



Shifting the Tide

Exploring Centralization of Services for
Students with Disabilities in New Orleans



The Center for
Learner Equity

Mission

We are committed to catalyzing student success and eradicating the complex, pervasive, and systematic barriers that prevent students with disabilities from accessing quality educational opportunities and choices, robust support, and inclusive environments.



The Center for Learner Equity is a nonprofit organization dedicated to ensuring that students with disabilities have equitable access to a high-quality public education. CLE provides research, policy analysis, coalition building, and technical assistance to a variety of stakeholders across the nation.

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OUR APPROACH IN NEW ORLEANS

We interviewed
34 SCHOOL STAKEHOLDERS

.....
41% CEO | 59% SPECIAL EDUCATION LEADERS
.....

representing
55 SCHOOLS

.....
76% OF ALL CHARTER SCHOOLS
AUTHORIZED BY ORLEANS PARISH SCHOOL BOARD
.....

operated by
**23 CHARTER MANAGEMENT
ORGANIZATIONS**

.....
83% LARGE CMOs | 83% SMALL CMOs | 54% SINGLE-SITES
.....

Across the totality of interviews, stakeholders articulated persistent challenges with the current state of special education program implementation across the school system.

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Read the executive summary of this report at
[www.centerforlearnerequity.org/top-10-resources/
shifting-the-tide-exploring-centralization-of-
services-for-students-with-disabilities-in-new-orleans/](http://www.centerforlearnerequity.org/top-10-resources/shifting-the-tide-exploring-centralization-of-services-for-students-with-disabilities-in-new-orleans/)



Introduction

IN RESPONSE to [persistent challenges](#) associated with ensuring that New Orleans students with disabilities can access high-quality supports and services across the city's uniquely decentralized all-charter system, the Center for Learner Equity (CLE) sought to understand the root causes of these challenges and surface viable structural solutions. Specifically, CLE examined the feasibility of centralizing aspects of special education¹ through the creation of an *Educational Service Agency*.² If the New Orleans charter sector is going to fulfill its promise to elevate the lives of students across the city, it must address these

persistent opportunity gaps experienced by students with disabilities, a gap that nationally disproportionately impacts black boys.³

The critical question posed by this study is whether the New Orleans school system should consider centralizing aspects of special education. To succinctly answer that question: a supermajority of school stakeholders interviewed (73%) agreed that centralizing aspects of special education would improve their ability to meet the needs of their students with disabilities. Stakeholders were clear about the potential benefits of centralization and the services and programs to

“ As a CEO but also as a parent, [ensuring] that the quality of the programming across the city exists, so that any student with any level of disability has a high-quality option. CEO, SMALL CMO

consider centralizing. Given the documented challenges, centralization is an opportunity to directly impact students and remedy systemic inequities. This report details a path forward for the centralization of special education programming to occur through an Educational Service Agency nested within NOLA Public Schools.

First, we will briefly summarize the scope of the interviewee pool that informs the totality of our findings. We will also narrate a high-level summary of stakeholders' perceptions on the current state of special education program implementation, which illustrate the systemic challenges we explore solving through centralization (Part I). Then, we present our recommendations and findings on the core issue: the feasibility of creating an entity to centralize aspects of special education, including who should host it and what must be true for the system's autonomous charter schools to consider participating (Part II). Applying these findings, we consider centralization through an *Educational Service Agency*, hosted by NOLA Public Schools (Part III). We conclude with



several appendices that detail our exhaustive findings on the current state of special education program implementation (Appendix A), and a detailed methodology of our interview process and the scope of our interviewee pool (Appendix B).

A Path Forward for Special Education Programming in NOLA Public Schools

This report outlines the centralization of special education programming to occur through an Educational Service Agency nested within NOLA Public Schools.

Centralization could include ...

- » **Citywide special education records database to ease student transfers within the city**
- » **Library of assistive technology devices and equipment**
- » **Centralized Medicaid billing**
- » **Related services providers for:**
 - speech
 - physical therapy
 - occupational therapy
 - meeting the needs of students who are Hearing Impaired, Deaf, or Deaf-Blind, like Teachers for Visual Impairment, American Sign Language (ASL) interpreters, and orientation and mobility services
 - students identified as Gifted/Talented
- » **Formalized network of specialized programming, hosted by partner schools, addressing the needs of:**
 - students with low-incidence disabilities, including deafness, blindness, deaf-blindness, and medically fragile, for whom there are complex and specialized needs around transportation, toileting, and nursing needs
 - students with autism
 - students' behavioral health needs
- » **Access to:**
 - assessments required during the evaluation process, like vision and hearing screenings or a bilingual education diagnostician
 - busing and transportation
 - professional development for special education staff
 - common forms
 - legal support

Centralization should not disrupt existing ...

- » **Charter LEA status, and the funding arrangements that flow from LEA status**
- » **Charter autonomy over decision-making**
 - Whether to participate in the ESA
 - Individualized Education Program (IEP) team decision-making
 - Staffing
 - Scheduling



PART I

A diversity of local voices informs our findings, and they collectively speak to persistent challenges hindering quality educational options for New Orleans students with disabilities

TO UNDERSTAND the current system's challenges and examine the feasibility of centralization, CLE conducted in-depth interviews with school stakeholders and families of students with disabilities currently enrolled in New Orleans' uniquely decentralized system of over 70 autonomous Local Education Agency (LEA) charter schools.⁴

Across the totality of interviews, stakeholders articulated persistent challenges with the current state of special education program

implementation across the school system. We learned that school stakeholders strongly correlated their perceived difficulty or ease of special education program implementation with their charter management organization's (CMO) relative size, and in many instances, referenced the system's decentralized nature as the source of their various capacity challenges.

School stakeholders across a diversity of CMOs reported they were struggling to secure

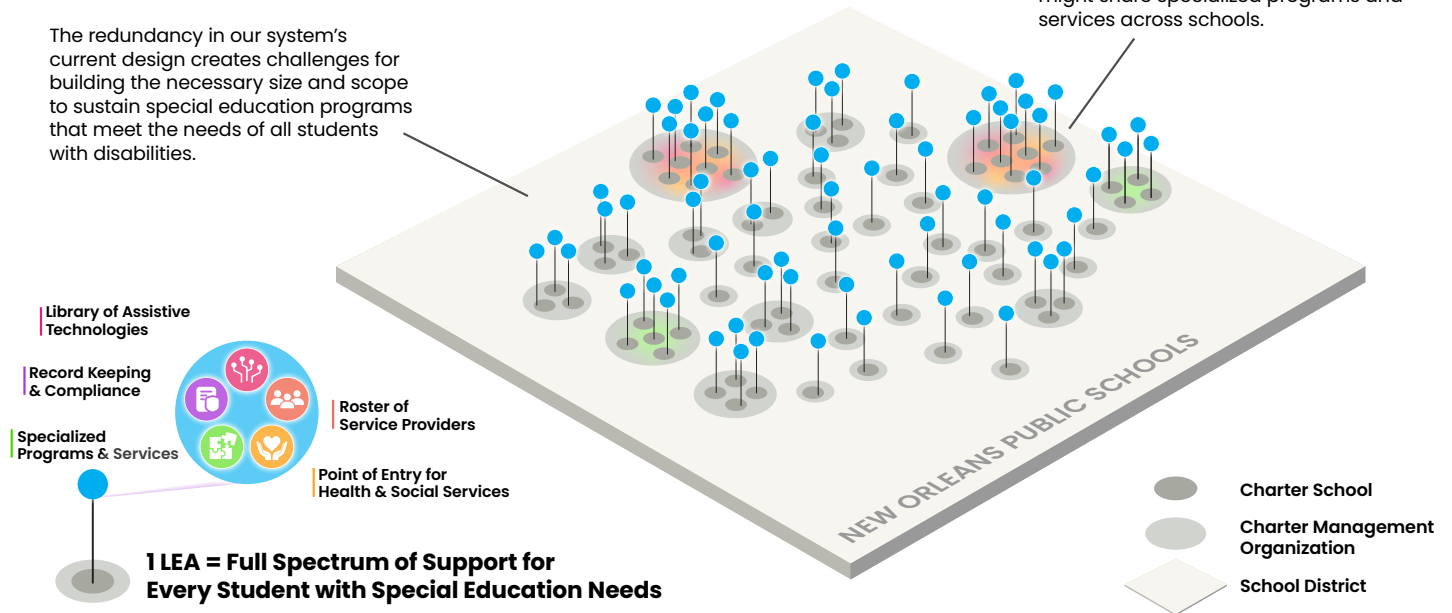
New Orleans has a decentralized system that is siloed and inefficient in educating students with disabilities.

Current State | Special Education Infrastructure

Each NOLA charter school operates as its own local education agency (LEA), and is required to meet the needs of any student with a disability who enrolls. Currently, every school must maintain access to the full spectrum of support.

Some larger CMOs take advantage of scale by sharing service providers and assistive technologies, while others might share specialized programs and services across schools.

The redundancy in our system's current design creates challenges for building the necessary size and scope to sustain special education programs that meet the needs of all students with disabilities.



*New Orleans Public Schools = 72 charter schools in 36 Charter Management Organizations (CMOs) in the 2022–23 school year

the necessary staff to effectively implement special education programs and services, with access to qualified special educators and related service providers cited as particular challenges. Interviewed families also spoke about service provider shortages and the negative impact on their children.

School stakeholders explained the ways in which they were struggling to access the full continuum of placements to meet the needs of all students with disabilities. Particular emphasis was placed on programs and services to educate students with more significant needs at the deeper ends of the service continuum (“specialized programming”).

Lastly, interviewed families of students with disabilities articulated feeling ignored trying to navigate the decentralized school system and ensure their children’s needs were met. They felt that the system lacked sufficient structure for getting information and support, and that schools did not have high expectations for what their children could achieve. For

more details on stakeholders’ perceptions about the current state of special education programming, please visit Appendix A.

Our interview pool of school stakeholders reflects 76% of public charter schools authorized by the Orleans Parish School Board (OPSB). The school stakeholder interview pool represents a deep and diverse array of charter management organizations (CMOs): 83% of Large CMOs, 83% of Small CMOs, and 54% of Single-site schools.⁵ The interview pool of school stakeholders is comprised of both Chief Executive Officers (CEOs) (41% of stakeholders) and CMO network-level Special Education Leaders (59%).

Additionally, CLE partnered with Families Helping Families NOLA, a nonprofit family advocacy organization, to host three virtual focus group sessions for families of students with disabilities, reaching 12 parents. For more information on the scope and breadth of the stakeholder interview process, please see Appendix B.



PART II

Centralization is a means to improve programming and services for New Orleans students with disabilities

IN THIS SECTION, we will detail our findings around school stakeholders' beliefs that centralization is a means to improve programming and services for New Orleans students with disabilities, and stakeholders' stance on what must be guaranteed and planned for if centralization proceeds. 73% of school stakeholders interviewed agreed that centralizing special education would improve their ability to meet the needs of their students with disabilities. Stakeholders were clear about the potential benefits of centralization and the services and programs to consider centralizing (sub-section I). When it comes to *who* should host centralization of special education, stakeholders largely supported a public entity, and many

were cautiously open to that public entity being NOLA Public Schools (sub-section II).

However, NOLA Public Schools centralizing special education programming is also fraught and complicated for leaders within this system of autonomous LEA charter schools. School stakeholders voiced a range of concerns that generally fell into four themes ("barriers"). Amongst the totality of interview data, we identified corresponding solutions that could counteract each of the four barriers. Some solutions emerged from stakeholders communicating similar ideas, while other solutions were explicitly proposed in the interview protocol for stakeholders to react to as a component of a centralization entity (sub-section III).

73% of school stakeholders interviewed agreed that centralizing special education would improve their ability to meet the needs of their students with disabilities.



SECTION I

New Orleans school stakeholders feel centralization improves their ability to meet the needs of students with disabilities, citing systemic benefits and coalescing around programming and services to centralize

WE ASKED if a proposal to centralize special education sounded like something that would improve schools' abilities to meet the needs of their students with disabilities. 73% of all stakeholders agreed it did.

Amongst those who were undecided, the indecision was communicated equally as reasons for it (access to services) and reasons against (not wanting to give up decision-making autonomy). In those scenarios, they needed to know more details.

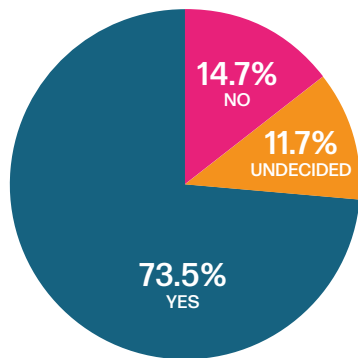
Comparing favorability amongst CEOs compared to Special Education Leaders, CEOs were slightly less supportive (71%) than Special

Education Leaders (80%). When we illustrate the importance of autonomy to New Orleans charter leaders below, it contextualizes the gap.

