



Comprehensive Review of Special Education, Ages 14-21

Northern Valley Regional High School District

Executive Summary
October 2018

Executive Summary

Northern Valley Regional High School District (NVRHSD, Northern Valley, or the District), located in Bergen County, New Jersey, is a public high school district, serving students ages 3 to 21. NVRHSD is comprised of three main campuses: Northern Valley Regional at Demarest, Northern Valley Regional at Old Tappan, and Northern Valley Central in Norwood. It acts as a fiduciary agent to the Bergen County Region III Council, the Northern Valley Curriculum Consortium; and it offers eight alternative special education programs for students ages 3 to 21¹. PCG's special education program review of NVRHSD is limited to the District's high school programs, ages 14-21, at Northern Valley High School at Old Tappan and Northern Valley High School at Demarest, and includes the Summit House.

NVRHSD is the receiving high school district of seven neighboring school Districts: Closter Public School District, Demarest School District, Harrington Park School District, Haworth Public School District, Northvale Public School District, Norwood Public School District, and Old Tappan Public School District.^{2 3}

According to data provided by NVRHSD, the District had 2,302 students ages 14-21 enrolled during the 2017-18 school year. And according to the April 2018 NVRHSD Budget Presentation, enrollment in the District's two high schools has decreased by 168 students since the 2015-16 school year within the high schools.⁴ Approximately 16.6% of NVRHSD's students ages 14-21 receive special education services through an IEP, and approximately 5.8% students receive accommodations through a 504 Plan.

Within northern New Jersey, NVRHSD is well-known and respected as a high performing district, with a reputation for offering its students rigorous courses that prepare them for college and career. The District and its students have been the recipients of several national accolades.⁵ NVRHSD is also known for providing a broad array of special education programs and services for students ages 14 to 21, including its Bridge Program, its STEP Program, and its Summit House Program. Additionally, NVRHSD was an early adopter to inclusion and co-teaching; the district and its teachers continue to be firmly committed to both. Many of the NVRHSD's teachers and paraprofessionals have been with the District for 20+ years and are extraordinarily committed to the success of its students and the District. Since the 2014-15 school year, NVRHSD has had a 1:1 laptop initiative, offering all students a laptop. This initiative has benefitted all students, but has served as a great "equalizer" for students with disabilities who utilize assistive technology for access to the general curriculum.

NVRHSD's graduation, drop-out, and inclusion data for students with disabilities are commendable relative to the performance of other similar school districts. As cited in PCG's Final Report, Section II. Characteristics of the NVRHSD Special Education Population, in 2017, NVRHSD's graduation rate for students with disabilities was 100%. Since 2012-13 NVRHSD's drop-out rates for students with disabilities was substantially lower than the state average. In addition, NVRHSD is educating students with Emotion/Behavior Disabilities; Health Impairments; Specific Learning Disabilities; Intellectual Disabilities; and Multiple Disabilities in inclusive settings with typical peers at significantly higher rates than state and national averages.

¹ Eight in-district alternative education programs: Step, Bridge, Summit Academy, Access, TIP, Slice, Little Tots, Valley, Summit Success.

² The Northern Valley Curriculum Consortium serves as a centralized curriculum office to NVRHSD, Closter Public School District, Demarest School District, Harrington Park School District, Haworth Public School District, Northvale Public School District, Norwood Public School District, and Old Tappan Public School District. The Consortium also provides a professional learning program that consists of over 100 workshops, annually.

³ Bergen County Region III Council is an entity that provides special education transportation coordination, inter-regional workshops, independent evaluations, behavior consultants, social skills, and an afterschool Big Brother Big Sister program.

⁴ April 2018 Annual NVRHSD Budget Presentation.

⁵ According to the NVRHSD website, "...last school year Northern Valley produced 4 National Merit Finalists and 33 National Merit Commendations. In addition to offering over 47 rigorous honors courses, Northern Valley offers 30 Advanced Placement courses. In May, 2017, 662 students took 1245 AP tests, with 75% of our scored tests earning a 3 or higher. 173 AP students were recognized as AP Scholars. Furthermore, our Class of 2017 averaged SAT scores of 591 in Critical Reading, 636 in Math and 615 in Writing. The same class averaged 26.4 on the ACT." <<https://www.nvnet.org/>>

NVRHSD administrators speak to the concept of “if you build it, they will come” when discussing the District’s alternative special education programs. Administrators say that people from across the region continue moving to NVRHSD so their children can be enrolled in these programs, thus increasing the districtwide enrollment of students with disabilities.

Over the past two years, the District’s special education programming has been in the spotlight—through litigation in the US District Court of New Jersey, a complaint to the New Jersey Department of Education Office of Special Education Programs, the circulation of a report on college prep courses created by an Ad Hoc Committee of the NVRHSD Board of Education, outcry in response to a health insurance benefits reductions for paraprofessionals, and subsequent public meetings on these matters. Concurrently, the District experienced a change in leadership, from a two-year interim superintendent to a newly appointed superintendent, as well as the addition of an Assistant Superintendent with a job description that focuses on instruction, innovation, and internal capacity-building. Through all of this, there has been a marked sense of urgency around providing access and opportunities to all students with IEPs—may they be enrolled or seek enrollment in AP, honors, college prep, college prep enriched, or resource room replacement courses.

As a high school district, NVRHSD is in a unique position relative to K-12 comprehensive districts in the state. On one hand, NVRHSD has the unique opportunity to focus and fine-tune its academic, social, and emotional programming to the specific needs of high school students. Conversely, NVRHSD has limited influence over the grades K-8 special education programming and instructional decisions made on behalf of the students it receives from its seven sending districts. Although the high schools share a Director of Curriculum with the seven sending school districts through its Northern Valley Curriculum Consortium, the NVRHSD Child Study Team’s direct involvement with these students does not occur until they are in the 8th grade⁶. Furthermore, while the special education director of NVRSHD and its respective feeder schools have interactions about enrollment, special education programming, and diagnostic evaluations, there is very limited interaction about the continuity of curriculum for students with disabilities, and assessments, instruction. According to administration, there has been improved feedback around collaboration on IEP development and configuration.

