Consultation on
A Standards-Based Approach for
Special Education Programs and Services

Response from the Ontario Association for Families of
Children with Communication Disorders
July 28, 2003

Introduction:

The Ontario Association for Families of Children with Communication Disorders (OAFCCD) was founded in 1994 by families and professionals concerned about the lack of understanding about the needs of children with speech and language disorders.

The ability to communicate is one of the defining characteristics of humans. The ability to communicate effectively is an essential skill in modern society. Children who have communication impairments are at a disadvantage in every way, including their ability to be educated, to be involved in community activities, and to participate in society.

Communication disorders, which includes speech and language disorders, are the largest disabling conditions in society affecting 5-10% of the general population,. Speech disorders may involve saying sounds incorrectly, stuttering or voice difficulties. Language disorders involve difficulties in understanding and expressing thoughts in correct sentences. Children with speech and/or language impairments will often have difficulty learning to read and write.

Professional intervention can make a big difference. Students who get help are more likely to feel better about themselves, get along well with others, be more independent, read better, stay in school, and be employed. Without help, children are more likely to develop behaviour problems, be in trouble with the law, end up on welfare, and have poor relationships with others.

General Comments on the Discussion Paper:

One of the difficulties of planning and delivering special education services is that there is no commonly accepted definition of who receives special education programs and services. The experience of OAFCCD SEAC reps, at the school board level, suggests that all school boards include students formally identified through the Identification and Review process (IPRC) and students for whom an Individual Education Plan have been developed. However, some boards also track students who have been 'flagged' or identified through early identification processes and/or those students who are involved with the school based program team. Similarly, the special education budgets for many school boards include early identification and intervention programs.

OAFCCD members believe that one of the first issues which needs to be clarified in a

standards-based approach is who are the target students, and which programs and services are considered part of special education. All school boards are required under Policy/Program Memorandum #11, Early Identification of Children's Learning needs (1982) to have processes in place to identify children with extra learning needs. However, the line between programs and services which are considered early intervention or prevention programs, and those which are considered special education is unclear. In addition, a number of school boards do not formally identify students through an IPRC process and in these boards it is even harder to 'identify' who gets special education services and programs.

There are many benefits to early intervention and prevention strategies which may reduce the level of supports that a student will require in the future. Students considered at-risk for learning problems or who have mild disorders who are provided the necessary early interventions may not need an IEP or qualify for identification through an IPRC. For students with communication disorders the line between early intervention and special education is especially blurred.

Many communication disorders are lifelong disabilities which become apparent at key developmental stages, including when the speech patterns of young children vary from normal, when a student is learning to read, or later when a student is expected to read to learn. Students with communication disorders may also have difficulty in higher grades when they are expected to listen to learn, and when a rotational schedule involves multiple teachers and more complex or abstract ideas.

OAFCCD encourages parents to get the programming suggestions provided for their child documented in an IEP and to ask for an IPRC to determine if the student qualifies for identification. The IEP and IPRC are both regulated through legislation and standards and provide important protections for students. However, in many boards the services provided by Speech-Language Pathologists do not result in either an IEP or the IPRC process.

It is, therefore, critical that the Ministry provides clarification about which students, or which programs and services are considered to be part of special education, and funded through the SEPPA and ISA grants. With this clarification, the proposed standards should be revised considering the following comments.

Accountability:

In reading the discussion document, it is not clear who will be accountable for implementation or monitoring of the proposed standards.   Some of the standards specify individuals, (Principals or Teachers) and some mention school board roles.   Many are unclear about accountability. OAFCCD would suggest that the responsibility and accountability should be at the school board level.   The standards could then be written in terms of the policies, practices and procedures that school boards should have in place to ensure students are provided adequate and consistent programs and services.

