



**A Clinical and Educational
Services Analysis
for the
Grand Rapids Public Schools:
Center-Based Programs**



EXECUTIVE PROCESS SUMMARY

The leadership of the Grand Rapids Public Schools commissioned this comprehensive review of specific areas within the domain of its special education program. A clinical and educational services analysis (CESA), which contains a proprietary methodology that triangulates information gleaned from qualitative sources, quantitative analyses, and established benchmarks with respect to school-based practices, was utilized to achieve this broad operational objective. This document addresses center-based programs and a companion document addresses District programs.

More specifically, the qualitative analyses comprised: (1) a series of interviews with related service providers, educators, paraprofessionals, and administrators; (2) a review of documents (i.e., IEPs, Functional Behavioral Assessments, and behavior plans) to ascertain the effectiveness of educational-therapeutic interventions; (3) an understanding of the methods in which special education services are delivered to students in reference to best practices, student outcomes, and Least Restrictive Environment; and (4) site visits to selected programs. Quantitative analyses included: (1) a multidimensional descriptive statistical analyses of the District's instructional, related services, and support personnel in reference to staffing configurations, workloads, service delivery models, and programmatic trends; and (2) a financial review relating to the historical and current costs associated with the provision of special education services including transportation.

Recommendations are offered throughout this document in order to promote the inter-related constructs of effectiveness and efficiencies in view of short- and long-term programmatic, organizational, and fiscal viability of the District's special education services.

GLOSSARY OF ABBREVIATIONS

IEP: Individualized Education Program

PLAAFP: Present Levels of Academic Achievement and Functional Performance (from an IEP)

STIO: Short-Term Instructional Objectives (from an IEP)

NCS: Non-Certified Staff

EI: Emotional Impairment

KISD: Kent Intermediate School District

LRE: Least Restrictive Environment

FAPE: Free Appropriate Public Education

PD: Professional Development

S-LP: Speech-Language Pathologist or speech-language pathology services

OT: Occupational Therapist or occupational therapy services

PT: Physical Therapist or physical therapy services



INTRODUCTION

As mutually agreed upon between Futures Education and the leadership of the Grand Rapids Public Schools (hereafter, referred to as the District), the purpose of this analysis was designed to describe, analyze, and provide recommendations to improve specific aspects of its special education delivery system. The particular areas under investigation included:

- 1) a review of the assessment, planning, and monitoring of students;
- 2) the efficiency and effectiveness of related services;
- 3) center programs supporting students with severe disabilities;
- 4) the programs supporting students with learning disabilities;
- 5) a general review of the program to support students with disabilities;
- 6) a review of programs for students that have been categorically identified;
- 7) a review of programs for students with social, emotional, and behavioral challenges;
- 8) utilization of paraprofessional personnel;
- 9) a review of the organizational design and operation of the Special Education Department;
- 10) transportation costs associated with special education; and
- 11) a historical, current, and projected analyses of GRPS finances pertaining to the special education services.

Although there is inherent overlap between District programs and center-based programs (e.g., students with Emotional Impairments may be addressed in either.), the content of this document addresses Findings and Recommendations with a specific emphasis on center-based programs. The report detailing District programs shall be presented as a companion document; in should be noted that the majority of information pertaining to District “culture,” workload analyses, and informational appendices may be found in that document.

With respect to the methodology, the information presented below was gleaned via a review of educational documents (i.e., Individualized Education Programs), descriptive and inferential statistical analyses, and confidential interviews with a representative number of stakeholders that allowed for a variety of clinical, educational, and administrative perspectives. The term *effectiveness* is operationally defined in a very specific manner in order to answer the question: *To what degree do the services under review promote educational outcomes and student access to the curriculum?* Efficiency, for the purpose of this discussion, refers to the seminal issue of cost-effectiveness. More specifically, the component of the analysis pertaining to efficiency attempted to answer the question: *Is the District receiving maximum productivity with respect to the services under review* in order to



assure responsible short- and long-term allocation of resources in its provision of special education services.