This unique challenge of “inheriting” choices from its sending districts has a profound impact on a student’s high school programming — disability classification decisions, IEP goals, classroom resources, and out of district placements, to name a handful key of decisions. Combined with that, NVRHSD has a belief structure that is rooted in the high school students it serves, predominately ages 14-18. This focus presents several opportunities but also poses potential hindrances. For example, whereas neighboring K-12 districts encourage consistent districtwide programming around multi-tiered systems of support (MTSS) and positive behavior supports in schools (PBIS), there are many staff members in NVRHSD who inaccurately believe that such initiatives do not apply to high school students, and only belong in K-8 settings.

In an effort to ensure that NVRHSD is supporting equity and access for all of its students with disabilities, NVRHSD contracted with PCG to provide an in-depth analysis of the District’s programming, processes, and staffing. Although this report documents matters of concern, these observations are used to formulate recommendations to improve the academic performance and social/emotional outcomes of students with disabilities and to support a fundamental principle that “special education is a service (or services) and not a place.”

Acknowledgements

The PCG team thanks the many individuals who contributed to this review of NVRHSD’s special education services, including Mr. James Santana, Superintendent; Ms. Deborah Sarmir, Assistant Superintendent;

⁶ It is important to note that some indirect interactions do occur between NVRHSD CSTs and middle school students in feeder districts before the 8th grade. Identifications and projections for alternative programming begins in middle school with team collaboration and participation in IEP meetings and annual observations in 5th through 7th grade and bi-annually in the 8th grade.

Ms. Barbara Battaglia, Director of Special Education; Dr. Courtney Moran, Assistant Director of Special Education; Ms. Joannette Femia, Business Administrator; Ms. Colleen Briggs, Assistant Business Administrator; and Ms. Julie Bookstaver, Assistant Systems Support Operator. Their efforts were critical to the team's ability to obtain a broad and detailed understanding of NVRHSD so that we could present the best possible recommendations for improving special education and related services for the District's students. Our team greatly appreciated each of these individuals' commitment to ensuring that PCG received well-documented, thorough information from a range of stakeholders.

Methodology

In an effort to develop a plan that focuses on ensuring equitable opportunities and improved educational outcomes for students with disabilities (SWDs), NVRHSD identified Public Consulting Group (PCG) to provide an analysis of the District's special education services, staffing, organizational structure, and processes. Work began with an on-site Project Kick-off: a day-long discussion that included the Superintendent, Assistant Superintendent, the Director of Special Education, members of the Board of Education, parents, special education and general education teachers, building principals, and members of the Guidance Department.

In June 2018, PCG spent three days on-site at Northern Valley at Demarest and Northern Valley at Old Tappan as well as the NVRHSD Board Office to conduct 28 interviews and focus groups with over 180 stakeholders, district-wide. PCG worked closely with NVRHSD to determine the best outreach and communication methods for focus group and interview participation. PCG provided a sample schedule and list of positions required to participate. Focus groups for special education and general education teaching staff were scheduled during the school day. Also, student file review focus groups for special education teachers and related service providers were scheduled during the school day. In order to ensure adequate participation in each group, the Special Education Department sent an email to special education staff requesting their participation.

In order to gain an understanding of how special education programs operate broadly within the District, organizational focus groups and interviews were designed to include a range of stakeholders. Focus groups generally consisted of 10-12 participants, while interviews ranged from 1-3 participants. Supervisors did not participate in the same focus group or interview sessions with their staff members, in order to give all staff an opportunity to speak candidly and honestly.

Central office staff included representatives from the following departments:

- Office of the Superintendent
- Office of the Assistant Superintendent
- Special Education Department
- Curriculum Department
- Business Office
- Technology Office

School based staff included representatives from the following groups:

- School-based Administrators
- Special Education Teachers
- General Education Teachers
- Related Service Providers

Family and Community representatives included:

- School Board Members

- Parents/Families

In addition to interviews and focus groups, PCG conducted a series of student-centered file review focus groups. In a student-centered file review focus group, teachers and related service providers had conversations about school-based practices through a review of redacted student Individualized Education Programs (IEPs) and redacted Section 504 Plans. The use of these documents as artifacts provided additional insight into the alignment of policies and practices from the central office to school levels. Through these conversations, PCG gathered data that addressed themes related to special education management, student identification, programs and services, curriculum and instruction and staffing, while addressing specific process questions about the development of IEPs, their implementation, and documentation. Participants included special education teachers, general education teachers, and related service providers.

On September 27, 2018 the PCG team returned to the District for one day to conduct classroom walkthroughs at the Demarest and Old Tappan high schools, the Bridge Program, the STEP Program, Summit House, and the Access Program (a program administered by Valley Regional Programs in collaboration with the high school special education staff). Walkthroughs occurred in special programs, CP (both co-taught and non-co-taught), CPE, Honors, and AP courses, all including students with IEPs.

In addition, on September 27, 2018, PCG conducted two student focus groups: one at Old Tappan and the other at Demarest, for students with disabilities. Districtwide invitations were sent to all families of students with disabilities. Students from both high schools, the District's alternative programs, as well as out-of-district placements were represented in these focus groups. The groups of students were asked questions in the following areas: (1) Academic; (2) Self-advocacy and Transition; (3) School Climate; (4) Motivation and Assistance; and (5) Activities Outside of Class.

On October 15, 2018, members of the PCG team presented its Final Report to the NVRHSD Board of Education during its public meeting.