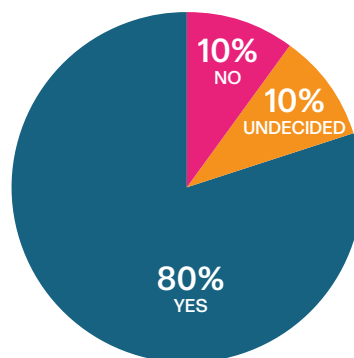
When we compare favorability across CMO peer groups, Large CMOs were less favorable of centralization than the other peer groups. As evidenced by our findings below on current perceptions of special education program implementation, Large CMOs were more likely to correlate their size with their perceived capacity to implement special education, and ergo, their perception that they did not need centralization.

STAKEHOLDER APPROVAL OF CENTRALIZATION

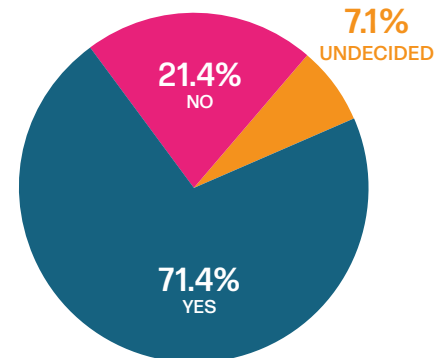
73% of all stakeholders believe centralizing special education improves schools' ability to meet students' needs, with 80% of Special Education Leaders and 71% of CEOs supporting this initiative



ALL STAKEHOLDERS

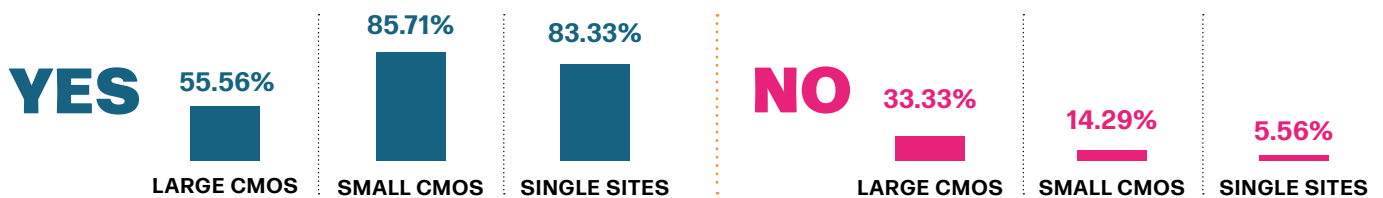


SPECIAL EDUCATION LEADERS



CHIEF EXECUTIVE OFFICERS

CENTRALIZATION FAVORABILITY BASED ON CMO PEER GROUP



11% of Large CMOs and 11% of Single-sites recorded no answer.

Potential benefits of centralization

Across the totality of interview data on the ways in which centralization would improve schools' ability to meet the needs of students with disabilities, many of the cited benefits involved improved equity of access, services,

and opportunities across the diversity of New Orleans schools. The potential benefits associated with centralization touched on the following themes:

An opportunity to directly impact students and remedy systemic inequities:

"The most significant factor [that informs my opinion on centralizing special education] is the most vulnerable kids and families, and inequity and making sure everybody as close to humanly possible is getting equitable services."

SPECIAL EDUCATION LEADER, SINGLE-SITE

"As a CEO but also as a parent, [ensuring] that the quality of the programming across the city exists, so that any student with any level of disability has a high-quality option." CEO, SMALL CMO

For the system to better leverage limited staff expertise and improve efficiencies in citywide coordination of the continuum of placements, especially specialized programming:

"I'd like to see New Orleans become more centralized in terms of best practices for special education. There's one, maybe two people in the whole city who can provide [certain] services, and they just don't have the bandwidth for us." CEO, SINGLE-SITE

"When you're out on your own, it just comes down to the people that are in the individual schools. And if you don't have the right people leading, it could

be devastatingly bad. [Centralization could mean] having a place to go to get the answers and the help."

SPECIAL EDUCATION LEADER, SMALL CMO

"I think if [centralization] is about increasing the specialization of programs, and getting more money for specialized programs, I think that would definitely have a positive impact on kids in schools." CEO, SMALL CMO

To provide a citywide talent pipeline and consistent professional development for special educators:

"We need teacher expertise and training. If we had access to an expert who could help us stand that up in a way that they could provide the expertise to train the people [that would be helpful]." CEO, SMALL CMO

"[The most significant factor that informs my opinion on centralization is the] shortage of human capital. We just need more people." SPECIAL EDUCATION LEADER, SINGLE-SITE



To improve access to and lower the costs of related services:

“Definitely speech-language pathologists, occupational therapists, physical therapists, adaptive PE providers, school psychologists, training and support of staff, a learning and professional growth perspective would be hugely beneficial.” [CEO, SINGLE-SITE](#)

“There’s all kinds of pieces that I do think that a district and centralization would be able to provide that we’re not able to provide ... things like ... access to occupational therapy or physical therapy through centralized contracts.”

[SPECIAL EDUCATION LEADER, SMALL CMO](#)

To improve the quality of services:

“[The most significant factor that informs my opinion on centralizing] is quality and affordability; if there could be a good balance between the two.” [CEO, SMALL CMO](#)

“[The most significant factor that informs my opinion on centralizing] is a lot of

schools have to do a lot of things. And because they’re trying to do a lot of things, they’re doing nothing exceptionally well. And so having a centralized group allows schools to like, really hone in and [pursue] high quality.”

[SPECIAL EDUCATION LEADER, LARGE CMO](#)

Notably, some stakeholders explicitly did not see any benefits of centralization, and were opposed to the concept. These stakeholders doubted the feasibility of successful implementation or that any potential benefits would justify changing the status quo; they were also suspicious of centralization marking a return to pre-Katrina dysfunction.

“I have strong reservations about anybody’s ability to execute it in a successful way that meets the needs of kids.” [CEO, SINGLE-SITE](#)

“I don’t see the benefits ... I’m willing to listen, but I struggle to see what those would be... I don’t have faith in NOLA Public Schools. They struggle as an authorizer and the folks in our buildings know a little bit more about special ed law and responsibilities than the people at NOLA Public Schools.” [CEO, LARGE CMO](#)

“I get why as a community, we’re at this point where we’re like, ‘oh, let’s centralize. Remember, it was easier when it was centralized, right?’ But what we’re forgetting is that part of the reason we decentralized everything is because we were super frustrated and unhappy. I understand the theoretical reason for it, and I do think that it could save money. What I’m interested in is what it could do programmatically. But in terms of control over quality, I’m not sure that a bureaucracy is the way to go.” [CEO, SMALL CMO](#)



My school had to buy a \$7,000 Rifkin chair this year. What happens when that kid withdraws and mom puts him in a different school next year? Do they have to buy everything [again]? Or could we send [the Rifkin chair] to OPSB and then the chair can be checked out by the other school?

SPECIAL EDUCATION LEADER, SINGLE-SITE

Potential services and programs to centralize

When stakeholders were asked to share if they thought centralization would benefit students, they were also asked to specify who and what. Stakeholders cited a broad range of student profiles, services, and programming areas.⁶

Related services providers for:

- speech
- physical therapy
- occupational therapy
- meeting the needs of students who are Deaf, Blind, or Deaf-Blind, like Teachers for Visual Impairment, American Sign Language (ASL) interpreters, and orientation and mobility services
- students identified as Gifted/Talented

Specialized programming for:

- students with low-incidence disabilities, including deafness, blindness, deaf-blindness, and medically fragile, for whom there are complex and specialized needs around transportation, toileting, and nursing needs
- students with autism
- students' behavioral health needs

Access to:

- nursing services for medically fragile children
- assessments required during the evaluation process, like vision and hearing screenings or a bilingual education diagnostician
- busing and transportation
- professional development for special education staff
- common forms
- legal support
- assistive technology and specialized equipment.





SECTION II

NOLA Public Schools as the host for centralization of special education programming

IN INTERVIEWS, we first examined whether stakeholders believed the entity that centralizes special education should be public or private. Across the totality of responses, stakeholders were more supportive of it being a public entity than a private entity. Multiple stakeholders pointed to the transparency and accountability guaranteed within a public entity; they were also jaded on the sustainability of a private entity, referencing the legacy of shuttered non-profit cooperatives and support organizations in the school system's post-Katrina evolution.

"I feel more comfortable with it being a public entity knowing how that works, and that there is more accountability on the public entity side versus the non-public entity." CEO, SINGLE-SITE

"I'd say from experience that private organizations take a lot of money from our schools. So I'd prefer it to be public."
SPECIAL EDUCATION LEADER, SINGLE-SITE

"I love the idea of a co-op, but was on multiple iterations of the co-op. So I'm naturally suspicious of that because it just hasn't been long-lasting and I feel like a lot of the stability has to come from the district." SPECIAL EDUCATION LEADER, SMALL CMO

Alternatively, amongst the stakeholders that preferred a private non-profit organization, no one had a clear local entity in mind that they thought was well-positioned to do this.

Then, we proposed NOLA Public Schools as one public entity that could host centralization and asked school stakeholders to react. For some, NOLA Public Schools was the natural answer - stakeholders in this group tended to be from Single-site CMOs, and either previously or currently opting into NOLA Public Schools' LEA.⁷ Some of these stakeholders immediately assumed centralization meant NOLA Public Schools, and communicated this assumption early in the interview process. These stakeholders' opinions were informed by their lived experiences and interactions rather than a particular philosophy on the matter.

Some stakeholders expressed skepticism about NOLA Public Schools' current readiness to lead alongside their philosophy that NOLA Public Schools was still the natural entity. They rationalized that because NOLA Public Schools is the existing citywide public education entity, it was the logical place for centralization to live and offered built-in stability and accountability.

Even amongst the most vocally opposed to NOLA Public Schools hosting it, there was resignation that there probably wasn't a better option.

"NOLA PS [has] been very responsive and very helpful in terms of when we didn't have clarity. They also know the NOLA context. There was collaboration across schools." CEO, SINGLE-SITE

"I've had an incredible and positive experience in working with the [Exceptional Children's Services] department at NOLA Public Schools. I don't have any concerns that would make me feel hesitant to do that. They may have a staffing problem with it. And if too many people are accessing different types of services, I'd be worried that they wouldn't be able to serve everyone who needed something. There needs to be a runway." CEO, SMALL CMO

"I'm inclined to say [NOLA Public Schools] because they would have more intrinsic accountability within the governmental sense. They at least have a pool of people to begin with that have knowledge about things. And you don't want to be starting from scratch with so-called consultants." SPECIAL EDUCATION LEADER, SMALL CMO

"I ultimately believe very strongly that there is a role [for NOLA Public Schools] to play... Most of the stuff we've centralized is stuff related to equity: enrollment, expulsion, truancy ... in theory, this seems like something to do. I just continue to need more understanding of how." CEO, LARGE CMO



SECTION III

Stakeholders cite legitimate concerns with NOLA Public Schools hosting centralization, but there is a path forward for NOLA Public Schools to lead if explicit conditions are met

The concerns fell into four main themes (barriers):

1. Charter autonomy
2. Authorizer role and oversight dissatisfaction
3. Staffing and readiness issues
4. Lack of trust

SCHOOL STAKEHOLDERS voiced a range of concerns about NOLA Public Schools hosting centralization of special education services, and those concerns generally fell into four themes (“barriers”): concerns about charter autonomy; the conflict posed by centralization with NOLA Public Schools’ authorizer responsibilities and dissatisfaction with existing oversight mechanisms; NOLA Public Schools’ lack of staffing and readiness; and a lack of trust between schools and NOLA Public Schools. Across rich and nuanced discussions of these barriers to centralization, we surfaced

eight corresponding solutions that could mitigate these barriers, ranging from guaranteed components of a centralization entity to necessary preconditions to launch centralization. These solutions emerged from stakeholders communicating similar ideas, as well as ideas explicitly proposed in the interview protocol for stakeholders to react to as a component of a centralization entity. We will brief each of the four barriers and present the corresponding solutions.

School stakeholders are unwilling to sacrifice autonomy for centralization. NOLA Public Schools should guarantee charter autonomy over decision-making and provide options for engagement to respect charter schools' existing autonomy.

New Orleans charter schools, and the CMOs that operate them, currently hold expansive autonomy in their legal designation as *Local Education Agencies*. Stakeholders perceived that centralization of special education came at the expense of their charter autonomy, and had real concerns about what they might lose if centralization happened.⁸ CEO stakeholders were concerned about losing any autonomy while still retaining full accountability.

