

# Integrating Special Education Into Key Authorizer Practices: Rubrics to Examine Charter Applications, Operations, and Renewals

## LAUREN:

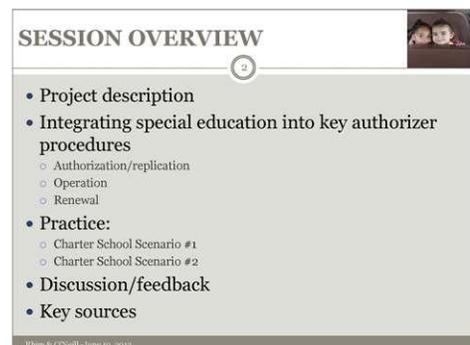
Good afternoon. The focus of the webinar today is integrating special education into key authorizer practices. We'll be introducing rubrics to examine charter applications, operations, and renewals, and I'm presenting a project that was developed that I coauthored with my colleague Paul O'Neill as part of the Building the Capacity of Charter Schools: Effectively Serving Students With Disabilities project and one-day meeting.

The webinar this afternoon will start out with a brief project description about the rubrics, and then we'll actually dive into the procedures involved with looking at the rubrics and how we anticipate folks using them as they're developing their authorizer practices. For the live session, we'll have some scenarios that will lead to a discussion, and then we'll lead to the final slides—being resources—which we hope folks will find helpful as they're exploring these topics more deeply.

First off, we want to start the session by thanking the National Charter School Resource Center and the National Association of State Directors of Special Education. Both organizations have committed significant resources to supporting efforts to improve practice related to educating students with disabilities in the charter sector, and they're the sponsors of the work that Paul O'Neill and I have done to develop these rubrics. I just wanted to thank our sponsors for that.



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So, diving into it.... The rubrics that we developed were in response to the practical reality that 20 years into the charter sector, charter schools continue to struggle to provide high-quality special education programs.



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A variety of issues contribute to those challenges—they're both procedural challenges as well as operational challenges. On the procedural challenge front, you have a core **lack of clarity regarding legal responsibility**. Under the Individuals with Disabilities Education Act [IDEA], the state then assigns responsibility to local districts to provide special education and related services. However, when the laws were written, they didn't anticipate the creation of charter schools, which are autonomous public schools, and, specifically, the law didn't anticipate independent, single school districts or independent schools operating as part of an existing district. As a result, there's been a lack of clarity at times regarding what is the definition of a charter school, and understanding the definition of a charter school really sets the parameters to understand their responsibilities related to special education. Those challenges have occurred both at the state level and, in terms of setting policy, at the authorizer level and implementing it and then, of course, at the school level, in terms of understanding all their responsibilities related to educating students with disabilities.



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The second procedural challenge is also generally connected to state charter school laws [and] pertains to **limited access to standard service infrastructures**. If you were to do a survey and

look across the nation and you look at how special education services are delivered in traditional public schools, you would see a web of organizations, not just local schools and districts, but a variety of intermediate agencies and cooperatives and associations that come together to share resources and to build capacity, especially in the area of low-incidence disabilities—where you may only have a couple of kids with a specific disability—in contrast to what we call high-incidence disabilities—where you may have a large number—so individual schools would be creating programs and expertise to provide students with those types of needs. Due to a variety of things, some being history, some being the state charter school law, in practice, charter schools have not been able to tap into the same service infrastructure that has long been a critical part of what traditional public schools have used to really augment their expertise and the level of service that they're able to provide to children with disabilities. So, those are the procedural challenges, or kind of the background context.

At more of a school level, we have operational challenges, and those challenges, the first being simply **amassing the special education capacity**. Many charter schools are very small, they've got limited personnel, the personnel are wearing many different hats, and it can be very difficult to build special education capacity. This challenge isn't that unique to charter schools. While they are small size and their newness can contribute to it, many traditional public schools also struggle, especially schools in small rural communities can struggle to amass special education capacity, so that's not totally unique to the charter sector.

