

**An Audit of Programs & Services for
Students with Disabilities in the
San Francisco Unified School District**



Urban Special Education Leadership Collaborative
Education Development Center, Inc.

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BACKGROUND

In the spring of 2010, the San Francisco Unified School District (SFUSD) contracted with the Urban Special Education Leadership Collaborative (the Collaborative) to conduct a comprehensive review of programs and services offered by the school district to students with disabilities. The Collaborative, housed at Education Development Center, Inc., is a national network of more than 100 school districts committed to improving outcomes for students with disabilities. In addition to 16 years of experience in providing leadership development and networking opportunities to its membership of special and general education administrators, the Collaborative offers a range of customized technical assistance and professional development services that focus on some of the most pressing issues affecting urban school districts. Among these are the following:

- Designing policies, procedures, and organizational structures that promote improved student achievement as dictated by state and federal requirements (e.g., the Individuals with Disabilities Education Act and the No Child Left Behind Act)
- Developing and expanding inclusive practices
- Creating culturally responsive educational systems
- Reducing the disproportionate representation of culturally and linguistically diverse students in special education programs
- Designing, implementing, and evaluating effective multitiered academic and behavioral support systems
- Creating internal complaint management and accountability systems
- Improving student academic and postsecondary outcomes

Throughout its history, the Collaborative has organized and delivered technical assistance to more than 50 local education agencies and state departments of education. In all contract engagements, the Collaborative approaches its work as a “critical friend”—asking probing questions, examining data through multiple lenses, and offering concrete recommendations with a full appreciation of what is already in place and working well. The goal of its technical assistance work is to assist education agencies in their efforts to improve outcomes and opportunities for students with disabilities and other diverse learners.

The Collaborative organized a Core Team of experienced educational leaders to identify organizational, programmatic, policy, procedural, resource allocation, and service delivery improvements that SFUSD might implement to enhance student outcomes, address gaps in achievement for students with disabilities, and conform to standards of contemporary best practice. The Core Team was composed of the following members:

- Mr. Ronald Felton, associate director of the Urban Special Education Leadership Collaborative. Most recently Mr. Felton was the CEO of the Bertha Abess Children’s Center, a nonprofit children’s mental health center providing day treatment and educational services to over 1,500 students in the Miami-Dade County Public Schools. Mr. Felton retired after 30 years with the Miami-Dade

County Public Schools where, as an assistant superintendent and subsequently as associate superintendent, he was responsible for a wide range of programs in such areas as special education, student services, Title I, charter schools/schools of choice (including magnet programs), and Medicaid reimbursement. He managed well over \$50 million in budgets across a number of programs and worked extensively on two major district reorganizations. He led the development of the first data warehouse for use in the district's Division of Special Education to monitor student performance, discipline, and school completion. Mr. Felton also successfully collaborated with parent and advocacy groups in the development of more inclusive programs for students with disabilities. He served on the school district's Narrowing the Achievement Gap Committee and has been a consultant to the Bureau of Exceptional Education and Student Services, Florida Department of Education.

- Dr. Elise Frattura, associate dean for education outreach and associate professor in the departments of exceptional education and administrative leadership at the School of Education at the University of Wisconsin–Milwaukee. Dr. Frattura researches and publishes in the area of nondiscrimination law, integrated comprehensive services for all learners, and the theoretical underpinnings of educational segregation. She works with school districts across the nation to assist administrators in developing comprehensive organizational structures to better meet the individual needs of all learners. Dr. Frattura was a K–12 public school director of student services and special education for 12 years. During that time she served as an adjunct professor at UW-Madison, teaching courses related to diversity in elementary and secondary administration of services for students with disabilities. Dr. Frattura has written articles in the area of administration and leadership in support of inclusion for all learners, and is co-author of the books *Leading for Social Justice: Transforming Schools for All Learners* (2007) and *Meeting the Needs of Students of All Abilities: How Leaders Go Beyond Inclusion* (2009).
- Ms. Charlene Green, deputy superintendent for student support services in the Clark County (Nevada) School District. Ms. Green is responsible for the provision of services to students with disabilities, gifted students, English language learners, and Title I students. She also oversees the departments of equity and diversity, charter schools, grant development and administration, student threat evaluation and crisis management, and the Adult English Language Learner Program. During her career in education, which has spanned more than 40 years, Ms. Green has been a teacher, special education director, and senior administrator in districts in Indianapolis and Chicago as well as Clark County. She has also served as a consultant for several urban districts, including Baltimore City Public Schools, New Haven Public Schools, and the Los Angeles Unified School District.

- Dr. Caroline Parker, senior research scientist in the Learning and Teaching Division, Education Development Center, Inc. Dr. Parker is the principal investigator for two NSF-funded research studies: the Project RISE Pilot Study, which is developing methodological tools for a longitudinal study of the effects of informal science education programs on youth participation in high school STEM classes, and a study of the role of Innovative Technology Experiences for Students and Teachers (ITEST) professional development programs on teaching practices. She is co-principal investigator of the ITEST Learning Resource Center, which is responsible for the development of the ITEST Management Information System. She is also a lead researcher with the Regional Educational Laboratory Northeast and Islands, conducting studies on large-scale assessment, English language learners, and students with disabilities, and leads a U.S. Department of Education study in collaboration with five states and Measured Progress that is conducting interviews with 10th- and 11th-grade students with disabilities to understand their cognitive processes during reading assessments.
- Dr. David Riley, executive director of the Collaborative. Dr. Riley served as team chair and has more than 25 years of experience working with school districts on numerous special education policy, organizational, programmatic, and compliance issues. As executive director of the Collaborative and co-leader of several national initiatives, he has become intimate with both theory and best practices in developing inclusive schools, fostering student retention, and creating culturally responsive educational systems. For the past 16 years, Dr. Riley has served as co-chair of the Summer Institute on Critical Issues in Urban Special Education at the Harvard Graduate School of Education.

Over the past several months, Core Team members reviewed and analyzed data files, reports, training materials, policies and procedures, program descriptions, organizational charts and role descriptions, state records, and other documents (see Appendix C for a list of documents reviewed). In March and May 2010, the Core Team spent a total of six days onsite interviewing more than 100 San Francisco education professionals, parents, parent leaders, and others who could provide insight and perspective on the above areas of concern as well as recommendations for how outcomes for students with disabilities might be improved (see Appendix A for a list of individuals interviewed). During the May 2010 visit, members of the team also visited eight schools (see Appendix B for a list of schools). The purpose of these activities was to generate recommendations that would assist the school district in its efforts to improve outcomes for students with disabilities who receive special education services.

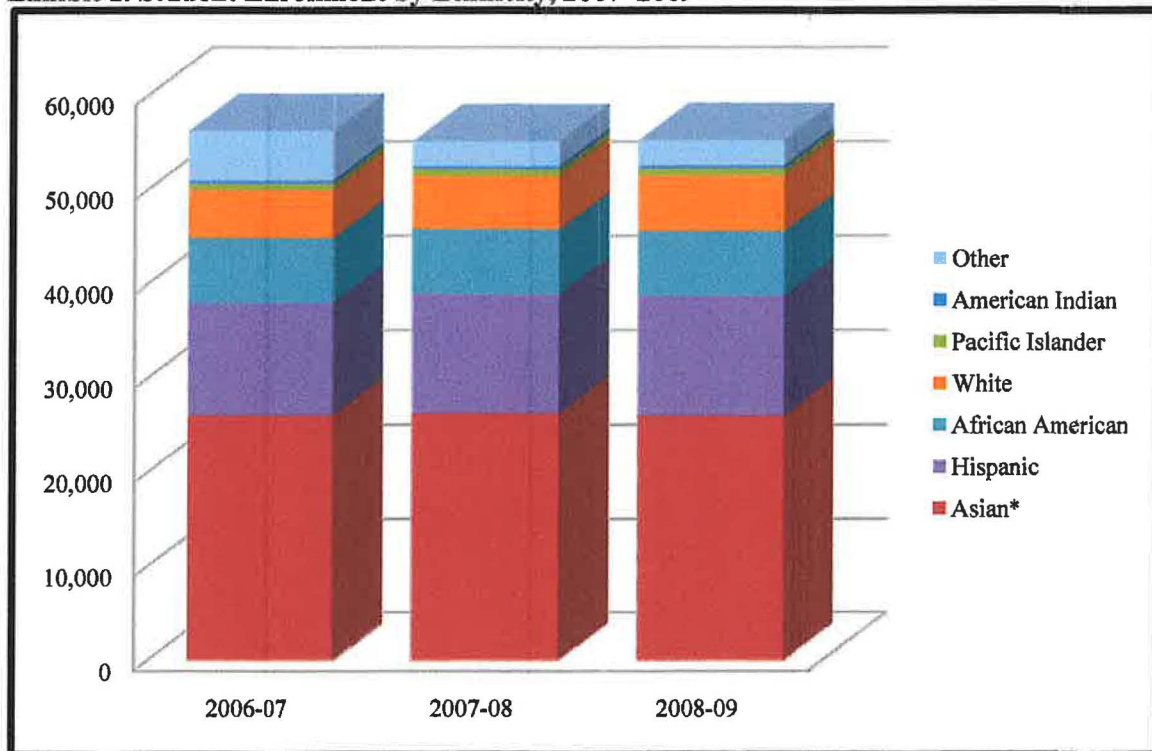
The Core Team's final report is divided into the following three main sections:

- Demographic Context
- Core Team Findings
 - Infrastructure
 - Service Delivery and Instructional Practices
 - Professional Development

DEMOGRAPHIC CONTEXT

The San Francisco Unified School District (SFUSD) is among the nation's 100 largest school districts, with an enrollment of 53,952 K–12 students and 140 schools. Nearly one-third of the student population is Asian, with Hispanics¹ (23%) and African Americans (11%) comprising the second and third largest racial/ethnic groups in the district. Ten percent of the school district's population is classified as White (Exhibit 1).²

Exhibit 1. Student Enrollment by Ethnicity, 2007–2009



Data Source: <http://www.ed-data.k12.ca.us/Navigation/IsTwoPanel.asp?bottom=/searchpage.asp?searchtype=name>.

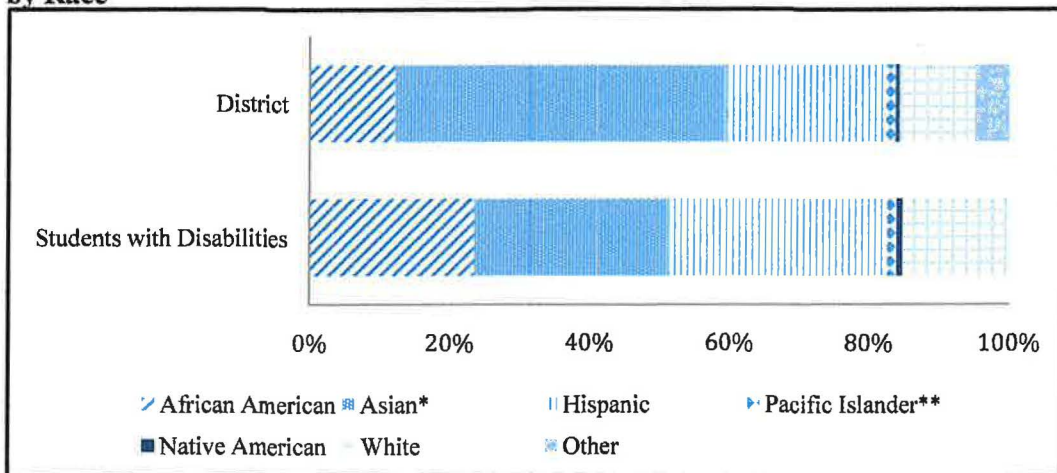
*The term *Asian* includes Chinese, Japanese, Korean, and Filipino students as well as other students of Asian descent.

¹ The term Hispanic, rather than Latino, is used in this report to maintain consistency with how data are reported in the California Special Education Management Information System (CASEMIS)

² This report uses data sources from both the school district and the state, each of which use slightly different categorizations of race/ethnicity. Tables and figures use the demographic categories provided to the Core Team and, thus, there are some differences in how race/ethnicity is described across the report. The report also notes the few instances when race/ethnicity categories have been collapsed.

The school district serves 6,296 students with disabilities (PreK–12),³ which is 11% of the total district population. Hispanics and African Americans, who together make up 35% of the total student population, constitute 55% of the total population of students with disabilities, while Asians make up 27% of the population of students with disabilities (Exhibit 2).

Exhibit 2. Students with Disabilities, by Race, Compared to All Students in District, by Race



Data Source: CASEMIS Table A 2007–2009 (crosstab files) and California Department of Education.

*The term *Asian* includes Chinese, Japanese, Korean, and Filipino students as well as other students of Asian descent.

**The term *Pacific Islander* includes Samoan and Hawaiian students as well as other students of Pacific Island descent. California Department of Education race/ethnicity categories include the term *Other*, which may include subsets of Asian and/or Pacific Islander students. The CASEMIS data for San Francisco placed all students in a category.]

Exhibit 3. Students with Disabilities by Category, 2007–2009

Category	2007	2008	2009
Mental Retardation	422	447	446
Hard of Hearing	119	126	103
Deaf	20	26	31
Speech or Language Impairment	1,602	1,524	1,667
Visually Impairment	42	37	34
Emotional Disturbance	387	381	420
Orthopedic Impairment	78	89	89
Other Health Impairment	380	440	541
Specific Learning Disability	2,537	2,293	2,368
Deaf-Blindness	0	1	1

³ California Special Education Management Information System (CASEMIS) Data -12/2009

Multiple Disabilities	79	61	65
Autism	373	454	524
Traumatic Brain Injury	4	6	7
Total	6,043	5,885	6,296

Data Source: SELPA:3800 San Francisco Unified SELPA SAN FRANCISCO UNIFIED (3868478)

As reflected in Exhibit 3, the district's special education enrollment has remained fairly steady, rising 4% from 2007 to 2009. However, the number of students classified as autistic has increased by 40% in the same time period. Of additional note is that, as a segment of all students with disabilities, the proportion of students who are African American and identified as disabled is more than double the proportion of African American students in SFUSD overall (Exhibit 4). This point is discussed in detail in Section I of this report.

Exhibit 4. Students with Disabilities by Category and Race (Percentages)

Category	% African American	% Asian	% Pacific Islanders	% Hispanic	% Native American	% White
Mental Retardation	23.5	37.0	1.1	26.2	0.4	11.7
Hard of Hearing	3.9	44.7	2.9	34.0	1.0	13.6
Deaf	6.5	48.4	0.0	25.8	0.0	19.4
Speech or Language	13.9	31.0	1.7	38.9	0.4	14.1
Visual Impairment	11.8	32.4	2.9	32.4	0.0	20.6
Emotional Disturbance	49.3	12.1	1.4	20.7	1.9	14.5
Orthopedic Impairment	4.5	40.4	0.0	22.5	1.1	31.5
Other Health Impairment	32.0	21.8	2.0	23.1	0.9	20.1
Established Medical Disability	25.0	25.0	25.0	0.0	0.0	25.0
Specific Learning Disability	29.1	21.0	1.1	35.6	0.9	12.3
Deaf-Blindness	0.0	0.0	0.0	0.0	0.0	100.0
Multiple Disability	24.6	29.2	0.0	23.1	0.0	23.1
Autism	8.6	48.7	0.6	15.5	0.6	26.1
Traumatic Brain Injury	42.9	14.3	14.3	14.3	14.3	0.0
All students with disabilities	23.6	27.5	1.4	31.6	0.8	15.2
All students in school district	12.3	47.1	1.3	23.1	0.6	10.8

Data Source: CASEMIS Table A 2009

CORE TEAM FINDINGS

Section I: Infrastructure

POSITIVE FINDINGS

- The school district's strategic plan is a bold document that thoughtfully addresses the issues of access, equity, and achievement for all students and provides a foundation for developing effective programs and resources for students with disabilities.
- The superintendent and his leadership team are acting upon a philosophy, grounded in the concept of social justice, that includes all students and articulates a vision for the district and its schools that can lead to the breaking down of institutional silos and facilitate greater access to the general education curriculum for students with disabilities.
- Members of the Board of Education expressed support for efforts to make significant and positive changes in the way the school district provides services to students with disabilities and their parents.
- The Department of Learning Support & Equity, which includes Special Education Services, has taken steps to improve communication with parents and the schools.
- The workgroup involved with the development and implementation of the school district's revised student assignment plan has active involvement by staff from Special Education Services and is seeking ways to ensure equity in the process for students with disabilities and their families.

CONCERNS

A. Organizational Orientation

SOCIAL JUSTICE

"We believe access and equity are at the heart of making social justice a reality. The politics and ideology of social justice are empty without daily actions that improve the living and learning conditions for the children of San Francisco."

(Beyond the Talk: Taking Action to Educate Every Child Now. SFUSD 2008–2012 Strategic Plan.)