“With autonomy comes more accountability. But you can’t have it both ways. So to give up the autonomy, you need to be able to push some of that accountability off to the district. And so the district can’t have it both ways. That needs to be very clear.” CEO, SINGLE-SITE

“I like the power and the responsibility together... what I would be giving up is the power, and yet I’d still have the responsibility as the LEA. And that just seems untenable to me.” CEO, LARGE CMO

If NOLA Public Schools creates a centralization entity, it should offer two guarantees: to respect existing autonomy in charter LEA status and to respect existing funding arrangements that flow from charter LEA status.

Stakeholders voiced their concerns about the loss of autonomy by explaining why autonomy mattered so much to them. Stakeholders shared that autonomy enabled them to be flexible, responsive, and adaptive to meet the needs of their students with disabilities - that they made better decisions about how to meet students’ needs because they were closest to the students.

“We believe that decisions should be made closest to kids. I like that we have the responsibility and also the power to craft IEPs the way we think they should be crafted. If anything goes wrong in special ed, it’s on us.” CEO, LARGE CMO

“We really love our Single-site identity. We really cherish the autonomy that we have, and the ability to be flexible and adaptable to meet the needs of the kids who are in front of us.” CEO, SINGLE-SITE

SOLUTION: GUARANTEE CHARTER AUTONOMY

The first solution we surface is the need for a centralization entity to respect existing charter autonomy. If NOLA Public Schools creates a centralization entity, it should offer two guarantees: to respect existing autonomy in charter LEA status and to respect existing funding arrangements that flow from charter LEA status. Guarantees to preserve these two things protect *charter autonomy over decision making* - which ranges from IEP team decisions, building scheduling decisions, and staffing decisions - all aspects of autonomy

we heard cited as sacred in stakeholder interviews.

CEOs noted their openness to thoughtfully negotiating the line between centralization and autonomy for their schools. In the design process of a centralization entity, CEOs wanted to understand exactly what their schools stood to gain and evaluate how it might increase their capacity to implement special education programming.

“Autonomy is super valuable to us. But it also feels like a liability. We’re really interested in exploring some type of collaboration between other small schools in terms of combining back office functions, just to make sure that we have more capacity to detail and handle just purely the compliance stuff. The actual programming can have the energy that it needs to function well.” CEO, SINGLE-SITE

“I think that most of the charters ... want choice. If they feel like something is being taken away from them, they push back, even if that’s something that they really need. But if they feel like you have the option to use this, they’re going to use it all because we need it all.” SPECIAL EDUCATION LEADER, SMALL CMO

SOLUTION: OFFER MULTIPLE OPTIONS FOR ENGAGEMENT

During interviews, we floated the idea of charter schools having multiple options for engagement with centralization. 73% of school stakeholders supported centralization with multiple options for engagement and a la carte services. Support amongst CEOs is overwhelmingly favorable (85%). This

reinforces the importance of charter autonomy to choose their level of engagement with centralization of special education programming; there are no “one-size-fits-all” solutions for stakeholders.

The types of services to consider offering *a la carte* are narrated above in subsection I.

Stakeholders felt centralization of special education at NOLA Public Schools conflicted with its authorizer function and voiced dissatisfaction with existing oversight. NOLA Public Schools could mitigate these concerns with a firewall between authorizer and centralization and utilizing centralization to codify expectations and streamline supports.

Some stakeholders opposed NOLA Public Schools hosting centralization of special education programming because of its existing role as charter authorizer. They felt it was a conflict of interest for NOLA Public Schools to act as both authorizer and centralized provider of special education programming. For some, they were interested in centralization, but they could not reconcile it happening at NOLA Public Schools.

“I am staunchly against it. I’d have a really hard time with NOLA Public Schools providing my special education services and then trying to tell me that there was something wrong with them.” CEO, SINGLE-SITE

“NOLA Public Schools is also the authorizer. Having it be an entity separate from your authorizer, separate from NOLA PS, I definitely think is more appealing to me and I believe it would be much more appealing to my board.” CEO, SINGLE-SITE

Relatedly, stakeholders had grievances with existing lines of oversight for special education, in place in part due to an ongoing federal consent decree for systemic special education violations.⁹ Currently, New Orleans charter schools answer to multiple oversight bodies: NOLA Public Schools as charter authorizer, the Louisiana Department of Education for routine IDEA monitoring, and court-appointed independent monitors pursuant to the federal

There are no “one-size-fits-all” solutions for stakeholders.

73% of school stakeholders supported centralization with multiple options for engagement and *a la carte* services.

consent decree. Stakeholders cited incidents in which these oversight bodies produced conflicting findings and recommendations, and these grievances were complicating stakeholders' feelings on NOLA Public Schools leading centralization.

“The only real frustrating thing about our relationship with the district is that we don’t feel like we know the audit process, or what they’re looking

for in this particular year. I want to make sure that we have clarity around expectations and what both sides are going to be held accountable to.”

SPECIAL EDUCATION LEADER, SINGLE-SITE

“Current environment, everything feels like a gotcha. If doing [centralization] means opening up my files to the district, I’m out.” CEO, LARGE CMO

Amongst Special Education Leaders interviewed, many were frustrated by the lack of support and guidance from NOLA Public Schools to help them be prepared for special education oversight events. They wanted NOLA Public Schools to norm expectations and standards for compliance in special education programming for all charter schools in their portfolio.

SOLUTION: ADOPT EXPLICIT BOUNDARIES AND TRANSPARENCY AROUND THE INTERSECTION OF AUTHORIZER AND CENTRALIZATION FUNCTIONS

If NOLA Public Schools hosts a centralization entity, it should adopt explicit boundaries and transparency around the intersection with its authorizer function (i.e., a “firewall”). The interview protocol proposed a firewall as a possible component of centralization and asked stakeholders to weigh its significance - 49% of stakeholders interviewed ranked a firewall as important or critical if NOLA Public Schools centralized special education services.¹⁰

For most of the 23% of stakeholders who felt a firewall had no impact on their willingness to explore centralizing special education at NOLA Public Schools, they reasoned that an absolute firewall would prevent any dialogue between authorizer and centralization staff, creating new challenges and perpetuating current dysfunctions.

If NOLA Public Schools hosts a centralization entity, it should adopt explicit boundaries and transparency around the intersection with its authorizer function (i.e., a “firewall”).

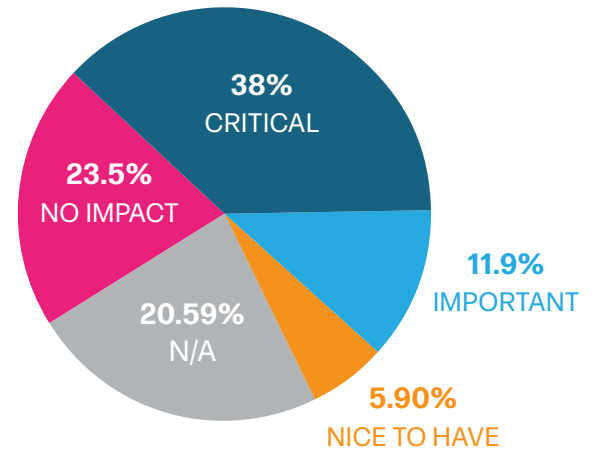
“There has to be alignment on expectations and some norms on how we comply with the law, and how we provide services. There’s too many examples and too many iterations of service models in our one city alone. There would have to be an agreed-upon authority for what the answer was because otherwise, I don’t see a centralization effort ever getting together and being productive.” SPECIAL EDUCATION LEADER, SMALL CMO

“[A firewall is] [c]ritical, because what if you call and ask for help getting physical therapy because you couldn’t find it for six months, and then they turn around and tell accountability you haven’t had physical therapy for six months.

SPECIAL EDUCATION LEADER, SMALL CMO

IMPORTANCE OF CREATING A FIREWALL ON WILLINGNESS TO EXPLORE CENTRALIZATION

49% of stakeholders ranked a firewall as important or critical for centralizing special education services at NOLA Public Schools. A few stakeholders ranked the firewall as "no impact" because they doubted NOLA Public Schools would honor it.



"They need to talk to each other ... If those two bodies are not talking to each other, we're just creating now a fourth entity that works to meet their vision of excellence." CEO, SINGLE-SITE

"I would be super frustrated, if I was NOLA PS, and there was a firewall and my special ed people knew there was a problem, but I couldn't get that information. And then I authorize a school. And then obviously, everyone's like, 'What the hell is wrong with you? ... your own people were standing there.'" CEO, SMALL CMO

"I almost feel like maybe the accountability office does need to play a role. Right now, accountability and support are disjointed. Support doesn't align with accountability... I feel like there does need to be some checks and balances and some sort of partnership."

SPECIAL EDUCATION LEADER, LARGE CMO

However, a few ranked it as having "no impact" because they didn't believe a firewall would be honored by NOLA Public Schools (a tacit connection with the *lack of trust* barrier discussed below).

Stakeholders offered their thoughts on the contours of an effective firewall. Its details should be negotiated with stakeholders. It

should ensure distinct and separate supervision and management of each function. There should be levels of centralization support and technical assistance that are always shielded from the authorizer staff, escalating to defined reasons why the centralization entity would communicate or share information with authorizer staff.

"We need meaningful sustained resources or opportunities. It would be great to have resources for [schools] to back up the fact that we're doing things correctly in the right way, not just audit us and say you get a gold star. That sort of support system, with very clear detail about what would be offered, how it would be offered, and what it's going to cost us." SPECIAL EDUCATION LEADER, SMALL CMO



SOLUTION: A CENTRALIZATION ENTITY WITHIN NOLA PUBLIC SCHOOLS PRESENTS OPPORTUNITIES TO CODIFY EXPECTATIONS AND SUPPORTS

As narrated above, school stakeholders experience a gap in NOLA Public Schools leadership around consistent expectations and support with oversight events. Centralization of special education programming within NOLA Public Schools creates the policy context in which codification of expectations and support mechanisms is possible. For instance, stakeholders cited the need for citywide norms and shared expectations for implementing various aspects of special education programming, including around conducting compliant evaluations to developing robust IEPs. Stakeholders also desired a centralized support body to help them with the nuances of special education program implementation, including support with handling external entities that have monitoring and oversight powers over the schools.

“[The most important factor that informs my opinion on centralization is] the need to have more involvement among schools ourselves. [It would be nice] [i]f all the branches can come back to the tree, and learn how to co-exist. Because we’re all trying to speak this language that helps all of our students, and we all have a good way of doing it. But we don’t know what each other is saying.”

SPECIAL EDUCATION LEADER, SINGLE-SITE

Stakeholders pointed to NOLA Public Schools' current lack of staffing and readiness to launch centralization as a barrier to their success. They should demonstrate concrete evidence of sufficient staffing before launching.

If NOLA Public Schools is going to launch an entity to centralize special education programming, its success is predicated on evidence of sufficient and qualified staffing and sound operations before launch.

Across the totality of interviews, stakeholders cited concerns about the current staffing levels and expertise at NOLA Public Schools to launch centralized special education programming.

Stakeholders opined that NOLA Public Schools staff lacked appropriate expertise, as demonstrated by disputes that arose through the authorization and renewal process. These deeply held beliefs hindered stakeholders' faith in NOLA Public Schools' ability to lead centralization.

"They do our special ed compliance audits [and] every single time we have to teach them fundamental aspects of what is actually required in special ed." CEO, LARGE CMO

"They sent people into buildings to do accountability audits who don't know

about special ed. I don't know how, capacity-wise, they would manage anything else without largely expanding their team. The accountability team, the student support team, those folks are already stretched in a million different directions and struggling to respond to emails." CEO, SINGLE-SITE

For a few stakeholders who had previously opted in (and then out) of the NOLA Public Schools' LEA, negative experiences with the district's LEA option informed their concerns about NOLA Public Schools' staffing and capacity.

"They couldn't provide reimbursements of our finances in a reasonable period of time, and we couldn't get the service providers that they were required to provide us We couldn't get the evaluations done in a fast way. A substantial portion of the evaluations that they did had to be redone when we became our own LEA." CEO, SINGLE-SITE

"The amount of time it took somebody to come in and do the observations we needed for evaluations was such a long period of time that we only got a handful done every year." CEO, SINGLE-SITE

SOLUTION: AS A PREREQUISITE TO LAUNCHING CENTRALIZATION, NOLA PUBLIC SCHOOLS MUST DEMONSTRATE EVIDENCE OF SUFFICIENT AND QUALIFIED STAFFING AND OPERATIONS TO IMPLEMENT WHAT IS PROMISED

If NOLA Public Schools is going to launch an entity to centralize special education programming, its success is predicated on evidence of sufficient and qualified staffing and sound operations before launch. Specifically, stakeholders wanted knowledgeable, experienced leadership at the helm of the entity. Their expertise should be both

in special education programming and contextual to the unique New Orleans school system. Additionally, stakeholders wanted to see a detailed staffing plan and staff *bona fides*. While many stakeholders were clearly harboring skepticism and concerns, many were also clear about what must be validated in order to get on board.

