

Special Education Procedural Manual Equity Audit

Belmont Public Schools

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2021- 2022 Academic Year

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Introduction and Goals

At the very center of our purpose for conducting this equity audit is student experience for students of color, with high needs and disabilities, ELL students, and economically disadvantaged students. Belmont Public Schools has only six schools in total which include four elementary schools, one middle school, and one high school and lacks diversity in the student population. The experiences of students mentioned above have the most potential to be overlooked and marginalized in such a way where their educational opportunities aren't ensured or protected. The responsibility typically falls on students and families with the least power and influence to overcome the pressures and barriers, both explicit and implicit, and in many times harmful ways. For example, while only 3.2% of students make up the student population at BPS, there were more identified Black students as having a SLD than they should have according to the state (15 African American students total when they should only have 12). To commit and ensure an equitable education and experience for their most vulnerable students, we worked together with BPS to start at the policy level by doing a qualitative data analysis.

The purpose and intention of this audit was to conduct a policy analysis for the BPS Special Education Program with an intention to do the following:

- Find bias language that contribute to inequities in BPS Special Education Program
- Provide recommendations for more equitable policy language based on findings
- Determine and analyze whether the Special Education Procedural Manual and Belmont Significantly Disproportionality Action Plan aligns with the Equitable Mindsets, Practices, and Consequences framework
- Determine whether these topics in equity are implemented in practice in the classroom and school setting
- Make recommendations for improvement in Special Education policies, practices, and student learning achievement, and transitioning experiences

To achieve the goals listed above, we reviewed solely the following documents:

1. Special Education Procedural Manual
2. Belmont Significantly Disproportionality Action Plan
3. Sample of student documentation chosen by Ken Kramer and Patricia Ball which included the following:
 - a. 3 Summary of Letters for Students Taken out of Special Education
 - i. (grade 6, grade 3, grade 1)
 - b. 3 Letters for Students Referred out of District
 - i. (Grade unknown, Grade 10, grade 7)
 - c. 5 Vision Statements

- i. Grade 3, grade 4, grade 6, grade 8, grade 10)
- d. 3 Transition Plans
 - i. (age 14, age 16, age 14)
- e. 3 full IEP's
 - i. (grade 1, grade 11, grade 5)

General Findings Summary: Broad Themes

1. **Overall Equity Language and Goals:** The Special Education Procedural Manual reviewed sparsely considers topics related to equity (i.e. consideration of external social, cultural, and economic factors in students' lives). There is a general lack of a cohesive equity mission, goal(s), standards, and/or specific equity frameworks throughout the manual described for students in Special Education.
 - a. Extended School Year Services: Language doesn't acknowledge that certain students are at greater risk of academic regression. The "all children have the same potential" reflects an overall "Equality", rather than "Equitable" mindset- which takes little account of disparities between students and families of different demographics including socio-economical, racial, gendered groups, etc.
2. **Parental Role and Participation:** Parental input and participation should be prioritized, specially outlined, and actively embedded in every section of the Special Education Procedural Manual (i.e. Scheduling TEAM Meetings, Eligibility Proceedings, and Evaluations, IEP Development).
 - a. Parents should be key members of Teams. In the case they are not available, they should have opportunities to instate a family or guardian representative to participate in all Team proceedings.
 - b. Parental roles should be prioritized and clearly elucidated in each section.
3. **TEAM Members, Meetings, and Decisions:**
 - a. Chairperson Selection - In acknowledgment of the decision-making power and responsibility held in this role, the Special Education department should take special note and consideration in selecting, vetting, and reviewing the fitness of each Team Chairperson. Their relationship to and knowledge of each assigned student should be prioritized in this role assignment.
 - b. Meeting Times / Flexibility - It should be ensured that Team meetings protect sufficient time with flexibility in order to make equitable decisions. In particular in Special Education Eligibility and Evaluation decisions.
 - c. Transitioning - There is no indication that TEAM members are encouraged to or required to establish a history of positive interaction and relationships with students and families. These

positive and reciprocal dynamics should be invested in and improved.

