

**INDEPENDENT EVALUATION OF THE
BALTIMORE COUNTY PUBLIC SCHOOLS
SPECIAL EDUCATION PROGRAM**

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BALTIMORE COUNTY PUBLIC SCHOOLS

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FOREWORD

We would like to thank Superintendent Dr. Joe A. Hairston, Deputy Superintendent of Curriculum and Instruction Christine Johns, and the Board of Education for supporting this study. Throughout the study, Executive Director Ron Boone and Director Judy Glass assisted in the research by providing the Consultants with firsthand knowledge of the overall operational programs of the Baltimore County Public Schools. We would also like to thank the staff of the Department of Federal and State Programs and the Office of Special Education for their assistance and support, particularly Administrative Assistant Maura Taylor who provided great assistance in scheduling meetings, interviews and gathering documents, as needed. We would also like to recognize the staff of the Office of Special Education who assisted the Consultants in the study. Throughout the study, staff facilitated the Consultants' efforts by making time available for interviews and site visitations. A special note of thanks is extended to the Citizens Advisory Committee for Special Education (CACSE). Chairwoman Kelli Nelson and Vice Chairwoman Jasmine Shriver provided assistance and ongoing support for this study.

I. ISSUES AND CONCERNS

The purpose of this study was to conduct an independent evaluation of the special education program operated by the Baltimore County Public Schools (BCPS).

The major activities of the Consultants were to:

1. Determine if the BCPS special education staffing is appropriate as it is currently structured, in view of the Individuals With Disabilities Education Act (IDEA) 97, and is staffing appropriate, including staffing of administration, psychologists, nurses, and other support personnel and;
2. Are the programs contracted with other providers cost effective for the BCPS and should the BCPS consider alternative delivery systems, and;
3. Is the BCPS able to maintain compliance with state and federal requirements within the resources available, and;
4. Do programs operated within the BCPS exceed federal and state mandates and is the BCPS compliant with state and federal laws; and;
5. Are appropriate steps taken to assure the Least Restrictive Environment for all students including the following?
 - ③ Are environments at schools open and welcoming to students and parents, and;
 - ③ Has the BCPS planned for appropriate space for special education classrooms, related services and instructional services personnel, and;
 - ③ Are all special education program options age appropriate for the students being served, and;
 - ③ Is the teaching staff appropriately certificated for the students being served, and;
 - ③ Does the BCPS provide for maximum interaction between special education students and their non-disabled peers, and;

- ③ Do special education students matriculate with their non-disabled peers, and;
 - ③ Does the BCPS provide for all students, including the disabled in their local neighborhood school?
6. Are the professional development activities of the BCPS appropriate for the special education students being served with regard to the following:
- ③ Are professional development activities designed for all student needs, including the students with disabilities, and;
 - ③ Are professional development activities open to special education personnel and, if so, to which special education personnel, and;
 - ③ How does the BCPS determine what professional development activities will be provided each year, and;
 - ③ What personnel are involved in determining professional development activities, and;
 - ③ Are special education and general education parents involved in determining professional development activities, and;
 - ③ Are federal and state funded comprehensive professional development monies spent in an appropriate manner?
7. Has the BCPS established and implemented appropriate cost containment procedures with regard to special education programs?
8. A review of the funding of the BCPS as it relates to the above issue will be made.
9. Does the BCPS have an appropriate transportation system for the provision of services to children with disabilities and are travel times appropriate?
10. What are the implications for the BCPS of the number of foster home children placed within the school system?
- ③ Is the BCPS impacted by these placements and to what degree, and;
 - ③ Are children placed in group homes provided for in an appropriate manner, and;
 - ③ Are some schools impacted in an inappropriate manner, with regard to their ability to provide compliant services to students with disabilities, and;

③ Are these students assessed and placed in a compliant and timely manner?

11. Recommendations will be made in all areas of the study.

II. BACKGROUND

The Study was undertaken during the months of September, 2003 through May, 2004. Interviews were conducted with a wide range of BCPS personnel, including special education support personnel, site level personnel, and both general and special education staff. Interviews were also conducted with leadership from the Citizen Advisory Committee for Special Education. Meetings were held with the Executive Directors of Schools for the 5 geographic areas within the BCPS. Several parent input sessions were scheduled across the system at varying times and locations. Notification of parent input sessions was distributed and input from parents and others was welcomed by the Consultants, through e-mail, mail and telephone calls. The Consultants regularly attended CACSE monthly meetings and provided information on the progress of the study and received comments and other input from members of the CACSE. Two meetings were conducted with Maryland State Department of Education staff, including one of these meetings with the Assistant Superintendent for Special Education. Several meetings were conducted with personnel from related organizations and advocacy groups.

Site visits were made at high schools, middle schools and elementary schools, as well as the four special education sites. An effort was made to gain information and input from schools within all geographic areas of the school system. Interviews were conducted with the administrative and support staff, the Office of Special Education, including the Executive Director of State and Federal Programs, and the Director of Special Education. Interviews were also conducted with psychologists, speech and language therapists and other related service personnel, such as transition facilitators and nurses. Meetings were held with administrative personnel from the Departments of Human Resources, Technology, and Transportation. A review of the financial support for several Maryland school districts was made in order to determine comparisons of staffing and support for special education, as well as financial support for special education within the State.

Baltimore County Public Schools provides educational services to approximately 108,000 students within Baltimore County. The school system provides services to approximately 14,000 special education students and approximately 1,600 pre-school students, including infants and toddlers programs.

The demographic make up of the communities served by the school system is both complex and dynamic. The BCPS basically surrounds the City of Baltimore on 3 sides

and the communities surrounding the city are greatly influenced by the city. The geographic area of the county is made up of a number of communities representing very diverse populations. It is important to understand that some of the issues raised by the study, such as the placement of students in foster homes within the school system, reflect many of the issues of a dynamic and changing population base. It is likely that this dynamic population base will continue for some time with the issue of population mobility within the school system.

The county has changed greatly in the period after 1990. The population of the county has increased from 692,134 to 754,292, an increase of 9 percent. The minority population has grown from 84,541 to 151,600, an increase of 79 percent. The number of public schools has grown from 146 to 162. BCPS student enrollment has grown from 86,841 to over 108,000 an increase of 23 percent. Minority enrollment has grown from 18,069 to 42,928 in 2002, an increase of 138 percent. ESOL enrollment has grown from 873 to 2,123 in 2002 an increase of 143 percent. Free and reduced priced meals has grown from 12.6 percent of the student population to 27.2 percent in 2002. The number of teachers employed by the school system has grown from 5,300 FTE to 6,989 FTE in 2000, an increase of 32 percent.

All state and federal special education funds flow directly to the BCPS, and the school system is responsible for all required reporting under IDEA and Maryland law and regulations. The BCPS is responsible for ensuring that all students with disabilities residing within the school system have access to special education programs and services, as appropriate to meet their individual needs, as required by Code of Maryland Administrative Regulations (COMAR) and the IDEA.

III. STUDY DESIGN

The study was designed to complete a review of all documents related to the provision of special education programs and services to students within the BCPS. The purpose of the study was also to verify that special education services and programs were being provided to students with Individual Education Programs (IEPs) in a free and appropriate manner and in the least restrictive environment (LRE) as defined by the IDEA, as reauthorized in 1997. The process used to make these determinations included: a review of documents, a review of records, interviews and site visitations. The consultant team was comprised of individuals with extensive experience in special education law, finance, program and transportation. The study was to make recommendations concerned with improving the delivery of services in efficient and cost effective ways, while maintaining or improving the education level to students with IEPs.

The Study was undertaken during the months of September, 2003 through May, 2004. Approximately 150 BCPS staff were interviewed, either in individual interviews or in

group interviews. Approximately 100 documents were reviewed.

A total of 20 elementary, middle, and high schools were visited with some schools receiving more than one visit. The following schools were visited: Battle Monument; Bear Creek; Chatsworth; Chesapeake High; Deep Creek Middle; Dogwood; Dulaney High; Franklin Middle; Lansdowne High; Maiden Choice; Pikesville High; Pine Grove Middle; Randallstown High; Ridge Ruxton; Ridgely Middle; White Oak; Winfield; Woodlawn High; and Woodlawn Middle.

Approximately 40 focus groups were held with a wide range of BCPS personnel including principals and other school administrators, special education support personnel, general and special education teachers, psychologists, speech and language therapists, and other related services personnel such as transition facilitators, counselors, and nurses. Numerous meetings were held with individuals. Meetings were held with administrative personnel from the Departments of Human Resources, Technology, Transportation, and Student Support Services. In addition, two meetings were held with staff from the Maryland State Department of Education, including the State Assistant Superintendent for Special Education. Several meetings were conducted with personnel from the Maryland Disability Rights Advocates, the Baltimore County Disability Council and the Citizens Advisory Council on Special Education.

Three parent input sessions were scheduled across the school system at varying times and locations. Notification of parent input sessions was distributed and input from parents and others was welcomed by the Consultants through e-mail, mail, telephone calls and at the annual Staffing Plan meetings.

A review of the staffing support for several Maryland school systems was made in order to determine comparisons of staffing and support for special education, as well as financial support for special education within the state.

All information gathered was reviewed and an analysis completed comparing the process and procedures used in BCPS and those required in either Federal law and regulations or Maryland law and regulations, including:

1. The Individuals with Disability Education Act (P. L. 105-17) and Regulations. (IDEA)
2. Code of Maryland Administrative Regulations (COMAR).
3. No Child Left Behind Act.

For a list of documents see Appendix 1.

IV. FINDINGS AND DISCUSSION

This section of the report is concerned with the major issues defined in Chapter I.

1. Is the BCPS's special education staffing appropriate as it is currently structured, in view of IDEA 97, and is staffing appropriate, including staffing of administration, psychologists, nurses, and other support personnel?

Site visits, interviews with BCPS personnel, and a review of the system's special education documents and correspondence provided evidence that the BCPS is well organized for administration of general education. However, special education services are not administratively supervised in the same geographic pattern. This well-developed area organization takes into account the needs of a large population covering a large geographic area. The organizational structure for the administration of general education and all the related parts of administration is developed in five areas, with each region having an Executive Director of Schools, who reports directly to the Superintendent. However, special education is organized for administration and leadership over seven areas of the school system with Cluster Leaders who report centrally to the Director of Special Education. While the system was reorganize in June of 2001 in order to bring a consistent structure, Special Education has had a greater challenge adjusting. This causes confusion for parents, general educators and related agency personnel. It also has the effect of providing an image of two administrations within the school system. Of particular concern is the fact that the Department of Federal and State Programs and the Office of Special Education, have responsibility for communicating federal and state legal requirements and supporting schools in meeting these requirements. However, the Executive Directors of Schools within the five areas supervise and evaluate the principals. Thus, legal compliance within the schools is not assured unless the Executive Directors of Schools, principals, and other school administrators have a commitment and a desire to make their schools compliant.

Any restructuring of staffing including administrative staffing must be provided in a manner which causes a blending of general education and special education. The special education delivery system needs to parallel the general education administrative structure of the school system as a whole.

Interviews with the Executive Directors of Schools of the five areas provided support for an organizational structure for special education, which reflects the organizational structure of the school system as a whole. Special education cluster leaders provided input that they felt at a disadvantage in dealing with site principals as they were teachers, supervisors and other support personnel, with little or no real authority to affect change, even though they have the responsibilities to assure federal and state legal compliance. A consistent level of service is lacking across the BCPS when comparisons are made of similar programs between areas. What appears to be a commendable

practice within one area may not even exist in other areas of the system, and certainly not to the same degree. For example, the transition program at one high school maybe commendable and may hardly exist at another high school in another area of the system.

The administrative structure for special education is unique in that the program is administered centrally with several coordinators providing both program administrative duties within the regions and also having leadership responsibilities for curriculum, compliance and provision of programs in the least restrictive environment, (LRE). Coordinators for special education instruction, related services and LRE, must also carry assignments as Cluster Leaders for regions within the BCPS. These staff roles and responsibilities need to be revisited.

The BCPS reported employing 81.5 FTE psychologists, as well as utilizing grant funds for additional intern staff. This level of staffing would indicate that the ratio of psychologists to the total enrollment in the school system would be approximately 1330:1. Nationally, information on the number of psychologists employed is approximately 1750:1. Therefore, the BCPS has a higher number of psychologists employed than national averages. However, it should also be noted that the National Association of School Psychologists (NASP) recommends a ratio of 1000:1.

BCPS provides nursing services at a higher level than the national average. The BCPS reported employing a nurse for all 162 schools and more than one nurse at special schools. The total number of nurses reported was 167 nurses that would result in a ratio of nurses to total enrollment in the school system of approximately 650:1. The BCPS also employs health assistants, with the majority of the health assistants supported from the Third Party Billing revenue. Numbers vary dramatically across the nation with respect to nursing services at schools. A study that was completed in California identified the current staffing levels for school nurses to be approximately 1890:1. The National Association of School Nurses recommends a ratio of 750:1. It is clear, however, that the BCPS has implemented a priority in providing nursing services and exceeds national norms.

The BCPS also provides counselors and social workers throughout the schools. Information from the school system indicated that there are 275 FTE counselors serving the 162 school sites. In addition, there are 41.1 social workers who each serves an average of 45 cases. These services demonstrate a good focus on providing support services. The BCPS should be commended for the ability to maintain a highly qualified and competent staff of individuals in these areas.

With respect to other support personnel, it should be noted that the transition program of the BCPS is less than would be expected, with a few site specific exceptions. Transition personnel work very diligently at finding work experience for students with disabilities from age 14 and older. While the attitudes of these individuals is very positive and they

try very hard to provide students with meaningful transition activities, their case loads are very high, they do not have any assistance with job coaching and the efforts that are being made are based upon individual efforts and not based upon a planned process equally provided across the school system. While their efforts are extensive, the outcome for students is less than is expected by the transition section of IDEA. While most of the activities being provided are positive, little is done for onsite work experience with a skilled job coach. Most successful transition programs provide some level of job coaching for these students in transition from high school to adult life.

Conclusions and Recommendations; The BCPS is commended for providing a high level of staffing in the areas of support from school psychologists, school nurses, and counselors. The school system's special education administrative structure is currently poorly organized and leads to confusion of responsibilities across the school system for parents, staff and related agencies. Roles and responsibilities of key special education personnel should be revisited with regard to assignments. The current special education administrative structure is somewhat dysfunctional as BCPS level administrators have assignments that are too heavy to be carried out with the level of support required. The BCPS needs to reorganize the Office of Special Education in order to provide adequate content and conceptual assistance to schools and areas for both general and special education. Inservice activities need to be provided based upon the needs of students and parents and related to the general education instructional program as well as special education programs and services.

Specific recommendations are offered to restructure the Special Education Administration:

1. Align five special education Cluster Leaders to the five area Executive Directors of Schools to provide special education leadership support consistent with the manner in which general education is supported.
2. Remove cluster leader responsibilities from 3 of the 4 Coordinators at the central office level and assign the 3 to the Director of Special Education to work in coordination with the Executive Directors of Elementary and Secondary Education. Responsibilities for the Coordinators should include program improvement in the areas of instruction, including systemwide coordinated inservice for general and special education, LRE coordination including meaningful broad-based coordination of a full continuum of instructional settings and improved related services activities which are delivered in a fair and equitable manner across the school system.

Currently there are seven Cluster Leaders, and the proposed restructuring would create eight positions; five Cluster Leaders and three Coordinators. The result of the reorganization proposed above would be the addition of one position.

3. Continue to support proactive recruitment of high quality special education personnel by Human Resources.

2. Are the programs contracted with other providers cost effective for the BCPS and should the BCPS consider alternative delivery systems?

Meetings with school system personnel, parents and agencies across the system provided evidence that the practice of contracting for some services is not cost effective for the BCPS.

Each school year the BCPS staff attempts to project the number of special education personnel that will be required in the coming school year. When an unexpected situation arises, the staff still must provide services to identified special education students. When no placement option is available within the system, staff resolves this by contracting for services and placements with non-public schools. This is caused, in part, by special education staff not providing for unexpected program needs during the budgeting process. Since the delivery of services to students with disabilities is based upon rigid timelines and the assumption that staff will be qualified, unexpected vacancies or unexpected student growth creates a situation which requires the BCPS to respond with an appropriate placement for a given student or students. While this provides for a conservative approach and ensures that the system will not be overstaffed, it does not take into account the need for additional programs and classes throughout the school year based on staff turnover and growth within the student population. Consistent with this practice, the Department of Human Resources begins a recruitment program based upon the information received as to the number of staff that must be recruited. The BCPS has generally not recruited personnel based on realistic projected growth in the special education program. As a result, after the school year has begun and additional positions are needed, the school system is at a disadvantage in trying to recruit and fill open positions.

Nationally in the field of special education, there is a shortage of qualified special education professionals. In some fields, such as Speech and Language Specialists, there is an extreme shortage of personnel adequately trained to provide these required and mandated services. The issue for the BCPS is that if a student is identified as requiring a service or program and no school system staff is available, the service still must be provided. The solution the BCPS has used to meet this crisis is to provide the service by contract with a non-public school or agency, or contracted personnel because all the FTEs are allocated.

These non-public school or agency placements normally cost the school system a great deal more than the costs would be if the service was provided by a district employee. The same is true with respect to contract personnel. For example, in the field of speech

therapy the costs are in excess of two times as much for each student placed. More information on this issue is presented later in this report.

Conclusions and Recommendations: In some areas of special education, contracting for services has not been cost effective for the BCPS. The BCPS has generally staffed in accordance with an identified and current student population, not considering staff turnover trends and pupil population growth based on new and/or revised IEPs. Trend analysis should be completed in each area of special education services that the BCPS has significant contracts. The BCPS should consider revising their recruitment and staffing practices to anticipate staffing needs that have been shown through the analysis to be prudent, thereby reducing the need for contracting after the school year begins and saving funds.

3. Is the BCPS able to maintain compliance with state and federal requirements within the resources available?

This issue is concerned with the BCPS's special education program maintaining compliance with the mandates of the Federal Law, the IDEA, and the COMAR.

Reviews of materials, correspondence and interviews with district and site level personnel provided evidence that there is ongoing non-compliance. Parent input sessions provided evidence of many compliance related issues regarding educational needs of individual students. While this is a concern of the study, the issue that the study must address is if there is evidence of systemwide non-compliance. The due process established by the state has adequate measures for correction of non-compliance. The BCPS, within the past two years, has implemented its own audit process for dealing with non-compliance on a school-by-school basis. It should be noted that this audit process is exemplary, and the system is commended for the effectiveness and quality of the process.

Review of materials, records, correspondence and interviews with central office level and site level personnel provided evidence that there is some ongoing non-compliance with special education laws and regulations. Interviews with parents provided evidence of a number of concerns with LRE related issues, in particular, the inconsistent use of LRE/inclusive practices for students with disabilities. Clearly, issues related to LRE are paramount in what is occurring within the school system. This is also the area of major concern related to non-compliance.

