

GRAND RAPIDS PUBLIC SCHOOLS
SPECIAL EDUCATION
PROGRAM REVIEW REPORT

March 13, 2017

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GRAND RAPIDS PUBLIC SCHOOLS
SPECIAL EDUCATION PROGRAM REVIEW REPORT

PART ONE

INTRODUCTION TO THE REPORT AND THE SPECIAL
EDUCATION PROGRAM REVIEW PROCESS

This Report is the result of a comprehensive Program Review of the Grand Rapids Public Schools (GRPS) Special Education system. The Program Review was initiated at the request of GRPS in response to issues and concerns that had been raised by Parents, School Staff and members of the Grand Rapids Public Schools community to the Superintendent and/or the Board. The GRPS also concluded a Program Review was timely, because the last Program Evaluation was done in 2010 by Future’s Education Inc., rather than GRPS. The Future’s Education Inc. findings for Center and Non-Center Programs were reportedly not directly communicated to the staff and the recommendations were not fully implemented by GRPS.

The goal of the Special Education Program Review was to generate findings and recommendations by identifying areas of strength and areas of growth or improvement in critical areas of the GRPS special education system. In addition to direct input from the GRPS Superintendent and the GRPS Board of Education, a Special Education Program Review Team was developed as a “steering committee” to provide focus areas. This team offered candid and direct input regarding experiences within the GRPS special education system and, based upon that input, was asked to assist in making recommendations of what to look for and where to look for it. The process was designed in a manner that would ensure that the findings and recommendations were data-based and properly reflected broad and genuine stakeholder input and collaboration through a variety of input methods.

The Program Review Report is offered and the recommendations at the conclusion of the Report are made with the knowledge and understanding that GRPS is in the midst of implementing several multi-year district-wide initiatives, plans and reforms. Copies of these reports and recommendations, including the Cambridge Education Quality Review Report (April 2012) and the GRPS Transformation Plan (3.0) Final Recommendations (December 2012) were made available to and reviewed by the Program Review Consultant. The Program Review Consultant made every effort to ensure that the recommendations in this Report are consistent with and do not conflict with, undermine or confound the recommendations in those other reports, plans and initiatives.

Special Education Program Review Facilitators and Program Review Consultant

The Special Education Program Review was conducted with facilitation provided by the Executive Director of Special Education, the Special Education Director of Accountability (“Program Review Facilitators” or “Facilitators”) and through Consultation with the Special Education Program Review Consultant (“Program Review Consultant”).¹ The Facilitators provided support to the Special Education Program Review Team (“Program Review Team”), which was made up of a group of stakeholders more specifically identified through a process described in the next section of this report. The Facilitators assisted in scheduling and coordinating the Program Review Team Meetings and Program Review Consultant site visits. The Facilitators also assisted the Program Review Consultant by providing access to records, data or information that was requested by the Program Review Team or the Program Review Consultant.

Special Education Program Review Team

As part of the Special Education Program Review, the District organized a group for the purpose of providing opportunities for input and feedback from stakeholders. The Special Education Program Review Team was made up of the following 28 Members:

- 1 Special Education Supervisor from GRPS
- 1 Principal from a General Education Building in GRPS
- 1 Principal from a Special Education Building in GRPS
- 3 Teacher Consultants from GRPS
- 3 Special Education Related Service Providers from GRPS
- 5 Special Education Teachers from GRPS
- 3 General Education Teachers from GRPS
- 1 Executive Director for Special Education (Facilitator Role)
- 1 Executive Director for General Education (a second Executive Director for General Education participated as an alternate).
- 1 Director in the Office of Special Education (Facilitator Role)
- 4 parents of students with disabilities in the GRPS
- 3 Students (1 Middle School; 1 High School and 1 from Transition Programming)
- 1 GRPS Bargaining Unit Representative

Membership on the Program Review Team was on a volunteer basis through an open invitation for participation distributed to the buildings through the Special Education Administrators, Building Principals and Executive Directors for the District. The Program Review Consultant attended all Special Education Program Review Team Meetings to permit a first-hand observation of the Program Review Team activities. While not all members of the Program

¹ The credentials of the Program Review Consultant are attached in the Report Appendix at Tab 1.

Review Team attended all of the meetings, the Program Review Team was relatively stable and Members should be commended for lending their time, effort and expertise on a volunteer basis for the good of the GRPS Special Education Program. Many of the Program Review Team Meetings went over the allotted time due to engaged conversations and feedback.

PART TWO

METHODOLOGY BEHIND THE REPORT, THE FINDINGS AND THE RECOMMENDATIONS

The Special Education Program Review process was defined through a collaborative and flexible discussion of the stakeholders, with input provided by the GRPS Administration (including the Superintendent, the GRPS Executive Directors and Special Education Administrators), the Program Review Team, and the Program Review Consultant. Input was provided by the Grand Rapids Public Schools Board of Education during a meeting with the Board on April 18, 2016. The Special Education Program Review Consultant participated in all Special Education Program Review Activities and authored this Report.

Program Review Consultant Record and Data Reviews

As part of the Special Education Program Review, various records and District data portraits were provided by the District at the request of the Program Review Consultant or Members of the Program Review Team. Some of the materials reviewed are as follows:

- * GRPS 2013-14 MI School Data Portraits;
- * GRPS 2014-15 MI School Data Portraits;
- * Cooperative Agreement with Kent ISD for Center Programs (2015-16);
- * Kent ISD Plan (8/2011);
- * Kent ISD Caseload Limits;
- * GRPS Special Education Classroom Location / Numbers Fall 2015;
- * GRPS Proposal for Phase II Transformation for Pre-Kindergarten Expanding Opportunities for Services with Peers;
- * Clinical and Educational Services Analysis for GRPS Futures Education Report and Analysis for Center and Non-Center Based Programs (2010);
- * Tuition Memoranda regarding Center Based Program Costs and Analysis (2012-13; 2013-14; 2014-15);
- * GRPS Graduation Requirements (Board Policy – Series 7600R);
- * GRPS High School Curriculum Guide (2014-15);
- * GRPS Graduation Rates for Students with Disabilities (2010-2011 through 2014-2015);
- * GRPS Dropout Rates for Student with Disabilities (2010-2011 through 2014-2015);
- * GRPS Suspension / Expulsion Rates for Students with Disabilities (2014-2015; 2015-2016).

- * Quality Review Report, Cambridge Education LLC (April 2012)
- * GRPS Transformation Plan 3.0 Final Recommendations (December 2012)

The Program Review Consultant conducted on-site record and data review meetings on several dates prior to the first Program Review Team meeting. Additional on-site and off-site record and data reviews were conducted by the Program Review Consultant throughout the course of the Special Education Program Review and through the date this Report was finalized.

Program Review Team Meetings

The Special Education Program Review Team met on the following dates:

February 11, 2016
March 10, 2016
April 21, 2016
May 12, 2016
May 26, 2016

During scheduled meetings the Special Education Program Review Team participated in group discussions in response to prompts and other collaboration techniques, with the goal being to ask the Special Education Program Review Team to identify concerns, areas of strength and areas in need of improvement or growth opportunities in the GRPS special education system.² The Special Education Program Review Team also participated in development of two surveys that were ultimately distributed to the GRPS staff and parents. The Special Education Program Review Team also gave direction to the Special Education Program Review Consultant with regard to site visits. The Program Review Meetings, Surveys and the Program Consultant Site Visits are further discussed as appropriate in the sections below.

Program Review Consultant Site Visits

The Program Review Consultant conducted several site visits in the Grand Rapids Public Schools. Throughout the site visits, the Program Review Consultant visited Early Childhood Special Education Programs; Center Based Programs at Lincoln Schools Campus; Elementary Categorical Classroom Programs; Middle School Categorical Classroom Programs and High School Categorical Classroom Programs. By design, the site visits were relatively random and announced close in proximity to the day of the visits to enhance the Program Review Consultant's ability to visit the program in its typical state of operation.

During the site visits, the Program Review Consultant spoke with building administration where they were available, spoke with special education teaching staff and other special education personnel and observed classroom instruction and other educational and non-curricular

² In this respect, the process embraced the "replicate what is working and stop what is not working" value that helped shape the GRPS Transformation Plan.

activities. During each of the site visits, the Program Review Consultant informed building administration and staff that their comments would not be individually identified to any person or program, but their input would be considered in making recommendations where appropriate to the purpose and overall goals of the Special Education Program Review.

