

A Response to the BPS Inclusion Plan

Massachusetts Advocates for Children

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EXECUTIVE SUMMARY

This response by Massachusetts Advocates for Children is an analysis of the plan submitted by the BPS administration to the School Committee on June 19, 2013 – “Increasing Inclusive Practices in the Boston Public Schools,” hereafter referenced as the Inclusion Plan. Our analysis only responds to the written Plan, but from discussions with stakeholders in and out of the department, it appears that there is a genuine interest and commitment among school principals and central office administrators to increase inclusive practices according to this Plan. That momentum is critically important to nourish and sustain over the course of time it will take to implement this Plan.

Many elements of the plan are well-conceived and reflect a deep understand of inclusion policy and practice. There is much to build upon. These are the major points in our analysis that form the basis of this MAC response:

- While it is very important to provide more inclusion opportunities for students with disabilities, as required by law, it is more important to do it right, so that students are helped, rather than inadvertently harmed.
- For starters, it is critical that BPS learn from history and not underestimate how difficult it will be to effectively implement inclusion.
- To be successful, this Plan will require a major overhaul of general education, so that the very classrooms that could not sufficiently educate students or manage their behavior will now be transformed so as to accept them back.
- The Plan represents major systems change and a paradigm shift in teaching practice and school culture that will require extraordinary oversight and monitoring to make sure it is done well- this Plan does not provide that assurance.
- The Plan relies on the effective implementation of existing initiatives to serve as building blocks for inclusion. But have there been evaluations conducted of these initiatives, such as the Academic Achievement Framework (AAF), PBIS, etc.? For example, for schools where AAF is being implemented, have they effectively secured and deployed resources needed for Tier 2 and Tier 3 interventions? Have they assured that referrals to special education for students not helped by Tier 3 interventions are not delayed?
- The Plan touts the current level of inclusion activity as manifest in an Inclusive Network that is composed of 32 schools. But have any of them been evaluated? Just saying that one is doing inclusion doesn't make it so.
- There is currently confusion over two different “types” of inclusion, which this Plan does nothing to resolve. Thousands of students with disabilities already spend most of their school day in regular education classrooms that are categorized as “inclusion” but that do not conform to any of the effective inclusive practices outlined in the Plan. A student can be placed in an “inclusive” classroom or can be included in a “regular” classroom. According to state classification, both are considered to be inclusion placements. And yet the experience of the two students will be radically different.
- Most important, the accountability system as outlined in the Plan is flawed and disconnected from the rest of the Plan, as it only measures the movement of students from substantially separate

classrooms into general education classrooms. The danger is that special education personnel will feel pressured to change placements of students without the necessary supports, which would be extremely detrimental to them, to the classrooms and to the school. The accountability system as currently constituted doesn't tell policy makers what they want to know- whether inclusion is being implemented successfully according to the criteria in the Plan.

- To guard against students being prematurely returned into the general education classroom, there needs to be: a) an internal/external group to “certify” inclusive classrooms; and b) a system to provide safeguards at the IEP Team level for any change in placement to assure that the services will follow the student and that there is an appropriate placement for the student.
- Instead of only measuring placement data, the metrics of this Plan should be to create numerical goals for increasing inclusive schools and classrooms, school by school, that meet predetermined criteria for success. Then, and only then, should the movement of students to those classes be tracked. “If you build it, they will come...”
- Those criteria must include meaningful participation in meals, recess, clubs, and extracurricular activities that is just as critical as the quality of inclusive classrooms. Therefore, the emphasis should be on evaluating the quality of inclusion in the school as a whole which will also encompass the effectiveness of classrooms as well as student performance and participation.
- As the Plan suggests, inclusion will be most successful when it is planned and implemented on a school by school basis. Effective whole school change involves creating a learning community. In the context of common standards and criteria across the system, each school should develop its own action plan and accountability measures. The district and the schools should work together in a respectful partnership, befitting the very virtues of inclusion.
- Principals/headmasters to be hired and the new superintendent to be appointed must be committed to and experienced in the implementation of effective inclusive practices throughout the school system.
- The growth of autonomous schools (e.g., in-district charters, innovation, pilot schools) within BPS puts them on a potential collision course with this Plan. It is essential to require that the mission and culture of future autonomous schools within BPS are welcoming to students with disabilities and are consistent with the effective inclusive practices.
- A cost analysis must be conducted of the Inclusion Plan as it gets implemented school by school, but don't assume it will save money, short-term or long-term.
- The implementation of inclusion should be aligned with other whole school change initiatives that various schools will be undertaking.