Relationship with other Ministry Standards:

OAFCCD members were very disappointed that the Ministry has not released exceptionality specific program standards. The extensive work of the Volunteer Resource Groups over the past two years had led to an expectation that the Ministry will develop exceptionality specific program standards, and in reviewing this document it is hard to see how these common standards fit with the existing IEP and Special Education Plan Standards and the future exceptionality specific standards. Some of the proposed standards are actually principals and will be difficult to implement without regard to exceptionality specific situations. Some appear to duplicate standards already developed for Individual Education Plans or Special Education Plans. It is important that these relationships be defined and clarified.

Eight of the 20 proposed standards concern assessments, and this seems to be a very high proportion. OAFCCD is concerned that this will contribute to an overemphasis on labeling and documentation rather than program implementation and outcomes. Closer examination suggests that some of the Assessment standards can be combined or should be included in the IEP Standards.

In reviewing the 20 proposed standards it seemed that sometimes the wording of the standard does not capture the intent as described in the subsequent notes. For example, Standards 5 refers to "alternatives to formal assessments" when in fact it means alternatives to assessments administered by board staff.

The language used in this document is sometimes unclear and inconsistent with the language and terms used in other Ministry documents. OAFCCD believes that the terms used should be clearly defined and consistent with legislation and Ministry of Educations Policy and documents. For example, the terms "Program Interventions", "Levels of Service" and "Standards for Instruction" are not clearly defined or consistent with other policy documents. Also the term "exceptional students" has a specific meaning in Regulation 181 and it is only used in Standard 1. Does this mean it applies to all other standards or only Standard 1?

Standard Specific Comments:

A. Standards for Assessment and Program Planning

There seems to be a disproportionate number of standards related to Assessment and OAFCCD would recommend that several be combined. OAFCCD suggests combining the Standards 1, 7 and 8, and Standard 2, 3 and 4 as follows:

Standard 1 *Assessment for Program Planning***, Standard 7** *Range of Assessments* **and Standard 8** *Program Planning and the Ontario Curriculum*

Suggested re-wording: "When more information is needed to plan and develop programs and services for a student, a range of formal and informal assessments will be used. This may include informal assessments and formal assessment tools which are appropriate for the age, health and abilities of the student."

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Standard 2 *Informal Assessments*, **Standard 3** *Referrals for Formal Assessment* and **Standard 4** *Parental Consent*

Suggested rewording: "Informal assessments for individual students for whom additional information is required, may be different from on-going procedures that teacher uses to identify students level of development, learning abilities and needs. Referrals for formal assessments should result from school based program development processes, which includes consultation with parents and informed consent."

The suggested re-wording would address several of the concerns that OAFCCD has with the individual standards. Comments on each individual proposed standard follow.

Standard 1 *Assessment for Program Planning*

This seems to be a motherhood statement or principal, rather than a standard of assessment services.

The explanation does not focus on the standard but rather provides a definition of types of assessment. OAFCCD is concerned about the definition of *formal assessment* as it seems to be mixing services provided by professionals under the Regulated health Professionals Act and educational assessments conducted by special education staff and teachers. The definition needs to be revised and school boards provided with clear direction on education assessments. The term *parental consent* also needs to be clarified. Does it means written consent, or informed verbal consent? What happens if parents do not respond to written requests or phone calls? Can the student needs be assessed without consent, or will programming be developed without assessments?

Standard 2 *Informal Assessments*

There is a lot of confusion about the line between *early identification of learning needs* and *special education*. It is very important that the Ministry provide school boards with direction either through policy or funding guidlines. This issue is especially important for students with speech and language problems as services are frequently provided as an early intervention, without formal identification of student needs.

Standard 3 *Referrals for Formal Assessment*

See above comments on the definition of *formal assessments*.

Standard 4 *Parental Consent*

Regulation 181 and the IEP Standards both promote and support parent involvement in program planning for individual students. The standards also need to encourage parent involvement and written consent, when required. The use of the term "informed consent" should be defined with regard to educational assessments. The term has a particular meaning with regard to the Regulated Health Professionals Act, and professional assessments, and should be used carefully.