Lee Anne Bell defines social justice as "full and equal participation of all groups in a society that is mutually shaped to meet their needs."⁴ Time and again, in pursuit of

⁴ Maurianne Adams, Lee Anne Bell, & Pat Griffin, eds., *Teaching for Diversity and Social Justice: A Sourcebook* (London: Routledge, 1997), p.3 .

educational equity and social justice for students who have been pushed to the margins of schools, teachers and administrators too often rely on program-specific initiatives that perpetuate the fragmentation of services. The high-stakes testing required by No Child Left Behind (NCLB) has assisted in bringing about data-driven reform efforts. However, absent a vision of educational social justice that includes students with disabilities, the services implemented as a result of such efforts are frequently inefficient and ineffective.

One disturbing phenomenon noted by all of the Core Team members was the frequent use of the term *encroachment* when many school district administrators discussed special education programs and services and their costs in terms of the impact on the district's budget. The use of this term suggests a view of special education and the students it serves as existing apart from the general education program and as a drain on resources that could (or should) be used for other students. Furthermore, and maybe increasingly important, the term *encroachment* suggests that students with disabilities are unwanted and are taking away time, space, resources, energy from more deserving or nondisabled students. Such a tone adversely affects every aspect of service delivery for students with disabilities, from the perceptions of special education teachers and other support staff to the treatment of students and families of students with disabilities. The term works in opposition to Bell's definition of social justice as full and equal participation of all groups in a society that is mutually shaped to meet their needs, where no one is perceived as "encroaching" upon someone else's educational opportunities.⁵

In addition, in contrast to the bold vision set forth in its strategic plan, SFUSD lacks a clear agenda for how it can provide equity and access to students with disabilities, improve expectations for their achievement, and implement the accountability structures necessary to ensure results. In interviews at the central office level, at schools, and in the community, this lack of clear parameters was consistently noted. One reason for this is that the school district's orientation to the education of students with disabilities is grounded in an out-dated model that is focused on programs rather than services. Much professional activity, energy, and resources are focused upon the placement and movement of programs and students in and out of schools rather than being focused on establishing best practices for proactively supporting students with disabilities and improving instructional outcomes. These efforts often result in the creation of new and additional programs for students perceived as increasingly complex and resulting in fragmented and disconnected services for these students.

It is not unusual for school systems and educators, when measuring student performance, to assume that service structure, staff design, staff development, and teacher evaluation plans are not part of such an inquiry. However, in ignoring these essential elements of quality service delivery, they often continue to segregate students, and the cycle of failure therefore continues.⁶ Historically, school leaders attended to the use of instructional

⁵ Ibid., p. 3.

⁶ Leonard C. Burrello, Carl Lashley, & Edith E. Beatty, *Educating All Students Together: How School Leaders Create Unified Systems*. Newbury Park, CA: Corwin Press, 2000.

techniques, building teacher capacity, advancing curricular practices, and developing policies based on new legislation with an underlying assumption that self-contained program models are effective or the perception that they are the only venue for individualized/specially designed instruction. SFUSD data regarding the disproportionate number of students of color in self-contained settings or nonpublic placements and especially in the upper grades (Exhibit 6), correlated with the increase achievement gap between students with disabilities and their nondisabled peers increasing with age (Exhibit 12), calls the question of “how” services are offered to students who are eligible. When little energy is spent on the structure of how schools service the growing population of students who meet eligibility through federal nondiscrimination regulations (i.e., English language learners, students with disabilities), they may often – although unintentionally – perpetuate a more segregated system, denying students of color instruction from content experts and standard-based curriculum along with their nondisabled peers.

School district leaders are under extreme pressure to assess, collect, and report student achievement data as part of NCLB. At the same time, those leaders are under significant mandates to collect compliance data in the area of special education under the IDEA. Resolving issues around compliance is important, in that failure to do so can lead to the school district having to divert even more fiscal and human resources to remedying lapses. However, educational leaders often function under the belief that compliance with IDEA requirements is commensurate with providing quality services for students with disabilities. If SFUSD aims simply for compliance, quality of services for students with disabilities will remain an elusive goal; however, if SFUSD aims to achieve a more integrated model of service delivery, SFUSD will provide one of high quality as well as of equity and social justice.

DISPROPORTIONALITY AND RISK RATIOS

In addressing educational equity and social justice, it is important not only to examine the type of model (program versus services) and where a child receives his/her education but also to carefully address the issue of disproportionate representation of minority groups in special education. For example, in SFUSD, African American students make up about 11% of the school district’s overall population, yet they account for close to 24% of its special education population and nearly half (49.3%) of the students identified as emotionally disturbed. These numbers alone indicate that there is a disproportionate number of African American students in the special education population. Another common statistical method for analyzing disproportionality is the “risk ratio.”⁷ The risk

Colleen A. Capper & Elise M. Frattura, *Meeting the Needs of Students of All Abilities: How Leaders Go Beyond Inclusion*. Newbury Park, CA: Corwin Press, 2009.

Wayne Sailor & Blair Roger, Rethinking inclusion: School-wide applications. *Phi Delta Kappan* 86(7), 2005, 503–509.

⁷ Risk ratio = Risk for racial/ethnic group for disability category / Risk for comparison group for disability category
Risk = (# of students of particular race in specific disability category / # of students of particular race)*100.

ratio, when applied to African American students identified with emotional disturbance, answers the question “What is the likelihood that African American students are being identified as emotionally disturbed as compared to students from other race/ethnic groups?”⁸ A risk ratio of 1.00 would indicate that African American students are no more likely than students from all other racial/ethnic groups to be identified as emotionally disturbed. The actual risk ratio for African American students being identified as emotionally disturbed is 7.0. That is, African American students are *seven times more likely* to be identified with emotional disturbance than all other groups.

A detailed examination of students receiving special education services by disability and race strongly suggests that several areas merit further attention, the most significant being the risk ratio for African American students with emotional disturbance as already described. In addition, Hispanic students represent 23% of the school district’s overall student population and 31.6% of the special education population, and make up a high percentage of the population in the categories of Hard of Hearing, Speech or Language, Visual Impairment, and Specific Learning Disability (see Exhibit 4).

Exhibit 5 indicates risk ratios for those categories of students at a higher risk for receiving special education and related services for specific disability categories. Those with an asterisk have also been identified by the state as having disproportionate representation based on its methodology for identifying areas of significant disproportionality.

Exhibit 5. Risk Ratios for Specific Race and Disability Categories

Category	Risk Ratio
*Hispanic with Speech and Language	2.1
*Hispanic with Specific Learning Disability	1.8
*White with Autism	2.9
White with Other Health Impairment	2.1
African American with Mental Retardation	2.1
*African American with Emotional Disturbance	7.0
African American with Specific Learning Disability	2.9
*African American with Other Health Impairment	3.4

Data Source: CASEMIS Table A 2009

* Areas in which the State of California has identified SFUSD as having disproportionate overrepresentation⁹

⁸ Westat (2007) *Methods for Assessing Racial/Ethnic Disproportionality in Special Education: A Technical Assistance Guide* Washington, DC: Westat, n.d. (available at <http://www.ideadata.org/docs/Disproportionality%20Technical%20Assistance%20Guide.pdf>)

⁹ California Department of Education 2008–09 District-Level Special Education Annual Performance Report Measure for San Francisco Unified School District.

In May 2010, the school district received a letter from the California Department of Education regarding the results of a special education self-review to determine the extent to which any disproportionate representation occurring during the 2008-2009 school year was the result of inappropriate identification. CDE has required the district to correct individual instances of non-compliance related to disproportionality that were identified in that self-review. Additionally the school district must submit a corrective action plan identifying specific steps the district has taken/will take to address systemic issues “to ensure that remedies are in place to address practices, policies, and procedures that may have led to the disproportionate representation.”

It should be noted that the number of students involved in the risk ratio analysis were rather small and that the Core Team did not conduct a statistical test for significance. However, the findings of the analysis, coupled with CDE’s assessment, warrant further analysis on the part of the school district to determine what contributes to these findings.

PARENTAL ENGAGEMENT AND COMMUNITY INVOLVEMENT

The Core Team met with and received written input from parents of students with disabilities as well as representatives of advocacy agencies providing supports to those parents. With a significant degree of consistency, parents reported being frustrated with the school system and its seeming inability to address concerns and answer questions in a clear, consistent, and timely manner. The Special Educations Services department is not viewed as “user-friendly.” Many parents view “special education office” staff who attend IEP meetings as being obstructionists and more interested in controlling costs for the district than making sure that children receive the supports they need in order to succeed in school. Many parents, along with many school district employees with whom the Core Team met, also believe that those parents who are able to apply the most pressure (e.g., threaten to or, in fact, an advocate or attorney) are more likely to have their concerns addressed than those parents without the means, time, or knowledge about the law. The Special Education Services department has an ombudsperson—a former district PTA president—who has tried to provide information to parents through the school system’s website, but within the current organizational structure this officer cannot significantly impact the concerns and issues affecting parents of students with disabilities. The Core Team did note that, during the past year, the leadership in Special Education Services has been reaching out to parent organizations and advisory groups to improve communication. Additionally, it is not clear that the school district’s Community Advisory Committee for Special Education has been able to function in a way that would support SFUSD’s efforts to engage parents and the community.

B. Organizational Structure

“In the words of Superintendent Carlos Garcia, ‘We will do whatever it takes to ensure that we have adequate funding and support for every student to meet the high expectations we’ve described in our plan.’ To foster the accountability we’re calling for in this plan, district staff and community will need to work closely together to describe what those ‘high expectations’ are in every part of SFUSD.”

(Beyond the Talk: Taking Action to Educate Every Child Now. SFUSD 2008–2012 Strategic Plan.)

For a number of years, the Special Education Services department—currently part of the Department of Learning Support & Equity—has not had the benefit of leadership that (1) was consistent; (2) focused primarily on improving outcomes for students with disabilities rather than on process and compliance; (3) held and conveyed a vision for how services to students with disabilities should be provided in the school district; (4) viewed as an integral part of the school district’s plan to “overcome the predictive power of demographics” and narrow the achievement gap. The Special Education Services department has been largely disconnected from the work of the Department of Academics and Professional Development (APD) and those involved in supporting curriculum and instruction in the schools as well as with the work of Leadership, Equity, Achievement, and Design (LEAD)—the office charged, according to the school district’s website, with providing leadership and support to school sites in the effort to fulfill the goals of the strategic plan. Although the situation varies widely, many schools lack a consistent sense of accountability and ownership for special education services and for many students with disabilities, particularly those in special day classes (SDCs).

The work of the Special Education Services department has been largely organized around the administrative divisions of elementary instruction, secondary instruction, and Designated Instruction and Services (DIS). Each of the elementary and secondary divisions has a supervisor and a number of content specialists, who are not administrators but teachers on special assignment and serve as the front-line representatives of the central office to the schools. The role of the content specialist is not defined in a role description and varies depending upon the division to which the person is assigned. However, it is clear that, in most cases, the position as operationalized in Special Education Services department is focused on compliance-related activities and crisis management. Even more important, the work of the content specialists is not linked to the efforts of other central office staff charged with supporting schools, specifically in the area of curriculum and instruction. Some content specialists noted that, as teachers on special assignment, they have no authority to effect significant change in schools, especially in light of the absence of a unified vision and plan for proactive service delivery at the central office level. Many also expressed frustration at the lack of time for fuller engagement in work that directly supports improving the delivery of content to students with disabilities. Their current roles are discipline-specific and cross-district, resulting in a reactionary model rather than one that is aligned with a proactive general education curricular and instructional model. In addition, with the possible exception of

the supervisor of Designated Instruction and Services (DIS), supervisors currently have very little involvement in the provision of professional development. In interviews, many departmental staff members expressed the desire to be more engaged in directly supporting the delivery of instruction but noted that they spent an inordinate amount of time “putting out fires.”

Designated Instruction and Services (DIS) is the entity responsible for the provision of evaluative and support services and for the professionals who provide those services. These are speech pathologists, physical and occupational therapists, and nurses; school psychologists are not part of DIS. Some interviewees expressed concern about the division’s current scheduling model for services such as speech therapy. The model, known as 3-1, requires service providers to deliver direct service for three weeks out of four and provides a week for paperwork, professional development, or other work-related activities. Parents expressed concern that this model disrupts the continuity of service delivery to children and drives what is perceived as a tendency for providers to restrict the amount of service provided to students.

Both school-level staff and parents frequently cited the lack of guidance from the department and the difficulty in getting clear and consistent answers to questions or concerns. Sindelar, Shearer, Yendol-Hoppey, and Liebert¹⁰ identified factors necessary to sustaining the proactive delivery of services for students with disabilities. These researchers followed a middle school for four years, focusing on the sustainability of inclusive education.

When inclusion was not sustained, they identified three factors to help explain why: changes in leadership, teacher turnover, and changes in state and district assessment policies. These changes in turn led to a reduction of resources and a loss of philosophical commitment to reform. The systemwide move from inclusion programs (that exist alongside special day classes) to inclusion (where the focus has been on restructuring school environments for increased collaboration between general and special education) was not in evidence in SFUSD. Certainly, leadership changes, particularly in the superintendency, have contributed to the failure of the school district to implement fully its vision for a “unified system”.

At the time of this report, plans are underway for a reorganization of the central office that includes the regionalization of supports to schools through the LEAD department. This move provides an opportunity to align the work of Special Education Services with that of the other central office leadership. However, there is a critical and immediate need to organize the Special Education Services department around a new purpose and mission that focuses on improving access and equity, promoting inclusion by integrating services into the general education instructional program, and—with the leaders of APD and

¹⁰ Paul T. Sindelar, Deirdre K. Shearer, Diane Yendol-Hoppey, & Todd W. Liebert, The sustainability of inclusive school reform. *Exceptional Children*, (72), 2006, 317-331.

LEAD—expanding the capacity of each school to serve a diverse student population through a comprehensive, cross-categorical model.

STUDENT ASSIGNMENT PRACTICES

In an effort to promote diversity and reduce racial isolation in its schools, SFUSD established a student placement process based on a mandatory choice system and a diversity index lottery. The system in place when the Core Team began its review was established in 2002 and provided families the opportunity to choose schools for their children from any across the school district regardless of home address. Parents were asked to select as many as seven schools, and a lottery system was used for schools with more requests than capacity in an attempt to ensure diversity. Due to the nature of the school district's service delivery model for students with disabilities (see Section II), parents of students with disabilities are not always afforded the same range of choices as are parents of students without disabilities. This is particularly true for students with low-incidence disabilities and those with emotional and behavioral disabilities. School placement of many students with disabilities in SFUSD is often a complex interaction among several factors: disability category, parental choice, program availability, space availability, and grade level.

The school district has acknowledged that the current system is in need of revision and, since 2008, has been working toward developing a new policy that would:

1. Reverse the trend of racial isolation and the concentration of underserved students in the same school.
2. Provide equitable access to the range of opportunities offered to students.
3. Provide transparency at every stage of the assignment process.¹¹

A new policy was approved in March 2010 that will be phased in over several years. It reportedly still offers parents districtwide choice but will take into account where a child resides when there are more applicants than available seats at a given school.¹² This policy addresses special education by first stating, "To the extent possible, given the unique needs of students as outlined in their IEP, the student assignment process used to assign general education students will be used to assign special education students," and then adds, "The Superintendent shall establish service attendance area boundaries for special education programs not available at every school." The Core Team noted that the Special Education Services department was engaged in the planning of the revisions and received input from parents of students with disabilities. It is likely, however, that the process will remain inequitable for students with disabilities and their families as long as the special education program delivery model remains segregated through classrooms and pull-out programs (see Section II for further details).

¹¹ SFUSD Board Of Education Policy Article 5 (P5101)

¹² Press Release, San Francisco Unified School District, March 10, 2010.

DATA AND DATA-BASED DECISION-MAKING

A critical concern for the Core Team is the availability, accessibility, and reliability of data about programs and services for students with disabilities. The ability to easily and quickly access, review, and analyze student data is key to improving the decision-making, accountability, and overall function of the Special Education Services department.

About three years ago, the school district purchased a special education student information management system that would allow staff to conduct queries into special education student data. Many interviewees expressed discontent with the system's reliability and reporting capabilities. The format and functioning of the system's IEP form were a matter of concern to administrators, teachers, and parents alike. Staff also spoke about being skeptical of the data housed in the system. Indeed, the Core Team requested data files relating to student placement in the Least Restrictive Environment (LRE)—specifically, team members wanted to examine the percentage of time students with disabilities were identified as being in regular education settings. Two data files were generated purporting to provide this information but were determined by the Core Team to be inaccurate, and school district staff later confirmed this assessment. As of this writing, the Core Team has been unable to obtain an accurate file. Given that these data are required by both state and federal governments, it is important that the district be confident in the system's output.

As with any student data management system, the accuracy, timeliness, and consistency of input by staff is critical to the quality of the output, and in SFUSD some of these factors could be improved. Nonetheless, the current special education student information management system poses significant problems in terms of how the user interface is meeting the needs of school-level staff and service providers as well as the district's special education leadership. Obviously, staff and administrators need to be able to create the reports that are critical to maintaining compliance and accurately informing decisions.

