

A Study of the Office of Student Services
Milton Town School District
Milton, Vermont
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On January 7, 2010 the Milton Town School District School Board (the Board) agreed to arrange for an independent audit of the Office of Student Services (OSS). The Board contracted with Zelda Zeleski, ED.D (the consultant) to conduct a study of the Milton Town School District's OSS organization and its leadership, including recommendations for changes to be made moving forward. It was agreed that concerns about individual employees, if any, would be shared directly with the superintendent rather than the Board, since he is responsible for personnel evaluation.

The study included two phases: a program audit and a program inquiry. Phase I consisted of a review of documents, facts, figures, policies, procedures, action plans and staffing currently in place. It assessed the current status of the Milton OSS Organization. Phase II involved gathering input by interviewing 10 parents/community members (community members), 16 teachers/professional staff (professional staff), 5 instructional assistants/support staff (support staff) and 9 administrators. Board members selected the community members interviewed. Professionals and support staff were asked to contact the consultant if they desired an interview. The consultant attempted to choose interviewees who represented the span of grade levels from preK-12. The intent of Phase II was to listen to the experiences and concerns of individuals in each interview group. In addition, the consultant wanted to understand the perceptions, beliefs and values of the OSS administrators and school personnel interviewed.

The Milton Town School District

The Milton Town School District (MTSD/the District) is comprised of the Milton Elementary School (MES), Milton Middle School (MMS) and Milton High School (MHS). The Elementary school is very large, relative to other Vermont elementary schools with 959 students preK-6. The Middle and High School has a combined population of 851 students. The Superintendent and other Central Office staff, including the OSS, are located in the Elementary School building.

The Elementary School is in year 4 of corrective action as a result of not meeting adequate yearly progress (AYP) requirements under No Child Left Behind for students receiving free and reduced lunch and for students with disabilities. The Milton Elementary School Improvement Plan and the OSS Action Plan focus on increasing achievement levels.

Over the past several years the MTSD has had frequent changes in superintendents and administration at MES. The current principal has been in that position since 2007. She was an assistant principal at MES for the two years prior to being appointed principal. There are two assistant principals at MES. One has been in her position since 2008 and the other was hired in 2009. There have also been changes in the administrative model at MES. In contrast, the administration at MMS and MHS has been stable with one of the co-principals in her 11th year as administrator at the school and the other co-principal in her 7th year in the position. The assistant principal is in his 2nd year in that position. The OSS Director has held his central office position for seven years. The position of assistant director of the OSS has been in existence for six years. The current Assistant Director is in her 2nd year in the position.

PHASE I: OSS Program Audit

The Milton OSS consists of a director of student services, an assistant director of student services, and an administrative assistant. Working in the schools (preK-12) are 27.7 FTE special educators, 5.7 FTE speech pathologists, 44 FTE instructional assistants, 12 FTE intensive needs program specialists, 2 FTE communication facilitators and 1 FTE job developer. The OSS oversees special education services for eligible students pre K-12 and students who are protected under Section 504 of the Rehabilitation Act of 1973 (Section 504). In response to the annual child count conducted by the State Department of Education in December 2009 the OSS reported 286 pre K-12 students eligible for special education. Currently the OSS reports 70 K-12 students protected under Section 504.

A review was conducted of the State Department of Education data on special education due process filings, administrative complaints and requests for mediation for school districts in Chittenden County between January 2006 and April 15, 2010. During that time period MTSD had two due process complaints filed. One was dismissed with a mediated agreement and the other was withdrawn. Due process complaints filed in other Chittenden County school districts ranged between two and five. MTSD, along with all but two other Chittenden County school districts, had two administrative complaints filed during the same time frame. One school district had one administrative complaints filed, while a second district had none. MTSD, along with two other Chittenden County districts, had two requests for mediation. One Chittenden County school district had one request for mediation. The remainder of the Chittenden County districts had a range between five and nine requests for mediation during the period between January 2006 and April 15, 2010

The OSS shares responsibility for day-to-day supervision of special educators with the building administrators. Evaluation of special educators is the responsibility of the OSS administrators. Special educators and speech pathologists supervise instructional assistants and program specialists. Job descriptions have been developed for special education administrators, special educators, speech pathologists, para-educators/instructional assistants/individual assistants, communication facilitator and intensive needs program specialist. The OSS hosts a Wiki for the purpose of collaboration and dissemination of important resources and information to the special education staff. Special educators are expected to view the site frequently.