Standard 5 *Formal Assessments*

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Grammatical structure of this standard could allow interpretation that Board can develop own alternatives to formal assessments. Wording should clearly indicate that boards are responsible for obtaining assessment by qualified professional when they do not have qualified board staff. The term "stable condition" does not capture permanent or lifelong conditions, or degenerative conditions, such as muscular dystrophy.

Standard 6 *Timelines for Assessments*

Sixty days seems to be a reasonable maximum as it represents 1/3 of school year. However, averbal report for programming should be provided to the teacher as soon as possible following the assessment. OAFCCD is concerned that few boards are currently able to conduct assessments within 6o days, especially when priority is given to ISA claims. There is a potential for school staff to reduce the number of referrals to meet the standard, e.g. only one referral per school, per semester, or only students with the most significant needs.
A great goal, but may not be attainable without more resources. This has significant financial implications. What is accountability if waiting times not met?

Standard 7 *Range of Assessments*

This statement is unnecessary as there is a presumption that professionals will use their judgement in determining which assessment tools will be used for individual students, and that the assessment tools will be age and developmentally appropriate. However, if assessment tools are being defined by the Ministry, there should also be consideration of the needs of ESL students and assessment tools should be culturally sensitive. This does not need to be a separate standard but can be combined with Standard 1 and 7, as described above.

Standard 8 *Program Planning and the Ontario Curriculum*

This standard is unclear and seems to be more like a principal. Everyone would agree that the student's program should be based on assessment results and linked to curriculum. However, not all assessments will clearly link to curriculum expectations, but may be needed to develop Alternative Expectations. Perhaps the standard would be clearer if the statement was reversesd:
     "Program planning will be based on student assessments."
This concept could also be captured in the above revision of Standards 1, 7 and 8.

B. Standards for Program Interventions

The term "Program Interventions" is being used to cover the three types of activities which are not all the same. Accommodations do not change the program, but allow a student to access the curriculum. Ideally the accommodations, modified or alternative expectations will be unique to each student and, therefore, difficult to measure across the school board. It seems more realistic to evaluate whether the same range and levels are available to all students within the board, or to develop measures which determine consistency across the school board. In re-writing these standards the focus could either be in the student:

All students will receive the accommodations,   modifications.....

Or on the role of the school board:

The school board will ensure that all students have access to the accommodations ....

Standard 9 *Accommodations*

Standards implies that there are excepted levels and types of accommodations - not dependent on school board resources.   The IEP would be the best document to describe the types of accommodation required by an individual student.   The program standard can only ask the school board to ensure that all students have equal access to the required accommodations.   This will require direction form the Ministry regarding accommodations permitted for credit courses and the range of accommodations that should be available for each exceptionality.   Some boards may require additional funding to ensure all students can access the accommodations they require.

Standard 10 *Modified Expectations*

There is still a lot of confusion about modifications to curriculum, especially in terms of secondary school credit courses.   How much modification is acceptable for grade expectations and credit courses?   The modifications will be individual to each student, and it will be difficult to measure board compliance.   It may be more meaningful to examine modifications within the IEP Standards. It would also be helpful if the Ministry enforced the IEP standards and required documentation of the human resources required to provide the modified program.   Often this section is incomplete or vague and it is not clear how frequently a student will have access to additional supports.

Standard 11 *Alternative Expectations*

This term *alternative expectations* and the development of programming for alternative expectations is very new and not well understood by all school staff.   Significant professional development is needed to make sure everyone understands what constitutes an alternative expectation, and how it should be delivered.   This is a particular concern in regular classrooms where additional resources may be required.   Professional development is also critical to encourage better definition of the goals and activities involved in alternative expectations which have been traditional described as   "life skills programs".

C. Standards for Levels of Service

The term *levels of service* is not clearly defined and the four standards appear to be concerned with different aspects of service delivery.   It is also important to recognize that some differences in special education service delivery methods and levels is driven by philosophy rather than student needs Boards that have taken an inclusive approach to special education generally do not offer congregated class placements and only limited program withdrawal.   Thus philosophy may result in different approaches to meeting the needs of students.   OAFCCD believes that all

school boards should offer a full range of placements and services, and that students should have choices or options.   How will the Ministry address this issue?

