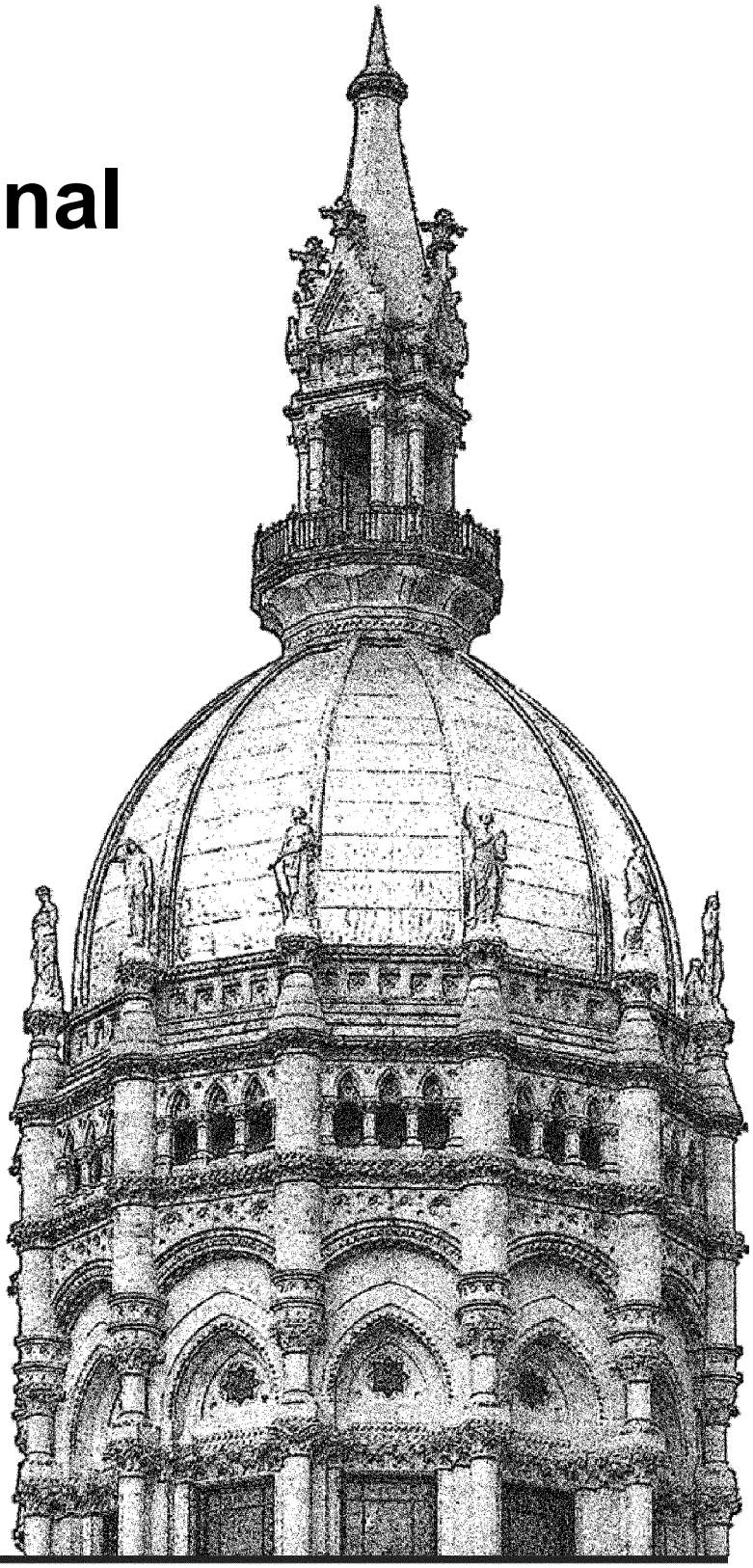
School Paraprofessional Staffing

December 2014



PRI

Legislative Program Review and Investigations Committee

Connecticut General Assembly

CONNECTICUT GENERAL ASSEMBLY
LEGISLATIVE PROGRAM REVIEW AND INVESTIGATIONS COMMITTEE

The Legislative Program Review and Investigations Committee is a bipartisan statutory committee of the Connecticut General Assembly. It was established in 1972 to evaluate the efficiency, effectiveness, and statutory compliance of selected state agencies and programs, recommending remedies where needed. In 1975, the General Assembly expanded the committee's function to include investigations, and in 1985, the committee was given authority to raise and report bills. In 1977, the committee also acquired responsibility for "sunset" (automatic program termination) performance reviews. The state's sunset law, however, was amended in 2012; PRI is still involved, but the legislature's subject matter committees have roles as well.

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LEGISLATIVE PROGRAM REVIEW
& INVESTIGATIONS COMMITTEE

School Paraprofessional Staffing

DECEMBER 2014

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PRI Findings and Recommendation Highlights

December 2014

School Paraprofessional Staffing

Background

The program review (PRI) committee approved a study of school paraprofessional staffing in May 2014. The study was requested by the Connecticut chapter of American Federation of Teachers (AFT), which represents a great number of paras in many Connecticut school districts. AFT and others have raised the issue that districts may be using school paraprofessionals in ways that render paras unable to effectively perform their core duties, including duties that are required by special education students' individualized education programs.

The PRI study's focus is on instructional paraprofessional staffing policies and practices in Connecticut K-12 public schools. The study examined the numbers of paras working in school districts and the duties and functions they perform, finding wide variation among districts.

It may be that paraprofessionals are being used as substitutes for classroom coverage; CSDE does little monitoring of the adequacy of numbers and qualifications of substitute teachers in individual districts.

Connecticut paraprofessionals are not certified, and only paras working in schools or programs that receive federal Title I funds must meet federal qualifications. While many districts and schools use the Title I standards, CSDE does not maintain data on the number of paras that meet the standards, even in Title I districts.

In 2006, PRI conducted a study of paraprofessionals focusing on the issues of qualifications and certification. While credentialing of paraprofessionals was not a major focus, the current study examined professional development opportunities for paras and found that there are many training programs available, but paid time off from regular duties to attend is an issue. The study also explored ways to recognize paraprofessionals and the valuable contributions they make.

Main Findings

There about **14,450 FTE paraprofessionals** or non-certified instructional staff (NCIS) in Connecticut; **about two-thirds work in special education**.

There has been an **increase of about 13 percent in the number of paraprofessionals** over the past decade; much of the expansion has been linked to two federal laws – No Child Left Behind (NCLB) and the Individuals with Disabilities Education Act (IDEA).

Most school districts are unionized, but determining how many paraprofessionals are covered by collective bargaining agreements is difficult because of the many different job titles and variation in hours worked. Unionized paraprofessionals are covered by the Municipal Employees Relations Act (MERA), **but few grievances or complaints regarding paraprofessionals** reach the State Board of Mediation and Arbitration or State Board of Labor Relations.

Paraprofessionals are not highly compensated. According to the Bureau of Labor Statistics, the average annual compensation of a Teacher's Aide is about 42 percent of the average salary paid to an elementary school teacher.

There is some **research suggesting that paras can be utilized in ways that contribute to positive student outcomes.**

CSDE is required to monitor the implementation of **special education services in Connecticut, but one of the key complaint processes is not widely publicized.**

Districts may not be writing IEPs with specificity, making it difficult to determine whether an IEP is being implemented appropriately.

Many collective bargaining agreements include provisions relating to professional development, but there is **no statewide mandate for minimal training before assumption of paraprofessional job duties.**

PRI Recommendations

The report contains 11 recommendations most aimed at improving CSDE's oversight of special education services through technical assistance, focused monitoring, and its administrative complaint process. One such recommendation is that CSDE should more closely monitor the number and qualifications of districts' substitute teachers so it will be less likely that paras will be used inappropriately for classroom teacher coverage.

Another recommendation is to require school districts to provide at least three hours of training to paras before they begin their duties.

There is also a set of recommendations focusing on the Paraprofessional Advisory Council's membership, leadership, and staff support.

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Glossary

Paraprofessional Staffing Study

Applied Behavior Analysis **ABA**	A form of behavior therapy often used to treat individuals with Autism Spectrum Disorder in which environmental stimuli are manipulated in order to produce a desired response. By breaking complex skills into small steps, individuals can systematically learn to respond and behave in socially appropriate ways.
Bargaining Unit **BU**	A group of employees recognized by the employer as sharing common interests for purposes of collective bargaining and represented by a labor union.
Bureau of Labor Statistics **BLS**	Federal government agency which collects and publishes data about labor economics, including wages paid by job classification.
Capitol Region Educational Council **CREC**	The RESC serving the greater Hartford area.
Collective Bargaining Agreement **CBA**	Negotiated contract between a bargaining unit of employees and the employer.
Connecticut State Department of Education **CSDE**	Agency acting as the State Education Authority in Connecticut.
District Reference Groups **DRG**	CSDE's categorization of all public school districts in the state into nine groups, based on characteristics like income and education.
Due Process	Parents of students receiving services pursuant to IDEA may disagree with the LEA about the appropriateness of an IEP. When this is the case, IDEA provides for a dispute resolution process, implemented and overseen by the SEA, which can culminate in a due process hearing before an impartial hearing officer whose final decision can be appealed to state or federal court.
Educational or Instructional Paraprofessional	Term used to distinguish paraprofessionals working with students as part of the instructional process from those who might work in schools in capacities where such interaction is not required (e.g., custodians, bus drivers, secretaries).
Elementary and Secondary Education Act **ESEA, Title I**	Initially enacted in 1965, federal law intended to direct resources at ensuring quality educational services to all U.S. students. Title I specifically targets funds to schools in which a high percentage of students are from low income families.

Free and Appropriate Public Education **FAPE**	The central articulated right of each child with a disability pursuant to IDEA. An education provided, at public expense, to meet the individual needs of each student with disabilities.
Full Time Employees **FTEs**	Typically reported as a count of all full time positions of a certain kind, as distinguished from a count of individuals holding that kind of position.
Guidelines for Training and Support of Paraprofessionals	Manual promulgated by CSDE in 2012 to assist districts in ensuring that requirements of both Title I and IDEA were met in terms of the hiring, supervision, evaluation and use of paraprofessionals in Connecticut schools.
Highly qualified	Means that instructional staff person meets qualifications for position (either teacher or paraprofessional) outlined in federal law for either Title I or IDEA.
Inclusion	The concept that students with disabilities should be integrated with their non-disabled peers; also referred to as mainstreaming.
Individualized Education Program **IEP**	The annual individualized plan developed by PPT for each student identified as requiring special education pursuant to IDEA.
Individuals with Disabilities Education Act **IDEA**	A federal law that establishes the rights of all children with disabilities to receive a free, appropriate public education in the least restrictive environment.
Instructional Staff	Includes both certified teachers and non-certified instructional staff.
Least Restrictive Environment **LRE**	Further right of each child with a disability pursuant to IDEA to receive FAPE in the environment most closely resembling the environment he or she would receive education in the absence of any disability.
Local Education Authority **LEA**	A public or private entity providing public education services to students from one or more municipalities.
Municipal Employee Relations Act **MERA**	State law (Conn. Gen. Stat. § 7-467 et seq.) governing the relationship between municipal employers and employees.
No Child Left Behind Act **NCLB**	Most recent (2002) reauthorization of Title I of the ESEA. Provides direct guidance as to qualifications and roles for paraprofessionals.
Non-Certified Instructional Staff **NCIS**	Set of SDE categories for non-certified school employees who work in supporting direct instruction to students.
Office of Civil Rights **OCR**	Office within the USDOE responsible for hearing complaints of violations of Section 504 of the Rehabilitation Act.
Office of Special Education Programs **OSEP**	Office within USDOE responsible for ensuring states are implementing federal special education law - IDEA

ParaPro Assessment	An assessment that must be passed to satisfy requirements of Title I (and many school districts) if a person seeking employment as a paraprofessional does not have the equivalent of two years of college credits.
Paraprofessional	A non-certified school employee who either works with students or provides other support services within the school environment. Term may include both instructional and non-instructional paraprofessionals.
Planning and Placement Team **PPT**	A group of individuals including parents, teachers, school administrators, the student if over age 14, and others with knowledge about the student who together determine the specific educational needs of the student. The team develops, reviews, and revises the student's IEP. This includes determining the environment(s) in which education will take place and the staff supports needed.
Professional Development **PD**	Pre-service or in-service training offered to both certified and non-certified school staff to increase capacity to provide effective educational services.
Regional Education Service Centers **RESCs**	Public education agencies whose purpose is to provide programs and services to support and benefit collaborating groups of public school districts. Connecticut's six RESCs offer many different types of services and run magnet and special education schools throughout the state.
Response to Intervention **RtI**	A framework of assessment and intervention to identify students struggling with basic skills and provide evidence based intervention while monitoring progress in order to discontinue intervention when no longer necessary or provide more intensive intervention if initial interventions do not result in improved performance.
Restraint and Seclusion **R/S**	The physical restraint of a student to prevent serious injury of self or others and the placement of the student in an environment away from other students. Restraint and/or seclusion are most often employed in connection with students who manifest disruptive and dangerous behaviors.
School District	Includes not only municipal and regional school districts, but also charter schools, RESCs, and some others entities providing public education.
School Paraprofessional Advisory Council	Established by the legislature in 2007. Currently consists of 19 members, meets quarterly, submits recommendations to the Commissioner of Education as to training needs and effectiveness of training of paraprofessionals, and provides reports to the General Assembly.

Scientific Research Based Intervention **SRBI**	Connecticut's term for its approach to RtI. Requires all struggling students, whether or not identified as in need of special education, to receive targeted research based intervention to support learning basic skills and the collection of data to demonstrate either successful remediation or the need to provide more intensive/individualized research based intervention.
Section 504 of the Rehabilitation Act	A statute ensuring equal access to programs receiving federal funds, including schools, for individuals with disabilities. Compliance with Section 504 is overseen by the USDOE's Office of Civil Rights.
Service Categories	Pursuant to the federal IDEA, states are required to track pursuant to which of 12 possible service categories a child with disabilities receives services. Identification of a service category for purposes of IDEA is not equivalent to receiving a medical diagnosis.
Special Education	The provision of education and related services to students with disabilities pursuant to either the IDEA or Section 504.
State Board of Labor Relations **SBLR**	Subdivision of the Connecticut Department of Labor which oversees the collective bargaining relationship between municipal employers and employee bargaining groups. This includes hearing complaints of violations of various provisions of the Municipal Employee Relations Act (MERA).
State Board of Mediation and Arbitration **SBMA**	Subdivision of the Connecticut Department of Labor which oversees the development and enforcement of collective bargaining agreements (CBAs) between municipal employers and employee bargaining groups. This includes both assisting in the negotiation of CBAs and hearing grievances involving alleged violations of CBAs.
State Education Authority **SEA**	The state agency with responsibility for receiving and distributing federal education funds to LEAs, as well as monitoring compliance with applicable federal law and collecting data to report to federal government. In Connecticut it is the SDE.
State Education Resource Center **SERC**	A quasi-public agency that is funded almost entirely by the CSDE to provide professional development opportunities and disseminate information and resources about research-based and best practices.
Teacher/Instructional Aide/Assistant **TA, IA**	Most often used as a synonym for instructional paraprofessional or non-certified instructional staff.

Time with non-disabled peers TWNDP	A metric for inclusion recorded as the percentage of time a student with disabilities spends with students who do not have disabilities as compared to time spent in separate settings.
Title I	See: Elementary and Secondary Education Act.
Transition	There are two periods that can be referred to a "transition" in the context of special education. If a child with disabilities is between the age of 3 and 5, inclusive, he or she is entitled to a FAPE in the LRE, although for children without disabilities the right to public education does not attach until age 6. At the other end of the public education process, IDEA provides that students with disabilities may remain entitled to services to develop skills for transition to independent living even after completing the academic requirements for a high school diploma. Students receiving such post-high school transition services may be referred to as in a "5th year of high school" program.
University Center for Excellence in Developmental Disabilities UCEDD	A center associated with the University of Connecticut Health Center. It is part of a national network of such centers, which conduct research and disseminate knowledge about ways in which to improve the quality of life for individuals with developmental disabilities and their families.
Workers Compensation WC	System of monitoring and providing benefits to employees injured in the course of employment.

Executive Summary

School Paraprofessional Staffing

In June 2014, the Program Review and Investigations Committee voted to conduct a study of school paraprofessional staffing in Connecticut, specifically how these persons are being utilized in Connecticut K-12 public schools. The study was based on a request of the Connecticut Chapter of the American Federation of Teachers, which represents paraprofessionals in many Connecticut school districts. Union members and others have raised the issue that districts may be assigning school paraprofessionals in ways that render paras unable to effectively perform their core duties including those required by special education students through their individualized education plans (IEPs).

There were 14,450 non-certified instructional staff (NCIS) working in Connecticut in 2013. This was an increase of about 13 percent from a decade earlier but a decrease of 2 percent from the highest number of 14,741 in 2010. In Connecticut, paraprofessionals are not required to be certified, as they are in some states. While no state-required minimal standards are in place, there are federal requirements on what qualifications a paraprofessional must have if the district or school receives certain federal education funding.

Paraprofessionals may go by many different job titles – paraprofessional, paraeducator, tutor, aide, teacher assistant, and behavioral technician – to name a few. Similarly the duties paras perform are varied, from general classroom duties, to providing library/media support, to assisting one or more students with disabilities. The role of paraprofessional has evolved over the decades, and much of that has been in response to changing federal laws. The No Child Left Behind (NCLB) Act is the most recent of a series of laws designed to improve academic achievement for all students. That act requires that students, especially those from low-income backgrounds, are receiving instruction from highly qualified individuals, including instructional paraprofessionals.

Another federal law, the Individuals with Disabilities Education Act (IDEA) has perhaps had an even greater impact on the use of paraprofessionals in schools. That act requires that students with disabilities receive a free and appropriate public education in the least restrictive environment, spending as much time as possible with their non-disabled peers. As districts seek to implement that law, they often use paraprofessionals to assist students with disabilities, in general or special education settings.

PRI found that the inclusion rate of special education students in Connecticut has always exceeded the national average. In the year 2000, Connecticut was already including almost 60 percent of students with disabilities in general education classes with their non-disabled peers 80 percent of the time or more. Nationwide, that 60 percent level was reached only in 2010, a full decade later. By that time, Connecticut was including 73 percent of students with disabilities in classes with non-disabled peers at least 80 percent of the time.

As the inclusion rate was increasing in Connecticut, the number of special education paraprofessionals grew at an even faster pace. Indeed, that number of FTE special education

paras doubled from almost 4,500 in 2005 to over 9,000 in 2010. In 2,012, 67 percent of all instructional paraprofessionals were assigned to special education. It must be noted, however, that because of how para assignments must be reported to CSDE, while a paraprofessional may be designated as working in special education, that does not mean that she does not also support general education students as well.

Paraprofessionals in Connecticut are, on the whole, not highly compensated. While many paraprofessionals are unionized, the average annual compensation of $29,230 is less than half the average $68,580 paid to teachers in Connecticut. Education funding in Connecticut has been fairly flat over the past few years, increasing about 1.9 percent annually, before adjusting for inflation. As a result, local districts have been looking to cut their budgets. Some districts have trimmed the number of paraprofessionals, but overall the statewide number of FTE paras has stayed fairly constant. A different situation exists with certified teachers where the number employed in Connecticut public schools has dropped by almost 5,000, or 10 percent, since 2008-09. While this, to some extent, dispels the myth that paraprofessionals positions are being cut to reduce school budgets, it may well be that districts are reducing hours of paraprofessionals, and/or only hiring part-time paras. No data on the number of full-time versus part-time paras exists, and while PRI staff surveyed districts to collect that information, because of a fairly low response rate, it is difficult to reach any definite conclusions from the results.

Many of the collective bargaining agreements (CBAs) covering unionized paras include stipends for extra duties, like feeding, toileting or diapering, or other student personal care. Other CBAs offered these lump sum bonuses for specialized training or possessing advanced education or credits. Almost all CBAs offered some type of longevity bonus for staff who had been employed with the district for a long time, which may help with paraprofessional retention. In terms of filling vacancies, districts reported to CSDE that, of positions available at the beginning of the school year, only 12 percent were still unfilled at the beginning of October.

PRI compared the ratios of students to certified and noncertified staff among districts and district reference groups (DRGs), CSDE's categorization of districts into nine groupings that share similar socio-economic characteristics. One metric where there was little variation was the number of special education paraprofessionals per special education teacher. The statewide ratio was 2:1, but the range among the DRGs was from a ratio of 1.3 special education paras per special education teachers in DRG I to a ratio of 2.2:1 in in DRGs C and F. This is important as it indicates that for the most part special education teachers do not have great numbers of paras to supervise in addition to their students.

While Connecticut has no statewide mandates for general class size, 27 states have established such standards, and 16 of those states include non-certified staff as factors in the ratios (e.g., the class size could be adjusted upward if an aide is present). However, standards for special education staffing are much more difficult to set given the range of complexity of student needs, and other factors. PRI found that while states may require these factors to be considered when staffing for special education, the study found no ratios that could be used as a gauge to measure district staffing of paraprofessionals. While there was considerable variation in Connecticut's DRGs in special education staff metrics, a higher metric in one area may be offset by a lower metric in another. For example, DRG I had a much higher number of special

education students to paraprofessionals than the statewide average, but lower ratios of both special education students and all students to certified special education teachers.

PRI's review of the general literature on student outcomes and use of paraprofessionals revealed:

- Fairly strong evidence that, when appropriately trained and supported to deliver research-based interventions, paraprofessionals are effective at improving student performance, particularly in literacy programs in the early elementary years.

- No evidence that assignment of paraprofessionals to assist in general education classrooms leads to improved outcomes for all students or for students with disabilities generally.

- Some evidence that the presence of paraprofessionals in both general education classrooms and special education classrooms can result in more teacher time being spent on instruction, more student time-on-task, and increased interaction between students with disabilities and their non-disabled peers.

There is really no data available to conduct an in-depth investigation of the impact paraprofessionals have on student achievement in Connecticut schools. Nor is there any agreement as to what outcomes may logically relate to the use of paraprofessionals in all school districts, given the difficulty in knowing exactly what all, or even most, paraprofessionals do in each school district. Nevertheless, PRI looked for correlations between paraprofessionals in a district – as measured by the number of students per paraprofessional – to broad student outcomes like graduation rates, test scores at various grade levels, and chronic student absenteeism. The results showed a single small significant correlation – more students per paraprofessional correlated with a higher district-wide chronic absentee rate. What this demonstrates, in concert with the lack of correlation with any other variable tested, is that most measures of student performance are more likely to be linked to other factors, such as those factors that already control assignment to Connecticut's school district reference groups.

Through a review of public reports CSDE and individual school districts have issued relating to the delivery of special education and related services, PRI found that several districts have written individualized educational programs (IEPs) using vague language to describe paraprofessional support. Non-specific reference to "adult support" or providing paraprofessional support "as needed" makes it difficult to monitor IEP implementation. PRI recommends that CSDE take steps to reduce the frequency with which this occurs. PRI also found that paraprofessionals may not be adequately informed or trained in what supports a student needs in an IEP. Thus, PRI recommends that all districts be required to provide at least three hours of training before the start of the school year.

PRI found that there are a number of ways that paraprofessionals can express or assert concerns that they are being used inappropriately. First, there is an administrative complaint process within CSDE's Bureau of Special Education where paraprofessionals can lodge a complaint if they believe a student's IEP is not being followed. Second, there are processes in place for paraprofessionals to file labor grievances or complaints around management practices,

such as when they believe a district is violating their collective bargaining agreement or is failing to bargain over the impact management decisions have on conditions of their employment. While it may be that paraprofessionals are reluctant to pursue either complaint process for fear of retaliation, there are both contractual and legal prohibitions adequate to protect against such retribution.

PRI found that because paraprofessionals are not certified, and because there are no state mandates on minimal requirements, CSDE does not have reliable information on what educational qualifications paraprofessionals possess in Connecticut. PRI also found that CSDE does not exercise sufficient oversight of: 1) district use of substitute teachers; 2) whether districts have an adequate number of substitutes; or 3) whether the substitutes possess the minimum requirement of a bachelor's degree or have obtained a CSDE-waiver if they do not. If districts do not have adequate numbers of substitutes with appropriate qualifications, it is more likely that districts will use inappropriately use paraprofessionals for class coverage, whether they have a degree or not.

PRI found that the state and districts have made progress in recognizing the value of paraprofessionals, including through the activities of the School Paraprofessional Advisory Council. Committee staff makes a number of recommendations pertaining to the advisory council, including a requirement for CSDE staff support, and election of a chairperson from among its members.

At its December 17, 2014, meeting the PRI committee voted to approve 11 recommendations designed to facilitate use of existing procedures to address concerns about inappropriate use of paraprofessionals, improve the job preparation of paraprofessionals, and elevate the stature of the School Paraprofessional Advisory Council. A number of recommendations are aimed at improving CSDE's role in monitoring and oversight of the use of paras in special education, ensuring that Title I requirements for paraprofessionals are being met, and that districts have adequate numbers of qualified substitute teachers. Administrative recommendations around CSDE's complaint process should improve public access to information around the complaints and disposition. The 11 recommendations are:

1. **The Department of Labor (DOL) should make all final decisions and awards of the State Board of Mediation and Arbitration and State Board of Labor Relations available online. Further, because many of matters before both boards are resolved before final decision or award, searchable summary information on all grievances and complaints should also be available on DOL's website.**

2. **The State Department of Education should collect information about Title I paraprofessionals annually, summarize the information, and post on its website. At a minimum, the posted data should include: the number of paraprofessionals covered by NCLB; the number who have not met the NCLB requirements; the number of districts out of compliance; and the types of actions taken by the districts.**

3. **The State Department of Education's focused monitoring process should include an inspection of a random sample of Individualized Educational Programs (IEPs) to**

ensure that the language outlining paraprofessional services is written with enough specificity regarding the amount of time a paraprofessional is to provide support to a student and what that support entails. This will inform the consultant team, if that district is selected for phase-three assistance, on whether IEP specificity is an issue, and if so, allow the CSDE to provide technical assistance in writing IEPs. If the IEPs do indicate specifically what and how much paraprofessional assistance is to be provided, then the in-district focused monitoring sessions should examine whether the IEPs are being followed.

4. **Regarding the Special Education Administrative Complaint Process, the State Department of Education shall:**

    - **seek to modify the state regulations pertaining to special education to include the process and procedures for filing an administrative complaint;**

    - **issue a policy brief about the availability and mechanics of the process and circulate it to organizations and groups interested in special education services, including the School Paraprofessional Advisory Council; and**

    - **make the Complaint Resolution Process, as well as the complaint form, available on its website in a manner that is easily accessible to the public.**

5. **The State Department of Education should establish a system or systems whereby one or more of the following takes place:**

    (1) all final decisions on administrative complaints are written in a way that does not reveal the identity of individual students and made available on its website in the same way as due process final decisions;

    (2) a summary table is placed on its website and updated quarterly containing information to include: (a) type of complainant (parent, agency/advocacy organization, LEA, other); (b) district or districts involved; (c) nature of complaint; (d) whether complaint is withdrawn, dismissed or going to final decision; (e) date of final decision; (f) if final decision includes findings of non-compliance the nature of the non-compliance; (g) any corrective action ordered to be taken; (h) the date upon which follow-up monitoring confirms that corrective action has been taken; and/or

    (3) interested individuals or organizations can, for a small fee, automatically receive copies of all final decisions on the merits on any administrative complaint, regardless of whether or not that complaint involves a request for due process.

6. **The State Department of Education should develop and distribute a policy brief stating that IEPs should be drafted in such a way as to clearly identify the type of employee (i.e., certified vs. non-certified) providing services and supports and explaining how to appropriately specify the frequency and duration of such services**

and supports. The brief should provide examples of both appropriate and inappropriate language and clearly indicate where in the IEP this information should appear.

7. **The State Department of Education should conduct a random audit of a sample of districts' rosters of substitute teachers and verify that each individual listed has a bachelor's degree, or that the district has a waiver for that individual. Secondly, CSDE should assess whether the number of substitutes on the roster appears adequate to meet the needs of the district, given the size, number of schools, and composition of the student body. If the roster appears inadequate, CSDE should further examine what those districts are doing to ensure adequate classroom coverage by qualified staff when teachers are absent.**

8. **To ensure at least some preparation for the requirements of paraprofessional positions, all school districts shall be required to provide a minimum of three hours of training, with pay, for all instructional paraprofessionals prior to the start of the school year. That time should be spent with the immediate supervisor of the paraprofessional, who will provide such information as necessary to educate the paraprofessional on his or her role and responsibilities and ensure full knowledge of all duties he or she will be expected to perform.**

   If paraprofessionals are hired after the start of the school year, or, if there are reassignments during the school year, the districts shall provide the same number of hours of training prior to a paraprofessional performing new duties in a classroom and/or with an individual student or students.

9. **The State Department of Education should redouble its efforts to inform districts about paraprofessionals having access to information contained in student IEPs. This could be done through reissuing the existing brief on this topic and distributing it to: all district Directors of Special Education; the Connecticut Association of Boards of Education; the Connecticut Association of Public School Administrators; the Connecticut Association of Schools; the Connecticut Council of Administrators of Special Education; parent advocacy groups; and other organizations with an interest in special education.**

10. **Regarding the School Paraprofessional Advisory Council:**

    - **The State Department of Education shall be required to provide staff support for the council and its work.**

    - **CSDE support staff should ensure that all School Paraprofessional Advisory Council meetings and agendas be posted at least 48 hours in advance of the meeting on the CSDE website for paraprofessionals.**

    - **The advisory council shall be expanded to include: two paraprofessionals who do not belong to a union; a special education teacher involved in supervising a paraprofessional; a representative of one of the higher education institutions**

offering teacher preparatory programs: and a parent who has a child who is currently receiving, or in the past has received, instructional paraprofessional support.

- **The council shall elect a chairperson from among its members, and the term of the chair should be for two years.**

- **The CSDE staff support functions should include securing a public meeting place for the council as well as posting the meeting location on the CSDE website for paraprofessionals at least 48 hours in advance of the meeting.**

- **CSDE should establish a list of current contact persons in each district who will be responsible for disseminating information to paraprofessionals in that district. The contact list should be reviewed annually by the Advisory Council and updated by CSDE.**

11. **The State Department of Education should develop individual briefs around topic areas contained in the <u>Guidelines for Training & Support of Paraprofessionals</u> and post them on CSDE's website for paraprofessionals.**

Introduction

School Paraprofessional Staffing

There were 14,450 non-certified instructional staff persons, also called paraprofessionals, working in Connecticut schools districts in 2013. This was an increase of about 13 percent from a decade earlier but a decrease of two percent from the highest number of 14,741 in 2010. In Connecticut, paraprofessionals are not required to be certified, as they are in some states. While no state-required minimal standards are in place, there are federal requirements on what qualifications a paraprofessional must have if the district or school receives certain federal education funding.

Paraprofessionals go by many different job titles. Similarly, the duties they perform are varied, from general classroom duties, to providing library/media support, to assisting one or more students with disabilities. The role of paraprofessionals has changed over the decades, from primarily mothers volunteering in their children's classroom to unionized employees working with students requiring extra assistance, especially children with disabilities. Much of the change in roles has come about as a result of federal legislation designed to improve academic achievement for all students and to ensure that children with disabilities are receiving an education in the least restrictive environment, and with their non-disabled peers.

While many are unionized, paraprofessionals in Connecticut are paid significantly less than certified teachers and school administrators. The average annual compensation for a paraprofessional is $29,230, less than half the $68,580 average compensation of elementary school teachers.

Scope of Study

In June 2014, the Legislative Program Review and Investigations Committee voted to authorize a study of School Paraprofessional Staffing. The study was based on a request by the Connecticut chapter of the American Federation of Teachers, which represents paraprofessionals (paras) in many Connecticut school districts. Union members and others have raised the issue that districts may be assigning school paraprofessionals in ways that render paras unable to effectively perform their core duties including those required by special education students in their individualized education programs (IEPs).

The focus of the study is on instructional staffing policies and practices in Connecticut K-12 public schools, and in particular examines the scope of paraprofessional responsibilities across school districts in Connecticut. The study analyzes trends in the number of school paraprofessionals, especially compared with trends regarding certified special education teachers. The study also examines efforts around professional development, including implementation of recommendations for improved training made by the School Paraprofessional Advisory Council. Several measures related to the utilization of paras and student and district performance are analyzed by district reference groups, and the study also reviews the State Department of Education's role in monitoring and overseeing how paraprofessionals are used.

Host of Competing Interests

At the outset, it must be emphasized that although education is considered primarily an issue of local concern, education generally is an area characterized by many stakeholders with many competing interest. All levels of government – federal, state and local – have involvement with local schools. It is also noteworthy that in parts of Connecticut, education is an arena in which there is a high level of intergovernmental cooperation, particularly in the areas of secondary education and special education.

Not only parents, but all citizens and taxpayers have an interest in school systems because public education plays a central role in preparing children for productive adult lives and receives a significant percentage of local, state and federal tax dollars. Within each local school system, administrators, teachers, other certified staff, and paraprofessionals themselves may all have different interests and priorities. Such interests and priorities range from the overarching contribution to the public good, to the conditions of schools as places of employment, down to the micro-level of creating positive impacts in the lives of individual students. In compiling this report, Program Review and Investigation staff attempted to include the viewpoints of all stakeholders and remain cognizant of their various, and at times competing, interests.

Concerns about Use of Paraprofessional

Throughout the research process, both as a result of interviews with a many different stakeholders and through a review of applicable research literature, a number of concerns were identified surrounding the increasing use of paraprofessionals in the delivery of educational services. Before detailing these concerns, it should be noted that, across the board, the individuals PRI staff talked to share a belief that, when used appropriately, paraprofessionals are an important part of the instructional team and can make positive contributions to student outcomes. Thus, the identified concerns should not be understood as arguments against the use of paraprofessionals in the instructional process but as caveats to guide the process of assessing whether the utilization of paraprofessionals is consistent with the short and long term goals for the individual student, class, school, district or community.

Briefly stated, the most significant and frequently identified concerns that emerged in the course of the study were as follows:

- the lack of clarity across interest groups – administrators, teachers, parents, and paraprofessionals themselves – as to what duties can and cannot be appropriately performed by paraprofessionals;

- the absence of formal requirements or standards for the qualifications, training, supervision and evaluation of paraprofessionals;

- the appearance that students with the most significant learning needs are spending the majority of their instructional time with the least educated and most poorly trained instructional staff; and

- the risk that assignment of one-to-one paraprofessionals may foster student dependence upon adults, hinder students' social development, and interfere with the process of independent learning.

Methodology

Information about school paraprofessionals and how they are being used in districts was obtained from a variety of sources. PRI staff read general literature and both professional and academic research articles around the use of paraprofessionals in educational settings. Staff reviewed federal and state statutes and regulation for requirements of and for paraprofessionals.

During the course of the study, PRI staff conducted numerous interviews with staff of various state agencies, including the State Departments of Labor and Education, and the Office of Protection and Advocacy. Staff also interviewed representatives from various associations and organizations involved in education and, in particular, special education. Those include: the Connecticut Association of Schools, the Connecticut Association of Public School Administrators, Connecticut Association of Boards of Education, and the Connecticut Council of Administrators of Special Education. PRI staff interviewed individuals at many organizations involved in professional development of paraprofessionals including: the State Education Resource Center, the Capitol Region Education Council, and the UConn University Center for Excellence in Developmental Disabilities.

In addition, committee staff met with attorneys representing districts and those representing parents in special education matters, and with staff from the Connecticut Parent Advocacy Center. PRI staff also held two small group interviews with both general and special education teachers, and spoke with administrators in several school districts. Finally, PRI staff met with a number of paraprofessionals and some of their union representatives.

Committee staff accessed and analyzed data obtained from the State Department of Education on individual district staffing, as well as district level student data on graduation rates, test scores at various grade levels, and chronic absenteeism rates.

Following the committee's update meeting and public hearing on paraprofessional utilization in late September, staff sent two surveys to each school district in Connecticut. The first was sent to each district's superintendent's office and was intended to garner specific information on various conditions of employment and the work environment, including grievances and injuries. The second survey was sent to district directors of special education, and sought information specific to paraprofessionals supporting students with disabilities, including the frequency of one-to-one (1:1) assignment of paraprofessionals to individual students and the classroom environments in which paraprofessionals work.