FUNDING AND BUDGET

The school district reports that expenditures for special education programs and services are approximately \$105,000,000 annually. An additional \$17,000,000 is spent on transportation costs for about 1,700 special education students. This total also includes expenditures of about \$14,000,000 for non-public school placements. Of the total of roughly \$122,000,000 in expenditures, \$42,000,000 (42%) comes from the Unrestricted General Fund (UGF)—the portion of the district's general operating fund used primarily for general and discretionary purposes. Funds used from the UGF to support special education programs are referred to as "encroachments."¹³

The Core Team also requested information about the funding model used to support

¹³ San Francisco Unified School District Recommended Budget for Fiscal Year 2009–2010 (Second Reading), June 23, 2009, p. 12.

current program delivery. It appears that special education students in inclusion programs, for example, are allotted their general education funding plus additional funding according to the school district's prescribed weight per student. In non-inclusion programs, a certain number of students with the same disability category are grouped together to fit a program (i.e., a class) and that results in the funding of a teacher and/or a paraprofessional. In other words, the school district funds staff by the number of students in a program.

School district personnel must be leery of a weighted-student formula or any other funding mechanisms that might violate IDEA by inadvertently supporting clustering or segregation. IDEA requires states and school districts to maintain a "placement neutral" funding formula. The 1997 amendments for IDEA had as one of its purposes "*to establish placement neutral funding formulas*" and the 2004 reauthorization further emphasized this requirement. A placement neutral funding formula is one that does not inadvertently reward school districts for segregating students who have disabilities; i.e., the distribution of funding does not provide fiscal incentives for placing students with disabilities in separate settings in violation of the least restrictive requirements (LRE) of the law.¹⁴

The IDEA provides funding to supplement, not supplant, education and related services for students with disabilities. It was not meant, nor is it sufficient, to fund all that is required to provide a free, appropriate public education (FAPE) to these students. The district currently receives about \$12,000,000 in IDEA funds. The largest expenditure—over \$5,000,000 for FY 2009—on the IDEA grant (identified as IDEA Basic Local Aid) is for instructional aides.

The information received from staff was not definitive enough to determine how expenditures are related to the school district's initiatives, so the Core Team researched the information on the SFUSD website. The published annual budget did not include sufficient detail to allow for a review of expenditures and how they support district initiatives.

The Core Team is concerned about the school district's ability to secure in a timely manner supplemental equipment and materials that are identified either through the IEP process or by school-level and related services personnel to support the instruction of students. At the time of the review there appeared to be confusion both at the school level and in the Special Education Services department about how such requests were handled and the approval chain for these requests. There is also concern that some needs are not being transmitted from the IEP team meetings to those with the authority to secure the required material.

¹⁴ Americans Institute for Research. Policy Alternatives for Special Education Funding in Illinois and Ahearn, E. (2010). Financing Special Education, State Funding Formulas. National Association of State Directors of Special Education.

Given the Core Team's concerns about the current program model, SFUSD can no longer ethically justify segregated service delivery and the tuitioning out of students with disabilities to non-public schools. This is particularly the case when such programs deny students a comprehensive education with their nondisabled peers and siblings in the schools they would attend if not disabled, result in overidentification of African American students, and produce low achievement scores and excessive behavioral referrals. These concerns will be discussed in detail in Section II.

The capacity for each school to proactively serve any child who attends that school by neighborhood or by choice (see Section II) can be attained through the reallocation of resources currently supporting separate units or programs in non-neighborhood public schools as well as nonpublic school placements, not to mention the administrative and transportation costs associated with such a model.¹⁵ The move to an inclusive and integrated delivery model will necessitate a rethinking of the school district's current budgeting process as it relates to special education, including the use of the weighted student formula.

RECOMMENDATIONS

Organizational Orientation

- The leadership of SFUSD must clearly and unequivocally articulate a unified vision for the school district relative to students with disabilities, consistent with its strategic plan, that (1) establishes the goal of building capacity at each and every school to meet the needs of each and every student using an integrated comprehensive, and inclusive model of service delivery; (2) provides students with disabilities and their families the opportunity to receive the same school attendance choices as all other students; and (3) reflects the same high expectations as those set forth for all students.
- School principals must understand that they are responsible and accountable for all students in their schools, including those receiving special education services. This accountability must be backed up with a districtwide data-driven accountability system that focuses on the success all students, including students with disabilities.
- Efforts to expand and improve communication with individual parents and the advocacy community should continue, along with consideration of the role of the Community Advisory Committee for Special Education.

¹⁵ Allan Odden & Sarah Archibald, *Reallocating Resources: How to Boost Student Achievement Without Asking for More*. Thousand Oaks, CA: Corwin Press, 2001.

- The school district must conduct an in-depth analysis of its disproportionality percentages, and, in particular, why students of color are at significantly greater risk than other students to be indentified as having selected disabilities.

Organizational Structure

- An immediate interim reorganization of the Special Education Services department should be set in motion. It needs to be made clear that, in light of the anticipated reorganization of the school district and, specifically, the Instruction, Innovation, and Social Justice department, this interim structure will be revisited and revised again in 2011. The critical aspects of this interim reorganization are:
 - The creation of a single entity, under the direction of one supervisor, focused on compliance issues and activities. The primary purpose of this unit will be to support principals and school-based staff in maintaining compliance with federal and state mandates, and to provide clear written procedures and the professional development required to hold schools accountable for timely and accurate student records and data input. Assigned staff, as a team, will also be responsible for the monitoring and reviewing of districtwide compliance data and will assist schools in monitoring data. This team should provide monthly reports that include specific recommendations for meeting compliance standards to the LEAD administrators.
 - The elimination of the position of content specialist and its replacement with the position of instructional support specialist. These positions, under the direction of the assistant superintendent, are to lead a districtwide service-delivery team to assist in the transformation of the service delivery model. Instructional support specialists promote equitable access to all educational opportunities, ensure the participation of students with disabilities in grade-level, general education curriculum as well as extracurricular activities, and facilitate the development of high quality instruction through model teaching, coaching, and other strategies. Once the school district's overall reorganization is in place, the activities of these individuals should be aligned to the work of the LEAD department and other district-level staff supporting curriculum and instruction for all students with an emphasis on customizing instructional supports for schools in a comprehensive and cross-categorical manner by grade level.
 - The provision of cross-categorical proactive support to schools using general and special education specialists through the school district's new regionalized support structure.

Student Assignment Practices

- The establishment of service attendance area boundaries for special education programs contained in the school district's new student assignment policy must be viewed as a temporary measure as the district moves to an integrated service

model for students with disabilities (see Section III). Board policy should be revised to eliminate this provision as soon as possible but no later than 2013.

Data and Data-Based Decision-Making

- An immediate review of the school district's special education student information management system should be conducted to assess its functionality, accuracy, and efficiency. Input is needed from users at the school and central office levels to determine how to improve:
 - accuracy of data input and reporting
 - the user interface in order to minimize errors, omissions, and confusion, including the elimination of unnecessary data fields that are not state or federal reporting requirements and do not provide essential information for monitoring special education programs and services
 - the user interface in order to simplify the IEP development process for parents and professionals
 - access to data at the central office and school level in order to support quality improvement, compliance monitoring and placement decisions
 - the professional development training and materials required to ensure accurate, timely, and consistent data input

- After input is received from the users, the assistant superintendent, in consultation with the Information Technology department, should convene a meeting with the vendor to discuss necessary changes. Once confidence in the accuracy of the data has been restored, administrators must plan for how these data are to be used to improve accountability at all levels.

Funding and Budget

- The assistant superintendent for Special Education Services should be responsible for budget development and management of the IDEA grant and the expenditure of funds. The assistant superintendent, with input from key stakeholders, should be responsible and accountable for annually reviewing the grant budgets and making allocations based on the needs of SFUSD students with disabilities. This authority allows the leadership of special education programs and services to review the budget with an eye toward eliminating items that have no proven results for students and adding or enhancing line items that do have specific purposes. This increased autonomy connects resources to responsibility for results. Budget Services can promote this active engagement by assisting program staff with the online template, but program decisions should be left to the Special Education Services department. After drafting the grant budget, Budget Services would then be given the budget for careful review and detailed adjustments for submission to the funding agency.

- The Special Education Services department, in consultation with the Budget Services office as appropriate, should:
 - Evaluate the effectiveness of expenditures on student achievement in the local plan on an annual basis
 - Eliminate expenditures that show minimal results
 - Remove and re-budget items in special education grants that are not supplemental
 - Hold program staff accountable for funding decisions

- The Budget Services Office, in consultation with Special Education Services department, should:
 - Provide program staff assistance with the budget template for calculation purposes
 - Decentralize budget development to allow program staff to fully manage and develop the local plan budget each year to fund programs that supplement school district programs for the achievement of students with disabilities
 - Allow for amendments based on student needs as they arise throughout the year
 - Update budget narrative information on the school district's website in a way that ties the budget to student outcomes to ensure transparency
 - Revisit the current budgeting model, including the weighted student formula, to support an integrated service delivery model (see Section II).

Section II: Service Delivery and Instructional Practices

“All students need access to a rigorous academic curriculum and high-quality instruction, based on content and performance standards.”

(Beyond the Talk: Taking Action to Educate Every Child Now. SFUSD 2008–2012 Strategic Plan.)

POSITIVE FINDINGS

- An active and engaged group of professionals both in the school district and in the community have promoted and continue to support inclusive practices in the schools.
- Certain schools, as a result of building-level leadership, are using inclusive practices and are working to find ways to support students with disabilities in general education classrooms.

CONCERNS

“SFUSD envisions one unified system that provides educational equity and excellence for all its students. The District will be initiating major systemic reform to create a paradigm shift that rejects the notion of separate general and special education systems.” (1999)¹⁶

A. Service Delivery

PROGRAMMATIC ORIENTATION

Special Education Services in SFUSD are predominantly arranged programmatically by classroom type (e.g., special day class) and disability category. Indeed, even “inclusion” is a program type that can co-exist with special day classes in schools that are not fully engaged in inclusive practices. This default model has led to:

- The creation of a separate set of student assignment practices that do not offer many students with disabilities and their parents the same school choice opportunities. Depending on the disability category and the educational setting deemed appropriate by the IEP team, parents of students with disabilities are offered a narrower range of school choices that may result in long travel distances and sibling separation.
- Grade configurations for some special education programs require students to change schools because a program is not offered at all grade levels at particular schools.

¹⁶ *Establishing an Inclusive Educational System in the SFUSD: Report from the Management Study Group to Superintendent Waldemar Rojas (1999)*

- When classes of a certain type are full, new ones are typically created in school sites that have space, and this policy can lead to students being required to bypass schools closer to their homes in order to attend schools that have available classrooms.

One concern that school-level staff frequently brought up in conversation was student placement and what are viewed by many as the inappropriate placement of students into programs. District leaders provide very little clarity on what types of students are appropriate for the classes that the school district establishes, what types of instruction and support services are required to serve these students, and how services are best delivered. In one school, the staff was told that an SDC class was being designated for students who are classified as speech and language impaired. When the teacher was asked by one of the members of the Core Team what that meant, the teacher could not explain how instruction and services were being tailored for the population of students she was being assigned, and she indicated that guidance on how the class was to be structured was not provided by the Special Education Services department. The teacher also noted that she was being assigned students who were not appropriate for the program.

Indeed, school-level staff frequently spoke of students who “did not fit” or who “were not working out” in the programs to which they were assigned and that these students belonged “somewhere else” (i.e., in a program that the school does not have). Staff expressed much frustration with the time it reportedly takes to move students whom the school staff believes are not succeeding. Such phenomena persist when students with disabilities are served through a categorical model based on the type and severity of disability (emotionally or behaviorally disturbed, specific learning disabilities, autism, etc).

Teachers, parents, and administrators in SFUSD reported that student placements are primarily driven by availability of supports, classes, instructional resources, and/or teacher preference, and that students often move as a group to such activities as lunch, art class, and adapted physical education. In short, special education students are, in most cases, situated apart from the general education system.

According to much of the literature, program models lead to isolated and inferior learning opportunities for students and a lack of access to resources for students within the general educational setting. Program models isolate students from those with content expertise and the general education curriculum, thus denying students educational equity and the potential for excellence in academic achievement.¹⁷ Teachers and other support staff in

¹⁷ Jeannie Oakes & Martin Lipton, *Teaching to Change the World* (Boston, MA: McGraw-Hill College, 1999).

Leonard C. Burrello et al., *Educating All Students Together*.

Jeannie Oakes, *Keeping Track: How Schools Structure Inequality*, 2nd edition (New Haven, CT: Yale University Press, 2005) may be a useful resource for Indian Prairie educators

Jeannie Oakes, Keeping track, part 1: The policy and practice of curriculum inequality. *Phi Beta Kappan* 68(1), Sept. 1986, pp. 12–17

SFUSD also spoke of their own isolation and feelings of marginalization from their general education colleagues. As the SFUSD data show, students of color—and particularly African Americans—are placed in more segregated and restrictive programs than other students with disabilities. Equally important is the fact that the program model approach and the practice of labeling students has failed to result in high student achievement as measured by standardized test scores or post-school outcomes.

LEAST RESTRICTIVE ENVIRONMENT (LRE)

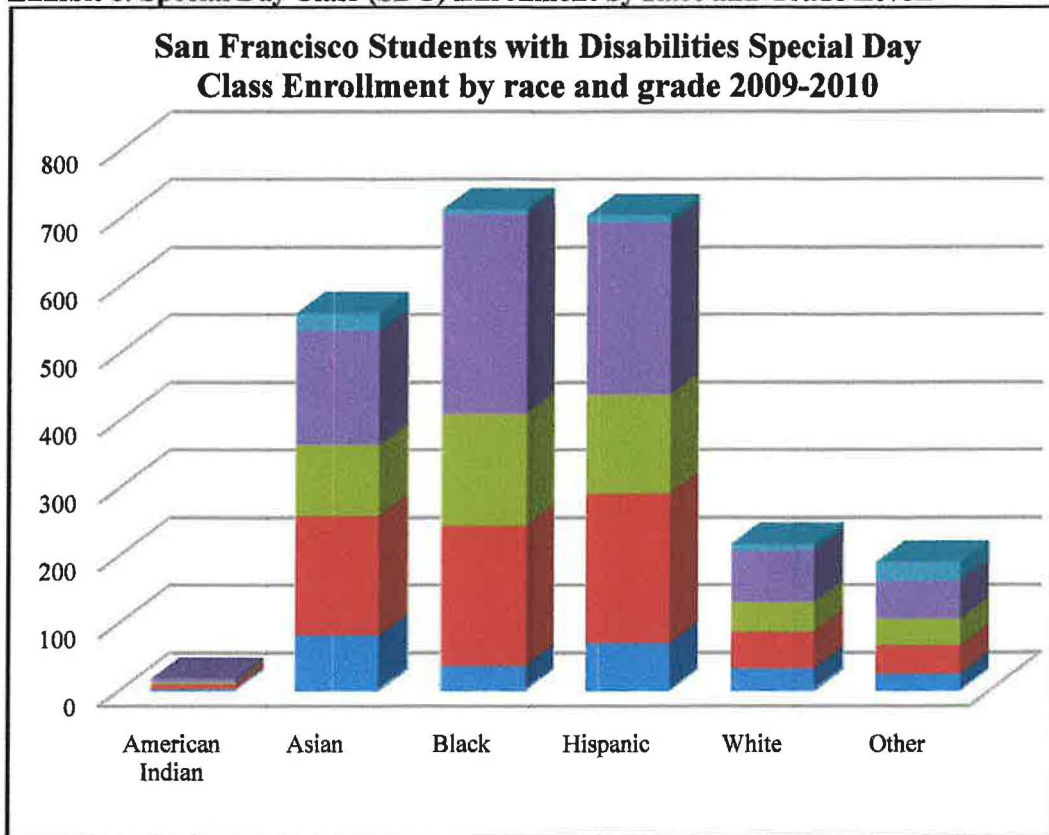
For the 2008–09 school year, SFUSD reported that only 16% of special education students (excluding Pre-K) were removed from regular classrooms for more than 60% of the day.¹⁸ However, the school district reports that 2,412 students are being served in special day classes (SDCs), a highly restrictive placement that minimizes access to the general education program and would indicate a removal from regular class settings for more than 60% of the day. This figure represents approximately 38% of the special education population of the district (including Pre-K). The discrepancy raises significant questions regarding the accuracy of the school district's LRE data and how they are collected. Staff and administrator concerns about data accuracy were discussed in a previous section, and the shortcomings of the data have limited the ability of the Core Team to conduct a thorough analysis of this important area.

The school district is reporting an additional 188 special education students as being served in private or nonpublic day or residential programs. Of the students in SDCs, 29% are African American and 29% are Hispanic. African American students make up 12% of the school district's student population and about 23% of the special education population. Hispanics make up 23% of the school district's student population and about 31% of the special education population (Exhibit 6).

Marilyn Friend & William D. Bursuck, *Including students with special needs: A practical guide for classroom teachers*, 5th edition (Needham Heights, MA: Allyn and Bacon, 2008).