For many years, the BCPS has followed a process by which some students with disabilities are grouped in programs away from their home school, which they would attend if they were not disabled. The IDEA requires that unless the child's IEP requires some other arrangement, the child is educated in the school that the he or she would

attend if non-disabled. (34 CFR § 300.552) The system has chosen to place some students in cluster programs as a convenience for the administration and not because students could not attend their home school. Issues such as lack of space are used to justify these more restrictive placements. This process is complicated by the apparent need for students to earn their way out of these settings in order to return to school with their non-disabled peers. In certain areas within the school system this is further complicated by large numbers of out of school system students being placed within the school system by agencies and judges. A review of the IEP form provides evidence that the form itself contributes to this by not requiring any justification for not being able to provide services in the home school. The BCPS must begin a process to discontinue this and move toward increasing the placement of these students in home school settings.

This issue will be addressed in detail further within this report. No evidence was found of the BCPS exceeding the requirements of IDEA or Maryland law and regulations. In addition, no evidence was found that resource availability was an issue with respect to maintaining compliance with state and federal requirements.

Conclusions and Recommendations: The BCPS has major issues of non-compliance with IDEA and COMAR in the area of LRE. The BCPS has developed a process by which students with disabilities are often grouped in programs within regions of the school system or clusters and are not generally accommodated within their home schools. The BCPS must recognize the compliance issues that this practice creates and begin immediately to revise this process. Specific plans need to be developed and efforts need to be expended to increase the placement of students with disabilities in their home school settings. Inservice training programs need to be developed and conducted with IEP teams to ensure their understanding of the law and implementation of the new direction.

4. Do programs operated within the BCPS exceed federal or state mandates and is the BCPS compliant with state and federal laws, in regard to IDEA 97 and regulations?

Interviews with parents, site personnel, central office personnel, review of records and materials provided evidence that the BCPS programs do not exceed federal or state mandates. The BCPS operates many programs which are compliant with both federal and state law and regulations. However, issues related to LRE, over representation of African American students in special education, and the failure to place foster youth in programs in a timely manner are indications that the BCPS special education program is not compliant with regard to the state and federal laws including IDEA 97 and Section 504 of the Rehabilitative Act of 1973.

During site visitation, the Consultants observed the use of “Crisis” rooms for time out for some students. The use of crisis rooms is a questionable practice and the effectiveness of such a practice is also questionable. The BCPS should review this practice and determine if it provides sound educational practice. It might be a better procedure to help schools develop efficient and effective schools which provide a more hospitable atmosphere for students.

The BCPS operates a school monitoring system, whereby complaints at given schools are audited by the Office of Special Education. This audit process, initiated in the past two years is exemplary and is commended for the quality and effectiveness of both the process and, recently, the number of schools which following an audit have voluntarily corrected non-compliance procedures and processes.

The issues related to LRE were noted previously and will be discussed in more detail further in this report. The issue related to over-representation of African American students in special education has been documented through communication with the Maryland State Department of Education. The October 31, 2003, pupil count for students in special education within BCPS shows that there were 1,567 African American female and 3,533 African American male students enrolled in special education out of 14,012 total students enrolled in special education. When compared with the total population of 108,792 students enrolled in BCPS, there were 19,584 African American females and 20,350 African American males enrolled.

African American females enrolled in special education represented 11.2% of the total special education population, while African American males enrolled in special education represented 25.2% of the population. This compares to African American females representing 18% and African American males 18.7% of the total BCPS population. It is interesting to note that if you look at ethnicity, without consideration of gender, the African-American population served within special education is consistent with the percentage of the total population. In other words, 36.4% of the African American population is served within special education and the African-American population represents 36.7% of the total population served within BCPS.

Clearly there is over representation of African American males in BCPS special education programs. This over representation is increased by a significant number of African American male students with existing IEPs moving into the BCPS as a result of a large number of foster home placements within the County.

It is important to understand that while the large number of foster home placements causes the percentage of African American males to be larger, it does not, however, reduce the requirement for the school system to work to reduce this over representation. It should also be noted that of all groups represented by ethnicity and gender, white males are the most over represented population in special education with 41% of the total special education population contrasted with a total district population of white

males of 29%. See the graph below for further clarification.

Special Education Students			Total BCPS Students		
By Ethnic/Gender Group			By Ethnic/Gender Group		
October 31, 2003			September 30, 2003		
Ethnic/Gender	Active IEP's Count		Ethnic/Gender	Total	
-----	=====		-----	-----	
AfAm F	1,567	11.18%	AfAm F	19,584	18.00%
AfAm M	3,533	25.21%	AfAm M	20,350	18.71%
Amln F	23	0.16%	Amln F	240	0.22%
Amln M	65	0.46%	Amln M	302	0.28%
Asn F	80	0.57%	Asn F	2,272	2.09%
Asn M	149	1.06%	Asn M	2,420	2.22%
Hsp F	76	0.54%	Hsp F	1,381	1.27%
Hsp M	171	1.22%	Hsp M	1,397	1.28%
Wht F	2,639	18.83%	Wht F	29,469	27.09%
Wht M	5,709	40.74%	Wht M	31,377	28.84%
	=====	=====		=====	=====
Count	14,012		Count	108,792	

The above data from the BCPS shows the actual count on specific count days and does not show variations with MSDE data which shows the actual numbers reduced by non-public school placements.

Conclusions and Recommendations: The special education program does not exceed federal and state laws and regulations. However, compliance issues with the federal and state law and regulations were noted in the following areas: Over representation of African American males in special education classes; and the use of cluster programs to provide services to children with disabilities in placements outside of the home school. The use of crisis rooms is a questionable practice and should be review by the BCPS to determine if this practice is sound or should be discontinued.

The BCPS special education office is commended on the quality of the audit unit and the effectiveness of the personnel in assisting the systems in maintaining compliance. The impact of the audit unit was demonstrated through a review of schools and interviews with staff. However, it is recommended that the Superintendent require the Executive

Directors of Schools to use information regarding violation of federal and state laws and regulations as part of the evaluation for site level administrators. It is also recommended that the site level administrative evaluation process include a behavior plan for correcting violations of special education laws and regulations.

5. Are appropriate steps taken to assure the Least Restrictive Environment for all students including the following:

5.1 Are environments at schools open and welcoming to students and parents?

5.2 Has the BCPS planned for appropriate space for special education classrooms, and related services and instructional services personnel space?

5.3 Are all special education program options age appropriate for the students being served?

5.4 Is the teaching staff appropriately certificated for the students being served?

5.5 Does the BCPS provide for maximum interaction between special education students and their non-disabled peers?

5.6 Do special education students matriculate with their non-disabled peers?

5.7 Does the BCPS provide for all students, including the disabled in their local neighborhood school?

To present a thorough discussion regarding the Least Restrictive Environment requirements, a presentation of the federal requirements is important to establish the context.

Individuals with Disabilities Education Act (IDEA):

Question 5 of the Special Education Program Review deals with the extent to which the BCPS is educating students with disabilities within the least restrictive environment (LRE). According to COMAR 13A.05.01.10A and the Individuals with Disabilities Education Act (IDEA) (34 CFR §300.550), each local education agency (LEA)/public agency shall ensure that:

- To the maximum extent appropriate, children with disabilities, including children in public or private institutions or other care facilities are educated with children who are non-disabled; and
- That special classes, separate schooling or other removal of children with disabilities from the regular educational environment occurs only if the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily.

In the provision of LRE, each LEA/public agency shall ensure that a continuum of alternative placements is available to meet the needs of children with disabilities for special education and related services, including instruction in regular classes, special classes, special schools, home instruction, and instruction in hospitals and institutions. (34 CFR §300.551)

In the determination of LRE programs and services for each child with a disability, including a preschool child with a disability, each school district/public agency shall ensure that the placement decision is made by an IEP Team (COMAR 13A.05I01.10C) composed of a group of persons knowledgeable about the child, reviewing the meaning of the evaluation data and various placement options. The child's placement must be determined at least annually, be based on the child's Individual Education Program (IEP), and be as close as possible to the child's home. Unless the IEP of a child with a disability requires some other arrangement, the child must be educated in the school that he or she would attend if non-disabled. In selecting LRE programs and services, consideration is given to any potential harmful effect on the child or on the quality of services that he or she needs. A child may not be removed from education in age-appropriate regular classrooms solely because of needed modifications in the general curriculum. (34 CFR §300.552)

Each IEP must contain a statement regarding how the child's disability affects the child's involvement and progress in the general curriculum (i.e., the same curriculum as for non-disabled children). Regardless of placement, all students must have access to the general education curriculum. Under COMAR 13A.05.01.10C(1)(e), the team must also consider transportation if not attending the home school. The IEP must also contain a statement of how the child will be educated and participate with other children with disabilities and nondisabled children. The IEP must also contain an explanation of the extent, if any, to which the child will not participate with nondisabled children in the regular class. (34 CFR §300.347)

Students with disabilities must participate in district and state assessments, with or without accommodations, or be provided an alternate assessment. The type of assessment must be contained within the child's IEP, along with needed accommodations and modifications. (34CFR 300.347)

Each LEA/public agency shall ensure that each child with a disability participates with nondisabled children in nonacademic and extracurricular services and activities, including meals, recess periods, and other nonacademic services defined in Section 300.306. (34 CFR §300.553)

IDEA has a strong preference for educating students with disabilities in classes with appropriate aids and supports. Each LEA/public agency shall make provisions for supplementary services (such as resource room or itinerant instruction) to be provided in conjunction with regular class placements. (34 CFR §300.551)

In carrying out its responsibility to place students in the LRE, the LEA must to the “maximum extent appropriately educate students with disabilities in the regular classroom with appropriate aids and supports, referred to as ‘supplementary aids and services,’ along with their nondisabled peers in the school they would attend if not disabled, unless a student’s IEP requires some other arrangement. Placement decisions shall not be based on the category of disabling condition, service delivery system, availability of space and services, curriculum content or methods, or administrative convenience. This requires an individualized inquiry into the unique educational needs of each disabled student in determining the possible range of aids and supports that are needed to facilitate the student’s placement in the regular educational environment before a more restrictive placement is considered.” (OSEP Memorandum – 95-9)

“In implementing IDEA’s LRE provisions, the regular classroom in the school the student would attend if not disabled is the first placement option considered for each disabled student before a more restrictive placement is considered. If the IEP of a student with a disability can be implemented satisfactorily with the provision of supplementary aids and services in the regular classroom in the school the student would attend if not disabled, that placement is the LRE placement for that student. However, if the student’s IEP cannot be implemented satisfactorily in that environment, even with the provision of supplementary aids and services, the regular classroom in the school the student would attend if not disabled is not the LRE placement for that student.” (OSEP Memorandum –95-9)

“Under IDEA, lack of adequate personnel or resources does not relieve school districts of their obligations to make FAPE (Free Appropriate Public Education) available to each disabled student in the least restrictive educational setting in which his or her IEP can be implemented. The public agency has an affirmative responsibility to ensure the supply of sufficient numbers of teachers who are qualified, with needed aids and services, to provide services to students with disabilities in regular educational environments and to provide necessary training and support services to students with disabilities. The Department encourages States and school districts to develop innovative approaches to address issues surrounding resource availability. Factors that

could be examined include cooperative learning, teaching styles, physical arrangements of the classroom, curriculum modifications, peer mediated supports, and equipment, to mention a few.” (OSEP Memorandum – 95-9)

School districts may not make placements based solely on factors such as category of disability, severity of disability, and configuration of delivery system. According to OSEP, however, “the following factors are relevant in determining if a placement is appropriate under IDEA:

- The educational benefits available to the disabled student in a traditional classroom, supplemented with appropriate aids and services, in comparison to the educational benefits to the disabled student from a special education classroom;
- The non-academic benefits to the disabled student from interacting with nondisabled students, and the degree of disruption of the education of other students, resulting in the inability to meet the unique needs of the disabled student.” (OSEP Memorandum – 95-9)

Each LEA must have on file with the SEA (State Education Agency) information to demonstrate that all personnel necessary to carry out the requirements of IDEA within the jurisdiction of the agency are appropriately and adequately prepared, consistent with the requirements of IDEA. (34 CFR §300.221)

No Child Left Behind (NCLB):

In addition to understanding IDEA, it is important to also put the issue of LRE within the context of the more recent federal legislation of No Child Left Behind. The overall aim of NCLB is to have all students performing at proficient levels in mathematics and reading by 2014 and to close the achievement gaps of students, including those with disabilities. If students with disabilities are to meet this goal, they must have meaningful access to the general education curriculum as well as remediation and intensive intervention. Consistent with NCLB requirements, students with disabilities must be educated by qualified general and special education personnel and be provided scientifically based instruction. Schools must meet adequate yearly progress (AYP), as defined by the state, of all students, including those with disabilities.

Both IDEA and NCLB emphasize the critical importance of parental involvement in the planning and implementation of programs and services for all students, including those with disabilities. Therefore, parents of students with disabilities must be meaningful partners in the educational process.

With the above LRE requirements of IDEA and the challenges of NCLB in mind, a number of Study activities were carried out in order to respond to Question 5 to determine the extent to which the BCPS is meeting the LRE requirements of IDEA. An exhaustive list of materials related to LRE were reviewed within the District and from the Maryland State Department of Education. This list of materials has been included within the Study Methodology presented earlier in this report. In addition, a number of focus groups and forums were held to discern staff and parent perceptions regarding LRE issues within the District. The following is a listing of the groups that met to discuss LRE strengths, issues, and challenges:

Type of Group	Date	Number of Participants
Focus Group – Resource Teachers	December 1, 2003	8
Parent Forum	December 1, 2003	32
Focus Group - Principals	November 4, 2003	8
Focus Group - Teachers	November 4, 2003	9
Focus Group – School Principals	November 4, 2003	8
School Psychologists	November 3, 2003.	7
Focus Group – Parents	November 3, 2003.	13
Focus Group – Parents	October 14, 2003	10
Focus Group – Middle and High School Teachers	October 14, 2003	6
Focus Group – Special Education Teachers	October 13, 2003	7
Focus Group – Elementary School IEP Chairs/Asst. Principals	October 13, 2003	8
Middle/High School Focus Group	October 13, 2003	7
Focus Group - School IEP and Special Education Department Chairs	October 13, 2003	7

Interviews and meetings were held with a variety of individuals to gather their input regarding the issue of LRE, including the following:

- Telephone meeting (March 24, 2004) with BCPS Office of Special Education staff to discuss the BCPS Special Education Staffing Plan, the LRE Improvement Plan, and other LRE issues.
- Meeting with Office of Special Education staff (December 2, 2003) to discuss LRE and other professional development procedures and activities in BCPS.
- Meeting with BCPS staff (December 1, 2003) to discuss counseling, social work, nursing, and psychological services.
- Meeting with related services team leaders: (December 1, 2003) to discuss related services provided for students with disabilities.
- Meeting with Office of Special Education Director (December 1, 2003) regarding issues and challenges related to LRE and follow-up issues from meeting with school psychologists, counselors, and social workers.
- Meeting with BCPS staff (November 4, 2003), early childhood coordinator to discuss issues/plans for infants and toddlers with disabilities/at risk conditions.
- Meeting with 10 Executive Directors of Schools and Assistants (November 4, 2003) to discuss general special education challenges as well as LRE strengths, issues, and challenges.
- Meeting with BCPS Staff - regarding their assignments and issues/ challenges related to LRE.
- Meeting with the coordinator of related services/cluster and leader/supervisor of non-public placements (November 3, 2003) regarding LRE issues in related services and decision-making regarding non-public school placements for students with disabilities.
- Meeting with the Deputy Superintendent for Curriculum and Instruction (November 3, 2003) regarding the status of the special education program review.
- Attended CACSE meeting (October 13, 2003) and heard information regarding the school audit process, budget issues, and the PBIS (positive behavior) initiative.
- Meeting with BCPS staff (October 13, 2003) to discuss extended school year, LRE, and other issues.
- Telephone meeting (October 2, 2003) with Executive Director of Federal and State Programs, the Director of the Office of Special Education, and two state department of education staff, regarding LRE issues in the State and in BCPS.

In addition to the above efforts, site visitations were conducted at the following schools to validate the information that had been gathered and reviewed previously:

- Chesapeake High School - December 1, 2003.
- Chatsworth – December 2, 2003.

- Deep Creek Middle School – December 2, 2003
- Pikesville High School – December 2, 2003
- Franklin Middle School – December 2, 2003
- Ridge Ruxton – November 5, 2003
- Maiden Choice – November 5, 2003

Findings

A summary of current LRE programs and services within the BCPS is provided below. Following this summary, LRE strengths, challenges, and recommendations are provided. Because of the nature of this policy research, strengths and challenges cited may not have quantitative findings; however, they do not represent isolated comments, statements, or anecdotes. Rather, they represent themes and findings that are consistent from the extensive feedback received from focus groups, interviews, and reviews of written materials.

Within BCPS, LRE is often referred to as inclusion or the continuum. For purposes of this report, these terms are used interchangeably.

Current LRE Programs and Services within the BCPS

Vision:

It is the vision of the BCPS that its graduates will have the knowledge, skills, and attitudes to reach their potential as responsible, productive citizens in a global economy and multi-cultural society.

Alignment with BCPS Blueprint for Progress

The *Blueprint for Progress* serves as the framework for the BCPS *Master Plan* and sets forth a number of performance goals and specific performance indicators for each goal.

The Master Plan is the vehicle for BCPS to focus its efforts and continue to assure equity and adequacy of resources by linking resources to student needs. The goals and indicators of the *Blueprint for Progress* are the concrete, measurable statements of the expectations for all students in the BCPS. Special education has a major part in Performance Goal 1.0 dealing with all students reaching high standards as evidenced by meeting or exceeding the Maryland School Assessment (MSA), including strategies for inclusion in the MSA and the ALT-MSA, full-day kindergartens, professional development in classroom accommodations to increase student achievement in the LRE, and a number of other curriculum and instruction efforts.

Performance Goal 3 requires that all students be taught by highly qualified teachers. This provides LRE challenges for special education teachers to be knowledgeable

about general education curriculum content areas so that students with disabilities are taught the curriculum being tested on the MSA. Goal 4 proposes a safe and orderly learning environment through activities such as positive discipline interventions. In addition, Performance Goal 5 of the *Blueprint for Progress* indicates that all high schools will meet the graduation rates established by the State. One of its performance indicators is that all students with disabilities will, in accordance with the objectives defined in the student's IEP, learn the body of knowledge presented in the general education environment to the maximum extent possible.

LRE Goals:

Following are LRE goals of the school system:

- To serve most students in their home school consistent with their IEPs.
- To have 80% of students with IEPs in the general education classes at least 60% of the school day.
- Provide a continuum of services at each home school in an effort to reduce the number of cluster programs.

