



# Illinois State Board of Education

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## APPENDIX C.

### INFORMATION RECEIVED FROM CHICAGO PUBLIC SCHOOLS

Submission Type	Amount / Content
Narrative Response to each of the Four Issues	The District provided affidavits submitted by both Dr. Keenan and Mr. Gregory Volan that were responsive to each of the issues outlined in the Inquiry. Dr. Keenan responded to Issues 1, 2, and 4 and Mr. Volan responded to Issue 3.
Affidavits from the Chief of the Office of Diverse Learner Supports and Services (ODLSS), Dr. Elizabeth Keenan	The District provided affidavits submitted by Dr. Keenan that provided information including but not limited to the following topics: <ul data-bbox="727 1003 1424 1486" style="list-style-type: none"><li>• CPS Personnel and Decision-making,</li><li>• Narrative responses to Issues 1, 2 and 4 generally,</li><li>• An explanation of data submitted pertaining to related service provider minutes,</li><li>• A rebuttal to allegations and positions maintained by the Advocates which also included commitments around what CPS could do and intends to do in the future,</li><li>• An explanation of the task force that had been convened under former CEO Forrest Claypool, and a breakdown of the documents that were being provided upon request of the Inquiry Team, and</li><li>• Position vacancies.</li></ul>
Affidavits from a Senior Assistant General Counsel, Kathleen Gibbons	The District provided affidavits submitted by Ms. Kathleen Gibbons that provided information including but not limited to the following topics: meetings pertaining to the development of the SSM system, how the SSM system currently operates, guidance documents developed, procedural manuals developed, meetings held with the CTU, trainings conducted, materials at the training, and data that CPS maintains pertaining to the issues of the Inquiry.

Affidavits from the Senior Budget Manager, Gregory Volan	The District provided numerous affidavits submitted by Senior Budget Manager, Gregory Volan that included a narrative response to Issue 3 generally, and a description of the budget appeals review process.
CPS Training Materials	The District submitted power point decks and training materials for case managers and Principals in the areas of Assistive Technology, ESY, Paraprofessional support, Separate Day placement, Transportation, and the ODLSS Procedural Manual.
CPS Procedural Manuals	The District submitted procedural manuals for 2015, initial and revised, and the 2016 manuals. These documents were intended to help inform all internal and external partners, and provide guidance and explain the special education process.
CPS Guidance Documents	The District provided guidance documents from 2016, December 2017 (draft version-only), and the guidance documents from February 2018. More specifically, the documents include pages related to: Assistive Technology, Paraprofessional, Related Services, Specific Learning Disability, and Transportation.
Office of Diverse Learner Supports and Services (ODLSS) Organizational Chart	The District submitted ODLSS Organizational Charts for 2016 and 2017-2018, which outline the various divisions, and name individuals in more senior levels of management.
Affidavits from CPS Administrators	The District submitted two affidavits from CPS Administrators, one Assistant Principal and one Principal, who stated their personal knowledge and experiences with the electronic IEP system, documentation and data collection requirements placed on personnel, and policies regarding transportation.
IEP Meeting Data	The District provided the number of IEP meetings that were held through SY 15-16, SY 16-17, and SY 17-18 (up

	<p>and through February 15, 2018), with a breakdown of how many initials / annual meetings there were, how many revisions meetings there were, and how many in which there were revisions made without an additional meeting and a waiver was secured.</p> <p>The District also provided data of the number of electronic dissent forms that were submitted from SY 15-16, SY 16-17, and SY 17-18 (up and through February 16, 2018), with a breakdown of how many dissent forms were completed by CPS staff versus how many dissent forms were completed by non-CPS staff.</p>
Transportation Data	<p>The District provided data on the number of electronic IEPs with transportation services identified for the student for SY 15-16, SY 16-17, and SY 17-18 (up and through February 18, 2018), with a breakdown of how many students were transportation eligible and how many students accepted transportation services in each year.</p>
Related Service Provider Data	<p>The District provided the number of related service provider IEP minutes that were provided for the following: SY 15-16, SY 16-17, and SY 17-18 (up and through February 18, 2018), with a breakdown by related service provider, including Occupational Therapists, Physical Therapists, Nurses, Social Workers, Psychologists, and Speech and Language services. The chart also provides a breakdown of direct versus indirect minutes provided by each provider.</p> <p>The District additionally provided another chart, breaking each related service provider discipline down and identifying for SY 15-16, SY 16-17, and SY 17-18, how many total positions they had in each discipline staffed and vacant versus how many positions there were open.</p>
Paraprofessional Data	<p>The District provided the number of electronic IEPs with paraprofessional support for the following: SY 15-16, SY 16-17, and SY 17-18 (up and through February 18, 2018), with a breakdown of how many IEPs had paraprofessional support and the total amount of paraprofessional minutes in IEPs for each year.</p>

