

# Rhode Island Department of Education Office of Student, Community and Academic Supports

### School Support System Report and Support Plan

# Providence Public Schools May 2022

## SCHOOL SUPPORT SYSTEM A Collaborative System of Focused Monitoring

#### **Introduction**

The purpose of the School Support System (SSS) is to provide a means of accountability for delivery of programs and services for students with exceptionalities. The School Support System model is designed to promote the involvement of the whole school district, general educators as well as special educators and parents. It is designed to learn if the district meets the regulations and what effects programs and services have on student outcomes. Finally, the SSS develops a school support plan for training and technical assistance.

To accomplish this the SSS includes these components:

- <u>The Orientation Meeting</u>: The Rhode Island Department of Education (RIDE) staff meets the Local Education Agency (LEA) to plan the site review and identify issues or initiatives that may influence programs or service delivery.
- <u>Data Analysis Meeting</u>: The RIDE staff meets to review LEA demographic information on selected reports including: the state performance plan, census information, and information collected through record review, staff questionnaires and parent interviews. To ensure that the child is at the center of the study, all analyses begin with the child. Thus, a stratified random sample of students with IEPs is selected; the records of these students are reviewed; their parents, teachers and related service providers are interviewed, and their classrooms are observed. The result is an in-depth, unified examination of the actual provision of programs and services for students with exceptionalities. The RIDE staff compiles a preliminary summary of their analyses of this data.
- <u>Presentation by the LEA and School Site Review</u>: The on-site review begins with a presentation of programs by teachers and staff. The presentation provides the review team with general and specific information on delivery of programs and services to students. Following this presentation, on-site reviews to all schools are made. The team embers interview school administrators and teaching staff. Parents and central office staff are also interviewed. The team gather sufficient information and works with the LEA personnel to generate a report, covering the following:
  - o The district's compliance with the state and federal regulations, relative to the education of students with exceptionalities.
  - $\circ\,$  The quality and effectiveness of programs and services provided by the district.
  - $\circ \ \text{The need for professional development and technical assistance that will enable the LEA to improve programs and services.}$
- <u>The Support Plan:</u> The Ride team, LEA central office and building administrators meet to review the data and complete a report of results. The group designs a professional development/technical assistance support plan with timelines for implementation. This plan enables the school and district to correct areas of non-compliance and to strengthen promising programs and correct areas of weakness to improve services and programs for all students.
- <u>The SSS Report:</u> The report summarizes the findings from various data sources. The format of the report uses four divisions: Indicators, Findings, Documentation, and Support Plan. Indicators describe either performance/result or compliance in the topical areas of Free and Appropriate Public Education (FAPE) in the Least Restrictive Environment (LRE), Evaluation/Individual Educational Program (IEP) and IDEA Transition. The documentation section of the

report distinguishes the source of the finding as compliance or result. The support plan reflects the response to the described findings. The support plan describes the corrective action by the district as well as resources and timelines to improve programs and services.

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- 1. Free Appropriate Public Education (FAPE) in the Least Restrictive Environment (LRE)
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- 3. IDEA Transition

## Providence Public Schools School Support System Review

#### **Record Review Team Leaders**

**Team A** - Susan Wood, Kerri Sorensen, Mary Spencer

**Team B** - Alice Woods; Gloria Amaral

Team C - David Sienko, Sandra Cambio Gregoire, Emily Klein

**Team D** - Jane Slade; Kerri Collins

**Team E** - Susan Wood; Mary Ann Mello

<u>Team F</u> - Susan Wood, Sandra Cambio Gregoire, Ruth Gallucci

The RIDE, Office of Student, Community & Academic Supports School Support System process was facilitated to provide a means of accountability for delivery of programs and services to improve outcomes for students with disabilities. The following pages reflect the findings of that process.

#### 1. FREE APPROPRIATE PUBLIC EDUCATION IN THE LEAST RESTRICTIVE ENVIRONMENT (FAPE/LRE)

Indicator		Findings	Support Plan
Result	1	Least Restrictive Environment Data (State Performance Plan Indicator #5)	The Breeding of Bubble Colored Consider
		Based on the FY July 1, 2020 – June 30, 2021, State Performance Plan information on Providence Public Schools Placement is as follows:	The Providence Public Schools Special Education Department is currently reviewing special education programming and the terminology used to describe programming
		The percentage of students educated 80 to 100% of the time in general education settings is 62.18% (RI District Average is 71.65%)	options to ensure access to the least restrictive environment, a committed focus on effective teaching and learning and best
		The percentage of students educated less than 40% of the time in general education settings is 18.88% (RI District Average is 10.87%)	special education practices, and clear and consistent program names to support parent, teacher, and student understanding of
		The percentage of students educated in private separate schools, homebound/hospitalized and private residential schools is 7.31% (RI District Average is 5.58%)	program placement options. In addition, staff to student ratios and class sizes are under review.
		The Providence Public Schools Special Education Department is currently reviewing special education programming and the terminology used to describe	Timeline: Ongoing
		programming options to ensure access to the least restrictive environment, a committed focus on effective teaching and learning and best special education	Progress Check: May 2023
		practices, and clear and consistent program names to support parent, teacher, and student understanding of program placement options. In addition, staff to student ratios and class sizes are under review.	FOLLOW-UP FINDINGS:
		In addition, to support this work and to ensure that there is effective oversight of all special education services across the district, the special education department is being reconfigured to include:	
		<ul> <li>Special Education Program Manager &amp; Instructional Coach: Specialized Instruction and Dually Identified Students</li> </ul>	

		<ul> <li>Special Education Program Manager &amp; Instructional Coach: Exceptional Child Services and Autism Programs</li> <li>Special Education Program Manager &amp; Instructional Coach: Behavioral Supports</li> <li>Special Education Program Manager: Related Services</li> <li>Manager of Specialized Instruction and Service: Preschool (2 positions)</li> <li>Manager of Specialized Instruction and Services: Elementary Schools (2 positions)</li> <li>Manager of Specialized Instruction and Services: Middle Schools</li> <li>Manager of Specialized Instruction and Services: High Schools (2 positions)</li> <li>To support consistent practices, procedures, and protocols across the district, PPSD has drafted a comprehensive Special Education Guidebook that will serve as a resource for policies, protocols, and practices in identifying and placing students with IEPs.</li> <li>Documentation: Data Analysis; State Performance Plan</li> </ul>	
Result	2	Participation and performance of children with IEPs on statewide assessments (State performance Plan Indicator #3):  B. For the 2018/19 school year, the last year in which state assessment data are currently available, the participation rate for children with IEPs in state assessments for Providence is 95% for ELA and Math (Science not reported).  C. Proficiency rate on state assessments for children with IEPs:  ELA: 1 (not meeting expectations) =1,370, 73% of students with IEPs 2 (partially meeting expectations) =437, 23% of students with IEPs 3 (meeting expectations) =64, 3% of students with IEPs 4 (exceeding expectations) =1472, 78% of students with IEPs  2 (partially meeting expectations) =1472, 78% of students with IEPs 2 (partially meeting expectations) =374, 20% of students with IEPs 3 (meeting expectations) =33, 2% of students with IEPs 4 (exceeding expectations = 5, less than 1% of students with IEPs  Science: 1 (not meeting expectations) =474, 62% of students with IEPs	Please see Support Plan in item #3 of this Section as it is applicable to this data in terms of working to close achievement gaps and improve outcomes for students with IEPs.  Timeline: Ongoing  Progress Check: May 2023  FOLLOW-UP FINDINGS:

		2 (partially meeting expectations) = 268, 35% of students with IEPs 3 (meeting expectations) = 15, 19% of students with IEPs 4 (exceeding expectations) =2, less than 1% of students with IEPS	
		<u>Documentation</u> : Data Analysis; State Performance Plan	
Result	3	Multi-Tiered System of Support (MTSS) Response to Intervention (RTI)/Academics  MTSS, including RTI for academics, has traditionally been provided under an autonomous school model. However, there are plans to provide a more unified district wide approach to MTSS next school year. Below is a description provided from each school that was visited by RIDE as to how the MTSS team operated within their school.  Elementary Level  Fogarty: At Fogarty, starting right from the beginning of the year, teachers engage in data meetings and are constantly monitoring student progress in the areas of ELA, Math, SEL, etc. Teachers use the Fogarty MTSS Referral Form to refer any child who is below grade level to the MTSS team. This form includes data, a narrative, and any other pertinent information about the student and their current level of functioning. Once the form is submitted, it is routed to the appropriate staff member via the MTSS chair (the Reading coach, Math coach, school social worker, etc.). That staff member meets with the referring teacher to create a Tier 2 plan for the child, model the suggested intervention, answer any questions, and provide a copy of our Tier 2 intervention data collection sheet. Once that plan is created, the MTSS chair schedules an MTSS meeting for 6-8 weeks out. The attendees at this meeting include the MTSS chair, classroom teacher, an ELL representative if applicable, math coach, reading coach, Assistant Principal, social worker, school psychologist, and grade-level special education resource teacher. The data is analyzed by the team, and a determination is made for the next steps for the child. All meeting notes and next steps are captured in the MTSS Spreadsheet. Based on the next steps, parents are notified, the classroom teacher may continue providing Tier 2 interventions, the special educator may begin providing Tier 3 interventions, etc. No matter the outcome, an additional MTSS meeting is scheduled to go over data, and potentially refer the child for special education if adequate	Academic interventions will be vetted and procured. Staff training in these interventions will also take place as appropriate. Special education leadership will continue to collaborate with ongoing MTSS efforts in the district for robust implementation of necessary infrastructure and data use within a MTSS framework. (See also Section 3, item #7: Consolidated Resource Plan (CRP).  Timeline: Ongoing  Progress Check: May 2023  FOLLOW-UP FINDINGS:

Fortes/Lima: The Multi-Tiered System of Support at Lima includes the Safe and Caring, ILT, Attendance Team, and special education, and grade-level teams. These teams obtain data from a variety of sources (ex. Office Discipline Referrals, BIMAS, Star, ENIL, RICAS, SurveyWorks, Attendance, social and developmental histories, and behavior scales) to assess strengths and needs, make decisions regarding interventions, and to monitor progress. Once teachers have identified that a student who needs academic and/or behavior support, they begin intervening (ex. small group instruction and check-in/check-out). They engage in monitoring the student's progress using academic and/or social-emotional data. If a student does not make sufficient progress, the teacher then makes a referral to the RTI team by completing an initial MTSS referral. The referrals are filtered to the appropriate team to consult with the teacher (Attendance Team, RTI-Academic, RTI-Behavior, Wellness). The teacher is invited to an initial meeting with the team. Information is gathered, interventions recommended, and goals are developed. A progress monitoring meeting is scheduled in six weeks (when appropriate) to review progress and to determine if any changes need to be made to the student's intervention plan.

#### Vartan Gregorian:

Link to MTSS procedures:

https://docs.google.com/document/d/1TYKH1Cnmefq1GfvKkO6CleDK6vZn9ytDwEyFKGliVXA/edit#

#### West:

GJ West has a robust RTI process and team. The school processes academic referrals through the MTSS team which consists for 6 educators and the assistant principal. Behavioral referrals are reviewed through the Target Team which consists of the psychologist, social worker, guidance counselor and assistant principal. Both teams meet weekly to review referral, problem solve concerns and create plans for implementation.

Here are the procedures:

https://docs.google.com/document/d/1A1JX8dP6-- tWrWQmPgVhzmG-MAf16Y 5D-mu -fj7M/edit

- MTSS Procedures
- Target Team Procedures

#### **Pleasant View**

There is an MTSS team, and they meet every Tuesday. It is focused on both academic challenges and social/emotional behaviors. Strengthening Tier 2 supports has been a current focus. Bridges, Sadlier, Heggerty and "Do the Math" have been procured to assist with Tier 2 academic interventions. If it is academic needs, then they are assigned to a resource teacher for Tier 3 interventions. If it is social-emotional, then they are assigned to either the part-time school counselor or the social worker for interventions.

