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Defining Accountability and Best Practices in Private Schools Which Receive State Funds for Students with Intellectual and Developmental Disabilities

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Defining Accountability and Best Practices in Private Schools Which Receive State Funds for Students with Intellectual and Developmental Disabilities

by

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DEDICATION

Dedicated to

My Loving Husband

Robert Clay Rains

Who is and has always been my greatest advocate. Thank you for the love and support you have shown me for as long as I can remember; you have never questioned my life goals and are always the first one to say yes, even before I do. Without your support this work would not have been possible.

And to

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Who always provided a way when things seemed impossible

Through Him All Things Are Possible.

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ABSTRACT

Accusations pertaining to insufficient accountability for private schools that provide alternative educational options for special education students have led to opposition to those same schools. The opposition results in part from the schools' acceptance of state funded vouchers and scholarships. In Florida, state vouchers provide funds which support alternative educational placement for students from lower socio-economic status and/or who have identified disabilities. Because they are not subject to state or federal government jurisdiction, private schools have the right to set their own policies and procedures to determine appropriateness of curriculum, assessment, accountability, personnel training and development, funding, and governance (United States Department of Education, 2009). In the absence of external standards in these areas, private schools' ability to serve students who would, under public education, be protected under the Individuals with Disabilities Education Act (IDEA) is a matter of dispute. The contention stems from concern that private schools are not held accountable to provide students with the same educational rights that IDEA intended, and that data is not tracked to assure effective educational and financial stewardship. Those opposing educational vouchers question private schools' accountability and oversight, stating that agencies providing these funds and the schools receiving them should have clearly defined parameters to ensure appropriate use of designated funds.

This study applied previous research on identified High Leverage Practices (HLPs) and Evidence Based Practices (EBPs) in public schools to a private school setting to establish accountability measures in private school special education programs which utilize state

vouchers. It identifies those practices which experts concur on as providing a high quality education as they best support the education of students with Intellectual and Developmental Disabilities (IDDs), specific to private education settings which receive state and federal dollars to instruct these privately placed students. The selected practices included teacher professional development to support instruction of students with IDDs, accountability with respect to student progress and measurements of that progress, identification of high quality instruction, opportunities for inclusive activities outside of the separate special education school program, and transition program opportunities to support students with intellectual disabilities.

This research proposes accountability measurements and recommends fundamental standards of practice which align with a high-quality education to best serve students with developmental and intellectual disabilities who are served in private schools which accept state funding.

CHAPTER 1: INTRODUCTION

Background

Special education has transpired from institutional placement to a Federal law mandating inclusion of students with disabilities in general education classrooms. Through this transition, parents have also been brought into this inclusive approach and been given a voice in the education of their child. Parents are recognized as a vital part of the student educational team but may not always agree with the proposed education plan that school team members are recommending. In 1999, Florida offered the nation's first school choice voucher for students with disabilities. While families of these students continue to utilize school voucher programs, there is criticism of the private school lack of accountability and the quality of programming offered to these students as they step out of the protection of IDEA. It is imperative that private schools take seriously the allegations that there is a lack of accountability in their special education programs. This study investigates private schools in Florida that accept state vouchers in the form of the John McKay and Andy Gardiner Scholarships to aid in the education of students who have intellectual and developmental disabilities (IDDs). This study is specific to the special educational choice voucher system and does not include schools that accept tax credit scholarships.

The state of Florida outlines financial stipulations in compliance standards that schools which participate in state voucher programs for students with disabilities, are required to submit an annual audit if that they have received greater than $250,000 in scholarship funds. Additionally, there is attendance and safety compliance reporting required for all schools,

however, there are no requirements that private schools develop individual education plans (IEPs), report to the state measurements of student progress, provide teacher professional development or integrate students with disabilities with non-disabled peers, even though those requirements apply to public schools. This study is not intended to imply that private schools should come under the jurisdiction of state mandates, but rather to explore and document a recognized best-practices standard of services that could be provided and data that could be tracked by private schools that receive state support dollars to educate students with IDDs. The results of the study will identify standards by which private schools might set admissions criteria, measure student progress with data driven assessment, support teacher development in best practices, establish standards of practice, and align with the educational rights of students as mandated in the Individuals with Disabilities Education Act (IDEA) to the greatest extent possible. This level of self-imposed accountability would demonstrate good stewardship of state funds, reliability of the education being provided to families of students, and fulfillment of professional responsibility to educate students with disabilities to promote their independence and contribution to their communities.

Historically, education has not been a choice for students with intellectual differences. In the 1800's, prior to the existence of educational opportunities for individuals with disabilities, there was exclusion, exploitation and even execution of this population (Crissey, 1975; Heller, 1979; Winzer, 1998). It wasn't until the 19th century that society accepted that individuals with disabilities were not aberrant and they began to be recognized as a part of society. Institutions that previously were used to hide these persons from society, began to research ways to train and teach them (Spaulding & Pratt, 2015). Legislation began to initiate ways to protect these

previously banned members of society. Legislation to impact the education of students with disabilities was first enacted in 1975, with the passage of the Education for all Handicapped Children Act (1975). The passage of EAHCA dramatically shifted the landscape, granting all students with disabilities the right to a free and appropriate public education (FAPE) supported by high-quality educational experiences. Revisions to EAHCA resulted in IDEA in 1990, and IDEA was updated to its current version in 2004. With the passage of IDEA, all public school districts were required to develop and provide FAPE for all children, regardless of intellectual abilities.

Spaulding and Pratt (2015) analyzed the history of special education and advocacy for those with disabilities in the United States. Educational systems reflect cultural values, societal norms and attitudes, and the perceived importance of special education and the resources invested in it are largely determined by philosophical and political beliefs based on those cultural and social values. Thus "The care and training of disabled individuals has followed historical trends, not created them" (Winzer, 1993, p. 383). Human development has historically been viewed as impacted by either nature or nurture. If the philosophical stance is that intellect and academic development are mostly impacted by genetics (nature), the educational environment can do little to affect the outcome. In contrast, IDEA strongly advocates that students with disabilities be educated along with nondisabled peers. Such an inclusive environment is consistent with a nurture model where the environment drives the development and academic gains of individuals with disabilities and educational training and resources are of the utmost importance (Spaulding & Pratt, 2015). Acceptance of educational rights has shifted societal views of individuals with intellectual disabilities, and IDEA offers a legislative foundation that

promotes positive educational opportunities and social acceptance (Hensel, 2007). This shift of acceptance is highlighted in the requirement that students with disabilities be educated in the least restrictive environment (LRE) rather than isolated in institutions.

IDEA requires that students with special education needs be provided with FAPE in the LRE, with that environment being determined during the annual development of the individualized education plan (IEP) by a team of individuals most familiar with the student's support requirements (Individuals with Disabilities Education Act, 1990). The law recognizes that the general education (GE) classroom may not be the LRE for every student with a disability and it does not require that every student be educated in a GE classroom regardless of abilities and needs. Thus, IDEA provides for a continuum of alternative placement options for students. These options include "the alternative placements listed in the definition of special education under Section 300.15(b.)1 (instruction in regular classes, special classes, special schools, home instruction, and instruction in hospitals and institutions)" (Code of Federal Regulations Title 34 §300.551(b)(1), 2002). While the LRE directive gives preference for education to take place in GE classrooms regardless of disability, students must be able to make adequate progress or else a more restrictive placement should be recommended (Hyatt & Filler, 2011; Yell, 2016).

While LRE has been a part of the federal special education law since 1975, other later mandates, including No Child Left Behind (NCLB) (2001) and Every Student Succeeds Act (ESSA) (2015), have also influenced LRE placements with accountability standards that require that students with disabilities have access to curricular content and be held to achievement standards equal to those of their peers (McLeskey, Rosenberg, & Westling, 2018). These mandates have resulted in an increase in the placement of students with disabilities in less

restrictive settings (McLeskey, Landers, Williamson, & Hoppey, 2012). Despite the increase in LRE placement since 1980, controversy continues over what the LRE mandate should look like in practice (McLeskey et al., 2012). There is disagreement on whether curriculum and socialization should be emphasized, or whether the effectiveness of the program measured by student outcomes should take precedence (McLeskey et al., 2012). Schinagle and Barlett (2015) and Stone (2019) have argued that where students are educated should not take precedence over instructional quality and student outcomes. This disagreement has spilled over into educational choice for families, so that families may choose to leave the recommended LRE for placement in a private school or home school setting, even though private school placement conflicts with the LRE mandate to educate students in a GE setting. Additionally, given that educational choice is available in Florida, such private school placement is supported by state funds. The use of the McKay Scholarship has grown since its inception in 1999-2000 to 28,935 students in the school year 2019-2020 (Edchoice, 2020a). Likewise, the Gardiner Scholarship has shown an increase since its inception in the 2013-2014 academic year with 1560 students to 13,884 students funded in 2019-2020 (Edchoice, 2020b). Given the growth in use of state scholarship funds as a parental alternative to recommended LRE, determining effective use of these funds by assessing program quality and student outcomes in the discussion of accountability standards and effective private school programs has become more important.

Research by Williamson, Hoppey, McLeskey, Bergman, and Moore (2020) examined trends of least restrictive placement since 1975. In their research, Williamson et al. referred to the United States Department of Education (DOE) (2009) definitions for educational settings as follows:

- General education (GE): Special education students receive special education and related services outside the regular classroom for less than 21% of the school day.
- Pullout setting (PO): Special education students receive special education and related services outside the regular classroom at least 21% but no more than 60% of the school day.
- Separate class (SC): Special education students receive special education and related services outside the regular classroom for more than 60% of the school day in a separate class.
- Separate school (SS): Special education students receive special education and related services in separate facilities, either public or private, or in public or private residential facilities, or in homebound/hospital programs, for greater than 50% of the school day.

Table 1 shows that recommendations for placement in the least restrictive GE setting increased substantially between 1990 and 2015 and recommendations for all other placement settings simultaneously decreased (Williamson et al., 2020). However, while this study shows a continued increase in GE placement as the LRE for students with all disabilities, the rate of increase dropped from 93% (from 34% to 65%) between 1990 and 2007 to 9% (from 65% to 72%) between 2007 and 2015 (Williamson et al., 2020). Similarly, for students with intellectual disabilities, recommended GE placement showed an increase between 1990 and 2007 but then a slight decrease between 2007 and 2015. While prior research indicates progression toward greater inclusion of students with disabilities, it is important to this research to note that Williamson et al. (2020) reported “more than half of all students with IDs were placed in the most restrictive settings in 2007 and again in 2015” (p. 243), regardless of documentation that

these students would benefit from LRE in GE classrooms (Williamson et al. (2020) as cited in Wehmeyer, 2011).

Table 1. 1
Disability Category Recommended Placement Rates

Disability category	Recommended Placement Setting	Placement in 1990 (%)	Placement in 2007 (%)	Placement in 2015 (%)
All disabilities	GE	33.91	65.47	71.56
	PO	36.43	25.34	21.03
	SC/SS	29.62	22.22	19.85
	Total	99.96	113.02	112.44
Intellectual disability	GE	.90	1.40	1.21
	PO	2.60	2.44	1.94
	SC/SS	7.87	4.62	3.87
	Total	11.37	8.46	7.01

Note: Percentages are expressed as percentage of total population of students with disabilities.
Source: Williamson et al., 2020

Regardless of IEP team recommendations, parents may decide that the recommended placement does not provide the support or opportunities that they have prioritized for their student and may elect to use state funds for alternative educational choice, including private school placement. Pairing with the school choice movement, some states (Arkansas, Florida, Georgia, Indiana, Louisiana, Ohio, Oklahoma, Utah, Mississippi, North Carolina, and Wisconsin) have enacted voucher systems which allow families to choose to use state dollars to educate their special needs student in a private school environment (National Council on Disabilities, 2018a).

While great strides have been made in special education and significant research identifies evidence based practices (EBPs) which support the education of students with disabilities in public education settings (Black, Hoppey, & Mickelson, 2018; Cook & Cook, 2011; Cook, Tankersley, Cook, & Landrum, 2008; Cook, Tankersley & Landrum, 2009), there is little evidence to suggest that these practices are used in private schools that serve the same student population and receive state funding.

Problem Statement

While private schools offer alternative educational environments for students with disabilities, lack of oversight and accountability has resulted in a political divide over the ethics of the use of state funds to support the students in these programs. Private schools are using state funds to educate students with disabilities but are not held to the same accountability standards as public schools that serve the same student population.

Purpose Statement

The purpose of this research is to uncover best practices that advance learning for students with IDDs and that can be tightly coupled with accountability plans for monitoring and reporting on the effectiveness of instructional programs, teacher development and family support. This research utilizes a Delphi study (Helmer & Rescher, 1959) to interview a team of experts in private school special education. Their responses are used to derive a consensus about accountability measures that can promote standards for best practices.

Research Questions

From the perspective of experts in private schools for students with IDDs:

1. What evidence-based and high leverage practices are or should be implemented in private schools that educate students with disabilities?
2. What accountability measures are or should be in place in private schools that accept state funding to serve students with special needs?

Conceptual Framework

A blend of philosophical concepts which unite identified special education standards with educational choice form the conceptual framework which is used to bring structure and expert consensus to the analysis of the accountability of private schools that accept state dollars and serve students with IDDs. While the framework is 18 years old, the bones are valid. Roach, Salisbury and McGregor (2002) were part of a consortium to study the effectiveness of state and local education agencies in providing inclusive education. The result of their work was the development of a policy framework to assist states in training and technical assistance to structure standards based reform. While states may not impose policy on private schools, this framework highlights recognized components of effective accountability standards and best practices in special education. It will be used in this work to outline effective standards in private schools using the six components of the framework: curriculum, assessment, accountability, personnel training and development, funding, and governance (See Table 1.1).

Table 1.1
Policy Framework Content Areas, General Policy Goals, and Inclusive Objective

Policy Area	General Policy Goal	Inclusive Policy Objective
Curriculum	Curriculum that embodies high expectations and standards for achieving individual potential.	A curriculum based on standards that are sufficiently broad to support the learning needs of all students; curriculum includes all academic and skills areas.
Assessment	Measuring results for taching and learning.	A set of assessments aligned with state and local standards for student performance that allow for varied assessment and utilize a broad array of accommondations for testing and lerning with minimal exclusions provided for students wth disabilities.
Accountability	Responsibilities among all stakeholders.	A multifaceted accountability system focused on student performance and the process of teaching and learning for all students, instead of compliancemonitoring as the primary emphesis.Contains clear reqards and sanctions applied to schools and localities.
Personnel training and development	Necessary training and tools for all personnel.	A comprehensive system of professional training that supports and encourages the involvement of all personnel in addressing the learning needs of students who have a full range of abilities and disabilities.
Funding	Maximun use of every education dollar	A unified funding system which supports the varied learning needs and abilities of all students.
Governance	Central leadership and suport with local control and responsibility.	An administrative structure within the educational system that serves all students rather than maintaining separate systems for general and special education and other special student populations. In addition, provides local site councils adequate training to include the needs of students with disabilities in their planning.

Source: Roach, Salisbury and McGregor, 2002

Roach et al.'s (2002) study was part of a nationwide initiative to improve the performance of all students and a mandate to improve special education services through inclusion and GE reform. This initiative, known as the Consortium on Inclusive Schooling Practices (CISP) acknowledged that without written policies, states can limit efforts to promote the inclusion which IDEA mandates. This same concern applies to private school use of state funding for the education of students with disabilities in a parent-chosen private educational setting. The state of Florida cannot establish educational mandates for known best practices in the utilization of voucher dollars, therefore limiting the state's oversight of the effectiveness of special education programs in the private sector.

A policy framework can be helpful in organizing how schools serving students with disabilities evaluate policy and determine future policies (Roach et al., 2002). Such a framework could also define policies which outline practices for private schools serving students with IDDs. These policies address accountability measures and alignment with identified best practices to impact student progress, high quality teaching standards, administrative agendas, and protection of the rights of students with disabilities to a high quality education, regardless of loss of protection under DEA. Successful programs should have clear protocols for assessing the needs of special education students. Both Kaufman and Slavin, leaders in the field of special education, have stated that practice in education should be based on solid evidence of effectiveness (cited by Hornby, 2015). There should be strategies for effectively involving parents and ensuring the implementation of evidence-based strategies for instructional practices to include universal design for learning, response to intervention, positive behavior interventions and other supports

(Hornby, 2015). Regardless of student placement, teachers should be utilizing teaching strategies and techniques based on sound practical guidelines and evidence-based practices.

Given the sensitivity surrounding the use of school vouchers and their impact on the mandates set forth in IDEA, and given opposing political and philosophical perspectives, a reflective framework is used in this study to establish intent and evaluate the data. Bon, Decker and Strassfeld (2016) recommended the use of a reflective judgment framework (Dewey, 1933, 1938, as cited by Bon, Decker, & Strassfeld, 2016) in the discussion of school voucher programs. King and Kitchener (1994) believe that reflective judgement offers a "constructivist approach to resolving complex problems" (as cited by Bon, Decker, & Strassfeld, 2016, p. 510), as well as allowing for flexibility in thought. Accountability in private schools addresses sensitive and problematic situations. A reflective framework supports objectivity when there are "conflicting values and opinions" (King & Kitchener, 1994, p. 73). Using a constructivist approach, the accountability of school vouchers for students with disabilities and existing beliefs regarding their use should consistently be reassessed to allow for discussion and progress in their effectiveness rather than ideological debate.

Using a constructivist approach, this research offers expert identification of standards of accountability measures and best practices as they apply to private schools in the instruction of students with IDDs. Creswell and Creswell (2018) state that humans make sense of their world based on "historical and social perspectives". The study leans on the expertise, experience and perspectives of recognized leaders in special education to socially construct recommendations for inclusive educational practices of students with IDDs in private schools. Through an expertise lens, this research provides recommendations which could improve voucher programs

in private schools for students with disabilities by providing recognized accountability measures and standards of best practices.

Overview of Methodology

The study used a Delphi panel methodology (Clayton, 1997; Dalkey & Helmer, 1963; Hsu & Sandford, 2007), identifying experts in the field of private school special education. The Delphi Method allows for systematic analysis of a complex problem though expert consensus communicated from various geographical areas (Ziglio, 1996). The technique has been used by researchers to address such issues in education as forthcoming trends and inclusion of students with disabilities (Putnam, Spiegel, & Bruininks, 1995); identifying aptitudes for regular and special education teachers (West & Cannon, 1988); and identifying effective teaching practices for inclusion of students with mild disabilities. The present study used an interview approach to the Delphi Method to complete phase one of the process, which involved personal conversations with members of an identified group of experts. Because the Delphi technique utilizes a collaborative approach to solving educational problems and decision making, it is imperative to gather reliable professionals or experts in the area of special education in private schools. Phase two analyzed and categorized the data with the objective of identifying common themes among interviewees. Advantages to using a Delphi approach include the flexibility to conduct one-on-one interviews to maintain anonymity and avoid bias group opinion (Clayton, 1997).

It is imperative during the first stage of the Delphi process that all experts understand the objective of the Delphi exercise, or else or questions may be interpreted from a different perspective, making it difficult to achieve consensus. In the case of this study, the objective was to determine EBPs which experts in private school education of students with IDDs identify as

guiding practices in their schools, practices which increase accountability and effectiveness of their programs. These practices are not mandated by the state nor are they tied to eligibility for state funds. By identifying consensus among private school experts, these evidence-based practices and accountability measurements can become a resource which private schools may use to self-assess and put into practice, similar to the BPIE used in public schools.

Significance of the Research

The operational decisions of private schools are independently determined by the administration, board of directors and possibly accrediting body of that school. The results of this study identify criteria by which private schools might measure progress in areas of curriculum; assessment of student academic, social and vocational gains; teacher training and development; accountability; funding compliance; and administrative structure to give merit to those decisions. It outlines fundamental standards of practice which experts in private school education for students with IDDs concur are best practices to implement for successful programs. Such adherence to programming and accountability practices demonstrates good stewardship of state funds, commitment to families, and professional responsibility to educate and promote independence of and community contribution by students with IDDs.

Organization of the Study

Chapter 2 of this study is a review of literature which will show a gap in research as it pertains to standards of accountability and evidence-based practices as they would apply to private school implementation. The literature will describe significant studies which identify accountability- and evidence-based practices in public school special education settings; however

there is inadequate published research to support evidence of the use of these same practices in private school special education settings.

Chapter 3 describes the Delphi Method and the reasons it was determined to be the method of choice for this research. The Delphi technique is often used when determining consensus or prioritizing areas of agreement or direction (Ziglio, 1996). Best practices for special education programs in private schools cannot be mandated by one overseeing organization or educational agency. Yet if experts within the field of special education, such as were identified for this study, identify and recommend evidence-based standards of practice as a means to accountability measures and improved education for special needs students, private schools can align voluntarily to these practices. For this reason, the Delphi Method was determined to be the best aligned strategy to accomplish consensus.

