Special Education Department Organizational Change: A Case Study

Christina Castellane Cloidt

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SPECIAL EDUCATION DEPARTMENT ORGANIZATIONAL CHANGE:

A CASE STUDY

By

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A DISSERTATION

Presented to the Affiliated Faculty of

the College of Graduate and Professional Studies at the University of New England

In Partial Fulfillment of Requirements

For the degree of Doctor of Education

Portland & Biddeford, Maine

July, 2016
SPECIAL EDUCATION DEPARTMENT ORGANIZATIONAL CHANGE:
A CASE STUDY

Abstract

Special Education compliance is an area governed by mandates and assurance reviews by government agencies, both state and federal. This study presents the current state of the District Z’s Exceptional Learner Department prior to an organizational leadership change which demonstrated the need for improvement in the current system of functioning. The study continued to monitor and explore the changes the district made in personnel, protocols, procedures and how accountability was maintained in order to achieve improvement in a timely manner. Research is presented in the area of leadership and special education that exemplifies the need to enact change through prescriptive steps in order to facilitate school improvement. The study found that implemented systems, protocols and procedures uniformly paired with administrative accountability were successful in improving three areas of compliance. The study addressed the ability to conduct initial eligibility meetings within the 60-day required timeline, the presence of appropriate documentation of functional behavior assessments and behavior intervention plans in current student files and the perceptions of the faculty during the structural change in the organization. Interventions were developed and implemented to address these main areas of compliance. The key findings in this study were the success of the interventions, and impact of the organization change and the impact of distributive and transformative leadership.
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Doctor of Education
Educational Leadership

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July 25, 2016

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ACKNOWLEDGEMENTS

I cannot thank my family and friends enough for being so supportive and encouraging throughout the process including those who giggled as I brought all my books and technology with me to soccer tournaments up and down the east coast, international islands and family vacations.

Thank you to my loving husband for his support, cheerleading, encouragement when I felt defeated. There are no words that can communicate my appreciation of all he has done while on this journey with me.

Thank you to my children who have tolerated my retreats to the dining room table repeatedly and for long periods of time. My hope for you is that you see the benefits of education and continuing to strive for your goals. I hope that I have been an example for you that all things and dreams are possible with a strong support system and belief in yourself.

Thank you to my parents specifically for planting the see of learning early on in my life and showing me the value of marrying academic knowledge with experiential knowledge to benefit others especially our children and the students whose lives we continuously touch.

Thank you to Carole for always pushing me to challenge myself in my career and to strive for excellence for the children we serve.

Thank you to Dr. Timothy Wade, with whom I could never have come this far without his faith in me and support. Tim, you have been an amazing colleague and friend and have taught me so much. You have given me many opportunities to improve the lives of so many students. Thank you for honoring me with your participation in my journey.
Thank you to my committee members, Dr. Moskowitz, Lead Advisor, Dr. Nelson, Secondary member, and Dr. Collay for their guidance, support and confidence in me throughout this journey. Their advisement and feedback has proven invaluable. I would also like to thank a very special group of cohort members whom I met early on in the program that became my friends and support systems through the ups and downs. We decide early on we would stick together until all of us defended successfully, therefore, “leaving no scholar behind”.

I do have a special thank you to a dear friend (boss, leader, mentor, and inspiration) that passed who pushed me to submit the application and interview for the program when I did...to you Jane (Bullowa) for always reminding me to think outside the box, reflect on the past to inform the future, and always, always ask yourself "what have I learned and what would I do differently next time".

I know I have forgotten to mention some but please know your support and cheering has been invaluable during this amazing journey!
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CHAPTER 1

INTRODUCTION

Educating students with special needs in recent years has become laden with mandates from state and federal agencies (IDEA, 2015). As the nation attempts to reinvent its educational systems to increase the achievement of our children, the obstacles for students with disabilities become more challenging without providing additional supports and structures (Smith, 2014). It continues to be the expectation for and the responsibility of the local education agency (LEA) to provide students with disabilities a free and appropriate public education (FAPE) (IDEA, 2004; ESEA, 2015; NCLB, 2001). Former U.S. Education Secretary, Arne Duncan (2015) believes that the reauthorization of the Elementary, Secondary Education Act (ESEA) is only the beginning of continued school improvement and reform; he states that it is a provision in the law that provides students with opportunity and supports for students and school personnel while holding them accountable.

All districts in New York State are required to meet these compliance benchmarks. This is how the New York State Education Department (NYSED) identifies school districts that need to improve. One particular school district, District Z, the name has been changed to support anonymity, has been identified as having nineteen compliance citations and corrective actions that need to be addressed; if these areas of non-compliance are not corrected there will be substantial, reactive consequences imparted on the district. These compliance citations (Appendix A) are indicative of the district’s failure to meet regulatory compliance indicators of which there are twenty-two.
These compliance citations address various sub-categories of the indicators which are directly related to regulations.

The District Z currently has an enrollment of 10,988 students. Of the total population, 1588 students are classified as students with disabilities grades kindergarten through 12. This number is 14.4% of the total population of students. The target classification rate in New York State is 12%. This is an exact percentage that New York State sets as a percentage that districts should not exceed. Currently the district demographics are quite diverse, with 51.41% Hispanic, 25.85% African American, and 21.92% white non-Hispanic and other. There are currently 75.93% of students considered economically disadvantaged. The limited English proficient group is currently 13.37%. There are thirteen schools in the district. There are two high school campuses that serve students in grades nine through twelve and two middle schools serving grades six through eight. Three buildings contain grades kindergarten through eighth grade and six buildings are kindergarten through grade five. The remaining building is a pre-kindergarten building whose numbers are not included in the totals presented earlier. The Special Education classification rate for school age Committee on Special Education (CSE) is 14.4%. This percentage represents 1,588 students in kindergarten through twelfth grade. This data does not include preschool children with a disability (Committee of Preschool Special Education); therefore, the pre-kindergarten building will not be included in this study. District Z currently has nineteen compliance citations by New York State Department of Education’s Department of Special Education as described in the following sections.
District Z has begun to internally address the issues of compliance with a multi-faceted approach. They analyzed current personnel in the Exceptional Learners Department; formerly called the Special Education Department and made decisions to reorganize the department. Without fiscal relief to enact change from the government, neither state nor federal, decisions were made regarding leadership structures and systems for fiscal year July 1, 2015 through June 30, 2016. For the purpose of this study the Exceptional Learners Department includes the Executive Director of Exceptional Learners, Special Education Supervisors, School Psychologists, and Special Education Support Staff. From here forward, unless specifically mentioned, the Exceptional Learners Department will be inclusive of these groups. These groups are employees whose job descriptions and responsibilities are directly related to the education of students with disabilities unlike the Exceptional Learners Board of Education Committee.

The Exceptional Learners Board of Education Committee has also been created to act as a sounding board or a task force for all presentations to the Board of Education. This committee consists of two board members, five Supervisors of Special Education, Executive Director of Exceptional Learners, Deputy Superintendent, one psychologist, one parent advocate, speech and language pathologist, and director of pupil personnel services department. Such presentations will include proposal for additional staffing, changes to the continuum or any additional ideas/interventions that may be suggested.

The central office staff identified areas that needed internal reorganization of administrative structures. Reallocation of fiscal resources to develop more efficient and fiscally responsible Special Education leadership systems and structures occurred. District Z has begun to address leadership, change and organization structures in its
central office Exceptional Learners Department configuration to ensure formal alignment to the district document *Vision 2020-The Way Forward*, (Padilla, 2015) using distributed and transformative leadership theories. *Vision 2020-The Way Forward* is a document that describes the “why” or purpose of what is being done as coined by Simeon Sinek (2003). According to Sinek (2003), people need to know the “why” of what we do before they will “buy in.”

The district’s mission and vision have been developed prior to July 1, 2015 by a committee. The mission and vision support the development of strong structures, systems and protocols. The board of education has directed district leaders to address these concerns in the Special Education Department immediately. The previous leadership within the department resigned from their positions at various times during the previous year and the Assistant Superintendent for Inclusive Education position was dissolved. This led to the opportunity to reorganize the department for maximum effectiveness.

Decisions within district leadership and the board of education were made to hire a new Executive Director of Exceptional Learners and two Supervisors of Special Education to address the needs of the department in rectifying the compliance issues. The Exceptional Learners Department was also reorganized to move under the direct supervision of the Deputy Superintendent. After the new Executive Director and two Supervisors started on July 1, 2015, it became evident that the work that needed to be done was extensive and more leadership was needed in the form of Special Education Supervisors. The superintendent, deputy superintendent and new executive director made the recommendations to the board of education to dissolve three Committee on Special Education (CSE) chair positions. The chair positions were currently vacant and were
considered teacher on special assignment positions. A teacher on special assignment is a position filled by a teacher and works on a teacher’s schedule; however, this individual is released from classroom responsibility to conduct the work of the committee on Special Education chairperson. It was decided to hire three additional supervisors of Special Education, administrator positions, in their place.

A committee of multiple stakeholders created an improvement document in spring 2015. The document, *Vision 2020-The Way Forward* (Padilla, 2015), is the commitment and guide to district improvement as measured by performance. *Vision 2020-The Way Forward* proposed a theory of action that promises, if we cultivate collaborative communities that generate input from all levels of the organization on issues related to instructional practice and student learning, then we will foster a shared purpose and vision for our work leading to more effective practice and higher levels of student achievement. It is a plan for change and improvement governing all initiatives and change during the 2015-2020 school years (Padilla, 2015, p. 8). Dr. Padilla stated “Our work will be intentional because we are committed to creating a culture of deliberate excellence” (p. 4). This document communicates to all staff that interventions, changes and developments throughout this transformation will be thoughtfully deliberate. Being deliberate in directing change and making decisions for the organization provides opportunities to change organizational culture and foster improvements towards compliance.

The mission of the district, which is also publicized in the document *Vision 2020-The Way Forward* is “Inspiring students to become leaders of tomorrow beyond Academy Field” (Padilla, 2015); Academy Field is the stadium in which our high school
students celebrate graduation. It is symbolic of the future yet transcends all demographics represented in the district, creating an inclusive community. There is also a vision presented in *Vision 2020-The Way Forward*, “Through the work of all, we will achieve inclusive excellence” (Padilla, 2015, p. 9). According to Fullan (2001, 2008) and Kotter (2012), educators must first develop a mission and a vision in order for change to begin and ensure success is sustained.

*Vision 2020-The Way Forward*, includes pillars of strategic improvement in five areas: District-Wide Systems, Effective Leadership, Educational Equity & Excellence, Family & Community Engagement, and Supportive Learning Environment (Padilla, 2015). Ensuring these pillars are consciously considered in the phases of change, planning and development will assist in demonstrating and supporting a continued philosophical alignment for departmental improvement. The pillars also articulate the core values we need to stand by: Nurturing, Empowerment, Collaborative, Student-centered and Diverse (Padilla, 2015). NYSED, cited District Z and provided corrective actions in 2013 based upon multiple compliance citations, which means that District Z is currently required to address all areas of non-compliance through addressing the corrective actions built into the same document. The full listing of citations and required corrective actions are located in Appendix A. If progress towards compliance is not seen or met, there is the possibility of decreased federal and/or state funding. Padilla (2015) stated that all levels of the organization must be responsible and accountable for using data which can be in many forms to govern our decisions and actions.

District Z currently has nineteen citations for compliance in the area of Special Education as indicated by NYSED Special Education Department requirements, which
are based upon Special Education regulations. *Vision 2020-The Way Forward* was originally developed to address the instructional improvement needs of the district as an entire entity; however, it also embraces the changes needed in the Exceptional Learner’s Department in order to reduce areas of non-compliance and increase success for students with disabilities. Currently, the district is out of compliance with 986 (49.3%) students having overdue re-evaluations. In order to become compliant, 986 re-evaluations need to be completed in the 2015-2016 school year.

**Problem Statement**

District Z is currently cited with nineteen areas of non-compliance. As District Z works toward meeting compliance as set forth by New York State Education Department (NYSED) with no fiscal relief to rectify these issues, a new leadership structure has been implemented as of July 1, 2015.

By not meeting compliance, District Z has become identified by the state of New York as needing to address non-compliance citations. If District Z does not demonstrate improvement towards compliance federal and/or state funding may be jeopardized. Under Part 200 of the New York State Commissioner’s Regulations governing education law for students with disabilities, students with disabilities are required to receive a re-evaluation every three years. Currently, the district is out of compliance with 986 (49.3%) students with disabilities having overdue re-evaluations. In order to become compliant, 986 re-evaluations need to be completed during the 2015-2016 school year. These re-evaluations are needed in order to ensure students are receiving the appropriate instructional program and supports for their individual needs. District Z has the responsibility to meet the 60-day timeline for initial evaluations which has not been happening consistently. New York
State regulations state that to be fully in compliance you must conduct an initial eligibility determination meeting for 100% of initial referrals in order to be compliant. Multiple areas governing functional behavior assessments (FBA) and behavior intervention plans (BIP) also have multiple citations in the compliance document. These areas include the existence of the FBAs and BIPs for students who demonstrate a need for them, the implementation systems and the ongoing monitoring of such plans for student success surrounding behavior. For the district to meet compliance, systems and structures need to be put into place to address the seven citations specific to this regulation.

Historically, the Special Education Department, now renamed the Exceptional Learners Department, has not been able to address the compliance needs of the district. District Z has been cited in previous years with little or no improvement towards compliance as evident through data collection and analysis. The non-compliance document indicates a corrective action due date of 12/2/2013. Students with disabilities have a right to equitable, public education, identified as a Free and Appropriate Public Education (FAPE), as mandated by federal regulations. It is the responsibility of the local education agency (LEA), which in this case, is District Z, to provide that for them in a public school setting.

**Purpose of the Study**

The purpose of this descriptive case study (Baxter & Jack, 2008) was to document the transformation of both organizational structure and systems developed by District Z’s Exceptional Learners Department. A descriptive case study is a qualitative research design that demonstrates connections between relationships in which an experiment is
conducted which in this case study will be the interventions that are put into place to address three areas of non-compliance. The current state of District Z was measured prior to the interventions and then reviewed post intervention.

The results of the development of a functional organizational structure with systems of accountability through procedures and protocols is demonstrated in this study. The outcomes of the interventions imparted including the implementation of systemic protocols, and procedures were paired with systems of accountability throughout the study were measured. Universal use of the developed procedures and protocols provided data for an analysis of the impact of these intervention on areas of non-compliance. Through the use of a distributed/transformative leadership model, the Exceptional Learners Department developed protocols and procedures to ensure leadership success as measured by interview responses of the school psychologists in four buildings and four supervisors of Special Education which includes data to address the compliance citations. A sense of urgency was created externally by the nineteen citations of non-compliance from NYSED. Even though a sense of urgency was externally created by NYSED, the board of education also demanded reform and improvement. By creating a sense of urgency the beginning steps to enacting systems change was fulfilled (Kotter, 2012). This case study took place during the inaugural year of the new leadership team that started on July 1, 2015.

The significance of the study is the impact it had on students with disabilities being able to receive the needed programming and supports in a timely fashion while systems and structures are implemented with fidelity to increase their success within the
educational system and beyond graduation as they become integral members of our adult communities “Beyond Academy Field” (Padilla, 2015).

**Research Questions**

A commitment statement by the Superintendent stated the main goal as educational leader of District Z is defined in the document *Vision 2020- The Way Forward*, which provides a research based theoretical structure for organizational change specific to District Z. The administrative leadership has developed into an organizational entity that is self-reflective, knowledgeable, and trustworthy. These characteristics guide the pillars of *Vision 2020 – The Way Forward* which defines the collective responsibility District Z has to ensure all of our students are successful (Padilla, 2015). The following essential questions guided the research throughout the study.

- How does distributed and transformative leadership theory impact systems, protocols and procedures in the District Z Exceptional Learners Department?
- What are the perceptions of stakeholders, pre-intervention and post-intervention?
- What protocols and procedures have been developed to ensure movement towards compliance and consistency of practice in the Exceptional Learners Department?

**Conceptual Framework**

Using a shared model of distributed and transformative leadership theory, the new Exceptional Learners Department, formerly the Special Education Department, staff developed systems and effective leadership to bring the district back into compliance while reaching for educational equity and excellence for all students (Menon, 2013). As of July 1, 2015, an entire new staff was hired in the Exceptional Learners Department. The only veteran department members were five secretaries and three chairpersons for
the Committee on Special Education (CSE). As of the July 1, 2015, the department structure consisted of an Executive Director, two Supervisors of Special Education and nine chair people (chairs) for the Committee on Special Education (CSE). The two supervisors were hired also for a July 1, 2015 start date and three chairs were already employed in those positions. Upon review of the current status of the compliance citations and staffing options as none of the additional CSE chairs had yet been hired, the Executive Director proposed to increase the Supervisor number to five in total and have four CSE chairs. That is the current structure of the Exceptional Learners Department. Three additional supervisors were hired and one additional CSE chair was hired. The major difference in the structural formation is that the chairs are “teachers on special assignment” and the supervisors are administrative personnel. The entire Exceptional Learners Department was officially in place as of August 19, 2015.

Pairing the ideas of transformative leadership with distributed accountability to develop and monitor progress both quantitatively and qualitatively throughout the process development of collaborative communities has enhanced the work. Utilizing a theory of action District Z made the commitment to “cultivate collaborative communities that generate input from all levels of the organization on issues related to instructional practice and student learning” (Padilla, 2015, p. 8). It led to the “shared purpose and vision for our work leading to more effective practice” (Padilla, 2015, p. 8). Developing and sustaining systems, structures and protocols for the Special Education department in order to facilitate the successful achievement of the Special Education department as measured by the quantitative data of compliance and the qualitative data collected pre- and post-intervention.
The use of transformative theory of leadership provided the school district with the structure of a theory that provides focus on the interaction of the leaders rather than only on the action itself (Menon, 2013). Menon (2013) suggested that real change and transformation cannot happen within the action itself but the relationship of one action to another, therefore transforming leadership.

Distributive leadership theory is still young in its development and advises organizations to focus on “cohesion and trust” as coined by Harris (2004). This leadership approach requires that all leaders work together with each other in concert by not duplicating actions or resources while trusting the other leaders are doing what needs to be done. They work in conjunction with a mutually agreed upon outcome (Harris and Spillane, 2008). Their conclusion stems from observations of current leadership models and the transition which that has governed the Exceptional Learners Department which includes the declaration of the use of distributed leadership in Vision 2020-The Way Forward (Padilla, 2015). The Exceptional Learners Department in District Z has had difficulty in meeting compliance requirements for Special Education students resulting in non-compliance citations being issued to them by New York State Education Department in a Non-compliance Citation and Corrective Action document (See Appendix A).

**Assumptions**

This study assumed that leadership has a focus on organizational structure; and change and improvement are a priority within the central office administration and the Board of Education. Both groups are in full support of the endeavors of the new department leadership under the direction of the Executive Director for Exceptional Leaners. The Special Education supervisors, department support staff and psychologists
as part of the Exceptional Learners Department being surveyed and interviewed during critical points in this study are experts in their field and see the need for the change in systems while developing protocols and procedures. There is a need and a desire for systems that have positive outcomes for students with disabilities.

There is an assumption that the Exceptional Learners Department, as defined earlier being the Executive Director of Exceptional Learners, supervisors of Special Education, psychologists and support staff within the department, have answered truthfully since there is a desire and need for change that they want their perceptions communicated in order to influence the processes and protocols. It may be assumed that the Executive Director and supervisors believe they are empowered to correct the issues of non-compliance, however, may not feel responsible for the events leading to the non-compliance issues since they were not employed by District Z at the time of being cited.

