

Foreword

This report was produced by a Program Review Team that was commissioned by the Colorado Department of Education (CDE) and the Colorado School for the Deaf and Blind (CSDB), at the request of the Joint Budget Committee of the Colorado General Assembly, to conduct an independent review of the student outcomes and operations of the CSDB. The Program Review Team was made up of eight individuals with expertise in: the education of deaf/hard of hearing (D/HH) and blind/visually impaired (B/VI) students; special education; school finance; student assessment; and district/school administration. The Team had the full cooperation of the CSDB and CDE leadership and staff, and we are grateful for their support. We also want to acknowledge the willingness of CSDB students, parents and members of a variety of stakeholder groups to openly share their thoughts regarding the areas of strength and places for improvement in the operations of CSDB.

This review was conducted independently over a span of seven months from January to July of 2019. The Program Review Team approached this work with no agenda or pre-conceived idea of what we would learn. This report was co-written by the Team with no involvement of CSDB, CDE or other groups. It reflects what we were told, what we observed and what we read. That is to say, our findings and recommendations are based on a number and variety of data sources that included interviews, focus groups, surveys and discussions with a variety of stakeholders, observations of classroom practice at CSDB and reviews of organizational documents and student performance data, among others. The findings are not intended as criticism of CSDB, but rather a summary of what we learned. The recommendations are both immediate and long-term suggestions for improving the outcomes for D/HH and B/VI students and their families statewide that involve CSDB, CDE and stakeholders across Colorado.

It has been an honor for the team to engage in this work and it is our hope that the report will be useful in helping Colorado to better meet the needs of these students and their families.

Elliott Asp, Ph.D.
Team Facilitator

August 2019

Program Review

Colorado School for the Deaf and the Blind



Colorado Department of Education

Program Review
Colorado School for the Deaf and the Blind

August 2019

Colorado School for the Deaf and the Blind

Executive Summary

Introduction and Background

Colorado has attempted to improve education for deaf/hard of hearing (D/HH) and blind/visually impaired (B/VI) students for almost 30 years. A statewide plan for the education of this population — a plan developed by the Colorado Department of Education (CDE) and the Colorado School for the Deaf and the Blind (CSDB) — was published in June 1990. Interestingly, this plan was based on a “program audit of CSDB.” However, very few of the recommendations in that report were implemented. In the ensuing years, a variety of additional “plans/solutions” followed: blueprints; joint agreements for reform among a variety of stakeholders; recommendations to the legislature and governor; and publication of the proceedings from conferences. Like the “1990 plan,” all of these resulted in little or no change.

Taken together, these documents constitute a plethora of findings and recommendations that have, for the most part, never been acted on in 29 years. Many of the recommendations from each new effort look very similar to those of their predecessors. This lack of action based on past efforts has led this Program Review Team to develop two types of recommendations. One set comes directly from our review of the student outcomes and operation of CSDB and focuses on improving the various components of the program at the school. The other set is focused on the future of education for D/HH and/or B/VI students and services for their families in Colorado. We do not want this program review to be another layer on the “pile” that has little or no impact. We hope this report will move our state to action so that Colorado can take its place as a national leader in educating D/HH and/or B/VI students by truly meeting their needs and those of their families.

Process for the Program Review

Over the past several years, external stakeholders identified a variety of concerns about student outcomes and operations at CSDB. This cumulated with some groups sharing their concerns with the Joint Budget Committee (JBC) of the Colorado General Assembly at its annual review of the CDE in December 2017. JBC staff examined the issues raised by these groups about CSDB’s performance and operations and CDE’s role in overseeing the school. As a result of that work, JBC staff recommended that the committee ask CDE to contract for “an independent external financial and performance review of the operations, performance, and academic

Program Review
Colorado School for the Deaf and the Blind

August 2019

expectations and outcomes of the school.” CSDB and CDE acknowledged the concerns and JBC staff’s recommendation and agreed to contract for an independent program review.

The JBC staff, the Consortium of Colorado Directors of Special Education and several advocacy groups identified a variety of topics that they felt the program review should address. A Program Design Team was formed in December 2018. Team members included personnel from both CSDB and CDE; national experts in D/HH and B/VI education; and state leaders in special education, school finance, and school assessment and accountability. Based on the concerns expressed to the JBC and input from a Stakeholder Advisory Committee, the Program Review Design Team identified six primary components for the review: on-campus instructional program; student academic outcomes; outreach program; early-intervention services; resource allocation and per-pupil spending; and oversight, accountability and transparency. Indicators and sources of data were identified for each component. The process was also informed by the frameworks in the National Association of State Directors of Special Education publication *Optimizing Outcomes for Students Who Are Deaf or Hard of Hearing: Educational Service Guidelines* (NASDSE, 2018) and the Association for the Education and Rehabilitation of the Blind and Visually Impaired publications *Accreditation Handbook for Organizations* and *Accreditation Standards Organizations and Schools* (AERBVI, 2018).

The Program Review Team — composed of national and state experts in the education of the D/HH and B/VI, special education, Colorado school finance, student assessment and administration/governance — was convened in January 2018 (with some overlapping membership from the Program Design Team). From February 2019 to June 2019, the Program Review Team collected data from a variety of sources, including:

- Observations of every classroom in CSDB’s campus for the deaf and campus for the blind;
- Focus groups with teachers, students and parents from the school’s two campuses;
- Interviews with the members of the board of trustees, the CSDB superintendent, and CSDB education and program leadership;
- Multiple interviews with leaders and members of advocacy groups;
- Interviews with leadership of the CDE and the Colorado Commission for the Deaf, Hard of Hearing and Deaf/Blind;
- Three public town-hall meetings in locations across the state and a public online questionnaire;
- Survey of Colorado Directors of Special Education;
- Reviews of CSDB student performance on state assessments and the CSDB’s School Performance Framework rating;

Program Review
Colorado School for the Deaf and the Blind

August 2019

- Review of CSDB position descriptions, staff qualifications and organization chart;
- Analysis of CSDB budget and staffing;
- Review of the summary of the findings from the December 2018 CDE Supervision and Monitoring Visit; and
- Independent review of the function and accessibility of the CSDB website.

Key Findings

A great deal of information was collected by the Program Review Team from a variety of sources, and a more detailed description of findings for every component of the program review can be found in the full report. Listed here are the major areas of strength and areas that are the most critical to the immediate improvement of the program at CSDB, as well as issues that the state (e.g., the CDE and other agencies) must address to ensure a more coordinated and comprehensive set of services and supports for students, families and practitioners across Colorado.

- Directors of Special Education from administrative units (AUs)/school districts across the state report that CSDB plays a critical role in Colorado by serving students whose needs can't be met in their local districts, particularly in small rural districts.
- Parents and school-district personnel report that their students find CSDB to be a safe, caring and supportive environment.
- Both D/HH and B/VI students report that the opportunity to interact with “like peers and adults” is one of CSDB’s most positive aspects.
- CSDB provides opportunities for students to develop life skills, gain work experience and become post-secondary-ready through initiatives such as the Residential Program and the Employability Center.
- Residential-program employees communicate on a regular and frequent basis with instructional staff and provide support for students’ individual academic and personal goals and keep parents well informed about students’ academic progress and social/emotional development.
- CSDB’s Outreach Program provides support for students, families and practitioners through a variety of delivery methods, including direct service, online and distance learning via video conferencing.

Program Review
Colorado School for the Deaf and the Blind

August 2019

- The Early Intervention Program staff report that they evaluate children from birth through age 3 who are D/HH and/or B/VI and provide resources to all families of whom they are aware and seek to support families in understanding all options and communication choices for their children.
- The major focus at CSDB has been on the education of D/HH students with much less emphasis on the campus for the blind.
- The campus for the deaf is primarily an “ASL environment” with limited support for students and families who have chosen other communication options.
- Student achievement and growth at CSDB, as measured by state assessments, is generally below state grade-level expectations, and the performance of CSDB students is generally lower, on average, than students at other alternative educational campuses and other D/HH and/or B/VI students in the state.
- Key improvements in the instructional program are needed on both campuses in order to increase student academic outcomes.
- The inability to recruit and retain qualified staff impacts the quality of instruction and the continuity of programming.
- CSDB appears to have an excessive number of senior leadership/administrative positions for a school/agency of its size.
- Outreach services, while attempting to meet specific district, student and family needs with limited staff, appear fragmented and are neither coordinated with the CDE nor based on a comprehensive assessment of needs across the state.
- Oversight of the operations and outcomes at CSDB has been limited because of the following: board reliance on the experience of the superintendent; classification of CSDB as an alternative-education campus in the state accountability system; and CDE’s perceived lack of legal authority to supervise, oversee or intervene in the operation of the school.
- Statewide services for families and school districts are fragmented and compartmentalized, and there is little coordination and collaboration among various service providers. This is due, in part, to philosophical and pedagogical disagreements and the lack of an overall plan.
- Comments from the town-hall meetings and the online questionnaire indicate the need for a clear and easily accessible source for families to learn about available services and resources.

Major Recommendations

The following overarching recommendations focus on the most critical areas for improvement at CSDB and action that is imperative at the state level to better meet the needs of D/HH and/or B/VI students and their families. They are described in more detail in the body of the report. The report also includes a number of more-detailed recommendations for each component of the program review.

Immediate Improvement

- CSDB leadership (administration and board of trustees) should give additional attention to the operations and outcomes of the school for the blind. This could take a variety of forms, including a separate strategic school plan that identifies specific goals for professional development of staff and student achievement and growth, as well as gives periodic reports to the board about the operations and student outcomes.
- CSDB should provide all students and their families who attend or are served by CSDB access to the full range of communication methodologies/options available to them in any public school in the state. All forms of access to language should be made available and supported by CSDB.
- The board of trustees and the superintendent should mutually develop a formal evaluation process for the superintendent. The superintendent's goals and the measures and process for judging his/her performance should be easily accessible on the CSDB website.
- Board members should receive hands-on, concrete training about their statutory responsibilities regarding oversight and supervision and how those are implemented in practice.
- CSDB should engage in instructional-program improvement activities this fall in the following four areas: recruitment and retention of qualified and experienced staff; use of accommodations and access strategies for all students; data-driven effective instruction; and increasing partnerships with parents, organizations and other community members. This should include specific goals, implementation plans, progress measures and ongoing professional-development activities tied to the improvement goals.
- CSDB leadership should review the current number of administrative positions and reallocate some of them to provide ongoing support for instructional improvement (e.g., math and literacy coaches). The duties of the Director of Curriculum and Instruction position should be restructured to include supervision of principals and additional direct involvement with instructional support.
- CSDB Outreach staff and CDE specialists in deaf and blind education should meet, under the direction of the executive director of CDE's Exceptional Student Services Unit (ESSU), to jointly clarify which

services each agency is currently providing and which service needs are not being met. Also, they should develop a coordinated plan that will capitalize on the expertise, experience and resources available in both agencies. That plan should be communicated to school district special-education directors and superintendents across the state.

- CSDB leadership should work closely with ESSU staff to define and determine CSDB's Early Intervention Program (for both D/HH and B/VI) in light of the ongoing work of the CDE and the Colorado Department of Human Services (CDHS) to shift authority for early-intervention evaluations and supports to the CDHS, through the interagency work of 2018 House Bill 1333.
- Early Intervention staff must ensure that family trainings and support offerings are available outside the Pikes Peak Region.
- Early Intervention staff should ensure that parents have access to a range of communication methodologies/options from which they can choose and that all options are fully supported.
- CSDB and the CDE, under the direction of the executive director of ESSU, should jointly conduct a statewide outreach needs assessment and utilize the findings to develop a plan to meet those identified needs.
- Based on feedback from stakeholders at the town-hall meetings and the online questionnaire, there is a need for a single point/source for parents to access communication about resources and support (e.g., a website that is continually updated and maintained with some access to a staff person for questions and clarifications). It may be most helpful to have separate "sites" for D/HH and B/VI. This should be developed jointly by the CDE, CSDB and key stakeholders.

Long-Term Action and State-Level Action

- The CSDB superintendent should form and develop separate D/HH and B/VI ongoing advisory councils composed of a wide variety of stakeholders (e.g., state agencies, parents, students, CSDB personnel, teachers, AU special-education directors and advocacy group leaders — all of whom should be geographically balanced and include blind and deaf individuals) for the purpose of creating a forum where different philosophical and pedagogical views on how to educate these students could be shared/discussed with an opportunity to build consensus.
- CSDB should become nationally certified through the appropriate deaf and blind education national accreditation processes.

- CSDB should set an aspirational goal to become a collaborative partner with school districts, families and advocacy groups, among others, to model effective practices and more effectively use existing resources to enhance and develop services statewide.
- With leadership from the CDE Commissioner’s Office and based on the results of the statewide needs assessment, Outreach staff and CDE personnel — in coordination with AU special-education directors — should explore different service models (beyond what is currently in place), beginning with the areas of greatest need. In addition, CSDB, in coordination with the CDE, should develop partnerships with higher education to enable local AU staff to become licensed/certified in areas of critical shortage, as well as increase staff-capacity building to meet student needs.

Structure of the Report

This program review of CSDB’s operations and student outcomes was jointly commissioned by the school and the CDE in response to deaf-education advocacy groups’ concerns about CSDB that were shared with the JBC of the Colorado General Assembly. The review was conducted from February 2019 to July 2019 by an independent team made up of national and state experts in the following areas: education of the deaf and blind; special education; Colorado school finance; student assessment; and administration/governance.

This report contains the following sections:

- Historical background on previous reports about the education of D/HH and/or B/VI students in Colorado;
- Fundamental beliefs that informed the program review;
- Origin and process for the program review;
- Data sources, findings and recommendations for each of the six components of the program review;
- References; and
- Appendices.

Program Review
Colorado School for the Deaf and the Blind

August 2019

Table of Contents

Historical Background.....	10
Fundamental Beliefs.....	11
Process for the Program Review.....	12
Findings and Recommendations on On-Campus Instructional Program.....	14
Findings and Recommendations on Student Academic Outcomes.....	39
Findings and Recommendations on Outreach Program.....	48
Findings and Recommendations on Early Intervention Programs.....	57
Findings and Recommendations on Resource Allocation and Per-Pupil Spending...	62
Findings and Recommendations on Oversight, Accountability and Transparency....	72
References.....	97
Appendices	
a. Participants in Program Review.....	98
b. Report from Town-Hall Meetings and Online-Survey Analysis.....	102
c. Website-Review Report.....	110

Program Review
Colorado School for the Deaf and the Blind

August 2019

HISTORICAL BACKGROUND

For the past 29 years, Colorado has been on a path to improve education for D/HH and/or B/VI students. A document jointly produced by the CDE and CSDB and published June 30, 1990, identified eight areas to be addressed and corrected. This document, *Statewide Plan for Delivery of Educational Services to Children Who Are Hearing Impaired/Deaf or Visually Impaired/Blind*, identified areas to address to improve the delivery of services for D/HH and/or B/VI in Colorado. This document identified ways to fully implement changes identified in the report by June 1992.

Of the eight major recommendations in the plan, three have been implemented. This new report is being released almost exactly 29 years after the first plan was developed. In the interim, there have been a series of additional publications in the form of a blueprint; summaries/findings from convenings and conferences; a set of agreements developed by advocacy and stakeholder groups; reports to the legislature from state agencies; and recommendations to the governor and the legislature by state agencies and advocacy groups. While many of these efforts have been focused on the education of D/HH students, the original 1990 plan included the education of B/VI students, too. Some of the same people who were interviewed for this program review participated in the development of the 1990 plan.

Taken together, these documents identify findings and recommendations that have, for the most part, never been acted upon since the first report was published 29 years ago. Many of the recommendations from each new effort look very similar to those of their predecessors. This lack of action has led this review team to develop two types of recommendations. One set comes directly from our review of the student outcomes and operation of CSDB and focuses on improving the various components of the program. The other looks at the future of education for D/HH and/or B/VI students and services for their families that we hope will provide a roadmap for practitioners, stakeholders and policymakers. The goal of the review team is to provide a positive path for change and growth for services delivered to all D/HH, B/VI and deaf-blind children in Colorado. We do not want this review to be another layer on a stack of papers that have had little or no impact on the quality of education for Colorado's D/HH and/or B/VI students. Instead, we hope this report will move our state to action so that Colorado can take its place as a national leader in the education of the D/HH and/or B/VI and truly meet the needs of these students and their families.

Program Review
Colorado School for the Deaf and the Blind

August 2019

FUNDAMENTAL BELIEFS

The Program Review Team identified some fundamental beliefs that underlie their work. We share these with the readers to provide context for our recommendations:

- All stakeholders and staff care deeply about the education of D/HH and/or B/VI students and strive to better serve students and their families across the state. There are often differences in the philosophies of how to accomplish this goal.
- D/HH and/or B/VI students deserve an education that prepares them to compete in a global economy and participate meaningfully in a democratic society.
- Our review was an independent process. The team did not have an agenda and listened to all points of view in developing our findings and recommendations.
- The aim of this review was not to find fault or assign blame. The primary goal of our work was to improve the operation of CSDB and enhance student outcomes at the school and the outcomes for all D/HH and/or B/VI students, families and student services statewide.
- Some stakeholders believe that the needs of D/HH and/or B/VI students and their families are not being adequately addressed, and those stakeholders have shared their concerns publicly for almost 30 years with little impact. We believe that the state (CDE and the CSDB) must adopt a sense of urgency with regard to improving services and programs based on student, family and practitioner needs, and enhancing cooperation, communication and coordination among stakeholders.
- Coordination and collaboration among the CDE, CSDB, other state agencies, advocacy groups, nonprofit service providers and other stakeholders are necessary to ensure effective use of resources.
- Meeting students' individual needs and providing opportunities for individual student and parental choice are critical. This includes recognition that needs and choices may change over time.
- D/HH and/or B/VI students need access to a full continuum of educational options/strategies, services and programs to meet their individual needs and prepare them to have a variety of vocational and personal/social options in their lives.
- Closing CSDB is not a viable option at this time, even though some stakeholders have called for it. The state must develop an overarching plan for meeting the needs of D/HH and/or B/VI students across Colorado before considering fundamental changes to the role of the CSDB. Colorado has invested a great deal of state resources in upgrading the facility. More importantly, the school provides students with an educational experience within a deaf or blind culture that is not available in their home districts. Also, there is a cultural attachment — going back generations — between the school and some members of the deaf and blind communities. Improving services should be the goal. Any future changes in CSDB's role should be considered in that context.

Program Review
Colorado School for the Deaf and the Blind

August 2019

PROCESS FOR THE PROGRAM REVIEW

Over the past several years, external stakeholders have voiced a variety of concerns about student outcomes and operations at CSDB to the Colorado General Assembly's JBC. The JBC staff examined the issues raised by these groups about the operation of CSDB and the CDE's role in oversight of the school. As a result of that work, JBC staff recommended that the committee ask the CDE to contract for "an independent external financial and performance review of the operations, performance, and academic expectations and outcomes of the school." CSDB and the CDE acknowledged the concerns and the JBC staff's recommendation and agreed to contract for an independent program review. In a joint letter to the JBC, the then-superintendent of the CSDB, Carol Hilty, and Education Commissioner Dr. Katy Anthes stated that the aim of the review was "to examine and identify program strengths, program gaps (areas for focus/growth) and resource allocation." They also wrote, "The review will include program observation, a review of student data, interviews with staff, students and parents, as well as an opportunity for public comment." Dr. Elliott Asp, senior partner at the Colorado Education Initiative and former Interim Commissioner of Education and assistant superintendent in Douglas County and Cherry Creek Schools, was hired to facilitate the program review.

A Program Review Design Team (see Appendix A) was assembled in late November 2018 to design the review. The JBC staff, the Consortium of Colorado Directors of Special Education (Consortium) and several advocacy groups identified specific aspects of the program at the CSDB that they wanted the review to address. Based on that information and input from a Stakeholder Advisory Committee (see Appendix A), the Program Review Design Team identified six primary components for the review: on-campus instructional program; student academic outcomes; outreach program; early-intervention services; resource allocation and per-pupil spending; and oversight, accountability and transparency. A Program Review Team (see Appendix A) — composed of national and state experts in the education of the D/HH and/or B/VI, special education, Colorado school finance, student assessment and administration/governance — was convened in January 2019 (with some overlapping membership from the Program Review Design Team).

Indicators and sources of data were identified for each component. Besides the indicators identified by the Program Review Design Team and Stakeholder Advisory Committee, the Program Review Team utilized the frameworks in the National Association of State Directors of Special Education publication *Optimizing Outcomes for Students Who Are Deaf or Hard of Hearing: Educational Service Guidelines* (NASDSE, 2018) and the Association for the Education and Rehabilitation of the Blind and Visually Impaired publications *Accreditation Handbook for Organizations* and *Accreditation Standards* (AERBVI 2018) to guide the review of the instructional program, Outreach services and Early Intervention Program.

Program Review
Colorado School for the Deaf and the Blind

August 2019

From February 2019 to July 2019, the Program Review Team collected data from a variety of sources that included:

- Observations of every classroom in both the school for the deaf and the school for the blind;
- Focus groups with teachers, students and parents from both schools;
- Interviews with the members of the board of trustees;
- Interviews with CSDB instructional and administrative leadership;
- Interviews with CSDB Outreach and Early Intervention staff;
- Interviews with residential program staff and Employability Center staff and students;
- Interviews with leaders and members of a variety of advocacy groups, including Colorado Hands & Voices and the Colorado Association of the Deaf;
- An independent analysis of comments from public town-hall meetings in three locations across the state was conducted by the University of Colorado Denver's Center for Practice Engaged Education Research (C-PEER) (see Appendix B);
- An independent analysis of comments from an online, open-ended questionnaire through the CDE website was conducted by C-PEER;
- Interviews with senior CDE leadership;
- Survey of Colorado directors of special education, through the Colorado Consortium of Directors of Special Education (with a 75% return rate);
- Interviews with the director and staff of the Colorado Commission for the Deaf, Hard of Hearing and Deaf/Blind;
- Interviews with the leadership and staff members of the Rocky Mountain Deaf School;
- Interviews with the director and staff of the Independence Center in Colorado Springs;
- Review of CSDB student performance on the state assessment;
- Review of CSDB state School Performance Framework ratings;
- Review of organizational chart, staff positions and salaries;
- Examination of position descriptions, certification requirements and current staff qualifications;
- Review of the summary of the findings from the December 2018 CDE Supervision and Monitoring Visit; and
- Independent expert review of the function and accessibility of the CSDB website.

Program Review
Colorado School for the Deaf and the Blind

August 2019

Findings and Recommendations

ON-CAMPUS INSTRUCTIONAL PROGRAM

The review of the on-campus instructional program is divided into four sections:

- Education of D/HH students;
- Education of B/VI students;
- Residential Program; and
- Employability Center.

Data sources, findings and recommendations are presented for each section.

Education of D/HH Students

CSDB's on-campus instructional program for D/HH students serves 208 students (enrollment varies slightly across the year). The staff consists of two principals, 21 teachers, two speech and language pathologists, one communication specialist, one audiologist and six paraprofessionals. The school offers comprehensive educational services through a day and residential program for students who are D/HH. The Program Review Team identified three areas of focus for the review of the on-campus educational program for D/HH students: qualifications/experience of staff; differentiation for specific student needs; and using data to inform instruction.

The review team observed instruction in all classrooms, interviewed classroom teachers, school administrators and parents, and observed other components of programs offered through CSDB. Two consultants specializing in educating students who are D/HH focused on reviewing classroom instruction. One consultant is the program administrator for a large deaf-education program in a large suburban school district, while the second consultant has been a superintendent of a state school for the deaf and a special-education director for two local school districts. File reviews and other activities occurred over an eight-month period, but the on-site observation of instruction occurred Feb. 21, 2019.

All students at the school have been identified as deaf or hard of hearing and have an Individual Education Plan (IEP). Students were placed for educational services as a result of IEP team decisions and receive specialized instruction according to their IEP. Each student receives intentional instruction in core content areas based on the Colorado Academic Standards (CAS). The school also addresses language development, academic and social/emotional learning, and communication-access barriers or gaps. The team focused on

Program Review
Colorado School for the Deaf and the Blind

August 2019

how the instructional staff builds on each child's unique learning abilities — maximizing strengths and planning instruction to overcome weaknesses.

All observations, findings and recommendations are based on the effective practices for deaf education identified in *Optimizing Outcomes for Students Who Are Deaf or Hard of Hearing: Educational Service Guidelines* and *Deaf and Hard of Hearing Program and Service Review Checklist* (NASDE, 2018). The team also considered the accreditation standards from the Conference of Educational Administrators of Schools and Programs for the Deaf's *School Improvement Protocol* (CEASD, 2016) as they applied to the scope of our review and the on-campus instructional program.

Data Sources

Classroom Observations: Every classroom in the school for the deaf was observed by two experts in deaf education who are also administrators of programs for deaf students. Observations were scheduled by CSDB administration to provide a broad overview of the program. Each classroom was observed for approximately 20 minutes.

Focus Groups: Individual focus groups were conducted with students, parents and teachers from the school for the deaf.

Staff Interviews: The instructional leadership staff — which consisted of the director of curriculum and instruction, principals and teacher representatives — was interviewed by the entire Program Review Team.

Stakeholder Input: Additional data was gathered from a survey of the Colorado Consortium of Directors of Special Education, input from the town-hall meetings and an accompanying online questionnaire, as well as interviews with CDE personnel and members of advocacy groups.

Findings

General findings from the classroom observations and the focus groups are described separately below. The data from the staff interviews and input from other stakeholders are included in the sections on the qualifications/experience of staff; differentiation for specific student needs; and using data to inform instruction.

Classroom Observations: Preschool

The preschool class was very strong in design, instruction and content. The speech and language pathologist and teacher provided access both in ASL (language of instruction) and spoken English. The lesson was well planned and students appeared to understand the lesson activities and expectations for them. There was a coordinated set of activities that focused on vocabulary and language development through a reading activity while the teacher read a story. The teacher used a tracker board for activities and

transitions to sequential activities. The activities transitioned smoothly from one activity to another. The classroom was well organized, and the physical layout was conducive to a center-based approach.

Classroom Observations: K-12

The K-12 school for the deaf's facility is well designed and the classrooms are spacious. Class sizes ranged from eight to 16 students (accounting for absences). The primary language of instruction was ASL. All students were reportedly on IEPs. No IEPs were provided or reviewed during our on-site observations. In some classes, it was evident that instruction was based on individual student IEP goals, but in other classes, the dominant mode was large-group instruction. While several classes reportedly were following a scope and sequence with goals and outcomes posted for students, many of the observations and descriptions did not demonstrate any cohesive scope and sequence that provided continuity of instruction and a schoolwide plan of instruction to promote individual student academic growth. In several classrooms, students could easily identify the learning objectives for the class and their individual learning goals. However, in most classes, this was not the case. No evidence of a schoolwide curriculum and coordinated approach to instruction was evident. In some classes, it appeared that instruction was in the form of a random group of activities.

All students appeared to have access to the language of instruction (ASL). However, we did not observe any instruction in ASL linguistics. This could be due to the limited time we spent in each class, but we did observe every classroom and saw no evidence of instruction supporting linguistic development of ASL skills.

While many of the students were using spoken English, students did not have access to this mode of communication in any of the classrooms we observed.

Most classrooms demonstrated a positive learning environment.

The literacy specialist was very skilled at delivering differentiated instruction and engaging all students in his classroom lesson. There was a clear range of ability in his group of students, and he met each student at his/her academic level. Students were visibly engaged and excited to be learning.

Drop Everything and Read (DEAR) was observed in several settings, but this did not appear to be implemented in a strategic manner. It seemed that DEAR was used as a "fill-in" strategy when there was a break in instruction.

Parent Focus Group

The Parent Focus Group included parents of K-12 students. Parents had chosen to place their student(s) at CSDB and were generally supportive of the school. They felt like their students were supported and the instructional program provided unique opportunities for growth for their child. Many parents reported very positive interactions and support from their designated family advocate.

However, satisfaction with staff interaction with families varied greatly, particularly in terms of “feeling heard” and/or valued. Parents attributed a major problem — their inability to communicate with the staff — to high annual turnover and, without notice to families, changes in the roles of veteran staffers. Parents could experience, for example, a strong connection with a staff “advocate” one year but not the next. The effectiveness of the advocate (and other roles that provided student/parent support) seemed to be largely dependent on the length of tenure of the teacher and her knowledge of options and instructional practices, as well as educational resources and other resources available at the school. New teachers, while often very knowledgeable about D/HH education in general, did not have an adequate understanding of how the system worked at CSDB.

Parents also said the high turnover rate negatively affected family/school relations and directly impacted their children’s academic progress. Programs and services seem to change from year to year without a sound rationale grounded in student needs. For example, parents would hear: “*This year*, this is how we are tracking information.” There seemed to be a new way of doing things every year for the past several years.

Student Focus Group

The Student Focus Group was made up of high school students. Most students chose to communicate using ASL, but some used spoken English. These students said they felt a sense of belonging and community at CSDB. They were appreciative of the strong deaf culture at the school and indicated that they have grown socially as a result of attending CSDB and were more connected and involved with school than they could be at a mainstream setting in their home districts.

