

Miami-Dade County Public

# School Support Team Manual

SST

2012

Innovation and Accountability

## Table of Contents

<b>School Support Team (SST)</b>	1
• Organization of the Manual	1
• SST Membership	2
<b>School Support Team Function General Descriptions</b>	2
• Child Find for ESE	2
• Rtl Tier 3 Problem Solving	3
• Consultation	3
○ Section504	3
<b>Paths to Accessing Each SST Function</b>	3
• Accessing SST for Child Find/Comprehensive Evaluations for Consideration of ESE Eligibility	3
○ Referrals from Tier 3 Problem Solving Team	4
○ Parent Request for Comprehensive Evaluation	4
○ Teacher Request for Comprehensive Evaluation	4
• Accessing Rtl Tier 3 Problem Solving/Intervention	5
○ Tier 2 Team referral of a student for Tier 3 PS/Intervention	5
○ Teacher referral of a student from Tier 2 to Tier 3	6
○ Parent request for Tier 3	6
• Accessing Consultation from SST for an Individual Student (Crisis, 504, Retention)	7
○ Getting SST Consultation for a student in Crisis	7

○ Acting on a request for a 504 plan	7
○ Student Progression Plan Required SST Retention Reviews	7
<b>SST Processes, Procedures, and Documentation for Each Function</b>	8
• SST for Child Find/Comprehensive Evaluation for ESE	8
• Evaluation of Students not Requiring Rtl as Part of Eligibility	11
Determination	17
<b>SST Rtl Tier 3 Problem Solving</b>	12
<b>SST Consultation</b>	23
• SST Retention Review	23
• Mid-Year Promotion	24
• Student in Crisis	24
• Student Post Crisis	25
• Section 504	26
<b>Considerations for English Language Learners (ELL)</b>	26

## **The School Support Team (SST)**

Previously, the School Support Team had become synonymous with the process for referring students for evaluation who were suspected of having a disability. However, with the advent of Response to Intervention (RtI) and the growing needs for individual student support, SST has evolved to perform a wider range of support functions. *Now, SST should be viewed more as a team of individuals with varied expertise that meets for several distinct purposes.*

The School Support Team is a group of school based professionals that provide various types of support to students, parents, and faculty. They meet as a Tier 3 problem solving team; to plan and deliver intensive intervention to individual students as an extension of the school's system of Response to Intervention (RtI). They meet as they always have; to ensure Child Find in the referral of students for comprehensive special education evaluations. They provide specialized support when individualized student focus is required such as when students are experiencing acute or chronic behavioral / mental health problems or immediately following a crisis event that resulted in an emergency psychiatric hospitalization (Baker Act). They review support for students who are being considered for grade retention (as prescribed by the Student Progression Plan). Finally, they review requests for Section 504 consideration (Section 504 of the Rehabilitation Act of 1983) and assist in referring a student for a Section 504 eligibility meeting, as needed.

## **Organization of this Manual**

This manual is arranged in the following progression:

- SST team composition
- Descriptions of the three major SST functions
  - Referral to Special Education
  - Tier 3 problem solving

- Consultation
- Descriptions of how to access each function
  - How each process is initiated
- Procedures and documentation for each function

### **School Support Team Membership**

In general, the School Support Team is comprised of an administrator, the school psychologist, a school counselor, school social worker, academic coaches, regular and special education teachers, a teacher or staff member with knowledge of ELL, the student's parents or guardians and, when appropriate, the student. While the composition of the core group should remain as constant as possible, specific participation in various meetings should be dictated by need.

At the beginning of each school year, the SST/PST Coordinator (Assistant Principal) completes the SST/PST Support Plan (FM# 3040) for his/her particular school. This form outlines the support plan for carrying out the various team functions, including SST/PST core members, SST/PST meeting schedule, SST/PST follow-up plan, and lists Special Education staff. This plan should be revised when necessary (e.g., change of SST/PST meeting day, change in core members). Once completed, this plan should be provided to the District SPED department, as well as to the core members of the SST.

### **School Support Team Functions**

Remembering that the SST is a team and not a singular type of meeting or process is central to understanding the varied functions in which this team engages in. Following, are brief descriptions of each specific functions of this team.

#### **Child Find for Special Education**

While students suspected of having a learning disability, language impairment, or emotional/behavior disability typically are supported by the SST Tier 3 Problem Solving Process (SST for Tier 3 Problem Solving discussed later pg. 3), some students present with other possible difficulties and suspected disabilities where RtI is not part of the eligibility determination process. For these students, the SST develops an intervention/support plan and begins the evaluation process. For students who are suspected of having a learning disability, language impairment, or

emotional/behavior disability and were referred to Child Find by the SST Tier 3 Team, the SST/Child Find process completes the evaluation, summarizes the data analysis that will be considered for eligibility and prepares the required documentation.

### **RtI Tier 3 Problem Solving**

The SST engages in developing intensive Tier 3 interventions for students who are identified as not responding adequately to core instruction, school-wide behavioral supports, and generally effective Tier 2 intervention. The four step problem solving process is used to develop, monitor and revise Tier 3 intervention.

### **Consultation**

Three specific types of consultation and support planning and review should be undertaken by the SST crisis intervention, post-crisis support, and creation of alternative courses of action to nonmandatory retention.

### **Section 504 Evaluation and Support Planning**

When the school is presented with information that warrants consideration for Section 504, the SST provides systematic consideration of the information and follows through, including a referral for a 504 eligibility meeting, as needed.

### **Paths to Accessing Each SST Function**

Means of access to particular types of SST supports vary depending upon the nature of student, parent, and teacher needs. It is important to understand how to begin the SST support process for each of the functions that the SST serves.

### **Accessing Child Find/Comprehensive Evaluation for Consideration of Special education Eligibility**

The SST is the team that processes information and plans and conducts comprehensive evaluations for students who are suspected of having disabilities subsumed under the Individuals with Disabilities Education Act. Referrals for a comprehensive evaluation can originate from three sources.

### **Referral for a Comprehensive Evaluation from the RtI Tier 3 PS Team**

The Tier 3 problem solving team (SST members) may refer a student for a comprehensive evaluation under three conditions:

1. Tier 3 problem solving and intervention, done with fidelity, has failed to promote a positive response in a student with academic and/or behavioral difficulties.
2. Tier 3 interventions have promoted a positive response for a student with academic and/or behavioral problems but the student continues to require sustained and intensive supports that may require special education.
3. A student demonstrates severe cognitive impairment, severe speech impairments, physical or sensory impairments, or presents as a danger to self or others (the use of extraordinary circumstances is specific to EBD consideration) is referred for a comprehensive evaluation, as appropriate, and RtI is **not** required for consideration for Special Education eligibility.