PRIMARY FINDINGS

- With respect to the programs serving students with more significant special education needs, it is commendable that the Ken-O'Sha programs (comprising the four programs housed within the Ken O' Sha building) allows for students with a myriad of cognitive and physical needs the opportunity to be with typical peers. From Least Restrictive Environment (LRE), best practice, and fiscal perspectives, this model serves as an exemplar and could be replicated throughout the District. The plausibility of this replication will be discussed in the *Recommendations* section of this report.
- Based upon the comments of those interviewed, it appears there are a limited number of non-certified staff (NCS) assigned to the special education programs of the District. This is a commendable practice as it should be the exception to the rule for an assistant to be working directly with one student. In any event, NCS should be assigned to a teacher or program – not to a student. Although the students with more limitations may appropriately require adult support in all school related and life skill areas, these students may not need 1:1 support for all activities all day. In point of fact, given the dwindling community resources for students when they graduate from school, the assignment of a 1:1 NCS may be counter-productive, by unintentionally producing a culture of dependency on an adult that cannot plausibly be replicated upon graduation.
- In corroboration of the previous PD discussion, it was reported that more training in the needs of certain student populations (i.e., those students with multiple disabilities and emotional needs) would be helpful to the NCS staff (as well as the overall instructional staff) to optimize their effectiveness in supporting inclusive practices and instruction.
- Based upon the student records reviewed, there were few Functional Behavioral Assessments (FBAs) or Behavioral Improvement Plans (BIPs) included. Those that were included, appeared to be referred to in developing a program. However, there did not appear to be consistent carry-over of these documents or processes to student IEPs (the reader is referred to Appendix A for a detailed description of IEPs for students with EI). Moreover, in corroboration of the theme of inconsistency across the District, there is no consistent Level System in the classrooms and many of the students do not have BIPs. When BIPs are in place, many are not completed. It is also reported that general education staff do not follow the plans even if they are given. The authors speculate that because BIPs are completed on four separate documents (comprising 2 formats from the KISD BIP form and 2 formats from the MiBLSi BIP form), there is greater margin for variability and lack of follow through.



- It was reported by staff that there is little interest or focus on transitioning out of district students back to their home schools. A staff member, who has been at the High School program for over 6 years and has only seen 1 or 2 students return to their home school. Students in these programs reportedly are required to work their way back into the general education setting. This philosophy is at complete odds with both IDEA and Michigan Office of Special Education and Early Intervention Services LRE policies.
- The lack of consistency in executing behavior plans is just one reason in the low number of transitions students from the center-based programs back to their home schools (i.e., their LRE). Chief among these are: (1) an absence of clear exit and entrance criteria; (2) local districts that overtly refuse, or covertly sabotage, the transition process back to their schools; (3) students having found their “niche” in the programs and therefore being reluctant to leave the program; (4) an absence of adequate supports in the students’ home schools (that also led in many cases to students needing these more restrictive placements); (5) an absence of a systematic data collection system that tracks length of stay; and (6) a cultural dependence on the self-contained programs throughout the District.
- The large number of nurses in the Lincoln Developmental Program is a concern. There are 48 students who are tube fed thereby purportedly requiring the large number of registered nurses.¹
- In each center-based building, there is a “Sensory Room,” which is reportedly being maintained and monitored by certified occupational therapy assistants. Although the authors caution that our site visits constitute only a “snapshot”, it is noted that during our visits staff appeared to be using these rooms more than the students. Similarly, it was reported that the swimming pool was used infrequently at the Lincoln Developmental Program.
- As shall be elaborated upon from a fiscal perspective in the forthcoming discussion on finances, replicating one of the four programs as currently housed at the Ken-O’Sha program will afford students with educational disabilities maximal opportunities to be with typical peers (which may take the traditional form of inclusion).

In addition, this model would allow for reverse mainstreaming, which is defined as having general education students in special education classrooms in order to interact with special education students. This initiative has traditionally included a “lunch bunch” program, which allows typical students to eat and socialize with disabled peers. This model could provide a beneficial opportunity for the typical students to provide social role

¹ Per the authors initial inquiries, it was revealed that within the state of Michigan tube feeding is *not* considered to be a medical procedure.



modeling in a naturalistic activity and milieu. Should leadership decide to pursue this programmatic model, then reverse mainstreaming will provide another meaningful platform to provide LRE opportunities and support the district in its performance vis-à-vis the State Performance Plan.

- One of the most significant challenges to ensuring not only inclusion opportunities for students with special needs is the increasing large classroom sizes across the District. Per report, these are approaching 38 students per class and present an increasing challenge to the general education and special education teachers alike. It was also reported that many students are assigned to a station for online learning and rarely receive instructional support from certified staff.

RECOMMENDATIONS

- The District should consider employing entry and exit criteria for paraprofessional support personnel. This process will ensure greater parity and equalization of access to services students across the District, irrespective of the school that they attend. If paraprofessional supports are deemed necessary beyond the programmatic assignment of NCS, it is recommended that objective, measurable, and explicit IEP goals specifying corresponding functional skills that will allow attenuation (if not complete discharge of the paraprofessional supports) be included as a featured component of the IEP. The authors have provided, in Appendix E of the companion document, a sample rubric that encompasses all of these parameters, and is currently being utilized by the Holyoke (Massachusetts) Public Schools.
- Opening up and expanding PD for NCS personnel focused on supporting students with educational disabilities is recommended to build capacity to develop the skills to effectively educate students with varied learning needs. One example of this training may be how to safely transfer students with multiple disabilities safely using Hoyer lifts. If behavioral interventions are particularly addressed for NCS, as well as other staff, this would allow students with EI to be educated within the general education classroom and have the added benefit of creating personnel capacity to support students returning back from the Alternate Program. The authors emphasize that this, in turn, will decrease the classroom size at the program, making it simultaneously more effective for students truly in need of being there.