“We need to see a staffing model. What does accountability look like? Timing and schedules are important. Do they have subs, occupational therapists, or ABA therapists? Are there back-ups?” CEO, SINGLE-SITE

“The people who are involved need to definitely know the ins and outs of New Orleans and special education as it has existed in the past and as they want it to go in

the future. They need to have a clear connection to the community to know what it’s like in the different neighborhoods, what trauma looks like in the city, and how that’s affecting our kids.” SPECIAL EDUCATION LEADER, SINGLE-SITE

“What are the skill sets of the trainers, the service providers, the resources available to us, the amount of resources, the professional development around training?” SPECIAL EDUCATION LEADER, LARGE CMO

There is both an institutionalized and relational lack of trust between stakeholders and NOLA Public Schools. To address institutional distrust, NOLA Public Schools should create a Charter School Governing Board to oversee a centralization entity. To improve relational trust, NOLA Public Schools should collaboratively co-design the entity with charter schools.

For many stakeholders, the biggest barrier was simply a lack of *trust*. In this unique ecosystem, trust (or the lack thereof) was informed through two lenses. First, stakeholders’ lack of trust with NOLA Public Schools was *institutionalized*, rooted in their opposing interests in the charter authorization and oversight process, sentiments which are detailed above. Second, stakeholders’ lack of trust was also *relational*, referencing interactions where they felt NOLA Public Schools demonstrated insufficient leadership:

“The level of dialogue between the district and school leaders feels insufficient and inappropriate right now. There is a need for more collective planning. The last superintendent’s tenure basically neglected its duty to do any portfolio management. It just was not paying attention to how many students [with disabilities] were there in the district.” CEO, SINGLE-SITE

“[It’s] never felt like a team. There was no transparency and trust of actually doing work together.” SPECIAL EDUCATION LEADER, LARGE CMO

“Is NOLA PS actually going to engage and give feedback? There’s a lot of trust that would have to be built up so that it wasn’t ... a waste of time.” SPECIAL EDUCATION LEADER, SMALL CMO

During interviews, 65% of stakeholders ranked a charter school governing board as important or critical to their willingness to explore centralizing special education at NOLA Public Schools.

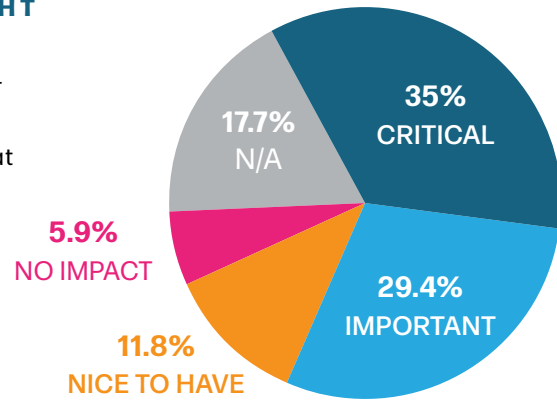
SOLUTION: CREATE A CHARTER SCHOOL GOVERNING BOARD TO OVERSEE AND DIRECT CENTRALIZATION OF SPECIAL EDUCATION PROGRAMMING

Charter schools and NOLA Public Schools will always exist in institutionalized tension given their opposing roles and interests in charter school governance. Creating a Charter School Governing Board that oversees and

directs NOLA Public Schools’ centralization of special education is a structural solution to this dilemma. CLE tested the concept of a charter school governing board during interviews and 65% of stakeholders ranked it as

IMPORTANCE OF A GOVERNING BOARD OF CHARTER SCHOOL MEMBERS FOR OVERSIGHT

65% of stakeholders ranked a Charter School Governing Board that oversees and directs NOLA Public Schools' centralization of special education as important or critical to their willingness to explore centralizing special education at NOLA Public Schools.



important or critical to their willingness to explore centralizing special education at NOLA Public Schools.

For some, it was essential to their willingness to consider NOLA Public Schools' leadership of a centralization entity because it balanced the power between NOLA Public Schools and the charter schools. Responding to a question to rank the significance of a charter school governing board to their willingness to explore centralization, stakeholders observed the following:

"[It's] [r]evolutionary. That would probably give me a little bit more optimism about this." CEO, LARGE CMO

"That would help it to feel less district-driven, and feel more like a collaborative effort. Making sure you preserve your voice is really important in this conglomerate kind of thing."

SPECIAL EDUCATION LEADER, LARGE CMO

For others, a charter school governing board represented a means of ensuring quality and responsiveness, ensuring that decisions were made closest to those impacted.

"I think it's pretty rare that the Governing Boards of places are informed by people who are actually in the schools. If this organization is providing direct services, the people who receive them should be the ones overseeing it."

SPECIAL EDUCATION LEADER, SINGLE-SITE

"In the absence of [this governing board], it's hard to imagine ... we have any real change happening. We've struggled when it's people who are not in schools or haven't been in schools for a decade or more that are handing down decisions." CEO, SINGLE-SITE

Some stakeholders offered their ideas for how the charter school governing board should be structured. They wanted to see it have explicit oversight and feedback functions, active responsibilities, the power to make decisions and influence the direction of the entity, and to be comprised of a diversity of charter schools.

SOLUTION: NOLA PUBLIC SCHOOLS MUST LEAD A DESIGN PROCESS THAT IS INCLUSIVE, COLLABORATIVE, AND CREATES CLARITY AROUND THE ENTITY'S SCOPE AND IMPACT

NOLA Public Schools can begin to repair trust with school stakeholders by demonstrating leadership in building a centralization entity. Their leadership should be inclusive and collaborative with charter schools, and the design process must create clarity around the entity's scope and impact. The process of building a centralization entity is an opportunity for NOLA Public Schools to demonstrate leadership, and doing so in an inclusive and collaborative way is necessary to gain the trust of skeptical schools.

"I want to hear from the board [and] leadership that it's a priority. I want to hear from Dr. Williams, Dr. Fulmore, and the board, 'This is a priority. This is why we did this.' And if we don't hear that then I'm like, let's do our own thing." CEO, LARGE CMO

"I would have to see them as genuinely giving us a pathway to more involvement, and not just saying, 'Hey, we're knocking on your door, only at this one time a year.'"

SPECIAL EDUCATION LEADER, SINGLE-SITE

Some stakeholders offered ideas for the design process, like piloting the entity on a smaller scale, seating a steering committee comprised of special education directors or families, and prioritizing the voices of community members. Others raised questions or topics that would need to be addressed.

- How is the entity funded? What are the costs or financial implications for schools?
- What services will be offered? What is the cost of those services?
- What is the direct impact on CMOs? What are they giving up and what are they getting?
- Who are the providers? How do they get hired and recruited? Who coaches and manages them?
- How is the entity held accountable? How is the entity staffed and operated?
- What are the engagement options for CMOs? Are there elements of centralization that are optional versus mandatory?
- If centralization is optional, what if no one uses it? What is the scale for sustainability?
- If the centralization entity takes over specialized programming, what's the jurisdictional impact on student enrollment?
- What are the terms and conditions of a Memorandum of Understanding to join the entity?

Additionally, stakeholders repeatedly emphasized the importance of quality in the entity's implementation. Heeding this advice will contribute to a design process that is transparent, inclusive, and collaborative.

The process of building a centralization entity is an opportunity for NOLA Public Schools to demonstrate leadership, and doing so in an inclusive and collaborative way is necessary to gain the trust of skeptical schools.

"How effective will this truly be for the entire city of New Orleans?... It has to be a game changer for those students and for those families. We need to do a better job with working with the families, we need to do a better job with the outcomes... All the details need to be examined. If it's centralized, and we do all of this work, it really has to be worth it." CEO, SINGLE-SITE



PART III

Centralization through an Educational Service Agency

An ESA for New Orleans mitigates tension with charter autonomy because its creation doesn't disrupt existing charter LEA status.

AN EDUCATIONAL SERVICE AGENCY (ESA) is a feasible mechanism by which NOLA Public Schools can host centralization of aspects of special education programming¹¹ and honor the school boundaries articulated above in Part 2. An Educational Service Agency¹² is an attractive option to meet stakeholders' needs in this local context: it is a regional public multi-service agency authorized by state statute to develop, manage, and

provide services or programs on behalf of LEAs in a defined region, with the transparency and accountability that attach to any public body. For more detailed information about ESAs and promising examples in the field, please see CLE's companion publication, "Educational Service Agencies: Public Infrastructure to Solve Charter Schools' Special Education Capacity Challenges."

Proposed Future State | Educational Services Agency

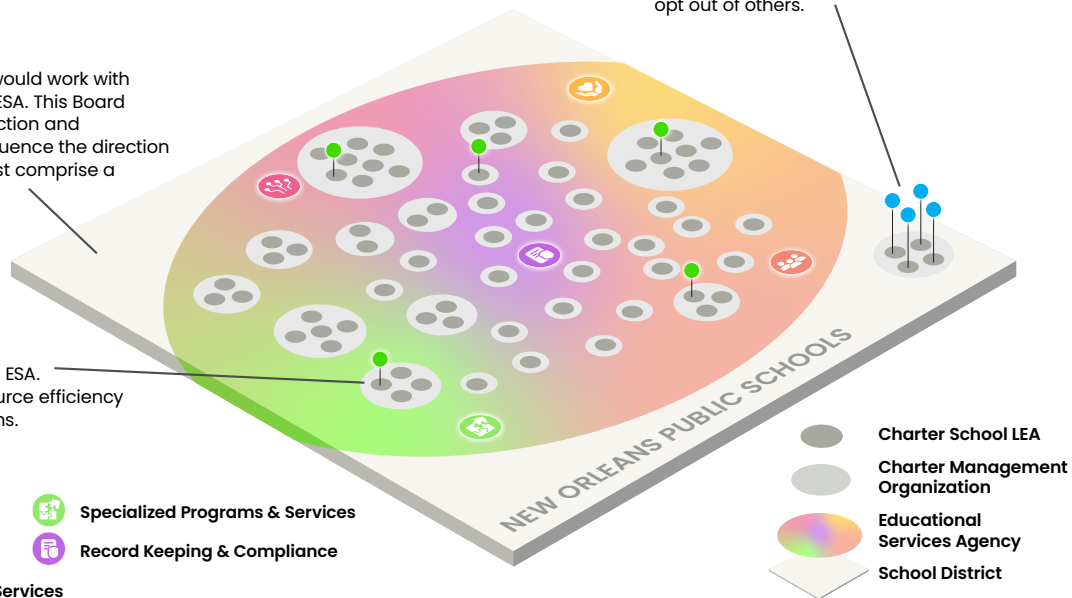
With an ESA, schools can coordinate the spectrum of special education programs, services, and related infrastructure—most of which can be jointly shared, with each school deciding how they want to participate.

Each charter retains LEA status, fulfilling individual responsibilities through the collective ESA.

Some CMOs may **choose not to participate** in the ESA, and can retain their current structures. Other schools may choose to buy into only some of the available services, and opt out of others.

A **Charter School Governing Board** would work with NOLA Public Schools to manage the ESA. This Board should have an explicit oversight function and the power to make decisions and influence the direction of the centralization entity, and it must comprise a diversity of charter schools.

Schools may operate **specialized programs as outposts**, accessible to other schools and guaranteed by the ESA. This shared approach improves resource efficiency and increased availability of programs.



*New Orleans Public Schools = 72 charter schools in 36 Charter Management Organizations (CMOs) in the 2022–23 school year

A better future: what's possible with an Educational Service Agency

An ESA for New Orleans mitigates *tension with charter autonomy* because its creation doesn't disrupt existing charter LEA status. As an intermediate level of public education infrastructure, it exists between the state education agency (SEA) and LEAs. An ESA can offer multiple service options, and charter schools can retain their decision-making autonomy over how much they wish to engage with it. This ability to centralize without disrupting LEA status fundamentally distinguishes it from the school system's current option to designate LEA status to NOLA Public Schools.

An ESA creates an additional layer of public education infrastructure, which creates opportunities to bring *coherency amongst the current lines of oversight*. For instance, an ESA could standardize expectations around elements of practice that stretch beyond

the existing jurisdiction of the authorizer's compliance and oversight functions. At this moment, navigating eight years of federal court oversight, an Education Service Agency presents an opportunity for the school system to own long-term solutions to long-documented problems, sending a strong message to external entities that the system is serious about improving outcomes for students with disabilities.

As a public entity anchored in state statute, an ESA should include a Governing Board with enumerated powers, comprised of charter schools who reflect its constituents. A defining feature of Educational Service Agencies is their statutorily empowered governing boards seated by the LEAs who utilize them, with authority to appoint its leadership and provide oversight and direction on its operations.