#### Martin Luther King

There is a MTSS team that meets twice a month. Interventions include Wilson Reading. The school counselor works with Tier 1 and Tier 2 and the social worker facilitates Tier 3 for social emotional challenges. Resource teachers provide Tier 3 academic interventions.

At the elementary level the resource teachers all have MTSS/Rtl caseloads, and, in many schools, they are the sole interventionist providing Tier 3 supports, leading to higher caseloads, with 'small groups' becoming larger groups. These MTSS/Rtl caseloads are not taken into consideration when looking at special education staffing numbers, only the IEPs numbers are reviewed. There appears to be a belief that special education teachers are the only staff members that can provide Tier 3 supports. Staff are looking to the district for district-wide MTSS PreK-12 alignment protocols as well as district-wide interventions.

#### **Middle School Level**

**Del Sesto:** At Del Sesto Middle School, the MTSS team meets weekly. The team is comprised of a special education collaborative coach, school administrators, guidance counselors, social workers, school psychologist as well general education teachers who may have referred students to the team. The team has a rolling agenda and reviews each case. MTSS tools and resources are shared with teachers. At the beginning of the school year, before school re-opening, training and information is provided to all staff to review the purpose and functions of MTSS. They are informed of the student referral process to the team.

Each member of the MTSS team has a group of students assigned to them and they collaborate to discuss the best strategies to support students assigned on their caseload. Each member of the team keeps a log of the

students they are supporting and reports each week on the progress made. If there are students who continue to struggle despite supports offered, the team reviews those cases and offers further recommendations. The team collaborates to collect data and monitor progress on an ongoing basis.

At DelSesto Middle School the MTSS Team reports that most students currently reviewed by the team present with social and emotional needs. The team has established structures for meeting and reviewing student information. The list of suggested interventions is limited and there does not appear to be a wealth of evidence-based practices in the team folder. This could be an area for additional training and technical assistance. As part of the MTSS Team the Family Liaison works closely with community-based programs, (Inner You, RI College School Counselor Program, etc.) to support student's SEL needs. The school has developed partnerships that have assisted students and families with counseling support.

**Greene**: At Greene, the Target Team meets weekly throughout the year. One meeting is held to review student needs before the start of school, after the first 20 or 30 days of school, and after the end of each quarter. The meeting(s) convened before or at the start of the new school year identify incoming students with risk indicators and discuss appropriate intervention strategies. During the school year, the Target Team meets weekly to discuss issues as they arise, monitor students' progress, and discuss ways to improve support for students showing symptoms of risk and the operation of the Target Team. This MTSS improvement plan relies on data to inform action. However, the Target Team members use their professional judgment to recommend specific student supports and interventions. To ensure that each tier placement is appropriate and practical, the team will continually monitor individual student response to assigned interventions and, when needed, revise student placement.

At Greene Middle School the Targeted Team meets weekly. There are two teams, one focused on attendance and one focused on academics. A building administrator leads each team. The teams have established protocols, minutes, and data tracking protocols. The teams use formative data, information from Power School, Skyward and summative data such as SurveyWorks to inform intervention practices. As with DelSesto Middle School, school leaders agree that broadening the menu of evidence-based interventions would benefit teachers with targeting interventions to support student's targeted needs.

At Greene Middle School there are a variety of student supports available including on-site support from the Providence Center, student assistance counselor and other community-based supports. This year four School/Community Specialist were added to the team in addition to four guidance counselors to address student SEL needs and coordinate services with parents. The School/Community Counselors implement restorative justice and justice circles, provide home visits, host monthly community meetings by grade and implement a school-wide point system to encourage a positive school climate.

This year at Greene Middle School a math and ELA coach was added to support teachers in targeting interventions and monitor student academic performance. They do not provide direct student interventions but support teachers through instructional coaching.

Prior to COVID Greene Middle School had a TST/MTSS Team which examined student data, met with teachers to target specific interventions, use short-cycle progress monitoring and review student progress. This team has not been re-established since COVID and it is unclear if the current Targeted Team is serving this purpose.

#### **High School Level**

#### Central:

At Central High School MTSS includes both academic and social emotional learning support using two intervention teams. The RTI team's initial focus was on 9th grade students since the research shows academic success and attendance during a student's freshman year is an indicator for high school graduation within four years. Thereafter, the RTI team expanded the intervention process to include all Central High School students by creating RTI plans in core classes. The RtI plans focus on having students who have incompletes and at risk of not receiving credit acquisition. In Quarter 1 (Q1) 79% of the 9th graders were on track (11 were students with IEPs). The district average was 76%. From Q1 to Q2 the focus was on math supports. In Q2, ELA was added and subsequently science and social studies. As of May 2022, two of the 11 students with IEPs are off their RtI plans and have no incomplete classes. In Q4, a tiered process was developed. Tier 1 is supports in the core class. Tier 2 is moving from off track to graduation track and Tier 3 students are taken out of failing classes and getting 1:1 support for that respective class.

Teachers reported this to be challenging as they feel that there is no district wide intervention programs or progress monitoring tool for academics.

Central High School also has 9th grade supports for math and ELA through AmeriCorps tutors. Tenth grade has writing support. Teachers expressed a need for district wide interventions in both ELA and Math beyond the core curriculum of Illustrative Math and Study Sync.

A second team which focuses on the social emotional needs of students is the Target team. Teachers and staff refer students to the team. Thereafter, the team collaborates with stakeholders including teachers, parents, and students in developing support plans. These plans not only help students make connections with counselors and mentors in the building, but also refers students to needed mental health and community resources. Lastly, Central offers a variety of programs for student and family engagement including after school programs, culture nights, talent shows, sports, and the integral Central Cares program. Central Cares supports students and families' basic needs through a food pantry, clothing/coats, and hygiene products.

Both Mt. Pleasant and Central High School teachers reported that student attendance has been a significant issue coming back after COVID. There are community specialists (Central High School has two, Mt. Pleasant has six) and one district wide truant officer who works with students on school attendance but given the large numbers of chronically absent students it has been overwhelming. Truancy Court is no longer happening, and both general and special educators reported that the use of Truancy Court had an impact in reengaging students in school as well as getting potential needed services directed by court.

#### Mount Pleasant High School (MPHS):

MPHS Solution Team

Team Purpose: The MPHS Solution Team is a referral-based, data driven, and evidence-based team that creates targeted intervention for students struggling with social emotional health, behavior, and attendance. It aims to provide a system of support and accountability for students and staff while measuring the effectiveness of referral process, and intervention strategies.

**Team Members:** 

- Grade-Level Assistant Principal
- Grade-Level Counselor

- Grade Level Community Specialist
- -Administrator Lead
- -Community Specialist Lead

Meeting Day/Time:

- 9th Grade: Mondays 2:20pm-3:35pm
- 10th Grade: Tuesdays 2:20pm-3:35pm
- 11th Grade: Wednesdays 2:20pm-3:35pm
- 12th Grade: Thursdays 2:20pm-3:35pm

Referral Process: Stakeholders will use Google Forms to refer students that need targeted intervention for social emotional health, attendance, or behavior. This form automatically populates to a confidential Solution Team Spreadsheet to manage the referral and intervention process, including recommendations and follow up. This Solution Team spreadsheet will be used in the oversight process to review the Solution Team's effectiveness, efficiency, and results. Oversight:

- School Counselors: School Counselors will meet with administration,
   The SMART Clinic, and Social Worker weekly to review Solution Team data
   and interventions
- Assistant Principals: Meet with the Principal weekly to review Solution Team data and interventions.
- Community Specialists: Community Specialist will meet weekly with the Senior Community Specialist to review Solution Team data and interventions. At MPHS there are fragmented structures of an MTSS framework and lack of academic interventions. In addition to the Solutions Team, there is a Target Team consisting of the social worker, Family Services of RI, guidance counselors, Smart Clinic staff, student assistance counselor, school psychologist, and administrator who meet bi-weekly to triage student cases. There is discussion to strategize more effectively with the two teams next year. It is unclear if there is a comprehensive early warning system to provide early identification for those students who are struggling.

A Smart Clinic though Providence Community Health is located within MPHS where students have direct access to nurses and other clinicians that can provide services to individual students who may be at risk.

#### **Providence Career and Technical Academy (PCTA):**

At PCTA there is a combination of three teams working to provide support to students:

1. An RTI/MTSS team that stays after school to provide support to teachers who have students who have behavioral challenges in their classes

Result	4	by offering best practice on how to support them. Teachers reported that the academic MTSS team was not active. There is a School to Career Coordinator who is point for the early warning system and any related supports. There is an attendance team that deals with attendance patterns and issues.  2. A wellness team that looks at acute behaviors and tries to provide support for students and teachers.  3. The administrative team that uses information from these two teams to better position students for success  All three teams will be merged next year to create the MTSS team.  Teachers at the PCTA, Central and Mount Pleasant High School reported that there are almost no intervention programs other than one that is self-directed (e.g., ALEKS). PCTA purchased an academic intervention program this year: Reading Plus and it is utilized in the hybrid classes. There is currently no math intervention program.  Teachers, in general, expressed a need for district wide interventions in both ELA and Math beyond the core curriculum as well as training on progress monitoring tools. (See also Sections 1, item #3: MTSS and Section 3, Item #7 CRP)  Documentation: Data Analysis; State Performance Plan  SPP Disproportionate Representation (State Performance Plan Indicator	
Result		#9 and #10)  Providence data does not demonstrate significant disproportionality, and the district does not have disproportionate representation by race or ethnicity for identification of children with disabilities.  Documentation: Data Analysis; State Performance Plan	
Result	5	Suspension (State Performance Plan Indicator #4a):	
		<b>Significant</b> discrepancy in the rate of suspensions (for students with IEPs) greater than 10 days as compared to the rate of suspensions (for students	

		without IEPs) greater than 10 days. This was not applicable for the Providence Public Schools as no students with IEPs were suspended for more than 10 days.  State Performance Plan Indicator #4b Providence Public Schools did not have: (a) a significant discrepancy, by race or ethnicity, in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs; or (b) policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.  Documentation: Data Analysis; State Performance Plan	
Compliance		At Greene Middle School there is an after-school suspension program (New Visions) which is focused on restorative practices. Students with IEPs reaching 10 days of suspension are not consistently provided with a manifestation meeting (DS1, DS2). Teachers (case managers) are not notified consistently when a student with an IEP is reaching 10 days of suspension (DS1, DS2) 3300.530(b) (1) (2)  Documentation: Data Analysis; State Performance Plan, Interviews	Professional development on manifestation determination will be provided to staff.  Timeline: Immediately and ongoing  Progress Check: May 2023  FOLLOW-UP FINDINGS:
Result	6	Multi-tiered System of Support (MTSS)/Social Emotional Supports/Social Emotional Resources/Positive Behavioral Supports  MTSS, including social emotional and positive behavioral supports, has traditionally been provided under an autonomous school model. However, there are several current interventions provided across the district along with providing a more unified district wide approach to MTSS next school year.  For example, the BIMAS screener is used across the district in October and March by classroom teachers as a universal screener to measure behavior and social/emotional learning skills. Data is uploaded and available to be analyzed at the district level, school level, classroom level and student level.	Interventions will be vetted and procured as appropriate and aligned to the priority needs. Staff training in these interventions will also take place as appropriate. The district continues ongoing work with an MTSS technical assistance provider from BRIDGE-RI to strengthen the full MTSS framework (See also Section 3, item #7: Consolidated Resource Plan (CRP).  Timeline: Ongoing  Progress Check: May 2023

School counselors were added to every elementary school during the 2021-22 school year. All elementary counselors use the Caring Schools Community Curriculum, which is an evidence based social/emotional curriculum based on the 5 CASEL Competencies, which have been adopted by PPSD. They currently provide supports at a Tier 1 level and support all classrooms (general and special education) in SEL, academics and career/college readiness across all school levels. They are also able to provide some small groups, time limited Tier 2 Interventions. Student Assistance Counselors also provide school-based supports to students regarding substance abuse and substance abuse prevention. Some grade level teaches have a grade level set of "Caring School Communities" and the expectation is that they will implement this curriculum, but counselors also create their own lessons. Some counselors expressed the need to have all staff trained on the "Caring School Communities." Data from the Behavior Intervention Monitoring System (BIMAS) screening is not systemically used to identify lessons that would be needed most.