While the School Committee is not obliged to approve the Inclusion Plan, we believe it is important the Plan be the source document that guides the work of the department and serves as a reference for any oversight group empowered by the School Committee. When implementation demands that plans change, it should be done so through regular revisions of this Plan. We therefore call upon BPS to revise this Inclusion Plan taking into account feedback such as the type provided in this response and seeking the input of other stakeholders and experts.

INTRODUCTION

For years, MAC and other advocates, parents, educators and other professionals, and BPS officials themselves have called for greater inclusion, appalled that so many students with disabilities were being placed unnecessarily in segregated settings, and that so few were included with their typically developing peers in the general education classroom.

The BPS Inclusion Plan, "Increasing Inclusive Practices in the Boston Public Schools," was unveiled at the June 19, 2013 School Committee meeting. It is the product of a process that involved input from internal and external experts, individuals steeped in their knowledge of special education and experienced with inclusion. Not surprisingly, the plan is thoughtful and says many of the right things about both the end product and the process of increasing inclusion placements in BPS.

Even if the Plan were perfect or nearly so, we would have concerns about the ability of BPS to implement such a monumental organizational culture change with so many moving parts. We would exhort the School Committee to closely monitor such a complex implementation, to assure that it was done effectively, within the law, and without harm to any students who often are at risk when sweeping changes of any type are instituted.

But this MAC analysis contends that the Plan itself contains serious flaws that appear to underappreciate the magnitude of this challenge and that include a deficient, and potentially dangerous, accountability system that is disconnected from the Plan itself. It also lacks coherence and confusion about what inclusion is. For while inclusion done well promises so much, inclusion done poorly can be disastrous- for the children, for the classrooms and for the schools.

This analysis of the Plan by MAC is designed to assist BPS decision makers to ask the right questions and shape a critique so that the Plan could become worthy of the change it is promising. At this time, we recommend that the School Committee seek revisions and improvements in the Plan based on feedback not only from this Report but also from other stakeholders and those knowledgeable about the implementation of inclusive practices in a large urban school system.

1. LEARN FROM HISTORY AND DON'T UNDERESTIMATE HOW DIFFICULT THIS CHANGE WILL BE

"This is an astounding and unacceptable trend." [Referring to the 47% of BPS special education students in separate settings, twice the national average.]

*From the 1998 BPS Special Education Report*¹

During the course of the *Allen v. McDonough* class action law suit (1976-1998)² to assure compliance by the Boston Public Schools with the state special education law (Chapter 766), greater inclusion emerged as an important goal and method of improving educational opportunity for students with disabilities.

¹ Payzant, Thomas, Superintendent, "BPS Accountability Standard for 'Least Restrictive Environment' Mandate" to the Boston School Committee, November 23, 1998.

² For purposes of full disclosure, Massachusetts Advocates for Children filed the lawsuit in 1976 and continued to represent the plaintiffs through the course of the court orders.

Detailed plans for greater inclusion opportunities for BPS students with disabilities were included in an Arthur D. Little 1992 report.³ Inclusion, or mainstreaming, was a key component of the 1993 plan submitted by the department⁴ and then of the 1993 Master Plan for Training as part of the Superintendent's revised implementation plan.⁵ In the department's philosophical shift to school-based management in the late 1980s, three visionary principals established different inclusive school models at the O'Hearn (now Henderson) Elementary School, the Mary Lyon School and the Mason Elementary School.⁶ In 1996, an extensive evaluation of special education inclusion underway in eight (8) schools in BPS was conducted by a UMass Amherst School of Education research team that examined both promising practices and also internal bureaucratic barriers.⁷

After the court case ended in 1998, the department's plan centered around shifting the high number of students in segregated settings to the general education classroom. Elements of that plan echo in today's 2013 Plan: too many students are being referred initially into substantially separate placements; general education, particularly literacy and behavior initiatives, needs to be improved so that students with disabilities could be included in the regular classroom (or not referred to special education in the first place); special education must be aligned with the BPS Citywide Learning Standards; extensive professional development should be instituted for both special and general education teachers; the special education department must link better with other BPS departments; and a data-driven plan must be instituted with standards and benchmarks.⁸

It is fair to say that the 1998 plan did not succeed. Millions of dollars were spent on general education literacy programs, and training programs for improved student behavior were instituted throughout the system. Yet six years later, an internal BPS report stated that special education was lagging behind general education in most schools in "understanding and implementing standards-based reforms," that special education students were not being taught from the same curriculum as general education students, that principals and teachers lacked training in providing accommodations, and so on.⁹ And the "astounding and unacceptable" rate of students in segregated placements was largely unchanged in 2004 and still is.