¹⁸ California Department of Education: 2008–09 District-Level Special Education Annual Performance Report Measure for San Francisco Unified School District

Exhibit 6. Special Day Class (SDC) Enrollment by Race and Grade Levels



INCLUSION

According to the school district's webpage devoted to the topic of inclusion, in 1994 SFUSD began an inclusion program that initially provided inclusive education at two schools for four students, all of whom had severe disabilities.¹⁹ The program has grown since that time and has expanded beyond students with severe disabilities. A statement on the webpage explains that the inclusion program was intended "as a foundation on which to build a more inclusive District, which supports all of its students, those with disabilities and those without." The statement also acknowledges that "this will require fundamental changes in the ways that special and general education staff and administrators work together." In March 1999, then-superintendent Bill Rojas announced a "difficult and drastic" plan to move every special education child into mainstream classrooms within two years.²⁰ However, this did not come to pass; as stated in the previous section, the school district has not moved to the district wide implementation of inclusive practices and continues to provide special education using a program model

¹⁹ http://portal.sfusd.edu/template/?page=chief_academic_special_ed_inclusion

²⁰ <http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/1999/03/02/METRO11909.dtl>

instead of an integrated service delivery model. Generally speaking, in order for a child to be “included” at a given school in SFUSD, the school must have an inclusion program in place that consists of at least a designated inclusion teacher and paraprofessional support. Inclusion as a program is made available in schools to serve particular students (“inclusion students”) who are deemed able to receive instruction in general education classes. At the preschool level, there is only one program designated as inclusive, thus limiting opportunities for young children with disabilities to be served in integrated settings.

An integrated service approach requires every school to align educational services for students with disabilities within the existing structures (grade levels, academies, multi-age groupings, looping, etc.) rather than through special and pull-out programs. Professional staff are organized by the needs of each learner, and students are not clustered by label. In an integrated model of service delivery, staff are not assigned to a special education unit or program and placed in a separate classroom. Instead, special and general education teachers work in collaborative arrangements designed to bring appropriate instructional supports to each child in integrated one-to-one, small-group, and large-group instructional configurations. Students then receive proactive instructional support through a team of teachers with a range of expertise. Team problem-solving is conducted in accordance with the principles of a multitiered Response to Intervention (RtI) process that focuses on prevention of student failure through enhancement of teacher capacity. In this manner, students with and without disabilities—and their teachers—have the opportunity to learn and work with each other and to better understand each other’s strengths and gifts.²¹ (See Appendix E for an article that describes more fully the operation of an integrated model of service delivery.)

NONPUBLIC SCHOOL PLACEMENTS

SFUSD currently spends about \$14 million dollars annually on placements for students with disabilities in private residential and day schools. This figure does not include the transportation costs related to these placements. Students classified as emotionally disturbed make up 62% of SFUSD students in private day schools and nearly all (87.5%) of SFUSD students in residential programs (Exhibit 7). Fifty-seven percent (57%) of the students in nonpublic placements are African American (Exhibit 8). The vast majority of students in nonpublic schools (85.6%) are middle and high school students (Exhibit 9).

²¹ Colleen A. Capper & Elise M. Frattura, *Meeting the Needs of Students of All Abilities*

Exhibit 7. SFUSD Students in Nonpublic Schools by Disability

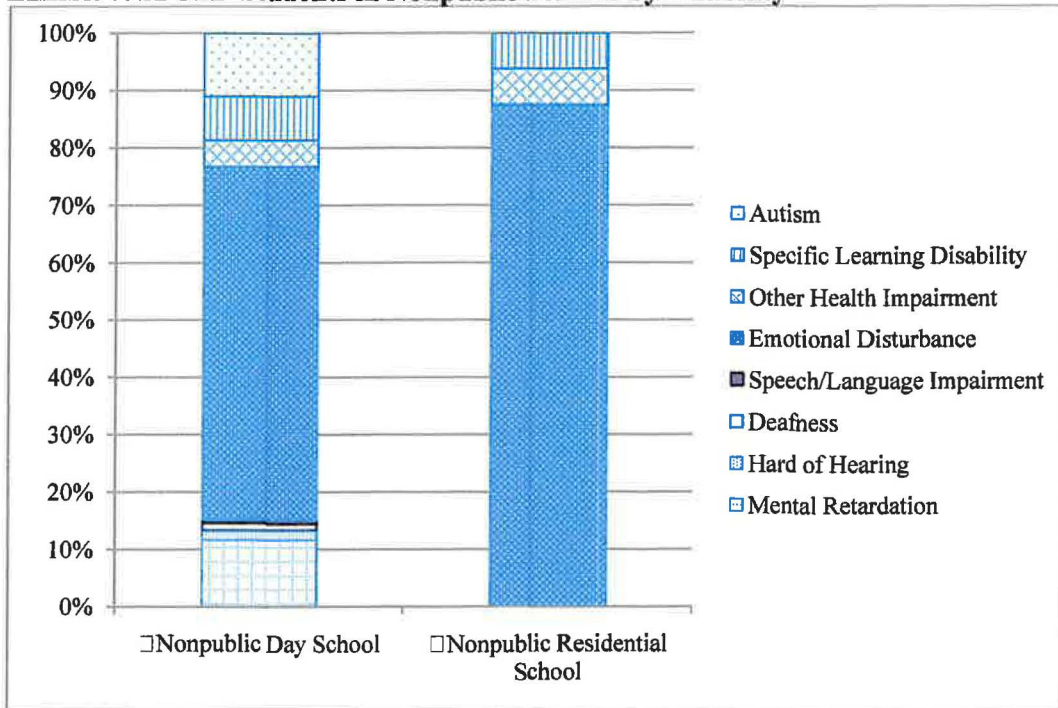


Exhibit 8. SFUSD Students in Nonpublic Schools by Race

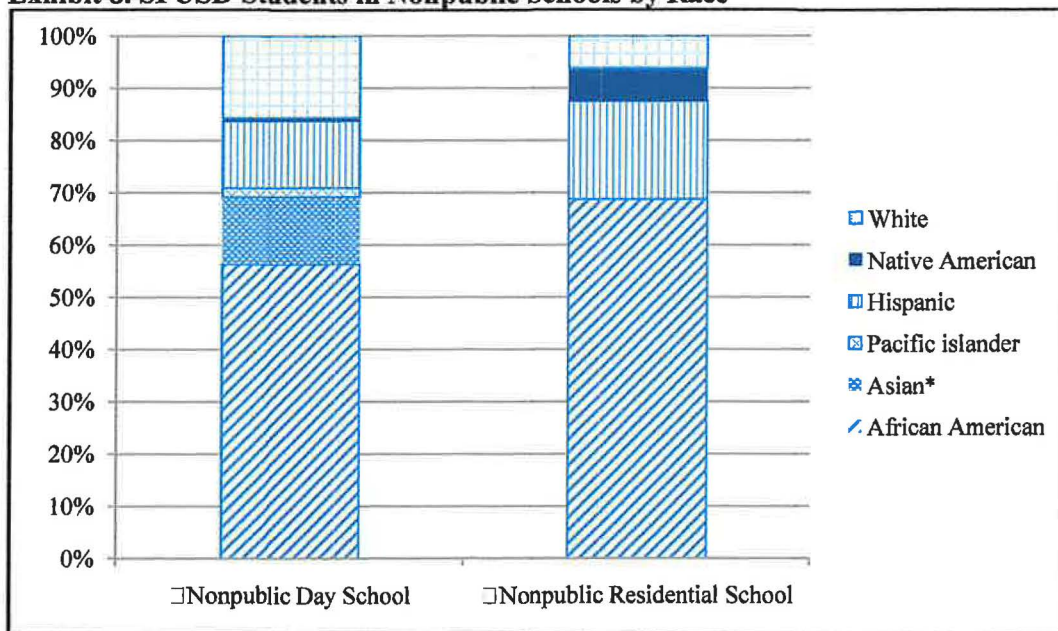
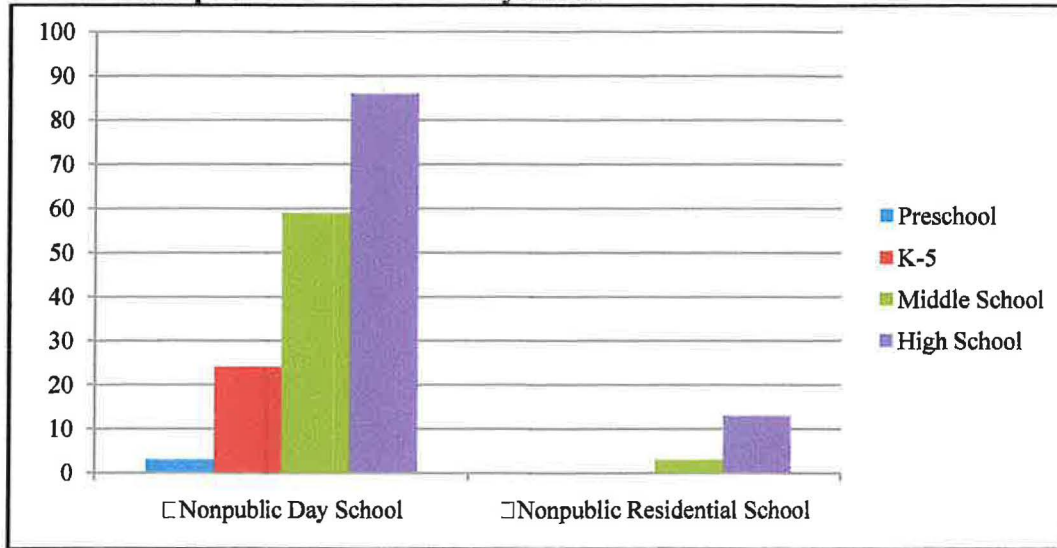


Exhibit 9: Nonpublic School Students by Level



B. Instruction and Instructional Practices

In reviewing the academic performance of students with disabilities in SFUSD, the Core Team found that this group has the smallest percentage of students at or above proficiency in both English language arts (ELA) and mathematics. As can be seen in the figures below, English language learners and low socioeconomic status (SES) students are closer to the general population than are students with disabilities. In 2009, the gap between students with disabilities and all other students ranged from 21 points for ELA in grades 2 through 5, to 43 points for math in grade 10 and the gaps widen as grade levels advance (Exhibits 10, 11, and 12).

Exhibit 10. Percentage of Students At or Above Proficiency in ELA (2007–2009)

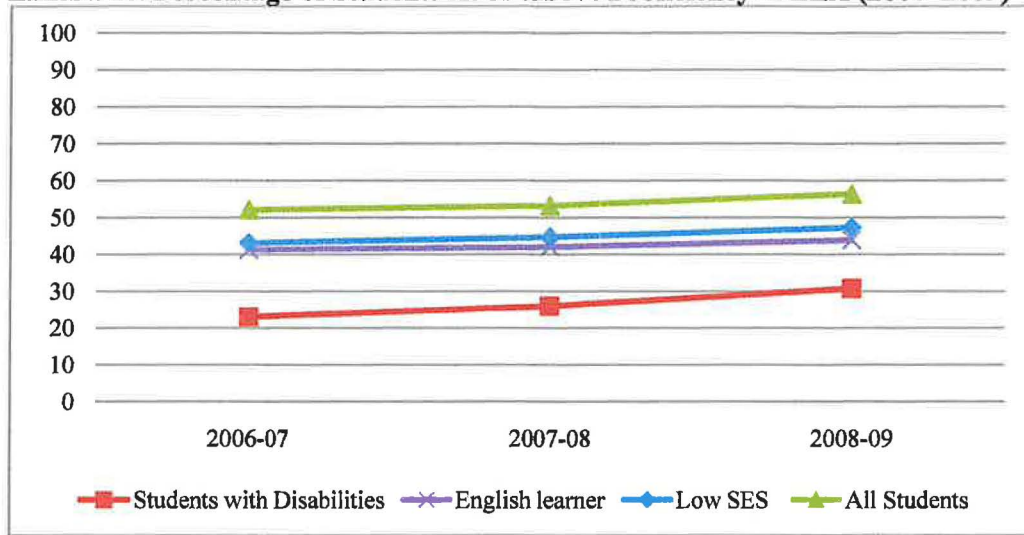


Exhibit 11. Percentage of Students At or Above Proficiency in Math (2007–2009)

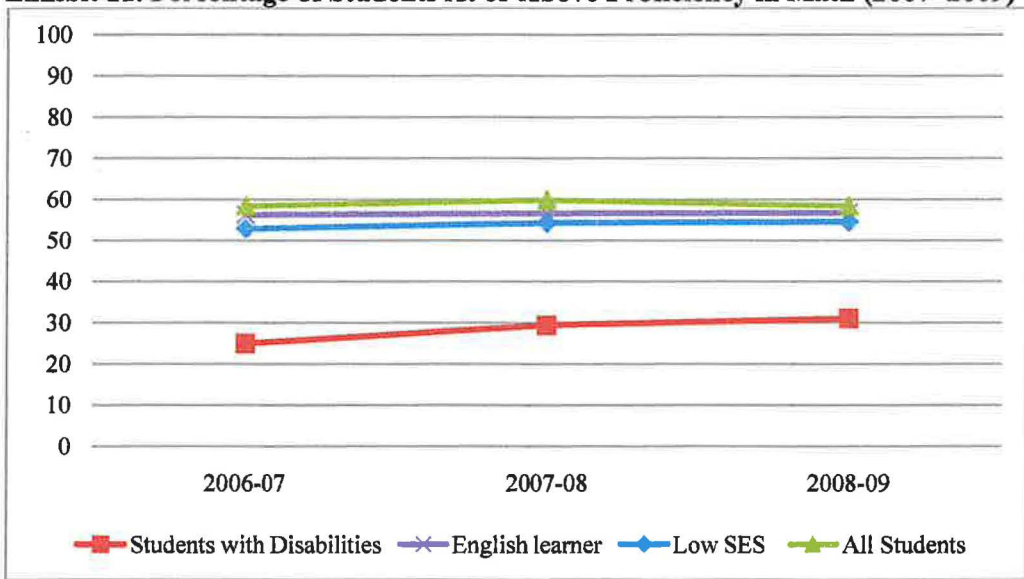
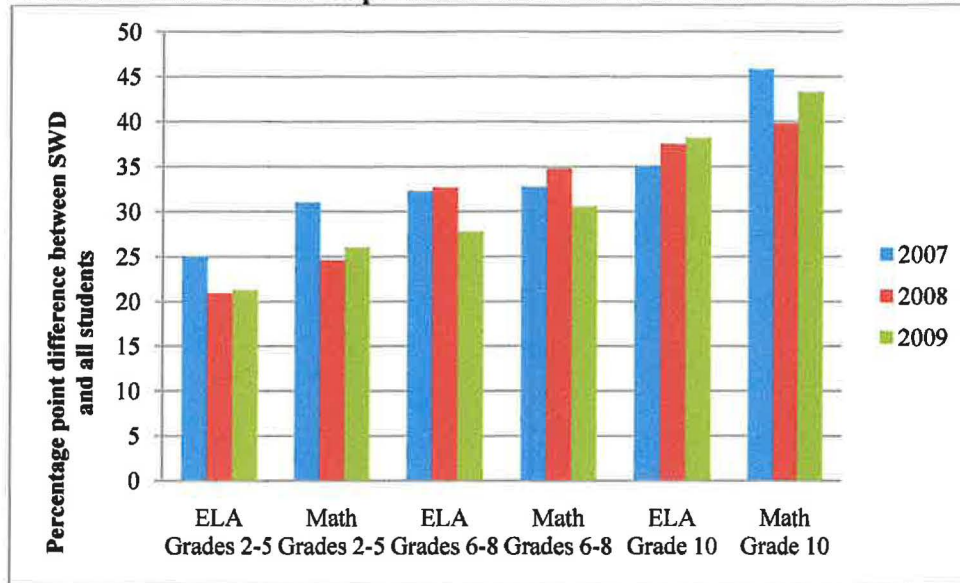


Exhibit 12. Performance Gap Between Students with Disabilities and All Students



ACCESS TO THE CURRICULUM

The achievement gap for students with disabilities must be addressed through an examination of the extent to which the school district's current delivery model provides quality access to the general education curriculum and in the context of the school district's vision for fostering the achievement of all its students as outlined in the strategic plan.

The Core Team noted, and administrators have acknowledged, that SFUSD lacks a systemwide core curriculum and content standards. As a result, the district lacks a consistent approach to performance monitoring, benchmark assessments, and professional development tied to strategic goals. The Core Team was heartened by the administration's commitment to change this situation and would recommend that it explore Richard DuFour's research and work in the area of Professional Learning Communities.²² The road to better outcomes for students with disabilities is the same as that for all children—high-quality instruction from knowledgeable teachers who:

- possess deep content knowledge
- understand how children develop and learn
- have a broad repertoire of instructional strategies

²² DuFour, R., DuFour, R., & Eaker, R. (2008). *Revisiting professional learning communities at work: New insights for improving schools*. Bloomington, IN: Solution Tree.

- embed formative assessment practices into every lesson
- use student data analysis as the basis for teacher collaborative team time

And within schools that:

- make effective instruction the topic of every conversation and the focus of every initiative,
- create a system that enables teachers to learn in community, and
- believe that such high quality instruction will produce better outcomes for all students.