As with the Parent Focus Group, students also felt that teacher turnover was a significant challenge that impacted continuity of instruction. Students indicated that the high turnover rate had a significant negative effect on the quality of their education. They expressed the concern that the high staff-turnover rate resulted in their having to “start over” in terms of instruction every year.

Qualifications and Experience of Staff

Findings

Staffing data supplied to the review team by the CSDB indicate that 40% of the current staff are new to the profession and that has been a consistent trend over time. The table below shows that although the current staff may hold a license from the CDE that allows them to be employed, some are not licensed/trained to work effectively with students who are D/HH.

Certified Staff Qualifications for the D/HH Program
<ol style="list-style-type: none">1. Staff with Emergency Authorization:<ol style="list-style-type: none">a. PE teacher (School for the Deaf)2. Staff with Temporary Authorization:<ol style="list-style-type: none">a. Science teacher (School for the Deaf)b. Teacher of the D/HH: ASL (School for the Deaf)c. Teacher of the D/HH: pre-sixth grade (School for the Deaf)3. Principal, grades 7-12: no endorsement for D/HH (School for the Deaf)4. Principal, pre-sixth grade: (new to the state) no certificate in Colorado; no endorsement for D/HH; applying for a principal's license5. Eight of 20 on the teaching staff in the School for the Deaf have "initial teacher" licenses

From the classroom observations, it was evident that there was great variability in instructional expertise. School administrators were able to articulate and demonstrate knowledge of best practices in deaf education. However, there was a lack of guidance offered to instructional staff in the use of best practices. This was certainly impacted by staff turnover. For example, one principal had been on the job for only a few weeks at the time of the observation and was still in the process of obtaining her administrator license. An apparent lack of connection between “knowing what to do” and application of that knowledge was evident from our classroom observations.

Both veteran and new staff indicated they felt overwhelmed with the expectations and responsibilities of the duties required of them. Similar concerns were expressed in both the Parent Focus Group and the Student Focus Group. There appears to be a need to improve the organizational structure for providing instructional support and to clarify the responsibilities/expectations of staff outside of classroom instruction.

Stakeholders who attended the town-hall meetings and/or responded to surveys generally supported the school and felt it provided a strong sense of community for students. Every group was also clear that there were areas where the school could improve. This was perceived as a healthy balance of school pride and an honest examination of places to learn and grow. Stakeholders were also concerned about turnover and its impact on instructional quality and the continuity of staff-family relationships.

Recommendations — Immediate Improvement

- Develop and implement a program to recruit and retain qualified teaching staff (in both content areas and pedagogy) with the goal of reducing staff turnover. This should be done in collaboration with ESSU staff and the Consortium of Directors of Special Education.
- Conduct exit interviews with all departing staff to identify why they left and what could have been done to encourage them to stay.
- Improve mentorship, coaching and support-network opportunities for new staff based on feedback from new and veteran teachers.

Recommendations — Long Term

- Revise the induction program so that new staff can earn the appropriate certifications and improve their instructional capacity as part of the program.
- Incorporate a plan/timelines for completion of certifications and licensures into the evaluation process.
- Partner, in coordination with CDE and the Consortium of Directors of Special Education, with the University of Northern Colorado and other higher-education institutions that train teachers of the D/HH to develop an “internship” program at CSDB. The goal would be to create a “pipeline” of qualified candidates for CSDB and other AUs across the state.
- Conduct an annual climate and culture survey with staff, parents and students, with a focus on determining the reasons for high staff turnover.

Differentiation for Specific Student Needs

Findings

Based on the review team’s classroom observations and teacher interviews, there appears to be an effort to individualize classroom instruction. However, the level of implementation varies greatly from class to class. Instruction was appropriately provided in ASL, but direct instruction in pragmatics, syntax and the semantics of ASL was not observed.

There is a wide range of communication methods among students beyond ASL. For example, some students use spoken English and spoken Spanish in the classroom, as well as when interacting with peers and staff in different settings. Students who use modes of communication other than ASL should be able to have their needs met. Providing clearly delineated instruction and use of language allows students the opportunity to develop strong language skills. Students can “code switch” naturally between intact

language systems to access communication. There is a need to focus more on instructional practices that address each student's communication and literacy needs.

Students' social-emotional development and mental health impact the ability to learn. No comprehensive use of a system of student behavioral support was observed. Based on the team's observation of artifacts posted on classroom walls, in the hallways and in the gym, there was little evidence of positive behavior intervention support (PBIS), mission/vision or a schoolwide emphasis on academics.

Support for deaf culture was a significant strength. Students, families and community members expressed strong D/HH beliefs and took great pride in their school. However, some participants in the Parent Focus Group felt that racial and ethnic aspects of cultural differences within the school received little attention or support.

Interviews with instructional leadership staff indicated they had a clear understanding of evidence-based practices and the use of student data to guide instruction, but there was not a schoolwide approach to using data to drive specially designed instruction. Differentiation was observed in some elementary and secondary classrooms, but the team did not see evidence of a consistent approach for using assessment to monitor individual student progress and inform instruction. The Program Review Team did observe a degree of horizontally aligned instruction across preschool, literacy and secondary settings. With some notable exceptions (e.g., chemistry, math and social studies at the secondary level and in some elementary classrooms), there was not an overt connection between a larger vertical curriculum and classroom activities. In some classrooms, activities seemed to be thematic but not connected to an overall curricular plan.

In some classrooms, student expectations were clearly posted and there was a clear connection between classroom activities and student-learning outcomes. While most classrooms were inviting and friendly, students did not appear to be actively engaged in learning. Rather, their focus seemed to be on getting to the next activity or class. In most cases, the DEAR program seemed to be disruptive and not coordinated, which had a negative impact on student engagement.

The Student Focus Group reported what it perceived to be a common practice at the secondary level: having to review material that had already been covered whenever a new student joined the class. Based on observations, the Program Review Team questioned whether differentiation and individualized instruction were commonly in place.

Instructional leadership staff also noted the need to examine the pullout model for providing supports to particular students (e.g., speech/language services) to determine whether those services would be more effectively delivered using a different approach. They also wanted to consider utilizing staff in the residential program to provide extended learning opportunities. The Program Review Team supports this step in order to maximize resources and increase focus on integrating support for individual student needs.

Each student has an individual Communication Plan. The Program Review Team did not observe the use of any additional amplification technology other than personal hearing technology, except in preschool.

Families living in relatively close proximity to the CSDB campus report being very involved with the school. Parents whose children attend the residential program and live outside the Front Range struggle with being able to attend events and become connected with the school. The CSDB's Outreach Program does provide parents with training opportunities that they can attend either in person or virtually.

From the Program Review Team's classroom observations and from feedback from stakeholder groups, it was difficult to determine whether CSDB decisionmakers are aware of all available placements in the state. It was also unclear how compliance measures are addressed or how the recommended placement is determined and implemented with fidelity. It appears that there is not a plan for addressing educational and services delivery placement options.

The parent and teacher focus groups identified a need for the development of a strong relationship between CSDB and the CDE. Additionally, local school districts, other stakeholders and agencies responsible for the delivery of services to children who are D/HH and their families must have a strong understanding of the services offered both on campus and at the local level. A strong partnership between CSDB and the CDE is needed to ensure appropriate services and supports are in place statewide, as well as at the CSDB campus.

When looking at the entirety of the programming that CSDB offers, it was also important to consider the needs from state stakeholders. According to the consortium survey, directors of special education across the state consistently reported their high value for on-site instruction and support for students with significant and specialized needs. They view CSDB as a critical component of a continuum of services for students with hearing and vision challenges whose needs cannot be met in their local school district/AU. The consortium survey also revealed that directors of special education view as a CSDB strength the opportunity for students to interact with like peers and with adults, creating a community culture and greater opportunities for authentic communication. Also, resources unavailable in many districts across the state include the provision of intensive language and skill development; specialists to meet the individual needs of students; and technological support for students to experience different modes of communication and learning.

Recommendations — Immediate Improvement

- Provide all students and their families who attend or are served by CSDB access to the full range of communication methodologies/options available for them in any public school in the state. All forms of access to language should be made available and supported by CSDB.
- Base instructional activities on individual student needs as reflected in their IEPs and data from formative assessment processes.
- Add additional specialists in literacy and math instruction, behavior support and/or instructional coaching by reallocating some administrative positions.

Program Review
Colorado School for the Deaf and the Blind

August 2019

- Ensure that teachers are aware of grade-level expectations for student work based on CAS.
- Develop a schoolwide implementation plan for the DEAR program.
- Improve communication and collaboration with school districts regarding student progress, including expectations for if/when a student should return to the school district and then partnering for successful transition in or out of CSDB.
- Provide greater transparency and clarity about admissions criteria.

Recommendations — Long Term

- Develop a continuum of services to meet individual student needs. This should reflect the choices of access to language and communication modes available to parents of children who are D/HH.
- Develop a system that provides for “push in” support from related service providers. A highly collaborative teaching and learning design with related personnel (e.g., audiologists, and speech and language pathologists) could increase the individualization and variety of specially designed instruction for each student throughout their schoolday.

Using Assessment Data to Drive Instruction

Findings

Based on interviews with staff, it appears that utilizing assessment data to inform IEP development and instruction has been an increasing area of focus. It was reported that assessment workshops for teachers are provided by a CSDB administrator over the course of six weeks, reviewing assessment data from the previous year, with subsequent Professional Learning Community (PLC) work that includes analysis of student achievement. Other supports for teachers include assigned mentors. A reported challenge currently in this area is the number of new teachers and there are only two qualified staff who can provide mentor support.

The director of curriculum and assessment has created student-achievement binders, with summaries for schoolwide data, and assessment results by grade level, teacher level and detail at the individual student level. It was reported that this data is shared through PLC work, resulting in increasing awareness of the importance of using data to plan and deliver instruction. This information reportedly is being used for the Unified Improvement Plan (UIP). It was also reported that weekly principal team meetings include review of assessment data, with a focus on content areas needing attention, at the individual student level. Principals subsequently are expected to focus on student-achievement data with teachers. A helpful strategy has been to remove grade levels and student names from assessment data to increase candid conversations among teachers with a focus on potential changes to instruction and supports for individual students. There are also efforts to help students track their own growth.

For students demonstrating limited growth, instructional leadership staff reported that Multi-Tiered Systems of Support (MTSS) were being implemented in the 2018-19 school year. Examples include color coding students who achieve below grade level and requiring supplemental instruction for individual

students in the skill and content areas of need. However, some teachers view review of assessment data and using it to inform instruction as “one more thing” for them to do, rather than critical to improving student academic outcomes. Our interviews with some members of the instructional leadership staff indicated a critical need for principals to have a strong background in formative assessment practices and using data to inform instruction and provide feedback to students. Some administrators need additional training in this area in order to lead this work with teachers.

Recommendations — Immediate Improvement

- Develop in-depth, ongoing professional development for administrators and teachers in the analysis of student-achievement data and how to use it to inform instruction with a focus on individual student needs.
- Restructure the role of the instructional and curriculum director to focus on the supervision of school principals and ensure that evidence-based practices are in place in every classroom.
- Increase academic rigor and expectations for students, commensurate with other Colorado school districts and grade-level expectations for students based on CAS.
- Make student engagement and ownership of learning a priority and implement schoolwide strategies to support that aim (e.g., student-led conferences, standards-based grading), as well as provide training for staff.

Recommendations — Long Term

- Align curriculum and instructional materials vertically and horizontally across subject areas and levels and provide teachers with samples of student work that exemplify grade-level expectations for students based on CAS.
- Work with staff to increase the level of academic language used with students.
- Provide professional development focused on the use of scaffolding and differentiated instruction based on grade-level expectations from CAS.

Education of B/VI Students

The CSDB on-campus instructional program for the blind serves 63 students. The staff consists of one principal, 15 teachers, six related-services staff, eight paraprofessionals and one braille transcriber. The school offers comprehensive educational services through a day and residential program for students with visual impairments.

The instructional context at a specialized school for the B/VI is complex because students must be instructed in general education grade-level curricula to meet high academic standards in the core curriculum and instructed in nine areas of the expanded core curriculum, which focuses on the unique learning needs of students who are B/VI. In addition, even though the students at a school for the B/VI are

similar in their unique learning needs because they all have a visual impairment, they are also highly diverse in their individual educational needs requiring individualized and specialized instruction.

Each student must have the opportunity to access and participate in general education grade-level curricula and each student must have the opportunity to access and participate in the expanded core curriculum. Each student must have individual learning goals, specially designed instruction to make progress toward individual learning goals, adapted curriculum for those learning goals, and appropriate accommodations for accessible materials, tools and technology in their primary learning medium, which is the learning and literacy media (e.g., print, large print and braille) used to facilitate learning. All teaching and learning activities must focus on each student's primary learning mode and communication needs (e.g., braille, print and, in some cases, auditory), especially in literacy and numeracy instruction.

A highly qualified and experienced teaching staff with specialized knowledge and skills to meet the instructional needs of a diverse student body in the core and expanded core curricula is fundamental to delivering this instruction. The teaching staff must be competent in braille and effective instructional strategies in literacy and numeracy to instruct all students in their primary learning medium.

The review of the on-campus instructional program for B/VI students focuses on the qualifications and experience of the staff; differentiation for specific student needs; provision for diverse access needs; and access to grade-level content.

Data Sources

Classroom observations were conducted by two members from the Program Review Team: the consultant for students with visual impairments and a special-education administrator. An observation schedule was developed by CSDB administration, which included 13 10-minute observations in the following classroom settings: preschool, elementary math, math for students with additional learning challenges, students with significant need for educational support, high school physics, high school combined social studies and English courses, individual braille instruction for a D/HH student, career/college readiness, keyboarding, physical education, elementary art, and high school daily-living activities. The observations were designed to provide an overview of the instructional context at the School for the Blind and focused on student access and participation in teaching and learning activities in the broad areas of learning environment, instructional supports and instruction.

A Teacher Focus Group was conducted by three team members: the consultant for students with visual impairments, a school district special-education administrator and the team facilitator. Seven teachers participated, representing all grade levels (preschool, elementary and secondary) and a range of subject areas and classrooms (math, social studies, science, English and supported secondary). The tenure of the teachers who participated ranged from seven months to seven years. Four teachers were in their induction/probationary period (less than three years).

A Parent Focus Group was conducted by two team members: the consultant for students with visual impairments and the Coordinator for Consortium of Special Education Directors. Two parents participated.

Program Review
Colorado School for the Deaf and the Blind

August 2019

Their children were mid-level students who are blind and attend the day school (non-residential). One child had attended CSDB for eight years and the other child for four years.

A Student Focus Group was conducted by two team members: the consultant for students with visual impairments and a school district special-education administrator. Six high school students, representing grades 9-12, participated. They had attended CSDB anywhere from three to 11 years.

Qualifications and Experience of Staff

The following information was shared by CSDB regarding teaching staff and policy:

- CSDB Teacher Credentials, Feb. 14, 2019.
- CSDB Policy GBF: Staff Braille Competency, revised by the Board of Trustees, April 12, 2012.
- CSDB Position Descriptions — Certified Teaching Staff, no date.
- CSDB Position Descriptions — Educational Program Administrators, etc., no date.
- CSDB Teacher Credentials: Staff who provide educational services to students who are B/VI, May 21, 2019.

Findings

The capacity of the teaching staff, leadership and support staff at the School for the Blind to collaboratively create and maintain a positive, respectful, and supportive learning community and environment for all students is clearly evident. Parents, students and colleagues shared information that reveals a highly respected and valued learning community. The teaching staff at the School for the Blind is clearly committed and dedicated to instructing the students in the teaching practices as described in the introduction. It is noteworthy and a strength that the principal at the School for the Blind is a qualified, licensed teacher and has a certificate of Braille Competency. It is also evident that the teachers work with a spirit of great concern for their students and exhibit strengths in areas, such as supportive interactions with students; positive methods to manage student behavior; a variety of materials, tools and technology; small-group instruction; and integration of the expanded core curriculum into daily teaching activities.

It is also important to note that the directors of special education across the state consistently reported a high value for on-site instruction and support for students with significant and specialized needs. The directors view CSDB as a critical component of a continuum of services for students with vision challenges whose needs cannot be met in their local school district/AU.

However, a review of the teaching staff in four areas — licensure, endorsements, braille competency and experience — reveals concerns in the area of qualifications and experience of the teaching staff at the

School for the Blind. The qualifications and experience of the current teaching staff — as of May 21, 2019, and based on 15 teachers — are illustrated in the table below.

Area	Data
Licensure	<ul style="list-style-type: none"> • 60% are professional teachers • 40% have other status (alternative, initial, temporary)
Endorsements	<ul style="list-style-type: none"> • 40% are VI endorsed • 13% are endorsed in core curriculum areas (math, social studies) • 27% are endorsed in non-academic curriculum areas • 20% are elementary endorsed • 20% are special education endorsed
Certificate of Braille Competency	<ul style="list-style-type: none"> • 27% certified • 40% working toward • 33% N/A
Experience	<ul style="list-style-type: none"> • 40% 1-3 years • 47% 4-10 years • 13% +10 years

The state license qualifications of the teaching staff reveals that 60% of the teaching staff have a professional teaching license and 40% have a different licensure status, such as alternative, initial and/or temporary. It is a critical concern that 40% of the teaching staff are not licensed as professional teachers in Colorado.

Four teachers (27%) have endorsements in non-academic subjects, such as media, music, physical and business education. It is a strength that teachers are endorsed in these general-education subject areas. Two teachers (13%) have endorsements in general-education core subject areas, such as math and social studies. Given the overall concern by stakeholders regarding student access to general-education grade-level content, it is a critical concern that only two teachers have endorsements in core subject areas.

Three teachers (20%) have endorsements in elementary education, and three teachers (20%) have special-education endorsements. A brief examination of endorsements in elementary and special-education areas in the state of Colorado seems to indicate teachers endorsed in these areas would have knowledge and skills in teaching reading and math content, which would indicate that at least 40% of the staff have this

content knowledge. Given the student-testing outcomes, yearly progress in reading and math, and concerns regarding student results, this is a critical instructional focus area for all students. It is not clearly evident whether teachers are highly qualified in teaching literacy and numeracy content.

In the area of braille competency, it was determined that 33% of the teaching staff do not need braille competency, 27% of the staff are certified in braille and 40% are working toward braille certification. Given the high incidence of students using and learning braille at the School for the Blind, it is a concern that only 27% of the teaching staff has a Certificate in Braille Competency. The CSDB Policy on Staff Braille Competency describes a Model of Excellence, which seems to indicate that a higher percentage of staff should be competent in braille than what is currently the status.

The experience of teaching staff reveals that 13% of teachers have more than 10 years of experience at the School for the Blind, 47% have four to 10 years of experience and 40% have one to three years of experience. Experience is a critical variable in teacher competency, and it is concerning that the School for the Blind has 40% of teachers in their induction phase of teaching (first three years) and 40% of the teaching staff are beginning teachers. Teacher retention needs to be improved.

Related-services staff are integral to meeting the needs of students with visual impairments at a specialized school for the blind. Related-services staff includes professionals, such as orientation and mobility specialists, speech and language pathologists, occupational therapists, and physical therapists. At the School for the Blind, there are six related-services staff: two orientation and mobility specialists, one speech and language pathologist, one occupational therapist, one physical therapist, and one school psychologist. The qualifications of related-services staff were reviewed in two areas: licensure and experience. That revealed a strength in the qualifications of the related-services staff. The qualifications and experience of related-services staff at the School for the Blind — as of May 21, 2019, and based on six staff members — are illustrated in the table below.

Area	Data
Licensure	<ul style="list-style-type: none"> 100% of related-services staff are appropriately licensed
Experience	<ul style="list-style-type: none"> 33% 1-3 years 50% 4-10 years 17% +10 years

It appears that the related-services staff, as a group, is qualified and experienced.

Although paraprofessionals were not a focus of this review, it was reported that the program for B/VI students has eight paraprofessionals. Three paraprofessionals “float” and five paraprofessionals are assigned to specific students. The latter five are commonly referred to as 1-1 paraprofessionals. The role and function of paraprofessionals were not specifically examined, but paraprofessionals are critical support staff for student instruction. Because of the overall concerns regarding effective instructional supports for

students, the knowledge and skills of paraprofessionals are concerns. For example, how can paraprofessionals support overall increased student independence and how can they assist in instruction in areas such as braille and braille technology?

Another area where support staff for students is fundamental to effective services to students who are B/VI is qualified braille transcribers. There is one certified braille transcriber employed for the students at the School for the Blind. Given the number of students who use and are learning braille and other conditions revealed in the sections below, it is highly unlikely that one certified braille transcriber can meet the daily instructional need for braille at the School for the Blind. It is a concern that appropriately certified braille transcribers be available to support teachers and students in reading, math, and access to general-education curriculum and modified curriculum.

Recommendations — Immediate Improvement

- Recruit qualified teaching staff and retain qualified and experienced teaching staff.
 - Explore and implement new partnerships to increase recruitment strategies.
 - Create and implement innovative and robust induction supports for unqualified teachers/staff. Mentorship and coaching supports should be systematic and aligned with best practices.
 - Examine and align program improvement goals and professional-development activities to focus on staff retention to support increased student results.
- Create and implement rigorous supports to certify new teachers in braille competency.
- Increase certified braille transcribers for the School for the Blind. Include appropriate certifications in non-technical materials, technical (such as math and science), textbook formats, tactile graphics and material for young children.

Recommendations — Long Term

- Conduct a critical analysis of the teaching positions, related-services staff and paraprofessionals, and then research/examine a variety of approaches to hire and maintain qualified and experienced teachers to meet the instructional needs of students.
 - This would include a critical examination regarding who should be endorsed as teachers for students with visual impairments, who should be qualified in core subject areas and who should be competent in braille.
 - Administration should consider realigning staff to increase student access to curricula, access to braille, access to accommodations and modifications, and access to technology. This should include the role and function of paraprofessionals.
 - Increase collaboration among all teaching staff, related-services staff and paraprofessionals to increase effective instruction to all students.

Differentiation for Specific Student Needs

Findings

This section reviews differentiation for specific student needs in the following two areas: learning environment, and instruction and instructional supports. The learning environment includes the physical and instructional environments.

The overall campus provides a learning environment conducive to implementing a broad curriculum for students of all ages, and differentiation for individual student needs was observed in several contexts. The campus is favorable to independent student travel, as demonstrated by the navigation and travel skills of the students. There are adaptations to the physical environment, such as specialized and flexible lighting in a classroom to provide for students' varying visual conditions and functioning and an audio system for announcements. The physical-education building is a well-equipped facility with extensive equipment to provide for the individual needs of students. The variety of buildings on the campus provides opportunities for individualized programming in instruction in the expanded core curriculum, such as apartment living and cooking skills.

The overall learning environment also provides a setting for students to learn in small class sizes, small groups and a low staff-to-student ratio, enhancing the opportunities for differentiated instruction. These factors also seem to contribute to a highly supportive learning community where students and staff experience a strong sense of belonging and acceptance. Interactions between staff and students are supportive, kind, interactive and positive. The interactions between peers also seem supportive and positive.

To understand the instructional context for B/VI students, it is important to consider some student variables. The student population at the School for the Blind is a diverse student body with a variety of visual conditions and visual functioning, learning media plans and instructional needs. The on-campus student enrollment at the School for the Blind in pre-K through 12th grade on May 31, 2019, totaled 63. (Three students were being served off campus in homebound services and were not counted as on-campus students.)

A key variable in understanding the foundational student needs in instruction is a student's primary learning medium. A student's primary learning medium is defined as the one a student uses for learning and literacy activities, such as braille, print, and/or large print. Auditory media are included for students with significant disabilities where braille or print is not an effective medium. Understanding the students' primary learning medium at the School for the Blind provides a basis for understanding the instructional context.

The primary learning media for the students at the School for the Blind is the following: 67% of students use or are learning braille, 43% of students use braille as a primary learning mode, 43% use print as a

primary learning mode, and 10% use auditory as a primary learning mode. (Students, by the way, often have a secondary learning medium.)

The fact that 67% percent of students are using/learning braille and that 43% of students are using braille as a primary learning medium is a substantial instructional factor. One can assume that the students using/learning braille represent a range of age/grade and ability levels affecting the amount and level of braille reading and writing. For example, some students may be emergent readers and are learning tactile skills and the braille alphabet. Other students may participate in advanced courses and require high-level reading materials in three to five courses. Other students may have additional disabilities and use braille to supplement other learning modes, such as auditory and/or print. This incidence of braille use is a significant statistic when considering the factors influencing the need to develop literacy and numeracy skills and provide access to educational curriculum and programs. These factors include knowledge and skills of teachers in braille and braille instruction; support personnel who are competent in transcribing braille; and the amount of adapted/alternate materials, tools and technology needed by students. It is the basis for differentiating instruction.

Effective instruction and instructional supports were evident in many contexts to support differentiation and specially designed instruction with students. There seemed to be an overall effort to manage students through positive behavioral supports and common strategies likely to encourage student participation and engagement, such as using routines and procedures, small groups and incentives. The following examples illustrate effective strategies used in instruction: developmentally appropriate teaching practices with some students requiring intensive instruction and interventions; a variety of multisensory approaches to support student engagement, such as using tactile symbols for communication and literacy; use of a variety of adapted materials, tools and technology; and participation in a variety of learning modes.

It could be said that all instruction at a specialized school for the blind is “specially designed” because it is driven by the IEPs for each student, and each student at the CSDB campus for the blind has an IEP. Given this context, the limited use of individualized and specially designed effective instruction demonstrated in classrooms is a concern. There was significant variation in the amount and degree of differentiating instruction to individual students. When whole group lessons occurred in classrooms, differentiation and scaffolded instruction were not always evident. Instructional effectiveness was not always evident with individual students in the areas of the learning environment, direct instruction to students and instructional supports.

The classroom environment at the School for the Blind is a concern regarding overall student independence and student access to instruction. The general arrangement of classroom space promoting student access and participation in instruction and educational programming is concerning. For example, the arrangement of physical space in classrooms to maximize movement and independence of non-ambulatory students is not always conducive for efficient access. The size and height of furniture used by young students and non-ambulatory students to access instruction and learning materials are not always appropriate. Students with low vision in wheelchairs and who need access to screens need the flexibility to get visually close to screens. Individual student workspaces (e.g., desk areas) are not always arranged for immediate student

access to braille reading and writing materials without the need to retrieve materials from another location, which interferes with instructional/learning time.

Literacy and numeracy instruction and use of literacy/numeracy materials and tools in the students' primary learning medium, especially braille, were not evident in many classrooms. Even though a variety of multisensory approaches to support literacy were observed — such as the use of a range of adapted materials, tools and technology, and participation in a variety of learning modes — there were limited opportunities for students to read in their primary learning mode during classes.

The small class sizes and staff-to-student ratios support a positive school climate, but such conditions should also support effective implementation of differentiated instruction. The roles and responsibilities of staff in the classrooms, such as paraprofessionals, did not always seem to support differentiated instruction. For example, a frequent instructional style in classrooms was whole-group instruction, during which the students were all engaged in the same teaching and learning activity. Paraprofessionals frequently sat immediately next to or near students (with little interaction) as the teacher directed instruction. There were several adults per classroom, and some were engaged in activities with students and others were just in proximity of students and not engaged with the students.

Also, the presence of related-services personnel was not apparent. A highly collaborative teaching and learning design with related personnel (e.g., orientation and mobility specialists, occupational therapists, and speech and language pathologists) could increase the individualization and variety of specially designed instruction for each student throughout their schoolday.

Recommendations — Immediate Improvement

- Increase reading and math instruction in the students' primary learning media throughout their schoolday and differentiate instruction for specific student needs with an emphasis on the instructional needs of students using and learning braille.
- Decrease use of oral instruction and increase instruction using braille and accessible print learning media for students with all ability levels.
- Increase student engagement with braille and print reading, as well as math strategies and activities.

Recommendations — Long Term

- Consider a critical review and an in-depth analysis of the physical environment, classroom space and individual student learning/work areas. Redesign the physical environment to increase overall student independence, access to materials and tools, and efficiency in participation in educational programming.
- Evaluate the roles and responsibilities of paraprofessionals in assisting with specially designed instruction, student independence and meaningful engagement.
- Consider a systematic process for training and managing the work of paraprofessionals with ongoing supports.

- Evaluate the service-delivery design with related-service personnel and consider a highly collaborative model, which supports students in the authentic learning environment with increased differentiated instruction.

Provision for Diverse Access Needs

Findings

The previous section, “Differentiation for Specific Student Needs,” is the basis for providing diverse access to educational programming and curricula for students with visual impairments. Individual student access needs are critical in the education of students with visual impairments.

Essential to this discussion is the primary and secondary learning modes that students require for teaching and learning. According to Individuals with Disabilities Education Act’s Section 614(d)(3)(B)(iii), braille is the primary learning mode for a student who is visually impaired unless an evaluation determines braille is not needed by the student. Each student at CSDB has a learning-medium plan with a primary learning mode (with 67% of students using or learning braille), which establishes the foundation for how each student should access and participate in instruction.