Chapter 4 describes the results of research through the presentation of transcription and analysis. Accountability measures and best practices were identified by experts of private schools accepting state vouchers. The recommendations reflect areas of admission standards staffing criteria, evaluative measures to demonstrate student progress, state aligned curriculum standards, funding and governance responsibilities and identification of professional development standards for teachers. The results of the study are proposed as "Recommendations for Accountability Measures and Fundamental Standards of Practice" to be a resource for private schools serving special education students and receiving state funds through state school choice programs.

Chapter 5 is a discussion of the implications for practice and policy of the resulting recommendations and of the study itself. Limitations of the study are discussed as well as

recommendations for further research. Further research may be done to determine whether additional accountability or EBP exist or are needed for schools serving students with other identified disabilities. Additional research may support legislative recommendations to address the concerns of school choice opponents who maintain that private schools do not have the same accountability standards as public schools. This study and future research may show that private schools can maintain their independence and still align with an agreed upon set of standards that are evidence-based, leading to practices which provide accountability to students, parents, teachers and state funding agencies.

Chapter Summary

This chapter reviewed the history of special education to emphasize the significant social change in acceptance of individuals with intellectual disabilities since 1975. Increased social acceptance has led to a policy of educational placement for students with disabilities. While inclusion is the educational objective and LRE the recommended placement, some school districts struggle to comply with federal guidelines in providing services at the school level. As a result, school choice enables families who are discouraged with public school programs to choose state funds in the form of vouchers for private school placement to educate their students with special needs. This solution resulted in the problem of poor accountability of private schools who receive state money. The purpose of this research is to uncover best practices that advance learning for students with IDDs and that can be tightly coupled with accountability plans for monitoring and reporting on the effectiveness of instructional programs, teacher development and family support. This research is intended to identify voluntary EBP and accountability measures that would improve the standard of programs for private schools who

educate students with significant intellectual disabilities. This voluntary implementation will heighten the standard of educational, social, and vocational opportunities for students with intellectual disabilities who are served in private schools. Specific to private schools using state funds for the services of students with IDDs, the results of this study establish a solid policy framework of fundamental standards and high leverage practices which may be used to improve accountability measures.

CHAPTER 2: REVIEW OF LITERATURE

The historical development of special education and its partitioning into public and private sectors was described in Chapter 1. While private schools are not subject to oversight under state or federal standards, they should provide a viable alternative placement for students with intellectual and developmental disabilities. This literature review further investigates private school educational programs for students with IDDs by considering the various controversies and dilemmas surrounding school choice and accountability practices. Private schools that accept state funds but are not held to the standards outlined in IDEA are not required to offer students with disabilities an Individual Education Plan or to provide placement in an inclusive general education environment. In addition to diminished accountability for student progress, there are no required standards for teacher certification or professional development. The result is variation in quality of programs, services and instructional practices because private institutions determine their own special education guidelines. This review of literature will research identified practices of accountability that are outlined for public schools by the IDEA. It investigates policy on school choice and the impact of that parental choice on students with disabilities. The literature presents evidence-based and high leverage practices that have been used in public schools and establishes standards of accountability required of public school systems, These accountability measures are designed to track and measure student progress. Finally, the chapter addresses parental school choice and the leadership required to develop and support a high quality educational program. The literature will show a gap in research that is specific to private school accountability measures and their use of evidence-based practices to demonstrate measures of student progress.

Individual Educational Plan (IEP)

The IEP is a federally mandated annual plan for each student that is developed to identify a student's present level of abilities, articulate individual goals and outline the special education and related services needed to meet those goals (Harr-Robins, Song, Hurlburt, Pruce, Danielson, & Garet, 2013). It is an individualized means of measuring student progress on agreed upon priority objectives. The U.S. DOE has outlined requirements for the IEP, including monitoring student progress and appropriateness of placement. Students with disabilities also have the right to due process, annual review of the IEP; and triennial reevaluations to determine continued qualification for support services which have been identified (Individuals with Disabilities Education Act, 2004). The IEP also contains specified information about a student and their individually designed educational program, including present levels of performance based on evaluations, classroom assignments and observations made by parents or school personnel. By law, IDEA specifies that the goals described must be achievable within a year's time, broken into short term measurable objectives. These goals are categorized by academic needs, social or behavioral, independent functioning, health, and communication objectives. The IEP also identifies any supplementary services that a student may need to support their educational program and explains how students will participate in activities with non-disabled students. It specifies whether a student will take part in state testing and how a student will be assessed if it is determined that the state test is not appropriate. The IEP is to state how a child's progress will be measured and how parents are to be informed of their student's progress (United States Department of Education, 2000). Additionally, if a behavior plan is indicated, it should be included in the IEP. The IEP team, including the parent, annually creates a signed legal

document which may be reviewed by a court if any party does not abide by the stipulations outlined in the document; thus it embodies a federally mandated means of accountability. However, because private schools are not required to develop IEPs, this protection may be missing for their students.

Least Restrictive Environment (LRE)

IDEA directs that students needing special education instruction should receive it in the least restrictive setting, with that setting being the GE classroom to the greatest extent possible. However, Miami-Dade Public School District (2017) published a review of research on inclusive classrooms that cited a report by The Children's Hospital of Philadelphia Research Institute (2014), which stated, "Clearly, inclusion does not mean putting students with disabilities in regular classrooms and hoping for the best. Students who are eligible for special education are entitled to any accommodations that are necessary to help them access the educational curriculum and meet the goals in their IEPs …" (p. 2).

Just as there has been variability in defining disability, research has identified questions regarding interpretation and implementation of the LRE in which students with significant special education needs should be educated (Hasazi, Johnston, Liggett, & Schattman, 1994; Hornby, 2015).

In IDEA, LRE is identified as:

> To the maximum extent appropriate, children with disabilities . . . are educated with children who are not disabled, and special classes, separate schooling, or other removal of children with disabilities from the regular educational environment occurs only when the

> nature or severity of the disability of a child is such that education in regular classroom with the use of supplementary aids and services cannot be achieved satisfactorily. (Individuals with Disabilities Education Improvement Act, 2004, §300.114)

Although IDEA and LRE regulations favor educating students with disabilities in GE classrooms, they also acknowledge the need for a range of alternative placement options. While IDEA promotes LRE with GE peers, conversely Hasazi et al. (1994) state that other regulations (34 C.F.R. Sec. 300.551) require the option of alternative placements to allow for individualized student needs. These alternative placements include instruction in regular classes as well as special classes, special schools, home schooling, hospitals and institutions.

The definition of LRE is the cornerstone of protection of the rights of and services for those with disabilities. A question that arises is, by whose definition is an environment least restrictive when the needs of students are as variable as their disabilities? In earlier rights to education cases *(Pennsylvania Association for Retarded Persons vs. Commonwealth of Pennsylvania*, 1971, 1972), the court upheld legislation in support of students with disabilities' rights for educational placement in the LRE. The court determined that placement in a GE class was the preferable placement over any other type of program or setting (Taylor, 2004). While support for LRE continued to grow with the Council for Exceptional Children endorsement of LRE (1976), the American Association of Mental Deficiency policy statement (1981), and the Resolution on the Redefinition of the Continuum of Services by The Association of Persons with Severe Handicaps (1986), the meaning behind the principle remains vague. The LRE is viewed as a stage in a hierarchical placement sequence based on level of restriction. "Restrictive" is

described as the most segregated with the most severe and intensive services and "LRE" as the most independent, integrated environment with the least intensive services (Taylor, 2004).

If it is determined that the if the GE classroom is not the identified LRE, the school system must provide a continuum of alternative placements and services to meet the needs of the child (*Oberti v. Board of Education of the Borough of Clementon School District*, 1993, as cited in Stone, 2019). There have been judicial rulings such as *MA Ex Rel. GA v. Voorhees Tp. Bd. of Educ.* (2002) in the U.S. District Court for the District of New Jersey where it was determined that the least restrictive setting was outside of the GE classroom. This ruling supports IDEA's recommendation that the LRE is not inflexibly interpreted as GE placement for all students with disabilities (Stone, 2019).

Melanie Musgrove (2017), former director at the Office of Special Education in the U.S. DOE, outlined policy recommendations which would support increased effectiveness of IDEA. One recommendation was to consider to what extent the continuum of educational placements assumes that special education is about the physical location and not the services which a student needs to be successfully educated. Musgrove further emphasized the benefits of evaluating student strengths and abilities rather than highlighting the limitations and supports that will be needed in a particular environment.

Schinagle and Bartlett (2015) presented a historical array of court cases which have weighed in on the interpretation of LRE, resulting in rulings that point to a cascade model of appropriate placements and not a one size fits all mandate. For example, in *Sacramento City Unified School District Bd. of Educ. v. Rachel H.*, parents petitioned the U.S. Court of Appeals for the Ninth Circuit, 1993 (as cited in Schinagle & Bartlett, 2015) for placement in a regular

classroom for their child with intellectual disabilities. The Court worked to determine what factors were necessary for compliance with IDEA and assessed that there were four considerations in determining placement: "(1) the educational benefits of placement full-time in a regular class; (2) the non-academic benefits of such placement; (3) the effect [the child with the disability] had on the teacher and children in the regular class; and (4) the cost of mainstreaming [the child]" (Sacramento City Unified Sch. Dist., 14 F.3d, 1993, as cited in Stone, 2019, p.6). These four factors, as they were first identified in *Daniel R.r. v. El Paso Independent School District* (1989) were adopted as conditions that the school district must consider when determining if the educational setting is appropriate. As did Stone, Schinagle and Bartlett referenced numerous court cases in their research of LRE. Their research cites the U.S. Court of Appeals for the Fifth Circuit in *Daniel* which recognized that, prior to IDEA, the Education of the Handicapped Act allowed for a continuum of alternative placements and not an all or nothing educational placement. The ruling in *MA ex rel. GA v. Voorhees Township Board of Education* (2002) resulted in the placement of a student with autism in a self-contained out-of-district classroom that was identified as a less restrictive setting than the inclusive arrangement of his district program. The court determined that the student had no real interaction with peers in a mainstream setting of homeroom, art, gym and lunch, despite the testimony of experts for the parents that he was receiving "parallel skill development". As a result, it was ruled that he was not receiving meaningful educational benefit. The Court ruled that compliance with IDEA and FAPE would be best achieved by designating the LRE to be in an out-of-district self-contained

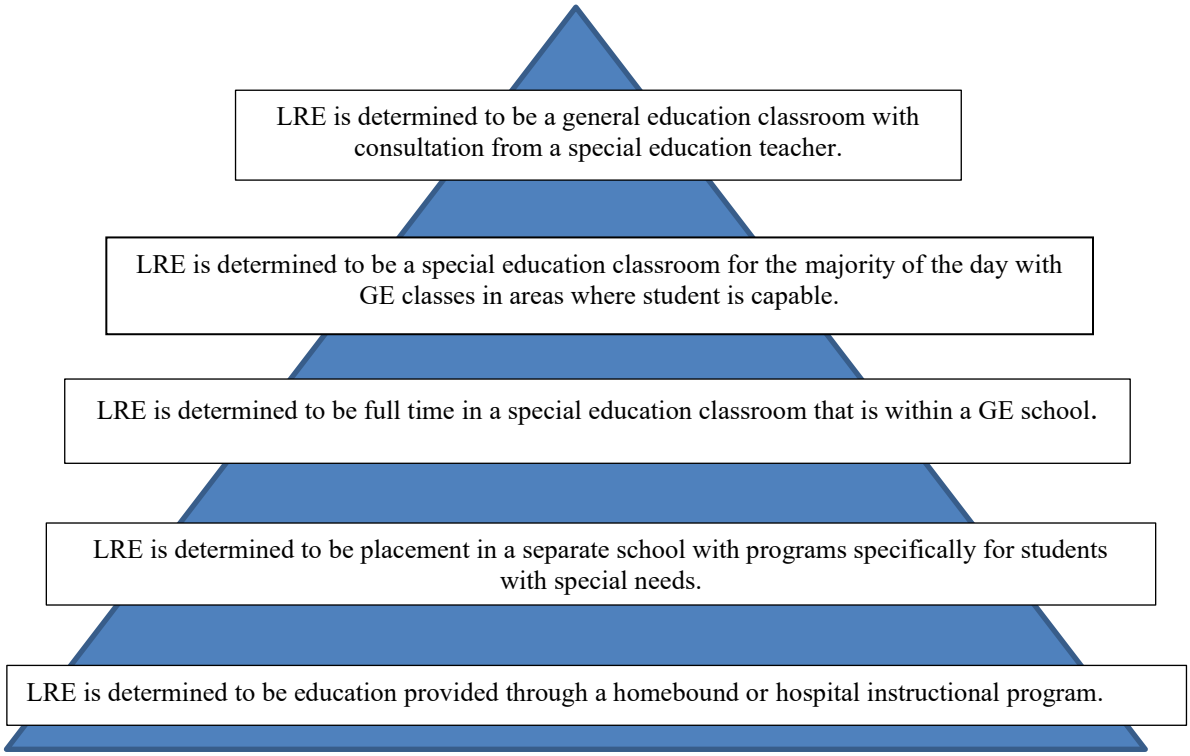
program. This ruling is an example of exploring alternative options before interpreting LRE as a regular classroom placement.

More recently, precedent was set when the U.S. Supreme Court attempted to clarify the interpretation of appropriate education as it pertains to students with more significant disabilities in *Endrew v. Douglas County* (2017). The parents sought state funding for private school placement in a school specializing in educating students with autism. In this case the key factor was the lack of progress of the student in the current setting. The Court determined that IDEA required more than minimal annual progress, directing advocates to expand the meaning of LRE beyond placement and that the placement "must offer [education that is] reasonably calculated to enable a child to make progress appropriate in light of the child's circumstances" (*Endrew v. Douglas County*, 2017). In the *Endrew* case, the Court referenced *Board of Education of Hendrick Hudson Central School District. v. Rowley* (1982). In this case it was determined that IDEA mandated FAPE to include a program which was "reasonably calculated to enable the child to receive educational benefits". A "reasonably calculated" educational program was identified as an educational program that is developed by expert school officials with input from the parent or guardian. The IEP must be written so as to allow a child to make progress on their plan for academic and functional advancement. The degree of progress should be child-specific to meet the student's unique needs (U.S.Code, §1401.(14). The arguments presented in *Rowley* offered guidance regarding students that are fully integrated into the GE classroom, but not students who are not fully integrated and are unable to perform at grade level. *Endrew vs. Douglas County* emphasized that a child's IEP should not reflect grade level advancement if that is an unreasonable goal for that student; however the educational program should provide the

opportunity for the student to meet challenging objectives with a standard of more than minimal progress (*Endrew vs. Douglas County*, 2017).

IDEA outlines that the school district should ensure a continuum of alternative placement options. This continuum of services ranges "from the least restrictive placement in the regular education classroom to the most restrictive placement in a hospital or institutional setting." (Reynolds & Fletcher-Janzen, 2007). Thus, decisions of placement remain under the control of the IEP team (including the parent) and individual decisions are based on student needs. This cascade model recognizes placement in the regular educational classroom as the "primary and optimal setting," and a child would be moved to a more restrictive setting only for "compelling educational reasons and . . . moved back as quickly as possible" (Deno, 1970). Figure 2.1 depicts the LRE in Deno's cascade model. In addition to the placements shown in Figure 2.1, Florida employs support services including individualized support and specialized instruction which is delivered by a special education teacher within a GE classroom. As recorded in Florida state statutes, "school districts may implement additional teaching strategies that include the assignment of more than one teacher to a classroom of students for the purpose of improving learning opportunities for students, including students who have disabilities" (Florida Statutes Definitions 1003.5(a)6. F.S.).

Figure 2.1 Deno's model for LRE



Source: Deno, 1970 (p. 235)

Students with disabilities should expect to receive an educational program that will identify and support progress to meet their potential. Special education services are identified in Florida State Statutes as a "means [of] specially designed instruction and such related services as are necessary for an exceptional student to benefit from education" (Florida Statutes Definitions. 1003.01(3)(b) F.S.). The statute identifies such services may include "transportation; diagnostic and evaluation services; social services; physical and occupational therapy; speech and language pathology services; job placement; orientation and mobility training; braillists, typists, and readers for the blind; interpreters and auditory amplification; services provided by a certified listening and spoken language specialist; rehabilitation counseling; transition services; mental health services; guidance and career counseling; specified materials, assistive technology devices

and other specialized equipment; and other such services as approved by rules of the state board" (1003.01(3)(b) F.S.). These services may be provided in an inclusive setting which fosters appropriate social/emotional development and higher levels of achievement; however, a one size fits all approach is contraindicative of the individuality that is indicated for special education. Thompson, Walker, Shogren, & Wehmeyer (2018) suggested a systematic approach to assessing the support needs of students, an approach that is specific to curricular demands, instructional strategies, and participation requirements. They recommended a problem-solving approach founded on three questions: What to teach? How to teach? Where to teach? These questions serve as a guide that enhances the capacity of schools and GE classrooms to educate all students with the emphasis on an educational program that meets that child's needs (Thompson et al., 2018).

Evidence Based Practices (EBPs) and High Leverage Practices (HLPs) in Special Education

IDEA and ESSA promote the identification and use of evidence- or research-based educational practices for the instruction of special education students (Sanders, Jurich, Mittapalli, & Taylor, 2013). The term evidence-based practice (EBP) is used to denote "practices and programs shown by high-quality research to have meaningful effects on student outcomes" (Cook & Odom, 2013, p. 136). Sackett (1996, p.71) defined EBPs as "the best available external clinical evidence from systematic research". To establish a "central source of scientific evidence for what works in education", the U.S. DOE founded the What Works Clearinghouse (WWC) in 2002. This clearinghouse categorized evidence of educational effectiveness as strong, weaker or insufficient. The parameters set forth by the WWC require that only randomized controlled trials,

quasi-experimental designs, regression discontinuity design and single-case design studies be considered eligible for review and comparison of standards. Qualitative research studies may only be used to provide insight about how interventions may work and identify factors that may influence the how the intervention is implemented or what the results may be. Studies which are eligible for review are compared against WWC standards to assess the causal validity of findings reported as effective educational research. The WWC standards stress the validity within a study rather than the likelihood of replication.

In addition to EBPs, the Council for Exceptional Children partnered with the Collaboration for Effective Educator Development, Accountability and Reform to develop and publish a set of high leverage practices (HLPs) for special educators (Council for Exceptional Children [CEC] and Collaboration for Effective Educator Development [CEEDAR], 2017). These practices were developed in efforts to identify improved methods for supporting special education teachers as research indicates that improving teacher effectiveness impacts student proficiency (CEC and CEEDAR, 2017). The criteria that were used to select CEC's HLPs for special education teachers represent the most effective practices in special education and are foundational to the development of effective instruction. Twenty-two HLPs identified by CDC and CEEDAR address critical practices in special education in four categories:

Collaboration High-Leverage Practices

1. Collaborate with professionals to increase student success.
2. Organize and facilitate effective meetings with professionals and families.
3. Collaborate with families to support student learning and secure needed services.

Assessment High-Leverage Practices

4. Use multiple sources of information to develop a comprehensive understanding of a student's strengths and needs.
5. Interpret and communicate assessment information with stakeholders to collaboratively design and implement educational programs.
6. Use student assessment data, analyze instructional practices, and make necessary adjustments that improve student outcomes.

Social/Emotional/Behavioral High-Leverage Practices

7. Establish a consistent, organized, and respectful learning environment.
8. Provide positive and constructive feedback to guide students' learning and behavior.
9. Teach social behaviors.
10. Conduct functional behavioral assessments to develop individual student behavior support plans.

Instruction High-Leverage Practices

11. Identify and prioritize long- and short-term learning goals.
12. Systematically design instruction toward a specific learning goal.
13. Adapt curriculum tasks and materials for specific learning goals.
14. Teach cognitive and metacognitive strategies to support learning and independence.
15. Provide scaffolded supports.
16. Use explicit instruction.

17. Use flexible grouping.
18. Use strategies to promote active student engagement.
19. Use assistive and instructional technologies.
20. Teach students to maintain and generalize new learning across time and settings.
21. Provide intensive instruction.
22. Provide positive and constructive feedback to guide students' learning and behavior. (CEC & CEEDAR, 2017).