“ I would really like not just for [centralization] to be something that we talk about and brainstorm, but something that actually starts happening. It’s a huge need. I would say in just the New Orleans area, that we aren’t able to really give students what they need, we have to give them what we have. And it’s frustrating for families, it’s frustrating for staff because nobody wants to not give kids what they need... Like, there has to be a better way. ” SPECIAL EDUCATION LEADER, SMALL CMO

“ There’s an orientation that everybody on the team needs to have - us as charters, district, all personnel, that like this is really critical for us to figure out for kids. Leave your judgment, leave your past experiences, and let’s try to create something. I’d be happy about that. ” CEO, LARGE CMO


After eight years of federal court oversight, an Education Service Agency offers the school system a chance to own long-term solutions to persistent issues, showing commitment to improving outcomes for students with disabilities.

Charter schools can and should directly shape the level of staffing, services, and programming they wish to centralize within an Educational Service Agency. Based on the totality of stakeholder feedback, options include:

- Unified special education records database to ease student transfers within the city;
- Centralized contracts or in-house staff for major related services needs. The chance to command better economies of scale on par with neighboring parishes could draw talent back to the city; alternatively, a single point of entry for providers promises a more coherent and stable partnership opportunity for higher education or other sectors.
- Formalized network of specialized programs, hosted by partnering schools, addressing areas of identified need. Through a single point of entry and localized costs born by all and maintained within the public system, it offers a more transparent and sustainable path.
- Access to unified professional development and greater purchasing power to secure high-quality training opportunities
- Library of assistive technology



- Coordinated, citywide transportation as an IEP service
- Centralized Medicaid billing

There is a path forward for NOLA Public Schools to centralize special education programming by creating an Educational Service Agency. It’s time to change the trajectory of education for students with disabilities. Together, New Orleans educators and leaders can confront the complex, pervasive, and systemic barriers that prevent students with disabilities from learning and thriving. 

Appendices

Stakeholder Perceptions of Current Special Education Program Implementation

Overview & Summary¹³

WE ASKED CEOs (n=14) and Special Education Leaders (n=20) their perceptions of special education programming and implementation as it functioned in the currently decentralized system. During our interviews with families of students with disabilities (n=12), we explored two topics: their experience navigating the uniquely decentralized school system; and their experience with or perception of the challenges identified by school stakeholders. In presenting our findings, in some places, we disaggregate

school stakeholder data by their role (CEO or Special Education Leader), their CMO peer group (Large, Small, or Single-site), or the intersection of both.

First, we present the three core themes that emerged from school stakeholders' perceptions about the current state of special education program implementation; where family voice directly overlapped, we integrate those perspectives. Second, we summarize the themes that emerged from families' perspectives on the current state of special education.

School stakeholders correlated CMO size with ease of special education program implementation.

Across the totality of our interviews, school stakeholders frequently correlated their CMO's size and relative economies of scale to their ease of providing various aspects of special education programming. For instance, school stakeholders referenced their enrollment of a sufficient number of students with similar need profiles or their relative purchasing power to bring services or programs in-house and allocate cost across the network as critical components that informed their rationale about the relative ease of some aspect of special education program implementation.

Representatives of Large CMOs reflected that their special education capacity correlated with their size:

"I think we're at a good place with a good feel for what related service provider caseloads and possibilities are, and how we can efficiently share things across the network. We know how big the team needs to be and the different types of roles that need to be in there... It's predictable cost because it's just a salary." CEO, LARGE CMO

"We're big enough to have centralized a bunch of stuff within ourselves." CEO, LARGE CMO

In contrast, Small and Single-site CMOs felt their size hindered their capacity. Stakeholders in these peer groups expressed frustration about excessive spending on special education programmatic needs relative to the number of students who needed those services. They spoke to a constant tension over their budgetary limits and how to most efficiently access necessary staff - they couldn't afford to bring staff in-house if they couldn't spread those costs across multiple sites, but external contractors were sometimes too expensive as well.

"We are way over-spending what we should around our special education programming ... by like, over \$500,000. [My financial consultant said] this isn't really going to be sustainable ... and you need to start thinking about outsourcing more, and not having a full time [staff] ... When we were two sites and we were sharing some of those people across schools, I would say that it was much more cost-effective than what we're experiencing now." CEO, SINGLE-SITE

"A challenge is just being a small LEA. Staffing is such a challenge, not just because we can't find the right folks, but because we might only

have two kids who need a certain thing, but we still need a full-time teacher to do that thing. And it becomes really expensive... The other challenge we have is around related services... last year we had two students who needed [physical therapy but] ... now we only have one. It has just been impossible to find a physical therapist to come out and service one student for an hour a week.” [SPECIAL EDUCATION LEADER, SINGLE-SITE](#)

Some pointed to the decentralized nature of the city’s school system itself as a major cause of collective capacity challenges.

“We’re at a space where we can be a lot of things to a lot of kids, but we can’t be absolutely everything that everybody needs. People need to step up and be the experts in some of these areas. And there may be one expert in the city on certain things. And you know, there may be 10 kids that need that expert, but instead, we have the 10 kids spread all over.” [CEO, SMALL CMO](#)

“I moved to New Orleans nine years ago and I’m consistently sad and a little bit gobsmacked at what a penalty kids pay here for not having a centralized district.” [SPECIAL EDUCATION LEADER, SINGLE-SITE](#)

Reflecting on NOLA public schools’ optional LEA

PER STATE STATUTE, by default New Orleans charter schools are legally designated as their own Local Educational Agencies (LEA) for purposes of special education. However, New Orleans charter schools have the option, in their sole discretion, to designate their LEA status back to the Orleans Parish School Board (NOLA Public Schools). In the 2022-2023 school year, five charter schools (less than 7%) opted to do this.¹⁴ Because this is the sole existing centralization option for special education programming, we sought to understand school stakeholders’ perspectives on it. We learned that 30% of our school stakeholder pool had previously or was currently utilizing the LEA option. For those currently opting in, they were happy and satisfied.

We explored why designating LEA status to NOLA Public Schools was not an attractive solution for stakeholders who were communicating critical challenges with marshaling the necessary staffing and resources for special education program implementation. We surfaced two key themes.

First, stakeholders did not feel that the current LEA option was worth the money in exchange for what was provided - they felt they could do it more efficiently on their own.

“It made sense [for us] in the early years as a start-up school. It allowed for resources, guidance, and advice as a growing organization. As the school grew into a ‘fully grown’ organization, with all the pieces as far as administration and oversight, it made sense to leave.” [CEO, SINGLE-SITE](#)

“[We] opted out because of money. It was a higher percentage [and] we could use the money in a much better way.”

[SPECIAL EDUCATION LEADER, SINGLE-SITE](#)

Second, charter schools were loath to sacrifice the autonomy that comes with their LEA status; it is an integral component of their educational philosophy. When meeting the needs of their students with disabilities, stakeholders felt autonomy enabled them to be flexible, responsive, and adaptive - that they made better decisions about how to meet students’ needs because they were closest to the students.

“I just think that decision-making belongs as close to students as possible. I think that is a core tenet of charter schools.”

[SPECIAL EDUCATION LEADER, LARGE CMO](#)

Our exploration revealed cognitive dissonance between stakeholders rejecting the current centralization option because, as one stakeholder noted, “every administration [felt], ‘we could do this,’” with this report’s findings that narrate all the ways in which schools are saying that they can’t, in fact, “do this.” It emphasizes how non-negotiable autonomy and choice are to New Orleans charter schools, and that the current LEA option does not sufficiently provide that autonomy and choice to schools to be an attractive solution for most.

Stakeholders struggle to secure the necessary staff to implement special education programs and services.

Stakeholders were asked to share their perspectives on their access to qualified staff across a range of positions: special educators, related services providers, pupil appraisal staff and evaluators, and paraprofessionals. Stakeholders reported that they were struggling to secure the necessary staff to implement all aspects of special education programming for students with disabilities, with pupil appraisal and evaluation staff as the lone exception. Notably, despite Large CMO stakeholders strongly correlating their network size with improved economies of scale to coordinate programming and services, the staffing struggles detailed below were noted by stakeholders across CMO peer groups.

Stakeholders consistently pointed to common causes for the city's special education talent pipeline crisis. First, they felt COVID-19 dramatically worsened existing staffing pipelines.

“Post-pandemic, it has been pretty difficult. We are just challenged in finding a person, much less someone who’s a good fit for the program.” SPECIAL EDUCATION LEADER, SMALL CMO

“I think some of the biggest challenges right now exist in staffing. Generally, we’re still really struggling to be fully staffed at all times. And even with the staff that we do have, there’s very low numbers of actually special education certified, especially special education trained individuals who are applying and currently seem to exist in the city with experience...” SPECIAL EDUCATION LEADER, LARGE CMO

Second, stakeholders noted intense competition amongst the city's schools and an environment where demand was greater than the supply of talent.

“Special ed case manager candidates go in two piles: very passionate people committed to staying in public ed, and it’s very competitive to secure them, they end up with multiple

offers across the city... But the other pile is semi-experienced people who look qualified on paper and need an extreme amount of training to actually be really good at the job.” SPECIAL EDUCATION LEADER, SINGLE-SITE SCHOOL

“We’ve lost some of our best folks who’ve decided to go to another school or another charter organization because of higher pay.” CEO, SINGLE-SITE SCHOOL

Third, for non-educator staff who could work in the health or private sectors, school stakeholders felt they couldn't compete with the salaries and stability offered in those sectors.

“We can find providers if we’re willing to pay more for them as contractors, and they work for someone else, and not directly us.” CEO, SINGLE-SITE

“I think that a lot of people got out of providing school-based services because ... t]here was a job that was very consistent previously in big districts, and now they could go to a hospital and provide it and get paid significantly more. I think the benefits that exist in a charter school ... are really geared towards alternative certification, short-term teachers... We lost a lot of professionals.” SPECIAL EDUCATION LEADER, SMALL CMO

Talent pipeline crisis for special educators

We asked Special Education Leaders (n=20) their opinion on recruiting and hiring qualified special educators, and the majority (75%) rated it some level of difficult.¹⁵

For the 20% of stakeholders who felt it was easy, they attributed it to strong teacher retention through the pandemic and not having to contend with the current shortages. We heard this from school stakeholders across the spectrum of peer groups (Large, Small, and Single-site), suggesting that a network's

staff retention rates don't necessarily correlate with network size.

Critical shortage of qualified related service providers

We also asked stakeholders to rate their experience with securing qualified related service providers, and a majority (68%) of respondents rated this some level of difficult. Specifically, 41% of respondents considered it challenging, 26% considered it moderately difficult, and only 18% found it easy.

“If this were any other year, I'd say, ‘so easy.’ But it has been the most challenging year - over a year, really - to find folks.” *SPECIAL ED LEADER, LARGE CMO*

“An organization we're working with [for] different contractors, they can't find any-one... and it's frustrating because we don't ever want to not provide students with services. And like, we just can't do it if we don't have the people to do it.” *CEO, SINGLE-SITE*

When disaggregated by CMO peer group, surprising and distinct trends emerge - stakeholders from Large and Small CMOs rank access to needed related service providers as “challenging” at far greater rates than Single-sites.

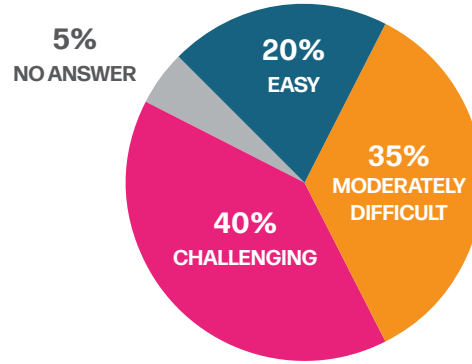
Some of the Single-sites who ranked it easy attributed the ease to using NOLA Public Schools as their LEA.¹⁶ Specifically, when one Special Education Leader at a Single-site that opted into the NOLA PS LEA was asked if there had been any related service needs for which they've struggled to secure a provider, they answered, “Nope, not a one.”

Stakeholders pointed to a critical shortage of physical therapists, speech language pathologists, and occupational therapists.