As consistency in this area is established, it is critical that it be embedded in a model that provides multiple tiers of interventions and supports for all students. The Core Team strongly believes that, in order to successfully address the achievement gap and to accomplish the goals of the strategic plan, SFUSD needs to implement a systematic approach to prevention of student failure through the carefully targeted and appropriate use of research-based interventions along with consistent collection, analysis, and monitoring of student performance data.

RESPONSE TO INSTRUCTION AND INTERVENTION (RTI²): A MULTITIERED SYSTEM OF ACADEMIC AND BEHAVIORAL SUPPORTS

The California Department of Education has named its model for the provision of a multitiered system of supports Response to Instruction and Intervention (RtI²). The state superintendent of public instruction has written that this system “offers a way to eliminate the achievement gap through a schoolwide process that provides assistance to every student, both high-achieving and struggling learners. It is a process that utilizes all resources in a school and school district in a collaborative manner to create a single, well-integrated system of instruction and interventions informed by student outcome data.”²³ RtI² integrates resources from general education, categorical programs, and special education through a comprehensive system of core instruction and interventions to benefit every student. Its core components are:

1. *High-quality classroom instruction.* Students receive high-quality and culturally relevant, standards-based instruction in their classroom setting by highly qualified teachers.
2. *Research-based instruction.* The instruction that is provided within the classroom is culturally responsive and has been demonstrated to be effective through scientific research.
3. *Universal screening.* School staff assess all students to determine their needs. Using the collected data, school staff determine which students require close

²³ Letter from State Superintendent of Public Instruction Jack O’Connell, November 14, 2008.
<http://www.cde.ca.gov/nr/el/le/yr08ltr1114.asp>

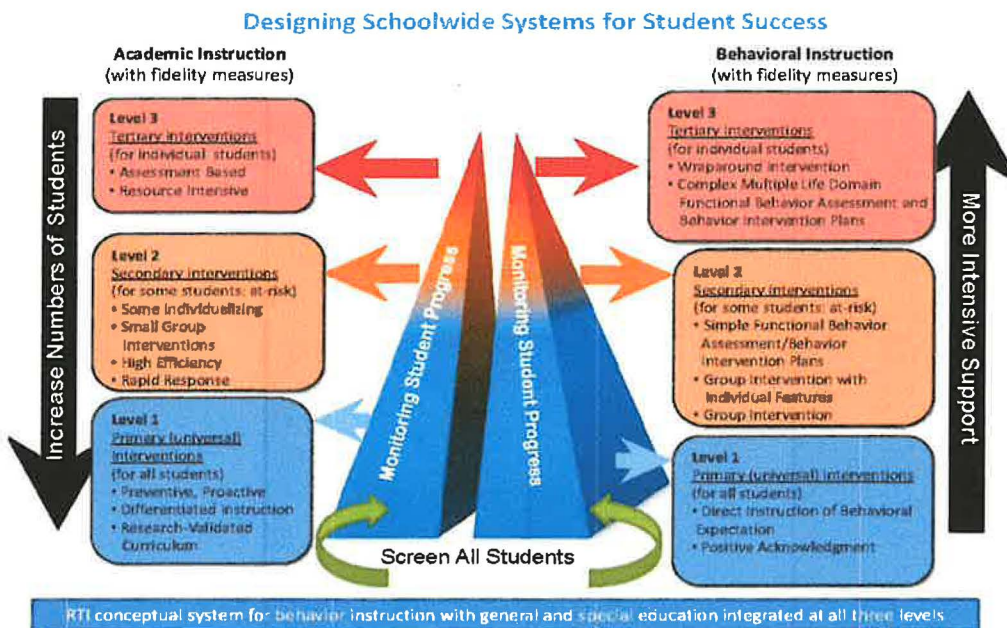
progress monitoring, differentiated instruction, additional targeted assessment, a specific research-based intervention, or acceleration.

4. *Continuous classroom progress monitoring.* The academic performance of all students is monitored continually within the classroom. In this way, teachers can identify learners who need more depth and complexity in daily work as well as those who are not meeting benchmarks or other expected standards, and adjust instruction accordingly.
5. *Research-based interventions.* When data indicate a lack of progress, an appropriate research-based intervention is implemented. The interventions are designed to increase the intensity of the students' instructional experience.
6. *Progress monitoring during instruction and interventions.* School staff use progress-monitoring data to determine the effectiveness of the acceleration or intervention and to make any modifications as needed. Carefully defined data are collected on a frequent basis to provide a cumulative record of each student's response to instruction and intervention.
7. *Fidelity of program implementation.* Student success in the RtI² model requires fidelity of implementation in the delivery of content and instructional strategies specific to the learning and/or behavioral needs of the student.
8. *Staff development and collaboration.* All school staff are trained in assessments, data analysis, programs, and research-based instructional practices and strategies. Site, grade-level, or interdisciplinary teams use a collaborative approach to analyze student data and work together in the development, implementation, and monitoring of the intervention process.
9. *Parent involvement.* The active participation of parents at all stages of the instructional and intervention process is essential to improving the educational outcomes of students. Parents are kept informed of the progress of their children in their native language or other mode of communication, and their input is valued in making appropriate decisions.
10. *Specific learning disability determination.* The RtI² approach may be one component of specific learning disability determination as addressed in the IDEA 2004 statute and regulations. As part of determining eligibility, the data from the RtI² process may be used to ensure that a student has received research-based instruction and interventions.

It is important that a system of supports be designed to address students' social and behavioral needs as well as academic ones. This is best accomplished when behavioral instruction (i.e., a schoolwide system of positive behavioral supports) is integrated into the RtI model (Exhibit 13). Therefore, we will use the term multitiered system of academic and behavioral supports in our discussion in order to represent this broader and more integrated approach that provides "a coherent continuum of evidence-based, systemwide practices to support a rapid response to academic and behavioral needs" and includes "frequent data-based monitoring for instructional decision-making."²⁴

²⁴ *Kansas Multi-Tier System of Supports: Structuring Guides* (2010). Available at <http://www.kansasmtss.org/resources.htm>

Exhibit 13. Conceptual System for RtI with Academic and Behavioral Instruction²⁵



(See Appendix D for a full-page representation of the above graphic.)

Although SFUSD has held some professional development sessions on RtI for student support teams and efforts have been made at the school level to implement RtI principles in a problem-solving context, the district lacks a systematic and systemwide approach to implementation of a multitiered system. Such an endeavor would require a shared conviction that this is a critical initiative benefiting all children and is owned by the entire instructional leadership of the school district. Staff and administrators responsible for curriculum and instruction will need to direct planning for implementation, as the school district puts into place expectations for the core curriculum, content standards, and procedures for progress monitoring. *Response to Intervention: Blueprints for Implementation, District Level Edition*, published by the National Association of State Directors of Special Education, provides a helpful framework for school district leadership to use in implementing a multitiered system.²⁶

²⁵ Wayne Sailor, *Making RTI Work: How Smart Schools Are Reforming Education Through Schoolwide Response-to-Intervention* (San Francisco: Jossey Bass, 2009).

²⁶ *Response to Intervention: Blueprints for Implementation, District Level Edition* (2008). Available at <http://nasdse.org/Projects/ResponsetoInterventionRtIProject/tabid/411/Default.aspx>

RECOMMENDATIONS

SFUSD must shift from its current programmatic orientation to service delivery to an integrated approach. This foundational recommendation involves much more than simply changing the way the Special Education Services department operates. It involves a significant shift in how the school district operates as a whole in addressing the needs of diverse learners. To accomplish this change will require a significant redirection in organizational orientation (see Section I), role redefinitions at the central office and in schools, the development of revised identification and placement procedures based on the adoption and implementation of multitiered academic and behavioral interventions and supports (i.e., a braided model of Response to Intervention and positive behavioral supports), and a significant amount of professional development. The move will require time and a well-developed and articulated agenda that is incorporated into the school district's strategic planning process. Necessary steps include:

- Board-level commitment. The superintendent should seek approval or endorsement from the school board for the establishment of an integrated service delivery model in the school district.
- A moratorium should be called on the establishment of additional segregated programs and the movement of students who are deemed not to fit into existing programs to other schools and settings. Instead, a problem-solving model using the existing SSTs needs to be established to determine what services and supports are required for the success of both students and school staff.
- SFUSD must move to a philosophy that all students with disabilities should attend the schools they would attend if not disabled.
 - The current change in student assignment procedures (March 2010) is the first step toward equity and access for students with disabilities. Supported through professional development and onsite expertise, both special and general educators' confidence, knowledge, and skills will increase as students with disabilities begin to attend their neighborhood schools or schools of choice, regardless of disability. Such changes should result in less time for a child to travel to and from school as well as a decrease in the cost of transportation.
 - Students with disabilities must have access to rooms and facilities within each school that are commensurate with those of their nondisabled peers when they require small-group or one-on-one instructional time.
 - Each child with a disability should be placed in the age-appropriate classroom he or she would attend if not disabled. The percentage of time each child spends in large-group, small-group and one-on-one instruction is defined by his or her IEP goals.

- Staffing for a cross-categorical model in which special educators are aligned by grade level or academies to better allow for proactive integrated support as an equal member of a grade-level team or department serving students with a range of disabilities (e.g., those eligible for specific learning disability, emotional disability, autism, other health impairment, or cognitive disability at a parallel percentage rate to the district norms):
 - Elementary School: 10 students with a range of disabilities with one special educator and one assistant.
 - Middle School: 12 students with a range of disabilities with one special educator and one assistant.
 - High School: 14 students with a range of disabilities with one special educator and one assistant (high school for students age 18-22 who continue to require education in the area of functional skills and community development would fall under a higher ratio of teachers to students for the purposes of ongoing instruction in work, recreation, domestic, and community skills.
 - The transformation of SFUSD's special education service delivery model may have grandfathering provisions as well as exemptions based on the age and disability of the student.
 - Students with disabilities should be integrated within the natural proportions of the prevalence of their disability versus clustered into groups of students with like disabilities in specific schools and classrooms.
 - The establishment of inclusive early childhood programs throughout the school district.
-
- All special education teachers and support staff must be included in the school district's professional development plans and initiatives, as well as participate in those professional development requirements delineated in Section III of this report.
 - The Core Team believes that the establishment and implementation of core curriculum and content standards with fidelity of implementation in the delivery of content and instructional strategies within a multitiered system of supports will positively impact outcomes for students with disabilities, provide the foundation for an integrated services approach to educating students with disabilities, and effectively address the issue of disproportionate representation in special education.

Section III: Professional Development

“Creating and sustaining professional learning communities is essential to the pursuit of equity in our classrooms, our schools, and our district.”

(Beyond the Talk: Taking Action to Educate Every Child Now. SFUSD 2008–2012 Strategic Plan.)

POSITIVE FINDINGS

Teachers are desperately seeking a vision for service delivery supported by cohesive professional development opportunities.

Parents support a plan to allow for more equitable services for all students with disabilities.

Special education teachers and related services personnel are looking forward to becoming equal members of educational teams with their general education colleagues to collaboratively support students with disabilities under a unified vision of equity and social justice.

CONCERNS

Many members of our focus groups expressed concern about the school district’s inconsistent messages regarding the education of students with disabilities. The main challenge was the lack of sufficient opportunities for all educators to participate in relevant professional development opportunities that address the many needs of students with disabilities and other diverse learners.

Effective professional development should focus on two key areas: policies and procedures, and curriculum and instruction.

Policies and Procedures

In conversations with the various focus groups, the Core Team found:

- a lack of knowledge about regulations governing the education of students with disabilities
- inconsistent responses from central office representatives regarding special education programs, procedures, and processes
- a lack of local policy documents and guidelines (i.e., a procedural manual)

- a lack of understanding of parental rights and procedural safeguards among professionals and parents
- a need for an articulated shared vision and training that empowers educators to work together on behalf of all students

Once the school district has taken steps to resolve the organizational infrastructure issues identified in Section I, it is imperative that professional development be provided to school site personnel that will allow for the accountability necessary to improve outcomes for students with disabilities. Many school site personnel, due to the absence of clear policies and procedures as well as the lack of stable leadership in the Special Education Services department, stated that they must “figure it out” on their own much of the time.

Curriculum and Instruction

School district leaders are taking steps to establish a common core curriculum and the consistent use of benchmark assessments across the district. In addition, the leadership should identify and establish research-based academic and behavioral interventions to meet the needs of students, with or without disabilities, who have fallen behind or are at risk of falling behind academically. This cultural shift will require considerable professional development for teachers and other professionals at the school level. Teachers of students with disabilities must have the same opportunities as all other teacher groups for professional development that addresses the improvement of student achievement. Collective competency determines the level of instruction that all students receive. When all teachers believe that they have the capacity to improve student outcomes and work collaboratively with that focus in mind, all students succeed. Through both content and method of delivery, those administering professional development programs should take the opportunity to emphasize the inclusion of students with disabilities in the general education program.

It is critical that those at the central office with expertise in differentiating instruction for students with special needs (including English language learners) be engaged in the planning for this significant change. Thus, the Special Education Services department must be thought of as a vital participant in all conversations related to curriculum and instruction in SFUSD. This participation must be embedded in all decision-making processes as a keystone, not as an afterthought.

RECOMMENDATIONS

Policies and Procedures

- Develop a district special education procedural manual with the participation of key staff members and representatives of the advocacy community.

- Identify sections of the procedural manual that need to be reinforced and develop one-page “reminders” that can be distributed in the form of monthly flyers and/or accessed on a webpage specific to this purpose.
- Utilize school-based data to determine areas of noncompliance and develop individualized school support teams to address needs.
- Train central office clerical staff on key aspects of the regulations in order to help them determine where and from whom to obtain accurate responses to inquiries. Keep a log of the concerns and the timeliness of the responses.
- Customize school-level training based on the school’s ability to build capacity to serve all students through the use of building-based service delivery teams.

Curriculum and Instruction

- Provide teachers of students with disabilities with the same professional development opportunities that address the improvement of student achievement as all other teacher groups. To accomplish this the following should be considered:
 - Examine all federal funding sources, Title I, Title II (last year for funding) Title III, IDEA, and any other grant possibilities in order to implement a comprehensive professional development plan. Redesign the use of funds to provide the necessary incentives for educators to participate.
 - Determine needs based on student achievement data and focus on areas in need of improvement.
 - Convene teams of the “best and brightest” from various certifications to receive core subject-area training and pedagogical development. Utilize the teams as trainers-of-trainers to deliver professional development before and after school based on need.
 - Coordinate all core subject-area training with district divisions responsible for teacher performance.
 - Conduct comprehensive training on the implementation of the Response to Intervention (RTI) model.

SUMMARY OF RECOMMENDATIONS

The Team acknowledges that the recommendations presented in this report are far reaching and will require a cultural shift in the school district's policies and practices, and in its standards of accountability. This will take time. That being said, the Team concurs with those parents and education professionals in San Francisco — including the school district's leadership — that there needs to be a sense of urgent deliberateness in making changes in the way that students with disabilities are valued and educated. With a shared vision and dedicated leadership to ensure that these students benefit from the school district's strategic goals in the same way that other students will, the Core Team believes strongly that the purpose of this review — to improve outcomes for students with disabilities — can and will be accomplished. The following is a by-section listing of the Core Team's recommendations.

INFRASTRUCTURE

Organizational Orientation

- The leadership of SFUSD must clearly and unequivocally articulate a unified vision for the school district relative to students with disabilities, consistent with its strategic plan, that (1) establishes the goal of building capacity at each and every school to meet the needs of each and every student using an integrated comprehensive, and inclusive model of service delivery; (2) provides students with disabilities and their families the opportunity to receive the same school attendance choices as all other students; and (3) reflects the same high expectations as those set forth for all students.
- School principals must understand that they are responsible and accountable for all students in their schools, including those receiving special education services. This accountability must be backed up with a districtwide data-driven accountability system that focuses on the success all students, including students with disabilities.
- Efforts to expand and improve communication with individual parents and the advocacy community should continue, along with consideration of the role of the Community Advisory Committee for Special Education.
- The school district must conduct an in-depth analysis of its disproportionality percentages, and, in particular, why students of color are at significantly greater risk than other student to be identified as having selected disabilities.

Organizational Structure

- An immediate interim reorganization of the Special Education Services department should be set in motion. It needs to be made clear that, in light of the anticipated reorganization of the school district and, specifically, the Instruction, Innovation, and Social Justice department, this interim structure will be revisited and revised again in 2011. The critical aspects of this interim reorganization are:
 - The creation of a single entity, under the direction of one supervisor, focused on compliance issues and activities. The primary purpose of this unit will be to support principals and school-based staff in maintaining compliance with federal and state mandates, and to provide clear written procedures and the professional development required to hold schools accountable for timely and accurate student records and data input. Assigned staff, as a team, will also be responsible for the monitoring and reviewing of districtwide compliance data and will assist schools in monitoring data. This team should provide monthly reports that include specific recommendations for meeting compliance standards to the LEAD administrators.
 - The elimination of the position of content specialist and its replacement with the position of instructional support specialist. These positions, under the direction of the assistant superintendent, are to lead a districtwide service-delivery team to assist in the transformation of the service delivery model. Instructional support specialists promote equitable access to all educational opportunities and ensure the participation of students with disabilities in grade-level, general education curriculum as well as extracurricular activities. Once the school district's overall reorganization is in place, the activities of these individuals should be aligned to the work of the LEAD department and other district-level staff supporting curriculum and instruction for all students with an emphasis on customizing instructional supports for schools in a comprehensive and cross-categorical manner by grade level.
 - The provision of cross-categorical proactive support to schools using general and special education specialists through the school district's new regionalized support structure.

