Study Session

Tuesday, August 12, 2025 5:00 PM
Board Assembly Room, 1250 West Broadway Avenue, Minneapolis, Minnesota 55411

1) **Call to Order and Roll Call**

2) **Presentations and Discussions**

2) a. Special Education Services and Multi-Tiered System of Support (MTSS)

3) **Adjournment**

August 12, 2025

Improving Systems for Students with Disabilities in MPS

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Session Overview

- **Introduction**
- **Special Education in Minneapolis Public Schools**
    - Information on Special Education
- **Council of Great City Schools (CGCS) Review**
    - Multi-Tiered System of Supports (MTSS)
    - Special Education Programming
    - Special Education Achievement
- **Disproportionality and CEIS Plan for MPS**
- **Overall Summary and Recommendations**

Special Education in Minneapolis Public Schools

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Objective

Provide an high level Overview of Special Education

- Develop understanding of trends
  - Student population trends
  - Budget trends
- Grounding the understanding of funding
- Staffing ratios - MN Revisor and MPS

What is Special Education?

Congress enacted the Education for All Handicapped Children Act (Public Law 94-142), also known as the EHA, in 1975 to support states and localities in protecting the rights of, meeting the individual needs of, and improving the results for infants, toddlers, children, and youth with disabilities and their families.

This landmark law's name changed to the Individuals with Disabilities Education Act, or IDEA, in a 1990 reauthorization. The law was last reauthorized in 2004, and the department has periodically issued new or revised regulations to address the implementation and interpretation of the IDEA(Individuals with Disabilities Education Act).

Before EHA, many children were denied access to education and opportunities to learn. In 1970, U.S. schools educated only one in five children with disabilities, and many states had laws excluding certain students, including children who were deaf, blind, emotionally disturbed, or had an intellectual disability.

MPS Special Education Percentages SY 2024-25

National: 14.8%

Minnesota: 16.18%

Minneapolis Public Schools: 18.6%

Special Education Categories

- **Autism Spectrum Disorder (ASD):** Affects social and communication skills, and can impact behavior.
- **Blind -Visual Impairment (BVI):** Vision loss that significantly impacts a student's ability to visually interpret information.
- **Deaf and Hard of Hearing (DHH):** Hearing loss that significantly impacts a student's ability to process linguistic information.
- **Emotional Behavior Disability (EBD):** Includes conditions like anxiety disorders, depression, and other emotional or behavioral issues.
- **Developmental Delay:** Includes children to age 7 who are experiencing a measurable delay in development according to diagnostic instruments and procedures

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Special Education Categories

- **Developmental Cognitive Disabilities: Mild Moderate (DCD-MM):** Significant limitations in intellectual functioning and adaptive behavior.
- **Developmental Cognitive Disabilities: Severe Profound (DCD-SP):** The presence of two or more disabilities, such as intellectual disability and blindness.
- **Orthopedic Impairment:** Conditions that affect a student's physical mobility
- **Other Health Impairment (OHI):** Covers a wide range of conditions that limit a student's strength, energy, or alertness, like ADHD, epilepsy, or sickle cell anemia.

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Special Education Categories

- **Specific Learning Disability(SLD):** Difficulties in one or more basic psychological processes involved in understanding or using language, like dyslexia or dysgraphia.
- **Speech Language Impairment:** Problems with communication, including articulation, fluency, or language development.
- **Traumatic Brain Injury (TBI):** Brain injury caused by an external force.
- **Visual Impairment (VI):** Any degree of vision loss that affects a student's ability to learn.

Special Education Programs

Federal Setting I: (0-21% of the school day receiving special education services): Students spend the majority of their day in the general education classroom, receiving special education and related services outside the regular classroom for less than 21% of the school day.

Federal Setting II: (21-60% of the school day receiving special education services): Students receive special education and related services outside the regular classroom for at least 21% but no more than 60% of the school day, often in a resource room.

Federal Setting III: (More than 60% of the school day receiving special education services): Students receive special education and related services outside the regular classroom for more than 60% of the school day.

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Special Education Programs

Federal Setting IV: (Separate school or facility): Students receive special education and related services in a separate public day school facility (or private school) for more than 50% of the school day.

Care and Treatment and Hospital Setting: Separate facilities and programs. Students may be in special education or general education. Special education is the supportive program for students.

Special Education Programs

These settings are crucial for ensuring that students with disabilities receive the appropriate level of support and services within the least restrictive environment (LRE) as mandated by IDEA.

The LRE principle emphasizes that students with disabilities should be educated with their non-disabled peers to the maximum extent appropriate.

Each district is responsible for providing programming and supports for students with disabilities in all setting. Providing access to general education as much as possible for each student to have a high quality education.

Special Education Programs

Least Restrictive Environment Percentages/Averages

Minneapolis Public Schools: LRE 1 and 2	45%
Minnesota: LRE 1 and 2	62.5%
Nationally: LRE 1 and 2	65%

Council of Great City Schools (CGCS) Review

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Why the Review Was Commissioned

- **Spring 2024 - Superintendent's 100 day plan included a listening tour.**
  a. A major theme included feedback about special education in MPS.
- **Fall 2024 - The Council of Great City Schools was commissioned to:**
  a. Better understand Special Education and supports for students
  b. Better understand areas of growth necessary to increase student supports
  c. Build a road map for improving supports and services for students with disabilities

What is a CGCS Review?

- **CGCS is the nation's primary coalition of large urban public-school systems**
- **CGCS has conducted 37 special education reviews with reports and recommendations**
- **Goal of review: Comprehensive understanding of special education and supports in a school district**
    a. Focuses on special education and systems that support MTSS
    b. Reviews all data within the system
    c. On-site interviews with community, staff and families
    d. Observations
    e. Final report

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CGCS Focus Areas

The CGCS focused on broad areas, with recommendations:

- Multi-Tiered Systems of Support (MTSS) to accelerate student achievement and well-being
- Disability demographics and eligibility
- Data impacting students with disabilities (SwD) achievement
- Recommendations for building a long-range plan for improving supports and services

Multi-Tiered System of Supports (MTSS)

MTSS Overview

Multi-Tiered System of Supports

- Framework for schools
- Identify and support students in:
  - Literacy
  - Mathematics
  - Social-emotional learning
- Tiers are based on individual student needs
- Ensuring all students have access to resources and interventions

MTSS to Accelerate Achievement

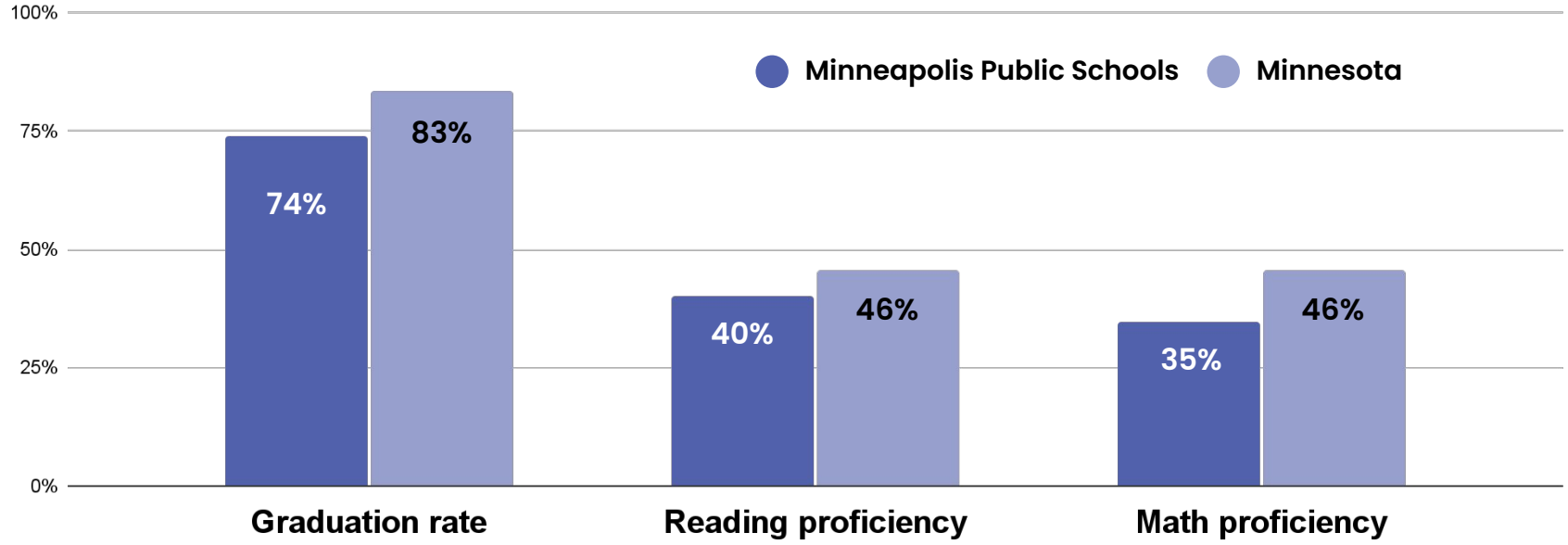
Current MTSS framework – literacy and math:

- MTSS struggles as a consistent plan for interventions in schools
- No defined department or personnel directly supporting MTSS
- MPS has a 20+ year history of using problem-solving and progress monitoring
- These practices fell off due to staffing changes and the pandemic

Multi-Tiered System of Supports (MTSS) Data Review

MTSS to Accelerate Achievement

Graduation & Achievement Data:



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MTSS – Suspension Data

Black students without disabilities:

- **Out-of-school for 1+ days:** 23.3x more likely
- **Out-of-school for 10+ days:** 71.2x more likely
- **In-School:** 19.7x more likely

Multi-Tiered System of Supports (MTSS) Recommendations

MTSS Recommendation – Policy Update

- **Update MPS Board *Policy 6121* to implement trauma-based care and supports**
- **Develop:**
  - Comprehensive MTSS framework
  - Full MTSS guide

MTSS Recommendation – Personnel Alignment

- Create a new MTSS leadership position
- Lead framework development and implementation
- Establish MTSS department with specific positions
- Establish MTSS district team that includes cross department functions and collaboration

MTSS Recommendation – Leadership Structure

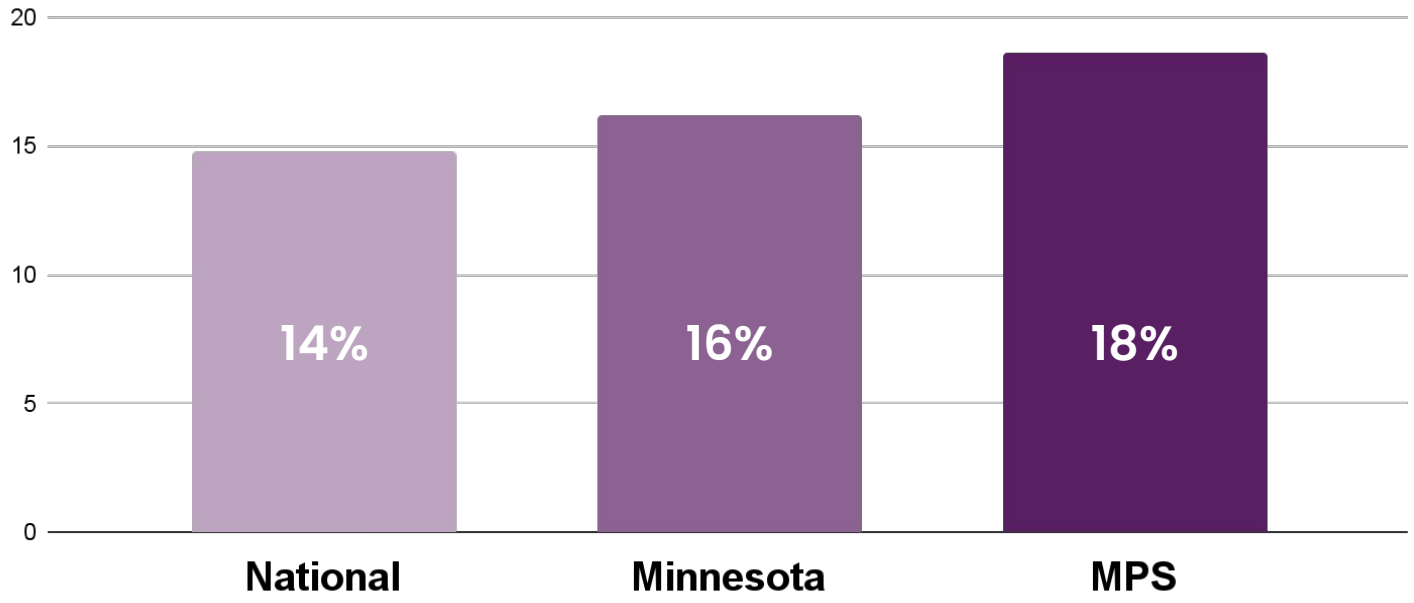
- Build school-department relationships
- Create leadership teams under associate superintendents
- Departmental support teams for each school portfolio

MTSS Recommendation – Accountability

- Set key performance indicators (KPIs) for MTSS implementation
- Define expectations for MTSS in schools
- Create feedback loops with schools and district

Special Education Programming

Disability Rates Overview



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Risk Ratios by Race

A student group that is twice as likely as others to have a characteristic becomes concerning.

- **Black Students with Disabilities (SwDs):**
  - Developmental Cognitive Disability (DCD)/Mild-Moderate: **3.2**
  - Developmental Cognitive Disability (DCD)/Severe-Profound: **4.2**
  - Emotional Behavior Disability (EBD): **2.5**
- **American Indian Students with Disabilities (SwDs):**
  - Emotional Behavior Disability (EBD): **(3.8)**

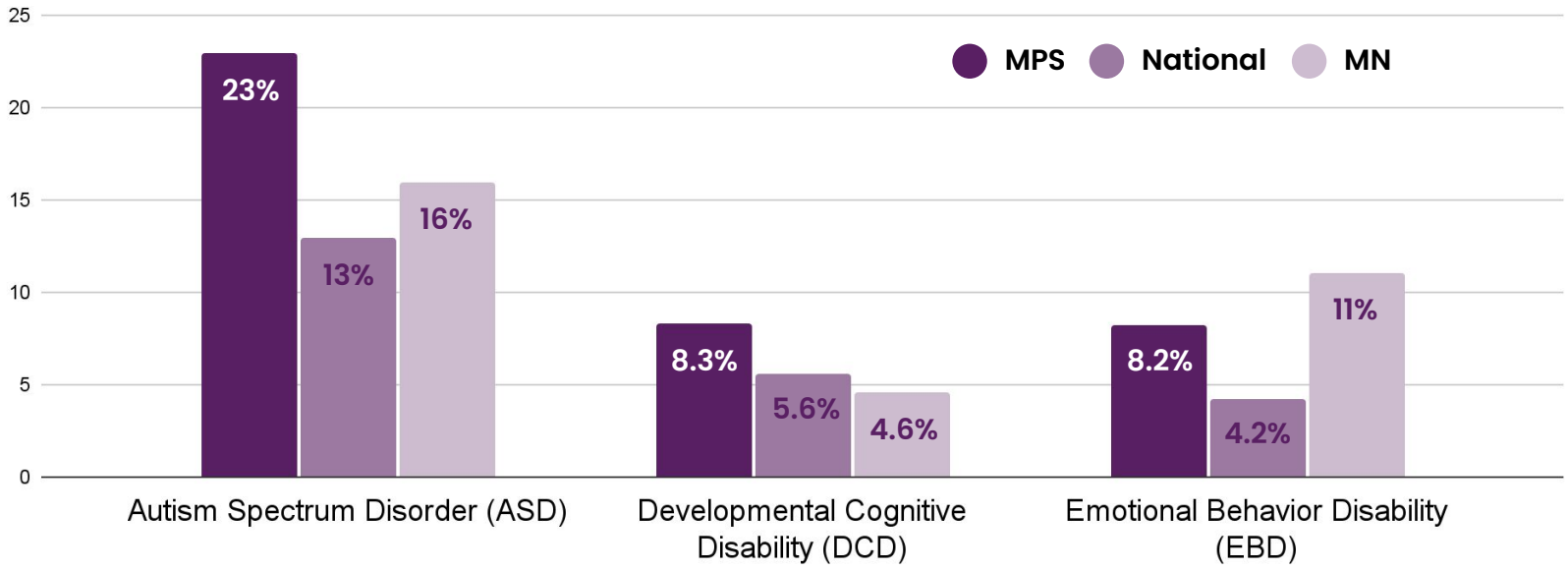
Risk Ratios – Gender + Race

Black male SwDs vs. non-Black male SwDs:

- **Males were twice as likely to be identified with certain disabilities.**
- **Black Students with Disabilities (SwDs):**
  - Developmental Cognitive Disability (DCD)/Mild-Moderate: **4.05**
  - Developmental Cognitive Disability (DCD)/Severe-Profound: **3.50**
  - Severely Multiply Impaired: **3.97**

High-Prevalence Disabilities

Black male Students with Disabilities (SwDs) vs. non-Black male SwDs:



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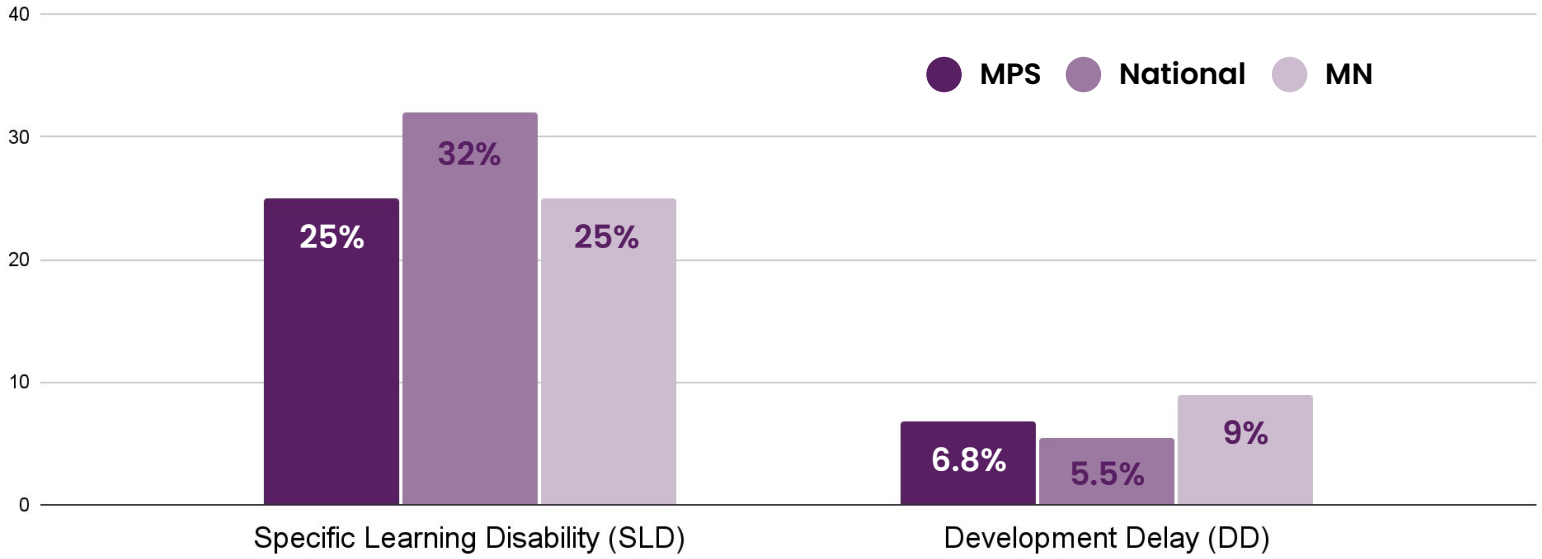
Lower-Rate Disabilities

The following areas show MPS rates that are equal to or lower than state averages and lower than national rates:



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Least Restrictive Environment (LRE) Overview

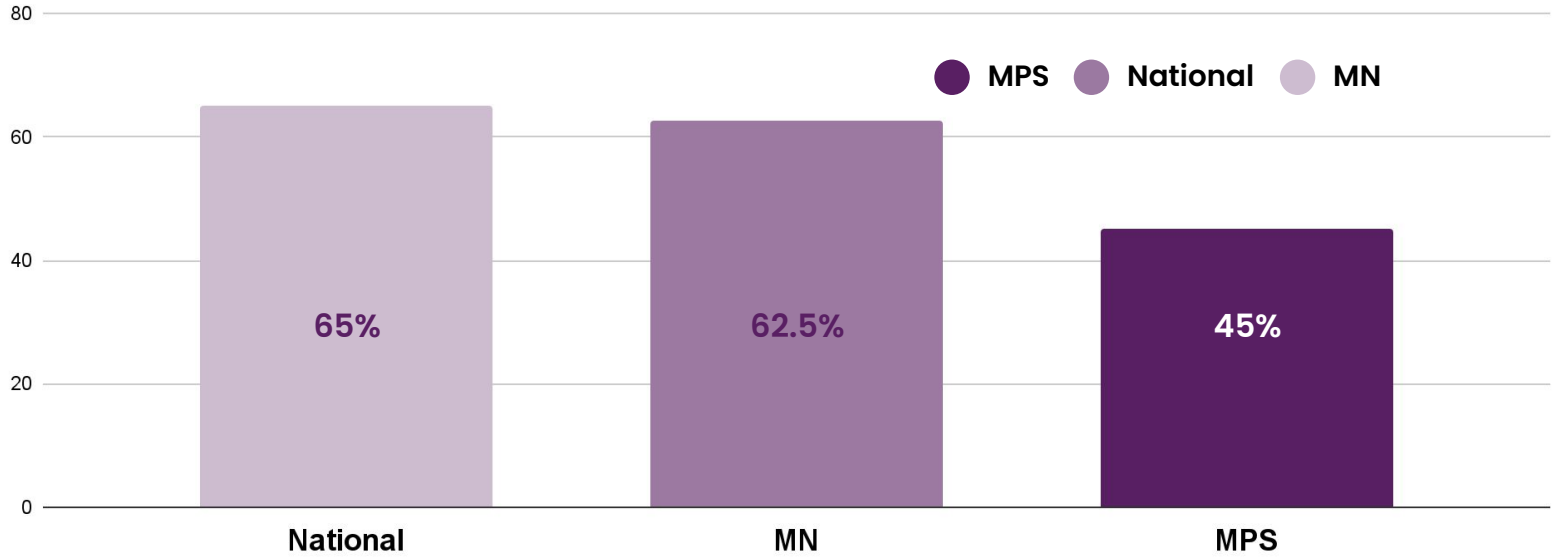
Minneapolis has a higher rate than both Minnesota and the national average for placing students in separate settings.

Black students are four times more likely to be placed in:

- Level III settings (receiving special education 60–100% of the day)
- Separate school programs (receiving special education 100% of the day)

LRE Comparison

Least Restrictive Settings (LRE 1 and 2)



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Special Education Achievement Data

Reading Proficiency

Reading proficiency rates for 2022–2023 were significantly below state State Performance Plan (SPP) targets:

- **From 2022 to 2024, MPS data showed an increase in overall proficiency from 19.5% to 23.4%.**
  - Minnesota SwD Reading Proficiency Rate: **28.8%**
  - Minneapolis Public Schools SwD Reading Proficiency Rate: **23.4%**

Math Proficiency

Math proficiency rates for 2022–2023 were significantly below state targets:

- **From 2022 to 2024, MPS reported an increase in overall proficiency from 15.4% to 20.1%.**
  - Minnesota SwD Math Proficiency Rate: **26.3%**
  - Minneapolis Public Schools SwD Math Proficiency Rate: **20.1%**

Graduation and Dropout

- **Graduation: SwD MPS 52% vs. MN 90%**
  - American Indian students: **25%**
- **Dropout: SwD MPS 9.95% (target: <9.4%)**
  - American Indian Students with Disability: **19.4%**

Suspension Patterns

- Black SwD: Out-of-School Suspension (OSS) 3.23 / 4.93
  - (1+ days / 10+ days)
- American Indian SwD: Out-of-School Suspension (OSS) 8.5
- In-School Suspension(ISS)Black SwD 19.7
- Peak suspension grades: 6–8

Summary & Recommendations

MTSS Work Needed

- Create MTSS plan
- Hire MTSS leadership
- Address reading, math, SEL
- Accountability through data
- Create cross district wide committee with department representatives

Special Education Eligibility

- Improve inclusion
- Reduce restrictive settings
- Address over-identification of black students
- Address high suspension rates of black students

Suspension and Inclusion Focus

- Collaborate across departments
- Expand inclusion/co-teaching
- Define specially designed instruction
- Create defined curriculum for special education classrooms
- Create defined professional development

Questions

Disproportionality & CEIS – Minneapolis Public Schools

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What Is Significant Disproportionality & Coordinated Early Intervening Services (CEIS)?

CEIS or Significant Disproportionality

Purpose of this presentation:

- Review what is Significant Disproportionality and CEIS: Coordinated Early Intervening Services
- Review the requirements for the district
- Review plan

CEIS or Significant Disproportionality

Three areas to discuss and explain:

- What is Disproportionality?
- How do districts become identified?
- What is CEIS: Coordinated Early Intervening Services?

Significant Disproportionality

Districts are identified by the risk ratio methodology:

A standard risk ratio of 3.0, OR an Alternate Risk Ratio of 3.0 in three categorical areas of special education:

A. special education identification category

B. special education placement category

C. special education discipline category

Significant Disproportionality

Identified Mandatory (Year 3 Status):

Districts identified Mandatory Year status need to:

1. **Create a plan** for the correction (action plan and funds) of the identified area and submit to MDE by July 1 of the year they are in mandatory status. Plan and funds have to be used for students NOT in special education.
2. **Set aside 15 percent of its IDEA, Part B funds** (sections 611 and 619) funds) to provide comprehensive coordinated early intervening services (comprehensive CEIS) to address factors contributing to the significant disproportionality.
3. **Public notification by June 30, 2026.**

MPS Identification Status

Significant Disproportionality

Minneapolis Public Schools has been identified for 1 mandatory area and 2 areas for watching

Mandatory

- Black or African American students with disabilities identified as Development Cognitive Disability (DCD)

Year 1 Voluntary

- Black or African American students with disabilities identified as having Out-of-School Suspensions more than 10 days

Year 2 Voluntary

- Black or African American students with disabilities identified as having Total Disciplinary Removal

Risk Ratios & Student Demographics

Data Review

Reviewed Special Education Settings by Race

- Special education Federal Setting 1 and 2 by race
- Special education Federal Setting 3 by race
- DCD classrooms by race

Reviewed: Referral Rates

Reviewed: Suspension Rates

- Suspension rates by race for last 3 years: individual suspensions and over 10 days
- Suspension rates of special education students by race and over 10 days

CEIS Plan Overview

MTSS

Focus on Multi-Tiered Systems of Support

- Research supports the use of Multi-Tiered Systems of Support (MTSS) for various areas, including behavior, academics, and social-emotional well-being. MTSS is a framework that provides a multi-tiered approach to addressing student needs, with increasing levels of support based on student needs.
    - **Improved Academic Achievement:**
      MTSS helps identify struggling learners early and provides targeted interventions, leading to improved academic outcomes.
    - **Reduced Discipline Issues:**
      By addressing social-emotional needs and providing positive behavioral supports, MTSS can reduce disciplinary incidents.

Significant Disproportionality

Minneapolis Public Schools Risk Ratios Above 3.0

Category	2022	2023	2024
Cognitive Disabilities Identification	3.003	3.340	3.536
Out of School Suspension more than 10 days	2.647	2.506	4.498
Total Discipline Removals	2.622	3.087	3.306

CEIS Plan Focus

The CEIS Plan:

- **Focus on elementary level**
  - Small number of schools with DCD program(s)
  - Focus on MTSS for academics and social emotional learning
- **Focus on systems within special education**
  - Interventionist for special education for suspension rates
- **Focus on reviewing practices and increasing inclusion**
  - School psychologists, Child study teams, ECSE to K transition, Building out inclusion

CEIS Goals

CEIS Plan Focus

- **Goal 1: Reduce identification rates of Black/African American students in DCD.** The district will reduce the rates by 10% by providing supports for intervention in academics at the 6 identified elementary schools. (currently 154 students)
- **Goal 2: The elementary schools, identified, will increase the inclusion practices by 20% for students in the DCD programs.** Given the baseline data from the identified schools. The students in the DCD programs will increase time with their peers, academics and supports for all students in the program.
- **Goal 3: Focusing on the nine identified schools, the district will reduce the suspension rates of the special education students by 20%.** Given the baseline data of suspension rates in 9 elementary schools, the district will provide additional intervention supports to those schools to decrease the out of school suspensions for special education students.

CEIS Plan

CEIS Plan Focus

The CEIS Plan: Focus on elementary level

1. **Identify 6 schools to focus on to support DCD programming**
    a. Focus on identification process for special education with intensive interventions
    b. Focus on academic supports/interventions in schools

CEIS Plan Focus

The CEIS Plan: Focus on elementary level

1. **Identify 9 schools to focus on suspension rates for students with special education supports (1 FTE)**
   a. Focus on reducing the suspension rates of students with disabilities in the nine identified schools by 10% by the end of 2026 school year

CEIS Budget

- **MTSS**
  - 6 FTE positions for the identified elementary schools
- **Suspensions**
  - 1 FTE for 9 elementary schools
- **Extra Pay for Planning:**
  - 1 day retreat for identified school teams
  - Planning for teams prior to school
  - Planning for inclusion
  - Professional development for co-teaching or inclusionary practices
- **Conference for CEIS specific strategies**

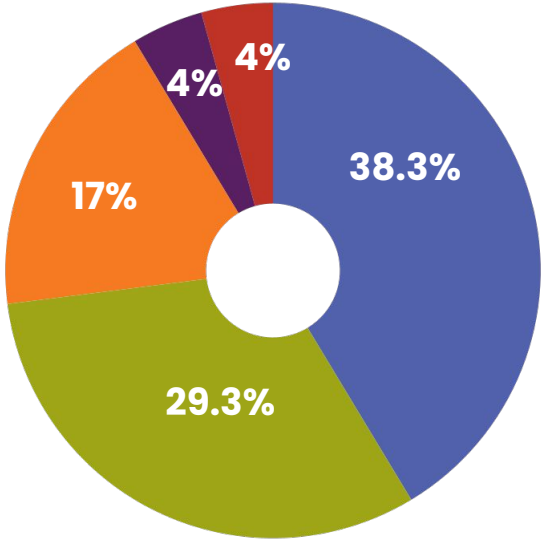
15% of Federal Funds: ~$1.2 million

Final Thoughts & Reflection

Appendix

Data for Disproportionality

Minneapolis Public Schools Student Demographics



38.3%	White
29.3%	Black/African American
17%	Latino/Hispanic
4%	Asian
4%	American/ Native American

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By the Numbers

Setting 1 and 2 Resource Room Students: Highest LRE levels

Group	Actual Count	Expected %	Expected Count	Difference
Black/African American	1,168	29.3%	1,092	**+76**
White	1,110	38.3%	1,419	**–309**

District/Level	% in LRE 1 & 2
National Average	**65.2%**
State Average (MN)	**62.5%**
Minneapolis (MPS)	**45.7%**

Total Students in LRE 1 & 2: 3,640

These are students in the **least restrictive environments (LRE) (Settings 1 and 2)**.

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By the Numbers

Setting 3: Lowest level of LRE

Group	Actual Count	Expected %	Expected Count	Difference
Black/African American	552	29.3%	320	**+232**
White	177	38.3%	416	**–239**

Total Students in LRE 3 (Most Restrictive Setting): 1,068

Black students are 3x more likely than White students to be placed in the most restrictive setting (LRE 3).

By the Numbers

Setting 3: Lowest level of LRE – DCD Program Breakdown

Group	Actual Count	Expected %	Expected Count	Difference
Black/African American	157	29.3%	88	**+69**
White	35	38.3%	106	**–71**

Total Students with DCD in Setting 3: 288

Black students are 4x more likely than White students to be placed in the most restrictive setting (LRE 3) for DCD programming.

Improving Multitiered System of Supports (MTSS) and Teaching and Learning for Students with Disabilities

for the Minneapolis Public Schools

by the Council of the Great City Schools

Winter 2025

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ACKNOWLEDGEMENTS

The Council of the Great City Schools (CGCS or Council) thanks the many individuals who contributed to this review of the Minneapolis Public Schools (MPS). Their efforts were critical to our ability to present our report and recommendations for improving outcomes for all students, and especially for students with disabilities (SwD) and their receipt of high-quality special education and related services.

First, we thank MPS's superintendent, Dr. Lisa Sayles-Adams. It is not easy to ask one's colleagues for the kind of reviews CGCS teams conduct. Although our reports are typically tough, they are each driven by a group of external experts and stakeholders who objectively review current practices to support opportunities for improvement. Dr. Sayles-Adams is congratulated for having the courage and openness to request this review.

Second, we thank Ryan Strack, Assistant to the Superintendent and Board and the many MPS staff members who contributed to this effort. Their efforts helped to organize interviews and facilitate our receipt of requested detailed data and documents. The time and effort required to organize a review such as this are extraordinary, and their work is much appreciated.

Third, the Council thanks the many individuals who met with us, including district office and regional superintendents, principals, general and special educators, assistants, related services personnel, parents, and other stakeholders. All work passionately to support SwDs and strive to provide them with the instruction and services they need to learn. Staff members with whom we met reflected dedication to their students and expressed a strong desire to improve their achievement and social-emotional well-being.

Finally, I thank Nicole Mancini, Ed.D., CGCS's chief academic officer, who facilitated the Strategic Support Team's work prior to, during, and after their onsite visit. Also, thanks to team members Nathalie M. Nérée, Ph.D., the School District of Philadelphia's Chief of Special Education and Diverse Learners, and Julia Peyton, Ph.D., educational consultant. I also thank team member Sue Gamm, a nationally recognized special education expert and a long-time Council consultant who worked diligently to prepare the final report. As always, their work was outstanding and critical to the success of this effort. Finally, the Council's Alka Pateriya (strategy and partnerships director) and Delisa Nunez (partnership specialist) helped with numerous operational aspects of this review.

Thank you.

Dr. Ray Hart
Executive Director
Council of the Great City Schools

PURPOSE AND ORIGIN OF THE PROJECT, AND CGCS APPROACH

Dr. Lisa Sayles-Adams, MPS's superintendent, asked the Council of the Great City Schools (CGCS or Council) to review the district's instruction, services, and support for students with disabilities (SwD). In part, the superintendent's request was based on the results of her extensive 100-day listening tour and desire to learn more about special education issues that surfaced. This included how staff members can work together for common goals and make MPS the number one choice for parents. MPS leadership shared their strong desire to improve outcomes for SwDs and all students generally. This report and its recommendations strive to help MPS achieve this goal and maximize its capacity to educate all students effectively.

CGCS is the nation's primary coalition of large urban public-school systems and has conducted some 350 organizational, instructional, student services focusing on special education, English learner instruction, management, and operational reviews for more than 60 big city school systems over the last 25 years. For special education alone, CGCS has conducted 37 reviews with reports that have identified best practices and opportunities for improvement associated with substantive recommendations.

Our reviews are informed by team members' lessons learned over many years about why and how major urban school systems improve (and others do not), and other organizations' research on elements of school improvement and how they differ in places showing little academic gain over the years. The team's analysis of MPS and other publicly reported data is used to help understand the relationship between district practices and results that have or have not been achieved. Finally, our interviews of relevant district office, school-based personnel, and other stakeholders allow us to gather first-hand feedback on practices.

The CGCS technical assistance approach to urban school districts that relies on current and former senior managers from other urban school systems is unique to the Council and its members. The organization finds it to be an effective approach for several reasons.

- First, it allows the superintendent and staff members to work with a diverse set of talented, successful practitioners from around the country. The teams provide a pool of expertise that superintendents and staff can call on for advice as they implement the recommendations, face new challenges, and develop alternative solutions.
- Second, recommendations from urban school peers have power because the individuals who develop them have faced many of the same challenges encountered by those requesting the review. No one can say these individuals do not know what working in an urban school system is like or that their proposals have not been tested under the most rigorous conditions.
- Third, using senior urban school managers from other urban school communities is less expensive than retaining large management consulting firms that may have little to no programmatic experience. The learning curve is rapid, and it would be difficult for any school system to buy on the open market the level of expertise offered by the Council's teams.

Contextual Background, Methodology, and Report Organization

Dr. Lisa Sayles-Adams has been the Minneapolis Public Schools (MPS) Superintendent since February 5, 2024. Interim Superintendent Rochelle Cox (who formerly led the department of special education and health services) led the district from the beginning of the 2022-23 school year until Dr. Sayles-Adams' appointment.

According to the MPS website, Superintendent Sayles-Adams published a summary of her 100 Day Entry Plan Listening and Learning experience, which was based on 51 school and 2 contractual alternative site visits, internal and external stakeholder meetings and events, 7 community listening sessions, and a survey with 2,660 responses from nearly 1,500 participants (which was disproportionately 71 percent White). In part relevant to this report, concerns included escalated student behaviors that occur without appropriate staff and procedures to effectively address them. Finally, respondents expressed a desire to see increased support of site-based staff, including a particular focus on the recruitment and retention of diverse, high-quality teachers and education support professionals (ESPs), staffing stability, and equity across the district.

Based on Oct. 1, 2024 MPS data, the district enrolled 30,480 students, which is about 15,776 students less than during the 2001-02 school year. Overall, 85 percent of all students are White (36%), Black (26%) or Hispanic (23%). The remaining students are Multiracial (7%), American Indian (4%), Asian (3%), or Hawaiian/Pacific Islander (0.06%). Of all enrolled students, about 19.8 percent are students with disabilities (SwD).[1] Also, 8,482 students (27.8%) are English language learners (ELL) and 1,019 of ELL students (12%) have a disability.

MPS has 77 schools, with 42 elementary (including 26 schools with early childhood education and 1 on-line school), 11 middle schools, 12 high schools, and 13 various types of transition schools. Fourteen magnet schools have pathways for the arts, global studies and humanities, Montessori, Spanish dual language, and STEM/STEAM.

Regarding the enrollment declines over the past two decades, a recent news story explained that the state's open enrollment policy, which allows students to attend schools outside of MPS, has played a role, and a greater factor is related to fewer school-aged children living in the city. According to a Minneapolis Policy Briefing, 2027 enrollment is projected to drop to about 23,000 students for two reasons:

- **Charter Schools/Open Enrollment.** About a fifth of students who would otherwise be enrolled in MPS now attend a charter school or a school outside the city due to open enrollment, which comprises about 19,000 students (about 35% of the city's enrollment).

[1] In this report, students with disabilities (SwD) are those who have an individualized education plan (IEP) and receive special education services. They are also referred to as students with IEPs.

Currently, the 30 charter schools in Minneapolis operate independently of MPS.

- **Fewer Children Living in Minneapolis.** The number of children aged 5 and under living in Minneapolis fell by 17 percent between 2020 and 2021, and the number of children aged 6-15 years of age fell by 6.4%. More recent December 13, 2024, data reported that between 2023 and 2024 the number of Minneapolis school-aged residents increased (by 2.7 %) while enrollment increased by a smaller rate (1.5%).

According to an August 28, 2023, newspaper article, MPS's May 12, 2020, Comprehensive District Design (CDD) has also contributed to MPS's decreased enrollment. According to this report, more than 4,200 (about 13%) students left MPS in the two years since the CDD's enactment at the beginning of the 2020-21 school year. The most visible changes occurred in 2021-2022 when students, staff and programs were reassigned across district buildings. It is important to note that soon after the board's May 2020 approval of the CDD, George Floyd's murder on May 25, 2020, and Covid school closures beginning March 18, 2020, through April 12, 2021, occurred during this time. Although the CDD school, program, student, and staff changes were significant, interviewees did not mention any effects. However, Dr. Sayles-Adams noted in her 100-day plan report that, based on seven community listening sessions and an online survey, the CDD's lack of school choice flexibility remains a concern. "This was especially true for parents and guardians whose community school is no longer the closest location to their house."

As with most other urban school districts across the country, MPS has significant fiscal issues. District expenses increased (by 20% since 2020) while enrollment declined (by 13%). In December 2024 the MPS board of education voted to approve a nearly 13 percent property tax levy increase. The increase reflects the November 2024 voter approved operating capital levy for a total of $279 million (a 12.6% increase from 2024-25).

Methodology

The Strategic Support Team (SST) conducted onsite interviews on December 9–12, 2024 and eight remote interviews after our visit. Together, we conducted 47 sessions, which included approximately 140 individuals representing MPS's district office and school-based personnel, parents, and board members. We reviewed a voluminous amount of data, written information, and documents in response to our initial and supplemental requests. In addition, we reviewed publicly available data from the Minnesota Department of Education (MDE) and U.S. Department of Education (ED). We triangulated this qualitative and quantitative information to inform our findings and recommendations. Our report does not reference or quote any individuals, although it references school district position titles when necessary for contextual purposes. The highlight of our review was the active and informative participation by focus group attendees. Staff were eager to communicate their work and shared concerns with a true desire for improvement.

Members of the Strategic Support Team (SST) for this project are named below.

Nicole M. Mancini, Ed.D. Chief of Academics The Council of the Great City Schools	**Sue Gamm, JD.** Former Chief Specialized Services Officer, Chicago Public Schools; CGCS Consultant
Nathalie M. Nérée, Ph.D. Chief of Special Education and Diverse Learners The School District of Philadelphia	**Denise M. Walston** Chief of Curriculum The Council of the Great City Schools
Julia Peyton, Ph.D. CGCS Educational Consultant	

It is important for readers of this report to understand that our gathering of qualitative and quantitative information did not meet state and federal compliance monitoring standards with which several team members have extensive expertise. Rather, the information enabled us to use our collective knowledge and experience to share with MPS recommendations for consideration.

Report Organization

Following an Executive Summary, our report presents detailed data and information focusing on MPS processes and practices that support teaching and learning for all students, especially for SwDs. These are organized by the following seven broad areas, with recommendations for each –

I. MTSS to Accelerate Student Achievement and Wellbeing
II. Disability Demographics and Eligibility
III. Data Impacting SwD Achievement
IV. Support for SwD Achievement and Wellbeing
V. Administrative and Operational Support for SwD Teaching and Learning
VI. Special Education Compliance and Operations
VII. Shared Accountability for Results

The majority of recommendations are organized by similar functions: personnel alignment, implementation plan, data review, written expectations, mapping resources and filling gaps, differentiated professional development (PD), data analysis and reporting, and monitoring and accountability. A matrix follows the report that presents each recommendation by these functions.

Finally, appendices contain the following –

- Appendix A lists Percent SwDs & FTE Staff to SwD Ratios in Ascending Order by Group.
- Appendix B lists data and documents the SST requested and reviewed.
- Appendix C lists the SST's on-site agendas and follow-up interviews

- Appendix D presents SST members and their backgrounds.
- Appendix E describes information about the Council and History of SST reviews.

EXECUTIVE SUMMARY

An executive summary of this report follows, and a matrix at the end of this summary shows how these recommendations intersect with common functions: personnel alignment, implementation plan, data review, written expectations, mapping resources and fill gaps, differentiated professional development (PD), data analysis and reporting, and monitoring and accountability. See the SST's full report for detailed information associated with the summary below.

I. MTSS to Accelerate Student Achievement And Wellbeing

School districts have historically requested a Council SST to review administrative and school support for SwD's teaching and learning. However, for most students this support must begin prior to their qualification for special education. The strength of a district's Multi-Tiered System of Supports (MTSS) framework implementation influences the achievement of all students and their referral for special education. As a result, our reviews begin with an assessment of school districts' MTSS framework and implementation.

Achievement, Graduation, and Suspension Data. MPS rates have been below state averages for reading, math, and graduation. In 2024, MPS reading proficiency rates decreased to 40.1% (a 7-percentage point drop from 2021), with MDE's rate at 45.5%. Math proficiency also showed a decline, with MPS at 34.7% (10.8 percentage points below the state rate). The high school graduation rate in 2023 was 67.8%, 7.5 percentage points behind 2019 and 15.5 percentage points behind the state rate. Also, while overall out-of-school suspension (OSS) rates were relatively low, they were higher for middle school grades and for Black students: those without disabilities were 23.3 times more likely than non-Black peers to receive an OSS for one or more days and 71.2 times more likely for over 10 days. The risk ratio for American Indian students without disabilities was high also at 8.5. (Risk ratios for SwDs, which are not as high, are reported further below.)

MTSS Framework. MPS is committed to MTSS, as outlined in Board Policy 6121, "to adopt a system of supports, interventions and trauma-based care to address academic, social, emotional, and behavioral needs of students who are at risk of not meeting state proficiency standards." MPS developed a 2024-25 Literacy and Math Multi-layered Practices Guide to support MTSS across these areas. However, challenges remain to fully implement MTSS across schools. Interviewee feedback revealed fragmented implementation, lack of clear leadership, and concerns over inadequate interventions and PD.

Reading Instruction. The Minnesota READ Act requires PD for all personnel involved in reading instruction. While MPS is focused on improving reading instruction through research-based materials, interviewees noted challenges given the district's limited resources.

Math Instruction. MPS initiated revisions to its curriculum, with PD for general and special educators and use of various standard core instructional programs and supplementary interventions. Several concerns relate to math guidance and iReady's effectiveness as a core instructional tool.

English Learner Instruction. MPS serves approximately 2,500 new students, many receiving English language development (ELD) support. With over 200 ELL teachers, the district has made strides in bilingual and dual-language education. However, some logistical and staffing issues, such as teachers leaving or position reductions, affect the delivery of consistent instruction.

Behavior and Social-Emotional Wellness. MPS's prior support for positive behavior has faltered with less collaboration across departments and PD. The draft SEL and Behavior Multi-layered Practices Guidance (2024-25) has limited information for students with challenging behavior.

Professional Development (PD). PD across MPS is challenging due to limited time and competing priorities. There is a need for more integrated, cross-departmental activity to fully take advantage of district office expertise. Attendance is also a concern, with staff members not attending required sessions.

Data Reporting. MPS utilizes the eduClimber platform to visualize academic, behavioral, and attendance data, but issues with data integration and leadership support persist. While MPS is data-rich, it lacks unified data systems and consistent accountability for data integrity.

Recommendation 1. Actualize MPS's Board Policy 6121 to "adopt a system of supports, interventions and trauma-based care to address academic, social, emotional, and behavioral needs of students who are at risk of not meeting state proficiency standards."

To transform MPS's Board Policy into practice expedite completion of a comprehensive MTSS framework and guide that fully incorporates all elements of the board policy. To carry out Recommendation 1, multiple actions at the district level must occur and involve all personnel involved with teaching and learning at the district, associate superintendent, and school levels carrying out their respective responsibilities. *This work must reflect a sense of urgency among all stakeholders to improve all achievement for every student.*

a. Personnel Alignment to Support MTSS. 1) To optimize support for schools, enhance communication, collaboration, and personnel alignment. 2) Have the deputy superintendent assume a broader role with direct reporting from the senior academic officer (SAO). 3) Repurpose an existing position or upgrade the current MTSS position to director with direct reporting to the deputy superintendent to lead districtwide MTSS framework development, planning, and monitoring. 4) Have the MTSS director coordinate efforts across all departments to help align all necessary personnel and resources to support positive behavior, social-emotional learning (SEL), mental health, physical health, and foster strong partnerships between academic departments, student services, and equity and culture.

b. MTSS Leadership Teams. 1) Establish a district MTSS leadership team, directed by the deputy superintendent and involve representatives of all departments and offices supporting teaching and learning, including behavior and SEL support. 2) Establish associate superintendent leadership teams for their school portfolios, including representatives from schools and district office staff who support schools to collectively review school data, plan support, and provide PD for principals and schools with common needs, etc. 3) Have each MPS department or office identify individuals for this purpose to assist each associate superintendent.

c. Data Review. Review achievement and graduation data, including but not limited to data reported in this report. For example, review data for students with and without IEPs who based on screening data are at high risk of not meeting MCA standards. Consider how these students overlap and have similar instructional needs. Use this information to inform planning.

e. Implementation Plan. Have the MTSS leadership team oversee drafting an MTSS implementation plan. With the MTSS director facilitating the planning process, involve individuals across district offices and obtain feedback from stakeholders. 1) Have the plan ready for a 2025-26 school year launch, with a kickoff event to celebrate and share details with stakeholders. (A short-term consultant could assist with this process.) 2) Post the plan online for public access. 3) As the plan is implemented, obtain actionable feedback from stakeholders to drive MTSS refinement and success.

The full SST report specifies 13 areas to include in planning, such as: 1) creating an MPS instructional vision; strategies for providing school personnel sufficient support for reading and math core instruction, tiered interventions, positive behavior support, and SEL; 2) developing a family-friendly version of the MTSS implementation plan translated into the district's most common languages; 3) identifying funding barriers that may be addressed through braided funding; and 4) improving planning addressed throughout all of these recommendations including the functions reflected below.

f. Written Guidance and Expectations. Upon completion of the comprehensive MTSS guide, prominently post it on the district's website, updating it as needed to address issues and questions. Have the guide inform PD, and clarify expectations for district leadership, associate superintendents, and school staff. The SST report specifies seven areas for written guidance and expectations, including those applicable to SwDs and specially designed instruction (SDI), and embedding MTSS principles in the MPS Strategic Plan.

g. Mapping Material and Human Resources. Review currently available MTSS related materials and human resources for areas such as literacy, mathematics, behavior, and SEL. Identify gaps and replace ineffective materials with those found to be research-based and more effective based on evidence. This review should ensure that schools receive the necessary human resources they need to enhance their practices.

h. Differentiated PD. Ensure all district and school-based personnel having direct and indirect support for teaching and learning receive information they need to implement written guidance and expectations, and associated evidence-based practices. Differentiate PD based on participant

needs and skill levels. To address MPS's competing priorities for PD time and for out-of-school time consider the use of PLC time during the day, stipends, substitute coverage, etc. The report lists six suggestions for PD implementation that cross all recommendations.

i. Data Analysis and Reports. Form a team to improve data collection and reporting by overseeing its integration, intervention tracking, and training for MPS's data and progress monitoring platforms. 1) Include members from information technology and content users (academics, special education, EL, student support services, etc.) for holistic planning and to optimize data system usage.

The SST report lists seven areas for suggested work, e.g., eliminating redundancy through increased data migration; data associated with schools contributing to disproportionate suspensions of American Indian and/or Black students with and without IEPs; etc. Share summary reports with pertinent district administrators, associate superintendents, and principals.

j. Monitoring and Accountability. Create clear accountability expectations for monitoring MTSS implementation. Establish key performance indicators (KPIs) to assess progress at district, associate superintendent portfolios, and school levels. Have tiered monitoring for schools needing more support, using such factors like achievement levels, special education noncompliance, staffing shortages, etc. Use feedback loops involving school personnel, district leadership, and families for continuous improvement.

II. Disability Demographics and Eligibility

MPS's implementation of MTSS directly impacts special education qualification. For example, the district's SwD rate (18.2%) is higher than state and national averages. (See Exhibit 2a.) Interviewees revealed concerns about the consistency and effectiveness of special education evaluation processes, as well as confusion surrounding parent-initiated evaluation requests. MPS uses a three-pronged approach for ensuring appropriate referrals: anti-racism training, MTSS related data, and exclusionary factor consideration. Special education procedural documents shared with the SST lack organization, making it difficult to access necessary information effectively. (A referenced "Due Process Notebook" was passcode protected and inaccessible.)

- **Special Education Disability Data.** MPS rates range by various factors, such as disability area, grade, etc. (See Exhibits 2a-g.) Disparities were greatest when sorted by race, ethnicity, and gender. The risk ratio measure used for this purpose shows the likelihood that one student group is more likely than all others to have a specified characteristic. A risk ratio of "1" shows proportionate results. The Minnesota Department of Education (MDE) uses a figure of "3" (along with other criteria) to signal significant disproportionality. We believe data showing a group is twice (risk ration of 2 or higher) as likely as others to have a characteristic becomes concerning.

- **Black SwDs.** Concerning disability area risk ratios were for: DCD/MM (3.2); SMI (3.5); DCD/SP (4.2); and EBD (2.5).[2]
- **American Indian SwDs.** Concerning risk ratios were for EBD (3.8) and SNAP (3.1).

When compared to females, males were more likely to have certain disabilities. (See Exhibit 2i.) Also, Black male SwDs compared to not Black male SwD had high risk ratios for DCD/MM (4.05), DCD/SP (3.50), and SMI (3.97).

- **English Learners with Disabilities (ELwD).** EL students comprised 28 percent of all MPS students. ELwD comprised a much smaller composition of all EL students (12%) and of all SwDs (17%), but they had a 3.17 risk ratio for DCD/SP.
- **Section 504 Qualification.** A small percentage (1.6%) of MPS students are qualified under Section 504 of the Rehabilitation Act. The rate was higher at various grades, e.g., eight percent (10th grade) and nine percent (11th grade). Smaller rates applied to health plans, which may reflect students who could be reviewed for Section 504 qualification.

Recommendation 2. Improve special education referral, evaluation, & eligibility practices.

Data showing several variances between district, state, and national rates, as well as written information and interviewee feedback suggest actions to improve associated practices. This recommendation aims to enhance special education and Section 504 structures, processes, and support systems for students to receive the instruction and services they need to thrive.

a. Personnel Alignment. Consider a unified organizational structure (*Specialized Support,* title for description only) to oversee all aspects of state and federal responsibilities for special education and Section 504. Establish a new *Specialized Support* leadership position [reporting to the senior academic officer (SAO)] to lead with one direct report to oversee special education; and a second report to oversee personnel (meeting IDEA related services criteria) who would support both students with and without IEPs. For additional information see Section IV. Support for SwD Achievement, Behavior, Social-Emotional Wellbeing, Recommendation 4.

b. Data Review. Regularly review and analyze data related to special education and related services with representatives from associate superintendents (one or two), academics, student group offices, special education, ELL, student support services, etc. Focus on identifying root causes for any concerning data trends, such as unusual grade patterns, high ASD rates, etc. Have the committee share regular data reports and findings with district leadership and school staff for further analysis and follow-up.

c. Implementation Plan. Include in MPS's implementation plan actions to address root causes for concerning disparate special education evaluation referral and eligibility data. Involve associated

[2] Abbreviations: developmental cognitive disability (DCD); mild moderate (MM); severe/profound (S/P); and severely multiple impairment (SMI); emotional/behavior disability (EBD); severe learning disability (SLD); and SNAP (a component of SLD).

experts and representative school-based staff members with implementation roles. 1) Consider relationships between inadequate MTSS implementation, associated special education referrals, and/or SLD qualification. 2) Critically review MPS's current social worker and nurse practice to assess most students undergoing a special education evaluation, which exceeds the federal and state rule for "appropriate" assessments related to the "suspected" disability. 3) With representative feedback, assess this practice's "return on investment" against having more time for service provision. 4) For students with health plans, annually consider their possible Section 504 qualification.

d. Written Guidance and Information. Develop a comprehensive, user-friendly *Specialized Support* manual to provide guidance for special education, related services, and Section 504 procedures and practices. 1) Align processes with any federal and state requirements for e.g., associated MTSS guidance, responses to parent requests for evaluations, evaluation and eligibility protocol (including for ELL students), etc. 2) Consider a family friendly version of the manual, translated into most common languages. 3) Post the manual(s) on MPS's website and make links public for transparent and increased access.

e. Differentiated PD. Focus on the *Specialized Support* manual's use as a daily resource, e.g., how to find various topics as needed. Also address new information and commonly misunderstood and misapplied areas. Use feedback to schedule future sessions focused on common areas of need.

f. Data Analysis and Reporting. Track and share disability data across district offices supporting teaching and learning, associate superintendent portfolio schools, and individual schools. Use data checks at these levels to address concerns, receive feedback, and inform follow up actions.

g. Monitoring and Accountability. Establish clear expectations and relevant KPIs to monitor implementation of expected practices at district, associate superintendent, and school levels.

III. Data Impacting SWD Achievement

This section reports various SwD rates related to statewide assessments, graduation and dropout data, and other areas associated with achievement such as postsecondary school outcomes; suspensions; unexcused absenteeism; and educational placements. The text notes MPS data included in the federally required Minnesota State Performance Plan (SPP).

