All Means All: Drafting Student Accommodations that Facilitate Access, Equity and Student Resiliency

Presented by:

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Road Map

- Through the MTSS Lens
- What are SST objectives?
- What are Section 504 objectives?
- How do we build accommodations to ensure access, equity and fidelity in implementation?
- How do we build accommodations to grow student independence and resilience over time?
Through the CA MTSS Lens

- Multi-tiered SYSTEM of Support: “All Means All” - Whatever it takes!
- Framework for meeting each and every student’s academic, behavioral and social-emotional needs.
- Layered support

How about if we add…

Looking at student’s academic, behavioral, social-emotional and **physical** needs.
Desired State: No Barriers

- **Equality**
  - Everyone benefits from the same supports.
- **Equity**
  - Everyone gets the supports they need.
- **No Barriers**
  - Supports and accommodations are not needed because systemic barriers have been removed.

How? Use Existing Structures

- SIT
- SST
- Student
- Grade/Course
- Family
- IDEA
- 504
Grade Level/Course Teams

• **What?**
  – Grade level or course-based professional learning community.

• **When/Why?**
  – Meet bi-weekly to brainstorm and develop classroom supports for students of concern. Student feedback or interview critical.

• **Structure or Procedures?**
  – Each teacher seeks input on students of concern. Team brainstorms possible supports and reviews progress. Team notes may include checklist of supports categorized as physical health, environmental, curricular, behavioral, and social-emotional. All supports should include student feedback/interview. If insufficient progress, makes referral to SIT.
  – Team completes SIT request form as well as cum review prior to SIT.

• **Outcomes?**
  – Support teacher in implementation and documentation of classroom supports.

Student Support/Intervention Team

• **What?**
  – General education teacher meeting with specialists (e.g., Ed Specialist, psychologist, speech and language pathologist, mental health specialist, nurse, site administrator, etc…)

• **When/Why?**
  – Meet weekly to consider SIT Request.

• **Structure or Procedure?**
  – Develop Student Success Plan (SSP) for highest priority concerns. Student feedback or interview critical.
  – SSP includes assessed current status, desired outcome, targeted intervention, how the intervention will be measured, intervention start date and progress monitoring notes.

• **Outcomes?**
  – Specific, measurable interventions are developed and monitored
Student Study Team

- **What?**
  - SST team meets with **parent and student** (as appropriate based on grade level and discussion). Student feedback or interview critical.

- **When/Why?**
  - Review student success plan and progress.

- **Structure or Procedure?**
  - Discuss options for next steps:
    - Continue with general education interventions
    - Make referral for Section 504 evaluation or IDEA evaluation

- **Outcomes?**
  - Decide pathway moving forward.

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Least Restrictive Environment Principles

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504

IDEA

General Education
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Child Find: Health Red Flags

- When a student has significant absences that are medically related (physical or mental health).
- When a student has a chronic health condition.
- When general education Home Hospital Instruction is extended multiple times.
- When substance abuse is suspected.

Child Find: Academic/Behavioral Red Flags

- When a student shows a pattern of not benefiting from the instruction provided.
- When a student is evaluated, determined not IDEA eligible, but academic or behavioral concerns exist.
- When suspension occurs more than 2 times per year or expulsion is being considered.
Section 504 of the Rehabilitation Act of 1973

• What?
• When/Why?
• Structures or Procedures?
• Outcomes?

What is Section 504?

• Federal Civil Rights Statute
• Prohibits discrimination on the basis of disability
• Ensures disabled students are provided with equal access to the educational environment
When and Why Should a Section 504 Plan Be Implemented?

- After conducting an evaluation, a multi-disciplinary team determines that the student has a **physical or mental impairment** that **substantially limits** one or more **major life activities** AND

- That impairment results in a long-term need for support within the school system.

Section 504 Expected Outcome

- To ensure that qualified disabled students have equal access to the educational environment.
Now… Going Back to the Key MTSS Questions:

• How do we ensure access to all; and under Section 504, equal access, in particular, for disabled students, academically, behaviorally, social-emotionally and physically?
  – Accommodations and supports!

