

**Including Students with Disabilities in the Acceleration Agenda:
Promoting Successful Pathways to Postsecondary Education and Employment**

February 24, 2010

**A Statement to:
Dr. Johnson and Members of the Boston School Committee**

**From:
Boston Parent Organizing Network
SPED PAC Transition Subcommittee
Boston Center for Independent Living
Center for Law and Education**

We are a group of parents and advocates of students with disabilities in Boston, who have come together to call on BPS to make good on its promises to address the problems associated with the delivery of special education to eligible students in Boston. This letter is a follow up to earlier comments submitted in September 2009 by parents of the Boston Parent Organizing Network (BPON) and parents of the Special Education Parent Advisory Council (SPED PAC) in response to the evaluation of special education conducted by the Council of the Great City Schools (CGCS).

As BPS moves forward with the Superintendent's Acceleration Agenda and strives to develop in all students **“the knowledge, skill, and confidence to excel in [postsecondary education], career, and life,”** it is critical that students with disabilities are not left behind. Years of research have demonstrated that youth achieve better post-school outcomes when the transition from high school to postsecondary education, career, and adult living is grounded in high-quality learning experiences. **We seek a commitment from BPS to focus on improving systemically the quality of education provided to middle and high school students with disabilities. Only through such improvement can students possess the knowledge and skills necessary to transition successfully to postsecondary education and employment.** We are also asking BPS to create a special education taskforce and to commit to greater transparency by involving parents and advocates in meaningful ways in decisions that have an impact on students receiving special education. We request a follow up meeting with Dr. Johnson and appropriate staff to discuss these matters further.

In making sure that middle and high school students with disabilities are included in the Acceleration Agenda, we urge BPS to focus on the following seven areas: (1) more effective inclusion options; (2) high-quality academic opportunities for all students receiving special education that ensure meaningful participation in the general education curriculum; (3) improved vocational opportunities, including options in the community that prepare students for integrated employment; (4) better transition planning procedures that promote a student-centered approach as well as improved connections with adult agencies; (5) implementation of a range of effective

instructional programming and strategies to address challenging behavior; (6) greater collaboration with parents and students, as appropriate, in developing and implementing the IEP; and (7) reassessment of the role and function of the ETFs and ETF clerks.

(1) More Effective Inclusion Options for Middle and High School Students

Although BPS has some positive examples of inclusion for students in the younger grades, when students age out of schools such as the Henderson, there are no good inclusion models for middle and high school students. The CGCS report highlighted the fact that placements in Boston become more restrictive in the later grades. We are aware that some high schools have multiple substantially separate classes for students with disabilities. To make matters worse, these classes are often isolated from the rest of the school. In a number of buildings, the substantially separate classrooms are located on the ground floor or basement because some of the students have mobility challenges and the buildings are only accessible from these floors. However, these students have few opportunities to interact with other students or to become integrated into the broader school community. These students are also commonly denied access to core school resources such as libraries and computer labs.

Moreover, BPS continues to operate within the “categorical” placement system that is driven by a “one-size-fits-all” model (e.g., L4 classes for students with learning disabilities and B4 classes for students with behavioral disabilities). Rather than creating varied models of inclusion at each school to address the individualized needs of students, BPS forces students to fit into predetermined categories based on a so-called primary disability and to the detriment of their other disability related needs. For example, many children with behavioral challenges are placed in classes based on their behavior, despite the fact that they also have specific learning disabilities. Although the Individuals with Disabilities Education Act (IDEA) states that special education is a “service” that students receive, and not a “place” where students are sent, BPS continues to focus on special education as a place and diagnoses as a determinant of needs. Because of the lack of appropriate inclusion options for older students, some parents expend significant resources requesting an out-of-district public placement or a private placement in order to make sure that their child’s needs are appropriately addressed and met. BPS could save money on transportation and out-of-district tuition costs through the creation of more effective educational programs within the district.

Recommendations

- Develop an immediate plan to eliminate the “categorical” placement system for special education and move instead to a more flexible model of inclusion that allows schools to address the individualized needs of students.
- Hold principals accountable for taking responsibility for effectively educating and integrating students with disabilities as full members of their school community rather than allowing principals to delegate this leadership and responsibility to administrative staff.