The need to send the surveys after the beginning of the school year, but early enough in the fall to ensure responses could be received in time for analysis prior to PRI's December meeting, contributed to a low response rate. Many districts noted that with the pressure of back-to-school activities in September and October, and the impending SDE data collection tasks of November, finding time to obtain information responsive to these surveys was challenging. Due

to the low response rate, survey results are used for illustrative purposes but do not form the basis for any findings or recommendations.

In conducting this study, committee staff also reviewed the most current collective bargaining agreements for the 143 districts whose paraprofessionals are unionized in order to summarize various provisions relating to wages, benefits, working conditions, and professional development.

Report Organization

This report contains an introduction and seven chapters. Chapter I provides background information regarding paraprofessional utilization, with an emphasis on changing roles against the backdrop of federal laws and regulations. Chapter II is a profile of the Connecticut paraprofessional workforce, focusing on economic conditions like wages and benefits. This chapter includes an explanation of the state Department of Labor oversight for unionized paraprofessionals and includes one recommendation.

Chapter III describes the many ways in which paras are utilized with analysis and comparison of staffing levels across districts using several metrics. Chapter IV contains a review of existing research into how paraprofessionals can impact student outcomes, as well as a discussion of the challenges of assessing such impacts in general and within the state of Connecticut.

The majority of the Program Review Committee's recommendations appear in Chapters V, VI, and VII. Chapter V describes the ways in which the Connecticut State Department of Education (CSDE) has oversight of issues relating to paraprofessionals. Chapter VI addresses professional development, including initial qualifications and best practices for periodic evaluation. Finally, Chapter VII discusses ways in which the value of paraprofessionals to Connecticut's schools and students can be recognized.

Chapter I

Background

> *In many ways, paraprofessionals in public schools are an enigma. Although it could be argued that their increasing numbers are an indicator of their perceived importance, as a group they may be among the most marginalized employees in schools . . . . Many paraprofessionals continue to express feelings of isolation and disrespect, fueled by low compensation and the fact that too many of them continue to be asked to assume teacher duties without adequate preparation, training, direction, or supervision.*[1]

This description of the "enigma" of paraprofessionals in public schools captures the essence of the issues in front of the Legislative Program Review and Investigations Committee in studying how paraprofessionals are being utilized in Connecticut's local and regional school districts.

Historical Context

In the United States, the modern era of paraprofessionals in elementary and secondary schools began in the 1950s. In the wake of WWII and as the first children of the baby boom entered school, there was a sudden shortage of teachers. In order to maximize the amount of time teachers were able to devote to teaching, paraprofessionals were hired to assist them with administrative and organizational tasks. In this era, paraprofessionals were most commonly referred to as "teachers' aides," and were described as "the third arm of the harried teacher."[2]

Since the 1950s, there has been a dramatic increase in the number of paraprofessionals assisting with instruction in public schools. Separate data was not kept by the U.S. Department of Education for this staffing group, called instructional aides, until the late 1960s. Federal data reflect fewer than 60,000 such staff nationwide for the 1969-70 school year. By 1980, this number was more than five times higher, with a federal count of over 325,000 instructional aides. By 2000, that number had almost doubled again, with a count for that year of over 640,000. As of 2010, federal data indicates 731,705 instructional aides nationwide. This increased number reflects both the changing legal landscape in which educational paraprofessionals are employed and the myriad ways in which paraprofessionals are utilized.

Changing Legal Landscape

The 1960s brought several pieces of federal legislation that encouraged the expansion of the ranks of educational paraprofessionals. This chapter describes the federal acts themselves and provides a summary description of the administration and implementation of the federal laws at each governmental level: federal, state and local school districts. The chapter also discusses the implications the implementation has on school paraprofessionals and their utilization.

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[1] Giangreco, M.F., and Suter, J.C. (2010). Paraprofessionals in inclusive schools: A review of recent research. *Jounral of Educational and Psychological Consultation*, 20, pp. 41-57 at pp. 50-51.

[2] Bennett, WS & Falk, RF (1970). *New careers and urban schools: A sociological study of teacher and teacher aide roles.* New York: Holt, Rinehart and Winston.

Federal law. The federal legislation included the Elementary and Secondary Education Act (PL 89-10) of 1965, the Economic Opportunity Act (PL 88-452), the Bilingual Education Act (PL100-297) and, in 1975, The Education for All Handicapped Children Act (EAHCA) now known as the Individuals with Disabilities Education Act (IDEA).

The original Elementary and Secondary Education Act (ESEA) specifically earmarked $75 million to be used to employ teacher aides in low-income areas. The 1966 amendment to the Economic Opportunity Act provided $40 million to support the development of careers for economically disadvantaged individuals. Together these two pieces of legislation created both an incentive for persons lacking an education beyond high school to seek employment, and the opportunity for them to do so in the public education system as non-certified employees.

Additional positions were created for non-certified staff with passage of two additional acts. The Bilingual Education Act (1968) motivated districts to hire paraprofessionals in order to address the shortage of bilingual teachers. The Education for All Handicapped Children Act (1975) spurred the hiring of paraprofessionals to assist with the delivery of individualized education programs for all children with disabilities. Essentially, the shortage of certified teachers for the children intended to benefit from these two acts resulted in the expansion of paraprofessional duties to include, under the supervision of a certified teacher, instructional duties in the arenas of bilingual and special education.

This expansion of paraprofessional duties into the instructional realm led to a somewhat belated realization that paraprofessionals must have some basic qualifications, undergo some sort of training, and be supervised and regulated in ways that had not been necessary when they performed primarily clerical and administrative functions. Various efforts to raise qualifications and enhance training and supervision occurred throughout the 1980s and 1990s. Yet, as the 20th century rolled into the 21st century, there was still only an emerging consensus, not yet formalized, as to what the role of a non-certified educational paraprofessional should and should not include and what duties should remain exclusively within the domain of certified teachers.[3]

New direction was given by the federal government with the passage of the No Child Left Behind (NCLB) Act in 2001. That law, amending and reauthorizing the 1965 ESEA, described a range of appropriate responsibilities and set forth specific qualifications for paraprofessionals employed in schools receiving Title I funds.[4] In short, the NCLB Act provides that a paraprofessional is any non-certified employee providing "instructional support" which includes:

- one-to-one tutoring;
- assisting with classroom management;
- providing assistance in a computer lab; library; or media center;
- assisting in parent involvement activities;
- acting as a translator; and
- providing instructional support services under the direct supervision of a highly qualified teacher.

[3] Pickett, A., Likins, M., & Wallace, T. (2003). *The Employment and Preparation of Paraeducators: The State- of-the-Art-- 2003*. New York: National Resource Center for Paraprofessionals in Education and Related Services.
[4] Generally speaking, Title I funds are provided to schools with high concentrations of low-income students.

In order to be hired or remain in such an "instructional support" position, the NCLB Act requires a paraprofessional to: (1) have a high school diploma or equivalent; and (2) either (a) have completed two years of college; (b) obtained an Associate's Degree or higher; or (c) passed a formal academic assessment.[5]

As a matter of practice, many if not most school districts currently apply these standards to all of their paraprofessionals. Technically, however, these NCLB requirements pertain only to those paraprofessionals employed in programs receiving federal Title I programs. A second category of paraprofessionals, those assisting in the delivery of special education and related services, were the subject of amendments to the IDEA.

The need to articulate qualifications for special education paraprofessionals was first mentioned in the 1997 reauthorization of IDEA, restated in the 2004 reauthorization, and has now been more substantively addressed in federal regulation. The IDEA now requires that paraprofessionals assisting "in the provision of special education and related services . . . to children with disabilities" be appropriately trained and supervised in accordance with state law, regulation or policy.[6]

The aspect of IDEA that most greatly expanded the use of paras is the requirement that students with disabilities be provided a free appropriate public education (FAPE) in the least restrictive environment (LRE). This legal concept of inclusion requires that local school districts educate students in general education settings with their non-disabled peers to the greatest extent possible. To do that, districts often employ paraprofessional supports to assist special education students in general education schools and classrooms.

Federal level administration. At the federal level, the U.S. Department of Education (USDOE or DOE) issues regulations and employs staff responsible for broad oversight of state compliance with both Title I of the ESEA, now NCLB, and the IDEA. This is largely accomplished through the monitoring of data, plans, and other documents submitted by each state's State Education Authority (SEA), which, in Connecticut, is the Connecticut State Department of Education (CSDE).

In connection with Title I, some of the required data and reporting allows federal monitoring of achievement of students, including those with diverse learning needs such as English language learners (ELL), students with disabilities, and students from low income families. Other required data and reports allow monitoring of the number and qualifications of certified teaching staff as well as non-certified staff. Broadly speaking, it is the Office of Elementary and Secondary Education that has oversight of the ESEA including the distribution of Title I funds to states for further distribution to individual districts.

In connection with the IDEA, required data and reports allow for the assessment of the frequency with which students are identified as requiring special education, with what service needs, and to what outcomes. State compliance with the dictates of the IDEA fall specifically within the provenance of the Office of Special Education Programs (OSEP) at the USDOE, and

[5] Paraprofessionals acting solely in the capacity as translator and/or conducting parent involvement activities are still only required to possess a high school diploma or equivalent.
[6] 30 C.F.R. § 300.156.

that office is also responsible for distributing federal special education funds to states to be distributed to local districts. In relation to paraprofessionals, federal law requires only that they meet qualifications, and are trained and supervised in accordance with, standards set forth in state law, regulation, or guidance. States report to OSEP on the number of special educational paraprofessionals overall working with students ages 3-5 and 6-21, and broken down by the number that meet and do not meet such state-determined qualifications.

Overall, federal law and regulation can be said to establish the framework within which states and local districts provide educational services and employ paraprofessionals. Individual state education authorities, such as the CSDE, must support and monitor compliance with this framework at the local level, not only by data collection and review, but also through the development of statewide policy and provision and maintenance of statewide resources.

State level administration. State Education Authorities (SEAs) are responsible for distributing most federal education funds to local school districts, which are designated Local Education Authorities (LEAs). This includes the distribution of both regular education funding (such as Title I funds) and special education funding. In addition the federal government has delegated to states the tasks of collecting district-level data, monitoring local district compliance with both the ESEA and the IDEA, and compiling and submitting statewide data to the USDOE.

CSDE has also promulgated regulations pertaining to special education which stipulate much of how districts must deliver special education services. Those regulations, updated in 2103, specifically address how aides (i.e., paraprofessionals) should be used, clarifying that they should work in frequent and close proximity to a certified staff person.

Several different offices, bureaus and divisions within CSDE play a role under the federal laws which are applicable to local district use of paraprofessionals. These include, but are not limited to, the Bureau of Accountability and Improvement, the Bureau of Special Education, the Due Process Unit, the Talent Office and the Turnaround Office. While CSDE's monitoring and oversight duties will be discussed at greater length in Chapter V, a number of them are summarized below.

One of the most visible ways in which the CSDE supports the development of the paraprofessional workforce in the public schools is through coordinating the statewide School Paraprofessional Advisory Council. This council was statutorily created in 2007, meets quarterly, and advises the Commissioner of Education annually on the training needs of instructional paraprofessionals and the effectiveness of existing training.

Another way CSDE assists both individual paraprofessionals and the districts that employ them is through establishing guidelines and practices for how paras can be most appropriately and effectively used. In 2012 the Connecticut State Department of Education (SDE) issued *Guidelines for Training & Support of Paraprofessionals Working with Students Birth to 21*, which provides detailed guidance on what training and support might appropriately be provided, but leaves the issue of determining specific qualifications and training needs, as well as how to evaluate and supervise paraprofessionals, largely in the hands of local school districts.

Local level administration. Just as the nation has seen a great expansion in the use of paraprofessionals, so has Connecticut. As illustrated in Figure I-1, between 2002 and 2012, the number of instructional paraprofessionals has increased about 13 percent. And while there are still paraprofessionals who assist a single classroom teacher, usually in Pre-K, kindergarten or the early elementary grades, the largest increase has been in the realm of special education, where the number of paras assigned grew by 30 percent. Special education paraprofessionals now account for 67 percent of all FTE paraprofessionals in Connecticut, and to some extent, illustrates how federal laws influence how local districts use and assign paraprofessionals.

Figure I-1. Changing Numbers of Paraprofessionals (Connecticut 2002-2012).

Type of Non-Cert. Staff	Number in 2002-03	Change 2002-03 to 2012-13	Number in 2012-13
Special Ed	7,319	30.6%	9,562
Pre-K	744	8.5%	807
Other Program	749	2.4%	766
ESL/Bilingual	247	2.0%	252
Kindergarten	758	-12.1%	666
Reading	587	-17.7%	483
Regular Ed	1,662	-19.3%	1,342
Library/Media	801	-28.6%	572
TOTAL NCIS	12,867	12.3%	14,450

Source: PRI Staff analysis of CSDE data

While constrained to operate within the frameworks established by federal and state law and regulation, local districts retain a great amount of latitude in determining how to deliver educational services to all students, including those with disabilities. This latitude extends to and is evidenced by the variety of ways in which paraprofessionals are utilized in districts around the state. The absolute constraints can be summarized as follows:

- districts must adhere to minimum wage and other wage, hour and employment benefit laws (e.g., family and medical leave, and workers compensation);
- districts must recognize rights to unionize and bargain collectively pursuant to the Municipal Employee Relations Act (MERA);
- paraprofessionals can support instruction in various ways, but:
    - cannot engage in direct instruction;
    - must be supervised (as defined by Connecticut regulation) by certified staff;
    - must be appropriately trained; and
- must have certain qualifications if employed in Title I funded district or program

Thus, within the contours of any applicable collective bargaining agreement for unionized employees, each district may: establish its own rates of pay and benefits, determine work assignments and schedules, develop job descriptions, and employ as few or as many paraprofessionals as desired. Further, local districts can establish or require any specific level of qualifications for non-Title I paraprofessionals or require additional qualifications for Title I

paraprofessionals. It is up to local districts whether to: require specific pre-service training or none at all; require or offer mandatory, voluntary or no professional development activities; utilize an annual or more or less frequent employee evaluation system; and to specify that paraprofessionals shall or are prohibited from any specific activities vis-à-vis the students and teachers they serve.

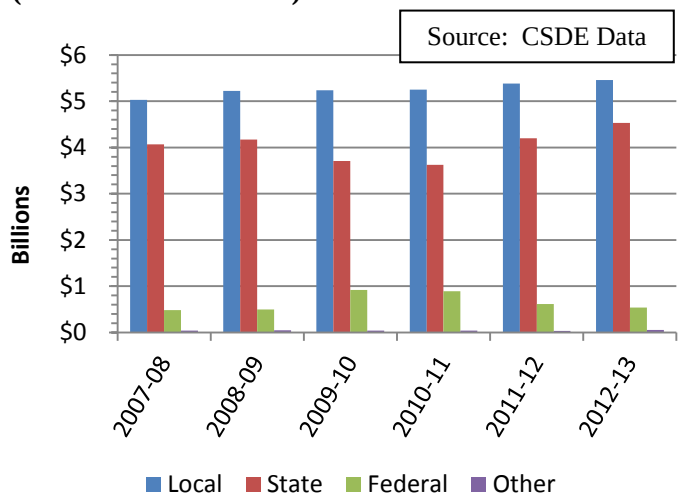
Chapter II

Connecticut's Paraprofessional Workforce: Economic Considerations

Connecticut, as with most other states, has been impacted greatly by the Great Recession and its aftermath. Unlike most other states, Connecticut did not experience cuts to education funding. According to a report issued earlier in 2014 by the Center for Budget Policy and Priorities, which used census data from 2008 to 2014, only 15 states, including Connecticut, did not incur reductions in state and local spending to education between 2008 and 2014. According to that report Connecticut's overall state and local spending per-student grew by 9.1 percent for the period.[7]

While this is not a study of education financing, it is impossible to look at school paraprofessional staffing and staffing levels, without considering what has been happening with funding for education. Figure II-1 shows the various revenue sources that make up overall education spending in Connecticut. Local revenue continues to be the largest source of funding, followed by state revenue. As shown in the graph, state funding dropped in 2009-10 and 2010-11, which was somewhat compensated by the federal share increases via the stimulus monies.

Figure II-1. Education Funding by Source (CT 2007-08 to 2012-13)

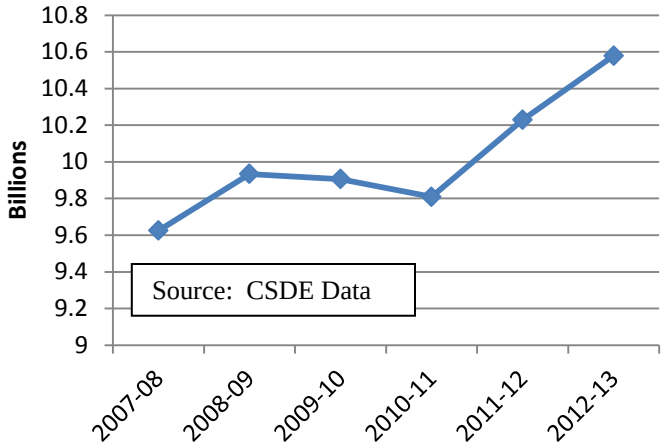


Indeed, as Figure II-1 shows, while education expenditures in Connecticut did dip slightly in 2009 through 2011, spending has now increased about $1 billion dollars from the 2007-08 level of $9.6 billion to almost $10.6 billion in 2012-13. Overall spending on education has increased 9.9 percent over the six-year period, but because of the two years that incurred declines in spending, the annual average increase has been about 1.9 percent, before adjusting for inflation.

Inflation, measured by the consumer price index (CPI), has been fairly flat over the past few years (about 1.2 percent annually). However, local school district administrators, superintendents, and others involved in local school budgets indicate that CPI does not accurately portray how costs have increased for school districts. They cite wage increases already negotiated into contracts for teachers and other school employees, double digit annual rises in health care premiums, and other insurance costs like workers' compensation, in addition to increases in utilities and facilities maintenance. Thus increases in funding do not necessarily translate into increased services, only to the rising costs of maintaining existing services.

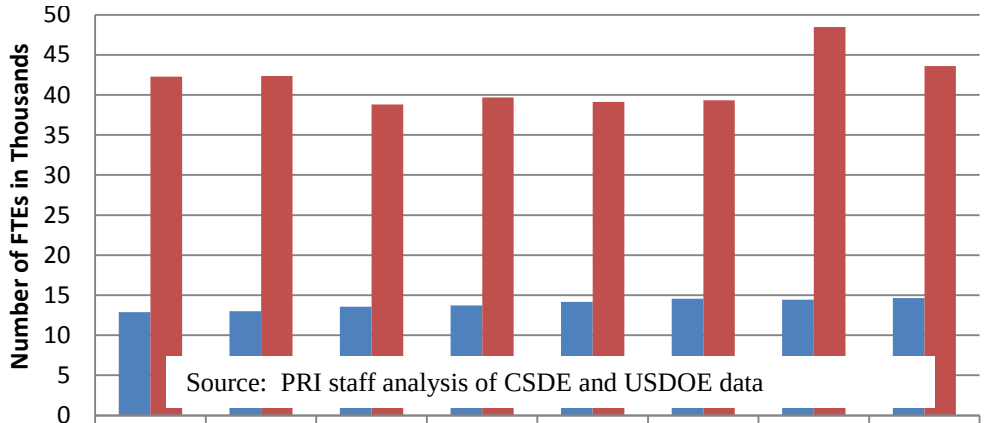
[7] Center on Budget and Policy Priorities (October 2014). *Most States Still Funding Schools Less Than Before the Recession.*

Figure II-2. Education Expenditures in Connecticut 2007-08 to 2012-13



To adjust for such rising costs, local school districts have been scrutinizing budgets for areas to cut. While there are some districts that have trimmed the number of paraprofessionals in the past few years, Figure II-3 below shows that statewide the number of paraprofessionals has remained fairly stable since the recession. In contrast, the number of certified teachers, which reached a peak of more than 48,000 in 2008-09, had declined by almost 5,000 certified teachers (10 percent) in 2009-2010.

Figure II-3. Full Time Equivalent Paraprofessionals (NCIS) and Certified Teachers (CT, 2002-03 to 2009-10)



	2002-03	2003-04	2004-05	2005-06	2006-07	2007-08	2008-09	2009-10
NCIS (CSDE)	12,867	12,994	13,576	13,706	14,143	14,548	14,441	14,631
Certified Teachers (NCES)	42,296	42,370	38,808	39,687	39,115	39,304	48,463	43,593

Non-Certified Instructional Staff

The term "paraprofessional" is surprisingly broad, in some instances being used to refer to all non-certified school district employees, from custodians and bus drivers to reading and literacy program assistants. Within the universe of non-certified staff, there is, however, a fairly clear breakdown between "instructional staff" and "non-instructional staff." Non-certified instructional staff (NCIS) is responsible for working with or supervising students, under the direction of certified staff. Non-instructional staff provides administrative support (e.g., school secretaries), custodial services, transportation, cafeteria service, *et cetera*, but do not have direct

responsibilities for students. CSDE uses these two broad categories to track all non-certified school district employees.

For purposes of CSDE data collection, NCIS positions are identified as "instructional assistants" and further divided into nine categories:

- Pre-Kindergarten;
- Kindergarten;
- Regular Program;
- ESL/Bilingual;
- Other Program;
- Special Education (students ages 3-5);
- Special Education (students ages 6-21);
- Reading Instructional Assistant; and
- Library/Media Support Staff.

Each year, Connecticut school districts report the number of full-time equivalent NCIS to the CSDE using Form ED162 (see Appendix A).

The 2006 PRI study team chose to use the term "instructional paraprofessional" to highlight the school district employees who were encompassed by that study. In deference to the categories used by the federal government and CSDE, this study will simply use the term "paraprofessional" (as is used in the IDEA and ESEA) interchangeably with "non-certified instructional staff" or "NCIS" (the term used for CSDE data collection).

Job Titles

The staff identified as fitting into each of the nine categories of NCIS may have different job titles in different school districts. One district may use the title "paraprofessional" for employees who have duties similar to another district's "instructional assistants." Moreover, within a single school district there may be multiple job titles that fit into each one of the nine categories. For example a district may have staff called "special education paraprofessionals" and others called "special education tutors" but report both to the CSDE as "special education instructional assistants."

Across the 27 districts responding to the survey PRI staff sent to superintendents' offices, 2,233 individuals were reported to be holding "paraprofessional positions." Based on the 14,450 non-certified instructional staff positions reported to CSDE for the 2012-13 school year (the last year for which CSDE data was available), the survey results can be estimated to reflect about 15 percent of all NCIS in Connecticut's public schools.

Table II-1. Number and Percent of Paras by Categorical Job Title		
Title	**Number**	**Percent**
Paraprofessional or Para	1524	69.7%
Aide or Assistant	501	22.9%
Tutor	36	1.6%
Technician/Specialist	21	1.0%
Other	105	4.8%
Source: PRI staff analysis of PRI survey data		

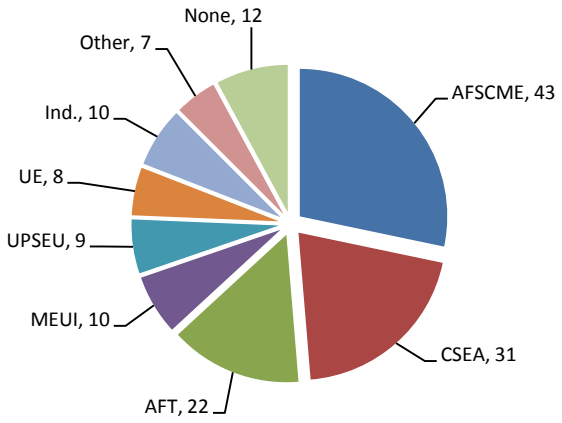
Across the 27 districts and 2,233 NCIS, 59 unique job titles for paraprofessionals were identified. Not all districts provided exact counts of the number of employees by job title, but Table II-1 illustrates how many of 2,187 individual NCIS were identified by the most common job titles. Almost 94 percent of all NCIS in the districts responding to the survey were identified as "paras," "aides," or "assistants." When any of these titles were part of a longer job title, there was often a modifier to indicate the grade level, type of classroom, or type of program in which individuals holding the position would work. Specific modifiers in titles included: Elementary Grade Level, Grades 1 & 2, Instructional, Library/Media, Mathematics, Remedial Math, Remedial Reading, Special Education, and Resource Room.

Another cluster included eight job titles that included the word tutor. These job titles often had modifier such as programs for speakers of other languages (ELL, ESOL[8]), or specific programs within Title I, or in specific area like Math & Language Arts. This group of titles included only 36 individuals across the 27 districts. Even fewer job titles and individuals fit into the technician/specialist title group, and all of these titles were used by only two districts. This group included the titles "Behavior Specialist," "Behavior Technician," and "Truancy Specialist" and contained 21 individuals. The remaining 105 job titles included positions that were possible misidentified as either "non-certified" (such as ABA Therapist and Occupational Therapist) or "instructional" (such as van driver). Although some of the other titles included some that may have been non-certified and instructional in nature (such as In School Suspension Monitor) other were ambiguous (such as Special Education Trainer). This group of other titles was omitted from the next analysis, regarding unionization, due to the lack of clarity about what each position involved.

Unionization

Figure II-4 illustrates the union representation status of paraprofessionals in Connecticut's 166 local and regional school districts. Unions represent paras in over 90 percent of the districts, with all but 12 of Connecticut's school districts having paras covered by a union. (For a full listing of unions by name, see Table II-2.) Three of the unions, AFSCME, CSEA, and AFT, represent paras in over 60 percent of districts.

Figure II-4. Union Representation By Number of CT Districts Represented



Source: PRI staff analysis of union contracts

[8] ELL is English Language Learners and ESOL is English to Speakers of Other Languages

Table II-2. Unions Representing Paraprofessionals in Connecticut by Acronym	
AFSCME	American Federation of State County and Municipal Employees
AFT	American Federation of Teachers
CSEA	Connecticut State Employees Association
MEUI	Municipal Employees Union Independent
UE	United Electrical, Radio & Machine Workers of America
UPSEU	United Public Service Employees Union

PRI staff reviewed all collective bargaining agreements (CBAs) currently in force and found that some are with a town or municipality and cover all types of municipal workers, while others are with a local school district but cover many different types of school employees like school bus drivers, custodians, and secretaries, as well as paraprofessionals. Still other CBAs are with a school district, but cover only school non-certified instructional staff like paras.

As municipal school district employees who are not certified, paraprofessionals in Connecticut's public schools fall under the provisions of the Municipal Employee Relations Act (MERA) rather than the Teacher Negotiations Act (TNA). The protections and opportunities available to remedy complaints about the terms and conditions of employment through MERA will be described later in this chapter.

While Figure II-4 shows the number of **districts** that are unionized, capturing the number of **individual paraprofessionals** that are unionized is more difficult. This is because not all NCIS job classes or job titles are necessarily covered under collective bargaining agreements. And, even if the job class is included, an individual may have to work a certain number of hours before the provisions apply. Although union locals may have counts of exact numbers of members, these counts are not maintained at central union offices. CSDE's data cannot be utilized for this purpose, as it collects data on FTEs, not individual staff members.

The PRI survey to district superintendents did yield some helpful information, albeit for only a small number of Connecticut districts. Of the 1,524 employees holding positions that include paraprofessional or para in the title, all but six (<0.5 percent) were members of a union. Those six individuals were all employed in a single district that is among those with no paraprofessional union.

When looking at employees whose titles included aide or assistant, union status was more mixed. Roughly half of these positions were unionized and half not unionized. Exactly one-half of the 36 employees identified as "tutor" were in unions and one-half were not (this includes one tutor in the district with no paraprofessional union). Through conversations with administrators, it appears that in most districts positions for tutors and technician/specialists are filled by individuals with at least a bachelor's degree, even though there is no legal or regulatory requirement for such qualification. Moreover, these positions reflect a very small portion of the total universe of NCIS.

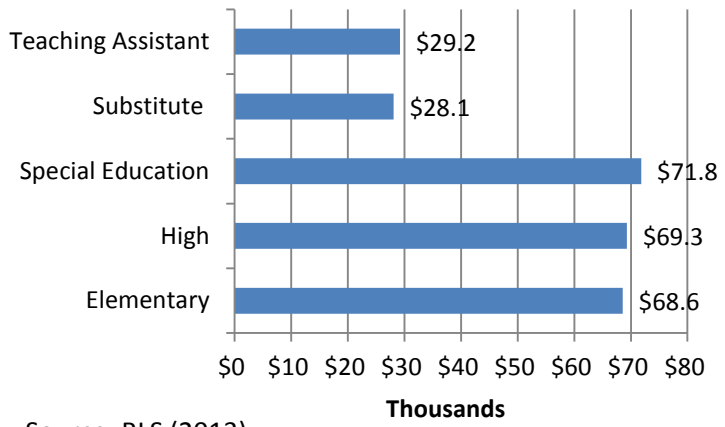
When districts have separate titles for paraprofessionals and aides/assistants, the aide/assistant positions often are specific to a certain kind of service (behavior, speech, occupational therapy) and are not unionized. Thus, it appears from the available data that the

titles aide and assistant are used differently in different districts. None of the positions falling into the technician/specialist title category were unionized. The results of the survey were similar to what the staff's review of collective bargaining agreements (CBAs) showed – that there was variation among the districts in what paraprofessional were called and which districts covered which job classes in the CBAs.

Wages and Hours

Hourly rate. On average, a paraprofessional earns substantially less than a certified teacher. Also, most teachers are paid a salary, which means their income does not generally fluctuate from pay period to pay period. As reflected in the way wage data is collected and reported for paraprofessionals, and the review of CBAs covering paras in Connecticut, most earn an hourly wage. So, not only are paraprofessionals paid less than teachers, but paras may experience fluctuations in their income as a result of school cancellations or other routine disruptions to their schedules.

Figure II-5. Average Annual Compensation of School Employees in CT -- 2013



Source: BLS (2013)

According to the Bureau of Labor Statistics (BLS), teacher aides (which is the term BLS uses) in Connecticut earn $29,230, which is about 42 percent of the salary of an elementary school teacher and 41 percent of the salary of a special education teacher.

The BLS estimate includes all public and private school teacher aides. In order to determine current wages within Connecticut's 166 local and regional school districts, PRI staff reviewed all available collective bargaining agreements covering paraprofessionals. As with much of the information pertaining to this study, there is substantial variation among districts and it is difficult to pinpoint an average or median point even among a single district reference group as there may be several classes or levels of paras, and then several steps within each class.

Of the 143 contracts reviewed, the average number of steps was seven, the median was six, but one district had 23 steps for a single employee classification. Given this kind of wide variation in compensation schedules, and with so much depending on the length of time a para has been on the job, it is difficult to describe what exactly paraprofessionals are being paid. Nevertheless, Table II-3 below shows the range for the lowest classification level of para for each district reference group (DRG).[9] The vast majority of CBAs contain compensation

[9] District reference groups (DRGs), which will be explained in greater detail in Chapter III and Appendix C, reflect CSDE's categorization of all school districts into nine groups, based on socio-economic characteristics like median household income and percent of all adults with a college education. The DRGs range from the very affluent, low-need suburban districts in DRG A to lower-income, higher-need districts in DRG I.

schedules expressed as hourly wages; for the few that contained annual or biweekly salaries, PRI staff converted to hourly, using a standard 1,080-hour school year.

Table II-3. Paraprofessional Compensation by District Reference Group Most Current Year of Contract (N=143)

DRG	Number of Districts	Median Low	Median High
A	9	$19.98	$24.26
B	21	$14.68	$19.30
C	27	$13.29	$17.31
D	20	$13.90	$18.69
E	21	$13.27	$17.19
F	16	$13.50	$17.37
G	13	$13.35	$16.41
H	9	$13.80	$18.69
I	7	$16.39	$20.39
Statewide	143	$13.75	$17.80

Source: PRI Staff Analysis of Paraprofessional Collective Bargaining Agreements

The highest median salary is paid in districts in DRG A, with the median low at almost $20 per hour and the median high at a little over $24 an hour. The next highest median salary is paid in DRG I, with the median low at about $16 an hour and $20 at the median high. As shown in Table II-4, DRGs B, C and I all include districts that have among the ten lowest and ten highest starting salaries for paraprofessionals.

Table II-4. Paraprofessional Beginning Salaries – Lowest 10 Districts and Highest 10 Districts Categories

	Minimum	DRGs Represented and #
Lowest 10	$9.25- $11.00	B(2), C(3), E(2), G(2), and I(1)
Highest 10	$20.04 - $28.13	A(4), B(2), C(1), D(1), F(1), I(1)

Source: PRI Staff Analysis of Paraprofessional Collective Bargaining Agreements

Full-time vs. part-time. Some contract or employment benefits, such as participation in employer-sponsored health insurance, are contingent upon status as a full-time rather than part-time employee. There is no easily accessible source of information about the number or percent of all paraprofessionals who work full-time or part-time. There is not even agreement on how many hours a week constitutes part-time rather than full-time employment for a paraprofessional. The information reported to CSDE on non-instructional staff is based on full-time equivalents (FTEs), so it is fair to say that there are probably many more paraprofessional employees than there are FTE positions.

As a rough measure of full-time vs. part-time status, the PRI survey to school superintendents' offices, asked for the number of NCIS in each district who worked 20 hours a week or more and the number working less than 20 hours a week. Districts provided responses applicable to 1,537 employees. Of these NCIS, 1,395 (90%) worked 20 hours a week or more and only 144 (10 percent) worked fewer than 20 hours a week. Again, because of the low response rate no strong conclusions can be drawn about whether the NCIS staff represented in

the survey results are indicative of all of the paraprofessionals working in Connecticut school districts. The 20 hours a week is an imperfect measure of whether a position is full time or part time, and even less helpful in understanding how many paraprofessionals would like to work more or fewer work hours each week, it does illustrate a tendency for paraprofessional positions to be considered full-time more often than to be considered part-time.

Other Compensation

Stipends. PRI staff review of CBAs found that many contracts often provide paraprofessionals with stipends – additional lump sum compensation for performing extra duties or having a qualification or training. Examples of the stipends and the number of districts that provide them are included in Table II-5.

Table II-5. Paraprofessional Stipends For Extra Duties

Number of Districts	Type of Stipend	Example of Duties	Examples of Compensation
24	Specialized Training	• Applied Behavioral Analysis • Sign Language	---
25	Personal Care/Hygiene	• Feeding • Toileting • Diapering	• $.55 an hr. • $1,000 a yr.
26	Substitute for Teacher	• Class Coverage for periods of time	• 1.5 times regular pay • $1.00/hr. extra • $60/day extra
8	Advance education or credits	---	---
2	Perfect Attendance	---	---

Source: PRI Staff Review of Paraprofessional CBAs

The issue of stipends is notable as it demonstrates some of the duties paras are being asked to perform. It should be emphasized that for those districts where stipends are not provided, or where paras are not unionized, it does not mean that paras are not performing similar duties, only that they are not receiving any extra level of compensation through their collective bargaining agreement.

Longevity pay. As with many relatively low-paying jobs, PRI staff was told repeatedly that some districts experience difficulty in retaining individual paraprofessionals. Thus, many collective bargaining agreements reflect annual longevity bonuses for paraprofessionals who have worked for certain periods of time. The number of years before the bonus is earned ranged from three years to 15 years. Figures II-6 and II-7 show the amounts given in 81 districts. The longevity bonuses can range from less than $100 to more than $600, for paraprofessionals when they first meet the longevity threshold, as shown in Figure II-6 on the left. At the top range, for paraprofessionals who have been in the district many years, the bonuses can remain as low as $150 or exceed $1,000, as shown in Figure II-7 on the right.

Figure II-6. Starting Longevity Bonus (n= 81 districts)

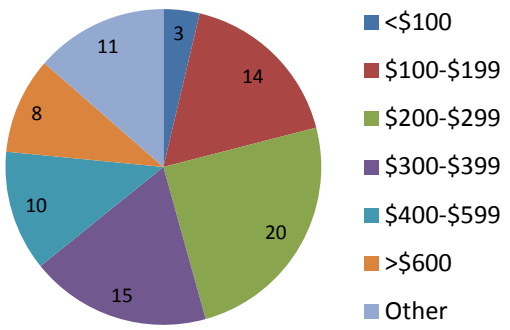
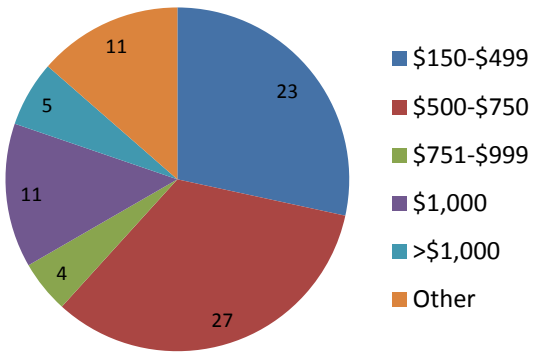


Figure II-7. Maximum Longevity Bonus (n= 81 districts)



Benefits

Paid time off. All of the contracts reviewed by PRI staff contained provisions for paid sick time and holidays during the school year. Often the CBAs included provisions for paid personal days, but they typically require prior approval and/or can only be used in certain defined circumstances.