Adapted materials, tools and technology are essential for most students with visual impairments to equitably access and participate in instruction, and there are many of these items available at the School for the Blind. There are many students using a variety of tactile supports, such as tactile materials for communication, braille worksheets for literacy instruction, raised-line graphic tools, manual braille writers and several SMART Braille writers for writing. Students who need visual/print supports and accommodations use easels and video magnifiers (i.e., electronic tools with magnification). Students who use auditory supports access content on laptops with speech output. Adapted keyboards for computers are used. Many “hands-on” materials, manipulatives and concrete objects are used in teaching and learning activities. A science class used an active project-based learning design to learn physics concepts. In many classes, students often engaged in writing and notetaking activities with manual braille writers and computers. In an art class, each student was highly engaged using individualized accessible and adapted materials in their primary learning medium, and students had the opportunity to directly engage in the steps in a cooking lesson.

Providing this intensive level of adapted materials, tools and technology requires significant instructional supports in areas such as planning, acquiring, managing and delivering instruction. Many instructional supports are necessary to provide equitable and appropriate access to the curriculum for students with visual impairments in each student’s primary learning mode. These supports include specially trained personnel, such as brailleists, orientation and mobility specialists, and technology-support personnel. It is a concern that appropriate instructional supports are in place to plan, acquire, manage and deliver adapted materials to provide accessible instruction to students.

From the classroom observations, it appeared that the primary method used by staff to deliver instruction during classroom lessons was oral. This created an environment in which student engagement was an oral/auditory format without reading materials available in either braille or print formats. Few braille/print books and materials were observed in classrooms. The instructional design used by many teachers did not include access to reading activities in the classroom. Tools and technology to participate in reading digital books and documents were not apparent during instruction. The use of tactile graphics was not apparent, except in an art class. Tactile symbols used for communication with young students who were blind were based on print symbols, not braille symbols.

Many students did write and take notes using manual brailers and laptops, but there was limited use of braille materials and braille technology in classrooms, except when there were direct braille literacy lessons in an elementary classroom. There was limited use of accommodations for students with low vision when teachers used print in lecture formats to deliver content.

The overall instructional design used in most classrooms did not emphasize student access to content through use of braille/print materials in each student's primary learning mode during classroom instruction. The consortium survey included the recommendation that intensive braille-skill development for students is a priority. Oral/auditory instruction and supports should be a supplemental method, rather than the primary method, to deliver instruction and access to content during classroom instruction with the recognition that some students with significant disabilities may primarily access instruction through the oral/auditory learning channel.

Student engagement in reading is related to access to reading materials and content in a student's primary learning medium. Classroom instructional design did not emphasize student engagement with reading activities. Instruction such as in the form of a lecture should be accessible to all students. If teachers use whiteboards, PowerPoint and any print displays to communicate teaching and learning content, students need access in their primary learning medium. In early-literacy instruction, tactile/braille materials were not emphasized. For example, use of tactile symbols should be based on braille symbols, not print symbols. When adapted materials are used, each student should have their own materials rather than sharing materials with others.

Although the use of braille technology was reported in focus groups, the observations revealed limited use of it. SMART Brailers were used, but other kinds of electronic brailers, braille notetakers and refreshable braille devices used with computers were not evident during classroom instruction. During classroom instruction, it was not apparent whether students have individualized access to the variety of tools and technology needed to participate efficiently in teaching and learning activities and content. It was not apparent whether students are using technology to access digital books and content, as well as electronic files for reading and writing and for sharing with teachers.

It was not always apparent how communication occurred between sighted and visually impaired students and teachers. How do teachers access students' braille writing on manual braille writers? How can use of

technology tools increase communication between students and teachers? Use of technology to facilitate immediate and efficient communication was not evident.

Essential to this discussion are the supports available to teachers to provide instruction in a student's primary learning mode, especially braille. One braille transcriber is available to School for the Blind teachers, who also have support from the Colorado Instructional Materials Center. Based on the lack of braille materials present in the instructional environments, one brailist is not adequate to meet the needs of the students using braille.

Recommendations — Immediate Improvement

- Increase the use of literacy and numeracy materials, tools and technology in the students' primary learning media throughout the schoolday, with a focus on the needs of students who are using and learning braille.
- Decrease the emphasis on oral instruction and increase access through braille and print instruction.
 - Increase access to instruction using braille and tactile materials.
 - Increase access to print materials, especially if displayed at a distance.
- Increase use of materials, tools and technology to both provide increased student access, participation and independence in classroom instruction, especially braille technology, and to support written communication between sighted and braille users.

Recommendations — Long Term

- Conduct a critical analysis to determine the amount of support needed to provide effective braille instruction and access to braille materials in all curriculum areas.
 - Discern the needs of students with all ability levels. Provide modified curriculum materials in braille and print.
- Determine supports needed for teachers to increase the availability of accessible educational materials to all students in their primary learning medium.
- Improve effectiveness of paraprofessional supports to increase student access to the curriculum by evaluating their role and responsibilities to include greater individualized and specialized supports to students. Include ongoing management and training of paraprofessionals.

Access to Grade Level Content

Findings

A specific examination of the use of curriculum materials and access to grade-level content was not conducted at the School for the Blind. However, it seems apparent there is a broad range of curriculum offerings, and some students participate in off-campus courses at local schools. The educational leaders and

teachers in the leadership focus group reported there is a curriculum review process at CSDB. Teachers reported that braille-reading curricula are used for braille-literacy instruction and that additional literacy materials are used in beginning braille-literacy instruction. A science textbook is used in science instruction, and teachers said there are other curricula used in core subject areas. Integration of the expanded core curriculum (ECC) was evident in many classrooms, and explicit instruction in the ECC is conducted with students.

Despite the apparent broad range of curriculum offerings and staff reports about the curriculum review process in use, it is not apparent how access to grade-level content is implemented. There was a lack of rigor in content for at least some of the students, as they were completing tasks very quickly without any extension or tougher concept requirements. Various findings in this report provide evidence that overall rigor is lacking. For example, student outcomes, student yearly progress, parent concerns, stakeholder concerns, time in reading and math teaching and learning activities, and access to content all suggest access to grade-level content is not at an expected level. Students in the focus group were articulate and positive about their knowledge and skills, but they also alluded to a need for access to higher-level content.

Related to the issue of access to grade-level content is the foundational disposition of high expectations for students. There are a variety of ways to instill high expectations for student knowledge and skills and overall engagement that were not evident during instruction. For example, student independence in teaching and learning activities, use of tools for accessing content, and student access to learning materials in their primary learning mode would demonstrate high expectations and was lacking during instruction. When whole-group instruction is used and mixed grade-level classes are conducted, how is grade-level content applied? The rigor and overall student expectations do not seem evident. How is a systematic process used to explicitly discern and identify how grade-level content is modified for students?

Recommendations — Immediate Improvement

- Provide professional development activities, which includes off-campus site visits to typical schools to stay informed about current trends and strategies used with all students to learn grade-level content.
- Identify and implement a systematic process for determining modifications to grade-level curriculum for students who are discrepant in literacy skills from their grade level.

Recommendations — Long Term

- Examine curricula at all grade levels and areas, such as literacy, numeracy, science and social studies to ensure appropriate curricula is in place.
 - Partner with a typical school district for professional-development activities in curriculum development. Include professional development in grade-level teaching and learning strategies.
 - Include parents and other stakeholders in the curriculum review process.

Program Review
Colorado School for the Deaf and the Blind

August 2019

- Develop a systematic process for determining modifications to grade-level content in the core subject areas for students with grade level learning gaps and include a method to monitor student progress. Include professional development activities for all staff.

Residential Program

The CSDB operates a residential program for students who need to stay at the school during the week because they live outside the Colorado Springs region and/or for 18- to 21-year-old students who need to develop independent living skills. The facilities have recently been upgraded to simulate “apartment living,” with modern kitchen facilities and common areas. The program appears to be well run, with clear staff procedures and processes that are designed to provide a safe and secure place for students. Residential staff appeared to be actively engaged with the students and to work hard at developing positive relationships. The environment was one of tolerance and acceptance. Building security and student safety was a priority, and the staff strictly followed security procedures.

Data Sources

Interviews with residential program staff, survey of Directors of Special Education, and feedback from the town-hall meetings and online questionnaire.

Findings

The residential center staff communicates daily with the instructional staff in order to support student academic success (e.g., helping students track and complete assignments, providing academic support/tutoring). Residential staffers communicate with parents on a weekly basis — more frequently, if necessary — regarding student social and emotional growth/needs.

The residential program staff also supports students who have jobs outside CSDB. This ranges from helping them find transportation to the work site to reinforcing job-related behaviors such as being on time for work and dressing appropriately.

The residential center also provides students with opportunities to acquire a variety of independent-living skills that prepare them to function outside CSDB. For example, students learn how to cook meals, do laundry and manage money. Mostly importantly, students learn how to interact with others in a non-academic environment.

Recommendations — Immediate Improvement

- Develop formal relationships with community agencies that also support independent living for adults (e.g., the Independence Center in Colorado Springs) in order to coordinate services and maximize resources and support for students and families.

Program Review
Colorado School for the Deaf and the Blind

August 2019

Employability Center

CSDB houses an Employability Center for their students. Students are served in a partial classroom and partial work-assignment modality. The center also has Bridges to Life, a transition program that serves 18- to 21-year-old students. These students have earned their diploma and have deferred receipt to continue in Transition Services. Students are assessed with career inventories to determine areas of interest in career-related fields. Students are paid for their work experiences via the State of Colorado, although it is noted that employers view the students as volunteers. Job reviews are done by staff and employers to provide feedback to students and the staff that supports them. They currently are in the process of developing a work-study employer survey and have piloted it with a few select employers to gain feedback. They also work with families and the local Division of Vocational Rehabilitation (DVR) to transition students to home (or to the area that will be their home) in the last semester before they turn 21 so that they can establish roots in their community. Students are from around the state, so the final transfer to the local DVR is important. For the 18- to 21-year-old population, the center has a specific residence hall that supports independent-living skills the students will need. Students still have IEP meetings throughout this process.

Findings

From the Program Review Team's meeting with Employability Center staff, it was clear that they are passionate about their work and provide students with opportunities to gain work-related skills and dispositions through authentic and meaningful employment experiences. However, it seemed that home districts are not often involved with the 18- to 21-year-old population served through CSDB. It appeared to the Program Review Team that CSDB primarily focuses on assisting students to transition into the Colorado Springs area. There should be strong linkages with the home district, especially since the home district is ultimately the AU responsible for student outcomes. In addition, it is critical that students are prepared to move into career pathways that provide opportunities for advancement and enable them to support a family. This should be the expectation for all students.

Recommendations — Immediate Improvement

- Create strong and consistent linkages with each student's home school district to coordinate and collaboratively plan, with the student and family, for a successful transition from CSDB. Students and families would benefit if school districts were included in planning for a student's transition, starting at age 18. This would allow for timely and thoughtful conversation with the student and family regarding long-term planning for where the student would reside in the future, for employment opportunities and for supports needed, among other priorities. Another element of this could include CSDB and school district staff sharing contacts for resources in that area, including the local Colorado Centers for Independent Living, which is part of the Association of Colorado Centers for Independent Living.
- Develop a partnership with the Independence Center in order to better utilize its resources for assisting with transition activities such as employment opportunities, job coaching,

Program Review
Colorado School for the Deaf and the Blind

August 2019

independent-living skills, money management, self-advocacy, connections to community resources for adults with disabilities, resources for parents of students with disabilities, and current information related to requirements for Medicaid waivers and Supplemental Security Income/Social Security Disability Insurance benefit planning.

- Participate in the Pikes Peak Interagency Transition Team in order to support staff, students and families to connect with the resources available in the Colorado Springs area. This could also include access to job fairs; to information about support groups and recreational opportunities; and to the range of supports for individuals with disabilities in the area.

Recommendations — Long Term

- Conduct a regular post-secondary survey for CSDB graduates and their parents that informs program effectiveness and provides data for determining student success, effective practices, priorities for resource allocation and areas needing improvement. For example, this could be done two years after leaving CSDB and again three years later. School districts could participate in this survey and would benefit from receiving data regarding their students.
- Create an advisory committee of employers and representative agencies to assist in identifying trends to plan for; guidance for program planning and capacity development; and areas requiring focus.

STUDENT ACADEMIC OUTCOMES

Student academic outcomes at CSDB are presented in two sections:

- CSDB students' achievement and growth on the Colorado Measures of Academic Success (CMAS), the state assessment program.
- Achievement and growth of CSDB students on CMAS compared with other students with IEPs and other D/HH and/or B/VI students from across the state.

Data Sources

Colorado administers state assessments in English language arts (ELA) and math to all students in grades 3-8; in science to all students in grades 5, 8 and 10; and social studies to all students in grades 4 and 7. The Colorado PSAT is given to 10th-graders and the Colorado SAT is given to 11th-graders. Both high school assessments measure math and evidenced-based reading and writing. Collectively, all the assessments make up the CMAS. Student achievement at the district and school level is reported as the average scores for all students for each subject area — except social studies, for which only statewide results are available — and for each grade.

Student academic growth in ELA and math is measured using the Colorado Growth Model. This is a comparative approach in which a student's growth from year to year is compared with other students who received the same score as he/she did in the previous year. Each student is assigned a student-growth percentile (SGP) based on how much he/she grew compared with his/her "academic peers," who are students with the same scale score that he/she had the previous year. A student who has a SGP of 90 grew more than 90% of other students in that grade and subject area compared with students who scored where he/she did the previous year. A student with an SGP of 10 grew more than 10% but less than 90% of students who started where he/she did last year. A SGP of 50 is considered "typical growth."

Growth for schools and districts is expressed as the median growth percentile (MGP) for all students in ELA or math. (Growth scores are not available for science and social studies.) A school that has an MGP between 35 and 65 is described as showing "typical" growth for that subject area. In other words, students at that school in that subject area demonstrate typical growth. A school with an MGP under 35 means its students achieve less-than-typical growth in that subject area. A school with an MGP over 65 means its students achieve more-than-typical growth.

Students' Achievement and Growth on Colorado Measures of Academic Success

Findings

Table 1 displays CMAS results for CSDB students for 2016-18. The average scores for CSDB students in grades 3-8 have remained relatively stable on the ELA, math and science portions of the CMAS over the past three years. Scores for evidenced-based reading and writing and math on the PSAT declined from 2017 to 2018. Scores on the SAT are only available for 2018 because the number of CSDB students who took the SAT in 2017 was less than the number required for public reporting. Colorado stopped giving the ACT after 2016.

The average scores for CSDB students on these state assessments are below state grade-level expectations for every subject area and grade level. This indicates that most students at CSDB score well below grade level in math and ELA at every grade tested. At the high school level, the average PSAT and SAT scores do not meet the threshold for admission to credit-bearing courses in Colorado's public institutions of higher learning. That means that most students graduating from CSDB would not be able to enroll in credit-bearing courses at Colorado's public community colleges and universities.

Table 1
CSDB Average Student Scores
CMAS 2016-18

Year	ELA	Math	Science	E-B R/W CO PSAT	Math CO PSAT	E-B R/W CO SAT	Math CO SAT	CO ACT
2016	688.2	687.5	465.7					14
2017	690.1	690.7	457.3	376.8	370.8			
2018	691.1	688.1	466	360.8	352	371.9	354.2	

Growth scores for CSDB are displayed in Table 2. The MGP for CSDB students in ELA indicate that, on average, they are making less-than-typical growth in that subject area compared with other students who had the same score as they did the year before. The MPGs in ELA have increased slightly over the past three years but still remain in the less-than-typical growth category. On average, CSDB students of all abilities demonstrated less growth from 2017 to 2018 than 70% of students who scored where they did in

2017. Math MGPs for CSDB are somewhat higher than in ELA but are on the low end of typical growth. That indicates that about half of CSDB students who took the state math assessment in 2017 and 2018 showed low growth in math.

Table 2
CSDB Growth in ELA and Math
CMAS 2016-18

Year	ELA Median Growth Percentile	Math Median Growth Percentile
2016	24.5	41
2017	28	41
2018	30	38

Overall, the achievement of CSDB students in ELA, math and science is well below grade level, and many students demonstrate less-than-typical growth in ELA and math. This low level of student performance is compounded by the fact that 20% of CSDB students in tested grades and subject areas did not take the state assessment last year and were given the Colorado Alternate Assessment (CoAlt). The CoAlt is administered to students with significant cognitive disabilities who are instructed and assessed on alternate achievement standards. CoAlt results are not counted in school/district average scores. Other AUs are able to exempt only up to 1% of their students from the regular state assessment.

A student's IEP team makes the determination whether a student qualifies for the CoAlt following criteria provided by the CDE's ESSU. These guidelines are to be followed by all Colorado AUs. Sensory disability, by itself, does not qualify a child to be instructed on alternate achievement standards and to take the CoAlt. Students who are identified with a hearing loss, including deafness, would not qualify based on a language level. (For the sake of comparison, this is also true for any English language learner.) The child must have a concomitant significant cognitive disability in addition to the identified sensory disability or disabilities. The significant cognitive disability must be documented through a body of evidence, including appropriate assessment in the areas of cognitive and adaptive skills. A significant cognitive disability is defined as one within the severe/profound range of intellectual disability. This is an important distinction, since not all

learners with an intellectual disability are eligible to take the CoAlt; only those with a significant cognitive disability are eligible. That is why only up to 1% of students from other AUs are eligible to take the CoAlt.

CSDB enrollment criteria are important to note here. One of the criteria for admission is that the student must possess a minimum cognitive functioning level of 40% of chronological age with comparable adaptive behavior skills. While some exceptions to that criterion may be made due to extenuating circumstances, most of CSDB's students should be able to access the regular state assessment, since students with a significant cognitive disability would not meet the admission criteria.

Based on a recent CDE General Supervision visit, it was found that CSDB IEP teams had over-identified students to participate in the CoAlt. Approximately 50% of the students identified by IEP teams as eligible to take the CoAlt were actually not eligible to take it. This is important for two reasons: Students were being instructed on highly modified achievement standards; and they were taking the wrong state assessment. The staff was amenable to these findings and is working with CDE staff to develop/identify training for teams.

Recommendations — Immediate Improvement

- Work with ESSU staff to train IEP team members to use appropriate identification procedures for determining which students should take the CoAlt. This should be done as soon as possible so that students take the correct state assessment and, more importantly, are instructed on the appropriate state standards.
- Train all instructional staff to utilize achievement and growth scores from the state assessments to inform the instructional program and to provide students and parents with information about their student's growth toward grade-level expectations and post-secondary and workforce readiness.

Recommendations — Long Term

- Have staff calibrate/align the student portfolios with growth on the state-assessment program to enhance the utility of the portfolio data to inform instruction and provide feedback to students and parents about student progress/growth.
- Use schoolwide and classroom assessments to better understand student needs and better inform instruction on an ongoing basis. It is critical that staff understand what grade-level, evidenced-based reading and writing in English look like in practice and that there is a common understanding of that level of performance among the instructional staff. That can be done by sharing/discussing samples of student work. The resources from the CDE's Content Collaboratives work could also be useful here. Meeting state grade-level expectations should be the aspirational goal for all students.

Achievement and Growth of CSDB Students Compared with Other Students with IEPs and other D/HH and/or B/VI Students in Colorado

Findings

Figures 1 and 2 show CSDB's students' average scale scores on the ELA and math components, respectively, of the CMAS compared with the state average for all students with IEPs for the 2017-18 school year. (The students were tested in the spring of 2018.) As seen in Figures 1 and 2, CSDB's average scale scores in ELA and math are significantly below the state average for students with IEPs, and the school has some of the lowest average scores in the state compared with other AUs. This is particularly noteworthy given that 20% of CSDB students in tested grades did not take the regular state assessment.

Figure 1 — CMAS 2018

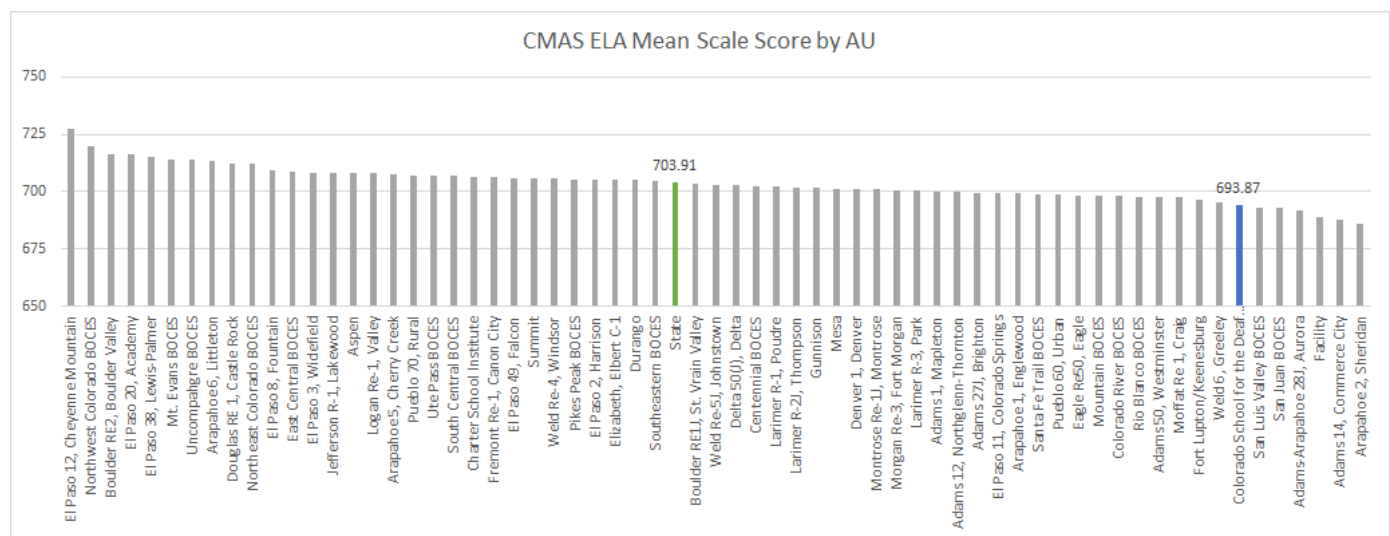
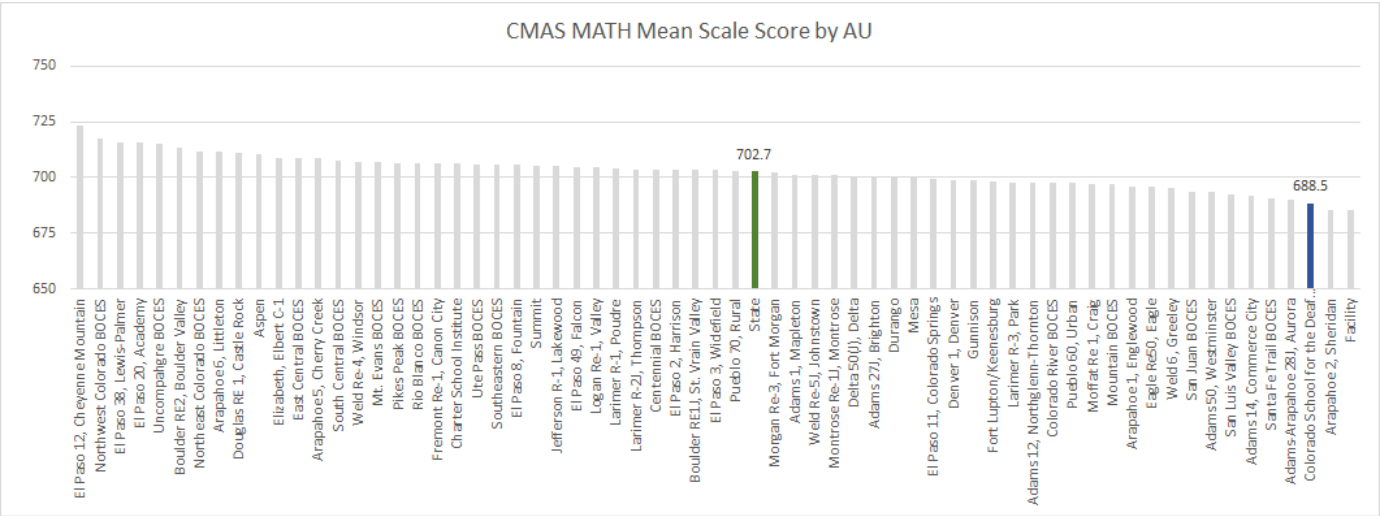


Figure 2 — CMAS 2018



Figures 3 and 4 display how the average scores of CSDB students in ELA and math compare with other D/HH and/or B/VI students across the state. At the state level, B/VI students score higher than D/HH students in both ELA and math. The scores of CSDB students follow the same pattern, but the average scale scores for both groups are significantly below the average of other D/HH and/or B/VI students from across the state.

Figure 3 — CMAS 2018

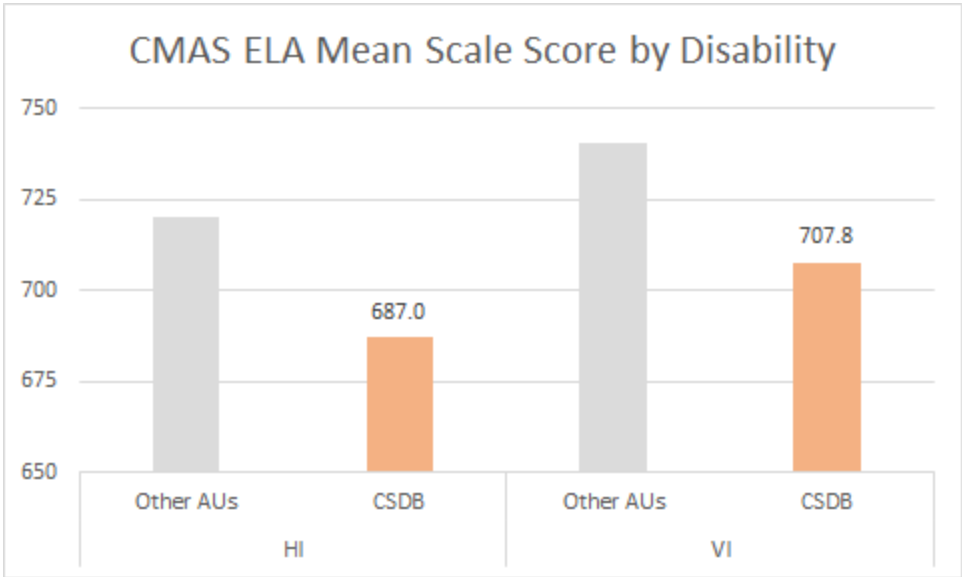
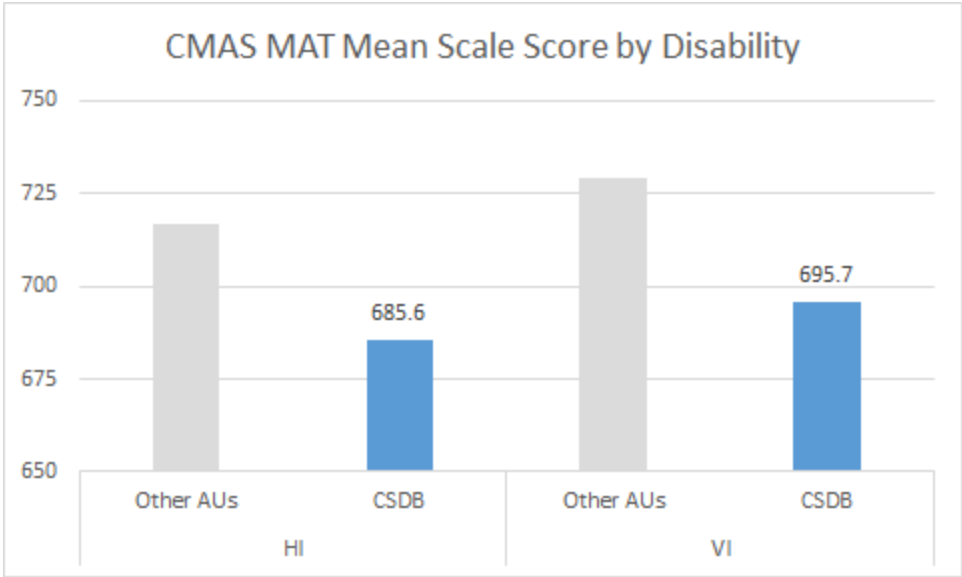


Figure 4 — CMAS 2018



Student growth at CSDB from 2017 to 2018 in ELA compared with other D/HH and/or B/VI students from across the state is shown in Figure 5. The percentage of students displaying more-than-typical growth in ELA is much lower for CSDB, and the percentage of students who made less-than-typical growth is much higher for CSDB students than other D/HH and/or B/VI students from across the state. The difference is most striking for B/VI students, where 50% of CSDB students had less-than-typical growth from 2017 to 2018, while only about 27% of other B/VI students in the state demonstrated less-than-typical growth. Almost 45% of B/VI students in other AUs demonstrated more-than-typical growth, while only 8% of B/VI students at CSDB showed more-than-typical growth.