An OSS program evaluation and system analysis initiative has been ongoing since the beginning of the 2008-2009 school year. An extensive compliance review of District IEPs was conducted as a component of the evaluation and as part of the Elementary Schools Improvement Plan. The evaluation and system analysis resulted in an OSS Action Plan for the 2009-2010 school year. Based on the MTSD goals, the OSS identified sub-goals on which to focus in order to (1) improve student achievement in reading, writing, mathematics, science and social studies, (2) enhance the social emotional and behavioral development of students, and (3) operate with fiscal integrity, efficiency and effectiveness.

The MTSD has a policy on Student Conduct and Discipline. Students with disabilities are covered under the MTSD policy to the extent possible in keeping with the Vermont Department of Education Special Education Regulations and the Vermont State Board of

Education Manual of Rules and Practices. These documents contain extensive regulations related to the discipline of students with disabilities and override local policy in instances where there is conflict in language or action required. The Elementary School is implementing a systems approach to academic achievement and social competence for all children called Positive Behavioral Supports (PBS). The Vermont State Department of Education encourages the use of this approach and describes it on their web site (http://education.vermont.gov/new/html/pgm_ess/pbs.html) as follows: “ In this systems approach, the focus is not placed initially on the individual student, but on the environment within which the student functions. Adjustments are made at the district, school, classroom and where indicated, the individual level in order to effect the best possible outcome for academic and social competence for all students. These adjustments are considered to be “universal” applications. Supports and interventions are provided with progressive focus and intensity for small groups and individuals in addition to school-wide efforts. With this approach, school-wide change efforts have the best chance of improving outcomes for all students, including those with disabilities who might otherwise require instruction outside the classroom or school.” PBS requires organizational change and data based decision making for evaluation and self-correction.

There are no State required policies for special education. The Board has adopted one special education policy on Independent Educational Evaluations. The Milton Elementary School Handbook for parents and students contains information about many topics, including Section 504 but does not mention special education services. The Middle and High School student handbook also contains information about Section 504 but not special education services. There is a link on the Middle/High School web site for information about the Student Services Department, which is responsible for the delivery of special education services.

Audit Findings

The District count of students eligible for special education is in line with the last available State average count of eligible students. The number of requests for due process hearings, administrative complaints filed and mediation sessions held from January 2006-mid April 2010 is not exceedingly high. Job descriptions have been developed for the various student service positions and a clear delineation of evaluation responsibilities of special educators is evident in the documents reviewed. Technology (WIKI) is effectively used for collaboration and dissemination of information.

The OSS approach to education is student centered, with instruction grounded in research on evidence based best practices in educating students with disabilities. Decisions are extensively data based. The OSS approach to program evaluation, systems analysis, action plan development and measurement of progress is impressive and could be used as a model for other school districts searching for a comprehensive method of program evaluation and system analysis.

OSS initiatives and general education initiatives are closely coupled, as evidenced by the OSS action plan goals and the Elementary School’s Improvement Plan, including the K-6 school-wide implementation of PBS and Teacher Learning Communities (TLCs).

PHASE II: OSS Program Inquiry

Interviews

Forty interviews were conducted during Phase II of this study. Board members submitted the names of parents whom they thought would be interested in taking part in the study primarily because they had voiced concerns either personally to board members or at school board meetings. In one case, a parent had been working with the MES administration in an effort to establish parent information sessions and discuss positive approaches to other school efforts. The community members interviewed do not represent a random sample of community members in the district or of parents of children eligible for special education and, therefore, may not reflect the thinking of the entire community. Sixteen professional staff and five support staff were interviewed out of twenty-six who asked to be placed on the list of potential interviewees. Only those who asked to be placed on the list were included in the group from which the consultant selected those to be interviewed. As is the case of the community members, this does not represent a random sample of the school staff. In addition, the consultant interviewed the superintendent, six building based administrators and two student services administrators. The consultant requested interviews with all of the administrators mentioned above.

Community members were asked to share with the consultant their experiences with the OSS. The consultant asked clarifying questions. All other interviewees were asked general questions intended to allow the participants to share their views. In addition, the consultant asked questions intended to elicit specific information. Detailed notes were taken at all interviews. Some interviewees gave documents to the consultant. Once all interviews were completed the consultant identified key ideas expressed in each interview. Themes within interview groups (community, professional staff, support staff and administrators) were then compiled (see lists below). The number noted after each theme indicates the number of interviewees in the group who offered related information on their own or in response to one or more of the questions asked during the interview. If only one member of a particular interview group mentioned an item it was not considered a theme and is not reported in the lists below, though it may be addressed later in the report. Themes from each group are listed below.

