

**BUILDING A UNIFIED SYSTEM OF
SERVICE DELIVERY THAT IMPROVES
OUTCOMES FOR STUDENTS WITH
AND WITHOUT DISABILITIES**

by the Council of the Great City Schools



----- 2023

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ACKNOWLEDGEMENTS

The Council of the Great City Schools (Council) thanks the many individuals who contributed to our task of gathering and reviewing quantitative and qualitative information designed to inform our recommendations for improving the San Antonio Independent School District's (SAISD) provision of special education. Their contributions were critical to our mission.

First, we thank Superintendent Jaime Aquino as it is not easy to ask one's colleagues for the kind of reviews conducted by the Council's teams. Typically, our reports are very tough. It takes courage and openness to request them and a real desire for change and improvement. Dr. Aquino has these in abundance.

Second, we thank the SAISD Board of Trustees, which approved and supported this review. We hope this report meets your expectations and will help improve special education instruction and services, and support personnel who contributed to this effort. In particular, the assistance of Patti Salzmann, deputy superintendent/chief academic officer and Gracie Cabello, her senior administrative assistant; Kristen Williams, disability services executive director, and 11 disability services administrators. They arranged the interviews and provided the detailed data and documents requested by the team. The time and effort required to organize a review such as this are extraordinary, and their work and support of all the staff was much appreciated.

Fourth, the Council thanks the many individuals who met with us, including central office administrators and personnel, principals, general and special educators, instructional assistants, related-services personnel, and parents/families. They work passionately to support children with disabilities and ensure the school district serves these students in the best possible manner.

Fifth, the Council thanks Dr. Christina Foti, special education chief for the New York City Department of Education, Jessica Baldwin, interim deputy chief of student services for Cleveland Metropolitan School District, and Corey Golomb, assistant superintendent, specialized academic support services for the Fort Worth Independent School District. Their contributions to this review were enormous. The enthusiasm and generosity of these individuals and districts that have supported this review serve as further examples of how the nation's urban public-school systems are banding together to help each other improve performance for all students.

Finally, I thank Sue Gamm, a nationally recognized expert in special education and a long-time consultant to the Council, who worked diligently to prepare the final report, along with Alka Pateriya, CGCS's strategy and partnerships director, and Delisa Nunez, CGCS's partnership specialist. Their work was outstanding, as always, and critical to the success of this effort.

Thank you.

Dr. Ray Hart
CGCS's executive director

CHAPTER 1. PURPOSE AND ORIGIN OF THE PROJECT

Superintendent Jaime Aquino asked the Council of the Great City Schools (CGCS or Council) to review the SAISD’s instruction, services, and support for students with disabilities and interview stakeholders to ultimately provide a set of recommendations for improving special education. Since the initiation of the Council’s review, SAISD’s leadership has shared their strong desire to improve outcomes for students with disabilities and all students generally. This report was written, and recommendations are provided, to achieve this goal and maximize the district’s capacity to educate all students effectively.

WORK OF THE STRATEGIC SUPPORT TEAM

To conduct its work, the Council assembled a team of experts who have successfully administered and operated instruction and support for students with disabilities, including English learners with disabilities, in other major urban school districts around the country. These individuals also have firsthand expertise with the Individuals with Disabilities Education Act (IDEA) and are well versed in best practices in the administration and operation of special education programming.

The Council’s Strategic Support Team (SST) visited the district March 6 - March 8, 2023. During this period, the Council SST conducted interviews and focus groups with district personnel, and the Special Education Parent Advisory Council (SEPAC) and other parents. Also, several parents provided feedback in writing. (See appendices for a list of those interviewed.) In addition, the team reviewed numerous documents and reports, analyzed data, and developed initial recommendations and proposals before finalizing this report. (See appendices for a list of documents reviewed.)

On the final afternoon of its site visit, the team briefed the deputy superintendent/chief academic officer, assistant superintendent for SEAD and restorative practices, and the executive director for disability services. Also, the team briefed the disability services leadership team. The Council SST shared their observations and preliminary recommendations.

Our approach of providing technical assistance to urban school districts by using senior managers from other urban school systems is unique to the CGCS and its members. The organization finds it to be an effective approach for several reasons.

First, it allows the superintendent and staff members to work with a diverse set of talented, successful practitioners from around the country. The teams provide a pool of expertise that superintendents and staff can call on for advice as they implement the recommendations, face new challenges, and develop alternative solutions.

Second, the recommendations from urban school peers have power because the individuals who develop them have faced many of the same challenges encountered by the district requesting

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the review. No one can say that these individuals do not know what working in an urban school system is like or that their proposals have not been tested under the most rigorous conditions.

Third, using senior urban school managers from other urban school communities is less expensive than retaining large management consulting firms that may have little to no programmatic experience. The learning curve is rapid, and it would be difficult for any school system to buy on the open market the level of expertise offered by the Council's teams.

Members of the Strategic Support Team for this project included those named below.

Dr. Ray Hart Executive Director Council of the Great City Schools	Jessica Baldwin Interim Deputy Chief of Student Services Cleveland Metropolitan School District
Dr. Christina Foti Chief of Special Education New York City Department of Education	Sue Gamm, Esq. Former Chief Specialized Services Officer Chicago Public Schools
Corey Golomb Assistant Superintendent, Specialized Academic Support Services Fort Worth Independent School District	

CHAPTER 2. SAISD BACKGROUND AND REPORT OVERVIEW

The City Council established the San Antonio public schools in 1854, and 45 years later the school system became an independent district with a Board of Trustees. A state of Texas charter followed in 1903. Most of SAISD is within San Antonio, but it also serves parts of Olmos Park and Balcones Heights, and a small unincorporated area of east Bexar County.¹ As one of 12 independent school districts in San Antonio, which is a decrease from the 64 in 1937.² SAISD is the city's 3rd largest and the state's 13th largest school district.

In January 2016, then Superintendent Pedro Martinez, led a five-year plan designed to improved student achievement. Three school years later, the Texas Education Agency (TEA) awarded SAISD an overall 2018-19 accountability rating of 'B.'" For 2020-21, the first year after schools were closed due to the pandemic, SAISD continued to hold this rating and improved indicator outcomes in several areas. First, 63% of SAISD campuses (63 schools) were rated an A or B-, an increase from 27 percent (27 schools). Second, 10 percent of schools (10 campuses) will be Not Rated for earning less than a C-, a decrease from 39 percent (39 campuses). Third, 20 campuses significantly improved their ratings: one increased from F to A, eight increased from Fs to Bs, and 11 increased to Ds from Bs.³ With this performance, SAISD decreased by about 90 percent the number of students attending low-performing schools. According to SAISD representatives, in 2022-23 some 6,000 students attended schools needing improvement, a marked decrease from the 30,000 students in 2015-16.

SAISD educates some 45,152 students in 97 schools. With an enrollment rate of 90 percent nearly all SAISD students are Hispanic/Latino (Hispanic). Of the remaining 10 percent, Black or African American (Black) students comprise 5.6 percent, white students comprise 2.9 percent, and the remaining 1.4 percent include small numbers of students who are Asian, American Indian/Alaska Native, and Native Hawaiian/Other Pacific Islander. Emergent Bilingual (EB) students account for 24 percent of SAISD's total enrollment. Furthermore, 87 percent of district students have a status of economic disadvantage, compared to 57 percent of Texas' publicly enrolled students.⁴ Of all

¹ Retrieved from <https://www.saisd.net/page/dis-history>.

² Retrieved from <https://www.mysanantonio.com/opinion/commentary/article/School-district-consolidation-Can-it-work-4701237.php>.

³ Retrieved from <https://www.saisd.net/page/article/1383>.

⁴ Retrieved from

https://rptsvr1.tea.texas.gov/cgi/sas/broker?_service=marykay&_program=adhoc.addispatch.sas&major=st&minor=c&loop=1&_debug=0&charsln=120&linespg=60&endyear=22&selsumm=sd&key=San+antonio&format=W and https://rptsvr1.tea.texas.gov/cgi/sas/broker?_service=marykay&_program=adhoc.addispatch.sas&major=st&minor=c&loop=1&_debug=0&charsln=120&linespg=60&endyear=22&selsumm=ss&key=San+antonio&format=W .

district students, 15.5 percent are students with disabilities (SwD) and 15 percent of all EB students are SwDs.⁵

From 2018-19 to 2021-22 SAISD's population of students receiving special education grew by 4.5 percentage points to 15.5 percent. One reason for this growth relates to changes in TEA's monitoring after U.S. Department of Education (ED) January 2018 findings of noncompliance against the state agency. ED found that TEA violated federal law by effectively capping special education eligibility rates at 8.5 percent when it monitored school districts with rates exceeding this level. The agency found credible statements that school officials expected a lower level of state monitoring if they held eligibility rates to the state cap. Prior to this model in 2002-03 Texas's eligibility rate was 11.6 percent, which then decreased to 8.8 percent in 2016-17.⁶

On April 11, 2022, seven months after the former superintendent left SAISD to become the Chicago Public Schools' CEO, the board of trustees selected Dr. Jaime Aquino to lead the district, and on May 2nd he assumed the superintendency. In this role, Dr. Aquino is building on his 35 years in education as a bilingual educator and broad administrative experience in various school districts, including the nation's two largest, to improve student outcomes in the district.

METHODOLOGY AND ORGANIZATION OF FINDINGS

The Council SST reviewed a voluminous amount of data, and written information/documents in response to the team's initial/supplemental requests. In addition, the SST conducted 30 interviews with about 150 persons individually or in small groups and reviewed publicly available TEA/federal data. This qualitative/quantitative information was triangulated to inform our findings and recommendations. Our report does not reference or quote any individuals, although school district position titles are referenced when necessary for contextual purposes.

In addition to this Chapter –

- SAISD background information is Chapter 2.
- The executive summary is Chapter 3.
- The results of the Council's review and recommendations for SAISD review and follow up actions are in Chapter 4.

⁵ Students with disabilities who have individualized education programs (IEPs) and receive special education services are also referred to as students with IEPs. For this report, unless otherwise stated, students with disabilities exclude those who are eligible for services under Section 504 of the Rehabilitation Act (Section 504).

⁶ <https://www.texastribune.org/2018/01/18/special-education-reform-plan/>

CHAPTER 3. EXECUTIVE SUMMARY

San Antonio Independent School District (SAISD) asked the Council of the Great City Schools (Council) to review the district’s provision of special education and to make recommendations for improving educational outcomes for students with disabilities (SwDs). To conduct this work, the Council assembled a team of special education experts with strong reputations for this area of work in their own districts. The team visited San Antonio in March, conducted numerous interviews, reviewed documents, and analyzed data. (See the Appendices for the details of these areas.) At the end of the visit, the team formulated and presented preliminary observations and recommendations. Based on interviews and review of data/documents, the following key themes surfaced, which are summarized below. These and other areas are addressed fully in this report.

An overarching concern arises from SAISD’s system of schools practice that has resulted in diffused responsibility and unclear lines of accountability for teaching and learning. Interviewees addressed the lack of curricular coherence associated with school autonomy (that includes district run and 1882 schools), which challenges the provision of central office assistance needed to support core instructional practices.

There is a significant level of autonomy among schools, particularly the 1882 schools, which has resulted in a complete lack of coherence. This lack of coherence poses challenges for the central office in effectively supporting the schools, particularly 1882 schools, as the wide variation in curricular programs makes it exceedingly difficult for the teaching and learning and special education departments to possess comprehensive knowledge of all programs. Consequently, central office personnel find it challenging to ascertain whether students' poor performance is a result of the curriculum or inadequate instruction. The varying curricula also hinder the provision of impactful professional development opportunities.

These are exacerbated by communication breakdowns and fragmentations between central office staff and with campus personnel. These conditions significantly impact core curriculum implementation, interventions/supports for students struggling with academics or behavior challenges, and receipt of needed professional learning opportunities for teachers. With 40 percent of SAISD campuses having charters, SAISD challenges in these areas are further complicated. The following five areas are addressed under this overall theme, which has impacted all students including those with disabilities: multi-tiered system of supports (MTSS); behavior and social-emotional support; receipt of professional learning; class scheduling; and charter schools and equitable choice.

Various interviewees expressed concerns about SAISD campuses with small schools, which with relatively low numbers of SwD negatively impacts their economy of scale and distribution of special education resources. Also, the provision of initial assessments and related services is more difficult in these schools because of the need to share personnel and accommodate travel times,

which could be significant. Reportedly, based on surveys with parents of children who are leaving the district respondents expressed more dissatisfaction when their children were educated at small schools. Furthermore, smaller schools are subsidized with additional funds not available to larger schools so their student needs can be met. Currently, various administrative positions are required for each campus, e.g., assistant principal, etc., and there is a desire to right-size funding and personnel. Under consideration is a move to grant fair proportionate funding to campus administrators and allow them to determine how to best allocate the funds, e.g., principal, assistant principal, librarian, clerical staff, etc.

The marked growth of SAISD students in the area of specific learning disability (SLD) to its current 42 percent of all SwDs is based in major part on implications associated with two new significant Texas Education Agency (TEA) requirements. These changes have challenged district guidance/training to special education “Admission, Review, and Dismissal” (ARDs) teams to better ascertain if a student with dyslexia characteristics can receive appropriate instruction within general education or requires special education to improve reading achievement. In both circumstances, reading instruction for such students must significantly improve.

SAISD is faced with the challenge of addressing the large percentage of students who are reading below grade level standards. To significantly increase the learning curve a renewed districtwide effort is needed to give teachers the materials/training they need to ably provide instruction based on curriculum with a through line to Texas Success Initiative (TSI) college-ready standards. This charge applies to all but the few percentages of SwDs who participate in the STAAR alternative assessment and receive instruction aligned with associated standards.

SAISD does not have the same challenge as other school districts with whom the Council SST is familiar in that most of the district’s SwDs are educated in general education classes most of the time. (Although a larger than state portion of students are educated in separate classes, the district can address this issue by increasing the little used range of instruction in general education that is more than 40 percent of the time.) This circumstance a personnel to focus on teaching/learning taking place within general education classes, supplemented by special education. Educating most SwDs in this way is more effective than providing instruction in separate classes for the majority of the day.

Our team found that all SwDs who are/will participate in STAAR assessments do not receive core instruction based on grade level standards. As a result, teaching/learning is not aligned with STAAR assessments and TSI college-ready standards. Although one set of data given to the Council team shows special education graduation rates are high (80.7 percent), TEA’s state performance plan (SPP) reports a dramatically lower rate (37.8 percent) that does not consider courses with modified content. It is important for stakeholders to understand the reasons for these different rates and their relationship to preparing SwDs to be successful in “advanced coursework and high-quality career pathways.” (Always Learning plan at III.I) Helping to strengthen the Special Education Parent Advisory Council (SEPAC) and facilitating greater meaningful family involvement is also critical for their children to succeed.

The transition to instructional superintendents (IS) offers SAISD an opportunity to recalibrate collaboration and support to school leadership and staff. A proposed reorganization of diverse services is well designed but its impact on campuses is dependent on the extent to which the ISs and principals take ownership over teaching/learning particularly for SwDs. Typically, no school district has central special education personnel responsible for supervising school-based instruction. However, disability services personnel must be active and expert partners in this endeavor. A related issue is the allocation of special education teachers/IAs to schools, which has not been well-understood. The Council SST has recommended that SAISD adopt a collaborative campus, IS, and central office multi-departmental process to make transparent allocation decisions based on data-driven student needs.

Based on survey data from other school districts SAISD, employs a smaller number of full time equivalent (FTE) special educators, occupational therapists, instructional assistants, and physical therapists to enrolled SwDs compared to peer districts. Compensation issues, such as salaries lower than several neighboring districts and compression of pay issues, has contributed to the district's personnel shortages and overreliance on costly contractual services. In addition, the district's struggle to have sufficient substitutes has severely impacted training generally and especially for campus-based staff who have been unable to get the information they need for SwDs. Notably, the *Alternative Learning* plan addresses these issues at I.A.6. and Component V. We note that SAISD's substitute shortage is not unique. While substitute pay has increased, hiring shortages have persevered since the pandemic.

SAISD is commended for TEA's findings of compliance and relatively few complaints and due process hearing requests. However, there are concerns that SAUSD has not been able to maintain its record of timely evaluations for the growing number of students needing a special education assessment. With the recent U.S. Supreme Court's unanimous decision (allowing parents to file a federal lawsuit without exhausting due process hearing procedures) SAISD and other districts are more vulnerable when SwDs fail to receive an appropriate education and associated benefit.

There is a universal tension between the cost of special education and equitable district budgetary decisions for its instruction/services. Based on fiscal data SAISD provided to our team, special education comprises 12.1 percent of the total general fund budget for all programs. (Exhibit 5c) Of all funding sources the district receives, special education comprises 18.3 percent. (Exhibit 5d) This information shows that special education does not comprise a larger proportion of the district's budget compared to other school districts for whom the Council SST has experience.

Various interviewees expressed concerns about SAISD campuses with small schools, which with relatively low numbers of SwD negatively impacts their economy of scale and distribution of special education resources. Based on data provided to the Council SST, low campus overall enrollment does not automatically reflect low numbers of SwDs. However, SAISD has an issue with respect to campuses that are under-enrolled compared to capacity. Some 85 campuses enroll 42,154 students, which with 22,589 available seats comprise 65 percent of reported

capacities. In these circumstances, it is more difficult for schools to offer a full continuum of services and students must leave their community schools to receive the services they need, or they may need to change schools when their services change.

Finally, the Always Learning plan addresses in several areas the need for teaching/learning accountability. The report addresses these areas and provides comments for consideration regarding 1) the board's third goal for SwDs, 2) collaboration with disability services, 3) data and progress monitoring reporting to the board, 4) districtwide scorecard for board goals/guardrails, 5) department goals/scorecards, 6) district/campus improvement; and 7) alignment of school planning/school improvement processes, goals, and guardrails. The Council team recognizes that the Always Learning Plan is a strategic plan intended to provide an overarching framework, rather than a comprehensive account of all district work in every area. We also recognize that the Plan has been widely embraced and has garnered significant support. The district acknowledges that the Plan is a living document, and the issues raised in the report will be addressed as Plan components are operationalized.

Our report is organized by four major themes that are listed below along with their associated recommendations.

- I. Impact of SAISD's System of Schools on Teaching/Learning
 1. Leverage the resources of SAISD's school system to improve teaching/learning through MTSS
 2. Ensure SAISD's parameters for/implementation of school choice has equitable outcomes for all student groups
- II. Special Education Eligibility and Teaching/Learning Support
 3. Initiate strategies to improve decision-making for dyslexia 504 and SLD eligibility.
 4. Expedite improvement of instruction/supports to accelerate SwD achievement/postschool outcomes.
- III. Organization and Human Capital
 5. Maximize interdepartmental collaborative support to school personnel and SwDs.
 6. Improve disability services communication/timely assistance and organize personnel to maximize campus support.
 7. Ensure personnel supporting SwDs are employed/allocated in sufficient numbers to meet their needs.
 8. Improve SAISD's performance/compliance with federal/state indicators and requirements.
 9. Address various fiscal issues that impact effective operations of special education.
- IV. Operational/Fiscal Issues and Accountability
 10. Embed in the *Always Learning* plan accountability activities to increase inclusion of SwDs.

We know that special education is only one of several challenges that SAISD is facing. But with almost all SwDs educated most of the time in general education, their academic outcomes and behavior/social-emotional well-being is dependent in major part on significantly improving teaching/learning for all students. The public should know that it is going to take the district's leadership ~~some~~ time to address the challenges identified in this report and implement associated recommendations. While some activities may be done within a relatively short time, others may need to be made as part of a strategic plan over multiple years. We urge the SAISD leadership to share this information broadly along with continuous progress reports for to show the district's active commitment to this process. The Council of the Great City Schools stands ready to help the district and its leadership in any way that is deemed beneficial and constructive.

CHAPTER 4. CONTEXTUAL INFORMATION AND RECOMMENDATIONS

SAISD representatives shared that ongoing complaints about special education were their driving force for inviting the Council's SST to San Antonio. Generally, issues raised by speakers at the board of trustee meetings, and by principals, parents, and various assessment/service groups. These issues involved such areas as working conditions, compensation, sufficient staff, vacant positions, substitute availability, support availability and responsiveness (especially for students with significant behavior concern, and training. With a new disability director about 2.5 years ago, there is belief that special education has improved in many areas, but complaints have persisted. There is also concern that while teaching/learning overall is improving, achievement for students receiving special education has stagnated. This concern as well as those listed above are like those that typically surface in the Council SST's prior 31 special education reviews. Post pandemic, many of these issues have persisted across the country.

Our review of data and written information, and stakeholder feedback reflected these concerns and the underlying bases for them. We also reviewed SAISD's latest *Always Learning* plan, which covered to some extent most of the issues presented to the SST. Our report takes into consideration the plan's content for consideration of the SST recommendations. The team's findings and related recommendations are organized under the following five themes:

- I. Impact of SAISD's System of Schools on Teaching/Learning
- II. Special Education Eligibility and Teaching/Learning Support
- III. Organization and Human Capital
- IV. Operational/Fiscal Issues and Accountability

I. IMPACT OF SAISD'S SYSTEM OF SCHOOLS ON TEACHING/LEARNING

One group of expressed concerns arise from SAISD's system of schools practice that has resulted in diffused responsibility and unclear lines of accountability for teaching/learning. These are exacerbated by communication breakdowns and fragmentations between central office staff and with campus personnel. Such conditions significantly impact core curriculum implementation, interventions/supports for students struggling with academics/behavior, and receipt of needed professional learning. With 40 percent of SAISD campuses having charters, SAISD challenges in these areas are further complicated. The following five areas are addressed under this overall theme, which impacts all students including those with disabilities.

- A. Multi-Tiered System of Supports (MTSS)
- B. Behavior and Social-Emotional Support
- C. Professional Learning
- D. Class Scheduling
- E. Charter Schools and Equitable Choice

A. Multi-Tiered System of Supports

In 2012, CGCS published a white paper on Multi-Tiered System of Supports (MTSS)⁷ focused on the framework and its foundational importance for teaching/learning. The Council took this step based on SST findings that too few school districts were aware of the framework or too many were implementing it during daily practice but not doing so as intended.

Briefly as the Council's white paper describes, the MTSS umbrella framework uses data-based problem-solving techniques to integrate academic and behavioral/social-emotional core instruction and increasingly intensive tiered intervention that are based on individual student needs. An important core MTSS principle is that student achievement will not improve without the base provision of strong core instruction with differentiated approaches and interventions available for each student.⁸ Without this strong teaching/learning foundation, districts rely on more intensive interventions for too many students. This action not only puts pressure on the limited available personnel but is often too late and too little for students to catch up with peers who are continuing to achieve. Furthermore, this paradigm results in increased special education eligibility for students who then have academic performance significantly below their peers and now exhibiting behavior challenges.

MTSS Handbook

Our review of the district's MTSS Handbook and training offerings revealed that they are comprehensive and reflect the educational literature's consistent description of MTSS principles. For example, it describes MTSS as inclusive of every educational program, including special education and 504, and students needing interventions continue to receive instruction in the core curriculum. Explicitly stated is the expectation that this curriculum is to be supplemented, not supplanted, by tiered interventions. The Handbook also includes –

- Interventions. Various reading and math interventions available for campuses based on a matrix for each tier by subject and grade level. (Information about reading interventions is discussed further below under, "Reading.")
- Speech/Language. Descriptions of speech/language developmental and articulation skills.
- Selection Criteria. A link to intervention selection criteria for campus personnel to assess the quality and alignment of materials Individual campuses may purchase through grants, special programs, campus funds, or with funding for specific materials needed for students with unique needs.
- Fidelity Checks. Detailed information to support implementation and fidelity checks.

⁷ Common Core State Standards and Diverse Urban Students: Using Multi-Tiered Systems of Support. Retrieved from <https://www.cgcs.org/cms/lib/DC00001581/Centricity/Domain/87/77--Achievement%20Task%20Force--RTI%20White%20Paper-Final.pdf>.

⁸ This principle is adjusted for students with IEPs appropriately identified to take alternate statewide assessments (e.g., STAAR-Alt) based on a modified curriculum.

- Implementation Plans. Development of implementation plans for MTSS, with goals and progress monitoring that may be for groups of students with similar needs or individual students.
- Branching Minds. This automated system supports tier assignment and monitoring student growth. According to SAISD representatives, the platforms bring together all MTSS components across academics, behavior, and social-emotional learning (SEL) domains to guide teachers/administrators through best practices to ensure fidelity of implementation. It houses data, meeting information, family communication, and interventions. However, according to an SAISD representative, with two charter exceptions, all campuses are expected to use Branching Minds. Based on monthly audits, campus use varies from 100 percent to 20 percent.

While the above presents information showing how MTSS is expected to be implemented, those interviewed reported that practice across schools often falls short of expectations.

Organizational Support for MTSS

Based on the organizational chart provided to the Council team, MTSS responsibility is housed under the district's academic branch, which the deputy superintendent oversees with 10 direct reports. One executive director oversees three areas: early childhood education/head start; organizational learning/ support services; and learning/compliance support services. MTSS is housed within the last group, along with 11 other random units, such as individual graduation committee, online learning, evening FLEX high school, credit recovery, master scheduling, etc.

Overall Interview and Focus Group Feedback

Across multiple interviews, including staff from multiple departments, student achievement was rarely mentioned. Instead, discussions/feedback focused on adult structures and needs. Although our interviews reflected strong awareness and understanding of the MTSS framework, implementation practices have been negatively impacted by leadership and departmental changes over the past several years. Interviewees shared several examples of ways in which implementation practices have broken down, including –

- No through line from established procedures and expected practices to available resources and training.
- Inadequate time for educators to input necessary documentation.
- Insufficient use of research-based interventions most effective for students with diverse needs.
- Inconsistent MTSS practices across campuses, with some more fully following expected practices and others leaving this task to one person. The perception is that campuses are more likely to be successful when principals are engaged and provide leadership in this area.

- Use of targeted (Tier 2) and intensive (Tier 3) interventions that do not consistently supplement (and instead supplant) core curriculum instruction (Tier 1).

Academic Curriculum and Core Instruction

A school district's curriculum holds the "collected wisdom" about what is most important to teach. The curriculum is based on state standards upon which students are assessed and give a vision of the appropriate content and processes that must be taught. Curricular content is subject area based and outlines what students should be able to learn across a range of grade levels and within various periods of time, such as a quarter, semester, or year. This information is used to focus and guide classroom instruction and assessment. Also, the curriculum sequences the order of instruction so that students can learn the prerequisite skills and information necessary to learn the next unit or grade level content area.⁹

Currently, the executive director for curriculum, instruction, and assessment leads eight directors for reading (elementary and secondary), math (elementary and secondary), science, social studies, advanced academics, and health/PE. The review team heard that:

- **Curriculum.** SAISD's curriculum had been very tight and scripted, and transformed to one that is very loose. While the current model may be useful for teachers with significant experience at various grade levels it does not benefit novice teachers. Also, the lack of a consistent campus-wide curriculum potentially leaves too many students without instruction on areas of curricular content covered on the STAAR assessment.
- **Pacing Guides.** SAISD pacing guides are not implemented consistently within and across campuses.
- **Materials.** Curricular materials are inconsistently used and purchased across the district. This circumstance, along with the use of a nonstandard or flexible curriculum makes it difficult for central office staff to support school personnel asking for or needing assistance. This also impacts students transferring between schools during the year.

Overall, interviewees shared their perception that high quality teaching and learning depends on principal leadership and individual teacher abilities. These conditions have created pockets of students who succeed and groups of children who do not receive the core instruction and supplemental support they need to learn. As a result, more students require Tier 2 and 3 interventions and there is an increasing reliance on special education services to address individual student needs. These issues are a natural outcome of curricular and calendar autonomy, and 1882 charters.

⁹ Source: Chapter 1. Curriculum, Instruction, Assessment and Standards. Retrieved from https://www.sagepub.com/sites/default/files/upm-binaries/6919_squires_ch_1.pdf.

Always Learning/Siempre Aprendiendo Strategic Implementation Plan

Several interviewees shared that SAISD is taking steps to develop a more structured curriculum with daily guidance to manage implementation, including, e.g., units of study, supports, writing prompts, assessments, resources, etc. The structure will be written in a way that allows for teacher creativity. Exhibit 1a shows relevant content from SAISD’s February 13, 2023, *Always Learning/Siempre Aprendiendo (Always Learning) Plan*. The information reflects three component’s: objectives, activities, and/or outcomes.

Exhibit 1a. Always Learning Selected Content for MTSS/Curriculum

I.A.1. Create profiles of thriving students that outline standards at each milestone Outcome. Profiles will be used to determine multi-tiered systems of support...

I.A.3. Profiles of thriving classrooms are used to select curriculum, instruction, and assessment resources published in the SAISD Curriculum Management plan.

II.A. 6. Create common district-wide definitions of differentiation with exemplars across content areas and grade levels, including linguistically responsive instruction, accommodated instruction, accelerated instruction, and enrichment..... Work with Human Capital Management to assemble a cadre of substitutes specifically for coverage for professional development by August 2023.

II.B.5. Create new protocols to analyze and interpret student data from the redesigned STAAR assessment, particularly for interactive item types including short constructed responses. Outcome. school leadership has increased capacity and confidence to establish a school instructional plan that supports achievement for all students. (See Exhibit 1f. reference to a school-based comprehensive culture/climate plan.

III.C: Literacy and Biliteracy. Build a strong foundation of college-ready literacy and biliteracy curriculum that engages students in learning anchored in the science of teaching reading and that provides authentic opportunities to cultivate reading for a wide range of purposes.

III.C.3.¹⁰ Enhance the curriculum by creating teacher planning guides and daily lesson sequences to move toward a high-quality, uniform districtwide curriculum....

III.C.7. Implement evidence-based Tier 1 supports for core instruction, Tier 2 and Tier 3 supports for accelerated learning for students not performing at grade level and challenging enrichment supports for students needing enrichment through structures.... (Repeated for math, science, and social studies.)

Below are the Council SST’s comments associated with selected *Always Learning* sections.

I.A.1. Thriving Student Profiles. As explained by an SAISD representative, such profiles will include milestone standards for such areas as academics, self-regulation, social emotional learning, physical health, etc. It is not clear how these profiles will be measured to address students learning with a modified curriculum aligned with the STAAR-Alt. The same concern applies to the application of profiles for thriving schools having a large group of these students.

MTSS. Using a word search, a single reference to MTSS is included only briefly at I.A.1. This reference was written as an outcome for the use of thriving student profiles, “determine multitiered system of supports.” It is not clear how a student profile would “determine” MTSS.

¹⁰ The posted plan had two activities listed with a number 1. This activity is actual the third under Objective III.C.

This important framework, which is inclusive of instruction based on core curricular expectations in all areas and data informed and monitored increasingly intensive interventions, requires more comprehensive attention. According to an SAISD representative, the term MTSS was not used because it is largely unfamiliar to families. Instead, Tier 1, Tier 2, and Tier 3 terms were used. Nevertheless, the use of MTSS is broader than tiered instruction. Ensuring that teachers and administrative staff have a full understanding of the framework will be important for ensuring full implementation of the system.

I.A.3. Curriculum Management Plan. Using thriving classroom profiles to create teaching planning guides/daily lesson sequences will face significant implementation barriers if the district does not specifically account for the large group of students needing intensive/targeted interventions to succeed. These planning guides/lesson sequences should also reference how specially designed instruction and education for emergent bilingual students are included.

II.A.6 and III.C.7. Reading Support. Without referencing MTSS, these activities refer to differentiation and to evidence-based reading supports for all tiers of reading instruction/intervention. As above, these issues have implementation challenges, e.g., expectations for practice, autonomy, etc. The plan does not reference the development of pathways and supports to address these, and other implementation challenges addressed above.¹¹ Given the group of students who are below approaching grade level (GL) standards as well as those approaching GL, it is probable that more students require intensive/targeted interventions than there are human resources. A close examination of how core instruction will stretch, be implemented with fidelity, and be sufficiently differentiated for these students to learn requires an “all hands-on deck” approach for immediate action. In addition, the plan makes no reference to the important practice of universal design for learning (UDL).¹² (On a positive note, the plan calls for a substitute cadre for teachers to attend professional development.)

II.B.5. Student data used for school instructional plans for all students. This activity is briefly referenced only once as an outcome of student data analysis. One other reference at IV.D.4 appears as an activity to “Establish a district standard for creating schoolwide/classroom management plans based on the principles of PBIS and restorative practices.” (See Exhibit 1e.) An overarching MTSS activity would integrate academic and behavior/social-emotional wellbeing.

Reading Achievement and Instruction

Reading proficiency is a critical pathway to support academic achievement overall and college, career, or military readiness (CCMR). According to the National Assessment of Adult Literacy, two-thirds of students who cannot read proficiently by the end of the fourth grade will end up in

¹¹ Additional plan activities relate to tiered instruction/intervention for mathematics, science, and social studies.

¹² Retrieved from <https://udlguidelines.cast.org/>.

jail or on welfare.¹³ Levar Burton, producer of the new documentary film, “[The Right to Read](#),” refers to reading as “the greatest civil rights issue of our time.”¹⁴ Aligned with this declaration, the second board of trustee’s goal calls for improving reading and writing outcomes for all students. The February 13, 2023, board progress update presentation included achievement goals for four grades with middle of the year (MOY) achievement or estimates of end of year (EOY) achievement based on MOY rates. For grade 1, the EOY Tier 1 MAP goal (by MOY) was exceeded. All STAAR goals for grades 3, 6, and English 1 had achievement rates ranging from 32 to 46 percent and at MOY were projected to be missed by 12 to 14 percentage points. Specifically-

- **Grade 1.** By MOY, children exceeded by 5 percentage points the 41 percent Tier 1 MAP EOY goal.
- **Grade 3.** With a 36 percent STAAR goal of meet/above GL, 23 percent were projected to meet the goal based on MAP MOY.
- **Grade 6.** With a 32 percent STAAR goal of meet/above grade level, 19 percent were projected to meet the goal based on MAP MOY.
- **English 1.** With a 46 percent meet/above STAAR status, 32 percent were projected to meet the goal based on semester exam results.

STAAR Reading At and Above Grade Level and ACT/SAT for All Subjects

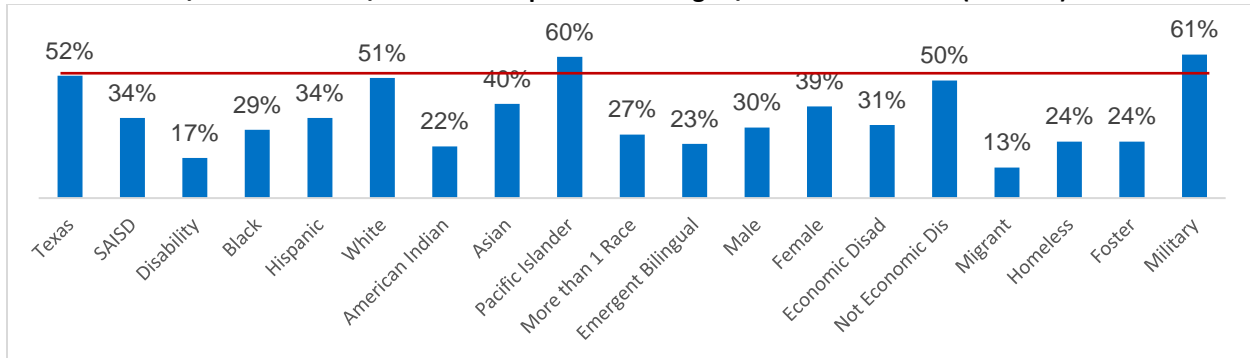
TEA’s 2021-22 STAAR data reported achievement rates for district students at/above GL. Overall (except for two student groups) SAISD students are achieving far below state averages.¹⁵ As shown in Exhibit 1b, 34 percent of district students read at/above grade level compared to almost 52 percent of Texas students. Compared to the overall SAISD average, Pacific Islanders (60 percent) and students from military families (61percent) exceeded the state rate. White (51 percent) and students not economically disadvantaged (50 percent) almost met the state average. Six groups had rates below 25 percent: homeless and foster (24 percent each), EB (23 percent), American Indian (22 percent), SwD (17 percent), and migrant (13 percent). Data for students with disabilities by these student groups are addressed at section II.C. further below.

¹³ Governors Early Literacy Foundation, retrieved from <https://governorsfoundation.org/gelf-articles/early-literacy-connection-to-incarceration/#:~:text=Illiteracy%20and%20crime%20are%20connected,above%20a%20fourth%20grade%20level.%E2%80%9D>

¹⁴ T Gardner and J Berkley, Why reading is the greatest civil rights issue of our time: Opinion, retrieved from https://www.yahoo.com/entertainment/why-reading-greatest-civil-rights-093308866.html?fr=yhssrp_catchall.

¹⁵ TEA 2022 Federal Report. Retrieved from https://rptsvr1.tea.texas.gov/cgi/sas/broker?_service=marykay&_program=perfprept.perfmast.sas&_debug=0&frc=yes&ccyy=2022&lev=D&id=015907&prgopt=2019%2Ffrc%2Freport_card.sas.

