

5/31/2022

TO: Brent Jones, Superintendent
Seattle Public Schools

FROM: Dr. Tania May, Assistant Superintendent of Special Education, OSPI

RE: 2021-22 WISM Final Special Education Combo Program & Fiscal Report

On April 19-20, 2022, a team from the Office of Superintendent of Public Instruction (OSPI) conducted a special education program and fiscal systems analysis review in your district as part of the Washington Integrated System of Monitoring (WISM). This report includes commendations, technical assistance, and required actions (if any) that were identified during the review.

Special education program reviews focused on the provision of special education services, including recovery services; educational benefit and student outcomes; collection and reporting of data, including IEP progress data; and the use of data for continuous improvement. Special education fiscal reviews focused on the district's ability to implement fiscal procedures that ensure grant funds are used for authorized purposes in compliance with laws and regulations; have internal controls that ensure reliable financial reporting and accountability; and evaluate best practices.

Commendations:

Program	Commendation Note
20. WISM	<ul style="list-style-type: none"><li data-bbox="402 1058 1398 1213">• 20.2 - (Data and Decision Making) - In the Opening Session, the district shared an online Special Education Dashboard that was created to compile and analyze data based on a variety of categories, including race/ethnicity, gender, grades, LRE placement, eligibility category, attendance, discipline, service pathways, homelessness, High School and Beyond Plans (HSBPs), and more.<li data-bbox="402 1255 1424 1535">• 20.3 - (Family / Community Engagement) - In the Opening Session and the Systems Analysis Questionnaire, the district shared they host monthly forums with families and community members to provide information, listen to feedback, answer questions, and learn the perspectives of families from diverse cultures and languages, such as Somali, Latinx, and East Africa. Participants in the student interviews reported that they know who to go to at school when they are having issues or need support. Participants in the private school interviews reported that parent feedback regarding equitable services is discussed during the consultation process, and parent representatives are invited to attend the consultation meetings.<li data-bbox="402 1577 1424 1791">• 20.8 (Secondary Transition) - All nine of the files reviewed for secondary transition contained an IEP with all of the required transition components, including age-appropriate transition assessment information, measurable post-secondary goals, transition services, course(s) of study, and evidence the student was invited to participate in the transition IEP meeting. The nine files also contained HSBPs that included all of the required HSBP components. Participants in the Secondary Transition Focus Groups indicated that training has been provided to secondary counselors and administrators for tracking graduation

	<p>pathways and monitoring student progress. Students have access to the Naviance HSBP tool for planning, and are provided assistance when needed.</p> <ul style="list-style-type: none"> • 20.8 (Secondary Transition) - Participants in the Secondary Transition Focus Groups shared their work in creating opportunities and implementing supports for students and families to understand opportunities in the community, including organizations that support transition, career connections, scholarships, financial aid, and access to mental health support as needed. Based on the Performance Data Profile, the district met the state target for post-school engagement rates for students with IEPs and the post-school survey response rate (Indicator B-14) for its 2019 leavers. • 20.11 through 20.14 (IEP Implementation and Educational Benefit) – The district submitted a copy of its comprehensive Professional Development Course Catalog for the 2021-22 school year. Participants in the service provider interviews reported engaging in professional development opportunities in the areas of Universal Design for Learning (UDL), instructional technology, equity, social justice, crisis intervention, inclusive practices, reading and math curriculum, trauma-informed practices, social emotional learning, school safety, and more. • 20.14 (Recovery Services) – 27 of the 30 files reviewed for actively enrolled students contained documentation that the student’s need for recovery services as a result of the COVID-19 pandemic was discussed and determined by the IEP team. These decisions were documented using a Recovery Services Planning and Communication Tool that included a review and discussion of: (a) the student’s level of participation in remote instruction during school facility closures, (b) data on the student’s progress toward meeting the annual goals, (c) determination of whether recovery services were needed and the rationale for the determination, and (d) a description of the recovery services (if determined needed by the IEP team). • 20.11 through 20.14 (IEP Implementation and Educational Benefit) – The district has continued implementation of its 2017-18 Substantial Compliance Monitoring Process submitted as part of the Revised Comprehensive Corrective Action Plan originally developed in 2014, including: (a) regularly updating and disseminating the district's Special Education Procedural Handbook, (b) central office staff conducting random reviews of special education files, (c) using data dashboards to monitor implementation of special education services and other areas, and (d) providing ongoing coaching as part of regional site visits.
22. Special Education – Fiscal	<ul style="list-style-type: none"> • 22 (Fiscal) - District staff were friendly and a pleasure to work with.

Technical Assistance:

Program	Technical Assistance Note
20. WISM	<ul style="list-style-type: none"> • 20.4 (Child Find) and 20.7 (Early Childhood) - It is recommended the district: (1) review its early childhood enrollment forms and processes to identify and address potential barriers that may prevent or discourage families from following through on a referral for special education, and (2) ensure that strategies are implemented to support language access for families in completing this process. In addition, the district is reminded that delaying an

initial evaluation due to lack of space within a program or requiring the family to complete the enrollment forms, are not considered allowable exceptions under Indicators B-11 (Timely Initial Evaluations) and B-12 (Timely Part C to Part B Transition).

- 20.5 (LRE) and 20.7 (Early Childhood) - The district offers a continuum of service options for early childhood special education and partnerships for preschool inclusion. While the district met the state target for preschool students with IEPs ages 3-5 who: (1) receive special education services in a regular early childhood program (Indicator B-6A) and (2) receive special education services in a separate special education class or school (Indicator B-6B), the district and the state are well below the national average for Indicator B-6. The following are recommendations for the district to consider:

a. Assess the district's current continuum of alternative placement options to identify additional access points for children with disabilities within existing district and community-based programs, and engage with additional community partners to provide services to children within their natural environment with non-disabled peers.

b. Review the district's current technical assistance and professional learning related to LRE and Child Find in partnership with the Puget Sound Educational Service District (ESD).

c. Participate in the current Washington state early childhood special education initiatives related to the implementation of inclusionary practices and multi-tiered system of supports (MTSS), preschool through grade 12, to enhance current practices and ensure equitable access for all children across robust early learning systems. More information about these initiatives can be found on OSPI's [Preschool LRE webpage](#).