### **Parent Request for a Comprehensive Evaluation**

A parent of a child suspected of having a disability may request, at any time, a comprehensive evaluation to determine whether his/her child is eligible for special education. The school must provide that evaluation within the 60 day timeline. In this situation, the SST fulfills both the Tier 3 problem solving function,(when appropriate) and Child Find simultaneously.

### **Teacher Request for Assistance**

When a teacher believes that a student may have a disability, he/she may request Tier 3 assistance from the SST. The teacher completes the request for assistance form and Tier 1 and 2 student profile FM# 7452 for students referred for academic problems and submits the information to the SST chair. Regardless of tiered support, children suspected of having a disability that do not use RtI in the eligibility determination process should be referred to the SST as soon as there is suspicion of the presence of the disability. The SST will determine if Tier 3 problem solving is appropriate.

## Accessing RtI Tier 3 Problem Solving

### School Tier 2 Problem Solving Team Referral

The school's Tier 2 problem solving team meets monthly to review the effectiveness of each Tier 2 intervention. Data that is organized on the Tier 2 problem solving worksheet guides decisions related to intervention effectiveness for groups of students. When it is clear from ongoing progress monitoring (OPM) data that an individual student is not progressing, when the majority of students in the same type of intervention are progressing, the team refers that individual student to the SST for Tier 3 support. The team completes the Tier 1 and 2 student profile and requests that the student's teacher complete the request for assistance form.

Using the Tier 1 and 2 Student Data Profile the team considers the gap between the following:

1. Student's level of performance and current expected level of performance (student's score and standard)
2. Peers' (AYP subgroup) level of performance and current expected level of performance (average or median of peers scores and standard)
3. Student's level of progress and peers' (Tier 2) level of progress.

The team determines whether the gaps are *significant* or *not significant*, and warrant Tier 3 problem solving. Based on the group's analysis of assessment data (FAIR, Interim, Ongoing Progress Monitoring etc.) if the student's level of performance is significantly below the standard general standard and peer average or median, and the rate of progress is significantly less than Tier 2 peers (students receiving the same Tier 2 intervention or student's particular intervention group), the student should be referred for SST Tier 3 problem solving. For example:

- The student's level of performance on FAIR is at the 16<sup>th</sup> percentile in reading comprehension (RC) and the standard is 50.
- The student's RC percentile (16) is lower than the Tier 2 intervention group's median RC score of 25.
- The student is gaining only .75 words read correct per minute each week while the Tier 2 peers are gaining 1.5 words read correct per week.

The team determines therefore, that the gaps are significant.

Please refer to the district's Student Progression Plan, PMP through RtI/MTSS for specific considerations and required actions when individual students or



student groups (determined through PM/OPM data analysis) are below standard and not responding positively to Core Instruction or Tier 2 intervention.

Please refer to the district's RtI Guide at <http://rti.dadeschools.net> for guidance in determining student response based on all available district PM/OPM measures and Tier 1 and Tier 2 Problem Solving processes and useful tools.

## **Teacher Referral**

When a teacher believes that a student with academic and/or behavioral difficulties has not responded positively to Tier 1 and 2 supports, he/she may request Tier 3 assistance from the SST. The teacher completes the Request for Assistance Form (FM# 7073) and Tier 1 and 2 student profile and submits the information to the SST chair. Teachers should be guided by SST members in selecting appropriate students for SST based on student assessment data. The SST members (academic coaches, school psychologist) should assist teachers to ensure that a selected student is indeed not showing a positive response to Tiers 1 and 2 and that the student's difficulties are not better addressed by supporting improvement in the core (Tier 1) or the Tier 2 intervention (see Tier 1 Problem Solving worksheet and Tier 2 Problem Solving worksheet). Teacher generated requests that are not substantiated by progress monitoring data or present a clear Child Find issue (see child find section) should not be the focus of Tier 3 problem solving in SST, unless the student's parent has requested a comprehensive evaluation for special education eligibility determination.

## **Parent Request**

A parent of a child suspected of having a disability may request, at any time, a comprehensive evaluation to determine whether his/her child is eligible for special education. The school must provide that evaluation within the sixty day timeline (60 days in which the student is in attendance from date of consent to date of evaluation). In these situations, the SST fulfills both the Tier 3 problem solving function and child find simultaneously. If the Tier 1 and 2 Student Data Profile has not already been completed, it should be completed during the SST/Child Find meeting and, in addition to Tier 3 OPM, will be used when evaluating the student's response to intervention.

## **Consultation**

There are times when individual students require the focus of the SST but may not need Tier 3 support or child find. The situation warrants immediate attention but may not include a history of poor response to intervention and should not *routinely* be seen as a referral for special education. These situations require consultation and documentation of support from the SST and are outlined here.

### Student in Crisis and Post Crisis Student Support

Students who are demonstrating or reporting behaviors that are consistent with risk for self-harm or harm to others, require the immediate response and assessment by trained mental health professionals to determine if crisis stabilization is necessary through involuntary hospitalization (Baker Act).

Should it be determined that a student's behaviors are consistent with risk, resulting in a Baker Act, either at the school site or outside the school site, an SST consultation is required immediately upon the child's return to school. Therefore, the process should be initiated as soon as the school becomes aware of the hospitalization. In this case, the SST will be used to identify appropriate interventions that will be necessary to support the student's emotional well-being and success upon his/her return to school.

Due to the need for immediate action, care must be taken to avoid delaying the SST meeting while gathering certain documentation. Only those pieces of information that are immediately pertinent to the student's crisis, those needed to guide immediate support, need to be gathered before the SST meets.

### Section 504 of the Rehabilitation Act of 1973

A parent may request that the school provide a 504 accommodation plan for his/her child by presenting documentation of an impairment covered under Section 504 to the school. Each school should create a plan for receiving requests and supporting documentation that is presented to the school. The SST chairperson or a designated staff member should receive all such requests and documentation and ensure that the SST schedule will include consideration of the information.