At the middle level schools are using the Naviance Program for the development of ILPs for all students. The Career Development Plans for 14-year-old students are based on activities in the Naviance Program.

At the high school level there is no formal district-wide social emotional curriculum except for students in the Exceptional Children Services (ECS) who use the UNIQUE curriculum. Everything else is teacher generated. Teachers and staff expressed a great need for a formalized district-wide social emotional curriculum.

All school based mental health professionals across all school levels have been trained in and have access to the Zones of Regulation Curriculum, which is used as a Tier 2 Intervention. In addition, all staff have access to Quaver SEL, which is evidence based and aligned to CASEL. (Note: Quaver SEL is geared towards elementary school students but may also be appropriate for some special education classrooms).

At the Tier 2 and Tier 3 level, per the Nathan Bruno and Jason Flatt Act, PPSD has begun to implement a suicide based mental health curriculum for staff, in partnership with Bradley Learning Exchange and Family Service of RI. Staff are currently undergoing training in Mental Health First Aid and Columbia Screeners. Physical and Health Education teachers have also been trained in Signs of Suicide.

PPSD partners with Family Service of RI and Children's Youth Cabinet through the School Based Mental Health Collaborative to provide clinical mental health services to students in schools. Students are identified by MTSS student support teams, and funding is provided for uninsured and under insured students across the district. At George J. West, there is a partnership with Providence Center, which has 2 counselors located at the school. In preparation for next year, Integrated Behavioral Health Teams are being created in partnership with Rhode Island College and RIDE, train the trainer is underway in Cognitive Behavioral Intervention for Trauma in Schools (CBITS), including a Trauma Screener, is underway to identify students and provide interventions, and Act and Adapt, an evidence-based anxiety-based intervention on coping skills and managing stress, is in the initial planning phase as well. There is a district Behavior Team comprised of two psychologists and a social worker. They meet every Thursday and Friday morning. Their mission is to provide support, coaching and consultation to special education teams per request. School Removals/Disciplinary Policies. Throughout the district behavioral expectations along with disciplinary action protocols and policies are comprehensively defined in a student handbook. Documentation: Data Analysis; Document Review, Interviews; Observation Result/ **Special Education Vacancies** Human Resources in conjunction with special Compliance education administration has engaged in a recruiting blitz with incentives to fill critical Across the district the review teams met many hard-working and dedicated professionals whose commitment to students and families was very evident. need areas including special education and There are, however, approximately 71 vacancies in special education and related services. The approximate number of related services throughout the Providence Public School Department special education vacancies (as of August (PPSD). This, of course, significantly impacts the ability of schools and 2022) is 24 as opposed to the 71 at the time of programs to provide specialized instruction and any compensatory services. It the review was noted that PPSD does provide frequent coverage by its current teaching staff in their unassigned periods. Still the considerable number of vacancies Timeline: Immediately and ongoing creates an enormous and critical issue of service delivery not being provided per the IEP which compounds each week that the vacancies continue to be **Progress Check:** November 2022

empty (300.320). Please see the specific program continuum level (elementary, middle, and high) for specific vacancy information. The special education vacancies, at the time of the on-site review, are as follows:

#### **Special Education Vacancies by Grade Level**

#### Preschool (1 Total)

Two (.5) positions - Itinerant Early Childhood Special Education Teachers (IECSE)

#### Kindergarten (5 Total)

One position - Autism

One position - 1/2 day Behavior Intervention Program (BIP)

One position - 1/2 day self-contained

One position - Exceptional Children Services (ECS)

One position - Full Day Self-contained

#### **Elementary (11 Total)**

Four positions - Autism

Two positions - Behavior Intervention Program (BIP)

Two positions - Bilingual self-contained

Two positions - Exceptional Children Services (ECS)

One position inclusion

#### Middle - (17 total)

Two positions - Behavior Intervention Program (BIP)

Two positions - Exceptional Children Services (ECS)

Two positions - self-contained

Two positions - Full inclusion

One position - Inclusion (Teacher out on leave)

One position - Behavior Intervention Program (BIP)

One position - Self-contained

One position - Hybrid

Five positions - Inclusion

Special education administration has developed a comprehensive compensatory plan. They are now in the process of implementing it. There will be a special education manager dedicated to overseeing the compensatory plan.

#### **FOLLOW-UP FINDINGS**:

Timeline: Immediately and ongoing

Progress Check: May 2023

#### High School - (17 total)

Four positions - Exceptional Children Services (ECS)

Six positions - Inclusion

Five positions - Self-Contained (Departmentalized/Hybrid)

Two positions - Full Inclusion

Eight positions -School Psychologists

Four positions - School Social Worker

11 positions - Speech and Language Therapist (SLP). District wide (PK-12) there are 11 SLP vacancies, 5 of which are filled with vendors so 6 vacancies with no coverage

Two positions - Occupational therapy (OT).

<u>Documentation</u>: Data Analysis; Observation, Interviews

#### Result/ Compliance

#### Preschool Continuum

Currently, preschool classrooms for students with disabilities are located at Asa Messer, Carnevale, Fortes-Lima Martin Luther King, and Pleasant View. There are also state general early childhood preschool classrooms, which include preschoolers with disabilities, located in Fortes, Pleasant View, Kizarian, and Young Woods. PPSD provides early childhood special education and related services in the general early childhood environment using the Rhode Island Itinerant Early Childhood Special Education (IECSE) service-delivery model. This allows Providence's youngest learners to receive their specialized instruction in their LRE in the programs they would participate if they did not have a disability. According to the PreK Manager, Providence currently supports children using the IECSE model in district-based classrooms, as well as in thirty-two (32) community settings across the city, including Head Starts and early childhood programs with RI-PreK's.

This year, Providence had two itinerant early childhood special education (IECSE) teachers providing special education services to preschool students with IEPs across the 32 community-based early childhood centers. Sixteen of the 32 early childhood programs are Head Start and RI-PreK's serving over 1,000 children. Due to the nature of the IECSE support for children with all levels of need and the importance of collaboration with the early childhood teachers, the state recommends caseloads of 14 students, covering no more than 4-5 early childhood centers. It is unclear how many speech and language pathologists or occupational therapists provide services in the same program.

Providence is commended for sending multiple early childhood special educators and therapists to the RI-IECSE professional development and the ongoing community of practice and has many dedicated professionals providing services in general early childhood settings.

Special Education classrooms include integrated half-day classrooms, in which students with IEPs are integrated with typically developing peers, Self-Contained, Exceptional Child Services (ECS) and Autism Spectrum Disorder

Special education administration has developed a comprehensive compensatory plan. They are now in the process of implementing it. There will be a special education manager dedicated to overseeing the compensatory plan.

Timeline: Immediately and ongoing

Progress Check: May 2023

#### **FOLLOW-UP FINDINGS:**

PPSD will appropriately staff early childhood special education.

Timeline: Immediately and ongoing

Progress Check: May 2023

#### **FOLLOW-UP FINDINGS**:

Special education administration will provide professional development on evaluations process and protocols including the "waiving of evaluations".

Timeline: Immediately and ongoing

(ASD) classrooms, in which students with significant disabilities are provided intensive special education services and a Behavioral Intervention Classroom (BIP), in which students receive intensive behavioral support. District personnel, as well as student IEPs call for opportunities for inclusion in integrated classes, however, this strategy can make the class regulatory ratios of children with and without disabilities and total numbers askew. (See specific ratio information under Martin Luther King School and Pleasant View Elementary School below). This current procedure for including children from self-contained classes into integrated classes leads to regulatory compliance issues. (See specific compliance information under Martin Luther King School and Pleasant View Elementary School below).

There are location changes, school day, and ESL programming projected for the 2022/23 school year, along with a systemic review of all special education programming within the district.

The current classroom breakdown is as follows:

SCHOOL	PROGRAM	FULL/HALF DAY
Asa Messer	Integrated Pre-K	Half day
	Integrated Pre-K	Full day
	ECS Classroom	Full day
	ECS Classroom	Full day
Carnevale	Integrated Pre-K	Half day
	ASD Classroom	Full day
	ASD Classroom	Full day
Fortes-Lima	Integrated Pre-K	Half day
	BIP	Half day
	Self-Contained	Half day
Martin Luther King	Integrated Pre-K	Half day
	Integrated Pre-K	Half day
	Integrated Pre-K	Half day
Pleasant View	Integrated Pre-K	Half day
	ESL Integrated	Half day
	ESL Integrated	Full day
	Self-Contained	Full day
	ECS Classroom	Full day
	ECS Classroom	Full day

Progress Check: May 2023

#### Martin Luther King (MLK) Elementary School

The numbers for the PreK classes are:

#### PreK 1

Am class: 8 IEPs, 6 peers- out of compliance

Pm class: 4 IEPs, 6 peers

#### PreK2

Am: 9 IEPs and 4 peers- out of compliance Pm: 6 IEPs and 5 peers – out of compliance

#### PreK3

Am: 7 IEPs 5 peers- out of compliance 300.115(B)(3) Pm: 5 IEPs, 5 peers- out of compliance 300.115(B)(3)

All teachers and related service providers spoke about the increased social emotional and cognitive needs of the children. This year MLK has had no school psychologist although there were psychologists who did facilitate evaluations on their unassigned time. There is a full-time social worker. There is a part-time school counselor (3 days) who will be full time in the 2022-2023 school year. There has been no occupational therapist and no replacement was provided. (300.301-300.306)

The speech and language pathologist has had 20 initial referrals this year. Last year there were only ten. She has a caseload of approximately 57 children.

#### **MLK Integrated PreK:**

Five of the six classrooms are out of compliance with regulatory ratio requirements 300.115(B)(3).

**PreK1.** One student (RG12) has enhanced supports in her IEP and currently does not have any as the one enhanced staff (floater) is assigned to PreK3 due to the significance of behavioral needs there. Parents were asked to waive evaluations due to staffing shortages (RG 13, 14) are all students with IEPs who did not have individual evaluations being completed due to staffing shortages. RG15 was a determination of eligibility, however, the psychological was not done due to staffing shortages.

The numbers for the <u>Pleasant View Elementary School</u> PreK classes are: RI PreK (general education classes with itinerant special education service)

Class 1: 6 with IEPs, 14 without IEPs

Class 2: 7 with IEPs 13 without IEPs

Class 3: 7 with IEPs, 11 without IEPs

Class 4: 5 with IEPs 14 without IEPs

#### 1/2 day integrated

½ day integrated: 7 IEPs and 8 peers

½ day integrated: 7 IEPs and 7 peers- out of compliance [300.115(B)(3)]
½ day Integrated: 7 IEPs and 7 Peers- out of compliance [300.115(B)(3)]
½ day integrated 7 IEPs and 8 peers
Full day integrated 7 IEPs and 8 peers
Full day self-contained 10 IEPs
Full day IEPs 7 IEPs
ECS full day 9 IEPs

Two of the classrooms are out of compliance with regulatory ratio requirements 300.115(B)(3). As noted above, services and supports were not consistently implemented due to a variety of staffing and structural issues. (300.320) This year (2021-2022) Pleasant View had no school psychologist although there were psychologists who did facilitate evaluations on their unassigned time. There is a part-time school counselor and a full-time social worker pre-K-Grade 5. There was no occupational therapist (OT) at the PreK level until the third week of March when a contractor was hired. There are two physical therapists (PT). One has been out a month, thus far, and at the time of the review there was no coverage available. There is one PreK speech and language therapist and one contracted virtual PreK speech and language therapist that individual would have 82 children on her caseload.

