Systemic Improvement to Increase Performance of Students with Disabilities

Recommendations for Washoe County School District

Prepared by WestEd — Center for Prevention and Early Intervention

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Table of Contents

Overview

Foundation for this Project

In the spring of 2015, Washoe County School District (WCSD) leadership reached out to WestEd for assistance in analyzing the systemic conditions responsible for current achievement of special educations students in the district. District leadership voiced concerns about performance results for students, as well as compliance results evident in the system. With regard to student results, data analyses had been conducted by personnel within the District, as well as with external partners such as the Regional Education Laboratory West (REL West) and others, to reveal under-performance in test scores, graduation rates, and other indicators of success. In terms of compliance, findings from a number of State Complaints filed over the past several years revealed issues with the District's system of general supervision relative to ensuring that federal and state requirements are being met as specified in the Individuals with Disabilities Education Act (IDEA) and the Nevada Administrative Code (NAC).

WestEd's Center for Prevention and Early Intervention was asked to analyze the District's system of supports for children with disabilities to ***assess ways in which the system could be improved, so as to improve results for special education students***. WestEd was not asked to analyze student performance data as part of this project, in as much as such analyses had already been conducted and formed the basis for this contract, however discussion did occur with regard to student outcomes during the course of interviews and focus groups conducted through this project. WestEd did review all compliance findings in order to understand the District's current policies and procedures for general supervision.

A foundational component with regard to this undertaking is to understand that the performance of students with disabilities is affected and influenced by the work of every individual and department who has a relationship to the education of special education students within the District as a whole. Accordingly, this project was not, nor should it have been, singly an assessment of the Student Support Services division. Instead, this project was designed to, and WestEd did undertake, an analysis of a myriad of district-wide conditions that contribute to, or hinder, special education student success.

About WestEd

WestEd is a nonpartisan, nonprofit research, development, and service agency that works with education and other communities throughout the United States and abroad to promote excellence, achieve equity, and improve learning for children, youth, and adults. WestEd is headquartered in San Francisco, CA, and operates 11 Programs, or

divisions, including the Center for Prevention and Early Intervention (CPEI) – who undertook this project. CPEI has directed numerous research and program evaluation projects with regard to systemic change endeavors, by providing analyses, training, and technical assistance to individual and collective organizations.

CPEI's work focuses on the implementation of the Individuals with Disabilities Education Act for both Part B and C, including legal mandates as well as evidence-based practices for generating desired child outcomes. Specific activities that address the needs of children with disabilities and those at risk for additional services and supports include the development of statewide evaluation of programs and systems, workforce development training and technical assistance for professionals supporting positive special education outcomes; addressing the issue of highly qualified personnel through the development of resource tools and supports; creating alternative assessments linked to state content standards; resource development to support the inclusion of students with disabilities in the general education classroom and communities; addressing the needs of families and maximizing family engagement; and professional learning to grow a deep understanding of the complexity of multiple systems and expertise in identifying systemic solutions for states as well as local districts and counties.

Purpose of this Report

As described above, WestEd was contracted to address two overarching areas of concern: (1) conditions affecting special education student performance; and (2) issues of compliance with state and federal regulations. This report provides recommendations for improving systems within Washoe County School District to achieve both of these ends, and describes the associated rationale for each recommendation. In order to meet the project goals, WestEd staff developed, compiled, and analyzed teacher and administrator survey results, reviewed a broad range of district-related documents, and engaged in interviews and focus groups with district staff and stakeholders across all levels of the system, to determine trends that resulted in the recommendations presented on the following pages.

Status of Systems Change Implementation

It is important to note that during the period in which this project has been operationalized (started May 2015), some changes have already been designed and are already underway. Superintendent Davis brings a strong vision for inclusion, equity, and excellence for all students. From senior level leaders, commitment is acknowledged, and changes in administrative position locations, staff assignments, and other indicators of change are embraced and appreciated by personnel at the most senior levels of leadership. (Data were not collected from site personnel subsequent to these changes therefore this report must remain silent about said endorsement.) There is particular early enthusiasm for the concept of student support personnel to be housed within school sites, and yet is to some degree that is balanced with a bit of a "we'll wait and see" attitude. A key consideration is: how will changes be communicated to the site level and then the implementation of changes supported? Deep systemic work across all levels of the system is just starting. Communication and awareness has begun at the senior level and now needs to be deployed at each level of the system.

Focus Area #1: Culture and Climate

Create and sustain an inclusive culture of high expectations for all students, recognizing that students with disabilities are part of the larger educational system and that there shouldn't be a separate vision for, or single department who bears responsibility for, their success.

Focus Area #2: Compliance

Develop and implement a comprehensive compliance system as a mechanism to drive and monitor system performance pursuant to district, state, and federal requirements.

Focus Area #3: Communication

Develop, enhance, and refine the district's systems of communication so that all relevant stakeholders: receive timely, accurate information to increase their knowledge, skill, and efficiency in supporting students; are better prepared to engage in iterative opportunities to inform and influence the system; and experience conditions that lead to implementation of the district's vision.