The participants’ responses in both surveys and interviews were anonymous and electronic as well as coded using NVivo 11 Pro. The participants had the ability to withdraw their participation at any time including during the later data collection sessions.

**Delimitations/Limitations**

The Special Education classification rate for school age Committee on Special Education (CSE) students in District Z is 17.69%. This percentage encompasses 1,944 students in kindergarten through twelfth grade. This data does not include preschool children with a disability (Committee of Preschool Special Education); therefore, the pre-kindergarten building will not be included. This percentage is higher than New York
State’s desired 12% classification rate. There are 15.5 full time equivalent school psychologists currently employed by the district.

The timeframe, school year 2015-2016, is delimitation in itself. School change for academic achievement measurement can take years to gather data. For the purpose of this study, the development of protocols, and procedures paired with the human reorganization and perceptual data provided defined the outcomes of the research through the study.

One of the limitations of this study is the current state of the data that is being used to provide the baseline numbers. This is a very diverse and large school district located in an inner city. The specific research findings are only applicable to District Z. The interviews provided evidence to support the need for change in organizational culture; however, responses may be biased based upon position and district level experience even though job titles in comparative groups were the same.

At this time one of the limitations that may influence the study was the sense of urgency was instilled as an external force. It is unclear at this time if the momentum of change will be sustainable if the sense of urgency does not become internally recognized and embraced (Fullan, 2001, Kotter, 2012). The high classification rate was also a limitation to this study and while the district is working to address the classification rate as annual reviews occur to determine at the committee on Special Education level if the students continue to meet eligibility requirements or if general education supports, such as response to intervention, would be sufficient there is a chance the rate may grow. The district is also identifying instructional components to address to ensure quality universal instruction for all students in order to address the over classification rate. The protocols
and procedures being put into place assisted with efforts to provide universal instruction. Another limitation is the high percentage of students not in a least restrictive environment. That structure is also being reviewed during the time of this study but will only be included in a superficial nature since this study focuses on re-evaluations and timely evaluations as partial indicators of progress towards compliance and that the new organizational systems are making progress.

Another limitation to the study may include bias of participants towards the researcher. The researcher was an employee (teacher, leader, professional developer) of the district for twelve years, left to pursue other educational career goals and has recently returned to the district after seven years as a central office administrator. Although many professional relationships are intact, there is the possibility that prior relational knowledge of the researcher impacted responses. The status of the researcher as now an administrator may influence participants. In order to address the bias, participants’ responses to surveys will be anonymous. During interviews, the interviewees’ responses were coded to decrease the risk of identification. The researcher is not the evaluator of the subjects being interviewed or surveyed. The tools used did not request or refer to identifiers within the participants answers that may identify from whom the data was retrieved.

**Scope**

The scope of this study is limited to the structure of the department leadership, the development of the structures, systems and protocols and their impact closing the compliance gap. The data was collected district wide for consideration in the quantitative parts of the study. The qualitative parts of the study were limited to four of the nine
elementary schools. The schools are different sizes and house kindergarten through grade five students. The change in perception of the department, through the lens of the Executive Director of Exceptional Learners, the Supervisors of Special Education, psychologists of the four elementary buildings and the Exceptional Learners Department support staff provided the perceptual data.

**Significance**

With the current state of Special Education in the district, being identified with nineteen citations of non-compliance since 2013, action was taken to address the lack of systemic protocols and procedures. Compliance in Special Education comes in the form of twenty compliance indicators: graduation rates, drop-out rates, assessment, suspension/expulsion, least restrictive environment for school age children which is defined as students ages 6-21, least restrictive environment for pre-school age which is defined as students ages 3-6, pre-school outcomes, parental involvement, disproportionality in Special Education by race or ethnicity, disproportionality in Special Education in classification/placement by race or ethnicity, child find, defined as the ability to “find” students who meet the criteria for the provision of Special Education services, early childhood transition, secondary transition, post-school outcomes, identification and correction non-compliance, complaint timelines, due-process timelines which are 60 days for school-age children and 30 days for pre-school age children from the date consent is received, hearing requests resolved by resolution session, mediation agreements and state reported data. For the purpose of this study, focus was given to due-process timelines, timeliness of re-evaluations which are due every three years for students with disabilities and compliance issues surrounding functional behavior.
assessments (FBA) and behavior intervention plans (BIP) as defined by the citations from the New York State Education Department (See Appendix A).

The district has failed to meet compliance in multiple required New York State Education Indicators over multiple years. This failure to meet compliance is measured in various ways depending upon the indicator applied. In some cases, student achievement data is used to determine compliance. New York State Education Department has cited District Z for nineteen areas of non-compliance and imposed corrective actions. For these compliance citations District Z tracked interventions for improvement to address these citations. This is defined by needing to reach 100% compliance for timely evaluations and re-evaluations annually. This study collected historical data from September 2014 through June 2015 and data from the current school year September 2015 through April 2016 to monitor the effects of the interventions including the development and implementation of the systemic protocols, and procedures and their impact towards meeting compliance. Under Part 200 of the New York State Commissioner’s Regulations governing education law, students with disabilities are required to receive a re-evaluation every three years. Currently, the district is out of compliance with 986 (49.3%) students having overdue re-evaluations. What this means, is to become compliant, 986 re-evaluations need to be completed in the 2015-2016 school year. These re-evaluations are needed in order to ensure students are receiving the appropriate instructional program and supports for their individual needs.

District Z is failing to meet federal guidelines put forth and enforced by NYSED regarding timely initial evaluations. School age students need to be evaluated and a committee on Special Education needs to be convened within sixty days to determine
eligibility of a student with disabilities. These timelines are also currently not followed and therefore the state categorizes District Z as non-compliant.

District Z is working to address the seven citations surrounding FBA and BIPs. An FBA is completed for a student whose behavior is suspect to have or will have impeded their ability to learn. If the finding is that the student’s behavior is part of the obstacle to the student learning a BIP is developed to address the antecedents and or the behaviors themselves in the learning environment to enable the student to achieve academically.

There are additional indicators in which District Z is out of compliance, however, these were the areas addressed in this study and measured as quantitative data to indicate progress and effectiveness of protocols and procedures developed. The level of reorganization of the leadership structures and approaches take into consideration the degree of non-compliance with the decrease in least restrictive environments and the overall need for support in all settings to increase quality instruction while addressing compliance issues.

With the need to become compliant and lack of progress in the past, it was necessary to completely restructure the Exceptional Learners Department to create a more effective organizational structure to develop systems and protocols within which to be successful in meeting compliance, increasing morale and reputation of the department.

There are systems and approaches to administrative structures that have merit throughout the education forum (Fullan, 2001) which are missing from the current structure of the Exceptional Learners Department in District Z which need to be addressed. There are many studies on leadership in education in the areas of
organizational structures and theoretical frames (Bolman & Deal, 2013, Fullan, 2001, Kotter, 2012,). However, there is little literature on organizational structures in Special Education systems and/or departments within bigger school system structures (Crockett, Billingsley & Boscardin, 2012).

**Definition of Terms**

Free and Appropriate Education (FAPE): defined by Individuals with Disabilities Education Act (IDEA) as the legal rights of students with disabilities receive and equitable education through the public school system, this is guaranteed by the Rehabilitation Act of 1973, (IDEA, 2004).

Compliance: For the purpose of this study, compliance is defined as the meeting the regulatory benchmarks set forth by the New York State Education Department in the areas of timely evaluations, including both initial and re-evaluation.

Part 200: These are the regulations of the New York State Commissioner of Education governing students with disabilities.

Re-evaluation: This is the term used to define and describe what is required under Part 200 of Commissioner Regulations in order to ensure updated evaluations for all students with disabilities every three calendar years

Timely evaluations: a timeline set forth by Part 200 to ensure students suspected as having a disability receive his/her evaluations in a timely manner

Least Restrictive Environment: The level of inclusiveness in general education participation of a student with a disability.
Conclusion

Embracing transformative leadership theory and distributed leadership theory provided the structure needed to enact the department modifications necessary for success in meeting the goals set forth by the Exceptional Learners Department during the 2015-2016 school year. These theories are already embraced by the staff that governs the Exceptional Learners Department. By developing structures and protocols for systems, the Exceptional Learners Department were able to implement interventions and maintain accountability for timely evaluations and meeting compliance as defined by New York State Compliance Indicators. The district publication, *Vision 2020- The Way Forward*, was the guiding document of the development of structures in the Special Education Department. The Special Education Department aligned its work to the document called *Vision 2020 – The Way Forward*. By the use of a survey and interviews to collect qualitative data while tracking quantitative data to determine progress, this study was able to report progress towards rectifying the compliance citations. The pillars assisted to define the work of all to meet the needs of students with disabilities. Chapter Two includes a review of current literature governing change theory, distributed leadership theory and transformative leadership theory. The methodology is defined and explored in Chapter Three; it is here that the pre-study data will be formally introduced and explained. Also included in Chapter Three, the description of the data that was sought and how such data was analyzed. Chapter Four provides the results of the study. The outcomes are provided and logically connected to the purpose of the study and how the results address the problem stated earlier. It will be here that the qualitative data and the
quantitative data will be outlined. Chapter Five ties all aspects of the study together, providing a summary of findings, results, and recommendations.
Our education system was never designed to deliver the kind of results we now need to equip students for today’s world and tomorrow’s. The system was originally created for a very different world. To respond appropriately, we need to rethink and redesign. (Wagner, Kegan, Lahey, Lemons, Garnier, Helsing, Howell, and Rasmussen, 2006, p. 1).

Systems change is herein defined as the activity of adjusting, revising, rebuilding, redesigning an educational organization, is a process that is both challenging and necessary to advance progress. Prominent researchers in the area of systems change propose various components they believe are integral in facilitating changes in leadership. The change leadership researchers explored during this literature review include Michael Fullan, John Kotter, Tony Wagner, Robert Kegan, Lisa Lahey, Richard W. Lemons, Jude Garnier, Deborah Helsing, Annie Howell, and Harriette Thurber Rasmussen. Wagner et al. suggested that there is no one authority regarding successful change in school systems (2006, p. 17). However, prominent change leaders all agree that having clear mission and vision statements and beliefs are of the utmost importance when facilitating change in complex systems although they differ on the preparatory steps to enacting change and where that development occurs (Kotter, 2012).

Kotter (2012) proposed in his research an eight stage process for change. He began by stating that the first step is to create a sense of urgency. This can be done by capitalizing on a “real” crisis or the leader creating a crisis to serve this purpose. In the current study the sense of urgency is created by the need to move towards and completely
into compliance. This is an external factor to influence urgency. The district was able to propose the need for intense restructure, reorganization including releasing and hiring personnel. The next step once urgency is created, a group of people is established for which Kotter dubbed as the guiding coalition. These are the change facilitators, which invest in the scope of the change that is being implemented or developed; they must be trustworthy and share the overall vision of the change while balancing enough power to enact the change. Developing the vision must occur early on and be communicated frequently which may even make it seem overly communicated. With development of the vision, strategies for achievement should be discussed and outlined. Currently the district has a district wide mission, and a vision in which all activities, initiatives and plans for improvement must align. This provides for the structure to develop a department vision that aligns. These components need to be communicated repeatedly as Kotter suggested in his eight stage process as his stage four (Kotter, 2012. p. 23). Employees must feel empowered by the guiding coalition and/or the change leader in order to maintain the momentum of the process. This empowerment is explicitly spoken about in stage five. The guiding coalition in this instance is the new department members, the five Supervisors of Special Education, the Executive director of Exceptional Leaners and the Deputy Superintendent, must model the behaviors they want the staff to engage in and maintain. During this Kotter (2012) asserted that change in processes, protocols and current non-working systems are adjusted, adapted or excessed completely. This may also be the time to take non-traditional risks and capitalize innovative ideas (Kotter, 2012. p. 23). Stage six included the push to maintain momentum and should include celebration of benchmark successes. Engendering formative gains is integral in keeping
the momentum of the change process steady. Kotter suggested that when momentum is sustained change itself moves in a more fluid manner and is directed through reflection of progress paired with the need to “consolidate gains” (stage seven) and relinquish unnecessary interdependencies (Kotter, 2012). At this stage in the change process you need to reflect upon the process itself and attempt to solidify the change while capitalizing on the momentum to change more systems and reenergize the initiative. Stage eight consists of the need to ground the new changes permanently into the culture of the organization. This stage will hopefully occur at the conclusion of the school year and a plan will be developed for the next steps (Kotter, 2012).

Educational change leader Michael Fullan stated, “Leadership must be cultivated deliberately over time at all levels of the organization” (Fullan, 2001, p. x). He also asserted that schools must become living organizations that reflect, review and refine its systems. If that does not happen then schools as organizations will fail (Fullan, 2001). That is one of the reasons this district is in the current state that it is, it has over time resulted in a lack of progress which has been determined by NYSED to be non-compliant. As change evolves and becomes more prominent in the education system, Fullan found that reform is less dependent on the individual and more dependent on the many.

Fullan provided us with a framework (see Figure 2.1) for leadership that complements the change process developed by Kotter (2012). Fullan proposed five components of leadership that work together to develop positive change in school systems that are ready for reform. The five components are “moral purpose”, the need for leaders to “understand the change”, “relationships”, “knowledge and creation sharing”,

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and finally “coherence” (Fullan, 2001, p. 4). Leaders must embrace the five components in order to facilitate and draw out commitment from the members. The leaders are the five Supervisors of Special Education in this particular study. The Executive Director and Deputy Superintendent are also leaders who embraced the components in order to facilitate commitment from the Supervisors.

Fullan (2001) ascertained that once these components are in place you receive positive results (p. 4). The need to establish “moral purpose” provides the rationale for making a difference in the life of students. It answers the questions of why and so what when enacting change. It must also include strategies for getting there; have accountability measures that lead to assessment of the purpose (Fullan, 2001. p.20). Bolman and Deal (2000), shared that a connection to Fullan may be the need for a higher purpose, a delineation of core values, which leads to cultural change and sustainability in organizational development. The district also has developed a comprehensive set of core values and pillars of success that directly speaks to the expectation of the superintendent and his desire to maintain urgency in the quest for excellence (Padilla, 2014). Leaders of change understand change (Fullan, 2001. p. 34). In his framework, Fullan purported that in order to lead the change in an organization, especially education; you must first understand change itself. It is not about being able to manage or control the change; it is about the idea of understanding change and its complexities. He suggested there are six components to this understanding: knowing that the “goal is not to innovate the most, not enough to have the best ideas, appreciate the implementation dip, redefine resistance, re-culturing is the name of the game, never a checklist, always a complexity” (Fullan, 2001. p. 34). Fullan deferred to Goleman’s research of six leadership styles: Coercive,
Authoritative, Affiliative, Democratic, Pacesetting, Coaching (Goleman, 2000, p. 82-83). With the exception of coercive and pacesetter styles, they are all effective in supporting a positive culture. The next component in the framework is relationships which should be easily discussed. Building trust, respect and rapport are integral in changing culture. The district in the study needs to be shown what good relationships built upon those three components can accomplish for the most important aspect of our goals…the students.

There have been too many damaged relationships in the department that the perception is that Special Education is non-responsive to student’s needs and teachers’ needs paired with a lack communication and follow through. According to Kouzes and Posner (1998) there are seven key aspects to developing positive relationships: “setting clear standards, expecting the best, paying attention, personalizing recognition, telling the story, celebrating together and setting the example” (p.18). They also ascertained that if you do not care about those you lead; you will not obtain a positive relationship which will then not lead to change. The change agents in the district must begin by developing those relationships. Asking them to articulate their plan for insertion to the district and building in which they will be leading through the Special Education improvement.

Knowledge building is the art of knowing what you know and sharing it. Of course the opposite is also true, gather knowledge that you do not know from those who do have that knowledge. The core group of Supervisors is currently a group of professionals with multiple talents and expertise that overlap but are not the same. It is their responsibility according to Fullan to dialogue and share that expertise as they lead change. The final component in Fullan’s Leadership Framework is the notion of coherence making. Fullan described this aspect by introducing three features to describe it. Lateral accountability
being the first to appear is the idea that we are accountable to those around us not just us
those above us in a hierarchical structure and he ascertained that a lateral accountability is
more valuable than a hierarchical accountability. The second feature deals with the
knowledge base of those involved. It is the navigation of the knowledge making sense in
the context of the change. The final feature discussed the idea of a “shared commitment”
(Fullan, 2001. p. 118). With a promise that is shared and aligned, success is more
coherent. The remainder of the framework consisted of the outer circle that encompasses
the hard work of the leader, feelings that enable the leader to be charismatic in his/her
role. These are characteristics that enable and enhance membership commitment. The
members will be motivated by the leader to enact change which will lead to positive
changes that last which is the goal of the Exceptional Learner Department and therefore
the district. Positive changes mean better education and supports for children.
Wagner et al. (2006) continued to develop school systems change in their literature. The authors recognized the need to be flexible, knowledgeable and committed.
Their research on school leadership reform coincided with aspects of both Fullan (2006) and Kotter (2012). Similar steps to school improvement are the development of a shared vision and creation of change momentum. This literature provided a guide to develop capacities for change with the overarching goal of improving instruction in our schools. It attempted to increase instructional leadership to increase the rigor in our schools, which in the case of this study, would directly impact the Special Education settings in the district.

Looking toward the change being enacted in this study, Wagner et al. (2006) provided a connection between change leadership and instructional leadership. Wagner et al. (2006) is structured such that it takes the change agent or leader through a series of chapters, in a linear fashion. The authors provided instruction and guides to be a facilitator of change; it begins with the most basic of steps and knowledge. Wagner (2006) shared with us that up until recently educators have not been part of a system or community of practice.

In alignment with the Fullan (2001, 2008) and Kotter (2012), Wagner Et al. proposed a set of components for educational change. Wagner called them the Seven Disciplines for Strengthening Instruction (Wagner et al., 2006. p. 27). These disciplines have many of the same characteristics of previous research in the literature focused on change although the twist here is the direct correlation to student results. The disciplines are to develop a sense of urgency, create a vision of what good teaching looks like, hold gatherings about the work that needs to be done, create a vision of student results, effective supervision, professional development needed to sustain the change in instruction and finally, collect data and establish accountability opportunities.
The authors began by challenging those in the midst of change to fully commit to change and developing a community with a shared vision. They spoke to the value and necessity of momentum and urgency but cautioned us about proceeding too quickly. As much as the district needs to move forward quickly we must be cautious to not enact too much change too fast as it will then be unsustainable and perhaps the members’ support, as suggested by Fullan (2001), will diminish. The literature continued to guide the process of change in specific more discrete topical areas than the previous researchers. Teachers may be teaching but the main question is to determine the viability of a lesson by gauging “what students know and are able to do as a result of the lesson” (Wagner, et al., 2006. p. 30). This is a paradigm shift that teachers must embrace in the realm of the new accountability systems for students as well as teachers. Leaders need to change the conversations they have with teachers, especially if educators are going to make the change occur.

The 3 R’s that Wagner et al. (2006) suggested are discussed are rigor, relevance and relationships. One of the cautions proposed is the trap that obstacles may be created that hinder progress as an organization embedded in change, leaders must be conscious of these opportunities that develop obstacles. By being aware of the possibilities and consistently reflecting upon the process, leaders will make the organization that much less prone to obstacle development. If they can maintain awareness of the process, a decrease in momentum will be avoided.

