

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

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MIKEISHA BLACKMAN, et al.,	)	
Plaintiffs,	)	
v.	)	Civil Action No. 97-1629 (PLF)
	)	Consolidated with
DISTRICT OF COLUMBIA, et al.	)	Civil Action No. 97-2402 (PLF)
Defendants.	)	
_____	)	

**EVALUATION TEAM  
RECOMMENDATIONS  
RELATING TO THE  
INTERIM REPORT OF THE EVALUATION TEAM  
FOR THE PERIOD AUGUST 24, 2006 - JANUARY 17, 2007**

**Submitted by:**

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The Recommendations below are substantially the same as those contained in the draft Interim Report provided to the Parties, with the exception of recommendations addressing: (1) resolution sessions; (2) the development of a *Blackman/Jones* project management plan; (3) sample testing of school management of data processes; and (4) the need for the District of Columbia as well as DCPS to promote school enrollment data interface and integration within all public schools in the District, including charter schools. The Evaluation Team has met with the parties, counsel, DCPS staff, and subsequently with the Superintendent and DCPS *Blackman/Jones* project manager to obtain their response to these recommendations. The Team has summarized its understanding of the status of DCPS' response to each of the recommendations based upon these communications and subsequent follow-up confirmations provided by the DCPS General Counsel. Along with its summary of the DCPS response to the recommendation, the Evaluation Team has included comments as to significant issues not addressed in the DCPS response or that remain otherwise outstanding and requested written plans for implementation of the recommendations.

**A. *Organizational and Communications Recommendations***

**1. Leadership**

DCPS should establish a position of Chief Implementation Officer for the *Blackman/Jones* Consent Decree to be responsible for internal monitoring of all decree implementation efforts and ensuring that barriers to compliance are swiftly corrected. The current dispersal of responsibility among numerous officials involved in various aspects of the compliance effort has resulted in such a fragmentation of knowledge that no senior official of the DCPS has a comprehensive grasp of the status of implementation or of the

operational barriers that are impeding compliance. Additionally, those senior staff members who maintain an active role in *Blackman/Jones* implementation, have other significant responsibilities and time commitments which preclude their providing the continuous leadership required for oversight of this major effort. The person assigned to this position should have the authority to promptly remove systemic barriers to compliance or to call them to the attention of the Superintendent. This person should also serve as the principal liaison with the Court Monitor and the Evaluation Team.

**DCPS RESPONSE TO RECOMMENDATION:** *In response to this recommendation in the draft Interim Report, the Superintendent appointed Dr. Marla Oakes as the Blackman/Jones project manager on January 12, 2007. Lead staff members in critical DCPS departments including Human Resources, Contracts and Procurement, Finance, Budget, Facilities, Information Technology, Accountability, Office of the General Counsel, as well as the State Enforcement and Investigation Division and the Chief of Staff were also assigned as project committee members to support Dr. Oakes in her leadership of the management of Blackman/Jones compliance efforts.*

**EVALUATION TEAM COMMENT:** **These measures were important steps toward instituting a viable management and accountability plan for implementation of the *Blackman/Jones* Decree. They are nevertheless only the first steps needed. Dr. Oakes continues to handle and juggle the daily responsibilities of administration of special education while also leading the *Blackman/Jones* compliance effort. Her**

**authority and organizational capacity to address the impediments to compliance will be sorely tested in the event other needed related and supported organizational changes are not executed. As the Superintendent has stated that he will issue a reorganization plan by the end of February 2007, the Evaluation Team will be in a better position to assess the efficacy of the current project management team structure later in the school year.**

**2. Organizational Accountability and Structure Issues**

a. Senior management should intensify its guidance to principals regarding their necessary direct leadership role with respect to special education programming, IEP meetings, HOD/SA and IEP implementation, tracking of referrals for assessments, and similar functions. Principals' disengagement from special education, particularly at larger secondary schools, effectively leaves some school special education coordinators with a huge volume of cases but no authority to direct critical school personnel, such as clericals or teachers, in the performance of tasks critical to maintaining special education compliance.

b. DCPS should re-examine the allocation of responsibility and authority to school principals for special education and related services. The current fragmentation of responsibility for the management and supervision of related service providers, who are a critical component of the special education process, promotes a lack of accountability for the delivery of special education services and contributes to the problems

which lead to disputes and due process hearings. The same fragmentation also impedes timely compliance with hearing officer decisions and settlement agreements (HOD/SAs). One model for correcting this problem is to give principals administrative supervision over related service providers, while leaving professional supervision within the professional discipline.