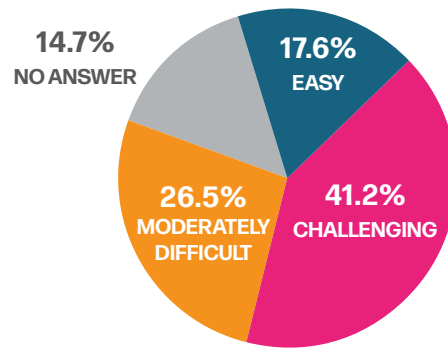
“I can't seem to hire enough of [speech pathologists] through outsourced providers and [I] still pay through the nose.” *CEO, LARGE CMO*

“We are now doing teletherapy for speech, which is not ideal, but it was truly the

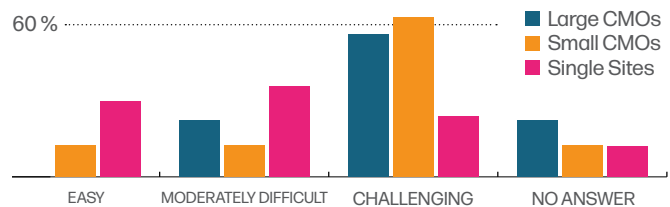
RECRUITING AND HIRING SPECIAL EDUCATORS



SECURING QUALIFIED RELATED SERVICE PROVIDERS



ACCESS TO NEEDED SERVICE PROVIDERS BY CMO PEER GROUP



only option... Speech is wild. I don't know what's going on. I'm like, 'where is everybody?'" *SPECIAL EDUCATION LEADER, LARGE CMO*

“With occupational and physical therapists recently, it's been incredibly challenging, because there's such a competition for so few people.” *SPECIAL EDUCATION LEADER, SMALL CMO*

“We have trouble with contracting folks - we have to contract for everything. We can’t find a physical therapist.” SPECIAL EDUCATION LEADER, SINGLE-SITE

In direct contrast to stakeholder perception that increased CMO size correlated with improved capacity for special education, Large CMOs are not spared in the critical shortage of related services personnel. Specifically, Large CMO stakeholders made up 60% of the stakeholders who cited speech as a “hard to find” service, along with physical therapy as another top-cited need.

Multiple families reached in our focus groups complained about the lack of speech-language pathologists amongst other types of services that their children should have received, but didn’t, for extended periods of time. In fact, 66% of focus group participants said their children had not gotten the services written into their IEPs.

“My child was telling me ‘Oh, I don’t have speech, mom. I don’t go to speech [any] more.’ And I’m like, What is going on? [and] I called the principal ... for three weeks to find out what was going on. It took them all the way from August to January to [find a speech provider].”

“The school got the funding, but they weren’t providing the services because they didn’t have somebody on staff and they didn’t notify us.”

We asked families to explain the impact that not getting related services had on their children.

“He had been making some real strides but after going so long without these particular [occupational therapy] services, we definitely saw the regression there and ended up having to go back to private services, all the while still advocating and trying to push to get the services through the school.”

“With my child, he started doing well academically, but what keeps him from being completely independent in the class and not requiring so much assistance is the lack of [occupational...

... therapy]. He just struggled so much with writing. He can verbally give you the answers.... but in order for him to be able to not require so much assistance with test taking or activities in class, he just needs more [occupational therapy], to be able to work through some of these issues with his fine motor skills. For him, it’s been a decrease in independence.”

“[After not getting speech,] she’s backtracked, regressed, and has developed a stutter.”

“My son started to regress as far as speech and more so with his behaviors... Once my son got into a public school, the speech therapy that he was supposed to get, he wasn’t getting it as often as he was so he was supposed to get it. He was supposed to get it three times a week. Sometimes he was getting it once a week, but it was almost never three times a week... As time progressed with this school, he went from not being aggressive with other people but being aggressive with himself - he was inflicting self harm, he’s biting himself. He’s hitting himself.”

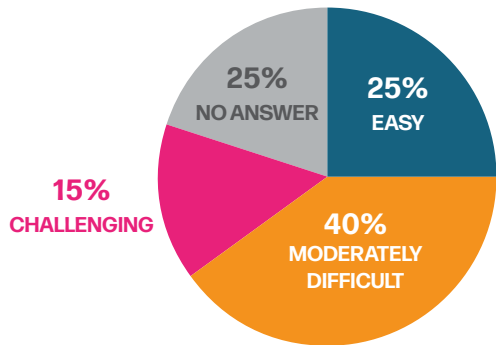
Some challenges with paraprofessional recruitment

We asked special education leaders to rank their experience with recruiting and retaining paraprofessionals. We learned that 55% of special education leaders consider hiring qualified paraprofessionals either “moderately difficult” or “challenging.”

When asked to describe why hiring qualified paraprofessionals is difficult or challenging, stakeholders noted the following:

- Finding the right person with the right qualifications was time-consuming. Many applicants for these roles did not have qualifications or education experience.
- Most paraprofessionals needed to receive training in order to perform their responsibilities.
- Paraprofessional positions are “easiest to fill but hard to keep.” Due to fluctuations in student enrollment and needs, it is difficult to keep paraprofessionals for multiple school years.

EXPERIENCE WITH RECRUITING AND RETAINING PARAPROFESSIONALS

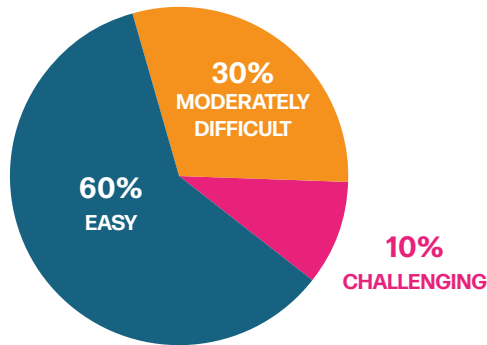


relative bright spot of special education service delivery, where stakeholders report being satisfied and having sufficient access to staff.

Some networks attributed the ease to hiring school psychologists on staff (including special education leaders who were themselves school psychologists). Others attributed the ease to reliable contracts with large external providers with whom they were happy.

“We have a great contract provider that’s better than when [we] had an in-house school psychologist.” CEO, SINGLE-SITE

SECURING QUALIFIED EVALUATORS FOR PUPIL APPRAISAL & EVALUATIONS



“It unlocks access to a team of dozens of people and various specializations (bilingual, etc.) ... There’s benefits to the contract-outsourcing vs. in-house - there’s more incentive to be efficient and they don’t get pulled into other business.” SPECIAL ED LEADER, SINGLE-SITE

The minority who considered it moderately difficult or challenging reported trying to bring pupil appraisal staff in-house, but struggling to fill positions or being unsatisfied with the quality of those personnel. For others, they found the internal management of external vendors to be challenging.

“The sheer number of teaching assistants and one-to-one paraprofessionals we have to hire are astronomical.” CEO, SINGLE-SITE

Alternatively, some stakeholders spoke to strong paraprofessional retention for multiple years, and their success cultivating teacher pipelines through their paraprofessional staff - this is a definite bright spot and promising practice worth further exploration.

Bright spot: securing qualified evaluators for pupil appraisal & evaluations

A majority of special education leaders (60%) considered it easy to secure qualified evaluators for pupil appraisal and evaluation needs. This is the one

“We tried to bring people in-house, but literally every person hired was not a good fit ... I had to then have it all redone a couple of years later because I knew how bad they were.” SPECIAL ED LEADER, SMALL CMO

“We looked for a school psychologist and literally couldn’t find anybody... We’re still contracting out for all evals and re-evals. So it’s just financially a little untenable for us. We’re outsourcing all of our evals ... which is extremely time-consuming, because we have to renegotiate everyone’s roles and responsibilities.” CEO, SINGLE-SITE

Stakeholders struggle to provide or access the IDEA continuum of placements and services.

We asked Special Education Leaders to reflect on their ability to provide or access the IDEA continuum of placements (i.e., inclusion, resource, self-contained, and specialized settings), as well as the extent to which their IEP teams may make decisions based on what they knew they could provide. CEOs often organically spoke to the topic of placements as well.

The majority of respondents (70%) considered providing the IDEA continuum of placements to be moderately difficult or challenging.

When disaggregated by peer group, the perceived sense of difficulty correlates with CMO size: the smaller the charter entity, the greater the difficulty. Specifically, 63% of Single-sites found it moderately difficult; 50% of Small CMOs found it challenging, and 40% of Large CMOs found it moderately difficult (while an equal 40% find it easy).

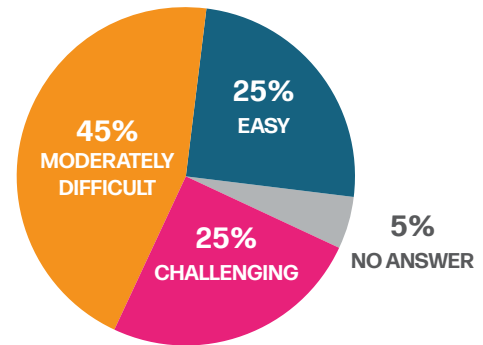
This is strongly aligned with the first theme, that stakeholders correlated CMO network size with the perceived ease of implementing special education programming. Logically, the ease of providing and implementing a broader continuum of placements, especially at the deeper end of the continuum for small groups of students requiring resource-intensive programming, would tend to correlate with the economies of scale commanded by larger CMO networks.

School stakeholders named similar reasons why providing or accessing the IDEA continuum of placements felt difficult or challenging, with many pointing to the lack of specialized staff and facilities.

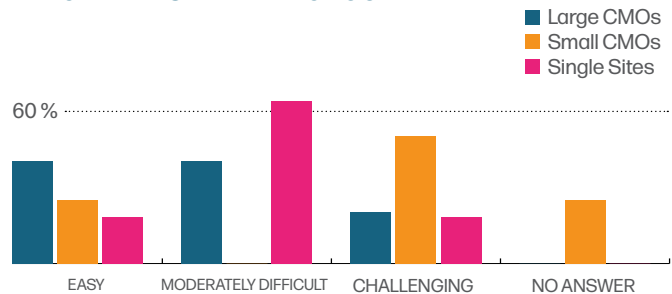
“It’s definitely been difficult to find staffing to fully get the continuum of services that we’ve needed.” SPECIAL EDUCATION LEADER, SINGLE-SITE

“What’s difficult is work[ing] with the school leader who may not understand it the way that we understand it. They’re dealing with staffing challenges and space issues, and they’re hearing us say, ‘you need a resource classroom, you need this self-contained classroom, you need this.’ And they’re like, ‘how am I gonna do that?’” SPECIAL EDUCATION LEADER, SMALL CMO

PROVIDING THE IDEA CONTINUUM OF PLACEMENTS



PROVIDING THE IDEA CONTINUUM OF PLACEMENTS BY PEER GROUP



Others cited the challenges of navigating external partnerships with programs outside of their CMO.

“It really takes a group effort, you have to get the family involved, you have to get the parents involved, and everybody kind of on board with all the agencies.” SPECIAL EDUCATION LEADER, SINGLE-SITE

Lastly, some noted that fluid and evolving student enrollments challenged the stability of a school’s planned and staffed placement options.

“Because of OneApp, we are definitely receiving students with various disabilities from different levels constantly coming in... It may call for a different staff member with different qualifications that we may not currently have.” SPECIAL EDUCATION LEADER, LARGE CMO

Stakeholders reflected on which parts of the IDEA continuum felt more challenging to provide or access, and 29% mentioned specialized programming for students with significant needs - sometimes organically, in response to other questions. Stakeholders across the spectrum of CMO peer groups noted challenges with specialized programming, specifically for the following student profiles:

- Students with autism, including programming that embedded Applied Behavioral Analysis therapy or Board-Certified Behavioral Analysts (BCBAs).
- Students with significant emotional and behavioral health needs - specifically, the need to create or expand additional therapeutic behavioral settings with more centralized access points.
- Students who are deaf or hard of hearing or students who are blind or visually impaired:

“We only have two [Blind] students who require that service, which makes it even more challenging when you only have a few students... We’re not like Jefferson [Parish] who can hire that one person and just send them across schools ... If you’re asking me if I feel like I found a solution, I’m going to have to say a resounding no.” SPECIAL EDUCATION LEADER, SMALL CMO

“We haven’t spent the time to build the continuum of what we want a specialized program to look like... and I think some of that is just capacity... I’m trying to build the program for kids with cognitive needs ... you’ve got other people doing emotionally disturbed, doing autism, but they’re also running regular schools ... So you consistently feel like, ‘I’m not doing a good job’ when like, I am spending every resource and doing everything I know how to do, but don’t have this very specialized thing.” CEO, LARGE CMO

“The reality is, we all end up with sub-par programs everywhere. Our current model does not incentivize schools to create specialized programs.” CEO, SMALL CMO

While specialized programming dominated discussions about the continuum of placements, some stakeholders noted concerns about the quality of instruction in inclusive settings.

“I don’t know that anyone has prepared the general education teachers who interact with some students with greater levels of IEPs, for the types of training that they might need to support those kids.” CEO, SMALL CMO

“Our challenges lie with doing push-in and differentiation, and with training classroom teachers to differentiate for kids with IEPs.” SPECIAL EDUCATION LEADER, SINGLE-SITE

To understand the ways in which perceived access to staffing and placements might be impacting school decision-making, we asked Special Education Leaders to agree or disagree with the following statement: **“My teams have had to make IEP decisions based on what we knew we could provide or access for that child.”** 50% of respondents answered “agree,” with 40% answering “disagree” and 10% not answering.¹⁷ One Special Education Leader at a Single-site narrated the tension that unfolded with placement decisions and budgets, illustrating the dilemma posed by the interview question:

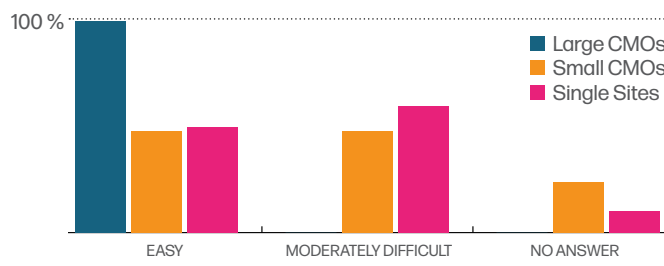
“It’s not that the CMO team or the folks who are approving different positions aren’t supportive... But I know sometimes it’s like, ‘Well, is there any other way we can do this? Is there any other placement we might be able to try before we’re doing this?’ And even though I may know what the best placement for the student is, I always have to keep in mind the amount of resources we have, especially if we get a kid in the middle of the school year.”