Exhibit 1b. State/SAISD Students/Student Group Rates Reading At/Above Grade Level (2021-22)



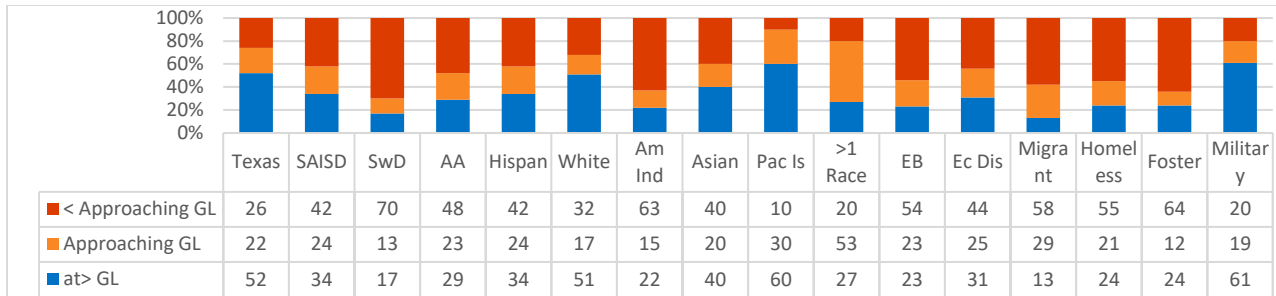
STAAR Reading Below Approaching Grade Level

As shown in Exhibit 1c, large rates of SAISD students are reading below approaching GL achievement. Overall, compared to the state’s 26 percent rate, the 42 percent of all SAISD students scoring at this level were unlikely to succeed in the next grade/course without significant, ongoing academic intervention and demonstrate insufficient understanding of assessed knowledge/skills.¹⁶

- **Over 50 percent of Students in Group.** Six student groups had rates with more than half of their students not approaching GL. These groups were SwD (70 percent); foster (64 percent); American Indian (Am Ind, 63 percent); migrant (58 percent); homeless (55 percent); and emergent bilingual (EB, 54 percent).
- **Low Student Group Rates.** Three student groups had rates lower than Texas: military and more than one race (each 20 percent); and Pacific Islander (Pac Is, 10 percent).
- **Remaining Groups.** Student groups not mentioned above are white (32 percent); Asian (40 percent); Hispanic (Hispan, 42 percent); economically disadvantaged (Ec Dis, 44 percent); and African Americans (AA, 48 percent).

Exhibit 1c. State/SAISD Student Group Rates at Three Achievement Levels (2021-22)

¹⁶State of Texas Assessments of Academic Readiness (STAAR®) Performance Labels and Policy Definitions, retrieved from https://tea.texas.gov/sites/default/files/STAAR_Performance_Labels_and_Policy_Definitions.pdf.



Number of Students Requiring Reading Targeted or Intensive Intervention

The combined group of approaching/not yet approaching GL represents 66 percent of all SAISD students, with a majority of each subgroup likely needing targeted or significant on-going interventions to succeed. TEA’s MTSS Overview reflects an expectation that typically 20 percent of all students require targeted interventions while some 5 percent require intensive interventions.¹⁷ (See Exhibit 1c.) SAISD’s Handbook (page 9) reflects a smaller portion of students expected to require Tier 2 targeted interventions (10-15 percent) and Tier 3 intensive/individualized interventions (1-5 percent). This data reflects what some refer to as a “flipped pyramid,” showing most students require targeted or intensive interventions and exceed human resource capacity.¹⁸ (It is important to note that the state expectation considers all students across the state and assumes that students needing Tier 2 and Tier 3 interventions are equally likely in every district or school. That assumption is not correct.)

Board of Trustees’ Goal 1 for Reading and Writing

In recognition of SAISD students’ persistent underachievement in reading, the board and district administration established an outcome for improved reading/writing as their first goal. The various curriculum and teaching/learning issues addressed above are particularly relevant to the provision of core evidence-based reading instruction necessary to increase the trajectory of student reading proficiency rates. For example, providing reading intervention for struggling students that supplements core instruction gives students the opportunity to learn content information covered by STAAR assessments. As discussed in section I.C. below, this opportunity is too often dictated by schedules that lead to instruction that supplants core instruction, providing reading instruction off-grade level and unrelated to GL standards/curriculum. The area of dyslexia, which may affect 20 percent of the population,¹⁹ is addressed below at section II.B.

Reading Interventions

The MTSS Handbook (pages 53-54) has a reading instruction matrix that lists Tier 2/3 interventions/practices by grade level. The interventions are not differentiated by Tier 2 and Tier

¹⁷ Retrieved from <https://tier.tea.texas.gov/sites/tier.tea.texas.gov/files/2020-12/MTSS-Overview.pdf>,

¹⁸ Understanding Tier Patterns and Movement in MTSS, Branching Minds, retrieved from <https://www.branchingminds.com/blog/understanding-tier-patterns-and-movement-in-mtss>.

¹⁹ Retrieved from <http://www.dyslexia.yale.edu/>.

3, but the intensity of instruction is specified with Tier 3 having smaller student groups, and more weekly days of instruction and longer sessions. Overall, the following content is noteworthy.

- **TEA’s Texas Gateway T2** (Targeting the 2 Percent) lessons focusing on the five foundational areas of reading are listed for grades K-5. The T2 website’s overview specifies its purpose is to improve “instruction, content knowledge, and academic achievement of Texas students transitioning from assessments based on modified standards to the general assessment” [STAAR].²⁰ This reference relates to TEA’s prior statewide assessment based on modified academic achievement standards that the U.S. Department’s regulation eliminated in 2015. Regardless, only experienced intervention teachers would have the means to navigate the state’s T2 website and select appropriate lessons for each student. This activity may be extremely challenging for new teachers and substitutes for vacant positions. SAISD also provides Tier 2 and 3 intervention resources that are separate and apart from Texas Gateway.
- The **Florida Center for Reading Research** is listed as an intervention for PK, and grades 3-5. A search of this site’s research data base for PK provided a single audio explanation of why early screening and proven, effective reading intervention are critical to mitigating reading disabilities in children. Grade level literacy walkthrough models and many pages of various reading materials are posted. The site is useful for research but not for a busy teacher with limited time.
- **Various interventions** were listed for dyslexia [Dyslexia Really Great Reading (K-8); for dyslexia and special education [Voyager’s Learning Language Live! (6-8); and for special education (Really Great Reading)].

Dyslexia

As referenced above, about 20 percent of the population may have dyslexia.²¹ The 2021 updated *TEA Handbook for Procedures Concerning Dyslexia and Related Disorders* (page 39) specifies the use of a standard protocol for dyslexia instruction. The protocol requires use of evidence-based, multisensory structured literacy instruction that is explicit, systematic, and intentional in its approach. Instruction must be evidence-based, taught by an appropriately trained instructor; and implemented with fidelity. “Multisensory learning involves the use of visual, auditory, and kinesthetic-tactile pathways simultaneously to enhance memory and learning of written language. Links are consistently made between the visual (language we see), auditory (language we hear), and kinesthetic-tactile (language symbols we feel) pathways in learning to read and spell.”²² Instruction focuses on explicit, direct, cumulative, and intensive teaching, including the structure of language.

²⁰ Retrieved from <https://meadowscenter.org/project/targeting-the-2-percent/>.

²¹ Retrieved from <https://www.dyslexia.yale.edu/dyslexia/dyslexia-faq/>.

²² Multisensory Teaching for Dyslexia, retrieved from <https://www.ldau.org/multisensory-teaching-for-dyslexia>.

Written information provided to the Council SST states that all schools have at least one staff member per campus who provides dyslexia services, and districtwide support is provided by 24²³ dyslexia specialists and/or special education teachers.²⁴ Another document states, “Currently, services are provided by either a district level Dyslexia Program Specialist or a Reading Resource teacher trained in dyslexia interventions.” (Section II.B. addresses issues involving the use of general education or special education for instruction.)

Four interventions were provided in SAISD’s Dyslexia [Model](#) document, two of which are for EB students. Differing from the MTSS Handbook matrix, these interventions are designed for 45 minutes of daily instruction. Interventions for monolingual students are 1) Institute for Multi-Sensory Education (IMSE) Comprehension (grades K-5) and Dyslexia Lexia PowerUp (grades 6-12). IMSE was not listed in the MTSS Handbook and Voyager’s Learning Language Live! (6-8) is not listed in the Model document. In addition, two reading interventions are listed for EB students. Esperanza (K-5) is a Spanish multisensory structured language approach and WELLS2 (3-5) supports transition to an English program with an evidence-based literacy approach that is not multisensory.

Given the importance of core English language arts instruction for all students, which would be supplemented by intensive interventions for students with dyslexia and students achieving below GL expectations, the use of text to speech technology would be helpful for students to listen while engaging with GL text too difficult for them to read. Interview feedback indicated that this accommodation may be used during independent reading but not during core instruction even if the text is too difficult for the student to read.

The *Always Learning* plan refers to dyslexia a single time (Exhibit 1d) and that is in association with the use of instructional intervention teachers.

Exhibit 1d. Always Learning Plan Related to Reading Intervention and Dyslexia

III.C.1. Provide each school with an Instructional Intervention Teacher (IITs) that provides reading intervention and dyslexia services. ... IITs develop intervention plans in conjunction with the classroom teacher and/or special education teachers. (2024)

Given data described above about the number of students not meeting GL reading standards, including those identified as having dyslexia, this area requires more attention when implementing the *Always Learning* plan. In addition to material resources, the human resources available to meet student needs merit attention. For example, clarification is needed for the use of dyslexia specialists to teach students with/without IEP without regard to a specialist’s area of certification. Also, it should not be assumed that all special educators teaching reading to students achieving far below their GL are as highly trained in the area of dyslexia. SAISD assigns an instructional intervention teacher for every school to have a dedicated and highly skilled

²³ Source: SAISD Disability Department Organizational Chart provided to the Council SST.

²⁴ [Model](#).

reading teacher. However, currently there are too many small schools for each school to have a full-time personnel. As a result, the district allocates these positions, and some schools must share staff.

B. Behavior and Social-Emotional Supports

The MTSS framework integrates support for academic achievement and behavior/social-emotional wellness. This integrative approach is essential because students frequently exhibit challenges in both areas, impacting progress in each. For example, students with/without disabilities having significant challenges associated with positive behavior and social-emotional wellness typically have difficulty learning, and often have teachers who have run out of successful strategies to intervene. When this occurs, teaching/learning is disrupted for both the student and class, and student frustration/anxiety increases with poor outcomes.

Positive Behavior Intervention and Supports

Since October of 1998, the federally funded National Positive Behavior Intervention and Supports (PBIS) Center has been providing the nation's schools with resources in this area. The Center describes PBIS as an evidence-based, tiered framework for supporting students' behavioral, academic, social, emotional, and mental health. When implemented with fidelity, [PBIS improves](#) social emotional competence, academic success, and school climate. It also improves teacher health and wellbeing. It is a way to create positive, predictable, equitable and safe learning environments where everyone thrives.²⁵ As such, PBIS fits within the MTSS framework by incorporating whole school, class, and student core teaching/support and increasingly intensive interventions. Programs such as social-emotional learning and restorative practices live within the MTSS framework.²⁶

Focus Group Feedback

A portion of focus group conversations involved the increasing growth of student behavior/mental health needs and increasing associated caseloads and calls for help post Covid. The following areas reflect their concerns.

- **Training/Support.** Without necessary training, new teachers (general and special education) especially are not equipped to address the growing needs of these students. Overall, interviewees expressed a high need for support, including the modeling of exemplary strategies to reduce outburst triggers and behavior escalation.
- **Availability.** Staff support by behavior specialists or others with relevant expertise is too often unavailable to help classroom teachers faced with behavior they cannot address effectively.
- **Timely Response.** Specialized staff lack the capacity to respond in a timely manner due to large and growing caseloads.

²⁵ Retrieved from <https://www.pbis.org/pbis/what-is-pbis>.

²⁶ See Alignment of the PBIS Framework and Restorative Practices, retrieved from <https://www.bloomu.edu/documents/alignmentpbisrestorativepractices> and <https://www.pbis.org/resource/teaching-social-emotional-competencies-within-a-pbis-framework>.

- **Contacts.** It is not always clear who to contact for help, and too frequently staff reach out to people they personally know to help identify appropriate contacts.
- **PBIS.** Districtwide support to campuses for PBIS ended after TEA's grant was over and years of investment "went by the wayside." Although every campus is expected to have a PBIS team, implementation does not consistently occur as intended absent a campus administrator who prioritizes the activity. Campus focus shifts, especially with high administrative turnover, which impacts implementation. There is a perception that PBIS is shifting to Restorative Justice; however, that activity is an aspect of and not intended to supplant PBIS. (See footnote 22.) Interviewees indicated that behavior issues have increased as districtwide support disappeared, which also coincided with the onset of post-Covid escalation of behavior/social-emotional issues. While SAISD continues to provide PBIS training, this activity is not available within the school day due to a lack of substitute teachers. As noted previously, the substitute shortages have been a national post-pandemic issue.

Central Office Support and Program Sponsorship

Spread among several departments, various types of personnel supports are provided to campuses as a whole, to teachers with students having significant behavior/social-emotional issues, or to particular student groups, e.g., homeless. This organizational structure has led to confusion about who to contact for what and has detracted from a larger pool of individuals who may be assigned to a smaller group of campuses. Proportionate (or braided) funding is a tool for blending fund sources to reduce personnel fragmentation.²⁷

Below are the various lines of central office support.

Behavior Specialists. A major departmental change for behavior specialists occurred about seven years ago. At the time, about 23 behavior specialists reported to special education, each with five to seven schools to support. Currently, specialists are housed in two departments, 1) disability services and 2) social, emotional, and academic development (SEAD) and restorative practices. SEAD was created to give a basic level of support for all students overall because at the time the greatest demand for support was associated with general education students. The disability services department currently has six behavior specialists and SEAD has eight specialists with more than 200 requests for help. Reportedly some of these specialists have been on special assignments and unable to carry out their normal support duties. The behavior of students with/without disabilities require the attention and support of these specialists. The small school structure makes it more difficult for the specialists to efficiently address student needs.

Social Workers. According to information SAISD shared with the Council SST, the district employs some 40 social workers, including 3 contractual and 2 vacancies. The district organizational chart shows the following distribution of social workers.

²⁷ Leveraging Resources: Blending and Braiding Funds, retrieved from <https://www.isbe.net/Documents/Blending-and-Braiding-061121.pdf>.

- **Early Childhood Education/Head Start** has a Communities in Schools parent/child emotional wellness team with two social workers.
- **Student and Academic Support Services** has an “Initiative” Team with an LCSW coordinator, and 15 lead social workers for its school aged parenting program (SAPP). The unit also has a social worker for foster care, four for students who are homeless, and two for the Handle with Care initiative that partners with the San Antonio Police Department for children exposed to violence and abuse/neglect.²⁸

Con Cariño: School Mental Health with Heart Project. SAISD received the U.S. Department of Education’s safe and supportive schools grant to enhance the district’s internship to employment pipeline for Licensed Master Social Workers (LMSWs), increasing the number of LMSWs by December 2026. The grant will also support a pathway for counseling interns to decrease the estimated 19 percent counselor turn-over rate.

Campus Crisis Team. Each campus is to have a crisis team, but interviewees were not confident that one is operational and effective at each school.

CARE Team. This team responds to behavioral crises beyond a campus’ ability to manage. The campus is expected to use its campus crisis response team first, but if the student’s behavior continues to escalate or does not show signs of de-escalating despite the team’s best efforts, the CARE Team may be called to assist. The CARE team, which supports students with/without disabilities, consists of three board certified behavior analysts (BCBA), one LSSP, and also works with a campus social worker, and HCA Healthcare social workers. The team directly intervenes in the crisis and then provides follow-up services post-crisis.

Community in Schools. According to its website, the program is used to teach students positive ways to cope with anger, conflict resolution, and develop other strategies to focus on learning.²⁹ CIS provides SAISD with significant support through multiple clinicians, licensed master social workers, licensed social workers, and social services providers.

San Antonio Wellness Mobile Unit. With a group of nonprofit organizations, the mobile units bring services to schools to provide a holistic approach to mental health for students, their families, teachers, and district staff.³⁰ The mobiles were piloted last year with eight campuses and received over 100 referrals. Full implementation is expected in 2028. Also, while SAISD has two school-based health clinics, information on their websites apply to physical health only.

Students Returning from Psychiatric Hospitalization

Support for students with/without disabilities returning from psychiatric hospitalization was raised as a particular concern. One interviewee suggested a review of Northside ISD’s temporary

²⁸ Retrieved from <https://www.saisd.net/page/article/47>.

²⁹ Retrieved from <https://www.cissa.org/our-work>.

³⁰ Retrieved from <https://mentalwellnesscollaborative.org/>.

placement process to support these students and also provide support to students who may otherwise be hospitalized. The National Center for Mental Health in Schools at UCLA supports the use of promising practices that are embedded into a unified and comprehensive system of student/learning supports, which are fully integrated into school improvement policy/practice.³¹

Always Learning/Siempre Aprendiendo Strategic Implementation Plan

The *Always Learning* plan at Exhibit 1e below shows content associated with the support of student behavior/social-well-being.

Exhibit 1e. *Always Learning* Content for Student Behavior/Social-Wellbeing

- IV. SAISD is committed to the social, emotional, and academic development (SEAD) of the whole child through the integration of SEAD into the educational experience in support of positive outcomes for students.
- A: Educate all students in healthy, safe, supportive, nurturing, and enriching environments in every school and classroom.
2. Determine barriers to African American/Black students' sense of belonging and establish practices, activities/structures that support these students specifically.
 4. Establish a district standard for creating schoolwide/classroom management plans based on the principles of PBIS and restorative practices. ... Set standards for schools to establish common area expectations/classroom rules which are taught or reinforced on a consistent basis beginning Aug. 2023.
 9. Respond to influences in the environment that may lead to problematic student behavior or risk to student safety by creating SEL lessons Outcome: Engage a minimum of 200 families in 2023-24 and each subsequent year a minimum of 1000 families.
- B: Evaluate all students annually to determine their acquisition and growth of social emotional skills.
- C: Foster social, emotional, and academic development (SEAD) of the whole child using frameworks and instruction such as SEL curriculums, restorative practices, and PBIS. Objectives includes receipt of SEL instruction (1); embed SEAD competencies/practices into academic instruction across the curriculum (2); daily social-emotional well-being check-ins with students (3); implement daily student check-in using social emotional well-being tool; 4) Implement SEL, restorative practices, and/or PBIS authentically.
- D: Implement a comprehensive, equitable, and positive school climate and culture plan at all schools
4. Establish a district standard for creating schoolwide/classroom management plans based on the principles of PBIS and restorative practices. ... Set standards for schools to establish common area expectations/classroom rules which are taught or reinforced on a consistent basis beginning Aug. 2023.

Overall, component IV provides a comprehensive school/classroom wide approach to the social-emotional academic development of students. In important areas, objectives apply to district standards (A.4), evaluation of *all students* for their acquisition/growth of social emotional skills (A.9) and school climate/culture plan at *all schools*. The following are a few noteworthy issues.

IV. Targeted/Intensive Interventions. No component objective includes reference to targeted/intensive intervention tiers that need to supplement school/classroom wide

³¹ Transitioning from Psychiatric Hospitalization to Schools, retrieved from <https://smhp.psych.ucla.edu/pdfdocs/hospital.pdf>.

approaches when necessary for individual students. Activity IV.A.9's creation of SEL lessons is not sufficient alone to respond to all environmental influences that may lead to problematic student behavior or risk.

IV.A.2. African American/black students. There are likely to be other student groups of students who experience, like those who are African American/black, a lack of belonging, e.g., homeless students, migrants, SwDs, etc.

IV.A.9. Alignment of SEL lessons to family engagement outcome. The creation of SEL lessons is not related to the activity's outcome, i.e., engage minimum of 200 families in 2023-24, etc.

IV.B. Evaluation of students. Consider how a social-emotional annual evaluation will take into consideration SwDs having behavior characteristics associated with their disability, such as students with significant intellectual disabilities, autism, etc.

C. Professional Learning

Our conversations with some 150 stakeholders reflected their common desire for teachers/instructional assistants (IA) to receive the professional development (PD) they need to educate and support their students, including the modeling of exemplary strategies to reduce outburst triggers and behavior escalation. Without necessary training, teachers (general and special education), new teachers especially, are not equipped to address the growing needs of these students. Reflecting this need, using a word search the *Always Learning* plan used the term professional development 214 times and training 119 times as a component/objective (II.B), activity, or timeline description. A combination of overarching factors, however, have been restricting access to training and have presented implementation barriers. Although a few training issues are particular to special education (addressed in Section II. Special Education Eligibility and Teaching/Learning Support), the information below describes operational factors stakeholders addressed. These factors are interfering with teacher/IA receipt of PD and negatively impacting instruction for all students, including SwDs.

Universal Access

There is no across campus structure for all teachers/IAs to receive PD identified as essential for them to have. Examples included sufficient training for core reading instruction, increasingly intensive supplemental tiered intervention; PBIS and tiered interventions/supports, etc.

SAISD has a large menu of PD available for campus personnel, which is differentiated for various groups of students. There is a bank of premade videos, curriculum/instruction modules and training opportunities. Joint disability services and curriculum/instruction training sessions are provided throughout the school year and include virtual PLCs through Canvas, Zoom meetings, and campus-based PLCs.

PD availability is not the problem. Rather, PD has not been received in amounts needed to improve teaching/learning (particularly for reading/behavior support) and by those most in need

of training for various reasons. Particularly post-Covid, teachers' access to PD declined because substitutes have been unavailable to cover classes. While this has been a challenge across the country, it nonetheless impacts the depth of PD available for staff. For example, the disability services' PD plan included professional learning networks (PLNs) for general/special educators, but the plan could not be implemented for this reason. Voluntary PD available after school and during EPIC Saturdays are plagued by poor attendance. With rare exceptions when teachers may receive a stipend, compensation is unavailable for their attendance. In addition to the lack of compensation for teacher PD outside of the school day, staff reported they are often too tired to attend sessions due to stressful workday experiences.

Of particular concern is the large number of new SAISD teachers who are not familiar with their core curriculum and what they need to know to inform instruction. This results in spotty implementation and typically these teachers struggle without training. There are also concerns that most training received is not focused on instruction or classroom management. There is a desire to see effective behavior intervention strategies modeled in real time with students (observers often only watch outbursts and submit written suggestions later), which interviewees shared was more evident several years ago.

Principal Autonomy

With few exceptions, such as CPI, campus level PD is principal controlled and little training is mandated across schools. Although assistant superintendents may lead PLNs at each of their principal meetings, interviewees shared that principals do not consistently share that learning with school personnel, which occurs based on each principal's value of the content. Also, principals drive the content for the seven days designated for campus-level PD, and for PLNs held during the week. For example, training on MTSS, including behavior/social-emotional support varies at the campus level. Also, although SAISD has a variety of standard protocols with embedded rubrics to guide instruction, PD for their use is voluntary. While some teachers/IAs are experienced in this area, others that are not lack access to important information. Autonomy also impacts the receipt of PD available to principals. Only six principals attended a two-day PD event developed for their benefit last summer, which was related to special education.

Finally, the team did not hear that autonomy was earned based on student outcomes. Specifically, there does not appear to be a system for pulling back autonomy in PD or other decisions when specific student groups within the school exhibit lower performance. This issue is especially relevant for 1882 schools, which is granted by TEA, and for which the SAISD superintendent has no authority regarding the hiring and firing of principals.

Always Learning Plan Related to Professional Development

As referenced above, the *Always Learning* plan referred to PD and training almost 333 times in activities and timeline descriptions. Exhibit 1f below shows a sample of this content.

Exhibit 1f. *Always Learning* Selected Content for Professional Development

II: SAISD will achieve high academic expectations for all students by ensuring highly skilled and equity-centered educators in every classroom who prepare students to pursue, persist, and flourish in a future of their choosing.

A: Create equitable, student-driven learning environments where exemplary teaching and learning practices are evident/used consistently across all classrooms in the district.

2. Create responsive professional development opportunities for Teachers that provide an evidence of accountability, active participation, and cognitive engagement for all students
6. Create common district-wide definitions of differentiation with exemplars across content areas and grade levels, including linguistically responsive instruction, accommodated instruction, accelerated instruction, and enrichment. Work with Human Capital Management to assemble a cadre of substitutes specifically for coverage for PD by August 2023.

B: Implement a comprehensive assessment program to analyze qualitative/quantitative student data on a regular and timely basis to inform classroom/program decision-making.

1. Create opportunities for Teachers to engage in professional development specific to assessment *for* learning (formative) and assessment *of* learning (summative) Embed PD opportunities at all EPIC Saturdays four times per year for 2023-2024 and 2024-2025. Conduct PD with all Principals, Assistant Principals, and academic support staff during 2023-2024 and 2024-2025

C. Support the development of skillful Teachers through providing high-quality, research-based PD that aligns to key characteristics of effective teaching and adult learning theory.

1. Provide comprehensive/differentiated PD offered in multiple modalities
3. Create instructional calendar that: ...With time for Teachers to engage in PD aligned to school/student needs. Provides time for Teachers to meet in PLNs to implement protocols for data analysis/examination of student work, evaluate curriculum for grade-level alignment, and share instructional best practices informed by data.
4. Engage all Teachers in ongoing job-embedded PD focused on culturally relevant pedagogy, content-based language instruction, high-interest resources, and authentic/adapted texts to support all students. Provide face-to-face ongoing PD for Teachers to attend during the school day by August 2023
5. Develop process to provide job-embedded PD for Teachers entering education from industry/military through coaching support from instructional specialists. Establish a New Teacher Academy specific for teachers coming from industry and military to include pedagogy, curriculum implementation, classroom management, student group training, compliance and policy and procedures training in Summer 2023.

VI. C: Partner with institutions of higher education to support the development of equity-centered Instructional Superintendents and academic program supervisors.

1. Instructional Superintendents/academic program supervisors will collaborate with nationally recognized organizations/institutions of higher education to provide PD for Principal and academic program supervisors specific to equity principles. (Emphasis added.)

The above (and other) components of *Always Learning* include laudable provisions, including ensuring a highly-skilled/equity-centered educator in every classroom (II); exemplary teaching/learning practices evident/used consistently across all classrooms (II.A); teacher PD opportunities providing evidence of accountability, active participation, and cognitive engagement for *all* students (II.A.2); assemble a **cadre of substitutes** specifically to cover PD by August 2023 (II.A.6); formative/summative PD at all EPIC Saturdays four times/year (II.B.1); skillful teacher development by providing high-quality, research based PD (II.C); comprehensive/differentiated PD **offered** in multiple modalities (II.C.1); instructional calendar with time for teachers to engage in PD aligned to school/student needs (II.C.3); and provide face-to-face PD for teachers to attend during the school day (II.C.4). (Emphasis added)

While laudable, the implementation of these provisions must overcome the overarching issues addressed above under universal access and principal autonomy. For example, although terms describe the expectation that described PD will reach every teacher, associated text does not reflect any reference to PD that is mandatory or accountability for this provision. Furthermore, without teacher compensation there is no reason to believe attendance at EPIC Saturdays will be improved. Unless a cadre of substitutes is actualized in sufficient numbers, teachers will continue to be unable to attend PD due to uncovered classes.

Activity II.C.5. calls for job-embedded PD for teachers entering education from industry/military through coaching support from instructional specialists and a new teacher academy for the teachers in Summer 2023. However, in addition to industry and the military, there also are teachers, e.g., special educators or EB teachers, new to education from fields unrelated to the military or industry. A more inclusive provision that includes new teachers from any non-education field would give them much-needed job-embedded coaching and summer institute PD.

Activity VI.C.1 relates to the collaboration of instructional superintendents/academic program supervisors with nationally recognized organizations/higher education to provide principals and academic program supervisors PD specific to equity principles. While important, additional areas of learning are important also for them to lead/support reading instruction and improve students' behavior/social-emotional wellness.

D. Campus Based Scheduling

According to the College and Career Alliance Support Network (CCASN) based at the University of California, Berkeley, master scheduling relies on a district system of support to develop the knowledge, skills, and capacity of site master schedule teams. This support requires the creation of a community of practice around scheduling and “regularly scheduled collaborative dialogue involving both district and school staff to understand and address master scheduling needs and to co-create master schedule solutions.” It also includes the documentation/sharing of effective practice, support for campuses with specific scheduling challenges, and collaborative assessment

of the master schedule process and product.³² Supportive school schedules have the following features: 1) common planning time; 2) common teaching time; 3) common time for intervention and enrichment; 4) special service personnel scheduled in tandem with general education colleagues; and 5) extended planning time provided for teams on an occasional basis.³³

According to SAISD, the instructional framework for elementary schools embeds 30 minutes for intervention to be given through small group instruction. Focus group participants reported that each SAISD school has its own master schedule that typically provides no systematic way to implement Tier 2/3 interventions that consistently supplement – rather than supplant – core instruction. The same is true for the provision of inclusive specially designed instruction. When block scheduling was initiated in 2016, PD was not provided to address increased class time, which has resulted in varying outcomes. Finally, the team did not hear that students with IEPs are consistently scheduled first to accommodate their required instructional and related service needs. As a result, personnel must adapt to schedules arranged without regard to these needs as best as they can.

As shown in Exhibit 1g, the *Always Learning* plan addresses campus scheduling in the following areas.

Exhibit 1g. *Always Learning* Selected Content for Campus Based Scheduling

- III.C.11. Acceleration. Provide structured support for students in need of accelerations, including (i) intervention blocks in elementary and (ii) Embed strategies in the Master Scheduling process Spring 2023.
- III.D.10. Math Models. This provision calls for the evaluation of middle/high school instructional minutes and schedule configurations to determine the most effective math model(s).
- III.H.6. Master Scheduling. Provide master scheduling to address access to fine arts, health/physical education, athletics, and JROTC.

The listed *Always Learning* Section III goals/activities above do not address-

- Scheduling that addresses all areas of student needs, such as intervention needs at the middle/high school levels or specially designed instruction.
- Scheduling to supplement, and not supplant, core instruction and the need to schedule students with IEPs first to accommodate their unique challenges.
- A district system of support for effective master scheduling to support teaching/learning.

³² *District System of Support for the Master Schedule Process and Product*, University of California, Berkeley, CCASN, retrieved from District System of Support for the Master Schedule Process and Product, University of California, Berkeley, College and Career Alliance Support network (CCASN, retrieved from <https://casn.berkeley.edu/master-schedule-guide/master-schedul>).

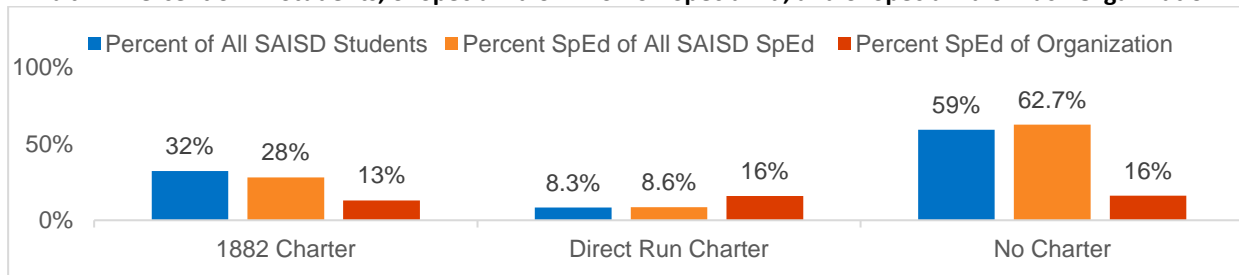
³³ M.D. Rettig, *Designing Schedules to Support Professional Learning*, Leadership Compass, retrieved from https://www.naesp.org/sites/default/files/resources/2/Leadership_Compass/2007/LC2007v5n2a1.pdf.

E. Charter Schools and Equitable Choice

SAISD has two types of charter schools, in addition to magnet choice schools. In-district charter schools are district schools that are granted increased autonomy in return for greater accountability for student achievement. Senate Bill (SB) 1882 allows charter schools to partner with mission-aligned nonprofit organizations and receive additional state funding for resources. As noted above the Bill allows for total autonomy from the district, including any ability for the superintendent to hire and evaluate principals. Charter schools and SAISD’s movement to school choice for all students comprise the last overall theme that contributes to SAISD’s system of schools’ impact on teaching/learning.

Chartered schools comprise about 40 percent of all SAISD campuses. Of all charter schools, 86 percent are chartered through Senate Bill 1882. Exhibit 1h shows that the proportion of students in the special education group (SpEd) for each organization is comparable to their associated SAISD overall student ratio. District run charters and campuses not chartered each have a 16 percent enrollment of students with IEPs. At 13 percent, 1882 chartered schools have a significantly lower rate of SwDs.

Exhibit 1h. Percent of All Students, of Special Ed of All SAISD Special Ed, and of Special Ed of Each Organization



Furthermore, 1882 charters have a much smaller percent of SwDs who need and are educated in specialized units compared to district-run charters and non-charter schools (0.9 percent, 2.1 percent, and 17 percent, respectively).

Generally, SAISD has no oversight authority over SB 1882 chartered schools and how they distribute their budgeted funds. Instead, the district’s authority is linked to each managing charter board’s contract with SAISD. State/federal laws governing SwDs are applicable to all in-district charter campuses and these obligations may not be waived. While these laws are based in procedural compliance, the appropriate education federal rule and related case law include the requirement that SwDs make progress.

Always Learning Plan Related to Chartered Schools and Choice

The *Always Learning* goal at XII.C. pertains to chartered schools and choice. As shown in Exhibit 1i, several activities have an impact on students with IEPs.

Exhibit 1i. Always Learning Selected Content for Chartered Schools and Choice

- XI.B.1. Create districtwide environment of school choice for all schools, ensuring equitable access to all students and prioritizing neighborhood needs (May 23 open enrollment policy and implement by Aug 24)
 - 2. Ensure student stability through removing exclusionary policies/practices so that each student has the opportunity to stay in their school of enrollment.
- XI.C. Implement a best-in-class enrollment system that is fair, transparent, efficient, and promotes equitable and diverse school options.
 - 1. Create a welcoming, easy, and transparent enrollment process that is centered on the family experiences, prioritizes equity, and provides access to high-quality options for all students.
- XI.D. Develop effective support for student recruitment by district and campus staff.
- XII.C. Implement high-quality authorizing practices for in-district charter and Senate Bill 1882 partnership schools.
 - 2. Redesign 1882 partner school contracts/financial structure to provide partner schools with the autonomy intended by Texas statute, while remaining responsive to SAISD administrative and community expectations. Provide transparent budgets to partners using FY22 information by April 2023; Determine which district services are non-negotiable and which are opt-in/opt-out including the costs and tradeoffs by April 2023.
 - 3. Develop/publish detailed autonomy guidance for charters schools, with clear district processes and procedures. by May 23, 2023. Codify all legally required autonomies/autonomies agreed to between the district and partners, as well as district guardrails, into written guidance document by August 2023
 - 4. Restructure oversight of all 1882 partner schools with a new Office of Charter Schools that serves as charter authorizer and ongoing school support, allowing the district's Office of School Leadership to focus resources on traditional schools. All SAISD in-district charter schools and 1882 partners have dedicated, responsive support from the central office and clear guidelines for operating schools.

The *Always Learning* plan presents a good approach for improving accountability for 1882 partner schools through contractual means, financial structures, clear processes/procedures, and written documentation of codified agreed/required autonomies and district guardrails. Council SST recommendations pertaining to the *Always Learning* plan content contained in Exhibit 1i are provided at Recommendation 2, below.

Recommendation 1. Leverage the resources of SAISD’s school system to improve teaching/learning through MTSS.

Leverage SAISD’s system of schools to advance teaching/learning for all students (including those with disabilities) by establishing clear responsibilities/lines of accountability; improving communication pathways and collaboration between central office staff and campus personnel (including those at charter schools); and expecting core curriculum implementation, interventions and supports for students struggling with academics and behavior challenges. This activity requires meaningful access to high quality professional development and intentional class scheduling. In addition, as SAISD moves to develop more school choice, equitable options for students with disabilities and other vulnerable student populations must be considered proactively to avoid unanticipated negative consequences. This issue is addressed below in Recommendation 2. It is important to note, however, that the level of autonomy afforded to 1882 partners makes this recommendation, and several others, difficult to implement in practice. Further consideration should be given to having a system of schools where some

recommendations are considered and others are not poses challenges in holding the district accountable for results. Alternatives or changes to this model should be considered. We note this in relevant portions of this report.

As an evidence-based framework, all areas of academic and behavior/social-emotional support for learning fit under the umbrella of MTSS. Core instruction and increasingly intense interventions need to be identified with data and root cause analysis and should be monitored and adjusted regularly to promote student success. SAISD has comprehensive written MTSS guidance, but campus practices need to better align consistently with district expectations. The district MTSS team should review, and update written guidance periodically. Improved practices are essential to increase the trajectory of student academic and social-emotional outcomes and ensure special education evaluations are not initiated because students lack sufficient support in the classroom.

The *Always Learning* plan mentioned MTSS only once (I.A.1) in association with the use of thriving student profiles to determine multi-tiered systems of support. We recognize that the Plan is organized by components aligned with Board goals but there are numerous mentions of academic, behavior, and SEL. We suggest that these and other relevant sections be consolidated into an MTSS component, taking into consideration the recommendations below that apply to 1882 charter schools as well.