Focus Area #4: Human Capital

Align professional development activities and collaborative support between Human Resources, Student Support Services, and other programs to promote high expectations and ownership of all students by all staff.

Focus Area #5: Data Systems

Unify data systems in order to share accurate, timely, and actionable information across various departments and develop agreements regarding how to legally and effectively use information for a variety of purposes.

#6 – Stretch Goal: Resource Allocation

Refine decision-making processes and practices so that resource allocation is systemically driven by student performance parameters, with compliance as one criteria but not the only or primary criteria.

Focus Area #1: Culture and Climate

Recommendation

Create and sustain an inclusive culture of high expectations for all students, recognizing that students with disabilities are part of the larger educational system and that there shouldn't be a separate vision for, or single department who bears responsibility for, their success.

Rationale

When asked to describe the District's vision for students with disabilities, interviews and focus group participants struggled with their responses. Many people could cite the language *"Every child, by name and face, to graduation"* but didn't, or couldn't, make connections to the relationship of special education students to this district-wide vision. There seems to be a pervasive attitude that the Student Support Services Department doesn't have a vision for special education students, and that any such vision for the performance of students with disabilities should rightly be developed and led by that Department.

A majority of students with disabilities spend 80% or more of their school day in regular education classrooms. Nationally there is an explicit understanding by successful educators, that in order for students to succeed, all teachers involved with a given student need to feel responsible for, and committed to, ensuring that child's success…they each need to equally "own" the student's outcomes. When raised to the district systems level, the same is true. All Departments need to "own" the success of the district's special education students. It cannot be the role of one Department to ensure success for the district's students with disabilities. These children are first and foremost, members of the larger general educational system that is "The District". Special education services should by design be supplemental to the teaching and learning conditions of the general education system. Accordingly, a separate vision for such students is counter-intuitive to the district's overarching goal…to see *every* child to graduation. The current system of decentralization, with communication channels that flow from the central office and area superintendents, then to the schools within their zones, can lead to misunderstandings and differential expectations about vision, priorities, and implementation efforts.

Related Considerations

In practice, when personnel speak to the vision of *Every child, by name and face, to graduation*, it comes across as more of a slogan than a conceptual vision. Attention will need to be paid to helping individuals make the vision real, concrete, and tangible. There are widespread challenges with regard to perceptions of competence by the Student Support Services Department, and associated perspectives of disrespect and/or disregard for various staff members. Designated leaders within the District Office and various Departments will need to champion the vision as implicitly connected to students with disabilities and help draw tangible lines to assist staff in understanding what this vision means with regard to planning for, providing, and measuring the

success of educational endeavors for special education students. In other words, how is the vision operationalized in daily practice, at the classroom, school, and district level? Attention should be paid to the number of initiatives that are being undertaken at any given time, and the explicit connections of each initiative toward the success of the district vision. Individuals seem overwhelmed by the volume of various initiatives and don't perceive some initiatives as aligned towards overarching goals. As a result, they may individually pick and choose what to prioritize, leading to fragmentation and concerns about implementation fidelity.

Collaboration seems to be built on personal relationships…the system doesn't expect, monitor, or incentivize collaboration among and across departments, which has implications for building a district-wide culture and climate of trust and shared values. Additionally, strong attention both internally and in the media on the perceived failures of the district, and specifically of special education administrators and teachers, which have stemmed from compliance reports in the recent past, have created a condition of fear, due in part to a lack of understanding about the roles and responsibilities of various individuals, accompanying expectations, and potential looming consequences (real or imagined). This lack of clarity about job roles and responsibilities has contributed to a culture of distrust, confusion, and frustration.

Challenges
Establishing expectations that are grounded in strongly stated values, and modeled across the district, both internally and externally, will be challenging for the district. Building trust is a clear and powerful underlying charge associated with creating a district-wide culture of collaboration. At various levels within the organization as well as outside of it, there are perceptions about the competence of special education personnel that may create challenges as the district seeks to affirm existence of, and where necessary grow, essential skills, knowledge, and dispositions for staff to succeed in their assignments. These challenges are exacerbated by issues of turf and territoriality that have been built up as a result of perhaps unclear understandings or misinterpretations of policies and procedures, such that in the absence of clear understanding, individuals have created their own operational solutions to a problem. In some cases these solutions have worked, but the result is inconsistent implementation approaches in the organization. It will also take effort to reduce the isolation that currently exists between general education and special education collaboration models in the district so that cross-collaboration becomes the norm. The size of the district creates a challenge in making sure communication reaches all stakeholders, therefore reducing confusion and isolation. Established routines will help to address these communication challenges, and towards that end, implementing the other recommendations in this report will be instrumental in achieving an inclusive vision for the district.

Opportunities and Supporting Conditions
Accountability models and public pressure from within and the outside the organization, as well as educators' and family members' strongly committed interests and dedication to children's well-being, create conditions of motivation to improve the systems of support for special education students in the district. The School Board and newly appointed School Superintendent Davis have publicly prioritized the importance of special education student success. The interest and attention of necessary leaders is

already in place, which begets the opportunity to move to implementation and continuous improvement, based on a shared understanding of issues, challenges, and needs.