4. **Documentation and Data** - We observed no indication of educators or Special Education staff recording and assessing student data related to topics in equity (i.e. students' culture/community, race, economic circumstance, societal factors) in determining external and/or internal factors responsible for students academic achievement and learning. Due to the unavailability of these critical records, it is not possible to determine whether the Special Education department has employed an overall equitable process or meets conclusive equitable standards across particular sections in the Manual.

a. Eligibility Section (Page 13 - 22):

- i. There is an inconsistency between the written requirement and standards for eligibility proceedings (i.e. Historical Review records, Disciplinary and Behavioral exclusions) and the actual practices and records available to inform and guide this process. Specifically, it is not clear that these records are organized in a way that SpEd staff can locate and reference them. While most traces of this data might appear in "Summaries of TEAM Meetings", this data was not available to us and/or is inefficiently exchanged between educators, administration, and the Special Education department:
- ii. These practices run the risk of placing many students in Emotional Impairment and Communication Impairment categories, for example, where equitable factors may not be properly taken into consideration and addressed.

b. IEP Development (Page 24):

- i. Schedule modifications: These can be favorable but the main concern is the reasoning behind schedule modifications, and what is considered a "rare circumstance." There should be caution in ensuring these modifications don't do any harm if employed incorrectly.
- ii. Special Considerations (Least Restrictive Environment),
 1. When students are not in the integrated classroom, it is unclear what this physically looks like and there is potential for isolation. We did not receive photos or specific Belmont Public Schools classroom description (i.e are there windows, what kind of stimulation displayed on classroom walls, peer engagement).
 2. Learning Resource Centers - Without any data we cannot determine if students aren't physically comfortable, isolated, under-stimulated, and/or not encouraged to express preferences about their most conducive learning environment.

Analysis: Educator Mindset and Consequences Framework

The contents of this report were assessed and analyzed through the Educator Mindsets and Consequences Framework. We used this framework as a lens and metric to evaluate, for each section in the Special Education Procedural Manual, which equitable mindsets were explicitly included and addressed and which mindsets were critically missing from the report. We also employed this method to determine which practices in alignment with these mindsets were being actively demonstrated in context in the Special Education department, as they should be aligned with the Manual.

The Mindset Framework is defined as follows:

Richard Milner and colleagues (Filback et. al) identifies five major tenets of educational practice considered essential to understanding opportunity gaps - here we focus on four. All mindsets reveal biases, mindsets toward equity and inclusion, and associated practices and actions. Through these lenses, the mindsets can either support or prevent students from reaching their full potential inside and outside of school. These allowed us to identify and explain the realities of students and adults across Belmont's locational and relational contexts, communities, and policies in practice.

Educator Mindsets:

1. **Equity | Equality:** This mindset addresses whether educators consider the ways larger issues in society and student family privilege influence student achievement. We assess whether students receive that tailored support and additional opportunities to succeed, in light of situations that are outside of student control.
2. **Asset | Deficit Framing:** These mindsets provide insight into how we asset or deficit-frame our students, to the extent that educators draw upon students' unique cultures, languages, personal, and community assets in order to harness meaningful learning. And such that all students are held to high expectations and encouraged to thrive despite their differences.
3. **Awareness | Avoidance:** These mindsets uncover the level to which students' demographic categories are integrated into conversations and policy-level decisions and implementations. These mindsets address the comfort level of the school culture and of specific individuals in identifying and acknowledging students' demographics (race, gender, ability, sexuality, ethnicity) - as they shape student experiences and structural level decisions around access and opportunity.

4. **Context-Centered | Context-Neutral:** These mindsets provide insight to which school practices and curriculum are reflective of an appreciation and acknowledgment of students' lives outside of school - including community, home, and family experiences. It assesses the extent to which educators seek to understand and build on the home-school connection and support interactions that promote student learning.

The goal of this framework is to help us understand what is being done in our practice, the rationale behind these approaches, and the consequences of these decisions. This framework allows us to make recommendations for associated actions and concrete practices that start at the individual level, and apply out to networks of colleagues, students, and Belmont communities.

Section by Section (Procedural Manual) Analysis and Recommendations

Section: Response to Intervention (Page 2)

What's Equitable/Working Well:

Emphasis on the fact the Special Education department and school should collect relevant data prior to the special ed referral. The Manual explicitly states:

“Finally, faculty members must gather formative assessment data documenting the use of the intervention and student progress, and must use this data to inform future interventions(Page 2).”