• How do we build accommodations to ensure access, equity and fidelity in implementation?

• What we know: Accommodations are not helpful if they are not clear, and also are not helpful if they are not (or cannot be) implemented with fidelity.

Accommodation Writing: Practice Tip #1

• Clearly identify the difficulty student is having in the educational environment and link the accommodation or support to that particular difficulty.

Grade Level/Course Team/SIT/SST Example
Student is constantly distracted and unable to work independently.

504 Example
Student’s ADHD (impairment) substantially impacts his ability to concentrate during class instruction (MLA) and complete class work independently (MLA).
Accommodation Writing: Practice Tip #2

- **Choose** the right concept to encompass the **WHOLE CHILD**: academics, behavior, social-emotional needs, and physical health

**Potential Concepts:**
- **Preferential Seating** (How will our choice of seat impact the student academically, behaviorally, social-emotionally and physically?)
- **Visual Timer** (How will providing the student a visual timer impact the student academically, behaviorally, social-emotionally and physically?)

Accommodation Writing: Practice Tip #3

- Move from “concept” to “accommodation” and **add more specific language**.
**Preferential Seating**

- Far away from teacher
- Close to door
- Far from distraction
- Close to helpful peer
- Away from distracting peers
- Near fan/window

**Extended Time**

- On Classwork
- Till the end of semester
- Till the end of time...
- 1 extra day
- 50% extra

- What about tests?!
- Whoo Hoo! I get an extra minute to run the mile in PE!

- Teacher: It is definitely not necessary.
- If necessary
- Student: Yes, I feel it is necessary.
Let’s Try It!

- Impairment: ADHD
- MLA: Concentrating
- Concept: Preferential Seating (academics, behavior, social-emotional, physical health)
- Accommodation:

504 Nuances: 3 Questions for Any Section 504 Accommodation or Support

1. Is it directly related to the identified impairment(s)? How?
2. Is it directly related to the MLA(s) we agreed was substantially limited? How?
3. Is it necessary for Student to have an equal opportunity to access the educational environment, or has that need already been accommodated for in another way?
504 Process for Designing Accommodations

![Diagram showing the process: Impairment → Substantially Limited MLA → Why? When? → Accommodations]

**IMPAIRMENT → MLA → WHY? WHEN? → ACCOMMODATIONS**

<table>
<thead>
<tr>
<th>IMPAIRMENT</th>
<th>MLA</th>
<th>WHY? WHEN?</th>
</tr>
</thead>
<tbody>
<tr>
<td>SOCIALIZATION</td>
<td>• PEERS WON’T/DON’T TALK TO ME/INCLUDE ME AT LUNCH/BETWEEN CLASSES/GROUP PROJECTS</td>
<td></td>
</tr>
</tbody>
</table>
| ATTENDANCE            | • FEAR OF ACADEMIC FAILURE  
                         |   • FEAR OF PEER HARASSMENT/COMMENTS (OR PERCEIVED PEER HARRASSMENT/COMMENTS) |                                                                           |
| TEST TAKING           | • FEAR OF WRONG ANSWERS/NEED FOR PERFECTION  
                         |   • FEAR OF NOT FINISHING IN TIME                                           |                                                                           |
| HOMEWORK COMPLETION   | • FEAR OF WRONG ANSWERS/NEED FOR PERFECTION                          |                                                                           |
| FOCUS DURING INSTRUCTION | • PEERS ARE LOOKING AT/TALKING ABOUT ME  
                          |   • I DON’T GET IT  
<pre><code>                      |   • I MISSED SOMETHING…WHAT DID I MISS…OH, NOW I’M MISSING MORE…OKAY I’M CHECKING OUT. |
</code></pre>
<table>
<thead>
<tr>
<th>IMPAIRMENT</th>
<th>MLA</th>
<th>WHY? WHEN?</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADHD</td>
<td>TEST TAKING</td>
<td>• STUDENT SKIPS PARTS/GOES TOO FAST</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• STUDENT DOESN’T READ DIRECTIONS</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• STUDENT GETS DISTRACTED BY CLASSROOM STIMULI/GOES TOO SLOW</td>
</tr>
<tr>
<td></td>
<td>HOMEWORK COMPLETION</td>
<td>• STUDENT SKIPS PARTS/GOES TOO FAST</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• STUDENT DOESN’T READ DIRECTIONS</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• STUDENT GETS DISTRACTED BY HOME STIMULI</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• MEDICATION FOR FOCUS WEARS OFF</td>
</tr>
<tr>
<td></td>
<td>FOCUS DURING INSTRUCTION</td>
<td>• TEACHER SAID THAT TOO FAST...I MISSED IT...OH, NOW I'M MISSING MORE...OKAY I’LL THINK ABOUT WHAT’S FOR LUNCH INSTEAD.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• WHAT DOES THAT POSTER ON THE WALL SAY?</td>
</tr>
</tbody>
</table>