Health insurance. The vast majority of districts offer their paraprofessionals health insurance. A review of the contracts indicates that, like many other kinds of employers looking to cut costs, districts are providing less generous benefits in recent years. Often, the health insurance offered to paraprofessionals is for a high deductible (typically $500-$2,000 per person up to $1,000-$4,000 per family) before benefits start. The district sometimes contributes half of the deductible into a health savings account. The contracts do not often indicate the actual premiums for insurance, but often the employee is responsible for at least 10 percent and sometimes more than 20 percent of the premiums.

Paraprofessionals are typically offered the same health insurance plans available to all employees in the district or town. However, as para union representatives note, in light of the fact that the average paraprofessional's salary is less than half the average teacher's salary,

paraprofessionals are much less able to afford the premiums and deductibles than are certified employees.

Retirement. Another benefit that may be offered by districts is retirement. But, as with most contract provisions, retirement or pension benefits are extremely varied. A few CBAs, especially those that include other municipal workers, still offer a defined benefit plan, with paras paid a pension based on number of years worked, and highest years of salary earned. More common, however, is a defined contribution retirement plan with the employee contributing a certain percentage of his or her salary and the district or town contributing a percentage.

Hiring, Turnover, and Retention

Vacant positions. Although there are anecdotal reports that some districts have difficulty filling paraprofessional positions or experience high rates of paraprofessional turnover, this is another area in which there is limited research and data. In May of each year, CSDE conducts a survey of school districts to assess hiring, and more specifically where there are shortages and available positions that had not been filled by October 1st of that school year. This survey includes a category on the number of NCIS positions open and not filled; Table II-6 depicts these numbers on a statewide basis for the prior two school years.

Table II-6. Annual Paraprofessional Vacancies and Number/Percent Remaining Unfilled by October 1st (CT Statewide, 2012-13 and 2013-14 school years)

	2012-13			2013-14			
Position type	Available positions	Not filled Oct. 1st	Percent Vacant Oct. 1st	Available positions	Not filled Oct. 1st	Percent Vacant Oct. 1st	**Change in Vacancy Rate**
Pre-K	15	3	20%	7	1	14%	↓
Kindergarten	2	0	0	10	3	30%	↑
Regular Program	26	3	12%	29	7	24%	↑
Special Education	146	15	10%	190	20	11%	↑
ELL/ESL	1	0	0	2	0	0	--
Other Program	23	5	22%	16	0	0	↓
Total	213	26	12%	254	31	12%	--

Source: CSDE Data Bulletin Public School Hiring Trends May 2013 and 2014

Although the percent vacant columns in Table II-6 is of available positions, this CSDE data does indicate that there are districts that are finding it difficult to fill open positions, with the greatest number of open positions being for special education paraprofessionals, largely because this is the category with the most open positions. It may be noteworthy that while the percentage has remained the same, there are more positions open in the past school year than in the year before and a greater number still vacant by the October 1 reporting date.

The PRI survey to district superintendents' offices attempted to obtain a snapshot of the current vacancy rate for paraprofessional positions by asking how many NCIS were currently employed and how many vacant positions the district was currently seeking to fill. The survey results showed an estimated 2 percent vacancy rate.

The information on vacancy rates contained in the table and from estimates on results from the PRI survey, and both based on self-reported numbers from the districts. PRI staff reviewed the websites for all districts during late November and early December 2014. Sixty-one districts had open positions for full-time or part-time paraprofessionals or similar non-certified instructional support staff posted on the website. While it is not always clear from the websites how long the positions were open, or when they were initially posted, it does seem that many districts have many open positions well into the school year.

Paraprofessional turnover. Although the number of open positions is an important factor in districts' overall ability to serve its students effectively, the frequency with which staff needs to be hired and replaced should also be considered. As reflected by the existence of longevity bonuses in many collective bargaining agreements, there are costs associated with not only hiring and training new staff, but also inefficiencies that may result when there is staff turnover and a need for new staff to become familiar with routines, students and their co-workers. The survey to district superintendents' offices attempted to capture information about the frequency with which districts incurred costs and experienced inefficiencies associated with staff turnover by asking what percentage of all paras had been new hires in each of the prior few school years.

For the 20 districts completing the survey items relating to paraprofessional turnover, almost half (nine districts) indicated that they had hired less than 10 percent of all their paras in each of these four years. No district reported 20 percent or more of their paras being new hires more than twice in this four-year period. Two of the districts that reported such a large percentage of new hires were districts in which there were fewer than 10 paraprofessionals employed and had other years with no turnover at all. Only three of the 20 districts were consistently at or above 10 percent of its paraprofessionals being new hires for each of the four years, and two of these districts employed well over 100 paraprofessionals.

In 2006, the PRI Study on School Paraprofessionals reported on the turnover rates for paraprofessionals in the years 2000-01 through 2004-05 by asking districts what percentage of their paraprofessionals had not returned in the fall after having been employed at the end of the prior school year. Turnover rates remained relatively constant during this period. In 2004-05, almost half of all districts reported that they fewer than 6 percent of their paraprofessionals had not returned in the fall, and only about 22 percent indicated that they needed to replace over 10 percent of their paraprofessionals. Although this data is about 10 years old, when viewed with the results of this year's survey to district superintendents' offices it suggests that the rate of paraprofessional turnover has remained relatively constant since 2000 and that this rate is probably not reason for statewide concern.

Retention. Data on how long paras stay in the field is also difficult to obtain. What research does exist suggests that there are two groups of paraprofessionals: "stayers" and "leavers." Stayers are paraprofessionals who, for any number of reasons, stay in paraprofessional positions for many years. The stayers group of paraprofessionals is reflected in UConn UCEDD's survey responses indicating that of 2,320 responding, over two-thirds (70 percent) had worked as paraprofessionals for seven or more years, with well over half (54 percent) of all survey respondents having worked as paraprofessionals for 10 years or more. UConn UCEDD's findings from its 2013 survey were consistent with a 2001 survey in another New England state

in which 60 percent of survey respondents had been employed as paraprofessionals for six years or more.[10] This high retention rate was also confirmed by AFT, albeit over a shorter period of time. In response to PRI staff's inquiry, the union informally polled its local representatives, and found a 95 percent retention rate over the past year.

The second group of paraprofessionals – the leavers – includes those who, also for a variety of reasons, work for a few years or less as paraprofessionals and then simply leave the field. This group was clearly illustrated when a survey was distributed to over 4,000 known Vermont paraprofessionals in the late 1990s. When fewer than 15 percent of the surveys were returned, the researchers followed up with recipients to determine why this would be the case. They found that fewer than half of the survey recipients were still employed as paraprofessionals.[11]

There is no Connecticut data that was obtained more recently than the UConn UCEDD survey, nor any Connecticut data that encompasses a larger percentage of all NCIS. As with the data regarding the relatively low vacancy and turnover rates, the data should not be used to make global statements of statewide applicability. Instead they are offered to illustrate that like most other aspects of paraprofessional utilization, challenges in hiring and retaining effective NCIS should be assessed at a district or school level.

State Oversight of Unionized Paraprofessionals

How paraprofessionals are used in local school districts is to a great extent, determined by the districts themselves. If a district is unionized, the paraprofessionals covered under that CBA are afforded certain protections through the Municipal Employees Relations Act (MERA). The Connecticut Department of Labor (DOL) is the state agency charged with administering MERA, which it does through its Board of Mediation and Arbitration (SBMA) and Board of Labor Relations (SBLR).

As noted earlier in the chapter, the vast majority of districts are unionized, but exactly how many individual paraprofessionals are unionized is a harder number to determine, as contract vary in the number of hours a paraprofessional must work in order to covered by the CBA, and the job titles that are covered in the contract and subject to its provisions, may also vary.

State Board of Mediation and Arbitration. The SBMA offers its mediation and arbitration services to private and public sector entities when employees are unionized. The SBMA assists in one of two situations. One is to mediate and arbitrate when parties have reached an impasse in negotiations for a CBA. The other is to resolve employee grievances when there is a dispute over the application or interpretation of the terms of an existing CBA.

SBMA jurisdiction over employee grievances is reactive, in that it is exercised only in regard to grievances or situations that rise to the state level. All of the CBAs reviewed by PRI staff contained a grievance process. While the number of steps varied, all required that parties to

[10] Riggs, C.G. and Mueller, P.H. (2001). Employment and Utilization of Paraprofessionals in Inclusive Settings. *The Journal of Special Education*, 35:1, pp. 54-62.
[11] Id.

a CBA attempt to settle the grievance on their own before seeking assistance from the SBMA, or from the American Arbitration Association, or American Dispute Resolution Center, which some parties to CBAs choose to use as alternatives to SBMA.

State Board of Labor Relations. The SBLR is involved in the certification of employee bargaining units and in the resolutions of complaints about unfair labor practices. This can involve claims that an employer has: failed to bargain on issues of wages, hours, or working conditions; made management decisions that impact members of the bargaining unit without bargaining about such impact; or retaliated against an employee who exercised grievance rights. Another category of complaints heard by the SBLR are those involving employees' claims that their unions breached the duty to represent them fairly in relation to a grievance or complaint. Issues that come before the SBLR are generally an application of MERA provisions to specific factual situations, rather than the interpretation of specific contract language in a CBA.

Number of grievances or complaints. Final decisions of the SBLR are accessible to the public online, but many of the cases that are submitted to the SBLR are resolved before a final decision is rendered and no information is readily available about such cases. Final awards made by the SBMA are not available online, although they are public records. PRI staff could find no recent cases, either prohibited practice charges or grievances, involving paraprofessionals, where a final decision was rendered by either board.

PRI staff met with staff of both the SBMA and SBLR to discuss their role in overseeing MERA. Prior to the meeting, staff summarily reviewed its board's cases. SBMA staff indicated that a number of contracts involving paraprofessionals do go to binding arbitration each year, because of the parties reaching an impasse in negotiations, but that they were not able to locate any recent grievance awards involving paraprofessionals. SBLR staff indicated its review produced 10 complaints that involved paraprofessionals that had reached the board. Activity of both boards that involve paras is contained in Appendix B. While it cannot be concluded with any certainty, given the lack of automated systems that can readily produce statistics on complaints by topic or party, it appears that there were only 10 cases involving paraprofessionals that reached SBLR since the beginning of 2014.

In its survey to districts on the overall use of paras, PRI staff asked about the number of grievances filed at the local level. Among the 27 districts that responded only three grievances involving paras had been filed during the 2013-14 school year. PRI staff also asked two of the largest unions representing school paraprofessionals if they had information regarding numbers of grievances filed at the local level. Neither union was able to produce any usable data. In interviews with union representatives, they cautioned that numbers of grievances may be deceptive since paraprofessionals may fear employer retribution if one is filed.

Many contracts stipulate that employers cannot retaliate because a union member files a grievance. Further, the MERA provides statutory protection of all unionized municipal employees, including paraprofessionals, from retaliation for engaging in protected activity. Protected activity for purposes of MERA includes raising and pursuing grievances through procedures contained in a collective bargaining agreement or employee handbook. If a paraprofessional pursued a grievance, and then believed she was being retaliated against for

having done so (by termination, re-assignment to more onerous duties, etc.), he or she would have a right to pursue a prohibited practice complaint alleging retaliation with the SBLR.

PRI staff were told that unions, like most other organizations in the current economic climate, were operating in an atmosphere of limited resources and did need to make decisions about where to direct those resources. However, no one PRI staff interviewed indicated that union representatives were discouraging paraprofessionals from filing grievances for economic or other reasons. Likewise, there was no indication that in the few situations where paraprofessionals had pursued grievances there had in fact been retaliation. There was also no suggestion that unions would be reluctant to file prohibited practice complaints when warranted. If a union did in fact refuse to file a grievance on behalf of an employee, and/or refused to pursue a prohibited practice complaint, the employee could not only pursue the grievance independently but could also file a prohibited practice complaint again the union asserting breach of the union's duty to provide fair representation.

PRI concludes that the grievance and complaint processes outlined in collective bargaining agreements and MERA are the legal routes available to paraprofessionals for many of the complaints voiced during the study involving working conditions and assignments.

SBMA and SBLR records. DOL staff described how records of grievance and prohibited practice proceedings were maintained. In the case of SBMA, the existing system does not make any information available about the content of ongoing or resolved cases unless and until there is a final award. Such final awards are public documents, but are not made available on the SBMA website. Individuals or entities with an interest in keeping abreast of current issues that have been the subject of awards between parties to CBAs can pay a modest fee of $100 a year to receive all final awards. This includes both binding interest awards arising from situations where parties cannot reach final agreement on the terms of a collective bargaining agreement and awards arising from hearings on employee grievances. For individuals and entities interested in obtaining copies of awards relating to specific parties, kinds of employees, or specific issues, a request would need to be made and receipt of any particular award would be dependent upon the collective memory or search procedures employed by the staff of the SBMA.

PRI finds it would be helpful to individual municipal employees, their bargaining units, and union representatives if the SBMA made final awards available through its website and created an index system through which grievances were generally collected into topical categories and all grievances within a particular topic area could be identified through a keyword search.

In the case of the SBLR, final decisions of the board, including those issued in response to prohibited practice charges, are made available through the SBLR's website and keyword-searching is available. In addition, the SBLR website includes links to summaries of decisions pertaining to various issues raised under MERA. This includes summaries of decisions involving complaints of employer retaliation for employee grievance activities and complaints of union failure to fairly represent bargaining unit members. Unfortunately, these summaries of final decisions only include cases decided through the year 2005. Also, as noted above, not all cases that involve complaints filed with the SBLR reach the stage of a final decision, as many are settled before that.

PRI believes it would be helpful if all prohibited practice and other complaints filed with SBLR were entered into a searchable database that included such information as complainant type, date of filing, category of employee, and date and type of settlement or final decision. This would be similar to the summary information provided in Appendix B.

The committee recognizes that all state agencies are under fiscal constraints, nevertheless, the DOL's exercise of legal authority in resolving disputes has implications for employees, workplaces, and working conditions throughout the state. It is important that as much of the available information about this process as can be legally made public is available and accessible. **Therefore, the program review committee recommends DOL make all final decisions and awards of the SBMA and SBLR available online. Further, because many of matters before both boards are resolved before final decision or award, searchable summary information on all grievances and complaints should also be available on DOL's website.**

Chapter III

District Utilization of Paraprofessionals

In order to understand how paraprofessionals are utilized in Connecticut's school districts, PRI staff interviewed administrators, teachers, paraprofessionals, and parent advocates. In addition, PRI staff reviewed existing data sources and collected district responses to two surveys about paraprofessional staffing assignments within both general and special education.

Given that districts have enormous latitude in determining how to staff their schools, and vary tremendously in the profile of students who might receive paraprofessional support and the available labor pool, there is tremendous variation not only in what paraprofessionals do, but also how many there are. When trying to understand how districts use paraprofessionals and how many they choose to employ, factors that should be kept in mind include:

- the socio-economic and demographic characteristics of students;
- the number of paraprofessionals;
- balance of general and special education paraprofessionals;
- the number of students attending schools in the district, both with and without disabilities;
- the special education student identification rate; and
- the number of teachers both overall and in special education.

In addition, there are many other variables that are known to impact both paraprofessional staffing levels and what specific tasks and functions paraprofessionals perform in individual districts and schools. This may include:

- number of available classrooms or other instructional spaces;
- number of students at various grade levels in various schools;
- the size of the available labor pool; and
- the likely educational attainment/training of individuals in the labor pool.

PRI could find no way of quantifying these kinds of factors, but remained mindful that these factors, and others, may explain many of the observable differences in paraprofessional staffing patterns.

Ultimately, PRI found that there is great variation in how many paraprofessionals there are, what paraprofessionals do, and even in what paraprofessionals are called across districts. The PRI committee's findings are, broadly speaking, listed here:

- There are many different job titles, duties, and responsibilities associated with the catch-all category of "instructional paraprofessional."

- Duties and responsibilities of paraprofessionals vary greatly from district to district, and even among paraprofessionals in a single district.

- Although paraprofessionals can be found working at every grade level, the majority work in the elementary grades.

- Most paraprofessionals are working with groups of students, not individual students.

- Most students with disabilities do not receive 1:1 paraprofessional support.

- About half of all students who do receive 1:1 paraprofessional support are in the autism and intellectual disability service categories.

- The ratio of students to both certified and non-certified instructional staff varies considerably from district to district, even within DRGs.

- As a general rule, districts in DRG I have more special education students per special education paraprofessional than do districts in the other eight DRGs.

A Note on DRGs

In order to organize and describe variation in school paraprofessionals staffing, District Reference Groups (DRGs) are used as a sub-unit of analysis. The DRG classification system is described in Appendix C but, generally speaking, districts assigned to DRG A are those in Connecticut's most affluent and well-resourced communities and the districts in DRG I are Connecticut's poorest large cities. Although reproduced in larger size in Appendix C, Figure III-1 is a map available through CABE in which towns are color-coded by DRG assignment and Table III-1 lists Connecticut's DRGs and their component districts.

Figure III-1. Connecticut DRG Map (Source: Conn. Assoc. of Boards of Education)

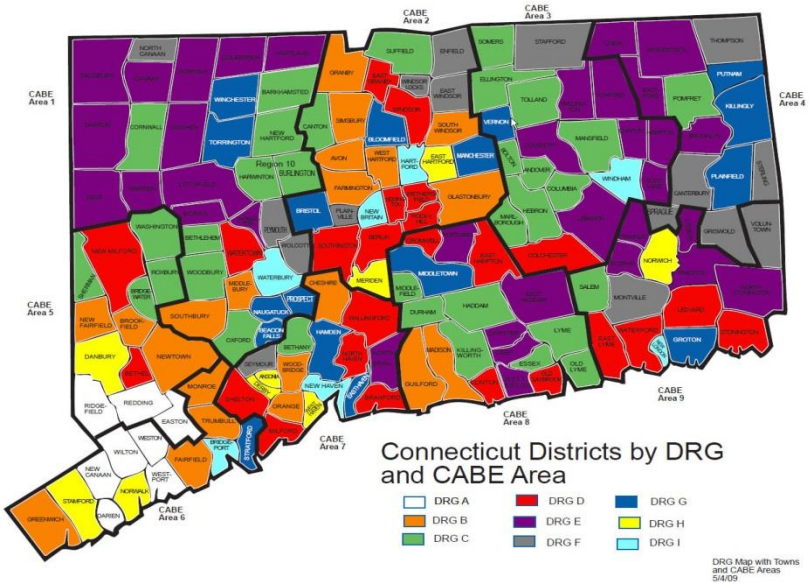


Table III-1. Connecticut District Reference Groups, 2006			
DRG A	Darien Easton New Canaan	Redding Ridgefield Weston	Westport Wilton Region 9
DRG B	Avon Brookfield Cheshire Fairfield Farmington Glastonbury Granby	Greenwich Guilford Madison Monroe New Fairfield Newtown Orange	Simsbury South Windsor Trumbull West Hartford Woodbridge Region 5 Region 15
DRG C	Andover Barkhamsted Bethany Bolton Canton Columbia Cornwall Ellington Essex Hebron	Mansfield Marlborough New Hartford Oxford Pomfret Salem Sherman Somers Suffield Tolland	Region 4 Region 7 Region 8 Region 10 Region 12 Region 13 Region 14 Region 17 Region 18 Region 19
DRG D	Berlin Bethel Branford Clinton Colchester Cromwell East Granby East Hampton	East Lyme Ledyard Milford Newington New Milford North Haven Old Saybrook Rocky Hill	Shelton Southington Stonington Wallingford Waterford Watertown Wethersfield Windsor
DRG E	Ashford Bozrah Brooklyn Canaan Chaplin Chester Colebrook Coventry Deep River Eastford East Haddam Franklin	Hampton Hartland Kent Lebanon Lisbon Litchfield Norfolk North Branford North Stonington Portland Preston Salisbury	Scotland Sharon Thomaston Union Westbrook Willington Woodstock Region 1 Region 6 Region 16 Woodstock Academy
DRG F	Canterbury East Windsor Enfield Griswold Montville North Canaan	Plainville Plymouth Seymour Sprague Stafford Sterling	Thompson Voluntown Windsor Locks Wolcott Region 11
DRG G	Bloomfield Bristol East Haven Groton Hamden Killingly	Manchester Middletown Naugatuck Plainfield Putnam Stratford	Torrington Vernon Winchester Gilbert School Norwich Free Academy
DRG H	Ansonia Danbury Norwalk	East Meriden Hartford Derby	Norwich Stamford West Haven
DRG I	Bridgeport Hartford New Britain	New Haven New London	Waterbury Windham

Paraprofessionals' Job Descriptions

Chapter II describes how non-certified instructional staff may have any number of job titles, even within a single school or district. It is not surprising that PRI also learned that paraprofessional job postings and job descriptions can vary significantly in their depth and breadth. By way of illustration, the CSDE's Sample Job Description from the Guidelines for Training & Support of Paraprofessionals is reproduced in Appendix D. This sample job description is quite long and detailed, but from the interviews PRI staff conducted it emerges that specific duties typically fall into the following areas:

- Assisting students with self-care (toileting, feeding, lifting/repositioning);
- Behavior management (routine or for special behavioral concerns or needs);
- Supervision of students (may be individual student or groups of students); and
- Assisting in individual or group learning activities.

Any individual paraprofessional may perform many, some, or only one or two of the duties,[12] and even within the same school each paraprofessionals may perform different duties from the global list contained in the CSDE sample job description. Duties and functions are most likely to vary based on assignment – whether the para is assigned to a single student with profound disabilities, to a classroom of early elementary age students, or to a middle school or high school classroom in which the majority of students have special education needs.

The number and variety of functions that paraprofessionals may appropriately be asked to perform is illustrative not only of the importance of such multi-purpose assistants in the school system, but also of the challenge in trying to describe exactly what a paraprofessional is. Ultimately, paraprofessionals, as a group, are many different things, operate in many different contexts, and possess many different sets of skills and aptitudes. A paraprofessional who works wonderfully with a severely disabled child who has limited oral language skills and needs assistance with feeding and toileting may not do so well if asked to assist in a fourth grade classroom where there is an expectation that the paraprofessional will work with small groups of children to advance their skills in multiplication.

A single broad job description like that provided by CSDE affords flexibility but may preempt the process of carefully articulating in advance what is expected in any single assignment. On the other hand, a narrow job description may deprive students and certified staff of paraprofessional assistance that may not be specifically described, even though the individual para involved could provide such assistance competently and without any additional training.

[12] It should be understood that the list of paraprofessional duties culled from the SDE Guideline Sample Job Description is just one of any number of lists that have been used through the years in trying to categorize the many possible functions of paraprofessionals. Using a different list of possible duties, the 2006 PRI paraprofessional study asked districts to identify the three most commonly performed functions for its paraprofessionals, the functions most frequently identified were: (1) giving individualized attention to one or a small number of students within classroom while teacher works with other students (108 of 115 districts); (2) facilitate a student's inclusion in general education classroom (70 of 115 districts); (3) assist with Individualized Education Programs (53 of 115 districts).

The correct balance between breadth and specificity in any single paraprofessional job description must be determined for each district or school based on the composition of the student population, available certified and non-certified staff resources, and many other factors.

Paraprofessional Assignments

In addition to differences in the specific duties to be performed, paraprofessionals can work at different grade levels, in different learning environments, and with different kinds of students.

Grade levels. Currently, the CSDE does not specifically collect data about the grade levels at which paraprofessionals are employed or the settings in which they work.[13] In order to cultivate some understanding of the grade levels of the students with whom paraprofessionals work, PRI staff relied upon two sources of information: 1) reported results from the a survey of paraprofessionals conducted by researchers at UConn's University Center for Excellence in Developmental Disabilities (UCEDD) in late 2013; and 2) district responses to PRI surveys sent to superintendents' offices and special education directors.

Table III-2. Percent of Paras Working at Various Grade Levels

Grade Levels	Percent of Paras
Pre-K and K	30%
1st through 4th	46%
5th and 6th	31%
7th and 8th	20%
9th through 12th	20%

Source: UConn UCEDD survey data, 2013.

Table III-2 reflects the findings of the UCEDD survey in regard to the grade levels of the students with whom paraprofessionals worked. Because individuals completing the UCEDD survey could choose one or more of these grade levels, the reported percentages total more than 100 percent and cannot be used to identify how many paraprofessionals work exclusively at any specific grade levels.

It is worth noting that, even if individual paras worked at other grade levels as well, only 20% of all paraprofessionals completing that survey worked with students at the high school level. In contrast 46% of paraprofessionals reported working with students at the 1st through 4th grade levels.

In the PRI survey to school superintendents, the choices of grade levels were limited to K-4th grade, 5th through 8th grade, and 9th through 12th grade and respondents were requested to choose only one category. The grade level assignments of 1,107 paraprofessionals could be determined and are depicted in Table III-3. Consistent with the UCEDD survey

Table III-3. Number of Paras Working at Various Grade Levels

Grade Levels	Number of Paras	Percent of Paras
K - 4th	764	68%
K - 8th	123	11%
5th -8th	86	8%
9th -12th	154	14%

Source: PRI survey data

[13] Data is available for the number of paras employed at specific schools, but because Connecticut schools have so many different grade level configurations (e.g., K-4, K-8, 7-12) it would be very challenging to use the school assignment data to make generalizations about the grade levels to which paraprofessionals are assigned.

findings, these data illustrate that most paraprofessionals are working with students at the elementary school level.

Classroom environments. The UCEDD survey also invited paraprofessionals to identify one or more settings in which they provided support to students. Seventy-nine percent of paraprofessionals indicated they provided support in the general education environment, 40 percent in special education classrooms, 35 percent in resource room settings, and 27 percent in other settings.

Because there were 4,045 responses from only 2,320 possible respondents, it is clear that many special education paraprofessionals are working in multiple settings. These findings suggests that many paraprofessionals move throughout the school building in order to perform their job duties rather than working in a single location, which in turn suggests that their job duties may vary even in the course of a single day depending on the immediate context in which they are providing support.

Number of students supported. The UCEDD survey included questions about how many students paraprofessionals typically worked with both at any one time and in the course of a day. Responses are reflected in Table III-4. These data suggest that the majority of paraprofessionals are not assigned 1:1 or to whole classrooms, but to different groupings of students believed to require instructional support at different times throughout the day.

Table III-4. UCEDD Survey Response Summary: Students worked with at one time and in the course of a day.

	Paras Responding they worked with this number AT ONE TIME (n=2,233)	Paras responding that they worked with this number IN COURSE OF ONE DAY (n=2,214)
1 student	18%	10%
2-4 students	40%	20%
5-10 students	25%	25%
More than 10 students	17%	44%

1:1 assignments. The PRI survey to district special education directors did not attempt to capture information about the numbers of students with whom each paraprofessional worked over the course of the day, but instead asked about the assignment of 1:1 paraprofessionals for students with disabilities. This choice was made because of union concerns that that paras who should be working 1:1 were being asked to cover more than one student at a time, or even to cover classrooms. This focus was also responsive to concerns raised in the research literature and by special education teachers and administrators interviewed by PRI staff that students were being assigned 1:1 paraprofessional support that was not really necessary.

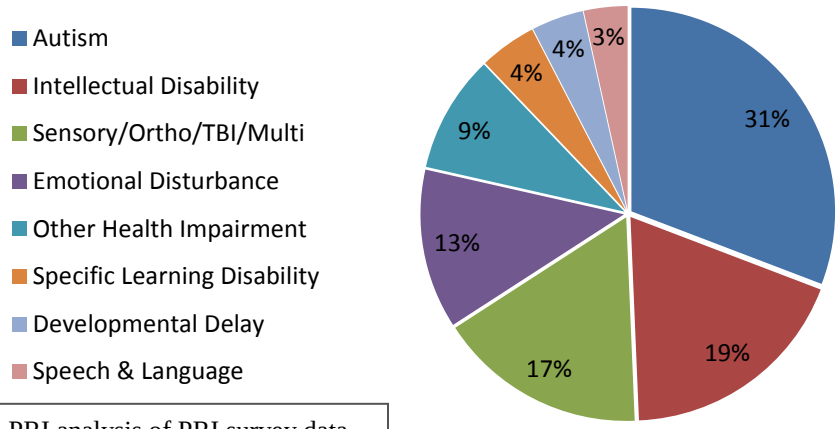
PRI staff learned through interviews that many districts consider it best practice NOT to assign a single paraprofessional to provide 1:1 support to a single student at all times during the day. Thus, rather than asking how many paraprofessionals provided 1:1 support, which could over-count the number of paraprofessionals working in a 1:1 context without regard for whether they also worked with groups of students in other contexts, the PRI survey asked how many

students required 1:1 support for all or part of each school day. The data should not be interpreted to suggest that the number of students requiring 1:1 support is equal to the number of FTE 1:1 paras that a district might need. Instead, this is just intended to be another broad indicator of how districts are utilizing paraprofessionals.

Twenty-five districts responded to this section of the PRI staff survey. PRI staff used the number of students in each district who were receiving special education services and enrolled in district schools as a denominator to calculate the percent of special education students who were receiving 1:1 support for all or part of the school day. These percentages ranged from 2 percent to 33 percent.

The largest number of students assigned 1:1 paraprofessional support in the districts responding to the PRI survey were students who received services in the categories of autism and intellectual disability. Figure III-2 shows the breakdown of students with 1:1 support by disability category. While not directly comparable, these findings resonate with those from a nationally representative study conducted to assess IDEA in the early 2000s. In that study, researchers found that 41 percent of all students with disabilities received some sort of assistance from a teacher's aide, including 60 percent of all students with cognitive disabilities and 72 percent of all students with "severe" disabilities (about 40 percent of the students in this group were diagnosed with autism).

Figure III-2. Percentages of all students with 1:1 paraprofessional support by service category (CT)



Source: PRI analysis of PRI survey data.

In general, it does not appear that large numbers of paraprofessionals are used exclusively to provide 1:1 support to students with disabilities, nor that large numbers of students are assigned 1:1 support. Nevertheless, based on concerns reflected in research and articulated by Connecticut special education teachers and administrators, districts in which a high percentage of students receive 1:1 paraprofessional support might want to evaluate special education service delivery in their schools and look for possible ways to decrease use of paraprofessionals in this way. Many tools for doing so are available, including a section in CSDE's Guidelines for Training & Support of Paraprofessionals.

Variations in Paraprofessional and Special Education Staffing Levels

Some of the metrics that PRI staff was able to compute to help illustrate differences in the numbers of paraprofessionals employed in districts include: the ratio of all students to special education teachers; the ratio of identified special education students to special education teachers; the ratio of identified special education students to special education NCIS; the ratio of all students to all NCIS; the percentage of all NCIS who are assigned to special education; and the ratio of special education NCIS to special education teachers.[14]

The most striking observation about these metrics is that the most extreme variation in both upper and lower directions usually occurs in DRGs E and F, which include 31 percent of all Connecticut districts (52 out of 166) but only about 10 percent of all Connecticut students. Thus, these school districts tend to be small to medium sized (average district wide Pre-K -12th enrollment in DRG E is 766 and in DRG F is 1,848), with median family income less than half that found in districts in DRG A but about twice the median family incomes found in DRG I. These districts are clustered in the northwest corner and the eastern side of the state and outside some of Connecticut's smaller cities.

The fact that DRGs E and F show the most variation in staffing metrics is illustrative of the fact that even when grouping districts in ways that make sense in light of quantifiable data, there are many non-quantifiable factors that are also at play and that may outweigh the influence of any quantifiable measures. Considering simply the geographic locations of the districts in DRGs E and F, and the demographic make-ups of the populations served by those districts, it is fairly easy to see how the community and district resources may vary dramatically. These districts may face very different challenges regarding: available job candidates, size and needs of the enrolled student body, and school system infrastructure (e.g., number and types of buildings and classrooms). Without information specific to an individual district, it is impossible to identify whether extreme departures from the average on any particular metric should be cause for concern.

Special educator density. This metric, measures the number of all students in a school and the number of certified special education teachers. The use of this metric reflects that a special educator's job duties typically go beyond serving only those children with IEPs. Special education teachers must guide and advise general education teachers who may have students with IEPs in their classrooms or other students who are struggling to learn but may not be currently identified as being entitled to special education services. Special education teachers must also have capacity to participate in the fulfillment of a school's legal obligations to identify and evaluate any student who may have a disability impacting his or her ability to obtain benefit from the general education process.

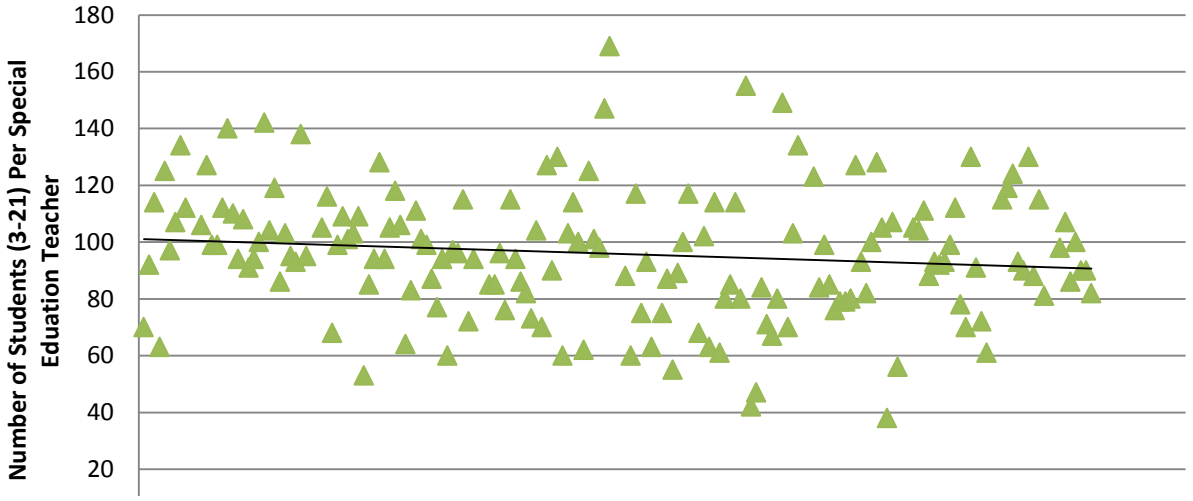
A nationally recognized expert in the field of paraprofessional use, Dr. Michael Giangreco at the University of Vermont's Center on Disability and Community Inclusion has repeatedly tested the hypothesis that schools with a special educator density below one special

[14] Some of the ratios computed in this document differ from those presented in the September Staff Update. Appendix E explains who this is the case and discusses the various ways students are counted in different CSDE data sets.

education teacher for every 80 students are the healthiest in terms of meeting all students' educational needs and are better able to absorb routine fluctuations in student load (e.g., identification or enrollment of a new student with a disability). He and his colleagues categorize schools in the range of 80 to 100 students for every special education teacher as "precarious" in their ability to serve all students with and without disabilities. He recommends that schools avoid relying on paraprofessionals in place of certified special education teachers and cautions that high special educator density cannot be compensated for by hiring greater numbers of paraprofessionals, who are not certified teachers.

The statewide ratio in Connecticut is 97 students for each special education teacher. Figure III-3 shows the number of students per special education teacher in most of Connecticut's 166 districts.[15] Each triangle in the figure represents one district, with the left-most points representing districts in DRG A and the points on the far right representing districts in DRG I. The 97:1 ratio is within Dr. Giangreco's "precarious" range of 80-100 students per special educator, and most districts are in this range or close above it. As shown by the trend line, within DRGs A and B there are, on average, more students per special education teacher (102:1 in DRG A and 107:1 in DRG B) than there are in DRG I (93:1), although DRG H has a similar mean special educator density to DRG B (106:1). The districts that most greatly exceed the 80-100 students per special education teacher recommendation are those appearing one-half to two-thirds across the figure, which would be some of the districts in DRGs B, D, and E. The DRGs with one or more districts significantly below the "precarious" range are C, D, E, F and G.