What's Missing & Points of Attention (DELTAs):

While there was not one single Mindset-specific area of concern here, there is a most critical point that spans all of the Educator Mindsets and Consequences. Although formative assessment data and records are supposed to be collected and referenced throughout various points in Special Education processes, it was difficult to locate and analyze much of the data consequential for ensuring equitable deliberations and decisions across Special Education.

There appears to be a gap between where specific records are kept and how they are shared, outside of being noted as recorded in Team Meeting summaries. While some relevant records and documents were indeed provided for this audit's purposes, many critical records confirming equitable processes could not be provided for this Audit.

See Summary of Findings and the Overall Recommendations for further descriptions of this general finding.

Section Specific Recommendations

- All relevant documentation, records, and data regarding equity considerations for students should be efficiently exchangeable between the school teachers, building administrations, and the Special Education department. See Summary of Findings and the Overall Recommendations for further descriptions of this finding.

Section: Referral Process for Special Education (Page 3)

What's Equitable/Working Well:

Mindset Specific:

Context - Centered Mindset:

- Parent Referral Section - Ensures translation of referral for special education into the Parent's native language (Page 3).
- Timelines Section- Ensures that parents must give their consent before all testing evaluations are done (Page 4).

Section Specific Recommendations

- Parental Involvement - In the situation in which a parent does not consent or refuses an Evaluation (Page 4), the Manual should describe how the resolution is typically handled through the Bureau of Special Education Appeals.

Section: Evaluation (Page 6 - 11)

What's Equitable/Working Well:

Mindset Specific:

Equity Mindset and Aware Mindset:

- In the Evaluation Procedures Section on, it's acknowledged that students are not being over-tested (Page 9).

Context - Centered Mindset:

- Parental Involvement and Awareness - Information from the parents is considered in determining Eligibility (Page 7), and the Manual states that "all Evaluation reports are to be translated into the parents' primary language, if the primary language is not English (Page 9)."

Other Demonstrations of Equity:

The following point in the Manual is imperative and aligns with most of the mindsets and equitable themes and areas for improvement throughout this report:

"The TEAM must be sure that they have received parent input and have gathered sufficient data for making the eligibility determination (Page 9)."

What's Missing & Points of Attention (DELTAs):

Mindset Specific:

Asset/Deficit- Framing Mindset:

- In the Other Assessments section where the Manual discusses the Speech and Language Evaluation to assess communication and language (Page 8), an Asset-framing mindset and practice should make sure to consider the unique vernaculars, idioms, and linguistics of the student based on their cultural and self-

identified demographic backgrounds.

Context - Neutral Mindset:

- The Evaluation Procedures Section states that: “The persons conducting the assessments should ensure that the teacher is notified in advance of any pullout from class (Page 9).” Parents also need to be notified on these days when students are being pulled out of class for an evaluation.

- The Provision of Outside Evaluation section states that:

“The parents must provide the TEAM with a complete copy of the written report in order for the TEAM to consider the recommendations. As a general rule of thumb, the BPS will not consider outside evaluation reports handed to staff at a team meeting because reading the report during a meeting does not allow for meaningful consideration of the evaluation findings (Page 9).”

This rule of thumb is both Context-Neutral and problematic - in particular the section about the Team not being able to consider outside evaluations arriving during the time of the meeting. A Context - Aware mindset would be considerate and flexible to external circumstances such as: Whether parents were actively informed of this deadline and rule in advance, whether parents themselves just received said documentation despite seeking it out well in advance of the Team meeting. Parents who are dealing with a child with special needs might have more time constraints that need to be considered.

Section Specific Recommendations

- Evaluation of Academic Achievement Section - The Manual states that: “The school district shall also thoroughly evaluate and provide a narrative description of the student's educational / developmental status(Page 7).”

It's critical that these narratives are written from an Asset-Framing, Rather than a Deficit-Framing approach. A narrative characterized by Asset-framing would hold an expansive view that all students are able to learn and recognizes and builds on the potential that every student brings into the classroom.