Figure 5 - Student Growth from 2017 to 2018 in ELA

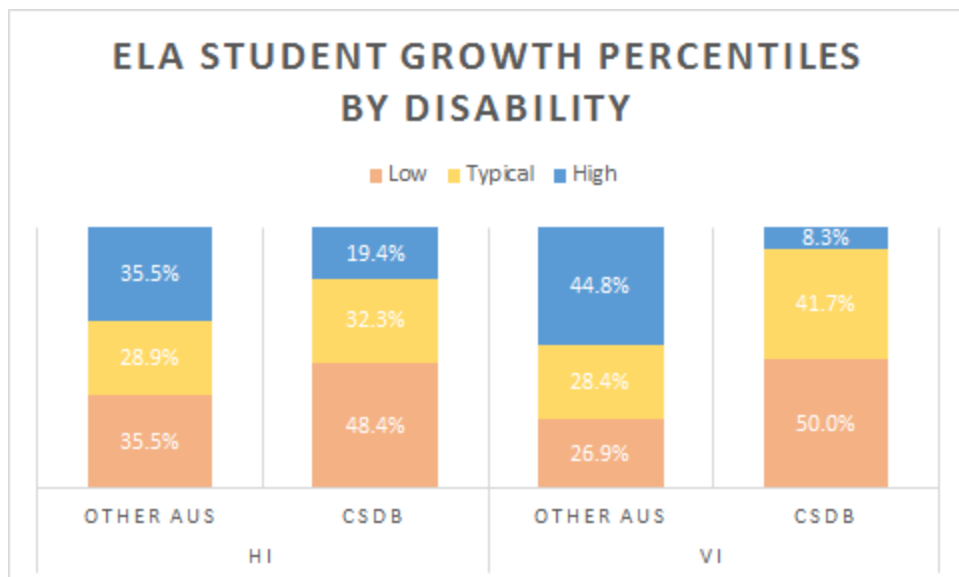
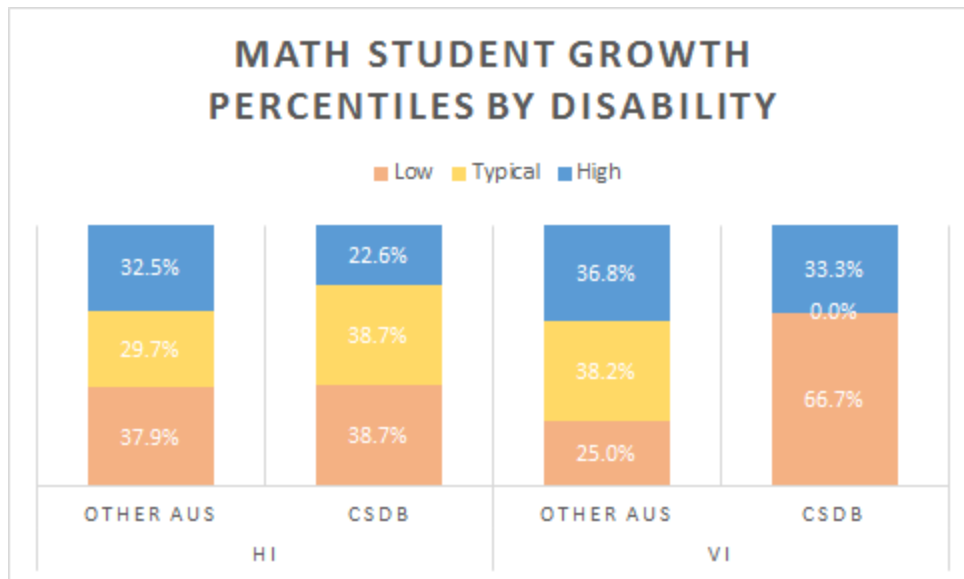


Figure 6 shows student growth in math by disability for other AUs as compared with CSDB students. A greater percentage of D/HH students at other AUs demonstrated more-than-typical growth from 2017 to 2018 than D/HH students at CSDB. About a third of the students in other AUs showed more-than-typical growth. The difference in growth in math between B/VI students at CSDB and B/VI students at other AUs was even more pronounced: About two-thirds of CSDB students had less-than-typical growth in math from 2017 to 2018, but only one-fourth of B/VI students at other AUs demonstrated less-than-typical growth in math.

Figure 6 — Student Growth from 2017 to 2018 in Math



Recommendations — Immediate Improvement

- Take immediate steps to implement the instructional improvements called for in the Executive Summary in order to increase student achievement and growth.

Recommendations — Long Term

- Set an aspirational goal that every student will demonstrate typical growth in ELA and math; student growth is a very important measure of the effectiveness of the CSDB instructional program.
- Continue to compare student achievement and growth at the school with other AUs and D/HH and/or B/VI students across the state. Also, work with ESSU staff to identify a comparison group based on IEP goals and/or other student characteristics; this will provide additional context for evaluating the school's student outcomes and identifying/understanding the root causes for poor student performance.

OUTREACH PROGRAM

Outreach services provide support to children who are D/HH and/or B/VI, to their families, and to the AU/districts and service providers who support them at the local level. The review team examined:

- Services provided through the Outreach Program;
- How Outreach services are determined, contracted and evaluated;
- How Outreach services are funded; and
- Collaboration between the Outreach Program and the CDE, other state agencies, charter schools and other public and private entities.

Because these aspects of the Outreach Program overlap and are intertwined, a comprehensive list of findings and recommendations covering all aspects of the program are presented together at the end of this chapter.

Data Sources

Data was obtained through interviews with Outreach staff, interviews with CDE ESSU special-education consultants for D/HH and B/VI, review of various documents, comments from the town-hall meetings and the online questionnaire, and results from the consortium survey of special-education directors. The team also considered variables such as current staffing, funding sources, and decisionmaking practices regarding Outreach Program focus and priorities. The review team also examined the school's relationship with other state agencies, particularly the CDE.

Services Provided Through Outreach Program

Outreach services have evolved since the program was designated as a State Resource Center in the late 1990s to meet the identified needs of students in school districts. Since that time, services such as the Colorado Instructional Materials Center (CIMC), the Colorado Home Intervention Program (CHIP) and the Regional Colorado Hearing Resource (Co-Hears) programs were relocated to the CSDB campus. The Program Review Team was not able to determine whether other factors — such as changes due to state reorganization, funding, and trends of student and staffing needs — were considered. In 1998, CSDB and the CDE collaborated to provide the traveling Low Vision Evaluation Clinics, which continues today. In 2007, the current Outreach director was hired by CSDB to formalize an Outreach Department and to develop supports for students and school districts. In 2008-09, a strategic plan was initiated, as well as a statewide survey to determine priorities for an Outreach Program. Ideas were reportedly considered to stretch limited resources to assist districts, which included initiating a fee for service model with a flat fee for assessment services. Over time, additional services were added and another strategic plan was developed for 2013-16.

Program Review
Colorado School for the Deaf and the Blind

August 2019

From interviews with Outreach staff and documents provided by the director and other staff, current services are provided in a variety of formats based on requests from families and AUs/districts. According to Outreach staff, the program provides support in seven areas, including the following five: School and Community Partnership; School-Aged Outreach for the Blind and Visually Impaired; School-Aged Outreach for the Deaf and Hard of Hearing; American Sign Language Training; and Distance Learning. These five includes direct services, in the areas of D/HH and B/VI, for individual special-education students within their district school setting, consultation and training for district special-education staff who work with specific students, as well as various professional development offerings and training for parents and others. Early Intervention for Children (newborn through age 3) and the Statewide Early Literacy Development Initiative (infants through age 8) are also part of the Outreach Program.

Staff reported examples of the following services and supports provided by different areas of the program.

School-Aged Outreach for the Blind and Visually Impaired: specialized assessments; direct-service support by teachers of the visually impaired and orientation and mobility specialists; student and program consultation; student activities funded through mini-grants (including a June 2019 “Sensory Safari” for newborns through 8-year-olds and a May 2019 “Hike for Life” for fourth- through 12th-graders); role-model videos; parent resources; professional-development workshops, videos, information and referrals; and collaboration with the CDE to provide traveling Low Vision Evaluation Clinics.

The Low Vision Evaluation Clinics, funded via a grant from the CDE and in collaboration with the department, provide regional, 90-minute, low-vision evaluations at no cost to the family or school district. According to Outreach staff, the clinics are staffed by a low-vision specialist, a low-vision therapist and a low-vision evaluation clinic coordinator. The purpose of the clinic team is to prescribe proper devices and recommend strategies to assist students with visual impairments to access printed material and their visual environment — all while supporting literacy. A formal report is created and provided to the Teacher of Students with Visual Impairments (TVI), parent/guardian and the student’s physician. According to staff, a minimum of five appointments per day is required for the clinic to be held. For the 2018-19 school year, four clinics were conducted as follows:

- Southern region — Sept. 26, 2018 (five students from four AUs); March 8, 2019 (four students from three AUs).
- Northern region — Nov. 8, 2018 (four students from four AUs).
- Metro Denver region — Feb. 21-23, 2019 (11 students from five AUs).

Four clinics are scheduled for the 2019-20 school year, one each for the Western, Southern, Northern and Metro Denver regions.

School-Aged Outreach for the Deaf and Hard of Hearing: specialized assessments, direct-service contracts for teachers of the deaf; student and program consultation; student activities funded through mini-grants (including “Wednesdays at the Park” in July and August 2018 for newborns through 5-year-olds); parent

resources; role-model videos; FM loan bank; and professional-development workshops, videos, information and referrals.

American Sign Language Services: community sign-language classes on campus and with school district partnerships, including training entire communities in ASL or other communication systems; ASL immersion projects; professional-development workshops and videos; interpreter training; and parent support.

Distance Learning: materials developed for YouTube channel use with more than 300 videos, including ASL instructional videos (e.g., providing access for military families with a parent deployed in order for the parent to be able to communicate away from home); online self-advocacy classes; professional-development webinars and videos; individualized and group student support; and video resources for families and students.

The Early Intervention Program and Early Literacy Development Initiative are discussed later.

As reported by the Outreach team, the numbers of students ages 3-21 served are as follows:

School Year	Total Served	D/HH	B/VI	D/HH: Direct/Indirect	B/VI: Direct/Indirect
2016-17	79	64	15	not available	not available
2017-18	102	61	41	58/3	24/17
2018-19	119	74	45	71/3	23/22

For the 2018-19 school year, Outreach services for the 119 students were broken out by region as follows:

Northwest:	2
North Central:	4
Metro Denver:	9
Northeast:	25
West Central:	9
Pikes Peak:	43
Southwest:	14
Southeast:	13

Total Full-Time Equivalents for Outreach Program*

Outreach Administrative Staff: (3.15)		
Director of Outreach	1.0	Supervises, manages all Outreach programs, teams
Program Assistant I	1.0	Clerical, accounting support for Outreach staff
Administrative Assistant II	.65	Clerical support for Outreach staff
Accounting Tech III	.5	Develops contractor agreements, performs accounting functions
ASL Team: (2.1)		
ASL Coordinator	.85	Leads work of team, teaches ASL to community, parents, online to high school students
Distance Learning ASL Teacher	.75	Teaches ASL to community, parents, professionals, online to high school students
ASL Instructor	.5	Teaches ASL to community, parents, professionals, CSDB staff
Outreach Teaching Staff: (6.68)		
Teacher of the Deaf	2.28	Contracted staff (FTE: .77/.76/.75)
Teacher of the Blind/VI, Orientation/Mobility	2.3	Contracted staff (FTE: .77/.77/.76)
Distance Learning Team: (2.56)		
Distance Learning Coordinator	.81	Coordinates video/YouTube production, online training/classes
Distance Learning Instructor	.75	Teaches online ASL classes, assists in education video/YouTube production
Digital Tech Specialist	1.0	Produces educational videos for YouTube
Colorado Instructional Materials Center: (4.0)		
Principal Consultant/TVI	.58	
Supervisor II	.42	Provides Outreach support to students, educational staff, families - funded through CSDB funding
Administrative Assistants I, II, III	3.0	Funded through CDE grant Funded through CDE grant
Outreach Event Planner/web support	1.0	Assists training and event planning, supports distance learning and web based media

*FTE reported by CSDB Outreach team, including long-term temporary employees, independent contractors and full-time, year-round employees. Staff names in organizational chart exceed total reported FTE, which the review team assumes reflects part-time and contracted staff totaling reported FTE.

In terms of staff qualifications, from the information available:

- The Outreach director is licensed as an administrator and school psychologist; is a retired executive director for special education in Colorado; is a former CDE special-education consultant for school psychologists; and is experienced as an administrator in supporting students in a Metro Denver school district as a special-education director for preschool- and elementary-aged students, as well as for students identified as D/HH and/or B/VI who are in preschool through high school.

Program Review
Colorado School for the Deaf and the Blind

August 2019

- Two of three itinerant teachers of the D/HH have endorsements for D/HH; the third has a temporary endorsement for D/HH and endorsements for K-12 culturally and linguistically diverse education and elementary education.
- Two of three itinerant teachers of the visually impaired have endorsements for visually impaired and orientation and mobility, with one also being endorsed for moderate and severe needs; the third has an initial teacher endorsement for the visually impaired and orientation and mobility.

As reported by the Outreach director, state licensure is required for her position. The Outreach team reported difficulty finding qualified teachers for the visually impaired, which was also a challenge for school districts across the state. It was reported that the Outreach providers participate in IEP meetings for their assigned students, either in person or via teleconferencing options.

How Services Are Determined, Contracted and Evaluated

Access to Outreach Program support is made through a district/AU request form and subsequent contract, with a letter of agreement regarding services and fees. As reported by Outreach staff, the fees are then used to contract with specialized staff. Charter schools may also contract with CSDB.

If a parent makes a request for services or supports, the Outreach staff contacts the child's home district/AU to develop next steps in responding to the parent request.

According to staff, an underlying assumption is that Outreach services are intended to be temporary, not long term. If accurate, this is concerning, given shortages of qualified staff statewide to serve students who are D/HH and/or B/VI.

It was the Program Review Team's understanding that for some students, consultation and capacity building typically happen remotely, rather than in person, due to the nature of travel across the state. As reported, direct services are provided in person, but students are typically seen in a school-based setting only one to two times per month. The Outreach staff reports that this is due to limited resources available to serve across the whole state. The consortium survey revealed a statewide priority for greater outreach support by region and more staff to timely assist districts throughout the state for consultation, evaluation and direct-service support. The Program Review Team is concerned that there may be gaps in services for individual students and lack of timely support for the staff serving them due to limited resources. The consortium survey also identified a statewide need for more training for families and staff to address the different needs of students who are D/HH and/or B/VI for academic instruction and support.

The Outreach Program reported that it annually surveys participants in its various programs to determine the value of the service, relevance of the content, preferences for online classes for students who are D/HH, format for receiving training, satisfaction with training, best method for communication, priorities for future training, and other areas. These data inform ongoing planning and program development, as well as helping to improve services. It is important to note that in the Consortium of Directors of Special Education

survey, various directors from all regions reported a lack of familiarity with Outreach services and resources.

It appears that the Outreach Program currently provides services based on specific requests from stakeholders rather than a statewide needs assessment.

How Outreach Services Are Funded

As reported by staff, the majority of the Outreach Program is provided through FTE at CSDB, paid for with state funding. CDE provides funding for the CIMC program and low-vision clinics. CSDB provides a low-vision therapist and in-kind support for the clinics through vehicles for transportation, storage, and printing, mailing and accounting services.

As stated earlier, access to Outreach Program support is made through a district/AU request form and subsequent contract, with a letter of agreement regarding services and fees. As reported by Outreach staff, the fees are then used to contract with specialized staff. If a parent makes a request for services or supports, the child's home district/AU is contacted to develop next steps in responding to the parent request.

The Outreach Program does not receive per-pupil funding for services, as students are counted by their home district/AU.

Collaboration with CDE, Other State Agencies, Charter Schools, and Other Public or Private Entities

The Program Review Team identified activities specific to hearing impairment, including deafness, that are conducted by the CDE and/or CSDB. Activities that appear to be provided by both entities include regional meetings, equipment and material loan banks, family-support activities, professional learning, staff and contract providers, recruitment and transition support. There are also activities provided solely by the CDE or CSDB. This information was obtained from an updated draft document dated May 16, 2019, and produced by the CDE. As stated earlier, traveling low-vision clinics are provided via collaboration between the CDE and CSDB. According to the CDE and Outreach staff, there is no formal process for collaborative planning between the two agencies for implementation of services and supports to the field.

Findings

- There is a range of supports available for students and families and the staff serving them.
- For some AUs, the Outreach Program is critical in providing support for students who are D/HH and/or B/VI across the state.
- The Outreach Program leadership and many service providers are housed at CSDB, making it difficult to provide services across all geographic regions. Some geographic regions appear to have greater

needs than others. In some cases, staffers spend more time traveling than they do supporting students and/or practitioners.

- It was difficult for the Program Review Team to determine whether the numbers served by region are an accurate reflection of need.
- Adequacy of support is limited by staffing and budget constraints.
- The reported original intent of Outreach services to be temporary does not address long-term needs for adequate staffing, capacity building or resolution of staffing shortages.
- The Outreach Program provides a variety of supports (e.g., direct service, online consultation and support and distance learning) for students, families and practitioners. The Program Review Team was not able to determine whether these strategies are effective and/or whether participant growth or skill development is measured.
- Outreach services — while attempting to meet specific district, student and family needs with limited staff — appear fragmented and are not based on a comprehensive assessment of needs across the state.
- It appears that the Outreach staff focuses primarily on ASL training and support. The Program Review Team was not able to determine whether the full range of communication options is available to parents and staff serving students who are D/HH.
- Based on interviews, it appears that Outreach and CDE staff effectively collaborate to provide direct services to students who are B/VI and ongoing supports to districts/AUs.
- The current practice of evaluating the quality and effectiveness of services through regular surveys of participants is one tool to help provide data to inform decisionmaking and use of resources.
- Activities for students and families seem to be primarily offered in the Colorado Springs area.
- The Consortium of Directors of Special Education survey identified the following strengths:
 - Students with significant needs receive services in their AU that would otherwise be difficult to access. This includes direct support and/or collaboration and consultation with AU staff.
 - Service providers are generally well qualified with a strong background in their area of expertise.
 - Diagnostic/evaluation services provide a critical support.
 - Valuable resources are provided for families (e.g., sign-language classes and classes specific to families and other adults regarding supports for children who are D/HH and/or B/VI).
- The consortium survey also identified a statewide priority for more timely and greater outreach to districts and regions for consultation, evaluation, direct service and training, and capacity building for families and district/AU staff. This priority was also identified in the three town-hall meetings.
- The survey also revealed that some directors in each region have a lack of familiarity with Outreach services and resources.
- Teachers of the D/HH and/or B/VI are difficult positions to fill for some AUs due to state and nationwide shortages, which increases their interest in support from CSDB's Outreach staff.
- It was difficult to determine whether the current staffing allocation and focus reflect statewide needs.

- It was difficult to determine how frequent and effective coordination and collaboration are between CSDB and CDE staff related to services and supports provided to districts, parents and others, and effectiveness of current strategies. As noted earlier, according to CDE and Outreach staff, there is no formal process for collaborative planning between the two agencies for implementation of services and supports to the field.

Recommendations

The Outreach Program at CSDB is an important support for children, families and special-education service providers throughout Colorado, and program-improvement activities are essential to sustain and increase capacity to provide and support critical services to children who are D/HH and/or B/VI. Recommendations for improvement in the Outreach Program for students, families and their school districts are presented in the following areas: collaboration; services; staff; and program monitoring and evaluation.

Collaboration

- Develop a formal process for ongoing collaborative teaming to communicate and plan between CSDB and the CDE, as directed by ESSU's Executive Director. This collaboration will focus on improving comprehensive and consistent services and supports to all students identified as D/HH and/or B/VI, their families and the staff serving them, as suggested in these recommendations.
- Include an ongoing process to review and improve effective coordination and collaboration between the two agencies.
- Communicate the plan to AU directors and superintendents across the state.

Services

- Develop, in coordination with the CDE, a collaborative comprehensive plan to address program improvement, beginning with a statewide needs assessment of AU special-education directors. The survey should also include the AU direct-service providers in D/HH and B/VI, who can be accessed by partnering with the Consortium of Directors of Special Education for timely statewide feedback. Include an analysis of the services that each agency is currently providing, as well as the unmet service needs, and identify overlaps, redundancy, and gaps in supports and services.
- Use the findings to transform services through developing a coordinated and integrated short- and long-range improvement plan to meet the identified needs and capitalize on the expertise, experience and resources available in both agencies.
- Clarify the purpose and roles of CSDB and the CDE in Outreach services and supports and share these purposes and roles with AU directors and service providers across the state.
- Reform and redesign a systematic and organized approach for Outreach services to meet the current and most-pressing needs of students and the districts/AUs serving them, as identified in the statewide needs assessment. Distinguish needs and services for students who are D/HH from those

Program Review
Colorado School for the Deaf and the Blind

August 2019

who are B/VI. Include increasing capacity through collaboration with agencies and AUs, identifying current strategies/models that are working, and developing additional collaboration models, such as a regional model. Include program components such as consultation, student evaluations, direct services and technical assistance. Consider new partners, such as higher education, to achieve licensure/certification in areas of critical shortage, as well as capacity building to meet student needs.

- Communicate an organized and accessible menu of Outreach Program supports and proactively share resource information with AU special-education directors, including annual presentations at the state directors meetings.

Staff

- Ensure that CSDB's Outreach staffers are qualified to provide a full range of communication supports for students and families, including:
 - Students who are D/HH (e.g., listening and spoken language, ASL and cued speech). This includes effective communication with families regarding the language for instruction and tools needed for the students to have full access to instruction.
 - Students who are B/VI and need braille, and for whom appropriate braille-literacy supports are critical.
- Ensure that professional development — conducted regionally and based on annual needs-assessment results — also considers licensure/certification requirements and addresses the complexities of providing educational services for students who are D/HH, including the range of communication options, access, interpreter usage, literacy and content instruction, role of the teacher of the deaf (TOD) and general-education teacher, speech and language pathologist and educational audiologist, school psychologist and others; and for students who are B/VI, including certification requirements for braille, orientation and mobility and technology.

Program Monitoring and Evaluation

- Conduct ongoing monitoring of implementation of services and seek feedback on the effectiveness of services.
- Conduct a yearly program evaluation of the various Outreach Program components. This should include but not be limited to the following: outcomes for participants in distance learning, student data that demonstrates the results of service implementation, effectiveness of resource allocation, results of regional capacity building, communication tracking systems, ongoing collaboration efforts, and mutual accountability activities with the CDE and AUs.

Program Review
Colorado School for the Deaf and the Blind

August 2019

EARLY INTERVENTION PROGRAMS

Early Intervention Programs, while serving a different age population, are considered a component of the Outreach Program. The review team focused on the:

- Statewide Early Literacy Development Initiative (ELDI); and
- Colorado Home Intervention Program (CHIP) and CO-Hears; and Early Intervention for B/VI.

Data Sources

Data was obtained from interviews with the Early Literacy Program and Outreach staff along with program materials supplied by the Early Literacy staff. The findings and recommendations were also informed by interviews with CDE ESSU special-education consultants for D/HH and B/VI, comments from the town hall meetings and the online questionnaire, and results from the Consortium of Directors of Special Education survey.

Statewide Early Literacy Development Initiative

Services are delivered through the Colorado Shared Reading Project (CSRP), adapted from research-based practices designed to teach 15 principles for reading to deaf children to family members who have D/HH children through age 8. They are also taught the ASL vocabulary used in a variety of developmentally appropriate books. Literacy and language instructors, primarily contracted by CSDB, are ASL users who go into the homes of participating families up to three times per month to teach family members. Families can also access the services via web-based instruction. Funded by state general funds, the program provides for families to participate up to five years or until their child reaches the age of 9. A video assessment of parents' ASL and book-sharing skills, as well as the growth they are making, is scored by CSDB staff, using a rubric, with goals subsequently identified for the family for the upcoming year. The data is sent to CSDB's accountability coordinator, who develops a summary report regarding the impact of the services. According to Outreach Program staff, 112 families are being served, 14 of them via webcam. Currently, there is a waitlist of 67 families.

ELDI FTE

Consultant: Language, Literacy Instructor	.75	Serves families in Pikes Peak region and coordinates/develops early-literacy activities throughout the state
Temporary Staff	unknown	Manage and provide in-home literacy support for families in Metro Denver area
Temporary Staff	unknown	Manages program database and provides web-based literacy support

Program Review
Colorado School for the Deaf and the Blind

August 2019

Findings

- As identified earlier, it appears that ASL is the primary mode of communication being taught or supported in this program.
- The Program Review Team was not able to determine current FTE, how parents are informed of the program or how they apply.
- There is a correlation between a strong foundation in English and reading skills, which would indicate a continued priority for following evidence-based practices as detailed in the Early Literacy Development Initiative.
- More resources are needed to support parent needs and to eliminate any waitlists, as well as improving communication regarding this support for parents.
- This is a program that may benefit from a regional capacity-building approach with distance-learning modules and online coaching for individual families according to their needs.
- The Program Review Team was not able to determine whether statewide needs have been identified or whether the current model is effective.
- The Program Review Team questions whether waitlists are legally defensible and whether they are permissible.

Recommendations — Immediate Improvement

- Participate with Outreach services in a statewide-needs assessment to determine interest and need for this program.
- Collaborate with the CDE and any other appropriate agencies to review identified needs and develop short- and long-term plans to reach all interested parents/caregivers.
- Increase the effectiveness of communication tools to inform parents/families of this resource.

Recommendations — Long Term

- Ensure that parents have access to the full range of communication options — not just ASL — that recognizes parent choice and needs and priorities for the child over time.
- Continue to support capacity development and elimination of waitlists, given the correlation between a strong foundation in English and reading skills such as evidence-based practices in supporting the five pillars of reading and academic success.
- Conduct ongoing surveys of participants, in addition to reviewing the growth rubric, to determine the effectiveness of the existing model and make adjustments as needed.

Colorado Home Intervention Program (CHIP) and CO-Hears; and Early Intervention for B/VI

These programs provide services and coordinate with other agencies and services that children and families access as they navigate the medical, early-intervention and educational-service systems.

Program Review
Colorado School for the Deaf and the Blind

August 2019

The Early Intervention Program includes the Colorado Home Intervention Program (CHIP). CHIP was originally funded by a federal grant in 1969 to the Department of Speech/Language Pathology and Audiology at the University of Denver. Subsequently, it was moved to CSDB for early intervention — newborn through 3 years old — through trained CHIP facilitators to provide early intervention in the child’s home. Referrals were made directly to CHIP from hospital audiologists, health-care professionals, pediatricians, families, early-childhood teams and others. The referral was received by the Regional Colorado Resource CO-Hears Coordinator, who would contact the family and begin to make the necessary connections for services and ongoing supports. This is described in *Resources for Families: Colorado Home Intervention Program*, a resource book for families and published through CSDB. The book provides basic information for parents about hearing and hearing loss, and child development, as well as specific ideas and strategies for parents, including information on communication and language, and auditory and speech development.

Current Model: According to Outreach staff interviews, the CHIP and CO-Hears programs continue to be in place as described above, with the exception of changes to the referral process. Outreach staff reported that CO-Hears and CHIP have specific staff assigned to support families of children identified as D/HH. Staffing details were included in the previous section. Currently, there are 354 children who are D/HH being served, with 255 receiving direct service, 18 who are deaf and blind, and nine on consultation support. Services are reportedly individualized based on child need, with some having a combination of direct service and consultation. Services are provided through an itinerant staff model with support from staff across the state. The Outreach Program works with regionally located staff to avoid travel issues across the state.

It appears that referrals are made to the Early Intervention Program either directly from the hospital or through a representative of Colorado Families for Hands & Voices. As reported to the Program Review Team, once the referral is received, the CO-Hears representative reaches out to the family to set up an initial meeting and offer resources. The CO-Hears representative works in collaboration with the parents to develop a plan of action for ongoing supports for the child and family, recognizing that needs will change over time. A reported critical component of CSDB’s Early Intervention support is recognition that parents need to be given time to digest new information, which often can be overwhelming, and that their awareness of their needs will evolve over time. Providing ongoing support and opportunities for informed choices is critical for parents and families.

According to Early Intervention leadership, it appears that changes at the state level have been made as recently as November 2018 regarding responsibilities for the CHIP referral process. Documents provided by Early Intervention staff indicate that the Colorado Families for Hands & Voices coordinator, after receiving a referral from a hospital audiologist, may refer the family to either CSDB or a Community Center Board, or both. While not able to determine what the current state of the referral process is, the Program Review Team wonders whether this is part of a shift of responsibilities due to current discussions between the CDHS and CDE. As a result of 2018 House Bill 1333, the two state agencies developed a set

of recommendations for Early Intervention evaluations and supports, submitted to the JBC on June 30, 2019.

As of the writing of this report, the general recommendations appear to increase oversight, monitoring and authority by the CDHS, shifting primary responsibility for Early Intervention evaluations and supports to one agency. At this time, the Program Review Team does not have knowledge of the long-term impact of these recommendations for CSDB's role in the Early Intervention program.