Focus Area #2: Compliance

Recommendation

Develop and implement a comprehensive compliance system as a mechanism to drive and monitor system performance pursuant to district, state, and federal requirements.

Rationale

Resolving compliance-related issues is important, and failure to do so results in the Student Support Services Department (SSS Department) having to divert fiscal and human resources toward remediating lapses, rather than improving outcomes. Although interview and focus group participants expressed some satisfaction with the responsiveness from the SSS Department in conditions of compliance concerns, they also noted that inconsistent interpretation and application of regulatory and compliance information varies from within the SSS Department.

There are several mechanisms in place to assist with monitoring compliance at school sites and IEP implementation. As a result of a state-mandated corrective action, the SSS Department developed an IEP Implementation Checklist and reviewed a random sampling of student IEP files at every school site; and now the district has hired personnel to assist with the process. It is difficult to determine how the findings were communicated with site teams. During the past two academic school years, seven state complaints were filed with the Nevada Department of Education (NDE). One theme that emerges from complaint findings in the NDE reports is a lack of understanding regarding the IEP requirements in terms of compliant instructional strategies.

State Complaint Reports issued by NDE indicate "training" as a consistent recommendation for implementing compliant IEPs. One corrective action stated "The WCSD shall train all personnel in the WCSD involved in implementing IEPs, including any administrators responsible for supervising the implementation of IEPs, to ensure that they are trained in and understand the requirements to implement IEPs specifically: the requirement to provide designated services with the frequency and locations required and in accordance with the percentage of time in the regular education environment as set forth the IEPs." Another Report directed the district to "Provide training or instruction to all persons collecting or using personally identifiable information within the WCSD regarding the policies and procedures for protecting personally identifiable information, including but not limited to the requirement to inform parents that personally identifiable information collected and used regarding the provision of educational services to students is going to be destroyed…"

Interview and survey participants shared that a lack of current written guidelines contributes to inconsistent practices across schools, creating the need for a single comprehensive standard operating procedures manual that is user-friendly, provides

clear information, and promotes a single message. There is a consistent and ongoing turnover of qualified personnel teaching students with special needs, which has implications for ensuring an understanding of compliance mandates. For the past 10 years, Washoe County School District reported to the Nevada Department of Education a consistent personnel shortage in the areas of special education teachers and various related service personnel. During the past academic school year, the district's internal transfer process has changed allowing special education teachers to transfer out of special education assignments to other positions, impacting the need for qualified special education teachers. A procedures manual would help facilitate an integrated approach to program planning, embedded in procedural compliant policies and instructional best practices. In the absence of such a document, Student Support Services personnel sometimes provide inconsistent information, resulting in site personnel feeling disconnected, and without clear guidelines. The Compliance team should provide monthly reports that include specific recommendations for meeting compliance standards by focusing on priorities and limiting misunderstandings throughout the WCSD.

Related Considerations
There is a lack of understanding of compliance as an integral element of high quality programming or as a focus aligned with student performance. Compliance is viewed as a "check the box" type of isolated activity, which results in impeded ability of personnel to think systemically about making connections between compliance and educational benefits that are designed to result in positive student outcomes. There is a lack of understanding on how the conversation in an Individualized Education Program (IEP) meeting could lead to quality educational programming. Without an integrated approach between compliance and high quality programming, instructional efforts and resource allocations will remain fragmented and disconnected from general education processes and whole system supports.

Individuals need to know the expectations they are charged with meeting, such explaining what it means to maintain a compliant IEP, with identified criteria. Case managers know they are to "Case Manage" but many are unclear on the specific skills and behaviors that support that case management role. While many will name ongoing parent communication as necessary, they lack the specificity by which to effectively measure their success in engaging families. Providing criteria and goals, utilizing a systematic approach for monitoring progress regarding the goals, and demonstrating how goals can be measured, can facilitate the alignment of compliance procedures and instructional practices. Building a system on continuous improvement includes answering the following questions: Does staff know what is expected of them? How do they know? Do they do it? How do supervisors and support systems know? Examining the current systems in place, such as existing monthly meetings and the Compliance Newsletter can aide in this effort.

Challenges
The lack of personnel in the Compliance Office influences the district's ability to serve stakeholders and disseminate consistent information to school sites. Because of limited personnel and time, there is inconsistency among SSS Department personnel with regard to an understanding of established complaint practices and procedures, and in some cases, there may be a lack of established protocols or procedures. The

compliance officer has already begun to write guidelines in a manual, in collaboration with an advisory team comprised of various personnel who support schools. It is imperative that a pilot process (with realistic timelines) be developed in order to collect feedback from school sites. Currently there is one staff member in the Student Support Service Compliance Office; because of personnel time constraints, a pilot phase may be overlooked and yet should be strongly considered. Finally, because there are many compliance issues and tasks initially to address, it may be difficult to prioritize the tasks, resulting in a lack of focused efforts and resources.