Next, they're **managing with limited special education dollars**. Again, that's a common theme in many schools, especially small rural schools. But in many districts, or many states, charter schools



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are operating with less, sometimes significantly less, funding overall to operate their schools, and then that, of course, has a domino effect when they're trying to amass enough resources to provide special education services.

The third is **navigating a shared service delivery model**, so in many instances when charter schools are part of a local district, they need to work with their local district to share the responsibilities for providing services for students with disabilities. Ideally, the local district and the charter school will negotiate a very positive relationship where they both see the value they bring to the table and can share delivery of services. Unfortunately, at times that relationship initially isn't that strong. It can be a real barrier to charter schools figuring out how to provide services and simply establishing working relationships with the local district to first decide who provides what services and then to decide how to go about providing those actual services.

The final operational challenge is a more global, just **balancing autonomy and accountability**—how do you operate autonomously and be a mission-driven school while at the same time being held accountable in the same way the traditional public schools are? That can be a real challenge for charter schools as they're trying to figure out how children with disabilities fit into their programs and the mission they're trying to fulfill and then being held accountable for that mission.

While noting the challenges in the charter sector, there are also opportunities in the sector, which I think are particularly noteworthy for children with disabilities in that charter schools are in general—the goal of the charter sector as **mission-driven schools**, that from their core as new schools, they have the opportunity to include students with disabilities by design rather than as an add-on after the fact, and that’s a unique opportunity. Most traditional public schools were operating long before IDEA, and then they figured out over the years how to patchwork in special education services and related services to their program. With a charter school, you have an opportunity to create a school from scratch and really [inaudible] integrate the service and education of children with disabilities into the program from the beginning—kind of a universal design approach as opposed to an add-on—which is an exciting opportunity of thinking differently about how special education is provided.

The second opportunity that’s noteworthy in the sector is to develop **innovative service provision models** in a rapid manner. So, rather than going into traditional schools and saying we’re going to change and redo special education and you’ve got to work with the challenges of driving a change in an environment that’s got very set policies and procedures, a new charter creates an opportunity to develop innovative service models without having to overcome resistance from established service models.

The third strength is that you have the opportunity to cultivate **new special education infrastructures**. I mentioned earlier the existence of cooperatives and associations where people pool resources, but, as the charter sector grows, you’ve got an opportunity to think about delivering special

OPPORTUNITIES  
IN CHARTER SECTOR

Create-mission driven schools that include students with disabilities by design rather than as an add-on

Develop innovative service provision models in a time-compressed manner absent having to overcome existing policies and practices.

Cultivate special education infrastructures and conduct research to track effectiveness and financial sustainability.

Provide online and hybrid/blended learning environments that support highly individualized learning

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education differently and different structures to do that. Whether it's co-op models or creating different approaches to providing special education, individual schools banding together versus multiple schools, and also with these new infrastructures, you've got the opportunity to conduct research to track effectiveness and financial sustainability, which can be very difficult in traditional public schools.

[Audio skip] that provides is exciting when you think about how to educate children with disabilities is the ability to introduce **online and hybrid/blended learning environments** that can be highly individualized for students with disabilities and reflecting the current research about the potential value of technology or technology integration and what it can mean for children with a diverse array of disabilities. Again, some of the earlier opportunities I introduced, the charter sector can generally, or schools in the charter sector can generally, introduce these types of models more quickly, and they're a little more nimble in terms of thinking about doing things differently.

So, there are lots of opportunities in the charter sector to think about doing special education differently. However, the challenge that this project is responding to is that in order to realize the full potential of the charter sector, to take advantage of the opportunities in the sector, schools must **build capacity** in order to be appealing to and be able to educate children with disabilities. What we've seen based on going on 15 years of research and technical assistance is that charter authorizers are really the key players and the ones playing a critical role in building that capacity.



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So, with that knowledge, we decided to pursue a technical assistance project aimed at building authorizer capacity. So, the rubric project. What we realized is that, to date, most of the technical assistance that has been provided related to special education in charter schools has focused primarily on charter school operators.