<p>SSM / Impact screenshots and generated Forms</p>	<p>The District provided hundreds of pages of screenshots of forms generated by the SSM system and specific pages of the SSM system itself, including but not limited to pages concerning Compensatory Education, LRE placement, paraprofessionals, a list of SSM documents, Help documents, SSM announcements, updates, trainings, screenshots related to transportation and related forms, and screenshots concerning ESY, AT and Augmentative Communication, accommodations and modifications.</p>
<p>SSM Change Request Process Flow Chart</p>	<p>The District provided a flowchart that highlights the compliance monitoring and management of the SSYM system when there are enhancements or configurations made. The document also provides a list of key terms to be mindful of when navigating the change request process, a step-by-step process of how changes are identified and implemented, and finally the communication for how SSM users will be notified of the changes and supported thereafter.</p>
<p>Budget Presentation by Senior Budget Manager, Gregory Volan</p>	<p>The District provided a copy of the presentation given to the Inquiry Team on February 27, 2018 regarding CPS' budgeting system that included an overview of the budgeting process, what is in a school's budget, how schools prepare their budgets, and how special education funding was allocated over the last three years. Mr. Volan also walked the Inquiry Team through a sample school's documentation at the meeting and additionally provided those documents as well after the meeting concluded.</p>
<p>Budget Review Forms</p>	<p>The District provided an example of the type of forms that are filled out by the Network Chief upon receiving a request for an appeal from one of the Chief's schools.</p>
<p>Dashboard of Appeal Decisions</p>	<p>The District provided a chart outlining when appeals were made, by what school, within what network, identifying the number of special education teachers and paraprofessionals being requested, the total amount of funding requested, the status of the review, the decision summary and the amount ultimately awarded. In addition</p>

	to these statistics, the chart also provides a breakdown of the racial demographics of the school making the request.
Appeal Decisions 2016-2017 & 2017-2018	The District provided Review and Decision Reports for each individual schools' request and the reports include an amount request, a description of the request, the Principal's justification and the Network Chief's analysis / recommendation. Sometimes the reports also include relevant data around IEP minutes, student enrollment, and current funding. The reports also include a summary of the decision with sometimes a rationale provided.
Agendas and Meetings of Appeal Committee August 2017 – February 2018	The District also provided copies of their agendas from their Budget Appeals Review Committee Meetings held between August 2017 and February 2018 of this current school year. The agendas provide a network-by-network break down of the requests being made, capture some analysis and decisions.
Principal Contract (with duties)	The District provided a template copy of what the uniform principal's performance contract looks like, which additionally outlines the term, duties of a principal within CPS, compensation, evaluation criteria, etc.
Job Descriptions for the Assistant Principal and District Representative and Case Manager Qualifications	The District provided what is available on the "Careers" page for CPS outlining a description of an Assistant Principal and District Representative's duties, and the qualifications for such positions.
Consultant Documentation	The District provided numerous documents concerning the task force that had been convened under former CEO Forrest Claypool for purposes of overseeing the development of guidelines and protocols to better identify needs and appropriate services for students with disabilities. The documents include, but were not limited to: <ul style="list-style-type: none"> <li>• Reports generated,</li> <li>• Names of consulting firms or individual consultants,</li> <li>• Engagement letters,</li> </ul>

