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I. Purpose of the Study and Methodology

Purpose of the Study

In December 2022, Frederick County Public Schools (FCPS) engaged with Public Consulting Group LLC (PCG) to conduct an independent review of its special education services. This report describes the current state of the special education program in FCPS and is designed to guide the District toward continuous improvement.

The study examined the following guiding questions by category:

Learning Environment and Specialized Services

1. How is the District’s continuum of services organized to support a Free Appropriate Public Education (FAPE) for students with disabilities? To what degree do students have access to the general education curriculum? How are inclusive practices employed?
2. To what extent is there disproportionate representation?
3. What are current behavioral practices?
4. Specifically, how do the following specialized programs operate?
   a. Specialized self-contained, Transportation and facilities

Family and Community Engagement

5. To what extent are parents/guardians of children with Individualized Education Programs (IEPs) satisfied with their child’s educational program?

Human Capital

6. How does FCPS organize and utilize human capital resources, and what staffing services are required to support the special education program Pre-K to graduation?

Systems and Structures

7. How does FCPS allocate financial resources in a way that facilitates maximum student outcomes, and how is data used to support decision making?
8. What is the appropriate organizational structure for FCPS?

High Expectations

9. To what extent does FCPS implement a rigorous process to systematically monitor educational benefit? How do IEP teams determine services and placement?

Leadership

10. How does FCPS organize leadership to support special education and foster a culture that is focused on improving outcomes and post-secondary preparation?

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

Over the course of the 2022-23 school year, PCG conducted a mixed-methods study of the special education program in FCPS. The findings and recommendations related to programs, policies, and practices resulted from a comprehensive analysis of several data sources. Sources included 1) Data and Document Analysis, 2) Organizational Focus Groups and Interviews, 3) Student File Review Focus Groups and Independent IEP Review, 4) a Staff Survey and a Parent Survey, and 5) School Visits. These components were drawn from Research and Practice Literature to inform the findings and recommendations. PCG used publicly available achievement and financial information to compare key FCPS statistics against local district, state, and national data. The method and sources of data are triangulated to increase the validity of the conclusions, in this case, program implementation, identification of gaps, and recommendations for the continued improvement of FCPS’s special education programs and services. Details of each data source are included in the full report.
II. District Context

Frederick County Public Schools (FCPS) is situated in the fast-growing area of Frederick County, Maryland. Like other outlying sections of the Washington Metropolitan area, Frederick County has experienced a rapid population increase in recent years. The population has increased by over 15,000 residents, from 271,709 in 2020 to 287,079 in 2022.1 Similarly, the District’s student population has risen from 42,700 students in the 2018-19 school year to 46,899 in the 2022-23 school year. FCPS is one of the largest school districts in the United States, ranking 116th in size as of 2019 demographic data,2 and the County has a total area of 667 square miles. This rapid increase in the student population is filling many schools to capacity, necessitating ongoing conversations about facilities and programming offerings across its 69 schools and large geographic region.

FCPS consists of 69 schools serving over 46,000 students from pre-kindergarten through 18-21 programming. It boasts a team of over 7,000 employees, of which 400 are special education teachers and over 700 are special education instructional assistants.3 There are 38 elementary schools serving over 20,000 K-5 students, 13 middle schools serving 10,000+ students in grades 6-8, and 10 high schools serving over 14,000 high school students. The District also has one alternative school, one special education school, one virtual school, and one secondary transition program, in addition to four charter schools and one career and technology center.

Over the years, the classification rate of students with disabilities in FCPS has remained relatively stable, averaging between 10 and 11 percent over the past four years.

In recent years, FCPS have achieved notable accomplishments, including:

- Exceeding Maryland averages with scores that consistently surpass national averages on the College Board SAT.
- On a 1-5 star scale, 50 of 58 state-rated schools achieved 4 or 5 stars, and none received fewer than 3.
- FCPS’s Class of 2020 graduation rate was 92.4% (compared to Maryland’s 86.8% average), while the dropout rate was 4.0% (compared with the state’s 8.3%).
- Students in the class of 2021 received $62 million in scholarship offers.
- The report cards show that FCPS ranks in the top third in the state in overall student performance.4
- Received a Meets Requirements designation under the special education State Performance Plan.

Through information gathered from interviews, focus groups, and surveys for this report, it has become evident that the District’s staff and teachers deserve praise for their outstanding contributions to education. Their commitment to collaboration with both students and parents stands out as a strength. Teachers actively strive to create supportive learning environments where students feel valued and safe. Moreover, they display an eagerness to engage in continuous professional learning, seeking opportunities to enhance their teaching practices and refine their craft. This dedication to ongoing growth and improvement underscores the teachers’ commitment.

Further, as evidenced by this program review and the facilitation of the community Blue Ribbon Task Force, FCPS is open to self-reflection and improvement. This orientation is especially notable, given the scrutiny the District underwent during the 2020-21 Department of Justice (DOJ) investigation into the use of restraint and seclusion practices for students with disabilities. The investigation left a profound impact.

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1 https://www.census.gov/data/tables/time-series/demo/popest/2020s-counties-total.html
3 https://www.fcps.org/about/fast-facts
on the school staff, especially special educators, school leaders, and special education instructional assistants (SEIAs), and families. The level of distrust, uncertainty, and fear many experienced over the past year is still palpable. Building back trust, a sense of positive collaboration between school staff, leaders, and parents, and a proactive momentum of holistic improvement will be paramount in the coming years.

This report will address several pressing concerns within FCPS that directly and indirectly impact special education. Some of the key issues include the following.

Continuum of Services

The District has substantially invested in specialized programs for students with significant cognitive and behavioral disabilities, specifically adding sixteen Board Certified Behavior Analyst (BCBA) positions per the requirements of the DOJ settlement and extending special educator and SEIA positions to 11-months to allow for training and planning. These programs are well resourced and structured. There are, however, gaps in support for students with high functioning autism and intensive and specialized academic support for students with disabilities who spend the majority of their day in general education classes.

Behavior Support

Staff expressed concerns about the limited amount of training they have received on how to apply acceptable de-escalation strategies and the increase in intensity of student behavior. Many described feeling uncertain about what strategies are available to them when students are dysregulated and the impact of outbursts on the rest of the students in the classroom or school.

Leadership and Organizational Structure

The recently appointed Acting Associate Superintendent of Special Education and Student Services brings increased visibility of and support for students with disabilities. Feedback solicited during this review highlighted the need for a clearer, more streamlined organizational structure, designed to better support schools and increase responsiveness.

Family Engagement

Partners for Success (PFS) is intended to increase parental involvement in special education and to assist families in resolving concerns, and to provide information about disabilities and community resources. The FCPS community spoke highly of this resource and described the need to expand this type of support through advocacy centers and other training avenues. Having more opportunities for parents to engage, learn, and make connections can only serves to improve trust and the relationship between the community and schools.