- a. **Leadership Teams.** Establish leadership teams at the district, regional, and campus levels to oversee MTSS implementation. Establish clear roles and responsibilities for teams at each level.
 - **SAISD and 1882 Charter MTSS Leadership Teams.** For both entities, identify representative sample of individuals representing central office units directly and indirectly supporting equitable literacy (and other academic areas as desired) and positive behavior and social-emotional supports. Include personnel with roles related to the improvement of teaching/learning for all students, including students with disabilities, emergent bilingual (EB) students, and EBs with disabilities. Have the deputy superintendent oversee this collaborative action.
 - Identify and broadly recognize the individual responsible for leading MTSS, have that person report directly to the deputy superintendent to reach all areas of learning, and include this information on the SAISD organizational chart.
 - **Regional MTSS Leadership Team.** Have each instructional superintendent establish an MTSS leadership team composed of representative team members, principals, and other school-based personnel with roles like those for the SAISD MTSS leadership team.
 - **Campus-based Leadership Teams.** Expect each principal to lead an MTSS leadership team composed of individuals collectively representing the needs of students throughout the campus and include a parent/family representative for broad discussions not addressing individual students. By considering all human resources available to each campus, have

teams leverage their reach through collaborative rather than isolated practices.

b. Written Expectations. Ensure that SAISD’s MTSS Handbook clearly describes the expectations, procedures, and practices for successful implementation of the program, and how the implementation will be monitored throughout the year. 1882 charters should adhere to these same expectations unless they become independent charters. Expectations should include the following practices –

- High quality Tier 1 academic instruction based on core grade level curriculum, as well as social and emotional-behavioral support.
- Universal design for learning (UDL).³⁴
- Consistent use of Branching Minds.
- Tier 2/Tier 3 intensive interventions that supplement (not supplant) core instruction.
- Interventions scheduled at all grade levels to allow for core instruction in regular classes.
- A system for master scheduling to support interventions that supplement core instruction.³⁵
- A system to ensure specially designed instruction and related services are scheduled first to avoid conflicts.

b. Map Resources, Analyze Data, and Fill Gaps. Consider the following –

- **Analyze Curricular Materials, Intervention Quality, and Implementation Gaps.** Under the SAISD leadership team’s direction, in SY 2023-24 identify current materials for core curricular materials and targeted/intensive interventions for literacy. In particular, closely review resources used to accelerate learning for various groups of students with dyslexia and associated data showing effectiveness. Compare these to other products on the marketplace, including technology tools such as text to speech.³⁶ (See also Exhibit 1d’s *Always Learning* plan content and associated comments addressing dyslexia materials and human resources.) Also, review resources used in other areas such as math and social-emotional learning.
- **Fill Gaps.** By the beginning of SY 2024-25, address material resource gaps with phased-in purchasing. Use a formula-based FTE allocation of personnel to schools based on student need for various purposes, such as tiered reading intervention (including rules-based reading), and positive behavior and social-emotional support. Base this formula on such

³⁴ Retrieved from <https://udlguidelines.cast.org/>.

³⁵ District System of Support for the Master Schedule Process and Product, University of California, Berkeley, CCASN, retrieved from District System of Support for the Master Schedule Process and Product, University of California, Berkeley, College, and Career Alliance Support network (CCASN, retrieved from <https://casn.berkeley.edu/master-schedule-guide/master-schedule>) and M.D. Rettig, Designing Schedules to Support Professional Learning, Leadership Compass, retrieved from https://www.naesp.org/sites/default/files/resources/2/Leadership_Compass/2007/LC2007v5n2a1.pdf.

³⁶ See, for example, <https://www.readspeaker.com/blog/universal-design-for-learning/>.

student characteristics as low performance, economic disadvantage, EB students, students with disabilities, EBs with IEPs, etc. Use representatives of the central, regional, and campus-based leadership teams to give upfront feedback to the formula ingredients and review successive drafts. During the formula development phase, apply it to representative schools for results, and share them with leadership team representatives.

- **Limit Core Curricular Material for Reading and Math.** To ensure a balance between autonomy and maintaining consistent and high-quality curricular standards across the district., offer a menu of up to three approved programs for schools to choose from. Schools could receive a waiver to select an alternative program as long as it meets or exceeds the rigor of the approved menu.
- **Braided Funding.** Use proportionate (or braided) funding as a tool to blend funding sources to reduce personnel fragmentation.³⁷
- **School-based Community Health Clinics.** Aggressively research community-based health organizations and reach out to explore their willingness to partner with SAISD to provide school-based clinics and physical and mental health services. See, for example, the 30-year experience of the Chicago Public Schools in this area and related website.³⁸ Dallas ISD provides similar services as well.³⁹

c. Human Resources. Consider the following –

- **Gap Analysis.** Compare student support needs and the personnel currently available to provide academic, positive behavior, or social-emotional interventions and support. Use data associated with caseloads and other information for this gap analysis. Use this information to identify physical resources needed to meet expectations for effective MTSS implementation. Establish a reasonably aggressive time frame and activities to have sufficiently knowledgeable staff support school and student needs.
- **Behavior/Social-Emotional Support.** Identify all personnel in central office departments available to support teachers and their students having severe behavioral challenges without regard to their disability status. Centralize these personnel in one unit to decrease the number of schools necessary for each staff member to support. Because more students with these characteristics have IEPs, consider housing these staff members in disability services. Review the UCLA paper, *“Transitioning from Psychiatric Hospitalization to Schools”* for strategies to address this difficult transition issue.⁴⁰ Deploy these support staff to schools to support and model behavioral interventions for teachers and to work directly with students to mitigate challenging behavior.
- **Electronic Directories.** Develop a user-friendly electronic process to collect and expedite

³⁷ Leveraging Resources: Blending and Braiding Funds, retrieved from <https://www.isbe.net/Documents/Blending-and-Braiding-061121.pdf>.

³⁸ Retrieved from <https://www.cps.edu/services-and-supports/health-and-wellness/student-health-services/>.

³⁹ Retrieved from <https://www.dallasisd.org/Page/952>.

⁴⁰ Retrieved from <https://smhp.psych.ucla.edu/pdfdocs/hospital.pdf>.

(same day) responses to principals identifying an urgent need for personnel to assist a teacher with a student having significant behavioral challenges after local resources are exhausted. Also, have an electronic list of community-based resources available to campuses for student and family support.

d. Professional Learning. Consider the following –

- **Training Curriculum.** Review SAISD’s training curriculum and identify essential content for various groups of personnel. Connect training to SAISD’s MTSS framework and written expectations are aligned. Consider adding activities that reflect areas of mandated training for various personnel groups to the *Always Learning* plan (or the implementation plan). Clarify that principal autonomy may reflect individualized approaches to training but cannot exclude those identified as essential for instruction for all or groups of students. Annually, review and revise the curriculum and training mandates.
- **Training Barriers.** Review the barriers (e.g., after school or Saturday PD challenges) the Council SST identified in its report. Include in the *Always Learning* plan one or more activities designed to address and remove these barriers so that training is delivered as expected. Consider revising the start of the school day or the daily schedule to include common planning time for teacher Professional Learning Communities (PLCs). Continue to set aside formal time during the PLCs for districtwide training on specific topics (e.g., mathematics or reading content, MTSS).
- **Central/Regional Support to Campuses.** To understand and address the extent to which 1882, central/regional personnel and leadership teams are effectively supporting campuses, once or twice each year bring principals and other representative personnel together to discuss the effectiveness of training and other campus-based assistance to identify areas for improvement. Monitor these areas and implement targeted improvement as needed.
- **Training Elements.** Have professional learning include the following elements—
 - Cross-Functional Teams. Cross-train individuals from different central office departments to ensure a common language and understanding of MTSS is applied across the district and with schools.
 - Differentiated Learning. Ensure professional learning is differentiated according to audience skills, experiences, and needs.
 - Multiple Formats. Use multiple formats (e.g., in-person, videos, webinars, and narrative text) to maximize the reach of training.
 - Coaching/Modeling. Accelerate the use of coaching and modeling to support teachers and other personnel needing assistance, e.g., strategies for reducing/eliminating escalations of students’ aggressive behavior.
- **School Walk Throughs.** Modify existing walk-through templates for SASSED and 1882 charter schools to embed critical MTSS elements. Use an electronic platform to quickly

capture and summarize information from classroom visits to identify areas of need for follow-up assistance.

- **Exemplary Implementation Models.** Collect and share through multiple virtual and in-person forums best practices seen in SAISD schools, lessons learned, victories, and challenges in implementing MTSS for all students. Encourage and facilitate staff visits to exemplary schools and establish time for that to happen. Also, share broadly strategies used by these schools.
- e. **Data Analysis and Reports.** Develop user-friendly summary reports for the SAISD leadership team showing data, such as those produced through KPIs referenced in 1g below. Design user-friendly reporting formats for the KPIs and disseminate results on a regular basis to the campus-regional-district leadership teams and the board of trustees.
- f. **Data Driven Monitoring and Shared Accountability.** Consider the following –
- **Key Performance Indicators (KPIs).** Review KPIs to ensure they are disaggregated by student groups that include disability and disability/EB. Sort disability data by educational environment and EB data by level of proficiency. If such data is too small to publish, keep it confidential but make it available to central, regional, and school leaders and disability services personnel. Report and progress monitor this data by these student groups to facilitate school-based problem-solving and informed decision-making. Ensure instructional superintendents, principals, and all personnel who support schools with MTSS implementation have access to data/reports. Determine school autonomy based on the performance of these students and other traditionally marginalized students in each building.
 - **Instructional Superintendent Data Checks.** At least twice each year have instructional superintendents discuss data with their group of principals on prioritized KPIs to identify outcome patterns, anomalies, support needed, and follow-up activities. Establish a protocol for these conversations to ensure student groups with significant achievement and/or behavior and social-emotional needs are addressed. At each of these meetings, include central office support personnel who collaborate with the instructional superintendents and their sets of schools to help address follow up action. This recommendation applies also to 1882 partners.
 - **Data Base for Orton-Gillingham Trained Teachers.** Establish a database of teachers trained, and who need training, to guide decisions about available resources and future professional learning needs. Differentiate training based on individual teacher training and experience.
 - **Monitor Implementation Expectations.** Monitor implementation of practices that SAISD expects, such as for MTSS (and UDL), literacy, use of district-recommended materials, content training, etc. Enforcing such expectations will allow SAISD to level set across buildings in the district to improve outcomes for all students.
- g. **Broad Communication and Feedback.** Have the SAISD MTSS leadership team design protocols

for feedback loops involving central, regional, and school personnel, parents, and the community to learn about barriers and act on issues that cannot be resolved without its attention. Also, using SEPAC and campus-based guidance and feedback enhance the disability services webpage to increase information for all stakeholders. Include, e.g., function-based disability services personnel with emails, handbooks, guidance documents, and SAISD/publicly available resources, etc.

- h. SAISD Implementation Plan and Campus-Based Planning.** Embed in SAISD’s implementation plan the areas described above and others as appropriate and identify activities required for campus-based improvement planning. As part of this process, review the *Always Learning* plan to identify any areas, in addition to those noted above, that need expansion or clarification. Consider the document an evolving blueprint for continuous improvement and schedule updates on a regular basis based on data analysis and listening sessions with key community and district stakeholders (e.g., six-month intervals).

Recommendation 2. Ensure SAISD’s parameters for/implementation of school choice has equitable outcomes for all student groups.

Ensure SAISD’s move to become a system based on school choice is meaningfully accessible to all students, including those with disabilities, and that, once enrolled, students receive the instruction and support they need to be successful. Consider clarifying the following *Always Learning* plan components and relevant goals and activities.

- a. MTSS Leadership Team.** Have representatives of the MTSS Leadership Team referenced in Recommendation 1a engage in the activities below.
- b. Districtwide School Choice and Enrollment (XI.B.1/2 and C.1).** As SAISD plans for its move to school choice for all schools, personnel need to consider and document what equitable access means for students with IEPs, particularly for those with low incidence disabilities, such as students with vision/hearing impairments, physical disabilities, and those enrolled in such specialized programs as ALE and BSC. For example, will choice for students be limited to campuses offering ALE and/or BSC or will other choices be in place? Will classes for these students be available only in poorly performing campuses with space available? If currently in poorly performing campuses, will their choice options change? Will the removal of exclusionary policies or practices enable these students to remain in their school of enrollment? The answers to these and other questions need to be fully considered and explained to parents/students to ensure a fair, transparent, and equitable enrollment processes. SAISD should proactively consider the findings of a Council SST review in another full choice district where low performing schools enrolled disproportionately higher rates of students with IEPs because students and families missed choice selection deadlines and only the least desirable campuses remained with available space.
- c. Student Recruitment (XI.B.D).** In addition to effective support for student recruitment by district/campus staff, it is important for all campus websites, including 1882 charters, to describe in writing and photographs ways in which they welcome students with IEPs and their

provision of specially designed instruction/related services that meet student needs.

- d. **1882 Contracts/Financial Structure and Autonomy (XII.C. 2 and 3).** Ensure that MTSS instructional supports essential for all students and more specialized supports for students with IEPs are not negotiable. Make it clear that students with IEPs are not only entitled to access 1882 partner schools but to receive an appropriate education that results in educational progress. This requires 1882 charters to be prepared and agree to educate students with more significant disabilities who require more intensive instruction and support. In addition, contracts should clarify the charter’s responsibility for developing and providing specialized programs, such as BAC and ALE, and having facilities that are accessible to individuals with limited physical mobility. The financial structure should clarify cost responsibilities for IEPs requiring high costs services, and for legal costs associated with the resolution of complaints, due process hearings, and court litigation.
- e. **Office of Charter Schools (XII.C.4).** Ensure that charter office and disability services personnel collaborate closely to guarantee special education requirements are considered during the charter (re)authorizing process and ongoing school support. Also, expect collaborative monitoring to identify any charter-based activities that do not comply with codified autonomies and guardrails or noncompliance with federal or state regulations.

II. SPECIAL EDUCATION ELIGIBILITY

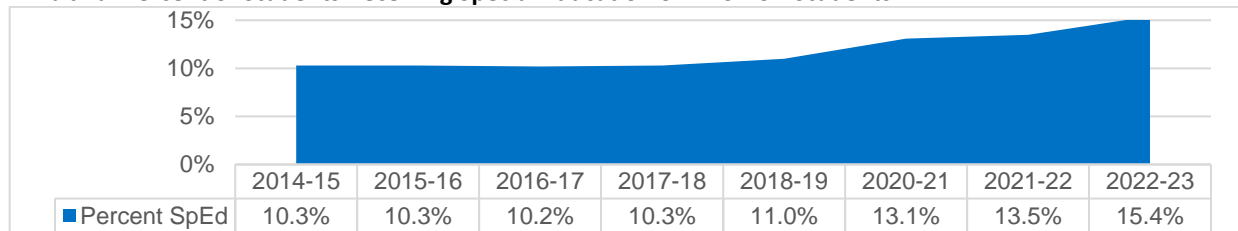
The following information pertains to SAISD practices for referral, assessment, and special education eligibility. For various reasons these have increased in the district over the last few years. Compared to the 2021-22 fiscal year, the number of completed evaluations with special education eligibility determinations as of February 23, 2023, has already increased by 30.5 percent, from 462 to 603.⁴¹

This year there are 10 FTE and 4 intern vacancies for assessment personnel, compared to the 2021-22 school year with 2 FTE and 1 intern vacancies. The 14 FTE speech and language pathologist vacancies have also stretched staff time. As a result, as with other districts nationwide, caseloads have increased, and other staff have stepped up to support the work of the special education team.

A. Growth of Special Education and Variations by School-Type

As shown in Exhibit 2a, the percentage of all SAISD students receiving special education (SpEd) from 2015-16 to 2022-23 (as of February 2023) has grown by almost 50 percent (10.3 percent to 15.4 percent). Rates began to increase in 2018-19 from 10.3 percent to 11.0 percent; post-Covid in 2020-21 they increased to 13.1 percent; and in 2022-23 they increased to 15.4 percent. The 2018-19 increase coincides with the January 2018 federal findings against TEA for incentivizing low eligibility rates to avoid state monitoring.

Exhibit 2a. Percent of Students Receiving Special Education of All SAISD Students⁴²



Interviewees explained that this growth was due to various reasons in addition to the above-referenced findings against TEA. These may include 1) the continuing impact of Covid and the time students were away from in-person education; 2) the uneven implementation of MTSS and interventions supplanting core instruction; and 3) as discussed below, changes in TEA’s requirement that dyslexia evaluations be conducted exclusively under IDEA. Interviewees also expressed a growing concern that special education is being used to compensate for a lack of appropriate general education instruction (including supplemental, intensive, and targeted interventions) for too many students.

⁴¹ These figures do not reflect initial evaluations for speech/only services.

⁴² The exhibit does not include rates for 2019-20 when schools closed due to Covid. SAISD data is from the TEA Special Education Reports.

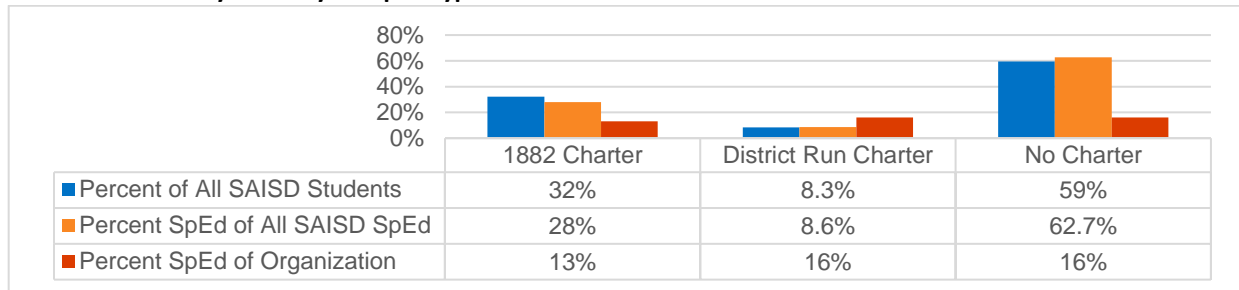
Students with IEPs by Campus Type

As shown in Exhibit 2b, campus disability rates vary by charter type and traditional school.

- **1882 Charters.** Enrolling 32 percent of all SAISD students, 1882 charters educate 28 percent of all students with IEPs.
- **Direct Run Charters.** Enrolling 8.3 percent of all SAISD students, direct run charters educate a comparable 8.6 percent of all students with IEPs.
- **Traditional.** Enrolling 59 percent of all SAISD students, campuses not chartered educate 62.7 percent of all SAISD students with IEPs.

When considering the composition of students with IEPs of each organization, district run charters and traditional campuses each have a proportion of 16 percent compared to 1882 charter’s lower rate of 13 percent.

Exhibit 2b. Disability Rates by Campus Type



Each organization has campuses with IEP rates that vary significantly.

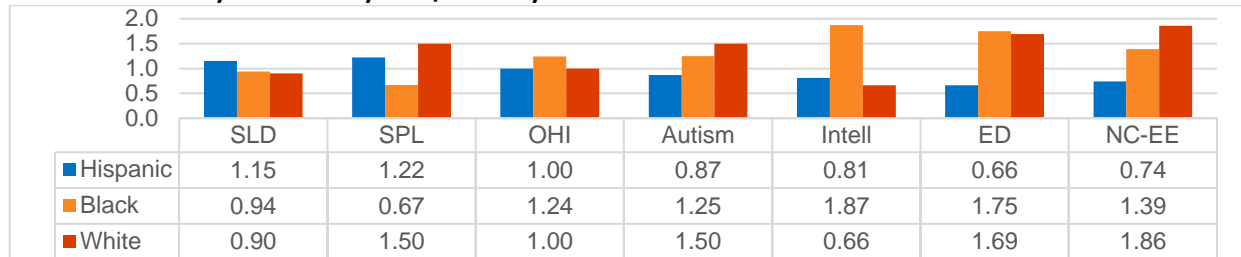
- **Traditional.** Traditional campuses without charters have IEP rates ranging from 3.2 percent to 29.3 percent. Four campuses have rates that are under 10 percent, 15 have rates between 10 and 14 percent, twenty-six have rates between 15 percent and 19 percent, ten have rates between 20 percent and 24 percent, and three have rates between 25 and 29 percent.
- **1882 Charters.** These charters have IEP rates ranging from 1.2 percent to 23.5 percent. Nine campuses have rates that are under 10 percent, nine have rates between 10 and 14 percent, nine have rates between 15 percent and 19 percent, and three have rates between 20 percent and 24 percent.
- **District Run Charters.** These charters have IEP rates ranging from 11.3 percent to 25.4 percent. Five charters have rates between 10 and 14 percent, four have rates between 15 percent and 19 percent, and one rate is 25.4 percent.

Consideration of Race/Ethnicity

Using a risk ratio, which measures the likelihood that students from a racial/ethnic group is more likely than all other groups to be identified as having a particular disability, no student group

approaches a risk ratio of “2,” which would be cause for concern. Eligibility decisions show no significant disproportionality, for which SAISD is to be commended. (See Exhibit 2c.)

Exhibit 2c. Disability Risk Ratio by Race/Ethnicity



B. Increase in Students with Specific Learning Disability

For several reasons, SAISD students identified as needing special education based on a diagnosis of specific learning disability (SLD) has grown faster than any other disability area. The information below addresses the factors that have influenced this increase.

TEA’s Single IDEA Pathway Requirement for Dyslexia Evaluations

Since September 2021, TEA’s *Updates to Dyslexia Handbook: Procedures Concerning Dyslexia and Related Disorders (Dyslexia Handbook Updates)*⁴³ has required school districts to use IDEA’s evaluation process as the single pathway to evaluate (with parent/guardian consent) every student suspected as having dyslexia/dysgraphia and needing associated intervention services. This requirement stands regardless of school personnel or parents’ lack of suspicion of a student’s need for special education to meet the student’s needs. TEA does not require an IDEA evaluation to be used as the single pathway for any other area of disability unaccompanied by a suspicion of special education need that can be addressed under Section 504. TEA’s dyslexia/dysgraphia requirement exceeds IDEA’s provision for the identification and evaluation of children and youth believed to need special education and related services. (34 C.F.R. §300.111) In the Council SST’s experience, no other states categorically require an IDEA evaluation single pathway for dyslexia/dysgraphia.

The requirement for an IDEA evaluation does not apply automatically to students currently receiving standard protocol dyslexia instruction under a Section 504 plan. In an updated October 2022 question and answer document, TEA explained that it is permissible to continue with such instruction without conducting an IDEA evaluation when the student is making adequate progress (i.e., data from progress monitoring demonstrating consistent movement towards closing achievement gaps) and the parent/guardian agrees with the current supports and services.⁴⁴ Furthermore, TEA explains that if the ARD committee finds a student evaluated under

⁴³ Retrieved from <https://tea.texas.gov/about-tea/news-and-multimedia/correspondence/taa-letters/updates-to-dyslexia-handbook-procedures-concerning-dyslexia-and-related-disorders-dyslexia-handbook>.

⁴⁴ Question 12, retrieved from <https://tea.texas.gov/sites/default/files/dyslexia-handbook-appendix-updated-questions.pdf>.

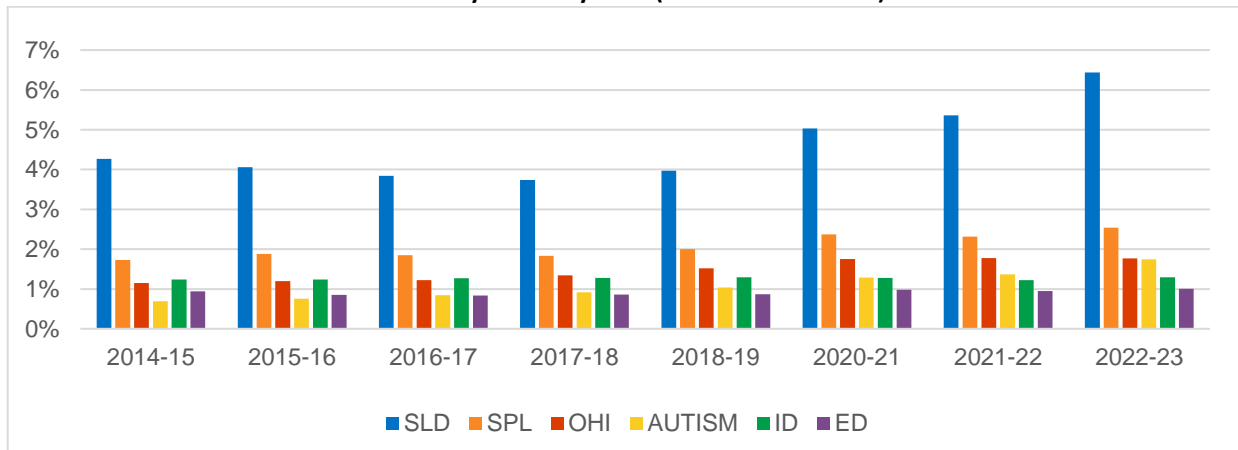
IDEA has dyslexia/dysgraphia but does not need special education services, only then the student may receive appropriate tiered interventions, including the standard dyslexia instruction protocol under a 504 plan (with parental consent).⁴⁵

It is not clear why TEA is prohibiting students suspected of having dyslexia/dysgraphia for whom school personnel and parents believe do not need special education must, nevertheless, be evaluated only under IDEA and not 504. Interviewees reported that it would be appropriate for these students to have a reasonable period of time to consider their progress using the standard dyslexia protocol that would be the same under 504.

SLD Growth as Percentage of All SAISD Students

The percentage of all SAISD students identified as having SLD was relatively steady from 2014-15 to 2018-19 when the rates were about 4.0 percent (plus or minus .3 percentage points). (See Exhibit 2d.) The rate began to grow in 2020-21 (5.0 percent, post TEA findings), continued to increase in 2021-22 (5.4 percent, post TEA single dyslexia pathway) and increased again in 2022-23 (6.4 percent). The rates for several other disability areas also grew, but their smaller number and rates have had less of an impact. From 2014-15 to 2022-23 only autism grew as much as one percentage point (0.7 percent to 1.7 percent).

Exhibit 2d. Percent of All SAISD Students by Disability Area (2014-15 to 2022-23)



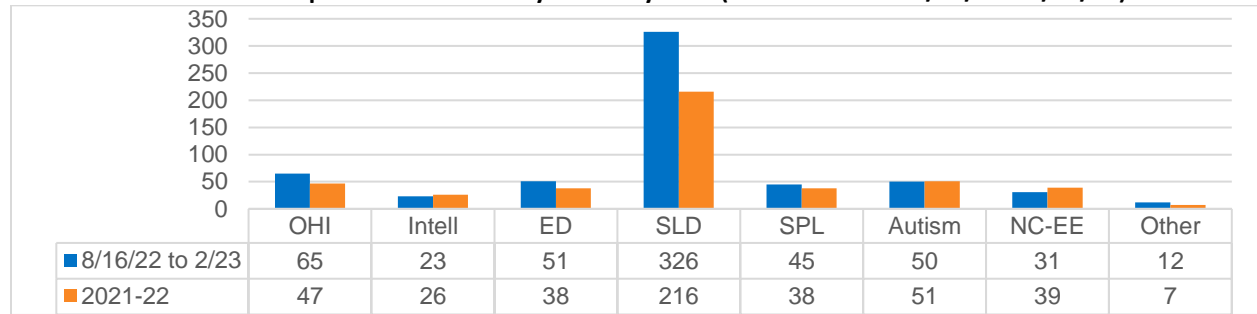
SLD Eligibility Growth Based on Completed Evaluations

In particular, between 2021-22 and 8/16/22 to 2/23/23 the number of students with SLD increased by 34 percent (216 to 326 students). Also, eligibility rates based on all completed evaluations increased from 89 percent to 93 percent. Using an approximate 90 percent disability rate applied to the 451 pending evaluations, eligibility is likely to increase to about 1,117 students for the school year (an increase of 59 percent), and the SLD rate is likely to increase significantly

⁴⁵ Question 15, *Ibid.*

as well. It is noteworthy that other districts with reviews conducted by the Council SST had completed evaluation eligibility rates that were closer to 80 percent.

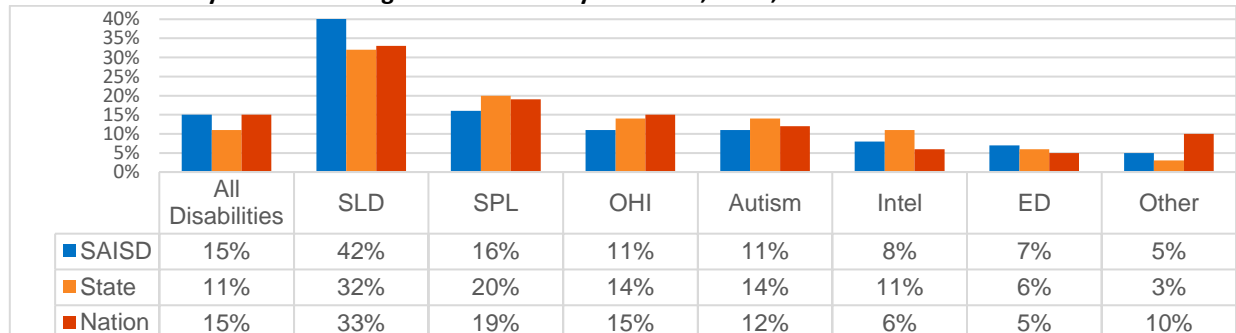
Exhibit 2e. Number of Completed Evaluations by Disability Area (20221-2022 and 8/16/22 – 2/23/23)



SAISD Compared to State/Nation as Percentage of Students with IEPs

Another indicator of SAISD’s SLD growth is its 42 percent composition of all students with IEPs, which is significantly higher than state and national rates (32 percent and 33 percent, respectively.)⁴⁶ Overall, the district’s 15 percent disability rate is the same as the nation’s but higher than the state rate of 11 percent.

Exhibit 2f. Disability Area Percentages of All Disability for SAISD, State, and Nation

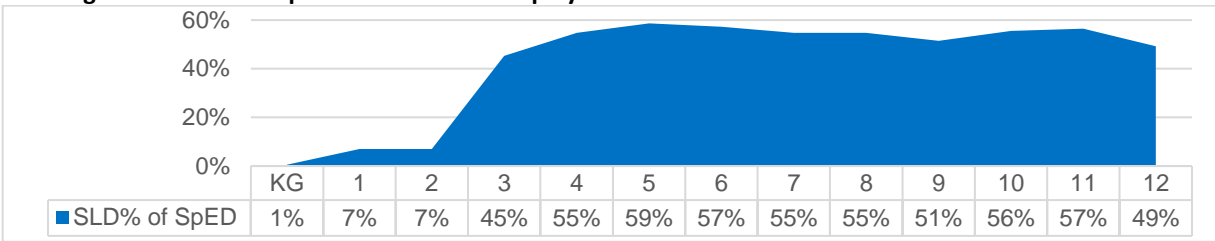


SLD Increase by Grade

When considering the extent to which students with SLD are a portion of the special education group by grade, rates jump at third grade (from 7 percent to 45 percent.) The rate continues to increase at fourth and fifth grades (55 percent and 59 percent, respectively). Rates thereafter range from 51 percent (ninth grade) to 57 percent (sixth and eleventh grade). Twelfth grade posts the lowest high school rate of 49 percent, perhaps due to students who dropped out of school. One possible cause for the third-grade increase may be that 2021-22 was the first year the state assessment resumed after it was paused for two years due to the pandemic.

⁴⁶ Source for state and national data: 2020-21 Part B Child Count Published by national center for Educational Statistics, retrieved from <https://nces.ed.gov/programs/coe/indicator/cgg>,

Exhibit 2g. Percent SLD of Special Education Group by Grade



SAISD SLD Decision-Making

After an evaluation for dyslexia is completed, the ARD committee meets to determine if the student meets SLD (or another disability) criteria and if so, needs special education and related services. The ARD is prohibited from making this determination if a contributing factor is due to the student’s lack of appropriate instruction in reading, lack of appropriate instruction in math, or limited English proficiency. (34 C.F.R. §300.306) If the ARD committee finds that the student has dyslexia but does not need special education and related services, a discussion would focus on the development of a Section 504 plan that could include the provision of the standard protocol for dyslexia instruction and additional accommodations for the student. (Note: with appropriate prior notice to the parent, the ARD committee could transition to 504 within the same meeting.)

Neither the TEA nor SAISD appears to have a protocol to help committees decide if a student identified with SLD/dyslexia needs specially designed instruction (SDI)⁴⁷ and related services or the student’s needs can be addressed through 504 with the dyslexia standard instructional protocol. Interviewees agreed that guidance is needed to distinguish between student needs requiring the dyslexia protocol to be taught through SDI (IDEA) or general education (504) when both paths require an individual with the same expertise to deliver instruction.

No IDEA disability area reflects, like SLD, the intrinsic connection between prior reading instruction and eligibility. As shown in Exhibit 2g above, the number and percentage of students with IEPs identified as having SLD in grade 2 was 118 students (7 percent) and in grade 3 was 270 students (45 percent). It is likely that these students were reading below kindergarten or first-grade standards. This alarming increase reinforces the critical need for collective action to deliver high quality reading instruction and supplementary targeted and intensive interventions designed to increase the trajectory of achievement for all students, including those with dyslexia, especially beginning at the early childhood and early elementary grade level.

It was also shared that ARD participants may not always know how instruction is delivered within special education. For example, SAISD’s [MTSS Manual](#) includes an Intervention Matrix that lists dyslexia interventions appropriate for either general education or special education: Really Great Reading (grades K-5), Voyager’s Language Level Live! (grades 6-8), and Lexia’s PowerUp (grades

⁴⁷ The IDEA at § 300.39 defines special education as specially designed instruction, at no cost to the parents, to meet the unique needs of a child with a disability.

9-12). Although not listed in the MTSS Manual, IMSE for grades K-5 is also used within general and special education. The minutes of instruction at the Tier 3 level are listed as the same for both instructional groupings.

SAISD's [identification](#) guidance for *Dyslexia and Dysgraphia Evaluation & Provision of Services* addresses the need for the ARD committee to assess if a student needs general or SDI to provide appropriate instruction. The guidance, however, does not offer any distinguishing factors to guide decision-making. The district's dyslexia specialists who could be helpful in this circumstance typically do not attend ARD meetings because of their heavy workload. Interviewees opined that ARD committees have been making more SLD decisions for special education because TEA's single IDEA evaluation pathway has the ARD committee (normally involved with special education decision-making) make this determination rather than 504 teams for students not believed to need SDI. It is believed that the single IDEA evaluation pathway has produced a bias for special education (versus Section 504) decisions.

Recommendation 3. Initiate strategies to improve decision-making for dyslexia 504 and SLD eligibility.

In addition to the activities below, consider joining other school districts, the Texas Council of Administrators of Special Education (TCASE), and parent organizations to discuss TEA's single IDEA pathway for dyslexia evaluations and potential unanticipated consequences. As part of this process, consult with experts in this field about the advisability of circumventing, for dyslexia only, regular evaluation processes for students believed to have a disability. If this process results in concerns about the practice, with the broadest group possible, approach TEA representatives for follow-up conversations.

- a. **MTSS Leadership Team.** Have representatives of the MTSS leadership team (see Recommendation 1a) engage in the activities below. Specifically, include individuals knowledgeable about dyslexia/SLD and the use of related evidence-based tiered interventions and progress monitoring.
- b. **Data Review and Focused Conversations.** Collect and review data, such as the content of Exhibits 2a-f and 3t-u, to identify root causes for problematic patterns. Review this data with the superintendent, deputy superintendent, instructional superintendents, senior leadership team, and principals to address patterns as needed. Disaggregate data further, e.g., by charter type, traditional, and educational environment to better plan and target interventions and supports. Use this information to focus central, region, and school-based conversations to identify root causes and areas needing follow-up attention and support.
- c. **Written Expectations.** Consider the following –
 - **Students with Dyslexia, Generally.** For MTSS and ARD teams (as appropriate for the student) develop a tool kit to clarify 1) expected participating team members (including student's teacher); 2) instruction and evidence-based intervention documentation (with clarity of intensity and frequency) the student will (has) receive(d); 3) progress monitoring

frequency, including expected period of time for the student to show progress; 4) scheduling of follow up meetings to determine whether interventions were implemented as expected, their success, or if more intensive interventions are needed. For EB students, include the expectation for a professional with knowledge about the student's language acquisition and cultural background to be a team member. In addition, have the toolkit describe steps the principal and campus support team are expected to take if specified interventions were not provided as described. Include the documentation of expedited interventions for the student.

- **Student with Dyslexia Eligibility for Section 504 or IDEA.** Using TEA's single IDEA pathway for dyslexia evaluations, establish a protocol to support educationally justified decision-making. Clearly describe quantitative and qualitative information ARD teams need to use for determining if a student needs (or does not need) special education to receive an appropriate education. Include in the protocol a notice that use of the IDEA evaluation process does not automatically mean a student needs instruction under an IEP rather than a 504 plan. To help the team distinguish between the student's need for an IEP or 504 plan, have the protocol clearly describe, with examples, dyslexia instructional differences and other considerations to support decision-making.
 - Include all changes from current SAISD written expectations in relevant operational manuals and embed an activity in the *Always Learning* plan.
- f. **Human and Material Resources.** Identify all personnel with expertise teaching students with dyslexia or other reading challenges, regardless of their special education certification, and any gaps between need and staff availability. Cross reference current evaluation challenges with Recommendations 7, 8, and 9.
- g. **Differentiated Professional Learning.** Embed in the professional learning curriculum referenced in Recommendation 1e the content needed to give all relevant district stakeholders the training they need to fulfill expectations and expand the pool of individuals knowledgeable about teaching students with dyslexia and other reading challenges. As part of this process, have disability services and other relevant department personnel collaborate to develop and provide the training.
- h. **Data Analysis and Reports.** Develop user-friendly summary reports for the SAISD leadership team showing data like those reported in Exhibits 2a-f. If possible, report disaggregated initial special education referral and eligibility data by the school the student attended at the time of the referral to identify outlier trends and follow-up as needed.
- i. **Monitoring and Accountability.** Consider the following –
 - **Monitor Expected Referral, Assessment, and 504 Dyslexia/IDEA SLD Eligibility Outcomes and Practices.** Supplement any state required record-review compliance model, with a case study review process for evaluations that result in an SLD eligibility finding. Include non-campus personnel with knowledge of dyslexia, MTSS, and special education, and campus-based staff. Also, review a sample of completed evaluations from

other disability areas to highlight any areas of concern. Use a neutral facilitator to support this process and synthesize results to identify any campus or systemic issues. Apply lessons learned to written guidance and professional development.

- **KPIs.** Establish KPIs to measure initial referral data resulting in an eligibility decision of SLD by region, grade level, and school. Disaggregate data by such areas as language status, race/ethnicity, gender, economic disadvantage, foster care status (if available), and combinations of data. Consider how campus reports can show outcomes with student numbers fewer than 10. In addition, establish a KPI to monitor the extent to which 1882 chartered schools enroll students with disabilities at rates comparable to other SAISD schools.
- **Data Collection and Reports.** Design reporting formats for the above that are user friendly and disseminate results on a regular basis to campus-regional-district leadership and board of trustees.
- **Data Checks.** Include above data during data check sessions with district and regional leadership and principals to develop follow-up actions and track outcomes.
- **Monitor Implementation Expectations.** Explicitly state and monitor implementation of practices that SAISD expects, such as having principals monitor KPI progress. Have a process for verifying this activity.

