

**Re: Public testimony on Student Achievement Committee April 5, 2016 agenda item: Better support for special education inclusion in the Department of Education** by increasing “Universal Design for Learning” UDL.

To: Patricia Halagao, **Student Achievement** Committee Chairperson

From: Debbie Anderson, Waiakea Intermediate School, to support more inclusive UDL practices across the DOE

Searching our DOE website yields no result for “Universal Design for Learning” UD/UDL, though the National Center on UDL lists State Documents that Mention UDL or UD <http://www.udlcenter.org/advocacy/state/hawaii>:

- UD in Race to the Top application in relation to assessments
- UDL in State Performance Plan
- UD in Annual Performance Report in relation to increasing student performance in general education classrooms
- Other Activities: Governing state of the SMARTER Balanced Assessment Consortium - committed to developing the next generation of assessments using UD principles

Given that our state DOE documents “mention” UDL, shouldn’t our BOE/DOE provide more information, training and guidance on implementation of UDL?

The following quote comes from Friday April 1st's newly released ESSA draft guidelines on Assessment:

"Be developed, to the extent practicable, using the principles of universal design for learning. Under this section, the term “universal design for learning” means a scientifically valid framework for guiding educational practice that--

(A) Provides flexibility in the ways information is presented, in the ways students respond or demonstrate knowledge and skills, and in the ways students are engaged; and

(B) Reduces barriers in instruction, provides appropriate accommodations, supports, and challenges, and maintains high achievement expectations for all students, including students with disabilities and students who are English learners."

As both of these subcategories are important significantly, increasing faculty usage of UDL seems invaluable. SPIN Hawaii's newsletter promoted UDL in a Special Edition: <http://spinhawaii.org/wp-content/uploads/2014/10/2015-Special-Edition.pdf>

“The objective of UD is to apply a specific set of principles to systematically incorporate accessible features into a design rather than retrofitting changes or accommodations (Shaw, 2002).” The University of Hawaii has a short online *UDL* course available and promotes UD usage [http://hilo.hawaii.edu/studentaffairs/uds/universal\\_design.php](http://hilo.hawaii.edu/studentaffairs/uds/universal_design.php). From October 2008 through September 2011, faculty from the UH Center on Disability Studies (CDS) provided training to their faculty and staff using validated and practical strategies in multiculturalism, UDL, and mentoring. Each area of expertise was developed into one integrated module and three component modules. In the Teaching All Students, Reaching All Learners project, CDS staff will assist faculty to focus on learning skills such as:

- 1) using Universal Design for Learning (also known as Universal Design for Instruction or UDI),
- 2) increasing knowledge about working with students from many cultures, including cultures of disabilities, and
- 3) enhancing comprehension of mentoring. These skills can improve quality of teaching, research, and publication, assisting faculty in promotion and tenure and lead to improved student learning. For general project information, contact Kelly Roberts, Project Coordinator at: [robertsk@hawaii.edu](mailto:robertsk@hawaii.edu) or 808-956-0996. For more information or to receive Professional Development Training on implementing these modules please contact: Megan Conway, Training Coordinator at: [mconway@hawaii.edu](mailto:mconway@hawaii.edu) or 808-956-6166. See also Rao, Kavita. (2015). An Exploratory Study of Universal Design for Teaching Chemistry to Students With and Without Disabilities *Learning Disability Quarterly* May 1, 2015 38: 84-96

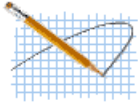
A **Crosswalk Between Universal Design for Learning (UDL) and the (Danielson) Framework for Teaching** is available <https://www.danielsongroup.org/special-education/>: “As teachers strengthen their practices by infusing the principles of UDL in their work, their performance within the Framework will improve. This instrument explicitly provides teachers with the critical connections they need to enhance their planning, instruction, and professional practice.”

Please help DOE teachers implement UDL to support more inclusive practices.