Addressing these multifaceted challenges requires a comprehensive and collaborative approach. Stakeholders at all levels must be involved in efforts to improve structural stability, enhance training and data utilization, rebuild trust within the community, and ensure equitable and effective support for students with disabilities. This report aims to provide a detailed analysis of these issues and offer actionable recommendations.
II. Summary of Strengths and Opportunities for Improvement

The following section highlights the strengths and opportunities for improvement in each area reviewed as part of this evaluation.

State Performance Plan (SPP) and FCPS’s Results Driven Accountability (RDA)

**Strengths**

- **Achievement.** FCPS met or exceeded grade level average for all students and students with IEPs for reading and mathematics across grades three, eight, and ten compared to state averages.
- **Educational Setting.** FCPS educates students with disabilities 80 percent or more of the day in the general education setting at rates higher than the state average.
- **Graduation Rate.** FCPS has higher four-year graduation rates for students with disabilities than the state average by 8.4 percentage points.

**Opportunities for Improvement**

- **Disability Classification.** FCPS identifies students under the disability category of multiple disabilities at significantly higher rates than both the state and nation.
- **Risk Ratios for Overidentification.** FCPS exceeds the 2.0 threshold for Asian students identified under the disability category of autism (2.46). Hispanic students were also at-risk of meeting the 2.0 threshold under intellectual disability (1.53).
- **SPP Indicator 7.** FCPS consistently did not meet state targets for all preschool indicators.
- **Inclusive Practices.** FCPS placed students with intellectual disabilities in self-contained settings at much higher rates than the state and nation.
- **Dropout Rate.** There has been an increase in the percentage of students with IEPs who are dropping out before graduating high school.

**Summary and Implications**

The data in this chapter showcase both positive trends in FCPS as well as areas that require further analysis. FCPS has met state targets per the SPP and has demonstrated achievement higher than the state average for reading and mathematics for both students with and without disabilities. These indicate FCPS is on its way to developing strong systems that support student achievement. It is notable FCPS has a higher four-year graduation rate for students with and without disabilities than the state average. There are some concerning trends, however, related to the achievement gap in reading and math for students with IEPs and increasing dropout rates for students with IEPs over the last two years. This is an area FCPS should further investigate to determine why students with IEPs are dropping out at much higher rates than previous years.

In looking at disability classification, FCPS identifies students under the disability classification of multiple disabilities at much higher rates than the state and nation. This indicates that FCPS could be using the definition of multiple disabilities incorrectly in making these determinations. Further analysis and understanding of the criteria used for making this determination would be warranted. FCPS also exceeds the 2.0 risk ratio threshold for the identification of Asian students under the disability classification of autism. This indicates Asian students are more than twice as likely to be found eligible for special education under the classification of autism. Additionally, Hispanic students are 1.5 times more likely to be identified as having an intellectual disability, and while this does not exceed the 2.0 threshold for
significant disproportionality, it does indicate there should be further analysis to ensure both Asian and Hispanic students are not being disproportionately identified under these disability categories.

School-age students with disabilities were educated at a higher rate in an inclusive general education setting than the state target. FCPS has a high number of students with intellectual disabilities not included in the general education settings: this rate is significantly higher rate than both the state and nation. FCPS should conduct further analysis into why students with intellectual disabilities are not afforded more inclusive opportunities throughout their school day.

Lastly, data show that FCPS fell shy of consistently meeting the state target for preschool outcomes. This will be another area for FCPS to further analyze to determine if there are opportunities at the preschool level to increase readiness of students as they enter the K-12 setting.

### Learning Environment and Specialized Services

<table>
<thead>
<tr>
<th>Strengths</th>
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<tbody>
<tr>
<td><strong>Multi-Tiered System of Supports (MTSS)</strong>. Well-established MTSS framework with expectations and guidance.</td>
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<td><strong>Least Restrictive Environment (LRE)</strong>. Prioritization of educating students with disabilities in the least restrictive environment.</td>
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<td><strong>Central Office Commitment</strong>. Department of Special Education (DSE) has displayed an ongoing effort to support schools and staff across initiatives.</td>
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<tr>
<td><strong>Procedures and Guidance</strong>. Support documents and guidance are available to school-based teams to assist with consistency and expectations.</td>
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<tr>
<th>Opportunities for Improvement</th>
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<tr>
<td><strong>Multi-Tiered System of Supports</strong>. Refinement of implementation of MTSS framework at the school level with unified expectations, progress monitoring, and consistency of coordination with academic and behavioral expectations.</td>
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<tr>
<td><strong>Specialized Programming</strong>. Restructure specialized programs to ensure students are placed in the appropriate program to address their instructional needs and that programs are designed with continuity across grades and levels.</td>
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<tr>
<td><strong>Inclusive Practices</strong>. District level vision, expectations and professional learning fostering inclusive practices and co-teaching must be established from district administration.</td>
</tr>
<tr>
<td><strong>Behavior Supports</strong>. School staff are struggling to support students with challenging behaviors and are requesting strategies to handle behavioral crises.</td>
</tr>
<tr>
<td><strong>IEP Development</strong>. Student file reviews revealed inconsistencies in the quality and organization of IEPs developed across all documented areas.</td>
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### Summary and Implications

Although the District has been notably compliant based on reports produced by Maryland for the State Performance Plan and Annual Performance Report, there is much more worthy of consideration. The district’s involvement with the DOJ and corrections related to restraint and seclusion have left parents and staff working to rebuild relationships and trust within special education. This stems into all areas of the IEP process and procedures in special education from both an external and internal lens. While FCPS has many noteworthy areas regarding the comprehensiveness of special education evaluations that provide meaningful information, a continuum of services for students with disabilities, and strides being
made to ensure BCBAs are hired to support special education programming across the district, challenges continue to exist as part of the current structures in special education.

These challenges include the following:

- Parents feel the district does not always adhere to the timelines for referrals and evaluations, and some parents do not fully understand the MTSS process as an intervention and instructional framework to support all learners, regardless of disability designation.
- Staff also expressed concern regarding the timeliness of the referral process and did not always feel their school teams understood the steps and timelines for the IEP referral process, although staff did feel the results of these evaluations provided meaningful information about student's educational needs.
- While many staff (62%) felt the district offered a continuum of services to meet the needs of all students, there was still a significant proportion of staff that disagreed.
- A review of IEPs indicated that PLAAFP statements in the IEP did not always have data to support the development of IEP goals and short-term objectives in IEPs were not always measurable depending on which professional was writing the objectives. Furthermore, it was noted there was an overabundance of supplementary aids included in the IEPs, which can be challenging to implement. It is important to ensure that supplementary aids and accommodations are individualized to the needs of the student and do not simply reflect good teaching practices, as those should be part of core instruction within an MTSS framework.
- Staff felt there was not adequate staffing to support the needs of students with IEPs, often citing concerns to being pulled to support in other classrooms with student behavior, having high amounts of paperwork to complete, and having to provide coverage when substitutes were not available which makes it challenging to see students on their caseload or provide appropriate push-in/co-teaching services.
- Parents noted IEP meetings often felt rushed and their concerns were not heard or fully considered by IEP teams.