- Parental Informing - Make Context- Centered adjustments to the Page 9 rule about parents needing to “provide all documents prior to the TEAM Meeting.” This is not always possible and there should be flexibility in place to address Equity, Awareness, and Context Centered Mindsets. Example flexibilities can include: accepting documents at the TEAM meeting in the case that the parent and the outside evaluator highlighted key points therein, or there's a summary cover page. Actively inform and remind parents of this rule and the acceptions.
 - Clarify all Timelines on Page 10 in terms of the TEAM considering outside evaluations - so to ensure all these separate documents from separate sources are considered within timely and effective simultaneity
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Section: The IEP Team (Page 11- 13)

What's Equitable/Working Well:

Specific Mindsets Demonstrated:

Context - Centered Mindset:

- Ensures that Team meetings will be held at a mutually agreeable time and place with parents (Page 12). This demonstrates appreciation for the critical connection between family and pivotal decisions for students' well-being and academic achievement.
- Member Excusal: "IDEA 2004 permitting members be excused if parent and district agree (written agreement from parent)" values and includes parents' judgment about best fit in TEAM members.
- Parent Participation in TEAM Meetings is further ensured and supported in the statement: "If a parent is unable to attend the TEAM meeting, the district will provide the parent/guardian with the opportunity to participate via conference call or tele-conference (Page 12)."

What's Missing & Points of Attention (DELTAs)::

Mindset Specific:

Equity/Equality Mindset:

- The Equity mindset recognizes that multiple external factors can come into play when scheduling and holding TEAM meetings and would make space for flexibility around the time needed in TEAM Meeting (Page 11).

Context - Neutral/Centered Mindset:

- Parent Participation in TEAM Meetings - In scheduling TEAM meetings parent's availability should be *prioritized, rather than* the language where parents are "notified of the purpose, time, and location of the meeting and who will be in attendance (Page 11/12)" after the meeting has already been scheduled.
- While the Manual states that:

"TEAM meetings are projected to last approximately one hour s All necessary facets of eligibility, IEP development and placement, should occur in this timeframe (Page 11)."

A Context-Centered Mindset would make space for flexibility around the amount of time needed for Team meetings under certain conditions including: additional documentation being brought in by parents during the meeting which needs to be considered during the TEAM meeting, accounting for any language barriers that might arise during a TEAM Meeting (Page 11).

Section Specific Recommendations

- Parent Participation in TEAM Meetings: The process should be clarified for meetings being scheduled at a mutually agreeable time between parents and other TEAM Members. If parents are not available, parents should know the steps to take in order to adjust a date and/or time that accommodates them. TEAM Meetings should be prioritized by parent availability and parents should be a main part of the scheduling process rather than being given a date and time (Page 12)
- Duration of Team Meetings: There should be more time than an hour preserved for a Team meeting, if needed. All factors under consideration may not be resolved in 1 hour and critical decisions should not be rushed. Time limit flexibility here ensures that the Team protects time to effectively consider potential factors: parents bringing in later documents during the Team meeting which are important to consider in Team decisions, English not being the first language and translator is needed.

Section: Eligibility (P 13 - 22)

What's Equitable/Working Well

Specific Mindsets Demonstrated:

Equity Mindset:

- The Specifically Designed instruction accommodations allowing students to receive information in a more effective manner aligns with an Equity mindset. The accommodations including “preferential seating, cooperative learning strategies, etc” in particular align with educators providing subjugated students in particular with individualized and additional support to achieve.

Specially Designed Instruction: Page 21

If the student only requires accommodations, then that student is not eligible for special education. General educators within the general education environment typically provide accommodations. Preferential seating, pencil grip use, or cooperative learning strategies are some examples of these kinds of typical accommodations. Accommodations do not involve modifying the material content, but do allow students to receive information in a more effective manner.

Context- Centered Mindset:

- The Specifically Designed instruction accommodations which allows students to receive information in a more effective manner aligns with the Context-Centered mindset. This approach considers the fact that students’ academic achievement is the result of a myriad of interactions with both adults and their peers inside and outside of the classroom. This provides students the opportunity to build community while in the classroom.
- The efforts to ensure parental understanding of any particular school assessment, and ensuring parents’ rights to a IEE at public expense, such that the Director of Student services informs parents of the IEE process, aligns with a Context-Centered Mindset. In particular this reflects the department’s attempt to build on home-school connections and

demonstrates an appreciation for productive parent-school relationships to ensure student achievement.