According to the CDE's ESSU staff, CSDB is one of three contracted resources for Early Intervention for infants who are B/VI. With a geographic "catchment" area, CSDB provides early-intervention support from Castle Rock to the south, and primarily east to the state's border. The other two agencies are Anchor Learning Center and A Shared Vision, who cover the rest of the state. The three agencies are contracted by Community Center Boards (CCBs) to conduct evaluations and provide services. Practices over time have resulted in an agreement that referrals are made to one of the three identified agencies, for an infant with a suspected vision impairment, based on the geographic location of the parent.

Findings

- The review team found the available information about these programs to be inconsistent and challenging to understand. Consistent and clear information was not easily obtainable.
- The Early Intervention Program tracks and provides resources to all families of whom they are aware, and reports that they support families in understanding options and communication choices for their children. While this was reported to the Program Review Team, the focus on ASL-skilled staff makes it difficult to verify whether parents are provided communication options other than ASL.
- As stated previously, it is critical that parents have access to the full range of communication methodologies, in addition to ASL. It should be parent choice and needs and priorities for the child over time that drive the choice of services.
- There may be an impact on the Early Intervention Program as a result of the work currently being done at the state level as a result of 2018 HB 1333.
- Early Intervention supports for infants suspected of having a visual impairment appear to be an effective resource, in coordination with other agencies in the state, including the CDE.

Recommendations — Immediate Improvement

- Ensure that CSDB's Early Intervention staff actively collaborate with other agencies who have a deep knowledge of communication methodologies beyond ASL, in order to provide parents with the full range of communication options at the time of identification of the child's hearing loss.
- Early Intervention staff must ensure that family trainings and support offerings are available outside the Pikes Peak Region.
- Revise communication about the Early Intervention Program to make it accurate, consistent and easily accessible to parents and other stakeholders.

Program Review
Colorado School for the Deaf and the Blind

August 2019

- Early Intervention staff should work closely with the CDE's ESSU staff to define and determine the Early Intervention Program (for both D/HH and B/VI) in light of the ongoing work of the CDE and CDHS to shift authority for early-intervention evaluations and supports to CDHS, through the interagency work of 2018 HB 1333.
- Communicate with AUs regarding how any new system will work. Timely and seamless referrals to AUs prior to the child's third birthday are critical, especially for advance planning for highly specialized educational, family and staff supports and training.

Recommendations — Long Term

- Early Intervention staff should ensure that parents have access to a range of communication methodologies/options from which they can choose, and that all options are fully supported, recognizing that needs and priorities may change over time.
- Identify current successful strategies related to interventions for infants with visual impairments and determine whether any are applicable or relevant to the CHIP or CO-Hears model.

RESOURCE ALLOCATION AND PER-PUPIL SPENDING

There were five areas of focus for the “resource allocation” review:

- Revenues;
- Enrollment;
- Expenditures;
- Staffing;
- Comparisons with similar schools in other states; and
- Fiscal risk assessment.

Data Sources

Most of the data for this component of the review was obtained directly from the CSDB Finance Office as extracted from the state’s financial system, as well as the report from the Fiscal Risk Assessment conducted by the CDE. (The data is from the most recent fiscal year, 2017-18.) In addition, financial data about schools in other states serving this population was provided by the schools themselves or state departments of education. Data from interviews with CSDB instructional staff and the superintendent also informed the findings and recommendations for this chapter.

Revenues

The sources of revenue for CSDB are listed by category in the table below:

Revenue by Category	
Revenue Source	Amount
State General Fund/PPR	13,156,062
Medicaid Reimbursements	363,033
Fees & Conferences	36,554
Outreach Services	510,773
Out of State Tuition	64,564
Federal Grants	552,302
Early Intervention	1,387,401
Operating Expense Reimbursement	666,689
Utilities Reimbursement	594,918
Federal IDEA Funds	138,201
State Vehicle Reimbursement	21,569
State Shift Differential Reimb.	105,582
	\$ 17,597,648

Enrollment at the school varies throughout the year but fluctuates at around 270 students. Total revenue divided by total enrollment is approximately \$90,000. This doesn't include Outreach students across the state. If you add Outreach students, the number drops to about \$26,000 per pupil. It should be noted that Outreach students are not full-time students.

The 17.29 FTE staff are paid by the State General Fund through the school. An additional 2.43 staff FTE are paid through revenue earned from billing districts. This brings the total Outreach staff FTE to approximately 20.

Some funds are designated by the state as "cash funds." Examples of cash funds include Fees & Conferences revenue, Outreach services revenue and out-of-state tuition revenue.

Medicaid funds can be spent on programs benefiting Medicaid eligible students and are a reimbursement of funds already spent on qualifying Medicaid services spent by CSDB.

Grant funds must be monitored closely and can only be spent in accordance with grant guidelines. They appear to remain relatively constant from year to year for CSDB, subject to federal grant appropriations.

Even though CSDB is funded as a state program, it is also funded like a school district, and it has similar revenue per student. CSDB completes the October pupil count the same as traditional school districts. However, CSDB must submit to the CDE, on a monthly basis, the actual number of students in daily attendance. CSDB is funded based on the daily count in an amount equal to 173% of the statewide base per-pupil funding calculated as a daily rate.¹

The daily rate per student for CSDB is calculated this way: \$6,768.77 (statewide base per pupil) times 1.73 equals \$11,709.97, and dividing that amount by 235 days equals a daily rate of \$49.83 per pupil.

Interestingly, CSDB's Per-Pupil Revenue (PPR) is roughly equal to traditional school districts in Colorado even though CSDB's cost structure is significantly different given the high percentage of special-needs students, the operation of a residential facility and the longer school calendar of 235 days. Traditional school districts are not funded on a daily rate and are fully funded in accordance with the school finance act as long as the students meet the instructional time requirements.

In Colorado, a school district with 275 students receives approximately \$11,000 per pupil, depending upon the cost of living in the region of that school district. This per-pupil revenue is similar to CSDB's annual per-pupil revenue. However, it should be noted that the CSDB instructional calendar is 235 days, while a typical school district has an instructional calendar of 180 days (excluding districts with four-day weeks). CDE applies a proration factor, currently 90%, in case there is a shortfall in funding. The amount is trued up at the end of the year with a closeout payment to ensure the entire appropriation is used.

Enrollment

Enrollment is spread across six different categories, as shown in the table below:

Enrollment Detail FY 17/18	
Traditional Students	167
Traditional Students - 18-21	28
Residence Students	76
Outreach - CHIP	332
Outreach - ELDI	147
Outreach - School Aged	102
Total	852

As you can see, a significant percentage of the student population are Outreach students who are not at the CSDB campus in Colorado Springs.

¹ See Section 22-54-129, State Board Rules (1 CCR 301-39, specifically 15.00 through 19.00), <https://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=4949>.

Expenditures

Expenditures are coded in a different manner than traditional school districts. CSDB uses account codes that fit into the state's CORE financial system. In an effort to create meaningful comparisons, we have approximated the expenditures using the same account coding that traditional school districts use. General Fund expenditures for FY 2017-18 are summarized below:

Budget by Major Program Code			
	Amount	Percent	Large District %
Instruction	3,881,417	24.5%	
Outreach Program	2,455,332	15.5%	
Subtotal Instruction	6,336,749	40.0%	55.1%
Pupil Services	3,828,973	24.1%	5.6%
Instructional Staff Svcs	203,136	1.3%	5.6%
General Administration	385,001	2.4%	1.1%
School Administration	42,723	0.3%	7.6%
Business Services	260,464	1.6%	1.3%
Facilities & Operations	2,196,589	13.8%	8.7%
Transportation	71,339	0.4%	2.8%
Central Svcs (H/R, I/T, etc)	2,087,811	13.2%	12.2%
Food Services	448,962	2.8%	0.0%
Total Expenditures	\$15,861,747	100.0%	100.0%

CSDB Instructional expenditures are a little less than traditional school districts, which average approximately 70% in this category. This is a reflection that although CSDB is a school, it is also similar to a smaller school district with similar overhead costs. However, the overhead costs of CSDB are spread across a significantly lower enrollment number than most school districts. Pupil Services are higher than traditional districts since CSDB has the unusual cost of a 24-hour residency program for approximately 70 students. School administration costs are lower than traditional school districts since CSDB does not code its principals to this category, as is the norm for traditional school districts. However, CSDB clearly has more school administration staff that could not be included in this amount. Certainly, the 5.0 school principal FTE could be categorized as school administration with further categorization detail. Facility-operation expenses appear reasonable given the age of the facilities, the addition of residency facilities and special requirements needed to serve the CSDB student population. Traditional school districts usually count their food-and-nutrition services program revenues and expenditures in a separate special revenue fund. Central Services expenditures are higher than those at a typical school district. This is

Program Review
Colorado School for the Deaf and the Blind

August 2019

probably a reflection of the fact that CSDB, though very small, has to operate like a traditional district. While the account codes of CSDB fit into the state's CORE system, it would be helpful for analysis and planning if the school coded its expenditures in the same manner as traditional school districts.

Staffing

One way to look at expenditures is by job classification, or job code. Job code, which clarifies the category or type of employee, is a required element in traditional school district account numbers. While the state's CORE system does not include job code in its account number, CSDB's job-code data can be estimated. The job-code classifications for fiscal year 2017-18 are as follows:

Staff by Job Code					
CPPS Job Description	Job Code	FTE	Total Wages	Total Benefits	Total Compensation
Administrator	100	14.0	1,387,808	422,809	1,810,617
Non-Teaching Professional	300	13.0	1,861,706	609,546	2,471,253
Teacher	200	67.0	4,789,772	1,701,348	6,491,120
Support Staff	500	93.9	3,135,614	1,229,624	4,365,237
		187.9	\$11,174,900	\$3,963,327	\$15,138,227

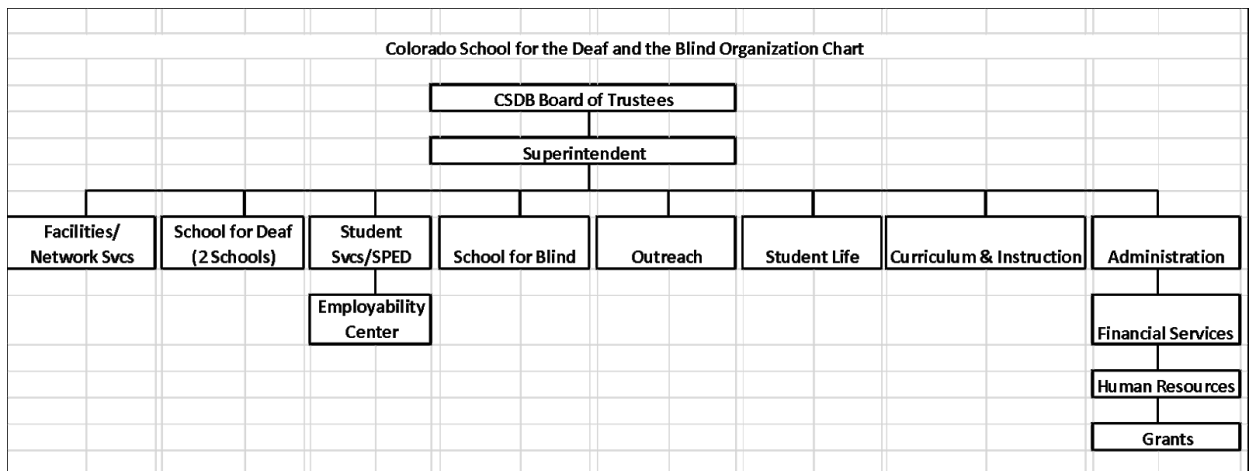
CDE defines these job codes as follows:

- Administrator — Performs managerial activities and is responsible for developing or interpreting policies or regulations and executing those policies or regulations through the direction of individuals at all levels. Administrators are exempt employees under the Fair Labor Standards Act (FLSA).
- Non-Teaching Professional — Performs assignments requiring a high degree of knowledge and skills usually acquired through at least a baccalaureate degree or its equivalent but not requiring skills in the field of education. Non-teaching professionals are exempt employees under FLSA.
- Teacher — Performs duties requiring a high degree of knowledge and skills acquired through at least a baccalaureate degree, including skills in the field of education or educational psychology. Teachers are exempt employees under FLSA.
- Support Staff — Includes paraprofessionals, office and administrative support, and the crafts, trades and services sector. Support staffers are non-exempt employees under FLSA.

CSDB has a larger percentage of support staff than most traditional school districts. Some of this is related to the residency program, and some of this can be attributed to the fact that while CSDB is a single school, it is also a small district with all of the corresponding overhead of a school district. However, it appears there are a large number of administrators for such a small school. There appear to be opportunities for reorganization in this area. Details on these administrators are displayed below:

Administrators					
CPPS Job Description	Job Code	FTE	Total Wages	Total Benefits	Total Compensation
Accountant IV	100	1.0	89,970	31,760	121,730
Human Resources Spec IV	100	1.0	89,401	31,637	121,038
Principal	100	5.0	469,370	137,129	606,499
Program Coordinator	100	1.0	113,426	28,088	141,514
Senior Consultant	100	1.0	54,366	27,107	81,473
Superintendent	100	1.0	196,573	49,732	246,305
Supervisor I	100	1.0	78,445	23,950	102,395
Unit Director	100	3.0	296,256	93,406	389,662
		14.0	\$1,387,807	\$422,809	\$1,810,616

The summary organization chart below provides an overview of the administrative structure of CSDB:



Program Review
Colorado School for the Deaf and the Blind

August 2019

The organizational structure is very flat. Flat organizations are defined by few management layers with a wider span of authority. When implemented correctly, this structure typically leads to faster decisions, satisfied customers and somewhat happier employees. When incorrectly used, however, flat organizations can cause job confusion and decreased loyalty. Flat organizations are usually more practical in smaller organizations since the few management layers make running a larger company more difficult.

On a more practical note, the flat organization structure might be challenging for the new superintendent, who has less experience with the organizational history and broad areas of responsibility. It might be worthwhile pursuing a restructuring opportunity for more efficiencies.

Comparisons with Similar Schools in Other States

Peer-group comparisons are one way to analyze financial data in order to see how CSDB compares to other similar programs in other states. The following chart shows the cost of the school when you combine all programs in the numerator and use all students, including Outreach students, in the denominator:

Peer Group Analytics					
Revenue/Pupil		Admin+Support/Pupil		Pupils/Teacher	
Florida	\$49,226	West Virginia	\$20.69	West Virginia	26.6
Arizona	\$28,017	Montana	\$14.66	Montana	16.1
Colorado	\$26,253	Colorado	\$11.46	Colorado	14.6
West Virginia	\$14,460	Arizona	\$10.46	Arizona	11.2
Montana	\$8,535	Florida	N/A	Florida	N/A

As seen in the above chart, CSDB is in the middle in terms of revenue per pupil, at \$26,253, including Outreach students. CSDB is also in the middle for Administration and Support Services, at \$11.46 per pupil. Finally, CSDB is in the middle for staffing, at 14.6 pupils served per teacher. Considering the challenges of CSDB's student population, this data demonstrates the reasonableness of the school's budget and staffing, with the exception of resources allocated to senior administrative positions.

Since Outreach students tend to skew the data, an alternate method of analysis is to compare the total cost of the school, including Outreach Program costs divided by the number of students approved for funding, excluding Outreach students.

Revenue/Trad Pupil		Pupils/Admin+Support		Pupils/Tchr	
Florida	\$91,055	West Virginia	2.0	West Virginia	2.6
Arizona	\$36,409	Montana	1.0	Montana	1.0
Colorado	\$90,740	Colorado	3.3	Colorado	4.2
West Virginia	\$146,788	Arizona	8.0	Arizona	8.6
Montana	\$142,794	Florida	N/A	Florida	N/A

From the chart above, without the Outreach students, CSDB is still in the middle of the peer group in terms of cost, at \$90,740 per traditional enrolled student, including the cost of the Outreach Program but excluding the number of Outreach students. The total cost of the Outreach Program at CSDB is \$2.45 million, which represents approximately 15% of the CSDB budget. CSDB is also in the middle for the number of pupils served per support-staff member and the number of pupils served per teacher. These cost numbers are probably more reflective of the true cost of serving D/HH and/or B/VI students.

It should be noted that enrollment fluctuates significantly. With such a small enrollment number, a change of 50 students in either direction would dramatically affect these numbers.

Fiscal Risk Assessment

In addition to the financial matters mentioned above, CDE periodically performs a Fiscal Risk Assessment that is used for a variety of state programs. The last assessment was done in the fall of 2018. The assessment contains the following eight areas:

- Turnover in program personnel;
- Turnover in fiscal personnel;
- Size of federal IDEA's Title VI, Part B grant award;
- Financial management system;
- Maintenance of Effort (MOE) test data;
- Financial Audits, single audit and corrective actions;
- Data Reporting Integrity; and
- Reverting IDEA/Carryover funds.

The results of the Fiscal Risk Assessment identify four areas of medium to high risk. Those scores are as follows:

- Date of Last Fiscal Monitoring: High risk — Last fiscal monitoring visit was two or more years ago.
- Turnover in Special Education Director position: High risk — Special Education Director hired within the past six months.

Program Review
Colorado School for the Deaf and the Blind

August 2019

- Data Reporting Integrity: High risk — Federal Application and Pipeline Expenditures do not match for grants 4027 and 4173.
- Reverting/Carryover of IDEA Funds: Medium-high risk — No IDEA funds reverted and unexplained carryover from 35% to 75%.

The results of the Fiscal Risk Assessment show that the financial operations of the school are satisfactory and the school is, from a financial perspective, run well.

Findings

- CSDB revenues are controlled by state statute and grant regulations. CSDB does an excellent job of managing and maximizing revenues.
- Expenditures for the school are within normal ranges for school districts. Some of the percentages in certain categories reflect the cost of administering a school with a small population.
- CSDB staffing appears to be reasonable, with the exception of senior administrative instructional staff.
- Senior administrative instructional staff appear to be top-heavy. Having a Superintendent, DHH Primary Principal, DHH Secondary Principal, Blind School Principal, Employability Center Principal, Director of Curriculum and Instruction, Director of Special Education, and Director of Outreach, all of whom amount to 8 FTE, seems excessive for such a small school, even one with unusual constraints.
- CSDB utilizes many “consultants” with a total compensation of \$1.2 million. CSDB utilizes consultants in a manner different from the traditional interpretation of consultants. CSDB classifies the consultants as “at-will” employment positions. At-will positions are considered non-classified employees in the state personnel system, and these positions are not protected under the state personnel rules and regulations. While this categorization may make sense from a liability perspective, these positions are categorized as employees and qualify for benefits but are not assigned an FTE. This is a little misleading for the public. Since \$1.2 million is approximately 7% of the budget, these positions are material and should potentially be considered for reclassification into the positions whose duties they truly perform.
- Peer-group comparisons from other states are difficult to find. Information was collected via a survey of comparable deaf/blind schools, and the numbers were validated from the state website for their budget. Outreach programs distort the financial numbers since there are typically more Outreach students than traditional students, even though they don’t receive per-pupil funding. In addition, it was difficult to find meaningful comparisons of schools that have both D/HH and B/VI programs. However, we were able to obtain data from four other states, and the data shows a wide variance in costs per pupil, either with or without Outreach enrollment. In either comparison, CSDB ranks in the middle. In other words, CSDB is neither the most expensive program nor the least expensive program.
- For other financial matters, it should be noted that the Fiscal Risk Assessment is performed by the CDE on a regular basis. The eight assessed areas are appropriate for a deaf/blind school. The Fiscal

Program Review
Colorado School for the Deaf and the Blind

August 2019

Risk Assessment validates that the financial operations of CSDB are well run, but the assessment should be performed more frequently.

Recommendations — Long Term

- CSDB should consider the reallocation of administrative positions in a manner that more effectively serves the instruction of CSDB students. The number of senior administrative positions appears excessive, and the resources committed to those positions might be better utilized in Early Intervention and Outreach services. The restructuring of senior administrative staff could lead to substantial savings that could be more effectively utilized for staff or programs that more directly impact student achievement. Examples of areas that could benefit from supplemental resources include:
 - Literacy coaches;
 - Math coaches;
 - Braille-transcription staff;
 - Staff with in-depth knowledge of a range of modes or methodologies of communication;
 - In-depth data analysis and instructional planning staff; and
 - Qualified teaching and paraprofessional staff.

OVERSIGHT, ACCOUNTABILITY AND TRANSPARENCY

This chapter focuses on four major topics:

- Role of the board of trustees in the oversight of CSDB;
- Effectiveness of the state accountability system in providing meaningful information for accountability and continuous improvement;
- Role of the CDE and ESSU in oversight/supervision of the performance and operations of CSDB; and
- Accessibility and utility of the CSDB website.

Data sources, findings and recommendations are presented for each topic. The accessibility and utility of the CSDB website was assessed through an independent, external review. The executive summary of the report from that process is included in this section and provides an overview of the data sources and major findings and recommendations from that review. The full report from the external review can be found in Appendix C. That report is written for a technical audience and contains more detail in regard to findings and recommendations for both content and structural improvement of the utility of the website for stakeholders.

Role of Board of Trustees in Oversight of CSDB

The CSDB is a “type 1” agency under state statute (CRS 22-80-103). A type 1 agency is under the direction of, and is supervised by, the principal state department to which it is assigned (in this case, the CDE), but it exercises its duties and functions independent of the department. The most important powers given to a type 1 agency are the promulgation of rules and standards and the rendering of administrative findings, orders and adjudications. These powers can be exercised without the approval of the executive director of the CDE (i.e., the commissioner). However, the commissioner is in control of all “budgeting, purchasing, planning and related management functions,” and any powers, duties and functions not specified by statute as belonging to the type 1 agency.

In regard to CSDB, the statute states:

“There is hereby created by a type 1 transfer in the department of education a board of trustees for the Colorado School for the Deaf and the Blind. The board of trustees shall consist of seven members who are residents of Colorado, appointed by the governor with the consent of the Senate. Of these seven members, at least one appointee shall be a blind person and at least one appointee shall be a deaf person. Beginning with the first appointment made on or after August 5, 2009, the governor shall ensure that, of the seven members of the board of trustees, at least one appointee is the parent of a child who is deaf or blind or both.”

Program Review
Colorado School for the Deaf and the Blind

August 2019

The statute also stipulates that board membership should represent a geographical balance of members from across the state, taking into account urban and rural areas.

The board of trustees can: have and use a corporate seal and be sued and sue in the schools' name; incur debts and enter into contracts in the school's name and hold buy, lease and sell property; act on behalf of the state (within their statutory powers); and determine and create the admission procedures for the school and provide for the residents of the school. The board is also required to provide record-keeping of accounts and budgeting of funds, while also setting tuition for non-resident students.

Further, the board can authorize CSDB to provide additional educational services on a local or regional basis in the state. In providing these services, the statute directs the school to utilize innovative delivery systems such as entering into intergovernmental agreements with school districts or other local governmental entities, creating partnerships with boards of cooperative services and/or authorizing charter schools.

Additionally, the board is responsible for the hiring, salary compensation and supervision of the superintendent and for providing reports to the Colorado Board of Education regarding the school's performance, training, parent education and involvement each year.

Board members are appointed for two four-year terms. The governor can remove board members for misconduct, incompetence or neglect of duty. That has never occurred in the history of the school as a type 1 agency.

Data Sources

The data for this section come from interviews with the board of trustees conducted by the Program Review Team, as well as interviews with CSDB and CDE leadership. The findings and recommendations were also informed by results from the survey of AU directors; comments from the town-hall meetings and online survey; and interviews and focus groups with members of various stakeholder groups.

Findings

From the interviews with the board of trustees, it is clear that the members are all highly committed to CSDB's mission, care deeply about the students and their families, and take great pride in the work of the school. In our interviews, board members universally indicated that the most important responsibilities of the board were to hire and supervise the superintendent, approve and monitor the budget, and monitor the school's progress in meeting its goals.

Board members were "unanimous" in the belief that they had given over much of their supervisory role to the superintendent. All members of the board stated that their supervision of the recently retired superintendent had been minimal because of her long and successful tenure at the school. Members

deferred to her to set the meeting agendas and decide on data sources to measure the school's progress toward its goals. Further, the trustees, as a group, did not have a clear idea of how the superintendent was evaluated. All trustees expressed the need to more closely supervise the new superintendent since they do not have a history with her and she is new to the school and state. (The previous superintendent served as principal of the School for the Deaf before becoming the superintendent.)

Some board members expressed a need for more support and training regarding their roles and responsibilities in supervising the superintendent and the school's operation and programs. They wanted a greater understanding of their duties as prescribed in the statute and how those should be carried out in practice. They had received some training at annual board retreats, but they didn't view it as particularly effective in preparing them for their leadership role.

Board members also expressed a desire for the school's operation to be more data-driven and to have "hard" data shared with them as part of the evaluation of the superintendent and the progress of the school and particular programs in meeting their goals. Most data shared with the board consisted of tours/visits to programs and classrooms during breaks at board meetings, followed by testimonials from students and staff in the public meeting. Trustees said they want more than anecdotal data. They want to know specifically how progress will be measured, and some members expressed a need for a baseline so that they can make sense of the information they are given. Further, board members wanted the administration to identify appropriate "comparison groups" as a way of putting CSDB data in context.

A similar situation exists in regard to the budget and financial operations. Some board members indicated they did not receive midyear (or other regular) updates on the budget and expenditures and wanted more information so they could understand and meaningfully monitor the budget.

There seems to be a lack of transparency/clarity about the board selection process and the criteria for vetting potential board members. Since the board members are nominated by the governor and approved by the Senate, there is no accountability to the public, unlike school district board members, who are ultimately accountable to the voters in their districts. Beyond the statutory requirements that one member of the board be deaf and one be blind, the criteria and process for selection are not clear. Other board members have interesting backgrounds but not necessarily experience and/or expertise in the education of D/HH and/or B/VI children. In addition, there is not a geographical balance on the board. Most of the members are from the Colorado Springs area, and only one is from outside the Front Range, which seems to be in violation of the spirit of the statute that "created" the CSDB as a type 1 agency.

Recommendations — Immediate Improvement

- Board members should receive hands-on, concrete training about their statutory responsibilities and how those play out in practice. The Colorado Association of School Boards (CASB) or other consultants (including their attorney) could provide that training with input from the board chair and the superintendent. As part of this process, board members may want to observe other school

district board meetings and talk with members of other boards about their relationship with their superintendent and how their board functions.

- The board and superintendent should mutually develop a formal evaluation process for the superintendent with the help of a consultant with expertise in this area. Organizations such as CASB and Colorado Association of School Executives (CASE) could be useful resources. The new superintendent's goals and the measures and process for judging her performance should be made public, including posted on the CSDB website. Consideration should be given to including feedback from staff, parents and AU directors as part of the evaluation process.
- The board, in collaboration with the superintendent, should identify and adopt an evaluation process for the board that provides data for continuous improvement, as well as a summative evaluation. BoardSource (boardsource.org) is a very useful resource.
- The board and the superintendent should mutually develop an annual meeting calendar with specific agenda items assigned to each month as appropriate (e.g., midyear budget review in January; results of state testing in August; and report on the state accountability system rating in December). The board chair and the superintendent should meet between board meetings to identify other agenda items for each meeting and to schedule work sessions as needed.
- The superintendent should identify specific academic performance, programmatic and operational goals for the school and work with the staff to identify appropriate measures and baseline data in order to measure progress. The board should receive regular reports on progress toward goals as part of its annual calendar based on systematic data, rather than anecdotal information.

Recommendations — Long Term

- The process by which prospective board members apply and are selected for approval by the governor and Senate should be made more transparent (e.g., posted on the website and available in hard copy) for both the public and potential applicants. The governor's office should make achieving a geographic balance on the board and adding additional representation from the deaf and blind community critical criteria in future appointments. The CDE could serve a recruiting and vetting function (perhaps with the input of an advisory group made up of members from the deaf and blind community) that would make recommendations to the governor. The superintendent should not be involved — formally or informally — in the selection of board members.
- The board should consider adopting a policy governance model where it identifies specific outcomes for relevant parts of CSDB outcomes and operations. The policy governance model would be a good fit with the type 1 organization structure since board members could identify specific data points from CSDB operations to be reported to the board on a periodic basis with varying degrees of detail. Examples of these reports could include, but are not limited to:
 - Student-achievement outcomes (especially academic growth);

- Safety and security data;
- Employee staffing data, including longevity, turnover, authorized staffing levels, staff qualifications and compensation; and
- Financial and budgetary performance, compliance and projections.

Effectiveness of State Accountability System in Providing Meaningful Information for Accountability and Continuous Improvement

Data Sources

Data for this section comes from the School Performance Frameworks (SPFs) for Alternative Education Campuses (AECs) produced by CDE; observation of board of trustees' meetings; and interviews with board members, CSDB instructional staff and CDE leadership.

Findings

The AEC state accountability process is not an appropriate or useful tool for holding CSDB accountable for student outcomes and providing data for continuous improvement purposes.