All teachers and related service providers spoke about the increased social emotional and cognitive needs. In 2018-2019 the occupational therapist did 19 initial evaluations from early intervention. In the 2021-2022, she did approximately 50 (by the close of school year) with 80% qualifying. In the RI PreK, children are screened after they start the Pre-K class. If they fail the screening, they are then referred to the central office evaluation team for possible evaluation. The school-based teachers are then left out of the evaluation loop and the IEP writing process. Teachers were told they would be informed of when a child fails the screening, but they continue to be left out of the process. Teachers felt that due to the disconnect they are not using the MEPI system (Maturation, Environmental, Peer, Intensive or Intentional Interventions) which identifies the necessary goals, as well as skills that will likely be learned through maturation, the environment, or peer support alone. In three of four RI-PreK classes, many students have the need for enhanced staff in their IEPs. These positions (3 in total) were not filled for the entire year (the jobs were advertised/posted). (300.320)

Teachers (general and special) as well as related service providers spoke about not being able to meet the needs of the students with more significant needs in general education and feel that as it is currently being implemented, the model becomes a push in resource model. This then results in students moving into kindergarten needing more specialized services, support and structures. The concerns presented by the teachers align with the staffing challenges experienced by the district. Although RIDE continued to offer technical assistance, the workload of the early childhood manager and the overall lack of staffing made full implementation of the RI-IECSE model challenging. (300.320)

There are no substitutes/coverage for general education teachers to attend preschool IEP meetings. (300.321)

The larger playground is for ages 5-12. There are approximately 150 PreK children who do not have a formal PreK playground with accessible equipment. The district collects early childhood environment and preschool outcomes data on all children with IEPs as required by the federal Office of Special Education Programs.

#### Indicator #6

A. In this district, the percent of preschool children aged 3-4 with IEPs attending a general education early childhood program and receiving the majority of special education services in the general early childhood program was 52.11%, slightly lower than the state average of 54.60%.

\*Percentages appear to be inflated based on information gained about integrated classes that are out of compliance with ratios, which would change the class categorization to self-contained.

B. The percentage of children aged 3-5 with IEPs attending a separate special education class, separate school or residential facility was 19.47%, higher than the state average of 10.81%.

\*Percentages appear to be low based on information gained about integrated classes that are out of compliance with ratios, which would change the class categorization to self-contained.

#### State Performance Plan Indicator #7

**Statement 1.** Of the preschool children who entered the preschool program below age expectations, the percentage who substantially increased their rate of growth by the time they turned 6 years of age or exited the program:

- Positive social-emotional skills (including social relationships); 67.8%, in line with the state average of 67.7%.
- Acquisition and use of knowledge and skills (including early language/ communication and early literacy); 75% above the state average of 66.9%.
- Use of appropriate behaviors to meet their needs 78.6%, above the state average of 69.1%.

		Statement 2. The percent of preschool children who were functioning within age expectations in each Outcome by the time they exited the program were:  Positive social-emotional skills (including social relationships); 35.9%, below the state average of 47.8%  Acquisition and use of knowledge and skills (including early language/communication and early literacy); 25.9%, below the state average of 34.7%  Use of appropriate behaviors to meet their needs 44.7%, below the state average of 58.1%.  Documentation: Data Analysis; State Performance Plan	
Result/ Compliance	9	Program Continuum Elementary Level  There are 9,741 students at the elementary level and approximately 1,553 have IEPs. The special education least to most restrictive program continuum is as follows:  Resource: students receive special education support for the general education curriculum in the general educational setting. The special education teacher, related service provider and/or trained paraprofessional will service students in the general education classroom to provide direct instruction, instructional support, or other assistance to the student or a group of students.  Intensive Resource: students receive special education support for the general education curriculum outside the general education setting. When the services cannot be appropriately provided in the general education setting, the student may receive selected services s/he needs in a separate special education setting.  Bilingual/ESL Resource: students receive special education support for the general education curriculum in the general educational setting that is either within a dual language school or a bilingual classroom.  Co-teaching: students are serviced by a special educator in a push-in model for half of the school day; special educator spends one half of school day with one grade level and the other half with another grade level.  Inclusion: students are serviced the full day by a special education teacher working in a push-in model with the general education teacher.  Collaborative: students in grades K and 1 (only at Fortes/Lima) are in a smaller classroom of students with IEPs and general education students, with a dually certified teacher (general education and special education) and a teaching assistant. This model is being eliminated next year and will be replaced by Inclusion Classrooms.	Special education administration has developed a comprehensive compensatory plan. They are now in the process of implementing it. There will be a special education manager dedicated to overseeing the compensatory plan.  Timeline: Immediately and ongoing  Progress Check: May 2023  FOLLOW-UP FINDINGS:

**Behavior Intervention Program:** students are serviced across all content areas in a special education setting by a special educator teaching collaboratively with a general educator in English, Math, Science, and Social Studies, using behavioral strategies and social/emotional supports. Students access the general education classroom at their own individual level of success.

**Self-Contained:** Students are taught the general education curriculum in a multi-grade classroom by a special educator in a special education classroom, with inclusion opportunities.

\*Exceptional Child Services (ECS): students are taught modified Common Core Standards (Essential Elements) in a multi-grade classroom by a special educator with inclusion opportunities.

\*Autism: students are taught across all content areas in a special education multi-grade classroom with inclusion opportunities and a focus on supports for students with autism, such as Applied Behavior Analysis, discrete trial teaching, visual supports, Unique Learning and Activities of Daily Living skills (ADL). Students take the RICAS or the Alternate Assessment depending on their individual levels.

\*It is unclear why there is an ECS class title and then a separate Autism class title.

The breakdown for the schools that were reviewed is as follows:

School	Program
Fogarty	Resource K-2
	Resource 3-5
	Self-Contained 1-3
	Self-Contained 4-5
Fortes-Lima	Resource (1)
	ESL Resource (4)
	Collaborative K
	Collaborative 1
Vartan Gregorian	Intensive Resource (1)
	Self-Contained K-1
	Self-Contained 2-3
	Self-Contained 4-5
	Self-Contained 4-5

West	Intensive Resource (3)	
	Co Teach 2-3	
	Co Teach 4-5	

At **West Elementary School**, there is no occupational therapy (OT) to provide services or attend IEP meetings. Staff have been told to transfer OT goals to new IEPs, but no one providing services. (300.320). The program manager is working to try to fill vacancies and to provide compensatory services. A comprehensive compensatory services plan is under development. At West, there is also a lack of coverage, so special education teachers and teacher assistants are pulled to provide coverage for lunch or other needs. General education teachers do not have coverage to attend IEP meetings so teachers may Zoom into the meeting from their classrooms or may not attend. Parents are asked to agree to the excusal at the meeting, but written input from the excused teacher is not always obtained. (300.320 and 300.321). There is a problem getting substitutes district-wide, so if a special education teacher is out, there is often no substitute provided.

At Vartan Gregorian Elementary School, there is a building-based substitute that can be used as a substitute for special education teachers and to cover classes so teachers can attend meetings, although sometimes the resource teacher has to cover for a general education teacher for IEP meetings, so both teachers cannot be present at the meeting at the same time. At Vartan Gregorian, a student was supposed to have a one-to-one teacher assistant but has not had those services all year long (AW6). Students in self-contained classrooms are with their general education peers for physical education and recess and some teachers collaborate to create classroom buddies. Special education students have art, music, and library with students in their classroom only, due to the need for Covid 'pods.' General education teachers typically do not attend meetings for students receiving services in self-contained classrooms. Also, at Vartan Gregorian, staff reported that evaluations are not always completed in time for the previously scheduled evaluation team meeting. Then, the meeting may be rescheduled (that day), or the parent is asked to waive assessment. IEPs may be written more than once due to meeting rescheduling.

At **Fogarty Elementary School**, the occupational therapist (OT) left in mid-February, and it was not until April 29, 2022, that a contracted OT was brought in to facilitate evaluations (both initial and reevaluations) but not services In addition to the comprehensive compensatory plan, principals will no longer be able to pull special education teachers or teacher assistants to cover classes. A plan to increase the number of substitutes to high need schools is also in development.

Timeline: Immediately and ongoing

Progress Check: May 2023

		(300.320). The contracted individual provides direct service to approximately 36 students at the high school level.  A partial list of <b>Fogarty</b> students needing occupational therapy (OT) services per their IEPs were provided to administration.(300.320) There are more students who need OT services at Fogarty, but at the time of the interview the OT did not have the full list with her. <u>Documentation</u> : Data Analysis; Interviews; Observation	
Result/ Compliance	9	Program Continuum Middle Level  There are 5,163 students at the middle school level, and approximately 779 are students with IEPs. The special education least to most restrictive program continuum is as follows:  Inclusion: students are supported by a special educator in a push-in model in English and Math classes  Full Inclusion: students are supported by a special educator in a push-in model in English, Math, Science, and Social Studies.  Hybrid: students are supported by a special educator in a special education setting for 2 periods per day and supported by a special educator in a general education setting for 2-3 non elective periods based on the services outlined in each IEP. Hybrid classrooms are being phased out of the middle schools and students and teachers in the hybrid programs will transition to Self-Contained or Full Inclusion settings based on student needs and IEP team decisions. Self-Contained: students are supported by a special educator in a special education setting in English, math, science, and social studies. Bases on the services outlined in the IEP, students may remain in a special education setting for intervention or English Language Development class or are mainstreamed into a general education setting.  Behavior Intervention Program/Fragile Class: students are taught across all content areas in a special education setting in English, Math, Science, and Social Studies, using behavioral strategies and social/emotional supports with inclusion opportunities.	Special education administration has developed a comprehensive compensatory plan. They are now in the process of implementing it. There will be a special education manager dedicated to overseeing the compensatory plan.  Timeline: Immediately and ongoing  Progress Check: May 2023  FOLLOW-UP FINDINGS:

\*Exceptional Child Services (ECS): students are taught modified Common Core Standards (Essential Elements) in a multi-grade classroom by a special educator with inclusion opportunities. Students begin addressing transition goals at this level.

\*Autism: students are taught across all content areas in a special education multi-grade classroom with inclusion opportunities and a focus on supports for students with autism, such as Applied Behavior Analysis, discrete trial teaching, visual supports, Unique Learning and Activities of Daily Living skills (ADL). Students take the RICAS or the Alternate Assessment depending on their individual levels.

\*It is unclear why there is an ECS class title and then a separate Autism class title.

School	Program
Del Sesto	Inclusion (5)
	Full Inclusion (1)
	Hybrid (2)
	ECS (4)
	Autism (1)
Greene	Inclusion (4)
	Full Inclusion (1)
	Hybrid (2)
	Self-Contained (2)
	ECS (1)

At **DelSesto** the inclusion teachers and general education partners report using common planning time to plan units and lessons and adjust instruction to the needs of the special education students in the classes. The Exceptional Child Services classes are using the Unique curriculum. Also, at DelSesto the ESL teachers participate in some evaluation team meetings but do not typically participate in IEP meetings. IEP goals and ESL services are not aligned. Students receiving ESL services do not have access to academic intervention services. (300.320)

In addition to the comprehensive compensatory plan principals will no longer be able to pull teachers or teacher assistants to cover classes. A plan to increase the number of substitutes to high need schools is also in development.

Timeline: Immediately and ongoing

Progress Check: May 2023

At DelSesto Middle School staff shortages have resulted in special education teachers being pulled to cover uncovered classes. This appears to be a frequent practice for all teachers. In some classes observed, some special education students were not receiving specialized instruction as specified in their IEP due to the unavailability of special education teachers. (300.320) Students affected (EK6,EK7, EK8,EK9, and EK10 (mobility support affected when teacher and paraprofessional have been pulled).

Some of the Exceptional Child Services (ECS) classrooms at DelSesto lacked certified teachers due to staffing vacancies/shortages. (300.320) Three of the four classrooms lacked clear organization, schedules, or apparent routines. Many students were not engaged in learning and were unattended. There were frequent disruptions in the rooms with adults coming and going addressing students' personal needs. For several students there was no instructional engagement, no redirection and communication systems being utilized (List of students provide to administration. (300.320)

At the middle school level, both **Greene** and **DelSesto** schools have common planning time (CPT). Sometimes special educators participate in content department meetings because they are attached to a middle school content team, (example: math team). Other times, special educators participate in team meetings by team (grade or middle school team – example: brown team). Occasionally, the special educators meet as a department. Some teachers are able to use the CPT "department" time to work with co-teachers and plan instruction in advance to support students with IEPs. In some instances, the special educators will email or text a partner teacher to conduct common planning and in other instances there are not opportunities to plan in advance of the delivery of instruction.