Community Members (10) Themes

1. Services for students eligible for special education or protected under Section 504 (7)
2. Safety of students and staff related to possible injury from students with behavioral issues and/or disabilities, discipline (3)
3. Family Rights and Privacy Act (FERPA) incident (3)
4. Concerns about trusting the OSS Dept. (2)

Teacher/Professional Staff (16)

Themes

1. Discipline of all students, dealing with behavioral issues, lack of planning room effectiveness at MES (10)
2. Not supported, not respected by building administration (MES)(10)
3. Not supported, not respected by OSS administration (6)
4. Lack of adequate communication in general (MES) (5)
5. OSS Department is very supportive and responsive (5)
6. Too many initiatives in general (MES) (3)
7. Instructional assistant assignment changes made without notice (MES) (2)

Instructional Assistants/Support Staff (5)

Themes

1. Family Rights and Privacy Act (FERPA) incident (2)
2. IEP services (2)
3. Reduction in the number of IAs next year at MHS (2)

Building Administrators: MES (3) MMS/HS (3)

Themes

1. OSS administrators are responsive and effective (6)
2. Chain of command is consistently followed at MMS/MHS (3)
3. Chain of command is *not* consistently followed at MES (3)
4. Teachers and administrators work well together at MHS (2)

The consultant specifically asked the professionals and administrators (building based and OSS) about their philosophy of educating students with disabilities. Nine out of 16 professionals said they *did not* know the philosophy held by their building principals. Of the seven professional who thought they knew the philosophy of their building principals, six were correct. Five professionals out of 16 said they *did not* know the philosophy of the OSS administrators. Of the eleven professionals who thought they knew the philosophy of the OSS administrators, only 7 were correct.

INQUIRY FINDINGS

While this study was intended to be one of the functioning of the OSS, with few exceptions those interviewed expressed concerns about systemic (school or district) issues as opposed to strictly OSS issues. The vast majority of the systemic issues were related to the Elementary School, as opposed to the Middle and High School.

The OSS administrators hold high expectations for achievement for all students, including those with disabilities. They believe given the right instruction most students with disabilities can perform on grade level. They have high expectations for themselves and building administrators who must assist in paving the way for that achievement. They also hold high expectations for general and special education professionals and support staff working with students. At times this creates unwanted stress, especially for those

who don't hold the same beliefs about the abilities of children with disabilities. The work being attempted by the OSS is adaptive work and it requires change in values, beliefs and behaviors. It is some of the most difficult work for those in leadership positions. The OSS approach is very straightforward and at times the OSS administrators may be perceived as too focused on data, long range planning and the "big picture" and not focused enough on relationships.

It was not surprising to find the parents of students with disabilities interviewed had concerns about the OSS. The parents were selected for interviews because they had expressed concerns prior to this study. An analysis of relationships with a much larger randomly selected group of parents of students with disabilities would help determine if an overall adjustment in approach to working with parents is advisable. This is addressed in more detail in the Issue/Recommendation section below.

There were conflicting reports from professionals about their experiences working with the OSS. Some professional staff said they did not feel supported or respected by the OSS. Other professional staff reported the OSS is very supportive and responsive. Some said the OSS was always changing their approach. Others said they appreciated being "pushed" to stretch as professionals and while it was hard, the change resulted in growth. Another professional simply said: "Never underestimate the resistance to change."

The building administrators and the OSS administrators appear to work well together and have a healthy respect for one another. The fact that the central office is located in the Elementary School to some degree shapes the relationship the OSS has with the Elementary School staff and administration in general. One has only to read the MES Improvement Plan to gauge the involvement of the OSS administrators in the work of the teachers and administrators at MES. A review of the 2009-2010 Improvement Plan goals and timelines also helps to explain why the MES teachers, building administrators and OSS administrators may be feeling some pressure and related stress.

