

# **Special Education Study Rochester School Department Rochester, NH**

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## Acknowledgments

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# I. Introduction

Educational leaders identify special education throughout the nation as an area that deserves scrutiny today with respect to its costs and benefits educationally and economically as well as any district's program strengths and needs. Much research has been done on student identification practices, the effects of labeling students, best instructional practices and academic costs/benefits of special education programming. We know that extensive funding and energy is invested into staffing, programming, administering and defending special education.

We know that the most significant challenge in education for all students is to provide quality and equitable instruction at reasonable costs. We know that local, state and national data can help us bring our perceptions of work/case load, student success, and other aspects of special education programming into a best practices model at reasonable costs to taxpayers and increased benefits for our students.

It is laudatory that today the Rochester School Department is asking itself in fact to what degree it is providing the highest quality and equitable instruction for special education students at reasonable costs and if not, asking American Educational Consultants how to do so – how to increase its special education program's effectiveness, increase student performance and how to control its special education costs.

We have been asked to:

1. Review all of the programs and personnel associated with the delivery of special students' services with the focus on the most efficient and effective delivery model for students.
2. Assess the needs of staff for professional development, training and supervision.
3. Provide a detailed analysis of district programming and services for all special education students.
4. Provide a cost-benefit analysis of the cost of special education programs in the Rochester School District.
5. Consider classroom space in program development, reductions or improvements that impact the use of classroom space.

In addition, responses to the following questions are included in the final report:

1. Is the delivery model effective in each school?
2. Is the delivery model cost effective?
3. What model might reduce cost and/or space needs in the district?
4. If it is more cost effective to provide services for students within the district instead of out of the district, how do space concerns relate to this issue?
5. Can the district reduce the number of paraprofessionals providing direct or indirect services?

With respect to district culture, school climate and administration:

1. Are the needs of students being met more efficiently and effectively in certain schools or neighborhoods?
2. How much does the current management system influence special education identification rates or out-of-district placements?
  - a. Compare cost and service delivery patterns for each disability in each individual school in the district.
  - b. Out-of-district placement rates by grade levels
  - c. Track student performance by disability
  - d. Track student completion rate by disability

With respect to disability specifics and comparisons:

1. What is the distribution of students with disabilities, by type of placement?
2. How does the program compare to the state and national rates, types, and delivery models? What is the percentage of students with disabilities moving into the district?
  - a. The number of students with disabilities
  - b. The number of special education and related services providers
  - c. The number of students with disabilities receiving related services by type of service
  - d. Percentage of students mainstreamed

With respect to service delivery and programs:

1. Are there more para-educators than required?
2. Is it more cost effective to have more teachers, fewer aides?
3. How do the district's service delivery and programs at every level compare with best practices?
4. What successes and opportunities for improvement exist?

With respect to outcomes, school completion and discipline:

1. How does the school completion rate for special education students compare to the regular education students?
2. How does it compare by disability?
3. How are disciplinary actions and behavior handled by individual schools?
4. Is there a model that is working more effectively than other models for behaviors and disciplinary action?
5. How does the staffing level relate to student disability, performance and needs?

6. Discipline of students with disabilities compared to the general school population and analyzed by individual school?
7. State assessment performance of student with disabilities?
8. Student proficiency in math and reading?
9. Overall identification rate compared to state and national rates?

With respect to costs and funding:

1. How does the district's funding of special education compare to the state and national funding?
2. Cost per pupil broken down by disability and level of service?
3. Compare the use of IDEA funds to district funds.
4. Compare costs per special education student per program (out-of-district, self-contained, resource room, individual aide, or mainstreamed).
5. Compare cost of out-of-district programs, and analyze if additional space is needed in the district.

## II. Executive Summary

Rochester Schools and Michael Hopkins, Superintendent, should be highly commended for requesting this study of an important piece of its service to the community and its children. We all know that students in need of special instructional attention are required by law to receive appropriate interventions. Identifying program strengths and opportunities for improvements, the opportunities to control costs, and opportunities to increase student achievement, are all highly professional objectives for any school district.

With respect to special needs students, given the data and anecdotal evidence we gathered, the findings we developed, and the recommendations we make in this report, Rochester Schools should be VERY proud of the quality of its teaching, administrative and support staff as they relate to special education instruction.

Among the strengths we identify in this report, the most significant are:

1. **The Rochester community should be very proud** that its school district is led by highly qualified administrators and its students taught by very professional educators, supported by an excellent team of caring related service professionals and a cadre of paraprofessional aides. All the interviews and visits we conducted in the district indicated that the people employed by the school district care about how they serve students and want to do everything within their power to help every student reach his or her potential.
2. **Rochester Schools provides professional support to its staff** in order to provide proper instruction of special education students in compliance with best practices, federal and state regulations, and in the best interests of students.
3. **Data indicates that many facets of special education placements, instruction and costs are within proper parameters based on best practice standards and state and national norms.**
4. **The district's alternative high school is a significant intervention for at risk students in Rochester and appears to be succeeding** in providing alternate instruction that encourages and allows students to graduate from high school who might not otherwise do so. This same intervention is appropriately available for students with special needs.
5. Where we recommend changes in programming for students with disabilities in this report, **we are confident that Rochester Schools has the personnel to implement these improvements** such that special education and regular education students will be more successful in reaching their full academic potential.