Overall Status of LRE in BCPS

In a meeting with BCPS staff and representatives from the Maryland State Department of Education (MSDE) on October 2, 2003, the MSDE representatives indicated that although the BCPS is making progress and moving in a positive direction, it still ranks in the bottom quartile of school system jurisdictions in Maryland. Maryland, as a whole, has lowered its non-public school percentage. BCPS has reported 509 students within non-public school placements, as of October 31, 2003 which represents .47% of their total population, or 3.63% of their special education population. This figure is consistent with Montgomery County and a smaller percentage than reported by Baltimore City, according to their Staffing Plans. LRE data submitted by the 24 school system jurisdictions in Maryland to the MSDE showed that the BCPS has an overall LRE ranking of 21 of 24 systems.

In this telephone meeting with BCPS and MSDE representatives, several statements were made that formed some of the basic assumptions of the LRE inquiry.

Inclusion or LRE is not an earned status, but a required right under IDEA and Maryland COMAR,

- Special education is a service/support not a place. The schools and general education are responsible for all students, including those with disabilities. Special education provides the necessary supports and services to assist the schools in carrying out their responsibilities to educate students with disabilities.

- There needs to be a system-level message: Students with disabilities should be educated within their home schools. Students with disabilities do not leave the schools unless there are very unusual circumstances. In addition, students that have been placed out of the home school should be returned with proper supports.

Continuum of Services:

The BCPS provides a continuum of special education services ranging from consultative services and school-based support to self-contained classes in separate schools. According to the *Special Education Staffing Plan (Draft 3/17/04)* for 2004-05, following is a listing of the range of services and supports for students with disabilities.

- **Services for Infants and Toddlers** – The Baltimore County Infants and Toddlers Program, an interagency program among BCPS, Baltimore County Office of Health and Baltimore County Office of Social Services, provides services to children birth through 36 months of age who have or may have developmental disabilities, delays, or special health needs. Services, including special instruction, related therapies, and health services, are provided in “natural environments” such as the child’s home or a childcare setting. A dedicated service coordinator supports the family and ensures that services are provided as included on the child’s Individual Family Service Plan (IFSP).
- **Services for Preschool (Ages 3,4) and Kindergarten Students** – A continuum of services, including inclusion in general education preschool/kindergarten classes and self-contained classes are provided for these students three through five years of age with disabilities and/or developmental delays.
- **Inclusion for Diploma Bound Students (Grades 1-12)** – Inclusion services are provided by general education teachers, special education teachers, and/or instructional assistants working collaboratively to give support and related services to students with disabilities who are educated in the general education classroom for part or all of the day.
- **Resource Rooms for Diploma Bound Students (Grades 1-12)** – Resource room services are designed to provide support and related services to students with disabilities who are educated in their general education classroom for part or all of the day. Resource room services include a combination of inclusion and pullout services in the general education classroom and in small group instruction for intervention/acceleration and skill development, as needed.

- **Self-Contained Services for Diploma Bound Students (Grades 1-12)** – Self-contained services are provided for students with a wide variety of disabilities. These services may include behavioral supports and modified instruction and may be provided within comprehensive schools, or public, separate day schools.
- **Inclusion for Non-Diploma Bound Students (Grades 1-12)** - Inclusion services are provided by general education teachers, special education teachers, and/or instructional assistants working collaboratively to give support and related services to students with disabilities who are educated in the general education classroom for part or all of the day.
- **Resource Room for Non-Diploma Bound Students (Grades 1-12)** – Resource room services are designed to provide support and related services to students with disabilities who are educated in the general education classroom for part or all of the day—in many cases, within their home schools. Resource room services include a combination of inclusion and small group pullout instruction for intervention and skill development, as needed. Students working toward a certificate receive instruction on appropriate levels of Voluntary State Curriculum and life skills using the ALT-MSA.
- **Self-Contained Services for Non-Diploma Bound Students (Grades 1-12)** – These services are provided for students with a wide variety of disabilities and include behavioral supports, modified instruction, instruction in life skills, and functional academics. These life skills programs are provided in comprehensive schools, public, separate day schools, or on college campuses.
- **Crisis Intervention (Grades 1-12)** – Crisis intervention is allocated for each of the schools providing self-contained programs for students with emotional disturbance and related orders.
- **Public, Separate Day Schools, Special Area Staffing and Nurses (Grades 1-12)** – Special education positions are utilized to fund art, music, physical education, library, and school counseling.
- **Instructional Assistants for Non-Diploma Bound Students (Grades 1-12)** – Instructional assistants are assigned to schools giving considerations to unique student needs. At a minimum, an instructional assistant is assigned for each special education classroom teacher in the public, separate day schools, as well as for each self-contained classroom in a neighborhood school. A 0.5 instructional assistant is assigned to every 1.0 inclusion teacher in a neighborhood school.

- **Special Education Related Services** – Related services are provided for students with disabilities based on student needs with efforts to ensure consistency and equity of allocations to schools with similar profiles across the county. These related services include adaptive physical education, assistive technology, audiology, interpreters, occupational therapy, physical therapy, and speech language services.
- **Alternative Middle and High Schools** – Three settings provide services in supportive environments for students whose behavior or poor academic readiness is interfering with their ability to be successful in a regular school setting. Innovative curriculum, counseling, and social skills are an important part of this program.
- **Reading Intervention Model for Schools not Meeting AYP** – This support program is being implemented within elementary and middle schools for the 2004-05 school year that are not meeting AYP because of special education and other areas. This program is described below in *Summary of Strengths*.
- **Instructional Support Teams (ISTs)** – The ISTs were developed as part of a Consent Decree with the Office for Civil Rights regarding an issue of over-representation/disproportionality. The IST provides support for academic and behavior issues in which a plan is developed for support in the regular classroom.
- **Positive Behavior Support** – Consistent with Performance Goal 4 of the BCPS *Blueprint for Progress* dealing with safe and learning conducive environments, the *Positive Behavior Planning Guide* (2003) describes the following schoolwide positive behavior intervention programs to be implemented within the schools: Crisis Intervention Programs, Cooperative Discipline Program, Tools for Teaching Program, Positive Discipline Program, Stop and Think Program, Skill Streaming Program, Second Step Program, and Self-esteem and Life Skills Program. The Positive Behavior Intervention Support (PBIS) has been implemented within 26 schools, as of the 2003-04 school year.
- **Student Support Team (SST)** – As required by the COMAR, 13.A.05.05, every school within BCPS is expected to have an SST, which is designed to provide early and systematic assistance to students in their regular classroom environment, reducing or eliminating inappropriate referrals for testing, reduce unnecessary placements in special education, and increase the regular classroom teacher's capacity to deal with the more difficult-to-teach students.

- **Non-Public School Placements** – Students may be placed within approximately 40 state-approved non-public special education facilities, in which their special education is provided. During the 2003-2004 school year, 509 students with disabilities were placed as of November.

Summary of Strengths

Attitudes and Commitment

- The BCPS under the leadership of the Superintendent is committed to addressing pervasive and critical LRE needs within the school system. Leadership within the school system is fostering a shift in thinking from special education as a “place” to a concept of providing resources and services to support general education.
- Because of the significant and critical leadership and support to the schools that are needed in the area of LRE, the focus is on improving curriculum and instruction. This priority and commitment to improved instructional services for students with disabilities throughout the continuum is to be commended.
- There is excellent commitment toward interagency collaboration within the Infants and Toddlers Program.
- There are many pockets of LRE excellence within the schools throughout the County.
- The Superintendent has issued a recent Superintendent’s Bulletin regarding the BCPS commitments and priorities for LRE and inclusive school supports and services.
- Although uneven throughout the system, some of the Executive Directors of Schools and a number of school principals, other school administrators, teachers, and parents support LRE improvements within BCPS.

Improvements in LRE Supports and Service:

- The school system has developed a *LRE Improvement Plan* under the direction of the MSDE to proactively improve LRE services and supports throughout the system. This plan has the following two goals:
 1. 80% of students with disabilities receiving special education services will be instructed in general education classes at least 60% of the school day.

2. The number of students with disabilities receiving special education services outside their home school will decrease by 10% during the 2004-05 school year.
- The BCPS has received additional funding from the MSDE for an Inner School Partnership Grant. This project is in the second year. Eleven schools (3 secondary and 8 elementary) are participating in this effort to implement expanded LRE/inclusive school options. The participating schools have been piloting a recently-developed *Inclusion Handbook*. This *Handbook* will be disseminated to all schools by fall, 2004. It is technically good and contains many practical inclusive school suggestions and materials for both general and special education teachers.
 - Last year, 38 schools did not meet AYP. This and other factors have brought special and general education together in the central office and within the schools to identify strategies for LRE improvement.
 1. Consistent with the state requirement mandating a full-day kindergartens by 2007, the BCPS is adding 10 per year to achieve this goal. In the Superintendent's FY 05 budget request, 15 have been requested to funding authorities to provide an inclusion staff member to help meet the needs of students with disabilities within the kindergarten programs.
 2. The school system has recently required greater cooperation in choosing curriculum for general education, preschool and kindergarten. This program is designed to increase community options for children ages 3-5 and are working toward a birth to five community-based model which includes school and community programs.
 3. Another example of special education being integrated is the development of a three-tiered system. This three-tier program is being implemented using Dynamic Indicators of Basic Early Literacy (DIBBLES) at tier one to identify children in need or at risk. A second tier provides extra supplementary support, and a third tier provides more intensive support using Wilson's Foundations in K-1-2 programs and Fast Track in grades 3-5. This is an important LRE effort in that it places an emphasis upon prevention and early intervention of students with reading and other academic problems, rather than waiting until these students fail and are referred to special education and other special programs.
 - Keeping in mind the need for all students to meet AYP requirements of NCLB, a number of high school diploma bound students with disabilities have been placed in regular math and other content areas to assure access to the general

education curriculum/content that will be tested by the HSA and MSA. One concern that has been raised during the current year is students with disabilities that require self-contained math did not receive it. This has is a potential problem for the BCPS. In addition, high school special education teachers have been assigned to academic content areas for professional development and for curriculum development in order to improve the skills of teachers. The secondary education office has increased its efforts to observe special education teachers as well as general education teachers in order to provide additional assistance and feedback to special education teachers in the general education content areas. This is still another excellent example of increased integration between general and special education within the BCPS.

- There are a number of strong LRE/inclusive school programs and services within the schools throughout the system. Following are some examples:
 - ③ A new inclusive program has been initiated at Mars Estates in which students with disabilities go out to general education for social studies and science, and the special education teachers work within the general education classrooms to provide additional support to the students.
 - ③ Shady Spring Elementary School is primarily inclusively. General and special education teachers parallel teach students with disabilities.
 - ③ Stoneleigh Elementary has been an inclusive school for approximately 11 years with committed teachers who team teach and work collaboratively with all students.
 - ③ Riverview Elementary has a full continuum of services an effective and an effective IST.
 - ③ Pine Grove Middle School has a positive culture for diverse students with a committed staff.
 - ③ Chesapeake High School has a Peer Assistance Program. High school students are trained to work with students who have disabilities and get credit or community service credit. Students spend one hour a day in life skills/jobs. Other inclusive school practices at Chesapeake High School include co-teaching, crisis support, a point system for students functioning within general education classrooms, and PBIS. The school participates in the Inter-School Inclusion Project. Of the approximately 20 students who are emotionally disturbed (ED), six are in general education all day—none are in self-contained programs all day. There are no designated special education rooms—students move in and out. Everyone in the school appears to be coaching and helping with student and faculty relationships. A crisis intervention person works to alleviate concerns before they come to a crisis, working the buses and halls in the morning to spot students who may need to talk to someone. There is a preventative approach/culture in this school.

- ③ Lansdowne Elementary has an inclusive kindergarten, 2nd, 4th, and 5th. General education teachers are supportive. The building, however, is not fully accessible.
 - ③ Western School of Technology and Environmental Science has strong administrative support for inclusion.
 - ③ At Sandy Plains Elementary, there are two full-time staff connecting the school to other agencies such as Key Points and Johns Hopkins at Bayview. They have set up a model of crisis support with a full-time psychologist, Student Support Team, crisis intervention, and IST support. The school principal has been very supportive of this model providing money from the school budget to increase the psychologist's time for students with disabilities who have intense behavior needs.
 - ③ Battle Monument has a strong pre-school inclusion program.
 - ③ Despite the large numbers of students with ED at Chatsworth, there is a collaborative spirit among the general and special education teachers who team teach. The school has a transition room that helps students move from a self-contained program to that of inclusion.
 - ③ Deep Creek Middle School has expanded its inclusion/mainstreaming of students. Staff carry out mixed ability grouping and co-teaming across general and special education teachers. Their PBIS has met with success, with a 50% reduction in office referrals as well as reductions in students referred for special education.
 - ③ The Campfield Early Childhood Center uses team teaching to serve 15 children, of which 7 have disabilities.
- The elementary schools appear to be more inclusive and involve their special education teachers in inservice/professional development along with other teachers.
 - Appropriate LRE requires the need for adequate related services. There are some existing partnerships with outside entities (Villa Maria, Keyport, Bay Life) for school based mental health (involving approximately 30 schools). Six schools are involved in a partnership project with the Department of Social Services to provide mental health services to students and family members within the school setting. These schools include Deep Creek Elementary, Riverview Elementary, Lansdowne Middle School, Deep Creek Middle School, Chesapeake High School, and Lansdowne High School.
 - Currently, Positive Behavior Intervention and Supports (PBIS), patterned after the University of Oregon concepts, is being implemented within 26 BCPS schools.

- An excellent *Positive Behavior Planning Guide* has been developed to promote a safe schools pyramid, hierarchy of positive behavior planning, and many examples of practice strategies for implementing positive behavior planning.
- NW/SW IEP Team provides concentrated, integrated consultation and assessment services to students from out of county who are placed in foster care or group homes in the northwest and southwest areas and who exhibit educational disabilities requiring special education services. It is important that these students also have access to meaningful LRE programs.
- A Resource Center for Families and Schools has been developed. While it is located on the White Oak Center site, it provides information, training, and technical assistance for any parent of a student who has a disability across the BCPS. The Resource Center also serves as a resource to educators and coordinates with the PTA Special Education Liaison Project. The Resource Center maintains a lending library of articles, newsletters, books, and videotapes on a wide range of special education topics. The Resource Center also teams with educators to teach free workshops and facilitates a family-to-family support network. Parents expressed strong support of the services they receive from the Center such as assistance in preparing for IEP meetings. Parents also reported that they valued the information received from the special education newsletter, (*Hand in Hand*).
- BCPS maintains positive relationships with the Citizens Advisory Committee for Special Education, which is a Baltimore County parent advocacy group for special education. The Citizens Advisory Committee provides ongoing advice to the Office of Special Education, creates forums, testifies at hearings, and makes recommendations to the staff and school board on ways to improve programs and services for students in special education in BCPS.

LRE Staffing

- The BCPS maintains a high number of fully certified staff in special education. Consistent with the requirements of NCLB, the Office of Special Education is working with the appropriate general education offices to provide staff development for special education teachers in the major content areas. It should be noted that many staff and parents expressed concern that many teachers in special education classrooms were not fully qualified. Interviews with members of the Department of Human Resources provided evidence that the recruitment of fully certificated special education teachers and specialists was a high priority for the department. However, given a national shortage of special education personnel in general, the Personnel Department should continue to recruit qualified special education personnel,

- Consistent with requirements of the state, the school system has set goals, determined strategies and developed evaluation criteria for a staffing plan that is intended to achieve stated goals of programs and services for students with disabilities in their home schools and expanded services and support within general education classrooms and other LRE environments. The plan emphasizes opportunities for students in kindergarten, resource rooms at the elementary level, and behavioral services for students with emotional disturbances and other significant behavior concerns at the secondary level.
- The BCPS will consider moving approximately six ED programs to the home schools during the 2004-05 school year. Programs and staff are being shifted to provide home school placements for students with ED and autism.
- The school system is attempting to meet the challenges of NCLB to have all teachers highly qualified. Expanded professional development opportunities are also being provided for special education teachers to gain general education content knowledge.
- A 0.5 FTE IST teacher has been provided to the 19 schools that are implementing the IST process.
- The school system has several mentor teachers that travel throughout the school system to providing consultation for LRE and other needed support for new and non-tenured teachers.
- Over 45 crisis intervention staff have been hired to manage and de-escalate violent and disruptive behavior by students.
- A special education resource teacher has been assigned to the Professional Development Department to develop and implement training in differentiation of instruction and inclusive school practices. The resource teacher manages the Inner School LRE Partnership and will be utilizing the newly developed *Inclusion Handbook* for professional development within participating schools.

Organization and Accountability

- The Office of Special Education has initiated the practice of providing LRE data for school-based administrators with the expectation of the development and implementation of action plans and strategies for serving more students with disabilities in the general education classroom and home schools. On December 17, 2003, a mandatory training for assistant principals was held in which each

assistant principal received his or her school LRE data, list of out-of-home school students, and non-public school placements. This was an excellent effort. Other portions of this overall evaluation report deal with the need to improve the student information system so that such LRE data is provided to Executive Directors of Schools, principals and other administrators.

Summary of Challenges

Attitudes and Commitment

- Following are examples of pervasive attitudes within BCPS that have reinforced the placement of students with disabilities outside the general education classroom and outside the home schools, and that reflect the urgent need for change:
 - ③ Special education is viewed as a place to send students with disabilities and a “dumping ground.” Many special education teachers participating in focus groups indicated that they feel like a “stepchild” in the schools.
 - ③ Many programs have been designed for categories of students with disabilities.
 - ③ In some schools, there is a view that there are limited LRE opportunities for “unwanted guests.”
 - ③ “We put our most needy students with the least qualified teachers with no support, and then we put them on a bus for one hour in order to receive these services.”
 - ③ “I have never seen a self-contained classroom that did not fill up—if we build them, they will be filled.”
 - ③ “Often students are borderline—but we put them in special education to get assistance. Why do we have to label? We wait and label them to get rid of them.”
 - ③ “What are special schools doing that cannot be done in the home schools? We should not be busing students all over the County.”
 - ③ “Most of our schools are not prepared to accept ‘different children’, and don’t expect that they can.”
 - ③ “As a system, we should do much more before we label.”
 - ③ “Special education has become the black hole—we are grossly over-labeling, muddying the waters for students with real learning disabilities and emotional disturbance that truly need services.”
 - ③ “Some schools get pressure from principals to “get these kids out of the building.”
 - ③ There is a prevailing view of “our kids” vs. “your kids.” If a child has an IEP, there is a feeling that he/she belongs to special education.

- ③ There is a mindset that inclusive placements/services are provided on the basis of “space available.”
 - ③ “Crisis intervention on the IEP is a ticket to admission to special education.”
 - ③ There is inconsistency across the County regarding whether general education is thought of first in the consideration of placement/program options within the continuum. Many IEP teams start with more restrictive options.
 - ③ The current mindset within the County is toward specialized school programming and the disability of the child, rather than on school-based problem solving. This mindset is so pervasive that even cluster programs send students with disabilities to other cluster programs. There is a mindset of “child swapping.”
- Although there is a recent shift in thinking within the school system from viewing special education as being a place rather than a support to a concept of the provision of resources and services, interviews and focus groups had many participants that referred to inclusion as a program. Many of these individuals did not see inclusion as robust supports and services to students with disabilities within their home schools and in the general education classroom to the extent possible. The system must recognize this crucial shift of embracing all students regardless of their educational needs.
 - The school system must make a culture shift from believing that students can be served in schools other than the home school. Overuse of cluster programs will require rethinking how students can be best served in their home school with supports and resources provided by the school system. If students with disabilities are placed in cluster programs, the chances for meaningful inclusion with students who are not disabled are less likely to occur.
 - The commitment to inclusive school programs and supports for students with disabilities within home schools is not equally supported by all within the administrative structure. LRE changes of the magnitude that is needed within BPCS require a sense of urgency by all of those within the administrative structure.