³ Described in Office of the General Counsel, Boston Public Schools, "Allen v. McDonough Working Files," in the Allen Case History section.

⁴ Editorial, "Special Winners," Boston Globe, May 6, 1993; Mangan, Patricia, "School board to mull overhaul of special ed.," Boston Herald, April 23, 1993.

⁵ "Master Plan for Training: Superintendent's Revised Implementation Plan," Boston Public Schools, November 29, 1993.

⁶ Sataline, Suzanne, "A matter of principal," Boston Globe, January 30, 2005; Research and Evaluation Group, UMass Donohue Institute, "Promising Practices at the Mary Lyon School in Boston," *Report of Field Research Findings*, pp. 86-91; Harvard Graduate School of Education, Programs in Professional Education, "The Samuel W. Mason Elementary School: An interview with Mary Russo," 1999.

⁷ Rossman, Gretchen B. et al, "A Formative Evaluation of the Boston Public Schools' Special Education Initiative on Inclusion," University of Massachusetts at Amherst School of Education, 1996.

⁸ Payzant, op. cit.

⁹ Superintendent's Leadership Team Sub-group, "The Special Education Achievement Gap in the Boston Public Schools," Boston Public Schools, April 2004.

A 2006 study of BPS special education conducted by the Boston Plan for Excellence¹⁰ highlighted the high rate of students with disabilities in segregated settings, especially as they were disproportionately represented by black males. It did not come as a surprise, then, that the 2009 report of the Council of the Great City Schools¹¹ should hone in on the need to reduce substantially separate and increase inclusive placements, echoing many of the analyses and recommendations made in the past.

But this 2013 Inclusion Plan doesn't acknowledge past plans or failures. It is understandable that the Plan reflects a newfound energy and momentum within the department to increase inclusion among the schools. But it only makes one reference to the past, referring to changes it recommends in the IEP process: IEP team members need to shift their "existing and longstanding mindset... that substantially separate is the first and only consideration." Especially for initial referrals, "this will be a major shift from past practice." (p. 15)¹²

It behooves this planning effort to ask the question, "why?" so as to gain an understanding of the circumstances under which past reform efforts failed, all the while taking care not to get stuck in the past. Otherwise, this plan risks succumbing to the well-worn admonition that, "those who fail to learn from history are doomed to repeat it." This Plan must develop a well-conceived change strategy with a compelling logic model that is rooted in a realistic force field analysis, starting with a solid analysis of the forces that resist change. For systems change is hard. Attitude change is hard. Whole school change is hard.

Yet at times, the Plan makes it sound easy. It proudly states that there are 32 schools currently in the Inclusive Network. But has any evaluation been conducted of these schools, based on the very standards and pre-conditions described in the Plan? Or does simply saying make it so?

It is also extremely disheartening that the chief challenge to successful implementation identified in this Plan is the physical impediment of renovating facilities. That challenge takes up three pages of the report and leaves a half page for "other challenges," of which there are only three listed: the need for knowledgeable and committed principals, sufficient staff with the right certifications, and a good internal and external communication plan. That these three challenges barely scratch the surface is cause of concern that the department either does not appreciate or is reluctant to convey the magnitude of difficulty in changing 20+ years of dysfunctional policy and practice around segregating students with disabilities in BPS.

¹⁰ Guiney, Ellen et al., Boston Plan for Excellence, "Escaping from Old Ideas: Educating Students with Disabilities in the Boston Public Schools," A Decade of Boston School Reform: Reflections and Aspirations, The Rennie Center publication and conference, June 19-20, 2006.

¹¹ Strategic Support Team, "Improving Special Education in the Boston Public Schools," the Council of Great City Schools, Spring 2009.

¹² Hereafter, all quotes or references from the Inclusion Plan will be cited in the text by the page number

2. CULTURE: WELCOMING IS MORE THAN TOLERATING

The Plan is absolutely right that a welcoming school climate is integral to inclusion – it is listed as both one of the eight pillars and one of the seven pre-conditions. And the Plan states clearly the essential attribute of a welcoming and supportive school climate: “Teachers and staff must be flexible in their practices and in their approach, and frequently adapt to students’ needs” (p. 10). This attribute is essential to implement the eight effective inclusive practices (p. 13), especially flexible pacing, multi-sensory teaching, accommodations, modified instruction, and reduction in volume and pace for homework and classwork, when necessary.