### Grade Retention

The Student Progression Plan requires the school to conduct an SST Retention Review meeting for students being considered for possible retention. Use of the

SST here is intended to individually review tiered supports for students and is **NOT** a routine referral for Child Find and special education. It is also not a Tier 3 problem solving meeting. The school leadership team creates the list of students whose tiered supports are to be reviewed.

## **SST Process and Documentation for Each Function**

The process and required forms/documentation for each SST function are described in this section. Each section will begin with the *documentation requirement and forms needed* prior to the meeting, during the meeting, and at follow up meetings if necessary. For each section, under *process*, the sequence of activities that takes place during the SST will be described.

### **Child Find**

#### *Forms/Documentation*

##### **Prior to Meeting**

- The SST/PST Request for Assistance (FM# 7073) including results of vision and hearing screenings,
- Tier 1 and Tier 2 Student Data Profile (if the request originated with the parent and the form was not completed prior to the meeting, it must be completed as part of Tier 3 intervention),
- Notice of Intent for Screening & Assessment English [FM# 6279E (Rev.10-04)], Spanish [FM# 6279S (Rev.10-04)], Haitian Creole [FM# 6279H (Rev.10-04)]
- Permission for a School Social Worker (SSW) Student Background Screening (SSWSBS) (FM# 7075)

## During the Meeting

- SST/PST Intervention Plan [FM# 6290 (Rev.10-12)]
- SST/PST Tier 3 Student Progress Goal and Graph (FM# 7032), Behavior Intervention Plan [FM# 6287 (Rev. 12-02)] for students with behavioral concerns,
- SST/PST Monitoring System [FM# 6493 (Rev.03-07)],
- Parent/Guardian Student Support Plan English (FM# 6280), Spanish (FM# 6280S), Haitian (FM# 6280H),
- SST/PST Request for Evaluation [FM# 6572 Rev. (10-08)]

## Process

Prior to meeting, the SST/PST Request for Assistance (FM# 7073) form, results of the vision and hearing screenings, and the social history screen, are collected by the SST chair.

After the SST/PST Request for Assistance (FM# 7073) is submitted, the SST/PST coordinator/administrator will submit all forms and all required documents to the school psychologist for review. The school psychologist will review the SST/PST Request for Assistance (FM# 7073), conduct a classroom observation, determine if the request is complete (all screenings have been completed) and/or if additional data is required prior to SST Child Find meeting. The school psychologist's signature will attest that the SST/PST Request for Assistance (FM# 7073) is complete and accepted for scheduling of SST Child Find meeting.

If the school psychologist considers the data to indicate behavioral concerns are significantly impacting student performance, then consent for screening, Notice of Intent for Screening & Assessment English [FM# 6279E (Rev.10-04)], Spanish [FM# 6279S (Rev.10-04)], Haitian Creole [FM# 6279H (Rev.10-04)] is obtained and a Functional Assessment of Behavior is conducted.

For all cases, permission for a school social worker student background screening (FM# 7075) and hearing and vision screenings will be obtained.

For all cases, parental permission for an observation, to be conducted by the school psychologist and/or speech pathologist during the time of instruction and of

intervention in the area of concern is not required; however this area will be indicated on FM # 7075 as a means to ensure parental communication.

Parent/guardian permission for all screenings/observations should be secured on the Notice of Intent for Screening and Assessment (FM# 6279). This form delineates activities that are completed prior to the SST meeting and activities completed prior to a follow-up SST/PST meeting. This notice is essential as it ensures the parent/guardian is informed of the purpose of the screening(s) and the meeting.

Data Collection Activities take place prior to every SST/PST meeting. The importance of this cannot be overemphasized as this allows for a thorough examination of the student's background history, both at home and at school. The SST/PST Procedural Checklist is used to ensure that all necessary steps have been followed. If not already done so in SST Tier 3 problem solving, the form should be attached to the student's SST/PST folder to ensure that all documentation is gathered from ISIS.

- Student's subjects and grades, previous and current (F1)
- Parent information (F8)
- Student testing information (SPI)
- ESOL information (F4, pause, I or J)
- Exceptional Student Education (ESE) services (F16 and F17)
- Previous school information (F3, F21)
- Student case management (SCM) (F3, pause (clear), pause (clear), 5)
- Attendance history (F7)

Most of this data can be obtained from the Individualized Electronic Portfolio.

Permission for additional academic/diagnostic information, and/or any other information that is deemed necessary including a more in-depth diagnostic assessment to further investigate the presenting difficulties and/or emotional or behavioral rating scales may be secured, if warranted.

Permission to conduct an Assistive Technology Implementation Plan (ATIP) (FM# 7067) should be written on the Notice of Intent for Screening and Assessment form

for any student with communication problems. With the parent(s)/guardian(s) availability, an Assistive Technology Implementation Plan (FM# 7067) should be completed in collaboration with the parent(s)/guardian(s) at that time. If parent permission is not secured, the ATIP should be completed with the student's teacher.

If behavioral difficulties are indicated, Functional Assessment of Behavior (FAB) data should be checked off on the Notice of Intent for Screening and Assessment form (FM# 6279) and parent permission secured. If parent(s)/guardian(s) is/are available, a Functional Assessment Behavior Structured Interview (FM# 6660) should be completed with the parent(s)/guardian(s) at that time. Whether or not the parent grants permission, the Functional Assessment of Behavior Structured Interview should be conducted with the student's teacher.

For ELL student, a Language Proficiency/Dominance Assessment is requested, as appropriate.

### **M-Team Comprehensive Evaluation Procedures for those students not requiring the implementation of RtI procedures**

Once the SST/PST Request for Assistance (FM# 7073) is reviewed, the observation is conducted by the school psychologist. If there is evidence that the student may have a disability that does not consider RtI in the eligibility determination process, a severe cognitive impairment, a severe speech or language impairment, a sensory impairment, or the student with emotional or behavioral concerns meets the extraordinary circumstances criteria, the student is immediately referred for an M-Team Comprehensive Evaluation (SST Child Find). The SST/PST Request for Evaluation form (FM# 6572) is completed and Parental Consent for Evaluation form (FM# 4961) is obtained.

If the speech/language pathologist suspects the student of having language difficulties, the SLP may decide to do a comprehensive language evaluation. This evaluation will be conducted as part of an initial evaluation which will be part of the 60 day timeline for an initial evaluation. The SST/PST Coordinator will make sure that all required screenings/information will be available at the time of the follow-up meeting.

A request is made for a social history narrative and/or SIB-R, if needed.