Student Assignment Practices

- The establishment of service attendance area boundaries for special education programs contained in the school district's new student assignment policy must be viewed as a temporary measure as the district moves to an integrated service model for students with disabilities (see Section III). Board policy should be revised to eliminate this provision as soon as possible but no later than 2013.

Data and Data-Based Decision-Making

- An immediate review of the school district's special education student information management system should be conducted to assess its functionality, accuracy, and efficiency. Input is needed from users at the school and central office levels to determine how to improve:
 - accuracy of data input and reporting
 - the user interface in order to minimize errors, omissions, and confusion, including the elimination of unnecessary data fields that are not state or federal reporting requirements and do not provide essential information for monitoring special education programs and services
 - the user interface in order to simplify the IEP development process for parents and professionals
 - access to data at the central office and school level in order to support quality improvement, compliance monitoring and placement decisions
 - the professional development training and materials required to ensure accurate, timely, and consistent data input

- After input is received from the users, the assistant superintendent, in consultation with the Information Technology department, should convene a meeting with the vendor to discuss necessary changes. Once confidence in the accuracy of the data has been restored, administrators must plan for how these data are to be used to improve accountability at all levels.

Funding and Budget

- The assistant superintendent for Special Education Services should be responsible for budget development and management of the IDEA grant and the expenditure of funds. The assistant superintendent, with input from key stakeholders, should be responsible and accountable for annually reviewing the grant budgets and making allocations based on the needs of SFUSD students with disabilities. This authority allows the leadership of special education programs and services to review the budget with an eye toward eliminating items that have no proven results for students and adding or enhancing line items that do have specific purposes. This increased autonomy connects resources to responsibility for results. Budget Services can promote this active engagement by assisting program staff with the online template, but program decisions should be left to the Special Education Services department. After drafting the grant budget, Budget Services would then be given the budget for careful review and detailed adjustments for submission to the funding agency.

- The Special Education Services department, in consultation with the Budget Services office as appropriate, should:
 - Evaluate the effectiveness of expenditures on student achievement in the local plan on an annual basis
 - Eliminate expenditures that show minimal results
 - Remove and re-budget items in special education grants that are not supplemental
 - Hold program staff accountable for funding decisions

- The Budget Services office, in consultation with the Special Education Services department, should:
 - Provide program staff assistance with the budget template for calculation purposes
 - Decentralize budget development to allow program staff to fully manage and develop the local plan budget each year to fund programs that supplement school district programs for the achievement of students with disabilities.
 - Allow for amendments based on student needs as they arise throughout the year.
 - Update budget narrative information on the school district's website in a way that ties the budget to student outcomes to ensure transparency.
 - Revisit the current budgeting model, including the weighted student formula, to support an integrated service delivery model (see Section II).

SERVICE DELIVERY AND INSTRUCTIONAL PRACTICES

Service Delivery

SFUSD must shift from its current programmatic orientation to service delivery to an integrated approach. This foundational recommendation involves much more than simply changing the way the Special Education Services department operates. It involves a significant shift in how the school district operates as a whole in addressing the needs of diverse learners. To accomplish this change will require a significant redirection in organizational orientation (see Section I), role redefinitions at the central office and in schools, the development of revised identification and placement procedures based on the adoption and implementation of multitiered academic and behavioral interventions and supports (i.e., a braided model of Response to Intervention and positive behavioral supports), and a significant amount of professional development. The move will require time and a well-developed and articulated agenda that is incorporated into the school district's strategic planning process. Necessary steps include:

- Board-level commitment. The superintendent should seek approval or endorsement from the school board for the establishment of an integrated service delivery model in the school district.

- A moratorium should be called on the establishment of additional segregated programs and the movement of students who are deemed not to fit into existing programs to other schools and settings. Instead, a problem-solving model using the existing SSTs needs to be established to determine what services and supports are required for the success of both students and school staff.
- SFUSD must move to a philosophy that all students with disabilities should attend the schools they would attend if not disabled.
 - The current change in student assignment procedures (March 2010) is the first step toward equity and access for students with disabilities. Supported through professional development and onsite expertise, both special and general educators' confidence, knowledge, and skills will increase as students with disabilities begin to attend their neighborhood schools or schools of choice, regardless of disability. Such changes should result in less time for a child to travel to and from school as well as a decrease in the cost of transportation.
 - Students with disabilities must have access to rooms and facilities within each school that are commensurate with those of their nondisabled peers when they require small-group or one-on-one instructional time.
 - Each child with a disability should be placed in the age-appropriate classroom he or she would attend if not disabled. The percentage of time each child spends in large-group, small-group and one-on-one instruction is defined by his or her IEP goals.
 - Staffing for a cross-categorical model in which special educators are aligned by grade level or academies to better allow for proactive integrated support as an equal member of a grade-level team or department serving students with a range of disabilities (e.g., those eligible for specific learning disability, emotional disability, autism, other health impairment, or cognitive disability at a parallel percentage rate to the district norms):
 - Elementary School: 10 students with a range of disabilities with one special educator and one assistant.
 - Middle School: 12 students with a range of disabilities with one special educator and one assistant.
 - High School: 14 students with a range of disabilities with one special educator and one assistant (high school for students age 18-22 who continue to require education in the area of functional skills and community development would fall under a higher ratio of teachers to students for

the purposes of ongoing instruction in work, recreation, domestic, and community skills.

- The transformation of SFUSD's special education service delivery model may have grandfathering provisions as well as exemptions based on the age and disability of the student.
 - Students with disabilities should be integrated within the natural proportions of the prevalence of their disability versus clustered into groups of students with like disabilities in specific schools and classrooms.
 - The establishment of inclusive early childhood programs throughout the school district.
- All special education teachers and support staff must be included in the school district's professional development plans and initiatives, as well as participate in those professional development requirements delineated in Section III of this report.

Instruction and Instructional Practices

- The Core Team believes that the establishment and implementation of core curriculum and content standards with fidelity of implementation in the delivery of content and instructional strategies within a multitiered system of supports will positively impact outcomes for students with disabilities, provide the foundation for an integrated services approach to educating students with disabilities, and effectively address the issue of disproportionate representation in special education.

PROFESSIONAL DEVELOPMENT

Policies and Procedures

- Develop a district special education procedural manual with the participation of key staff members and representatives of the advocacy community.
- Identify sections of the procedural manual that need to be reinforced and develop one-page "reminders" that can be distributed in the form of monthly flyers and/or accessed on a webpage specific to this purpose.
- Utilize school-based data to determine areas of noncompliance and develop individualized school support teams to address needs.
- Train central office clerical staff on key aspects of the regulations in order to help them determine where and from whom to obtain accurate responses to inquiries. Keep a log of the concerns and the timeliness of the responses.

- Customize school-level training based on the school's ability to build capacity to serve all students through the use of building-based service delivery teams.

Curriculum and Instruction

- Provide teachers of students with disabilities with the same professional development opportunities that address the improvement of student achievement as all other teacher groups. To accomplish this the following should be considered:
 - Examine all federal funding sources, Title I, Title II (last year for funding) Title III, IDEA, and any other grant possibilities in order to implement a comprehensive professional development plan. Redesign the use of funds to provide the necessary incentives for educators to participate.
 - Determine needs based on student achievement data and focus on areas in need of improvement.
 - Convene teams of the "best and brightest" from various certifications to receive core subject-area training and pedagogical development. Utilize the teams as trainers-of-trainers to deliver professional development before and after school based on need.
 - Coordinate all core subject-area training with district divisions responsible for teacher performance.
 - Conduct comprehensive training on the implementation of the Response to Intervention (RTI) model.

Appendix A: Partial List of Individuals Interviewed

Partial List of Individuals Interviewed

- Superintendent
- Deputy Superintendent
- Deputy for Operations
- Transportation Administrator
- Chief of Staff
- Charter School Administrator
- Chief Financial Officer
- Chief Human Resource Officer
- Chief Strategy Officer
- Chief Information Officer
- Attorney handling Due Process
- Assistant Superintendent: Academics & Professional Development
- Executive Director of Special Education Services
- Elementary Supervisor
- Secondary Supervisor
- Professional Development Program Administrator
- DIS Supervisor
- DIS Team
- Content Specialists & ED, Learning Support Professionals
- K-12 Site Support
- Learning Support Professionals
- Child Development Center Leadership
- Principals (7-8 in each group): Elementary, Middle, Senior
- General Education Teachers (7-8 in each group): EC/PK, Elementary, Middle, Senior
- Special Education Teachers (7-8 in each group): EC/PK, Elementary, Middle, Senior
- Related Services Providers: Speech, OT/PT, Nursing, Psychologists, Social Workers, Guidance
- Autism and EBD Program leadership
- Parents/Advocates
- Board Members
- Bargaining Unit Leaders
- Inclusion Task Force

Appendix B: List of School Sites Visited

List of School Sites Visited

- Mission High School
- Presidio Child Development Center
- Sanchez Elementary School
- West Portal Elementary School
- New Traditions Elementary School
- Visitacion Valley Middle Schools
- E.R. Taylor Elementary School
- Lincoln High School
- Francis Scott Key Elementary School

Appendix C: List of Documents Reviewed

List of Documents Reviewed

- Report: December 1
- Current Organizational Chart of San Francisco Unified School District
- Current Organizational Chart of San Francisco Unified School District
Special Education Department
- San Francisco Unified School District Staffing Data
- Special Education Services and Program Descriptions 2009-2010
- Description and List: Recent Initiatives in Special Education
- Current Policies and Procedures Manual
- Code of Conduct
- Current Discipline Data
- Current IDEA Performance Indicator Reporting Data
- San Francisco Unified School District Student Demographics 2004-2009
- Current Student Achievement Data
- Post-Secondary Outcomes Data
- Internal and External Reports
- San Francisco Unified School District Data-Students Identified with
Emotional/Behavioral Disabilities
- San Francisco Unified School District Data-Students Identified with Autism
- Referral and Eligibility Data: Pre-K-Grade Twelve 2008-2009
- San Francisco Unified School District Placement Data
- Completed Referral Samples: Secondary Packet
- Completed Referral Samples: Elementary Packet
- Completed Referral Samples: Pre-School/Kindergarten Packet
- Special Education Exiting Data
- Due Process Complaints
- Student Attendance Data
- Special Education Provider Attendance Data
- Professional Development Activities Calendar 2008-2009
- Collective Bargaining Agreement
- Program Review Summary Special Education Cost Analysis Report 2010
- Special Education Annual Data Comparison Report
- District Annual Financial Report June 2009
- Academics and Professional Development Department Balanced Scorecard
- Balanced Scorecard Student Services
- Response to Instruction (RTI) Planning
- District Annual Performance Report (APR) for FY 2007

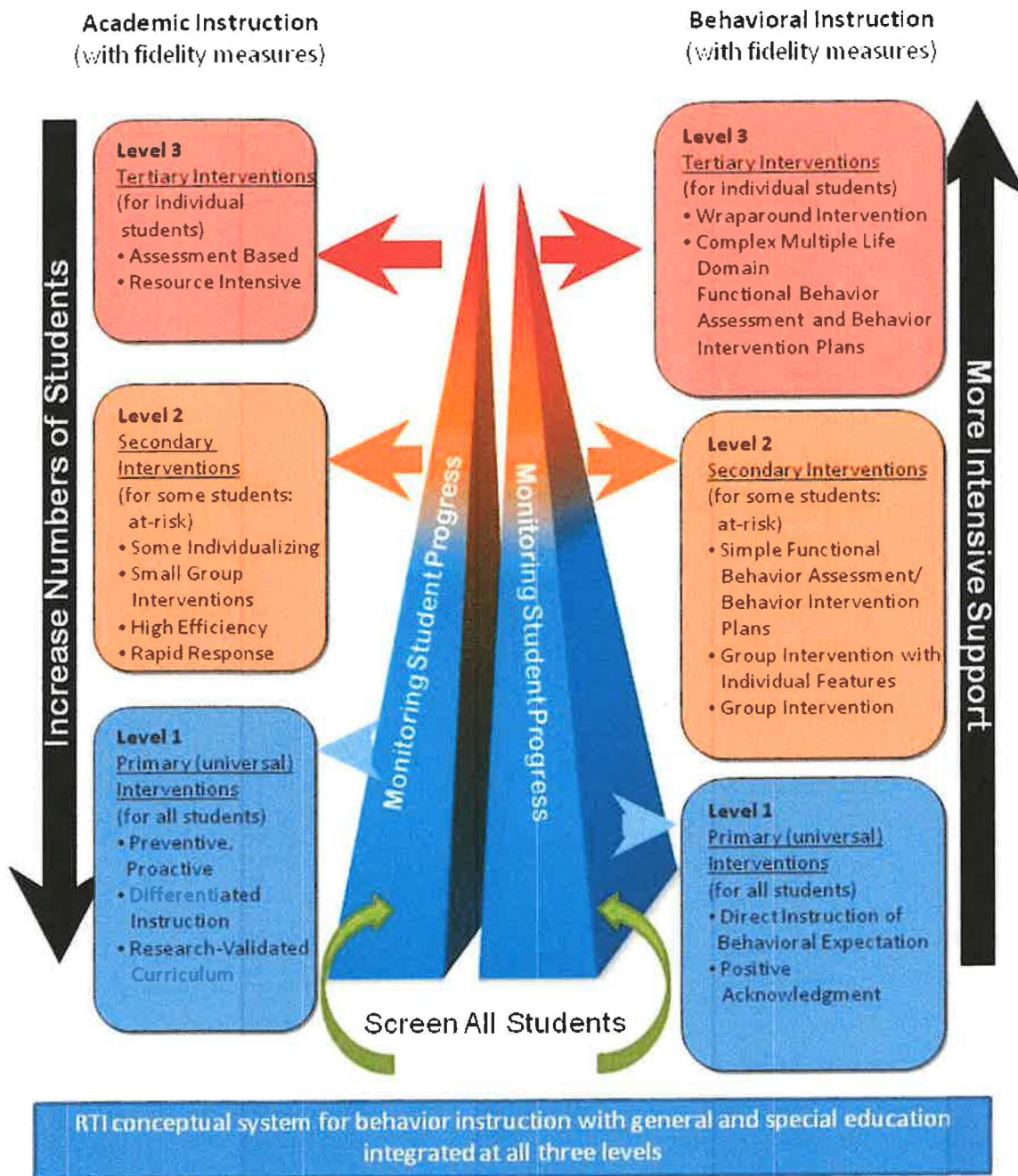
- Determining Learning Disability Eligibility using Response to Intervention (RTI)
- Concerns Regarding Special Education
- Data on Emotional/Behavior Disabilities Program
- Kaplan, Robert S. and Norton, David P. (1996) "Using the Balance Scorecard as a Strategic Management System." *Harvard Business Review*
- Inclusion Prerequisites
- Interim Redesign of Special Education Services
- Lau Action Plan September 2008
- Parent Guide to Choosing a School
- Draft Report: Establishing an Inclusive Education System in the San Francisco Unified School District
- Recommendations for Community Access Training (CAT) Classes
- Recommendations for Improving Special Education Services within the San Francisco Unified School District
- Responses to Questions Regarding the Special Education Redesign Project
- Data on Ethnic Counts by Grade Level 2001-2010
- Proposal on K-3 Response to Intervention (RTI)
- Special Education Annual Performance Report Measure 2008-2009
- Data on Schools
- Data on Special Day Care (SDC) Ethnic Counts by Grade 2009-2010
- Report on Special Education Teacher Professional Development Pilot Program 2010
- San Francisco Unified School District Proposal
- District Facts at a Glance
- District Enrollment Data Grades K-12
- District Strategic Plan 2008-2012
- District Union Contract 2007-2010
- Comments by Special Education Teachers within the San Francisco Unified School District
- Summary of Recommendations for Improving Special Education Services
- Plan for Instructional Technology Executive Summary 2009-2012
- Data and Preliminary Document on Autism Program
- Board of Education Minority Report
- Community Advisory Committee (CAC) Report 2009
- Support of Families Newsletter 2008, 2009
- Community Advisory Committee (CAC) District Strategic Plan
- Inclusion, Resource Specialist Program (RSP), Special Day Care (SDC) Capacity Report