Figure III-3. Special Educator Density (CT, 2012)



Source: PRI staff analysis of SDE data

Special Education Student to Special Education Teachers. A more familiar measure of "special educator density" is simply the reporting of the number of special education students per special education teacher. This ratio gives an idea of each special education teacher's caseload

[15] One district in DRG E is omitted as an outlier reporting over 200 students per special education teacher. The exclusion of this district permitted the use of a scale that shows special educator density in the remaining districts with more accuracy.

within a particular district – the average number of students for whom each special education teacher must create IEPs, attend PPTs, and conduct or oversee regular evaluations and data collection to document progress toward individual goals and objectives. Generally, PRI staff was told by special educators and administrators that a maximum special educator caseload should be 14 or 15 students, but that it might be lower based on students' needs and educational placement. For example, an appropriate ratio in a self-contained classroom might be 10 students or fewer to one teacher.

There is much less variation in this metric across Connecticut districts and DRGs. The statewide average ratio is 12:1. Across DRGs, even DRGs H and I have mean special education student to special education teacher ratios of only 13:1. In fact, there is the least variation in this ratio in DRG I, with the lowest districts having a ratio of 11:1 and the highest of only 15:1. The individual districts with the highest ratios – over 20:1 – are included in DRGs E and G, while the individuals districts with the lowest ratios can be found in DRGs B and F. Thus, as a whole, Connecticut has a special education student to teacher ratio that is in line with recommendations, and the existence of individual districts that depart significantly from this metric does not suggest any trend by DRG.

Paraprofessional density. Turning to the metrics regarding paraprofessionals, these could, perhaps, be highly informative at an individual school or district level but are of limited utility on any aggregated level. This is because unlike special education teachers, it is not possible to know what tasks and duties are routinely performed by any individual or group of paraprofessionals. Nor is there an accepted or recommended ratio of students to paras or paras to teachers within either general or special education to use as a benchmark for appropriate use.

All Students to all NCIS: Unlike special education density, the use of an all student-to-all paraprofessionals metric was chosen less for theoretical reasons than for practical reasons. Initially, this metric was calculated as part of an exploration into whether the decrease in non-special education paraprofessionals may be resulting in reduced services to students who have not been identified as in need of special education. That analysis appears in Appendix F. Additionally, most paraprofessionals are not assigned to exclusively one student or one self-contained environment. Administrators PRI staff talked to indicated that even special education paraprofessionals are typically considered and treated as a resource for not just special education students but for the teacher, classroom, or grade level with which they work.

PRI research determined that no numeric staffing standards exist for paraprofessionals, unlike for teachers, where maximum general class size ratios are somewhat common. While Connecticut has no statewide mandates for class size for teachers, 27 states have imposed such ratios, and 16 of those states include non-certified instructional staff as factors in the ratio.[16] In other words, the class-size ratio could be adjusted upward if a paraprofessional were also present in the classroom. PRI staff were told that a few districts in Connecticut have class size ratio for teachers established in collective bargaining agreements, but no such standards were identified in the CBAs regarding paraprofessionals.

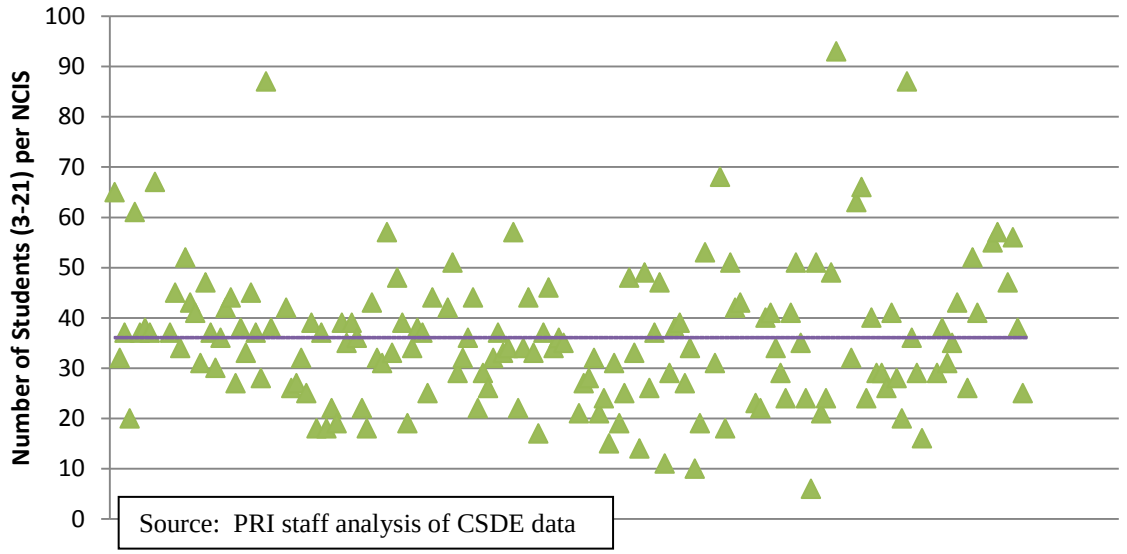
[16] Education Commission of the States. Class Size Policies Database, 2014

Standards for special education staffing are much more difficult to set given the complexity of student needs, and other factors. PRI found that while states may require these factors to be considered when staffing for special education, the study found no ratios that could be used as a gauge to measure district staffing of paraprofessionals.

Calculating any ratio of students to paraprofessionals may be helpful in district or school level analyses, where it might be fruitful to consider how these ratios compare to similar measures in similar schools. While doing so, however, it would be very important to consider not just raw numbers but the factors that may be at play in circumscribing the available labor pool, physical space considerations, and instructional support needs across both the general and special education student body before arriving at any conclusions regarding whether such ratios give reason for concern.

Figure III-4 shows NCIS density for most of Connecticut's 166 districts,[17] again ordered from DRG A on the left to DRG I on the right. As with the Figure III-3 showing special educator density, each triangle represents one district and the majority of districts at both ends of the figure hover around the mean of 36:1 (depicted by a purple line), demonstrating that there are not significant differences between the paraprofessional staffing ratios in the most advantaged and most challenged districts. Both DRG A and DRG I have average NCIS density that is slightly higher than the statewide median (44:1 for DRG A and 46:1 for DRG I).

Figure III-4. NCIS Density (CT 2012 All Districts, n=165 districts)



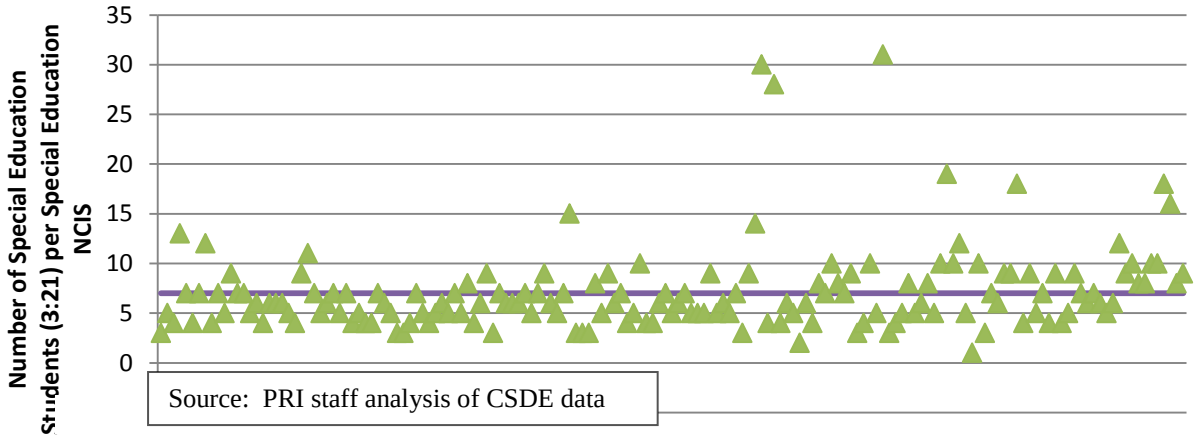
Special Education Students to Special Education NCIS: A ratio of special education students per special education NCIS that is noticeably lower than the ratio of special education students to special education teachers is sometimes relied upon to suggest that special education

[17] One district in DRG E was omitted from this analysis as any outlier in order to provide more visual contrast among the ratios for the districts closer to the mean. The omitted district reported numbers suggesting an all-student to all-NCIS ratio of 200:1.

students are spending more instructional time with paraprofessionals than with certified teachers, but this is not necessarily the case. How much instructional time individual students spend with non-certified versus certified staff will depend on: the student's disability service category and personal needs; whether the paraprofessional is assigned on a 1:1 basis or working with different small groups through the day; or whether the para is used most frequently to assist the teacher in indirect instructional tasks, such as administering quizzes and tests and collecting and recoding data performance data. Whether the ratio is so high or so low as to be of concern can only be assessed on a more individualized level that takes into account the many factors, including but not limited to special educator density, many of which cannot be easily quantified.

Across all LEAs, there were approximately 7 identified children per special education paraprofessional (a 7:1 ratio).[18] This ratio ranged from a low of 1:1 in one district in DRG F to a high of 31:1 in one district in DRG E. Figure III-5 depicts this metric for each Connecticut district, with districts in DRG A on the left and those in DRG I on the right. The horizontal line represents the statewide average.

Figure III-5. Special Education Students per Special Education NCIS (CT 2012, n=161 districts)



As with most other ratios, DRG E has the largest range, as reflected by the three markers above 25 special education students per special education NCIS along with several markers representing fewer than 5 special education students per special education paraprofessional. The other DRGs with large ranges are DRGs F and G. DRGs I, at the far right end of the chart, is the only DRGs with noticeably more special education students per special education paraprofessional than the statewide average, with an average ratio of 12:1. In fact, in DRG I, even the district with the lowest student-to-NCIS ratio had a ratio higher than the average ratio across all 161 included districts.

[18] For purposes of this ratio Darien is omitted from DRG A. The data submitted to SDE for the 2012-13 school year indicated that there were only nine special education paraprofessionals in a district with over 500 special education students, this was not only an extreme outlier but it was also reported at a time when there was a great deal of upheaval in Darien's special education system. Rather than include Darien as an outlier district, PRI staff elected to omit it from any analyses of NCIS so as maintain the validity of the data for purposes of comparison with other DRGs.

Special education paraprofessional to special education teacher ratio. A final metric that can be considered in evaluating staffing levels in individual districts is the ratio of special education paraprofessionals to special education teachers. Again, this metric is focused on special education staffing, due to the high percentage of paraprofessionals statewide that are identified as special education paraprofessionals. In addition to responsibilities to the entire school population in general, and for identified special education students in particular, special education teachers typically must guide, direct and monitor the activities of special education paraprofessionals to ensure that they are appropriately supporting the delivery of services called for in individual student IEPs.

PRI heard about both the benefits and drawbacks of paraprofessionals, particularly special education paraprofessionals. Having a number of NCIS to assist in the delivery of services can make the work of a special education teacher easier, allowing the delegation of appropriate support tasks. On the other hand, it can also make the special education teacher's work more difficult, or less fulfilling, particularly if the teacher became a special education teacher in order to work directly with students and now spends much of his or her time overseeing the work of paraprofessionals. If a special education teacher must oversee the work of three or four paraprofessionals, and has a caseload of 14 to 15 students, it is easy to see how his or her job might involve much more monitoring, administration, and paperwork than direct instructional time with students.

The average ratio of special education NCIS to special education teachers in Connecticut is just under 2:1. Eighty percent of all districts have a ratio of 2:1 or lower. In only 15 districts are there more special education teachers than special education paraprofessionals (a ratio lower than 1:1). Those 15 districts are scattered among the DRGs and do not include three districts for which no data was filed with CSDE regarding the number of FTE NCIS employed in the district. The 30 districts that have a ratio of 3:1 or greater are also scattered across the DRGs. Thus, no generalizations can be made about districts that tend to have higher special education NCIS to certified special education teachers. Instead districts must assess the appropriateness of their staffing patterns on a more individualized basis, again taking into account both quantifiable and non-quantifiable factors.

Percentage of all special education instructional staff who are paraprofessionals. In considering the impact that the ratio of special education paraprofessionals to special education teachers may have on service delivery, some find it more helpful to conceptualize the percentage of all special education instructional staff that consists of non-certified paraprofessionals rather than certified special education teachers. Interestingly, with the statewide average being 63 percent, the two DRGs in which the average is noticeably lower are DRG I, with an average of 53 percent and DRG A, with an average of 57 percent. Only DRG C is markedly higher, with an average of 68 percent of special education instructional staff being non-certified. In other words, in both DRG A and DRG I there are, on average, fewer special education paraprofessionals and more special education teachers than in other DRGs.

Through interviews with administrators from districts in different DRGs, it appear that there are lower percentages of special education staff who are paraprofessionals in DRGs A and I

for significantly different reasons. In the better resourced districts, like those in DRG A, there may be greater availability of special education teachers seeking employment. There may also be more parents with higher education and income levels, insisting on service delivery from certified staff or requesting outplacement to specialized special education program. There may also be greater awareness of some of the concerns that have been raised about overreliance on paraprofessionals for service delivery.

In the less well-resourced districts, such as those in DRG I, PRI staff were told that it can be challenging to find qualified individuals to fill paraprofessional positions. In some situations this is because the duties to be performed (e.g., personal care of students and/or physical behavior management) are considered undesirable. In other situations it may be that paraprofessionals are needed for duties that require training and experience (e.g., implementing ABA programs) that many applicants do not have. In addition, or alternatively, it is quite possible that districts in DRG I might have such resource constraints that they are simply forced to rely on fewer paraprofessionals than might be hired in a district with more resources.

Summary

Table III-5 summarizes some of the ratios presented in this chapter by DRG. This illustrates primarily that there are no strong trends in paraprofessional staffing that correspond with DRG assignment. Metrics relating to paraprofessional staffing seem to relate much more to factors within individual districts than to any general observations that can be made about community characteristics. The one exception is DRG I.

Table III-5. Selected Staffing Metrics by DRG

	All Students per Special Education Teacher	Special Education Students per Special Education Teacher	All Students per All NCIS	Special Education Students per Special Education NCIS	Special Education Paraprofessionals per Special Education Teacher
DRG A	102	11	44	7	1.6
DRG B	107	11	41	6	1.9
DRG C	95	12	32	5	2.2
DRG D	95	11	35	6	2.0
DRG E	91	12	32	8	2.0
DRG F	91	11	36	7	2.2
DRG G	93	12	38	7	1.9
DRG H	106	13	37	8	1.6
DRG I	93	13	46	12	1.3
Statewide	**97**	**12**	**37**	**7**	**2.0**

Source: PRI staff analysis of CSDE data

DRG I includes seven districts educating 18 percent of all Connecticut students. It has the highest average special education identification rate of 15.1 percent. The above metrics show that it has fewer students per special education teacher and more students per paraprofessional than the other DRGs, although with the identification rate being higher than other districts it has a similar number of special education students per special education teacher. These metrics may indicate that students and staff within DRG I districts and schools have significantly different experiences around hiring, retaining and utilizing NCIS than do districts and schools in other DRGs. *PRI believes that these metrics should be examined as part of focused monitoring and other CSDE activities related to its general supervision of the delivery of special education and related services with the hope of developing an increased understanding of how paraprofessional staffing relates to some of the other challenges facing individual districts.*

Chapter IV

Paraprofessionals and Student Outcomes

Given the widespread use of paraprofessionals in U.S. schools, there is surprisingly little research into the impact paraprofessionals have on student achievement and improved educational environments. In 2007 one researcher summarized: "Despite the extensive use of paraprofessionals in myriad critical roles in both general and special education environments, their effectiveness has gone virtually unstudied."[19] Things have changed little since this observation was made. Despite the small number of relevant studies, there is general consensus on promising and best practices to utilize paraprofessionals to enhance student outcomes. Findings from existing research, which will be described in more detail in the sections that follow, can be summarized as follows.

- There is fairly strong evidence that when appropriately trained and supported to deliver research-based interventions, paraprofessionals are effective at improving student performance, particularly in literacy programs in the early elementary years.

- There is no evidence that assignment of paraprofessionals to assist in general education classrooms leads to improved outcomes for all students or for students with disabilities generally.

- There is some evidence that the presence of paraprofessionals in both general education classrooms and special education classrooms can result in more teacher time being spent on instruction, more student time-on-task, and increased interaction between students with disabilities and their non-disabled peers.

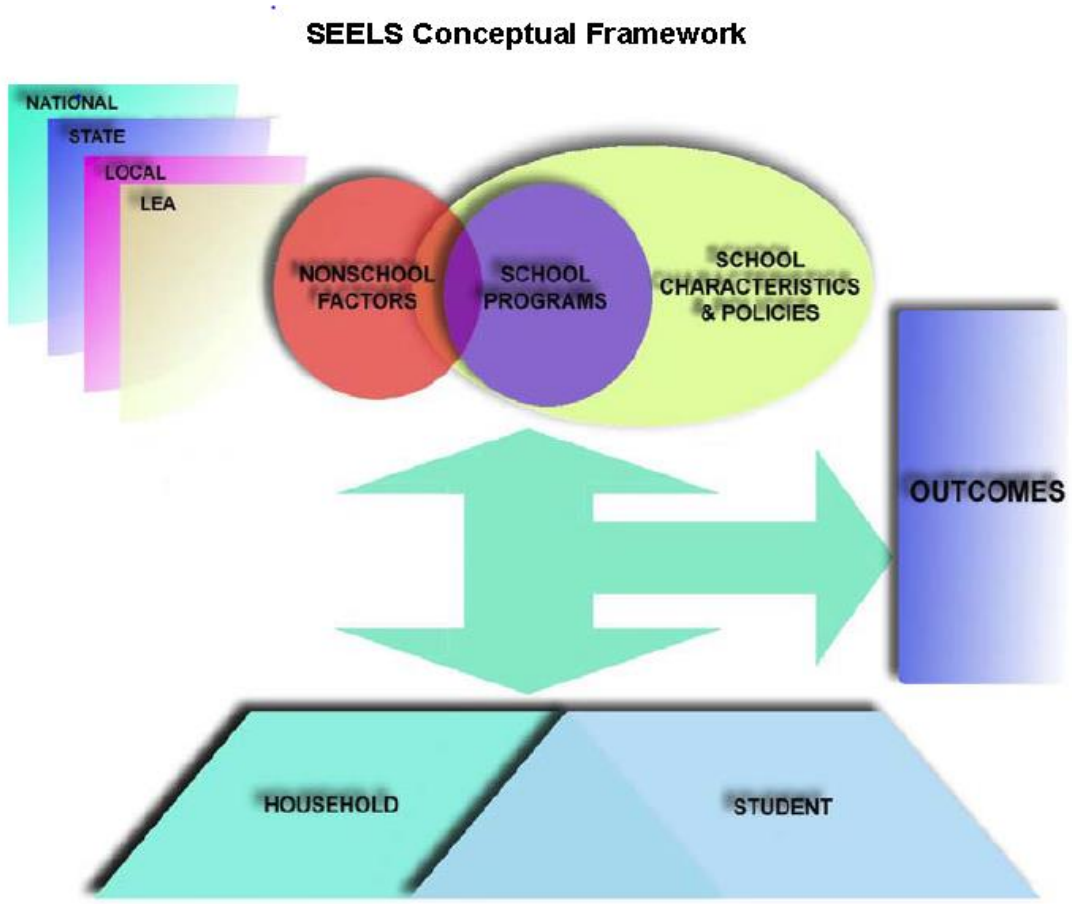
There is really no data available to conduct an in-depth investigation of the impact paraprofessionals have on student achievement in Connecticut schools. Such an investigation would require, at the very least, documentation of which students received support from paraprofessionals, at what times, and for what purposes. Ideally, there would also be some knowledge of whether the paraprofessionals were trained, observed, evaluated, or supervised to allow for an accurate description of what each paraprofessional was doing when working with students. Finally, there would have to be a general agreement on what outcomes were being measured, and how those outcomes related to the presence or duties of paraprofessionals.

Challenges Inherent in Linking Paraprofessionals to Student Outcomes

As with many other practices in elementary and secondary schools, it is extremely difficult to find a direct link between the use of paraprofessionals and student achievement. Figure IV-1 illustrates one conceptual framework for understanding the factors influencing the outcomes of the public education process for individual students, and why it is so challenging to isolate any one factor and measure its impact.

[1919] Quilty, K.M. (2007). Teaching paraprofessionals how to write and implement social stories for students with autism spectrum disorders *Remedial and Special Education*, 28:3, pp. 182-189.

Figure IV-1. Conceptual Framework of Factors Impacting Student Outcomes



Source: SRI International (2007)

The framework depicted in Figure IV-1 was developed by researchers conducting the Special Education Elementary Longitudinal Study (SEELS). SEELS was funded by the Office of Special Education Programs (OSEP) in the U.S. Department of Education as part of the national assessment of the IDEA. From 2000 to 2006, SEELS documented the school experiences of a national sample of students receiving special education as they moved from elementary to middle school and from middle to high school. The overarching purpose of the study was to quantify how various factors influenced the outcomes of students with disabilities over time. The factors examined included: age, gender, race/ethnicity, household income, family expectations for education, family involvement with school, social skills, classroom task persistence, placement in general or special education classes, class size, teacher competence in teaching reading, curricular modifications, and having accommodations such as slower pace of instruction, modified grading standards, or paraprofessional support. Most, if not all, of these factors are relevant to the outcomes of all students, not only students with disabilities.

What Figure IV-1 shows is that within the legal and regulatory frameworks established by the federal, state and local government, any individual school's characteristics and programs are influenced by, as well as influencing, a student and his or her family system. This is in

addition to non-school factors that might also influence a school's characteristics and programs. Student outcomes emerge from an intersecting of all of these factors. For any particular outcome, it is difficult to identify whether it was a specific school program or policy – such as its use of paraprofessionals – that contributed to the result, and, if so, to what extent.

Further complicating the linkage of student outcomes to the use of paraprofessionals is the question of what results are to be linked to what specific practice. Should, for example, a student's score on a 10th grade CAPT test be linked to the presence of paraprofessionals in his or her elementary school, or only to the presence of a paraprofessional in one or more of his or her high school classrooms? To what extent should the presence or absence of a paraprofessional be considered more determinative of the outcome than the caliber of the teacher, or the fact that the student lives with a family that sets an expectation for future college attendance? Even the consideration of non-academic outcomes poses this challenge. For example, could a low rate of absenteeism or suspensions in middle school be based on having received paraprofessional support in elementary school?

Existing research into the potential impact of paraprofessionals on student achievement can be divided generally into research that finds positive connections between the use of paraprofessionals to implement specific research-based interventions, particularly in literacy and at the early elementary level, and research that finds little or no impact on student academic outcomes when paraprofessionals are used in general education or inclusive education settings.

Paraprofessionals Can Effectively Support Increased Student Literacy

As early as the 1960s, there were research findings that students in kindergarten classrooms with a teacher's aide made gains in reading readiness that were greater than those of students in classrooms in the same schools without aides.[20] It should be noted that even in that early study the aides received significant training, which is still not the norm for teachers' aides employed in many U.S. schools.

Fast forwarding to the 21st century and the age of evidence-based interventions, there are now several studies showing that when paraprofessionals are used in the delivery of structured literacy curricula in the early elementary grades students make greater progress in literacy than do students not receiving such interventions.[21] It should be noted that these studies do not indicate that paraprofessionals are more effective than teachers, although there was some indication that under some study conditions paraprofessionals were equally effective. The studies do clearly demonstrate that, for students identified as in need of assistance in the targeted area, the receipt of the intervention from an appropriately trained and supported paraprofessional is clearly preferable to no intervention at all.

[20] Bennett, W.S., Jr & Falk, R.F. (1970). *New careers and urban schools: A sociological study of teacher and teacher aide roles*. New York: Holt, Rinehart and Winston.

[21] See, generally, Causton Theoharis, J.N., Giancreco, M.F., Doyle, M.B., and Vadasy, P.F. (2007). Paraprofessionals: The "sous-chefs" of literacy instruction. *Exceptional Children*, Sept/Oct 2007 pp. 56-62; and Farrell, P., Alborz, A., Howes A. and Pearon, D. (2010). The impact of teaching assistants on improving pupils academic achievement in mainstream schools: a review of the literature. *Educational Review*, 62:4 pp. 435-448.

In almost all of these targeted intervention studies, the gains that were measured were based on testing immediately before and immediately after the intervention was conducted. The studies do not establish whether any long-term gains might be attributable to the intervention. In addition to training and support in delivering the intervention, the paraprofessionals involved had been recruited specifically to conduct the intervention and were both trained and periodically monitored by the researchers, to ensure that they were continuing to follow the protocol being tested with fidelity.

The bulk of studies in which paraprofessionals have been shown to be effective in delivering a specific educational intervention have involved literacy in early elementary grades. There are other studies testing the utility of interventions rather than the utility of paraprofessionals that conclude that properly trained paraprofessionals can deliver other kinds of interventions as effectively as teachers,[22] but these are of limited relevance to the issues surrounding the use of paraprofessionals in local and regional school districts.

No Evidence that Paraprofessionals Impact Classroom or School-wide Achievement

A second and smaller group of studies attempts to link certain outcomes of all students in a class or school to the presence of paraprofessional support. There are fewer of these studies because they are much harder to conduct and must, to at least some extent, control for some of the other factors that are known to correlate with student achievement, particularly gender, race/ethnicity, and socio-economic status. Once controlling for all these other factors, these studies indicate that the presence of paraprofessionals has no clear and consistent effect on the average attainment of pupils within a classroom or school.[23] In one of these studies, an offshoot of Tennessee's Project STAR, it was specifically found not only that average academic achievement scores of students in classrooms staffed with a paraprofessional were not significantly higher than those in classrooms without paraprofessionals, but that they were significantly lower than the average scores in classrooms with fewer students.[24,25]

One of the limitations of this group of studies is that it fails to take into account that paraprofessionals are increasingly being used not to support classrooms but to support individual students, particularly those with IEPs. Researchers involved in these studies note that paraprofessional support, particularly when provided to meet the specific needs of one student or a small number of students, may affect the test scores of those individual students. This would, in fact, be consistent with the findings of the targeted intervention studies that show that carefully designed interventions, when carried out by well-trained and monitored paraprofessionals, do lead to at least short-term gains in certain skills, particularly in the area of literacy.

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[22] Jameson, J.M., McDonnell, J.; Johnson, J.W.; Riesen, T.**;** Polychronis**, S. (2007).** A comparison of one-to-one embedded instruction in the general education classroom and one-to-one massed practice instruction in the special education classroom. *Education & Treatment of Children*, 30:1, pp. 23-44.

[23] Farrell, P., Alborz, A., Howes A. and Pearon, D. (2010). The impact of teaching assistants on improving pupils academic achievement in mainstream schools: a review of the literature. *Educational Review*, 62:4 pp. 435-448.

[24] Gerber, S.B., Finn, J.D. and Achilles, C.M. (2001). Teacher aides and students' academic achievement. *Educational Evaluation and Policy Analysis*, 23:2 pp. 123-143.

[25] The Tennessee Project STAR study is most often cited for its findings that decreasing class size is one of the best ways to improve student performance.

Paraprofessionals May Inhibit Student Achievement

As illustrated in Figure IV-1, the myriad factors that impact student achievement make the process of data collection and analysis for a meaningful examination of individual student outcomes as possibly related to paraprofessional support is extremely difficult. There are a great number of variables that must be accurately captured and a great number of students across schools and districts for whom this must be done. PRI staff was able to locate two studies in which appropriate variables were captured on a large enough scope to allow this sort of analysis. One was done in the U.S. based on data collected from 2000-2006 and one in the U.K. using data collected between 2003 and 2008.

In the U.S., the OSEP funded SEELS followed a nationally representative group of students with disabilities over a five-year period. For each student, teachers completed questionnaires which included questions in which one questions allowed the teacher to indicate whether or not the student received any assistance from a teacher's aide. It should be noted that the frequency and duration of the teacher's aide's support, or whether such support was exclusive or shared with other students, was not captured in the SEELS data. The SEELS questionnaire only asked if the student received support from a teacher's aide.

On the academic attainment side, the SEELS team found that the students identified as receiving assistance from a teacher's aide tended to perform at a lower level academically than similar students who did not receive such assistance, especially in regard to oral reading fluency and reading comprehension. Because the SEELS study was documenting what happened to special education students over time, and was not introducing paraprofessional support as an intervention, it is not possible to know whether students were receiving paraprofessional support because they were lower performing or were lower performing because they received such support. What could be determined was the lack of a significant correlation between receiving services of an instructional assistant and increases in test scores over time. The study authors specifically noted that their findings "point up the difficulty in disentangling receipt of such accommodations and supports from the academic difficulties that underscore the need for them."[26]

A similar longitudinal study conducted in the U.K., the Deployment and Impact of Support Staff Project (DISS), was funded by the English and Welsh governments. It employed slightly different methods, including classroom observation of individual students and their teachers and teacher's aides, while also looking at the linkages between paraprofessional support and individual student achievement.[27] That study's findings regarding the impact teacher aides had on academic achievement were negative. At both the elementary and secondary levels, there was a negative correlation between the amount of paraprofessional support a student received and the amount of progress made in English and mathematics in the course of the year.

[26] Wagner, M. and Blackorby, J. (2007). Chapter 9 - What we have learned, p. 9-7. In Blackorby, J. et al. *What makes a difference? Influences on outcomes for students with disabilities*. SRI International, Menlo Park, CA.
[27] Blatchford, P., Bassett, P., Brown, P. & Webster, R. (2009). The effect of support staff on pupil engagement and individual attention. *British Educational Research Journal*, 35:5 pp. 661-686; and Blatchford, P., Bassett, P., Brown, P., Martin, C., Russell, A., and Webster, R. (2011). The impact of support staff on pupils' 'positive approaches to learning' and their academic progress. *British Educational Research Journal*, 37:3, pp. 443-464.

Of particular concern were findings from an observational component of the DISS study suggesting possible explanations for this negative correlation. First, the researchers observed that the more paraprofessional support a student received the less support he or she received from the classroom teacher. Second, they observed that when interacting with students, paraprofessionals tended to be most concerned with task completion rather than ensuring that the student was learning and understanding the material.

Each of these observational findings is often highlighted by critics of "overreliance upon paraprofessionals" in special education. These critics contend that assigning paraprofessionals to assist students with disabilities who are struggling academically may result in depriving those students of appropriate amounts of instructional time with highly qualified teachers. Even if unintentional, this would specifically violate the NCLB, which requires instruction only by certified teachers. Moreover, if paraprofessionals are in fact more focused on task completion than on ensuring student engagement and mastery, critics maintain that some paraprofessionals may, albeit unintentionally, provide the student correct answers or otherwise complete work for the student, further impeding the learning process while also contributing to the student's sense of dependence upon the paraprofessional and his or her feelings of inadequacy to perform academic work without adult assistance.

Non-Academic Impacts of Paraprofessionals

Despite the concerns that have been raised about over-reliance on paraprofessionals, there are indications that paraprofessionals may contribute to the educational environment in positive ways that are indirectly related to student achievement. These are by: (1) increasing the amount of time teachers can spend providing instruction; (2) assisting students with maintaining behaviors conducive to classroom learning; and (3) increasing peer interactions.

It was a study funded by The Ford Foundation in Park City, Michigan in the 1950s that first suggested that paraprofessionals assisting with classroom clerical tasks might free the teacher for greater amount of instructional time.[28] Although that study did not provide evidence of increased student achievement, there were measurable increases in the amounts of time teachers were able to spend planning lessons and supervising students.

More recently, a 2012 article reported the results of a study of paraprofessional implementation of a protocol for managing the behavior of children placed in special education classrooms due to their emotional and behavioral needs.[29] The researchers found that under study conditions, which included both a period of time in which paraprofessionals were monitored by the researchers and times when they were not, there was an increase in the amount of time teachers spent providing instruction.

[28] Park, C.B. (1956). The Bay City, Michigan experiment: A cooperative study for the better utilization of teacher competencies. *Journal of Teacher Education*, 7, pp. 99-153.

[29] Maggon, D.M., Fallon, L.M., Hagermoser Sanetti, L.M., and Ruberto, L.M. (2012). Training paraeducators to implement a group contingency protocol: direct and collateral effects. *Behavioral Disorders*, 38:1, pp. 18-37.

Other studies demonstrate a similar impact. For example, the DISS study in Great Britain[30] did show that when teacher's aides were present teachers spent more time providing instruction. It must be kept in mind, however, that the students with special education needs who were working directly with the paraprofessional were shown to receive less of the teacher's attention. Similarly, a 2001 study of classrooms with and without teacher aides found a small association between teacher's aides performing more clerical work and student attainment while, at the same time, aides spending more time with a student was associated with lower student attainment. That study's authors suggested this was consistent with the most effective use of teacher aides being the performance of tasks that gave the teacher greater opportunities to spend time providing instruction.

There are also research findings that teachers reported higher levels of job satisfaction and reduced stress when paraprofessionals were present.[31] In both of these studies, consistent with the above findings that teachers were able to spend more time teaching, they also spent less time addressing negative student behavior. It should be noted that one of these studies took place in a self-contained classroom rather than a general education classroom, and the paraprofessionals were specifically trained to implement a behavior improvement protocol. Thus, it may be more akin to the studies of paraprofessionals delivering research-based interventions than to general classroom environment studies. In neither of these studies was there quantifiable evidence of improved academic outcomes for students. Nevertheless, these studies support the practice of developing specific classroom behavior management plans and training paraprofessionals to implement them with fidelity. In such conditions teachers are likely to experience less stress and greater job satisfaction.

A few studies suggest that some students are better able to remain on-task in the classroom when a paraprofessional is present. Interestingly, in the DISS study it was the students who did not have special education needs who had a greater ability to remain on task when paraprofessionals were present in the primary school setting, while students who were identified as having special education needs who were observed to spend more time on task when paraprofessionals were present at the secondary level. This may relate to the fact that at the primary level paraprofessionals were most often observed working with groups of students whereas at the secondary level paraprofessionals were most often observed working with a single student.

Although peer interaction is not directly tied to academic achievement, there are many reasons that educators believe it is linked to more positive post-school outcomes. In fact, the perceived benefits of being with typically developing students who do not have disabilities is one of the reasons for the least restrictive environment (LRE) provision of the IDEA. The extent to which students with disabilities are educated in the LRE is monitored by the federal government, which tracks the numbers of all students with disabilities by the amount of time spent in

[30] Blatchford, P., Bassett, P., Brown, P. & Webster, R. (2009). The effect of support staff on pupil engagement and individual attention. *British Educational Research Journal*, 35:5 pp.661-686.

[31] Blatchford, P., Bassett, P. Brown, P. Martin, C., Russell, A. & Webster, R. (2009). Research Brief: Deployment and Impact of Support Staff Project. DCSF-RB 148. Department for Children, Schools & Families. London, U.K. Maggon, D.M., Fallon, L.M., Hagermoser Sanetti, L.M., Ruberto, L.M. (2012). Training paraeducators to implement a group contingency protocol: direct and collateral effects. *Behavioral Disorders*, 38:1, pp. 18-37.

environments with their non-disabled peers. This federally tracked metric of time with non-disabled peers (TWNDP) is discussed in Appendix F.

Some studies, albeit on a very small scale, have demonstrated that educating paraprofessionals about the importance of peer engagement and training them in specific strategies that can be used to facilitate peer engagement results in at least short-term gains in the frequency of interaction with typically developing peers in general education classroom.[32, 33] Similarly, there are studies demonstrating that paraprofessionals can effectively develop and implement "social stories" for use with students with autism to decrease instances of maladaptive behavior that interfere with the learning process.[34]

Connecticut's Data

As noted, there is no way to identify which Connecticut students have and have not worked with paraprofessionals, either 1:1 or in small group or classroom settings. Nor is there any principled way to identify any outcomes that may logically bear on the use of paraprofessionals in all school districts, given the difficulty in knowing exactly what all or even most paraprofessionals do in each school district. Nevertheless, PRI staff looked for correlations between proxies for student outcomes and the use of paraprofessionals – as measured by the number of students per paraprofessional – and found a single small significant correlation. More students per paraprofessional correlated with a higher district-wide chronic absentee rate. What this demonstrates, in concert with the lack of correlation with any other variable tested, is that most measures of student performance are more likely to be linked to other factors, especially the factors that are taken into consideration when assigning districts to DRGs.

Illustrating indirectly how other quantifiable factors are more closely related to student outcomes, Table IV-1 provides DRG averages on the following data points:

- All student four-year graduation rate;
- Special education student four-year graduation rate;
- CMT District Performance Index score;
- CAPT District Performance Index score; and
- Percent of students chronically absent (missing 10 or more days of school in year).