Compliance and engagement are also similar but very different from each other. The goal must be engagement that will foster two-way dialogue and discourse and is not driven by “must” and “rules”. As can be imagined engagement is more powerful,
successful and sustainable hen not posed as a directive although sometimes that is necessary (Wagner et al., 2006. p. 71). Wagner et al. (2006) provided a Venn diagram (Figure 2.2) to guide our school improvement development. It illustrated the integration of the four C’s as described. The four competencies illustrate the interconnectedness of the culture, conditions, competencies all surrounded by the realities of contexts which are multiple understandings that need to be considered. The center of the Venn diagram is the ultimate school improvement goal. They suggested using this structure as a diagnostic tool to improve systems and structures to impact teaching and learning. This tool will be effective in diagnosing some of the strategies and improvement needed in various buildings in the district. It then leads to developing a strategic improvement. Using this within a school system could create an opportunity for taking responsibility for current state of affairs therefore making the urgency for change more real and able to be enacted upon.
Developing a community within a school is one of the most important steps to being successful in leading a change initiative and should be the first action. One type of community is a coaching community. This type of instructional community attempts to develop its members into coaches. It stems from the basis that we all have knowledge to share and can learn from one another. To enact change on all levels of the organization, which in this case is the district, all stakeholders need to have a role. One way to do that is to develop communities of practice; this term is used purposefully because the research indicated that the strength of the change comes from the collective strength of the community as stated by Kotter (2012), “Individuals alone, no matter how competent or charismatic, never have all the assets needed to overcome tradition and inertia” (p. 6), therefore by creating a community of learners with a unified vision they are working towards maintaining urgency and momentum while fighting inertia.

One of the hardest change factors within a school building or system is to maintain the sense of urgency. By developing a coaching-based community each stakeholder has an investment in its success. Leaders should develop the professional community of practice by developing its members as coaches through a systematic process (Williams, 2008). By describing what a coaching culture looks and feels like he provided six characteristics as indicators of successful development. The six elements discussed are: a common, unbiased framework, deep understanding of teacher strengths and beliefs, concrete evidence that influences beliefs, communication and coaching that meet each teacher’s needs, focus on problems that concern the teachers, and deep “Level III” collaboration. Williams (2008) provided scaffolding for leaders of education change which assists leaders during their personal transformation into effective facilitators.
Facilitators must lead by example and equip themselves with team members or change agents that fulfill specific roles throughout the process. Leaders and facilitators must begin by developing various levels of trust with the teachers (Williams, 2008). Change agents need to learn about and become familiar with the roles and responsibilities needed for school change. There are four roles for leaders to effect school change: the process leader, the skills trainer, the resource consultant, and the group energizer (Williams, 2008). Each main role contains three sub-roles that define the identities even further of the process leader, skills trainer, resource consultant, and the group energizer. For the framework in this study, it was beneficial to use the resources provided by Williams (2008) to develop coaching skills and strategies for the facilitator but also a tool to provide turnkey training. Williams’ (2008) research provided relevancy to the leadership structure used for this study. Organizational change is recognized through the need to develop a community in which there is a certain amount of lateral leverage within the team and the staff. “Lewin discovered that those closest to any change must be involved in the change in order for the change to be effective” (Brown, 2006, p. 6).

**Transformative Leadership Theory**

Transformative leadership predominantly provided the focus on how the leader develops trust, and respect from the “followers” (Bass, 1999). This theory is similar to distributed leadership in that the focus is on the interaction rather than the action of the leader (Menon, 2013). The idea behind framing the theory this way is that others are most creative and motivated when there is authentic interaction with the leader. The word transformative is indicative of the expectation for those embedded in this theory, transformation occurs because the “status quo” is not good enough and there is an
intrinsic motivation to improve (Bass and Avolio, 1994). Following the theme of supporting the mission and vision of the organization, it is important to note that all actions are based on the goal of furthering the mission and vision to improve, which in this case, is meeting compliance while improving instruction. Five behaviors of transformational leaders are “attributed idealized influence, idealized influence, inspirational motivation, intellectual stimulation, and individualized consideration” as referred by Bass in 1999 (as cited by Menon, 2013, p.5). Attributed idealized influence is related to the followers’ belief of the leaders’ trustworthiness and the charismatic nature of the leader. Idealized influence is directly correlated to the activities of the leader being morally grounded in values and purpose. Inspirational motivation is the level in which the leader motivates with meaning paired with challenges which may include facilitating a sense of confidence. Encouragement to communicate and even implement new ideas and creativity is what Bass referred to when describing intellectual stimulation. Even in leadership that focuses on the followers or the leaders as a group there needs to be some individual attention shown to each member involved, this is categorized as individual consideration.

**Distributed Leadership Theory**

The literature reviewed regarding distributive leadership theory is expansive for a theory that is relatively new. The term *distributive leadership* was first coined in academia in 1954 by Gibb (as cited in Menon, 2013). Harris and Spillane (2008) shared their research indicating there are many interpretations of the term, distributive leadership, itself. A compilation of the literature suggests that distributive leadership is a form of leadership that runs laterally when making valid decisions in systems. The
predominant emphasis of distributive leadership is not on the leaders’ actions but the focus of the connections that occur as a result of those actions (Harris & Spillane, 2008). The impact of distributive leadership as a capacity building notion to sustain improvement is somewhat in its infant stages of research, however Harris (2004) shared that it is successful and when paired with “social cohesion and trust” it becomes more powerful.

By pooling leadership expertise, there is a capitalization of strengths from the leaders that can be distributed among all. In opposition to some previous leadership theories, distributive leadership spreads the responsibility to others and is not centered only on one particular individual defined as “the” leader. As mentioned before, distributive leadership is a relatively new theory and therefore does not offer the number of studies that examine the effects of this type of leadership on outcomes for students and/or organizations. Currently its popularity is driven by what is happening in schools on an organizational level, as leadership responsibilities are being disseminated among multiple “leaders” in order to enact and sustain change. These leaders are teachers, administrators, central office personnel, personnel from all levels in the educational organization working together to a common goal/vision. The tasks and responsibilities are “distributed” among these key leaders. Another reason for its popularity right now is the response schools have had to the increased demands including accountability for teacher practice and student achievement which has been to reorganize staff and resources for greater gains through collaboration and capitalizing on individual’s collective expertise. According to Harris and Spillane (2008), distributed leadership has
“empirical power” which is becoming more evident as consistent outcomes of
effectiveness are growing within the research community.

Looking at this study, applying distributed leadership poses some very interesting
questions for our organization to consider:

- How is leadership distributed at my school (department)?
- Is this pattern of distribution optimum?
- How is distributed leadership practice developed and enhanced?
- How do you extend leadership distribution to parents, students and the wider
  community?
- What difference is distributed leadership making? (Harris & Spillane, 2008)

As District Z struggles as a school district to meet compliance requirements while
simultaneously building and improving our instructional delivery model, distributed
leadership will assist in the reflection of current leadership roles while answering two
prominent questions in Exceptional Learner Administration: “who is responsible for
Special Education at different levels within a school system and how are leadership tasks
and functions accomplished to support successful learning for all students, especially
those who have disabilities” (Crockett, 2007, p. 140)?

Harris and Spillane (2008) cautioned those moving forward in distributive
leadership. One of the cautions is that the term is not as discreetly defined as it could be
since it’s so young in its inception. There are similarities between distributive leadership
theory with devolved theory, collaborative theory and participative theory. Harris and
Spillane (2008) also shared the limitation of the relationship between the theoretical and
practical interpretations. The question that stands regarding this issue is governed by the
practical interpretation as distributed leadership has not yet been developed enough to
define the “how leadership is distributed” and the question remains is whether or not the
distribution influences effectiveness.

**Special Education Leadership for School Improvement**

The setting of Special Education delivery systems is changing. The Center on
Personnel Studies is taking a leadership role in examining how leadership needs to
change in order to meet the needs of students with disabilities nationwide. The Center is
grant-funded to create a method to address the needs of Special Education systems. This
included the role and availability of administrators in Special Education (Crockett, 2007).
The participants of this project noted the following questions as priorities
(a) how instructional leadership at the district and school levels affects the performance
of teachers and the outcomes of their high and low achieving students; (b) how leadership
preparation and professional development programs affect the capacity of administrators
to meet the needs of all students; (c) how school systems can both attract and retain high
quality teachers and administrators (Crockett, 2007, p. 141).

Boscardin (2007) proposed that a refocus of Special Education administration needs to
fall within the category of distributed leadership where it is a collaborative effort.

Bays and Crockett (2007) conducted a grounded study to examine leadership
practices and their effects on the provision of specially designed instruction for students
with disabilities. Billingsley (2007) also explored the additional component of barriers to
teacher leadership. Application to this study continues to be evident in the development
of a leadership methodology that encompasses organizational structure but also a lens on
improving instructional practices.
Conclusion

Based upon the literature reviewed, it is evident that change is based on a “sense of urgency” to move the change along (Kotter, 2012). The current literature shows that school-based reform is taking place rapidly across the United States. Boards of education are beginning to take a more visibly active role in the leadership of their districts. Even though there may be recognition of the urgency for change, it is a time intensive task and with the current initiatives in education such as evaluation systems, accountability, standardized assessments, and Common Core State Standards it is difficult to have teachers and administrators commit to a new endeavor. In Special Education, “the challenge is to direct system-wide initiatives in ways that redefine leadership as a collaborative effort that supports the use of proven practices to improve the achievement of students with disabilities” (Crockett, 2007, p. 142). In order to implement change, District Z must ensure an appropriate leadership structure and develop communities of practice. The literature demonstrates that the leadership theories to embrace while making a change in administrative roles and responsibilities rests in transformative and distributed theory where the impact yields gains in instructional improvement and student achievement.

It will take a transformative leader who embraces a distributed theory to be able to move the change forward and to sustain the initiative. Support for the development of a new organizational structure will need to be based upon an immediate urgency to meet mandated compliance directives. Protocols and structures will need to be defined and implemented immediately to meet the needs of students in various Special Education
programs. The district will benefit from structures being placed that govern the development of communities of practice who hold the student at the forefront.
CHAPTER 3

METHODOLOGY

How does a Special Education division develop a structure of leadership that “inspires students to become tomorrow’s leaders beyond Academy Field” (Padilla, 2015, p. 9)? The research questions below, frame the study and the lens with which to answer the aforementioned essential question.

- How does distributed and transformative leadership theory impact systems, protocols and procedures in the District Z Exceptional Learners Department?
- What are the perceptions of stakeholders, pre-intervention and post-intervention?
- What protocols and procedures have been developed to ensure movement towards compliance and consistency of practice in the Exceptional Learners Department?

This case study utilized a convergent parallel mixed methods approach using equally weighted qualitative and quantitative data through the use of an embedded design-experimental model. This approach provided the structure to collect and monitor both qualitative and quantitative data simultaneously. During this time there was no analysis of a relationship/correlation between the two types of data. Following the collection of initial data, interventions were implemented to address the re-evaluations that were overdue, the timeliness of initial evaluations and existence of FBAs and BIPs. Data to measure these compliance items were then collected again and were compared to the benchmark data. The analysis of the data and the determined outcomes are reported in Chapter 4.

In addressing the compliance issues of the Exceptional Learners Department, it was important to acknowledge the need to measure multiple points of data. Quantitative
data were incorporated to demonstrate progress towards compliance in the number of re-evaluations completed, the number of initial eligibility determinations completed within the sixty day required time period and the FBA/BIPs including development of a systemic protocol, implementation and monitoring systems. Qualitative data addressed the perceptions of the staff about the effectiveness of the Exceptional Learners Department, their support of the changes occurring and their perceptions of the effectiveness of the systems, procedures and protocols that were implemented throughout the 2015-2016 academic school year.

By analyzing multiple types of data, an understanding of the effectiveness of the interventions was determined. The use of transformative and distributed leadership for change in organizational leadership for the Exceptional Learners Department provided additional literature in the area of administration leadership in Special Education which is currently limited (Billingsley, 2007; Boscardin, 2007; and Crockett, 2007). In order to capitalize efforts in school change it is helpful to know what types of systems, structures and frameworks are successful when developing, repairing or maintaining leadership for Special Education departments in public schools. There is limited research regarding the impact of administrative organizational structure and systems on Special Education student achievement (Crockett, 2007). The organization of the administrative team paired with the structure of support personnel is integral in providing a stabilized system of deliverables to meet the compliance needs of the regulations, both federal and state, as well as the district reporting requirements (Crockett, 2007; ESEA, 2015; IDEA, 2004; NCLB, 2004). Working in a collaborative manner through the implementation of distributed and transformative leadership theory to frame the implementation, each
member was integral in the outcomes of the Exceptional Learners Department. “Through
the work of all, we will achieve inclusive excellence” (Padilla, 2015, p. 9).

A mixed methods design through the vehicle of a descriptive case study
demonstrated the outcomes of organizational change in the Special Education
Department (Baxter & Jack, 2008; Creswell, 2013). It analyzed the process by which the
Exceptional Learners Department transformed itself into an organizational structure
system which aligns to Vision 2020 – The Way Forward (Padilla, 2015; Baxter & Kack,
2008). Using a descriptive case study provided a vehicle to demonstrate the process of
change in the leadership structure. The previous leadership structure was ineffective and
external evaluation prompted interventions by new leadership to create, influence and
sustain protocols and procedures for successful alignment to District Z’s mission and
vision statement. Within the descriptive case study, a mixed methods approach provided
a comprehensive view of the case itself. It is important to remember that the “overall
purpose of descriptive research is to provide a “picture” of a phenomenon as it naturally
occurs, as opposed to studying the effects of the phenomenon or intervention” (Bickman

An embedded design methodology was applied throughout the study to address
the various mixed methods data collection. Multiple sets of data were used throughout the
study. The qualitative data worked in concert with the quantitative data to tell the story.
The qualitative data is supported by the quantitative data, which is integral in the
understanding and interpretation of the results of the study. As demonstrated in Figure
3.1, the qualitative data is measured prior to the intervention at the same time the
quantitative baseline data is gathered. After preliminary baseline data is determined,
intervention occurs, in this particular case study it is the change in leadership and organizational human resource structures. Following the intervention or the change that occurs, post-intervention data are collected both quantitatively and qualitatively. One question that needed to be answered when making decisions regarding this methodology is: would the secondary set of data be useful if not “attached” to the primary qualitative data set? Secondary data is integral to the study but also demonstrates rigorous meaning even without the support of the qualitative data (Creswell, 2011). When designing this study, it was determined that an embedded experimental model would best match this study. The quantitative and qualitative data is the starting point of need for the district. By analyzing the data and discovering the lack of organizational practice and/or functionality, the decision was made to pursue different avenues of organizational structures, including human resources changing. Because the additional data are qualitative in nature, they serve to inform one aspect of the changes occurring and provide opportunities to formatively assess the interventions being put in place and to inform decision making over time. These data also address the overarching research questions.
The collection of qualitative interview data included perceptions provided by interviewees. Interview and survey data was also collected about the culture of each building. The methodology of a single case study approach will guide the study.

**Setting**

District Z is located sixty miles north of Manhattan, New York. It is considered a small city school district and the Hudson River borders it on the east. It currently has 10,988 students registered and is demographically diverse. There is a high population of English Language Learners. There are two high schools, two middle schools, three kindergartens through eighth grade buildings, six elementary (kindergarten through fifth grade), and one pre-kindergarten center.
Currently, the district is out of compliance with 986 (62.09%) students having overdue re-evaluations. What this means is 986 re-evaluations need to be completed in the 2015-2016 school year. These re-evaluations are needed in order to ensure students with disabilities are receiving the appropriate instructional program and supports for their individual needs.

Historically, the Exceptional Learners Department structure has not been able to address the compliance needs of the district. With 1,588 (14.45%) students with identified disabilities kindergarten through grade 12 in the district, there are many implications of students not having current evaluation data. One of the impacts of this amount of students with disabilities is the planning of various programs when projecting the needs for the various programs on the Special Education continuum. Students with disabilities have a right to equitable, public education, defined as a Free and Appropriate Public Education (FAPE), in order to be successful in their lives. It is the responsibility of District Z to provide that for students with disabilities in a public school setting in the least restrictive environment possible to meet their individual needs. One major point is that not all students must receive the same program and/or services; the district is required to provide them with a program which may include appropriate related services that provides an equitable public education. The term related services refers to the provision of speech and language therapy, occupational therapy, physical therapy, counseling, and/or any additional supports needed as defined by evaluations and data regarding the student. The revamping of the leadership structure and the development of formal protocols and procedures has guided the direction of improvement in District Z
which resulted in movement towards compliance while honoring the regulation of educating students in the least restrictive setting.

In order to become compliant with New York State Education Commissioner’s Regulations the district is developing internal systems and leadership changes within the Special Education department. District Z has begun an initiative to address leadership, change and organization in its central office Special Education department configuration to enact swift compliance improvement and expand instructional/program efficiency including instructional delivery systems to increase students with disabilities’ academic achievement. This study, however, is limited in scope to the development of systems, structures and protocols within the school district administrative leadership of the Exceptional Learners Department and the perceptions of four independent elementary schools.

Participants/Sample

The participants of the study are the twenty-three Special Education teachers in four elementary schools (grades k-5), five psychologists, four Supervisors of Special Education, and the Executive Director for Exceptional Learners. The school psychologists, Special Education teachers are from four of the elementary schools. The researcher provides support and is the supervisor of the four buildings; however, the researcher is not responsible for evaluation of the building level participants. The supervisors work directly with the researcher in partnership to enact change and have agreed to participate in the study as has the Executive Director and the Deputy Superintendent. These participants were purposefully selected because of their intimate knowledge of historical processes and procedures including the lack of success within the
department. They are also the stakeholders tasked with improving the state of Special Education in the district. These employees of the district provided the necessary skills; guidance, leadership and participation needed to bring the Exceptional Learners Department of District Z into compliance. All of the participants have a role to play in improvement of the department and the students whose lives will be better because of what they are doing to improve the state of Special Education in the district; therefore, they have agreed to participate in the study as they are change agents during this year.

**Data and Analysis**

Data was collected from varied sources. Quantitative data indicating the number of re-evaluations each psychologist completed was collected monthly from all buildings. This data was analyzed monthly to determine if progress toward the completion of 986 re-evaluations was being made and if an additional intervention was needed to address any delays in becoming compliant. Individualized Education Plan Direct (IEPDirect) reports were run in April to provide quantitative data to indicate if initial evaluations are being completed within 60 days of initial consent as directed by compliance indicators as needing to be 100% compliant. Functional Behavioral Assessment and Behavior Intervention Plan documents were collected and added to each student’s paper file in the Exceptional Learners Department filing closet. The data analyzed in regards to the presence of the FBAs and BIPs in the students’ files were quantitative based upon the individualized education plan indicating an FBA/BIP was needed. The students’ identities were not compromised as the management system was able to run various lists without identifiable information.
A district-wide survey provided to district staff and administration was disseminated electronically in fall 2015. This survey was from the *School-Based Practices Profile: A Self-Assessment Instrument to Guide Effective Inclusive Education Practice* (Stetson, 2003). This survey provided qualitative perceptual data about the current state of the Exceptional Learners Department.

Interviews of psychologists and supervisors included a set of questions developed to gather information about the historical functioning of the Special Education Department. Some questions overlapped, however, since each group has different roles and responsibilities, some clarifying questions were unique to that group. These interviews occurred twice, once in early 2016 and once in April 2016. The purpose was to collect historical perceptual data regarding the functioning of the department prior to the interventions in organization structures and systems and to collect post intervention data following implementation of the newly developed organization structures and systems. The survey data was collected electronically and then organized and coded to establish trends to compare during analysis. The coding system used was NVivo 11 Pro.