Sincerely,

Deborah V. Anderson, NBCT, MLIS, M.Ed. (Learning Disabilities)

Fax via 974-4000 6-3433# [boe\\_hawaii@notes.k12.hi.us](mailto:boe_hawaii@notes.k12.hi.us)



Alan Isbell <writenow808@gmail.com>

04/03/2016 10:03 AM

To boe\_hawaii@notes.k12.hi.us  
cc  
Subject SPED testimony for April 5 hearing

Honorable Board of Directors,

Making SPED her top priority comes too little, too late for Sup. Kathryn Matayoshi. DOE has crept back back to pre-Felix times, and the result will be another decree costing the state billions if not totally reversed.

Inclusion has been used inappropriately by DOE on pressuring SPED teachers to disregard IDEA provisions that had pull-out among the options for least restrictive environment. Inclusion can be a great option when used appropriately. But even for candidates who actually qualify for inclusion, there still must be enough assigned SPED teachers to make it work as designed.

Good SPED is expensive. Court-ordered decrees can be even more so.

Mahalo,

Alan Isbell

Fourth-grade teacher

Wailuku Elementary

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COMMUNITY CHILDREN'S COUNCIL OF HAWAII  
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April 3<sup>rd</sup>, 2016

TO: Board of Education – Student Achievement Committee

RE: Presentation on understanding the Comprehensive Student Support System from a special education perspective;  
Presentation on special education inclusion in the Department of Education

Dear Committee Chairperson Halagao, Committee Vice Chairperson Williams, and Members of the Committee,

The Community Children's Councils (CCC's) **supports CSSS and Inclusion** with recommendations.

The CCC's support the testimony of SEAC. CSSS is integral to student achievement. The Parent Teacher Student Association (PTSA) made recommendations of core principles that were incorporated in CSSS. The CCC's recommend the integration of family school partnerships throughout all documents including but not limited to Response To Intervention (RTI), Positive Behavioral Supports (PBS) and Chapter 19.

Inclusion is essential to providing children support in the appropriate least restrictive environment (LRE). Through co-teaching children are able to move from more restrictive placements such as a SPED classroom, to the integration with their general education peers in a mainstream environment, when appropriate. In order for inclusion to be successful support from the administration is crucial and there must be time for proper planning between teachers prior to the lesson. Currently children ages 3-5 are not able to be included with mainstream peers who are their age.

The CCC's request family and community representation throughout the training process of CSSS in addition to be a member in the collecting and substantiation of data in order to determine the efficiency of programs.

The 17 CCCs are community-based bodies comprised of parents, professionals in both public and private agencies and other interested persons who are concerned with specialized services provided to Hawaii's students. Membership is diverse, voluntary and advisory in nature. The CCCs are in rural and urban communities organized around the Complexes in the Department of Education.

Should you have any questions or need additional information, please contact the Community Children's Council Office (CCCO) at 586-5363.

Thank you for considering our testimony,  
Jessica Wong-Sumida, Chair

(Original signatures are on file with the CCCO)

April 3, 2016

Aloha BOE members,

RE: SAC presentation on Special Education

### **OPENING THOUGHTS**

This subject like many others is very dear to my heart. When I talk about this being about **ALL** stakeholders, it is from my experience of knowing what has worked for my students and their 'ohana as well as me.

Throughout my forty years of teaching in public schools, it has been my honor to work with hundreds of students in 3 different states and Japan. One of my most valuable experiences in teaching occurred at Ewa Elementary where I taught kindergarten. It was my privilege to help Principal Irene Nakamoto and the school community with its first inclusive kindergarten in the 1990's. It was a year of all that is positive about inclusion and also the challenges that come with it. Since then, I have had the opportunity to work with some amazing co-teachers, students and parents in inclusive classrooms. I once again, offer you my time and the sharing of my experiences to meet the needs of **ALL** of our stakeholders by meeting with any of you.

In the meantime, I would like to address these thoughts after reading through the OCISS power point presentation.

