



**STATE OF CONNECTICUT**  
**STATE DEPARTMENT OF EDUCATION**



April 29, 2011

Mr. Paul Kadri  
Superintendent of Schools  
Groton Public School District  
1300 Flanders Road  
Mystic, CT 06355-1042

Dear Mr. Kadri:

The Connecticut State Department of Education (CSDE), Bureau of Special Education (BSE) conducted a special education focused monitoring site visit in the Groton Public School District in February of this year. The review focused on the following key performance indicator: *Improve the district's effectiveness of efforts to educate students with an individualized education program (IEP) as demonstrated by procedural compliance with the Individuals with Disabilities Education Improvement Act (IDEA), and students with disabilities' participation and performance on statewide assessments.*

The attached report reflects the BSE's conclusions regarding your district's performance in this area of focus and any additional items identified through this focused monitoring review related to compliance with special education law and regulations.

As part of the Connecticut State Performance Plan (SPP) and General Supervision System, the 2010-11 focused monitoring system ensures:

- a free and appropriate public education (FAPE) in the least restrictive environment (LRE) is both accessible and available to students with a disability;
- a full investigation of the targeted key performance indicator is conducted; and
- if noncompliance is identified, corrective actions are implemented, evidence-based technical assistance is recommended, deficiencies are addressed and noncompliance is verified for correction within 12 months.

Additionally, part of the CSDE's responsibility is to provide general supervision of school districts' compliance with all state and federal special education regulations. When a review generates findings of systemic practice or a single serious incident that indicates the failure of the district to comply with regulations, the CSDE must notify the district in writing with reference to the specific regulation(s) being violated. The district must respond to these findings with a specific plan of correction and must provide acceptable documentation for verification of correction within a 12 month timeframe.

The BSE requires the district to consider the identified recommendations and complete the required corrective actions in the enclosed report. Specific activities and timelines are identified to assure compliance with implementation of Part B of the IDEA and Sections 10-76a to 10-76h, inclusive, of the Connecticut General Statutes (C.G.S.), for those issues requiring action.

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An improvement planning session will be held to assist the district in prioritizing the recommended actions and in developing an improvement plan responsive to those recommendations. This session will be arranged and held at a mutually convenient time in the district facilitated by the BSE. A team consisting of at least the following personnel needs to be available to participate during this session: superintendent or administrative designee; director of special education; representatives from general education and special education; and a parent representative for children with disabilities. It is recommended that union leadership and board of education representatives be present in the collaborative planning process. The district may invite any additional members it deems necessary and is encouraged to bring any currently existing district improvement plans to inform this process.

Please review the findings of the report with staff and families in the district. The district is required to submit to the BSE a progress report of activities in six-month intervals to monitor implementation of the improvement plan. Rhonda Kempton, lead consultant from the BSE assigned to your district, will contact you prior to the progress reporting period.

If you have any questions regarding the report or the district's improvement planning session, please contact Rhonda Kempton at 860-713-6924 or e-mail at [Rhonda.kempton@ct.gov](mailto:Rhonda.kempton@ct.gov).

Sincerely,



Charlene Russell-Tucker  
Associate Commissioner  
Division of Family and Student Support Services

CRT:dcs

cc: George A. Coleman, Acting Commissioner  
Anne Louise Thompson, Bureau Chief  
Rhonda Kempton, Education Consultant  
Denise Doolittle, Director of Pupil Personnel Services

Attachment

**Connecticut State Department of Education  
Bureau of Special Education  
Focused Monitoring Report**

**Groton Public School District**

**Key Performance Indicator:** Improve the district's effectiveness of efforts to educate students with an individualized education program (IEP) as demonstrated by procedural compliance with the Individuals with Disabilities Education Act (IDEA), and students with disabilities' participation and performance on statewide assessments.