It will be important for FCPS to develop systems and practices that meaningfully involve parents and caregivers in all aspects of their child's education to ensure success for students and collaboration among school teams. It is important to highlight of the parents who responded to the survey, most parents felt the IEP process was collaborative between general educators, special educators, and related service providers and many parents felt they had a good working relationship with their child's teacher. This is something for FCPS to build upon to ensure all parents share that same sentiment when it comes to collaborative practices between the district, schools, and families.

In addition to ensuring collaborative structures are in place, FCPS should also review current IEPs for consistent development throughout the school district. While the IEP is a critical compliance document that must be adhered to, it is also the tool used to measure student progress and adjust based on student needs and goal attainment. FCPS should examine the current structures in place for IEP writing and the current software and online systems used to manage IEP development to determine if they are effectively supporting staff in IEP development and compliance. Given a large percentage of staff (52%) disagreed there is effective and consistent communication between schools and district level staff indicates there is a need to develop consistent systems and structures to reduce inconsistencies in practices. Finally, developing a continuum of services that are individualized and intended to support students in their neighborhood school, not just another "program" will be important work for FCPS in the future.
Leadership and Organization

Strengths

- **Robust ACTT Team.** The ACTT team provides services across the District to ensure students with disabilities have the tools they need to communicate.
- **Speech and OT/PT services.** Parents value the related services provided to their children.
- **IEP Facilitator Positions.** FCPS recognizes the need for additional IEP meeting support in schools and has started to add IEP Facilitator positions.
- **Office of Special Education and Student Services (OSE&SS).** The OSE&SS unifies the Departments of Special Education and Student Services under one umbrella.

Opportunities for Improvement

- **DSE Organizational Structure.** The DSE organizational structure is viewed as confusing and not supportive to schools.
- **IEP Facilitators and Inclusive Practices Specialists.** There is a need for specialized support from the central office to assist with IEP meeting facilitation and building inclusive practices.
- **Strategic Vision.** Given the input from the Blue Ribbon Task Force and this report, the DSE is well positioned to now set a strategic vision and action plan for the department.

Summary and Implications

The value students with disabilities add to a school culture cannot be underscored enough, and FCPS has worked hard to develop the DSE to support the need. It will be critical in the future to develop collaborative structures where all members of the DSE understand their role in supporting the vision and mission of the department with clear action steps to guide that work. This will include ensuring the DSE aligns to the overarching strategic goals outlined by the district and develops a clear action plan that encompasses recommendations from this report as well as the Blue Ribbon Task Force. This will also require clear and consistent communication structures throughout the organization, both horizontally and vertically, so all staff members hear the same message.

To begin this important work, DSE will need to closely examine their organization’s structure, roles, and responsibilities to ensure consistency of these roles. As it currently stands, roles and responsibilities appear to lack clarity and look different in practice than they do on paper. Staff also felt the roles within DSE were often siloed and that the organizational structure should be redesigned to better serve schools and collaborate across departments. Some staff felt the DSE were too far removed from the day-to-day work and did not fully understand the challenges at the school level. Some DSE members felt they were often operating in a reactive mode, as opposed to a proactive mode to support meaningful change through coaching and collaboration with special education staff and building leaders.

It will also be important when examining each role within DSE to look for redundancy and gaps within the current structure. For example, it would be important to clarify the difference between what special education teachers and SEIAs can and cannot do to support the consistency of practices across the district. It will also be critical to look at the collaborative structures between district teams and from the district to the building level. One of the biggest challenges many districts face is having a special education department operate in a silo. This diminishes the ability to collaborate and often leads to the reactivity of the department or hyperfocus on compliance as opposed to instructional practices which are critical to creating a proactive model of support throughout the district. While we recognize the challenges that exist in creating these structures, shifting the focus of the DSE to address both compliance and best instructional practices can only be done through collaboration and a clear organizational structure in a coordinated manner.
Family and Community Engagement

Strengths

- **Partners for Success (PFS).** FCPS has a Partners for Success staff person to assist with parent questions and concerns.
- **Office of the Ombuds.** The Ombuds also provides support for parents.
- **Accessible Communication.** FCPS has prioritized providing accessible communication to families.

Opportunities for Improvement

- **Website.** The DSE website has limited resources for parents, especially those who are non-native English speakers.
- **Parent Advocacy Centers.** There is an opportunity to expand parent trainings and advocacy centers across the county.
- **Clarification on PFS and Ombuds Roles.** The roles and responsibilities of the PFS and Ombuds staff, specifically how they work together, could be better clarified.

Summary and Implications

Developing strong family-school partnerships is an essential strategy to improve student learning and promote equity to support every learner within the school community. The importance of this cannot be emphasized enough for all students, but particularly for families of students with disabilities as they often struggle to understand and navigate all the nuances involved in special education. Developing trust through open communication and collaboration with families will benefit all stakeholders within FCPS.

It should be noted that parents expressed gratitude toward FCPS for conducting this review and also the need for increased and proactive communication to build strong partnerships. Understanding the individual needs of each family and their preferences for communication will be helpful as inconsistencies were noted across schools. Many families expressed a desire to hear more often about their progress, aside from just progress reports and annual IEP meetings, while other families felt daily communication could be overwhelming and wanted a weekly update instead. In developing partnerships with families, it will be helpful to understand the best methods of communication and how often families would like to be updated. Building trust and rapport with families at the district, school, and classroom level will support rebuilding parents’ faith and trust in the system, not just with individual families.

Parents surveyed noted points of pride within FCPS that included satisfaction with instructional support and related services, along with the responsiveness of staff when families reached out. Areas parents noted for improvement included the fidelity of service delivery, more and better communication, inclusive practices, more staff and smaller class sizes, and valuing parent voice in the IEP process.

Another area of note was accessible communication for families whose first language is not English. FCPS has increased resources for the Deaf community in recent years, however, there are still challenges for families that are non-native English speakers and their accessibility to IEP documents and home-school communication. This creates additional barriers for these families to engage with the FCPS in a meaningful way and advocate for their child’s needs within the system.

FCPS operates a PFS center that bridges collaboration and communication for special education. PFS has provided several workshops, newsletters, resources, and events for parents and the community. The majority of families, though, reported they did not receive communication about training or were unaware of any training that occurred. PFS helps families for IEPs and families shared some ideas on how to better utilize PFS moving forward which included guidance for new parents new about the special
education process in FCPS, connections to other families in special education in FCPS, more information about the programming and services in FCPS, and advocacy resources to build capacity for families.

In addition to examining how the PFS center is utilized, parents also expressed confusion regarding the role of the Ombuds and PFS. Parents need multiple ways to gain support and resolve concerns in a non-litigious manner. Working with the Ombuds can be an important resource for parents. The district has an active parent advisory committee for special education (SECAC), which serves as another resource for families in the community.