Guiding Research Questions

PCG worked with NVRHSD to develop a set of research questions. These following questions guided PCG's analysis throughout the review:

- To what extent is the **I&RS/NJTSS process** used across schools to support struggling students?
- How are **instructional supports and services** provided to students with IEPs? What service delivery models are used? How do the resources, materials, instructional practices, and assessments offered in CP and CP-E courses differ between students with and without IEPs?
- How are **IEPs written and delivered**, and to what extent does the District comply with state and federal requirements and local policies and procedures?
- To what extent are **Section 504 modifications/accommodations** used to support struggling students?
- To what extent do the **organizational structures** in the Special Education Department, and NVRHS at large, support quality programming for students with disabilities? Are **staffing ratios** at different levels in the organization appropriate? Are staff over- or underutilized in certain areas?
- What are the major areas of expenditures in the **special education annual budget**? What are the major cost drivers, how are finances managed, and where are the opportunities for greater efficiencies?

PCG's findings and recommendations related to programs, policies, and practices resulted from an analysis of four data sources. Components included: **Data and Document Analysis, Focus Groups and Interviews, School Walkthroughs**, and **Student File Reviews**. These four components drew from a fifth

component, the **Research and Practice Literature**, to inform the findings and recommendations. To the extent possible, PCG used publicly available achievement and financial information to compare key NVRHSD data against comparable district, state, and national data.

No participants are personally referred to or quoted in the report, although school district position titles are referenced when necessary for contextual reasons.

PCG Foundational Approach

PCG's approach to its work with school districts is as a thought partner. That is, we act as an experienced outside agent, with an objective perspective, that works alongside school districts to identify challenges and provide recommendations for improvement. We follow a mixed methods **Collaborative Program Evaluation** model that is systematic, based upon both qualitative and quantitative research methods, and produces credible and valid data that proactively informs program implementation, determines gaps, and offers recommendations for the continued improvement of the program.⁷ We value the importance of developing trust, open communication, and fostering collaboration between the review team and program staff. Our philosophy for guiding the transformation of special education in schools and divisions is driven by the U.S. Department of Education's Results Driven Accountability (RDA) framework and rooted in key tenets of the Schoolwide Integrated Framework Transformation (SWIFT) model - both of which are described below.

Results Driven Accountability

In 2013, the U.S. Department of Education's Office of Special Education Programs (OSEP) recognized that the educational outcomes of children and youth with disabilities have not improved as much as expected even with intensive federal regulatory oversight and funding provided to address closing achievement gaps. The Department subsequently announced movement toward prioritizing improvement of outcomes for students with disabilities, from a one-size-fits-all, compliance-focused approach to general supervision to a more balanced system that looks at results and outcomes.⁸ This approach is consistent with the Individuals with Disabilities Education Act (IDEA), which requires the primary focus of monitoring to be on improving educational results and functional outcomes for students with disabilities and ensuring that states meet IDEA program requirements. RDA fulfills these requirements by bringing into focus the educational results and functional outcomes for students with disabilities while balancing those results with the compliance requirements of IDEA.⁹ When providing guidance to school districts, PCG offers recommendations that strike this balance as well.

Schoolwide Integrated Framework Transformation (SWIFT) Model

Based on research related to the improvement of achievement and social/emotional outcomes for students with disabilities, the SWIFT model has received recognition by and support from OSEP.¹⁰ SWIFT refocuses existing traditional educational approaches to general and special education and expands inclusiveness for students covered by Title 1, those from low-income backgrounds and English Learners (ELs).

According to researchers and practitioners at the University of Kansas, and as validated by members of the PCG review team's experience working with districts nationally, there are six critical issues facing public schools which have suppressed academic and social/emotional outcomes for students and must be addressed to reverse this trend: (1) fragmented support "silos" and lack of family partnership with schools;

⁷ Donis-Keller, C., Meltzer, J., and Chmielewski, E. The Power of Collaborative Program Evaluation, A PCG Education White Paper, 2013. (<http://www.publicconsultinggroup.com/education/library/index.html>)

⁸ April 5, 2012, RDA Summary, U.S. Department of Education at www2.ed.gov/about/offices/list/osers/osep/rda-summary.doc.

⁹ *Id.*

¹⁰ The SWIFT Center's work was supported by a \$24.5 million grant from the U.S. Department of Education's Office of Special Education Programs to support SWIFT implementation in states and school Districts across the country and remains one of the leading frameworks for school improvement. See for more information see the SWIFT website at www.swiftschools.org.

(2) achievement gaps between subgroups of students based on social, language and/or disability characteristics; (3) lack of student engagement and behavior that impedes learning; (4) lack of implementation of both systems level and student-level evidence-based interventions with fidelity; (5) lack of knowledge sharing and resource availability; and (6) lack of sustainability and replication of successful schoolwide models of inclusive education.

SWIFT's five core domains for school and district improvement are backed by research and growing evidence that addressing the above six issues is critical for improving outcomes for SWDs. The domains include a Multi-Tiered System of Supports (MTSS), which provides interventions and support for students at varied levels of intensity and focuses on the importance of good first teaching, and a Universal Design for Learning curriculum and instruction. It aims to build school capacity to provide academic and behavioral support to improve outcomes for all students through equity-based inclusion. The domains, in detail, are:

- **Administrative Leadership.** A deeply engaged administrative leadership that is committed to transformative inclusive education.
- **Multi-Tiered System of Supports (MTSS).** Use of MTSS where all academic and behavioral instruction is delivered through a schoolwide data-driven system utilizing universal design at all grade levels.
- **Integrated Educational Framework.** A strong and positive school culture creates an atmosphere in which everyone feels like they belong. To the extent possible, all students participate in the general education curriculum and instruction and activities of their grade level peers. Schools embrace ways to redefine roles of paraprofessionals and teaching assistants to support all students.
- **Family/Community Partnerships.** Family and community partnerships are formed and families are actively engaged in both the organizational makeup of the school as well as their child's education.
- **Inclusive Policy Structure & Practice.** District-level support and integrated policy structure are fully aligned and remove barriers and misconceptions surrounding implementation.

In addition, PCG emphasizes the need for intentional support that takes into consideration students' linguistic and cultural diversity. Districtwide and schoolwide practices based on these components provide a practitioner-focused, research-based, and federally recognized approach to improving academic/social emotional outcomes for all students, including students with disabilities and other students who have not achieved at or above expected levels of proficiency.