**Dates of Site Visit:** February 8, 9, 10, 28, 2011

**Date of Report:** April 29, 2011

**Team Members:** Rhonda Kempton, Bureau of Special Education  
Marcus Rivera, Bureau of Special Education  
Nicole Hendry, State Education Resource Center (SERC)  
Linda Kokinis, Connecticut State Parent Advocacy Center (CPAC)

**Activities:**

- educational benefit review process and special education file review;
- staff interviews;
- parent survey;
- student interviews;
- classroom observations;
- review of district policies and procedures; and
- review of district data & professional development listing 2009-10, 2010-11.

**Section 1: Reason for Review**

The role of the Connecticut State Department of Education (CSDE) is to monitor and support districts in improving results for students with disabilities as well as compliance with the IDEA. In August 2010, the Associate Commissioner of the Division of Family and Student Support Services (DFSSS) notified Groton Public School District (GPSD) of concerns regarding data around the achievement of students with disabilities. Based on this data, the Department conducted a focused monitoring visit to determine the causes of the concerning data and to identify strategies to support the district in making improvements and requirements of IDEA for correction.

**Section 2: Common themes**

**a. Parental Involvement and Communication**

The following themes emerged throughout the site visit:

- Various avenues are available to all parents in the district for communication and involvement including a district and school based Web site that is easily navigated for information. A calendar of events for the year is available at the building level. Teachers and parents reported using e-mail, notes, Power School and newsletters as the most frequent means of communication.

- GPSD has an active parent council with a link on the Web site to its calendar, minutes and links to a Wiki page for communication. The superintendent attends the meetings and other school personnel are invited to share information specific to their area of expertise.
- Catherine Kolnaski Magnet School hosts a Family Resource Center, a school based health center staffed with a part time nurse practitioner, social worker, and an off-site community based program so families may walk to school meetings in their area. The district supports a volunteer coordinator assigned to assist schools with the participation of community and parent volunteers.
- Parents surveyed indicated a need for more support from the schools to know how to support their children at home. One parent shared that her child was removed from math for speech and language services but was now struggling with math. The parent was unsure how to assist her child at home with math and was concerned she may not be supporting her daughter at home the same way it was being taught in school.
- Parents surveyed were generally satisfied with the communication received from teachers.
- A few parents noted they were unsure of the delivery of services outlined in their child's IEP, unsure of supports available to their child for extracurricular activities, and had overall concerns regarding the transfer of IEP information to next year's staff. They also stated they were unsure if their child's current general education teachers had the information contained in their child's IEP.

#### **b. Use of Data**

The following themes emerged throughout the site visit:

- During the IEP and special education file review, the team noted that many of the IEPs did not contain relevant data on the present levels of performance and in some cases contained no data at all. In addition, the impact statement on IEPs was not always tied to the data or concern, nor was it stated as to how the student's disability impacts classroom performance.
- Some interviews revealed that while the academic data is collected and reviewed primarily through common formative assessments, staff felt other data should also be considered when making educational decisions. For example, office referrals, attendance data and how many trips a student takes to the health office are all informative when looking at a student's performance.
- Observations of data teams revealed active and student centered discussions among participants. However, through interviews data team members reflected they did not always see the connection between the data meetings and instructional outcomes. When attempting to observe teams, the CSDE staff did not locate some of the teams as they were not meeting in the designated area at the time of the meeting. If these scheduled data team meetings did not occur, then it is possible to conclude that not all staff may embrace the value of data teams.
- It was evident that the district is examining data during established team meetings and beginning discussions on what steps to take next in adjusting instruction. There were comments regarding a perceived disconnect between completion of district wide forms to document data and meeting decisions, and the relationship of these forms to improved student learning. Staff were not clearly seeing how the documents supported classroom instruction and questioned the purpose of these documents.