- 20.9 (Disproportionality) - The district was identified in 2020-21 as having disproportionate overrepresentation for students identified as American Indian/Alaska Native who are eligible for special education, and for students identified as Hispanic who are eligible under the disability category of Specific Learning Disability (SLD). The district was also designated as having significant disproportionality with regard to students identified as American Indian who are eligible under the category of SLD and students identified as Black who are eligible under the category of Intellectual Disability. In the district's 2021-22 Disproportionality Workbook and during the Management Session, the district described efforts to address disproportionality including new staff and commitments to implementation of district wide Multi-Tiered System of Supports (MTSS) across schools, a strategic plan focused on educational justice and equitable access, a leadership team and Learning Support Lead dedicated to addressing outcomes and disproportionality, and the creation of a Special Education Department Dashboard to monitor and respond to the implementation of the district's Comprehensive Coordinated Early Intervening Services (CCEIS) plan. The district is encouraged to continue its efforts to address disproportionality. Additional resources, including [disproportionality self-study tools](#) can be found on [OSPI's Disproportionality Technical Assistance website](#).
- 20.11 (Progress & Educational Benefit) – Seven of the 30 student progress reports reviewed did not include actual information/data as stated in the goal about the student's progress toward the annual goals. The district is encouraged to review and disseminate the progress reporting tip from OSPI's [September 2018 Special Education Monthly Update](#) (beginning on page 5).
- 20.11 through 20.14 (IEP Implementation and Educational Benefit) - Participants in the parent interviews reported that it is sometimes difficult and time-consuming to navigate the

	district's chain of command when there is a concern. They also shared some concerns over the implementation of accommodations in general education classes.
22. Special Education – Fiscal	<ul style="list-style-type: none"> 22.3 (Time and Effort) - The district is reminded that signatures should be included in <u>all</u> Time and Effort certifications.

Required Actions:

Program	Number	Description	Actions Required
WISM	20.6	Discipline	In one file (file 12), it does not appear that services were provided during the disciplinary removals. This issue is required to be corrected as soon as possible but no later than March 1, 2023, through the 2022-23 IDEA Compliance Package (iGrants Form Package 442).
WISM	20.9	Disproportionality	In one of the twelve files reviewed for disproportionality (file 2), the reevaluation has no current data to reconfirm the student's disability, the adverse educational impact of the disability, and the need for special education and related services. This issue is required to be corrected as soon as possible but no later than March 1, 2023, through the 2022-23 IDEA Compliance Package (iGrants Form Package 442).
WISM	20.12	Evaluation and IEP Development	<ul style="list-style-type: none"> In one of the 33 files reviewed (file 21), the student was participating in the WA-AIM, but the IEP did not contain a statement of benchmarks/objectives. In one of the 33 files reviewed (file 2), the IEP was missing the required information related to statewide assessments and accommodations. <p>These issues are required to be corrected as soon as possible but no later than March 1, 2023, through the 2022-23 IDEA Compliance Package (iGrants Form Package 442).</p>
Fiscal	22.3	Time and Effort	22.3(F) - Support for the distribution of the employee's salary or wages among specific activities of cost objectives was unable to be confirmed. The district is required to submit a Program 24 Total Payroll distribution report for staff member ID#00820894 (initials J.A.) to support the distribution of the employee's salary or wages during the reporting period. Submit the documentation to WISM@k12.wa.us no later than June 30, 2022.

The district has 30 calendar days from the date of this report to request reconsideration of any of the required actions identified. After the reconsideration window has closed, the results of the monitoring review will be considered final.

Please find attached to this report the following Appendices:

- A. WISM Program and Fiscal Checklists – Outline the special education program and fiscal areas reviewed as part of the systems analysis, as well as the activities, information, and documentation reviewed for each area.

- B. Consistency Index – Related to the district’s student files reviewed as part of the program review, this graphic shows the congruency between: (a) the student’s sufficient evaluation for special education services, (b) the development of a properly formulated IEP, and (c) the provision of specially designed instruction (SDI) and related services to that student.
- C. Classroom Observation Summaries – A description what was observed during the informal classroom visitations that were completed during the onsite portion of the program review.

Additional information and resources related to the student-level review will be provided to the district’s special education administrator. These resources will include IEP and Evaluation Review Forms for any student record with a technical assistance note or required correction, and a student-specific correction summary template that the district can use to document the correction of identified student file issues as part of the 2022-23 IDEA Compliance Package (iGrants Form Package 442).

In addition, parents/guardians of all enrolled students eligible for special education services in the district have the opportunity to respond to a normed, nationally-vetted Parent Survey directly linked to the Washington State Performance Plan, Indicator B-8 – Parent Involvement. The measurement for Indicator B-8 relates specifically to parent perception of the district’s attempts to partner with them. The district will receive the parent survey results along with resources for strengthening parent involvement, under a separate cover letter once the results are available, which we currently anticipate being mid June.

We appreciate the cooperation and assistance provided by the school district throughout the special education systems analysis process. We look forward to ongoing collaboration towards improved educational results for students with disabilities and their families. If you have any questions about the monitoring process, this report, or wish to request technical assistance, please do not hesitate to contact Jennifer Story, Special Education Program Improvement Coordinator at 360-725-6075 or by email at jennifer.story@k12.wa.us.

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