But for many schools, institutionalizing this mindset will require a pedagogical and/or school mission paradigm shift. At the very least, it will require significant professional development for general education teachers to change their approach to teaching, especially in the higher grades where teachers are content area specialists first. The traditional pedagogical approach is that students must adapt to the style and methods of each teacher. This inclusion methodology turns that on its head.

Compounding the challenge of changing individual teachers’ styles is the task to transform school cultures that demand students “fit in” in order to be successful. In particular, many of the autonomous and semi-autonomous schools – innovation, in-district charters, pilots and even exam schools – are not cultures that are hospitable to different learning styles and to the inclusion philosophy.¹³ They will “tolerate” students with disabilities as long as they are able to adapt to the rigors and standards of their particular classroom and school culture. These schools work well for many students, but they are not exemplars of a welcoming and inclusive culture, unless that is integral to their very mission, such as the Mary Lyon Pilot High School and the Young Achievers Pilot School. It is concerning that the growth of autonomous schools within BPS places them on a collision course with this Plan to expand inclusion schools system-wide. The testimony of the Countdown to High School teachers at the June 19 School Committee meeting revealed the “exclusive” nature of some of these autonomous schools and how little they are welcoming to students with disabilities.¹⁴

3. IT STARTS WITH LEADERSHIP

The Plan is absolutely correct to place committed leadership first among the eight pillars and the seven pre-conditions. “School leaders must embrace and value inclusive practices. ... Since expanding inclusive practices can be challenging, school leaders must possess strong leadership skills, drive and passion.” (p. 10) So it stands to reason that the first benchmark for successful implementation of the Plan should be whether commitment to and experience with inclusion will be a hiring criterion for principal/headmaster positions to be filled, as well as for the new superintendent.

The most recent headmaster job description currently on the BPS website (posted July 3, 2013), for the Brighton High School position, makes no mention of inclusion or the whole school change effort

¹³ That is particularly true for those schools that embrace the “no excuses” philosophy popularized by an influential subset of independent charter schools.

¹⁴ To learn more about this organization, see www.cd2hs.org

required to increase inclusive practices. There is only mention within the set of responsibilities that successful candidates, “ensure that the learning needs of special education, ELL and regular education students are met.”¹⁵ There is nothing in the set of required qualifications related to the expectations that the implementation of this Plan will place upon the new Brighton High School headmaster.

It is critical that future job descriptions and hiring processes elevate inclusion to a pre-requisite for all headmaster/principal positions within BPS. The same must be true for the hiring of the new superintendent. And all BPS principals / headmasters, and the new superintendent, should be evaluated on their effectiveness in promoting quality inclusive opportunities in their schools.

4. SCHOOL BY SCHOOL

In part because each school’s culture is unique, the Plan makes clear that inclusion will look different from school to school. While the Plan is right to identify and mandate common elements, it can only work if implemented on a school by school basis. The best way for schools to go through the whole school change process to become more inclusive is to do so as a learning community, recognizing that implementing inclusion is a long-term on-going process of continual improvement. Each school should develop its own action plan within the context of guidance from the central office as to the common elements required of all plans. It will be incumbent on BPS to develop a set of benchmarks and indicators so that success can be evaluated for each school, but also allow schools to develop their own accountability measures consistent with their own plan. As the school is the source of invention, it also must be of locus of intervention, if needed, to assure the success of the entire change effort.

5. INCLUSIVE CLASSROOMS OR INCLUSIVE SCHOOLS

The Plan rightly points out that, as befits a welcoming school culture and a whole school change model, all staff in the building – including cafeteria and janitorial – should receive training and be on the same page around including students with disabilities in all aspects of school life (p. 10). True inclusion, after all, must include meaningful participation in meals, recess, clubs, and extracurricular activities.

But as the Plan gets implemented over time, it is hard to imagine that a school would only have an island of inclusion for a subset of students, as currently exists in some of the schools in the Inclusive Network. As the Plan proposes (pp. 16-17), there should be an intentional movement through the implementation phase that will gradually increase the number of inclusive classrooms in those schools that are starting small so that they eventually become inclusive schools. An inclusive school under this definition could incorporate substantially separate classrooms as is envisioned under the “strand” model where students in the latter setting could have a goal of transitioning to inclusive classes. What makes less sense is having inclusive classrooms continuing to co-exist with “regular” classrooms of different class size, different teacher:student ratios, and different pedagogical approaches.