Outcomes for SwDs Aged 3 to 5 Years. For children aged 3 to 5, the SPP tracks three areas: behavior, knowledge and skills, and social-emotional skills. MPS exceeded SPP state targets in some categories but fell short in others. Notably, MPS exceeded targets in behavior (63.3%) and knowledge and skills (67.8%) but lagged in social-emotional skills (59.9%). Early success in these areas prepares children for subsequent kindergarten success. (See Exhibits 3a-b.)

MPS Academic Achievement Outcomes for School-Aged SwDs. SwD participation in statewide assessments is critical for assessing their academic achievement. MPS participation rates in reading and math statewide assessments were below federal requirements (95%). Tenth grade participation, particularly in reading (41%) and math (28%), was notably low. (See Exhibits 3c and

3g.)

Reading. Proficient or above SPP reading rates for 2022-23 were significantly below state targets, with the highest rate at fourth grade (12%), and lower than the state's rate (26%). Eighth grade proficiency rates were lower (5%) and tenth grade had too few participants to rate. From 2022 to 2024, the overall MPS proficiency increased (19.5% to 23.4%). The proficiency gap between students with and without IEPs varied by grade, with MPS meeting targets in fourth and eighth grades and exceeding the target in tenth grade. (See Exhibits 3d-f.)

Math. Math proficiency rates (2022-23) were significantly below state targets. The highest rate was for fourth grade (9.7%), which was much lower than the state rate (34.7%). Eighth grade was even lower (2.3%). At eleventh grade, too few students participated to report results. From 2022 to 2024, MPS reported an overall proficiency increase (15.4% to 20.1%). MPS met the proficiency gap targets in all grades, with figures improving across fourth, eighth, and tenth grades. (See Exhibits 3h-j.)

Alternate Assessment. MPS results showed (2022 to 2024) that students' participation in the statewide alternate assessment exceeded the federal statewide cap of 1 percent (1.43% to 1.68%). Reading proficiency rates fell below state targets at fourth grade (48%), eight grade (60%), and tenth grade (5%). In math, MPS's fourth grade rate (63%) met the target but decreased at eighth grade (48%) and eleventh grade (10%), all below state minimum targets. MDE rates were higher, with percentage points ranging from 6 (fourth grade) to 36 (eleventh grade). (See Exhibits 3k-m.)

Graduation and Dropout Rates. The district's SPP graduation rate (52%) was significantly lower than the state's (90%) and below the minimum SPP target (87%). MPS data illustrated racial disparities were evident, with the lowest graduation rate for American Indian students (25%). The district's SPP dropout rate (9.95%) was slightly higher than the state's maximum target (9.4%). MPS's reported American Indian SwD rate was higher than all other SwD groups (19.4%). (See Exhibits 3n-o.)

Postsecondary School Outcomes. The one-year post graduation rate of former MPS SwDs who enrolled in higher education (31%) exceeded the SPP target. However, lower cumulative rates applied to competitive employment (47%) and engaged in education and training (61%), both below state targets. (See Exhibits 3p.)

OSSs and ISSs. Suspension data (2020-21) revealed concerning patterns for Black students. Highest risk ratios applied to Black students without IEPs for one or more days (3.73) and for over 10 days (15.02). The American Indian student risk ratio for students without IEPs was also high at 4.25. For ISSs of 1-10 days, the risk ratio for Black students without IEPs was higher (19.7) than for Black SwDs (2.27). OSSs rates for SwDs increased significantly in sixth through eighth grades, and ISSs increased at sixth and seventh grades. (See Exhibits 3s and 3u) Implementation of robust MTSS activities to support positive behavior would positively impact these outcomes.

Unexcused Absenteeism. Rates were higher for SwDs compared to their peers. MPS reported significant absenteeism that increased from sixth grade to twelfth grade and was especially

prevalent in high school. Black and American Indian SwDs faced the highest absenteeism risk for 31 or more days. (See Exhibits 3v -x.)

Young Children Placement Rates. For children 3 to 5 years of age, district SPP data showed a regular class rate (42.3%) lower than the state (54.8%) and separate class rate (33.8%) higher than the state (20.7%). Both MPS rates failed to meet state targets. (See Exhibit 3y-z.)

Students 5 through 21 Years of Age Placement Rates. Federal and state reporting categories reflect percentages of time SwDs receive instruction in general education classrooms and in separate schools. MPS's rate for students spending at least 80% of their time in regular classes (47.9%) was lower than the state (62.8%) and national averages (69%), while MPS's separate school rate (4.0%) was slightly higher than state (3.7%) and national (2.6%) rates. (See Exhibits 3aa-ff, which include rates by disability area, and disability area race/ethnicity risk ratios at Exhibit 3gg.)

Separate Schools. Two MPS centers educate only SwDs. The school rates [River Bend (66%) and Harrison (70%)] were much higher than MPS's overall rates for Black SwDs (38%) and all Black students (35%). Black risk ratios for River Bend were: 6.5 for all students; 4.9 for EBD; and 3.9 for ASD. For Harrison they were 5.4 for all students; 2.6 for ASD; and 2.5 for EBD. (See Exhibit 3hh.)

Recommendation 3. Benchmark, track, and use associated achievement data to inform actions to improve SwDs' academic, behavior, social-emotional outcomes.

SwD's very low achievement and associated rates, and disproportionately high rates (especially for Black SwDs) for OSSs and ISSs, absenteeism, and restrictive educational environments require a spotlight on these data to monitor progress and take follow-up action.

a. Data Review. Review achievement associated data to identify areas for improvement. In addition to reviewing graduation and dropout rates (Exhibits 3n-o) and education, training, and employment outcomes one year after SwDs leave high school (Exhibit 3 p) consider –

- SwD **participation rates** that are MCA low and MCAT high, and low SwD **achievement rates** for 3- to 5-year-old children and school aged students. (Exhibits 3a-m.)
- Overall **suspension disparities** for students with and without IEPs and by race/ethnicity. (Exhibits 3q-u.)
- SwDs **absent** for large number of days, with attention to disparate rates for Black and American Indian students.
- Young children spending **less time in general education classrooms** with MPS rates lower than state and national rates. (Exhibit 3y).
- **More restrictive educational placement** rates for MPS than state and national rates. (Exhibits 3aa-gg). Especially note highly disproportionate rates for Black students and for compositions by grade. (Exhibit 3ff-gg)

b. Implementation Plan. Target actions to address identified disparities and improve SwD outcomes. The report identifies eight areas for planning. These also include various resources for this purpose.

c. Written Guidance and Information. Include in the *Specialized Support* Manual information regarding chronic absenteeism and protocols to guide IEP team decision-making for students educated in more restrictive environments.

d. Differentiated PD. Provide PD for staff members to carry out this recommendation.

e. Data Analysis and Reporting. Supplement current reporting with data areas reported in this section.

f. Monitoring and Accountability. Supplement KPIs with additional indicators to monitor and address Recommendation 3 actions.

IV. Support for SwD Achievement, Behavior, and Social-Emotional Wellbeing

MPS personnel support SwDs by taking positive actions such as those described below. Also, described are areas offering opportunities for improvement.

Educating Young Children with Disabilities. MPS offers early intervention services from birth through 2 years of age. For 3–5-year-olds, MPS's relatively small enrollment of children without IEPs restricts inclusive education opportunities for SwDs.

Regular Classroom Core Instruction and Supplementary SDI. To improve SwD achievement there is a need for improved Tier I core instruction with supplemental Tier II and Tier III interventions (as appropriate) by general educators, interventionists, and specially designed instruction (SDI) by special educators. Also, educators need assistance to appropriately instruct their students who have large achievement level ranges.

Specialized Programs are each intended to tailor instruction for their enrolled SwDs. Too often academic core instruction is not aligned with grade level curricular standards for students taking regular state assessments and there are concerns about sufficient behavioral support. Some schools with unique models for using specialized program staff ratios to support students in regular classrooms faced resistance from special education administration. These programs would benefit from high quality indicators and monitoring associated with technical assistance and support as needed. Three of these programs have disability names (ASD, DCD, and EBD) which are not student and family friendly and potentially limit consideration for some students. Special educators have various instructional materials for students with significant cognitive disabilities, but training is limited. Also, the Universal Sensory Room standardization project needs to be monitored for consistent implementation across schools.

Special Education Centers. The relatively recent transition of students from River Bend to Harrison HS is considered successful, despite staffing challenges. Metro Educational Services' half day K-8 SwD academic program supplements Catholic Charities' Day treatment. There is a desire to expand the program to include high school instruction.

Support for Students with Challenging Behavior. Behavioral challenges among SwDs, particularly Black students, have led to disproportionately higher suspensions. MPS has various documents and protocols for supporting behavior; however, insufficient coordination among all MPS personnel with associated expertise, relatively few behavior specialists, and needed PD limit effective implementation.

English Learners with Disabilities (ELwD) are 3.17 times more likely than non-EL SwDs to receive education in a specialized DCD severe and profound program. While a dual-eligible collaboration tool and a new multilingual position are helpful, dual language programs have waitlists.

Special Education Placement. New and transferring students (including SwDs) visit MPS's placement center and then go to schools to complete enrollment. Delays have occurred for students with obvious needs but who lack disability documentation, e.g., evaluation reports, IEPs, etc., and/or who need a wheelchair. MPS's process for students transitioning between resource and specialized programs require collaboration between schools; but the administrative review process does not appear to have associated timeframes, potentially delaying decision-making. Also, it is perceived that students remain in Level III specialized program settings once placed. Improved proactive supports could reduce MPS's more restrictive Level III and special school (Level IV) rates, which are higher than state and national averages.

Assistive Technology (AT) Center personnel evaluate AT needs and facilitates devices for SwDs. Information shared from 2018 was outdated, and volunteers were reported to provide valued assistance. The Center has used an expert volunteer base for quite some time.

Secondary Transition Services and Support. The Transition Plus program offers work experiences for students aged 18-22; however, there is desire to increase the program's access. Students with severe disabilities often attend day programs that lack community work experiences.

Written Information. MPS has various documents reflecting core-aligned instruction and inclusive education initiatives. Noted gaps include addressing consistent SDI usage across schools, coordination of specialized programs, and monitoring student progress. Specialized intervention programs were reported, but questions applied to their consistent use and application across the district. Also, limited guidance was available to inform general educators' core instruction and tiered interventions for SwDs and interaction and coordination with special educators' supplemental SDI.

PD. Various opportunities exist for MPS personnel, but there is need for more targeted PD for general and special educators, special education assistants (SEAs) and special educators with nontraditional pathway certificates. A special education department PD planning committee gathers feedback from spring surveys to adjust content. Various initiatives are intended to make PD accessible, but most non-READ Act associated PD is: voluntary; limited for substitute funding; outside school time; and insufficient to track data for achievement and behavior.

Family Engagement. MPS's SPP rate (77%) for involving parents of SwDs in their children's education exceeds the target's minimum rate (71.5%). The Special Education Advisory Council (SEAC) faces low engagement despite various proactive initiatives. There is a desire to reinstitute

robo calls to inform parents about these meetings. Parents raised concerns about undue focus on children's deficits during IEP meetings and confusion about transitions from IEPs to 504 plans.

Recommendation 4. Accelerate SwD's achievement with improved instruction, behavioral, and social-emotional supports to accelerate learning.

Low achievement outcomes for the district's SwDs require a reassessment of how district office staff are organized to collaborate and leverage their collective resources, and a commitment to act and support general and special educators to better enable SwDs to learn from their instruction.

a. Personnel Alignment. As addressed in Recommendation 2a related to a new *Specialized Support* structure, unify administrative oversight for special education and a *Supportive Learning* unit (for descriptive terms) for personnel providing social-emotional wellness, physical, behavioral, and Section 504 support. Empower *Supportive Learning* personnel to support students with and without IEPs, using blending and braiding funding as needed.

b. Data Review. Using the representative group referenced in Recommendation 2a, review data related to SwD proficient screening rates that dropped from Fall to Spring 2023-24; schools with specialized program classrooms showing no, few, or many classrooms; and demographics for SwD only special schools, particularly disproportionately high Black student rates. (Exhibits 4a-d).

c. Implementation Plan. Based on the data review described above, and other information, include in MPS's implementation plan actions, including those needed to address root causes of SwD outcome disparities. A set of 17 areas address planning needs. These include but are not limited to: 1) increased access to early education along with evidence-based instructional materials; 2) improved placement center enrollment processes (especially timely education access for students with obvious needs who lack necessary documentation); 3) accelerated high quality instruction for SwDs educated most of their time in regular classrooms, along with supplemented SDI; 4) increased integrated opportunities and high quality instruction indicators for students educated in specialized program; 5) more equitable school distribution of specialized programs; 6) protocol for more restrictive placements; assistance needs for MPS's two special schools (River Bend and Harrison); 7) broader administrative positive behavior support; and increased SEAC support, e.g., seeking greater nonprofit community involvement to expand family support and training, etc.

d. Written Guidance and Information. Include in the *Specialized Support* manual information needed to understand areas related to this recommendation, such as: 1) broad publication of SwD options for early education; 2) aligned general education and SDI literacy and math instruction; 3) high quality indicators for each specialized program; 4) protocol for highly restrictive instruction with review time frames; 5) instructional models for ELwDs; to the

maximum extent possible post all information on MPS's website, including linked documents (not sensitive or confidential) to promote transparency.

e. Map Material and Human Resources, Analyze, and Fill Gaps. Address areas such as: 1) AT devices and support for students in specialized classes; 2) behavior specialists needed to perform expected activities; 3) personnel knowledgeable about EL and disability; and 4) work internships and community-based training for all SwDs who would benefit, including those with significant cognitive disabilities. (See, e.g., Work-Based Learning for Students with High Support Needs.)

f. Differentiated PD. Address such areas as: 1) core instruction for SwDs educated most of the time in regular classes, including UDL principles; 2) unified general and special educator PD upon receipt of new core instructional materials; 3) instruction for students with large achievement differences; 3) for special educator and SEAs specialized program instructional material training; 4) with SEA input, training relevant for students they support; 5) for general educators, special educators, and SEAs evidence-based positive behavior supports; and 6) update special education's 2023-24 PD Planning Document with more organized contents.

g. Data Analysis and Reporting. Show 1) by race/ethnicity and gender students educated in general education less than 40 percent of the time; 2) students educated in special schools; and 3) students with and without IEPs having race/ethnicity risk ratios higher than "2" for OSSs more than one day, and for more than 10 days.

h. Monitoring and Accountability. Embed in all walkthroughs, observations of core instruction for SwDs (and other low achieving students) and evidence-based supplemental SDI most likely to support learning. Also walk through specialized program classrooms and special school. Use high quality protocols to guide these observations.

V. Administrative and Operational Support for SWD Teaching and Learning

This section addresses administrative and operational supports that contribute to the improvement of teaching and learning for SwDs.

Interoffice Collaboration. There is a need to improve district office interaction to support school leadership and personnel and leverage collective resources for achievement and social-emotional wellbeing to benefit all students, including SwDs. This includes the need for better coordination among the academic offices and departments for student support services, equity, and climate, which have separate reporting lines.

Special Education Organization and Support to Schools. The special education department has three directors, with each supporting a set of associate superintendent portfolio schools and a set of districtwide responsibilities. These different functions are difficult to balance effectively.

School-Based Support for SwDs. The special education department has implemented several activities to support schools, including biweekly newsletters, quarterly data meetings, and opportunities for school-based personnel to request support. However, much information useful for community stakeholders (and the Council's SST for this report) are password-protected and

unavailable on the MPS website.

Full Time Equivalent (FTE) Specialized Personnel and Comparative Ratios. Data from 2020 to 2024 show MPS's FTEs increased for special educators (+72.6) and occupational therapists (+5.3), and decreased for social workers (-17.1), speech/language pathologists (-8.6), and nurses (-7.1). Over the past three years, data from the Minneapolis Department of Education reports that special education enrollment in the district has increased (5,065 in 2023; 5,428 in 2024; and 5,574 in 2025). Moreover, MPS personnel ratios are larger than most district averages, particularly for psychologists, special educators, speech/language pathologists, and OTs. (See Appendix A. Percent SwDs and FTE Staff to SwD Ratios in Ascending Order by Group.) **Note, these figures must be interpreted with caution due to differences in district reporting methods; they are not intended to prompt action without significant additional review. Enrollment changes for specific special education needs may vary resulting in changing needs across departments.**

Vacancy Rates. Vacancy rates for social workers (15%), nurses (15%), and speech/language pathologists (13%) are notably high compared to other personnel areas. (See Exhibit 5d.)

Interviewee Feedback highlights the following concerns pertaining to both the special education and student support services departments.

- **Frequent special education department personnel turnover** has contributed to diminished institutional knowledge and inconsistency in practices across schools. Also, the department has not identified sufficient experts with needed districtwide responsibilities, such as for SDI (literacy and math), for challenging behavior support, and for each specialized program. Department personnel do not consistently have awareness or understanding of personnel evaluation processes.
- **Special education department leadership** does not openly discuss challenges with district personnel, limiting the potential for improvements. Also, information flow to schools depends on each director's oversight, which has sometimes led to stakeholder confusion and frustration.
- **DPFs** do not consistently attend principal meetings and there is a need for greater school support. They perform varied duties across schools with inconsistent expectations, which requires clearer role definitions and written guidance. New DPFs have inconsistent training and increased workloads due to supporting alternate-certified educators.
- **Special educators** reported overwhelming due process requirements, increasing caseloads, insufficient time for lesson planning, and not enough time to participate in PD.
- **SEA** concerns were expressed about increasing responsibilities and insufficient training, especially for crisis management and behavior de-escalation. PD is desired for SEAs to better meet their students' needs. Some perceive denials of additional SEA requests have contributed to teacher burnout.
- **Social workers** perform multiple roles, with varying responsibilities depending on school assignment. Concerns were expressed about their major role in facilitating school-based due

process procedures, including acting as the district representative at IEP meetings.

- **Speech/Language Pathologists** face heavy paperwork challenges for initial evaluations.
- **Collaborative models** are difficult for OTs/PTs to establish with large regular classroom enrollments and unaccounted for travel time between schools impacts workload levels.
- **Several documents** detail special education personnel roles. However, there appears to be a disconnect between written information and actual practices, especially for school-based special education leads and for social worker IEP-required related services role.
- **Other concerns** included high caseload impact on MTSS participation, high costs associated with contracted services to cover vacant positions, and data inefficiencies.

Recommendation 5. Increase collaboration across district departments and offices to maximize collective resources.

MPS would benefit from an organizational structure that brings cohesion across the system to ensure collaboration and consistent messaging. Consider the following structure for this purpose.

a. Personnel Alignment. Make several organizational adjustments to optimize support for SwDs and all students to benefit from activities for positive behavior, physical and mental health, and social-emotional wellness. Several of these are prior recommendations for a comprehensive overview.

- Establish a **broader deputy superintendent (deputy) role** to oversee all personnel areas supporting teaching and learning to boost collaboration among all involved staff members.
- With **reporting to the deputy**, have the **SAO continue direct superintendent communication** (keeping the deputy informed) and continue other SAO leadership roles.
- Have the **MTSS director report to the deputy** for authority to align associated activities.
- Establish a ***Specialized Support* leader** to unify special education and support services for all students. Have direct reports for special education and for *Supportive Learning* for students with and without IEPs to oversee all areas associated with activities for positive behavior, physical and mental health, social-emotional learning, etc.
- **Restructure the special education department.** Have three directors continue to align with the associate superintendents and portfolio schools to support school-based activities. Have another director support districtwide activities and specialized programs to develop high quality program indicators and provide expert consultation with school-based directors and others. In our experience, this structure enables directors to focus either on school-based or on districtwide needs. The current function combination makes such foci difficult.

b. Implementation Plan. Include in MPS's plan actions to implement personnel alignment adjustments and to improve collaboration across district offices and schools. Areas of concern include: 1) funding challenges with use of blending/braided funding; 2) deputy leadership of district instructional leadership team; 3) associate superintendent meetings inclusion of

associated SDI information; 4) strategies to enhance information sharing and address communication challenges; 5) reliance on social workers for due process and their IEP-services role; and 6) as requested, help to school-based personnel to complete form for additional adult assistance.

c. Written Guidance and Information. Include in the *Specialized Services* manual guidance and information including: 1) DPF responsibilities; personnel evaluation process; 2) diversifying school-based due process leadership functions; 3) social worker IEP-related service provider role; 4) collaborative OT strategies; and 5) personnel evaluation process.

d. Differentiated PD. Support implementation plan activities and address PD for: 1) DPFs based on their prioritized needs; 2) new special educators and those working under alternative licenses needing assistance; and 3) SEAs and crisis prevention training that includes strategies for deescalating behavior, alternatives to student restraints, etc.

Recommendation 6. Consider current school-based special education and related service personnel allocations and improve recruitment and retention practices and outcomes.

Having an appropriate level of support for school-based special education and related services activities is necessary to accelerate SwD outcomes.

a. Data Review. Have the district's MTSS leadership team address eight areas for data review: FTE staff ratios (Exhibits 5b-d); workload study; retention; caseloads for special schools compared to regular schools; redundant electronic data; and recruitment and retention activities.

b. Implementation Plan For each of the areas referenced above, supplement MPS planning with actions needed to support activities related to this recommendation.

c. Written Guidance and Information. In addition to information needed to implement the above, expedite written notice that school schedules need to first account for special educators' due process activities. This allows these teachers the time needed to complete required activities and focus on planning and providing quality instruction.

d. Data Analysis and Reporting. Collect and report monthly on recruitment and retention data for special education related services personnel to pertinent supervisors, associate superintendents by portfolio schools to provide proactive support where needed.

e. Monitoring and Shared Accountability. Establish KPIs for recruitment and retention. Have the MTSS leadership team review the monthly recruitment and retention data against KPI targets. Adjust implementation plans as needed to improve outcomes.

VI. COMPLIANCE AND OPERATIONS

This section addresses special education compliance issues and operations focusing on a fiscal matter, third party billing, and transportation.

Special Education Compliance, Due Process Activity, and Guidance. MPS has a lower level of Office for Civil Rights (OCR) and state complaints, and due process hearing requests compared to

other districts. The monitoring and compliance staff is highly regarded for their responsiveness and expertise. While MPS provides several resources to support special education procedural safeguards, such as weekly office hours, "Success Factors" training, and a Due Process Notebook that was passcode protected. There is need for a webpage with comprehensive guidance for all aspects of special education and related services processes and practices.

MDE Findings Related to State Performance Plan Outcomes. MPS received two MDE letters. A December 2023 letter reflected MPS's compliance related to special education racial/ethnic disproportionate representation (based on information showing policies, procedures, and practices did not contribute to disproportionate data). Another June 2024 MDE letter outlined six areas of noncompliance (based on only nine student records) that required corrective actions.

Fiscal Management. There is need for the special education department to have a personnel succession plan for its continuing budget management, which includes contract and out-of-district placement payments.

Third Party Billing (Medicaid). MPS could increase Medicaid revenue by identifying one individual authorized to coordinate all associated activities for eligible service providers across departments and requiring and monitoring weekly service documentation.

Transportation. Twenty-five MPS schools have 48 different bell times in the morning and 34 in the afternoon for SwDs having IEPs calling for different arrival and leave times. Reportedly, this model increases costs (including for SEAs needed to accompany students on buses), complicates transportation management, and has contributed to bus driver shortages.

Recommendation 7. Support continued special education fiscal management; improve third party billing and reimbursement; and address numerous bell times that impact transportation.

Consider the following actions to address these issues.

a. Personnel Alignment. To help increase third-party documentation and reimbursement, as soon as possible authorize an individual having this area of expertise to facilitate a group representing all personnel areas with documentation responsibilities. Have the individual directly report to the deputy superintendent and senior finance officer any implementation issue requiring their attention.

b. Implementation Plan. Include in MPS's plan: 1) translation of IEPs into major languages other than English in accordance with state requirements; 2) succession planning to ensure expert special education fiscal management continues for contract management and out-of-district payments, etc. With the *Specialized Support* entity, unify fiscal management for special education and *Supportive Learning*; 3) consistent third-party reimbursement documentation based on expectations, and establish a reporting template to track progress and share revenue reports with designated administrators; and 4) with representative stakeholders review bell times and reduce their number where possible to improve efficiency and coordination and student benefits.

c. Written Guidance and Information. Include in the *Specialized Support* manual expectations for 1) third-party documentation, including uploaded frequency of service documentation; 2) administrative SwD transfers; and 3) IEP translation into common languages.

d. Differentiated PD. 1) Address discipline procedural safeguard requirements for SwDs, including the consistent application of manifestation determination review (MDR) criteria. 2) Provide personnel involved in third-party documentation the training they need to carry out their responsibilities. 3) Train supervisors (including principals) about their monitoring of service documentation reports and expected follow up action.

d. Data Analysis and Reporting. Have MTSS leadership team representatives monthly review: 1) *Specialized Support* position vacancies by personnel area; and 2) rates for third party services documented against those expected for the district overall, by each personnel group, and by associate superintendent portfolio schools by personnel group.

f. Monitoring and Shared Accountability. Establish KPIs and associated monitoring and follow up actions for: *Specialized Support* position vacancies and retention; and third-party service documentation by personnel area. Report to the MTSS district level team encountered barriers needed for their follow-up action.

VII. Shared Accountability for Results

Various aspects of this report addressed administrative fragmentation that has negatively impacted collaboration. With most SwDs educated in regular classes 60 percent of the day, all individuals supporting general education must work together and share accountability for practices inclusive of SwDs to accelerate achievement and improve social-emotional and behavioral wellbeing. Meaningful intersections are challenged by 11 separate district office entities associated with teaching and learning, with some reporting to the deputy superintendent and others to the senior academic officer. While organizational adjustments would be useful, there is need for a holistic accountability structure that includes a universal source for all associated data and indicators common across the SPP, MPS's Strategic Plan, SIP template, and A&I Plan.

SPP and IDEA's Results Driven Accountability. The federally required SPP has 14 indicators. MDE set 48 targets for these indicators and found MPS did not meet most of them (41%). Indicators are based in performance (e.g., SwD proficiency rates) and compliance (e.g., timely initial evaluations). (See Section VI. Exhibit 6a. SPP Indicators/MPS Outcomes.)

MPS's Strategic Plan has four goals with prioritized 2024-25 strategies. SPP indicators cross over academic achievement (Indicator 3); student well-being (Indicators 4a-b concerning all OSSs and by race/ethnicity).

SIP Portal **Template.** MPS's Board Policy 6121 calls for a system of supports for at-risk students, including an MTSS approach to their academic, social, emotional, and behavioral needs. Yet, the SIP template does not appear to guide the use of MTSS strategies. A SIP review showed some were well-detailed and others were not, lacking evidence-based practices particularly for positive

behavior supports. This inconsistency raised questions about SIP monitoring and assistance.

Achievement & Integration (A&I) Plan. MPS's plan addresses Black, Indigenous, and people of Color (BIPOC) students. Although the state's A&I program does not reference disability, each BIPOC group includes SwDs whose needs are likely to be invisible if the plan's four goals do not specifically address their needs, e.g., consider SwDs' leadership and voice. Another example applies to MPS's list (at page 8) of the 21 racially identifiable schools (which omits MPS's two special schools) that have Black SwD rates significantly exceeding the 20 percentage point disparity with MPS's overall rate (25%): River Bend (66%) and Harrison (70%). These schools would benefit from the activities and funding associated with this program.

Recommendation 8. Improve MPS's shared accountability for improved student outcomes.

By aligning areas targeted for improvement with shared accountability by district office administrators directly and indirectly supporting teaching and learning and school leaders, MPS will be well-suited to foster a collaborative environment that drives strategic initiatives, enhances student outcomes, and ensures accountability across all levels of the district.

a. Personnel Alignment. Align personnel efforts across common plan activities. Identify and connect relevant administrators across district departments and offices to coordinate their work and support for school-based personnel and students.

b. Data Review. Review common data in the SPP indicators (and state targets), MPS's Strategic Plan, and A&I Plan to understand ways these plans overlap or potentially overlap with desegregated data that includes disability overall and by race/ethnicity. (See SPP indicators, MPS/MDE outcome rates, and targets at Section VIII. Exhibit 6a.)

c. Implementation Plan. Consider MPS plan components to: 1) embed MTSS principles relevant to achievement and behavior/social-emotional wellness; 2) incorporate SPP indicators; and 3) apply disaggregated data for disability and race/ethnicity where appropriate. Also, consider –

- **MPS Strategic Plan.** 1) For Section 1.2's reference to sustaining culture include the area of disability. 2) For Section 2.1's Comprehensive School-based Mental Health System (CSMHS) incorporate SwDs with intense needs, and the social-emotional and behavioral interventions (SEB) district team include *Specialized Services* personnel with high levels of expertise. 3) For Section 4.1 Climate Framework consider unifying school-based Instructional Leadership Team (ILT) and Equity School Climate Team (ESCT) to address common strategies and activities (with side meetings for different purposes).
- **Achievement and Integration (A&I) Plan**. 1) Include disability in World's Best Workforce (WBWF) plans. 2) Include MPS's two special schools with high rates of Black students, which appear to meet MDE's racially identifiable school criteria. This would enable the schools to have the benefit of associated funding for planned activities. If a state rule excludes these schools from inclusion as a racially identifiable school, expeditiously identify other funding

sources for otherwise covered activities.

- **SIP Template**. 1) Follow Board Policy 6121 (Implementation of Supports and Interventions) requirement that "2. Each school shall **develop and publish a plan** within the parameters established by the Superintendent, providing interventions and multi-tiered supports to students." (Emphasis added.) 2) include in SIP guidance "Look Fors" relating to SwDs, modeled after the exemplary MOA American Indian Strategies; 3) use representative district office personnel involved with teaching and learning to support associate superintendent's review of their portfolio schools' SIPS; and 4) Include support for SwD postschool education, training, and/or competitive employment (SPP indicator 14).
- **MPS Accountability Statement**. Modify as follows the district's Accountability webpage for continuous improvement: "In this way the MPS Continuous Improvement Process addresses the needs of all schools and all **departments supporting academic, behavior, and social-emotional wellbeing.**

d. Written Guidance and Information. Include guidance and information needed for staff to implement Recommendation 8.

e. Differentiated PD. With input by associate superintendents and SEB experts, provide PD to schools with comparatively higher OSS and ISS rates (for students – and Black students - with and without disabilities) and with data showing need. Involve the Black student achievement office in this activity. Also, use associate superintendent meetings with principals to communicate SIP planning changes related to this recommendation.

f. Data Analysis and Reporting. 1) Absent a data dashboard that would include the following, have a universal center to store common data for all planning documents for easy access and reliable data usage. 2) Ensure consistent reporting of disaggregated data, particularly for SwDs (and by race, ethnicity, and gender). 3) Consider disaggregated data for students with and without IEPs as overall figures can mask disparities. (This applies also to EL and other student groups with concerning data.) 4) For the MPS Strategic Plan (Goal 3) include disaggregated vacancy and retention data by *Specialized Services* personnel areas.

g. Monitoring and Accountability. Compile a consolidated summary report with above-referenced data elements to the Board's Committee of the Whole. Except for sensitive or confidential information, ensure all linked documents are not password protected.

Recommendation 9. Identify a project manager reporting to the deputy superintendent to coordinate and support the above recommendations that MPS will implement.

Have the project manager report to the deputy monthly implementation progress and any barriers requiring additional consideration or action.

Recommendation Matrix

The matrix below shows for each of the eight major recommendations a set of nine functional activities that apply in full or part to each. The matrix shows how these functions span and

intersect the eight major recommendation areas. For implementation purposes, in addition to reviewing each recommendation address each of the functions that cross areas.

	Recommendations							
	1. MTSS Framework and Implementation	2. Referral, Assessment & Eligibility	3. Achievement Data	4. Instructional & Behavioral/ Social-Emotional Supports	5. Increased Collaboration	6. Personnel Allocation-Recruitment/Retention	7. Compliance, Fiscal Matters &	8. Shared Accountability for Results
Personnel Alignment	**1a**	**2a**		**4a**	**5a**		**7a**	**8a**
MTSS Leadership Teams	1b							
Data Review	**1c**	**2b**	**3a**	**4b**		**6a**		**8b**
Implementation Plan	1d	2c	3b	4c	5b		7b	8c
Written Guidance/Information	**1e**	**2d**	**3c**	**4d**	**5c**	**6b**	**7c**	**8d**
***Specialized Support* Manual**		2d	3c	4d	5c		7c	
Map Resources/Fill Gaps	**1f**			**4e**				
Differentiated PD	1g	2e	3d	4f	5d		7d	8e
Data Analysis/Reporting	**1h**	**2f**	**3e**	**4g**		**6c**	**7e**	**8f**
Monitoring/Accountability	1i	2g	3f	4h		6d	7f	8g

Discussion And Recommendations

This chapter reviews MPS processes and practices that impact teaching and learning for all students, and especially for students with disabilities (SwDs).[3] Our findings and related recommendations are organized by the following seven areas.

I. MTSS for Accelerating Student Achievement and Well-being
II. Disability Demographics and Eligibility
III. Data Impacting SwD Achievement
IV. Support for SwD Achievement/Wellbeing
V. Administrative/Operational Support for SwD Teaching and Learning
VI. Compliance, Special Education Data Platform, and Fiscal Matters
VI. Shared Accountability for Results

I. MTSS to Accelerate Student Achievement And Wellbeing

School districts have historically requested an SST to review administrative and school support for SwDs teaching and learning. However, for most students this support must begin prior to their qualification for special education. The strength of a district's implementation of a Multi-Tiered System of Supports (MTSS) framework influences the achievement of all students, and the extent to which they are referred for special education. As a result, our reviews begin with an assessment of school districts' MTSS framework and implementation.

Recognizing the importance of this work, in 2012 CGCS published a Multi-Tiered System of Supports (MTSS) white paper to inform its membership about the importance of this foundational framework for teaching and learning. Supported by a large body of consistent literature and on-line presence, the framework is designed to improve educational outcomes for *all* students by supporting core curricular instruction and the use of interventions for students who need instructional or behavioral interventions or enrichments to flourish. As the white paper describes, MTSS has significant implications for the identification of students suspected of needing special education and the process for screening evaluation referrals by school personnel.

> Factors other than a disability may account for students having difficulty in language and literacy (as well as numeracy). Such factors may include the nature of a student's educational opportunity, as well as teaching practices or assessment tools that are insensitive to cultural or linguistic differences, for example. Other circumstances might include family circumstances, e.g., children who grow up

[3] In this report, students with disabilities are those who have an individualized education programs (IEPs) and receive special education services. They are also referred to as students with IEPs. In Florida, the term Exceptional Student Education (ESE) is also used. Unless otherwise stated, SwDs exclude those who are eligible for services under Section 504 of the Rehabilitation Act (Section 504).

without access to nutritious food, who live in chaotic households, and who have no written materials in the house. When implemented with fidelity MTSS can help ensure that these factors are not blocking the way for students as staff members consider making a special education referral or determining eligibility for special education.

This section includes information about the following:

A. Achievement and Graduation
B. MTSS Framework
C. Reading Instruction
D. Math Instruction
E. English Learner Instruction
F. Behavior and Social-Emotional Wellness
G. Professional Development
H. Data Reporting

Achievement and Graduation Data

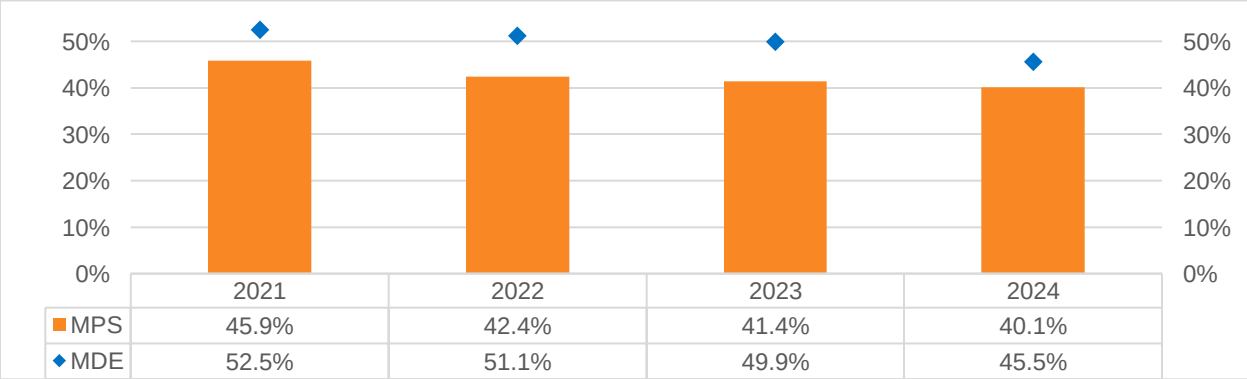
Student achievement and graduation data over time contribute to understanding the strength of teaching and learning, and MTSS practices for MPS students. The information below shows MPS Minnesota Academic Standards (MCA) reading and math proficiency and high school graduation rates fall below state averages, leaving much room for improvement. Although district suspension rates are low overall, much higher rates occur at grades 6 through 8.

1. Reading Proficiency

Exhibit 1a. MCA Reading Proficiency Rates Over Time show –

- In 2024 the MPS rate (40.1%) decreased by 5.8 percentage points (pp) from 2021. The state's 2024 rate (45.5%) also decreased but by a slightly larger extent (7 pp).
- Over each of the four years, MPS rates were below state rates; however, the gap was smaller in 2024 than in 2021 (from 6.6 pp in 2022 to 5.4 pp in 2024).

Exhibit 1a. MCA Reading Proficiency Rates Over Time

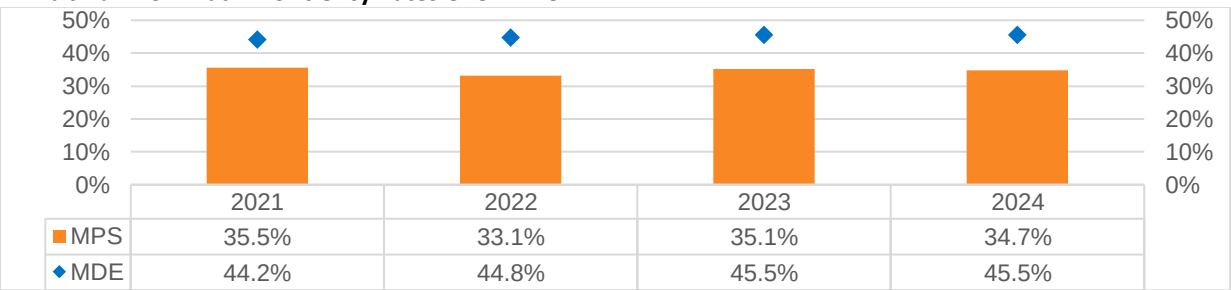


2. Math Proficiency

Exhibit 1b. MCA Math Proficiency Rates Over Time show –

- In 2024 the MPS rate (34.7%) decreased (by 0.8pp) from 2021. The state's 2024 rate (45.5%) increased slightly (1.3 pp).
- Over each of the four years, MPS rates were below state rates. The gap was wider in 2024 than in 2021 (from 8.7 pp in 2021 to 10.8 pp in 2024).

Exhibit 1b. MCA Math Proficiency Rates Over Time

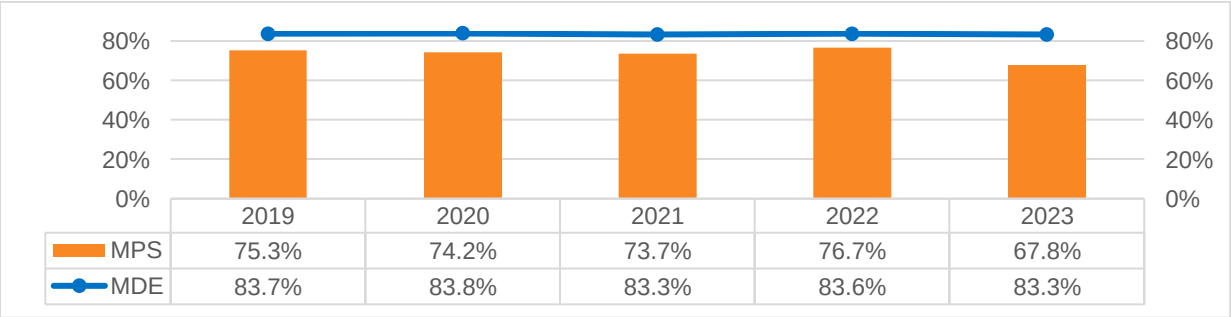


3. High School Graduation Rates

Exhibit 1c. Graduation Rates Over Time show –

- In 2023 the MPS rate (67.8%) was lower (by 7.5pp) than the 2019 rate. The state's 2023 rate (83.3%) decreased slightly from 2019 (0.4pp).
- Over each of the four years, MPS rates increasingly fell below state rates (from 8.4pp in 2019 to 15.5 pp in 2022).

Exhibit 1c. Graduation Rates Over Time



MTSS Framework

This section describes various ways MPS has used the MTSS framework to address student achievement. information below pertains to MPS Board Policy 6121: Academic, Social Emotional and Behavior Supports, MPS's Literacy and Math Multi-layered Practices Guidance (Literacy and Math Guidance), and interviewee feedback. Note: the district's activity in the area of behavior support has not yet been developed and is addressed further below at Section I.F. Behavior and Social-Emotional Wellness.

1. Board Policy 6121. Academic, Social, Emotional, and Behavior Supports

Board Policy 6121 effectively establishes MPS's commitment to MTSS. The Policy's purpose is quotation worthy.

> **Purpose.** Minneapolis Public Schools is committed to preparing students to be college, career and community ready. In order to meet this goal all educators believe that all students learn and can achieve high standards as a result of effective teaching. A school system informed by this principle has effective systems that support adults in providing high quality core instruction and implementing appropriate interventions for students, informed by research and supported by standards-based curriculum. Effective teaching is differentiated to meet individual student needs and adheres to universal design principles.

2. MPS's Literacy and Math Multi-Layered Practices Guide

MPS developed its 2024-25 Literacy and Math Multi-layered Practices Guide (Literacy and Math Guide) to systematize MTSS across the district for literacy and math. This document is aligned with MPS's Vision and Mission, and the Minnesota MTSS Framework (MnMTSS). The MPS document was Initially created during Fall 2023 and reviewed in Spring 2024 by a committee representing Academics, Multilingual, Special Education, Strategic Initiatives, and MTSS departments. The draft has a significant amount of excellent information but will require extensive PD for school personnel to internalize and operationalize.

According to a district representative, the document is in a draft stage because of a desire to further build out the family engagement section. While the document includes this area as an appendix, it is largely generic, based on MDE's MnMTSS information, and links "Caregiver Communication" letter available in four languages. Also, reportedly the draft intentionally is not referred to as an MTSS Handbook as it does not include information relevant to social-emotional learning (SEL) and positive behavior support. Nevertheless, the literacy and math information contents follow MTSS principles and addresses literacy and math core instruction, assessment, multi-layered practices and supports, data-based decision-making, and fidelity consideration. The document is detailed, includes many links to more detailed information, and has MPS-localized information for each of these areas, such as grade level delivery models, grade level core and supplementary materials, secondary intervention class grading and considerations, decision making data protocols and decision trees, and scheduling guidance. Also, we received 19 random Sharepoint documents for such varied areas as K-4 literacy, literacy plan for state, PL curriculum, math, AVID, EL scheduling, IB, elementary curriculum guides, dance, arts, music, theatre, visual arts, etc. To the extent these are relevant to MPS's comprehensive MTSS framework, text is needed to frame their relevance with links to each document's more detailed information.

Importantly, the document stresses that MTSS does not constitute a process or path leading to special education. But its infrastructure, instructional practices, and generated data play an

important role in special education's identification and qualification processes. It also recognizes that when these conditions are not in place, special education racial/ethnic disproportionality occurs.

3. Interviewee Feedback

MPS has had a 20-some year history of engaging in problem-solving and use of curricular based measurements for progress monitoring, which are important components of MTSS. With staffing changes and the pandemic, these practices reportedly "fell off." Toward the end of the 2023-24 school year, staff developed the Literacy and Math Guidance described above with support from the state's Collaborative Minnesota Partnerships to Advance Student Success (Compass). The goal is to have a concise system of materials with guidance for their use, coaching, professional development (PD) grounded in research, and quarterly reporting to the board.

Interviewee feedback included some confusion about how the Literacy and Math Guidance overlaps with MTSS. This confusion may be due to the document's focus on literacy and math, the exclusion of behavior and social-emotional guidance, or interviewee lack of familiarity with the document. An overriding concern is that when interventions are not implemented as expected, students will not achieve, may act out, and too frequently are referred for special education to receive the only assistance readily available. In some circumstances, data reported in various sections below show racial/ethnic disproportionate outcomes. Another concern is a misperception by some that once qualified for special education, SwDs are no longer permitted to receive general education interventions. This issue is not addressed in the Literacy and Math Guidance. Further, when students transfer to MPS without current IEPs or documentation to support special education eligibility (especially from other countries), general education interventions are not consistently available to support them until the special education process is completed.

Below are additional concerns expressed about the district's MTSS implementation practices and their relationship to the district office's organizational structure and support.

Fragmented Implementation

Reportedly, while the literacy and math MTSS framework looks good on paper, much work is needed to translate it into practice which is currently inconsistent across schools. Too few personnel are available to support schools and insufficient PD availability challenges implementation. (As discussed further below, state PD requirements related to the READ Act has priority for PD time.) Furthermore, unclear framework implementation expectations (including for support for positive behavior) and a shared accountability for doing so challenges efforts to accelerate improved student outcomes to the extent otherwise possible.

Coherent Leadership and Accountability

The lack of clear ownership and oversight for MTSS contribute to inconsistent implementation across schools. For example –

- **Districtwide MTSS Team.** MPS lacks a districtwide MTSS team to guide and oversee implementation. Reportedly, in the past the district received no-cost technical assistance from the SWIFT Center to help launch such a team but this action was not successful. A district team would address such concerns perceived as territorial fund usage, adoption of new curricula, support for eduClimber, etc., and to oversee monitoring of expected practices. It would also help to address perceived siloed activity at executive director levels, insufficient collaboration, and decisions made without sufficient school-based input. These issues impact leadership longevity when challenges appear insurmountable.
    - **MTSS Leadership.** The individual who led MTSS several years ago was transferred from Academics to Strategic Planning to support the inclusion of behavior and social-emotional wellness in the MTSS framework. The position was cut (along with another supporting position that had not been filled). The former MTSS lead now works in the special education department and reports to the school psychologist manager. The individual now supports literacy intervention PD for K-12 teachers and other aspects of intervention. At the time of our review, the MPS organization chart does not reflect the area of MTSS.
    - **MTSS Lead.** Although the Draft Academics Guidance document refers to MTSS leads
- **School-based Interventionists and MTSS Leads**. Although the Draft Literacy and Math Guidance document refers to these positions (pages 17-18), as addressed directly below, interventionist positions have been significantly reduced, and it does not appear that MTSS leads are widely in use.
- **Literacy and Math Support.** Two content leads focus on literacy and two focus on math implementation, as well as all PD.
- **Behavior and Social-Emotional Wellness Support.** Separate departments for equity and school climate (with SEL responsibilities) and student support services (with physical and mental health responsibilities) report to the deputy superintendent. Special education, which has numerous personnel with significant expertise in behavior and social-emotional wellness, reports to the senior academic officer. The separation of equity and school climate and student support services from academics likely contributed to the separate development of the literacy and math document and lagging development of MTSS's behavior and social-emotional wellness component. This circumstance is significant given the active interaction between behavior and academic achievement that requires consideration through a unified MTSS framework and practice, not to mention the relevant Board Policy provisions addressed further below.
- **Accountability.** The MPS strategic plan and its four goals do not reference MTSS implementation to support stated outcomes. For example, two relevant goals address Academic Achievement and Student Well-being. Without taking away any value from these goals, their effectiveness diminishes without attending to MTSS's principles important to accelerating achievement for students falling behind their peers both academically and behaviorally.

Interventions and Interventionists

There is a desire to make sure that Tier II and Tier III interventions supplement, and do not supplant, core instruction. Reportedly, core instruction is often far below grade level standards. In the past, reading and math intervention specialist positions were available to all schools. According to interviewees, these personnel gave some optimism that MPS would be able to support MTSS implementation with fidelity. Due to their overall cost, the terminated Covid funding source, and staffing shortages, the interventionist service model became unsustainable. About 50 positions remain at Title 1 schools where principals could choose to use funds for a reading or math interventionist or for a paraprofessional. Some principals continued positions using school funds. District staff use News and Notes to share information for interventionists with principals but there is concern that the material is not consistently read due to the volume of information communicated through this mechanism.

Coaching and School Improvement Specialists

Interviewees reported that district math and literacy coaches are generally no longer available for teachers due to fiscal constraints. MPS has executed a $1M contract with the Center for Applied Research at the University of MN to coach some school-based personnel at schools. Unused funds have been extended, and discussions are in place to expand this investment. Coaching will focus on support for teachers of students with low achievement and SwDs. School improvement specialists available at some schools help to write student improvement plans and goals and some engage in instructional coaching when skilled to do so.

Use of Psychologists

Many school districts with which we have experience use the expertise of psychologists to support MTSS activities. Their graduate school training emphasizes this area of learning, which gives psychologists expertise not typically available to other personnel groups. These personnel, however, have limited involvement or influence in this area. Interviewees shared that “funding sources” prevent them from participation which is not typically an issue in other CGCS districts.

Problem-Solving, Progress Monitoring and Walk Throughs

Reportedly, the team problem-solving process described in MTSS literature is no longer widely used at MPS schools. At some schools, teams track tiered interventions, but some interviewees expressed concern that staffing shortages make it difficult for them to meet regularly. While school walkthroughs may be used to consider the extent to which schools and teachers are using instructional materials, tools, and assessments as expected, this process does not substitute for team-based problem-solving.

Professional Development

As with other school districts with which we are familiar, there is little time during the school day for PD. This is especially true for MPS with its significant LETRS training investment. One reported exception applies to the International Baccalaureate (IB) program, which has PD requirements aligned with international standards. As a result, all new IB teachers receive PD during the day with substitutes available to cover their classes. This practice is not typical for other instructional

programs. Although PD is available for the UFLI supplementary program and progress monitoring, it is not clear how consistently PD reaches all educators in need, especially when training is not conducted during the school day. For example, one anecdote concerned paid Saturday training for teachers of sheltered English with only two educators attending. Finally, associate superintendent meetings with principals could be used (but reportedly are not used) to embed PD for various core instructional strategies that would enable SwDs and English language (EL) students (as well as low achievement students) to benefit.

Reading Instruction

Minnesota's relatively recent READ Act, with its comprehensive PD requirements, is expected to have a significant positive impact on reading instruction for students.

1. Written Information

The following information pertains to the MN READ Act and the district's PD implementation, including elements of the MPS/MFT Memorandum of Agreement.

MPS's Literacy and Math Guidance incorporates Minnesota's READ Act requirements that include –

- Use of UFLI and Functional Phonics for universal/core Tier I instruction. Next school year, MPS expects all schools to be using UFLI instructional materials, which are aligned with the Science of Reading
- Intervention for students reading below grade level (as measured by FastBridge Screeners) until they are reading at grade level.
- District-approved diagnostics, intervention curriculum, and progress monitoring tools.
- MPS decision trees and Literacy and Math Guidance decision-making tools.
- FAST screener three times per year (fall, winter, spring) for students receiving intervention.
- Characteristics of dyslexia screener for all grade four to 12 students reading below grade level.
- Literacy interventions taught by a teacher who has been/will be trained in the science of reading, including Intervention and special education teachers.
- Interventions to supplement special education and English Learner service minutes.

READ Act Professional Development

Beginning July 1, 2024, the READ Act required each district and charter school to provide teachers and instructional support staff with responsibility for teaching reading with MDE approved PD on evidence-based reading instruction with MDE funding. By July 1, 2026, phase 1 educators must complete their PD (with extensions available for LETRS training). This requirement applies to a broad range of teachers, including PreK and EC teachers, EC special educators responsible for early literacy/reading instruction; K-3 school readiness teachers; K-12 teachers licensed to teach

English to ELs; K–12 reading intervention teachers; K–12 special educators teaching reading; PreK–5 curriculum directors; employees selecting literacy instructional materials for grades PreK–5th or 6th grade (depending on school structure). As an indication of the seriousness of the READ Act requirements, by July 2026 individuals must submit to their district a certificate of completion with a passing score of 80 percent.

- **Phase 2 Educators**. With PD registration to begin by January 2026, phase 2 must be completed by July 1, 2027. Phase 2 applies to grades 4–12 teachers responsible for reading instruction; teachers in state-approved alternative programs who provide reading instruction; grades 6–12 curriculum directors; and employees selecting literacy instructional materials for these grades.
- **Paraprofessional/Instructional Support Staff**. PD for instructional support staff will be offered through the Regional Literacy Network and receive four 2-hour modules. MDE will select districts to pilot this PD from March 1 to June 30, 2025. Registration will begin July 1, 2025, and cohorts will start in August 2025, with completion by July 1, 2026.

LETRS and OL&LA PL

MPS selected the Language Essentials for Teachers of Reading and Spelling (LETRS) program for its PD. According to the program's website, LETRS addresses reading, spelling, and related language skills and provides educators with in-depth knowledge and tools that they can use with any reading program. It is noteworthy that the PD is International Dyslexia Association accredited, follows a Structured Literacy approach, has a Science of Reading pedagogy, and provides a depth of knowledge and tools to teach language/literacy skills to every student. MPS also selected CORE Learning's Online Language and Literacy Academy (OL&LA) for teachers of EL students. This program is also based on the science of reading, second language acquisition, and the science of learning.

MOA between MPS and MFT

A Memorandum of Agreement (MOA) between the MN Federation of Teachers (MFT) and MPS set parameters for the district's LETRS PD. Under the MOA completion dates for Volume 1 Units 1 to 4 is June 30, 2025 and Volume II Units is June 30, 2026. MDE agreed to provide each teacher with an $875 stipend upon successful completion of each PD volume. Stipends of $500 apply to EC teachers and for OL&LA. Teachers are to use their weekly Professional Learning Community (PLC) time for PD with team meetings once monthly. Also, a day in February 2025 and three days in 2025-26 are to be allocated to PD.

2. Interviewee Feedback

In the recent past, MPS reportedly used as many as 16 different programs to support literacy or as one interviewee cited, "72 different programs across 72 sites." Various state led actions have presented opportunities to improve this circumstance and improve student outcomes, such as the state's 2020 English language arts (ELA) standards and the July 2023 READ Act's emphasis on PD for all personnel directly and indirectly involved with reading. These actions coincided with

the MPS's community support for improved outcomes, which led to the district's selection of MDE approved instructional materials and financial support. One challenge is related to ELA standards that are inclusive of materials for Native American students; however, resources are scarce.

There is a broad sense that with only three PD staff, the district needs to devote more resources to carry out the state-required PD as specified by the MOA. This circumstance appears to be extremely stressful for all involved, including supervisors, trainers, and trainees. The latter group expressed concerns about the amount of time the PD requires, including time during weekends and evenings for online work.

Math Instruction

Written information and interviewee feedback reflected less information than for reading, reflecting a need for more support in this area.

1. Written Information

MPS shared the following documents related to math instruction.

- **Culturally Sustaining Mathematical Practices.** This document describes for various mathematical practices culturally sustaining approaches, impact to students and to educators, and examples/ideas for achieving culturally sustaining approaches in classrooms.
- **Literacy and Math Guidance.** In addition to math screeners and diagnostic assessments, the document lists progress monitoring measures and interventions to support math instruction. The document did not identify core instructional materials in place.

2. Interviewee Feedback

MPS discussions have led to mathematics curricular revisions and associated PD. These activities involved special education department representatives, which ensured both special and general educators received PD focusing on core instructional mathematics practices. The collaboration also produced a walkthrough protocol for classroom observations and site visits with principals, and ensured special educators instructing SwDs taking regular state assessments received the same mathematics instructional materials as general educators.

