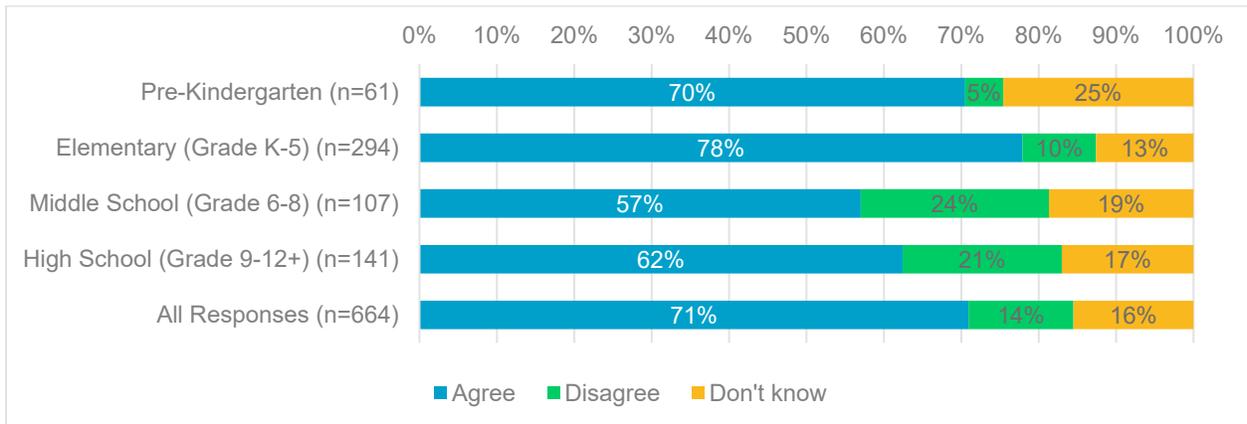
Of the parents who responded to the survey, 71 percent agreed that their child is a valued member of the school and is generally included in all academic and extracurricular activities. The percentage of parents who agreed was highest among parents of students in elementary (78 percent) and lowest for parents of students in middle school (57 percent). Similarly, 21 percent of parents of students in high school disagreed.

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<sup>43</sup> Courtade, G., Spooner, F., Browder, D., & Jimenez, B. (2012). Seven reasons to promote standards-based instruction for students with severe disabilities: A reply to Ayres, Lowrey, Douglas, & Sievers (2011). *Education and Training in Autism and Developmental Disabilities*, 47, 3-13.

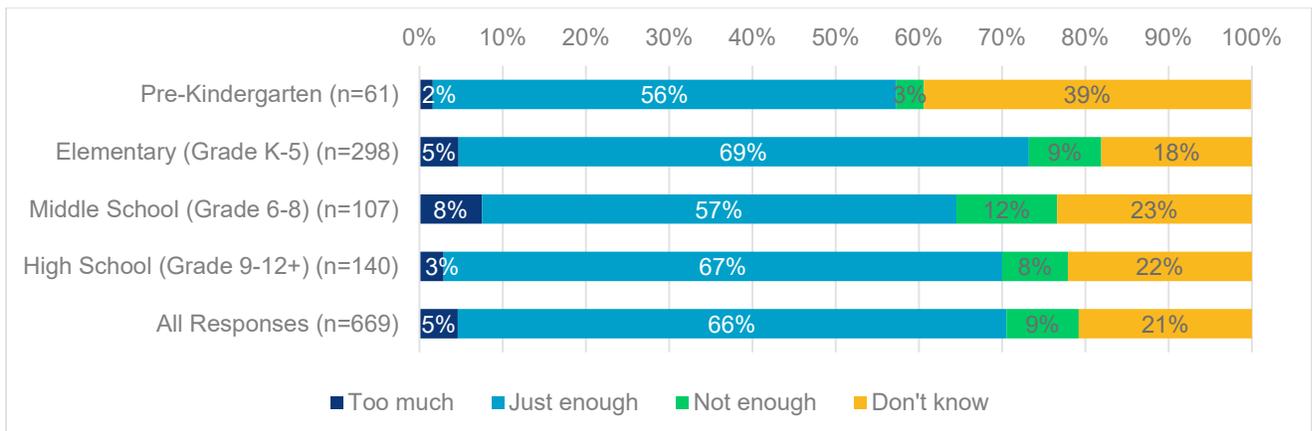
<sup>44</sup> Parent’s Guide to the ARD Process, July 2020.

**Exhibit 35. Parent Survey: My child is a valued member of the school and is generally included in all academic and extracurricular activities.**



Most parents (66%) believed the amount of time their child spends in the general education setting is “just enough” compared to 5 percent who believed it was “too much”, and 9 percent who believed “it wasn’t enough.” The percentage of parents who believed their child did “not spend enough” time in general education was highest for parents of students in middle school. Overall, 21 percent of parents “did not know.”

**Exhibit 36. Parent Survey: The amount of time my child spends in the general education classroom is**



### ***Collaborative Teaching and Co-Teaching***

The use of a co-teaching model that involves a general education teacher and a special education teacher providing inclusive education opportunities for students with disabilities continues to gain popularity across the U.S. Co-taught classrooms offer one way in which the expectations of inclusive education can be met for students with and without disabilities.<sup>45</sup> Several models of co-teaching that are most often implemented within classrooms are reflected within professional literature.<sup>46</sup> These approaches vary in their collaborative nature, ranging from methods in which one teacher plays a more primary role in planning and instruction than the other, to more collaborative, team-based approaches in which there is shared responsibility for planning and instruction. Friend and Cook (2012) describe six approaches to co-

<sup>45</sup> Friend, M., L. Cook, D. Hurley-Chamberlain, and C. Shamberger. 2010. “Co-teaching: An illustration of the complexity of collaboration in special education.” *Journal of Educational and Psychological Consultation* 20: 9-27.

<sup>46</sup>Friend, M., L. Cook, D. Hurley-Chamberlain, and C. Shamberger. 2010. “Co-teaching: An illustration of the complexity of collaboration in special education.” *Journal of Educational and Psychological Consultation* 20: 9-27.

teaching that represent the essence of what occurs in co-taught classes. These approaches include one teach-one assist, one teach-one observe, station teaching, parallel teaching, alternative teaching, and team teaching. These models of co-teaching are hierarchical and represent the least to most collaborative approaches.<sup>47</sup>

Relevant literature widely accepts there is a need to move toward more collaborative approaches to co-teaching and a perception that these models are important in reaching a diverse student population.<sup>48</sup> These co-teaching methods may be best understood by teachers in terms of the roles and responsibilities of each educator suggested by this hierarchy of approaches.<sup>49</sup> However, teams may use multiple approaches to co-teaching in their everyday practice, and variations in their approach to co-teaching may depend upon many factors.<sup>50</sup>

Co-teaching practices seem to be influenced by multiple factors across schools, teachers, teacher training, as well as across different cultures. These factors may include structural aspects of the co-teaching program, teachers' attitudes regarding co-teaching, and teachers' professional development in the use of co-teaching. Co-teaching experiences may vary across several structural factors, including the number of co-teaching pairs that an individual teacher works within any given day, the amount of time co-teachers spend together during the day, and the amount of time a co-teaching team has worked together<sup>51</sup>. As an example of structural variation in co-teaching experiences, a teacher may work as part of a single co-teaching pair throughout the full school day, or alternatively, an educator may co-teach for only one period of the school day during instruction for a single content area. Teachers may also work in numerous co-teaching teams throughout the day to instruct different groups of students or across different content areas.<sup>52</sup>

The current model of inclusion throughout GISD varies. Programmatically, GISD's inclusion teachers support students with disabilities in the general education classroom. These teachers provide a supportive model designed to assist students receiving special education services while fully accessing enrolled grade level curriculum. Support from an inclusion teacher is considered a supplementary aid and service provided by a special education teacher or paraprofessional to support students receiving special education services in the general education classroom. Within this model, the inclusion teacher may implement a variety of practices including: 1) direct instruction, 2) re-teaching, 3) modifications, 4) collaboration, or 5) assist in other ways that provide to support in collaboration with the general educator. The general education teacher remains the teacher of record under this GISD inclusion model. GISD has identified the following as expectations for the special education teacher when acting in the capacity of an inclusion teacher:<sup>53</sup>

- Go into the general education class to provide support to the students;
- Plan the schedule to meet the needs of the students; and
- Provide modifications as needed.

In addition to the work of inclusion teachers, GISD offers a Content Mastery program (CM) for secondary students only. Content Mastery is designed to support special education students in the general education classroom accessing the general curriculum. Within the CM program, students receive direct instruction in

<sup>47</sup> Friend, M., L. Cook, D. Hurley-Chamberlain, and C. Shamberger. 2010. "Co-teaching: An illustration of the complexity of collaboration in special education." *Journal of Educational and Psychological Consultation* 20: 9-27.

<sup>48</sup> Villa, R. A., J. S. Thousand, and A. I. Nevin. 2013. *A guide to co-teaching: New lessons and strategies to facilitate student learning.* (3rd ed.) Thousand Oaks, CA: Corwin Press, Inc

<sup>49</sup> Friend, M., L. Cook, D. Hurley-Chamberlain, and C. Shamberger. 2010. "Co-teaching: An illustration of the complexity of collaboration in special education." *Journal of Educational and Psychological Consultation* 20: 9-27.

<sup>50</sup> Gurgur, H., H., and Y. Uzuner. 2010. "A phenomenological analysis of the views on co-teaching applications in the inclusion classroom." *Educational Sciences: Theory and Practice* 10: 311-331.

<sup>51</sup> Friend, M., L. Cook, D. Hurley-Chamberlain, and C. Shamberger. 2010. "Co-teaching: An illustration of the complexity of collaboration in special education." *Journal of Educational and Psychological Consultation* 20: 9-27.

<sup>52</sup> Friend, M., L. Cook, D. Hurley-Chamberlain, and C. Shamberger. 2010. "Co-teaching: An illustration of the complexity of collaboration in special education." *Journal of Educational and Psychological Consultation* 20: 9-27.

<sup>53</sup> GISD Special Education District Guidance documents

the general education setting and may attend the CM center during independent practice portions of a lesson for additional support.<sup>54</sup>

Students with more significant learning differences in elementary and secondary general education classrooms can receive instructional support through the resource model. As described by GISD staff, “the traditional resource classroom is for special education students who are struggling substantially more than struggling grade-level peers and are functioning significantly below grade level.” Special educators provide direct, modified grade-level instruction for the core academic areas as well as plan for instruction according to a student’s IEP. Key components of the resource model in GISD include:<sup>55</sup>

- Scheduling-provided at the same time general education grade peers are receiving interventions (elementary) and instruction (secondary).
- May be for a portion of the intervention time instruction is provided to grade-level peers or for the full amount of time. (Elementary has a 50–60-minute block of time allocated for intervention that may be divided up as 30 minutes for reading and/or math resource instruction.)
- Both the special and general education teachers will be responsible for grades (elementary).

Lastly, students requiring specialized instruction can have their needs met through instructional and curricular accommodations/modifications recommended by the ARD committee within the general education classroom.<sup>56</sup>

Focus group participants acknowledged that GISD existing inclusion models are challenging to sustain. Specifically, a lack of appropriate staffing for inclusion teachers has campuses relying on paraprofessionals to provide specially designed instruction:

- “Special education teacher’s days are booked, so paraprofessionals provide services for inclusion students.”
- “One issue for our campus is that special education paraprofessionals are in self-contained classrooms only. The schedule is tough.”
- “We are a small campus but have high special education numbers. Paraprofessional goes in and does inclusion. We only have 2 paraprofessionals right now and they can’t do it all.”
- “Teachers should be writing paraprofessionals into lesson plans, pulling groups, working with children with special needs, etc. My para will get the minutes done.”
- “Refer to (staffing) matrix but have never seen it. They take away teachers because of your counts, but they never give you back a teacher if you get 13 new kids.”
- “There is a lack of continuum. We only have inclusion, but we need pull-out, autism program, etc.”
- “Special education varies vastly from school to school. There is no set way that it is run.”

Becoming reliant on a workforce of paraprofessionals with potentially minimal training in special education best practices is ineffective. This current model appears to be more focused on meeting a compliance metric rather than focusing on the quality of instruction being delivered. It is important to note that according to TEA guidance, paraprofessionals may provide specially designed instruction to students receiving special education services when a certified special education teacher designs the specially designed instruction, and the paraprofessional is under the supervision of the certified special education teacher.<sup>57</sup>

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<sup>54</sup> GISD Special Education District Guidance documents

<sup>55</sup> GISD Special Education District Guidance documents

<sup>56</sup> GISD Special Education District Guidance documents

<sup>57</sup> “Specially Designed Instruction: A Resource for Teachers” Developed by TEA.  
<https://projects.esc20.net/upload/page/0103/docs/SDI%202018.pdf>

Some staff within GISD received training on inclusive best practices by the team at Stetson and Associates. This multi-day series focused on the intention and function of inclusive models of education. However, there continue to be barriers to implementation within GISD:

- “There is intention to implement practices from Stetson training- to provide consistent inclusive services within classrooms. However, it is mostly pull-out, services and paraprofessionals often tasked with providing specialized instruction. They are staffed in the self-contained classrooms primarily.”
- “No follow up on adoption for Stetson (training).”
- “They are starting to get some of the things right with ‘inclusion’. With Stetson training, they’ve made progress around building the mindset – their challenge now is around scheduling and creating master schedules that support it. The other challenge is how they support their teachers.”
- “Modified Stetson on our campus—4th and 5th math, resource teacher goes into each classroom. With 4<sup>th</sup>, they are trained and making good progress. Fifth grade received no training and is not much progress.”
- “My campus received no Stetson training...Nor has mine, but they’re not in a hurry.”
- “Stetson came in last 3 years to hone inclusive practices. Before that, we piloted a few campuses with inclusive practices. After Stetson did a 2-day training, we came out and to do TA visit, then coaches would go to meetings. We provide additional support with scheduling. Whatever campus needed, accommodations, modifications, clarifications, we go out to do that.”

There appears to be a disconnect between the inclusive model trainings and inclusive practices at each campus. In addition, GISD has adopted collaborative and co-teaching models through the role of inclusion teachers on some campuses. Below is a synopsis of feedback from focus group participants who serve in the role of inclusion teachers within GISD:

- “Special education staff has duty in the morning. If anyone in our department is out, we shuffle to fill in gaps for each other, resources, ALE etc. We have students in inclusion which could be in 1-4 rooms during any class period. We spend our time doing that and can only stay in one room for 15 minutes then switch. It’s enough time to tell student put their name on a paper, and one conference period every other day.”
- “I am an inclusion teacher, and co-teacher. On ‘A’ days, I coteach English 2nd period, on ‘B’ days co-teach 5th and 6th math. I have a conference period on ‘A’ days and the rest of the time in support facilitation- helping them with homework, etc. This is designed only for special education students. Teachers send kids to us, not a class period. It’s like inclusion- we go around and help students. They come to us so we have to be available and ready... Sometimes it’s hard to meet the needs when we have students with behavior issues. Because of inclusion time, etc. it’s hard to meet the times.”
- “I do inclusion science. I have a conference period at same time as other science teachers, but I need that time. We collaborate via email or in hallways. The special education department does not have a mutual conference period. We can’t meet together unless we do it on our time (not contract time).”
- “In the classroom, I am giving students support, making sure students are receiving their accommodation, modification, assisting teachers, making sure virtual students have access to materials. Sometimes I’m doing alternative assignments or redoing them. On the department side, I am assisting others with implementation, covering someone’s inclusion if they have an ARD, running PLCs and meetings, preparing for PLCs, participating in ARDS. Weekly, I am checking grades and adding tutorials when needed.”

### ***Separate Classes and District-wide Programs***

GISD provides several special education programs unique to students with more significant or complex disabilities. These programs are available throughout the school district. Students with disabilities are

placed into separate classes or special education programs based upon the ARD committee determination. Below is a breakdown of each special education program or separate class offered in GISD:

- Applied Learning Environment (ALE):<sup>58</sup> The ALE program is designed for students whose needs cannot be met by the general education curriculum and implements a functional and developmental curriculum. The curriculum provides instruction in the following domains: Functional Academics, Domestic, Community, Recreation/Leisure and Vocational. Maximum development of skills required for daily living and occupational activities is the anticipated outcome for each student in the ALE program.
  - Moving Toward Independence (MTI):<sup>59</sup> MTI is part of the ALE program. It serves as a specialized class designed to support students who require additional assistance in the areas of self-help and daily living skills.
  - Behavioral ALE:<sup>60</sup> Behavioral ALE is another part of the ALE program. It serves as a specialized class designed to provide additional behavioral supports beyond those typically found in the ALE classroom.
- Behavior Adjustment (BA)<sup>61</sup>: The BA program is designed to serve eligible students whose behavior consistently interferes with their educational performance. This program provides a structured learning environment, a social skills curriculum and instruction, and regular contact with parents. The goal of the program is the successful return of each student to the general classroom.
  - ABC:<sup>62</sup> The Adaptive Behavior and Communication programs are designed to meet the needs of students diagnosed with autism spectrum disorders, traumatic brain injury, or other neurological impairments whose behavior consistently interferes with their educational performance. The focus is on development of age-appropriate social skills, coping, and communication skills, and academics. The goal of the program is the successful return to the general education classroom to the greatest extent possible.
  - ABC/Kindergarten (KN)<sup>63</sup>: This class is for students with autism or other neurological disorders who are five or six years old and functioning academically at the kindergarten level. The students attend the ABC/KN class for social skills development as well as individualized instruction on specific objectives. For the remainder of the day, the students are included with the general education kindergarten class.
- PAC:<sup>64</sup> The Pathfinder Achievement Center serves special education students between the ages of 6 and 21 years whose behavior severely interferes with learning and who require a more structured environment than a general education campus can provide. The goal of the PAC is for students to successfully return to their home campus with appropriate support.<sup>65</sup> *Note: this program closed at the end of the 2020-21 school year. More information about this decision is included below.*

More restrictive placements for students along the least restrictive environment continuum are made by ARD committee members during a student's IEP team meeting. Being placed in a more restrictive setting does not guarantee that the student will remain in their home (neighborhood) school or consistently have access to general education peers. The aforementioned programs and their classrooms are spread throughout the district. GISD staff interviewed as part of this study provided the following feedback about how locations for these self-contained programs or classrooms are selected:

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<sup>58</sup> GISD Special Education Program Resources Website [Special education | Garland Independent School District \(garlandisd.net\)](https://www.garlandisd.net/special-education)  
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<sup>60</sup> GISD Special Education Program Resources Website [Special education | Garland Independent School District \(garlandisd.net\)](https://www.garlandisd.net/special-education)  
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<sup>65</sup> GISD Special Education Program Resources Website [Special education | Garland Independent School District \(garlandisd.net\)](https://www.garlandisd.net/special-education)

- “In an open campus, why did they pick us? We are a 1979 open campus, so it does not make sense. Safety is a concern.”
- “Because of school choice, it boils down to transportation. So, schools on a specific route are the ones that get the self-contained unit.”
- “Last year there was a focus group to decide how to distribute the units, but I don’t think the suggestions were taken (3 or 4 meetings to get input from our principals).”
- “Distribute the units more equitably.”
- “If we create programs when kids know where they’re going so you have alignment through programs-autism on a few campuses, then articulate to next program.”
- “Started looking at how to support students at PAC. Half of the students were already in other programs, and it was decided it would be best to spread the students over campuses.”
- “Maybe talking about the rationale for the locations. For example, we had students jumping several schools in their first five years because the programs weren’t placed well.”
- “Some of the rooms they are using to accommodate the units are not located in the best place. A small campus to have two BA units- can’t imagine having any more than that. There’s no space for additional units. (The school) has to shut down science lab to open up a BA unit this year. We are left asking “why here?”
- “You have to be fair. Look at the distribution and make sure that you don’t have so many units concentrated in one place. It’s becoming unmanageable for Asst Principals.”

The decision-making for the location of special education programs was questioned by several interviewees and focus group participants. There were questions around the equitable distribution of programs or some schools being “unfairly” subjected to having “unmanageable” numbers of programs within their buildings. Some GISD staff interviewed shared the belief that being required to educate students with more profound or complex disabilities was important but did not believe this should necessarily occur within their respective buildings:

- “Some programs take a lot more time and commitment from staff, so a high-risk load is a consideration before bringing in other programs.”
- “We have used BA base programs. We’ve moved other programs because a principal couldn’t handle it.”
- “School ‘XYZ’ has an autism unit on campus in addition to special education. Autism students are included in gen ed classrooms. It is hard to balance gifted students with neighborhood students with students with autism. The students are confused by the behaviors of the students with autism. The placement at this campus of the autism program is not working. (They) need different supports than we can give them.”
- “Principals are deciding what programs they are or are not going to run. Not as much with the self-contained classrooms and there are too many of them here.”
- “Special education department has materials that are recommended. Principals decide they aren’t going to use those.”
- “It’s a mindset. It’s a global issue for all programs.”
- “Teachers and principals need updates on the special education law. When you get new principals, we don’t want it to revert back to ‘I don’t want this in my school.’”
- “What we are seeing is that teachers don’t want the program at their school.”

Implementing inclusive practices, such as techniques from the Stetson trainings, are only moderately effective if GISD staff lack an inclusion mindset. Analysis of the narrative data from this study supports the perspective that individuals across many key levels of leadership, at the school level, within GISD are not demonstrating a mindset required to be a fully inclusive district. It is essential that the mental models of GISD staff perpetuating these beliefs are examined prior to implementing new inclusive practices training.

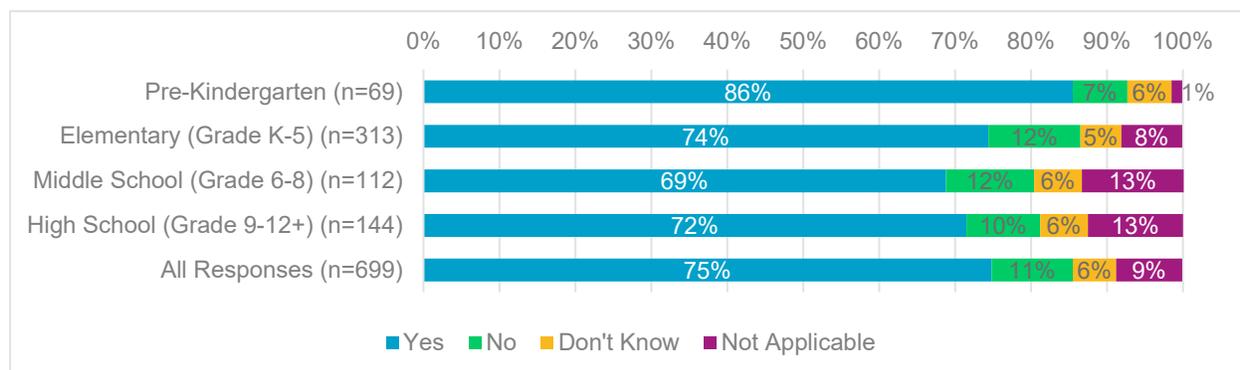
Programmatically, GISD has executed a major decision to shut down the Pathway Achievement Center (PAC) at the end of the 2020-21 school year. The decision was made because of safety concerns and the viewpoint of the current district leadership that students in this program were not receiving an equitable education. PAC functioned as a separate school within the GISD network of public schools. All students within the PAC program are returning to classrooms within elementary and secondary schools. Decision-making regarding a student’s more restrictive placement and separate special education programs’ rigor was questioned by study participants. Additionally, the decision to move forward with more inclusive programming has been met with mixed reactions from GISD staff:

- “The PAC closure proposal is to bring those folks together to look at these things. The team is now rethinking the structure for PAC closure.”
- “The plan is to close their current building; a place that was sending students to their PAC program was shut down for investigation.”
- “(They) don’t want the small enrollment remaining at PAC to be in isolation – four sites – elementary through high school.”
- “Placement in schools and opening new classrooms- big shift this year. We had 13 elementary campuses with self-contained autism classrooms. Some are k-5 in the same classroom. We decided that each campus will have three classes (going down to 8 campuses) w/ k-1, 2-3, 4-5. Teachers will have a team.”
- “We found that students are coloring, and nothing is happening. This is not daycare. We have to have high-quality, rigorous programming.”
- “Programming is also very chaotic.”
- “People like to think programming is stronger than it is. Teachers have said ‘we don’t teach behavior’ and want students off in their own self-contained unit.”
- “We instructed coordinators to go out and find the students who should not be in self-contained units. They found 6-8 students. We’ve had some misplacements. Students were sent there when they should have been in another program. These decisions are unethical.”

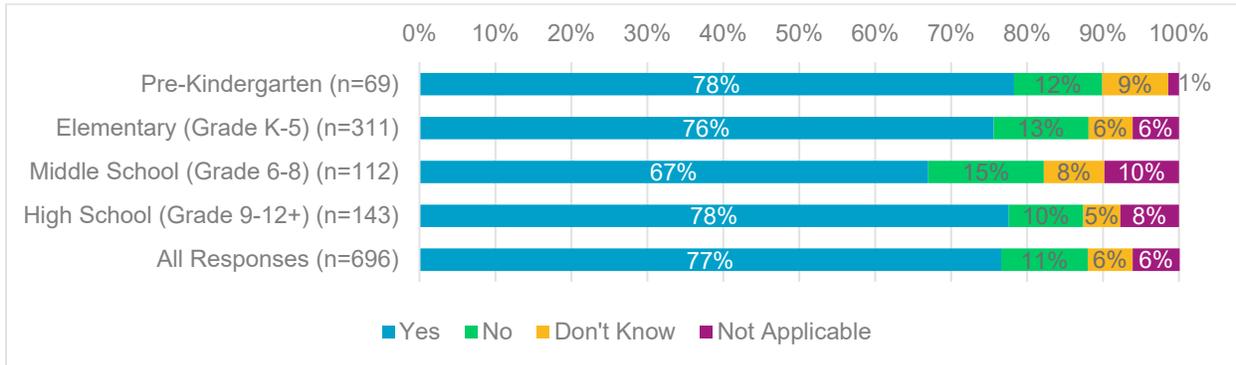
### Parent Survey

A large majority of parents (75 percent) responded that school staff discussed program placement with them prior to their child’s initial ARD. Similarly, a large majority of parents (77 percent) indicated that school staff discussed program placement with them prior to their child’s most recent ARD meeting.

**Exhibit 37. Parent Survey: School staff discussed with me program placement prior to my child’s initial ARD meeting.**

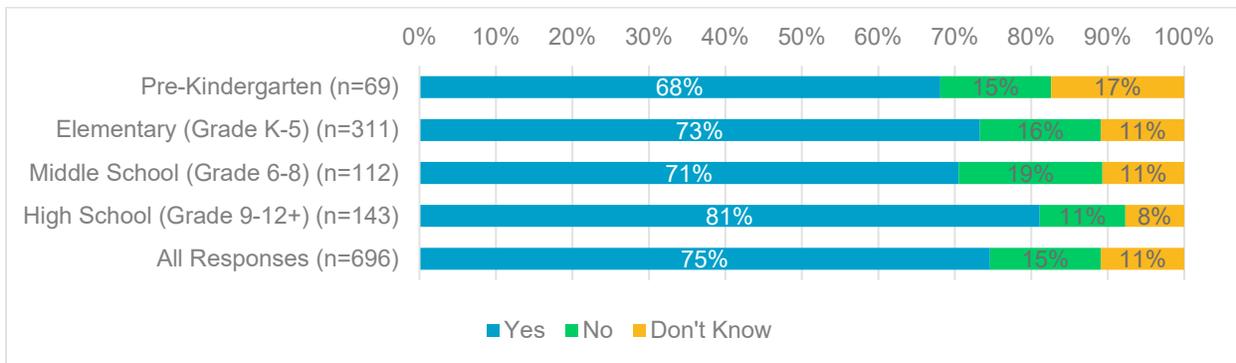


**Exhibit 38. Parent Survey: School staff discussed with me program placement prior to my child’s most recent ARD meeting.**



A majority of parents (75 percent) agreed that at their child’s last ARD meeting, the team discussed receiving special education services in the general education classroom. The level of agreement was higher for parents of students in high school (81 percent) and lower for parents of students in pre-kindergarten (68 percent).

**Exhibit 39. At your child’s most recent ARD meeting, did the team discuss receiving special education services in the general education class?**



Parents in GISD were surveyed to determine how the school district has approached conversations regarding a student’s placement. Data from the survey revealed that a staggering number of parents, 75 percent, reported that GISD staff discussed a more restrictive placement outside of the context of an ARD committee meeting. It is quite likely that GISD staff had good intentions to prepare parents for a difficult conversation; however, it is against federal regulations to make a placement decision without the input of all IEP team members, including the parent.

Collaborative decision-making around special education programming extends to the GISD facilities team. When considering more inclusive practices, it is essential that facilities team members are consulted from the inception of these moves. There are opportunities for increased collaboration around special education program restructuring and partnerships with facilities staff. When interviewed, facility staff members cited the importance of their role when ensuring new spaces meet both short-term and long-term special education programmatic requirements. They shared how the partnership currently works and how it can be improved upon:

- “Say that ABC class is moving from one school to another. Is there a list of specifications written anywhere?”
- “TEA guidelines tell us the size that special education classrooms need to be, the size of labs, etc. to be used as a baseline.”

- “A lot of the schools are older and small. Classrooms are 500 – 600 square feet, in some cases. It often takes two classrooms to make one special education classroom and may require knocking out walls.”
- “Special education classrooms are unique because they take a lot of space. Having us (facilities) in the planning allows us to really think about how to meet the students’ needs.”
- “All of things come into play like whether the classroom was intended for a younger age group, has enough space, etc.”
- “Facilities doesn’t want to be involved with every project but wants to circle in at the beginning and circle out if it’s not pertaining to facilities. We want to help programs be more efficient.”
- “We already have an annual process that is done for all programs. Departments meet annually as they are reviewing the programs in summer or mid-year. They just need to have facilities in the discussion at that meeting.”
- “We get involved at the delivery point which is too far down the road.”
- “What happens is someone calls us up and asks ‘Is this doable? Where should we put it?’”
- “We have all of the data on all facilities – know whether they can accommodate.”
- “The decisions made are not very methodical. Even when we decided, the team didn’t go out to make sure we had the proper facilities. We need to consider the involvement of transportation and facilities.”

### **Out of District**

Currently, GISD is not funding non-public out of district placements. There are existing contracts with two other Texas school districts to support students who are deaf or hard of hearing. GISD students who require more specialized programming are served within the district. As previously stated, federal statutes require that students with disabilities must receive FAPE within their LRE. This LRE continuum requires ARD teams to consider separate day schools and residential placements, when necessary. Moving forward, GISD needs to evaluate its procedures for ARD teams to determine when the most restrictive placements are necessary and discuss partnerships with surrounding residential programs.

### **IEP Development**

Once a student within GISD is found eligible for special education and related services, a parent must sign consent for the initial provision of services. Parental consent allows the school team to draft and implement an IEP. There are several key components of an IEP as required by federal statutes. These components include, but are not limited to<sup>66</sup>:

- A student’s present level of academic achievement and functional performance (PLAAFP),
- Annual goals,
- A description of the special education, related services and supplementary aids and services that will be provided,
- Information regarding how the student will participate in state and districtwide assessments,
- Transition services, when age-appropriate, and
- Other areas that must be addressed for children with certain disabilities, needs, or circumstances.

To support the consistent development of an IEP, the TEA has developed a model IEP form.<sup>67</sup> School-based ARD committees are not required to utilize the TEA model IEP form; however, it is suggested as a

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<sup>66</sup> “A Guide to the Individualized Education Program”, US Department of Education

[https://www2.ed.gov/parents/needs/speced/iepguide/index.html#:~:text=By%20law%2C%20the%20IEP%20must,present%20levels%20of%20educational%20performance\).](https://www2.ed.gov/parents/needs/speced/iepguide/index.html#:~:text=By%20law%2C%20the%20IEP%20must,present%20levels%20of%20educational%20performance).)

<sup>67</sup> “IEP Model Form” Guidance, TEA, <https://tea.texas.gov/academics/special-student-populations/special-education/programs-and-services/iep-model-form>

practice to ensure consistency. It is required for an ARD committee to consider the following pieces of data when drafting an IEP according to TEA expectations:<sup>68</sup>

- The student’s strengths and areas of growth,
- The results of the most recent evaluations, and
- The academic, developmental, and functional needs of a student.

In addition, the Parent’s Guide to the Admission, Review, and Dismissal Process Guide(2020) outlines the following as required special factors that must be addressed by the ARD committee when writing and/or revising a student’s IEP:<sup>69</sup>

- “Consider the use of positive behavioral interventions and supports and other strategies to address that behavior when a child’s behavior impedes learning,
- Consider the language needs of the child as those needs relate to the child’s IEP when the child qualifies as a child with limited English proficiency; provide for instruction in braille and the use of braille, unless the committee determines that instruction in braille or the use of braille is not appropriate for the child when the child is blind or visually impaired,
- Consider the communication needs of the child, and for the child who is deaf or hard of hearing, consider the child’s language and communication needs, opportunities for direct communications with peers and professional personnel in the child’s language and communication mode, academic level, and full range of needs, including opportunities for direct instruction in the child’s language and communication mode, and
- Consider whether the child needs assistive technology devices and services.”

### ***Present Levels of Academic Achievement and Functional Performance and Goal Development***

A student’s IEP contains several sections; however, among the most important of those sections are the IEP goals. Annual IEP goals that are ambitious, relevant, and measurable are an extraordinarily vital part of the IEP process. Systematic, ongoing assessment and reporting of student progress enables educators to “substantiate what the student is learning, the effectiveness of materials and methods being used during instruction, and the efficacy of the IEP.”<sup>70</sup>

The importance of well-written IEPs recently came to light in the recent U.S. Supreme Court case of *Endrew F. v. Douglas County School District*. As referenced earlier in this report, in this decision, the Supreme Court updated its prior standard for determining a school district’s provision of an appropriate education for students with disabilities. This case centered on the importance of establishing ambitious and challenging goals that enable each student to make academic and functional progress and advance from grade to grade. The IEP need not aim for grade-level advancement if that is not a reasonable prospect. However, the IEP must be appropriately ambitious given the student’s circumstances, just as advancement from grade to grade is appropriately ambitious for most children in the regular classroom. Goals may differ, but every student should have the opportunity to meet challenging objectives. The Supreme Court made it clear that IDEA demands more.

Within GISD, diagnosticians, LSSPs, and Related Service Providers evaluate to determine eligibility and draft the initial IEP. Case managers collaborate with evaluation staff to write goals. However, according to focus group participant feedback, there is no single staff member role that is responsible for evaluating a student, drafting their IEP, and subsequently providing instruction. According to a GISD interviewee, they shared that, “there are some instances where the Case Manager participating in the ARD meeting does not even have a relationship with the student. This can be a problem, and it does happen occasionally.” This

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<sup>68</sup> Parent’s Guide to the Admission, Review, and Dismissal Process July 2020

<sup>69</sup> Parent’s Guide to the Admission, Review, and Dismissal Process July 2020

<sup>70</sup> Gleckel & Koretz, 2008, p. 211

fractured approach to PLAAFP and goal development has led to IEPs described by GISD staff as “disconnected” and “inconsistent.”

Focus group participants, including those who completed file reviews, noted the following challenges regarding the PLAAFP and goal development:

- “Diagnosticians write PLAAFPs, but don’t write the way we (school-based teams) do. They don’t provide the information we need. We ask for FIE in advance, otherwise you don’t hear about it until ARD. They do not know the Texas standards. They say kids can’t do this, but they are not even supposed to have done that my that grade.”
- “Assessment staff are disconnected with how to determine strengths and weaknesses. Diagnosticians are good at reporting numbers, but not good at translating for case managers to create goals.”
- “The IEPs themselves are more so viewed as an exercise in paperwork rather than a critical document that can drive things.”
- “I heard from Diagnosticians that administration is on a different page. Special education staff say something else. Legally we’re going to do what we’re going to do, even if it does not make sense.”
- “Teachers don’t know where goals come from. They are not aligned as they should be to the specific student’s progress.”

Guidance on the development of the PLAAFPs and goals sections of an IEP has been issued by GISD special education leadership. The GISD Special Education Handbook provides context for both critical IEP components with IDEA expectations and supporting literature, including a description from the National Associate of State Directors of Special Education (NASDE) “Seven-Step Process to Creating Standards-based IEPs.” Below is an excerpt from the GISD Special Education Handbook outlining expectations for PLAAFPs purpose, content, and those responsible for developing and updating them:

Present Levels of Academic Achievement and Functional Performance (PLAAFPS) must include, a statement of how the disability affects the student’s involvement and progress in the general curriculum by identifying the skill strengths and deficits on the student’s enrolled grade level. Identification of strengths and areas of need should be based on an analysis of data such as current classroom performance, assessments, benchmark tests, etc.

The PLAAFPS must be completed prior to writing the goals (and objectives) and MUST be updated for each annual ARD. There should be a direct relationship between the PLAAFPS and the special education services provided. For example, if the statement describes a deficiency in a specific reading skill, this deficiency could be addressed under: (1) goals (and objectives); and/or (2) supplementary aids and services.

PLAAFPS for all new referrals or re-evaluations will be completed by the diagnostician/SLP and will be based on the evaluations that were most recently completed. The case manager will also complete the PLAAFPS with input from the general education teacher.

For student’s annual ARD the special education case manager is responsible for ensuring ARD/IEP paperwork is completed by all instructional and related service providers and is based on data gathered via progress monitoring.

In addition to this guidance, GISD leadership has developed another document to support Diagnosticians, SLPs, and Case Managers. The “eSPED Guidelines for PLAAFPs” is embedded in the GISD Special Education Handbook. It is important to note that interviewing participants for this study, neither the GISD Special Education Handbook guidance nor the “eSPED Guidelines for PLAAFPs” documents were referenced as tools used when discussing PLAAFPs. There appears to be a disconnect between guidance issued and how it is integrated into practice.

The GISD Special Education Handbook details expectations for IEP goal development and progress monitoring. Below is an excerpt outlining the processes GISD staff must adhere to when drafting and updating IEP goals:

1. Teachers are responsible for evaluating and recording progress of the goals (and objectives) each grading period and prior to the ARD meeting dates in eSped.
2. Indicate progress on goals (and objectives) in eSped at the end of each reporting period. The following codes will be used to report quantitative progress to align with students' quantitatively written goals (and objectives): WP for Work in Progress, M for Mastered, and NI for Not Yet Introduced along with the percentage of progress made based on data. **All goals (and objectives) must be updated.**
3. Updated goals (and objectives) must become a part of the annual ARD.
4. If some or all of the goals and possibly corresponding objectives were not mastered within the ARD year, an explanation should be written in the comments section when updating progress. New goals (and objectives) should be written so that the student is able to master the skill within the upcoming ARD year. These could be written with changes to the condition, skill or skill level, criterion.
5. Develop Present Levels of Academic Achievement and Functional Performance (PLAAFPs) by identifying the student's skills in relation to enrolled grade level TEKS. Identification of skill deficit areas should be based on an analysis of data such as current classroom, performance, assessments, benchmark tests, etc. **For areas of critical skill deficits, a goal (and objectives) MUST be written.** When analyzing data, attention should be focused on areas of deficiency and skills for the specific subject area and not a listing of test scores.
6. The new proposed goals (and objectives) will be developed based on disability related critical needs identified in the student's Present Level of Academic Achievement and Functional Performance (PLAAFPs).
7. Goals (and objectives) should demonstrate movement toward grade level instruction by the end of the ARD year. Goals (and objectives) should be written with the idea in mind that the student can achieve mastery by the next annual ARD.
8. Teachers are encouraged to include parents in this process by conferencing with parents about concerns and areas of need prior to developing goals (and objectives). A conference with a parent prior to the ARD/IEP meeting can provide parents time for questions that are more appropriately answered outside an ARD/IEP meeting.
9. The ARD/IEP committee may revise, rewrite, or expand the goals (and objectives), as it deems appropriate.
10. Special education teachers must learn and adhere to the procedures addressing goals (and objectives) in the ARD/IEP section of the Garland Independent School District Special Education Operating Guidelines.

Additional guidance in the form of checklists, including the "eSPED Guidelines for Goals and Objectives", are embedded within the GISD Special Education Handbook. It is unclear what internal processes are implemented and monitored to ensure that practitioners are adhering to this guidance. When interviewed as part of this study, no reference was made to either document as a basis for drafting and updating IEP goals.

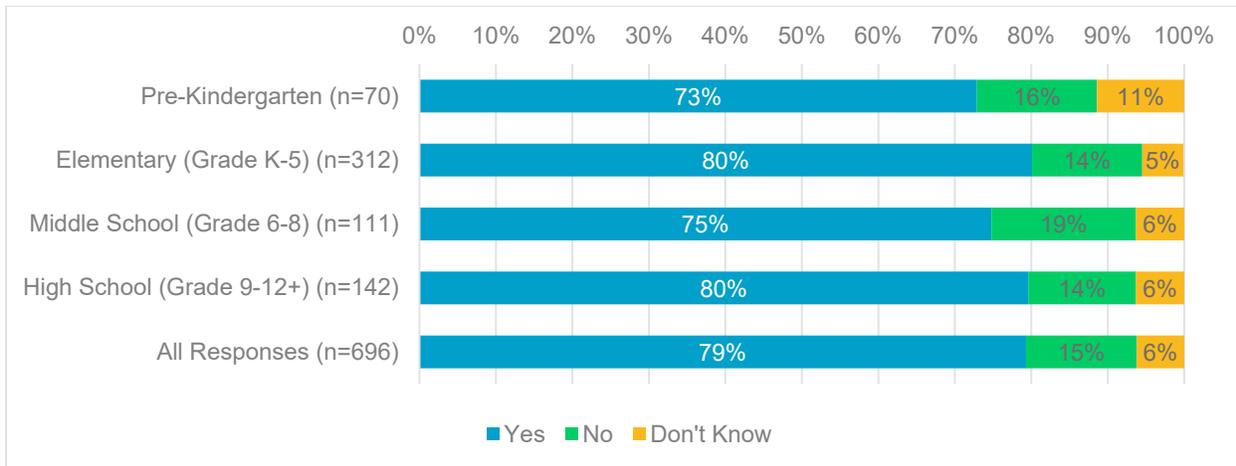
As members of the ARD committee, parents are given the opportunity to provide feedback in the development of their child's IEP, including the PLAAFP and goal sections. GISD staff reported a myriad of ways they gather parent feedback. Some ARD team members utilize formal tools, such as questionnaires to determine developmental and functional skills at home. Parents can provide anecdotal feedback regarding academic skill acquisition. According to the GISD Special Education Handbook, teachers are to

schedule a meeting with parents to discuss their concerns and suggested areas of need prior to drafting IEP goals.

### Parent Survey

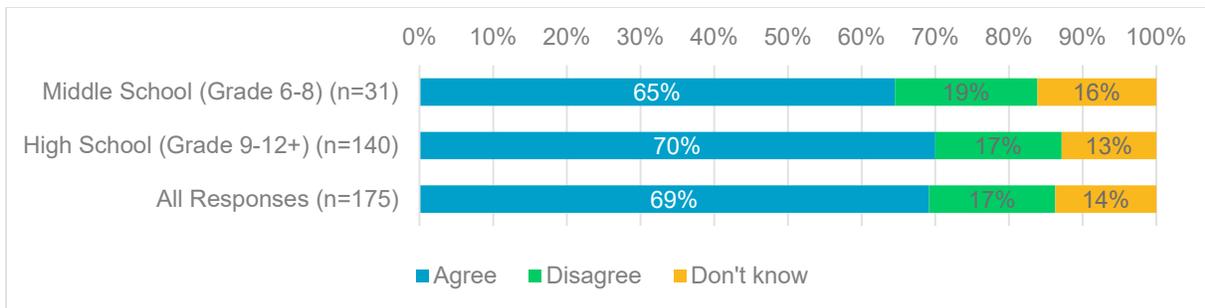
A large percentage of parents (79%) agreed that prior to their child’s last ARD meeting they were asked for input on their child’s IEP goals and objectives. Parents of students elementary (80%) and high school (80%) had higher levels of agreement, and parents of students in pre-kindergarten had a lower level of agreement (73%).

**Exhibit 40. Parent Survey: Prior to your child's last ARD meeting, were you asked for input on your child's IEP goals and objectives?**



Of the parents who indicated their child was 14 years of age or older, 69 percent agreed that the IEP team developed individualized goals related to postsecondary transition.

**Exhibit 41. Parent Survey: The IEP team developed individualized goals related to postsecondary education, employment, independent living, and community participation for my child.**



### Data Collection

Federal statutes require IEP teams to develop annual, measurable academic and/or functional IEP goals that are aligned to state standards. Each IEP goal should include benchmarks or short-term objectives as well as criteria to measure goal mastery and must address needs resulting from the student's disability. The purpose of developing high-quality IEP goals is to support the measurement of student progress toward goal mastery.

Progress monitoring is a research-based practice used to assess a student’s progress toward IEP goals and evaluate the effectiveness of instruction and intervention. Progress monitoring informs the teacher, student, and family regarding what a student has learned and what requires additional intervention

or still needs to be taught. Federal statutes require IEPs to contain a description of how the student's progress will be measured and how often reports on progress will be provided.

During focus group interviews, GISD staff shared a common misconception that progress targets must be set at 70% mastery. A file review was conducted as part of this comprehensive review, and the data revealed that IEPs reviewed consistently had goals set at 70% mastery. Anecdotally, it was reported that GISD staff members gather informal IEP progress data indicating, on average, a 10% increase towards mastery until reaching 70%. One staff member reported that this practice is considered "controversial" but "a district rule of thumb."

Staff shared additional feedback:

- "I've never gotten written guidance, but this was given as the middle ground or something you can use as 'achievable' when they were trained by the district."
- "I have worked with Garland since ALE was called 'LIFE' and the HS students may have a lower goal for a content area, but the department head (previous administrator) said to use 70%."
- "For behavior goals, we will look for 70% because that is what is expected for 'passing' in classes; we want to make the goals challenging but not too challenging."
- "When we write our ALE goals, they are more detailed in Garland than other districts – when we base the goals on 70%, the thinking is that 70% is passing in a 'regular' class."
- "ALEs are on 70% at a time."
- "Someone said just mark 10% every grading period until they get to 70% to just to show you are making some progress."
- "The 'old school' approach is 70% for two consecutive grading periods. This equals mastery."
- "I heard you're supposed to mark 70% for two semesters."

PCG conducted extensive document analysis as part of this comprehensive special education review. The GISD Special Education Handbook provides specific policy and process guidance, including special education progress monitoring. Below is an excerpt from the handbook outlining GISD special education leadership staff expectations for progress reporting:

Meeting or exceeding criteria of IEP goals and/or objectives for two consecutive grading periods is necessary for IEP goal (and objectives) mastery.

Progress must be reported in the same manner as the goal (and associated objectives) is measured. For example, if the goal (and objectives) state that the child will master a goal and/or objective 4 out of 5 times, then progress reported must reflect how many times out of 5 times the student is able to accomplish the goal (and objectives). If the goal (and objectives) is written as a percentage, then progress must be reported as a percentage. Simply noting things such as "progress being made" or "continuing" are not adequate for reporting progress.

While the passing standard for a course/assignment is generally 70%, the criterion should specify the amount of growth expected to meet the annual goal, not the score required for passing the course/assignment. The criterion should be based on how the progress will be measured, and this may not always be a percentage measure.

The percent of progress on the updated goals (and objectives) does not translate to grades for the report card. Grades are derived from daily work assignments and classroom tests.

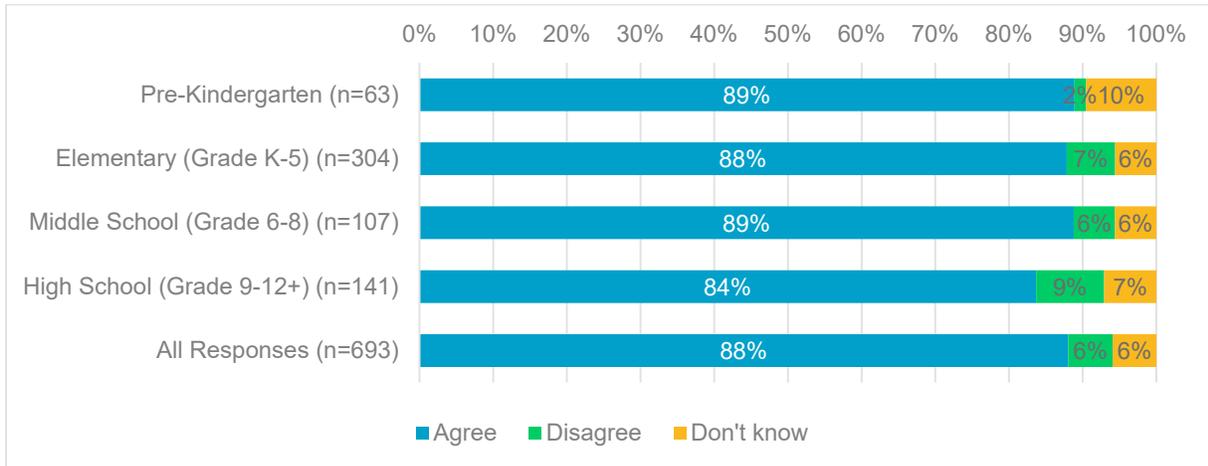
As outlined in the GISD Special Education Handbook, Case Managers are to update progress on a student's goals and objectives in eSped each grading period. Progress reports are sent to parents, and copies of this communication must be maintained by Case Managers. Case managers also use the Xlogs program to capture student progress. A focus group participant shared: "It would be nice if we had systems that talk together, automatic updates. It seems like eSped does not automatically create a new ARD in Xlogs like it's supposed to do." GISD staff have reported making genuine attempts to provide meaningful

progress monitoring feedback but are struggling to do so with the limited functionality of XLogs. Specifically, “XLogs is not user friendly, so I keep a paper copy – especially since I’ve lost data before. XLogs was even worse when we first got it.”