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The PCG team thanks the many individuals who contributed to this review of NVRHSD's special education services, including Mr. James Santana, Superintendent; Ms. Deborah Sarmir, Assistant Superintendent; Ms. Barbara Battaglia, Director of Special Education; Dr. Courtney Moran, Assistant Director of Special Education; Ms. Joannette Femia, Business Administrator; Ms. Colleen Briggs, Assistant Business Administrator; and Ms. Julie Bookstaver, Assistant Systems Support Operator. Their efforts were critical to the team's ability to obtain a broad and detailed understanding of NVRHSD so that we could present the best possible recommendations for improving special education and related services for the District's students. Our team greatly appreciated each of these individuals' commitment to ensuring that PCG received well-documented, thorough information from a range of stakeholders.

MEMBERS OF THE PCG TEAM

PCG's team members included:

- **Matthew Korobkin**, Project Director, Senior Advisor, and former Special Education Officer, Strategic Planning and Evaluation in the Office of the Secretary of Education, Delaware Department of Education
- **Katrina Schmitzer**, Senior Consultant and former Director of Special Education Data, Office of the State Superintendent, District of Columbia
- **Dr. Jennifer Meller**, Subject Matter Expert, Associate Manager, and former Director of Specialized Services for the School District of Philadelphia
- **Ajanta Shah**, Data Analyst and former school data supervisor in New Jersey schools
- **Matthew Scott**, Data Analyst and Project Support

Summary of Strengths and Opportunities for Improvement

The chart below summarizes the identified areas of strength and opportunities for improvement, which are further detailed in the final report presented to the NVRHSD Board of Education on October 15, 2018.

Section	Strengths	Opportunities for Improvement
Tiered Intervention Models	<p>I&RS process is used across both high schools to support struggling students.</p> <p>Through its 1:1 laptop initiative, the District is utilizing some core concepts of Universal Design for Learning.</p>	<p>District does not utilize a multi-tiered system of support (MTSS) or positive behavior intervention and support system (PBIS) for learners who are struggling academically, socially, or emotionally.</p> <p>Widespread belief in District that MTSS and PBIS are not appropriate intervention systems for high school students.</p> <p>I&RS protocols differ by building and interventions do not follow tiered system.</p> <p>Districtwide, staff refer to the process of having a student move through the I&RS as “IRST-ing” a student.</p> <p>Teachers are not trained in Universal Design for Learning.</p>
Instructional Supports and Services	<p>Committed special and general education teachers; early adopters to co-teaching and differentiation; several teachers and paraprofessionals have been with the District for 20+ years.</p> <p>Special education teachers well-versed in differentiating instruction.</p> <p>District administration and the Board have expressed an interest in possibly merging CP and CPE academic courses.</p> <p>Teachers are committed to inclusion and co-teaching.</p> <p>District Special Education Director meets with its seven feeder district Special Education Directors and has worked with them to address issues such IEP formatting consistency.</p>	<p>District offers two tracks of college prep courses – CP and CPE – of different GPA weights; differing views on rigor.</p> <p>Co-teaching pairs expressed concern about effective pairs being split; teachers share concerns about a lack of effective, proactive communication from the Special Education Department.</p> <p>Lack of continuity with District’s seven feeder districts on matters related to curriculum, assessment, and instruction for students with disabilities from NVRHSD’s seven feeder districts.</p> <p>General and Special Education teachers expressed concerns about maintaining effective co-teaching teams and effective communication ahead of the upcoming school year.</p>

	<p>District heavily leverages its 1:1 laptop initiative, serving as an “equalizer” for students with disabilities.</p> <p>District’s alternative programs are highly respected by parents and staff; programs are credited for placing students in less restrictive educational settings and keeping students in their home schools instead of an out-of-district placement.</p>	
<p>IEP Documentation and Service Delivery</p>	<p>General education and special education teachers indicated that students are almost always invited and typically attend IEP meetings with varying degrees of participation.</p> <p>Staff are committed to writing SMART, standards-based student IEP goals.</p> <p>CSTs participate in the IEP transition conversations of rising 9th graders as a means of ensuring consistency in transition planning and as a way to meeting students and families.</p>	<p>IEP teams do not utilize Person Centered Planning strategies.</p> <p>Teachers have received inconsistent training opportunities on PLAAFP writing.</p> <p>Transition conversations are not always inclusive of all IEP team members.</p> <p>Lack of consistent understanding around terms used to define progress in IEP progress reports.</p> <p>Lack of training and no written guidance on how to implement the accommodations outlined in students’ IEPs in the classroom.</p> <p>At times, lack of collaboration on IEP goal writing and progress reporting by co-teachers.</p> <p>District does not have a legally mandated SEPAC.</p> <p>Some parents have negative perception of special education in the District.</p>
<p>Section 504 Modifications and Accommodations</p>	<p>The District has a readopted Section 504 Manual; this manual includes clear operating practices as well as forms for 504 teams.</p>	<p>Negative “high bar” perception about 504 Accommodations by staff.</p>
<p>Organizational Structures</p>	<p>Superintendent has made special education a top districtwide priority.</p> <p>District has recently created (17-18) a Director of Special Projects and Innovation position – a component of this role is to</p>	<p>The Special Education Director presently reports to the Superintendent.</p> <p>Special education teachers officially report to the Special Education Director, possibly hindering integration in the subject-area they teach in.</p>