Artifact collection occurred throughout the duration of the study. This was the sole responsibility of the researcher to obtain and categorize all artifacts. Artifacts included protocols and procedures developed to increase success of the new organizational structure. These artifacts did not provide specific data; they were the interventions that were implemented in order to address the areas of non-compliance.
Participants’ Rights

The researcher ensured anonymity of responses from the participants during the interviews by assigning a unique number for each interviewee. The data collected regarding number of re-evaluations completed was also anonymous. The goal was to collect information that is not influenced by the researcher’s own opinions and impressions. Individual school names were numbered to identify progress towards compliance without identifying individual school progress. The district-wide survey was collected electronically to ensure anonymity. Interviews were also electronically recorded and coded anonymously through NVivo 11 Pro. Specific feedback and results were not provided to individual schools or participants in order to ensure anonymity and that the data would not be used in an evaluative manner.

Potential Limitations

Potential limitations include working within the researcher’s own organization to study the results of interventions. This limitation was addressed by recusing the researcher from the pool of people surveyed/interviewed and only using four out of the five Supervisors of Special Education. Since the researcher was an employee of the district during the period of 1996 through 2008, she has historical knowledge of the district which may act as a bias towards its most recent identification of non-compliance citations. Upon returning to the district after seven years from an alternate administrative position outside of the district, the researcher was cognizant of her historical biases when collecting, analyzing and reporting the data. The interviews provided qualitative evidence to support the need for change in organizational culture; however, responses may be
biased based upon position and district level experience even though job titles remain the same in each category.

Conflict of interest for conducting a study within the researcher’s organization was carefully addressed. This limitation may not be impactful as the district has already created the sense of urgency needed (Kotter, 2012) for systemic change and the directive from the superintendent to “fix” the department has prevailed (Padilla, 2015) while being fully supported by the board of education.

**Conclusion**

Implementation of interventions and accountability structures for systemic change to influence compliance requirements set forth by regulation demonstrated an impact on District Z’s compliance status. Data collected during this phase provided the specific findings of the study reported in Chapter 4.
CHAPTER 4

RESULTS

The purpose of this descriptive case study (Baxter & Jack, 2008) was to describe and analyze the transformation of organizational structure, systems developed and interventions implemented by District Z’s Exceptional Learners Department. The following questions were used to guide the study: a) How does distributive and transformative leadership theory impact systems protocols and procedures in District Z’s Exceptional Learners Department? b) What are the perceptions of stakeholders, pre-intervention and post-intervention? c) What protocols and procedures have been developed to ensure movement towards compliance and consistency of practice in the Exceptional Learners Department?

Throughout this chapter the researcher will discuss five data points including the number of re-evaluations, the number of initial evaluations completed within the compliance timeline as defined by regulation, the number of student files that contain a functional behavior assessment and a behavior intervention plan as required by the student’s individualized education plan, staff survey data, and interview data. The first data type collected was the number of re-evaluations completed during the length of the study. This data addressed the compliance citation regarding the completion of re-evaluations. Re-evaluations are important in order to monitor achievement of Special Education students and appropriate programs and services to ensure their continuous development. This data included the number of overdue, more than three years since the last evaluation was completed, evaluations. The re-evaluations consist of updated psychological evaluations, educational evaluations, updated social histories and updated
physical examinations. The second data type was the number of initial evaluations completed within the 60-day compliance timeline. Initial evaluations are evaluations completed for a student who is suspected to have a disability. The process consists of multiple steps which culminate in conducting an initial eligibility determination meeting. This meeting must occur within 60 calendar days in order to be compliant. The meeting must have all required evaluations completed to make informed decisions during the meeting. These evaluations consist of a psychological evaluation, an educational evaluation, a classroom observation, a social history, a physical examination and any additional evaluation deemed appropriate or needed such as a speech and language evaluation, occupational therapy evaluation or physical therapy evaluation. This data is collected from the process log in the IEPDirect student management system. Timeliness of initial evaluations ensure that students are identified and receive supports and programs within a timely manner to maximize their achievement. The third data type collected was the number of student files that included the Functional Behavior Assessment and Behavior Intervention Plan documents. New York State regulations state that all students must have these documents in their files if the individualized education plan (IEP) indicates it is needed to address behavioral concerns. Many students had them in various files at the building level, however their permanent file did not contain these required documents. The regulation governing this requirement ensures that all student information used to determine appropriateness of students’ individualized education plan when reviewing the plans and also when developing new plans for students’ achievement and success in education. It also ensures that the documents are present when and if a representative from the New York State Education Department Quality Assurance
Division conducts an audit or review. The fourth data type that was collected consisted of perceptual data response derived from a survey administered. Survey results from School-Based Practices Profile: A Self-Assessment Instrument to Guide Effective Inclusive Education Practices (Stetson & Associates, Inc, 2003) was collected to provide perceptual data of the faculty of the current state of the Special Education Department. These data were collected through an electronic link on the District Z website. Although it was voluntary, building administrators provided encouragement for participation through written request and verbal reminders. Gauging the perception of faculty and staff provided insight to the interventions and planning for increased accountability throughout the study. The fifth and final data type was interview data which also influenced the planning for interventions and accountability throughout the study. Interviews were conducted to gather qualitative data that relates to the perceived effectiveness of transformative and distributive leadership approach of the newly structured Special Education Department administration. Responses also addressed the implementation of the interventions that were established during the case study.

Multiple interventions were implemented and additional progress data was collected in April 2016 to determine the effectiveness of the interventions implementation. These interventions included regularly scheduled team meetings, systemic protocols, consistency of practice, continued accountability monitoring and implementation of consistent language including regular communication.
Analysis Method

Various data collected throughout the study included quantitative data that indicated progress towards addressing the nineteen compliance citations. The data collected included quantitative data that determined the progress towards completion of the re-evaluations towards the district goal of 80% completion. The number of completed re-evaluations was used to determined progress towards the district goal. The second set of quantitative data included data to determine compliance for timeliness of initial evaluations. One hundred ninety-four students process logs were reviewed to determine compliance progress towards 100% compliance. Compliance was determined by the Committee on Special Education meeting the 60-day initial evaluation goal or not meeting this goal. The date of consent started the 60-day countdown and if compliance was met then the initial eligibility determination meeting was held within 60 days. The third data set to determine the effectiveness of the interventions was based in the existence of the Functional Behavioral Assessments and Behavior Intervention Plans in 154 students’ current files. This was determined by reviewing 154 student files whose IEP indicated an FBA/BIP exists and ensuring the documents were present. The researcher reviewed the student files for the incorporation of the required documents.

The fourth data point was collected from a survey disseminated to faculty and staff prior to the implementation of the interventions to gauge perceptions regarding Special Education. Data presented in this dataset is illustrative of only the four elementary schools in which the interviews took place. These data helped to frame the outcomes and analysis of various perceptions during the interventions and set the stage for future study opportunities in those buildings as the Exceptional Learners Department
continues to strive for improvement towards best practice and compliance. Interviews were also conducted to gather additional perceptual data regarding the current state of the Exceptional Learners Department. This data was collected in an environment that provided confidentiality to the participants. There were fourteen participants from the department. The value of this data was to collect qualitative data in regards to the interventions implemented throughout the study to increase areas of compliance.

**Presentation of Results**

Findings are presented in sub-categories of re-evaluations, timeliness of evaluations, existence of FBAs/BIPs,

**Re-evaluations**

Re-evaluations for students with disabilities need to be completed for students with disabilities every three years. This is required by New York State Education Department Commissioner’s Regulations Part 200, which are the regulations that school districts are legally bound to follow in New York State. These re-evaluations consist of an assessment battery of evaluations which is individual to each student. There are two standard evaluations which every student must receive during a re-evaluation, a psychological evaluation and an educational evaluation. To fulfill the requirements set forth by regulation an updated social history and an updated physical examination must also be included in the students’ file. The social history is completed by the parent. The physical examination is usually completed by the student’s personal physician. If a student receives related services such as speech and language therapy, occupational therapy, or physical therapy, those need to be administered and an updated evaluation completed as well. In order to consider a re-evaluation completed for compliance
purposes all of the appropriate evaluations must be completed. For the purposes of this study a completed re-evaluation is only counted as complete when all subparts are completed. The subparts of a re-evaluation include a psychological evaluation, an educational evaluation, an updated social history and an updated physical examination. If all of the components are not present, for data collection purposes it was considered incomplete and non-compliant at the time of the data collection. These data indicated progress towards the goal of completing 80% of the 986 re-evaluations that were due during the 2015-2016 school year. The number of re-evaluations was determined by reviewing a list created in the software IEPDirect (Individualized Education Plan Direct) by the researcher in September 2015 and then again in April 2016. IEPDirect, Individualized Education Plan Direct, is a computer software utilized to track Special Educations students individualized programs, modifications and accommodations in District Z. These data are regularly collected to determine progress and need for interventions throughout the study. The list encompassed all re-evaluations that were indicated by the latest evaluation due date, all dates prior to July 1, 2016. The total number of re-evaluations that are required in order to bring the district back into compliance in order to address the compliance citation for New York State Regulation that addresses re-evaluations was 986. New York State Education Regulations require that re-evaluations for all students with disabilities be re-evaluated at minimum every three years. This re-evaluation includes a psychological evaluation, an educational evaluation, an updated social history, and a physical examination. The significance of this regulation is to guarantee that the most updated achievement and diagnostic information is gathered to create an individualized education plan for each Special Education student
that results in academic, social, emotional and physical progress towards goals which prepare students for success in life.

Data, in the form of a single number determined by complete or incomplete as described above, were collected to indicate progress towards completion of the 986 re-evaluations for the 2015-2016 school year. The Exceptional Learner Department had set a goal in September 2015 to complete 80% (788 re-evaluations) of the 986 re-evaluations that were overdue by July 1, 2016. The goal of 80% was determined by the Exceptional Learners Department to be a reasonable goal to address the large amount of non-compliance over multiple years. This data was collected by each supervisor for their respective buildings. These data were collected through email by the supervisors of Special Education and then provided to the researcher. During the duration of the study which concluded on April 10, 2016, 637 re-evaluations have been completed, 349 were not completed.

This data provided information regarding progress towards the district goal (80% by July 1, 0216). This completion number of 637 or 65% by April 10, 2016 suggested that the district is on target to reach its goal of 80% by July 1, 2016 if progress stays steady. In eight months the district completed 637 re-evaluations towards the 788 re-evaluations needed to be completed by July 1, 2016. One hundred fifty-one re-evaluations are still outstanding in order to reach the July 1, 2016 target. There was an average of 79 re-evaluations completed each month for eight months. Therefore, this data suggested that if re-evaluations continue at the same rate of progress the remaining 151 re-evaluations needed to meet the original target may be completed by the target date of July 1, 2016. The importance of meeting compliance in this area by completing these re-
evaluations is to address the New York State Compliance citations while also addressing the goal set by the Exceptional Learners Department. In the past, compliance in this area had not been a priority and the number of completed re-evaluations per year prior to the study was unable to be determined.

**Timeliness of Initial Evaluations**

To address the area of compliance regarding the timeliness of initial evaluations, the researcher reviewed 194 process logs in the computer management system (IEP Direct). The process logs consist of inputted data that incorporates the dates in which an initial receipt for referral is received and all actions that follow. The first step in an initial request for referral is to log the date received into the process log. It is then that the Supervisor of Special Education creates a consent for the parent/guardian to grant permission to conduct initial evaluations for the student. These evaluations consist of a psychological evaluation, a physical examination, a classroom observation, a social history and an educational evaluation. Other evaluations, such as a speech and language evaluation, occupational therapy evaluation or physical therapy evaluation may be included as needed or requested. Once consent from the parent/guardian was received, it is logged into the process log as well and then support staff generate a “log letter” to send to the schools to distribute to the stakeholders who must evaluate the student. The evaluation reports are then sent to the Exceptional Learner office, logged in the process log and filed in the students file. Once all evaluations are received, an initial eligibility determination meeting is conducted. Data provided information to determine if the Committee on Special Education held a meeting for initial eligibility determination within 60 days of receipt of the referral was collected during the study. The actual data
collected to determine if this compliance requirement was met or not showed that there is still a gap to be closed in meeting compliance within the guidelines of the New York State Education Department. One of the interventions that were implemented during the course of the study was having the Supervisors of Special Education ensure that the initial determination meetings were scheduled within the 60-day timeline. They also ensured that this date was communicated to the buildings, via meeting invitation and email, this communication included the expectation that all evaluations be completed and submitted by the scheduled meeting date by all evaluators, psychologists, teachers, and health office personnel. This is different from previous time periods as the meetings would not be scheduled until after the evaluations were received therefore creating longer timelines that regulatory acceptable.

Compliance data for timeliness of initial evaluations for the school year 2014-2015 was 35.9%. Compliance data for timeliness of initial evaluations for the school year 2015-2016 was 84.4%. This data shows an increase of 48.5% towards 100% compliance for timeliness of evaluations.

The results of this data suggested that the interventions implemented were successful in increasing the rate at which compliance was being met during the 2015-2016 school year in comparison to the 2014-2015 school year. This data also suggested that if these interventions continue the district will continue to move towards 100% compliance for initial evaluations. It also suggested that the new structure of the Exceptional Learners Department within the organization impacted the areas cited for non-compliance by developing the organizational systems and protocols including the
implementation of continuous communication with various staff by supervisors to ensure that tasks were completed and protocols were followed.

**Existence FBA/BIPs**

Data that was collected illustrated the number of Functional Behavioral Assessments/ Behavior Intervention Plans (FBA/BIPs) present in each student’s file. A Functional Behavioral Assessment is an assessment of the function of behavior, that may or may not be disruptive or that may or may not impact the academic achievement of the child, displayed by a student. For example, it defines possible antecedent(s) and possible interventions that may decrease the frequency of the behavior(s). The Behavior Intervention Plan is then developed to provide a plan to decrease and/or replace the undesired behaviors with ones that are less disruptive to the students learning. If the IEP (Individualized Education Plan) stated a student required a functional behavior assessment and behavior intervention plan, then it did exist in the student’s permanent file. The file of each student was reviewed for the inclusion of the FBA/BIP. Of the 156 student files that were reviewed for the documents and of those files it was found that 58% of the files included the FBA/BIP for the 2014-2015 school year. Of the 154 student files reviewed for the documents it was found that 96.6% of the files included the FBA/BIP for the 2015-2016 school year. This suggested that even though students’ files are required to include the FBA/BIP document, not all do. There is no systemic protocol in place for the collection and filing of the FBA/BIP documents in students’ files. The lack of consistency of practice is true in all schools in District Z. It also suggested that the change in the department regarding distributive leadership in organization responsibility as an intervention demonstrates improvement. This is evidenced in the increase of
students files containing these documents. The Supervisors of Special Education ensured that all FBA/BIP documents were acquired and filed in the students’ files. The Supervisors of Special Education communicated to each building to gather the documents and directed the support staff to file them in the appropriate students’ files.

**Survey Results**

One of the interventions during the course of this study was a continuum study. The continuum of Special Education programs is defined as the services and programs provided to students with disabilities which assist them in meeting their achievement goals. The continuum as defined by New York State Education Department consists of consultant teacher services (direct and/or indirect), resource room services, related services, integrated co-teaching services and special class. The Exceptional Learners Department analyzed the current continuum in District Z by reviewing the programs that were offered in each school and at what ages and grades they were offered. Once the programs were reviewed it was found that many programs were only offered for some grades and/or ages in a building. The Exceptional Learners Department uncovered the amount of students attending special classes, classes that were small and only contained Special Education students. The Exceptional Learners Department proposed a movement towards a more inclusive approach to educating students with disabilities with increased time in a classroom with their non-disabled peers. To gauge the readiness of the faculty to embrace the need for a greater number of students to attend classes in a less restrictive classroom a survey was conducted. It also assisted in acquiring perceptual data from the faculties in each building regarding their needs and competencies. The administrative team used the School Based Practices Profile: A Self-Assessment Instrument to Guide
Effective Inclusive Education Practices (Stetson and Associates, Inc., 2003). This survey served to provide perceptions of the faculty in multiple buildings regarding various areas of inclusive education for students with disabilities. The purpose of administering this survey was to gauge all district faculty, not just Special Education faculty, readiness for change while collecting parallel data to inform the continuum blueprint for the 2016-2017 school year. Results collected from the dissemination of a survey from the School-Based Practices Profile: A Self-Assessment Instrument to Guide Effective Inclusive Education Practices (Stetson & Associates, Inc, 2003) to gather preliminary data determining perceptions of the current state of Special Education in District Z provided data regarding the current state of readiness for change in the Exceptional Learners Department. These data were collected through an electronic delivery system on the district website. The participants voluntarily participated in the survey. The building administrators disseminated the request to complete the survey to their faculty. The buildings that were considered for this study had various faculty participation rates. School A had 44 participants which was 100% of their faculty, school B had a 65% participation rate with 15 participants responding, school C had the lowest participation rate at 50% accounting for 13 participating faculty members and school D had a participation rate of 86% with 22 participants. The survey responses are delineated by a selection of the participant either agreeing or disagreeing with the statement. The results reported in this study only include the agree responses as the disagree responses are mutually exclusive and can be assumed as the difference between the agree value and 100%. The survey results provided an overview of faculty perceptions regarding generalities of Special Education. Ninety-four faculty members in the four elementary schools who are the focus of this
study responded to the survey. There were 38 questions distributed through the following sub topics: Collaboration for Planning and Service Delivery, Instructional Strategies for Divers Learners, Early and Effective Interventions, Services in Inclusive Settings, Increased Opportunities for Relationships, Family Involvement in Inclusive Schools and Students Outcomes. The questions build vertically in three tiers of school change processes which Stetson and Associates (2003) delineated as Tier 1 being Initiation, Tier 2 Implementation and Tier 3 as Internalization. The data reported below delineates the number of responses per school and the percentage of respondents who chose “agree” as their perception in response to the statement. All schools charted are elementary school buildings with students in kindergarten through grade 5.