Standard 12 *Use of a Multi-Disciplinary Approach*

It is very difficult to measure a multi-disciplinary approach as it is an approach rather than a tangible item.   Each student is unique and may not require the involvement of the same professionals as another student.   Also professionals, including teachers, vary in their experience and ability to participate in a multi-disciplinary approach.

It is possible to track the involvement of various professionals through the types of input collected for an IEP.   However, the documents will not capture whether a truly multi-disciplinary approach was used.   Within exceptionality specific standards it will be possible to   identify types of professionals that could be involved.   However, the school board can only be accountable to ensure that students have access to a range of   professionals.

Standard 13 *Access to Support in All Placement Settings*

Access to support in all placement settings is critical, but the intensity and levels may vary depending on resources available in each setting.   Congregated settings may include para-professionals who can be involved in delivery.   Inclusive settings may require different and more collaborative approach. Although individual student needs may be constant, the types and levels of supports required will depend on the capacity of the classroom placement.   Support needs will also be influenced by the needs of other students in the class and the skills and experience of the teacher and para-professionals.

This standard could be interpreted as a Ministry expectation that all school boards must offer a range of placement options.   Is that the message the Ministry intended?

Standard 14 *Transitions*

Many boards have transition planning tools related to transition into school and between elementary and secondary schools.   The IEP standards ensure that for students over 14 a transition plan is developed.   This standard would require school boards to demonstrate they have appropriate transition planning tools, and that they are effective in minimizing interruptions..   To check how widely they are used, may require reporting of numbers of transition plans completed in each school.   It is more difficult to address quality of planning or whether plan was implemented.

Standard 15 *Transportation*

Transportation is something school boards may provide but this standards implies it must be provided to special education students.   Is this a new Ministry requirement?   In many boards gifted ad talented students are not bussed to placement.   The term "life of the school" implies students with special education programs and services are bussed on school trips and for extra-curricular?.   This may be more than is provided to regular students without special

education needs. It has significant cost implications.

D. Standards for Instruction

The four proposed Standards for Instruction focus on teacher performance and it is unclear what the respective roles of the Teacher's College and   the school board would be in evaluating these standards. However, the school board is accountable for professional development and resources available to teacher.   OAFCCD recommends that the standards be amended to describe activities for which the school board will be responsible and accountable. (As per the explanation provided in the document under each standard.)

Standard 16 *Instructional Strategies*

Standard should reflect the school board accountability for providing training and resources to teachers regarding instructional strategies. IEPs should include the description of student specific instructional strategies which the teacher will be using..

Standard 17 *Communication Methods*

Standard should reflect the school board accountability for providing training and resources to teachers and classroom staff regarding communication methods.   IEP should include information on student specific strategies.

Standard 18 *Resource Materials*

Standard should reflect the school board accountability for providing classroom   resources and materials which are relevant for student needs.   IEP should include information on student specific resources or materials which may be required.

Standard 19 *Technology*

Standard should reflect the school board accountability for providing training and resources to teachers and school staff   regarding technology.   The school board is also accountable to ensure that the technology reuired by the student is available in the school.   The specific technology required by a student should be documented in the IEP and ISA 1 claim, if appropriate.

Section E. Standards for Professional Development

Standard 20 *Professional Development*

Accountability for this standard concerns responsibility of school board to provide professional development and training.   It is much harder to ensure staff attend and learn.   A single PD day a year focused on special education is not the most effective approach.   School board professional development plans should be more comprehensive covering a variety of training opportunities and building on examples of best practice within the school board and in other boards.

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There is a significant need for more professional development, but it has major cost implications. Over 90% of students with special education needs are in regular classrooms and the professional development of all school staff is a complex task. In addition to training costs, funding will be needed to "backfill" teacher and para-professional positions.

Consultation Questions:

1. Do the standards proposed in this discussion paper clearly describe criteria for the planning and delivery of special education programs and services?