### Parent Survey

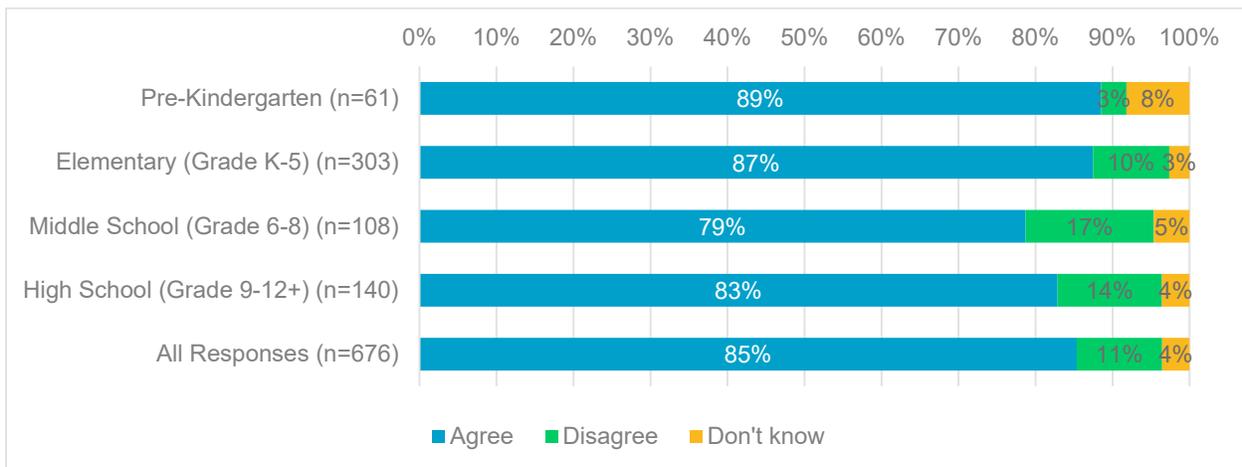
When asked if their child’s IEP tells them how progress towards goals will be measured, 88 percent of parents agreed.

**Exhibit 42. Parent Survey: My child’s IEP tells how progress towards goals will be measured.**



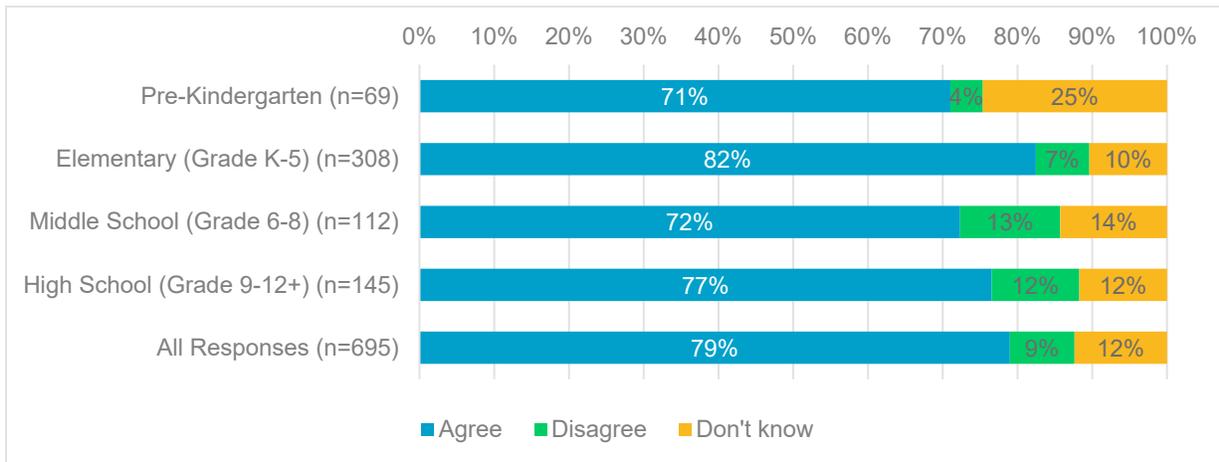
A large percentage of parents (85%) agreed that they receive reports on their child’s progress towards meeting IEP goals. A smaller percentage (79%) of parents whose children are in middle school agreed.

**Exhibit 43. Parent Survey: I receive reports on my child’s progress towards meeting his/her IEP goals.**



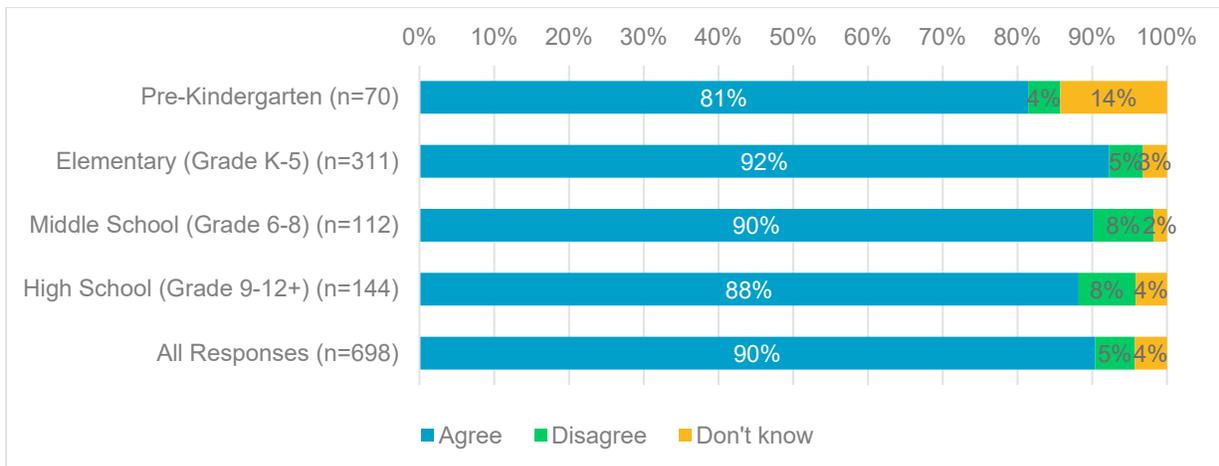
Of the parents who responded to the survey, the majority (79%) felt that they were a valued member of the ARD team. Parents of students in middle school agreed to a lesser extent (72%).

**Exhibit 44. Parent Survey: I am a valued member of the ARD team.**



A large percentage of parents who responded to the survey (90%) agreed that they felt comfortable asking questions at ARD meetings. Parents of students in pre-kindergarten agreed to a lesser extent (81%).

**Exhibit 45. Parent Survey: I feel comfortable asking questions at ARD meetings.**

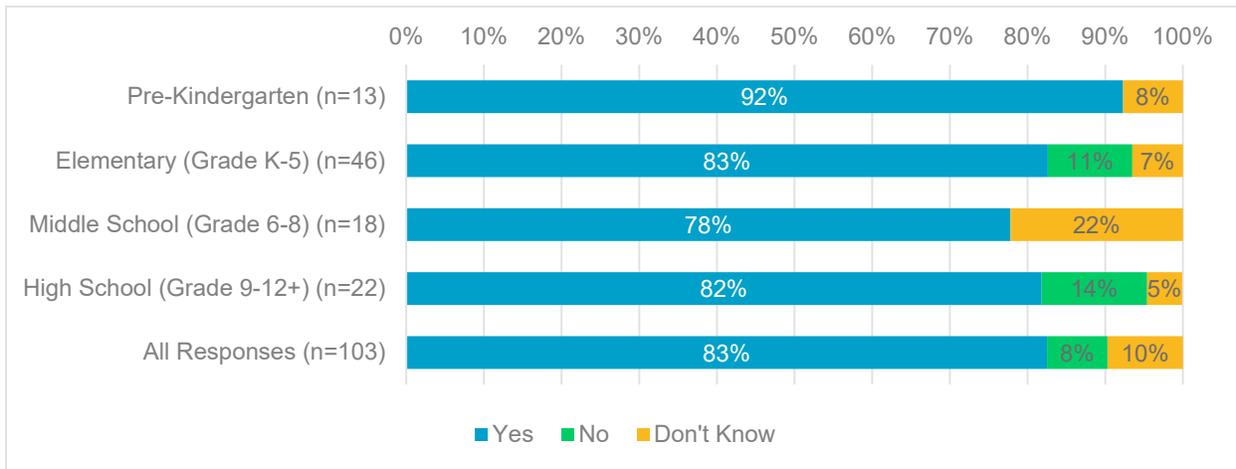


## Compliance

During the 2019-20 and the 2020-21 school years, there have been no Office of Civil Rights complaints filed. Additionally, no Due Process Complaints were filed during the 2019-20 school year. Currently, there is one due process request (February 2021). GISD staff interviewed as part of this review have alluded to both procedural and FAPE violations; however, this has not materialized into parents taking formal action to address compliance issues.

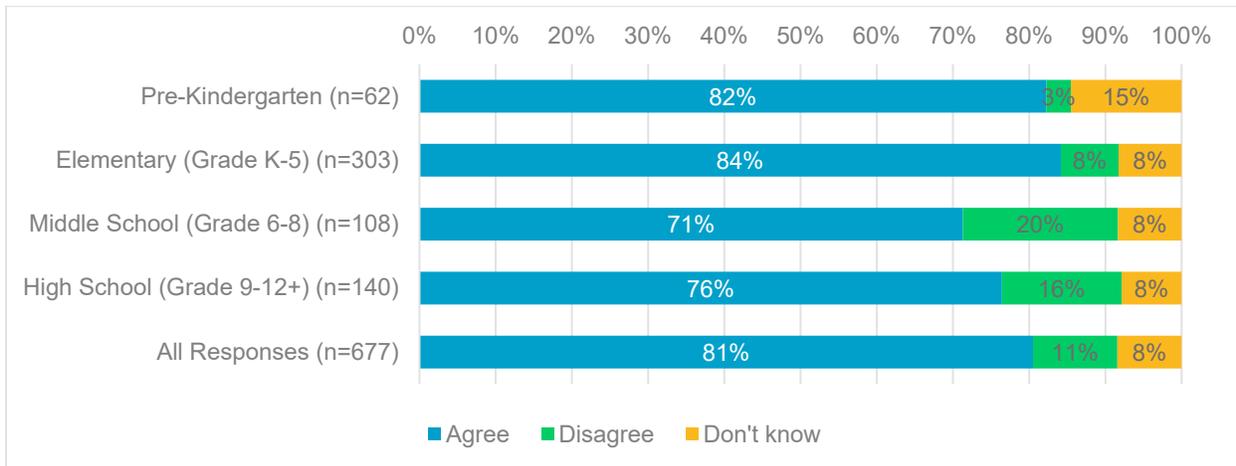
GISD parents have taken the initiative to engage school teams with concerns about their student's IEP implementation. These concerns are often resolved at the school level or in consultation with GISD district leadership, according to participant reports. Moving forward, it is recommended that the GISD parent base become more fluent in their rights as parents of students with disabilities in order to advocate for their children. Survey data was gathered from parents regarding access to translated IEP documents. Of the parents who indicated they required language translation services to better understand their child's education needs, 83 percent responded that they were provided a translated IEP document.

**Exhibit 46. Parent Survey: Were you provided a translated IEP document?**



Furthermore, a large majority of parents who responded to the survey (83%) agreed that their child is getting the amount and type of services that are listed in the IEP. This high percentage of parent agreement supports the low volume of complaints filed in GISD.

**Exhibit 47. Parent Survey: My child is getting the amount and type of services that are listed in his/her IEP.**



## Individualized Supports

### *Achievement: School Aged Students*

This section provides a longitudinal analysis of outcomes for school-aged students and those receiving special education based on the following TEA assessment measures: 1) State of Texas Assessments of Academic Readiness (STARR), 2) Progress of Prior Year of Non-Proficient Students, 3) Student Success Initiative Requiring Accelerated Instruction, 4) Texas Success Initiative Assessment (TSIA), and 5) the latest SPP data for Garland.<sup>71</sup>

<sup>71</sup> The source for TEA's State Performance Plan is <https://rptsvr1.tea.texas.gov/idea/index.html>; and the source for the 2018-19 Texas Academic Performance Report (2018 and 2019 data) is [https://rptsvr1.tea.texas.gov/cgi/sas/broker?\\_service=marykay&year4=2019&year2=19&\\_debug=0&single=N&batch=N&app=PUBLIC&title=2019+Texas+Academic+Performance+Reports&\\_program=perfreport.perfmast.sas&ptype=H&paper=N&level=district&search=district&namenum=Garland+ISD&district=057909&prgopt=2019%2Ftapr%2Fpaper\\_tapr.sas](https://rptsvr1.tea.texas.gov/cgi/sas/broker?_service=marykay&year4=2019&year2=19&_debug=0&single=N&batch=N&app=PUBLIC&title=2019+Texas+Academic+Performance+Reports&_program=perfreport.perfmast.sas&ptype=H&paper=N&level=district&search=district&namenum=Garland+ISD&district=057909&prgopt=2019%2Ftapr%2Fpaper_tapr.sas) and the 2016-17

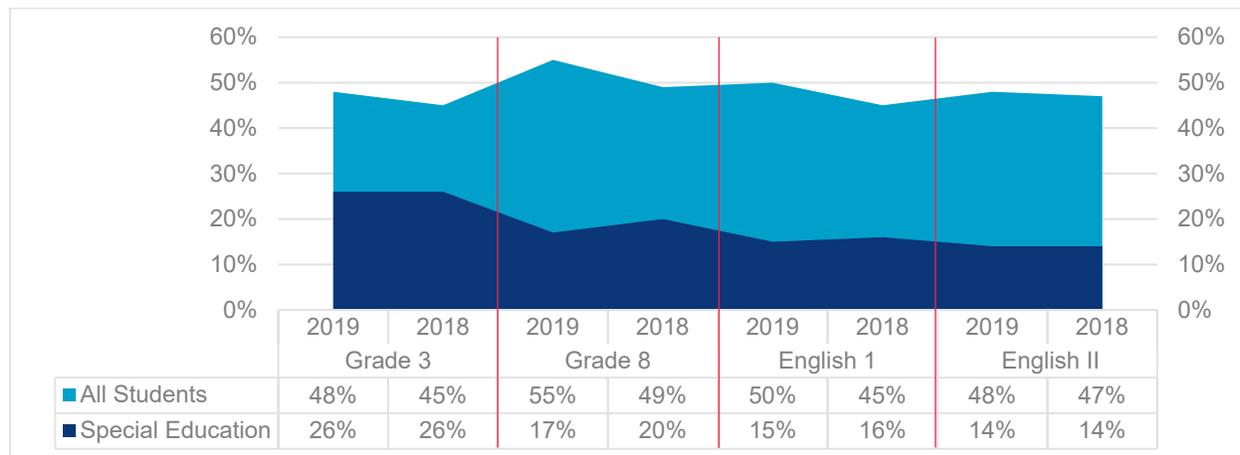
## Reading Outcomes

### STARR Reading (Grades 3 and 8) and EOC English I/II

The Exhibit below shows 2018 and 2019 STARR reading percentages of all students and of identified students for special education who met/exceeded grade-level reading standards for grades 3 and 8 and English I/II end of course (EOC) tests.

- **Grade 3.** The performance of all students increased from 45% to 48%, while special education rates were flat (26%).
- **Grade 8.** The performance of all students increased from 49% to 55%, while special education rates fell from 20% to 17%.
- **EOC English I.** The performance of all students increased from 45% to 50%, while special education outcomes decreased from 16% to 15%.
- **EOC English II.** The performance of all students decreased from 48% to 47%, while special education rates were flat (14%).

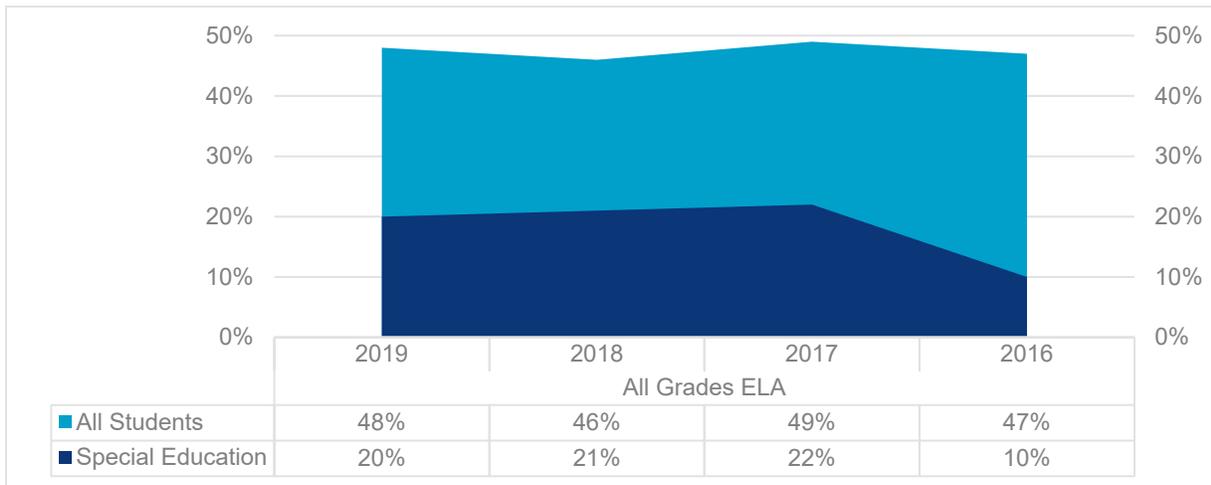
Exhibit 48. Grades 3 & 8 Reading and English I/II: Met/Exceeded Standards (2018 & 2019)



### STARR Reading (All Grades)

The exhibit below shows percentages of all students and those receiving special education in all grades who met/exceeded grade-level reading standards in 2016 through 2019. During this period, the all-student rate increased one percentage point (47% to 48%) while the special education rate doubled (10% to 20%).

**Exhibit 49. All Grades STARR Reading: Met/Exceeded Standards (2018 & 2019)**



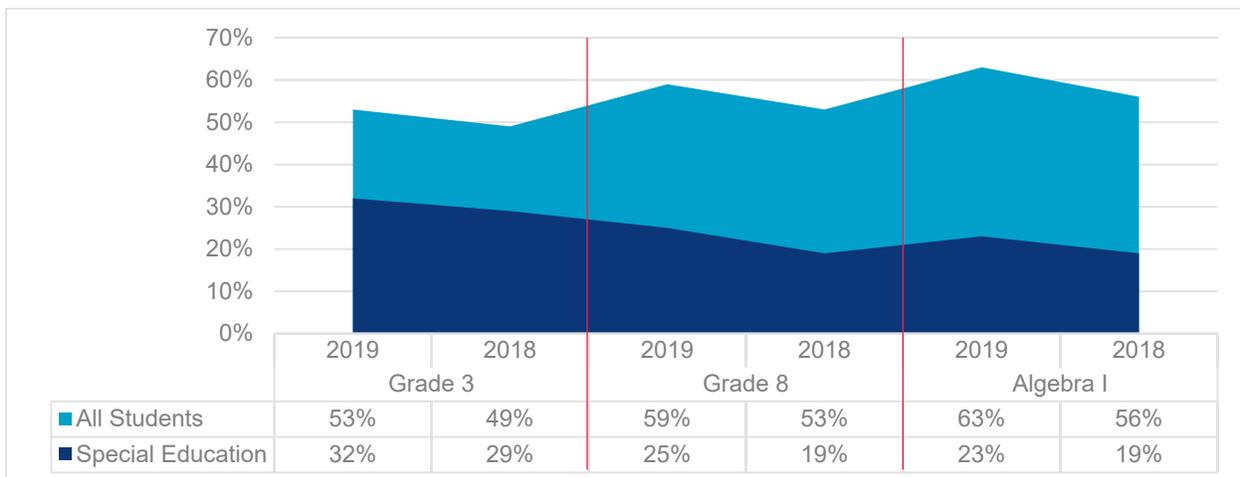
### Math Outcomes

#### STARR Math (Grades 3 and 8) and EOC Algebra I

The exhibit below shows 2018 and 2019 percentages of all students and of those receiving special education who met/exceeded grade-level math standards for grades 3 and 8 and the Algebra I end of course (EOC) test.

- **Grade 3.** The all-student rate increased from 49% to 53%, while the special education rate increased from 29% to 32%.
- **Grade 8.** The all-student rate increased from 53% to 59%, while the special education rate fell from 19% to 25%.
- **EOC Algebra I.** The all-student increased from 56% to 63%, while the special education rate increased from 19% to 23%.

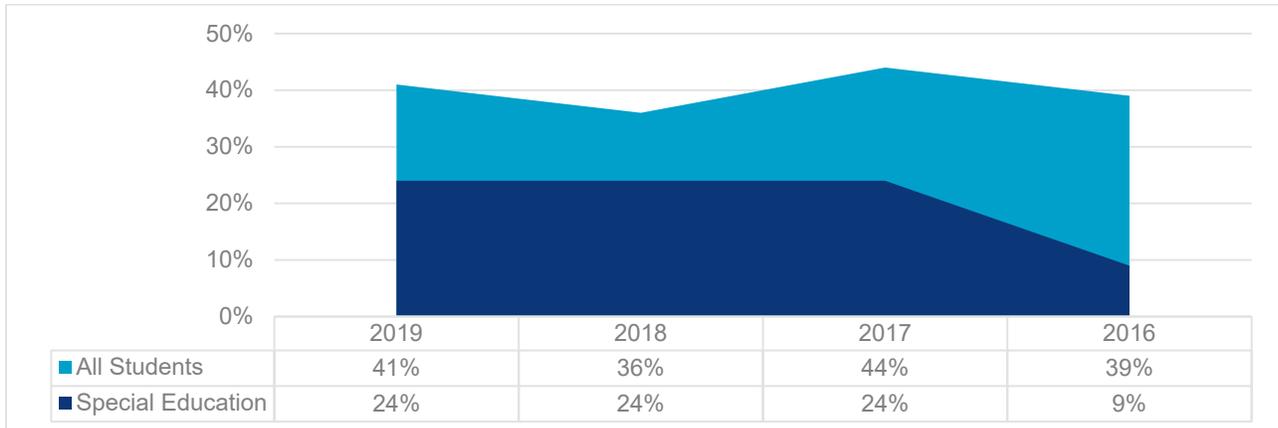
**Exhibit 50. Grades 3 & 8 Math and EOC Algebra: Met/Exceeded Standards (2018 & 2019)**



#### STARR Math (All Grades)

The exhibit below shows percentages of all students and those receiving special education in all grades who met/exceeded grade-level math standards in 2016 through 2019. During this period, the all-student rate increased from 39% to 41%, while the special education rate increased significantly from 9% to 24%.

**Exhibit 51. All Grades STARR Math: Met/Exceeded Standards (2018 & 2019)**

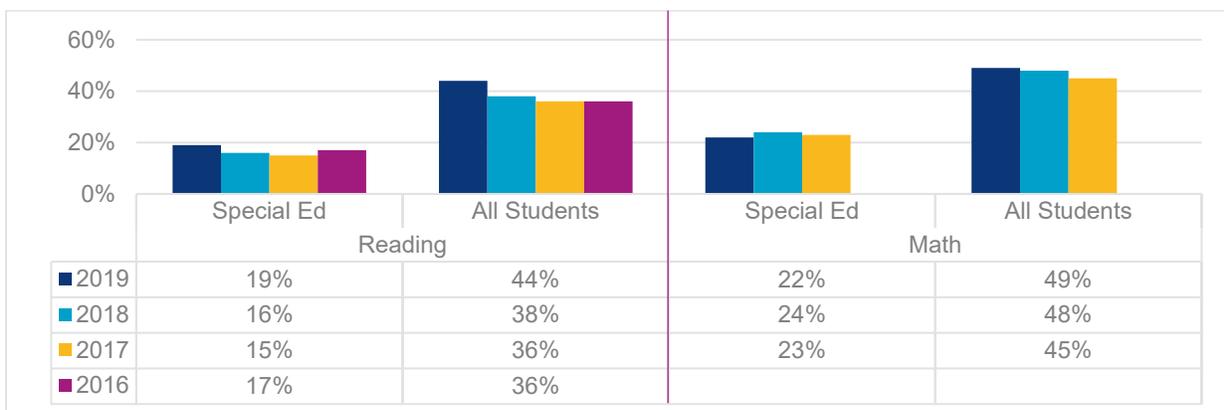


### **Progress of Prior Year Non-Proficient Students**

The exhibit below shows for grades 4 through 8, the all-student and special education group rates of students who did not reach the meet standard on STARR in the prior year but passed the corresponding assessment in the current year.

- **Reading.** From 2016 to 2019 the all-student rate increased by 8 percentage points (36% to 44%) while the special education rate increased by 2 points (17% to 19%).
- **Math.** From 2017 to 2019 the all-student group rate increased by 4 percentage points (45% to 49%) while the special education rate decreased from 23% to 22%, after a brief 2018 increase to 24%.

**Exhibit 52. Grades 4-8 Percentages for All-Student and Special Education Groups Progressing from Not Meeting to Meeting/Exceeding Standards (2016-2019)**



### **Student Success Initiative Requiring Accelerated Instruction**

Texas' Student Success Initiative establishes grade advancement requirements for students enrolled in grades 5 and 8 who take the STARR reading and math tests at those grades. Under these requirements, a student may advance to the next grade only by passing these tests or by a unanimous decision of his/her

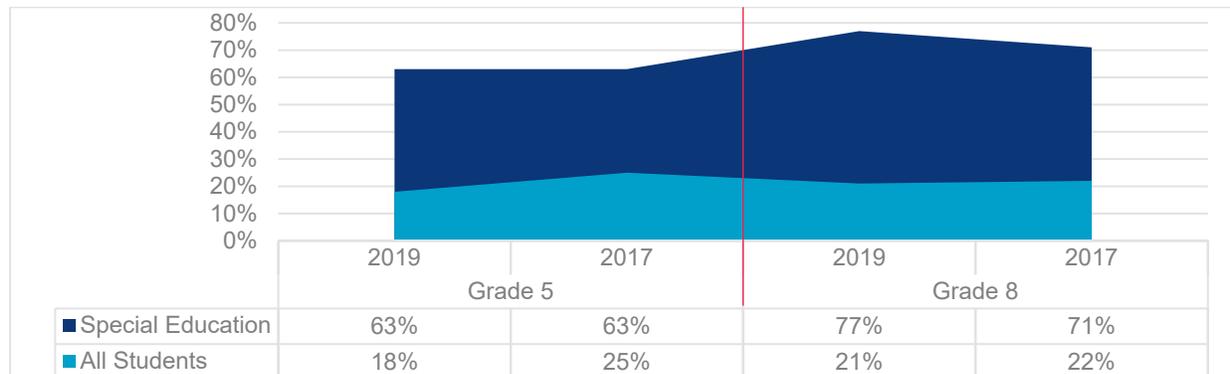
grade placement committee that the student is likely to perform at grade level after additional instruction.<sup>72</sup> For students receiving special education, the ARD committee determines how the student will participate in accelerated instruction and whether the student has made sufficient progress in his/her IEP measurable academic goals to allow for promotion.

### Students Requiring Accelerated Instruction (2017 and 2019)

The Texas Academic Performance Report includes student group percentages of students requiring accelerated instruction. Rates for 2017 and 2019 are shown for the all-student and special education groups to show changes over this time.

- **Grade 5.** The all-student 63% rates for required accelerated instruction were the same for both 2017 and 2019, while the special education rate decreased from 25% to 18%.
- **Grade 8.** The all-student rate increased from 71% to 77%, while the special education group rate decreased from 22% to 21%.

**Exhibit 53. Percentages of All-Student and Special Education Groups Requiring Accelerated Instruction**



### Students with Not Proficient Scores Promoted Based on Placement/ARD Committee

In 2018, 100% of all students receiving special education were promoted by their ARD committees. For the grade 5 all student group, 98% were promoted by their placement committee. For the grade 8 all student group, promotions occurred for 100% of students who were not proficient in reading and for 99% in math.

### Texas Success Initiative Assessment (TSIA)

The TSIA is an assessment designed to determine a student’s readiness for college-level coursework in the general areas of English language arts and math. The TSIA, or one of its exemptions, has been required for Texas students entering a Texas college or university. Students scoring at or above cut scores are considered “college-ready” and eligible to enroll in any entry-level college course.<sup>73</sup> The Exhibits below show percentages of all students and special education groups who met cut scores in English Language Arts (ELA) and math from 2016 through 2019.

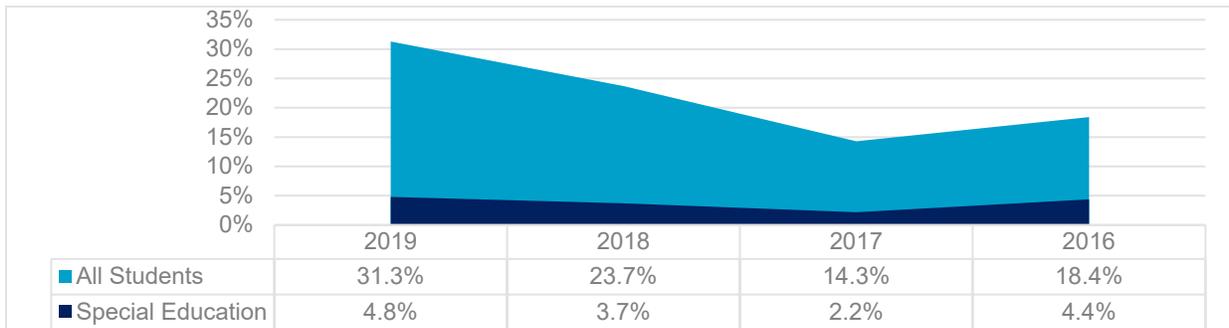
### English Language Arts

The all-student ELA proficiency rate increased by 12.9 percentage points (18.4% to 31.3%), while the special education rate increased by 0.4 points (4.4% to 4.8%).

<sup>72</sup> “Student Success Initiative”, TEA, <https://tea.texas.gov/student-assessment/testing/student-assessment-overview/student-success-initiative> and <https://tea.texas.gov/sites/default/files/2020-21%20STAAR%20SSI%20EducatorGuide%20Sept.pdf>

<sup>73</sup> Student Success Initiative”, TEA, <https://tea.texas.gov/academics/college-career-and-military-prep/the-tsia-texas-success-initiative-assessment>

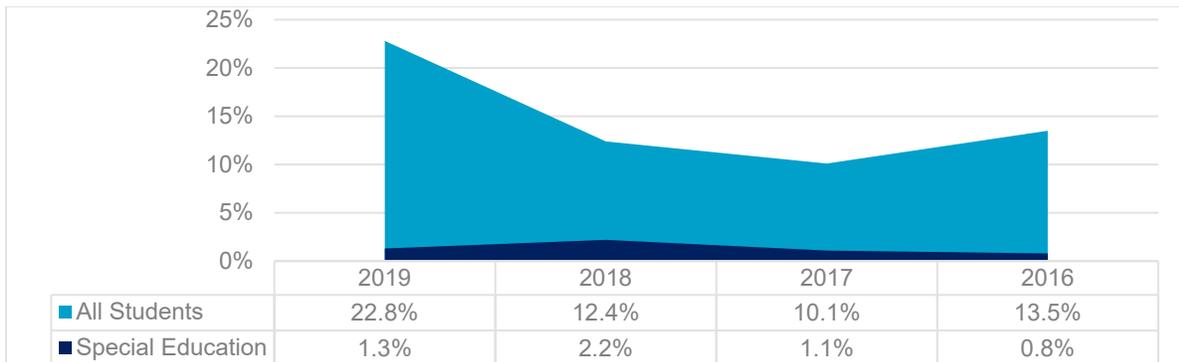
**Exhibit 54. Percentages of All-Students & Special Education Groups Meeting TSIA ELS Standards (2015-18)**



### Math

The all-student math TSIA proficiency rate increased by 9.3 percentage points (13.5% to 22.8%), while the special education rate increased by 0.5 points (0.8% to 1.3%). Also, the special education rate decreased from 2.2% in 2018 to 1.3% in 2019.

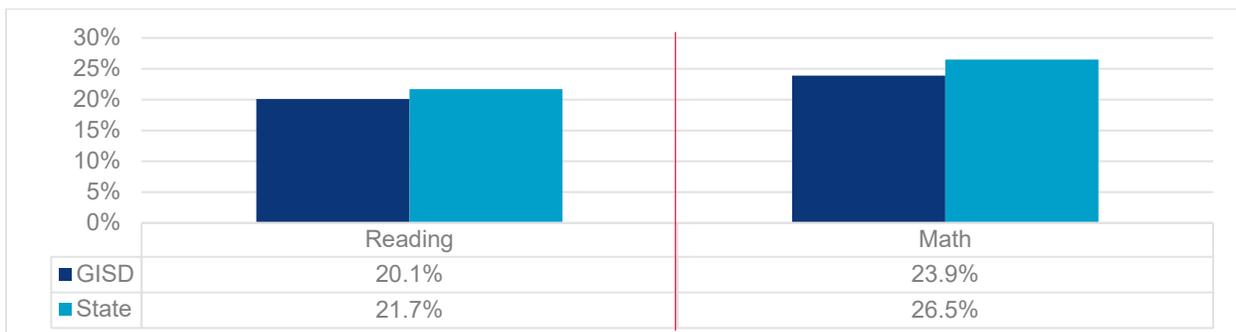
**Exhibit 55. Percentages of All-Students & Special Education Groups Meeting TSIA Math Standards (2015-18)**



### State Performance Plan Achievement

The exhibit below shows 2018-2019 outcomes for the SPP indicator that measures percentages of identified students for special education who met/exceeded statewide assessment standards. For reading, 20.1 percent of GISD students were proficient in reading compared to 21.7 percent of state students. For math, 23.9 percent of GISD students were proficient compared to 26.5 percent of state students. The latest SPP for 2018-19 had a state target of 98 percent for this indicator.

**Exhibit 56. State & GISD Special Education Proficiency Percentages (2018-19)**

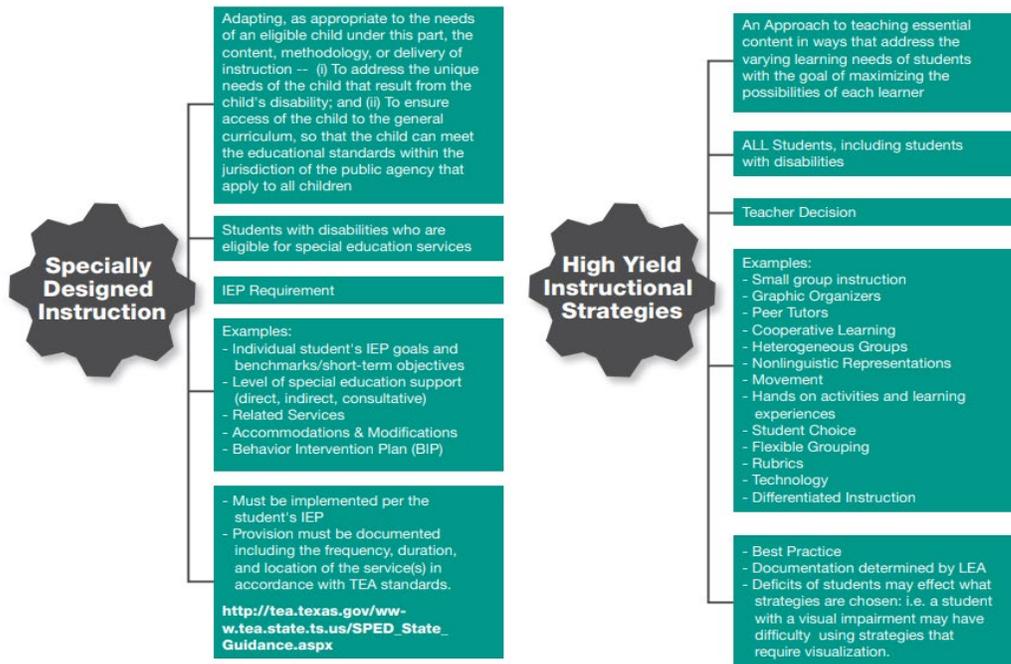


## Specially Designed Instruction

Specially Designed Instruction (SDI) is the hallmark component of special education and the role of special educators. SDI can be confused with other teaching approaches, such as differentiation or providing accommodations and modifications. IDEA regulations define SDI as “adapting, as appropriate to the needs of an eligible child under this part, the content, methodology or delivery of instruction (i) to address the unique needs of the child that result from the child’s disability; and (ii) ensure access of the child to the general curriculum, so that the child can meet the educational standards within the jurisdiction of the public agency that apply to all children.”<sup>74</sup> Students with disabilities are entitled to SDI that is delivered by a qualified professional within their least restrictive environment. Specifically, SDI is designed to address specific skill deficits a student needs in order to access and make progress within the general education curriculum.

The TEA and the Statewide Progress in the General Curriculum Network developed an SDI resource document for teachers. This document was intended to provide information to teachers who are assigned students receiving special education services and participate in the implementation of an IEP.<sup>75</sup> The guidance within outlines the functional and legal differences between high yield practices and SDI.<sup>76</sup>

### Specially Designed Instruction vs. High Yield Instructional Strategies



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A series of themes emerged when analyzing the narrative data provided by study participants as it relates to SDI. It was noted that there was a lack of district-level guidance provided to GISD staff defining SDI and how it should be implemented across the LRE continuum. One study participant shared that, “our teachers

<sup>74</sup> IDEA Regulations, (34 CFR Sec. 300.39(b)(3), US Department of Education  
<https://sites.ed.gov/idea/regs/b/a/300.39/b/3/i>

<sup>75</sup> “Specially Designed Instruction: A Resource for Teachers”, TEA,  
<https://projects.esc20.net/upload/page/0103/docs/20984-Specially%20Designed%20Instruction-Print-Update2018.pdf>

<sup>76</sup> “Specially Designed Instruction: A Resource for Teachers”, TEA,  
<https://projects.esc20.net/upload/page/0103/docs/20984-Specially%20Designed%20Instruction-Print-Update2018.pdf>

are spending too much time documenting and not enough time doing the specialized instruction.” Similarly, another participant stated, “there has not been a connection with what special education truly is and a key factor is Specially Designed Instruction. For example, on an IEP you might see ‘15 minutes of inclusion’ without any detail around what Specially Designed Instruction is included in that 15 minutes.” This question of “what is SDI?” and “how is it functionally implemented, particularly with 15-minute intervals?” was repeatedly raised throughout interviews and focus groups.

This lack of clarity around SDI and how it can be implemented in accordance with state-level guidance is addressed in the TEA and the Statewide Progress in the General Curriculum Network resource guide. Below is a graphic outlining the roles and responsibilities of general and special educators when providing SDI across two LRE settings for students with disabilities<sup>77</sup> The guidance document states that “this is not meant as a guide of who instructs what portion of the lesson, but how to collaborate regarding SDI and high yield instructional strategies.”<sup>78</sup>

|                                     | General Education  |   | Special Education Setting   |   |
|-------------------------------------|--|---|---|---|
|                                     | General Educator   | Special Educator  | General Educator  | Special Educator  |
| High Yield Instructional Strategies | <p>Understand the strengths and weaknesses, and present levels of instruction of all students.</p> <p>Focuses on mastery of TEKS.</p> <p>Utilizes special educator’s knowledge of the student who receives special education services and strategies to implement in the general education classroom.</p>                            | <p>Understand the learning styles, strengths and weaknesses, and present levels of instruction of students receiving special education services.</p> <p>Supports the general educator in understanding the learning style and present levels of the student.</p> <p>May assist the general educator in accommodating assignments and instructional materials.</p> <p>May model strategies for general educators to use with students.</p> <p>Focuses on access to the general curriculum.</p> | <p>Supports the special educator in utilizing strategies to instruct all students in their special education setting.</p>   | <p>Utilizes high yield instructional strategies when instructing.</p>   |
| Specially Designed Instruction      | <p>Integrates SDI into the lesson planning process and considers SDI when creating learning activities, assignments, assessments and projects.</p> <p>Implements SDI as appropriate on an individualized basis as defined by the IEP, including frequency, duration, and location.</p> <p>See IEP for specific responsibilities.</p> | <p>Implements SDI with students receiving special education services as per their IEPs.</p> <p>Supports the general educator in understanding the details of the students IEP and the SDI they should receive during instruction.</p> <p>See IEP for specific responsibilities.</p>   | <p>Collaborates with special educator regarding curriculum and proper modifications to meet individualized needs.</p> <p>See IEP for specific responsibilities.</p> | <p>Implements SDI with students receiving special education services as per their IEPs.</p> <p>See IEP for specific responsibilities.</p> |

No formal guidance was issued in the resource document outlining time intervals for SDI, rather the document encourages an ARD team to think collaboratively on how to provide SDI. Executing SDI, along with other elements of an IEP, requires collaboration and accountability across teams. One participant shared that “a lot of times the principals assume what’s in the IEP is actually going on in the classroom. It’s like no one is really checking to see that the student is getting what is in the IEP and we only hear about it when an issue emerges. Again, reactive, not proactive.”

The following comments on SDI as it relates to collaboration and accountability supporting students with disabilities were gathered from building leaders, district administrators, and GISD staff in interviews and focus groups:

- “We need explicit training. We’ve had compliance training; but we struggle with what it (SDI) actually looks like in the classroom.”
- “It would serve our teachers and students better if they are provided with training on how it (SDI) actually happens. Training on SDI instructional planning and the practice of modifying.”
- “Coordinators cannot identify what SDI is being applied.”
- “The students aren’t learning anything that is connected to what they are doing in their grade-level class.”

<sup>77</sup> Texas Education Agency and the Statewide Progress in the General Curriculum Network <https://projects.esc20.net/page/pgc.home>

<sup>78</sup> Texas Education Agency and the Statewide Progress in the General Curriculum Network <https://projects.esc20.net/page/pgc.home>

- “I told them that if teachers are applying the right intervention students with disabilities should be making substantial progress. Gaps should be closing, and that isn’t considered here as a possibility.”

Providing SDI to close achievement and performance gaps for students with disabilities has been identified as a priority to GISD staff. However, the district has become increasingly reliant on paraprofessionals for providing specialized instruction for students with disabilities. According to the TEA resource, “paraprofessionals may provide SDI to students receiving special education services when a certified special education teacher designs the SDI, and the paraprofessional is under the supervision of the certified special education teacher.”<sup>79</sup> Additional clarification regarding the role of paraprofessionals in providing SDI was found within the *Working with Paraprofessionals: A Resource for Teachers of Students with Disabilities*.<sup>80</sup> This document outlined the following as instructional expectations not within the scope of a paraprofessional regardless of special educator supervision<sup>81</sup>:

- Develop lesson plans,
- Introduce new material/content,
- Provide direct teach portion of the lesson,
- Select materials for implementation of the lesson,
- Assign final grades,
- Be responsible for any IEP-related responsibilities without supervision of a certified special educator,
- Develop IEP goals/objectives,
- Design the classroom management system, and/or
- Be responsible for determining or reporting student progress (general class progress or IEP goal progress).

## Parent Survey

Parents were asked to evaluate the capacity for staff serving students with IEPs to meet their child’s needs.

On surveys, an overall majority (73%) of parents agreed that the paraprofessional assigned to their child possessed the knowledge to address their child’s learning needs. The percentage of parents of children in middle school who agreed (60%) was substantially lower than the overall average. In focus groups, some parents noted concern regarding limited training and support for aides and paraprofessionals.

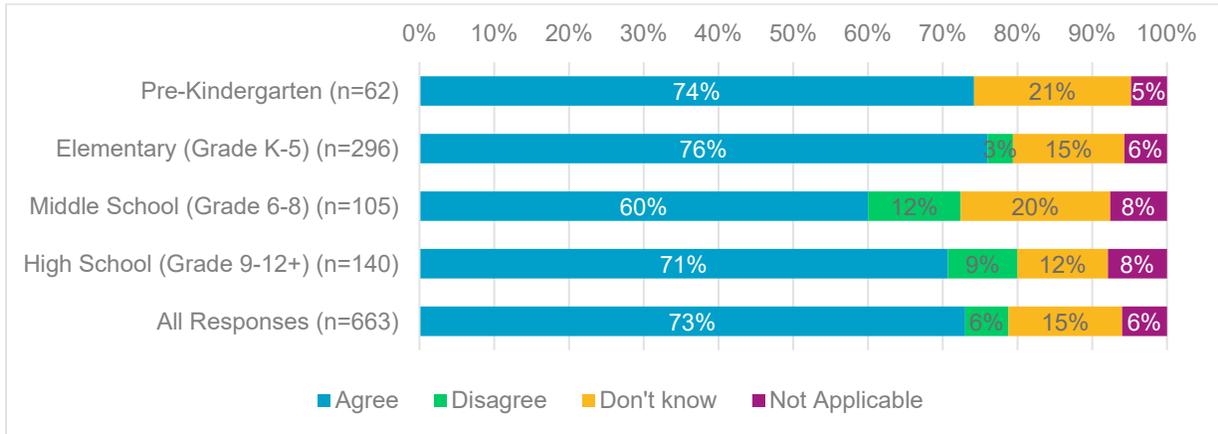
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<sup>79</sup> Specially Designed Instruction: A Resource for Teachers”, TEA,  
<https://projects.esc20.net/upload/page/0103/docs/20984-Specially%20Designed%20Instruction-Print-Update2018.pdf>

<sup>80</sup> “Working with Paraprofessionals”, PGC and TEA  
[https://projects.esc20.net/upload/shared/20984\\_Paraprofessional\\_English\\_Updated\\_508.pdf](https://projects.esc20.net/upload/shared/20984_Paraprofessional_English_Updated_508.pdf)

<sup>81</sup> “Working with Paraprofessionals”, PGC and TEA  
[https://projects.esc20.net/upload/shared/20984\\_Paraprofessional\\_English\\_Updated\\_508.pdf](https://projects.esc20.net/upload/shared/20984_Paraprofessional_English_Updated_508.pdf)

**Exhibit 57. Parent Survey: The paraprofessionals assigned to support my child possess the knowledge to address their learning needs.**



Responsive staffing models are essential in order to meet the needs of students with disabilities in accordance with federal, state, and local regulations. Staffing allocations by building are determined prior to the start of the school year based upon enrollment needs at that point in time.<sup>82</sup> One recurring concern across respondents was the lack of responsiveness and fluidity of staffing allocations throughout the school year. Relying on a stringent number of staff, particularly support staff, with little to no room for diversification to support changing enrollment needs, has a direct implication on SDI for students with disabilities. GISD study participants shared the following:

- “Special education teachers also support behavior issues in addition to teaching.”
- “Aides get pulled for substitute teaching, so the students don’t get their push-in time in the classroom.”
- “Things being planned for the school or upcoming school year are not shared with paras. There’s a lack of communication. They are always the last to know (e.g., staff absences, moving of classrooms because of significant needs like hitting, spitting).”
- “The classes are too full so a child can’t be given individual attention. The ones who can sit and attend better can get some attention.”

Limited staffing and a lack of clarity in the fundamentals of SDI have a direct impact on services delivered and documented for students with disabilities in GISD. An interviewee shared that “data is discussed, but not really attached to anything so there isn’t an understanding of how to shift that data.” Limited data on service provision was available for analysis as part of this review. Narrative data from participants revealed potential gaps in service provision as outlined in a student’s IEP and what occurs in practice:

- “The issue right now is that I have students for whom I need to know what the teacher is working on with them. Half the time my students are not getting pull-out minutes or the supports that they need.”
- “Last year a few of us went up to top administration with documentation on students that were not being served. The top administrator told our supervisor to get it taken care of. I wish we didn’t have to go above our bosses’ heads.”
- “In one school, it’s very academically focused. It’s hard for students with IEPs. They are supposed to be able to ‘make it’ in science and social studies classes, but reading is too hard, and kids get discouraged.”