Opportunities and Supporting Conditions
Designing a comprehensive compliance system increases professional effectiveness by clearly defining the purpose and job responsibilities of the compliance personnel. With the recent administrative position of Compliance Officer added to the Department, the officer's primary role might best provide support by assisting principals and school-based staff in maintaining compliance with federal and state mandates, providing clear written procedures, and assisting with the design of professional learning programs required to deliver compliant high quality special education services. This personnel configuration creates an opportunity to build capacity among district and site-level personnel, to consider a team approach for the monitoring and reviewing of district-wide compliance data, and to assist schools in monitoring data.

Integrating compliance data into educational decision-making at various levels of the system can also empower the district to make informed, proactive decisions in terms of specific compliance training needs resulting in differentiated professional learning for school sites. Further, the Compliance Office has an established IEP Implementation Checklist. The checklist can be a model for developing the compliance criteria and goals expected at each site. A comprehensive, compliant system would support the current compliance initiative in the dissemination of a standard operating procedures manual and could serve as a mechanism to detail how WCSD carries out the various activities required by relevant federal and state laws. Implementing a pilot phase for the manual would encourage a shared approach among stakeholders and make processes more transparent to staff and families. Reviewing the manual prior to dissemination could also facilitate collaborative efforts among special education administrators, enhancing the consistency of guidance provided to schools, and practices implemented at schools.

Focus Area #3: Communication

Recommendation

Develop, enhance, and refine the district's systems of communication so that all relevant stakeholders: receive timely, accurate information to increase their knowledge, skill, and efficiency in supporting students; are better prepared to engage in iterative opportunities to inform and influence the system; and experience conditions that lead to implementation of the district's vision.

Rationale

Many stakeholders expressed confusion as to whom to contact for support or assistance to address a need. Interviews with various stakeholders indicate that a lack of trust and respect exists across the district in part due to lack of clear systems for both one-way and two-way communication and collaboration. Many felt the current roles of special education area administrators have competing and potentially conflicting priorities and responsibilities. As a result, a sense of insufficient attention to any one priority at any given time is created. In its current configuration, important information stemming from or about Student Support Services can feel isolated or unduly separated from communication from other district priorities and policies affecting teaching and learning for all students. Communication efforts must be proactive rather than reactive, so that relevant individuals – within or external to the organization, as appropriate – know *what* is happening, *when* it is happening, and *how* it will happen before change occurs. A lack of systemic communication systems results in staff feeling decisions are made in a top down manner without regard to ways in which those decisions will affect them. Additionally, staff may possess relevant and necessary information that would positively impact decisions that are made seemingly in isolation.

Related Considerations

More intentional and strategic communication is necessary between special and general education personnel to support the integration of special education services in students' educational programming. Sites need readily accessible information to proactively and reactively problem-solve, including who to contact for information, under what conditions, and the mechanisms for engaging such information channels at any given time. In absence of such systematized processes, inaccurate and varied information is provided to individuals across the organization, which leads to frustration, confusion, and a lack of trust in the capacity of various system leaders. Such fragmentation breeds discontent and subsequently inconsistent implementation of the district's overarching vision. Further, transition junctures in students' lives require diligent communication across more stakeholders to ensure seamless processes.

Challenges

Creating the time to prioritize proactive communications can be daunting, especially as systems are getting started and habits formed. Furthermore, determining priorities and urgency for what to share with whom, when, and how increases the challenge. Stronger relationships by SSS Department personnel, with Area Superintendents and the district's Communication Team could help to offset these challenges. Embedding special education supports within the general education system requires such

communication, and a collaborative approach by district personnel in supporting school sites, rather than a separate approach, which is currently the case at many levels of the system. Teaming becomes an essential consideration, which will be a challenging change in the way the district currently operates. Such innovations will require personnel to embrace change and develop a model in which shared knowledge is valued. Many staff members operate from a "knowledge is power" perspective that potentially leads to conditions of resentment, resistance and adverse outcomes for students.

Opportunities and Supporting Conditions
Some district special education personnel interviewed indicated interest in reorganizing roles and responsibilities to support enhanced communication and collaboration at all levels. Additionally, existing systems can be expanded and/or enhanced. For example, the recent development of the Compliance Officer's newsletter is a mechanism that capitalizes the use of an existing communication system and may eventually reach a larger audience. Another solution recently identified is the "Bright IDEA" communication that will highlight special education student and system successes. New or refined efforts such as integrated newsletters that provide systemic communication across the district, including general education and special education information can increase the effectiveness of such communication efforts. The Communication department has expertise to assist with strategic efforts. The weekly message from the Superintendent could help set the tone and model an inclusive vision from the top. The SSS Department's new site-specific assignments and site-based office locations will create opportunities to build relationships, and seek out stakeholder input regarding what individuals want to know and the most efficient method to access the information, and should be maximized.

Focus Area #4: Human Capital

Recommendation

Align professional development activities and collaborative support between Human Resources, Student Support Services, and other programs to promote high expectations and ownership of all students by all staff.

Rationale

The district vision, *Every child, by name and face, to graduation* cannot be realized for every child without a comprehensive professional development plan and deep collaboration between Student Support Services, Human Resources, and other departments/programs charged with enhancing human capital. All stakeholders must have the information they need in order to provide high quality instruction to diverse learners that includes both compliance and inclusive, current, evidence-based practices. In order for all students to achieve college, career, and civic life readiness by the time they leave the school system, all levels of that system must be coherent. Research shows that teacher-student relationships and teacher competency are mitigating factors in positive or negative outcomes for students. Recruiting and retaining the most qualified teachers takes focused efforts between Human Resources and Student Support Services. An additional consideration includes the district culture and climate and its impact on teachers' ability to effectively support students.