Among the opportunities for improvement, opportunities to control costs, and opportunities to increase student achievement that we identify in this report, the most significant are:

1. **Adjust special education and related services staffing** to levels indicated in the report for the purposes of: providing proper access to instruction and appropriate least restrictive services to identified special education students; insuring reasonable and appropriate costs to taxpayers for the education of all students; improving student achievement outcomes for special education as reported on standardized achievement tests administered to all students. Our staffing recommendations are estimated to encourage IEP teams to focus more on least restrictive environment resulting in **less pullout** into special, self-contained, and individualized but unnecessary services, and **more time in regular instructional settings**, as required by law; **save the district over \$1.1 million annually** in staffing costs by assigning staff best practice case loads; and **increase student achievement** by exposing more special education students to more core curriculum as a result of more appropriate individualized pullout special instruction and related services. We also recommend the addition of a social worker/administrator to supervise the myriad of family related issues that affect all students including special education students' ability to focus as they should on instruction.
2. **Reduce significantly the number of special education students served outside the district to only low-incidence, IEP-appropriate outside placements.** We recommend analyzing the IEPs of the students currently placed outside the district for appropriateness. Anecdotal evidence estimates were that 30 of the 34 students placed outside the district would qualify for placement in the district by adding unit(s) of instruction for those students. This single act would again **bring students into compliance with special education law, save the district \$925,000, and bring regular curricular expectations more closely to the instruction of these students.** Other outside placements could be analyzed under this same model for additional possible compliance, cost, and student achievement advantages.
3. **The district should coordinate with each school principal the development of an individualized building improvement plan to insure special students are receiving proper instruction in a least restrictive environment.** This plan could include the need for additional professional development as well as the need for some teachers to get "highly qualified" status in specific academic areas. Data indicates a few schools in the district need to adjust how they approach special education as a whole while others who are more closely in compliance with special education expectations would also be served, albeit to varying degrees, by taking the time to analyze how special education programming was providing its students proper access to instruction without unnecessarily removing individual students from exposure to core curriculum in regular classrooms. For example,

we believe middle school leadership seems quite prepared to address the gap in special services that exists for students at that level currently placed in self-contained units that would be more appropriately served in a more flexible and student-individualized resource room model. Working with regular and special education staff on co-teaching and differentiated instruction will take some focus and district support. In another example, McClelland Elementary leadership appears to understand the goals of the special education program in its jurisdiction but may need support and assistance in developing an implementation plan to reach those goals. Although it's a good start, there is more to changing a school's culture regarding developing and implementing proper IEPs and mainstreaming special education students appropriately than merely willing and able leadership.

4. **Maple Street Elementary** is a dilemma for special education services because of the small student population housed in it, a larger percentage than appropriate currently being students with disabilities. The district should make a decision either to add significant numbers of students and staff to the building to provide proper regular, special and related services to all students (a magnet school concept might be considered here), or close that facility and integrate those students into good and proper educational opportunities and facilities at other elementary building(s).
5. **Age appropriate orientation day/days for entering students** at all grades and placing a social worker/administrator in charge of supervising this program and supervising needy student intake and transition processes. This type of program will set clear expectations for students and can be used to help assess specific student needs through interaction with an insightful adult.
6. **Regarding the use of restraint techniques and out-of-school suspensions imposed on special education students**, all staff should recognize that: (a) the district has implemented policy changes and provided staff development to support staff in handling inappropriate student behavior, (b) the district has expectations that students, including special education students, behave properly at all times, and (c) staff are expected to provide proper supervision such that the likelihood of inappropriate student behavior is diminished. With that in mind, administrators and special education staff should use their knowledge of de-escalation techniques and tiered interventions that include only the most necessary use of out-of-school suspension. Restraint and other punitive measures are not supported as appropriate, research-based interventions. The district should continue efforts to employ proactive behavior supports that teach appropriate behaviors.
7. **Pre-school programming** should be analyzed for:
  - a. size of the typical peer population necessary to create a proper environment for those with disabilities to be in line with federal targets regarding preschool least restrictive environment;

- b. current practices that appear to over-identify students as having disabilities;
  - c. overstaffing at the detriment of other elementary programming; and
  - d. more flexibility in service delivery so that IEP teams may increase or decrease services to address specific needs of students.
- 8. **Develop with other area school districts a collaborative, cooperative program for middle and low incidence disabilities** such that programming can be brought into the public sector, which is designed to be less expensive and equally if not more successful academically. The district should focus this programming on students at the middle and high school level with behavioral and emotional needs, increasing local options for students with multiple disabilities.
- 9. **It is recommended that the district develop a strategic plan for full implementation of planned improvements.** The district should adopt a template for annual data review and analysis based on key indicators such as LRE, student achievement data, staffing ratios and annual expenses with clearly defined annual targets. Utilize data from a single point in time, i.e. December child count, year-end expenses and annual achievement data, as the single source of information for regularly scheduled analyses.
- 10. **Evaluate professional development** for special education personnel as to its effectiveness. Several recommendations made in this report require personnel to think differently about their services to students. This typically requires some opportunity to “defrost, change, re-freeze” in terms of daily practices, IEP expectations, and appropriate LRE service plans.

**With respect to costs, the following recommendations will annually save Rochester Schools over \$2 million** of local, state and federal taxpayer and grant funds and provide more effective instructional and support services to its special and regular education community.

- 1. Bring into the district all eligible students with disabilities currently placed outside the district except where indeed low incidence defined disabilities exist. This action will reduce the current \$2,035,000 expended for these 34 students annually down to \$1,110,000 **saving the district \$925,000** every year in instructional costs and transportation expenses. Included in this calculation is that fact that bringing all but district-placed low-incidence students to in-district programming will require additional staff positions which at full implementation would include three special education instructors, six paraprofessionals, one FTE of related services/counselor, some text/materials needs, and will result in a reduction of catastrophic funding reimbursements and of course will retain the expenses for the small number of low incidence students with appropriate out-of-district placements. This represents annual savings at full implementation.