	<p>improve the manner that professional development is offered at NVRHSD.</p> <p>NVRHSD created an online, badge-based virtual professional development series available on the teacher-facing learning management system; the courses include: Dyslexia and Other Reading Disabilities; Dyslexia: Comprehension and Fluency; Multisensory Structured Literacy; Group Instruction Methodology; Apple Software Boot Camp; Transforming Instruction with Technology; Digital Formative Assessment; and Personalized Learning.</p> <p>Last December, through present Superintendent’s leadership, the Special Education Director presented an annual presentation to the Board of Education.</p>	<p>Special Education Department does not have a current organization chart.</p> <p>There is a need for ongoing, job-embedded professional development that is multi-modal; District presently does not leverage formal Professional Learning Communities.</p> <p>District does not have written guidance for CSTs and IEP teams on determining appropriate need for paraprofessional staff.</p> <p>District does not have a standard operating procedure manual for special education.</p> <p>Past inconsistent communication with the Board of Education on special education matters.</p>
<p>Budget</p>	<p>Over the past three years, District has kept its special education budget stable while expanding its alternative programs and reducing its out-of-district costs.</p>	<p>The district does not incorporate healthcare, PERS, FICA, dental, and eyecare contributions into its personnel costs for its special education budget.</p>

Summary of Recommendations and Actions

PCG saw ample evidence that NVRHSD has a solid foundation on which to build. The District has many notable strengths including its significant commitment to inclusive practices, its passionate and knowledgeable staff, and its willingness to undertake this review as part of a continuous improvement cycle.

The recommendations below, articulated in the final report presented to the NVRHSD Board of Education on October 15, 2018, address the components necessary to ensure that special education instruction/services identified for students are appropriate and meaningfully delivered, and that human and physical materials are available to provide identified instruction/services, expectations are clear, training is available, and NVRHSD/school leaders are accountable for their practices. These recommendations are mirrored within each section of this report; with action items included within each respective section.

When these issues are addressed, special education programming will be more appropriate and effective. Although components of the action steps can be implemented within a shorter timeframe, full-scale implementation of the recommendations may take three-to-five years.

1. Tiered Intervention Models

Recommendations	Actions
<p><i>Establish districtwide MTSS.</i></p>	<ul style="list-style-type: none"> ✓ Build on the New Jersey Tiered System of Support (NJTSS) and Intervention and Referral Services (I&RS) process and curricular frameworks to develop/implement a unified and clear structure of Multi-Tiered System of Supports (MTSS) for academic achievement, positive behavior, and social/emotional growth (including enrichment) for all students.¹¹ ✓ Establish a framework for the implementation of MTSS, including a written description and guidelines, for students performing below grade level standards.¹² ✓ Create a user-friendly and accessible MTSS manual for school teams and for parents to understand the MTSS process and to document procedures/practices relevant to the management/operation of MTSS in NVRHSD. Ensure a common understanding and buy-in around the District for the need for MTSS, why and how it is implemented, what desired targets are intended to meet, and what progress the District is making toward achieving the goals. ✓ Create a District-level MTSS leadership team, including the District's central leadership staff, school principals, the Director of Special Education, etc., and representatives from every educational unit (e.g., Title I, English learners, gifted, etc.). ✓ Establish standards for District-wide and school-based instructional leadership teams regarding the use of problem-solving and data-based

¹¹ This information includes components that are based on the Literacy Education for All, Results for the Nation Act (LEARN Act), H.R. 2272, which if passed would authorize state grants to improve birth through grade 12 literacy.

¹² Response to Intervention/Multi-tiered Systems of Support (RTI/MTSS) Guide developed by the RTI Committee of the Inclusion Action Group Project led by the New Jersey Coalition for Inclusive Education (NJCIE) (<http://njcie.org/wp-content/uploads/Part-1-NJ-RTI-MTSS-Guide-Introduction.pdf>).

	<p>decision making at all tiers to match instructional (academic and behavior) resources to need for supporting academic advancement and positive behavior; and supplement teams as needed to support teachers.</p> <ul style="list-style-type: none"> ✓ Consider the positive fiscal implications of enabling schools to retain special education staff to provide interventions for all students if the need for these teachers is reduced because of lower incidence rates for students with IEPs. Provide examples of how schools can use funds to support MTSS implementation. Consider the flexible use of allowable funds under Title I and Every Student Succeeds Act (ESSA) used to support MTSS.¹³ ✓ Develop an expedited two-to-three-year districtwide implementation plan. As part of this planning process, consider how each school will have access to sufficient evidence-based interventions to meet the needs of most students and access to additional interventions for students with additional needs.
<i>Fully leverage MTSS as the model by which I&RS is conducted.</i>	<ul style="list-style-type: none"> ✓ Within the implementation of the first recommendation, utilize MTSS as the structure by which I&RS interventions and supports are conducted.
<i>Discontinue use of the homegrown “IRST-ing” terminology.</i>	<ul style="list-style-type: none"> ✓ Discontinue use of the homegrown verb/adverb “IRST” as an action done to a student (e.g. “a student was IRST-ed,” “we are IRST-ing a student”). Use of this vernacular can be stigmatizing to struggling students who may benefit from interventions and supports derived through I&RS.
<i>Assure efficient, online I&RS documentation and FERPA compliance.</i>	<ul style="list-style-type: none"> ✓ Further study the district’s online, homegrown documentation system for I&RS. If it is not FERPA compliant, the district should further study online, cloud-based I&RS intervention management systems to assure FERPA compliance while also driving and maintaining districtwide documentation consistency.
<i>Embrace and provide consistent professional development on Universal Design for Learning.</i>	<ul style="list-style-type: none"> ✓ Provide clear guidance and training for all District teachers on the use and application of UDL practices so they can be used in the development of curriculum, instruction and assessment. When instruction is designed up front using UDL principles, individual learning needs are often mitigated, and this can help teachers be more open to and positive about the possibility that they can support a wide array of learners. Consider purposeful coupling this with technology tools the District already has at its fingertips through its 1:1 laptop initiative. With features like text to speech, translation, dictionary, thesaurus, highlighting and assistance with writing, the 1:1 laptop initiative can be instrumental in improving reading, writing and literacy

¹³ Implementing RTI Using Title I, Title III, and CEIS Funds; Implementing RTI Using Title I, Title III and CEIS Funds: Key Issues for Decision-makers at www.ed.gov/programs/titleiparta/rti.html.