At both DelSesto Middle School and Greene Middle School ESL teachers do not attend IEP meetings. There is no evidence of coordination between special education and ESL services in a student's IEPs. ESL teachers will however attend evaluation team meetings.

At Delsesto Middle School, some special education evaluations are affected by the limited availability of the Bilingual Evaluation team. Staff report that

Result/ Compliance	10	classroom coverage is beginning to affect meeting evaluation timelines. (300.301-300.303).  At Greene Middle School there is one Exceptional Child Services (ECS) classroom and two self-contained classrooms. The ECS class has students taking the Alternate Assessment and the self-contained classes have students taking the RICAS assessment. The two classroom teachers with students on the RICAS assessment will share students for different subject matter, but no students are currently participating in general education classes other than electives. All ECS and self-contained students attend an advisory period in the general education setting. In the self-contained classrooms at Greene Middle School students are from all grades, 6, 7 and 8. Teachers use the System 44 and Language! Programs and Trans Math as curriculum. Students in the self-contained classes attend general education electives.  **Documentation:** Data Analysis; Interviews; Observations**  Program Continuum High School Level There are 6,904 students at the high school level, and approximately 993 have IEPs. The special education least to most restrictive program continuum is as follows:  Resource: students are supported by a special educator in a special education setting for one class period.  Inclusion: students are supported by a special educator in a push-in model in English and Math classes.  Full Inclusion: students are supported by a special educator in a push-in model in English, Math, Science, and Social Studies.  Hybrid: students are supported by a special educator with an applicable	Special education administration has developed a comprehensive compensatory plan. They are now in the process of implementing it. There will be a special education manager dedicated to overseeing the compensatory plan.  Timeline: Immediately and ongoing  Progress Check: May 2023  FOLLOW-UP FINDINGS:
			FOLLOW-UP FINDINGS:
		<b>Hybrid:</b> students are supported by a special educator with an applicable content certification in a special education setting in English and Math; students are also serviced by a special educator in a push-in model in Science and Social Studies. The special education teacher is teacher of record for English and Math, the general education teacher is teacher of record for Science and Social Studies.	

**Self-Contained:** students are supported by a special educator with an applicable content certification in a special education setting in English, Math, Science, and Social Studies.

**Behavior Intervention Program/Fragile Class:** students are taught across all content areas in a special education setting by a special educator teaching collaboratively with a general educator in English, Math, Science, and Social Studies, using behavioral strategies and social/emotional supports. At the high school level, programming is provided at A-Venture with a focus on behavioral supports and restorative justice.

Also contains a Virtual Program: students are serviced by special educators in a virtual setting with the option to receive instruction and support in-person as needed.

\*Exceptional Child Services (ECS): Students are taught modified Common Core Standards (Essential Elements) in a multi-grade classroom by a special educator with inclusion opportunities. Students begin addressing transition goals at this level.

\*Autism: students are taught across all content areas in a special education multi-grade classroom with inclusion opportunities and a focus on supports for students with autism, such as Applied Behavior Analysis, discrete trial teaching, visual supports, Unique Learning and Activities of Daily Living skills (ADL). Students take the RICAS or the Alternate Assessment depending on their individual levels.

**Transition Programs:** students participate in transition programs following high school graduation and receive services from special educators and job coaching.

\*It is unclear why there is an ECS class title and then a separate Autism class title.

The current program breakdown is as follows for schools being visited

School	Program	
Mount Pleasant	ount Pleasant Inclusion	
	Full Inclusion	
	Exceptional Children Services	

	Autism			
Central	Inclusion			
	Self-Contained (departmentalized)			
PCTA	Inclusion			
	Hybrid (self-contained for ELA and math and all other subjects are in Inclusion)			

Providence Career and Technical Academy (PCTA). 1.) There is currently one social worker and a part-time school psychologist. Due to the vacancy of the part-time position, PPSD assigned two PPSD school psychologists in their unassigned periods to cover the school (3 hours per school psychology per week). One individual works on evaluations and the other individual sees three students for counseling per their IEPs. The social worker serves additional students in her unassigned time. It has been challenging to service the 27 students as outlined in their IEPs. She is providing less service than warranted due to the high caseload (300.320). A full-time school psychologist has been hired for the next school year and will start in September.

2.) This year during ACESS testing special education Inclusion teachers were pulled from their classes to facilitate the Access testing for that week. As they were not in their inclusion classes for that week, thus, no students received special education services/support that week. Compensatory services were provided.

A-Venture	Self-contained (departmentalized)		
	This is a separate program for		
	students with significant social		
	emotional challenges. It is located		
	on the ground level of Central		
	High School.		

The A-Venture Program serves about 70 students. Students go to their general education core content classes in the program and receive special education services in these general education classes. There is also a self-contained class for students who are emotionally fragile. An "over age under credited" program with two classes as well as a virtual leaning program. A recently

In addition to the comprehensive compensatory plan, principals will no longer be able to pull special education teachers or teacher assistants to cover classes. A plan to increase the number of substitutes to high need schools is also in development.

Timeline: Immediately and ongoing

Progress Check: May 2023

created program targets students who learn best in the afternoon (3:30-6:30). Twenty-five students attended. Dinner is served as part of the program.

They have a Director, Dean of students, full time social worker, behavioral specialists and six special educators. Four community transition assistant liaisons were requested through the CRP who will work with the youth getting them out into the community work programs and internships. Only 2 were approved by PSD fiscal for inclusion in the IDEA CRP. It is unclear why (see CRP finding, Section 2, item #5 for additional information).

At **Central High School** there are currently six vacancies out of 13 teachers. There are long term subs covering classes. It was observed that some of the subs merely sit in the class and do nothing. Students have experienced this "do nothing" substitute dynamic for almost the entire year in many cases. Central just received an occupational therapist but has been without one since February. No compensatory was provided nor was anyone covering the services. (300.320). The speech and language pathologist just went out on leave two weeks ago (she was also covering for the pre-K team) so now no one is providing those services at Central or the pre-K classes she was responsible for servicing. (300.320).

#### Elevator Issues

During the onsite review at Central High School a student (SW7) informed us that the elevator has not been working consistently and in fact, was not working on the day of the visit (5/18/22) so the student was unable to use it to attend classes which were all on other floors. The student's one-on-one teacher assistant was told to get the work and take the student to the "College Room" where the youth worked independently on class work. The student was clear that this is <u>not</u> the same as accessing your teachers and peers and has been an ongoing issue. The student also told us that the lift in front of the building only worked for about two weeks at the beginning of the year and has not worked since. The student goes to physical education at PCTA and must go in and out using the back of the building via a ramp. However, the sensor on the back door is not working so the youth and the one-on-one must always get to someone to let them into the building. This went on all winter. Note: The elevator was fixed the following day (5/19/22). The lift and sensor still needed to be addressed at the end of the visit.

There are two elevators at Mt Pleasant High School (MPHS). Staff report that one elevator works 'occasionally,' and one works 'most of the time.'

A formal elevator protocol will be put in place and all staff informed of the protocols.

Timeline: Immediately and ongoing

Progress Check: May 2023

At **Hope High School** there are also many special education staffing vacancies. There are approximately five special education vacancies and there has been no school psychologist all year (300.320). There is someone covering in their unassigned time, so the coverage is limited.

At **Mt. Pleasant High School** there are six special education vacancies (300.320). There are three ECS classrooms covered by long term teacher substitutes that are not special education certified. There is one long term substitute teacher who supports grade 9/10 Inclusion who is not special education certified. For grade 11 math there is not a certified special educator to support the general educator in co-taught classroom. It was observed that some of the substitutes merely sit in the class and "do nothing." Students have experienced this do nothing substitute dynamic for almost the entire year. The Autism classroom is staffed with one special educator, one teacher assistant and two enhanced staff. Currently, the classroom is not fully staffed (only one enhanced staff) creating a lack of support for students who are included in general education courses.

At the **high school level** there are special educators who also have a 'coverage caseload' in addition to their own caseload due to the lack of special educators. The "coverage caseload: average between 14-16 students each. Case managers are compensated for this coverage caseload. Reportedly, the special educator conducts and manages the paperwork but does not necessarily provide the service. The non-certified special educators (substitutes) often deliver the services.

At **Hope High School** there are also many special education vacancies. There are approximately five special education vacancies and there has been no permanent school psychologist all year. There is someone covering in their unassigned, so the coverage is limited (300.320).

Some of the recruitment challenges may stem from the belief that if certified special education teachers are the teacher of record for a core content subject (in a self-contained setting) they must also have the core content area of the subject they are teaching. That is not accurate although naturally, one encourages districts to make meaningful and data—based decisions on what secondary special educators may or may not be teaching.

<u>Documentation</u>: Data Analysis; Interviews; Observation

Special education administration has developed a comprehensive compensatory plan. They are now in the process of implementing it. There will be a special education manager dedicated to overseeing the compensatory plan.

Timeline: Immediately and ongoing

Progress Check: May 2023

Result/ Compliance	11	Adaptive Physical Education (APE)  At all schools, there is a certified APE teacher available to provide APE services as determined by assessment, student need and the IEP team. Services are provided in the least restrictive environment. At Central High School one students (SW7) did not receive APE during the 2020-2021 school year. This issue will be resolved/compensatory provided in the summer 2022. (300.320)  Three additional records were requested onsite from Mt Pleasant High School (JS6, JS7, JS8)  All three students have almost identical goals that consist of increasing the walking distance around the track with decreased verbal instruction. Student's (JS6) benchmarks are the same as the goal. It is unclear why these students are receiving APE.	Special education administration has developed a comprehensive compensatory plan. They are now in the process of implementing it. There will be a special education manager dedicated to overseeing the compensatory plan.  Timeline: Immediately and ongoing  Progress Check: May 2023  FOLLOW-UP FINDINGS:
		<u>Documentation</u> : Data Analysis; Interviews; Observation	
Result	12	Extended School Year (ESY)  Extended School Year is special education and related services provided beyond the regular 180-day school year. It is determined by the student's IEP Team whether special education and/or related service(s) are necessary beyond the regular school year for the child to receive a Free Appropriate Public Education (FAPE).  Providence Public Schools uses the IEP Team ESY Decision-Making and Documentation guide provided by RIDE at every student's annual IEP meeting to determine whether the student requires ESY. Typically, ESY is held for 4 weeks in July from 8:30-1:30 with approximately 200 students at the elementary level and 200 students at the middle and high school level. Guidance on ESY is provided in the Special Education Guidebook.  Documentation: Data Analysis; Interviews	

Result/ Compliance	13	Currently, there is not an existing Local Special Education Advisory Committee in the Providence Public Schools. District staff have participated in the LAC training provided by the Rhode Island Parent Information Network (RIPIN) this year and are in the process of forming a planning committee (including parents) to launch a LAC in the fall (300.900).  Documentation: Data Analysis; Interviews; Observation	PPSD will work with appropriate parent/family and community stakeholders to develop a local advisory committee per the RI regulatory requirements.  Timeline: Immediately and ongoing  Progress Check: May 2023  FOLLOW-UP FINDINGS:
Result	14	School Efforts to Partner with Parents (State Performance Plan Indicator #8)  The district's rate of parent participation in the annual Special Education Statewide Parent Survey (2019-2020) is 2,218 students, approximately 57% of parents whose children have IEPs.  Of parents with a child receiving special education services who participated in the last survey, the percent that reported that their school's efforts to involve parents as a means of improving services and results for children with disabilities is 22.5%, slightly below the state average of 25.3%.  Documentation: Data Analysis; State Performance Plan	PPSD will work with appropriate parent/family and community stakeholders to develop a local advisory committee per the RI regulatory requirements.  Timeline: Immediately and ongoing  Progress Check: May 2023  FOLLOW-UP FINDINGS:
Result	15	Drop Out / Graduation Rate (State Performance Plan Indicator #1 and #2)  Providence Public Schools graduation rate is 73.6% for all students and 60.8% for students with disabilities. These rates are below the state average rates of 83.9% for all students and 64.4% for students with disabilities.  Providence Public Schools dropout rate is 15.8% for all students and 13.5% for students with disabilities. These rates are above the state average rates of 8.3% for all students and 12.7% for students with disabilities.  Documentation: Data Analysis; State Performance Plan	