On the whole, the on-site visits revealed a skilled and supported staff. The classroom and building facilities were well kept and more than appropriate to the use. On the whole, the classrooms were well-equipped, properly furnished and appropriate to the learning environment, with modifications to environments evident to address the unique learning needs of the students in the environment. Classroom technology was largely in place at all of the facilities and programs, but is in need of updating to support the learning styles, teaching and data collection needs of the students and staff.

At the time of the visits, each classroom appeared to have appropriate curriculum materials in place, which were used effectively with the students. In several of the classrooms, group learning activities were observed with students engaged, mostly on task and interacting with the staff. Students were also observed to be engaging independently and with each other in groups. In those few cases where there were off task or other student behaviors observed during the visits, staff were able to intervene appropriately and to redirect the students to the learning environment appropriately. Where necessary by rule or by virtue of the Kent ISD Plan, the classroom staff was adequately supported by additional instructional aides, other paraprofessionals/child care worker personnel and related service providers. In all cases during the on-site visits, the professional staff was well-equipped and clearly knowledgeable and able to provide and differentiate their instruction and to move throughout the classroom to support students who needed more direct intervention from the teaching staff. All of the special education classroom programs that the Program Review Consultant observed were within the caseload limits, with several below limits.

Additional comments regarding the site visits will be incorporated into the Findings and Recommendations Part of this Report where appropriate. [See Parts Three and Four, pp 8-30].

Parent and Staff Surveys

As part of the Special Education Program Review, the Program Review Team assisted with the design of surveys to ensure that there was an opportunity for input from the GRPS Staff and the GRPS Special Education Parents regarding the GRPS Special Education Program. The Special Education Program Review Team created initial questions, which were then reviewed by the Program Review Consultant. The Program Review Consultant also conducted research related to the use of surveys as part of Special Education Program Reviews conducted throughout the Country and ultimately shared drafts of the questionnaires with the GRPS Administration. Other than minor technical edits, substantive changes were not made to the content by the GRPS Administration within the questions in the surveys.

As a current adjunct faculty member of Grand Valley State University, the Program Review Consultant approached Grand Valley State University’s Statistical Counseling Consulting Center (GVSU SCC) to request that it collaborate with GRPS on the implementation of the surveys. GVSU SCC agreed to assist the GRPS by creating the online surveys, by assisting in the launch of the surveys and by assisting in the collection and cross-tabulation of data sets within the surveys. The Program Review Consultant expressed to GVSU SCC the importance of having the survey results submitted by the recipients in an anonymous manner and that neither the Consultant nor GRPS would be interested in individually identifying any respondent’s results or in attempting to correlate those results to a specific Staff Member or Parent. The Program Review Consultant also emphasized the importance of not identifying the Parents or the staff identities to ensure privacy protection and confidentiality of the respondents’ answers to the survey. [A copy of the Surveys and the Aggregate Responses can be found in the Appendix under Tab 2].

The GVSU SCC reviewed the draft questions and made some recommendations regarding minor revisions to questions to ensure that the survey was accessible and launched in a manner that allows for maximum integrity of the results. The GVSU SCC also assisted in the survey design to ensure that the surveys were easily completed. Finally, GVSU SCC assisted in the collection and reporting of the survey results once the survey windows were closed.

Staff Survey – Demographics and Response Rate

The Surveys were made available to all GRPS staff for input, including all Executive Staff, Administrative Staff, general education and special education staff and other full-time staff. The Staff surveys were finalized by GVSU SCC on September 12, 2016. GRPS launched the Staff Survey on September 19, 2016. GRPS sent 2 emails to staff announcing the survey (original deployment, and a reminder September 28, 2016). Additionally, a robo-call was deployed to staff following the original email. The GVSU SCC received a total of 558 Responses from the staff to the survey. The Staff Survey windows were closed and final survey results were compiled by GVSU SCC on November 11, 2016. Additional data sets were also requested by the Program Review Consultant from GVSU SCC prior to the completion of the Report. [The data sets can be found in the Report Appendix at Tab 2].

The response rates among the staff respondents were as follows:

Administrative Staff	06.49%
Certified Occupational Therapist^	03.24%
Child Care Worker	06.49%
General Education Teacher	20.00%
Nurse (RN / LPN)	03.60%
Paraprofessional	03.96%
Physical Therapists	01.80%

School Psychologist	01.98%
School Social Worker	03.96%
Special Education Teacher	27.93%
Speech and Language Pathologist	09.19%
Teacher Consultant	02.16%
Other*	06.41%

^ The number of respondents includes respondents who identified themselves as either an occupational therapist or a certified occupational therapist.

*5.59% of Staff Respondents identified themselves as “other”. Any respondent group that numbered below 10 respondents was aggregated to the “other group” to prevent the potential for personal identification of a staff member. Those group #s are also redacted in the Survey Response summaries to prevent the personal identification of a staff member respondent. [See Report Appendix, Tab 2].

The Staff Respondents represented themselves based upon the age and grade level of the students they work with as well, with the following results:

Home Community (Birth to 3 years old)	04.19%
Early Childhood Special Education	08.19%
Great Start Readiness	01.71%
Elementary (K-5 th grade)	43.05%
Middle School (6 th – 8 th grade)	15.81%
High School (9 th – 12 th grade)	17.14%
Post-Secondary Transition (18-26 years old)	09.90%

The Staff Respondents’ answers to the questions and the implications are further addressed in Parts Three and Four of the Report, below.

Parent Survey – Demographics and Response Rate

The Parent Survey was developed using a similar process to the Staff survey and finalized on September 12, 2016. GRPS launched the Parent Survey on September 27, 2016. The Parent Survey was made available to all Parents of students with IEPs in the District through direct email when available and consented, through email to formal and informal parent groups established across the district (Parent Chats, Special Needs Advocacy Alliance of Kent County (SNAAKC), Parent Advisory for Special Education (PASE), Newsletters, Fliers on office counters, We Are GR Communication blast, robo-calls and at Conferences. A total of 2 emails were sent to the Parents. In addition, the link was published in building based newsletters, provided via flier at central office locations, provided to the GRPS PASE representatives, and to the Special Needs Advocacy Alliance of Kent County. The survey window on the Parent Survey

was closed on November 11, 2016. Additional data sets were also requested by the Program Review Consultant prior to the completion of the Report. [See Report Appendix, Tab 2].

A total of 170 Parents of students with IEPs submitted responses to the Parent Survey, with many of the respondents completing only a portion of the survey. The responses were disaggregated by grade level of the student on whose behalf the Parent response was submitted. The results by grade level of students were as follows:

Preschool	16.08%
Elementary	33.57%
Middle School	7.69%
High School	19.58%
Post-Secondary Transition	23.08%

The response rates were also disaggregated by primary disability in all 13 recognized eligibility areas for Michigan Special Education. The response rates varied widely from 0.00% for two categories (Deaf/Blind and Traumatic Brain Injury) to a high of 23.61% (Autism Spectrum Disorder). Parents of students who are severely multiply impaired (18.75%), speech and language impaired (18.06%) and cognitively impaired (17.36%) were the next most-frequent responders among Parents.

Since the total GRPS special education head count for 2015-2016 was just under 4,000 students (3,875 per 2015-2016 MI School Data), the total response rate of 170 Parents represents just under 4.5% of the student population, assuming only one Parent response per student.³ The overall low Parent response rate should be taken into account when analyzing the data and making extrapolations to the broader Parent / Special Education Student community. The Parent Respondents' answers to the questions and the implications are further addressed in Parts Three and Four of the Report, below. [See pp 8-30].

PART THREE

ANALYSIS AND BASIS FOR FINDINGS AND RECOMMENDATIONS

SECTION I. SPECIAL EDUCATION DEPARTMENT COMMUNICATION WITH STUDENTS, PARENTS, STAFF AND PARTNERS

The Executive Director for Special Education is the primary facilitator for communication regarding Grand Rapids Public Schools between the Administration and the staff; between the Administration and the parents and students; and between the District and its partners.

³ Even though 170 Parents opened the survey, the responses indicated that closer to 140 Parents actually completed most of the items in the survey.

Communication with Parents and Students

In addition to specific communications with Parents and Students through email, various student-specific meetings, phone conversations and correspondence, the Executive Director regularly attends PASE meetings, Parent Forums, SNAAKC meetings and periodic attendance at Parent Chats (parent groups established across center programs by parents of students who attend center programs). For a more detailed discussion of the Parents' perception of the communication they receive from the District regarding special education, please see the discussion regarding the results of the Parent Survey in Part Three, Section III, pp 16-19.

