

***Killeen Independent School District
Board Agenda Information Action Sheet***

Date: July 14, 2015

Agenda Item Caption: Consider Proposal by Gibson Consulting Group Inc. for the Special Education Program Internal Audit

Purpose of Agenda Item: Information only Action needed

Administrative Recommendation: Approve the proposal by Gibson Consulting Group Inc. to conduct the internal audit of the Special Education Program to commence with the initial data collection this summer.

Background Information: As discussed at the June 23, 2015 workshop, potential future internal audit areas included Special Education, Technology Services, Human Resources and School Safety, as well as other departments in the future. Commencing the initial data collection this summer for a Special Education Program Audit in the fall will provide necessary time for KISD staff to collect and submit requested data and records prior to the beginning of the school year. This will allow for District staff to focus efforts on assisting campuses and students to initiate the school year, prior to the audit beginning in the fall.

Fiscal Analysis: \$85,735 as outlined in proposal. (Primarily billed to Fiscal Year 2016 budgeted funds)

Regulatory Requirement: None.

Contact Person for Additional Questions/Information:

Name: Dr. John Craft, Superintendent of Schools

Email address: john.craft@killeenisd.org

Telephone Number: 254-336-0003

Attachments: Killeen ISD Special Education Audit Proposal

Signature Requested: Yes No



May 19, 2015

Dr. John M. Craft, Superintendent
Killeen Independent School District
200 N WS Young Drive
Killeen, Texas 76543

Dear Dr. Craft:

At the request of the Killeen Independent School District (Killeen ISD) Board of Trustees, we are providing this letter proposal for Gibson Consulting Group, Inc. (Gibson) to conduct an internal audit of the district's special education program. Gibson will provide this audit through our arrangement with the Texas Association of School Boards (TASB). The following sections describe the scope of this audit, our project approach, our project team and experience in conducting special education reviews/audits, and an estimate of timing and fees.

Project Scope

This internal audit will focus on the degree to which Killeen ISD effectively and efficiently serves students in special education while meeting compliance requirements. During this study, we will address several other questions:

1. Organization and Administration:
 - a) Is the special education department organized to provide effective and efficient oversight for the program? Are functions logically aligned with reasonable spans of control?
 - b) How does the special education department hold itself accountable? Is it meeting student performance expectations?
 - c) Does the special education program have adequate procedures for monitoring compliance with applicable laws, regulations, and policies?
 - d) How has special education spending varied over the past five years? How have spending trends in special education varied with general and other program expenditures on an aggregate and per student basis? What is the spending per student (i.e., based on headcount and per full-time student equivalent)?
 - e) Does the special education program effectively communicate with parents and other stakeholders?
2. Student Identification:
 - a) What are the special education enrollment trends?
 - b) Have there been significant changes in special education enrollment by disability category?

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- c) Has Response to Intervention (RTI) had any effect on special education referrals? Has RTI been consistently implemented across Killeen ISD?
 - d) Are referral processes consistently applied across campuses?
3. Campus Support:
- a) To what degree is Killeen ISD's special education department effective in responding to campus needs?
 - b) What concerns do school-based staff at Killeen ISD have regarding the function of the special education department?
4. Staffing:
- a) Is Killeen ISD's special education department reasonably staffed? Are staffing formulas applied?
 - b) Are positions and job descriptions appropriately defined to support an effective and efficient program?
 - c) Do special education support services staff have reasonable caseloads?
 - d) How consistent are the special education procedures used throughout Killeen ISD?
5. Program Delivery:
- a) What program delivery models are in place at Killeen ISD, and are they effectively supporting student learning?
 - b) How integrated is special education with the general education program? With Killeen ISD's behavioral programs?
 - c) Is there a full continuum of services offered by Killeen ISD?
 - d) How are service decisions made through the Admission, Review, and Dismissal process?
 - e) Are Individualized Education Program (IEP) files complete? Compliant?
6. Operations:
- a) Does Killeen ISD take advantage of available technologies to maximize operating efficiency?
 - b) Are special education student records properly maintained and secured? Are they maintained in an electronic format?