### **c. Staff Development**

The following themes emerged throughout the site visit:

- While staff accessed a wide variety of professional development throughout the school year, these activities did not appear to be strategic or well planned within the scope of the district's larger goals. Teachers selected professional development opportunities from a menu and then submitted their request to district administration for approval. This appeared to be reactive to the desires of individual staff members based on their interests at the time, instead of related to the practical planning for student improvement and the needs for staff to build capacity to address student needs.
- *Introduction to Scientific Research-Based Instruction (SRBI)* training was required at all schools and building based professional development which included paraprofessionals, was offered for Positive Behavior Interventions and Support (PBIS) in two schools. Other trainings were also offered regarding autism, writing, bullying prevention and diversity training. Some of the trainings were mandatory while others were not.
- Paraprofessionals reported receiving minimal district-supported training specific to their role supporting students in the general education classroom. It was shared that special education teachers were their mentors and role models. Special and general educators reported a need for more time to train paraprofessionals.

### **d. Access to General Education and Student Engagement**

The following themes emerged throughout the site visit:

- Leadership reported frustration with the lack of language arts curriculum for the district. Comments were made that this caused a lack of commonality that created inconsistencies across classrooms, grades and schools. Staff further stated that lack of a curriculum highlighted the need for setting higher expectations for students and knowing what they are, increasing rigor for all, doing a better job with tier one common core, and doing a better job matching the intervention to the need of the student. Interviews with staff also reflected confusion between curriculum and programs. For example, when questioned about their access to the curriculum their responses were about what books they use or have access to as opposed to alignment with local, state or national standards.
- Observations revealed co-taught classrooms that were very effective with smooth transitions between the general education teacher and special education teacher. Students accessed grade level content that was delivered by both teachers to all students. In these situations the observer could not discern who the content expert was. This suggests that the outcomes for all students were understood by both educators and materials were efficiently adapted to meet students' needs. For this to occur, it is presumed the lesson that was designed considered each and every student, including students with disabilities, during the planning and preparation of the lesson.
- Classrooms that were observed were rich with resources including Promethean Interactive Whiteboards and a myriad of manipulatives. Some classrooms did not make use of the available materials. A leveled library was available in one elementary school for teachers to access and use in their classrooms.
- Most class sizes were small (15 to 20 students) and had several staff members assigned and participating in the delivery of instruction. For example, one classroom of 18 elementary students had four adults. This suggests the district is also rich in personnel to support classroom teachers and academic instruction. Adults were positioned around the room in close proximity to students, adding to the discussion, and clarifying directions

for students. It was difficult to discern the role of each individual with regard to content expertise and responsibility for delivering instruction.

- Students with disabilities appear to be included in the same activities as nondisabled peers. However, one instance of an observed disconnect occurred where an adult was working on reading with a specific student in a classroom while the whole class was being instructed in a math lesson. Also, a parent responded in the CPAC phone survey that their child was not supported for certain activities and the parent was required to attend these activities in order for her child to participate.
- The district appears to include students with disabilities extensively in the general education classrooms and seeks out these opportunities. In a building that housed a self-contained classroom, it was shared that these students are all included in the general education setting as often as possible such as lunch and unified arts classes. However, when questioned about the lack of achievement for students with disabilities, several responses from staff and leadership reflected a belief that the students with disabilities were not capable. This belief of low expectations is the core explanation for the gap in achievement for students with disabilities.
- Paraprofessionals reported they did not review the individual student's IEPs. Paraprofessionals typically learned about students from the case manager. The paraprofessionals were unable to articulate expected outcomes for the students they supported outside of "getting their homework done." Paraprofessionals reported communicating with the case manager as the primary means of resolving any concerns or issues with students, including any communication with parents. It appeared paraprofessionals are assigned to students based on staffing needs in response to a transient special education student population. As students with IEPs came or went, the paraprofessionals were rotated to meet the staffing requirements of students' IEPs. This may create a need for additional training or opportunities for the paraprofessionals to communicate regarding the students they support and their individualized needs.
- One student was unaware of his IEP or need for special education. One student reported what worked best in the classroom for him and was able to articulate his desire for other teachers to implement the same strategies and accommodations. Another student reported checking his status every day on PowerSchool. Most reflected that their case manager understands their needs but were not sure if the general education teachers were as cognizant of their needs.