In referencing EBPs or HLPs, this research focuses on those which are both specific practices within larger programs such as leadership, instructional techniques, and curriculum and are also strategies for professional development, and accountability policies (Cook & Cook, 2011). EBP and HLP refer to practices in which demonstrated excellence in instruction, leadership, assessment or special education strategies and services promotes learning outcomes (CEC and CEEDAR, 2017; Cook, Tankersley, & Landrum, 2009)

Billingsley, Bettini and Jones (2019) discussed the impact that EBPs and HLPs may have in improving special education instructional effectiveness. They stated that by using EBPs and HLPs, schools and districts are able to establish protocols to promote effective instruction. Practices including professional development and mentoring, teacher evaluation, and collaboration, as well as teaching conditions which include collaborative instruction, instructional curricula and resources, and schedules that support special education teacher growth and development, have a positive impact on student progress (Billingsley et al., 2019).

School Choice and School Vouchers

Prior to the inception of IDEA in 1975, Milton Friedman (1955, 1962) introduced the school choice concept, advocating that a market approach to education could lead to overall improvements in educational quality and effectiveness. In the 1950's and 1960's, Friedman advocated strategies for less government involvement in education through the disbursement of educational vouchers to be used at an assortment of public, private or religious educational institutions. Friedman wanted to increase competition among schools to create a more efficient educational system which he believed would result in maximizing student performance and decrease government interaction in the operation of schools (Friedman, 1962).

One approach to educational choice is a school voucher system. Tang (2018) presents the two main arguments made by voucher proponents. Tang states there are two theoretical themes which advocates in favor of private school vouchers: liberty and educational opportunity. In line with the theme of liberty, Tang references that the Supreme Court recognized the rights of parents who wish to "direct the upbringing and education of children under their control" (MacGuidwin & Narayananthe, 2015; *Pierce v. Society of Sisters*, 1925). Tang also describes a resolution titled "Resolution Urging Congress to Pass Comprehensive School Choice Proposal" that was drafted by the American Legislative Exchange Council (2017). This resolution urged Congress to increase its support for education choice through education savings plans on the grounds that it is the "fundamental right of a parent to direct the upbringing, education, and care of his or her child" (American Legislative Exchange Council, 2017). The second theme in support of school vouchers is the "what's best for kids" argument for educational opportunity. This stance supports educational choice based on the idea that a private school may provide a

higher quality education because the parent has the ability to choose a school which better matches their child's individual needs (Tang, 2018). Referencing Friedman's theory of creating a competitive educational system, Tang presented the educational opportunity argument that the use of vouchers will increase competition and therefore increase performance of all schools.

Tang made a point of considering differences between the two pro-educational choice arguments. He stated that the liberty argument is absolute and considered a success simply through its implementation because it promotes parental and student educational freedom. The validity of the educational opportunity argument, however, is contingent on whether students actually perform better in the private schools they choose. Specific to students with IDDs, this educational opportunity argument would be valid only if one assumes that the private educational market offers a higher caliber of educational services than the public system. Since no government oversight holds private schools to a level of accountability to demonstrate improved outcomes for students, there are no objective measures to determine whether the voucher system provides a competitive market. There is also the risk that private entities could receive state dollars without providing high quality education or competitive services.

A literature search was conducted to investigate accountability in school voucher programs in states other than Florida. Research in these programs continues to shed concern on the effectiveness and accountability of private school choice programs, yet in addition to Florida, school voucher programs have also been implemented in Arkansas, Florida, Georgia, Indiana, Louisiana, Ohio, Oklahoma, Utah, Mississippi, North Carolina, and Wisconsin. In addition, as of 2019 there were 22 voucher programs which were tied to tax credit scholarship programs (United States Government Accountability Office Report (2019). According to this report, all scholarship

granting organizations were required to register with the state department of education offices. The largest state programs include Arizona, Florida and Pennsylvania. Of these three programs, this report indicates that, while there are criteria for fiscal responsibility and assurance of compliance to state requirements, only Florida was identified as being required to report aggregate test scores for tax credit scholarships (U.S.G.A.O., 2019). The Gardiner Scholarship in Florida also requires standardized assessment, however students with Intellectual Disabilities may declare a waiver from this assessment. Other than fiscal responsibilities, there were no indicators of accountability which were tied to student progress.

The Individual Commission of the States (2017) produces a state profile for voucher programs. It outlines voucher programs in fifteen states and identifies eleven programs in nine states for students with disabilities. These programs require students with disabilities to have an identified disability and an IEP to enroll in the scholarship programs. Five states' programs do not require an assessment, although participating schools may be required to provide parents with a periodic academic progress report. Maine requires that the governing bodies of the school district and private school collaborate to form a joint committee to select teachers, set teacher salaries, arrange a course of study, supervise instruction, and oversee other educational activities. The Education Commission of the States indicates that the superintendent of the Maine school district in which the private school is located should participate in this committee.

In Louisiana, students who participate in the special education voucher program must have a qualifying disability and an IEP or service plan which has been created by the private school that clearly identifies the services which the school will provide and how they will be provided. They must also only offer special education services to students needing those services

if the school already provides them and has done so with appropriately credentialed teachers for at least two years prior. Private schools in Louisiana may partner with a local school system to provide special education services. The private school must have been open and providing educational services to students with defined disabilities for at least two years prior to participating in the program and teachers must have appropriate special education certification or training. States vary in their oversite with most stating that teacher credentialing must include four year degrees or certification and students must be included in annual state assessments. Some states such as Indiana require private school scholarship participants to maintain accreditation by state or regional agencies.

Van Dunk and Dickman (2002) interviewed and surveyed key stakeholders in school choice programs including parents, administrators, and teachers pertaining to the Milwaukee School Choice Programs in Wisconsin. Milwaukee school choice demonstrated agreement that the validity of the program will be indicated by parent support and that schools will close if parents do not support them. Researchers noted that the intent in school choice was to promote a shift from governmental accountability and movement toward parent accountability. Van Dunk and Dickman stated that parents should be empowered so that they may select schools based on information they are able to obtain and determine best meet their student needs. This supports the idea that if schools are successful in meeting parent needs, they will succeed, and others will not. The authors of this research determined a lack of information which parents are provided. This information is critical for parents to make an informed school choice. The evidence suggests that most schools do not provide parents adequate information to make informed decisions. This finding supports the desire of this study to provide a resource for stakeholders to differentiate

schools which service students with IDDs and which implement accountability measures and best practices. Ohio requires students in low-income and special needs scholarship programs to participate in state assessments and requires special education students to have a maintained IEP. Wisconsin maintains attendance requirements as well as a percentage of students must demonstrate student progress in private schools accepting voucher students for low income families, however there are no progress requirements in Wisconsin associates with students who receive special education scholarships (Education Commission of the States, 2017).

Research continues to portray a consistent lack of accountability and asserts that there are few accountability standards tied to school choice. This literature review was unable to discern any states which tie accountability measures to the receipt of state funds. Again, state voucher participatory measurements reflected financial and operational standards and do not consider student achievement as a criterion for continued funding. Fiscal responsibility has been identified as a common participation requirement but there are minimal identifying standards to specify how that responsibility will be determined.

Florida private schools are regulated by state health and safety standards, but no regulations pertain to curriculum or operation. Legislators wanted the Florida Department of Education (FLDOE) to maintain regulation of state funds in providing educational vouchers, and private schools accepting the funds were concerned about FLDOE control. To provide funding for families to be able to seek alternative educational options, Florida created a scholarship program which partnered private schools with the FLDOE. The Florida state voucher program, originally named the "Scholarships to public or private school of choice for students with

disabilities" was developed in 1999 and renamed the John M. McKay Scholarship for Students with Disabilities Program in 2001 (McKay Coalition, 2020).

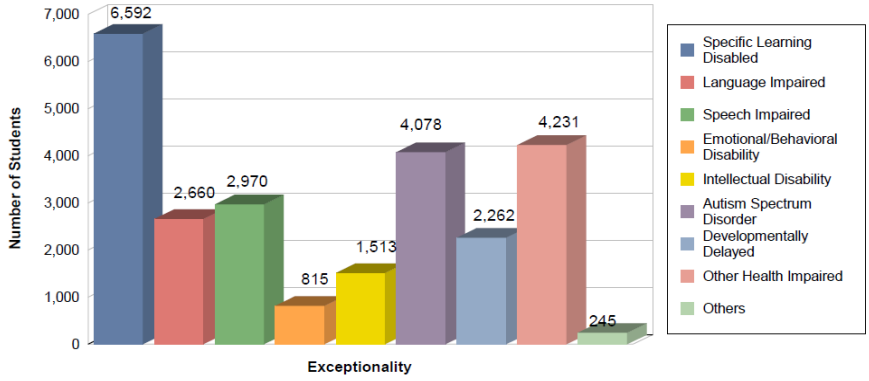
The John M. McKay Scholarship Program was initiated in Florida in 2001 as a response to the desire for school choice for students with a diagnosed disability. Following Friedman's market approach, the McKay Scholarship was initiated to promote competition among schools that provide services for this specific student population. To be eligible to receive these funds, students need to be identified with a disability and have an IEP that was developed during the student's enrollment in a Florida public school program during the prior academic year. Exemptions to these requirements consider military families and students who live in foster families. In addition to the McKay Scholarship, the state of Florida also brought into legislation the Andy Gardiner Scholarship, originally known as the Personal Learning Scholarship Account (PLSA). This scholarship is available to students who do not meet the one year Florida public school enrollment criteria, have a diagnosis reflected by the Agency of Persons with Disabilities and whose parents wish to homeschool or enroll in a private school which accepts state voucher funds. The school must have physical location in the state of Florida where students attend classes regularly and must notify the FLDOE of their intent to participate. Prior to participation a school must be in operation for a minimum of three years and file a surety bond or letter of credit for the amount equal to the scholarship funds for any quarter. They must agree to comply with the anti-discrimination provisions of which prohibits "exclusion from participation in, denial of benefits of, and discrimination under federally assisted programs on ground of race, color, or national origin" (Prohibition Against Exclusion, 1964).

While school choice programs pendulate in various states, impacted by changes in

political terrain, Florida continues to expand parent choice for students with disabilities. In the academic year 2018-2019, 30,695 students utilized the McKay Scholarship (Florida Department of Education, 2019). These numbers include students with all disabilities, not just significant cognitive or developmental disabilities; however, they illustrate the desire of parents to have a choice in educational placement and programs. This choice removes decisions about LRE and assessment from the district and places them with the parent. In the 2018-2019 school year, 1,525 Florida private schools enrolled students in the McKay voucher program, for a total state expenditure of 219.7 million dollars. Of those 30,695 students, 3,785 were diagnosed with IDDs, and they are the focus of this study (Florida Department of Education, 2019a).

Figure 2.2.

IEP Student Enrollment by Primary Exceptionality

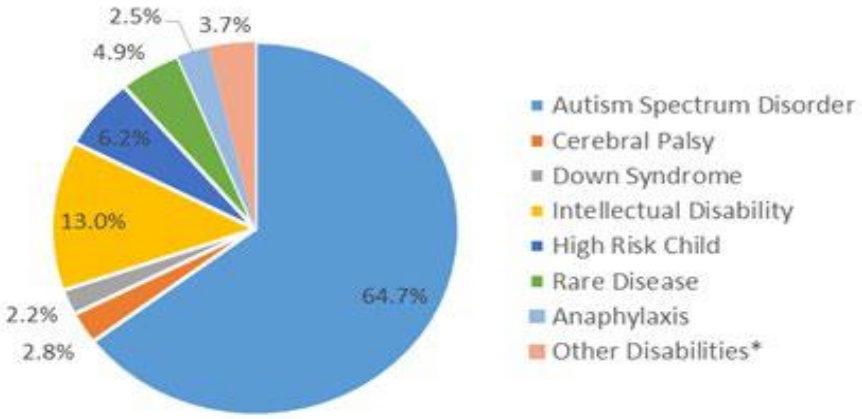


PRIMARY EXCEPTIONALITY	STUDENTS	PERCENTAGE
Specific Learning Disabled	6,592	26.0%
Language Impaired	2,660	10.5%
Speech Impaired	2,970	11.7%
Emotional/Behavioral Disability	815	3.2%
Intellectual Disability	1,513	6.0%
Autism Spectrum Disorder	4,078	16.1%
Developmentally Delayed	2,262	8.9%
Other Health Impaired	4,231	16.7%
Others	245	1.0%
Total:	**25,366**	**100.0%**

Source: Florida Department of Education, 2019a

Additionally, 12,188 students with disabilities were enrolled in the Gardiner Scholarship, with another 125.1 million dollars allocated to private school special education or home school educational choice (Florida Department of Education, 2019b). To be eligible for the Gardiner Scholarship, a student must have a diagnosis of one of the following disabilities: autism spectrum disorder; muscular dystrophy; cerebral palsy; Down syndrome; Phelan-McDermid syndrome; Prader-Willi syndrome; spina bifida; Williams syndrome; intellectual disability (severe cognitive impairment); rare diseases as defined by the National Organization for Rare Disorders; anaphylaxis; deaf; visually impaired; dual sensory impaired; traumatic brain injured; hospital- or home-bound as defined by the rules of the State Board of Education and evidenced by reports from local school districts; or three-, four- or five-year-olds who are deemed high-risk due to developmental delays (Florida Statute 393.063).

Figure 2.3 Gardiner Students by Disability



Note:* Other disabilities include Prader-Willi syndrome, spina bifida, Williams syndrome, muscular dystrophy, Phelan-McDermid syndrome, deaf, and certain other disabilities.

Source: Florida Department of Education, 2019b

The McKay program has grown from 6 students in 1999 to 31,695 in 2019 (Florida Department of Education, 2019a). Despite this growth, little research has been conducted regarding parent satisfaction (Black, 2015). Black's research included a review of surveys conducted in 2004 indicating that parents who took advantage of the McKay Scholarship believed that their students were in smaller classes and were less victimized because of their disability, and they were very satisfied with the schools they had chosen for their student. Seventy percent of parents reported they paid no more than the scholarship allotted or that the additional fees were less than $1000 (Greene & Forrester, 2003, as cited in Black, 2015). Additional surveys indicated that parents of students with disabilities who moved their children to private schools were more satisfied and better informed than they were in the public school setting (Lewis, 2005, as cited in Black, 2015). (It should be noted that all studies which reported parent satisfaction of the McKay Scholarship program did not take into consideration the satisfaction of parents who chose to continue enrollment in a public education placement.) Recognizing that a full evaluation of the effectiveness of the McKay program would require surveying parents in public schools to determine their level of satisfaction with academic and supplemental services, Black sought to augment Greene and Forrester's data with additional results. Black surveyed parents who took advantage of the McKay Scholarship in public, private and not-for-profit schools. A total of 210 parents were forwarded the survey with 68 responses received for a response rate of 31.05%. The survey asked parents to respond regarding satisfaction with child's school, that student needs are met, with school administration and with the physical condition of the school. Additional questions focused on parent involvement, student social engagement, transportation concerns, and additional costs above what the McKay

Scholarship covered toward tuition and expenses. Black's results confirmed previous studies which reported that parents whose students were enrolled in private schools under the McKay program were satisfied with the choice and arrangements their student's educational programs provided, regardless of having to pay for some services out of pocket or others being unavailable (Black, 2015). His study also identified the need for further research on whether the funds were appropriately utilized for the intended reasons the voucher identifies. While additional data on student outcomes would help identify whether state dollars are effectively utilized, parent and state objectives may differ along with their assessment of effectiveness with students who are diagnosed as IDD.

Regulatory Framework

Policy is an important catalyst in change. Change in policy has driven special education equality and the inclusion of students with disabilities in LRE (Individuals with Disabilities Education Act, 1997). Without written policy, efforts to promote change and improve educational practices are left to state discretion (Roach et al., 2002). Without policy and review of the effectiveness of that policy, there is no cogent means to determine whether educational programs are having the intended outcomes. Private school special education programs in Florida do not fall under the guidelines of federal or state policy. In Florida, a private school is defined as "an individual, association, co-partnership, or corporation or department, division, or section of such organizations, that designates itself as an educational center that includes kindergarten or a higher grade" (in Section 1002.01(2), Florida Statutes). Additional Florida policy allows private schools to utilize state and federal funds to provide educational programs to students who have been identified as having disabilities. These state voucher programs are

supported through legislature known as the John McKay and Andy Gardiner Scholarship Programs. While inclusive special education and best practice policies are mandated in public schools by federal law (Individuals with Disabilities Education Improvement Act, 2004), private schools that accept these two scholarship programs are not obligated under Florida law to adhere to these same policies or practices (Individuals with Disabilities Education Improvement Act, 2004, Part B, Subchapter 1412 (10)(A)(l)). IDEA Part B places the ownership of these policies in the hands of private local agencies which distribute proportionate shares to eligible non-profit private schools.

State and federal law require that, once every three years, district school boards submit to the state Department of Education proposed procedures for the provision of special instruction and services for students with disabilities (Florida Statute, Section 1003.57(1)(b)4)). The procedures proposed by the district also serve as the "basis for the identification, evaluation, eligibility determination, and placement of students to receive exceptional education services, and is a component of the district's application for funds available under the IDEA" (Individuals with Disabilities Education Act, 2004, Subchapter 1414). There is no such procedural disclosure to demonstrate quality instruction and services required from private schools serving students with disabilities.

Public education requires each district and school to complete an assessment of best practices for inclusive education (BPIE) every three years. This assessment also includes proposed renovations to the district's policies and procedures in response to the BPIE evaluation. BPIE was designed to be an internal program assessment to promote the evaluation and improvement of inclusive educational practices at the district and school team levels (Florida

Statute §1003.57(1)(a)4(f). There are no current evaluative practices by local or state education agencies which require private schools serving students with disabilities to assess their program effectiveness.

Without oversight by the state Department of Education or an accrediting body, private schools are left to their own resources to determine placement, curriculum, IEP development and even graduation requirements. Though private schools are not legally bound to follow the regulations set forth in IDEA, it could be argued that those accepting state funds through school choice programs have a moral obligation to offer students a high quality education with access to appropriate curriculum in an environment the parent has deemed most appropriate for their child. The study of accountability in private school special education and the use of vouchers as a parent option to educate their student with disabilities outside of a public institution elicits emotional reactions regarding the rights of students who would otherwise be under the protection of IDEA (Black, 2015; Bon, Decker, & Strassfeld, 2016). These reactions are opposing groups: those who believe that vouchers stray from a centralized education, diverting funding away from public programs for students with disabilities and those who believe that the public education system is not providing all students the protection and services that are outlined in IDEA. One must remember that the use of vouchers is a parental decision. While parents should have full knowledge regarding both benefits and possible repercussions when choosing a voucher option, many are unaware of their loss of rights to due process under IDEA (Bon et al., 2016).

Accountability

It is not enough to implement policy that allows for the right of education for all children with disabilities unless there are stipulations which bring standards of quality and progress as a

result of that education. The need to improve the results of education for children with disabilities is the foundational component which elicits "equality of opportunity, full participation, independent living, and economic self-sufficiency for individuals with disabilities" (Individuals with Disabilities Education Act § 20 U.S.C. 1400(c)(1)). Voucher-receiving private institutions are not required to adhere to IDEA and thus lack the same accountability required from public schools (Bon, Decker & Strassfeld, 2016). Specifically, many special education voucher programs do not require the administration of standardized testing, the employment of credentialed teachers, or that students with disabilities be provided an IEP (Bon et al., 2016, as cited in Hensel, 2010).

A push for educational data began the accountability movement (Lessinger, 1970). Lessinger states that accountability should be viewed as a process whereby an agency, public or private, "who enters into a contractual agreement to perform a service will be held answerable in the agreed upon terms" with the desired educational results a critical component of the agreement (Lessinger, 1970, p. 217). Lessinger refers to one method of accountability as the performance contract, stating that this method assures quality and knowledge of results (p. 217). He defines this method of accountability as a public authority contracting with a private enterprise to achieve specific goals. Lessinger defines accountability as a "product of the process" (p.217), meaning that an agent who enters into a contract will be "answerable to performing the agreed upon terms, within a specific time period and with specific standards and resources" (p. 217). Lessinger suggests that the contracted parties keep complete records and that the information be available for third party review. Referencing back to Lessinger's definition of accountability which states a public or private school enters into a "contractual agreement to

perform a service" and "will be held answerable in the agreed upon terms", he explains further that the desired educational results are a critical component of the agreement (Lessinger, 1970, p. 217). Lessinger states that accountability without redress or incentive is mere rhetoric (p. 217). It is important to note that Lessinger did not state that a private school is exempt from accountability just because it is not governed by the state legislature. Rather, private schools that accept state vouchers should assume responsibility for the student with disabilities as though they were contracted through the state scholarship. The recommendations from this study help identify whether a school is meeting desired educational results as identified by experts in private school special education provide educational services to students with IDDs.