There is an increased sense of urgency to provide PD for both veteran and new teachers who have an insufficient understanding of mathematics content, pedagogical content knowledge and require support to deliver associated core instruction to all students in inclusive classrooms. MDE is currently reviewing new mathematics standards. An MPS K-12 steering committee will consider new core curriculum upon the standards' execution. When the state standards become operational, the need for PD will become even more pronounced.

The MPS mathematics program encompasses Bridges (K-5) for core instruction and Bridges Intervention compliments regular math instruction, along with FastBridge and iReady

assessments. Standard core instruction programs also apply to middle schools (iReady) and high schools (OpenUp Resources). Intervention programs apply to both middle and high schools (iReady Supplemental, Bridges Intervention, and Do the Math). The Bridges and OpenUp Resources core instructional programs have: a common philosophy of teaching and learning mathematics; strategies to address unfinished learning; and language supports embedded within the programs.

An MPS representative clarified that when combined with the teacher toolbox and workbooks, iReady supports deeper mathematics understanding. The program's common assessments drive inquiry-based resources. However, the team noted that limited guidance was apparent for teachers' use of the toolbox and workbooks in class.

We reviewed the Literacy and Math Guidance section for General Outcomes Measures (GOMs) related to math (at page 11) and compared it to the Minnesota State Standards. According to the Guidance, GOMs give information about whether an intervention is effective in reducing the difference between a student's current performance and expected performance (i.e., rate of improvement). In most instances, details were not sufficient to inform interventionists or special educators. For example, kindergarten GOMs pertained to FastBridge's "earlyMath numerical identification" with skill assessment related to numeral identification (0 to 31). However, these GOMs should correspond at least to FastBridge's intervention and reflect concepts and skills that inhibit student access to core Tier I instruction. For example –

- **Structuring 5 and 10 by Using Objects**. With blocks children can group these figures in various ways: 1 group of 5 blocks, 2 groups of 2 with 1 left over (2 + 2 + 1 = 5), etc. Visual aids and drawing are also useful to aid understanding.
- **Learning to Compose and Decompose**. For example, writing 11 to 19 as a 10 with some ones remaining, e.g., 11 is 10 + 1; 12 is 10 + 2; and so on, up to 19. This practice helps children learn how these combinations are related to the number 10, which helps them grasp the concept of place value.

English Learner Instruction

Over the last two school years, some 2500 students new to the U.S. enrolled in MPS schools. Interviewees reported that these students generally receive English language development (ELD) instruction to support English reading, writing, speaking and listening. The district's multilingual (ML) Department's website also reported that some students receive instruction in their first language to teach grade-level content (bilingual education) or dual language instruction.

Interviewees also reported that about 200 EL teachers, with 50 added over the last two years, are assigned to schools. MPS has been supporting EL teachers to become content-area certified. At the elementary level, students receive a period of ELD instruction daily. At the middle and high school levels Sheltered Instruction Observation Protocol (SIOP) classes are available to present core instructional content, some of which are co-taught by general and ESL teachers.

Except for a reference to Decision Trees that includes one for Multilingual students and Dual Language Guidance (page 21), the Literacy and Math Guidance does not reference intervention materials or other tools for English learners. (Google Docs Decision Tree content was not accessible.)

Behavior and Social-Emotional Wellness

In response to our request about the district's support for students with the most challenging behavior, including (but not limited to) SwD, we received the Recommendations for Intervention Best Practices Guide. Although the Guide referenced various SEL curriculum applicable to all students, the recommendations mostly applied to SwDs. No information was provided related to MTSS's incorporation of tiered positive behavior supports and interventions.

A district representative also shared MPS's draft SEL and Behavior Multi-layered Practices Guidance (2024-25), which was written at the end of the 2023-24 school year. Drafters intended the document to be a companion to the Literacy and Math Guidance. However, the document was not updated beyond descriptions of tiered supports at page 7. While the Guidance references Tier II positive behavior interventions and supports (PBIS), it was presented in general terms. The goal was to merge the completed document with the Literacy and Math Guidance to provide a whole child framework. Interviewees consistently reported that MPS's current activities lack a comprehensive approach to support students with challenging behavior and information about the development positions on behavior were not apparent. Various independent departments have personnel with expertise that would support such development and implementation. Although many are working with school staff based on their individual department's lens, there is little, if any, collaboration across reporting lines.

The information in this section addresses the following –

1. Board Policy 6121. Academic, Social, Emotional, and Behavior Supports
2. Out-of-School and In-School Suspension Data
3. MPS Voluntary Agreements with OCR and DHR, and Prior Use of PBIS
4. Social-Emotional Learning and Mental Health Support

1. Board Policy 6121 Academic, Social, Emotional, and Behavior Supports

The previously referenced Board Policy includes the following language relevant to behavior supports for students, with emphasis added for relevant text –

> Even the most effective core instruction will not be sufficient for every student to make adequate progress. The district must adopt a system of supports, interventions and trauma-based care to address academic, social, emotional, **and behavior needs** of students who are at risk of not meeting state proficiency standards. Interventions are evidence-based actions, implemented with fidelity, the effects of which are monitored for student progress.

Effective System of Supports. The district shall adopt a multi-tiered system of instruction to assist students to be academically, socially, and behaviorally successful. …

2. Each school shall **develop and publish a plan** within the parameters established by the Superintendent, providing interventions and multi-tiered supports to students. [Note: School Improvement Plans (SIPs) are discussed at Section VII.D. School Improvement Planning. As addressed there, a random review of SIPs did not reveal contents aligned with this aspect of the Board Policy.]
3. Early identification of academic, social, emotional, **and behavioral needs** for instruction and supports beyond what is provided in core instruction is essential to student success; therefore, evaluation of student needs shall be on-going and data-based, measured by multiple means of assessment, …. Additional screening, assessment, and progress monitoring measures may be used **to determine the necessary supports for students requiring behavior supports.**

2. Out-of-School (OSS) and In-School (ISS) Suspensions

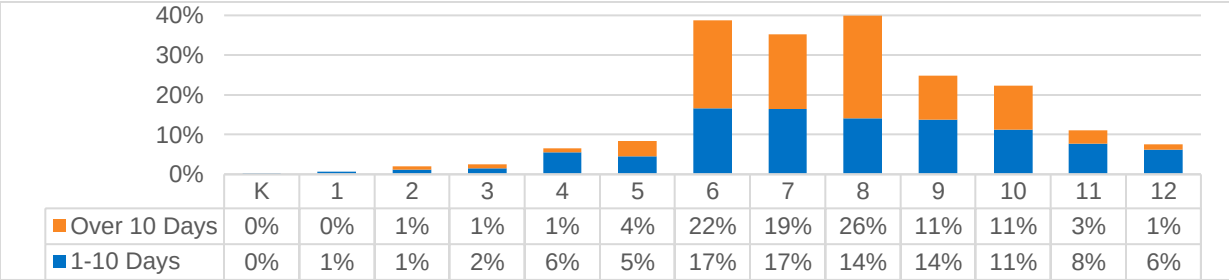
MPS's need to positively support student's behavior is evident based on its OSS and ISSs data summarized below. The data show OSS and ISS rates by number of removal days and significant variances by grade. Data also show Black students without disabilities were 23.3 times more likely than non-Black peers to receive an OSS for one or more days and 71.2 times more likely to have an OSS for more than 10 days. The risk ratio for American Indian students without disabilities was also high at 8.5. Also, Black students without disabilities were 19.7 times more likely to receive an ISS compared to non-Black peers. (Note: Section III.E. Academic Achievement Outcomes for School-Aged SwDs reports OSS and ISS risk ratios showing disproportionately higher removals for Black SwDs compared to non-Black SwDs.)

Out-of-School Suspensions

Overall, 6.1 percent of all MPS students received OSSs for 1 to 10 days and 0.8 percent for more than 10 days. Exhibit 1d. OSS Rates by Grade show much higher rates at grades 6 through 10 for OSSs of 1 to 10 days and grades 6 through 8 for OSSs over 10 days.

- **1 to 10 Days**. Highest OSS rates were at 6th and 7th grades (17% each). The rates decrease somewhat in 8th and 9th grades (14% each), and again at 10th grade (11%) and 11th grade (8%). Lowest rates are at kindergarten through 5th grade (ranging from 0% to 5%).
- **Over 10 Days.** OSS rates are highest at 8th grade (26%), 6th grade (22%), and 7th grade (19%). Rates are smaller at 9th and 10th grade (each at 11%), and again at 11th grade (8%). Remaining grade rates range from 0 percent to 6 percent.

Exhibit 1d. OSS Rates by Grade

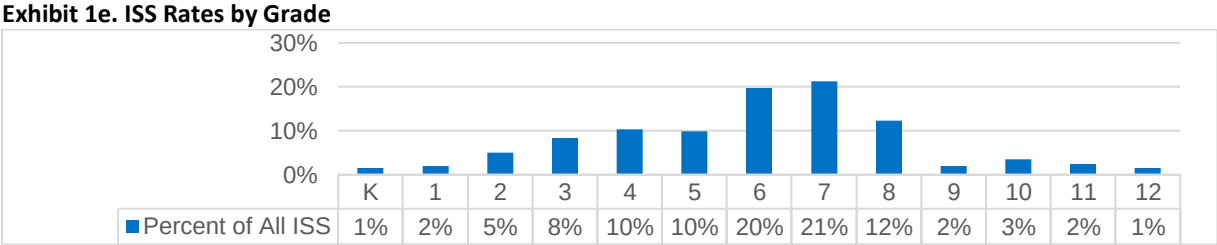


	K	1	2	3	4	5	6	7	8	9	10	11	12
Over 10 Days	0%	0%	1%	1%	1%	4%	22%	19%	26%	11%	11%	3%	1%
1-10 Days	0%	1%	1%	2%	6%	5%	17%	17%	14%	14%	11%	8%	6%

In-School Suspensions (ISS)

Overall, only 0.8 percent of all MPS students received an ISS for 1 to 10 days; students did not receive any ISSs for more than 10 days. Exhibit 1e. ISS Rates by Grade show much higher rates at grade 6 (20%) and grade 7 (21%). Lower but notable rates were at grade 8 (12%), and grades 4 and 5 (10%). Remaining grades had rates ranging between 1 percent and 8 percent.

Exhibit 1e. ISS Rates by Grade



	K	1	2	3	4	5	6	7	8	9	10	11	12
Percent of All ISS	1%	2%	5%	8%	10%	10%	20%	21%	12%	2%	3%	2%	1%

3. MPS Voluntary Agreements with OCR and DHR, and Prior Use of PBIS

The U.S. Department of Education's Office for Civil Rights (OCR) and the MN Department of Human Rights (DHR) each reached voluntary agreements with MPS to address the disproportionate suspension of Black students and SwDs.

MPS and OCR Agreement

The 21-page November 11, 2014 resolution agreement between MPS and OCR did not use the term MTSS; however, the agreement included the development of a plan "to decrease behavioral difficulties that manifest in school and to increase students' ability to benefit from the learning environment." The plan was to include the identification of students at risk for behavioral difficulties, school-based interventions, skill-building, support for school staff, and hiring additional personnel.

MPS and DHR Agreement

The September 25, 2018 voluntary compliance agreement between MPS and DHR addressed suspension disparities of Black and Native American students and SwDs. By agreement the terms ended September 1, 2021. One Fall 2019 progress report from MPS to DHR is notable for its MTSS reference: "Develop tools to support school implementation of the 2019-20 core components in the MTSS Implementation Toolkit: Focus on behavior, SEL, and Tier II academic interventions." A subsequent November 30, 2021 progress report included suspension data reflecting 486 suspensions in 2021-22, with 340 (70%) represented by Black students and almost half of the total (45.3%) represented by SwDs. Relevant to the need for a cross-department and office

approach, the report included the district's plan to:

> Create an MPS specific Diversion Committee in addition to its participation in the city and state Diversion External Committee. The District seeks to engage stakeholders that will include a representative from all defined MPS stakeholder groups which may include but are not limited to representatives from: Positive School Wide Engagement team, Social Emotional Learning team, Equity, Research Evaluation Assessment team, Emergency Management Safety Security team, Associate Superintendents, Social Work team, Mental Health team, Family Engagement team, Indian Education team, Special Education team, Office of Black Student Achievement team, Teaching and Learning team, and Multitiered System of Supports team. (Page 5)

The above plan would have been implemented during the pandemic. Apparently, implementation activities ceased at that time as MPS did not provide any relevant current information and interviewees did not mention their use.

MPS's need to have a robust and collaborative MTSS framework to address student behavior cannot be overstated. To be effective, such collaboration must be inclusive of personnel such as those included in the Diversion Commission referenced above. MPS's current cross-department and office collaboration is described in more detail at Section V.1. District office Administrative Support for Teaching and Learning.

MPS's Prior Use of Positive Behavior Interventions and Support (PBIS)

Reportedly, MPS initiated the tiered PBIS framework about a decade ago, but its work faded for various reasons. According to some there was a belief that PBIS was not sufficiently culturally informed. However, PBIS is not a static program but an MTSS embedded framework with contents that school district personnel design using their selection of curriculum, instructional approaches, and screening tools, etc. In other words, the design of culturally informed practices is based on each school district's chosen components. Instead of addressing this issue directly, PBIS activity within MPS apparently ceased without utilizing any other tiered approach.

Current Practices

MPS schools implementing tiered behavior supports and interventions are doing so based on principal leadership and staff support, including interventionists where available. In recognition of these circumstances, documentation of behavioral referral varies. Interviewees referred to wait lists for mental health services, which PBIS's Tier II includes through community-based wraparound services that consider student and school culture and context, such as:

- Local environments, e.g., neighborhoods and cities
- Personal characteristics, e.g., race, ethnicity, and nationality
- Learning histories, e.g., family, social routines, customs, and experiences
- Language, e.g., dialect and vocabulary

4. Social and Emotional Learning (SEL) and Mental Health Support

As addressed above, equity and school climate personnel (who support SEL) and student support services (SSS) personnel (who support mental and physical health) have individual department-based activities that guide their work. Interviewees shared the following —

- **SEL Curriculum.** Reportedly the equity and school climate department has funded Wayfinder, an SEL curriculum. About half of MPS's schools selected this program and the rest will use it next school year. Other information indicated that in addition to Wayfinder (K-12), the elementary AmazeWorks program is also in use, with some schools layering both curricula and others using one or the other. Equity and school climate staff are exploring other SEL curricula for the secondary level.
- **Developmental Designs and Responsive Classrooms.** These two programs are also designed to support Tier I SEL instruction. Responsive Classrooms is designed to create safe, joyful, and engaging classrooms and school communities and Developmental Designs supports middle-level classroom enrichment.
- **Student Climate Survey.** MPS piloted a student school climate survey for students in grades 3 to 12, which will provide baseline data for school improvement plans and provide feedback about the impact of Responsive Classroom training. The survey was conducted in December, (with a 70 percent participation rate) and will be repeated in May to monitor changes during the year. The summarized results will be shared with school leaders, school staff, students, and families.
- **Social-Emotional Screening.** Currently, MPS does not use a screening tool that addresses social and emotional wellbeing.

Although these SEL programs support universal Tier I instructional approaches, they do not substitute for tiered, targeted, intensive interventions for students with challenging behavior. CASEL's document, Connecting Schoolwide SEL with other School-based Frameworks (which includes reference to PBIS and SEL: Similarities and Differences) shows how these components intersect. As noted in PBIS incorporates SEL, instruction of social-emotional competencies and behavior support within one framework supports systematic, school-wide implementation rather than separate and competing initiatives. (Note: special education department personnel have a high level of expertise in these areas. For example, psychologists do not appear to be fully utilized to support these activities.)

Professional Development

The talent development department, which is housed under the human resources office, oversees districtwide professional development (PD). Individual departments also sponsor content related PD. Interviewees provided feedback that included the following –

- With a small amount of time available for school-based PD, providing access (especially for those who need it the most) is challenging given competing priorities.

- There is a sense of urgency to improve student achievement and sometimes there is a push to change course if improvement is not immediate, rather than scaffolding learning over three years to allow school-based personnel to improve their practices. At times school-based personnel struggle with having a sufficient capacity to absorb large amounts of new learning without time to practice and measure their effects on teaching and learning. Also, when PD is not connected with measuring its impact, the PD's importance is questionable.
- Although some cross-departmental PD occurs, it does not seem to be universally planned in a way that incorporates lenses from all areas of expertise, such as associate superintendents, academics, special education, student support services, equity and culture, multi-language, Black, American Indian, and Latine student achievement, etc. Yet, teachers are expected to integrate information from each of these areas in their instruction. This includes support to schools for, e.g., coaching, mentoring, and other support provided across MPS.
- MPS and union personnel are discussing revisions to the teacher evaluation rubric, conduct of observations, coaching and mentoring, feedback, etc. Aligned PD is necessary to support evaluated instructional areas.
- There is a lack of accountability to ensure that individuals needing and offered PD attend sessions. Anecdotally, 75 percent may be a high estimate for individuals expected at a PD session who actually attended.

Data Reporting

MPS invested in eduClimber, a student data warehouse that imports data from other platforms to create powerful visualizations of academic, behavior, and attendance data. The platform is capable of statistical calculations of growth rate, correlations, risk ratios and also provides a place to house documentation of interventions and other supports students receive, including graphs showing individual student's progress monitoring results. The system also allows for the disaggregation and visualizations of student data by demographics, district, building, grade, classroom, and individual students. Even with this tool, an interviewee suggested that MPS is "data rich and information poor."

The following interviewee feedback reflects several concerns with eduClimber implementation –

- There does not appear to be sufficient district leadership support for the tool beyond its use by the special education department, which relies on eduClimber data to support the evaluation process. For the most part it appears that one individual is spearheading the tools' use, with some support from strategic planning personnel. Academics personnel are not involved, perhaps due to their staffing shortages. The IT department appears to have insufficient staff to support eduClimber as one issue reportedly took 1.5 years to address.
- EduClimber and Infinite Campus data inconsistencies are not corrected, e.g., attendance, etc., which would require one or more individuals having responsibility for this purpose.
- An issue regarding progress monitoring and graphing was corrected going forward, but prior

data is not available. Action is underway to migrate iReady data into eduClimber.

Recommendation 1. Actualize MPS's Board Policy 6121 to "adopt a system of supports, interventions and trauma-based care to address academic, social, emotional and behavior needs of students who are at risk of not meeting state proficiency standards."

To transform MPS's Board Policy into practice expedite completion of a comprehensive MTSS framework and guide that full incorporates all elements of the board policy. To carry out Recommendation 1 multiple actions at the district level must occur and involve all personnel involved with teaching and learning at the district, associate superintendent, and school levels carrying out their respective responsibilities. *This work must reflect a sense of urgency among all stakeholders to improve all achievement for every student.*

a. Personnel Alignment to Support MTSS

As a first action, improve communication, collaboration, and support to schools by considering the suggestions below. Additional personnel alignment recommendations also are included in the following sections: II. Disability Demographics and Eligibility; IV. Support for SwD Achievement and Wellbeing; V. Administrative and Operational Support for SwD Teaching and Learning; and VI. Special Education Compliance and Operations; and VII. Shared Accountability for Results.

- **Broader Deputy Superintendent Role.** Have the deputy superintendent take on a broader role with direct reporting by the Senior Academic Officer (SAO). Also, continue to include the SAO on the superintendent's executive leadership team. This recommendation is not intended to decrease SAO and superintendent contact or reduce the SAO's contribution to the team. Rather, it is to have a single reporting line for all personnel areas supporting teaching and learning.
- **New MTSS Director Position.** With this broader role, have an MTSS director with a direct report the deputy superintendent. Expedite establishing a position (and hiring an individual) at a level commensurate to this districtwide responsibility for leading and project managing MTSS framework development, implementation, planning, and monitoring. (This position is referred to as MTSS director for purposes of these recommendations.) If feasible, expeditiously assign an interim MTSS director to carry out this work. Include the MTSS director position in the MPS organization chart.

  As a direct report to the deputy superintendent, authorize the director to reach personnel in all departments and offices with responsibilities directly and indirectly supporting teaching and learning. Rather than having direct supervision for these personnel, the MTSS director's responsibility requires the ability to bring these individuals together and project manage this work with appropriate staffing support.

1. **Personnel Supporting Positive Behavior, SEL, Mental Health, and Physical Health.** Strengthen partnerships between all academic departments, student support services,

and equity and culture to optimize support for all students. (Note: as posted on the School Nurse Association Mental Health webpage, school nurses are frontline healthcare professionals who frequently are the first school staff to identify students with symptoms of stress, anxiety, depression, and other behavioral health challenges. They collaborate with other school healthcare professionals and community providers to support upstream approaches to improve the mental wellbeing of students.)

b. MTSS Leadership Teams

Establish leadership teams at the district, associate superintendent, and school levels to support MTSS planning, and oversight of activities described in the implementation plan below. (Note: a current districtwide leadership team may be used for this purpose.)

- **District MTSS Leadership Team.** Under the deputy superintendent's direction, identify and include team members who represent all departments and offices with personnel directly and indirectly supporting schools, personnel, and students to improve teaching and learning (including behavior and social-emotional supports). In addition, consider the Diversion Commission members referenced in the MPS/DHS voluntary compliance agreement, such as safety and security representatives. Consider whether the current Instructional Leadership Team (ILT) with some additions could carry out this role.
- **Associate Superintendent Leadership Teams.** Have each associate superintendent establish a leadership team for their portfolio of schools. Have these teams include representatives from schools and district office staff who support schools to collectively review their respective schools' data, plan support, and provide PD for principals and school staff with common needs, etc. Have each MPS department and office identify such individuals to support each associate superintendent for these purposes.

c. Data Review

Review data for achievement, graduation, OSS, and ISS, including but not limited to above Exhibits 1a through 1e. In addition, review data for students with and without IEPs who based on screening data are at high risk of not meeting MCA standards. Consider the extent to which students with and without IEPs overlap and may have similar general education instructional needs. Use learning from this review to inform implementation planning.

d. Implementation Plan

Have the district MTSS leadership team oversee drafting an implementation plan that clearly describes MPS's expectations for MTSS practices and monitoring of their implementation. (Note: action items under this heading require investigation, discussion, and decision-making about matters that may require developing additional written guidance, etc.)

Have the MTSS director facilitate implementation planning with individuals across departments and offices. For example, have representatives who reflect the district leadership team's diversity develop MPS's approach for supporting positive behavior. Also consider –

- Hiring a short-term expert consultant to support this process and/or contacting the **SWIFT Center** for assistance.
- Have the plan ready for a 2025-26 school year launch.
- Have an MTSS kickoff event to celebrate and share information about the launch.
- Post the implementation plan on the district's website and make links publicly available.
- Include in the plan actions related to the areas addressed below: data; written guidance and information; resource mapping and filling gaps; differentiated PD; data analysis and reporting; and monitoring and accountability.

Follow this process to plan implementation for the following recommendations. For Recommendation 1, plan actions such as the following –

- **Draft Comprehensive MTSS Framework and Implementation Plan Feedback.** Obtain feedback from school communities about the draft, including support they will need to implement it.
- **MPS Instructional Vision.** Develop a shared district instructional vision that describes effective classroom expectations, practices and elements of pedagogy for quality core instruction in content areas. During this process, enlist representative staff from all district departments who support school-based associated instruction (including special education and multilingual learners/EL, etc.) to ensure all students' experiences are valued, heard, and represented.
- **Mathematics Instructional Programs.** Review these programs for preK-12 to ensure they are consistent with the district's vision.
- **Native American Materials.** Explore culturally appropriate ELA materials.
- **SIOP Classes.** Address appropriateness of SIOP classes for students and the limitations they may introduce for ensuring students have access to rigorous grade level content and courses.
- **Support for Tiered Interventions.** With upcoming budget considerations, explore ways interventionist positions (or those of other knowledgeable personnel) can be increased to support schools.
- **SwDs and EL Students.** Address the provision of core instruction and tiered interventions that will enable SwDs and EL students to benefit, such as with the use of universal design for learning (UDL), scaffolding, and differentiated practices.
- **Interventionists.** Clarify the roles of interventionists (and other similar positions) to improve integration of intervention practices across academic, behavior, and social-emotional learning domains. Provide models for scheduling interventions to reinforce the expectation that they supplement, and do not supplant, core instruction.
- **SEL and Support for Positive Behavior.** Consider the connection between these areas and embed components for both in the developing MTSS framework. See, e.g., CASEL's

document, PBIS and SEL, and PBIS incorporates SEL. In addition to websites for PBIS and Safe and Civil Schools, see this document for an example of useful school information. Also incorporate equity and school climate considerations as well as restorative practices.

- **SEL Screening Tool.** Consider concerns that have been expressed about the use of an SEL screening tool and how these concerns can be addressed.
- **Funding Barriers.** Investigate areas with restrictive funding sources that have prevented collaboration and support for MTSS activities, e.g., psychologists involvement. See, for example, Leveraging Resources: Blending and Braiding Funds to address this challenge.
- **Family Friendly Implementation Plan**. Develop a user-friendly family version of the implementation plan and translate the document in MPS's most common languages.
- **Communicate.** Maximize channels for communicating district MTSS success with stakeholders, e.g., MPS website, social media, etc.

e. Written Guidance and Expectations

Based on district documents, along with additional information relating to behavior and social-emotional wellness, expedite the development of a comprehensive, user-friendly MTSS implementation guide to support understanding the district's framework and implementation expectations. Have the guide tell the broad story of MTSS with links to more detailed information. For example, consider the SharePoint documents shared with the SST. For each document relevant to an aspect of the MTSS implementation guide, briefly summarize its contents and link the document.

Publish the guide on the district's website for easy access and public transparency. Also, make all guide links publicly available. For example, see MTSS implementation guides developed by Miami-Dade County Public Schools (along with its principal companion) and by the Broward County Public Schools. Use the guide as the foundation for training (from district office to schools). As issues and questions arise, amend the guide with notice to the field about changes.

- **MTSS Leadership Team Expectations.** Describe team expectations at the district, associate superintendent, and school levels. See guidance documents for district leadership teams and school-based teams here and for Palm Beach County School District here, including expectations for their presence at every school. For associate superintendent leadership teams describe their roles and composition, expected meeting frequency, etc. For example, have the team gather information from school teams to identify common issues to inform support and PD, and provide feedback to the district team about successes and challenges beyond the associate superintendent's capacity to resolve.
- **Expected and Discretionary Practices.** Identify expected practices showing a high relationship to improved achievement, behavior, and social-emotional wellbeing, and that will be monitored. These include expected core instructional practices, tiered interventions, and documentation expectations for students prior to initiating a special

education evaluation, etc. (Note: support expected practices with appropriate material and human resources with mandatory PD for students and staff to be successful.) Clarify that interventions are available for students new to the district who lack complete and timely IEP 504 plans. Also, identify useful practices that will not be monitored.

- **Supplemental Tiered Interventions.** Reinforce the message that tiered interventions are to supplement and not supplant core instruction. Students cannot be expected to improve their MCA achievement when not taught material tested.
- **Problem solving.** Reintroduce the problem-solving model and describe its research-based process.
- **SwDs Involvement.** Reinforce that SwDs have the right to participate in general education MTSS interventions that are beneficial, even though they have IEPs.
- **SDI.** Explain how specially designed instruction (SDI) is embedded within and supplements the MTSS framework.
- **Sufficient Support.** Develop, implement, and monitor the implementation of strategies for providing school personnel with sufficient support for reading and math core instruction, tiered interventions, and support for positive behavior and SEL.
- **MPS Strategic Plan.** Embed MTSS principles for academics, SEL, and positive behavior support in the MPS strategic plan goals. (See Section VII. Shared Accountability for Results at Recommendation 8 for additional information.)

f. Map Material and Human Resources, Analyze, and Fill Gaps.

Supplement Recommendation 1e and subsequent actions with the additional areas identified below for resource analysis –

- **Review.** Have the district MTSS leadership team review current material and human resources for literacy and math core instruction, targeted and intensive interventions, and behavior and SEL to identify gaps and materials without evidence of improvement.
- **Implementation.** At beginning of SY 2025-26 meet material resource gaps with phased-in removal and replacement of ineffective materials. To the extent possible provide schools with the human support they need to improve their practices.

g. Differentiated PD

Ensure all district office and school-based personnel having direct and indirect support for teaching and learning receive information they need to implement written guidance and expectations and associated evidence-based practice. Consider information about trauma-informed instruction. See CGCS's Advancing Instruction and Leadership in the Nation's Great City Schools – A Framework for Developing, Implementing, and Sustaining High-Quality Professional Development, which provides a core set of criteria for high-quality PD.

Given MPS's competing priorities for PD, MPS leadership (with maximum collaboration across district offices) must give considerable thought to how PD will reach all school based personnel for them to learn the draft Literacy and Math Guidance and expanded with the SEL

and Behavior Multi-layered Practices Guidance with finalized Social-Emotional contents. As part of PD, reinforce core instructional practice requirements and use of interventions for supplementary purposes only. This is also true for supplementary SDI for students participating in MCA assessments. See, for example, Broward County Public Schools' comprehensive Elementary Learning Master Plan. (Note: Dr. Nicole Mancini, the Council of the Great City Schools' chief academic officer, led the Master Plan's writing. She is available to brief district staff members on the purpose of the document and how it guides the district's professional learning implementation and evaluation process.)

Based on the developed MTSS framework, implementation plan, and written guidance and information, incorporate into the district's PD program information targeted to each audience, e.g., district office personnel, principals, assistant principals, general and ESE educators, EL teachers, related-services personnel, SEAs, family, etc. To the extent possible, provide over the next few years at least four to five days each year of training for school-based leadership teams. Consider how training will be budgeted, e.g., through stipends, funds for substitute coverage, incentives for after-school and Saturday training, summer training, etc. If feasible, plan for a summer boot camp to initiate training.

As part of this process, consider -

- **Competing PD.** How to address competing priorities for PD time.
- **Associate Superintendent and Principal Meetings.** Have discussions about how general educators can use instructional strategies appropriate for educators of low achieving students with and without IEPs and EL students.
- **Gusky's Evaluation of PD.** Build on the district's work in this area to improve PD benefits.

Also address the following here and in subsequent recommendations that concern PD –

- **Sharing Knowledge.** Crosstrain personnel from multiple departments to support the use of common language and understanding of MTSS. Such training will help to increase the number of knowledgeable personnel able to assist schools with implementation and provide training.
- **Presenters.** Use knowledgeable and experienced staff members at district, associate superintendent, and school levels to support MTSS training. As necessary, supplement these staff members with experts outside the school district.
- **PD Engagement.** Ensure PL is engaging and differentiated based on audiences' skill levels and need. Continue PL for new personnel and those needing additional support.
- **PD Approaches.** Use multiple PL models (e.g., videos, webinars, and narrative text) and presentation approaches (e.g., school-based, small groups).
- **Walkthroughs.** Supplement walkthrough protocols, as needed, with additional MTSS framework provisions. Use a diverse group of team members that include the associate superintendent, principal, and representatives from areas such as special education and EL. Where possible, include student group offices. Have district and associate superintendent leadership teams review walkthrough results to identify relevant trends,

strengths, and action items. Use electronic tablets, to the extent possible, to support this process to generate data showing observation trends. Ensure school-based leadership teams review their school walkthrough results.

- **Sharing Best Practices.** Have forums for schools to highlight and share best practices, lessons learned, victories, and challenges overcome during MTSS implementation for all students (including gifted, EL, special education, ELwD). Identify by region exemplary schools and enable staff from other schools to visit.

h. Data Analysis and Reports

Consider the following to inform follow-up action –

- **Implementation Team.** Form a team to improve data collection and reporting. Have their plan include the team's oversight of data integration, intervention tracking, and training for platforms like EduClimber, iReady, and any other data systems. Include members from information technology (IT) and content users (academics, special education, EL, student support services, and other departments) for holistic planning and to optimize use of data systems.

  Also, have the plan address the following –

  - Effective implementation of eduCLIMBER.
  - Seamless integration of platforms (like FastBridge, iReady, and others) into EduClimber, with nightly syncing and IT oversight.
  - Consolidation of data spread across various platforms (Google Docs, DNA, EduClimber, etc.) into one unified system and reduce redundancy with increased data migration.
  - Review of SwD progress monitoring on EdPlan platform and EduClimber.
  - Unified reporting, as possible, to make data accessible for all teachers and related service providers educating SwDs.
  - District office, associate superintendent and school level reporting of OSSs and ISSs for students with and without IEPs, highlighting schools with rates contributing to disproportionate suspensions of Black and American Indian students.
  - Audit of current platforms (e.g., DNA, Star, EduClimber, FastBridge, etc.) to determine which are essential and eliminate underutilized or redundant systems. Consider the eduCLIMBER platform as a possible tool for executing all components of MTSS, but particularly the Infrastructure and Data-based Decision-Making components.
  - Consideration of how EduClimber can be more user-friendly.

- **Dedicated Support Roles.** Reduce reliance on staff serving dual roles (e.g., technical and MTSS implementation) by hiring dedicated EduClimber support personnel. This would enable consistent monitoring of data flow, troubleshooting issues, and ensuring consistent access to up-to-date information, e.g., reconciling data inconsistencies between EduClimber and Infinite Campus, etc.

- **Data Transparency.** Prioritize the creation of data dashboards for key stakeholders (principals, teachers, interventionists) to easily access academic and behavioral data.
- **Summary Reports.** Share these with pertinent district administrators, associate superintendents, and principals.

i. Monitoring and Accountability

Based on written expected practices, e.g., progress monitoring and documentation, etc., clearly identify accountability expectations and relevant key performance indicators (KPIs) to monitor implementation at the district, associate superintendent, and school levels. Follow this process with other recommendations involving monitoring and accountability provision. Include the following as part of this process –

- **MTSS District Leadership Team Review.** Establish a process for the team to receive and review KPI results.
- **Tiered Support.** Based on monitoring results, establish tiers of school support to focus district and associate superintendent attention to those schools with the greatest needs, e.g., Transition Schools, etc. (As part of this process, consider schools with lowest achievements, highest special education noncompliance, critical vacancies, substitute shortages, etc.) Consider the human resources necessary for this purpose.
- **SAM.** Establish expectations for schools' use of the Self-Assessment of MTSS Implementation (SAM) guide. Embed this process and school results in instructional leadership team visits and other instructional walk throughs.
- **MTSS Feedback.** Design feedback loops involving district and regional leadership teams, school personnel, families, and the community to celebrate successes and review challenges. Provide regular and timely feedback to the district MTSS leadership team about barriers beyond associate superintendent and school control.

II. Disability Demographics and Eligibility

The information discussed above related to MPS's implementation of MTSS has direct implications for decisions to evaluate and qualify students for special education. When implemented as intended, students benefit from high quality core instruction, increasingly intensive interventions, and progress monitoring that reflects progress. When MTSS practices are not well implemented it is more likely that special education will be relied upon for students achieving below their same age peers. These circumstances also influence disproportionate eligibility decisions associated with race/ethnicity, and for EL students when appropriate resources are unavailable for this population.

The information below pertains to the following areas –

A. Disability Demographics by Various Indicators

B. Written Information about Referrals, Evaluations, and Eligibility Determinations

C. Section 504 Qualification

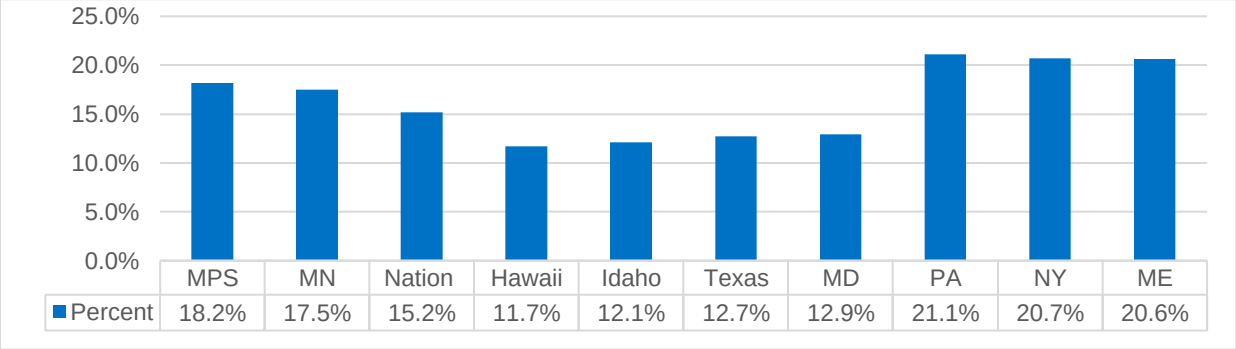
Disability Demographics by Various Elements

This section summarizes MPS disability data by various indicators to provide a context for this diverse group of students.[4] The following disability demographics address all SwDs; the most common disability areas overall, by race/ethnicity and gender; and English learner (EL) students. Such disaggregation of data shows differences that overall rates mask.

1. Overall SwD Rates and by Most Common Disability Areas

As shown in Exhibit 2a. Overall ESE Rates, based on MPS October 1, 2024, shared data, a larger percentage (18.2%) of MPS students have IEPs compared to the state (17.5%) and nation (15.2%).[5] Nationally, MPS rates were lower than three states: Pennsylvania (21.1%), New York (20.7%), and Maine (20.6%). States with the lowest rates were Hawaii (11.7%), Idaho (12.1%), Texas (12.7%), and Maryland (12.9%). The MDE Report Card (February 22, 2024) reflected a larger MPS special education rate of 18.7 percent.

Exhibit 2a. Overall Special Education Rates



Interviewee Feedback

Several issues raised by interviewees are notable –

- **Initial Special Education Evaluations.** Staff are studying initial evaluations as part of the district's Strategic Plan; however, our review of shared information did not reflect this activity. While there is a stated perspective that special education evaluation referrals should generally occur only after a student's receipt of MTSS components (core instruction, increasingly intensive interventions, problem-solving, progress monitoring, etc.), this preferred precondition is only as effective as MTSS's implementation.
- **Parent Request for Evaluation.** There is an apparent belief that MDE requires school districts to evaluate a student upon parent request, which has caused some teachers to ask parents to initiate the request. However, neither MDE nor MPS (at page 5) requirements include this

[4] MPS shared 2023-24 data (as of May 15, 2024). Federal and state data is based on the 2022-23 school year, which is the latest available.

[5] MPS's figure is based on October 1, 2024 data shared with the SST; state and U.S. figures are based on 2022-23 National Center for Education Statistics data.

mandate. Both procedures follow the federal IDEA rule, which MDE explains as: Once a school district receives a verbal or written request from a parent for a special education evaluation, the district must either accept or reject the request by providing the parent with written notice following the procedures outlined in IDEA at 34 C.F.R. § 300.503.

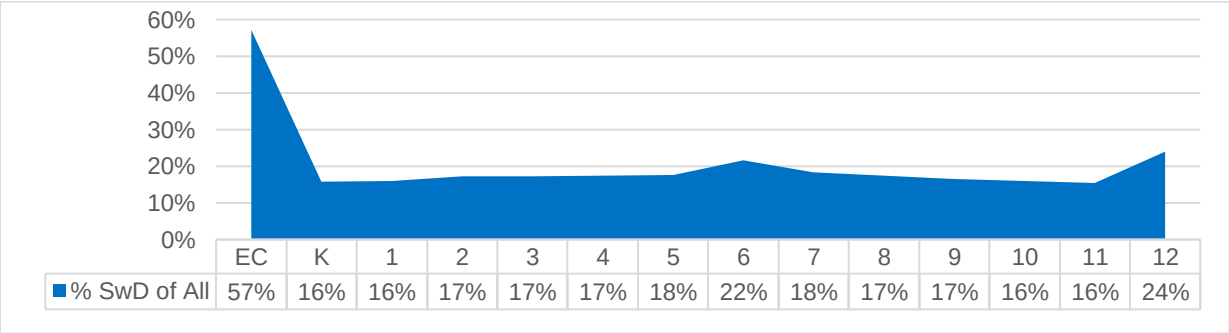
2. All Disabilities and Most Common Disabilities by Grade

Information in this section shows the composition of SwDs by grade, and then most common disability areas by grade. This information shows disability proportion changes as students age and how personnel must adapt.

MPS Disabilities by Grade

Data in Exhibit 2b. MPS Disability Rates by Grade show early childhood children (ages 3 through 5, but not in kindergarten) had the highest rate (57%), which reflected the smaller number of students without disabilities enrolled at these ages. Rates for K-1st grade (16%) and 2-4th grade (17%) remained steady. The rate increased slightly at 5th grade (18%) and jumped at 6th grade (22%) before falling in 7th grade (18%). Rates remained smaller at 8th and 9th grades (17% each) and 10th and 11th grades (16%). The 12th grade rate (24%) was higher likely due to students who remain in school for secondary transition activities and services.

Exhibit 2b. MPS Disability Rates by Grade



	EC	K	1	2	3	4	5	6	7	8	9	10	11	12
% SwD of All	57%	16%	16%	17%	17%	17%	18%	22%	18%	17%	17%	16%	16%	24%

3. Most Common Disability Demographics

Information in this section shows MPS most common disability areas compared to the state and nation, and for MPS by grade.

MPS Most Common Disability Area Rates

Data in Exhibit 2c. Rates by Most Common Disability Area compares MPS to US figures. IDEA disability terms and their abbreviations, followed by those MDE/MPS use are: ASD (autism spectrum disorder); specific learning disability (SLD), which includes students needing alternative program (SNAP); speech/language impairment (SLI), which includes SLI-fluency (SLI-FL), SLI for articulation (SLI-AR), SLI for language (SLI-LD); other health impairment (OHI) (known as other health disability (OHD) in MN); developmental disability (DD); emotional disability (ED) [known in MN as emotional/behavior disability (EBD); and intellectual disability (ID), [known in MN as developmental cognitive disability (mild/moderate-MM and severe/profound SP)].

MPS rates are higher than MN and/or US in the following areas –

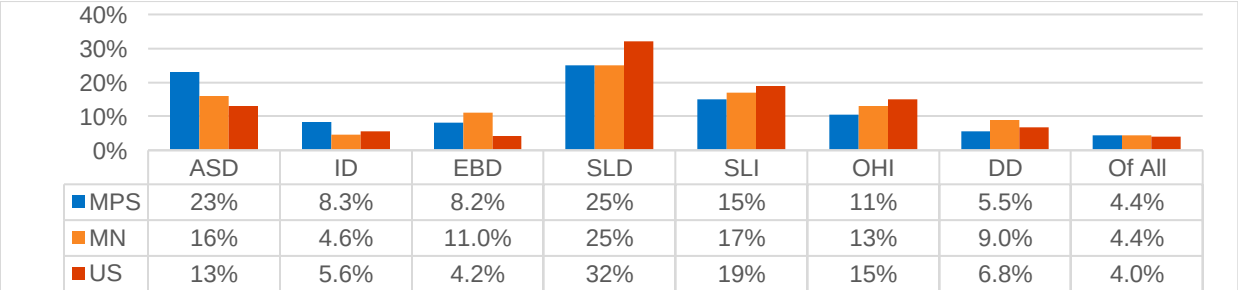
- **ASD.** The most disparate MPS area, MPS's autism rate (23%) is much higher than MN (16%) and US (13%) rates.
- **ID.** MPS's rate (8.3%) is higher than MN (4.6%) and US (5.6%) rates.
- **ED.** MPS's rate (8.2%) is almost twice as high as the US rate (4.2%), but lower than MN's rate (11%).

Areas with MPS rates lower or the same as state rates and lower than US rates follow –

- **SLD.** MPS's rate is the same as MN's rate (25%), both of which are much lower than the US rate (32%).
- **SLI.** MPS's rate (15%) is closer to MN's rate (17%) than the US rate (19%).
- **DD.** MPS's rate (5.5%) is lower than MN (9.0%) and US (6.8%) rates. This difference may be due to the state's lower age cap for this group (7 years compared to the federal 9-year cap).

The above disabilities comprise about 95 percent of all disability areas. MPS's rate for all other disabilities (4.4%) is the same as MN's rate (4.4%) and about the same as the US rate (4.0%).

Exhibit 2c. Most Common Disability Area Rates



	ASD	ID	EBD	SLD	SLI	OHI	DD	Of All
MPS	23%	8.3%	8.2%	25%	15%	11%	5.5%	4.4%
MN	16%	4.6%	11.0%	25%	17%	13%	9.0%	4.4%
US	13%	5.6%	4.2%	32%	19%	15%	6.8%	4.0%

Selected Disability Areas by Grade

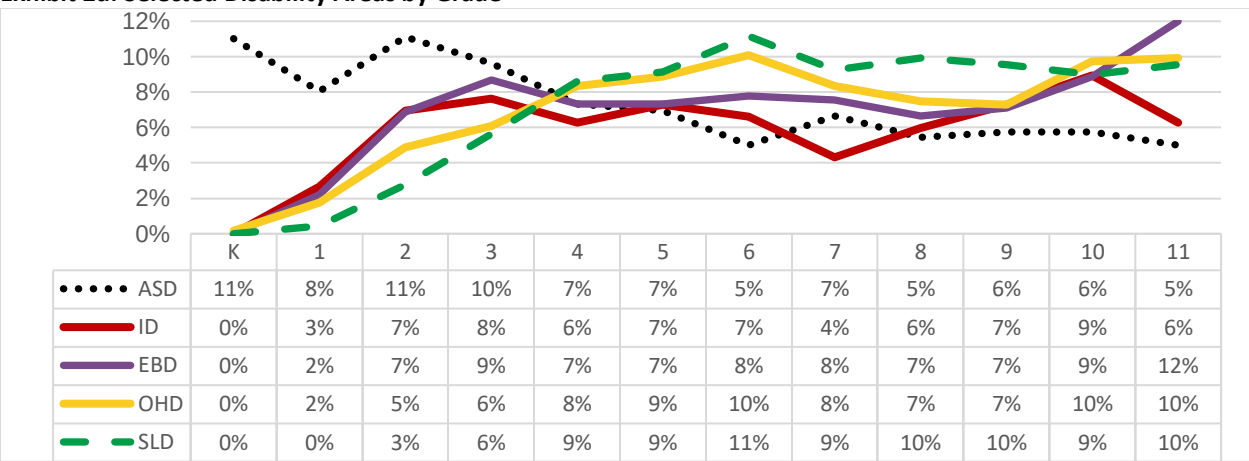
Exhibit 2d. Selected Disability Areas by Grade shows the proportion of ASD, ID, EBD, OHD, and SLD by grade. Note the third grade rate increases may be related somewhat to students with a DD disability who age out at 7 years.

- **ASD.** From kindergarten (11%), the rate fell at 1st grade (8%) and increased again at 2nd grade (11%) and 3rd grade (10%) when it peaked. Between 4th and 11th grade the rate ranged between 7% and 5%). Higher rates at the lower grades will likely impact service demands as students age.
- **ID.** The 1st grade rate (3%) increased at 2nd grade (7%) and 3rd grade (8%). Until 11th grade rates fluctuated, typically 6 percent and 7 percent, with a low at 7th grade (4%) and high at 10th grade (9%).
- **EBD.** Similar to ID, the 1st grade rate (2%) increased at 2nd grade (7%) and 3rd grade (9%). Rates then fluctuated through 9th grade (7% to 8%), increased at 10th grade (9%), and then jumped

at 11th grade (12%).

- **OHD.** The 1st grade rate (2%) increased at 2nd grade (5%) and 3rd grade (6%). Rates then fluctuated through 11th grade (between 7% and 10%).
- **SLD.** Grade 2, the first with enough students to calculate a rate (3%), doubled in 3rd grade (6%), and jumped again in 4th and 5th grades (each at 9%), and 6th grade (11%). Rates between 7th and 11th grade fluctuated (between 9% and 10%).

Exhibit 2d. Selected Disability Areas by Grade



	K	1	2	3	4	5	6	7	8	9	10	11
ASD	11%	8%	11%	10%	7%	7%	5%	7%	5%	6%	6%	5%
ID	0%	3%	7%	8%	6%	7%	7%	4%	6%	7%	9%	6%
EBD	0%	2%	7%	9%	7%	7%	8%	8%	7%	7%	9%	12%
OHD	0%	2%	5%	6%	8%	9%	10%	8%	7%	7%	10%	10%
SLD	0%	0%	3%	6%	9%	9%	11%	9%	10%	10%	9%	10%

SNAP and SLD

MDE authorizes two methods for determining SLD –

- **Severe Discrepancy Criteria.** Under this option a student's intellectual ability is compared to their academic achievement, using a minimum 1.75 standard deviation measure.

  PSM/SNAP Process. This problem-solving model (PSM) uses progress monitoring data to determine below grade-level performance, lack of response to well-designed interventions, and a weakness in a basic psychological process that is consistent with low achievement. Also known as response to intervention (RtI), the process depends on MTSS implemented with fidelity. Reportedly, MPS uses the term "SNAP," which stands for students needing an alternative placement, to refer to the waiver MDE approved (in about 1993) for the district's use of its RtI model as an option for SLD qualification consideration. MPS developed the SNAP model to address an Office for Civil Rights (OCR) finding related to disproportionately high rates of Black students with IEPs. After IDEA's 2006 SLD regulation, MDE, in 2023, amended its rule to allow an alternative SLD criteria in addition to the discrepancy criteria. The state's new SLD criteria, which is based on scientific research-based interventions (SRBI), is more specific than the MPS requirement for SNAP. (Note: MPS continues to report students under the SNAP category in addition to SLD.)

  MPS's new criteria requires finding an **inadequate rate of progress (ROP).** (Note: these criteria are similar to those used in MTSS guides addressing ROP.) Using intensive SRBI measures, progress monitoring measures ROP over time, either before referral or during the

special education evaluation. To establish ROP there must be a minimum of 12 data points from a consistent intervention implemented over at least seven school weeks. ROP is inadequate when the –

- ROP is minimal and continued intervention will not likely result in reaching age or state-approved grade-level standards;
- Progress will likely not be maintained when instructional supports are removed;
- Performance level in repeated achievement assessments falls below the child's age or state-approved grade-level standards; and
- Achievement level is at or below the fifth percentile on one or more valid and reliable achievement tests using either state or national comparisons. Valid and reliable local comparison data may be used in addition to state and national data. If local comparison data differs from state and national data the group must explain the difference.

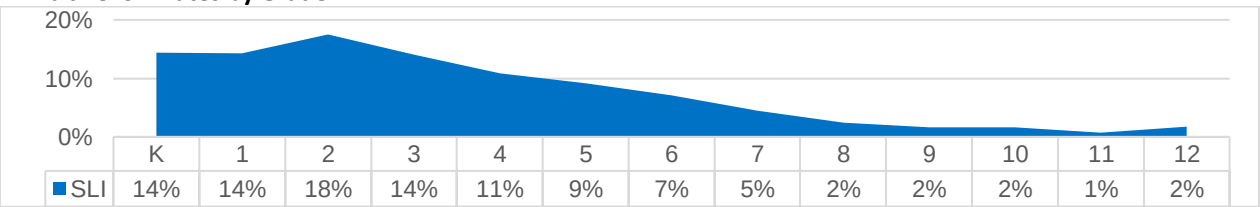
According to MPS's SLD Identification Procedures, in 2023-24 MPS began to use the state SRBI SLD criteria for initial evaluations for students in kindergarten through grade 8 in reading, and the SLD discrepancy criteria for initial qualification in the areas of math, writing, and grade 9-12 reading.

When the SRBI process does not show a student received appropriate research-based intervention and progress monitoring to justify use of the criteria, evaluators will use the discrepancy model, which MPS personnel sought to avoid after finding it is less useful for non-White students. Reportedly, when this occurs it is unclear what action is taken at the local school to address this circumstance. MDE's SRBI criteria further reinforces MPS's need to implement MTSS with fidelity.

SLI by Grade

Data in Exhibit 2e. showing SLI Rates by Grade reflected high rates at kindergarten and 1st grade (14% each), increased at 2nd grade (18%), and then began to decrease at 4th grade through 7th grade (11% to 5%). The rates from 8th through 12th grades remained low (2%) except for a small decrease at 11th grade (1%). This declining rate pattern is typical for school districts with which we have experience.

Exhibit 2e. SLI Rates by Grade



	K	1	2	3	4	5	6	7	8	9	10	11	12
SLI	14%	14%	18%	14%	11%	9%	7%	5%	2%	2%	2%	1%	2%

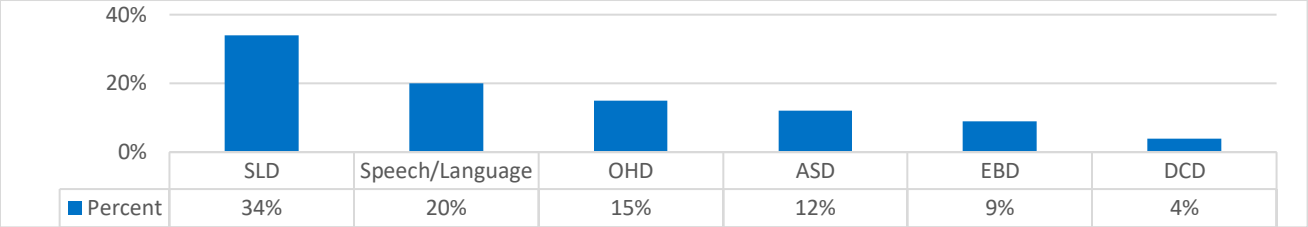
4. Initial Evaluation Results

MPS shared data regarding the results of initial special education evaluations. That data reflected 87 percent of the 585 initial evaluation referrals in 2023-24 resulted in student qualification. This rate is within those we have seen from other school districts with which we have experience.

Initial Evaluation Disability Rates

Data in Exhibit 2f. Initial Evaluation Disability Rates show the most common eligibility applies to the areas of SLD (34%) and speech (20%), followed by OHD (15%), ASD (12%), EBD (9%), and DCD (4%). The remaining areas comprise 6 percent of the total initial eligibilities.

Exhibit 2f. Initial Evaluation Disability Rates

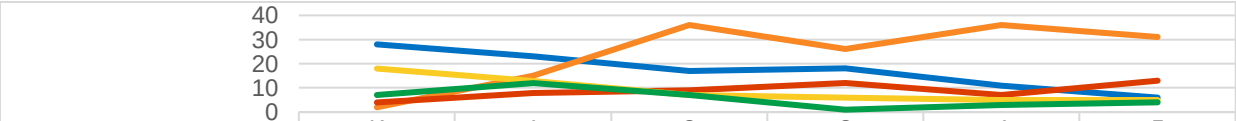


Initial Disability Qualification by Grade

Of the 473 students found to be eligible for special education based on the most common disability areas, 84 percent were in grades K through 5. Exhibit 2g. Disability Qualification by Grade show the distribution for the five highest disability areas.

- **Speech/Language.** Following typical trends, figures are higher in the lowest grades (between 28 and 18 students) and decrease at 4th grade (11 students) and 5th grade (6 students).
- **SLD.** Typical figures are highest beginning at 2nd grade (36 students) and range between 5th grade's 31 students and 3rd grade's' 26 students.
- **OHD.** Highest figures are at 3rd grade (12 students) and 5th grade (13 students). Otherwise, the figures range between 4 students in kindergarten and 9 students in second grade.
- **ASD.** Highest figures are at kindergarten (18 students) and 1st grade (13 students). Otherwise, figures are low, ranging between 5 and 7 students.
- **EBD.** With most students identified at 1st grade (12 students), the remaining figures are low, ranging from 1 to 7 students.

Exhibit 2g. Disability Qualification by Grade



	K	1	2	3	4	5
Speech/Language	28	23	17	18	11	6
SLD	2	15	36	26	36	31
OHD	4	8	9	12	7	13
ASD	18	13	7	6	5	5
EBD	7	12	7	1	3	4

5. Disability by Race/Ethnicity

The risk ratio measure shows the likelihood that a group of students (e.g., Hispanic, etc.) has a characteristic (e.g., disability, etc.) compared to all other student groups (e.g., non-Hispanic, etc.). A risk ratio of "1" reflects zero risk for the selected group compared to all other student groups. The information below shows race/ethnicity risk ratios for all SwDs and by several disability areas.