There is a high degree of agreement from respondents concerning the lack of knowledge and ability of staff regarding ways in which to support the diverse needs of learners with disabilities as well as all learners who struggle. There is also agreement that there is lack of training for general education staff regarding special education service development and implementation, and that there has been little mention of accommodations, modifications or ways to support diverse learners during previous trainings attended by general educators. Special education staff and parents cited a lack of professional development on innovations or evidenced-based practices for students with disabilities in general as well as specific strategies for the various types of disabilities. Regarding compliance, students with disabilities must be educated in their least restrictive environment (LRE) with typically developing peers to the greatest extent appropriate. In terms of LRE research, students who are educated within the general education population achieve at greater levels than those placed in more restrictive settings. In order to accomplish such, a comprehensive professional development plan cannot be developed for special education staff in isolation.

Support for administrators who facilitate IEPs, general education teachers who provide high quality instruction to most students with disabilities, instructional aides who are sometimes the first line of communication for students with disabilities (and, in many cases are provided the least amount of training), and parents who may implement strategies at home for further generalization must be considered within the context of a comprehensive, district-wide professional development plan. Attention must also be paid to special education-specific training for special education teachers and related

services staff focused on evidence-based practices in their area of expertise. Professional development must additionally focus on struggling learners *not* identified as students with disabilities (i.e., IEP or 504 Plan) who may be inappropriately referred and ultimately identified based on a lack of training and awareness by the general education staff.

Related Considerations
In many districts, this lack of aligned training is a causal factor in over-identification of certain groups, which can lead to disproportionality among race/ethnic groups and/or gender. All staff should understand and implement the Response to Instruction and Intervention (RTI) system, known as Multi-tiered System of Support (MTSS) in Washoe County School District, in order to *proactively* meet the needs of *all* students, and not singly as a process to obtain special education services. Concerns were raised as to the lack of consistency, frequency and focus of professional development based on the interests and expertise due to perspectives that these are driven by the diverse individual priorities of staff who fill the roles of Area Superintendent, Special Education Administrator, and Implementation Specialist. Lastly, mentoring support for interns, teachers in the Peer Assistance Review (PAR) program, and new credentialed teachers was fragmented and varied in the level of service for individual teachers. There is a need to address all the layers of stakeholders in the system and build successful relationships to create and sustain collaborative approaches to identifying problems, aligned solutions, and perhaps most importantly, jointly share responsibility for implementation and evaluation of said solutions.

Respondents noted that procedures for recruiting, hiring, orienting, and retaining highly qualified special education staff are either not in place, or not consistently followed. Frustration and confusion is evident at the lack of induction for understanding district policies and procedures, which lengthens the time for staff to be on-boarded. Collaboration on special education staff placement recommendations and job descriptions are not reflective of current roles. For example, Implementation Specialists suggested that they are in positions for which they weren't hired based on the recruitment job descriptions, and they are unclear regarding the expectations of the position, which varies significantly across the district. In order for staff to feel supported and connected to the district, collaboration between human resources and special education staff must be conscious, planned, frequent, and ongoing. Such collaboration involves use of data, deep level communication, and aligned professional development that results in an inclusive, personalized climate and culture. Information gathered from interviews, focus groups, and the staff survey indicate that staff believe that staffing assignments and allocation of hours are made not with program or student needs in mind, but rather in a cost-allocation priority. The inability to find and retain quality staff was often mentioned as an outcome of the lack of guidelines for staffing decisions, support for staff, low pay, and poor communication. Staffing decisions seem too often to be made in a reactive rather than a proactive manner, and are not consistently applied across the district. This dynamic is true for staffing decisions, program locations, program placements, staff expectations, and decision-making authority. Clearly articulating, in writing, the required knowledge, skills, and dispositions for each position is critical to staff members' success in understanding and meeting defined expectations.

Challenges

The Human Resources, Professional Learning, and Student Support Services staff must collectively agree, as demonstrated through their planning and actions, that collaboration between departments is essential for realization of the district vision. The ongoing commitment of time and resources is essential and will create challenges as staff shift perspectives and try to build trust. The integration of data, the development of communication procedures, and expectations for follow-through may be areas in which a breakdown in collaboration might occur. Lastly, the collaboration between individuals within and across departments cannot be based solely on the relationship of the individuals involved (e.g., the status of a friendship should not determine the level of/involvement in collaborative activities, support provided or favoritism in any way).

Opportunities and Supporting Conditions

Collaboration, if planned and executed with foresight and clarity, positively impacts the culture and climate of a system at all levels. Working with a common purpose and goal in mind increases the efficiency with which work is completed resulting in clearer communication and expectations at the site level. Administrators and teachers understand their expectations and are better prepared to support students with aligned communication, processes, procedures, and professional development. Additionally, as a result of district collaborative efforts staff retention should see a cyclical effect on the number of teachers needing to be hired as a result of attrition. Acknowledging the efforts of personnel is essential for job satisfaction and retention (e.g., past practice was to go to sites to publicly celebrate teachers at their five-year mark). When engaging in site visits and personnel discussions, it will be important to approach staff with a growth mindset, recognizing their efforts and learning how to support their growth and development.