The presentation looks at seven areas. I will address the following from that overview:

1. Special Education
2. What is inclusion
3. How to implement inclusive practices

### **I. SPECIAL EDUCATION**

I believe that one of the essential changes to our pursuit of assisting **ALL** students with their special educational needs is a change in our language. Special education by definition is teaching modified to serve students with special educational needs. This is true technically for every one of our students. At this time, I believe that many people do not understand that our students often fall into more than one category. **For example**, I know a high school student who is houseless, speaks a first language other than English and has an IEP, who has basically stopped going to school due to the

challenges of having her needs met. We need to work on equity in all high needs categories. It is part of inclusion.

If our goal is the inclusion of **ALL** students then our language when talking about students needs to change to be inclusive as well. It is important that we throw out the term “SPED” from our vocabulary. In its current use, the term SPED in the community, schools conveys a derogatory, “something we have to deal with” attitude. Examples: “How many SPED kids did you get on your roster, I only have two?” “Why you leaving in the middle of our lesson, oh yeah, you are SPED.” There are many more examples. Use in this form implies that SPED is not part of the “normal” continuum of life in schools. By using the acronym SPED I believe before we even get to the students, we have done the complete opposite of inclusion and often lead to bullying and other issues. I am completely aware that students with special needs bring an assortment of challenges to schools. Special needs for our purposes in this discussion are ones that present challenges to students to their learning in schools. An important reminder that this can be the need for glasses or to sit on a chair of the right height to the extreme of needing complete assistance in all functions including the change of diapers. It is my thought that schools need to realize that they are a representation of daily life and students with special needs are not a category to “deal with”. If we are truly sincere about our pursuit of inclusion of **ALL** students, then we need to start with how we build our community and change our language. **My suggestion** to start?: Before we say SPED, put a face on that term and then use the entire term special education at least. It is always easy to put an acronym on anything; not so easy to understand the repercussions of that choice.

## #2. **WHAT IS INCLUSION?**

This is the **definition** that I would like to see the BOE adapt for our community of islands.

Inclusive **education** means that **ALL** students attend and are welcomed by their neighborhood schools in age-appropriate, regular classes and are supported to learn, contribute and participate in all aspects of the life of the school.

The definition of inclusive practices by the OCISS, I believe limits the ability of our “system” to meet our goals. Inclusive practices are those that

build a community of learners within a school/classroom that encourage the academic and behavioral supports and growth of **ALL** learners. Inclusion is not just about the learning of students with “disabilities”. It is about the entire school. The types of instructional strategies found in **inclusive** classrooms, including peer tutoring, cooperative learning groups, and differentiated instruction, have been shown to be beneficial to all learners. For example, Slavin, Madden, & Leavy (1984) found that math scores for students with and without disabilities increased by nearly half a grade level as a result of working in cooperative learning groups. - See more at: <http://www.wrightslaw.com/info/lre.incls.rsrch.whitbread.htm#sthash.3FFsKN3E.dpuf> The use of graphic organizers, study guides, and computer accommodations resulted in significantly improved performances on tests and quizzes for students with and without disabilities (Horton, Lovitt, & Berglund, 1990).

### **3. HOW TO IMPLEMENT INCLUSIVE PRACTICES**

A. By stating that in Hawai‘i all students have the same expectations for achievement: Common Core standards, the OCISS has limited our potential for the growth of **ALL** students. The standards are NOT a goal for children. We do not want our keiki to be standard. In addition, by specifically listing their success on Common Core they have linked all children to days of test prep work in their classrooms. For our students with special needs, the SBA and all that comes with it does not contribute to their growth as individuals, it more clearly excludes them from what we attest to be our goal of inclusion. The frustration with being made to fit into the “box” identified by Pearson is a daily experience for most of the students and their teachers. While having a specific set of goals for our students is empowering, the current mantra of Common Core and passing the SBA defeat us before we even start. Asking students who are succeeding on work at their individual level to take assessments that only remind them that they can’t do that doesn’t motivate them to do better (they are already doing their best), it just gives them more reason to act out, to retreat into themselves or just give up. From my most recent experience teaching fourth grade, each year no matter what kinds of words we used to tell the children that they had improved and that was most important. The atmosphere of the TEST and watching their score roll up on the screen defeated much of what was accomplished. THIS TESTING CULTURE has to go. PLEASE ask OCISS to rethink their inclusive practices. Rigor is a buzzword and what happens to dead bodies which our keiki are not.