Project Approach

Gibson's approach to this project draws on our previous experience with special education program audits and reviews at other school systems. For Killeen ISD, we will conduct a comprehensive analysis of departmental data focusing on the key questions above and other important issues. Additionally, we will provide specific, actionable recommendations for improvement to Killeen ISD.

In order to ensure the highest return on Killeen ISD's investment, we will conduct the following:

- Analysis of Killeen ISD's special education organizational structure
- Analysis of the central organization's ability to efficiently and effectively support the schools

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- Analysis of departmental staffing levels for administrative and professional support positions in special education
 - Analysis of campus staffing levels for teaching and support services
 - Evaluation of the special education identification and referral processes
 - Analysis of student achievement and other outcomes for special education students
 - Analysis of program delivery models for special education programs, including services for high-need students and analysis of Killeen ISD's behavior units
 - Analysis of Killeen ISD's special education population served by disability, ethnicity, grade, school, and instructional setting
 - Review of funding sources supporting special education – including Medicaid reimbursements and General Fund contributions
 - Review of special education management reporting practices and their effectiveness in monitoring performance and compliance
 - Evaluation of the use of technology to support the efficient management of Killeen ISD's special education department
 - Review of implementation and impact of the RTI program across campuses
 - Observations of instructional and support services provided at schools
 - Analysis of a sample of IEP plans
 - Evaluation of Killeen ISD's communications between central office and school staff, and between Killeen ISD and parents as well as other stakeholders
 - Review of special education management reporting practices and their effectiveness in monitoring performance and compliance

We accomplish these items through a four-task approach. The four major tasks include: (1) initiate project, (2) collect and review existing data, (3) conduct site visit, and (4) conduct assessment and provide recommendations.

These tasks are discussed in more detail below.

Task 1 – Initiate Project

We will conduct a project orientation meeting with Killeen ISD to clarify expectations, to define project roles, to discuss the scope and objectives of the audit, and to finalize the schedule. We will also develop a communications plan for keeping the Board informed throughout the audit. We request that Killeen ISD assign a liaison, who will serve as a single point of contact for this audit and who will coordinate data requests, facilitate site visits, facilitate communication, and perform other tasks critical to the successful completion of this scope of work.

Task 2 – Collect and Review Existing Data

The Gibson project team will need to conduct a detailed assessment of applicable data and other information in order to gain a full understanding of Killeen ISD’s current operations. The more data available prior to beginning the site visit, the more informed and productive the site visit can be. As a result, we plan to provide Killeen ISD with a preliminary data request as soon as the contract is executed. To the extent possible, data should be sent to us prior to our site visit.

By requesting the data prior to our visit, we allow Killeen ISD to collect the information in advance so that they spend less time gathering data while Gibson representatives are onsite. If possible, we would like for Killeen ISD to provide the majority of the data items to us prior to our site visit. This is particularly important for student-level data, as our analysts will conduct comprehensive and sophisticated analyses prior to developing site visit protocols. Results from analyses of data will inform the development of questions for interviews and focus groups (described in more detail below), and will help to target areas of question, identify areas of concern, and reveal patterns that warrant further attention.

For any data that Killeen ISD cannot gather in advance, Killeen ISD should make it available to us on the first day of our onsite review.

Gibson will maintain a data inventory of all data requested and received. This will make it easier for all team members to have access to data collected and will prevent our asking for data already received.

We will be gathering data from a variety of sources including Performance-Based Monitoring Analysis System (PBMAS) reports and other available reports from the Texas Education Agency, board minutes, and additional information included on Killeen ISD’s website, as well as any other information provided by Killeen ISD. Below is a sample of the items that we may include in the initial data request to Killeen ISD.