In Table 4.1, the data shown reports the responses of the survey in the area of Collaboration for Planning and Service Delivery. Total number of respondents for each building is labeled and the responses indicated are the percentage of responses that were “agree” with the statements. As indicated, overall percentage of responses were positive as indicated by most areas having “agree” responses above 65%. There were some areas of discrepancy between buildings where in some buildings faculty had a high percentage of agreement with the statements and others did not. The overall area of disagreement across all four buildings was the perception of adequate collaborative planning time in which case the percentages were well below the others comparatively with 50% or less of the participants responding that they agree.
Table 4.1: Survey Section 1

<table>
<thead>
<tr>
<th>Collaboration for Planning and Service Delivery</th>
<th>School A</th>
<th>School B</th>
<th>School C</th>
<th>School D</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total Number of Responses</strong></td>
<td>44</td>
<td>15</td>
<td>13</td>
<td>22</td>
</tr>
<tr>
<td><strong>% Agree</strong></td>
<td>% Agree</td>
<td>% Agree</td>
<td>% Agree</td>
<td>% Agree</td>
</tr>
<tr>
<td>All faculty members feel a strong sense of responsibility for all students, including students with disabilities.</td>
<td>81</td>
<td>100</td>
<td>75</td>
<td>100</td>
</tr>
<tr>
<td>I am knowledgeable of the contents of each student’s IEP for which I have in my classes.</td>
<td>79</td>
<td>100</td>
<td>92</td>
<td>100</td>
</tr>
<tr>
<td>I am confident that together the general and special education teachers and related services in our building can solve almost any problem that might arise regarding quality services for students with disabilities.</td>
<td>71</td>
<td>79</td>
<td>50</td>
<td>68</td>
</tr>
<tr>
<td>General education and special education teachers and related service providers regularly plan together to meet the needs of students with disabilities.</td>
<td>45</td>
<td>93</td>
<td>25</td>
<td>64</td>
</tr>
<tr>
<td>Sufficient time is devoted to collaborative planning regarding the needs of students with disabilities.</td>
<td>36</td>
<td>50</td>
<td>17</td>
<td>41</td>
</tr>
<tr>
<td>Planning team members in our building use available planning time effectively (i.e. arrive on time, bring needed materials, staff focused).</td>
<td>86</td>
<td>86</td>
<td>75</td>
<td>100</td>
</tr>
<tr>
<td>Planning teams regularly experience a high degree of success in addressing issues related to student progress in school.</td>
<td>69</td>
<td>79</td>
<td>58</td>
<td>68</td>
</tr>
<tr>
<td>I have the curriculum I need for the subjects I teach.</td>
<td>83</td>
<td>100</td>
<td>58</td>
<td>86</td>
</tr>
<tr>
<td>I have sufficient teaching materials to address the array of students I teach.</td>
<td>52</td>
<td>92</td>
<td>25</td>
<td>73</td>
</tr>
</tbody>
</table>
Table 4.2 illustrates the results from the second section of the survey. The data here indicates that out of thirteen questions, nine questions were predominantly uniform in responses of agreement with the statements. In question 8, respondents indicate that they are not knowledgeable of IDEA (Individuals with Disabilities Education Act). The percentages indicated by these responses show that there exists a discrepancy between this understanding between the buildings. There is a significant difference in School C’s perception of the students IEP being aligned with the Common Core Learning Standards.

Table 4.2: Survey Section 2

<table>
<thead>
<tr>
<th>Effective Instructional Strategies for Diverse Learners</th>
<th>School A</th>
<th>School B</th>
<th>School C</th>
<th>School D</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Number of Responses</td>
<td>44</td>
<td>15</td>
<td>13</td>
<td>22</td>
</tr>
<tr>
<td>I am knowledgeable of the IDEA requirement to assure access to the general curriculum for students with disabilities.</td>
<td>5%</td>
<td>62%</td>
<td>80%</td>
<td>59%</td>
</tr>
<tr>
<td>The IEP developed for each student with disabilities is aligned to the CCLS.</td>
<td>81%</td>
<td>69%</td>
<td>33%</td>
<td>82%</td>
</tr>
<tr>
<td>Access to the general curriculum is available for students with disabilities, regardless of the instructional setting in which they are taught.</td>
<td>90%</td>
<td>100%</td>
<td>83%</td>
<td>95%</td>
</tr>
<tr>
<td>It is the responsibility of all educators to use instructional accommodations for any student who will be more successful in school because of these accommodations.</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>95%</td>
</tr>
<tr>
<td>I use instructional accommodations for any student who needs them.</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>It is the responsibility of all educators to adapt instruction (change what is taught) as appropriate for any student with disabilities who requires them as stated in the Individualized Education Program (IEP).</td>
<td>98%</td>
<td>100%</td>
<td>100%</td>
<td>100%</td>
</tr>
<tr>
<td>I adapt instruction for students with disabilities as specified in the IEP.</td>
<td>98%</td>
<td>100%</td>
<td>92%</td>
<td>100%</td>
</tr>
<tr>
<td>Statement</td>
<td>Score1</td>
<td>Score2</td>
<td>Score3</td>
<td>Score4</td>
</tr>
<tr>
<td>--------------------------------------------------------------------------</td>
<td>--------</td>
<td>--------</td>
<td>--------</td>
<td>--------</td>
</tr>
<tr>
<td>It is fair and appropriate to adapt grades for students with disabilities as specified in their (IEP).</td>
<td>54</td>
<td>54</td>
<td>83</td>
<td>73</td>
</tr>
<tr>
<td>I modify grades for students with disabilities as specified in their IEP.</td>
<td>46</td>
<td>38</td>
<td>67</td>
<td>64</td>
</tr>
<tr>
<td>The majority of our teachers do not rely on lecture as their primary instructional delivery strategy.</td>
<td>83</td>
<td>85</td>
<td>75</td>
<td>100</td>
</tr>
<tr>
<td>Our school has adopted a school-wide behavioral support model to create a stable, positive learning environment for all students.</td>
<td>85</td>
<td>100</td>
<td>67</td>
<td>77</td>
</tr>
<tr>
<td>Our faculty uses explicit instructional techniques to teach desired behaviors at age-appropriate levels for each grade level.</td>
<td>85</td>
<td>100</td>
<td>58</td>
<td>77</td>
</tr>
<tr>
<td>There is a direct link between effective teaching practices and positive behavioral outcomes for students.</td>
<td>95</td>
<td>100</td>
<td>83</td>
<td>86</td>
</tr>
</tbody>
</table>
Table 4.3 addresses the areas of intervention strategies pre-referral. The perceptions as indicated by the high percentages in most areas that the building faculties agree that their pre-intervention practice are effective with the exception of three anomalies. These areas that are significantly lower are the effectiveness of the RtI (response to intervention) process providing guidance to faculty and the roles of the RtI members being clearly defined including professional development.

Table 4.3: Survey Section 3

<table>
<thead>
<tr>
<th>Early and Effective Intervention Strategies</th>
<th>School A</th>
<th>School B</th>
<th>School C</th>
<th>School D</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Number of Responses</td>
<td>44</td>
<td>15</td>
<td>13</td>
<td>22</td>
</tr>
<tr>
<td>% Agree</td>
<td>% Agree</td>
<td>% Agree</td>
<td>% Agree</td>
<td>% Agree</td>
</tr>
<tr>
<td>The roles and responsibilities of RtI members are clearly defined for team members and for the faculty.</td>
<td>80</td>
<td>62</td>
<td>58</td>
<td>68</td>
</tr>
<tr>
<td>Our RtI process is effective in identifying students who are experiencing difficulty in school.</td>
<td>73</td>
<td>85</td>
<td>75</td>
<td>64</td>
</tr>
<tr>
<td>Our RtI process is effective in providing guidance to teachers regarding interventions, strategies, and programs that positively impact students.</td>
<td>68</td>
<td>77</td>
<td>58</td>
<td>45</td>
</tr>
<tr>
<td>I have received staff development opportunities that effectively addressed my questions relative to the RtI process for our school.</td>
<td>41</td>
<td>69</td>
<td>58</td>
<td>68</td>
</tr>
</tbody>
</table>
Table 4.4 details section four of the survey deals with the inclusive setting for students with disabilities and the perceptions of the buildings. In all but one of these statements the faculties agree with the statements. The one statement that does not have a percentage of agreement greater than 60% is question number 33. This is the question the faculty responded to regarding their perception of whether the students are put into programs in response to the students’ needs or by the availability of the program in District Z.

Table 4.4: Survey Section 4

<table>
<thead>
<tr>
<th>Services in Inclusive Settings</th>
<th>School A</th>
<th>School B</th>
<th>School C</th>
<th>School D</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Number of Responses</td>
<td>44</td>
<td>15</td>
<td>13</td>
<td>22</td>
</tr>
<tr>
<td>% Agree</td>
<td>% Agree</td>
<td>% Agree</td>
<td>% Agree</td>
<td>% Agree</td>
</tr>
<tr>
<td>I think the philosophy of inclusive education practices is valid.</td>
<td>95</td>
<td>92</td>
<td>92</td>
<td>95</td>
</tr>
<tr>
<td>I think that children benefit socially when special education students and general education students learn in the same classroom.</td>
<td>93</td>
<td>100</td>
<td>100</td>
<td>90</td>
</tr>
<tr>
<td>I think that students benefit academically when special education students and general education students learn in the same classroom.</td>
<td>73</td>
<td>92</td>
<td>92</td>
<td>90</td>
</tr>
<tr>
<td>I do not think that the education of general education students suffers when special education students are educated in the same classroom.</td>
<td>68</td>
<td>92</td>
<td>92</td>
<td>90</td>
</tr>
<tr>
<td>Our faculty feels a strong sense of responsibility for the outcomes for all students in our school, including students with disabilities.</td>
<td>98</td>
<td>100</td>
<td>75</td>
<td>100</td>
</tr>
<tr>
<td>I prefer inclusive practices to a pull-out program for special education students.</td>
<td>63</td>
<td>85</td>
<td>83</td>
<td>95</td>
</tr>
<tr>
<td>If I were the parent of a special education child, I would want him to be educated in an inclusive classroom.</td>
<td>93</td>
<td>85</td>
<td>92</td>
<td>86</td>
</tr>
</tbody>
</table>
The service delivery models for students with disabilities in our school are solely determined on the basis of individual student needs and not on the basis of labels or on which services are currently available.
Table 4.5 addresses the need for self-advocacy and social emotional growth of students with disabilities in District Z. The results show us that inclusive practices are providing our students with disabilities a “sense of belonging”, however, the data demonstrate that faculty disagree that students are taught their learning characteristics nor is do they have the ability to discuss their disability as indicated by low percentages in those areas.

Table 4.5: Survey Section 5

<table>
<thead>
<tr>
<th>Increased Social Opportunities, Relationships, and Self-Advocacy Skills</th>
<th>School A</th>
<th>School B</th>
<th>School C</th>
<th>School D</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Number of Responses</td>
<td>44</td>
<td>15</td>
<td>13</td>
<td>22</td>
</tr>
<tr>
<td>% Agree</td>
<td>% Agree</td>
<td>% Agree</td>
<td>% Agree</td>
<td></td>
</tr>
<tr>
<td>I believe that inclusive education practices increase a “sense of belonging” for all students in our school.</td>
<td>93</td>
<td>92</td>
<td>92</td>
<td>90</td>
</tr>
<tr>
<td>Our faculty uses explicit instructional techniques to foster positive peer relationships.</td>
<td>88</td>
<td>100</td>
<td>67</td>
<td>85</td>
</tr>
<tr>
<td>Students with disabilities in our school are taught to identify their learning styles and to understand the implications of their learner characteristics.</td>
<td>54</td>
<td>62</td>
<td>25</td>
<td>90</td>
</tr>
<tr>
<td>Students with disabilities in our school are provided the skills to discuss their disability with others and to discuss what their disability may mean to others in a school or work environment.</td>
<td>46</td>
<td>46</td>
<td>17</td>
<td>55</td>
</tr>
</tbody>
</table>
The data collected through the survey of faculty and staff of the four elementary buildings suggested that while District Z’s main focus was on compliance, it is important to note the perception of the staff/faculty in each building during the change process. It provided insight to the level of awareness each building perceived as being the areas of strengths and needs. This data provided information to the Exceptional Learners Department in order to design and implement interventions to address areas of need and gaps that arose from the survey. It provided information that informed supervisors which buildings needed support throughout the change process during the year. Using this data assisted in determining the specific interventions that were designed and implemented during the course of the study to increase compliance.

**Interview Results**

The participants included in the interview portion of the study were four psychologists of four different elementary school buildings, five support staff with more than one year working in the Special Education Department, the Executive Director of Exceptional Learners and four Supervisors of Special Education. Interview participants signed consent forms prior to participation. The four psychologists were purposefully selected because they were stakeholders implementing some of the interventions, were building based and were instrumental as communication conduits between the Special Education Department, located at central office, and the building faculty and staffs. The support staff were chosen as participants for their view and expertise of prior systems or lack of systems, their experience over their time in the Exceptional Learners Department with various leaders including procedures and protocols. The support staff was also seen as an important population to interview for this study since they also communicate with
all stakeholders including parents, teachers, administrators and the staff of the Exceptional Learners Department and could provide various perspectives of the constituencies with which they speak regularly. The Supervisors of Special Education and the Executive Director were included in this population as well because they were designing, implementing and enforcing the interventions during the time of the study and were able to provide valuable information regarding progress towards compliance.

The interviews provided qualitative data to frame the perception of variables that were important to school improvement and organizational change. This included anecdotal data surrounding communication before and after the implementation of the interventions. This data was used to determine where improvement was still needed to meet compliance goals and indicate what interventions needed to be created, implemented and sustained.

Of the fourteen participants, five were support staff (secretaries), four were building level psychologists, four were supervisors of Special Education and one was the Executive Director of Exceptional Learners. The interview times ranged from twenty minutes to thirty minutes depending upon the responses of the participants and included twenty questions (See Appendix E). The interviews were conducted in a private location and recorded using an application called Rev Voice Recorder. The application Rev Voice Recorder, recorded the questions as stated by the researcher and the responses as stated by the participants. The audio transcription was then uploaded through the application and transcribed into a word document to be used by the researcher. The completed transcriptions were compared to the voice recording by the researcher to ensure accuracy.
The interview participants reviewed the transcripts for accuracy and returned them to the researcher.

The participants were assigned a number to protect their identities during the coding process. Transcriptions were analyzed and coded using NVivo 11 Pro computer software. NVivo Pro 11 is a computer program used to code qualitative data on multiple levels. It is designed to assist with text based coding and mixed methods research. Coding of the interviews was executed by identifying the frequency of various words on the first level. The high frequency words that emerged were then coded into nodes (topical accounts of words and their synonyms). Once the first level of nodes was identified and secondary level of coding occurred to drill deeper into specific characteristics found within the interview data. Once the words with the most frequency were identified they were then grouped into themes. These themes were then developed into nodes and analyzed by the researcher. Secondary level of coding occurred to drill deeper into specific characteristics found within the interview data. The analysis of the emerging themes from the first level of coding were then grouped into themes that defined the characteristics of the first level of themes. These areas became the reported on themes and described in the following paragraphs and divided into pre intervention data and post intervention data.

Themes were defined as recurring concepts in the interviews developed from the coding process and various queries of key words. The same themes emerged during pre and post intervention through the interview coding process with the exception of an additional theme post intervention of internal district accountability. During the interviews there were three major themes that emerged: communication, systemic
protocols/procedures and accountability. From these themes, each had two sub themes that appeared. Communication led to the subthemes of morale and feeling valued, within the theme of systemic protocols/procedures incorporated the need for less questions and consistent expectations; and in the themes of accountability, morale arose again as a sub theme as well as confidence.

**Communication**

One of the major themes derived from the coding of responses during the interviews of fourteen participants was communication regularity. The following paragraphs are organized to discuss pre-intervention responses which indicated the lack of consistent communication in the first section and the second section addresses the post- intervention response in which the data suggests positive change in communication.

The perceptions of the participants prior to the interventions, including before the change of administration structure, indicated that there was little and inconsistent communication between the central office Special Education staff, the chair people and the teachers. All fourteen participants responded that communication impacted the function of the department and had overarching impact on various areas of both functionality and compliance. Six participants indicated that communication did exist but it was not efficient and was “sporadic at best” as reported by participant three. Three participants interviewed stated that responses were only received when they repeatedly initiated communication themselves regarding the same concern or topic. Participant four was quoted as saying, “the squeaky wheel gets the oil”. Participant six shared that responses to many emails were only provided after multiple attempts to gather the information requested. Participant seven stated, “I would email administration four or
five times before I would even get a response that it had been received. Sometimes I would even have to utilize the ‘read receipt’ option in my emails.” This suggests that there was a lack of trust that communications, specifically emails were not being read in a timely fashion or even at all. By selecting the ‘read receipt’ option when sending emails, the sender was able to determine if the recipient read the email that was sent.

Communication also impacted the implementation of various procedures and protocols which is supported in this quote by participant one, Difficulties getting in touch with people at the higher level. Sometimes getting different answers to the same question. There were times when supervisory staff were hired who didn't know anything about Special Education and couldn't give us answers that we needed, never got back to us. Communication was a huge piece.

Post intervention data from the interviews demonstrated differences in some responses. Thirteen out of fourteen participants responded that communication has improved since the change in administrative structure. Participant seven stated, “From the very beginning [of the administration change], even before school started, the amount of communication that was going on was far above what I was used to in the building.” Two participants had a difference of opinion in this area. These two interviewees were members of the support staff. The two participants provided data that there is still a lack of communication for the support/secretarial staff even if there was some improvement, they believe that there is still a gap in communication. Participant six stated, “We feel like we get the information second hand or after things are already in motion.” Participant four provided the feedback that it, “feels like it never gets to the support staff” and in reference to an intervention that was implemented also commented, “I think we didn't
meet enough after the first few months, in the beginning we met regularly, but once we got busier, our regular meetings were pushed to the side.” Participant seven responded that communication as a whole has been better and is quoted by saying, “been a lot better communication from special ed [education department], communicating and keeping me in the loop.”

One of the sub-themes of communication was morale. Eight participants used the term morale which was repeated twenty-seven times during their interview when discussing communication. It was communicated that the increase in communication impacted the morale of the department. During pre-intervention one participant provided the following statement, “moral in general regarding the Special Education department in the district was very low.” Participant ten responded that she felt more supported and evidenced by the statement, “we're getting a lot of support and help from you guys as well.” Various other statements made by participants also supported the increase in morale since the organizational change. Participant five responded, “I'm sure hoping [improvement and communication continues] and this year, I'm feeling more confident.” Participant thirteen shared, “I feel like I’m still supported.” Participant two shared the following quote which communicates the differences between pre-intervention and post-intervention, “The atmosphere immediately before July 1 was pretty dim because it just wasn't really a good time for morale or anything.” And participant one provided the following statement to corroborate the sentiments of participant two, “I think that morale is better. Before we all felt like it's just hopeless. That, speaking for myself anyway, I feel like that's better.”
Systemic Protocols/Procedures

The second major theme that emerged during the interview coding as participants specifically addressed the protocols and procedures. Twelve out of fourteen participants referenced that protocols and procedures were not systemically implemented prior to the study implementation. Two participants stated that there were protocols and procedures in place at various times historically, however with administrative/personnel change they were not consistently communicated, disseminated or implemented.

With the implementation of the interventions, participants shared that they had less questions regarding procedures and protocols due to increased communication and support from the Supervisors of Special Education. Also as a sub-theme, participants communicated through the interview process that having the protocols and procedures created a consistent expectation from the department. The main focus being compliance citations, cause the participants to work together and support each other to meet consistent and communicated expectations.

Prior to the interventions, “Everything was basically done on a case by case basis” as stated by participant three during the interviews. Participant six shared that, We did have well established systems when [a previous director] was here. We continue to use those systems under [the next director], she didn't really change anything. Then, when [a third director] joined us, the assumption was we had no systems so there were comments and attempts made to change things what we had, or to implement things that we had already been doing, but the assumption was we weren't doing them. In regards to the specific protocols for re-evaluation meetings participant twelve stated, “for initials or re-evaluations with the process in the district, there really was not
process.” Two participants cited that the buildings “many times did their own things” or “kind of had their own way of doing it” and had to reach out “to my other fellow school psychologists, and ask, What’s the protocol for this, or, What’s the protocol for that?”

When addressing the same question, post intervention, eleven out of fourteen participants shared that there has been an increase in consistency of practice throughout the buildings and the department. There were still some statements that demonstrated further work needed to be done in protocol development. Participant nine stated that a “more systemic attempt or success in regards to communication as far as protocols, procedures, or solidification has taken place in recent months.” Participant two shared that the implementation and communication of systemic protocols has demonstrated success as evidence by his statement, “I've seen a lot of attempt and I've seen success as well with it.” Participant six stated that she is “starting to see more of a mainstream in protocols and procedures” and “now they are trying to make it more cohesive across the whole district.”