B. Mandating top down resources for all children to use is not conducive to their learning. The teachers working directly with those students and their school communities should be the ones choosing the resources. PEARSON Wonders is a basal textbook, pure and simple. It is not a wonder and has caused more problems than it has solved.

C. Implementation of inclusion is a community effort involving all stakeholders. It is not “another program”. It is life for **ALL**. One of the mistakes that the DOE has made, I believe is treating this like a program and then saying we will “train” the teachers and staff. This means that we are attempting to have them retain a particular skill or type of behavior through practice and instruction over a period of time. What has been missed is that inclusion is strong practice of meeting our students’ needs in the classroom. We need to encourage teachers and schools to understand that inclusion is a part of what they do daily. It is not something new. I think that most educators get that. The hard part is all of the extra paperwork and time in IEP meetings. The other challenge is working in a close team work situation with others. This is about inclusion in its purest sense, these are people skills. Some educators feel uncomfortable sharing their “kids” or room, for example. From my experience, this has often been the downfall of good intent in schools. The “PEOPLE” component is not a “trainable” point, it is more. Often teachers who agree to embark on inclusion are ostracized and bullied by those around them who feel threatened by this idea of having ALL children in the classroom. For me, inclusion with all of its challenges was a joy to me. I got to work daily with amazing children and colleagues. From Ewa, my first experience to Millilani Mauka with my final experience, I have been a part of some great learning adventures. Inclusion as it has been to date is a challenge in so many ways and a quick slideshow of this is what we will do IS DEFINITELY NOT THE ANSWER.

### Closing **THOUGHTS**

I admit that there is a lot to consider and my testimony is a lot to read. I will be at the SAC meeting on Tuesday, presenting an abridged testimony. I once again offer to sit down and share with anyone. I believe strongly in public education and hope that together we can do what is right for our keiki. As I often ask, how do you answer this question: pehea na keiki?

Addition

This is off topic but I believe that it is important that the DOE and BOE are role models for the community. Therefore, I humbly request that the proper use of the spelling of Hawai'i be used on documents.

Mahalo,

Cheryl Burghardt

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**April 5, 2016**

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Ms. Martha Guinan, *Chair*

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to the military*

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Ms. Jasmine Williams

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Amanda Kaahanui, Staff

Susan Rocco, Staff

Patricia Halagao, Chair

Student Achievement Committee

Hawaii State Board of Education

P. O. Box 2360

Honolulu, HI 96804

RE: IV. D. Presentation by the University of Hawaii College of  
Education, Special Education Department on special education  
inclusion nationwide and statewide, and  
IV. E. Presentation on special education inclusion in the  
Department of Education

Dear Chair Halagao and Members of the Committee,

The Special Education Advisory Council (SEAC) welcomes the  
opportunity to provide suggestions and recommendations to the  
Committee regarding providing a definition of inclusion, expanding  
the discussion to cover early childhood inclusion and adding inclusive  
elements/practices to the Board's proposed policy on inclusion  
(105.13).

SEAC is committed to effective inclusive practices in all Hawaii  
schools to enable students with disabilities to benefit from high quality  
instruction with appropriate supports and services that prepares  
them for successful lives in the community. The Individuals with  
Disabilities Education Act (IDEA) is very clear in its requirements that,  
to the maximum extent appropriate, students with disabilities, including  
students in public or private institutions or other care facilities, be  
educated with students who are not disabled. §612(a)(5).