Unlike Lessinger's model, private schools accepting state vouchers to provide academic programs and services for students with disabilities, do not meet the criteria of a performance agreement because the contracting party does not require measurable objectives and the resources to meet those objectives. Florida public schools assess student performance annually using the Florida Standards Assessment (FSA) and the Florida Standards Alternative Assessment (FSAA) for students with the most significant cognitive disabilities (Florida Department of Education, 2017). FLDOE defines two components of the FSAA program to allow for comprehensive assessment: the FSAA-Performance Task (FSAA-PT) and FSAA-Datafolio. The FSAA-PT assesses students at three levels of difficulty and results are reported through achievement levels. The FSAA-Datafolio is designed specifically for students who do not have a formal communication method and may be working at pre-academic levels. Private schools which accept state vouchers are not required to participate in the FSA/FSAA but are required to administer or make provisions for students to participate in a FLDOE-approved norm-referenced

assessment if the parents so choose and are responsible for reporting scores to the Learning Systems Institute (LSI) at Florida State University (Florida Department of Education, 2019c). Florida state statutes outline that students with significant cognitive disabilities whose IEP team has agreed that standardized assessments will not accurately reflect student abilities (Section 1008.212, F.S) shall have the results from the assessment waived for the purposes of receiving a course grade and high school diploma (1008.22(6)(c)2 F.S.).

FLDOE requires that private schools provide at least quarterly reports of student progress to parents. While private schools accepting the Tax Credit Scholarship, which supports low income students, must report student data to the LSI annually, schools serving students under the Gardiner Scholarship are instructed to report student scores to the parents and not to the LSI. This search was unable to locate an accountability measure for assuring reporting of assessment results to the LSI. With regard to students on the McKay Scholarship, the FLDOE states that private schools must "be academically accountable to the parent for meeting the educational needs of the student by providing a written explanation to the parent of the student's progress annually and cooperating with parents who choose to have the student participate in statewide assessments" (Florida Department of Education, 2019d, para.6). A search for regulations which hold private schools accountable to practice educational standards with measurable objectives, data driven instruction or adherence to EBP data to track progress of students with significant intellectual differences turned up no results.

Although accountability criteria for a private school to participate in a Florida voucher program, including the McKay and Gardiner Scholarships do not include educational standards or measurable objectives, they do include the following. Participating schools must agree to

employ or contract only teachers who are degreed at a minimum of a bachelor's level or have a minimum of three years teaching experience in public or private schools, or hold special skills, knowledge, or expertise that qualifies them to provide instruction in subjects taught. Schools must submit a signed and notarized Scholarship Compliance Form which certifies that all school employees and contracted personnel with direct student contact have undergone the required background screening, and that they meet state and local health, safety, and welfare laws, codes, and rules. Scholarship checks are sent to the school of the enrolled student but require parent endorsement each quarter. Institutions must document quarterly attendance and must pass and submit proof of annual fire code and health inspections. All personnel having contact with students must undergo Florida Department of Law Enforcement fingerprint and background screening prior to employment. All schools must adopt standards of ethical conduct, including the training of all staff on ethical conduct and child abuse, welfare, and safety. These adopted standards must be posted on the schools' websites.

Private schools receiving state funds must also "be aware of program deadlines, respond to requests for information from the department, notify the department of changes in ownership or leadership, maintain contact on the FLDOE website, return any funds received for services that were not provided, and complete the annual survey and compliance forms" (Private Schools, 2019; Private School Scholarship Compliance, 2018). Other than attendance and teacher qualifications, the requirements for a private school to qualify to receive state funds have little to do with student success. Additional requirements for private schools which are voucher recipients include: provision of instruction for a minimum of 170 actual school instruction days meeting the required hours determined by the state board (Equivalent Minimum School Term,

1980) at the school's physical location; provision of an annual written explanation of student progress to the parent; compliance with all state laws that regulate private schools; timely withdrawal of a student from the program and notification to the Department upon parent request; and administration of a combined 15 academic instructional hours on school site and 10 work skills training hours for students enrolled in the transition to work program.

These requirements indirectly address academic reporting to parents and sustained programming to allow for student progress. There are no references to standards nor to the protections provided by the revised federal IDEA law, including the development of an IEP.

Measuring Adequate Student Progress

Recognizing the needs to increase accountability and to better measure learning outcomes for students with disabilities, the Office of Special Education devised a system called Results Driven Accountability (Office of Special Education, 2016). This system was intended to provide a transition state for compliance with IDEA with an emphasis on measurement of student results. States submit their plans for how federal grant money will be used to implement practices which align with their individual interpretations of federal regulations. As always, when there is the ability to interpret compliance based on the state's best interest, there is a risk that compliance takes priority over educational standards that result in student gains (Musgrove, 2017). Each state is required to submit a state performance plan/annual performance report (SPP/APR) which identifies how the state implements the requirements of IDEA and how it will make improvements to its implementation. These implementations should demonstrate how compliance with IDEA are to be measured. This information, along with information from monitoring visits, is used by the Office of Special Education to determine if the state's public

school programs meet the intended purposes of IDEA, need assistance in implementing the requirements specific to Part B or Part C of IDEA, or need to intervention in their implementation of the requirements (State Performance Plan and Annual Performance Report, 2020).

While IDEA is a federal law which applies to all eligible children with disabilities, those enrolled by their parents in private schools are considered "parentally placed private school children" with disabilities. While the benefits to them may differ, IDEA was intended to improve educational results for all children with disabilities. The Every Student Succeeds Act (2015) outlines federal support of students with disabilities who are placed in private schools. Regardless of a parent decision to utilize school choice in a private school setting, the law requires state education agencies (SEAs) and local education agencies (LEAs) to ensure the implementation of ESSA equitable service requirements to students with disabilities in private schools, through the receipt of proportionate shares (Duncan, Shelton & Dowling, 2011). LEAs are not required to offer individual services, rather a proportionate share of IDEA funds is required to be made available to private schools to allow for the provision of equitable services. To ensure accountability of those funds, the LEA must establish an understanding of eligible services and approved expenditure of proportionate shares to support students with disabilities. The amount and type of services are determined by consultation of the LEA with representatives from private schools. There is no assurance that all services identified on a student's public school IEP may be available to them in the private school placement. If services are provided through proportionate share funds, service plan progress for each student is reflected annually through updated objectives discussed in a service plan meeting with families, the private school

and the LEA(612(a)(10)(A). Proportionate share funds should not be used to benefit a private school (Code of Federal Regulations Title 34 CFR §300.141) but to acquire materials specific to the needs of individual students with disabilities.

Historically, NCLB has been implemented such that student progress is measured through alternate state assessments that are administered to a small percentage of students with severe cognitive disabilities who are not able to participate in the regular assessment even with the provision of accommodations. While the regulation allows for this exception, the law provides no definition of what qualifies a student as significantly cognitively delayed, but it permits the state flexibility in deciding who will take the alternate assessment. ESSA, signed in 2015, reduces the federal role in education accountability, withdrawing many of the requirements set forth by NCLB. ESSA gives states greater individuality in designing their own accountability systems, requiring them to "establish student performance goals, hold schools accountable for student achievement, and include a broader measure of student performance in their accountability systems beyond test scores" (Association for Supervision and Curriculum Development, 2016). ESSA continues to support individual student accountability with the utilization of Alternate Assessments Aligned with Alternate Achievement Standards (Every Student Succeeds Act Assessment Fact Sheet, 2015).

Some states have decided to develop an individual student portfolio in lieu of an alternative assessment (Elliott & Roach, 2007 and Katsiyannis, Zhang, Ryan, & Jones, 2007 as cited in Stockall & Smith, 2013)). These collections of student work should reflect the content standards in the general curriculum and should also be evidence based. Stockall and Smith (2013) interviewed teachers to investigate student portfolios as a qualitative assessment of the

progress of special needs students in a public school which was nationally recognized for excellence in teaching. Twelve portfolios of students with significant intellectual disabilities were selected because school administrators had identified them as models of standards-based alternative assessments. The portfolios were rated as meeting the standards for adequate yearly progress. Participants in the study agreed that the portfolios were useful in making both teachers and students accountable and a valid means of demonstrating student progress, supporting outlined objectives in the student IEP. Special education teachers of students with intellectual disabilities agree on the need for creative ways to illustrate mastery of skills including pictures and videos of the student demonstrating the task. Portfolios should be individually developed to assess the progress of students with disabilities using the same standards as those used in GE (Browder et al. 2003).

While the use of alternative assessment measures like portfolios allows schools to count children with severe disabilities as meeting target objectives to signify progress, Stockall and Smith (2013) raised the question of whether these alternative measurements reflect actual mastery of a skill. They note that when content is modified to meet extreme needs, then the progress of those students can no longer be compared to the progress of students in GE classrooms and the assessment results are misleading to parents and politicians (Stockall and Smith, 2013). Regardless of measurement of student progress, however, the educational program must "meet the individual needs of the student to become independent and autonomous members of the community" (Kaufman, 2005).

Private schools serving students with disabilities have the ability to choose their own measurements of student progress. Private schools could utilize state assessments, other state

accepted standardized assessments, portfolios or IEP development accompanied with a student portfolio to demonstrate progress toward identified educational goals and objectives. These measurements of student progress substantiate the validity of the education being provided through school choice programs.

Parental Choice of Private Schools

Appropriate placement and IEP decisions should not have to reach a court level. The ruling in *Rowley* outlined that the IEP process should ensure that parents and school representatives equally express their respective opinions on the degree of progress a child's IEP should pursue (§1414, §1415; *Rowley*, 458 U. S., at 208–209). When agreement is not reached, IDEA allows for parents of students with disabilities in public school to access due process, where the judicial system will provide mediation. IDEA law is clear regarding the utilization of "special classes, separate schools, or other removal of children with disabilities from the regular educational environment" as a placement which should only occur if the child's disability is such that regular classroom placement would not achieve satisfactory results (United States Department of Education, 2000, Deciding Placement, para. 3). In states where school choice is a placement option, parents, who are integral members of the IEP team, may determine that their student's education is not being achieved and opt for an educational voucher for a private school. The National Council on Disabilities published School Choice Series: Choice & Vouchers—Implications for Students with Disabilities (2018b, p. 41) which identified these non-academic reasons why parents opted to leave the public school and the protection of IDEA:

- more involvement and control in decisions about their child's education;
- being included and respect for parental involvement in the IEP team;

- better special education services and willingness to implement individualized education programs (IEPs), including opportunities for direct instruction and research-based interventions;
- safer schools, including schools with no bullying;
- higher expectations for students with disabilities;
- hope that children with disabilities would perform better academically, socially, or behaviorally in a different setting or better school;
- opportunity to match educational options with family lifestyle such as religious reasoning.

Research cited in the NCD report showed that many public school parents who decided to use vouchers felt the powers and protections under IDEA and associated regulations that their student theoretically has, were not a reality for them. Many declared they were tired of fighting a school district over their child's education and they did not have the time, money or knowledge to continue to fight. The focus group of parents in the NCD study indicated that parents believed their child was not receiving the support or services that were indicated in a student's IEP and they were turning to the voucher system in search of better services (National Council on Disability, School Choice Series, 2018).

Parents often leave the public schools out of frustration but are unaware that there is limited protection and accountability in the private sector. In Florida, the McKay and Gardiner Scholarships allow parents to make a unilateral decision that a private school which serves students with intellectual disabilities is a less restrictive environment for their child. However, such a school offers the student greater opportunity and fewer restrictions only if the private

school offers appropriate curriculum, programs, and services to support students with these significant special needs.

The Role of School Leadership

HLPs have the potential to facilitate teacher growth and support effective instructional practices. These practices will only be successful if the educational environment supports the use of these practices. Hoppey and McLeskey (2014) divided best practices characteristics into cultural, organizational, and instructional qualities. They identified the cultural and organizational qualities which guide toward a successful inclusive environment as: a unifying vision; support for collaboration, shared decision making, and distributed leadership; a focus on becoming a data-informed problem-solving organization; and efficient and flexible use of resources. These practices are leadership driven and set the culture for the use of both EBPs and HLPs. It seems likely that leadership which drives these practices in private school special education programs will facilitate effective student progress.

Hoppey and McLeskey (2014) and Black-Hawkins et al. (2007) emphasized the critical role of leadership in developing the vision which shapes school culture and builds a collaborative effort to achieve that vision. Without a vision to increase school programming which aligns with the protective standards of IDEA, private schools may function with no oversight or accountability for student progress, all while operating with federal and state dollars which would have supported that student in a public school placement. While there is a distinction between formal compliance with the same federal guidelines imposed on the public education system, voluntary implementation of EBPs which align with the educational rights of students with disabilities would be a valuable move toward developing accountability standards which

show appropriate use of state funds. Private school administration must take steps to implement formal requirements of appropriate curriculum, alternate means of assessment to measure academic and social/emotional progress, opportunities for teachers to attend and implement professional development seminars on elements of high quality instruction, and the development of IEPs to identify the specific needs of each student and the supports that will help them to attain these objectives.

Hoppey, Black and Mickelson (2018) noted that successful, inclusive schools make decisions using data combined with innovation which is responsive to student needs, rather than assuming that students learn and demonstrate knowledge in the same ways. To develop individualized instructional techniques, administration must provide time for professional coaching, professional learning communities and study groups so that teachers may learn how to implement HLPs and EBPs while also developing leadership skills (Billingsley, 2012; Salisbury, 2006; Spillane, 2006 as cited in Hoppey et. al, 2018). These skills are imperative so that teachers have adequate time to solve problems and apply their knowledge to student progress. The authors reference additional research by Black-Hawkins et al. (2007), and Hoppey & McLeskey (2014), who concur that leadership is key in defining the emphasis and culture of special education within educational institutions. Teachers must be provided with adequate planning, instructional and professional development time to allow for skill development focused on differentiated learning. If this teacher development and planning is not prioritized by leadership, teachers will be unable to develop and apply strategies which will increase student learning. To most efficiently provide the time, materials, training and effective people necessary to support

special education programs which instruct students with intellectual disabilities, leadership must creatively distribute the resources which are allocated to them.

In Florida, state scholarship programs for students with disabilities and proportional share dollars for privately placed students support a private school's ability to provide high quality educational services. However, effective management of these resources requires flexible personnel roles and adequate professional development to support responsibilities (Black-Hawkins et al., 2007; Florian, 2012; Hoppey & McLeskey, 2014). Marzano, Warrick and Simms (2014) discussed teacher teams and collaborative group meetings as a means of addressing common issues which occur with curriculum, assessment, instruction and achievement. Team leaders serve to steer grade level discussions and problem solving. These discussions must have critical commitment from administrators and team leaders in order to schedule time to effectively address common issues which are more easily alleviated by teams than by individuals.

Chapter Summary

With a history of less than 50 years, special education has developed from institutionalized placement intended to separate students with intellectual disabilities to inclusion in GE classrooms. While the social intent of past institutional placement should be recognized, it should not be used as a comparison to identify private school as a more restrictive placement when considering parental placement in specialized private schools today. The adoption of federal law codified the incipient cultural change and mandated the inclusion of students with special needs in educational programs.

Each state has strived to adopt and implement federal guidelines as codified in IDEA. For students with IDDs, the public school options for LRE may be in opposition to the parent's

educational desires for their child. The growth of school choice and state scholarships for students with significant intellectual disabilities allows parents to determine if their student will receive a public school or a separate private school education. School choice and educational choice programs continue to grow in Florida, allowing parents to exercise their choice of placement for students with disabilities. The independence of the private school allows for parents to determine instructional priorities for their student, however when that instruction is provided through the use of state or federal dollars, private schools have an obligation to the families and the state to demonstrate fiscal and professional responsibility that students are receiving a results-driven education.

CHAPTER 3: METHODOLOGY

A qualitative approach was chosen because it was judged to allow the greatest latitude in constructing understanding and the development of fundamental practices which could be used to evaluate student academic, social, and vocational gains, support teacher development and lend to accountability measures. Research identifies the use of evidence-based practices in special education programs (Cook, Tankersley, & Landrum, 2009), but there is a gap in research to support the use of evidence-based and high-leverage practices in private schools serving students with IDDs. The purpose of this research was to use a Delphi study (Helmer and Rescher, 1959) to interview a team of experts in private school special education to arrive at consensus about accountability measurements that could promote best practices standards.

Research Design

The Delphi panel method was used to collect information and insights from individuals with private school special education expertise, including administrators and teachers. The Delphi technique is recognized as beneficial in qualitative research that is exploratory in nature, in this case to build a foundation for further determination of policy. Dalkey and Helmer (1963) suggest applying the Delphi technique whenever policies and plans have to be based on informed judgment, and to some extent to any decision-making process.

The initial step in the Delphi process as outlined by Stewart and Shamdasami (1980) is to identify the issue surrounding the research to be addressed by the experts. The issues surrounding this study were poorly defined standards for both accountability measures and EBPs for special education private schools. A panel of experts discussed best practices for special

education as they are identified with students with IDDs. Qualitative data was collected through a Delphi method, analyzed using a thematic transcription approach and compared to literature.

The primary method of inquiry involved conducting individual, semi-structured video interviews. Interview questionnaires were developed that directed the interview conversation through twelve open ended questions. Following transcription, data was categorized by theme and re-presented to the panelists for determination of inclusion in recommended accountability measures or best practices. The ratings were scored to determine mean ranking and eliminate any practices which did not qualify for defined range of essential practices. All practices were categorized as accountability measures or essential practices and presented as a final submission of fundamental recommendations for accountability measure and best practices for private schools serving students with IDDs. Panelists submitted their agreement for the submission, reaching consensus on the final document.

Criteria, Recruitment and Selection of Participants

The Delphi panel was selected to include individuals who have expertise in the subject area. Determining selection criteria was an important step since the validity of the results is dependent on the competence and knowledge of panel members (Powell, 2003). The Delphi method allows some discretion in choosing the experts who were included in the study. Hsu and Sandford (2007) asserted that the subjects should be "highly trained and competent within the specialized area of knowledge related to the target issue". With regard to the number of panel members, some studies have fewer than 10 while others include more than 100. Hogarth (1978) believed the ideal panel was between six and twelve members. Most important, the composition should maximize expertise as it pertains to the research topic (Ziglio, 1996). Panelists were

identified as having significant affiliation to private schools that serve students with intellectual disabilities. This affiliation could be either instructional or administrative, and each participant was identified as either a practice and/or experiential expert. Practice experts were actively involved in the education of students with intellectual disabilities and they influenced school based decisions such as admissions criteria, curriculum, student measurement of progress, parent involvement, teacher credentials and professional development. Experiential experts had experience in the application of EBP and direct influence on their success in the support of teachers or students with intellectual disabilities (Petry, Maes, & Vlaskamp, 2007). Panelists were chosen from the state of Florida in order to limit participants to those whose schools accept state vouchers directed at students with disabilities. Ziglio (1996) have indicated that, when panel group members are analogous with similar expertise and backgrounds, it is possible to achieve reasonable and rational results with a small group of experts.

The conditions used to determine expertise of participants in the Delphi methodology included but were not be limited to at least four of the following criteria:

- Minimum of 5 years of experience working in special education.
- Minimum of 2 years working in a private school serving students with intellectual differences under a state voucher program.
- Demonstrated understanding of IDEA and school choice policies.
- Representative of various regions of Florida.
- Knowledgeable about IEP development and special education assessments.

Participants

The selected Delphi panel was limited to individuals with knowledge and expertise of special education in a private school setting. Their initial identification was based on the recommendation of leadership from state scholarship organizations who have knowledge of high quality special education private schools throughout Florida. Additional identification was determined through the Florida School Choice website (floridaschoolchoice.org) which identifies school leadership personnel and the student population that pertains to services which the private school can provide. This process resulted in the selection of nine different administrators who have served in both public education and currently hold leadership positions in the private school sector. Of the nine administrators invited to participate in the interview process, seven agreed and remained communicative to complete the study. Each of these participants met the Delphi criteria of "highly trained and competent within the specialized area of knowledge related to the target issue" (Hsu & Sandford, 2007, pg.3). While most Delphi panels have between six and 12 panelists, it is of value to note that the timing of this study fell during a pandemic in which school administrators, both public and private, were restructuring their academic programs and were unable to commit to participation in a study at this time. Additional panel members would have expanded the expert base of knowledge and experience to provide greater consensus, however this team of seven experts emulated consistency in their responses and were able to develop strong guidelines and agreement on the recommended standards.

The seven identified participants had reported expertise and affiliation with private school institutions serving students with IDDs. This affiliation was identified either as experiential with a history of instructional experience or practice experts who are actively

involved in the educational practices of students and directly influence their success through the support of teachers and program development. All panelists had served in an administrative role and were geographically located throughout the state of Florida, inclusive of institutions serving students with a variety of IDDs. Participants (Table 3.1) included two special educators who are also parents of students with disabilities and began a private school to support their child's needs; one educator/administrator with a special needs grandson; one administrator had experience in a general education private school and saw a community need for increased special education in private schools; one administrator with district assistant superintendent experience; one administrator with experience as a public school principal overseeing special education programming and now state scholarship management; and one administrator who has held a private school special education leadership role for over 15 years. All have held administrative roles and had decision making capacity in either a public or private school setting.