No. OAFCCD has a number of concerns with the inconsistent language and style of the 20 proposed standards, and the lack of linkages to the IEP and Special Education Plan standards. OAFCCD recommends that the Standards be amended based on the above comments and suggestions for the individual standards. OAFCCD also recommends the release of exceptionality specific program standards as it is difficult to assess whether these standards will be effective for different exceptionalities.

2. What methods might school boards adopt to implement the proposed standards?

The standards need to be re-written with the role of school boards clearly defined. Some of the standards address Principal responsibilities and others focus on the Teacher, but the responsibility for implementation and monitoring should be at the school board level.

The first step for implementation is gap analysis or audits of current school board policy and practices. The implementation of IEP and Special Education Plan standards is still not complete, and it is important to recognize that change in practice at the classroom level will take many years. An incentive system that focuses on change at the classroom level could be considered by the Ministry and/or school board.

Many of the proposed standards will have significant cost implications (e.g No. 6 Timelines for Assessments, and No. 15 Transportation) and there needs to be discussion at the outset about how these extra costs will be covered. If they are to be covered by existing resources, school boards will need guidance on how to establish priorities.

3. What factors (such as time frame or staff training) would need to be considered when planning for the implementation of these proposed standards?

The standards would require a multi-year phasing of implementation. The first step would be an analysis by school boards on level of compliance with the proposed standards. Working together the Ministry and school board could then develop an action plan with the cost implications and timelines for change. School boards could then be required to report annually on level of compliance.

OAFCCD recommends that the Ministry of Education funding formula should be revised to reflect province wide special education standards. In particular, the Education Funding should provide adequate funding for minimum ratios of professional staff. OAFCCD recommends that

school boards be funded to employ at least one Speech-Language Pathologist (SLP) for every 1500 students, a ratio that would support a combined direct service and consultative model of service delivery. Ministry funding for professionals should also reflect the exceptionality specific program standards.

A significant level of professional development would be required by classroom teachers and other board staff. The IEP standards have resulted in significant improvements in planning and documentation and there is now a need for s similar emphasis on program delivery. As over 90% of students with special education needs are in regular classrooms this will require a professional development strategy that targets all classroom teachers and staff.

There will also be a need for assessment processes and priorities to be revised to include all students, not just those who may be eligible for ISA grants. There may also be a need for an examination of the language and content of assessments to ensure the information is easily understood by parents and school staff, and relevant for classroom implementation. Currently the emphasis seems to be on labeling and deficits, and the information is sometimes difficult to interpret and implement in the classroom.

4. What business and service delivery practices are already established at the board level that would support the implementation of these proposed standards?

Many boards currently have practices in place that would meet the standards. The first stage would be a gap analysis and then a prioritization of implementation activities. Program reviews are a critical component of this process and school boards will need the release of exceptionality specific program standards in order to complete the gap analysis and plan for implementation of the standards. Members of the Special Education Advisory Committees (SEAC) should have an important role in this process.

5. Will the standards, when applied with standards for Individual Education Plans, result in an increase of consistency and effectiveness in special education and service delivery across the province?

It is very difficult to provide a definitive answer to this question because there are too many unknown factors. OAFCCD has concerns about the way some of the proposed standards are written and believes they could be open to misinterpretation. For example, the standard on Timelines for Assessment could result in less students being referred for assessment in order for a school board to be compliant on the timelines. There also needs to be a discussion about how the costs of implementation will be covered. Will boards be provided with extra money or will they have to re-allocate existing resources?

These proposed standards, like the IEP and Special Education Plan standards, could result in improved consistency and effectiveness in special education. However, it is critical that there is a focus on program delivery and classroom practice, rather than on the paperwork. The IEP standards have improved the writing and content of IEPs, but there has been no process to establish whether students are receiving the program described in the IEP, or if the program is effective. The program standards must be written, implemented and monitored, not only to

ensure that the student and board documents reflect the standards, but that also the individual student program meets the student needs and is effective.