Building Student Capacity over Time

- Accommodations should change over time as a student gets older.

- Capacity and independence-building are important, especially at each annual review.
Case Study

Irvine Unified School District
Section 504 Accommodation Plan

Student: [Redacted]
DOR: July 4, 2006
Grade: K
School: [Redacted]
Teacher: [Redacted]

Identified Mental or Physical Impairment(s): Food Allergies, Asthma

What Major Life Activity or Activities does the impairment(s) substantially limit?
Breathing

Initial Eligibility Determination Date: 2/25/13, 3/4/13
Date This Plan Was Developed: 3/4/13
Annual Review Date: 3/4/14
3-Year Review Date: 3/4/16

SECTION IV:

Necessary Accommodations*

1. [***SEE ATTACHED DOCUMENT***]
2.
3.
4.
5.

Setting / Location

1.
2.
3.
4.
5.

Person(s) Responsible

1.
2.
3.
4.
5.
Let's Try It! Progression Over Time

How do we get from Kindergarten “See Attached Document” to Grade 7: Classroom teachers and lunch monitors shall ensure that gloves and wipes are available to student to wipe down eating and working surfaces.
Question & Answer Session

Thank You
For questions or comments, please contact:

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1. Classroom/School Wide
   a. Timmy’s classroom will be a peanut free classroom, with the exception of rainy days (See Section 5. for rainy day protocols). Teacher will ensure milk, egg, butternut squash, avocado and sunflower seeds will be avoided as much as possible in the classroom. If these items are brought into classroom, safety procedures will be used (i.e., cleaning desks).
   b. Teacher will provide Timmy separate common classroom drawing/art/writing supplies for his exclusive use. If it is not possible to have a particular separate supply Timmy will be allowed to use parent provided child sized gloves.
   c. Timmy will sit in the front of the classroom near the teacher for easy monitoring of his health condition and will not be seated next to a trash can.
   d. Staff will send Timmy (accompanied by a trained staff member) to the school health office immediately upon his request &/or when displaying health concerns. A staff member trained in EpiPen administration will stay with Timmy at all times if he is a having suspected health concern.

2. Notification to Parents
   a. Notify parents immediately after emergency procedures have been implemented.
   b. Teacher or school staff will provide parents with a minimum of two school days advance notice via email or telephone of all classroom or school-wide activities in which food or food related supplies will be included (i.e., special events, lessons involving food &/or parties involving food). If advance notice is not possible, food will not be used in the classroom activity.
   c. Parents will be provided an advance opportunity to examine food labels of all food items being used for classroom activities and offered the opportunity to provide substitute food items when necessary to keep Timmy safe.
   d. Teacher will notify room parent of classroom allergies at the beginning of the year and again prior to the room parent planning any activity that involves food.