Always Learning Plan. Consider supplementing the plan to include a goal and/or activity related to this recommendation.

- SAISD Implementation Plan and Campus-Based Planning.** Embed in SAISD's implementation plan the areas described above and others as appropriate and identify activities required for campus-based improvement planning. Have the group review the *Always Learning* plan to identify any areas needing expansion and clarification.

III. ACHIEVEMENT OF STUDENTS RECEIVING SPECIAL EDUCATION

In this section, various types of achievement data including several measured by the federally required state performance plan (SPP) are provided for students receiving special education, which is disaggregated by race/ethnicity in several areas.⁴⁸ SPP data was for 2020-21 and SAISD data is for 2021-23. The information below addresses –

- SPP indicators: outcomes for children three through five years of age and school aged students.
- STAAR and STAAR-Alt results (2021-22 TEA Reports).
- MAP reading outcomes (winter 2021-22 and 2022-23).
- AP and honors completion.
- SPP and SAISD data for graduation and drop-out rates.
- Out-of-school suspension rates.

A. Outcomes for Children 3 through 5 Years of Age and Educational Settings

One SPP indicator pertains to SwD three through five years of age. Three areas are addressed: appropriate behavior (behavior), acquisition and use of knowledge and skills (knowledge/skills), and positive social-emotional skills (social-emotional). These areas are measured by two criteria for children who: 1) substantially increased their performance upon exiting the program and 2) exited within age expected development. As shown in Exhibit 3a and 3b, overall SAISD's young SwDs had higher outcomes overall and exceeded SPP targets and state results when measuring their substantially increased performance. When considering students who exited early childhood within age expected development, SAISD outcomes were high for use of appropriate behavior, exceeding the SPP target and state rate. Outcomes were lower than state rates and targets for positive social-emotional skills and acquisition and use of knowledge and skills.

- **Substantially Increased Performance.** SAISD rates were high across all three areas. The highest rate was for positive social-emotional skills (90.6 percent), which exceeded the state target by 5.1 percentage points and the state rate by 6.8 points. For acquisition and use of knowledge and skills and use of appropriate behavior, SAISD rates were 88.5 percent and 89.5 percent, respectively. In both areas, the district exceeded SPP targets (by 4.5 and 5.5 percentage points, respectively) and state rates (by 5.1 to 5.5 points, respectively).
- **Exited Within Age Expected Development.** SAISD rates were lower for this category. Outcomes were highest for use of appropriate behavior (76 percent), exceeding the SPP target by 5 percentage points and the state rate by 4.9 points. District rates were much lower for positive social-emotional skills and for acquisition and use of knowledge and skills (58.1

⁴⁸ Unless otherwise stated, SAISD provided district data to the Council SST; A TEA report is the source for SPP data.

percent and 52.0 percent, respectively.) Both rates were below SPP targets (by 4.9 and 4 points, respectively), and below state rates (by 1.1 and 4.2 points, respectively).

Exhibit 3a. Substantially Increased Performance

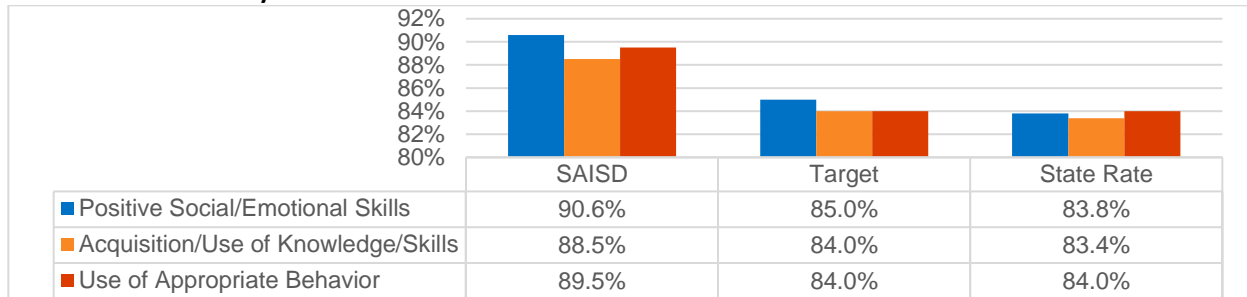
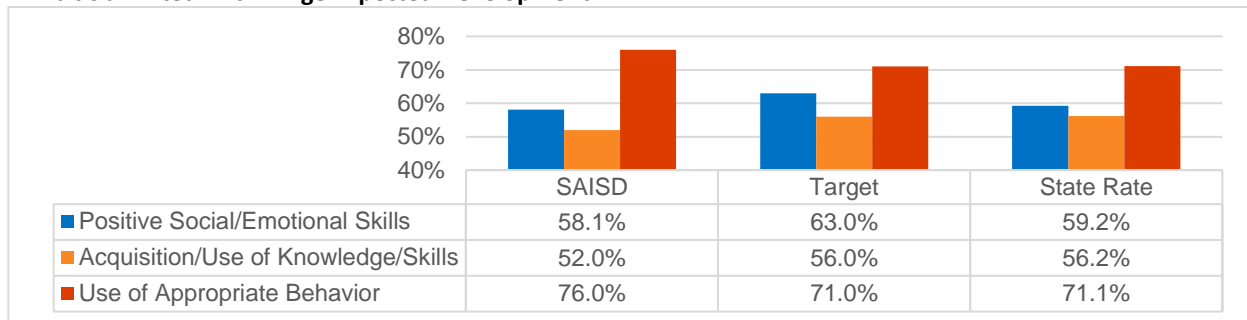


Exhibit 3b. Exited Within Age Expected Development



Another SPP indicator measures educational environments in which SwDs (ages 3 to 5) are placed. Based on the 2020-21 TEA Profile for SAISD, 30.8 percent of young SwDs received special education the majority of time inside regular early childhood programs. However, the data also showed that no children were educated in separate special education classes⁴⁹ while SAISD data reported 13.8 percent of pre-K and early childhood education (EE) children were educated in self-contained classes.

SAISD representatives shared with the Council SST various documents to show ways school personnel are supported to instruct SwDs who are educated primarily with typical peers ([Specially Designed Instruction](#) and the [Inclusion Handbook](#)). Neither document provides information for young children in PreK or EE classes and no additional information was provided for young SwDs.

The *Always Learning* plan’s third component addresses the cultivation of high academic expectations for all students, offering a rich aligned curriculum in core subjects that develop reading, writing, speaking, and critical thinking so students have “skills that help them fully realize their power to shape the world.” Objective III.B pertains to Prekindergarten/Head Start (Ages 3-4) and the provision of programs and services that support children with foundational knowledge and skills to be curious, confident, and successful learners. This objective did not include any

⁴⁹ Retrieved from <https://rptsvr1.tea.texas.gov/idea/index.html>.

content relevant to young SwDs. Interviewees reported a need to increase SAISD’s current four bilingual early childhood classrooms. This factor impacts all students, including those with disabilities who would benefit from such instruction.

B. Achievement Related Data for School-Aged Students

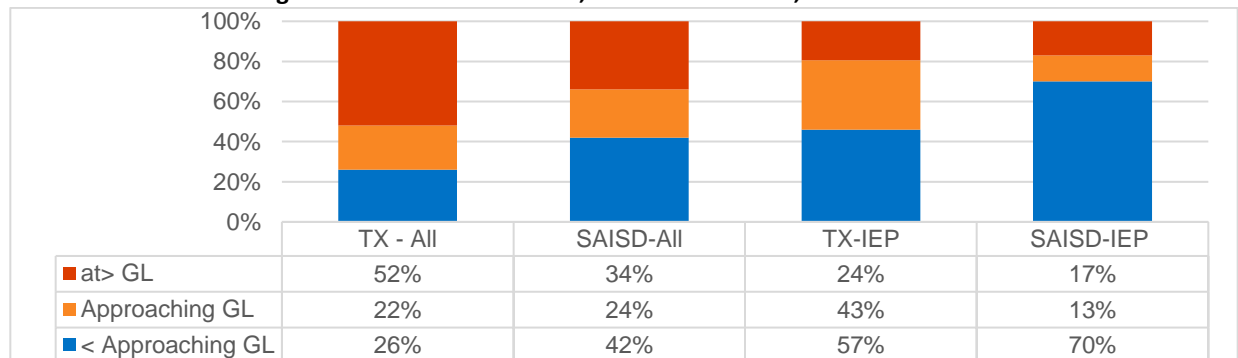
This section reports TEA’s 2021-22 data for STAAR reading outcomes for the state and SAISD, and SAISD’s SwDs. Also, SAISD reading data for all students is reported by race/ethnicity and other groups as required by the federal Every School Succeeds Act. In addition, SwD reading performance on the MAP assessment is provided. Reading achievement is highlighted given its foundation for success and the high correlation between low reading achievement and SLD growth. Finally, data is provided for graduation/dropout, suspension, and outcomes of students who had IEPs one year post high school.

STAAR Reading Rates

The following data shows reading rates for all state and SAISD students and for SAISD’s SwDs using three achievement groups: at or above grade level (GL), approaching GL, and below approaching GL. (See Exhibit 3c.)

- **At or Above GL.** Seventeen percent of district SwDs scored at/above GL, 7 percentage points below Texas SwDs. For all students, SAISD’s 34 percent rate was 18 points below the state rate.
- **Approaching GL.** Thirteen percent of district SWDs approached GL, 30 points below the state SwD average. For all students, SAISD’s 24 percent rate was 2 percentage points above the state rate.
- **Below Approaching GL.** Seven of 10 (70 percent) of district SWDs scored below approaching GL, 13 percentage points below the state SwD average. For all students, SAISD’s 42 percent was 16 percentage points above the state rate.

Exhibit 3c. STAAR Reading Rates for All Tested Texas, all SAISD Students, and SAISD Students with IEPs

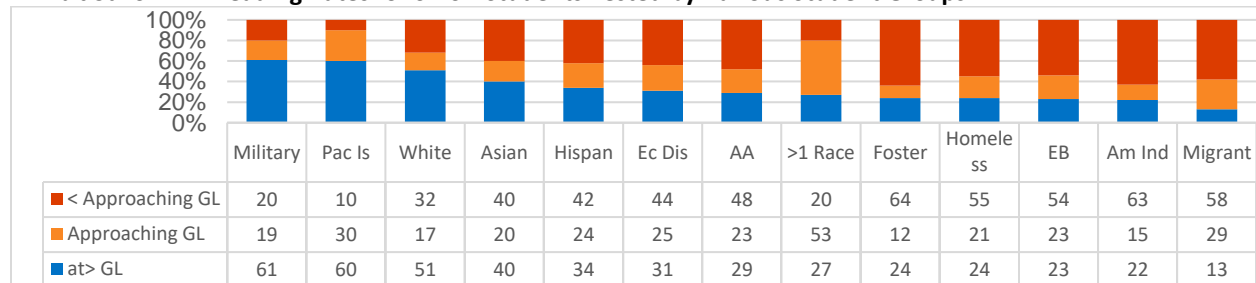


SAISD STAAR Reading Rates for Various Student Groups

As shown in Exhibit 3d, when disaggregated further by 13 student groups, SAISD’s overall reading rates vary significantly. Rates for SwDs are shown in Exhibit 3c.

- **At or Above GL.** Rates ranged from the low 60’s for military and Pacific Islander (61 and 60 percent, respectively) to 13 percent for migrant students with a rate lower than SwDs (17 percent). White and Asian students had rates of 51 and 50 percent, respectively. Four groups had rates from 24 to 22 percent [foster, homeless, emergent bilingual (EB), and American Indian].
- **Approaching GL.** Most groups had rates ranging from 17 percent to 25 percent. Groups with lower rates were American Indian (15 percent) and foster (12 percent). Groups with higher rates were more than one race (53 percent), Pacific Islander (30 percent), and migrant (29 percent). With 13 percent of students approaching GL, SwDs had the lowest rate.
- **Below Approaching GL.** Six groups had rates with more than half of their students at this achievement level: foster (64 percent), American Indian (63 percent), migrant (58 percent), homeless (55 percent), and EB (54 percent). The 70 percent rate of SwDs exceeded all rates.

Exhibit 3d. STAAR Reading Rates for SAISD Students Tested by Various Student Groups



The working draft of the special education “PIP” of December 12, 2022, included performance objectives, such as to increase the percentage of STAAR assessments meeting grade level standards at all grades and subjects.

- Objectives included no baseline data upon which to measure increases.
- Strategies did not address the need for interventions to supplement grade level instruction.
- The KPI metric/measure for 80 percent of SwDs to meet or exceed one year’s annual growth on STAAR is not sufficient to enable them to reduce their achievement gap with typical peers.

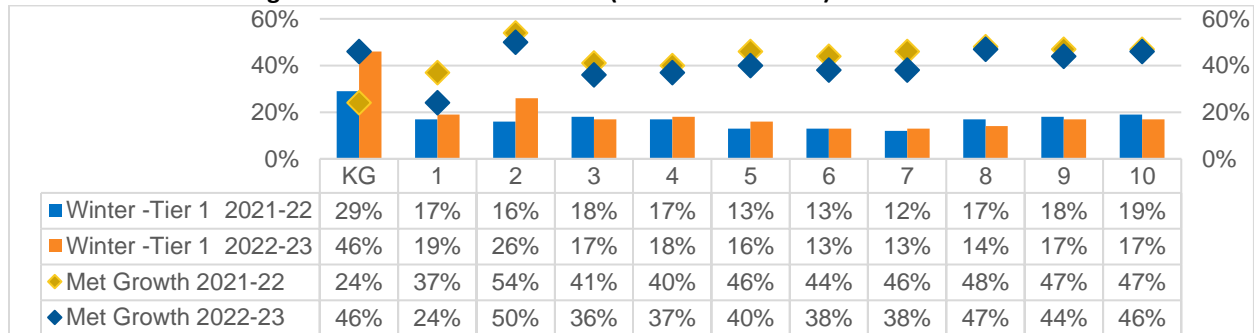
Measures of Academic Progress (MAP) for Reading

For winter 2022-23, SwDs at Tier 1 had MAP reading rates ranging from 26 to 46 percent in kindergarten and grade 2, respectively). Rates were much lower in all other grades (13 to 19 percent). Kindergarten and grade 2 also showed the greatest growth from winter 2022-23, by 17 and 10 percentage points, respectively. Four grades showed increased rates by 1 to 3 percentage

points (grades 2, 4, 5, and 7) and the remaining five grades either stayed the same (grade 6) or dropped by 1 to 3 percentage points. (See Exhibit 3e.)

In 2022-23 grade 2 had the highest rate (50 percent) for meeting growth standards. Several other grades were at 40 percent to 46 percent (grades KG, 5, 8, 9, and 10). At 24 percent, grade 1 had the lowest rate of growth. Compared to winter 2021-22, again KG had the largest gain in this category (22 percentage points). Rates for every other grade dropped with grade 1 having the largest decrease (13 percentage points), followed by grade 7 (8 percentage points). The remaining grades decreased by 6 percentage points (grades 5 and 6), 5 points (grade 3), 4 points (grade 2), or decreased by fewer points.

Exhibit 3e. MAP Reading Winter Tier 1 Rates for SwDs (2021-2 and 2022-3) and Met Growth



College, Career and Military Readiness (CCMR)

As stated in the *Always Learning* plan SAISD students with mild or moderate disabilities have been underserved. In 2018, 3 percent of these students met Texas CCMR expectations. The rate increased to 9 percent the following year, but during 2020 when schools closed for the pandemic the rate dropped to 4 percent where it remained in 2021. Accordingly, the board’s third goal seeks to increase the percentage of SwDs receiving instruction and services in the general education setting who meet the TSI College-Ready Standard in reading and math from 4 percent in August 2022 to 30 percent in August 2027. As discussed further below, this goal will not likely be met if SwDs do not receive their education based on grade level standards.

STAAR-Alt Participation

As reported by an SAISD representative to the Council SST, 10,344 district students participated in 2021-22 statewide assessments. Of these students, 564 (5 percent) participated in the STAAR-Alt. This rate is above the federally required state maximum rate of 1 percent.

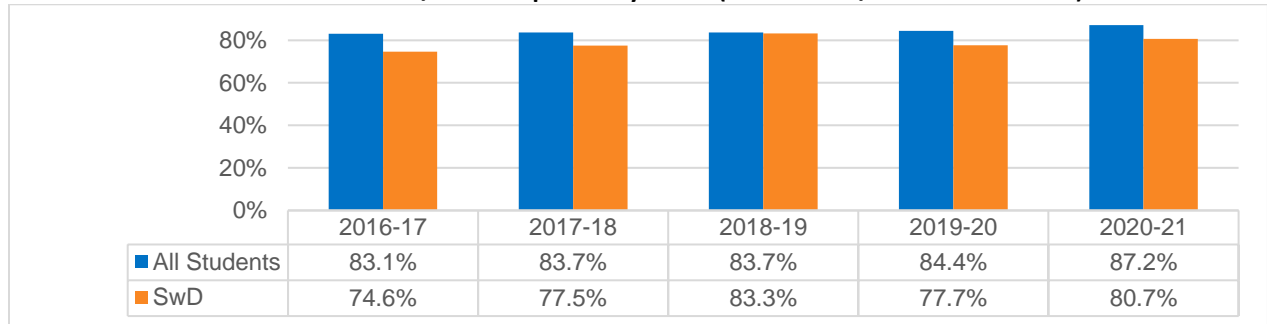
Graduation Rates

Based on SPP graduation rates for 2020-21 the district’s rate of 37.8 percent was 7 percentage points lower than the state rate. According to the TEA SPP/Annual Performance Report for

reporting on FFY 2020, these data are based on graduation requirements (19 TAC §74.11) that have no text allowing for instruction based on modified curriculum standards.⁵⁰

Data provided to the Council SST for 2016-17 to 2020-21 reflected much higher graduation rates than the SPP for the district’s SwDs. The 2020-21 SwD rate was 80.7 percent, reflecting a larger increase (by 6.1 percentage points) than the all-student increase (4.1 points). The 2020-21 all student rate (87.2 percent) was only 6.5 points higher than the SwD rate. (See Exhibit 3f.)

Exhibit 3f. Graduation Rates for State/SAISD Reported by SAISD (All Students/Students with IEPs)



Different from SPP rates, it appears that graduation data SAISD shared with the Council SST are based on TAC 89.1070, which includes specific provisions for students receiving special education.⁵¹ Here, a regular high school diploma may be awarded under the Foundation High School Program *even if one or more courses contain modified curriculum* (aligned to state standards). Also, the ARD committee may determine that required end-of-course assessments are not necessary for the student to graduate. (Also, additional requirements apply, e.g., successful completion of the IEP and at least demonstration of specific employability skills and self-help skills.)

The 2022 TEA Federal Report shows meet or above End of Course (EOC) rates for SwDs for: English I (14 percent), English II (18 percent), Algebra I (21 percent), Biology (26 percent), and SAT/ACT all subjects (13 percent). The third board goal relates to improved college readiness outcomes for SwDs. Section 3.1 establishes a 67 percent goal for juniors and seniors with disabilities to earn an advanced diploma. The second quarter status report (February 13, 2023) shows 78 percent of these students were projected to exceed this goal (based on assigned graduation type code). Differences between the low TEA 2022 EOC and high projected advanced

⁵⁰ Retrieved from [https://texreg.sos.state.tx.us/public/readtac\\$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=19&pt=2&ch=74&rl=11](https://texreg.sos.state.tx.us/public/readtac$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=19&pt=2&ch=74&rl=11). The reference to instruction based on a modified curriculum here is different from students who take an alternate state assessment based on modified academic achievement standards.

⁵¹ Retrieved from [https://texreg.sos.state.tx.us/public/readtac\\$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=19&pt=2&ch=89&rl=1070](https://texreg.sos.state.tx.us/public/readtac$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=19&pt=2&ch=89&rl=1070).

diploma rates show the marked disconnect between measures depending on their base in GL standards.

Another consequence of the use of instruction for SwDs that is based on a modified curriculum pertains to SAISD’s credit recovery program. Interviewees expressed concern that the electronic program’s content is aligned with TEKS standards. Teachers cannot modify the content sufficiently because course credit requirements are aligned to GL standards. This circumstance has made it difficult, if not impossible, for SwDs who have been receiving instruction aligned with modified standard curriculum to benefit from the credit requirement program.

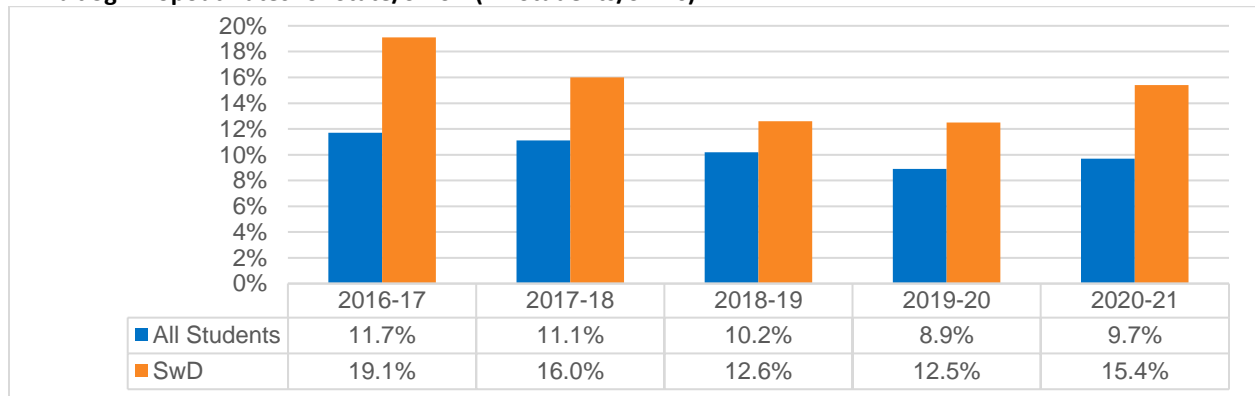
It seems that SAISD’s higher graduation rates shared with the Council SST and high percentage of students referenced in the second quarter status report for board goal 3.1 includes student achievement based on modified curriculum standards. Although such modified requirements support higher graduate rates and apparent earning of an “advanced diploma,” they do not prepare students to meet grade level standards on the STAAR or promote college-readiness as indicated by at least meeting grade level standards of end of course exams or ACT/SAT achievement. In this way, reporting student achievement based on modified requirements are likely to give students and their parents/family a false sense of achievement or prepare them for successful postschool options.

No other district or state with which the Council SST is familiar permits instruction based on a modified curriculum to earn a regular high school diploma. As recommended further below, the board and SAISD should consider this circumstance and especially for students at the elementary level establish instructional strategies to support a structured transition to instruction based on GL standards.

Dropout Rates

All students and those with IEPs had a smaller dropout rate in 2020-21 compared to 2016-17. The SwD rate decreased more than the all-student rate (3.7 percentage points compared to 2.0 percentage points). However, in 2020-21 the 15.4 percentage rate for SwDs was 5.7 percentage points higher than the all-student rate. (See Exhibit 3g.)

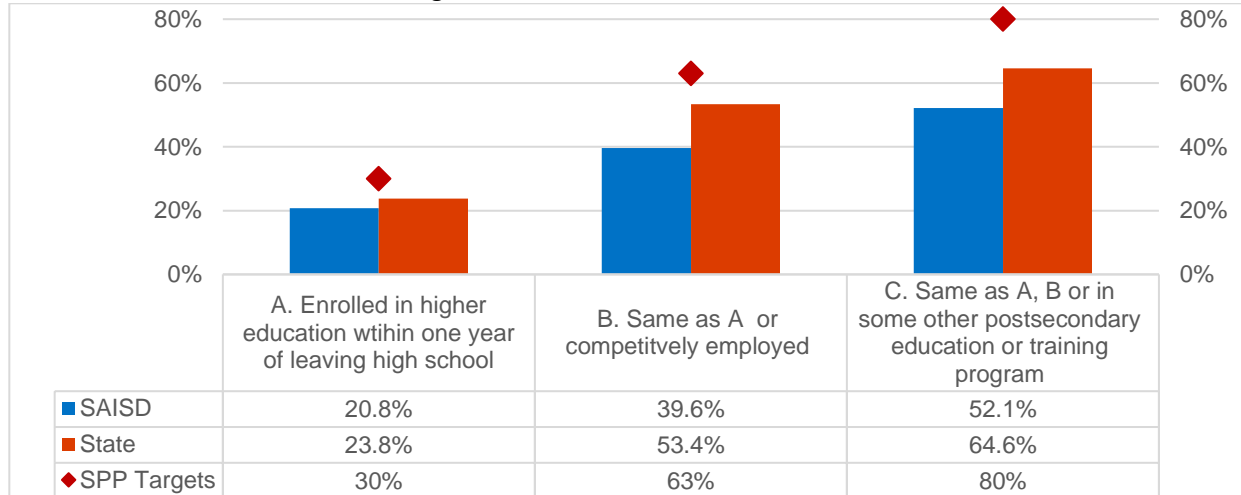
Exhibit 3g. Dropout Rates for State/SAISD (All Students/SwDs)



Postsecondary School Outcomes

Exhibit 3h shows SPP outcomes for SwDs one year post high school. For all areas, SAISD rates were below state targets and state rates.

Exhibit 3h. Outcomes One Year Post High School for Students who Had IEPs



- **Enrolled in Higher Education.** 20.8 percent of former SAISD students met this criterion (3 percentage points below the state rate and 9.2 points below the SPP target).
- **Criterion A or Competitively Employed.** 39.6 percent of former SAISD students met this criterion (13.8 percentage points below the state rate and 23.4 points below the SPP target).
- **Criterion A, B or In Some Other Postsecondary Education or Training Program.** 52.1 percent of former SAISD students met this criterion (12.5 percentage points below the state rate and 27.9 points below the SPP target).

(See Section III.G. below for more information about this topic.)

Out-of-School Suspensions for More than 10 Total Days

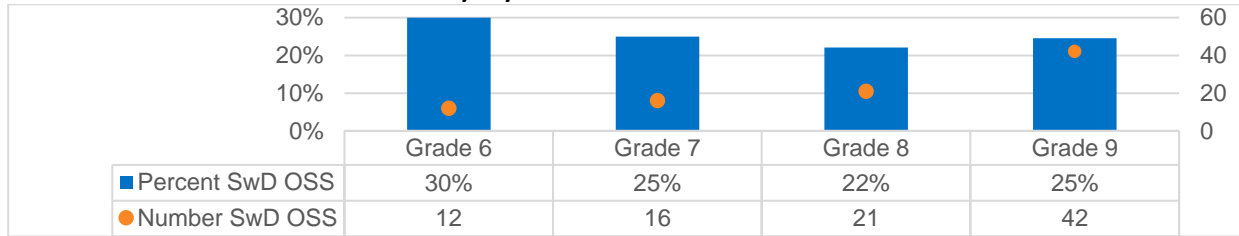
The removal of students from school has a negative impact on achievement. Overall, of all students in 2021-22 with an out-of-school suspension (OSS) for more than 10 total days 23 percent had IEPs (compared to 15 percent of their SAISD composition). Of all SwDs, 1.78 percent received an OSS for this period compared to 1.06 percent of all students without IEPs.

Discrepancies were more significant when considering black and Hispanic students. (No other SwDs received an OSS for more than 10 total days.) Of all black SwDs, 2.17 percent were in this group compared to 0.43 percent of those without IEPs. Hispanic SwDs had an OSS rate of 1.78 percent.

OSSs by Grade

Very few if any SwDs received an OSS for more than 10 days at grade 5 or below and at grades 10 to 12. Beginning at grade 6, OSS rates for SwDs based on the total number of students suspended were in the double digits. Rates were highest at grade 6 (30 percent), followed by grades 7 and 9 (each at 25 percent), and at grade 8 (22 percent). Grade 9 students had the highest number of SwD with an OSS (42 students). (See Exhibit 3i.)

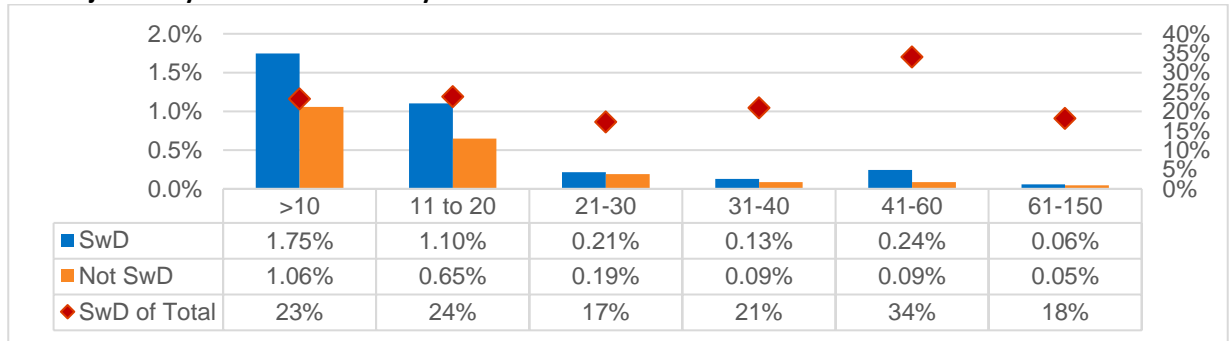
Exhibit 3i. OSSs of More Than 10 Total Days by Grade



OSSs by Total Number of Removal Days

Exhibit 3j shows by the total number of OSS days the rates for SwD and not SwD based on the total number of enrolled students in each group. It also shows rates of SwDs with OSSs based on the total number of suspended students. Based on all students, SwDs are 2.82 times more likely than students with no IEP to have an OSS for 41 to 60 school days (.24 percent to 0.9 percent, respectively). Based on all students with an OSS for this period of time, 34 percent had an IEP.

Exhibit 3j. OSSs by Total Number of Days Removed



An SAISD Dashboard Snapshot for February 17, 2023, shared with the Council SST reported that SwDs comprised 23.14 percent (252 students) of all in-school suspensions and 21.54 percent (446 students) of all OSSs. They comprised a more proportionate 16.62 percent of all students in the disciplinary alternative education program (DAEP).⁵²

⁵² Retrieved from https://docs.google.com/document/d/1mRu2vg5hS-sE0bUTW83adejH_KizyCtN/edit.

Always Learning Objective and Activities Related to Disciplinary Removals of Students with IEPs

In addition to the use of social-emotional learning and PBIS discussed above in Section I, the *Always Learning* plan included the following activities relevant to disproportionate suspensions for SwDs, including those based on race. (See Exhibit 3k.)

Exhibit 3k. Always Learning Content Relevant to Students with IEPs' Disciplinary Removals

IV: SAISD is committed to the social, emotional, and academic development (SEAD) of the whole child through the integration of SEAD into the educational experience in support of positive outcomes for students.

D: Implement a comprehensive, equitable, and positive school climate and culture plan at all school

5. Ensure administrators are knowledgeable about disproportionate use of exclusionary disciplinary practices (such as suspension and expulsion) as it relates to gender, race or ethnicity, and special education status, and ensure that no population of students receives disproportionately more in-school or out-of-school suspension. Establish standards and campus monitoring and accountability protocols by May 2023. Provide professional development in disproportionate use of exclusionary disciplinary practices by July 2023. Decrease disproportionate use of in-school (ISS) and out-of-school (OSS) suspension. Reduce disproportionate use of exclusionary discipline for special education and African American/Black students.

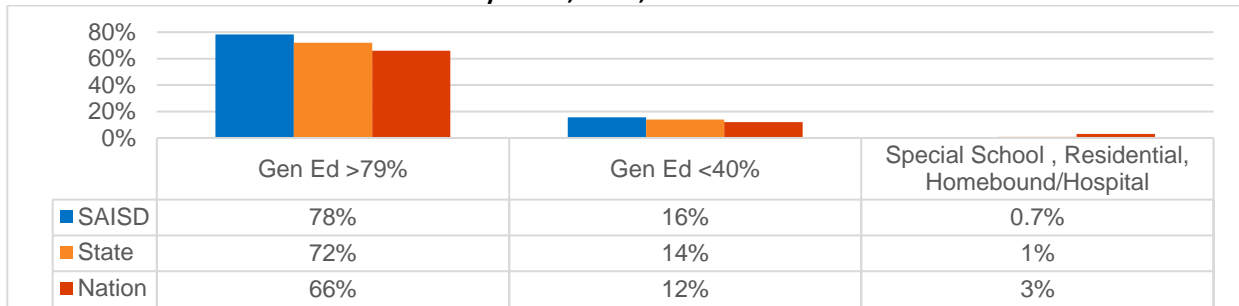
6. Configure the SAISD My Dashboard to include discipline data that is in real time. Analyze the following data points to determine district trends and inform decision-making. Publish a summary report for each campus with the following data: Discipline, disproportion, fidelity inventories (PBIS, RP, SEL), daily wellness check-in, threat assessment, attendance ...

The above *Always Learning* provisions are noteworthy. The content for activity IV.D.5. addresses administrator knowledge, outcome expectations, standards for monitoring and accountability, and professional development. However, it does not call for the identification of disproportionality root causes to inform these activities.

C. Educational Environments for School-Aged Students

The SPP measures the extent to which SwDs are educated within general education classes with typical peers. At 78 percent, SAISD's rate for the most inclusive environment (general education at least 80 percent of the time) is higher than the state and nation (by 6 and 12 percentage points, respectively). For the most restrictive general education environment (less than 40 percent of the time and typical for students educated in separate classes), the 16 percent SAISD rate is higher than rates for the state and nation (2 and 4 percentage points, respectively). With a very low rate of 0.7 percent for students educated in special schools, residential, or homebound/hospital settings, the SAISD rate is lower than the state and nation (1 and 3 percent, respectively).

Exhibit 3l. Educational Environment Rates by SAISD, State, and Nation

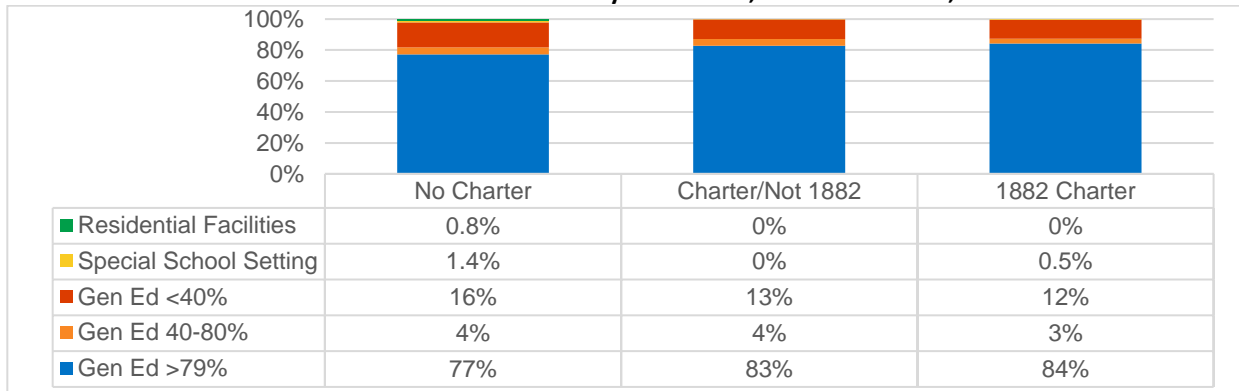


By School Category (Traditional, Charter not 1882, and 1882 Charter)

Overall SwDs educated in charter schools were more likely to be educated with their typical peers for longer periods of time compared to traditional schools. This difference is most likely due to the education of SwDs with less intensive needs in 1882 and district run charter schools.

When comparing rates for SwD educated inclusively by charter status, the rate is higher for 1882 (84 percent) charters and non-1882 charters (83 percent) compared to traditional schools (77 percent), a difference of 6 and 7 percentage points, respectively. Traditional schools also had a higher rate of SwD students educated in separate classes compared to 1882 and non-1882 chartered schools (16 percent, 13 percent, and 12 percent, respectively). Comparable but low rates were found for students educated in general education between 40 and 80 percent of the time. This environment is rarely used and could be better utilized to transition students from more restrictive separate classes. For students educated in a separate school, the rate of 1.4 percent for traditional schools was higher than 1882 schools (0.5 percent) and charters/not 1882 with zero children in this setting. Only traditional schools had any students in a residential facility (0.8 percent). (See Exhibit 3m.)

Exhibit 3m. Educational Environment Rates for SAISD by No Charter, Charter not 1882, 1882 Charter

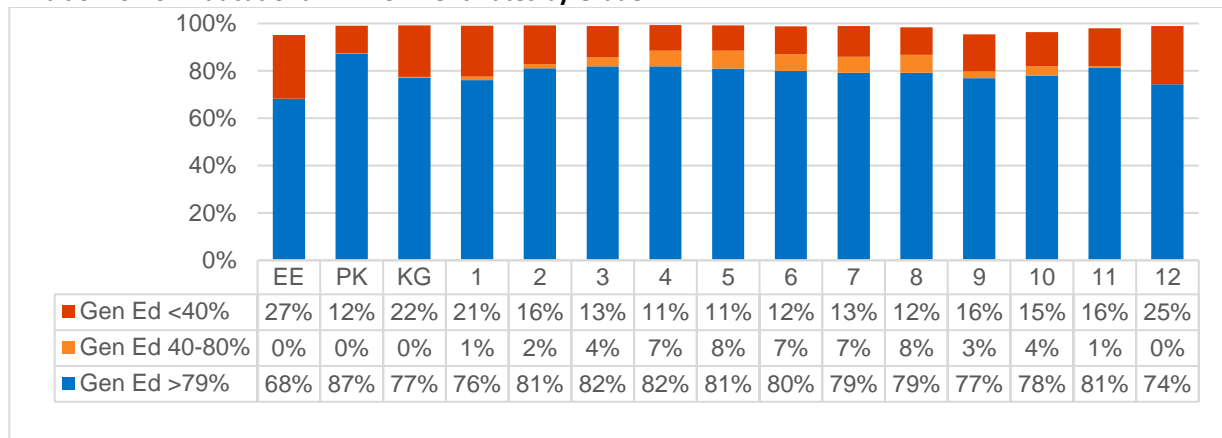


By Grade

As shown in Exhibit 3n, the amount of time SAISD SwDs are educated in general education varies by grade. Focusing on rates for education most of the time in separate classes, children in early

education (EE) have the highest rate (27 percent), followed by kindergarten (22 percent) and 1st grade (21 percent). Curiously, these grades sandwich prekindergarten’s low 12 percent rate. Rates for 2nd through 11th grade fluctuate with no apparent pattern and range by 5 percentage points: 11 percent (4th and 5th grades) and 16 percent (2nd, 9th, and 11th grades). Although 12th grade has a high 25 percent rate, this group includes students over the age of 18 years who remain in school to receive transition services.