Communication with Staff

In an effort to engage all staff in meaningful dialog around national, state, local and urban issues in specialized instruction, the Executive Director hosted 4 "Conversation Cafés" events during the 2015-2016 school year, has Staff Forums set up twice during the 2016-2017 school year and attends staff meetings at the request of principals (both local and center based). The events were scheduled and announced to all staff through flyers distributed via email through their administrator by building and/or by role groups. Announcements were also made at staff meeting(s). For a more detailed discussion of the Staff's perception of the communication that they receive from the District regarding special education, please see the discussion regarding the results of the Staff survey in Part Three, Section III, pp 16-19.

The current and historical practice for communication with the more than 3,000 staff across GRPS is left primarily to building based administrators. Executive Directors share forward information to building based leaders where staff directly report, and the principals/building based leaders share/disseminate the information with the staff. The Quality Review Report from April 2012 found that, although the District Administration had an effective way of communicating with the media and the general public, the communication between the District Administration and staff had not yet been effective in eliminating the general mood of distrust and suspicion that had built up over the previous 5 years (2007-2012). The *Futures Education Reports* from 2010 also identified a staff perception that there was a lack of effective communication from the Administration to the staff and other stakeholders within the District. Although there have been demonstrable improvements and purposeful steps taken to address these communication issues, the results of the survey and some of the comments from the staff and others during the site visits confirmed a continued perception that staff are not always given timely and essential information regarding changes in special education assignments and initiatives that are set in motion by the Administration. This issue is further discussed where appropriate in the sections that follow and is, in part, the rationale for some of the recommendations in Part IV, pp 27-30.

Communication with Special Education Partners

The District’s Executive Director is also the primary point of communication with special education partners such as other local school districts, the Kent ISD and other community partners. The Executive Director personally attends or sends a District representative to regional planning meetings that are scheduled as a matter of course throughout the year. As GRPS is the largest of the districts in Kent County, it is a “region” unto itself.⁴ The Executive Director reached out to Region 3 Directors and, effective with the 2015-2016 school year, began regularly attending those Regional meetings. The Executive Director also participates regularly in other episodic meetings with special education partners as requested to address specific issues that may arise.

The District also has a collaborative relationship with 25 registered nonpublic schools located within the District regarding special education and supports that may be required under state and federal law or District practice. The Executive Director and/or designee participates in an annual meeting process that includes specific communications with nonpublic schools regarding the proportionate share requirement under IDEA and regarding the implementation of the Michigan Auxiliary Services Act.⁵ These annual meetings are coordinated and facilitated by Kent ISD across the county.

SECTION II. INPUT FROM THE PROGRAM REVIEW TEAM

During each of the Program Review Team meetings, the Program Review Team members provided feedback and input regarding the GRPS Special Education Program. In particular, the Team was asked to identify and provide input related to strengths of the GRPS program and also to identify and provide input related to areas where growth is needed. The members of the Program Review Team were broken into small groups of 5-7 members and given time to brainstorm and collaborate before providing responses. The members were then asked to report out to the larger group on their results. There was then a group discussion among the entire Program Review Team related to the input identified by the subgroups. The Executive Director and the Program Review Consultant did not provide input or participate in the Program Review Members’ discussions or the discussions among the subgroups.

As it relates to areas of strength, the Program Review Team identified several positive aspects of GRPS Special Education programming. Input was solicited specifically in areas

⁴ KISD is comprised of 20 local districts and 29 Charters. These are broken into 4 Regions. GRPS (alone) is Region 4. (See Kent ISD Special Education Directory 2016-2017).

⁵ Section 1412(a)(10)(A) of the IDEA and the federal regulations [34 C.F.R. §§ 300.133-300.136] require that public schools participate in a timely and meaningful consultation process with nonpublic schools located in the District regarding the proportionate share requirement. Grand Rapids also follows the Auxiliary Services Act, which provides certain students in registered nonpublic schools with a right to services under the Act. [See MCL 380.1296].

related to curriculum and instruction; staff and human resources; data collection; special education discipline; and GRPS Special Education Program’s relationship with the community it supports.

Curriculum and Instruction

With respect to curriculum and instruction the Program Review Team recognized that student growth and graduation rates have slightly improved and that this is an area of strength, but also an area for growth opportunity. The Program Review Team identified inclusion practices and curriculum changes in the Early Childhood programs and initiatives for alignment of the curriculum to pre-kindergarten readiness standards and common core curriculum standards as positive developments. The Program Review Team also highlighted the use of instructional coaches in the Early Childhood programs as an area of strength.

The Program Review Team reported the use of the Multi-Tiered System of Supports (“MTSS”) / Response to Intervention (“Rti”) / Student Success Team (“SST”) processes as areas of strength, but also identified this as an area of growth. In particular, the Program Review Team reported that MTSS / Rti / SST processes tend to differ from building to building and that more support for the process needs to be deployed, especially within general education classrooms. On this subject, the Program Review Team also reported that the renewed emphasis on the inclusion model and least restrictive environment is a step in the right direction, but that supports for interventions in those settings and training of staff need to be increased to ensure consistent and effective implementation. The Program Review Team also reported that the amount of time staff spends on paperwork seems excessive and has a tendency to interfere with instruction and student / classroom interventions.

Staff and Human Resources

As it relates to staff and human resources, the Program Review Members reported that the staff members are dedicated, hard-working, team players who have great pride in the GRPS system and a dedication to doing what is best for students. Staff collaboration was repeatedly identified as an area of strength, as was the specialized training and supports that the staff members receive within the Special Education Department. The Program Review Team Members also identified the wide variety of special education programs and supports that are available within the GRPS Special Education Program as strengths. The Team did report that the frequent movement of staff members from program-to-program and lack of staff member retention and high rate of turnover, coupled with teacher shortages, is an area of concern and an area of growth. The Team also reported that staff members perceive special education as a place (as opposed to an intervention or support) and that staff members have a reluctance to discontinue special education supports for students who may not need special education. The Program Review Team identified training for general education staff

in inclusion and the implementation of least restrictive environment as an area of growth. Finally, the Program Review Team identified communication between the Administration and staff at the classroom level as an area where growth is necessary.

Data Collection

With respect to data collection, the Program Review Team reported that the use of Tienet for data collection was an area of strength and that there appeared to be an understanding that staff members need to change the manner in which data is collected to target individual student growth. The Team identified several growth areas related to data collection, including the need to focus on outcomes rather than procedural compliance; the need to improve data collection within the MTSS / Rti / SST systems; the need to make data-based decisions related to eligibility, the evaluation and intervention process; and the relatively limited use of the Section 504 process to provide support to students who may have conditions that would be covered under Section 504.

Special Education Discipline

The Program Review Team reported that areas of strength were evident in regard to special education discipline, but that opportunities for growth exist as well. In particular, the Program Review Team identified the use of Restorative Practices, Mindfulness, Zones of Regulation and Positive Behavioral Interventions and Supports (“PBIS”) as areas of strength and that these practices tended to reduce and avoid the need for out-of-school suspensions. The Team also reported that the use of the Discipline Tracking Record (“DTR”) was helpful in monitoring and identifying the overuse of suspensions. The Team reported that, overall, the use of suspensions districtwide appears to be improving, but this is also an area of growth for the District. As it relates to behavioral interventions, the Program Review Team identified consistent implementation of PBIS as an area of growth for the District and the need for the District to expand the use of the MTSS and RtI processes to address behavioral challenges in the Tier 1 and Tier 2 settings.

Community Relationships

The Program Review Team reported that the community partnership in some buildings within the District is strong, but inconsistent from building to building. This sentiment was expressed with respect to the internal community partnerships (Administration to teaching and non-teaching staff) and the partnerships with Parents and partners outside of the school environment. The Team indicated that the use of individualized work-based learning and training sites for the older student population (18-26) is encouraged, but that this is also an area of growth. The Team identified the fact that some of the Student and Parent population within the GRPS is highly mobile, which undermines the development of stable partnerships and relationships with some Parents. The Program Review Team reported

positively regarding the use of Parent University Offerings and regarding the use of the Staff and Parent Learning Series through the GRPS Special Education Department. The Team did also report that the relative lack of Parent involvement, engagement and concern with respect to school was an area of growth for the District.