Section: Parent understanding of the evaluation data and agreement with it: Page 21 "If parents are not satisfied with a particular school assessment, parents may have a right to an Independent Educational Evaluation (IEE) at public expense, and must be provided with the letter from the Director of Student Services or his/her designee informing them of the IEE process

Other Demonstrations of Equity:

The decision making process outlined in the Manual's "Historical Review" section (Page 17) generally aligns with the equitable mindsets and consequences framework, and an overall process accountable to equitable outcomes for students and parents. In particular the following sections:

- "If information is not available to assess the aspects of the Historical Review, the referral for special education evaluation should not go forward until the school has sufficient information to determine that the student has been given appropriate opportunities to learn in the general education environment (Page 17 Component 1 Historical Review),"
- "Qualified personnel should deliver this instruction and data based documentation of repeated assessments that reflect the student's progress should be collected. This documentation is to be provided to the student's parents."

These sections in the Manual demonstrate a commitment to a data-driven, fair, equitable, and thorough process that in theory should ensure any referral for special education for students is not arbitrarily or bias-driven, but backed up and supported by measurable observations, concrete and accessible information, and facts. This is a most critical requirement in the special education referral process as without such sufficient information and evidence of equitable learning opportunities, no student should be referred for special education. This documentation should be accessible to parents to ensure the best outcomes for students.

What's Missing & Points of Attention (DELTA's):

Specific Mindsets:

Equality Mindset:

- Even though the manual explicates that:

"No matter what evaluation method used, the Team must ensure that the identified area of difficulty is not primarily the result of:

- an environmental or economic disadvantage
- an emotional disturbance
- Etc..."

It is not clear that in practice the TEAM is taking measures to ensure that these factors (i.e. economic disadvantage, or health disparities) which typically play into students' academic and social success, are being investigated in order to be properly excluded. We have not seen or been provided with records or documented indications that the Special Ed Teams has been accounting for these factors.

Avoidant Mindset:

- Even though the manual explicates that:

“No matter what evaluation method used, the Team must ensure that the identified area of difficulty is not primarily the result of:

- Cultural factors
- Etc...”

It is not clear that in practice the TEAM is taking measures to ensure that cultural factors are being explicitly investigated in order to be properly excluded. We have not seen or been provided with records or documented indications that the Special Ed Teams has been accounting for these factors.

Deficit-Framing Mindset:

- In the consideration of Disciplinary Actions in determining special ed eligibility, the manual explicates:

“According to state and Federal regulation, a **student may not be found eligible solely because the student is unable to follow the school discipline code, has limited English proficiency, social maladjustment or has lacked reading or math instruction (Effective Progress Section Page 20).**”

Aspects of the Emotional Impairment definition in the Manual (i.e. “a lack of an interpersonal relationship between educators and the students, fearful, unhappy, or demonstrating personal problems”) run a risk of educators deficit-framing their students’ demeanor or personality and are commonly associated with and responded to by Educators with **disciplinary action**. We weren’t able to determine whether the SPED department has ensured each student’s **disciplinary record** is not the cause determining a student’s eligibility for special education.

- The Manual defines a “Communication Impairment” in determining special ed eligibility as:

“The capacity to use expressive and/or receptive language is significantly limited, impaired, or delayed and is exhibited by difficulties in one or more of the following areas: speech, such as articulation and/or voice; conveying understanding, or using spoken, written, or symbolic language. (Communication Impairment Section Page 15) ”

This can be seen as a deficit framing statement in the case where educators fail to draw on students’ home and community culture and language assets. This language risks excluding numerous vernaculars and expressions (i.e. African American Vernacular English/ AAVE or LatinX vernaculars).

Context-Neutral Mindset:

- Decision on Eligibility Recommendations - In the Effective Progress Section, we see that TEAMS judge whether the lack of progress is a result of the disability - rather than parents. Educators can miss opportunities to build partnerships between the school and students’ family and community if parental voices are not included and if their concerns are not adequately addressed. See Recommendations at the end of this Section

Analysis.

- Occurrences of Team Meetings - In the Specially Designed Instruction Section (Page 21) It's stated that, "an IEP should be developed in a single TEAM meeting, after the determination of eligibility." There are circumstances where an IEP may need to be developed in more than one TEAM meeting. It may require an additional meeting if not all factors get resolved - such as in the case that parents don't have all their own documentation until that day. Some factors are outside of parental control. There should be safeguards to ensure that the IEP creation process is not only done in a specific quantity of time, but ensures quality.