Exhibit 3n. SAISD Educational Environment Rates by Grade

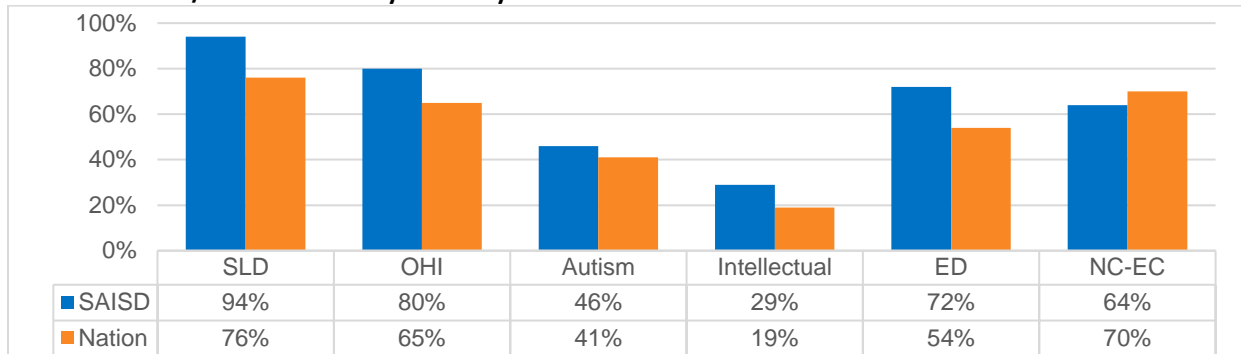


By Disability

Educational environment rates also vary when sorted by disability area. SAISD rates are compared to national data, which are published by the U.S. Department of Education.⁵³ For students educated inclusively, almost all SAISD students with SLD are educated in this environment (94 percent), which is higher than the nation’s 76 percent. District rates are also higher for other health impairment [(OHI), 80 percent to 65 percent], emotional disturbance [(ED), 72 percent to 54 percent], and intellectual disability (29 percent to 19 percent). Rates for autism are closer together (46 percent to 41 percent). SAISD rates lag behind national rates in the area of noncategorical early childhood [(NC-EC), 64 percent to 70 percent, respectively].

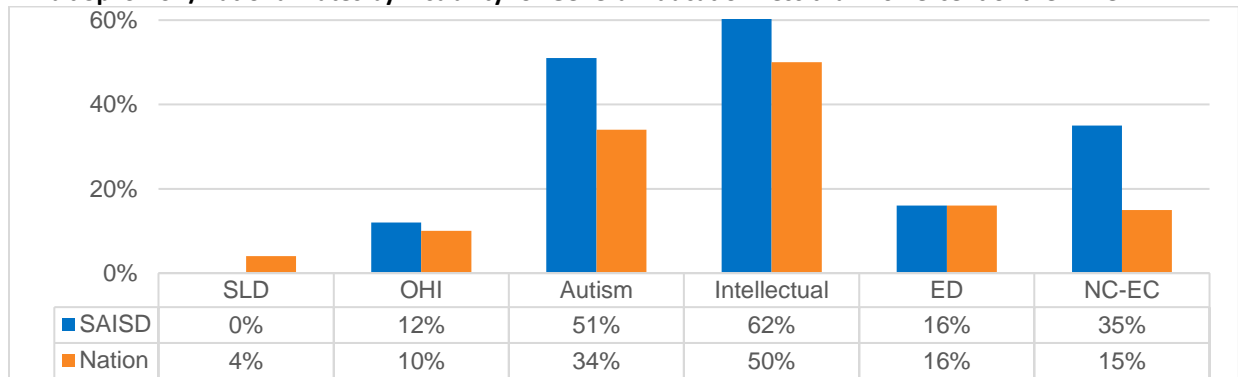
⁵³ Retrieved from <https://www2.ed.gov/programs/osepidea/618-data/static-tables/index.html#partb-cc>. State rates were not published by the U.S. Department of Education.

Exhibit 3o. SAISD/National Rates by Disability for General Education At Least 80 Percent of the Time



For students educated primarily in separate classes, SAISD rates are more than twice higher than national rates for NC-EC (35 percent to 15 percent). District rates are 17 percentage points higher for autism (51 percent to 34 percent) and 12 points higher for intellectual disability (62 percent to 50 percent). SAISD and national rates are closer for OHI (12 percent to 10 percent) and are the same for ED (16 percent). Commendably, no district students with SLD are educated in this setting compared to the nation’s 4 percent.

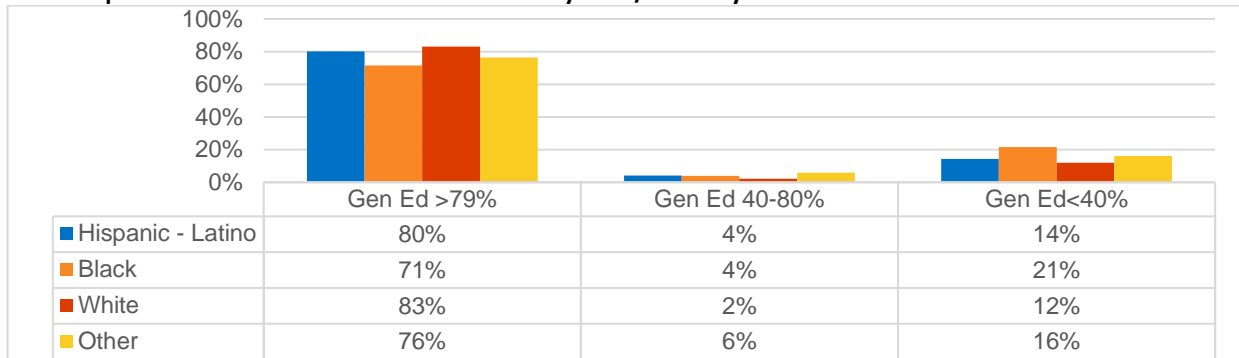
Exhibit 3p. SAISD/National Rates by Disability for General Education Less than 40 Percent of the Time



By Race/Ethnicity

When considering educational environment rates by race/ethnicity, black students are less likely to be educated inclusively (71 percent) compared to white (83 percent), Hispanic (80 percent), and other students (76 percent). Conversely, black students spend more time in separate classes (21 percent) compared to white (12 percent), Hispanic (14 percent) and other (16 percent) students. (See Exhibit 3q.)

Exhibit 3q. SAISD Educational Environment Rates by Race/Ethnicity



F. Instructional Practices for Students Educated Primarily in General Education Classes

SAISD representatives shared guidance documents available for educators “to ensure students have the opportunity to benefit from and make meaningful progress in the general education curriculum” ([Inclusion Handbook](#), [Mild to Moderate Guidance](#), and [Specially Designed Instruction for Success! Math Instructional Leadership for Students with IEPs](#)).

During our focus group discussions, general educators shared instructional strategies and accommodations they used for SwDs. Several teachers referred to their co-teaching experiences, citing creative practices and close cooperative relationships. SAISD has significant challenges, however, to move isolated positive experiences to systemwide practices in every school and class. The following themes surfaced –

- **Focus on Achievement.** Rarely did participants address the academic achievement of SwD. Rather, conversations focused on problematic student behavior.
- **Supplanted Specially Designed Instruction.** As previously addressed above under Section IA (MTSS), various participants expressed concern that SDI too often supplants rather than supplements core instruction. Related to this issue is a belief by some that special educators are primarily responsible for core curriculum instruction.
- **Modified Core Curriculum.** Reportedly, instruction outside of the regular classroom is frequently based on a modified core curriculum. According to information provided to the Council SST, in 2020-21 and in 2021-22 district personnel engaged in an in-depth SDI curriculum and resource review to align with Texas Essential Knowledge and Skills (TEKS). The curriculum was implemented districtwide in fall 2022. The curricular layout addresses the primary TEKS, modifying them on grade level, and using readiness TEKS covered on the state exam. This circumstance may help to explain the prevalence of concerns that modified SDI is used to supplant rather than supplement core curriculum. As discussed above under “Graduation Rates,” while such modifications enable more SwDs to graduate with a regular diploma, they do not prepare a student to meet grade level standards on the STAAR. Participants explained that the use of curricular modifications is a carryover from prior years

when TEA provided statewide assessments based on modified standards. This practice continued for two years after U.S. Department of Education precluded this practice in 2013.⁵⁴

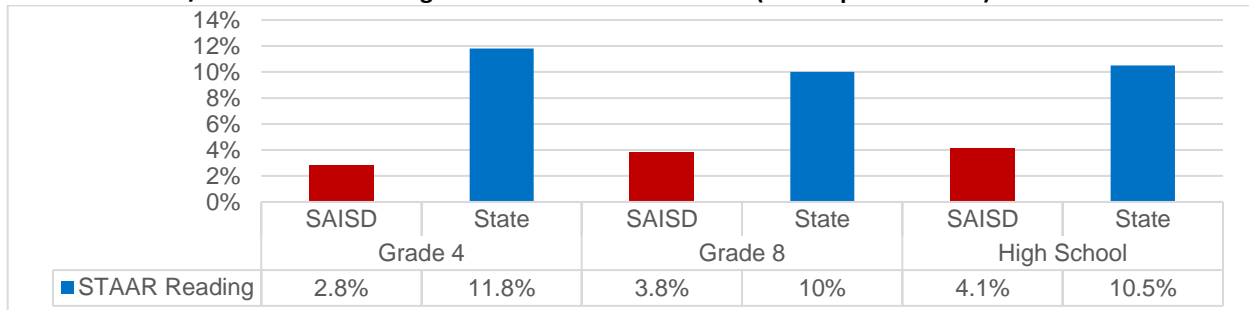
- **Training.** Although disability services has published guidance on co-teaching through its [Inclusion Handbook](#), interviewees expressed the desire for general and special educators to receive substantive training based on individual campus circumstances.

In addition, participants expressed that inclusive instruction is hampered when special educators have high resource and special program caseloads. High teacher turnover also makes building campus capacity a challenge. Sections IV.E. and F. address student-staff ratios and personnel allocation. We note that this circumstance is also related to the high volume of teacher shortages being experienced nationwide.

Reading Instruction

Based on TEA’s latest 2020-21 SPP Report for SAISD, reading rates for the district were far below the state. Respective rates for grade 4, 8, and high school and the number of percentage points below the state were 2.8 percent (-9.0 points), 3.8 percent (-6.2 points), and 4.1 percent (-6.4 points). (See Exhibit 3r.)

Exhibit 3r. SAISD/State STAAR Reading Rates for Students with IEPs (SPP Report 2020-21)



Based on Winter 2022-23 special education MAP data for 3,595 students with included tests, only 7.7 percent (89 students) earned a 61 or above percentile score and were thought of as ACT College Ready.

Students with reading IEP goals receive instruction using IMSA (through 5th grade) or Lexia (6th through 12th grade). Coaching meetings are available for Lexia teachers, but they are reportedly not well-attended. At the elementary level, these reading interventions are taught for 45 minutes as part of the 160-minute English language arts bloc. For high schoolers, reading is available as an elective. Reportedly, both programs are taught by a resource special educator trained in

⁵⁴ Retrieved from <https://tea.texas.gov/about-tea/news-and-multimedia/commissioner-blog/federal-regulations-cause-testing-changes>.

dyslexia intervention or dyslexia teachers who are certified to teach special education. Staffing caseloads vary based on student needs.

According to TEA's September 23, 2021, *Updates to Dyslexia Handbook: Procedures Concerning Dyslexia and Related Disorders*, to provide effective intervention school districts are encouraged to employ highly trained individuals to deliver dyslexia instruction. Educators, such as reading specialists, master reading teachers, and general and special educators may provide dyslexia intervention if they at a minimum have documented dyslexia training aligned with 19 TAC §74.28(c) and deliver instruction with fidelity. Such educators are not required to be certified as a special educator for SwDs if they are "the most appropriate persons to offer dyslexia instruction."⁵⁵

Reportedly, in the past disability services coordinators were able to review student progress recorded electronically as part of the reading program but this activity is not supported by IMSE. The district has purchased but has not yet launched the Acadience online assessment system based on DIBELS for progress monitoring. Lexia has an internal monitoring program. It is not clear whether and to what extent principals are expected to review student progress data.

Writing Instruction

Various interviewees spoke about the difficulty SwDs have writing, based in part on their inability to think in sentences. It is also difficult for many to write using technology that STAAR and interactive notebooks require, incentivizing a move away from using paper and pencil. Generally, students do not have the typing skills required for fluid writing, and the curriculum does not include this skill development.

When discussing the use of speech-to-text for writing assessments, interviewees responded that the STAAR does not allow this accommodation. However, the following post from TEA reported that this functionality began in 2020-21.

New Speech-to-Text Functionality Speech-to-Text (SST) tool will be available online for students who meet the eligibility criteria for Basic Transcribing or Spelling Assistance, and for whom Speech-to-Text is the most appropriate method of delivery for these supports.⁵⁶

Math Instruction

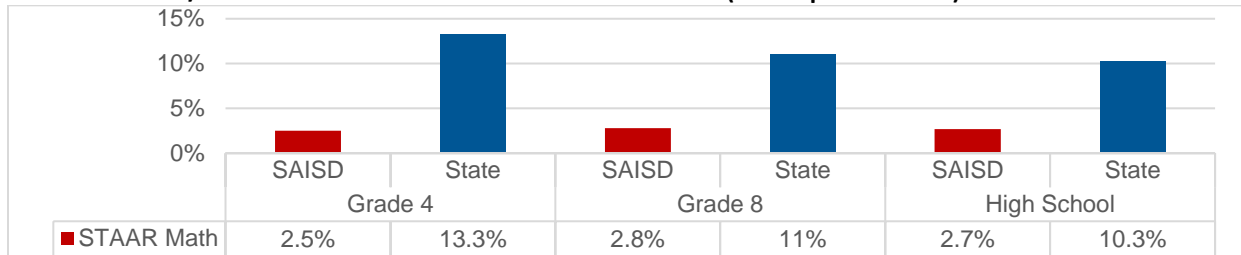
The latest SPP data for SAISD (2020-21) reported math rates for SAISD that were far below state rates. Respective rates for grade 4, 8, and high school and the number of percentage points below

⁵⁵ Retrieved from https://tea.texas.gov/sites/default/files/updates-to-dyslexia-handbook-procedures-concerning-dyslexia-and-related-disorders-dyslexia-handbook_0.pdf.

⁵⁶ TEA 2020-21 Accessibility Updates, pp 8-9, retrieved from <https://tea.texas.gov/sites/default/files/2020-2021%20STAAR%20Accessibility%20TETN.pdf>.

the state were 2.5 percent (-10.8 points), 2.8 percent (-8.2 points), and 2.7 percent (-7.6 points). (See Exhibit 3s.)

Exhibit 3s. SAISD/State STAAR Math Rates for Students with IEPs (SPP Report 2020-21)



Based on Winter 2022-23 MAP data for 3,682 SwDs’ included tests, only 7.6 percent (91 students) earned a 61 or above percentile score and are considered to be ACT College Ready. This rate is about the same as the 7.7 percent reading rate. (See text below Exhibit 3r.)

Interviewees reported that across the district math scores fell more than reading scores post Covid, and core math instruction is problematic. Reportedly, this circumstance occurred across the state. There is a perception that special educators need more training to increase their understanding of math development. Also, as with reading, co-teaching availability for this area varies by campus.

“Hand to Mind” manipulatives are used to support instruction with 30-minute periods, but there was feedback that this intervention is not structured and sufficiently comprehensive. Acadience Math is used for universal screening to identify students in need of extra help, monitor progress, and measure effectiveness of school-wide mathematics support. To provide greater guidance, disability services developed a math guidance document for resource teachers, [Resource Curriculum Frameworks](#). The document focuses on a Guided Math flexible framework aligned to the SAISD curriculum. A calendar with four days of instruction and a Friday’s “Differentiation Day” is offered to reinforce learning, work on IEP goals, etc. Classroom “Look Fors” with evidence and guiding questions for students, teachers, and administrators are also provided. There are plans for a summer institute for math co-teachers, with grant funding for reimbursement.

Supports for Teaching and Learning

SAISD personnel provided additional information about ways in which teaching and learning is supported for students with IEPs.

- Professional Learning.** Training by the Crisis Prevention Institute (CPI) is required for special educators and instructional assistants (IAs) and for new special educators on eSped, the district’s IEP electronic system. There are concerns that too few CPI training sessions are available for individuals to fulfill their mandatory attendance. All new SAISD teachers are provided an overview and specific best practices for special education instruction. Also, during Curriculum Day, special educators who teach in the Alternative Learning Environment

(ALE) and Early Childhood Special Education (ECSE) programs receive training on the alternative curriculum training appropriate related resources.

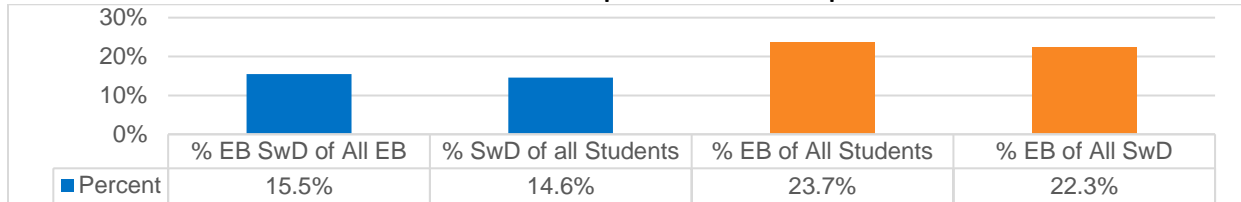
Although disability services administrators can train staff from the department on relevant teaching and learning and compliance issues, for the reasons described earlier in this report about training barriers important information is not consistently communicated to school-based personnel. In addition to these reasons, disability services administrators no longer meet with principals during their meetings with assistant superintendents, and training for new teachers on IEP development was cancelled due to substitute shortages. Interviewees expressed a strong desire for mandatory training on matters critical to the operation of special education, and on strategies for escalating the achievement for students with IEPs. As appropriate, participants would include principals, special and general educators, and TAs. (The *Always Learning* plan at VI.B.3. provides for the redesign of monthly professional learning network meetings for principals and assistant principals to ensure a focus on the instructional core. Because of this activity's relationship to new instructional superintendent networks, this issue is included in and addressed after Exhibit 3s below.)

- **Support for Students as they Transition Between Grade Levels.** As students matriculate between grade levels, i.e., preschool to kindergarten, elementary to middle school, and to high school, and especially when they change schools, communication is vital to smooth transitions. This is especially true for students with a need for more significant support. Disability services has prepared various guidance documents for ECSE to Elementary ([Guidance](#) and [Handbook](#)) and for rising 6th and 9th graders ([Guidance](#)). Although these documents recommend that each sending school schedule ARD meetings with the receiving campus to plan for student transition, reportedly these are not standard district practices.
- **Data & Progress Monitoring.** Various SAISD documents contain requirements for special educators and related service providers to collect at least one data point each week for each IEP goal or objective. ([Progress Monitoring](#) and [Responsibilities](#)) Case managers are also expected to monitor student [course](#) progress regularly. The Council SST notes that data collection is only as good as the IEP goal or objective written and the extent to which they measure progress aligned with core curricular standard outcomes.
- **Assistive Technology.** Disability services has processes and personnel in place to support the assessment and provision of assistive technology that is IEP-driven. The *Always Learning* plan at IX.C: Classroom Technology states that “SAISD will provide all students and [t]eachers with future-ready classroom technology that is student-centered, promotes creativity, critical thinking, collaboration, and engagement in a flexible learning environment.” Some school districts that have been visited by the Council SST have made technology available broadly without regard to disability status in areas such as text to speech and speech to text devices, etc. As more technology devices are available generally, reliance on specialized support is reduced.

D. Emergent Bilingual Students with Disabilities

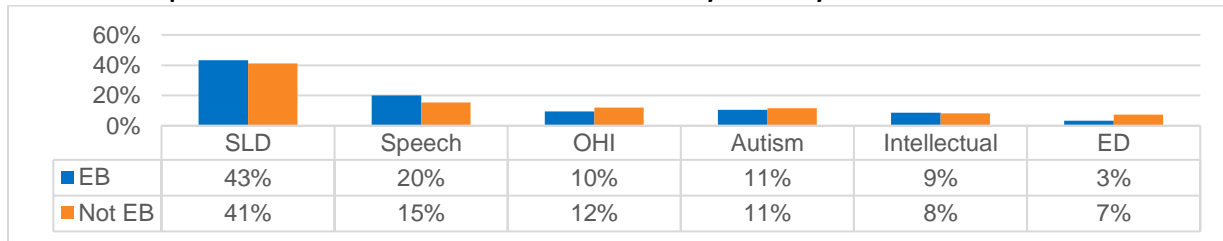
Emergent bilingual students are not disproportionately identified as needing special education based on two different comparison groups. Of all SAISD students, 14.6 percent have an IEP and 15.5 percent of all EB SwDs. Also, EB students comprise 23.7 percent of all SAISD students, and EB SwDs comprise 22.3 percent of all SwDs. The .9 and .4 percentage point respective differences for these two comparison groups are not significant. (See Exhibit 3t.)

Exhibit 3t. Various Rates of EB Students with IEPs Compared to Other Groups



As shown in Exhibit 3u, EB SwD rates for the most common six disabilities are not significantly different from non-EB SwD rates. Although in the area of speech, 20 percent of EB students are identified compared to 15 percent of non-EB students, the difference has a risk ratio measure of 1.3. (A ratio of 2.0 would raise concerns.)

Exhibit 3u. Composition of EB and Not EB Students of All SwDs by Disability Area



Based on Winter 2022-23 MAP reading data for 476 EB SwD with included tests, 11.3 percent (23 students) earned a 61 or above percentile score and were considered to be ACT College Ready. It is noteworthy that this rate is above the 7.7 percent reading rate for all SwDs.

To ensure that EB student’s language acquisition needs are considered when designing IEPs, SAISD requires Language Proficiency Assessment Committee (LPAC) representatives to participate in ARD committees. Reportedly, this requirement is not consistently met, and representatives are not always familiar with the student who is the subject of the ARD.

According to written information SAISD provided to the Council SST, EB SwDs educated inclusively receive linguistic instructional accommodations in addition to IEP-specified instruction and services. Although annual training focuses on the importance of the LPAC coordinator’s voice when considering the type of linguistic support appropriate for a student, too often decisions for providing a student with ESL support rather than dual language is based on staff and classroom availability. Also, depending on the availability of bilingual special educators, instruction may not always be available in a student’s dominant language. Interviewees shared that although the

past belief that special education instruction “trumped” linguistic support has decreased, this perspective has not been eliminated.

In addition, all teachers, instructional coaches, and instructional specialists are given training each year through new teacher orientation, PD at campuses, and district-wide PD. Various guides have been developed to support campus personnel ([EB with IEP Handbook](#), [Siempre Bilingue Training](#), [Summer EB with IEP Training](#), [Esperanza Training](#), and [Literacy & Biliteracy Handbook](#))

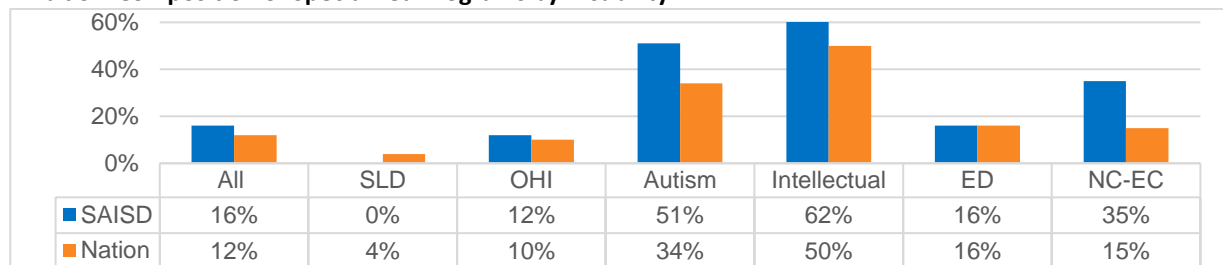
Interviewees shared the following additional concerns –

- **Bilingual EC.** With only four EB early childhood classes in the district, there is a need for more.
- **EB Special Education Training.** For the last two years there has been no mandatory EB training, and principals have not participated voluntarily. This circumstance is a product of persistent staffing and substitute shortages. When invited by a campus, EB and/or special education training is provided. In addition, SAISD staff have met with principals to show how they could support teachers with low achieving SwDs to try to generate training invitations.
- **Parent Denial of EB Linguistic Support.** Based on SAISD data, 37 percent of EB SwDs have parents who do not consent to ESL or dual language instruction for their children. Although the 258 denials are lower than previous year figures, SAISD staff remain concerned about this issue.

E. Special Programs

Overall, compared to the nation SAISD has a larger percentage of SwDs educated in separate classes most of the time, typically in specialized programs (16 percent to 12 percent, respectively). As shown in Exhibit 3v and referenced above, SAISD, commendably, does not educate separately students with SLD. District rates for various disabilities educated in this setting is higher than the nation: NC-EC (35 percent, by 20 percentage points), autism (51 percent, 17 points); intellectual disability (62 percent, by 12 points); and OHI (12 percent, by 2 points). Rates for students with ED are the same for both SAISD and the nation (16 percent).⁵⁷

Exhibit 3v. Composition of Specialized Programs by Disability



Unlike other districts with which the Council SST has experience, it is exemplary that SAISD does not have a large number of separate class programs based on disability categories. Instead, the

⁵⁷ Rates for Texas are not publicly reported by the U.S. Department of Education or TEA.

district organizes most special program classes by two major categories: behavior support class (BSC) and alternate learning environment (ALE). These programs are described below and accompanied by concerns that focus group participants raised.

Behavior Support Classes (BSC). This program is for students with severe behavior that interferes with all learning across all contexts. Teachers are certified in special education and general education as a generalist for the grade band. These teachers utilize the scope and sequence, and instructional/curricular guidance used by general educators. The [instructional](#) guidance reflects Texas Teacher Evaluation and Support system (T-TESS) domains and dimensions to support relevant planning, evidence, and examples and tools for BSC teachers. Interviewees shared the following –

- **High School Support.** Because high school does not have a “generalist” certification, SAISD does not offer any BSC classes at the high school level. As a result, students who have been in this program, perhaps for many years, are educated inclusively at ninth grade even though their behavior continues to be significant and interfere with learning across all contexts. There are concerns that these students may be likely to drop out as a result.
- **Struggling Schools.** There is a perception that BSC units are disproportionately placed in struggling schools.
- **Modeling Practices.** Administrators who visit BSC classes have not modeled best practices or shared ways in which teachers may receive additional support and training to improve their instruction.
- **Race.** Students in the BSC program may be disproportionately represented by race and gender (male). The Council SST did not have data to assess this issue.

Alternative Learning Environment (ALE). Designed for students with mild to severe cognitive disabilities, ALE classes educate students with various disabilities, such as autism, intellectual disability, etc., who require highly intensive instruction and services. To support improved instruction of students with significant cognitive disabilities who participate in alternate assessments, SAISD implemented an adapted core standards-based curriculum with training for curriculum implementation, the Texas English Language Proficiency Assessment System (TELPAS ALT), and STAAR- ALT. Also, SAISD has invested in TeachTown, a well-known blended learning tool based on an adapted curriculum for students taking the STAAR-Alt. Interviewees expressed two concerns –

- Teachers lacked training necessary to implement the tool before its receipt and expected use.
- Students with aggressive behavior have been placed in the ALE program, with teachers lacking training and support, placing other students at risk.

Participants raised several additional issues relevant to other specialized programs that merit attention.

- **Instruction for Students who are Deaf.** Interviewees expressed concern that SAISD lacks enough teachers with a credential to teach students who are deaf, and certified sign-language interpreters. This circumstance leaves some students without teachers and instructional assistants with whom they can communicate and learn how to sign and improve their skills. The use of written text to communicate is insufficient for teaching and learning.
- **Emergent Bilingual Students with Disabilities.** When the ARD/LPAC develops an IEP that references a special program, the student may receive dual language, but the student's schedule may only permit a limited amount of instruction in the dual language classroom setting.
- **Choice Schools.** Reportedly, traditional schools house BSC or ALE programs and requests to do so have been denied. The lottery for charter schools and traditional choice schools is blind and students needing one of these programs may be selected. This presents a decision-making challenge for a charter school or traditional choice school and student/family regarding accepting the selection without a program in which the student who would otherwise be placed or transferring to another school with the relevant program.

F. *Always Learning* Components Related to Teaching and Learning

The *Always Learning* plan includes numerous provisions with high expectations associated with teaching and learning for SwDs. As shown in Exhibit 3w, these include differentiated, aligned, and challenging curriculum, use of challenging instruction, and associated training (III.C.8); rigorous PK-12 curriculum aligned with college, career, and military readiness (CCMR) (III.I); and high-quality and multiple career pathways to college and careers. (III.J.1).

Exhibit 3w. *Always Learning* Provisions Related to Teaching and Learning for Students with IEPs

III.C.8. Provide students with IEPs a differentiated, aligned, and challenging curriculum that facilitates independence in all areas of life and promotes progress toward college-readiness or post-secondary transition goals. Embed high use, standards-aligned supports into instructional frameworks and practices for all RLA/SLAR courses by August 2023. Conduct program reviews to ensure equitable, challenging instruction that prepares students in literacy for College Career and Military Readiness (CCMR) in: Mainstream, Resource and Inclusion, Early Childhood Special Education (ECSE), Alternative Learning Environment (ALE), Behavior Support Curriculum (BSC) by August 2023. Conduct PD for all instructional staff in implementation alignment by Spring 2024. (Same for math, science, social studies.)

III.I: Build a rigorous PK-12 curriculum aligned to CCMR standards which includes advanced coursework and high-quality career pathways to ensure all students are prepared to succeed in college and postsecondary endeavors. Define standards for counselors and other school personnel to meet high expectations in postsecondary planning and attainment for all students including those who have been historically underserved (e.g., Emerging Bilingual students, students with IEPs) by looking holistically at all indicators including grades, aspirations, and teacher recommendations for placement in advanced courses, internships, and other college ready experiences. (Repeated in J below)

III.J: CCMR for Special Education Students. Create intensive support systems that ensure students with disabilities (SwD) have equitable access and support to succeed in advanced coursework and high-quality career pathways so that they succeed in college and postsecondary endeavors.

1. Design and implement a plan for college readiness for SwD: Ensures multiple pathways to college and careers for SwD; Deepens connections among pre-K–12 and other systems that provide supports to SwD; Improves access to guidance, counseling, and transition services. Publish by 1/2024; Create a plan for counselors and school staff to mentor, monitor, and guide families to navigate graduation policies, and transition into post-secondary goals of certification, trade school, or college by 5/2024. Enlist the support of the Special Education Advisory Council to create a draft plan by 12/2023 and publish by 1/2024.

IX.C: Classroom Technology. SAISD will provide all students and Teachers with future-ready classroom technology that is student-centered, promotes creativity, critical thinking, collaboration, and engagement in a flexible learning environment.

The above provisions present several areas that merit further discussion.

III.C.8. In pertinent part, the activity provides for SwDs to have a challenging curriculum promoting progress toward college-readiness (or post-secondary transition goals), program reviews to ensure challenging instruction is preparing students for CCMR in various special programs (including ALE), and associated PD. This activity addresses literacy and similar activities address math, science, and social studies. The activity on its face does not appear to address the following.

- **Use of Modified Standards.** As previously discussed, graduation criteria and SAISD/TEA allow for instruction based on a modified curriculum. Such a curriculum is not aligned with instruction designed for students to meet: 61 or above MAP percentile score (for ACT College Ready), reading and math proficiency on standards measured by the federal SPP and state CCMR expectations.
- **Application to Alternate Learning Environment (ALE).** Although this activity has a worthwhile goal to be inclusive of the ALE program, CCMR involves much different learning than appropriate for students in this program who participate in the STAAR-Alt and receive instruction based on standards aligned with that assessment.
- **Professional Development.** As previously addressed, there are many institutional barriers to the receipt of PD by school-based personnel that must be addressed for all instructional staff to be trained in “implementation alignment” by spring 2024.

III.I. Build rigorous PK-12 curriculum aligned to CCMR standards. This provision, which addresses such historically underserved students as SwDs (and EB SwDs), includes in its description placement in advanced courses. Although the goal is lofty and may be reachable by some, a majority of SwDs have reading and math levels far below GL standards, and many have been receiving instruction based on a modified curriculum. While SwDs with low achievement may participate in advanced courses, they will not be successful without a significant investment of support.

- **Core Instruction and Supplemental SDI.** SAISD must directly address the issue of specially designed instruction being practiced as a supplement to instruction based on GL standards.

Transitioning from a teaching and learning paradigm relying on modified instruction supplanting core curriculum deserves a goal and/or activity aligned with this purpose.

III.J. CCMR for Students with IEPs. This goal emphasizes success in advanced coursework and pathways for college and careers. Post-secondary goals of certification, trade school or college are specified. Further, the goal calls for the enlisting the support of the Special Education Advisory Council (SE PAC) to create a draft plan.

- **Inclusive Goals.** For older SwDs with significant underachievement based on GL standards, it will be extremely difficult for them to escalate their achievement in the time available to be successful in advanced courses and be ready for college, and reach goals of certification, trade school, or college. This is especially true for students with significant cognitive disabilities and take the STAAR-Alt. While these students could be competitively employed with varying amounts of support, job sites typically do not require certification, trade school or college. Goals that reflect transition to instruction based on GL curricular standards, and one year post high school enrolled in some educational program or employment would be appropriate.

IX.C: Classroom Technology. Unless specifically stated, the area of classroom technology is not likely to include assistive technology and the seamless incorporation of devices and programs.

G. Secondary Transition Activities and Services

The Individuals with Disabilities Education Act (IDEA) includes transition services requirements, which require a results-oriented process focused on improve academic and functional achievement to facilitate students' movement from school to post-school activities. These activities are inclusive, and include postsecondary and vocational education, integrated employment (including supported employment), continuing/adult education, adult services, independent living, or community participation. IEPs must consider each student's strengths, preferences, and interests to develop employment/other post-school adult living objectives, and as appropriate daily living skill acquisition. For students beginning at the age of 16 years, the IEP must list transition services and courses of study that will reasonably enable them to meet their postsecondary goals.

As discussed above and shown in Exhibit 3h above, SPP measures student outcomes one year after leaving high school. SAISD outcomes show 20.8 percent of SwD were enrolled in higher education, 18.8 percent were competitively employed, and 12.5 were in some other postsecondary education and training program. Almost half (47.9 percent) of SAISD students were not engaged in any of these activities one year after leaving high school. Reportedly, this information is based on SAISD staff outreach to a sample of students provided by TEA.

Disability Services Staff Support

Disability services staff supports transition activities with a team of 26 persons, which includes five transition specialists (down from eight and with one vacancy) and four secondary program specialists. Also, each comprehensive high school has a transition specialist.

According to information provided by SAISD representatives, case managers begin transition planning with students no later than sixth grade. As TEA requires, career and technical education (CTE) representatives attend eighth grade transition ARD meetings to discuss career goals and pathways. In SAISD, when possible one of the student's ninth grade teachers attend the meeting to knowledgeable outline course components and assess the accommodations and/or supports needed by the student. A College Bound Advisor (CBAs) is present at each of the seven comprehensive high schools to help students learn about their options, completing college applications/FAFSA, and supporting students and parents throughout the process. All students are eligible to take the PSAT, SAT, and ACT, and a high percentage of SwDs are approved for test accommodations.

Based on information provided by SAISD representatives, disability services staff collaborate with their CTE/CCMR colleagues to train CTE teachers, attend PLCs and department meetings, etc. Also, disability services transition specialists work with College Bound Advisors to support students applying for college/FAFSA and needing accommodations for state board examinations for industry-based certifications. Interviewees commented that more assistance is needed for CTE teachers to understand ways in which their instruction can meet TEKS standards for struggling SwDs. Currently, teachers are figuring out their approaches individually.

Adult Years Vocational Program at WW White Transition Center

SAISD's Adult Years Vocational Program (AYVP), which is housed at the former elementary school WW White, provides transition activities and support for students between the ages of 18-21 with such developmental disabilities as autism, intellectual disabilities, and other health impairments.⁵⁸ Having completed their high school credits, the students receive additional transition services to function academically, behaviorally, and/or independently after high school. Students learn about transportation, housing, respite, and daily living services in collaboration with their family and community agencies. The program also connects students with an adult agency that will continue job support after they turns 21 years of age.

Interviewees spoke highly of Project Search, which has supported about 12 student interns with a job coach at various work sites. All of them remained employed one year after high school. Unfortunately, there is a wait list for the program due to its limited capacity. Interviewees also expressed concern that that WW White transition center is not centrally located, is old, and the facility is not "in good shape." At one time the program was housed at a community college but

⁵⁸ Retrieved from <https://www.sacrd.org/directory/program/print/10590>.

for some unknown reason it was moved to the former elementary school. The program is slated to move to a central site in SY 2023-24.