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https://recruit.cityofboston.gov:8443/psp/prdcg/EMPLOYEE/HRMS/c/HRS_HRAM.HRS_CE.GBL?Page=HRS_CE_HM_PRE&Action=A&SiteId=2

6. RESOURCE ROOM STUDENTS: WHAT IS INCLUSION ANYWAY?

One of the features that makes special education in Boston so complicated and difficult to understand, and therefore to change, is the classification of more than 4,000 students with disabilities as an “R”, for Resource Room. An ‘R’ is a definitional anomaly; it is neither a disability nor is it on the placement continuum, both data sets that get reported to DESE on an annual basis. But because these students just have an R designation, Boston’s internal data only provide disability information for just over 60% of students enrolled in special education. And then there are a smaller number of about 200-300 who are classified as ‘I’ for inclusion.

To complicate matters further, the 4,000+ ‘R’s do not get placed by the IEP team as required by law- they just go through the regular school assignment process. But the ‘I’s do get placed by the IEP Team.

So what is inclusion anyway? Based strictly on the federal and state numerical definition of the percentage of time spent in the regular classroom, many of the 4,000+ ‘R’s are in partial inclusion and many are in full inclusion settings, depending upon how much time they are assigned in their IEPs to the resource room.¹⁶ So there are currently thousands of students with disabilities in some type of inclusive setting in schools throughout BPS, most of which are not part of the Inclusive Network, and in classrooms throughout BPS, most of which don’t conform to the inclusive practices outlined in the Plan.¹⁷

If progress toward inclusion under this Plan is simply a matter of moving students currently in substantially separate classrooms to full or partial inclusion, then the numerical goals of “inclusion” can be achieved without implementing a single reform contemplated by the Plan. Obviously that is not the intent of this Plan, but without a coherent definition of inclusion, that can be the result. In the special education vernacular, that is known as “dumping,” or mainstreaming students from substantially separate classroom into the general education classroom without providing them with the supports they require.

Definitional and programmatic clarity is essential in order to successfully implement this massive system change. Here is just one example of where clarity is needed. In the Rogers Middle School (leaving aside the move of the new Haley School expansion), each grade has two inclusive “integrated” classrooms that conform to many of the Plan’s effective inclusive practices, even more regular middle school classrooms that do not conform to the inclusive practices and that are populated by a significant proportion of ‘R’s, and finally a number of substantially separate classrooms. According to the state classification system, not only are the 15-20 students with disabilities per grade in the integrated classrooms considered to be learning in inclusive settings but so are all the other resource room students in the general education classrooms. And yet according to this Plan, the Rogers will need to

¹⁶ A resource room is simply a location where services are delivered. They are also known as “pull-out” services, but students in full inclusion settings can also be “pulled out” of class to meet with the counselor or a social skills group where there is no resource room, per se. Some schools are attempting to deliver the same services on a “push in” basis right in the classroom.

¹⁷ This is not to suggest that only the students coded as ‘R’s or ‘I’s are placed in full or partial inclusion settings. A good number of students coded by their disability are also not in substantially separate settings.

build more “inclusive” classrooms that meet the effective practices so that students in the segregated classrooms will be able to move there if their IEP team approves that change in placement. But what about all the students classified as ‘R’s? Invariably, some of them will eventually be referred to a substantially separate classroom because they are not progressing educationally in the general classroom which does not offer the effective inclusive practices. Yet moving them into a newly created “inclusive” classroom will not move the needle on the disproportionality of students in segregated settings and thus not be consistent with the metrics of this Plan.

As for confusion surrounding inclusion and the school assignment process, the Plan notes that the IEP Team places each and every student into inclusive or any other setting (p. 15). Does that mean that BPS will now change the practice of allowing the parents of students classified as ‘R’s to choose their school on their own through the school assignment process? If so, what are the attendant resource costs?

7. BOTTLENECK IN THE K-12 PATHWAY

It will all be for naught if increasing numbers of students with disabilities thrive in inclusive settings in their K-8 schools and then are stymied with few options to build upon their educational experience once they go to high school. While the Plan talks about the need to build out the pathway over time and add inclusive settings at the high school level, there is no analysis about why that has been so difficult in the past and what will need to be done to enable it in the future. A greater proportion of student placements are substantially separate in high school than in the younger grades. Why?

The Plan must provide much more detail about increasing inclusive opportunities at the high school level. It will not serve as an effective or credible road map if it can only move the system with confidence two-thirds of the way to its K-12 destination. There are seven, soon to be eight, high schools in the Inclusive Network. But are they all equally inclusive? Are they at different stages of development? These high schools need to be assessed regularly against the standards established in the Plan to provide some confidence that they will become models that can eventually clear the bottleneck and assure a true K-12 inclusive pathway for Boston children and their families.