- Make sure that all schools are able to educate the majority of students with disabilities and, on a case by case basis, students with low incidence disabilities; students should be educated in the school they would attend if they did not have a disability.
- Provide more effective professional development for teachers and staff (including principals); create joint training opportunities for special and general education teachers.

(2) High-Quality Academic Opportunities for All Students Receiving Special Education that Ensure Meaningful Participation in the General Education Curriculum

Providing students with disabilities with a high-quality academic program is a critical part of the process to make sure that they are prepared for life after high school, including postsecondary education (such as community college) or employment. Students with disabilities have the right to be taught to the same high standards as students without disabilities. We are concerned that BPS does not share a vision of high expectations for all students with disabilities. Lack of such a shared vision directly contributes to low expectations for our children. Rather than providing students with opportunities to access higher level content and to participate in meaningful ways in the general education curriculum, students with disabilities are often given a watered down, low level curriculum. We have found that some special education classes are too easy and do not challenge students sufficiently. Even when students receive high grades in these classes, they are not always being held to high standards. For students with developmental disabilities, we are concerned that our children are not being taught academics aligned with state and district standards in the older grades and, as a result, they do not continue to learn knowledge and skills expected and, instead, lose skills or regress. We want to make sure that our children learn how to read, write, and do math so that they can be prepared for life after school. Moreover, BPS must make sure that, in addition to focusing on literacy in the younger grades, sufficient attention is paid to address adolescent reading and math literacy. It is especially important for older students to be able, not only to decode, but also to access higher level content.

Recommendations

- Hold schools accountable for providing a high-quality education to students with disabilities that is consistent with the MA curriculum frameworks; make sure that effective teaching and learning aligned to state and district standards is taking place in **all** settings, including general education classes and substantially separate classes.
- Promote greater use of technology to help teachers address the diverse learning needs of students and to help students access information and higher order skills.
- Provide professional development to teachers and staff (including principals) in areas such as universal design for learning, differentiated instruction, and assistive technology.

(3) Improved Vocational Opportunities for Students with Disabilities, Including Options in the Community that Prepare Students for Integrated Employment

Research has highlighted the importance of engaging students with disabilities in their communities by providing them with community-based, vocational experiences. The goal should be to move away from the sheltered workshop model of the past that places youth in artificial work experiences in a segregated environment that resembles a factory assembly line. Instead, BPS should promote community-based, vocational options that help prepare students for integrated employment opportunities in the future. Integrated employment allows individuals with disabilities to earn competitive wages in an environment in which they interact with individuals without disabilities.

We have seen that for BPS students who take the MCAS alternate assessment based on alternate achievement standards in the tenth grade and are expected to continue to receive educational services until they turn 22, there is a common “path to nowhere.” Rather than using these extra years to continue to prepare students to learn academic content knowledge and skills, including those necessary for successful employment and postsecondary education, BPS treats this time as a holding period. In our experience, although a small number of schools make vocational goals a central theme of the IEP and school life, most schools narrowly define vocational education and instruction as “training” and attempt to pass the duty of providing this training on to other agencies. Their rationale in passing the buck is that the schools do not have the time, expertise, or resources, and that vocational training is not their responsibility. Schools that do provide work-based experiences tend to offer one or two experiences to all of the students in the program, with no effort made to individualize or to incorporate standards-based learning into the vocational experience.

In addition, there are few vocational options available to students with disabilities outside of school beyond recycling (sorting white and colored paper) and limited janitorial work (cleaning bathrooms). Students with disabilities have limited opportunities to participate in programs at the Madison Park Technical Vocational High School. Sometimes students are sent to Work, Inc., but this is a sheltered workshop model that serves adults with disabilities and does not prepare students for integrated employment. Although Work, Inc. has recently changed buildings, the program remains the same. A typical “vocational” experience at Work, Inc. is placing nails in a box.