The referral packet is completed and all of the required documents are submitted to the appropriate special education (SPED) center for opening within 10 days of parental consent for evaluation.

### **Intervention Development**

While RtI is not formally part of the eligibility process for the students focused on here, for all students being supported through the SST Child Find Process, an intervention plan must be written and implemented. The process for intervention development is as follows.

Set a Goal:

Baseline data should already be available. Write a goal including the timeframe, conditions, performance, and criterion. Previous data should be considered utilizing a standard to establish expected progress.

**Write an Intervention Plan:** The intervention plan should clearly identify procedures and instructional interventions to be used in the area of identified concern. Arrangements such as where and when the plan will be implemented and the materials needed to carry out the plan should be delineated. Persons responsible for all aspects of the plan are identified. It is essential that this plan is written and available to all individuals involved in the implementation of the plan.

**Select Measurement Strategy:** The measurement strategy is chosen to be used and methods of data collection, measurement conditions, and a clearly identified progress monitoring schedule (Section II) are documented. Progress monitoring or fidelity monitoring data is collected weekly.

**Plan to Evaluate Effectiveness:** A decision-making plan with documentation of intervention fidelity and frequent data collection should be identified also with strategies for summarizing the data for evaluation. The number of data points or length of time before data analysis occurs should be agreed upon and a decision rule should be selected to guide the team in determining the need for instructional changes. Implementation and monitoring of the intervention plan should continue during the evaluation process.

## **RtI Tier 3 Problem Solving (RtI)**

### ***Forms/Documentation***

### Prior to Meeting

- School Support Team/Problem Solving Team Request for Assistance (RFA) (FM# 7073)
- RtI/SST/PST Student Tier 1 and Tier 2 Data Profile (FM# 7452)

### During Meeting

- Tier 3 SST/PST Problem Solving worksheet (FM# 7450)
- SST/PST Intervention Plan [FM# 6290 (Rev.12-10)] (for academic concerns) with the accompanying SST/PST Tier 3 Student Progress Goal and Graph (FM# 7032)
- Behavior Intervention Plan [FM# 6287 (Rev. 12-02)] (for behavioral concerns)
- Parent/Guardian Student Support Plan, English (FM# 6280), Spanish (FM# 6280S) Haitian (FM# 6280H)

### At Follow Up Meeting

- The SST/PST Follow-Up form (FM# 7453)
- The RtI Fidelity Checklist (FM# 7451) is required when a student's RtI is formally reviewed, prior to determining a team based referral to SST Child Find, if a comprehensive evaluation is warranted (not required prior to a parental request for comprehensive evaluation, but will be required prior to eligibility determination).

### Available if Necessary

- Notice of Intent for Screening & Assessment; English [FM# 6279E (Rev.10-04)], Spanish [FM# 6279S (Rev.10-04)], and Haitian Creole [FM# 6279H (Rev.10-04)]
- School Social Worker Student Background Screening [FM# 7075 (Rev.10-10)]

### Process



Data Collection Activities take place prior to every SST/PST meeting. The importance of this cannot be overemphasized as this allows for a thorough examination of the student's background history, both at home and at school. The following information should be gathered for review:

- Student's subjects and grades, previous and current (F1)
- Parent information (F8)
- Student testing information (SPI)
- ESOL information (F4, pause, I or J)
- Exceptional Student Education (ESE) services (F16 and F17)
- Previous school information (F3, F21)
- Student case management (SCM) (F3, pause (clear), pause (clear), 5)
- Attendance history (F7)

### **Using the 4 Step Problem Solving Process**

During the SST Tier 3 problem solving meeting, the Tier 3 Problem Solving Worksheet (FM# 7450), and the SST Tier 3 intervention plan (FM# 6290 Rev.12-10) are completed using the steps outlined here.

#### **Step1. Problem Identification: Defining the Problem.**

Review the Request for Assistance, gathered information, and Tier 1 and 2 Student Data Profile to:

Derive a general description of the concern or the current difficulty the student is having. ALL concerns are noted at this time, but if there are concerns in multiple areas, these concerns must be prioritized and a target area selected.

**Identify the Area(s) of Concern:** Define the area(s) of concern in concrete, observable terms. This definition must be clear and recognizable by observers and must include examples of the concern(s).

Good example of area of concern: *"The student's oral reading fluency rate is 30 wpm, half of what is expected for her grade level placement."*

Poor example of target skill identification: “*The student does not read very fast.*”

The **target skill** must be written in measurable, observable, and/or reportable terms. (*What do want the student to do?*)

Good example of target skill identification: “*The student will read target grade-level passages (ORF grade 3 passage) with 95% accuracy and a rate of at least 88 words read correct per minute after 8 weeks of intervention,*” Poor example of target skill identification: “*The student will read better,*” or “*The student will demonstrate better social skills.*”

**Data Collection for GAP Analysis:** Data on the student’s current level of performance, current expected level of performance, and current level of performance for peer group is provided that directly assessed the identified target skill.

Calculate the difference between where the student’s academic and/or behavioral functioning should be and where it actually is. This requires the use of a grade or age level standard for the data being used to measure the student’s performance. This serves as the foundation for determining a performance discrepancy, clarifies the magnitude of the concern, and helps establish the student’s aim line (progress goal which will be established later on the SST/PST Intervention Plan).

Goal setting involves the use of gap analysis and charting/graphing the student’s performance across the duration of intervention against the necessary progress needed to demonstrate a narrowing of the gap. (See OPM guidelines and recommended positive response rates in the district’s RtI Guide at <http://rti.dadeschools.net> .

Using the Tier 1 and 2 Student Data Profile or available assessment data, ensure that the student’s current performance is significantly below standard and peers, and Tier 2 progress is below Tier 2 peers (as described previously).

Determine whether gap is *significant* or *not significant*: To ensure that the student’s difficulties should be addresses through Tier 3 problem solving, the magnitude of the student’s difficulties and the uniquely poor student response to core and Tier 2 should be examined. Where this process has already occurred through Tier 2 problem solving, it does not need to be redone. Where the comparisons have not been completed (as possibly occurring with a parent or teacher request, the examination must occur.

**Step2. Problem Analysis:** Determine why the problem is occurring or; why is there a gap between what the student is doing and what he/she should be doing. Hypotheses are formulated to find out what we need to know to design an intervention plan.