SECTION III. ANALYSIS OF SURVEY RESULTS

The summary results of the Staff and Parent Surveys are compiled in the Report Appendix under Tab 2. In addition, the individual comments by the Staff and Parents are included, in full and without alteration in the Report Appendix. The Survey Results were compiled in summary fashion by GVSU SCC. In addition, specific data sets were requested and/or recommended by the Program Review Consultant, in collaboration with the GVSU SCC. Those data sets are further discussed below in relation to each Survey.

Staff Survey Analysis

The Staff Survey responses, analyzed in the aggregate, revealed the following results. First, the most substantial responses based on raw numbers revealed that 43.5% of the responses came from the Elementary Staff; 17.14% of the responses came from the High School Staff; 15.81% of the responses came from the Middle School Staff; 9.90% of the responses came from the Post-Secondary / Transition staff (18-26 year olds); 8.19% of the responses came from the Early Childhood Special Education staff (3-5 year olds); 4.19% of the responses came from the Home Community staff (birth to 3); and 1.71% of the responses came from the Great Start Readiness Program staff. In general then, the highest number of responses came from the Elementary Staff and the lowest number of responses came from the Great Start Readiness program staff.

The Staff Survey Responses showed the following:

1. In general, Staff are aware of the various resources that are available through GRPS to support the learning of students with complex needs. [See the Summary Survey Results for Q.4, Appendix, Tab 2, D].
2. In regard to whether Staff has an understanding of the evaluation process for determining eligibility for special education programs and services, 71.56% of the staff said they strongly agree (33.70%) or agree (37.86%). Just over 15% of the staff disagreed (10.69%) or strongly disagreed (5.43%). [See the Summary Survey Results for Q.5, Appendix, Tab 2, D].
3. In regard to whether General Education Staff attend IEP meetings and have input into the programs and services for students with disabilities, just over 60% of the staff (60.30%) said they strongly agreed (21.88%) or agreed (38.42%). 24.63% of the

Staff neither agreed nor disagreed with this statement. [See the Summary Survey Results for Q.5, Appendix, Tab 2, D].

4. In regard to whether General Education Staff have sufficient information to understand and implement IEPs in the general education classroom setting, 34.88% of the staff strongly agreed (7.24%) or agreed (27.64%), while a comparable percentage, 33.32%, disagreed (23.19%) or strongly disagreed (10.02%). [See the Summary Survey Results for Q.5, Appendix, Tab 2, D]. Reading the responses in questions 2 and 3 together, the data demonstrate that while 60% of staff agreed that general education staff attend IEP meetings and have input, only 34% of the staff agree that the general education staff have sufficient information to understand and implement IEPs.
5. Staff overwhelmingly reported that they have a clear understanding of the expectation to educate students with IEPs in their least restrictive environment. 80.14% either strongly agreed (38.43%) or agreed (41.71%). Only 10.74% of the staff disagreed (7.83%) or strongly disagreed (2.91%) with the statement. Many of the individual comments to the survey emphasize the challenges that they face in attempting to educate students in LRE (including a need for additional time, resources and training); however a significant majority of the staff clearly recognized this as an expectation. As reported in more detail in the Section on Least Restrictive Environment below, the District and its Executive Director have made structural changes to the Early Childhood Special Education Classroom Programs with the stated purpose of facilitating inclusion / access to least restrictive environment. While this change in structure was likely long overdue based upon best practice and adherence to LRE at this critical stage of student development, the staff impacted by the changes felt that the communication and plan for these changes was too abrupt and not strategically planned for a smooth transition. This issue is most certainly an issue that was identified in the survey results and in the individual comments, particularly from staff most directly affected by the change in the structure.
6. In regard to whether Special Education Staff have access to sufficient resources and curriculum to educate students on their caseload, 41.91% strongly agreed (8.76%) or agreed (33.21%), while 34.49% disagreed (23.18%) or strongly disagreed (11.31%). The Staff Respondents were equally divided when asked whether instructional staff were appropriately trained to educate students with complex needs with IEPs, with 40.80% strongly agreeing (9.11%) or agreeing (31.69%), while 34.79% disagreed (27.32%) or strongly disagreed (7.47%). This division in regard to the adequacy of resources, curriculum and training of the Special Education Staff is juxtaposed with the overall Staff endorsement of the view that instruction is a GRPS priority for all

students, with 76.69% of the Staff Respondent's strongly agreeing (36.25%) or agreeing (40.44%).

7. Staff was also skeptical of whether the assessments they are using are aligned to the curriculum. 34.50% of the staff either strongly agree (6.46%) or agree (28.04%) that assessments are aligned to the curriculum. 38.75 % of the staff were unsure whether assessments are aligned to the curriculum and 26.75% either disagreed (17.71%) or strongly disagreed (9.04%). While it is certainly possible that non-teaching staff (over 50% of the Staff Respondents) may not be aware of whether assessments are tied to the curriculum, the staff results demonstrate a need for review of the District assessments with an emphasis on connection to the curriculum where appropriate and possible.
8. As it relates to the overall goal in relation to graduation or a certificate of completion, 70.27% of the staff endorsed the statement that the goal is to get their students to graduation, while 29.73% report that the student goal is for a certificate of completion. While this data may also be a bit misleading in terms of the representation of staff who endorsed the certificate of completion, if the percentage of staff reporting that expectation were to roughly approximate the student population who actually receive a certificate of completion, the percentage of students receiving a certificate of completion would be well above the state target and would partially explain the depressed graduation rates for special education students in GRPS. This data is also a reference point for the recommendation that the District review and revise its policies and procedures and that the District provide training of relevant staff related to certificates of completion to ensure that the students and staff have clear, objective, measurable and verifiable standards and expectations related to earning certificates of completion.
9. Staff was also asked to respond to the statement that general education and special education teachers collaborate to develop and ensure IEP implementation. 43.32% of the Staff Respondents strongly agreed (8.59%) or agreed (34.73%). Nearly one third of the respondents neither agreed nor disagreed (30.53%) and 26.55% either disagreed (17.37%) or strongly disagreed (8.78%). This data highlights the need for the District to include some purposeful and planned campaign to discourage the continuing perception among staff and others that special education and general education are two separate systems. While this phenomenon is not unique to GRPS and presumably is not purposeful, as part of its 3-5 year Strategic Plan for Special Education, the District should include the unification of the educational system as a long term goal.

10. As it relates to the burden that staff feels from the paperwork associated with special education, 32.79% of the staff reported that there were sufficient resources to assist in meeting the paperwork requirements, with 5.68% strongly agreeing and 27.11% agreeing with the statement. 39.75% of the staff either disagreed (25.46%) or strongly disagreed (14.29%). Just under 28% of the staff (27.47%) were not sure if they have sufficient resources to assist in meeting the paperwork requirements. This data is reinforced by the concerns related to the paperwork burden that was reported by the Program Review Team during its meetings and also, in this Author's experience, a common complaint and concern of other Districts. As part of the 3-year Strategic Growth Plan for Special Education, GRPS should conduct a review of the paperwork that is associated with the implementation of its special education system to eliminate unnecessary, confusing or archaic paperwork.
11. The results demonstrate that 57.85% of staff strongly agreed (15.33%) or agreed (42.52%) that they know who to contact to get questions or concerns resolved. The responses also demonstrate that 25.55% of the staff disagreed (17.34%) or strongly disagreed (8.21%) with the statement.
12. Staff responses show that only 34.74% of the staff agree (26.84%) or strongly agree (7.90%) that the District Administrators are responsive to questions or concerns regarding special education programs and services. 37.13% disagree (20.40%) or strongly disagree (16.73%) that District Administrators are responsive to questions or concerns, while 28.13% are not sure. Anecdotal statements from some of the staff during the on-site visits substantiate this as an area of growth, as does the feedback from the Program Review Team during Program Review Team discussions.
13. Staff responses regarding recent Professional Development also reveal this as an area of growth. When asked to respond to the statement that Professional Development offerings provided the staff with knowledge and support for meeting the needs of their students, 29.85% of the staff either agreed (25.27%) or strongly agreed (4.58%), while 40.30% either disagreed (23.08%) or strongly disagreed (17.22%). The individual comments from the Staff Respondents provide more specific comments about the professional development and ideas for professional development from the perspective of the staff. The District should further analyze the data from the narrative comments of the staff and take those comments into account when planning professional development, especially where common responses are repeated. The District should include in its 3-5 year Strategic Plan, a component that addresses the manner in which professional development opportunities are identified and selected. The Strategic Plan should have specific and concrete connections between the Professional Development and the overall strategic growth goals of the Plan.