Improvements in LRE Supports and Services

- As described below, the continuum of services within BCPS for students with disabilities is not clearly or consistently defined. *The Resource Guide for Parents and Guardians* defines a number of programs in a categorical manner (i.e., adapted, autism, deaf and hard of hearing, emotionally disturbed, functional, functional/ED, inclusion, life skills, special schools) as well as a

number of other services including adapted physical education, assistive technology, audiology, behavior resource teacher, crisis intervention services, extended year services, guidance and counseling services, health services, hearing itinerant services, instructional assistants, interpreters, occupational therapy, physical assistants, physical therapy, psychological services, pupil personnel services, reading specialist, school social workers, speech language pathology, special education teacher, transition services, transportation for students who need special assistance, and vision itinerant services.

The Special Education Teacher Handbook (2002) defines the continuum of services to include indirect services (consultation with all staff working with the student, as well as parents, monitoring of the student's program, performance and program; access to special materials, supplies, and special equipment, and vocational/career planning) and direct services (i.e., classroom instruction, speech/language therapy, vision/hearing, occupational therapy, and physical therapy). Within this *Handbook*, outreach programs are defined, which are provided for students who need special education services throughout their day.

These include adaptive programs, autism programs, programs for emotionally disturbed, functional programs, life skills programs, pre-school/kindergarten programs, and college-based outreach programs. A listing of in-school support is also described that includes the IEP team chairman, school nurse, counselor, crisis intervention teacher, speech/language pathologist, occupational therapist, physical therapist, instructional assistant, and personal assistant.

The *BCPS Special Education Staffing Plan* describes the variety or continuum of services for students with disabilities in terms of services to students, not as a place or program. These services include: services for infants and toddlers, services for preschool (ages 3,4) and kindergarten students, services for diploma bound students (grades 1-12), resource room services, self-contained classrooms, inclusion in the general education curriculum, and crisis intervention programs.

- Although there are staffing plans to reach LRE goals, an *LRE Improvement Plan*, and a Superintendent's Bulletin on LRE, there is a lack of a comprehensive plan to implement LRE services and supports for all students with disabilities that is clearly communicated to all. The message should also communicate a priority for returning students to their home school in a systematic manner.
- As stated earlier, the BCPS is initiating efforts to shift programs and resources and to add other resources to expand home school services for students with ED and autism. Because of the need to provide specialized services for these and other students with significant needs, there has been a lack of emphasis on resource support. Resource programs are an under-utilized option within the

LRE continuum of supports and services to general education. As a consequence, infants and toddlers successfully served in natural environments are going into self-contained programs because there aren't sufficient resource supports. Other students with mild and moderate disabilities are served in more restrictive programs because of the lack of resource services.

- Lack of space, resources, and the culture of the school system over the last decade are expressed as the primary barriers to programming within the home schools as well as general education classrooms. IDEA federal regulations and interpretations from the U.S. Department of Education, Office of Special Education Programs, clearly state that these administrative reasons cannot be a rationale to segregate students with disabilities.
- It is true that currently available space within the schools is an issue that is serving as a disincentive for provision of services in the LRE. For example, in some schools such as Patapsco High School, there is no place/space for related services personnel to work.
- In *An Organization Study for Baltimore County Public Schools* by MGT of America (April 24, 2001), it was stated that in the previous five years, the number of students with autism has increased 400 percent, students with attention deficit/hyperactivity disorder/other health impaired (ADHD) have increased 500 percent, and the number of students of emotional disturbance has doubled. Clearly there have been increases in these populations. There has also been significant growth in the numbers of students referred for costly non-public school placements. Mental health and related services are not adequate to serve these populations of students. Given the lack of school-based supports and a history of referring students to cluster programs, it could be anticipated that these students would be referred from home schools to cluster programs, and non-public school placements.
- Resources to support LRE programs and services within the home school and expanded support within general education classrooms are currently unevenly distributed and serve as a barrier to home school programming. For example, the schools with the cluster programs receive intensive supports. This seems logical given student needs; however, home schools must have the resources and incentives to provide home school services for the majority of students who have disabilities. Without these resources in all schools, the cycle of referring students out of the home schools is more difficult to stop. For example, in schools where there are inadequate crisis intervention, mental health, school psychologist time, counseling, and other supports to encourage school-based problem solving and provision of services for students with ED, autism, and other disabilities, the result will be continued placements out of the home school.

Schools without self-contained programs appear to have fewer resources to provide school-based services. In addition to the lack of intensive supports, there is a lack of in-classroom or small group pullout resource supports for students with mild and moderate disabilities.

- Even though it is acknowledged that there is a role for special schools, some of the special schools visited were very traditional in instructional methodology. Other than perhaps parental preferences and longevity in the school, a number of students were observed that did not appear to have severe needs and could function very well in their neighborhood home school given adequate supports.
- Although technically aligned with general education, the cluster programs have a functional curriculum for students who have mild, moderate, and severe retardation. Given the lack of inclusion opportunities, it is questionable whether there is meaningful access to the general curriculum. It is also not certain whether the special education teachers within the cluster programs have adequate content knowledge to align the functional curriculum with the general curriculum.
- Feedback from focus groups and other input sessions indicated that there is inconsistency throughout the school system regarding the use of guidelines for IEP chairs.
- Parents who are presented more inclusive options for their child within the IEP process are often not given a safety net or assurance that their child can return to a more restrictive option if the child fails in the inclusive option. As a result, parents often have fears and reluctance to move their child to a less restrictive setting with supplemental supports and services.
- There are diploma bound students and non-diploma bound students within BCPS. It is not clear whether students get tracked into the non-diploma option or how or when these decisions are made. There does not appear to be sufficient options for students within the BCPS.
- A number of special education teachers participating in focus groups indicated that they have not received consistent messages across the school system regarding the role of the IEP within NCLB. This is a national concern. There is confusion across the system regarding the role of the IEP within the overall context and priorities for academic achievement within NCLB. Teachers expressed concerns regarding inconsistent messages from school to school related to NCLB (i.e., whether or not, or how to modify assessments, how far these modifications can be made before going below grade level, and to what extent materials be used to supplement the general curriculum for students who

clearly are not mastering the content). Other NCLB concerns are the content requirements for special education personnel. Several teachers indicated concerns that general education teachers can teach students with disabilities without additional certification requirements; however, special education teachers may not teach special education students without additional content area requirements.

- General education teachers and others participating in focus groups expressed concern that there is a need for more training and ongoing support needed for general education teachers so that increased numbers of students with disabilities can be successfully educated in general education classrooms.
- Some schools have excessive numbers of students with emotional disturbance and autism. For example, Pikesville has approximately 79 students with ED of their total approximately 1,100 students. Chatsworth has 9 classes for students with ED. Students learn to model bad and/or inappropriate behavior when they are grouped in one school and are isolated within the school.
- As of November 2003, BCPS had placed and was supporting 509 students in non-public school placements, including about 20 students placed by the courts, RTC, and other public agencies. Placement determinations have been made at the school. The school must have the cluster level leader come in to assure that that the school has exhausted all of its options prior to referral for non-public school placement. It is necessary to have the home school present for the IEP meeting if the child is being transitioned back to the public school. It was the view of many teachers that students in non-public schools do not receive adequate access to the general curriculum, even though the vocational programs and intensity that can be offered with smaller numbers is positive.
- Transition services are an important component of a continuum of educational services for older students. A number of parents participating in focus groups reported the lack of meaningful transition services and the lack of follow-up in the transition planning for their child.
- The preschool programs within Baltimore County are non-categorical, even though some of them are within schools without age appropriate regular programs, thus limiting opportunities for participation between children with and without disabilities. There is a need for expanded partnerships within the schools, as well as with childcare and other community programs.
- Parents participating in focus groups indicated that communication with parents is an overall problem in a number of schools (over one third of those participating). Parents reported that telephone calls are not always returned,

case managers do not communicate well with parents, and they don't receive adequate information regarding the progress of their child.

LRE Staffing

- Insufficient psychologist time within the schools was a clear concern and theme of the focus group feedback. Psychologists would like to do a combination of assessment, consulting, and therapeutic intervention; however, the position is currently assessment driven, and it is difficult to provide other services given current caseloads. This perception appears to exist even though the data indicates that the school system is staffing the number of psychologists in excess of national norms.
- There appears to be a wide disparity regarding the availability of needed LRE positions within the public schools, when compared to that within nonpublic schools such as more therapeutic staff, social workers, IEP facilitators, school-based mental health services, and psychiatrists.
- Through interview feedback, it does not appear that crisis staff have any standards or qualifications, and most of them have had experience in a non-public facility. Therefore, there is a wide variety of approaches, background of experience and training. There doesn't appear to be a consistent approach or direction provided by a supervisor.

Organization and Accountability

- The BCPS has the responsibility to ensure that special education and related services are delivered to eligible students. However, the authority over those in the schools providing these services in BCPS lies with the Executive Directors of Schools and the school principals. Even though the Office of Special Education is sharing LRE data for school-based administrators in order to increase the numbers of students with disabilities served in home schools and in general education classrooms, there are no assurances or accountability that such action plans and strategies will be carried out. The Office of Special Education is dependent upon the Executive Directors of Schools and the school-based principals and other administrators to implement, manage, and make operational decisions related to LRE educational services for students with disabilities. Given the magnitude of LRE issues within the BCPS (i.e., its overall ranking of 21 out of 24 of the Maryland educational jurisdictions statewide), it is imperative that issues of authority and responsibility be sorted out and not be a barrier to the significant LRE changes that are needed.

- It is also unclear whether the Department of Professional Development can facilitate systemwide training/professional development such as in the area of LRE/inclusive school practices. There does not seem to be a systematic process to get this system wide training on a mandatory basis. This is problematic given the many inservice/professional development activities needed to make dramatic LRE changes.

LRE Recommendations

Attitudes and Commitment

- The school system should commit to carrying out the LRE requirements of IDEA and COMAR and communicate a sense of urgency and expectations that aggressive LRE/inclusive school goals will be systematically met over the next 3-5 years and that staff will be held accountable for these goals.
- Because the Executive Directors of Schools supervise and evaluate building principals, it is essential that their attitudes and leadership express to the schools the urgency of providing more inclusive programs throughout the school system. It is equally important that special education staff also express to the schools the urgency for inclusive school programs by providing support through the Executive Directors of Schools.
- The BCPS should shift to an attitude and mindset that special education is not a place to send students, but a set of supports and services to support students being educated in their home schools and in the general education classrooms, to the maximum extent possible. The BCPS should consider expanding the use of the term inclusion to include terms such as collaborative learning environments, LRE support services, and programs within a continuum of options.

Improvements in LRE Supports and Services:

- The school system needs a consistent plan and consistent LRE goals. There needs to be a sense of urgency to make LRE changes for students with disabilities and their families. The current LRE vision and goals are excellent, but a Comprehensive LRE Implementation Plan with a 3-5 year timeline needs to be developed and systematically implemented across the school system with the Department of Federal and State Programs and the Office of Special Education taking the lead. It is important that all staff take

responsibility and ownership in the development of this plan and commit to its full implementation, in conjunction with the special education staff, on a timely basis.

Based on the findings of this study, the following should be included within this overall Comprehensive LRE Plan:

1. Clearly stated LRE vision and goals, and a clearly defined full continuum of LRE services, supports, and placements.
2. Alignment with the *Blueprint for Progress*, the *BCPS Master Plan*, and NCLB with clearly stated roles and responsibilities of all staff.
3. Clearly defined timelines for implementing the plan.
4. Required school-based planning within the SIP to include proactive and aggressive strategies for change consistent with the overall Comprehensive LRE Plan.
5. Strong accountability for school-based change consistent with school plans.
6. Review of existing staffing and other resources to determine if they are used in the most efficient and equitable manner to support home school services.
7. Priority for discontinuing the practice of referring students with disabilities out of their home schools, unless for unique reasons that can be ameliorated over the 3-5 years as additional LRE supports and services can be implemented.
8. Sufficient staffing and other incentives for school administrators, with consideration of unique regional needs, to discontinue moving students with disabilities out of their home schools and to return students to their home schools in a systematic manner. Currently, the incentives are on more restrictive placements (i.e., cluster schools, schools with cluster programs, and self-contained programs receive more resources).
9. Priority for more use of resource programs (in-class support or part-time pullout for small groups) for students with mild and moderate disabilities. This will also help assure that infants and toddlers and preschool children will have more inclusive options, rather than more restrictive placements and programs.
10. Continued emphasis on LRE or inclusive school support for the increasing numbers of full-day kindergarten programs.
11. Prioritize the implementation of school-based positive behavior supports.
12. Reinforce the concept of collaboration between the classroom teacher and the special education staff member.
13. Enhance the staff development component of the inclusive classroom, so that students meet.
14. Training is needed for school principals, other school administrators, general and special education teachers, personal assistants, and other

staff on strategies for providing LRE supports, services, and programs. The good work already begun in the Inner School Inclusion Partnership Project and the *Inclusion Handbook* can be built on and expanded. Training will also be needed that provides specialized strategies for working with students who have autism and/or related syndromes.

15. Training is needed for IEP teams in the implementation of decision-making strategies for prioritizing LRE places, supports, and services.
 16. Recognition that effective LRE or inclusive school practices require time for general and special education teachers to plan. Thus, advance scheduling is a key ingredient for successful implementation.
 17. Assurances to parents that there will be a safety net in case their children are not successful in lesser restrictive programs, services, and supports.
 18. Expanded interagency linkages and partnerships for collaborative programming beginning with the Infant and Toddler Program, preschool, and school-age services. The positive work already begun with interagency school-based mental health and county wrap-around funds should be expanded. Focus on more fully integrating the Infant and Toddler Program within the BCPS LRE continuum of services, with an emphasis on assuring a smooth transition to preschool and school-age programs with LRE supports and services.
 19. Expansion of inclusive opportunities for young children 3-5 with disabilities or developmental delays, to include school and community options.
 20. Expansion of crisis support, social work services, psychological support, and counseling particularly within the high schools to better serve students with ED.
 21. Provision of better training, direction, and supervision of crisis staff so that there is more consistency in improving safety in the schools.
 22. Implementation of more effective uses of the special schools in the County (i.e., provide training, planning, and implementation of more innovative programs, utilize these schools as training and modeling resources to home schools, and implement more movement across the special and home schools to allow more opportunities for students with and without disabilities to communicate and be educated together)
 23. Review of current practices for determining whether students are diploma or non-diploma bound, with considerations for students “in the middle”.
 24. Consideration of additional career training for students with disabilities to help them transition from high school to the world of work.
- As the Comprehensive LRE Implementation Plan is being developed, the following priorities should be considered:
 1. Require school-based planning of expanded LRE options and implement strong accountability for carrying out school-based plans – See #4 and #5 above.

2. Emphasize prevention and early intervention.
3. Implement a policy of discontinuing the referral of students outside their home school (i.e., stem the current flow of referrals out of the schools.)
4. Provide sufficient staffing and incentives within the home schools to effectively serve their own students, including expanded crisis support, and interagency support.
5. Return students from non-public school placements by grade levels—beginning with elementary, then middle school, and finally high school.
6. Prioritize support for schools that have historically referred large numbers of students with disabilities to cluster programs, special public day schools, and non-public school placements, as well as schools that have unique circumstances such as Chatsworth and Pikesville High with large numbers of students with ED.

LRE Staffing

- Staffing needs will be informed and directed by the development of a Comprehensive LRE Implementation Plan as noted under *LRE Improvements*.
- In determining appropriate staffing needs within this Plan, the following should be considered:
 1. In prioritizing prevention and early intervention, staffing priorities should include expanding support for IST staff for additional schools and provide similar support for current and additional schools implementing PBIS.
 2. Expand inclusion staff at the kindergarten and school-age level so their caseloads can be reduced to approximately 12, depending on the unique needs of the students they serve.
 3. Prioritize staff providing resource support to help intervene early within the general education classroom and/or small group pullout programs and to prevent more serious disabilities and services provided in more restrictive settings/programs.
 4. Expand the numbers of crisis support personnel, particularly at the high school level, to support students with ED.
 5. Continue the support of mentors for beginning teachers who are inexperienced in implementing LRE supports. Expand mentoring support for more experienced general and special education teachers who are implementing co-teaching and other inclusive school options.

Organization and Accountability

- The responsibility for the implementation of a compliant system to serve all students is the responsibility of all staff members. Special education staff are

not responsible for a compliant system. Special education staff need to be seen as support for the general education program and the school system as a whole. The responsibility for a compliant system primarily relies upon the school staff at the school a child attends.

- Because of the significant numbers of students with disabilities who are not served within their home schools and who are served in more restricted environments, principals and other school administrators must be held accountable within their annual evaluations by the Executive Directors of Schools to continually review their LRE data, to develop home school plans within their overall SIP for improving services and support for students within the LRE, and to implement these plans consistent with the above stated goals.
- As stated in other sections of this overall Special Education program review, the special education data system must be substantially improved as an organizational priority so that LRE and other information needed for improving LRE supports and services can be provided to the schools on an ongoing basis, as well as the changes and improvements needed and made to better serve students with disabilities.
- Regardless of placement of students with disabilities, the principal and other school administrators within the home schools must be held accountable for the educational program and outcomes of all of their students. Consistent with this need, the MSA results for students with disabilities should be returned to the home school for review and action, as needed, to improve the results for these students.

Conclusions and Recommendations: Although there are a number of positive efforts that are currently being implemented to provide a more robust LRE continuum of supports, services, and programs throughout BCPS, this progress is insufficient to meet the urgency to more fully implement the LRE requirements of IDEA and COMAR. Given the fact that the BCPS ranks in the bottom quartile in school systems throughout Maryland relative to LRE is a strong indication of the pressing need for change. Clearly, the BCPS is not in full compliance with IDEA and COMAR.

There are other forces that compel proactive change by the BCPS. This past year, 27 out of 163 schools did not meet AYP because of special education. For another 32 schools, special education was among the reasons for not meeting AYP. Clearly, there is a need for general and special education to partner in the planning of bold changes to improve the achievement outcomes for students with disabilities. These changes must be consistent with federal and state LRE requirements.