Several interviewees commented on the fears *others* had about OSS intimidation and retaliation but did not give personal examples of such experiences. Only one person interviewed gave a personal and specific example of what she felt was retaliation. This consultant looked into the situation and did not find retaliation had taken place. Without being present to observe and discuss with parties involved in a specific interaction that resulted in someone feeling intimidated, it is almost impossible to determine intent. Because someone *feels* intimidated does not necessarily mean the *intent* was to intimidate. A position of authority held by one person can also result in a feeling of intimidation on the part of another.

Issue Analysis and Recommendations

The analysis presented below reflects the opinion of the consultant based on documents reviewed and interviews conducted with a limited number of community members, professionals, support staff and administrators.

Issue #1: Parent Discontent

The six community members interviewed who have children with disabilities were most concerned about their children receiving the services they need in order to be successful in school. These parents were frustrated because they felt the school district

had refused to provide services parents thought their children should have and/or because they believe the school district did not provide services that had been agreed upon in written plans and/or they believe the district failed to recognize the support their child needed. Some parents felt they were not heard or that their opinions did not matter.

It was beyond the scope of this study to investigate details of individual student's cases. In order to protect the confidentiality of those interviewed and their children, specifics of individual student will not be discussed in this report. It is clear, however, that the parents interviewed would have benefited from information about special education, Section 504 and the limits of responsibility on the part of the school district. Lack of information led, in part, to a breakdown in communication and trust between the OSS and parents. All of the concerns mentioned by parents related to IEP services have been brought to the attention of the OSS by the parents. Some date back many years and have been resolved. In other cases, students have graduated or no longer attend Milton schools. Still others continue to be the focus of serious discussion with the building administration and/or the OSS.

Differences of opinion and disagreements between parents and school districts were anticipated when the Federal law and State regulations governing special education were written. Due process, administrative complaints and mediation are methods used to resolve conflict and are included as such in the Vermont Department of Education Special Education Regulations. While the most desirable situation would be to have an absence of conflict with parents, the extent to which MTSD has been involved with due process, administrative complaints and mediation has been limited. Assessing the level of discontent on the part of parents of students with disabilities, understanding the underlying causes of the discontent and identifying steps to be taken to improve relationships is a first step toward reducing conflict and improving relationships.

Recommendations:

1. Solicit feedback from a sizeable random sample of parents of students with disabilities to ascertain the level of district wide parental satisfaction or discontent. A parent survey could be used for this purpose. The OSS already has an excellent format for evaluating program effectiveness called LODAM. Consider using this format to reflect the research on best practices for working with parents of students with disabilities and to assess the district's current status in this area. If indicated, an action plan should be developed based on the assessment results.

2. Provide written information for parents about educational support teams (EST), special education and Section 504, as well as other support services that are available in the district. Include a flow chart of the special education and Section 504 processes. Refer to the chart at IEP or 504 meetings so parents understand where their child's Team is in the process. Post information on the district web site. Aim for transparency.

3. Develop a written procedure for the review of available information on students new to the school. The building administrators, OSS administrators and school nurse(s) should be involved in the development of the procedure to ensure immediate and appropriate action is taken when there is medical information that requires a response and/or plan, or other information that points to the need for monitoring, data collection and/or a referral for support services (guidance, special education, Section 504, etc.).

Issue #2: Philosophy

It is not clear that administration and staff are working together toward common goals and have shared beliefs about the education of all students. At least half of the professional staff interviewed from both MES and MMS/MHS was not aware of the philosophy of educating students with disabilities held by their principals and/or the administrators of the OSS. In the best situation the philosophy and core beliefs of the superintendent, principals, central office administrators and teachers would be aligned. At a minimum, there should be an understanding on the part of the teachers of the guiding philosophy, core beliefs and related expectations held by the administration.

Recommendation:

The current MTSD policy on Philosophy of Education was adopted in 1988 and is overdue for review. Hold in-depth discussion with staff about their philosophy of educating all students. Include discussion about beliefs related to education of students with disabilities. Adopt core belief statements that will remain in place despite a future turnover of administrators and teachers. Use them as a guide when establishing expectations and making decisions.

ISSUE #3: Discipline and Behavior

Student behavior and discipline was not expressed as a concern at the Middle and High School. Concern was voiced about discipline and the safety of students and staff at MES. Professionals at MES have strong feelings about student behavior and discipline of all students. There is a belief on the part of some that there are no clear expectations or consequences for student behavior. Some teachers believe it is not their responsibility to deal with behavioral issues in their classrooms. The building and OSS administrators believe otherwise. There is a concern on the part of professional staff about the level of support/expertise at MES for dealing with challenging behaviors. The planning room is thought to be ineffective.