MDE Finding of Significant Discrepancy

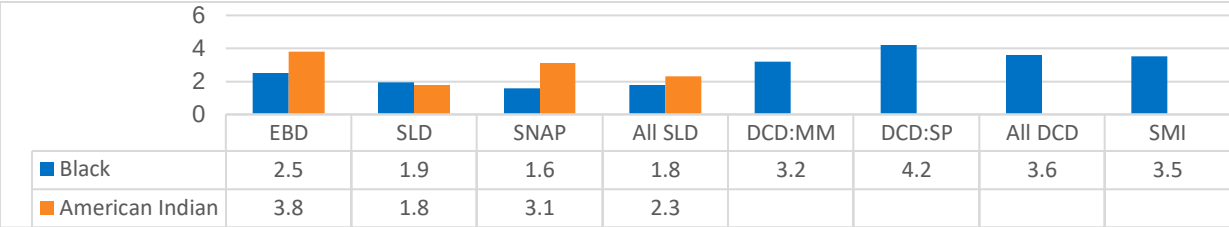
On March 1, 2024 MDE notified the district that its risk ratio (rr) for Black students with a developmental cognitive disability (DCD) exceeded the state maximum in 2023 (3.340 rr) for a second year after 2022 (3.003 rr). MDE's definition of significant disproportionality for identification requires a risk-ratio that exceeds 3.000 for three consecutive years based on SwDs from 3 to 22 years of age. Minnesota districts can show they have made reasonable progress toward reducing disproportionality by submitting information showing one of the following: 1) a .20 reduction in the risk ratio; 2) students were identified by another district; or 3) use of evidence-based practices for identification, training provided, fidelity of practices, and outcomes. Note: in practice, a risk ratio of 2.0 (a student group is twice as likely as other student groups to reflect the characteristic in question) should raise concern and prompt follow-up action.

Disability by Race/Ethnicity

Exhibit 2h. MPS Disability Risk Ratios for Black and American Indian Students presents figures for disability areas with a component area or total disability risk ratio of 2.5 or higher.

- **Black SwDs.** Risk ratios were 3.2 for DCD/MM; 3.5 for severe/mental impairment (SMI); 4.2 for DCD/SP (4.2). The risk ratios for SMI and DCD/SP are unusual as typically disability areas representing students with the most significant (or obvious) disabilities tend to have low risk ratios compared to more judgmental disabilities, such as EBD. For this latter area, EBD's 2.5 risk ratio raises concern.
- **American Indian.** Two risk ratios over 3.0 were for EBD (3.8) and SNAP (3.1). Including SNAP in the broader SLD category the risk ratio fell to 2.3.

Exhibit 2h. MPS Disability Risk Ratios for Black and American Indian Students



6. Disability by Race/Ethnicity and Male/Female

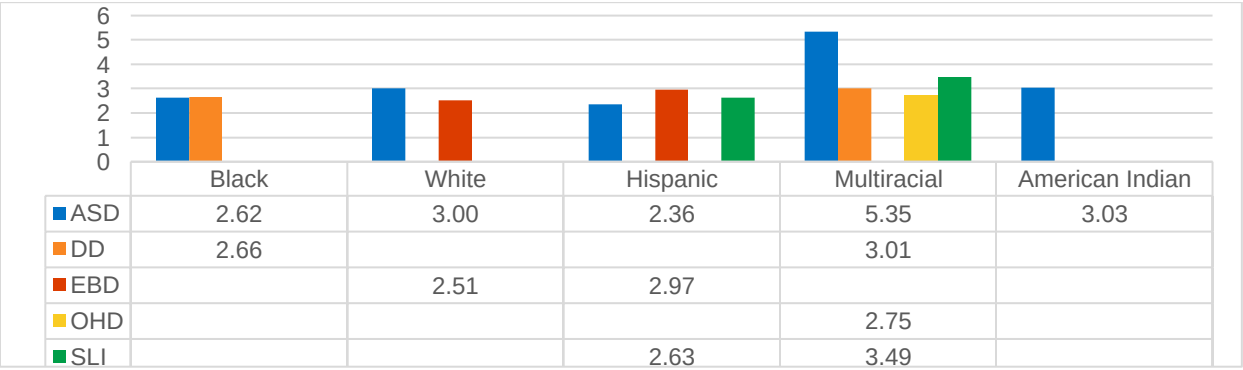
By various measures, male MPS students have higher SwD rates compared to females. Of all MPS SwDs, 65 percent were male. Of all male students, 23 percent have IEPs compared to 13 percent of all females. When data is disaggregated by race/ethnicity, disability, and male/female the disproportionalities are more evident. Note: data for all students included the nonbinary category (132) with White students comprising this largest group (79%), followed by American Indian students (9%). Comparable data was not shared for SwDs.

Risk Ratios for Males to Females by Disability Area and Race/Ethnicity

Exhibit 2i. Risk Ratios Over 2.5 for Males to Females by Disability Area and Race/Ethnicity shows-

- **ASD.** Risk ratios were above 2.5 for each racial/ethnic group of SwDs. With a risk ratio of 5.35, multiracial male SwDs were more likely than others to have ASD. The following high-risk ratios applied to American Indian (3.03), White (3.00), Black (2.62), and Hispanic (2.36) students.
- **DD.** Multiracial male SwDs had the highest risk ratio (3.01) followed by Black SwDs (2.66).
- **EBD.** Hispanic male SwDs had the highest risk ratio (2.97), followed by White SwDs (2.51).
- **OHD.** Multiracial male SwDs were alone in this category with a risk ratio of 2.75.
- **SLI.** Multiracial male SwDs had the highest risk ratio (3.49), followed by Hispanic SwDs (2.63).

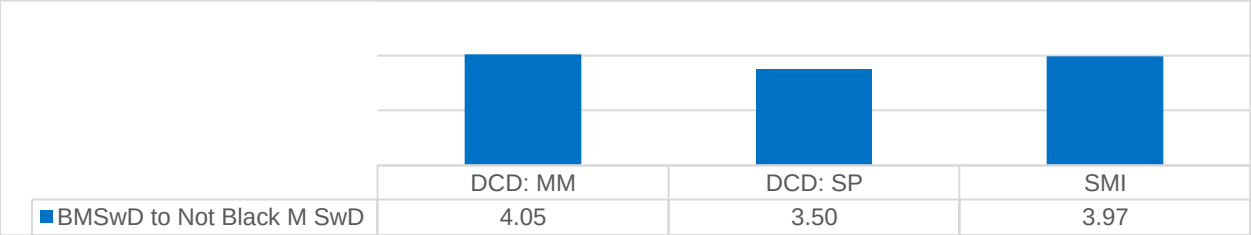
Exhibit 2i. Risk Ratios for Males to Females by Disability Area and Race/Ethnicity



Disability Risk Ratios for Black Male SwDs to Not Black Male SwDs

Exhibit 2j. Disability Risk Ratios Over 2.5 Comparing Black Male to Not Black Male SwDs shows much higher likelihoods of identification for DCD (mild/moderate at 4.05 and severe/profound at 3.50). Also, the area of SMI had a risk ratio of 3.97.

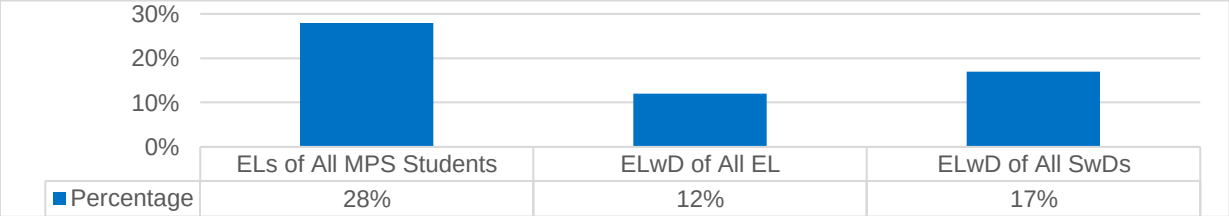
Exhibit 2j. Disability Risk Ratios Over 2.5 Comparing Black Male to Not Black Male SwDs



7. English Learners with Disabilities

Based on MPS data we received, English learners with disabilities (ELwD) receive special education at rates below the proportion of EL students. As shown in Exhibit 2k. ELwD Demographics, EL students comprised 28 percent of all MPS students. ELwD comprised a much smaller composition of all EL students (12%) and of all SwDs (17%).

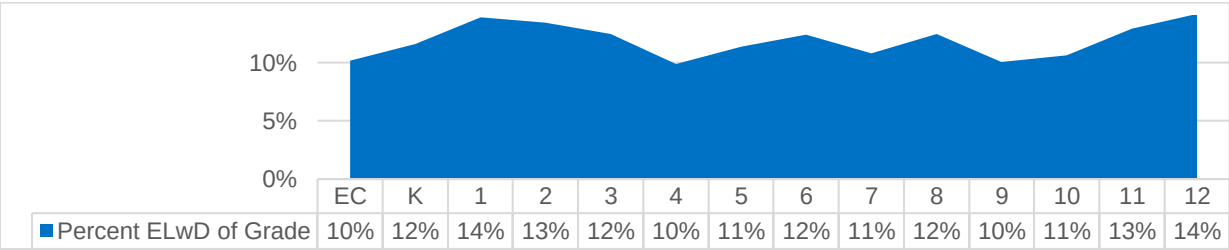
Exhibit 2k. ELwD Demographics



ELwD Composition by Grade

Exhibit 2l. Shows the percentage of ELwDs based on each grade's student enrollment. The rate increased from kindergarten (10%) to 1st grade (14%) and then began at 2nd grade to decrease until 4th grade (10%). From 5th grade through 10th grade the rates ranged by 2 percentage points (10% to 12%). The rates increased again in 11th grade (13%) and 12th grade (14%). This variable data profile is different from those the SST has seen in other districts, which typically builds in the early grades and then decreases in later grades. This difference may be due to incoming students from outside the U.S.

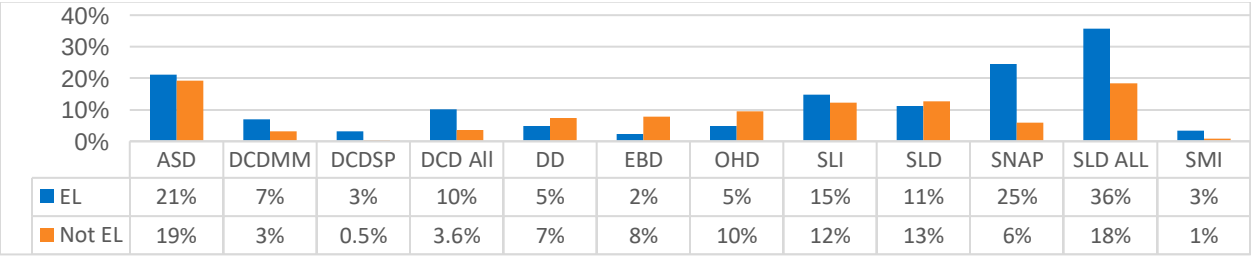
Exhibit 2l. Percent ELwD of Grade Enrollment



ELwD and Not ELwD Composition

Exhibit 2m. Percent EL and Not EL by Disability based on their respective total student figures reflected much higher rates for ELwD compared to Not ELwD in the areas of DCD/MM (7% to 3%), DCD/SP (10% to 3.6%), DCD All (10% to 3.6%), SNAP (25% to 6%), all SLD (36% to 18%), and SMI (3% to 1%).

Exhibit 2m. Percent EL and Not EL by Disability

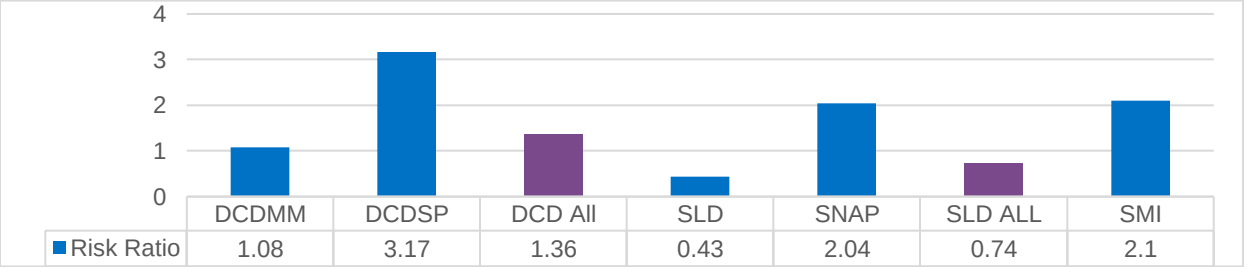


ELwD to Not ELwD Risk Ratio

Exhibit 2n. Risk Ratios for ELwD to Not ELwD reflected figures over 2 for a disability or disability component. The highest risk ratio is for DCD/SP (3.17), which when combined with DCD/MM decreased to 1.36. The SNAP risk ratio is 2.04, which when combined with SLD decreased to 0.74.

The SMI risk ratio is 2.1.

Exhibit 2n. Risk Ratios for ELwD to Not ELwD



Interviewee Feedback

Interviewees provided the following feedback –

- The team was told that a representative from special education has been embedded in the EL department for about three years, although it was not clear how information about EL special education qualification is effectively communicated to school facilitators without an apparent comprehensive special education and EL manual.
- Translations for IEPs appear to be accessible for parents with need.
- While there is awareness across the district at various levels regarding racial/ethnic disproportionality generally, it is not clear that risk ratio data such as those referenced above have been shared widely with action planning in place to address areas of need.

MPS Written Information About Referrals, Evaluations, and Eligibility Determinations

The following information was provided by MPS or available on the district or state website.

1. MPS Special Education Evaluation Referral Initiatives

We asked MPS to share information about any initiatives taken during the past several years to ensure appropriate referrals of students for special education evaluations and responsibilities of principals, and other school-based and administrative personnel for this process. In response, a special education department representative provided the following three-pronged approach to ensure appropriate referrals.

- **Equity Training.** The presented hypothesis is that staff members and the special education identification process might be consciously or unconsciously biased, which leads to some groups of students disproportionately qualified for special education. School staff receive this training "to raise awareness, their knowledge base, and help their personal journey to become anti-racist and promote equity."
- **MTSS.** School staff members wrote that one primary referral reason relates to students who need "help" or "support." Understanding pre-referral interventions are essential to ensure appropriate referrals and that special education department personnel collaborate with general education colleagues "to advocate, promote, and support Tier I and II interventions within the MTSS framework to support and meet students' needs…." (Note: The written

comment did not include Tier III interventions.)

- **Reducing Bias Questions and Exclusionary Factors.** A number of factors, such as low attendance, a lack of English language proficiency or formal education experiences, and school resources may explain why students are not achieving compared to their same age peers. "We ask school team members to review, discuss, and address these factors prior to an evaluation for special education services."

In addition, we received the district's 30-page SLD Procedures pertaining to the evaluation of students suspected of having a specific learning disability (SLD). About 30 percent of all district SwDs are qualified in this area. The document addresses the relationship between MTSS and SLD, and MPS's use of the above described SRBI process that relies on MTSS components relating to universal screening, Tier III interventions, progress monitoring, and intervention adjustments based on monitoring results. Evaluation documentation is expected to describe at least 2 interventions with progress monitoring data collected over at least 7 school weeks and 12 data points. Additional procedures apply to ensuring implementation integrity, including a school-based MTSS team that monitors implementation procedures, reports when implementation is inconsistent, and consults with school administrators to follow up with training, mentoring, etc.

It is important to note that the integrity of these procedures relies on universal expectations for MTSS practices rather than use only for students suspected of having SLD. The Literacy and Math Guidance included includes information aligned with the SLD Procedures related to interventions and progress monitoring use, but without its specificity about –

- Prior to intensifying an intervention from Tier II to Tier III and prior to a special education evaluation referral, use of a publisher recommended fidelity checklist showing at least 80 percent intervention for the recommended duration of time.
- Consideration of attendance for student absenteeism exceeding 20 percent.

2. Special Education Procedural Manual

We also asked MPS to provide written procedures for implementing special education and related services eligibility we received a folder with 57 separate PDF and WORD documents having random titles with no apparent order. One document, "Introduction 2018," referred to MPS's Due Process Notebook that is updated regularly. A table of contents was not included. Based on the folder's format, easy stakeholder access was not readily apparent. General information is available on MPS's special education webpage.

One document of note, Educational Evaluations and Reevaluations: Planning and Notice, contains the title "OCR Voluntary Compliance Agreement: Guidelines for Reducing Bias in Evaluations," which states in part –

> As part of the district's decision to continue to follow the spirit of a Voluntary Compliance Agreement with the Office for Civil Rights (OCR) first implemented in the 1999 school year, the district requires that all school evaluation teams

implement the *Guidelines for Reducing Bias in Special Education Evaluation* (The Guidelines) for all initial special education evaluations and for reevaluations when a new disability category is being considered for a student. The purpose of this procedure is to determine if socioeconomic or cultural factors might have impacted the initial determination of disability and to ensure that students are not placed in special education programs as a result of nondisabling factors or conditions.

The importance of a special education procedural manual cannot be overstated as this type of document provides a unified source of information from which to train and reference when questions arise. For example, one cannot easily transverse the many special education documents shared to address issues that interviewees raised, such as whether an eligibility team must follow outside evaluation results or a parent request for an evaluation must be automatically approved absent any educational justification. A few examples of other school district manuals are from the Chicago Public Schools and the Boston Public Schools.

3. Interviewee Feedback Regarding the Evaluation Process

Various comments from interviewees presented information regarding initial evaluation assessment requirements that differ from other school district practices with which we are familiar. According to social workers, psychologists, and nurses, an initial evaluation (other than for a speech and language impairment) must include an individual assessment from each of these personnel areas, including parent interviews.

This apparent requirement differs from IDEA, which requires an assessment in all areas related to the student's suspected disability, including, **if appropriate**, health, vision, hearing, social and emotional status, general intelligence, academic performance, communicative status, and motor abilities. 34 C.F.R. § 300.304(c)(4). MDE requirements (at page 9, C.4) are not different from IDEA's. One MPS document has information mirroring the IDEA requirement. Another document (Educational Evaluations and Reevaluations: Planning and Notice) at page 10 requires psychologist input if the team is considering eligibility for ASD, EBD, DCD, SLD, or SNAP. This document specifies also –

- Social workers conduct interviews and parent surveys as appropriate for evaluations and functional behavior assessments (FBAs). They provide direct and indirect service when appropriate to the student as indicated in the IEP.
- Licensed school nurses conduct evaluations in health and physical status and complete the health and medical sections of the evaluation reports.

Interviewees had varying opinions regarding the need for these personnel to be involved in every initial evaluation (other than those addressing speech and language only) –

- Often evaluation information for a student is duplicative with as many as four different assessors interviewing parents, which may not be welcomed by parents.
- Initial and reevaluation processes are overly burdensome and could be streamlined without diminishing the quality of results.

- Combined personnel group interviews with parents worked for some and not others.
- Nurse involvement in every evaluation ensures student health needs are met and that staff who attempt to "screen" students to determine a nurse's need for involvement creates a safety concern. Another comment focused on Medicaid reimbursement for nursing evaluations; however, this factor alone would not justify a broad assessment requirement.

(Note: based on MPS's most current state performance plan outcomes (2022-23), 93.94 percent of initial evaluations were completed within required timeframes.)

Section 504 Qualification

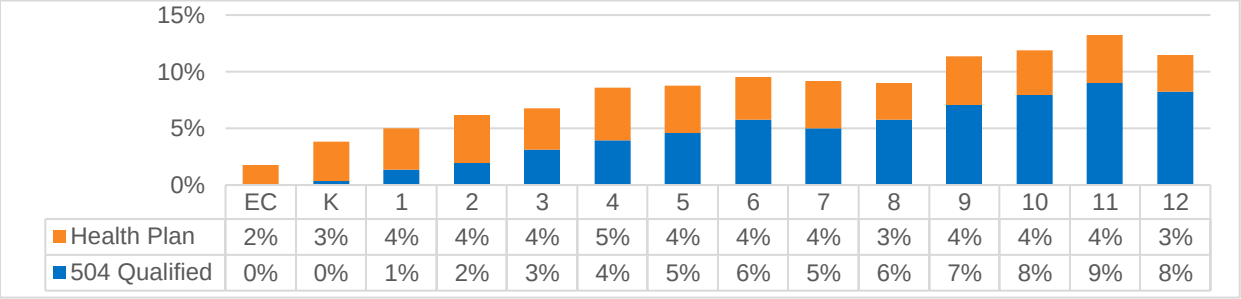
Students who have a disability and do not qualify for special education may be eligible to receive accommodations under Section 504 of the Rehabilitation Act (504). This civil rights law prohibits discrimination based on disability in any program or activity receiving federal financial assistance. Qualified students have a physical or mental impairment that substantially impacts a major life activity. These students do not need special education instruction to meet eligibility requirements. Instead, they are eligible for related aids and services that include accommodations, i.e., instructional adjustments that enable students to learn and demonstrate what they know. Generally, accommodations do not affect course content or curriculum. Examples include sign language interpreters in classrooms, materials in alternate formats, testing accommodations, etc.

1. 504 and Health Plan Demographics

Overall, 4.6 percent of all MPS students are qualified for 504 protection. Of these students, almost all receive services specified in a 504 plan. A small percentage (1.6%) of these students have no need for a service plan but qualify for protections under the law, e.g., for suspensions from school, etc. Also, 3.8 percent of MPS students have a health plan that specifies services they require.

Exhibit 2o. Rates of Students 504 Qualified or with a Health Plan by Grade generally shows a gradual increase of combined rates through the grades, where the small EC figure (2%) doubled at 1st grade (4%) and then steadily increased until 11th grade (13%). The rate decreased at 12th grade (11%). When disaggregated, rates for 504 qualified students increased from 1st grade (1%) to 11th grade (9%). Health plan rates were relatively steady, ranging by 1 percentage point from K to 12th grade (3% to 4%).

Exhibit 2o. Rates of Students 504 Qualified or with a Health Plan by Grade



	EC	K	1	2	3	4	5	6	7	8	9	10	11	12
Health Plan	2%	3%	4%	4%	4%	5%	4%	4%	4%	3%	4%	4%	4%	3%
504 Qualified	0%	0%	1%	2%	3%	4%	5%	6%	5%	6%	7%	8%	9%	8%

2. Written Information about Section 504

In response to our request for information regarding Section 504 implementation we received three documents. Two concern use of the district's 504 EdPlan platform and another concerns the district's fall 2024 training. The training document did not provide comprehensive 504 guidance but rather facilitated an interactive approach to discuss various 504 issues. The Health Services webpage has a link to Section 504, which also has a link to Frequently Asked Questions. Although it appears this page was written for parents, it has more substantive information about 504 than the other documents. However, information that school-based personnel would need to know was lacking, such as the 504 requirement to exclude mitigating measures, i.e., accommodations, when considering a student's eligibility. We did not receive comprehensive Section 504 information, such as that provided by the Chicago Public Schools' Section 504 Procedural Manual.

3. Interviewee Feedback

Reportedly, the highest 504 rates occur within the quadrant of free- or reduced-lunch status (21.5% to 50%) although families of students residing in more affluent areas of Minneapolis have a high 504 awareness. A verbal report of 504 by impairment disclosed the following: ADHD (36% - 38%), anxiety (14% -17%), depression (11%), and half have more than one area. A relatively high percentage (33%) of students reported as nonbinary are 504 qualified.

In the past, 504 was managed out of the special education department. The current 504 coordinator is housed in the Health Services unit under Student Support Services. (Note: 504 also covers such areas as Dyslexia for students with an impairment that substantially impacts reading.) The 504 coordinator provides school-based training for every nurse and case manager who supports school-based 504 services prior to the initiation of their work. There is a desire for more 504 training, including for due process facilitators. Reportedly, the area of 504 has not been addressed during principal meetings. Optional principal training is available during the fall; in the past attendance was mandatory. An electronic platform (EdPlan) supports 504 activities. Typically, social workers manage school-based 504 services but nurses could do so as well.

Recommendation 2. Improve special education referral, evaluation, & eligibility practices.

Data showing several variances between district, state, and national rates, as well as written information and interviewee feedback suggest actions to improve associated practices.

a. Personnel Alignment

Supplement Recommendation 1a with the following –

Specialized Support. Consider a unified organizational structure to oversee all aspects of state and federal responsibilities for special education and Section 504. Establish a new leadership position (reporting to the SAO), with two direct reports. Have one oversee special education; and another oversee personnel meeting IDEA related services criteria and who support both students with and without IEPs. For descriptive purposes only, the *Specialized Support* name is used for this new organization. This cohesive structure would maximize coordination of all activities associated with improved referral, evaluation, and eligibility practices for special education and Section 504 and support all students with related service type needs regardless of disability status. This recommendation is more fully addressed at Section IV. Support for SwD Achievement and Behavior and Social-Emotional Wellbeing (Recommendation 4).

b. Data Review

Using the process set forth in Recommendation 1b for data review, consider the following –

- **Committee.** Review information related to Exhibits 2a through 2o and any other useful data using a district MTSS leadership team committee with representatives from associate superintendents, academics, student group offices, special education, EL, student support services, etc.
- **Root Causes.** Have the committee consider root causes for outlying data that need follow-up review and action. For example, consider student grades showing unusually high or low figures, including the impact of high figures on subsequent year grade enrollment; unusually high numbers or rates of students with ASD, etc.
- **Share Data and Follow Up.** After its review, have the committee identify data (with user-friendly reports) to share with district office, associate superintendents, and principals for their review with staff members on established frequencies based on the type of data under review, such as suspension versus graduation. To the extent possible, review data by assistant superintendent portfolios to identify areas of concern.
- **Summarize Findings.** Provide a summary of the committee findings to the MTSS leadership team for its review and to inform implementation planning.

c. Implementation Plan

Supplement the implementation plan addressed in Recommendation 1c with the following actions to consider actions designed to address root causes for concerning disparate data, such as actions to –

- **Outlying Data.** Based on the data review committee's review and root cause considerations include actions designed for improvement. This will require the involvement of experts knowledgeable about each relevant area of concern and also non-expert representatives with implementation roles.
- **MTSS Fidelity**. Consider the important relationship between MTSS implementation fidelity and justified special education referrals and qualification processes, and whether a desire for students to receive services unduly influences referrals by teachers and parents. Also, consider consequences related to SLD evaluations using less preferred discrepancy criteria because scientific research-based interventions (SRBI) and progress monitoring data were not available. Differentiate consequences based on schools that had not received appropriate materials and PD versus schools that received materials and PD and assistance but went unused.
- **Initial Evaluation Personnel.** With representative feedback from evaluation personnel groups, review the practice of social workers, nurses, and psychologists that exceed federal and state requirement basing assessments on suspected areas of student need and its "return on investment" against having more time for service provision. As part of this consideration, review service tracking data showing the amount of time social workers and nurses engage in evaluation activities versus services to address how current practices curtail support for MTSS related activities and/or IEP-designated services for SwDs.
- **Relationship between Health Plans and 504 Identification.** Consider requiring an annual review of health plans to consider students who may be 504 qualified.

d. Written Guidance and Information

With the committee referenced in Recommendation 2b, consider the areas below to inform PD and consistent practices across the district. Also, include any additional information identified through implementation plan components.

***Specialized Support* Manual.** For this purpose, develop a user-friendly, comprehensive special education, related services, and Section 504 manual. (Referred to as *Specialized Support* manual for descriptive purposes.) Ensure that manual contents are easily found by obtaining feedback from representative users prior to finalizing the documents. In addition to purely procedural provisions, add information designed to improve relevant outcomes. Use text to summarize information that links more detailed documents and post the manual on MPS's website. See, for example, Chicago Public Schools and Boston Public Schools special education guidance Chicago Public Schools' guidance for 504. For Section 504, also consider any additional guidance needed to improve awareness in schools having disproportionately low 504 rates. (Note: this manual is referenced also further below in various written guidance and information sections.) Also, consider a family friendly version, translated into most common languages. Include information about the following –

- **Parent Request for Initial Evaluation.** Align MPS procedures with federal and state requirements that allow evaluation requests to be based on information showing a

suspected disability, notifying parents of reasons for any decision not to evaluate, and providing them with notice of their procedural safeguards.

- **MTSS Guidance and SLD Eligibility Criteria.** Embed in MTSS guidance relevant criteria for SLD eligibility, e.g., rate of progress, etc., for consistent information across documents.
    - **Criteria for Disability and Related Services Eligibility.** Ensure current protocols guide consistent evaluation and eligibility criteria for IEP team application. Use the protocol to document how each student's evaluation results align with each criteria. As part of this process, review the OCR voluntary guidance related to Reducing Bias in Evaluations and revise it if needed based on more recent knowledge about this issue.
    - **Ineligibility for Special Education and Consideration for Section 504 Eligibility.** For students found not eligible for special education, with parent consent continue at the same or future meeting to consider 504 eligibility.
    - **Evaluation of English Learners.** Develop guidance for EL students' evaluation and qualification for special education. See, for example, Santa Barbara County Special Education Local Plan Area's English Learners with Disabilities.

e. Differentiated Professional Development

Based on the *Specialized Support* manual contents, along with other relevant guidance, supplement PD referenced in Recommendation 1g. Focus on using the contents as a daily resource, e.g., how to find various topics as needed, rather than going through them during long (and often boring) sessions. Also, focus on any commonly misunderstood or misapplied areas. Use feedback to schedule future sessions focused on particular areas of high need.

f. Data Analysis and Reporting

Supplement Recommendation 1h and consider user-friendly reports not currently available showing the type of disability data reported in this section. Have data reported by district, by associate superintendent portfolios and by school. Use data checks at these levels to address areas of concern to provide feedback and inform follow up actions.

g. Monitoring and Accountability

Supplement Recommendation 1h with clear accountability expectations and relevant KPIs to monitor implementation of this recommendation at the district, associate superintendent, and school levels.

III. Data Impacting SwD Achievement

In this section, achievement and associated data that includes several measured by the federally required MN State Performance Plan (SPP) for MPS's SwDs.

A. Achievement Outcomes for SwDs 3 through 5 Years of Age
B. Achievement Outcomes for School-Aged SwDs
C. Graduation and Dropout Rates

D. Postsecondary School Outcomes
E. In -School and Out-of-School Suspensions
F. Unexcused Absenteeism
G. Educational Environments

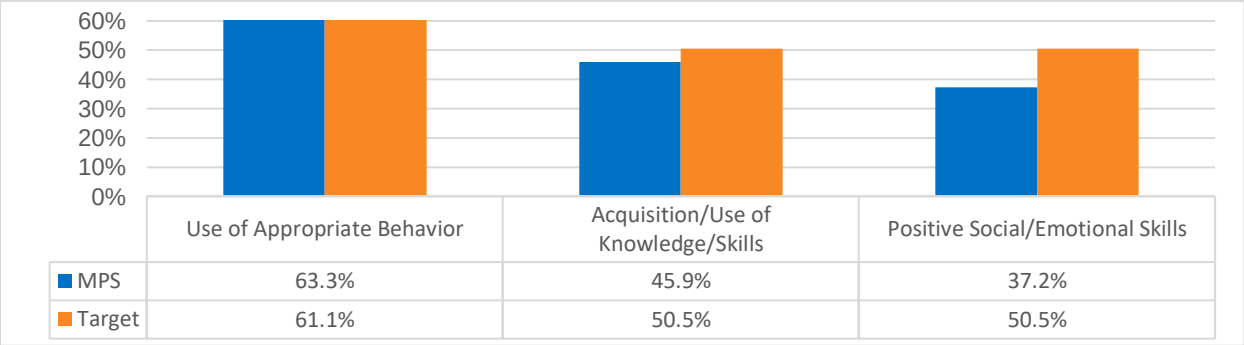
Outcomes for SwDs 3 through 5 Years of Age

One SPP indicator pertains to children with disabilities three through five years of age. Three areas are addressed: use of appropriate behavior (behavior), acquisition and use of knowledge and skills (knowledge and skills), and positive social-emotional skills (social-emotional). These areas are measured by two criteria for children who: 1) exited within age expected developmental levels, and 2) substantially increased their performance upon exiting the program. MPS rates were above targets in one area for the first category and two areas for the second category.

1. Exited EC Within Age Expected Developmental Levels

Exhibit 3a. Exited Within Age Expected Developmental Levels shows MPS exceeded the SPP target for use of appropriate behavior (63.3% with a 61.1% target). Data below targets were acquisition and use of knowledge and skills (45.9% with a 50.5% target) and positive social and emotional skills (37.2% with a 50.5% target).

Exhibit 3a. Exited Within Age Expected Developmental Levels



2. Substantially Increased Performance

Exhibit 3b. Substantially Increased Performance shows MPS exceeded SPP targets for appropriate behavior (65.3%, with 63.3% target) and acquisition and use of knowledge and skills (67.8%, with 64.8% target). The positive social and emotional skills rate fell below its target (59.9%, with 64.8% target).

Exhibit 3b. Substantially Increased Performance

	Use of Appropriate Behavior	Acquisition/Use of Knowledge/Skills	Positive Social/Emotional Skills
MPS Rate	65.3%	67.8%	59.9%
Minimum Target	63.3%	64.8%	64.8%

Note: young children with disabilities who have high outcomes in these areas are typically better prepared to experience educational success in kindergarten.

Academic Achievement Outcomes for School-Aged SwDs

This section includes MPS information about SwDs' participation in statewide reading and math assessments, their proficient or above reading and math rates on the MN Comprehensive Assessment (MCA) and MN Test of Academic Skills (MTAS). This data is based on MDE/MPS's latest SPP outcomes (2022-23) and three years of data (2022-2024) MPS shared with the SST.

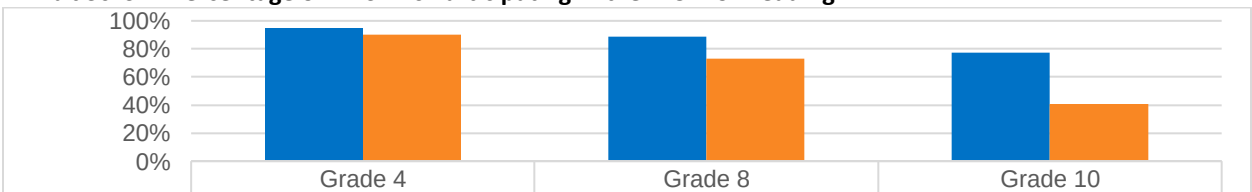
1. MCA Reading Participation and Outcomes

Below are participation rates for the MCA reading assessment, and SwDs outcomes.

MCA Reading Participation Rates

Federal rules require at least 95 percent of all SwDs participate in statewide assessments. Exhibit 3c. SPP Percentage of All SwDs Participating in the MCA for Reading shows MPS rates fell below this requirement and state rates. The district's participation rate was highest at grade 4 (90% compared to MDE's 95%) and lowest at grade 10 (41% compared to MDE's 77%). In particular, the grade 10 rate was much lower than those in other districts with which we have experience. (Note: these participation rates are lower than those we have seen in other school districts with which we have experience.)

Exhibit 3c. SPP Percentage of All SwDs Participating in the MCA for Reading



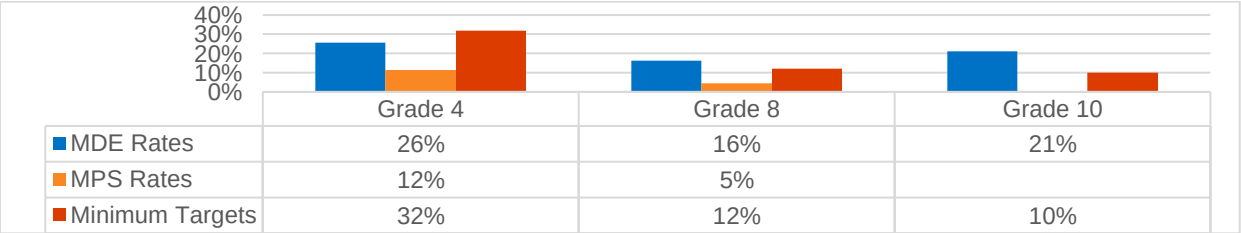
	Grade 4	Grade 8	Grade 10
MDE Rate	95%	89%	77%
MPS Rate	90%	73%	41%

SPP MCA Reading Outcomes

Based on 2022-23 SPP data, MPS proficient or above reading rates were far below state rates and targets. Exhibit 3d. SPP Reading Outcomes show the highest (low) rate was at grade 4 (12%

compared to MDE's 26% rate and 32% target). MPS's grade 8 rate was even lower (5% compared to MDE's 16% rate and 12% target). Grade 10 had too few participants to produce a rate.

Exhibit 3d. SPP Reading Outcomes

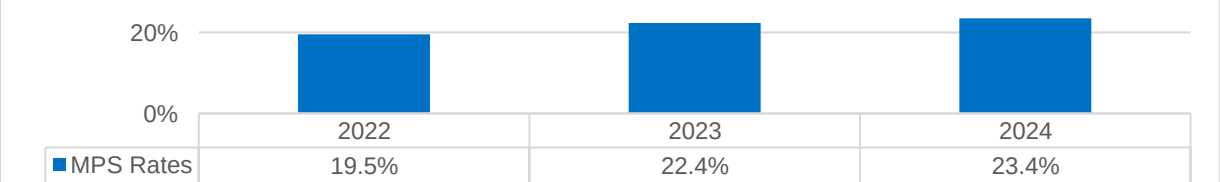


	Grade 4	Grade 8	Grade 10
MDE Rates	26%	16%	21%
MPS Rates	12%	5%	
Minimum Targets	32%	12%	10%

MPS Reported Reading Outcomes

Exhibit 3e. MPS Reported MCA Reading Outcomes (2022 through 2024) show SwDs had higher proficient or above reading rates than those reported by the earlier dated SPP. Rates increased from 2022 (19.5%) to 2024 (23.4%).

Exhibit 3e. MPS Reported MCA Reading Outcomes



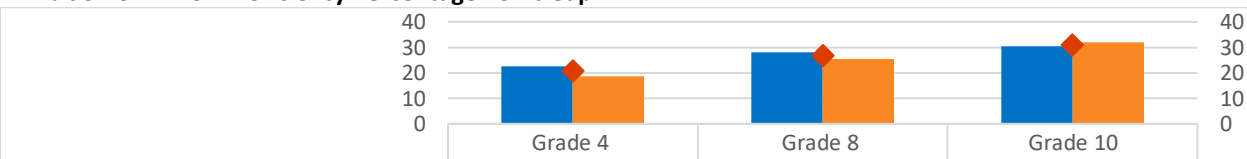
	2022	2023	2024
MPS Rates	19.5%	22.4%	23.4%

MPS SPP Proficiency Gap Between Students without Disabilities and SwDs

Exhibit 3f. SPP MCA Proficiency Rate Gap (2022-23) shows the percentage point gap between nondisabled students and SwDs. MPS met the grade 4 and grade 8 maximum targets but exceeded the grade 10 target.

- **Grade 4.** The MPS gap (19 pp) was below the maximum target (by 2 pp) while MDE's gap was above the target (by 3 pp).
- **Grade 8.** The MPS gap (25 pp) was below the maximum target (by 2 pp) while MDE was above it (by 1 pp).
- **Grade 10.** The MPS gap (32 pp) was above the maximum target (by 1 pp) while MDE's gap was below it (by 1 pp).

Exhibit 3f. SPP MCA Proficiency Percentage Point Gap



	Grade 4	Grade 8	Grade 10
MDE Gaps	23	28	30
MPS Gaps	19	25	32
Maximum Target Percentage Point Gap	21	27	31

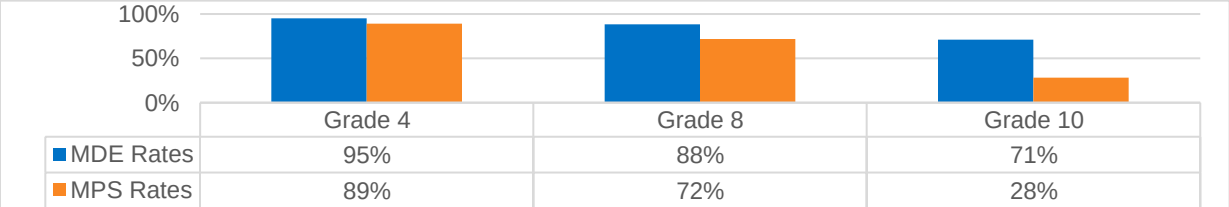
2. MCA Math Participation and Outcomes

Below are participation rates for the MCA reading assessment and SwDs outcomes.

MCA Math SPP Participation Rates

Exhibit 3g. Percentage of All SwDs Participating in the MCA for Math shows MPS rates also fell below the required participation rate (95%) and were lower than reading rates, especially at grade 10. The participation rate was highest at grade 4 (89% compared to MDE's 95%) and lowest at grade 10 (28% compared to MDE's 71%).

Exhibit 3g. SPP Percentage of All SwDs Participating in the MCA for Math

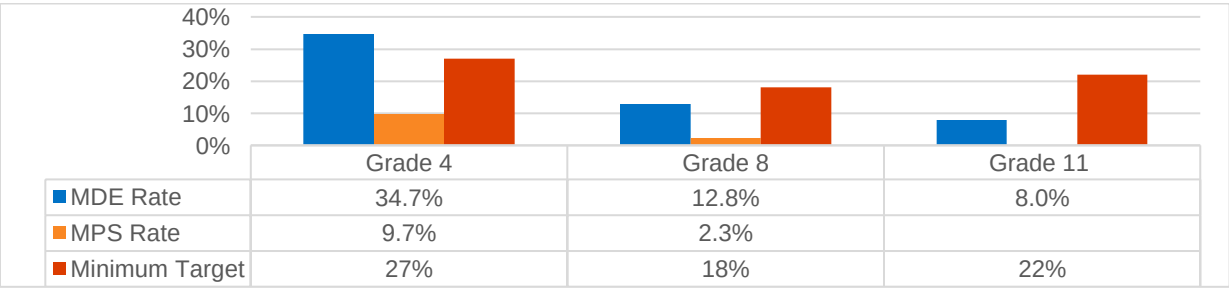


	Grade 4	Grade 8	Grade 10
MDE Rates	95%	88%	71%
MPS Rates	89%	72%	28%

SPP MCA Math Outcomes

Based on 2022-23 SPP data, MPS proficient or above rates were far below state rates and targets. Exhibit 3h. SPP Math Outcomes show the highest rate was at grade 4 (9.7% compared to MDE's 34.7% and 27% target). The grade 8 rate was even lower (2.3% compared to MDE's 12.8% and 18% target). Grade 11 had too few participants to produce a rate.

Exhibit 3h. SPP MATH Outcomes

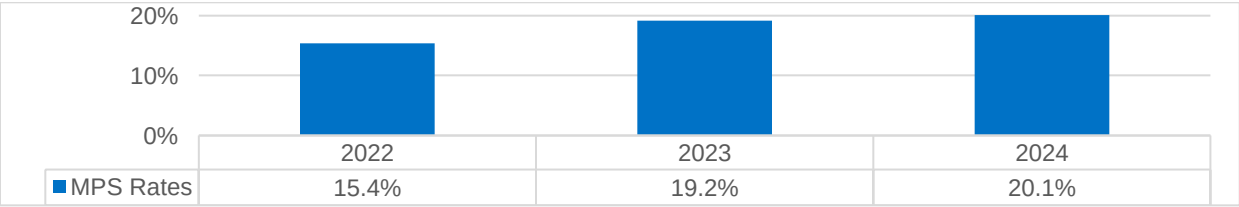


	Grade 4	Grade 8	Grade 11
MDE Rate	34.7%	12.8%	8.0%
MPS Rate	9.7%	2.3%	
Minimum Target	27%	18%	22%

MPS Reported MCA Math Outcomes

Exhibit 3i. MPS Reported MCA Math Outcomes (2022 through 2024) show SwDs had higher proficient or above rates than those reported by the earlier dated SPP. Rates increased from 2022 (15.4%) to 2024 (20.1%).

Exhibit 3i. MPS Reported MCA Math Outcomes



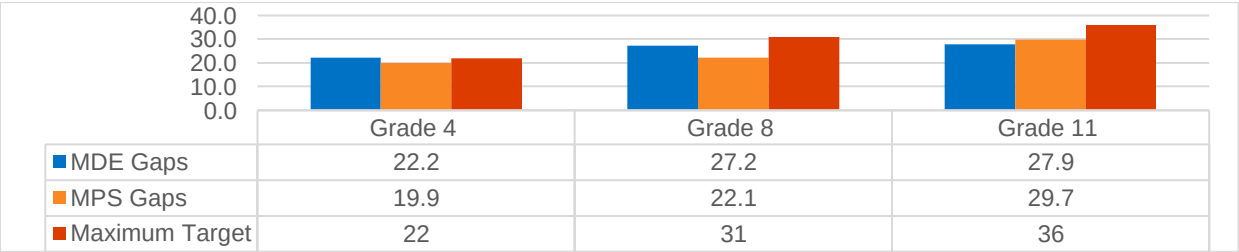
	2022	2023	2024
MPS Rates	15.4%	19.2%	20.1%

SPP Proficiency Gap Between Students without Disabilities and SwDs

Exhibit 3j. SPP MCA Proficiency Gap (2022-23) shows the percentage point gap between nondisabled students and SwDs. MPS met the maximum gap targets at every grade.

- **Grade 4.** MPS's gap (19.9 pp) fell below the maximum target (by 2.1 pp) while MDE was above the target (by .2 pp).
- **Grade 8.** MPS's gap (22.1 pp) fell below the maximum target (by 8.9 pp) as did MDE's (by 3.9 pp).
- **Grade 10.** MPS's gap (29.7 pp) fell below the maximum target (by 6.3 pp) as did MDE's (by 8.1 pp).

Exhibit 3j. SPP MCA Proficiency Gap



3. MCAT Alternate Assessment

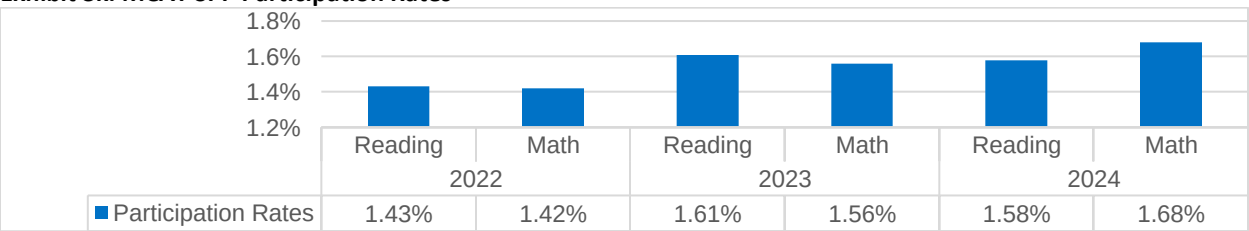
Participation and proficient or above MCAT achievement rates are described below.

MCAT Participation Rates

Federal rules require states to ensure that no more than one percent of all students who take statewide assessments participate in an alternate assessment, which is restricted to students with a significant cognitive disability. While this rate cap does not apply to school districts, those that exceed this cap typically must submit their justification for rates higher than one percent to states.

Exhibit 3k. MCAT SPP Participation Rates reflect figures above the state's 1 percent maximum for both reading and math. The rates in 2022 (1.43% for reading and 1.42% for math) slightly increased in 2024 (1.58% for reading and 1.68% for math).

Exhibit 3k. MCAT SPP Participation Rates

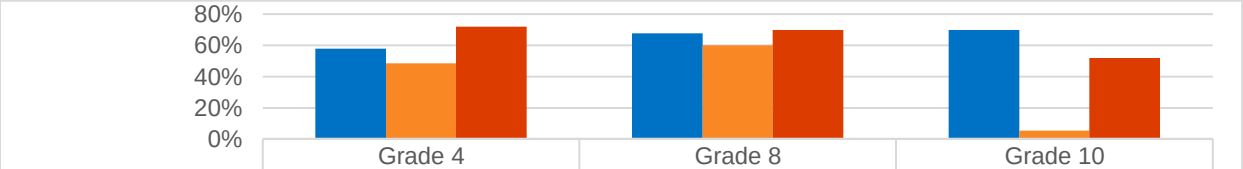


MTAS SPP Reading Outcomes

Data in Exhibit 3l. MCAT SPP Reading Outcomes show both state and MPS proficient or above reading rates fell below state minimum targets at grade 4 (72%) and grade 8 (70%). Both MPS

and MDE rates increased from grade 4 (MPS at 48%, MDE at 58%) to grade 8 (MPS at 60%, MDE at 68%). At grade 10, MPS's reported rate (5%) is extremely low, especially compared to the much higher grades 4 and 8 rates. MDE's much higher rate (70%) met the state minimum target (70%).

Exhibit 3l. MCAT SPP Reading Outcomes

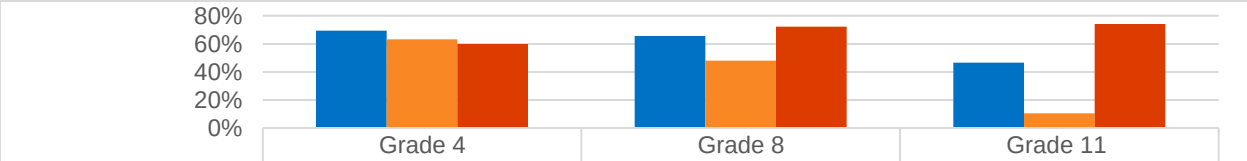


	Grade 4	Grade 8	Grade 10
MDE Rates	58%	68%	70%
MPS Rates	48%	60%	5%
Minimum Targets	72%	70%	52%

MTAS SPP Math Outcomes

Data in Exhibit 3m. MCAT SPP Math Outcomes show both grade 4 MPS (63%) and MDE (69%) proficient or above rates were above the minimum target (60%). MPS's rate decreased at grade 8 (48%) while the MDE rate remained higher (66%); both rates were below the minimum target (72%). As with reading, MPS's high school grade 11 rate was extremely low (10%) compared to other grades and MDE (46%), with both rates falling below the minimum target (74%).

Exhibit 3m. MCAT SPP Math Outcomes



	Grade 4	Grade 8	Grade 11
MDE Rates	69%	66%	46%
MPS Rates	63%	48%	10%
Minimum Targets	60%	72%	74%

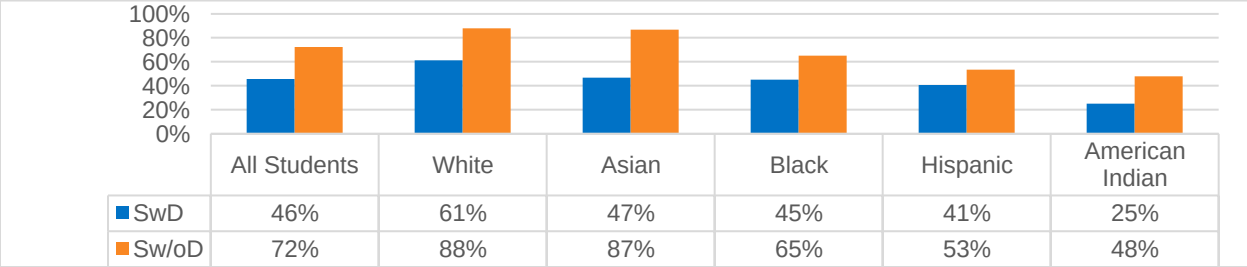
Graduation and Dropout Rates

In addition to achievement outcomes, graduation and dropout rates reflect how well students are benefiting from their education. These areas comprise the first two SPP indicators. The information below includes MPS shared data (2022-23) and MPS data reported in the state's SPP (2021-22).

1. Graduation Rates

The SPP graduation rate for MPS (52%) was below MDE's rate (90%), and below the minimum state target (87%). Exhibit 3n. shows MPS reported Graduation Rates for SwD and Sw/oD by Race/Ethnicity. Overall, White student rates were highest (SwD at 61%; Sw/oD at 88%). American Indian student rates were lowest with one of four (25%) SwDs graduating and half of Sw/oD (48%) graduating.

Exhibit 3n. Graduation Rates for SwD and Sw/oD by Race/Ethnicity

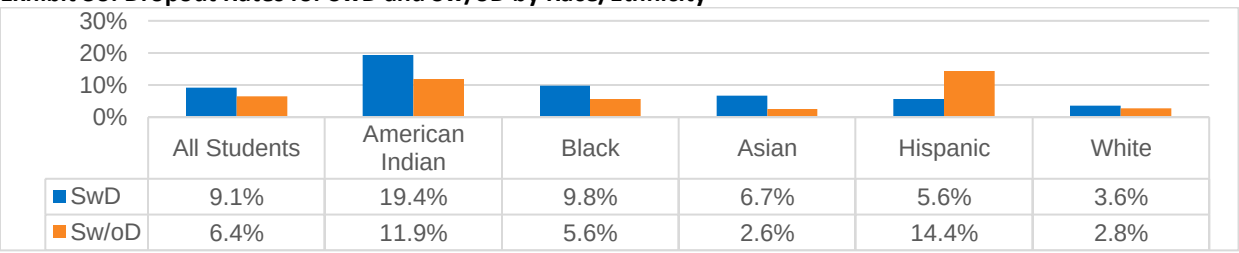


	All Students	White	Asian	Black	Hispanic	American Indian
SwD	46%	61%	47%	45%	41%	25%
Sw/oD	72%	88%	87%	65%	53%	48%

2. Dropout Rates

According to the latest SPP dropout data (2021-22), MPS's rate (9.95%) was above the state's maximum target (9.4%); MDE's rate (9.28%) met the target. Exhibit 3o. shows Dropout Rates for SwD and Sw/oD by Race/Ethnicity. Overall, American Indian rates were highest (SwD at 19.4%; Sw/oD at 11.9%); the next highest rates were for Black students (SwD at 9.8%; Sw/oD at 5.6%). White students had the lowest rates (SwD at 3.6%; Sw/oD at 2.8%).

Exhibit 3o. Dropout Rates for SwD and Sw/oD by Race/Ethnicity



	All Students	American Indian	Black	Asian	Hispanic	White
SwD	9.1%	19.4%	9.8%	6.7%	5.6%	3.6%
Sw/oD	6.4%	11.9%	5.6%	2.6%	14.4%	2.8%

Post School Outcomes

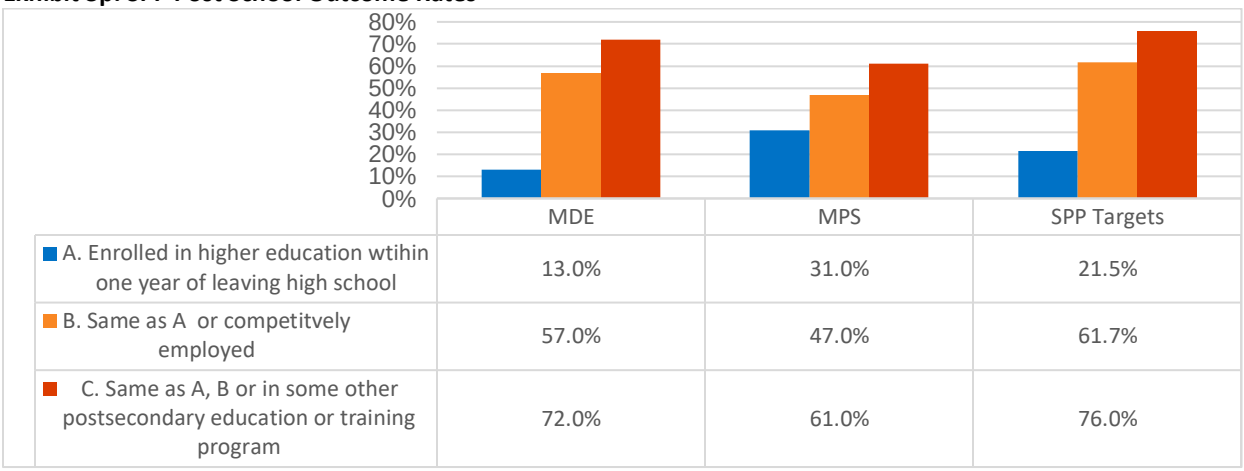
Another SPP outcome reflects the success of elementary and secondary instruction by reporting for students who had IEPs their one year later rates for enrollment in higher education, competitive employment, and/or receipt of other education and training. Exhibit 3p. SPP Outcome Rates show the following –

A. **Enrolled in Higher Education (Criterion A).** 31 percent of former MPS SwDs met this outcome, which was above the SPP minimum target (by 9.5 pp); the MDE rate (31%) was below the SPP target (by 9.5 pp).

