

## SEAC Feedback on Hawaii's ESEA Flex Application

### General Comments:

Members have commented on the lack of specifics throughout the draft, making it difficult to provide meaningful input. There appears to be a significant disconnect between what is currently happening in the field and what is proposed in the draft. Several of the ESEA activities appear to be emanating from existing practices (i.e. guidance to schools on placement issues leading to an IEP decision-making tool), but SEAC is not aware of any data that substantiates the use of these building blocks. It is therefore difficult to comment on the appropriateness of the future strategies.

SEAC is concerned that the requirement of a two-week turnaround for comments from stakeholders may not be adequate for a feedback loop that results in rich discussion and an improved document. While turnaround time for stakeholder input was short, SEAC is glad to have the opportunity to submit our suggestions and ideas and hope that you will find them helpful.

We look forward to greater opportunities to be involved in future activities around the development, implementation and evaluation of the proposed projects.

SECTION	PG#	QUESTIONS/CONCERNS	RECOMMENDATIONS
<b>Transition to College and Career Ready Standards – Analysis of Learning and Accommodation Factors for Students with Disabilities</b>	17	<p>The Department's application relies heavily on supporting students with disabilities to become college and career ready by including them in the general education setting even though the application acknowledges an extremely low rate of students with disabilities currently being included in the general education setting.</p> <p>The field is using a variety of terms to describe LRE for students with disabilities (general education with support, mainstreaming, inclusion) and there is mixed understanding of inclusive education and the requirements under the Individuals with Disabilities Education Act (IDEA). In high school, some teachers are told that students have to be able to meet grade level standards to be included in a general education classroom, while IDEA says the general ed. classroom should be the first consideration, unless the</p>	<p>Suggest you provide a definition of inclusion and current inclusive practices.</p> <p>Suggest you provide the data from the four-year cycle of general supervision regarding placement of students with disabilities that supports the effectiveness of the IEP decision-making tool and its flexibility in addressing unique student needs. Indicate how parents will be included in the process and provided training.</p> <p>Suggest you include information about LDAH receiving the contract to do parent training under the Po'okela</p>

		<p>student’s needs cannot be met with supplementary aids and supports.</p> <p>Observation from the field is that most students with disabilities are still placed in restrictive settings. Data is not always used for placement decisions, and families are not given adequate information about inclusive education options.</p> <p>The piloting of teacher performance evaluations has made many general education teachers reluctant to include students with disabilities in their classrooms.</p> <p>With Po’okela having such a slow roll-out, it is unrealistic to think that that the model can scale up to all schools by 2014. To our knowledge, only three schools have been identified thus far, and one school has asked to be put “on hold.”</p>	Project.
<p><b>Transition to College and Career Ready Standards – Dissemination of Common Core State Standards to the General Public</b></p>	17-18	<p>Best practices clearly indicate the need for knowledgeable parent participation in supporting students with disabilities to achieve commensurate with their peers, yet many parents of children with disabilities don’t know about the Common Core standards.</p> <p>The CCSS Toolkit is not referenced as such on the DOE website. One has to know to look under “research” to find a link to the page listing Common Core resources. Many parents of students with disabilities do not have internet access at home.</p>	Suggest you demonstrate a robust outreach to parents of students in all grades, especially those parents of students with disabilities, on CCSS and home support techniques. Provide materials in multiple formats.
<p><b>Transition to College and Career Ready Standards – Professional</b></p>	18	<p>Historically, SEAC has noted that special education teachers are typically “the last to know and be trained,” and that professional development for general education teachers who serve students with disabilities does not include adaptations for these students. SEAC’s teacher members have no</p>	Suggest you provide a clearly delineated plan for mandatory training that addresses the need of timely support to line staff and includes information about adapting curriculum and providing

<p>Development for Teachers and Principles in the Common Core</p>		<p>knowledge of how the Common Core State Standards (CCSS) training plan has included special education teachers. (Pg. 24 mentions training to district personnel and related services personnel only). Paraprofessionals who attended a recent CCSS workshop at Kapiolani Community College shared that their teachers did not understand CCSS.</p> <p>It is not apparent in the draft how the hurdles of a loss of Personnel Development days and budget restrictions that limit the ability of schools to provide substitutes while teachers are trained will be overcome.</p>	<p>accommodations to students with disabilities. Include a description of the trainers' capacity to impart the skills in the timeline proposed.</p>
<p><b>Transition to College and Career Ready Standards – Professional Development to Support Students with Disabilities</b></p>	<p>24-26</p>	<p>Many of the elements in the Standard of Excellence Framework are not currently in place (i.e. flexible scheduling and Universal Design for Learning), and require substantial buy-in from administrators and teachers. Listing training modules is inadequate. Implementation details and timelines are needed.</p> <p>It is unclear whether Modules 1-7 involve interaction between the trainer and the trainee or are in video format. Watching a video is not as effective as having a one-to-one coach.</p> <p>There is no stated timeline for the six-step implantation process for the CEE schools, so it is uncertain how long it will take to positively impact student performance and to then scale up to other schools.</p> <p>There is no clear link between the train-the-trainer hierarchy of mentoring mentioned on page 26 and the induction and mentoring program in Race to the Top and whether those teachers will use this model or be on a separate track.</p>	<p>Suggest you provide a clearly delineated plan for mandatory training that addresses the concerns expressed.</p> <p>Suggest you substantiate that training includes strategies for embedding instruction for students with disabilities in the general education standards.</p> <p>Suggest you provide the ratios of coaches and mentors to teacher trainees to ensure adequate support and capacity of teachers.</p> <p>Consider including line staff and community stakeholders in the first wave of training.</p>