2. Adjust staffing to appropriate levels in pre-school through high school to standard case load management and support assignments insuring services included in IEPs are provided within generally accepted student/staff workload ratios **saving the district \$1,150,000 annually** by:
  - i. maintaining current levels of administrative/supervisory staff, including school psychologists, academic assessors, court liaison, central office and building administrators assigned special education supervisory roles as deemed necessary by the district
  - ii. reducing one out of district liaison (**saving \$70,000**)
  - iii. maintaining current level of Occupational Therapist staffing
  - iv. reducing five Speech Therapists (**saving \$350,000**)\*
  - v. increasing current level of Physical Therapist staffing or adding a PTA by one position (**additional cost of \$70,000**, less if a PTA is employed)
  - vi. reducing Adaptive Physical Education Instructors to .5 FTE (**saving \$105,000**)\*
  - vii. maintaining current levels of counselors, nurse, ASL interpreters, job coaches and district guidance counselors as deemed necessary by the district (but consider transferring one FTE of counselor or other appropriate support person into social work/administrative role recommended in this report to supervise age-appropriate student orientation program for all incoming students at every grade level)
  - viii. reducing four special education instructors as specified in Fig. 5.5. (**saving \$280,000**)
  - ix. reducing 24 paraprofessionals as specified in Fig. 5.5 (**saving \$415,000**).

\* With respect to staffing recommendations for speech therapists and adaptive physical education instructors, it is likely that more instruction is being provided than indicated as necessary in current IEPs. Here we recommend reductions in positions. However, there may be some necessary instruction that for some reason has not been noted in a student's IEP. Critical administrative supervision of the IEP team recommendations regarding related services should occur such that special students receive neither under nor over the amount of service required for them to access proper instruction. IEP teams should continue to monitor student progress within the general education curriculum and provide services that are necessary to support student growth. After those IEP processes are completed properly, then and only then can staffing needs for students with disabilities properly be determined to be different than these recommendations.

### III. Methodology

During the fall of 2010, Rochester Schools Department released a Request for Proposals that outlined very clearly what it wanted in a study of its special education programming. American Educational Consultants developed a proposal, submitted it and was approved by Rochester to supply this service. The timeline included assumptions, preparation, action steps, and the expectation that American Educational Consultants would submit a timely report with clear and specific, feasible and practical, program recommendations that would maximize the educational opportunities and success for special education students in Rochester Schools while containing and/or reducing financial and other costs.

An initial site visit was conducted on November 30, 2010, by American Educational Consultants to gather data and conduct interviews of key leaders and representatives of various staff constituencies. Additional data was gathered subsequent to the visit by phone, digital exchanges of information and one additional day of interviews conducted on-site by American Educational Consultants on December 9, 2010. District October 1 count data was used as the primary source of all student data. Secondary sources are noted in references at the end of this document. Information was organized onto a series of charts which were then used to create graphical representation of all buildings grouped by grade level. At the same time data was being gathered by American Educational Consultants from state and national sources for comparative purposes.

The primary source of district financial data were from its own cost reports, from which American Educational Consultants has provided general costs per program. American Educational Consultants is confident that cost information is valid for the purposes of comparing costs across programs.

The data and information was charted and trends/significant differences identified by American Educational Consultants, after which findings were determined, recommendations were developed and summary conclusions were drawn. The final report was brought to the superintendent and other key leaders for a feasibility analysis on January 21, 2011.

The final report was presented to the district on January 31, 2011. Questions or comments regarding the veracity of the information contained in this report can be sent to American Educational Consultants, PO Box 221174, Beachwood, OH 44124.

## IV. District Successes

### A. District culture, school climate and administration

- i. **Rochester has a well developed special education program** that considers student educational needs, procedural requirements, and financial considerations of programming. Special education programming is generally organized on the building level under the guidance of central office administration, and four coordinators at the preschool, elementary, middle school and high school levels. The district provides a full range of related service staff to help support student needs as summarized in table 1.1.
- ii. **Leadership appear very informed, purposeful and of the highest quality** as it relates to the district's commitment to provide optimum special education programming for students in the most efficient and effective manner possible.
- iii. Administrators and staff verbalize their desires to improve special student academic achievement at the same time as being mindful of, and controlling, costs to taxpayers.
- iv. **Response to intervention programming** appears to be implemented reasonably effectively, attending to students' learning needs without unnecessary in/out special education identification processes.
- v. **Elementary reading and math programs** in particular focus on needy students to the degree that general education interventions are available and aimed at reducing special education identification rates closer to norm-predicted levels.
- vi. **Middle school programming** provides a wider array of interventions now than in the past, allowing for more students in regular education settings, thus exposure to more core curriculum.
- vii. **High school** provides programming for identified special education students who have completed regular high school requirements yet continue to require services. High school special education staff members are involved in professional learning communities.
- viii. Although this project did not include visiting all the district's schools, among the schools visited, observation of some found a very positive, involved and informed principal and evidence of **effective special education, including PBIS, programming.**
- ix. **District staff members have been trained in CPI and de-escalation techniques**, another indication of the commitment the district has in keeping staff qualified to handle special students' needs.
- x. **Management team meetings** include the elementary special education supervisor, which provides district focus on and input from special education staff.
- xi. **District staff members are consistent** in providing a reasonably

clear definition of Response to Intervention programming. Additionally, they consistently identify that student behavioral and mental health concerns are a significant challenge for the district. The district is also faced with the challenge of a transient population of families in several of the school buildings and believes this may be as high as 30% annually within some of the buildings. District staff members remain committed to providing quality education to all students despite these challenges.