In addition to the specific questions that were developed for staff responses, the staff were also given an opportunity to provide narrative responses related to professional development needs and challenges (Q-8), strengths of the special education department (Q-9) and areas of need or growth within the special education department (Q-10). The narrative responses varied from 360 staff responses (Q-8) (challenges), to 381 staff responses (Q-9) (areas of strengths), to 175 staff responses (Q-10) (areas needing improvement). These narrative responses contain some identifiable patterns that should be further studied and considered in implementing some of the recommendations set forth below.

Parent Survey Analysis

By comparison to the staff surveys, the Parent Survey yielded far fewer responses. The low response rate from the Parent Community is of concern and further evidence of the opportunity for GRPS Special Education Department to work more purposefully on a communication strategy designed to increase Parental Involvement in their children's education.

The data show that 170 parents responded to the Survey. Those Parents represented the following grade / age levels by comparison:

Preschool	16.08%
Elementary	33.57%
Middle School	07.69%
High School	19.58%
Post-Secondary / Transition	23.08%

The Parents were also asked to identify the area of their Child's disability. Representing the 13 recognized categories of disabilities, the Parents responded as follows:

Speech and Language	18.06%
Hearing Impaired	02.78%
Deaf/Blind	00.00%
Visually Impaired	02.08%
Cognitively Impaired	17.36%
Specific Learning Disability	06.94%
Otherwise Health Impaired	04.17%
Physically Impaired	01.39%
Emotionally Impaired	01.39%
Autism Spectrum Disorder	23.61%
Severely Multiply Impaired	18.75%
Traumatic Brain Injury	00.00%
Early Childhood Developmental Delay	03.47%

The overall results in terms of parental participation suggest that the Parents of students with lower incidence, higher need disabilities responded at a higher rate than students with higher incidence disabilities. This theory is further supported by the fact that, of all Parent Respondents, 58.21% reported that the goal for their child was to graduate, while 41.79% endorsed the goal as a certificate of completion.

On the whole, the Parents who did respond to the survey reported that they were aware of the special education process and were included within the process. For example, 93.66% of the Parents strongly agreed (58.45%) or agreed (35.21%) that they were aware of their child's right to a free appropriate public education. Just over 68 percent of Parents strongly agreed (24.11%) or agreed (43.97%) that they were aware of the resources at GRPS to support their children's learning needs. A very high percentage of Parents (84.29%) strongly agreed (36.43%) or agreed (47.86%) that they were aware of the evaluation process. In addition, over 95 percent of the Parents strongly agreed (50.35%) or agreed (44.68%) that they were included in the IEP process.

As it relates to the actual programs and services, 66.43% of the Parents strongly agreed (30.00%) or agreed (36.43%) that the IEP was meeting their child's needs. Of the remaining Parents, 17.86% were not sure, 11.43% disagreed and 4.29% strongly disagreed with this statement. As it relates to the overall satisfaction with the special education programs and services, 61.97% strongly agreed (24.65%) or agreed (37.32%) that they were satisfied with the programs and services, while 14.08% were unsure and 20.42% disagreed that they were satisfied. With respect to the progress their children were making on IEP goals and objectives, 67.60% either strongly agreed (23.94%) or agreed (43.66%) that they were satisfied with their child's progress, while 17.61% were unsure and 11.97% did not agree that they were satisfied with their child's progress.

The Parents were also asked to comment on their perception of the level of staff training, staff collaboration and their child's access to the general education curriculum and environment. Nearly 75 % of the Parents reported that they strongly agreed (32.39%) or agreed (42.25%) that the staff were appropriately trained to provide their children with the programs and services they need at school, while 14.08 % were unsure. Just over 10 % of the Parents disagreed (6.34%) or strongly disagreed (4.93%) that staff were appropriately trained. In regard to collaboration between general education and special education staff, 48.93% of the Parents strongly agreed (23.40%) or agreed (25.53%) that the general and special education staff work together to make sure they implement IEPs. Just over 38 percent were unsure whether general and special education staff work together to implement IEPs, while 8.51% disagreed and 4.26% strongly disagreed with the statement. Better than half of the Parents (58.57%) strongly agreed (23.57%) or agreed (35.00%) that they were satisfied with their child's access to the general curriculum, while 26.43% were not sure that they were satisfied with such access. A smaller percentage (14.16%) disagreed (8.45%) or strongly disagreed (5.71%) that they were satisfied with their child's access to the general curriculum. A very similar profile emerged from the Parents as it

relates to their view that the IEP Team discusses options to teach their child in the general education environment with 57.74% of the parents strongly agreeing (23.94%) or agreeing (33.80%) that the IEP Team discusses those options. The remaining Parents were unsure (27.46%) did not agree (8.45%) or strongly disagreed that the IEP Team discusses options to teach their child in the general education environment.

The Parents were asked to comment on their communication with the District staff and administration and the Parents' participation in District-provided training or information sessions. Over 88 percent (88.81%) of the Parents strongly agreed (52.45%) or agreed (36.36%) that they have the opportunity to communicate with their child's staff on a regular basis. As it relates to District Administrator's responsiveness to Parent questions or concerns regarding their child's special education, 52.82% of the Parents strongly agreed (21.83%) or agreed (30.99%) that District Administrators are responsive. Of the remaining Parent responses, 26.76% were not sure, while 11.97% disagreed and 8.45% strongly disagreed that District Administrators were responsive to their questions or concerns regarding their child's special education programs and services. That said, 70.92% of the Parents strongly agreed (34.04%) or agreed (36.88%) that Administrators and Teachers encourage parent involvement in order to improve services and results for their child. The remaining parents were unsure (17.02%), disagreed (7.80%) or strongly disagreed (4.26%) that they were so encouraged. The Parents were then asked whether they had attended a parent training or information session provided by GRPS. Of the Parent respondents, 38.03% strongly agreed (12.68%) or agreed (25.35%) that they had attended such training or information sessions. The remaining Parents were unsure (23.94%), disagreed (29.58%) or strongly disagreed (8.45%).

Finally, the Parents were also given an opportunity to provide any additional feedback they wished to provide. The Parents' additional feedback was mixed. Some Parents expressed positive comments regarding the teaching staff and the programs or particular school buildings where their children were being educated. Other Parents expressed concerns related to a perceived lack of stability in program locations; a perceived lack of communication or lack of input into decisions that relate to their children; concerns about changes in "summer programming" – presumably extended school year; and concerns about potential cuts or perceived funding inequities for special education programs. Although caution should be exercised in drawing broad conclusions from the small Parent data sample, the Parental comments and concerns should be considered in developing the Strategic Plan recommended at the conclusion of this Report.

SECTION IV. CENTER-BASED PROGRAMS

In addition to operating local special education programs for its students who attend a GRPS building, the District operates center-based programs for students eligible to attend throughout Kent Intermediate School District. Of the approximately 3,875 special education students in Grand Rapids Public Schools, approximately 36% (approximately 1,395 students) receive

Center-Based Programming. The Center-Based Programs are located at 11 different sites throughout the District. Within these sites, the District operates 19 Autism Spectrum Disorder Classrooms; 14 Early Childhood Special Education Classrooms; 26 Emotionally Impaired Classrooms; 14 Moderately Cognitively Impaired Classrooms; 11 Severely Cognitively Impaired Classrooms and 19 Severely Multiply Impaired Classrooms; 6 Deaf and Hard of Hearing Classrooms and 3 Physical Impairment Classrooms.

The Program Review Consultant was provided with data regarding the staffing and financial elements of the Center-Based Programs. The 2010 *Futures Education Report* for Center-Based Programs contained findings and recommendations, some of which appear to have been implemented and some of which are still areas of growth. In particular, the Report contained findings and recommendations related to the lack of uniformity and consistency in returning students to neighborhood schools; inefficiencies with administrative and programmatic structure; the need to assess and properly adjust staffing levels and the effective use of professional staff among the programs.

A predictable result of the GRPS operating Center-Based Programs for the Kent ISD constituency is the impact on GRPS State Performance Plan Indicators, such as the least restrictive environment indicators, graduation and dropout indicators and suspension and expulsion indicators; as well as a noted impact on Human Resources.⁶ When the graduation and dropout rates are disaggregated by disability category, the disability categories that are not typically part of the Center-Based Program student population graduate at a far higher rate than those in Center-Based Programs. [The preliminary results of the disaggregated data for the 2014 and 2015 cohorts are attached in the Appendix, Tab 3].