In the spirit of partnership to improve services for Hawaii's students  
with disabilities, SEAC offers the following recommendations based on  
our experience and expertise:

**1. Provide the field with a definition of inclusion/inclusive  
education.**

SEAC has observed that for a number of years there is considerable

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confusion in schools and classrooms over what is meant by the term inclusion, as it is not defined in IDEA or Chapter 60. Having a common definition would help to clarify the direction of the Board and the Department. SEAC favors the definition by Richard Villa and Jaqueline Thousand included in Dr. Sheehey's presentation: *[Inclusion is] "the commitment to educate each student, to the maximum extent appropriate, in the school and classroom he or she would otherwise attend. Inclusion brings the support services to the student (rather than moving the student to the services) and requires only that the student with a disability benefit from being in the class (rather than having to 'keep up' with the other students.)" (2005)*

**2. Expand the focus and discussion to include early childhood inclusion.**

Data from Hawaii's Annual Performance Plan for 2014-15 show that only **28.7%** of children with IEPs aged 3 through 5 are attending a regular early childhood program and receiving the majority of special education and related services in the regular early childhood program. The U.S. Departments of Education and Health and Human Services released a **Federal Policy Statement on Including Children with Disabilities in High-Quality Early Childhood Programs** in September of 2015 (<http://www2.ed.gov/policy/speced/guid/earlylearning/joint-statement-executive-summary.pdf>), in which they state "it is the Departments' position that all young children with disabilities should have access to inclusive high-quality early childhood programs, where they are provided with individualized and appropriate support in meeting high expectations."

**3. Include additional inclusive elements/practices in the Board's proposed policy.**

SEAC appreciates that your draft policy includes a number of elements that help to ensure the successful inclusion of students with disabilities. For greater clarity, we suggest that you consider adding additional inclusive elements, such as the following:

- Early intervening supports and strategies to support students at risk of school failure due to academic or behavioral challenges;
- Authority and resources for IEP teams to discuss the full range of supports (i.e. behavioral supports, class size, accommodations, staff support, etc.) necessary to maintain a student in the least restrictive setting;
- IEP team placement decisions based on student needs rather than on the perceived availability or lack of availability of financial, personnel or other resources;
- Staffing and funding options that support collaboration and the provision of education in the Least Restrict Environment;
- Inclusion of students with disabilities in nonacademic and extracurricular services and activities to the maximum extent appropriate to the needs of the individual student;
- Flexible learning environments, with flexible curricula and instruction;
- Multiple teaching/learning approaches like team teaching, co-teaching, peer partners, cooperative learning, etc.; and
- Support and training to general education teachers and ensuring adequate staffing ratios so that students can be successful.

-- continued



SEAC's experience and expertise on inclusive practices dates back more than 25 years. We provided input on the first inclusion policy developed in 1995, the amendments to that policy in 2006 and the proposed amendments in 2011, which followed an Office of Special Education Programs visitation that posited two factors leading to low numbers of students having access to the regular education classroom--a lack of supports and services available in the regular education classroom and inappropriate placement decisions.

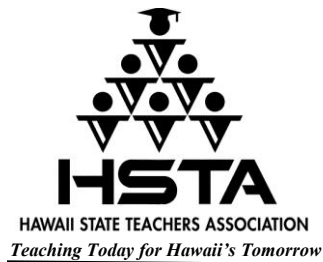
Despite SEAC's constant and collective voice on the need to improve inclusive practices, frustratingly little progress has been made. However, we are hopeful and eager to work with the Board and the Department on planning, implementing and evaluating future efforts to provide greater access to the general education classroom for students with disabilities.

Thank you for this important opportunity to offer input. If you have any questions, please feel free to contact me.

Respectfully,



Martha Guinan  
Chair



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Wilbert Holck  
Executive Director

## TESTIMONY BEFORE THE BOARD OF EDUCATION

RE: SPECIAL EDUCATION SUPPORT SYSTEM AND INCLUSION

TUESDAY, APRIL 5, 2016

COREY ROSENLEE, PRESIDENT  
HAWAII STATE TEACHERS ASSOCIATION

Chair Mitzumoto and Members of the Committee:

Special education instruction meets the unique needs of students with disabilities, including academic, speech-language, psychological, physical and occupational, and counseling accommodations. Governed by the federal Individuals with Disabilities Education Improvement Act of 2004 (IDEA) and state regulations requiring the Hawai'i State Department of Education to provide a free, appropriate public education (FAPE) to eligible students, special education services are made available to any student aged 3 to 22 who demonstrates a need for specially designed instruction.