Through a number of on- and off-site Study activities, extensive data and information has been gathered. This Report contains a summary of federal and state LRE requirements, a review of the methodology that was used to conduct study activities, and a snapshot of the current LRE programs and services within the BCPS. A summary of LRE strengths, challenges, and overall recommendations have been made. The BCPS is urged to build on many examples of innovative LRE efforts that have been initiated by the BCPS and carry out the following:

1. Work across special education, general education, and support services to develop and implement a Comprehensive LRE Implementation Plan that is aggressive and reflects a sense of urgency for more fully implementing the LRE requirements of IDEA and COMAR.
2. Provide staffing, resources, and incentives to support the implementation of a 3-5 year Comprehensive LRE Implementation Plan. Re-examine the use of existing resources to determine the level of efficiency, effectiveness, and fairness of their distribution and use.
3. Require Executive Directors of Schools, school principals, and other school administrators to develop and implement aggressive school-based LRE strategies within the SIPs to systematically move toward the vision, goals, and timelines of the BCPS Comprehensive LRE Implementation Plan.
4. Implement strong accountability for school administrators for the implementation of school-based LRE plans/strategies.

6. Are the professional development activities of the BCPS appropriate for the special education students being served with regard to the following?

6.1 Are professional development activities designed for all student needs,

6.2 Are professional development activities open to special education personnel and, if so, which special education personnel?

6.3 How does personnel determine what professional development activities will be provided each year?

6.4 What personnel are involved in determining professional development activities?

6.5 Are special education and general education parents involved in determining professional development activities?

6.6 Are federal and state funded comprehensive professional development monies spent in an appropriate manner?

Interviews with BCPS staff, including Professional Development staff provided evidence that professional development activities are designed to respond to requests from various departments and personnel within the school system. The traditional inservice model designed around a needs assessments did not appear to be used in designing inservice activities for the BCPS. Professional development activities do not appear to be based upon student needs, but rather on perceived areas of needed development. No evidence was found of a systemic approach to the development of inservice and professional activities. This approach leads to staff development that is reactive and more of a “shotgun” attempt to respond to all needs equally. Research in professional development is clear about how ineffective this type of approach is in changing staff behaviors.

Strong professional development is based on effective needs-assessment as well as a comprehensive follow up evaluation. No evidence of this was found in the school system. There is a need for long range, comprehensive, systemwide strategic planning for the continuing education of BCPS staff. Inadequate personnel training is extremely costly to the system. Poorly prepared staff, despite their best intentions, cannot fulfill their obligations and ultimately cost the school system valuable resources, not to mention its relationships with parents, the advocacy community, and regulatory agencies. These are minor losses, however, when compared to the forfeited educational experiences of students with disabilities and the missed opportunities of hardworking, but ill-prepared staff.

The school system would appear not to coordinate local school training activities. At the present time, the BCPS has no way to determine what its employees need to learn if they are to bring the school system back into compliance. The BCPS does not maintain a database for professional development. There is no systemwide assessment linked to the federal and state requirements for compliance. As a result, training topics do not always reflect the needs of those working directly with students.

Second, the BCPS has no way to determine who of its many employees needs additional training. There is no mechanism for tracking what skills and knowledge employees have demonstrated or failed to demonstrate.

Third, the BCPS has no way to determine how and when to provide training. The failure to evaluate systematically its prior training efforts leaves the system without a clear vision for future training. Because the BCPS does not have a long-range Professional Development Plan, needs-assessment, or database, training does not reflect ongoing learning, nor does it build on previous training. This leaves the school system unable to answer the questions of who, what, when and how.

The BCPS should develop an ongoing needs-assessment process to determine what skills and information personnel need across programs, including special education. This needs-assessment should be designed to produce data that can be readily retrieved, analyzed, summarized, and reported across school sites, clusters, and employee groups. The data can then be used to project future training needs. A comprehensive needs-assessment:

- Reveals strengths as well as areas for improvement,
- Reflects clear expected outcomes,
- Is research based, incorporating “best practices” including those applicable to students with culturally and linguistically diverse backgrounds,
- Recognizes that successful training must be relevant to the participants and that all participants have the same needs, and
- Provides for easy storage, retrieval, analysis, summary, and reporting of the responses of personnel whose needs are being assessed.

The long-range Professional Development Plan for the school system should also be outcome based with coaching methodologies in order to achieve any behavior change.

Professional development activities appear to be available to anyone desiring to attend training activities, including special education staff members. Additionally, staff appear to be welcome to attend professional development activities on a voluntary basis. However, for a long-range Professional Development Plan to be effective, it must address the needs of all staff and not simply depend upon the happenstance of participation by individual staff members.

Professional development personnel have requested assistance from parents in developing training programs. The BCPS has established a parent committee to advise the school system on staff and parent training needs. The current chair of the Citizens Advisory Committee for Special Education serves on this advisory committee for professional development. The BCPS is to be commended for the inclusion of parents in the process of determining needs.

The BCPS has established parent resource centers including the Resource Center for Families and Schools for parents of children with disabilities, which respond to parent requests for materials and information. These are primarily focused on responding to requests from parents of children with disabilities. In addition, the school system has established a vehicle that goes into the community with parent information and materials. This outreach that serves both general and special education is to be commended.

Professional development monies appear to be spent in keeping with state and federal requirements. However, again a comprehensive needs assessment from special education staff members would be helpful in determining the types of activities to be provided.

Conclusions and Recommendations: It is recommended that special education professional development activities be based upon a comprehensive needs assessment of general and special education personnel. The comprehensive, coordinated system of professional development to address legal and professional obligations to students with disabilities should be long-range, systemwide, and based on the common core knowledge and skills essential for those serving students with disabilities. In addition, the system must include an evaluation process to establish future training needs. Coordination between general and special education is critical to ensure successful implementation of the LRE components described earlier in this report. The implementation of NCLB also requires that professional development needs of the staff be addressed to ensure success of all students in meeting the proficiency levels required.

7. Has the BCPS established and implemented appropriate cost containment procedures with regard to special education programs?

Interviews were conducted with the following staff to gather information relative to cost containment procedures: The Executive Director, Federal and State Programs; the Executive Director, Fiscal Services; the Director Office of Budget and Reporting, the Fiscal Manager, Accounting; the Fiscal Analyst; the Position Analyst; and the Controller. A review was also conducted of selected financial data from 2000 through 2003, as well as financial audits conducted in recent years. Staffing Plans were reviewed for the Baltimore County Public Schools and the following school systems: Prince George's, Anne Arundel, Frederick, Howard, and Montgomery Counties and Baltimore City. The interviews conducted and the financial information reviewed provided evidence that the system has attempted to control the cost of special education while maintaining an appropriate program for students with disabilities. One example of the cost containment implemented by the school system has been the restriction of benefits for personal assistants and contracted staff.

Funding for special education is complex with revenue generated through local taxes, state funds, and federal sources, as well as specific state and federal grant funding. One of the concerns identified was the communication and coordination between fiscal services and special education staff. Traditionally, fiscal services and special education have not communicated effectively in order to ensure predictability in the budget process. This has caused the fiscal services operation to be surprised by staffing increases occurring late in the school year, thus resulting in costs that were not budgeted. In order to remedy this situation, it is important for a professional level position to be created within the Office of Special Education that would provide fiscal support to the office. Currently, the position is at a clerical level, which does not allow for communication among equals when working with the Department of Fiscal Services. It is critical that the special education office have internal, high level fiscal staff to provide for the integration of program issues with the fiscal perspective.

One example of the planning that could be achieved by better coordination between fiscal services and special education would be to examine the trends of staffing needs over the past few years. Interviews conducted with fiscal services and special education staff indicated that it has been common for special education to need additional personnel during the course of the year because of increased IEP driven needs. However, after the school year begins, it is extremely difficult to recruit qualified staff. As a result, the school system often contracts with private providers for staff positions at a much higher cost. Therefore, consideration should be given to requesting and staffing additional positions, particularly in the area of speech and language at the time that staff are available, in order to accommodate the anticipated IEP needs which have occurred historically. This would enable the BCPS to be prepared for staffing changes and to absorb these changes within the budget process resulting in savings overall for the school system. Trends should be reviewed from the past three years to determine the areas of staffing that should be considered for additional positions.

Planning between fiscal services and special education should also include contingency efforts. Maximizing resources between income sources should be a priority for both business and program divisions. Currently, each area of the special education budget operates to some degree in isolation, and the total perspective does not appear to be considered. For example, special education budget requests may be submitted without any consideration of the actual costs from the prior year, as well as the deficits and cost overruns in other areas of the budget that occurred in the past year. A trend analysis that looks at actual costs over a three year period and in all areas of the special education budget would be helpful in managing costs for the future.

As noted earlier, the special education budget is extremely complex. Funds are generated from a variety of sources. One of the challenges noted through the interviews conducted with staff was the practice of determining which special education positions would be funded through the operating budget and which positions would be funded through grants.

While a few staff in special education have knowledge of how to work within the budget process, others have very little understanding of the cost issues involved. In general, the special education management have not considered cost containment issues previously. In recent times, special education managers conduct a monthly review of budget and future projections. Cost containment is now part of the language that these managers understand and consciously consider in decision making. It is important that these concepts be communicated throughout the system, including IEP teams. Training should be available to IEP teams and Chairs, providing them with greater appreciation of the fiscal affects of their decisions. This does not imply that the finances should drive decisions on what is appropriate for individual students, but rather finances should affect considerations between two equally appropriate options being contemplated by the IEP teams.

Three examples of areas of training appear noteworthy. First, extended year costs have exceeded \$1.4 million, while only \$600,000 was budgeted. This resulted in the additional \$800,000 coming from the operating budget of the school system. Training for IEP Teams should stress the criteria for consideration of extended year, rather than routinely including the notation on IEPs. Another area of training that would be helpful for IEP Teams is in relation to personal assistants, since current training for these personnel is inadequate.

Personal assistants are often assigned as one-on-one aides for students that are fully included within general education programs. It is important to understand that supplementary aides and services are required to be provided in order to assist students to be successful in the general education environment. Therefore, this is an appropriate assignment of personal assistants to help in the transition of students with disabilities into the general education environment. However, it should generally not be an assignment that continues indefinitely. If students with disabilities are assigned an instructional assistant over a long period of time, what often occurs is that students in the general education class communicate with the instructional assistant rather than directly with the student, as if the student were invisible. It may also result in the student with a disability being treated as if he or she is not capable of functioning without a personal assistant. This may lead to greater reliance upon this person, thus limiting the student's ability to be fully integrated within the classroom dynamics. Clearly, this does not meet the goal of a least restrictive environment and often creates a more restrictive environment for the student than a special day class setting may provide. Therefore, it is critical that the assignment of personal assistants be monitored on an ongoing basis.

It is important that the BCPS implement a tracking system on the assignment of personal assistants. This will require a management information system with a high degree of reliability that is capable of timely reporting. In addition, BCPS may want to consider staffing some personal assistant positions on a "floater" basis, rather than assigning all personal assistant hours to specific staff. It is extremely difficult to reassign personal assistants when they have been assigned to a specific teacher and/or specialist. The certificated staff often build programs around the provision of the personal assistant hours and become dependent upon the continued provision of that time allocation. An initial understanding that personal assistants are only available on a limited time basis can often assist in preparing for the movement of staff in order to better meet students' needs while ensuring cost effectiveness of the services. This area of training for IEP Teams may also assist staff in understanding how their decisions affect the school system.

It may also be helpful for IEP Teams to be trained in understanding when related services are required. Special education teachers can often provide specialized instruction with adequate training. Therefore, related services should only be specified in the IEP when the special education teacher is not qualified to provide the service or it

is clearly not feasible.

As indicated in the discussions of Question 5 within this report, training in the area of LRE decision making is clearly needed for IEP teams, with an emphasis upon creative problem solving in the planning of home school services for students with disabilities.

In addition to training and professional development considerations, the school system should also consider simplifying the financial presentation of special education costs. Because of the different ways that funding is generated for special education, costs are not all reported in one area of the budget book. For example extended year costs for special education are not included within the special education budget. It is not easy for non-business staff to discern all funding allocated to special education and all of the cost centers for the special education program within the budget book. It would be helpful for a presentation of special education costs to be reorganized to present a comprehensive perspective of positions and costs in order to assist in the management of the program. In addition, this presentation could then serve as a baseline discussion for fiscal services and special education staff to meet quarterly, or at a minimum at the mid-year, to assess budget status, both from an income and expenditure basis and to determine anticipated needs for the balance of the year.

At the same time that the recommendation is set forth to present a simplified version of the special education budget, the system is to be commended for the outstanding documentation of fiscal procedures and financial information. The Staffing Plan and Budget Book are excellent resources, and the system has done a tremendous job of providing written procedures and processes.

Conclusions and Recommendations: The BCPS is to be commended for the outstanding documentation produced related to procedures and processes in the area of business services. The Staffing Plan developed by the school system is an excellent document. The school system is also be commended for addressing the needs for cost containment. However, to pursue any greater cost savings, it is recommended that the school system pursue stronger communication and coordination between fiscal services and special education. One recommendation to assist in this endeavor would be the creation of a position in the Office of Special Education that has responsibility to support the fiscal oversight of the budget. This position should be staffed at a professional level to ensure communication among equals in the linkage with the business office. Regular quarterly, or at a minimum mid-year reviews, should be conducted between fiscal services and special education staff to review budget figures and anticipate financial needs for the program prior to the end of the year. In addition, consideration should be given to the reorganization of the presentation of financial information in the area of special education to ensure that a comprehensive perspective of positions and costs is presented that is understandable for non-fiscal personnel.

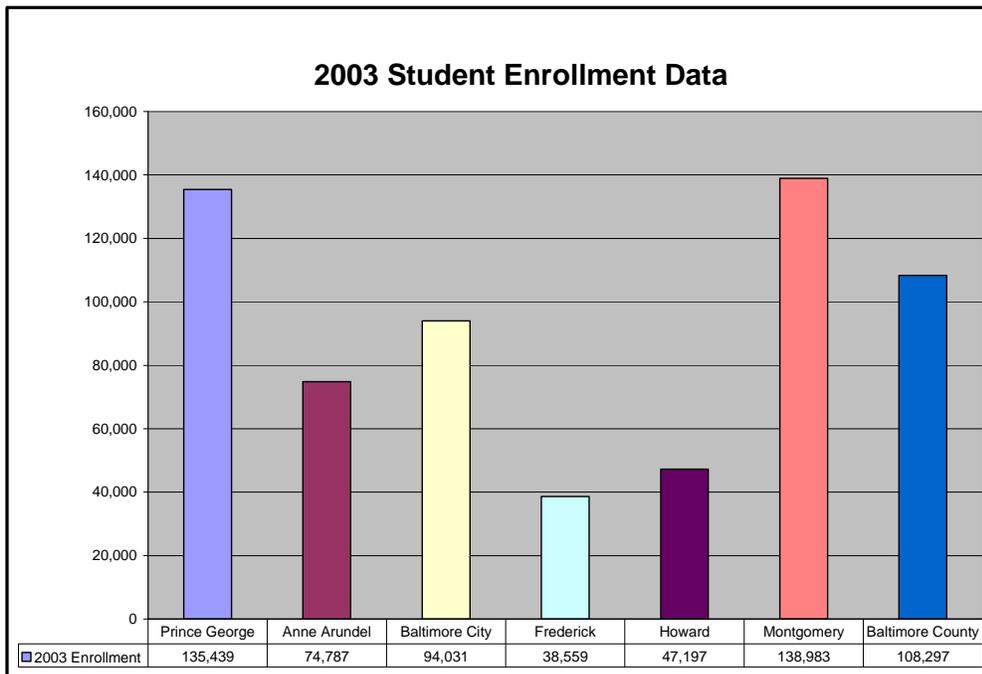
The BCPS should also review trends over the past few years to analyze staffing needs.

The school system should anticipate more realistic staffing based upon IEP needs and allocate positions on a proactive basis to avoid costly contracting of services. This however, requires a data system that is able to project growth in special education based upon IEP needs.

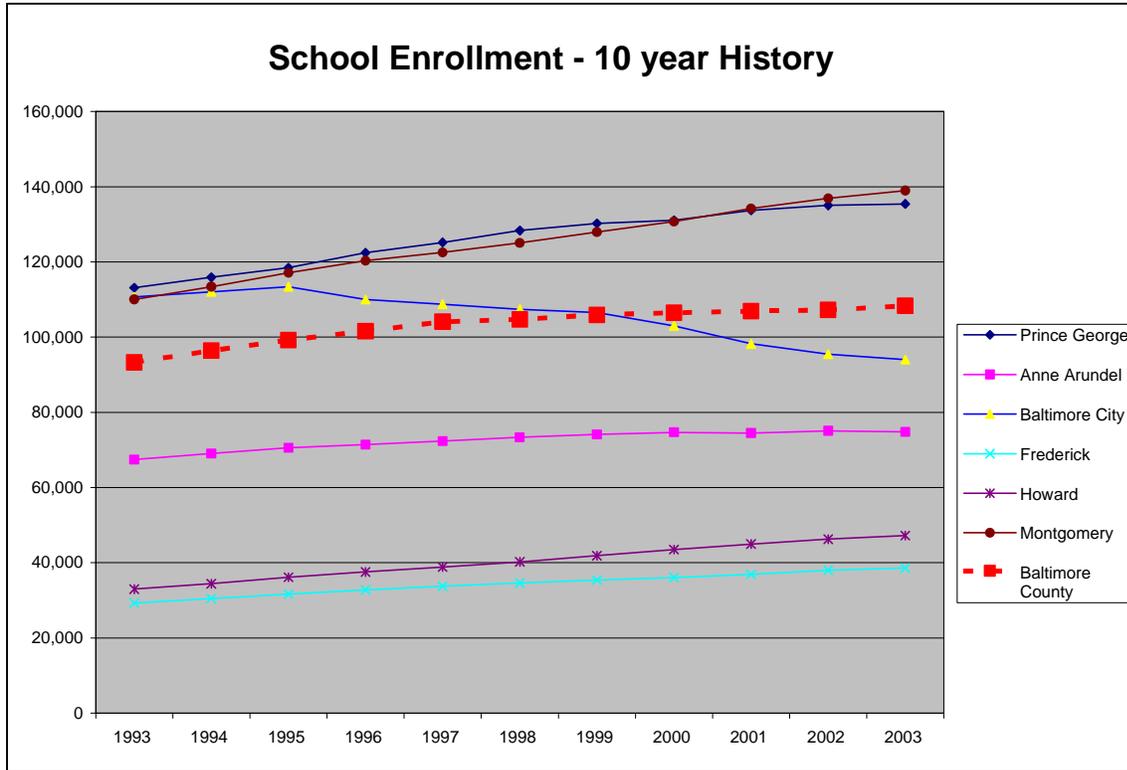
Training needs should be addressed through a comprehensive Professional Development Plan described in an earlier section of this report. Training areas should include professional development for IEP Teams regarding the fiscal implications of their decisions, related services criteria, and provisions for allocation of personnel assistants.