**Hypotheses are developed:** The team should look to provide information as to “why” there is a difference between what is expected and what is observed. This includes looking at the domains of *instruction, curriculum, environment*, and the *learner (ICEL)*. Hypotheses are generated in an attempt to establish an assumed cause for the area of concern and answer the question, “Why is the student performing at a level of concern?” **Predictions** about what will increase the student’s performance in the area(s) of concern are made.

The following provides a *guide* (should not be limiting) to assist with hypothesis generation by looking at ICEL domains:

Instruction: How we teach what is being taught.

Is explicit instruction provided? (I do, we do, and you do)

Are abstract concepts taught using concrete to visual to symbolic sequencing? (Manipulatives to pictures to numbers)

Is sufficient time devoted to the student’s diagnostic need? (Ample fluency practice for disfluent readers)

Curriculum: What is being taught and what materials are being used

Does small group core instruction and Tier 2 intervention have sufficient and accurate coverage of the student’s diagnostically based needs?

Environment: Context where instruction is occurring

Learner: Characteristics intrinsic to the individual in relation to the concern such as motivation

The following is an example of a *hypothesis and prediction statement*:

Hypothesis: Mary is noncompliant because she does not have the skills to complete the work successfully.

Prediction: If we reduce the academic demand (and systematically increase demand as progress warrants) while improving Mary’s reading efficiency,

Mary will become more compliant.

**Hypotheses are validated using assessment procedures:** The generated hypotheses are then “assessed” or validated using **Review, Interview, Observation, and Test (RIOT)** procedures, and should ultimately link to instruction for the purpose of designing an educational intervention. Assessment procedures are used for validation until an intervention is indicated. The SST/PST is asking the question “Is the hypothesis alterable?” In other words, can that variable in question be changed in any way? If yes, than the committee should consider making any changes to increase student performance. If not, then the problem solving process continues. **The assessment/validation using RIOT procedures must focus on gathering information that will directly impact student gains in his/her classroom environment and is alterable (something we can do something about).** The following provides **examples** of ICEL assessment domains and RIOT assessment procedures for validation consideration:

- **Instruction: (Review)** Permanent products, tests, worksheets etc.  
**(Interview)** Teachers and students  
**(Observe)** Actual teaching practices  
**(Test)** Classroom environment checklists, student
- **Curriculum:(Review)** Permanent products books, curriculum guides, scope and sequence  
**(Interview)** Teacher and relevant personnel  
**(Observe)** Classroom work, alignment of assignments and materials with goals and objectives  
**(Test)** Level of assignment and curriculum material difficulty, student’s opinion about what is being taught
- **Environment: (Review)** School rules and policies, schedules  
**(Interview)** Ask relevant personnel  
**(Observe)** Student, peers, instruction, and classroom distractions  
**(Test)** Environment variables with checklists, rating scales
- **Learner: (Review)** District records, health records, educational history  
**(Interview)** Relevant personnel parents, teachers, etc.  
**(Observe)** Target behaviors  
**(Test)** Student performance, assess variables related to

instruction, curriculum and environment

Given the hypothesis/prediction statement about Mary (Step 2. a.), the team considered ICEL by way of RIOT procedures. For example, the team may have *reviewed learner* records for evidence of skills; *reviewed curriculum* to understand expectation.

- “A review of records and curriculum indicates that Mary does not have the discrete phonics and fluency skills to complete the requested grade level comprehension tasks. “
- Hypothesis is validated.

### **Step 3. Intervention Development and Implementation**

Complete the SST/PST Intervention Plan (FM# 6290) at this point.

Once the hypotheses are validated and the decision is made that they are alterable, the next step is to develop interventions, ensure that the necessary supports for interventions (training, material, scheduling) is in place, and document a monitoring schedule to subsequently review student’s response to intervention.

**Generate Possible Solutions:** This step requires the team to use the information gathered from the analysis of the area targeted for instruction/intervention. Based on the hypothesis and validated prediction, the team should have specific guidance as to what intervention has the highest likelihood of success.

**Evaluate the Solutions:** Potential solutions should consider alterable variables, feasibility, teacher skills, and the likelihood of success. Resources to conduct the intervention must be considered and a solution must be selected that is reasonable within the general education environment.

**Select a Solution:** When selecting reasonable solutions, it is important to take into account the feasibility that the teacher can or will implement the plan with fidelity. Plans that cannot be implemented the way they were designed will not generate much, if any, usable information for decision making at a later time.

**Set a Goal and Determine Criteria for Success (Positive Outcome):** Baseline data should already be available. If the data however is not considered to be a reflection of current functioning (due to the recency of the data or professional judgment), a baseline should be completed at the beginning of intervention using

the assessment tool that will be used for ongoing progress monitoring (see progress monitoring guide). Create a graphic aim line and write a goal including the time frame, conditions, performance, and criterion. Where established norms for average growth are unavailable, previous data should be considered utilizing a standard to establish expected progress (i.e., peer performance, teacher expectations, and realistic/ambitious growth rates). See the district's RtI Guide for goal setting and graphing assistance at <http://rti.dadeschools.net>. The SST/PST Tier 3 Student Progress Goal and Graph form (FM# 7032) is used to document the student's goal (aim line) and criteria for demonstrating a positive response (OPM data and trend line are recorder later during intervention implementation).

**Write the Intervention Plan:** The intervention plan should clearly identify procedures and instructional interventions to be used in the area of identified concern. Arrangements such as where and when the plan will be implemented and the materials needed to carry out the plan should be delineated. Persons responsible for all aspects of the plan are identified. It is essential that this plan is written and available to all individuals involved in the implementation of the plan.

**Select a Method of Ongoing Progress Monitoring:** At Tier 3, student progress and/or intervention fidelity monitoring should occur weekly. Depending on the skill or behavior being monitored and the reliability of the OPM measure, the frequency of ongoing progress monitoring (OPM) of both the target skill (such as phoneme blending) and general outcome measurement (such as oral reading fluency) will vary (with FAIR ORF probes, reading progress is measured every 20 instructional days and fidelity once per week). Frequency of skill and general outcome monitoring is based on the chosen progress monitoring tools' ability to show valid change and guide decision making in a time frame that matches the urgency of the intervention (see progress monitoring guide <http://rti.dadeschools.net>). While actual skill monitoring may occur less than weekly (such as when using FAIR ORF probes to measure oral reading fluency), other aspects of the intervention can and must be monitored at least weekly. This can be done through observation, discussion with the interventionist/teacher, reviews of permanent products of intervention, or even speaking to the student. This type of monitoring ensures fidelity and addresses issues of frequency, accuracy of focus, interventionist preparation, and student engagement. While progress monitoring data must be compiled in graphic form, the SST/PST Monitoring System [FM# 6493 (Rev.03-07)] and the SST Tier 3 Student Progress Goal and Graph (FM# 7032) provide convenient formats for recording weekly

monitoring information through recording of both OPM scores and comments.