- xii. Anecdotal references to Rochester having an **excellent reputation for educating students with autism** were evident. Understanding that providing these students access to quality instruction can be challenging, this is good for a district.
- xiii. **Due process claims have been minimal.** Time, energy and dollars wasted on formal mediation procedures also have been kept to a minimum. Typically this is the case when school district personnel handle special students' needs efficiently and effectively.
- xiv. **Centralized student registration** appears to take advantage of appropriate funding sources through efficient coding practices.
- xv. The **alternative high school** appears to meet a significant need for at-risk students, some of which are identified special education students, by reducing the rate of student dropout and providing timely and alternatively presented instruction.
- xvi. **Spaulding High School** has reduced its reliance on self-contained special education classroom settings. It is known that resource rooms provide a broader continuum of services for identified special education students. Block scheduling provides opportunities for team teaching between special and regular educators to address instructional needs of students with disabilities.
- xvii. Anecdotal evidence was presented that the special education teachers, paraprofessionals, and related service staff as a whole are **quality educators**.
- xviii. Anecdotal evidence was provided demonstrating that special education teachers, paraprofessionals, and related service staff are **provided quality training**, as needed, by the district
- xix. Data analyzed for service delivery patterns, since Rochester is responsible for providing services to all students, indicates many areas where an **expected distribution of students** exist. Exceptions to this are noted in the *Recommendations* section of this report.
- xx. Data was provided that demonstrates the district staff's capability and expertise for **identifying and tracking special students**, their academic achievement, and the costs associated with their education.
- xxi. During our interviews with key leaders and other staff, we were

very impressed with the **knowledge, skills and attitudes** both generally as professionals and specifically towards Rochester Schools and the commitment to providing all students access to quality instruction. Staff we spoke with appeared to have the district's common vision regarding special students. Even when a program they represented was outside that common vision for some reason, staff members were clear about the reasons but also their understanding that the program likely needed to be changed to bring it back into the **common vision of special education**. Staff were equally aware that special education is specific to the student, providing that student access to quality instruction in the least restrictive alternative in or closest to the student's home school and regular education classroom setting.

- xxii. Staff assigned the task of providing the wide variety of data necessary for this report understood the questions, had or quickly produced the data requested, and were **most cooperative** throughout the process.
- xxiii. **Teacher student ratios are fairly similar between elementary buildings** but there are fairly significant differences in ratio of paraprofessionals to students across the buildings.
- xxiv. **Rochester has obviously worked hard and invested considerable resources to develop a very strong student support system.** Staff across buildings are well informed of procedural requirements. Staff are equally informed of a range of educational supports and interventions to help students learn.
- xxv. Most buildings incorporate a building wide **Positive Behavior Support System** which was evident to us both through staff interviews and direct observation.

B. Disability specifics and comparisons

- i. Data demonstrates **many areas where Rochester students fall within normed parameters** in both placement and performance when matched to geographically comparable school districts, as well as state and national data. Exceptions are noted in the *Recommendations* section of this report.
- ii. **The number of Rochester students with autism is not significantly different from state and national expectations.**
- iii. Many staffing areas both in buildings and functions fall within normed parameters when matched to geographically comparable school districts, as well as state and national data. Exceptions are noted in the *Recommendations* section of this report.
- iv. The percentage of students with various disabilities across all elementary schools demonstrates what would appear to be **fairly consistent identification practices** across buildings, taking into account the small numbers of children in some buildings and varying grade levels.

C. Service delivery and programs

- i. **Related services staff** reported a high level of professional collaboration existed among them on behalf of students with special needs.
- ii. **Students with low-incidence needs** such as those with hearing and vision impairments are properly served by the district.
- iii. **District staff members are strongly committed to RTI and efforts to support students' academic success.** The district is able to articulate specific research based interventions available for students. Staff members who were interviewed were aware of programming and needs. Extensive staff training has been available on various interventions.
- iv. **The district provides a wide range of service delivery options at the high school level** to help ensure that opportunities are available for students. Options include electronic learning centers, vocational opportunities, on-line credit recovery and early entrance into military schools. Options are also available to assist students with more significant needs to transition to employment or adult programming.

D. Outcomes, school completion and discipline

- i. **The district has identified improved student discipline** as a target goal, recognizing that handling identified students with behavioral and emotional disabilities as a population in need of particular attention, along with the general student population, is of particular import to this effort.
- ii. **Alternative high school programming has provided appropriate intervention** and is demonstrating successful

outcomes for a number of special education as well as general education students who likely would have been dropouts or school failures.

- iii. **Rochester is commended for setting a 90% reading goal.** To this end, district leadership are all reading Annual Growth for All Students, Catch-up Growth for those who are Behind; Fielding, Kerr & Rosier. This effort forms a common vision which is communicated to staff and families and sets the focus for the work of the schools.
- iv. The **high school** has recently adopted several new programs in an effort to improve student outcomes. Evidence is found in the comprehensive *Rochester School District Focus Monitoring Summary Report 2009-2010*. The results of these efforts are emerging and the district is applauded for its creative approach to providing quality programs designed to meet the needs of all students.
- v. Rochester has provided a clearly articulated list of interventions and a protocol to **ensure that children receive appropriate interventions** designed to meet individual needs.
- vi. **Rochester's special education district report card** provides evidence that Rochester is showing progress on federal targets for reading proficiency and math proficiency for students with disabilities over the last several years.