8. A review of the funding of the BCPS as it relates to the above issues will be made.

Baltimore County Public Schools serves approximately 108,000 students, based on 2003 enrollment figures. One of the ways to review the funding of the school system is to compare information from Baltimore County Public Schools to other school systems within Maryland. The following chart shows the enrollment of six other school systems within the state:

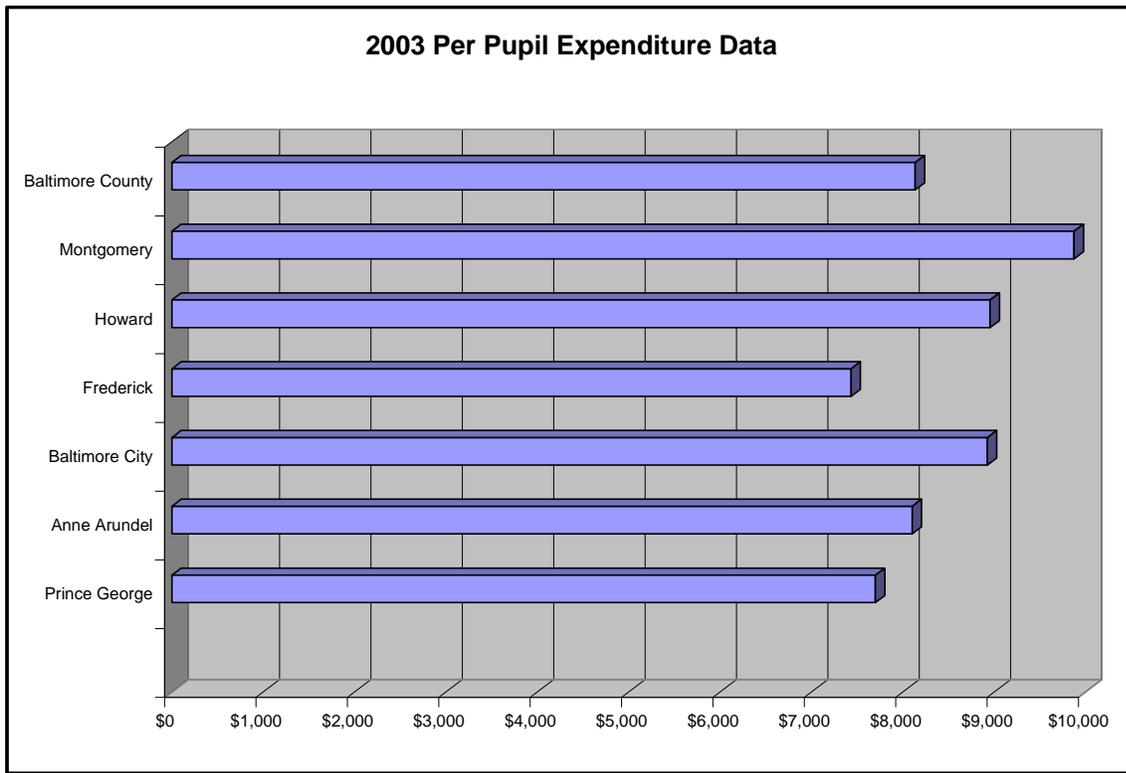


Prince George's and Montgomery County's serve more students than Baltimore County, while the other four school systems are smaller. The enrollment history of each school system is of interest as reflected on the following chart:



Only Baltimore City shows a declining trend over the 10-year history. All of the other school systems, including Baltimore County Public Schools show, a growth trend line. Montgomery has had the greatest growth, while Baltimore County Public Schools have appeared to plateau in recent years. Anne Arundel County has experienced only moderate growth during this time period.

Information related to expenditure information for the six school systems may also assist in reviewing the status of Baltimore County Public Schools. The following chart depicts the relative amounts that each district reported spending on a per pupil basis in 2003:



Montgomery County Public Schools clearly spends the highest amount on a per pupil basis, with \$9,876 per pupil. Howard County and Baltimore City spend very similar amounts, with \$8,957 and \$8,926 reported costs per pupil, respectively. Baltimore County Public Schools and Anne Arundel County are very close in their expenditure data, with \$8,138 and \$8,104 being reported for each school system. Prince George's reported costs of \$7,701 and Frederick County reported costs of \$7,436 per pupil. The gap is quite significant between the high and the low of the school systems, with a difference of over \$2,400 per pupil. Even the gap between Baltimore County Public Schools and Montgomery County is significant with a difference of over \$1,700 per pupil. The average of the seven school systems would be approximately \$8,448. However, if you excluded Montgomery from the calculation of the average, the figure would be approximately \$8,200, which is much closer to the information reported for Baltimore County Public Schools.

The expenditure data presented in the chart above represents the funds spent on public education in relation to the number of students enrolled in school. An expenditure is defined as money spent on: Administration, Instruction, Special Education, Student Personnel Services, Student Transportation, Health Services, Operations of the Physical Plant, Maintenance of the Physical Plant, Fixed Charges (including the State's share of teachers' retirement and social security). Expenditures for equipment, transfers and adult education are excluded from the calculation. The data are based on

the previous year's financial reports.

It is interesting to compare the expenditure information to the data reported on the wealth per pupil for each school system. The following chart reflects the information related to the wealth per pupil of each school system:

	Prince George's	Anne Arundel	Baltimore City	Frederick	Howard	Montgomery	Baltimore County
Wealth Per Pupil	\$215,163	\$342,502	\$153,264	\$248,598	\$346,556	\$446,334	\$321,289

The wealth per pupil information is in relation to the September 30 enrollment of the school system. Wealth is defined in the Code of Maryland Regulations, COMAR Section 5-202 as the sum of a county's net taxable income, the assessed value of real property, and fifty percent of the assessed value of personal property. The denominator used in the calculation is the September 30 equated enrollment of the school system.

There appears to be almost a direct relationship between the expenditure data per pupil and the wealth information for the school system on a per pupil basis. As expected, Montgomery posts the highest wealth figures, with the highest expenditure data presented earlier. Howard is the next highest on the wealth per pupil and the expenditure data on a per pupil basis corresponds to that position. The exception to the relationship between wealth and expenditure information per pupil is in Baltimore City. Baltimore City reflects the lowest wealth per pupil but has the third highest expenditure data for the school systems presented. Anne Arundel County's and Baltimore County Public Schools' wealth per pupil and expenditures per pupil appear very similar. Frederick and Prince George's report the next lowest figures, which correspond to their expenditure data per pupil.

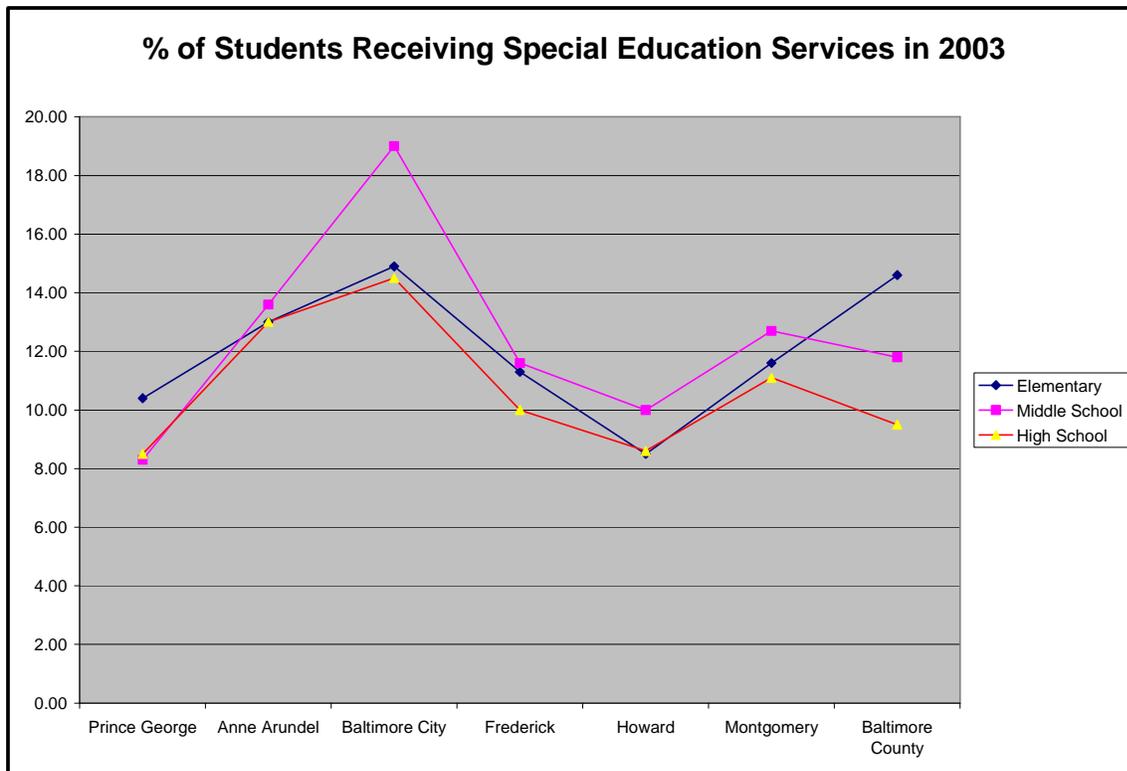
Other information available to compare and contrast the seven school systems is reflected on the following chart:

Other Data	Prince George	Anne Arundel	Baltimore City	Frederick	Howard	Montgomery	Baltimore County
Instructional Staff per 1,000 Pupils	63.1	62.7	69.2	65.4	70.6	66.8	67.8
Professional Staff per 1,000 Pupils	9.4	10.5	10.6	9.4	11.9	10.9	11.5
Instructional Assistants per 1,000	10.4	9.7	14.8	9.6	22.2	14.4	10.4
Average Length of School Day for Pupils	6.2 hours	6.3 hours	6.8 hours	6.6 hours	6.5 hours	6.5 hours	6.5 hours
Length of School Year for Pupils	178 days	178 days	178 days	178 days	178 days	164 days	177 days

Baltimore County Public Schools appears to be almost at the mid-point of the school system presented with respect to instructional staff employed. The BCPS is at the higher end of professional staff employed when compared to the other six school systems. A review of the instructional assistants per 1,000 pupils reflects that the school system is again at almost the mid-point of the data presented, particularly if

Howard County is excluded from the calculation in this area. Nothing significant is reflected in a review of the average length of school day or the length of school year with respect to Baltimore County Public Schools.

A review of the percentage of students served in special education programs for each of the school systems is presented in the next chart, which includes data by elementary, middle, and high school levels:

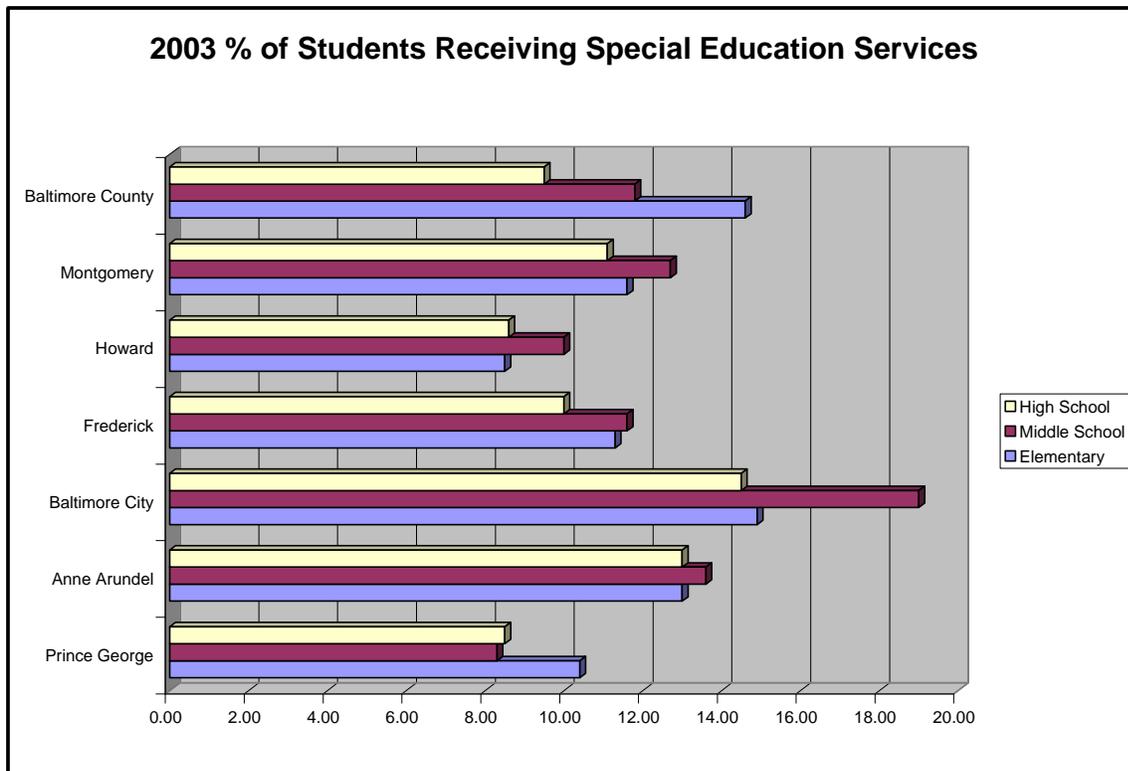


Baltimore County Public Schools reflects the anticipated profile, with the largest percentage of elementary students being served in special education programs and the high school students with the lowest percentage. Recognizing that speech and language services are a significant portion of special education services and further understanding that these services dramatically decrease as a student matures, it would be expected to see the high school population representing the lowest percentage of special education services. This is also true for the majority of the other school systems presented.

The middle school population would also generally be expected to be between the elementary and high school percentages. It is interesting that for five of the school systems, these are the grade levels that represent the highest percentage of service. The elementary grades are often the highest percentage of students being served in

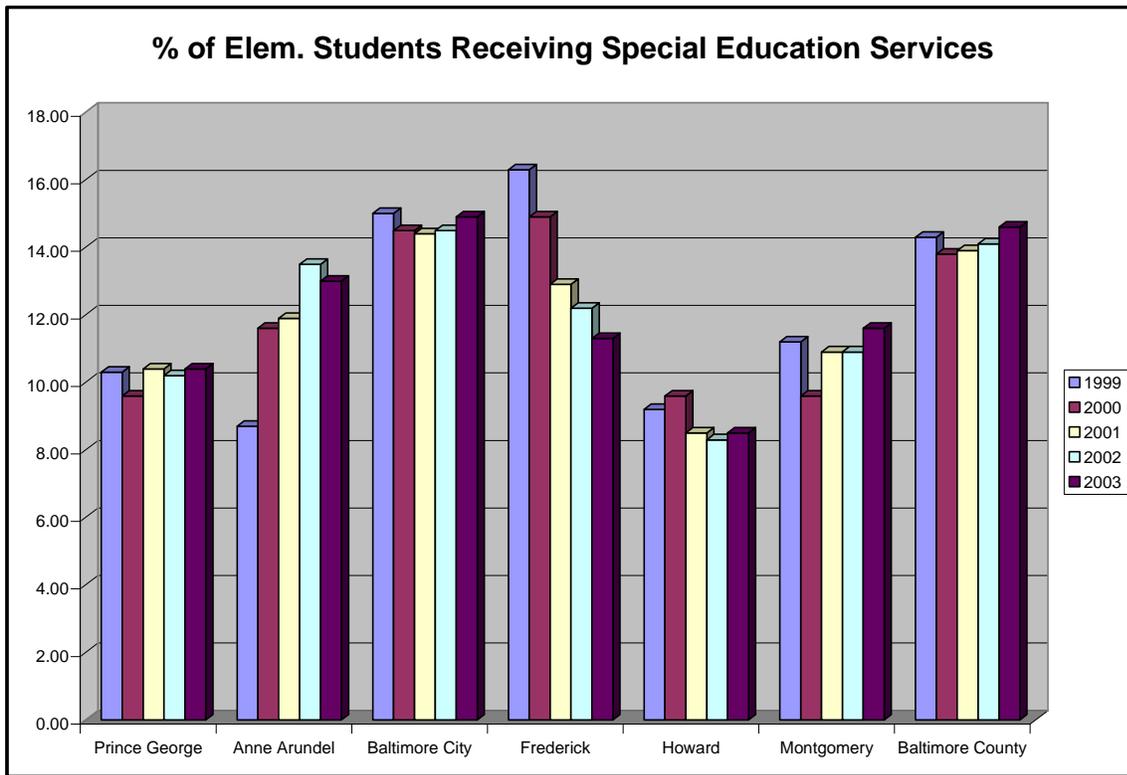
special education and reflect a priority on child find activities to ensure that all children requiring special education services are identified and served. This is true for the Baltimore County Public Schools as well as Prince George's County.

The following chart presents the same information, however, it is presented in a visual format that may make it easier to decipher the relative positions of the percentages being served by each school system and by grade level:



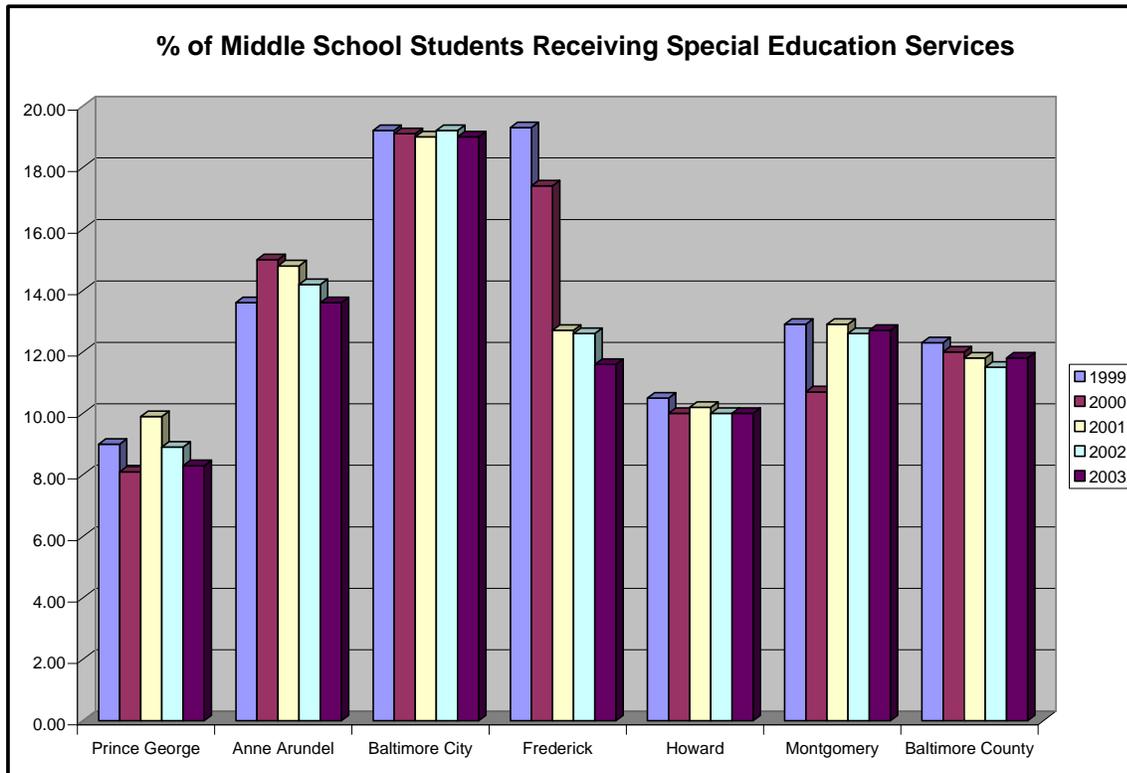
Another manner of analyzing the above information is to look at the percentage levels of service being identified. Generally, 10 to 12 percent of a school system's population would be identified for special education services. Howard and Prince George's would appear to be at the lower end of the spectrum for identification of students with disabilities, while Baltimore City is clearly at the highest end of the pendulum. Baltimore County Public Schools may want to examine the assessment batteries that are being used in the elementary schools to ensure that appropriate measures are being employed and that only students meeting eligibility criteria are being identified.