Table 3.1.

Demographics of Study Participants

Characteristics Variable	**Response**	**Count (N=7)**	**%**
Age	36-45	0	0
	46-55	1	14.3
	56-65	6	85.7
Highest Level of Education	Bachelor's Degree	2	28.6
	Master's Degree	4	57.1
	Educational Specialist	1	14.3
	Doctorate	0	0
Years in Administration	5	1	14.3

	More than 5 Less than 10	1	14.3
	> 10	5	71.4
Professional Background	General Education	0	0
	Special Education	4	57.1
	General and Special Education	3	42.9
Setting	Private School	1	14.3
	Public School	0	0
	Both Public/ Private	6	85.7

Research Questions

The following questions were constructed to determine specific practices that experts in private school assure are utilized to support student academic, social and vocational progress and to support the development of teachers who are instructing these students.

From the perspective of experts in private schools for students with IDDs:

3. What evidence-based and high leverage practices are or should be implemented in private schools that educate students with disabilities?
4. What accountability measures are or should be in place in private schools that accept state funding to serve students with special needs?

Data Collection

Making use of data, knowledge, and experiences from identified experts in the field of special education allowed for comprehensive insight and group decision-making. Permission was requested from the Institutional Review Board (IRB) prior to initiating contact with the

participants or collecting data. All participants were provided with and signed a Confidentiality Agreement. The agreement described the plan for data collection, a description of data analysis and commitment from the participant. Participants were assured that all information was confidential and there would be no noted association by name or institution. In a group decision making process, there may be bias if strong personalities overpower those with less self-confidence, thus influencing the final decisions of the group as a whole. For this reason, confidentiality was maintained so that group members were unaware of the identity of the other experts.

Round One: Interviews

Interviews were conducted with structured, pre-determined questions but included probing questions to elicit detailed supporting information as needed. The questions were structured to result in a cultural description which identified fundamental standards of best practices that are utilized by various experts at their private schools. There was “deep reliance” on the informants’ extended responses to the interview questions to describe the work that is or should be taking place in their schools now and what they are striving to implement in the future (Merriam & Tisdell, 2015, p. 29). The interview questions are outlined in Appendix A and are applicable to programs which serve a student population who have IDDs.

Given the geographical distance between interviewees, interviews were conducted through virtual video. The interviews were audio recorded but the interviewer also noted emotion and facial expression observed with response to questions. Each interview was transcribed, and a description of the interview was provided to the participant for them to confirm accuracy of

transcription content. The individual descriptive analysis of the interview was provided to all panelists to allow for agreement of content.

Data Analysis

Analysis was conducted through Wolcott's three-prong method of description, analysis and interpretation (Wolcott, 1994). Wolcott refers to analysis as "the process of cautiously constructing studies out of data" (p. 174). While this was not a traditional ethnographic study supported by observation, attention to detail in the participant responses, intonation and emphasis of dialogue was considered in the analysis of interview responses. Interpretation of participant responses was considered an important strategy decision in transforming the data (Wolcott, 1994) since responses were impacted by participant's experiences and the value they placed on each of the questions discussed. There were no noted contradictions between verbal responses and other observed responses.

Recorded interviews were transcribed for detail and assessed for common themes. These themes determined components of practices which supported accountability and were consistently identified by experts on the panel. Themes were then analyzed to identify the panel's recommendations for accountability measures and best practices. Results were placed in Table 3.2 which listed all participant answers correlating to each question and were then re-submitted to the expert panel.

Round Two: Participant Scoring of Responses by Survey

This table was the second phase in obtaining expert responses to develop standards of accountability and practices. The same panel of experts were asked to rank each response in the data tables. All participant responses were categorized by question. Questions 1-5 were

organized into tables with a response scale of 0 if participants felt there was no accountability value in the answer provided; 1-2 to indicate there may or may not be accountability in the suggested recommendation but that it was not essential; or 3-4 to indicate the practice was a valid measurement of accountability. Questions 6-12 were organized into tables with a response scale of 0 if participants felt there was no value as a best practice in the recommendation; 1-2 to indicate there may or may not be values as a best practice in the recommendation but that it was not essential; and 3-5 to indicate an essential recommendation. This scoring gave the opportunity to place greater emphasis on practices that the participants valued more highly. The variation of scoring ranges in accountability measures (questions 1-5) versus best practices (questions 6-12) was utilized to assess the degree of value placed on the practice.

Table 3.2
Interview Data

Notes: Ranking Scale: 0=invalid accountability practice; 1-2=may or may not offer accountability; 3-4=essential accountability practice

What specific processes do you believe are important which exhibit accountability in special education? Do these measurements align with state accountability practices?	P1	P2	P3	P4	P5	P6	P7
Data Driven Assessment							
Admissions Process to Determine Appropriateness of Placement – Only Accept Students You Have the Ability to Serve							
Staff Background Checks							
Teacher Credentialing Standards for Degreed in Field of Special Education							
Teacher Credentialing Standards for Certification							
IEP Development							
Individual Knowledge of each Student Which is Supported by Data							
Consistency and Standardization of Processes Across Time							
Accreditation or Oversite by an Outside Agency							

Question 1: (0) Invalid Accountability Practice (1-2) May or May Not offer Accountability (3-4) Essential Accountability Practice

Question 2: (0) Invalid Accountability Practice (1-2) May or May Not offer Accountability (3-4) Essential Accountability Practice

How do school policies influence accountability in addressing the requirements of serving students with IDD and their families? Should accountability policies be implemented by the state for schools who access voucher funds for students with IDDs?	P1	P2	P3	P4	P5	P6	P7
Policies are Administered by the State							
Policies are Determined by a Board of Directors							
Policies are Set Specific to Student Population by School Administration							
Policies are Determined by Accreditation Requirements							
Policies are Influenced by What is Modeled in Other High Quality Schools							
Policy Includes Annual Visitation from the Department of Education							

Question 3: (0) Invalid Accountability Practice (1-2) May or May Not offer Accountability (3-4) Essential Accountability Practice

Are there other considerations which have been, or should be, influential in shaping accountability in private schools serving students with IDDs?	P1	P2	P3	P4	P5	P6	P7
Accreditation Requirements to Receive State Funds							
Implementation of IDEA Stipulations for Students with Disabilities							
LEA Accountability in the Use and Distribution of Proportionate Share Funds							

Question 4: (0) Invalid Accountability Practice (1-2) May or May Not offer Accountability (3-4) Essential Accountability Practice

What is your philosophy on the development of IEPs, as stipulated in the Individuals with Disabilities Education Act, for students in private schools who are diagnosed with IDDs?	P1	P2	P3	P4	P5	P6	P7
IEP or other development plan is essential in demonstrating student progress							
IEPs are not mandated and should be the choice of the private school							
IEPs are the blueprint for the year and can be developed from formal assessment and informal documentation							

Question 5: (0) Invalid Accountability Practice (1-2) May or May Not offer Accountability (3-4) Essential Accountability Practice

What accountability measurements should be inherent in teacher evaluations?	P1	P2	P3	P4	P5	P6	P7
Teacher Certification							

Special Education Degree							
Classroom management							
Collaboration							
Purposeful Planning							
Knowledge of cognitive function of students							
Student Centered Learning							
Innovative with Technology							
Improvement Plan rather than Compliance Driven							

Question 6: (0) Invalid Practice (1-2) Has value but not Considered Best Practices (3-5) Essential Best Practices

How can administrators use fiscal and human resources to influence student-centered, high quality instruction in private schools serving students with IDD?	P1	P2	P3	P4	P5	P6	P7
Implement Teacher Planning into Schedules							
Implement PLC Time with Appropriate Leadership							
Peer Observation Time							
Individual Goal Setting for Teacher Growth							
Professional Development Opportunities Supported by Administration							
Coaching and Modeling Practices							

Integrating Community Resources							
Development Team to Assist in Fund-Raising and Increasing Community Awareness of Mission							

Question 7: (0) Invalid Practice (1-2) Has value but not Considered Best Practices (3-5) Essential Best Practices

How does school culture influence professional development on best practices? How should best practices be modeled and evaluated to assess teacher adherence to those practices?	P1	P2	P3	P4	P5	P6	P7
Creating a Culture of Collaboration for Good Teaching							
Administration Modeling Sharing Ideas and Learning Opportunities Among Staff							
Peer Coaching							
Individualized Professional Development and not a Global Approach to PD							

Question 8: (0) Invalid Practice (1-2) Has value but not Considered Best Practices (3-5) Essential Best Practices

What best practices in special education should be inherent in private school culture to impact the success of students with IDDs?	P1	P2	P3	P4	P5	P6	P7
Implementation of PD that is provided							
Supporting lesson plan development to implement PD							

A Variety of Instructional Models and Therapeutic Supports Within the Classroom to Address the Whole Child							
Individualized Student Instruction							
Individualized Teacher Support for Growth							
Face to Face Instruction							
Frequent Class Visits and Teacher Support							
Understanding of ABA or Positive Behavior Reinforcement to Impact Student Behavior							

Question 9: (0) Invalid Practice (1-2) Has value but not Considered Best Practices (3-5) Essential Best Practices

What do you identify as best practices which provide opportunities for teacher collaboration and decision-making regarding instructional planning, student academic and behavioral reflections and data driven interventions? What do you identify as practices for teacher coaching and evaluation?	P1	P2	P3	P4	P5	P6	P7
Professional Development on Assessments and Data Collection							
Appropriate leadership at grade level to help implement data driven decisions							
Identify yourself and your expectations as a leader so staff know what you are looking for.							
Bring parents into the process							
Coaching on the IEP Writing Process							

Question 10: (0) Invalid Practice (1-2) Has value but not Considered Best Practices (3-5) Essential Best Practices

What is your expert opinion on the value of non-academic, age appropriate activities which allow for inclusive social opportunities with same age neurotypical peers? How important are these activities?	P1	P2	P3	P4	P5	P6	P7
Opportunity to practice and implement social skills.							
Need to educate students you are integrating with about disabilities to protect from possible bullying.							
Some students may be reluctant to participate as a result of past bullying experiences.							

Question 11: (0) Invalid Practice (1-2) Has value but not Considered Best Practices (3-5) Essential Best Practices

What is your expert opinion on the value of community based vocational training for students with IDD which is implemented with non-disabled individuals?	P1	P2	P3	P4	P5	P6	P7
Essential for continued life skills of students with intellectual and developmental differences.							
Vocational training and integration with community based volunteer employment experience.							

Question 12: (0) Invalid Practice (1-2) Has value but not Considered Best Practices (3-5) Essential Best Practices

Are there other practices that are important to your school that I forgot to ask about?	P1	P2	P3	P4	P5	P6	P7

Appropriate Curriculum is Critical							
Parental Involvement and Resource to Navigate Community Resources							
Fiscal Audit for all Schools Provided to the State							

Round Three: Final Recommendations

Finally, interpretation was used to reflect upon what the data means (Merriam & Tisdell, 2015, pp. 229-230). Recommendations which met the mean score of at least 3.0 were included in one of the 6 components of the framework: accountability, curriculum, assessment, accountability, personnel training and development, funding, and governance. Results were provided a third time, which allowed participants the opportunity to change, adjust or reiterate their opinions. In addition, after determining overlap of recommended personnel training development, HLPs were added to the document for review and consideration as part of the best practices to be included in final recommendations. Panelists submitted agreement to the document. Two panelists voiced concern regarding oversite of the recommended practices. Panelists were reminded that these recommendations are intended to be voluntary at this time, and are not submitted as policy change. When consensus was confirmed from each panelist, all panelists were notified.

Credibility and Trustworthiness

Caution regarding bias is critical as "the researcher is the primary instrument for data collection and analysis" (Merriam & Tisdell, 2015, p.16). Lincoln and Guba (1985) articulated the issue of trustworthiness by asking "how can an inquirer persuade his or her audiences (including self) that the findings of an inquiry are worthy paying attention to, worth taking account of?" (p. 290). Given that the purpose of this study was to persuade other private schools of the validity of implementing EBPs and accountability strategies into their special education programs, this definition has significance. Research for this study was conducted with a bias in favor of the success of private school education for students with significant intellectual

disabilities and the concern that many private schools do not uphold standards or practices of accountability which demonstrate student academic or social progress and teacher development and support.

Merriam and Tisdell (2015) discuss that the rationale of qualitative research may be to seek understanding rather than to test a hypothesis. Lincoln and Guba (1985) identified four questions whose answers lead to establishment of internal and external validity, reliability and objectivity of a study.

The first question is how the researcher may establish confidence in the "truth of the findings" in order to establish internal validity (p.290). It should be noted that internal validity in this study may be impacted by the history and experience of the experts who provided guidance to develop standards of practice and accountability in private schools. Each expert came to the questions with a varied background and experiences and the study was structured so that each could be impacted by the insight of other experts who participated in the Delphi process.

The second question pertains to applicability and asks the researcher how findings may be applicable to other contexts (p. 290). This question is valid in externally applying recommendations of experts and assuming that other private schools have the leadership, financial means, teacher expertise and parent support to implement the recommendations. Therefore, it is imperative to note that, at this point in research, alignment with the recommendations must be voluntary from private schools and not mandated.

The third question pertains to consistency and how the researcher may determine whether the findings of the study could be duplicated with other similar subjects and context (p.290). This study is specific to students with intellectual disabilities and it is not assumed that schools that

serve students with other disabilities would have the same recommended practices or accountability measures.

The final question that Lincoln and Guba put forth addresses neutrality. "How does one establish the degree to which findings of an inquiry are determined by the subjects (respondents) and conditions of the inquiry and not by the biases, motivations, interests or perspectives of the inquirer?" (pg.290). This question gives the greatest concern in this study. In order to avoid eliciting biased answers from private school experts, questions focused on practices rather than placement. The interview questions were developed to elicit responses pertaining to program oversight supporting high quality educational opportunities for students with IDDs as their rights are outlined under IDEA, but with consideration of parental choice for placement. Care was taken to avoid the discussion of inclusive education in public school and to acknowledge the lack of accountability standards set forth for private schools. The interview process allowed the researcher to design questions which evoked complex answers and details to bring understanding of the practices used in private schools. The interview process was less abstract and allowed for the interviewer to expand on questions and answers, seeking clarity and avoiding bias in interpretation of responses.

Clarifying and developing consensus through repeated data submission and panelist review of data provides internal validity through triangulation to confirm findings (Denzin, 1978, as cited in Merriam & Tisdell, 2015). Additionally, through the process of resubmitting data results to the interviewees, the process relied on respondent validation or member checking to confirm accurate reflection of information obtained (Merriam & Tisdell, 2015).

Chapter Summary

This chapter identifies the thought process in determining a Delphi study as the most appropriate method to develop this research. It provides an overview of the Delphi process and establishes criteria for expert panel selection. The panel selection process was reviewed as well as identifying background demographic information for the panelists. There were three rounds of data collection consisting of panelist interviews and review of interview transcripts in round one, scoring of data to rank value as a practice in round 2 and to remove practices which did not meet the identified mean of essential criteria. Round three encompassed the final presentation of an outline of accountability measurements and recommended fundamental standards of practice. Panelists were to review the recommendations and submit to the researcher any concerns with the . Each panelist reviewed the data and submitted agreement before moving to the next round. All panelists submitted in writing that the final document had achieved consensus for the purpose of voluntary implementation.

CHAPTER 4: FINDINGS

The purpose of this research was to use a Delphi study (Helmer& Rescher, 1959) to interview a team of experts in private school special education to arrive at consensus about accountability measurements that could promote best practices standards. The results and discussion that follow identify practices that may advance learning for students with IDDs, and that can be tightly coupled with accountability plans for monitoring and reporting on the effectiveness of instructional programs, teacher development and family support.

Data collection and analysis involved in-depth individual interviews, of which transcripts were reviewed by participants; presentation and ranking of collected recommendations in the form of a survey by participants; and final review of recommendations. Thus data was presented and re-presented three times to each participant to assure validity, accuracy and agreement. Themes emerged from the majority of interview questions, though some experts disagreed on the recommended standards and processes. Detailed questions and responses, and an agreed set of recommendations, are discussed in the following sections.

Findings from Data Collection

Confidentiality was maintained in the study by using pseudonyms in place of names or institutions. The study emphasized to panelists that the intent of the interview questions was to

discuss what they believed were the best accountability measures and practices, even if those practices varied from what was implemented in their current institution.

Round One: Interviews

Interview Question 1: What specific processes do you believe are important which exhibit accountability in special education? Do these measurements align with state accountability practices?

Initial interview responses were varied among participants. Those administrators with experience in accredited private schools felt strongly that third party oversight raises standards through the accreditation process. While panelists in the study were asked to provide answers which they believed were practices that should be implemented, there were responses where personal perspectives biased the intent of the question by analyzing whether a practice was feasible regarding whether a practice such as accreditation was financially feasible or staffing would allow collaborative practices to occur. Other participants voiced concern about smaller schools being able to afford the costs associated with reputable and appropriate accreditation agencies and believe that the state should be more involved in site visits to schools to assess the standards which qualify private schools to receive state funds. The FLDOE General Requirements for Private Schools state that "legislative intent is not to regulate, control, approve, or accredit private educational institutions" (FLDOE, 2020). Panelist agreed, without policy change, this oversight for increased standards must come from an external organization. All panelists agreed that the admissions process for acceptance of students is critical and that private schools should only accept McKay and Gardiner funding for students whom they are able to support with instructional and behavioral programming. This admissions process includes

detailed reviews of evaluations, IEPs and parent input, followed by a student visitation day, input from both current and prospective classroom teachers and administration before acceptance is determined. Panelists each cited awareness of schools who accept students who required additional learning or behavior accommodations which the school was unequipped to provide. They agreed that acceptance of students who dictate accommodations which a school is unable to provide is a misuse of state dollars and that it is the ethical responsibility of school leadership to protect the educational rights of students by assuring the enrollment of students who are within their school's mission and staffing credentials. There was discussion with two panelists regarding the referral processes among private schools to assist with appropriate placement acknowledging a lack of knowledge about other private schools' standards and the reluctance to refer without knowledge of practices. There is no current system in place for school leaders or parents to gain information about what disabilities various private schools are able to accommodate so that if an inquiry is made to one school, they may serve as a referral source for that family to assist in appropriate placement. Panelists stated that they try to acquire knowledge of schools in their areas to be able to refer families if they are unable to serve them or have if they are at capacity. This referral practice is determined by the personal knowledge of school personnel, but there is no system at a local level which administrators or parents may access current enrollment information about private schools, disabilities which may be served, accommodations schools are able to provide and the accountability measures or practices that are used.`

With regards to teacher credentialing, FLDOE currently requires private schools to submit fingerprints of all school employees to the Florida Department of Law Enforcement for a

criminal background check. However, the owners of private elementary and secondary schools in Florida are solely responsible for all aspects of their educational programs, including "certification, qualification, and training of teachers and administrators" (FLDOE/SchoolChoice/k12PrivateSchools/GeneralRequirements, 2020). The question of teacher qualifications elicited a range of responses including a preference for hiring teachers without special education degrees to teachers who are degreed in field but may not be Florida certified. One panelist felt strongly that her teachers which did not have a special education background held students to higher standards than those she had hired who held special education degrees. She stated that she preferred the teaching criteria of staff who come from a general education background and are taught special education methods. Another panelist stated that teachers are encouraged to gain and maintain certification by providing financial incentives. Those administrators with accredited institutions believed that the accrediting body has teacher credential and professional development built into the accrediting standards which raises the qualifications for teachers.

Another consistently identified process for accountability identified by panelists was the need for data driven assessments to demonstrate appropriateness of student placement as well as gains in academic, behavioral, and social skills. Although it is not required of private schools, each of the participants reported using a yearly accountability plan which demonstrates student progress on specific individual objectives similar to an IEP. One administrator described it as an individual roadmap for each student's identified learning objectives and felt that it provided holistic knowledge of each student supported by data.

Interview Question 2: How do school policies influence accountability in addressing the requirements of serving students with IDD and their families? Should accountability policies be implemented by the state for schools who access voucher funds for students with IDDs?