Result/ Compliance	16	Curriculum Challenges for Students with IEPs  Teachers reported that the secondary math program (Illustrated Mathematics) and ELA program (Study Sync) have electronic assessments. Teachers (special education and general education) at many schools reported that they do not feel that these online curriculum assessments address learning needs for students with IEPs. They also reported that, at the beginning of the year, schools were informed that they cannot make any accommodations to the online assessments as that may not provide a valid and reliable data pull. This created an issue where if students with IEPs have specific accommodations, per their IEP, these must be provided. Some schools reported that this perspective was then clarified so that they could provide specific accommodations. Other schools/teachers reported that they still are not allowed to provide accommodations per the IEP (300.320). This is a compliance issue. District-wide clarification is needed. It is unclear, however, how teachers are providing accommodations as the assessments are designed to be taken electronically where the scores are automatically loaded in after students finish. If that happens as the assessment intended, then student specific accommodation is, typically, not provided. Teachers also expressed great concern about the rapid pacing of the curriculum as not working for many students with intensive learning needs. Students in some classes reported that they have a difficult time comprehending and mastering the curriculum due to the intense pacing.  The elementary ELA program is America Reading Company (ARC: for reading) has Tool Kits which provide opportunities for reading supports. The math program is Engage New York: Eureka. Staff reported wanting more professional development on the math curriculum. The intention is to have a full-time literacy and a math coach at every elementary school to support	PPSD will provide district-wide clarification on providing accommodations for students per their IEPs on both formal and informal assessments and all related school work.  Timeline: Immediately and ongoing  Progress Check: May 2023  FOLLOW-UP FINDINGS:
Result	17	Childcare Workers (CCW)  In the Providence schools, the childcare workers (CCW) do student toileting, feeding and positioning as appropriate. They are not contracted to provide academic or behavioral support so if they are not toileting (changing diapers) feeding or positioning, they do not have to do anything unless by choice.	PPSD is encouraged to review, revise and refine ways in which students' functional IEP goals can be met with maximum independence.  Timeline: Immediately and ongoing

		Teacher assistants by contract are there to academically and/or behaviorally support students. Many staff reported that having the CCWs was not effective as their sole responsibility is to toilet.	Progress Check: May 2023
		<u>Documentation</u> : Data Analysis; Interviews; Observation	FOLLOW-UP FINDINGS:
Result/ Compliance	18	Interventional Specialist Challenges  Each school in Providence is assigned an Intervention Specialist. They serve as the Local Educational Agency (LEA) at IEP and evaluation team meetings and help process the paperwork for the IEP teams. Staffing/personnel issues and concerns lead to both compliance (300.320) and result challenges. These are outlined below.  At some schools (School #1) elementary special education teachers expressed frustration that the Intervention Specialist/LEA does not know the students and frequently suggests interventions that have already been attempted. The Intervention Specialist is viewed as a gate keeper to special education as the opinion of the LEA becomes the opinion.  At other schools (School #2) the Intervention Specialist was viewed as a support to the teachers. The teachers facilitated their IEP and reevaluation meetings, not the Intervention Specialist.  At School #3, the Intervention Specialist/LEA teachers reported that IEP goals were changed during the meeting without discussing it with the team. Incorrect information to the special education teachers (e.g., insisting the location be General Education. for a student being pulled into another setting, only state who is invited to the meeting, not who attended). It was also reported that benchmarks in the Unique curriculum should not be used for goals and objectives, but instead the ARC writing rubric be used although that program is not used. 300.320  Documentation: Data Analysis; Interviews; Observation	Professional development and continued supervisory support will be provided to ensure Intervention Specialists understand their roles and regulatory responsibilities.  Timeline: Immediately and ongoing  Progress Check: May 2023  FOLLOW-UP FINDINGS:

Result	19	PPSD Organizational Chart  Teachers (general and special educators) expressed frustration at the lack of a PPSD organization chart that details who is in what leadership position. They expressed confusion at who does what and who supervises whom.  Special Education teachers expressed the desire for more technical assistance and information on special education procedures and processes (e.g., when to complete prior written notice, how to navigate PowerSchool). It should be noted	PPSD is encouraged to share a current organizational chart with staff. This could then be updated as needed.  TimeLine: Ongoing  Progress Check: May 2023
		that the new special education administration team is in the process of developing an updated policy/procedures guidebook as well as technical assistance and professional development.  Documentation: Data Analysis; Interviews; Observation	FOLLOW-UP FINDINGS:

# 2. EVALUATION / INDIVIDUAL EDUCATION PROGRAM (IEP)

Indicator		Findings	Support Plan
Result/ Compliance	1	Records of approximately <b>33</b> students were reviewed prior to the on-site review by the RIDE, School Support System, Team Leaders. Students' records were very accessible. PPSD special education administration has received the comprehensive and detailed information list of all records reviewed. The overview of those findings is below. Twenty three ( <b>23</b> ) additional IEPs were reviewed during the course of the on-site review. Those records are cited throughout the body of this report.  RECORD FINDINGS OVERVIEW	Assurances will be provided to the Rhode Island Department of Education, Office of Student, Community and Academic Supports, that compliance issues are addressed and rectified. This Support Plan is applicable for all compliance findings in this section.  Timeline: Immediately and ongoing  Progress Check: May 2023
		Early Intervention Referral: 2 compliance findings, 0 result findings Initial Referral: 3 compliance findings, 0 result findings Evaluation/Reevaluation: 13 compliance findings, 6 result findings Procedural Safeguards and Parental Communication: 5 compliance findings, 2 result findings	FOLLOW-UP FINDINGS:

		IDEA transition: 7 compliance, 1 result findings	
		IEP General components: 65 compliance, 11 result findings	
		Other trends: 2 compliance, 1 result findings	
		Total: 92 compliance, 21 result findings	
		Note: Compliance findings are, naturally, entwined with results/outcome findings but are reflected as compliance because they also speak to specific regulatory requirements.	
		(RI Regulations Subpart D Evaluations, Eligibility Determinations, Individualized Education Programs and Educational Placements)	
		<u>Documentation</u> : Data Analysis; Interviews, Record reviews,	
Result/ Compliance	2	Child Outreach  Providence Public School's Child Outreach (CO) screenings are available in a range of community-based early childhood programs and by appointment from September through June. June, with some screening options available during the summer months. As reported through the ongoing work with the PPSD Executive Director of Early Childhood and Wellness and the Child Outreach Coordinator and considering the 7,600 3–5-year-old children requiring an annual Child Outreach screen, Providence's CO screening team is significantly understaffed.  The state target for screening is 80% of children ages 3, 4, and 5. Although the Child Outreach Coordinator works diligently to screen 3-, 4- and 5-year-old children, the district reported the following screening percentages for the 2019-2020 year:  - 3-year-olds: 4.2% - 4-year-olds: 26.1% - 5-year-olds: 34.9%	Human Resources in conjunction with special education administration has engaged in a recruiting blitz with incentives to fill critical need areas including special education and related services. The approximate number of special education vacancies (as of August 2023) is 24 as opposed to the 71 at the time of the review. PPSD will ensure that the appropriate number of early childhood special education teachers are hired.  Timeline: Immediately and ongoing  Progress Check: May 2023

The total number of students screened was 22.2%, under the state average of 28.1%.

As evident through ongoing work with the PPSD early childhood and special education leadership, in addition to vacancies in teaching and related services staff, there are unfilled evaluation team (ET) members including 1 psychologist and 1 social worker. In addition to filling the considerable number of vacancies, the preschool needs a sizable number of new FTEs to meet compliance with special education regulations, specific to new referrals. As of the end of May 2022, Providence had 67 children who were referred to special education through Child Outreach and who have not yet completed the eligibility/IEP process in accordance with regulatory timelines. RIDE does not have the available data to identify where an additional 125 referred to special education are in the referral process and if Providence held an evaluation team meeting to review the referral within the regulatory 10 school days. Providence has demonstrated difficulty meeting the timeline throughout the school year. As of the end of May 2022, PPSD has 118 students recorded in the Child Outreach database as eligible for special education services who were not noted in the special education census. Ongoing district registration concerns were noted, as were data entry issues, with a lack of personnel identified as the underlying concern.

Additionally, although not an issue specific to the special education program, at the end of May 2022, numerous children in the special education census were not identified by the district in the RIDE Enrollment system. This is problematic as it could adversely affect other areas such as the funding formula, attendance, performance data and disproportionality.

The Chief Student Support Service Officer, Executive Director of Specialized Instruction, Executive Director of Early Childhood and Wellness, Early Childhood Manager, and Child Outreach Coordinator have all worked extensively with the RIDE Early Childhood and Special Education team members to understand the data and to identify plans for improvement. They have made every effort to meet timelines but due to lack of personnel, were unable to do so in a timely fashion. Due to years of understaffing and to ensure that the necessary systems are put in place to achieve compliance, the district will need to invest in a substantial number of FTEs at the preschool level. A comprehensive staffing plan has been created by the PPSD team to add **63** new early childhood positions.

Special education administration has developed a comprehensive compensatory plan. They are now in the process of implementing it. There will be a special education manager dedicated to overseeing the compensatory plan.

Timeline: Immediately and ongoing

Progress Check: May 2023

#### **FOLLOW-UP FINDINGS**:

PPSD will hire the appropriate numbers of early childhood special education teachers.

Timeline: Immediately and ongoing

Progress Check: May 2023

#### **FOLLOW-UP FINDINGS:**

		<u>Documentation</u> : Document Review; Data Analysis, Interviews	
Result/ Compliance	3	Child Find (State Performance Plan Indicator #11) 300.301-300.303  Providence Public Schools for the 2020-2021 school year was at 85% compliance for meeting evaluation timelines for initial referrals. The federally mandated percentage is 100% (300.301-300.303). Policies, procedures and protocols for initial referrals, evaluations and eligibility meetings are being updated and shared with the district through the creation of the Special Education Guidebook.  This guidance includes information on: Special Education Referral Referral From Meeting Types and Guidelines (including ML students)	Human Resources in conjunction with special education administration has engaged in a recruiting blitz with incentives to fill critical need areas including special education and related services. The approximate number of special education vacancies (as of August 2022) is 24 as opposed to the 71 at the time of the review.  Timeline: Immediately and ongoing  Progress Check: May 2023
		Special Education Evaluations Special Education Eligibility Reevaluation and Exiting Students	Special education administration has developed a comprehensive compensatory plan. They are now in the process of implementing it. There will be a special education manager dedicated to overseeing the compensatory plan.  Timeline: Immediately and ongoing
		<u>Documentation</u> : State Performance Plan Data, Document review	Progress Check: May 2023  FOLLOW-UP FINDINGS:
Result	4	Student Accommodations and Modifications  Throughout the district special educators case managers meet with general education teachers to review accommodations and modifications and to answer any questions and address any concerns that the general education teacher may have. In addition, an "IEP At A Glance" is generated that provides essential student information for all school staff that may be supporting a student.	See Section 1, item #16 (Curriculum Challenges) for the support plan on compliance issues with accommodations.