	<ul style="list-style-type: none"> <li>• A list of CPS staff interviewed by the consultants,</li> <li>• Interview notes,</li> <li>• Documents CPS received from identified consultants related to special education,</li> <li>• Documents related to meetings convened (e.g. agendas, meeting minutes, and work streams identified), where consultants considered the eligibility of students for special education, related services, paraprofessional services, transportation and/or ESY,</li> <li>• Documents related to the implementation of recommendations generated by any report, and</li> <li>• The payment of consultants.</li> </ul>
List of District Representatives	The District provided a list of District Representations for SY 16-17 and SY 17-18, broken down by what Network they were assigned.
Training Materials	The District provided training materials / decks provided to principals in SY 16-17 around the following topics: paraprofessional justification forms, ESY, case management and training materials / decks provided to case managers in SY 17-18 on SSM changes, a school profile review, procedures for transfer students, Medicaid designee updates, agency nurse protocols and scheduling DIE/504/IEP meetings.
Transportation Documents	The District provided a table of contents, with accompanying information pertaining to help documents that were made available to case managers and district representatives on August 29, 2016, regarding IEP and 504 eligible students. The documents include an explanation of transportation services in the SSM system and forms associated with requesting transportation services for varying needs.
Position Vacancy Data	The District provided a narrative response and data for the following: SY 15-16, SY 16-17, and SY 17-18, to support the number of special education vacancies the district had, broken down by category, (including teachers, paraprofessionals and related service providers) with an

	accompanying explanation as to how services were provided in those areas.
IEP Service Minute Report SY 17-18	The District provided data for SY 17-18 on the total number of IEP minutes the District had for students with disabilities up and through February 18, 2018.
Case Study Evaluation Data	The District provided a chart breaking down of evaluations completed, eligible and not completed on time for SY 17-18, up and through February 18, 2018.  The District also provided a chart with eligible evaluations for SY 17-18 by primary disability category.
Evaluation Extension Data	The District provided a chart for SY 16-17 and SY 17-18 on the number of mutual agreements that were made to extend evaluation timelines.
Employee Roster	The District provided a copy of their employee roster as of December 31, 2017.

## INFORMATION RECEIVED FROM ADVOCATES

<b>Submission Type / Amount</b>	<b>Amount / Content</b>
Statement of Facts	The Advocates submitted a document responsive to all issues of the Inquiry, titled a “Statement of Facts.” The document explains the relevance and context of the submitted documents and further explains issues addressed in the original Open Letter submitted by the Advocates.
Parent Affidavit <sup>1</sup>	The Advocates submitted thirty-four (34) Parent affidavits. Many of these submissions contained student Individualized Education Programs (IEPs), emails to / from the district and school officials, medical documentation, reports, evaluations, and narratives of the experiences these students had within CPS and/or the experiences of the parents themselves in the process of advocating on behalf of their children.
Special Education Advocate Affidavit	The Advocates submitted eighteen (18) Advocate affidavits. Some of these submissions were by licensed attorneys representing the parent and/or guardian and student, and some affidavits were submissions by parents who also consider themselves advocates on behalf of themselves and other parents. Similarly to the Parent affidavits, some of these submissions included student records, and email communications regarding the student.
Special Education Teacher / Teacher (generally) Affidavit	The Advocates submitted fourteen (14) special education teacher / teacher affidavits. These submissions contain information about the schools these individuals worked within, interactions with the administration and/or district staff, data, and narratives about the students in their classrooms.
School Social Worker Affidavit	The Advocates submitted two (2) social worker affidavits regarding their personal experiences and those of the students they serve within CPS.

<sup>1</sup> Some individuals made submissions in the capacity of both a parent and an advocate. Those submissions have been counted towards both the total parent and total advocate submissions reflected in this chart.



School Counselors / Case Manager Affidavit	The Advocates submitted one (1) school counsel affidavit regarding their personal experiences and those of the students they serve within CPS.
School Administrator (Principal, Assistant Principal, etc.) Affidavit	The Advocates submitted two (2) administrators, both Principals, affidavits regarding their personal experiences and those of the students they serve within CPS.
School Psychologist Affidavit	The Advocates submitted one (1) school psychologist affidavit regarding their personal experiences and those of the students they serve within CPS.
Educare Early Childhood Center, Disabilities / Mental Health Manager Affidavit	The Advocates submitted one (1) affidavit.
Corey H. Monitor Affidavit	The Advocates submitted one (1) affidavit.
Physician Affidavit	The Advocates submitted two (2) physician affidavits total. One of a doctor working in school-based clinics and the other of another physician.
City Committee Hearing	The Inquiry Team listened to and reviewed the video recording of the City of Chicago Committee on Education and Child Development Meeting on January 12, 2018.
Documents / Forms related to Paraprofessional Justification	The Advocates included the entire paraprofessional justification form off the SSM, procedure notice, including paraprofessional justification, student suspected needs, data collection and current data verification forms, and data collection template.
Communications between Advocates and CPS	The Advocates included fourteen (14) communications to / from Advocates and CPS regarding concerns with the procedural manual, policies, procedures, SLD eligibility,