#### **e. Additional Information**

The following themes emerged throughout the site visit:

- In some buildings, the rotation of schedules appeared to cause difficulties around staff having opportunities to collaborate and plan. This is problematic for both special education and general education staff in a number of ways. It was noted that in some instances, there is no common planning time for teachers in the co-teaching model. Some teachers reported no time at all while others said they had time; however, it was created by the teachers, not the district's administration. The absence of collaboration and meeting time between general education teachers, special education teachers, paraprofessionals and unified arts teachers working with students with disabilities is also an area of concern. The district has allotted time for data team meetings, however, there is a reported lack of district-wide support for collaborative planning which does not allow

for effective communication around IEP implementation and monitoring progress on the IEP.

- Currently, the district is undergoing revisions to its district improvement plan. While all staff had a strong desire to move forward to improve the learning for all students, the lack of a finalized improvement plan prevents staff from working under a shared vision, mission and expectation. During interviews it became evident that staff have a desire to educate their students under a unified purpose and are anxious to know what the district improvement plan will entail and how they will be held accountable for meeting its goals.
- Some individuals reported a transient student population as a challenge. This made receiving student records and implementing appropriate programs for the students with available staff difficult.
- Some staff reported frustration with the new programs (Foundations, Lexia) being introduced while not having enough time to effectively implement or practice an existing program. Others wanted to know what the researched based programs were and how to better match students to effective interventions.

### **Section 3: Findings of Noncompliance and Corrective Actions**

The first day of the visit began with an abbreviated review of IEPs through the educational benefit review process. Both district staff and focused monitoring team members attended throughout the day. While not specifically making a determination about educational benefit, this process allowed the team members to identify areas of noncompliance. A full file review also occurred to further address areas of noncompliance. If systemic noncompliance was suspected, the team reviewed additional files to verify the systemic nature of the noncompliance.

The following are specific citations of noncompliance with IDEA that must be corrected and verified as corrected as soon as possible, but no later than one year from the date of this report:

1. **Statement of finding:** Two of the files reviewed did not have a record of access form for reviewers to complete.  
**Regulatory citation:** Regulation of Connecticut State Agencies (R.C.S.A.) Section 10-76d-18a (6)  
**Evidence:** Review of student special education files  
**Corrective Actions:** The district will place a record of access form in all special education student files.  
**Evidence of Correction:** The district must submit an attestation to the Bureau of Special Education that all special education student files contain a record of access form by September 30, 2011. The attestation should include the signature of the Director of Special Education.
2. **Statement of finding:** IEPs do not include concerns of the parent for enhancing the education of their child.  
**Regulatory citation:** 34 C.F.R. Section 300.324(a) (ii)  
**Evidence:** Review of IEPs and student special education files, parent survey data  
**Corrective Action(s):** Ensure all IEPs developed include concerns of the parent for enhancing the education of their child. All special education staff, general education staff, planning and placement team (PPT) chairpersons and pupil services staff are to be informed of the need to include concerns of the parent on the IEP.

**Evidence of Correction:** A consultant from the Bureau of Special Education will conduct an on-site follow up visit to review IEPs developed from September through December 2011 for correction of noncompliance in including the concerns of the parent for enhancing the education of their child. This visit will be arranged with the district no later than December 30, 2011.

3. **Statement of finding:** IEPs did not include present levels of academic and functional achievement including how the child's disability affects his/her involvement and progress in the general education curriculum.

**Regulatory citation:** 34 C.F.R. Section 300.320(a)(1)(i)

**Evidence:** Review of IEPs and student special education files, staff interviews

**Corrective Action(s):** All special education staff, pupil services staff, PPT chairpersons and building administrators are to be trained in the Educational Benefit Review process by November 1, 2011. It is strongly recommended that general education representatives receive training as well.

**Evidence of Correction:** Attendance list, agenda and any training materials used for the training. In conjunction with the above stated follow up visit, the Bureau of Special Education (BSE) will review IEPs developed from September through December 2011, for compliance in the practice of including present levels of academic and functional achievement and a statement describing how the child's disability affects his/her involvement and progress in the general education curriculum. This visit will be arranged with the district no later than December 30, 2011.