One of the main research questions specifically addresses the need to meet compliance as derived by NYSED, participant two specifically addressed the extent that the implementation of systemic protocols has impacted the regulations as evidenced in this quote, “I have seen protocols be put in place where we're following the regulatory guidelines to a much better extent than they ever were, and we're doing that across the board.” Participant nine also shared that the new administration has “kept the foundations of what is compliant and just built on it and made sure it rolled out.”

For another participant, the feeling was that as the protocols and procedures were developed, they were not communicated as thoroughly as others have shared. This
statement is supported by the quote from participant fourteen, “procedures that we were going to try to implement with those that I haven't seen in place or not everybody is still on the same page with them.” There is also still some hesitation in the presence of change as demonstrated by participant fourteen also stating, “I think some people are a little leery of some of the new practices, myself included.”

**Accountability**

The third theme emerged through the coding process was accountability. Participants used the term accountable specifically throughout the interviews 26 times and synonyms of accountable 16 times, i.e.: responsible, liable. The data collected demonstrated a lack of accountability from the department administration pre-intervention. Participant one stated, “they [psychologists, administration] didn’t take responsibility for a lot of things.” Participant eleven shared, “they [psychologists] weren’t reigned in too tight at that time, therefore leading to work not getting done and missing compliance targets.” During the pre-intervention interviews the common response was that those who were responsible for re-evaluations or initial evaluations were not being held accountable that “the testing just got done or it didn’t get done and that was the end of it” as quoted by participant three. Participant four stated that “they were never really held accountable. [Administration] tried, but never really went too far.”

Post-intervention interviews revealed a different data set in regards to accountability. The data suggests that personnel are now being held accountable to be compliant and regulatory by the department. This data includes various statements from participants in the interview process that supports the added level of accountability for being compliant. Participant one stated, “we’re being held accountable to what is needed
and now, it’s, ‘hey, it’s not here. Why?’, it’s not just why once and then we forget about it or nobody takes responsibility for it, now that’s changed.” With the focus on the 60-day timeline for compliance, participant fourteen stated, “We’re being held accountable for what we need, what the psychologists need to be in compliance and get everything out promptly.”

This data suggests that having a system of accountability was a successful intervention. By providing support and accountability there appears to be success in moving towards compliance.

**Interventions Implemented During the Study**

The Exceptional Learners Department administrative team put into place multiple interventions during the time of the study. The administrative team developed multiple forms to be used systemically during committee on Special Education meetings. The administrative team strategically assigned Special Education student and building responsibilities between the Supervisors of Special Education (see Table 4.6). The Exceptional Leaners Department developed a Board of Education Committee which consisted of two Board of Education members, Deputy Superintendent, Executive Director of Exceptional Learners, all five Supervisors of Special Education, speech and language pathologist, school psychologist, parent advocate, two Behavior Specialists, Director of Pupil Personnel Services, and one Response to Intervention Specialist and parent advocate. This committee assisted and guided recommendations from the continuum study to the Board of Education for the 20106-2017 school year.

The behavioral specialists in the district developed Functional Behavior Assessment and Behavior Intervention Plan protocols. Building faculty meetings were
held prior to annual reviews beginning which included communication to use the forms that were developed. Regular staff meetings were scheduled weekly to ensure support staff and administrative staff were ensuring systemic implementation of protocols and procedures. Protocol development sessions were held to develop systemic protocols and record protocols that were in existence.

Supervisors and the Executive Director convened meetings on Monday mornings and Friday afternoons to review progress towards compliance goals, ensure systemic protocols were being implemented and included debriefing of difficult cases or to problem solve. Monthly meetings with the Deputy Superintendent also occurred. Regular meetings with psychologists occurred with their respective supervisors. Monthly reporting out of psychologist progress toward yearly goal of 55 re-evaluations in order to meet compliance. An additional full time and a half time psychologist was hired to assist with coverage for psychologists who needed extended leave and to complete additional re-evaluations.

Table 4.6: Strategic Distribution

<table>
<thead>
<tr>
<th>Supervisor</th>
<th>School A</th>
<th>School B</th>
<th>School D</th>
<th>School E</th>
<th>OOD* School A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supervisor A</td>
<td>School A</td>
<td>School B</td>
<td>School D</td>
<td>School E</td>
<td>OOD* School A</td>
</tr>
<tr>
<td>Supervisor B</td>
<td>School F</td>
<td>School G</td>
<td>OOD* School B</td>
<td>School A</td>
<td>School B</td>
</tr>
<tr>
<td>Supervisor C</td>
<td>School H</td>
<td>School I</td>
<td>OOD* School C</td>
<td>School D</td>
<td></td>
</tr>
<tr>
<td>Supervisor D</td>
<td>School J</td>
<td>School K</td>
<td>School L</td>
<td>OOD* School D</td>
<td>School E</td>
</tr>
<tr>
<td>Supervisor E</td>
<td>School M</td>
<td>School N</td>
<td>OOD* School E</td>
<td>OOD* School F</td>
<td></td>
</tr>
</tbody>
</table>

*OOD: Out of District School, such as a day or residential placement
Conclusion

The purpose of this descriptive case study (Baxter & Jack, 2008) was to describe the transformation of both organizational structure and systems development by the District Z Exceptional Learners Department. The five data types suggested that progress has been made in moving closer to resolving compliance citations in the areas of re-evaluation completion, timeliness of initial evaluations, presence of Functional Behavior Assessments and Behavior Intervention Plans in students’ files. Systems protocols were developed in order to facilitate change which the data suggests have made an improvement to support progress towards meeting compliance citations. The data suggests that using a transformative and distributive leadership model, school improvement may occur when working to meet compliance. Interpretation of the implications of the collected data, both qualitative and quantitative will be discussed in Chapter 5.
CHAPTER 5
CONCLUSIONS, IMPLICATIONS, FINDINGS

The purpose of this case study was to describe the transformation of both the organizational structure and systems developed by the Exceptional Learners Department prompted by the negative compliance citations as determined by New York State Education Department. This descriptive case study was a mixed methods research design that demonstrated connections between relationships in which an experiment is conducted. In this case study interventions were put into place to address three areas of non-compliance. The current state of District Z was measured prior to the interventions and then reviewed post intervention.

In recent years District Z has met with many challenges in meeting the compliance mandates in various indicators resulting in nineteen compliance citations. These compliance citations (See Appendix A) are indicative of the district’s inability to meet regulatory compliance indicators of which there are twenty-two. Through these citations and directives of corrective actions as documented by New York State Department of Education, a sense of urgency was created which also created a momentum for systemic change. The urgency created by New York State Education Department through the identification of the citations of non-compliance increased the fervor with which District Z addressed the systemic changes and leadership focus. This needed to occur to prevent further corrective action from the New York State Education Department in the form of fiscal redaction. This study addressed three main indicators of compliance while gathering data to address the following research questions:
• How does distributed and transformative leadership theory impact systems, protocols and procedures in the NESCD Exceptional Learners Department?
• What are the perceptions of stakeholders, pre-intervention and post-intervention?
• What protocols and procedures have been developed to ensure movement towards compliance and consistency of practice in the Exceptional Learners Department?

The three areas of compliance addressed throughout this study were the need to address the progress towards completion of 80% of the 986 re-evaluations (788) by July 1, 2016; ability to complete initial evaluations within the 60-day timeline; and the presence of FBA/BIP documents in students’ permanent files when the IEP indicated that one exists.

The outcomes of the interventions including the implementation of systemic protocols and procedures were paired with systems of accountability throughout the study. All personnel used the developed procedures and protocols provided data for an analysis of the impact of these intervention on areas of non-compliance.

During the course of this study, the Exceptional Learners Department underwent a dramatic change in leadership and structure. Systems change under the leadership of the Executive Director for Exceptional Learners facilitated the changes throughout the study. Changes in structure began as a developed sense of urgency to meet compliance as imparted on District Z by the New York State Education Department. The Superintendent and Board of Education determined that this was an urgent matter that needed to be addressed fully. Fullan (2001) and Kotter (2012) both ascertained that the first step in creating lasting change is the development of a sense of urgency. The Superintendent, in his goal to enact improvement district wide over the course of 2015 through 2020, created a committee to develop a strategic plan for district wide improvement. The
committee contained representatives from all stakeholder groups. The process was led by the superintendent. The committee developed a mission statement and a vision statement in the beginning after determining a need and urgency for district wide improvement for student learning. After the development of the mission and vision statement, the committee developed the pillars and quality indicators in which to monitor improvement in both a formative and summative way. The document outlined the district mission and vision statements, which are considered integral parts of successful systemic change by both Fullan (2001) and Kotter (2012).

The Exceptional Learners Department ensured that they incorporated the ideals of Vision 2020-The Way Forward (Padilla, 2015). In this strategic plan, the Exceptional Learners Department embraced the Core Vision 2020-The Way Forward, which includes pillars of strategic improvement in five areas: District-Wide Systems, Effective Leadership, Educational Equity & Excellence, Family & Community Engagement, and Supportive Learning Environment (Padilla, 2015). Ensuring these pillars were consciously considered in the development and implementation of the interventions while being reflective, continuously reviewing and refining throughout the change process (Fullan, 2001). Planning and development assisted in demonstrating and supporting a continued philosophical alignment for departmental improvement. The pillars articulated the core values the newly structured Exceptional Learners Department stood by: Nurturing, Empowerment, Collaborative, Student-centered and Diverse (Padilla, 2015).

Over the course of the study, the Exceptional Learner Department, was able to begin to repair relationships by “setting clear standards, expecting the best, paying attention, personalizing recognition, celebrating together and setting the example”
(Kouzes and Posner, 1998, p.18). The Supervisors of Special Education grew their own team relationships with these guidelines and distributed these expectations within each of their buildings to begin to rebuild trust with the Exceptional Learners Department. Utilizing distributive leadership theory, the leadership team was able to develop relationships and make decisions that focus on the connections that are made as a result of the decisions and create a buy in to the decision from those connections Harris & Spillane, 2008).

**Interpretations of Findings**

The researcher attempted to present the interpretations of findings by relating them directly to the research questions, however, it is important to note that many data points address more than one research question and cannot be described in complete isolation for other research questions. The researcher disseminated the findings categorically.

**Research Question 1: How does distributive and transformative leadership theory impact systems protocols and procedures in the District Z Exceptional Learners Department?**

Using a shared model of distributed and transformative leadership theory, the Exceptional Learners Department developed systems and effective leadership to bring the district closer to meeting compliance while reaching for educational equity and excellence for all students (Menon, 2013). The development and implementation of systemic protocols and procedures addresses this research question. This research question was also addressed by the reorganization of the department personnel and the ability to implement the interventions. The data collected to address this question was
embedded in the interview responses and the implementation and existence of the actual protocols and forms developed.

The Executive Director of Exceptional Learners ensured that the supervisors were provided with the authority to be able to implement interventions that addressed compliance citations. New York State Department of Education has cited District Z with nineteen compliance citations, these citations are areas in which District Z are not meeting compliance regulations as defined by Part 200 of the Commissioner’s Regulations for Special Education students. The administrative team, supervisors and Executive Director of Exceptional Learners, developed forms that instilled universal protocols for various components of Special Education processes.

The supervisors paired transformative leadership with distributed accountability to develop and monitor progress both quantitatively and qualitatively throughout the study to develop collaborative communities and develop accountability among stakeholders. The supervisors accomplished this by continuing to ensure that all new forms developed were being implemented regularly and across all buildings.

Protocols for scheduling initial evaluations were implemented in each building and each supervisor provided follow up throughout the initial evaluation period to ensure the initial eligibility meeting would be scheduled during the 60-day required timeline. Supervisors and support staff kept spreadsheets of information required to determine readiness of initial eligibility determination meetings. The supervisor would then schedule the meeting within the 60-day timeframe. The use of distributed accountability provided the supervisor the means to utilize the various stakeholders to complete their tasks in the allotted timeframe to meet compliance standards.
This is specifically suggested in the quantitative data collected regarding the completion of the re-evaluations, completing initial evaluations and determination meetings within the 60-day compliance timeline, and ensuring that the appropriate FBA/BIP documents are present in the students’ files. The department utilized the theory of action shared in Vision 2020 – The Way Forward, the Exceptional Learners Department made the commitment to “cultivate collaborative communities that generate input from all levels of the organization on issues related to instructional practice and student learning” (Padilla, 2015, p. 8). It led to the “shared purpose and vision for our work leading to more effective practice” (Padilla, 2015, p. 8).

Developing and sustaining systems, structures and protocols for the Special Education department in order to facilitate the successful achievement of the Special Education department goals was measured by the quantitative data of compliance and the qualitative data collected from the interviews to specifically address the three aforementioned compliance areas and research questions.

The use of transformative theory of leadership provided the school district with the structure of a theory that provides focus on the interaction of the leaders rather than only on the action itself (Menon, 2013). Menon (2013) suggested that real change and transformation cannot happen within the action itself but the relationship of one action to another, therefore transforming leadership. This was demonstrated by the applied systems protocols and accountability of their implementation. This is evidenced throughout the interviews that took place pre and post intervention. The responses showed a definitive difference in support of the protocols that were put in place including the increase in communication. The transformation that gained momentum during this study has
impacted the results, six interview participants shared that with the increase of communication and the new supervisory staff, the feeling of everyone being an integral part of a team drives the motivation to be successful.

Distributive leadership theory is the idea that all parts work together with each other in concert by not duplicating actions or resources while being able to trust the other leaders are doing what needs to be done in conjunction with a mutually agreed upon outcome (Harris & Spillane, 2008). The Exceptional Learners Department demonstrated this effort by demonstrating the teamwork needed to develop and implement the interventions as evidenced by the actual protocols developed. The supervisors worked as a team to implement these forms and protocols district wide in all schools. Regular meetings took place two times a week for the supervisors and the Executive Director to review progress toward goals, trouble shoot various obstacles that arose and to share department expectations. This was communicated to the researcher throughout the interview process and the researcher was part of the meetings as the researcher was one of the supervisors. Table 6 located on page 82 show the division of responsibility among supervisors.

The supervisors’ responsibility was divided strategically to be able to address all buildings and students with disabilities. This division of responsibility was purposeful and strategic in order to provide appropriate administrative coverage and equity among the leadership. This made distributive leadership more effective as the supervisors were then able to utilize their responsibility and carry out the implementation of the interventions.
Research Question 2: What are the perceptions of stakeholders, pre-intervention and post-intervention?

Using the survey data and the interview data the perceptions of the stakeholders demonstrated a change throughout the study. Prior to the interventions, the responses demonstrated a disorganization of protocols. Some participants believed there were protocols in place and others were unsure. Participants also stated that even if there were protocols in place, they were not enforced or universal in application. Those who were responsible for completing various tasks in relation to compliance found there was little communication and follow through in regards to accountability. They believed that accountability was inconsistent at best.

Through the course of the study it was interpreted from the data that communication has improved and it became more regular which related to the new sense of confidence in the department with a more positive sense of morale. The interview responses demonstrated that various stakeholders were being held more accountable which led to more systemic implementation of the protocols and other interventions.

The supervisors continuously monitored the progress of the implementation of the new and/or adapted protocols and procedures. Through this monitoring, accountability was demonstrated with follow up from supervisors to the various psychologists in their buildings. Supervisors emailed their psychologists monthly to continuously monitor the progress towards the re-evaluation goals. The supervisors were also able to hold the appropriate staff accountable throughout the length of the study through the distributive leadership model. The Superintendent, Deputy Superintendent and the Executive Director of Exceptional Learners provided the Supervisors of Special Education with the
autonomy to implement and communicate to various staff and faculty expectations to meet all areas of compliance and implement the interventions. The supervisors held appropriate staff accountable by requesting updates monthly, meeting with the psychologists and monitoring progress towards areas of compliance. The areas of compliance that were specifically monitored included the timeliness of initial evaluations, completion of re-evaluations, and existence of functional behavior assessments and behavior intervention plans in student files. The Superintendent, Deputy Superintendent and Executive Director of Exceptional Learners conducted monthly meeting with the Supervisors of Special Education to ensure progress was being made, develop protocols and procedures, receive updated information of progress towards rectifying the compliance citations.

**Research Question 3: What protocols and procedures have been developed to ensure movement towards compliance and consistency of practice in the Exceptional Learners Department?**

It was determined that there were various protocols and procedures in existence at the start of the study, the disconnect was systemic implementation. During the course of the study various protocols have been refined and developed to influence the movement toward compliance. Communication and accountability throughout the implementation of the interventions and systemic application of the protocols have been successful during the period of the study in moving District Z towards compliance. This was evidenced in the progress made towards meeting compliance throughout the length of the study.

Protocols were developed and implemented systemically by the stakeholders. This initiative was led by the supervisors and implemented in each of the buildings. The forms
developed were adopted uniformly throughout the district. Some forms were minor revisions of existing ones such as the sign in sheet for committee on Special Education meetings. Other forms provided deeper documentation of various processes or requests for students with disabilities. These forms, such as the request for a one to one teaching assistant provided opportunity for the chairperson or supervisor to justify the need for this service. Without this justification the determination of need becomes subjective. The need for this form is to reduce the need to for teaching assistants unless the students’ disability requires it not just as a helper in the classroom for the teacher. This would also honor the regulation that stated the student must be provided a free and appropriate education in the least restrictive environment. Providing a one to one assistant is a very restrictive situation since the ratio is so small as per New York State Education Regulations.

The protocols and procedures that were developed fostered a unity across the Exceptional Learner Department for all stakeholders. This is evident as well in the interview responses specifically talking about morale and increased communication. Participant 5 also stated, “we feel like a team, we want to make things better, do good work for our supervisor.”

**Implications and Recommendations**

One major implication derived from this study is the need for additional information to be disseminated to various stakeholders in District Z. Professional development for these stakeholders in multiple forms: job-embedded, coaching, after school and summer workshops, turnkey training, and conference day professional development is needed in multiple areas and will be beneficial. Professional development
to communicate the Special Education process, IDEA, NYS regulations, specific district 
protocols are just a few areas that are needed based upon the findings of the research.

Recommendations for continued progress towards continuous and sustainable 
compliance are:

- Continued development and fidelity of systemic implementation of protocols and 
  procedures
- Continued accountability for all stakeholders
- Sustained systems of communication throughout the system
- Development and implementation of a systemic process for general education 
  support for struggling students prior to referral in the form of Response to 
  Intervention
- Development of an annual protocol to ensure re-evaluation accountability
- Professional Development for all stakeholders
- Increased regular communication/outreach with parents

**Recommendations for Further Study**

Research on administrative structures in Special Education is not prevalent in 
current research. Effective structures for Special Education departments within school 
districts is needed as the demands for compliance and achievement increase. There is a 
plethora of research governing organizational structures both in business and education 
presented in generalities, however, the Special Education arena, there is very little about 
the connections between leadership and compliance. There exists research that discusses 
effective school improvement theories and systems sustainability, however, a gap exists 
in addressing specific Special Education school improvement and sustainability.
Another opportunity to extend this research is to study the effects of administrative structures on instructional practices and student achievement. Looking at the effects the administration has on instructional practices in the classroom could have widespread implications across all environments.

Replicating this research in other districts who have similar compliance needs would also be an additional area of research to determine the applicability of the changes made in District Z to other districts.