It may also be helpful to look at the identification of special education students on a percentage basis over a five-year history. The following chart reflects the percentage of elementary students identified for special education services by school system:



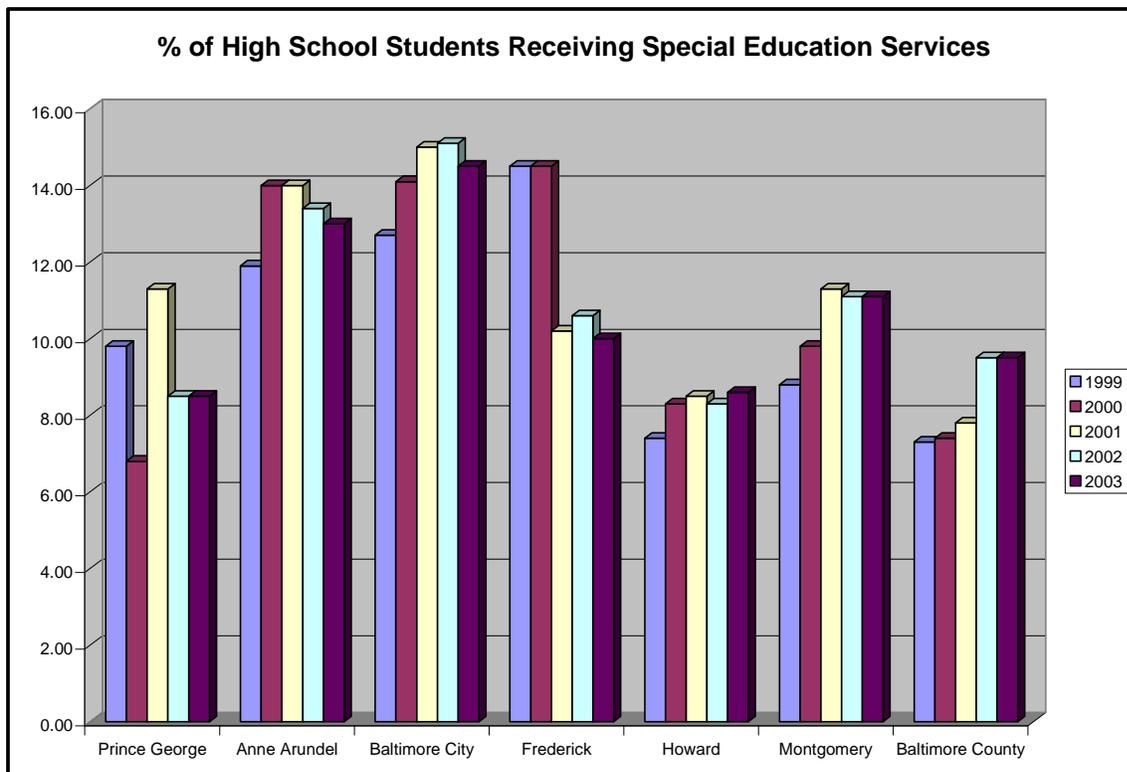
Baltimore County Public Schools shows a consistent pattern of approximately 14 percent being identified and served over the past five years. Only Baltimore City reflects similar statistics, while all other school systems reflect a lower percentage of elementary students being served in special education.

The following chart reflects the same information for middle school students:



Again the data for Baltimore County Public Schools appears relatively consistent, with some minor decline noted within the five-year history. It would appear that Frederick has undertaken a concerted effort to reduce identified students for special education services. Although a consistent pattern over the five years, Prince George's and Howard also appear to be implementing efforts to serve students with disabilities within general education, rather than placing them in special education. All other school systems appear generally consistent within the five-year period, with some ups and some downs reflected.

The next chart presents the information relative to high school students:



Baltimore County Public Schools shows an increase in the number of high school students identified and served within special education services over the past five years. Particularly the last two years have marked increases. However, the data still reflects overall percentages below 10% of the total population, which would appear to be appropriate.

The above information is presented only to provide a context for discussion and some general trends to review. It is difficult to draw final conclusions based on the information presented because of a variety of factors that can influence the percentages being posted for any school system. For example, school systems that provide a wide array of intervention programs may have lower special education percentages, because the options for modifications to the students' programs directly impact whether they are referred and found eligible for special education services. At the other end of the continuum, a school system that provides special education programs as the only alternative to assist their student population will generally have much higher percentages receiving special education services.

A review was also conducted of the class size ratios for Baltimore County Public Schools in relation to the other school systems. Staffing Plans were reviewed for each school system. The data indicated that Baltimore County Public Schools is generally within the same range of class size ratios as the other school systems within the state used for comparative purposes. Each school system uses its own nomenclature to describe programs and groups students in unique ways in accordance with its philosophy for provision of services. This makes it difficult to compare across districts and ensure that the comparisons are, in fact, “apples to apples.” The following chart presents the data derived from a review of the Staffing Plans and discussions with staff:

Self Contained Classes - Students per Teacher	Baltimore County	Prince George	Anne Arundel	Baltimore City	Frederick	Howard	Montgomery
Severely & Profoundly Disabled	7.5	6.5	8	7	7	6-7	6-9
Emotionally Disturbed	9	7	8	9	9	7	9-10
Special education - Preschool	9	9	8	10	9	12	
Autism	9	6	8	7	9		6
Life Skills	10	12	8	9	6-8	10	9
Functional, Adaptive Sp. Ed	13	12	10-12				13
Deaf/Hard of Hearing	9	7	8	9	7	7	7-15

The above chart reflects the general information presented by disability for the staffing ratios. It is important to add that each plan also noted that additional support and supplementary services would be available as appropriate. In addition, as mentioned earlier, there is not a one-to-one correspondence with the programs described. Life skills and functional and adaptive special education programs were not used as specific descriptors in the other school systems and, therefore, some extrapolation of data was necessary to determine the general class ratios. However, the data presented indicates that the Baltimore County Public Schools is generally consistent with other school systems in the State with respect to class ratios. It is also important to note that in some instances the descriptions of programs indicated that multiple disabilities would be served in a program. For example, Prince George’s included multiple disabilities in its Staffing Plan for the autism classroom category. A number of the school systems also categorized their staffing ratios based on the number of hours that special education is provided. For example, Anne Arundel indicated the following staffing ratios:

Hours of Special Education	Teacher to Student Ratio
Consultation	1:50 Students
.25 – 5.0	1:40 Students
5.25 – 15.0	1:20 Students
15.25 – 20.0	1:10 Students (Elementary)
	1:12 Students (Secondary)
20.25 – 31.25	1:9 Students (Regular Schools)
	1:8 Students (Special Centers)

Speech and language services appeared to be generally consistent across the school systems, with data ranging from approximately 40 to 60 on caseloads.

The other area that was reviewed with respect to special education services was the number of students served through non-public schools. Baltimore County Public Schools reported 509 students served in NPS settings in October, 2003. This represents approximately .47% of their enrollment being served in a NPS setting. A comparison to Montgomery County yields information that is very consistent. Montgomery reported serving 674 students in NPS within its Staffing Plan, which would equate to approximately .48% of its population being served in that placement option. Baltimore City reported in its Staffing Plan that they had 800 students in NPS settings, which would yield a percentage figure of approximately .85% of its population. This data would indicate that Baltimore County Public Schools is consistent or below other school systems in its placement of students in NPS programs.

Conclusions and Recommendations: Data presented indicates that the BCPS is generally in the norm of other school systems within the State in relation to percentage of students served, levels of service, per pupil expenditures, and non-public school placements. It is important to note, however, that the federal government has overall concerns regarding the LRE placements, supports, and services across the State of Maryland. The BCPS ranks in the bottom quartile when compared with other school systems within Maryland in LRE statistics.

9. Does the BCPS have an appropriate transportation system for the provision of services to children with disabilities and are travel times appropriate?

Two meetings with personnel from the Transportation Department were conducted to determine the appropriateness of the BCPS transportation system. Focus groups with school system personnel and parents provided input on this subject. Additionally, site personnel at schools were asked about the transportation needs of their students. Responses from school site staff indicated that students were generally transported in an effective manner.

However, some parents and some school personnel expressed concern for the behavior and communication skills of some of the bus drivers. Some special education personnel expressed concerns regarding scheduling transportation for community-based instruction activities. Additionally, Transition facilitators felt hampered in carrying out responsibilities in providing career experiences for their students. This was not a complaint with the transportation system, but rather frustration at not being able to transport their students in their own cars or in BCPS vans.

The travel times for many students enrolled in class away from their home school is not

appropriate. These students are required to attend classes within the area, rather than in their home school.

This issue should not be solved by adding busses, but by providing education for these students in their home schools. Transportation of a student with an IEP may be a related service based on eligibility under the provisions of IDEA '97' [34 CFR 300.24 (b) (15) and 34 CFR 300.306] and is determined by the IEP team when it is required for the student to benefit from special education. This related service is not utilized as a convenience and is operated as a requirement in order to carry out the IEP.

Operating a large transportation system for students with disabilities requires a staff which is trained to operate a compliant, nondiscriminatory system that is supportive of the least restrictive environment.

There is a need to provide a comprehensive staff development program for personnel regarding transportation policies and procedures. This inservice should include the following:

- Positive behavioral interventions and discipline procedures;
- Working with students who require special assistance, assistive devices and other medical equipment on the bus;
- Communicating effectively and professionally with parent, staff and administrators;
- Protecting the confidentiality of student information;
- Working as a member of a team with teachers, nurses, administrators and parents;
- Working with the specific health needs of students with physical disabilities; and
- Working with the medically fragile students on the bus.

Conclusions and Recommendations: The school system operates a large, efficient transportation system in a compliant manner. Costs of operating this system can be reduced by increased provision of educational services to special education students in home schools. There is a need to provide inservice activities for Transportation Department personnel. It is also necessary for the School System to find a way to improve the transportation of students with IEPs for community-based instruction.

10. What are the implications for the BCPS of the number of foster home children placed within the School System?

10.1 Is the BCPS impacted by these placements and to what degree?

10.2 Are children placed in group homes provided for in an appropriate manner?

10.3 Are some schools impacted in an inappropriate manner with regard

to their ability to provide compliant services to students with disabilities?
10.4 Are these students assessed and placed in a compliant and timely manner?

BCPS is significantly impacted by a large number of students placed in foster care facilities within the school system by a number of agencies. Newspaper accounts from the *Baltimore Sun* indicated that over a quarter of Maryland's group homes are located within Baltimore County according to state licensing records. While the financial impact of the students upon the school system has been recognized and attempts have been made to remedy this financial impact, little has been done to understand the impact on the receiving schools with regard to the impact on existing school personnel.

Frequently, these students reside in neighborhoods, that feed into schools that already have a higher level of transience than the school system in general. These students often move in and out of the foster home placements at a higher rate of transience than the schools' resident population. This causes school staff to provide services to more students in a reduced time frame, exasperating an existing shortage of key personnel at many schools. Added to this burden is the reality that these students are more likely to require a higher level of staff time and a greater need for immediate attention to the students' needs.

Interviews with staff, focus groups and a meeting with foster home providers, including one social worker from Baltimore City, provided evidence that the issues surrounding the placement of foster home students from outside the BCPS is having a significant impact on the system and will continue to expand and continue to be a drain on BCPS resources in the years ahead.

In order to understand this issue, one must first of all view the problems created for the school system by receiving students from outside the system in several dimensions.

Students placed by public agencies have a number of education issues inherent in being placed outside of their home. These issues are generally social and emotional. The impact of a large number of these students acts as a drain on school personnel resources. One middle school assistant principal with a large number of foster home students in her school estimated that these students (approximately 20) consumed 85 percent of her time, leaving only 15 percent of her time for other students in the school. Additionally, any reimbursement of costs is based upon a slot or unit of a child, but realistically most of these students do not represent only one student. They may represent two or three different students over the course of one school year. For example, a foster home placed child entering the system may only be enrolled for a few weeks and then may move from his or her current placement, only to be replaced by another foster home placed child requiring many of the services which had been provided to the previous child. While this appears to be one child with a set of

corresponding support services provided by the school, in reality it is, for purposes of time the school system expends, like providing services to two children, not one child. For accounting purposes, it is one child; but from a standpoint of employee costs, it is more than one child.

Since a number of these students will have disabilities, they require increased assessment and staff time, which reduces the time these service providers have for other students within the school.

More often than not, these students come to the school with no documentation of previous educational experiences. Cumulative records are not provided by the social worker or the foster care personnel enrolling the student. Requests by receiving school personnel for cumulative records, including the IEP and other special education data, are not readily available.

Foster care providers express frustration with a system that cannot readily meet the needs of the students. BCPS personnel indicated that they frequently had to wait weeks to receive this needed student information. In the meantime, school staff place students as best they can. It should be noted that other states have attempted to resolve this issue by legislation requiring a reasonably rapid response to requests for student personnel information, including the cumulative file. California, for example, has legislation requiring schools to mail requested student personnel data within five days of receipt of the request for the student's records.

The high number of students placed by agencies within the school system also impacts personnel by having either to notify and involve the students' parents in the special education process (many of the parents live a great deal of distance from the school of attendance) or to provide representation of the student by a surrogate parent. This whole issue of providing for a trained responsible adult to act as a surrogate parent is not easily accomplished and further impacts school personnel time.

The school system has provided a team of trained special educational specialists to provide for the large number of these students in two of its geographic areas. This team has greatly facilitated the proper placement of the students in appropriate school settings. However, it must be recognized that this practice has a high cost for the school system.

As indicated earlier in this report, there is no indication that this practice of placing foster home youth in the BCPS will be discontinued or reduced. Every indication is that the practice will continue and will increase in the years ahead. The BCPS will have to find solutions to this ever increasing problem in several ways, including seeking legislation which provides increased and disproportional funding to offset some of the high personnel costs of this practice. The BCPS should also draft legislation for support from the legislature for a timely transfer of student personnel records.

Although very costly, the BCPS should replicate the team configuration that currently is serving two regions of the school system for placement assistance in appropriate schools and programs for these foster home students.

Conclusions and Recommendations: The BCPS is significantly impacted by the large number of students placed in Baltimore County Public Schools by public agencies. This impact is felt as a hardship on the students being placed, by the foster care providers and by individual school site personnel. Some schools are highly impacted by the process as placement in foster care facilities tends to be grouped in certain sections of the school system. The effect of this impactation requires personnel at these schools to spend large amounts of time on these students, thereby reducing staff time for other students within the school.

It is recommended that the BCPS personnel work with the State Legislature to increase funding for the school system as a highly impacted school district and to pass legislation that requires school systems to send student personnel files upon request in a timely manner. In the meantime, a strong interagency agreement initiated by the BCPS is needed to remedy this critical problem.

11. Other Findings

The following is a listing of areas that were discovered through the course of the study, but were not specifically questioned within the scope of this study:

There appears to be wide disparity in how special education support has been distributed throughout the school system. Some schools appeared to have adequate materials and supplies, while other schools did not appear to have a reasonable amount of the supplies and materials necessary to operate the school. In addition, there were differences between schools in the number of special education support staff assigned. Part of this may be due to the inability to fill positions within certain schools.

Although the school environment at many schools was clean, neat and inviting, several schools within the system exhibited an environment that was not welcoming. One example of this issue was a school where the special education classrooms were in the basement; the walls had holes that had not been repaired, and a broken window covered with plywood. The difference in maintenance of schools appeared to be related to the socio-economic status of the community.

The differences in school facilities were also observed in instructional staff. While many schools exhibited outstanding instructional personnel doing very meaningful, creative instruction, other schools were observed to have unqualified staff providing instruction that did not appear to engage students, nor did it appear to be standards-

based. Although all professions will have good, better, and best practitioners, the concern was that there appeared to be a relationship between qualified staff and the socio-economic status of the community where the school was located.

V. COMMENDATIONS

1. The Board of Education and the Superintendent are commended for undertaking this study.
2. The Board of Education is commended for its strong continuing support of special education programs and services.
3. The BCPS is commended for development and maintenance of its Citizens Advisory committee for Special Education.
4. The BCPS is commended for the outstanding documentation produced related to procedures and processes in the area of fiscal services.
5. The BCPS is commended for its high quality Infants and Toddlers program.
6. The BCPS is commended for the development of an excellent Staffing Plan, which details the programs to be provided by the school system.
7. The BCPS is commended for addressing the needs for cost containment, to instill in program managers the need to consider costs and to understand the fiscal implications of decision making.
8. The BCPS is commended for the pockets of excellence in LRE within some of the schools across the school system.
9. The BCPS is commended for placing a priority on support services in the areas of school psychologists, school nurses, counselors, and social workers.
10. The BCPS is commended for the efforts of the Northwest/Southwest IEP Team in placing foster care students in appropriate placements in a reasonable time frame through individuals case management.
11. The BCPS is commended for the development, implementation and maintenance of a high quality school audit procedure for special education.
12. The Citizens Advisory Committee is commended for efforts made to expand the role of parents in an advisory capacity to the Board of Education.
13. The Office of Special Education is commended for the high quality of BCPS handbooks and other materials.
14. The Parent Facilitators are commended for development and maintenance of a high quality parent resource center.

15. Lansdowne High School is commended for a quality collaborative Algebra class.
16. Dulaney High School is commended for a quality collaborative English 12 class.
17. The Administrative of Maiden Choice School is commended for implementing Project Move on behalf of the children receiving instruction in the project.
18. Battle Monument School is commended for implementing a high level community transition program for students.
19. The Speech and Language office is commended for developing recruitment and maintenance of quality complaint programs by flexible scheduling of staff time.

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VI. RECOMMENDATIONS

This chapter contains a summary of recommendations resulting from the study.