c. DCPS should evaluate how central office special education compliance specialists' responsibility for support of school special education staff in implementing HOD/SAs and improving legal compliance can best interface with the special education management and oversight roles exercised by school principals, regional special education directors, and related service supervisors. Currently, compliance specialists are directly responsible for improving school teams' HOD/SA implementation results but often do not directly communicate with management personnel who oversee these special education or related services personnel. The Evaluation Team observed in our interviews minimal evidence of integration of the work of Compliance Specialists with that of Principals, Regional Special Education Directors, or Related Service Supervisors.

**DCPS RESPONSE TO RECOMMENDATION:** *Superintendent Janey has advised the Evaluation team that he is reviewing the DCPS organizational structure and special education functions in particular and will issue a new organization plan by the*

*end of February 2007 that addresses the organizational fragmentation and authority issues identified in the Interim Report and Recommendations.*

### **3. Case Management**

DCPS should implement an effective system of case management for students with HOD/SAs to monitor and assure the timely implementation of the required actions. For such a system to be effective, case managers must be assigned to students rather than solely to schools as there is a substantial level of movement of students between schools, between regions, and from public to charter or nonpublic schools and back. These transitions are current points of vulnerability in the system where responsibility for the implementation of outstanding HOD/SAs can be lost, with the receiving school having no knowledge of its obligations under such HOD/SAs<sup>1</sup>. Case managers must have “ownership” of students on their caseload, wherever they are served. In implementing this recommendation, DCPS should examine the patterns of movement between schools and determine whether case managers should be assigned by region or by District ward in order to limit the geographic territory within which they would work, without compromising the essential intent of this recommendation. DCPS should consider implementing this recommendation by giving priority to assigning case managers to students with multiple HOD/SAs. The potential fiscal impact of implementing this recommendation can be mitigated by hiring social workers out of the funds and positions made available to DCPS for *Blackman/Jones* compliance and by taking advantage of

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<sup>1</sup> The weaknesses in the ENCORE system, described elsewhere in this report, permit this lack of communication. Compliance Specialists, who rely upon ENCORE, may be as unaware as Special Education Coordinators that a student who has transferred to a school for which they are responsible has an outstanding HOD/SA from a previous school.

Medicaid reimbursement that is available for “service coordination” for eligible students with disabilities, which is the essential function of the case manager.

**DCPS RESPONSE TO RECOMMENDATION:** *In response to this recommendation, DCPS has indicated a general agreement to have social workers review HODs in their regions and follow the cases as long as they are in the region until they are fully implemented. If a child moves to a school that is located in another region, a social worker will hand deliver the Local Access Folder (LAF) to the receiving school and electronically transmit the folder to the regional office where the school is located for assignment to a social worker in that region. DCPS will also continue with its general tracking for special education compliance by using the building case level management system, with certified special education teachers managing the cases and special education coordinators monitoring.*

**EVALUATION TEAM COMMENT:** **The Evaluation Team requests that DCPS provide it by March 9, 2007 with a written plan for implementation of this recommendation which identifies the number of students to be covered by the case management program in each region and the proposed caseloads for the social workers assigned to the case management function.**

#### **4. Dissemination of Hearing Officer Decisions and Settlement Agreements**

DCPS needs to develop a more effective system for timely communication of the requirements of HOD/SAs to Special Education Coordinators, related service providers



and placement specialists. In interviews conducted by the Evaluation Team, we consistently heard reports of delays of one to two weeks and more before they were made aware of actions they were required to take with short deadlines. These delays contributed to missed deadlines, sometimes leading to new complaints. A system for automating the electronic distribution of HOD/SAs via e-mail to all interested parties, directly from the hearing office, should be explored. Alternatively, DCPS should explore the creation of a secure, searchable website for posting HOD/SAs as soon as they are filed, where authorized users, including Special Education Coordinators, Compliance and Disposition Specialists, Hearing Officers and others, can obtain access to such documents and track all HODs related to the same student.