SPECIAL EDUCATION  
TECHNICAL ASSISTANCE

Problem

To date, most technical assistance related to special education has focused on charter school operators but...

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But we know that authorizers are uniquely positioned because they are the ones that interact with new and replication applicants, the people who want to enter the sector. The authorizers are the gatekeepers of the charter school sector, so they're the ones who have the opportunity to look at an application, to look at what an applicant knows about special education and help them think through the special education policies and procedures during the process of creating their charter. But also they have the opportunity to look at existing schools that are in operation and to examine the extent to which they are offering quality special education services and to ensure that children with disabilities are being provided access to schools and then to hold them accountable during the renewal or the renewal process.



SPECIAL EDUCATION  
TECHNICAL ASSISTANCE

Problem

...charter school authorizers are uniquely positioned to make certain that:

- new and replication applicants have the capacity to educate children with disabilities and
- existing operators are providing high quality special education and related services to all students with disabilities and are complying with all applicable laws, rules and regulations.

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When schools have been operating, whether their contract, whatever the duration of their contract, when they go to renew their contract, there's a chance for the operator to look at their operations and say this is a strength, keep doing this, or this is a problem area, you need to address this. Or, your charter is potentially at risk for not getting renewed. So, the authorizer really is the key entity that can watch over the operations of charter schools to ensure that they're set up and prepared and have the capacity to educate students with disabilities.

So, based on identifying that problem with existing technical assistance work, we created the rubric project. What we did was we developed three phases of a rubric that's a document. It's not your traditional rubric where you give schools a 1 or a 2 or a 3, but rather what it does is it lays out the specific questions that authorizers should be asking applicants and operators and renewal applicants to examine. It provides a definition of what those issues are, identifies the specific questions that the authorizer should be asking, and then has a column in the rubric that identifies some best practices, and I'll present an example of some of the rubric sections in just a moment. So, we worked on developing the rubric with the goal of disseminating it to authorizers in the hope that they would integrate this rubric tool and perhaps modify it to fit their specific state context into their authorizer application process, their monitoring and supervision process, and then their renewal process.

The source of information for the rubric was a research base that both Paul and I, the coauthors of the rubric, as well as other colleagues that have worked extensively in this area. We drew on technical assistance documents that were produced by the National Association of State Directors of Special Education [NASDSE], multiple research projects that were funded by the U.S. Department of Education, namely Project Search and SPEDTACS, based at NASDSE, and then also Project Intersect, which was based at the University of Maryland. That was a straight research project as Search and SPEDTACS were both research and technical assistance. And then the TA Customizer Project, which is funded by the U.S. Department of Education also. It also draws on work that was commissioned by the Center [on] Reinventing Public Education [CRPE] that led to a book about special education in the charter sector, so,

CHARTER AUTHORIZER SPECIAL EDUCATION RUBRIC PROJECT

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**Response**

Develop three phase "rubric" document for authorizers to improve their capacity to support development and maintenance of high quality special education programs to ensure students with disabilities have equal access to charter schools

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RUBRIC DEVELOPMENT

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**Data Sources**

- Existing technical assistance documents produced by: the National Association of State Directors of Special Education (NASDSE)
- Research conducted under the auspices of Project SEARCH, SPEDTACS, Project Intersect
- TA Customizer projects funded by the U.S. Department of Education
- Work commissioned by the Center for Reinventing Public Education (CRPE).

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collectively, that research and that technical assistance base that informs the concept that went into the rubric.