1. It is recommended that the Special Education be reorganized by aligning the five regional Cluster Leaders with the Executive Directors of Schools to provide special education leadership support.
2. It is recommended that the Special Education Coordinators assume responsibility for program improvement in the areas of instruction. This includes system wide coordinated in-service for both general and special education, LRE coordination including meaningful broad based coordination of a full continuum of instructional settings, and improved related services activities that are delivered by area in a fair and equitable manner across the system.
3. It is recommended that the BCPS continue to support proactive recruitment of high quality special education personnel by the Department of Human Resources and expand the support of new special and general education teachers by mentor teachers.
4. It is recommended that the Office of Special Education implement a trend analysis in those areas where the system relies heavily on special education providers from the non-public and private sector in order implement compliant IEPs for some students. Based on the trend analysis, the BCPS should consider revising its recruitment and staffing practices to anticipate staffing needs that have been shown through the analysis to be prudent, thereby reducing the need for contracting after the school year begins and saving the school system funds.
5. It is recommended that the BCPS begin immediately to reduce the practice of placing students with IEPs outside their home schools and to develop and implement a Comprehensive LRE Plan, including a short- and long-range plan to accommodate students at their home schools whenever possible.
6. It is recommended that the BCPS implement a plan for training IEP Teams to ensure their understanding of the law and implementation of the new direction for serving students in their home school.
7. It is recommended that the Office of Special Education's Audit Unit be maintained and expanded and that the Superintendent require the Executive Directors of Schools to use information regarding violation of federal and state laws and regulations as part of the evaluation for site level administrators.
8. It is recommended that the site level evaluations of administrators include a specific implementation plan for correcting violations of special education laws and regulations.

9. It is recommended that the BCPS recommit to carrying out LRE requirements of IDEA and COMAR and communicate to all personnel a sense of urgency and expectation that aggressive LRE/inclusive school goals will be systematically met over the next 3-5 years and that staff will be held accountable for these goals.

10. It is recommended that the Board of Education, Superintendent, and all staff express the urgency of providing more inclusive school programs throughout the school system, and that accountability for implementing LRE be included within evaluation procedures of school principals and other school administrators.

11. It is recommended that the term “Inclusion” be discontinued as part of the School System’s vocabulary because of the prevailing mindset that inclusion is a “place” in general education. It can be replaced with terms like “Inclusive education,” “collaborative learning environments,” or “LRE supports, services and programs within a continuum of options.”

12. It is recommended that the Comprehensive LRE Plan include the following:

- A. Clearly stated LRE vision and goals, and a clearly defined full continuum of LRE services, supports, and placements.
- B. Alignment with the *Blueprint for Progress*, and the *BCPS Master Plan*, and with NCLB with clearly stated roles and responsibilities of special education.
- C. Clearly-defined timelines for change (i.e., reaching LRE goals) within 3-5 years.
- D. Required school-based planning within the SIP to include proactive and aggressive strategies for change consistent with the overall Comprehensive LRE Plan.
- E. Strong accountability for school-based change consistent with school plans.
- F. Review of existing staffing and other resources to determine if they are used in the most efficient and equitable manner to support home school services.
- G. Priority for discontinuing the practice of referring students with disabilities out of their home schools, unless for unique reasons that can be ameliorated over the 3-5 years as additional LRE supports and services can be implemented.
- H. Pursue discussions with the MSDE to determine if any special circumstances can be implemented, given the BCPS LRE standing in Maryland, to have some of the state support of non-public school placements follow students back to their home schools—perhaps on a one-time or time-limited basis to cover initial start-up costs that can be gradually built into the BCPS school budget.
- I. Sufficient staffing and other incentives for school administrators, with consideration of unique needs, to discontinue moving students with disabilities out of their home schools and to bring students back to their home schools in a systematic manner. Currently, the incentives are on more restrictive placements (i.e., cluster schools,

schools with cluster programs, and self-contained programs receive more resources).

- J. Priority for more use of resource programs (in-class support or part-time pullout for small groups) for students with mild and moderate disabilities. This will also help assure that infants and toddlers and preschool children will have more inclusive options, rather than more restrictive placements and programs.
- K. Continued emphasis on LRE or inclusive school support for the increasing numbers of full-day kindergarten programs.
- L. Prioritize the implementation of school-based positive behavior supports. The excellent PBIS efforts now being implemented within 26 schools and the IST support in 19 schools should be continued and expanded, when necessary.
- M. Expansion of the current collaboration between general and special education to provide a 3-tier program for students with disabilities and other learning problems within schools not meeting the AYP.
- N. Training is needed for school principals, other school administrators, general and special education teachers, personal assistants, and other staff on strategies for providing LRE supports, services, and programs. The good work already begun in the Inter-School Inclusion Partnership Project and the *Inclusion Handbook* can be built upon and expanded. Training will also be needed that provides specialized strategies for working with students who have autism and/or related syndromes.
- O. Recognition that effective LRE or inclusive school practices requires time for general and special education teachers to plan. Thus, advance scheduling is a key ingredient for successful implementation.
- P. Assurances to parents that there will be a safety net in case their child is not successful in lesser restrictive programs, services, and supports.
- Q. Expanded interagency linkages and partnerships for collaborative programming beginning with the Infants and Toddlers Program, preschool, and school-age services. The positive work already begun with interagency school-based mental health and county wrap-around funds should be expanded. Focus on more fully integrating the Infants and Toddlers Program within the BCPS LRE continuum of services, with an emphasis on assuring a smooth transition to preschool and school-age programs with LRE supports and services.
- R. Expansion of opportunities for inclusive settings for young children 3-5 with disabilities or developmental delays, to include school and community options.
- S. Expansion of crisis support, social work services, psychological support, and counseling, particularly within the high schools, to better serve students with ED through additional resources, and/or more efficient allocation of existing resources.
- T. Provision of better training, direction, and supervision of crisis staff for more consistency in improving safety in the schools.
- U. Implementation of more effective uses of the special schools in the County (i.e., provide training, planning, and implementation of more innovative programs; utilize these schools as training and modeling resources to home schools; and implement more movement across the special and home schools to allow more

opportunities for students with and without disabilities to communicate and be educated together).

- V. Review of current practices for determining whether students are diploma or non-diploma bound—with considerations for students “in the middle.”
- W. Consideration of reinstating previous high school basic reading and mathematics classes to help students with disabilities gain content skills and knowledge to pass the MSA and help the schools meet their AYP.
- X. Consideration of additional career training for students with disabilities to help them transition from high school to the world of work.

13. With respect to LRE, Staffing decisions should be informed and directed by the development of a Comprehensive LRE Implementation Plan that should consider the following:

- A. In prioritizing prevention and early intervention, staffing priorities should include support for IST staff for additional schools and provide similar support for current and additional schools implementing PBIS.
- B. Expand inclusion staff at the kindergarten and school-age levels so that their caseloads can be reduced to approximately 12, depending on the unique needs of the students they serve.
- C. Prioritize staff providing resource support to help intervene early within the general education classroom and to prevent more serious disabilities and services provided in more restrictive settings/programs.
- D. Expand the numbers of crisis support personnel, particularly at the high school level, to support students with ED.
- E. Continue the support of mentors for beginning teachers who are inexperienced in implementing LRE supports. Expand mentoring support for more experienced general and special education teachers who are implementing co-teaching and other inclusive school options.

14. It is recommended that the BCPS require school-based planning of expanded LRE options and implement strong accountability for carrying out school-based plans which include returning students from non-public school placements by grade levels—beginning with elementary, then middle school, and finally high school.

15. It is recommended that BCPS personnel work across special education, general education and support services to develop and implement a Comprehensive LRE Implementation Plan that is aggressive and which includes sufficient staffing and incentives within the home schools to effectively serve their own students, including expanded crisis support and interagency support.

16. It is recommended that the BCPS provide staffing, resources, and incentives to support the implementation of a 3-5 year Comprehensive LRE Implementation Plan. It is also recommended that staff re-examine the use of existing resources to determine the level of efficiency, effectiveness, and fairness of their distribution and use.

17. It is recommended that Executive Directors of Schools, school principals, and other school administrators be required to develop and implement aggressive school-based LRE strategies within the SIP to systematically move toward the vision, goals and timelines of the BCPS Comprehensive LRE Implementation Plan.

18. It is recommended that the BCPS implement strong accountability for school administrators for implementation of school-based LRE plans/strategies.

19. It is recommended that BCPS professional development activities be based upon a comprehensive needs assessment of general and special education personnel.

20. It is recommended that the comprehensive, coordinated system of professional development to address legal and professional obligations to students with disabilities be long-range, systemwide, and based on the common core knowledge and skills essential for those serving students with disabilities. It is also recommended that the system include an evaluation process to establish future training needs.

21. It is recommended that professional development activities be coordinated between general and special education to ensure successful implementation of the LRE components described earlier.

22. It is recommended that professional development activities for special education be coordinated with professional development for NCLB requirements.

23. It is recommended that professional development activities be developed in cooperation with the Transportation Department to provide bus drivers and others with knowledge and understanding which relate to the following:

- A. Positive behavioral interventions and discipline procedures;
- B. Working with students who require special assistance, assistive devices and other medical equipment on the bus;
- C. Communicating effectively and professionally with parents, staff and administrators;
- D. Protecting the confidentiality of student information;
- E. Working as a member of a team with teachers, nurses, administrators and parents;
- F. Working with the specific health needs of students with physical disabilities; and
- G. Working with the medically fragile students on the bus.

24. It is recommended that the Office of Special Education establish ways to improve the implementation of transition programs for students with disabilities when the IEP dictates community-based instruction. Although not part of the charge of this study, there is the

task of finding a way to greatly enhance the use of supported employment for the special education students in need of meaningful career education as required in IDEA.

25. It is recommended that the BCPS study the impact of foster home placement within the school system and develop recommendations on how these students should be made to feel welcome within their home school and how to remedy some of the coordination problems surrounding this issue. It is also recommended that the BCPS explore creative solutions which have been used in other states in attempting to remedy the high financial impact on the schools receiving large numbers of foster home placed students.

26. It is recommended the BCPS work with the State Legislature to increase funding for the school system as a highly impacted school system and to pass legislation that requires school systems to forward student personnel files upon request in a timely manner.

27. It is recommended that the Department of Human Resources continue to improve the recruitment process for employing highly qualified special education personnel.

28. It is recommended the Director of Special Education, in coordination with the Department of Professional Development, set as a high priority the development of a comprehensive needs assessment for general and special education staff.

29. It is recommended that the BCPS make a commitment to develop and implement an appropriate student information system capable of integrating the needs of special education. This system should support strong program planning and implementation needs of the administration.

30. It is recommended that the BCPS pursue stronger communication and coordination between fiscal services and special education within the system. Specifically, the BCPS should consider the creation of a position in the Office of Special Education that has responsibility to support the fiscal oversight of the budget. This position should be staffed at a professional level to ensure communication among equals in the linkage with the business office.

31. It is recommended that regular quarterly, or at a minimum mid-year reviews should be conducted between fiscal services and special education to review budget figures and anticipate financial needs for the program prior to the end of the year. In addition, consideration should be given to the reorganization of the presentation of financial information in the area of special education to ensure that a comprehensive perspective of positions and costs is presented that is understandable for non-fiscal personnel.

32. It is recommended that the BCPS include within their comprehensive Professional

Development Plan professional development for IEP Teams regarding the fiscal implications of their decisions, related services criteria, LRE decision making, and provisions for allocation of personnel assistants.

APPENDIX 1

Appendix 1 contains a list of documents reviewed during the study; documents from the Baltimore County Public Schools are listed by the most recent.

- Baltimore County Public Schools, Staff Development Materials (agenda and Handouts – The Inclusion Project, March 22, 2004).
- Baltimore County Public Schools, Update Special Education Staffing Plan (Draft, March 17, 2004).
- Baltimore County Public Schools, Master Plan Progress Report, March 2004.
- Baltimore County Public Schools, Office of Special Education, The Inclusion Handbook, Spring, 2004.
- Baltimore County Public Schools, ED Programs Recommended for Return to Home Schools 2004-05 School Year.
- Baltimore County Public Schools, Agenda – Leadership Enhancement – Professional Development for Assistant Principals. Visionary Leadership: Planning for Positive Change, December 17, 2003.
- Baltimore County Public Schools, Professional Development (Assistive Technology), December 2003.
- Baltimore County Public Schools, Department of Professional Development, Parent Involvement Policy Committee, December 2003.
- Baltimore County Public Schools, Special Education 04-05 Draft Priorities – Rationale/Strategies, November 10, 2003.
- Baltimore County Public Schools, Letter to President, Baltimore County Board of Education, Recommendations from Citizen’s Advisory Committee for Special Education, November 4, 2003.
- Letter to President, Baltimore County Board of Education from Kelli Nelson, Citizens Advisory Committee for Special Education regarding recommendations about the internal special education school audit process, November 3, 2003.
- Baltimore County Public Schools, Draft 5 Year Plan for Special Education Programs, October 21, 2003.

- Baltimore County Public Schools, Handouts for training of IEP Team Chairs, County-wide Update Meeting, October, 14, 2003.
- Baltimore County Public Schools, Office of Special Education, Cluster Self-Contained Program Data, October 14, 2003.
- Baltimore County Public Schools, Timeline for Placements Out of Home-School (Public) 2003-2004.
- Baltimore County Public Schools, Special Education Countywide Programs, 2003 – 2004.
- Baltimore County Public Schools, Northwest-Area Clusters, 2003-2004, 2003.
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- Baltimore County Public Schools, 2003-2004 Special Education Cluster Self-Contained Programs, 2003.
- Baltimore County Public Schools, Office of Special Education, Salary Proposal for Sign Language Interpreters, October 2003.
- Baltimore County Public Schools, Procedures for Providing Accommodations to Students under Section 504 of the Rehabilitation Act of 1973, October 2003.
- Baltimore County Public Schools, Special Education, Cluster and Home School, Self-Contained Programs Data 2003-2004, September 1, 2003.
- Baltimore County Public Schools, Placement Updates (Referrals processed from 5/10/03 to 9/10/03, September 17, 2003).
- Baltimore County Public Schools, Factors Considered in Developing Draft First Year Plan (July 23, 2003).
- Baltimore County Public Schools, Master Plan, July 8, 2003.
- Baltimore County Public Schools, Office of Special Education, Budget, July 2003.
- Baltimore County Public Schools, Organizational Chart, Office of Special Education, Draft July 3, 2003.

- Baltimore County, Infants and Toddlers Program, Final Report for July 1, 2002 - June 30, 2003.
- Baltimore County Public Schools, Activities and Accomplishments, Baltimore County Board of Education, Citizens Advisory Committee for Special Education, 2002-2003, June 23, 2003.
- Baltimore County Public Schools, LRE Improvement Plan (Draft, 2003-2004).
- Baltimore County Public Schools, Office of Special Education, Memo Regarding, Non-Public and ED Placement Work Groups, May 28, 2003.
- Baltimore County Public Schools, Ron Boone, (Draft Report) Update and Next Steps Regarding the BCPS Action Plan to Eliminate Minority Overrepresentation in Special Education, May 26, 2003.
- Baltimore County Public Schools, Office of Special Education, Follow-Up Audit #1, Woodlawn High School, May 22, 2003.
- Baltimore County Public Schools, Effective Parent/Teacher Conferences, May 2003.
- Baltimore County Public Schools, Office of Special Education, Follow-Up Audit #1, Overlea High School, May 13, 2003.
- Baltimore County Public Schools, Data – Placement Updates – Referrals Processed from May 10, 2003 to September 10, 2003.
- Baltimore County Public Schools, Office of Special Education, Special Education Audit Report, Randallstown High School, April 23, 2003.
- Baltimore County Public Schools, Office of Special Education, Special Education Staffing Plan 2003-2004, April 2, 2003.
- Baltimore County Public Schools, Office of Special Education, Proposed Plan for 2003-04 Professional Development, March, 21, 2003.
- Baltimore County Public Schools, Summary of Mediation/Due Process Hearing, March 3, 2003.
- Baltimore County Public Schools, Focused on Quality: Committed to Excellence, Blueprint for Progress, January 13, 2003.

- Baltimore County Public Schools, Materials/Data – Over-representation of African American students, January 2003.
- Baltimore County Public Schools, Letter from Superintendent Hairston to State Superintendent of Schools Nancy Grasmick, concerning over-representation of African American students in special education programs, January 29, 2003.
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- Baltimore County Public Schools, Positive Behavior Planning Guide, 2003.
- Baltimore County Public Schools, LRE Comparison of Special Education Students Currently Attending BCPS Schools, December 1, 2002.
- Baltimore County Public Schools, Department of Federal and State Programs, Report to Address the Over-representation of African Americans in Special Education, November 13, 2002.
- Baltimore County Public Schools, Letter to Carol Ann Baglin, Assistant Superintendent of the Maryland State Department of Education, Baltimore County Public Schools Special Education Staffing Plan, September 13, 2002.
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- Baltimore County Public Schools, IDEA PROCEDURES, Individualized Education Program Team Process, Fall, 2002.
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- Baltimore County Public Schools, Placement in the Least Restrictive Environment – Revised, July 2002.
- Baltimore County Public Schools, Citizens Advisory Committee for Special Education, Kelli Nelson, Chair, Activities Accomplishments 2002/2003 School Year, June 23, 2002.
- Baltimore County Public Schools, Special Education Strategic Plan for Professional Development, June 2, 2002.

- Baltimore County Public Schools, Organizational Chart, Office of Special Education: Compliance and Placement, 2002 – 2003.
- Baltimore County Public Schools, Instructional Support Team Report - Results for the 2002 – 2003 School Year.
- Baltimore County Public Schools, Miscellaneous Data - Cluster and Home School Self-Contained Program Data – May 10, 2002, and Speech Language Pathologist Assignments – 2002-2003.
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- Baltimore County Public Schools, Federal and State Programs Organization Chart for 2002-2003.
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- Baltimore County Public Schools, Adapted Physical Education for Students with Disabilities in BCPS, February 28, 2002.
- Baltimore County Public Schools, Special Education Liaison Project Notebook, 2002.
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- Baltimore County Public Schools, Memorandum, Legal Services, Special Education and Related Services, October 1, 2001.
- Baltimore County Public Schools, Citizens Advisory Committee for Special Education, Mission Statement, Winter, 2001.

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- Baltimore County Public Schools, The Audit of Special Education and Related Services, Final Report, December 1998, Office of Internal Audit.
- Baltimore County Public Schools, Special Education Summit, May 29, 1998.
- Baltimore County Public Schools, Adapted Physical Education Program Guide, 1996.
- Baltimore County Public Schools, Coaches' Guide to the Allied Sports Program, 1995.
- Baltimore County Public Schools, Office of Special Education, Staff Meeting Minutes for the following dates: September 14, 2001, September 21, 2001, September 28, 2001, October 12, 2001, October 26, 2001, November 30, 2001, February 11, 2002, March 15, 2002, May 10, 2002, June 21, 2002, November 8, 2002, and January 24, 2003.
- Baltimore County Public Schools, Role and Responsibility Statements for: Physical Therapists; Occupational Therapists; Assistive Technology Facilitators and Teachers of the Visually Impaired, Undated.
- Baltimore County Public Schools, Parent Support Services, Building the Capacity for Increasing Student Achievement in Our Homes, Schools and Communities, Undated.
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