The MI School Data Portraits which are further discussed throughout this Report and the data collected by the GRPS confirm that the GRPS special education population is defined, in part, by the students who are placed with Center-Based Programs and the nature of the intense need for special education classroom support that naturally exists with this population of students. The GRPS should continue to study and, where possible, disaggregate the Center-Based Program

⁶ The District provided preliminary data sets that disaggregated graduation and dropout rates of GRPS special education students from non-resident special education students attending Center Based programs. The data substantiated that, when disaggregated, GRPS special education student graduation rates for the 2014 (4 and 5 year graduation rates) and 2015 (4 year graduation rates) are higher. For example, for the 2014 (4 year graduation rates), the rate for all special education pupils (including non-resident special education students) is 19.41%. When that same data is disaggregated to special education students who are GRPS special education students, the rate increases to 29.36%. For the 2014 (5 year graduation rates), the rate for all special education pupils is 22.94%. When that same data is disaggregated to special education students who are GRPS special education students, the rate increases to 33.94%. The same phenomenon occurs for the 2015 (4 year graduation rates), which for all special education pupils is 20.21%, but when disaggregated to GRPS special education students, the rate increases to 28.03%. Similar, but not consistent, results occur when GRPS special education student dropout rates are disaggregated from the total special education student population at GRPS, including non-resident students. [Appendix, Tab 3].

student and program data from the local student and program data regarding these indicators in an effort to develop specific and measurable baseline and target data for future strategic planning and growth decisions within the special education department.

SECTION V. GRPS LOCAL EDUCATIONAL PLACEMENTS AND LEAST RESTRICTIVE ENVIRONMENT

The Grand Rapids Public Schools operates special education programs in numerous settings and locations and at numerous buildings. Based upon the Fall 2015 Building Demographics, the District operates a robust continuum of alternative educational placements. The District operates programs in the North Park Montessori Early Childhood Campus at Wellerwood; 25 Elementary School Buildings (3 K-8; 14 PreK-5; 7 PreK-8; 1 K-7); 4 comprehensive Middle Schools; and 7 High Schools. The District also operates an alternative school (Bethany), the Grand Rapids Public Museum School and Project Search (a post-secondary transition to work program).

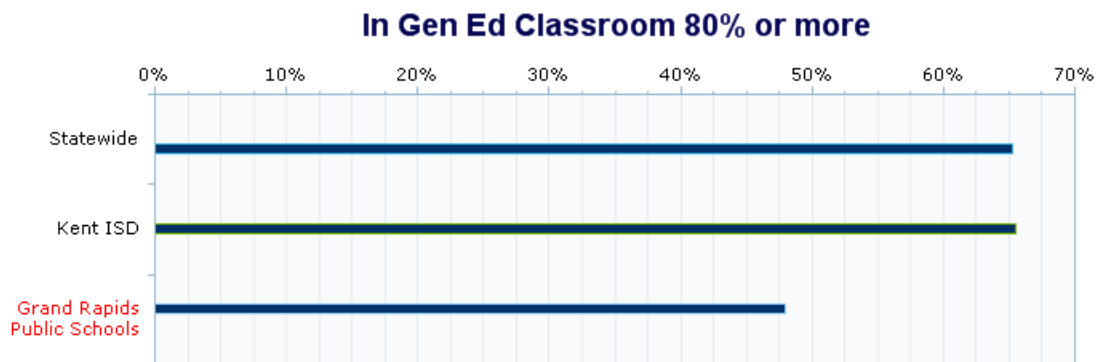
The District operates three levels of resource programming and several categorical classroom programs. The level of resource programs are based upon the level of support needed for those programs. Level 1 Resource Programming is the most traditional program model; students exhibit independence across environments and spend a majority (more than 80%) of their day with general education peers. Level 2 Resource Programming is for students who exhibit a moderate level of need for instructional support across environments and may spend 40-80% of their day with general education peers. Level 3 Resource Programming is for students who exhibit a need for ongoing support for instruction across environments and may spend 0-39% of their day with general education peers. Another feature of the shift to levels of need is removing the disability specific language to “programming”. By identifying programs based on levels of need, students are less likely to be subject to bias or preconceived notions setting them up for success. The District operates 72 L1 Resource Programs, 6 L2 Resource Programs and 17 L3 Resource Programs throughout the GRPS. The District also operates its own categorical programs with the following breakdown: 8 Moderate Cognitively Impaired Programs; 16 Autism Spectrum Disorder Classroom Programs; and 11 Emotionally Impaired Classroom Programs. As it relates to the nature of the Center-Based Programs, the District operates 19 ASD Classroom Programs; 14 Early Childhood Special Education Classroom Programs; 26 Emotionally Impaired Classroom Programs; 14 Moderate Cognitively Impaired Classroom Programs; 11 Severely Cognitively Impaired Classroom Programs; 19 Severely Multiply Impaired Classroom Programs, 3 Physically Impaired Classroom Programs; and 6 Deaf and Hard of Hearing Classroom Programs.

A review of the MI School Data Portraits for the GRPS for the 2013-2014 and 2014-2015 school years related to the educational placement in comparison to State Performance Target Indicators for Least Restrictive Environment was conducted as part of the Program Review. The State Performance Plan collects target data on three performance indicators. The first Indicator (SPP 5a) measures the percentage of students who spend 80% or more of their time in general

education; the second Indicator (SPP 5b) measures the percentage of students who spend 40% or less of their time in general education; and the third target (SPP 5c) measures the percentage of students in separate special schools.

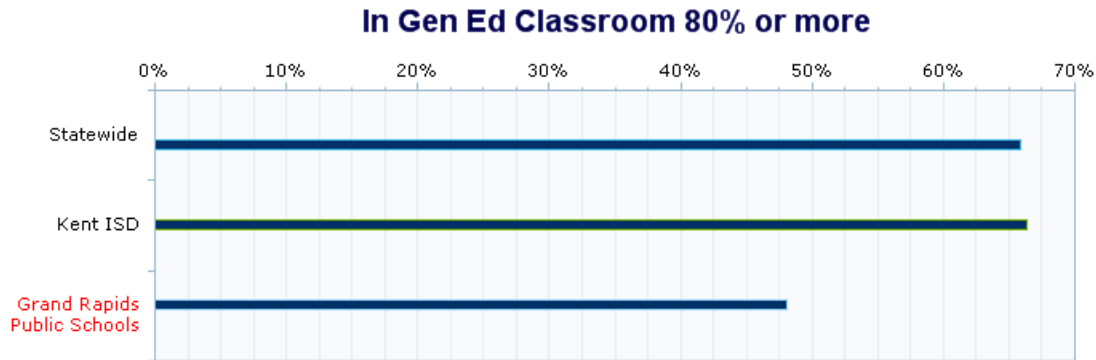
GRPS MI School Data for 2013-2014 and 2014-2015 (students aged 6-21) demonstrates that GRPS is below the state percentage and ISD percentage for SPP indicator 5a and above the state percentage and ISD percentage for SPP indicators 5b and 5c. In essence then, a lower percentage of GRPS students are spending 80% or more of their time in general education than the percentage of state or ISD students. In addition, a higher percentage of GRPS students are spending less than 40% of their time in general education than the percentage of state or ISD students. And finally, a higher percentage of GRPS students are placed in separate special education schools than the percentage of state or ISD students. An obvious and credible explanation for a substantial part of this data discrepancy for GRPS lies in the fact that GRPS operates Center-Based Programs for eligible students located throughout Kent ISD.

Specifically, for 2013-2014, the MI School Data shows that the percentage of students statewide who met Indicator 5a (80% or more time in general education) was 65.23%, the Kent ISD percentage was 65.44%, but the GRPS percentage was 47.96%.



As it relates to Indicator 5b (40% or less time in general education), 11.22% of the students statewide were in this category, 12.89% of the Kent ISD students were in this category, but 21.21% of the GRPS students were in this category. As it relates to Indicator 5c (separate public or private special education schools), 4.73% of the students statewide were in this category, 5.14% of the Kent ISD students were in this category, but 20.57% of the students in GRPS were in this category.

As it relates to these same indicators for 2014-15, the data was comparable. 65.9% of the state students met indicator 5a, 66.3% of the Kent ISD students met indicator 5a, while 48.11% of the GRPS students met indicator 5a.



As it relates to Indicator 5b (40% or less time in general education), 11.08% of the students statewide were in this category, 12.15% of the Kent ISD students were in this category, but 21.95% of the GRPS students were in this category. As it relates to Indicator 5c (separate public or private special education schools), 4.68% of the students statewide were in this category, 5.76% of the Kent ISD students were in this category, but 22.84% of the students in GRPS were in this category.