Other Critical Points:

While the manual explicates on multiple occasions that in the Historical Review process is must be ensured that :

- "the student has been provided appropriate instruction in general education settings and that instruction has been delivered by qualified personnel
- "There is data-based documentation of repeated assessments of achievement at reasonable intervals, reflecting formal assessment of the student's progress of the student's progress and this documentation was provided to the student's parents."

And in determining students Participation Skills the manual addresses that:

- "As part of the student's educational history, the Team must be able to provide an assessment of the student's attention skills, participation behaviors, communication skills, memory, and social relations with groups, peers, and adults

Belmont Special Education has been unable to provide any records, in particular records of addressing these exclusionary factors listed in Section 3 of the "Area of Concern " Evaluation Method that such documents were collected, organized, or stored - such that these records could be located or provided to us. The IEPs neither demonstrate these findings, and we did not receive these records in summary documents from TEAM meetings.

In this case we are neither able to determine whether adequate documents have been recorded, collected, or used equitably according to a protocol to ensure a correct and equitable decision making eligibility process, which is a critical red flag and can be potentially harmful for students going through the Eligibility process.

Section Specific Recommendations

- Exclusionary Factors Recommendations - It is critical to note that the Manual explicitly states that:

"TEAMS sometimes struggle in trying to decide if a student is making effective progress and look for specific guidelines to assist in making this important decision. Effective progress, however, is not easily translated to test scores, academic achievement, social skills or other individual or specific variables, but rather is an interrelated measure. TEAMS, therefore, should carefully review evaluation data and make student-centered decisions on this

important issue.”

It is imperative that TEAMS collect and review evaluation data in order to make these equitable, student-centered decisions. These records and documentation should clearly demonstrate that TEAMS ensured that a student was not deemed eligible for special education without considering the Exclusionary Factors listed in the manual, as well as internal classroom influences (normal learning conditions). It is of equal importance that Teams appreciate and recognize that students of different demographics (race, gender, and ability) do experience school differently. Because of this, students' demographic backgrounds should be considered in eligibility and evaluation decision making.

- In defining “Emotional Impairment”, “Emotional Disturbances” and “Communication Impairments”, multiple equitable practices should be taken into consideration for this section. The descriptions of “Emotional Disturbances” are vague (i.e. “a general pervasive mood of unhappiness or a tendency to develop physical symptoms or fears associated with personal or school problems.”) and does not clearly outline the following:
 - which behaviors are considered inappropriate
 - the specific amount of time such behaviors may be displayed in order to count as an emotional disturbance,
 - a description of description of which learning circumstances are considered normal or any records demonstrating the student experienced normal learning conditions

These points should be more clearly specified and outlined, and data should be collected and accessible to determine that these factors were carefully considered when determining students' eligibility for determining emotional impairment and disturbances.

- Consideration of Disciplinary action and student behavior in Evaluation -

This should be prioritized. It is important educators in this case recognize they should be building on the potential and strengths that students bring to the classroom, with explicit goals of reducing the number of students referred for **disciplinary action**. Educators and Special Education staff should take all efforts to separate disciplinary action from being the primary or significant factors in determining a student's lack of progress or eligibility for Special Education. It should be noted that we received no Disciplinary data and were unable to distinguish disciplinary patterns with TEAM deliberations.

- Decision on Eligibility Recommendations -

In the case of a disagreement between the parent and TEAM, it's important to anticipate what role parents play here and what responsibilities the TEAM has in order to justify special education decisions. This process needs to be clarified in the case where there is no consensus, as there is high likelihood as well as potential high occurrence of this circumstance. (Page 20)

In this case, the TEAM should be able to provide documentation to parents that demonstrates

that Exclusionary factors (cultural factors, environmental or economic disadvantage), as well as learning environment factors (appropriate and fair quality instruction delivered by qualified personnel) have all been equitably, thoroughly, and carefully taken into consideration. The Special Education Eligibility Flowchart worksheet and Evaluation Worksheet should become part of the student record and should be provided to parents to justify decisions in the case of disagreements. In the case that the SPED department is unable to do this, we recommend that students not be placed in the Emotional Impairment category until the school is able to provide this information.