<sup>82</sup> Additional information about staffing can be found subsequent sections.

- “What the special educator is teaching in their classroom doesn’t reflect what we are teaching. The behavior special education students are getting support for instruction in addition to the behavior supports and one may overlap with the others.”
- “Heterogeneous grouping is not benefitting students. They would be more successful (grouping) students on ability levels- having more spectrum levels and having a teacher that is a fit for those types of students.”

## ***Accommodations and Modifications***

The ARD Committee determines the accommodations and/or modifications that are necessary for a student to receive FAPE. All teachers, general and special education, are required to follow the ARD committee decisions. Failure to provide student services, including accommodations or modifications determined by the ARD/IEP Committee, results in a student being denied FAPE.

Curricular adaptations are changes permissible in educational environments which allow the student equal opportunity to obtain access, results, benefits, and levels of achievement. These adaptations consist of both accommodations and/or modifications.

**Accommodations** refer to the actual teaching supports and services that the student may require to successfully demonstrate learning<sup>83</sup>.

Accommodations should not change expectations to the grade-level curriculum. Modifications are practices and procedures that change the nature of the task or target skill.

**Modifications** are defined as a change to the general education curriculum or other material being taught. The teaching strategies are modified so the material is presented differently and/or the expectations of what the student will master are changed. Modifications must be clearly documented in the IEP.”<sup>84</sup>

During interviews and focus groups, GISD staff shared that a series of instructional videos featuring examples of classroom accommodations and modifications in practice, and highlighting the differences between the two, would be tremendously helpful. It was reported that there, at times, can be a breakdown between elementary and middle schools when ARD teams are drafting accommodations and modifications. Specifically, focus group and interview respondents recommended that consideration be given to the flexibility and implementation of accommodations and modifications included on the IEP when a student is transitioning from elementary to secondary programming.

## ***Assistive Technology (AT) and Augmentative & Alternative Communication (AAC)***

In IDEA (2004), assistive technology (AT) was defined as “any item, piece of equipment or product system, whether acquired commercially off the shelf, modified, or customized, that is used to increase, maintain, or improve the functional capabilities of children with disabilities.”<sup>85</sup> In addition, IDEA (2004) defines an assistive technology service as “any service that directly assists a child with a disability in the selection, acquisition, and use of an assistive technology device. The term includes:

- “The evaluation of the needs of a child with a disability, including a functional evaluation of the child in the child’s customary environment;
- Purchasing, leasing, or otherwise providing for the acquisition of assistive technology devices for children with disabilities;

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<sup>83</sup> “Understanding Accommodations”, IRIS Center  
<https://iris.peabody.vanderbilt.edu/micro-credential/micro-accommodations/p01/>

<sup>84</sup> “Understanding Accommodations”, IRIS Center  
<https://iris.peabody.vanderbilt.edu/micro-credential/micro-accommodations/p01/>

<sup>85</sup> IDEA Regulation 20 U.S.C. 1401(1)  
<https://sites.ed.gov/idea/statute-chapter-33/subchapter-i/1401/9>

- Selecting, designing, fitting, customizing, adapting, applying, retaining, repairing, or replacing assistive technology devices;
- Coordinating and using other therapies, interventions, or services with assistive technology devices, such as those associated with existing education and rehabilitation plans and programs;
- Training or technical assistance for a child with a disability or, if appropriate, that child's family; and
- Training or technical assistance for professionals (including individuals or rehabilitation services), employers, or other individuals who provide services to employ, or are otherwise substantially involved in the major life functions of, children with disabilities."<sup>86</sup>

Based on information gathered from interviews and focus groups the use of assistive technology seems to be inconsistent. There are two full-time Assistive Technology and Augmentative AC specialists in GISD responsible for completing all evaluations. Staff have access to an AT lending library. One participant shared that Speech Language Pathologists are no longer able to use iPads to determine if they are an appropriate device for students. Another interviewee shared that they have written to companies and have acquired expensive communication programs for Apple devices, and teachers cannot use that technology with student devices. Some respondents share that they spend up to \$30 per month on materials and subscriptions to support AT/AAC for students. Lastly, there was mixed feedback regarding how AT/AAC evaluations are conducted and how to secure communication systems for students who may benefit from this service.

### **Related Services**

Related Service Providers are a key component to supporting students with disabilities across all educational settings. As part of this comprehensive review, Related Service Providers participated in focus groups. The utilization of Related Service Providers across campuses and throughout GISD emerged as a key theme from the narrative data analysis.

Consistency in standard practices and how services are rendered is a priority to ensure equitable access for students receiving related services. Caseloads across and within provider groups, based upon anecdotal evidence, are highly variable. For example, a Speech Language Pathologist may have an elementary and secondary caseload primarily providing pull-out services. Another Speech Pathologist may be exclusively completing assessments and not providing any direct service. One participant shared that the "majority of the high school services are working with English teachers and collaborating in hallways." While it is expected to have variability within a discipline, it is a challenge to assess a Related Service Provider group's effectiveness when the differences are extreme. This variability also extends to data gathering processes for progress monitoring.

Other Related Service Providers, Occupational and Physical Therapists, and Vision Specialists, shared similar sentiments about inconsistency in programming and practices:

- "We need to address programming. There aren't enough levels between general education and ALE programs."
- "How students are served can be night and day between schools. Students need to be better grouped."
- "ALE students need functional life skills, not just to learn about George Washington in an inclusion class."
- "We need to better prepare kids for life and life skills, not just how to use a calculator."
- "Some students in life skills support are not a good fit. They are kind of just passed on rather than creating meaningful access to grade-level content."

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<sup>86</sup> IDEA Regulation, 20 U.S.C. 1401(2)  
<https://sites.ed.gov/idea/statute-chapter-33/subchapter-i/1401/9>

Related Service Providers perceive themselves as a cohesive group working collaboratively to support students as a unit. This is positive as their collective talents can be and are being harnessed to engage students with disabilities in GISD despite the programming and practice differences. There remains one Related Service Provider group whose efforts can be better utilized by GISD Special Education leadership, the Licensed Specialist School Psychologists (LSSPs).

Currently, LSSPs are acting in the evaluation capacity only. Per the focus group respondents, an LSSP primarily evaluates concerns related to Autism Spectrum Disorder (ASD) and does not provide any counseling services although they are licensed to do so. Their current scope of work is very limited, leading to “burnout because we are not able to make a difference in the lives of students.” One participant shared that the need for counseling supports is great; however, some students “have a recommendation from us for counseling. Counselors on the campuses don’t provide counseling to special education students. It just doesn’t get done a lot of times.” It is critical that GISD special education leadership restructure how best to utilize the talents of this Related Service Provider group to address the increasing mental health concerns for students.

### ***Transportation***

In Texas, the only students that a school district is required to provide transportation to are: 1) certain students receiving special education who would be unable to attend classes without special transportation services, and 2) certain students eligible under Section 504 of the Federal Rehabilitation Act who would be unable to attend classes without special transportation services.<sup>87</sup> Regulations further elaborate on the transportation services for eligible students with disabilities under the following guidance:

“A special-program student is a student with a disability who requires specialized transportation to access his or her academic program and certain other related services and who either:

“Meets all three of these requirements:

- The student is eligible under the TEC, §29.003, and Part B (Public Law 101-476) and Part H (Public Law 102-119) of the Individuals with Disabilities Education Act of 1990 and subsequent amendments
- The student would be unable to attend school and benefit from his or her special education program of instruction (including extended school year programs and community-based transitional life skills training) or developmental, corrective, and other supplementary supportive services without being provided special transportation as a necessary related service, as determined on an individual (case-by-case) basis; and
- The student has the requirement for special transportation properly documented by a duly authorized admission, review, and dismissal (ARD) committee in the student’s individualized education program (IEP) as a required related service to be provided by the district; or

Meets all three of these requirements:

- The student is eligible under Section 504 of the Federal Rehabilitation Act of 1973 and subsequent amendments;
- The student would be unable to attend school and benefit from his or her academic program of instruction without being provided special transportation as a necessary related service, as determined on an individual (case-by-case) basis; and

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<sup>87</sup> 34 Code of Federal Regulations, §104.33 and §300.101 (requirement to provide free appropriate public education); TEC, §12.109

- The student has the requirement for special transportation properly documented by the district in the student’s Section 504 accommodations plan.”<sup>88</sup>

The GISD transportation team has established a functional, efficient process for securing routes and rides for students with disabilities. The proverbial “clock” for processing transportation requests begins once all IEP paperwork is complete. The GISD staff reports a 3–5-day turnaround time for finalizing transportation when neighboring districts report a much longer time, 7-10 days. According to one participant, “if it’s just an address change where the route is the same, we can do 24-48 hours.” The district owns all buses and drivers, and transportation support staff are district employees. GISD has secured a third-party contract for taxi rides to support students requiring transportation as part of the McKinney-Vento Act. There are no active settlement agreements that include private transportation services. A participant did share an exception where “one instance of reimbursing for mileage because the student could not function on the bus. We don’t typically have any issues where a bus isn’t available. It’s been because of a student not being able to be on the bus behaviorally.”

Communicating transportation requests and changes has improved, as highlighted by focus group and interview participants. GISD transportation staff has made a concerted effort to avoid rides longer than one hour for students, although there is no formal guidance per participant report. Special education staff, particularly Diagnosticians and Transportation team members, utilize emails and phone calls to regularly provide updates. Parents typically reach out for transportation changes or questions and can be rerouted to speak directly with the Diagnostician. One participant stated, “between the leadership in special education and our special needs routing, the big thing is to keep up communication.” Transportation safety requests, such as safety vests and belts, must be included on a student’s IEP in order to be included on the bus. All GISD staff responsible for transportation requests must document them in eSPED.

The GISD Transportation team takes great pride in the service they provide to students with disabilities and their families. Leadership has reported that they would appreciate additional training for transportation staff as many of the bus aides may have limited experience supporting students with disabilities. As reported by an interviewee, “between our Special Education Department and Transportation, I think we are on a good path to providing excellent service for our students.”

## Positive Behavior Intervention and Supports

With the passage of the IDEA (2004) and its amendments, Congress recognized schools must be inclusive of all students and use evidence-based approaches to support the behavioral needs of students with disabilities. According to the Office of Special Education Technical Assistance Center on Positive Behavioral Interventions and Supports under the U.S. Department of Education, Positive Behavioral Interventions and Supports (PBIS) is the only approach specifically mentioned in the law for preventing exclusion, improving educational outcomes, and addressing the behavior support needs of students with disabilities. In addition to PBIS, the law states education for students with disabilities can be more effective when schools:<sup>89</sup>

- Provide incentives for whole-school approaches;
- Implement scientifically based early reading programs; and

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<sup>88</sup> Specialized transportation is transportation that is provided separate from regular program students. Texas Education Code TEC, §29.001–§29.005 and §48.151 (b)(2) and (g)

<sup>89</sup> OSEP Technical Assistance Center on Positive Behavioral Interventions and Supports (2021). Positive Behavioral Interventions & Supports. See: <https://www.pbis.org/topics/disability>.

- Use early intervention services to stop labeling students as ‘disabled’ in order to address their learning and behavioral needs.<sup>90</sup>

Senate Bill 1196 of the 77<sup>th</sup> Texas Legislature required the TEA to develop rules related to training on the use of restraint and time-out for students with disabilities.<sup>91</sup> The Texas Behavior Support Initiative (TBSI) is a state-level training that meets the requirements mandated by Texas Education Code §37.0021 and Texas Administrative Code §89.1053. TBSI provides free online training for TEA educators and staff.<sup>92</sup> The purpose of this training is to provide foundational knowledge for the use of positive behavior interventions and supports for all students, including students with disabilities.<sup>93</sup> While the TBSI training meets legislative requirements related to procedures for the use of restraint and time-out, it also provides a framework for sharing a wide range of foundational-level behavior strategies and prevention-based schoolwide, classroom, and individual interventions.<sup>94</sup>

The GISD Special Education Handbook has a section highlighting the requirements of Texas Education Code §37.0021 and Texas Administrative Code §89.1053, the Texas Behavior Support Initiative. In addition, GISD Special Education Handbook outlines staff expectations at the school-house and training requirements. Below is an excerpt from the GISD Special Education Handbook outlining the Core Team Requirements of Senate Bill 1196:

#### **Core Team Requirements of Senate Bill 1196**

*Each campus must have a Core Team which includes an administrator and general and special educators. Each Core Team member must complete the requirements for the Texas Behavior Support Initiative (TBSI) and the Nonviolent Crisis Intervention (NVCI). Additionally, all teachers and para-educators in self-contained classes must be trained in TBSI and NVCI. Senate Bill 1196 requires that persons who are called upon to use restraint or time-out without prior training must attend NVCI training within 30 school days.*

#### **Who are the required campus level trainees?**

*Campus administrator or designees; including:*

- *General and special education personnel likely to use restraint; and*
- *General and special education personnel who implement time-out based on requirements established in the student’s IEP.*

#### **Reporting CORE Team Members to Special Education**

*At the beginning of each school year all campus principals will access the CORE Team Registration link in the Special Education department on the intranet. Once this online form is filled out and all required and additional members are listed, they must register for NVCI training immediately. The trainings are on Oracle. The first training is a full day. Every year thereafter trainees must receive a half-day refresher course.*

GISD leadership and staff provided narrative feedback during focus groups and interviews regarding training and the implementation of TBSI. They reported the following:

- “There is no training in behavior or how to support the behaviors they are seeing.”

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<sup>90</sup>OSEP Technical Assistance Center on Positive Behavioral Interventions and Supports (2021). Positive Behavioral Interventions & Supports. See: <https://www.pbis.org/topics/disability>.

<sup>91</sup> Texas Administrative Code, Texas Behavior Support Initiative [https://www.esc14.net/page/ctl\\_beh\\_tbsi](https://www.esc14.net/page/ctl_beh_tbsi)

<sup>92</sup> Tiered Interventions Using Evidence-Based Research, <https://tier.tea.texas.gov/TBSI>

<sup>93</sup> Tiered Interventions Using Evidence-Based Research, <https://tier.tea.texas.gov/TBSI>

<sup>94</sup> Tiered Interventions Using Evidence-Based Research, <https://tier.tea.texas.gov/TBSI>

- “On the training for behaviors, teachers don’t know what to do with these kids. I saw two cases where students were put in ALE because resource teachers can’t deal with behaviors. It’s not that students can’t learn in resource environment, it’s too much for teacher and affects other students. There has to be some kind of training and we need to know how to manage.”
- “Training & development is very much lacking. What the training looks like for staff is not there. For example, (a staff member was) using a clown mask to scare a student. A teacher was dragging a student through the school, “mopping” the floor with them. Another staff member was pushing a student up against a wall and another staff member broke a student’s arm.”
- “Texas passed a law that prevented suspensions from K-2. When that happened, principals didn’t know what to do and recourse to follow for behavior.”
- “When presented with numerous lawsuits—in PAC—a child hurt a teacher and was asked to leave. The principal asked for him to come back but was not using crisis intervention protocol. People just did what they wanted.”

There appears to be a disconnect between the TBSI content being developed, delivered, and implemented within the schoolhouse and in the classroom.

### ***Tiered Positive Behavior Support Model for Students with Disabilities***

Children and youth with disabilities benefit from FAPE designed to meet their unique needs. At the same time, students with disabilities are served best when their general and specialized supports are integrated into the larger school-wide framework. The Center on Positive Behavioral Intervention Supports (PBIS) promotes a three-tiered MTSS style approach to social behavior. Below is an excerpt from their guidance<sup>95</sup>:

Tier 1: Students with disabilities benefit from Tier 1 support by including the school-wide language for expectations in their IEP. Adopting these expectations and applying them during specialized instruction is important, too. School personnel teach students behavioral expectations by using the core PBIS lessons and utilizing the school-wide acknowledgment system for appropriate behaviors. Within classrooms, students with and without disabilities benefit from frequent opportunities to respond, positive acknowledgments, and reminders such as prompts and pre-corrections.

Tier 2: Targeted interventions at this tier are more intensive than those given at the universal tier 1 level. Students may receive Tier 2 targeted interventions in addition to Tier 1 supports. Students with disabilities may benefit from Tier 2 support the same as any other student in the school. However, Tier 2 supports should supplement and not reduce or replace services outlined in the student’s IEP.

Tier 3: For those few students who engage in chronic, severe behaviors and who have not responded to Tier 1 and Tier 2 supports, Tier 3 interventions may be appropriate. The Tier 3 framework includes the design of Behavior Intervention Plans (BIP) with interventions driven by Functional Behavioral Assessments (FBA). Teams may apply a person-centered or wraparound process. These processes place student and family needs at the center of the support provided for students with complex needs. Students with disabilities access Tier 3 interventions in two ways: (1) As part of typical school practices or (2) as required through the IEP.<sup>96</sup>

GISD is executing a PBIS-Foundations 3-year implementation model. The programmatic roll-out began in special education classrooms, including self-contained programs, that focus on supporting students with disabilities who exhibit challenging behavior. One focus group participant shared that, “the 3-year training

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<sup>95</sup> <https://www.pbis.org/pbis/tiered-framework>

<sup>96</sup> OSEP Technical Assistance Center on Positive Behavioral Interventions and Supports (2021). Positive Behavioral Interventions & Supports. See: <https://www.pbis.org/topics/disability>.

for coaches placed on general education campuses needs help. Some principals have continued to implement, and for others, it has faded.”

To support the implementation of TBSI, GISD leadership rolled out a new, digital platform, Review 360. Review 360 is the district’s web-based behavior improvement system that provides data-driven training, recommendations, and resources to help improve student behavior and academic success. Through Review 360, schools can track and monitor in-school and out-of-school suspensions, including monitoring the 10-day rule.

### ***Protocols for Conducting and Implementing Functional Behavioral Assessments and Behavioral Intervention Plans***

Under IDEA (2004), if behavior impedes a student’s learning the IEP team must consider the use of positive behavioral interventions and supports to address that behavior. In such circumstances, a Functional Behavior Assessment (FBA) is used to assess the targeted behavior, antecedent circumstances that trigger the behavior, and helps the team to design the Behavior Intervention Plan (BIP). An FBA and BIP must be in place for students with IEPs who are suspended for more than ten days for behavior that is manifested by their disability.

The following items are typically included in a BIP:

- Target behavior(s);
- Documentation of prior interventions and student response;
- Description of positive supports/interventions to be implemented, including the conditions under which the supports/interventions will be implemented;
- Procedures for data collection to evaluate the effectiveness of the interventions;
- Conditions under which the supports/interventions will be changed;
- Conditions under which the supports/interventions will be terminated; and
- Parental involvement.

GISD has developed extensive protocols for conducting FBAs and BIPs to support students with disabilities exhibiting challenging behavior. The GISD Special Education Handbook outlines eSPED procedures as well as guidance for specific behavioral concerns and protocols within program-specific documents.

In the GISD interviews and focus groups, staff were asked for feedback on “what is working” for PBIS and TBSI implementation. Several key team members shared the following:

- “The good ones (campuses) are really good with providing structure, visual cues, and consistent routines. The teachers are dedicated.”
- “One campus doing PBIS/TBSI follows the same structure but based on behavior. When a student needs support to move from T1 to T2, the ARD team follows the process and problem solves to help student before proceeding to the next step.”
- “Our need is focusing on whole child and SEL. SEL can come through counseling. It’s how your campus wants to take it on. We’ve been proactive and our counselor is great! Yoga in classrooms, looking at whole child.”

The narrative data supports the dichotomy between some campuses fully embracing PBIS and TBSI while others are struggling to implement its principles. This disconnect may be attributed to cultural mindsets around challenging behavior within GISD that are slowly shifting.

### ***Shifting the Culture Around Challenging Behavior***

According to data gathered from interviews and focus groups, as well as information gathered during file review focus groups, GISD staff would benefit from an increased focus on training and mindset shifts to

support students with behavioral manifestations of their disabilities. One respondent shared that “right now our culture and mindset is one of exclusion.” Another study respondent shared disturbing feedback regarding how students with significant challenging behavior have been disciplined in GISD:

“The security department modifies content for protocols for students with more severe disabilities, specifically lockdown and lockout procedures. They train students and teachers to ‘stop the bleed’ using a tourniquet. In that center, the principal had padded cells and locked kids in. That’s illegal—you cannot entrap students. When I’m walking in, they (the school team) said you don’t understand. I called maintenance to remove door locks. You are not handling the kids appropriately. When I went back, the door locks were replaced. That principal is no longer here. We hired someone else, and they did what they could and went back.”

While this isolated incident is not wholly representative of the district, it does highlight that significant cultural and mind shifts need to occur. Another approach for GISD to consider when addressing challenging behavior is restorative justice. Some interviewees have shared that those conversations have begun. It would be a timely consideration as restorative justice practices are in sharp contrast to institutionalization-type practices of seclusion and restraint. Lastly, GISD leadership needs to expand upon the number and scope of behavioral specialists within the district. According to interview and focus group feedback, there are approximately four behavioral specialists to support over 53,000 students in GISD. “Ideally, we would be going from four specialists to 20 specialists to support students and teachers. There is a huge cultural shift that needs to be made.” Embedding highly trained experts within campuses throughout the district with strong support networks may be the much-needed catalyst to support change.

### ***Out-of-School Suspensions: All Students***

The use of out-of-school suspensions (OSSs) because of disciplinary infractions results in the removal of students from instruction. Based on data that GISD provided, the district suspended a relatively small number of students during the 2019-20 school year. Of all GISD students, 291 (0.54%) were suspended for at least one day. Of all suspended students, 252 or (86.6%) were students identified as eligible for special education. Furthermore, 4.67% of all identified students were suspended compared to 0.08% of students not identified, making identified students 58 times more likely than non-identified students to receive an OSS.

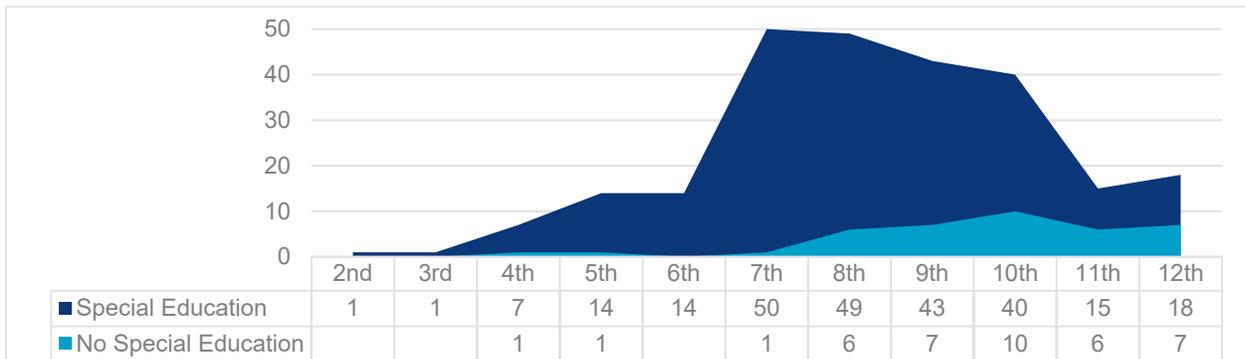
### ***Suspensions by Days and Special Education Status***

All but five students were suspended for more than ten days. Of 4 of these suspensions, two were suspended for 12 days, and one each for 13 and 18 days. The single non-identified student was suspended for 11 days.

### ***Suspensions by Grade and Special Education Status***

Of the 252 identified students, 182 (72%) were in grades 7 through 10. Of the 39 students who did not receive special education, 26% were in grade 10, and 92% were in grades 8 through 12.

**Exhibit 58. Number of Students With/Without Special Education by Grade**

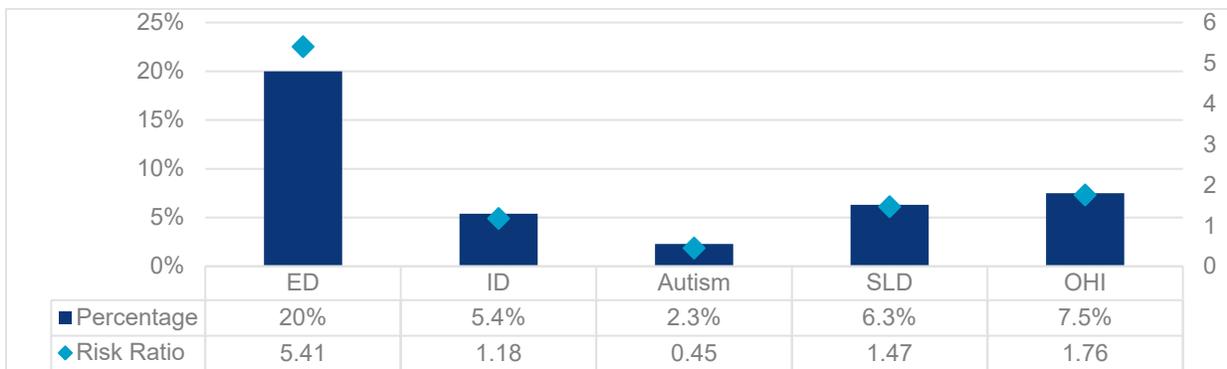


### **Suspensions by Disability Category**

Five disability areas had at least ten students who were suspended at least ten days: emotional disability (ED), intellectual disability (ID), autism, specific learning disability (SLD), and other health impairment (OHI). The exhibit below shows for each of these five disabilities suspension rates of all identified students with the associated disability and risk ratios.

ED had the highest suspension rate (20%), while autism had the lowest (2.3%). The other three rates ranged between 6.3% and 5.4%. ED students were 5.41 times more likely than students with all other disabilities to be suspended. Of the four GISD students with IEPs suspended for more than ten days, three were qualified as ED.

**Exhibit 59. Suspension Rates and Risk Ratios by Disability Category**

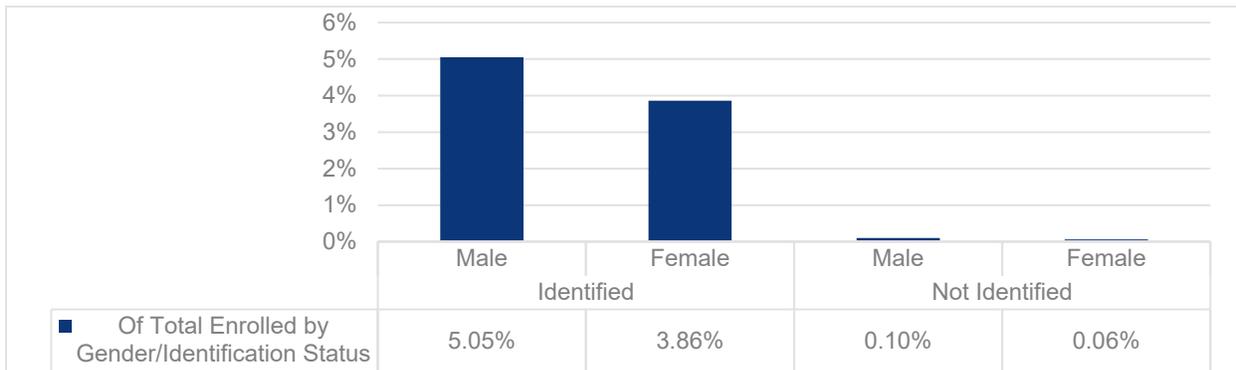


### **Suspensions by Gender and Special Education Status**

#### **Enrollment Suspension Rates by Special Education Status and Gender**

Much larger percentages of males and females identified for special education were suspended at least one day compared to nonidentified students. Of all enrolled identified males, 5.05% were suspended compared to 0.10% of all nonidentified males. Of all enrolled identified females, 3.86% were suspended compared to 0.06% of all nonidentified females.

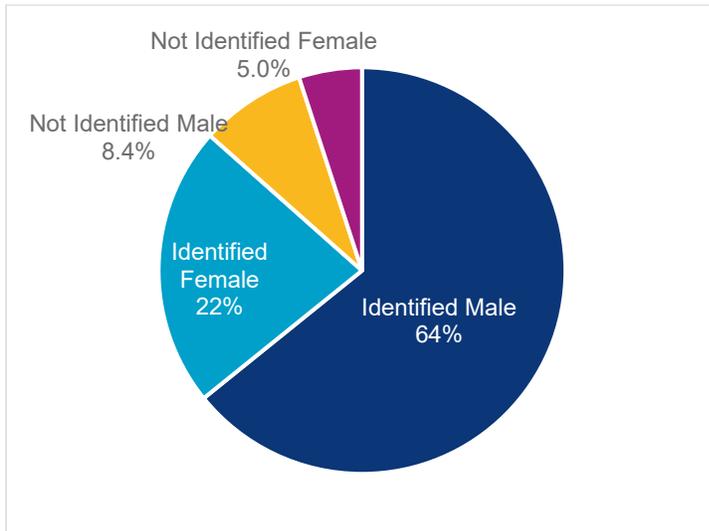
**Exhibit 60. Suspension Rate of All Enrolled by Gender and Special Education Status**



**Identified and Not Identified Student Suspension Rates by Gender**

Of all suspensions, 64% were received by males identified for special education, 23% by identified females, 8.4% by males not identified for special education, and 5.0% by females not identified.

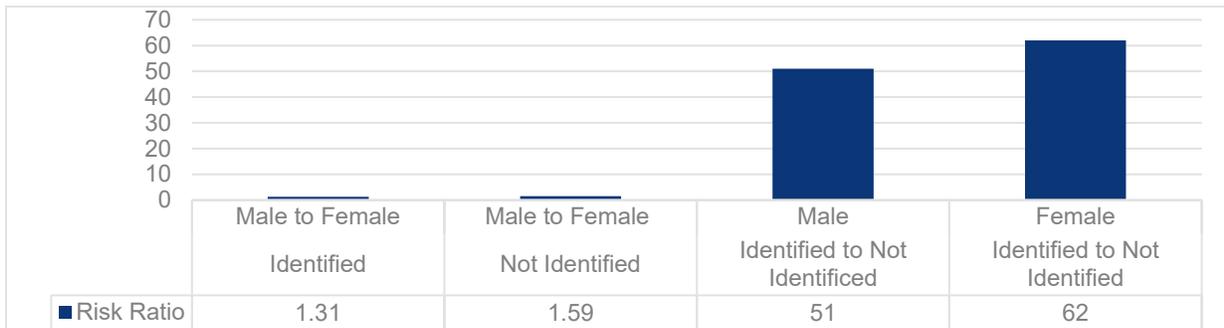
**Exhibit 61. Percent of All OSSs by Gender and IEP Status**



**Likelihood of OSS by Special Education Status and Gender**

For all students identified for special education, males were 1.31 times more likely than females to receive 1+ days of OSS, and for students without IEPs, males are 1.59 times more likely than females to be suspended. However, the likelihood changes significantly when comparing students with and without IEPs by gender. Males with IEPs are 51 times more likely than males without IEPs to be suspended, while females with IEPs are 62 times more likely than females without IEPs to be suspended.

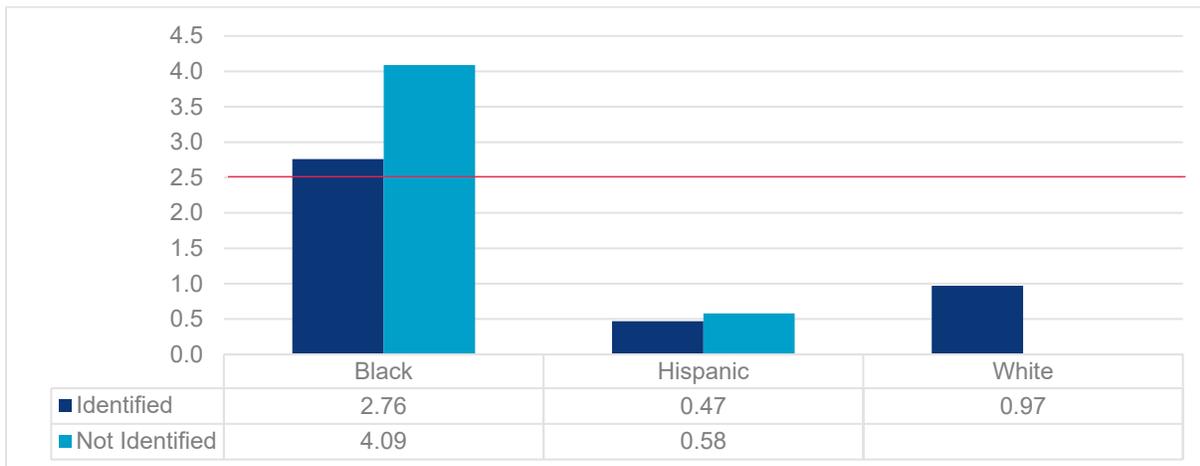
**Exhibit 62. Risk Ratios by Identification Status and by Gender**



***Risk Ratios by Special Education Status and Race/Ethnicity***

TEA monitors school districts’ significant disproportionality for identified students by race/ethnicity who received OSSs for ten days or less and for more than ten days. The exhibit below compares risk ratios by special education status and race/ethnicity students with at least one day of OSSs. Black students identified for special education were 2.76 times more likely than non-Black identified students to be suspended. With a risk ratio of 4.09, the likelihood was higher for Black students not identified for special education to be suspended compared to identified Black students (2.76 risk ratio). It is important to note that all four identified students who were suspended for more than ten days were Black. No other racial/ethnic group had a risk ratio higher than 0.97 for either identified or not identified students.

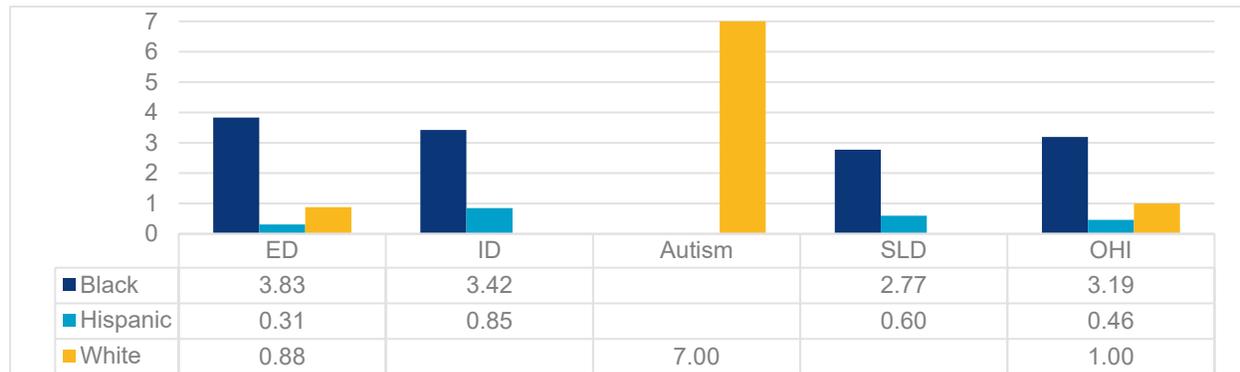
**Exhibit 63. Suspension Risk Ratios based on Special Education Status and Race/Ethnicity**



***Suspensions by Disability Categories and Race/Ethnicity***

The exhibit below shows risk ratios by race/ethnicity and five disability categories TEA monitors for suspensions of one day or more. Black students were more likely than non-Black students to be suspended in four disability areas: emotional disturbance (3.83 risk ratio), intellectual disability (3.42 risk ratio), specific learning disability (2.77 risk ratio), and other health impairment (3.19 risk ratio). White students with autism were 7.0 times more likely than non-White students to be suspended. Of the four identified students suspended for more than ten days, three Black students were identified with ED and one with OHI.

**Exhibit 64. Suspension Risk Ratios by Disability and Race/Ethnicity**



### ***In-School Suspensions***

In 2020 and 2019, TEA found that GISD’s Black students identified for special education were 2.9 times more likely than non-Black identified students to receive an in-school suspension for more than ten days.<sup>97</sup> This risk ratio was higher than the state’s maximum threshold of 2.5. For the state’s reasonable progress criteria to apply to the year three risk ratio for this indicator, the figure must sufficiently decrease to show a rate of progress needed for the risk ratio to fall below 2.5 in year four.<sup>98</sup>

### **Unexcused Absences: All Students**

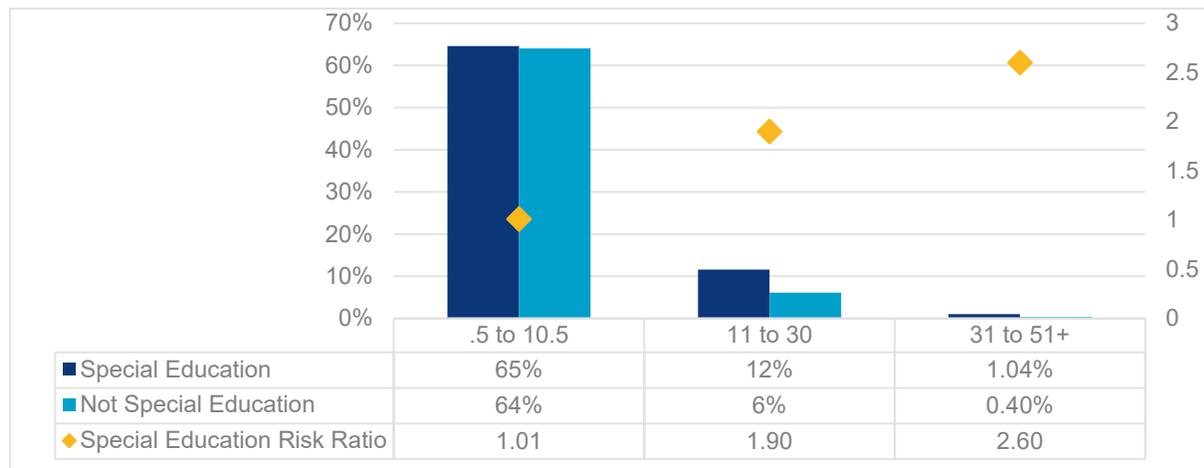
This section has information about unexcused absences, which like suspensions, restricts students’ receipt of instruction. Of all students absent at least one day, the composition of identified and not identified students were similar (77.2% and 70.5%, respectively.) The exhibit below compares identified and not identified groups by three ranges of days absent. Identified students were more likely than not identified students to be absent as the number of days absent increased.

- **0.5 to 10.5 Days.** Absence rates of identified and not identified students were about the same (65% to 64%, respectively). Identified students were as likely as those not identified to be absent for this range of days.
- **11 to 30 Days.** Of identified students, 12 percent were absent compared to 6 percent of those not identified. Identified students were 1.90 times more likely than those not identified to be absent for this range of days.
- **31 to 51+ Days.** Of identified students, 1.04 percent were absent compared to 0.40 percent of those not identified. Identified students were 2.60 times more likely than those not identified to be absent for this range of days.

<sup>97</sup> 2020 Results Driven Accountability report for GISD@ <https://tea.texas.gov/student-assessment/monitoring-and-interventions/rda/results-driven-accountability-data-and-reports>.

<sup>98</sup> Significant Disproportionality (SD) Regulation Crosswalk – Texas @ <https://tea.texas.gov/academics/special-student-populations/special-education/programs-and-services/significant-disproportionality>.

**Exhibit 65. Unexcused Absence Rates & Risk Ratios: Special Education Status by Day Ranges**



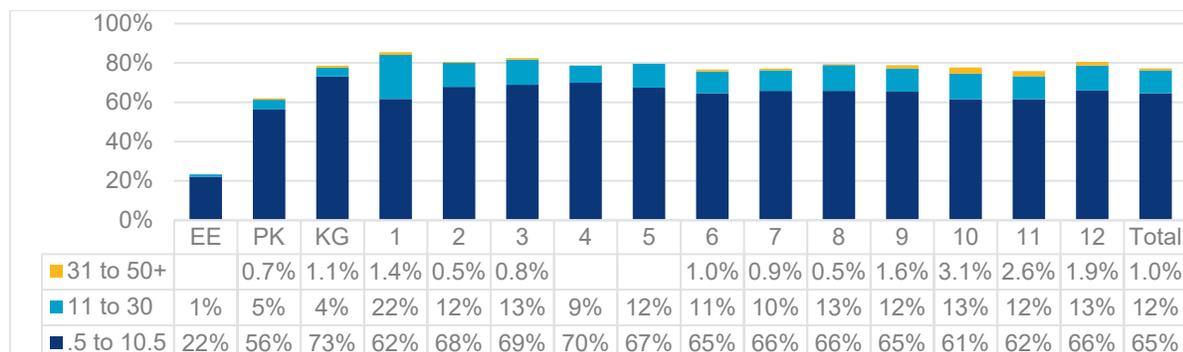
The remaining portion of this section provides more detailed information about special education absenteeism patterns by days absent, by grade and disability area, and by race/ethnicity.

**Unexcused Absences by Grade and Day Ranges**

Overall rates of students with one or more unexcused absences ranged from 23 percent [early education (EE)] to 85 percent (grade 1). Rates by absence day ranges and grade are described below.

- **0.5 to 10.5 Days.** Early grade absence rates were the smallest (22 percent for early education (EE) and 56% percent for prekindergarten (PK)). Rates from grades 1 to 12 ranged by nine percentage points from 61 percent (grade 10) to 70% (grade 4). The all-grade rate was 65 percent.
- **11 to 30 Days.** Early grade rates were also the smallest for this range of absent days (1% for early education, 5 percent for prekindergarten, and 4 percent for kindergarten). Rates then jumped to 22 percent at grade 1. Between grades 2 and 12, rates ranged by 3 points from 10 percent (grade 7) to 13 percent (grades 3, 8, 10, and 12). The all-grade rate was 12 percent.
- **31 to 50+ Days.** Grades 10 to 12 had the highest rates (3.1%, 2.6%, and 1.9%, respectively). For all other grades, absent rates were small and ranged from no students (early education and grades 4 and 5) to 1.6 percent (grade 9). The all-grade rate was 1.0 percent.

**Exhibit 66. Unexcused Absence Rates by Grade and Day Ranges**

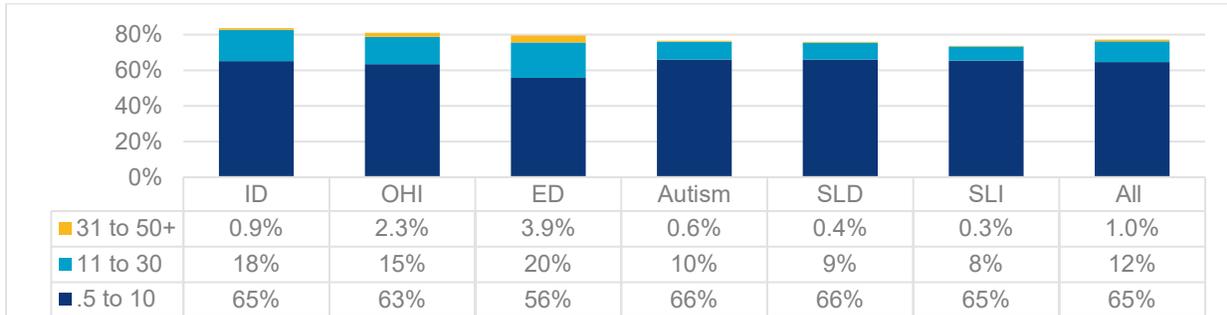


**Unexcused Absences by Disability Category and Day Ranges**

Overall rates of students with 1 or more unexcused absences by disability category ranged from 80 percent (emotional disability) to 74 percent (speech/language impairment). Rates by absent day ranges and disability areas are described below.

- **0.5 to 10.5 Days.** Rates ranged by 10 points, from 56 percent (emotional disturbance) to 66 percent (autism and specific learning disability). The all-grade rate was 65 percent.
- **11 to 30 Days.** Rates ranged by 12 points, from 8 percent (speech/language impairment) to 20 percent (emotional disturbance.) The all-grade rate was 12 percent.
- **31 to 50+ Days.** Rates ranged from 0.3% (speech/language impairment) to 2.3% (other health impairment) and 3.9 percent (autism). The all-grade rate was 1.0 percent.

**Exhibit 67. Unexcused Absence Rates by Disability Area**

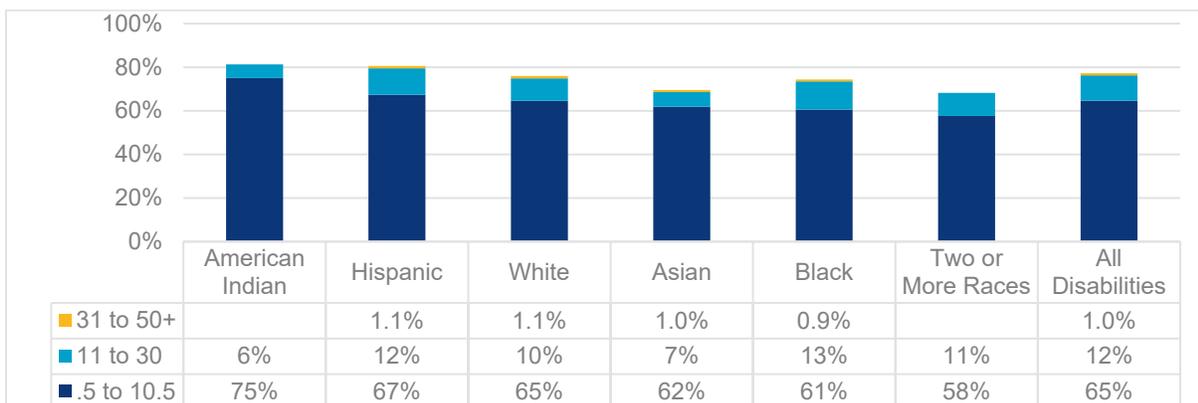


**Unexcused Absences by Race/Ethnicity and Day Ranges**

Overall, students with one or more unexcused absences by race/ethnicity ranged from 68 percent (students with two or more races) to 81 percent (American Indian and Hispanic). Rates by absent day ranges and race/ethnicity are described below.

- **0.5 to 10.5 Days.** Rates ranged by 17 percentage points, from 58 percent (students with two or more races) to 75 percent (American Indian). The all-grade rate was 65 percent.
- **11 to 30 Days.** Rates ranged by 7 points, from 6 percent (American Indian) to 13 percent (Black). The all-grade rate was 12 percent.
- **31 to 50+ Days.** Two racial/ethnic groups (American Indian and students with two or more races) had no students in this absenteeism day range. Rates for the other groups varied little, ranging from 0.9 percent (Black) to 1.1 percent (Hispanic and White). The all-group rate was 1.0 percent.

**Exhibit 68. Unexcused Absence Rates by Race/Ethnicity**



## Coordinated Early Childhood, School to School, and Post-Secondary Activities

### **Early Childhood**

GISD offers a comprehensive preschool program for young students with disabilities. As children eligible for Part C, Infants and Toddlers Services are found eligible for Part B 619 Early Childhood Special Education Services (ECSE), they are offered a placement within a GISD preschool program. Children enroll throughout the year as birthdates function as the catalyst to determine Part B 619 eligibility. GISD offers six inclusive preschool programs for young students with disabilities. GISD staff members can pay fees to enroll their students in these programs. It was noted by one focus group participant that “different models are used in the inclusion classroom – not a clear standard in the inclusion program.” In addition, children who require a self-contained placement can access services in one of two classrooms: 1) one half-day 3-year-old class and 2) one all-day 4-year-old class. All EC and ECSE are required to teach the general education curriculum; however, there were discrepancies noted regarding which curricula to implement.

During interviews and focus groups with staff, it was shared by some that the general education classrooms are moving to a full-day model, which will impact half-day 3-year-old students who may only attend in the morning or in the afternoon. A focus group participant shared that it “will be difficult to model, reteach, and practice,” and priority should be given to students with IEPs to attend all day. That will require GISD leadership to expand the number of classrooms potentially.

Anecdotally, GISD highlighted the increasing number of young children being identified as having autism spectrum disorder. Fifty-six percent of children ages 3 to 5 in GISD have been found eligible for special education and related services under the disability classification of Speech and Language Impairment. Thirty-one percent of children ages 3 to 5 were found eligible for services under the disability classification of autism spectrum disorder. That is a unique finding as TEA recognizes the disability category “Non-Categorical Early Childhood (NCEC),” which is akin to the IDEA (2004) determination of “Developmental Delay.” Texas defines NCEC as “for students aged 3-5 who have general delays in their physical, cognitive, communication, social, emotional, or adaptive development; and who, because of these delays, need special education and related services.”<sup>99</sup> The Texas Project First went on to clarify how Texas interprets the use of NCEC:

“It is often difficult to diagnose very young children. With early intervention and appropriate services, children may not need special education by the time they reach first grade. The “Non-Categorical Early Childhood” category allows preschoolers to benefit from special education and related services without being labeled with a specific disability. In Texas, a child between the ages of 3-5 may be described as ‘NCEC’ if he or she has been diagnosed as having one of the following:

- Intellectual Disability,
- Emotional Disturbance,
- Specific Learning Disability, or
- Autism.”