**Conclusion**

Being cited by the New York State Education Department for nineteen areas of non-compliance has propelled District Z to take immediate and intensive action towards rectifying these areas. This action took the form of change in organizational structure of the Exceptional Learners Department. This structural change included creating three additional administrative positions, Supervisors of Special Education, and decreasing by three Committee on Special Education chair people positions. Within the new structure of personnel, accountability for developed protocols, procedures and consistency of practice were implemented. These interventions were implemented to address specific compliance citations. The literature regarding organizational change reflects a common thread throughout all researchers that a sense of urgency needs to be established when beginning any change endeavor. In all change processes there is a path of change that is traveled. In this study, the path demonstrated progress, the difficult part that occurs now is the sustainability of this change.
This study provided research in the effectiveness of the interventions to address compliance for District Z. While there is still room for improvement and continued focus on compliance and sustainability the results demonstrated that progress has been made. The progress made is evidenced in the number of re-evaluations completed and the percentage of initial evaluations completed in the 60-day timeline for meeting to determine eligibility as well as the presence of FBA/BIP documents in students’ files. The protocols and forms created that were implemented systemically and enforced through a distributed leadership style of accountability also continued to the progress made towards full compliance.

Qualitative data assisted in defining the mindset pre and post intervention which set the playing field for transformative leadership to be used to implement change. Transformative leadership predominantly provides the focus on how the leader develops trust, and respect from the “followers” (Bass, 1999). The data from the interviews supported a sense of trust and respect have been developed during the implementation of the interventions. The responsibility of the interventions has been distributed among the leadership and those leaders have been held accountable. During which time progress towards compliance has been made. Transformation occurred because the “status quo” was not good enough and there was an intrinsic motivation to improve (Bass & Avolio, 1994).

Leadership responsibilities were being disseminated among multiple “leaders” in order to enact and sustain change. In this case the responsibilities were disseminated among the supervisors who then in turn empowered the psychologists to implement the interventions. This is indicative of distributed leadership, which capitalizes on the
leaders’ strengths and is developed around the mission and vision of District Z. Of course the main motivator is to provide what is best for the children with disabilities in order for them to be successful adults “beyond Academy Field” (Padilla, 2015).
REFERENCES


http://dx.doi.org/10.1080/2331186X.2015.1018698.


http://www.ed.gov/blog/topic/esea-reauthorization/


### APPENDIX A: COMPLIANCE CITATION DOCUMENT

#### Non-Compliance Citations and Corrective Actions

1) **200.1(r)** Functional behavioral assessment means the process of determining why a student engages in behaviors that impede learning and how the student's behavior relates to the environment. The functional behavioral assessment shall be developed consistent with the requirements in section 200.22(a) of this Part and shall include, but is not limited to, the identification of the problem behavior, the definition of the behavior in concrete terms, the identification of the contextual factors that contribute to the behavior (including cognitive and affective factors) and the formulation of a hypothesis regarding the general conditions under which a behavior usually occurs and probable consequences that serve to maintain it.

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<th>Regulatory Citation</th>
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<tbody>
<tr>
<td>200.1(r)</td>
<td>The District failed to provide documentation of evidence of functional behavioral assessments.</td>
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**Due Date**

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**Verification of Compliance**

- The Regional Associate will verify compliance by reviewing a random sample of student records at an on site visit.

2) **200.22** Program standards for behavioral interventions.

Behavioral interventions for students with disabilities shall be provided in accordance with this section and those other applicable provisions of this Part and/or Part 201 that are not inconsistent with this section.

- **(a) Assessment of student behaviors.** For purposes of this section, an assessment of student behaviors shall mean a functional behavioral assessment (FBA), as such term is defined in section 200.1(r) of this Part.

- **(1) A FBA shall be conducted as required in section 200.4 of this Part and section 201.3 of this Title.**

- **200.4(b)(1)(v) other appropriate assessments or evaluations, including a functional behavioral assessment for a student whose behavior impedes his or her learning or that of others, as necessary to ascertain the physical, mental, behavioral and emotional factors which contribute to the suspected disabilities.**

- **201.3 CSE responsibilities for functional behavioral assessments and behavioral intervention plans.**

If the manifestation team pursuant to section 201.4 of this Part, makes the determination that the conduct subject to the disciplinary action was a manifestation of the student’s disability, the CSE must either:

- (a) conduct a functional behavioral assessment, unless the school district had conducted a functional behavioral assessment before the behavior that resulted in the change of placement occurred, and implement a behavioral intervention plan for the student; or

- (b) if a behavioral intervention plan has already been developed, review the behavioral intervention plan and modify it as necessary to address the behavior.

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<th>Regulatory Citation</th>
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<tr>
<td>200.22(a)(1)</td>
<td>The District failed to provide documentation of evidence that functional behavioral assessments were conducted.</td>
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**Due Date**

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**Verification of Compliance**

- The Regional Associate will verify compliance by reviewing a random sample of student records at an on site visit.
3) 200.22(b)(2) In accordance with the requirements in section 200.4 of this Part, in the case of a student whose behavior impedes his or her learning or that of others, the CSE or CPSE shall consider strategies, including positive behavioral interventions and supports and other strategies to address that behavior. If a particular device or service, including an intervention, accommodation or other program modification is needed to address the student’s behavior that impedes his or her learning or that of others, the IEP shall so indicate. A student’s need for a behavioral intervention plan shall be documented on the IEP and such plan shall be reviewed at least annually by the CSE or CPSE.

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<th>Regulatory Citation</th>
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<tr>
<td>200.22(b)(2)</td>
<td>The District failed to provide documentation of evidence that the CSE or CPSE had considered strategies to address the behavior of a student with a disability when that student’s behavior impeded his ability to learn or that of others.</td>
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Due Date: 12/02/2013

**Required Corrective Action**

The District will ensure that the CSE or CPSE considers strategies to address the behavior of a student with a disability when that student’s behavior impeded his ability to learn or that of others.

**Verification of Compliance**

The Regional Associate will verify compliance by reviewing a random sample of student records at an on-site visit.

4) 200.22(b)(5) Progress monitoring. The implementation of a student’s behavioral intervention plan shall include regular progress monitoring of the frequency, duration and intensity of the behavioral interventions at scheduled intervals, as specified in the behavioral intervention plan and on the student’s IEP. The results of the progress monitoring shall be documented and reported to the student’s parents and to the CSE or CPSE and shall be considered in any determination to revise a student’s behavioral intervention plan or IEP.

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<tr>
<td>200.22(b)(5)</td>
<td>The District failed to provide documentation of evidence of progress monitoring for behavioral intervention plans.</td>
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Due Date: 12/02/2013

**Required Corrective Action**

The District will ensure that behavioral intervention plans are implemented including regular progress monitoring of the frequency, duration and intensity of the behavioral interventions at scheduled intervals as specified in the behavioral intervention plan and the student’s Individualized Education Program.

**Verification of Compliance**

The Regional Associate will verify compliance by reviewing a random sample of student records at an on-site visit.
Non-Compliance Citations and Corrective Actions

5) 200.4(b)(1)(v) other appropriate assessments or evaluations, including a functional behavioral assessment for a student whose behavior impedes his or her learning or that of others, as necessary to ascertain the physical, mental, behavioral and emotional factors which contribute to the suspected disabilities.

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<th>Regulatory Citation</th>
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<tr>
<td>200.4(b)(1)(v)</td>
<td>The District failed to provide documentation of evidence of appropriate assessments or evaluations for students whose behavior impedes his or her ability to learn or that of others.</td>
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<td>12/02/2013</td>
<td>The District will ensure that appropriate assessments or evaluations are conducted and reviewed for students whose behavior impedes his or her ability to learn or that of others.</td>
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<td>The Regional Associate will verify compliance by reviewing a random sample of student files at an on site visit.</td>
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6) 200.4(e)(3) The school district shall ensure that the recommendations on a student’s IEP, including changes to the IEP made pursuant to subdivision (g) of this section, are implemented, including but not limited to:

(i) ensuring that each regular education teacher, special education teacher, related service provider, and/or other service provider, as defined in section 200.2(b)(11)(i)(a) of this Part, who is responsible for the implementation of a student’s IEP, is provided a paper or electronic copy of the IEP prior to the implementation of such IEP or shall be able to access such student’s IEP electronically.

(ii) ensuring that supplementary school personnel, as defined in section 200.1(hh) of this Part, and each other provider responsible for assisting in the implementation of a student’s IEP, has the opportunity to review a copy of the student’s IEP, prior to the implementation of such program, and has ongoing access to a copy of the IEP, which may be the copy provided to the student’s special education teacher 55 200.4 or the teacher or related service provider under whose direction such supplementary school personnel or other provider works;

(iii) ensuring that each regular education teacher, special education teacher, related service provider, other service provider, supplementary school personnel as defined in section 200.1(hh) of this Part, and other provider and support staff person has been informed, prior to the implementation of the IEP, of his or her responsibility to implement the recommendations on the student’s IEP, including the responsibility to provide specific accommodations, program modifications, supports and/or services for the student in accordance with the IEP; and

(iv) ensuring that a copy of the IEP is provided to the student’s parents, including a revised copy of the IEP at the parent’s request with the amendments developed pursuant to subdivision (g) of this section incorporated, at no cost to the student’s parents.

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<tr>
<td>200.4(e)(3)</td>
<td>The District failed to provide documentation of changes to a student’s IEP, including changes made to the IEP after the annual review, are implemented.</td>
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<tr>
<td>12/02/2013</td>
<td>The District will ensure that changes are made, as necessary, to a student’s IEP.</td>
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<td>The Regional Associate will verify compliance by reviewing a random sample of student records at an on site visit.</td>
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</table>
### Non-Compliance Citations and Corrective Actions

#### 7) 201.10(b) During suspensions or removals for periods of up to 10 school days in a school year that do not constitute a disciplinary change in placement, students with disabilities of compulsory attendance age shall be provided with alternative instruction pursuant to Education Law, section 3214(3)(e) on the same basis as non-disabled students. Students with disabilities who are not of compulsory attendance age shall be entitled to receive services during such suspensions only to the extent that services are provided to nondisabled students of the same age who have been similarly suspended.

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<td>201.10(b)</td>
<td>The District failed to provide evidence that students with disabilities suspended for periods of up to 10 school days in a school year that do not constitute a disciplinary change in placement were provided with alternative instruction on the same basis as non disabled students.</td>
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<tr>
<td>12/02/2013</td>
<td>The District will ensure that students with disabilities suspended for periods of up to 10 school days in a school year that do not constitute a disciplinary change in placement are provided with alternative instruction on the same basis as non disabled students.</td>
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#### 8) 201.10(c) During subsequent suspensions or removals for periods of 10 consecutive school days or less that in the aggregate total more than 10 school days in a school year but do not constitute a disciplinary change in placement, regardless of the manifestation determination, students with disabilities shall be provided with services necessary to enable the student to continue to participate in the general education curriculum and to progress toward meeting the goals set out in the student's IEP and to receive, as appropriate, a functional behavioral assessment, behavioral intervention services and modifications that are designed to address the behavior violation so it does not recur. School personnel, in consultation with at least one of the student's teachers, shall determine the extent to which services are needed, so as to enable the student to continue to participate in the general education curriculum, although in another setting, and to progress in meeting the goals set out in the student's IEP.

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<tr>
<td>201.10(c)</td>
<td>The District failed to provide evidence that students with disabilities are suspended for 10 consecutive school days or less that in the aggregate total more than 10 school days in a school year but do not constitute a disciplinary change in placement, regardless of the manifestation determination, the student was provided with services to enable the student to participate in the general education curriculum and progress toward meeting the goals in the student's IEP.</td>
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<tr>
<td>12/02/2013</td>
<td>The District will ensure that when students with disabilities are suspended for 10 consecutive school days or less that in the aggregate total more than 10 school days in a school year but do not constitute a disciplinary change in placement, regardless of the manifestation determination, the student is provided with services to enable the student to participate in the general education curriculum and progress toward meeting the goals in the student's IEP.</td>
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<td>The Regional Associate will verify compliance by reviewing a random sample of student records at an on site visit.</td>
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9) 201.10(d) During suspensions or other disciplinary removals, including suspensions or removals pursuant to section 201.7(e) of this Part, for periods in excess of 10 school days in a school year which constitute a disciplinary change in placement, regardless of the manifestation determination, students with disabilities shall be provided with services necessary to enable the student to continue to participate in the general education curriculum, to progress toward meeting the goals set out in the student’s IEP, and to receive, as appropriate pursuant to section 201.3 of this Part, a functional behavioral assessment, behavioral intervention services and modifications that are designed to address the behavior violation so it does not recur. The IAES and services shall be determined by the CSE.

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<tr>
<td>201.10(d)</td>
<td>The District failed to provide evidence that when students with disabilities are suspended in excess 10 school days in a school year and those suspensions constitute a disciplinary change in placement, the students were provided with services to enable them to participate in the general education curriculum and progress toward meeting the goals in the student’s IEP.</td>
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Due Date | Required Corrective Action
---|---
12/02/2013 | The District will ensure that when students with disabilities are suspended in excess 10 school days in a school year and those suspensions constitute a disciplinary change in placement, the students are provided with services to enable them to participate in the general education curriculum and progress toward meeting the goals in the student’s IEP.

Verification of Compliance
The Regional Associate will verify compliance by reviewing a random sample of student records at an on site visit.

10) 201.2 Definitions. As used in this Part, the following terms shall have the following meanings.

(a) Behavioral Intervention plan means a plan that is based on the results of the functional behavioral assessment and, at a minimum, includes a description of the problem behavior, global and specific hypotheses as to why the problem behavior occurs and intervention strategies that include positive behavioral supports and services to address the behavior.

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<tr>
<td>201.2(a)</td>
<td>The District failed to provide documentation of evidence that behavioral intervention plans were developed based on a functional behavioral assessment for students with disabilities.</td>
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Due Date | Required Corrective Action
---|---
12/02/2013 | The District will ensure that behavioral intervention plans are developed based on a functional behavioral assessment for students with disabilities.

Verification of Compliance
The Regional Associate will verify compliance by reviewing a random sample of student records at an on site visit.
Non-Compliance Citations and Corrective Actions

11) 201.2(k) Interim alternative educational setting or IAES a temporary educational placement, other than the student’s current placement at the time the behavior precipitating the IAES placement occurred. A student who is placed in an IAES shall:
   (1) continue to receive educational services so as to enable the student to continue to participate in the general education curriculum, although in another setting, and to progress toward meeting the goals set out in the student’s IEP, and

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<tr>
<td>201.2(k)(1)</td>
<td>The District failed to provide documentation of evidence that students with disabilities who were suspended continued to receive educational services to enable them to continue to participate in the general education curriculum.</td>
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<tr>
<td>12/02/2013</td>
<td>The District will ensure that students with disabilities who are suspended continue to receive educational services to enable them to continue to participate in the general education curriculum.</td>
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<td>The Regional Associate will verify compliance by reviewing a random sample of student records at an on site visit.</td>
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12) 201.2(k)(2) receive, as appropriate, a functional behavioral assessment and behavioral intervention services and modifications that are designed to address the behavior violation so that it does not recur.

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<tr>
<td>201.2(k)(2)</td>
<td>The District failed to provide evidence of functional behavioral assessments and behavioral intervention plans for students with disabilities placed in interim alternative educational settings.</td>
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<tr>
<td>12/02/2013</td>
<td>The District will ensure that all students with disabilities placed in an interim alternative educational setting receive functional behavioral assessments and behavioral intervention plans, as appropriate.</td>
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<tr>
<td>The Regional Associate will verify compliance by reviewing a random sample of student records at an on site visit.</td>
</tr>
</tbody>
</table>

13) 201.3 CSE responsibilities for functional behavioral assessments and behavioral intervention plans. If the manifestation team pursuant to section 201.4 of this Part, makes the determination that the conduct subject to the disciplinary action was a manifestation of the student’s disability, the CSE must either:
   (a) conduct a functional behavioral assessment, unless the school district had conducted a functional behavioral assessment before the behavior that resulted in the change of placement occurred, and implement a behavioral intervention plan for the student; or
   (b) if a behavioral intervention plan has already been developed, review the behavioral intervention plan and modify it as necessary to address the behavior.
## Non-Compliance Citations and Corrective Actions

<table>
<thead>
<tr>
<th>Regulatory Citation</th>
<th>Description of Noncompliance</th>
</tr>
</thead>
<tbody>
<tr>
<td>201.3</td>
<td>The District failed to provide evidence that when the manifestation team determined the student’s conduct subject to disciplinary action was a manifestation of the student’s disability, the CSE conducted an FBA and implemented a BIP or if a BIP was already developed, reviewed the BIP and modified, if necessary, to address the behavior.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Due Date</th>
<th>Required Corrective Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>12/02/2013</td>
<td>The District will ensure that when the manifestation team determines the student’s conduct subject to disciplinary action is a manifestation of the student’s disability, the CSE conducts an FBA and implements a BIP or if a BIP is already developed, review the BIP and modify, if necessary, to address the behavior.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Verification of Compliance</th>
</tr>
</thead>
<tbody>
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</tr>
</tbody>
</table>

14) **201.7 General procedures for suspensions and removals of students with disabilities.**

(a) **Parental notice of disciplinary removal.** No later than the date on which a decision is made to change the placement of a student with a disability to an IAES pursuant to subdivision (e) of this section or pursuant to section 201.8 of this Part, or a decision is to impose a suspension or removal pursuant to this Subpart that constitutes a disciplinary change in placement, the parent shall be notified of such decision and shall be provided the procedural safeguards notice in accordance with section 200.5(f) of this Title. 201.7 218

<table>
<thead>
<tr>
<th>Regulatory Citation</th>
<th>Description of Noncompliance</th>
</tr>
</thead>
<tbody>
<tr>
<td>201.7(a)</td>
<td>The District failed to provide evidence that parental notice was given to the parent on the date that a decision was made to change the placement of a student with a disability to an interim alternative educational setting and the parents were provided with the procedural safeguards notice.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Due Date</th>
<th>Required Corrective Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>12/02/2013</td>
<td>The District will ensure that parental notice is given to the parent of a student with a disability on the date the decision is made to change the placement of that student to an interim alternative educational setting and that the parent is also given a procedural safeguards notice.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>The Regional Associate will verify compliance by reviewing a random sample of student records at an on site visit.</td>
</tr>
</tbody>
</table>

15) **201.7(b) Five school day suspension or removal.** Except as otherwise provided in subdivision (d) of this section, the trustees or board of education of any school district, a district superintendent of schools or a building principal with authority to suspend students pursuant to Education Law section 3214(3)(b) and (g), shall have authority to order the placement of a student with a disability into an appropriate interim alternative educational setting, another setting or suspension for a period not to exceed five consecutive school days, and not to exceed the amount of time that a nondisabled student would be subject to suspension for the same behavior.

<table>
<thead>
<tr>
<th>Regulatory Citation</th>
<th>Description of Noncompliance</th>
</tr>
</thead>
<tbody>
<tr>
<td>201.7(b)</td>
<td>The District failed to provide evidence that student’s with disabilities suspended for five school days were placed in an appropriate interim alternative educational setting, another setting or suspension for a period not to exceed five consecutive school days, and not to exceed the amount of time that a nondisabled student would be subject to suspension for the same behavior.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Due Date</th>
<th>Required Corrective Action</th>
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</table>
16) 201.9 Coordination with superintendent's hearing and other due process procedures applicable to all students. (c) Procedures for suspensions of more than five school days (superintendent's hearings). Superintendent's hearings on disciplinary charges against students with disabilities and students presumed to have a disability for discipline purposes shall be bifurcated into a guilt phase and a penalty phase and conducted in accordance with the following procedures: (2) Upon a determination by the manifestation team that the behavior of a student with a disability was not a manifestation of the student's disability, such student may be disciplined in the same manner as a nondisabled student, except that such student shall continue to receive services in accordance with section 201.10 of this Part. Upon receipt of notice of such determination, the superintendent or hearing officer in the superintendent's hearing shall proceed with the penalty phase of the hearing. If the manifestation team determines that the behavior was a manifestation of the student's disability, the superintendent or hearing officer in the superintendent's hearing shall dismiss the superintendent's hearing, except as otherwise provided in paragraph (3) of this subdivision.