Section: Independent Educational Evaluations (IEE) (Page 22 - 24)

What's Equitable/Working Well:

Specific Mindsets Demonstrated:

Equity Mindset:

- The Manual's reference to parents' entitlement to a publicly funded IEE demonstrates an Equity mindset (Page 22) ; it acknowledges that societal structures disadvantage some students economically and informs parents of their options where they are unable to pay out of pocket.

What's Missing & Points of Attention (DELTA's):

Mindset Specific:

Context - Aware/ Neutral Mindset:

- The Special Ed department should ensure that the letter from the Administer of Special Education outlining the requirements for requesting an IEE (Page 23) has been received by the parent. See Recommendations.

Section Specific Recommendations

The formal letter sent to parents from the Admin of Special Education should have a process ensuring parents' recipients, in particular in the case of potential miscommunication with the parents. The recommended process might include the following:

- First clarify the mailing address with the parent before sending.
 - There might be a second letter mailed just in case.
 - Follow up with the parent via phone call or digitally (via email) to confirm the letter has been received.
-

Section: IEP Development (Page 24 - 27)

What's Equitable/ Working Well:

Specific Mindsets Demonstrated:

Equity Mindset:

- The IEP can be amended at any time based on the student's performance and development.
- Accommodations, schedule modifications, and changes are all based on individual student needs.

Asset - Framing Mindset:

- Student empowerment is apparent in allowing their voice to be reflected in their IEP, allowing them to be their own leaders.
- Maintains high standards for all students with disabilities.
- Vision statement allows students to asset-frame their future and give them a chance to frame who they want to develop into and asset-frame their qualities.

What's Missing & Points of Attention (DELTAs):

Mindset Specific:

Avoidant Mindset:

- Vision statements are avoidant of other contributing factors that could be causing certain behaviors, places responsibility on students to control the environment and other factors out of their control, and can place an unreasonable amount of pressure on students.

Context-Neutral Mindset:

- The emphasis on parent voice via statements being "focused and concise" leaves room for parent involvement to be disregarded and/ or not taken seriously. These requirements don't consider family education level or language background.

Section Specific Recommendations

- Consider that Vision statements could be influenced by other factors rather than age.
- Students can be involved in their vision statement sooner than 14 years old. We recommend that in some circumstances students be given the *option* to voice their vision from kindergarten, without being delayed until age 14.

Section: Extended School Year Services (Page 28)

What's Missing & Points of Attention (DELTAs):

Mindset Specific:

Avoidant and Equality Mindset:

- Language doesn't acknowledge that certain students are at greater risk of academic regression. This is potentially harmful in that affluent, usually white families can afford extracurriculars and summer activities/programs, whereas Black and other families of color and lower economic status, are less likely to afford these activities. The "all children have the potential" ignores these patterns.

Context-Neutral Mindset:

- Content and considerations exclude significant life and community events in student's lives that could contribute to the need for extended school year services.

Section Specific Recommendations

- We recommend including a holistic history that covers all mindsets of student experience at school(s) when deciding if ESY is needed.
-

Section: Special Considerations (Page 29 - 30)

What's Missing & Points of Attention (DELTAs):

Mindset Specific:

Avoidant Mindset:

- There is no acknowledgement of how dominant student populations could negatively and directly impact learning outcomes for their peers, i.e. contributing to racism, classism, and ableism and/or how staff will address these happenings

Section Specific Recommendations

- **The Massachusetts Bullying Prevention and Intervention Law Section:** To highlight an aware mindset, include a note or section in the law (G.L. c. 718, §3, as amended by Chapter 92 of the Acts of 2010) that addresses race and class as a factor of socialization being impacted - student background should be considered when discussing bullying, harassment, and teasing because children may be saying racist, classist, or other hurtful comments when adults are not around. For example, on the playground, cafeteria, afterschool, in zoom breakout rooms, etc.
- Include Samples of Out of District placement include a kindergarten student with autism being vulnerable to bullying. We recommend discussing with students in early education about differences in their peers - in this case, ableism, so student doesn't have to move to different campus

Section: Placement (Page 31)

What's Equitable/ Working Well:

Mindset Specific:

Equity Mindset:

- IEP services by BPS team are available to all eligible students regardless of where they attend school

Section: Transition Planning (Page 32- 37)

What's Equitable/ Working Well:

Mindset Specific:

Equity Mindset:

- Special ed. Liaison working directly with teachers to incorporate accommodations for centering students' individual needs.
- TA's give targeted, goal-oriented support to students.