It is important that GISD leadership investigate why young children are being found eligible for services under specific disabilities rather than NCEC. That is relevant as disability classifications can inadvertently drive classroom placements which would explain the higher volume of young students with disabilities moving into self-contained placements in their Kindergarten year (140 students according to one study participant).

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<sup>99</sup> Texas Progress First- Disability Resources, <http://texasprojectfirst.org/node/124>

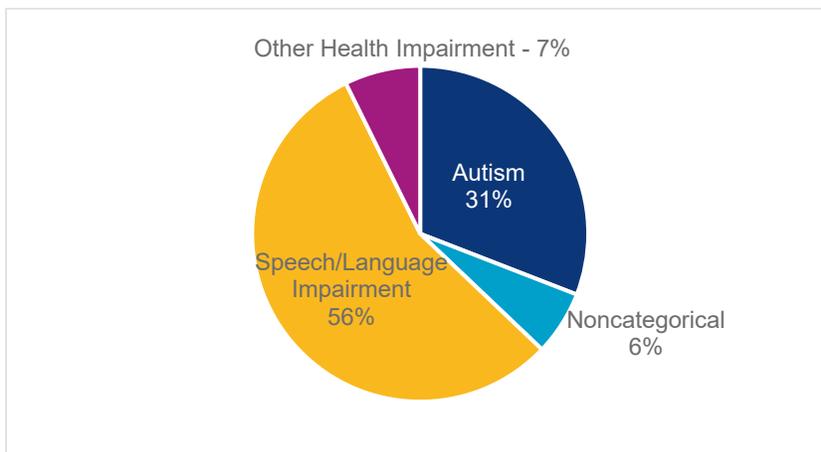
## Identification, Achievement & Placement: Children 3 to 5 Years Old

Most 3- to 5-year-olds with disabilities learn best when they attend preschools alongside their same-age peers without disabilities to the greatest extent possible<sup>100</sup>. These settings provide both language and behavioral models that assist in children’s development and help all children learn to be productively engaged with diverse peers. Studies have shown when children with disabilities are included in the general classroom setting, they demonstrate higher levels of social play, are more likely to initiate activities, and show substantial gains in key skills such as cognitive skills, motor skills, and self-help skills.<sup>101</sup> Participating in activities with typically developing peers allows young children with disabilities to learn through modeling, and this learning helps them prepare for the real world. Researchers have found that typically developing children in inclusive classrooms are better able to accept differences and are more likely to see their classmates achieving despite their disabilities<sup>102</sup>. They are also more aware of the needs of others. The importance of inclusive education is underscored by a federal requirement, which requires that the extent to which young children (three to five years of age) receive the majority of their services in regular early childhood programs, i.e., inclusively or in separate settings, be included as an SPP indicator. Texas public pre-kindergarten programs are available for 3- and 4-year-old children from low-income, dual-language, foster, or military families. These programs are based on space availability. Children identified as needing special education are entitled to a FAPE based on their IEPs. Children outside of these categories are eligible for any public tuition-based programs.<sup>103</sup>

### Identification by Disability

More than half (56%) of all children identified for special education had a speech/language impairment, and 31% had autism. The remaining categories comprised a total of 13 percent: noncategorical (6%)<sup>104</sup> and all other areas (7%). The “other” category included children with other health impairments, intellectual disabilities, visual impairments, and auditory impairments.

**Exhibit 69. Percent of Identified Children (Ages 3-5) by Disability Area**



<sup>100</sup> Book Chapter: How Do Children Benefit from Inclusion?. <http://archive.brookespublishing.com/documents/gupta-how-children-benefit-from-inclusion.pdf>

<sup>101</sup> Book Chapter: How Do Children Benefit from Inclusion?. <http://archive.brookespublishing.com/documents/gupta-how-children-benefit-from-inclusion.pdf>

<sup>102</sup> Book Chapter: How Do Children Benefit from Inclusion?. <http://archive.brookespublishing.com/documents/gupta-how-children-benefit-from-inclusion.pdf>

<sup>103</sup> TEA Guidance on Prekindergarten Tuition (website),

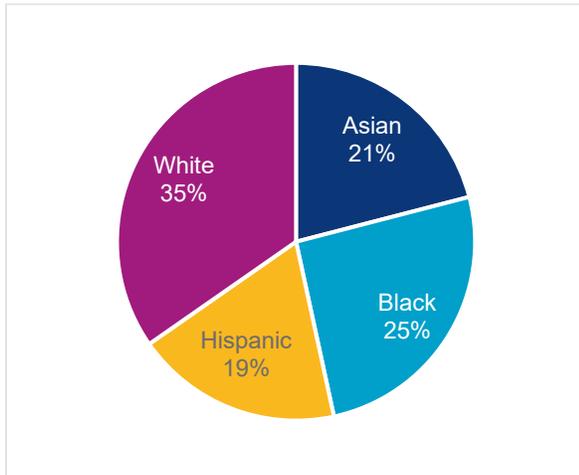
<https://tea.texas.gov/academics/early-childhood-education/prekindergarten-tuition>

<sup>104</sup> In Texas, a student between the ages of 3 and 5 who is evaluated as having an intellectual disability, an emotional disturbance, a learning disability, or autism may be described as noncategorical early childhood @ <https://childfindtx.tea.texas.gov/eval-disability-criteria.html>.

### Identification Composition by Race/Ethnicity

The Exhibit below shows the composition of all students identified for special education by category. In descending order, the special education racial/ethnic composition of White students was 35 percent, Black students were 25 percent, Asian students was 21 percent, and Hispanic students was 19 percent.

**Exhibit 70. Percent of Children with IEPs (Ages 3-5) by Race/Ethnicity Compared to Each Racial/Ethnic Group of Enrolled Children**



### Achievement Outcomes

SPP Indicator 7 relates to the achievement of young children with disabilities in three areas: A) appropriate behavior, B) acquisition and use of knowledge and skills, and C) positive social/emotional skills. In each of these three areas, calculations are made on the percentage of children in the following two areas: (1) children who substantially increased their skills and (2) children functioning within expectations. Summarized below are GISD's 2018-19 performance ratings for these two areas by each of the three categories (7A-C).<sup>105</sup>

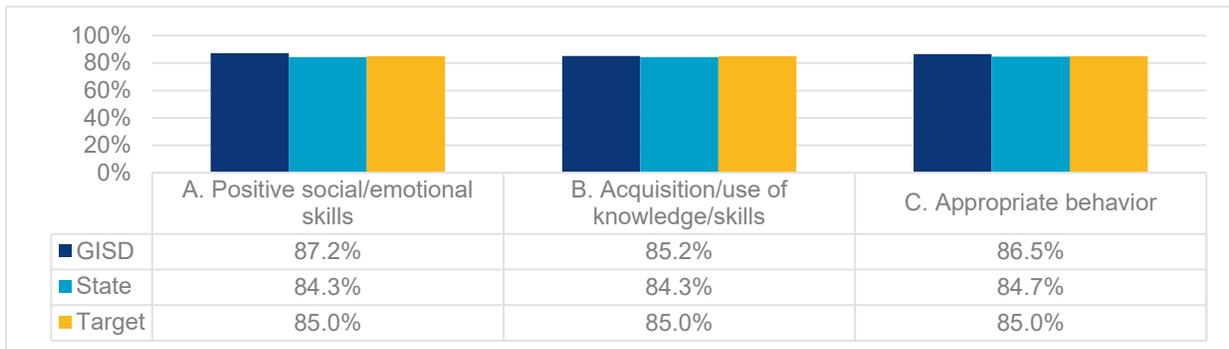
#### Substantially Increased Skills

The first set of indicators are for children who entered an EC program below developmental expectations for their age but who substantially increased developmentally by age six when they exited the program. In each of the three areas, the district's percentages of students who met standards exceeded both the state minimum target and state rate.

- a. **Positive Social/Emotional Skills.** 87.2 percent met standards, which was 2.2 percentage points above the state target, and 2.9 points above the state rate.
- b. **Acquisition/Use of Knowledge/Skills.** 85.2 percent met standards, which was 0.2 percentage points above the state target, and 0.9 points above the state rate.
- c. **Appropriate Behavior to Meet Needs.** 86.5 percent met standards, which was 1.5 percentage points above the state target and 1.8 points above the state rate.

<sup>105</sup> Data retrieved from State Performance Plan public reports: <https://tea.texas.gov/academics/special-student-populations/special-education/data-and-reports/state-performance-plan-indicators>

**Exhibit 71. Preschool Outcomes for Indicator 7A–C (Substantially Increased Skills)**

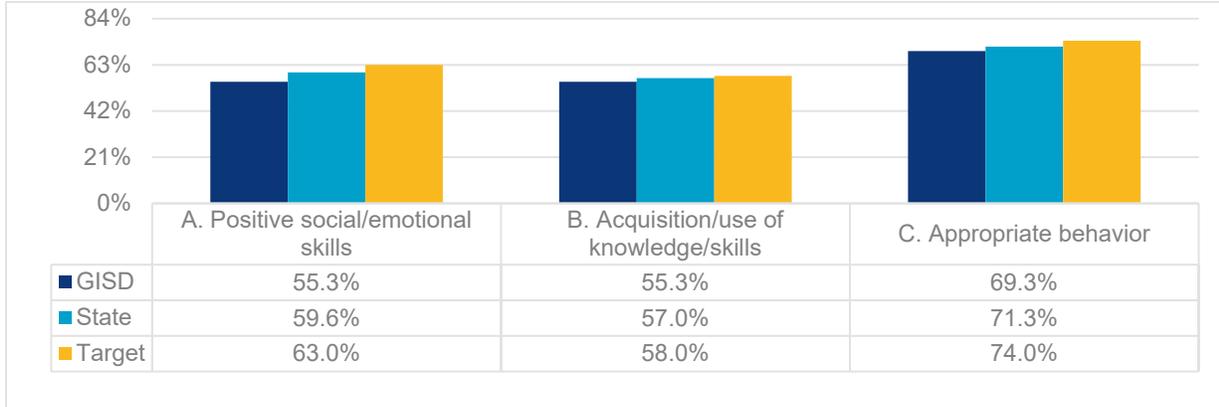


### Functioning Within Age Expectations

The second set of indicators is for children who were functioning within expectations by six years of age or had attained those expectations by the time they exited the program. In all three areas, GISD missed by a few points the state minimum target and state rate.

- Positive Social/Emotional Skills.** 55.3 percent met standards, which was 7.7 percentage points below the state target and 4.3 points below the state rate.
- Acquisition/Use of Knowledge/Skills.** 55.3 percent met standards, which was 2.7 percentage points below the state target and 1.7 points below the state rate.
- Appropriate Behavior to Meet Needs.** 69.3 percent met standards, which was 4.7 percentage points below the state target and 2.0 points below the state rate.

**Exhibit 72. Preschool Outcomes for Indicator 7A-C: Functioning Within Age Expectations**



### Educational Placements

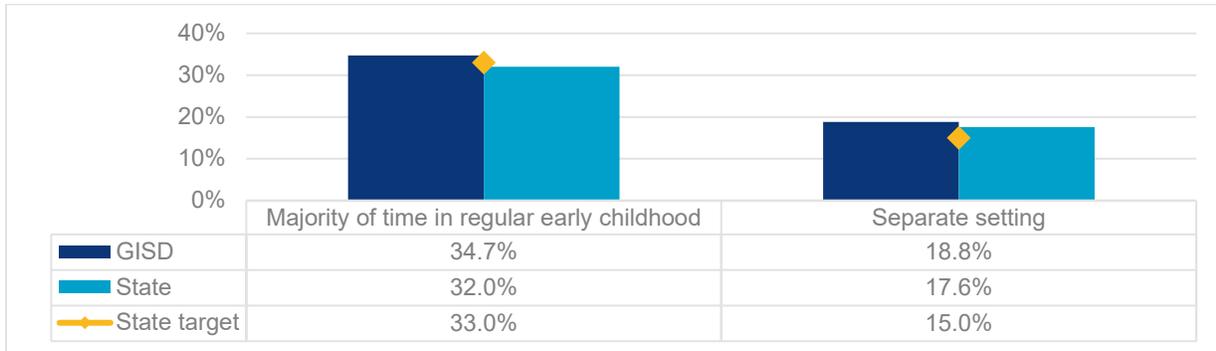
The Exhibit below shows the percentages of time GISD children were educated in regular EC classes for the majority of time and educated in special settings, which include separate classes, schools, and residential facilities.<sup>106</sup> These data are compared to state targets and state percentages.

- **Majority of time in regular early childhood program.** With 34.7 percent of children educated in this setting, GISD exceeded both the minimum state target of 33.0 percent and the state’s rate of 32.0 percent.

<sup>106</sup> Data retrieved from State Performance Plan public reports: <https://tea.texas.gov/academics/special-student-populations/special-education/data-and-reports/state-performance-plan-indicators>

- Separate setting.** With 18.8 percent of children educated in separate classes or separate schools, GISD exceeded both the state’s 15.0 percent maximum target and the 17.6 percent state rate. No students were educated in a residential school.

**Exhibit 73. Percentage of Students (Age 3-5) by Educational Setting for GISD & State SPP Targets**



### Post-Secondary Activities

The secondary transition planning process is a part of the student's IEP and helps students move from public school to post-graduation and adult life. Currently, IDEA (2004) requires transition services to be included as part of the IEP when a child turns 16. In Texas, this age is 14. Transition areas that must be addressed in the IEP include Employment, Postsecondary Education/ Training, and Independent Living (Home Living, Community Participation, and Recreation/Leisure).

GISD has many supports and programs in place to support students with disabilities in their post-secondary planning.

### Career and Technical Education (CTE) Classes

CTE courses are organized into thirteen career clusters,<sup>107</sup> providing students an introduction to specific career areas and options for further education or immediate employment. These programs offer students the opportunity to earn industry certifications and college credit while in high school. All students in GISD have access to CTE courses. Classes start in 7<sup>th</sup> grade and are available through 12<sup>th</sup> grade; however, there are some programs, like career exploration and robotics, that are provided at the elementary school level.

Within the thirteen clusters, there are a variety of programs of study with special options available at some of the magnet schools. Many of those programs are offered through the Gilbreath-Reed Career and Technical Center (GRTCT), a specialized CTE learning facility where students can attend as part of their school schedule. GRTCT is available to any student. Every course offered provides dual high school and college credit. By participating in one of the CTE course pathways, students can have the ability to participate in mentorships, internships, and practicums.

Counselors meet with each student to discuss CTE options. The district made video clips of each offering so students can view the possibilities. They have also created roadmap documents that show pathways and outcomes for each course and pathways for each campus and program. Various CTE programs are offered at each campus. If a student prefers a program not offered at their home school, they can choose the school that does offer it and the district provides transportation. There are also job fairs and mock-interview sessions and special events such as the Agricultural Show (“Ag Show”) that help support students with applying their CTE program to further post-secondary schooling or career. The Showmanship Club

<sup>107</sup> Cluster descriptions are available here: <https://www.garlandisd.net/content/career-technical-education-cte>

supports the inclusion of students in the ALE program, in that they can work with a peer from their high school who is showing an animal.

According to focus group participants, the CTE Department aims to work strategically to support students with IEPs in CTE courses. They are providing training for teachers about how to identify student interest and ensuring these students are placed in courses corresponding to their interest. The department offers two to three special education sessions for training CTE teachers. Because many CTE teachers are not teachers by trade, they are learning how to teach. The sessions also focus on understanding the difference between accommodations and modifications and how to make it possible for each student to learn and grow and to access the CTE content. A liaison from the CTE Department works hand in hand with the special education Transition Coordinators on staff development, along with other special education related items.

### **Universal Transition Supports**

GISD provides universal transition supports to students with disabilities starting at age 14. According to focus group participants, one goal of the district is to create ways for students to become active members of their IEP meetings. They want to move toward student-led IEP meetings on a more consistent basis, starting as early as elementary school. Some campuses already adopted this as the norm, while others are still working on it. The district has developed worksheets for younger students to present at their IEP meetings and are providing training for staff so they can better support high school students with providing input on the development of their IEPs. One participant mentioned a best practice she follows is to ensure all her students have copies of their accommodations by 11th grade so that they can advocate for themselves. They also work with students to reduce the number of accommodations they have on their IEPs as high school progresses. GISD uses the "I Am Determined" resources to help students build self-advocacy skills.

According to focus group participants, counselors play a substantial role in supporting all high school students, including those with disabilities, with their scheduling, with career assessments to identify career options, and with identifying potential CTE courses. They meet with each incoming 9<sup>th</sup> grader to create the student's four-year plan, which includes the courses he/she will be taking for graduation. This plan is aligned to the student's IEP. Further, GISD offers transition nights, and the district has seen an increase in participation in them thanks to mass emails announcing the sessions to families of students with disabilities. This information is also sent to campuses so that teachers can also distribute it. The district also has a dyslexia symposium to help students understand what resources are available for them at the college level.

### **Targeted Transition Supports**

GISD offers three specific courses for students with disabilities in high school.

#### *Vocational Adjustment Class (12th grade plus)*

The vocational adjustment class provides special education support to students who are placed on a job with regularly scheduled direct involvement by special education personnel in the implementation of the student's IEP. Students may also receive classroom instruction in job readiness and independent living skills in addition to general academic work. This program shall be used in conjunction with the student's transition service needs and only after Career and Technical Education (CTE) classes have been considered and determined inappropriate for the student.

#### *Transition Learning Center (TLC) (12th grade plus)*

The GISD TLC is a special education program designed to support inclusive practices, age-appropriate settings, community integration activities, and opportunities for competitive/supported employment. Students entering the TLC will have completed the district's minimum credit requirements for graduation, but the ARD/IEP Committee has determined a continued need for special education services leading to

competitive/supported employment. The student's parents must be willing to support employment initiatives, non-paid internships, volunteerism, and marketable skills training. Preparing for competitive and supported employment will be the primary focus. The ultimate objective is for students to establish daily independent living routines that will be continued after leaving the TLC.

*Meeting And Catering Service (MACS) (12th grade plus)*

Meeting and Catering Services (MACS) is a GISD special education community-based vocational education training experience for high school students with significant disabilities. This program gives students the opportunity to learn a wide range of job skills in an actual work environment. A job coach facilitates hands-on job training that includes refreshment set-ups of conference rooms, operation of a small store selling convenience items, and a mobile beverage and snack service. The campus VAC, in collaboration with other campuses special education staff, makes referrals to MACS.

*Project SEARCH (12th grade plus)*

The Project SEARCH High School Transition Program is a unique, business-led, one-year school-to-work program that takes place entirely at the workplace. Total workplace immersion facilitates a seamless combination of classroom instruction, career exploration, and relevant job skills training through strategically designed internships.

The Project SEARCH High School Transition Program is an employer-based intervention for high school students with significant disabilities whose main goal is competitive employment. The program combines real-life work experience with training in employability and independent living skills. Individualized placement assistance is provided as an integral part of the program. The hallmark of this demand-side model is complete immersion in the workplace. The program also demonstrates a novel collaborative approach that brings the education system, employers, and rehabilitation services together in unique ways to create a productive and comprehensive transition experience for students.

Through a series of three targeted internships, the students acquire competitive, marketable and transferable skills to enable them to apply for a related position. Students also build communication, teamwork, and problem-solving skills, which are important to their overall development as young workers. These are unpaid student work experiences-analogous to the clinical rotations that are part of every medical school or business internship program.

The goal for each student participant is competitive employment. The program provides real-life work experience combined with training in employability and independent living skills to help youths with significant disabilities make successful transitions from school to productive adult life. The Project SEARCH model involves an extensive period of training and career exploration, innovative adaptations, long-term job coaching, and continuous feedback from teachers, job coaches, and employers. As a result, at the completion of the training program, students with significant disabilities are employed in nontraditional, complex and rewarding jobs.<sup>108</sup>

The campus VAC, in collaboration with other campus special education staff, makes referrals to Project SEARCH.

Focus group participants also shared feedback for the transition program, specifically:

- they wish there were more supports for students “the middle” who are not ready or able to seek out jobs but can no longer do academics;
- sometimes the transition program feels like “babysitting” for students when the academics are done (19-22 year olds);

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<sup>108</sup> For more information: <http://www.projectsearch.us/Home.aspx>

- ALE students follow the same four-year plan as other students but at times this does not seem like it is in the best interest of the student. These students often have repeat courses like art and physical education because there are not enough other accessible elective options for them. Some said it is a weakness, and high schools struggle each year with course selections for these students.
- what planning can take place for students with disabilities who are going to college but may not be academically successful without the supports they received in high school.

### **Organizational Support and Resources**

The transition program is overseen by a Transition Specialist in the Special Education Department. The specialist serves as the teacher of record for the 12+ program, is responsible for the monthly parent transition information nights, and supports the vocational teachers on campuses when they write students' transition plans. The Transitional Specialist also coordinates a monthly meeting for the vocational teachers and provides training for them. A recent focus has been on pairing up with the Parent Trainers at the district to target younger students and their families to get them connected to agencies earlier.

In the past, the district had seven coaches who helped support students in the community on their job sites. These coaching positions were eliminated due to budget constraints and realignment. As a result, there are now limitations on how many students can be at job sites and where they can be so that they are still adequately supervised.

Guidance and training on transition is provided by Region 10. There is a monthly transition meeting with Region 10 and GISD staff attends Texas transition conferences. GISD has also developed some of its own resources, including a quick sheet that highlights agencies and their phone numbers as well as high-level considerations for families about transition. They would like to create standard resources around Medicaid waivers and benefits, guardianship, and supportive decision making. The district is also starting to participate in the Pre-Employment Transition Services (Pre-ETS) program managed by the Texas Workforce Agency.

### **Future Planning**

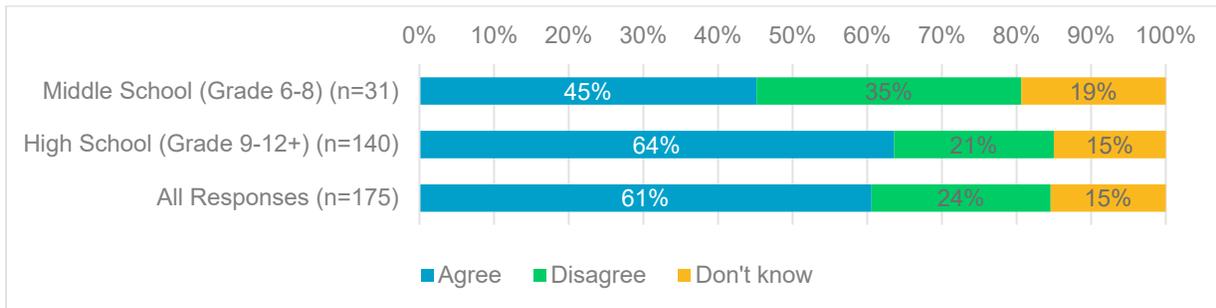
Focus group participants shared the areas in which they would like to see expansion of the transition program and have more programs available to students, especially for those in 12+. A few of the ideas included:

- looking at some grants to start a program for students with a disability to get an internship or access a certificate program at select colleges
- supporting the development of a new course next year called Student to Industry Connections so more students can gain work-based learning experience
- developing a Transition Center for students who are not ready to go to a job but who are on wait lists for agency services

### **Parent Survey**

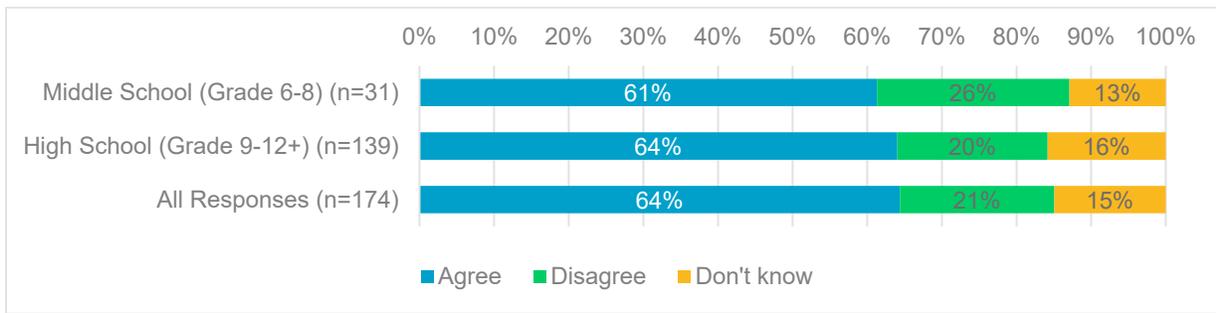
Of the parents whose child was 14 years or older, 61 percent agreed that the IEP team identified transition services to help their child. The percentage of parents who agreed with this statement was lower for parents of students in middle school.

**Exhibit 74. Parent Survey: The IEP team identified transition services (for example community service, independent living skills, etc.) to help my child.**



Similarly, 64 percent of parents agreed that their child’s transition plan was preparing them for life after high school.

**Exhibit 75. Parent Survey: My child’s transition plan is preparing them for life after high school.**



**Graduation Outcomes**

TEA reports annual and longitudinal graduation rates. The **annual** rate is based on students who attended and graduated from school in a particular school year, regardless of when they were expected to graduate. The **longitudinal** rate is based on students who began 9<sup>th</sup> grade in a particular school year and were expected to graduate within a specified period of time: 4-years, or 5-year and 6-year extended times.<sup>109</sup> Information is presented for 1) annual graduation rates; 2) longitudinal graduation rates; 3) did not graduate but continued in high school; 4) State Performance Plan graduation outcomes; and 5) specialized diploma rates.<sup>110</sup>

The Elementary and Secondary Education Act (ESEA) requires states and LEAs to use a four-year adjusted cohort graduation rate (ACGR), which is based on the number of students graduating from high school in four years with a regular high school diploma. The number also includes students with the most significant cognitive disabilities assessed using an alternate assessment aligned with alternate academic achievement standards graduating with a state-defined alternate diploma. This total number is divided by the number of students who form the adjusted cohort for the graduating class. The cohort is assessed on the number of students who entered grade 9 for the first time adjusted by adding students who transferred in later during grade 9 or during the next three years and subtracting students who transferred out, emigrated to another

<sup>109</sup> 2018-2019 School Report Card Definitions, [https://tea.texas.gov/sites/default/files/2019\\_src\\_definitions.pdf](https://tea.texas.gov/sites/default/files/2019_src_definitions.pdf)

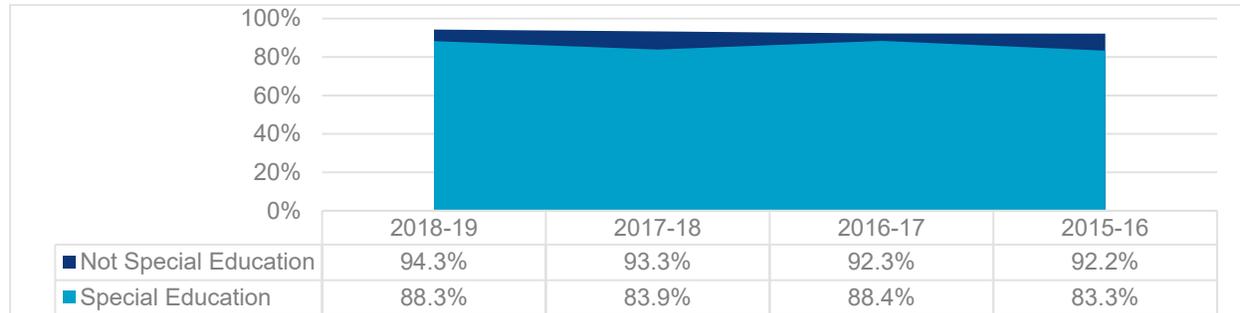
<sup>110</sup> Source for all graduation rates except for State Performance Plan: Texas Academic Performance Report - [https://rptsvr1.tea.texas.gov/perfreport/tapr/tapr\\_srch.html?srch=D](https://rptsvr1.tea.texas.gov/perfreport/tapr/tapr_srch.html?srch=D). State Performance Plan data =<https://rptsvr1.tea.texas.gov/idea/index.html>;

country, transferred to a prison/juvenile facility, or died. This measurement framework is used for all federal accountability frameworks, e.g., the State Performance Plan’s graduation indicator.<sup>111 112</sup>

### Annual Graduation Rate

GISD provided annual graduation rates for 2015-16 through 2018-19 for special education and not special education groups of students.<sup>113</sup> The special education rate increased by 5 percentage points (83.3% to 88.3%) while the not special education rate increased by 2.1 points (92.2% to 94.3%).

**Exhibit 76. Annual GISD Graduation Rate (Special Education and Not Special Education)**

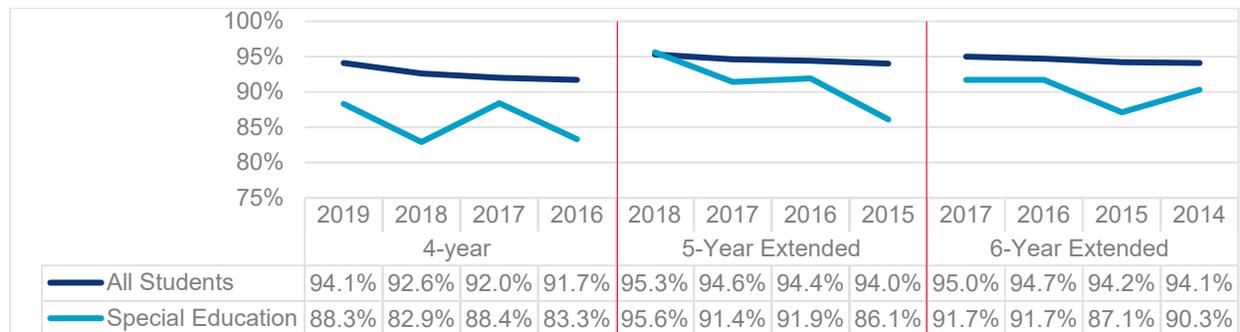


### Longitudinal Graduation Rates: 4-Year, 5-Year Extended, and 6-Year Extended

When comparing graduation rates for special education and all students by the earliest to latest year of data, special education rates increased by more percentage points.

- **4-Year Rates (2016 to 2019).** The special education rate increased by 5.0 percentage points (83.3% to 88.3%), while the all-student rate increased by 2.4 points (91.7% to 94.1%).
- **5-Year Rates (2015 to 2018 classes).** The special education rate increased by 9.5 percentage points (86.1% to 95.6%), while the all-student rate increased by 1.3 points (94.0% to 95.3%).
- **6-Year Rates (2014 to 2017 classes).** The special education rate increased by 1.4 percentage points (90.3% to 91.7%), while the all-student rate increased by 0.9 points (94.1% to 95.0%).

**Exhibit 77. Longitudinal Graduation Rates: 4-Year and 5-/6-Year Extended (Special Education & All Students)**



<sup>111</sup> "Every Student Succeeds Act High School Graduation Rate Non-Regulatory Guidance", US Dept of Education <https://www2.ed.gov/policy/elsec/leg/essa/essagraderateguidance.pdf>

<sup>112</sup> Under Texas law, a student who meets one or more of the following criteria is excluded from campus and district rate calculations for state accountability purposes: court-ordered to attend a high school equivalency program, certificate not earned; previously reported as dropout; not eligible for state funding; initial enrollment in U.S. schools was in grades 7-12 as unschooled refugees and asylees; in the district exclusively as a function of having been detained at a county detention facility; and incarcerated in state jail as or federal penitentiaries as adults or as persons certified to stand trial as adults.

<sup>113</sup> TEA Completion, Graduation, and Dropout Guidance (website) <https://tea.texas.gov/reports-and-data/school-performance/accountability-research/completion-graduation-and-dropout/completion-graduation-and-dropouts-data-search>

### Students Who Did Not Graduate but Continued in High School

When comparing the first and last years of data for each of the three longitudinal measures of students who did not graduate but continued in high school, the special education and all-student rates were both larger in the first year compared to the last year of reported data. For each measure, the special education percentage point decrease was larger than for the all-student point decrease.

- **4-Years (2016 to 2019).** The special education rate decreased by 3.4 percentage points (8.7% to 4.3%) while the all-student rate decreased by 1.1 points (3.4% to 2.3%).
- **5-Years (2015 to 2016 classes).** The special education rate decreased by 1.1 percentage points (1.1% to 0.0%) while the all-student rate decreased by 0.2 points (0.2% to 0.4%).
- **6-Years (2014 to 2015 classes).** The special education rate decreased by 0.3 percentage points (0.3% to 0.0%) while the all-student rate decreased by 0.1 points (0.1% to 0.0%).

**Exhibit 78. Students Who Did Not Graduate but Continued in High School (All Students & Special Education)**



### RHSP/DAP/FHSP-E/FHSP-DLA Graduation Program Rates

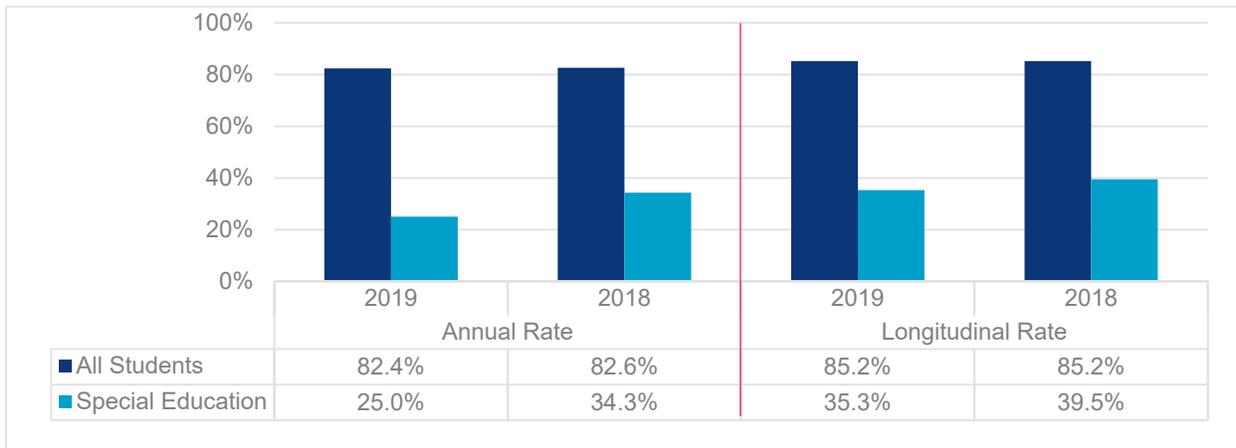
Texas has one diploma for all students although there are various graduation programs, which are documented in each student’s academic achievement record (or transcript) that differentiates the student’s individual accomplishments, achievement, and courses completed. The graduation programs are: 1) Recommended High school Program (RHSP); 2) Distinguished Achievement Program (DAP); 3) Foundation High School Program plus an endorsement (FHSP-E); 4) Distinguished Level of Achievement (FHSP-DLA); and 5) Foundation High School Program (FHSP). The Texas Academic Performance Report includes graduation rates for each of the programs listed above, and for the sum of all. The Exhibit below shows the sum of the programs by all students and special education.

For students graduating in 2018 or 2019 with one of the graduation programs, the outcomes are different based on annual or longitudinal rates.

**Annual Rates.** The special education rate decreased by 9.6 percentage points (34.3% to 25.0%) while the all-student rate decreased by 0.2 points (82.6% to 82.4%). The percentage point gap between these two groups increased by 9.1 percentage points.

**Longitudinal Rates.** The special education decreased by 4.2 percentage points (39.5% to 35.3%) while the all-student rate remained flat at 85.2%. The percentage point gap between these two groups increased by 4.2 points.

**Exhibit 79. RHSP/DAP/FHSP-E/FHSP-DLA Annual and Longitudinal Graduation Rates**



**4-Year Federal Graduation Rate Without Exclusions (Gr 9-12) and SPP Graduation Rate**

The exhibit below compares the 2019 State Performance Plan and GISD special education graduation rates and target with the 4-year graduation rates without exclusions based on federal graduation criteria for all-student and special education groups. (2017 to 2019 classes). The 4-year without exclusion rates are also compared to the exclusion-based rates.

Using the federal criteria, GISD rates for students receiving special education were more similar to the SPP rates than were rates with exclusions.

**No Exclusions Compared to With Exclusion Rates.** The special education no exclusion rate decreased by 2.8 percentage points (74.0% to 71.2%) while the exclusion rate decreased by only 0.1 points (88.4% to 88.3%). By comparison the all-student no exclusion and exclusion rates both increased by 2.1 percentage points.

**SPP Rates.** For 2019, the special education graduation rate was 1 percentage point below the state rate (77%) and both rates were below the 89% state target.

**Exhibit 80. 4-Year Federal Graduation Rate Without Exclusions & SPP Graduation Rate**



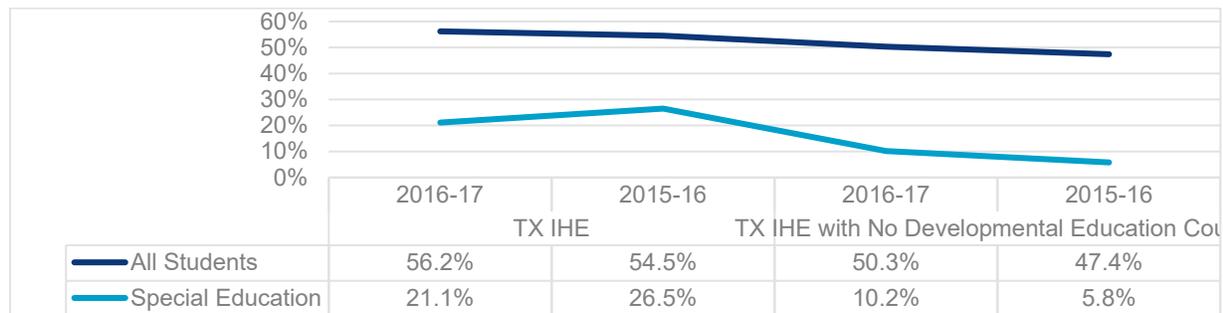
### ***GISD Graduates Enrolled in TX IHE and Graduates with No Developmental Education Courses***

The Exhibit below shows percentages for GISD all-student and special education graduate groups enrolled in Texas institutions of higher education (TX IHE). It also shows the percentages of these graduates who did not have to take developmental education courses while in TX IHE. These rates were for the 2015-16 and 2016-17 school years.

**GISD Graduates in TX IHE.** The special education rate decreased by 5.4 points (21.1% to 26.5%), while the all-student GISD graduate rate of students enrolled in TX IHE increased by 1.7 percentage points (54.5% to 56.2%). Between these two years, the gap between these two groups increased from 28.0 percentage points (2015-16) to 35.1 points (2016-17).

**GISD Graduates in TX IHE with No Developmental Education Courses.** The GISD special education graduate rate without these courses increased by 4.4 percentage points (5.8% to 10.2%) while the all-student rate increased by 2.9 points (47.4% to 50.3%).

**Exhibit 81. GISD Graduates in TX IHE & Graduates with NO Developmental Ed Courses (2015-16 to 2016-17)**



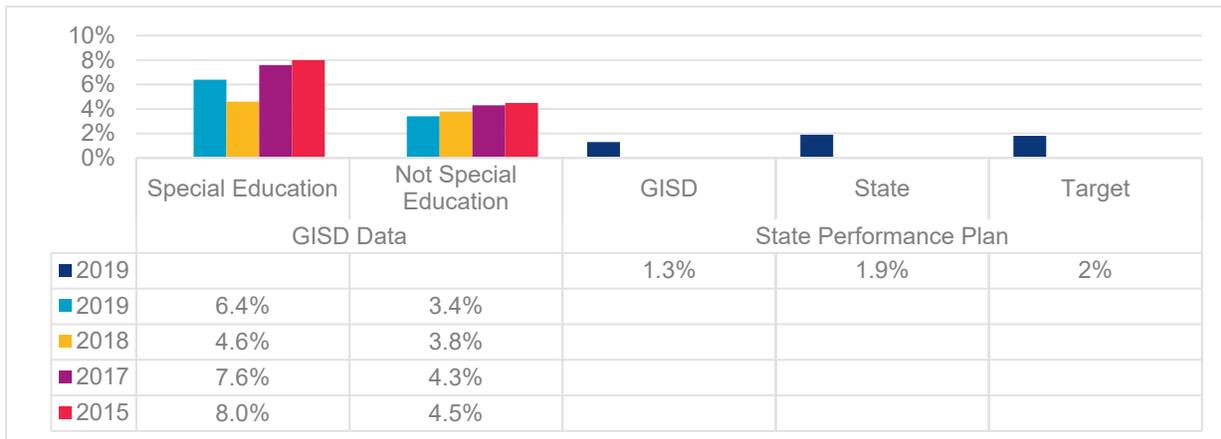
### ***Dropout Rates***

The exhibit below shows dropout rates based on data GISD provided to PCG for students identified and not identified for special education from 2015 to 2019, and the State Performance Plan for 2019. For 2019, the GISD data showed substantially higher dropout rates for special education than did the SPP.

**GISD Data.** From 2015 to 2019, special education rates decreased by 1.6 percentage points (8.0% to 6.4%), while no special education rates decreased by 1.1 points (4.5% to 3.4%).

**SPP Data.** For 2019, the GISD special education rate of 1.3% was below the maximum 2% SPP target and below the state’s 1.9% rate.

**Exhibit 82. Dropout Rates: Special Education & Not Special Education (2015-2019) and SPP Rates (2019)**



## Summary and Implications

GISSD is regarded as a high-performing district that prioritizes the achievement of students; yet students with disabilities have not made as many significant strides in learning as their non-disabled peers. This can be attributed to an “exclusionary mindset” that is pervasive throughout all levels of staff and leadership in GISSD. Narrative data from this review suggests that programming and systematic barriers, both physical and psychological, have negatively affected the academic trajectory for students with disabilities in GISSD.

Under the present structure in GISSD, some of its most pressing challenges include the following:

Students of color are disproportionately overidentified in certain disability classifications, placed in more restrictive settings, and subjected to harsher behavioral consequences.

- Black students identified for special education were 2.76 times more likely than non-Black identified students to be suspended. With a risk ratio of 4.09, the likelihood was higher for Black students not identified for special education to be suspended compared to identified Black students (2.76 risk ratio). It is important to note that all four identified students who were suspended for more than ten days were Black. No other racial/ethnic group had a risk ratio higher than 0.97 for either identified or not identified students.
- Black students identified with an emotional disturbance were 3.72 times more likely than non-Black students to learn in specialized classes, i.e., general education less than 40% of the time environment. With a risk ratio of 1.99, white students with ED had the next highest likelihood. No other group had a risk ratio that exceeded 1.22.

A belief by some building administrators that students with more complex or significant disabilities and programs to support their growth are not welcomed. A fixed mindset is fostered by instruction that is inclusive in name only, where building administrators are not supportive of co-teaching and a belief by some building administrators that their buildings are not suited for students with disabilities.

A misconception that progress targets must be set at 70% mastery and processes for tracking progress with fidelity. Case Managers and Related Service Providers have access to digital databases to gather and track a student’s progress toward mastery of goals. However, IEPs reviewed as part of the file review had 70% mastery listed and versions of 10% mastery increments across quarters. This arbitrary process undermines the work of students with disabilities and the tenets of IDEA (2004).

Inconsistent use of MTSS to assist struggling learners or to inform the special education referral process. Conflicting and sometimes misconstrued beliefs on how MTSS can potentially support the needs of students who may be identified in the future as students with disabilities.

Staffing models that are not fluid or responsive to existing needs. There is an overreliance on paraprofessionals who do not have expertise in the fundamentals of Specially Designed Instruction and how to dynamically deliver it within an inclusive setting. According to the narrative data and file review, special educators are often providing SDI in “15-minute intervals” which is neither effective nor appropriate. This has led to limited consistency in collaborative and co-teaching models, despite Stetson training, and paraprofessional staff members providing supplementary instruction 1:1 for students with disabilities.

One recurring concern across respondents was the lack of responsiveness and fluidity of staffing allocations throughout the school year. Relying on a stringent number of staff, particularly support staff, with little to no room for diversification to support changing enrollment needs has a direct implication on SDI for students with disabilities.

Currently, GISD has limited LRE settings to support diverse learners and programming to support students with more complex trauma or behavioral challenges. There have been numerous reports related to the treatment of students with disabilities in GISD.

- Of all GISD students, 291 (0.54%) were suspended for at least 1 day. Of all suspended students, 252 or (86.6%) were students identified for special education. Furthermore, 4.67% of all identified students were suspended compared to 0.08% of students not identified, making identified students 58 times more likely than non-identified students to receive an OSS.

GISD special education leadership is not using staff for their capacities, particularly mental health professionals (LSSPs) operating exclusively to complete assessments. The lack of structural and LRE opportunities for students with mental health concerns has resulted in the closing of PAC and high rates of black students being identified as having emotional disabilities and being educated in restrictive settings. There needs to be programmatic and systemic shifts to prioritize the talents of mental health practitioners to more student-facing supports and counseling services and to redesign assessment practices.

A preclusion to identify young children, ages 3-5, as having autism spectrum disorder (ASD) in lieu of a more developmentally appropriate classification of “Non-Categorical Early Childhood (NCEC)” exists within GISD. The strategy of diverting all “autism” or “autism suspected” referrals to teams staffed with Related Service Providers exclusively engaged in this work is ineffective from both a workflow and programming perspective. Subsequently, presuming all referrals for students with “autism-like” behaviors must be evaluated by a team operating with the sole purpose of identifying children as having ASD may lead to this preclusion to identify young children as demonstrating delays aligned with the educational disability classification for ASD rather than considering NCEC.

Taking action to resolve these systemic and programmatic barriers is critical to GISD’s ability to prioritize the academic and social emotional well-being of students with disabilities. New leadership at the district-level and ongoing support to school-based staff will require a fundamental mindset shift towards meaningful inclusion and engaging daily in ethical practices to support students with disabilities.

## V. HIGH EXPECTATIONS, LEADERSHIP, AND SHARED ACCOUNTABILITY

As the education field constantly seeks to increase student achievement, particularly for students with disabilities, it is critical to not only look at the effect of research-based instructional practices or socioeconomic status on academic achievement but also at any other factors that may potentially have a positive impact. The current achievement levels for students with disabilities nationwide are still behind that of their non-disabled counterparts, which suggests that providing schools with extra funds and an aligned curriculum alone will not raise student achievement.

As educational leaders are being held more responsible for student growth, it is necessary not only to adequately identify those factors but to understand how a culture of academic optimism can cultivate a growth mindset.

This section centers on the expectations that GISD has for students with disabilities and the degree to which an inclusive mindset is evident, and how leaders collaborate and are held accountable for supporting all students.

### Inclusivity and High Expectations

As educators, finding methods to meet the academic needs of students with disabilities can be challenging. Inclusive education has proven effective in promoting positive student outcomes through strategies that focus on fully engaging all students regardless of their disabilities or other learning challenges. Inclusive education, as required in federal and state regulations, encompasses practices that concentrate on creating meaningful access to instruction for all students across academic, social, and physical environments.

Inclusive education is both a vision and a practice of welcoming, valuing, empowering, and supporting the diverse academic, social/emotional, language, and communication learning of all students in shared environments and experiences for attaining the desired goals of education. Inclusion is a belief that everyone belongs, regardless of need or perceived ability, and that all are valued and contributing members of the school community. Inclusive practice is an approach to teaching that recognizes the diversity of students, enabling all students to access course content, fully participate in learning activities, and demonstrate their knowledge and strengths.