CSDB is considered an AEC under the state accountability system. The school does qualify as an AEC under one of the statutory criteria — namely, at least 80% of students have an IEP — but CSDB's student body is much different than most other AECs. These schools typically serve students who have not been in school for a significant time and/or are missing a number of credits toward graduation. Those difficulties are often associated with life issues such as substance abuse, teen parenthood and homelessness. While CSDB students do face significant challenges to learning, they do not typically have to deal with the issues that other AEC students do and they spend most of their time in a highly supportive, academically oriented environment. As a result, other AEC schools are not a good “comparison group” for the CSDB.

Also, the bar for satisfactory performance for AECs is very low. Low academic performance is easily masked in the overall rating because of the weight given to non-academic factors such as attendance and graduation and dropout rates in calculating a school's rating. That makes it possible for schools with very low student performance (for both achievement and growth) to receive an accountability rating that removes them from state intervention.

That is exactly what has happened at CSDB. The school had a “performance” rating in 2016 and 2017, and even though the school dropped to the “improvement” category in 2018, that rating kept them off the state “accountability clock.” However, in each of those years, CSDB students' scores for all academic

Program Review
Colorado School for the Deaf and the Blind

August 2019

achievement and growth measures were well below state expectations for traditional schools and for students in AECs.

In addition, the utility of the information from the SPF is limited for all districts/schools because the results are not available until four to six months after the test is given in the spring. This lack of utility for CSDB is compounded by the fact that about 20% of CSDB students who are in the tested grades do not participate in the regular state assessment program. Further, it appears that whatever information is available from the SPF is not used for improvement. The Director of Curriculum and Instruction seems very well versed in the framework, but it is not clear that all administrators and instructional staff are knowledgeable about the state framework and how the data from the state report could be used.

Recommendations — Immediate Improvement

- Provide training for the board on the measures and data from CMAS and THE SPF so they are prepared to pose appropriate questions for the superintendent and her staff.
- Presentation of state assessment results and the accountability rating should be a standing board-agenda item for the month when that information becomes available (typically in November). It may be useful for the board to schedule a work session to provide time to ask questions and deepen its understanding of the accountability framework.
- Instructional staff should review the growth scores and achievement levels for each student and use that data to inform instruction across the school and for individual students.

Recommendations — Long Term

- Student growth should be reflected in the strategic plan. For example, an aspirational goal could be that all students will show “typical” growth on state assessments.
- Colorado’s 2019 Senate Bill 204, recently passed by the General Assembly, creates a grant program to fund and provide incentives to support local innovation in accountability. The CSDB should consider applying to be part of this program. If accepted, the school would receive funds to hire a technical expert/organization to help it design a system that is a good match for its needs and provides actionable data for improvement. CSDB could also design reporting and improvement-plan formats that are tailored to the school’s and its stakeholders’ needs that could be used in lieu of the state’s formats. Even if CSDB does not participate in the grant program, it should explore partnering with a service provider (e.g., higher education or a qualified nonprofit) to design an accountability format that is meaningful for staff and stakeholders and provides useful and timely data for continuous improvement. Stakeholders should have a meaningful role in that process.

Role of CDE and ESSU in Oversight/Supervision of Performance and Operations of CSDB

Data Sources

The findings and recommendations for this section are based on interviews with CDE leadership and discussions with the board of trustees' attorney from the state Attorney General's office. Data from the Consortium of Directors of Special Education survey, comments from the town-hall meetings and the online questionnaire, and interviews with stakeholders also informed the findings and recommendations.

Findings

CDE leadership believes — based on the AG's office review of statute — that the department has no direct supervisory authority over CSDB because of its type 1 agency status. The commissioner and her staff are not reluctant to take action against a school district when their line of authority is clearly spelled out in statute, but they strongly feel that their interactions with all school districts — and they view CSDB as a school district of sorts — need to be consistent, fair and within their statutory authority. CDE leadership believes that treating CSDB differently than other school districts (e.g., intervening in the operation and leadership of the school) would be beyond what the department is authorized to do under the law. The department acknowledges that it does have some supervisory authority under IDEA, but this is mainly related to compliance with rules/regulations for how federal dollars are spent and the development and implementation of IEPs, not the operation and student outcomes of the school. Department leadership believes that, overall, each district/AU is responsible for the education of its D/HH and/or B/VI students and that CSDB is responsible for the on-campus/residential program, as well as the Outreach Program to districts.

However, the CDE does acknowledge concerns about supervision and accountability at CSDB. The department has indicated that being provided a clear line of supervision/accountability at the school could be helpful. This would probably require legislative changes to broaden the CDE's responsibilities and authority regarding oversight of CSDB.

Recommendations — Immediate Improvement

- Department leadership should explore opportunities currently available for indirect oversight of CSDB. For example, the state board/department could request that CSDB report on the operations and student outcomes of the school to the state board on an annual basis using a format and outline developed by the department. The department could use its ex-officio position on the board of trustees to provide more direct feedback on the work of the board and school. The commissioner

could also request the opportunity to review the school's performance with the board of trustees and the superintendent.

- Staff from the department and the governor's office should jointly review the application and approval process for appointment to the board and modify it to broaden the geographic representation of the board and add more blind and deaf individuals to the board. The application and vetting process should be publicly available and incorporate public review and comment with a meaningful role for parents in the process.

Recommendations — Long Term

- Department leadership, in conjunction with their attorney and representatives from the governor's office, should explore legislative changes that would provide more-direct supervision and oversight of the operation of CSDB by the department and/or work with the board to set up such a process in board policy (e.g., a periodic review of the operations and outcomes of the school by a CDE-appointed group and/or a national accreditation organization).

Accessibility and Utility of CSDB Website

As the Program Review Team carried out its data-collection activities, CSDB staff and a variety of stakeholders commented that the CSDB website is frustrating to navigate and does not provide easy access to basic information about the school. For example, many found it difficult to locate staff contact information and specific program descriptions, as well as enrollment/demographic data and details about the operation of the school. This not only impacts the ability of key users (such as parents) to obtain information, but it also contributes to an overall sense of “mistrust” and lack of transparency and openness about the outcomes and operation of the school (even if that was not intended).

In order to address these issues and provide recommendations for improvement, the Program Review Team contracted for an evaluation of the CSDB website by an independent expert with a focus on transparency and accessibility by end-users. What follows is the executive summary of her review. The complete report is included in Appendix C. The executive summary, written for a non-technical reader, provides a general overview of the evaluation and recommendations for improvement. One section of the executive summary that may be of great interest to the lay reader is the comparisons of the CSDB website to the Rocky Mountain Deaf School and the Colorado Center for the Blind websites. The complete report provides additional technical findings and more recommendations that are aimed at a technical audience of website supervisors and designers.

**Review of the Website for the
Colorado School for the Deaf and Blind
(CSDB) <https://www.csdb.org>
by Doris Boardman**

SUMMARY

July 2019

Table of Contents

Summary and Recommendations	81
Opportunities	88
Analysis of Other Websites	89

Program Review
Colorado School for the Deaf and the Blind

August 2019

Summary and Recommendations for CSDB.org

Summary

1. Almost everything the reviewer clicked on seemed to work seamlessly.
2. Follows most of the Best Practices outlined in the main report.
3. Most of the pages are accessible using secure HTTPS. The few exceptions are noted in recommendations.
4. Google Analytics tracking is enabled.
5. It appears that an SEO tool <http://www.seodesignsolutions.com/wordpress-seo/> is being utilized.
6. The recommendations below are all to increase accessibility and clarity.

Accessibility and clarity issues to be addressed now

1. Some images do have alt text/title text content (this text is used by screen readers, search engines or when the image cannot be loaded. The title is used as a tool tip when the user hovers the mouse over the image). Add those to the rest of the images on the website and use them going forward on all images.



2. Make sure you are using unique meta tags/page titles on all pages. For example, when the reviewer did a Google search for 'school for blind,' this is what showed up:

Colorado School For The Deaf and The Blind: Home

<https://www.csdb.org/>

Five boys, in the School for the Blind, pose with brailier The Colorado School for the Deaf and the Blind (CSDB) is a state-funded school within the Colorado ...

[Careers](#) · [School for the Blind](#) · [Staff](#) · [School for the Deaf](#)

The home page does not have a meta tag/page title since it is just automatically pulling in content from the top of the page. Meta tags are snippets of text that describe a page's content; the meta tags don't appear on the page itself, but only in the page's code. They are little content descriptors that help tell search engines know what a web page is about.

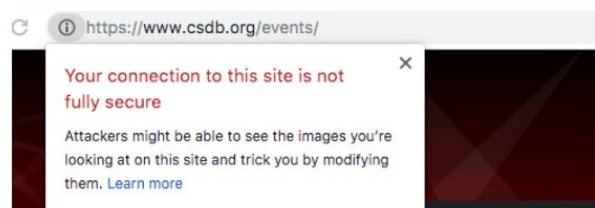
Program Review
Colorado School for the Deaf and the Blind

August 2019

3. When clicking on 'Staff' in the footer and get to linked page, 'Access to [Staff email](#)' link does not work.
4. Reviewer could not easily find a list of all staff and a way to contact them directly. The generic form that one fills out to reach a staff member is not a transparent or personal way to reach staff from a school website. Consider linking directly to their emails instead. Here are examples:
<https://rmds.jeffcopublicschools.org/cms/One.aspx?portalId=1820905&pageId=1996295>
<https://east.dpsk12.org/staff/directory/>
5. Reviewer could not find a list of staff for the School for the Blind with contact info on <https://www.csdb.org/programs-services/school-blind-2/>. This information needs to be added, similar to what is done for the School for the Deaf.
6. Pause button for the image carousel at the top of the home page sometimes does not work, and it is too close to the 'next' arrow to the right of it.



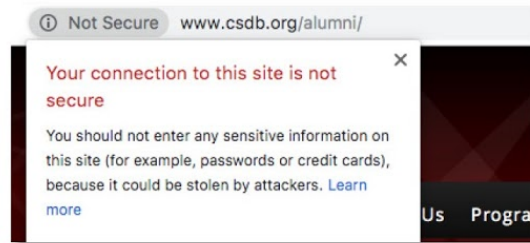
7. Remove 'Login' from the footer. There should be another secure way that is not visible to the public for the CSDB staff web content admin to get to the WordPress admin login page.
8. Right side links
 - a. The Location page is not secure: <http://www.csdb.org/campus-location/>
 - b. On the Location page, link to a Google map with 'Get directions' as the text) The URL is
<https://www.google.com/maps/place/33+N+Institute+St,+Colorado+Springs,+CO+80903/@38.8344186,-104.8094218,17z/data=!3m1!4m5!3m4!1s0x87134504f1a232af:0x3e4d2dcbf2e2e7c7!8m2!3d38.8344186!4d-104.8072278>
 Better yet, embed a Google map so that they can get directions from their location to your location.
 - c. The calendar page is HTTPS, however it appears it is not secure: <https://www.csdb.org/events/>. There is no lock tool shown to the left of the URL.



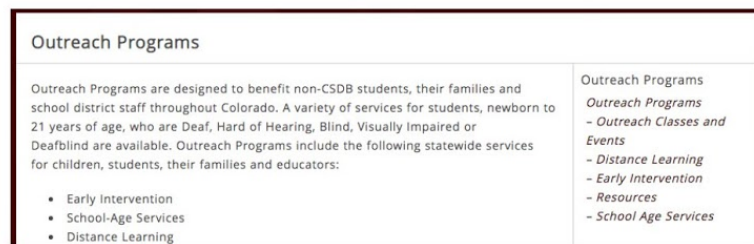
Program Review
 Colorado School for the Deaf and the Blind

August 2019

- d. The Alumni page is not secure: <http://www.csdb.org/alumni/>



9. On the right side of the Outreach Programs page, 'Outreach Programs' is listed twice in the text above the links to the programs page. It should just be there once.



10. On the schools menu page, put contact info after this sentence at the top of the page:
'Your feedback is important and helps to meet the nutritional needs and requirements of the students we serve.'
11. Not everyone has Word or Excel, or has the versions that you have linked from your website. They all have Acrobat Reader or easy access to download that program. For accessibility and to track open rates in Google Analytics, make all Word and Excel documents PDFs and make sure they are accessible using the [Acrobat accessibility checker feature](#).

Here are the pages that have Word and Excel docs:

- <https://www.csdb.org/parent-information-page/> (including Agendas and Minutes)
- <https://www.csdb.org/annual-report/>
- <https://www.csdb.org/2018-2019-board-agendas/>
- <https://www.csdb.org/2018-2019-board-minutes/>
- <https://www.csdb.org/2018-2019-superintendents-report/>
- <https://www.csdb.org/school-information/csdb-policies/>
- <https://www.csdb.org/strategic-plan-2016-2019-docx/>
- <https://www.csdb.org/school-information/csdb-school-year-calendar/>
- <https://www.csdb.org/all-school-menus/>

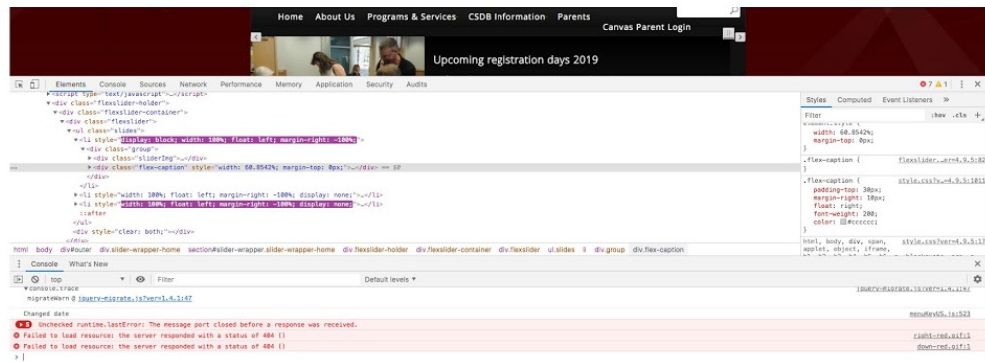
Since there are so many documents that need to be saved as PDFs,

Program Review
Colorado School for the Deaf and the Blind

August 2019

the recommendation is saving the most requested docs first, and perhaps combining some of the related subjects and/or delete some of the older ones. This is a good time to evaluate what PDFs should be on the website and what information needs to be available by other means.

12. Move more heavily visited 'CBSD School Year Calendar; and 'Menus' to the top of the 2nd level nav under 'CSDB Information,' above 'Board of Trustees.' Move 'Vision/Mission/Core Values' above 'Board of Trustees,' since the mission drives the Board of Trustees and the rest of the 2nd level nav in that section.
13. Reviewer could not easily find all of the financial information about the school. Use the words 'Financial Transparency' or 'Finances' in the navigation under 'CSDB Information' and create a new page that would include all of the financial info that is on the website on one page, including a link to the Annual Report, which should be a PDF.
14. On the home page when hovering over the rotating slideshow at the top of the page and then clicking on 'Inspect,' there are a few error messages that say 'Failed to load resource: the server responded with a status of 404 ()'. This may not be of concern, however best to have your developer look into this, and also see if there are similar errors on other pages on the website.



Navigation (nav) short-term recommendations

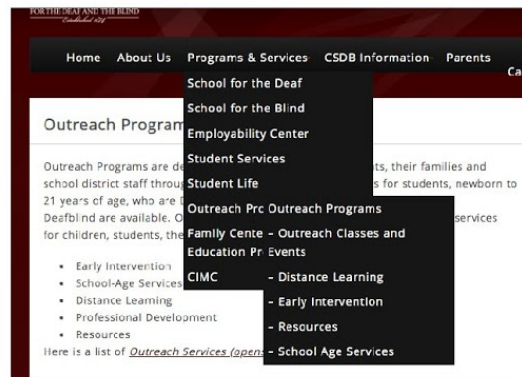
The goal is to make content appear and operate in predictable ways.

1. Footer:
 - a. Use the footer for important info that should be easy to find quickly, like your address and phone numbers, so that info appears on every page.
 - b. Leave 'Website Disclaimer' in the footer.
 - c. Put 'Athletics' as a 2nd level nav under 'Programs & Services' and remove from the footer.
 - d. Put 'Careers' as a 2nd level nav under 'CSDB Information' and remove from the footer.

Program Review
Colorado School for the Deaf and the Blind

August 2019

- e. Move 'Staff' from the footer to a second level nav under 'CSDB Information.' Change wording to 'Staff Links.'
 - f. Add something like 'Accessibility Issues?' to the footer and link to https://www.csdb.org/contact/?employeeid=webinfo&employee_name=Contact%20Us&subject=Accessibility. If someone is having accessibility issues, it would not be easy to navigate to <https://www.csdb.org/layout-examples/fullwidth-pages/page-home/about-us/> to find that contact form link.
 - g. Why is TOPS linked from the footer? That page does not appear to be of value to CSDB stakeholders since it is so generic. If it is of value, perhaps link from another page with an explanation of what it is.
2. Change 'About Us' to 'Contact Us' and put all of the pertinent info on that page, even though a lot of it will now be in the footer. Here are some good examples:
- a. <https://jeffcormds.ss12.sharpschool.com/cms/One.aspx?portalId=1820905&pageId=1996155>
 - b. <http://east.dpsk12.org/contact-us/>
 - c. Link to teacher's pages for both schools on the 'Contact Us' page.
 - d. Make sure the page name is <https://www.csdb.org/contact-us/>
3. Add Contact Information on the left side for all of the staff for School for the Blind like you do for School for the Deaf and remove it from the right side on <https://www.csdb.org/programs-services/school-blind-2/>
4. Add a favicon. A favicon is a small 16×16 pixel icon that appears at the top of a web browser. It serves as branding for your website and a convenient way for visitors to locate your page when they have multiple tabs open.
5. It is confusing to have 3rd level nav under 'Programs & Services,' 'Outreach Programs' since that is the only place where 3rd level nav is used on the website.



- Suggest removing that 3rd level nav since you have those items linked on the right side on the main 'Outreach Programs' page. Link 'Outreach Programs' in the 2nd level nav directly to <https://www.csdb.org/programs-services/outreach-programs-3/>
6. On <https://www.csdb.org/programs-services/school-deaf/>, check to be sure any visually impaired visitors are able to use the drop down plus sign for

Program Review
Colorado School for the Deaf and the Blind

August 2019

“Contact Information” to get a list of staff. Suggest removing the drop down and have this information on the web page without a drop-down + choice.

Long-term recommendations

1. Usability testing: Have individuals from students, teachers, parents, community members, deaf/blind or hard-of-hearing/visually impaired communities help test your website. Have a few people from each group tasked with finding certain things on your website. This will help you quickly see what needs to be addressed. Do this on a semi-regular basis. For example, have them search for Staff, Calendar and some of the other most requested pages. Have an impartial third party oversee the usability testing, take notes on what testers find, and implement changes as needed.
2. Put School Year Calendar in a program other than a PDF. Since it is such an important part of your website, have calendar on website in a calendar program, not as a linked PDF. Here are some examples:
<http://east.dpsk12.org/calendar/>
<https://rmds.jeffcopublicschools.org/cms/one.aspx?portalId=1820905&pageId=1820925>
3. Make images larger when possible.
4. Include images of teachers, like images that are included for the Board of Trustees. Photos of teachers lends an amount of transparency and makes website visitors more comfortable.
5. Make content and design of these pages consistent:
<https://www.csdb.org/programs-services/school-deaf/>
<https://www.csdb.org/programs-services/school-blind-2/>
6. Size images to exact final size in pixels and save for the Web before uploading to website.



For example, this home page image size featured in May 2019 was actually 3264x2448 pixels (45" wide x 34" tall) and was sized down manually when added to the website to 465x349 pixels. When an image is manually sized down it does not change the size of the file. The image file size is 1,493KB (1.5MB), which is much too large for a website. Images with a large file size take longer to download to a visitor's browser and slow down your website.

Program Review
Colorado School for the Deaf and the Blind

August 2019

7. Add an up arrow on the right side in the footer or the bottom right of the page for the longer pages. Click on it to take you back to the top of the page.
8. Redesign of website, possibly using one of the WordPress accessibility themes templates. Here are some suggestions:
<https://www.hongkiat.com/blog/accessibility-ready-wordpress-themes/>
9. How does a visually impaired user that is tabbing through the website get to the pages in the second level navigation (like Programs and Services, School for the Blind)? In a redesign, in addition to keeping in the nav, suggest also including 2nd level nav as text on the left or right side of all internal pages, like the [Rocky Mountain Deaf School website](#) does.
10. Have your developer use a heatmap tool to see where people are clicking, scrolling and reading on your site. This information can help you restructure the design while making sure important elements are always in the field of view.
11. Research paid website evaluation tools. Most companies offer discounts to non-profits. They are much easier to use than the free evaluation tools.

Program Review
Colorado School for the Deaf and the Blind

August 2019

Ongoing opportunities

1. Continue to add new content to the home page. It is important for SEO to have content updated on a regular basis—all elements of a home page should not be static. It should be a living, breathing snapshot of what is currently going on at the school.
2. Use a paid evaluation tool online service to regularly check for site-wide accessibility issues that you or your developer can fix. This service should also check for SEO, quality assurance, broken links, misspellings and usability.
3. Update stale and low trafficked content. Use Google Analytics to regularly check traffic for pages.
4. Hijack trending topics related to your content – promote on social media.

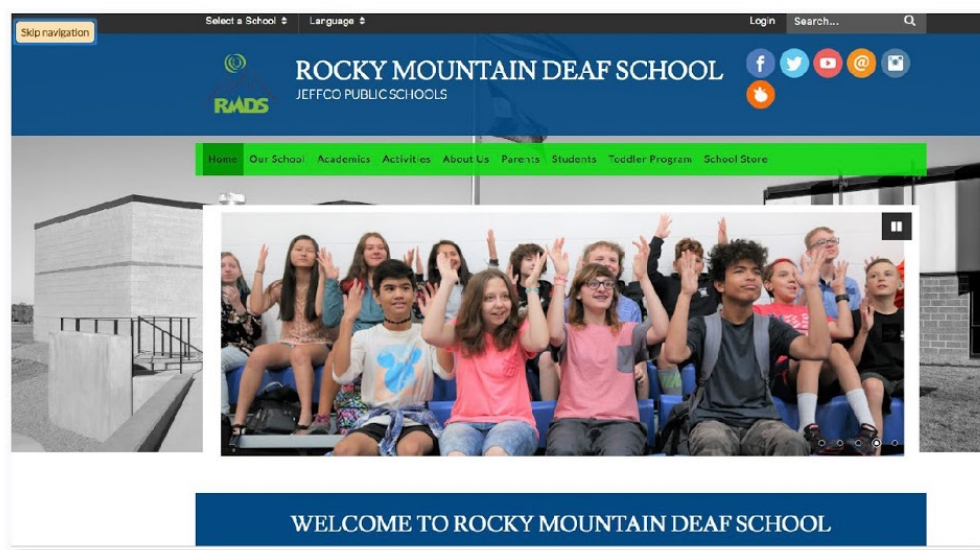
Analysis of Other Websites

This analysis is to compare the csdb.org website with similar websites and highlight things that work well on those websites. This may assist CSDB in realigning some assets on their current website with best practices. It also supports the comparison to make content appear and operate in predictable ways.

A formal accessibility analysis of these websites was not completed. There was not a review of these websites as a deaf/blind or hard-of-hearing/visually impaired person.

Website 1 of 2: Rocky Mountain Deaf School

<https://rmds.jeffcopublicschools.org/>



- Nice large images in the rotation on their home page.
- 'Skip Navigation' option is very easy to see when one hits 'Tab.'
- All second level pages are available from top level navigation. None of them are linked in the footer.

Program Review
Colorado School for the Deaf and the Blind

August 2019

What's Happening



Join the RMDS Team

Looking for fun, energetic, individuals! We are looking for an ECE Teacher and a para professional to join the RMDS team.

[Read More](#)



RMDS Summer Camp

June 3-14 from 8:30 a-4:30 p. See flyers and get registration form here.

[Read More](#)



2018-2019 Toddler Program

Join us for our Toddler Programs.

[Read More](#)

Upcoming Events

MAY 21 Elementary: Soccer Practice 3:30PM - 4:45PM

MAY 22 4th Q: Elementary Wed Club: Feel the Beat 3:30PM - 4:45PM

MAY 23 End of 4th Quarter All Day

Elementary: Soccer Practice 3:30PM - 4:45PM

RMDS Fashion Show 7:00PM - 8:00PM

[More Events](#)

← MAY 2019 →

S	M	T	W	T	F	S
28	29	30	1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	1

[Go to Full Calendar →](#)

Superintendent's Message

Welcome Rocky Mountain Deaf School website! This is a place where we share our school's programs and services. I am delighted to invite you to explore our website.

What sets RMDS apart from other schools and programs is our dedication to our students. Our staff members who all are highly qualified work tirelessly to provide academic, career and extracurricular opportunities for our students. It is RMDS's goal to provide our students the foundation by which students can continue to gain greater knowledge and skills to become a great citizen after they leave RMDS. In this place, students feel inspired to think, to learn, to achieve and to care.

I hope you learn more about RMDS and visit our site often for updates. Come for a visit and tour our new school building.

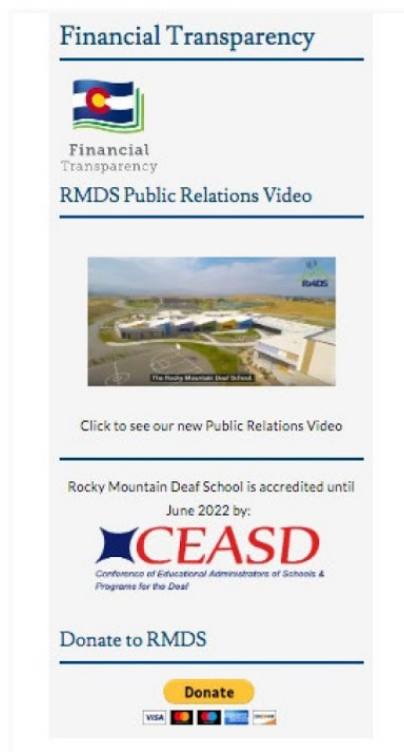
RMDSly yours, Amy J Novotny, Director



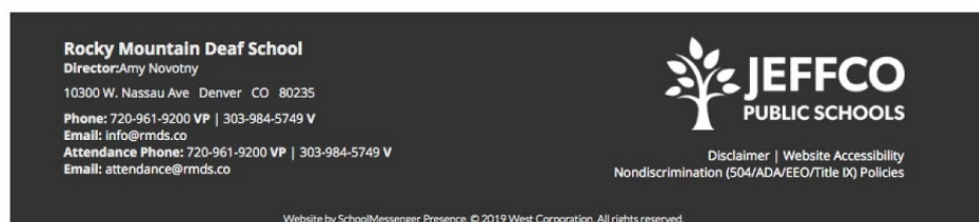
Shortcuts

- Academics
- Activities
- RMDS Board
- Jeffco Connect
- Financial Transparency
- RMDS Toddler Program

- It appears that their home page includes their most visited content, including shortcuts to other most commonly visited pages. So, in theory, visitors won't have to navigate through the entire site to get info that is on the most visited pages.



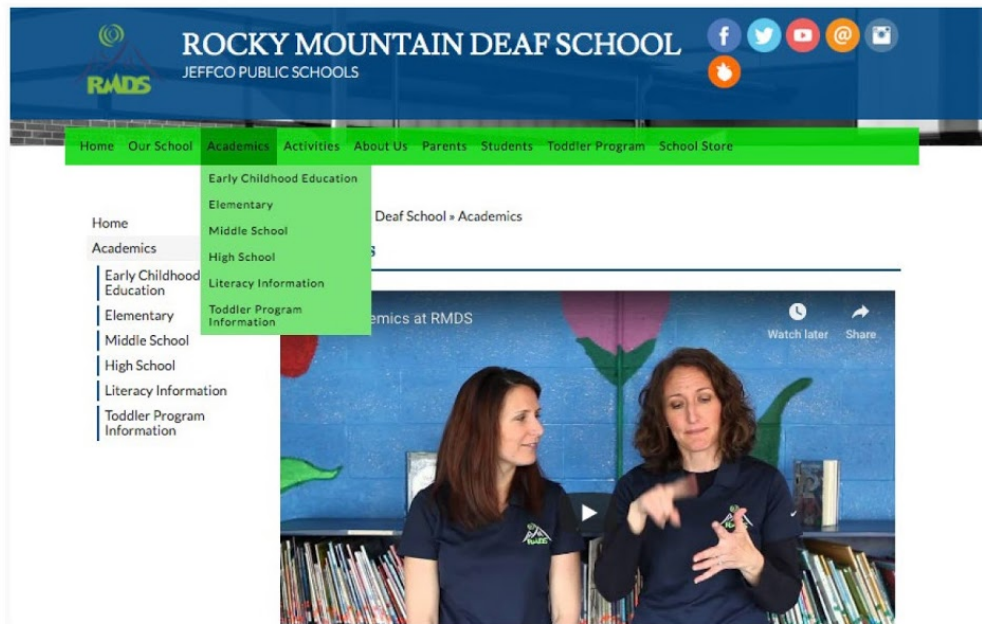
- On the home page, there is a link to Financial Transparency <https://jeffcormds.ss12.sharpschool.com/cms/One.aspx?portalId=1820905&pageId=2041591> and Donate.