The main unit in BPS that provides pre-vocational and vocational support to students with disabilities is STRIVE. STRIVE is supposed to help students achieve personal goals; however, the focus of STRIVE is narrow and staff from STRIVE rarely attend IEP meetings. The STRIVE website lists only recycling and facilities management as possible pre-vocational and vocational options for students:

- CitiCycle I at Brighton High School
- CitiCycle II at Wentworth Institute of Technology
- Facilities Management at Wentworth Institute of Technology
- Municipal Recycling

As parents, we are outraged that BPS assumes that the only type of work our sons and daughters are capable of accomplishing is recycling, limited janitorial work, and the sheltered workshop experiences at Work, Inc. Contrary to what we are told by BPS staff, recycling and janitorial work do not provide students with pre-vocational skills. We know that other school districts allow students who are going through the transition process to participate in employment opportunities in the community, and we feel that our children are being denied such opportunities simply because we live in Boston. Some of us have fought to get our children into a private school or a school in another district because of the limited vocational opportunities that are available to students in Boston. It is time for BPS to have high expectations for our children and what they can accomplish and to start viewing the years from 10th grade to age 22 as a time to reach additional milestones.

Recommendations

- Make it a priority to focus on improving pathways to successful employment and postsecondary education for students with disabilities.
- Require schools to develop measurable benchmarks to assess students' progress with respect to vocational goals; provide parents with information on student progress.
- Re-assess and overhaul the STRIVE program.
- Move away from sheltered workshop models such as Work, Inc. and from other low-level programs that offer limited and narrowly defined re-cycling and janitorial work that are not designed to assist students in developing higher level skills.
- Build the capacity of BPS to understand and promote community-based, vocational opportunities for students with disabilities.
- Create more community partnerships and opportunities for students to experience vocational opportunities in the community; promote integration at all levels.
- Examine best practice community-based, vocational models from other school districts.

(4) Better Transition Planning Procedures that Promote a Student-Centered Approach as well as Improved Connections with Adult Agencies

The CGCS report and the 2009 Coordinated Program Review conducted by the MA Department of Elementary and Secondary Education found no violation with respect to transition planning and services. We know, however, from our experiences that BPS is not doing an effective job with transition, and our children are suffering as a result. The reason that BPS received a score of 100% compliance for transition is that Massachusetts has determined that the indicator for compliance is whether the transition planning **form** is included in a sample of IEP files. However, no attention is paid to the quality of the information entered into the form or to the kind of transition services that are actually provided. As parents, we are not always given a

copy of the transition form even if it is included in our child's file. We also know that BPS rarely uses transition assessments to help shape transition goals.

Although research has shown the importance of providing student-centered transition planning as well as the need to develop self-determination skills in students with disabilities, students in Boston are rarely involved in the transition planning process. This makes no sense because it is impossible for an IEP team to develop a plan for helping a student become a successful adult without involving that student and his or her preferences in the process. It is also important for the transition planning process to be focused on an individualized vision for the student's future. For example, if the vision for the student includes attending postsecondary education, the IEP must lay out the goals and services that will enable the student to get there. If the student requires the acquisition of life skills, the IEP must include appropriate goals and services to address this particular need.

Further, there are limited connections between BPS and the adult service agencies. BPS is supposed to invite to an IEP meeting involving transition planning a representative of any agency that is likely to be responsible for providing or paying for transition services. This rarely happens. In addition, although BPS personnel are often willing to make a "688 referral," little is done to follow up with the identified adult agency. In Massachusetts, a 688 referral is made when the school district determines (with the consent of the student and/or the student's parent or guardian) that the student may be eligible to receive services from an adult human service agency such as the Department of Developmental Services or the Massachusetts Rehabilitation Commission. The 688 referral must be made at least two years before the student turns 22 or at least two years before the student's graduation from high school (whichever comes first). The transition from receiving special education services to being served by an adult service agency is a major turning point in the lives of youth with disabilities. We want to make sure that BPS is doing what it can to help our families deal with this process and all the changes that take place.

Recommendations

- Involve students to a greater extent in the transition planning process in order for them to develop self-determination skills and to have the opportunity to tell the team what their interests are and the options they would like to explore.
- Promote collaboration with adult service agencies.
- Provide more training and professional development for staff on effective transition planning, including the use of transition assessments.
- Assume that life-long learning is a goal for **all** students, including those with disabilities.