### *District Practices*

Focus group participants shared their insights on inclusion in GISD. Overall, there is a strong sentiment across many stakeholders that GISD generally does not provide an inclusive environment for students with disabilities, though there is a district-wide focus on diversity, equity, and inclusion (DEI) overall. Participants shared:

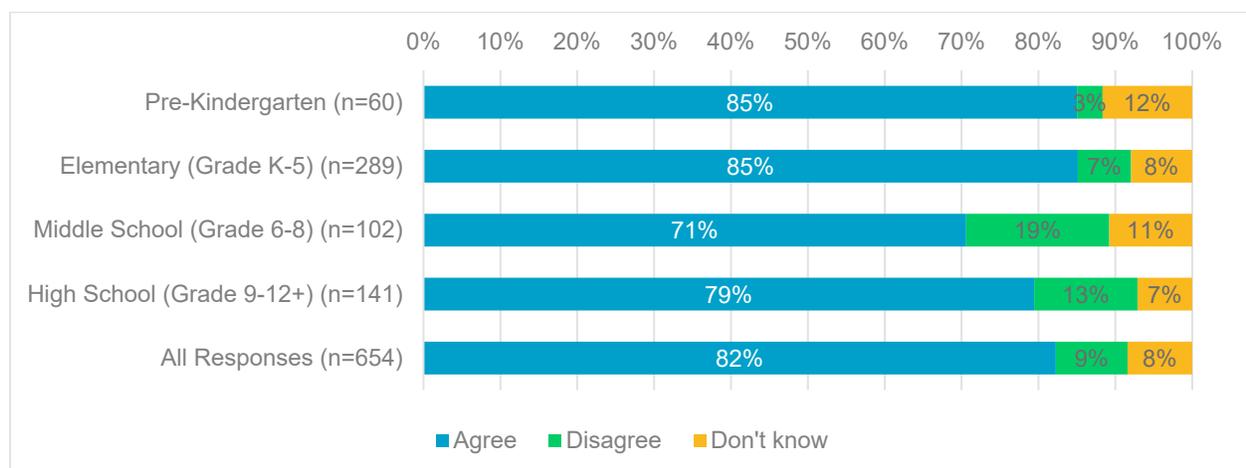
- “Right now our culture and mindset is one of exclusion.”
- “There’s a lack of embracing kids as yours once they’re in the door... Some teachers are great at it; some really put [them] in a box.”
- “We don’t use people first language. We say ‘that’s a PAC kid’ – students are defined by their disability.”
- “There is a lack of ownership of kids’ success... We need to change the mindset so that we are all responsible for every student’s success; seeing students be successful on their continuum.”
- “Principals need to have the mindset that they serve all students.”
- “We have teachers who expect certain students to come through the door, and think they get to choose who can stay in their class.”
- “Principal engagement varies from campus to campus – not every principal wants students with autism in a self-contained classroom but some do.”

- “It appears to me that current popular thought is that inclusion is the preferred method— but there is a lot of push back from the community because kids are doing great in separate programs. I’m worried about putting them in general population.”
- “We have some systemic issues in values/philosophies in special education.”
- “Schools think that behavior issues need to go somewhere else – they want students moved because don’t think it’s their job. It’s the same in resource classes too. Teachers are wanting them to move to ALE.”
- “It’s more that the adult population isn’t able to accept all students. Students themselves are much more accepting.”
- “I wish that special education teachers could work more closely with the gen ed teachers. It seems like ‘two different worlds’ and they don’t share what students are learning or where they need help.”
- “We had a principal in a meeting recently who was pushing a student out of their building saying that they are a “PAC kid” even though the student doesn’t meet any criteria... we need to change that mindset – and with PAC not being an option any longer, then principals will have to find another way.”
- “I think you want to be really careful about inclusion because parents don’t want their kids in the same class with kids with disabilities.”

Two years ago, prior to the start of the pandemic, the district engaged with Stetson and Associates to begin work on developing an inclusive culture. GISD staff participated in trainings and started to review schedules and staffing. One participant said “when you go through Stetson training, it’s a ton of work, but it’s beneficial. It creates culture change!” Unfortunately, because of the rapid shift to virtual learning in spring 2020, the training was not internalized nor supported in a way that allowed for the follow through needed to change mindsets and the overall culture. Several school-based staff who participated in this training though said that because the district was still missing the “foundational pieces” and that jumping to the “really high-level things without connecting the dots” was a lost opportunity. Many school leaders said they were confused about what they should do now and questioned if this was something they needed to make a priority for next year.

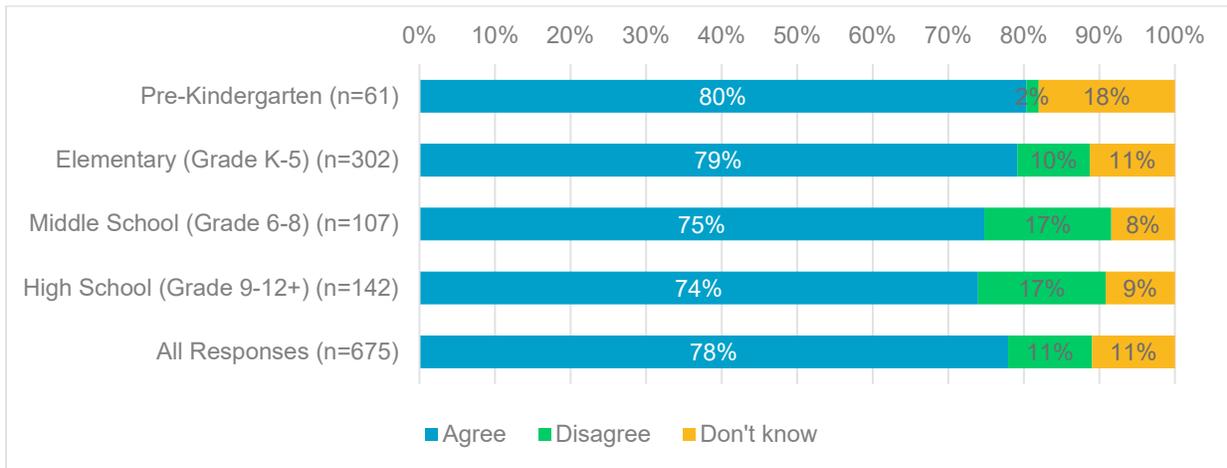
Parents offered a different perspective about inclusion when asked, on the survey, if the principal sets a positive and welcoming tone for in their child’s school.

**Exhibit 83. Parent Survey: The principal sets a positive and welcoming tone in the school.**



The majority of all parents (82%) agreed. This rate was higher (85%) with parents of students with disabilities in Pre-K and lower (71%) for parents of students with disabilities in middle school.

**Exhibit 84. Parent Survey: General education and special education teachers work together to assure that my child's IEP is being implemented.**



According to responses on the survey, the majority of parents (78 percent) agreed that general education and special education teachers work together to assure that their child's IEP is being implemented. The percentage of parents with the highest level of agreement were parents of students in elementary grades (79 percent) and lowest among parents of students in high school (78 percent).

The notion that students with disabilities at the campus level are “separate” extends to the central office operations of special education as well. Participants cited the silos that exist between departments and how central special education staff historically have not been respected nor appreciated for their extensive knowledge or experience. Specifically:

- “Special education has always had a ‘negative vibe’ in the district – people don’t have respect or appreciate the services provided.”
- “There are lots of ingrained philosophies that have ‘settled’ and need to change from the top down.”
- “Overall, there is not support for special education.”
- “Communication between us [special education department] and campuses needs serious work. I’m not sure of the solution, but we don’t have enough voice in what the process should look like for our special education students on campuses.”
- “We [special education department] are left out of the process for pretty much everything.”
- “There needs to be more respect for what we do and the services we provide – one example is of an SLP being told by the principal they would no longer have a room for therapy and to conduct evaluations.”
- “Sometimes there is an ‘us against them’ mindset about special education.”

These circumstances can change with a district-wide will and intent to better understand special education and its purpose and building collaborative relationships from the special education department to other offices and campuses and vice versa. Under the leadership of the previous executive director of special education, this was beginning to change. One focus group participant said that the department is responsive now – which has not always been the case – and there was an “attempt to have more coherence between the department itself and what’s going on with campuses. The work with Stetson has been an improvement – classroom teachers supporting special ed has been an improvement – how they push in specialized programs into general education has been an improvement.”

A core component of an inclusive culture is setting high expectations for all students. Specifically, the general education classroom at the student’s enrolled grade level is the reference point for student-specific planning, instruction is based on the curriculum standards adopted by the district or the state, and

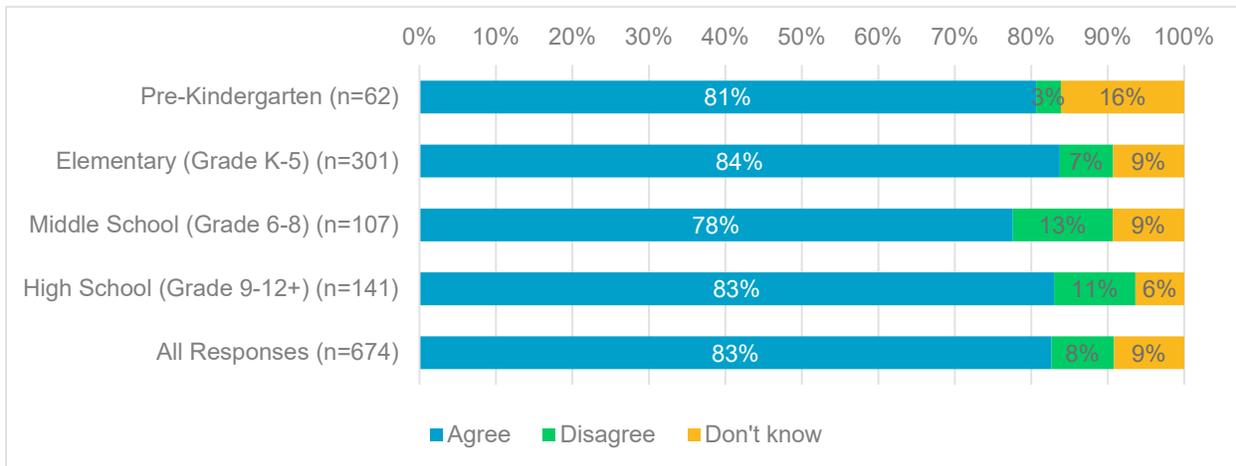
individualized supports are available when needed. Though focus group participants did not discuss at length the expectations they set for students with disabilities, they did share the academic challenges they believe are associated with having students with disabilities in their schools. Participants shared:

- “School staff believe accountability is harmed by the larger special education population.”
- “If your school gets 2 or 3 of the units with 4th/5th grade students in them, this could mean 20 students will be added to your accountability, so you are not going to pass STAAR.”
- “Accountability with administrators at the school level is sometimes lacking leading them to do what they want, which may not be legal or in the best interest of the student.”

Inherent in many of these comments is the assumption that students with disabilities are a liability, that they are not capable of positively contributing to a school’s assessment results, and that the school does not have a responsibility to build scaffolds and supports to help them reach their academic potential.

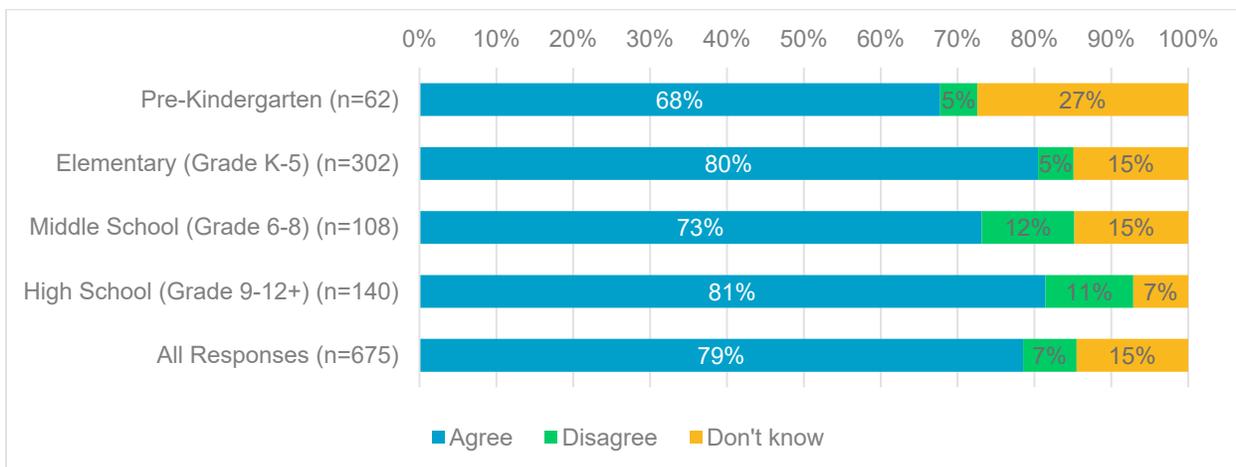
However, parents again offered a different perspective when surveyed.

**Exhibit 85. Parent Survey: My child's special education teacher(s) have high expectations for my child.**



When asked, on the survey, if their child’s special education teacher has high expectations for their child, the majority of parents (83%) agreed. Parents of students in middle school disagreed at a higher rate (11%) than the overall average (8%).

**Exhibit 86. Parent Survey: My child's general education teacher(s) have high expectations for my child.**



A slightly smaller percentage of parents (79%) agreed that their child's general education teacher had high expectations for their child. Similar to the previous question, parents of students in middle school disagreed at a higher rate (1%) than the overall average (%).

## Leadership, Collaboration, 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*.<sup>114</sup> The report summarizes research the Council conducted with the American Institutes for Research (AIR) on characteristics of urban school districts that had 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. This helps to create a culture of shared responsibility for student achievement. Other research found similar results and articulated barriers to effective teaching and learning.<sup>115</sup> School districts that effectively support school leadership often demonstrate a capacity to facilitate learning and development, address barriers to learning and teaching, 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.

### *District Practices*

During the team's review of GISD's documents and discussions with focus group participants, the following issues concerning leadership, accountability, and collaboration were identified.

### *Leadership and Accountability*

- "Special education has taken the heat for a larger system problem. There is a real disregard for special education in its advisory capacity and a disregard for special education law and regulation. There is a feeling that schools do what they want to do regardless of what anyone says, with lots of leap frogging over the head of the special ed coordinator/director. This creates a problem in the system."
- "Principals decide what they will or will not do and that has been allowed to prevail."
- "Special education staff are very proactive and wanting to do things with situations arise. The dilemma comes in that though they bring expert knowledge, the principal says this is not how it will go."
- "Principals go by what they think they know, not what they know or what is law."
- "In the past, some of the decisions catered to what principals wanted instead of what was best for kids."
- "Principals used to ask questions and participate in the ARD, but they have let it fall to the side for diags to handle. It would be nice to have principals in the meeting to back me up on what I'm saying."
- "There are some really great principals but some who want to override the ARD process. A student has behavior issues, principal wants them tested and moved to a behavior unit yesterday. They do not have strong student support teams on campus – when they get to the point of referring for evaluation – no one thinks it their job to get it done."

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<sup>114</sup> "Pieces of the Puzzle: Factors in the Improvement of Urban School Districts on the National Assessment of Education Progress"

Retrieved from [http://www.cgcs.org/cms/lib/DC00001581/Centricity/Domain/4/Pieces%20of%20the%20Puzzle\\_FullReport.pdf](http://www.cgcs.org/cms/lib/DC00001581/Centricity/Domain/4/Pieces%20of%20the%20Puzzle_FullReport.pdf)

<sup>115</sup> Toward a School District Infrastructure that More Effectively Addresses Barriers to Learning and Teaching, A Center Policy & Practice Brief, Center for Mental Health in Schools at UCLA. November 2011, at <http://smhp.psych.ucla.edu/pdfdocs/briefs/toward%20a%20school%20district%20infrastructure.pdf>

- “It’s part of the chaos of the system – if you try to intervene with teachers, principals get their hackles up; if you intervene with principals, the area director gets his or her hackles up.”

### **Collaboration**

- “Campuses have preconceived ideas about what the department is doing and the department has preconceived ideas about what the campuses are doing.”
- “A lot of times the communication is not there to help principals perform their jobs correctly.”
- “Sometimes the principals feel central office is not supporting them so they can serve the students the way they need to.”
- “There is a lack of trust from both sides (campuses and central office/sped). Principals don’t feel that special education is coming in alongside them, and special education feels that principals are not making decisions the way they need to.”
- “Cross communication is huge but isn’t happening in our district.”
- “I’ve tried to go out in the district and build relationships, but when you talk about special education, it’s never positive.”
- “Special education is not supported, and we are not doing what is necessary for the department to be supported.”
- “Collaboration has been there, but not in terms of understanding roles and responsibilities and parents/families don’t feel the disconnect between what the process is.”
- “There has been a positive shift in recent months, with the special education department positioning itself as a resource to campuses- past approach was more hands off.”

### **Summary and Implications**

The value students with disabilities add to a school culture cannot be underscored. It is evident that GISD leadership must create a shared culture of responsibility for all student achievement. Additionally, school-based staff must be equipped to foster this belief system within their buildings and no longer view students with disabilities as a liability. Although GISD parents have not reported feeling this cultural bias, it remains unclear whether students with disabilities recognize how they are perceived.

## VI. HUMAN CAPITAL

This section reviews GISD-specific data on the following topics: 1) staff hiring and retention, 2) staffing ratios including comparative data to provide context for findings, 3) professional development, and 4) summary and implications

### Staff Hiring and Retention

Ensuring a highly qualified and effective staff that have the skills and training needed to provide the services and support needed to promote the success of diverse learners requires sustained attention and deliberate actions by district leaders.

A consistent theme expressed in interviews and focus groups concerned inadequate school-based staffing to support students with disabilities. School and district leaders, teachers and other staff noted a number of unfilled vacancies and commented on the challenges of recruiting high-quality staff to special education positions in GISD. Staff observed competition with neighboring districts to fill special education positions. An administrator commented, “[there’s] no system to help us recruit specialized individuals, and it gets harder and harder to fill these roles.” District staff reported that the district was in the process of reviewing its hiring practices. Several shared stories of recent hiring efforts with too few applications and recruitment for mid-year vacancies were noted as a particular challenge. District staff shared that GISD started offering annual, additional stipends for special education teachers (for self-contained and for resource/inclusion) as a recruitment and retention incentive. They also noted using new outreach strategies including social media platforms.

For some district positions in which there are shortages (participants identified Diagnosticians, Speech Language Pathologists, and Occupational Therapists, specifically), district staff noted that GISD now recruits throughout the year. Focus group participants were also concerned about the limited pool of specialized applicants who also have a background in English as a Second Language. They noted that the GISD has supported targeted recruitment to increase the number of teachers with this background.

Several staff speculated that limited support for staff is a contributing factor to their retention challenges as well as with recruitment. This was echoed in recent teacher feedback to Human Resources indicating that a primary factor in teacher decision-making about staying in their positions is the level of professional support. For example, an administrator stated that, “[there’s] high turnover for new teachers because they feel unsupported.”

### Staffing Ratios

Comparative student-to-personnel ratios are useful for school districts to benchmark their staffing levels. The data discussed below were collected by PCG team members through their participation in reviews conducted by PCG, the Council of the Great City Schools, and the Urban Collaborative/Leading Equity and Inclusive Education. *The data do not give precise comparisons, so the results must be interpreted with caution.* District data are not consistently reported (e.g., some districts include contractual personnel and others may exclude them) and are sometimes affected by varying placement types used by a school district. The data may count all students with IEPs, including those placed in charters, agencies, and nonpublic schools. Still, these data are the best available and are useful as a rough guide to staffing ratios.

The ratios reported below are provided for special educators, paraprofessionals, speech/ language pathologists, psychologists, nurses, occupational therapists (OTs), and physical therapists (PTs). The figures do not reflect actual caseload ratios for each of these personnel areas based on student IEPs. Rather, they are based on full time equivalent (FTE) staff members and not on the number of positions *per se*. The total FTE count for each area is compared to the total number of students with IEPs in the district.

GISD ratios are compared to 80 other urban school districts on which we have data. (All districts did not report data in each area.) FTE data included vacant positions, which are specified for GISD.

The data do not provide precise comparisons, so results must be used with caution and not be solely relied upon to make personnel decisions. Rather, they should be used to investigate, along with other information, the extent to which personnel in areas outside the norm are being used effectively, how they are meeting the needs of students, and whether adjustments are warranted. In addition, district data are not consistently reported (e.g., some districts include contractual personnel and others exclude them) and data are sometimes affected by varying placement types used by school districts. These data may count all students with IEPs, including those placed in charters, agencies, and nonpublic schools, while other districts do not count these. Still, these data are the best available and are useful as a rough guide to staffing ratios. Appendix B has detailed data on each reporting school district and a table showing ratios in ascending order by personnel area.

### Overall School District Ranking

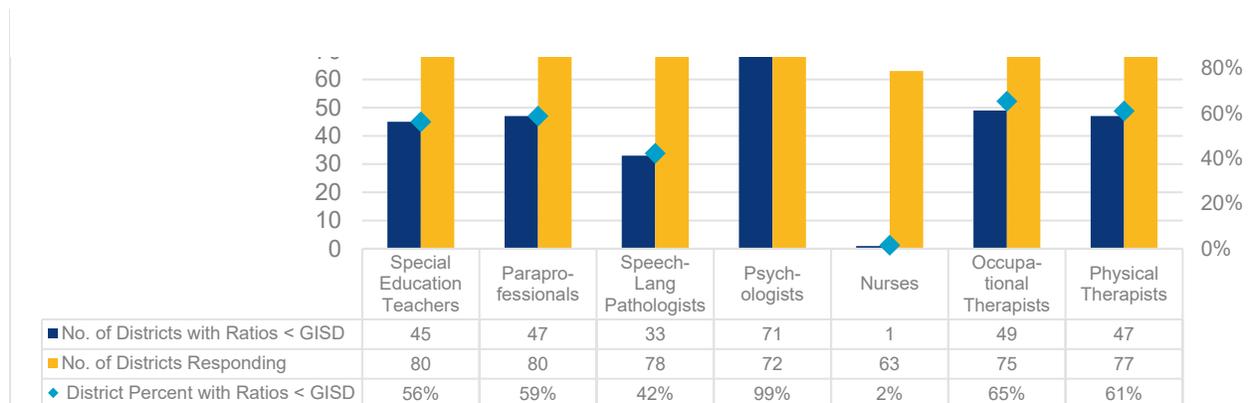
Data in the exhibit below show percentages of districts with IEP-to-staff ratios by personnel area that were *smaller* than GISD's, meaning these districts had fewer students to each staff in the specified area.

**Low Rate of Districts with Smaller Ratios.** Only one district had a smaller nurse to student ratio than GISD.

**High Rate of Districts with Smaller Ratios.** In the area of psychologists, all other districts had a smaller ratio than GISD. Most of these other districts did not employ educational diagnosticians as GISD does, which most likely explains GISD's reliance on psychologists to a much smaller degree. Other districts that employed educational diagnosticians included FTE numbers in the psychology category.

The remaining personnel areas were in districts with mid-range ratios smaller than GISD. These areas were special educators (56%), paraprofessionals (59%), speech/language pathologists (42%), occupational therapists (65%), and physical therapists (61%).

Exhibit 87. Number and Percentage of Districts with Smaller Ratios than GISD's



### Special Educators and Paraeducators

The Exhibit below shows the district's students with IEPs-to-personnel ratios for the areas of special educators and paraprofessionals.

**Special Educators.** With 371 full-time-equivalent (FTE) special education teaching positions, including 15 that are vacant, GISD had an average of 11.5 students with IEPs (including those with primary

speech/language impairments) for every special educator.<sup>116</sup> GISD’s 11.5 ratio was higher than the overall 13.9 students to teacher average, ranking GISD as 46<sup>th</sup> among 80 reporting districts. Compared to GISD, 56% of the districts had a smaller average number of students with IEPs per special educator.

**Paraprofessionals.** With 338 FTE paraprofessional positions, including 27 that are vacant, GISD had an average of 15.9 students with IEPs for every paraprofessional. GISD’s 15.9 ratio was higher than the overall 14.3 students to paraprofessional average, ranking GISD as 48<sup>th</sup> among 80 reporting districts. Compared to GISD, 59% of the districts had a smaller average number of students with IEPs per paraprofessional.

**Table 5. Average Number Students for Each Special Educator and for Each Paraprofessional**

|   | Special Educators                | Paraprofessionals                |
|---|----------------------------------|----------------------------------|
| Number of GISD Staff FTE                    | 371                              | 338                              |
| GISD Students w/IEP-to-Staff Ratios         | 11.5:1                           | 15.9:1                           |
| All District Average Ratios                 | 13.9:1                           | 14.3:1                           |
| Range of All District Ratios                | 7–37:1                           | 4.3–56:1                         |
| GISD Ranking Among Districts <sup>117</sup> | 46 <sup>th</sup> of 80 districts | 48 <sup>th</sup> of 80 districts |

### **Related Services Personnel**

Related-services personnel ratios are summarized below.

**Table 6. Average Number Students for Each FTE Related Service Personnel Area**

| Related-Services Areas         | Speech/Lang Pathologists | Psychologists          | Nurses                | OTs                    | PTs                    |
|--------------------------------|--------------------------|------------------------|-----------------------|------------------------|------------------------|
| Number of GISD Staff FTE       | 57                       | 9                      | 89                    | 12                     | 5                      |
| GISD Students w/ IEPs-to-Staff | 94.6:1                   | 599:1                  | 61:1                  | 449:1                  | 1,078:1                |
| All District Average Ratio     | 118:1                    | 173:1                  | 165:1                 | 381:1                  | 1,016:1                |
| Range of All District Ratios   | 31–396:1                 | 26–599:1               | 58-834                | 64-1685                | 128-2941               |
| GISD Ranking                   | 34 <sup>th</sup> of 78   | 72 <sup>nd</sup> of 72 | 2 <sup>nd</sup> of 64 | 50 <sup>th</sup> of 76 | 48 <sup>th</sup> of 77 |

**Speech/Language Pathologist (SLP).** There were 57 FTE speech/language pathologists (SLPs) positions with no vacancies. Of the allocated positions, there were 94.6 students for each SLP, which was a lower ratio than the all-district average of 118 students per SLP. GISD ranked 34<sup>th</sup> of 78 reporting districts. Compared to GISD, 42% of these districts had a smaller average number of students with IEPs per SLP.

**Psychologists.** GISD had 9 FTE psychologist positions with no vacancies. Of the allocated positions, there were 599 students with IEPs for each psychologist, which was higher ratio than the all-district average of 173 students per psychologist. GISD ranked last of the 72 reporting districts. GISD’s use of educational diagnosticians to evaluate the academic achievement of students for special education evaluations has reduced the district’s reliance on psychologists for this purpose. Educational diagnosticians are not employed by almost all of the other districts that responded to this survey and therefore not included in these data.

**Nurses.** There were 89 FTE nursing positions (special education treatment and campus nurses) with 1 campus nurse position vacant. Of the allocated positions, there were 61 students with IEPs for each nurse,

<sup>116</sup> These and other ratios are based on allocated personnel positions, which include vacancies. Although special educators for the most part do not instruct students with a speech/language impairment only, as speech/language pathologists are the primary providers, these students were included as students with IEPs among all surveyed districts.

<sup>117</sup> Ranking begins with districts having a low average number of students to one staff person.

which was lower than the all-district average of 165 students for each nurse. GISD ranked 2<sup>nd</sup> of the 76 reporting districts. Compared to GISD, only 2% of these districts had a smaller average number of students with IEPs per nurse.

**Occupational Therapists.** There were 12 FTE OT positions, with no vacancies. Of the allocated positions there were 449 students with IEPs for each OT, which was a larger ratio than the all-district average of 381 students for each OT. GISD ranked 50<sup>th</sup> of 76 reporting districts. Compared to GISD, 65% of these districts had an average lower number of students with IEPs per OT.

**Physical Therapists.** There were 5 FTE PTs positions, with no vacancies. Of the allocated positions there were 1,078 students for each PT, which was similar to the all-district average of 1,016 students for each PT. GISD ranked 48<sup>th</sup> of 77 reporting districts. Compared to GISD, 61% of these districts had an average smaller number of students with IEPs per PT.

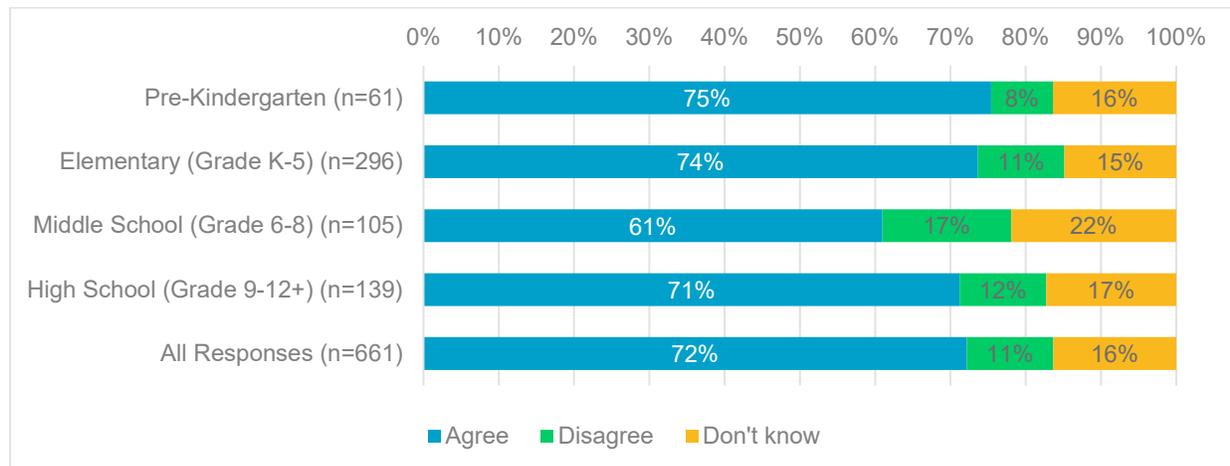
**Social Workers.** GISD reported that it did not employ any social workers. By comparison, the all-district average for this area was 251 students per social worker.

### Parent Perception

Parents who participated in focus groups shared positive comments about their students’ teachers and noted that they seemed invested in them, but some noted that the district lacked resources to staff more inclusive classrooms and expressed concern about compensation for paraprofessionals.

Of the parents who responded to the survey, 72 percent agreed that there is an adequate number of staff to implement their child’s IEP with consistency, while 16 percent did not know.

**Exhibit 88. Parent Survey: There is an adequate number of staff to implement my child’s IEP with consistency.**



## Professional Development

In order to provide the highest quality services and instruction to diverse learners, all staff must be engaged in ongoing professional learning. For teachers and other staff who provide direct services to students, high-quality professional learning must be ongoing, intensive (rather than one-day or short-term workshops or conferences) to have a positive and lasting impact on classroom instruction and teacher performance. Research reports that elementary school teachers who received substantial professional development – an

average of 49 hours – boosted their students’ achievement by about 21 percent.<sup>118</sup> As noted by one focus group participant, “We don’t have time to make up for the deficits that are created by one bad year with a person who isn’t equipped, trained or passionate.”

Professional learning in GISD is conducted throughout the year. Kick off in-service sessions occur during summer, the week preceding the start of school, with new teacher training occurring a week before that. Additional training is offered during early release days, on some Saturdays, during designated professional learning time within schools (e.g., professional learning communities), on an individual basis by accessing support from building staff, related service providers, and using outside providers. On-demand, asynchronous training opportunities also exist through the district LMS. Staff reported less training during the past year due to the COVID-19 pandemic, but also new opportunities that emerged, such as virtual workshops. There was a perception that increased virtual professional learning would also mitigate a substantial challenge to attend training because it would reduce the need for substitute teachers. Teachers in GISD are not compensated for professional development time.

Focus group and interview participants consistently highlighted several insights about professional learning in GISD. The first is that professional learning in GISD has, to date, provided a range of opportunities to staff, but those opportunities vary widely in frequency, focus and perceived utility. District and school-based staff observed that professional learning has not been systematic in its approach to promote professional growth and improved practice and that there has not been a transparent districtwide plan focused on special education professional development. Staff reported that district-level professional learning is driven by individual departments who develop departmental plans which are then loaded into the district’s learning management system. They described how department-level plans sometimes lead to competing claims on teachers’ limited time, with some departments overriding the decisions of other departments. An administrator also described how state mandates for professional learning can override district plans. School-based staff, in many instances, noted that they had to seek out opportunities through regional services centers, or other vendors, but that support and the approval process to attend additional professional learning is determined at the campus level or by area directors.

Teachers and administrators noted the difficulty of finding enough time for needed training. Finding time was also a challenge for staff, specifically related service providers, who might provide additional training to other campus staff. For example, an LSSP noted, “Even if they said they would allow is to do the training there wouldn’t be time.” Finally, focus group participants described the impact that district financial constraints have had to limit professional development opportunities.

### ***Content of Recent Professional Learning Sessions***

The Special Education Department provided a list of professional learning topics for district training covered in 2020-2021 (see list below). Topics were differentiated by role. For administrators, topics covered most aspects of special education service provision, from an overview of special education requirements with respect to referral and eligibility, to least restrictive environments (LRE), roles and responsibilities accountability, parent’s rights, instruction and program standards including administrator’s role as instructional leader, inclusive practices, behavior discipline, and students’ rights. The focus of the sessions was to build a common knowledge base among administrators. Interwoven with these topics was developing an understanding of shifts in special education, specifically about what is “best” for students. District leaders and campus personnel acknowledged a need to build a baseline understanding among staff at all levels. An administrator explained, “We don’t have a baseline skill set for all our teachers—our teachers range from needing a lot of support to a little support.”

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<sup>118</sup> Reviewing the evidence on how teacher professional development affects student achievement. Issues & Answers. REL 2007-No. 033. Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance, Southwest Regional Educational Laboratory, October 2007. Findings based on nine studies that meet What Works Clearinghouse standards.

**GISD Draft Training Plan** (Provided by Department of Special Education)

**Table 7. GISD Training Plan for ADs and Principals**

| Topic                                | Subtopics   |
|--------------------------------------|---|
| 1. Child Find, Referral, Eligibility | <ul style="list-style-type: none"> <li>• IDEA and the purpose of the IEP</li> <li>• Disability and reframing what is in the “best interest” of students</li> <li>• SST Process</li> <li>• Inclusion as the standard</li> <li>• Roles</li> <li>• Accountability – To IDEA and Texas State Law</li> <li>• The why of IDEA</li> <li>• Due Process for students/families</li> </ul>   |
| 2. LRE                               | <ul style="list-style-type: none"> <li>• Programming and placement</li> <li>• Continuum of services</li> <li>• Roles and Responsibilities</li> <li>• Accountability</li> </ul>  |
| 3. The IEP and the Principal’s Role  | <ul style="list-style-type: none"> <li>• ARD Committee Process Dos and Don’ts</li> <li>• Diagnostician Role</li> <li>• Special Education Teacher Role</li> </ul>  |
| 4. Parents Rights                    | <ul style="list-style-type: none"> <li>• Informed consent</li> <li>• Participation</li> <li>• Records</li> </ul>  |
| 5. Special Education Instruction     | <ul style="list-style-type: none"> <li>• Implementation of the IEP</li> <li>• Specially Designed Instruction</li> <li>• Principal’s Role as Instructional Leader</li> <li>• Progress Monitoring and Documentation</li> </ul>  |
| 6. Program Standards                 | <ul style="list-style-type: none"> <li>• ECSE - Principal Meetings               <ul style="list-style-type: none"> <li>○ Schedules</li> <li>○ Assessment</li> <li>○ Instruction</li> <li>○ Classroom Structure</li> <li>○ Behavior</li> <li>○ Literacy/Language Immersion</li> <li>○ Use of Visuals/Communication</li> </ul> </li> <li>• ALE-Principal Meetings</li> <li>• BA/ABC-Principal Meetings</li> <li>• RES/INCL-Principal Meetings</li> </ul> |
| 7. Inclusive Practices               | <ul style="list-style-type: none"> <li>• Specially Designed Instruction</li> <li>• Scheduling for Intervention</li> <li>• Reframing what is “best” for students</li> </ul>  |
| 8. Behavior and Discipline           | <ul style="list-style-type: none"> <li>• Social Emotional Programming               <ul style="list-style-type: none"> <li>○ De-Escalation</li> <li>○ Teaching Replacement Behaviors</li> <li>○ Campus Support Process</li> </ul> </li> <li>• Manifestation Determination</li> <li>• Student Removal</li> </ul>   |

Parental/Students Rights

- Reframing

**Table 8. GISD Training Plan for Teachers**

| Topic   |
|---|
| 1. ECSE/ALE Schedules: Staff, Students, and Classroom |
| 2. Writing Legally Compliant IEPs                     |
| 3. Specially Designed Instruction                     |
| 4. What to Do When Parents Disagree                   |
| 5. Facilitating a Great IEP Meeting                   |

### ***Areas of Need for Professional Development***

There was an overall perception that GISD staff at all levels, in both special education and general education, require additional training, and that some district-provided professional learning is misaligned to educator needs. For example, several school-based special education teachers described attending the mandated, annual professional learning designed for general education teachers before school. The content, they reported, was the same each year, and was not targeted at the student population they serve. Teachers noted that in cases where specialized content was provided to special educators during the mandated PD, it was determined at the school level through the initiative of campus leadership.

The misalignment was also perceived at the system level. Many teachers and administrators referenced training on a co-teaching and inclusion model provided by an outside organization, Stetson and Associates, Inc., but explained that they were unable to implement most of the practices in the training due to staffing and scheduling issues. They noted there was limited support and unclear expectations regarding implementation.

Staff survey results from 2019 (see Section VII) show that a large proportion of campus administrators and campus instructional staff (30-40%) disagreed with statements that special education department staff provide appropriate training to support special education student services, the usefulness of those trainings, and whether the department has provided sufficient training to campus staff handle their responsibilities related to special education students, with another 20-40% responding that they were neutral/not sure.

Focus group participants noted different gaps in knowledge among new teachers, general education teachers, special education teachers, paras and aides and suggested differentiated professional learning based on the following needs:

- **Understanding of IEP development, implementation and use of data.** General education teachers noted that it would be useful to spend some of their pre-school professional learning time collaborating with special education teachers around student IEPs. Many staff noted that they would like more context and discussion about each -- while they are provided with information about modifications or accommodations—they indicated that knowing student diagnoses or history would help them serve their students better. GISD staff noted that in the district overall, they needed to build greater knowledge of legal requirements, as well as documentation of student progress and the use of data in determining student placements, goals, accommodations, and modifications. As one district staff member said “leadership needs to be more intrusive. We really need to go back to basics” to ensure that instructional decisions, targets and progress monitoring are based on systematically collected data.
- **Differentiation and implementation of accommodations and modifications.** General education teachers and special education teachers agreed that general education teachers need more support and training on how to use the materials that special education teachers provide (or how to create the materials on their own) and how to make accommodations work in the classroom.

For new teachers, focus group participants indicated that additional training on how to implement accommodations and what they should look like in the classroom was needed in addition to overall training on special education. General education teachers also requested support with grading for students who are moving in and out of their classroom for pull-out support.

- **Strategies to address behavior and socio-emotional learning.** Some staff noted that coaches and other special education teachers provide useful support around managing challenging student behaviors and socioemotional learning, but that across the board more support and training are needed.
- **Exemplary Implementation Models:** Staff identified a need to see more examples of exemplary practice that demonstrate high expectations and effective implementation. They noted that the Director created a mechanism to share best practice and what works within the district through a centralized form that staff may complete.
- **Technology and use of district systems.** School-based staff noted multiple systems within GISD that require data entry related to services for students with IEPs (e.g., XLogs, eSPED) and a lack of systematic training for all staff who need to develop proficiency with those systems and data reports.
- **Training for paras and aides.** Teachers, administrators, and parents noted that while paras and aides provide direct support to students, they are not uniformly included in district- and campus-based professional learning. Staff in these roles should also receive professional development, as appropriate, to support their professional growth in their work with students.

## Summary and Implications

Over the past several years, GISD has experienced significant organizational shifts, and important changes within its special education department. This past year has been no exception with significant shifts in district leadership in just the past several months.

Under the current structure, GISD's staffing falls in the middle to bottom third among comparison districts in most personnel categories (special education teachers, related service providers, paras) except psychologists and nurses. That is, approximately 50-60% of districts had smaller student-special education professional ratios than GISD. As noted elsewhere, GISD's employs a cadre of Diagnosticians who fulfill the role that psychologists play in other districts, thus reducing their need for the position. Parents perceived the staffing to be adequate to implement student's IEPs.

District focus group and interview participants characterized professional learning in GISD as both abundant and lacking. There are many opportunities for staff to improve their practice and keep up with new developments in the field. However, they are often used to deliver similar content each year and are often not differentiated to staff role and existing skillset. The district is moving towards gaining a better handle on staff needs through internal data gathering through its staff surveys and this review. Recommendations below will help GISD frame a staged response to staffing needs focused on system-wide coherence and building baseline knowledge.

Over the course of the next school year, GISD will have a new (or interim), Chief Academic Officer and a new Executive Director of Special Education as well as a new Assistant Director. These changes in key leadership positions provide GISD an opportunity to establish a new strategic direction for the Department of Special Education to optimize its organizational staffing and professional learning to support strategic initiatives.

## VII. SYSTEMS AND STRUCTURES

This section provides information about the systems and structures within GISD and how they are organized to support the teaching and learning of students with disabilities. The section is organized in the following manner: 1) Organization and Vision, 2) Support to Schools, 3) Data and Technology Use, 4) Standard Operating Procedures, 5) Resource Allocation, and 6) Summary and Implications.

### Organization and Vision

#### *District Strategic Plan*

The overall mission of GISD is “to provide an exceptional education to all its students.” Accompanying the district mission statement is a vision statement and five student-centered value statements.

**Exhibit 89. GISD Mission, Vision, Values**

The graphic is composed of several colored rectangular blocks. At the top left is a pink block with the word 'Vision' written vertically in large, light pink letters. To its right is a blue block with the word 'Mission' written horizontally in large, light blue letters. Below the pink block is a white block with the GISD logo (a torch) and the letters 'GISD'. Below the blue block is a white block containing the mission statement. Below these are five smaller colored blocks (blue, orange, green, purple, and red) each containing a value statement. At the bottom of the graphic is a large, grey, cursive-style text that reads 'Education transforms lives.'

**Vision**  
Reaching the future by driving excellence, one student at a time.

**Mission**  
The Garland Independent School District exists as a diverse community with a shared vision that serves to provide an exceptional education to all its students.

**Values**

- We believe every student can learn.
- We know every student deserves our best.
- We value and celebrate all cultures.
- We respect all students, families, staff and communities.
- We demonstrate ethical behavior.

*Education transforms lives.*

GISD adopted the following goal statement to guide the District’s One Goal, One Focus strategic plan through 2024-25: “Garland ISD will ensure ALL students graduate prepared for college, careers and life by increasing student performance measures, postsecondary readiness, and graduation rates and decreasing

student management incidences.” To achieve this goal, the district identified ten objectives and indicators, outlined in the table below.

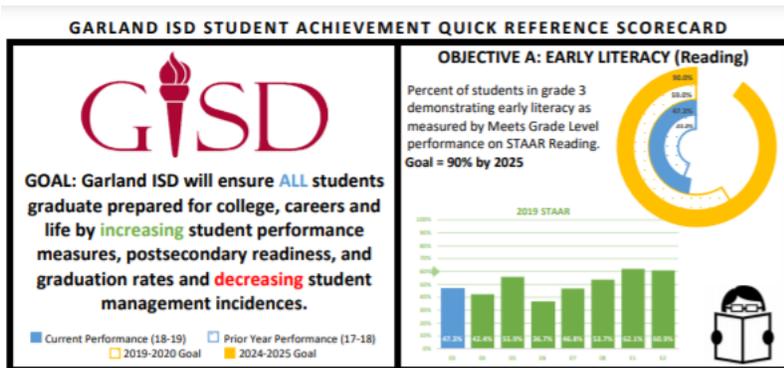
**Table 9. GISD Strategic Objectives and Indicators**

| Objective                              | Indicator  |
|--|--|
| A: Early Literacy (Reading)            | 90 percent of students in grade 3 will demonstrate early literacy as measured by Meets Grade Level performance on STAAR Reading.   |
| B: Early Literacy (Writing)            | 70 percent of students in grade 4 will demonstrate early literacy as measured by Meets Grade Level performance on STAAR Writing.   |
| C: English Language Acquisition        | 76 percent of ELL students will demonstrate English language acquisition, as measured by yearly progress indicator on the Texas English Language Proficiency Assessment System (TELPAS). |
| D: Scientific Understanding            | 80 percent of students in grade 8 will demonstrate scientific understanding as measured by Meets Grade Level performance on STAAR Science.   |
| E: Mathematical Proficiency            | 90 percent of students will demonstrate mathematical proficiency as measured by Meets Grade Level Performance by the end of grade 9 on STAAR Algebra I EOC.                              |
| F: Postsecondary Readiness (SAT Exams) | 70 percent of students will demonstrate postsecondary readiness exam success (reading and writing)   |
| G: Postsecondary Readiness (AP Exams)  | 45 percent of students will demonstrate postsecondary readiness exam success, as measure by AP exams with qualifying criterion scores.   |
| H: Student Management                  | 35 percent of discretionary exclusionary consequences as measured by ISS, OSS, and DAEP.   |
| I: Graduation Outcomes                 | 95 percent of students will successfully complete graduation and College, Career, Military Ready (CCM-R) requirements.   |

Achievement on the objectives is monitored and reportedly annually through a quick reference scorecard available on the Strategic Goal website.<sup>119</sup> The quick reference scorecard includes data on performance for the prior year, current year, upcoming school year goal, and the overall goal.

<sup>119</sup> Quick Reference Scorecard for 2019 available at: <https://www.garlandisd.net/file/11824>

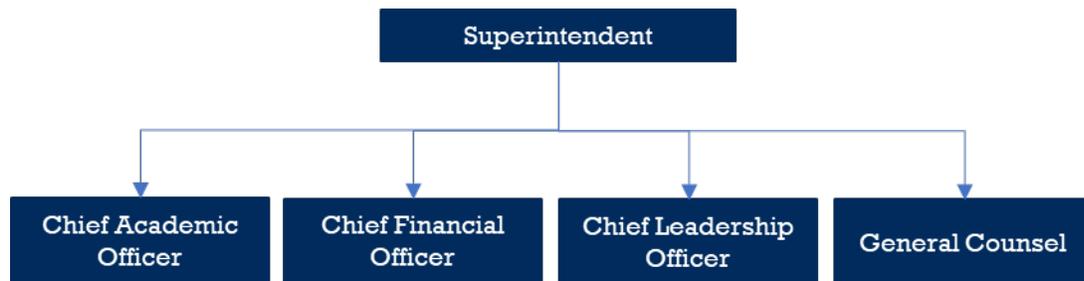
Exhibit 90. GISD Student Achievement Quick Reference Scorecard Sample, 2019



### District Leadership

GISD is currently led by an appointed superintendent under the direction of seven trustees who are elected to three-year terms on the Board of Trustees. The current superintendent began leading the district in January 2018. Since his arrival, the superintendent brought increased awareness and services for special education and dyslexic students. Focus group participants were encouraged by the support the superintendent has brought for ensuring the success of students with disabilities. Recently, the Board of Trustees renewed the superintendent’s contract for another five-year term.

Exhibit 91. GISD Superintendent’s Office



The Chief Academic Officer provides leadership to the following departments: Curriculum and Instruction, Special Education, Career and Technical Education, Guidance and Counseling, Office of Innovation, Grants, and Research, Assessment, and Accountability.

The Chief Leadership Officer oversees the following departments which intersect with special education programming: Human Resources, Athletics, Communications & Public Relations, Student Services, Health Services, Visual and Performing Arts, and Campus Leadership.

### School Leadership and Site-Based Management

Under the supervision of the Chief Leadership Officer, Area Directors provide primary supervision of campus principals. Currently, five Area Directors oversee the district’s campuses and leaders. GISD operates under a site-based management (SBM) philosophy whereby campuses, and their respective building principals, have significant budgetary and programmatic autonomy, including for special education. Historically in the United States, SBM has aimed to involve parents and teachers in decision making; improve decisions through devolution from central office to the campus and increase job satisfaction and professionalization of teachers and enhance student performance.<sup>120</sup> Under this model, principals are given autonomy on the hiring of school employees, the development of school-based programs, and budgeting –

<sup>120</sup> Guerra, Jackson, Madsen, Thompson, & Ward, 1992.

including, to some extent, the spending of special education dollars, and are held accountable for successfully meeting goals and objectives. SBM appears to be a relatively ingrained, and historic, tenet of GISD's operations and management structure.

Both in GISD, as well as nationally, one of the greatest tension-points between SBM and central office administrators often happens at the school level. On one side, school leaders want support from the central office on program, policy, and compliance matters. On the other side, these same leaders want to maintain their autonomy to deliver an instructional program to meet the needs of students within their buildings. To compound matters, many of the school leaders charged with making site-based special education decisions often lack any formal special education training or special education credentialing. Throughout the literature, it has been noted that SBM and special education policies have fundamentally different assumptions. SBM assumes local school autonomy while special education policies were "constructed with traditional governance and bureaucratic assumptions for top-down control, tight coupling, and accountability."<sup>121</sup> Striking the right balance between school autonomy and effective accountability measures is complex work.

These conflicting assumptions exist in GISD and manifest in various ways. Most focus group participants, representing staff at various levels and positions, expressed concern about the unintended consequences of a decentralized system of schools with the autonomy to select their own methods and resources for providing special education services and instruction in core content areas. Focus group participants indicated that most administrators are not well versed in special education law and end up relying on what they think they know. Regarding decision-making, a lack of district accountability has led to decisions that placate principals rather than focusing on best practices and alignment with IDEA law. Focus group participants indicated a lack of a consistent special education vision and framework that also led to inconsistencies in practice. Limited training for principals and area directors on special education law and policies in the past has been seen as an area of concern for focus group participants. Overall, participants worried that the result of this level of local control had caused inequities, inefficiencies, and inconsistency of services across schools.