**Plan to Evaluate Effectiveness:** A decision-making plan with documentation of intervention fidelity and frequent data collection should be identified also with strategies for summarizing the data for evaluation. The number of data points or length of time before data analysis occurs should be agreed upon and a decision rule for what constitutes a positive response must be selected to guide the team in determining the need for instructional changes. A follow-up meeting date must be determined.

The Parent Support Plan is completed and clarified with the parent. This form identifies specific areas of need that are addressed in the SST/PST Intervention Plan, activities that will be implemented at school to address the areas of need, and activities that can be completed at home to address the areas of need. This form is available in three languages English, Spanish, and Haitian-Creole.

**Implement the Plan:** The intervention plan must be implemented as designed with modifications based on data analysis and in collaboration with other implementers. Implementation of the plan will require ongoing support, technical assistance, trouble shooting, positive reinforcement for the implementers, and data collection and/or analysis. All implemented plans must be progress monitored.

**Monitoring and Documenting Student Progress:** Student progress must be monitored. Access to the student's intervention plan and monitoring data should be made easily available to the classroom teacher, interventionist, school psychologist, parent and/or any member of the SST/PST.

The SST/PST designates a member to conduct the ongoing progress monitoring, based on the monitoring plan.

Progress is tracked based on the method of intervention and with comparisons to intervention goal(s).

The school psychologist will be responsible for coordinating ongoing progress monitoring.

Any intervention(s) that is implemented must have the student's attendance and progress documented. This is documented on the SST/PST Monitoring System form along with the Tier 3 Student Progress Goal and Graph (FM#7032). It is important to track the student's **rate** of learning (increase in student achievement from the beginning of the targeted intervention until the end of the monitoring period) as it will be used to guide intervention decisions based on the student's response.

The SST/PST Coordinator should compile the following information in the student's RtI folder in a section for SST/PST.

- RtI/SST/PST Student Tier 1 and Tier 2 Data Profile (FM#7452)
- SST/PST Request for Assistance (FM# 7073)
- Tier 3 SST/PST Problem Solving form (FM#7450)
- SST/PST Intervention Plan (FM# 6290) and when appropriate the BIP
- SST Tier 3 Student Progress Goal and Graph (FM#
- Selected monitoring probes (if applicable) used to track student progress
- SST/PST Monitoring System (FM# 6493)
- Response to Intervention (RtI) Fidelity Checklist (FM# 7451)
- Copy of the Parent/Guardian Student Support Plan (FM# 6280)

As interventions are ongoing, teachers should accumulate all intervention related work samples and record any progress notes in the SST/PST folder.

#### ***Step 4. Evaluate Progress: SST/PST Follow-Up Meeting***

To determine the intervention's effectiveness, determine if intervention revision is necessary, or to move student support to providing a comprehensive evaluation for eligibility determination, evaluation of the student's response to Tier 3 intervention must occur. Both the student's absolute level of performance and the student's rate of progress are evaluated. The SST/PST Follow-up meeting, (FM#7453) form is now utilized. The data from Tier 3 intervention progress monitoring and the M-DCPS Response to Intervention (RtI) Fidelity Checklist (FM# 7451) must be available for review in order to determine the student's response to Tier 3 interventions.

Student response is characterized in RtI by one of three descriptors, *Positive*, *Questionable*, or *Poor*.

##### ***Positive Response***

The student's rate of progress is closing the gap between their baseline and performance in the average range; they are beginning to catch up. A positive response represents progress greater than average or simply put a rate that exceeds one year of growth in one year of time.

##### ***Questionable Response***



The student's rate of progress is better than what they have shown prior to intervention but is not greater than one year's growth in one year's time. Simply put, while they are doing better, they are not going to catch up at that rate of progress.

**Poor Response**

The student's rate of progress is the same or worse than what they demonstrated prior to intervention. The student continues to fall farther behind.

Possible outcomes when evaluating an intervention include:

- **Response: Positive** Response with *achievement in the average range*  
The discrepancy between expected and observed behavior of the student no longer exists. The student is meeting age and grade level standards. The student should be expected to benefit from Tier 1 instruction in general education without significant modifications or adaptations.  
**SST Action:** Discontinue Tier 3 supports, monitor through RtI
- **Response: Positive** but *achievement is below average*  
The student is making progress toward the goal, no longer needs Tier 3 support, but continues to need Tier 2 intervention.  
**SST Action:** Discontinue Tier 3 supports, monitor through Tier 2
- **Response: Positive** but *achievement is below average*  
The student is responding to Tier 3 intervention and demonstrates acceptable rate of progress but *continues to require sustained and substantial effort at Tier 3 to close the achievement gap*. The resources needed to maintain the intervention are beyond what can be reasonably continued in general education.  
**SST Action:** Continue with Tier 3 intervention and request an M-Team Comprehensive Evaluation. (Refer for Child Find SST)
- **Response: Questionable** with *below average achievement*  
**SST Action:** The plan needs to be revised or modified in order to obtain the expected rate of progress. The purpose of ongoing, frequent progress monitoring is to provide the necessary data for making instructional changes when they are warranted. A successful intervention may have multiple phases as changes (based on data) are made. It may also be determined that a request for a comprehensive evaluation should be requested for this student.
- **Response: Poor** with *below average achievement*  
**SST Action:** Revisit Tier 3 with problem solving with possible intervention revisions. The SST may request an M-Team Comprehensive Evaluation (Refer to Child Find SST).

## **Consultation**

### **SST Retention Review**

#### ***Forms/Documentation***

- Tier 2 Problem Solving Worksheet and recording SST intervention development in ISIS is used to document SST retention review

#### **Process**

During Tier 2 problem solving, students who are being considered for retention should have their RtI support reviewed in the following manner, and that review documented as SST intervention development. This is not to be considered as a referral to either Tier 3 or SST/Child Find unless the student's response to intervention warrants that (see selecting students for Tier 3 support)

- Is the student's Tier 2 response questionable or poor? If so: Does there appear to be sufficient identification of the student's remedial needs based on the reported assessment?
- Are the documented interventions consistent with the identified area of academic need, e. g., phonemic awareness, fluency, numbers sense?
- Are the interventions occurring as planned and are they occurring in sufficient frequency and duration?
- Do the academic interventions that are part of the PMP provide access to available tutorials, alternative education, extended school day, Saturday school, and/or any other pull out programs in the school?
- Are there any additional sources of support available and has the student's parent been involved in the remediation to a reasonable extent if possible?