MES is implementing Positive Behavioral Supports (PBS) as a systems approach to academic achievement and social competence for all students. This approach involves an evaluation of the school environment on a district, school, classroom and individual level. It involves changes that will have a long-term impact on how the school addresses issues, including unsafe behavior. The challenge is supporting students, staff and administrators in the short term while embracing this long-term approach in the early stages of implementation.

Recommendations:

1. Review and revise planning room procedures and practices with the goal of strengthening the effectiveness of dealing with unacceptable behavior. Since the effectiveness of the planning room was an issue for the professional staff, their input should be sought when making revisions to the procedures and practices.
2. Review, revise and /or develop a crisis intervention response and supports that will decrease the likelihood of staff and students being injured in the short term while the school continues to implement PBS.

3. In cases where the troubling behavior is the result of a disability, additional training for classroom teachers, special educators and/or support staff specific to the individual students and/or disability may be warranted. When additional training does not lead to the desired results because of inability to implement strategies, consider making changes in staff assignments.

ISSUE #4: ADMINISTRATIVE TURNOVER

The Middle School and High School co-principals are experienced, have been in their positions for many years and have taken advantage of an ongoing mentoring relationship with a highly skilled professional. The assistant principal is new in his position and his beliefs appear to be in sync with the co-principals.

Frequent turnover of administration, along with the corresponding change in leadership models, have contributed to the stress professional staff is experiencing at the Elementary School. The feeling on the part of the staff is that abrupt change in direction and priorities has become the norm rather than the exception. Administrators are also challenged by frequent changes in administrative colleagues and leadership models.

Recommendation:

A highly skilled mentor should be available to all building administrators. As administrative openings occur at MES the Board should make a concerted effort to fill the vacancies with very experienced and highly successful building administrators. Potential candidates should have core beliefs that are in line with those held by the district. Initiatives that have been started and are proving to be successful should remain in place.

ISSUE #5: COMMUNICATION

The Middle and High School administration and staff appear to have developed successful approaches to communicating and solving problems internally. The principals reported when staff has a concern or problem they go to their supervisor first and then up the chain if concerns are not addressed. Communication at MMS and MHS appears to be effective.

Those interviewed from the Elementary School acknowledged there is a chain of command to be followed when an employee wants to express a concern about an issue at the school. Both professionals and administrators reported the chain is not always followed. It was reported some professionals, support staff and community members go directly to board members instead of addressing issues with appropriate school professionals or administrators.

A community member also had a concern about lack of communication with parents when there is an issue in their child's classroom.

Recommendations:

1. Administration and Board members should consistently remind staff that there is a chain of command to follow and that the expectation is that they do so.

2. All board members should refer members of the public to the appropriate person in the school system when concerns are brought to them directly. Individual board members should not attempt to resolve problems for individual community members.

3. Develop a protocol for reporting incidents to parents. Include the general types of incidents to be reported to parents, the person responsible for writing the message, and the person responsible for reviewing the message prior to sending it home. Getting the message home in a timely manner is critical. Maintaining confidentiality (FERPA) is essential.

ISSUE #6: FERPA

The Family Rights and Privacy Act (FERPA) is misunderstood by many teachers, instructional assistants, parents and community members. It is the opinion of this consultant the OSS and Elementary School administrators responded appropriately to a recent incident related to FERPA at MES.

Recommendation:

Provided training to ALL employees by someone outside the school district who has expert knowledge of FERPA. A session should also be held for school board members with community members invited to attend.

Conclusion

The strengths of the OSS Department include program evaluation, systems analysis, effective use of data in decision-making and building positive relationships with fellow administrators and like-minded professional colleagues. The high expectations held by the OSS for all students, a commitment to effective instruction and a desire to be involved in work on behalf of all students is a benefit to the District. Areas in need of attention include building trusting and respectful relationships with those professionals and support staff that feel less supported and valued by the OSS. In respect to relationships with parents, information about the level of satisfaction and /or discontent on the part of a random sample of parents of students with disabilities needs to be gathered and analyzed. Regardless of the outcome of such an analysis, an attempt to repair existing relationships that are strained is recommended.

The causes of the turmoil in the Milton School District are many and interwoven. Some are addressed in the recommendations made in this study. Others go well beyond the scope of this study and well beyond the Office of Student Services.

Respectfully Submitted,

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