#### E. Costs and funding

- i. **Funding and reimbursements appear to be processed and monitored reasonably.** Note some suggestions to improve are in the *Recommendations* section of this report.
- ii. Many staff members who are in administrative or quasi-administrative roles are **aware of funding and reimbursement issues** and consider these appropriately when making decisions about programming.
- iii. Rochester has developed **a mechanism to take advantage of reimbursements** through governmental Medicaid and Catastrophic Cost programs to help provide revenue to support programming. District administration has made tremendous effort to maximize reimbursements for services wherever possible

## V. Recommendations

### A. District culture, school climate and administration

- i. **Reassign special education coordinators to ease building level transition issues.** Coordinators should be assigned to grades such as 8-12; 5-7; 1-4; PreK-K. This plan provides teachers, students with disabilities and parents an easier transition through the typical elementary, middle and high school building transitions.
- ii. **Convert the current *outside placement team* into a district behavior monitor/advisory team to oversee district data targets and methods regarding improved student behavior goals.** The current purpose of the team is to monitor outside placements and indeed the team has done that task. However, the result is a very inefficient, expensive and inappropriate gatekeeper concept for out-placement of students who ought to be served for all those reasons, efficiency, cost and appropriateness, within the district. By law IEP teams, not outside placement teams, make placement decisions about students. Yet this team or one similarly constituted could be tasked with monitoring and advising the district's professional staff regarding progress towards student behavior improvement goals.
- iii. Because students with disabilities are included to a larger degree than would be typically expected at any one high school, **Bud Carlson School has to be marketed** to the rest of the staff and the public for its ability and success in providing quality alternatives for students. Currently we found a gap between the perceptions of administrators and those of other staff regarding the purpose and effectiveness of this alternative high school setting. In addition, the district should ask itself whether Bud Carlson should be open to seventh and eighth grade students as well, for those who demonstrate the need for an alternative to traditional instruction.
- iv. **A fairly significant number of regular education staff members are paid under special education budget categories.** As such, these staff impact special education cost accounting and staff-student ratios. The district is encouraged to review recommendations as discussed in Section E. of this report to ensure proper and efficient accounting. (Figure 1.1)
- v. **Maple Street School** has more students with disabilities than recommended to provide balance in inclusive education. While there are advantages to the neighborhood school concept, Rochester should consider ways to balance the population of students to help improve outcomes for all students. Drawing more students to the building or closing it appear to be among the best choices.
- vi. Consider reconfiguring **the preschool building** to allow for closer

proximity of the autism class with the other preschools classes; alternately consider moving the preschool program into the same building as the area Head Start such that students can have joint enrollments and a richer preschool experience could have a similar improved educational result. This will also support efforts to expand options for preschool in order that more children are served in a more typical preschool setting. It is anticipated that this will soon be a federal requirement for preschool.

- vii. **Support the middle school principal's readiness to implement changes in special education such that legal requirements, student needs, program expectations, funding, staffing, IEP processes, and district program goals are fully met. Out-placement of students with disabilities who misbehave should be reduced to only the extreme, low-incidence disabilities. In addition, this will help the special education staff develop** an appropriate program at middle school with range of services with full continuum that flows PreK-12 purposefully to enhance student achievement gains. The current disconnect from elementary resource room programming to middle school self-contained unit to high school alternatives and the out-placement issues should be analyzed and adjusted for legal compliance, educational and fiscal reasons.
- viii. Recognizing that up to 1/3 of enrolling students register immediately before or at the opening of school in the fall and up to 1/2 of enrolling move-ins do the same, the district should design **incentives for early registration of students to allow for more efficient district planning.** For instance, an ice cream social school "registration celebration" for incoming kindergarten and first graders planning to enter in the fall could be rotated among the elementary schools in the spring and fall and might encourage earlier enrollment than currently occurs. Or a pizza party in the middle of July for students who are registered up to that date could be held. In addition, having screening activities that are designed as fun activities and conducting a parent orientation in the school's behavioral expectations so parents and incoming students can *practice* those proper behaviors at home might help the district. This screening might also provide for an identification of students who might need extra time at a district kindergarten *day camp* that could be conducted during the week before school starts, possibly having it one day for students and rotating it through five different elementary buildings around the community. The cost of this program might be much less than the costs associated with disruptive behaviors into the school year.
- ix. **Supervision of IEP service plans is an important administrative function.** Special education staff are presumed to be quality instructors. However, in large part they determine the

amount of time needed by a student for their own services, in classrooms and in therapy sessions, thus creating natural interest in providing students more pullout services if they have time to provide those services. This is natural, yet often does just the opposite of their intent because while they pull the students out for special attention they inadvertently decrease the amount of time that student is exposed to regular curriculum, the consequence of which is less general knowledge and skills learned by the student.

**We note significant services for students with disabilities across all buildings which may be counterproductive** in pulling students away from core instruction and disrupting the flow of the general education classroom. For this reason we recommend that administrators provide the necessary balance to these natural tendencies on the part of quality special education staff.

- x. **Communicating properly to parents of students with disabilities should be purposeful.** Parents of students with disabilities have rights that sometimes are unknown to them because administrators or the students' case managers aren't sure what to tell them or not tell them. Due process rights, mileage reimbursement opportunities, and other process allowances should be explained thoughtfully, not just provided perfunctorily or ignored as is commonly the case in school districts. We found **no** evidence of deception in Rochester but do want to note this item for consideration.
- xi. **Having a good reputation for providing quality instruction for students with autism is admirable.** But insuring that taxpayers are not providing more than necessary programming is also important. Rochester should find the balance by continuing to provide quality services but also **communicating** to the public how thorough a process is used to identify students with disabilities.
- xii. **We recommend that specific charts be created and updated regularly for the purpose of district and building decision-making.** Informed decisions are more easily made and more credible to all the constituencies when everyone is watching the same data. We suggest the following charts for that purpose:
  - 1. 1.3: Percentage of Students with Disabilities; Rochester should review evaluation and service delivery practices where numbers exceed 16% of the student population and 2% of ADM for preschool.
  - 2. 3.12-3:15: Staff to Student Ratio; Rochester should monitor teacher/student ratio by building and related service provider to keep ratios as close to maximum allowed by law while maintaining a range of services in all buildings.
  - 3. 4.1 & 4.4: Reading and Math achievement by building;

Student Achievement is crucial and ideally the district should track progress by child and by grade to judge effective instructional practices.