Despite reform efforts over the past 15 years, special education in Hawai'i requires additional support. On statewide assessments, most of Hawaii's special needs students are performing below grade level in reading and mathematics. In the 2013-2014 academic year, only 22 percent were proficient in reading and 15 percent proficient in math. Moreover, between the 2004-2005 and 2013-2014 academic years, the achievement gap between special education students and their general education peers increased to 48.2 percent in reading and 48.8 percent in math, an approximate change of 10 percent in reading and 27 percent in math.

To boost performance, we must decrease the workload of special education teachers and provide additional funding for special needs classrooms. This can only be

Corey Rosenlee  
President

Justin Hughey  
Vice President

Amy Perruso  
Secretary-Treasurer

Wilbert Holck  
Executive Director

achieved, however, if special needs students are not viewed as homogenous, but instead as existing on a wide spectrum of capabilities and needs. Moreover, in some schools, as many as a third of our students have individual education plans (IEPs). Special education teachers are often overburdened with paperwork, lack adequate time to complete IEP tasks, and have insufficient funds for learning materials and equipment. In a 2015 HSTA survey of special education teachers, more than 70 percent reported that they were not given adequate time to lesson plan or complete IEP reporting during the work day, while 60 percent of SPED teachers said that they did not receive appropriate support from school administrators.

SPED teachers' plight was exacerbated in the 2010-2011 school year, when, due to a loss of federal funding, the DOE discontinued yearly supplemental supply funding of \$1,690 per teacher. As a result, 63 percent of SPED teachers responding to the survey revealed that they had not received any separate SPED allocation from school administrators for supplies or curriculum, and more than 80 percent stated that they had made out-of-pocket purchases to meet specific student needs. Accordingly, we urge policymakers to give special education teachers additional preparation time and seek funds for instructional materials, the latter of which we estimate would cost roughly \$3,750,000 if the \$1,690 supplemental supply funding is reinstated for all SPED teachers systemwide.

Additionally, teachers regularly oversee classes above these suggested Board of Education maximums, sometimes managing rosters with as many as 40 or 50 enrollees and total workloads of over 200 students. While the DOE reports, each year, on teacher-student ratios, these numbers are often skewed by the number of teachers pulled out of the classroom to serve as *de facto* departmental employees or "resource teachers" and do not account for the total number of classes above the department's reported or BOE's suggested ratios. As the number of special needs students or English language learners increases in any class, so does the need for individualized instruction. Accordingly, we view lowering class size as one of the most instrumental and obvious methods of boosting learning growth and improving teachers' work conditions.



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Executive Director

Because special needs children deserve every opportunity to succeed, the Hawai'i State Teachers Association asks the BOE to provide adequate support systems for SPED students and their teachers.

Aloha,

I appreciate the opportunity to discuss the matter of special education placement, inclusive practices and special education staffing methodology.

I have spent over 35 years working for the Department of Education as a special education teacher in the school setting. I have also been an active member of HSTA in various capacities, and as such have been appointed to various committees. Four relevant committees for today's agenda were:

- 1) The HSTA/DOE Special Education Joint Committee instituted by the HSTA Contract
- 2) The Special Education Staffing Methodology Workgroup that developed the staffing methodology. (the chart listed on page 14 of the DOE presentation)
- 3) The Committee on Weights (COW) for three rounds. The initial two rounds, and then a third round about three or four years ago.
- 4) The WestEd Stakeholders Workgroup for a short time

I am a public school teacher, parent, grandparent, and advocate. I want to say I am a strong proponent of inclusive practices, and have been developing programs to support students in general education settings long before the Department of Education supported these practices.