- Footer is for their secondary important information — name of school and director, address, phone numbers, (both voice and VP) and most requested emails (info and attendance).
- Footer includes link to JeffCo Public Schools Website Accessibility statement. Great idea to link this in the footer of a website when some users may be visually impaired or blind.

Program Review
Colorado School for the Deaf and the Blind

August 2019



- In addition to being available in drop-down from top level navigation, second level pages also have text navigation on the left, so if someone is visually impaired and is tabbing through the website to get to content and not using their mouse, they can use that navigation instead.

Program Review
Colorado School for the Deaf and the Blind

August 2019





Home Our School Academics Activities About Us Parents Students Toddler Program School Store

Home
Staff
Board
FSSO / SAC







Rocky Mountain Deaf School » About Us » Staff

Staff








ADMINISTRATION

			
Amy Novotny Director anovotny@rmds.co	Eileen Kratzer Assistant Principal ekratzer@rmds.co	Stephanie Carson Student Engagement Program Coordinator scarson@rmds.co	Alison Talbert Business Manager atalbert@rmds.co







SUPPORT STAFF

					
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SPECIALISTS

						
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TEACHERS

					
Lisa Hann Early Childhood	Michelle Mansfield-Hom	Laurie Ross Lower Elementary	Rachel Benedict Upper Elementary	Allison Hawkins Upper Elementary	Jhani Amabile Upper Elementary

- Easy to find page listing all of their staff, including teachers and facility crew, on one page. Photos of staff are a nice touch.

Program Review
Colorado School for the Deaf and the Blind

August 2019

Summary for <https://rmds.jeffcopublicschools.org/>

- Reviewer was able to quickly find everything they were looking for and everything clicked on seemed to work seamlessly.
- The website followed the Best Practices outlined in this report.
- Every page of the website was not reviewed.

Shortcomings of <https://rmds.jeffcopublicschools.org/>

- The search function was very slow.
- When clicking on 'Our School,' 'Employment,' it takes one to an unsecure site: http://jeffcormds.ss12.sharpschool.com/our_school/employment

Website 2 of 2: Colorado Center for the Blind

<https://cocenter.org/>

Colorado Center for the Blind
Take Charge with Confidence and Self-Reliance

Toggle High Contrast
Toggle Font size

About the Center ▾ Our Programs ▾ Blog Calendar Donate ▾ Contact Us ▾

Home

Apply for 2019 Summer Youth Programs

There's a program for every age, interest and schedule! We're offering our 8-week No Limits to Learning program, as well as three shorter modules – "The World of Work," "Challenge & Adventure" and "Cracking the College Code"... Learn More »

Register Now for Summer Youth Program(s)

For the younger set, we'll have three Confidence BELL Academies across Colorado... Read More »

Register Now for NFB BELL Academy

Parents/Guardians will also need to:

Submit a permission form

The Latest:

Making Connections 2019 Agenda - Take an Early Look!

May 7, 2019 at 5:11 pm

AGENDA MAKING CONNECTIONS THAT WORK FOR YOU 3rd Annual Career and College Seminar Wednesday, May 8, 2019 9:00 am: Registration 9:45 am: Welcome and Opening Remarks: Julie Deden, Executive Director, Colorado Center for the Blind; Diane McGeorge, Board Chair and Founder of the Colorado Center for the Blind; Kathleen Conti, Arapahoe County Commissioner 10:00 am: [...] Read More ...

World-Renowned Training Center

Founded in 1988, the Colorado Center for the Blind is a world-renowned training center located at the foot of the Rocky Mountains in Littleton, Colorado, about 13 miles south of Denver.

Grounded in the National Federation of the Blind's positive philosophy of blindness, the Colorado Center for the Blind provides innovative teaching techniques, daily challenges and self-confidence that are the building blocks of independence, opportunity and success. Day after day, year after year, blind students leave the Colorado Center for the Blind's training program as living examples of the NFB's motto: "With effective training and opportunity, blind people can compete on terms of equality with their sighted peers."

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Click Here to DONATE NOW

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Apr 20, 2019

College Prep and Falafel @msudenver @ArapahoeCC »
Apr 14, 2019

April's FAST Saturday at @DenverArtMuseum #TactileTables »
Apr 5, 2019

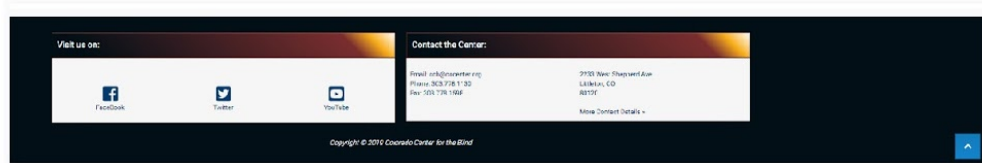
The Blind History Lady Talks to the Tuesday Seniors »
Mar 19, 2019

Meanwhile, down in the

- Nice feature on their home page: Toggle buttons for High Contrast and Font Size.
- The most recent action items ('Apply for summer programs' and a May 7 agenda) are on their home page, which is a nice feature. Suggest that they place the 'World-Renowned Training Center' info above those two items since WRTC describes what their center is about.
- All second level pages are available from top level navigation. None of them are linked in the footer.

Program Review
Colorado School for the Deaf and the Blind

August 2019



- Footer is for their secondary important information — Email, phone, fax, address, link to more contact details.
- The up arrow on the right side in the footer is a nice feature—click on it to take you back to the top of the page.

Summary for <https://cocenter.org/>

- Most everything the reviewer clicked on seemed to work seamlessly.
- The website followed most of the Best Practices outlined in this report.
- Every page of the website was not reviewed.

Shortcomings of <https://cocenter.org/>

- Their website URL starts with https:// (secure), however there is not a lock next to their URL so the site is not secure.
- Their calendar only has one listing—for a May 8 seminar. Calendars need to be up-to-date if they are featured on a website.
- There did not appear to be anything on the website directing them to a page or form to report accessibility issues.
- There did not appear to be anything about their finances or financial transparency on their website.
- Some of the pages, like the home page, were difficult to read because there is too much content. This would present a challenge to someone that is visually impaired.
- The Toggle Font Size feature does not make everything larger. For example, the font size in the boxes does not get larger, as well as some of the text on some of the pages. Same with the staff directory—the font size does not get larger.
- There did not appear to be any information about them being an accredited school.
- It appears that the Search function only works for their blog posts, not the entire website.

Program Review
Colorado School for the Deaf and the Blind

August 2019

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AERBVI. (2018). *Accreditation Standards Organizations and Schools*. Grand Rapids, Mich.: Association for the Education and Rehabilitation of the Blind and Visually Impaired.

CEASD. (2016). *School Improvement: A Protocol for Self-Study and Accreditation*. Washington Grove, Md.: Conference of Educational Administrators of Schools and Programs for the Deaf.

NASDSE. (2018). *Optimizing Outcomes for Students Who Are Deaf or Hard of Hearing: Educational Service Guidelines*. Alexandria, Va.: National Association of State Directors of Special Education.

APPENDIX A

Participants in the Program Review

Stakeholder Advisory Committee

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Colorado Consortium of Directors of Special Education

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Grandparent of a CSDB student
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Program Review
Colorado School for the Deaf and the Blind

August 2019

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Representative of Colorado Families for Hands & Voices

Julie Vinikoor

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Vance Youngs

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Executive Director
Washington State Center for Childhood Deafness and Hearing Loss

Lisa Humberd

Executive Director of Special Education
Widefield School District 3

Program Review
Colorado School for the Deaf and the Blind

August 2019

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Educational Consultant
National expert on B/VI education

Shauna Moden
Specialist in Deaf Education
CDE

Tera Wilkins
Director of Curriculum and Instruction
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Program Review
Colorado School for the Deaf and the Blind

August 2019

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Interim Executive Director
Rocky Mountain Cued Speech Association

Program Review
Colorado School for the Deaf and the Blind

August 2019

APPENDIX B

Report from Town-Hall Meetings and Online-Survey Analysis

Report to the Colorado Department of Education: Analysis of Data from Town Hall Meetings an Online Survey Regarding the Colorado School for the Deaf and Blind

Contents

Background.....	103
Data Sources and Analysis Methods.....	103
Survey and Town Hall Participation.	103
Summary of Key Findings.....	104
Areas of emphasis by role and location.	104
General themes identified.....	104
Co-occurrence of themes and codes.....	106
Authors' Contact Information.	106
 Appendix A: Word Cloud of Codes from Town Hall Analysis.....	 107
Appendix B: Idea List from Surveys and Town Halls	109

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At the University of Colorado Denver, School of Education & Human Development

CSDB Analysis for CDE – July 29, 2019 – DO NOT SHARE WITHOUT PERMISSION

Program Review
Colorado School for the Deaf and the Blind

August 2019

Kent Seidel, PhD, Eleanor Burns, EdD, and Joseph Spotts, doctoral candidate.

Background.

In spring 2019, a team commissioned by the Colorado Department of Education (CDE) collected data about the Colorado School for the Deaf and Blind (CSDB) through town hall meetings held in Colorado Springs, Grand Junction, and Adams County, and through an online survey. Parents, community members, members of advocacy groups, and educators from CSDB and local schools and districts were invited to participate. On June 7, the Colorado Department of Education contracted with the Center for Practice Engaged Education Research (C-PEER) at the University of Colorado Denver to provide analysis of these data. A preliminary report of themes identified was shared with the CSDB board for discussion and input at a 7/29 meeting. Receiving no specific questions or concerns, the C-PEER team created this final report for submission to CDE.

Data Sources and Analysis Methods.

The C-PEER team cleaned and organized the survey data (comprised of responses to nine open-ended questions about the day/residential programs, the outreach programs, and ideas for improving services) for analysis along with the transcripts of the town hall meetings. The qualitative data were coded for common themes and analyzed for the most important recurring themes across the different town hall sites, the survey, and for the types of respondents—advocacy group members, parents (subdivided further into parents of deaf/HH and blind/VI students), community members, and educators. Analysis was conducted by three researchers using Dedoose, a secure cloud-based qualitative analysis program. An initial cross-coding session wherein all three researchers coded the same material, then compared and calibrated for inter-coder reliability, resulted in finalizing the codes and reaching an agreement level threshold of greater than 80%. The researchers then completed coding of the data and analyzed resulting codes across all sources.

Survey and Town Hall Participation.

Table 1 below lists the numbers of responses to the surveys, by role type. We were not provided specific data about numbers and roles of town hall participants. One concern about the open-ended survey questions, for future consideration, is the number of potential respondents that began the survey but abandoned it, presumably not wishing to make the effort for open ended responses. This is not uncommon, but can be avoided through different survey design.

Respondent Group (self-ID)	Valid survey responses	Started, but abandoned	Total N	% false starts
Advocacy	11	10	21	48%
Community	30	52	82	63%
Educator	100	70	170	41%
Parent of D/HH child	10	12	22	55%
Parent, D/HH w CSDB services	22	16	38	42%

Program Review
Colorado School for the Deaf and the Blind

August 2019

Parent of B/VI child	1	0	1	0%
Parent, B/VI w CSDB services	1	2	3	67%

Table 1. Survey participation.

Overall, the survey data presented responses from 175 individuals, comprised of 11 advocacy group members (6%); 30 community members (17%); 34 parents (19%); and 100 educators (57%). The findings we report below have been checked for representativeness across all groups, especially considering that educators outnumbered other groups.

Summary of Key Findings.

Areas of emphasis by role and location.

Code findings were sorted for analysis by role (community member, educator, advocacy group member, parents) and by location of town halls (Adams, Colorado Springs, Grand Junction), to see if concerns and emphases differed.

There were few respondents identifying as “advocacy group member” and so the code analysis for role focuses on similarities and differences among community members, parents, and educators. For the most part, these groups were quite similar, and we present overall general themes below. There was, however, some distinction in emphasis areas. In particular, “educators” were much more likely to note a concern with language acquisition, programming, and need for more emphasis on academic preparation. Parents, educators, and community members all shared top concerns about needing more resources; language acquisition efforts (including expanded ASL and other language training resources); the need for collaboration among agencies, schools, districts, CSDB, and the state; the need for better outreach and communication; and a need for greater emphasis on academic preparation of students.

By location of town halls, Adams and Colorado Springs expressed greater concerns about academic preparation and co-curricular programs than did Grand Junction, and Adams and Grand Junction expressed greater concerns about lack of resources, including access to ASL training. All locations expressed a need for better outreach, more collaboration, and more resources generally, and many noted the need to support the socio-emotional aspects of supporting deaf/blind students in schools and for families.

General themes identified.

We have identified the themes that stood out as most common across all data sources, and present these below. Occasionally, we include an example quote from a survey response or town hall participant that we feel illustrates the essence of the theme. We present these five theme areas in the order of their likely importance, as represented by the range and depth of mentions by survey and town hall participants.

Resources.

- The western slope feels like more resources are needed. Collaboration is also difficult to since there doesn’t appear to be an easily accessible network, so advocacy groups don’t

know how to combine resources and work together. “I feel like there needs to be a little more on the Western Slope... I know we don’t have a huge population of deaf and hard of hearing children but it is important to have all options available for our children.” “Programs come and go in Grand Junction and it’s exhausting for parents to keep up with available services. Compiling them could be hugely advantageous especially for rural areas where information can be harder to come by.”

- A theme present in both survey and town hall data was that people thought there was a lack of resources for deaf and blind students. Respondents think there needs to be more funding for programs, more training for families across the state, more online resources, more access to technology and more extra-/co-curricular program supports.

CSDB & Government Services.

- Parents seem unclear which services are provided by CSDB and which are government or other district services.
- Parents are concerned that there are not enough deaf/HH and blind/VI people working in the offices that provide services to them.
- Parents would like CSDB to provide resources to match them with government services and community programs.
- Transitioning out of government and CSDB services is difficult for deaf and blind students.

Academics.

- Parents thought CSDB did not have rigorous academic standards and suggested there was a lack of curriculum. “CDSB needs to raise the bar on the academics. I mean, on every level. Especially high school... And getting into high school, and things start to get competitive, there is a gap that widens.” More than ¼ of respondents (27%) suggested that academics need to be addressed.
- A substantial portion (14%) of survey respondents mentioned a lack of accountability. One parent suggested that CSDB work to create “really good standards [for deaf and blind children] that we as a state can adhere to.”
- Parents want CSDB education to include a wide range of skills including life skills and deaf and blind history.

Social Emotional Learning.

- Parents and community members were positive about the community and social group building provided by CSDB. “That socioemotional piece that is so huge for deaf and blind, they are getting that from CSDB.”
- Students who attended CSDB had a strong sense of belonging and strong language acquisition but lacked strong academics. Students who “mainstreamed” often touted the academics, but did not feel a sense of belonging. CSDB’s programs helped fill that gap.

Program Review
Colorado School for the Deaf and the Blind

August 2019

- One of the important functions CSDB provides is giving deaf and blind students positive role models. “They’re all role models. They’re able to model what can be done. They teach a variety of subjects, and as far as CSDB goes, it’s a model for how we teach deaf kids.”

Language Acquisition.

- Children from Spanish speaking homes are required to learn three languages (ASL, English and Spanish) but this does not seem to be explicitly supported.
- More than 1/3 of respondents (37%) mentioned CSDB supports both ASL and oral language acquisition, which is generally appreciated.
- Many survey respondents mentioned that CSDB could improve communications about options, helping to ensure all options are presented early to parents.
- *Hands and Voices* is viewed as contentious by a vocal subset of participants, suggesting it advocates for learning speech for deaf students instead of ASL.

Co-occurrence of themes and codes.

By looking at places where respondents emphasized two or more themes in conjunction, we are able to provide some insights about how the town hall and survey respondents are thinking about these themes, and which themes inform each other.

We find that “resources” and “outreach” as well as “collaboration” co-occur most often. Reviewing the survey responses and town hall statements, it is clear that participants consider these to be closely connected—there is a general view that resources could become more efficient and effective with better collaboration and coordination among various providers, and better outreach and communication about what is available.

The other common cluster is among “Language Acquisition,” “Academics,” and “SEL supports” which we interpret to mean that all respondents consider these both important and necessary supports for each other. There is a sense of urgency around supporting better access to supports for language development (including both varied options and bilingual supports) which can help support improved academic development. Social emotional supports are seen as key to both family and student supports. SEL support statements are also closely related to some respondents’ mention of the need for more role models, family events, and continuing to develop a sense of belonging that many see as an important aspect of CSDB’s work.

Authors’ Contact Information.

This work was conducted by the staff of the Center for Practice Engaged Education Research (C-PEER) at the University of Colorado Denver, School of Education & Human Development, under direction of C-PEER Director Kent Seidel. Any questions about the data analysis and findings should be directed to Dr. Seidel, at: kent.seidel@ucdenver.edu.

Program Review
Colorado School for the Deaf and the Blind

August 2019

Appendix A: Word Cloud of Codes from Town Hall Analysis (these codes were identified in the data; larger lettering = stronger emphasis and more respondents mentioning the code).

Program Review
Colorado School for the Deaf and the Blind

August 2019



Program Review
Colorado School for the Deaf and the Blind

August 2019

Appendix B: Idea List from Surveys and Town Halls

Expanded ASL and related learning options for families. Go “beyond the basics,” offering parents and staff and community members accessible and affordable ways to become more fluent.

Consider expanding online resources as well – Facetime or Zoom and other platforms for interactions with and among parents, coaching, etc. This could be a partial solution to another key theme, that of rural sites around the state feeling like they cannot access services and supports.

Expand resources for bilingualism, supporting ASL and English as well as help for families with a first language other than English. Spanish/ASL would be a good place to start.

The family events are popular, and respondents would like more opportunities for children and families to connect.

Organize resources about the many aspects and options in supporting deaf/HH and blind/impaired children within families. A one-stop resource list.

Work to better connect schools, districts, and advocacy/community organizations that may have services of value to families, with CSDB and with each other. Families find the “turf” and disconnects confusing and frustrating.

Specific services that respondents feel CSDB should / could offer include:

- Some regular event or online webinar(s) that provide the latest research and best practices, for parents as well as school professionals.
- Sports and other co-curricular activities, as well as transitional services.
- Improve the curriculum resources, especially in literacy, mathematics, college preparation, life skills, and history of the deaf/blind communities.
- Expand access to mentors and role models, perhaps through volunteer programming.
- More intentional supports for social emotional learning and mental health supports, including resources for families.
- Improve the communication about all the services that CSDB and related / partner agencies offer – there is a lot of confusion and/or lack of awareness about what is already available.
- Work to extend the many services and supports provided to younger children into later grades/ages.
- Assuming that CSDB and its partners are supposed to play an advocacy role in support of the children and families they serve (there is a vocal subset of respondents that question this), then better organizing such advocacy efforts and making them more visible to communities is recommended.

APPENDIX C

Website-Review Report

Review of the Website for the
Colorado School for the Deaf and Blind
(CSDB) <https://www.csdb.org>
by Doris Boardman

May 2019

Table of Contents

Executive Summary	111
Government/Industry Standards	112
Accessibility Analysis of the CSDB Website	113
Website Best Practices	116
Analysis of Other Websites	118
Summary and Recommendations	126
Opportunities	133

Program Review
Colorado School for the Deaf and the Blind

August 2019

Executive Summary

Background and Purpose

The review of the CSDB website was requested by Elliott Asp, Ph.D., Senior Partner at the Colorado Education Initiative to support the Department of Education's program review of the CSDB. While reviewing the school, it was recommended that the website also be reviewed for website strengths and gaps (areas for focus/growth).

Objectives

- Evaluate the website for ease of use by stakeholders.
 - Students, teachers, parents, community members, deaf/blind or hard-of-hearing/visually impaired
- Consider expectations of users visiting an educational website, including stakeholders, departments, financial operations, staff members and contact information.
- Analyze accessibility of the website in regard to Web Content Accessibility Guidelines.
- Compare the website to other non-CSDB websites for usability, accessibility and clarity strengths and shortcomings.
- Identify the most noticeable or important short-term improvements for the CSDB website.
- Provide long-term and ongoing continuous improvement recommendations.

Reviewer Qualifications

Doris Boardman is the Website and SEO Manager for Denver Botanic Gardens. The website is www.botanicgardens.org and has over 7.2 million pageviews a year. She has worked at the Gardens for 19 years and has been managing the Gardens' website for 18 years.

Her roles include:

- Writing content for and updating the website daily, working with internal and external stakeholders.
- Overseeing usability, SEO, quality assurance and accessibility of the website.
- Supervising three complete redesigns of the website, involving all internal Gardens' departments, outside agencies, copywriters, usability experts and SEO experts.
- Working with an outside digital agency for website design and development.
- Working with an internal Gardens' marketing team, including graphic designers, a branding expert and a social media expert.
- Creating the Gardens social media accounts in 2009.

Program Review
Colorado School for the Deaf and the Blind

August 2019

Government/Industry Standards

Web Content Accessibility Guidelines (WCAG), including WCAG 2.0 and WCAG 2.1

Website accessibility is actively designing, developing, and creating content in such a way that it does not hinder any person from interacting with the website.

– Web Access Initiative (WAI)

WCAG2 guidelines are categorized into three levels of conformance in order to meet the needs of different groups and different situations: A (lowest), AA (mid range), and AAA (highest).

WCAG has 12 guidelines that are organized under four principles: perceivable, operable, understandable and robust. For each guideline, there are testable success criteria, which are at three levels: A, AA and AAA.

WCAG2 at a Glance

Perceivable

- Provide [text alternatives](#) for non-text content.
- Provide [captions and alternatives](#) for audio and video content.
- Make content [adaptable](#); and make it available to assistive technologies.
- Use [sufficient contrast](#) to make things easy to see and hear.

Operable

- Make all functionality [keyboard accessible](#).
- Give users [enough time](#) to read and use content.
- Do not use content that causes [seizures](#).
- Help users [navigate and find](#) content.

Understandable

- Make text [readable and understandable](#).
- Make content appear and operate in [predictable](#) ways.
- Help users [avoid and correct mistakes](#).

Robust

- Maximize [compatibility](#) with current and future technologies.

Summary

- Accessibility results in a better website and in increased SEO. Accessibility is a process, not a project. Serving your website visitors with the best experience possible is always the right thing to do.
- There are [governmental policies in place](#) related to web accessibility, such as websites should adhere to Americans with Disabilities Act of 1990 (ADA).
- [There are some lawsuits and complaints being filed that are related to website accessibility](#). The majority of these are in relation to websites being inaccessible for people with vision impairment or blindness.
- Following WCAG guidelines will help to get any website compliant with accessibility issues.

Program Review
Colorado School for the Deaf and the Blind

August 2019

Accessibility Analysis of the CSDB Website

Free accessibility evaluation tools were used and testing was done using multiple tools. Audits were done on the CSDB home page.

Summary

All of these audits find the home page to be very accessible with a few exceptions. There were no urgent issues that need to be addressed in all of the results. A developer would need to be involved to help you address all of these issues.

Note: Results from free evaluation tools usually have higher scores than when one is using a paid tool. Paid tools more clearly explain what the issues are, and they also tell you if the issue is a level A, AA or AAA criteria. An added benefit of using a paid tool is that you get reports for the entire site, not just one page at a time.

1. Tool: <https://achecker.ca/checker/>

Webpage checked: <https://www.csdb.org/>

Using WCAG 2.0 (Level AA) guidelines

See CSDBhomepage_achecker_2019-05-17.pdf report

- No major issues found
- Found 79 potential problems

I also tested several other pages however got almost the same results. It appears that a lot of the potential issues found have to do with the right side and the social networking icons that appear on all pages.

2. Tool: <https://fae.disability.illinois.edu>

Webpage checked: <https://www.csdb.org/>

Using the WCAG W3C 2.0 Level A and AA requirements

Report:

<https://fae.disability.illinois.edu/pages/16ac7289635da74d/gl/all/page/1/>

- Under the WCAG Guidelines tab, the violations and warnings are very clear if one clicks on each rule group in the report linked above. There were 4 violations and at least 1 warning. They suggest you perform 45 manual checks. 22 rules passed.
- 'Interactive functionality must be keyboard operable' had a lot of red flags. They suggest manually verifying that the functionality provided by the links, form controls, elements with event handlers and/or embedded applications is operable through the keyboard.
- There were a few other things flagged for you to manually check.

Program Review
Colorado School for the Deaf and the Blind

August 2019

3. Tool: Chrome DevTools, Lighthouse

Webpage checked: <https://www.csdb.org/>

Audit, Accessibility guidelines

Audits were done for desktop only.

The reviewer found this free tool to be the most thorough.

- **Accessibility - scored an 82 out of 100.** These checks highlight opportunities to improve the accessibility of your web page. Only a subset of accessibility issues can be automatically detected so manual testing is also encouraged.
- Passed 18 audits under Accessibility.
- Found these things that may need to be addressed:
 - Names and labels - These are opportunities to improve the semantics of the controls in your application. This may enhance the experience for users of assistive technology, like a screen reader. Form elements do not have associated labels. Labels ensure that form controls are announced properly by assistive technologies, like screen readers. How to fix this:
<https://dequeuniversity.com/rules/axe/3.1/label?application=lighthouse>
 - Tables and lists - These are opportunities to improve the experience of reading tabular or list data using assistive technology, like a screen reader. Two lists do not contain only elements and script supporting elements (<script> and <template>). Screen readers have a specific way of announcing lists. Ensuring proper list structure aids screen reader output. How to fix this:
<https://dequeuniversity.com/rules/axe/3.2/list>
 - Failing Elements: <ul class="social-networks">
List items () are not contained within or parent elements. Screen readers require list items () to be contained within a parent or to be announced properly. How to fix this:
<https://dequeuniversity.com/rules/axe/3.1/listitem?application=lighthouse>
- Google Dev conducted another 11 audits suggesting other things that need to be checked manually. Go to Chrome DevTools, Accessibility, “**Additional items to manually check**” to see this list. How to access Chrome DevTools: <https://developers.google.com/web/tools/chrome-devtools/accessibility/reference>

While in Chrome DevTools, this audit was also performed:

- **Best Practices - scored a 71 out of 100.**
- Links to cross-origin destinations are unsafe. Add `rel="noopener"` or `rel="noreferrer"` to any external links to improve performance and prevent security vulnerabilities. This was for Facebook, Twitter, YouTube and Linked In links. How to fix this:
<https://developers.google.com/web/tools/lighthouse/audits/noopener>

Program Review
Colorado School for the Deaf and the Blind

August 2019

- Includes front-end JavaScript libraries with known security vulnerabilities, one vulnerability detected. Some third-party scripts may contain known security vulnerabilities that are easily identified and exploited by attackers. This is for [jQuery@1.12.4](#) and was marked medium vulnerability. How to fix this:
<https://developers.google.com/web/tools/lighthouse/audits/vulnerabilities>
- Browser errors were logged to the console - Errors logged to the console indicate unresolved problems. They can come from network request failures and other browser concerns.
 - URL and Description
<https://www.csdb.org> - Unchecked runtime.lastError: The message port closed before a response was received.
 - /down-red.gif (www.csdb.org) - Failed to load resource: the server responded with a status of 404 ()
 - /right-red.gif (www.csdb.org) - Failed to load resource: the server responded with a status of 404 ()
- Displays images with incorrect aspect ratio - Image display dimensions should match natural aspect ratio. How to fix this:
<https://developers.google.com/web/tools/lighthouse/audits/aspect-ratio>
- Passed another 11 audits under Best Practices.

While in Chrome DevTools, this audit was also performed:

- **SEO - scored a 90 out of 100.** These checks ensure that your page is optimized for search engine results ranking. There are additional factors Lighthouse does not check that may affect your search ranking.
- Content Best Practices - Format your HTML in a way that enables crawlers to better understand your app's content. Document does not have a meta description.
- Mobile Friendly - Make sure your pages are mobile friendly so users don't have to pinch or zoom in order to read the content pages. Some tap targets are not sized appropriately. There are 97% appropriately sized tap targets. Interactive elements like buttons and links should be large enough (48x48px), and have enough space around them, to be easy enough to tap without overlapping onto other elements. How to fix this:
<https://developers.google.com/web/fundamentals/accessibility/accessible-styles#multi-device-responsive-design>
- Passed another 10 audits under SEO.

Program Review
Colorado School for the Deaf and the Blind

August 2019

Website Best Practices

There are many lists of best practices out there, however this is a very comprehensive one. This list was taken from [Forbes.com](https://www.forbes.com).

1. **Fast Loading** - *No one wants to wait (and wait and wait) for your site to load. Design sites with prompt loading times for all users on all devices (even the ones with slower Internet connections).*
2. **Mobile Ready** - *Virtually everyone uses smart devices on a daily basis. Create an engaging, mobile-friendly design that your audience can access whenever they want, wherever they roam.*
3. **Tracking Enabled** - *Analytics matter--it's the best way to determine that your website is actually doing its job. The final design should include functionality to gauge key indicators such as traffic, goals, and conversions.*
4. **SEO Savvy** -- *Don't underestimate the power of optimizing your site for both browsers and humans. Develop compelling, readable content for your followers. For the search engines, always include all important on-page SEO tags and elements, including schema and XML sitemaps.*
5. **Enabled Content Management System (CMS)** -- *We aren't quite done with the power of the written word just yet. Consistently publishing fresh, original content not only captivates your audience, it can deliver invaluable, long-term digital marketing momentum.*
6. **Email Marketing** -- *Yes, email marketing is still a thing--and a highly effective thing at that. A site's email capture forms should sync with the client's email marketing system for seamless access and connection.*
7. **Social Media** - *Never miss an opportunity to leverage the power of social media. Integrate all relevant social media platforms within your design. Allowing users to quickly access social media pages from the website instantly broadens a brand's reach and helps increase visibility and traffic.*
8. **Strong Security** - *Never compromise on-site security. Every design should include fundamental security and privacy protocols, such as basic security checks, to protect client and user data.*

Here are some other best practices from [Greengeeks.com](https://www.greengeeks.com) blog.