4. 5.1: Rochester should monitor the percent of total budget spent on special education services. Every attempt should be made to maintain and ideally reduce special education costs to better balance the needs of the district.
  5. 5.4 and 5.11: Rochester should monitor costs by building and related service as a way to track overall costs and to help provide a "screening" measure to assist with requesting reimbursement for all high cost children who qualify.
- xiii. **Work/caseloads among various special education staff should be leveled such that services to students with disabilities are equally appropriate in all buildings and at all grade levels.** Equitable assignment of IEP services to staff should be analyzed and at least annually re-evaluated as students and programs shift into and out of each building.

B. Disability specifics and comparisons

- i. **Rochester should review identification practices** at the elementary and middle school level to gain a better understanding of why there is such a significant difference between students with specific learning disabilities and speech impairments at these 2 levels. (Figure 2.3)
- ii. Rochester has a **higher than expected identification rate in preschool**. Rochester should review current identification and service delivery practices for preschool (Figure 2.1 and 2.2. See also section D for related recommendations).
- iii. **Staffing at buildings should be reevaluated immediately and then regularly** to ensure it matches special students' instructional needs and comports to state and national student/staff ratios as noted in data charts in Appendix A.
- iv. **It is strongly recommended that Rochester base IEP service plans and instructional goals on student achievement data, instructional gaps identified by the data, and realistic instructional goals, the results of which are measured to demonstrate proper or lack of proper annual growth of each student.** Every IEP goal and service plan should be monitored for LRE and level of service compliance by competent, trained professional special education supervisors. This supervision could include principals and other administrators but should not be solely relied upon to be properly accomplished using teachers, paraprofessionals or related service staff.

C. Service delivery and programs

- i. **Data indicates that students with speech/language impairments are removed from the general education environment more than would be expected** (Figure 3.2 & 3.4). Rochester is encouraged to review eligibility and service delivery for students with speech/language impairments and SLD to ensure that students are properly identified and served at the elementary and middle school levels especially.
- ii. **Data indicates that student placements do not provide a full range of service delivery options to students at the middle school level.** (i.e., there are no students participating in general education classes between 40-79% of the school day). However, anecdotal evidence provided information that some special education students are provided general education interventions not included on their IEPs, thus not reflected in the data. It is strongly recommended that Rochester develop and implement a resource room model that provides the opportunity for students to receive varying amounts of time in the general education environment based upon student need. Proper student and teacher support should be made available to insure success. (Figures 3.3, 3.4, comparison districts)
- iii. **Nancy Loud Elementary has a unique opportunity** as the principal has BCBA (Board Certified Behavior Consultant) certification. Rochester might wish to use this opportunity to open a transition class at Nancy Loud for students with severe needs moving from preschool so they can have a structured integrated program and continue to provide a high level of support for up to grades K-2 then move back to neighborhood schools.
- iv. **The district should consider employing a social worker/administrator** in a supervisory role, to provide development and implementation of a student intake and orientation program, design effective intervention monitoring and guidance for students/families in need of social services, and assist in providing staff development such that teachers, counselors and administrators might be able to prevent and act in a manner that improves the education of all students.
- v. **The district should consider developing, with other area school districts, a collaborative, cooperative program for middle and low incidence disabilities** such that programming can be brought into the public sector, which is designed to be less expensive and equally if not more successful academically.
- vi. **Speech pathologists** should be encouraged to continue efforts to go beyond articulation and into areas such as oral and written language, automaticity and vocabulary enrichment such that they are reinforcing core curriculum. SLPs should research the

- important link on language development to reading acquisition to ensure best practice in assisting students with reading needs.
- vii. A common hurdle at middle school level is the need for special education resource room teachers to become **HQT-status teachers** in specific areas of core curricular instructional support. The district should offer opportunities for those teachers to become *highly qualified* in order that the resource room concept comports with federal requirements.
  - viii. As a part of each building's special education program improvement plan, **administrators should insure that students are in the least restrictive environment** based on IEPs that reflect student individual needs as opposed to fitting students into general education interventions. We know that each student's service plan should be derived from the student's individual evaluation and corresponding data-driven needs. While Rochester is commended for having a district level evaluation team that can maintain similar identification practices across buildings, this may work to reduce staff awareness of student needs. Evaluation staff should work closely with IEP teams to understand student needs and develop individually appropriate programs. The buildings improvement plan should address how to ensure that happening along with how RTI supports the balancing of specialized instruction with general education interventions.
  - ix. Data shows that a number of students are identified as students with speech/language impairments and also receive physical therapy. While this may be acceptable and appropriate, Rochester should **review evaluation practice** to ensure that students are appropriately evaluated and categorized to best meet their specific needs.
  - x. Anecdotal evidence identifies the fact that there are **facility space issues in multiple buildings**. Rochester should review facilities and plan appropriate space for: expanding pre-school typical peer population; students returning from outside placements being incorporated primarily into middle and high school; workspace for related service providers; and Maple Street underutilization, if that facility is to remain open.
  - xi. Other than consideration for developing the Loud program for students with autism and/or behavioral needs, **we do not find student achievement advantages nor significant costs savings that would indicate centralizing special education services should be recommended.**
  - xii. **Staff members at McClellan are encouraged to review service delivery** to ensure that all students are served in the least restrictive environment possible. Service delivery and exposure to the general curriculum may influence lower achievement scores discussed in section 5. (Figures 3.8, 4.1 and 4.4)

- xiii. **Rochester should begin planning for anticipated changes in preschool requirements** when the federal government sets targets for indicator 6. Rochester should develop an option that includes more preschool students in programs with at least 50% typically developing peers.