The four-year graduation rate for all students and the district performance indices for both the CMTs and CAPTs tell the story most clearly. Moving from the DRG with the highest to the DRG with the lowest median household income also reflects decreasing mean test scores and graduation rates. This is broadly consistent with the large bodies of research that suggest educational performance and attainment is strongly linked to socio-economic factors. Thus,

[32] Causton-Theoharis, J.N. and Malmgren, K. W. (2005). Increasing peer interactions for students with behavioral disorders via paraprofessional training. *Exceptional Children*, 71:4, pp. 431-444.
[33] Malmgren, K.W., Causton-Theoharis, J.N., and Trezek, B. J. (2005). Increasing Peer Interactions for Students With Behavioral Disorders via Paraprofessional Training. *Behavioral Disorders*, 31:1, pp. 95-106.
[34] Quilty, K.M. (2007). Teaching paraprofessionals how to write and implement social stories for students with autism spectrum disorders. *Remedial and Special Education*, 28:3, pp. 182-189.

most of these measures will be expected to significantly correlate with each other, not because there is a causal relationship but because both are driven by independent factors that tend to influence each measure positively.

Table IV-1. Selected Student Outcome Measures by DRG

	All Students – Four-Year Gradation Rate	Special Education Students – Four-Year Graduation Rate	CMT DPI	CAPT DPI	Chronic Absenteeism Rate
DRG A	97.8	86.0	94.4	93.3	7.7
DRG B	95.7	80.4	92.2	88.5	5.4
DRG C	93.0	77.7	89.9	84.5	6.1
DRG D	91.9	70.7	87.3	81.5	8.1
DRG E	91.6	80.7	86.3	80.9	6.9
DRG F	88.6	68.0	83.0	75.6	8.9
DRG G	80.5	58.3	76.5	67.8	12.0
DRG H	71.0	54.1	70.6	59.8	14.5
DRG I	65.3	45.2	57.4	47.3	21.2
Statewide	88.2	70.1	84.8	77.9	8.5

Source: PRI staff analysis of CSDE data

Summary

There is no theoretical reason to anticipate that in the aggregate, or as a general rule, the use of paraprofessionals is positively linked to student outcomes. A cursory examination of Connecticut data was consistent with such a null expectation. Any sort of mandate around hiring more paraprofessionals or ensuring a minimum student to paraprofessional ratio within classroom, grades, or schools would be inappropriate.

Current research does suggest, however, that on a smaller scale, that is to say within individual schools and classrooms, paraprofessionals can be used in ways that are likely to positively impact student outcomes. This can occur both indirectly and directly. The mere presence of paraprofessionals may be sufficient to increase both teacher time spent on instruction and teacher feelings of personal effectiveness. In addition, measurable gains in student learning, time-on-task, and peer interactions have been found in contexts where there is close attention to the training of paraprofessionals to implement specific protocols and monitoring of their performance to ensure fidelity to the intervention protocol. These findings from existing research should inform districts, administrators, schools, and teachers when decisions are made about the assignment of duties to paraprofessionals, how paraprofessionals are prepared for these duties, and how they are monitored, supervised, and evaluated when performing these duties.

Chapter V

State Department of Education Oversight

The study determined that how paraprofessionals are used in local school districts is to a great extent, determined by the districts themselves. Chapter II outlined the protections offered to unionized paraprofessionals regarding issues involving wages, working conditions, and unfair labor practices. This chapter outlines the role of the State Department of Education in ensuring education laws and regulations are implemented, including, when relevant, how paraprofessionals are utilized.

The CSDE has several oversight responsibilities in regards to school paraprofessionals. First the department is responsible for ensuring that federal laws regarding the No Child Left Behind (NCLB) and Individuals with Disabilities Education Acts, as outlined in Chapter I, are being followed.

No Child Left Behind: Paraprofessional Qualifications

In terms of NCLB, CSDE must ratify that any school or district receiving Title I funds has *qualified* instructional staff working with students. For schools in this category, all paraprofessionals in the relevant school or district would have to meet the standards of:

- 60 credits of higher education;
- an associate's degree, or
- a high school diploma and have passed the ParaPro assessment.

All Title I fund recipients had to ensure that all instructional paraprofessionals employed by them met the above standards by 2006. When the PRI committee conducted its 2006 study, this effective date had just occurred, and one of the recommendations was that CSDE monitor how districts were complying with Title I standards, and provide that information on its website.

It is more than seven years since the NCLB qualification requirements took effect, yet PRI finds that CSDE still does not maintain data accessible to the public on the numbers of paraprofessionals who work in Title I schools or districts and therefore need to meet the Title I requirements. While a review of district para job postings indicates that most districts are requiring that candidates meet the Title I requirements, there are many individuals taking the ParaPro test. Such individuals must only possess a high school diploma or they would not need to take the ParaPro test. CSDE simply does not know how many paras, employed in Title I programs, are working provisionally until they take and pass the ParaPro assessments.

Therefore, the PRI committee makes the same recommendation it made in 2006: **that CSDE summarize the information about Title I paraprofessionals that it will collect annually and post the information on its website. At a minimum, the posted data should include the number of paraprofessionals covered by NCLB, the number who have not met the NCLB requirements, the number of districts out of compliance, and the types of actions taken by the districts.**

General Supervision of IDEA Compliance: Focused Monitoring

SDE is also responsible for ensuring the provisions of IDEA, as outlined in Chapter I, are met. The federal Office of Special Education Programs (OSEP) requires state education agencies to monitor and report on the implementation of IDEA, which is done through a state's General Supervision System (GSS). There are several components of the general supervision system including focused monitoring, due process, and administrative complaints proceedings.

There have been several iterations of focused monitoring over the years. Previous efforts were carried out in only a few districts by teams of CSDE and/or CREC special education consultants who would conduct in-depth on-site reviews of how special education services were being delivered in each monitored district. Seven of these monitoring audits were conducted during 2011 and reported on CSDE's website. PRI found that services being provided by paraprofessionals as required by a student's IEP were often part of the monitoring assessment.

Due to concerns that the prior review procedures did not allow all districts to be regularly monitored, OSEP issued directives to states on how they could improve the process to better align it with the state strategic improvement plans (SSIPs). In response, the CSDE developed its current focused monitoring process, which first ensures that all districts are subject to monitoring periodically, with approximately 30 districts audited each year on a six-year cycle. The new process includes three phases, with each phase providing more intensive monitoring but also additional support and technical assistance to the monitored districts.

The first phase requires the 30 districts to report on 10 key data sets, such as disproportionate (by race) identification of disability, graduation/drop-out rates, suspension or expulsion rates for greater than 10 days, and least restrictive environment data. Districts are also asked to send a random sample of individual education plans (IEPs) for review.

After CSDE reviews the data and the IEPs, about half of the 30 districts must present additional information addressing those areas where the data show cause for concern. This second phase requires the districts to present what they believe are the root causes for the problem areas, and the current strategies being used to address them, as well as the district's plan to improve outcomes in that area.

Phase three identifies six to eight of the districts that participated in the second phase for further technical assistance and support, to be provided by a state consultant team. About half of these districts are receiving assistance in identifying aspects of programs and interventions that have brought them success in addressing their areas of concern, and to help them with continued improvement. The remaining districts designated to participate in phase three have demonstrated a more significant need for additional assistance. All of the districts designated for this phase participate in up to four in-district support/technical assistance sessions. The objective is to target improvement to the areas of data concern and to further the goals of the SSIP.[35] The districts are recommended to have key staff participate, including a data manager or a staff member who can

[35] The SSIP is to: identify systemic approaches that will lead to improved results for students with disabilities across key measures; support LEAs in identifying and implementing evidence-based practices that will result in changes in school and provider practices to advance improved results for students with disabilities; and to align the plan with other initiatives, beyond special education, which can have an impact on students with disabilities.

access the district data as the monitoring sessions occur. Other district members are the Director of Special Education, Superintendent or Director of Curriculum, at least two principals, and other staff as the district chooses.

This focused monitoring process was used for the first time in the 2013-2014 school year, so the outcomes of the third phase and implementation at the district level have not yet been assessed. CSDE anticipates that this information will be available in January 2015. Nevertheless, because of these changes in focused monitoring and the fact that reports are no longer issued, PRI was not able to review the findings of the phases, the strategies developed, or corrective action plans that resulted from the most recent process. However, PRI believes that it is important that paraprofessionals and how they are used in districts' special education programs be part of the focused monitoring process.

Therefore, PRI recommends that CSDE's focused monitoring process include an inspection of a random sample of IEPs to ensure that the language outlining paraprofessional services is written with enough specificity regarding amount of time a paraprofessional is to provide support to a student, and what that support entails. This will inform the consultant team, if that district is selected for phase-three assistance, on whether IEP specificity is an issue, and if so, allow the CSDE to provide technical assistance in writing IEPs. If the IEPs do indicate specifically what and how much paraprofessional assistance is to be provided, then the in-district focused monitoring sessions should examine whether the IEPs are being implemented.

General Supervision of IDEA Compliance: Due Process and Complaint Proceedings

Another way CSDE monitors local district implementation of IDEA is through CSDE's due process and administrative complaint processes. If an individual believes the federal IDEA law is not being followed there are two avenues that may be pursued.

Due process. The first complaint avenue involves making a request for a due process hearing at the State Department of Education. The issues appropriate to requests for a due process hearing are those relating to proposals or refusals to initiate a change in the identification, evaluation or educational placement of a child. Because such matters relate to the due process rights to a free and appropriate education of one child, the path for filing a due process hearing request is restrictive and only a parent or guardian, and in certain cases, school districts, may file. Thus, other organizations and individuals, including paraprofessionals, cannot.

Administrative complaint. CSDE also has an administrative complaint process in which any person or organization may file a complaint alleging a violation of any of the federal IDEA requirements, or any statute or regulation relating to the provision of special education to eligible children by a school district, CSDE, or any other public agency required to provide special education or related services. The document outlining this complaint process and the recommended form for filing such a complaint is reproduced in Appendix G.

PRI staff interviewed CSDE consultants responsible for handling these complaints. CSDE staff indicated the automated system where complaint information is stored cannot easily

be searched by complainant or complaint issue, but agency staff believes that they have received only a handful of complaints – perhaps five – involving paras over the past two years.

The fact that complaints are not searchable is only one flaw in CSDE's administrative complaint system. A more critical concern is that persons and organizations may not even be aware of the existence of the administrative complaint process. In the course of conducting this study, PRI staff heard repeatedly from paraprofessionals in some districts about potential infringements of the rights of the students with disabilities with whom they worked. One commonly occurring theme was that a single paraprofessional might be assigned to two or more students with IEPs calling for 1:1 paraprofessional support. This was explained to be problematic both because it deprived each individual students of the supports the PPT had determined the school was legally obligated to provide and because it placed the paraprofessional and all students to whom the para was assigned at risk.

Another frequent complaint shared with PRI was that a paraprofessional might be told to leave her typically assigned duties in order to cover a classroom either for a short period of time, or for as long as a whole period or even a whole day. This was explained to be of concern both in terms of potentially depriving one or more students of paraprofessional support called for in their IEPs and in terms of creating a situation where a class of students might not be receiving instruction from a certified educator for some length of time.

Some paraprofessionals, particularly those assigned to students receiving special education due to behavioral concerns, indicated that they felt inadequately trained in managing students' behavior and feared that when assigned to work with students who might act aggressively they were being put at risk for physical injury. Other types of interviewees also commented on the risks posed to paraprofessionals assigned to work with students with special behavioral needs.

PRI concludes that any of the above concerns raised by paraprofessionals would be grounds for filing an administrative complaint with CSDE alleging a violation of provision of special education services as called for in an IEP.

CSDE is required by IDEA and its implementing regulations to adopt written complaint procedures for resolving any complaint, by any individual or organization, and it is also required to widely disseminate the procedures for filing such a complaint.[36] However, PRI found that the CSDE's administrative complaint process information is not widely disseminated or publicized. One of the only places staff found the right of any individual or organization to file an administrative complaint clearly spelled out was in a much larger document titled Procedural Safeguards Notice Required Under IDEA Part B (SDE 2011) which is given to parents of special education students once a year, or after any of the following occurs:

- the first time the parent or the school district asks for an evaluation;
- the parent asks for a copy of the procedural safeguards;

[36] The requirements for state complaint procedures are found in the Code of Federal Regulations at 34 CFR §§300.151-300.153.

- the first time in a school year the parent requests a due process hearing or files a state administrative complaint; or
- a decision is made to take a disciplinary action against the parent's child that constitutes a change in placement.

Incorporating the administrative complaint procedures into a document directed primarily to parents is not wide dissemination to the people and organizations that might use the process. Neither is giving the document to parents after they have already demonstrated a concern regarding their child's rights as listed above. There is no available information of how the CSDE's disseminates a document titled Complaint Resolution Process, which is available on the Bureau of Special Education Resources website under the heading Legal/Due Process: http://www.sde.ct.gov/sde/lib/sde/PDF/DEPS/Special/Complaint_Resolution.pdf.

PRI concludes that the CSDE described procedures for distribution of the Procedural Safeguard and Complaint Resolution Process publications preclude a finding of wide dissemination.

Much of special education services, including what districts must provide and how, is outlined in state statutes and, in more detail, in special education regulations updated in 2013. While the procedures for requesting a due process are contained in the regulations, the administrative complaint process is not. Since there is no mention of the administrative complaint process either in state law or in the CSDE regulations pertaining to special education, and little information available through documents created by CSDE and available on its website, it is quite possible that paraprofessionals and the unions that represent them may not be aware of this process available to them to address their complaints.

To remedy this, PRI recommends that CSDE:

- **Seek to modify the state regulations pertaining to special education to include the process and procedures for filing an administrative complaint.**

- **Re-issue the CSDE's State Complaint Procedures from the Procedural Safeguards and/or Complaint Resoluation Process, along with a policy brief, and circulate to organizations and groups interested in special education services, including the School Paraprofessional Advisory Council.**

- **Place State Complaint Procedures from the Procedural Safeguards and/or Complaint Resoluation Process, as well as the single page complaint form, on its website in a manner that makes them easily accessible to the public.**

Another deficiency in the CSDE's administrative complaint process is that it does not make final report decisions easily accessible to members of the public. This creates a void in the available information about how well Connecticut's LEAs are doing in complying with the IDEA and in providing special education and related services in conformity with federal and state law. Table V-1 illustrates the approximate numbers of administrative complaints and due process complaints that are received or finally adjudicated by the CSDE each year.

Table V-1. CSDE Administrative and Due Process Complaints (2013-14)		
	Administrative (number/percent of total)	**Due Process** (number/percent of total)
Received Requests	198	234[†]
Withdrawn by Complainant (typically indicates negotiated resolution)	73 (37%)	208 (89%)
Final Report/Decision Violation/Order Against District	66 (33%)	5.5[*] (2%)
Dismissal Failure to Prosecute or Other Procedural Issue	N/A	7 (3%)
Dismissal/Finding of NO Violation	58 (29%)	10.5[*] (4%)
Still Pending/Consolidated Only Administrative Action Taken	1 (<.5%)	4 (2%)

[†]The CSDE assigned numbers to 237 complaints, but 3 were subsequently consolidated with other complaints for disposition.
[*]One case was identified by CSDE as a "split decision" with finding on some issues for parent/complainant and some issues for the district.

The data in Table V-1 indicate that there are far more decisions that find violations of the IDEA through the administrative complaint process than through due process proceedings. *PRI finds the absence of a system for making final decisions on special education administrative complaints accessible to the public compromises the ability of many potentially interested parties to research and monitor compliance with aspects of special education law at both the statewide and district levels, including in regard to effective and appropriate use of paraprofessionals.*

Greater transparency in this regard would benefit parents, citizens and taxpayers interested in better understanding the strengths and challenges faced by their LEA. Moreover, the availability of decision on all complaints, not just those claimed for due process hearings, would allow advocacy organizations such as the Connecticut Parent Advocacy Center and the Office of Protection and Advocacy for Persons with Disabilities, as well as lawyers and law firms representing both school districts and parents, to establish their own summarizing and indexing system to keep abreast of statewide trends in the reporting and remediation of district non-compliance with special education law.

Therefore, PRI recommends that the State Department of Education establish a system or systems whereby one or more of the following takes place:

(1) all final decisions on administrative complaints are written in a way that does not reveal the identity of individual students and are made available on CSDE's website in the same way as due process final decisions;

(2) a summary table is placed on CSDE's website and updated quarterly containing information to include: (a) type of complainant (parent, agency/advocacy organization,

LEA, other); (b) district or districts involved; (c) nature of complaint; (d) whether withdrawn, dismissed or going to final decision; (e) date of final decision; (f) if final decision includes findings of non-compliance the nature of the non-compliance; (g) any corrective action to be taken; (h) the data upon which follow-up monitoring confirms that corrective action has been taken; or

(3) interested individuals or organizations can, for a small fee, automatically receive copies of all final decisions on the merits on any administrative complaint, regardless of whether or not that complaint involves a request for due process.

Systematic complaints. In addition to the above procedure for making complaints about the failure of an LEA to properly serve individual students with disabilities, the CSDE has a mechanism whereby, at the discretion of consultants reviewing and investigating such complaints, CSDE can undertake an investigation into a potentially systemic failure of a district to comply with federal and/or state special education law. Based upon conversations with CSDE consultants responsible for the GSS, it appears that an investigation of a systemic complaint is usually triggered by a pattern of similar individual complaints in an individual district. Two recent examples of such systemic complaint investigations involve Darien and Hartford.

Darien. A 2012-13 investigation was triggered by a lawyer filing an administrative complaint on behalf of parents of over 20 different students claiming that the Darien school district was violating their rights in regard to participation in the process of developing IEPs for their children. Many different violations on the part of the district were identified through CSDE's investigation, including that Darien had adopted and implemented policies and procedures that did in fact deprive parents of the ability to participate in the development of their children's IEPs.

In one of the two reports issued by the CSDE in relation to the Darien investigation, there was an analysis of all complaints that had been filed against the district during 2012-13. The CSDE observed that the number of complaints involving Darien public schools for this year was twice the number of complaints filed in either of the prior two years, and that the number was four times the average for schools in its DRG. Five of fourteen complaints filed involved allegations that Darien was failing to implement student IEPs. Four of these five complaints had resulted in orders of corrective action by the district. The CSDE's use of its complaint database to include salient information about Darien's systematic noncompliance with IDEA illustrates how helpful access to administrative complaint reports would be for other interested persons.

Although PRI did not review the Darien complaints from 2012-13 to determine if any failures to implement involved failure to provide paraprofessional support, there is evidence that paraprofessional support may have been in issue for at least some students. A private consultant retained by Darien to help them address concerns about IDEA implementation issued a report that made several findings relevant to paraprofessionals. One finding was that some student IEP's inappropriately used the phrase "as needed" to specify the frequency and duration of paraprofessional support.

Hartford. The Hartford investigation was prompted, at least in part, by a report of an investigation by the Office of Protection and Advocacy into a systemic failure of the district to

provide appropriate and timely individualized education programs for students with emotional and behavioral disorders. The Hartford investigation revealed widespread failure of the school system in relation to its special education services, including an inability, in some instances, to even locate a child's IEP. In the 2011 report, CSDE investigators noted a number of issues dealing with paraprofessionals:

- delayed implementation of 1:1 paraprofessional services as outlined in students' IEPs; and

- confusion among district personnel regarding the distinction between the terms "adult support" and "1:1 paraprofessional" which can lead to delayed provision of 1:1 paraprofessional services because the service requested is not always the service the PPT intended.[37]

Hartford Public Schools was required to submit a corrective action plan in response to the investigation, and CSDE continues to oversee its implementation. According to staff at CSDE, there have been some improvements, but there is still a need to intensely monitor the district's delivery of special education services.

The findings around paraprofessionals in both the Darien and Hartford investigations are similar to complaints voiced by paras to PRI staff during the course of the study as well as in testimony received at two legislative public hearings: one held by the PRI Committee in September 2014, and another held by the Education Committee in March 2014. PRI believes that a statutory remedy to address these complaints is not appropriate, as it is not possible to address how paraprofessionals should or should not be used in such a broad manner. While it does not appear that paraprofessionals have historically used the special education administrative complaint process with any frequency, it is an avenue available to them. Further, with the previous recommendation to better inform the public of the availability of the administrative complaint process, it may focus more attention to problems occurring in districts and may contribute to the CSDE's ability to effectively oversee the delivery of special education services.

PRI finds that CSDE has a responsibility to lessen the confusion around the issue of "adult support" in IEPs and how to appropriately specify the frequency and duration of paraprofessional support. If CSDE were to issue a policy guidance brief stating that "adult support" and any form of support "as needed" is not acceptable IEP language that would certainly make the question of whether a district is providing services as required easier to determine. Further, such clarification should ensure better monitoring and prompter resolution of complaints.

Therefore, the PRI Committee recommends that the State Department of Education develop and distribute a policy brief stating that IEPs should be drafted in such a way as to clearly identify the type of employee (i.e., certified vs. non-certified) providing services and supports and to appropriately specify the frequency and duration of such services and supports. The brief should provide examples of both appropriate and inappropriate language and clearly indicate where in the IEP this information should appear.

[37] Hartford Public Schools, Monitoring Visit Report, Issued by Connecticut State Department of Education, Bureau of Special Education, September 2011, page 10.

Further, CSDE should affirmatively review IEPs for compliance with this policy as part of focused monitoring.

Paraprofessionals for Classroom Coverage

As with complaints that paraprofessionals are being assigned in ways that do not meet the requirements of individual student IEPs, complaints that paraprofessionals are being inappropriately assigned to manage whole classrooms of students may trigger rights to redress through either the labor grievance process or the CSDE's administrative complaint process. In addition, such complaints may reflect a failure of a school district to implement the educational interests of the state.

There are any number of laws and regulations that require, generally, that instruction only be provided by certified teachers. In addition, state law requires that substitute teachers possess at least a bachelor's degree, unless the district receives a waiver from the commissioner of education. According to a fact sheet on CSDE's website, the waiver may be granted to an individual who is:

- at least 18 years of age;
- a high school graduate; and
- has previous experience with school age children.

CSDE staff responsible for granting such individual waivers indicated that historically districts requested many more waivers, but since 2011, only about 100-150 a year are requested. However, the waivers are voluntarily sought by LEAs and there is no monitoring of districts' use of substitutes to ensure individual substitutes either meet the qualifications, or that waivers are in place.

Union representatives and paraprofessionals have offered somewhat conflicting statements about paras serving as substitutes. In the March 2014 hearing before the Education Committee, one union official testified:

> paraprofessionals work better as substitutes than substitute teachers. If a paraprofessional takes over a classroom it is often as an Educational Specialist that has first-hand experience with the children. Substitutes, on the other hand, do not see the children every day and are often dependent on the paras to provide the substitute with guidance concerning routine and teaching.

Yet, others voice concerns about paras routinely being asked to provide classroom coverage, either because it is pulling them away from equally important duties or because they know they are not qualified.

PRI staff's review of existing collective bargaining agreements showed that 26 districts offered additional stipends to paraprofessionals who provide substitute classroom coverage. Indeed, some districts may be using paraprofessionals and paying the stipend because they find it difficult to hire substitute teachers with bachelor's degrees for $75 a day, a typical per diem offered by many LEAs.

As a general rule, most of the individuals PRI staff interviewed would agree with the general observation that a paraprofessional with the minimal qualifications set forth in Title I should not be managing a classroom of students for more than brief periods of time in which the students were completing learning tasks related to instruction that had previously been provided by certified staff. If in fact a paraprofessional with such minimal qualifications was either providing direct instruction on a regular and/or on-going basis, there is the potential for a complaint to be made on behalf of the students and the state itself that the school district in question is not fulfilling its obligations to provide general education services. Although there are restrictions on who can file such complaints, the matters governed by the relevant statute – Conn. Gen. Stat. § 10-4a – are broad in scope. Paraprofessionals and their union representatives should keep this option in mind in addition to the other possible remedies outlined in this chapter.

The Program Review Committee believes that CSDE should be more proactive in its oversight of districts' use of paraprofessionals as substitute teachers, and the educational qualifications of paraprofessionals who are used in this capacity. **To do that, PRI recommends the State Department of Education should conduct a random audit of a sample of districts' rosters of substitute teachers and verify the individuals have a bachelor's degree, or that the district has a waiver for that individual. Secondly, CSDE should assess whether the number of substitutes on the roster appears adequate to meet the needs of the district, given the size, number of schools, and composition of the student body. If the roster appears inadequate, CSDE should further examine what those districts are doing to ensure adequate classroom coverage by qualified staff when teachers are absent.**

Assignments that Pose Risk of Physical Injury

Recently, the Paraprofessional Advisory Committee devoted a significant portion of one of their meetings to addressing the issue of paras being injured in the course of working with students. Such injuries may occur in one of two ways. One way is as a result of lifting or transferring a student with physical disabilities, the other is due to a student's aggressive or unsafe behavior. Unfortunately, as is the case with many of the other issues raised by paraprofessionals, there is no single agency or organization collecting data that would allow documentation of the extent to which paraprofessionals are injured in the course of performing their duties with students.

CSDE does not currently collect any data regarding injuries incurred by either certified or non-certified school staff, nor is it within CSDE's scope or authority to oversee workplace safety. The DOL does not collect any data beyond aggregate statistics on workplace injury and illnesses, and lost time from work, by industry code. The state Workers' Compensation Commission (WCC) administers workers' compensation claims in the state of Connecticut, but does not maintain data allowing quantification of the various types of employees filing claims or the nature of the claims that are filed. The Compensation Review Board (CRB), which hears contested workers compensation cases, does publish its decisions on the internet, but they are not searchable by type of employee, type of injury or keyword. They can only be searched by party name, year, or issue involved. PRI staff did attempt to obtain workers' compensation claims data from the Connecticut Interlocal Risk Management Agency (CIRMA), which insures more than 350 towns and school districts for their workers' compensation exposure and administers those

claims for the insured entities. However, CIRMA was unable to furnish data in response to staff's request.

The survey sent by PRI to school superintendents' offices sought data about paraprofessionals and workers' compensation claims, particularly those that might be related to injuries resulting from student behavior. Fifteen of the 22 districts indicated that at least one workers' compensation claim had been filed by paraprofessionals in the prior year. Those 22 districts employed a total of 1,066 paraprofessionals and reported a total of 107 workers compensation claims being filed, of which 81 (76%) involved injuries caused by "student behavior." In terms of individual districts, there were some that reported none of the workers' compensation claims were for injuries caused by student behavior while others reported that 100 percent of the paraprofessional workers' compensation claims were based on such injuries. This does not necessarily suggest that any district is misattributing the nature of the injuries triggering claims, instead it further illustrates that there are vast difference in how paraprofessionals are utilized and that some of the differences may also impact the degree of physical risk posed to those filling paraprofessional positions.

Although the low response rate to the survey precludes the drawing of any conclusions, the overall trend in which three-quarters of workers' compensation claims are based on injuries resulting from student behavior suggests that this is an area deserving of closer examination. However, PRI is reluctant to make a recommendation for several reasons. First, PRI believes that local school districts would be alerted by CIRMA (or other insurers) if the frequency and/or severity of workers' compensation claims is increasing, and be advised on what measures the districts might take to lower risk and increase safety. That is part of the scope of services offered by CIRMA.

Further, the School Paraprofessional Advisory Council is beginning to examine the issue, has put the topic on its future meeting agenda, and is soliciting input from its members and others on steps that might be taken to improve safety. PRI believes that the council will communicate its proposals to paraprofessionals and the districts through the CSDE website. Also, PRI found that the formation of a workplace safety committee is a provision in a number of collective bargaining agreements. PRI concludes that safe working conditions is an area that should be addressed at the bargaining table, rather than establishing safety mandates across all districts.

Restraint and seclusion. One possible context in which paraprofessionals or other school staff may receive injuries is in the process of restraining or secluding a student with special education needs. The regulations for use of restraint and seclusion of students were updated in 2010 and are contained in Appendix G. They are detailed and very specific about when and how such measures can be taken. One of the regulatory requirements is that:

> A person [student] at risk may be physically restrained or removed to seclusion only by a provider or assistant who has received training in physical management, physical restraint and seclusion procedures.

This is one of the only state-mandated training requirements that affect paraprofessionals. Certainly not all paraprofessionals are working with students who may need to be restrained or

secluded in emergency situations. Further, even if a para is supporting such a student, PRI staff has been told that the para may not be the person who actually implements restraint or seclusion procedures, as they may be expected to request support from trained personnel in the building such as resource officers.

However, while paraprofessionals may not be the school personnel who implement restraint or seclusion measures, PRI believes it is important that paraprofessionals supporting students who many require such measures be knowledgeable about the students' needs, ways to de-escalate situations, and the like. PRI makes recommendations in Chapter VI on professional development that help address this.

Chapter VI

Professional Development

Initial Qualifications

Background checks. There are minimal qualifications to be hired as a school paraprofessional. The only initial requirement is that any person, including teacher's aide, who is hired by a local or regional board of education must submit to a state and national criminal history record check within the first 30 days of the date of employment.

The process includes submitting fingerprints to the State Police Bureau of Identification and the F.B.I. for review. The results of those criminal history record checks are reported to the employing school district. If the district receives notice of a conviction of a crime by a person holding a certificate, authorization or permit issued by the State Board of Education, the district is required to notify the Bureau of Educator Standards and Certification.

At a September PRI meeting on this study, the committee requested that staff confirm that the background check included both state and federal criminal records and the processing time. PRI staff asked the Department of Emergency Services and Public Protection (DESPP) for this information, which is contained in the table below.

Table VI-1. Processing of Local Board of Education Criminal Background Checks at DESPP: January 1 through September 30, 2014

Type of School Involvement	Received	Processed	Pending
Employee (Teacher, Teacher Aide, Nurse)	16,960	13,028	3,982
Volunteer (Coach, Substitute)	862	685	177
Total	17,822	13,713	4,159

Source: DESPP

DESPP indicated that it took an average of 20.6 business days to process these checks, including the FBI examination. The background check revealed that 10.8 percent of the employee candidates had a criminal history, while 10.3 percent of volunteer candidates did.

In addition to the criminal background check, legislation passed in 2011 (P.A. 11-93) requires that as of July 2012 all applicants for positions with a local school district whether they require a certificate, permit or authorization, must also submit to a records check of the Department of Children and Families Child Abuse and Neglect registry before being hired. This provision clearly includes paraprofessionals. (The same requirements for applicants for certified positions went into effect a year earlier.)

Initial training. Once hired, the only state-required training of *all* paraprofessionals, along with all other school staff, is that they be trained in mandated reporting of child abuse and neglect. The training is either provided by the Department of Children and Families (DCF), or by another organization whose training program has been approved by DCF.

Public Act 11-93 also required DCF, in consultation with the state Department of Education, to develop a model mandated reporting policy for use by local and regional boards of education. The policy is to include applicable state law regarding mandated reporting and any relevant information, including time frames for reporting, that may assist school districts in the performance of mandated reporting. The policy is to be updated and revised as necessary. DCF is to establish initial training as well as a refresher training program. Each school employee who is considered a mandated reporter and hired after July 1, 2011 must participate in the initial training and in the refresher training at least every three years. School employees who are mandated reporters who were hired before that date are required to participate in the refresher course and then be trained in the refresher session at least every three years.

Further, while *not applicable to all school paraprofessionals*, state regulations require that special education students can be restrained or removed to seclusion only by a provider or assistant (which may mean a school paraprofessional) who has been trained in physical management, physical restraint, and seclusion procedures. Such training need not occur before starting work but must occur before the employee engages in any restraint or removal of a student to seclusion.

Educational Qualifications

As discussed earlier, Connecticut does not require certification of school paraprofessionals, nor are there state-imposed minimum education qualifications for persons hired as paras in Connecticut school districts. The federal statutes relating to both the No Child Left Behind (NCLB) law and the Individuals with Disabilities Education Act (IDEA) address qualifications to some extent, and those are summarized below.

No Child Left Behind (NCLB). Title I of the federal Elementary and Secondary Education Act of 1965, and reauthorized in 2002 by the NCLB act, was designed to improve academic achievement for all children, particularly those from low-income backgrounds. The act addressed concerns that instruction be delivered by highly qualified staff, and required that any districts or schools receiving federal Title I funds establish minimum requirements for instructional paraprofessionals. Those minimum qualifications that took effect in 2002 for all new hires, and for all paras by 2006 required:

- a high school diploma or equivalent; and
- additional education of at least 2 years of college credits; or
- a formal assessment of knowledge and skills.

While no data exists on educational profiles of Connecticut school paraprofessionals, it appears that most meet the NCLB qualification standards. The 2006 PRI study of paraprofessionals found that about half had at least two years of college, and half had a high school diploma. However, those findings were before the Title I effective date, so it is likely a higher percentage meet the standard now. In fact, 41 percent of paraprofessionals responding to a UConn UCEDD 2013 survey reported having a BA degree or higher and 42 percent stated they had an Associate's degree or some college. Only 16 percent indicated they had only a high school diploma or GED.

Many of Connecticut's school districts are required to meet the Title I standards because they receive Title I funding. In 2012-13, there were 575 Title I schools, in 112 districts. All of the state's larger school districts, where many of the instructional paras are employed, are Title I districts, and thus paras there must meet the standards.

In Connecticut, for those paraprofessionals lacking the requisite college credits, the assessment of a candidate's knowledge and skills is to score a passing grade the ParaPro Assessment. That test is developed and scored by the Educational Testing Service (ETS). Thirty-eight other states also use this assessment, although states (or sub-state jurisdictions) can set what a passing score is. In Connecticut, the State Board of Education has set the passing score at 457 of a possible 480. Table VI-2 below shows the variation in passing score requirements.

Table VI-2. States Using ParaPro Assessment and Passing Scores

Parapro Passing Test Score	Number of States	States
464	2	MA, ND
461	5	RI, SD, WA, WY, TX(461-467)
460	8	CO, ID, IL, IN, MI, MN, NV, UT
459	7	AZ, AR, DE, HI, ME, MD, PA
458	3	CA (458-460) MS, VT
457	2	CT, NM
456	6	GA, NE, NJ, OH, SC, TN,
455 or below	3	KS (455), LA (450) VA (455)

Source: Educational Testing Service

The Title I requirements apply to paras with responsibilities that include: one-on-one tutoring at times when a student is not receiving instruction from a teacher; assisting with classroom management; instructional assistance in a library or media center and the like. The requirements do not apply to those paras who have no instructional duties, such as lunchroom monitors, cafeteria workers or office paras. In addition to setting qualification standards, Title I is also clear that paraprofessionals providing instructional support to students must do so under the direct supervision of a highly qualified teacher.

PRI staff asked CSDE about the numbers of paraprofessionals who had taken the ParaPro assessment. Because CSDE does not schedule or administer the test, CSDE had to seek the information from the ETS. The information, which was provided in the aggregate, is shown in the Table VI-3. From the data, it is not possible to know how many times the test was given during that period or the number of persons who took it multiple times. Perhaps more importantly, it provides no indication of the number of persons who are working in Title I districts or schools, but have not yet taken and/or passed the test.

Table VI-3. Persons Passing ParaPro Assessment September 2009 - August 2014

	Number Passing	Percent Passing	Median Score	Min. Score	Max. Score
All test takers (n=101,837)	N/A	N/A	471	0	480
Connecticut test takers (n=2,037)	1,763	86.6%	471	420	480

Source: Educational Testing Service

Individuals with Disabilities Education Act (IDEA). As previously discussed, the vast majority of Connecticut's paraprofessionals are assigned to work with students requiring special education. Unlike Title I, federal laws and regulations governing IDEA are silent on the minimum qualifications necessary to work with special education students. Instead, the 1997 amendments to the IDEA require paraprofessionals to be trained in accordance with state law, regulation, or written policy.

Connecticut state laws and regulations pertaining to special education, (which use the term *aide* for paraprofessional) require that aides work under the direct supervision of a certified teacher or related service provider, such as a certified speech or occupational therapist, and specify that "such aide works in close and frequent proximity with the teacher or related service personnel." [38]

The same Connecticut regulations require that time be scheduled during the school day for personnel who provide special education and related services to consult with other school personnel and parents. Further, since much instruction of students with disabilities now occurs in the general education classroom, state special education regulations also require time for consultation with general education staff.

Connecticut's special education regulations also require each board of education to provide a system of personnel development to meet the requirements of IDEA, but no specified time is mandated. This in-service training on special education and related services is to be given to general and special education instructional, related service providers (such as speech and occupational therapists) and support personnel. The regulations state that:

- [local] board of education may require certain personnel to attend specific in-service training activities identified by the Department of Education to respond to specific corrective actions ordered by the Department of Education as a result of a complaint investigation, monitoring activities, or a due process hearing officer decision.