The bottom slide on page four is a key piece that needs more clarification.

- SWD must have access to the General Education Curriculum (this can be done regardless of placement)
- To the maximum extent appropriate, be educated with nondisabled peers; and (the key word being appropriate)
- This is their LRE



I would stipulate guidance on defining what appropriate is, could clarify significantly when a more restrictive placement is appropriate. Currently the guidance we have gotten is to consider the benefit or harm of the placement on the student with the IEP as well as considering the benefit or harm of the placement on the other students and their learning. If the IEP team had to go through a placement checklist and address why the students needs could not be met in as LRE this might help, however unless or until we address the expectations and teaching conditions within the general education classroom, teams will often come to the conclusion a smaller class setting with individualized curricular expectations to the generalized curriculum, at least in theory, provides more benefit to the SWD than a general education classroom with or without additional adult support.

Another issue I have been struggling with for many years is the criteria for identifying students as having disabilities, especially the SLD criteria. In the initial criteria it no longer makes a comparison to ability, so many low average potential students are identified as SWD. We recognized IQ with students below 70 however we pretend there is no students with IQ's 70 and 85, and too often these are the very student who benefit the most from being in general education settings.

I admit a bias to the SPED Staffing Methodology document, represented by a chart on page 14, as it was an attempt to be student needs driven. There is much more than this chart to the document. It was also intended to provide information to determine funding needs to the legislature. Having worked on the initial document, we still tried to fit it into the class size formula for general education using a divisor or 26/1. The group did not consider it a finished product, and clearly needed improvements. It certainly needed to be reviewed and revised as inclusion was being implemented and encouraged.

When the legislature passed the Omnibus Bill on Education to move to a Weighted Student Formula (WSF), a Committee on Weights (COW) was set up to determine the various weights for the various populations of students. The weights were to be based on student needs. Special Education students needs were discussed, however



because we already had a needs driven formula in the SPED Weighted Staffing Methodology. To my knowledge, subsequent COWs did not ever go back to revisit this issue, only discussing if the sped funds should be in the pot or left as categorical.

Despite requests by HSTA to the DOE through the special education committee to revise the Weighted Staffing Methodology, it was not done. The Special Education Committee barely met over several years. Special Education issues were being addressed through top down directives, rarely through collaboration.

The DOE moved unilaterally to a Proportional Methodology. I see several problems with the Proportional Methodology.

- 1) It has no relationship to student needs.
- 2) It generates no data to provide the legislature for funding special education needs
- 3) If the funding is cut in half or reduced by 90% the formula still works, we have no way of gathering evidence of funding needs. This could also work in the opposite. Without a mechanism for gathering funding needs requests could increase without justification.
- 4) The Proportional Methodology only goes to the district with some level of equitability. However there is no guarantee schools will get their funding adequately. When I was on the Staffing Methodology Committee I was insistent the money flowed directly from the state to the school as I had been involved in a situation where our DES and District Superintendent cut five positions at our school as punishment for not doing what we were told. (By the way, what we refused to do was put most of the sped students into special education classes, we were in fact including them). We eventually got the positions back as we grieved and it was a clear abuse of power. This was just prior to Felix. I know this is ancient history, however the potential for abuse of power still exists.
- 5) West Ed was contracted after the Proportional Methodology was put into place. I sat on the work group for a few meetings, then they stopped meeting and completed their report without full representation. They had predetermined that the Weighted Methodology was the problem before the first meeting.

of CAS's. No effort was made to work with the Weighted Staffing Methodology to address any deficits. Maybe the BOE could ask the DOE who made this decision.

9. Since we are still not adequately addressing LRE it is questionable if the Proportional Methodology is truly compliant with IDEA.

I suggest a new group be put together that tries to address student needs.

I look forward to any questions you may have and am willing to share further information as you

Sincerely,  
Karolyn Mossman  
Special Education Teacher  
Kalama Intermediate