D. Outcomes, school completion and discipline

- i. When appropriate, **use the juvenile authorities** to handle students who exhibit misbehavior to the degree that they should be considered by the court as incorrigible and considered for juvenile incarceration keeping in mind the level of competency of the student as identified.
- ii. **Increase students with disabilities' exposure to core curriculum** which will result in higher student achievement as assessed on standardized, required tests. Adjusting staffing levels, supporting the transition into and being in regular education, moving all special education and related service staff to focus on core curriculum should both reduce special student pullout time and result in higher academic success.
- iii. **Re-evaluate entrance screening.** Evidence was presented that current entrance screening was fairly thorough, yet consultants were told by some staff that they were under the impression that they were to presume a child was special education as opposed to not. This presumption is only valid for stay-put purposes where a child comes to the school with documentation that he/she was under jurisdiction of an IEP or possibly an RTI program.
- iv. **A check-in/check-out model** (reference Crone, Horner & Hawkin, 2004) for young students' exhibiting misbehavior should be considered. This model functions effectively in a manner where students are in classes but start the day with a specialist who provides support by identifying target daily goals with the student and practices integration activities/skills quickly, then just before the end of the school day meets again with those students to review how the student performed that day. Teachers throughout the day provide feedback on a simple behavior checklist throughout the day (i.e., OK/Not OK or a smile/frown review) and this feedback is reviewed and reinforced with the student at that short end-of-school-day meeting.
- v. In addition to increasing the staff focus on academic achievement, **paraprofessional aides should support academics.** Scores indicate that students with specific learning disabilities and developmental delays fall below the district average score at several grade levels. At the same time anecdotal evidence provided instances where paraprofessionals were available and likely able but were merely sitting as a presence during instructional time or doing worksheet type activity that was less

than academically meaningful. We suspect that Rochester's aides can be much more useful in providing academic support than current use would indicate.

- vi. Rochester should consider **more inclusive practices at McClelland and Maple Street** so that all children are exposed to the general education curriculum to the greatest extent possible. Exposure to the general curriculum will provide additional opportunities for students to learn the required curriculum and should serve to improve outcomes.
- vii. **McClelland and School Street Schools** should review historical data and consider a strong intervention program for early kindergarten to help address weak readiness skills. (Figure 4.1)
- viii. Rochester should **review reading interventions** available to students with specific learning disabilities to ensure that all buildings are providing a range of interventions designed to address the unique learning needs of these students.
- ix. Charts show that across all grade levels of reading and math, **students who are in the general education classes perform better than those in separate classes**. This is more of a concern at the middle school level where no students are in a resource room based on individual need. As previously mentioned in this report, Rochester Middle School should restructure current service delivery to provide the opportunity for students to participate in general education classes as much as possible with the support from a resource room as necessary to meet individual student needs. Students at the middle school level who are in general education classes more than 80% of their school day perform significantly better on achievement tests than those who are pulled out into separate classrooms (Table 4.8).
- x. **Students at Rochester Middle School are most likely to receive formal disciplinary action (i.e., out of school suspension)**. Many of these students are later removed to outside placements. The middle school should review both service delivery options and behavior support systems to ensure that strong proactive programs are in place to engage and support students and reduce punitive reaction. (Figure 4.14)
- xi. **Transportation personnel** who come in contact with special education students should undergo periodic training for general and child-specific purposes and be privy to information necessary for them to do their jobs appropriately for special students, if they don't already.
- xii. **It is recommended that the process for suspending students with disabilities be reviewed**. One should expect these students to be suspended less from school because of the special instructional services provided to them yet administrators do need

the option of suspension available when needed and appropriate. Manifestations of a student's identifying disability being cause for suspension should be taken very seriously and be cause for an IEP review as opposed to removal from the very services provided for in the IEP. Administrators may need to reinforce the fact that prior to a special student being suspended or expelled from school there must be proper deliberation including some type of manifestation determination. In addition, a student who has an IEP and who exhibits behavior that demonstrates some level of likelihood that suspension might be necessary in the future, should have a **behavior plan** in place that works to avoid the need for the suspension.

- xiii. **Student achievement must become paramount to everyone.** This can be accomplished in large part by publishing to administrators, teachers and school committees, data demonstrating progress or lack of progress regarding groups of special needs students and appropriate group targets. All staff should have student achievement data available for review and should focus instruction on improving scores.
- xiv. Rochester should review their **core approach to reading at the early elementary grades** to ensure that the program meets recommendations by the National Reading Panel. High percentages of students requiring specialized instruction may indicate that core programs are not comprehensive or do not differentiate adequately to meet the needs of students. Generally, it is presumed that approximately 80% of the population of students should receive appropriate instruction in the general education core curriculum. Rochester has over 18% students with disabilities as well as a well developed intervention program, suggesting that the core curriculum may not be adequately serving 80% of the students.

#### E. Costs and funding

- i. **Processing the need for outside district services should be much more structured and data-driven.** Currently the use of outside resources is, at the very least, inefficient and costly, and in fact could be considered negligent with respect to the spending of taxpayer funds for undocumented-need services. Only low-incident disabilities (1 - 4 student identifications) should be considered for such services. From data provided us by the district, current costs for 34 district-placed special education students at private placement locations is over two million dollars. Information provided us indicated that it is likely that 30 of those students have profiles which would allow them to qualify for a

developed unit in-district. The resulting unit cost of assigning three teachers, six paraprofessionals, one FTE related service staff member, purchasing some equipment, and calculating in a loss of some catastrophic funding for those students, is a savings of over \$1 million at the same time that these students would be brought into compliance being in the least restrictive alternative in or at the closest setting to their home school classroom. (That savings includes the expenses of the remaining four students being at the low-incidence private placement.) Transitioning the students from out-placement to in-district unit(s) should be planned, thoughtful, and appropriate to insure for successful educational programming.