	MTSS data requirements, transportation, client stories, FOIAs, and settlement agreements.
Access Living Budget Review of CPS	The Advocates submitted three (3) budget reviews that were conducted by Access Living on CPS in 2016, 2017, and 2018.
Communications by the District to School Staff	The Advocates included one (1) message from former ODLSS Chief Pat Baccellieri, one (1) MTSS letter from Baccellieri,
Power Point presentations to Case Managers	The Advocates included presentations in the following areas that case managers attended. Presentations on: <ul style="list-style-type: none"> <li>• Assistive Technology (AT),</li> <li>• Multi Tiered Systems of Support (MTSS),</li> <li>• Eligibility,</li> <li>• Referral,</li> <li>• Paraprofessionals,</li> <li>• Transportation,</li> <li>• Related Services,</li> <li>• Separate Day School,</li> <li>• Specific Learning Disability (SLD), and</li> <li>• Extended School Year (ESY).</li> </ul>
Transportation Documents	The Advocates submitted the following documents related to the transportation issues they have expressed: <ul style="list-style-type: none"> <li>• OSERS Q &amp; A on Transportation,</li> <li>• CPS' Transportation Purple Form (old version),</li> <li>• Amended Bulletin No. 9 CPS Transportation,</li> <li>• Testimony to CPS re: transportation,</li> <li>• Letter to parent removing transportation,</li> <li>• Press Release by Legal Council for Health Justice re: transportation,</li> <li>• Due Process decision concerning removal of transportation services of a student with disabilities,</li> <li>• ODLSS letter re: pre-K transportation update,</li> <li>• ODLSS letter to parents re: transportation, and</li> <li>• CPS' current Blue &amp; Purple Transportation forms.</li> </ul>

<p>District Representative Review Form</p>	<p>The Advocates submitted what DRs are to review, generated by the SSM system regarding the items for which the DR’s involvement was necessary.</p>
<p>Chicago Principals and Administrators Association (CPAA) Data, Results, and Summaries</p>	<p>The Advocates submitted the following documents developed by the CPAA:</p> <ul style="list-style-type: none"> <li>• Data summaries,</li> <li>• Survey results,</li> <li>• Narratives on CPS’ delay and denial tactics for special education funding appeals,</li> <li>• Narratives and analysis on network chiefs backing or blocking special education budget appeals,</li> <li>• Appeals Process Timelines,</li> <li>• Data Sources for CPS Appeals Discrimination,</li> <li>• CPS Appeals Decisions (FOIA),</li> <li>• Comments on FOIA documents, and</li> <li>• Testimony by CPAA at Illinois House Education Committee.</li> </ul>
<p>Presentations and materials to Principals</p>	<p>The Advocates submitted the following documents developed by CPS and provided to Principals as part of trainings, and Principal Institutes:</p> <ul style="list-style-type: none"> <li>• Transportation deck,</li> <li>• SLD Eligibility procedures,</li> <li>• Paraprofessional deck,</li> <li>• ESY deck,</li> <li>• Paraprofessional approval, and</li> <li>• Paraprofessional justification form deck.</li> </ul>
<p>Office of Diverse Learner Supports and Services (ODLSS) Procedural Manuals</p>	<p>The Advocates submitted the:</p> <ul style="list-style-type: none"> <li>• ODLSS Procedural Manuals,</li> <li>• Procedure FAQ documents,</li> <li>• Final and Draft versions of procedures related to: <ul style="list-style-type: none"> <li>○ Transportation,</li> <li>○ SLD,</li> <li>○ Separate Day,</li> <li>○ Related Services,</li> <li>○ Paraprofessionals,</li> </ul> </li> </ul>

	<ul style="list-style-type: none"><li>○ AT, and</li><li>○ ESY.</li><li>● Guidelines Introduction Letter,</li><li>● SSM Guidance, and</li><li>● SSM updates.</li></ul>
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**INFORMATION RECEIVED FROM THE STATE BOARD OF EDUCATION**