### Human Capital

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<th>Strengths</th>
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<tbody>
<tr>
<td><strong>Dedicated Staff.</strong> FCPS staff were widely praised for their commitment to and care of students.</td>
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<td><strong>Recruitment.</strong> There is a multi-pronged recruitment approach to fill vacant positions.</td>
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<tr>
<td><strong>Professional Learning.</strong> The district offers a wide array of professional learning opportunities for all staff.</td>
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<tr>
<td><strong>DOJ Staffing Requirements.</strong> The district has made ongoing progress to abide by the hiring requirements established by the DOJ.</td>
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<tr>
<th>Opportunities for Improvement</th>
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<tbody>
<tr>
<td><strong>Recruitment and Vacancies.</strong> As of December 2022, over 10 percent of special education teacher positions remained unfilled.</td>
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<td><strong>Staff Wellbeing and Safety.</strong> Staff expressed significant concern about their own mental health and psychological and physical safety.</td>
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### Summary and Implications

FCPS has not been immune to the challenges districts nationwide are facing specific to finding and retaining special education teachers. Staff noted recruitment and retention challenges within special education and highlighted the lack of diversity within staffing, high caseloads, challenging student behaviors, and limited time for professional learning as some of the biggest obstacles they were currently facing. Many staff felt they were reaching a “burnout” point and were concerned about staff safety when handling significant student behaviors. It will be important to consider staff wellness in order to prevent teacher “burn-out” and work with building leaders in this effort.

Staff appreciated the opportunities for blended professional learning and the recordings of trainings the district provided but struggled with the lack of options for professional learning as it related to each person’s current needs for growth and development. A large portion of recent trainings were focused on restraint and seclusion due to the DOJ settlement. Yet these trainings lacked alternative strategies for supporting student behavior. Staff felt additional training focused on how to support students in crisis, Positive Behavioral Interventions and Supports (PBIS), RtI/MTSS, and Disability Specific training would be beneficial.

DSE offers a menu of training courses for staff and a year-long professional learning opportunity for special education staff that focuses on special education teams working together to refine best practices. Additional trainings noted as effective and helpful included Orton-Gillingham, Language Fundations, and Sounds of Syllables, a course on case management, and Science of Reading for K-2. These options, along with those identified by staff in this chapter, provide an excellent starting point for professional learning opportunities in FCPS.
Systems and Structures

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<th>Strengths</th>
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<tr>
<td><strong>Policy and Guidance Documents.</strong> FCPS has developed a wide range of documents created for school staff to assist with implementing and monitoring special education services.</td>
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<tr>
<td><strong>Compliance Monitoring Plan.</strong> The district has an organized and comprehensive approach to ensuring special education compliance in schools using a variety of tools.</td>
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<tr>
<td><strong>Staffing Ratios.</strong> Special education teacher and SEIA to student ratios are low compared to other districts nationally.</td>
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<th>Opportunities for Improvement</th>
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<tbody>
<tr>
<td><strong>Special Education Teacher Duties.</strong> There is a need to clarify their roles and responsibilities to ensure they can deliver required IEP services.</td>
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<tr>
<td><strong>Paperwork and Technology.</strong> District systems, including the Online IEP system, need to be evaluated and improved in order to reduce time spent on redundant paperwork.</td>
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Summary and Implications

With regards to staffing ratios, FCPS caseloads for all staff examined, including special education teachers, SEIAs, speech and language pathologists, and school psychologists, show they are lower than average compared to other districts nationally. This indicates that caseload sizes in FCPS are appropriate both compared to other districts and within the staffing plan FCPS created. FCPS also uses a complexity model for caseload projections to support schools that have students with higher needs; however, it was unclear which schools received additional FTE support based on this formula.

While caseloads are lower than average when compared to other districts, if staff feel overwhelmed, it is important to look closely at their roles and responsibilities to see if there are additional responsibilities they are given impacting their ability to work with students. This is why comparing workloads versus caseloads is a valuable analysis.

With special education teachers in FCPS providing reading interventions to general education students that are not on their caseload and the practice of pulling SEIAs for other school duties, the reality of these ratios could be different than what is allocated. There were also some concerns that there was more focus on specialized programs and staffing at the expense of supporting other special education teachers with SEIAs.

An additional challenge that was discussed by staff included the burden of paperwork and the OIEP system that seemed to be time-consuming and cumbersome. Staff felt the effort it took to complete IEPs in the system, in addition to all the other paperwork requirements, took up a significant amount of time that could be better utilized in supporting students. This is an area that FCPS should dive deeper into as there could be a variety of ways to alleviate this additional burden on staff if paperwork is contributing to staff burnout and time consuming to complete.
IV. Recommendations

PCG was contracted to provide an objective view of the special education program in FCPS and has identified in this report both strengths and areas of improvement that require focus in the coming years. FCPS leadership, the Board of Education, and staff alike have demonstrated a commitment to investing in student-centered initiatives and systems. PCG saw ample evidence that FCPS has a solid foundation on which to build. FCPS has many notable strengths, including its commitment to improving outcomes for students with disabilities and its willingness to undertake this review and act on the recommendations as part of a continuous improvement cycle.

The recommendations listed below serve as a roadmap to address areas of improvement, leading to the future growth of the special education program. Each is interrelated and will require a significant investment on the part of FCPS. Implementation of these recommendations will set the foundation for all other action steps that emerge from this report. The action steps listed under each recommendation below are organized in a manner that provides a comprehensive view of the activities required to initiate change. Although components of the action steps can be implemented within a shorter timeframe, full-scale implementation of the recommendations may take three-to-five years.

Recommendation areas are organized into the following categories.

EXHIBIT 1. RECOMMENDATIONS BY CATEGORY

<table>
<thead>
<tr>
<th>Domain Category</th>
<th>Recommendation Area</th>
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<tbody>
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<td>Learning Environment and Specialized Services</td>
<td>1. Multi-Tiered System of Supports</td>
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<td>2. Identification Practices and Disproportionality Monitoring</td>
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<td>3. Inclusive Practices</td>
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<td>4. Specialized Programs</td>
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<td>5. Behavior Support</td>
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<td>6. IEP Development</td>
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<td>Leadership and Organization</td>
<td>7. DSE Organization</td>
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<td>8. Strategic Vision</td>
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<tr>
<td>Family and Community Partnerships</td>
<td>9. Report Recommendations</td>
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Through this review, PCG assessed FCPS against the elements listed with each Research to Practice section below and provides recommendations in areas that require additional improvement. The resources for each section, detailed in the Appendix, serve as the foundation for these elements and can be used by FCPS to enact the recommendations. Some resources provide a foundational understanding of best practices while others serve as high-quality examples of guidance documents. These lists are supplemental to the references listed throughout the report.
Learning Environment and Specialized Services

**GOAL**

To deliver instruction and interventions within an inclusionary framework and with Individualized Education Program (IEP) fidelity, leading to increased access and progress in grade-level learning standards and reducing disproportionality.

**RESEARCH TO PRACTICE**

High-quality instruction in the general education environment is the first and most critical element of ensuring that students with disabilities achieve at high levels, but many students with disabilities also need high-quality and highly individualized special education and related services.

Tenets of an effective system to support the academic, behavioral, and functional needs of students with disabilities include the following elements.