3. Cleaning Procedures
   a. Timmy, students, teachers, and staff in Timmy’s classroom will be actively encouraged by staff to clean their hands (proper hand washing or wipes) upon entering the classroom at the beginning of the day, and upon returning from snack and lunch. In order to keep the classroom clean from his allergens, this routine is to be followed regardless of whether Timmy is absent or present at school.
   b. Parents will provide hand wipes. Teacher will provide timely notification to parents when wipes supply is low.
   c. Timmy will not be required to assume any classroom tasks involving the handling of foods, waste products or washing tables after food is present. He may clean tables when food has not been present if provided a child sized glove.
   d. Cleaning wipes used by staff must be effective for removing allergens (recommended brands that have been researched for allergen removal effectiveness include: Formula 409, Lysol Sanitizing Wipes, and Target brand cleaner with bleach). If wipes are included on the teacher’s supply list at the beginning of the school year, recommended brands of wipes will be listed.
e. Prior to the first day of school, Timmy's classroom will be thoroughly cleaned by the custodian including all classroom chairs, tables, sink/faucet, and Timmy's cubby.

f. Timmy's desk, seat, classroom sink/faucet and class door knobs will be wiped down nightly by the custodian.

g. Staff will clean Timmy's computer keyboard and mouse with a clean wipe prior to Timmy using it.

4. **Snack/Lunch Time & Recess**
   a. Timmy will have access to a staff supervised "peanut free" table to eat at during snack/lunch time.
   b. Timmy will have a designated space when eating food with other children (For Kindergarten snack time - he is to be the only one sitting on his bench).
   c. Timmy only eats foods provided from home unless prior authorization has been given by parents for other foods.
   d. Timmy will be encouraged to wash his hands thoroughly with soap and water for 15 seconds prior to eating.
   e. Staff will wipe down peanut-free table prior to his snack/lunch time using a new clean wipe.
   f. Trained staff will actively supervise peanut-free table to enforce rules prohibiting the sharing of food.
   g. Timmy's snack/lunch bag will be kept in an area separate from other children's snack/lunch bags.
   h. Staff will prompt Timmy to drink from his own water bottle (provided from home) if he is observed drinking from the drinking fountain.

5. **Rainy Days &/or Extreme Heat Days**
   a. Timmy will have access to and be prompted to eat at a designated "peanut free" table inside the classroom.
   b. Staff will use an appropriate cleaning product to clean the indoor "peanut free" table prior to snack/ lunch time in the classroom and will clean all of the tables after snack or lunch in the classroom.

6. **Notification to School Staff and Health Education**
   a. A copy of Timmy's IUSD Individual Health Care Plan and 504 Plan will be provided to all staff who work with Timmy (including substitute teachers in advance of working with Timmy). Copies of these documents and his EpiPens will be accessible in Timmy's classroom (in a posted/labeled location) and the health office.
   b. Each year, the school nurse will train staff that work with Timmy on understanding his health concerns including symptoms of anaphylaxis and asthma, EpiPen and inhaler administration, and emergency response.
   c. Students in Timmy's class will be taught by either the school nurse or teacher about food allergies, proper hand washing and the use of hand wipes within the first 5 days of each school year.
   d. An IUSD allergy awareness letter prepared by the school nurse will be sent out within the first five days of each school year to all parents of students in Timmy's grade level regarding his anaphylactic allergy (Timmy's identity will remain confidential in the letter).
e. Parent’s will meet Timmy's new teacher prior to the start of the school year to review his Health Plan and 504 Plan.

f. School nurse will ensure access to emergency medication for Timmy when developing plans for fire drills, lockdown drills and earthquake drills.

7. Fieldtrips
   a. Parents will be allowed to attend any fieldtrip that involves food in accordance with vendor space limitations.

   b. On field trips in which students bring food, Timmy’s food will be kept separate from other student’s food, his table will be cleaned prior to eating, he will be prompted to wash his hands or to use a wipe prior to eating, and he will only eat food supplied by his parents.

8. Education
   a. Timmy will be allowed time equal to time missed to complete teacher required assignments and class projects due to health related absences &/or treatments.