After reviewing the student's RtI Tier 2 response, any of the following recommendations may be the outcome of the SST retention meeting:

- Decide if the academic interventions are sufficient to meet the individual remedial needs of the student (indicated when the overall intervention group shows progress but the individual student does not).

- If the majority of students in the intervention are not demonstrating a positive response, provide assistance to the teacher in either continuing or modifying the academic interventions with suggestions for enhancement (target area specialists or administration should assist the teacher or interventionist).
- If appropriate (see pg. 5), refer the student for Tier 3 problem solving.

## **Mid-Year Promotion**

### ***Forms/Documentation***

- Documented by coding an SST Intervention Development in ISIS.

No additional (other than SPP requirements for mid-year promotion) SST forms or SST documentation is required.

### ***Process***

Any student in grades K- 8, with the exception of grade 3, who has been retained, may be assigned at any time during the next school year to the next higher grade. Upon teacher recommendation and principal approval, retained elementary school student's progress is to be reviewed by the RtI Problem Solving Team by the end of the first nine weeks. If the student demonstrates progress during this time, the RtI Problem Solving Team may recommend the student's promotion to the principal who will make the final determination.

## **Crisis**

### ***Forms/Documentation***

#### **Prior to the Meeting**

- When a student is believed to be in crisis emotionally or behaviorally and poses a possible risk of danger to himself/herself or others, a risk assessment must be conducted and entered into the Student Case Management System (SCM) by an appropriate mental health professional.
- Should the student require Baker Acting, the risk intervention (RI) code must be entered into the SCM.

#### **During the Meeting**

- The behavior intervention plan (BIP – Form# 6287) is completed during the SST Consultation Meeting. The SST Consultation meeting is documented by entering SST intervention development.

### ***Process***

Should it be determined that a student's behaviors are consistent with risk, but do NOT rise to the level that require immediate hospitalization, an SST should be scheduled in an effort to provide school site support and interventions that address these self-defeating behaviors. A BIP (Form# 6287) should be created that establishes carefully defined strategies to address the identified behaviors of concern.

This process applies to all students, regardless of whether or not they have already been identified as a student qualifying for any special education programs, including gifted.

A member of the SST is designated as the progress monitor. This person keeps track of the implementation of the student's plan and reports regularly to the SST members.

### **Post Crisis**

#### ***Forms/Documentation***

##### Prior to the Meeting

- It may be appropriate to request from the parents of the student any pertinent hospital or physician records that might aid in support planning.

##### During the Meeting

- A BIP (Form 6287) is completed during the SST consultation meeting. The SST consultation meeting is documented by entering SST intervention development and post crisis intervention (RP) in the SCM system.

### ***Process***

As a result of a student being Baker Acted, the SST meets to evaluate the level of support needed to assist the student. A BIP (Form 6287) should be created that establishes carefully defined strategies to address the identified behaviors of concern.

In addition to Tier 3 support, the SST may determine that the student's situation meets the extreme circumstances criteria, In that case, the SST focus shifts to Child Find and proceeds as such. The appropriate referral documentation for and follow up to those specific processes is required (see SST Tier 3 Problem Solving pg. 13 and/or SST Child Find pg. 8).

This process applies to all students, regardless of whether or not they have already been identified as a student qualifying for any special education programs, including gifted.

## **Section 504**

### ***Forms/Documentation***

- The Section 504 process is documented in the SPED EMS system.

### ***Process***

Under Section 504 of the Rehabilitation Act of 1973, when a school considers Section 504 eligibility for students with learning or emotional impairments, the SST will review the appropriate data and follow the district's 504 procedures.

## **Considerations for English Language Learners**

The term English Language Learner (ELL) refers to a student who is in the process of acquiring English as a second language within an academic setting, while also expected to master content area instruction typically delivered in English. ELL represents a largely *heterogeneous group* with a unique set of skills and background experiences. ELL students may enter school at *different stages in their second language development*. Moreover, they may not pass through all stages of language development at the same rate or even in the same sequence. In addition, a myriad of factors, such as personality, motivation, general ability, aptitude, and/or specific processes, influence the rate of second language learning. As such, it is important to understand that ELLs will require differentiated support

as they begin the process of merging into a new educational system. A one-size fits all approach cannot meet their instructional or intervention needs.

The State Board of Education versus League of United Latin American Citizens (LULAC) et al., Consent Decree ***requires that all schools have a functional Limited English Proficiency (ELL) Committee.*** The ELL Committee consists of an administrator or designee, ESOL teacher(s), home language arts teacher (if any), classroom/subject area teachers, and school guidance counselor. The parent(s)/guardian(s) are to be invited to attend any meeting of the ELL Committee. In addition, support personnel (e.g., bilingual assessor, school psychologist, functional assessment of behavior (FAB) specialist, reading coach/leader, school guidance counselor, speech pathologist, and/or school social worker) may be invited or asked to provide input related to the student.

With the advent of RtI and Tiered Problem Solving, the work of the ELL committee must complement and work together with the teams that problem solve at each Tier. The effectiveness of ESOL, home language arts, and interventions for ELLs must be examined in the same manner, with many of the same team members as the overall system of RtI (with the inclusion of those members who bring specific expertise in ELL issues, ELL instruction, and ELL assessment).

In order for a student to become proficient in a second language, the attainment of basic interpersonal communication skills (BICS) and cognitive academic language proficiency (CALP) are necessary. BICS refers to those social language skills which are typically acquired quickly by ELL students with language backgrounds similar to English (Cummins, 2010). Conversely, CALP refers to the language required for formal, academic learning (Haynes, 2007). According to Cummins, children who begin to acquire a second language at the time they enter school take one to two years to acquire BICS and five to seven years to acquire CALP. Erroneously, many teachers and administrators assume that because an ELL has acquired conversational language (BICS), he/she should also be able to perform high-order thinking tasks such as those requiring classification, synthesis, and evaluation in English (CALP) (Haynes, 2007). As educators, it is important to understand that although an ELL may show adequately developed BICS, he/she continues to acquire CALP and may not have the literacy skills required to perform grade-level higher-order tasks. Additionally, a “common underlying proficiency” (CUP) exists for both the first language and the second language, facilitating the transfer of concepts acquired through one language to the other language. As

such, children who enter school with a solid foundation in their first language will most likely develop stronger literacy skills in the second language. In some cases, during the process of second language acquisition, “subtractive bilingualism” may occur when the second language is introduced without continuing to develop the first language. Therefore, the ELL’s proficiency in the first language may regress, while still lacking proficiency in the second language, resulting in limited proficiency in both the first and second language.