Finally, with regard to realizing compliance through human capital supports, as with any professional learning activity or resource, it is imperative to measure the effectiveness of the activity in terms of relating to on-the-job performance. Given that the compliance department is relatively new in formation, there is an opportunity to define the department's culture as one of proactivity, with a preventative mindset, rather than reactionary to external variables such as parent complaints. By identifying compliant special education programs and IEPs, school sites can self-monitor and request assistance in identified areas such as collaborating with the site's special education and related services personnel to deliver the specialized instruction in the most effective and collaborative manner without duplicating resources.

Focus Area #5: Data Systems

Recommendation

Unify data systems in order to share accurate, timely, and actionable information across various departments and develop agreements regarding how to legally and effectively use information for a variety of purposes.

Rationale

The district has a variety of data collection systems for multiple reporting purposes contingent upon district, state, and federal requirements. The NDE requires at least six different reports throughout any school year and multiple internal data requirements exist as well. After reviewing the requested documents as defined in the scope of work and synthesizing individual interviews as well as the focus groups feedback, a comprehensive data management/application process is uncertain.

According to the 2015 Data Quality Campaign report, "data integration is the process of combining data from disparate sources into meaningful and valuable information." Maintaining different databases can cause confusion, increase the dissemination of inaccurate information to various reporting agencies, and lead to ill-advised resource allocation and/or other decisions. Funding is often associated with maintaining different data collections such as Medicaid and Nevada Department of Education (NDE) Special Education Unit Funding. For example, for the 2015 NDE Personnel Shortage reporting year, WCSD reported data from two different databases, with different personnel shortage figures generated by each. Meanwhile these data are used to determined statewide personnel shortages, which supports federal loan forgiveness programs, so the stakes are high for affected individuals. In numerous circumstances, data collected do not appear to be shared across various district departments, which results in duplicating and sometimes conflicting department level services or decisions.

Depending on the utilization of the data, there are inconsistencies in approaching what information is required, who collects the data, and how the data are stored and shared within the SSS department as well as throughout the district. It appears as if the database information relies solely on an individual person, rather than a system. There are inconsistencies within the data decision-making process to allocate resources, plan educational programs, and provide support to personnel. Data that are inaccurate or inconsistent inhibit Student Support Services staff members' abilities to make data-based decisions about teaching and learning practices and identify professional learning needs, and increases the risk of non-compliance for special education service design and implementation (e.g., eligibility, IEPs, etc.).

During the 2014-2015 school year, WCSD hired student teacher interns to fill vacant special education teacher position. The interns begin their student teaching experience as the assigned teacher for the program. Since these "interns" are not considered first year teachers, they are not assigned a mentor through New Teacher Academy and Mentoring services. Through a collaborative approach, Student Support Services

assigned implementation specialists to provide professional learning support for the interns while Human Resources hired retired personnel to provide mentoring systems. By using an integrated approach on personnel data collection, the various departments can streamline their resources and deliver a comprehensive, professional support systems for these "interns."

Data can be collected for a variety of purposes. Student Support Services maintains different databases and utilizes different data systems for collecting student data for funding and monitoring incidents for compliance mandates. The different databases that are maintained appear to be utilized for reporting purposes for different requirements such as student count or teacher allocations which begets the sense that data systems are seen as tools to meet unique and isolated reporting requirements rather than promoting a holistic, inclusive data-driven culture.

Related Considerations
Data sharing and collaborations need to be carried out in such a way as to minimize redundancy and effort in data entry, reduce data error, streamline district procedures, increase consistency for data requests, ensure the highest levels of security and protection, and eliminate unnecessary costs. Policies and procedures should be developed, or if they exist, uniformly expected, for privacy, confidentiality, and data access. These procedures are particularly important when data collectors, data managers, and other users are in different departments.

Because of the nature of the information collected, such as student and or staff information, a system for sharing the current IT policies is recommended as a preventative measure for potential security violations.

Given the recent NDE requirement of all Nevada school districts must utilize Infinite Campus by 2016-2017 school year, therefore it is expected the district will examine the Infinite Campus software as a tool to assist in streamlining various databases as well as aid in rolling out the new IEP software as part of the current student data management system in the school district.

Challenges
Identifying personnel to lead the recommendation may present a challenge due to the additional time and demands on current personnel. In addition, there may be a range of technical expertise required for using the different platforms within various databases/programs. Depending on the data programs and software, different systems may range in hardware requirements and may not be compatible with other district systems.

Establishing a data maintenance procedure and backup system requires technical expertise and cross-departmental collaboration. Depending on the environment, one challenge with the processes associated with integrating the various data systems is establishing trust among the various individuals and departments that are contributing data to the system. Data can personify power to many; thus, sharing data in a hostile environment may lead to insecurities.