8. CAN GENERAL EDUCATION BE TRANSFORMED?

The ill-fated 1998 plan got one thing right- “Special education reform can only occur within the context of general education reform.”¹⁸ For the fact is that teachers, who make most of the special education referrals, do so because they don’t feel they have the resources or expertise to help a child who is failing academically because of a disability or to effectively manage a child who is disrupting the class on a regular basis.¹⁹ The onus, then, on any systems change designed to increase inclusion is to provide the general education teacher and classroom with the resources and expertise so that either they don’t have to make a referral in the first place or they are prepared to accept back into the classroom students of the type they previously couldn’t educate or handle.

¹⁸ Payzant, op. cit.

¹⁹ Guiney, op. cit.

This current Plan assumes that the current general education strategies in literacy, PBIS and AAF (Academic Achievement Framework)²⁰ are sufficient, as it is merely incumbent upon the schools to “faithfully implement” those three strategies (p. 9) to not only increase inclusion but also reduce special education referrals. It would be helpful for the department to document this claim to demonstrate to policymakers and the public how these general education strategies are benefitting BPS students. For example, has there been any evaluation conducted of the efficacy of the literacy initiatives, PBIS or AAF as currently implemented in BPS? Are students who have been identified in the second or third AAF tier been provided with the resources needed to help them to learn or behave short of a special education referral so that they can stay in the regular classroom?

The Plan recognizes the challenge schools face in educating students with behavioral difficulties: “Schools find that serving emotional and behavioral disabilities requires intense concentration, partnerships, and specific skill sets throughout the school. For example, one school leader responded that it would be difficult to implement inclusive practices with students with emotional disabilities, while another principal said that ‘it is doable with ... the right culture and supports.’” (pp. 12-13)

It is critically important that schools which have demonstrated the capacity to include students with emotional disabilities and/or behavioral challenges be used as models for lessons on how to establish a functioning and successful general education classroom. Further, the various behavioral interventions currently implemented throughout the system – PBIS, Open Circle, Second Step, FBA/BIP – must be rigorously evaluated, as well as the behavioral component of the AAF, in order to assure that the general education “inclusive” classroom will be prepared to take back students they previously couldn’t handle. Finally, it will be critically important to assure that these returning students are provided with all the supports they need- counseling, social skills, mentoring, behavior plans – and will be taught by dedicated and competent dual-certified teachers.

Beyond the question of how seriously the Plan takes the challenge of bringing back into the general education classroom students with behavioral challenges, the Plan sends mixed messages on the extent and depth of pedagogical change that will be required to increase the number of inclusive classrooms and schools in Boston. On the one hand, significant changes in teaching practice make up the heart of the list of “effective inclusion practices”: differentiating instruction based on students’ varying knowledge, readiness, language, learning styles and interests; flexible pacing to reflect variance in students’ working memory and processing speed; modifying instruction or content when necessary; using multi-sensory teaching to explain content; implementing accommodations; reducing volume and pace for classwork and homework, when necessary; and using technology in providing differentiated instruction. (p. 8) For teachers to embrace and master these teaching practices on a massive scale will be downright revolutionary, involving intensive professional development and deep culture change.

But as strongly as the Plan embraces change, it appears to back away just three pages later- “Highly effective practices for teaching students without disabilities are also typically highly effective practices for students with mild to moderate disabilities as well. As such, inclusive classrooms should embrace

²⁰ This is what BPS calls its “response to intervention” (RtI) program.

many similar teaching practices for all students in the room or school.” (p.11) Which is it? Unfortunately, the professional development plan for teachers (p. 24) does not appear to offer teachers the type of skills training necessary to manage a transition to an inclusive classroom or to master the effective inclusion practices previously listed. Mixed messages around the core of the pedagogical transformation, the challenges of instituting them through whole school change and an insufficient professional development plan will not inspire confidence that the goals of this Inclusion Plan can be achieved.

9. INTER-DEPARTMENTAL COLLABORATION AND ALIGNMENT

The Plan touts the importance of interdependencies within BPS but could go further. Human Resources must align the job descriptions for principals with the central responsibility for leading the transformation of their schools to become more inclusive. There were 20 or so principal openings as of this past spring. Did the ensuing hiring process choose candidates for their commitment to and expertise in inclusive practices?

As this Inclusion Plan will stand on the ability of the department to improve quality in all schools, it should be strongly integrated into the work of the Quality Task Force that was established pursuant to the recent school assignment process. These inclusive practices should also be integrated into the whole school changes that Madison Park High School will be undergoing to become a high-quality vocational technical school.