<p><b>Develop &amp; Implement State-Based System of Differentiated Recognition, Accountability &amp; Support – Characteristics of Effective Schools</b></p>	<p>37</p>	<p>The plan does not clearly identify, and thus does not alleviate concern, as to how this model will specifically improve the quality of instruction and thus outcomes for students with disabilities.</p> <p>How do the characteristics of effective schools match up with what will be measured at the school level?</p> <p>How relevant and useful are these characteristics in relation to students with disabilities?</p> <p>Attendance and discipline data are also relevant to effective schools. In-school suspensions are not reported but represent missed instructional time for students who are already struggling.</p>	<p>Suggest you include the benchmark indicators for the nine characteristics of effective schools in the appendices.</p> <p>Suggest you identify schools that have succeeded in achieving these characteristics and use them as models.</p> <p>Suggest you include drop-out prevention programs for students with disabilities and re-entry programs for students who have dropped out of school.</p> <p>Offer future plans to address the needs of students with disabilities who miss instruction due to in-school or out-of-school suspensions.</p>
<p><b>Develop &amp; Implement State-Based System of Differentiated Recognition, Accountability &amp; Support – Indicator Three: Student Readiness</b></p>	<p>41</p>	<p>Current suites of college readiness tests do not accommodate all students with disabilities; thus Indicator Three will knowingly marginalize these students, because they cannot participate, nor be counted, in this measure of school effectiveness. If they are not counted, they will not be part of required action plans to improve school performance, and thus a number of students with disabilities will be at a distinct disadvantage for the following reasons:</p> <ul style="list-style-type: none"> <li>- they prefer vocational training to a college degree;</li> <li>- they are unable to get their diploma within 4 years;</li> <li>- they are on a certificate track rather than a diploma track;</li> <li>- they are unable to meet college entrance requirements.</li> </ul>	<p>Offer “bonus” points to high schools based on the percent of students with disabilities who have completed some form of job training or job shadowing experience. Other evidence-based secondary transition practices that enhance post-school outcomes and could therefore be considered for “bonus” points include: student participation in their IEP meeting, training in self-determination, teaching job-related social communication skills and teaching employment skills using Community Based Instruction. For a complete listing see:</p>

		<p>Holding middle schools accountable for their 8<sup>th</sup> grade retention rates may encourage schools to pass some students up to high school without adequate academic skills.</p> <p>Retention at any age, and particularly in middle and high school has been shown in numerous studies to put students at higher risk of academic failure, dropping out, underemployment, drug and alcohol abuse and criminal activity.</p>	<p><a href="http://www.nsttac.org/sites/default/files/assets/pdf/pdf/ebps/ExecsummaryPPs.pdf">http://www.nsttac.org/sites/default/files/assets/pdf/pdf/ebps/ExecsummaryPPs.pdf</a></p> <p>Rather than retaining students based on assessments or grades, we suggest you offer intensive, high-quality Extended School Year academic programs to students at risk of academic failure.</p>
<b>Set Ambitious But Achievable Annual Measurable Objectives – High Needs Students Group</b>	44-45	<p>SEAC is uncomfortable with combining sped students into one super group. Disadvantaged students and ELL students have the capacity to make large academic gains given the proper support, while students with disabilities may gain skills at a slower pace.</p> <p>Given the large workload on teachers, removing the accountability for the progress of one of the sub-groups subsumed in the high risk students group may result in less attention paid to their academic progress.</p>	<p>Rather than combining Hawaii’s high risk students into one category, consider lowering the minimum n-size for calculating accountability (as other states have done) to ensure more students are included.</p>
<b>Set Ambitious But Achievable Annual Measurable Objectives – Participation and Proficiency Targets</b>	46	<p>Members identified pros and cons of adding reporting categories of Native Hawaiian, Filipino, Japanese, Pacific Islander and other Asian (e.g. Chinese, Korean, Cambodian, Vietnamese, Laotian):</p> <p>Con – It will overcomplicate reporting.  Con – The data can be gathered as needed for in-State purposes, rather than making it a federal reporting responsibility.  Pro – Breaking the data down further will help shine a focus of attention on specific groups needing assistance.  Pro – Data is useful to justify intentions and actions when applying for federal grants.  Pro – Acknowledging cultural differences models respect</p>	<p>Suggest you spell out the benefit you anticipate by adding these additional reporting groups.</p>

		<p>and helps to guide effective and culturally sensitive practices.</p> <p>Note: The U.S. DOE requires that Hawaii use the additional category of “Two or more races” in its Annual Performance Report to the Office of Special Education Programs, but members agree that this category “muddies” data collected.</p>	
<b>Reward Schools</b>	51	Members agree with the suggestion by HE’E to change the name category for the highest achieving schools.	Replace the term “reward school” with “recognition school.”