Always Learning Component/Activity Regarding CCMR and Work-based Learning

The *Always Learning* plan at III.M. includes various activities to support work-based learning and internships for all student groups. These type of activities are essential for SwD for whom disability employment rates are far below rates for persons without disabilities. For example, the 2022 youth labor force participation rate (ages 20 to 24) was 50 percent for disability and 72.1 percent for no disability.⁵⁹ Selected *Always Learning* plan content are shown in Exhibit 3x.

Exhibit 3x. Always Learning Plan Content Related to Work-based Learning and Internships

- III.M. Work-based Learning and Internships. Provide authentic, real-world learning experience that support CCMR and provide economic opportunity for students. 100% of students will have access to WBL experiences in high school.
1. Create an integrated Work-based Learning (WBS) plan for each high school by grade level for all student groups. By August 2023 establish a system that allows SAISD departments to provide internships for students.
 2. Design a WBL program that will allow all student to gain authentic workforce knowledge and experience prior to graduation that includes:
 - A baseline of current successful WBL activities and partnerships.
 - Dedicated WBL employer, industry, and community partnerships by school.
 - A new WBL Data Management system that contains, monitors, and tracks specific WBL data by school, program, student group, grade level, and partner.
 - Tracks student WBL and employment data after graduation.
 3. Create a repository for WBL portfolios that demonstrate each student’s WBL activities over the four years that includes

For all SwDs to have access and receive WBL experiences that are meaningful, a sufficient number of job coaches will be necessary for SwDs who need this support, such as students with moderate or severe disabilities. Also, identifying a sufficient number of WBL employers, and industry and community partnerships is more difficult for this student group and disability services personnel would benefit from additional SAISD support for this endeavor.

G. Family Involvement

⁵⁹ Disability Employment Statistics, U.S. Department of Labor, Office of Disability Employment Policy, retrieved from <https://www.dol.gov/agencies/odep/research-evaluation/statistics>.

Another important element of human capital is the involvement of families of SwDs. According to the guide published by the Harvard Family Research Project –

One of the most effective means of ensuring academic success is to engage families in their children’s education. While family engagement confers benefits to all students, those with disabilities often require a greater degree of parental involvement and advocacy than their peers without disabilities to be assured of receiving the same level of instruction as the general student population. Children with disabilities often face multifaceted classroom challenges requiring special attention from instructors and active engagement from their families. Their families play a number of supporting roles, including being advocates and providing valuable insight into their specific needs to instructors, who may at times feel pressed by trying to meet the needs of diverse groups of students. There are rarely any simple answers to balancing the needs of each individual child with disabilities with others’ needs, with competing structural, bureaucratic, pedagogical, and emotional factors often adding extra layers of effort and complexity for everyone involved. But when families and educators work together as partners, it enhances the likelihood that children with disabilities will have positive and successful learning experiences.⁶⁰

Two disability services parent liaisons provide various direct services, including translation services for Spanish-speaking parents support during ARD meetings, etc. (See [Navigation Form](#).) They also participate in on-campus functions (e.g., [Parent Nights](#)), facilitate trainings for parents in collaboration with district personnel and external agencies, contact parents to complete parent surveys, and help organize the annual disability services resource fair. Interviewees added that the liaisons help to support the Special Education Parent Advisory Council (SEPAC), collaborate with Family and Community Engagement (FACE) specialists to address enrollment and transfer concerns. Reportedly, they have not yet collaborated with the family and student support services for students who are homeless. In addition, four disability services social workers work with the parent liaisons to carry out these activities. The liaisons are supervised by the CCMR/Transition director.

The disability services webpage has a link for parents that includes newsletters. The last published newsletter of October 2022 was 13 pages filled with excellent information for parents (in English and Spanish) and included multiple links to more information.⁶¹ Under parent resources there is a link to TEA information concerning procedural safeguards and the ARD process. There is also a link to “aiding students who need special education or Section 504 services” in SAISD. While useful, the information is not provided in Spanish. Reportedly the disability services department offers training to parents, but the webpage does not link available

⁶⁰ Family Engagement and Children with Disabilities: A Resource Guide for Educators and Parents, Harvard Family Research Project, retrieved from <https://ctserc.org/documents/resources/Family%20Engagement%20and%20Children%20With%20Disabilities%20A%20Resource%20for%20Educators.pdf>.

⁶¹ Retrieved from <https://www.saisd.net/page/sped-home>.

opportunities and its sole reference to SEPAC is an application form for parents interested in becoming a member.

Various issues were shared by interviewees concerning the involvement of families to support their children with disabilities.

- **Valued ARD Participant.** Importantly, all parents do not feel they are welcomed members of the ARD committee and, especially parents who are immigrants, lack a voice at the table. Post Covid, parents have slowly returned to schools and their involvement has been slow to build.
- **Training.** There is much interest in parent training, along with on-line and in person information on areas of interest to families, such as how parents could help to support their children.
- **SEPAC.** At the time of the Council SST’s visit to SAISD in early March 2023, SEPAC had met once with about 15 participants. There is a desire to increase parent involvement, reach parents at every school, and work with other district support groups such as those available to parents of homeless students, FACES, etc.

Several parents submitted written comments for the Council SST following the visit. These included –

- Desire for a communication mode other than email for families to communicate with disability services personnel. Principal autonomy has resulted in inconsistent communication about important information to parents and families.
- Inconsistent disability services personnel expertise required to support all programs they oversee. It is perceived that staff and leadership turnover has contributed to this problem.
- Need for campus personnel to have more knowledge about special education and 504 processes, and instruction of students with various disabilities. More training is needed for service providers, teachers, and principals to support improved teaching and learning, including for students educated in specialized programs. One outcome is that communication with parents during ARD committee meetings is not consistently positive and leading to successful teaching and learning.
- An insufficient number of special educators, instructional assistants, speech and language pathologists, and assistive technology experts.

Always Learning Plan Content Related to Family Involvement

The *Always Learning* plan includes several provisions related to the engagement of students, families, and community partners. Relevant provisions are shown in Exhibit 3y.

Exhibit 3y. *Always Learning* Plan Content Related to Family Involvement

XI: Engage Students, Families, and Community Partners

A: SAISD will actively communicate, engage, and empower SAISD families and community members to improve outcomes for students.

7. Develop professional development modules for school leadership and faculty on clear communication, maintaining a welcoming school culture, honoring family cultural values, and creating a sense of stability for families.
9. Expand professional learning experiences, including micro-learning videos, easily accessible via multiple platforms for families for key topics to provide easy access to information, including: safety, attendance, academic support, college access, family self-advocacy, SEL, other based on family input
14. Solicit feedback and improve the SAISD Systems of Care website and ensure/include information for families to support student learning and access community resources.
- 16 Provide welcoming spaces for families, including family rooms, family center serving as a resource hub for families.
18. Create a Parent Mentor Program where engaged families act as mentors for other families to increase engagement with compensation for their time.
19. Create forums to provide specialized support for families, including support for Grandparents Raising Grandchildren; guardians of unaccompanied minors or immigrant parents; families of children with autism; families of children with disabilities in early childhood; families navigating housing insecurity; and teen parents
21. Establish Parent Teacher Association (PTA) or Parent Teacher Organizations at every campus. Create a President's Council (PTA president of each campus) to meet quarterly with the Executive Team in 2023-2024.

XII.A.15. Improve communication with families by increasing communication channels, including using: ... Districtwide Family Fair where families are provided workshops, family activities, performances, and food.

The above *Always Learning* content presents several areas that merit further discussion.

XI.A. Actively Communicate, Engage, Empower Families and Community Partners. This goal and related activities are excellent. However, the families of SwDs (including those who are EB) are not likely to feel engaged and empowered unless the particular issues facing their children are addressed. To ensure this goal is inclusive of these families and address their concerns, the activities should take into consideration SEPAC and other parent feedback regarding content and modes of communication. Additional comments concern the following activities –

14. Systems of Care Website. Although this website is prominently displayed under the Parents & Students heading, the content is general in nature and when implemented there needs to be links to resources and information relevant to families of students with diverse disabilities.

16. Welcoming Spaces for Families. To the extent possible, have one or more individuals consistently welcome families and become familiar with their needs. This could be accomplished through volunteers or employees from various funded programs to enhance the parent and family experience.

18. Parent Mentor Program. Continue to engage SEPAC and other disability organizations having contacts with SwD families would help to ensure the program is inclusive of mentors sensitive to the issue of families raising children with disabilities.

19. Forums for Specialized Family Support. By identifying only families of children with autism and children with disabilities in early childhood, the activity text unnecessarily excludes families of children with all types of disabilities and grade levels. When developing these forums, programs need to be sufficiently broad to be of interest to all families of SwDs.

21. PTAs/PTOs and President’s Council. Although a good idea, these groups typically are not inclusive of interests associated with SwDs. Consider having each PTA/PTO include a committee for SwD families and teachers, with representatives meeting quarterly with each respective instructional superintendent, and semi-annually with the executive team in 2023-24.

XII.A.15. Improve Family Communication. When developing increased communication channels, including a districtwide family fair, consultation with SEPAC and other family representatives is necessary to ensure communication channels and fair activities sufficiently include areas of interest to a wide range of SwD families.

Recommendation 4. Expedite improvement of instruction and supports to accelerate SwD achievement and postschool outcomes.

As reflected in the Board of Trustees goals and various component goals in the SAISD Always Learning plan, the achievement and well-being of all students, including those with disabilities, is a major concern. The activities below are suggested to boost teaching and learning for SwDs.

- a. **Leadership Team Engagement.** Have representatives of the SAISD MTSS leadership team referenced in Recommendation 1a engage in the activities below.
- b. **Data Review.** Review data and associated text (along with other relevant data) for the following areas, disaggregated by traditional, 1882, and charter schools. For these and any other areas of concern/interest, develop hypothesis for data patterns to take follow up action.

Early Childhood SPP Outcomes and STAAR/MAP Reading Achievement and Growth Rates

- **Early Childhood Achievement.** Lower SAISD achievement of young children with IEPs compared to state targets/rates for exiting the program within age expected development for positive social-emotional skills and acquisition and use of knowledge and skills. (Exhibit 3a-b)
- **STAAR SwD Reading Rates.** Lower SAISD achievement rates overall and for SwDs compared to state rates and achievement by student groups. (Exhibit 3c and 3d)
- **MAP SwD Reading 2022-23 Winter Tier 1 Achievement and Growth Rates for SwD.** All achievement area rates for grades 1-10 were below 19 percent and growth rates were below 48 percent. (Exhibit 3e) For **EB SwD**,

SPP 2020-21 SwD Proficiency Rates (Grades 4, 8 and High School)

- **Reading.** SAISD rates ranged from 2.8 percent (grade 4) and 4.1 percent (high school, compared to the state’s respective 11.8 percent and 10.5 percent. (Exhibit 3r) For **EB SwD**,

- **Math.** SAISD rates ranged from 2.5 percent (grade 4) and 2.7 percent (high school, compared to the state's respective 13.3 percent and 10.3 percent. (Exhibit 3s)

2022-23 Winter SwD and EB SwD MAP Scores At or Above 61 Percentile (Considered ACT College Ready)

- **Reading.** Some 7.7 percent of SwD were reported. (Text below Exhibit 3r) For **EB SwD**, 11.3 percent of this group was reported, higher than for all SwD. (See text below Exhibit 3u.)
- **Math.** Some 7.6 percent of SwD were reported. (Text below Exhibit 3s) Math results were not reported for EB SwD.
- **Participation in STAAR-Alt.** The participation rate in 2021-22 was 5 percent, above the state federal maximum rate of 1 percent.

Graduation and Dropout

- **Discrepant Graduation Rates for SwD.** 2020-21 SPP rate of 37.8 percent compared to SAISD data showing 80.7 percent. (Exhibit 3r) It is important for the team to understand the reason for this discrepancy. (Exhibit 3f)
- **IEP Dropout Rate.** Higher SwD dropout rate in 2020-21 than for all SAISD students. (Exhibit 3g)
- **Postsecondary Outcomes.** Compared to TX, lower SwD rates for SAISD one year post high school for higher education, competitive employment, or other education and training program. (Exhibit 3h)

Suspensions of More than 10 Days

- **Out-of-School Suspension.** 2.17 percent of all disability suspensions were for black students, compared to 0.43 percent of all non-disability suspensions. (See text in two sections above Exhibit 3i.)
- **OSS for SwD by Grade.** Large SwD composition of all students with OSSs. (Exhibit 3i)
- **OSS Days of Removal.** Overall higher IEP to no IEP removal rate, and much higher IEP rate for 41-60 school days. (Exhibit 3j)

Educational Environments

- **Discrepant Separate EC Rates.** TEA 2020-21 special education state performance plan (SPP) reported 30.8 percent educated majority of time in regular EC and zero in specialized classes,⁶² compared to SAISD data showing 13.8 percent educated separately. (See text below Exhibit 3b.)
- **Sufficient EB Classrooms.** Number of current EB early childhood classrooms compared to need. (See text below Exhibit 3b.)
- **School-Age Students.** Higher rate (78 percent) of SwD inclusively (general education at

⁶² Retrieved from <https://rptsvr1.tea.texas.gov/idea/index.html>.

least 80 percent of the time) compared to the state and nation, but also higher rate (16 percent) in specialized classes (general education less than 40 percent of the time). (Exhibit 3l)

- **Specialized Programs by Disability.** SAISD disability rates higher than the nation for NC-EC (35 percent, by 20 percentage points), autism (51 percent, 17 points); intellectual disability (62 percent, by 12 points); and OHI (12 percent, by 2 points). (Exhibit 3v)
 - **School Type.** For educating students inclusively SAISD charter campus rates higher than traditional campuses. (Exhibit 3m)
 - **Grade.** Inclusive rates are lowest in EE, kindergarten and 1st grade, and special classes are highest in EE, kindergarten, and grade 1. Grade 12 higher rate due to students remaining in school for transition services. (Exhibit 3n)
 - **Disability by SAISD and Nation.** Compared to the nation, higher SAISD inclusive rates except for noncategorical (NC) EC, which trails the nation's 70 percent rate by 6 percentage points. For specialized classes, higher SAISD rates for NC-EC, autism, and intellectual disability. (Exhibits 3o and 3p)
 - **Race/Ethnicity.** Compared to others, black students comprise smaller portion of students educated inclusively and larger portion of specialized classes. (Exhibit 3q)
 - **BSC Program.** Collect data for this program by race, gender, and grade to determine any areas of concern.
- c. **Data Analysis and Focused Conversations.** Develop user-friendly summary reports for the district's leadership showing data like those reported above and others as appropriate. (Coordinate this activity with Recommendation 1h.) Disaggregate data further, e.g., by charter type and traditional, and by educational environment to better plan and target interventions and supports. Use this information for central, region, and school-based focused conversations and identify areas needing follow-up attention and support.
- d. **Written Expectations.** Plan for the development of written expectations that include practices and procedures to address data referenced in 4b. Include strategies, to support high quality inclusive instruction and improved achievement and positive behavior-SEL outcomes and reduce portion of students taking the STAAR-Alt to better meet the state's 1 percent cap for this assessment. For the noninclusive areas below, which include needs of EB students with disabilities, consider –

Instruction

- **ARD Committee Participants for Emergent Bilingual (EB) Students.** Required LPAC representative (familiar with the student if possible) participation in ARD committee meetings.
- **Inclusive Instruction for Children 3-5 Years of Age.** Measures to increase proportion of young children receiving instruction majority of time in early education classes. Also consider—

- Including information in the [Specially Designed Instruction Inclusion Handbook](#).
- Addressing children with IEPs in the *Always Learning* plan at III.B. for Prekindergarten/Head Start.
- With only four Bilingual early childhood classes in the district, increasing number to meet current and projected need.
- **Students with Particular Disabilities Educated Separately Above National Rates.** Measures required to decrease instructional time in specialized classes by adding supports for students in general education at least 40 to 80 percent of the time.
- **Supplemental Specially Designed Instruction.** For all students not identified as having “the most significant cognitive disabilities,” use of special education to supplement and NOT supplant grade level instruction. As written in the SAISD’s Inclusion and Resource Handbook (page 20), “Specially designed instruction is implemented **in addition to differentiated instruction** to accommodate the student’s access and progress in the general education curriculum. Specially Designed Instruction is **not to be used in place of** differentiated instruction because it is designed to address the individualized needs that exist due to the student’s disability.” (Emphasis added.) (Cross-reference scheduling considerations at Recommendation 1g.)
- **Achievement Growth.** For students taking the STAAR, an improvement goal of more than one year for SwDs to reduce their achievement gap with typical students, and instructional and intervention approaches necessary to meet this goal.⁶³
- **Modified Curriculum for Students Taking the STAAR.** Design of instruction and supports students need to receive meaningful instruction based on a grade level curriculum. (Begin with students at the elementary and middle school levels.) Have conversations with families to ensure they understand the difference between instruction based on curriculum aligned with grade level versus modified standards, any reasons for changing instruction, and implications for post high school outcomes.)
- **ESL and Dual language Instruction.** Parameters for use of dual language instruction for specially designed instruction and related services to the maximum extent feasible, including for students educated in specialized programs.
- **Dyslexia Instruction.** Consistent with TEA guidance, use of individuals with expertise in instructing students with dyslexia regardless of their special education teacher status.⁶⁴
- **Writing Instruction.** Maximizing use of speech-to-text technology and instruction in its use for students having difficulty with writing.⁶⁵

⁶³ The Special Education PIP working draft (December 12, 2022) has a KPI metric measure of one year growth on the STAAR for 80 percent of SwD.

⁶⁴ Retrieved from https://tea.texas.gov/sites/default/files/updates-to-dyslexia-handbook-procedures-concerning-dyslexia-and-related-disorders-dyslexia-handbook_0.pdf.

⁶⁵ See *TEA 2020-21 Accessibility Updates, pp 8-9, and use of accommodation on STAAR*, retrieved from <https://tea.texas.gov/sites/default/files/2020-2021%20STAAR%20Accessibility%20TETN.pdf>.

- **Math Instruction.** Use of an evidence-based intervention as alternative or in addition to “Hand to Mind.”
- **Educator-IA-Related Service Provider Collaboration.** Models for scheduling common planning time for multiple persons working with common student(s).

Positive Behavior/SEL Support

- **Teacher Support.** Timely assistance to teachers and IAs for students with challenging behavior beyond the expertise of available campus and support staff, including students in the ALE and BSC programs.
- **Collaboration** among central office personnel to support teachers and students with significant behavior challenges to reduce fragmented support and siloed assistance.
- **Hospital Transition to Schools.** Parameters for supporting students with severe emotional and mental health impairments released from hospital settings, with expert personnel to support their transition from clinical settings to prior or different campuses.
- **Suspensions.** See *Always Learning* plan at Exhibit 3k and associated comments related to disciplinary removals.
- **High School Behavior Support.** Establishing high school model(s) for students with behavior that significantly interferes with learning across all contexts. Either expanding BSC units at this level or describe an alternative model with smaller class size, co-teaching, use of personnel who can support positive behavior, etc. Use individuals knowledgeable about this population to develop instructional and service parameters.
- **Effective use of IAs** and their collaboration with general and special educators.
- **Sign Language Interpreting Service.** Using contractual services if alternatives are not immediately available for students needing to learn this language and use it to access instruction.
- **Transition Between Grade Levels and Campuses.** Need for campuses to follow the various guidance documents for ECSE to Elementary ([Guidance](#) and [Handbook](#)) and for rising 6th and 9th graders ([Guidance](#)).

See also comments associated with the *Always Learning* plan at Exhibit 3w associated with teaching and learning for students with IEPs.

Secondary Transition

- **CTE Teacher Support.** Sufficient information for CTE teachers to understand how their instruction can meet TELS standards for struggling students.
- **Suitable Location for Adult Years Vocational Program (AYVP).** If at all possible in the future, locate the program in a community setting or community college.
- **Decrease Dropout Rates.** Use of University of Chicago Consortium’s 9th-grade On-Track

measure to decrease high school dropout.⁶⁶

- **Credit Recovery.** For high school students receiving instruction based on a modified curriculum, need for an aligned credit recovery program. (Imagine Edgenuity is aligned with grade level curriculum.)

See also *Always Learning* plan content in Exhibit 3x and associated comments related to work-based learning and internships and need for job coaching for SwDs, especially for those with moderate or severe disabilities.

Family Involvement and Training

- **Central Office Collaboration.** Having disability services parent liaisons, FACE specialists, and family and student support services personnel collaborate to leverage support for families that include SwDs.
- **Disability Services Parent Newsletter.** Continued publication of newsletter and broadly communicate its availability to parents. Publish it in the most common languages spoken by family members.
- **Training.** Broadly communicating to families of SwDs training available for them, with times and expanded access modalities. Survey SEPAC and other organizations and families to identify training of most interest.
- **Information about Importance of Linguistic Support.** For parents of EB students, with knowledgeable individuals, including families with EB SwDs, use of best practices to communicate importance of linguistic support to reduce parent denial of ESL and dual language instruction.
- **SEPAC.** Working with SEPAC to identify ways to broaden participation. Consider having each instructional superintendent (IS) host a special education advisory group composed of one parent from each campus that to the extent possible collectively represent students with various disabilities and needs. Have the groups discuss training preferences and ways in which SAISD could better support them and their children. (These groups would NOT address complaints and concerns about individuals students.) Work with SEPAC to have at least one parent from each region actively participate with SEPAC.
- **Communication Process.** Ways to communicate effectively and promptly with families other than through email and consider issues parents brought to the Council SST's attention that are included in the report at Section III.G.

See also *Always Learning plan* at Exhibit 3y and associated comments related to family involvement.

⁶⁶ Research shows ninth grade students earning less than five credits, more than one F for a semester core course grade, and frequent absences made it difficult to increase grade point averages in subsequent years. [Students on-Track](https://ncs.uchicago.edu/page/ninth-grade-success-and-college-readiness) at the end of freshmen year are three times more likely to graduate from high school. Retrieved from <https://ncs.uchicago.edu/page/ninth-grade-success-and-college-readiness>.

- e. **Material and Human Resources.** To implement the above expectations, consider the material and human resources needed, including those for emergent bilingual students. Consider the practice of other CGCS districts that included a range of technology, such as text to speech and speech to text devices, etc., available for all students.
- f. **Differentiated Professional Learning.** Embed in the professional learning curriculum referenced in Recommendation 1e the content needed to carry out the district's implementation plan addressed below and address the training barriers included in that Recommendation. In addition, address the following, including the particular needs of EB SwDs –
- **Grade Level Curriculum.** Instructional interventions and supports needed for students on the STAAR assessment track to transition to, and benefit from, instruction based on grade level (from modified) curriculum, including students receiving education in BSC classes.
 - **Supplemental (Not Supplanted) Specially Designed Instruction (SDI).** How to arrange for core instruction in general education with effective supplemental SDI through co-teaching or resource classes for students on the STAAR assessment track.
 - **Crisis Prevention Institute (CPI) Training.** Sufficient training classes available to meet staff needs.
 - **Instructional Superintendent and Principal Learning.** Based on processes for identifying critical information IS and principals need to know to oversee special education in their regions and campuses, develop modes for providing in person and written communication. As part of this process, identify mandated training for critical information.
 - **Effective Communication.** Process for determining core knowledge needed by ISs, principals, and campus-based personnel to implement expected practices, and to support SwDs and their families generally. Strongly consider a summer boot camp for these personnel to prepare them for the 2023-24 school year.
 - **Coaching and Modeling.** Maximize use of coaching and modeling for general and special educators, including in BSC programs, to demonstrate evidence-based and best practices, e.g., reducing the escalation of students' aggressive behavior, etc.
 - **Campus Models.** Identify campuses having data showing relatively high student achievement based on grade level standards for various student groups, such as SLD/dyslexia, ALE, BSC, etc. Have a cross-department group of individuals observe their practices, and if worthy share this information during training activities and arrange for other campuses to visit.
- g. **Monitoring and Accountability.** Consider the following –
- **Weekly Data Points of Student Progress.** Develop customized reports for students with dyslexia and other significant reading challenges and EB SwDs to measure progress, e.g., for reading and math progress, failing grades, attendance, etc. Consider how to show data

trends across campuses within regions to identify interventions and supports needed.

- **KPIs.** With representatives from central, regional, and school based leadership teams, review a draft of KPIs for key areas related to such areas as student achievement, behavior-social-emotional wellness, post school outcomes, etc. Specifically, have a KPI showing if students on track to take a STAAR assessment are receiving instruction 1) based on grade level (as opposed to modified) standards and 2) instruction that supplements (not supplants) general education core instruction.
 - **Disaggregate disability data** so broad averages do not mask areas of concern, such as by disability, campus and charter type, educational environment, race/ethnicity, gender; by status [EB, economic disadvantage, foster care status (if sufficient numbers)]; and by combinations of data.
 - **Sort data by district and region.** Consider how campus reports can reasonably show outcomes with numbers fewer than 10. Establish ambitious but reachable targets with implementation of expected practices and report outcomes to central, regional, and school-based leadership teams, as well as others needing the information to improve their work.
- **Baseline Data.** Establish baseline data for SPP areas (educational setting rates, achievement, suspension and expulsion rates, graduation and dropout rates) and other areas deemed important and evaluate intervention effects.
- **Data Collection and Reports.** Design reporting formats that are user friendly and disseminate results on a regular basis to district leadership and board of trustees.
- **Data Checks.** Include above data during data check sessions with district and regional leadership and principals to develop track outcomes and identify follow-up actions needed.
- **Principal Progress Monitoring.** Expect principals to monitor student progress at specified frequencies for, at a minimum, reading, math and office referrals with protocols to show outcomes and follow-up action needed. Have a process for verifying this activity.
- **Fidelity Assessments and Walk-Throughs.** Review current walk-through tools used to monitor instruction to ensure they include the use of interventions in general education, resource, and specialized classes to see how students are being taught and engaged and how consistent instruction is across schools for students with IEPs. Include protocol for SDI that supplements core grade level instruction.

- h. SAISD Implementation Plan and Campus-Based Planning.** Embed in SAISD's implementation plan the areas described above, and others as appropriate, and identify activities for campus-based improvement planning. Have the group review the *Always Learning* plan to identify any areas needing expansion or clarification.

IV. ORGANIZATION AND HUMAN CAPITAL

During our review the Council SST heard many examples of ways central office personnel collaborate to address areas such as curriculum and instruction that is inclusive of special education and EB students. The disability services executive director is a member of the extended cabinet that in January 2023 began to meet monthly. There are weekly collaborative literacy meetings, cross-departmental discussions for math interventions, and monthly conferences that involve disability services with instructional coaches. This section probes deeper and focuses on SAISD organizational components and how they support teaching and learning for SwDs, and student-staff ratios for relevant personnel.

A. Current Assistant Superintendents and Anticipated Instructional Superintendents

SAISD representatives informed the Council SST that in 2023-24 the six assistant superintendent positions will be eliminated, and six new instructional superintendents (IS) will be hired and housed within the academic office. The ISs will supervise their respective principals to implement the academic department's designed curriculum based on the realities of each school. At the time of our review a plan was under review for each IS to have a team composed of two disability services (DS) specialists with specialists from other departments, for a total of 15-17 members.

Also being considered was having the DS specialists report to their respective IS. Currently, the DS executive director meets monthly with the specialists, along with other department administrators and staff. Although a desire was expressed for these meetings to address teaching and learning issues to a greater extent, they were viewed as critical for communicating information about special education and generating feedback. If under IS supervision, each IS would have to approve the DS specialist's participation in these meetings.

Currently, the assistant superintendents meet with the superintendent and deputy superintendents to plan leadership development and instructional related issues. Various concerns were raised that these discussions need to be more inclusive and address issues specific to SwDs. Similar concerns were raised about monthly meetings currently held by assistant superintendents with their respective principals, and there was a desire for active participation by DS personnel.

D. Always Learning Plan: Instructional Superintendents, Disability Services, and PLNs

The *Always Learning* plan includes several provisions related to the reorganization of assistant superintendents into IS networks, and PLNs for principals and assistant principals. Relevant provisions are shown in Exhibit 4a.

Exhibit 4a. Always Learning Plan Related to Instructional Superintendents, Disability Services, and PLNs

IB. SAISD will align central office staff in support of thriving learning environments.

1. Reorganize Senior Team Assistant Superintendents into Instruction Superintendent Networks: Align support by level (ES, Academy, MS, HS); Increase collaboration among Instructional Support Teams (ISTs) to allow instructional superintendents to support instruction.
3. Create Instructional Support Teams (ISTs) that align with Instructional Superintendent Networks. Each team might include Disability Services Specialists, and specialists in math, reading, science, social studies, bilingual, gifted and talented, research, educational technology, etc. Reorganization will align instructional support teams and increase coherence of school services to ensure goals identified in the thriving profiles are met.
5. Reorganize the various curriculum departments under a unified CCMR Umbrella, including Disability Services, CCMR/Post-Secondary Initiatives, Curriculum and Instruction and Assessment, Bilingual/Dual Language, and Learning/Compliance Support Services. Reorganization will align instructional support teams and increase coherence of services to schools.

VI.B. Ensure a rigorous and evidence-based Principal and Assistant Principal development program aligned to the district's equity-centered mission and vision to ensure strong leadership teams in every school.

3. Redesign monthly Professional Learning Network (PLNs) meetings for school Principals and Assistant Principals to ensure a focus on the instructional core. The focus will include, but not be limited to leadership walks, reviewing student work, and equity-centered leadership

The above *Always Learning* content presents several areas that merit further discussion.

I.B.1/3. Instructional Superintendent Teams. As discussed above, these activities have the development of six IA networks, each having a team of specialists representing all areas that impact teaching and learning. This action has the potential of enabling IAs to gain an understanding of their respective campuses and have multi-disciplinary resources who together can respond to and support teaching and learning. The Council SST learned of discussion about the move of two disability services (DS) program specialists to each IA team with direct reports to the special education department. To continue to receive the specialized information and support they need, it will be essential for each IS to collaborate with the special education department to ensure program specialists' training and communication with DS personnel and ISs are effective. ISs should share accountability for campus-based compliance for areas within their control, and include relevant information in learning walks, review of student work, and equity-centered leadership.

Under either line of supervision, it is important that IS planning and interaction with principals inclusively and specifically address teaching and learning for SwDs. To this end, DS specialists need to be active IS team members providing input and feedback within the team and to the IS and DS director.

I.B.5. Unified CCMR Umbrella. Any curriculum department reorganization should address the instruction of SwDs on a path to take the STAAR and current use of modified curricular standards and associated use of SDI that supplants GL core instruction. Also, it must address the curricular needs of students on a path to take the STAAR-alt which is based on state modified achievement

academic standards. Typically, support for teachers instructing these relatively few students remain within the special education organization.

VI.B.3. Principal and Assistant Principal PLNs. SAISD’s plan to implement a rigorous and evidence-based principal and assistant principal development program, with a focus that includes leadership walks, reviewing student work, and equity-centered leadership, is notable. It is essential that PLNs include discussion of current instruction for SwDs on a path to take the STAAR, and extent to which they are educated based on modified curricular standards and SDI supplant (rather than supplement) core instruction. When such practices are identified PLNs need to address how general and special educator instructional practices will transition to those based on GL standards with supplemental SDI and be supported through PD and associated activities.

B. Disability Services Support to Campuses

Focus group participant conversations identified three issues involving disability services personnel support to campus staff. These primarily concerned who to contact for help, timely and proactive interactions, and communication. In addition, concerns were expressed that support was more focused on compliance than teaching and learning strategies. This issue is one that the Council SST has consistently heard during visits to other districts and requires attention. Importantly, disability services staff were well regarded but various challenges, such as changing personnel and covering for campus personnel shortages, were interfering with their support.

Who to Contact. There does not appear to be a clear understanding of who to call within disability services for assistance, resulting in referrals to multiple people for help. For some time, there have been changing roles and responsibilities, resulting from several reorganizations. A major change resulted in having fewer specialists assigned to support each campus and use of coordinators to supervise small groups of specialists. This arrangement involved more personnel layers for campus staff to navigate. Some school personnel reported they relied on the executive director or another director they knew to clarify information and access needed assistance.

Timely Support. Some (but not all) specialists report to campuses on specific days. Although specialists are expected to visit their assigned schools every two weeks, this is not always possible because of the many new teachers who require coaching. Overall, support is viewed as reactive and not proactive, with personnel busy “putting out fires” associated with vacant positions and substitute shortages. Reportedly, there is also some distrust between campus and disability services personnel, with campus-based personnel holding DS responsible for too low allocations to schools. Also, there was consistent feedback from principals that teachers are not being supported, creating pressure on staff. However, feedback also recognized that there are not enough people to support the many campus-based requests for help and making it difficult for staff to respond quickly. A need was expressed for more principal leadership and oversight for special education, which leads to an overreliance on disability services personnel. As noted previously, the presence of small schools contributes to this challenge and makes it more difficult to correct.

Communication. Interviewees also shared their desire for better communication with disability services staff. Information is communicated primarily through written memoranda and with the number of emails principals receive across departments they have difficulty reading and internalizing them all. There were concerns also about the tone of writing, which appears to be demanding and alienating. An example of a written memorandum that did not appear to be communicated broadly concerned the process for placing a student in another school with a more restrictive environment. With several interviewees being unaware of the newly established protocol, there were examples of ARDs making decisions and transferring students without discussion with disability services coordinators or the receiving principal. The new protocol includes a streamlined process that includes a structured conversation to produce an educationally justified ARD decision and communication expectations. There is a strong desire to have written communication accompanied by direct discussion with principals during meetings with their respective supervisors.

C. Disability Services Organization

SAISD provided the Council SST two documents showing the disability services (DS) structure (organizational chart and campus support caseload). Subsequent to the visit, a proposed chart was shared with the team, which is included in the Appendices. Along with prior information, the following appears to be planned. With seven directors directly reporting to the executive director, three are planned to support the instructional superintendents along with identified citywide programs and one each will support four areas: appraisal, speech, 504, and compliance. These are described below with associated Council SST comments.

Three Directors with Instructional Superintendent and Citywide Support

- **Instructional Superintendents Support.** Each director will supervise four specialists, each with two aligned with an IS and their assigned schools. Each DS director and their specialist group will have the support of a coordinator, and two behavior implementation specialists. This structure is well designed to directly support the new ISs and the schools for which they supervise. It will be important for the directors and specialists to establish strong and collaborative relationships with their respective ISs.
- **Citywide Support.** Each of the three directors would supervise a coordinator with oversight for one or more specialized area described below. We note that the BSC program is not under this umbrella and instead is under the appraisal director, with support by a coordinator and two specialists (one each for elementary and secondary schools). Although these individuals may have expertise in this area, their work needs to have a strong instructional focus to support students with low academic achievement. This work may be better aligned with the instructional support by a director associated with IAs and campus support who supervises one of the first two coordinators described below, rather than by the appraisal director.
 - **Curriculum and Instruction (C&I).** This coordinator would supervise 10 areas: adapted physical education, assistive technology, SDI, vision impairments, homebound instruction, regional day school program for the deaf (RDSPD), early childhood, state

assessments, alternative teacher certification partnerships, and Special Olympics. Unlike for the other coordinators below, the title for this coordination area is not easily associated with associated coverage and will require clear communication to the field. This area has two specialists for ECSE and four for C&I, and an RDSPD coordinator and specialist.

- **Alternate Learning Environment (ALE).** This coordinator would supervise three specialists for the ALE program.
- **CCMR and CTE Transition.** This coordinator will oversee three specialists to support nine areas of concentration that primarily address high school activities. Note, each comprehensive high school has allocated a coordinator for 504, special education, and emerging bilingual. Generally, the specialists visit their schools about once every two weeks. In addition, the director supervises six job coaches, four adult and community education teachers, four transition specialists, and two parent/family liaisons.

Four Directors: Appraisal, Speech, 504 or Compliance Support. Each director is responsible for one of these areas of support. The organization of appraisal (except for BSC supervision addressed above), speech, and compliance are typical of other school districts with whom the Council SST has experience. Team comments about the department’s support for 504 is addressed below.

504 and Dyslexia. This director currently supervises one coordinator, one dyslexia instructional specialist and 24 dyslexia program specialists who have provided instruction under the general education umbrella. Specialists having special education certification are allowed to teach SwDs with dyslexia. Otherwise, these students are taught by special educators. According to TEA guidance, dyslexia instruction must be taught by highly trained individuals, such as reading specialists and master reading teachers. General and special educators may provide such instruction if at a minimum they have documented dyslexia training and deliver instruction with fidelity. “A provider of dyslexia instruction does not have to be certified as a special educator for students with IEPs if they are the most appropriate persons to offer dyslexia instruction.”⁶⁷ The Council SST was informed that SAISD’s dyslexia specialists may be renamed “instructional” specialists. Regardless of title, all students but especially SwDs who generally read at levels far below students without IEPs need the TEA description of individuals highly trained in dyslexia methodology. For this purpose, it is less important for teachers to be special education certified than it is for them to be highly trained. For instruction by an individual not special education certified, students’ IEPs may include special education consultation to meet associated IDEA and state requirements. Unless documented, it should not be assumed that a special educator teaching reading to a student with dyslexia is highly trained.

⁶⁷ TEA’s *Procedures Concerning Dyslexia and Related Disorders*, 2021, at page 44, retrieved from <https://tea.texas.gov/sites/default/files/texas-dyslexia-handbook-2021.pdf>.

D. Special Education Instruction and Related Services Personnel

Interviewees addressed various issues that concern personnel who instruct and provide services for SwDs. Also, multiple groups interviewed referred to the lack of transparent funding formulas and district resource allocation. Stakeholders including principals, parents, and district staff indicated they do not understand how resources are allocated and perceive that parent complaints influence the process. Further, parents and administrators remarked that open dialogue and conversation would go a long way to help families understand good faith efforts being made to support all students and give families an opportunity to problem solve major complex challenges alongside district leadership.