**Access to the General Curriculum**

- The district has a robust Multi-Tiered System of Supports (MTSS) framework that is consistently implemented and appropriately supportive of struggling learners.
- Teachers utilize collaborative planning and instruction that includes application of Universal Design for Learning (UDL) principles and formative assessment.
- Staff have access to and training on a wide range of instructional technologies and software resources for use across a variety of settings (in person, hybrid, virtual).
- All students have access to rigorous curriculum, with a full continuum of services and programs, in the general education setting.
- Teachers use student data to select and implement evidence-based teaching and learning strategies.
- Schools provide high-quality inclusive programs and activities based on high-leverage practices.

**Positive Behavior Supports and Social-Emotional Learning**

- Positive behavioral supports are a part of the school culture.
- Students learn tools and replacement behaviors for how to engage in the classroom and school productively and positively.
- Students feel safe in the learning environment.
- Teachers use appropriate language (verbal and nonverbal) and apply trauma-informed practices and appropriate de-escalation strategies.
- Expectations, routines, and procedures are culturally responsive, age appropriate, and posted and modeled in the classroom and school.
- Schools implement, and students are taught, restorative practices as alternatives to punitive disciplinary practices (e.g., suspension and expulsion).

**Individualized Education Program (IEP) Development**

- IEPs include goals designed to increase the amount of time students spend in general education settings.
- IEP teams use formative assessment to collect baseline data and monitor goal progress.
- Staff complete IEP documents to meet compliance requirements.
- Services are consistently delivered and documented according to required timelines.
- All IEP team members participate actively to make informed decisions.
Students are active participants in their IEPs.

**Individualized Supports**

- Teachers design, provide, and assess the effectiveness of specially designed instruction and adjust delivery as needed.
- The Assistive Technology (AT) evaluation team matches the appropriate AT/Augmentative and Alternative Communication (AAC) tools to student need and trains staff on implementation.
- Appropriate classroom accommodations and modifications are provided so that students can access grade-level content.
- There are opportunities for teachers and related service providers to model skills to students.
- Related services and behavior supports are individually designed, implemented, and monitored to align to student need and desired outcomes.
- Students with disabilities are provided appropriate instruction in career development and opportunities to participate in work-based learning.
- Schools use a student-centered planning approach and incorporate family input.

**Recommendations and Action Steps**

1) **Multi-Tiered System of Supports**

- **Re-familiarize all staff with MTSS Guidance.** Provide comprehensive training sessions on the MTSS Guidance to ensure all staff members are familiar with them; create an online resource center with detailed information on the MTSS Guidance that staff members can access at any time.

- **Engage in professional learning on MTSS.** Offer professional development opportunities that specifically focus on MTSS for all school levels, interventions, and its implementation; provide resources and tools for teachers to conduct self-reflection and self-evaluation on their implementation of MTSS.

- **Expand Universal Screening tools.** Research and purchase evidenced-based universal screening tools for academics, including dyslexia and behavior. Ensure the tools are readily available to all schools, especially the elementary level.

- **Constitute a District-Wide MTSS Leadership Team.** Develop a district-wide MTSS leadership team to including representation of all staff and support personnel (central office staff, school-based administrator, general ed teacher, special ed teacher, support personnel, school psychologist, school social worker etc.) and meet monthly to ensure fidelity to the process and consistency across the District. Create an MTSS Continuous Improvement Plan which will span a 3-5 year period and include measurable goals, objectives, timelines, and staff responsibilities. Review and monitor the Continuous Improvement Plan on an on-going basis.

- **School-Based MTSS teams.** Mandate all schools to operate a school-based MTSS team to support data-based decision-making for all aspects of academic and behavioral decisions and develop consistency between schools. Require each school to include an MTSS goal in their School Improvement Plan. Ensure school-based administrators schedule time for teams to discuss the data-based decision-making model to include reviewing progress monitoring, intervention data, and assigning staff for intervention time.
• **Expand Interventions.** Research and purchase additional evidenced-based reading, math, and behavioral interventions. Ensure all schools have access to each intervention in their toolbox to meet the needs of all students requiring additional intervention.

• **Staff for Interventions.** Provide dedicated intervention staff. Ensure special educators will no longer be removed from their case management responsibilities to deliver reading, math, or behavioral interventions. If special educators deliver interventions, adequate staffing at the school level must be required.

2) **Identification Practices and Disproportionality Monitoring**

• **Track disproportionality in disability identification.** At least quarterly, use the risk ratio to measure the identification rates of students with IEPs by race/ethnicity and other important indicators, such as language status, free and reduced lunch status, giftedness, etc., to identify any student group which is two times more likely than their peers to be identified as being over-identified (i.e., risk ratios).

• **Track activity timeliness.** Analyze timelines to assess if there are delays in providing interventions, delays in determining inadequate student progress, delays in initiating a special education evaluation (based on data), and evaluation completions.

3) **Inclusive Practices**

• **Create an inclusive education framework.** Develop and use a structured framework/model that will help promote and support the implementation of best practices for inclusive education including the provision of high yield collaborative teaching, specially designed instruction and related services.

• **Develop an inclusive education implementation guide.** Develop a clearly articulated district/school implementation guide based on the inclusive education framework with expected guidance, procedures and practices.
  o Determine the role of schools to adapt the framework to their unique needs versus District requirements.
  o Establish a maximum student classroom ratio for students with and without disabilities for general education and monitor the ratio to ensure these configurations do not stray from the standard so that SWD do not comprise the majority of students on the class roster.
  o Establish written guidance for the use of inclusive master school schedules, which establish common planning time for collaborative teaching, co-teaching, and other activities for general educators with special education and other personnel. Develop various scheduling models that schools could use and/or adapt.

• **Hire a professional consultant and develop model classrooms.** Hire a nationally known consultant with a reputation of fostering a learning environment of inclusion, building an inclusive practices framework and solidify co-teaching in the general education classroom starting with model classrooms at the elementary level in addition to working at all levels to improve services. Build model co-teaching classrooms starting at the elementary level based on expressed desire from school-based administrators who want to build inclusive learning environments at their campus. Support these school(s) with additional staffing, resources, professional learning, and central office staffing. These schools can be used as model sites for other building teams as they begin building more inclusive practices.
• **Professional development.** Provide professional development on collaborative teaching, co-teach to ensure teachers engage in a true instructional partnership. Provide planning time for general education and special educators and others to become true collaborative partners.

• **Redesign Resource Models.** Create one structured resource model providing intensive supplementary academic and social-emotional instruction in areas where students require additional support. Include services where students are given the opportunity to engage in flexible grouping to provide for example, supplementary instruction, reteaching, pre-teaching to achieve at high levels with a focus on grade level content. Additionally, use creative scheduling so students are not always pulled from the same non-academic classes (Art, Music, PE, Electives) as these classes play an important role in the development of all students.