### ***School Improvement Plans***

Each campus creates an improvement plan generated through a school-based improvement planning tool. All improvement plans include a campus-based mission statement, vision statement(s), and performance objectives that align to the district's "One Goal, One Strategy" plan. The goal and performance objectives are verbatim to what is included in the "One Goal, One Strategy" plan; however, the interim metrics are established by the campus based on their baseline data and the target performance. The campus improvement plans do not include any goals specific to special education programming and services.

### ***Department of Special Education***

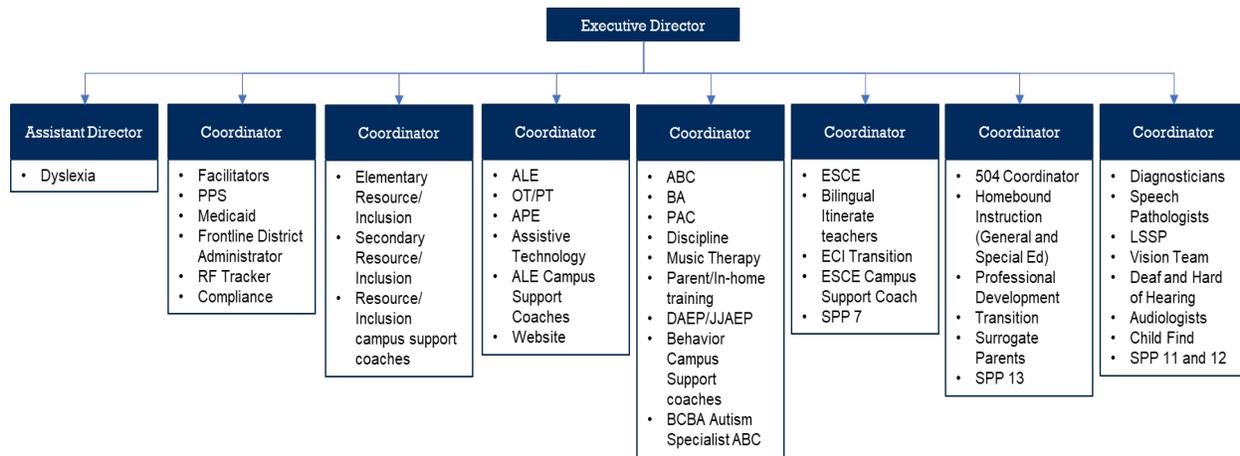
Special education is one of seven departments under the leadership of the Chief Academic Officer. The Department of Special Education currently does not have a mission, vision, or value statement(s) that align with the overall district mission and vision. Throughout focus groups and interviews, participants frequently mentioned the absence of a district vision and framework for special education being a concern, especially in how to hold campus leaders and other school staff accountable.

During the 2020-21 school year, the Department was led by an Executive Director with the support of an assistant director and seven coordinators who oversee various functions of the department and provide support to schools.

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<sup>121</sup> Marshall, C. and Patterson, I. (2002). 'Confounded policies: Implementing site-based management and special education policy reforms.' *Educational Policy*, 16(3), 351—86.

**Exhibit 92. 2021-22 Department of Special Education Organization**



In 2020, upon the departure of the previous executive director, GISD conducted a national search to find an executive director who could provide strategic leadership in helping to transform the department. The district's efforts to conduct a national search was driven primarily from feedback they received regarding the inability of prior leaders to build coalitions amongst the campuses and drive critical change efforts. After an exhaustive search, a final candidate was selected and began in the role October 2020. District leaders believed the new executive director's experience and leadership style were the ideal fit to help transform the department. In June 2021, the recently hired candidate resigned from the executive director position and a current GISD leadership staff member was appointed as interim executive director. This interim executive director has served as a coordinator in the department of special education and worked in the district for over 20 years.

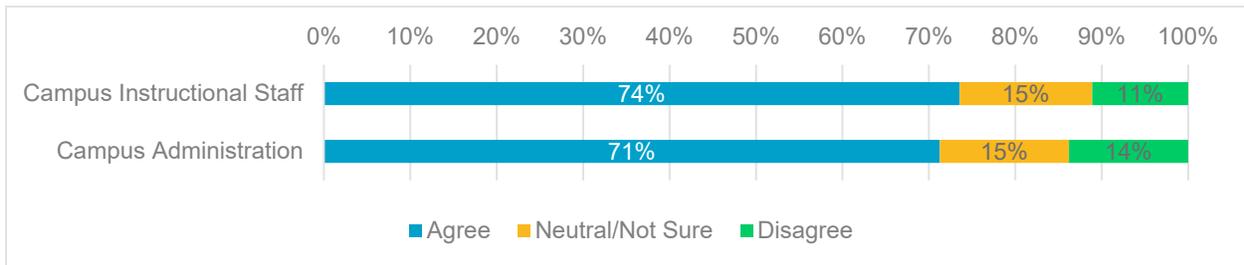
**2019 Climate Survey**

In March 2019, GISD conducted a climate survey for the Department of Special Education. The twenty-two item survey was administered to campus instructional staff, campus administrators, and department staff. Survey questions were related to the department's responsiveness, the value of resources and support made available, and the department's overall effectiveness. While the survey items were the same for each group, the responses between campus instructional staff and campus administration highlighted the different experiences between roles. Overall, campus instructional staff were slightly more positive about their experiences with the Special Education Department compared to administrators. Responses to survey items categories in the following themes are summarized below: Support to Schools, Training, Communication, and Overall Effectiveness.

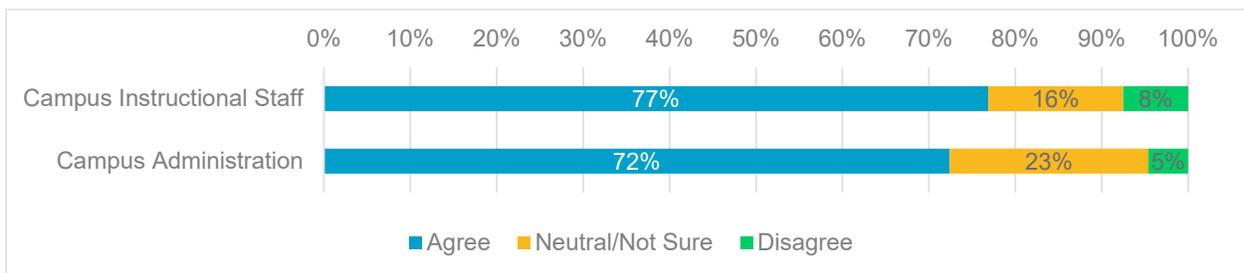
**Support to Schools**

According to results from the survey, a large majority of campus instructional staff (74%) and campus administration (71%) find the special education department staff to be professional, courteous, and respectful. Additionally, a large majority of campus instructional staff (77%) and campus administration (72%) indicated they believed special education department staff are knowledgeable about special education.

**Exhibit 93. Climate Survey: SPED department staff are professional, courteous and respectful.**

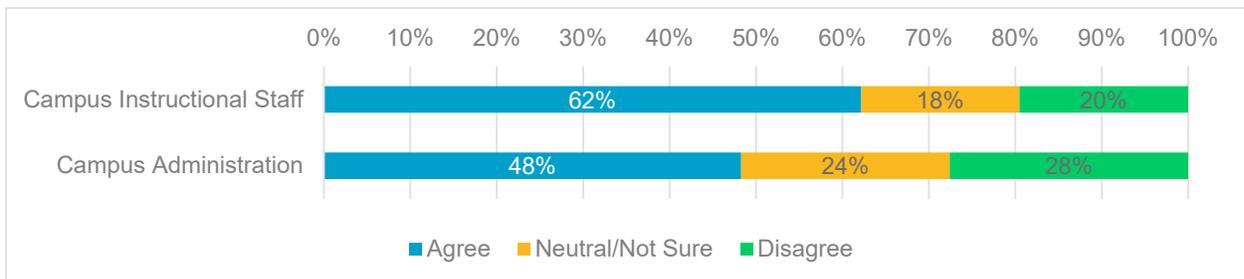


**Exhibit 94. Climate Survey: SPED department staff are knowledgeable about Special Education.**



Sixty-two percent of campus instructional staff believed the special education department staff are willing and able to provide support. Twenty-eight percent of campus administrators disagreed, compared to twenty percent of campus instruction staff.

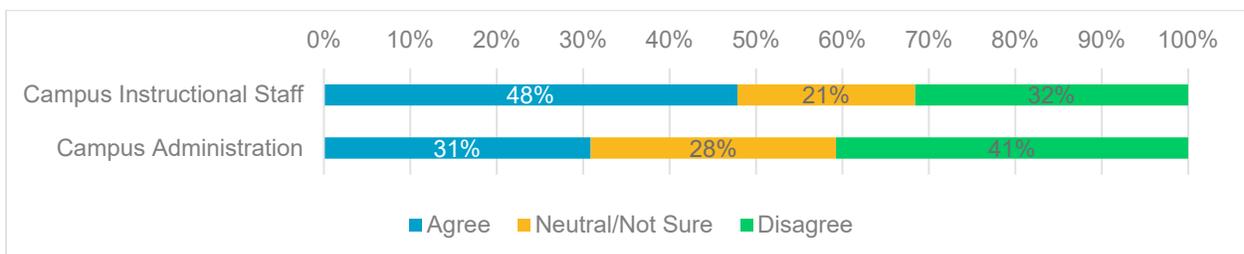
**Exhibit 95. Climate Survey: SPED department staff are willing and able to provide support.**



### Training

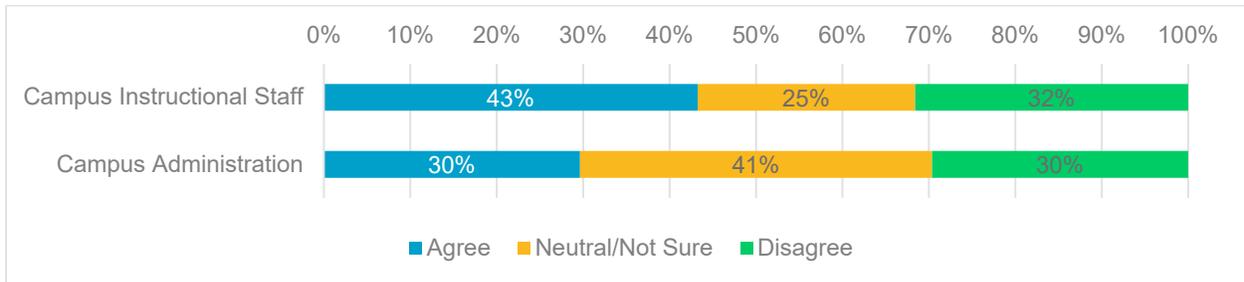
While 48 percent of campus instructional staff agreed that special education department staff provide appropriate training to support special education student services, 32 percent disagreed, and 41 percent of campus administrators disagreed.

**Exhibit 96. Climate Survey: SPED department staff provide appropriate training to support special education student services.**



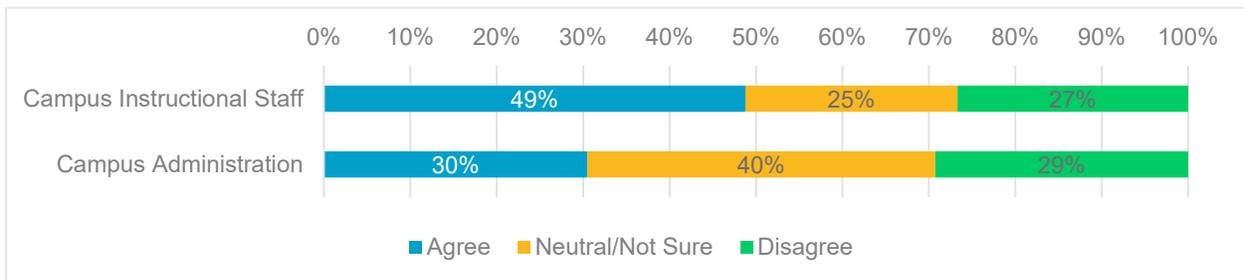
Thirty-two percent of campus instructional staff disagreed that special education department trainings are of high quality and useful, while 41 percent of campus administration was not sure/ neutral.

**Exhibit 97. Climate Survey: SPED department trainings are of high quality and useful to me.**



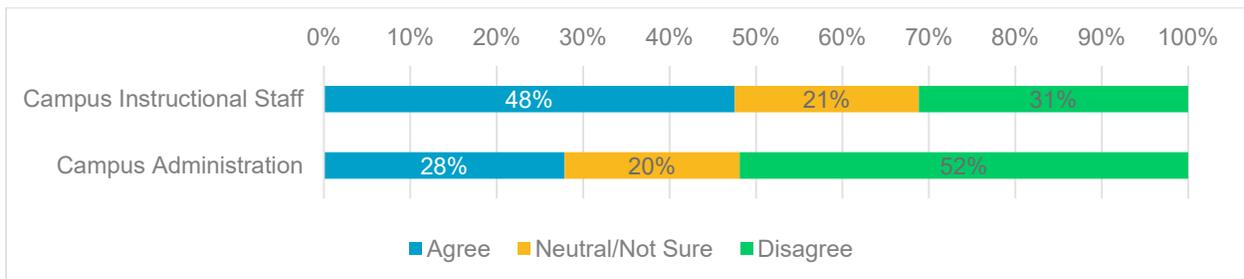
Similarly, 27 percent of campus instructional staff disagreed that special education department staff have provided sufficient training to handle their responsibilities related to special education students, while 40 percent of campus administrators were not sure/ neutral.

**Exhibit 98. Climate Survey: SPED department staff have provided sufficient training to handle my responsibilities related to special education students.**



While 48 percent of campus instructional staff agreed that special education department processes and procedures support efficient work on behalf of educators, students and families, a majority (52 percent) of campus administrators disagreed.

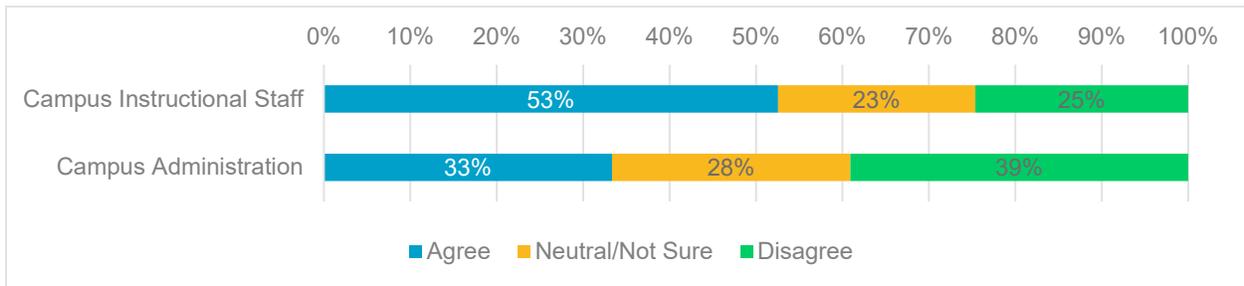
**Exhibit 99. Climate Survey: SPED department processes and procedures support efficient work on behalf of educators, students and families.**



**Communication**

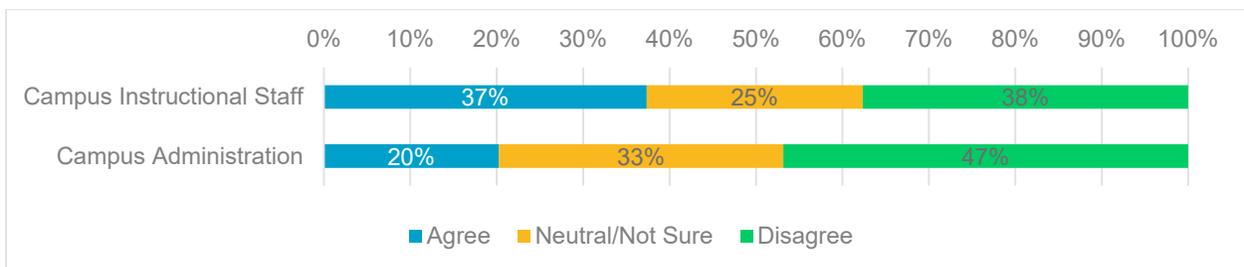
Fifty-three percent of campus instructional staff agreed that special education department staff respond promptly to calls and/or emails, while 39 percent of campus administrators disagreed.

**Exhibit 100. Climate Survey: SPED department staff respond promptly to calls and/or emails.**



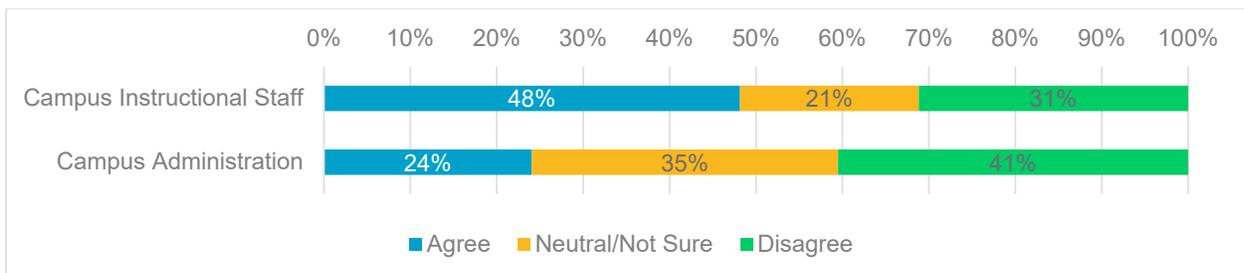
Thirty-eight percent of campus instructional staff and 47 percent of campus administration disagreed that special education department information flows effectively from executive director to staff.

**Exhibit 101. Climate Survey: SPED department information flows effectively from executive director to staff.**



Thirty-one percent of campus instructional staff and 41 percent of campus administrators disagreed that special education department staff clearly communication expectations related to processes and procedures.

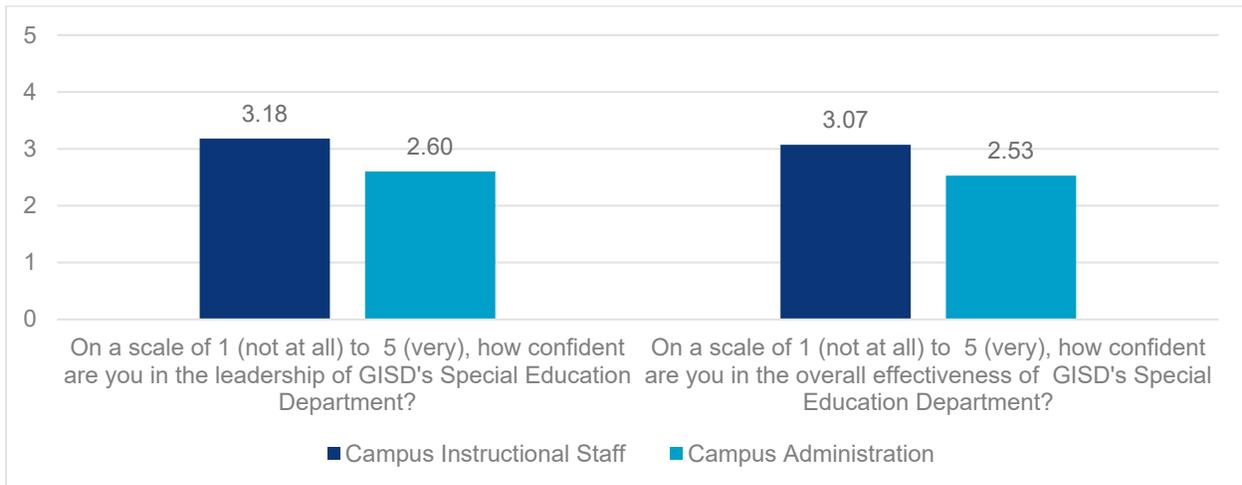
**Exhibit 102. Climate Survey: SPED department staff clearly communicate expectations related to processes and procedures.**



**Overall Effectiveness**

When participants were asked to rate their confidence in the leadership of the special education department and the overall effectiveness of the special education department, campus administrators were less confident than campus instructional staff. The average confidence rating from campus administration for GISD’s special education department leadership was 2.6, while the confidence rating for the overall effectiveness of GISD’s special education department was 2.53. Campus instructional staff gave an average confidence rating of 3.18 for the leadership of the special education department, and a confidence rating of 3.07 for the overall effectiveness of the special education department.

**Exhibit 103. Climate Survey: Confidence in Leadership of Special Education Department and Overall Effectiveness**



Focus groups and interview participants described the historical relationship between the Department of Special Education and campuses. Participants indicated the Department was viewed negatively and lacked respect among campuses for the services and support they provided. Participants indicated that prior leadership took a hands-off approach with the campuses. Other participants indicated that the Department of Special Education has not received the appropriate support to be successful.

Upon the arrival of in the new executive director in October 2020, the Department shifted in its approach with campuses, positioning itself more as a resource to campuses. As the Department moves forward with new leadership, building relationships with campus administrators will be critical. Similarly, the Department will need to make the professional development of department staff a priority, ensuring that staff are highly skilled and respected among campuses.

## Department Support to Schools

Support from the Department of Special Education to schools is primarily supported through the Special Education Coordinators. A total of seven coordinators provide leadership for the implementation of special education programs which advance achievement for students served through special education. Coordinators support campuses to ensure these students are provided a Free and Appropriate Public Education (FAPE) through individualized education programs. Coordinators collaborate with parents, teachers, principals, and support personnel regarding instructional issues in the area of special education, district-wide initiatives and program requirements.

Coordinators also supervise the following specialists and coaches:

**Behavior Specialist.** The Behavior Specialist (BCBA) works with special education teachers district-wide to develop and implement ABA based-behavior management strategies in classrooms and to provide specific behavior intervention supports to students. Assist campus staff in developing functional behavior assessments. Behavior improvement plans, positive behavior supports, and behavior management plans.

**Campus Support Coach.** The district level Campus Support Coach offers support to special education students by assisting general and special education teachers. Campus Support Coach (district) is available upon request to assist a general or special education teacher.

**A.L.E Campus Support Coaches.** Works with special education teachers in the A.L.E program to support students.

Participants in focus groups and interviews generally acknowledged the lean staffing structure of the department. Some participants had more positive experiences with the department, indicating that the department was overall responsive to campus requests and needs. Others felt that the communication between the special education office and the campus was a pain point. Participants indicated that many of their requests to the department are legal questions and responses lacked specific guidance. In some situations, campus staff indicated they might have to navigate between multiple coordinators, with each coordinator providing different guidance. Participants shared that the siloed nature of the special education department was challenging to navigate.

## Data and Technology Use

Staff in Garland ISD use the following web-based applications to support students with IEPs:

- **Frontline.** Special education case management software to create and store student IEPs.
- **X Logs.** Program designed to collect notes on services delivered to special education students. Service providers have the ability to document services provided each day and submit directly to the vendor for processing.
- **Skyward.** Student information management system.
- **Review 360.** Behavior improvement system

Compliance reports, including timeline reports for initial FIE/ARDs, annual reviews, and reevaluations, are scheduled from Frontline and delivered to each elementary and secondary campus. Special education data audits occur each grading period to verify student enrollment information. Reports are available in a variety of programs used in both general education and special education for student data and progress monitoring.

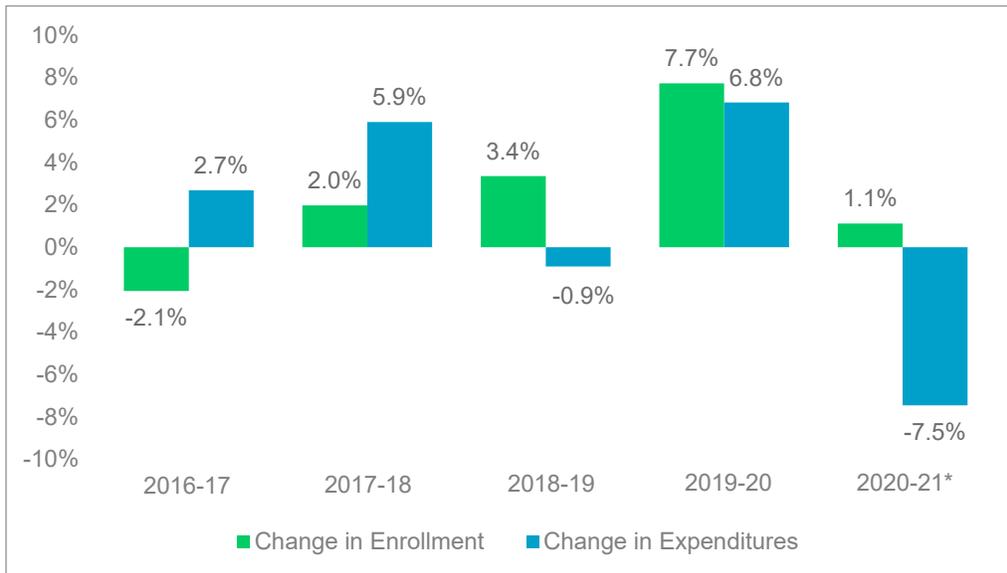
Focus group participants expressed their frustration with using multiple systems to document student progress (X Logs and Frontline). Many participants indicated the frustration they experience with X Logs when data is entered in the system does not save appropriately, or the system crashes, increasing their time for documenting. Participants indicated that X Logs crashes frequently and users experience a lag in the system. A lack of training on the web-based platforms and expectations for use was also expressed.

## Resource Allocation

### *Expenditures and Budget Management*

Nationally, the area of special education regularly experiences expanding costs. As the special education student population increases and needs become more complex, costs rise, far exceeding the state requirements for state spending. Since 2015-16, GISD has experienced a 12.5 percent increase in students who have IEPs. In 2019-20 GISD had a 7.7 percent increase in enrollments of students with disabilities while increasing expenditures 6.8 percent over the prior year. In 2021, the percentage of students with IEPs in GISD increased 1.1 percent from the prior year, with a proposed reduction in special education expenditures of 7.5 percent. As highlighted in the chart below, changes in enrollment have not consistently aligned with changes in expenditures. In 2016-17, for example, GISD experienced a decrease in student enrollment of 2.1 percent; however, it increased special education expenditures 2.7 percent. Between 2016-17 to 2020-21, GISD has had a net increase of 6.5 percent in special education expenditures.

**Exhibit 104. Percent Change in Enrollment in SwDs Compared to Percent Change in Special Education Expenditures, 2016-17 to 2020-21<sup>122</sup>**



Similar to other school districts, payroll is the primary cost driver for GISD. Currently, 95 percent of expenditures in special education are related to payroll. The department of special education currently manages 30 department budgets for programming. One-third of the programming budget is allocated to dyslexia support. Other high-cost areas for the district include maintaining Frontline Education, GISD’s special education database, with a yearly cost of around \$144,000. Additionally, Garland ISD contracts with Mesquite ISD and Dallas ISD for the regional day school for an annual cost of around \$500,000.

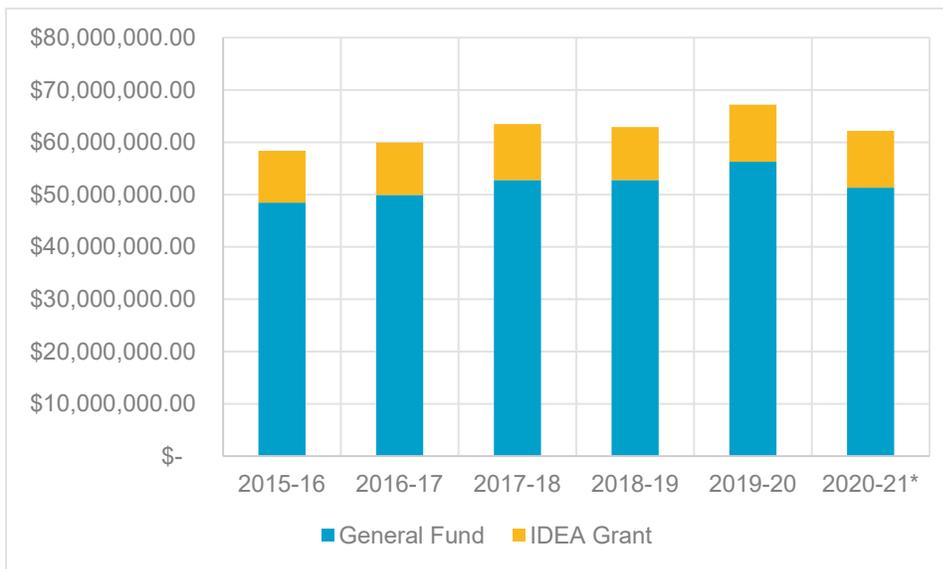
Special education budget management was a concern brought up in focus groups. Participants reported that prior special education department leadership lacked the necessary monitoring processes for the budget and frequently overspent, resulting in increases in general fund allocations to cover the excess. Participants discussed recent efforts to improve the budgeting process, including more communication and interaction with the budgeting department and special education. Specifically, the new Executive Director took a more proactive approach with budget monitoring by including coordinators in the budget monitoring process, building internal controls, establishing meetings, and developing monthly reporting.

### ***IDEA Grant and Medicaid Reimbursement***

The IDEA grant currently funds around 175 positions, including teachers, instructional aides, campus facilitators, and IATs. Grant money is not allocated directly to campuses. With the exception of 2018-19, the grant has increased year over year. In 2018-19 GISD experienced a 5.6 percent decrease in the IDEA grant, attributed to a decrease in enrollment two years prior. Ensuring the grant can sustain positions funded on it is a priority for the district. While the IDEA grant has offset some of the expenditures, the general fund remains the largest revenue source for special education funding. In 2019-20, the general fund covered 84 percent of special education expenditures.

<sup>122</sup> Data obtained through PEIMS Financial Standard Reports available at: <https://tea.texas.gov/finance-and-grants/state-funding/state-funding-reports-and-data/peims-financial-standard-reports>. \*2020-21 expenditures are proposed.

**Exhibit 105. Special Education Expenditures by Funding Source, 2015-16 to 2020-21** <sup>123</sup>



Currently, GISD contracts with MSB for Medicaid and MAC administration. Teachers and service providers document services in XLogs for reimbursement. Money received from reimbursed services goes back into the general fund.

### ***Maintenance of Effort (MOE)***

Maintenance of Effort (MOE) requires local educational agencies (LEAs) to maintain the level of state and local funds they spend to support federal programs from one fiscal year to the next. For districts receiving IDEA Part B grants, the MOE requirement specifies that districts must spend at least the same amount of state and local funds to provide services to students with disabilities that were spent in the previous fiscal year.

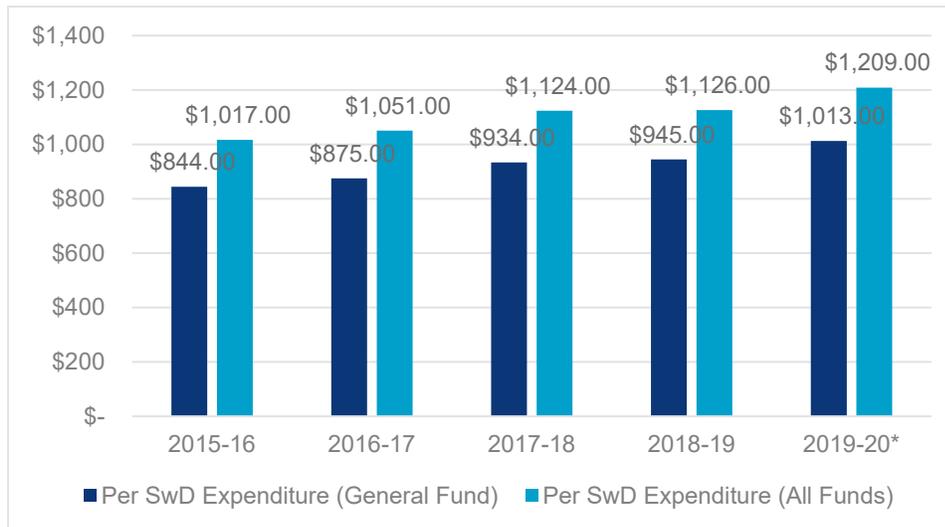
To ensure that LEAs are meeting the MOE requirement and in accordance with Title 34 of the Code of Federal Regulations (34 CFR) 300.203(b), TEA conducts an annual compliance review. The purpose of the review is for TEA to determine if the LEA met the compliance standard by passing at least one of the four following test methods:

- The total amount the LEA expended in local funds must equal or exceed the amount it expended from that source for special education during the preceding fiscal year.
- The total amount the LEA expended in state and local funds must equal or exceed the amount it expended from those sources for special education during the preceding fiscal year.
- The per-capita amount the LEA expended in local funds must equal or exceed the amount it expended per-capita from that source for special education during the preceding fiscal year.
- The per-capita amount the LEA expended in state and local funds must equal or exceed the amount it expended per-capita from those sources for special education during the preceding fiscal year.

GISD has consistently met maintenance of effort requirements established by TEA. Since 2016-16 the amount of expenditures for special education funding per student has increased year over year.

<sup>123</sup> Data obtained through PEIMS Financial Standard Reports available at: <https://tea.texas.gov/finance-and-grants/state-funding/state-funding-reports-and-data/peims-financial-standard-reports>. \*2020-21 expenditures are proposed

**Exhibit 106. Special Education Expenditures per Student, 2015-16 to 2019-20**



### Staffing Allocations

As the overall total number of students enrolled in GISD has declined, enrollment for students with IEPs has increased. Staffing allocations for each school are primarily driven by total district enrollment. Once total staffing needs are identified, school enrollments are taken into consideration for final school-based staff allocations. GISD maintains staffing guidelines for schools to follow for addressing special education staffing needs. The staffing guidelines provide target ratios of students per special education teacher and paraeducator for resource/inclusion and special programs, such as ALE, BA, and ABC.

While the staffing guidelines document provides information on teacher per-pupil ratios, focus group participants expressed concern over staffing and the allocation process. Focus group participants indicated that staffing was a pain point for the district overall. Participants indicated that they believed the total number of staff was insufficient to provide quality services and supports to students, especially with the reported increase in students needing more support. The lack of a clear process that allows for increasing staff to address mid-year increases in enrollment was a specific pain point that was frequently mentioned. This has resulted in special education teachers being re-assigned to cover staffing shortages when enrollments increase in one area, such as a special program, resulting in staffing shortages in other areas, such as resource and inclusion.

While many school-based staff expressed feeling spread too thin, caseloads for Speech Language Pathologists came up as a concern among focus group participants. Some participants reported that caseloads for Speech Language Pathologists were around forty-four students, however, they have seen caseloads as high as 80 students. Under the current model, Speech Language Pathologists serve as the case manager for students who only receive speech services, leading to higher-than-average caseloads.

### Summary and Implications

A strong, cohesive, and effective operational structure for the Department of Special Education is one part of the equation to ensure the needs of students with IEPs are met. An operational structure that has a well-defined mission and vision for special education and communicates that mission and vision effectively to campus leaders and key stakeholders such as parents and families will be well positioned to build a strong foundation of mutual respect and trust. GISD's operational structure for the Department of Special Education currently operates with a lean staff of coordinators who primarily support processes, procedures, compliance, and special programs district-wide, with instructional support for specially designed instruction

being initiated and implemented at the campus level. Under this model, the Department of Special Education is not positioned to lead and support instructional best practices at the campus level to improve outcomes for students with disabilities.

Over the years, trust and respect in the department amongst campus leaders and staff has eroded. The cause of this erosion can be attributed to: 1) a lack of relationships between the department and campus leadership, 2) a strong site-based management model that does not hold principals accountable for improving outcomes for students with disabilities, and 3) a lack of training and support on special education law and best practices for specially designed instruction throughout the district to ensure all personnel in the district understand what is required of them to support students with IEPs. Much of the burden of righting the ship for special education district-wide has been placed with the Department of Special Education. However, because GISD operates as a system of schools and not a school system, campuses and campus leaders have been largely overlooked as contributors to the lack of progress for students with IEPs.

One important first step in ensuring campus leaders and staff are held accountable for department policies and procedures is to update all existing policy and procedure manuals, disseminate those materials through easily accessible document repositories, and provide training and support on the contents of those materials to ensure all area directors, campus leaders, and staff supporting students with IEPs are aware of expectations.

## VIII. FAMILY AND COMMUNITY ENGAGEMENT

This section provides findings and recommendations related to practices for engaging GISD parents, families, and other stakeholders and how those practices are implemented to support the teaching and learning of students with disabilities. The following are the key findings that helped to inform recommendations for strengthening and improving the partnership between home, school, and community – in particular, the partnership between teachers, principals, and parents. The section is organized into the following aspects of parent and family involvement: 1) Parent Training and Resources, 2) Parent Voice, 3) Communication, and 4) Home and School Connection.

### Parent Training and Resources

Parents participating in focus groups indicated that training is a much-needed resource for navigating their students' academic journey. As the district seeks to increase effective parent and family engagement, opportunities for parents to access training should be strengthened and increased. Training, when utilized as an engagement tool, allows the district to keep parents informed about issues such as compliance, procedures, policies, and processes, as well as best practices for supporting student development and growth. Informed parents are effective partners in addressing concerns and challenges the student might be facing. Additionally, training provides a contextual understanding for parents or caregivers to understand decisions that are made for their student's IEP development and implementation.

Based on data collected and a review of open-ended responses on the parent survey, key findings around parent training indicate that training in GISD is:

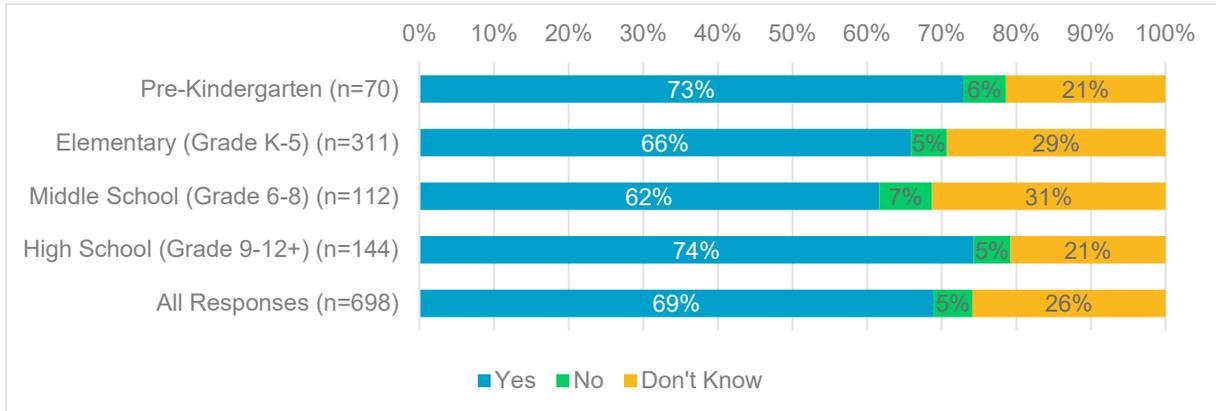
- Viewed as a helpful resource by parents,
- Good quality, informative, and sessions provided have added value to parent understanding,
- Not consistently communicated or shared with all parents of students with an identified disability or who have an IEP,
- Primarily targeting parents of students with autism and is limited to topics that support behavior and advocacy for those students,
- Not available in multiple languages for those parents whose students are English learners or for parents for whom the primary language is not English, and
- Not as frequent as needed due to limited staff or volunteers to provide sessions, as teachers have a large caseload in addition to training responsibilities.

### Parent Survey

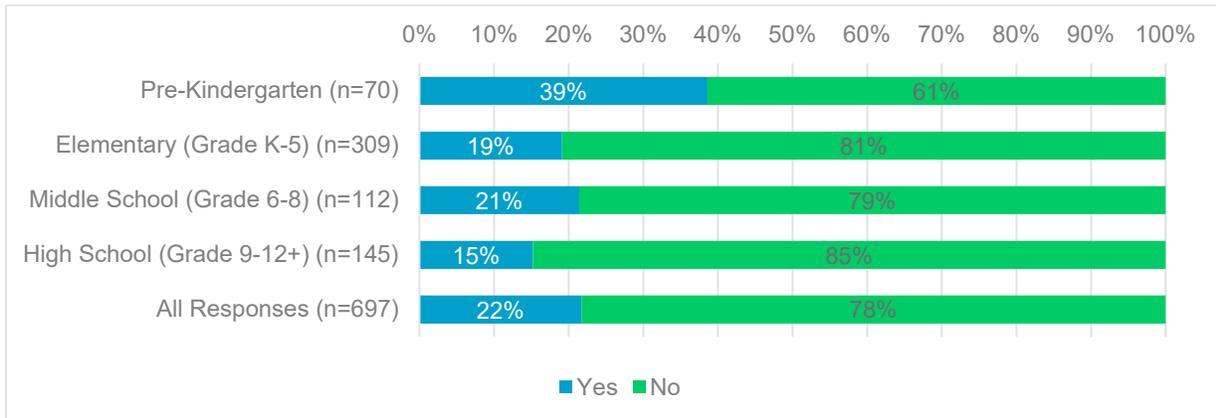
This section analyzes responses to the parent survey that pertain to parent training or information sessions in the following areas: awareness and participation in training or information sessions, satisfaction with current offerings, and opportunities for additional resources and training. Overall, participation in training is low, relative to the number of parents who are aware that trainings are offered.

Of the parents who responded to the survey, 69 percent are aware of opportunities available for parent training or information sessions about special education. While the majority of parents are aware of trainings or information sessions, a small percentage (29%) have attended one within the past year.

**Exhibit 107. Parent Survey: Does GISD offer opportunities for parent training or information sessions about special education?**

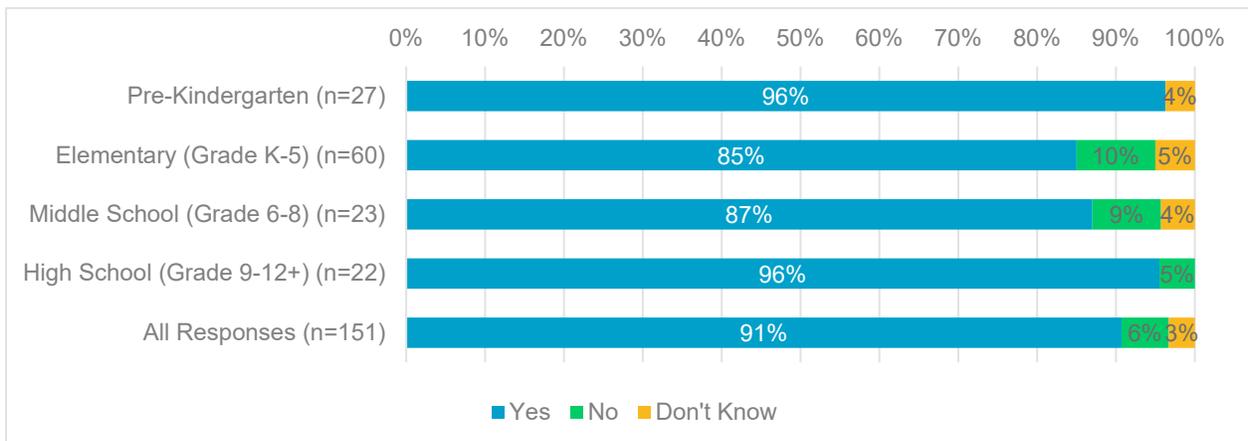


**Exhibit 108. Parent Survey: Have you attended parent trainings or information sessions about special education offered by GISD in the past year?**



Of the parents who indicated they attended a training or information session, an overwhelming majority (91%) indicated the parent training was helpful.

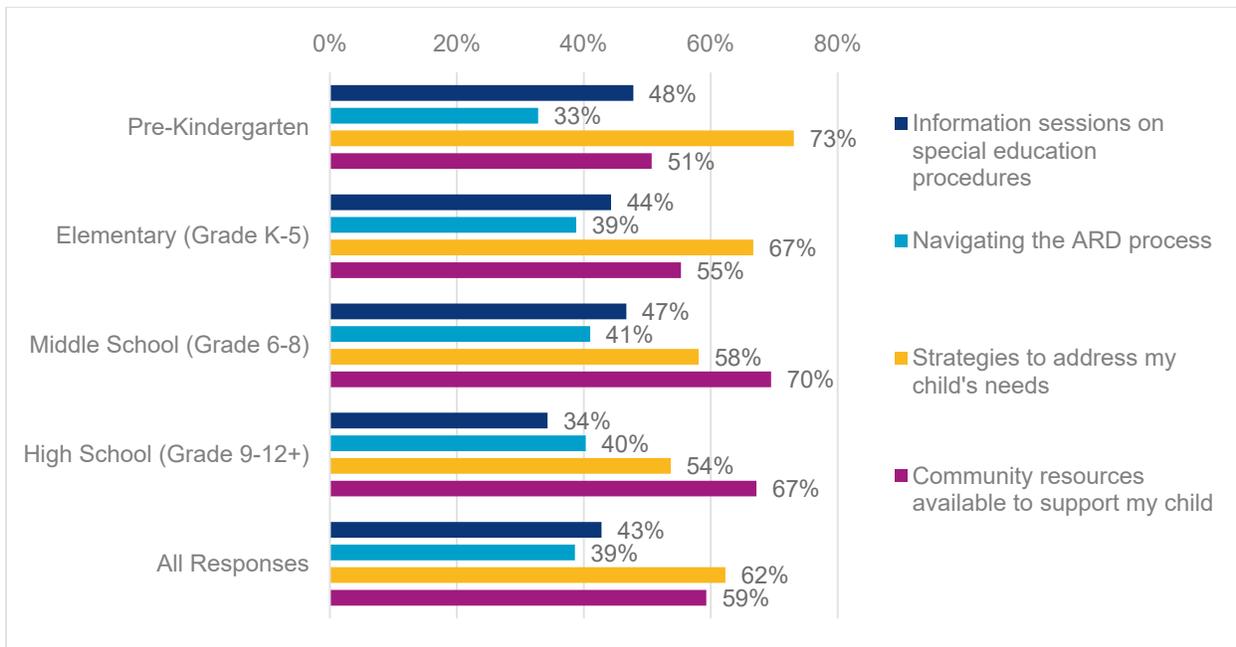
**Exhibit 109. Parent Survey: Was the parent training you attended helpful?**



All respondents were asked to select specific topics that would be most beneficial to parents if additional parent training were offered. The highest rated topics, across all grade levels, were: 1) "strategies to

address my child’s needs”, and 2) “community resources available to support my child.” For pre-kindergarten and elementary grades, the leading topic was “strategies to address my child’s needs” while in the upper grades “community resources available to support my child” was most frequently selected.

**Exhibit 110. Parent Survey: If additional parent training is offered, what specific topics would be most beneficial?**

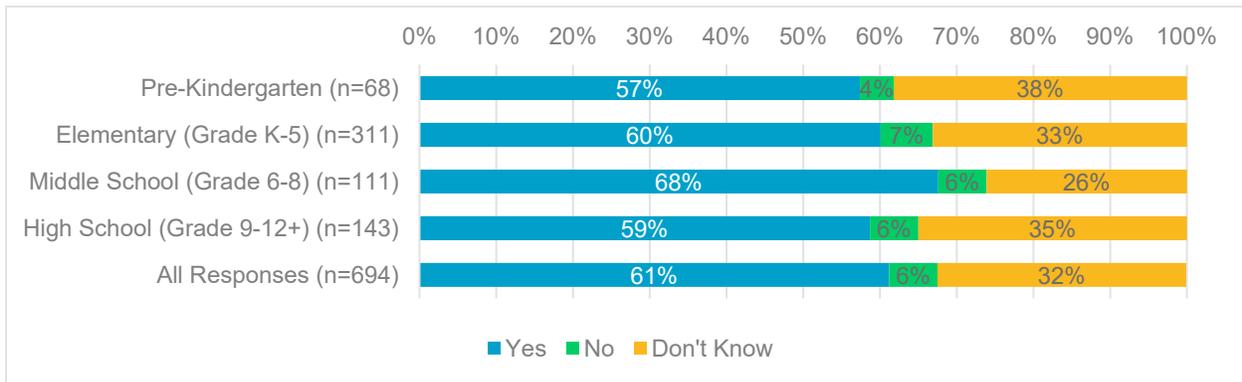


## Parent Voice

The central finding around *parent voice* is that, while GISD does not currently have a structured parent advocacy group that is available to parents of students receiving academic and behavioral supports, parents who were surveyed and those who participated in focus groups were largely in favor of such a group. The included survey is an example of one way to engage parent voice. A parent organization is another way of hearing from parents around ideas, challenges, and concerns related to their students.