Special Education Teachers

For 2022-23, SAISD has used a [Formula Chart](#) to allocate special educators and instructional assistants (IAs) for traditional schools (based on grade bands), academy campuses, and special academic campuses. The chart did not include 1882 chartered schools, which have a different fiscal bases for allocation. SAISD also funds districtwide, flexible positions for special educators and IAs, but additional information about these positions and how they are allocated was not provided. (See Exhibit 4b.)

Exhibit 4b. Special Educator/IA Allocations by Campus Type and Special Education Instruction Model

		Teacher (T) per School	IA per Student or Program
Traditional Elementary	Resource/Inclusion	1-20 students: 1 T/school	15—29 per school: 1 IA
		21-35 students: 2 T/school	
	BSC	1-12 students: 1 T/unit	1-12 per unit
	ALE	1-12 students: 1 T/unit	2 per unit (SOLE 3 per unit)
	ECSE	1-10 students: 1 T/school	1-10 students: 2/unit (self-contained); 1/unit (co-teach)

Building a Unified System Designed to Improve Outcomes for All Students

		Teacher (T) per School	IA per Student or Program
Traditional Middle School	Resource/Inclusion	1-20 students: 1 T/school	1-20 students (1/school); 21-35 (2/school)
	BSC	1-15 students: 1 T/school	2 per unit
	ALE	1-12 students: 1 T/unit	2 per unit; SOLE 3 per unit
Traditional High School	Inclusion	1-25 students: 1 T/school	1-48 students: 2 IAs per school
	ALE	1-12 students: 1 T/unit*	2 IAs per unit; SOLE 3 ALEs per unit
Academy Campuses	Inclusion	1-15 students: 1 T/school	Enrollment of 17 students: 1 IA
	BSC	1-15 students: 1 T/school	2 per unit
	ALE	1-12 students: 1 T/school	2 per unit
	ECSE	1-10 students: 1T/school	1 or 2 IAs per unit
Sp. Academic Campuses**	Inclusion	1-9 students: districtwide staff; 10-25 students (1/school)	10-25 students: 1 IA

*Or more based on need

** Young Women’s Leadership Academy, Travis Early College, St. Philip’s College, and Fox Tech Magnet Schools

The [Formula Chart](#) was not easy to understand, and included various headings with a “Situation Dependent” heading that was not further explained. Exhibit 4b reflects the Council SST’s best understanding of the allocations.

Interviewees raised the following concerns and issues during focus group meetings.

- **Allocation Meetings.** Reportedly, allocation meetings are held with principals, finance, and assistant superintendents; disability services personnel are not involved either before or at the sessions. This process is different from other districts with whom the Council SST has experience, which includes special education administrators who are present during the allocation discussions. Principals can request additional staff, which have sometimes been approved. Concerns were expressed that campus personnel wrongly believed disability services was responsible for holding down budgets with low staffing allocations, and the allocation formula is not widely known.
- **Impact on Campuses.** As discussed in Section I at the beginning of this report, staff shortages, teacher turnover, the lack of substitutes, and large classes became a common interviewee discussion theme. During the Fall of 2022, teacher and IA allocations were based on the largest number of students feasible. No additional special education funding was allocated to cover clerk salaries that doubled (\$8 to \$16). These issues caused problems during the school year when the number of SwDs increased as more students were identified or enrolled in the district. For example, interviewees for one campus reported a caseload of 28 inclusion students with 2 IAs reassigned to cover vacant positions. Another special educator noted that she was assigned to 40 students at a campus with a 20 percent SwD enrollment rate. Reportedly, some specialized program classrooms have had a substitute all year. Filling vacant positions with credentialed teachers for students who are deaf is particularly difficult, as is hiring for the BSC program.
- **Recruitment and Retention.** Human resource personnel have expedited timelines for hiring staff with a goal of fully staffing campuses for 2023-24 by the last day of this school year. Incentives such as a \$3,000 stipend for special educators (compared to \$2,000 for general educators) are being used, and retired educators (with SAISD paying pension contribution requirements) are being recruited. (Additional issues related to salaries for disability services personnel, such as salary “compression,” are discussed further below under Section V’s Fiscal Issues.) Also, human resource and disability services staff are collaborating to support an alternative certification program for IAs and individuals with other degrees. Reportedly, the program has been marginally successful. Part-time employment is currently a flat rate, but the district is moving to a scale that is based on years of service. Against these initiatives, SAISD loses staff during the school year to higher paying districts and/or districts who do not deduct seven percent for social security payments. The recently initiated virtual interview and panel screening has expedited hiring.
- **Staffing for EB students with IEPs.** To increase recruitment and hiring the emergent bilingual unit conducted its own activities, which significantly reduced the number of vacant positions.

With disability services, staff have implemented a program to expand current employees' certification status. While these efforts have improved staffing issues, there is a belief that human capital, along with other department personnel, need to better address root problems impacting staff retention and shortages.

Instructional Assistants

As Exhibit 4b's allocation chart shows, IAs are allocated based on various indicators. If an ARD committee member believes that a student needs individualized support, they are expected to use the 1:1 consideration [process](#) to support educationally justified decision-making. Also, temporary IA support can be used through a crisis substitute allocation for a set period.

Interviewees raised several issues concerning instructional assistants.

- **1:1 IA Process.** Campuses do not comply with the 1:1 consideration process regularly.
- **Training.** There is a great need for IA training during the workday, preferably monthly. Mandated training is limited to that given by the Crisis Prevention Institute (CPI), but limited space is available for those in need. Disability services personnel have offered centralized training, but attendance is based on principal approval. Topics included understanding the IEP, supporting students with challenging behaviors, instructional support strategies, understanding areas of disability, etc. Training has been requested for substitute IAs who have little to no understanding of the work and have not returned to or walked away from assignments.
- **Low Pay.** With a \$16/hour starting pay, IAs earn only \$2/hour more after 15 years of employment. As a result, there is frequent IA turnover due to available higher paying positions in neighboring school districts. SAUSD has taken steps to improve compensation for its employees. In April of this year, the District approved the most substantial increase in pay in over 25 years. This initiative also addresses the issue of compression by offering greater pay raises based on longevity, aiming to recognize and reward experienced educators. Texas currently ranks 45th in per pupil funding and 28th in teacher salaries. These rankings directly impact the District's ability to provide competitive and deserving salaries to its teachers.
- **Practices.** IA substitutes are not allowed to perform certain duties, such as collecting data, which places more stress on special educators who must perform this task. Also, principals have used IAs to substitute for absent or vacant special educators.

Related Services Personnel

A common issue for licensed specialists in school psychology (LSSP) and speech and language pathologists (SLPs) concerns their access to testing materials and protocols, which are currently housed in the WW White gym. The location is not centrally located, and the facility is reportedly in ill-repair. There are also concerns that principals have not regularly provided these personnel access to appropriate and consistent workspaces (which has included closets), printers, and cabinets with locks. Also, the increase referral rates in special education alongside with overall

increase in enrollment has led to LSSP and SLP staff shortages, and large expenditures for contractual services. The pay scale for these staff and others have contributed to these problems. This issue is addressed in more detail under IV.B. Fiscal Issues.

Interviewees also raised the following issues that concern assessment and related services.

- **LSSP Shortages.** LSSPs have been assigned additional campuses, and the psychological services director and coordinator have been required to assist with evaluations and ARD committee meetings, and support campuses. Also, LSSPs are absorbing counseling services due to the shortage of licensed professional counselors (LPCs). Staff turnover and vacancy rates and the influx of new have placed more intensive pressure on staff compared to pre-Covid days.
- **SLP Shortages.** Increased initial speech and language assessments, service eligibility, and more intense student needs have caused caseloads to increase and a decrease in job satisfaction and retention. For 2022-23, SAISD is on trend to increase speech and language services by 140 to 170 students over prior school years. Reportedly, some SPL caseloads are as high as 80. These shortages are similar to those being experienced across the nation and have the following consequences.
 - **Virtual Services.** Twelve contractual SLPs give virtual services only. These personnel who may assess students and supervise assistants have a high turnover rate, as do assistants who are supervised virtually.
 - **Reliance on Assistants.** SAISD has supplemented speech personnel with SLP assistants who cannot evaluate students, make eligibility determinations, recommend services, attend MTSS and ARD meetings, etc. Based on disability services' [Speech Services Allocation](#), 39 percent (30 of 76) of speech personnel are SPL assistants. This percentage is higher than other districts with whom the Council SST has experience. The use of SLP assistants has been necessary to supplement recruitment of SLPs and use of contractual personnel.
 - **Reliance on Contractual Services.** The district also relies on 32.5 contractual speech staff members (42.8 percent comprising 24.5 SPLs and 8 assistants) to supplement current employees. Contractual providers may not be trained on SAISD processes.
- **OT/PT.** There are concerns that PTs rely on IAs to help students get in and out of their wheelchairs. With the turnover of IAs, training issues, and a large number of students in the class, there may be safety concerns.

E. Always Learning Plan Content Related to Special Education and Related Services Personnel

The *Always Learning* plan includes several provisions related to special education and related services personnel, which are shown in Exhibit 4c.

Exhibit 4c. Always Learning Plan Related to Special Education and Related Services Personnel

- I.A.5. Profiles of thriving schools used to ensure students attend high quality schools, determine staffing each February, allocate resources through annual budget process each Spring, determine need for contracted services that support schools with contracts ... inform decisions for the strategic allocation of resources, such as people ..
- V.A. SAISD creates a teacher pipeline ensuring district can recruit and retain highly skilled teachers in every classroom within SAISD.
 - 1. Expand in-district opportunities (CTE P-Tech) giving students a pathway from HS to teacher certification
 - 2. Expand out-of-state college and university partnerships in region with teacher surplus.
- B: Create non-teaching employee pipeline ensuring district can recruit and retain highly skilled employees within every division within SAISD.
 - 2. Partner with one or more universities to develop partnerships to identify, educate, and train specialized staff, such as SLPs, LSSPs, counselors, librarians, etc. Beginning 2023-24 research and develop relationships; 2024-25 develop partnership plan; first cohort Fall 2025
- D: Develop retention model setting district apart from other urban school districts and ensure provision of ongoing growth opportunities and career advancement.
- VI.A.3. Develop onboarding system for all new campus and central office leaders to understanding Board goals, guardrails steeped in equity.
- IX. B: Employee Technology. Shift organizational model for Information Technology to centrally own and manage employee devices for all employees to have appropriate device to meet their instructional and business needs.
 - 4. Create printing model for district.

The above *Always Learning* content presents several areas that merit further discussion.

I.A.5. Profiles of thriving schools. It is not clear if these profiles will take into consideration the needs of SwDs (including those in specialized programs such as ALE and BAC), the increasing number of students requiring specially designed instruction and related services, and that the budgetary process and resource allocations will account for these considerations.

V.A.1 and 2. Teacher Pipeline. The pipeline does not take into consideration the growing need for instructional assistants. Also, pathways could begin in middle schools with future teacher clubs to encourage young students to consider the field of education, including special education. Also, it is not clear where a region exists in this country that has a teacher surplus, especially for special education and related services. A quick Google search revealed no location with teacher surpluses, but instead produced many sites related to teacher (and special education) shortages.

V.B.2. Non-Teaching Employee Pipeline. Given SAISD's shortages for such specialized areas as SLPs, LSSPs, counselors, etc., waiting until 2024-25 to develop partnership plans with universities insufficiently responds to the district's critical shortages and need to expedite action. With a first cohort for Fall 2025, first employees would not be available until several years later.

V.D. Develop Retention Model. Retention strategies relying on personnel growth opportunities and career advancement do not sufficiently address reasons interviewees gave the Council SST for leaving SAISD, such as student behavior, lack of support, staff shortages, etc. These and other job satisfaction issues must be addressed directly and quickly to retain personnel.

VI.A.E. Onboarding All New Campus and Central Office Leaders. In addition to understanding board goals and guardrails, new leaders need to understand the unique issues involving the education and support of SwDs and their responsibilities for including these students in planning and oversight activities. Onboarding for new personnel involved in educating SwDs, including substitutes, contractors, etc. is necessary also for them to understand job expectations and carrying out their essential responsibilities.

F. Comparative Personnel-to-Students with IEP Staffing Ratios

This subsection presents data provided to the Council SST showing FTE figures, including vacancies, for special educators, instructional assistants, speech and language pathologists and assistants (SLPs), licensed specialist in school psychology (LSSP), educational diagnosticians (ED), nurses, occupational therapists (OTs), and physical therapists (PTs). These figures include vacant positions that are addressed in text below. The SST calculated staffing ratios based on the district's number of students with IEPs compared to each FTE figure, and compared SAISD ratios to other urban school districts on which we have data.⁶⁸ (All districts did not report data in each area.) These data are based on full time equivalent (FTE) staff members and not on the number of positions *per se*. Data SAISD provided was not clearly reported, and reflects clarification requested and received. The figures posted below comprise our best understanding of the data.

The data do not give precise comparisons, so results need to be used with caution and *should not be relied upon to make personnel decisions*. Rather, they should be used to investigate the extent to which personnel in areas outside the norm are being used effectively and how they are meeting the needs of students. In addition, district data are not consistently reported (e.g., some districts include contractual personnel and others exclude them) and data are sometimes affected by varying placement types used by school districts. The data may count all students with IEPs, including those placed in charters, agencies, and nonpublic schools, while other districts do not count these. Still, these data are the best available and are useful as a rough guide to staffing ratios. The Appendices has detailed data on each school district.

School District Rankings

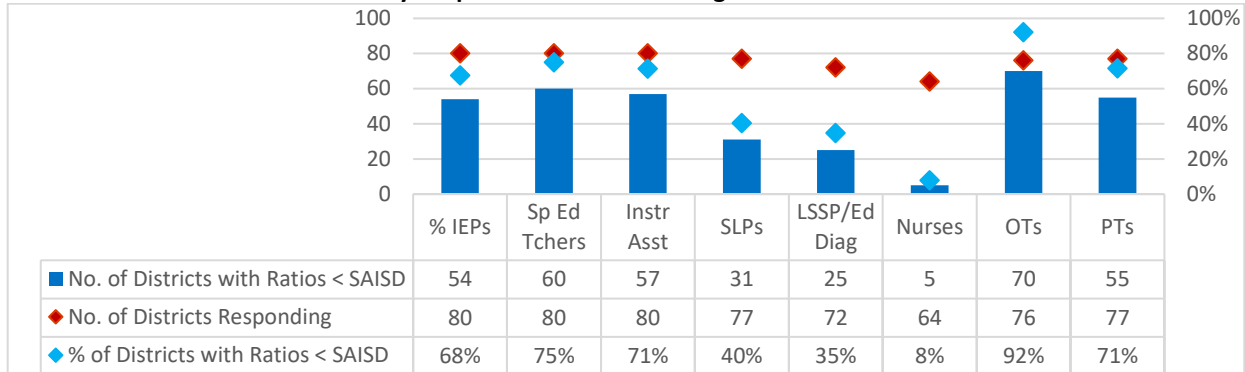
Overall, 68 percent of 80 school districts reported student IEP-to-total enrollment ratios that were smaller than SAISD's rate of 15.5 percent. Meaning, almost 7 of 10 districts had IEP rates smaller than SAISD rates. Also, student-to-personnel ratios below report numbers of students with IEPs compared to FTE numbers by personnel area. As an example, with 6,982 students with IEPs and 399 FTE special educators, there are 17.5 students to each FTE special educator.

Exhibit 4d compares rates of school districts with smaller ratios than SAISD.

⁶⁸ The data were provided by the school districts that responded to a survey conducted by the Urban Special Education Leadership Collaborative; the Council team or members of the team collected the remaining data during district reviews. Although the data was collected over a period of time, typically ratios do not change significantly.

- SAISD Higher Ratios than Most Districts.** Four personnel areas have more than 71 percent of school districts reporting student-to-staff ratios smaller than SAISD, meaning they have fewer students to one FTE in these areas. These areas are occupational therapists (92 percent), special educators (75 percent), and instructional assistants and physical therapists (71 percent, each).
- SAISD Higher Ratios than Few Districts.** Three personnel areas have fewer than 40 percent of districts reporting ratios larger than SAISD. These areas are for SLP and assistants (40 percent), LSSP/EDs (35 percent), and nurses (8 percent).

Exhibit 4d. Number of District Survey Respondents and Percentage with Ratios Smaller than EBR



Special Educators

Exhibit 4e shows district students-to-special education teacher ratios, compared to 80 other urban school districts. Of 399 full-time-equivalent (FTE) special education teaching positions, 22 were vacant (6 percent of allocated positions). This vacancy rate appears to be small compared to the common concern raised by interviewees about staffing shortages. SAISD has an average of 17.5 students with IEPs (including those with speech and language impairments) for every special educator.⁶⁹ This ratio is higher than the 14.1 teacher-student average among all districts on which we have data, SAISD ranks 61st among 80 reporting districts. Thus, 75 percent of districts had smaller numbers of special educators for each student with an IEP than SAISD.

Exhibit 4e. Average Number Students for Each Special Educator

Number of SAISD Staff FTE	399
SAISD Student w/IEP-to-Staff Ratios	17.5:1
All District Average Ratios	14.1:1
Range of All District Ratios	7–37:1
SAISD Ranking Among Districts ⁷⁰	61 st of 80 districts

⁶⁹ These and other ratios are based on allocated personnel positions, which include vacancies. Although special educators for the most part do not instruct students with a speech/language impairment only, as speech/language pathologists are the primary providers, these students were included as students with IEPs among all surveyed districts.

⁷⁰ Ranking begins with districts having a low average number of students to one staff person.

Instructional Assistants

SAISD hires various categories of instructional assistants.

- **Inclusion/GEC IAs** support students educated in general education settings.
- **Alternate Learning Environment (ALE) IAs** support students in low incidence, alternate, and prerequisite standards instruction.
- **Behavior Support Classroom (BSC) IAs** support students in self-contained settings designed to address significant behavioral issues.

IAs also support the regional day school program for the deaf (RDSPD) as interpreters or deaf support specialists (DSS). Commendably, SAISD hires districtwide IAs to flexibly provide support where needed, and mental health assistants to support students with greater needs and in crisis. Mental health assistants are not included in the staffing ratios described below for IAs.

Exhibit 4f shows the district’s students-to-IA ratios, compared to 80 other urban school districts. With 391 FTE positions, SAISD has an average of 17.9 students with IEPs for every IA. This ratio is higher than the 14.6 IA-student average among all districts on which we have data, ranking SAISD as 58th among 80 reporting districts. Some 71 percent of districts have smaller numbers of IAs for each student with an IEP than SAISD. Overall, 17 (4.3 percent) of IA positions are vacant. The IA vacancy rate (14.3 percent) is much higher for BSC programs compared to rates for inclusion, ALE, and ECSE that range from 3.1 percent to 3.9 percent.

Exhibit 4f. Average Number Students for Each Instructional Assistant

Number of IA FTE	391
SAISD IEPs-to-Staff Ratios	17.9:1
All District Average Ratios	14.6:1
Range of All District Ratios	4.3–56:1
SAISD Ranking Among Districts ⁷¹	58 th of 80 districts

Related Services Personnel

Ratios for related services personnel are summarized below and shown in Exhibit 4g.

- **LSSP and Educational Diagnosticians (EDs).** SAISD reported 56 FTE allocated LSSP and ED positions, including 10 (18 percent) vacancies. Also, there are an additional four intern vacancies. (In 2021-22 there were two FTE and one intern vacancies.) Of allocated positions, there was one for every 110 students with IEPs, compared with the all-district average of 174

⁷¹ *Ibid.*

students. SAISD ranked 26 of 72 reporting districts in its number of personnel in this area. Some 35 percent of responding districts had smaller numbers of psychologists for each student with an IEP than SAISD.

- **Speech and Language Pathologist (SLP).** SAISD has 76 FTE speech and language pathologists (SLPs) and assistant allocated positions, including 32.5 (43 percent) vacancies that are being filled by contractual services.⁷² Of allocated positions, there was one SLP for every 92 students with IEPs in SAISD. Compared with the all-district average, SAISD ranked 32 of 77 districts reporting SLP data. Some 40 percent of responding districts had smaller numbers of SLPs for each student with an IEP than SAISD. The district’s mid-district status is likely due to the unusually large composition (39 percent) of SLP assistants (who have limited responsibilities) that are being used to supplement the SLP work force.
- **Nurses.** SAISD reported 96 FTE nurses with 12 (13 percent) vacant positions. Of allocated positions, there was one nurse for every 73.5 students with IEPs in SAISD, compared with the all-district average of 170 students for each nurse. SAISD ranked 7 of 64 reporting districts. Some 8 percent of these districts had fewer nurses for each student with an IEP than SAISD.
- **OTs.** SAISD reported 8 FTE occupational therapists (OT) with no vacant positions. There was one OT for every 1,270 students with IEPs in SAISD, compared with the all-district average of 379 students for each OT. SAISD ranked 71 of 76 districts reporting OT data. Some 92 percent of responding districts had a smaller number of OTs for each student with an IEP than SAISD.
- **PTs.** SAISD reported 5.5 FTE physical therapists (PTs) and one vacant position. There was one PT for every 1,270 students with IEPs in SAISD, compared with the all-district average of 1,010 students. SAISD ranked 56 of 76 districts reporting PT data. Some 71 percent of responding districts had a smaller number of PTs for each student with an IEP than SAISD.

Exhibit 4g. Average Number Students for Each Related Service Area

Related-Services Areas	LSSP/ED	SLPs/Asst	Nurses	OT	PT
Number of FTE Personnel	56	76	95	8	5.5
SAISD S w/ IEPs-to-Staff	124.7:1	54.6:1	73.5:1	872.8:1	1,270:1
All District Average Ratio	174:1	91.9:1	170:1	397:1	1,059:1
All District Ratios Range	26–1,021:1	31–396:1	58-834	64-1685:1	128-2941:1
SAISD Ranking	26 th of 72	32 nd of 77	7 th of 64	71 st of 76	56 th of 76

Exhibits 4c and 4f above do not include the social work area because data given to the Council SST identified only 40 social workers. Reportedly, some campuses have a full or part-time district-funded social worker, and others have social workers provided through Communities in Schools, universities, or another organization. Although SAISD sought to have each campus to have one or two social workers, the applicant pool was too small to fulfill this intention. Given this information, the report of 40 district-employed social workers may be too low.

⁷² Source: More recent [Speech Services Allocation](#) data, which differed from SPL/assistant data provided to the Council SST by district representatives.

Recommendation 5. Maximize interdepartmental collaborative support to school personnel and SwDs.

SAISD has taken a variety of actions to support collaboration between department and units for planning, training, and supporting campuses. Consider the following additional strategies to further leverage districtwide resources and minimize fragmentation for campus personnel and student assistance.

- a. Leadership Team Engagement.** Actively engage the SAISD MTSS leadership team referenced in Recommendation 1a to identify issues 1) that are interfering with student achievement and positive behavior/SEL for SwDs that are beyond the capacity of local school personnel to address; or 2) require systemic efforts to improve. Also address –
- **Communication with Principals and Campus Personnel.** Identify ways disability services (and other offices and departments) can most effectively communicate with principals and campus personnel both in person and through written information to avoid reliance on lengthy and unread documents and email messages.
 - **Principal Oversight.** Parameters of principal oversight for special education and information they need to carry out this responsibility. This provision applies also to 1882 charter schools.
- b. Instructional Superintendents and Team of Specialists.** Identify information each IS needs to supervise principals' administration of special education, including resolution of compliance issues found through data review, complaint findings, etc. As the IS specialist team composition is deliberated (*Always Learning* plan at I.B.3), to avoid unintended consequences consider the following if deciding to have disability service specialists report to ISs.
- **Disability Service Leadership and IA Communication.** At least monthly schedule meetings that include the disability service executive director (ED) and IAs for the ED to share important information and address issues of concern.
 - **Disability Services and Specialists Communication.** Enable disability services specialists to freely communicate with department personnel to problem-solve and receive assistance needed to address campus-based issues.
 - **Training.** Have disability services team members attend In-person training scheduled by the disability services department with the frequency and duration needed to share information, and review data and campus practices to identify trends and cross-region issues, etc., requiring department personnel attention.

Regardless of the reporting structure of disability service specialists, with a neutral facilitator this summer have each IA meet with their principals, specialist teams, and a disability services leader to–

- **Oversight for Special Education.** Reinforce instructional and behavioral expectations along with principal accountability for the success of all students including SwDs.

- **Principal Priority Disability Issues and Potential Solutions.** Address high priority issues impacting the achievement and well-being of SwDs, including hypotheses of root causes and strategies for improvement. Have the facilitator meet with the MTSS leadership team and all IAs to share results. Design follow-up short- and long-term actions for any issues not addressed in this report and recommendations.
- **IA Specialist Team.** Describe campus support for which disability service specialists will be responsible to align expectations. Identify any areas requiring additional training, such as cross-training areas appropriate for other team specialists to broaden their areas of support to general educators. This approach would allow disability service specialists to apply their higher levels of expertise to address more complex issues.
- **Campus Visitation.** With principal input, establish campus schedules for regular and urgent specialist visits that allow for new teacher coaching, changes due to critical needs, and ways to cover for absences, etc.

Also, see the *Always Learning* plan at Exhibit 4a and associated comments regarding IAs, disability services, and PLN inclusion of instruction for SwDs who take the STAAR, including the extent to which current instruction relies on modified curriculum.

Recommendation 6. Improve disability services communication and timely assistance and organize personnel to maximize campus support.

Consider the following activities to improve disability services communication with campus personnel and organize staff to more effectively support campus personnel and SwDs.

- a. Leadership Team Engagement.** Have representatives of the SAISD MTSS leadership team referenced in Recommendation 1a review actions proposed for the activities below.
- b. Communication.** Consider the following –
 - **Functional Diverse Services Directory.** As soon as possible have disability services publish a functional directory showing areas of assistance corresponding staff and emails on its website. For example, identify who to contact for assistance with reading instruction, behavior, BAC, ALE, assistance technology, etc. Note that one person may have several areas of functional responsibilities. Make clear that these contacts are to be used only after campus level approaches and efforts have not been successful. Establish expectations for timely responses. In addition, consider feedback the Council SST received regarding the tone of disability services written communication to campus personnel.
 - **Disability Services Staff Meetings.** Have diverse services leadership team obtain feedback from department personnel to inform the content of their regular meetings.
- c. Reports to the Disability Services Executive Director.** Seven directors report to the ED and would continue under the disability services proposed organizational chart. This proposed reorganization is much better aligned with the department's goals and support to campuses

in cooperation with the newly hired instructional superintendents. Consider the following few suggestions to strengthen this proposal.

- **Directors Associated with ISs.** Have the deputy superintendent review a disability services (DS) proposal for protocol by which the ISs will work with the DS executive director, directors, and specialists to collaboratively oversee special education administration and operations, along with teaching and learning for SwDs, including those who are EB. As part of this proposal, identify training all parties (including other IS team members) need and will receive to carry out their work.
- **BSC Program.** Move the coordinator and two specialists that would support this program from the appraisal director to either the coordinator for curriculum and instruction or with the ALE coordinator with a common director.
- **Curriculum and Instruction.** One coordinator reporting to a director supervises 11 different areas under the heading of Curriculum and Instruction. Consider changing the name of this unit to something more descriptive of the work. In any case, broadly communicate this umbrella of responsibilities.
- **504 and Dyslexia.** Consider renaming this unit, e.g., Intensive Literacy (or Reading) Support and rename the dyslexia program specialists accordingly. Have the name be associated with support for students with dyslexia and others having significant reading underachievement regardless of their status under 504 or IDEA. This change would help to operationalize TEA procedures for use of highly trained individuals, such as reading specialists and master reading teachers for students with dyslexia, including but not limited to those with IEPs.⁷³ Although TEA's guidance pertains to dyslexia, these principles are applicable as well to reasons for other reading difficulties. In addition, consider how special educators can receive training from these reading and literacy specialists and outside trainers to become highly trained teachers of reading.

Recommendation 7. Ensure personnel supporting SwDs are employed and allocated in sufficient numbers and are trained to meet their needs.

This recommendation involves a transparent campus-based allocation process that allows for data to support increased staffing needs, special education related personnel issues impacting SAISD retention and recruitment; staffing ratios necessary to meet student needs; and accelerated recruitment and retention activities.

- a. Leadership Team Engagement.** Have representatives of the SAISD MTSS leadership team referenced in Recommendation 1a engage in the activities below.
- b. Data Review and Focused Conversations.** Have the deputy superintendent meet with representatives from disability services, budget, and human resources to review student-to-

⁷³ TEA's *Procedures Concerning Dyslexia and Related Disorders*, 2021, at page 44, retrieved from <https://tea.texas.gov/sites/default/files/texas-dyslexia-handbook-2021.pdf>.

personnel staffing ratios shown at Exhibits 4d-g. Consider also SAISD staff FTE figures needed to cease reliance on contractual personnel. NOTE: Relatively low or high ratios do not automatically mean that any given area is staffed inappropriately; however, higher than usual comparable ratios should prompt further review, including verification of results with current district data and additional analysis. Areas recommended for review based on ranking among districts and percent of districts with lower ratios are special educators (rank 61st of 80 districts, 75 percent have lower ratios); IAs (rank 58th of 80 districts, 72 percent have lower ratios); OT (rank 72nd of 76 districts, 92 percent have lower ratios); and PT (56th of 76 districts, 71 percent have lower ratios). Based on a full review, consider needed changes for the short and long term. Also, it does not appear that the Council SST received accurate districtwide data of 40 social workers. Review ratios for this group and compare them to ratios in Appendix A to consider if this is an area of concern meriting follow up action.

c. Written Expectations. Consider the following –

- **Staff Allocation Guidance.** Review the special educator and instructional assistant chart shown in Exhibit 4b for clarity and recommendations for revision.
- **Instructional Assistants.** Need for campuses to comply with the 1:1 IA consideration process to prepare for IEP meetings, training IAs need to carry out their expected responsibilities, use of IAs as teacher substitutes, and barriers to substitute IA collection of student data.
- **Data-based Decision-Making.** Establish a collaborative process where school-based staffing decisions occur during meetings that include a disability services representative, principal, IS, budget, and human resources. For each school meeting, have a user-friendly template that migrates IEP data showing the amount of specially designed instruction needed by grade for co-teaching, resource, and specialized program, along with other pertinent information. Use this data to guide discussions for presumed staffing levels based on the allocation chart and allow for other school-based student data that influences these presumptions. Account for students going through the evaluation process and any special education growth projections.

d. Material and Human Resources. Consider the following –

- **Housing of LSSP and SLP materials.** Address the appropriateness of the WW White gym for storing testing materials, the reported lack of locked cabinets, and access to printers and paper.
- **Special Education and Related Services Personnel.** Have the deputy superintendent meet with knowledgeable representatives from disability services, budget, and human resources to review Council SST comments on various *Always Learning* plan content in Exhibit 4c, such as resource allocations, retention, recruitment, onboarding new employees, etc., and associated comments. For example, expedite partnership development with local universities to identify, educate, and train specialized staff to initiate the first cohort by Fall 2024.
- **Task Force.** Have the deputy superintendent (or designee) convene a task force

composed of disability services, EB, human resources, budget, and other representatives to review Exhibits 4d-g data and focus group feedback about staffing shortages and retention and significant impacts on teaching and learning for all students, but especially SWDs and EBs with disabilities. Give the task force data showing current FTE personnel employed or contracted with draft figures needed to reduce and eliminate reliance on contractual personnel.

- e. **Professional Learning.** Evaluate new hire and contractual personnel training for areas of need to carry out their special education responsibilities. Also, increase training for IAs and substitute special education teachers, especially those who are new to teaching.
- f. **Monitoring and Accountability.** Establish personnel employment goals for 2023-24 and meet monthly to monitor growth and adjust recruitment and retention activities as needed. Also, review ARD decision-making for 1:1 instructional assistants to ensure the disability services protocol is followed, and document variations for accountability purposes.
- g. **Broad Communication and Feedback.** For transparency, post on the diverse services website typical staffing allocations that can change based on campus's data-based circumstances.
- h. **SAISD Implementation Plan.** Embed in SAISD's implementation plan areas activities for campus-based planning. Include recruitment and retention activities, and consider resources such as those published by the U.S. Department of Education's *IDEAs that Work to Attract, Prepare, Retain: Effective Personnel for All*,⁷⁴ *Recruiting Special Education Teachers*,⁷⁵ *Recruiting and Retaining Qualified School-based SLPs*,⁷⁶ *NASP: Shortages in School Psychology: Challenges to Meeting the Growing Needs of U.S. Students and Schools*,⁷⁷ etc. Have the task force continue to meet to monitor the success of identified strategies and modify them as needed.

⁷⁴ Retrieved from <https://osepideasthatwork.org/attract-prepare-retain-effective-personnel-all#brief>.

⁷⁵ Retrieved from https://gtlcenter.org/sites/default/files/docs/KeyIssue_RecruitingforSpecialEd.pdf.

⁷⁶ Retrieved from <https://www.asha.org/careers/recruitment/schools/>.

⁷⁷ Retrieved from file:///Users/suegamm/Downloads/School_Psychology_Shortage.pdf.

V. COMPLIANCE, FISCAL ISSUES AND ACCOUNTABILITY

Information in this section addresses issues that include SAISD performance on federal and state special education indicators and compliance requirements, fiscal issues that include personnel compensation and impact of small schools, and shared accountability for teaching and learning.

A. Compliance with Federal and State Special Education Requirements

To support compliance with the myriad of federal and state requirements for special education, disability services has produced numerous documents. SAISD's [ARD Coordination Plan](#) contains extensive guidelines and support for campuses on how to navigate special education processes. Roles and responsibilities are described for various types of personnel prior to, during and after the ARD/IEP meeting. A similar document is also available to staff who are responsible for the implementation of Section 504 services.

TEA Compliance and Performance Protocols

TEA uses two protocols to assess performance and compliance requirements for students with IEPs. The protocols are based on U.S. Department of Education requirements. These are listed below and show SAISD's corresponding status.

Results Driven Accountability (RDA). This [report](#) measures district performance and compliance on various indicators. With 27 total points, SAISD earned a rating of "Needs Assistance." Of special note, no issues were found for compliance indicators, and for valid, reliable, and timely data; uncorrected noncompliance; and financial audits.

Each RDA indicator has a performance level (PL), with "0" as the best score. According to TEA's 2022 special education RDA report for SAISD, based on 2021 data the district earned 27 total points for the following scored indicator numbers. Various other indicators not included are for "report only" and are not scored.

1. **STAAR 3-8 passing** (math, reading, science, and social studies) (12 points, 3 for each)
3. **Year-after-exit special education STAAR 3-8 passing rate** (1 point for math/0 for other three subjects)
4. **STAAR EOC Passing Rate** (11 points: 2 for Algebra 1, and 3 each for biology, U.S. history, and English I/II)
6. **Graduation Rate** (1 point)
7. **Annual Dropout Rate Grades 7-12** (2 points)
9. **Regular EC Program Rate** (0 points), **General Ed \geq 80% Rate** (0 points); **General Ed $<$ 40% Rate** (1 point)
18. **Total Disciplinary Removal Rates** (0 points). (This indicator is not disaggregated by race/ethnicity.)

2022 District Profile for State Performance Plan (SPP) based on 2021 Data. The SPP [Report](#) has 14 indicators, some with several subcomponents designated for compliance or performance. Most of the indicator descriptions and rates that were provided in this report. Of 15 compliance and performance indicators TEA measured against state targets, SAISD met 10 (67 percent).

- **Compliance Indicators.** SAISD met all measured compliance indicators. These were –
 - Suspension and expulsion by race/ethnicity associated with policies, procedures, practices.
 - Disproportionality overall and for six categories by race/ethnicity resulting from inappropriate identification.
 - Timely initial evaluations.
 - Timely early childhood transition.
 - IEPs with specific secondary transition components.
- **Performance Indicators.** Various indicator rates related to performance were reported but not measured against targets due to Covid. These addressed rates for graduation; dropout; statewide assessment participation, proficiency, and gaps between all students and SwDs (grades 4, 8 and high school); educational environments for young and for school-aged students; and parent involvement.

The following two performance indicators were measured against state targets –

- Early childhood outcomes (SAISD met four of six indicators)
- Post-school outcomes (SAISD met none of the three indicators)

According to interviewees, SAISD is not on track to meet the federally required 100 percent compliance rates for timely initial evaluations and for timely transition at age 3 to early childhood from early intervention programs. In addition to staff shortages, accommodating school preferences has made it difficult to schedule ARD meetings.

Compliance Plans

During 2022-23, TEA required SAISD to submit three plans related to special education.

- **Strategic Support Plan.** This plan ([submission](#)) pertained to four areas of improvement: math performance, reading performance, and graduation/dropout. For each of these areas, the plan referred to students' return to in-school learning post pandemic, which resulted in significantly reduced testing results.
 - **Math and Reading.** Strategies for improvement included “[t]raining and professional development to increase capacity for high quality instruction targeting student engagement and *accelerated* learning outcomes.” (Emphasis added.) Also, persons responsible for implementation are disability services personnel (program specialists, coordinators, and directors). Prior sections of this reported noted significant systemic

training barriers and with 80 percent of students receiving at least 80 percent of their education in general education, learning outcomes will not accelerate without the active support of SAISD's general educators at the central, regional and campus levels.

- **Graduation/Dropout.** Strategies to improve graduation/dropout rates included collaboration with SEAD personnel, training to increase knowledge of graduation requirements, and strategic checkpoints of data. The SEAD office was involved in reviewing and revising procedures for interdepartmental collaboration to share student data. Here as above, a broader collaboration of general and special education is needed.
- **Significant Disproportionality Corrective Action Plan (CAP).** TEA's November 11, 2022 notice found SAISD in noncompliance for suspensions totaling 10 days or less for African American SwDs. Corrective action included review and revision of policies and procedures (including operating guidelines and practices), training, and ARD committee meetings to consider student needs related to behaviors resulting in suspension. Here, personnel responsible in addition to disability services included those from integrated student and family support, safe and supportive schools, and campus administrators/principals. Assistant superintendents were not included, and the plan did not include a root cause analysis to inform follow-up action. District representatives explained this finding was based on 2020-21 data when very few students returned to in-person instruction. Data for 2021-22 is not expected to be disproportionate.
- **Present Levels of Academic Achievement and Functional Performance (PLAFFF) CAP.** SAISD responded to the July 29, 2022, notice of noncompliance with actions taken to address the issue: policy and procedure review, professional development, self-monitoring, and ARD committee meetings convened to address noncompliance. When required, ARD committees determined if compensatory services were warranted and acted accordingly.