The timeline for the development was June to September of 2011 when we were drafting it. Last October, at the meeting of the National Association of Charter School Authorizers [NACSA], we vetted it with key stakeholders and, specifically, a core group of authorizers both in an invited session and also a general session to get feedback about the content in the rubric, and then we made adjustments to it afterward. Then between last November and this June, we've been revising it and also working on a soft release with select authorizers to pilot it. So, sharing it with a handful of authorizers and then walking through—okay, how can you use this, how can you integrate this into your procedures as well as modify it to come up with a rubric specific to your state context, your authorizer context. Moving forward from June to September, we will be working on finalizing the rubric and disseminating it, documenting the pilot, and developing a brief that provides feedback about the pilot entities—what they learned, how they're using it—that will hopefully help other authorizers as they work on integrating the rubric into their practices.

To turn specifically to the structure of the rubric, based on what we knew from providing technical assistance and connecting research, the three key opportunities for authorizers to really look and do a deep dive regarding special education in the sector—one is **application**, which also could be **replication**, and we think there's a difference. When you're applying as a brand new novice operator, the application process ideally should be different than if you're asking to replicate an existing school—there will be different metrics to

**RUBRIC DEVELOPMENT**

**Time Line**

**June - Sept:** Draft Rubric

**Oct :** Vet rubric with key stakeholders, hold focus group at NACSA to gather feedback regarding content

**Nov - June:** Revise and soft release rubric to select authorizers to pilot

**June - Sept:** Finalize, disseminate, document pilot, and develop brief regarding implementation

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**THREE PHASES**

Application/Replication

Operation

Renewal/Reauthorization

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assess those two applications. Then the second phase of the rubric pertains to **operations**. Once a school is operating, these are the things that you should be looking at as an authorizer. Then the third phase is the **renewal/reauthorization**.

So, we have these three phases, and we also have two rubrics—one is geared toward **charter schools that are part of an LEA**, and the other one is geared toward **charter schools that are their own local education agency** because, as I mentioned earlier, the two, depending on whether you are an independent LEA or you are part of an LEA, you're responsibilities are different.

What's important to note is that the rubric does not present a blueprint of how special education should be done because that should be highly individualized to each school and to each authorizer within the broad parameters of what IDEA dictates but also what the state charter school law. So, what we've tried to do in the rubric is really lay out the key questions that need to be established. So, for instance, you might, one of the questions would be regarding the IEP process and deciding what services children with disabilities need in the charter school. We don't, in the rubric, it doesn't include a statement of what that should look like—the rubric walks folks through. This is a critical process that the authorizer and the applicant or the existing operator need to think through and make sure they've actually got something in place. So, again, the rubric doesn't present a right or a wrong way or a better way to do things, but rather tries to articulate what do we know from practice and also what are the key questions that need to be asked.

So, to go into a little more depth, the rubric addresses multiple issues at the application phase. The first is to provide authorizers with a tool to **assess applicant's capacity**. It's really geared toward asking enough questions, and then an authorizer can establish that this Applicant A understands what special education is, understands the federal law in order to be able to implement it. What we've found in the past is that frequently an authorizer would ask an applicant to agree or assure that they would follow the requirements of the Individuals with Disabilities Education Act, and the operator would sign onto that without any more in-depth analysis of to what extent the operator actually understood what those responsibilities were. That's a key aspect of what the application phase of the rubric aims to tease out.

The second component of the application phase is really to **infuse a layer of transparency** into the authorization process, so that applicants that are applying have a very clear understanding. Our hope is that authorizers would share their version of the rubric with all applicants and say these are the questions that you need to address. It's not you need to provide an assurance that you'll provide special education, but you need to address how you plan to provide services, how you plan to recruit, all of your special education policies and procedures that you plan to implement or how you plan to develop a plan to implement them.

So, what we see as a **blueprint for applicants** about what they need to do to make certain they are prepared to educate children with disabilities. Again, it doesn't dictate exactly what they should do, but it's what they need to be thinking about in order to provide the services.