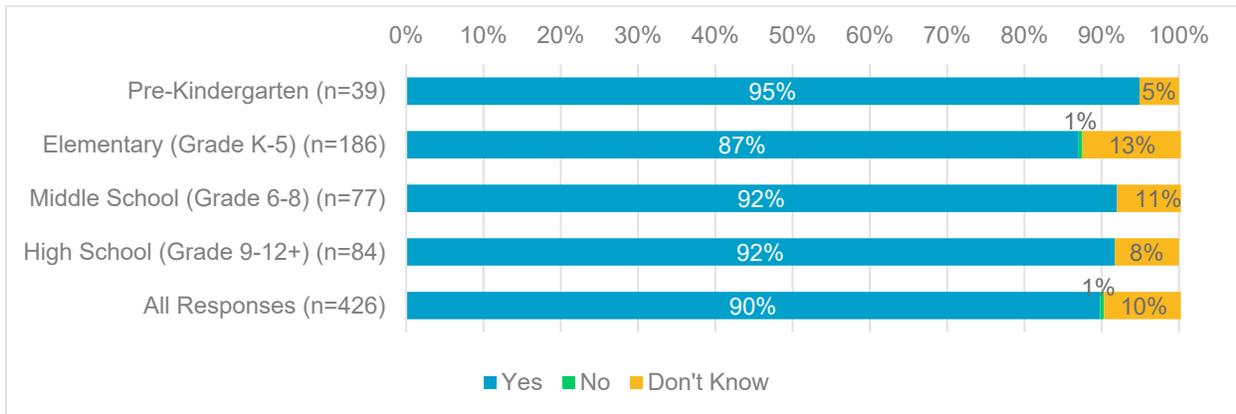
As part of the recent survey, parents were asked about whether they thought a special education parent organization should be created. Overall 61 percent of parents believed a parent organization should be created, while 32 percent did not know. A slightly larger percentage of parents of students in middle school believed that a parent organization should be created.

**Exhibit 111. Parent Survey: Do you think a special education parent organization should be created?**



For parents who believed a parent organization should be created, 90 percent indicated they would be interested in either attending meetings or participating.

**Exhibit 112. Parent Survey: If a special education parent organization was created, would you be interested in attending meetings or participating?**



## Student Support

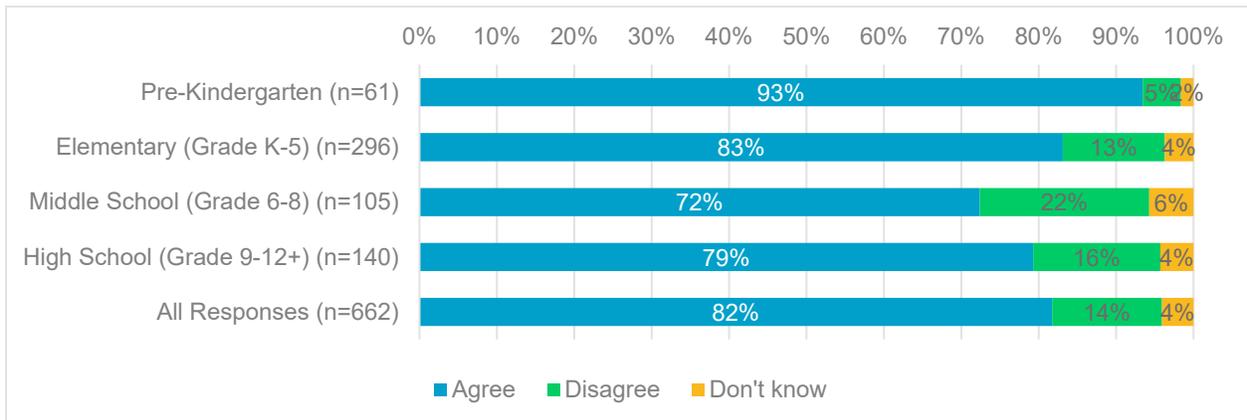
As with communication, parents surveyed as to their overall satisfaction with district academic and behavioral support services responded positively, but, similarly, open-ended responses indicated some areas of concern:

- Instances of their students being bullied with little support from school administration, and
- Parents being told that their student is being moved to another school without consideration on short notice or without consideration for the impact on the family resources.

### Parent Survey

Of the parents who responded to the survey, 82 percent agreed that they were satisfied with their child's overall special education services. Similar to other survey questions, the percentage of parents of children in middle school who agreed (72%) was ten percentage points lower than the overall average.

**Exhibit 113. Parent Survey: I am satisfied with my child’s overall special education services.**



## Communication

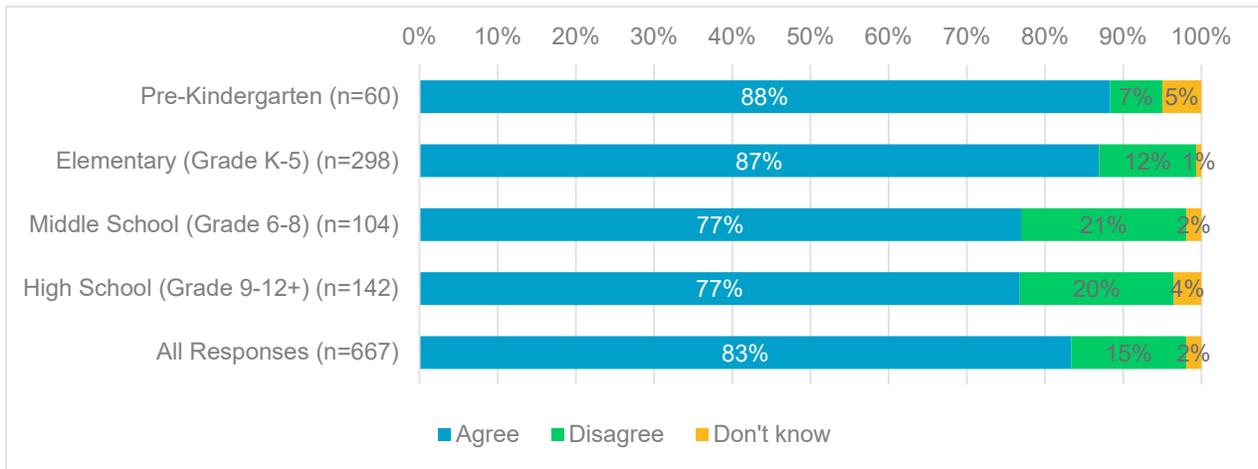
Effective communication is critical to the success of each student, engagement with parents and families, increasing parent involvement, and providing equitable access for students and parents alike. District communication received positive comments from parents across multiple platforms for feedback. Survey respondents and focus group participants cited the website, which is available in multiple languages, as a means of accessing information. The monthly newsletter and active Facebook account for the district were also mentioned as sources of current information. However, participants noted the lack of translation of other communication materials, such as classroom assignments, as well as frustration from some staff that translating materials to share with parents took significant time. One particular concern around communication is the method in which parents and families are informed about decisions related to the movement of students and special education programs. Parents noted implications for continuity of instructional quality, relationships with teachers, and consistency of teacher communication high priorities that must be at the forefront of parent engagement prior to moving a student or a special education program.

Supporting educational equity is a motivating factor in looking at communication with parents and caregivers for students with disabilities. There is an increased need for building the advocacy capacity for these parents and for meaningful partnership between parents and GISD staff. Inconsistencies in communication frequency, distribution method, and access to translated materials have contributed to inequities in providing access to general curriculum and activities. In meeting with parents and other stakeholders, there were several mentions of parents not receiving information about sports, school events, or other activities that were made available to students in general education programming.

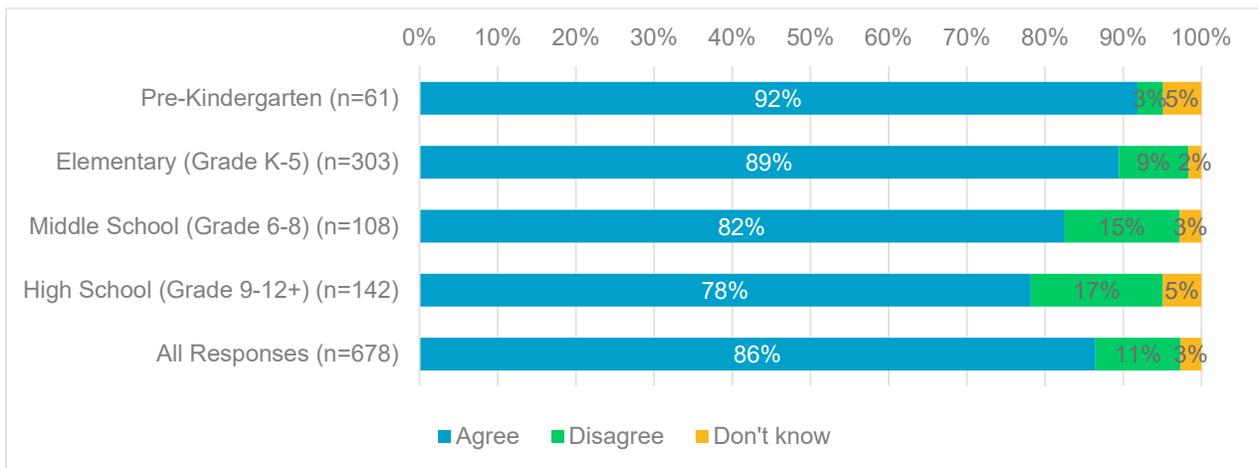
### Parent Survey

When asked about the quality and timeliness of communication parents received from teachers, 83 percent agreed that teachers communicate well with them, and 86 percent agreed that teachers respond to their concerns within a reasonable amount of time.

**Exhibit 114. Parent Survey: Teachers communicate well with me.**



**Exhibit 115. Parent Survey: Teachers respond to my concerns within a reasonable time.**



Of parents who responded to the survey, the majority provided positive feedback on teacher communication; however, open-ended responses provided additional insight into the following challenges:

- Challenges of receiving consistent communication when students changed to a different teacher or school and communication practices differed
- Challenges of having communication that was written or translated in a language other than English and of accessing translation resources available from the district
- Adverse effect of COVID-19 safety precautions and protocols on teacher communication and parent's access to the classroom.

## Home and School Connection

As advocates and partners for their student's learning and growth, parents and families contribute significantly to their students' positive experiences in the classroom. Furthermore, there are opportunities to connect those to practices and activities that build skills at home and as they engage in their community.

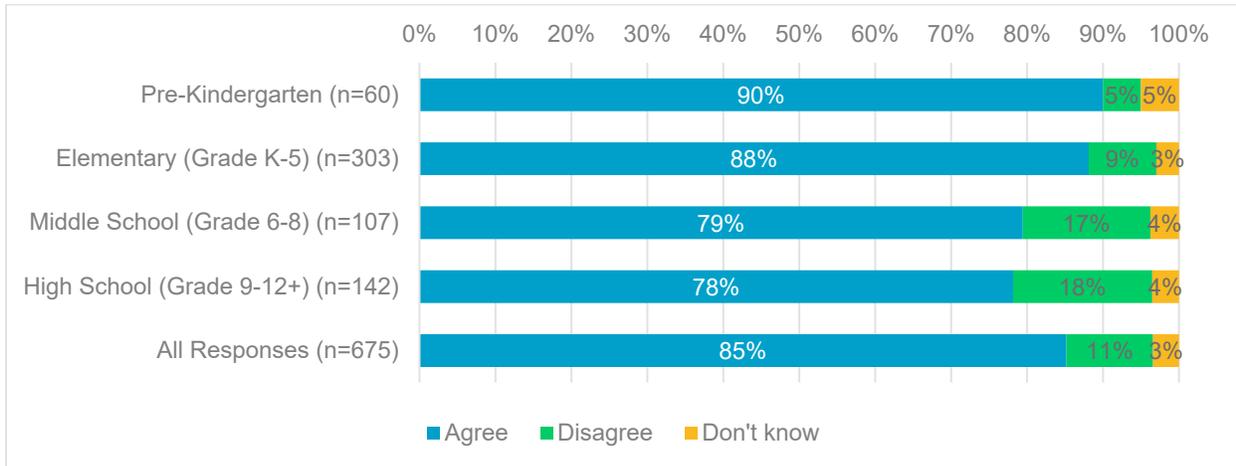
There has been a concerted effort to increase partnerships between home and school to improve student learning and translate skills from the classroom to student behavior and engagement at home. While there are opportunities for improvement, many parents mentioned: 1) a desire for more strategies for

communicating with their students, 2) a better understanding of how to encourage students to share what they are learning in the classroom, and 3) tangible ways to show what students are demonstrating at home that may not be observed in the classroom.

### Parent Survey

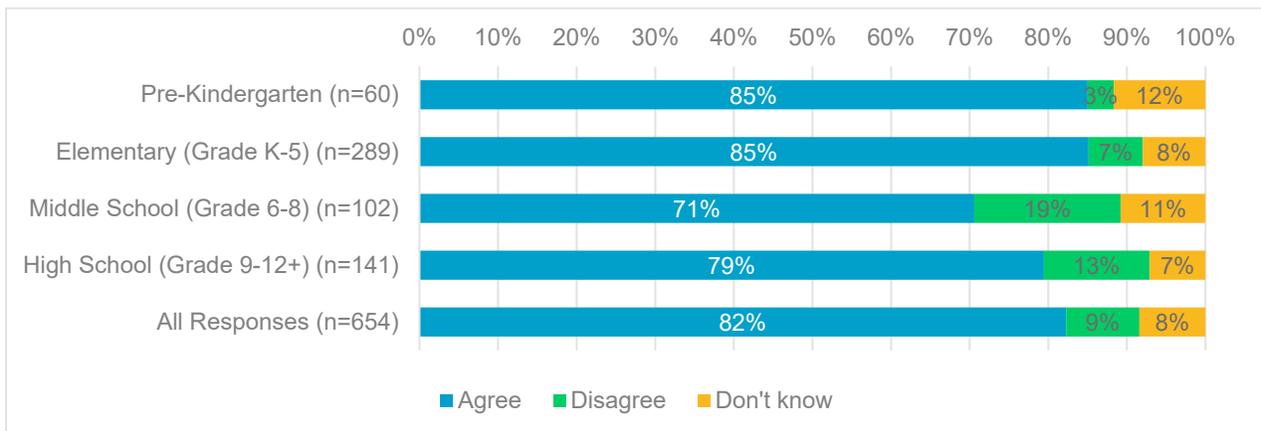
Overall, a large percentage of parents (85 percent) felt that they have a good working relationship with their child’s teachers. A higher percentage of parents of students in high school (18 percent) disagreed.

**Exhibit 116. Parent Survey: I have a good working relationship with my child's teachers.**



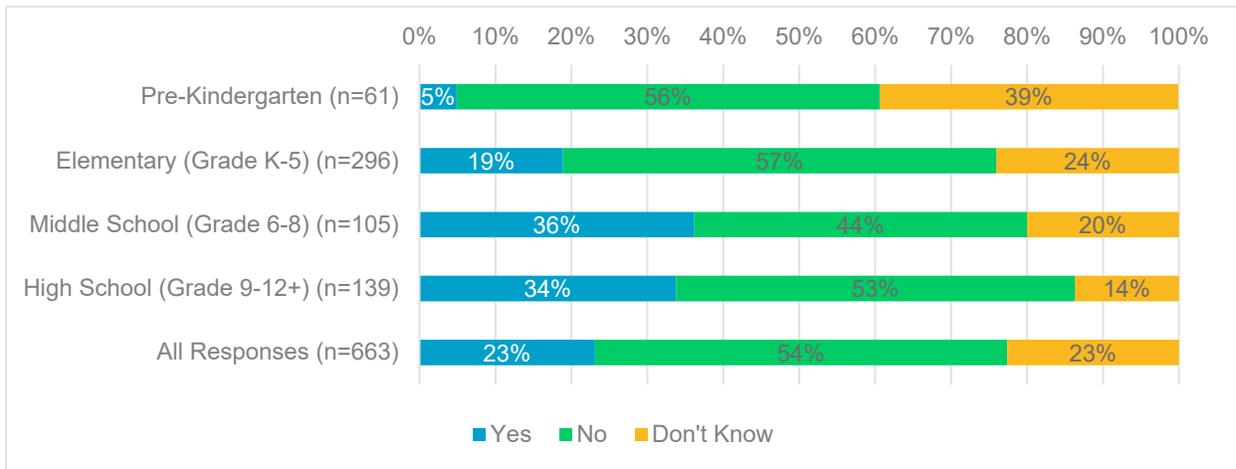
When parents were asked if their child feels safe at school, 82 percent agreed and 9 percent disagreed. A smaller percentage of parents of students in middle agreed (71 percent).

**Exhibit 117. Parent Survey: My child feels safe at school.**

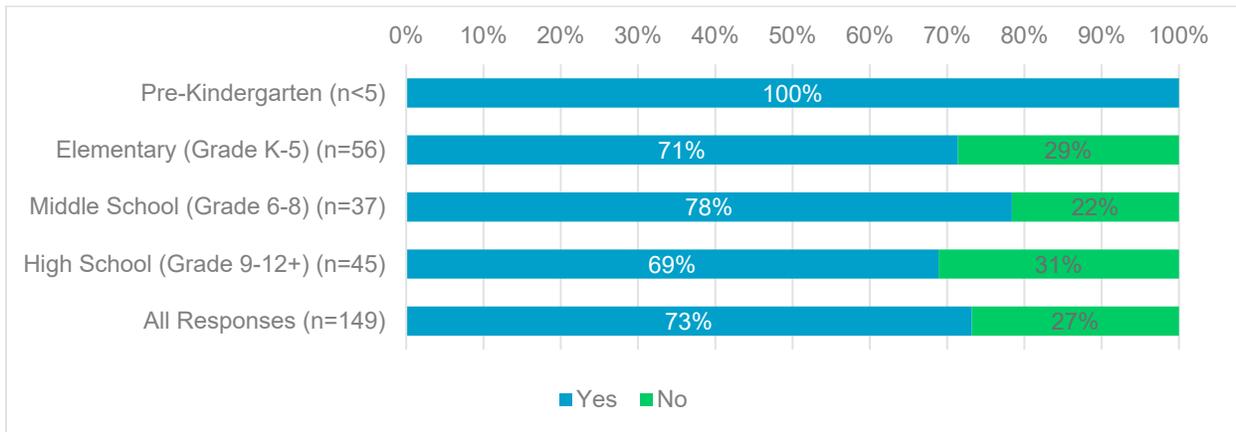


Of the parents who responded to the survey, 23 percent indicated their child experienced bullying at school. Of the parents whose children experience bullying, 73 percent reported their concerns to the school. The majority of parents (65 percent) agreed that the school addressed their concerns, while 28 percent disagreed.

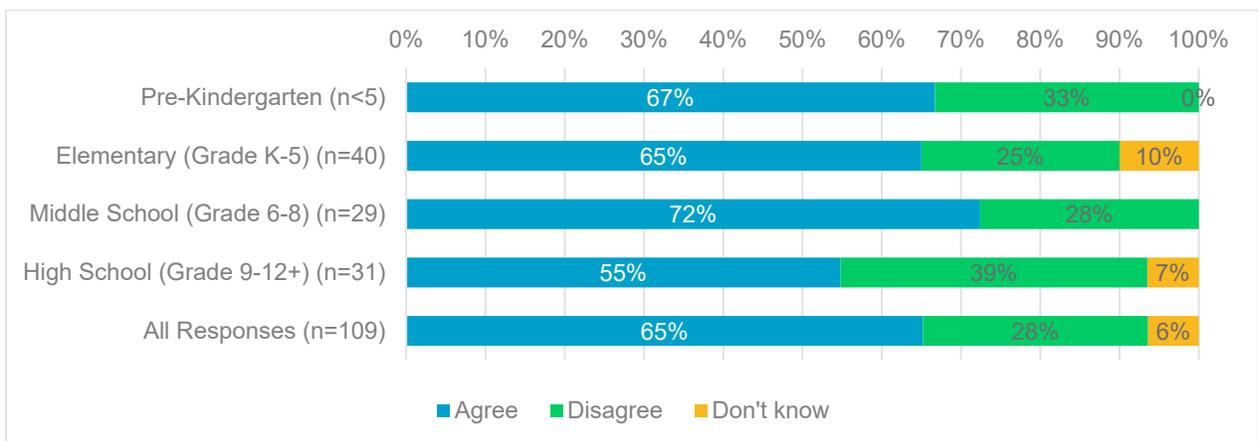
**Exhibit 118. Parent Survey: My child has experienced bullying at school.**



**Exhibit 119. Parent Survey: Have you reported concerns of bullying to your child's school?**



**Exhibit 120. Parent Survey: The school addressed my concerns.**



## Summary and Implications

High family and community engagement is a priority for GISD in supporting their district vision. Engaging with parents and families of students with IEPs who are receiving academic and behavioral supports, then, is a key focus of their efforts to increase engagement.

A review of the data collected from the parent survey, focus groups, and interviews indicate that GISD is effectively serving students and engaging parents in some areas. The following are effective areas of engagement, as reported by parents:

- Many parents receive daily updates on their student's activities and progress in class.
- Parents in multiple focus groups shared that they were invited to visit and observe (prior to COVID-19).
- Several parents said they felt included in the goal-setting process for their students and that there is effective dialogue around the ARD process.
- Parents mentioned that teachers had helped connect them to resources for their student, particularly during COVID.
- The district uses multiple modes of communication for sharing information, including website, newsletter, and social media.
- Trainings are offered for parents and families of students receiving behavioral supports.
- GISD has caring, concerned teachers and paraprofessionals who express commitment to establishing connections with parents.
- The district has knowledgeable diagnosticians, speech therapist(s), and other service providers.

Although parents see GISD teachers as compassionate and caring, the parents surveyed also expressed concerns about specific aspects of GISD special education as it relates to engaging with parents. These include some key areas related to communication and parent information, specifically that not all materials are readily available in Spanish and that news of trainings or other resources do not always reach all parents. Parent responses in focus groups, as well as interviews with staff, speak to a disconnect between some families and the teachers and administrators in their student's school, especially where the student or a parent is an English learner.

## IX. RECOMMENDATIONS AND ACTION STEPS

PCG recognizes the commitment GISD leadership has provided as part of this comprehensive special education review. GISD has many notable strengths, including its willingness to undertake this review and act on the recommendations as part of a continuous improvement cycle.

The following recommendations are considered priority recommendations. Each is interrelated and will require a significant investment on the part of GISD to undertake. Implementation of these recommendations will set the foundation for all other action steps that emerge from this report. The action steps listed under each recommendation below are organized in a manner that provides a comprehensive view of the activities required to initiate change. Although components of the action steps can be implemented within a shorter timeframe, full-scale implementation of the recommendations may take three to five years.

PCG has mapped the recommendations in this report to the Special Education Effectiveness Domains. Action steps corresponding to the recommendations are included below.

Table 10. PCG Effectiveness Domains

| Domains  | Recommendations  |
|--|--|
|  <p><b>Learning Environment and Specialized Services</b></p> <p>Delivering instruction and interventions within an inclusionary framework and with IEP fidelity, leading to increased access and progress in grade-level learning standards and reducing disproportionality</p> | <ol style="list-style-type: none"> <li>1. Multi-Tiered System of Supports</li> <li>2. Identification Practices and Disproportionality Monitoring</li> <li>3. IEP Development</li> <li>4. Expanding the LRE Continuum</li> <li>5. Specially Designed Instruction, Collaborative Teaching, and Co-Teaching</li> <li>6. Inclusive Practices Planning, Guidance, and Implementation</li> </ol> |
|  <p><b>Leadership</b></p> <p>Supporting students with disabilities (including increased collaboration and ownership of school administrators and staff) and coordinating efforts with community organizations to improve results</p>  | <ol style="list-style-type: none"> <li>7. Elevate Rigor</li> </ol>   |
|  <p><b>High Expectations</b></p> <p>Increasing expectations of students with disabilities by presuming competence and incorporating culturally relevant, growth-oriented practices</p>  | <ol style="list-style-type: none"> <li>8. Adherence to Intent and Spirit of IDEA</li> <li>9. School Leader's Voices</li> </ol>   |
|  <p><b>Human Capital</b></p>  | <ol style="list-style-type: none"> <li>10. Expanding the Roles of Mental Health Practitioners in GISD</li> </ol>   |

|  |   |
|--|---|
| <p>Investing in people from recruitment to retirement to ensure highly qualified and effective staff have the skills/training needed to provide services and support to promote the success of diverse learners</p>  | <p>11. Developing a Systematic, Districtwide Approach to Professional Development</p>   |
| <p> <b>Systems and Structures</b></p> <p>Defining expectations for service delivery, resource allocation, and data management infrastructure to guide data-driven decisions</p> | <p>12. Special Education Policy and Procedure Manual</p> <p>13. Facilities Planning</p> <p>14. Department of Special Education Organizational Structure</p> |
| <p> <b>Family and Community Engagement</b></p> <p>Embracing partnerships to make informed decisions and provide equitable opportunities for all students</p>                    | <p>15. Parent Trainings, Communication, and Resources</p> <p>16. Parent Group</p>   |

## Learning Environment and Specialized Services

### 1. Multi-Tiered System of Supports

- a. **MTSS framework.** Build on GISD's current RTI and PBIS processes to develop a unified and clear structure of MTSS for academic achievement, positive behavior, and social/emotional growth (including enrichment) for all students. Create guides to explain how the intervention models, such as RTI, PBIS, etc., complement each other.
- b. **Districtwide leadership team.** Develop an MTSS cross-departmental district-level leadership team, including senior leadership, school principals, and representatives from every educational unit (e.g., special education, Title I, bilingual, gifted, etc.). Schedule meetings at least monthly to review, update, operationalize, and monitor the fidelity of MTSS implementation. Establish comparable school-based leadership teams to oversee MTSS implementation at each school.
- c. **Expectations.** Establish, communicate, support, and monitor clear expectations for MTSS, with clear lines of accountability and responsibility across departments and schools, aligning them with relevant standards and guidelines.
- d. **Guard rails.** Determine what expectations will be required district-wide and which will be a school-based decision. Incorporate the expectations into administrator, principal, teacher, paraprofessional, and related-service personnel evaluations.
- e. **School-based MTSS teams.** Require all schools to operate a school-based MTSS team to support problem-solving, data-based decision making at all tiers to support academic advancement and positive behavior, and consistency between schools. Ensure principals schedule time for teams to implement the problem-solving process, meet and review progress monitoring and intervention data, be empowered, and be held accountable for adjusting school schedules to provide the necessary supports for all struggling students.
- f. **Professional development.** Provide MTSS professional development (inclusive of RTI and PBIS) for all school-based staff. Have central office staff develop turnaround trainings for school-level staff, so a unified voice is heard throughout the district.
- g. **Equity.** Provide training on the implications of race/ethnicity/language, socio-economic status, and culture constructs for MTSS teams when developing student intervention plans.
- h. **Intersession.** Continue to employ and grow the Intersession model so that all students can receive targeted supports for their needs.

### 2. Identification Practices and Disproportionality Monitoring

- a. **Track disproportionality in disability identification.** At least quarterly, use the risk ratio to measure the identification rates of students with IEPs by race/ethnicity and other important indicators, such as language status, free and reduced lunch status, giftedness, suspension rates, etc., to identify any student group that it is two times more likely than peers to be identified as being over-identified (i.e., risk ratios).
- b. **Track school identification rates.** Analyze longitudinal data to determine which schools may be identifying students with IEPs at a rate that is disproportionately higher or lower than other schools.
- c. **Data review and hypotheses.** With a cross-departmental group of leaders and staff, use this data to develop hypotheses for identified disproportionate risk ratios for any group of students, delays in the evaluation referrals and completions, and/or schools with disproportionately high new identification rates.

- d. **Follow-up action.** Based on these hypotheses, develop any additional written guidance needed to clarify procedures and practices, consider any additional resources and strategies needed along with a written plan, if appropriate, and provide training to support implementation. For example, identification disproportionality training would include the implications of race/ethnicity/language, socio-economic status, and culture constructs for school-based teams when considering students for an evaluation.
- e. **Monitoring.** Based on the areas of practice identified through the above activities, identify data to be collected and monitored, along with any practices to be monitored, to support consistent implementation across GISD and to identify schools needing additional support or intervention.

### 3. IEP Development

- a. **Written procedures.** Include in GISD's written special education guidance standards and examples for IEP development processes that are appropriate and consistent across the district. Guidance would include but not be limited to Present Levels of Academic Achievement and Functional Performance (PLAAFPs) and data use within IEP goals, accommodations, and progress reporting. Include a procedure for discussing additional material and human resources than those currently available to meet a particular student's needs, including those needed for students who would otherwise be placed out of district.
- b. **IEP goals.** Ensure IEP goals are based on student needs identified within the PLAAFPs, ensuring that goals are not being created or influenced by district limitations within GISD's current continuum of services.
- c. **Monitoring IEPs.** Establish and implement a process for periodically reviewing student IEPs for their consistency with expected standards. Consider using a school-based process, which would include an impartial GISD facilitator to review, analyze and discuss IEPs with teachers and related service providers. Specifically, address the misconception of 70% targets through a database to conduct internal audits for how goals are being set and progress is being monitored.
- d. **Electronic data repository.** Implement an electronic data system that improves data collection and subsequent reporting of student data for quarterly IEP progress reporting.
- e. **Collaboration.** Foster positive ARD collaboration by creating more planning time between general education and special education teachers; ensuring adequate time and coverage for staff participating in ARD meetings; and transparent processes around timelines, data, and information sharing with parents to enhance trust and partnership among all ARD members. Provide interpreters for parents who are non-native English speakers and translate IEP documents.

### 4. Expanding the LRE Continuum

- a. **Analyze current LRE continuum across all grade levels.** Complete a deeper analysis of students, instruction, and materials in each of the current LRE continuum options (area of disability, skill level, communication and other supports provided, assessment data, student-teacher-paraprofessional ratios, etc.) to create an accurate description of what is taught. Also, for each placement by programmatic structure and curricula intensity, assess student profiles that include their individual instructional needs, as well as the progress they have made over the past school year.
- b. **Reconstruct instructional models.** Based on this program review, analyze gaps in instructional, behavioral, and classroom needs, materials, assistive technology, student to adult ratios, etc., within and between current programs. Create and rebrand with new models that collectively address all individualized student needs and is flexible enough to maximize the receipt of grade-level content, interaction with non-disabled peers, and improve achievement and positive behavior along with social/emotional well-being. Continue to resist grouping students by disability label and

instead rely on their learning needs regardless of disability nomenclature. Furthermore, do not limit resources to a particular instructional model. Instead allow for flexibility so learning materials and other resources are allocated based on student need and not dictated by a particular model. Document the models with written information to inform professional development and resource needs.

- c. **Professional development.** Provide professional development for all personnel associated with the newly developed models of instruction. As part of the more generalized professional development specified in these recommendations, emphasize that in all circumstances, it is not appropriate for students to be referred to by their placement name (e.g., ALE, BASE, etc.), as using such titles is not respectful and is stigmatizing. Instead, emphasize the use of “people first” language, where the emphasis is on students and not their placement.
- d. **Monitor placements of former PAC students.** Develop a system to monitor the progress of students who were formerly in the PAC program.
- e. **Assess placements.** Based on the data above, at least annually review trends and how GISD can reconfigure its human and material resources to provide students with significant emotional disabilities more supportive, flexible in-district options for students.
- f. **Professional development.** Provide professional development for teachers involved with these models so they understand their roles and can carry them out.

## ***5. Specially Designed Instruction, Collaborative Teaching, and Co-Teaching***

- a. **Specially designed instruction.** Enhance current SDI guidance and resources to help teachers, paraprofessionals, and administrators make stronger connections on where SDI is addressed in the IEP implementation process and how to utilize the information to inform planning and instruction for co-teaching. Place a stronger emphasis on the training, support, and resources guiding the provision of the alternative “specially designed instruction” provided by paraprofessionals in inclusion settings.
- b. **Collaborative consultation.** Draft guidance for collaborative and consultative teaching to support students with disabilities. Under this model, general educators, along with one or more other educators (e.g., special educator, reading specialist, EL teacher, gifted/talented teacher) collaborate around the designing, delivering, monitoring, and evaluating of instruction in general education classes, with the general educator providing instruction.
- c. **Co-taught instruction.** Draft guidance for the delivery of co-taught instruction based on the most effective model for instruction purposes and use of the special educator. Based on the developed guidance, provide intensive professional development and follow-up coaching and modeling to give co-teachers the information and support they need to be true partners in the planning and delivery of classroom instruction. Monitor implementation through classroom walk-through activities that are guided by observation protocol for this purpose.
- d. **Professional development.** Provide professional development on collaborative teaching, co-teach to ensure teachers engage in a true instructional partnership. Provide planning time for general education and special educators and others to become true collaborative partners. Develop a process to collect effectiveness measures on the use of SDI during co-teaching. Use the TEA SDI guidance documents to develop the measures that inform practice, analyze the trend data to carefully consider how these practices, when paired together, impact the district’s objectives and address student needs, outcomes, and results.

## ***6. Inclusive Practices Planning, Guidance, and Implementation***

- a. **Inclusive education framework.** Develop and use a structured framework/model that will help promote and support the implementation of best practices for inclusive education including the provision of high yield collaborative teaching, specially designed instruction, and related services.

- b. Implementation guide.** Develop a clearly articulated district/school implementation guide based on the inclusive education framework with expected guidance, procedures, and practices. Determine the role of schools to adapt the framework to their unique needs versus GISD requirements. This process could also include GISD's advance approval for a school to adapt the framework with deviations GISD defines as significant.
- c. Scheduled time for collaboration.** Establish written guidance for the use of inclusive master school schedules, which establish common planning time for collaborative teaching, co-teaching, and other activities for general educators with special education and other personnel. Develop various scheduling models that schools could use and/or adapt.
- d. Cross-departmental collaboration.** Through intentional collaboration between the Chief Academic Office, the Special Education Department, and Math and ELA content specialists; further study achievement and suspension gaps between students with IEPs and their typically developing peers on state standardized assessments, and between students with IEPs by race/ethnicity, English learner status, social economic status, gender, etc. Use this information to inform discussions about improving GISD's continuum of services, including making inclusive instruction more effective.

## Leadership

### 7. Elevate Rigor

- a. Create accountability structures.** Include in the GISD's system of accountability measurable expectations for implementing inclusive practices for all students with disabilities across educational settings. Establish, communicate, support, and monitor clear expectations and "non-negotiables," establishing clear lines of accountability and responsibility across departments and schools, aligning them with relevant standards and guidance. Incorporate the expectations into administrator, principal, teacher, paraprofessional aides, and related-service personnel evaluations. Have schools incorporate activities into their school improvement plans that would enable them to meet these expectations.
- b. Professional development and resources.** Ensure that all professional development designed and delivered elevates instructional rigor that is inclusive of students with disabilities. Focus information on best practices for motivating learners and setting high expectations, addressing UDL and differentiated instruction, progress monitoring, and mastery of learning. Include how this information will be supported with necessary material and human resources.

## High Expectations

### 8. Adherence to Intent and Spirit of IDEA

- a. Communication of high expectations.** Set high expectations both through establishing an inclusive vision and through joint statements from the Superintendent and Board of Education regarding the provision of rigorous instruction and supports and related services delineated in IEPs so students have the necessary tools they need to access high-quality instruction.
- b. Develop guidelines.** Be clear about the role of central office in supporting the learning of students receiving special education: schools must be responsible and accountable for the teaching and learning process, while the Office of Special Education's role is to provide adequate resources, clear guidance, and professional development, and support schools in the consistent and effective implementation of programs and services.
- c. Collaboration support.** Guide the design of intentional structures and resources needed to help foster greater collaboration across disciplines, grade levels, and areas of specific expertise.

- d. **Monitoring.** Develop and implement protocols for fidelity checks on IEP delivered versus prescribed instruction and services (e.g., co-teaching, instructional and testing accommodations/modifications, specially designed instruction, related services, etc.).
- e. **Professional development.** Continue annual campus leader training on the fundamental aspects of the IDEA law and regulations.

## 9. School Leader's Voices

- a. **Build structures and processes.** Emphasize in the training and support provided to principals the importance of building structures and processes in schools to increase *academic optimism* and nurture *a climate of acceptance, high expectations, and achievement for all students*.
- b. **Annual school leader and teacher survey.** Conduct an annual survey to measure school-based leadership and teachers' instructional beliefs and the extent to which they understand presumed competence. Analyze results by school and teacher role.
- c. **School plans.** Develop a protocol by which each school site would design instructional and support improvements to increase the social value and positive behavioral outcomes over time for students with disabilities.

## Human Capital

### 10. Expanding the Roles of Mental Health Practitioners

- a. **Conduct an In-Depth Analysis of LSSPs and Evaluation Team Structures.** Evaluate the current evaluation team model (Diagnostician and LSSP) and assess the extent to which current staffing supports the intended outcomes of effective service delivery and the continued enhancement of addressing student mental health. If revisions are necessary, engage a broad group of stakeholders to develop and review them. Review personnel ratios and caseload data included in this study, reallocate or add resources to ensure that GISD expectations regarding the provision of mental health counseling and related services are reasonably capable of being met. Make the revised formula transparent and evaluate needed changes for the short and long term.
- b. **Schedule Efficiently and Monitor Caseloads of School Personnel.** Maximize the use of the personnel resources available in schools to provide behavioral and mental health supports/interventions and related services to students with disabilities by scheduling, monitoring, and adjusting the caseloads to better utilize the existing resources with greater efficiency.
- c. **Cross-functional teams.** Cross-train individuals from different divisions/departments to maximize their knowledge and skills in mental health and behavioral support to leverage their collective resources to provide direct support, mentoring, coaching, and technical assistance to principals and teachers.
- d. **High-quality trainers.** Ensure that all trainers are knowledgeable and effective. Identify and use exemplary school-based staff in addition to others.
- e. **Access to differentiated learning.** Differentiate professional learning according to each audience's skills, experience, and needs. Have professional learning and technical assistance continue for new personnel and those needing additional support.
- f. **Exemplary implementation models.** Identify and share district-wide best practices that demonstrate high expectations and effective implementation to ensure they include students with IEPs, ELLs, students who are twice-exceptional, etc. Encourage staff to visit exemplary schools and set aside time for that to happen.

## 11. *Developing a Systematic, Districtwide Approach to Professional Development*

- a. **Plan.** Develop a systematic, district-wide professional development plan differentiated by role (and level, as needed) to prioritize special education PD that is tied to the overall needs of the district and the strategic plan.
- b. **Access to differentiated learning.** Differentiate professional learning according to the audience's skills, experience, and need. Ensure that professional learning is engaging and differentiated based on individual skills, experience, and need. Have professional learning and technical assistance continue for new personnel and those needing additional support.
- c. **Multiple formats.** Continue to use multiple formats (e.g., videos, webinars, and narrative text) and presentation approaches (e.g., school-based, small groups) for professional learning so that all staff can more easily access the content.
- d. **Exemplary implementation models.** Identify and share district-wide best practices that demonstrate high expectations and effective implementation to ensure they include students with IEPs, ELs, students who are twice-exceptional, etc. Continue to build a centralized repository of exemplary practices, including identification of exemplary schools and programs in GISD.

## Systems and Structures

### 12. *Special Education Policy and Procedure Manual*

- a. **GISD Special Education Department Handbooks.** Revise the existing handbooks into an interactive, web based GISD special education manual to support user-friendly and transparent access to procedures/practices relevant to the management and operations of special education and to which school staff can be held accountable for implementing. Streamline resources so that school teams can easily access relevant information and use embedded hyperlinks to provide information for staff as needed. Update the manual on a routine basis. Include criteria, procedures, and practices for each area in the manual relevant to the implementation of these recommendations, e.g., criteria for child find; MTSS progress criteria to support the referral of students for special education evaluations; inclusive instruction; a revised continuum of services; transportation protocol; etc.

### 13. *Facilities Planning*

- a. **Communication plan.** Create a workgroup with representatives from Special Education, Facilities, and Finance to evaluate the current process for determining the placement of self-contained classrooms and programs and assess the extent to which current building infrastructure supports the intended outcomes of effective service delivery. If revisions are necessary, engage a broad group of stakeholders to develop and review them. Review "ed specs" and design guidelines for these programs to reallocate or add resources to ensure that GISD's expectations regarding the provision of SDI/related services are reasonably capable of being met and that students with disabilities do not transition to other schools on a more frequent basis than their non-disabled peers. Make the revised formula transparent and evaluate needed changes for the short and long term.
- b. **Jointly establish a special education classroom funding plan.** Determine how funds will be used to execute the long-range plan identified by the outside architectural firm, including bonds and program support. Create a monitoring plan to assess, on an ongoing basis, if the funding allocation is having an impact and adjust as necessary. Ensure the plan is agreed upon and coordinated between Special Education, Facilities, and Finance.

## 14. Department of Special Education Organizational Structure

- a. **Reorganize the Department of Special Education.** Reduce the number of direct reports to the executive director and streamline supports to schools by reorganizing according to the following functions: Related Services, Resource/ Inclusion Programming, Specialized Units, Finance and Policy, and Dyslexia,
- b. **Assistant director positions.** Create an assistant director position for the following functional areas: Related Services, Resource/ Inclusion Programming, and Specialized Units, and Finance and Policy.

## Family and Community Engagement

### 15. Parent Trainings, Communication, and Resources

- a. **Parent training plan.** In consultation with representatives of parent support groups, develop a training plan for families in the areas of IEP process, their rights under IDEA, role of the ARD team, helpful hints for parents at home, and how families can take an active and collaborative role at IEP meetings. Trainings should be offered quarterly, at a minimum, with support for asynchronous learning resources, like webinars, videos, or printed materials and books that can be accessed by parents.
- b. **Provide parent training sessions in accessible formats.** Sessions should be accessible to all interested parents (in terms of language, mode of communication, offered asynchronously to allow for varying work schedules, and recorded for asynchronous learning). Ensure the information is accessible to parents with diverse linguistic needs and sensory limitations.
- c. **Establish a place for curated resources that support parent learning.** For parents of students receiving academic and behavioral supports, access to reading materials, manipulatives, and sensory items can provide much-needed support for connecting in-school learning to the home environment. In curating resources, consider linguistic diversity of parents, access to technology, and mode of communication.
- d. **Support development of inclusive school communication plans.** To ensure that all students have access to high-quality programming and both academic and non-academic school activities, all parents need to have access to announcements and information about accessing those activities. Development of school-level plans will help increase consistency across classrooms and teachers, support current information across school and district platforms, and leverage resources for translation. As part of an effort to increase access for all students to participate in programs and activities, consider soliciting feedback from parents and students about interests and necessary accommodations so students can participate.
- e. **Support teacher professional learning for effective parent engagement and effective parent communication.** Even highly effective communication may need to be adapted as the district changes. It is critical that communication be improved and adjusted to meet the needs of GISD's diverse stakeholders. Increase staff awareness of resources that provide access for English learners, bilingual students and families, and multiple modes of communication (e.g., American Sign Language).
- f. **Engage parents as trainers and facilitators for trainings.** To increase GISD capacity for providing more frequent trainings and reduce the load on staff who are serving large caseloads, leverage interested parents as trainers and facilitators of parent training and information sessions, with appropriate professional development (i.e., a train-the-trainer model).
- g. **Provide a schedule of parent trainings at the beginning of the year.** Review list of topics provided in the survey results above and solicit additional parent and staff input for ideas. Expand

current offerings to include topics that are inclusive of parents/families of students with varying disabilities and needs related to academic and behavioral supports.

## 16. Parent Group

- a. **Facilitate establishment of a parent group.** This group should be led by a parent of a student with an IEP or who is receiving academic or behavioral supports. To support the parent group, GISD should partner with participants to identify needs and plan for parent trainings throughout the year.
- b. **Support student skill development at home.** As part of the ARD meeting, provide materials and tools to support students' skill development at home. Communicate expectations clearly and help parents with strategies for noting new skills and growth observed at home.

## From Strategy to Execution

The secret to successful strategy execution is in translating strategies into actions. Further, tracking progress made on an organization's strategy execution is integral to understanding whether it will reach its desired future state. From our experience, the most challenging part of a comprehensive program evaluation for a school district is moving from the recommendations to a concrete action plan, then to a change in practice. These steps require significant focus, in addition to organization, communication, and collaboration across departments. Implementing change across often siloed and independent departments, with differing priorities and reporting structures, requires out of the box thinking and a commitment to approaching issues and solutions in a new light.

While there are different approaches that school districts take to managing this process, the most successful ones create a structure that is sustainable, with internal and external accountability measures and strong cross-departmental advocates. PCG recommends a five-step Strategy Execution process, which we have found results in grounded, sustainable change within an organization.

PCG recommends that GISD address each component of our *Strategy Execution Process* in order to position the District to make lasting and impactful changes.

### Exhibit 121. PCG's Strategy Execution Process



### Structure Milestones for Initiatives

Action plans must include concrete, measurable milestones that can be assessed on a regular basis. These milestones break down initiatives into manageable steps and timelines. This structure is essential, especially given the school year cycle and the urgency by which GISD would like to move these critical initiatives forward. At minimum, given the nature of the initiatives, progress toward milestones should be reviewed monthly through the 2021-22 and 2022-23 school years.

### Develop a Tracking System with KPIs

Key Performance Indicators (KPIs) must be established for each measurable milestone. Reviewing these KPIs will help GISD assess where each initiative stands. By monitoring these KPIs frequently, GISD will be able to assess barriers and adjust plans early in the process if needed. It is often the case that defining metrics or KPIs is the step that allows teams to recognize challenges within the theory of action that undergirds their action plan.

### **Communicate the Objectives**

To implement new policies and procedures, organizational changes, or new approaches, stakeholders need a solid grasp of the initiatives, the objectives, and the benefits the plan will bring to bear. Communicating progress made on each key initiative is equally important to ensuring continued support from those impacted by the changes, as well as the associated stakeholders.

### **Monitor Progress and Review Outcomes**

Action plans are more likely to succeed when staff are deeply involved with the implementation process and there are standing monthly status checks on progress made toward established objectives. It is also critical at this point to celebrate real progress and hold individuals who have not “delivered” accountable.

### **Make Plan Adjustments as Necessary**

An action plan is not an unchangeable document. It is a fluid plan that should be revised and updated as the GISD environment changes and grows. Openness to revising the action plans will enable GISD to adjust to shifting fiscal and regulatory realities as well as changing priorities. If GISD’s core leadership team sees progress on certain initiatives falling short of expectations, a reevaluation of the original objectives and approach may be needed. However, it is also important to assess the causes of discrepancies between actual and planned results.