		See also Section 1, item#16 (Curriculum Challenges) for the support plan on compliance issues with accommodations.	
		<u>Documentation</u> : Data Analysis; Interviews; Document Reviews	
Result/ Compliance	5	PPSD follows the Rhode Island Criteria and Guidance for the Identification for Specific Learning Disabilities. Existing guidance is being updated and reformatted in the Special Education Guidebook. Record reviews indicated that the SLD determination was inconsistently applied throughout the district. While there were pockets that adhered to the requirements there were also pockets that did not. At least one school had quality documentation of interventions and progress monitoring that could be replicated across the district. See record review findings for additional information (Section 2, Item #1). Additionally, many teachers reported that there is not a set of district-wide progress monitoring tools or district-wide formalized interventions (academic and social emotional) available nor were any, thus far, approved by PPSD fiscal in the CRP as part of a voluntary CEIS reserve. Despite the lack of a CEIS reserve, PPSD attempted to report students served by CEIS funds in the 2021-22 school year. (See also CRP finding, Section 2, item #7 for additional information).	PPSD will provide professional development in the area of SLD identification. See also Section 1, items #3 & #6 (MTSS) #16 Curriculum Challenges)  Timeline: Immediately and ongoing  Progress Check: May 2023  FOLLOW-UP FINDINGS:
Result/ Compliance	6	Due Process Information (State Performance Plan Indicators)	RIDE Dispute Resolution Personnel are responsible for due process follow-up and verification of due process information. This is
		<u>COMPLAINTS</u> FY 2019-2020	ongoing.
		# of Complaints: No complaints during this period	Timeline: Immediately and ongoing
		FY 2020-2021 # of Complaints: 2 complaints during this period	Progress Check: May 2023

	ISSUE(S)	RESULT
Complaint #1	Denied access to IEP Services/any Education since Sept. 2020	In-Compliance/Non-Compliance
Complaint #2	IEP Services/ Occupational Therapy	Non-Compliance

# **FOLLOW-UP FINDINGS**:

### FY 2021-2022

# of Complaints: 2 complaints during this period

	ISSUE(S)	RESULT
Complaint #1	IEP Services	Non-Compliance
Complaint #2	District not fulfilling IEP within reasonable timeframe/student being denied speech & language services (noted in IEP)	Did Not Accept/no signature on Complaint per Regulations and RI procedures - providing the opportunity for re-submission

## **MEDIATIONS**

FY 2019-2020 # of Mediations: 3 mediations during this period

	ISSUE(S)	RESULT
Mediation #1	Placement	Agreement

Mediation #2	IEP/Placement	Withdrawn
Mediation #3	Placement	Withdrawn

FY 2020-2021 # of Mediations: 6 mediations during this period

	ISSUE(S)	RESULT
Mediation #1	IEP Eval/Eligibility	Agreement
Mediation #2	Placement/Evaluation/ FAPE	Unresolved
Mediation #3	IDEA Services (home schooling)	Agreement
Mediation #4	District wants to withdraw IEP Services & give 504 Plan	Agreement
Mediation #5	Parents want to observe Physical Therapy, Occupational Therapy & Speech and Language sessions every six weeks for carry-over in the home	In Process
Mediation #6	Placement for 22-23' school year/School has not provided speech therapy services from Sept-Feb/1:1 per IEP has not been consistent all year	In Process

			Т
<b>HEARINGS</b>			
FY 2019-2020 # of Hearings:	2 hearings during this period	d	
,	ISSUE(S)	FINDING(S)	
Hearing #1	IEP Services/Placement	Withdrawn	
Hearing #2	IEP Stay Put (filed w/Legal)	Resolution Session Agreement	
FY 2020-2021 # of Hearings:	1 hearing during this period		
	ISSUE(S)	FINDING(S)	
Hearing #1	FAPE	Settlement Agreement	
FY 2021-2022 # of Hearings: Hearing #1	3 hearings during this period FAPE/comp services/atty fees	d Pending	
Hearing #2	Placement/Stay-Put	Withdrawn	

comply w/IEP, not receiving 1:1 services, comp services for speech & language.
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## **TIMES 2 - COMPLAINTS**

#### FY 2021-2022

# of Complaints: 3 complaints during this period

	ISSUE(S)	RESULT
Complaint #1	Parents want record cleaned / assign 1:1 to assist with class work	Not an alleged violation of IDEA, Not Accepted.
Compliant #2	IEP not being followed	Partial-Compliance: Non-Compliant/In-Compliance
Complaint #3	No Special Education and related services, 3-year reevaluations, annual reviews	Dismissed

## **TIMES 2 MEDIATIONS**

## FY 2020-2021

# of Mediations: 1 mediation during this period

	ISSUE(S)	RESULT
Mediation #1	Request for new special educator denied; conflict w/current special educator/IEP	Unresolved

<u>Documentation</u>: Data Analysis, RIDE, Due Process Data Base

Result/ Compliance	7	Consolidated Resource Plan (CRP)  A component of the School Support System (SSS) review is the IDEA, Consolidate Resource Plan (CRP) and American Rescue Plan (ARP) process (fiscal funding). The current PPSD process is as follows: Special education administration submits their proposed plans to the fiscal office for consideration via Word document or email. The fiscal CRP lead makes the determination on what (if any) of the proposed plans will be supported in the CRP or ARP. Rationale may or may not be provided to special education administration on why certain items were approved or not approved. This is, naturally, tied to the lack of an aligned and connected array of interventions, materials, supports and technical assistance which are necessary to ensure compliance with the IDEA requirements (300.320). Special education administration oversight of special education funds is critical for the ongoing clear and consistent budget planning and execution to improve and sustain best practice results for students with IEPs and ensure compliance with regulatory requirements. Thus, there is a critical priority need for the special education director to have administrative oversight and authority on how and when federal IDEA monies are spent in the district. It is very unclear why fiscal (and not special education administration) is allowed to have CRP control of IDEA program decisions.  **Documentation*: Interviews; Data Analysis and AcceleGrants**	To ensure compliance and remedy the myriad of current compliance items noted in this report PPSD special education administration needs to be in control of their federal monies (CRP, ARP etc.) and have the related autonomy.  Timeline: Ongoing  Progress Check: April 2023  FOLLOW-UP FINDINGS:
Result	8	Out of district student transfers into PSD and within district transfer request  At the secondary level, the Registration Office places students for inclusion and co taught but does not then notify or share the specific school placement information with the special education managers so the administrators must continuously check to see when/where the students are placed. This lack of communication and collaboration is challenging as there should be clear protocols and procedures for placements to streamline the process.  So, if a student comes into Providence and is viewed as a (departmentalized self-contained or hybrid), the respective special education manager must contact individual schools and inquire if there is any room for the student, thus, the process takes much longer than it should. There appears to be no central office/registration database for special education managers to review school program capacity/ openings.	PPSD will review and refine the out of district student transfers and within district transfers.  Timeline: Ongoing  Progress Check: May 2023  FOLLOW-UP FINDINGS:

		At the elementary level, the elementary manager places all students except resource students. Registration emails the manager the IEP and evaluations from the prior LEA. The manager is then able to review the information.  Documentation: Data Analysis, Interviews	
Result/ Compliance	8	Assistive Technology (AT)  At Vartan Gregorian, referrals for AT evaluations (to Tech Access) take extremely long to be completed. A 3-year re-evaluation meeting with recommendation for evaluations, including assistive technology, took place 11/15/21 (AW7). Evaluation took place in April 2022, with use of a 'loaner' device. Used successfully in May and will be taken away 5/27/22. Question as to when his AT device will be available to him for his use?  **Documentation: Interviews, Observation, Document Review**	Professional development will be provided to appropriate staff in the area of assistive technology. Compensatory services will be provided as appropriate.  Timeline: Immediately and ongoing  Progress Check: May 2023
		Documentation. Interviews, Observation, Document Review	FOLLOW-UP FINDINGS:

## 3. IDEA TRANSITION

Indicator		Findings	Support Plan
Compliance	1	Part C to Part B Transition (Indicator #12)  Indicator 12 is a compliance indicator requiring districts to have 100% of children referred from Part C Early Intervention and found eligible for special education to be in service by their 3 <sup>rd</sup> birthdays. A database of all referrals is maintained, and upcoming birthdates are monitored, with the goal of ensuring that meetings are scheduled in a timely manner. Providence, however, is out of compliance, with last year's consolidated resource plan (CRP) indicating that the district achieved 92% compliance. To improve this data, an Early Intervention Transition Improvement Plan was created, but unfortunately, the district was unable to meet the identified strategies, due to the significant ET staffing needs mentioned above.	Special education administration has developed a comprehensive compensatory plan. They are now in the process of implementing it. There will be a special education manager dedicated to overseeing the compensatory plan.  See also Section 3, item #7: Consolidated Resource Plan (CRP) and Section 1, item #7 Special Education Vacancies for their respective Support Plans.
		Community partners frequently sight challenges in communication and collaboration, as well as the opportunity for parent voice. Non-English-speaking	Timeline: Immediately and ongoing

		families have noted concerns regarding the time allotted at meetings, with not enough time given for interpretation. Again, this can be attributed to structural issues caused by insufficient staffing.  See also Section 1, item #7: Special Education Vacancies, Section 1, item #8: Preschool Continuum, Section 2, item #3: Child Find, Section 2, item #7: Consolidated Resource Plan.  Documentation: Data Analysis; Interviews; State Performance Plan; emails and phone calls, RG1 & 2 out of 5 records reviewed.	Progress Check: May 2023  FOLLOW-UP FINDINGS:
Result	2	IDEA Transition Planning at the Middle Level	
		Providence's Transition Advisory Committee (TAC) has developed middle school specific events to support middle school students in transition. The Providence TAC meets regularly, with membership including representation from all seven middle schools. At TAC meetings, several important topics to support middle school students are discussed, including training in transition assessments, writing exemplar transition IEPS, and the Consent Decree with its impact on middle school students, there are also guest speaker from RIPIN, Northern Collaborative, ORS and BHDDH.  The Providence TAC has a transition web site, found at: <a href="http://www.providenceschools.org/Page/595">http://www.providenceschools.org/Page/595</a> . There is a specific section for middle school teachers and parents that includes links to: <a href="http://www.providenceschools.org/Page/595">http://www.providenceschools.org/Page/595</a> . There is a specific to middle school students and approved by middle school TAC members. <a href="http://www.providenceschools.org/Page/595">http://www.providenceschools.org/Page/595</a> . There is a specific to middle school students and approved by middle school TAC members. <a href="http://www.providenceschools.org/Page/595">http://www.providenceschools.org/Page/595</a> . There is a specific to middle school students and approved by middle school TAC members. <a href="https://www.providenceschools.org/page/595">https://www.providenceschools.org/page/595</a> . There is a specific to middle school, college, and career: Holland Code is another interest inventory administered to students. <a href="https://www.providenceschools.org/page/595">https://www.providenceschools.org/page/595</a> . This inventory helps with planning for high school, college, and career: Holland Code is another interest inventory administered to students. <a href="https://www.providenceschools.org/page/595">https://www.providenceschools.org/page/595</a> . Avviance is used by all middle school students. This program is accessed online and alll	

- Career and Technical opportunities at high schools, as presented by PCTA seniors:
- Transition assessments, specifically, having students log onto "Drive of your life" and setting up an account;
- Explaining the school choice process in Providence;
- How students can obtain their working papers, as explained by a representative from the Department of Labor;
- How to use RIPTA, which many students would utilize for the first time in high school. The TAC was able to secure an actual RIPTA bus for the event to walk students through the process;
- Money Management, as presented by a representative from the Pawtucket Credit Union.
- First Aid and CPR training program are also offered.

Additionally, Providence had middle school representation at the two -day Rhode Island Transition Institute at Rhode Island College. Additionally, there are 2 Middle School collaborative coaches that participate in the Middle School Cohort facilitated by the Director of Regional Transition Services and Transition Coordinators from the East Bay Region.

Transition activities begin for a student turning 14 during the timeframe of their IEP and for students in separate classes with research on career cluster and middle school interview. The Exceptional Children class uses MAPs as part of the Career Development Plan, as well as the transition activities in the UNIQUE Curriculum.

For the past 2 years, students in the self-contained classroom at Greene have participated in growing an organic garden in collaboration with Steve Lee's Organics and Sodexho. The students learned how to prepare the soil, plants seeds, place them under the lamps, water and harvest their vegetables. The 2 teachers incorporated this experience into transition lessons addressing Education and Training and Independent Living Skills. The 2 teachers plan to expand transition lessons for the upcoming school year. Students at Greene attend the high school assemblies that are held throughout the school year.

Delsesto Middle School has two elective courses to address transition. Career Exploration is an elective for students and the Transition class is a yearlong course for grade 8 students in inclusion with IEPs. Teachers of students in the Exceptional Children classroom address transition through Career Development Plans and have started to use the MAP process.