Initial Data Request

- Special Education Organization chart
- Special education job descriptions
- Number of special education students by ethnicity, placement, special education category, campus, and grade-level team
- Special education student STAAR results, past 3 years
- Special education dropouts disaggregated by grade, ethnicity, and economically disadvantaged
- Special education graduation rates disaggregated by ethnicity and economically disadvantaged
- Special education actual program expenditures, past five years, by fund, function, object, program intent, sub-object, organization, and Killeen ISD department code (in record layout or Public Education Information Management System [PEIMS] format)
- Special education staff roster, including FTE percentage, position title, department, total compensation, hire date, and account code(s) – in record layout format

Initial Data Request

- Instructional arrangements used on each campus (e.g., inclusion, co-teaching, self-contained)
- Special units on the campuses that might include students from other campuses (e.g., behavior units and Preschool Programs for Children with Disabilities [PPCD])
- Number of referrals to special education and qualification rates for last three years by campus
- List of current complaints pending with descriptions of cases
- Third party compliance reviews and reports, including Office of Special Education (OSEP) and Office for Civil Rights (OCR)
- Special education handbook
- Response to Intervention (RTI) handbook
- Description of programs and services for emotionally disturbed / behavior disordered students
- List of staff supporting the behavior units and their responsibilities
- One-to-one paraprofessionals by campus and the disabilities of the students they support
- List of shared service arrangements in special education
- District Improvement Plan
- Campus Improvement Plans (for campuses selected for site visit)
- Number of endorsed teachers for special education
- Number of special education teachers with alternative certification/endorsement by exam
- Number and location of education instructional assistants for special education

During Task 2, we will conduct an audit of selected IEP files for special education students attending school in Killeen ISD. The review will help us to evaluate the completeness, including compliance, of the services and supporting documentation, and to better understand Killeen ISD's processes for admission review, admission dismissals, student goal setting, and decisions regarding student accommodations and services.

Once we have received all requested data, the project team will begin a preliminary assessment of applicable data and other information to gain a full understanding of the current state of special education at Killeen ISD. We will review all materials received to fully understand the state of the special education program in Killeen ISD, the organization of the department, staffing decisions, among others.

In addition, the audit team will collect and analyze archival student-level demographic (e.g., ethnicity, Free/Reduced Price Lunch status, primary disability, age, grade), behavioral (e.g., incidents and dispositions, attendance) and/or achievement data (e.g., standardized test results, grade promotion, credit accumulation) for all students in the district. This analysis will enable the audit team to ask important questions about performance gaps over time, and will enable examination of performance by student subgroup (e.g., by primary disability type, age of referral, grade level, etc.) and to compare performance between students receiving special education services and those not receiving special education services. Results from these analyses will help highlight areas of concern, reveal areas of strength, and will allow the audit team to examine patterns and trends in the data that deserve additional review and exploration during the project period.

Analyses of archival student data and review of district materials and information prior to site work will help to inform interview and focus group protocols to support a more productive site visit. Once the site visit and assessment tasks of the project have begun, we will supplement the initial data request with any other additional data needs.

Task 3 – Conduct Site Visit

Conduct Interviews and Focus Groups

The on-site interviews provide significant amounts of information that may not be available through other sources. We will use interviewing methods extensively as a data gathering technique with district and school personnel. We will conduct interviews with selected district and school personnel as well as special education departmental management and staff. We will attempt to interview all key individuals to ensure that we have a complete and thorough understanding of departmental processes, procedures, operations, and issues. As we develop findings and recommendations, follow-up interviews will be conducted, either in person or over the phone, as needed to validate findings and information.

During each interview, we will use an interview guide to ensure that we achieve the interview objectives. Since we will complete a substantial amount of data analysis before the onsite work, we can dedicate more interview time to understanding the nuance of the Killeen ISD's special education department and its operation, as opposed to general information gathering. We will ensure that all interview subjects understand the purpose of the project and the interview before we begin. We will communicate to all interview subjects that we will not attribute their comments to them in the final report, and that Killeen ISD will make this final report a public document. We will incorporate the results of the interviews, combined with our data analysis, into our final recommendations.

