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Linda T. Wise
Deputy Superintendent
Howard County Public School System
10910 Clarksville Pike
Ellicott City, MD 21042

Dear Linda,

As requested, DMC is pleased to respond to some remaining questions. The District Management Council customizes our work and recommendations to reflect the specific needs, culture, size and location of each district we partner with. At the same time, DMC grounds our recommendations in a very well established and researched set of best practices drawn from multiple sources. This is clearly explained in our proposal.

We balance using the same best practices as our guide posts across all districts by customizing our recommendations. The nature of best practices is that they are well researched and proven effective strategies for helping struggling students across the country. They help students achieve and thrive in not just one district but in most districts.

Therefore the general direction of our work will be similar across many districts since the same best practices guide our recommendations but which areas need to be addressed, when and how to move forward and many other aspects of implementation will be different from district to district.

Also in some districts an opportunity may be a commendation and vice versa.

The remaining questions provided, are questions that we have already answered. I have enclosed the questions provided in bold below and can only reiterate the answers already provided.

DMC and HCPSS failed to obtain approval from an Institutional Review Board or Ethics Panel prior to conducting this study. Despite DMC's response that "our data gathering is not a formal research study, but a regular practice of managing a school system", DMC frequently refers to "the study" or "the research" in their own report. And I don't believe the surveys, interviews and focus groups are standard practice of managing a school system. Standard practice does not require a \$300,000 fee for an outside group to conduct a formal assessment of a program; this was anything but standard practice. More troubling, however, is that participants in this study, i.e. survey respondents, interviewees, focus group participants, were not given any assurances of confidentiality of their responses. Survey respondents provided information that was potentially identifying and focus group participants/interviewees, including HCPSS employees, were asked questions, the responses to which may not have shown HCPSS in a favorable light. As a current IRB member and a past member of an IRB for one of the institutes within the National Institutes of Health, I would have wanted to see specific assurances of confidentiality of responses and how data would be protected; none of that was provided by HCPSS or DMC. Not only is this a violation of 45 CFR 46 (<http://www.hhs.gov/ohrp/regulations-and-policy/regulations/45-cfr-46/index.html#46.102>), it also calls into question the validity of the data collected

by DMC. As a heads-up to the BoE and HCPSS, I have referred this matter to the Office of Human Research Protection and the Department of Education.

This was not a formal research study but a typical review of a school district department. This was conducted as are many other similar reviews conducted by a wide range of organizations working with public schools.

- 1. Is it even realistic or reasonable to expect that students with disabilities, particularly those with an intellectual disability, will, as a group, achieve at the same level as students without a disability? Although DMC makes a big deal about the discrepancy in achievement between regular ed and special ed students in Howard County, this discrepancy exists in all counties cited in their report. And DMC provides no information that would inform us as to educational practices in those other counties that might explain the differences among districts in the achievement gap between special ed and regular ed students; to quote William Shakespeare, “much ado about nothing.” The goal should be to educate every student to his/her potential.**

For the majority of students with mild to moderate disabilities the goal at the state and federal level is to help them master grade level material. A small number of students with more severe disabilities, including those with cognitive disabilities may have different goals and expectations.

- 2. The response rate for the parent survey was never provided to me by DMC or HCPSS although it should be an easy number to calculate; DMC’s response was “There were 302 responses.” – that’s not a rate. The rate would be the number of actual responses divided by the number of possible responses. I’m going to estimate that the survey should have been sent to about 4,000 families, based on an estimate of ~8% of HCPSS students have an IEP. Using 4,000 as the denominator (although it could be higher given that both parents could have responded to the survey per DMC’s responses), that would mean the response rate was less than 8%! That paltry a response rate tells me two things: 1) Little to no effort was made to elicit participation of parents of a student with an IEP; and, 2) HCPSS is failing in its Vision 2018, Goal 3: Families. An engaged family with a student with an IEP would have gladly provided responses to the survey – and then some. Honestly, I don’t know any parent of a student with a disability who does not voice their opinion regarding their child’s education.**

Along similar lines, the parents chosen to participate in the parent focus group were hand-picked. They were all either employees of HCPSS or members of organizations like the ARC of Howard County. In addition, there was no diversity – it was a pretty “lily white” group. DMC/HCPSS provided no response to my questions “Was there any attempt to solicit participation of plain old ordinary parents of kids with disabilities?” or “Was there any attempt to obtain racial/ethnic diversity of the Parents group?”, but I think the answer is obvious to both questions – “NO!” For a system that likes to pride itself on its diversity – at least in words – this was a monumental failure; I give you a grade of F.

The district, not DMC, administered the online survey of parents and organized the parent and staff focus groups. DMC cannot provide any other details as to their administration.

- 3. It is standard practice to summarize open-ended responses to survey items as well as information obtained from focus groups and interviews. One would typically conduct a thematic analysis to highlight common “themes” provided by respondents. DMC did none of this with the excuse that “...DMC and Howard County**

Public School System determined not to provide any summary of these qualitative responses in the Highlights for Sharing report, given the nature of open-ended questions that result in nearly each response being different and perhaps identifying the respondent or their child.” This response tells me that DMC (besides throwing HCPSS under the proverbial bus), doesn’t understand or have experience with qualitative data analysis. Of course no responses are exactly alike but it is typical to see common themes/issues/ideas run across responses from different individuals. And summarizing the responses and highlighting common themes removes the possibility of identifying respondents or their children. How do you use the qualitative data if you don’t do any kind of analysis of it? Do you “cherry-pick” the responses that support your pre-conceived ideas as to how special ed should be administered? I noted that in the recent report provided by Hanover Research regarding religious holiday observances, they conducted a standard thematic analysis without identifying respondents. As I said, it is standard practice and there is even software that will assist in the analysis.

The focus groups and surveys are intended to inform the final recommendations but were not intended to be a standalone report or deliverable.

- 4. In their response to my questions, DMC provided an “Appendix: Supporting Research on Best Practices.” Much of what DMC recommends is based on these “best practices” and not on any data they collected as part of the Special Ed Opportunities Review. Here is my question for HCPSS and the BoE: Wouldn’t/shouldn’t senior leadership of HCPSS (e.g., Superintendent, Deputy Superintendent, Executive Director Accountability, Executive Director Special Ed, Instructional Specialists, and even Senior Teachers) be aware of best practices regarding special education? Did it take an outside group at a cost of \$300,000 to inform HCPSS as to best practices? It seems to me that if HCPSS was concerned about special ed student achievement they could/should have conducted their own review of current practices within the school system and compared them to “best practices” and then make a determination as to what changes in instructional practices, including staff utilization, would likely result in an increase in special ed student achievement. I think the goal of increasing special ed student achievement got lost in the DMC effort and was more a cost-cutting mission couched in terms of achievement as opposed to a true attempt to alter instructional practice in order to increase achievement of special ed students.**

The goal of the review was first and foremost to help the district better serve students with disabilities and raise achievement across multiple measures. We believe the opportunities identified would serve students well.

Sincerely,

Nathan Levenson
President