Opportunities and Supporting Conditions

Currently, there are numerous databases maintained by different departments. Integrating the various databases, data collections systems and requirements, will increase district-wide communication and collaboration, will mitigate the risk of non-compliant practices, and will maximize available resources. An integrated data system will increase stakeholders' engagement and link district services and allocate resources while facilitating a data driven culture. The IT policies and procedures are posted on the WCSD Continuous Systems Improvement Website. Specific policies and procedures for an integrated data system and database administration can facilitate a culture of data decision-making processes for educational programming and resource allocations. Opportunities for professional learning regarding data utilization have implications for educational programming. There is potential to minimize costs by streamlining the number of personnel hours spent creating and collecting databases for various departments.

Focus Area #6: Resource Allocation

Recommendation

Refine decision-making processes and practices so that resource allocation is systemically driven by student performance parameters, with compliance as one criteria but not the only or primary criteria.

Rationale

Current district practices for resource allocation are designed to ensure that the system is compliant with federal and state mandates with regard to issues such as allocations of teachers to schools, student–to-teacher ratios, submission of required data, etc. However, these decisions are made based on numbers, without differentiation of students' needs as part of the decision-making process, and often in ways that seem more reactive than proactive.

Related Considerations

Several examples of decision-making processes for resource allocation were shared during the course of the qualitative data collective component of this project. These examples included descriptions of the ways in which:

- Teachers are assigned student caseloads based on flat numbers without recognition that in spite of a shared disability category eligibility, the students' needs do not necessarily require the same amount of output from the teacher;
- Schools are allocated teachers based on student numbers at the start of the school year, with insufficient proactive criteria for projecting growth expectations, such that many schools end up with a .50 FTE teacher allocation in the late winter or early spring; this is a time at which recruitment of highly qualified teachers is extremely difficult, often resulting in long-term and/or short-term substitute teachers assigned to teach those students who struggle the most to learn challenging content.
- Issues that impact student learning, such as their living in conditions of poverty, speaking English as a second language, needing social emotional supports as a result of living in foster-care, and/or other wrap around supports, are not considered in the determination of the assignment of teachers to students, and the additional amount of personnel time required to provide case management for such students and/or to differentiate instruction to meet the students' needs for successful teaching and learning conditions.

Challenges

In order to refine the district's processes such that decisions for resource allocation are systemically based on a student-centered paradigm will require:

- Deep understanding of the ways in which the current system functions
- Analysis of mobility and predictive analytics
- Engagement of root cause analysis to determine patterns and decision-making criteria

- Examination of best practices and models for resource distribution
- Commitment of additional resources to build and then operationalize a new paradigm for resource allocation and decision-making
- Stakeholder buy-in and commitment to change
- Systems thinking and deployment.

Opportunities and Supporting Conditions

District leadership is clearly committed to student success. There is teacher buy-in and commitment to help improve the system. Senior district leaders seem to understand the problem. The Nevada Legislature passed SB 508 during the 2015 Legislative session, which requires that during the second year of the biennium (2016-2017), special education units will be converted to an equivalent per pupil "weighted" formula. This legislative mandate will begin an increase in weighted formula funding over each year of subsequent biennial budgets, until the desired weight (estimated to be twice the basic per pupil guarantee) is achieved. In addition, the bill provides for the application of a multiplier for students with disabilities beginning of fiscal year 2017, replacing the current unit funding method. NDE is required to develop a comprehensive plan for weighted funding for all students.

A final note about this recommendation is that it is not a quick fix. If the district chooses to undertake this effort, it is advisable to plan for a long-term approach, with an expectation that realizing such change will likely take anywhere from three to seven years or more, as informed by the literature in systems change, and that this timeframe itself relies upon quality improvement planning and attention to impementation science.

A Final Note

Washoe County School District has engaged prior external organizations to make recommendations about systems to improve the performance of special education students. There is a far-reaching perspective that recommendations that arose from these past efforts did come to fruition, and there is broad concern that this current district effort will become a report on a shelf that does not change district systems and hence does not change outcomes for children. WestEd strongly advises the District to document implementation efforts and share those strategically with both stakeholders internal and external to, the organization.

Appendix:

Artifacts Reviewed

Document	Document Description	Document Source
Nevada Department of Education — State Reports		
2013-2014 and 2014-2015 Special Education State Complaint Reports and Corrective Action Plans	Provides an overview on the various complaints filed with the Department regarding a district's special education services.	http://www.doe.nv.gov/Special_Education/Reports/Complaint_Reports/
Nevada Equity Plan	U.S. Department of Education Initiative Excellent Educators for All. June 2015	Nevada Department of Education
Nevada Legislative Updates	Overall update of Education Legislation passed June 2015	http://www.doe.nv.gov/Legislative/NDE_Legislative_Implementation_Report/
Nevada Personnel Shortage Information	Overall description of Nevada Personnel Shortages between 2005-2015	NSHA/NV Coalition to Address Related Service Personnel Shortage Areas
Teacher Pipeline Information	Since December 2014, stakeholders convening to identify key challenges and solutions to the teacher pipeline crisis.	NSHA/NV Coalition to Address Related Service Personnel Shortage Areas
Nevada State Systemic Improvement Plan (SSIP) for the Achievement of Students with Disabilities FFY 2013 – FFY 2018	State's systemic improvement plan (SSIP) and is appropriate to accomplishing the state-identified measurable result (SIMR).	http://www.doe.nv.gov/Special_Education/Reports/SSIP/
Washoe County School District (WCSD) Forms to Guide Continuous Improvement and Alignment		
2015-2016 Balanced Calendar	District Calendar	WCSD Website
Continuous Systems Improvement Website	Continuous Systems Improvement (CSI) is a quality management system that focuses on high performance and customers.	http://www.washoecountyschools.net/csi/
Stetson Report	Report summarizes Stetson evaluation of the quality and impact of services provided to students with disabilities. (2010)	WCSD
Various Job Description	Identifies Summary Description, Duties/Responsibilities, Employment Standards/License	Includes: Chief Student Support Services Officer Student Support Services Executive Director Special Education Area Administrator, Compliance Coordinator, Student Support Services Compliance Specialist, Implementation Specialist
WCSD Budget Presentation to Board, May 2015	Presentation to WCSD School Board	WCSD Website
WCSD Budget Narrative to the Board, May 2015	Presentation to WCSD School Board	WCSD Website
WCSD Strategic Plan	www.washoeschools.net	WCSD Website
WCSD Student Support Services Department (SSS) Documents		
2015-2016 Staffing Assignments	Identifies Overall Assignments No roles or responsibilities	SSS Leadership

Document	Document Description	Document Source
SSS Policy and Procedures	Procedures posted regarding different procedures and practices	SSS Compliance Office CSI Website
Special Education Responsibility Chart for District Department	Highlights The Office of Superintendent, Office of School Performance, and Office of Academics	SSS Leadership
SSS Fast Facts Monthly Newsletter	Monthly staff newsletter from compliance	SSS Compliance Office
Presentation Materials	Defensible IEPs	SSS Compliance Office
	LEA Responsibilities- Overview on roles and responsibilities	SSS Compliance Office SSS Compliance Office
	Aversive Restraints: WCSD	SSS Compliance Office
	IEP Snapshot	SSS Compliance Office
Email Sample	Sample of technical assistance	SSS Compliance Office
Special Education Program Descriptions	Draft and not disseminated to teachers	SSS Compliance Office
SSS Department Plans 2013-2014 Presented to the Board, April 2014	Overview of Student Support Services, Psychological Services, and Health Services	WCSD Website
IEP Snapshot Checklist	Required from 9/2014 Corrective Action Plan Report	SSS Compliance Office
Nevada Department of Education State Complaints 2013-2015 Database	State Complaints Reports 2013-2015	SSS Compliance Office
	Corrective Action Plans (CAPs) 2013-2015	SSS Compliance Office
	Documents associated with current CAPS: Training Sign-ins, Training Logs Training Evaluation	SSS Compliance Office
Behavior Data Collection Documentation	2014-2015 Behavior data	Dr. Betsy Sexton
Multi-tiered Systems of Support (MTSS) Process Resources	Webpage for MTSS Resources, Guidelines, and Personnel	WCSD Website http://www.washoeschools.net/Page/568
Procedures for Reviewing AB 280/56 Aversive Restraints and Interventions	Draft document of policies	SSS Compliance Office
WCSD Board Presentation May 2015	SSS presentation of Departmental changes	SSS Leadership
Student Support Services Department Work WCSD May 1 2015 Department Retreat Presentation	SSS Presentation and outline for reflection, team building, and action steps. Additional Meetings include: **SSS Team Meeting May 28, 2015** Purpose: team building, determine role/goal of SEAA position, build communication norms. **June 18, 2015** Team meet with respective ED team building, discuss and plan Options SSS programming overlap (e.g. behavior) **SSS Team Meeting August 4, 2015** Team Building, Finalize SEA assignment, prepare for school year,	SSS Leadership
Student Support Services Town Hall Meeting Summary	Various Meetings Held Spring 2015	WCSD Program Evaluation and Research

Document	Document Description	Document Source
WestEd Data Collection Tools		
Document Checklist	List for documenting data collection.	
Focus Group Interview Protocols	Focus group protocols for various groups: Teachers, Administrators, Specialized Program Staff, & Parents	
Individual Interview Protocols	Individual protocols for various administrative, certified, and educational support professionals staff	
State Complaint Checklist	WestEd generated a list of state complaints for documenting review.	
WCSD Administrative Survey	WestEd-designed survey	
WCSD Teacher Survey	WestEd-designed survey	

Appendix:

Roles of Interviewees, Focus Group Members, and Personnel Surveyed

Washoe County School District
Superintendent Chief Student Support Services Officer Area Superintendents Office of School Performance Representative Legal Department Representative Executive Cabinet Members School Board Representative Executive Directors of Student Support Services Special Education Area Administrators Student Support Services Implementation Specialists Student Support Services Data Specialist Student Support Services Compliance Representative Student Support Services Education Support Professionals Representative Teachers Site Administrators Parents of Special Education Students
Nevada Department of Education
State Director for Special Education