Aware Mindset:

- Planning includes great opportunities for students to asset-frame themselves and translate that to what they want to do in their adult life.
- Center's goal is to improve student access to curriculum independently is a great example of asset -framing.
- Positive behavioral supports are implemented using applied behavioral techniques (*but doesn't say anything about disciplinary actions so that could be a piece of the asset mindset here*).

Asset- Framing Mindset:

- Students receiving a summary of their performance has a ton of potential for students to see themselves asset framed into a vision

Context-Centered Mindset:

- Planning includes great opportunities to center students' backgrounds and context.
- Trades, living arrangements, social support and community access are all available for students - assuming they are tailored to students needs/ context.

What's Missing & Points of Attention (DELTAs):

Mindset Specific:

Avoidant Mindset:

- Lacking any mention or protocols of disciplinary actions and how they are considered in a positive behavioral support system.
- As long as integrated classrooms are labeled with consistent structure and routine, the responsibility is on the student to create successful interactions with teachers and peers - (autism inclusion program).

Deficit - Framing Mindset:

- If students' needs aren't met and they are moved to another district, there is a possibility that their needs were deficit-framed.

Section Specific Recommendations

- We recommend that language reflect the guidance students will receive to focus on their assets and help translate their challenges/ (deficits) to an Asset-based language/ approach.
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General Recommendations Summary

- **General Equity Standards and Mission** - The Manual lacks an overall tone, mission, and description of Equity goals. The language attending to social, economic, racial, cultural factors is sparse. In particular, race and socio-economic factors are rarely or never mentioned. This could be reflective of a lack of a shared overall mission or guiding Equity framework across the Special Education department. We recommend that the Procedural Manual, starting with the Introduction, be a place to outline, define, and explain how equitable practices will be enforced throughout Special Education.
- **Team Selection, Proceedings, and Chairperson** - We recommend that all steps be taken to ensure the most appropriate persons and Chairperson are assigned to students Teams. Team members and leaders should be properly vetted, have a strong and reciprocal relationship with students, and they essentially should be able to address and express each of the equity mindsets and consequential practices expressly outlined in this report (Equitable, Aware, Asset-framed, and Context - Centered).
- **Data (Documentation and Records) Collection, Sharing, and Usage** - A majority of data that would reflect equitable decision-making processes across Belmont Special Education is not readily available. This data, in particular those records involved in “Eligibility and Historical Review” proceedings, should be efficiently exchangeable between the school teachers (building administration) and the Special Education department. There does seem to be a gap between where these documents exist and are shared. It’s not clear that these original records are organized in a way that SpED staff can locate or share them; our auditors did not have access to them.

We recommend a rigorous data collection and storage process in determining that students have been provided appropriate instruction in general education settings, and that instruction has been delivered by qualified personnel. There should also be data-based documentation that explicitly investigates exclusionary factors including students’ cultural factors, racial, environmental or economic disadvantages, and disciplinary actions in all Special Education decisions. As part of the student's educational history, the Team must also be able to provide an assessment of the student's participation behaviors, communications, and social relations with groups, peers, and adults. We strongly recommend that this documentation be available to students’ parents.

It is also critical that where the manual dictates records and documents be collected and included in eligibility proceedings, that these records are actually collected and available in the decision making Team meetings, conversations and resolutions with parents, and for external audits.

Limitations and Conclusions

Due to various work constraints, virtual constraints, scheduling, and other factors outside of our control there are topics and issues that we could not cover in this report. These limited areas of assessment include student input, special education classroom observations, and evaluating Team/Parent dynamics.

It is critical to note that any impartial implementations of our recommendations do not ensure equitable practices, nor that the language in the Special Education Procedural Manual directly translates to actual practices and procedures employed by the Special Education team. It should be noted that this audit alone is unlikely to improve Special Education students' experiences, learning, and achievement.