Thus, state statutes and regulations do not mandate professional development for all personnel (including paraprofessionals) involved in special education, but do allow local boards to mandate such training if it is the result of CSDE findings.

Other State Involvement in Professional Development of Paras.

State Education Resource Center. In 2006, PRI found in its prior study of school paraprofessionals that CSDE did not assess the overall professional needs of school paraeducators from a statewide perspective. In response to those findings, legislation passed in 2007 (P.A. 07-3) required CSDE, through the State Education Resource Center (SERC)[39], to promote and encourage professional development activities of paras with instructional responsibilities. Those activities outlined in statute include:

[38] (Regulations of Connecticut State Agencies §10-76d-2 (f) (a).
[39] The State Education Resource Center (SERC) is a quasi-public agency funded largely though federal funds passed through the State Department of Education. Its primary role is to provide technical assistance in the area of special education.

- providing local and regional school boards of education with training modules and curricula relevant to paraprofessionals;

- assisting boards of education in effective use of paraprofessionals; and

- developing strategies to improve communications between teachers and paraprofessionals in the provision of effective student instruction.

While no statewide mandate exists – either on the districts or on paraprofessionals – to participate in professional development, PRI finds that opportunities to engage in such development are ample. Obstacles to such training include finding time (away from regular duties) and/or arranging compensation (for training time). Below are some of the professional development and training sessions offered to school paraprofessionals.

SERC, with CSDE financial support, holds an annual paraprofessional conference, an all-day Saturday event, in November of each year. The conference offers opportunities for paraprofessionals to collaborate, network and recognize their collective accomplishments, as well as to enhance their knowledge and skill through seminars and workshops. This conference was not held in November 2014, as the national conference for paraprofessionals is being held in Hartford in April 2015, and much of the resources and planning that would have been focused on the state conference have been redirected to the national event. However, below are the numbers of paraprofessionals who attended the last three annual conferences:

16th annual conference (2011) – 255 Paras
17th annual conference (2012) – 200 Paras
18th annual conference (2013) – 165 Paras

As evidenced by the numbers, attendance at this statewide conference has dropped considerably from 2011 to 2013. Interviews with persons involved in organizing these events indicate a variety of contributing factors: paraprofessionals have attended the conference before; staff are unable or unwilling to attend a Saturday event; and a need or preference for training more narrowly focused on needs of students in their particular district or school.

Those factors appear to be borne out by numbers of paraprofessionals who have attended in-district trainings provided by SERC over the past three school years, which are included in Table VI-4. The numbers somewhat underrepresent participation, as SERC may have provided more than one session in a district and if so, that para was counted only once, even if that person attended more than one in-district session.

Table VI-4. Paraprofessional Participation in SERC-Provided-in-District Training

School Year	Number of Paras
2011-2012	79
2012-2013	52
2013-2014	282
Total	413

Source: State Education Resource Center

In-district sessions provided by SERC have included:

- challenging behaviors/de-escalation strategies;
- scientific research-based interventions (SRBI);
- literacy for students who can't sit still;
- instructional strategies for students with autism; and
- common core state standards.

SERC typically asks participants what additional professional development they might be interested in, and some of the in-district participant responses were:

- motivation and functional behavioral analysis;
- professional development that incorporates both professional and support staff . . . common goals, collaboration, and team approaches;
- ways of dealing with unwanted behavior; and
- how to apply behavior management strategies more directly with lessons

Thus, it appears from both the increasing numbers of participants in in-district training and the types of professional development suggested for future sessions, that SERC should make it a priority to develop training around the particular needs of the students that paraprofessionals support.

Capitol Region Education Council. The Capitol Region Education Council (CREC) offers the COMPASS program, a comprehensive, job-embedded development curriculum aligned with national and state paraeducator standards, with five basic and 16 advanced modules. Some session topics include: Roles and Responsibilities, Connecting Instruction to Common Core Standards, and School Climate: Creating Environments that are Safe for All. Districts can hire CREC to conduct the sessions or CREC can certify the district's own staff members.

The COMPASS training offered by CREC can be delivered in a variety of ways:

- **On-Site Workshops:** A certified CREC COMPASS trainer will come to your school or district and present any of the COMPASS modules;
- **CREC Workshops:** The COMPASS modules are presented regularly at CREC's central offices in Hartford, Connecticut;
- **Online Training:** Select COMPASS modules are available as an online course;
- **COMPASS Certification Program:** Build capacity within your organization to train paraeducators using the nationally recognized COMPASS curriculum. Certification includes initial training, training materials, ongoing support, and recertification; and
- **COMPASS Coaching and Mentoring:** paraeducators can receive coaching and mentoring on COMPASS competencies from CREC expert trainers. The COMPASS is aligned with the National Paraeducator Standards and can be customized to include specific district practices, procedures, and forms.

UConn's University Center for Excellence in Developmental Disabilities (UCEDD). As noted above IDEA does not give guidance to states in defining what constitutes "appropriately trained and supervised." To help address this, the national Council for Exceptional Children (CEC), in collaboration with the National Resource Center for Paraeducators, developed a set 10 professional development guidelines that reflect the knowledge and skills paraeducators working with students with disabilities should possess.

In Connecticut, the UConn University Center for Excellence in Developmental Disabilities (UCEDD), located at the UConn Health Center has created a survey to gauge training needs around the 10 core competencies which include knowledge of: development and characteristics of learners; individual learning differences; instructional planning; and instructional strategies.

The UCEDD survey was piloted in one school district to determine its paraprofessionals' training needs. The survey was then distributed to paraeducators through CSDE's district paraprofessional contact list. Some results of that survey were discussed in Chapter II. UConn UCEDD develops customized training for a district after assessing the individual district's needs and observing its practices.

School Paraprofessional Advisory Council. As outlined in the September update, legislation was passed in 2007 requiring the Commissioner of Education to establish a School Paraprofessional Advisory Council. Its primary role is to advise the commissioner quarterly on needs for training of paraprofessionals and the effectiveness of the content and delivery of existing training. The advisory council submits its recommendations in an annual report to the commissioner and to the legislature's Education Committee.

PRI staff reviewed the recommendations contained in the annual reports of the council from 2012, 2013, and 2014. They are summarized in Table VI-5.

Implementation of recommendations. While there has been no formal status report on the implementation of the council's recommendations, CSDE staff indicated that many of them had been fully or partially implemented. For example, a great deal of information related to a teacher's role in supervising and training paraprofessionals, such as the full set of CSDE guidelines, are now posted on the Teacher Education and Mentoring (TEAM) website – www.ctteam.org. Also, SERC, the Connecticut Association of Schools (CAS) and CSDE have collaborated to integrate supervision of paras into administrator training programs. CAS is also working on a brief for administrators on the Supervision and Evaluation of Paraeducators.

CSDE indicates it encourage districts to provide professional development to their paraeducators, through advertising training opportunities in the monthly district contact newsletters, postings on the CSDE website, dissemination of information at workshops and conferences, and providing financial support for paraprofessionals to attend the annual SERC conference (fee waivers for attendees from Priority School Districts) and for the development of CREC COMPASS Modules.

Table VI-5. Paraprofessionals Advisory Council Recommendations Regarding Professional Development		
Year	**Number**	**Recommendation summary**
2012	4	1) Field experiences for teacher candidates should include opportunity to observe effective collaborative practices between teachers and paras. 2) Collaboration with paraprofessionals should be integrated into the Teacher Educator and Mentoring program. 3) Training programs for school administrators should include coursework on how to supervise and evaluate paraprofessionals. 4) Districts should be encouraged to involve their paraprofessional workforce in regular professional development activities each school year.
2013	5	• CSDE should adopt the title "paraeducator" to emphasize that paraprofessionals help in improving student instruction and to reflect those professional development needs. • Teacher candidates should have opportunity to observe effective collaborative practices between teachers and paras (Rec #1 from 2012). • Encourage districts to provide training to teachers on their role in guiding and coaching paras. • CSDE should develop a bank of best practices in supervising and evaluating paraprofessionals. • Encourage districts to involve their paraprofessional workforce in regular professional development activities each school year (Rec 4 from 2012).
2014	2	1) Educator Advisory Committee should include (in its professional development materials) specific references to teachers' knowledge and skill in guiding and coaching staff who work in their classroom. 2) CSDE should collaborate with different organizations, districts, and unions to create a statewide database of paraeducator contacts that can be used to email information to district paras.
• Source: PRI Staff Review of Advisory Council's Annual Reports		

CSDE has continued to inform districts of professional development resources regarding paraprofessionals (Guidelines, supervisory checklist, etc.) by: postings on CSDE and TEAM websites; through its monthly district contact newsletters, and at professional development workshops and conferences. CSDE is also currently revising the segment of the agency website devoted to paraprofessionals to make it more accessible and easier to navigate to relevant,

current information about professional development opportunities and resources. PRI believes this revision is much-needed, as committee staff found the current site very difficult to utilize in that specific information was not always easy to locate. CSDE indicates it has adopted the term paraeducator, however PRI notes that the CSDE website still uses the title of paraprofessional in its Guidelines, its data collection is for "non-certified instructional staff," and the most recently adopted regulations refer to "aides."

Professional Development at the Local Level

Beyond the mandated reporter training requirements, and ongoing training for staff implementing restraint and seclusion, there are no state requirements that paraprofessionals receive any professional development, either by type or number of hours. Nevertheless, the majority of districts' collective bargaining agreements with paraprofessionals contain provisions related to professional development. Of the 154 contracts reviewed, 93 (60 percent) contained some provision, while 61 (40 percent) did not. Of course, just because a contract does not contain a provision on professional development does not mean that training does not occur in the district. A summary of these training provisions is contained in Table VI-6.

Table VI-6. Professional Development Provisions in Paraprofessionals Contracts (n=154)

Provision	Number of Districts
No provision included	61
Voluntary Paid, if approved by Board/District – no set amount – no description of type 1 district requires board to ensure adequate training but no mandates or description of type	29
Yes, paid when required (mandatory) no set amount	12
In-service examples: may attend teacher in-service with approval; 4 half-days; 5 (2 hr.) sessions; 5 hours with 3 at beginning of school year; no set amount; no set amount superintendent to set after consultation w/union; may attend in-service (but no pay)	12
Required -1 day	10
Voluntary 1 day	8
Workshops/conference with approval	6
No professional development but tuition reimbursement	4
Mandatory 2 days-3 days	4
Committee to develop	3
Required – not to exceed 1 day (1 district also provides 30 minutes a week prep time)	2
Voluntary – 2 days with approval	2
Orientation	1
Source: PRI staff analysis of district collective bargaining agreements	

Best practice: professional development committee. PRI staff noted that a small number of district contracts called for creating a labor-management committee around training and professional development. PRI staff discussed this with staff from one of these districts, Enfield, to further explore how this professional development strategy was working. In Enfield, the committee is made up of one person from central office administration appointed by the

district and three paraprofessionals – one each from the elementary, middle, and high school levels – chosen by the union.

The district held its first two sessions this fall: one in September; the other at the end of October. Both professional development sessions were held during school hours, on early release days for the district, and paraprofessionals were paid to attend. The September session was given at elementary, middle, and high school levels by certified, in-district occupational therapists working at each level. The sessions were attended by 87 paras – 82 full-time and 5 part-time – and focused on the specific needs of the students with whom the paras were working, including sensory and adaptive equipment, strategies for redirection, and how to provide assistance with fine motor skills.

The second session focused on establishing built-in time for teachers and paras and related service staff, like counselors and speech therapists, to collaborate, especially around IEPs and supports for students. This included instruction on: how caseloads should be reviewed; collecting and reporting data on IEP objectives; setting and prioritizing goals; and the cooperation and team work needed to achieve best outcomes. Enfield administration explained that the new common core standards and teacher evaluation criteria include a component on collaboration with other staff. Thus, the need to create this collaborative environment is growing in importance for a number of reasons. The second Enfield session was attended by 97 paras -- 91 full-time, three part-time, and three substitutes. The Director of Special Education in the district indicated that, while evaluations from the sessions could not be shared, the responses were overwhelmingly positive.

Thus, PRI concludes that a best practice around professional enhancement is to tailor training and skill development to the needs of the paraprofessionals in individual districts. A labor-management committee that is developed through the collective bargaining process is certainly one way to advance that, but not necessarily the only way. UConn UCEDD, SERC or CREC may also help districts with this. One of the advantages to professional development provided by district-trained and certified staff is that they already know the needs of the students they, and the paras, support. In addition, when training is done for all staff for particular grade levels, rather than just teachers, or special education teachers, the session time is also providing an opportunity for consultation and collaboration.

While PRI believes that ongoing professional development ideally would occur as a best practice, there obviously will be some districts that employ paras that will not view it as such. PRI does not believe a statewide mandate for *ongoing* professional development is appropriate, and therefore, does not recommend such. *On the other hand, PRI finds it is unreasonable to require paraprofessionals to start work in a classroom, or with one or more students, especially those with disabilities, without adequate information about the needs of the students and effective strategies to support them. PRI staff noted many district job postings for vacancies are general and vague and are not helpful in outlining duties or expectations.*

To ensure at least some preparation for the requirements of paraprofessional positions, PRI recommends that districts shall be required to provide a minimum of three hours of training, with pay, for all instructional paraprofessionals prior to the start of the school year. That time should be spent with the supervisor of the paraprofessional, who

will provide such information as needed to apprise the paraprofessional of the role and responsibilities he or she will be expected to perform.

If paraprofessionals are hired after the start of the school year, or, if there are reassignments during the school year, the districts shall provide the same number of hours of training prior to performing new duties in a classroom and/or with an individual student or students.

Information conveyed to paraprofessionals. The information that a paraprofessional needs to adequately perform job duties is inherently individualized, given the variation in school districts, classes, and students. If a paraprofessional supports a child with a disability, it is crucial that the paraprofessional understand what is expected of her in terms of implementing the child's individual education program (IEP). PRI staff heard complaints from paraprofessionals that they were not given access to the IEP, with districts claiming they were prevented from doing so under the federal Family Education Rights and Privacy Act (FERPA).

CSDE has issued a brief regarding paraprofessionals viewing student IEPs and attending planning and placement team meetings at which IEPs are developed or discussed. (The brief is included in Appendix I). The issuance of the brief was intended to clarify the "myth" surrounding confidentiality of certain student information and accurately inform public school districts of their responsibilities under FERPA. A student's IEP can be legally accessed by the paraprofessional but she must sign in on the access form indicating why the staff person is accessing the information. Further, CSDE brief explains that any information contained in the IEP must not be shared with persons outside the educational team. One way of ensuring that a paraprofessional knows the student's needs and objectives is through viewing the IEP. Another way is for the paraprofessional to be shown only the parts of the IEP, or a summary of the IEP, that pertain to the supports and activities for which the para will be responsible.

PRI believes it should be left to individual districts and their administrative and certified staff to determine how paraprofessionals will be informed and trained for their duties prior to assuming them. However**, PRI recommends that the State Department of Education redouble its efforts to inform districts about paraprofessionals and access to IEPs. This could be done through reissuing the brief and distributing it to all district Directors of Special Education, the Connecticut Association of Boards of Education, Connecticut Association of Public School Administrators, Connecticut Association of Schools, Connecticut Council of Administrators of Special Education, parent advocacy groups and other organizations with an interest in special education.**

Supervision and Evaluation

The CSDE guidelines are helpful in that they encourage districts to focus on the legal requirements that a paraprofessional must work under the direct supervision of, and in close proximity to, a certified staff person. The guidelines also provide practical advice on how certified staff, who may never have been trained in supervising other staff, can best oversee the day-to-day activities of paraprofessionals. Part of that supervisory role will be put into play before the school year begins, with the mandatory professional development recommendation made above. Other measures suggested in the guidelines set a priority on building time into the

school day so the supervisor, whether the special education or general education teacher, can consult and collaborate with paraprofessionals.

In addition, the CSDE guidelines also provide a model based on six core competencies for teachers and other certified staff in supervising paraprofessionals. The six standards developed by the National Resource Center for Paraeducators provide a framework of knowledge and skills that certified staff should possess in order to effectively oversee the work of paraprofessionals.[40]

Research and best practice clearly state that day-to-day supervision and program implementation – including planning, assigning duties and checking with paraprofessional as to whether they clearly understand their responsibilities – are the role of the certified staff. Administrative responsibilities like hiring and firing are not within the scope of a teacher's role.

Similarly, evaluations of paraprofessionals should not be done by teachers. The CSDE guidelines caution that evaluations should only be completed by an administrator who has the necessary credentials to evaluate personnel. This is critical as evaluations are often the basis for continued employment, going from temporary to permanent status, or decisions to fire and/or rehire. The CSDE guidelines indicate that evaluations should be conducted at least once a year.

PRI staff heard in interviews with teachers that while they believe that certified staff should be consulted by administrators when evaluating paraprofessionals, they also trust that their input will not be directly attributed back to the teacher. Teachers stated that it is important that paraprofessionals and teachers work collaboratively, and that trust and mutual respect is an essential foundation for that.

Evaluations and the evaluation process can be stressful and current and projected standards for evaluating teachers are also controversial. Paraprofessionals are not certified and do not have similar job protections offered to teachers, like tenure. Therefore, changes requiring strict evaluation criteria that tie teacher evaluations to student performance do not apply to paras. Still evaluations of paras are important, and the standards and components that are included in the evaluation should be carefully considered, as much as who does them.

Best practices for evaluations. Evaluations and examples of evaluation instruments have been discussed at previous meetings of the School Paraprofessional Advisory Council. PRI staff was told by council members that the Madison school district had done a great deal of work on developing a meaningful evaluation process. PRI staff spoke with human resources personnel in Madison who described the district's process used and provided copies of the evaluations developed. Perhaps it is important to note here that just as Enfield had consulted with staff in the development of its professional development program, so too did Madison in developing it evaluation tool. The process started by convening a meeting of two building administrators, one special education administrator, and two union representatives (a secretary and para).

[40] National Center for Paraeducators Model, Standards for Teacher/Provider Supervisory Competencies (1999). Contained in 2012 CSDE Guidelines, pages 48-53.

In the meeting, this team decided that it wanted to see evaluations that are:

(1) user friendly for both the evaluator and the staff person being evaluated;
(2) tailored to the functions of the job; and
(3) that contribute to a richer conversation between evaluator and staff member.

The evaluation contained three sections. The first is section is "professional characteristics" and is universal on all job evaluations while the second section in tailored to work responsibilities depending on which sub group the para employee fits in: (1) secretary; (2) tech para; (3) general education para (at elementary level); or (4) special education para. The content of the "work responsibilities/student interaction" section was determined in consultation with the bargaining unit members in that job class in a group "goal setting meeting," which was required by the collective bargaining agreement. The last section is where a narrative can be written, both by the employee being evaluated and by the evaluator.

Another example of best practice around evaluations is occurring in Rhode Island, where during the 2013-14 school year, the state certification office within the Rhode Island Department of Education piloted a new model.[41] The new process evaluates certified support personnel based, at least in part, on student learning outcomes (SLO) or student outcome objectives (SOO). Part of this model is to collaborate with other educators and paraeducators to set specific targets for increasing access to student learning. An example of student outcome might be reducing truancy or chronic absenteeism.

The Rhode Island system, like the one in Madison was developed after convening a small group of representatives of each profession and conducting focus groups around the state to design the system. What was learned was that all need to work together to establish both types of outcomes. The Rhode Island system, which went into full effect for the 2014-15 school year, requires school districts to evaluate support professionals in three areas:

- professional practice, which includes collaboration with colleagues and the quality of services delivered;
- professional responsibilities, which includes fulfilling school responsibilities, communications, and professionalism; and
- student learning.

PRI does not recommend any particular evaluation model, only notes that there are best practices available for districts to use. The most promising models are those that incorporate collaboration in both the determination of what should be evaluated and how it relates to outcomes, and in the development of a specific evaluation process and tools.

[41] Rhode Island: Measuring Contributions Support Professionals Make to Learning (https://www.ed.gov/edblogs/progress/2014/07) accessed 7/30/2014.

Chapter VII

Recognizing and Valuing Paraprofessionals

PRI heard repeatedly throughout the course of the study that paraprofessionals must be viewed as an integral part of the school and district in which they work. Earlier chapters of this report have outlined that, for the most part, the monetary component of paraprofessional compensation is low. Further, in interviews with union staff and paraprofessional bargaining unit members, PRI staff was told that economic considerations, like pay and health insurance, are a higher priority in contract negotiations than softer issues, such as professional development and recognition. However, in the aftermath of the recession, with local school budgets fairly flat, as shown in Chapter II, it is probably unrealistic to think paraprofessionals will achieve any great economic gains in the near term.

The poor economic outlook makes other ways of recognizing the value of paraprofessionals in schools and districts all the more important. Once the decision has been made to hire a paraprofessional in a district, and the district has invested in training, if an individual performs her duties well it only makes sense that the district would want to retain that individual. Establishing a culture in the district that values paraprofessionals, both individually and as a member of an important group of school personnel, is essential.

The CSDE Guidelines for Paraprofessionals set a tone for that. The introduction contains this quote: "in the final analysis, schools cannot adequately function without paraeducators, and paraeducators cannot adequately function in schools that lack an infrastructure that supports and respects them as viable and contributing members of instructional teams."[42] This chapter contains best practices around how paraprofessionals can be viewed as valued staff necessary to support educational instruction of children in Connecticut.

The School Paraprofessional Advisory Council

In 2007, legislation was passed creating the School Paraprofessional Advisory Council. As described in Chapter VI, the council holds quarterly meetings and advises the commissioner of education or the commissioner's designee on professional development needs at least quarterly. Initially, the council's statutorily designated membership consisted only of representatives of statewide bargaining units (i.e., unions) representing instructional paraprofessionals. In 2013, legislation expanded the council membership. While no set number of members was put into statute, the council now also includes:

- two representatives from exclusive bargaining units for certified employees;
- the most recent recipient of the Connecticut Paraprofessional of the Year Award (see below);
- two representatives of the regional educational service centers appointed by the commissioner of education; and

[42] Daniels and McBride 2001

- a school administrator appointed by the Federation of School Administrators.

PRI found that the Advisory Council meets quarterly as required by statute, but identified several areas where the council's functioning could be improved. First, the statute is silent on staff support for the council. While CSDE informally provides staff support it is not required to do so. When the council was first created in 2007, and when the Guidelines for paraprofessionals were being developed, the CSDE had provided one staff person, full time, to support paraprofessional activities. This is no longer the case. With state fiscal constraints and reduction in state agency personnel, it is unlikely that CSDE can again designate a staff person whose sole responsibility is support of paraprofessionals. Nevertheless, PRI believes there should be some assurances that CSDE will not reduce staff support to the council, and to paraprofessionals statewide. **Therefore, PRI recommends that CSDE be mandated to provide staff support for the council and its work.**

PRI staff also noted that the School Paraprofessional Advisory Council meeting dates are not posted in advance on the website CSDE maintains for the council, and while minutes are posted meeting agendas are not. PRI believes that as a statutorily created body, the meetings and agenda items of the council should be as visible as possible to interested members of the public. **Thus, CSDE support staff should ensure that all School Paraprofessional Advisory Council meetings and agendas be posted at least 48 hours in advance of the meeting.**

The statutorily designated membership of the council is primarily union representatives for bargaining units including paraprofessionals. Although the 2013 legislation made that somewhat more balanced by adding additional members, PRI believes that because of the high number of union representative on the council, it may be perceived as primarily a labor union organization. **Therefore, PRI recommends that the council be expanded, to include two paraprofessionals who do not belong to a union, as well as a special education teacher involved in supervising a paraprofessional, a representative of one of the higher education institutions offering teacher preparatory programs, and a parent who has a child who is currently receiving, or in the past has received, paraprofessional support.** By including representatives with other perspectives, the council may develop a broader range of strategies directed toward professional development of paraprofessionals.

Further, the statute is silent on whether these should be a chairperson for the council or how one should be designated. Consequently, there is really no chairperson of the council, and there is some confusion about whether the CSDE staff support person is the chair. PRI believes that any council, committee, or the like, whether advisory or not, needs a chairperson to function well. **Therefore, PRI recommends the council elect a chairperson from among its members, and the term of the chair should be for two years.**

PRI also noted that some of the council meetings are held at union offices. PRI believes this again may lead to a perception that the council represents just the voice of organized labor. As a statutorily created body, the council should be meeting at a public location. **Therefore, PRI recommends that the CSDE staff support function include securing a public meeting place for the council, as well as advance posting of the meeting locations on the CSDE website for paraprofessionals.**

Finally, the CSDE has informally maintained a "paraprofessional contact list" of one person in each district who is supposed be the conduit of information from CSDE, the School Paraprofessional Advisory Council, and other state entities to districts and district staff. However, PRI staff heard from several people over the course of the study that the contact list is often out of date or that the contact person does not disseminate information to paras locally. The advisory council made a recommendation in 2014 that CSDE should collaborate with different organizations, districts, and unions to create a statewide database of paraeducator contacts that can be used to email information to district paras. **PRI recommends that CSDE establish such a list, with current contact persons in each district who will be responsible for disseminating information to paraprofessionals in that district. The contact list should be reviewed annually by the Advisory Council and updated by CSDE.**

Paraeducator of the Year Award

In 2012, the State Department of Education and the School Paraprofessional Advisory Council jointly established a paraprofessional of the year award. In 2013, the award was officially named in memory of Anne-Marie Murphy, the paraeducator who was killed in the Sandy Hook School mass shooting. CSDE invites local school districts to submit a single nomination of a school paraprofessional who has demonstrated exceptional skill and dedication in the performance of his or her job, thereby earning the respect and admiration of students, teachers, administrators, coworkers, and parents.

Only administrators, such as district superintendents or school principals, may submit a nominee for the award. Each district nominee is evaluated based on six criteria. These criteria are based on a model articulated by the National Resource Center for Paraeducators, which Connecticut selected and modified as its framework for articulating key competencies for Connecticut paraeducators. The model defines these six primary areas of responsibilities for paraeducators:

1. Assisting teachers/providers with building and maintaining effective instructional teams;
2. Assisting teachers/providers with maintaining learner-centered supportive environments;
3. Supporting teachers/providers with planning and organizing learning experiences;
4. Assisting teachers/providers with engaging students in learning and assisting in instruction;
5. Assisting teachers/providers with assessing learner needs, progress and achievement; and
6. Meeting standards of professional and ethical conduct.

CSDE encourages district applicants to submit additional materials that demonstrate their nominee's commitment to improving student achievement, such as evidence of participation in professional development.

In the three years the award process has been implemented, the number of districts submitting nominations has increased from to 22 in 2012, to 25 in 2013, to 32 in 2014. In order

to elevate the significance of the award and publically recognize its recipient, the award is presented at a dinner event attended by many paraprofessionals and others involved in education.

Governor's Proclamation

Early in 2014, Governor Malloy issued an official proclamation, recognizing the thousands of paraprofessional that work in Connecticut schools. The proclamation cited the important role that paraprofessionals play in ensuring student educational success, and designated April 2, 2014 as Paraprofessional Appreciation Day.

CSDE's Guidelines for Training & Support of Paraprofessionals

The CSDE's Guidelines are an invaluable tool for recognizing and describing what paraprofessionals do, and in assisting districts in ensuring paras can support effective educational practices. The latest edition of Guidelines, which was issued in 2012, revised and updated previous versions, building on information that had been developed by CSDE beginning in 1989. The 2012 document covers many aspects of paraprofessional utilization including: federal laws and regulations; hiring and orientation; and model planning tools for paraprofessionals and teachers to use jointly. The full Guidelines is available on the State Department of Education website at: http://www.sde.ct.gov/sde/lib/sde/pdf/cali/guidelines_paraprofessionals.pdf.

PRI finds that while the Guidelines document contains essential information for districts, paraprofessionals, and others, it is quite dense, containing over 100 pages and many appendices. Finding specific topical information or a specific tool can be overwhelming. Few districts reported regular use of any individual part of the Guidelines, although most districts reported using other tools and resources available through the CSDE. Tools and information contained in the Guidelines, such as the assessment tool for examining the impact of paraprofessionals, might be more widely used if they could be readily accessed as stand-alone briefs. **PRI recommends that individual briefs be developed around topic areas in the Guidelines, and posted on CSDE's website for paraprofessionals.**

Two other initiatives are underway that involve paraprofessionals and indicate how valuable they can be in addressing two very different but equally important aspects of education Improving School Climate and the CT K-3 Literacy Initiative.

Improving School Climate

Statutorily, CSDE is required, within available appropriations, to:

- document schools' articulated needs for technical assistance and training related to safe learning and bullying;
- collect information on prevention and intervention strategies being used to reduce bullying and improve school climate and improve reporting outcomes;
- develop a recommended model safe school climate plan for grades K-12; and
- in collaboration with the Connecticut Association of Schools, disseminate to all public schools grade-level appropriate school climate assessment instruments approved by the department.

During the 2012-13 school year, every public, magnet and charter school was required to conduct school climate assessments for student, faculty, and parents. As of November 2013, 88 percent of the schools had submitted their data. As with most aspects of education, the way districts and schools address school climate varies. In fact, the assessment found that there were more than 50 distinct programs to foster positive school climate used in Connecticut schools. Many schools reported they are implementing two or more approaches in combination.

As part of their climate assessment, school districts are asked to survey employees on whether they have received some form of training in positive school climate. The responses, which were aggregated statewide and reported (by percent of staff, not numbers) by CSDE, showed that less than half of paraprofessionals stated they had such training, compared to 83.3 percent of teachers and almost 90 percent of administrators.

PRI interviewed CSDE staff responsible for providing technical assistance to schools and districts around safe school climate. They described some of the important principles that must be practiced in order to effectuate a positive school climate. Perhaps the major one is that a school community creates an environment where all members are welcomed, supported, and feel safe in school. They reinforced this by saying that staff should treat all other staff – regardless of differences in certification, credentials, or degrees – with respect and consideration. How staff members treat each other sets a tone for how the students will treat each other. The CSDE staff also noted that a best practice in providing technical assistance to improve school climate is that all staff in a school, including paraprofessionals, be involved.

CT K-3 Literacy Initiative

This effort, begun in 2012, established an early reading grant program targeted at priority school districts. The initiative committed $1.7 million to the project, which was begun in five schools and is based on best practices in early literacy success. PRI staff spoke with researchers from UConn's Neag School of Education, which is leading the project initiative. The first phase involves bringing a literacy coach and four reading interventionists into each school to: help adapt existing effective programs; develop new instruction methods; tailor lessons to individual student needs; and gather data to both document student progress and to ensure the program is being implemented with fidelity.

The program intends to add five schools to the program each year, and has the overall objective of building capacity for schools and districts to carry on the literacy initiative independently. Schools participating in the initiative commit to providing students with uninterrupted reading instruction and access to evidence-based small group intervention strategies, and to creating literacy teams that meet regularly to examine students' progress and plan and adjust instruction accordingly.

The Neag staff indicated that paraprofessionals are being trained and used in this initiative, as one of the strategies is to have as many people as possible engaged in reading with the students as much as possible. Research shows that if students don't read well by the end of third grade they are likely to continue to struggle. Thus, as the researchers stated, there is a compelling need for an "all hands on deck" approach during this critical period.

Training paraprofessionals to implement this type of program fits well with the findings of existing research discussed in Chapter IV – when appropriately trained and supported to deliver research-based interventions – paraprofessionals are effective at improving student performance, particularly in literacy programs in the early elementary years.

Appendices

Appendix A

CSDE Instructions to Districts for Counting Non-Certified Instructional Staff

NON-CERTIFIED STAFF FILE (ED162)
INSTRUCTIONS

1. Report all non-certified staff as of October 1, 2013. This includes regular non-certified staff employed by your district as well as **contracted** food service and transportation staff (e.g., employees of Laidlaw, Dattco, Marriott, etc.) who provide services to your district. See below specifically how to report these FTEs.
2. **Print these instructions and the data page for each school, and distribute them to your principals. The data displayed in the left-hand column of the page are 2012-13 data. Enter 2013-14 data in the right-hand column.**
3. Full-time equivalent (FTE) for a full-time position is 1.0. Part-time positions should be reported as a percentage of 1.0 (e.g., 0.4, 0.6, etc.)
4. Direct any questions to Alison Zhou at (860) 713-6893 (e-mail: alison.zhou@ct.gov). The data are due **November 30, 2013.**

NON-CERTIFIED INSTRUCTIONAL STAFF

Category	Description	Subgroup
Instructional Assistant	Report all staff members (paraprofessionals) assigned to assist a teacher in activities such as monitoring, conducting rote exercises, operating equipment and clerking. **Do not report kindergarten or regular program reading instructional assistants here.** NOTE: "Other Program" includes staff in areas such as Title I.	Pre-Kindergarten Kindergarten Regular Program ESL/Bilingual Other Program
	Special education paraprofessionals must be reported in two categories in order to comply with the Individuals with Disabilities Act (IDEA).	
	Report an FTE for all paraprofessionals teaching students ages 3, 4, or 5. **Please note these are the students' ages, NOT the grade in which they are placed.**	Special Education: Students Ages 3-5
	Report an FTE for all paraprofessionals teaching students ages 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, or 21. **Please note these are the students' ages, NOT the grade in which they are placed.**	Special Education: Students Ages 6-21
Reading Instructional Assistant	Report all paraprofessionals providing reading instruction to students. Do not report staff members performing only administrative functions here.	None
Library/Media Support Staff	Report all staff members who assist a library/media specialist in performing professional library/media services.	None

NON-CERTIFIED NON-INSTRUCTIONAL STAFF

Category	Description	Subgroup
Technical Staff	Report all staff members who provide computer network administration, database administration, and computer support services.	None
Other Student Support Services	Report all staff members who provide services not provided by regular or special education instruction (e.g., attendance officers; aides providing health, psychology, speech or social services, etc.) NOTE: all schools are required by law to have a nurse on staff at least part-time.	School Nurse Other Support Services
Professional Administrative	Report all professional, non-certified staff members who assist the superintendent in directing and managing the operation of the district (e.g., human resource assistant, purchasing manager, fiscal services personnel, program evaluators, etc.)	None
Auxiliary Administrative Support Staff	Report all district-based clerical staff members who provide direct support to administrators (e.g., secretaries, administrative assistants, data entry operators, data entry clerks, etc.)	None
Other Service/ Support Staff	Report all non-certified staff members not reported elsewhere here. Report your transportation manager as well as **contracted** transportation staff (e.g., employees of Laidlaw, Dattco, etc.) who provide services to your district in central office form ONLY. Report a food service FTE, including contracted staff (e.g., Marriott) for each school.	Maintenance Custodial Food Service Transportation Security Other

Appendix B

Activities of the SBLR and SBMA Related to Paraprofessionals

Complaints to Board of Labor Relations Concerning Paraprofessionals January-September 2014		
District	**Issue**	**Status**
Falls Village	Transfer of para from one school to another/ impact of change	Received at SBLR September 2014 – no additional information.
New Haven	Para used for classroom coverage in lieu of substitutes	Agreement to limit coverage to 30 consecutive days.
Meriden	Two classes of paras – regular and special needs; regular para asked to diaper	No information.
Branford	Failure to accommodate para's disability (asthma)	Limit outdoor duties depending on weather. No exposure to chemicals or certain foods. Pay for time on administrative leave. Settled and closed.
North Canaan	Refusal to bargain – creation of new position – sub-contract out	Withdrawn and closed.
Vernon	Veteran's Day was a paid holiday, school calendar changed so paras work that day	Substituted Christmas Eve as paid holiday.
Branford	Prohibited practice – district sent letters to paras saying they would be responsible for health insurance for summer unless they signed an "intent to return"	Complaint pending. Remedy requested is cease and desist and bargain over changes in premiums. No additional information.
Reg.17	Failure to bargain in good faith – BOE did not offer vacation period for insurance payments as with other bargaining units	Resolved in negotiations –complaint withdrawn.
Salisbury	Prohibited practice – BOE created two part-time teaching assistants and filled them with part-time teachers	BOE agreed to higher rate of pay. The two positions will not exceed 14.5 hours per week. There will be no loss of other para positions. The two part-time employees will be members of the CBA. Signed agreement.
Killingly	Bad faith bargaining -- two cases	Both withdrawn and closed
Source: State Board of Labor Relations		

State Board of Mediation and Arbitration – Contracts Involving Paraprofessionals -- FY 2012-FY 2016 –	
Fiscal Year	**Activity**
2012	6 contracts were in binding arbitration – 3 settled in mediation, 1 settled in binding arbitration and 1 case is still in process
2013	4 contracts were in binding arbitration - 3 contracts settled in binding arbitration and 1 settled in mediation
2014	5 contracts were in binding arbitration – 3 settled in mediation and 2 were in negotiation with waivers of timeframes
2015	23 contracts scheduled for binding arbitration
2016	17 contracts scheduled for binding arbitration
Source: State Board of Mediation and Arbitration	

Appendix C

District References Groups (DRGs)[1]

Each of Connecticut's 166 local or regional school districts and three endowed academies is assigned by SDE to one of nine District Reference Groups (DRGs), which are identified by the letters A through I. DRG classifications attempt to group districts by various community socio-economic characteristics, such as: median family income, percent of families living below the federal poverty level, percent of parents with a bachelor's degree, and percent of single parent families. Districts were last reassigned to DRGs in 2006.[2] Table C-1 lists the districts of which each DRG is comprised, and Figure C-1 is a map prepared by the Connecticut Association of Boards of Education (CABE) which shows the DRG assignment of each local school district.