B. **Criterion A or Competitively Employed.** 47 percent of former MPS SwDs met this outcome, which was below the SPP target (by 14.7 pp); the MDE rate also fell below the SPP target (by 4.7 pp).

C. **Criterion A, B or In Some Other Postsecondary Education or Training Program.** 61 percent of former MPS SwDs met this outcome, which fell below the SPP target (by 15 pp); the MDE rate was also below the target (by 4 pp).

Exhibit 3p. SPP Post School Outcome Rates



	MDE	MPS	SPP Targets
A. Enrolled in higher education wtihin one year of leaving high school	13.0%	31.0%	21.5%
B. Same as A or competitvely employed	57.0%	47.0%	61.7%
C. Same as A, B or in some other postsecondary education or training program	72.0%	61.0%	76.0%

Out-of-School and In-School Suspension

Suspensions, particularly those that are out-of-school (OSS), have obvious negative impact on student achievement. The SPP has an indicator for OSSs, however, the latest data is from the 2020-21 school year. Given the age of this data, we did not report it below. MPS shared more recent OSS and ISS data (2023-24) for students with and without disabilities and by race/ethnicity. Both OSSs and ISS over 10 days are measured by race/ethnicity for significant disproportionality.

Black students' highly disproportionate OSSs and ISSs are troubling. Higher proportions were experienced by students without disabilities (Sw/oD), most likely due to the procedural safeguards applicable to SwDs. Nevertheless, removal rates and the high likelihood of Black SwD removals are also disturbing. These circumstances perhaps reflect MPS's absence of a behavior MTSS component. As previously addressed, while the district has concentrated on implementing a social emotional curriculum, that approach alone is insufficient to significantly decrease reliance on school or class removal to address disruptive student behavior, particularly as it effects Black students both with and without disabilities. The risk ratios measured, especially for Sw/oDs, are higher than those in other school districts with which we have experience.

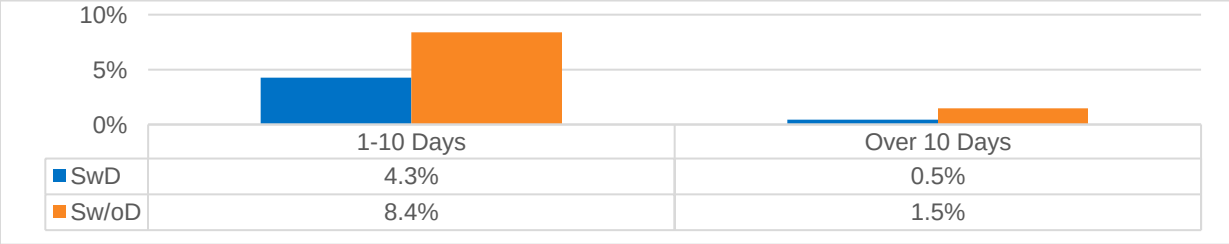
1. Out-of-School Suspensions (OSS)

The information below relates to OSSs by number of removal days, by grade, and by race/ethnicity.

OSS Rates by Disability Status and Day Ranges

Exhibit 3q. OSS Rates by Disability Status and Day Ranges for SwDs and Sw/oDs are based on each respective groups' total student enrollment. Sw/oD rates are higher than SwD rates for both 1-10 days (8.4% to 4.3%) and over 10 days (1.5% to 0.5%).

Exhibit 3q. OSS Rates by Disability Status and Day Ranges (Based on All Respective Students)

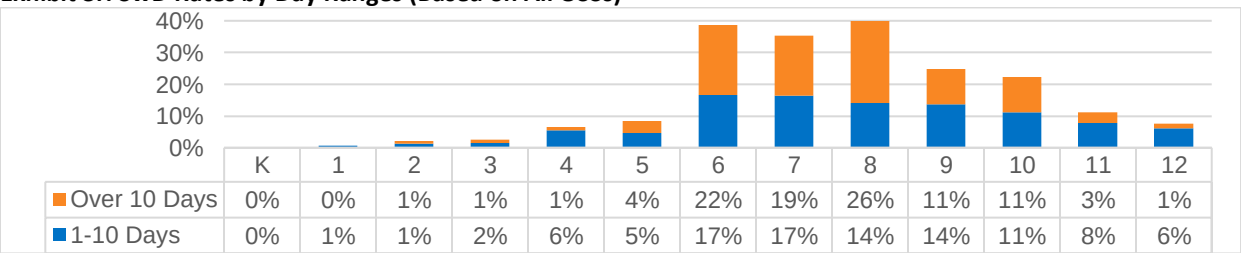


SwD Removal Rates by Grade and Day Ranges

Based on all OSSs, Exhibit 3r. SwD Rates by Day Ranges shows for grades 6 through 8 a higher proportion of removals occurred for over 10 days compared to 1 to 10 days.

- **1 to 10 Days.** Removals were few at grades K through 3 (ranging from 0% to 2%), they increased at grade 4 (6%) and grade 5 (5%) and jumped at grades 6 and 7 (17% each). OSSs remained high at grades 8 and 9 (14%). The rate began to decrease at grade 10 (11%) and decreased further at grades 11 (8%) and 12 (6%).
- **Over 10 Days.** A similar pattern of removals occurred for this day range. OSSs were few at grades K through 4 (ranging from 0% to 1%), increased at grade 5 (4%), and jumped at grades 6 (22%), 7 (19%) and 8 (26%). The rate decreased at grades 9 and 10 (both at 11%) and decreased again at grades 11 (3%) and 12 (1%).

Exhibit 3r. SwD Rates by Day Ranges (Based on All OSSs)



	K	1	2	3	4	5	6	7	8	9	10	11	12
Over 10 Days	0%	0%	1%	1%	1%	4%	22%	19%	26%	11%	11%	3%	1%
1-10 Days	0%	1%	1%	2%	6%	5%	17%	17%	14%	14%	11%	8%	6%

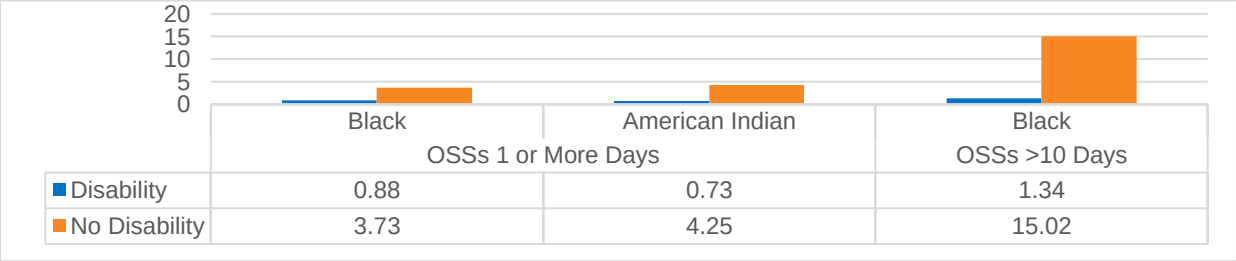
OSS Risk Ratios for Students with and without Disabilities

Exhibit 3s. OSS Black and American Indian Student Risk Ratios and Rates show these students with disabilities were much more likely to be removed from school compared to their peers. (Risk ratios show the likelihood that one group of students exhibit a characteristic compared to all other students.) These data show –

- **Students with Disabilities.** Although a higher risk ratio of Black SwDs were suspended for more than 10 days compared to more than 1 day, the risk ratios were proportionate to non-Black SwDs.

Students without Disabilities. Risk ratios were highest for Black students with OSSs for 1 or more days (3.73) and for more than 10 days (15.02). The risk ratio for American Indian students was also high at 4.25.

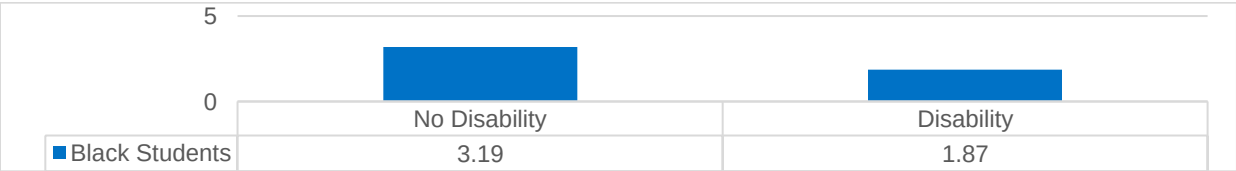
Exhibit 3s. OSS Black and American Indian Student Risk Ratios



2. In-School Suspensions (ISS)

The information below relates to in-school suspensions for 1 to 10 days. ISSs did not total more than 10 days. Exhibit 3t. ISS Risk Ratios for Black Students reports a higher risk ratio for students with no disability (3.19) than those with a disability (1.87).

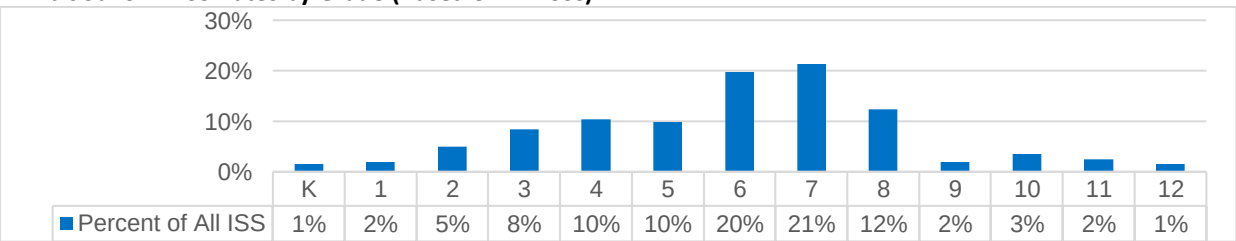
Exhibit 3t. ISS Risk Ratios for Black Students



SwD 1-10 Days of ISS Rates by Grade

Exhibit 3u. ISS Rates by Grade show SwDs were removed at lower rates in kindergarten (1%) and grade 1 (2%), they began to increase at grade 2 (5%) and continued to increase through grades 4 and 5 (10%). As with OSSs, rates jump at grades 6 (20%) and grade 7 (21%) and then decreased at grade 8 (12%). The ISS rates are low at grades 9 through 12 (ranging from 2% to 1%).

Exhibit 3u. SwD ISS Rates by Grade (Based on All ISSs)



Unexcused Absenteeism

Unexcused absenteeism, especially when above 10 school days, can have a significant impact on achievement due to a loss of learning, reduced engagement, etc. Student absenteeism has various causes, including those not within student control and unrelated to illness. Below, unexcused absenteeism data are analyzed by disability status and day ranges, grade, and race/ethnicity.

MPS Absenteeism Procedures

MPS shared with the SST information about absenteeism stating, “A student is considered

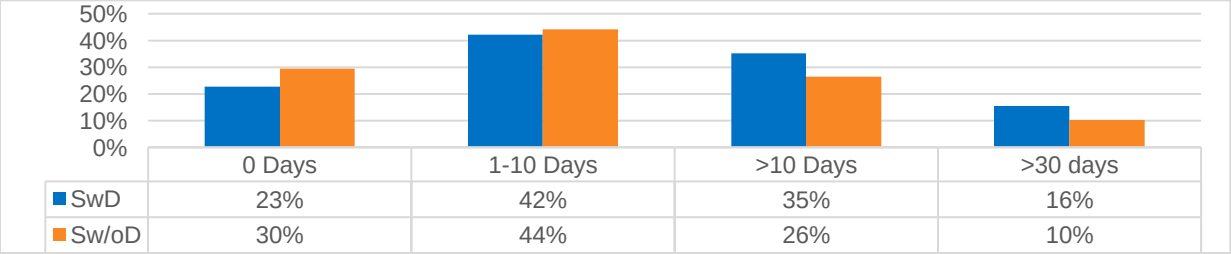
chronically absent when missing 90% of more of school, excused or unexcused." (Note: MDE defines the term "as students missing at least 10 percent of school days (the equivalent of missing one day out of every two traditional school weeks)."

They describe interventions, which are the same for elementary and secondary school students. These include procedural requirements, such as notifying parents and discussing absenteeism with them, and reporting neglect and truancy to proper authorities after six cumulative unexcused absences in a school year. They also specify that SwDs may have in their plans modified attendance expectations, incentives, recognitions and interventions.

Absenteeism Rates by Disability Status and Day Ranges

Exhibit 3v. Absenteeism by Disability Status and Day Ranges show SwDs have higher rates than Sw/oDs for absences over 10 days (35% to 26%) and over 30 days (16% to 10%). SwD absenteeism. rates are lower than Sw/oDs for 0 days (23% to 30%) and 1 to 10 days (42% to 44%).

Exhibit 3v. Absenteeism by Disability Status and Day Ranges



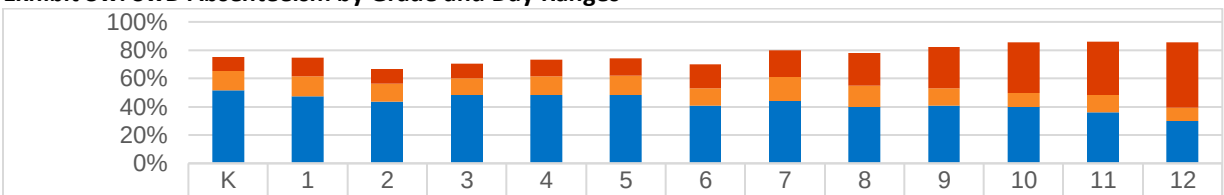
	0 Days	1-10 Days	>10 Days	>30 days
SwD	23%	42%	35%	16%
Sw/oD	30%	44%	26%	10%

SwD Absenteeism Rates by Grade and Day Ranges

To further disaggregate SwDs absenteeism data, Exhibit 3w. SwD Absenteeism by Grade and Day Ranges show the following –

- **1-10 Days.** SwD rates were highest at kindergarten (51%), decreased at grade 1 (47%) and grade 2 (43%), and increased at grades 3 through 5 (ranging from 48% to 49%). Rates decreased from grades 6 through 10 (ranging from 44% to 40%) and decreased further at grade 11 (36%) and grade 12 (30%).
- **11 to 20 Days.** From kindergarten through grade 6 rates ranged from 12 percent (grades 3 and 6) to 14 percent (kindergarten and grade 1). Rates were higher at grade 7 (17%) and grade 8 (15%). Through high school the rates were lower, ranging from 10 percent (grade 12) to 13 percent (grade 9).
- **Over 20 Days**. Comprising more than about one month of school, absenteeism rates steadily increased from kindergarten (10%) to grade 12 (46%). Notable jumps occurred at grade 6 (from 12% to 17%), grade 9 (from 23% to 29%), and grade 12 (38% to 46%). The grade 12 rate comprised almost half of all SwDs at that grade, suggesting higher absenteeism for students remaining in school for post-secondary transition services.

Exhibit 3w. SwD Absenteeism by Grade and Day Ranges

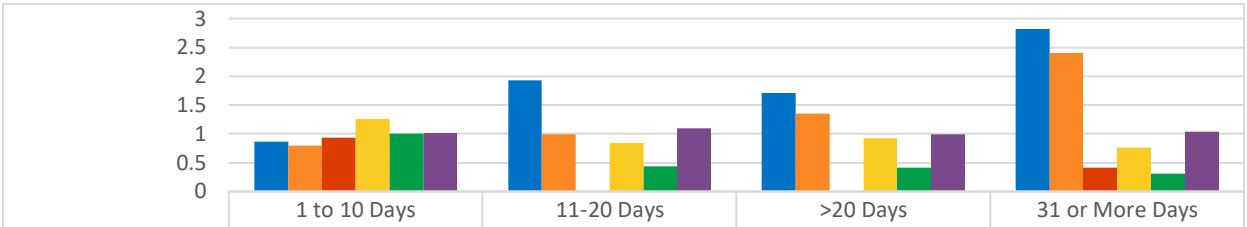


	K	1	2	3	4	5	6	7	8	9	10	11	12
>20 Days	10%	13%	10%	11%	12%	12%	17%	19%	23%	29%	36%	38%	46%
11-20 days	14%	14%	13%	12%	13%	13%	12%	17%	15%	13%	10%	12%	10%
1-10 Days	51%	47%	43%	48%	48%	49%	41%	44%	40%	41%	40%	36%	30%

SwD Absenteeism Rates by Race/Ethnicity Risk Ratios and Day Ranges

Exhibit 3x. SwD Absenteeism Risk Ratios shows the highest risk ratios related to 31 or more days for Black students (2.82, 21% rate) and American Indian students (2.40, 34% rate). The next highest risk ratio was for Black students (1.93, with 11-20 days of absenteeism).

Exhibit 3x. SwD Absenteeism Risk Ratios



	1 to 10 Days	11-20 Days	>20 Days	31 or More Days
Black	0.87	1.93	1.71	2.82
American Indian	0.79	0.99	1.35	2.40
Asian	0.93			0.41
Hispanic	1.26	0.84	0.92	0.76
White	1.00	0.44	0.41	0.31
Two or More	1.01	1.10	0.99	1.04

Educational Environment Rates

The location in which students receive instruction, including special education and related services, impacts their achievement and social and emotional welfare. The sections below address high level data for measuring the extent to which SwDs are educated in the various environments (from least to most restrictive) established by the U.S. Department of Education (ED). The reporting of environments is different for children 3 through 5 years of age (not including kindergarten) and for those 5 through 21 years of age (school-aged). ED requires states to establish SPP targets for three educational environments and posts data for each state and the nation.

1. Children 3 through 5 Years of Age

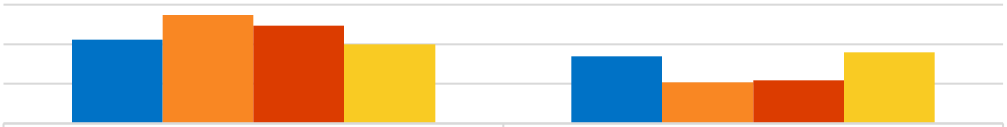
The following data sets report two of the federal educational environments for young children: 1) receipt of instruction in regular classrooms for most of the day; and 2) special classes, separate schools, and residential facilities.

MDE and MPS with SPP Targets, and US Data

Exhibit 3y. Rates for Children 3 to 5 by Environment shows figures based on the district's SPP report (showing district and state rates and state targets) and U.S. rates based on 2022-23 federal data.

- **Regular Class Most of the Time.** MPS's rate (42.3%) was lower than MDE's rate (54.8%), was below the SPP's minimum target (49.5%) but higher than the US's rate (40%).
- **Special Class, Special Schools, Residential Facilities.** MPS's rate (33.8%) was higher than MDE's rate (20.7%) and SPP's maximum target (21.8%), but below the US's rate (36%).

Exhibit 3y. Rates for Children 3 to 5 by Environment



	Majority of Time in Regular Class	Separate Class/School
MPS	42.3%	33.8%
MDE	54.8%	20.7%
SPP Target	49.5%	21.8%

MPS Reported Data (December 1, 2023)

Data in Exhibit 3z. MPS Reported Environment Rates for young children show somewhat higher rates for majority of time spent in regular classes (45%) and separate class/school (35%) compared to the SPP rates reported in Exhibit 3y.

Exhibit 3z.MPS Reported Environment Rates

	Majority of Time in Regular Class	Separate Class/School
MPS	45%	35%

2. SPP Data: Children and Youth 5 through 21 Years of Age

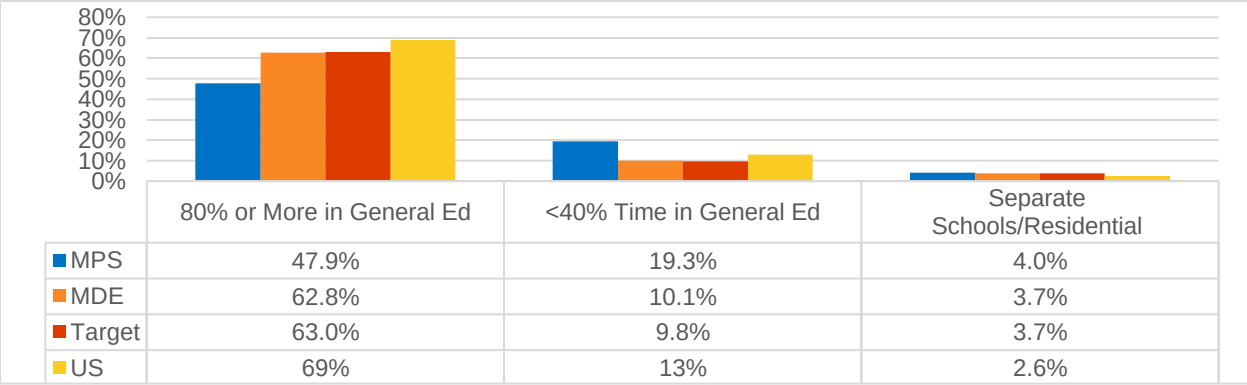
Data is reported by the following areas: receipt of instruction in general education 1) at least 80 percent of the time, 2) between 79% and 40% of the time, and 3) below 40 percent of the time; and instruction in separate classes, special schools, and residential facilities.

District SPP, State, and National Data

Exhibit 3aa. SPP School-Aged Environments for MPS and for the State and the Nation shows figures based on the district's SPP report (for 2022-23) and federal data. (The SPP does not report the 79% to 40% general education category.) These data show MPS rates were below the state, SPP target, and US for regular classroom instruction at least 80 percent of time; and above their rates for regular classroom instruction less than 40 percent of the time and for separate schools and residential facilities.

- **80% or More Time in General Education.** MPS's rate (47.9%) was far lower than rates for MDE (62.8%), the SPP target (63%), and the US (69%).
- **Less than 40% Time in General Education.** MPS's rate (19.3%) was above rates for MDE (10.1%), the SPP target (9.8%), and the US (13%).
- **Separate Schools and Residential Facilities.** MPS's rate (4.0%) was slightly above rates for MDE and the SPP target (both at 3.7%), but all rates were much higher than the US rate (2.6%).

Exhibit 3aa. SPP School-Aged Environments for MPS and for the State and Nation



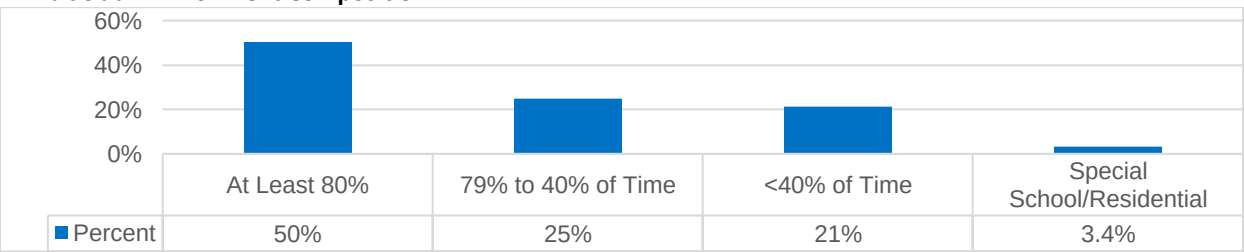
3. MPS Data (2023-24 – Dec. 1, 2023)

The information below presents MPS's December 1, 2023 educational environment data for all SwDs by various indicators: grade, disability area, race/ethnicity overall, race/ethnicity, Black males by disability, and MPS's separate schools. This data is useful to better identify areas of concerns for follow-up action.

Composition of Educational Environments

Exhibit 3bb. Environment Composition shows MPS had a higher rate for students in general education at least 80 percent of the time compared to the earlier SPP data (50% to 48%) and for students in general education less than 40 percent of the time (21% to 19%). A smaller percentage of students were in special or residential schools (3.4% to 4%). Yet, these rates remain more restrictive compared to the state and nation.

Exhibit 3bb. Environment Composition

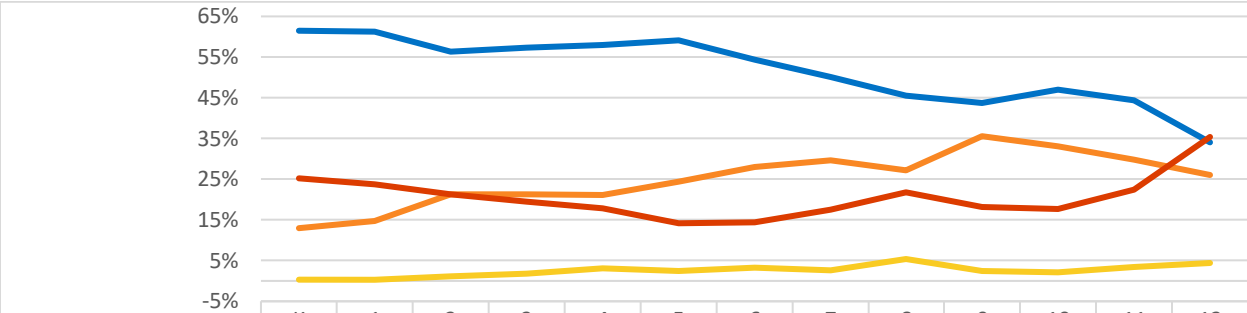


Educational Environment Composition by Grade

Exhibit 3cc. Environment Composition by Grade show the following trends –

- **At Least 80% General Education.** Kindergarten and 1st grade students had the highest rates for this group (61% each). Between 2nd and 6th grades the rates fluctuated (54% to 57%). At 7th grade the rate began to drop (50%) and continued to do so through 11th grade (44%) and 12th grade (34%) when more students are educated in general education less than 40% of the time while they remain in school for secondary transition services.
- **79% to 40% General Education.** Small rates at kindergarten (13%) and 1st grade (15%) increased at 2nd through 4th grades (21% each). Rates then gradually increased from 5th grade through 9th grade (24% to 36%), except for a decrease at 8th grade (27%). Rates decreased between 10th grade (33%) and 12th grade (26%).
- **Less than 40% General Education.** At kindergarten (25%) and 1st grade (24%) rates were relatively high. Rates began to decrease at 2nd grade (21%) and continued to decrease through 9th and 10th grades (18% each), with an exceptional higher 8th grade rate (22%). Rates increased at 11th (22%) and 12th grade (35%) which include students remaining in school to receive secondary transition services.
- **Separate Schools.** Very low rates at kindergarten (0.4%) and 1st grade (0.3%) began to increase at 2nd grade (1.1%) and gradually continued to rise through 6th grade (to 3.3%). The rate briefly fell at 7th grade (2.6%) before peaking at 8th grade (5.4%). Rates for 9th grade (2.4%) and 10th grade (2.1%) fell again before rising at 11th (3.5%) and 12th grades (4.5%).

Exhibit 3cc. Environment Composition by Grade



	K	1	2	3	4	5	6	7	8	9	10	11	12
At Least 80%	61%	61%	56%	57%	58%	59%	54%	50%	46%	44%	47%	44%	34%
79%-40%	13%	15%	21%	21%	21%	24%	28%	30%	27%	36%	33%	30%	26%
<40%	25%	24%	21%	20%	18%	14%	14%	18%	22%	18%	18%	22%	35%
Separate School	0.4%	0.3%	1.1%	1.8%	3.1%	2.4%	3.3%	2.6%	5.4%	2.4%	2.1%	3.5%	4.5%

MPS and US Less Restrictive Educational Environments by Disability

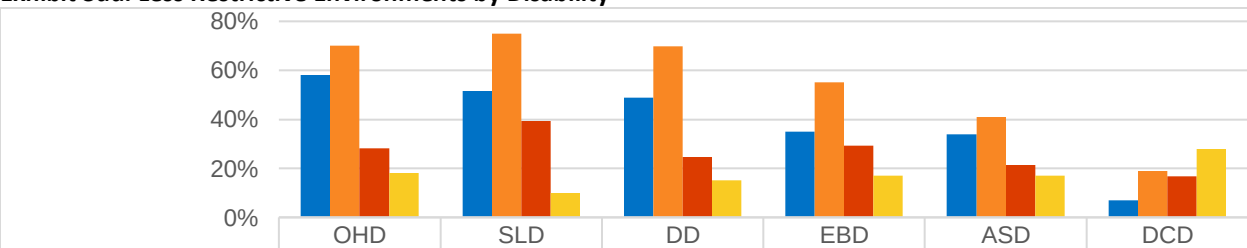
Exhibit 3dd. Less Restrictive Environments by Disability compares MPS and US rates for the most common disability areas. (Note: all MPS students with a single speech and language impairment disability are educated in the general education at least 80% category.)

- **At Least 80% General Education.** MPS rates were lower than US rates in every disability area.

The largest differences were for SLD (52% to 75%, 29pp), DD (49% to 70%, 21pp), and EBD (35% to 55%, 20pp). Smaller but still sizeable differences were for OHD (58% to 70%, 12pp), DCD (7% to 19%, 12pp), and ASD (34% to 41%, 7pp).

- **79% to 40% General Education.** MPS rates were higher than US rates in every disability area except for DCD. SLD had the largest difference (39% to 10%, 29 pp). Smaller differences were for EBD (29% to 17%, 12 pp), OHD (28% to 18%, 10pp), DD (25% to 15%, 10 pp), and ASD (22% to 17%, 5 pp). MPS's rate was lower than the US's for DCD (17% to 28%, 11 pp).

Exhibit 3dd. Less Restrictive Environments by Disability



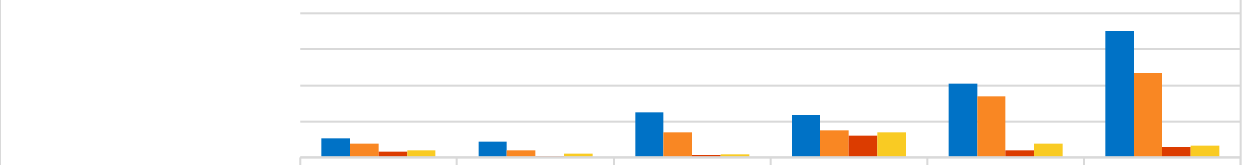
	OHD	SLD	DD	EBD	ASD	DCD
At Least 80% MPS	58%	52%	49%	35%	34%	7%
At Least 80% US	70%	75%	70%	55%	41%	19%
79% to 40% MPS	28%	39%	25%	29%	22%	17%
79% to 40% US	18%	10%	15%	17%	17%	28%

MPS and US More Restrictive Educational Environments by Disability

Exhibit 3ee. More Restrictive Environments by Disability figures MPS rates were larger than US rates in all areas. For separate schools or residential facilities MPS rates were lower than the US's by small percentage points. (Note: MPS has no students in residential facilities.)

- **Less than 40% General Education.** MPS and US rate differences were largest for DCD (70% to 47%, 23pp). Rate differences were smaller, but still noteworthy, for DD (25% to 14%, 11pp), EBD (24% to 15%, 9pp), ASD (41% to 34%, 7pp), and SLD (9% to 3.8%, 5 pp). OHD had the smallest rate difference (11% to 7.7%, 3pp).
- **Separate Schools.** MPS had lower rates than the US. Largest differences were for ASD (3.9% to 7.8%, 3.9pp), EBD (12% to 14%, 2pp), SLD (0.6% to 1.9%, 1.3pp). Smaller differences applied to OHD (3.3% to 4.0%, 0.7pp), DCD (5.9% to 6.4%, 0.5pp), and DD (1.5% to 1.7%, 0.2pp).

Exhibit 3ee. More Restrictive Environments by Disability

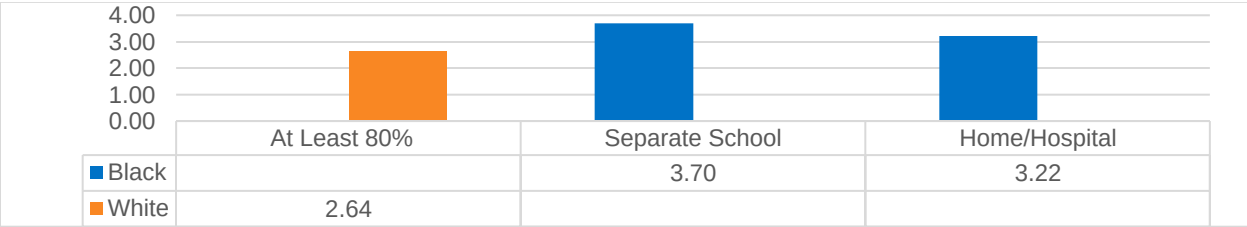


	OHD	SLD	DD	EBD	ASD	DCD
<40% MPS	11%	9%	25%	24%	41%	70%
<40% US	7.7%	3.8%	14%	15%	34%	47.0%
Separate School MPS	3.3%	0.6%	1.5%	12%	3.9%	5.9%
Separate School US	4.0%	1.9%	1.7%	14.0%	7.8%	6.4%

Racial/Ethnic Risk Ratios for Environments Over 2.5

Data in Exhibit 3ff. Race/Ethnic Risk Ratio Environments Over 2.5 show Black and White SwDs meeting this criteria. Black SwDs were 3.70 times more likely than other SwDs to be educated in separate schools and 3.22 more likely to receive instruction at the home or hospital setting. White SwDs were 2.64 times more likely to be educated in general education at least 80% of the time.

Exhibit 3ff. Race/Ethnic Risk Ratio Environments Over 2.5

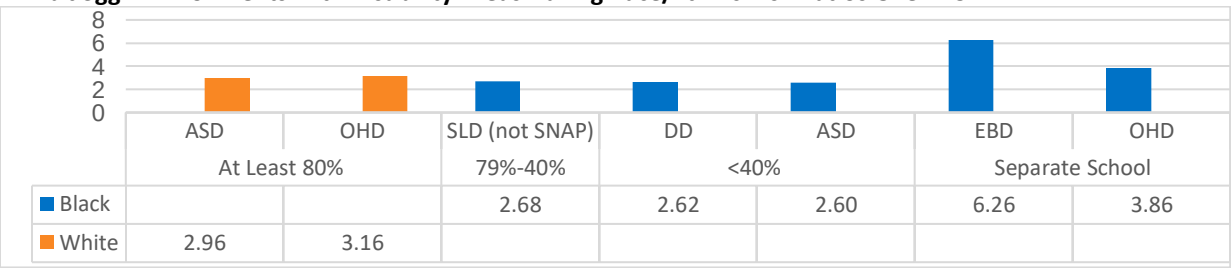


Educational Environment by Disability and Race/Ethnicity Risk Ratios

Data in Exhibit 3gg. Environments with Disability Areas Having Race/Ethnic Risk Ratios Over 2.5 show this criteria was met by Black SwDs in five areas and White students in two areas.

- **At Least 80% General Education.** Only White SwDs met this risk ratio (rr) criteria: ASD (2.96 rr) and OHD (3.16 rr).
- **79% to 40% General Education.** Black SwDs met this criteria for SLD (not SNAP) with a risk ratio of 2.68.
- **Less than 40% General Education.** Black SwDs met this criteria for DD (2.62) and ASD (2.60).
- **Separate Schools.** For this setting, Black SwDs had the highest risk ratios of all environments: EBD (6.26) and OHD (3.86).
- **Homebound/Hospital.** Only Black students (11) with severe multiple impairments (SMI) received instruction in this setting.

Exhibit 3gg. Environments with Disability Areas Having Race/Ethnic Risk Ratios Over 2.5



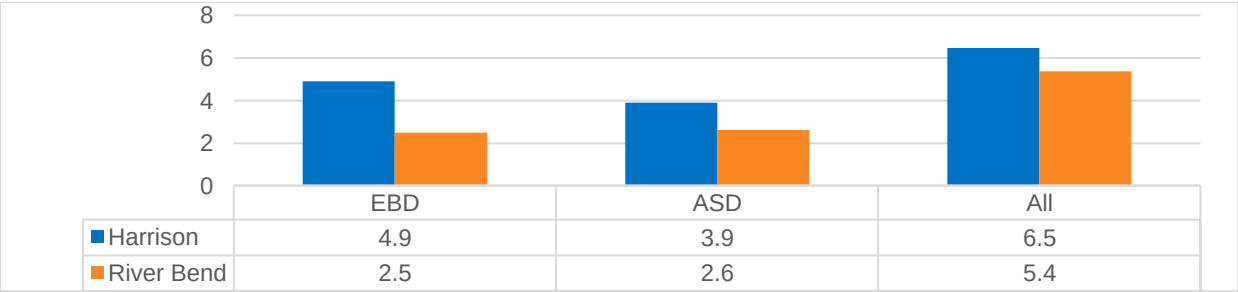
River Bend and Harrison Educational Centers

Given the high-risk ratios for Black SwDs educated in separate schools, we reviewed data for MPS's two schools attended by SwDs only: River Bend (K-8th grade) and Harrison (high school). Based on each of the schools' total SwD enrollment, Black students' compositions were disproportionately high: River Bend (66%) and Harrison (70%). Both rates were much higher than

compositions for MPS's Black SwD (38%) and all Black students (35%). Data in Exhibit 3hh. Harrison and River Bend Black Student Risk Ratios Over 2.5 show the following risk ratios –

- **River Bend.** The risk ratio is highest for all Black SwDs (6.5), followed by EBD (4.9) and then by ASD (3.9).
- **Harrison.** The risk ratio is highest also for all Black SwDs (5.4), followed by ASD (2.6), and then by EBD (2.5).

Exhibit 3hh. Harrison and River Bend Black Students Over 2.5



	EBD	ASD	All
Harrison	4.9	3.9	6.5
River Bend	2.5	2.6	5.4

Recommendation 3. Benchmark, track, and use associated achievement data to inform actions to improve SwDs' academic, behavior, and social-emotional outcomes.

SwD's very low achievement and associated rates and disproportionately high rates (especially for Black SwDs) for OSSs and ISSs, absenteeism, and restrictive educational environments require a spotlight on these data to monitor progress and take follow-up action.

a. Data Review

Using the process set forth by Recommendation 2a, supplement areas for data review with the following and other relevant information.

- Outcomes for Young Children with IEPs. See Exhibit 3a-b.
- **Achievement Results**. See Exhibits 3c-m for ELA and math outcomes for SwDs. In particular, see Exhibit 3d. Percentage of All Students Participating in MCAT to address the 1.5 percent non-charter participation rate (above the state's 1% maximum rate).
- Graduation and Dropout Rates. See Exhibits 3n-o.
- Postsecondary Outcomes. See Exhibit 3p.
- **In/Out-of-School Suspensions.** See Exhibits 3q-u. Focus on schools with greater use of OSSs and ISS, disparities between students with and without IEPs and by race/ethnicity; and consider grades showing highest rates.
- **Absenteeism.** See Exhibits 3v-y. Consider data for students with and without IEPs; for SwDs at upper grades absent for more than 20 days or more than 10 days; and Black and American Indian SwDs absent 31 or more days.

- **Educational Environment for Children 3-5 Years of Age.** Review Exhibit 3y and consider why MPS rates for young children spending their majority of time in EC classes is smaller than state and national rates.
- **Educational Environments for School-Aged Students**. Review Exhibit 3aa-gg for data showing MPS SwDs are educated in more restrictive education environments at rates higher than the state and nation overall; and disparities by student groups and grades. See, e.g., Exhibit 3cc - highest 8th grade restrictive placement rate; Exhibit 3ff -separate school EBD risk ratios for Black students (6.26) and OHD students (3.86); Exhibit 3gg - high Black student separate school risk ratios at Harrison (6.5) and River Bend (5.4) and associated text - only Black students with SMI receiving services at home/hospital.

b. Implementation Plan

Based on the data review above and other information, supplement Recommendation 1c with implementation planning designed to address root causes for concerning disparate data for areas, such as –

- **State Assessment Participation Rates.** Addressing MCA participation rates that are lower than the federal 95 percent minimum rate and MCAT rates that exceed the federal 1 percent maximum rate.
- **Graduation Outcomes.** Considering strategies in the University of Chicago's What Matters for Staying ON-Track and Graduating in Chicago Public Schools: A Focus on Students with Disabilities to increase the SwD high school graduation rate.
- **Dropout Prevention.** Including activities such as those in Practices that may Help Prevent Students with Disabilities from Dropping Out of High School and information the PACER Center website provides to decrease the SwD dropout rate.
- **Post School Outcomes.** Addressing the preparation of SwDs to participate in postschool higher education, competitive employment, and/or some other postsecondary education or training program one year after leaving high school. See, e.g., ED Guidance on Postsecondary Transition, and Pre-Employment Transition Services Activities.
- **OSS and ISS Rates and Risk Ratios.** Improving outcomes, especially for data showing significant disparities for Black students with and without disabilities and grades having significantly higher SwD rates.
- **Attendance Guidance.** See recommendations from the National Center for Educational Outcomes publication, Students with Disabilities & Chronic Absenteeism, to reduce absenteeism. Also see Strategies to Address Chronic Absenteeism, which includes detailed information about early warning systems, mentoring, check and connect, and other behavioral and psychosocial interventions for all students that go beyond notice to or discussions with parents.

- **Young Children's Educational Settings.** Increasing school options for young children without disabilities to enable those with disabilities have more opportunities to receive inclusive experiences.
- **School Aged Educational Placements.** Following up on the root cause analyses for disparate placement rates, including for Black students placed in MPS's two separate schools. Cross reference planning with Section I. Recommendation 1 related to including positive behavior support in the district's MTSS framework, and at Recommendation 1d related to SEL and Support for Positive Behavior. These actions also relate to improving OSS and ISS disparities.

c. Written Guidance and Information

Include in the *Specialized Support* manual (first referenced in Recommendation 2d) areas that will need written guidance and information based on the above implementation plan contents.

- **Chronic Absenteeism.** Clarify in the MPS document shared with the SST that the chronic absenteeism definition relates to 10% of missed school (not 90%).
- **General Education Environments.** Include protocol to guide IEP team decision-making for areas with disparate data, such as those in Recommendation 3a's data review.

d. Differentiated Professional Development

Based on the above Written Guidance and Information supplement Recommendation 1f with PD needed for district and school level personnel to implement Recommendation 3 contents.

e. Data Analysis and Reporting

Supplement Recommendation 1h and subsequent data analysis and reporting with user-friendly reports not currently available showing the type of data reported in this section.

f. Monitoring and Accountability

Supplement Recommendation 1h and subsequent monitoring and accountability actions with relevant KPIs to monitor areas associated with Recommendation 3.

IV. Support for SwD Achievement, Behavior, and Social-Emotional Wellbeing

The prior section focused on achievement and related data that impacts teaching and learning, including the educational environments in which district SwDs are educated. The information in this section addresses ways MPS supports associated activities, focusing on the following nine major areas:

A. Educating Young Children with Disabilities
B. Regular Classroom Instruction with Supplementary SDI
C. Specialized Classroom Programs and Centers
D. Support for Students with Challenging Behavior
E. ELs with Disabilities
F. Assistive Technology
G. Secondary Transition Services and Support
H. Professional Development
I. Family Engagement

Educating Young Children with Disabilities

MPS is one of few school districts that provide early intervention special education and related services to children beginning at birth, in addition to the children with disabilities 3 through 5 years of age who are not yet in kindergarten.

Birth to Three and Early Childhood Education

Achievement and well-being is rooted in early childhood (EC) development. MPS manages the federal early intervention (EI) program that supports families with children birth to three years of age. Based on individual family service plans (IFSPs) families can receive services for their children at home, at an MPS site, or at a childcare setting. Interviewees elaborated that services include parent coaching, and support for such child-based activities as self-regulation, toilet training, temper tantrums, transition, etc.

An advantage of the district's involvement in this area is that MPS personnel are able to build relationships with families early in their children's life, rather than when they are turning 3 years of age, which occurs at most other districts in other states. This unique position has enabled MPS personnel to more easily meet federal requirements to evaluate children and implement their individualized education programs (IEPs) by the time they are 3 years of age. Interviewees spoke highly of the district's program and no issues arose. MPS representatives reported a high proportion of these children are then eligible for special education and related services.

1. Children 3 through 5 Years of Age

School districts with robust EC programs that include a large proportion of children without disabilities in addition to those with disabilities are better able to provide EC within settings that involve both groups of children. MPS's smaller proportion of students without disabilities

challenges the provision of EC inclusive instruction.

As addressed in Section II outcome rates for young children who exited EC at expected developmental levels exceeded SPP targets for one of three outcomes (use of appropriate behavior, by 2 pp). For those who substantially increased their performance when exiting EC they also exceeded SPP targets for use of appropriate behavior (by 2pp) and acquisition and use of knowledge and skills (by 3pp). Three SPP targets were not met. (See Exhibits 3a-b.) A smaller portion of young children were educated in regular classes most of the time (42.3%) than the state (54.8%) and a larger portion were educated in special classes (33.8%) than the state (20.7%). (See Exhibits 3y-z.)

Written Information

The district's website reflected the following programs for this group of students: EC special education (ECSE), EC family education, preschool programs, and teen parent services. However, only the following limited information addressed special education for these young children: accessing screening and evaluations, school locations by program type, and brief reference to EC Special Education (ECSE). Additional information relates to two events (an annual free sale and winter family gathering). The EC Education website does not provide information about EC programs that include SwDs. However, the Preschool Program webpage, which is not linked on the EC website provides information about the following programs.

- Three School. SwDs may attend a half day program with 20 students, one teacher, and two associate educators, depending on space. Students residing in school attendance boundaries receive free transportation. Students with one or more of eight characteristics are prioritized, which includes special education qualification (other than speech-only services); the characteristics do not include home language other than English. Fees that depend on family income and family size do not apply to ECSE.
- High Five Preschool. This program applies to eligible students aged four or five when starting kindergarten the following school year. Students receive a full or half day program depending on location. There is a 20 student per class maximum with one licensed teachers and one associate teacher. The program prioritizes students with the same characteristics as the Three School program. Fees are also waived for ECSE students.
- **Inclusion High Five.** Information about this program was not included in the Three School webpage but was provided to the SST directly. These classrooms offer more specialized support for students receiving special education services. Up to four SwDs can be enrolled through an IEP placement. Students identified after enrollment in the High Five program can remain based on the "educational team's" recommendation. Typically, these SwDs have need for more specialized instruction and support than can be delivered in a regular High Five classroom and have functional communication. (Note: personnel comprising the "educational team" is unclear.)
- Early Childhood Family Education. Various classes are offered for children and their families.

- Teen Parent Services. Various services are provided for teen parents and their children.

MPS also provided a document "New Special Education Leadership Programming Initiatives and Changes" (New SpEd Leadership Initiatives), which will be referred to in other areas of this report, included the following new activities –

- EI to school-age evaluation process to reduce evaluation timelines.
- Placement options visual for families, with additional "language leap groups to programming options, including Spanish and Somali."
- Classroom programming changed from two days per week to five days per week based on age to decrease waitlist.
- Weighted workload for birth to five staff to promote equal caseload counts and increase teacher retention.
- Electronic Certificate of Special Education Fiscal Status (COSF) reporting form.

  Center based ECSE will provide instruction in Spanish and Somali.

Note: these initiatives and changes have explanatory links to Google Docs that would have been helpful to further understand MPS's initiatives, but our access was denied to almost all of them.

Interviewee Feedback

Interviewees provided the following information related to young children and special education. (Note: the term "EC" is used to describe the information below for young children.)

- **Evaluations for Children Transitioning from Early Intervention (EI).** Based on the district's 2022-23 SPP, all qualified students transitioning from EI received an IEP by their 3rd birthday. However, there were concerns that evaluators are strained because of several factors. One factor noted was that screening and EC evaluations take place at the Wilder Complex, which houses the Harrison Educational Center and several other programs. Reportedly, this location is not considered to be family friendly. Apparently, this program moved three times and lacks sufficient space. Also, the process is slower for English learner students due to insufficient interpreters.
- **Availability of PreK Services.** Apparently, the following limitations apply to placement of SwDs in the preK programs described above –
  - **PreK Classes with 20 Students**. Reportedly, two seats are held in these classes for SwDs with IEPs reflecting the appropriateness of inclusive instruction. If a student is enrolled in such a class and is then determined qualified for special education, the student would take one of the two seats assuming the maximum seats had not been met.
  - **High Five Inclusive Classrooms**. There are eight classrooms with four "spots" for SwDs, which fill quickly.
  - **Separate Special Education Programs.** Some 10 schools together have 20 classrooms. Three-year-olds attend three days per week for half days and four and five-year-olds attend five days per week.

- **EC Expansion.** Reportedly, school space is available to expand EC programs, a long wait list exists. Additional capacity is needed to accommodate students with and without IEPs. Apparently, the EC department lacks funds for additional classrooms as various state funds have been exhausted and general funds are unavailable for this purpose.
- **Receipt of IEPs during School Year.** Students newly special education qualified during the school year who do not need a separate classroom for instruction to meet their needs may find that all EC classroom spaces are filled. These students then become eligible to receive home services. These students as well as students enrolled in community preK programs receive itinerant instruction for about 3 to 5 monthly sessions, 45 minutes per session. In some cases, newly qualified students may receive education in a separate special education class.

- Currently, MPS uses the Bid Day for PreK curriculum, which reportedly is out of print and an alternative is being explored.

Special Education Placement

As a preliminary matter, we reviewed MPS's process for identifying schools for SwDs new to the district or needing a different school to implement an IEP. Here, the MPS board of education approved the Special Education Placement Policy 5741 (SEPP). The policy is based on four controlling principles. In pertinent part, "Special education students, like general education students, are entitled to receive educational services immediately upon registering in MPS." MPS has established a Placement Center for all students in these circumstances, including SwDs. Interviewees shared the following comments related to SEPP implementation –

- The placement center, which has a small staff, is the first stop for all new students. Parents then must go to a potential school to submit necessary documents, e.g., birth certificate, etc., and complete numerous forms with redundant information. Some schools require an appointment and others allow walk-ins.
- Most schools have staff that can conduct the MN language survey for EL students.
- For students with outdated IEPs, personnel must contact the prior district to develop an updated IEP. Reportedly, the student does not attend school until the document is received.
- Guidance is not available to support placements of new students with obvious and/or complicated health issues or disabilities who arrive at the placement center without documentation to support special education qualification or an IEP, require a wheelchair, etc.
- Reportedly, schools have sometimes pushed back recommendations for student placements.

Regular Classroom Instruction with Supplementary SDI

The great majority (75%) of MPS's SwDs are educated in regular classrooms more than 40 percent of the time, and 50 percent are in this environment at least 80 percent of the time. These students typically participate in regular statewide assessments, but with an MPS reported 2024 proficient or above rate (23.4%) their performance was far below all student rates for reading (40.1%) and math (34.7%). SwD rates would be even lower if their participation rates met the 95

percent federal requirement. (See III. Data Impacting SwD Achievement at Exhibit 3c and 3d.)

For SwDs to increase their achievement on statewide assessments, they must be taught core curricular instruction by their general education teachers using strategies that enable them to learn. Special educators use specially designed instruction (SDI) to supplement general education instruction and address students' areas of need not included in their grade level curriculum. Tier II and Tier III general education interventions may also benefit SwDs, in addition to SDI, to help accelerate achievement. These actions require the coordination of general and special educators, along with special education assistants and related services personnel.

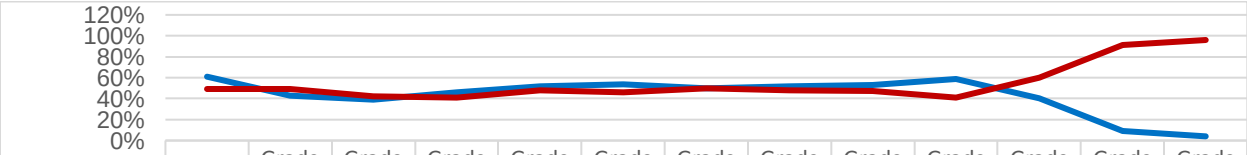
1. Written Information

We asked MPS to provide information about 1) instruction aligned with core standards and 2) for EC and school-aged SwDs initiatives to increase inclusive education with high quality instruction in general education classrooms, including literacy and math for students two or more years below grade level, any monitoring activities, etc. The district's responses are summarized below.

Screening Data

Exhibit 4a. 2023-24 Fall and Spring Screening Rates, which was included in the district's 2024-25 Literacy Plan, show proficient or above rates for kindergarten (KG) through 12th grade students. These data show that between KG and 9th grade, all rates decreased at all grades except for 6th grade where they remained constant. According to the Literacy Plan, optional screening at 10th through 12th grades deflated student counts so these rates may be biased as a result. Although the data table had columns for student numbers screened and identified with Dyslexia criteria, this information was not reported.

Exhibit 4a. 2023-24 Fall and Spring Screening Rates



	KG	Grade 1	Grade 2	Grade 3	Grade 4	Grade 5	Grade 6	Grade 7	Grade 8	Grade 9	Grade 10	Grade 11	Grade 12
Fall	61%	43%	39%	46%	52%	54%	50%	52%	53%	59%	40%	9%	4%
Spring	49%	49%	42%	41%	48%	46%	50%	48%	47%	41%	60%	91%	96%

Instruction Aligned with Core Standards

Various relevant documents were provided related to literacy and math instruction aligned with core standards. Some of this information was summarized above in Section I. MTSS to Accelerate Student Achievement and Wellbeing. The following supplements that information –

- **2024-25 Local Literacy Plan**. This document provided very detailed information about the district's READ Act implementation. It included screening tools, assessment areas, and data collection schedules. The literacy plan also includes –

  - By grade curricular material, its purpose, and delivery methods, such as 80 minutes for whole class and 40 minutes for differentiated instruction.
  - K-5 educators receipt of ongoing training in small-group interventions.
  - Adoption of new grades 6-12 intervention curriculum that aligns with science of reading and addresses foundational skills gaps identified by diagnostic and screening data.
  - READ Act professional development for both general and special educators.
- **Literacy and Math Multi-layered Practices Guide 2024-25.** The Guide supplements the Literacy Plan by referencing MTSS Tier II and Tier III intervention delivery models with group sizes and minutes per day or per week, e.g., for Tier III, KG through 5th grade, groups of three or fewer students for 30-60 minutes per week, 5 days per week. The student group number increases and service minutes decrease for 6th through 8th grades and for high school: 15 or fewer students for 30 minutes, 3-5 days per week. Importantly, for schools with over 50 percent of students below grade level, the Guide calls for double dose courses with one for core instruction and another for material supplementing the core.
- **Elementary K-5 Literacy.** Pages for literacy resources and interventions were blank; a section for MPS Special Education subject was blank also.
- **MPS 6-12 ELA Target Skills and Power Standards** provided relevant information for these topics but lacked instructional strategies, including those for SwDs.
- **Special Education Department Information.** An excel document listed eight programs for SwDs taking regular state assessments, including one for Spanish-speaking students found to have dyslexia. Other programs included several based on the Orton-Gillingham multi-sensory model. Listed programs included several that were absent from documents referenced above (Max Scholar, Read Naturally, Reading Mastery, Read 180, System 44, and Steps to Advance). While these programs may be useful, it was not clear to the team that there is a pattern of consistent usage across the district that would support efficient professional development (PD) and district office support.

Other than special education department's listed programs, none reflected information about how they could be used for SwDs. For example, information does not address the inclusion of SwDs in tiered interventions when their activities are aligned with other student needs. Braided funding is available to address any funding source issues. Students with a need for more intensive instruction can be included in or educated separately from Tier III interventions with SDI. For example, see the Center on MTSS website and use the search function with such terms as IEP or special education to find useful information.

Inclusive Instruction

Regarding initiatives to increase inclusive instruction, we received information summarized above for the EC High Five program. Additional information was not provided about school-aged SwDs regarding general educator training or support for them to teach core instructional lessons

from which their SwDs will benefit with and without special educator support.

Standards of Effective Instruction (SOEI) Aligned Special Education Tool

The district's report of New SpEd Leadership Initiatives included the development of an "SOEI Aligned SPED look for observation tool" to support teachers and administrators. The report indicated the tool was piloted during Spring 2024 and was pending "SELM" approval. Because our access to the tool's link was denied we were unable to review the document.

According to the district's Human Resources website

> instructional specialists (ISs) conduct secondary observations (including pre- and post-observation conferences) utilizing SOEI as part of the district's teacher evaluation model. In addition to secondary observations, ISs also coach and connect teachers to resources, co-teach and model teaching strategies, design and deliver professional development modules to schools based on needs, and help facilitate Professional Learning Communities or data cycles."