The determination of who sets private school policy treads on the toes of private school jurisdiction. While private schools in Florida can receive state funding to educate students with disabilities, the state steps back in determining the specific accountability measurements and best practices which regulate the institutions, including:

- certification, qualification, and training of teachers and administrators;
- content and comprehensiveness of the curriculum;
- duties, qualifications, and salaries of faculty and staff; tuition, class size, fee scales, pupil expenditures, and refund policies;
- student assessment, academic credits, grades, and graduation or promotion requirements;
- student regulation, dismissal, and expulsion policies; and
- student records content, retention, transfer, and release. (Florida Department of Education, 2020)

Panel experts each stated in the interview that there was a need for oversight from an outside organization, such as National Association of Private Special Education Centers or a state accrediting agency such as the Florida Council of Independent Schools. Again, those administrators who had experience with an accreditation process stated that the standards of accreditation brought the institution to a higher quality of programming, teacher development, student progress, curriculum selection and financial soundness. Others without accreditation felt that the state requires a fair amount of reporting, citing quarterly attendance, annual audits,

annual survey and school compliance submissions but felt that the DOE should take a more hands-on approach to program monitoring through annual site visits. One panelist stated that parents are looking to the school as the experts with answers and that parents need to be able to differentiate between those that meet and exceed standards and those that are barely making it. Another panelist commented that if standards come from the state those standards will be handled with more fidelity than if they come from individual institutions or varying accreditation agencies. She noted that accrediting bodies vary in their own standards and a school could purchase an accreditation online, but still not reflect best practices which promote student progress or high leverage practices. She felt that standards placed by the state would align more with standards reflected in IDEA and public school programs. Individualized standards specific to each institution are what makes private schools unique but do not lend to unified accountability practices. One panelist stated that if a school wants to be a high-quality institution, then they will seek out high quality accreditation, not only to be held accountable, but to help with programmatic and operational improvement.

Interview Question 3: Are there other considerations which have been, or should be, influential in shaping accountability in private schools serving students with IDDs?

A panelist stated in response to this question that accreditation helps to keep parents from being taken advantage of and that the private schools owe families a system that is safe and responsible. Some panelists suggested new accountability requirements, including accreditation requirements tied to the receipt of state funds, private school implementation of IDEA requirements for students with disabilities, and comparable use and distribution of proportionate share funds by the local education agency in collaboration with private schools. These suggested

requirements all align with financial accountability. Recording panelist' definitions of accountability provided insight into a range of informal to formal measures which panelists defined as accountability measures. Definitions of accountability included:

1. Admissions processes, background checks for all staff &/or volunteers, and having written policies and procedures.
2. Implementation of IDEA standards for students with disabilities.
3. Accountability is a means by which the policy makers at the state and district levels, as well as parents and taxpayers can monitor the performance of students and schools, holding teachers, staff, administration, students and parents responsible for the policies and procedures the school has put in place.
4. Educational accountability is a shared responsibility between the parent and the school to ensure that each child receives his/her academic, social/emotional, and physical needs met."
5. Being transparent in all areas and honest with all involved.

Two panelists did not provide a definition. Some of these definitions were simply that – definitions and did not identify measures which identify if accountability is being met. If definition variations reflect structural variations of accountability, research should identify a clear definition of accountability which reflects practices or measurements and must be obtained before consensus of accountability standards can be established.

Interview Question 4: What is your philosophy on the development of IEPs, as stipulated in the Individuals with Disabilities Education Act, for students in private schools who are diagnosed with IDDs?

Answers to this question were somewhat redundant because in discussing question 1 in response many panelists mentioned IEPs as a measurement of accountability. Nevertheless it is important to note the consistency and strong philosophy among each of the panelists that a document such as an IEP is a valid measurement of student progress and should be included as part of the educational process in private schools serving students with disabilities. It was stated in response to asking about the necessity of IEPs that schools can't be accountable if they do not have documentation which indicates where a student started and what their progress is.

Interview Question 5: What accountability measurements should be inherent in teacher evaluations?

Panelists identified possible accountability measurements for teacher evaluation and development in the areas of teacher certification, special education degree, classroom management, collaborative skills, purposeful planning, knowledge of cognitive function of students, student centered learning, innovation with technology and developing an improvement plan for student growth. While certification and teacher degree are not teacher evaluative considerations, some panelists voiced positive consideration if a teacher had secured an advanced degree, certification or additional credentials which aligned with specialization that supported the student population. Some disagreement was voiced among participants regarding the need for either teacher certification or for a teacher to hold a special education degree if they are certified. One panelist stated that teachers with a general education background held her students with disabilities to higher expectations than teachers she had worked with who have special education degrees. It was stated by most panelists that high quality teachers should be able to identify areas for personal growth as even veteran teachers can learn new skills from

younger teachers. One participant admitted being less consistent about the evaluative process because the staff has remained consistent with little turnover. Additionally, most administrators reported consistent classroom visits were more informative than one evaluative observation. The panelist believed that by participating in several "informal" classroom observations, they were able to obtain insight into classroom management and student engagement which occurred across time and not in an isolated visit. The term "teacher evaluation" was discussed with acknowledgement that referencing the evaluative process as a professional growth meeting fostered more open conversation regarding areas where each staff member wanted to gain additional skills. Another panelist reported that viewing the conversation from the perspective of teacher professional development opportunities rather than an evaluative process has improved their culture of cooperation and helped to establish more collaborative learning. The panelist stated that this approach allowed for individualized PD to be established through coaching and mentoring which matched teacher goals for growth, rather than using a one size fits all approach to teacher growth.

Interview Question 6: How can administrators use fiscal and human resources to influence student-centered, high quality instruction in private schools serving students with IDD?

This question elicited deeper conversation and explanation as it was interpreted from various perspectives, but each panelist gave validity to their answers. Although this question could be interpreted as one of private school financial resource development, it was also intended to reflect the various leadership roles which can be supported and developed in teaching staff, parent groups and the community. Many of the panelists referenced the importance of providing

the resource of time for teachers to be able to collaborate, plan lessons, develop IEPs and develop and use data-based assessments. The administrators all discussed the importance of having an adequate budget to supply teachers with an appropriate curriculum and materials that teachers themselves did not have to purchase. This question overlapped question 5 in the area of teacher evaluation and growth. Professional Learning Communities (PLCs) for teachers within similar grade bands were implemented at three of the programs where expert participants had been in leadership, while the others reported scheduling time for teachers to meet as grade levels and to have planning time built into their weekly schedules. Important resources for teacher development and support include professional development that is geared toward individual teacher learning objectives and administration-supported professional development opportunities. Those who ran PLCs reported the need for administrative involvement or a liaison between the teachers and administration. It was stated that without the appropriate leadership, PLCs may become a break time without focus and direction when they are intended to be student driven or an opportunity for professional growth. One panelist stated that when she began PLCs, she fired her team leads and interviewed candidates for the PLC lead position because there is a different emphasis on professional growth than a team lead may demonstrate. The interview question also elicited discussion of the importance of community awareness of the organization's mission in order to foster volunteer and financial support. Understanding was expressed that there should be a separate development team to integrate community resources, so teachers had materials and curriculum to provide instruction and support students with intellectual and developmental differences require.

Interview Question 7: How does school culture influence professional development on best practices? How should best practices be modeled and evaluated to assess teacher adherence to those practices?

Participants agreed that school culture begins with the school leadership. Each respondent stated that modeling the desired culture is imperative. They expressed agreement that administration must model a culture of sharing ideas and learning opportunities for all staff. It was stated that if teacher collaboration is important to administration, school leadership must model a collaborative approach, sharing ideas and learning opportunities. Panelists stated that it is essential to create a culture of collaboration to establish good teaching practices, to prioritize opportunities for peer coaching when appropriate, and to individualize professional development to the needs of each teacher and not assume a global approach where everyone gets the same. One participant emphasized the value of appropriate quality and quantity of professional development while creating opportunities for teachers to observe and learn from one another. A consistent theme by experts referenced the importance of administrative mentoring and modeling to allow structure for what must be taught but freedom in teaching.

Interview Question 8: What best practices in special education should be inherent in private school culture to impact the success of students with IDDs?

The study participants stressed the importance of student assessment, adequate teacher planning and appropriate professional development. One administrator stressed the importance of differentiating between a department meeting and a Professional Learning Community, stating leadership must model and then facilitate reflective questions which promote creative strategizing for instruction and problem solving. Another stressed the importance of parent

inclusion, training, and support, when considering the social, emotional and academic needs of the students. Participants placed significant emphasis on teacher experience, training and the development of a coaching and peer mentoring model, while maintaining administrative approachability. The use of HLPs was discussed as a means of developing a coaching framework for staff. Some administrators were not familiar with the HLPs outlined by the CEC and CEEDAR but named many of those practices as training procedures. In response to this point, the HLPs were provided to participants after all interviewees were completed for reflection and consideration for inclusion in recommended standards. Beyond providing opportunities for professional development, one participant discussed the importance and struggle of implementation of the PD provided, stressing the need to assist teachers in developing lesson plans and strategies which consider and utilize new methods presented. One panelist referenced the use of support services for the students. She stated that these services, such as speech and language pathologists, occupational therapists and behaviorist should also educate teachers regarding these aspects of student disabilities and how the classroom is impacted. The identification and use of these materials which support the student should be implemented with the assistance of resource personnel to create a holistic instructional environment, considering how the need for these services impacts learning.

Interview Question 9: What do you identify as best practices which provide opportunities for teacher collaboration and decision-making regarding instructional planning, student

academic and behavioral reflections and data driven interventions? What do you identify as practices for teacher coaching and evaluation?

The participants agreed that administration must prioritize implementation of best practices such as teacher collaboration, planning, professional development and data driven decisions including assessment. Change is hard and the decision to utilize best practices must be intentional and leadership driven. Participants discussed methods for practices of teacher coaching and the difficulties of coordinating planning times. All participants agreed on the value of a coaching model, whether through grade level or partnerships. One expert stated that she believed the size of the school impacted a school's ability to implement peer coaching, with smaller schools having social considerations come into play among a smaller staff, again pointing to the need for strong leadership to precipitate a culture of sharing and learning from one another. The value of parent inclusion in the learning process was discussed not only with respect to the IEP process but for teachers to understand the knowledge that a parent brings regarding their child. One panelist reflected that the private school relationship with families has a different dynamic than in public schools. Families in private schools are consumers and are paying for educational services. While students with disabilities have the support of state vouchers, often the cost of tuition is greater than the allotted voucher. This consideration may impact administrative decisions and those decisions impact the classroom. Best practices would drive a team educational approach that includes the family. Study participants again highlighted the need for leadership to educate teachers regarding family inclusion and relationships, beyond the annual IEP meeting. This concept was defined more generally as leaders identifying their expectations. That is, teachers should know an administrator's expectations both in and out of the

classroom. Teacher evaluations should have input from numerous interactions and review methods, reflecting on receptivity to implementation of mentoring and PD, as well as movement toward identified annual professional growth objectives specific to each teacher.

Interview Question 10: What is your expert opinion on the value of non-academic, age appropriate activities which allow for inclusive social opportunities with same age neurotypical peers? How important are these activities?

While all participants supported inclusion of students with disabilities, most agreed that without the right resources and personnel in place, inclusion was often ineffective either academically or socially. They went on to explain that if there is a teacher who is driven to include the student with disabilities, and administration supports inclusion and funding allows for the resources needed, a student with disabilities may do as well in inclusion as research has shown. They also stated that if any of the factors above are not in place, their experience is that the student with IDD may suffer through lost academics, bullying and poor support. Acknowledging the benefits of interaction with non-disabled peers, some experts were still protective of their students based on some of the bullying experiences they had prior to coming to the private school. One expert stated "there is value in the programming for students to have greater experiences and bringing in students who do not have delays. However, some have been pretty emotionally beaten up and they just want to be accepted for who they are.". Other panelists stated that peer to peer activities are critical, allowing students with disabilities to feel accepted and providing opportunities to practice social skills and prepare them unsupervised social settings in the community as well as for vocational practice.

Interview Question 11: What is your expert opinion on the value of community based vocational training for students with IDD which is implemented with non-disabled individuals?

Participants stated that independent living and vocational training is an essential part of programming for students with IDDs, reiterating if you are unable to provide curriculum and opportunities for this training, you should not be serving these students. One panelist stated, "If you are going to accept students of transitional age you must have programs which support their needs and vocational training is part of that need."

Interview Question 12: Are there other practices that are important to your school that I forgot to ask about?

In addition to the practices outlined, panelists mentioned the importance of allowing students to have exposure to and experience with to a high quality, knowledge based curriculum. There was additional discussion of the importance of providing a curriculum which matches state standards and the ability to assess student progress. Several participants reviewed the use of data in decision making, both for school wide decisions and individual student decisions, stating accountability is tied to how data is being utilized. Financial transparency was identified as a factor of accountability regardless of program size. All participants described the importance of school culture and the leadership establishing that culture. There was consensus that accountability and best practices happen with intentionality and the onus falls on leadership to drive these practices. Collecting data, assessment, IEPs and differentiated curriculum all take time and add additional responsibilities to private schools. Experts in this study showed consistent support for utilizing accountability and best practice measurements, whether in public

or private schools. Private schools have to independently commit to take on these responsibilities to provide high quality educational opportunities for the students with IDDs that they serve.

Round Two: Participant Scoring of Responses by Survey

All participant responses were categorized by question. Questions 1-5 were organized into tables with a response scale of 0 if participants felt there was no accountability value in the answer provided; 1-2 to indicate there may or may not be accountability in the suggested recommendation but that it was not essential; or 3-4 to indicate the practice was a valid measurement of accountability. Questions 6-12 were organized into tables with a response scale of 0 if participants felt there was no value as a best practice in the recommendation; 1-2 to indicate there may or may not be values as a best practice in the recommendation but that it was not essential; and 3-5 to indicate an essential recommendation. The variation of scoring ranges in accountability measures (questions 1-5) versus best practices (questions 6-12) was utilized to assess the degree of value placed on the practice. The scales were determined to place a value ranking on panelist' responses beyond a yes or no agreement in the inclusion of a process as a recommended practice. It was intended to give the panelist a greater voice in the value of practices they would place as more or less valuable than others. The researcher believed that the best practices may elicit a wider range of positive responses and wanted to assure that all practices were included if they should be and not eliminated through bias if a panelist' response was based on ability to implement the practice.

The tables were presented to panelists individually via email with a request to rate each item. The compiled responses determined the inclusion of each item in final recommendations for accountability and best practices. If the average response ranked below a 3.0 in either

accountability or best practice, it was eliminated from the final recommendations. As an example, participant responses did not reach consensus regarding accreditation requirements. Some participants indicated the highest score (4) for accreditation requirements and oversight as an essential means of establishing policy and receiving state and federal funding, other panelists scored the item as non-essential with no value (0). Items suggesting accreditation were removed from the final recommendations as the overall score of 2.47 regarding accreditation did not meet the definition of an essential means of measuring accountability, scoring over 3.0.

Upon completion of ranking, recommendations that scored at least a mean of 3.0 were coded to one of the identified policy framework areas (Roach et al, 2002): accountability, curriculum, assessment, accountability, personnel training and development, funding, and governance to determine the final recommendations. All items and individualized scoring are shown in Table 4.1. While analyzing best practices, similarities between participant-identified practices and the high leverage practices recommended by the CEC and CEEDAR were noted. As a result of these similarities, the CEC and CEEDAR HLPs were sent to the Delphi panelists for consideration and consensus of inclusion in the framework of personnel development and training. All panelists agreed that inclusion of these research based HLPs added validity to those practices recommended to private schools serving students with IDDs. See Table 4.1 below.

Table 4.1:

Participant Scoring of Recommendations Derived from Interviews

Notes: Ranking Scale: 0=invalid accountability practice; 1-2=may or may not offer accountability; 3-4=essential accountability practice

Question 1: What specific processes do you believe are important which exhibit accountability in special education? Do these measurements align with state accountability practices?	BA1	KL2	TP3	PL4	LP5	ER6	NS7	Mean Rating
Data driven assessment	3	4	4	3	3	4	4	3.57
Admissions process to determine appropriateness of placement – only accept students you have the ability to serve	4	3	4	4	4	3	4	3.71
Staff background checks	4	4	4	4	3	3	4	3.71
Teacher credentialing standards for degreed in field of special education	2	1	3	3	3	4	4	2.86
Teacher credentialing standards for certification	3	2	4	4	3	4	3	3.29
IEP development	1	3	4	4	3	4	3	3.14
Individual knowledge of each student which is supported by data	4	4	4	4	4	4	4	4.00
Consistency and standardization of processes across time	3	3	4	4	4	4	3	3.57
Accreditation or oversight by an outside agency	2	2	4	3	0	3	3	2.43

Notes: Ranking Scale: 0=invalid accountability practice; 1-2=may or may not offer accountability; 3-4=essential accountability practice

Question 2: How do school policies influence accountability in addressing the requirements of serving students with IDD and their families? Should accountability policies be implemented by the state for schools who access voucher funds for students with IDDs?	BA1	KL2	TP3	PL4	LP5	ER7	NS7	Mean rating
Policies are administered by the state	2	3	4	4	1	3	3	2.85
Policies are determined by a board of directors	3	2	4	3	1	3	4	2.85
Policies are set specific to student population by school administration	4	3	2	4	4	4	4	3.57
Policies are determined by accreditation requirements	3	3	4	3	1	3	3	2.86
Policies are influenced by what is modeled in other high quality schools	3	1	0	3	2	2	3	2.00
Policy includes annual visitation from the Department of Education	3	2	0	3	2	3	2	2.14

Notes: Ranking Scale: 0=invalid accountability practice; 1-2=may or may not offer accountability; 3-4=essential accountability practice

Question 3: Are there other considerations which have been, or should be, influential in shaping accountability in private schools serving students with IDDs?	BA1	KL2	TP3	PL4	LP5	ER6	NS7	Mean rating
Accreditation requirements to receive state funds	0	1	4	4	0	3	3	2.14
Implementation of IDEA stipulations for students with disabilities	1	4	4	4	2	3	4	2.14
LEA accountability in the use and distribution of proportionate share funds	2	3	4	3	2	3	4	3.00

Notes: Ranking Scale: 0=invalid accountability practice; 1-2=may or may not offer accountability; 3-4=essential accountability practice

Question 4: What is your philosophy on the development of IEPs, as stipulated in the Individuals with Disabilities Education Act, for students in private schools who are diagnosed with IDDs?	BA1	KL2	TP3	PL4	LP5	ER8	NS7	Mean rating
IEP or other development plan is essential in demonstrating student progress	4	4	4	3	4	4	2	3.58
IEPs are not mandated and should be the choice of the private school	2	2	4	2	2	0	3	2.43
IEPs are the blueprint for the year and can be developed from formal assessment and informal documentation	3	4	4	2	3	4	3	3.29

Notes: Ranking Scale: 0=invalid accountability practice; 1-2=may or may not offer accountability; 3-4=essential accountability practice

Question 5: What accountability measurements should be inherent in teacher evaluations?	BA1	KL2	TP3	PL4	LP5	ER6	NS7	Mean rating
Teacher certification	3	1	0	3	2	4	4	2.43
Special education degree	3	2	0	2	2	4	4	2.43
Classroom management	4	4	4	4	4	4	4	4.00
Collaboration	4	3	4	3	3	4	4	3.29
Purposeful planning	4	4	4	4	4	4	4	4.00
Knowledge of cognitive function of students	4	4	4	4	4	4	4	4.00
Student centered learning	4	3	4	4	4	4	4	3.86
Innovative with technology	4	3	4	3	2	4	4	3.71
Improvement plan rather than compliance driven	4	3	3	3	4	4	4	3.29

Notes: Ranking Scale: 0=invalid accountability practice; 1-2=may or may not offer accountability; 3-4=essential accountability practice

Question 6: How can administrators use fiscal and human resources to influence student-centered, high quality instruction in private schools serving students with IDD?	BA1	KL2	TP3	PL4	LP5	ER6	NS7	Mean rating
Implement teacher planning into schedules	5	5	5	5	3	4	4	4.43
Implement PLC time with appropriate leadership	3	5	5	4	3	4	4	4.00
Peer observation time	2	5	5	4	3	4	4	3.86
Individual goal setting for teacher growth	4	5	5	4	3	4	4	4.14
Professional development opportunities supported by administration	5	5	5	3	3	4	4	4.14
Coaching and modeling practices	5	5	5	4	3	4	4	4.29
Integrating community resources	3	4	4	2	3	4	4	3.43
Development team to assist in fund-raising and increasing community awareness of mission	2	4	4	1	3	3	3	2.86

Notes: Ranking Scale: 0=invalid practice; 1-2=has value but not considered best practice; 3-5=essential best practice

Question 7: How does school culture influence professional development on best practices? How should best practices be modeled and evaluated to assess teacher adherence to those practices?	BA1	KL2	TP3	PL4	LP5	ER6	NS7	Mean rating
Creating a culture of collaboration for good teaching	5	5	5	5	4	5	4	4.57
Administration modeling sharing ideas and learning opportunities among staff	5	4	5	5	4	4	4	4.43
Peer coaching	3	5	4	4	3	4	4	4.00
Individualized professional development and not a global approach to PD	4	4	5	3	3	4	4	4.00

Notes: Ranking Scale: 0=invalid practice; 1-2=has value but not considered best practice; 3-5=essential best practice