4) **Specialized Programs**

• **Analyze current specialized programs.** Complete a deep analysis of all student profiles in each specialized program (i.e., Expressions, Pyramid, Learning for Life) and determine the appropriate placement based on area of disability, skill level, communication, assessment data, and student to staff ratios. After assessing student profiles, make any necessary changes to student placement and/or changing the trajectory of their instructional needs. Keep a focus on reducing student transitions for programming reasons and consider developing standards so specialized programs are not routinely displaced.

• **Restructure instructional models.** Based on this program review, analyze gaps in instructional needs, instructional materials, assistive technology, optimizing the learning space, and student to staff ratios etc., within and between programs.
  o Review feeder patterns and create or collapse classes where the need does not currently exist and may need to be reallocated elsewhere in the county.
  o Reconstruct with new models that collectively address all individualized student needs and through evidence-based adapted curriculum to align with grade level content, interaction with non-disabled peers and improve achievement and positive behavior along with social-emotional wellbeing.
  o Develop a walk-through rubric to conduct fidelity checks on a regular basis by school administrators along with central office personnel initially to establish inter-rater reliability. Focus areas should include the physical environment, direct instruction, differentiated lessons, assessment, and data collection, management of student behavior, communication, and collaboration. This tool can also serve to evaluate teacher effectiveness as well.

• **Define and expand services for high functioning students with autism.** Analyze current student functioning levels to determine which students require this highly customized service model, create a profile of a student with high functioning autism, and develop and administer the necessary support and programming for this student group to function successfully in the general education setting. Both academic and social-emotional learning should be integrated into programming considerations for this model to be effective.

• **Research and purchase adapted curriculum.** Investigate additional curricular materials for specialized programs. These classrooms require evidenced based content curriculum for all levels of adapted curriculum classrooms to include reading, math, history, science, and social-emotional learning etc. Learning materials and other resources should be allocated by student need and not limited to any specific program.
• **Expand home school and continuity of specialized programs availability.** Examine the locations of current specialized programs and the opportunities to expand placement in additional feeder patterns to better serve students closer to their home school.
  o Develop continuity of specialized programs across grades in a school to limit student transitions.
  o Establish guidance regarding:
    ▪ Transportation ride times of no more than an hour each way, except in extraordinary circumstances
    ▪ Clear decision protocols, decision-making authority, and communication protocols for when programs need to be added or moved.
    ▪ An expectation that programs remain in school buildings unless there are extenuating circumstances requiring a change (such as a school building opening or closing).

5) **Behavior Support**

• **Provide behavior support training.** Provide staff with a variety of trainings based on needs to include how to de-escalate students, conduct a Functional Behavior Assessment and Behavior Intervention Plan, and school-wide PBIS.

• **Conduct behavior assessment and planning.** Require all students with disabilities having social-emotional and behavioral goals in their IEP to have a Functional Behavior Assessment (FBA) and Behavior Intervention Plan (BIP) completed with ongoing check-ins at least every 6-weeks using multi-disciplinary teams.

• **Staff for behavior support.** During regional team development, include a behavior specialist to support students with disabilities in general education classrooms.

6) **IEP Development**

• **Provide training and guidance.** There were several areas noted that will support staff in developing quality IEPs with consistency and will require training in the following areas.
  o **PLAAFP.** Ensure all staff know how to include all necessary information and data when developing the present levels in the IEP to drive goals and objectives.
  o **Measurable goals.** Support staff in understanding how to write SMART goals so all staff use this format when developing IEPs.
  o **Accommodations/Supplementary Aids.** Provide training and support regarding what accommodations and supplementary aids students need to access the curriculum so IEPs are individualized and able to be implemented with fidelity.
  o **Services.** Ensure all services including consultation are included on the services page to portray transparency to parents of detailed service entries in the IEP.
Leadership and Organization

**GOAL**
To support students with disabilities through the increased collaboration and ownership of school administrators and staff, clearly defined roles, and a strategic vision.

**RESEARCH TO PRACTICE**
The commitment of those in leadership roles, and how leaders work together in collaboration, can fundamentally impact the success of students with disabilities in schools. Leaders must establish a vision and organize resources to increase the expectations of students with disabilities by presuming competence and incorporating culturally relevant, growth-oriented practices.

Tenets of high-quality leadership and organization structures include the following elements. Through this review, PCG assessed FCPS against these elements and provides recommendations in areas that require additional improvement.

**Vision and Strategic Plan**
- Special education initiatives are embedded in the district’s strategic plan.
- The special education department has a clearly articulated and well-communicated vision, mission, and action plan with goals for three to five years, and schools have specific goals that are aligned to the plan.
- The district engages in a continuous improvement review process at least every five years to assess the effectiveness of its special education program.
- Central office staff across departments and school-based leaders are held accountable for consistently implementing special education policies and procedures.

**Shared Accountability**
- Leaders guide staff toward a common vision and values and embrace the principle that holding all students to high expectations is the shared responsibility of all staff.
- Leaders empower students, staff, parents/families, and the community to share responsibility for teaching, learning, and student outcomes.
- Leaders model reflection by testing assumptions, learning from data, and adjusting instructional practices accordingly.
- Leaders emphasize that building a shared responsibility for student learning is an ongoing, continuous process.

**Team Building**
- In partnership with staff and community stakeholders, leaders create a vision for team collaboration and partnerships.
- Leaders develop a plan for communicating the vision with staff, families, and the community to gain support and buy-in.
- Leaders equip staff with effective team communication strategies including developing goals and facilitating open communication and building trust.
- Staff celebrations are openly shared and discussed at staff meetings, within professional learning communities, and during one-on-one check-ins.
- Leaders model the norms of collaboration, including paraphrasing, posing questions, providing data, and presuming positive intentions.
Student-Centered Decision Making

- Leaders create a culture of data-centered decision making using formative assessment.
- Leaders share beliefs with staff that all students have potential to succeed and improve, and that all staff are responsible for providing the appropriate supports and services.
- Leaders equip staff to develop student-centered classrooms, which includes planning, implementation, and assessments.
- Classrooms allow student input and participation in the decision-making process.

Collaboration

- Leaders intentionally design schedules and provide professional learning opportunities that promote collaboration between educators, related services providers, and paraprofessionals.
- Leaders support meaningful collaboration with families and train staff on how to schedule, organize, and facilitate an effective meeting with professionals and families.
- Leaders use positive verbal and nonverbal communication, encouraging the sharing of multiple perspectives, demonstrating active listening, and soliciting feedback from staff, stakeholders, and community partners.
- Staff are trained to apply collaboration strategies such as sharing ideas, active listening, questioning, and problem solving.
- Special education leaders are part of the district leadership team and collaborate with other departments.