When answers were disaggregated by CMO peer group, a surprising trend emerged: **100% of Large CMO Special Education Leaders agreed that their teams had had to make IEP decisions based on what they knew they could provide.**

At face value, this seems incongruous with our much-discussed finding that increased CMO network

size correlates with the perceived ease of implementing special education programming. We know from companion analysis of student enrollment trends by the Public Consulting Group that Large CMOs are enrolling higher numbers of students with more significant disabilities,¹⁸ and thus are responsible for a broader array of specialized services and supports to a more diverse set of students than other CMO peer groups. At least one Special Education Leader at a Single-site acknowledged this, noting “We’re a small school, we’re doing the inclusion model, I don’t have any students right now that need to be in a resource room more than 20% of the day... but if somebody came in tomorrow that needed that, I’d be in real trouble.” Despite their comparatively advantaged

IEP DECISIONS BASED ON AVAILABLE RESOURCES



scale over their smaller counterparts, Large CMO answers to this question suggest that perhaps even they are unable to independently command access to the full continuum of placements and services that any student with a disability might require.

Families’ views on the state of special education.

We conducted focus groups with families of students with disabilities enrolled in New Orleans public schools to capture their perspectives and experiences with navigating the unique school system, and their children’s experiences with receiving special education services. In addition to their findings integrated above, we surfaced the following themes.

Parents shared that it can be challenging to find information to make informed enrollment choices about schools and programs with services that match their children’s needs. For some parents, this resulted in them changing school enrollment within the city in search of a school that could meet their child’s needs.

“It was very difficult to find a school ... because you’re not advised of what schools are the best schools for your child to go to based on their diagnoses. Mine is five years old and has autism. ...No one knows what the school offers. What’s the best school? You’re not given that information about anyone.”

“I decided to switch my son’s school because he had an IEP and was receiving zero services. He was sitting in a library watching DVDs and eating animal crackers. He’s very intelligent, but needed certain services so I decided to switch [schools].”

“I am from New Orleans, born and raised by a reputable school. So I wanted my daughter in public school. I believe in public education. It got me to where I was. When I picked the school, I looked for a school that had a reputation of having a good overall state grade or for having excellent teachers and parent involvement. What I did not realize was that some of that data can be misleading.”

“We’re not continuing with the school that we chose because of their lack of services given to my child and other children in her classroom. ... We picked it because of where it was, how it was promoted, and the diversity of the school and the location. ... They failed miserably. The teacher was wonderful. But the administration failed the teacher and failed the students. My child did not get the services.”

Some families also expressed feelings of despair and frustration encountering many well-intentioned but insufficiently trained educators in schools that don’t seem to improve.

“We’ve been promised a lot of things. We were told all the right things but then when we go

through the door that's just not how it played out. I think a lot of it came down to ignorance. We ended up at a school that did not have experience with diverse learners. I don't think they were trying to not do what they were supposed to do. I just don't think they had a clue what to do. And they're figuring it out and it's a slow process. I do see it getting better. But it is very slow, especially if you've got a kid caught in the middle of it... I think they just really did not know any better because they had never had a large population of diverse learners before."

"I don't understand how it's not a requirement for the staff to be trained to deal with various diagnoses from autism to ADHD and then other things. If they're not trained, there's no way that they can be a service or helpful to those individuals and there's no way that the child can even get to their fullest potential without them knowing what to do."

"I think they listen. I think that if you were to call them right now they would be able to tell you all of my concerns and issues. They just haven't done anything about it."

"[They listen] if it fits with something they already offer. They're happy to listen and get it going... but if it's not convenient for them, that's where you don't get anything back. I don't even get a counteroffer."

"No one cares ... I'm sure I'm not the only parent that has been emailing and talking and texting until we[re] blue in the face. And nothing has been done. I don't even want to attend this [focus group] meeting. Because I've gone to other meetings where they have parents focus in-person, and they're like, 'oh, we'll give you a \$25 gift card.' I don't want a gift card. I want change. [But] nothing is happening."

We asked participants to raise their hands if "you feel like your school has high expectations for what your child can achieve," and separately, "if you feel like your child is currently achieving up to their full potential." **Zero participants raised their hands in agreement with either statement.**

Families shared that they want schools with the following qualities, commitments, and services for their children with disabilities:

- Educating students with disabilities is a priority for school leadership
- Special education teachers and services are available, willing, and capable.
- Transparency in communication with parents about the availability of staff and services
- A school administration that is transparent and accountable
- A smaller classroom setting
- At least two teachers in a classroom
- Counselors who can provide services when needed
- Good academic programs while addressing behavioral problems

Relative strengths and bright spots

During school stakeholder interviews, we invited stakeholders to share their network's relative strengths. Across the totality of responses, school stakeholders observed the following:

- Ensuring every child is as fully included in the typical classroom as possible
- Meeting the individualized needs of every kid
- Willingness to creatively adapt, evolve, and try something different
- Providing various levels of programming and a range of services (e.g., specific curriculum intervention)
- Maintaining deep relationships with families and service providers
- Training general education and special education teachers to work collaboratively
- Ensuring adequate placements for students
- Providing coaching and professional development support to special education teachers by content experts

Detailed Methodology and Scope of Interview Pools

TO CONDUCT THE STUDY and gather stakeholder perception data, CLE interviewed both school stakeholders (i.e., individuals who work in a New Orleans charter school) and families of students with disabilities currently enrolled in New Orleans public schools. We will provide details regarding the pool of school stakeholders, and then discuss our focus group methodology for engaging families of students with disabilities. Lastly, we provide a copy of our school stakeholder interview protocol.

Designing the School Interview Sample

To collect data representative of the local ecosystem of schools for this qualitative study, CLE used a quota sampling method by selecting a diverse pool of charter management organizations (CMOs) currently operating schools in New Orleans. CLE's sample sizes and corresponding analysis are tied to the 2022-2023 school year when interviews occurred. In the 2022-2023 school year, there were 72 public charter schools operated by 36 charter management organizations (CMOs), all of whom are authorized by the Orleans Parish School Board (OPSB) and NOLA Public Schools.¹⁹

To select a diverse pool, we peer-grouped CMOs by the underlying number of schools they operate, defining three peer groups of CMOs:

- (1) *Large* CMOs, running three or more schools,
- (2) *Small* CMOs, running two to three schools, and
- (3) CMOs operating *Single-site* schools (i.e., "Single-sites").

When viewing the school system through this lens, there are six large CMOs, six small CMOs, and 24 Single-sites operating schools authorized by OPSB/NOLA Public Schools in the 2022-2023 school year. Applying our quota sampling method, CLE invited 24 CMOs to interview:

- 5 of 6 Large CMOs,
- 5 of 6 Small CMOs, and
- 14 of 24 Single-sites for interviews.

For each CMO invited, CLE requested two interviews, with *both* the CEO (or their designee) *and* the

Special Education Leader to get a diverse perspective on the subject matter. Our total interviewee pool reached 48 individuals (two per CMO). In our interview protocol, CLE invited each interviewee to share facts about all schools in their network.

Regarding response rates by CMO (N=24), 96% responded and participated. Regarding response rates by stakeholders (N=48), 71% responded and participated on behalf of their CMO. To understand our response rate with regards to getting *both* the CEO and Special Education Leader of a CMO:

- for 46% of CMOs we contacted, *both* the CEO *and* Special Education Leader participated on behalf of their CMO (meaning, 2 interviews for that CMO);
- for 50% of the CMOs contacted, *either* the CEO *or* Special Education Leader participated (1 interview for that CMO);
- for 4% of CMOs contacted, neither candidate responded.

After reaching out to these CMOs, CLE continued monitoring and tracking the types of charter schools that participated in this research to ensure that the completed interviews represent a diverse enough sample so that no subtypes in the local school ecosystem were underrepresented. Because of the nature of qualitative research and our use of quota sampling (instead of random sampling), CLE acknowledges the limitations of our data collection methodology and does not claim that the findings from this research can be generalized to represent the entirety of the NOLA Public Schools ecosystem. We sought to engage with a diverse enough group of leaders to get a deeper dive into their understanding and opinions about special education and the centralization proposal.

Scope of School stakeholders

All told, CLE interviewed 34 school stakeholders representing 23 CMOs. The scope and representation of this interview sample can be understood in multiple

ways, narrated below. Significantly, the interview sample reaches 76% all public charter schools within OPSB/NOLA Public Schools' portfolio, and 63% of the charter management organizations (CMOs) authorized to operate these schools.

By the number of CMOs currently authorized to run charter schools by OPSB/NOLA Public Schools, disaggregated by peer group

If one understands the New Orleans school system by the number of CMOs authorized by OPSB/NOLA Public Schools to operate LEA charter schools,²⁰ then our sample size (N=23) reaches 63% of CMOs in the city (N=36).

Applying CLE's sampling methodology of Large CMOs, Small CMOs, and Single-site peer groups, our interviews reflect 83% of Large CMOs, 83% of Small CMOs, and 54% of Single-sites.

	CLE Sample (Total)	% of Peer Group
Large CMOs (3+ schools)	5 (of 6)	83%
Small CMOs (2-3 schools)	5 (of 6)	83%
Single Sites (1 school)	13 (of 24)	54%
23 of 36 charter operators, or 63% of charter operators		

By the number of schools represented by the 23 CMOs

Because each unique CMO operates differing numbers of schools (each of whom holds LEA status), we also wish to interpret our sample size by the schools represented. Totaling the number of schools operated by each CMO represented in the interview sample, aggregated by peer group, the interview sample reaches 55 schools, or 76%, of a total 72 charter schools authorized by OPSB / NOLA Public Schools.

	Number of schools run by CMOs in CLE's Sample	Total number of schools reflected in the peer group city-wide
Large CMOs (n=5)	28	32
Small CMOs (n=5)	14	17
Single Sites (n=13)	13	24
Total	55	72

By the percent of the CMO sample that is currently or has previously delegated LEA status to OPSB

While the state statutory default is for each New Orleans charter school to be legally designated as their own Local Educational Agencies (LEAs) for purposes of special education, New Orleans CMOs have the option of designating the Orleans Parish School Board to act as the LEA of their schools. Of the 23 CMOs interviewed, 30% are currently or have previously opted into OPSB's LEA for purposes of special education.

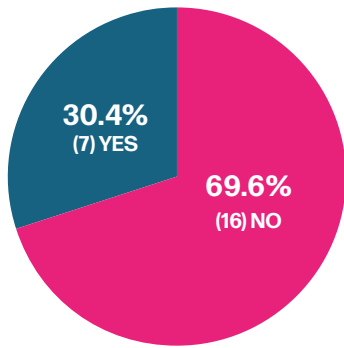
The percent of stakeholders who are CEOs vs Special Education Leaders

Of the 34 stakeholders, 14 were CEOs and 20 were Special Education Leaders. Thus, 41% of our stakeholders represent CEOs and 59% of our stakeholders represent special education leaders (at the CMO network level, unless a Single-site).

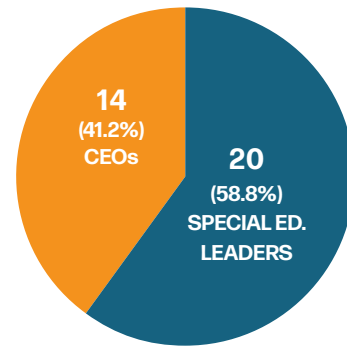
Cross-tabulating interviewee role (CEO or Special Education Leader) by peer group (Large CMO, Small CMO, or Single-site)

If we cross-tabulate our stakeholders by role and CMO peer group, we understand that the largest contingent is Single-sites: 20% of the sample is CEOs of Single-site charter schools and 32% of the sample is Special Education Leaders of Single-site charter

CMOS CURRENTLY OR PREVIOUSLY DELEGATED LEA STATUS TO OPSB



THE PERCENT OF STAKEHOLDERS WHO ARE CEOs VS SPECIAL EDUCATION LEADERS



schools. The next largest stakeholder group is Special Education Leaders of Large CMOs, 14% of the sample.