Other suggestions to optimize NCS supports include: (1) developing individualized plans of support for students with emotional impairment, particularly at the high school center program that capitalize on paraprofessional assistance in the implementation; and (2) structuring the role of the paraprofessional in the center programs for students with emotional impairments in order to increase their time of student engagement.



- The uniform and consistent application of FBAs, BIPs, and behavioral programs is considered critical in order to support students with EI—whether in their home schools or separate programs: If staff are not using the same techniques, student success will be contingent upon the talents of the instructional staff and not the process. Furthermore, given the inherent transience of the student population, it is critical that the same terminology be used from school to school (and from classroom to classroom) to ensure that the student knows all staff are working from the same “play book.” Therefore, as it relates to the programs supporting students with EI, it may be helpful to:
- Develop a Level System that can be used consistently across the District. This would allow the students to have a predictable system as they move to different classes or programs. With a consistent level system, benchmarks could be established to allow students to transition back to their home school. This would allow other students to come into the program as need. It would also allow the county and district to stop adding rooms and staff.
 - Consider an individualized approach to exit from the program. Goals and objectives can be tied to student progress in meeting behavioral expectations for exit. The Level System may be used as a reinforcement/incentive program as students typically earn more privileges with movement up the levels.
 - Ensure that every student in a general education EI classroom and the KEC programs have a behavior plan that adheres to the consistent program. If the student’s behavior is severe enough to remove them from a general education program, they should have a specific, individualized plan established to meet their needs.
 - Encourage staff to provide structure and assurance of the day’s routine by posting a daily agenda. Every room should post a visual reminder of the behavior expectations or rules.
 - Review SWIS data at least monthly with building staff to determine need for changes or refreshers in behavior support.
 - It is recommended that entry and exit criteria for the SEI KEC Center Program be developed and shared. In this manner, clear expectations of students, parents, LEAs, and teachers may begin at the outset, and therefore the culture of celebration when a student is exited from these programs can begin.



- The District leadership should decide if KEC is a program for EI students or a program for severely behaviorally challenged students. At this point, it is program for all students that school districts do not want to, or are unprepared to, deal with. It leaves students that fit the State of Michigan definition for Emotionally Impaired in the same programs with students that are more conduct disordered and students that are certified as being on the autism spectrum. Although some students may cross both areas, most do not. It is therefore extremely difficult to program for these various categories without appropriate training. If leadership does decide to continue the program, it at the very least needs to reflect uniform application of its behavioral interventions.
- In order The District should consider a greater evolution to an integrated model of therapy, whereby service providers “piggy back” on other elements of the students’ IEP. For example, as it pertains to speech-language issues, if a student is working on the foundation skill of understanding the temporal distinction of *first*, *next*, and *last*, then it may be embedded as an academic goal to promote narrative productions. In this manner, the skills traditionally understood as the responsibility of SLPs, are inherently transferrable to a goal that is both more educational and more apt to have grade-level alignment. In a similar vein, a PT who feels s/he shares ownership of all goals and objectives with all personnel may be prompted to embed directionality during treatment, thus further reinforcing these authentic teachable moments.

A fully operational integrated therapy model, in effect its own version of a co-taught model, will ensure that all IEP stakeholders “own” the goals and objectives, thereby further ensuring educational outcomes and the cross-validation of progress monitoring (i.e., multiple service providers and educators will be required to all provide input during marking periods) while simultaneously optimizing the District’s finite related services personnel resources.

- With a simultaneous reduction of NCS positions by 10% (to levels suggested by State regulations except in cases of documented health and safety concerns) and the elimination of the tiered pay schedule, savings could approximate over \$1 million annually.
- Consider a more in-depth analysis of the center-based costs. Operating all of the programs in Kent County allows recoupment of the District’s costs. However, the high number of supervisors and principals (19 staff members at a cost of \$4,338,412) may be impacting maximization of that cost recoupment.
- Relocate at least four classrooms from the Lincoln Developmental Programs, serving students who do not need either nursing services nor have behavioral issues, to age



appropriate general education schools within the District (i.e., models that mirror Ken-O'Sha program). This would enable the District and county to look at bringing all classrooms to close one building while optimizing LRE opportunities for the students with IEPs that will have moved to the general education programs.

- Once a working exit criterion is established, it could allow for the closing of one of the 3 KEC schools. This would allow for one principal over the building rather than splitting one principal over two schools. There are schools within the District that could accommodate larger programs and be set up to separate supporting lower elementary, upper elementary, and middle and high school programs. The savings would be the cost of operating a building and the custodial staff. In addition, Title One funding may be pursued for the remaining center-based program.
- Explore the “value added” with work flow analysis of some of the ancillary staff at programs (e.g., the Security Guard at the KEC high school program).