The comparison of the percentages from 2013-2014 to 2014-2015 showed a minimal increase in the percentage of GRPS students who met indicator 5a, a minimal increase in the students who were in general education for 40% or less of the time and a slight increase in the percentage of students who were in separate public or private special education schools. Once again, it is submitted that the high number of Center-Based Programs and the high student numbers enrolled in and attending the Center-Based Programs has a tendency to cloud the GRPS data related to these indicators. Prospectively, disaggregation of these data sets, even if only for internal review and analysis, is recommended to clearly identify and measure progress on the State Performance Plan Indicators and the areas of growth or improvement from both the local program and Center-Based Program perspective.

SECTION VI. THE EARLY CHILDHOOD TRANSFORMATION PROJECT

In order to address concerns related to least restrictive environment and inclusion opportunities for Pre-Kindergarten and Early Childhood Special Education (ECSE) Program students, in the fall of 2015, the District began to restructure and relocate the ECSE program options within the GRPS. More specifically, as part of the Transformation Plan (Phase II) and the need to increase the inclusion opportunities for the birth to 3 and pre-kindergarten population, GRPS decentralized and relocated its locally-operated ECSE programs from the Ken-O-Sha VanAuken location into local neighborhood schools within the four regional quadrants of the District. Each regional quadrant was to include a hub school and a dedicated team of staff, including an early childhood specialist, an early childhood special education teacher, a child care worker and a team to implement a Multi-Tiered System of Supports (MTSS) within the quadrant. The MTSS Team would include an early childhood intervention

coach; an early childhood inclusion coach (Hub School ECSE Teacher); a speech and language therapist; and related services staff as assigned to meet student needs within the quadrant. Finally, a 5th location for GRPS ECSE would be established at the Wellerwood School for 3-year-olds, whose peers would be comparable to the 3-4-5 year-olds educated in the Montessori Model called Children's House.

To provide for greater opportunities for inclusion, the ECSE classroom programs were located within neighborhood schools that had Great Start Readiness Programs. In addition, the ECSE programs would be located in buildings that had Head Start, Montessori or other existing pre-school programs to provide additional opportunities for ECSE children inclusion and interaction with nondisabled or more typically developing peers. The rationale for the change in the structure and implementation of the ECSE system in GRPS grew out of the Quality Review Report, the Transformation Plan along with a state and federal renewed emphasis on the importance of exposure to nondisabled and typically developing peer models at the early stage of childhood development.⁷ The restructuring was also clearly motivated by the discrepancy between the State Targets for least restrictive environment for the early childhood preschool (age 3-5) population and the GRPS program-based data. For example, the State Targets for ECSE preschool participation in regular early childhood programming (State Performance Plan Indicator 6a) are set at just over 28% in 2013-2015 and 2014-2015. GRPS data showed less than 8% of the ECSE preschool students had participation with regular early childhood programming. In addition, State Targets for the percentage of ECSE preschool students in separate special education classes, schools or facilities was under 44% (State Performance Plan Indicator 6b), while GRPS data showed more than 83% of the ECSE preschool students were in separate special education classes, schools or facilities.

The Phase II Transformation Plan for Pre-Kindergarten students was implemented in September of 2015. Although the restructuring of the GRPS ECSE model was clearly justified by the data and the legally-required emphasis on least restrictive environment for preschool children, the manner in which the restructuring was communicated to and implemented by the District resulted in staff complaints and demonstrable frustration from staff. Although it is predictable and natural for staff to react negatively to changes in their classroom routines, assignments, programs and locations, a vocal and somewhat public backlash of staff occurred. This backlash manifested itself in verbal complaints, letters to the Superintendent and the Board of Education and overt criticism of the special education department and the GRPS Executive Director. During site visits, the Program Review Consultant discussed this issue with the ECSE

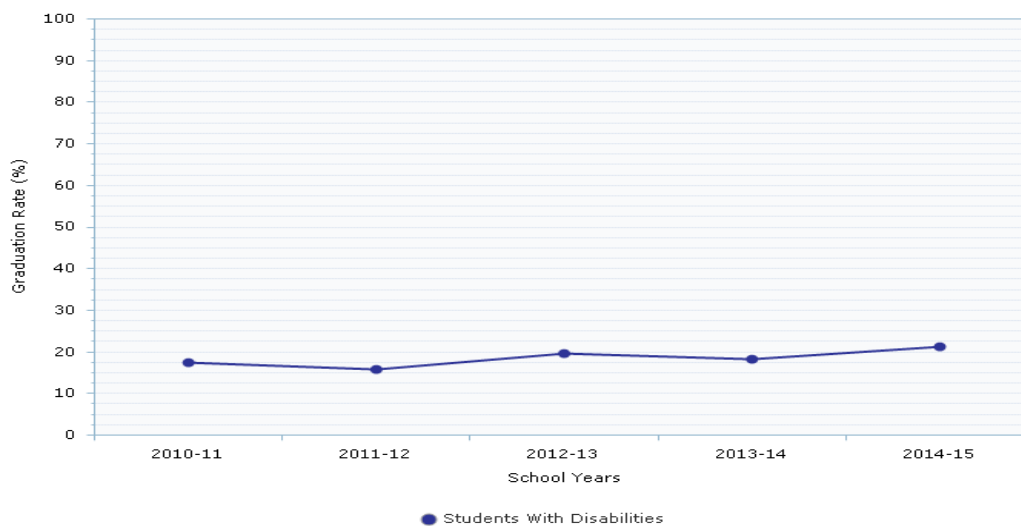
⁷ The federal regulations for IDEA Part B students (including ages 3-5) require that student placements be individualized and in compliance with the least restrictive environment provisions of the law. The federal policy that emphasizes the importance of preschool least restrictive environment and inclusion opportunities for young special education students was confirmed by the United States Department of Education, Office of Special Education Programs (OSEP) in a letter to the field from February of 2012. (See generally, *Letter to Colleague from OSEP Director Musgrove*, 58 IDELR 290 (February 29, 2012)).

classroom program staff, some of whom continued to express frustration and concern about a perceived lack of input, communication, coordination and planning related to the restructuring. The results of the staff surveys also reveals continued discontent and criticism of the special education department among some of the staff regarding the ECSE classroom program restructuring.

The GRPS Administrative and staff experience related to the ECSE restructuring project should be taken into account when developing and implementing the Special Education Strategic Plan that is a central part of this Report’s recommendations. The Executive Director and GRPS Special Education Department have candidly acknowledged that improvements in communication and stakeholder participation can be made moving forward. That said, the *Futures Education Report* from 2010 and the Quality Review Report from 2012, identified a perceived distrust of Administration and perceived lack of input and participation by staff that has existed for several years prior to the ECSE restructuring.

SECTION VII. ANALYSIS OF SPECIAL EDUCATION STUDENT OUTCOMES

The Graduation and Dropout Rates for GRPS were available for 2010-2011 through 2014-2015 school years. In particular, Graduation and Dropout Rates for GRPS special education students (4 year cohort) were reviewed as part of the Program Review. As it relates to Graduation Rates, the data show as follows:



The data show that Graduation Rates for students with disabilities among 2012-2013; 2013-2014 and 2014-2015 fluctuated but improved in 2014-2015. Specifically, the data show that for 2012-2013, students with IEPs (4 year cohort) graduated at a rate of 19.59%. For 2013-2014, the rate went down to 18.18%. Finally, in 2014-2015, the reported GRPS graduation rate for students with disabilities rose to 21.31%. Student-with-Disability-Dropout Rates also fluctuated but

improved in 2014-2015. The data show the rate went from 25.77% (2012-2013), to 29.55% (2013-2014) and, finally, to 19.13% in 2014-2015.

As part of the Program Review, the Program Review Consultant requested data regarding the use of the Personal Curriculum for students with disabilities. Although it did not appear to be an area where reliable data was readily available (an area of growth), the data that was provided demonstrated that the Personal Curriculum appears to be underutilized by the District High Schools as an option to facilitate graduation of special education students with regular diplomas on a timely basis (with their cohorts). The Program Review Team confirmed that the Personal Curriculum and Certificate of Completion practices and procedures are areas of growth. The Program Review Team also confirmed (and the surveys of staff and parents appear to substantiate) that growth in regard to Transition Services and options will also continue to be necessary.