**DCPS RESPONSE TO RECOMMENDATION:** *The Superintendent has made the commitment that by March 31, 2007, the Student Hearing Office will disseminate hearing officer decisions electronically to relevant staff within DCPS.*

#### **5. Efficient Use of Technology by Specialists**

Communication Compliance and Disposition Specialists report that they spend much time and effort on mundane administrative tasks due to the lack of access to fax machines, printers and copiers at schools. Some make trips to the Central Office to compete for access to these limited resources with other staff. Inexpensive fax modem hardware and software for laptop computers could eliminate much of the need for printing letters, photocopying and using office fax machines to send faxes. It would also eliminate the need for paper, toner cartridges, etc. Most importantly, it would eliminate

the need for many Special Education professionals to make unnecessary trips to Headquarters for the performance of such ongoing clerical tasks.

**DCPS RESPONSE TO RECOMMENDATION:** *DCPS has indicated inadequate school building phone line infrastructure and other competing school technology needs may impede immediate implementation of this remedy. The school district has indicated it will be prepared to respond to this Recommendation by the date of the status hearing, February 13, 2007.*

**EVALUATION TEAM COMMENT:** **The Evaluation Team requests that DCPS provide it by February 28, 2007 with a written plan for implementation of this recommendation or any alternative plan DCPS proposes to address the conditions precluding efficient work that are described in this recommendation.**

***B. Recommended Changes for Management of Special Education Compliance and Resources***

**1. Project Management Plan**

DCPS should submit to the Evaluation Team by March 9, 2007 a project management plan and schedule for achieving required *Blackman/Jones* compliance measures and implementing required activities through September 1, 2007. The Project Manager and Superintendent should review and revise as appropriate the district's current plans for use of additional resources provided by the Defendant District of Columbia to assist in implementation of this Decree. The school district does have a clear need for

additional related services and intervention personnel in certain capacities and is required to comply with ¶51 of the Consent Decree. The school system's development of an effective and appropriately crafted plan for the deployment of additional personnel and other resources to support *Blackman/Jones* compliance is an essential predicate to the use of these resources as a foundation support for change.

**EVALUATION TEAM COMMENT: DCPS has not yet had the opportunity to review and respond to this recommendation which was not contained in the draft Interim Report. In the event DCPS objects to this recommendation, DCPS should raise its objection at the status conference on February 13, 2007.**

## **2. Interim Reporting**

DCPS must initiate measures to comply with its reporting obligations under the Consent Decree and generate system-wide benchmarks on standard compliance factors. While reports may clearly not be fully reliable or accurate for the reasons discussed in the Evaluation Team Interim Report, DCPS must attempt to determine what steps must be taken to generate reports that provide data while expressly identifying data limitations or problems.

**DCPS RESPONSE TO RECOMMENDATION:** *As discussed in Section VI of the Interim Report, DCPS has initiated a variety of interim data projects with the Klemm Analysis Group as a preliminary step toward generating accurate and reliable data and*

*reports. These initial steps however will still require that DCPS engage in significant follow-up data analysis, programming, and information technology planning work.*

**3. Use of Columbus Educational Services for Assessments and Services**

DCPS should meet with Columbus Educational Services to determine and implement appropriate measures and contract modifications to ensure that Columbus related service providers are principally utilized for assessments and service provision in the immediate future, as opposed to file review.

**DCPS RESPONSE TO RECOMMENDATION:** *The Blackman/Jones Project Manager is currently in the process of reviewing the status of assessments and outstanding assessment work and services required. She has met multiple times with the Columbus project coordinator. Development of appropriate measures and contract modifications to address the issues identified in this Report will not occur until this review is complete.*

**EVALUATION TEAM COMMENT:** **Consistent with Consent Decree ¶51, the DCPS Project Manager should meet with the Monitor to discuss potential changes in the use of intervention and assessment staff and any proposed contract modifications prior to proceeding with these modifications.**

#### **4. Special Education Management Training and Procedures**

The Special Education Department should develop and deliver an organized, systematic training program and protocols for staff that address a consistent set of standards for managing: HOD/SAs, resolution meetings, assembling special education confidential folders, use of Encore and data, and other critical compliance and special education management issues.

**DCPS RESPONSE TO RECOMMENDATION:** *DCPS has indicated that it agrees with this recommendation. The school district has not provided information to date with respect to how it intends to implement the recommendation beyond reference to a new effort on the part of regional special education supervisors to support schools with serious folder disorganization issues and a focus on the functions of special education coordinators specified in their job descriptions.*

**EVALUATION TEAM COMMENT:** **The Evaluation Team requests a written report by March 30, 2007 detailing how it intends to implement recommendations B. 2, 3 and 4.**

#### **5. Nonpublic Unit Caseload and Resources**

Review of placement specialists' caseloads and required resources for efficient and effective operation of the Nonpublic Unit is needed. Columbus providers should begin provision of assessments for nonpublic students, as specified in the *Blackman/Jones* Action Plan. To ensure that the substantial backlog for this group of

students is addressed and that the subsequent backlog does not increase, DCPS should commence negotiation with nonpublic educational schools/providers regarding their provision of related service assessments to enrolled DCPS students and a standard fee schedule.