Administrators will provide professional development in the use of the guidance sheet

	At <b>DelSesto Middle School</b> and <b>Greene Middle School</b> , a number of IEPs needed to be rewritten at the beginning of the school year because the programs described in the elementary IEP did not match the programming at the middle school and/or the state assessment accommodations were not provided to students routinely in daily instruction. At <b>Greene Middle School</b> , teachers use the Career Finder in the Naviance platform and the O-net for completing transition goals in student's IEP. At Greene and DelSesto Middle Schools, Inclusion Teachers support students in English Language Development classes.  **Documentation:** Data Analysis; Interviews; Record Reviews**	to facilitate an IEP reflective of middle school programming.  Timeline: Ongoing  Progress Check: May 2023  FOLLOW-UP FINDINGS:
Result 3	Providence's Transition Advisory Committee (TAC) has developed high-school specific events and supports for high school students. The Providence TAC meets regularly, with membership including representation from nine high schools and 3 Transition Programs, RIPIN, Northern Collaborative, CCRI ORS, and BHDDH. At TAC meetings, several important topics to support high school students were discussed, including training of transition assessments, writing exemplar transition IEPs, and the Consent Decree with its impact on high school students.      On June 12 <sup>th</sup> , we will have a guest speaker at our TAC meeting from CCRI's Disability Office.  The Providence TAC continued to develop the transition web site, found at: <a href="http://www.providenceschools.org/Page/595">http://www.providenceschools.org/Page/595</a> There is a specific section for high school teachers which includes grade-specific and age-appropriate transition assessments, with sections specific for 9th, 10th, 11th and 12th graders and parents that includes links to:  High school Student/Teacher Interview: This interview is specific to high school students and approved by high school TAC members;  Naviance – This site assists with planning for high school, college, and career;  Envision Your Career: This is a language -free interest inventory to support non-English speakers and non-readers explore career interests.  Transition Planning Inventory (TPI) information;	

A Google website is also available for all teachers: <a href="https://sites.google.com/providenceschools.org/transition/home">https://sites.google.com/providenceschools.org/transition/home</a>

The site also includes links to important resources for transition support, such as links to ORS, BHDDH, benefits planning flyer, and helpful links to supporting students transitioning and understanding how delivery of supports changes once a student exits high school.

Additionally, Providence had high school representation at the Virtual Transition Institute at Rhode Island College.

The Providence TAC also participates and organizes students to participate in transition events. The school had 47 students from 3 schools (Mount Pleasant, Alvarez, and 360) and 3 Transition Programs (Project Search, Providence Transition Academy, and Providence School to Tomorrow Academy) participate in the "Footsteps to my Future "Virtual Transition Fair. The school also had students from the Providence Transition Academy present on the employment panel at this event. Special education administration has shared information with all schools to participate in Dare to Dream. It will be held on May 26, 2022.

Due to Covid, PPSD held off on the annual Transition Night, but are looking forward to holding it once again for the 22-23 school year. During this night we provided information for students with disabilities ages 14-21. This transition event offered resources and open opportunities for families to hear from several agencies and organizations that support students through high school and beyond.

To offer additional support for families, PPSD is piloting a program called "Charla" with an agency called Lazo, a cultural brokerage. The Charla Pilot Project offers small group and 1:1 sessions that are individualized and personalized to meet the needs of students to improve transition outcomes. Resources and timelines, including applications to adult services and all supporting documentation is provided in English and Spanish at the appropriate intervals to maximize the level of comfort and understanding of each phase of transition.

Providence has restructured staffing and supplied specific vocational -support training to comply with the Interim Settlement Agreement and the Consent Decree in supporting students with intellectual disabilities in trial work

experiences. Providence has continued with the staffing of Community Transition Assistant Liaisons. (CTALs) CTALs provide support to the instructional program with specific responsibilities for supporting vocational, social, leisure, and ADL experience opportunities for individuals with disabilities by assisting students with pre -employment and employment skills and providing information and/or direction to students. CTALs have received training at their schools, as well as through the Sherlock Center, NCISI/FEDCAP, and/or West Bay Collaborative to support students in community and vocational experiences. Providence has also hired and trained Job Developers and a Community Partner Liaison to further support students with intellectual disabilities. It is unclear if any of the ECS teachers from MPHS attend the Teacher's of Life Skills Network (TLS) where communications, trainings, etc. occur related to the Consent Decree.

A Transition Advisory Council checklist has been developed and is available on the Providence transition website outlining grade -by -grade expectations and activities to support students with intellectual disabilities. Providence also has three transition programs: Project SEARCH, Providence Transition Academy, and Providence Autism School to Tomorrow Academy. Project SEARCH: A unique, business -led, one -year, school -to -work program that takes place entirely at The Miriam Hospital. Total workplace immersion facilitates a seamless combination of classroom instruction, career exploration, and relevant job -skills training through strategically designed internships. Providence Transition Academy: In partnership the Office of Rehabilitation Services, the Providence Transition Academy is a unique program that provides students with disabilities, who have met all their academics credits, an opportunity to meet their high school transition requirements, learn specific employment skills and become more informed about personal options available at an exceptional location. Students will continue to learn in a traditional building setting, in the community and most often independently in a business/work situation. Referred students benefit from a curriculum based vocational and career exploration program that extends time to complete their transition goals. Providence Autism School to Tomorrow Academy: Designed for students 18 -22 years of age who have been identified as having a disability and have met all academic requirements for graduation but still require intensive instruction on transition services and supports. Students are instructed on required daily living skills, community participation and integration, and vocational skills both in a classroom setting and at community work sites with varying levels of job coaching supports.

Mount Pleasant High School staff discussed opportunities for students and 57 families to access information about transition academies, Project Search, PASTTA (i.e., 18-22 year old programs). At both the middle and high school levels staff spoke to the need for a continued array of supplemental reading materials and related professional development/ technical assistance to provide students with IEPs the best possible access to community-based reading skills Mount Pleasant High School, JSEC, 360 High School, Hope High School, and Alvarez High School all have a transition-band classroom for students who are 18-22 years old with severe to profound disability. The school-based programs are focused on life skills to transition from school to adulthood. Students within the program complete two 60-day trial work experiences as well as other important real-life experiences.

Transition Elective: PCTA, Alvarez, and Mount Pleasant all participate in a Transition elective focused on vocational skills, college-readiness, employment training/exploration and life skill development. The students in this program are in the mild/moderate classes.

#### Compliance

There is not a Transition Elective offered at **Mt. Pleasant High School** (MPHS). MPHS also does not use Virtual Job Shadow. Due to the staffing vacancies little to no evidence of career exploration, work-based learning and life skills and self-advocacy development was seen for students in the mild/moderate classes. Three of the five ECS classrooms lack certified special educators (300.320). Classroom observations raised concerns about age-appropriate activities and classroom instruction related to pre-employment skill development. The public facing PPSD transition information on the website as well as the Transition scope and sequence has not been updated. There is an internal transition website that is updated. PPSD is encouraged to merge these two websites.

At MPSH an IEP (JS5) had four tasks listed on the transition page of the students IEP. The special educator said informal checks were facilitated with the student but there was no evidence of any of the four transition tasks being completed for this graduating senior. (300.320)

**Providence Career and Technical Academy** (PCTA) has two transition classes for 9<sup>th</sup> grade students, however, there is no formal curriculum. Teachers either rely on various transition related platforms (Virtual Job Shadow) and create their own materials.

Special education administration has developed a comprehensive compensatory plan. They are now in the process of implementing it. There will be a special education manager dedicated to overseeing the compensatory plan.

Timeline: Immediately and ongoing

Progress Check: May 2023

## **FOLLOW-UP FINDINGS**:

Transition scope and sequence and overall curriculum will be reviewed, refined and

Result

		At <b>Central High School</b> there are two transition classes (Transition 1: Interview skills, resumes, etc. and Transition 2: Fiscal literacy). However, there is no formal curriculum. Teachers either rely on various transition related platforms or create their own materials.  There are no district-wide formal transition curriculum programs various electronic platforms like Virtual Job shadow and elements in Naviance. Additionally, the district's transition scope and sequence are outdated and need revision. <u>Documentation</u> : Interviews, Data analysis, Document review	revised as appropriate. This updated information will be shared with staff.  Timeline: Immediately and ongoing  Progress Check: May 2023  FOLLOW-UP FINDINGS:
Result	4	The Office of Rehabilitative Services (ORS) and to the Department of Behavioral Healthcare, Developmental Disabilities & Hospitals (BHDDH).  For ORS referrals, Providence has developed a grade-by-grade process that specifies roles and responsibilities for students who will likely be referred to ORS. This process has been sent by memo to all secondary schools and reviewed with intervention specialists, teacher leaders and TAC members. In 8th grade, ORS information is shared with teachers. For students likely to apply to ORS, case managers document this information in the Transition Services section of the student's IEP. In 9th grade, teams determine when evaluation information needs to be completed and obtain permission for testing from parents. In 10th grade, case managers send ORS the parent release, IEP, and appropriate evaluations. Additionally, representatives from ORS are assigned to specific high schools to help support teams. Early in the school year, ORS representatives speak with teachers at their schools to explain services and the referral process. Links to ORS can also be found on transition web sites, as well as supporting materials. On the Providence transition site, there is a link to BHDDH and the BHDDH meeting invite letter. Representatives from both ORS and BHDDH annually speak at the TAC meetings. ORS are regular participants at TAC meetings. Beginning when the student is turning 14, ORS and BHDDH are active in the Community Development Plan (CDP) process for students with intellectual disabilities. Both ORS and BHDDH are invited to CDP meetings and participation in meetings is documented in the CDP. Providence also works collaboratively with ORS on both ProjectSEARCH and Summer Work Experience program. BHDDH participates with the families of ProjectSEARCH,	

Result	5	including the interview process to explain their services. ORS is also a partner with the Providence Transition Academy.  **Documentation:** Interviews; Data Analysis, Document Review**  The case managers facilitate Summary of Performance (SOP) as appropriate.  Providence Schools utilize PowerSchool to develop student's Summary of Performance. Meetings are held near the time of student's exit from high school. The summary of performance is developed by the IEP team and includes accommodations that were effective in high school, areas of the student's disability that may impact their post -secondary goals, and present level and recommended accommodations in the areas of education & training, employment, and independent living, along with possible agencies to assist.  **Documentation:** Interviews; Data Analysis, Document Review**	
Compliance	6	Youth with IEPs aged 16 and above with an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon an age-appropriate transition assessment, and transition services. In the last reporting period, Providence Public Schools is 100% compliant with the requirements. (State Performance Plan Indicator #13)  Students beginning at the age of 14 are eligible for PreEmployment Transition Services (PreEts) prior to eligibility determination for ORS. Students only need to be on an IEP to receive services. It is unclear whether PreEts services are being introduced or provided to students at MPHS (300.320). See also record review findings in Section 2, item #1.  Documentation: Interviews; Document Review, Record Reviews	PPSD will provide professional development in the area of Pre-ETS to all appropriate staff.  Timeline: Immediately and ongoing  Progress Check: May 2023  FOLLOW-UP FINDINGS:
Result	7	74.4% of PPSD youth who are no longer in secondary school, had IEPs in effect at the time they left school, and who have been employed, enrolled in postsecondary school, or both within 1 year of leaving high school. The state target is 88%. (State Performance Plan Indicator #14)  In the most recent data (2020-2021 exiters) for Indicator 14, PPSD's Response Rate is higher than the state average as it was in the previous year's data which indicates that PPSD is working hard to outreach and successfully contacts	

recent exiters. PPSD is commended on this continued improvement to increase the strategies to improve student engagement and outcomes. It will be important that PPSD students are referred to appropriate state agencies, especially the Office of Vocational Rehabilitation (ORS) and able to participate in Pre-Employment Transition Services (PreEts) as well as other services that this agency can provide while students are in middle and high school. School personnel should reach out directly to the ORS counselor assigned to PPSD to coordinate needed and varied services/programming for the 2022-23 school year. The Southern RI Regional Coordinator could also support the LEA in initiating these services if needed.

<u>Documentation</u>: Interviews; Document Review, Data Analysis, State Performance Plan data