2. Interviewee Feedback

The following information summarizes Interviewee feedback –

- Regular quarterly data checks by principals to discuss student data includes special education representatives.
- While there are principals who reinforce the principle that SDI is to supplement core instruction, this practice is not universal.
- The UFLI intervention is not used by special educators, including those working as resource teachers. Note: the UFLI Foundation has posted special education intensive intervention model lessons. Special educators reportedly use the K-5 Bridges Intervention.
- Although the Assessment and Learning in Knowledge Spaces (ALEKS) has been used for students in 6th through 12th grades, the iReady math intervention will be used instead to be consistent with general education. The Excel sheet shared by the special education department listed ALEKS to support learning in unspecified courses.
- The roll out of instructional materials has not consistently included special educators and their students who participate in regular assessments, including those educated in separate special education programs.
- Concerns were expressed about instructional materials for SwDs that were not textbook based and special educators being told to adapt materials without additional assistance. There were also concerns about having sufficient materials for writing instruction.

Specialized Classroom Programs and Centers

Based on information MPS provided, the district has five major special programs in schools and special school centers. These are called School Based, and specialized programs for ASD, DCD, and EBD. Two other specialized programs are DHH and CLASS/Life Skills. Generally, there is an

apparent lack of high-quality indicators for specialized programs that drive and show through monitoring implementation. Three program names (EBD, ASD, and DCD) are not based on neutral terminology and student common needs; rather they are based on categorical disability labels (i.e., EBD), that are not student or family friendly and implies placements are based on this factor alone when an IEP reflects need for a specialized program.

1. Specialized Program Data

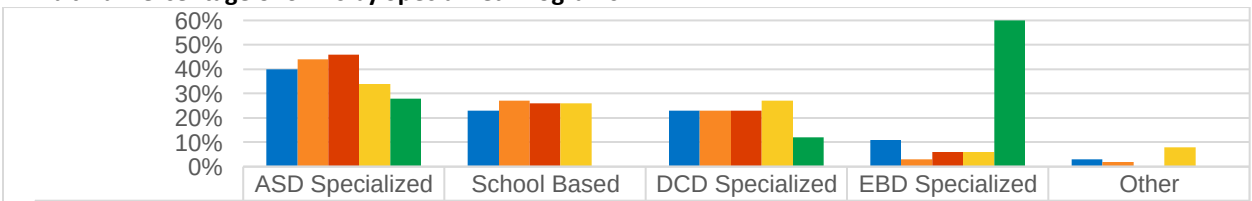
The information below describes the proportion of SwDs by specialized program, and the number of program classrooms by number of schools.

SwD Rates by Specialized Program

Figures in Exhibit 4b. Percentages of SwDs by Specialized Programs show rates by grade level. (Note: K or 6 refers to schools K to 8 and 6 to 8; 6 or 9 to 12 refers to schools 6 to 12 and 9 to 12.)

- **ASD Specialized.** With an overall rate of 40 percent, rates were highest for K and 6 to 8 (46%), and lowest for 6 and 9 to 12 (34%) and special centers (28%).
- **School Based.** With an overall rate of 23 percent, rates by grade level were about the same (26% to 27%).
- **DCD Specialized.** The overall rate of 23 percent was matched at all grade levels except for 6 or 9 to 12 (27%) and special centers (12%).
- **EBD Specialized.** Grade level rates were far below the total rate (11%), with special centers showing most students (60%) educated in this program.

Exhibit 4b. Percentage of SwDs by Specialized Programs



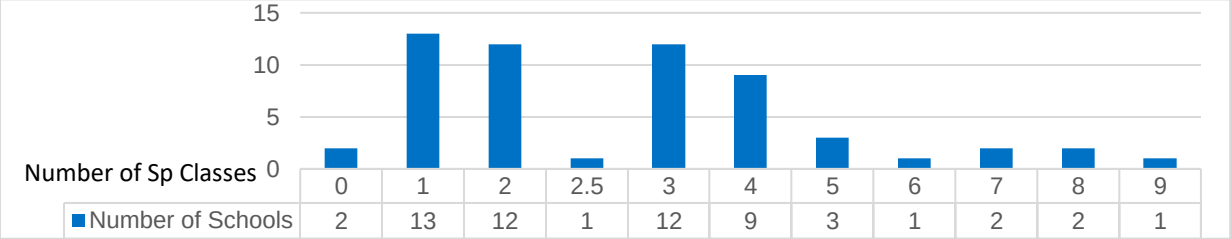
	ASD Specialized	School Based	DCD Specialized	EBD Specialized	Other
All	40%	23%	23%	11%	3%
K to 5	44%	27%	23%	3%	2%
K or 6 to 8	46%	26%	23%	6%	
6 or 9 to 12	34%	26%	27%	6%	8%
Special Centers	28%		12%	60%	

Number of Specialized Program Classes by Number of Schools

Data shown in Exhibit 4c. Number of Specialized Program Classes by Number of Schools show the large disparity between schools that host these programs. Overall, 2 schools housed no special program. Forty-six percent of classrooms were in schools that hosted 1 classroom (2 schools) to 12 classrooms (3 schools). The remaining 32 percent reflected: 4 classrooms (9 schools), 5 classrooms (3 schools), 6 classrooms (1 school), 7 classrooms (2 schools), 8 classrooms (2 schools), and 9 classrooms (1 schools). These figures do not include the two special centers that together have 25 classrooms.

Note: typically, schools with more specialized classrooms have a larger portion of SwDs having more intensive needs, more transportation issues, more complex IEP meetings, etc., compared to schools with fewer classrooms. Further analysis of this data by school grade levels would help to assess their equitable distribution.

Exhibit 4c. Number of Specialized Program Classes by Number of Schools



2. Instructional Materials and Support

In response to our request for information about any district initiatives designed to improve instruction for students educated in separate classes who take regular or alternate assessments, and descriptions of MPS specialized class programs, district representatives provided the information described below.

Levels II and IV Instructional Programs

Six of the 23 instructional programs MPS described were listed by content area pertaining to students educated in Federal Settings III (general education less than 40% of the time) and IV (separate classroom). Edmark supports literacy, Vizzle supports math and literacy, and Equals Math supports students with significant intellectual disabilities. Also, three programs support functional communication (N2Y, STAR Kits, and Unique Learning systems). Finally, three programs support SEL (Calm Connect, Superflex, and Mind Up). Additional information was not provided about training for special educators and special education assistants (SEAs) charged with their use or monitoring of their usage.

Universal Sensory Room Project

Listed in the SpEd Leadership Initiatives document, this project was listed as a new project with the explanation that many buildings have sensory rooms or space that were not equitably furnished across the district. Implementations also were not consistent across all sites based on specialized programs. However, we were unable to read more about the project to understand its scope, training for it, and monitoring of its use because access was denied.

3. Specialized Programs in Regular Schools

The following information was provided for five specialized programs hosted in regular schools.

School Based Program

MPS provided a Guidance Document for this new program that included detailed information. The Guidance described the program as multi-categorical for students with intensive academic and/or behavioral and social-emotional learning needs. Eight-to-12 students are enrolled with

one special educator, two SEAs, and a .2 FTE social worker. Guidelines describe differentiated and accessible core instruction, standards- and skills-focused IEPs, SDI, assessment data, progress monitoring, and case manager role. Also, guidance is provided for SEL, sensory materials, and assistive technology. No information was included about support for students' behavior challenges.

The program allows for site-level autonomy to provide services based on the learning needs of each school's students. Building administrators and special education directors "should connect" to confirm each program's focus area.

Additional Specialized Programs

Like the SB program, the four programs described below also enroll 8 to 10 students and have one special educator, and two SEAs.

- **ASC Specialized**. This program supports students on the autism spectrum. SDI may include general accommodations or emphasize functional academics in daily and independent living, communication, community participation, recreation and leisure, and work and work-related skill development.
- **DCD Specialized.** The program emphasizes functional and academic skills with an alternative curriculum for students with developmental disabilities.
- **CLASS/Life Skills.** The program educates students with multi-categorical disabilities and unique academic needs. Its description is not much different from the two directly above.
- **EBD Specialized.** For students with intensive social and emotional needs, small group settings are used to identify triggers and social and emotional skill deficits that prevent social and academic progress. Once identified, staff implement intensive research-based intervention strategies for students learning and practicing in isolation to generalize their learning across school settings. Goals are for students to increase levels of independence in self-awareness, self-management, and decision-making skills.

4. Special Education Placement Policy (SEPP) and Procedures

SEPP procedures detail requirements for transitioning students between resource and specialized programs. While many of the requirements related to a review of students' current services and their adequacy are typical of other school districts with which we have experience, MPS also requires seven documents to be sent to the relevant special education program director or designee. The person reviews the information to ensure its sufficiency for IEP team consideration. With sufficient information, notice is sent to the current school with identified program option(s). Staff from the current and potential new school jointly develop a new IEP. If the information is not sufficient, deficiencies are communicated back to the school for correction or further student intervention.

We note these procedures do not include a time frame for program director review, which could potentially lead to delayed IEP team decision making. Also, the procedures do not differentiate

requirements for Level III and the more restrictive Level IV setting, for example, including an observation of the student's current circumstances and support being provided. We also note that even with this oversight, MPS reported higher rates of students in Level III settings (21% compared to the nation's 13%) and Level IV settings (3.4% compared to 2.6% for the nation).

5. Regular School Specialized Program Interviewee Feedback

Interviewees shared the following comments –

- Procedures governing student movement to Level III and to less restrictive settings are not well understood, are viewed as confusing, and place an undue burden on case managers for documentation. There is a perception that students remain in Level III settings once placed, and that special education directors do not consistently apply the SEPP procedures. Questions arose about who actually makes placement decisions.
- With SEA assistance, students in Level III classrooms have been able to participate in activities with nondisabled peers, such as lunch, etc. However, there is a desire for SEAs to receive the training they need to be more effective, especially when they have no experience with the characteristics and needs of students they are supporting. Special educators provide some training, but it is limited given time constraints.
- Several concerns were raised that involved denial for requests for an additional SEA for various reasons, e.g., large numbers of students with ASD and OHD/ADHD, students with behavioral challenges, students in classrooms with five-year achievement spans, etc. Anecdotally, staff were told to adjust SEA schedules absent school observations by individuals reviewing the information to understand underlying student needs. The Request for Additional Adult Assistance form is used to initiate this review. . (Note: the Additional Adult Assistant Request form is used to document the basis for this need, which is based on the student's IEP and the extent to which school personnel demonstrate current resources are insufficient to meet the IEP requirements. Two observations by the school's due process facilitator (DPF) are needed to support the request.)
- Various unique service models were described, such as one applying a specialized program staffing model (for students who had been in such a program) to a co-taught general education class. Unique models were met with negative special education administrative reaction, resulting in students' return to separate class instruction. (Note: other districts with which we have experience have used this funding model to support less restrictive placements for students who would otherwise require a specialized program.)
- There is desire for more support for students with behavior that interferes with instruction. Also, there is desire for basic PD and support for inexperienced special educators to better understand and meet their students' needs.
- Not unique to MPS, concerns arose about classroom students with large reading level differences and access to appropriate reading materials for outlying readers.

6. Special Education Centers

MPS has two special education centers enrolling only SwDs. MPS data shows River Bend educates 68 students in K-8th grades and Harrison educates 47 students in 9th-12th grades. The two schools are located near each other, separated by a parking lot. Information below describes various demographics for the schools, written information shared with MPS or available on school websites, and interviewee feedback. MPS's Metro Services in coordination with Catholic Charities also educates students while in day treatment programs. Information is provided further below.

River Bend and Harrison Racial/Ethnic Demographics

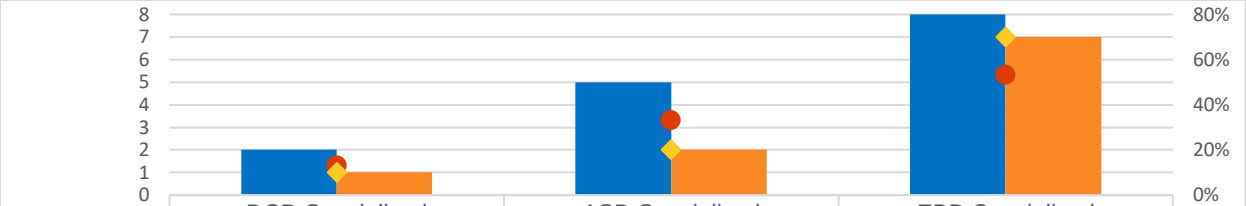
Both River Bend (K-8) and Harrison (9-12) educational centers' Black student compositions far exceed MPS's (38%) composition. River Bend's Black students comprise 66 percent of its enrollment and Harrison's comprise 70 percent. As previously reported in Section III. Data Impacting SwD Achievement at Exhibit 3hh. Harrison and River Bend Black Student Risk Ratios Over 2.5, River Bend's risk ratio is highest for all Black students (6.5), followed by those with EBD (4.9) and then ASD (3.9). Harrison's risk ratio is also highest for all Black students (5.4), followed by those with ASD (2.6), and then by EBD (2.5).

Based on interviews, both schools' EBD Specialized program enrollments are about 95 percent male. Limited funds prevent an expansion of Office of Black Student Achievement activities to include these sites.

River Bend and Harrison Classrooms by Program Type

With three specialized programs housed at River Bend and Harrison, MPS data in Exhibit 4d. Number and Percentage of Programs by School show both schools have a majority of EBD specialized classrooms: River Bend has seven (53%) and Harrison has eight (70%). The schools have a smaller number of ASD specialized classrooms: River Bend (5) and Harrison (2). Both schools have few DCD specialized classrooms: Riverbend (2) and Harrison (1).

Exhibit 4d. Number and Percentage of Programs by School



	DCD Specialized	ASD Specialized	EBD Specialized
River End	2	5	8
Harrison	1	2	7
River End	13%	33%	53%
Harrison	10%	20%	70%

River Bend Education Center

The SpEd Leadership Initiatives document referenced a 2022-23 transition plan that enabled River Bend, which previously educated K-12 students with EBD, to operate through 8th grade only.

Students then transitioned to Harrison (grades 9-12). Parents of River Bend students with high school ages had the option of graduating from their current school or to attend Harrison.

According to interviewees, behavior is the major reason students are placed at these schools. Special educators in the ASD and DCD programs address core instruction using station work and grouping students to the extent possible by ability. Instructional materials include Functional Phonics and Strategic Adolescent Reading Intervention (STARI), and Unique Learning. Also, all teachers receive or will receive LETRS training. The school also has three social workers.

Harrison Education Center

According to its website, the Center prepares students for college, career and life, and is authorized for the IB Middle Years Program (MYP) for grades 9th through 10th. Students then enroll in either the IB Career-related Program (CP), which focuses on a career pathway in business, computer science, graphic arts, and music, or enroll in the IB Diploma Program (DP), which focuses on rigorous liberal arts coursework. Harrison also offers Advanced Placement courses and exams and concurrent enrollment options with Mankato State University, Minneapolis College, and the University of Minnesota.

Interviewees shared the following feedback –

- The transition of students to Harrison has worked well. Even though staff with positions that transferred to the new site took other job offers, new staff were hired. Instructional materials followed the students and staff members received professional development.
- The Center also provides a 45-day Interim Alternative Educational Setting (IAES) for SwDs removed from home schools for disciplinary reasons in accordance with IDEA procedures. After 30 days Center personnel discuss with the home school and family plans for transition.

Metro Ed Services

According to this program's website, in partnership with Catholic Charities, students receive education and treatment at the Wilder Complex. The Day Treatment program serves students residing in the Metro area, most of whom had attended an MPS school. All students have disabilities in K-8th grades. For half of each day students receive ELA, math, and writing instruction; for the other half they participate in social skill and treatment groups. Based on January 2025 MPS data, 28 students attended this program.

Interviewees shared that students enter the program after their intake through Catholic Charities program, and they typically remain for 15 to 18 months. Three classrooms area available for each half day of instruction. There was an expressed desire to increase the school's capacity for MPS students entering high school, using the facility's underutilized space. Without this option, students must attend a regular high school to continue their education while attending the Catholic Charities' half day treatment program. Metro does not have sufficient staff to visit the receiving school or follow students' high school progress.

Support for Students with Challenging Behavior

In March 2018 the U.S. Government Accountability Office issued a report finding Black students, boys, and SwDs were disproportionately disciplined (e.g., suspensions and expulsions) in K-12 public schools. These disparities were widespread and persisted regardless of the type of disciplinary action, level of school poverty, or type of public school attended. Reported research found students experiencing disciplinary removals from school were more likely to repeat a grade, drop out of school, and become involved in the juvenile justice system.

For additional contextual information, Section III. Data Impacting SwD Achievement reported the following –

- Black SwDs were 4.93 times more likely than other SwDs to be suspended for more than 10 days. (See Exhibit 3s.).
- SwDs received higher rates of OSSs over 10 days in grade 6 (22%), grade 7 (19%) and grade 8 (26%) compared to SwDs in other grades (ranging from 0% to 11%). (See Exhibit 3r.)
- While 0.5 percent of SwDs received an ISS for up to 10 days, much higher ISS rates occurred in grade 6 (20%) and grade 7 (21%). Rates for other grades were much lower, ranging from 1 percent to 12 percent. (See Exhibit 3u.)
- Risk ratios of 23.3 for OSSs of one or more days and 71.2 for more than 10 days. American Indian students with no disability had a high risk 8.5 risk ratio for OSS of more than 10 days. (See Exhibit 3s.)
- Black students without disabilities had a 19.7 risk ratio for ISSs of no more than 10 days. (See Exhibit 3t.)

1. Written Information

We asked MPS to provide information describing the types of support offered to schools for students, including SwDs, who exhibit behavioral challenges described to be beyond the expertise of school personnel. MPS responded with the SwD documents listed below, which were described as being systematic and aligned. (The School Based Program was previously described and we were unable to access the Behavior Support Guidance document.)

- **K-12 DPF Behavior Specialist Workflow**. This document lists steps to work through with the school's assigned special education DPF prior to requesting a behavior specialist's support for, e.g., development of a functional behavior assessment (FBA) or behavior intervention plan (BIP), data collection process, targeted training for behavior intervention and proactive strategies and tools, asynchronous training and tools, consultation, direct coaching and collaboration, observations, etc.
- **Recommendations for Intervention Best Practices Guide.** This Guide identifies behavior related protocols to strengthen a student's IEP, online SEL curricula (Wayfinder, Amaze, Be Good People, and Harmony SEL), five curricular materials for SEL (including one for functional communication), 14 resources aligning with the BIP format (prevent/teach/reinforce), and 7 professional development sessions on behavior, data, and intervention.

- **New FBA Process.** The special education department revised its FBA process, which we were unable to access. The new process was designed to address issues department personnel and community members raised as concerns.
- **45-Day IAES Transition Prioritizes Home School.** The new interim alternative educational setting (IAES) procedure prioritizes a student's return to the home school, or school of choice for better educational outcomes. The procedure also addresses an IEP team decision for the student to remain at the IAES location.

The list of special education activities listed above are typical of those used by other school districts with which we have experience. However, they depend on having sufficient personnel, such as behavior specialists, available to respond. Also, as discussed above in Section I. MTSS to Accelerate Student Achievement and Wellbeing, MPS's lack of an overall positive behavior support approach for students with and without disabilities limits the availability of trained staff to support schools and creates a disproportionate reliance on special education personnel for this purpose.

2. Interviewee Feedback

Interviewees shared the following regarding support for students with challenging behavior.

- MPS has moved toward better integrating SEL and academic instruction.
- Student behavior appears to be progressively more challenging. There was a desire for additional classroom SEAs to support teachers and their students with the most intense behavior. Another theme was the need for additional PD to improve proactive measures designed to decrease serious behavioral incidents. (Note: these issues have been consistently raised during past Council SST special education reviews.)
- Two consultation models are used with one to address disproportionality issues and the other to support schools with behavior challenges. Behavior specialists work to build the capacity of DPFs who have an assigned group of schools to support; however, it is difficult for behavior specialists to collaborate with individuals within and outside of the special education department with different reports and layers of supervision to navigate. One behavior specialist position transitioned to two board certified behavior analysts (BCBAs) who work across the district. (Note: the special education department organizational chart we received included only two behavior specialists "to be named," which raises capacity issues.)
- The special education department has conducted training for Indian Education personnel about basic special education due process procedures, including the manifestation determination process so they are better able to inform families. (Note: although it is important for staff and families to understand relevant procedures and student protections, these comprise reactive measures following an incident rather than proactive measures to better support students' positive behavior.)

English Learners with Disabilities

Overall, English learner students comprise 28 percent of all MPS students. ELs with disabilities

(ELwD) comprise a much smaller composition of all EL students (12%) and of all SwDs (17%). (Exhibit 2i) The ELwD rate increases from kindergarten (10%) to 1st grade (14%), then becomes variable increasing and decreasing, ranging between 13 percent (2nd grade) and 10 percent (4th and 9th grades). (See Section III. Exhibit 2j.) Using a risk ratio measure, ELwD are 3.17 times more likely than non-ELwD to be placed in a DCD Severe/Profound program. (See Section III. Exhibit 2l)

1. Written Information

We asked MPS to provide information about initiatives to support EL students' increased achievement while in general education, including literacy and math instruction aligned with the core curriculum, and how these students receive English language acquisition support while in regular and specialized program classrooms. MPS's response contained the following –

Dual Eligible Collaboration Tool

This PowerPoint presents information about ELwDs and a collaborative tool for students' EL and special education teacher to develop IEPs and EL service plans that align to IEPs. The tool includes information for ELwDs educated most of the time in general education classes and in specialized programs, along with resources. Information is provided about EL development goals for oracy and literacy, and a plan example. A May 28, 2024 article published in the MinneTESOL Journal provides additional descriptive information.

New Multilingual Position to Support Dual Eligible Students

This new position is intended to support dual eligible students through a collaboration between the special education and multilingual departments. A wide range of position responsibilities include support for acquisition of assessment, curriculum, and instructional materials for ELwDs; providing expertise for special education assessment and evaluation of ELs; and providing PD to staff across departments. The individual serves as an EL-focused resource to the special education leadership team for best practices and research and disseminates information to district staff, and other duties as assigned.

Additional Information

MPS's response also referenced -

- A new center-based ECSE program available in Spanish and Somali (in addition to Spanish).
- Esperanza instructional materials, which is based on an evidence-based curriculum designed to improve literacy skills for Spanish-speaking and bilingual students identified with dyslexia.
- A new process for dual language special education identification; however, the content was password protected.

2. Interviewee Feedback

Interviewees generally addressed the provision of EL support overall, without specifically addressing support for ELwDs. Their summarized comments are below -

- Bilingual instruction is provided only through dual language programs at three schools that

feed into one high school. Due to waiting lists, many newcomers are unable to attend these programs.

- Typically, teachers provide English language development (ELD) through English to Speakers of Other Languages (ESOL). Other approaches include push-in ELD support, co-teaching, and bilingual associate educators, but this support is negatively impacted if various positions have been cut.

Assistive Technology

Assistive technology (AT) refers to any device, software, or equipment that helps SwDs perform tasks that they might otherwise find difficult or impossible. Under the IDEA, when developing an IEP, teams are required to consider each student's need for AT devices and services, which may include training or technical assistance for the student or, if appropriate, the student's family. On a case-by-case basis, the use of school-purchased AT devices for home or other settings is required if the IEP team determines the student needs the device's access to receive an appropriate education. Students may take their AT devices home. Interviewees did not share any concerns or additional feedback. The special education department's website does not include any information about this topic. See for example the Chicago Public Schools' AT Resource Center webpage. MPS provided the following written information.

Assistive Technology Center

MPS has an AT Center (ATC) that supports evaluations to determine if a student requires AT and, if so, what kind. For eligible students the ATC assists school staff to acquire appropriate equipment and training. According to this information, a variety of hardware, software, and special equipment are available to students at any MPS site for as long as needed. MPS shared outdated information about its work in this area: "As of April 15, 2018, ATC had over 700 work requests for adaptive equipment."

Assistive Technology Program

This program, which has existed for 32 years, relies on a volunteer base including some with the program for 25 years. In addition to volunteers building, finishing, or positioning equipment for students, they also write how-to manuals for every piece of equipment in the program.

Secondary Transition Services and Support

Secondary transition for SwDs in Minnesota begins no later than 9th grade and can extend until the age of 22 years. "Transition services" or "transition planning" is a coordinated set of activities designed to help the student achieve successful post-school outcomes. These activities:

- Focus on improving both academic and functional skills to support the student's transition to post-school activities, such as postsecondary education, vocational training, employment, adult education, independent living, and community involvement.
- Address students' individual needs, strengths, preferences, and interests.
- Include instruction, related support, community experiences, employment development,

adult living goals, and, where appropriate, life skills training and vocational evaluation.

As previously reported, of students who had an IEP at MPS, one year later 61 percent were enrolled in higher education, competitively employed, and/or engaged in some other postsecondary education and training program. This cumulative rate fell below the SPP target (by -15pp) and below the MDE rate (72%). (See Section III. Exhibit 3p.)

1. Written Information

In response to our request for descriptions of activities and services to support students' post-secondary success, including access to community-based work experiences, MPS shared a detailed 11-page transition IEP document for students in 9th grade and above. The document includes IEP team guidelines with sample plan descriptions.

Although not included in the above information, an excellent MPS special education webpage shared useful information about the following relevant work-related areas –

- **Community Based Career Internship Opportunities.** Seven sites were listed as offering internships opportunities for SwDs: Agape Child Development Center, Anchor Java, Catholic Eldercare, Dairy Queen, Koehler & Dramm Wholesale Florist, North Market (non-profit grocery and social service enterprise), and VA Medical Center. To participate, students at least 16 years of age are required to take the "Investigating Careers Course." A job coach supports students at some job sites.
- **Transition Plus.** For students between 18 and 22 years of age who decide to continue their education with MPS to work on unmet IEP goals, Transition Plus focuses on post-secondary education and training, employment, and independent living to promote a successful transition from high school to adult life.

2. Interviewee Feedback

Interviewees shared the following –

- With four work coordinators for the Transition Plus program, there was a desire to increase students' access to work experiences, have indicators for success, and to have a site counsel with former students to share their work experiences.
- At MPS, primarily SEAs support students at job sites, compared to St. Paul Public Schools that has a dedicated group of job coaches.
- Reportedly under consideration is a School Improvement Plan goal to support SwDs' preparation for postschool competitive employment.
- Students with more severe or profound disabilities usually receive waivers to attend a day program, which does not include community work experiences.

Professional Development

MPS's special education sponsors and provides a wide variety of professional development (PD) opportunities. Nevertheless, as we have heard in all of our other special education reviews, MPS

interviewees reported the need for more targeted PD, especially for general and special educators, and SEAs.

1. Written Information

We asked MPS for information about PD, including the number of days available for staff development (school-based and district-wide) and any current policies regarding mandatory nature of any PD for special education and other personnel; and the extent to which general, special education and EL administrators collaboratively manage PD. Although information specific to the above was not shared, we received a list of the following new special education department initiatives to expand access to professional learning. Reportedly, these included embedded universal design for learning (UDL) as a through line for PD.

- **PD Structure.** Created a through line theme for year-long teacher PD. The special education department has a planning committee, which meets biweekly to determine PD's structure and content. A spring survey to all special educators gathers feedback on PD content. The committee uses this data to plan the next year's PD scope and sequence. The PD Planning Document shared with the Council SST was for the 2023-24 school year and contained 80 courses sorted for all staff; ECSE (with one course); elementary; secondary; and related services personnel. Course offerings included inclusive practices, job alike strategies and collaboration, and other relevant topics.
- **Professional Instruction Center (PIC) website.** Updated the PIC website to make it more user friendly and accessible for teachers. The website includes digitalized Interventions and curriculum, aligned literacy practices with the MN READ Act and the Science of Reading, and bolstered the SEL special education curriculum in collaboration with the SEL department. (The website link provided was password protected.)
- **Community of Practice Connection.** Relaunched the Community of Practice connection, which provides opportunities for PD from the community and content experts. (A linked document was not shared.)
- **Support to Schools.** Collaborated with 10 MPS departments to provide monthly training to the department's school support team. Participants receive CEUs for their training. (The website link provided was password protected.)
- **Bolstered Asynchronous Training Offerings**. Developed 10 courses, which included a special education learning series with comprehensive literacy training (blocks 1-4); disability awareness; equitable evaluations; actionable IEPs; introduction to restrictive procedures; EdPlan Fundamentals; Read & Write training and student activity guide. (Note: these topics did not include any proactive strategies to address students' challenging behavior.)
- **Aligned Dual Immersion Special Education Sites** with curriculum and PD consistent across sites to support teachers and students.

2. Interviewee Feedback

Interviewees provided the following feedback about the receipt of PD–

- MPS schedules four days of PD during the school year, with three that are district directed and one that is site directed. Most training is voluntary, with some occurring after school (with $25/hour payment) and none occurring on Saturdays. The team was told that funding for substitutes does not apply to all PD, making it more difficult for some personnel to attend. However, LETRS training is mandatory for most special educators.
- Minimal training is available for SEAs who are new to their role, and general educators need training to enable SwDs to benefit from core instruction.
- There is need for staff training to better use such platforms as EduClimber, FastBridge, and other tools to track and act on data related to achievement and behavior; and for special educators with nontraditional pathway certification.
- The talent development department (housed in the human resources office) oversees districtwide training, as well as teacher evaluations, coaching and mentoring. The department follows Guskey's Five Critical Levels of PD Evaluation, which has five areas of evaluation (from participant's reactions to student learning outcomes). Informing data comes from typical questions answered, typical information gathering methods, what is measured and assessed; and how information will be used.

Family Engagement

Reflecting the importance of parental participation in their children's education, a federally required state performance plan (SPP) indicator measures the following: SwD parents reported school personnel facilitated their involvement as a means of improving services and results for their children. Based on the latest 2020-21 most recent results, MPS's rate of 77.08 percent exceeded the SPP target (71.5%), and the MDE rate (66.3%). MPS provided no information responding to our request for information about support for parents to meaningfully participate in IEP meetings. Interviewees shared the information below.

Special Education Advisory Council (SEAC)

As required under Minnesota law, the SEAC provides input on special education issues to MPS. Its purpose is to advise and advocate, not to decide policy. At least half of the designated SEAC members must be parents of SwDs.

According to the New SpEd Leadership Initiatives document, the department "reimagined" the SEAC structure by scheduling it during the day. Generally, SEAC is having difficulty encouraging parents to attend their meetings. In the past, some 20 individuals participated; however only four or five attended the last meeting and staff outnumbered parents and family members. MPS personnel no longer facilitate robo calls to families about SEAC meetings, which are believed to be more effective than emails. To attract more participants, different meetings times were arranged with limited success. Virtual meetings were also arranged but in-person meetings produced higher levels of engagement. Hybrid meetings were also tried but were difficult to

manage.

Various special education directors meet with SEAC's co-chairs to plan each meeting and to help arrange translation and refreshments. There is a desire for one consistent director to liaison with SEAC, which was prior practice.

Positive Feedback

MPS's emphasis on and appreciation of diversity was viewed positively. There was also an appreciation of the special education department's leadership team (including its executive director), which was viewed as responsive to parent concerns. Anecdotally, one high school was called out for its inclusivity, however this practice was not seen as consistent across the district.

PACER

The 30-year-old Parent Training and Information Center receives funding from the US Department of Education's Office of Special Education Programs. PACER is primarily staffed by parents of children with disabilities. The organization is dedicated to educating other parents and improving the lives of families and children. PACER no longer has capacity for individual advocacy but continues to provide some ongoing parent training. Interviewees indicated they have received a higher incidence of callers reporting that school personnel advised them to contact the organization and other nonprofits for information; sometimes school personnel call also.

School-based Family Liaisons

There is a desire for school-based family liaisons to reach out to parents of SwDs and distribute information about special education due process procedures and nonprofit organizations that could support parents. Interviewees emphasized that even though MPS staff have been supportive, the special education process is difficult to understand.

Concerns

The following areas were raised as concerns.

- Too often IEP meetings only focus on student deficits, which frustrates and alienate parents who then feel like their children are not capable.
- Parents do not feel they are consistently respected at IEP meetings and that their participation matters. This concern is especially applied to parents requiring interpreter services for less common languages and dialects.
- Some perceive that students remain in more restrictive environment because of insufficient staff support.
- Parent confusion about students' transition from IEPs to 504 plans gives them the impression that their children are losing support they need.
- Reportedly, there is no process for parents with disabilities to formally request accommodations for IEP or other meetings.

Recommendation 4. Accelerate SwD's achievement with improved instruction, behavioral, and social-emotional supports to accelerate learning.

Low achievement outcomes for district SwDs require a reassessment of how district office staff is organized to collaborate and leverage their collective resources and a commitment to take actions needed for general and special educators to better enable SwDs to learn from their instruction.

a. Personnel Alignment

Supplement Recommendation 2a and subsequent personnel alignment actions unify administrative oversight for special education and Section 504, and for district office personnel who provide social-emotional wellness and physical and behavior support.

- ***Specialized Support.*** Establish a new structure (*Specialized Support* for descriptive purposes) with leadership reporting to the senior academic officer (SAO). Have two entities report to the *Specialized Support* leader: one for special education and a second for *Supportive Learning Services* (for descriptive purposes). Under the leader for *Supportive Learning Services* house a) equity and culture personnel and b) student support services personnel who meet IDEA related services criteria and are involved with special education and 504 evaluations and enable them to support students regardless of disability status. Include in this unit current special education personnel (such as psychologists), equity and culture personnel knowledgeable about SEL, and student support services personnel, such as social workers, nurses, and individuals with mental health expertise.) (Elements of this recommendation first appeared in Section II. Recommendation 2a.)

Consider the structure below.

Exhibit 4f. Suggested Specialized Support Organization

Specialized Support (reporting to Senior Academic Officer)	
Special Education Executive Director	Supportive Learning Leader
See current organization and Section V. Exhibit 5g that recommends an organizational adjustment.	Suggested reporting areas: psychologists (currently reporting to special education), social workers, mental health services, school counseling, and equity and culture.

- **Related Services Personnel.** Authorize student support services personnel who meet the IDEA definition of related services, e.g., social workers, mental health providers, nurses, etc., to support students with and without disabilities. Use the blending and braiding model to address any funding source limitations.

b. Data Review

Using the Recommendation 2a process, set, and supplement data review contents with the

following areas and exhibits (and other relevant information) to prompt discussions of possible root causes and actions for improvement.

- **2023-24 Fall and Spring Screening Rates.** Analyze proficient or above rates that decreased from Fall to Spring and disaggregate these data for students with and without IEPs. (See Exhibit 4a.)
- **SwDs by Specialized Programs.** Review rates (Exhibit 4b) and number of specialized program classrooms by number of schools (Exhibit 4c) to identify those with no or few program classrooms and those with high numbers.
- **Riverbend and Harrison Educational Centers.** See Exhibit 4d for various demographic data. Consider schools with high referrals to these centers to inform action planning.

Review data showing high OSS risk ratios for Black students without IEPs of one or more days (3.73) and over 10 days (15.02), and for American Indian students with one or more OSS days (4.25). In addition, review risk ratios for Black students without IEPs showing a 3.19 risk ratio for ISSs of 10 days or less. (See Exhibit 3t.) Note: high OSS and ISS risk ratios for students without IEPs often contribute to their consideration for special education.

c. Implementation Plan

Supplement the implementation plan addressed in Recommendation 1c with the following areas to improve SwDs' receipt of instructional, behavioral, and social-emotional supports and accelerate their learning. Have the plan ready for the beginning of the 2025-26 school year with implementation dates that are aggressive yet realistic.

Using committees focus on various areas to planning for the following –

- **Inclusive Early Childhood Expansion.** As part of the district's upcoming budget process, discuss how to increase early childhood programs by using available school space. This would enable all (or at least more) SwDs to receive (as appropriate) inclusive education and provide the same for children special education qualified during the school year. Also, an expansion would avoid use of home services when neither necessary nor preferred by parents. Explore any useful braided (proportionate) funding for this purpose.
- **Child, Family, and Personnel-Friendly Environment for Evaluations**. Visit the Wilder Complex to speak with personnel working in the young child evaluation center and observe family-friendly factors. Based on the results, consider other venues for this important first introduction of young children and their family to MPS.
- **Instructional Materials for Young Children**. Assess instructional materials currently available for young children with and without disabilities to ensure they are evidence-based, and benefits of using the same type available in kindergarten to improve familiarity and transition.
- **Placement Center**. Review enrollment forms and streamline them to eliminate

any redundant information. Have the placement center collect all necessary information and forward it to schools. Consider other school district practices with students enrolling at their local school. See for example the Chicago Public Schools' process. (Note: we could not find information about the placement center on the MPS website for new student enrollment during the school year. If posted, make the site easier to find; if not posted do so.)

- **School Enrollment without Proper Evaluation and IEP Documentation.** Quickly, through discussions with placement center staff and/or a time span audit to address any enrollment delays. In particular, consider enrollees with obvious or reported needs but who lack appropriate documentation. Consider, any enrollment delays due to, e.g., receipt of evaluation or IEP documents from other school districts. If the review finds incidents of delayed enrollment, expedite notification to all relevant personnel that with enrollment criteria met all students regardless of their disability status have the immediate right to attend school. [See Special Education Placement Policy 5741 (SEPP)]. Establish guidance to accommodate students in this category to support them to the extent appropriate until the receipt of required documents or completion of new evaluations or IEPs. Also, have assistive technology supporting physical mobility, e.g., wheelchairs, etc., to be readily available for enrollees with obvious or documented need.
- **Literacy Plan.** Include in the 2024-25 Literacy Plan for the 2025-26 school year figures missing for students screened and meeting Dyslexia criteria. Also, disaggregate screening data for students with and without IEPs to inform planning.
- **SwDs Receiving Most Instruction in General Education Classrooms.** For all documents that inform instruction, embed district supported supplemental SDI materials and strategies. Also, reinforce how general education supplemental tiered instruction can be reinforced with supplemental SDI, including more time on task and smaller group sizes.
- **UFLI.** Determine why UFLI has not been available for SwDs and develop a plan for its expansion to SwDs who would benefit.
- **Special Education Standards of Effective Instruction (SOEI) Aligned Tool.** Plan for a multidisciplinary group to review this tool to assess its usefulness for SDI instruction for SwDs educated in general education most of the time, in specialized programs, and in special schools. As part of this process, assess the extent to which Human Resources' instructional specialists conducting SOEIs are sufficiently knowledgeable about evidence-based SDI associated with SwDs needs.
- **Specialized Programs.** Change names of the EBD, ASD, and DCD programs with other neutral terms that avoid a disability label and the appearance of placement based on that factor. Obtain representative parent and student feedback to

consider various choices. Also, based on the data review showing schools with no program classrooms. For those having large numbers (See Exhibit 4c) discuss school impacts and more equitable classroom distribution. Also, review and address any transfers needed for SwDs with the same ages as other students attending the school because age-appropriate program classrooms are not available.

- **Unique Inclusive Models for Students in Specialized Programs.** Consider approving and expanding instructional models that increase inclusive instruction by using specialized program classroom staffing formulas to fund co-teaching and other support models for SwDs to receive general education classroom instruction.
- **Specialized Program Placement Procedures.** Streamline documentation needed to support placements to Level III and Level IV settings, and have observation conducted by an individual with expertise in areas related to the student under consideration. Especially for movement to a Level IV setting, if instructional and behavior changes are recommended to improve current provisions have a knowledgeable individual model and support the changes for a reasonable period of time to ascertain their effectiveness. If effective, act to maintain that support (by others if needed) for the student to succeed and avoid a more restrictive placement.
- **Special School Support.** Expedite ways the Black student achievement office (and student group offices as appropriate) include River Bend and Harrison in their activities. Also, expedite walkthroughs by respective associate superintendents and cross section of district office staff members, and have them listen to students, families, and personnel about suggestions for improved teaching and learning.
- **Metro Ed Services.** Consider ways educational services can be expanded to include high school students.
- **Positive Behavior Support.** Identify various ways to message the responsibilities of the broad range of personnel necessary to reduce disproportionate OSSs and ISSs for students with and without IEPs. Message widely that disparities cannot be resolved by special education department personnel and special educators alone. Identify additional data sorts to better identify schools and grades by associate superintendent portfolios requiring support and actions to be taken. Also, have the MTSS director facilitate representatives of all district office groups and representative school personnel with a high level of expertise in this area review the special education department's Recommendations for the Intervention Best Practices Guide to suggest improvements and recommend those to embed in MTSS implementation guidance.
- **Secondary Transition Activities and Services.** Plan for expanded programming

that does not require students with more severe/profound disabilities to receive a waiver for day programs. See, e.g., Work-Based Learning for Students with High Support Needs.

- **SEAC Meeting Participation and Parent Concerns.** Have *Specialized Support* leadership meet with representatives from MPS's community and family ombudsmen, Family Resource Center, student group offices, and city nonprofit organizations supporting families of SwDs (including PACER, the MPS Academics Advocacy Group, etc.) to consider ways to increase SEAC participation by parents and families of children with disabilities and prioritizing stakeholder identified training areas. In addition, have a process in place during such meetings to address concerns, such as those listed in Council SST report.
- **EduClimber.** See Recommendation 1h. Data Analysis and Reports regarding an implementation team to improve training and support for EduClimber and other data and progress platforms.

Have the Implementation Plan Include actions necessary to carry out those referenced in Recommendation 2d-h below. Establish a template for associate superintendent and school leadership teams to plan work needed to carry out these actions. Have the associate superintendent teams work with their portfolio schools to support plan development. Embed and align activities within current and future planning documents.

d. Written Guidance and Information

Using Recommendation 1d's process, supplement written guidance and information for the areas below and embed it in the *Specialized Support* manual –

- **EC Programs.** On MPS's website post options for 3- to 5-year-old children with and without disabilities. Specify for general education programs information about how these options apply to and support children with disabilities. Cross reference all regular and special education websites to maximize access to this information. For the High Five program, clarify the "educational team" to specify that an IEP team would consider the continued enrollment of a child with special education qualification subsequent to enrollment.
- **SwD Instructional Materials.** Clearly identify SDI literacy and math programs for SwDs. To the greatest extent for SwDs taking or likely to take MCA assessments identify general education core instructional materials also. For more intensive needs, reduce group sizes and increase daily instructional time. Expect special educators to receive instructional materials at the same time that general educators receive them.
- **Special Education Placement Practices.** Include time frames for program director review to ensure it does not lead to unreasonable delays. Differentiate protocol for students recommended Level III and Level IV placement. and monitor them to ensure

- **Special Classroom Programs.** For each specialized classroom program, describe student characteristics, decision-making criteria, program parameters (such as staffing ratios), curricular materials, equipment and supplies, etc. If currently not available, establish districtwide high-quality indicators for each program, including the School Based program.
- **ELwD Students.** Describe instructional models for students with IEPs who need English language acquisition instruction when educated most of the time in general education classes and in specialized programs that account for their disability related needs. (See the U.S. Department of Education's English Learner Toolkit at Section 6. Tools and Resources for Addressing English Learners with Disabilities.
- **Publicly Available Information.** To the maximum extent, post all information on the district's website, including linked documents (that are not sensitive or confidential). This investment would promote transparency and provide the public increased access to desired information.

e. Map Material and Human Resources, Analyze, and Fill Gaps.

Supplement Recommendation 1e and subsequent actions with the additional areas identified below for resource analysis –

- **Specialized Classrooms** with students requiring significant support for AT use and personnel available to provide this support.
- **Behavior Specialists** needed to perform expected activities based on the number of students supported and full time equivalent (FTE) currently available.
- **Personnel Educating ELwD Students** with knowledge about both EL support and disability associated instructional, behavior, or social-emotional needs of their students.
- **Assistive Technology Support** and any need to expand volunteers with paid staff.
- **Work Internships, Community Based Training, and Work Opportunities** available to accommodate all SwDs with participation interest, including those participating in alternative statewide assessments.

(See Recommendation 6 for *Specialized Support* personnel recruitment and retention.)

f. Differentiated Professional Development

Supplement Recommendation 1f and subsequent PD with the following areas (and others as needed) to carry out this recommendation–

- **Master PD Plan.** Plan for ways to ensure all personnel receive the PD they need to carry out high quality instruction and related services for their students. See, for example, Broward County Public Schools' Master Plan for Elementary Learning and Professional Learning Handbook. [Note: Dr. Nicole Mancini (CGCS's chief academic officer) led the Master Plan's writing. She is available to brief district

staff members on the document and the district's implementation process.] In addition, address ways special education department personnel can plan and present PD with other knowledgeable district office personnel, e.g., including representatives on the department's PD planning committee.

- **Special Education Department PD Planning Document.** Update the 2023-24 school year document and organize the contents to facilitate stakeholders' easy identification of courses of interest.
- **Core Instruction for SwDs.** Embed in all general education training information for educators to improve their core instruction for SwDs, including the accommodations they need to learn. Also, reinforce that universal design for learning (UDL) principles support teaching and learning for all students.
- **Offices Supporting Specific Student Groups.** Collaborate with personnel in these offices to develop and provide PD relevant to the SwD groups associated with their jurisdictions to increase their knowledge relevant to these recommendations. Include substantive information that transcends procedures.
- **Rollout of Instructional Material PD.** Ensure special educators who teach SwDs participating in MCA assessments receive instructional materials and PD along with general educators. For both educator groups include in PD information about differentiated instruction and accommodations helpful for low achieving students and SwDs to benefit.
- **Differentiated Instruction.** Address general and special educator need for PD to address students in their classrooms having large achievement gaps.
- **Specialized Program Instructional Material PD.** Ensure special educators and SEAs supporting students in specialized program classes receive the training they need to effectively use their instructional materials.
- **Positive Behavioral Interventions and Supports:** Conduct intensive PD for general and special educators and SEAs on evidence-based behavior interventions to support consistent implementation. Partner with school psychologists, social workers, mental health providers, and SEL specialists to design and provide the PD. Update **Bolstered Asynchronous Training Offerings** to include proactive strategies to address students' challenging behavior.
- **SEA Training.** With SEA input further develop PD for students' academic achievement, positive behavior, and SEL. Differentiate PD for SEAs based on the SwDs they support.

g. Data Analysis and Reporting

Supplement Recommendation 1g and subsequent data analysis and reporting with the following to inform follow-up action –

- **General Education <40% of the time and Special Schools** by race/ethnicity and by gender.

- **OSS Risk Ratios for >10 days** with risk ratios higher than 2 to show all or groups of students by race/ethnicity, and by race/ethnicity and gender to proactively identify follow up action. Then disaggregate concerning data, e.g., by associate superintendent portfolios, by school, by grade, by service location, by program, etc.

h. Monitoring and Accountability

Follow the model described at Recommendation 1h and supplement actions under this heading to consider the following –

- **Core Instruction and Supplemental SDI.** Embed in walkthrough activities observations of core instruction to SwDs (and other low achieving students) and for evidence-based supplemental SDI most likely to support learning. Also, walkthrough specialized program classrooms and special schools, guided by high quality protocols.
- **Key Performance Indicators.** Have representative members of the MTSS Leadership Team consider relevant KPIs for areas related to SwD achievement, behavior, and social-emotional wellbeing. Include SPP Indicators and targets that MPS has not met and set higher targets for those exceeded. Also, include KPIs for –

  – **Maximum Risk ratios** for students with and without IEPs and by race/ethnicity for OSSs and ISSs (for 1 day or more and for more than 10 days).

  – **Movement of Students** to and from specialized programs and special schools.

  Describe supports that will be available to schools with students impacted by KPIs not met.

Section VII. Shared Accountability for Results at Recommendation 8 addresses ways the MPS Strategic Plan, Achievement and Integration Plan, and School improvement Plans can incorporate prioritized actions related to the education of SwDs.

V. Administrative and Operational Support for SwD Teaching and Learning

Under this section, the following three areas are addressed that are critical to improve teaching and learning for SwDs –

A. Interoffice Collaboration
B. Special Education Organization and Support to Schools
C. School-Based Support for SwDs
D. FTE Specialized Personnel, Comparative Ratios and Personnel Considerations

Interoffice Collaboration

As has been reiterated throughout this report, to effectively leverage resources for achievement and social-emotional wellbeing of all students, including those with disabilities, it is essential for all district office personnel supporting teaching and learning to collaborate and support school leadership and personnel effectively and efficiently. This section addresses MPS's organization

for academics and associated areas, and information about ways in which personnel work together for common purposes.

1. District Level Leadership Teams

Based on information provided by MPS, three leadership teams meet to collaborate and share information.

Senior Leadership Team (SLT)

According to the MPS website, the senior leadership team includes the superintendent and her direct reports (senior officers for academics, finance and human resources) and the superintendent's assistant. MPS superintendent meets twice weekly on Tuesday mornings for three hours and more informally on Thursday afternoons to prepare an agenda for the executive leadership team.

Executive Leadership Team (ELT)

This team, which meets monthly for 1.5 hours, includes direct reports to the seven senior officers. Participants share and monitor progress on MPS priorities, provide updates, and discuss key topics with district-wide impact. The team focuses on leadership development and department performance management processes.

District Instructional Leadership Team (ILT)

This team, which meets weekly, includes the deputy superintendent, associate superintendents, and senior academics officer, along with their executive directors. Discussions focus on principal PD to support their leadership, and information school personnel need to improve their students' outcomes.

Interviewee Feedback

A few areas were raised that reflect opportunities for improvement –

- Need for an individual with facilitator responsibility to lead data reviews, root cause analysis discussions, etc., and coordination of follow up actions. This team could function as the districtwide MTSS team.
- Associate superintendent meetings with principals have not embedded information about instructional strategies designed for SwDs (and EL students) to benefit from the literacy professional learning being presented.

2. Collaboration Across the District Office

The subject of interoffice collaboration received a considerable amount of discussion with interviewees. Overall, it appeared that individuals hired into district-office positions within the last several years are committed to their work and have a desire to create opportunities for principals and school personnel to enable their students, including those with disabilities, to excel. Interviewees appeared to have a general respect for the expertise and knowledge presented by district office department personnel.

One overarching interview theme was the need for district level personnel who support schools to improve their collaboration to leverage their respective resources for students having common needs. Specifically, SwDs (with school-based personnel) have instructional (and training needs) that permeate office and department boundaries, which are supported by equity, school climate, student support services, special education, EL, and offices supporting specific student groups (Black, Latine, and Indian). However, it does not appear that these groups have identified the most important SwD common needs to coordinate their support. This theme is supported by the following interviewee feedback --

- In particular, separate reporting lines for special education and student support services (with personnel IDEA specifies as providing special education evaluation and related services to SwDs) make collaboration more difficult. For example, individuals representing student support services areas are not invited to special education department meetings that would address issues relevant across departments.
- Generally, current practices are siloed and too segregated. The lack of cross-department work stalls implementation. Organizational barriers interfere with the work, which becomes harder than it needs to be.
- Thwarted collaboration attempts have resulted in a “stay in your own lane” mentality.
- Personnel funding sources interfere with collaboration; the braided (or proportionate) funding model has not been used. One notable example is how funding has limited the involvement of Black student achievement personnel at MPS’s two special schools (Harrison and River Bend), which enroll a disproportionately high Black SwD population.
- District office information does not consistently reach school personnel. Information is inconsistently understood, interpreted, and implemented. Communication overall is problematic.
- Various departments, including special education, equity, school climate, Indian education, Black student achievement, etc., have personnel who support a set of schools. Even though their support includes SwDs and their teachers and support staff, these teams do not interact with each other to share information and consider how they might work together to improve teaching and learning.
- Bureaucratic reporting interferes with cross department and office collaborations when individuals lack formal and informal authority to by-pass one or two levels of supervision.

It is also noteworthy that the special education department funded various positions to focus on the overidentification of American Indian and of Black male students qualified in the area of emotional behavioral disorder (EBD). Also, the department developed pre-meeting guidance for Indian Education department personnel to use for parents of SwDs to understand the purpose manifestation determination meetings. However, there is a desire for more intentional and consistent interactions between these offices, and other student group offices as well, to discuss how their respective staffs can better coordinate their support for SwDs.

3. MPS Organization for Academics and Student Support Services

Exhibit 5a. Academics and Student Support Services Organizations shows relevant components of these two departments. Most notable is the separation of student support services from academics, and separation of school social work, mental health, health services, and counseling with personnel inclusive of IDEA defined providers of related services for SwDs. Only the social work group was listed on the special education webpage. In the past, the special education department included the areas of nursing, social work, mental health, and counseling. Interviewed individuals who experienced this combined structure were unaware of the reason for dividing these functions.

Exhibit 5a. Academics and Student Support Services Organizations

Academics	Student Support Services
Academics	School Social Work Services
Special Education	Mental Health Services
Early Childhood Education	Health Services
Black Student Achievement	School Counseling
Indian Education	
Latine Student Achievement	
Multilingual and Magnet Programming	

Special Education Department Organization and Support to Schools

This section provides information about the special education department's current organizational structure and summarizes various ways department personnel support schools.

1. Special Education Department Organization

Five directors report to the department's executive director along with an individual overseeing administrative, data, and financial support. The directors manage the following –

- **School and Program Support.** Three directors supervise two or three district program facilitators (DPFs) who each support 19 to 26 schools. Another director (with three DPFs) supports 12 sites. In addition, the directors manage 25 districtwide programs that are distributed among them, such as extended school year, two specialized programs (deaf/hard of hearing and blind/vision), PD, third party billing, homebound services, etc. It is notable that each of these directors and their DPFs have schools aligned with each associate superintendent, which is a preferred model of organization. One of these directors also supervises four managers, each having responsibility for psychology, psychologists, speech/language interpreters, or OT/PT.

  Special Education Organization. The combination of school and districtwide program development and support requires a difficult balancing of time to devote adequate attention to both. The special education department's website does not publish a list of these districtwide programs with associated positions for oversight responsibilities, making it difficult for both other department personnel and DPRs, associate superintendents, school-

based personnel, and stakeholders to request assistance when otherwise unable to receive assistance.

- **Young Children.** One director manages early childhood special education with the support of three DPFs. This group manages evaluations for young children and supports 10 schools.
- **Monitoring and Compliance.** With the assistance of two DPFs, 10 DPOSs, an out of district liaison, and a community and residential staff person, this unit is similar to those of other school districts with which we have experience.

2. Special Education Inter-Department Activities and Communication with Schools

Based on written information MPS shared, the special education department has initiated collaborative activities to review data for academic outcomes, initial evaluation results, eligibility, attendance, suspension, etc. Staff have provided PD to other department personnel to address over identification of American Indian and students of color receiving special education services, and to understand special education processes. Also, the New SpEd Leadership Initiatives document described the following activities designed to improve internal collaboration, inter-department communication, and communication with schools.

- An excellent biweekly department newsletter sent to all department staff has a goal of uplifting department morale.
- The sunshine committee has rebooted and sponsored a Winter luncheon celebration with all department staff.
- Weekly student placement team meetings are held to discuss upcoming placements, new arrivals, etc.
- A DPF Update is sent biweekly to the special education listserv.
- Monthly, a meeting is held with all department personnel, which is planned by using a google doc.
- Quarterly SPED Data meetings are held with building administrators to review data for academics, IEP, behavior, and attendance data. For example, see 2024-25 SPED data for the Lucy Laney School.
- School-based administrators, ESPs, clerical, teachers, etc., may request support from the special education department personnel through an automated SPED Support Request Form. This form, however, does not appear on the special education webpage and is password protected.

3. Interviewee Feedback

Interviewees shared the following feedback about interactions with special education department personnel.

- **Staff Turnover.** Frequent personnel turnover diminishes current institutional and

professional knowledge, which impacts the consistency of districtwide and school-based practices.