(5) Implementation of a Range of Effective Instructional Programming and Strategies to Address Challenging Behavior

The CGCS report stated that BPS has a high percentage of students identified as having an emotional impairment. The report also highlighted the inadequate training/professional

development in the area of appropriate behavioral interventions. Teachers and staff need support and training to help them deal with what happens in the classroom. We also want BPS to eliminate the L/AB Clusters. These are separate, inferior classroom settings with low-level instruction for students labeled as having an emotional impairment or behavior disability. The students in these classes are predominantly African American males. Although BPS has a responsibility to promote positive behavior and to address inappropriate behavior that adversely affects the school community, the current approach is not educationally effective and denies equal educational opportunity to learn to high standards to students with behavioral needs. Students with behavior disabilities must be given the same opportunity to meet the state's academic standards as other students. Sometimes students are labeled as having a behavior disability after they become frustrated in class because they have learning challenges that were not addressed, particularly in reading and math.

Recommendations

- Eliminate the L/AB Clusters.
- Make sure that students with behavior disabilities are educated in classes in which they are provided appropriate behavioral interventions, as needed, and effective instructional support and assistance to enable them to learn what all other students are expected to know and be able to do based on the MA curriculum frameworks.
- Provide professional development for staff to help them work with students to address behavioral challenges more effectively; make sure that students are not punished for their disability.

(6) Greater Collaboration with Parents and Students, as Appropriate, in Developing and Implementing the IEP

Parents were told last year that BPS was in the process of moving forward with the adoption of a new IEP form. BPON parents submitted comments on this new form but did not receive any response. We are still waiting to see when BPS will roll out the new IEP and whether parents will receive any training. Some of our concerns include the fact that there is little room in the current IEP to fill out information. We hope that the new form will have unlimited space. In addition, we are concerned that the translation process takes a very long time. Because BPS sends the IEP to a central location for translations, parents do not receive the translated copy until much later. Also, the translation is often of a poor quality, sometimes half in English and half in another language. Our biggest concerns with the IEP pertain to the fact that schools do not develop high-quality, individualized IEPs and schools do not implement IEPs. We also want to make sure that the contributions of parents and students, as appropriate, are taken seriously at IEP meetings.

Recommendations

- Follow through with the adoption of the new IEP form and provide training for parents and staff on how to use it.

- Improve the process for translating IEPs.
- Hold schools and school personnel accountable for implementing IEPs.
- Provide training for staff on the development of effective IEPs, including the drafting of high-quality, standards-based IEP goals that are connected to the general education curriculum.

(7) Reassessment of the Role and Function of the ETFs and ETF Clerks

We would like BPS to reassess the role and function of the Evaluation Team Facilitators (ETFs) and the ETF clerks. We are unclear of the exact role and function of these two positions. In particular, the ETF clerk is a position that remains from the days before IEPs were computerized. Many large urban school districts focus an inordinate amount of time and resources on procedural compliance, rather than emphasizing high expectations and high-quality curriculum and instruction for students with disabilities. We want BPS to redefine the role of the ETF in a manner that moves beyond procedural compliance to focus instead on ensuring that our children receive a high-quality education. We also feel that the individuals who are in these two positions do not always interact respectfully with parents. Often the ETF or the ETF clerk is the school contact person for parents of students with disabilities; however, these individuals do not always act in ways that support students and parents. Parents are the experts concerning their own child and should be treated with respect at all times, including at IEP meetings. We are also concerned that BPS spends a large amount on the salaries of ETFs and ETF clerks. Some of this money might be better spent on programming for students with disabilities. We think that it is particularly important for BPS to review the role and function of the ETFs and the ETF clerks in light of some of the proposed budget cuts.

Recommendations

- Reassess the role and function of the ETFs and ETF clerks in the context of the budget and union contract negotiations; make sure that these individuals are not focusing exclusively on procedural compliance but, rather, promote a shared vision for a high-quality education for students with disabilities.
- Involve parents in the development and implementation of training for ETFs in how to work more respectfully and more collaboratively with parents.