Question 8: What best practices in special education should be inherent in private school culture to impact the success of students with IDDs?	BA1	KL2	TP3	PL4	LP5	ER6	NS7	Mean rating
Implementation of PD that is provided	5	5	4	3	3	3	4	4.00
Supporting lesson plan development to implement PD	5	4	4	4	3	5	4	4.14
Variety of instructional models and therapeutic supports within the classroom to address the whole child	5	5	5	5	3	5	4	4.71
Individualized student instruction	5	5	5	4	4	5	4	4.57
Individualized teacher support for growth	5	5	4	3	4	4	4	4.14
Face to face instruction	4	4	5	4	4	4	4	4.43
Frequent class visits and teacher support	5	4	5	5	4	4	4	4.43
Understanding of positive behavior reinforcement to impact student behavior	4	5	5	5	4	4	4	4.43

Notes: Ranking Scale: 0=invalid practice; 1-2=has value but not considered best practice; 3-5=essential best practice

Question 9: What do you identify as best practices which provide opportunities for teacher collaboration and decision-making regarding instructional planning, student academic and behavioral reflections and data driven interventions? What do you identify as practices for teacher coaching and evaluation?	BA1	KL2	TP3	PL4	LP5	ER6	NS7	Mean rating
Professional development on assessments and data collection	3	3	5	4	3	5	4	4.00
Appropriate leadership at grade level to help implement data driven decisions	2	2	5	4	3	5	4	3.57
Identify yourself and your expectations as a leader so staff know what you are looking for.	4	2	5	4	4	5	4	4.00
Bring parents into the process	5	4	5	4	4	4	4	4.29
Coaching on the IEP writing process	5	3	5	4	3	5	2	3.86

Notes: Ranking Scale: 0=invalid practice; 1-2=has value but not considered best practice; 3-5=essential best practice

Question 10: What is your expert opinion on the value of non-academic, age appropriate activities which allow for inclusive social opportunities with same age neurotypical peers? How important are these activities?	BA1	KL2	TP3	PL4	LP5	ER6	NS7	Mean rating
Opportunity to practice and implement social skills	5	4	5	5	4	4	4	4.43
Need to educate students you are integrating with about disabilities to protect from possible bullying	2	4	5	4	3	4	4	3.71
Some students may be reluctant to participate as a result of past bullying experiences	2	4	5	3	2	2	3	3.00

Notes: Ranking Scale: 0=invalid practice; 1-2=has value but not considered best practice; 3-5=essential best practice

Question 11: What is your expert opinion on the value of community based vocational training for students with IDD which is implemented with non-disabled individuals?	BA1	KL2	TP3	PL4	LP5	ER6	NS7	Mean rating
Essential for continued life skills of students with intellectual and developmental differences	5	5	5	5	4	5	4	4.71
Vocational training and integration with community based volunteer employment experience	5	5	5	5	4	5	4	4.71

Notes: Ranking Scale: 0=invalid practice; 1-2=has value but not considered best practice; 3-5=essential best practice

Question 12: Are there other practices that are important to your school that I forgot to ask about?	BA1	KL2	TP3	PL4	LP5	ER6	NS7	Mean rating
Appropriate curriculum is critical	5	5	5	5	3	5	4	4.57
Parental involvement and resource to navigate community resources	5	5	5	3	3	4	4	4.14
Fiscal audit for all schools provided to the state	5	5	5	3	3	3	4	4.00

Round Three: Final Recommendations

The final recommendations for accountability measures and best practices for private schools receiving state vouchers for the educations of students with IDDs was distributed for consensus from all participants. Individuals who ranked accreditation highly noted concern regarding the omission of the accreditation recommendations, and over who or what agency would enforce the recommendations if there was no accrediting body. Other feedback was to change verbiage which implied mandates or policy. For example, in order to achieve consensus from the Delphi team, the original recommendation, which stated "In lieu of FAPE, when parents implement a school choice option, private schools will utilize state scholarship funds to develop an appropriate educational plan as developed by the school personnel and agreed upon by the parent/guardian" was changed to "In lieu of FAPE, when parents implement a school choice option, private schools can utilize state scholarship funds to develop an appropriate educational plan as developed by the school personnel and agreed upon by the parent/guardian." A second wording change referenced recommendations private schools producing IEPs. The original wording of the recommendation was, "Private schools will produce individual education plans which outline a student's academic, developmental, and functional needs. The plan will present levels of educational performance, annual goals and benchmarking objectives, and supplementary services to be provided, if applicable." In response to participant feedback, that recommendation was changed to, "Private schools should produce individual education plans which outline a student's academic, developmental and functional needs. The plan should present levels of educational performance, annual goals and benchmarking objectives, and supplementary services to be provided, if applicable." No other changes to the recommendations

were noted and the Delphi team acknowledged consensus through emailed confirmation that there was agreement and the document reflected recommendations for accountability measures and best practices which should be integrated into private school programs serving students with IDDs under Florida state voucher funds. The final recommended standards of accountability measures and best practices for private schools serving students with IDDs may be found below and in Appendix C.

RECOMMENDED STANDARDS OF ACCOUNTABILITY MEASURES AND BEST PRACTICES FOR PRIVATE SCHOOLS SERVING STUDENTS WITH INTELLECTUAL AND DEVELOPMENTAL DISABILITIES

The following are recommended standards of operation for private schools serving students with intellectual and developmental disabilities. The resulting consensus is from a Delphi study incorporating experts in the field of private school special education of students with intellectual and developmental disabilities. These recommended standards follow a policy framework and are as follows:

I. Accountability:

- Admissions Process: Private schools shall have an admissions process which allows for acceptance of students which match set criteria for curriculum, personnel and support services which provide student progress.
- Staff Background Checks: Any staff or volunteers who will have direct contact with students will undergo a state and national background screening with the Florida Department of Law Enforcement.

- In the absence of accreditation by an outside agency, private schools will maintain written policies and procedures to reflect standards for operational and programmatic processes to include:
    i. The school will maintain individual student records which reflect student evaluations, individualized educational programs which identify specified goals and objectives; data to document student progress; documentation of parent involvement in educational planning; documentation of behavioral and academic interventions as needed; curriculum options which match state access points for demonstrated credit toward graduation.
    ii. The school has a curriculum that is developmentally appropriate and provides opportunities which meet the intellectual, emotional, physical, and social needs of its students. The curriculum is data driven to demonstrate mastery of learning goals, and objectives, and includes age appropriate instruction at the student's developmental level for academic, social, behavioral, life management, and career independence.
    iii. The school has access to additional educational support services identified in a student's diagnostic evaluation or documents disclosure to families that such services are unavailable as part of the student's educational plan in the private sector.
    iv. The school's non-academic programs encourage opportunities for social activities which are inclusive of students both with and without disabilities, utilizing these opportunities to educate the community

regarding acceptance and inclusion of students with disabilities in all areas.

v. The school commits to the employment of faculty, administration and staff who exhibit qualifications for their specific roles and responsibilities based on their education, training, and/or professional experience.

vi. The school demonstrates commitment to teacher professional development and growth through demonstrated opportunities for consistent coaching, mentoring and professional development training.

- Implementation of IDEA Standards for Students with Disabilities: while private schools are unable to meet the requirements of IDEA as established in federal law, there is a commitment to meet the standards to the best of the private school's ability.

    i. schools can utilize state scholarship funds to develop an appropriate educational plan as developed by the school personnel and agreed upon by the parent/guardian.

    ii. Evaluation: IDEA requires that a child receives an evaluation implemented by a team of knowledgeable and trained evaluators. Private schools will collaborate with local education agencies (LEA) to refer students for evaluation and to maintain accountability with the LEA in the utilization of proportionate share funds to provide materials and support services as indicated through the evaluative process.

    iii. Individual Education Plan: Private schools will produce individual education plans which outline a student's academic, developmental, and

functional needs. The plan will present levels of educational performance, annual goals and benchmarking objectives, and supplementary services to be provided, if applicable.

iv. LRE: The private school agrees to educate parents regarding the educational environment and that this is a parent decision, not the recommendation of the LEA.

v. Parent Participation: The private school agrees to the inclusion of parent/guardian as an equal participant and decision maker in the student's educational evaluation, planning, and programming.

vi. Procedural Safeguards: While parents relinquish their right to due process in a private school setting, the private school agrees to disclose to the parent/guardian all information pertaining to the educational records of their child and give advance notice regarding evaluations, or concerns regarding the student's placement.

- The private school will use appropriate methods to collect data to drive school improvement decisions.

II. Assessment:

- Individual Education Plan: Private schools should produce individual education plans which outline a student's academic, developmental, and functional needs. The plan should present levels of educational performance, annual goals and benchmarking objectives, and supplementary services to be provided, if applicable. Goals and objectives

will be measured through data collection from formal and informal documentation to demonstrate student progress.

- Data Driven Assessment: Private schools will utilize data driven assessments to establish knowledge of student abilities and progress.
- Professional Development on Assessments and Data Collection: Staff training on assessment and data collection will be provided through recurring professional development either onsite or in collaboration with the LEA.
- Parents are provided with a minimum of quarterly reports regarding student progress.

III. Curriculum:

- The school has a curriculum that is developmentally appropriate and provides opportunities which meet the intellectual, emotional, physical, and social needs of its students. The curriculum is data driven to demonstrate mastery of learning goals, and objectives, and includes age appropriate instruction at the student's developmental level for academic, social, behavioral, life management, and career independence.
- Curriculum allows for a variety of instructional models and therapeutic supports within the classroom to address the needs of the whole child.
- Transition curriculum allows for community based vocational training to be integrated into volunteer employment experiences.
- Social programs are developed to provide students inclusive opportunities to practice and implement social skills with students without disabilities.

IV. Funding:

- Existing state financial accountability measures in place are merited.

- Community resources should be sought to offset operational expenses and to integrate the school's mission within the community, establishing acceptance of individuals with intellectual and developmental disabilities.
- Annual fiscal audit should be provided to the State.

V. Governance:

- School policies are set in compliance with state accountability measures and in support of special education standards
- Administration creates a known culture of collaboration and high expectations, coaching, individualized teacher support and professional development. They provide and support individual and collaborative planning among staff. The culture supports student and teacher progress.

VI. Personnel Training and Development:

- Teachers are provided with opportunities for purposeful individual and collaborative planning.
- Special education teachers are provided coaching on the IEP writing process.
- Credentialing standards for certification should be considered in the teacher evaluative process.
- Teachers are provided professional development training to gain knowledge and skills in high leverage practices as outlined by the CEC and CEEDAR (2017):

Collaboration High-Leverage Practices

1. Collaborate with professionals to increase student success.
2. Organize and facilitate effective meetings with professionals and families.

3. Collaborate with families to support student learning and secure needed services.

Assessment High-Leverage Practices

1. Use multiple sources of information to develop a comprehensive understanding of a student's strengths and needs.
2. Interpret and communicate assessment information with stakeholders to collaboratively design and implement educational programs.
3. Use student assessment data, analyze instructional practices, and make necessary adjustments that improve student outcomes.

c. Social/Emotional/Behavioral High-Leverage Practices

1. Establish a consistent, organized, and respectful learning environment.

2. Provide positive and constructive feedback to guide students' learning and behavior.

3. Teach social behaviors.

4. Conduct functional behavioral assessments to develop individual student behavior support plans. Provide additional professional training on positive behavior reinforcement to support teacher implementation of behavior support plans.

Instruction High-Leverage Practices

1. Identify and prioritize long- and short-term learning goals.
2. Systematically design instruction toward a specific learning goal.
3. Adapt curriculum tasks and materials for specific learning goals.
4. Teach cognitive and metacognitive strategies to support learning and

independence.

5. Provide scaffolded supports.
6. Use explicit instruction.
7. Use flexible grouping.
8. Use strategies to promote active student engagement.
9. Use assistive and instructional technologies.
10. Teach students to maintain and generalize new learning across time and settings.
11. Provide intensive instruction.
12. Provide positive and constructive feedback to guide students' learning and behavior.

Chapter Summary

This Delphi study investigated the independent operation of private schools, addressing accountability measures and best practices. Additionally by using a policy framework formulated by Roach, Salisbury and McGregor (2002), panelists were able to reach consensus in determining accountability measures and best practices to support each of the 6 components of the framework: curriculum, assessment, accountability, personnel training and development, funding, and governance. Through the process of identifying and interviewing seven expert panelists, data was extracted from the interview content and categorized by themes. The themes were assigned as responses to corresponding questions and placed into tables with questions 1-12. After panelists reviewed, approved and gave input, a culmination of all recommended practices and accountability measures which met essential criteria were compiled into a final

document titled “Recommended Accountability Measures and Best Practices”. The document was submitted for final review by panelists, who gave consensus that the document accurately reflected the recommendations of the panel. There was concern voiced by two of the panel members that, without required accreditation or state oversight, there was no agency to assure compliance to the standards. Accreditation was a strong factor for some panelists, while others agreed that third party oversite was needed but were concerned about imposing accreditation costs onto smaller schools. Consensus was reached on this recommendation by stating that there would be formal written policies and procedures to reflect standards of operational and programmatic processes that schools who are not accredited would adopt. Panelists were reminded that the results of this study are not intended to be generalized policy but recommended fundamental procedures which emulate identified best practices for accountability and program standards for private schools educating students with IDDs. As a result, the recommendations should not be mandated or tied to the distribution of state funds without further research to tie implementation to leadership of private schools.

CHAPTER 5: DISCUSSION

This study provides an analysis of current recognized best practices that should be implemented and data that should be tracked by private schools that receive state supportive dollars to educate students with IDDs. The Delphi study was chosen as a constructivist approach to build a policy framework of recommended guidelines for fundamental standards of practice and accountability measures for private schools serving students with IDDs.

Purpose Statement

The purpose of this research was to uncover best practices that advance learning for students with IDDs and that can be tightly coupled with accountability plans for monitoring and reporting on the effectiveness of instructional programs, teacher development and family support. This research used a Delphi study (Helmer & Rescher,1959) to interview a team of experts in private school special education. Their responses are used to derive a consensus about accountability measures that can promote standards for best practices.

Research Questions

From the perspective of experts in private schools for students with IDDs:

1. What accountability measures are or should be in place in private schools that accept state funding to serve students with special needs?
2. What evidence-based and high leverage practices are or should be implemented in private schools that educate students with disabilities?

The first question focused on investigating accountability measures which private schools should implement to sustain high program standards and measurements. The second question

addressed which evidence-based or high leverage practices should be utilized in private schools serving students with IDDs. Based on the findings, though recommendations gave latitude in allowing panelists to identify what should be best practices, these research questions were answered and were appropriate in meeting the purpose of this study.

Synopsis of Findings

The study's participants consisted of seven Florida independent private school special education administrators or administrators with significant experience in the use of state vouchers. These administrators had both instructional and practice experience in special education. The Delphi participants achieved a 100% response rate for completion of the interview and follow-up survey, with all responses deemed usable for the purposes of this study. There was consistency in recommended practices with disagreement regarding who should provide oversight and develop policy. Those recommendations which did not meet scoring criteria of a minimum of 3.0 to identify as an essential practice, were eliminated from the study. The final document was submitted to the participants for consensus. While there was agreement with the recommendations, there was some participant concern over who was to ensure implementation if there was no designated authority overseeing the standards.

Although the research determined there was a need for high level standards of practice within private schools serving students with IDDs and the selected experts were able to identify and recommend these practices, the process resulted in a sense of disillusionment surrounding the current expertise and accountability of private schools which serve students with IDDs. There was also a recognition that, in the state of Florida, there is no oversight for assurances that the implementation of these standards will occur. It was agreed that private school standards for

special education will not be legislatively determined by the Florida State Department of Education at this time. The implementation of recommended accountability measures and best practices would be solely the choice of private school administration. This leads to a second concern which was recognized through analysis of responses to the interview questions in the study. There are no identified credentials for ownership or leadership in private schools which serve students with IDDs. Accrediting organizations such as the Florida Council of Independent Schools hold credentialing standards for school leadership, but the state of Florida does not define credentials to identify who may open or operate a private school which serves students with IDDs, as long as they are able to pass a criminal background screening and demonstrate fiscal soundness. Private schools in the state of Florida have minimal networking opportunities. Not all private schools have a governing Board of Directors. The lack of connectivity and collaboration limits administrative leadership to their own experiences and background knowledge unless they actively seek out leadership connections and professional development to gain knowledge regarding evidence based practices and accountability measures. In this study, all of the panelists met the criteria regarding background experience, academic degree and years in an administrative role, yet there were differences in interview responses which reflected views demonstrating more global leadership knowledge rather than isolated experience that was specific to a single private school administration. Those panelists who had served at a district level or had background experience with oversight of more than one program, provided responses with broader application regarding implemented standards of practice and did not voice limitations or concerns about schools who were unable to meet those benchmarks. Had this Delphi study identified administration with criteria which included leadership at a district level

or higher or multiple private school administrative experiences, it is believed that the recommended practices would include the same evidence based ones found in this research, but additionally would have identified the need for third party oversight. This oversight would have changed the consensus recommendations from "should implement" to "will implement the recommended accountability measures and best practices". Panelists were not resistant to identifying and recommending accountability measures or to the suggestion of oversight. The sticking point in reaching consensus was one of linguistic concern. Panelists stated without mandatory oversight or accreditation, they were uncomfortable making recommendations which stated they will be implemented when there was no organized body to make assurances that the recommendations would be. Recommendations were therefore changed to "should be implemented" and consensus was reached according to the methodology used.

Previous research has substantiated the benefits of public school inclusion programs (Hoppey & McLeskey, 2014), successfully identified evidence based practices in special education (Sanders et al., 2013) and argued the benefits and challenges of school voucher programs (Tang, 2018). This study attempts to fill the gap in research to identify accountability measures and best standards of practice for private schools that educate students with IDDs. Prior to this research, there were no identified studies which attempted to provide guidance for improvement of accountability and or to recommend fundamental practices which support student gains and teacher development at private schools serving students with IDDs. Although this study does not provide adequate research to suggest changes in policy which should be mandated at all private schools, the recommended practices may be voluntarily implemented by private schools that seek a foundational framework to increase accountability

measures and to improve on best practices to elicit student gains and teacher development. There is value in educating private school leadership regarding these practices to encourage and promote high quality educational programs for students with IDDs in private schools.

Comparison of Study to Literature Review

Tang (2018) and Black (2015) cited in Chapter 2, discussed the political dilemmas of school choice and IDEA with reference to allowing parents to choose a school which they believe matches their child's individual needs. As stated in the literature review, an argument for improved private school education would be valid only if the private education market offers a caliber of services that would challenge the public system.

Literature showed that institutions which receive vouchers are not required to adhere to IDEA and thus lack the same standards of accountability required of public schools (Bon, Decker & Strasfeld, 2016). Participants in this research agreed that many private schools do not uphold standards which would support evidence-based practices in the education of students with IDDs. Without standards for quality educational programming, legislation which allows parental choice in placement to educate children with disabilities does not guarantee high program standards.

While they recognized the need for such standards, some panel members expressed concerns about implementation through state jurisdiction. Without jurisdiction from an accrediting body, private schools are left to their own resources to determine accountability for operational and programmatic measures. Though private schools are not legally bound to follow the regulations set forth in IDEA, this study offers a response to a gap in research which provides guidelines for private schools serving students with IDDs which accept state funds. The study

offers recommended practices which fulfill the moral obligation to offer students a high quality education with access to appropriate curriculum in an environment the parent has deemed most appropriate for their child. Experts who participated in this study agreed that there is a great divergence in program quality among private schools, with deficiencies resulting from independent oversight and lack of leadership experience and credentials to operate a school. The study indicates disagreement, even at the expert level, about who should provide oversight of private schools to assure accountability and a high-quality education. Unless private schools have accreditation from a third party or more direct oversight from FLDOE, there is no supervisory management in place to assure quality of educational programming or support services offered to students with disabilities such as are provided in public schools through IDEA. The expert consensus from this study suggests fundamental accountability measures and standards of practices which provide private schools that serve students with IDDs the foundation to demonstrate improved outcomes for students and teachers, thus creating a competitive market.

The least restrictive environment as defined through IDEA as:

"the maximum extent appropriate, children with disabilities . . . are educated with children who are not disabled, and special classes, separate schooling, or other removal of children with disabilities from the regular educational environment occurs only when the nature or severity of the disability of a child is such that education in regular classroom with the use of supplementary aids and services cannot be achieved satisfactorily" (Individuals with Disabilities Education Improvement Act, Sec.1412, 2004). Yet some research (Schinagle, & Bartlett, 2015; Tang, 2018) called into question the literal application of this definition, highlighting the need

for a continuum of placements. Musgrove (2017) emphasized the benefits of evaluating student strengths and abilities rather than highlighting the limitations and supports that will be needed in a specific environment. While it is recognized that private school placement for students with IDDs is viewed as a more restrictive placement due to the separation from nondisabled peers, it must be understood that parents who disagree with the IEP team's recommended placement may utilize private schools in Florida as an alternative educational choice for their student with a disability. This parental choice and the use of state and federal funding should place additional onus on the part of private schools to provide quality education with accountability measures, yet these measures are not mandated and, at this time, may only be implemented through administrative knowledgeable and ethical standards.