Stakeholders' tenure in their respective roles and experience outside the unique New Orleans charter ecosystem

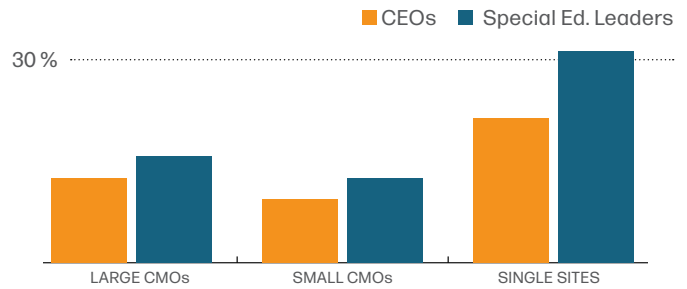
We asked each of our stakeholders to share their tenure in their roles and whether they had experience working outside of the New Orleans school system.

- *Of the CEOs we interviewed*, the average length of their tenure as CEO was 7.4 years. The range of tenure length stretched from 1 year to 17 years. 79% of CEOs interviewed had experience working outside of the New Orleans public school ecosystem.
- *Of the Special Ed Leaders we interviewed*, the average length of their tenure in their current role was 5.8 years. The range of tenure length stretched from 1 year to 12 years. 75% of special education leaders interviewed had experience working outside of the New Orleans public school ecosystem.

Interviews with families of students with disabilities

CLE partnered with Families Helping Families (FHF) NOLA, a nonprofit family advocacy organization, to host three virtual focus group sessions for families of students with disabilities in June 2023. We used a

CROSS-TABULATING INTERVIEWEE ROLE BY PEER GROUP



focus group as a group interview method with people who share similar experiences regarding students with disabilities in NOLA Public Schools. FHF NOLA led outreach, recruitment, and registration for the focus groups with their extensive network as a grassroots advocacy organization for families of children with disabilities. FHF NOLA also provided expert advice and guidance on all aspects of designing the focus group process, including the decision to have the focus groups be virtual in lieu of in-person. At each focus group, we obtained informed consent from these participants and compensated them with a small stipend in recognition of their time.

A total of 16 stakeholders participated in CLE's three virtual focus groups: 12 parents, one educator, and two young adults with disabilities who are alumni of the post-Katrina public school system.²¹

School Interview Protocol

CLE conducted school stakeholder interviews using a semi-structured interview protocol. CLE's school stakeholder interviews were conducted in November and December of 2022, with outreach and individual invitations to stakeholders beginning in October 2022.

BEFORE THE INTERVIEW

» *Interview Overview: Review the purpose of the study and ask for consent to record.*

» *Begin recording the interview.*

OPENING

» Can you introduce yourself and tell me how long have you been in your leadership role?

» Prior to this role, have you worked in other charter networks? Locally or elsewhere? In a traditional district?

» How would you describe the population of

students with disabilities in your school or network, in terms of proportion of the student body and their range of needs?

» How big is your special education staff? (**Special Education Leaders only**)

Research Topic 1: Current Perceptions of Special Education

“Our first topic relates to your perceptions and experiences with coordinating and delivering special education programs and services to best meet the needs of your students with disabilities.”

» When it comes to your school or network's special education programs for students with disabilities, in what ways do you excel? What are the components of that success?

» In what ways are you challenged? What do you think is the cause of that challenge?

» How would you rate your experience with retaining special ed leadership? *Easy; Moderately difficult; challenging - why? (CEOs only).*

» How would you rate your experience with recruiting and hiring highly qualified special educators? *Easy; Moderately difficult; challenging - why? (Special Education Leaders only)*

» How would you rate your experience with

securing qualified professionals to conduct evaluations & re-evaluations? *Easy; Moderately difficult; challenging - why? (Special Education Leaders only)*

» How would you rate your experience with securing qualified providers for related services? *Easy; Moderately difficult; challenging - why? (Special Education Leaders only)*

▪ Are there related services providers that are hard to find?

▪ To what extent do you contract with third party providers for some aspect of special education services?

» How would you rate your effectiveness at hiring qualified paraprofessionals? *Easy; Moderately difficult; challenging - why? (Special Education Leaders only)*

» How would you rate your effectiveness at providing or accessing the IDEA continuum of placements (inclusion, resource, self-contained, specialized

setting)? *Easy; Moderately difficult; challenging - why?* (**Special Education Leaders only**)

- Is there a particular part of this continuum that has been more challenging to deliver or access?
- » “My teams have had to make IEP decisions based on what we knew we could provide or access for that child.” Would you agree or disagree with that statement? (**Special Education Leaders only**)
- » “My teams have had to rely on paraprofessionals to meet the needs of individual students in the absence of a specialized setting.” Would you agree or disagree with that statement? (**Special Education Leaders only**)

» When it comes to current special education funding, are you getting sufficient per-student funds to cover the costs of the special education programs that your students need? (**CEOs only**).

- If it is insufficient, what is the cause for the ongoing gap?
- » Is there anything you’ve gotten really good at right-sizing the cost of? What do you attribute that to?

Research Topic 2: Centralization, in Theory

“I’m going to ask you some questions to better understand the impact of decentralization and get your opinion on centralizing special education in theory. Our system is highly decentralized, with every school legally its own LEA, or school district. This means every school is individually responsible for the full array of special education responsibilities.”

- » Has your school or network ever opted into the OPSB LEA?
- If not, why?
- If yes, what motivated your decision to join?
- If you have since left the LEA, why?
- » Does a proposal to “centralize special education” sound like something that would improve your ability to meet the needs of your students with disabilities? Why or why not?

▪ Is there a specific population of students with disabilities that come to mind to inform your answer?

▪ What would be the benefits? What would be the drawbacks?

» What if centralization of special education came with multiple levels of engagement, and you could opt into a la carte services - would that be beneficial? What types of services would you consider?

» What aspects of autonomy would you be willing to give up because centralization would make it worth it? (**CEOs only**).

» Do you have a tipping point where it stops making sense to do something in house? i.e., you could develop a program in house for \$60K per student but pay \$40K in tuition to another school instead? (**CEOs only**).

Research Topic 3: Needs, Bottom Lines, and Motivating Factors

“Now I want to get your opinion on the tactical components of making centralization happen.”

» If you could pick an entity to be a centralized hub for special education services, who would you choose?

» I’m going to read a statement and ask you to fill in the blank. “If NOLA Public Schools convenes schools to discuss centralizing special education, ...

▪ _____ needs to be true for me to consider it.”

▪ _____needs to be addressed during the planning process.”

» One idea is to create a governing board of charter schools to oversee the centralization entity - its operations and governance. How significant does that feel to your willingness to explore centralizing special education? *Critical; important; nice to have; no impact*

» What’s your reaction to NOLA Public Schools being the entity where centralized special education services are coordinated?

» What would have to change for you to consider NOLA Public Schools as the place for centralized services?

» If NOLA Public Schools is the entity that hosts centralized special education services, one idea is to explore creating a firewall to separate the centralized services department from the accountability office. How significant does that feel to your willingness to explore centralizing special education? *Critical; important; nice to have; no impact*

» What is the most significant factor that informs your opinion on centralizing special education?

CLOSING

» What questions do you wish I had asked that I didn’t?

» Is there anything else you’d like to add about this idea?

Endnotes

1 For the remainder of this paper, we will refer to “special education” and “special education programming” as an imperfect but efficient way to refer to a totality of programs, services, and supports for students with disabilities eligible for services under the federal Individuals with Disabilities Education Act (IDEA). Special education is neither a place nor a label; it is a set of services that some students receive to support their academic and behavioral success. The purpose of special education is to provide individualized services to ensure that students with disabilities can access learning and achieve their most ambitious personal goals.

2 An “Educational Service Agency” is a “regional public multiservice agency (i) authorized by state law to develop, manage, and provide services or programs to local educational agencies; and (ii) recognized as an administrative agency for purposes of the provision of special education and related services provided within public elementary schools and secondary schools of the state.” Individuals with Disabilities Education Act (IDEA), 20 U.S.C. § 1401(5). For more information, please see CLE’s companion publication, *Educational Service Agencies: Public Infrastructure to Solve Charter Schools’ Special Education Capacity Challenges*.

3 Smith, V. “How Teacher Preparation Programs Can Help All Teachers Better Serve Students with Disabilities.” American Progress. January 2020. <https://www.americanprogress.org/issues/education-k-12/news/2020/01/23/479675/teacher-preparation-programs-can-help>.
Cai, J. “Black Students in the Condition of Education 2020.” National School Boards Association.

June 2020. <https://www.nsba.org/Perspectives/2020/black-students-condition-education>.

4 By “decentralized system” we mean every New Orleans charter school authorized by NOLA Public Schools / Orleans Parish School Board is designated its own Local Educational Agency (LEA) for purposes of special education, pursuant to the state charter school statute.

5 To ensure a diversity of charter school perspectives, we identified three peer groups of CMOs: Large CMOs, operating three or more schools; Small CMOs, operating two to three schools; and Single-site CMOs, operating one school. We solicited stakeholder interviews with mindfulness to capture a diversity of voices across these peer groups.

6 We also heard from several stakeholders about their interest in centralization for meeting the needs of English Learners, an issue that came up multiple times across the totality of interview data.

7 For a refresher on the existing option to delegate LEA status to NOLA Public Schools, please see the snapshot, *Reflecting on NOLA Public Schools’ Optional LEA* on page 31.

8 Anticipating this barrier, our interview protocol explored this theme with CEOs, asking whether, why, and under what conditions they were willing to give up some autonomy because centralization would make it worth it. Additionally, concerns with infringements on autonomy came up organically in response to other questions.

9 P.B. et. al. v Brumley, 2:10-cv-04049. Eastern District of Louisiana. Filed Oct. 26, 2010. For more information see <https://bit.ly/3MtTdwH>.

10 Specifically, CLE asked stakeholders, “If NOLA Public Schools is the entity that hosts centralized special education services, one idea is to explore creating a firewall to separate the centralized services department from the accountability office. How significant does that feel to your willingness to explore centralizing special education? Critical, Important, Nice to Have, no impact.”

11 An Educational Service Agency as a vehicle for city-wide centralized services is not limited to special education – it can contain centralization of any agreed-upon systemwide function that stakeholders see fit to allocate. We note that school stakeholders already raised other service areas in their interviews, ranging from English Learner programming and services to Medicaid billing and transportation.

12 20 U.S.C. § 7801(17)

13 As a general note, this section on stakeholder perceptions around special education presumes a level of fluency and knowledge of core aspects of special education program delivery. Further context and definition of these components of law and practice will not be provided in this paper. For more information, please visit the U.S. Department of Education’s landing page for information regarding the Individuals with Disabilities Education Act (IDEA), at <https://sites.ed.gov/idea/topic-areas/>.

14 Cowen Institute at Tulane University. “New Orleans Public Schools Governance Chart 2022-2023.” <https://bit.ly/45XVA1G>. Hereinafter, “Cowen Governance Chart.”

15 This crisis is not unique to New Orleans. There is a widely documented national talent pipeline and

attrition crisis for special educators. See Hawkins, Beth. “Yes, There’s a Shortage of Special Education Teachers, and That’s Nothing New.” The 74. Sept. 15, 2022. <https://bit.ly/3FMWzXM>. We also acknowledge the significant leadership and investments by the Orleans Parish School Board and New Schools for New Orleans in tackling broader educator pipeline crises. We hope that our findings shed helpful light on new ways to understand the problem. See New Schools for New Orleans. “First Round of Systemwide Needs Program Funding Helped Train and Hire New Teachers and Provide Support for Specialized Programming.” Jan. 10, 2023. <http://bit.ly/469b6HT>.

16 Note: only five Single-site schools opted into designating NOLA Public Schools as their LEA in the 2022-2023 school year. See Cowen Governance Chart *supra* fn. 9.

17 We recognize that during our interviews, many special education leaders found this question to be provocative.

18 We reference the Public Consulting Group’s (PCG) companion findings that Large CMOs enroll greater numbers of students at the highest tiers of special education minutes compared to other CMO peer groups. PCG’s findings are based upon the District Level Funding Allocation (DLFA) formula, which includes five tiers of funding for students with disabilities based on special education service minutes. For more information on DLFA, see New Schools for New Orleans. “Just the Facts: The Superintendent’s Role in School Funding.” Feb. 3, 2022. <https://bit.ly/40qYL0K>.

19 See Cowen Governance Chart, sourced above in fn. 9. We acknowledge that these numbers have

changed in subsequent school years due to the nature of the charter authorizing process, with some operators and schools closing and other schools switching operators.

20 Each CMO operates one or more schools - some operate one, and some operate as many as eight.

21 To ensure consistency within the family data set, we limited our data analysis of key relevant statistics (i.e., % whose children had not received an IEP service) to the 12 parents of students with disabilities currently enrolled at a New Orleans charter school as of June 2023.

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