- District Special Education Division Review
- Description of Legal Requirements to Determine Placement of Students with Disabilities
- Example of Resource Specialist Program (RSP) Services
- District Data on Schools and Disabilities
- District Data on Choice Assignments
- Certification Page for Submission of the Corrective Action Statement
- Self-Review Cover Letter
- District Corrective Action Plan
- Description of Correction Action Form Explanation and Instructions
- Description of Challenges Confronting Pre-K Special Education Staff
- Professional Development Plan for Pre-K
- Meeting Notes for Pre-K Planning
- Description of Preschool Special Education Services
- Data on District Diversity and Inclusion
- Handbook on Inclusive Services Herbert and Hoover Middle School
- Data Collection Form for Inclusive Programs
- Remarks to District Board of Education Regarding Inclusive Schools Week
- San Francisco Inclusion Task Force Meeting 2008, 2009
- District Web Archives
- District Special Education Enrollment Guide
- Distribution of San Francisco Unified School District Inclusion
- New Proposed Organizational Structure for the District
- Para Contract: United Support Personnel 2007-2010
- Para Contract: Paraprofessional Substitute Corps
- Teacher Contract 2007-2010
- San Francisco Special Education Local Plan Area 2007
- Board Presentation on Student Assignment
- Data for Student Assignment Redesign Planning
- Press Release for Student Assignment Redesign
- Student Assignment Board of Education Policy
- Superintendent's Plan for Redesigning Student Assignment
- Description of Referral Assessment Process
- Meeting Agenda for Deaf/Hard of Hearing 2010
- Age Appropriate Transition Assessment
- Description of Cochlear Implants
- Progress Report March 2010

- Report on Intervention Strategies for Students with Language Learning Disabilities
- Special Education Teacher Professional Development (SETPD) Summary 2009-2010
- Special Day Class (SDC) Teacher's Guide
- Description of Writing the Transition IEP
- District Professional Development Day 2010
- Data on Adequate Yearly Progress (AYP) 2007, 2008, 2009
- Layout of Adequate Yearly Progress (AYP) 2007, 2008
- Guide for California Special Education Management Information System (CASEMIS)
- Data on California Special Education Management Information System Table A 2007, 2008
- Data on California Special Education Management Information System Table B 2007, 2008, 2009
- Data on California Special Education Management Information System Table C 2007-2008, 2008-2009
- Data on California Board of Education School Statistics (CBEDS) 2007, 2008, 2009
- Description of California Board of Education School Statistics
- Data on Child Study Team (CST) for Special Education and Regular Education
- Data on Child Study Team (CST) for Special Education 2007, 2008, 2009
- Documentation for Child Study Team (CST)
- Description of Data Disk Contents for Urban Special Education Leadership Collaborative
- District Data 2009-2010
- District Data for Regular Classroom Enrollment
- District Data on Enrollment Percentage in Regular Classrooms
- District School Site List and Summary
- District Data on Special Education Choice Assignment

Appendix D: Designing Schoolwide Systems for Student Success

Designing Schoolwide Systems for Student Success



Wayne Sailor, *Making RTI Work: How Smart Schools Are Reforming Education Through Schoolwide Response-to-Intervention* (San Francisco: Jossey Bass, 2009).

Appendix E: Segregated Programs Versus Integrated Comprehensive Service Delivery for All Learners

Segregated Programs Versus Integrated Comprehensive Service Delivery for All Learners

Assessing the Differences

ELISE FRATTURA AND COLLEEN A. CAPPER

ABSTRACT

The purpose of this article is to address the principles of a comprehensive whole-school restructuring to serve not only students with disabilities educated in inclusive environments but also all learners who have been labeled to receive services from federally mandated programs, such as special education, limited English, at risk, or Title I. The number of students who qualify for such services is growing. Unfortunately, these students often spend the largest part of their day leaving their classroom to receive special instruction, resulting in a disconnected and fragmented day. We address the outcomes of traditional programs and the underlying principles necessary to support inclusive services versus creating segregated programs. The principles are classified into four cornerstones: core principles, location of services, curriculum and instruction, and funding and policy.

IN THE PAST DECADE, THE RESEARCH LITERATURE ON inclusive education has significantly increased (Peterson & Hittie, 2003). Most of this literature has focused its unit of analysis at the classroom site—for example, on the social and academic outcomes of integrated education (Peterson & Hittie, 2003; Rea, McLaughlin, & Walther-Thomas, 2002), collaborative teaching arrangements (Thousand, Villa, & Nevin, 2002), the role of paraprofessionals (Doyle, 2002), the inclusion of students with disabilities in district and state assessments (Thurlow, Elliott, & Ysseldyke, 1998), or ways to

integrate curriculum (Rainforth & Kuglemass, 2003). Others have offered a conceptual and ideological analysis of the literature in support of and against inclusive education (Brantlinger, 1997). However, the literature that focuses specifically on the role of school leaders with students who typically struggle (Riehl, 2000) or on the organizational, structural, and cultural conditions necessary for inclusion is significantly less comprehensive. Even book-length works whose title suggests a focus on whole school restructuring to serve students (Sailor, 2002) do not address the school or district level organizational and structural implementation intricacies of serving students in heterogeneous classrooms. The aforementioned literature focuses primarily on students with disability labels and does not take into account how providing services for students with disability labels is similar to and different from addressing the needs of other students who may struggle in school; such as those students for whom English is not the primary language; students considered "at risk"; students considered gifted; or students with lower reading levels. Exceptions to this include works by Burrello, Lashley, and Beatty (2000), Capper, Frattura, and Keyes (2000), and McLeskey and Waldron (2000).

The recent comprehensive school reform (CSR) models, by design, come closest to taking such a whole school approach to raise the academic achievement of all students (Borman, Hewes, Overman, & Brown, 2003). However, CSR continues to not set standards for integrated comprehensive

services. Although the literature explains how lower achieving students can experience academic success, it does not articulate how students with disability labels have experienced similar success, nor do we know from this literature to what extent students with disabilities are included in heterogeneous class environments in these models of reform. Furthermore, none of the CSR models take disability as a focus.

The purpose of this article is to address this gap in the literature by taking each school as the unit of analysis and focusing on specific school level organizational conditions necessary for schools to deliver what we call *integrated comprehensive services* (ICS) in heterogeneous environments for all learners. *Integrated* environments are the settings that all students—regardless of need or legislative eligibility—access throughout their day in school and nonschool settings. That is, in these settings (e.g., classroom, playground, library, field trips), students with a variety of needs and gifts learn together in both small and large groups. *Comprehensive services* refers to the array of services and supports centered on a differentiated curriculum and instruction that all students receive to ensure academic and behavioral success. By all learners, we mean especially those learners who have been labeled to receive services, such as students labeled with a disability or labeled "at risk," "gifted," "poor reader," or English language learner (ELL). We will first address why changes in service delivery are vitally necessary, pointing to the current status of special education, including the growing incidence of students labeled with disabilities, the historically poor school and postschool outcomes of special education efforts, and the enormous outlay of financial and other resources into activities with such poor outcomes (Oakes, 2000). We then describe the differences between providing programs for students and bringing services to students via ICS and the principles that should guide the delivery of educational services to all students. What we mean by *service delivery* are the ways in which students are provided with educational services, including curriculum, instruction, assessments, and any additional supportive services that are necessary for the student to be successful in heterogeneous learning environments.

OUTCOMES OF SEGREGATED PROGRAMS

The number of students labeled with a disability has increased 151% since 1989 (Ysseldyke, 2001). Moreover, students of color are significantly overidentified for and overrepresented in special education (Donovan & Cross, 2002; Hosp & Reschly, 2002; Losen & Orfield, 2002; *Quality Counts*, 2004; Zhang & Katsiyannis, 2002). Unfortunately, these students often spend the largest part of their day leaving their classroom to receive special instruction, resulting in a disconnected and fragmented school day (Capper, Frattura, & Keyes, 2000). Moreover, these special programs have failed to result in high student achievement, as measured by postschool out-

comes or standardized scores. For example, in the United States, despite extensive efforts at providing special education for more than 25 years since the implementation of federal disability law, 22% of students with disability labels have failed to complete high school, compared to 9% of students without labels (National Organization on Disability, 2000).

Equally alarming are the poor long-term outcomes of these special education efforts. For example, according to a study by Blackorby and Wagner (1996), "nearly 1 in 5 youth with disabilities out of school 3 to 5 years still was not employed and was not looking for work" (pp. 402–403), whereas 69% of students from the general population over that same period of time found employment. After providing special education to students for at least 18 years in public schools—and in many cases for 21 years as mandated by the special education law—these school and postschool outcomes are indeed dismal.

Not only are the special education outcomes dismal, but the amount of money that educators have put forth to support these failing efforts is staggering. Special programs costs 130% more than general education. That is, if a school district spends \$5,000 per student, then each student labeled for special programs costs that district \$11,500 (Odden & Picus, 2000). In the 1999–2000 school year, "the 50 states and the District of Columbia spent approximately \$50 billion on special education services, amounting to \$8,080 per special education student" (Chambers, Parrish, & Harr, 2002, p. v). In comparison, in 1998, total instructional expenditures for students at the elementary and middle school level who were served in the general education classroom was \$3,920 (Chambers, Parrish, Lieberman, & Wolman, 1998).

On a related point, the more students are served in more restrictive, segregated placements, the higher the cost of their education. For example, Capper, Frattura, and Keyes (2000) noted that

If we serve students with disability labels 25%–60% outside the regular class, then the cost for this education increases to \$5,122. If we provide a program for these students in a separate public facility, like many charter and alternative schools, then the cost increases to \$6,399 per student. (pp. 7–8)

That is, the data are clear that the more students are segregated from their peers for instruction, the more costly that instruction. The reason for this is that "a separate program means that students often require separate space, separate materials and infrastructure, a separate teacher, and an administrator not only to manage the program but also to spend time and money on organizing the program (Capper, Frattura, & Keyes, 2000, p. 7).

Similarly, during the 2000–2001 school year, 10,900 public alternative schools and programs for so-called "at-risk" students were in operation, and 59% of these programs

were housed in a separate facility. Districts with high percentages of students of color and low-income students tended to have higher enrollments in alternative schools (National Center on Education Statistics, 2002, p. 33). Moreover, educators spend an inordinate amount of time and resources deciding exactly for which program a student may qualify. In the Verona (Wisconsin) school district in 1999, "it cost more than \$2,000 to evaluate one student to determine eligibility for special education. [In this case,] a district of 4,500 students averages 225 (5%) evaluations per year for a total of \$443,713 spent on evaluations alone" (Capper, Frattura, & Keyes, 2000, p. 7).

According to the U.S. Department of Education (2000), "Slightly under half [of students with disability labels] between the ages of six and seventeen are served in general education settings with their [typical] peers for more than 89% of their school day . . . and the number of students served in general education classrooms is increasing each year" (cited in Causton-Theoharis, 2003, p. 7), due in part to the Individuals with Disabilities Education Act (IDEA) of 1997, which created "a legal presumption in favor of [general education] placement" (Huefner, 2000, p. 242; Causton-Theoharis, 2003). Research has suggested that educating students in these general education environments results in higher academic achievement and more positive social outcomes for students with and without disability labels (McLeskey & Waldron, 2000; Peterson & Hittie, 2003, pp. 37-39; Rea, McLaughlin, & Walther-Thomas, 2002), not to mention that it is the most cost-effective way to educate students.

Although more of these students are being educated in heterogeneous educational environments than in previous years, increasingly, students who are being labeled at risk are being placed in segregated alternative classrooms and schools

compared to previous years; many students are not served in their neighborhood schools (i.e., the school they would attend if they did not have the disability or other separate program label) and spend large parts of their days out of the general education classroom. These practices are not only failing to meet the needs of these students by resulting in significantly high percentages dropping out of school or not achieving employment after secondary education, but these practices exact an exorbitant financial toll on schools and school districts.

BRINGING SERVICES TO STUDENTS

To overcome these costly, dismal outcomes of segregated programs, school leaders (principals, school-based steering committees, site councils, etc.) must focus their efforts on preventing student struggle and must change how students who struggle are educated. In so doing, fewer students will be inappropriately labeled with disability or at-risk labels, and more of these students will be educated in heterogeneous learning environments, resulting in higher student achievement and more promising postschool outcomes.

Placing students in special programs is quite the opposite of providing services to or with students (i.e., ICS). The two approaches differ in four primary ways, defined here as *cornerstones* of integrated comprehensive services. Those four cornerstones are presented in Figure 1.

THE FOUR CORNERSTONES OF ICS

In our work with educators across the country and with our students, we also hear persistent assumptions about the fac-

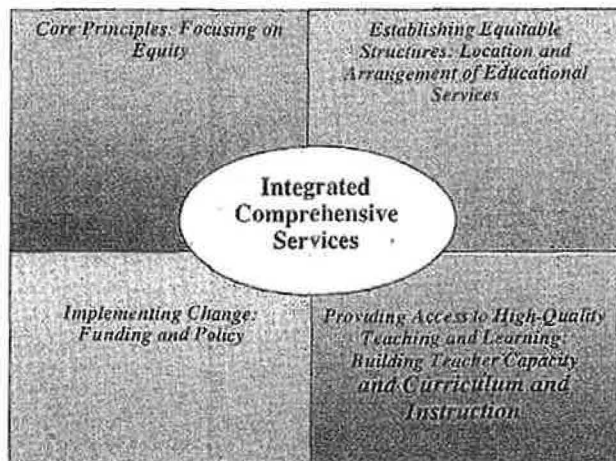


FIGURE 1. Four cornerstones of ICS.

tors that inhibit change toward ICS. As we describe the differences between special programs and ICS, we also identify these assumptions and describe the evidence-based practices that refute these assumptions.

Core Principles

One core principle of segregated special programs is that students do not receive help for their learning needs until after they have failed in some way. This practice is analogous to parking an ambulance at the bottom of a cliff to assist people who fall off the cliff. Special programs are like the ambulance at the bottom of the cliff. Students are placed in them after they fail academically, socially, or behaviorally.

In contrast, with ICS, the primary aim of teaching and learning in the school is the *prevention* of student failure. Referring again to the analogy, ICS works at the top of the cliff, setting up supports not only to prevent students from falling off the cliff, but to prevent them from nearing the edge of the cliff in the first place. It is astounding to us that so few educational practices are considered preventative. One activity we conduct in our classes is to have students write out on newsprint their response to the following question: "What happens in your school or classroom when a student struggles, academically, socially, or behaviorally? What are all the practices in place to address this?" Invariably, students easily list an entire conglomeration of "ambulances," numbering usually a dozen items even in small schools and districts. The list includes items such as homework club, learning centers, peer tutors, adult volunteers, Title I reading, Reading Recovery, school within a school, small-group tutoring, Saturday morning remedial club, summer school, calling parents, in and out of school suspension, and the list goes on. Then we ask our students to list all the actions their school or district takes to prevent student academic or behavioral failure or struggling in the first place. This question is usually followed by several minutes of quiet, as such efforts do not readily come to students' minds. Finally, students will list a few practices such as focused, intensive reading instruction in the early grades or differentiating instruction.

According to Deschenes, Cuban, and Tyack (2001), historically, public schools have dealt with student failure in similar ways—by blaming the student. With ICS, the onus of student failure is on the school, and any student failure is viewed as something that is askew in the educational system. The way educators frame student failure (i.e., whether student failure is seen as a student or a systems issue) is the pivotal point of all the remaining assumptions and practices in schools.

As such, the primary aim of ICS is the prevention of student failure, and student failure is prevented by building teacher capacity to be able to teach to a range of diverse student strengths and needs—a second core principle. Every single decision about service delivery must be premised on the question to what extent that decision will increase the capac-

ity of all teachers to teach to a range of students' diverse learning needs. Segregated special programs, by definition, diminish teacher capacity. When the same student or group of students are routinely removed from the classroom to receive instruction elsewhere, the classroom teacher is released from the responsibility of learning how to teach not only those students, but all future students with similar needs over the rest of that teacher's career. At the same time, students with and without special needs are denied the opportunity to learn and work with each other, and the students who leave the room are denied a sense of belonging in the classroom.

A third core principle of separate programs is that their efforts do not address individual student needs. Instead, students are made to fit yet another program. Even the language that is used often reflects this idea. That is, we use language such as "We need to program for this student," "We held a meeting to program for this student," "We can place the student in the CD program," "That school houses the ED program." Finding students to fit into a program is a supreme irony of programs that are created under the assumption that students do *not* fit into general education, and hence they need something unique and individual—only to be required to fit into yet another program. A persistent assumption with this principle is that it is administratively easier to plug a student into an existing program than to creatively plan how to best meet a student's academic or behavioral needs (both of which are mandated in special education legislation).

When educators in a school have made significant progress toward restructuring based on ICS principles, one practical way to avoid placing students in prepackaged programs and to meet individual student needs can take place in Individualized Education Program (IEP) meetings. In these meetings, practitioners who are working toward dismantling segregated programs and moving to ICS have found it helpful to assume that *no* separate programs exist in their schools. They ask themselves the question, "If no such program existed, how would we best meet this student's needs? And how can that decision ultimately build teacher capacity?"

In addition to the core principles that distinguish ICS from segregated programs, these two different models of service delivery also differ from each other based on location (i.e., where students are taught), curriculum and instruction, staff roles, and funding. We discuss these next.

Establishing Equitable Structures

Location—where students are physically placed to learn—is a central distinction between segregated programs and ICS. Under a segregated program model, educators believe that the primary reason for student failure is the student him- or herself, that students cannot be helped until they fail and receive a label of some sort (e.g., at risk, disability, poor reader), and that the student is then best placed into a separate program that is removed from the core teaching and learning of the school. These beliefs and practices then require students to be

separated from their peers by requiring students either to leave the general education classroom to attend a pullout program or to attend a school not in their neighborhood or a school they would not attend if they did not have a special label.