The audit team will also conduct focus group sessions with key stakeholder groups. Like interviews, focus groups are an effective way of obtaining more in-depth information about particular issues but allow for a group setting when many staff share the same responsibilities or when a particular target population is too large for one-on-one interviews. Focus groups allow for a large number of a given target population to be sampled and included in data collection. Like interviews, focus group sessions will allow the audit team to obtain input from district employees regarding areas of concern that may warrant additional investigation during the on-site review. These sessions will take place with teachers and principals. We will triangulate results from interviews and focus groups, with results of materials reviews and analyses of archival data when developing final recommendations.

We will develop a facilitator protocol based on our understanding of Killeen ISD. We will use this protocol to drive the sessions, to ensure that we cover all relevant topics, and to ensure that the session stays focused and well spent.

Conduct Campus Site Visits

The audit team will conduct site visits to a sample of Killeen ISD's schools. We will select the school sites based on a purposeful sample according to the review of demographic, school performance, and Special Education Program data received from Killeen ISD. We will develop structured interview and classroom

observation protocols to ensure consistency in data collected from each of the schools selected for site visits.

Each site visit will include the following structured activities:

- Interview with the school principal
- Classroom walkthroughs and observations for specialized programs in place at the school (e.g., adaptive behavior, life skills, functional independence, behavior intervention, etc.)
- Classroom walkthroughs and observations of inclusion in the general education setting
- Interviews with special education classroom teachers

Task 4 – Conduct Assessment and Provide Recommendations

During data analysis and triangulation, the audit team will identify ways to improve the efficiency, effectiveness, and compliance of the special education program. This audit will involve the analysis of staffing, student identification, school support, program operation, the district’s operations and organization, and other relevant extant data. We will identify ways to streamline processes, increase productivity, and increase the overall efficiency and effectiveness of the special education program.

Our methodology includes triangulating information garnered from the following sources of input:

- Data (district data analysis)
- Classroom and school walk-throughs
- Interviews and focus groups
- Peer district comparison
- Industry best practices

We will also build a longitudinal, within-student data file to enable the audit team to demonstrate and explore performance gaps across student groups and examine changes in those gaps over time. We can examine student outcomes by participation status in different programs, for different genders, by disability types, or based on any variables that represent pressing questions the district might have.

Examples of the types of questions that can be explored include:

- How does student performance change over the transition from elementary school to middle school for students receiving special education services compared to students not receiving special education services? Are there achievement gaps that are more concerning for students from certain subgroups (e.g., by disability type, from particular schools)?
- Are there particular programs for delivering behavioral interventions being implemented in the district that are related to more or less improved outcomes for students? Are outcomes different for students receiving special education services within a given program at different schools?

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- Are there important patterns of differences in student outcomes within the same disability type depending upon the age of referral? Or based upon the amount of time the student has been in the district?

Results from these analyses will not stand alone in the audit of the district's special education programming, but rather will be used to help explain other findings, to direct further lines of inquiry to focus on areas of weakness identified, or to direct further examination into areas of strength that may be considered for sharing successful efforts more broadly across the district. In addition, results from these types of analyses are particularly informative to district decision-makers, for whom the results are often particularly meaningful based on known context within the district (e.g., why a particular program at a particular school may be a particular success, and how that knowledge can inform efforts to share those practices more widely or replicate that program in a new location).

After we have completed the assessment, we will provide a draft report containing the audit findings and recommendations. Killeen ISD will have 10 business days to review the draft and provide Gibson with a consolidated set of comments. Gibson will make the final determination of changes to the report based on Killeen ISD's comments, and will submit a final audit report to the Board. We also anticipate presenting the results of the Special Education Program Audit to the Board.

Our Project Team and Special Education Experience

Gibson Consulting Group has conducted reviews/audits of more than 40 special education programs nationwide. Greg Gibson, the firm's founder, has directed all of the firm's special education program reviews/audits over the past 20 years. He has particular experience in evaluating the cost of alternative instructional arrangements, and his prior work has contributed to the development of state funding weights for special education.