Recommendations and Action Steps

7) DSE Organization

- **Special education director.** Work toward eventually appointing one special education director for the DSE to streamline communication and enact the department’s vision, in coordination with the Associate Superintendent for Special Education and Student Services.
- **Redesign the DSE organizational structure.** Enact the recommended DSE organizational revisions listed in the Leadership and Organization chapter above, including establishing regional school support teams aligned to feeder patterns and adding inclusion specialists, behavior specialists, and IEP Facilitators. The following description serves as a model organizational structure. It is designed to drive elevating the instructional rigor and high expectations for students with disabilities in FCPS and is aligned with the recommendations in this report.
  - **School Support**
    - Develop five regional school support teams. These teams would each serve on average 14 schools from two feeder patterns across grades K-12.
    - Each regional school team should consist of the following roles:
      - Supervisor
      - Coordinator for Inclusion and In-Class Collaborative Instruction
      - Instructional Specialists (elementary and secondary)
      - Inclusion Specialist
      - Reading Specialist
      - BCBAs (beyond specialized program specific support)
      - IEP Facilitator
      - Specialized Program Specialist
FCPS may also want to align related service providers and ACTT team members with regional teams as well. This team would work as a unit to support their assigned schools.

○ **Central Office**
  - Assign supervisors to the following functions and determine the appropriate number of coordinators/specialists needed to drive the vision and coordination of these areas districtwide.
  - Districtwide Instructional Initiatives include:
    - Inclusive Practices and Professional Learning
    - Related Services, ACTT, and APE
    - Behavior
    - Specialized Programs
    - Early Childhood and Child Find
    - Section 504 and Nonpublic
    - Operations (Compliance, Data, Technology, and Finance)

○ **In-School Support**
  - Over time, expand the role of the Special Education Program Coordinator (currently dedicated to school-based specialized programs) to support all students with disabilities in the school. Ensure each school has a dedicated school-based coordinator and/or department chair to coordinate and manage IEP meetings. This role could be split between schools if needed.

### 8) Strategic Vision

- **Vision and Action Plan.** Develop a vision and long-term action plan for the DSE that incorporates the recommendations in this report and those of the Blue Ribbon Task Force.
Family and Community Engagement

GOAL
To embrace family and community partnerships in order to make informed decisions and provide equitable opportunities for all students.

RESEARCH TO PRACTICE
Family engagement is a collaborative and strengths-based process through which education professionals, families, and children build positive and goal-oriented relationships to support the needs of students with disabilities and increase student outcomes.

Tenets of excellent family and community engagement include the following elements. Through this review, PCG assessed FCPS against these elements and provides recommendations in areas that require additional improvement.

Communication

- Staff communicate and work effectively with families.
- Staff support families through their child’s transition between grade levels.
- Families receive required notifications and invitations, and they attend meetings.
- Staff are skilled in communicating effectively with families about their child’s disability.

Collaboration

- Families are included in the development of school materials, with attention paid to language and culture.
- High percentage of families of students with disabilities are active in the parent-teacher organization.
- Family input and needs are collected through a variety of data-collection tools.
- Families of students with disabilities are involved with the school community activities.
- Concerns of parents/families are resolved in a timely manner.
- The district has a special education parent/family advisory group.

Resource Center and Training

- A family resource center, with staff skilled in special education, is available to all families.
- Staff receive training on working in partnership with families.
- Training for families on the IEP process is provided.

Access

- Families receive IEP documents (e.g., progress reports, meeting invitations, prior written notices, and procedural safeguards) in their native language.
- Families receive information in multiple formats, including electronically.
- Virtual IEP meetings and electronic signature functionality are available.

Community Partnerships

- The district forms partnerships with community colleges, local businesses, and nonprofit organizations to create work-based training and employment opportunities for students.
- The district leverages community partnerships and expertise to complement the academic curriculum with real-life experiences.
- The district understands the community resources to support families.
Recommendations and Action Steps

9) Report Recommendations

- **Implement and publicly report recommendation progress.** In order to build community trust, implement the recommendations in this report, develop an action plan and publicly report measurable progress at least twice per year on progress made or obstacles/delays encountered.

10) Advocacy Centers and Parent Training

- **Create parent advocacy center(s).** Provide support, training, information and best practices for parents through the advocacy center(s), making them integrated and accessible within each feeder pattern (inclusive of all schools).

- **Parent training plan.** In consultation with representatives of parent support groups, develop a training plan for families in the areas of IEP process, role of the child study team, helpful hints for parents at home, and how families can take an active and collaborative role at IEP meetings.

11) Website

- **Update and expand website resources.** At least annually, review and update materials posted on the FCPS website regarding special education instructional models, related services, and supplementary aids and services. Ensure this information is clearly accessible and comprehensive and accessible to parents with diverse linguistic needs and sensory limitations.

Human Capital

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**GOAL**

To invest in people from recruitment to retirement, ensuring highly qualified and effective staff have the skills/training needed to provide services and support to promote the success of diverse learners.

**RESEARCH TO PRACTICE**

If educators are not supported in modifying their practice nor given the tools needed to safeguard their well-being, then aspirations around more inclusive, supportive, strengths-based environments will never come to fruition.

Tenets of effective human capital practices include the following elements. Through this review, PCG assessed FCPS against these elements and provides recommendations in areas that require additional improvement.

**High-Quality Staff**

- Staff hold full credentials/licensure and advanced degrees, micro credentials, or skills in specific content areas.
- Staff are experts in working with students with and without disabilities.
- Staff collaborate with specialized instructional support personnel as needed.

**High-Quality Professional Learning**

- Administration prioritizes professional learning (PL) through effective scheduling.
- PL activities meet the needs of staff in their roles.
PL activities are embedded and include classroom observations, peer observations, and self-check inventories.
PL is aligned with evidence-based and promising practices, and with state mandates.
Support staff receive appropriate training to support student academic and behavioral needs.
PL includes a balance of instructional and special education specific topics.
Universal and targeted supports and coaching that include synchronous and asynchronous opportunities through virtual, face-to-face, or blended formats.

**Equitable Recruitment Practices**

- Advertising for diversity occurs through professional organizations, and job listings and websites contain affirmative action policy statements.
- Targeting recruitment activities to underrepresented populations occurs through continuously recruiting (even when there are no openings) and using a diverse hiring committee.
- Organization offers compensation (or other benefits) for participation in diversity recruitment and community outreach endeavors, including participation in conferences, committees, or coalitions related to diversity and the reduction of disparities.

**Staff Wellness and Self-Care**

- Individual and collective self-care is encouraged and contributes to an overall culture of well-being.
- Schools/districts sponsor resources or activities for staff, such as health assessments, physical activity opportunities, substance abuse prevention, and an Employee Assistance Program.
- There are adopted policies that encourage wellness and support a healthy school and district environment.

**Flexible Career Pathways and Staff Retention**

- Opportunities for growth, additional training, and career advancement are publicized.
- Mentorship programs are available for all staff.
- There is an ongoing staff evaluation process that incorporates multiple data points, such as classroom observations, student growth measures, IEP implementation, and personal goals.
- Staff are involved in student-centered activities or participate in at least one school or district committee annually.
- Difficult-to-staff schools or districts have an incentive pay structure that rewards new teachers with a graduated sum of money for each year they return.