**APPLICATION PHASE**

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- Provide authorizers with a tool to assess applicant's capacity to provide a high quality special education program,*
- Infuse a layer of transparency into the authorization process*
- Disseminate a blue print for applicants about what they need to do to make certain they are prepared to educate students with disabilities.*

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## Slide 15

The process is different for first-time applicants, as I mentioned already [inaudible] those looking to replicate existing schools. For new applicants, it really is a matter of looking at the group's understanding of the challenges and requirements of serving students with disabilities in the charter setting. For those that are looking to replicate, the authorizer really should be looking for a track record of success. So, you wouldn't want a school that had not successfully educated children with disabilities to be granted another charter to open another school unless they were able to demonstrate that they really could provide services to children with disabilities.

During the operations and the oversight phase, the goal is to help authorizers to ensure that the currently operating charter schools are meeting their obligations related to special education and that they're serving them in a way that meets their educational needs as well as meeting the compliance requirements under IDEA. There are very specific questions about all the—in the rubric, there are very specific components of the aspects of operations that the authorizer should be asking about in their questions related to things like what percentage of children in your school are identified as having disabilities, how do you go about deciding service provision, how do you go about examining outcomes for children with disabilities. Those kinds of questions are important for the operations in the oversight phase.

**APPLICATION PHASE**

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*Process is different for first time applicants than for existing schools looking to replicate.*

*Rubric elements for new applicants focus on indications of the group's understanding of the challenges and requirements of serving students with disabilities in a charter setting; those for schools seeking to replicate focus on the track record already established by the organization.*

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**OPERATIONS & OVERSIGHT PHASE**

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*Help authorizers to ensure that currently operating charter schools are meeting obligations to include students with disabilities appropriately and serve them compliantly for the purpose of building charter school capacity.*

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**Slide 17**

During the renewal and the closure phase of the rubric, it really is a matter of looking backwards and saying okay, you laid out this plan, these are the services you're going to provide, and here's the chance to actually go in and look and say have you met those requirements, and are you providing services to students with disabilities, and did you meet the requirements during the course of operations. Issues that should inform the renewal decision include:

- The approach to Child Find.
- What are the enrollment policies and procedures?
- How did the charter school handle initial evaluations?
- How did they handle development of IEPs?
- Do they provide adequate related services and transition services if they're a high school?
- And then what are the academic outcomes?

Those are key components of the rubric that we would really, through publishing the rubric, we want authorizers to be asking these questions of all applicants looking for renewal because, again, these three key points of contact are an opportunity for an authorizer to check in to make sure that the charter school is operating in a way that (a) is appealing and that children with disabilities are encouraged and excited about applying, but also that they're receiving the services they require to be successful academically once they're enrolled in the school.

**RENEWAL & CLOSURE PHASE**

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*Provide a structure for authorizers to examine individual charter school's practices over the life of charter for the purpose of informing renewal decisions:*

- Child Find
- Enrollment procedures
- Initial evaluations
- Development of IEPs
- Provision of related services and transition services
- Academic outcomes

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## Slide 18

Examples of the rubric categories, Slide 19, I'm not going to go through them, but you can see we tried to be very detailed, so it's as specific as **policies and practices, enrollment, discipline policies, facilities** issues in terms of looking at access. The rubric includes questions regarding if a school has a **virtual or blended learning environment**. These are questions that should be asked. **Staffing and administration** and, again, looking at **academic outcomes** as I mentioned. So those are just examples of the rubric categories that are embedded in each of the three phases.

Policies and practices	Records review	Curriculum and instruction	Assessment
Enrollment	Service provision	IEP development	Staffing/administration
Funding	Discipline	Facility	Parent and community engagement
Transportation	Management companies	Virtual/blended learning environments	Academic outcomes

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Slide 19

Here we have on Slide 20 is an actual example of a component of the rubric. As I mentioned, the first column are the **categories**, the big buckets. For instance, this is an example from the operations phase of the rubric, and the first category I've got here is enrollment and retention, and the second one is admissions. The second column looks at **core elements**, really kind of providing a definition of what we mean by enrollment and retention.