**DCPS RESPONSE TO RECOMMENDATION:** *In formalizing the reorganization of special education, Dr. Oakes and Dr. Janey will include the reorganization of the Nonpublic Unit. Dr. Janey intends to complete the reorganization by the end of February. DCPS agrees to discuss with the nonpublic schools and providers whether any of them will be capable of providing assessments. DCPS has confirmed that providers referred from the Columbus contractual arrangement will begin immediately to provide assessments for the nonpublic schools and providers, as well as charter schools in addition to DCPS schools.*

## **6. Resolution Sessions**

The Evaluation Team recognizes that there are many issues related to the availability of quality, appropriate educational and related services, management of resources, and timely fulfillment of legal obligations that play a role in the current lack of success with resolution sessions. We appreciate that addressing these underlying issues is an essential part of a strategy to make resolution sessions a more meaningful and effective tool in successfully addressing due process complaints.

a. If the IEP team or school believes that potentially legitimate issues of placement, compensatory education or other matters with significant fiscal or programmatic implications will be raised in the resolution session, the Special education Coordinator should notify an appropriate regional or central office educator so that s/he can participate in the resolution session and become fully familiar with the specific facts of the case and assist the team in making a decision that considers placement options. This individual should be delegated authority, in consultation with the Director of Compliance, to address these issues with the team at the local school in the resolution session.

b. Where local school representatives are able to address and resolve substantive educational and assessment issues at the local level, based upon their evaluation of the facts of the case, they should be encouraged to exercise their autonomy and knowledge to reach and implement immediate resolution of the case. Proper use of disposition specialists to assist schools in this mediation and resolution process should be strongly considered.

c. For the resolution sessions held at the central office, DCPS needs to address the gaps in the current process whereby persons who are knowledgeable about the student and the facts underlying the administrative due process complaint do not participate in the process as required. The individuals handling resolution sessions at the central office should be provided the same procedures

and flexibility described in paragraphs 6(a) and 6(b) above to enable their settlement of cases on substantive terms during resolution sessions.

d. To the extent that DCPS believes that its current policy -- not to pay attorneys' fees for settlements that occur at resolution sessions or prior to the due process hearing -- is generating unnecessary hearings and settlements on the record, which themselves entail additional costs to the system besides attorneys' fees, it should reconsider this policy. For local resolution sessions, it should consider authorizing principals to make a recommendation to the Director of Compliance or delegate, to approve attorneys' fees as part of a settlement reached at a resolution session. This process would reinforce the important role of the principal in the special education process, while the central office review and approval would facilitate consistent application of the policy regarding payment of attorneys' fees. For central office resolution sessions, this authority could be delegated to the two disposition specialists who attend the session, and work under the supervision of the Director of Compliance.

**EVALUATION TEAM COMMENT: DCPS has not yet had the opportunity to review and respond to these recommendations which were not contained in the draft Interim Report. The Evaluation Team requests a written response to these recommendations by March 9, 2007. In the event DCPS rejects in whole or part these recommendations, DCPS should identify in its response its proposal for**



**improvement of the resolution process and mechanisms by which the process can become a viable tool for early settlement of cases.**

***C. Recommendations Regarding Data and Reporting***

**1. Data Cleanup**

Data within the Encore data base system must be cleaned up. Once the database on special education students is deemed “clean” then DCPS should define, establish, and execute data quality control procedures regarding all data desired to be updated into the special education “clean database” in the future.

Three intermediate goals to overall special education data cleanup follow:

- Clean data related to HOD/SAs that are overdue or pending overdue.
- Clean data related to evaluations (IEPs, triennial evaluations, specific evaluations as part of IEPs or HOD/SAs).
- Clean data related to verification of students in special education in charter schools, and other DC, State and Federal agencies (such as the Child and Family Services Agency).