4. **Statement of finding:** A statement in a student's IEP requiring "protective holds, transfers, and seclusion as needed." It was difficult to determine connection to the behavior intervention plan as it could not be located in the file.

**Regulatory citation:** R.S.C.A. Section 10-76b-6; Connecticut General Statutes (C.G.S.) Section 46a-150

**Evidence:** Review of individual student file and IEP

**Corrective Action:** Conduct a PPT to review the student's IEP and behavior intervention plan and plan for appropriate supports required to address behavior concerns, eliminating the use of protective holds and transfers.

**Evidence of Correction:** For SASID number 5145060130, submit to the BSE by November 30, 2011, IEP documentation that the above language regarding "protective holds and transfers" is not a restraint which may only be used in an emergency and cannot be written into an IEP as a result of a PPT.

#### **Section 4: Strengths**

1. The district has already begun many improvement activities such as conducting data teams, beginning the curriculum development for language arts, implementing co-teaching and administering common assessments. Implementation with fidelity and improving best practices require a relentless, systemic focus and a considerable period of time to fully develop. However, the district is positioned with new, highly skilled, dedicated administrators partnered with veteran and experienced leaders to meet this challenge.
2. A data warehouse is currently being developed. A centralized registration for students moving in and out of district has also been established. A common form for reporting data has been completed and is being implemented. These foundations will serve to build a strong infrastructure for consistency across the district.

3. Barnum Elementary School's scores on statewide assessments were "superlative" and cited by the United States Secretary of Education, Arne Duncan. Ninety percent of the students at Barnum are from military families, making for a unique educational environment due to frequent moves and parental deployments. Practices at this school can be examined and shared with other district schools to potentially explore solutions to address a transient population that other schools in the district cite as a challenge.
4. The district Web site is comprehensive, user-friendly, informative and transparent. It includes minutes from the parent council meetings as well as links to military organizations the district is involved with. This allows for families that are new to the district to easily and quickly navigate the school and community services available to the military families including services for families who have students with disabilities.
5. High school leadership reported they are presently shifting toward differentiation of instruction and away from leveled classes. This will allow for students with disabilities to participate in and have access to a more rigorous content with successful peer role models to prepare them for transition to post-school opportunities.

### **Section 5: Recommendations**

1. Finalize the district's improvement plan, based on data that includes measurable short- and long-term targets and goals, an accountability framework and a clear structure for meeting expectations both at the adult and student levels. School level plans should also be developed and aligned with the district plan where appropriate, but also address the uniqueness of each building. This would be tied to the revised district improvement plan currently under construction.
2. Develop an accountability system for the effective development and implementation of the language arts curriculum across the district based on the Common Core State Standards (CCSS). The accountability system should determine to what extent teachers are implementing the curriculum with fidelity and make adjustments based on those findings. The curriculum committee should include special education representation and consider speech and language representation as early literacy skills are based in language development. Align the district's common assessments and instruction to the curriculum incorporating existing assessments so as not to "reinvent the wheel." Standards-based IEPs will further lend themselves to the alignment of instruction and assessment for all students focused on the CCSS.
3. Evaluate the culture of low expectations for students with disabilities by investigating possible root cause(s) for this underlying belief. Incorporate strategies into the district and school improvement plans to address the shift to high expectations by considering the existing structures of data teams. Incorporate discussions regarding current data, methodology and practice to address improvements in their present levels of performance. The district should also examine possible best practices at the building level and spotlight successful change agents to share at the district level.

An improvement planning session will take place on May 5, 2011, at the GPSD Central Office Building. The district should bring any currently existing improvement plans, frameworks and/or goals.

Report Prepared By: Report

Reviewed By:

Rhonda Kempton  
Rhonda Kempton, Education Consultant  
Bureau of Special Education

April 21, 2011  
Date

Anne Louise Thompson  
Anne Louise Thompson, Chief  
Bureau of Special Education

April 26, 2011  
Date