<b>Submission Type</b>	<b>Amount / Content</b>
Due Process Decisions	The Inquiry Team found six (6) due process decisions involving Chicago Public Schools in 2017 and 2018 relevant to the issues being looked into by the Team.
Letters of Findings	The Inquiry Team found fourteen (14) letters of findings from state complaints involving Chicago Public Schools from 2016 through 2018 relevant to the issues being looked into by the Team.
Information from Pam Jurkoshek, Contractor for Special Education	Received information regarding CPS’s Maintenance of Efforts calculations for the last several fiscal years.
Discussions with Timothy Imler, Division Administrator for Funding & Disbursements	Regarding state and federal funding generally. More specifically, evidence based funding, CPS’ funding of special education, changes in funding and disbursements over the last three school years, CPS’ compliance with reporting requirements, and spending on IDEA-related personnel.
Discussions with Jason Hall, Division Administrator for State Funding & Forecasting	Regarding CPS’ reporting of state and federal funds, specifically general state aid and supplemental general state aid.
Discussions with Deb Vespa, Division Administrator for School Business Services	Regarding student based budgeting methodologies and a better understanding of school finance.
Discussions with Mark Schudel, Division Administrator for Special Education Administration	Regarding the indicators and focus monitoring done by ISBE on CPS based on the indicators, data in the School Report Card, and compliance with IDEA and IDEA’s reporting requirements.

Discussions with Annie Brooks, Division Supervisor for Title Grant Administration	Regarding the appropriate use of Title I funds and reporting requirements on CPS. How CPS utilizes Title I funds, and the interconnectedness of Title I with special education funds, if at all.
Discussions with Matt Ulmer, Division Administrator for Federal & State Monitoring	Regarding sources of funding between Title I and special education funds, and auditing efforts to check this.
Discussions with Heather Calomese, Executive Director of Special Education Services Division	Regarding pre-K transportation due process matter, Corey H. monitoring and requirements that CPS was under, and HSMP reports.
Discussions with Patrick Payne, Director of Strategy and Analytics	Regarding an explanation and breakdown of the CPS special education data provided to us by Sarah Karp on from 2015 – 2017, an understanding of the employee position rosters, and additional data typically maintained by CPS.
Legislative Hearing	The Inquiry Team listened to and reviewed the audio recording of the Illinois House Elementary and Secondary Education School Curriculum & Policies Committee Hearing conducted on January 19, 2018.

**INFORMATION RECEIVED FROM THIRD PARTIES**

<b>Submission Type</b>	<b>Amount / Content</b>
Office of Diverse Learner Supports and Services White Paper Analysis	This was an attachment to CPS’ response to the Advocates of an analysis done by the District to transparently reflect on student achievement gaps and the lack of progress in improving student outcomes for students with disabilities, and to outline CPS’ plan for reversing this trend, and to ultimately clarify the future vision.
Parent Affidavits	Parents submitted affidavits on behalf of themselves, their children, and other parents and students who were experiencing issues within one of the four areas outlined in the Inquiry.
Special Education Personnel Data from WBEZ Reporter, Sarah Karp	<p>WBEZ Reporter, Sarah Karp, provided, generally speaking, special education data from 2015-2017 concerning CPS. More specifically, Ms. Karp provided the following information to the Inquiry Team including, but not limited to:</p> <ul style="list-style-type: none"> <li>• Employee Position Roster March 2016;</li> <li>• Employee Position Roster March 2017;</li> <li>• IEP Minutes Per Service for SY 2015-2016;</li> <li>• IEP Minutes Per Service for SY 2016-2017;</li> <li>• Students with IEPs Eligible for ESY by Primary Disability 2013-2017;</li> <li>• Related Service Providers, by Provider Type for SY 13-17; and</li> <li>• Paraprofessionals, by Position Title for SY 13-17.</li> </ul>
Current and Former Teacher Affidavits	Submissions by special education teachers regarding and including their experiences with administration, district staff, data, and recounting narratives of their students with disabilities and concerning issues they have witnessed.
Position Analysis Review Form	Received a copy of what was then the Office of Special Education and Supports (OSES) used for submissions of position requests and in processing and tracking special education positions.

Social Worker Affidavit	Submissions of an affidavit regarding their personal experiences and those of the students they serve within CPS.
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