- **Open Discussion of Challenges.** Special education leadership does not freely discuss with district personnel outside the department various barriers and challenges that could drive improvements. Rather, discussions focus on appropriate processes that are in place. Too often good ideas stop at the department leadership level.
- **Inconsistent Information.** The communication of information from department staff to schools too often depends on director oversight or a referral to the monitoring and compliance unit. Inconsistent information makes it more difficult for stakeholders to carry out expectations, which have contributed to frustration at multiple level, frequent personnel turnovers, and inconsistent practices.
- **Principal Supervisor Meetings.** Associate superintendents regularly meet with special education DPFs to discuss schools needing more support, etc. Color-coded data (green/yellow/red) describes the level of needs. However, there is a need for various way to support schools, rather than just spending more time at them. DPFs typically do not attend associate superintendents' principal meetings because information has not addressed SwDs. There is a desire to embed such information in these meeting discussions.
- **DPF School Support.** Their activities include meeting with upset parents, modeling instruction, helping to develop behavior intervention plans, conducting fidelity check, etc. Expectations for their work varies based on each supervising associated director. There is desire for DPFs to have a consistent description of their roles and deliverables to avoid inconsistent expectations. Current written job responsibilities are very broad. Also, there is desire for DPFs to receive written information about districtwide guidance to avoid inconsistent oral directives across directors.
- **Districtwide Programmatic Support.** Support for deaf and hard of hearing and blind and vision areas are listed as 2 of the 25 districtwide support areas listed under the three directors who support schools and programs. However, many important areas of expertise needed for districtwide support are missing, such as for supplementary SDI for literacy and math, challenging behavior, and each specialized program to develop high quality indicators to support instruction and walkthrough look fors.
- **DPF PD.** Some new DPFs transitioned from a special education teacher role. Their training has depended on each supervising director.
- **DPFs Workload.** This has increased with DPFs' need to support the many new alternate certified special educators. For example, some need to learn how to write IEPs and use the district's electronic IEP system (EdPlan). Special educators hired from other school districts also need training to navigate EdPlan's customized MPS process. Also, support is needed to clarify inconsistent information between EdPlan instructions and the special education due process guide.

- **Personnel Evaluation.** There is a lack of awareness of the personnel evaluation process for department staff.
- **Department Related Service Providers.** These staff members were viewed as being responsive to schools and families. They collaborate and support each other, back each other up, step up when needed, and are cognizant of the need to support themselves and each other.

School-Based Special Support for SwDs

The information in this section compares full time equivalent (FTE) data MPS shared for each of the personnel areas addressed below. Staff ratios comparing these figures and total SwD enrollment are compared with other school districts for which we have information. Also, the material includes MPS written information and interviewee feedback

1. FTE Specialized Personnel and Comparative Ratios

This section presents FTE data for personnel areas that school districts typically use to support SwDs: special educators, special education assistants (SEAs), social workers (SWs), speech and language pathologists (SLPs), nurses, psychologists, occupational therapists (OTs), and physical therapists (PTs).

FTE Personnel Over Five School Years

Data in Exhibit 5b. FTE Figures by Personnel Areas (2020-24) show increased FTE figures for special educators (+72.6) and OTs (+5.3). FTE decreases applied to all types of SEAs (-56.8), social workers (-17.1), SLPs (-8.6), and nurses (-7.1). Very small decreases applied to psychologists (-0.6) and PTs (-0.1). Over the past three years, data from the Minneapolis Department of Education reports that special education enrollment in the district has increased (5,065 in 2023; 5,428 in 2024; and 5,574 in 2025). Moreover, MPS personnel ratios are larger than most district averages, particularly for psychologists, special educators, speech and language pathologists, and OTs. (See Appendix A. Percent SwDs and FTE Staff to SwD Ratios in Ascending Order by Group.) **Note, these figures must be interpreted with caution due to differences in district reporting methods; they are not intended to prompt action without significant additional review. Enrollment changes for specific special education needs may vary resulting in changing needs across departments.**

Exhibit 5b. FTE Figures by Personnel Areas (2020-24)

	2020	2021	2022	2023	2024	2024:2020
Special Educators	529.9	456.7	503.1	513.3	602.5	72.6
SEAs	**546.3**	**525.5**	**473.8**	**471.1**	**489.5**	**-56.8**
Social Workers	124.1	122.1	105.5	108.4	107	-17.1
Speech Language Pathologists	**98.9**	**97.4**	**90.3**	**90.8**	**90.3**	**-8.6**
Nurses	53.6	55.3	51.4	47.4	46.5	-7.1
Psychologists	**41.3**	**40.9**	**38.5**	**39.3**	**40.7**	**-0.6**
Occupational Therapists	32.4	31.9	31.1	35.2	37.7	5.3

	2020	2021	2022	2023	2024	2024:2020
Physical Therapists	12.1	12.1	12.5	12.5	12	-0.1

Comparison of District Personnel Ratios Caveat

Council SST reports associated with special education include a section with school district comparative staffing ratios for each of seven major personnel areas based on numbers of students with IEPs. These ratios by area are compared for the reviewed school district to other urban school districts on which the SST has data.[6] As discussed below, these figures included vacant positions. No contractual services FTE figures were provided.

CGCS's SST calculated ratios for each of the seven personnel areas based on the district's reported 31,488 SwDs. For example, with 602.5 FTE special educators for all SwDs there was one educator for an average number of 9.8 SwDs. This SwD based analysis has allowed for a large set of 82 district data set submissions. A more precise analysis would make this collection and analysis more difficult.

As indicated, these comparative ratios are not precise, so results need to be used with caution and *should not be relied upon to make personnel decisions*. Rather, they should be used to investigate the extent to which personnel in areas outside the norm are being used effectively and how they are meeting student needs. In addition, district data may not be consistently reported and are sometimes affected by a greater reliance on different placement types, e.g., resource vs self-contained or out-of-district. Also, district reporting may be based on all SwDs, including those placed in charters, agencies, and nonpublic schools, while other districts do not count them. Still, these data are the best available and are useful as a rough guide to considering a district's staffing ratios. (See Appendix A. Percent SwDs and FTE Staff to SwD Ratios in Ascending Order by Group.)

MPS FTE Figures and Comparative Staffing Ratios

Exhibit 5c shows for each of the seven personnel areas the number of FTE positions and the difference between MPS and surveyed district average ratios. MPS average FTE ratios were **larger than all district averages** in every personnel area: special educators (by 4.4 FTEs), SEAs (by 2.8), SLPs (by 57 FTE), psychologists (by 111 FTEs), social workers (by 109), nurses (by 11), OTs (by 228), and PTs (by 507). Note: MPS uniquely evaluates and serves very young children (birth through two years). Figures for this group of students are not included in this analysis and may have a small influence on the ratio results.

Exhibit 5c. Comparative MPS Non-Charter School Personnel FTEs and Ratios

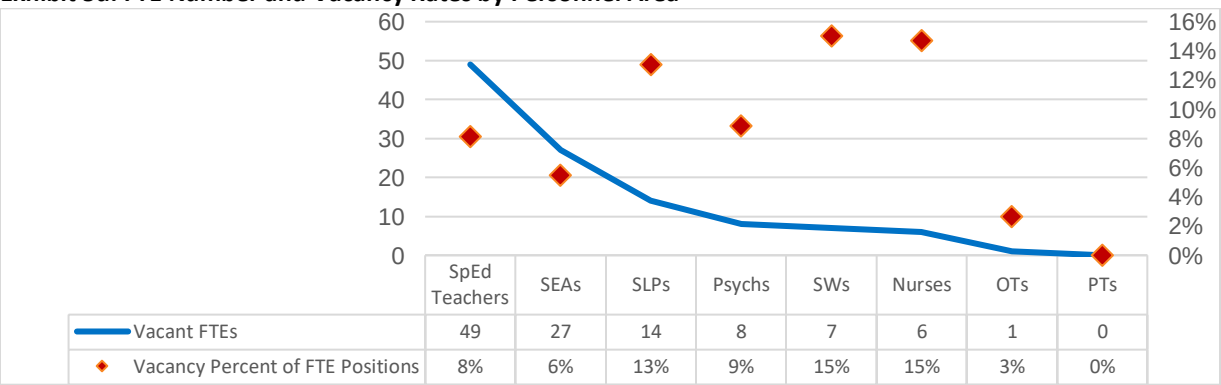
[6] The data were provided by the school districts that responded to a survey conducted by the Urban Collaborative (for special education), CGCS teams, or members of the team through other district review work. Although the data was collected over a period of time, typically ratios do not change significantly from year to year.

	MPS FTE Figures	MPS Students to Personnel Ratio	All District Ratios	MPS Difference
Special Educators	602.5	**9.8**	**14.2**	**4.4**
SEAs	489.5	**12**	**14.8**	**2.8**
SLPs	90.3	**55**	**112**	**57**
Psychologists	46.5	**65**	**176**	**111**
Social Workers	40.5	**127**	**236**	**109**
Nurses	40.7	**145**	**156**	**11**
OTs	30.7	**156**	**384**	**228**
PTs	12	**490**	**997**	**507**

Vacant Special Education Related Positions

Figures in Exhibit 5d. FTE Number and Vacancy Rates by Personnel Area show highest vacancy rates for social workers (7; 15%), nurses (6; 15%), and SLPs (14; 13%). Vacancy rates are below 10 percent for the 49 FTE special education positions (8%), 27 FTE SEA positions (6%), and 8 psychologist positions (9%). There is only one FTE OT vacancy and none for PT. **Special educator and SEA vacancy rates are lower than we have seen for other school districts with which we are aware.**

Exhibit 5d. FTE Number and Vacancy Rates by Personnel Area



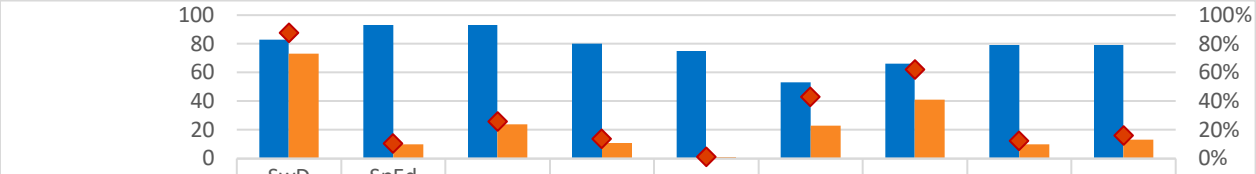
	SpEd Teachers	SEAs	SLPs	Psychs	SWs	Nurses	OTs	PTs
Vacant FTEs	49	27	14	8	7	6	1	0
Vacancy Percent of FTE Positions	8%	6%	13%	9%	15%	15%	3%	0%

Number and Percentage of Surveyed Districts with SwD Rates and Staff Ratios Smaller than MPS's

Data in Exhibit 5e show the number of district survey responses with smaller SwD to staff ratios compared to MPS. These figures show the following.

- **SwD Rate.** 88 percent of the districts (73 of 83) had a SwD ratio smaller than MPS's.
- **<27% of District Ratios Smaller than MPS.** Five areas had less than 25% of districts with smaller FTE ratios than MPS: psychologists (1 of 75; 1%), special educators (10 of 93; 11%), OTs (10 or 79; 13%), SLPs (11 of 80; 14%), PTs (13 of 79; 16%), and SEAs (24 of 93; 26%).
- **MPS Ratio Close to Average.** MPS ratios in two areas were about average compared to all other districts: social workers (23 of 53; 43% with lower rates) and nurses (41 of 66; 62% had lower rates).

Exhibit 5e. Number of District Survey Respondents & Number and Percentage with Ratios Smaller than MPS



	SwD Percent	SpEd Teachers	SEAs	SLPs	Psychs	SWs	Nurses	OTs	PTs
# Districts	83	93	93	80	75	53	66	79	79
# w/Ratios< MPS	73	10	24	11	1	23	41	10	13
% w/Ratios <MPS	88%	11%	26%	14%	1%	43%	62%	13%	16%

2. Written Information about School-Based Personnel Supporting SwDs

MPS provided the following written information relevant to the above personnel areas.

Due Process and Site-based Special Education Team Member Roles

A special education department Due Process Accountability Document (December 6, 2018) describes roles for principals, case and IEP managers, site special education lead or coordinator (assigned by site principal), special educator or related service provider, school social worker, school psychologist, general education teacher, licensed school nurse, SEA, itinerant teacher. It also describes site responsibilities for special education team members. In pertinent part –

- **Principals.** Provide oversight and supervision of the building's special education department, including due process procedures. (Most notable is the document's sole references to procedural compliance, e.g., "If needed, consider disciplining staff members whose due process paperwork is routinely late or a poor quality." There is no reference to any expectations related to instruction. The same is true for other special education team members.)
- **Site Special Education Lead or Coordinator.** Assigned by principal, this position addresses special education due process procedural matters and "maintains oversight and/or awareness of the special education services within the building, including the procedures and practices which address the requirements of special education due process." (Note: the role does not include reference to SDI and related services delivery per IEP requirements.)
- **Social Workers.** Serve as a resource for special education due process. They provide *direct or indirect services pursuant to students' IEPs*; and support functional behavior assessments (FBAs). (Emphasis added. Note: the provision of services role contrasts with that shared by interviewees. Also, the document does not reference to the social worker role in conducting special education evaluations and participating in meetings to determine eligibility.)

interviewees commented about differences between this document's content, expectations, and implementation practice. The special education lead depends on who volunteers for the role and case management responsibilities are not consistent across schools.)

Draft Onboarding Process for New Special Education Personnel

The special education department worked with the Design and Training team to build a support and collaboration onboarding plan. An advisory committee with department representatives determined the scope of PD work and prioritized new projects. The document provides a template for 10 days of onboarding activities and includes space for new staff to recommend improvements.

Caseloads

Minnesota Rule 3525.2340 requires school districts and school boards to establish a policy for determining caseloads. MPS's policy establishes factors for determining caseload: direct student contact minutes, evaluation and re-evaluation time, indirect service minutes, IEP management, travel time between sites, and pother services as required by IEP. The current union contract requires special education resource teachers (SERTs) to be staffed at a ratio of 1:20 with a maximum of 1:23. If this ratio is exceeded, an MFT MOA requires SERTs to receive an additional 55 minutes per day of due process time. Caseloads for specialized programs follow: school based program (8 to 12 students with 1 special educator, 2 SEAs, and .2 FTE social worker); specialized ASC, DCD, Class/Life Skills (8 to 10 students, 1 special educator, and 2 SEAs); and EBD specialized (only "small group settings" was specified). No caseload information was shared related to schools educating only SwDs.

Workloads

A Memorandum of Agreement (MOA) between MPS and the Minneapolis Federation of Teachers (MFT) addresses special education workload, which relates to all responsibilities required of special educators based on student needs, including SDI, (re)evaluations, due process procedures and IEP management responsibilities, preparation time, directing paraprofessional work, and other assignments. The MOA also recognizes staffing shortages resulting in an increasing number of educators working on Tier I or Tier II licenses and their associated need for mentoring and coaching. The results of a 3-year time study of workload, caseload, and paperwork time had a December 2024 timeframe for submission to the Special Education-Labor Management Committee (SELM) to support a jointly constructed workload formula to be piloted and operationalized for the 2026-27 school year. (Note: we received MPS's 104-page Time Study Report on February 24, 2025.)

During the interim, the MOA called for MPS to communicate to all administrators the expectation that special educators are permitted to allocate time within their schedules (outside their designated preparation time) to complete due process requirements and create a special education coaching model for special educators working under a Tier I or Tier II license for prioritized coaching support.

MPS Academy (Grow Your Own SPED Teacher Licensure Pathway)

The first cohort began in June 2024. According to the MPS website, the program received funding from the Minneapolis Foundation and is the first school district in the state with the ability to recommend teacher candidates for special education licensure upon completion of the program.

In addition, MPS sponsors a residency program with St. Thomas University and a Teacher Apprenticeship program that results in a master's degree and Tier III special education license.

SEA-Related Activities

SERIS assist special education resource classroom teachers and two specialized program SEAs typically assist associated special educators. Some assistant educators (AE's) support Transition Plus programs for students with behavior issues. School Success Program Assistants (SSPA) support scheduling, onboarding, coaching, and check-ins with the cadre team members. Two days of online training takes place at the Davis Center. SEAs on a CADRE team support substitutes for SEAs absent due to sick and/or paid leave. CADRE team members are permanent employees who work daily and are fully eligible for benefits. (Note: for this report the term SEA was used to describe special education assistant related positions.)

3. Interviewee Feedback

Overall, interviewees reflected a sense that school-based personnel were receiving special education department support. There was a perspective that special education was "running better," reflecting the lower special education teacher vacancies.

Special Education Teachers

The following comments pertained to special educators –

- Teachers are not consistently receiving time to complete their due process requirements, which are overwhelming. This issue is partly due to schedules that do not first consider special educators. This impacts their time available to develop meaningful lessons for students.
- Caseloads that began at 18 students have increased to 25 students.
- In spite of the relatively low FTE vacancies for special educators, one school reported an extreme staffing crisis, exacerbated by poor special educator attendance rates. In some cases, district office staff have been deployed to cover classes.
- There is great need for more PD, including front-end PD for new special educators and those working under alternative licensures.

Special Education Assistants

The following comments pertained to SEAs–

- There is a perception that individual SEAs for a student are not allowed, regardless of a student's extreme behavior and need for supervision. (Note: an Additional Adult Assistant Request form, previously addressed, is available to document this need.)
- Instead of contracting out this PD, MPS is conducting its own crisis prevention training for SEAs; however, there has been no discussion about deescalating behavior or alternative methods for restraining students.
- Compared to the past, SEAs are spread thinner and not as qualified, resulting in a higher need for support.

Social Workers

Generally, each school has a full-time social worker assigned. They typically facilitate school-based special education operations and function like an assistant principal, performing the administrator designee function at IEP meetings. They may also have hallway duty, act as the section 504 case manager, support homeless and highly mobile students, convene social skills groups, and attendance activities. However, their roles vary by school.

- Although some social workers collaborate with special educators and students, these typically are not described in IEPs.
- Social workers are the first on call to support a teacher and/or student in crisis.
- Some support personnel in their school. Although the Employee Assistance Program (EAP) offers programs to support staff, many prefer talking to someone they know.

Speech and Language Pathologists

Interviewee feedback included the following –

- SLPs support students and special educators in various ways, e.g., record communicative functioning progress; focus on phonological awareness and comprehension, etc.
- As students in middle school begin to exit from speech and language services, SLPs focus on providing indirect services by collaborating with special educators for, e.g., supporting modification and adaption of science and social studies instruction and assignments, etc. (Note: This model is typical of school districts with which we have experience.)
- Paperwork concerns involved the large number of initial speech and language evaluations, which requires about two hours of paperwork each and weekend work.

Occupational Therapists and Physical Therapists

The following interviewee comments concerned OT and PT –

- The Lead OT has a monthly staff meeting and virtual office hours twice weekly.
- There is a desire, but it has been difficult to establish collaborative models.
- There is a need to include travel times when considering OT and PT caseloads.
- Monthly, OTs and PTs meet to receive PD and discuss pressing issues. Reportedly, personnel support each other when one has a large number of evaluations to complete. Also, they consider mentoring to be well done.

Additional Issues

Below are issues related services staff shared that overlap service areas. These concerned the following –

- There is need for caseloads/workloads to include staff persons' ability to participate in the MTSS process, and to implement it with fidelity. This issue adversely impacts the expected use of the SRBI process to evaluate a student's qualification for SLD.

- Use of a staffing agency to contract with nurses and social workers requires a higher hourly rate. In some circumstances retired personnel have been used to address shortage areas.
- Redundant paperwork and the need to improve the migration of data from one electronic platform to another was a recurring theme.

Recommendation 5. Increase collaboration across district departments and offices to maximize use of collective resources.

MPS would benefit from an organizational structure that brings cohesion across the system to ensure collaboration and consistent messaging. Consider the following stricture for this purpose.

a. Personnel Alignment

Make several organizational adjustments to optimize support for SwDs and all students to benefit from activities for positive behavior, physical and mental health, and social-emotional wellness. For clarity, the prior organizational suggestions are included below.

- **Broader Deputy Superintendent Role.** As previously mentioned in Section I. Recommendation 1a, have the deputy superintendent take on a broader oversight role with a direct report by the senior academic officer (SAO). Enable the SAO to continue having direct conversations with the superintendent (while keeping the deputy informed). Also, continue to include the SAO on the superintendent's executive leadership team. This recommendation is not intended to decrease SAO and superintendent contact or reduce the SAO's contribution to the team. Rather, it is to have a single reporting line for all personnel areas supporting teaching and learning.
- **New MTSS Leadership Position.** Also, as previously mentioned in Section I. Recommendation 1a, have the MTSS director (designated for informational purposes.) This structure would enable the MTSS director reach (through the deputy) all entities with responsibility for activities relating to the MTSS framework.
- **Unify Leadership for Special Education and Support Services for All Students.** See Exhibit 4g. Suggested Specialized Organization, which is repeated here for convenience.

Exhibit 4f. Suggested Specialized Support Organization

Specialized Support (reporting to Senior Academic Officer)	
Special Education Executive Director	Supportive Learning Executive Director
See Exhibit 5g below.	Consider the reports: psychologists, social workers, mental health services, school counseling, and equity and culture

- **Restructured Special Education Department.** Consider the organizational structure below to better align the special education directors with either school or districtwide program responsibilities. In our experience, this structure enables such directors to focus their attention on school-based needs or on districtwide needs. The current organization combines these functions, making such foci difficult.

For districtwide support, consider having individuals assigned to this division who have high levels of expertise in math and literacy SDI, ELwDs, and others with expertise to support one or more specialized program. Using a tiered support structure, these individuals would research evidence-based practices, attend conferences, develop high quality instructional indicators and PD, and act as a Tier III resource to school-support directors (Tier II) and DPFs (Tier I) when they need assistance to address issues beyond their immediate knowledge.

Exhibit 5g. Suggested Special Education Department Organization

Special Education Executive Director			
	Associate Superintendent	Associate Superintendent	Associate Superintendent
New Districtwide Programs and Services Director	Special Education Director	Special Education Director	Special Education Director
Managers and Districtwide Support Areas	DPFs by Schools	DPFs by Schools	DPFs by Schools
Experts to support literacy and math SDI, positive behavior support, ELwD, each specialized program model, etc.			

b. Implementation Plan

Supplement the Implementation Plan referenced in Recommendation 1c with the following –

- **Personnel Alignment.** Consider the structures suggested above and ways to introduce and enable personnel planning for collaborative work. Address the blending and braiding model to address any funding source limitations. Also, consider how personnel supporting Latine, Black, and Indian students and other entities can increase their interaction with *Specialized Support* personnel.
- **District Instructional leadership Team (ILT).** With the deputy superintendent's broader oversight responsibility, have the deputy lead ILT meetings and include in their agendas results of data reviews, root cause analysis, and rotating progress reports for areas referenced in these recommendations.
- **Associate Superintendent Meetings.** Embed in principal meetings discussions about core instructional strategies designed for low achieving students, SwDs, and EL students.
- **Sharing Information.** Explore regular communication strategies for personnel

supporting all aspects of students' positive behavior, social-emotional wellbeing, physical health, and mental health to share highlights of their work and challenges. For example, have regular meetings for personnel with common interests, work to share information and successes, and request ideas to address unique issues.

- **Special Education Department.** Consider ways for staff to communicate within the department and with other district office personnel to enhance collaborative work.
- **Special Education Department Staff Turnovers.** With the senior academic officer, conduct discussions with department personnel having more turnover than others to inform follow-up actions.
- **Social Workers.** Reconsider the role of social workers as the primary facilitator of special education due process. Although likely difficult to implement, consider assigning the district representative function to principals and assistant principals. (This process is used by other school districts with which we have experience.) Alternatively, consider additional school-based personnel for this role and various strategies for support, e.g., reduced caseload, stipend, etc. Regardless of this outcome, reinforce the social worker role in the special education evaluation process and for IEP-directed related services to students.
- **Additional Adult Assistant Request.** Have a process to notify school-based personnel seeking additional adult assistance about help they may receive to understand and correctly complete the request form.

c. Written Guidance and Information

Use the process outlined in Recommendation 1d and supplement written guidance and information, embedding it in the *Specialized Support* manual with the suggestions below –

- **DPF Responsibilities.** With the involvement of associate superintendents and representative principals, establish for DPFs common responsibilities and those that may be different based on various circumstances.
- **School-based Oversight of Due Process Functions.** Consider alternatives to reliance on social workers for this purpose. For example, see the Chicago Public Schools IDEA Procedural Manual at page 8.
- **Social Workers as Related Services Provider.** Establish protocol for IEP teams to reference for use of social work as a related service to benefit from special education.
- **Collaborative OT.** Discuss with OTs challenges they have to provide collaborative OT. Depending on the results provide information that would support this approach.
- **Personnel Evaluation Process.** Assuming a process is in place, share it with special education department personnel and have a session to answer any questions.

d. Differentiated Professional Development

Supplement Recommendation 1f and subsequent actions under this heading to include the following –

- **DPFs.** After consulting with DPFs, develop a PD schedule for the remainder of the 2024-25 then for 2025-26. Differentiate PD to meet individual needs and provide universal PD for this group when new information must be consistently communicated.
- **Special Educators.** Develop and provide PD at the beginning of the school year for new special educators and those working under alternative licenses who need assistance. Identify strategies for continuing PD during the school year for these and new special educators hired during the school year.
- **SEA Crisis Prevention Training.** Ensure that training includes strategies for deescalating behavior, alternatives to restraining students, etc.

Recommendation 6. Consider current school-based special education and related service personnel allocations and improve recruitment and retention practices and outcomes.

Having an appropriate level of support for school-based special education and related services activities is necessary to accelerate SwD outcomes.

a. Data Review

Have the district MTSS leadership team representatives referenced in Recommendation 1a (including finance and human resources personnel if not involved) oversee review of the following –

- **Staffing Ratios.** Review data presented at Exhibit 5b. FTE Figures by Personnel Areas (2020-24); Exhibit 5c. Comparative MPS Non-Charter School Personnel FTEs and Ratios; Exhibit 5d. FTE Number and Vacancy Rates by Personnel Area; and Exhibit 5e. Number of District Survey Respondents & Number and Percentages with Rates Smaller than MPS.
- **Workload Study.** Along with the Staffing Ratios referenced above, review the workload study results to consider any necessary adjustments following the MPS/MFT MOA process to follow up. If not already included, consider MTSS participation, monitoring, and expected use of the SRBI process to evaluate SLD qualification.
- **Retention Data.** Review by: special educators, SEAs, SLPs, psychologists, social workers, and nurses, and by portfolio schools and schools. Use this data to identify trends to support improvement planning. Implementation Plan
- **Caseloads for SwDs in MPS Special Schools**. Review current specialized program (ASD, DCD, and EBD) caseloads for students in special schools to consider whether these require adjustment to address their more significant needs that precipitated

their restrictive placement.

- **Caseload Increases During the School Year.** With representative personnel from finance, human resources, associate superintendents, principals, and special education review data by portfolio schools showing caseload increases during the school year because of newly placed SwDs. Based on this data, consider actions to support schools, students, general educators, and special educators and SEAs impacted by these increases.
- **Redundant Electronic Data.** With feedback from stakeholders, investigate possible areas for redundant data entry on EdPlan and other platforms that could be migrated instead of double and triple entries. Also, have stakeholders identify any redundant or unnecessarily long paperwork that could be eliminated or reduced.
- **Recruitment and Retention Activities**. With representatives of finance, human resources, and personnel groups with higher vacancy rates review retention data and current recruitment activities to recommend any others most likely to be successful. Celebrate improved retention rates and reduction of reliance on higher cost contractual personnel. Consider the resources below to help identify strategies beyond those in place -

– US Office of Special Education Programs (OSEP) memorandum with a list of supported teacher initiatives and resources for retention and recruitment of special education and related personnel.
– Resource Brief for recruiting and retaining special education teachers.
– Although not written for special education personnel, this South Carolina webpage has useful approaches.

b. Implementation Plan

For each of the areas referenced above, plan for actions needed to support implementation.

c. Written Guidance and Information

Supplement Recommendation 2d and subsequent written guidance and information with information needed to implement the above activities. Also, expedite written notice to associate superintendents, principals, and other relevant personnel about the need for school leaders to have school schedules first insert time for special educators to complete their due process requirements and to develop meaningful lessons for their students.

d. Data Analysis and Reporting

Supplement Recommendation 1g and subsequent data analysis and reporting with recruitment and retention Data. To inform the above data review at Recommendation 6a, collect and report recruitment and retention data by district, and by each associate superintendent's school portfolio for special education and related services personnel.

e. Monitoring and Shared Accountability

Supplement Recommendation 1h and subsequent monitoring and shared accountability actions with monthly recruitment and retention data reports to personnel such as the following: human resources, deputy superintendent, senior academic officer, associated supervisors, etc., to track progress. For areas not showing progress, have individuals with oversight for relevant areas meet with responsible recruitment personnel to adjust implementation plan activities. (Note: cross-reference this area with discussion of the MPS Strategic Plan at Section VII. Shared Accountability for Results, Goal 3. Effective Staff.)

VI. Compliance and Operations

The following two areas are addressed in this section –

A. Special Education Compliance and Due Process Activity
B. Operations: Fiscal Issues, Third Party Billing, and Transportation

Special Education Compliance and Due Process Activity

This section addresses information about federal and state special education compliance. Generally, MPS has a relatively low level of OCR and due process complaints compared to other districts with which we have experience. Interviewees expressed high regard for monitoring and compliance personnel based on their responsiveness and knowledge. There is a need, however, to compile all guidance into a single webpage that would give all stakeholders access to updated information that governs MPS's administration, operation, and expected practices for special education and related services. Such information provides a reference for daily practices and training source.

1. Written Information

MPS shared the following information about activities to support special education procedural safeguards and compliance, which the district refers to as "due process."

Special Education Department Due Process Support

The following information addresses ways the special education department supports compliant practices.

- **Due Process Office Hours.** The special education department's compliance and monitoring unit sponsors weekly morning and afternoon sessions for experts to answer questions about the district's IEP platform (EdPlan), evaluations, etc.
- **Due Process Intensive Training.** Last August 2024 the unit sponsored "Success Factors" training for special educators.
- **Due Process Notebook.** As addressed in Section II. Disability Demographics and Eligibility, in response to a request for information about MPS's special education procedures, we received a folder with 57 separate PDF and WORD documents having random titles with no apparent order. One document, "Introduction 2018," referred to a Due Process Notebook that is updated regularly with the most recent date in the lower corner of each section. A table of contents was not included. Based on the folder's format, easy stakeholder access was not readily apparent. Only very general information is available on MPS's special education webpage.

MDE Findings Related to State Performance Plan Outcomes

MPS shared two MDE letters related to the district's SPP compliance outcomes.

- December 27, 2023 letter notified MPS that the district's policies and procedures review, as

MDE verified, demonstrated compliance. This self-review related to OSSs more than 10 days by race/ethnicity and disproportionate representation of race/ethnicity in special education and in specific disability areas based on inappropriate identification policy, procedures, or practices.

- June 28, 2024 letter notified MPS of the state's 2023-24 record review results, and six areas reflecting noncompliance. The findings were based on untimely early intervention services; timely initial evaluations and IFSP meetings for infants and toddlers; timely evaluations for transitioning Part C students with IEPs implementation for qualified children upon their third birthday; and appropriate IEPs for postsecondary transition. (Note: these findings were based on only a small sample of student records: 5 areas each reflected 1 student and 2 areas each reflected 2 students. MDE required MPS to correct the noncompliance for these identified students. Although based on a very small number of records, these findings reflect those typically received by school districts with which we are familiar.)

Complaints Filed with MDE and Requests for Due Process Hearings

The monitoring and compliance department investigates and responds to all complaints filed by parents of SwDs in consultation with MPS's internal legal department. The department works closely with MDE, families, parent advocacy agencies, and school staff to resolve most issues prior to the formal complaint process. The following summarizes information MPS shared regarding the complaints filed with MDE and requests for due process hearings –

- **2023-24.** MDE found in favor of the complainants in three cases. The first concerned a student's suspensions (requiring 49 hours of compensatory with a $1,470 cost). The second concerned IEP services for a student while in the hospital (resulting in compensatory costs of $3,090). The last related to provision of the student's IEP to the parent (requiring staff training). In two complaints MDE found MPS activities to be compliant.
- **2024-25.** One specialized transportation case resulted in $222 reimbursement to the parents, and compensatory education for $1,500. MPS is waiting to hear the results in another case. In addition, one matter was resolved through alternative dispute resolution, and a second was resolved by voluntarily providing compensatory education due to a staffing shortage (requiring private tutoring through a $3,210 reimbursable bank). At the time this information was shared, MPS had not received any requests for due process hearings for 2024-25.

Note: MPS's complaint and due process activity is much lower than other school districts with which we have experience.

2. Interviewee Feedback

Interviewee feedback provided the following information that concerns compliance, including a high regard for the monitoring and compliance department's expertise and assistance.

- There has been a recent shift that requires a manifestation determination review (MDR) prior to any SwD administrative transfer. If the MDR results in a finding that a student's behavior is manifested by their disability, any transfer must be addressed through the student's IEP.

- One hurdle is changing how "things have always been done." Written guidance is slowly being reviewed.
- There is inconsistent understanding of discipline procedures, including the MDR process. (Note: this is a complex area that is difficult to implement consistently within and across schools without a major investment of training.)

Operations: Fiscal Issues, Third Party Billing, and Transportation

This section addresses fiscal issues (including third party billing) and transportation.

1. Fiscal issues

Generally, interviewees cited concerns about the special education and finance departments' future capacity to manage the special education budget of $147 million with thousands of positions and contracts to manage. The process relies on two finance individuals, with a need to train another individual for backup and eventual transition of duties.

As previously discussed, interviewees have cited concerns about limiting activities based on funding sources. Without utilizing braided (or proportionate) funding, these limitations have unnecessarily restricted collaboration across funding streams to support personnel and students with common needs.

2. Third Party Billing (Medicaid)

Medicaid is the *only* federal revenue stream currently available to school districts without an external monetary cap. This revenue source also has no categorical funding restrictions. Various interviewees shared their perspective that MPS is not fully utilizing its opportunity to obtain reimbursement for eligible services for eligible students. One major reason given is that MPS has not authorized one person to have any coordinating authority for this area or an individual in the finance department who has expertise and supports the effort. Currently, personnel who document services that are used for third party billing have different reporting lines, e.g., special education and student support services.

Based on members of the Council SST's extensive experience in this area, such coordination and finance support is essential to maximize service documentation, and monitoring practices to maximize submission of appropriate reimbursement claims. MPS has taken various steps to increase reimbursement, e.g., piloting counselor and social worker documentation and billing.

Other states, such as Illinois, have negotiated state plans with the U.S. Center for Medicare and Medicaid Services (CMS) to include Section 504 for eligible services for reimbursement, in addition to IEP and IFSP plans. Minnesota's state plan does not yet include this coverage. Other school districts, such as the Chicago Public Schools, have increased its pool of eligible students by reaching out to potentially eligible families and supporting their application for coverage, including any continuing verification of eligibility.

3. Transportation Services

Interviewees reported that 25 MPS schools have 48 different bell times in the morning and 34 in the afternoon to accommodate SwDs having IEPs calling for different arrival and leave times. Reportedly, this model complicates transportation issues and increases cost, including funding for SEAs needed to accompany students on buses. There is a perception that guidance could be improved for bus aides, and IEP-driven bell times. These issues contribute to bus driver shortages.

Recommendation 7. Support continued special education fiscal management; improve third party billing and reimbursement; and address numerous bell times that impact transportation. Consider the following actions to address these issues.

a. Personnel Alignment

Supplement Recommendation 1a and subsequent personnel alignment provisions with the following action to help maximize third party reimbursement. As soon as possible authorize an individual having associated expertise to facilitate a group representing all personnel areas with third party documentation responsibilities. Have the individual directly report to the deputy superintendent and senior finance officer any issue requiring their attention.

b. Implementation Plan

Supplement Recommendation 1c and subsequent implementation planning components with the following –

- **Transition for Fiscal Management.** With finance and special education department representatives, review current management of special education funds. Succession plan to ensure department expertise continues with finance support to manage such areas as contract management, out of district payments, etc. With the *Specialized Support* entity, unify fiscal management both special education and *Supportive Learning* matters
- **Third Party Reimbursement.** Plan actions designed to increase MPS's receipt of third-party reimbursement.

– **Coordinating Meetings.** Have the individual authorized to oversee third party reimbursement hold a first meeting with the group referenced in Recommendation 7a to coordinate their work and share documentation challenges and training needs. At this first meeting share MPS current and trend reimbursement levels and establish a brief time frame to develop a plan for their work, including setting goals for increasing service documentation and reimbursement.

– **Report Template.** Establish a reporting template showing expected and actual documentation levels by personnel groups. Use this data at monthly follow-up meetings to measure progress and identify any need for follow-up action.

  - **Sharing Reports.** Invite the deputy superintendent to the group's first meeting and thereafter share revenue reports to the deputy, senior finance officer, and other designated administrators.
- **Transportation.** Establish a group that includes representatives from transportation, finance, special education, pertinent associate superintendents, and principals from schools having outlying bell times to plan actions to improve efficiency, coordination, and benefits to students.

c. Written Guidance and Information

Supplement the *Specialized Support* Manual, first referenced in Recommendation 2d and subsequent information with the following –

- Process for considering SwD administrative transfers and for translation of IEPs in MPS's most common languages.
- Expectations for third party documentation, including expected frequency for uploading service documentation data. (We suggest every seven days.)

d. Differentiated Professional Development

Supplement Recommendation 1f and subsequent actions under this heading to include the following –

- **Discipline Related.** Provide training for SwD discipline procedural safeguard requirements, including the manifestation determination review (MDR) process. Base training on information gathered at associate superintendent meetings, school feedback, suspension data, etc. Use hypothetical case studies to apply MDR requirements with an aim toward achieving consistent applications.
- **Third Party Reimbursement Documentation.** Provide updated information about third party reimbursement documentation responsibilities to all involved personnel. Also, inform personnel supervisors (including principals and their associate superintendents) about their responsibilities to regularly review data reports and take follow-up actions.

e. Data Analysis and Reporting

Supplement Recommendation 1h with the following for review by MTSS leadership team representatives, *Specialized Support* management, and associate superintendents for their portfolios –

- **Position Vacancies.** Accurate data reports showing vacancies by *Specialized Support* personnel area.
- **Third Party Service Documentation.** Report actual versus expected documentation rates by personnel group, school, and associate superintendent portfolios.
- **Bell times.** Benchmark schools having different bell times and update this data monthly.

f. Monitoring and Shared Accountability

Supplement Recommendation 1i and subsequent components with KPIs and monitoring for follow up actions by associated oversight administrators for: *Specialized Support* position vacancies; and third-party service documentation. Report to the MTSS district level team encountered barriers for follow-up action

VII. Shared Accountability for Results

In the fall of 2011, the Council of the Great City Schools published its report *Pieces of the Puzzle*: *Factors in the Improvement of Urban School Districts on the National Assessment of Educational Progress.* The report summarizes research the Council conducted with the American Institutes for Research (AIR) on characteristics common to urban school districts with the greatest improvements and the highest performance on the National Assessment of Educational Progress (NAEP). The first characteristic related to clear systemwide goals and districtwide accountability for results, which creates a culture of shared responsibility for student achievement. Other research finds similar results and articulates organization structures that coalesce resources to support effective teaching and accelerated learning. School districts that effectively support school leadership often demonstrate a capacity to facilitate learning and development, address barriers to learning and teaching, and govern and manage the district in a way that prioritizes good instruction. In pursuing each of these goals, districts showing improvement have mechanisms for systemic planning, program implementation, evaluation, and accountability.

Various portions of this report addressed administrative fragmentation impacting support to school personnel and students. As we have stated throughout this report, with most SwDs educated in general education classes for the majority of the school day all personnel who support general education must share accountability for practices designed to their accelerate achievement and improve their social-emotional and behavioral wellbeing.

This section includes information about various accountability structures that require a strong collaborative approach to improve student outcomes. The following are addressed below –

A. IDEA's Results Driven Accountability
B. Special Education Data Reports and Accountability System
C. MPS Strategic and Achievement and Integration Plans
D. School Improvement Planning

IDEA's Results Driven Accountability

The U.S. Department of Education' has established a uniform template for each state to report outcomes on their State Performance Plan, which has 14 indicators. MPS included in these indicators a total of 48 state targets and MPS rates. Of these targets, MPS met 41 percent.

Actions needed to meet each indicator's targets extend beyond the special education department's jurisdiction. To improve SPP indicator outcomes all administrators with oversight for personnel engaged in related SPP activities need to intentionally plan and coordinate their activities and collectively monitor results. In addition to the special education department, this includes academics and associated departments, associate superintendents, principals, student support services, etc. The SPP indicators include not only "pure" compliance activities, such as meeting required timeframes, but also performance outcomes such as SwD proficiency based on grade level academic achievement standards (AAS) and gaps with all students.

Annually state educational agencies, such as MDE, must notify each school district about its individual IDEA compliance rating based on a matrix that includes many of the SPP indicators. We asked but did not receive MPS's latest notice and the matrix results upon which the IDEA compliance determination was based.

Figures in Exhibit 6a show for each SPP Indicator MPS/MDE outcomes and state targets. The latest MDE SPP outcomes generally are based on the 2022-23 school year, with different school years noted. **Green** rates reflect met targets met and **red** rates reflect targets not met.

Exhibit 6a. SPP Indicators and MPS Outcomes

Indicator	Description	MDE	MPS	Target
1. Graduation Rate	% SwD graduating with regular diploma (2021-22)	89.89	**52.08**	≥87
2. Dropout Rate	% SwD dropping out	9.28	**13.34**	≤9.40
3. Assessment	3A. SwD participation rate			
	Grade 4 Reading	Not Provided		≥95
	Grade 8 Reading	88.87	**73.03**	
	Grade 10 Reading	77.47	**40.72**	
	Grade 4 Math	95.10	**89.45**	
	Grade 8 Math	88.27	**71.71**	
	Grade 11 Math	71.39	**28.31**	
	3B. Proficiency rate for SwDs against grade-level standards			
	Grade 4 Reading	25.69	**11.54**	≥32.0
	Grade 8 Reading	16.36	**4.57**	≥12.0
	Grade 10 Reading	21.06	NA	≥10.0
	Grade 4 Math	34.71	**9.71**	≥27.0
	Grade 8 Math	12.78	**2.33**	≥18.0
	Grade 11 Math	7.97	NA	≥22.0
	3C. Proficiency rate for SwDs against alternate standards			
	Grade 4 Reading	57.86	**48.39**	≥72.0
	Grade 8 Reading	67.57	**60.00**	≥70.0
	Grade 10 Reading	52.00	**69.99**	≥52.0
	Grade 4 Math	69.26	**63.33**	≥60.0
	Grade 8 Math	65.60	**48.00**	≥72.0
	Grade 11 Math	46.42	**10.39**	≥74.0
	3D. Proficiency rate gap between SwDs & all students against grade level standards			
	Grade 4 Reading	22.53	**18.53**	≤21.0
	Grade 8 Reading	28.12	**25.49**	≤27.0
	Grade 10 Reading	30.44	**32.00**	≥31.0
	Grade 4 Math	22.18	**19.91**	≤22.0
	Grade 8 Math	27.15	**22.12**	≤31.0
	Grade 11 Math	27.90	**29.69**	≤36.0
4A. Out-of-School (OSS)	4.A. IEP Overall rate of OSS/expul >10 Days (21-22)	6.39	**0.93**	**<4.15.**
4B. Suspension & Expulsion	4B(a) OSS/expul by race/ethnicity >10 days (21-22)	1.48	**1.82**	**≥0**
	4B(b) MPS policies, procedures, practices noncomply		**0**	**0**
5. Ed Environments	5A. % 5/kg -21 yo in regular class ≥80% of time	62.77	**47.87**	≥63.0
	5B. % 5/kg -21 yo in regular class <40% of time	10.07	**19.33**	≤9.80
	5C. % 5/kg -21 yo: sp school, residen, home/hosp	3.71	**4.01**	≤3.71
6. Preschool Environment	6A. %3-4 SwD majority of sped/RS in EC	54.80	**52.34**	≥59.52
	6B. %3-4 SwD preK separate class, school, resid	20.71	**33.83**	≤21.78

Indicator	Description	MDE	MPS	Target
7. Preschool Outcomes	7A(1). PreK SwD positive social-emotional skills **substantially increased** growth rate when 6 yo/exit	NA	**59.88**	≥64.80
	7B(1). As above for acquisition/use of knowledge/ skills	NA	**67.80**	≥64.80
	7C(1). As above for use of approp behavior to meet needs	NA	**65.32**	≥63.31
	7A(2). PreK SwD w/in age expect: positive social-emotional skills **when 6 yo or exited program**	NA	**37.24**	≥50.50
	7B(2). As above for acquisition/use of knowledge/skills	NA	**45.92**	≥64.80
	7C(2). As above for approp behavior to meet needs	NA	**63.27**	≥61.10
8. Parent Involvement	% parents of SwD report schools facilitated involvement as means to improve services/results	66.30	**77.08**	≥71.50
9. Dispro Representation	Disproportionate representation (race/ethnicity)	0	**1.72**	0
10.Dispro Representation/ Specific Disabilities	4B(b) policies, procedures, practices don't comply		**0**	0
11. Initial Eval Timely	% students evaluated ≤60 days of parent consent	100	**93.94**	100
12. EC Transition	% Part C children referred <age 3 w/IEP executed by age 3	89.39	**100**	100
13. Postsecondary Goals	% SwD 16 yo meeting IEP transition requirements	67.15	**0**	100
14.Post School Outcomes	% enrolled in higher ed w/in 1 yr of leaving HS	18.20	**30.85**	≥21.50
	% SwD above + training prog/competitive employ	56.95	**46.81**	≥61.73
	% SwD above + some other employment	72.21	**60.64**	≥75.96

Special Education Data Reports and Accountability System

The information below concerns routine special education data reports and the special education department's accountability system.

Data Reports

We asked MPS for any regular data reports available for special education administrators and local school administrators to help them manage and coordinate services, monitor performance, and ensure compliance for SwDs, and for students who are struggling academically and behaviorally. In response, the district shared the following information –

- The Tableau Data Dashboard creates reports on individual and collective progress for academic and behavioral data. Reports can be generated by student, user created groups, class, school, caseload and sorted by most demographic information including disability categories.
- Educlimber tracks individual intervention data across all educational fields including behavior and attendance. Reports are available for individual students, groups of students, grade bands, schools, or districtwide.
- The IEP system (Ed Plan) is used to create, store, and manage all special education due process documents. A compliance dashboard provides real time data by student, caseload or school. Staff can also create customized reports.

- The monitoring and compliance department conducts an internal monthly compliance audit and provides every school and site a spreadsheet with confidential information redacted. School staff use these reports as part of their special education department meetings to stay in compliance. In rare occasions when a school and site is above the targeted noncompliance rate for three consecutive months, personnel must allocate a certain portion of their budget to support due process the following school year. Department personnel also create and share monthly reports to track shortened school day, homebound services, and revocations of consent to ensure that teams are following recommended procedures and guidelines.

While these individual processes are exemplary, they would be stronger if relevant data was extracted and combined to inform teaching and learning by school.

Accountability System

We asked MPS to describe the district's system of accountability for student performance that included students with and without disabilities, e.g., school report card, dash boards, school grades, etc. The response provided the following action steps that were limited to the special education department's authority –

- Quarterly progress reports for SwDs
- Quarterly report cards for all students including SwDs
- Internal department staff who monitors due process completion.

As examples, MPS shared two documents.

- **Monthly Reports to Schools.** A 2024-25 progress report to one school reported such data as Winter Reading Risk showing 40 (81.6%) of SwDs at high risk. An area of improvement related to "High risk levels [of] Black students did not [have an associated] IEP goal in that area (most of the sample size)." Follow up action was not included.

  While sharing such information with schools is commendable, the improvement needed reflects assistance needed beyond the special education department. The high rate of SwDs with high risk levels require assistance from their general education teachers and others, in addition to their special education teachers and any SEAs.

- **Use of Restrictive Procedures.** Another document reflected a collaborative approach to address the use of restrictive procedures for SwDs, with quarterly meeting links from February 22, 2023 to December 10, 2024 (quarter 1 follow-up). Linked information was password protected and we could not review any follow up action plans.

MPS Strategic Plan and Achievement & Integration Plans

MPS has two plans with districtwide goals described below.

1. MPS Strategic Plan

According to the MPS website, the Strategic Plan contains the district's path to achieving four main goals between the fall of 2022 and spring of 2027. Each goal has four or five strategies, with

five total prioritized annually for additional resources to focus MPS's work. District staff members report progress on the prioritized strategies during quarterly Committee of the Whole School Board meetings. Reporting to the deputy superintendent, the strategic planning department oversees the Strategic Plan and its activities. The four Strategic Plan goals are: academic achievement, student well-being, effective staff, and school and district climate. (Note: Our report addressed areas each goal represented.)

As a preliminary matter, we revisit Board Policy 6121, Implementation Of Supports And Interventions, which includes the following language that is particularly relevant to the MPS Strategic Plan goals for achievement and wellbeing. The policy supports the infusion of MTSS standards in relevant portions of the Strategic Plan.

> Even the most effective core instruction will not be sufficient for every student to make adequate progress. The district must adopt a system of supports, interventions and trauma-based care to address **academic, social, emotional and behavior needs** of students who are at risk of not meeting state proficiency standards. Interventions are evidence-based actions, implemented with fidelity, the effects of which are monitored for student progress. (Emphasis added.)
>
> Effective System of Supports. The district shall adopt a multi-tiered system of instruction to assist students to be academically, socially and behaviorally successful. …

Below are descriptions of the four goals' 2024-25 prioritized strategies, selected implementation challenges from the most recently posted January 28, 2025 progress report, and our comments. We note that the Strategic Plan webpage is excellent with information that is user-friendly. All linked documents, however, are not publicly available, e.g., Goal 1.1, slide 4, "Tuesday Tips.")

Goal 1. Academic Achievement

Every student achieves their full potential through equal access to programming that is academically rigorous and connects learning with students' experience.

1.1. Provide standards-based core instruction with a focus on literacy and mathematics.

Implementation challenges:

- Reading: MDE's delay in releasing additional licenses and staff capacity or willingness to attend sessions; lack of shared data from Davis staff to principals and back to Davis staff; diverse student needs; Davis staff capacity to regularly monitor UFLI implementation at 36 sites.
- Math**:** 50% of math "look-fors" completed; and limited time with K-5 educators and principals. 6-8 iReady: balancing classroom routines and pacing guide; time for PD. Open Up Math: initiative fatigue and reluctance; time for PD.

(SST: Accelerated student reading and math outcomes reflect the extent to which every student achieves their full achievement potential. For SwDs (and low achievement students without disabilities) to succeed: written information, Davis staff support and monitoring and

PD are needed to address core instruction designed to benefit these students, supplementary tiered interventions, and high-quality supplemental SDI implementation for SwDs.)

1.2. Ensure all curriculum and instruction practices are anti-racist and sustain student cultures, languages, and experiences.

Implementation Challenges: Standards of Effective Instruction (SOEI) Task Force: Researching other models, reviewing updated literature, and developing new feasible model.

(SST: From our interview feedback there is also a need for MPS to incorporate the understanding and practice of disability culture, which has been predominantly addressed in postsecondary settings. See here, here, and here.)

Goal 2. Student Well-Being

Every student's physical and mental well-being is addressed as an integral part of their education.

2.1 Provide equitable student access to culturally responsive counseling and mental health services.

Two areas are identified for planned initiatives and work –

- Comprehensive school-based mental health system (CSMHS) with a continuum of culturally responsive and healing-centered mental health services including early identification and interventions for those students at risk and indicated support for students with more intense needs. (Note: Collaboration is included as one of five CSMHS components.)
    - *Progress Summary:* Wayfinder SEL implementation with 17 counselors and 30 social workers. In December 2024, 64 staff were trained on social-emotional and behavioral (SEB) interventions. Next steps: SEB intervention library. (Note: Contents did not include any implementation challenges.) Also described a 1:1 mental health and substance use intervention with up to 90 days of support (with connection to long term care as needed) piloted at 38 schools.
    - (SST: With high incidents of Black students with and without disability removals from schools and classes, unless specifically addressed this area of need will likely be invisible. Also, this January 25, 2025 progress summary was the first time information we received that referenced activity related to behavioral intervention training and an SEB intervention library. The progress report did not describe the SEB intervention training provided and type of information to be included in an intervention library. Also, it is unclear whether SwDs are included in the 1:1 mental health and substance use intervention pilot referenced above.)
- Data collection system to inform MPS on current and future states of student well-being. Progress summary: 1) "district team" meeting regularly to share information and make recommendations; 2) SHAPE assessment completed; and 3) contracted mental health providers using a common data collection system. Next Steps: use the climate survey/ SHAPE assessment results to develop short- and long-term priorities; and continue work

on student support personnel data collection system. No challenges were noted.

(SST: Without additional information were not able to assess the extent to which disaggregated data will show SwD needs.)

Goal 3. Effective Staff

School and district staff approach all work centered on students and equity.

3.1 Strengthen pathways and reduce barriers for talented and diverse MPS employees and potential employees to become teachers.

Through Grow You Own (GYO) marketing and recruitment plans, the 2026-27 goal is for 1.5 percent classroom teacher vacancies at school year start, with 54.3 percent of new hires identifying as Black, Indigenous, and people of color (BIPOC). In September 2024, the vacancy rate was 2.2% with 53.29 percent identifying as BIPOC.

[SST: The low overall teacher vacancy rate suggests a need to lower MPS's goal. Overall goals mask disaggregated vacancy rates that are higher for various personnel groups, e.g., special educators (8%), SEAs (6%), SLPs (13%), social workers (15%), and nurses (15%). Also, Recruitment Goals – Adult (Staff Pathways) at slide 8 mentions retention for the first time: MPS Apprenticeships (retain 14 of 15 special education year 2, cohort 1. Unless retention rates increase for all personnel areas to reduce revolving doors, recruitment and GYO efforts will never solve vacancy issues and shortages of highly qualified and experienced personnel will continue.

Goal 4. School and District Climate

MPS is known by our community as welcoming, responsive and connected.

4.1 Fully implement the climate framework to ensure all district staff, parents, and students feel heard, valued and respected.

The framework has four components: equity, representation, and anti-racism; physical and emotional safety and wellbeing; shared decision making, and voice; and relationships, trust, and communication.

Definitions of Success: 1) All staff and students will understand the four climate values and their personal impact on school and district climate; 2)75% of schools formed an equity and school climate team (ECST) that meets at least monthly; and 3) school climate student survey informs ECST work, which improves building climate.

Implementation Challenges: New staff, consistent messaging, updating PD, competing priorities, sites that combined instructional leadership teams (ILT) and equity and school climate teams (ESCT), confusion about timeline overlap of surveys for students and school climate (to inform ESCT work) and for school climate teams (to improve building climate).

(SST: It is not immediately clear why a combined ILT and ESCT is problematic as their two purposes intersect. The combination of interests addressed through a school-based MTSS leadership team, with committees, could address these issues as well as their interaction with

achievement. Also, the information does not indicate whether survey data includes student demographic information to help focus follow-up actions.)

2. Achievement and Integration Plan

Minnesota law requires each school district to comply with the Minnesota Achievement and Integration (A&I) program, which is designed to pursue racial and economic integration, increase student achievement, create equitable educational opportunities, and reduce academic disparities based on students' diverse racial, ethnic, and economic backgrounds in Minnesota public schools.

MDE A&I Equity Criteria and Plan Requirements

According to the state's website, each school district is required to develop a three-year A&I plan based on four equity criteria to guide their strategic planning –

- **Access.** Students and families have access to rigorous, high-quality educational experiences, decision-making, initiatives, resources, and viable school choice options.
- **Participation.** Enrollment and meaningful participation in rigorous career and college readiness and other academic programs, and enrichment and extra-curricular programs are proportionate to enrollment when disaggregated by race, ethnicity, and economic background.
- **Representation.** School culture, climate, staff, curriculum are inclusive, culturally relevant, and represent student and school community diversity.
- **Outcomes.** Efforts result in positive measurable outcomes not predictable by race, ethnicity, or economic background.

MDE encourages school districts to align their A&I plan with their annual World's Best Workforce (WBWF) report and plan that lists strategies for increasing positive outcomes for students. Information indicates that WBWF leadership teams can be used to develop and actively manage the A&I plan. The state identified MPS as a racially isolated district based on its higher proportion of "protected class" students (or students of color) compared to adjoining districts. As a result, MPS must submit an A&I plan and receives state funding to help support plan activities.