	<p>outcomes for students. A greater understanding and implementation of UDL can make learning accessible to all students and can help close achievement gaps between students with disabilities and their non-disabled peers. Given the District already has a successful 1:1 laptop initiative, consistently applying the UDL framework to that initiative, as well as other learning initiatives, could yield strong outcomes for all learners.</p>
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2. Instructional Support and Services

Recommendations	Actions
<p><i>Elevate and Cultivate a Culture of Academic Optimism.</i></p>	<ul style="list-style-type: none"> ✓ Create an unrelenting expectation regarding instruction that clearly communicates to schools and the broader community that a key focus of the Special Education Department is to ensure that students with disabilities make significant progress, to the extent possible, in the general education curriculum, receive rigorous standards-aligned instruction, and experience the high quality delivery of interventions, differentiation, accommodations, modifications, and specifically designed instruction in every class – regardless of if it is Replacement and Special Programs, College Prep, College Prep Enriched, Honors, and/or Advanced Placement courses. Reinforce the non-negotiable expectation that “special education is a service, not a place.”
<p><i>Elevate Academic Rigor Through a Districtwide CP/CPE Merger.</i></p>	<ul style="list-style-type: none"> ✓ Move forward on the considered plan to merge CP and CPE courses, giving all CP courses the same GPA weight. The District administration has contemplated a three-year timeline to merge CP and CPE courses; PCG agrees with this timeline. ✓ In year one, establish a ‘CP and CPE Merger Taskforce,’ consisting of the Assistant Superintendent, the Director of Curriculum, the Director of Special Education, the Director of Special Projects and Innovation, general education teachers, special education teachers, parents, students, and other interested stakeholders. ✓ Create subcommittees that further study: (a) curriculum alignment between CP and CPE courses; (b) professional development; (c) meeting the needs of students with IEPs. These subcommittees can serve in a fact-finding capacity, reporting monthly to the Assistant Superintendent. ✓ Develop a report with recommendations at the end of year one on a best way to assure CP and CPE alignment, allowing for a successful merger. Include goals and benchmarks for years two and three before the merger. ✓ Convene the taskforce following the report on a regular basis to assess whether said goals and objectives are being met. ✓ In year one of the timeline, increase District professional development opportunities around curriculum and instruction between CP and CPE, with an equal focus on both special and general education, while leveraging information gained from the report in years two and three to fully merge CP and CPE by year three. ✓ Throughout the three-year timeline, conduct a districtwide annual survey to measure teachers’ instructional beliefs and practices within CP and CPE courses and analyze by school and role. Incorporate these findings in the work of the ‘CP and CPE Merger Taskforce.’

<p><i>Create and maintain effective co-teaching teams.</i></p>	<ul style="list-style-type: none"> ✓ Develop a documented plan to enable successful co-teaching teams, whenever possible, to remain together from year to year. Conduct a formal review of co-teaching teams annually to ascertain the success of the partnership and make changes to staffing pairs when needed. Share the results of this information with members of the District's executive team and building principals. When co-teaching teams have spent time to develop effective communication, have established a cohesive working partnership, and are seeing positive results in student achievement, administrators must seriously consider the investment in time and effort it takes to create an effective partnership and seek ways to maintain these teams.
<p><i>Ensure K-12 Continuity on Matters Related to Curriculum, Assessment, and Instruction for Students with Disabilities.</i></p>	<ul style="list-style-type: none"> ✓ Ensure continuity on collective resources and support to students, strengthen the collaboration between NVRHSD and the seven feeder school districts on matters related to the curriculum, assessment, and instruction for students with disabilities. Ensure that IEPs are constructed and formatted in a similar manner to ensure smoother transitions from 8th to 9th grade. Identify joint areas of work that the Special Education Departments in NVRHSD and the seven feeder districts have in common and leverage existing routine meetings for collaboration. In addition to curriculum, assessment, and instruction, collaboration can also occur on matters such as I&RS, MTSS, PBIS, PCAST, and other districtwide initiatives.
<p><i>Continue focusing on alternative program expansion.</i></p>	<ul style="list-style-type: none"> ✓ Continue focusing on alternative program expansion, leveraging partners such as Bergen County Region III to continue providing students with significant disabilities an education in the least restrictive environment that is possible. ✓ Further study the placement of a therapist in the Bridge Program and/or therapeutic intervention programming for high school students. Consider the cost/benefit analysis of adding an additional therapist versus the possible placement of ED students in more restrictive, costly out-of-district placements.
<p><i>Continue increasing the numbers of students to programs that are closer to home, when appropriate.</i></p>	<ul style="list-style-type: none"> ✓ With a focus on in-district alternative program expansion, continue increasing the numbers of students to programs that are closer to home, when appropriate.