The principles underlying inclusion are closely aligned with the newly approved Code of Conduct and trauma-sensitive schools. As principals and others will be undergoing training and professional development in all three, it would make sense to consider the potential overlaps and synergies in linking practices related to inclusion, school discipline alternatives to school exclusion, and creating trauma-sensitive schools. Implementation of all three involve deep culture change. The mechanism that links them together is the framework that is in the Comprehensive Behavioral Health Model, referenced in the recently approved Health and Wellness Policy. The same framework is described in the new Code of Conduct and also is the organizational basis for creating trauma-sensitive schools. This framework organizes the complexities of school infrastructure into six discrete but interrelated operations: (1) leadership, (2) professional development, (3) access to resources and services, (4) academic and nonacademic strategies, (5) policies, procedures and protocols, and (6) collaboration with families. These six operational areas are already embedded in the Inclusion Plan, some quite explicitly, such as leadership, professional development and academic strategies.

10. IT WON'T SAVE MONEY

The Plan suggests a savings at some point in the future of \$3 million per year (p. 27). This is a dangerous notion to link to this effort. The special education system in general is under-resourced. A prime example is how the integrity of current inclusive classrooms (e.g., ratio of special education to general education seats) is threatened by the high demand for inclusive seats. Of course, this Plan is the very solution to that problem: build more inclusive classrooms to take the pressure off the few existing ones, but it comes at a price.

Creating inclusive classrooms will be more expensive, as the Plan itself suggests: “the vast majority of new classrooms will have a dual certified teacher, ... one paraprofessional and a reduced class size.” (p. 11) To do inclusion right means that the services will still need to follow the student, whatever the placement, and the revenue-neutral model of converting a school with some general education and some substantially separate classrooms into all inclusive ones²¹ will not necessarily apply to the model suggested in the Plan of schools that create more inclusive classrooms but keep their substantially separate classrooms. A detailed cost analysis and on-going tracking mechanism will be critical to accompany the facilities plan so that the School Committee and Superintendent can have that critical planning tool in hand when it implements inclusion through the school system.

11. MOST IMPORTANT, CHANGE THE METRICS

Perhaps it stems from the School Committee’s charge to create in this Plan, “accountability systems to monitor the percentage of students recommended for inclusive settings. (p. 4)” As it stands, the accountability systems described in the Plan (pp. 29-30) only measure two indicators: the number of current special education students who move from substantially-separate classrooms and the number of new special education referrals that are made to inclusive classrooms rather than substantially separate classrooms. Combined, these two indicators would measure the best-case scenario of the Plan that would reduce the number of students in substantially separate classrooms by half during the next five years, representing a shift of 2,500 students (p. 21).

This measurement methodology is fraught with peril. If the only indicator for success is to be the number of substantially separate students moved into inclusive settings, the Plan will put enormous pressure on school personnel to do just that, even if the classrooms and resources are not available. This is the very real fear of “dumping” that happens too often in school systems around the country under the guise of increasing inclusion to adhere to the “least restrictive environment” provision of the federal special education law.

Even though the Plan says the right things, “change in placement required through the IEP process, only when appropriate for the individual student,” (p.3) these words on paper will long be forgotten under the pressure to meet numerical goals. Putting all “liability” for the success or failure of the Inclusion Plan on the special education coordinators who manage the Team meetings means that, from this accountability perspective, central administration and building leaders, extolled by the Plan for the primacy of their respective roles, bear no responsibility. Similarly, facilities planning, professional development, leadership, culture change, and increasing inclusive classrooms really don’t matter, for they will not be measured. But in fact, this very complex change process has a chain of multiple benchmarks, process and intermediate objectives. Every step along the way, not the last one or two, must be monitored, otherwise there will be no real accountability, and what may have been a promising and exciting transformative moment for BPS could fail under the weight of bureaucratic finger-pointing and disarray.

²¹ As described in the case study of the Mason School. Harvard Graduate School of Education, op. cit.

The short-sighted nature of the accountability system is underscored by the complexity and confusion over the different types of inclusion for resource room students described in section 6 above. *The disconnect between the accountability system and the Plan itself is such that numerical targets could be met without making a single change or creating a single new inclusive classroom.* Today, IEP Teams could change the placement of students in substantially separate classrooms to partial or full inclusion. While architects of this plan would no doubt protest that is not the intent of the Plan, the accountability system does not measure whether one new “inclusive” seat has been created, let alone whether a change in placement has resulted in a successful educational outcome.

This accountability system which only measures the movement of students away from substantially separate classrooms, either at the initial referral or in subsequent changes in placement, also does not take into account the reality that the students who may equally need new inclusive classrooms are those resource room students currently in full or partial inclusion placements who are struggling and on the verge of being sent to a substantially separate classroom. The system must empower and not second-guess the teachers and educators on the ground for determining who is most needy and ready to be placed in an expanded inclusive seat.