- ii. **Reduce out of district placement staff** to just 20% of current staffing for one year while students transition into district from other placements. Support will be necessary for students, parents and staff for one transition year, after which these services will be in-house for appropriate students and supported by general staffing patterns. This should save the district almost one million dollars annually including transportation cost savings.
- iii. **Develop a cooperative program with area districts** such as Dover, Farmington, and Somersworth, for low-incidence students.
- iv. **Adjust staff to provide more consistent staffing levels and student ratios across buildings and district.** This model will provide more instructional staff at McClelland to better support inclusionary practices. McClelland also could use support in developing more of a services-oriented focus and dealing with students along the spectrum of special education continuum as student achievement is much lower than should be expected.
- v. **With respect to Maple Street**, since there are so few students there, either more paraprofessionals are recommended to help support inclusionary practices in that building, more support and a stronger focus on student achievement, and at the same time more regular education students need to be drawn into the building (for instance a magnet program might be developed to utilize the facility more efficiently and effectively) **or** Maple Street should be closed and all students relocated to existing schools/programs.
- vi. **Revise staffing patterns at Rochester Middle School** to open the opportunity for resource rooms to support math and reading and to include more students in general education classes. Three staff members should be moved to a resource room role (i.e., providing support in math, reading and general interventions such as organizational and behavior support). Properly trained paraprofessionals should support students in inclusive settings. Again, general interventions for regular education students may be different than specialized instruction required for an individual student with a disability.

- vii. **Rochester currently employs five more speech therapists than the amount required by student IEPs.** Rochester should review needs and adjust staffing accordingly. Additionally, Rochester should ensure that student IEPs accurately reflect student therapy needs. Rochester should further review the extent to which this discrepancy impacts governmental Medicaid and Catastrophic Cost reimbursements and the availability of speech therapists in other area schools where staffing shortages may exist. A total of 10 full time speech therapists could adequately meet current IEP obligations when considering travel time, record keeping and assessment obligations (Figure 5.7).
- viii. Rochester uses a 1210 function code to track costs for all general fund special education costs. While this helps provide the district with a general idea of costs, it makes it difficult to analyze more specific costs, over and under-utilization of staff, and program needs. Additionally, a review of a current payroll showed somewhat inconsistent coding between buildings, again, making it more difficult than necessary to track costs for special education programs. **We strongly recommend using a consistent funding structure to help track costs** adopting a system such as the one from the New Hampshire Financial Accounting Handbook for Local Education Agencies to include more specific function codes. (p. A-7-8, specifically outlines the types of costs that, when disaggregated, will help the district make informed program decisions. (Figure 5.4 and 5.11)
- ix. In addition to the above, we recommend the **district develop and utilize a separate object code for the pre-school program.** Current district budget reports do not reflect that this is being done, which makes it difficult for district administrators to make informed program decisions regarding preschool costs.
- x. For purposes of reducing unnecessary expenditures, **Rochester should implement a reduction of staff positions where their services are not required to address student IEP needs.** Specific staffing recommendations are included in this report. (Figures 5.5 and 5.12)
- xi. Rochester should **review in-district costs for any student who has an aide** assigned to ensure maximum catastrophic reimbursement for these students as well as those in out-of-district placements.
- xii. **Revise staffing patterns to reduce the number of paraprofessionals across the district.** While these individuals may provide support, there is evidence that overuse of paraprofessional staff increases student dependence and decreases student achievement (i.e., students receive too much, and less than meaningful, support to complete activities so assessment of related skills is skewed. (Figures 5.5 and 5.12)

- xiii. Rochester currently employs nine **occupational therapists** which appears to be appropriate to meet student IEP needs based on an average caseload of 40 students per therapist and allowing for travel time, assessments and record keeping. Rochester is encouraged to maintain the current level of occupational therapists assigned as reviewed in the chart above. This should also allow some flexibility to provide services to students at risk or those not currently served. (Figure 5.8)
- xiv. Rochester currently employs two **physical therapists**, which is insufficient to meet district need when applying the same calculations as with other therapists. Data supports high caseloads compared to other related service staff in the district. Rochester should review needs and adjust staffing accordingly. The district could consider adding a Physical Therapy Assistant (PTA) to assist in meeting needs. Alternately, IEP teams might consider reviewing student needs and determine whether other providers (such as Adapted Physical Education Instructors) are qualified to address student needs. (Figure 5.9)
- xv. There is **insufficient data to support need for two Adapted Physical Education Instructors** (8 students require a total of 9 hours APE time weekly). The District should reduce APE to .5 FTE therapist. Alternately, IEP teams might consider reviewing student needs and determine whether an Adapted Physical Education Instructor can appropriately address needs currently provided by physical therapists. (Figure 5.10) It should be noted that a very high number of students at Rochester Middle School have Adapted Physical Education on their IEPs compared to standard expected levels and compared to other Rochester Schools. The district should consider the fact that most physical education instructors themselves are able to differentiate activities to meet the needs of the vast majority of students with disabilities and those instructors should be used whenever possible for purposes of fiscal and proper IEP compliance purposes. (Figure 5.10)
- xvi. Three district guidance counselors, three ESL instructors and five behavior specialists are coded in special education budget codes and thus impact cost accounting. The district should review this practice to **ensure these individuals are appropriately coded** (Figure 5.11)
- xvii. The budget should reflect a **reallocation from the costs of outside placements** to proper professional development for current staff such that the district maintains a quality program in-house to service special students.
- xviii. **A high number of students at Rochester Middle School and Spaulding High School have aid/tutor services included on their IEPs.** The District should review the need for these services.

# Appendices

## **A. Data Charts**

1. District culture, school climate and administration
2. Disability specifics and comparisons
3. Service delivery and programs
4. Outcomes, school completion and discipline
5. Costs and funding

## **B. References**

## **C. Acronyms**