3. IEP Documentation and Service Delivery

Recommendations	Actions
<i>Embrace Person-Centered Planning as a Fundamental Component of IEP meetings.</i>	<ul style="list-style-type: none"> ✓ Employ Person Centered strategies among all IEP teams, districtwide. Require professional development on Person Centered Planning. Develop a districtwide 'Person Centered Planning Team' who is tasked with leading the task of making sure that NVRHSD embraces Person Centered Planning as a core part of the District's identity.
<i>Ensure Consistent IEP PLAAPF Writing.</i>	<ul style="list-style-type: none"> ✓ Require consistent, mandatory, annual training on IEP PLAAPF writing for both general and special education teachers.
<i>Leverage all Team Members in Transition Discussions.</i>	<ul style="list-style-type: none"> ✓ Engage in professional development on IEP team engagement as it relates to the IEP process. Employ Person Centered Planning as a core component of all IEP transition conversations. Transition conversations should include participation from all team members.
<i>Continue Effective Use of Assistive Technology.</i>	<ul style="list-style-type: none"> ✓ Create district protocols around the request for assistive technology and qualified assistive technology consultants to provide professional development to IEP teams. Leverage qualified Assistive Technology Consultants through state special service organizations and other public or private entities.
<i>Implement Consistent Progress Monitoring.</i>	<ul style="list-style-type: none"> ✓ Require consistent, mandatory, annual training on IEP progress reporting. All team members must have a consistent understanding about the definitions within the IEP progress report. All teachers, especially co-teaching pairs, must be made aware of the purpose of these reports.
<i>Employ Alternative Routes for Dispute Resolution.</i>	<ul style="list-style-type: none"> ✓ When needed, leverage a third party facilitator to promote effective communication and assist the IEP team in developing a mutually agreeable IEP. Consider contacting NJDOE OSEP to submit a request for IEP facilitation. If the FIEP program is full; consider other possible third party facilitators.
<i>Immediately Create a SEPAC.</i>	<ul style="list-style-type: none"> ✓ Utilize recent guidance from NJDOE and SPAN on the creation of the SEPAC. If needed, seek technical assistance and support from SPAN or NJDOE OSEP. Leverage active community members who may want to be part of the SEPAC's formation. NVRHSD has an active community of families who frequently attend IEP meetings and attend open hearings about matters affecting students with disabilities.
<i>Establish a District Special Education Family Engagement Team.</i>	<ul style="list-style-type: none"> ✓ In addition to creating a SEPAC, establish a team of District- and school-level educators, staff members, family members, parents of students with disabilities, and community representatives for the planning process enables the District to benefit from the collective perspectives they bring. ✓ Create a vision statement for family engagement. Discuss core beliefs about family engagement and create a vision statement that expresses agreed-upon ideals. It can be shared with other stakeholders to build family engagement support across the District.

	<ul style="list-style-type: none">✓ Develop a plan to strengthen trusting relationships. Develop a plan that includes the following objectives (and includes others that NVRHSD identifies):<ul style="list-style-type: none">○ All staff learn about the assets and challenges among families in the school community through home visits. Teachers and staff listen without judgment and establish two-way communication channels with family members.○ Teachers across the District greet families and students before school or at beginning of class, in their native languages when possible.○ Teachers make regular phone calls home with positive messages and ask for feedback from families. ✓ Develop plan for strengthening connections to student learning. Develop a plan that includes the following objectives (and includes others that NVRHSD identifies):<ul style="list-style-type: none">○ District and school staff understand the barriers to their families in getting children to school and they engage in meaningful dialogue with families about community resources and the importance of attendance.○ Teachers hold class meetings to discuss with families how progress on English language acquisition is monitored and how families can support their English Learner student with a disability.○ Staff can engage in meaningful dialogue with families about how they can support their English Learner student and/or student with an IEP. ✓ Evaluate family engagement annually. Evaluate the implementation and impact of family engagement activities. Review the action plans for strengthening trusting relationships and strengthening connections to student learning with the family engagement committee.
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4. Section 504 Modifications and Accommodations

Recommendations	Actions
<i>Leverage the District's Readopted 504 Manual.</i>	✓ Continue to refine and update the NVRHSD 504 Manual annually.
<i>Engage in Districtwide Training on 504.</i>	✓ Train and create opportunities for all practitioners to understand and implement procedures delineated in the 504 Manual.
<i>Remove Negative Perceptions Around 504 Accommodations.</i>	✓ Remove the "high bar" perception by leveraging districtwide MTSS. During interviews, we heard reference to 504 teams sometimes "holding the line" on accommodations, with some teachers suggesting it may be easier for a student to get accommodations via an IEP. Such a practice should not be the case. Should the District embark on utilizing a multi-tiered system of support (MTSS) for its I&RS teams, the issue of "holding the line" should be mitigated by providing 504 teams with consistent, useful, and data-driven information. By engaging in consistent interventions, utilizing MTSS may provide 504 Teams with more information when they are working together to determine appropriate accommodations.
<i>Leverage I&RS and MTSS as a Means to Give 504 Teams Critical Information.</i>	✓ Leverage interventions that are part of a tiered system of support to provide useful information for 504 teams.
<i>Ensure Website has Current 504 Manual.</i>	✓ Ensure that the public can readily access this manual and these forms on an easy to locate section of the District's website. NVRHSD has made a concerted effort to have a comprehensive 504 manual and subsequent protocols. The District's practices are consistent with requirements from the US Department of Education Office of Civil Rights.

5. Organizational Structure

Recommendations	Actions
<i>Change Reporting Superintendent and Special Education Director Reporting Structure.</i>	<ul style="list-style-type: none"> ✓ Modify the present reporting structure to one where the Special Education Director reports to the Assistant Superintendent instead of the Superintendent. The work of special education ties hand-in-hand with the academic vision for the District. The Special Education Director needs to play an active role of creating and shepherding that vision. As such, it would be more appropriate for the special education director to report to the Assistant Superintendent and not the Superintendent.
<i>Further Study the Possibility of Having Special Education Teachers Report to both a Subject Supervisor and the Special Education Director.</i>	<ul style="list-style-type: none"> ✓ As a way to further purposefully integrate special education teachers into the subject-area they teach in, consider having special education teachers as 50/50, solid-line, direct-reports to both the Special Education Director and appropriate Subject Supervisors.
<i>Revise the Special Education Department Organization Chart at Least Annually</i>	<ul style="list-style-type: none"> ✓ Annually revise the special education organizational chart so that it reflects the present staffing structure.
<i>Provide Formalized, Written Guidance on Determining the Need for Paraprofessionals.</i>	<ul style="list-style-type: none"> ✓ Include specific factors for IEP teams to consider when determining the appropriateness of a paraprofessional as it relates to a child receiving a free and appropriate education in the least restrictive environment. Provide guidance in a manner that: (1) assists the IEP team to assign paraprofessionals when necessary to meet the individual student's unique special education needs, (2) precludes assignment of a paraprofessional based on limited information - for example, solely on the basis of a student's diagnosis or the needs of a teacher, and (3) seeks to ensure that service or support options (other than a paraprofessional) are also considered and utilized if they would address effectively a student's learning needs and offer additional advantages such as fostering greater independence.¹⁴ In addition, promote the development of plans to fade paraprofessional supports based on the individual needs of students, with a focus on student independence.
<i>Provide Consistent, Ongoing, Mandatory, Job-embedded</i>	<ul style="list-style-type: none"> ✓ Professional development serves as the basis for creating common understanding and shared experiences among all staff and provides a foundation upon which other systems-change supports can be

¹⁴ For additional guidance regarding the appropriate utilization and support of paraprofessionals, see Giangreco, M.F., Doyle, M.B., Suter, J.C., Constructively Responding to Requests for Paraprofessionals: We Keep Asking the Wrong Questions, Remedial and Special Education 33(6), October 2012, 362-373.