**DCPS RESPONSE TO RECOMMENDATION:** *DCPS has indicated it agrees with this recommendation and has initiated preliminary work for the clean-up of HOD/SA data and data related to evaluations through its work with the Klemm Analysis Group.*

**EVALUATION TEAM COMMENTS:** **This clean up work entails interim measures and requires substantial follow-through on the part of DCPS and major**

**improvement in DCPS' information technology and data analysis capacity – initiatives and commitments not addressed to date.**

**2. Interim Stop-Gap Measures for Maintaining An Operational Data Reporting System**

Certain interim stop-gap measures must be implemented to keep even the most rudimentary data reporting system available through Encore operational for purposes of compliance management and reporting. These include:

- Compliance staff must regularly update the legal module to reflect progress on specific items completed within each HOD/SA so as to permit appropriate tracking of the status of closure of cases. To avoid causing wasted time expended on specialists' data entry, programming glitches or design issues that cause data entry not "to take" must be addressed in conjunction with this requirement.
- Measures must be implemented that facilitate the Information Technology Department's weekly generation and distribution, perhaps in a spreadsheet format, of cases closed via the Closer program, and cases that remain open.
- Consultation should occur with Dr. Klemm to establish protocols for entry of new HOD/SAs and the training of any staff employed for HOD/SA data entry no later than the start of school in January 2007.

**DCPS RESPONSE TO RECOMMENDATION:** *Interim stop-gap data tracking and management measures and protocols are being initiated through the work*

*of Klemm Analysis Group. KAG also on an interim basis has assumed the responsibility for entry of data on all new HODs/SAs.*

**EVALUATION TEAM COMMENTS: This recommendation will require substantive and ongoing follow-up on the part of management and school level staff that has not been addressed to date.**

**3. Implementation of Data and Accountability Measures on Test Basis**

To assist the school district and parties in understanding and managing data and organizational accountability issues for purposes of improving *Blackman/Jones* compliance, three schools (an elementary, junior and senior high school) should be selected as test cases for early review of the actual impact of the introduction of interim data management processes.

**DCPS RESPONSE TO RECOMMENDATION:** *Although this remedy approach was discussed with school district staff on January 19, 2007 when it was proposed by Plaintiffs, DCPS has not formally responded to this proposal.*

**EVALUATION TEAM COMMENT: The Evaluation Team requests that DCPS identify by March 9, 2007 the schools that will be used for this test review and the protocols, measures, and time frame that will be used as a basis of the review, to begin no later than March 30, 2007. In the event DCPS rejects in whole or part**

**these recommendations, DCPS should raise these objections at the status conference on February 13, 2007.**

**4. Establish an Office of Analysis and Reporting within DCPS**

The Chief of the Office of Analysis and Reporting should be a person who understands the need for quality data and consistent, accurate reporting, and should report directly to the *Blackman/Jones* Project Manager. This individual should coordinate frequently with the Chief Information Officer.

This office should be accountable for standards of data within all databases established within DCPS for in-house, state and Federal reporting. Individuals from this office should coordinate with appropriate counterparts in other agencies of the DC government and/or Federal programs that require periodic reports.

This office should be responsible for training individuals charged with entering data and using systems so they can effectively prepare reports that are useful to the diverse users. Each individual entering data should, however, report to the principal at their school. Engagement of the school staff in the development of the systems and analytic procedures is critical for their engagement in what otherwise has been seen as a nuisance.

This office should perform audits of the data entered by each individual and provide performance evaluations for maintenance of that task as part of their workload.

**DCPS RESPONSE TO RECOMMENDATION:** *DCPS has indicated that Dr. Janey and Dr. Oakes will address this recommendation through the overall reorganization of special education by the end of February 2007.*

## **5. Update Encore or Select Another Database System**

In order to meet the needs of DCPS special education professionals and all reporting requirements (Federal, state, Consent Decree, etc.) and to respond to all issues identified in Section IIB of the Interim Report, DCPS needs to update Encore or select another database system.

The Evaluation Team is aware that DCPS currently only holds a maintenance contract with Encore, and that DCPS anticipates completing an RFP for a “new” IT contract. Prior to finalizing the RFP package, the Evaluation Team strongly suggests that DCPS survey all Encore users and potential users about their concerns with Encore and desires for a special education database system so that the subsequent system (either an update to Encore or something else) actually has a chance to meet the needs of special education professionals. Without this critical step, DCPS will only replicate the same pitfalls of the current Encore installation.