On the whole, while the District's Graduation and Dropout Rates for students with disabilities are growth areas for the District, progress is being made in these crucial student outcomes. As part of the development, review and implementation of the Strategic Plan referenced in the Recommendations portion of this Report, the District should further dissect and study its graduation and dropout data to determine the graduation rate of GRPS students, disaggregated from the non-GRPS students who attend Center-Based Programs. The GRPS student with disabilities graduation rates should then be reviewed by building and by disability area to probe for growth opportunities over the life of the Strategic Plan.

SECTION VIII. ANALYSIS OF STUDENT DISCIPLINE SYSTEM

The GRPS student discipline system as it relates to students with IEPs is improving, but continues to be an area of growth. A key indicator that GRPS is improving is the fact that, for the first time in 6 years, the District has not been identified as significantly disproportionate with respect to incidences of suspension for students with IEPs. The improvements to the GRPS special education discipline process that were put into place through the use of coordinated early intervening services, the Discipline Tracking Record System and the use of interventionists should remain in place. That said, a state complaint from 2015-2016 and recent issues with the special education discipline process internally reveal that the District is still in need of improvement and professional development in the area of special education student discipline.

The District provided the Program Review Consultant with student suspension data for the 2014-2015 and 2015-2016 school years.⁸ The suspension data demonstrate that the District's use of suspensions as a response to student behavior, on the whole, has decreased. The data for all students with IEPs shows that suspensions have been reduced in nearly every demographic

⁸ The District also provided data for the 2016-2017 school year, which was in-progress through November 2016. The data in all key areas addressed above appear to be on track, with a projected mild reduction in suspensions for nearly all areas.

area. (African American Students with IEPs and African American Males with IEPs; Hispanic Students with IEPs and Hispanic Male Students with IEPs; White Students with IEPs). The data also demonstrate a slight increase in suspensions for White Males with IEPs and an increase in the number of students with IEPs who have two or more suspensions.⁹ Grade-level suspension data from the two school years reveals that the highest rates of suspension within the GRPS are occurring in grades 6-9, with the 9th grade suspensions the highest by a substantial margin.¹⁰

While suspensions across the District appear to be on the decline, the District should continue to devote resources, including targeted professional development, to certain portions of the special education discipline process. Specifically, the use of the DTR appears to be inconsistent from building to building and the “counting” process related to suspension days and removals appears to be inconsistent within the District as well. The monitoring of “removals”, the pattern of exclusion and the use of interim alternative educational settings are areas where growth can and should occur. While the Program Review Team reported that there was improvement in the use of PBIS and other behavior interventions and methodologies, the Team also reported that the implementation was inconsistent among the District buildings. A recently-enacted state law regarding the emergency use of restraint and seclusion and amendments to the “zero-tolerance” sections of the Revised School Code will be an area of growth and areas for professional development, not just for GRPS, but for all schools across the State of Michigan.

GRPS should be commended for its intentional and targeted focus on the reduction of suspensions and removals as an intervention for behavior. The fact that GRPS is “out of” the significant disproportionality cycle for the time being is a significant accomplishment and cause for celebration. That said, more growth in this area is possible and more growth is necessary, which will occur with continued professional development; improvement and uniformity in the data collection and implementation of the DTR system; and targeted deployment of human resources to assist in collecting data and monitoring the use of suspensions and removals throughout the District.

PART FOUR – RECOMMENDATIONS

1. Develop a Special Education Strategic Plan to be implemented over a 3-5 year timeline.
 - a. Design, develop, and implement the Strategic Plan in a manner that is consistent with the existing district school improvement plan with input from

⁹ A suspension incident is recorded as an incident, regardless of the number of days associated with the suspension. Thus, a suspension that is reported as “two or more” suspensions will not further illuminate the number of days that student received.

¹⁰ The 9th grade suspension data showed that, in 2014-2015, there were 1,543 recorded suspensions districtwide. For 2015-2016, the number was reduced significantly to 978 recorded suspensions. Even as reduced in 2015-2016, the suspensions in 9th grade outnumbered the next highest grade-level suspensions (8th Grade) by 114 suspensions.

stakeholders, under the leadership of the Executive Director of Special Education.

- b. The overarching goal of the Strategic Plan is to break down the barriers that exist (whether real or perceived) around programming for students with IEPs, and build inter- and intra-department relationships.
- c. Include a communication and implementation plan.
- d. Include a mechanism for adjusting goal(s) when the data demonstrate the need to do so, where the priorities of the District otherwise require it, or when necessary to respond to changes in the law or its implementation.
- e. Data derived from this Report would suggest key goal areas within the Strategic Plan could include:
 - i. Graduation Rates for students with IEPs;
 - ii. Least Restrictive Environment (LRE) data, with a long-term, well-defined and well-communicated plan to move toward State targets for LRE and best practices for inclusion;
 - iii. Special Education Discipline, including a plan to continue to reduce suspension and expulsion at both the building and district level and a plan to avoid the recurrence of significant disproportionality;
 - iv. Curriculum initiatives that emphasize the identification and implementation of curriculum and assessments that are demonstrably aligned to the state standards, with specific emphasis on effective techniques to accommodate and assess student need.
 - v. In conjunction with other ongoing technology reviews, assessment and improvement initiatives, develop a goal based upon research that supports and provides guidance regarding instructional/assistive technology needs to promote effective classroom and teaching practices for students with IEPs;
 - vi. Assurance of district wide, aligned professional development, taking into account the Staff Survey Results and the input from the Program Review Team. The professional development should include learning that:
 1. de-emphasizes the separation between special education and general education staff;
 2. emphasizes staff proficiency in grade level curriculum and methods of accommodating and modifying curriculum to facilitate student access to and progress in the general curriculum, while still expecting rigor and appropriate student outcomes; and

3. takes into account the key areas related to data collection, implementation of IEPs, student discipline, least restrictive environment, inclusion, and other relevant indicators and targets.
2. Review the *Futures Education Reports* from 2010, including most notably, the recommendations section of both the GRPS local and Center-Based Program Reports. Several of the recommendations in those reports are supported by the data and results of the current Program Review. To the extent appropriate, portions of the recommendations from the *Futures Education Reports* should be included in the Strategic Plan.
3. As it relates to deployment and use of staff, the District revealed that a process of realignment of local Special Education Supervisors is already underway to address previous issues related to duplication of effort and an operational limitation on the Supervisors' exposure to the broadest portion of the K-12 system as possible. In addition, consider the data-based and Program Review Team perspective (also confirmed in the *Futures Education Report*) that there is significant room for growth in the coordination and communication at the building level between general education and special education administrators and staff. Although this is not a challenge that is unique or more pronounced within GRPS, a more-unified GRPS system will assist in addressing the renewed state and federal agency emphasis on least restrictive environment and expectations for system-wide data collection and documentation of IEP implementation.
4. Study the data referenced and included in this Report and Appendix and the implications that data presents in the context of Center-Based Program operation. In particular, explore Grand Rapids Public Schools ongoing operation of Center-Based Programs on behalf of other Kent ISD districts or the Kent ISD. Review the data implications to GRPS as it relates to the impact operation of these programs has on the GRPS special education population for educational setting (LRE); GRPS special education student graduation and dropout rates; suspension / discipline data; and Human Resources capacity.
5. Grand Rapids Board of Education Policies, Procedures and Administrative Guidelines do not appear to include criteria through which a certificate of completion would be earned / awarded. Therefore, it is recommended that the Grand Rapids Public Schools and the Board of Education define and develop a specific set of criteria and expected outcomes for students with disabilities, who may receive a certificate of completion or other alternative to a regular High School Diploma.
6. Review current policies and procedures for the use of the Personal Curriculum for students with IEPs. The data from the District strongly suggests that the Personal Curriculum is being underutilized and may assist in increasing opportunities for graduation of students with a disability with a regular high school diploma.

7. Explore the interplay between the IEP process and the Section 504 process and evaluate current Section 504 policies, procedures and practices.
8. Consider a 3 year review cycle for the Program Review Process.

CONCLUSION

On behalf of the Program Review Team, this Consultant wishes to express sincere gratitude to the Grand Rapids Public Schools Board of Education, the Superintendent, the Administration and the Staff and Parents who participated and assisted in this project. This Consultant also wishes to recognize the Grand Valley State University Statistical Counseling Center for its assistance in developing, implementing and providing data summaries and analysis of the Staff and Parent Surveys. We look forward to presenting this Report (accompanied by an Executive Summary) to the Grand Rapids Public Schools Board of Education at a time that is appropriate and convenient to the Superintendent and the Board.

Respectfully Submitted,

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