### Proficiency Levels

The instrument used to determine the level of each ELL’s proficiency in English is the Comprehensive English Language Learning Assessment (CELLA). The CELLA contains four sections – listening, reading, writing and speaking. Students are administered all four sections of the test. The CELLA is divided into four levels: Level A (grades K-2); Level B (grades 3-5); Level C (grades 6-8); and Level D (grades 9-12).

In M-DCPS, CELLA scores have been aligned to the English for Speakers of Other Languages (ESOL) levels, which range from level 1 to level 5. Upon enrollment into the M-DCPS, students whose home language is other than English and were not administered the CELLA are administered the CELLA online. Students who on the CELLA online are identified to be at an ESOL Level 1 to 4 are provided ESOL and ESOL related instruction. In addition, an English Language Learner Plan (WLEP) is developed for the student. The plan delineates information as to the student’s entry into the ESOL program, ESOL level, ESOL instructional program, and documents all subsequent updates and modifications to the particular student’s ESOL program. Additionally, the date of the meeting, members present at the ELL meeting, and recommendations relevant to the ELL are noted on the plan.

Every ELL student who continues to have difficulties acquiring either language or academic/ behavioral skills, outside of the normal learning trajectory for what is expected for a student who is acquiring a second language, is provided RtI tiered supports. The ELL committee must participate in the school’s tiered problem solving in order to ensure that effective instruction and intervention, tailored to meet the needs of a diverse group of ELLs, takes place. Instructional and programmatic recommendations and interventions must be developed at each Tier

and implemented with fidelity prior to requesting assistance from the SST/PST Tier 3 Problem Solving Team. The Tier 1 and Tier 2 problem solving teams for ELLs must include the ELL committee members and must perform the ELL team functions using the RtI 4 Step Problem Solving Process. If a student's response to generally effective Tier 1 and Tier 2 supports for academic and/or behavioral difficulties is not positive, then SST Tier 3 support may be requested, and all information gathered by the ELL committee can be utilized at the SST/PST. In the vast majority of cases, the ELL Committee cannot provide initial support to a student in conjunction with an SST/PST; it must have occurred throughout tiered support and prior to a request for assistance of the SST/PST. In situations, however, where the student appears to have an immediate need for a comprehensive evaluation, severe cognitive impairment, severe speech and/or language impairment, or the onset of acute mental illness, the ELL committee should support the student while the SST/comprehensive evaluation process takes place.

#### The ELL Committee

The ELL committee is a school-based functional committee that, in addition to determining program entry and exit, addresses the group and individual instructional needs of the ELL student at every Tier. A graphic depiction of the RtI Tiers, as they apply to the ELL student, follows on the next two pages.

#### **ELL Core, Tier 1**

Instructional Plan	Progress Monitoring	RtI Problem Solving
--------------------	---------------------	---------------------



<p>For ELL students &lt; 2 years in ESOL:</p> <ul style="list-style-type: none"> <li>• With typically developing L1 -150 minutes weekly of Home Language Arts instruction</li> <li>• With under developing L1- 150 minutes per week of additional Core w/ emphasis on English language development</li> <li>• • All receive Core curriculum during 90 minute block</li> </ul>	<ul style="list-style-type: none"> <li>• ELL assessed with appropriate state assessments not included in PMP, but included in WLEP Plan</li> <li>• Data collected by home language arts, language arts teacher and FAIR is used to diagnose and progress monitor</li> </ul>	<ul style="list-style-type: none"> <li>• Occurs three times per year with representation from ELL Committee</li> <li>• Sets goals, monitors core for effectiveness, and supports/revises instruction when needed</li> <li>• *Selects students who are at risk or not progressing to receive Tier 2 intervention</li> <li>• Completes Tier 1 Problem Solving Worksheet</li> </ul>
---	---	--

**ELL Tier 2**

<p>*For ELL students receiving core who are deemed at risk compared to ELL peers</p> <ul style="list-style-type: none"> <li>• Core curriculum during 90 minute block</li> <li>• Additional 30 minutes of intervention during the school day</li> </ul>	<ul style="list-style-type: none"> <li>• In addition to core benchmarking, teacher judgment, grades, and appropriate OPM measures are gathered and organized for frequent problem solving.</li> <li>• L1 OPM measures are recommended for students with typically developing L1 in addition to OPM measures in L2.</li> </ul>	<ul style="list-style-type: none"> <li>• All progress monitoring data CELLA scores (if available), teacher judgment, and OPM are reviewed by Tier 2/ELL Committee (recommended monthly).</li> <li>• Group support is planned if Tier 2 does not produce positive response for 70% of students (completes Tier 2 Problem Solving Worksheet).</li> <li>• Tier 2 SST/PST/ELL Committee requests Tier 3 assistance for appropriate individual students (completes Tier 1 and Two Data Profile). A Language Proficiency/Dominance Screening must be requested for ELL at ESOL Levels, 3, 4 and 5 exited within two years.</li> </ul>
<p>For ELL students with &gt;2 years of consecutive participation in ESOL program with appropriate Tiered intervention and not making adequate progress (CELLA can be used for both groups w/ FAIR):</p> <ul style="list-style-type: none"> <li>• 150 minutes weekly of Home Language Arts instruction</li> <li>• Core curriculum during 90 minute block</li> </ul>	<ul style="list-style-type: none"> <li>• Data needed to develop and validate hypotheses explaining the student’s lack of progress should be gathered.</li> </ul>	<ul style="list-style-type: none"> <li>• Tier 2 SST/PST/ELL Committee reviews each student’s data and Tiered support and, requests Tier 3 assistance for individual students when appropriate.</li> <li>• Language Prof./Dominance Screening must be requested for ELL at ESOL Levels, 3, 4 and 5 exited within two years.</li> </ul>

Notes

---

---

---

---

---

---

---

---