Included in the update or new system requirements should be two added features that are not currently included in Encore: information on dispute resolutions (and their scheduling); and, information on hearing office docketing, scheduling, HOD/SA date of issuance, with tracking tickler systems for both features.

The update or new system must include the ability to track events in a manner that allows for meeting the requirements of the Consent Decree, as well as standard

requirements of quality control, flexibility, user communication and reporting demanded by DCPS Special Education and discussed in this Report. If another vendor is selected, it is critical the DCPS continue to run Encore in parallel until the new system has been alpha tested, beta tested, and run for a number of months as if the only system used for tracking and reporting.

The update or new system should utilize a data cleanup process and updated data entry procedures established in response to the data cleanup recommendation as well as all issues identified Section IIB of the Interim Report.

**DCPS RESPONSE TO RECOMMENDATION:** *DCPS Chief Information Officer has scheduled a meeting with DCPS information technology staff with Rebecca Klemm for later in February 2007 on this and related topics. No commitments have been made to date.*

**EVALUATION TEAM COMMENT:** **The Evaluation Team requests a written report by March 30, 2007 regarding the implementation of each of the recommendations in the above Section B.**

**6. Data Interface / Integration Recommendation for the District of Columbia**

Children in special education move from public schools to charter schools and back with some regularity. However, there are currently no effective systems for tracking such movements and ensuring that the Special Education database, Encore, and the regular education database, STARS, accurately reflect the current school of attendance;

for ensuring that schools to which students are transferred are aware of their obligations under outstanding HOD/SAs; for timely transfer of student folders between such schools; or for communicating the status of services that have been provided or assessments performed by the school from which the student is being transferred. Achieving compliance with the *Blackman/Jones* Consent Decree will require charter schools to maintain data about special education students in a format compatible with the DCPS data system and to communicate on an ongoing basis with DCPS schools. It will also require DCPS to engage in ongoing communication with charter schools and to develop processes and procedures for regularly receiving and uploading such data from charter schools into its system in order to track and ensure accountability for the implementation of HOD/SAs. We believe this is an area in which leadership from the Mayor's office could play an essential role in bringing together key representatives of charter schools, the chartering authorities and DCPS to address these critical foundation problems. In the absence of such integrated data tracking efforts and communication, students all too frequently become lost in the maze of DC's educational bureaucracy and the lack of any form of accountability for charter schools. Additionally, the District of Columbia should consider whether it may be able to recruit on a pro bono or reduced fee basis, technology consultants who might work with these various entities in developing or adapting integrated data systems. A detailed response to this recommendation should be provided by March 30, 2007.

**D. *Hearing Office Recommendations***

**1. Management of Transitions in the Student Hearing Office**

Any transitions in operation of the Student Hearing Office, including a transition in hearing officers, must be managed in such a manner to address outstanding issues affecting efficient, professional, and fair operation of the Student Hearing Office, consistent with the provisions of the Consent Decree (¶53-55) as well as the ongoing requirement to meet *Blackman* timeline compliance standards.

**DCPS RESPONSE TO RECOMMENDATION:** *DCPS has indicated that new hearing officers are in the process of being retained, a process that should be complete by March 1, 2007. The current hearing officers' contracts are being extended on a month to month basis until the new hearing officers are appointed. No further information regarding the management of this transition has been made available.*

**2. New Docketing System**

An assessment should be performed as soon as possible with the assistance of the Chief Information Officer (or his designee) and Dr. Klemm as to whether Encore can support the consolidated docket tracking requirements and needs of the Hearing Office and Consent Decree specifications. If not, the Chief Information Officer should assign appropriately trained staff or consultants to evaluate and prepare a suitable, efficient docketing and tracking program for the Student Hearing Office. The Monitor and Dr. Klemm should be consulted prior to DCPS proceeding with any new docketing system. An interim docketing system should be in place by May 1, 2007.



**DCPS RESPONSE TO RECOMMENDATION:** *No response has been provided as of this date.*

**3. Suitable Professional Office and Hearing Room Arrangements**

By March 15, 2007, DCPS should make available sufficient and suitable space to enable each hearing officer to have a hearing room, adequate workspace, and sufficient storage space for secure storage of confidential files.

**DCPS RESPONSE TO RECOMMENDATION:** *The Superintendent has made the commitment that the Student Hearing Office will be relocated and provided with suitable professional offices, file storage facilities, and hearing rooms. However, the date by which this will be accomplished is not currently known.*