Experts in this study reported that some private schools have incorporated a parent understanding page as part of the enrollment process, acknowledging that parents understand that they have given up rights under IDEA. Even so, parent expectation is that school administrators have experience and knowledge to provide the same services indicated on the student IEP and a quality education for their student with disabilities. Research participants suggested that not all private schools are prepared to provide those same services nor the quality of educational programming that parents anticipate.

An inclusive education allows for an educational setting and social opportunities with non-disabled peers. One of the recommendations included in this study is the allowance for peer to peer inclusion in non-academic activities. Through these recommendations, these experts acknowledged the value and importance of inclusion and integration of students with IDDs into a non-disabled environment. Recognizing that these interactions provide an opportunity for

students with IDD to practice social skills and to prepare for vocational placement, they also voiced concerns over the need for protection from negative social interactions.

ESSA continues to support the measurement of individual student progress with both the State Assessment and Alternate Assessments Aligned with Alternate Achievement Standards. However, private schools that educate students with IDDs are not required to administer state assessments nor to report assessment data to the state of Florida. While private schools may participate in the annual standardized state assessment, many do not. They are, however, required to provide an annual report of student progress to the parent, but no student progress reporting is required at the state level for students with IDDs. Panel participants agreed that, given the inconsistency in private school leadership and program standards in private school program quality, even district-wide combined data tracking among private schools could bring down the stats of reports data. This stemmed from concerns that, with no current oversight, common data reporting to a single source would merge schools with accountability practices and best practices of instruction together with those whose leadership did not practice the same standards, thereby negatively impacting and falsifying results some private schools are able to obtain. There was agreement that an IEP for students with IDDs in private schools should be identified as a means of providing an annual report of student progress to parents. While IEPs have different accountability measures attached to them than the standards of the FSA and FSAA, their implementation propels private schools in the direction of becoming accountable for data to measure student progress. Additional research is warranted with a focus on measurement of progress for students with IDDs in a private school setting. Participation in the FSA or FSAA may be an appropriate measure of student progress if private school

curriculum supports instruction of state standards. Panelists did identify that the need for an appropriate curriculum is critical. Including curriculum purchases and up to date materials was one area which panelists stated was a concern in private schools. It was noted that panelists had knowledge of private schools which use outdated curriculum and printouts rather than standards based educational programming. It was determined by the panelists that curriculum should be developmentally appropriate, provide for varied instructional models and supports, allow for professional development on assessment and data collection, encompass a community based vocational training program, teach social communication skills and provide inclusive opportunities to practice using those social skills. Other accountability measures warranting additional research include the identification of policies and procedures for the provision of support services to support admission of students with IDDs accepted in private schools. Several of the participants in the study indicated that private schools should not enroll students they are unable to serve, but there are no universal state guidelines to protect students which private schools determine do not meet criteria after enrollment.

The standards set by the WWC for research-based practices were focused on the validity within a study rather than the possibility it would be replicated. The purpose of this research was to present evidence-based practices which have been previously identified in public school special education and gain consensus from experts who acknowledge their validity in private school education of students with IDDs. In addition to promoting EBPs, the Council for Exceptional Children partnered with the Collaboration for Effective Educator Development, Accountability and Reform to develop and published a set of High Leverage Practices (HLPs) for special educators (CEC and CEEDAR, 2017). These HLPs were integrated

into recommended practices for inclusion in the final recommendations of this study for fundamental standards to be presented for voluntary private school implementation. While some identified practices in this study were evidence-based, others would be defined as recommended practices which were not research grounded by the WWC, such as providing social activities with students without disabilities and providing a transition curriculum for vocational training. There was inconsistency in identifying best practices which matched the WWC definition of evidence-based. For the purpose of inclusion in the final recommendations, identified practices are referenced as recommended fundamental standards of practice which may serve as essential components of accountability.

Limitations

The major limitations of this study consisted of the small sampling and a limited selection of school leaders with expertise in serving specifically students with IDDs. Another limitation of this study was the recognized variation in backgrounds of participants, though all were experts within their own rights and matched the definition to be included in the study. Each panelist met expert criteria as identified in this study and had years of experience in special education and administration, yet there were inconsistencies with the professional knowledge for research based and evidence based practices as they should be applied to private school leadership and implementation. Varying backgrounds and perspectives impacted expert beliefs to reflect a narrowing response from their own experiences rather than research based ideas and not from the general application to all private schools serving students with IDDs. An increased number of participants may have given greater validity to the results, but participating panelists were able to reach consensus on the final fundamental practices which were recommended with the

understanding that the recommendations were voluntary and, at this time, there was not agency to assure their implementation.

Lastly, a limitation of this study may have been failure to establish a unified understanding of accountability. Roach (2002) outlined the definition of accountability as a multifaceted system which focused on student performance and the process of teaching and learning for all students, stating that their should be sanctions applied to schools and localities. Van Dunk and Dickman (2003) recommended accountability through transparency by making common reliable data from all schools participating in voucher programs available to parents and policymakers. Ford (2016) stated that perceptions of accountability influence the behaviors and policy preference of school leaders. These varying perceptions and background experiences may have impacted the responses to interview questions. A third research question would establish consensus of the term by identifying how private school administrators define accountability in reference to various stakeholders, including the state, parents, teachers and students. Though the Delphi research method has roots in constructing policies and procedures, the quality of responses were dependent on the participants and their knowledge base to add to the research. Although research participants were selectively recommended, a greater number of participants with equality of experience and understanding of accountability may have resulted in greater evidence based recommendations. Presentation of the interview questions prior to the interview may have given participants more time to reflect on their responses and given greater depth to the interview responses.

Recommendations for Practice

The findings of this study indicate that these fundamental standards of practice may serve as essential components of accountability for private schools serving students with IDDs. It is recommended that this resource be made available to private schools through a grassroots approach at distribution, with the support of organizations which support the accountability and ethicacy of private school practices such as Step Up for Students, the McKay Coalition and the FLDOE School Choice Office. This office manages the enrollment of private schools in state scholarship programs. It identifies all private schools that accept state scholarship funds through a school directory available on the School Choice website. Until further research is conducted to include a wider span of students with varying disabilities, these recommended practices could be an available resource through the School Choice Office website. Private schools should also be able to gain recognition form the School Choice Office as being a school designated as utilizing these identified practices and accountability measures.

The fundamental recommendations identified in this study should be on a voluntary basis and not mandated as policy, which would require state legislative changes. The recommendations are specified toward schools serving students with IDDs. Using the Delphi study allows the construct of an accountability and best practices culture which could prove a valuable resource to determining the progress of students who would otherwise be assessed using the Florida State Alternative Assessment to measure gains.

Recommendations for Policy Change

While the state of Florida maintains a relative hands-off approach to oversight of private schools, compliance with facility maintenance, state fire and safety protocol, student

attendance requirements and accountability standards such as annual financial audits, background screening and participation in annual statewide surveys and compliance reports are currently required. However, these standards do not relate to programmatic or instructional practices, nor to teacher training or development. Additional oversight of private schools receiving state voucher funds would demand a legislative change. Additional research could help to assess whether policy change is indicated to connect state funds to the implementation of fundamental standards of practice which may serve as essential components of accountability.

If warranted as a viable policy change supported by research, submission of these standards through the Florida State Advisory Committee for Special Education should be a consideration. These standards could be presented as recommendations to be offered through the Bureau of Exceptional Education and Student Services and to the FLDOE School Choice Office. If accepted by the state of Florida as a viable means of identifying accountability measures and implementing fundamental practices, additional guidance would be needed to facilitate distribution and implementation. The FLDOE School Choice Office maintains a website that identifies all schools which receive voucher funding and the type of disabilities they serve at their school. With further research, it could be recommended through the Special Education State Advisory Committee, that the FLDOE School Choice Office identify private schools that adopt and abide by these practices in order to assist parents in the selection of private school which elect to utilize high levels of accountability and standards of practices. These schools could have a designation in the FLDOE School Choice directory to differentiate them as a high-quality program which supports recommended accountability measures and fundamental standards of practice. Any further mandate of these recommendations

would require legislative change and contests Florida's definition of private school regulation, specifically that it is not legislative intent to regulate, control, approve or accredit private educational institutions. Without legislative support, this research is dependent on the State Advisory Committee, Step Up for Students or the McKay Scholarship Coalitions to promote its implementation. Case studies of schools which implement the recommendations would provide data to support the validity of legislative changes. It is suggested that further research would conduct these case studies to determine their effective changes on private school accountability measures and fundamental standards of practice.

Recommendations for Future Research

Further research needs to be conducted to determine the limitations of these recommended fundamental standards of practice. The state of Florida indicates through state regulations that they will not mandate private school policy or impact jurisdiction over private schools. Private schools for students who do not have an IDD diagnosis are still not required to participate in the FSA. They are asked to submit results of standardized assessments to the Florida Learning Institute, but that data is not included in state reported student progress statistics. Future research could determine whether it is appropriate to generalize these practices to all private schools serving students with disabilities, not only those with students who have IDDs.

Future case studies could analyze whether schools that implement the recommended fundamental practices demonstrate greater student gains and teacher development than they did prior to implementation. These results could impact the direction of policy for schools who use these practices, as well as schools who do not implement them.

Conclusion

This study served to fill a gap in the research which had not addressed instructional and programmatic practices utilized in private school instruction of students with IDDs. While existing research indicates a lack of accountability in private schools regarding student progress and measures of teacher training, Florida's school voucher program continues to gain momentum. There was no research found which established that practices which were identified as evidence based in public school could be assumed to be as effective in private schools, without consideration of leadership, teacher training and development.

Findings of this study revealed that expert private school administrators identified evidence based and high leverage practices as a means for increasing accountability in operational and programmatic decisions related to special education for students with IDDs. Research questions which may stem from this study include "What are the leadership credentials and characteristics of private school administrators who promote high quality accountability measures and best practices for private special education programs without mandated legislation?" and "How is accountability represented to identified stakeholders in private schools serving students with disabilities?". Additional research is needed to assess areas of the policy framework in greater detail to determine whether legislative changes should be recommended which would link these fundamental standards of practice to the assignment of schools which are allocated state funds to support the education of students with IDDs. The identification of these standards is a starting point to initiate resources and competency in programming and will most likely, remain at a voluntary implementation phase, unless these standards of practice are integrated into state requirements. Without legal implications, the

resulting guidance is simply recommendations subject to the ethical standards of individual private school administrators. Even so, these practices may have significant impact at a grass roots level to differentiate program quality from those who choose not to implement them. Lastly, research may be expanded by implementing the recommended fundamental practices using a different research method such as a case study. By conducting a case study, the research could include observations on how the private school administrators implement the recommendations through the policy framework. A groundwork for recommended fundamental practices which establish measures of accountability has been determined through this research.

The focus of this study was on the operative culture in private schools as it applies to the use of best practices to sustain accountability in the education of students with intellectual differences. It could be said that these practices were intended to support a recommended system of beliefs, attitudes and practices toward the education of this population. The resulting recommendations are foundational for further research which may generalize findings to a wider range of private schools serving students with disabilities. Expanded research may set the stage for potential policy change which identifies these fundamental practices and accountability measures as qualifications of schools to receive state funds through the McKay and Gardiner Scholarship programs and similar programs in other states.

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APPENDIX A: INTERVIEW QUESTIONS

Background:

1. How long have you been an administrator in a private school and what are the reasons you believe it is an appropriate placement for students with special needs?
2. Can you describe a typical student with special needs who attends your program?

School Culture of Accountability:

3. What processes do you have in place to exhibit accountability to the parents, students and staff?
4. What evidence based practices are included in your school's accountability practices?
5. Does IDEA or school choice influence your school's accountability plans? Should IDEA philosophy be considered in private schools?
6. How are you using fiscal and human resources to influence student-centered, high quality instruction in your private school serving students with special needs?
7. How do your school policies influence accountability in addressing the requirements of serving students with special needs and their families?
8. What is your practice for providing professional development on accountability practices in your school and do you have a model and evaluate teacher adherence to those practices?
9. What other things or events have been influential in shaping accountability in private schools serving students with intellectual differences?

School Culture of Best Practices

10. What is your philosophy on the development of IEPs in private schools for students who have significant special education needs as stipulated in the Individuals with Disabilities Education act?
11. How does your school culture influence the use of best practices in meeting the requirements of students with special needs and their families?
12. What is your practice for providing professional development on best practices in special education and do you have a model to coach and evaluate teacher adherence to those practices?
13. How does your school provide opportunities for teacher collaboration and decision-making regarding instructional planning, student academic and behavioral reflections and data driven interventions? What are your practices for teacher coaching and evaluation?

Practices for Social and Vocational Inclusion

14. At your school, how are opportunities for non-academic, age appropriate activities developed to allow for inclusive social development with same age neurotypical peers? Why are these activities important?
15. At your school, how are opportunities for vocational training skills implemented with non-disabled individuals?
16. Are there other practices that are important to your school that I forgot to ask about?

APPENDIX B: INTERVIEW COVER SHEET

Date: _____ School Location: _____

Name: _____

Background Information:

Age Group	36-45
	46-55
	56-65
Highest Level of Education	Bachelor's Degree
	Master's Degree
	Doctorate
Years in Administration	5
	Greater than 5 but less than 10 years
	Greater than 10 years
Professional Background	General Education
	Special Education
	Both General Education and Special Education
Setting	Private School
	Public School
	Both Public and Private School

Panelist Definitions:

Student population:

Definition of accountability:

Definition of best practices:

Noted concerns with the study:

APPENDIX C: RECOMMENDED STANDARDS OF ACCOUNTABILITY MEASURES AND BEST PRACTICES FOR PRIVATE SCHOOLS SERVING STUDENTS WITH INTELLECTUAL AND DEVELOPMENTAL DISABILITIES

The following are recommended standards of operation for private schools serving students with intellectual and developmental disabilities. The resulting consensus is from a Delphi study incorporating experts in the field of private school special education of students with intellectual and developmental disabilities. These recommended standards follow a policy framework and are as follows:

I. Accountability:

- Admissions Process: Private schools shall have an admissions process which allows for acceptance of students which match set criteria for curriculum, personnel and support services which provide student progress.
- Staff Background Checks: Any staff or volunteers who will have direct contact with students will undergo a state and national background screening with the Florida Department of Law Enforcement.
- In the absence of accreditation by an outside agency, private schools will maintain written policies and procedures to reflect standards for operational and programmatic processes to include:

    vii. The school will maintain individual student records which reflect student evaluations, individualized educational programs which identify specified goals and objectives; data to document student progress; documentation of parent involvement in educational planning; documentation of behavioral

and academic interventions as needed; curriculum options which match state access points for demonstrated credit toward graduation.

viii. The school has a curriculum that is developmentally appropriate and provides opportunities which meet the intellectual, emotional, physical, and social needs of its students. The curriculum is data driven to demonstrate mastery of learning goals, and objectives, and includes age appropriate instruction at the student's developmental level for academic, social, behavioral, life management, and career independence.

ix. The school has access to additional educational support services identified in a student's diagnostic evaluation or documents disclosure to families that such services are unavailable as part of the student's educational plan in the private sector.

x. The school's non-academic programs encourage opportunities for social activities which are inclusive of students both with and without disabilities, utilizing these opportunities to educate the community regarding acceptance and inclusion of students with disabilities in all areas.

xi. The school commits to the employment of faculty, administration and staff who exhibit qualifications for their specific roles and responsibilities based on their education, training, and/or professional experience.

xii. The school demonstrates commitment to teacher professional development and growth through demonstrated opportunities for consistent coaching, mentoring and professional development training.

- Implementation of IDEA Standards for Students with Disabilities: while private schools are unable to meet the requirements of IDEA as established in federal law, there is a commitment to meet the standards to the best of the private school's ability.

vii. schools can utilize state scholarship funds to develop an appropriate educational plan as developed by the school personnel and agreed upon by the parent/guardian.

viii. Evaluation: IDEA requires that a child receives an evaluation implemented by a team of knowledgeable and trained evaluators. Private schools will collaborate with local education agencies (LEA) to refer students for evaluation and to maintain accountability with the LEA in the utilization of proportionate share funds to provide materials and support services as indicated through the evaluative process.

ix. Individual Education Plan: Private schools will produce individual education plans which outline a student's academic, developmental, and functional needs. The plan will present levels of educational performance, annual goals and benchmarking objectives, and supplementary services to be provided, if applicable.

x. LRE: The private school agrees to educate parents regarding the educational environment and that this is a parent decision, not the recommendation of the LEA.

xi. Parent Participation: The private school agrees to the inclusion of parent/guardian as an equal participant and decision maker in the student's educational evaluation, planning, and programming.

xii. Procedural Safeguards: While parents relinquish their right to due process in a private school setting, the private school agrees to disclose to the parent/guardian all information pertaining to the educational records of their child and give advance notice regarding evaluations, or concerns regarding the student's placement.

- The private school will use appropriate methods to collect data to drive school improvement decisions.

II. Assessment:

- Individual Education Plan: Private schools should produce individual education plans which outline a student's academic, developmental, and functional needs. The plan should present levels of educational performance, annual goals and benchmarking objectives, and supplementary services to be provided, if applicable. Goals and objectives will be measured through data collection from formal and informal documentation to demonstrate student progress.
- Data Driven Assessment: Private schools will utilize data driven assessments to establish knowledge of student abilities and progress.

- Professional Development on Assessments and Data Collection: Staff training on assessment and data collection will be provided through recurring professional development either onsite or in collaboration with the LEA.
- Parents are provided with a minimum of quarterly reports regarding student progress.

III. Curriculum:

- The school has a curriculum that is developmentally appropriate and provides opportunities which meet the intellectual, emotional, physical, and social needs of its students. The curriculum is data driven to demonstrate mastery of learning goals, and objectives, and includes age appropriate instruction at the student's developmental level for academic, social, behavioral, life management, and career independence.
- Curriculum allows for a variety of instructional models and therapeutic supports within the classroom to address the needs of the whole child.
- Transition curriculum allows for community based vocational training to be integrated into volunteer employment experiences.
- Social programs are developed to provide students inclusive opportunities to practice and implement social skills with students without disabilities.

IV. Funding:

- Existing state financial accountability measures in place are merited.
- Community resources should be sought to offset operational expenses and to integrate the school's mission within the community, establishing acceptance of individuals with intellectual and developmental disabilities.
- Annual fiscal audit should be provided to the State.

V. Governance:

- School policies are set in compliance with state accountability measures and in support of special education standards
- Administration creates a known culture of collaboration and high expectations, coaching, individualized teacher support and professional development. They provide and support individual and collaborative planning among staff. The culture supports student and teacher progress.

VI. Personnel Training and Development:

- Teachers are provided with opportunities for purposeful individual and collaborative planning.
- Special education teachers are provided coaching on the IEP writing process.
- Credentialing standards for certification should be considered in the teacher evaluative process.
- Teachers are provided professional development training to gain knowledge and skills in high leverage practices as outlined by the CEC and CEEDAR (2017):

Collaboration High-Leverage Practices

1. Collaborate with professionals to increase student success.
2. Organize and facilitate effective meetings with professionals and families.
3. Collaborate with families to support student learning and secure needed services.

Assessment High-Leverage Practices

4. Use multiple sources of information to develop a comprehensive understanding of a student's strengths and needs.

5. Interpret and communicate assessment information with stakeholders to collaboratively design and implement educational programs.
6. Use student assessment data, analyze instructional practices, and make necessary adjustments that improve student outcomes.

c. Social/Emotional/Behavioral High-Leverage Practices

1. Establish a consistent, organized, and respectful learning environment.

2. Provide positive and constructive feedback to guide students' learning and behavior.

3. Teach social behaviors.

4. Conduct functional behavioral assessments to develop individual student behavior support plans. Provide additional professional training on positive behavior reinforcement to support teacher implementation of behavior support plans.

Instruction High-Leverage Practices

8. Identify and prioritize long- and short-term learning goals.
9. Systematically design instruction toward a specific learning goal.
10. Adapt curriculum tasks and materials for specific learning goals.
11. Teach cognitive and metacognitive strategies to support learning and independence.
12. Provide scaffolded supports.
13. Use explicit instruction.
14. Use flexible grouping.

8. Use strategies to promote active student engagement.

9. Use assistive and instructional technologies.

10. Teach students to maintain and generalize new learning across time and settings.

11. Provide intensive instruction.

12. Provide positive and constructive feedback to guide students' learning and behavior.