If the Plan’s current metric is wrong, what should be used instead? Consistent with the logic of this Plan, the only metric that makes sense is to project numerical targets for the number of inclusive schools and classrooms that will be created. This metric alone demands a shared responsibility and accountability of all BPS stakeholders, so they, from the superintendent on down, will have “skin in the game.” And the good news is that by increasing and creating effective inclusive settings, the desired numerical transfer of students will ensue. “If you build it, they will come.”

But even that one metric is not sufficient. The Plan needs to describe how BPS will determine whether the inclusive classroom(s) or school is successful. It needs to create a set of measures, taken from the Plan itself (e.g., successful adoption of effective inclusion practices, classroom by classroom). It needs to create a committee composed of internal and external experts that will be responsible for the monitoring. But it needs to do so in a way that is a partnership with the schools, that doesn’t squelch the creativity and innovation that each school community should be empowered to develop in the process of putting together their own action plan and accountability measures (e.g., how each school measures culture change, family engagement). For in the end, inclusion is about relationships and respect within the context of a welcoming community. That same spirit of inclusion should permeate the relationship between the department with its oversight responsibilities and the schools where the magic of children with disabilities learning and thriving alongside their peers resides.

RECOMMENDATIONS

1. Create numerical goals for increasing inclusive classrooms, school by school, and recognize that they may be populated by students who are in resource room classification as well as in substantially separate placements, whichever students are ready and need the support of the inclusive classroom, as determined by the IEP team.

1a. Prior to placing students, certify each inclusive classroom by implementing a “stress test”, similar to what is done with the banks, to assure that each classroom has the trained teachers, effective inclusive practices, behavior plans, supports from the school administration, and supports for the students in order to welcome back the type of student whose needs could not previously be met in the same type of classroom.

1b. Utilize the inclusive specialists to review every IEP that changes the placement of a student in a substantially separate classroom to a full or partial inclusion classroom to assure that the student has the appropriate supports and services written into the IEP and that the new placement has the capacity to effectively provide those supports and services and otherwise meet the goals of the IEP.

1c. Align the development of inclusive classrooms and schools with the facilities planning, as described in the Plan.

1d. Encourage schools to move beyond creating a limited number of inclusive classrooms to becoming an inclusive school. The criteria for successful inclusion must include meaningful participation in meals, recess, clubs, and extracurricular activities that are just as critical as the quality of inclusive classrooms. Therefore, the emphasis should be on evaluating the quality of inclusion in the school as a whole which will also encompass the effectiveness of classrooms as well as student performance and participation.

1e. Empower schools to become learning communities in the transformation toward greater inclusion and to develop their own action plans and own accountability measures within the context of the common set of standards and criteria.

2. Create a logic model that is rooted in a realistic force field analysis, starting with solid analysis of the forces that resist change. Then develop a set of benchmarks that will inform policymakers on the success of the Plan’s implementation.

3. Appoint a team of internal and external experts responsible for overseeing the assessment process for both 1 and 2 above. The team should report its results to the School Committee annually.

4. Assure that the job descriptions of principals/headmasters and the new superintendent include a commitment to and knowledge of effective inclusive practices for students with disabilities.

5. Include in the evaluation of principals/headmasters and the new superintendent their demonstrated ability to implement greater inclusion.
6. Require that the mission and culture of future autonomous schools within BPS are welcoming to students with disabilities and are consistent with the effective inclusive practices.
7. Eliminate the R and I categories and instead, categorize students with disabilities by the disability type and the placement on their IEPs, consistent with state and federal categories.
8. Clarify the distinction between effective inclusive classrooms and current full and partial inclusion placements to which students classified as Resource Room and others are assigned.
9. Affirm the role of the IEP team in placing all students, including those with resource room classification.
10. Revise the professional development offerings to teachers so the offerings are consistent with the effective inclusive practices.
11. Assess the effectiveness of the implementation of the AAF, school by school, including the effective securing and deployment of resources needed for Tier 2 and Tier 3 interventions. Assure that referrals to special education for students not helped by Tier 3 interventions are not delayed.
12. Assess the efficacy of the various behavior systems (e.g., PBIS).
13. Assure that the revised Inclusion Plan is aligned with all related BPS whole-school change initiatives across departments, including Madison Park, the implementation of the Code of Conduct and the training on creating trauma-sensitive schools.
14. Conduct a cost analysis of the Inclusion Plan as it gets implemented school by school.