1. **Keep image sizes low** - *Image sizes play a crucial role in the performance of any website. Of all the elements you can add, photos are often the ones that take the most time to load. This is why it's important to keep images sizes as low as possible. The goal of any website is to load within three seconds. This is because most people will abandon a website if it doesn't.*

Program Review
Colorado School for the Deaf and the Blind

August 2019

2. **Guide easy decision making** - Offering visitors too many options has potential to slow the decision-making process or even confuse indecisive consumers.
3. **Incorporate More Video** - incorporating more of this in your website design is beneficial for engaging visitors. About 55% of people who watch videos do so in their entirety, which is more than any other type of content.
4. **Keep an Eye on Visitor Interaction** - Keeping a close eye on data is invaluable when designing a site for your target audience. However, it goes deeper than using Google Analytics reports to power your data collection. Visits are one thing, but how are people actually using your website? Tools like heatmaps are quite useful as they show you where people are clicking, scrolling and reading on your site. This information can help you restructure the design while making sure important elements are always in the field of view.
5. **Don't Underestimate the Power of CMS** - Content Management Systems, or CMS, are powerful tools to get a site up and running in as little time as possible. Systems like WordPress are also completely customizable and are capable of becoming virtually anything you want. To put this into perspective, WordPress is used in more than 31% of all monitored websites on the Internet. This is mostly because of how easy, flexible and designer-friendly the system is.

When going over your website design best practices checklist, keep the users in mind. It's not about what you want to see on the site, but more of what they want to experience.

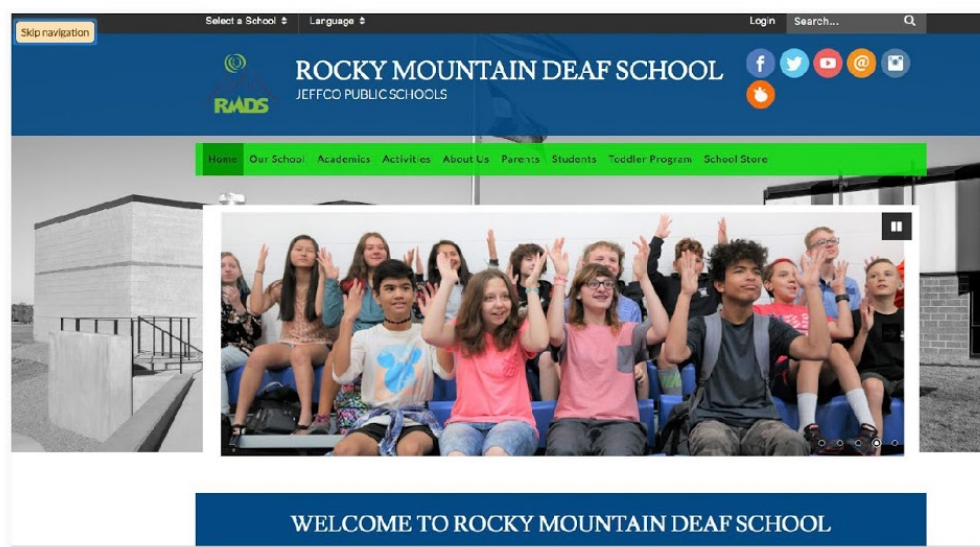
Analysis of Other Websites

This analysis is to compare the csdb.org website with similar websites and highlight things that work well on those websites. This may assist CSDB in realigning some assets on their current website with best practices. It also supports the comparison to make content appear and operate in predictable ways.

A formal accessibility analysis of these websites was not completed. There was not a review of these websites as a deaf/blind or hard-of-hearing/visually impaired person.

Website 1 of 2: Rocky Mountain Deaf School

<https://rmds.jeffcopublicschools.org/>



- Nice large images in the rotation on their home page.
- 'Skip Navigation' option is very easy to see when one hits 'Tab.'
- All second level pages are available from top level navigation. None of them are linked in the footer.

Program Review
Colorado School for the Deaf and the Blind

August 2019

What's Happening



Join the RMDS Team

Looking for fun, energetic, individuals! We are looking for an ECE Teacher and a para professional to join the RMDS team.

[Read More](#)



RMDS Summer Camp

June 3-14 from 8:30 a-4:30 p. See flyers and get registration form here.

[Read More](#)



2018-2019 Toddler Program

Join us for our Toddler Programs.

[Read More](#)

Upcoming Events

MAY
21

Elementary: Soccer Practice
3:30PM - 4:45PM

MAY
22

4th Q: Elementary Wed Club: Feel the Beat
3:30PM - 4:45PM

MAY
23

End of 4th Quarter
All Day

MAY
23

Elementary: Soccer Practice
3:30PM - 4:45PM

MAY
23

RMDS Fashion Show
7:00PM - 8:00PM

[More Events](#)

←

MAY 2019

→

S	M	T	W	T	F	S
28	29	30	1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	1

[Go to Full Calendar →](#)

Superintendent's Message

Welcome Rocky Mountain Deaf School website! This is a place where we share our school's programs and services. I am delighted to invite you to explore our website.

What sets RMDS apart from other schools and programs is our dedication to our students. Our staff members who all are highly qualified work tirelessly to provide academic, career and extracurricular opportunities for our students. It is RMDS's goal to provide our students the foundation by which students can continue to gain greater knowledge and skills to become a great citizen after they leave RMDS. In this place, students feel inspired to think, to learn, to achieve and to care.

I hope you learn more about RMDS and visit our site often for updates. Come for a visit and tour our new school building.

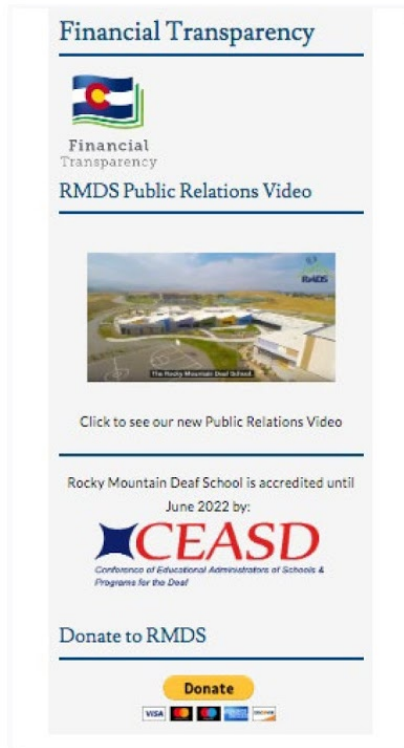
RMDSly yours, Amy J Novotny, Director



Shortcuts

- Academics
- Activities
- RMDS Board
- Jeffco Connect
- Financial Transparency
- RMDS Toddler Program

- It appears that their home page includes their most visited content, including shortcuts to other most commonly visited pages. So, in theory, visitors won't have to navigate through the entire site to get info that is on the most visited pages.



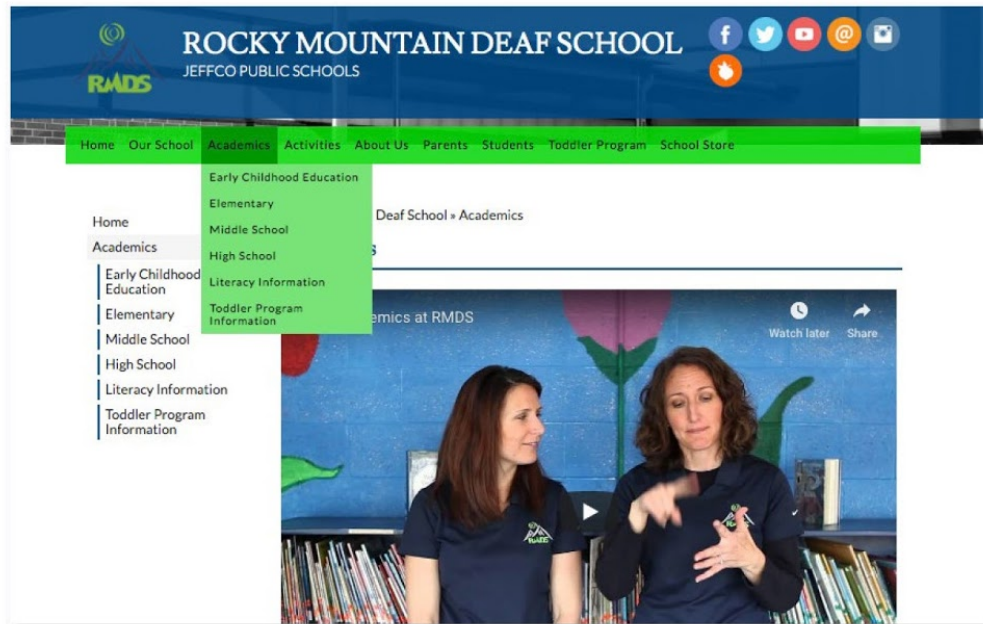
- On the home page, there is a link to Financial Transparency <https://jeffcormds.ss12.sharpschool.com/cms/One.aspx?portalId=1820905&pageId=2041591> and Donate.



- Footer is for their secondary important information — name of school and director, address, phone numbers, (both voice and VP) and most requested emails (info and attendance).
- Footer includes link to JeffCo Public Schools Website Accessibility statement. Great idea to link this in the footer of a website when some users may be visually impaired or blind.

Program Review
Colorado School for the Deaf and the Blind

August 2019



- In addition to being available in drop-down from top level navigation, second level pages also have text navigation on the left, so if someone is visually impaired and is tabbing through the website to get to content and not using their mouse, they can use that navigation instead.

Program Review
Colorado School for the Deaf and the Blind

August 2019





Home Our School Academics Activities About Us Parents Students Toddler Program School Store

Home
Staff
Board
FSSO / SAC







Rocky Mountain Deaf School » About Us » Staff

Staff








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SPECIALISTS

						
Susie Broderick Toddler Program Co-coordinator sbroderick@rmds.co	Lisa Hann Spoken English Literacy lhann@rmds.co	Cheryl Richardson, Motor Therapist crichardson@rmds.co	Amber Rush School Psychologist arush@rmds.co	Suzanne Sharpe Speech Language Pathologist ssharpe@rmds.co	Jeni Jackerson ASL Specialist jjackerson@rmds.co	Joyc As jbrub@rmds.co

TEACHERS

					
Lisa Hann Early Childhood	Michelle Mansfield-Hom	Laurie Ross Lower Elementary	Rachel Benedict Upper Elementary	Allison Hawkins Upper Elementary	Jhani Amabile Upper Elementary

- Easy to find page listing all of their staff, including teachers and facility crew, on one page. Photos of staff are a nice touch.

Program Review
Colorado School for the Deaf and the Blind

August 2019

Summary for <https://rmds.jeffcopublicschools.org/>

- Reviewer was able to quickly find everything they were looking for and everything clicked on seemed to work seamlessly.
- The website followed the Best Practices outlined in this report.
- Every page of the website was not reviewed.

Shortcomings of <https://rmds.jeffcopublicschools.org/>

- The search function was very slow.
- When clicking on 'Our School,' 'Employment,' it takes one to an unsecure site: http://jeffcormds.ss12.sharpschool.com/our_school/employment

Program Review
Colorado School for the Deaf and the Blind

August 2019

Website 2 of 2: Colorado Center for the Blind

<https://cocenter.org/>

The screenshot shows the homepage of the Colorado Center for the Blind. At the top, there is a navigation bar with links: About the Center, Our Programs, Blog, Calendar, Donate, and Contact Us. To the right of the navigation bar are two buttons: 'Toggle High Contrast' and 'Toggle Font size'. Below the navigation bar, the main content area is divided into several sections. On the left, there is a section titled 'Home' with a sub-header 'Apply for 2019 Summer Youth Programs'. This section contains text about the program, a photo of students white water rafting, and buttons for 'Register Now for Summer Youth Program(s)', 'Register Now for NFB BELL Academy', and 'Submit a permission form'. Below this is a section titled 'The Latest:' with a sub-header 'Making Connections 2019 Agenda - Take an Early Look!'. This section includes a date 'May 7, 2019 at 5:11 pm' and a detailed agenda for a seminar on Wednesday, May 8, 2019. To the right of the main content area is a 'Search' bar and a 'Get Involved' section with buttons for 'Sign Up for our FREE NEWSLETTER', 'Share Your Time & Talent - VOLUNTEER', and 'Click Here to DONATE NOW'. Below the 'Get Involved' section is a 'Recent News' section with four news items, each with a photo and a date: 'Signs of Spring' (Apr 20, 2019), 'College Prep and Falafel' (Apr 14, 2019), 'April's FAST Saturday at' (Apr 5, 2019), and 'The Blind History Lady Talks to the Tuesday Seniors' (Mar 19, 2019). At the bottom of the page, there is a section titled 'World-Renowned Training Center' with a photo of students working and a paragraph about the center's history and mission.

- Nice feature on their home page: Toggle buttons for High Contrast and Font Size.
- The most recent action items ('Apply for summer programs' and a May 7 agenda) are on their home page, which is a nice feature. Suggest that they place the 'World-Renowned Training Center' info above those two items since WRTC describes what their center is about.
- All second level pages are available from top level navigation. None of them are linked in the footer.

Program Review
Colorado School for the Deaf and the Blind

August 2019



- Footer is for their secondary important information — Email, phone, fax, address, link to more contact details.
- The up arrow on the right side in the footer is a nice feature—click on it to take you back to the top of the page.

Summary for <https://cocenter.org/>

- Most everything the reviewer clicked on seemed to work seamlessly.
- The website followed most of the Best Practices outlined in this report.
- Every page of the website was not reviewed.

Shortcomings of <https://cocenter.org/>

- Their website URL starts with https:// (secure), however there is not a lock next to their URL so the site is not secure.
- Their calendar only has one listing—for a May 8 seminar. Calendars need to be up-to-date if they are featured on a website.
- There did not appear to be anything on the website directing them to a page or form to report accessibility issues.
- There did not appear to be anything about their finances or financial transparency on their website.
- Some of the pages, like the home page, were difficult to read because there is too much content. This would present a challenge to someone that is visually impaired.
- The Toggle Font Size feature does not make everything larger. For example, the font size in the boxes does not get larger, as well as some of the text on some of the pages. Same with the staff directory—the font size does not get larger.
- There did not appear to be any information about them being an accredited school.
- It appears that the Search function only works for their blog posts, not the entire website.

Program Review
Colorado School for the Deaf and the Blind

August 2019

Summary and Recommendations for CSDB.org

Summary

1. Almost everything the reviewer clicked on seemed to work seamlessly.
2. Follows most of the Best Practices outlined in this report.
3. Most of the pages are accessible using secure HTTPS. The few exceptions are noted in recommendations.
4. Google Analytics tracking is enabled.
5. It appears that an SEO tool <http://www.seodesignsolutions.com/wordpress-seo/> is being utilized.
6. The recommendations below are all to increase accessibility and clarity.

Accessibility and clarity issues to be addressed now

1. Some images do have alt text/title text content (this text is used by screen readers, search engines or when the image cannot be loaded. The title is used as a tool tip when the user hovers the mouse over the image). Add those to the rest of the images on the website and use them going forward on all images.



2. Make sure you are using unique meta tags/page titles on all pages. For example, when the reviewer did a Google search for 'school for blind,' this is what showed up:

Colorado School For The Deaf and The Blind: Home

<https://www.csdb.org/>

Five boys, in the School for the Blind, pose with brailier The Colorado School for the Deaf and the Blind (CSDB) is a state-funded school within the Colorado ...

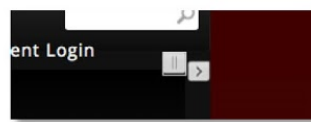
[Careers](#) · [School for the Blind](#) · [Staff](#) · [School for the Deaf](#)

The home page does not have a meta tag/page title since it is just automatically pulling in content from the top of the page. Meta tags are snippets of text that describe a page's content; the meta tags don't appear on the page itself, but only in the page's code. They are little content descriptors that help tell search engines know what a web page is about.

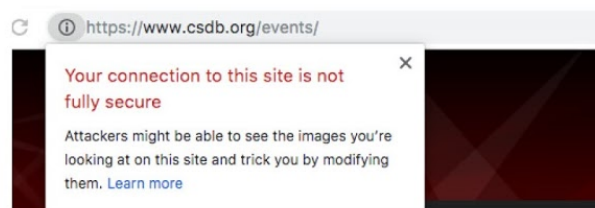
Program Review
Colorado School for the Deaf and the Blind

August 2019

3. When clicking on 'Staff' in the footer and get to linked page, 'Access to [Staff email](#)' link does not work.
4. Reviewer could not easily find a list of all staff and a way to contact them directly. The generic form that one fills out to reach a staff member is not a transparent or personal way to reach staff from a school website. Consider linking directly to their emails instead. Here are examples:
<https://rmds.jeffcopublicschools.org/cms/One.aspx?portalId=1820905&pageId=1996295>
<https://east.dpsk12.org/staff/directory/>
5. Reviewer could not find a list of staff for the School for the Blind with contact info on <https://www.csdb.org/programs-services/school-blind-2/>. This information needs to be added, similar to what is done for the School for the Deaf.
6. Pause button for the image carousel at the top of the home page sometimes does not work, and it is too close to the 'next' arrow to the right of it.



7. Remove 'Login' from the footer. There should be another secure way that is not visible to the public for the CSDB staff web content admin to get to the WordPress admin login page.
8. Right side links
 - a. The Location page is not secure: <http://www.csdb.org/campus-location/>
 - b. On the Location page, link to a Google map with 'Get directions' as the text) The URL is
<https://www.google.com/maps/place/33+N+Institute+St.+Colorado+Springs,+CO+80903/@38.8344186,-104.8094218,17z/data=!3m1!4b1!4m5!3m4!1s0x87134504f1a232af:0x3e4d2dcbf2e2e7c7!8m2!3d38.8344186!4d-104.8072278>
 Better yet, embed a Google map so that they can get directions from their location to your location.
 - c. The calendar page is HTTPS, however it appears it is not secure: <https://www.csdb.org/events/>. There is no lock tool shown to the left of the URL.



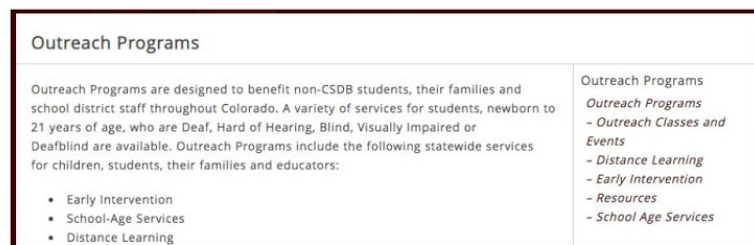
Program Review
 Colorado School for the Deaf and the Blind

August 2019

- d. The Alumni page is not secure: <http://www.csdb.org/alumni/>



9. On the right side of the Outreach Programs page, 'Outreach Programs' is listed twice in the text above the links to the programs page. It should just be there once.



10. On the schools menu page, put contact info after this sentence at the top of the page:
'Your feedback is important and helps to meet the nutritional needs and requirements of the students we serve.'
11. Not everyone has Word or Excel, or has the versions that you have linked from your website. They all have Acrobat Reader or easy access to download that program. For accessibility and to track open rates in Google Analytics, make all Word and Excel documents PDFs and make sure they are accessible using the [Acrobat accessibility checker feature](#).

Here are the pages that have Word and Excel docs:

- <https://www.csdb.org/parent-information-page/> (including Agendas and Minutes)
- <https://www.csdb.org/annual-report/>
- <https://www.csdb.org/2018-2019-board-agendas/>
- <https://www.csdb.org/2018-2019-board-minutes/>
- <https://www.csdb.org/2018-2019-superintendents-report/>
- <https://www.csdb.org/school-information/csdb-policies/>
- <https://www.csdb.org/strategic-plan-2016-2019-docx/>
- <https://www.csdb.org/school-information/csdb-school-year-calendar/>
- <https://www.csdb.org/all-school-menus/>

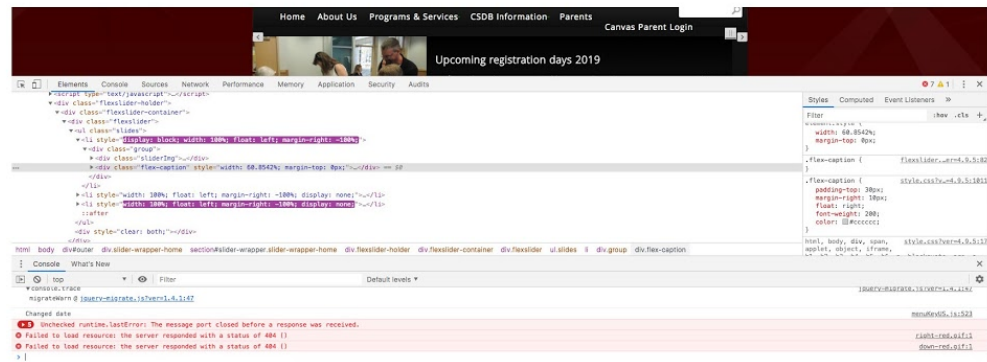
Since there are so many documents that need to be saved as PDFs,

Program Review
Colorado School for the Deaf and the Blind

August 2019

the recommendation is saving the most requested docs first, and perhaps combining some of the related subjects and/or delete some of the older ones. This is a good time to evaluate what PDFs should be on the website and what information needs to be available by other means.

12. Move more heavily visited 'CBSD School Year Calendar; and 'Menus' to the top of the 2nd level nav under 'CSDB Information,' above 'Board of Trustees.' Move 'Vision/Mission/Core Values' above 'Board of Trustees,' since the mission drives the Board of Trustees and the rest of the 2nd level nav in that section.
13. Reviewer could not easily find all of the financial information about the school. Use the words 'Financial Transparency' or 'Finances' in the navigation under 'CSDB Information' and create a new page that would include all of the financial info that is on the website on one page, including a link to the Annual Report, which should be a PDF.
14. On the home page when hovering over the rotating slideshow at the top of the page and then clicking on 'Inspect,' there are a few error messages that say 'Failed to load resource: the server responded with a status of 404 ()'. This may not be of concern, however best to have your developer look into this, and also see if there are similar errors on other pages on the website.



Navigation (nav) short-term recommendations

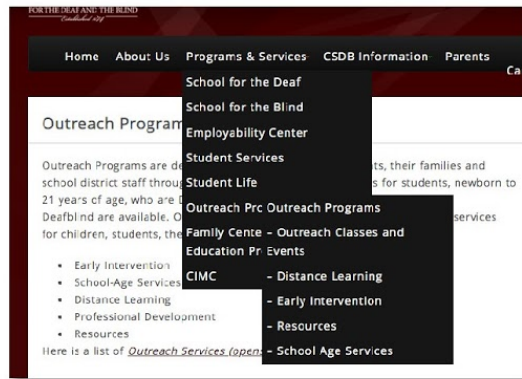
The goal is to make content appear and operate in predictable ways.

1. Footer:
 - a. Use the footer for important info that should be easy to find quickly, like your address and phone numbers, so that info appears on every page.
 - b. Leave 'Website Disclaimer' in the footer.
 - c. Put 'Athletics' as a 2nd level nav under 'Programs & Services' and remove from the footer.
 - d. Put 'Careers' as a 2nd level nav under 'CSDB Information' and remove from the footer.

Program Review
Colorado School for the Deaf and the Blind

August 2019

- e. Move 'Staff' from the footer to a second level nav under 'CSDB Information.' Change wording to 'Staff Links.'
 - f. Add something like 'Accessibility Issues?' to the footer and link to https://www.csdb.org/contact/?employeeid=webinfo&employee_name=Contact%20Us&subject=Accessibility. If someone is having accessibility issues, it would not be easy to navigate to <https://www.csdb.org/layout-examples/fullwidth-pages/page-home/about-us/> to find that contact form link.
 - g. Why is TOPS linked from the footer? That page does not appear to be of value to CSDB stakeholders since it is so generic. If it is of value, perhaps link from another page with an explanation of what it is.
2. Change 'About Us' to 'Contact Us' and put all of the pertinent info on that page, even though a lot of it will now be in the footer. Here are some good examples:
 - a. <https://jeffcormds.ss12.sharpschool.com/cms/One.aspx?portalId=1820905&pageId=1996155>
 - b. <http://east.dpsk12.org/contact-us/>
 - c. Link to teacher's pages for both schools on the 'Contact Us' page.
 - d. Make sure the page name is <https://www.csdb.org/contact-us/>
 3. Add Contact Information on the left side for all of the staff for School for the Blind like you do for School for the Deaf and remove it from the right side on <https://www.csdb.org/programs-services/school-blind-2/>
 4. Add a favicon. A favicon is a small 16×16 pixel icon that appears at the top of a web browser. It serves as branding for your website and a convenient way for visitors to locate your page when they have multiple tabs open.
 5. It is confusing to have 3rd level nav under 'Programs & Services,' 'Outreach Programs' since that is the only place where 3rd level nav is used on the website.



Suggest removing that 3rd level nav since you have those items linked on the right side on the main 'Outreach Programs' page. Link 'Outreach Programs' in the 2nd level nav directly to <https://www.csdb.org/programs-services/outreach-programs-3/>

6. On <https://www.csdb.org/programs-services/school-deaf/>, check to be sure any visually impaired visitors are able to use the drop down plus sign for

Program Review
Colorado School for the Deaf and the Blind

August 2019

“Contact Information” to get a list of staff. Suggest removing the drop down and have this information on the web page without a drop-down + choice.

Long-term recommendations

1. Usability testing: Have individuals from students, teachers, parents, community members, deaf/blind or hard-of-hearing/visually impaired communities help test your website. Have a few people from each group tasked with finding certain things on your website. This will help you quickly see what needs to be addressed. Do this on a semi-regular basis. For example, have them search for Staff, Calendar and some of the other most requested pages. Have an impartial third party oversee the usability testing, take notes on what testers find, and implement changes as needed.
2. Put School Year Calendar in a program other than a PDF. Since it is such an important part of your website, have calendar on website in a calendar program, not as a linked PDF. Here are some examples:
<http://east.dpsk12.org/calendar/>
<https://rmds.jeffcopublicschools.org/cms/one.aspx?portalId=1820905&pageId=1820925>
3. Make images larger when possible.
4. Include images of teachers, like images that are included for the Board of Trustees. Photos of teachers lends an amount of transparency and makes website visitors more comfortable.
5. Make content and design of these pages consistent:
<https://www.csdh.org/programs-services/school-deaf/>
<https://www.csdh.org/programs-services/school-blind-2/>
6. Size images to exact final size in pixels and save for the Web before uploading to website.



For example, this home page image size featured in May 2019 was actually 3264x2448 pixels (45" wide x 34" tall) and was sized down manually when added to the website to 465x349 pixels. When an image is manually sized down it does not change the size of the file. The image file size is 1,493KB (1.5MB), which is much too large for a website. Images with a large file size take longer to download to a visitor's browser and slow down your website.

Program Review
Colorado School for the Deaf and the Blind

August 2019

7. Add an up arrow on the right side in the footer or the bottom right of the page for the longer pages. Click on it to take you back to the top of the page.
8. Redesign of website, possibly using one of the WordPress accessibility themes templates. Here are some suggestions:
<https://www.hongkiat.com/blog/accessibility-ready-wordpress-themes/>
9. How does a visually impaired user that is tabbing through the website get to the pages in the second level navigation (like Programs and Services, School for the Blind? In a redesign, in addition to keeping in the nav, suggest also including 2nd level nav as text on the left or right side of all internal pages, like the [Rocky Mountain Deaf School website](#) does.
10. Have your developer use a heatmap tool to see where people are clicking, scrolling and reading on your site. This information can help you restructure the design while making sure important elements are always in the field of view.
11. Research paid website evaluation tools. Most companies offer discounts to non-profits. They are much easier to use than the free evaluation tools.

Program Review
Colorado School for the Deaf and the Blind

August 2019

Ongoing opportunities

1. Continue to add new content to the home page. It is important for SEO to have content updated on a regular basis—all elements of a home page should not be static. It should be a living, breathing snapshot of what is currently going on at the school.
2. Use a paid evaluation tool online service to regularly check for site-wide accessibility issues that you or your developer can fix. This service should also check for SEO, quality assurance, broken links, misspellings and usability.
3. Update stale and low trafficked content. Use Google Analytics to regularly check traffic for pages.
4. Hijack trending topics related to your content – promote on social media.