MPS A&I Plan

The district's A&I webpage notes that the equity and school climate department, which reports to the deputy superintendent, oversees the plan and budget. Based on its webpage, MPS identified 21 racially identifiable schools that are included in its A&I plan. These schools receive additional funding to support their targeted strategies. Based on the district's A&I Update the plan has five overall goals and three goals related to the identified schools. The current plan ends in 2026 and planning is underway for the next version.

- **Overall Goals**
  - Magnet schools implement anti-racist social and emotional strategies (using Wayfinder, Amazeworks, and Developmental Designs SEL curriculum).

  - Reduce academic achievement disparities by increasing PD through the equity and climate department to support BIPOC students.
  - Increase BIPOC student equity leadership and voice
  - Increase college and career preparation to support BIPOC students
  - PD and recruitment and retention strategies to increase BIPOC staffing
- **Racially Identifiable School Goals.** Increase –
  - BIPOC students' academic performance through PD and additional support staff (choice of family liaison, core academic teacher, and language teacher). "Schools are reporting significant success with the progression of staffing portion of this goal."
  - Summer integration literacy program to access culturally responsive teaching and materials.
  - SEL integration family engagement.

[SST: 1) Neither the state's A&I program nor WBWF program reference disability. However, ignoring student and workforce disability groups that lie within each of the broader ones removes disability visibility and most likely their lowest representative rates within all groups. 2) SwDs' leadership and voice are unlikely to be considered if not specifically addressed. 3) MPS's list (at page 8) of the 21 racially identifiable schools omits the district's two special schools attended solely by SwDs, which have Black SwD rates significantly exceeding the 20 percentage point disparity with MPS's overall rate (25%): River Bend (66%) and Harrison (70%). These schools would benefit from the activities and funding associated with this program.]

School Improvement Planning

Board Policy 6121 Implementation Of Supports And Interventions includes the following language relevant to SIP planning –

> 2. Each school shall **develop and publish a plan** within the parameters established by the Superintendent, providing interventions and multi-tiered supports to students.

MPS Accountability Statement and SIP Guidance

According to its webpage, the accountability department (under Strategic Planning) provides leadership and guidance in various areas, including School Improvement Plans (SIPs), to support schools, families, and departments with strategic planning and continuous quality improvement. One SIP area states –

> The district holds itself accountable for continuous improvement to close the achievement gap while raising achievement for all students. In this way the MPS Continuous Improvement Process addresses the needs of all schools and all academic departments.

However, the webpage does not appear to provide guidance to schools for SIP development.

SIP Portal

MPS's Achievement and Integration lists 77 school plans. These documents include the following components:

- School information, SIP writing team, mission and vision (introduction and school profile; school demographics; mission statement; vision statement; programs offered and community partners; ESSA/North Star identification status and reason
- SIP Resources with helpful links
- School improvement goals aligned with the MPS Strategic Plan
- Four implementation strategies (that did not include MTSS implementation)
- SIP One Pager
- Family Engagement Plan
- PLC aligned work
- Equity & Title I budget worksheets

Based on our review of a few random SIPs: they varied greatly, some had detailed contents and others were brief and not very informative. This variance raises the question about the extent to which SIPs are reviewed to provide feedback for improvement. For example, we found SIPs with blank pages for Resources, and PLC aligned work. Also, strategies listed were not consistently aligned with scientific research-based practices likely to accelerate reading and math achievement. Also, none of the SIPs we reviewed included attention to positive behavior support.

One notable exemplary SIP practice relates to the 2006 MPS and American Indian community memorandum of agreement (MOA). The MOA led to SIP goals aligned with "MOA American Indian Strategies and Look Fors," which was an area addressed in the SIPs reviewed. Although the area of SwDs is not the subject of an MOA, such an approach for this group of students would make their needs visible with SIP aligned activities.

Overall Comments: Shared Accountability for Results

MPS does not have an accountability structure with components to maximize the collaborative and interdependent work required to support MPS Strategic, A&I, and SIP planning. Meaningful intersections are challenged by MPS's 11 separate entities, some reporting to the deputy superintendent and others to the senior academic officer: strategic planning, equity and school climate, associate superintendents, student support services, academics, early childhood education, special education, Black student achievement, Indian education, Latine student achievement, and multilingual and magnet programming.

To maximize successful student outcomes, actions should maximize and specify office and department intersections for common work and shared accountability. Without this approach, resources and efforts will continue to be fragmented. The example referenced above regarding MPS's Accountability webpage specifying "all academic departments" and excluding others with behavior and social-emotional personnel reflected an incomplete accounting of all entities responsible for closing the achievement gap while raising achievement for all students.

Recommendation 8. Improve MPS's shared accountability for improved student outcomes.

By aligning areas targeted for improvement with shared accountability by district office administrators directly and indirectly supporting teaching and learning and school leaders, MPS will be well-suited to foster a collaborative environment that drives strategic initiatives, enhances student outcomes, and ensures accountability across all levels of the district.

a. Personnel Alignment

For actions related to SPP indicators, MPS Strategic Plan, and A&I Plan activities, identify the intersection of personnel necessary to support school-based personnel and students. For example, the achievement area requires the involvement of district personnel (academics as well as those supporting positive behavior, SEL, physical and mental health, and equity and school climate), associate superintendents, and principals. As connections are identified, add the information across planning documents.

b. Data Review

Supplement Recommendation 1b and subsequent data review elements with the following plans to identify a complete set of data that overlaps and does not overlap –

- **SPP Indicators and MPS Outcomes.** See Exhibit 6a. for MDE/MPS outcomes and SPP targets.
- **MPS Strategic Plan (Section C) and A&I Plans.** See data referred to in these plans along with other relevant data that MPS reports.

c. Implementation Plan

Use the process described at Recommendation 1c and subsequent planning activities with the following –

- **SPP indicator Outcomes.** Embed in the Strategic Plan, A&I Plan, and School Improvement Plan (SIP) template SPP indicator outcomes where such data is currently not considered.
- **MPS Strategic Plan.** Considering the following –
  - **MTSS Framework.** Embed MTSS framework principles and practices in relevant portions of the plan. This action would help to communicate the framework's foundation and support for teaching and learning.
  - **Section 1.2,** regarding sustaining student cultures, include the area of disability culture. (E.g., for reference see here, here, and here.)
  - **Section 2.1,** regarding the Comprehensive School-based Mental Health System (CSMHS) –
    - **SwDs with Intense Needs.** Include identification of, intervention for, students with more intense needs and include SwDs meeting this criteria. Use braided (proportionate) funding as necessary.

    - **Social-Emotional and Behavioral Interventions (SEB).** For personnel responsible for implementing SEB related actions, include (if not already involved) special education department personnel with high levels of associated expertise, such as psychologists, behavior specialists, and BCBAs. In addition to an SEB intervention library, plan ways to share contents with special education department representatives, including those from these areas and include them in PD activities.
    - **SEB District Team.** Have the referenced "district team" include representatives of all district office personnel with relevant expertise, such as psychologists, BCBAs, behavior specialists, social workers, and nurses. (See the School Nurse Association Mental Health webpage: As frontline healthcare professionals school nurses frequently are the first school staff to identify students with symptoms of stress, anxiety, depression, and other behavioral health challenges. They collaborate with other school healthcare professionals and community providers to support upstream approaches to improve the mental wellbeing of students.)
  - **Section 4.1. Climate Framework.** Address the stated implementation challenges for sites with combined school-based Instructional Leadership Team (ILT) and Equity School Climate Team (ESCT) and consider whether this one team approach may be beneficial to address common issues and reduce meetings with overlapping participants. Note, side meetings can address outlying issues. Also, ensure student survey data includes demographic data that would help to focus follow up actions.
- **A&I Plan.** Embed the following –
  - **Overall Goals.** Cross reference behavior strategies referenced in the MPS Strategic Plan 2.1 (CSMHS involving SEB activities) and the A&I equity and climate goal (reducing academic achievement disparities with increased equity and climate department PD to support BIPOC students). (Here too, involve special education department personnel with high SEB expertise.)
  - **Inclusion of Disability.** Reference the disability group in the A&I and WBWF plans.
    - **Disaggregated Data.** Given the race/ethnicity focus of these areas, if rules do not permit disability to be disaggregated as a separate group embed SwD data under each race/ethnicity area using risk ratios where numbers are sufficiently high.
    - **Special Schools.** Include the district's two special schools attended solely by SwDs (River Bend and Harrison) that meet MDE's criteria of racially identifiable schools. This would enable the schools to have the benefit of associated funding for planned activities. If an MDE written reason excludes these schools, expedite identification of other sources for otherwise covered activities.
- **SIP Template**. Consider the following –
  - **SIP Information.** Include in SIP guidance expanding "Look Fors" related to SwDs, modeled after the exemplary MOA American Indian Strategies.

- **Monitoring SIPs.** With representatives of district office personnel who support teaching and learning (including for EL students, SwDs, subgroup offices, etc.) have associate superintendents for their portfolio schools review SIPs. Review with each school principal and other school representatives: questions and suggestions for SIP areas for improvement. Incorporate this process on the webpage under a newly developed SIP guidance section.
- **SIP Components.** Specifically include MTSS in the SIP template pertaining to "four implementation strategies." Also include school support for SwD postschool education, training, and/or competitive employment.

- **MPS Accountability Statement.** Modify as follows the district's Accountability webpage for MPS's accountability for continuous improvement to close the achievement gap while raising achievement for all students: "In this way the MPS Continuous Improvement Process addresses the needs of all schools and all **departments supporting academic, behavior, social-emotional wellbeing.** ~~academic departments~~."

d. Written Guidance and Information

Supplement Recommendation 2d and subsequent information any written guidance and information needed for staff to implement Recommendation 8.

e. Differentiated Professional Development

Supplement Recommendation 1f and subsequent actions under this heading to include the following and other PD needed to carry out the above-referenced implementation plan –

- **SEB Interventions.** With input by associate superintendents and SEB experts, provide PD related to CSMHS Section 2.1 (see Recommendation 8c above) focusing on schools with comparatively higher OSS and ISS rates (for students – and Black students - with and without disabilities) and with data showing need. Involve the Black student achievement office in this activity.
- **SIP Planning.** Through associate superintendent meetings with principals, communicate planning changes related to this recommendation.

f. Data Analysis and Reporting

Absent a data dashboard that would include the following, have a universal center to store data, including those referenced in the SST report and these recommendations (SPP indicators, MPS Strategic Plan, A&I Plan, School Improvement Plans). In this way, all accountability indicators and plans will have consistent and complete data references. Ensure all reports have disaggregated disability data, and those showing high rate or risk ratio disparities based on race/ethnicity and gender. Consider also disaggregating data for students with and without IEPs as total data masks lower SwD achievement levels. (This also applies to EL and other student groups with concerning data.)

Also supplement Recommendation 1g and subsequent data analysis and reporting with the following –

- **MPS Strategic Plan Goal 2. CSMHS Initiative Data Collection and Reporting.** Disaggregate data by disability to ensure needs of this group of students are considered. In addition, disaggregate all data (with and without disabilities) by race/ethnicity figures and with groups having sufficiently high numbers measure them with risk ratios.
- **MPS Strategic Plan Goal 3. Effective Staff.** Disaggregate vacancy rates by personnel groups, including special educators, SEAs (by type), speech and language pathologists, social workers, and nurses. Also, collect and report retention figures by personnel group.

g. Monitoring and Accountability

Supplement Recommendation 1h and subsequent provisions with any additional KPIs relating to this recommendation. Compile a consolidated report with the above data elements to the Committee of the Whole. Ensure all linked documents have public access absent sensitive or confidential information.

Recommendation 9. Identify a project manager reporting to the deputy superintendent to coordinate and support the above recommendations that MPS will implement.

Have the project manager report monthly to the deputy implementation progress and any barriers requiring additional consideration and action.

RECOMMENDATION MATRIX

The matrix below shows for each of the eight major above recommendations a set of nine functional activities that apply in full or part to each. The matrix shows how these functions span and intersect the 8 major recommendation areas. For implementation purposes, in addition to reviewing each recommendation address each function that cross areas.

	Recommendations							
	1. MTSS Framework and Implementation	2. Referral, Assessment & Eligibility	3. Achievement Data	4. Instructional & Behavioral/ Social-Emotional Supports	5. Increased Collaboration	6. Personnel Allocation & Recruitment/Retention	7. Compliance, Fiscal Matters & Transportation	8. Shared Accountability for Results
Personnel Alignment	**1a**	**2a**		**4a**	**5a**		**7a**	**8a**
MTSS Leadership Teams	1b							
Data Review	**1c**	**2b**	**3a**	**4b**		**6a**		**8b**
Implementation Plan	1d	2c	3b	4c	5b		7b	8c
Written Guidance/Information	**1e**	**2d**	**3c**	**4d**	**5c**	**6b**	**7c**	**8d**
***Specialized Support* Manual**		2d	3c	4d	5c		7c	
Map Resources/Fill Gaps	**1f**			**4e**				
Differentiated PD	1g	2e	3d	4f	5d		7d	8e
Data Analysis/Reporting	**1h**	**2f**	**3e**	**4g**		**6c**	**7e**	**8f**
Monitoring/Accountability	1i	2g	3f	4h		6d	7f	8g

APPENDICES

APPENDIX A. PERCENT SWDS & FTE STAFF TO SWD RATIOS IN ASCENDING ORDER BY GROUP

	% IEPs	Special Educators	Paraeducators	Speech/Lang Pathologists	Psychologists	Social Workers	Nurses	Occupational Therapists	Physical Therapists
1	8%	7	4.3	26	31	26	58	64	128
2	8%	7	5.26	37	**55**	40	60	75	172
3	9%	7.6	6.3	44	55.2	56	62	103	219
4	9%	8.6	7	44	64	61	64	112	241
5	9%	9	7	47	77.7	65	67	140	283
6	9%	9	7	50	85.5	67	68	141	293
7	10%	9.1	7	58	79	69	73.5	142	349
8	10%	9.5	7	59	90	73	75	147	350
9	10%	9.7	7.6	59	94	73	76.6	154	354
10	10%	9.7	8	60	100	75	82	154	367
11	10.3%	**9.8**	8	63	100	78	83	**156**	384
12	10.4%	10	8	**65**	102	82	85	163	449
13	11%	10	8.3	68	104	86	89	171	462
14	11%	10	8.5	71	110	88	89	172	**490**
15	11%	10.3	8.6	71	110	89	89	174	492
16	11%	10.9	9.4	73	110	95	93	180	497
17	11.2%	11	9.7	73	111	96	93	181	498
18	11.2%	11	9.7	74	111	105	94	186	523
19	11.3%	11	10	74	112	115	96	187	526
20	11.4%	11	10	76	113	116	98	18	538
21	12%	11.4	10	77	115	124	98.6	199	556
22	12%	11.7	11	78	117	126	100	205	596
23	12%	12	11	79	121	126.4	104	210	599
24	12%	12	11.1	80	123	**127**	110	211	615
25	12%	12	**12**	80	123	127,3	111	216	620
26	12%	12	12.1	80	124	134	113	219	639
27	12%	12	12.1	81	124.7	135	114	225	649
28	12.3%	12	12.6	83	125	140	115	231	659
29	12.69%	12.3	12.8	84	127	142	119	240	663
30	12.5%	12.5	12.9	85	128	142	119	242	676
31	12.7%	13	12.9	89.1	129	153	120	256	680
32	13%	13	13	92	130	158	121	276	703
33	13%	13	13	93	134	160	124	265	724
34	13.1%	13	13	94	138	165	126	285	737
35	13.7%	13	13	95	140	170	127	300	761
36	13.9%	13	13	95	142	188	127	309	762
37	14%	13.4	13	95.4	144	197	129	325	772
38	14%	13.7	13	96	150	221	133	326	819
39	14%	13.8	13	96.5	151	249	142	332	823
40	14%	14	13	98	154	284	142	332	864
41	14%	14	13	100	155	300	144	344	869
42	14%	14	13.5	102.6	155	300	**145**	366	873
43	14%	14	14	103	159	303	148	367	875
44	14%	14	14	103.6	166	312	153	374	885
45	14%	14	14	104	169	334	155	384	900

Rank	% IEPs	Special Educators	Paraeducators	Speech/Lang Pathologists	Psychologists	Social Workers	Nurses	Occupational Therapists	Physical Therapists
46	14%	14	15	105	171.5	389	163	388	903
47	14.1%	14.9	15	105	178	487	163	408	953
48	14.1%	15	15	106	178	495	165	413	991
49	14.6%	15	15	108	179	525	175	417	1011
50	14.7%	15	16	110	195	557.4	178	424	1079
51	15%	15	16	111	198	652	184	431	1035
52	14.8%	15.2	16	111	199	673	184	450	1100
53	15%	15.7	16.4	112	208	705	186	470	1100
54	15%	16.0	16.6	112	210		195	473	1105
55	15.3%	16.3	16.6	112	213		199	474	1134
56	15.4%	16.3	17	114	214		206	477	1222
57	15.5%	17	17	115	214		217	494	1262
58	16%	17	17.1	116	217.5		230	498	1270
59	16%	17.0	17.9	117	218		220	518	1309
60	16%	17.2	18	121	219		241	525	1326
61	16.2%	17.1	18	127	223		245	547	1491
62	17%	17.4	18.4	128	225		248	550	1488
63	17.4%	17.5	19	130	232		266	577	1532
64	17.7%	17.8	19	133	233		386	601	1553
65	18%	18	19.1	135	240		398	616	1630
66	18%	19	20	136	243		700	644	1650
67	18%	19	20	137	263		834	693	1685
68	18%	19	20	139	265			702	1690
69	18.1%	19	20.3	140	287			713	1740
70	19%	19.5	20.5	144	295			772	1786
71	19%	20	21	158	300			810	1849
72	19.3%	20.3	21	172	319			851	1968
73	19.4%	20.6	22	192	337			873	2023
74	**19.8%**	21	22	218	376			1029	2187
75	20%	21	24	263	396			1125	2574
76	20%	21	25	265				1170	2574
77	20%	22	25,8	314				1479	2701
78	20.4%	22.6	26	341				1513	2773
79	20.5%	23	26	596				1685	2941
80	20.9%	23.5	27						
81	21%	24	31						
82	21%	24	33						
83	21%	37	56						
Avg.	**14.1%**	**14.1**	**14.6**	**118**	**174**	**251**	**170**	**397**	**1,059**

APPENDIX B. DATA AND DOCUMENTS REVIEWED

The following data and documents were requested and reviewed. Additional documents the SST reviewed are cited in this report.

DATA

1. Graduation rate for all students without IEPs AND for students with IEPs. Also, provide by race/ethnicity. Please provide rate and not numbers.
2. Drop-out rate for all students AND for students with IEPs. Also, provide by race/ethnicity.
3. Enrolled students. Number of enrolled students by grade level (by preschool, elementary, middle school – specifying grades for each level, and high school). Include any student placed in a special school operated by the district or out of district to implement an IEP.
4. Disability area. Number of students with IEPs by 3 yo, 4 yo, Kg-12 and by: specific learning disability (SLD), speech/language (S/L), other health impaired (OHI), autism, emotional disturbance (ED), intellectual disability (ID), developmental delay (DD), and other.
5. Section 504 & Health Plans. Number of students with Section 504 plans and number of students with health plans who do not have Section 504 plans. Also, provide by grade.
6. Enrolled students by race/ethnicity. Total number of enrolled students by race/ethnicity, and by race/ethnicity and gender.
7. IEP group by race/ethnicity & disability. Total number of students with IEPs, and by LD, S/L, OHI, autism, ED, ID, DD, and other by race/ethnicity.
8. IEP group by race/ethnicity and gender. Same as No. 8 by race/ethnicity and gender.
9. Enrolled ELs. Total number of English Learners (ELs) and number of long-term ELs, and by grade.
10. ELs with disabilities. Total number of ELs with IEPs and number of long-term ELs with IEPs and for both groups by LD, S/L, OHI, autism, ED, ID, DD. Same by grade.
11. Referral for initial special education evaluation. For the 2023-24 school year, number of students: with parental consent for initial evaluation, number with completed evaluations, and number found eligible by disability area (LD, S/L, OHI, autism, ED, ID, DD, other). If feasible, please provide this data by students' grade.
12. Exit Data. Number of students who exited special education for the last two years, by disability area and reason for exit.

13. Performance. For all students with IEPs, percentage meeting/exceeding proficient standard in reading and in math for last three school years. If assessments changed during this period of time, explain when they changed and any impact on results.

Alternate assessments. Number of students who took an alternate assessment and total number of students in all grades that state standard assessments were given. Indicate whether the number of alternate assessments exceeded 1% of all students eligible to take standard assessments. If so, describe the basis of the district's waiver of this standard, whether the state approved the waiver, and any steps being taken by the district to address this issue.

14. Suspensions. For 2022-23, number of students with IEPs, and students without IEPs:

a. Out-of-school suspension for following number of days: 0, 1-10, 11-20, 21-30, etc.

b. In-school suspension – same as for "a" above

c. Same as and b above by grade.

15. Suspensions. Same as 17 above by race/ethnicity.

16. Absences. For students with IEPs and without IEPs, provide number of <u>unexcused</u> absences: 0 days, 1-10 days, 11-20 days, 21-30 days, etc. Also, provide this data by grade and by race/ethnicity.

17. Educational settings

a. Children 3 to 5 years of age (outside of kindergarten)

i. Total number of students with IEPs.

ii. Number by educational environment reported to the state, e.g., at least 10 hours in EC with most services provided inside EC, special class, etc.

b. For students kindergarten/above:

i. Number of students in each educational environment reported to the state, e.g., number in general education 80% or more of the time, etc. For separate schools, indicate the number of students in any district special school, another district's special school(s), and/or nonpublic school(s). (Special school is a school attended only by students with IEPs.)

ii. Same as "i" by LD, S/L, OHI, autism, ED, ID, and other

iii. Same as "i" by grade

iv. Same as "i" by race/ethnicity

v. Same as "I" by LD, ED, OHI, autism, and ID by race/ethnicity

Special schools/out of district .. by race/ethnicity, disability, and gender

18. Special education Program/Configuration of Services. For each special education configuration (e.g., specialized program) for students with IEPs, show <u>by grade (including EC or PreK)</u> and the number of models by school. (A specialized program or class are those that are not in most schools, and to which students are placed/transported based

on the IEP.) Do not include inclusive or cross categorical classes unless students are placed in another school to attend such classes. Use separate tables for elementary schools, middle schools, high schools, district charters, magnet schools, etc.

Documents and Questions

Provide for each of the following a brief description (including any challenges and barriers), copies of relevant documents, and/or reference to district websites. To the extent possible, provide answers using a Word format and link relevant documents. If separate responses are necessary, please use the labels below for easy reference.

1. Instruction Aligned with Core Standards & Curriculum. District-wide initiatives for the provision of instruction to all students based on core curriculum aligned with state standards that includes students with IEPs.
2. Improvement planning. District-wide improvement plans and templates for school-based improvement plans that pertain to all students, including those with IEPs.
3. Multi-tiered Systems of Support (MTSS). District implementation of MTSS, including academic and positive behavior intervention and supports. Please address: the organizational structure for supporting MTSS, universal screening, progress monitoring, problem-solving, data collection and review, data reports, procedures, and training.
4. Absences. Indicate when a student is considered to be chronically absent and provide any procedures for following up with the family/student.
5. Referrals. Any initiatives taken during the past several years that relates to ensuring the appropriate referral of students for a special education evaluation and the responsibility of school principals, other school-based staff, and administrative staff for overseeing this process.
6. Instructional Support. <u>For 1) early childhood and for 2) school-aged students</u>, provide information/guidance/documents/manuals regarding any district initiatives and professional learning designed to improve instruction in the following areas:
   a. Inclusivity. Initiatives to increase education of students with IEPs within general education classrooms and to provide them with high quality instruction within that environment.
   b. Separate Classes. Instruction aligned with core curriculum for students educated in separate classes who take a regular state assessment, and instruction for students taking an alternate assessment.
   c. Literacy. Does the district sponsor any curricular materials for students with IEPs

who are reading two or more years below grade level? If so, please describe how these students are instructed with names of materials, any quality monitoring, and other information that may be useful to the Council team.

d. Mathematics. Does the district sponsor any curricular materials for students with IEPs who are performing two or more years below grade level in mathematics? If so, please describe how these students are instructed with names of materials, any quality monitoring, and other information that may be useful to the Council team.

e. Behavior. Describe types of support offered to schools and teachers for students, including those with IEPs, who exhibit behavioral challenges described to be beyond the expertise of school personnel.

f. ELs with IEPs. Provide information for ELs with respect to "a, b, c, and d" above. Also, describe how English language acquisition support is provided for students with IEPs educated in regular classes and in separate classes.

g. Assistive Technology. Describe how assistive technology is made available to students with IEPs showing need.

g. Post-Secondary Transition. Describe transition activities and services for post-secondary success, including access to community-based work experiences.

7. Configuration of Special Education. For each special education configuration model listed in #18 above, and for resource, co-teaching, etc. Briefly describe each program and placement criteria, and student to teacher/paraprofessional ratios for each program.

8. Professional Development (PD).

   a. Structure for PD. Provide the number of days available for staff development (school-based and district-wide) and any current policies regarding mandatory nature of any PD for special education personnel and for other personnel.

   b. Content. PD available for special educators, paraprofessionals, and related service providers. How is content determined?

   c. Collaborative PD. Extent to which general, special education and EL administrators collaboratively manage PD.

   d. PD Guidance. Provide any guidance documents related to the PD offered by the District as it relates to curriculum, instruction, and special needs.

9. Organizational Charts (or listing of reporting structure to help identify individuals to interview and
to understand the district's organizational structure)

a. Provide a copy of the district organization chart for central office, including detailed charts for each department, e.g., teaching/learning, budget, technology, etc.
b. Provide copy of the organization chart for special education/related services. Include and identify any non-administrative staff. For each position a very brief description of major responsibilities.
c. Briefly describe structure for superintendent's cabinet and other high-level leadership groups, and meeting frequency.

10. School-based Special Education Management. Describe school-based roles and responsibility for overseeing special education, case management for student assessments and IEP meetings, oversight, etc.

11. Special Education Teachers
    a. Allocation. Process for determining the number of special education teachers each district school requires.
    b. Hiring. Role of principals in identifying special educators to be hired at schools.

12. Paraprofessionals
    a. Types. If there is more than one position for paraprofessionals/aides, describe the various positions and briefly describe duties.
    b. Determination of need. Guidance for IEP teams to determine a student's need for additional adult support per IEPs. (Provide a copy of any documents used by IEP teams to document a student's need.)
    c. Program paraprofessional. If any program has a predetermined number of assigned paraprofessionals, please identify the program and number assigned.

13. Hiring. Role of principals in identifying paraprofessionals to be hired at schools.

14. Related Services. Process for allocating the FTE number of related services staff (e.g., social workers, psychologists) to schools.

15. Procedural Manuals. Written procedures for implementing special education and related services (under IDEA) and for implementing Section 504.

16. Union Contracts if there are union issues.

17. Compliance. The last annual notice from the state regarding the district's IDEA compliance determination and results driven accountability matrix, and summary of any state or Office for Civil Rights findings from the last two school years with findings of noncompliance. If not included in the annual notice, the district's last state performance plan results provided by the state.

18. Due process. Number of due process requests and any additional data readily available about due process cases, issues, settled, won, compensatory services, attorney fees, etc. for the last school year.
19. Data reports. Any regular data reports available for special education administrators and local school administrators to help them manage and coordinate services, monitor performance, and ensure compliance for students with disabilities; and for students who are struggling academically and behaviorally.
20. Fiscal
    a. Expenditures based on federal, state and local funds for the education of all district students and for students with IEPs. (Most current school year available)
    b. High Cost Areas. For all special education related areas that are considered to have exceptionally high costs, provide total expenditures for last two years. Also, describe concerns and any activities taken by the district to address these areas.
21. Parents. Names of any parent organizations, training for parents, and any structure for supporting parents to meaningfully participate in IEP and other meetings.
22. Accountability. Describe the district's system of accountability for student performance, e.g., school report card, dash boards, school grades, etc. Identify in each provisions relevant to students with disabilities.
23. Additional Information. Please provide any additional information that would be helpful to the team, e.g., union issues, etc.

APPENDIX C. ON-SITE AGENDAS

Minneapolis Strategic Support Team Review
Working Agenda (Subject to Change)
December 8 – 12, 2024

Internet Access for SST Members
SSID: Posted in conference room
Password: Posted in conference room

Revised 12-07-24 (9:44 pm)

Day 1 | Sunday – December 8, 2024	
SST Members Arrive at Hotel: Minneapolis Marriott City Center **Marriott City Center:** 30 S 7th St, Minneapolis, MN 55402 **Phone:** (612) 349-4000	
Dinner/Working Meeting @ 6:00 pm: Tavola (confirmed 12/2/24) 823 5th Avenue South, Minneapolis, MN 55404 (612) 389-2299	
Minneapolis: • Dr. Lisa Sayles-Adams, *Superintendent* • Ty Thompson, *Deputy Superintendent* • Dr. Tia Clasen, *Senior Academic Officer* • Dr. Deeqaifrah Hussein, *Executive Director of Special Education* • Ryan Strack, Assistant to the Superintendent and Board	**CGCS:** • ~~Dr. Ray Hart (*Executive Director, CGCS*)~~ • Dr. Nicole Mancini (*Chief of Academics, CGCS*) • Denise Walston (Chief of Curriculum, CGCS) • Sue Gamm (*Special Education Consultant, CGCS*) • Dr. Julia Peyton *(Consultant)* • Dr. Nathalie Neree *(Chief of Special Education and Diverse Learners)*

Day 2 | Monday – December 9, 2024 **Conference Room L3-305** **Monday Teams Link**		
7:15 am	***SST Members Meet in Hotel Lobby; Depart for MPS***	
7:30 am – 8:00 am	**Continental Breakfast and Setup** at Minneapolis Public Schools	SST Members
8:00 am – 9:00 am	**Senior Academic Officer**	Dr. Tia Clasen
9:00 am – 9:45 am	**Executive Director, Academics**	Maria Rollinger
9:45 am – 10:45 am	**Executive Director, Special Education**	Dr. Deeqaifrah Hussein
10:45 am – 11:15 pm	**Executive Director, Early Childhood Education**	Dr. Stacey Joyner
11:15 am – 11:45 am	**Executive Director, Multilingual and Magnet Programming** Teams	Muhidin Warfa
11:45 pm – 12:15 pm	**Working Lunch**	
12:15 pm – 1:00 pm	**Special Education Directors**	Carissa Tebben Andrew Meierding Hai-Yen Vo Dr. Courtney Holmes
1:00 pm – 1:45 pm	**Deputy Superintendent**	Ty Thompson
1:45 pm – 2:30 pm	**Associate Superintendents (3)**	Yusuf Abdullah Laura Cavender

		Dr. Shawn Harris-Berry
2:30 pm – 3:15 pm	**Executive Director, Student Support Services**	Dr. Meghan Hickey
3:15 pm – 3:45 pm	**Finance/Budget (including Medicaid)** Hybrid	Jessi Moryn Jon Clinton
3:45 pm – 4:15 pm	**Executive Director, Transportation**	Lisa Beck
4:15 pm – 4:45 pm	**Assessment/Data Reporting/Evaluation**	Sarah Hunter
4:45 pm – 5:00 pm	***SST Departure for Dinner & Brain Dump at Hotel: SST Members***	

FYI Only: Board Meeting – Tuesday, December 10, 2024 @ 4:00 pm

Day 3 | Tuesday - December 10, 2024 **Conference Room L3-305** **Tuesday Teams Link**		
7:15 am	***SST Members Meet in Hotel Lobby; Depart for MPS***	
7:30 am – 8:00 am	**Continental Breakfast and Setup** at Minneapolis Public Schools	SST Members
8:00 am – 8:30 am	**Executive Director, Human Resources Operations**	Scott Weber
8:30 am – 9:15 am	**Curriculum/Instruction – Literacy (PK-12)**	Kimberly Bice Maria Rollinger
9:15 am – 10:00 am	**Curriculum/Instruction – Math (PK-12)**	Sizi Goyah Maria Rollinger
10:00 am – 10:30 am	**Multi-Tiered System of Supports (MTSS)**	Dr. Jodi Henderson
10:30 am – 11:00 am	**Psychologists** Hybrid	Matthew Lau Kate Clayton Megan Johnson Isadora Szadokierski Elizabeth Rudrud Lisa Asperheim [INVITED, TEAMS OPTION]
11:00 am – 11:30 am	**Social Workers** Hybrid	Catherine Dalnes Tyler Dercks Asha Belk Alexandra Holzschuh Karen Jimenez Smith Samantha Wersal-Carrillo
11:30 am – 12:00 pm	**District Program Facilitators (DPFs)**	Angie Powell Gina Forman Tiffany Harris Abigail Thein
12:00 pm – 12:30 pm	**District Program Facilitators (DPFs)**	Jill Rentmeester-Disher Laura Louis-Jacques Katie Cruz Anne Silverman
12:30 pm – 1:00 pm	**Working Lunch**	
1:00 pm – 1:30 pm	**Sped PreK Teachers** Teams/Hybrid	Lauren McLeete Sheila Walker Alicia Hamilton

		Miriam Castro-Sanjuan Elizabeth Kalinoski Jenna Strain-Lutz
1:30 pm – 2:15 pm	**Sped Teachers (Self-Contained)** Teams/Hybrid	Marguerite Dowdy Steven Burth Veronica Silva Edward Bourgeois Treasure Thoreson Quang Nguyen
2:15 pm – 3:00 pm	**Sped Teachers (Resource K-12)** Teams/Hybrid	Maleah Kagan Leah Swanson Marian Williams Kirsten Ma Kendra Rimmereid Jennifer Moriarty
3:00 pm – 3:30 pm	**Special Education Paraprofessionals** Teams/Hybrid	Gayann Fleming Mikel Herb Kathleen Craig Sheryl Harten Sheryl Harten Carrie Kuschel Elizabeth Ihde
3:30 pm – 4:15 pm	**Gen Ed Teachers (PreK/Elementary)** Teams/Hybrid	4-6 [TEAMS OPTION]
4:15 pm – 4:45 pm	**Gen Ed Teachers (MS/HS)** Teams/Hybrid	4-6 [TEAMS OPTION]
4:45 pm – 5:00 pm	***SST Departure for Dinner & Brain Dump at Hotel: SST Members***	

Day 4 | Wednesday - December 11, 2024 Conference Room L3-305 Wednesday Teams Link		
7:15 am	***SST Members Meet in Hotel Lobby; Depart for MPS***	
7:30 am – 8:00 am	**Continental Breakfast and Setup** at Minneapolis Public Schools	SST Members
8:00 am – 8:30 am	**Attorney** (used for special education matters)	Liz Meske
8:30 am – 9:00 am	**Speech Pathologists** Teams/Hybrid	Erin Lawrence Erina Haubrich Alicia Hamilton Amber Honcharoff Melissa Grossman Laurie Wright Cindy Vachon
9:00 am – 9:30 am	**OT/PT** Teams/Hybrid	Kaley Czech Laurin Dalton Rebecca Armas Jolana Bernhardt Chris Anderson Janet Husbands
9:30 am – 10:00 am	**Break**	
10:00 am – 10:30 am	**Nurses** Teams/Hybrid	Amber Spaniol Shannon Schueler

		Michelle Ricart Theresa Tauer Ashley Hanson Briana Rausch Aimee Meixner
10:30 am – 11:00 am	**Transition Specialist/Supervisor**	Joe Groves
11:00 am – 11:30 am	**Transition Teachers** Teams/Hybrid	Richard Stodieck Patrick Burns Sylvia Mondane Brett Haugen
11:30 am – 12:00 pm	**Due Process and Compliance**	Nolan Murphy
12:00 pm – 12:30 pm	**Working Lunch**	
1:00 pm – 1:30 pm	**504 Plans**	Jenny Crouch
1:30 pm – 2:30 pm	**Principals – Centers/Special Day Schools**	Clint Whisler Jason Backes Malvrice Edwards
2:30 pm – 3:00 pm	**Principals – Elementary** Teams/Hybrid	Renee Montague Pao Vue Steve Searl Andrew Uhler Liliana Rodriguez Meghan O'Connor
3:00 pm – 3:30 pm	**Principals – Middle/High** Teams/Hybrid	Mai Chang Vue Naida Grussing-Neitzel Gregory Lucas Mauri Friestleben Joshua Cattledge Mary Pat Cumming
3:30 pm – 4:15 pm	**Community Members** Teams/Hybrid	[TEAMS OPTION]
4:15 pm – 5:00 pm	**Caregivers (Parent Advisory Council)** Teams/Hybrid	Special Education Advisory Council (SEAC) [TEAMS OPTION]
5:00 pm	***SST Departure for Dinner & Brain Dump at Hotel: SST Members***	

Day 5 | Thursday – December 12, 2024 Conference Room L3-305		
7:30 am	***SST Members Meet in Hotel Lobby; Depart for MPS***	
8:00 am – 8:30 am	**Team Breakfast at** Minneapolis Public Schools	SST Members
9:00 am – 10:00 am	**Debrief with Superintendent**	CGCS SST Members
10:00 am – 11:00 am	**Internal SST Meeting @ MPS in Conference Room**	Final debriefing with SST
11:00 am	***Adjournment & Departures***	

Virtual | TBD - December 20, 2024 (Dr. Ray Hart) https://www.mpschools.org/about-mps/school-board		
3:00 pm-3:45 pm EST	**Board Member District At-Large**	Joyner Emerick
11:00 am-11:45 am EST	**Board Member District 1**	Abdul Abdi (abdul.abdi@mpls.k12.mn.us)

Additional Interviews (Post Visit)

- Jennifer Simon, Director of American Indian Education
- Marion Tizon, Director of Latin Achievement. Director, OLA,
- Deena Luna, Director of Black Student Achievement.
- Dr. Emily Olson, Talent Management - Professional Development
- Tamuriel Grace, Executive Director, Equity and School Climate:
- Helen Pommier (budget finance/sped also); Carissa Tebben and Jessi Moryn (special education: finance/grants)
- Matthew Lau, Manager of School Psychology
- Amy Flodin, Third Party Reimbursement (Medicaid)

APPENDIX D. STRATEGIC SUPPORT TEAM MEMBERS

Dr. Nicole Mancini, CGCS Chief of Academics. Nicole assists urban districts in enhancing instructional systems to boost student achievement. Before joining the Council, Nicole served as the chief academic officer for Florida's Broward County Public Schools, providing strategic communication and support to school and district administrators, coaches, and teachers on effective teaching and learning practices. She was also the vice president of educational services for the Florida Speech and Hearing Association and an adjunct faculty member for Florida Atlantic University, teaching early childhood and clinical education courses. Nicole has a B.A. in Psychology (Cum Laude), Master of Science in Speech Language Pathology, and completed the necessary coursework for Educational Leadership Certification from Florida Atlantic University. She has a Doctorate in Education with a focus on Child and Youth Studies: Early Literacy and Reading from Nova Southeastern University. She also holds her Certificate of Clinical Competency in Speech Language Pathology (CCC-SLP) from the American Speech-Language-Hearing Association and her Speech Language Pathologist Professional License from the State of Florida Department of Health.

Sue Gamm, JD, National Expert and CGCS Consultant. Sue is a special educator/attorney who has spent more than 40 years specializing in the systemic improvement and effective education of students with disabilities and those with academic and behavioral challenges. Sue has blended her unique legal/special education programmatic expertise with her experiences as the chief specialized services officer for the Chicago Public Schools (CPS), attorney/division director for the Office for Civil Rights (US Department of Education), and special educator to become a highly regarded national expert as an author, consultant, presenter, and evaluator. While with CPS, Sue co-chaired the district's initiative to develop alternative and safe schools with a budget of $12 million. Since her 2002 retirement from CPS, Sue has worked in 34 states/District of Columbia with 72 school districts and five state educational agencies to improve instruction and support for students with disabilities. She has written special education standard operating procedure manuals and/or MTSS for 10 school districts, and has shared her knowledge of IDEA, Section 504, and the Americans with Disabilities Act, and related issues at more than 70 national, state, and local conferences. Sue has authored/co-authored numerous periodicals and publications, including Online Guide to RTI-Based LD Identification Toolkit (National Center for Learning Disabilities); Using Multi-Tiered System of Supports (Council of the Great City Schools) and Disproportionality in Special Education: Identifying Where and Why Overidentification of Students Occurs (LRP Publications). She has testified before Congressional and Illinois legislative committees and helped to prepare U.S. Supreme Court Amicus Curiae briefs for the Council of Great City Schools and has served as an expert witness in nine special education federal court cases.

Nathalie M. Nérée, Ph.D., Chief of Special Education and Diverse Learners, is a distinguished educator and leader in educational administration with a wealth of experience spanning diverse educational settings. She oversees the Office of Special Education and Diverse Learners and the

strategic delivery of educational services for diverse populations including Special Education, Multilingual, Multi-Tier System of Support (MTSS), and gifted students. Nathalie provides leadership in ensuring compliance with federal and state regulations, crafting policies, and managing high-priority projects aimed at enhancing educational outcomes. Prior to her current role, she held significant positions including Executive Director of Instructional Quality at Chicago Public Schools and Director of Special Education at Broward County Public Schools, where she managed comprehensive special education programs and led initiatives to improve instructional quality and support services for students with disabilities. With a Ph.D. in Education from Capella University and a background in Cross-Categorical Special Education, Nathalie combines academic rigor with practical leadership to drive systemic improvements in educational equity and inclusion. She is also an adjunct professor at Mary Baldwin University, imparting her knowledge and expertise to aspiring educators. Nathalie is deeply committed to advocacy and community engagement, serving on various boards and committees focused on education and social justice. Fluent in English, French, and Haitian Creole, she leverages her multilingual proficiency to foster inclusive educational environments.

Julia Peyton, Ph.D., is an educational consultant specializing in data analysis for reading and math interventions, curriculum review for publishing companies, and providing technical assistance to state and local education agencies. She has developed comprehensive reports on student subgroups and conducted evaluations of state assessment data to enhance intervention strategies. Julia holds a bachelor's degree in special education and early childhood psychology from Gonzaga University, a master's in special education with a focus on Specific Learning Disabilities From UNC-Chapel Hill, and a Ph.D. in Education as a Research Careers Fellow from the University of Washington. Her research interests include special education, early literacy, and teacher preparation. Her initial research work spanned 7 years at the Washington Research Institute, where she helped design and field-test a tutoring program for at-risk first graders. Throughout her career she has worked at universities, publishing companies (17 years), and policy organizations emphasizing the translation of research into practical educational applications. Julia is committed to improving educational outcomes through evidence-based practices.

Denise M. Walston is the Chief of Curriculum/Director of Mathematics for the Council of the Great City Schools. She works with the CGCS to provide high leverage support on implementation of college-and career-ready standards for the four core content areas in urban school districts. Denise retired from Norfolk Public Schools as the Senior Coordinator of K-12 Mathematics. Her responsibilities included the development of a K-12 mathematics curriculum; providing job-embedded professional development; leverage resources to provide quality professional development for teachers, teacher leaders, and administrators. During her tenure, Norfolk Public Schools embarked on an Algebra For ALL initiative which resulted in more than 50% of students completing algebra by the end of grade eight while simultaneously improving student achievement and closing achievement gaps in mathematics. She was an active member of several statewide committees that assisted in the development of Virginias' statewide mathematics

specialist program. Denise has served in several leadership positions in mathematics education, including board member for the National Council of Teachers of Mathematics, 1st Vice-President of the National Council for Mathematics Supervision, past president of the Virginia Council for Mathematics Supervision, and a board member for the Virginia Mathematics and Science Coalition. She currently serves on the board of Student Achievement Partners, Illustrative Mathematics, and an advisor to Just Equations. Ms. Walston received her B.A. degree from The University of North Carolina at Greensboro in mathematics and history, her M.Ed. in mathematics education from Old Dominion University, and has completed additional study at The College of William and Mary and at the Woodrow Wilson Institute (Princeton University).

APPENDIX E. ABOUT THE COUNCIL AND HISTORY OF STRATEGIC SUPPORT TEAMS

The Council of the Great City Schools is a coalition of 78 of the nation's largest urban public-school systems. The organization's Board of Directors is composed of the superintendent, CEO, or chancellor of schools and one school board member from each member city. An executive committee of 24 individuals, equally divided in number between superintendents and school board members, provides regular oversight of the 501(c)(3) organization. The composition of the organization makes it the only independent national group representing the governing and administrative leadership of urban education and the only association whose sole purpose revolves around urban schooling.

The mission of the Council is to advocate for urban public education and to assist its members in to improve and reform. The Council provides services to its members in the areas of legislation, research, communications, curriculum and instruction, and management. The group also convenes two major conferences each year; conducts studies of urban school conditions and trends; and operates ongoing networks of senior school district managers with responsibilities for areas such as federal programs, operations, finance, personnel, communications, instruction, research, and technology. Finally, the organization informs the nation's policymakers, the media, and the public of the successes and challenges of schools in the nation's Great Cities. Urban school leaders from across the country use the organization as a source of information and an umbrella for their joint activities and concerns.

The Council was founded in 1956 and incorporated in 1961 and has its headquarters in Washington, DC. Since the organization's founding, geographic, ethnic, language, and cultural diversity has typified the Council's membership and staff. The following table lists the Council's history of Strategic Support Teams.

City	Area	Year
Albuquerque		
	Facilities and Roofing	2003
	Human Resources	2003
	Information Technology	2003
	Special Education	2005 & 2018
	Legal Services	2005
	Safety and Security	2007
	Research	2013
	Human Resources	2016
	Special Education	2018
Anchorage		
	Finance	2004
	Communications	2008
	Math Instruction	2010

City	Area	Year
	Food Services	2011
	Organizational Structure	2012
	Facilities Operations	2015
	Special Education	2015
	Human Resources	2016
	Benefits	2023
	Purchasing and Warehouse Dept	2024
Atlanta		
	Facilities	2009
	Transportation	2010
	Classified Staffing	2019
	Teaching and Learning	2020
	Student Support Services	2021
Aurora		
	Information Technology	2019
	Curriculum and Instruction	2023
Austin		
	Special Education	2010
Baltimore		
	Information Technology	2011
Birmingham		
	Organizational Structure	2007
	Operations	2008
	Facilities	2010
	Human Resources	2014
	Financial Operations	2015
	Financial Operations	2024
Boston		
	Special Education	2009
	Curriculum & Instruction	2014
	Food Service	2014
	Facilities	2016
	Special Education	2022
	Safety and Security	2022
	Transportation	2022
	Human Resources	2024

City	Area	Year
Bridgeport		
	Transportation	2012
Broward County (FL)		
	Information Technology	2000
	Food Services	2009
	Transportation	2009
	Information Technology	2012
	Information Technology	2018
	Facilities Operations	2019
	Information Technology	2022
	Procurement and Warehousing	2024
Buffalo		
	Superintendent Support	2000
	Organizational Structure	2000
	Curriculum and Instruction	2000
	Personnel	2000
	Facilities and Operations	2000
	Communications	2000
	Finance	2000
	Finance II	2003
	Bilingual Education	2009
	Special Education	2014
	Facilities Operations	2019
Caddo Parish (LA)		
	Facilities	2004
Charleston		
	Special Education	2005
	Transportation	2014
	Finance	2019
Charlotte-Mecklenburg		
	Human Resources	2007
	Organizational Structure	2012
	Transportation	2013
	Information Technology	2022
Chicago		
	Warehouse Operations	2010
	Special Education I	2011
	Special Education II	2012

City	Area	Year
	Bilingual Education	2014
Christina (DE)		
	Curriculum and Instruction	2007
Cincinnati		
	Curriculum and Instruction	2004
	Curriculum and Instruction	2009
	Special Education	2013
	Human Resources	2023
Clark County		
	Operations	2019
	Special Education	2019
Cleveland		
	Student Assignments	1999, 2000
	Transportation	2000
	Safety and Security	2000
	Facilities Financing	2000
	Facilities Operations	2000
	Transportation	2004
	Curriculum and Instruction	2005
	Safety and Security	2007
	Safety and Security	2008
	Theme Schools	2009
	Special Education	2017
	Safety and Security	2023
	Information Technology	2024
Columbus		
	Superintendent Support	2001
	Human Resources	2001
	Facilities Financing	2002
	Finance and Treasury	2003
	Budget	2003
	Curriculum and Instruction	2005
	Information Technology	2007
	Food Services	2007
	Human Resources	2020
	Transportation	2020
	Information Technology	2023
Dallas		

City	Area	Year
	Procurement	2007
	Staffing Levels	2009
	Staffing Levels	2016
Dayton		
	Superintendent Support	2001
	Curriculum and Instruction	2001
	Finance	2001
	Communications	2002
	Curriculum and Instruction	2005
	Budget	2005
	Curriculum and Instruction	2008
	Organizational Structure	2017
Denver		
	Superintendent Support	2001
	Personnel	2001
	Curriculum and Instruction	2005
	Bilingual Education	2006
	Curriculum and Instruction	2008
	Common Core Implementation	2014
Des Moines		
	Budget and Finance	2003
	Staffing Levels	2012
	Human Resources	2012
	Special Education	2015
	Bilingual Education	2015
Detroit		
	Curriculum and Instruction	2002
	Assessment	2002
	Communications	2002
	Curriculum and Assessment	2003
	Communications	2003
	Textbook Procurement	2004
	Food Services	2007
	Curriculum and Instruction	2008
	Facilities	2008
	Finance and Budget	2008
	Information Technology	2008
	Stimulus planning	2009

City	Area	Year
	Human Resources	2009
	Special Education	2018
Durham		
	Operations	2019
East Baton Rouge		
	Human Resources	2021
	Special Education	2022
	Bilingual Education	2022
El Paso		
	Information Technology	2019
Fresno		
	Curriculum and Instruction	2012
	Special Education	2018
	Special Education	2024
Guilford County		
	Bilingual Education	2002
	Information Technology	2003
	Special Education	2003
	Facilities	2004
	Human Resources	2007
	Transportation	2017
Hawaii		
	Financial Operations	2019
	Facilities	2019
	Organization	2024
Hillsborough County		
	Transportation	2005
	Procurement	2005
	Special Education	2012
	Transportation	2015
	Finance	2020
Houston		
	Facilities Operations	2010
	Capitol Program	2010
	Information Technology	2011
	Procurement	2011
	Finance	2021
	Safety and Security	2022

City	Area	Year
Indianapolis		
	Transportation	2007
	Information Technology	2010
	Finance and Budget	2013
	Finance	2018
Jackson (MS)		
	Bond Referendum	2006
	Communications	2009
	Curriculum and Instruction	2017
Jacksonville		
	Organization and Management	2002
	Operations	2002
	Human Resources	2002
	Finance	2002
	Information Technology	2002
	Finance	2006
	Facilities operations	2015
	Budget and Finance	2015
	Budget and Finance	2024
Kansas City		
	Human Resources	2005
	Information Technology	2005
	Finance	2005
	Operations	2005
	Purchasing	2006
	Curriculum and Instruction	2006
	Program Implementation	2007
	Stimulus Planning	2009
	Human Resources	2016
	Transportation	2016
	Finance	2016
	Facilities	2016
	Curriculum and Instruction	2016
	Information Technology	2022
Little Rock		
	Curriculum and Instruction	2010
	Curriculum and Instruction	2023
Los Angeles		

City	Area	Year
	Budget and Finance	2002
	Organizational Structure	2005
	Finance	2005
	Information Technology	2005
	Human Resources	2005
	Business Services	2005
Louisville		
	Management Information	2005
	Staffing Levels	2009
	Organizational Structure	2018
Memphis Shelby County		
	Information Technology	2007
	Special Education	2015
	Food Services	2016
	Procurement	2016
	Curriculum and Instruction	2025
Miami-Dade County		
	Construction Management	2003
	Food Services	2009
	Transportation	2009
	Maintenance & Operations	2009
	Capital Projects	2009
	Information Technology	2013
Milwaukee		
	Research and Testing	1999
	Safety and Security	2000
	School Board Support	1999
	Curriculum and Instruction	2006
	Alternative Education	2007
	Human Resources	2009
	Human Resources	2013
	Information Technology	2013
	Human Resources	2019
Minneapolis		
	Curriculum and Instruction	2004
	Finance	2004
	Federal Programs	2004
	Transportation	2016

City	Area	Year
	Organizational Structure	2016
	Special Education	2025
Nashville		
	Food Service	2010
	Bilingual Education	2014
	Curriculum and Instruction	2016
Newark		
	Curriculum and Instruction	2007
	Food Service	2008
New Orleans		
	Personnel	2001
	Transportation	2002
	Information Technology	2003
	Hurricane Damage Assessment	2005
	Curriculum and Instruction	2006
New York City		
	Special Education	2008
Norfolk		
	Testing and Assessment	2003
	Curriculum and Instruction	2012
	Transportation	2018
	Finance	2018
	Facilities Operations	2018
Omaha		
	Buildings and Grounds Operations	2015
	Transportation	2016
Orange County		
	Information Technology	2010
Palm Beach County		
	Transportation	2015
	Safety & Security	2018
Philadelphia		
	Curriculum and Instruction	2003
	Federal Programs	2003
	Food Service	2003
	Facilities	2003
	Transportation	2003

City	Area	Year
	Human Resources	2004
	Budget	2008
	Human Resource	2009
	Special Education	2009
	Transportation	2014
	Curriculum and Instruction	2019
	Organizational Structure	2023
	Transportation	2023
Pittsburgh		
	Curriculum and Instruction	2005
	Technology	2006
	Finance	2006
	Special Education	2009
	Organizational Structure	2016
	Business Services and Finance	2016
	Curriculum and Instruction	2016
	Research	2016
	Human Resources	2018
	Information Technology	2018
	Facilities Operations	2018
Portland		
	Finance and Budget	2010
	Procurement	2010
	Operations	2010
Prince George's County		
	Transportation	2012
Providence		
	Business Operations	2001
	MIS and Technology	2001
	Personnel	2001
	Human Resources	2007
	Special Education	2011
	Bilingual Education	2011
	Bilingual Education	2019
Puerto Rico		
	Hurricane Damage Assessment	2017
	Bilingual Education	2019
Reno		

City	Area	Year
	Facilities Management	2013
	Food Services	2013
	Purchasing	2013
	School Police	2013
	Transportation	2013
	Information Technology	2013
	Special Education	2023
Richmond		
	Transportation	2003
	Curriculum and Instruction	2003
	Federal Programs	2003
	Special Education	2003
	Human Resources	2014
	Financial Operations	2018
Rochester		
	Finance and Technology	2003
	Transportation	2004
	Food Services	2004
	Special Education	2008
	Human Resources	2022
	Operations	2022
Sacramento		
	Special Education	2016
	Human Resources	2022
San Antonio		
	Facilities Operations	2017
	IT Operations	2017
	Transportation	2017
	Food Services	2017
	Human Resource	2018
San Diego		
	Finance	2006
	Food Service	2006
	Transportation	2007
	Procurement	2007
San Francisco		
	Technology	2001
St. Louis		

City	Area	Year
	Special Education	2003
	Curriculum and Instruction	2004
	Federal Programs	2004
	Textbook Procurement	2004
	Human Resources	2005, 2022
	Transportation	2023
St. Paul		
	Special Education	2011
	Transportation	2011
	Organizational Structure	2017
Seattle		
	Human Resources	2008
	Budget and Finance	2008
	Information Technology	2008
	Bilingual Education	2008
	Transportation	2008
	Capital Projects	2008
	Maintenance and Operations	2008
	Procurement	2008
	Food Services	2008
	Capital Projects	2013
	Transportation	2019
Stockton		
	Special Education	2019
Toledo		
	Curriculum and Instruction	2005
Washington, D.C.		
	Finance and Procurement	1998
	Personnel	1998
	Communications	1998
	Transportation	1998
	Facilities Management	1998
	Special Education	1998
	Legal and General Counsel	1998
	MIS and Technology	1998
	Curriculum and Instruction	2003
	Budget and Finance	2005
	Transportation	2005

City	Area	Year
	Curriculum and Instruction	2007
	Common Core Implementation	2011
Wichita		
	Transportation	2009
	Information Technology	2017