Dr. Kathy Fad, a nationally known expert in special education, has assisted Gibson on every special education project over the past 20 years and will be working with Gibson as a subcontractor on this project. Dr. Fad earned her Ph.D. in special education from the University of Texas at Austin with concentrations in emotional disturbance, learning disabilities, and autism. She has worked as an independent educational consultant for over 30 years, specializing in evaluations of special education programs and services. Dr. Fad's consulting experience includes serving as an expert witness for districts in due process hearings, developing special education curriculum, and professional writing. Dr. Fad's prior experience includes 17 years as a public school teacher and three years as a university instructor/lecturer.

Gibson and Dr. Fad have evaluated special education programs in some of the nation's largest school districts, including the Clark County School District and Fairfax County Public Schools, as well as the Special School District of St. Louis County. We have also conducted special education program audits/reviews for Texas school districts including Leander ISD, Tyler ISD, Katy ISD, and Comal ISD.

Cheyenne Rolf will serve as project manager for this project. She has over nine years of experience as an Associate Consultant at Gibson, working on a wide variety of projects (e.g., efficiency reviews, accounting systems, program evaluation, cost savings, and performance measures) – including four special education department reviews. She served as project manager for and provided technical support on recent special education program reviews/audits, including Katy ISD, Leander ISD, the Special School District of St. Louis County, and served as the project manager for the Fairfax County Public Schools and Clark County School District comprehensive efficiency reviews. Before working at Gibson, Ms. Rolf served as a grant manager for Texas school districts.

Project Timing and Fees

We can begin this project the week of July 6, 2015. Our project schedule and fees are based on the assumption that virtually all data requested will be available by July 31, 2015. It is important that we have an opportunity to analyze this data before our arrival for central office onsite work the week of September 14, 2015.

We will conduct school site visits in mid-September to better understand the special education department and services delivered. We will also use these visits to validate staffing and other data received. Central office interviews will be conducted during this same week. We will submit a draft report by November 6, 2015, and expect to receive consolidated comments back from Killeen ISD within 10 business days. Depending on the number and nature of comments and questions, we anticipate finalizing the report by December 18, 2015.

Gibson will be conducting this project on a fixed-fee basis. At the time of the risk assessment it was estimated that this project would take 500 hours to complete. We will charge a fixed fee of \$85,735 for this work, inclusive of expenses. No additional fees will be charged unless agreed to in writing in advance. The following table outlines the hours and fees required to complete this project organized by major project task.

Task	Hours	Fees
Initiate Project	26	\$4,325
Collect and Review Existing and New Data	50	\$8,375
Conduct Site Visit	86	\$14,720
Conduct Assessment and Provide Recommendations	276	\$45,385
Project Management and Communications / Board Presentation	62	\$9,930
Total Hours and Fees	500	\$82,735
Expenses	-	\$3,000
Grand Total	500	\$85,735

Professional fees for our audit services are based on the following billing rates by project role. Because this project is part of the TASB/Gibson internal audit program, these rates are discounted 10 percent from our standard rates.

Role	Rate
Director	\$185
Senior Auditor	\$170
Program Specialist	\$165
Auditor	\$150
Project Manager	\$150
Subcontractor	At Cost

Gibson will submit an invoice to Killeen ISD at the end of each month based on the billing schedule below.

Month	Percentage	Fees
July	10%	\$8,574
August	5%	\$4,287
September	40%	\$34,294
October	20%	\$17,146
November	10%	\$8,574
December	15%	\$12,860
Total	100%	\$85,735

Payment on invoices is due to Gibson within 30 days of Killeen ISD's receipt.

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We look forward to the opportunity to work with you on this important project. Gibson Consulting Group, Inc. will devote its best efforts to the work performed under this engagement, and any findings, recommendations or other written materials will represent our best professional judgment based on the information available to us.

If you are in agreement with the terms of this letter proposal, please sign in the space provided on the following page and return to us. If you have any questions about this letter, please feel free to call me at (512) 328-0885. We look forward to hearing from you.

Sincerely,



Greg Gibson, President



Accepted by:

Killeen Independent School District

Dr. John M. Craft, Superintendent

Date