**Recommendations and Action Steps**

**12) Staff Wellbeing**

- **Provide opportunities for peer coaching and mentoring.** Develop ways in which teachers can provide coaching and mentoring support to each other, especially for new teachers.
- **Show appreciation for staff.** Invest in special opportunities to thank staff, such as hosting special breakfasts, offering free or reduced cost wellness classes (e.g., yoga and meditation), etc.
13) Professional Learning

- Professional development plan. Develop a robust, multi-year professional learning plan based on the needs identified in this report targeted to different audiences, e.g., general educators, special educators, related service personnel, paraprofessionals, parents, etc., and prioritize its implementation. Ground training in the Learning Forward Standards for Professional Learning and embed the following components:
  - Mandatory annual trainings. Determine which special education specific trainings principals, teachers, and other school-based staff are required to attend each year and develop a process to ensure this happens.
  - Cross-functional teams. Cross-train individuals from different divisions/departments to maximize their knowledge and skills to leverage their collective resources to provide direct support, mentoring, coaching, and technical assistance to principals and teachers.
  - High quality trainers. Ensure all trainers are knowledgeable and effective. Identify and use exemplary school-based staff in addition to others.
  - Access to differentiated learning and coaching. Differentiate professional learning according to each audience’s skills, experience, and needs. Have professional learning and technical assistance continue for new personnel and those needing additional support.
  - Multiple formats. Use multiple formats (e.g., videos, webinars, and narrative text) and presentation approaches (e.g., school-based, small groups). Continue to build out blended learning opportunities so that all staff can more easily access the content.
  - Exemplary implementation models. Identify and share districtwide best practices that demonstrate high expectations and effective implementation to ensure they include students with IEPs, etc. Encourage staff to visit exemplary schools and set aside time for that to happen.

Systems and Structures

**GOAL**

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

**RESEARCH TO PRACTICE**

Operational excellence is demonstrated in several ways. It is shown through adherence to sound financial practices and to continuous, data-driven improvement.

The support of effective systems and structures include the following elements. Through this review, PCG assessed FCPS against these elements and provides recommendations in areas that require additional improvement.

**Equitable Funding and Staffing**

- The equitable distribution of school-based special education funding is based on the resources used to serve students with disabilities, such as teacher or aide salaries and supplies, and takes into consideration the varying costs that depend on type of disability, placement, and student need.
- Administrators take proactive steps to coordinate funding of special education services within the larger school program.

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5 Retrieved from [http://www.learningforward.org/standards#.UMvVD7Yt0kU](http://www.learningforward.org/standards#.UMvVD7Yt0kU)
IDEA grant expenditures are tracked and intentionally tied to specific programmatic goals. Staffing ratios support an inclusive instructional service delivery model and can be adjusted mid-year to accommodate changes in student need.

**Policy and Procedures**
- An electronic, user-friendly, and accessible special education policy manual for school teams and families exists on a publicly available site and is updated annually.
- Internal guidance and procedures are documented, accessible to all staff, and updated regularly.

**Data Quality, Culture, and Capacity**
- Benchmark, goal progress, and continuous progress monitoring provide timely information for programmatic and student-centered decision making.
- Dashboards are easily accessible to general education and special education staff, principals, and others so they can routinely monitor identification rates, placement levels, and discipline rates by school and grade.
- The district uses an electronic case management system to document provision of all special education services including progress, track IEP documentation for compliance, and provide access to indicators and other data for monitoring and trend analysis.
- School and district staff are well versed in the State Performance Plan (SPP) indicators, have easy-to-use reports to monitor them, and conduct data reviews of progress.
- Staff receive training on how to use data systems to make decisions.

**Recommendations and Action Steps**

**14) Written Procedures**
- **Review and edit current procedures.** Streamline procedures and clarify guidance for special educators to build consistency throughout the District. Ensure that all staff know where to access this and can use it on a regular basis. This should also be reviewed and updated so staff know where to go for updates on changes to systems, policies, and procedures.

**15) Online IEP System**
- **Investigate purchasing a new online IEP system.** Explore options for streamlining the IEP development process and improve efficiency through the use of more effective technology, thereby taking the burden off teachers for extensive or redundant paperwork. Prioritize tools with parent portal capabilities and the ability to translate IEP documents into parents’ native languages to enhance parent engagement and communication.

**16) Staffing Allocations**
- **Conduct a Workload/Time Assessment Analysis and Determine Appropriate Staff Allocations.** Conduct a workload/time assessment of special education teachers and review different models to support, for example, a 4:1 schedule so special education teachers have one full day per week to complete paperwork tasks, or other ways to support providing time to complete paperwork tasks efficiently. As part of this analysis, map the time spent conducting various activities (e.g., IEP writing, parent communication, data entry, service delivery, etc.). Reallocate staffing in alignment with these findings.
• **SEIA Allocations.** Consider restructuring the current formula for SEIA allocations and convert these positions into licensed, highly qualified special education teachers to reduce caseload numbers and support a collaborative/co-teaching model with fidelity. Alternatively, should teacher positions go unfilled due to staffing shortages nationwide, provide extensive training and coaching support to SEIAs.
V. Appendix

Learning Environment and Specialized Services Resources

- Instructional Briefs, Progress Center – Promoting Success for Students with Disabilities: https://promotingprogress.org/resources/instructional-briefs
- The Role of Special Education Services in an Equitable Multi-Level System of Supports, Wisconsin Department of Public Instruction: https://files.eric.ed.gov/fulltext/ED609668.pdf
Frederick County Public Schools

Executive Summary: Special Education Review

Leadership and Organization Resources

- Administrator of Special Education Professional Leadership Standards, Council for Exceptional Children: https://exceptionalchildren.org/standards/advanced-administrator-special-education-professional-leadership-standards

Family and Community Engagement Resources

- Office of Special Education Programs, IDEAS that Work: https://osepideasthatwork.org/federal-resources-stakeholders/family-engagement

Human Capital Resources


- Strategies to Build a Sustainable Special Education Teacher Workforce, National Council on Teacher Quality: [https://www.nctq.org/blog/Strategies-to-build-a-sustainable-special-education-teacher-workforce](https://www.nctq.org/blog/Strategies-to-build-a-sustainable-special-education-teacher-workforce)

**Systems and Structures Resources**

- Data-Based Special Education Workload Staffing Analysis, Texas School Board Association: [https://www.tasb.org/services/student-solutions/workload-staffing-analysis.aspx](https://www.tasb.org/services/student-solutions/workload-staffing-analysis.aspx)
- ESC 20 – Special Education Resources and Staffing Allocations: [https://www.esc20.net/apps/pages/special-education-resources-staffing-considerations](https://www.esc20.net/apps/pages/special-education-resources-staffing-considerations)
- Improving Decision-Making for Impact: Important Considerations for Special Educators and Implementation Teams, Johns Hopkins School of Education: [https://education.jhu.edu/research/article/improving-decision-making-for-impact/](https://education.jhu.edu/research/article/improving-decision-making-for-impact/)
- Recommended Practices to Address Staffing Concerns, Inclusive Schools Network: [https://inclusiveschools.org/recommended-practices-to-address-staffing-concerns/](https://inclusiveschools.org/recommended-practices-to-address-staffing-concerns/)