Table C-1. Connecticut District Reference Groups

DRG A	Darien Easton New Canaan	Redding Ridgefield Weston	Westport Wilton Region 9
DRG B	Avon Brookfield Cheshire Fairfield Farmington Glastonbury Granby	Greenwich Guilford Madison Monroe New Fairfield Newtown Orange	Simsbury South Windsor Trumbull West Hartford Woodbridge Region 5 Region 15

[1] The CSDE has begun to use two different classification systems for its own analyses. One focuses on schools rather than districts and assigns schools to different categories such as Turnaround, Review, Transitioning and Excelling. This was the classification system used in the most recent "The Condition of Education in Connecticut" report, for 2012-13 (http://www.sde.ct.gov/sde/lib/sde/pdf/evalresearch/condition_of_education_2012-13.pdf). Within this system, a single district may have schools in two or more categories. Thus, it was not a useful system to use for district level analyses.

The other classification system remains focused on districts, but uses only 3 categories for all local and regional schools districts. The ten lowest performing district are referred to as "Alliance: Educational Reform Districts;" the next twenty lowest performing districts are referred to as "Alliance: Non-Education Reform Districts" and then there is a residual category for "All Other LEAs." Unsurprisingly, all of the districts in DRG I, in addition to three districts in DRG H comprise the "Alliance: Educational Reform Districts. The "Alliance: Non-Education Reform Districts" category includes the remaining six districts from DRG H as well as eleven districts from DRG G and one each from DRGs D and F. Because PRI was interested in a more nuanced portrait of paraprofessional utilization across districts, the DRG system provided for groupings that better account for differences in individual communities than does the Alliance District classification scheme in which 136 districts are combined into a single category.

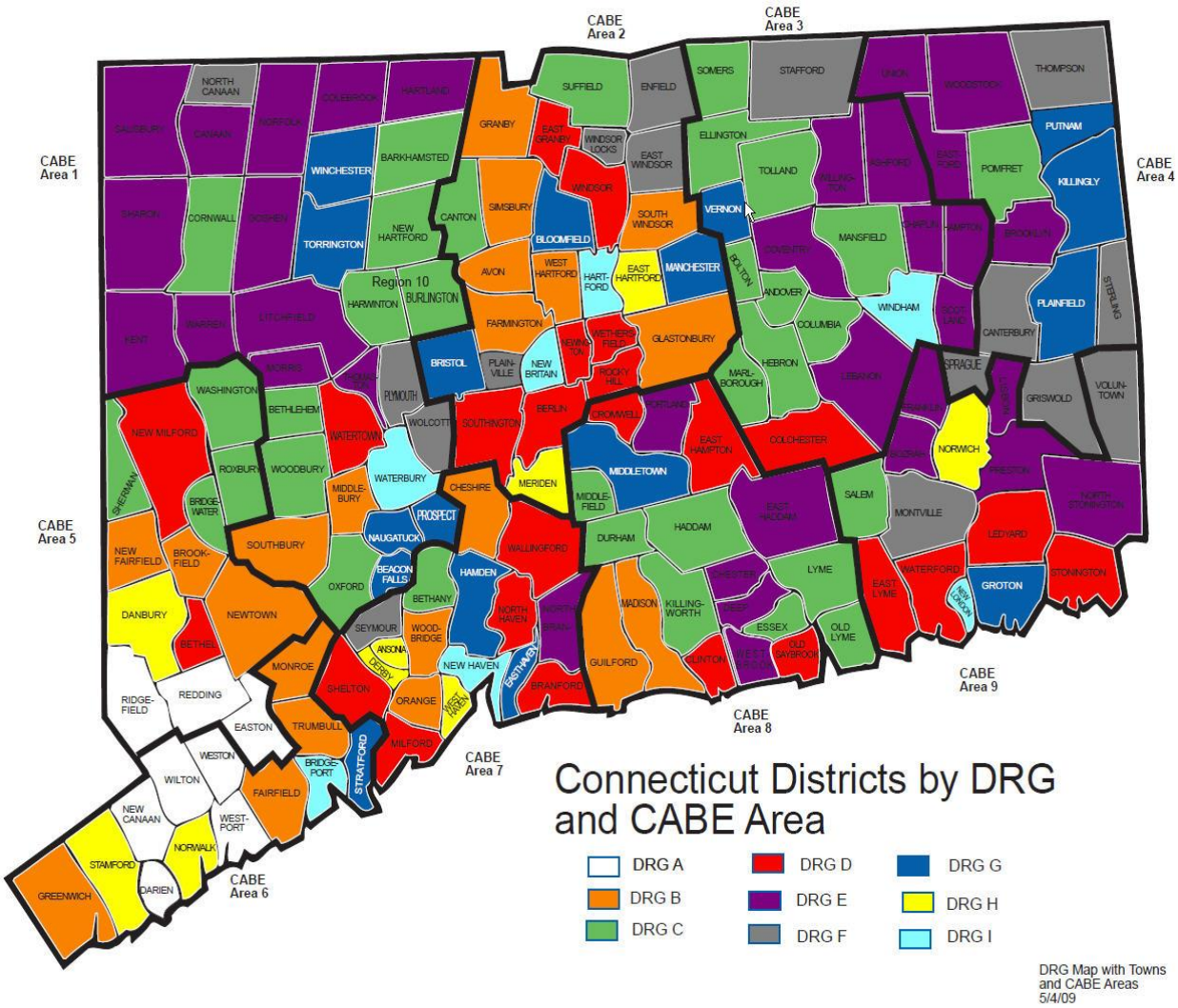
[2] More information about the methods used to establish Connecticut's DRGs can be found in a June 2006 CSDE Research Bulletin, available on line at: http://www.sde.ct.gov/sde/lib/sde/PDF/EvalResearch/DRG_2006.pdf.

DRG C	Andover Barkhamsted Bethany Bolton Canton Columbia Cornwall Ellington Essex Hebron	Mansfield Marlborough New Hartford Oxford Pomfret Salem Sherman Somers Suffield Tolland	Region 4 Region 7 Region 8 Region 10 Region 12 Region 13 Region 14 Region 17 Region 18 Region 19
DRG D	Berlin Bethel Branford Clinton Colchester Cromwell East Granby East Hampton	East Lyme Ledyard Milford Newington New Milford North Haven Old Saybrook Rocky Hill	Shelton Southington Stonington Wallingford Waterford Watertown Wethersfield Windsor
DRG E	Ashford Bozrah Brooklyn Canaan Chaplin Chester Colebrook Coventry Deep River Eastford East Haddam Franklin	Hampton Hartland Kent Lebanon Lisbon Litchfield Norfolk North Branford North Stonington Portland Preston Salisbury	Scotland Sharon Thomaston Union Westbrook Willington Woodstock Region 1 Region 6 Region 16 Woodstock Academy
DRG F	Canterbury East Windsor Enfield Griswold Montville North Canaan	Plainville Plymouth Seymour Sprague Stafford Sterling	Thompson Voluntown Windsor Locks Wolcott Region 11
DRG G	Bloomfield Bristol East Haven Groton Hamden Killingly	Manchester Middletown Naugatuck Plainfield Putnam Stratford	Torrington Vernon Winchester Gilbert School Norwich Free Academy

DRG H	Ansonia Danbury Norwalk	East Meriden Hartford Derby	Norwich Stamford West Haven
DRG I	Bridgeport Hartford New Britain	New Haven New London	Waterbury Windham

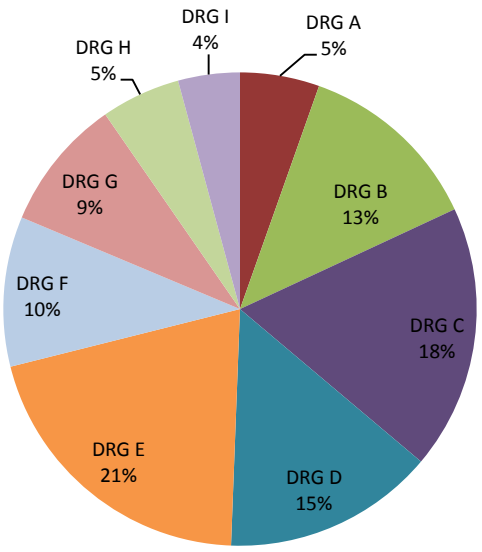
The SDE Research Bulletin explaining how DRG's were established describes how the groups run from the "very affluent, low-need suburban districts of DRG A to the seven high-need low [socio-economic status] urban districts of group I." As Figure C-1 illustrates, DRG A includes Darien, Weston, and Region 9, which serves students from Easton and Redding. DRG I includes both large cities, like Hartford and Bridgeport, and smaller cities, such as Windham and New London.

Figure C-1. Connecticut Districts by (Source: Conn. Assoc. of Board of Education)



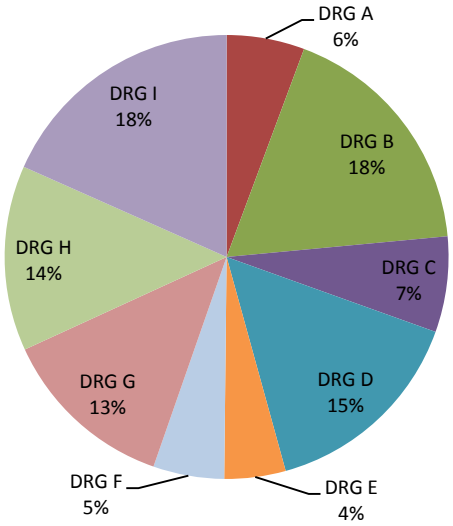
The DRGs vary in size, both in terms of the number of districts in the DRG and in the number of students who attend schools in those districts. For example, DRG A includes 9 districts and DRG I 7, but only 6 percent of all Connecticut students reside in DRG A as compared to 18 percent residing in DRG I. The 3 largest DRGs by number of districts – DRGs C, D and E – collectively include over one-half of all school districts but only about 30 percent of all students reside in those districts. Below, Figure C-2 shows the percentage of all districts in each DRG, while Figure C-3 shows the percentage of all students in each DRG. These figures are provided to provide context for understanding the challenges of making comparisons of paraprofessional utilization or student outcomes not only across districts but also across DRGs.

Figure C-2. Percent of Districts in Each DRG (2013-14) (n=166 districts)



Source: PRI staff analysis of CSDE data

Figure C-3 Percent of Public School Students by DRG (2013-14)
(n=524,744 students)



Source: PRI staff analysis of CSDE data

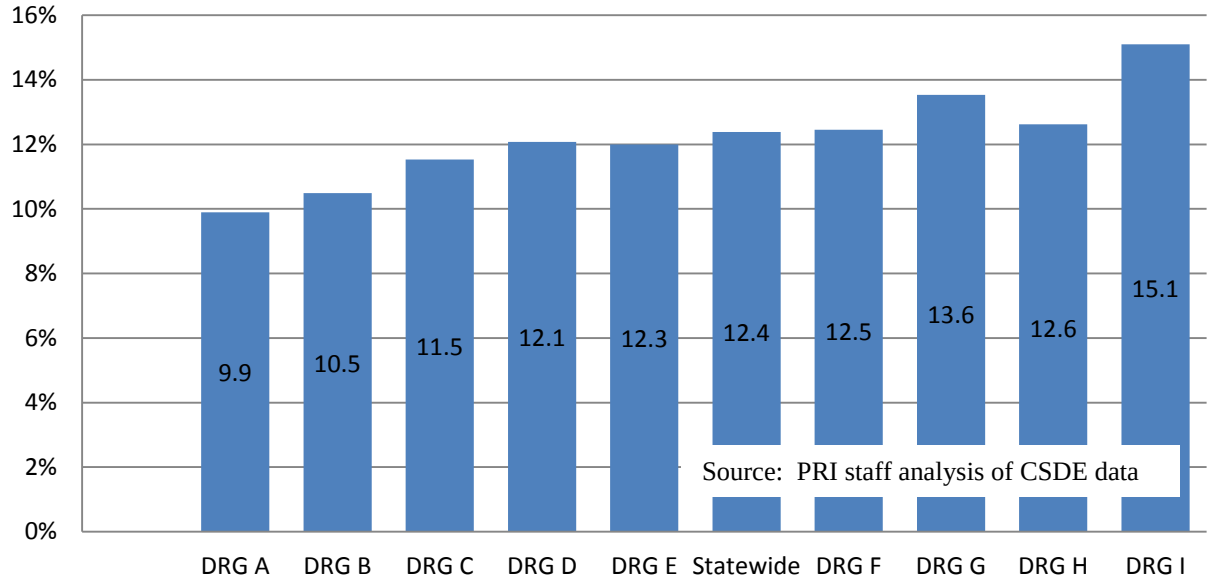
DRG Variation in Factors of Relevance to Utilization

Paraprofessionals are understood to play an important role in ensuring that students with disabilities are able to participate in general education classrooms.[3] Thus PRI staff conducted analyses of the variation among DRG in both the special education identification rate, and in the degree to which identified students with disabilities spend significant amounts of the school day with their non-disabled peers.

[3] More information about the correlation between use of paraprofessionals and inclusion of students with disabilities in general education settings is contained in Appendix F.

Identification. Beginning with the simple question of how many students with disabilities are being served in Connecticut's districts, Figure C-4 shows the average special education identification rate statewide and for each DRG. The special education identification rate reflects the average percentage of all students, grades K through 12, in each DRG that are identified to receive services pursuant to the IDEA (students who have IEPs). Reliance solely upon the statewide identification rate of is 12.4 percent, masks the reality that the average identification rate for DRGs ranges from as low as 9.9 percent in DRG A to as high as 15.1 percent in DRG I.

Figure C-4. Percentage of K-12 Students with Disabilites by DRG (2013-14)



Within each DRG there may also be considerable district variation in the overall student with disabilities identification rate. Every DRG, with the exception of DRGs A and B, includes at least one district with an identification rate of over 15 percent. In fact, the highest identification rates across the state can be found in individual districts within DRGs E (22 percent), F (19.7 percent) and G (19.1 percent), even though two of these DRGs have an average identification rate near the statewide average. The districts with the lowest identification rates can be found in DRGs B, (8 percent), C (6.8 percent) and D (7.9 percent).[4] The variation within as well as across DRGs must be kept in mind when considering the ways in which paraprofessionals are and are not used in different districts.

Inclusion. Appendix F explains the use of the metric TWNDP, or "time with non-disabled peers," as a measure of how successful a district is at the goal of educating students with disabilities in the general education environment whenever possible.

[4] This omits one of the endowed academies, which has an identification rate of 5.5 percent. The endowed academies, like magnet and charter schools and the CTHSS system, may restrict admission based on inability to serve students with certain needs. When this occurs, the student's home district, which would have paid the student's tuition to the endowed academy, is responsible for finding some other placement for the student. The other two endowed academies have identification rates of 12 percent and 14.9 percent.

CSDE provided data about identification and inclusion rates at various grade levels and in individual districts. Both rates vary noticeably by grade level. At the K-4 level, the identification rate is lower than the statewide average, at only 10.2 percent, while the identification rates for students in all higher grades is above the statewide average. The identification rate for students in grades 5-8 is 13.7 percent; the identification rate at the 9-12 grade level is 13.9 percent.

Likewise, although the statewide inclusion rate for all K-12 students in 70 percent, the inclusion rate at the K-4 level is higher and at the 9-12 level is lower. Table C-2 shows the overall special education identification and 80-100% TWNDP inclusion rate for each of these grade levels.

Table C-2. Identification Rates and 80-100% TWNDP by Grade Level* (2013-14)

Grade Level	Enrollment	Percent identified to receive special education services	Percent of special education student in general education setting 80-100% of the time
K-4th	196,606	10.2	76.5
5th-8th	163,966	13.7	70.9
9th-12th	169,991	13.9	59.4

* All figures are based on the total enrollment in those districts that educate any children at the identified grade levels but omitting those districts that either identify such a small number of students or include such a small number of students in each reported category that data was suppressed by the CSDE. Also omits students enrolled in Unified School Districts operated by DCF, DMHAS and DOC and in the Connecticut Technical High School System.

Source: PRI staff analysis of CSDE data

These statewide inclusion rates, even when disaggregated by grade levels, still mask significant variation at the district level. Table C-3 illustrates how, even within districts that have been categorized similarly, there is wide variation in inclusion rates at each grade level.

While the increase in special education identification rates at higher grade levels may be predictable, given that disability is typically understood to be a lifelong condition and that as people age they are more likely to be identified, the decreased rates of inclusion are not. The lower inclusion rates at higher grade levels are consistent with less use of paraprofessionals at these levels. The data suggests, as do interviews conducted by PRI staff, that inclusion becomes harder in later grades. This is reported to be due to several different factors including: more challenging academic work load, specialization of teachers in separate classrooms, and greater degrees of difficulty that can be experienced in managing behavioral challenges associated with student disabilities as students get older. It is possible that greater use of paraprofessionals at higher grades could improve inclusion rates, but there is no strong evidence to this effect.

Table C-3. Variation in Inclusion Rates Across DRGs and Grade Levels											
		State-wide	DRG A	DRG B	DRG C	DRG D	DRG E	DRG F	DRG G	DRG H	DRG I
K-4th	Mean	**77.9**	79.7	80.7	79.3	79.8	78.6	86.8	74.9	73.0	73.5
	Minimum*	**45.8**	56.8	60.0	49.4	50.5	53.8	47.1	59.7	54.4	45.8
	Maximum	**100.0**	96.6	92.0	93.8	95.8	100.0	90.5	90.9	85.1	87.6
5th-8th	Mean	**73.7**	73.5	76.2	75.4	75.5	77.4	68.7	71.3	67.6	63.7
	Minimum	**26.7**	51.2	61.9	53.3	53.4	26.7	50.0	59.4	43.0	42.6
	Maximum	**100.0**	87.5	93.3	93.3	92.2	100.0	92.3	81.5	75.4	78.6
9th-12th	Mean	**62.5**	66.5	67.4	64.7	66.6	68.0	57.9	50.9	56.7	53.3
	Minimum*	**29.1**	53.0	45.8	40.0	46.5	32.0	45.6	34.6	44.3	29.1
	Maximum	**92.9**	72.9	83.9	83.7	92.9	91.5	72.1	67.3	69.9	74.4

*At both the 4th-8th and 9th-12th grade levels, the district in DRG E with the lowest inclusion rate is a district that does not operate its own middle or high school and which sends students to an endowed academy. If the academy determines it is unable to serve a student, the district must find an alternate placement.

Source: PRI staff analysis of CSDE data

Literature on the topic of inclusion suggests that there are a wide variety of reasons why an individual district may have a high or low inclusion rate. The primary reasons cited for having a high inclusion rate usually include school or district leadership having a strong commitment to inclusive education. Other reasons cited include, on the one hand, having the resources to serve a variety of student needs, but, on the other hand, being in a geographical area with limited options for appropriate alternative placements. In the latter situation schools may have to creatively leverage available resources to maintain a general education placement for a student with truly unique needs. Reasons for having a low inclusion may include either the availability of, and/or parental pressure to place students in, alternative settings that provide specialized services to individuals with a particular disability.

In light of the numerous factors that can influence identification rates and inclusion rates it is not surprising that there have been few, if any, studies that directly link the use of paraprofessionals to higher rates of inclusion. In fact, although beyond the scope of this study, there are indications that specialized schools, whether operated by local districts or approved private special education schools, may employ more paraprofessionals than general education schools and may use paraprofessionals more effectively, albeit not to support the goal of inclusion.

Appendix D

SDE Sample Paraprofessional Job Description

Sample Job Description

The job description is useful in clarifying the roles of the paraprofessional and can serve as a reference point in conducting an evaluation of paraprofessional's performance. The job description should specifically delineate the paraprofessional's duties in writing and may change from time to time, depending on the needs of students and staff. Often included are the duties that paraprofessionals are to perform and the duties that paraprofessionals are not to perform, as dictated by school district policy, ethical and legal constraints, and school protocol. Administrative concerns, such as working conditions, supervision and evaluation procedures, may also appear in a written job description. Job descriptions will vary depending on the needs of staff and students and the duties expected to be performed by a paraprofessional.

Job Description for Paraprofessional, Lincoln Public Schools

Position / Title: Paraprofessional Department: Variable Assignment: General instruction Assignment Length: 180 days Essential Functions:

Note: This is a generalized job description. Specific duties and responsibilities vary, depending on the assigned department or school. Applicants should be made aware of the specific functions of the position before employment.

Frequent:

- Performs office duties such as attendance reports, typing, filing and handling routine interruptions such as notes, messages and deliveries.
- Performs routine supervisory duties such as lunchroom, playground, halls and classroom.
- Types, draws, writes and duplicates instructional materials.
- Researches and assembles materials to be used in a particular unit (per instructions from the respective teacher).
- Prepares bulletin boards, graphs and charts.
- Reserves films. Checks papers, workbooks, homework and tests; (if object answers have been supplied by the teachers).
- Helps in the care of the classroom. Writes plans on chalkboard, overhead projector.
- Reads to students, listens to students read.
- Helps students with make-up work.
- Assists in individual or group activities, games, flash cards, etc.
- Assists students in interpreting and following directions of the teachers.
- Drills to reinforce any skill the teacher has taught.
- Alerts teacher to needs of students.
- Assists teacher in checking progress of individualized study projects.

Occasional:

- Fills out attendance cards and cumulative records.
- Checks emergency sheets, class lists, etc.
- Collects moneys for books, lab fees, etc.
- Assists with inventory of supplies and equipment.
- Assists with field trips. Contacts community resource people. Makes educational games and aids. Assists when emergencies arise. Performs any other delegated noninstructional responsibility assigned by teacher or administrator.

Requirements:

1. High school diploma or equivalent; good work attendance record.
2. Ability to follow teacher direction and written plans.
3. Ability to maintain student confidentiality.
4. Appropriate communication skills. 5. Ability to work in a team setting. 4. Ability to work with and meet individual needs of children as directed by teachers and other professional staff.
5. Ability to work or learn to work various office machines.
6. For paraprofessionals hired in Title I positions, see requirements on page 7.

Reports to (Evaluator): Building administrator
Receives Guidance from (Supervisor): Teacher, building administrator
Full-Time/Part-Time: Full-time, part-time
D.O.T. No.: 249.367.074 Elementary
099.327.010 Secondary

Physical Requirements:
Standing — frequent
Walking — frequent
Sitting — occasional
Bending/stooping — occasional
Reaching/pulling — occasional
Climbing — never
Driving — occasional
Lifting 40 pounds maximum* — occasional
Carrying 25 feet — occasional
Manual dexterity tasks — frequent
*Specify: *a/v equipment, TV/VCR, recorders, telephone, typewriter/word processor, and copier.*

Other Requirements:
Effective oral and written communication skills and skills in human relations, leadership and conflict management.

Working Conditions:
1. Inside and outside. 1. Climatic environment: Most district classrooms and other work areas are not air-conditioned and are subject to extremes of temperature and humidity.
2. Hazards: stairs, dust, drafts, communicable diseases and others, depending on assignment.

***Range of Possible Duties:**
Job duties may vary depending on assignment. Individuals may be reassigned, as necessary.
Job duties may include:
1. Self-care activities.
2. Behavior management
3. Supervision of children outdoors and on transportation.
4. Lifting of individuals.
* Modified by Task Force

Appendix E

Data on Districts and Student Counts

Some of the percentages and ratios contained in this report differ from those included in the September Staff Update. The reason for this is that as additional data became available from SDE, it became apparent that there were better ways of comparing patterns of paraprofessional utilization in Connecticut's local and regional school districts than by relying on statewide data. Some of the differences between the statewide ratios reported at the Update and the ratios for the 166 local and regional LEAs are included in Table E-1.

Table E-1. Comparison of Statewide Ratios with 166 Local and Regional District Ratios (2012-2013)

	Statewide Ratio	Ratio across 166 LEAs
All Students per Special Education Teacher (Special Educator Density)	94:1	97:1
Special Education Students per Special Education Teacher	10:1	13:1
Special Education Students per Special Education NCIS	6:1	9:1
Special Education Paraprofessionals per Special Education Teacher	1.6:1	1.9:1

Source: PRI staff analysis of CSDE data

The primary reason for these differences, and any differences in reported percentages, are that the analysis have shifted from including all of Connecticut's 197 public school districts at the update to including only the 166 local and regionally operated districts for this report. Secondarily, there are times at which different counts of students are used in computing ratios and percentages. This appendix explains the different kinds of schools included in Connecticut's system of public education and different ways of counting students in relation to these different types of public schools.

Connecticut's Public School Districts

The 166 districts that are the focus of this study are the 149 districts run by municipal boards of education and the 17 districts run by regions consisting of two or more towns. Connecticut's public school districts also include:

- 17 charter schools districts in which a school chartered by the state or a local board of education is run by a public or private non-profit corporation;

- 6 Regional Education Service Center (RESC) districts that operate both general education magnet schools and special education schools;

- 3 Unified School Districts operated by the Departments of Corrections, Children and Families, and Mental Health and Addiction Services for students who are served by those agencies' residential programs;

- 3 quasi-public academies that are independently endowed and operated but serve as the primary high school for one or more towns paying tuition on behalf of each student sent; and

- the Connecticut Technical High School System, which operates 16 high schools.

In the aggregate, this is a total of 197 "public school districts" and these 197 districts operate 1,135 schools.[5] Because of differences in how these districts are organized, what kind of schools they operate, and what kind of students they serve, direct comparisons that include all 197 districts are not always possible or desirable.

A few of Connecticut's 166 local and regional districts operate only one school. Sprague, for example, operates a single K-8 school and has a relationship with other districts, such as the Norwich Free Academy district, for purposes of providing its students with a high school education. Some towns have their own district to provide elementary education and participate in a regional district for high school education; this is the case in Winchester, which participates in Region 7 for high school. Other regional districts, like Region 4, which encompasses the towns of Essex, Chester and Deep River, operate individual elementary schools in separate towns and a single consolidated middle school and high school. Some single municipality districts have dozens of schools, particularly the urban districts like Hartford, Bridgeport and Waterbury.

While smaller districts might be unable to provide on-site special education for all students with all disabilities, many of the larger districts operate regular education schools at all grade levels as well as schools serving exclusively or primarily students with special education needs. The Manchester School District, for example, operates a general education high school at which 12.5 percent of the over 1600 students in 2013-14 received special education services and Manchester Regional Academy, at which 76 percent of the 92 students received special education services. The decision by a district to offer a variety of in-district special education programming options has implications for its numbers of enrolled special education students and for staffing levels, including paraprofessional staffing levels.

Counting District Staff

There are reasons some school districts will predictably have higher or lower counts of certain kinds of staff. For example, because all 6 RESCs operate one or more special education schools, the RESCs are all likely to employ more special education teachers and more special education NCIS on a per student basis than are other kinds of districts. In contrast, because charter schools, and RESC operated general education magnet schools may be smaller than other

[5] Numbers of schools and districts are reported for the 2012-13 school year.

public schools, these schools may have less ability to provide accommodations, services and supports to students with disabilities, enroll fewer students with disabilities, and thus have less need for special education instructional staff or for paraprofessionals in general. Districts operating schools like the technical high schools and other content themed schools may also have fewer students with disabilities and smaller class sizes and thus less need for special education instructional staff and paraprofessionals generally.

As noted, some of Connecticut's 166 local and regional school districts may also operate special education schools, or self-contained special education programs within a general education school. In order to staff such schools or programs, districts may employ special education teachers and special education paraprofessionals to work exclusively in those programs. Thus, in relying on district-wide counts of staff, particularly special education staff, there is some loss of granularity as it cannot be known to what extent staff are working in the general education environment or in an exclusively special education environment.

Counting District Students

In order to compute any instructional staffing ratios involving students, it is also necessary to determine what count of students should be utilized. SDE provided PRI staff with several different data sets to use in its analyses. When using these different data sets, it can appear that the number of students in a district or even across all 166 local and regional districts has changed.

Some public schools, like charter schools, endowed academies and the RESC schools, serve students from one or more municipal or regional districts. The students attending those schools are included in some counts for the sending LEA and in other counts for the district operating the school which he or she actual attends. Students who are attending a CTHSS or a school operated by one of the Unified School Districts (for DCF, DOC and DMHAS) are counted only for those districts for all purposes. A few examples are provided here to illustrate these distinctions.

- Two students reside in Norwich. Student A attends the Norwich Free Academy, an endowed academy; Student B attends a RESC Special Education Center operated by EASTCONN. Both students are counted as Norwich LEA students for purposes of special education prevalence and related data sets. Student A is counted as a Norwich Free Academy student for purposes of enrollment, indicators of educational need, chronic absenteeism and four-year graduation rate data sets. Student B is counted as an EASTCONN student for the enrollment, indicators of educational need and chronic absenteeism data sets, but as a Norwich School District student for the four-year graduation rate data set.

- Two students reside in Hartford. Student C attends a Jumoke Academy charter school; Student D attends The Museum Academy (operated by CREC). Both students are counted as Hartford students for special education prevalence. Student C is counted as a Jumoke Academy student for enrollment, indicators of educational need, chronic absenteeism, and use of restraint and seclusion. Student D is counted as a CREC student for each of these data sets.

- Student E lives in Waterbury and attends Kaynor Technical High School (operated by the CTHSS). That student is counted as a CTHSS student in all SDE data sets. She is not included in any counts of Waterbury students.

- Student F is a student with multiple disabilities who lives in Meriden. She does not attend the same school her siblings go to, but she attends another public school in Meriden that has a classroom specifically for students with significant disabilities where she receives all instruction and services. Student F is counted as a Meriden student for all data sets.

As the above examples illustrate, the total number of students in a school district will vary, depending on what data set is being used. Generally speaking, the number of students enrolled is the best way to compute student to staff ratios, but it is not necessarily the best way to understand a district's rates of special education identification or inclusion of students with disabilities. Thus, at different times, analyses in this report reflect different counts of students.

Because most analyses relating to paraprofessional utilization rely on counts of all students enrolled, without regard to whether the students are included in the general education environment or primarily in separate schools or self-contained classroom, it should be noted that this may reflect underestimates of the student to staff ratios. In other words, if a district has assigned several special education teachers and special education paraprofessionals to such environments, there are actually fewer staff available to all students than if those teachers and paraprofessionals were working with students with disabilities in the general education environment.

Appendix F

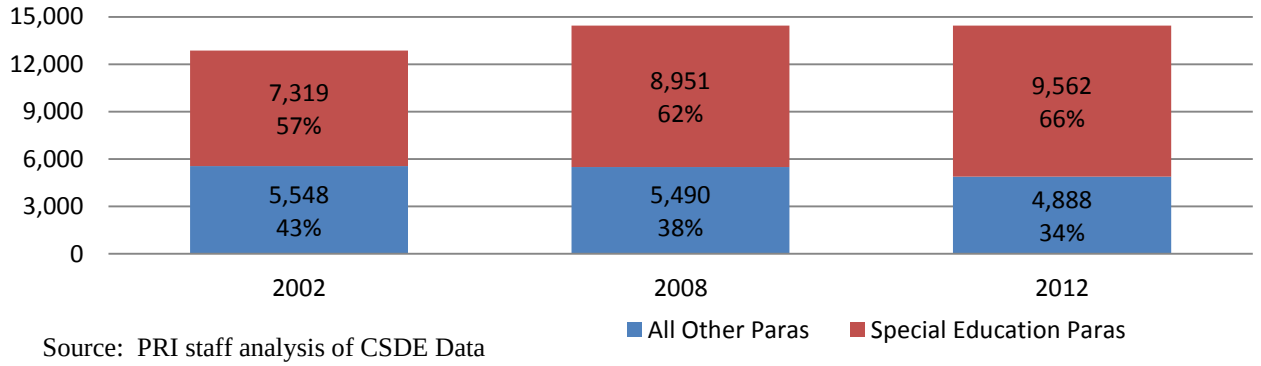
Increased Utilization in Special Education and Inclusion

Although this study is directed toward all instructional paraprofessionals working with students in Connecticut's public elementary and secondary schools, it became apparent, very early on, that the use of paraprofessionals in special education would require special treatment attention. This is because, as shown in Figure F-1:

- Almost two-thirds of all non-certified instructional staff are assigned to assist with the delivery of special education; and

- the number of special education paraprofessionals increased 30 percent between 2002 and 2012 while the number of all other types of paraprofessionals increased negligibly or decreased.

Figure F-1. Number and Percent of Special Education and All Other Instructional Paraprofessionals (CT, 2002, 2008, 2012)



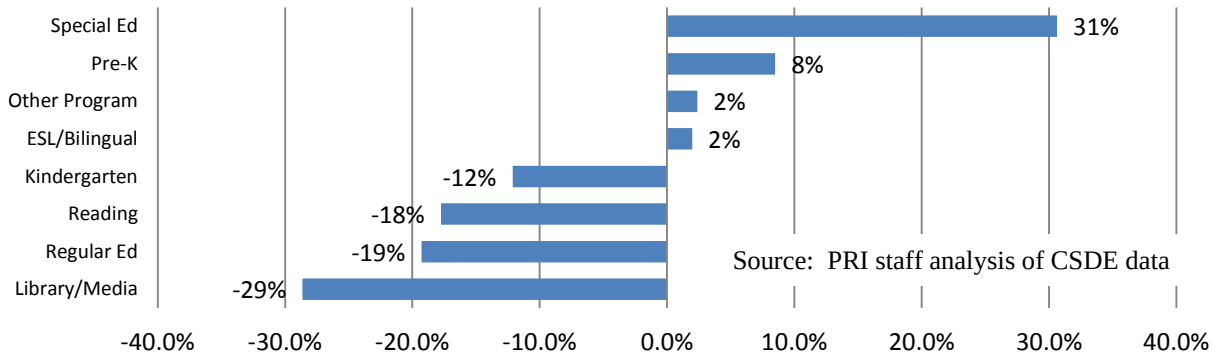
Source: PRI staff analysis of CSDE Data

Decreasing Paraprofessionals in General Education

Figure F-2, on the next page, illustrates the percentage increase or decrease in the number of FTE paraprofessionals reported in each of the eight SDE reporting categories. Because the overall numbers of paraprofessionals in most categories other than special education is relatively small, the percent decreases do not reflect large numbers of lost positions. Although there has been a net loss of NCIS who are assigned to work with all students, this is a loss of 660 positions over ten years, representing a decrease of about 12 percent.

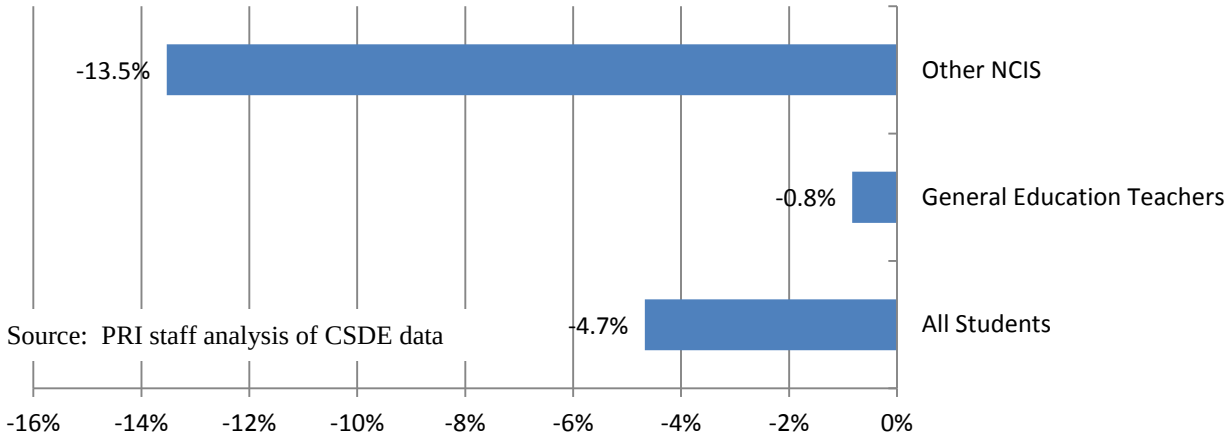
Figure F-3 shows how this net loss, measured from 2004 to 2012, compares with the decreasing number of students and general education teachers over the same period. These numbers are provided in response to a concern that the increasing numbers and percentage of special education paraprofessionals may reflect a decrease in paraprofessional support for the student population both with and without disabilities.