201.10 Provision of services during suspensions.
(a) During any period of suspension, a student with a disability shall be provided services to the extent required under this section and paragraph (e) of subdivision 3 of section 3214 of the Education Law. Nothing in this section shall be construed to confer a greater right to services than is required under Education Law, section 3214(3)(e) and Federal law and regulations.
(b) During suspensions or removals for periods of up to 10 school days in a school year that do not constitute a disciplinary change in placement, students with disabilities of compulsory attendance age shall be provided with alternative instruction pursuant to Education Law, section 3214(3)(e) on the same basis as nondisabled students. Students with disabilities who are not of compulsory attendance age shall be entitled to receive services during such suspensions only to the extent that services are provided to nondisabled students of the same age who have been similarly suspended.
(c) During subsequent suspensions or removals for periods of 10 consecutive school days or less that in the aggregate total more than 10 school days in a school year but do not constitute a disciplinary change in placement, regardless of the manifestation determination, students with disabilities shall be provided with services necessary to enable the student to continue to participate in the general education curriculum and to progress toward meeting the goals set out in the student's IEP and to receive, as appropriate, a functional behavioral assessment, behavioral intervention services and modifications that are designed to address the behavior violation so it does not recur. School personnel, in consultation with at least one of the student's teachers, shall determine the extent to which services are needed, so as to enable the student to continue to participate in the general education curriculum, although in another setting, and to progress in meeting the goals set out in the student's IEP.
(d) During suspensions or other disciplinary removals, including suspensions or removals pursuant to section 201.7(e)
Non-Compliance Citations and Corrective Actions

(e) Change in placement to an IAES for behavior involving serious bodily injury, weapons, illegal drugs or controlled substances. (1) A superintendent of schools, either directly or upon recommendation of a hearing officer designated to conduct a superintendent's hearing pursuant to Education Law, section 3214(3)(c), may order the change in placement of a student with a disability to an appropriate IAES, to be determined by the CSE, for up to 45 school days, but not to exceed the period of suspension ordered by the superintendent in accordance with Education Law, section 3214(3), where the student

(i) has inflicted serious bodily injury, as defined in section 201.2(m) of this Part, upon another person while at school, on school premises or at a school function under the jurisdiction of the educational agency;

(ii) carries or possesses a weapon to or at school, on school premises, or to or at a school function under the jurisdiction of the educational agency; or

(iii) knowingly possesses or uses illegal drugs or sells or solicits the sale of a controlled substance while at school, on school premises or at a school function under the jurisdiction of the educational agency.

(2) The period of suspension or removal ordered by the superintendent may not exceed the amount of time that a nondisabled student would be suspended for the same behavior of this Part, for periods in excess of 10 school days in a school year which constitutes a disciplinary change in placement, regardless of the manifestation determination, students with disabilities shall be provided with services necessary to enable the student to continue to participate in the general education curriculum, to progress toward meeting the goals set out in the student's IEP, and to receive, as appropriate pursuant to section 201.3 (See Above) of this Part, a functional behavioral assessment, behavioral intervention services and modifications that are designed to address the behavior violation so it does not recur. The IAES and services shall be determined by the CSE.

<table>
<thead>
<tr>
<th>Regulatory Citation</th>
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<tbody>
<tr>
<td>201.9(c)(2)</td>
<td>The District failed to provide evidence that a student with a disability who has received a disciplinary change in placement continued to receive services in accordance with regulatory requirements when the behavior of the student was not a manifestation of the student's disability.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Due Date</th>
<th>Required Corrective Action</th>
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</thead>
<tbody>
<tr>
<td>12/02/2013</td>
<td>The District will ensure that a student with a disability who has received a disciplinary change in placement and whose behavior was found to not be a manifestation of his disability will continue to receive services in accordance with regulatory requirements.</td>
</tr>
</tbody>
</table>

Verification of Compliance

17) 200.4(b) Individual evaluation and reevaluation. (1) Unless a referral for an evaluation submitted by a parent or a school district is withdrawn pursuant to paragraph (3)(7) or (9) of this section, after parental consent has been obtained or a parental refusal to consent is overridden, an individual evaluation of the referred student shall be initiated by a committee on special education. The initial individual evaluation shall be completed within 60 days of receipt of consent unless extended by mutual agreement of the student's parent and the CSE pursuant to subparagraph (7)(b) of this subdivision. The individual evaluation shall include a variety of assessment tools and strategies, including information provided by the parent, to gather relevant functional, developmental and academic information about the student that may assist in determining whether the student is a student with a disability and the content of the student's individualized education program, including information related to enabling the student to participate and progress in the general education curriculum (or for a preschool child, to participate in appropriate activities). The individual evaluation must be at no cost to the parent, and the initial evaluation must include at least:

(i) a physical examination in accordance with the provisions of sections 903, 904 and 905 of the Education Law;

(ii) an individual psychological evaluation, except when a school psychologist determines after an assessment of a school-age student, pursuant to paragraph (2) of this subdivision, that further evaluation is unnecessary;

(iii) a social history;

(iv) an observation of the student in the student's learning environment (including the regular classroom setting) or, in the case of a student of less than school-age or out of school, an environment appropriate for a student of that age, to document the student's academic performance and behavior in the areas of difficulty; and

(v) other appropriate assessments or evaluations, including a functional behavioral assessment for a student whose behavior inhibits his or her learning or that of others, as necessary to ascertain the physical, mental, behavioral and emotional factors which contribute to the suspected disabilities.
Non-Compliance Citations and Corrective Actions

<table>
<thead>
<tr>
<th>Citation</th>
<th>Required Corrective Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>200.4(b)(1)</td>
<td>Upon obtaining the parental consent to evaluate, the district must initiate and complete an individual, multi-disciplinary evaluation to determine eligibility for special education programs and services within 60 calendar days.</td>
</tr>
</tbody>
</table>

**Verification of Compliance**
The Regional Associate will review the records of a random sample of students referred for an initial special education evaluation to verify compliance.

18) 200.4(b)(4) A committee on special education shall arrange for an appropriate reevaluation of each student with a disability if the school district determines that the educational or related services needs, including improved academic achievement and functional performance of the student, warrant a reevaluation or if the student's parent or teacher requests a reevaluation, but not more frequently than once a year unless the parent and representatives of the school district appointed to the committee on special education agree otherwise, and at least once every three years, except where the school district and the parent agree in writing that such reevaluation is unnecessary. The reevaluation shall be conducted by a multidisciplinary team or group of persons, including at least one teacher or other specialist with knowledge in the area of the student's disability. In accordance with paragraph (5) of this subdivision, the reevaluation shall be sufficient to determine the student's individual needs, educational progress and achievement, the student's ability to participate in instructional programs in regular education and the student's continuing eligibility for special education. The results of any reevaluations must be addressed by the committee on special education in a meeting to review and, as appropriate, revise the student's IEP. To the extent possible, the school district shall encourage the consolidation of reevaluation meetings for the student and other committee on special education meetings for the student.

<table>
<thead>
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</thead>
<tbody>
<tr>
<td>200.4(b)(4)</td>
<td>All students with disabilities must be reevaluated at least once every three years, except where the school district and the parent agree in writing that such reevaluation is unnecessary. The district will ensure reevaluations are conducted for all students with disabilities at least once every three years or provide documentation in writing that the parent has agreed that the reevaluation is unnecessary.</td>
</tr>
</tbody>
</table>

**Verification of Compliance**
The Regional Associate will conduct a record review of a random sample of students' IEPs to verify compliance.

19) 200.4(d)(2)(ix) Transition services. For those students beginning not later than the first IEP to be in effect when the student is age 15 (and at a younger age, if determined appropriate), and updated annually, the IEP shall, under the applicable components of the student's IEP, include:
(a) under the student's present levels of performance, a statement of the student's needs, taking into account the student's strengths, preferences and interests, as they relate to transition from school to post-school activities as defined in section 200.1(fff) of this Part;
## Non-Compliance Citations and Corrective Actions

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>200.4(d)(2)(ix)(a)</td>
<td>For all students with disabilities ages 15 and older, the district will ensure that the student’s IEP contains a statement of needs relating to transition under the student’s present levels of performance, postsecondary goals that are measurable and appropriate, transition services focusing on the student’s course of study and activities to meaningfully facilitate movement for the student from school to post school activities.</td>
<td>06/28/2013</td>
</tr>
</tbody>
</table>

### Verification of Compliance

The Regional Associate will randomly review a sample of IEPs for students 15 years of age and older to verify compliance.
APPENDIX B: CONSENT FOR PARTICIPATION IN RESEARCH

UNIVERSITY OF NEW ENGLAND
CONSENT FOR PARTICIPATION IN RESEARCH

Project Title:
Special Education Department Organizational Change:
Case Study

Principal Investigator(s):
• Christina Castellane Cloidt, student researcher, University of New England
  Ccloidt@une.edu; 845.551.6389

• Dr. Steven Moskowitz, faculty advisor, University of New England
  smoskowitz@une.edu; 860.631.7838

Introduction:
• Please read this form, you may also request that the form is read to you. The purpose of
  this form is to provide you with information about this research study, and if you choose
  to participate, document your decision.

• You are encouraged to ask any questions that you may have about this study, now, during
  or after the project is complete. You can take as much time as you need to decide whether
  or not you want to participate. Your participation is voluntary.

Why is this study being done?
• The District Z is currently cited for nineteen areas of non-compliance. This study will
  follow the district in their attempts to implement interventions to address the areas of
  non-compliance.

Who will be in this study?
• People participating in this study were identified as
  o having historical knowledge of the district and the special education department
  o are stakeholders in the processes and interventions that will be taking place

• There will be approximately fifteen participants

What will I be asked to do?
• The participant research activities for this study include:
  o sign this consent form
  o schedule an interview
  o complete the interview

• There will be no remuneration or reimbursement for your participation.

What are the possible risks of taking part in this study?
• There are no foreseeable risks associated with participation in this study.

What are the possible benefits of taking part in this study?
• There are no direct benefits to you for participating in this study.

**What will it cost me?**
• There are no costs affiliated with your participation in this study.

**How will my privacy be protected?**
• I am the only person who will be able to identify the participants throughout the process.
• Your name will be changed to a participant number in all documents related to the study.
• My research advisor, who is not a member of the District Z or a constituent but an employee of UNE, is the only other person who will have access to your name.
• The interviews will take place in person and only the two of us will be present.
• The surveys will occur electronically and will be anonymous in the results.
• The finished project will not have any participant’s identification and will be presented to a committee of UNE faculty.

**How will my data be kept confidential?**
• Data in this study includes your answers to my questions.
• While the interview part of this study is not completely anonymous (I will know who you are), I will make the following efforts to ensure my data is kept confidential:
  o All electronic correspondence will be password protected and will be deleted at the conclusion of the study.
  o The recordings of the interview will be electronically stored and password protected. Only the researcher and the faculty advisor will have access to the recordings which will also be deleted upon study completion.
  o No paperwork will have your name on it, however there will be transcripts of the interview but will be assigned a number instead of a name. These transcripts will only exist in electronic format on my personal password protected device.
  o All interview data will be coded.
• My work with the data will remain on a password protected personal computer.
• A copy of your signed consent form (in a scanned electronic format) will be maintained by the principal investigator for at least 3 years after the project is complete before it is destroyed. The paper consent forms will be shredded after being scanned.
• The data and results that come from this study may be used in later studies regarding special education leadership and administration.
• Research findings can be provided to participants upon email request to ccloidt@une.edu.
• Please note that the Institutional Review Board may review the research records.
• A copy of your signed consent form will be maintained by the principal investigator for at least 3 years after the project is complete before it is destroyed. The consent forms will be stored in a secure location that only members of the research team will have access to and will not be affiliated with any data obtained during the project.

**What are my rights as a research participant?**
• Your participation is voluntary. Your decision to participate will have no impact on your current or future relations with the University of New England or District Z.
• You may skip or refuse to answer any question for any reason.
If you choose not to participate there is no penalty to you and you will not lose any benefits that you are otherwise entitled to receive. You are free to withdraw from this research study at any time, for any reason. If you choose to withdraw from the research there will be no penalty to you and you will not lose any benefits that you are otherwise entitled to receive.

**What other options do I have?**
- You may choose not to participate.

**Whom may I contact with questions?**
- The researchers conducting this study are Christina Castellane Cloidt (principal investigator) ccloidt@une.edu; 845.551.6389 and Steven Moskowitz (faculty advisor) smoskowitz@une.edu; 860.631.7838.

- If you choose to participate in this research study and believe you may have suffered a research related injury, please contact the individuals above at the noted numbers.
- If you have any questions or concerns about your rights as a research subject, you may call Olgun Guvench, M.D. Ph.D., Chair of the UNE Institutional Review Board at (207) 221-4171 or irb@une.edu.

**Will I receive a copy of this consent form?**
- You will be given a copy of this consent form.

---

**Participant’s Statement**

I understand the above description of this research and the risks and benefits associated with my participation as a research subject. I agree to take part in the research and do so voluntarily.

____________________________________________________

Participant’s signature or Legally Authorized Representative         Date

____________________________________________________

Printed name
Researcher’s Statement
The participant named above had sufficient time to consider the information, had an
opportunity to ask questions, and voluntarily agreed to be in this study.

__________________________________________________________  Date
Researcher’s signature

__________________________________________________________
Printed name
APPENDIX C: STATEMENT OF CONFIDENTIALITY

Thank you so much for meeting with me, __________. I know as a colleague, that you have little free time out there and I thank you again for choosing to spend some of it with me today.

To facilitate my note taking, I will be recording the interview. Thank you for submitting the signed consent form. The only individuals who will have access to these recordings and my notes are faculty advisors, dissertation committee members, and myself. The recordings will be deleted within one calendar year of our meeting today.

Please remember:

(1) All of the information you share is confidential.

(2) Your participation is voluntary, and you may stop the interview at any time.

(3) I have completed the necessary steps to ensure no harm is caused to participants as a result of their participation in the study.

This interview should only last approximately 30 minutes. I will ask you several questions that may include clarifying or follow up questions relative to your answer or the original question asked.

You have been selected to speak with me today because you have been a __________ in the district prior to the 20115-2016 school year. You have expertise to share regarding policies, processes and protocols as well as perceptions that are beneficial to the improvement of the department. As you are aware, my study focuses on the path towards compliance this year. This study does not to look to evaluate your work or experiences; rather it is intended to focus on the experience of working in the department.
APPENDIX D: PARTICIPANT INTERVIEW QUESTIONS

Interview Questions:

What is your current position? How long have you held that position?

Please describe your current role in the department?

Please describe the special education department prior to the current administration?

Summarize how the special education department was meeting the needs of the students. Parents. Staff. Faculty.

What were the systems/protocols to ensure compliance?

- For initial evaluations?
- For re-evaluations?
- Amendment Agreement- No meeting?
- Creating PWNs?
- Chairing CSE meetings?

Describe communication across the department? With support staff? With CSE chairs?

With psychologists? With parents? With faculty?

Thank you for your time and assistance in gathering this data. Please remember that our conversation is confidential. All data collected will be coded. I look forward to our next meeting.
APPENDIX E: SCHOOL BASED PRACTICES PROFILE: A SELF-ASSESSMENT TO GUIDE INCLUSIVE EDUCATION PRACTICES

A Faculty Survey about special education service

<table>
<thead>
<tr>
<th>Statement</th>
<th>Agree</th>
<th>Disagree</th>
</tr>
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<tbody>
<tr>
<td>All faculty members feel a strong sense of responsibility for all students, including students with disabilities.</td>
<td></td>
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<tr>
<td>I am knowledgeable of the contents of each student’s IEP for which I have in my classes.</td>
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<tr>
<td>I am confident that together the general and special education teachers and related services in our building can solve almost any problem that might arise regarding quality services for students with disabilities.</td>
<td></td>
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<tr>
<td>General education and special education teachers and related service providers regularly plan together to meet the needs of students with disabilities.</td>
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<td></td>
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<tr>
<td>Sufficient time is devoted to collaborative planning regarding the needs of students with disabilities.</td>
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<tr>
<td>Planning team members in our building use available planning time effectively (i.e. arrive on time, bring needed materials, staff focused).</td>
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<tr>
<td>Planning teams regularly experience a high degree of success in addressing issues related to student progress in school.</td>
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<tr>
<td>I am knowledgeable of the IDEA requirement to assure access to the general curriculum for students with disabilities.</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>I have the curriculum I need for the subjects I teach.</td>
<td></td>
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<tr>
<td>I have sufficient teaching materials to address the array of students I teach.</td>
<td></td>
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<tr>
<td>The IEP developed for each student with disabilities is aligned to the CCLS.</td>
<td>Agree</td>
<td>Disagree</td>
</tr>
<tr>
<td>Access to the general curriculum is available for students with disabilities, regardless of the instructional setting in which they are taught.</td>
<td></td>
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<tr>
<td>It is the responsibility of all educators to use instructional accommodations for any student who will be more successful in school because of these accommodations.</td>
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<tr>
<td></td>
<td>Agree</td>
<td>Disagree</td>
</tr>
<tr>
<td>---</td>
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</tr>
<tr>
<td>I use instructional accommodations for any student who needs them.</td>
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<td></td>
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<tr>
<td>It is the responsibility of all educators to adapt instruction (change what is taught) as appropriate for any student with disabilities who requires them as stated in the Individualized Education Program (IEP).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I adapt instruction for students with disabilities as specified in the IEP.</td>
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<td></td>
</tr>
<tr>
<td>It is fair and appropriate to adapt grades for students with disabilities as specified in their (IEP).</td>
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<td></td>
</tr>
<tr>
<td>I modify grades for students with disabilities as specified in their IEP.</td>
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<tr>
<td>The majority of our teachers do not rely on lecture as their primary instructional delivery strategy.</td>
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<tr>
<td>Our school has adopted a school-wide behavioral support model to create a stable, positive learning environment for all students.</td>
<td></td>
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<tr>
<td>Our faculty uses explicit instructional techniques to teach desired behaviors at age-appropriate levels for each grade level.</td>
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</tr>
<tr>
<td>There is a direct link between effective teaching practices and positive behavioral outcomes for students.</td>
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<tr>
<td>The roles and responsibilities of RtI members are clearly defined for team members and for the faculty.</td>
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<tr>
<td>Our RtI process is effective in identifying students who are experiencing difficulty in school.</td>
<td></td>
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<tr>
<td>Our RtI process is effective in providing guidance to teachers regarding interventions, strategies, and programs that positively impact students.</td>
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<tr>
<td>I have received staff development opportunities that effectively addressed my questions relative to the RtI process for our school.</td>
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<tr>
<td>I think the philosophy of inclusive education practices is valid.</td>
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<td></td>
</tr>
<tr>
<td>I think that children benefit socially when special education students and general education students learn in the same classroom.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I think that students benefit academically when special education students and general education students learn in the same classroom.</td>
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</tbody>
</table>

Thank you for completing and returning this survey. It will assist our school in our efforts toward continuous improvement.

References