## APPENDIX

### A. Incidence of Students with IEPs & Personnel Staffing Ratios (Updated Spring, 2021)\*

|                        | % IEPs of All Students |              | Sp Ed Teachers |             | Paraeducators |             | Speech/Lang Pathologists |             | Psychologist |            |
|------------------------|------------------------|--------------|----------------|-------------|---------------|-------------|--------------------------|-------------|--------------|------------|
|                        | # IEPs                 | % IEPs       | FTE            | Ratio       | FTE           | Ratio       | FTE                      | Ratio       | FTE          | Ratio      |
| Agawam, MA             | 656                    | 15%          | 39             | 17          | 100           | 7           | 15                       | 44          | 3            | 219        |
| Atlanta, GA            | 4,950                  | 11%          | 431            | 11          | 224           | 22          | 65                       | 76          | 22           | 225        |
| Albuquerque, NM        | 16,738                 | 20.4%        | 1217           | 13.8        | 1290          | 12.98       | 161.5                    | 103.6       | 97.6**       | 171.5      |
| Anchorage, AK          | 6,779                  | 14.1%        | 716.8          | 9.5         | 786.4         | 8.6         | 65                       | 104         | 44.7         | 151        |
| Arlington, VA          | 2952                   | 13.9%        | 343            | 8.6         | 262           | 11          | 38                       | 77          | 22           | 134        |
| Austin, TX             | 9,450                  | 11.7%        | 802            | 11.8        | 912.8         | 10.4        | 88.7                     | 107         | 54.5         | 173        |
| Baltimore City, MA     | 12,719                 | 16.5%        | 999.5          | 12          | 429           | 21          | 92                       | 140         | NA           | NA         |
| Baltimore County, MA   | 12,127                 | 11.4%        | 1025.4         | 11.8        | 2305          | 29.6        | 187.5                    | 92          | 145.7        | 87         |
| Boston, MA             | 10,478                 | 19.9%        | 1293           | 8.1         | 1104          | 9.5         | 133.4                    | 79          | 63.6         | 165        |
| Bellevue, WA           | 1,947                  | 10.3%        | 82.7           | 23.5        | 118.6         | 16.4        | 17.4                     | 112         | 17.3         | 112.5      |
| Bridgeport, CT         | 2,618                  | 14.3%        | 204            | 13          | 254           | 10          | 25                       | 105         | 33           | 79         |
| Buffalo, NY            | 7744                   | 16.6%        | 753            | 10.3        | 439           | 17.6        | 109                      | 71          | 62           | 125        |
| Cambridge, MA          | 1,200                  | 20%          | 176            | 7           | 103           | 12          | 20                       | 60          | 22           | 55         |
| Carpentersville, IL    | 3,139                  | 15.8%        | 227            | 13.8        | 380           | 8.3         | 43                       | 73          | 28           | 112        |
| Chicago, IL            | 54,376                 | 13.7%        | 4,649          | 11.7        | 4,228         | 12.9        | 390                      | 139         | 261          | 208        |
| Cincinnati, OH         | 8,928                  | 17.4%        | 457            | 19.5        | 801           | 11.1        | 62                       | 144         | 57.7         | 155        |
| Clark County, NV       | 40,067                 | 12.5%        | 3,260          | 12.3        | 1,952.8       | 20.5        | 390.5                    | 102.6       | 187.5        | 214        |
| Cleve Hts, OH          | 1,100                  | 18%          | 83             | 14          | 58            | 19          | 7                        | 158         | 8            | NA         |
| Cleveland, OH          | 8,350                  | 21.4%        | 855            | 9.8         | 486           | 17.2        | 81                       | 103         | 82           | 102        |
| Columbus City, OH      | 9,727                  | 18.1%        | 650            | 15.0        | 990           | 9.8         | 64                       | 152         | 78           | 125        |
| Compton, CA            | 2981                   | 11.2%        | 126            | 28          | 118           | 25          | 5                        | 596         | 14           | 213        |
| Dallas, TX             | 13,470                 | 9.1%         | 1,078          | 12.5        | 868.5         | 15.5        | 81                       | 166         | 37           | 364        |
| DeKalb 428, IL         | 879                    | 14.1%        | 58             | 15.2        | 205           | 4.3         | 9                        | 98          | 7.5          | 117        |
| DesMoines, OH          | 4,854                  | 15.3%        | 493*           | 9.8         | 58.5          | 13.5        | 37.3                     | 130         | 11.5         | 422        |
| D.C. Public Schools    | 8,603                  | 18%          | 669            | 13          | 653           | 14          | 90                       | 96          | 78           | 111        |
| Davenport, IA          | 1,857                  | 12%          | 188            | 10          | 287           | 7           | NA                       | NA          | NA           | NA         |
| Deer Valley, AZ        | 3,289                  | 9%           | 190            | 18          | 229           | 15          | 49                       | 68          | 108          | 31         |
| Denver, CO             | 9,142                  | 12%          | 592            | 16          | 528           | 18          | 94                       | 98          | 98           | 94         |
| Detroit, MI            | 8,731                  | 16.1%        | 535.8          | 16          | 458           | 19          | 98                       | 89          | 40           | 218        |
| ESD 112, WA            | 1,987                  | 14%          | 55             | 37          | 158           | 13          | 20                       | 100         | 12           | 166        |
| Elgin U-46, IL         | 5,304                  | 13.1%        | 252.8          | 21          | 288.5         | 18          | 71.9                     | 74          | 20           | 265        |
| Everett, WA            | 1,049                  | 17%          | 74             | 15          | 51            | 21          | 4                        | 263         | 5            | 210        |
| Fort Worth, TX         | 6,144                  | 8%           | 520            | 12          | 450           | 14          | 73                       | 85          | 31           | 199        |
| Fresno, CA             | 8,271                  | 11.2%        | 509.6          | 16.2        | 603.1         | 13.7        | 75.5                     | 110         | 65.7         | 126        |
| <b>Garland ISD, TX</b> | <b>5393</b>            | <b>10.0%</b> | <b>371</b>     | <b>14.5</b> | <b>338</b>    | <b>15.9</b> | <b>57</b>                | <b>94.6</b> | <b>9</b>     | <b>599</b> |
| Greenville County, SC  | 9,894                  | 14%          | 463            | 21          | 376           | 26          | 93                       | 106         | 25           | 396        |
| Guilford County, SC    | 10,062                 | 12.8%        | 575            | 17.8        | 448           | 22.5        | 127.7                    | 79          | 52.33        | 192        |
| Houston, TX            | 15,655                 | 7.3%         | 3,159          | 5.0         | 3,158         | 5.0         | 160                      | 98          | 150**        | 104        |
| Jackson County, FL     | 2,740                  | 11.3%        | 193            | 14.2        | 89            | 30.8        | 25                       | 119         | 110**        | 274        |
| Kalamazoo, MI          | 1,667                  | 14%          | 70             | 24          | 79            | 22          | 15                       | 112         | NA           | NA         |
| Kent, WA               | 3,069                  | 11.3%        | 148.7          | 20.6        | 318           | 9.7         | 32.3                     | 95          | 25           | 123        |
| Lake Washington, WA    | 3,145                  | 11.7%        | 155.1          | 20.3        | 241.5         | 13.0        | 32.6                     | 96.5        | 24.7         | 127.3      |
| Kyrene, AZ             | 1,544                  | 9%           | 141            | 11          | 124           | 13          | 27                       | 58          | 14           | 111        |
| Lakota, OH             | 1,800                  | 10%          | 126            | 15          | 120           | 15          | 39                       | 47          | 18           | 100        |
| Los Angeles County, CA | 71,969                 | 13.1%        | 4900.9         | 14.7        | 6019.9        | 12.0        | 328.2                    | 219         | 557          | 129        |
| Madison, WI            | 3,808                  | 14.0%        | 347            | 10.9        | 448           | 8.5         | 86                       | 44          | 49           | 77.7       |
| Marlborough, MA        | 1,198                  | 25%          | 141            | 9           | 115           | 11          | 7                        | 172         | 4            | 300        |
| Memphis City, TN       | 16,637                 | 15%          | 912            | 19          | 655           | 26          | 53                       | 314         | 58           | 287        |
| Miami-Dade, FL         | 40,012                 | 11%          | 2,500          | 17          | 1,226         | 33          | 209                      | 192         | 206          | 195        |
| Milwaukee, WI          | 16,406                 | 20.9%        | 1281           | 13          | 988           | 16.6        | 169                      | 80          | 136          | 121        |
| Montgomery, MD         | 17,226                 | 12%          | 1,588          | 11          | 1,398         | 13          | 293                      | 59          | 97           | 178        |
| Naperville IL 203      | 1978                   | 11%          | 150            | 13          | 237           | 8           | 33                       | 59          | 22           | 90         |
| Nashville, TN          | 10,141                 | 12.3%        | 80.5           | 4.9         | 594           | 17.1        | 109                      | 93          | 65.5         | 155        |
| New Bedford, MA        | 2,655                  | 21%          | 204            | 14          | 205           | 13          | 26                       | 103         | 9            | 295        |

|                          | % IEPs of All Students |              | Sp Ed Teachers |             | Paraeducators |             | Speech/Lang Pathologists |            | Psychologist |            |
|--------------------------|------------------------|--------------|----------------|-------------|---------------|-------------|--------------------------|------------|--------------|------------|
|                          | # IEPs                 | % IEPs       | FTE            | Ratio       | FTE           | Ratio       | FTE                      | Ratio      | FTE          | Ratio      |
| North Chicago, IL        | 614                    | 16%          | 39             | 15.7        | 27            | 22.7        | 8                        | 76.8       | 5            | 122.8      |
| Norfolk, VA              | 4329                   | 13.5%        | 381            | 11.4        | 304           | 14.2        | 35                       | 124        | 23           | 188        |
| Oakland Unified, CA      | 5401                   | 15.4%        | 404            | 13.4        | 175           | 31          | 47                       | 115        | 43.5         | 125        |
| Oak Park Sch, IL         | 875                    | 16%          | 78             | 12          | 90            | 10          | 14                       | 63         | 8            | 110        |
| Omaha, NE                | 9,149                  | 17.2%        | 485            | 18.9        | 470.5         | 19.4        | 85                       | 108        | 33           | 281        |
| Orange County, FL        | 24,385                 | 11.1%        | NA             | NA          | 1,165         | 20.9        | 202                      | 121        | 99.5         | 245        |
| Pinellas County, FL      | 14,701                 | 13.0%        | 881            | 16.7        | 774           | 19.0        | 150                      | 98         | 79           | 187        |
| Pittsburgh, PA           | 4,210                  | 18.1%        | 308            | 13.7        | 263           | 16          | 31                       | 136        | 16           | 263        |
| Portland, OR             | 7,168                  | 14.5%        | 282.5          | 25.4        | 414           | 17.3        | 99.6                     | 72         | 59.3         | 121        |
| Providence, RI           | 4460                   | 18.8%        | 340            | 13          | 339           | 13          | 40                       | 111        | 28           | 159        |
| Renton, WA               | 2,108                  | 14.7%        | 129            | 16.3        | 294           | 7           | 20                       | 105        | 15           | 140        |
| Rochester, NY            | 5,472                  | 20%          | 559.2          | 9.8         | 428           | 12.8        | 148                      | 37         | 64           | 85.5       |
| Rockford, IL             | 4,065                  | 14%          | 336            | 12          | 334           | 12          | 49                       | 83         | 24           | 169        |
| Round Rock, TX           | 3,313                  | 8%           | 369            | 9           | 171           | 20          | 41                       | 81         | 29           | 115        |
| Sacramento, CA           | 6,519                  | 13.9%        | 288.1          | 22.6        | 246.2         | 26.5        | 33                       | 128        | 50.8         | 197.5      |
| San Diego, CA            | 16,300                 | 12%          | 1,100          | 15          | 1,300         | 13          | 196                      | 84         | 129          | 126        |
| Saugus, MA               | 462                    | 15%          | 28             | 17          | 29            | 16          | 6                        | 77         | NA           | NA         |
| Philadelphia, PA         | 33,686                 | 20%          | 1,535          | 22          | 610           | 56          | 99                       | 341        | 100          | 337        |
| Scottsdale, AZ           | 2,891                  | 10.9%        | 246            | 11.8        | 230           | 12.6        | 39.4                     | 73         | 28.4         | 102        |
| Seattle, WA              | 7,281                  | 12.5%        | 548.8          | 13.3        | 823.3         | 8.8         | 82.2                     | 89         | 60.2         | 121        |
| Shelby Cty (Memphis), TN | 14556                  | 12.7%        | 852            | 17.1        | 768           | 19.0        | 55                       | 265        | 60           | 243        |
| St. Paul, MN             | 7,152                  | 18.8%        | 523            | 13.7        | 536           | 13.3        | 97                       | 74         | 19           | 376        |
| Stockton, CA             | 4,436                  | 11.2%        | 258            | 17.2        | 344           | 12.9        | 47                       | 94.0       | 36           | 123        |
| Sun Prairie, WI          | 697                    | 10%          | 62             | 12          | 93            | 8           | 14                       | 50         | 7            | 100        |
| Tacoma, WA               | 3,894                  | 12%          | 172.5          | 23          | 223           | 17          | 33.6                     | 116        | 27           | 144        |
| Tucson, SD               | 8,092                  | 14%          | 409            | 20          | 419           | 20          | 61                       | 133        | 54           | 150        |
| Washoe County, NV        | 8,551                  | 14%          | 472            | 19          | 325           | 27          | 77                       | 112        | 37           | 232        |
| Williamson County, TN    | 2,824                  | 9%           | 213            | 13          | 400           | 7           | 34                       | 121        | 23           | 178        |
| West Aurora, IL          | 1688                   | 13%          | 120            | 14          | 101           | 17          | 21                       | 80         | 13           | 130        |
| Worcester, MA            | 5,172                  | 21%          | 254            | 21          | 366           | 15          | 38                       | 137        | NA           | NA         |
| <b>Averages</b>          |                        | <b>13.9%</b> |                | <b>13.9</b> |               | <b>14.3</b> |                          | <b>118</b> |              | <b>173</b> |

\*This data was collected by PCG team members through reviews conducted by PCG, the Council of the Great City Schools, and the Urban Collaborative/Leading Equity and Inclusive Education. *The data do not give precise comparisons, so the results need to be used with caution.* District data are not consistently reported (e.g., some districts include contractual personnel and others may exclude them) and are sometimes affected by varying placement types used by a school district. The data may count all students with IEPs, including those placed in charters, agencies, and nonpublic schools. Still, these data are the best available and are useful as a rough guide to staffing ratios.

\*\* Data includes psychologists and educational diagnosticians.

| Ratios for Social Workers,<br>Nurses, OTs & PTs | # IEPs      | Social Workers |            | Nurses (School/RN) |           | Occupational<br>Therapists |            | Physical Therapists |               |
|---|-------------|----------------|------------|--------------------|-----------|----------------------------|------------|---------------------|---------------|
|   |             | Number         | Ratio      | Number             | Ratio     | Number                     | Ratio      | Number              | Ratio         |
| Agawam Pub Schools, MA                          | 656         | NA             | NA         | 8                  | 82        | 3                          | 219        | 3                   | 219           |
| Anchorage School Dist., AK                      | 4,950       | NA             | NA         | 112.8              | 60        | 21.9                       | 309        | 7.8                 | 869           |
| Albuquerque School District, NM                 | 16,738      | 98.5           | 169.9      | N/A                | N/A       | 65.3                       | 256        | 22.7                | 737           |
| Atlanta Public Schools, GA                      | 6,779       | 30             | 165        | 58                 | 85        | 12                         | 413        | 3                   | 1650          |
| Arlington Pub Schools,, MD                      | 2952        | 15             | 197        | *30                | 98        | 20                         | 147        | 6                   | 492           |
| Austin Pub S D, TX                              | 9,450       | NA             | NA         | NA                 | NA        | 12.6                       | 751        | 12                  | 760           |
| Baltimore City Public, MD                       | 12,719      | 194.1          | 66         | NA                 | NA        | 38                         | 335        | 11                  | 1156          |
| Baltimore County Pub Sc, MD                     | 12,127      | 48.7           | 249        | 179.8              | 67        | 65.2                       | 186        | 27                  | 449           |
| Bellevue, WA SD                                 | 11,534      | 4              | 487        | 13.2               | 148       | 5.3                        | 367        | 5.3                 | 367           |
| Boston Public Schools, MA                       | 1,293       | 52.1           | 201        | 128                | 82        | 60                         | 175        | 21                  | 499           |
| Bridgeport, CT                                  | 2,618       | 38             | 69         | 28                 | 94        | 7                          | 374        | 2                   | 1309          |
| Buffalo Public Schools, NY                      | 7744        | 48.5           | 160        | NA                 | NA        | 75                         | 103        | 29                  | 267           |
| Cambridge Pub School, MA                        | 1,200       | 16             | 75         | 0                  | NA        | 16                         | 75         | 7                   | 172           |
| Carpentersville, IL                             | 3,139       | 36.5           | 86         | 27.5               | 114       | 22                         | 142        | 6                   | 523           |
| Chicago Pub Schools, IL                         | 54,376      | 355.7          | 142        | 334                | 151       | 115                        | 440        | 35                  | 1445          |
| Cincinnati Pub Sch, OH                          | 8,928       | NA             | NA         | NA                 | NA        | 19                         | 470        | 5                   | 1786          |
| Clark Cty School Dist, NV                       | 40,067      | NA             | NA         | 194.5              | 206       | 69.5                       | 577        | 28                  | 1431          |
| Cleve Hts-UnivHtsCty, OH                        | 1,100       | 7              | 158        | 5                  | 220       | 2                          | 550        | 1                   | 1100          |
| Cleveland Metropolitan, OH                      | 37,890      | NA             | NA         | 69                 | 113       | 36                         | 216        | 9                   | 864           |
| Columbus City, OH                               | 9,727       | 36             | 270        | 103                | 94        | 43                         | 226        | 24                  | 405           |
| Compton CA                                      | 2981        | 1              | 2981       | 1                  | 2981      | 1.5                        | 1987       | .5                  | 5962          |
| Dallas, TX                                      | 13,470      | 7              | 1924       | NA                 | NA        | 14.5                       | 929        | 4                   | 3368          |
| DeKalb 428, IL                                  | 879         | 8              | 110        | 7                  | 126       | 3.4                        | 256        | 1.3                 | 204           |
| DesMoines Public Schls, IL                      | 4,854       | 25.8           | 188        | 58.4               | 83        | 7                          | 693        | 4.8                 | 1011          |
| D.C. Public Schools                             | 8,603       | 90             | 96         | 127                | 68        | 48                         | 180        | 16                  | 538           |
| Davenport CommSch, IA                           | 1,857       | NA             | NA         | 7                  | 266       | NA                         | NA         | NA                  | NA            |
| Deer Valley Unified SD, AZ                      | 3,289       | NA             | NA         | 37                 | 89        | 19                         | 174        | 4                   | 823           |
| Denver Public Schools, CO                       | 9,142       | 74             | 124        | 77                 | 119       | 25                         | 366        | 12                  | 762           |
| Detroit Public Schools, MI                      | 8,731       | 76             | 115        | 38                 | 230       | 31.6                       | 276        | 10                  | 873           |
| Elgin U-46, IL                                  | 1,987       | 56             | 95         | 59.5               | 89        | 25.2                       | 210        | 4                   | 1326          |
| ESD 112, WA                                     | 5,304       | NA             | NA         | 5                  | 398       | 6                          | 332        | 3                   | 663           |
| Everett Public Schools, WA                      | 1,049       | 2              | 525        | 11                 | 96        | 2                          | 525        | 3                   | 350           |
| Fort Worth, TX                                  | 6,144       | NA             | NA         | 106                | 58        | 16                         | 384        | 10                  | 615           |
| Fresno, CA                                      | 8,271       | 33.5           | 247        | 53.1               | 1156      | 3                          | 2757       | NA                  | NA            |
| <b>Garland Indept School Dist, TX</b>           | <b>5393</b> | <b>0</b>       | <b>N/A</b> | <b>89</b>          | <b>61</b> | <b>12</b>                  | <b>449</b> | <b>5</b>            | <b>1078.6</b> |
| Greenville County, SC                           | 9,894       | 20             | 495        | 132                | 75        | 14                         | 707        | 4                   | 2574          |
| Guilford County, SC                             | 10,062      | 75             | 134        | 39                 | 258       | 24.7                       | 407        | 11                  | 958           |
| Houston Independence SD, TX                     | 15,655      | NA             | NA         | NA                 | NA        | NA                         | NA         | NA                  | NA            |
| Jackson County, FL                              | 2,740       | 25             | 110        | BA                 | NA        | 6                          | 457        | 3                   | 913           |
| Kalamazoo Pub, MI                               | 1,667       | 5              | 334        | 2                  | 834       | 4                          | 417        | 3                   | 556           |
| Kent, WA Pub Schools                            | 3,069       | 2.2            | NA         | NA                 | NA        | 12.8                       | 240        | 4.8                 | 639           |
| Kyrene School District, AZ                      | 3,145       | NA             | NA         | 4                  | 386       | 2                          | 772        | 2                   | 772           |
| Lake Washington SD, WA                          | 1,544       | NA             | NA         | 23.6               | 133       | 19.3                       | 163        | 3.3                 | 953           |
| Lakota, OH                                      | 1,800       | 6              | 300        | 14                 | 129       | 8                          | 225        | 2                   | 900           |
| Los Angeles Unified SD, CA                      | 71,969      | 361.6          | 199        | 6                  | 122       | 189.9                      | 379        | 41                  | 1743          |
| Madison, WI Public Schools                      | 3,808       | 68             | 56         | 38                 | 100       | 34                         | 112        | 13                  | 293           |
| Marlborough Pub Schools, MA                     | 1,198       | 9              | 134        | 10                 | 120       | 4                          | 300        | 2                   | 599           |
| Memphis City, TN                                | 16,637      | 55             | 303        | 68                 | 245       | 11                         | 1513       | 9                   | 1849          |
| Miami-Dade, FL                                  | 40,012      | NA             | NA         | 206                | 195       | 65                         | 616        | 23                  | 1740          |
| Montgomery Cty Schools, MD                      | 16,406      | NA             | NA         | NA                 | NA        | 112                        | 154        | 61                  | 283           |
| Milwaukee, WI                                   | 17,226      | 140            | 117        | 101                | 162       | 30                         | 547        | 13                  | 1262          |
| Naperville, IL 203                              | 1978        | 27             | 73         | 29                 | 68        | 4                          | 494        | 3                   | 659           |
| Nashville, TN                                   | 10,141      | NA             | NA         | 57                 | 178       | 29.5                       | 344        | 6                   | 1690          |
| New Bedford, MA                                 | 2,655       | 67             | 40         | 30                 | 89        | 11                         | 242        | 3                   | 885           |
| Norfolk Public Schools, VA                      | 4329        | 23             | 188        | 50                 | 87        | 4                          | 1082       | 6                   | 722           |
| North Chicago, IL                               | 875         | 10             | 61.4       | NA                 | NA        | 3.6                        | 170.5      | 1.6                 | 383.8         |
| Oak Park Sch Dist 97, IL                        | 614         | 12             | 73         | 8                  | 110       | 7                          | 1125       | 1                   | 875           |
| Oakland Unified SD, CA                          | 4,210       | 19             | 284        | 30.8               | 175       | 12                         | 450        | 2                   | 2701          |
| Omaha, NE                                       | 9,149       | 56             | 163        | 74                 | 124       | NA                         | NA         | NA                  | NA            |
| Orange County, FL                               | 24,385      | 67             | 364        | 108                | 226       | 10.5                       | 2322       | 7                   | 348           |
| Pittsburgh Pub Schools, PN                      | 5401        | 40             | 105        | 40.6               | 104       | 7                          | 601        | 8                   | 526           |

| Ratios for Social Workers,<br>Nurses, OTs & PTs | # IEPs | Social Workers |            | Nurses (School/RN) |            | Occupational<br>Therapists |            | Physical Therapists |              |
|---|--------|----------------|------------|--------------------|------------|----------------------------|------------|---------------------|--------------|
|   |        | Number         | Ratio      | Number             | Ratio      | Number                     | Ratio      | Number              | Ratio        |
| Pinellas County, FL                             | 14,701 | 108            | 136        | 128                | 115        | 56                         | 263        | 23                  | 650          |
| Portland, OR                                    | 7,168  | 14             | 512        | NA                 | NA         | 20.2                       | 355        | 5.3                 | 1352         |
| Providence, NJ                                  | 4460   | 35             | 127        | NA                 | NA         | 11.5                       | 388        | 4.5                 | 991          |
| Renton, WA                                      | 2,108  | 0              | NA         | 17                 | 124        | 15                         | 141        | 3                   | 703          |
| Rockford IL Pub Schools, IL                     | 5,472  | 26             | 135        | 32                 | 127        | 12.5                       | 325        | 4.5                 | 903          |
| Rochester, NY                                   | 4,065  | 89             | 61.5       | 55.5               | 98.6       | 29.2                       | 187.4      | 11                  | 497.5        |
| Round Rock, TX                                  | 3,313  | NA             | NA         | 1                  | NA         | 10                         | 332        | 3                   | 1105         |
| Sacramento, CA                                  | 6,519  | 8              | NA         | 5*                 | NA         | 2                          | NA         | 0                   | NA           |
| San Diego Unified SD, CA                        | 16,300 | NA             | NA         | 129                | 127        | 40                         | 408        | 10                  | 1630         |
| Saugus, MA                                      | 462    | 4              | 116        | 5                  | 93         | 2                          | 231        | 1                   | 462          |
| Schl Dist of Philadelphia, PN                   | 33,686 | NA             | NA         | 280                | 121        | 20                         | 1685       | 20                  | 1685         |
| Scottsdale, AZ                                  | 2,891  | NA             | NA         | 31                 | 93         | 13.8                       | 210        | 3.8                 | 761          |
| Seattle, WA                                     | 7,281  | NA             | NA         | NA                 | NA         | 44                         | 165        | 1                   | 662          |
| Shelby County (Memphis), TN                     | 14556  | 66             | 221        | 79                 | 184        | 29.22                      | 498        | 2.84                | 1134         |
| St. Paul Pub Schools, MN                        | 7,152  | 92             | 78         | 33                 | 217        | 36                         | 199        | 12                  | 596          |
| Stockton, CA                                    | 4,436  | 3              | 1479       | 22.3               | 199        | 3                          | 1479       | 1.6                 | 2773         |
| Sun Prairie Area S Dist, WI                     | 697    | 8              | 88         | 1                  | NA         | 5                          | 140        | 2                   | 349          |
| Tacoma Pub Schools, WA                          | 3,894  | NA             | NA         | 1.2                | NA         | 19                         | 205        | 11                  | 354          |
| Tucson Unified SD                               | 8,092  | 26             | 312        | 53                 | 153        | 10                         | 810        | 4                   | 2023         |
| Washoe Cty Sc Dist, WA                          | 8,551  | NA             | NA         | 35                 | 248        | 12                         | 713        | 7                   | 1222         |
| West Aurora SD, IL                              | 2,824  | 19             | 89         | 7                  | 241        | 11                         | 154        | 7                   | 241          |
| Williamson City Schools, TN                     | 1688   | NA             | NA         | 37                 | 111        | 22                         | 187        | 5                   | 819          |
| Worcester, MA                                   | 5,172  | NA             | NA         | NA                 | NA         | 12                         | 431        | 5                   | 1035         |
| <b>Averages</b>                                 |        |                | <b>256</b> |                    | <b>166</b> |                            | <b>379</b> |                     | <b>1,012</b> |

**Percent Students with IEPs of Total Enrollment & Students with IEPs to Staff Ratio in Ascending Order**

This table shows each school district's staff to student ratios by personnel area, which are listed from lowest to highest ratios.

| Rank | % IEPs | Special Educators | Paraeducators | Speech/Lang Pathologists | Psychologists | Social Workers | Nurses | Occupational Therapists | Physical Therapists |
|------|--------|-------------------|---------------|--------------------------|---------------|----------------|--------|-------------------------|---------------------|
| 1    | 8%     | 7                 | 4.3           | 26                       | 31            | 26             | 58     | 64                      | 128                 |
| 2    | 8%     | 7                 | 5.26          | 37                       | 55            | 40             | 61     | 75                      | 172                 |
| 3    | 9%     | 8.6               | 6.3           | 44                       | 64            | 56             | 60     | 103                     | 219                 |
| 4    | 9%     | 9                 | 7             | 44                       | 77.7          | 61             | 62     | 112                     | 241                 |
| 5    | 9%     | 9                 | 7             | 47                       | 85.5          | 67             | 64     | 140                     | 283                 |
| 6    | 9%     | 9.1               | 7             | 50                       | 79            | 69             | 67     | 141                     | 293                 |
| 7    | 10%    | 9.5               | 7             | 58                       | 90            | 73             | 68     | 142                     | 349                 |
| 8    | 10%    | 9.8               | 7             | 59                       | 94            | 73             | 75     | 147                     | 350                 |
| 9    | 10%    | 9.8               | 8             | 59                       | 100           | 75             | 82     | 154                     | 354                 |
| 10   | 10%    | 10                | 8             | 60                       | 100           | 78             | 83     | 154                     | 367                 |
| 11   | 10.3%  | 10                | 8             | 63                       | 102           | 82             | 85     | 163                     | 384                 |
| 12   | 11%    | 10                | 8.3           | 65                       | 104           | 86             | 87     | 171                     | 449                 |
| 13   | 11%    | 10.3              | 8.5           | 68                       | 110           | 88             | 89     | 172                     | 462                 |
| 14   | 11%    | 10.9              | 8.6           | 71                       | 110           | 89             | 89     | 174                     | 492                 |
| 15   | 11%    | 11                | 9.7           | 71                       | 111           | 95             | 89     | 180                     | 498                 |
| 16   | 11.2%  | 11                | 9.7           | 73                       | 111           | 96             | 93     | 186                     | 523                 |
| 17   | 11.2%  | 11                | 10            | 73                       | 112           | 105            | 93     | 187                     | 526                 |
| 18   | 11.3%  | 11                | 10            | 74                       | 113           | 115            | 94     | 18                      | 538                 |
| 19   | 11.4%  | 11.36             | 10            | 74                       | 115           | 116            | 96     | 199                     | 556                 |
| 20   | 12%    | 11.4              | 11            | 76                       | 117           | 124            | 98     | 205                     | 596                 |
| 21   | 12%    | 11.7              | 11            | 77                       | 121           | 126            | 98.6   | 210                     | 599                 |
| 22   | 12%    | 12                | 11.1          | 78                       | 123           | 127            | 100    | 211                     | 615                 |
| 23   | 12%    | 12                | 12            | 79                       | 123           | 134            | 104    | 216                     | 620                 |
| 24   | 12%    | 12                | 12            | 80                       | 124           | 135            | 110    | 219                     | 639                 |
| 25   | 12%    | 12                | 12.6          | 80                       | 125           | 140            | 111    | 225                     | 659                 |
| 26   | 12%    | 12                | 12.8          | 80                       | 127           | 142            | 113    | 231                     | 663                 |
| 27   | 12.3%  | 12                | 12.9          | 81                       | 128           | 153            | 114    | 240                     | 676                 |
| 28   | 12.69% | 12.3              | 12.9          | 83                       | 129           | 158            | 115    | 242                     | 680                 |
| 29   | 12.5%  | 12.5              | 13            | 84                       | 130           | 160            | 119    | 256                     | 703                 |
| 30   | 12.7%  | 13                | 13            | 85                       | 134           | 163            | 119    | 276                     | 722                 |
| 31   | 13%    | 13                | 13            | 89                       | 138           | 170            | 120    | 265                     | 724                 |
| 32   | 13%    | 13                | 13            | 93                       | 140           | 188            | 121    | 285                     | 737                 |
| 33   | 13.1%  | 13                | 13            | 94                       | 142           | 197            | 124    | 300                     | 761                 |
| 34   | 13.5%  | 13                | 13            | 94.6                     | 144           | 221            | 126    | 309                     | 762                 |
| 35   | 13.7%  | 13                | 13            | 95                       | 150           | 249            | 127    | 325                     | 772                 |
| 36   | 13.9%  | 13.4              | 13            | 95                       | 151           | 284            | 127    | 326                     | 819                 |
| 37   | 14%    | 13.7              | 13            | 96                       | 154           | 300            | 129    | 332                     | 823                 |
| 38   | 14%    | 13.8              | 13            | 96.5                     | 155           | 300            | 133    | 332                     | 864                 |
| 39   | 14%    | 14                | 13.5          | 98                       | 155           | 303            | 142    | 344                     | 869                 |
| 40   | 14%    | 14                | 14            | 100                      | 159           | 312            | 144    | 366                     | 873                 |
| 41   | 14%    | 14                | 14            | 102.6                    | 166           | 334            | 148    | 367                     | 875                 |
| 42   | 14%    | 14                | 14            | 103                      | 169           | 384            | 153    | 374                     | 885                 |
| 43   | 14%    | 14                | 14.2          | 04                       | 171           | 487            | 155    | 384                     | 900                 |
| 44   | 14%    | 14                | 15            | 104                      | 178           | 495            | 162    | 388                     | 903                 |
| 45   | 14%    | 14                | 15            | 105                      | 178           | 525            | 163    | 408                     | 953                 |
| 46   | 14%    | 14.5              | 15            | 105                      | 179           | 652            | 165    | 413                     | 991                 |
| 47   | 14.1%  | 14.9              | 15            | 106                      | 188           | 673            | 175    | 417                     | 1011                |
| 48   | 14.1%  | 15                | 15.9          | 108                      | 195           | 705            | 178    | 424                     | 1078.6              |
| 49   | 14.7%  | 15                | 16            | 111                      | 198           |                | 184    | 431                     | 1035                |
| 50   | 15%    | 15                | 16            | 111                      | 199           |                | 186    | 449                     | 1079                |
| 51   | 15%    | 15                | 16            | 112                      | 208           |                | 195    | 450                     | 1100                |
| 52   | 15%    | 15.2              | 16.4          | 112                      | 210           |                | 199    | 470                     | 1100                |
| 53   | 15.3%  | 15.7              | 16.6          | 112                      | 213           |                | 206    | 473                     | 1105                |
| 54   | 15.4%  | 16.0              | 16.6          | 114                      | 213.7         |                | 217    | 474                     | 1134                |
| 55   | 16%    | 16.3              | 17            | 115                      | 218           |                | 220    | 477                     | 1134                |

| Rank        | % IEPs       | Special Educators | Paraeducators | Speech/Lang Pathologists | Psychologists | Social Workers | Nurses     | Occupational Therapists | Physical Therapists |
|-------------|--------------|-------------------|---------------|--------------------------|---------------|----------------|------------|-------------------------|---------------------|
| 56          | 16%          | 16.3              | 17            | 116                      | 219           |                | 230        | 494                     | 1222                |
| 57          | 16%          | 17                | 17.1          | 117                      | 223           |                | 241        | 498                     | 1262                |
| 58          | 16.2%        | 17                | 17.6          | 121                      | 225           |                | 245        | 518                     | 1309                |
| 59          | 17%          | 17                | 18            | 124                      | 232           |                | 248        | 525                     | 1326                |
| 60          | 17.3%        | 17.1              | 18            | 127                      | 233           |                | 266        | 547                     | 1431                |
| 61          | 17.7%        | 17.2              | 18.4          | 12                       | 240           |                | 386        | 550                     | 1488                |
| 62          | 18%          | 18.9              | 19            | 130                      | 243           |                | 398        | 577                     | 1532                |
| 63          | 18%          | 19                | 19            | 133                      | 263           |                | 700        | 601                     | 1553                |
| 64          | 18%          | 19                | 19.4          | 135                      | 265           |                | 834        | 616                     | 1630                |
| 65          | 18%          | 19                | 20            | 136                      | 281           |                |            | 644                     | 1650                |
| 66          | 18.1%        | 19                | 20            | 137                      | 295           |                |            | 693                     | 1685                |
| 67          | 19%          | 19.5              | 20            | 139                      | 300           |                |            | 702                     | 1690                |
| 68          | 19%          | 20                | 20.5          | 140                      | 319           |                |            | 713                     | 1740                |
| 69          | 19.3%        | 20.3              | 21            | 144                      | 337           |                |            | 772                     | 1786                |
| 70          | 19.4%        | 20.6              | 21            | 158                      | 376           |                |            | 810                     | 1849                |
| 71          | 20%          | 21                | 22            | 172                      | 396           |                |            | 1029                    | 2023                |
| 72          | 20%          | 21                | 22            | 192                      | 599           |                |            | 1082                    | 2187                |
| 73          | 20%          | 21                | 24            | 218                      |               |                |            | 1125                    | 2574                |
| 74          | 20.4%        | 22                | 25            | 263                      |               |                |            | 1479                    | 2574                |
| 75          | 20.5%        | 22.6              | 26            | 265                      |               |                |            | 1513                    | 2701                |
| 76          | 20.9%        | 23                | 26            | 314                      |               |                |            | 1685                    | 2773                |
| 77          | 21%          | 23.5              | 27            | 341                      |               |                |            |                         | 2941                |
| 78          | 21%          | 24                | 31            | 596                      |               |                |            |                         |                     |
| 79          | 21%          | 24                | 33            |                          |               |                |            |                         |                     |
| 80          |              | 37                | 56            |                          |               |                |            |                         |                     |
| <b>Avg.</b> | <b>13.7%</b> | <b>14.1</b>       | <b>14.4</b>   | <b>119</b>               | <b>171</b>    | <b>247</b>     | <b>165</b> | <b>377</b>              | <b>1,008</b>        |

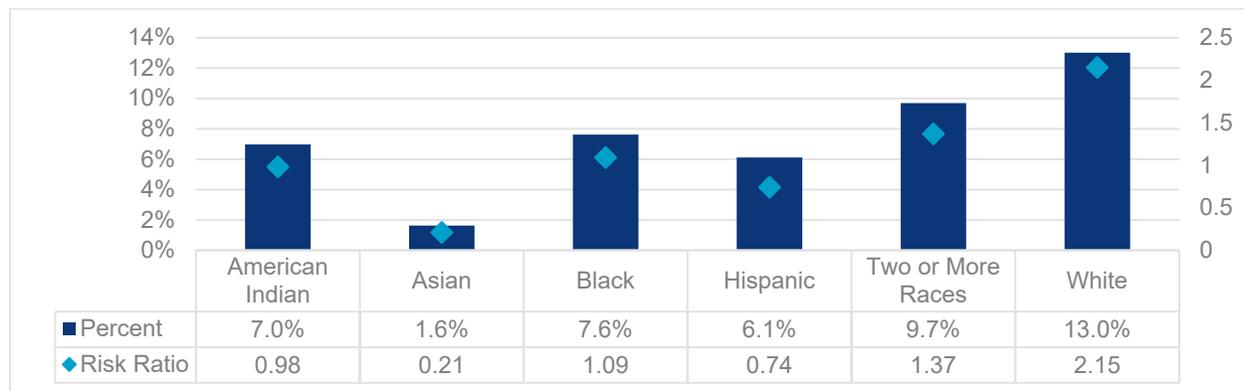
## B. Section 504 Qualification

Overall, 3,840 (7.12%) of all GISD students were qualified under Section 504. The district's percentage is higher than the Texas rate of 6.86%.<sup>124</sup> These students were eligible to receive supplementary aids and services. Procedural safeguards also apply to identification, evaluation, placement and suspension/expulsion processes.

### Section 504 Qualification by Race/Ethnicity

Of all students qualified under Section 504, in ascending order, 13.0% were White, 9.7% were students of two or more races, 7.6% were Black, 7.0% were American Indian and 1.6% were Asian. With a risk ratio of 2.15, White students were most likely to be Section 504 qualified. Students with two or more races had the next highest risk ratio (1.37) and Asian students were underrepresented with a risk ratio of 0.21.

**Exhibit 122. Composition of Section 504 Eligible Students by Race/Ethnicity and Associated Risk Ratios**



### Section 504 Qualification by Grade

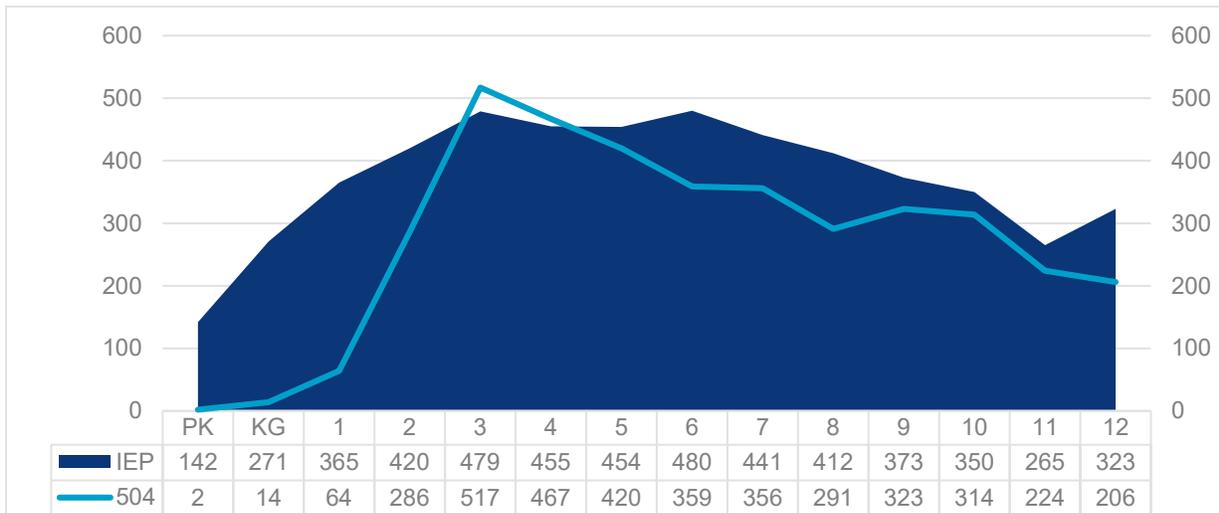
The pattern of students qualified for supplementary aids/services under Section 504 by grade was different than for identified students receiving special education pursuant to an IEP under IDEA.

**Special Education.** The 142 students in prekindergarten grew quickly and remained at the mid to high 400s from grade 3 through grade 7, then gradually decreased to grade 11 (265 students). The higher number of 323 students at grade 12 included students remaining in school for transition services.

**Section 504 Services.** This group grew slowly from kindergarten's two students to grade 2's 64 students. By grade 2 the number climbed to 286 students and then almost doubled in grade 3 to 517 students. The number decreased in grade 4 (467) and grade 5 (420). From grades 6 through 11 the numbers fluctuated between 224 and 359 and finished in grade 12 with 206 students.

<sup>124</sup> Enrollment in Texas Public Schools 2019-20 @ <file:///Users/suegamm/Dropbox/sues%20stuff/Garland%20ISD,%20TX/TEA%20data%20.pdf>

**Exhibit 123. Number of Students Qualified Under Section 504 and IDEA by Grade**



## C. Project Team Bios

**Dr. Jennifer Meller**, Associate Solutions Manager at PCG, leads the firm's efforts in providing districts with comprehensive special education program evaluations and technical assistance in the areas of staffing, stakeholder engagement, compliance, finance, data use, and best instructional practices for students with disabilities. A special education subject matter expert (SME) at PCG, Dr. Meller's experience is built upon her practitioner-oriented background and education policy work across several dozen states across the US. Currently, Dr. Meller focuses on engagements that support districts and state departments of education with special education with identifying and implementing best practices. She also assists districts in several states with implementing IEP special education technology systems that are both procedurally-compliant and outcomes-focused. She designed and has administered PCG's national survey on the use of IEP systems and regularly authors thought leadership pieces about special education. Prior to joining PCG, Jennifer was the Director of Operations in the School District of Philadelphia's Office of Specialized Instructional Services, where she focused on implementing student-focused data management systems, oversaw several multi-million dollar federal grants, and was responsible for policy and compliance. Jennifer earned an Ed.D. in Educational and Organizational Leadership and an MS.Ed. in Higher Education Management, both from the University of Pennsylvania. She also has a B.A. in English from Dickinson College.

**Christine Donis-Keller, PhD.**, has worked in the field of education and evaluation research for 25 years and joined PCG Education as an evaluation specialist in June 2011. Recent evaluation work at PCG includes the evaluation of implementation and impact of: a district-wide arts initiative in Hartford Public Schools; a 21st Century Community Learning Center for middle school students in Jersey City, NJ; a Family and Community Engagement grant project in Bridgeton, NJ; and the State Systemic Improvement Plan in Indiana. Additional work includes an impact evaluation of a statewide project to support charter schools' transition to the state standards in Florida, and the impact evaluation of the statewide Tennessee Academic Specialists Program which provided coaching support in the state's lowest performing schools. She has also worked on progress monitoring in Level 4 and 5 schools in Massachusetts, a needs assessment for Head Start or Broward County, FL, and set of best practice case studies for the Georgia Governor's Office of Student Achievement's Connections for Classrooms program. Data collection and analysis for these projects included the development of research instruments and protocols and conducting interviews, focus groups, surveys, and case studies to understand program effectiveness. Dr. Donis-Keller has led evaluations on the implementation of the Annenberg Challenge grant to New York City to foster the growth of smaller learning environments, and a five-year evaluation of a national school reform model focused on K-3 literacy. She has also evaluated the implementation of the International Baccalaureate program in Title I high schools and an inclusion program for students with autism in New York City public schools. She led a three-year research study of school district consolidation in Maine, interviewing hundreds of stakeholders in communities, schools, districts, and state policy-makers including members of the legislature and the Governor's office. She has researched additional topics including the four-day school week. She has worked as a research consultant for several organizations including the National Association for State Boards of Education and the Institute for Educational Leadership and served as foundation program staff at the Japan Foundation Center for Global Partnership. Dr. Donis-Keller received her doctorate in the sociology of education from New York University. She has published reports on theme high schools, the four-day school week, and school district reorganization.

**Sue Gamm, Esq.**, has blended her legal and special education programmatic expertise, unique experience as a cabinet-member large urban school district administrator, and federal civil rights advocate to become a highly regarded national special education expert as an author, presenter, consultant and evaluator of system wide policies and practices. Ms. Gamm has consulted with the Public Consulting Group (PCG) since her retirement in 2004 from the Chicago Public Schools (CPS) as its Chief Specialized Services Officer. With CPS, Ms. Gamm managed special education and student support services, alternative education, gifted and talented services, and safe and drug free school programs. Responsible for

overseeing a budget of more than \$600 million, services for 57,000 children with disabilities in over 600 schools, and supervision of about 1,800 staff, she initiated a variety of data-based management strategies to support decision-making, accountability and communication. Prior to CPS, Ms. Gamm was employed by the Office for Civil Rights (OCR), U.S. Department of Education, where she served as an assistant civil rights attorney and District Director with responsibility for elementary and secondary compliance and technical assistance activities in Illinois, Wisconsin and Minnesota. Her civil rights work concentrated on the areas of disability, race/ethnicity and gender.

In addition to PCG, Ms. Gamm also works with the Urban Special Education Leadership Collaborative and the Council of Great City Schools. Independently and through these organizations, she has provided consultation services to states (IL, LA, RI and NV) and school districts in over 20 states, including New York City, Los Angeles, Chicago, San Diego, Boston, New Orleans, Philadelphia, Baltimore, Washington DC, St. Paul, St. Louis, Atlanta, Austin, Hartford, Yonkers, Rochester, Milwaukee, Guilford County (NC), Richmond (VA), Charleston (SC); and a charter school organization in Illinois. Ms. Gamm has also used her expertise on behalf of school districts involved in federal litigation, including involvement with the Council of Great City Schools' draft of amicus curiae briefs supporting school districts in two recent U.S. Supreme Court special education cases.

From her unique perspective as an attorney, Federal official, urban school district cabinet member and special educator, Ms. Gamm has shared her knowledge of IDEA and its related issues at numerous national, state and local conferences. In addition to writing articles, periodicals and special education policy and procedural manuals, she co-authored with Dr. Thomas Hehir *Special Education: from Legalism to Collaboration*, in *Law and School Reform: Six Strategies for Promoting Educational Equity*. Ms. Gamm also wrote three LRP Publications: *Disproportionality in Special Education: Determining When and Why Over identification of Minority Students Occurs*; *Cracking the Code: IDEA and NCLB Alternate Assessment Rules Made Simple*; and *When OCR Comes Calling: An Insider's Guide to Handling Disability Complaint Investigations and Compliance Reviews*. Finally, in recognition of her expertise, she has been asked to testify about special education matters before the U.S. Senate Finance Committee, the U.S. Senate HELP Committee, the Illinois legislature, and the President's Commission on Excellence in Special Education's Accountability Systems Task Force.

**Mary Baker-Boudissa**, is a Project Specialist for Project SUCCESS in Indiana. Prior to coming to PCG, Mary served as a career and employment coach for adults. She is an advocate for programs and services that improve educational opportunities for all students. She has over a decade of experience in higher education, K-12 assessment, training, and communications. While working as Assistant Director for the Office of Charter School Research at Ball State University, Mary coordinated academic growth assessments for charter schools throughout Indiana. She is active in promoting prevention of and raising awareness about sex trafficking and exploitation among parents, teachers, and healthcare workers. Mary is a graduate of Harvard University and holds a Master of Arts in Educational Psychology. She is a member of the policy council for Head Start in Anderson, Indiana. Additional areas of expertise include workforce development, business development, and trauma-informed care and services.

**Mauria Uhlik, Ed.D.**, joined PCG in June 2021 as a Senior Advisor. Prior to her tenure at PCG she served in a variety of roles including Director of Early Stages in DC Public Schools, Adjunct Professor at Towson and Johns Hopkins University, and Educational Specialist in the Division of Special Education and Early Intervention at Maryland State Department of Education. In January 2015, Dr. Uhlik began her doctorate in Educational Leadership and Management with a Special Education Leadership Concentration at Drexel University School of Education. She was selected as one of 10 doctoral candidates to participate in the Urban Special Education Leaders for Tomorrow Project (USELT), a 5-year OSEP funded Special Education Leadership Personnel Training Grant. She successfully defended her dissertation in May 2019. Most recently, Dr. Uhlik had the opportunity to serve as special educator throughout the COVID-19 pandemic.

**Matthew Scott** provides project support and coordination for PCG Education clients. Mr. Scott brings 10 years of education management experience specializing in accreditation, strategic planning, program quality review, learning assessment processes, and education policy. Prior to joining PCG, Mr. Scott spent 7 years as the Director of Institutional Effectiveness, Accreditation, and Regulatory Affairs for a specialized graduate school. In this capacity, Mr. Scott oversaw a portfolio of strategic growth and regulatory initiatives, including an initial institutional accreditation effort, new program development, enrollment management, and state approval processes. Mr. Scott began his career as a student advisor and leadership development professional for the University of the Pacific. Mr. Scott earned a M.A in Educational Administration and Leadership from the University of the Pacific, and a B.A. in Political Science from California State University, Long Beach.