Operations Category	Core Elements	Key Considerations	Best Practices
Enrollment and Retention	Enrollment and retention numbers and categories of students with disabilities and categories of disabilities	<ul style="list-style-type: none"> <li>Does the school monitor the percentage of students with disabilities it enrolls generally? By category of disability?</li> <li>Does it take ongoing steps to ensure the retention of students with disabilities?</li> </ul>	Once the school is up and running, it is important that the plans laid out in the application for fostering the identification and enrollment of students with disabilities are implemented and that the school embraces the ongoing obligation to seek and retain them. In order to ensure success in this area, the school should have a practice of gathering, reviewing, and, where needed, acting on this information.
Admissions	Admission of students without discrimination and in accordance with applicable law	<ul style="list-style-type: none"> <li>Does the school's admission process intentionally or unintentionally impede the admission and/or enrollment of students with disabilities?</li> </ul>	As public schools, charter schools may not discriminate on the basis of disability. Admissions and enrollment practices must be consistent with federal and state law requirements. Charter schools engaging in "counseling out" (i.e., seeking to persuade parents of students with disabilities from seeking admission or from accepting a place in the school) are acting improperly and violating applicable law.

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Slide 20

The third column is **key considerations**. These are what we think are the critical questions that authorizers should be asking. Again, there's no one right answer to these questions, unlike a traditional rubric. We're not providing a this answer gets you one point, this answer gets you two points, but rather these are the questions because based on the research and technical assistance we've done, we found that frequently there's a gap between what operators know and what authorizers have asked of them and some assumptions between those two of authorizers not asking the questions and operators assuming they didn't need to know the answers to these. So, no right answer, but these are the key considerations that we think that if you answer these questions that it provides a much greater chance that the school is going to be

prepared to provide services to children with disabilities. Under enrollment and retention, the key considerations are does the school monitor the percentage of students with disabilities enrolled, does it keep information about the category of disability, and does it take ongoing steps to ensure retention of students with disabilities because it's not just about enrollment, it's about retaining.

Then the fourth column is where we've tried to synthesize much of the research that we've done about special education in the charter sector and to identify some **best practices**. Again, not saying this is the only way to do it, but this is what the research says, and the aim here is that hopefully this will help advance the knowledge about these topics so that each individual authorizer doesn't have to go out and review all of the research and the lessons learned. This is kind of a CliffsNotes version of what we know about the best practices based on what we've seen in the charter sector.

At this point in the live presentation, we'll switch to reading scenarios. In this form, what we've developed is two different scenarios for special education in the charter sector and identified some key challenges as a way to facilitate a conversation about how would you go about addressing these issues, and how could a rubric help address or preempt them from happening. Or, once they're in place, what are some questions and some policies and procedures you could establish to address the challenges.

SCENARIO DISCUSSION

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Read scenarios

Discuss key challenges

Brainstorm strategies to avoid or resolve challenges

Edwin K. O'Neill - June 09, 2014

## Slide 21

The next slide is a discussion based on the content presented and then the scenario discussion that if you are using this at home, this could help you have a conversation internally with your authorizer. Or, perhaps if you're working with a charter support organization, or you're working with individual schools to have a discussion about what are the challenges that schools are facing while educating children with disabilities, what policies and procedures could be put in place to be more intentional to address and preempt problems before they arise, and discussing what strategies you've already developed and the role of the authorizer in helping figure out the solution to the problems.

The final slide for the webinar [is] a list of resources that are the source of the information that's been presented so far and really the underlying base of information that's reflected in the rubric.

Then the final slide is our contact information. If you were to have any questions and you wanted to touch base with me or my colleague, Paul O'Neill, we would encourage you to send us an e-mail—reach out and we're happy if we can't help to direct you to resources that you could find helpful. Thank you very much.

**DISCUSSION**

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What challenges are you facing related to educating students with disabilities?

To what extent could a more intentional, thorough, and transparent discussion of special education pre-empt or address these challenges?

What strategies have you developed to build your capacity to educate students with disabilities?

What role is your authorizer playing in helping you to build special education capacity?

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**KEY SOURCES**

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**QUESTIONS OR SUGGESTIONS?**

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