<p>Professional Development Opportunities.</p>	<p>anchored. Build upon recent momentum from recent online special education professional development. Create multiple avenues for training, including job embedded coaching (i.e. observing and providing feedback to peers as they are conducting lessons).</p> <ul style="list-style-type: none"> ✓ Design all professional development so that it is a coherent, relevant, and useful professional learning process that is measurable by indicators and provides professional learning and ongoing support to transfer that learning to practice. Ensure that all professional development designed and delivered elevates rigor for all students and is focused on best practices for implementing strategies to motivate learners, sets high expectations, provides necessary supports, addresses differentiation, and demonstrates mastery of learning. ✓ Continue to leverage the Northern Valley Curriculum Center for professional development; however, significantly ramp-up efforts for in-house professional development to provide the quality of quantity of professional development needed to merge CP and CPE courses – ensuring that all teachers understand how to <u>differentiate their instruction</u>. And for any of this to happen with fidelity, it is paramount that the District embark on the creation of special education standard operating procedures.
<p>Create and Cultivate Professional Learning Communities.</p>	<ul style="list-style-type: none"> ✓ In addition to the professional development days already allotted in the District's schedule, develop Professional Learning Communities (PLCs) that engage both general education and special education teachers. According to Hord, PLCs extend "...classroom practice into the community; bringing community personnel into the school to enhance the curriculum and learning tasks for students; or engaging students, teachers, and administrators simultaneously in learning."¹⁵ PLCs operate as communities of teachers – time is set aside in their schedules, often weekly, with a key focus on reflection of one's teaching practice and professional learning. PLCs allow for job-embedded coaching to occur and compliment both in person, online, and or blended professional development.
<p>Immediately Develop Special Education Department Standard Operating Practices.</p>	<ul style="list-style-type: none"> ✓ Develop a districtwide standard operating procedure manual. This manual typically is reflective of Board approved policies as well as state and federal code. It is usually intended as a resource for district staff, administration, and community stakeholders. It serves as the "how to" on decisions relating to a child's special education program, starting with identification; subsequent evaluation(s); classification; development and review of a child's IEP; educational placement of a child; annual IEP Meetings; and triennial reevaluations. It provides clear definitions about district practices. In addition, it is highly accessible, online and in a format that is easy to navigate.

¹⁵ Hord, Shirley M. (1997). "Professional learning communities: communities of continuous inquiry and improvement" (PDF). White paper issued by Southwest Educational Development Laboratory, Austin, TX and funded by the Office of Educational Research and Improvement, United States Department of Education.

	<ul style="list-style-type: none"> ✓ Provide public access to the manual by posting the document on the NVRHSD special education webpage and provide links to available online resources. ✓ Include criteria, procedures, and practices for each area relevant to the implementation of this report's recommendations. ✓ Implement Standard Operating Practices with Fidelity. Once written and published, annually refine and consolidate guidance where appropriate to provide clear expectations and directions to all and provide an institutionalized record to which all staff, including new teachers, can refer and be held accountable. ✓ Collaborate with teachers, CST members, principals, and SEAC members to consider information and resources that would be useful for each relevant group to include in the manual. ✓ In collaboration with local parent and advocacy groups, plan face-to-face training and online modules to provide parents an understanding of the information in the manual. If feasible, publish a modified document appropriate for parents and supplement it with one-page brochures to further access the information. Ensure training is accessible to all parents.
<p><i>Continue Communication with Board of Education on Special Education Matters.</i></p>	<ul style="list-style-type: none"> ✓ The Special Education Director should continue presenting, at least annually, to the Board of Education, on the district's special education programming. Keep the Board of Education abreast of the District's special education programming is important. Board members can serve as ambassadors to and cheerleaders for special education supports and services that are often complex for a lay person to understand.

6. Special Education Budget

Recommendations	Actions
<i>Celebrate Success of Increasing Program Bandwidth while Leveling Costs.</i>	<ul style="list-style-type: none"> ✓ The District has managed to expand its alternative programs, buy a building for one of those programs, and lower out-of-district costs while keeping expenses under the 2% cap – ensuring that the district’s annual operating expenses do not go above 2%.
<i>Ensure Special Education Budget and Transparency.</i>	<ul style="list-style-type: none"> ✓ The special education budgeting process is one that happens with the Special Education Director and the Business Administrator, and includes the approval of the Superintendent. It is important that the budgeting process be inclusive, and one that includes the HR office and school principals as a best practice. ✓ Include healthcare, PERS, FICA, dental, and eyecare in the special education budget when looking at personnel costs. Given the rising costs of health insurance and recent changes to paraprofessional health insurance benefits, it is especially important to include this as part of the Department’s budget.
<i>Continue Assessing Cost Drivers.</i>	<ul style="list-style-type: none"> ✓ Establish standards and protocols to monitor all high cost expenditures and costs that have been trending upward. ✓ Continue using standard reports that track trends in special education spending (e.g. membership enrollment count, personnel/staffing, allocations, transportation, out of district placements, litigation and IDEA grant management. Assure these reports are accessible and are frequently (at least quarterly) reviewed by the Special Education Director. ✓ Continue monitoring alternative programing cost increases (Bridge Program, Summit House) and out of district cost decreases.



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