Furthermore, students with a particular label are clustered in a classroom or program in numbers greater than their proportion in the school. In the case of students with disabilities, typically, a special education teacher is assigned to support the students in this classroom and perhaps two to three other classrooms where students with disabilities are clustered. In one of the high schools we studied, students considered "at risk" were all placed in the same "transition" English and "transition" Math classes in their freshman year, taught by a "transition" teacher in a "transition" room. For ELL students, the students are often clustered together and assigned a bilingual or English as a second language (ESL) teacher for nearly their entire day.

The problem with clustering students is that often special education or student services staff are assigned to the students with labels in these classrooms. Although the special education or student services staff may assist other students in the classroom without labels, his or her primary role is student support. That is, in a segregated, clustering arrangement, the primary goal is student support, not building the teaching capacity of general education teachers to teach to a range of students. The result of such an arrangement is increased dependency. Students with labels and the general education teacher become increasingly dependent on the student services staff. Including students with their peers is dependent on the presence of student services staff. In nearly every situation we have studied, when (e.g., because of budget cuts) student services staff time in these classrooms must be reduced, general education teachers claim that they cannot fully meet the needs of students with labels in their classrooms. This occurs especially in coteaching models, where a special education and general education teacher are assigned to coteach a class or course together—arguably one of the most common and most expensive practices in schools today.

In addition to educator convenience, segregated practices persist because many educators believe that it is more cost effective for educators to cluster students with similar labels in particular classrooms or particular schools. Research cited previously in this article has refuted this belief. Moreover, this particular administrative arrangement makes little sense with the current federal support for cross-categorical services. Now, state departments of education are issuing special education teaching licenses for teachers to be able to teach across categories, because these teachers are expected to be able to teach to a range of student needs. Thus, school districts can no longer use the argument that only particular teachers can provide particular support for particular students.

Moreover, with segregated programs, educators persistently assume that they can only provide individual attention and support to students with labels in a setting or situation

separate from those students' peers. Reasons for this assumption include several arguments—for example, that a middle school student would feel embarrassed to receive speech articulation training in front of his or her peers, or that if elementary students require intensive reading instruction, then this instruction requires a separate setting, like a Title I or Reading Recovery room. Educators reason that this saves students embarrassment about reading in front of their more able peers and that a separate room cuts down on classroom distractions. To be sure, it may be appropriate at times, when a student requiring speech articulation skills could benefit from individual instruction outside of the classroom that does not disrupt his or her school day. At the same time, when schools and classrooms function with teams of diverse educators in support of flexible groupings, a student's need for one-on-one instruction is part of the general movement of the day and does not force the student to be the only student exiting the classroom, for example, during a science class. In the reading example, at the elementary level, successful teachers are able to meet the individual needs of students without those students needing to be pulled from an integrated environment.

At the middle school and high school level, when teachers are faced with students with low reading levels, at times, these students may need intensive reading instruction separate from their peers. The use of a computer-assisted reading program such as *Read 180*, is one such example. However, based on ICS principles, students *choose* to access this course or class and are not unilaterally placed in it. Moreover, students who receive this instruction do so not by virtue of their label (e.g., all "at-risk" students assigned to the course, or all "LD" students assigned); rather, a heterogeneous group of students receives the instruction based on need, not label. More important, rather than this same group of students being assigned to other classes together (e.g., they are all assigned to take the same science class), these students are not grouped together for any other part of the school day.

Referring again to a high school example, educators have argued that placing all the students "at risk" in language arts together in a freshman "transition" English class will allow the teacher to use curriculum materials suited to the reading levels of these students and, in so doing, raise the English achievement of these students, enabling them to be integrated with their peers after their freshman year. Aside from the fact that we have yet to find special programs that collect sufficient outcome data, teachers in highly successful schools in the context of ICS are able to teach language arts and other subjects to a range of different learners in heterogeneous classrooms (Jorgensen, 1998).

Ironically, under segregated program assumptions, we have seen inclusive practices evolve into another segregated program—that is, the segregation of inclusion. Segregated inclusion happens when students with disabilities are disproportionately assigned to or clustered in particular classrooms. For example, in a school with four third-grade classrooms, students with disabilities are clustered into one or two of

these classrooms, in numbers that result in a higher percentage of students with disabilities in these classrooms than their overall percentage in the school. Educators have argued that these practices are legitimate, because it then becomes more convenient for special education staff to support students across fewer classrooms. We have witnessed educators in these schools calling these particular classrooms "the inclusive classrooms" or "inclusion programs" and the students with disabilities in these classrooms "inclusion" students. In so doing, these classrooms and students, in the guise of inclusion, inherit yet another set of labels. Educators reason that if a practice is more convenient for staff, then students will receive higher quality services in these segregated arrangements. In the schools we have studied, unfortunately, although clustering students may be more convenient for staff, this model does not build teacher capacity. That is, although the "inclusion" and "transition" teachers increase their capacity to teach to a range of students, all the *other* teachers in the school are "off the hook," with no incentive to gain these skills, resulting in higher costs and less effectiveness in the long run.

In contrast, under ICS, all students attend their neighborhood school, or the school they would attend if they did not have a label. This is a basic civil right. Students do not have to leave their peers in their classroom, school, or district to participate in a curriculum and instruction that meets their learning needs. All students are then afforded a rich schedule of flexible, small-group and large-group instruction based on learning needs, interests, and content areas. With ICS at the district level, particular schools would not be designated "the ESL school" or "the school that all the elementary students with severe disabilities attend" or "the middle school that houses the students with severe challenging behaviors." At the school level, ICS does not preclude students with labels from being clustered in particular classrooms, but only to the extent that the number of these students in any one classroom does not represent a higher percentage than found in the school. Accordingly, with ICS, a school does not have rooms labeled the "resource room," the "LD room," the "CD room," the "ESL room," or even the "at-risk room." With ICS, students are flexibly grouped based on the individual needs of the group of learners in the particular classroom and grade.

Accordingly, with ICS, *all* students' learning takes place in heterogeneous environments. This means that students are never grouped by similar characteristics in the same way all the time. Teachers use flexible grouping patterns throughout the day, depending on the instructional content and student needs. Hence, when a group of students travels on a field trip, it should not just be students with disabilities or students who are "at risk" who are attending. Nor should it just be students without labels attending. The leader will look at any situation and always ask if there is a mix of students involved and, if not, why not?

Under ICS, students are placed in classes according to their natural proportions in the school. For example, if ELL

students constitute 20% of the students in a school, then any classroom in the school (e.g., special education) should be composed of no more than 20% of ELL students. If students with disabilities represent 15% of the school population, then no classroom should have more than 15% of its students labeled with a disability. Likewise, using these same numbers and the principle of natural proportions, at least 20% of the student council, 20% of the band and other extracurricular programs, and 20% of the advanced placement courses or gifted programs should be composed of ELL students, and 15% of these same curricular and extracurricular areas should be composed of students with disabilities. To further illustrate, in one of the integrated middle schools we studied, students who were ELLs were clustered in two of the four seventh- and eighth-grade classrooms. However, the percentage of ELL students in these classrooms was less than their percentage in the school. In the high school example, students in need of additional support are dispersed amongst the freshman English classes. When students are placed in natural proportions, it sets the expectation that all school staff be able to teach a range of students. The goal of support staff becomes initially to support students in these settings, but ultimately to build the general educator capacity to teach to a range of students. Over time, one goal of support staff is to fade their involvement in the classroom, because the general classroom teacher has strengthened her or his teaching and learning strategies to meet a range of student needs.

We cannot overemphasize the critical role that location—where students are placed—plays in ICS. As long as segregated settings, classrooms, courses, and schools exist, educators will find reasons to place students in these settings. With segregated programs, these settings reinforce negative assumptions about students and teaching and learning, and not only does this model not build teacher capacity, it breeds teacher and student dependency. Even more important, segregated programs are the most expensive and least effective way to serve students. ICS becomes a proactive means to break the vicious cycle of negative beliefs that then require segregated programs that in turn reinforce negative assumptions and beliefs. When the core principles of ICS suggest that the system needs to adapt to the student, that the primary aim of teaching and learning is the prevention of student failure, that the aim of all educators is to build teacher capacity, and that all services must be grounded in the core teaching and learning of the school, then students must be educated alongside their peers in integrated environments. Student location dictates teacher location, and the location of teachers and students in integrated environments lays the groundwork for all the other aspects of ICS.

Building Teacher Capacity and Curriculum and Instruction

Location. Educator roles in segregated programs are based on teacher specialization and student labels. In segre-

gated programs, staff adhere to their professional, expert roles, which limits adult learning opportunities and professional growth. Moreover, when structures isolate students, they also isolate educators. When educators are isolated from each other, they do not share knowledge and expertise with each other, precluding the development of teacher expertise across a range of learners. For example, in one of the urban high schools we studied, the support staff in a program model were comfortable teaching segregated math and adapted language arts classes, but they were hesitant to provide support in general education classes in science and math, because they were unsure about their ability to do so. Therefore, students with special needs were placed in segregated math classes due to the teaching abilities of staff and denied a rich curriculum in the general education math content classes. In turn, the students performed quite poorly on the math section of the statewide accountability assessment.

A persistent assumption that fuels this adherence to expert roles is the belief that certification in a specialty area means that an educator possesses highly specialized, "magical," esoteric skills that no one else can ever learn. Professional associations and professional accrediting or certification bodies reinforce this expert view (Skrlic, 1995). For example, in segregated programs, a social worker can be the only person who conducts personal history reviews with students and makes contacts with families, and no other staff person volunteers or is assigned to share in those duties. Likewise, in segregated programs, a middle school guidance counselor provides career guidance to individuals and groups of students, facilitates support groups for students, and meets individually with students with various problems. Rarely do other staff members share these duties.

In segregated programs, if other staff not certified in these areas assumed some of these duties, the social worker or guidance counselor would view these persons as undermining the professionalism of their careers and perhaps even threatening his or her job security. With these assigned duties, neither the social worker nor the guidance counselor is involved in the core curriculum and instruction of the school. In this context, professional development is often targeted to particular staff (e.g., all special education staff), whereas other staff are excused, which further segregates staff from each other and prevents the sharing of expertise.

In contrast, with ICS, in one of the middle schools we studied, the principal drastically changed the roles and responsibilities of the guidance counselors and school social workers. One guidance counselor was assigned to support the sixth grade, and the other was assigned to support the eighth grade, whereas the social worker was assigned to support the seventh grade. The role of the guidance counselors and the social worker changed to include the following tasks: making home visits; sharing door duty; readmitting students; representing on all special education team meetings; supporting staff; collecting and disseminating data on achievement, attendance, and behavior; handling all special education re-

evaluations; teaching units on identity (e.g., race, ethnicity) and bullying; coordinating interns; and coordinating mentoring with local high school students. These roles and shared expertise, tied to the core curriculum and instruction, stand in great contrast to what typically occurs in segregated programs.

Location is where students are assigned and how staff roles are inextricably linked. In segregated programs, the limited expertise of staff contributes to where students are placed, and where students are placed limits the expertise of staff. All students require small- and large-group instruction, and, at times, one-on-one instruction for a student with more severe needs. However, rather than expecting students with educational or behavioral needs to leave the classroom to receive instruction, ICS requires educators to share their knowledge across disciplines (special education, at risk, bilingual, Title I reading, etc.) with their peers and with the students they teach in a range of educational environments.

As such, with ICS, staff roles pivot on developing teacher capacity to teach a range of learners in their classrooms. Given that only 21% of teachers feel well prepared to address the needs of labeled students (U.S. Department of Education, 2000), building teacher capacity becomes the primary goal in ICS. All staff development and all decisions about service delivery are aimed toward building staff capacity to work with a range of student needs.

Curriculum and Instruction. In segregated programs, the curriculum and instruction are separate from the core teaching and learning in the school. For some programs, at one end of the spectrum, it is assumed that the curriculum and instruction have not succeeded with a student; hence, the student needs an entirely different curriculum and instruction. Again, the assumption made is that the school curriculum does not need to change, that it works for most students, and that there is something inherently different about some students who need something entirely different. Moreover, this principle assumes that staff are incapable of teaching to a range of students, that schools are incapable of changing to meet student needs, and that students are more alike than different. Segregated programs also assume that students need to be identified and labeled to access a curriculum that meets their needs. In so doing, these programs deny students access to a content-rich curriculum, which in turn negatively affects student achievement and results in poor performance on standardized assessments. Instruction is based on the classroom majority rather than on individual needs. Alternative schools—whether within schools or out of school buildings—are often created on this assumption. Students who receive "specialized" math, English, or other academic subjects in resource rooms or in classrooms tracked for this purpose are also supported by this assumption.

At the other end of the spectrum in special programs, special education staff assist students who struggle by helping them learn the general education curriculum, but this

learning takes place outside the general education classroom—in resource rooms, study centers, or study halls. It could be argued that these practices are not separate from the core teaching and learning of the school. However, again, these practices typically do not build teacher capacity to teach to a range of students. Although students are assisted, support staff typically do not share ideas with classroom teachers, who then do not learn new strategies that would prevent their students from needing additional assistance in the first place. Students are then denied access to a content-rich curriculum. In contrast, in ICS, students receive their instruction with their peers in large and small, flexible, heterogeneous groups in integrated school and community settings and are supported to do so. As such, ICS is seamlessly tied to and grounded in the core curriculum and instruction of the school.

In ICS, the curriculum and instruction are built on a culturally relevant (see Ladson-Billings, 1995) and differentiated curriculum (Tomlinson, 2001). *Culturally relevant* means that the curriculum addresses the various families, cultures, races, and ethnicities of students in the classroom not as an added component but seamlessly woven into the curriculum. *Differentiated curriculum* is designed to address a range of learner needs and achievement levels. Such curriculum is developed under the principle of universal access (Bremer, Clapper, Hitchcock, Hall, & Kachgal, 2002). *Universal access* means that a lesson is initially designed for a range of learner needs in the classroom—rather than developing a lesson or curriculum and then deciding as an afterthought how students with different learning needs may access the curriculum. With these curriculum principles, students do not have to qualify or be labeled to receive access to a rich and engaging curriculum.

Implementing Change

In segregated programs, separate funding sources are accessed, and policies are written to support each program for each eligibility area, causing replication of services and soaring costs. These policies and programs are focused on fixing student deficits. Often, these policies are compliance driven and not quality driven, meeting the letter of many nondiscrimination regulations but never attaining the spirit in which these regulations were written. As discussed previously, separate programs are costly due to the cost involved in identifying students and the duplication of staff and materials between schools and programs and across programs.

Educators persistently assume that particular funds or resources cannot be commingled, thus reinforcing the creation of segregated programs. For example, in one of the high schools we studied, educators established a learning center that any student could access throughout the day to receive additional support. The center included processes to enable teachers who assisted in the center to provide feedback to students' teachers on effective strategies to assist students in the classroom and to provide suggestions for curriculum changes

to reduce the number of students who accessed the center. However, the principal was concerned that because students with disability labels also accessed the center, this practice in some way violated special education law or the use of special education funds (which it did not). Hence, he dismantled this service and, in its place, established a separate support program for students with disabilities.

With ICS, funding sources and policies are merged, with a focus on the prevention of student struggle. Resource reallocation forms the basis of funding decisions (Odden & Archibald, 2001). That is, a school leader takes into account sources of funding at the federal, state, district, and school levels (e.g., minority student achievement, gifted and talented, alcohol and other drug abuse, special education, Title I, at risk, bilingual, special education) and then combines these funds in such a way as to best serve students in heterogeneous learning environments. Staff are also viewed as resources, staff skills and expertise are considered, and staff are assigned to students and classrooms based on ICS core principles.

SUMMARY

To summarize, segregated programs result in some students receiving support, while others do not. With segregated programs, those students who need the most routine, structure, and consistency in their day experience the most disruptions when placed in separate programs, become fringe members of their classroom community, and miss valuable instructional time when traveling to and from separate programs. Once in these programs, students are denied access to a rich and engaging curriculum that could boost their academic achievement. Segregated programs inadvertently blame and label students and marginalize and track students of color and low-income students. Segregated programs prevent the sharing of knowledge and skills by educators, prevent any particular educator from being accountable to these students, and enable educators not to change their practices. The programs themselves and the identification of students for these programs are quite costly.

In contrast, the principles and practices of ICS contribute to five nonnegotiable requirements for service delivery: least restrictive, least intrusive, least disruptive, least expensive, and least enabling. These five nonnegotiable points refer to location, or where students are placed, the curriculum and instruction they experience, and the role of educators in their lives.

All students should have the opportunity to attend their neighborhood school (or the school of their choice in school choice programs) and be placed in heterogeneous classrooms at their grade level alongside their peers. This placement is the least restrictive, least intrusive, and least disruptive in their daily lives; encourages independence in learning and not being overhelped (i.e., least enabling); and ultimately is the least expensive. The curriculum and instruction that students