Figure F-2. Change 2002-03 to 2012-13



As shown in Figure F-3, however, the almost 5 percent decrease in number of all students enrolled, and the relatively unchanged number of general education teachers serves to temper the impact of decreasing numbers of non-special education NCIS. One way to understand the impact of the decrease in non-special education paraprofessionals is by reference to the ratios of

Figure F-3. Percent Change Non-Special Education Instructional Staffing (CT, 2004-2012)



all students to general education teachers, to non-special education paraprofessional, and to all general education instructional staff (general education teachers and non-special education NCIS combined)[6]. As shown in Table F-1, while the ratio of all students per non-special education NCIS increased from between 2004 and 2012, the ratio of all students to general education teachers decreased enough so that the ratio of all students to all general education instructional staff decreased from 14:1 to 13:1.

[6] In many schools and districts there are also instructional specialists who, very broadly speaking, are certified staff acting as content area specialists for general education teachers. As a group, instructional specialists includes some certified teachers who provide direct instruction and some who do not, so it is not possible to include the group as a whole in the count of instructional staff statewide. It should simply be noted that this a conservative estimate of the total number of general education instructional staff.

Table F-1. Ratios of all students to general education instructional staff, 2004 and 2012		
	2004	**2012**
Students to non-special education NCIS	102:1	113:1
Students to general education teachers	16:1	15:1
Student to non-special education instructional staff	14:1	13:1
Source: PRI staff analysis of CSDE data		

Even if the impact of reduced numbers of general education paraprofessionals on student-to-instructional staff ratios is considered minimal in relation to statewide ratios, each individual district has its own experience and resource shifts, and changes at DRG and individual district levels may in fact be cause for concern.

Inclusion as a Factor in Increasing Special Education Paras

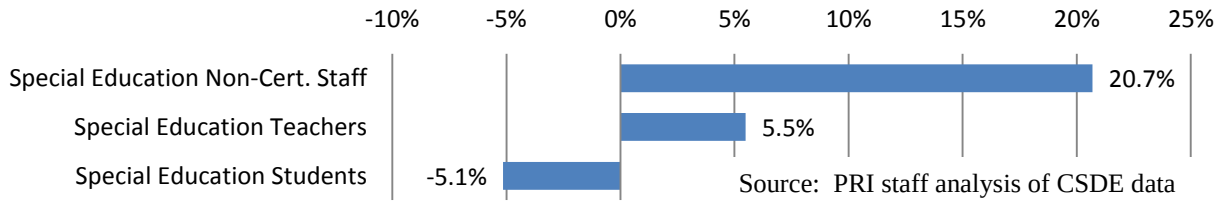
Most districts employ both special education paraprofessionals and general education paraprofessionals. However, the tendency is for most of each district's paraprofessionals to be assigned to special education. Table F-2 shows the percent of all paraprofessionals that are special education paraprofessionals for each of Connecticut's nine district reference groups (DRGs) and statewide.

Table F-2. Average Percent of All Paras Assigned to Special Education by DRG (2012)	
DRG	**Mean percent of all paras assigned to special education**
A	64%
B	67%
C	70%
D	69%
E	64%
F	67%
G	70%
H	67%
I	63%
Statewide	67%
Source: PRI staff analysis of CSDE data	

Results from an analysis of SDE enrollment and staffing data as related to the increase in special education paraprofessionals, are illustrated in Figure F-4. Two significant observations are that:

- the increasing number of special education paraprofessionals was not in response to an increasing number of students being identified for receipt of special education;
- the increasing number of special education paraprofessional was not accompanied by a similar increase in the number of special education teachers.

Figure F-4. Percent Change Special Education Instructional Staffing (CT, 2004-2012)



Source: PRI staff analysis of CSDE data

The factors that are most often reported as contributing to the increased number of special education paraprofessionals were described in the September 2014 Staff Update and can be summarized as follows:

- Changes in federal laws governing education
- Changing profile of students with disabilities
- Economic factors
- Provision of special education both before Kindergarten and after 12th grade
- Increased inclusion of students with disabilities in general education settings

Many of these factors are addressed comprehensively in the body of this report. The final factor, increased inclusion, deserves a more thorough explanation

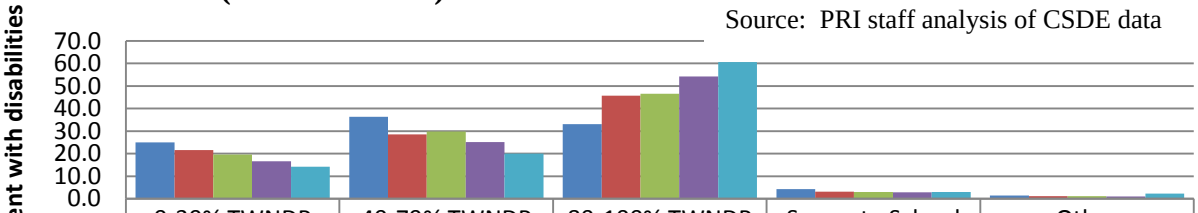
Time With Non-Disabled Peers (TWNDP)

One of the central tenets of the Individuals with Education Act (IDEA), dating back to its enactment in 1975, is that students should be educated with their non-disabled peers to the greatest extent possible. Initially, students with disabilities were educated in separate classroom within general education schools (as opposed to attending separate schools or not attending school at all). Throughout the last two decades there have been increased efforts to educate student with disabilities not only in the schools attended by their peers but also in the same classrooms in which their non-disabled peers are receiving instruction as much of the time as possible. The way compliance with this overarching goal of the IDEA is measured is by tracking the percentage of identified special education students spending certain amounts of time during the school day with their non-disabled peers. The federal government currently asks that students with disabilities attending general education schools be identified and reported within the categories of spending less than 40 percent, 40-79 percent, or 80 percent or more of their "time with non-disabled peers" (TWNDP).

Figure F-5 illustrates the national shift from educating the majority of students with disabilities in self-contained classrooms for much or most of the time in 1990 to educating the majority of such students in regular education classroom in 2010. Although the metric reported to the federal government and used to label the figure are the percentages of students at the 0-39 percent, 40-79 percent, or 80-100 percent TWNDP, these labels could also be understood to mean at the lower end "educated primarily in separate classes," "educated primarily in a resource room environment," and, at the upper end, "educated primarily in the regular education environment."

Figure F-5. Percent Students with Disabilities by Education Environment (U.S. 1990-2010)

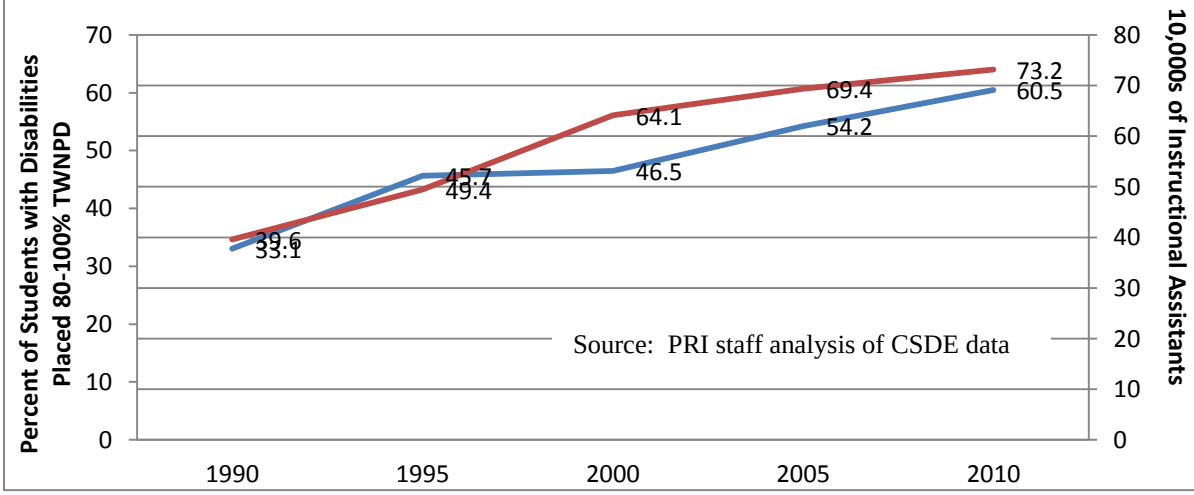
Source: PRI staff analysis of CSDE data



	0-39% TWNDP	40-79% TWNDP	80-100% TWNDP	Separate School	Other
1990	25.0	36.4	33.1	4.2	1.4
1995	21.5	28.5	45.7	3.1	1.2
2000	19.5	29.8	46.5	3.0	1.2
2005	16.7	25.1	54.2	2.9	1.0
2010	14.2	20.1	60.5	3.0	2.3

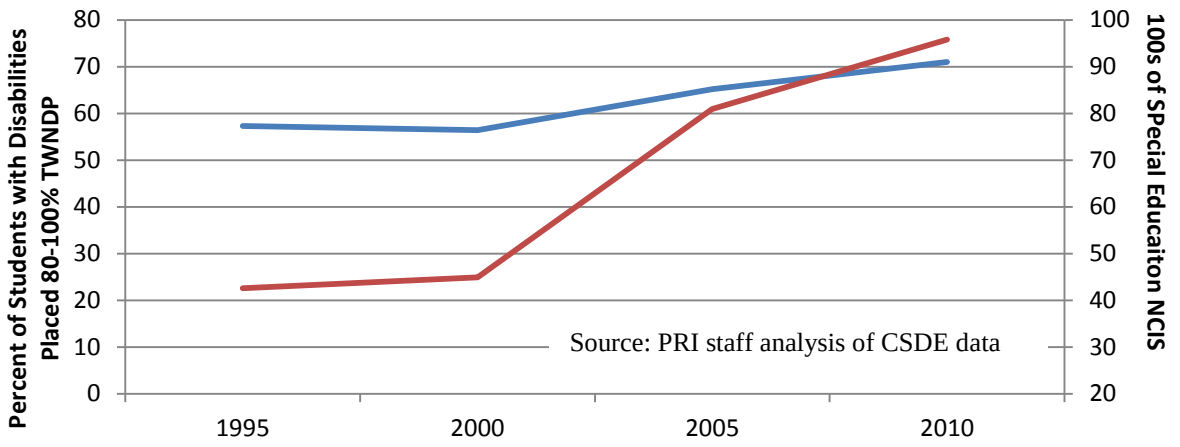
As has been previously noted, a majority of instructional paraprofessionals in public schools are identified as "special education instructional assistants." It therefore comes as no surprise that increases in the rates of inclusion of students with disabilities over the past two decades correspond with the increased use of paraprofessionals. Figure F-6, illustrates this correspondence at the national level, showing that during the period from1990 to 2010, the number of instructional assistants in public elementary and secondary schools increased from almost 40,000 to over 73 percent (an increase of approximately 85 percent) while the rate at which students with disabilities were educated in inclusive classrooms experienced a comparable increase from 33 percent inclusion to 60 percent inclusion (an increase of approximately 83 percent).

Figure F-6. Comparison of Trend Lines: Instructional Assistants and Placement 80-100% TWNDP (U.S. 1990-2010)



Connecticut's data differs from the national data. Connecticut was ahead of the national trend on inclusive education, as measured by TWNDP, but was behind the national trend on the use of NCIS specifically to support the education of students with disabilities. Figure F-7 shows these different trajectories of these two trend lines for the state of Connecticut from 1995 to 2010. Already in 1995, Connecticut was educating almost 60 percent of all students with disabilities primarily in general education settings. At that time, however, there were fewer than 4,500 special education paraprofessionals statewide. The number of special education paraprofessionals increased only modestly between 1995 and 2000, and the inclusion rate was essentially flat. Starting around the year 2000, the inclusion rate began increasing steadily, as did the number of special education paraprofessionals, albeit at a greater pace. The inclusion rate increased about 23 percent, from 57.3 percent to over 70 percent, while the number of paraprofessionals increased 80 percent, from 4,496 in 2000 to 8,094 in 2005.

Figure F-7. Comparison of Trend Lines: Special Education Instructional Assistants and Placement 80-100% TWNDP (CT 1995-2010)



Many advocates for students with disabilities and their parents suggested that PRI consider the impact of the 2002 "P.J. Consent Decree" on rates of inclusion and thus on paraprofessional utilization. That consent decree, settling a case brought in 1991 on behalf of students with intellectual disabilities who were not being educated in general education settings, required school districts to begin including as many students with disabilities as possible in general education settings and to increase the percentage of time such students spent with non-disabled peers. It appears that the P.J. case may have been a significant factor in both the increased inclusion rates and the dramatic increase in special education paraprofessionals. The increase in special education paraprofessionals would reflect the fact that students with intellectual disabilities and students with autism (who often have intellectual disabilities even though their special education service category is autism) are most frequently assigned 1:1 paraprofessional support within Connecticut's public schools, as demonstrated by the PRI survey to special education directors and other data sources.

Appendix G

State Administrative Complaints: CSDE Documents and Recommended Form

Sections from two CSDE documents are reproduced here: the subsection on State Administrative Complaint Procedures within the State Complaint Procedures section of the July 2011 revision of the Procedural Safeguards Notice Required Under IDEA Part B; and the first paragraph of the December 2011 revision of the Complaint Resolution Process manual. The final document reproduced in this appendix is CSDE's recommended form for the submission of an administrative complaint.

From: CSDE Procedural Safeguards Notice Required Under IDEA Part B

STATE COMPLAINT PROCEDURES

DIFFERENCES BETWEEN STATE ADMINISTRATIVE COMPLAINTS AND DUE PROCESS HEARINGS

The regulations for Part B of IDEA have different procedures for state administrative complaints and for due process hearings. As explained in greater detail below, any individual or organization may file a state complaint alleging a violation of any Part B requirement or any state statute or regulations relating to the provision of special education to eligible children by a school district, the Connecticut State Department of Education (CSDE) or any other public agency responsible for providing services under state statutes or regulations regarding the provision of special education and related services.

Only you or a school district may file for a due process hearing on any matter relating to a proposal or a refusal to initiate or change the identification, evaluation, or educational placement of a child with a disability, or the provision of a free appropriate public education to the child.

An investigation of a state administrative complaint must be completed within a 60-calendar-day timeline unless the timeline is properly extended. An impartial hearing officer must conduct a due process hearing (if not resolved through a resolution meeting or through mediation) and issue a written decision within 45 calendar days after the end of the resolution period, unless the hearing officer grants a specific extension of the timeline at your request or the school district's request.

The state administrative complaint and due process resolution and hearing procedures are described more fully below. The CSDE has developed model forms to help you file for a due process hearing and help you or other parties to file a state complaint. You may access this information on the CSDE Web site at www.sde.ct.gov. Under Quicklinks, click onto Special Education; scroll down to Legal/Due Process and look for the forms for Administrative Complaint, Mediation, Hearing and Advisory Opinion.

STATE ADMINISTRATIVE COMPLAINT PROCEDURES

34 CFR 300.151; Complaint Resolution Process

GENERAL

The CSDE has a written procedure for resolving any complaint, including a complaint filed by an organization or an individual from another state, and has a procedure for the filing of a complaint with the CSDE. The state complaint procedures are available on the CSDE Web site as indicated above (www.sde.ct.gov, Under Quicklinks, click onto Special Education; scroll down to Legal/Due Process and look for Complaint Resolution Process). If in its investigation of the complaint, the CSDE finds that a school district has failed to provide appropriate services, the CSDE must address:

1. the failure of the school district to provide appropriate services, including corrective action appropriate to address the needs of the child (such as compensatory services or monetary reimbursement); and
2. appropriate future provision of services for all children with disabilities.

STATE COMPLAINT PROCEDURES; TIME EXTENSION; FINAL DECISION, IMPLEMENTATION

34 CFR 300.152

The CSDE shall make and issue a decision about the issues in the complaint within 60 calendar days after the complaint is filed with the CSDE. The 60-calendar-day limit may be extended if the:

1. CSDE believes there are exceptional circumstances with respect to this complaint; or
2. complainant and the school district agree to mediation.

In making a decision, the CSDE shall:

1. carry out an on-site visit as appropriate, if the CSDE believes it must be done;
2. give the complainant a chance to give, orally or in writing, more facts about the complaint;
3. provide the school district with the opportunity to respond to the complaint, which may include:
   a. if the school district so desires, a proposal to resolve the complaint and
   b. an opportunity for the complainant and the school district to go to mediation.
4. review all the facts regarding the complaint and decide if the school district failed to meet the law or the regulations; and
5. send out a written decision to the complainant. The decision will rule on each issue raised in the complaint and contain the facts on which the decision was based, how the facts were related to the decision and the reasons for the decision.
6. Carry out other activities that may be appropriate to the investigation.

The carrying out of the CSDE's decision may include:

1. assistance to the school district by the CSDE;
2. talks to help the parent and the school district agree to terms to resolve the complaint; and
3. actions for the school district to take to meet the law.

STATE COMPLAINTS AND DUE PROCESS HEARINGS

You may also request a hearing even if a complaint has been filed; however, the CSDE will not look into any part of a complaint that is part of the due process hearing until the final decision of the hearing is made. Any issue in the complaint that is not part of the due process hearing must be resolved following the steps above in this section. If an issue is raised in a complaint that was already decided in a due process hearing with you and the school district, the hearing decision is final and will not be reviewed by the CSDE. The CSDE will inform the person who files the complaint that a review will not be done. If a complaint states that the school district has failed to carry out the final decision of the due process hearing, the CSDE shall resolve the complaint.

FILING A STATE ADMINISTRATIVE COMPLAINT

34 CFR 300.153; Complaint Resolution Process

The complaint must claim a violation that occurred not more than one year before the date that the complaint is received. An organization or a person may file a signed complaint in writing. The person or organization filing the complaint is called the complainant.

The complaint must state:

1. the school district or the CSDE or any other public agency that is responsible for providing services under Part B of IDEA or state statutes or regulations regarding the provision of special education and related services did not carry out the federal (IDEA) or the state laws that protect children who are disabled;
2. the facts on which the complaint is based; and
3. the signature and contact information for the person or organization filing the complaint.

If the complaint involves a specific child, the complaint shall include:

1. the name and address of the child;
2. the name of the school the child is attending;
3. in the case of a homeless child, the available contact information for the child and the name of the school the child is attending;
4. a description of the nature of the problem of the child, including the facts related to the problem; and
5. a proposed resolution of the problem to the extent known and available to the complainant at the time the complaint is filed.

The person or organization filing the complaint must send a copy of the complaint to the school district against whom the complaint is filed at the same time the complaint is filed with the CSDE. The mailing address for the CSDE is:

Connecticut State Department of Education
Bureau of Special Education
Due Process Unit, P.O. Box 2219
Hartford, CT 06145-2219
Fax: 860-713-7153

A model state complaint form is available on the CSDE website:

http://www.ct.gov/sde/lib/sde/PDF/DEPS/Special/Due_Process_Forms.pdf

It is not required that this form be used to file a complaint. However, please note that the information listed in the form is the information that must be provided when a complaint is filed with the CSDE.

From: <u>Complaint Resolution Process</u>

<u>CONNECTICUT STATE DEPARTMENT OF EDUCATION</u>
Bureau of Special Education
Procedures for Complaints Regarding Special Education

Any individual or organization (the "complainant") may submit to the Connecticut State Department of Education a written complaint that claims that a Connecticut education agency, as defined in this document, has failed to comply with a requirement of the Individuals with Disabilities Education Act (IDEA - the federal special education law) or with a requirement of the Connecticut laws regarding special education. The complaint procedures are available to resolve disagreements over any matter concerning the identification, evaluation or the educational placement of a student or the provision of a free and appropriate public education to such student. The Bureau of Special Education will review and address each submitted complaint. In addition, a complaint alleging that an education agency has failed to implement a special education due process decision will be reviewed and resolved through this complaint process.

CSDE Recommended Form for Filing of Special Education Complaints

Connecticut State Department of Education - Bureau of Special Education
Special Education Complaint Form

This is a recommended form for the filing of special education complaints. You do not have to use this form to file a complaint although it will help you to include the required information. (Questions may be directed to Bureau staff at 860-713-6928.) Please complete this form and forward to the parents or school district (as appropriate) and send a copy to:

State Department of Education
Bureau of Special Education
P.O. Box 2219 – Room 364
Hartford, CT 06145-2219

Date:*_____ Person/Agency filing the complaint:_____

Address:_____Phone:_____
(street)

_____ Email:*_____
(town) (state) (zip)

Parent's Name (if different):*_____Phone:*_____

Child's Name _____|_____Date of Birth*_____
(last) (middle) (first)

Education Agency (school district)*_____

Name of School the Child Attends_____ Disability Category*_____

Child's Address: _____
(street)

_____
(town) (state) (zip)

Be specific as to why you believe that a requirement of the Individuals with Disabilities Education Act has been violated. Include a description of the relevant facts, the nature of the child's problem and a proposed resolution of the problem to the extent known and available at this time. Please forward a copy of this complaint to the education agency. If necessary, you may attach additional sheets as well as documentation of your complaint allegations.

_____

_____

_____

_____

_____

_____
Signature of Complainant_____

*Information requested is optional

Revised February 2012

Appendix H

Regulations Concerning Use of Restraint and Seclusion in Public Schools

Use of Seclusion and Restraint in Public Schools

Sec. 10-76b-5. Use of physical restraint and seclusion in public schools. Definitions

For the purposes of sections 10-76b-6 to 10-76b-11, inclusive, of the Regulations of Connecticut State Agencies:

(1) ‘‘Assistant’’ means ‘‘assistant’’ as defined in section 46a-150 of the General Statutes;

(2) ‘‘Behavior intervention’’ means supports and other strategies developed by the planning and placement team to address the behavior of a person at risk which impedes the learning of the person at risk or the learning of others;

(3) ‘‘Business day’’ means ‘‘business day’’ as defined in subsection (a) of section 10-76h-1 of the Regulations of Connecticut State Agencies;

(4) ‘‘Individualized education plan’’ or ‘‘IEP’’ means ‘‘individualized education plan’’ as defined in section 10-76a-1 of the Regulations of Connecticut State Agencies;

(5) ‘‘Parent’’ or ‘‘parents,’’ means ‘‘parents’’ as defined in section 10-76a-1 of the Regulations of Connecticut State Agencies;

(6) ‘‘Person at risk’’ means ‘‘person at risk’’ as defined in subparagraph (A) of subdivision (3) of section 46a-150 of the Connecticut General Statutes;

(7) ‘‘Physical restraint’’ means ‘‘physical restraint’’ as defined in section 46a-150 of the Connecticut General Statutes;

(8) ‘‘Planning and placement team’’ or ‘‘PPT’’ means ‘‘planning and placement team’’ as defined in section 10-76a-1 of the Regulations of Connecticut State Agencies;

(9) ‘‘Provider’’ means ‘‘provider’’ as defined in section 46a-150 of the Connecticut General Statutes; and

(10) ‘‘Seclusion’’ means ‘‘seclusion’’ as defined in section 46a-150 of the Connecticut

General Statutes, provided seclusion does not include any confinement of a person at risk in which the person is physically able to leave the area of confinement including, but not limited to, in-school suspension and time-out.

(Adopted effective May 7, 2009)

Sec. 10-76b-6. Use of physical restraint and seclusion in public schools

No provider or assistant shall (1) use involuntary physical restraint on a person at risk or (2) involuntarily place a person at risk in seclusion, unless such use conforms to the requirements of sections 46a-150 to 46a-154, inclusive, of the Connecticut General Statutes, and the requirements of sections 10-76b-5 to 10-76b-11, inclusive, of the Regulations of Connecticut State Agencies.

(Adopted effective May 7, 2009)

Sec. 10-76b-7. Use of physical restraint and seclusion in public schools, exceptions

Nothing in sections 46a-150 to 46a-154, inclusive, of the Connecticut General Statutes or sections 10-76b-5 to 10-76b-11, inclusive, of the Regulations of Connecticut State Agencies shall be construed to interfere with the responsibility of local or regional boards of education to maintain a safe school setting in accordance with section 10-220 of the Connecticut General Statutes or to supersede the provisions of subdivision (6) of section 53a-18 of the Connecticut General Statutes concerning the use of reasonable physical force.

(Adopted effective May 7, 2009)

Sec. 10-76b-8. Use of seclusion in public schools, requirements

(a) Except for an emergency intervention to prevent immediate or imminent injury to the person or to others conforming to the requirements of subsection (b) of section 46a-152 of the Connecticut General Statutes, seclusion may only be used if (1) this action is specified in the IEP of the person at risk and (2) if other less restrictive, positive behavior interventions appropriate to the behavior exhibited by the person at risk have been implemented but were ineffective.

(b) If the PPT of a person at risk determines, based upon the results of a functional assessment of behavior and other information determined relevant by the PPT, that use of seclusion is an appropriate behavior intervention, the PPT shall include the assessment data and other relevant information in the IEP of the person at risk as the basis upon which a decision was made to include the use of seclusion as a behavior intervention. In such a case, the IEP shall specify (1) the location of seclusion, which may be multiple locations within a school building, (2) the maximum length of any period of seclusion, in accordance with subsection (d) of this section, (3) the number of times during a single day that the person at risk may be placed in seclusion, (4) the frequency of monitoring required for the person at risk

while in seclusion, and (5) any other relevant matter agreed to by the PPT taking into consideration the age, disability and behaviors of the child that might subject the child to the use of seclusion.

(c) In the event the parent disagrees with the use of seclusion in the IEP of the person at risk, the parent shall have a right to the hearing and appeal process provided for in section 10-76h of the Connecticut General Statutes.

(d) Any period of seclusion (1) shall be limited to that time necessary to allow the person at risk to compose him or herself and return to the educational environment and (2) shall not exceed one hour. The use of seclusion may be continued with written authorization of the building principal or designee to prevent immediate or imminent injury to the person at risk or to others. In the case where transportation of the person at risk is necessary, the written authorization to continue the use of seclusion is not required if immediate or imminent injury to the person at risk or to others is a concern.

(e) The PPT shall, at least annually, review the continued use of seclusion as a behavior intervention for the person at risk. When the use of seclusion as a behavior intervention is repeated more than two times in any school quarter, the PPT (1) shall convene to review the use of seclusion as a behavior intervention, (2) may consider additional evaluations or assessments to address the child's behaviors, and (3) may revise the child's IEP, as appropriate.

(f) The PPT shall inquire as to whether there are any known medical or psychological conditions that would be directly and adversely impacted by the use of seclusion as a behavior intervention. A person at risk shall not be placed in seclusion if such person is known to have any medical or psychological condition that a licensed health care provider has indicated will be directly and adversely impacted by the use of seclusion. For purposes of this subsection, a ''licensed health care provider'' means (1) a legally qualified practitioner of medicine, (2) an advanced practice registered nurse, (3) a registered nurse licensed pursuant to chapter 378 of the Connecticut General Statutes, or (4) a physician assistant licensed pursuant to chapter 370 of the Connecticut General Statutes. Such licensed health care provider may be the person at risk's licensed health care provider or a licensed health care provider utilized by the public schools to provide an evaluation of the person at risk for purposes of determining the appropriate use of seclusion as a behavior intervention in the person at risk's IEP. As part of the assessments described in subsection (b) of this section, the PPT may request a medical or psychological evaluation of the child for purposes of determining whether there is a medical or psychological condition that will be directly and adversely impacted by the use of seclusion as a behavior intervention. The parent may provide that information to the PPT. Any written statement provided by a licensed health care provider shall be included in the educational record of the person at risk.

(g) A person at risk in seclusion shall be monitored as described in the child's

IEP by a provider or assistant specifically trained in physical management, physical restraint and seclusion procedures including, but not limited to, training to recognize health and safety issues for children placed in seclusion to ensure the safe use of seclusion as a behavior intervention.

(h) Any room used for the seclusion of a person at risk shall: (1) Be of a size that is appropriate to the chronological and developmental age, size and behavior of the person at risk; (2) Have a ceiling height that is comparable to the ceiling height of the other rooms in the building in which it is located; (3) Be equipped with heating, cooling, ventilation and lighting systems that are comparable to the systems that are in use in the other rooms of the building in which it is located; (4) Be free of any object that poses a danger to the person at risk who is being placed in the room; (5) Have a door with a lock only if that lock is equipped with a device that automatically disengages the lock in case of an emergency. Not later than January 1, 2014, the locking mechanism of any room in a public school specifically designated for use as a seclusion room shall be a pressure sensitive plate. Any latching or securing of the door, whether by mechanical means or by a provider or assistant holding the door in place to prevent the person at risk from leaving the room, shall be able to be removed in the case of any emergency. An ‘‘emergency’’ for purposes of this subdivision includes, but is not limited to, (A) the need to provide direct and immediate medical attention to the person at risk, (B) fire, (C) the need to remove the person at risk to a safe location during a building lockdown, or (D) other critical situations that may require immediate removal of the person at risk from seclusion to a safe location; and (6) Have an unbreakable observation window located in a wall or door to permit frequent visual monitoring of the person at risk and any provider or assistant in such room. The requirement for an unbreakable observation window does not apply if it is necessary to clear and use a classroom or other room in the school building as a seclusion room for a person at risk.

(Adopted effective May 7, 2009)

Sec. 10-76b-9. Parental notification of physical restraint, seclusion

(a) If a person at risk is physically restrained or placed in seclusion, an attempt shall be made to notify the parent on the day of, or within twenty-four hours after, physical restraint or seclusion is used with the child as an emergency intervention to prevent immediate or imminent injury to the person or others, as permitted under sections 46a-150 to 46a-154, inclusive, of the Connecticut General Statutes. Such notification shall be made by phone, e-mail or other method which may include, but is not limited to, sending a note home with the child. The parent of such child, regardless of whether he or she received such notification, shall be sent a copy of the incident report no later than two business days after the emergency use of physical restraint or seclusion. The incident report shall contain, at a minimum, the information required under subsection (d) of section 46a-152 of the Connecticut General Statutes.

(b) Where seclusion is included in the IEP of a person at risk, the PPT and the parents shall determine a timeframe and manner of notification of each incident

of seclusion.

(c) The Department of Education shall develop a plain language notice for use in the public schools to advise parents of the laws and regulations concerning the emergency use of physical restraint or seclusion or the use of seclusion as a behavior intervention in a child's IEP. On and after October 1, 2009, this notice shall be provided to the child's parent at the first PPT meeting following the child's referral for special education. For children who were eligible for special education prior to October 1, 2009, the notice shall be provided to the parent at the first PPT meeting convened after October 1, 2009. The notice shall also be provided to a child's parent at the first PPT meeting at which the use of seclusion as a behavior intervention is included in the child's IEP.

(Adopted effective May 7, 2009)

Sec. 10-76b-10. Required training for providers or assistants on the use of physical restraint or seclusion

A person at risk may be physically restrained or removed to seclusion only by a provider or assistant who has received training in physical management, physical restraint and seclusion procedures. Providers or assistants shall also be provided with training as described in subdivision (2) of subsection (a) of section 46a-154 of the Connecticut General Statutes.

(Adopted effective May 7, 2009)

Sec. 10-76b-11. Reports of physical restraint, seclusion

The recording and reporting of instances of physical restraint or seclusion and the compilation of this information shall be in accordance with section 46a-153 of the Connecticut General Statutes. The recording of such instances shall be done on a standardized incident report developed by the Department of Education. Such reports shall be completed no later than the school day following the incident.

(Adopted effective May 7, 2009)

Appendix I

CSDE Brief on Paraprofessionals Viewing IEP's and Attending PPT Meetings

Connecticut State Department of Education (CSDE) Brief on Paraprofessionals Viewing Student's Individual Education Programs (IEPs) and Attending Program and Placement Team (PPT) Meetings

The CSDE regularly receives questions regarding confidentiality and the appropriateness of paraprofessionals viewing student's IEPs and attending IEP Team Meetings. The purpose of this article is to clarify the "myth" surrounding confidentiality of certain student information and inform public school districts of their responsibilities under the Family Educational Rights and Privacy Act (FERPA).

Where a paraprofessional supports a child eligible for special education, it is important that the paraprofessional understand what is expected of them within the context of the implementation of the child's IEP. Access to the child's IEP is one means of achieving this familiarity with the services included in the child's IEP and understanding the role of the paraprofessional in the implementation of the child's IEP. Disclosure of information from the child's IEP by the supervising teacher and other staff working with the child would also be appropriate. Each child's record has an access sheet included in the front of the individual record. If a staff member accesses the child's record, they must sign in on the access form indicating the reason they are accessing the child's record.

This law affects the role of the paraprofessional who works or has access to confidential information. Information about a student is confidential and should only be shared with teachers and staff who work directly with the student. Paraprofessionals who type, collect and store education records need to be aware that the written data is confidential and should not be shared with persons outside the educational team.

Paraprofessionals are neither required members of the IEP team under the Individuals with Disabilities Education Act (IDEA) nor are paraprofessionals required members of the state defined planning and placement team. Although the IDEA says "the IEP team for each child with a disability includes…at the discretion of the parent or school district, other individuals who have knowledge or special expertise regarding the child…", the paraprofessional is employed by the school district and the school district will determine whether it is appropriate or feasible for the paraprofessional to attend the child's IEP team meeting just as the district determines the appropriate staff members generally for the child's IEP team meeting.

It is important that district or school personnel explain their policy on the attendance of paraprofessionals at PPTs to both parents and schools staff. If a paraprofessional is required on the IEP and not attending a student's PPT meeting; it is the responsibility of the student's teacher and the paraprofessional's supervisor to communicate in detail with the paraprofessionals about the student, before the IEP team meeting (Connecticut Guidelines, p. 29).

Resources

Connecticut State Department of Education (2012). Connecticut Guidelines for Training and Support of Paraprofessionals, Hartford, CT: Author
http://www.sde.ct.gov/sde/lib/sde/pdf/cali/guidelines_paraprofessionals.pdf

Family Educational Rights and Privacy Act (FERPA)
http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html.

For more information, please contact Iris White, Education Consultant, Bureau of Accountability and Improvement, 860-713-6794 or iris.white@ct.gov.

Appendix J

Agency Response

STATE OF CONNECTICUT

STATE BOARD OF EDUCATION

February 25, 2015

Senator John W. Fonfara
Co-Chair, Legislative Program Review
And Investigations Committee
State Capitol, Room 506
Hartford, CT 06106

Representative Christie M. Carpino
Co-Chair, Legislative Program Review
And Investigations Committee
State Capitol, Room 506
Hartford, CT 06106

Dear Senator Fonfara and Representative Carpino:

The Connecticut State Department of Education (CSDE) wishes to thank the Connecticut General Assembly for the opportunity to provide a response to the Legislative Program Review and Investigations Committee report titled *School Paraprofessional Staffing*. The full report offers a comprehensive look at the current status of educational paraprofessionals in Connecticut.

The Department is currently reviewing the report and its implications, and studying the recommendations for both the CSDE and those that may impact local school districts. In addition, the report has been shared with the School Paraprofessional Advisory Council. The Council is also reviewing this report along with the final recommendations that pertain to its function. The Council will continue to discuss the implementation of these recommendations and I expect the Council will share its feedback with the CSDE.

The CSDE shares the Committee's goal of ensuring that paraprofessionals are adequately prepared, trained and informed to effectively carry out their responsibilities. As part of the CSDE's initial review of the report, staff members are working to identify those recommendations that may be able to be carried out by July 1, 2015, those that may take a longer time to implement, and those that may require further review and discussion.

The CSDE looks forward to working together with key stakeholders regarding this report and will provide additional comment during this legislative session as needed.

If you have questions regarding the CSDE's review of the *School Paraprofessional Staffing* report and/or other related questions, please contact Charlene Russell-Tucker, Chief Operating Officer at (860) 713-6550.

Sincerely,

Dianna R. Wentzell

Dr. Dianna R. Wentzell
Interim Commissioner of Education

DRW:lj

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