Due Process and Complaints Filed with TEA

Although informal parent complaints are frequent they have resulted in few impartial hearing requests, and complaints with TEA or the Office for Civil Rights, which is a credit to district personnel. Most informal parent complaints and calls concerned campuses not implementing IEPs, assessment delay after a parent's request or MTSS recommendation, and parent interactions with campus staff.

In 2022-23, one request for an impartial hearing was withdrawn by the parent and disability services resolved a complaint filed with TEA within 24 hours of notice. In 2021-22 two parents requested impartial hearings. These were resolved through settlement agreements with a combined total of \$10,150.00 in attorney fees. One case involved \$2,300 reimbursement for counseling and psychological services and \$7,000 for compensatory services. In the Council SST's experience these cases reflect relatively few numbers. However, attorney fees and other costs, along with the recent U.S. Supreme Court's unanimous decision (allowing parents to file a federal lawsuit without exhausting due process hearing procedures) reflect SAISD's vulnerability when SwDs fail to receive an appropriate education and educational benefit.

Interviewee Feedback

During focus group meetings, participants raised several issues associated with the administration and operation of special education, which impact teaching and learning for SwDs and compliant practices.

- **Principal and Assistant Principal Training.** Three trainings during this year were offered through remote learning, but less than 50 percent of principals attended as of the Council SST's visit. With high personnel turnover, principals rely on campus support staff to a greater extent. There is a belief that this training should be mandated for principals and for assistant principals (who are usually the LEA representative at ARD meetings) given their critical roles and responsibilities and need for this information.
- **Guidance Documents.** Without the benefit of in-person training for new hires and current staff involved in the process of special education, diverse service guidance documents are more difficult to understand.
- **IEP Edit Checks.** Disability service staff are no longer available to read completed IEPs and "redline" technical changes. Reportedly, the district's IEP system does not have a robust set of edit checks that would catch errors prior to finalizing the IEP.
- **Transportation Issues.** Although SAISD has a surplus of bus drivers, some participants referenced late busses and long routes for SwDs. The *Always Learning* plan at VIII.B. has a transportation goal for students to arrive safely, on time, and ready to learn wherever they are traveling. The first activity listed is to weekly review school bus routes for cost efficiencies and effectiveness to maximize student ridership and minimize costs. There is no mention of timely bus pickup/drop-off and reasonable travel length.

B. Fiscal issues

As true for all districts reviewed by the Council SST, funding restraints impact the provision of special education and related services. When the first special education federal law was enacted in 1975, the legislation proposed that federal funding would cover up to 40 percent of instruction and services for students with IEPs. Nationally, IDEA funding covers about 14.7 percent of the cost. As shown in Exhibit 5d further below, SAISD's proportion is closer to 12.2 percent. For FY 2023, Congress approved an overall 20 percent increase in IDEA appropriations. Texas, FFY 2023 to FFY 2024 appropriations are expected to increase by 15.8 percent.⁷⁸ SAISD representatives reported that the district did not receive any increase in IDEA appropriations from TEA at the time of this report. The district is planning to receive a reduction to the FY23 grant.

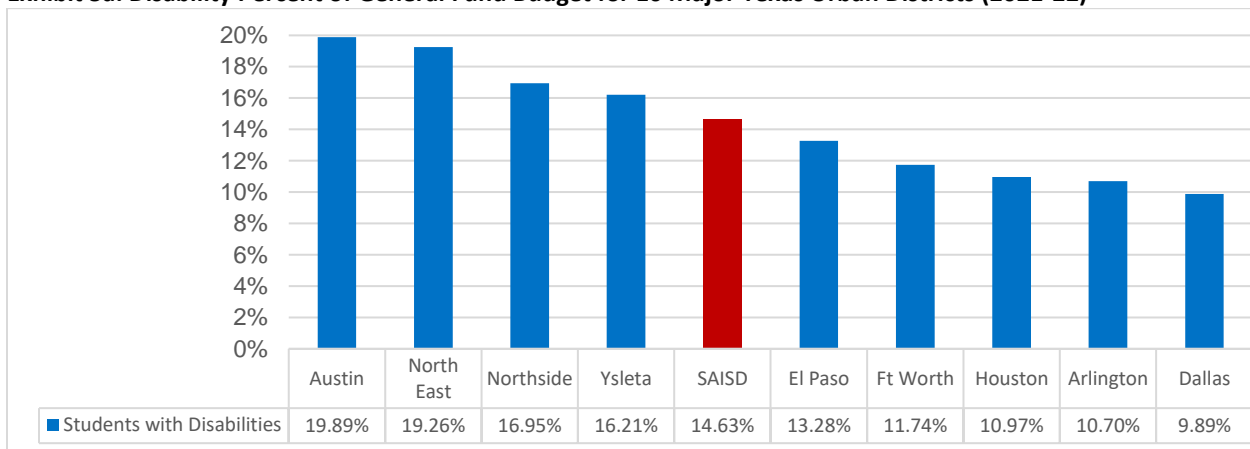
⁷⁸ "More money is not enough: The case for reconsidering federal special education formulas, T. Kolbe, E. Dhuey, and S. M. Dautre, October 3, 2022, retrieved from <https://www.brookings.edu/blog/brown-center-chalkboard/2022/10/03/more-money-is-not-enough-the-case-for-reconsidering-federal-special-education-funding-formulas/>, and U.S. Department of Education Fiscal Years 2022-2024 State Tables, retrieved from <https://www2.ed.gov/about/overview/budget/statetables/index.html>.

The information below includes SAISD’s special education budget compared to other Texas major urban districts. This information shows that special education does not comprise a larger proportion of the district’s budget compared to other school districts.

Special Education Proportion of General Fund by 10 Major Texas Urban Districts (2021-22)

SAISD’s District Budget of July 1, 2022-June 30, 2023,⁷⁹ compares SAISD’s percentage of its 2021-22 general fund budget for SwDs to Texas’s nine other major urban districts. As shown in Exhibit 5a, with SAISD’s 14.63 percent of the total general fund budget for all programs, the district composition is 5.26 percentage points lower than Austin’s (19.89 percent) and 4.74 percentage points higher than Dallas’s (9.89 percent). Of all funding sources the district receives, special education comprises 12.78 percent.

Exhibit 5a. Disability Percent of General Fund Budget for 10 Major Texas Urban Districts (2021-22)



From 2019-20 to 2021-22, the Texas special education general fund budget increased by 0.55 percentage points (12.71 percent to 13.84.)⁸⁰ By comparison, SAISD’s special education budget increased by .05 percentage points (14.68 to 14.63 percent).⁸¹

SAISD Special Education Budget Summary by Function (2018-19 and 2022-23)

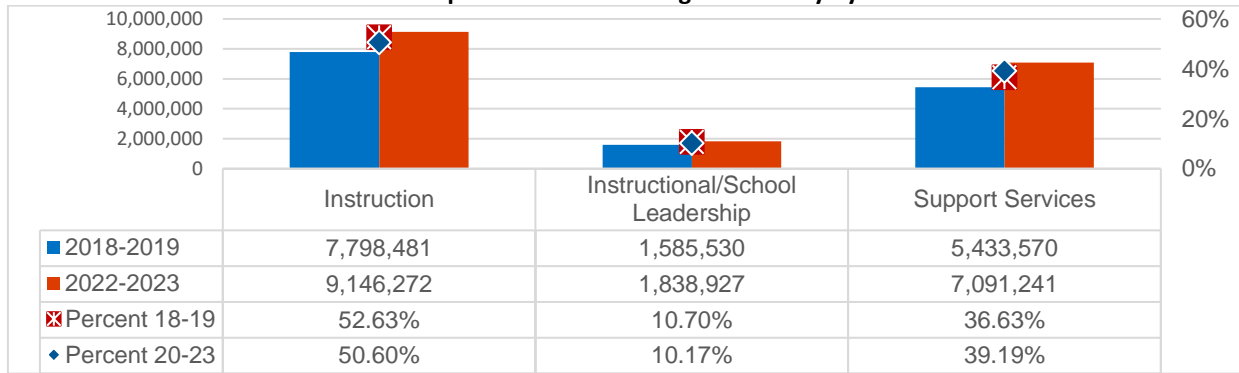
Special education budget [summary](#) slides for 2018-19 and 2021-22 shows funding amounts by function, and a five-year increase of \$3,258,459, or an average \$651,772 per year. During this time, the percentage of funds for instruction decreased by 2.03 percentage points and support services increased by 2.56 percentage points. The proportion of funds for instructional and school leadership remained about the same.

⁷⁹ Retrieved from https://www.saisd.net/upload/page/1564/2022-23_District_Budget_updated.pdf, page 199.

⁸⁰ *Ibid.*, page 201.

⁸¹ *Ibid.*, page 202.

Exhibit 5b. SAISD 2018-19 and 2022-23 Special Education Budget Summary by Function



SAISD 2022-23 General Fund Budget for All Programs and Special Education by Major Objects

Exhibit 5c shows 2022-23 SAISD general fund budget for all programs and for special education by major object areas.⁸² The most notable finding is that payroll comprises 97 percent of the special education budget compared to 83.1 percent for all programs. The special education payroll comprises 14.1 percent of all programs. Overall, special education comprises 12.1 percent of the total general fund budget for all programs.

Exhibit 5c. SAISD General Fund Budget for All Programs and SpEd by Major Objects (2022-23)

	Payroll	Purchased/ Contract Ser	Supplies/ Materials	Other	Cap Outlay	Total
Total All Programs	376,217,215	41,777,969	25,246,054	8,168,176	1,387,911	452,797,325
% of All Programs	83.1%	9.2%	5.6%	1.8%	0.3%	
Special Education	51,528,567	818,512	577,163	91,416	150,000	54,802,749
% of All SpEd	96.9%	1.5%	1.1%	0.2%	0.3%	
SpEd % of Total	13.7%	2.0%	2.3%	1.1%	10.8%	12.1%

SAISD is projected in 2022-23 to receive some \$8,400,000 in Medicaid reimbursement based on eligible special education and related services, which is transferred back to the general fund, as TEA requires. According to an SAISD representative, the receipt of Medicaid reimbursement for special education expenditures is an additional source that allows the district to spend a far greater amount of local budget than the \$38-\$40 million of state aid. This treatment of Medicaid revenue would be comparable across all Texas ISDs.

If credited to special education these funds would reduce the special education total general fund budget to \$46,402,749 and reduce the overall special education proportion to 10.25 percent.

⁸² Ibid at page 101. The area of special education includes students with IEPs, PreK special education, and dyslexia-special education.

While this reduction may be prohibited under maintenance of effort requirements, it shows the relatively small amount of the general fund that special education comprised in 2022-23.

SAISD Total and Special Education Funds by Source (2022-23)

Exhibit 5d shows SAISD’s 2022-23 total and special education funds by local, state, and federal sources.⁸³

- **Local and State Funds.** Local and state comprise 94.2 percent of all allocated funds, with special education funds comprising 15.2 percent of the \$441,297,326 total.
- **Federal Funds.** Federal dollars comprise 5.8 percent of all SAISD funds. Federal special education comprise 18.9 percent of all federal funds.
- **Special Education of All funds.** Of all funds, special education comprises 17.7 percent.⁸⁴

Exhibit 5d. 2022-23 Total Funds and Special Education Funds by Source (Local, State, and Federal)

	A. All Funds Allocated Budget*	% of A	B. Sped Funds	Sped % of B Total	Sped B % of 1A, 2A, and 3A
1. Local	222,642,363	94.2%	67,073,201	15.2%	16.1%
2. State	218,654,963				
3. Federal	27,100,000	5.8%	15,600,000	18.9%	57.6%
Total	468,397,326	100%	82,914,928	100%	17.7%

*Adds projected ESSER and IDEA B revenue and expenditures for 2022-23.

A district representative submitted five years of IDEA funding for the district, which decreased from \$11,459,683 (2017-18) to \$10,621,873 (2021-2022). The loss of \$837,810 averaged \$167,562 per year. IDEA funds decreased even more in 2022-23 (\$266,115), which caused the cancellation of two Collaborative Monitoring and Planning days. This reduction is based on a decrease of overall SAISD enrollment for the year funding was allocated. IDEA funding is not based on the enrollment numbers of SwDs.

Focus Group Participant Feedback

Interviewees shared comments related to administrative access to the special education budget, lack of clarity about the campus-based allocation process, funding for special education high-cost areas, and potential increased funding.

Access to Special Education Budget

In school districts with which the Council SST has experience, special education administrators have access to the full special education budget that is broken down by various categories and

⁸³ This data was provided by email on July 16, 2023, to the Council SST by an SAISD representative.

⁸⁴ The Council SST was informed that it is not believed that the federal total includes the maximum entitled SAISD received in March 2022.

funding sources at the district, regional, and school level. In this way, they can manage the budget and reallocate funds based on need. The Council SST was told the disability services executive director has lacked direct access to the special education budget, including benefits and all funding sources for such areas as special educators, IAs, contractual staff, etc.

According to feedback from an SAISD representative, special education department leadership has 100 percent autonomy over local and federal budget allocations, including the number of personnel allocations, contracted services, non-personnel budget, etc. The only restriction on the budget is that it is expected to stay “budget-neutral” excluding the inflationary impact of pay raises. Department personnel annually, during budget planning season, provides finance a schedule showing all position changes and movement of campus personnel between campuses. This information is the source for campus special education staffing, personnel allocations, contracted services, non-personnel budget, etc.

This feedback, however, does not address the concern that special education leadership does not have direct access to view and analyze the special education budget. Furthermore, the budget process described does not address any flexibility during the school year when student IEP requirements may change during the school year to require additional personnel.

Campus Special Education Personnel Allocation

Reportedly, the special education budget is a mystery for principals with respect to personnel allocation. At meetings that do not include disability service representatives, principals are given staffing figures. Reportedly, this process is not based on a conversation of each schools’ disability population and IEP instructional needs. Our experience with other districts reflects discussions that include the principal, and representatives from special education, budget, and regional leaders. Data is used for decision-making and to resolve disagreements about staffing needs. This process appears to be described but not followed according to SAISD District Budget Guidelines for 2022-23 (page 20) where “All special education staff placements are “situation dependent” and determined by the special education department.” According to an SAISD representative, this designation is because there is no published staffing criteria for these positions because special education administrators must take many criteria into account when making staffing decisions.

The involvement of disability services, in addition to bilingual and early childhood, is also described in SAISD’s document, District Budget July 1, 2022-June 30, 2023.

Bilingual programs, Special Education programs, and Early Childhood programs.

Each department responsible for special populations an opportunity to provide input. Once initial projections are reviewed by the committee then any specific campus programmatic changes are discussed. These changes may include the addition of a dual language program, the addition of new Special Education units, or the reconfiguration of Early Childhood programs for three- and four-year olds. All

known factors which may impact enrollment are discussed to compute a by campus, by grade level, adjustment. In addition, campuses create enrollment plans designed to maintain or increase enrollment. The plans are reviewed by the Office of Enrollment and projections are adjusted based on campuses meeting their enrollment targets.⁸⁵

Also, the SAISD budget document references overall enrollment projections but does not address current and projected increases of SwDs. An SAISD representative indicated that projections include the number of students to be educated in special education self-contained classrooms, which special education leaders use along with other data to make staffing decisions. However, given the need to be “budget-neutral,” there does not appear to be a process for increasing personnel based on need.

Salary Compression

For various issues salary compression impacts a variety of personnel areas. For example, when the Texas legislature mandated teacher raises and SAISD did not act accordingly for non-teaching positions, pay inequity escalated for, e.g., principals and assistant principals, LSSPs, SLPs, educational diagnosticians (EDs), paraprofessionals, dyslexia specialists, etc., which has caused significant concerns. The following examples were brought to the Council SST’s attention.

- **Related Services Personnel.** Employees such as LSSPs, SLPs, and EDs have a \$6,000 salary difference between their 1st and 30th year of employment.
- **Retention Stipends.** These apply to LSSPs and EDs and special educators, but not to SPLs and dyslexia specialists.
- **Dyslexia Specialists.** This group does not receive credit for prior years of teacher employment, and they would earn more if employed in the teaching category. Focus group participants shared their belief that finance refused as too costly a request to adjust the salary of these specialists with a \$1,500 stipend. A finance department representative indicated a lack of knowledge of this request.
- **Instructional Assistants.** Newly hired IAs, with a starting salary of \$16/hour, after 24 years of service earn about \$24/hour.
- **Administrative Salaries for Prior Teachers.** Personnel who leave teaching positions to take administrative positions earn salaries lower than they earned as teachers.

These pay inequities have led to vocal, visible, and frequent complaints during Board of Trustee public testimony and by many to disability service administrators who have no control over this issue.

⁸⁵ Page 221, retrieved from https://www.saisd.net/upload/page/1564/2022-23_District_Budget_updated.pdf.

Special Education High-Cost Areas

As of the end of February 2023 high-cost areas of special education include speech services (over \$3 million for contractual and part-time personnel); evaluation and assessment contractual personnel and testing materials (\$458,000), and additional special educators (\$1 million). Various expenses funded by the federal Covid grant expire at the end of 2023-24, and it is not clear how the activities they support will continue. For example, positions currently funded by ESSR include 17 inclusion teachers and 7 resource teachers and speech contract services.

Potential Source for Increased State Funding

TEA is offering a \$2,000 bonus for CCMR outcomes to districts for each eligible graduate who received special education, in addition to the bonus for such students with an economic disadvantage status. The *Texas Commission on Special Education Funding Report to the 88th Texas Legislature* recommended that the bonus be doubled “for LEAs to focus on activities that prioritize increased outcomes for students who receive special education and related services during their school careers.”⁸⁶ It is especially noteworthy that Texas districts received this outcome bonus for only 850 students statewide. This endeavor is reflected by the *Always Learning* third goal, to improve college readiness outcomes for SwDs.

Campuses with Relatively Few Students and Under Capacity

Various interviewees expressed concerns about SAISD campuses with small schools, which with relatively low numbers of SwD negatively impacts their economy of scale and distribution of special education resources. Also, the provision of initial assessments and related services is more difficult in these schools because of the need to share personnel and accommodate travel times, which could be significant. Reportedly, based on surveys with parents of children who are leaving the district respondents expressed more dissatisfaction when their children were educated at small schools. Furthermore, smaller schools are subsidized with additional funds not available to larger schools so their student needs can be met. Currently, various administrative positions are required for each campus, e.g., assistant principal, etc., and there is a desire to right-size funding and personnel. Under consideration is a move to grant fair proportionate funding to campus administrators and allow them to determine how to best allocate the funds, e.g., principal, assistant principal, librarian, clerical staff, etc.

The Council SST received by campus PEIMS 2023 enrollment, capacity, number of seats available based on capacity, and number of students with IEPs. Data was given for 98 campuses, of which 14 had missing information for various reasons, such as the site is not SAISD owned and capacity could not be determined, appears to be a school within a school, etc. Of the remaining 84 campuses-

⁸⁶ Recommendation 9, retrieved from <https://tea.texas.gov/sites/default/files/texas-commission-on-speciale-ducation-funding.pdf>

Building a Unified System Designed to Improve Outcomes for All Students

- Seven campuses (8 percent) enrolled at least 158 students, with 8 to 30 SwDs.
- Twelve campuses (14 percent) enrolled 159 to 300 students, with 13 to 81 SwDs.
- The remaining 65 campuses (77 percent) enrolled more than 300 students. These included 38 campuses (58 percent) that enrolled 6 to 81 SwDs.

Thus, low campus overall enrollment does not automatically reflect low numbers of SwDs. However, SAISD has an issue with respect to campuses that are underenrolled compared to capacity.

- Seven campuses (with at least 158 students) were 154 to 482 students underenrolled.
- Eleven campuses (with over 158 to 300 students) were 100 to 461 students underenrolled.
- The remaining 65 campuses with 300 or more students were underenrolled by 15 to 1,035 students.

Overall, some 85 campuses enroll 42,154 students, which with 22,589 available seats comprise 65 percent of reported capacities. These data raise the difficult issue of closing schools, which many urban districts face, or identifying revenue raising strategies to supplement the costs of campuses with the most space. SAUSD's demographer's study found that 78 percent of the district's declining enrollment is due to low birth rates and housing prices, but the remaining 22 percent is due to charter schools. The impact of charter schools requires the initiation of courageous conversations.

Always Learning Plan Content Related to Fiscal Issues

The *Always Learning* plan includes content related to fiscal issues, which are shown in Exhibit 5e.

Exhibit 5e. Always Learning Plan Content Related to Fiscal Issues.

- V. SAISD will be a sought after, rewarding place to work where our employees come and stay to perfect their craft as educators, school and district staff, and leaders.
 - D. Develop a retention model that sets the district apart from other urban school districts and ensures the district provides ongoing growth opportunities and career advancement.
 - 1. Convene a Compensation Task Force to establish long term, sustainable strategic objectives that align pre-service and in-service career development opportunities with monetary and non-monetary incentives that will attract, reward, and retain the best employees in ALL areas of SAISD. Review and continue the work done to date to create a performance-based compensation structure for campus administrators (Master Principal Initiative) to recruit and retain highly effective campus leaders.
- VII. SAISD Financial Services & Business Operations division strives for excellence in all functional areas to ensure a solid and sustainable financial foundation for District operations.
 - A. Provide adequate and equitable funding for campus operations to ensure transformational learning for all students.
 - 3. Evaluate district budget by functional category to ensure that budget allocated to direct instructional areas is adequate. Identify consistent gaps in budget allocation (both under and over) and determine areas for further study and analysis by October 2023.

4. Begin the transition from campus staffing guidelines to student-based campus budgets. Review existing campus staffing guidelines and determine, with district engagement, the minimal base campus administrative staffing positions for each school type at minimal enrollment by November 2023. Review existing campus staffing guidelines and determine, with district engagement, the most effective allocation methodology for instructional position allocations for all school types and programs. Discuss the possibility of incorporating Principal autonomy into determining staffing positions. Share recommended revised model incorporating rightsizing and autonomy component with Superintendent for review and input by February 2024. Outcome. Campus staffing guidelines that are (a) aligned with the profiles of a thriving student and a thriving school and (b) tied more directly to student enrollment and campus-generated budget. Greater autonomy for Principals to choose the type of personnel support that will be most effective for accomplishing their campus goals.

C: Guide long-term strategic financial planning to restore spending on instructional initiatives through District's rightsizing.

1. Plan for the upcoming district budgets to ensure that targeted surplus funds are achieved each year to meet the 6-year sustainability plan.

3. Ensure that planned reductions of department-level budgets are realized.

The above *Always Learning* content presents several areas that merit further discussion.

V.D.1. Compensation Task Force. Have the task force include participants representing and aware of disability services issues to address the equity challenges discussed in this report, such as salary compression, stipend availability, credit for prior service, etc.

VII.A.3. Adequate and Equitable Budget Allocation. Disability services' budget allocation for special educator and instructional assistants and related services personnel needs to be carefully reviewed, including associated information contained in this report, to better understand the extent to which adequate staffing exists to "ensure transformational learning" for SwDs.

VII.A.4. Campus Staffing Guidelines to Student-based Campus Budgets. Principal autonomy must include guardrails for SwDs to ensure discretionary action benefits and does not negatively impact their instruction and provision of related services. It is also critical that thriving student and school profiles be sufficiently flexible to recognize the variances of disability-associated individual and programmatic needs that is not easy, or perhaps possible, to describe within a thriving profile. At a minimum, student needs must drive staffing guidelines that are sufficiently flexible to account for unanticipated circumstances. Individual campus decisions should be based on conversations between each principal, supervising instructional superintendent, and disability services and budget representatives using student data as the foundation for decision-making.

VII.C. District Rightsizing. Care must be taken that targeted surplus funds and planned reductions of department-level budgets do not negatively impact teaching and learning of SwDs. Guardrails should be established to help ensure sufficient personnel is available to: support campuses, provide the significant amount of training needed, administer timely evaluations and eligibility decision-making, monitor compliance and essential practices, etc.

Medicaid Reimbursement

Texas is one of 11 states choosing not to expand Medicaid. In all states, Medicaid qualification is based on income, household size, disability, family status, and other factors with eligibility rules that differ between states. In states with expanded Medicaid coverage qualification is based on income alone.⁸⁷ In these states a household income would qualify when below 138 percent of the federal poverty level, or about \$18,754.20 for an individual in a “one-household set up.”⁸⁸

As referenced above, SAISD in 2022-23 is projected to receive \$8.4 million in Medicaid reimbursement. In the past, this amount was higher (about \$13 million) when the district’s student enrollment was higher.

Another major issue impacting Medicaid reimbursement is the end of a three-year period of continuous enrollment that was put into place during Covid. Beginning April 1, 2023, states may begin to conduct full eligibility review of eligibility, and initiate termination proceedings. It is predicted that many families will lose coverage if they do not submit documentation, do not see notices of need to requalify, no longer meet eligibility requirements, etc.

Reportedly, SAISD no longer has a Medicaid outreach program to support Medicaid enrollment for families likely to be eligible. According to an SAISD representative, the district had an outreach program, known as the 100% campaign (the goal of 100% of our eligible families to be on Medicaid), which was funded by the Children's Defense Fund. SAISD did not have funds to continue the program, which was staffed by social work interns, past the funding period. The program did assist some families to sign up for Medicaid; however, not in sufficient numbers to find funds to continue the program. Many eligible families refused to apply then and now, for fear of deportation considerations. Also, parental consent is required for billing and some parents refuse to give consent for a variety of reasons (fear of deportation, upset with special education, receipt of outside services from agencies that mistakenly tell families receiving services at school and from the agency is a conflict, etc.).

It is worth noting that other districts, for example the Chicago Public Schools (CPS), has continued to fund a unit called Connecting Families to Medicaid and SNAP (Supplemental Nutrition Assistance Program) that connects families to free and low-cost food, healthcare, and emergency resources. The unit’s webpage has a highly visible notice to families about their need to renew their Medicaid enrollment, and information about doing so.⁸⁹ An electronic link and phone number is provided for families to request assistance. Also, information about Medicaid, SNAP, and TANF (Temporary Assistance for Needy Families), with a user-friendly format. Although there are substantial differences between Texas and Illinois, we believe it would be useful for district

⁸⁷ Retrieved from <https://www.healthcare.gov/medicaid-chip/medicaid-expansion-and-you/>. A few states use a different income limit.

⁸⁸ Retrieved from <https://www.google.com/search?client=firefox-b-1-d&q=what+is+138+percent+of+poverty+level>.

⁸⁹ Retrieved from <https://www.cps.edu/services-and-supports/health-and-wellness/connecting-to-medicaid-and-snap-cfbu/>.

representatives to reach out to CPS to discuss the work of its unit and whether there are strategies that would be useful to SAISD.

C. Shared Accountability

In the fall of 2011, the Council of the Great City Schools published its report, *Pieces of the Puzzle: Factors in the Improvement of Urban School Districts on the National Assessment of Educational Progress*.⁹⁴ The report summarized research the Council conducted with the American Institutes for Research (AIR) on characteristics of urban school districts that made the greatest academic improvements and had the highest overall performance on the National Assessment of Educational Progress (NAEP). The first characteristic involved a district's clear statement of goals and districtwide accountability for results. These factors help create a culture of shared responsibility for student achievement. Other research has found similar results.⁹⁵ School districts that effectively support school leadership often demonstrate the ability to facilitate learning, address barriers, and govern and manage the district in ways that prioritize good instruction. In pursuing these goals, districts showing improvement have mechanisms for systemic planning, program implementation, evaluation, and accountability.

SAISD's *Always Learning Strategic Plan* makes specific reference to various aspects of accountability that are described in Exhibit 5f. In addition, federal and state special education accountability indicators also apply and should be considered. See IV.A. Compliance with federal and state special education requirements for the state performance plan (SPP) and results driven accountability (RDA).

Exhibit 5f. *Always Learning Plan Content Related to Accountability*

Board Goal 3. Improve college readiness for students with disabilities. Increase TSI College-Ready Standard reading and math meet rates from 4% (August 2022) to 30% (August 2027) for students with IEPs receiving instruction and services in the general education setting.

III.1.6. Partner with Contigo (national expert on CCMR) to refine CCMR data tracking to ... create annual, student-specific reports for families that inform them of their child's college readiness each year from pre-K through grade 12.

X.A: Create new SAISD Office of Strategy to develop, implement, communicate, and progress monitor strategies aligned to board Goals and Guardrails and *Always Learning* plan.

B: Create organizational data reporting and progress monitoring system to improve organizational effectiveness.

1. Implement board data reporting calendar and standard format for presentations on data and progress monitoring at board meetings.
2. Create district-wide scorecard for board Goals and Guardrails, including quantitative and qualitative data showing progress towards our Goals and Guardrails, and protocol for reviewing and acting on findings.
3. Partner with Data Operations and Services Department to build an annual process for creating department goals and department scorecards aligned to board Goals and Guardrails, and district strategic plan and profiles of thriving students, employees and schools described in Component I.A.

4. Redesign district and campus improvement processes for monitoring district and campus-level implementation of district priorities, strategic initiatives, and differentiated support for campuses. Assemble cross-functional District and Campus Advisory Council teams to create a plan for integrating strategy and support by June 2024. Identify one or two strategic initiatives from District Improvement Plan to align across all Campus Improvement Plans (August 2024). Define key metrics aligned to goals, guardrails and strategic plan that will be closely monitored at campus level (October 2024). Develop school and district-level progress monitoring routines and milestones (October 2024). Fully implement school-level continuous improvement cycles (October 2024) and ongoing. Convene quarterly implementation reviews to surface district-trends and system challenges (January 2025).
- XII.B.1. Align School Planning Process to School Improvement processes and 5-year board goals and guardrails, and use the process to determine intensive school actions based on quality seats analysis, with both long-term goals and annual priorities-

The board's goal 3 and *Always Learning* content included in Exhibit 5f have several areas that merit further discussion.

Board Goal 3 indicates that students with IEPs receiving instruction and services in general education setting will increase Texas Success Initiative (TSI) College-Ready Standards meet rates in reading and math meet from **4%** (August 2022) to **30%** (August 2027). The *Always Learning* plan at III.1.6 specifies the refinement of the district's CCMR data tracking "to create annual, student-specific reports for families that inform them of their child's college readiness each year from pre-K through grade 12." Where 96 percent of current SwDs currently do not meet this college-ready standard, a metric aligned with this outcome should begin to monitor students as early as possible in their school career. Further, to provide meaningful information about student progress consider dividing the metric into various performance ranges. Also, it would be necessary to provide user-friendly explanations to teachers, families and students about the meaning of these ranges with respect to the ultimate goal of meeting TSI college-ready standards.

X.A. Office of Strategy. Office personnel need to collaborate with disability services personnel to be aware of relevant data trends aligned for SwDs learning most of the time in general education classes or in specialized programs to develop, implement, communicate, and progress monitor meaningful strategies. This activity should be cross-referenced with Council SST comments to the board's goal 3 above.

X.B.1. Data Reporting and Progress Monitoring to Board. The 2022-23 2nd Quarter Board Updates: Goals and Guardrails at slide 6 reported the following –

- **3.1. % Grad Type Code Assigned.** Goal: 67 percent of juniors and seniors with disabilities projected to earn an advanced diploma. Status: 78 percent at mid-year projected to graduate (based on assigned graduation type code). Yet, based on Texas's SPP, only 37.8 percent of SwDs graduated with a regular diploma in 2022. SAISD should explain the reasons for this discrepancy to the school community, students, and families and also publish and measure the SPP data against state targets.
- **3.2. % Enrolled in Dual Credit.** Goal: 11% of SwDs enrolled in one or more dual credit course. Status: 9% enrolled mid-year. While this data shows access to such courses, it does not report

the extent to which students successfully completed them, which is an important indicator for showing college readiness.

- **3.3. Promotion to Grade 10.** Goal: 78 percent of SwD were promoted from grade 9 in 2022 to grade 10 in 2023 by mid-semester. Status: 83 percent of SwD in 2022 were promoted. Based on interview feedback, promotion could include students' progress on a modified curriculum. The extent to which student progress is based on such a standard should be transparent so that students and families have realistic expectations and understanding of their children's achievement.

It is important to note that these indicators do not show progress of SwDs as they are matriculating through elementary and middle school grades, which provide important benchmarks for the board and others to review to understand students' path to meeting TSI college-ready standards in high school.

X.B.3. Department Goals and Scorecards. For SwDs educated in general education, the disability services department has little control over classroom instruction based on GL curriculum. Principals supervise teaching and learning at the campus level and are largely responsible for training. Furthermore, the department does not control the amount of funds that can be allocated for staff. Departments, such as disability services, should be accountable for those activities over which their personnel have control. Metrics could be developed for activities with shared accountability to incentivize collaborative actions.

X.B.4. District and Campus Improvement. There are many areas in this report that described the need for cross-department collaboration to support teaching and learning. Such areas include campus support for MTSS, reading instruction, and behavior and social-emotional well-being. Limiting collaborative work to one or two strategic initiatives is not sufficiently aggressive to expedite improved achievement for students generally, and especially for SwDs.

XII.B.1. Alignment of School Planning and School Improvement Processes, Goals, and Guardrails. Care must be taken to include in the school improvement process indicators that are sufficiently inclusive for SwDs, including those in specialized programs. Indicators for achievement based on grade level (and alternate standards where appropriate), as well as behavior and social-emotional well-being should be considered when developing long term goals and annual priorities.

Recommendation 8. Improve SAISD's performance and compliance with federal and state indicators and requirements.

Consider the following actions to be aware of and track improvement on federal state performance plan (SPP) indicators and TEA's implementation of federal results driven accountability (RDA) for special education, and to identify complaint and due process trends requiring follow-up action.

- a. **Leadership Team Engagement.** Have representatives of the SAISD MTSS leadership team referenced in Recommendation 1a be engaged in the following activities.
- b. **Data Review and Focused Conversations.** Review data for the most current federal and state SPP and RDA outcomes and discuss areas needing improvement.
- c. **Written Expectations.** Develop written expectations for –
 - Scheduling of ARD meetings with the frequency required to meet required meeting timelines.
 - Training required for central office, ISs, and principals and other campus personnel to accelerate learning outcomes, address disproportionate suspensions for African American SwDs, etc.
 - Collaboration between general, special education, and EB personnel at the central-regional-campus levels to increase graduation rates, decrease dropout rates, and address findings of noncompliance.
- d. **Differentiated Professional Learning.** Embed in the professional learning curriculum referenced in Recommendation 1f content needed to carry out the written expectations of 8d and refer to them in the district’s implementation plan (8g).
- e. **Monitoring and Accountability.** Consider the following-
 - **KPIs.** With representatives from central, regional, and school based leadership teams, include in KPIs district data as measured by federal and state indicators to identify areas of improvement and concern requiring intervention. Where relevant develop hypothesis for root cause analyses and follow-up accordingly with specific actions.
 - **Sort data by district, region, campus, and 1882 and district run charters.** Consider how campus reports can reasonably show outcomes with numbers fewer than 10.
 - **Baseline Data and Targets.** For each indicator use the latest SPP and RDA reports to establish baseline data and targets.
 - **Data Collection and Reports.** Design reporting formats for the above that are user friendly and disseminate results on a regular basis to campus-regional-district and 1882 charter school leadership and board of trustees.
 - **Data Checks.** Include above data during data check sessions with district and regional leadership and principals to develop follow-up actions and track outcomes.
 - **Monitor Implementation Expectations.** Explicitly state monitoring practices that SAISD expects, such as having instructional superintendents review data with their principals to monitor KPI progress. Have a process for verifying this activity.
 - **Due Process and Complaint Findings.** Track the number of due process hearing requests and TEA and OCR complaints resolved with settlement agreements and findings by issue and campus to identify patterns requiring follow-up action.
- f. **Broad Communication and Feedback.** Design protocols for the MTSS Leadership Team to

learn about implementation barriers and act on issues that cannot be resolved without its attention.

- g. SAISD Implementation Plan and Campus-based Planning.** Develop a draft implementation plan that includes the areas above and others as appropriate and identify components required for campus-based improvement planning. In addition –
- **IEP System with Edit Checks.** Release an RFQ for IEP systems having robust edit checks to reduce IEP writing errors and advanced data charting and reporting capabilities.
 - **Transportation.** Consider the *Always Learning* plan at VIII.B. to add an activity for the transportation goal to address timely bus pick up/drop-off and length of travel time.

Recommendation 9. Address various fiscal issues that impact effective operations of special education.

- a. Leadership Team Engagement.** Have representatives of the SAISD MTSS leadership team referenced in Recommendation 1a discuss critical budget issues that are negatively impacting teaching and learning for students with IEPs, including those addressed in the Council SST's report and included below.
- b. Data Review and Focused Conversation.** Review fiscal data in Exhibits 5a-d and associated text, along with other relevant data, to better understand the SAISD budget; special education, dyslexia, and related services spending; and funding source proportions. Ensure budget representatives are involved to address such issues as maintenance of effort and other fiscal issues. Also, take action to ensure disability services leadership has immediate access to the department's budget with the details needed to understand and manage resources.
- c. Written Expectations.** Revise SAISD's *District Budget Guidelines* to –
- **Campus Allocations.** Better articulate typical special education and IA allocations to schools that also include students educated in general education 40 to 80 percent of the time.
 - **Situation Dependent.** Describe the campus-based collaborative process that will be used to address unusual "situation dependent" circumstances.
 - **Projections.** Account for projected changes in special education enrollment overall, and by campus when supported by data. Establish protocol for increasing special education budget allocation when necessary to provide changed circumstances to meet students' IEP requirements.
- d. Human and Material Resources.** To improve retention and recruitment of personnel, potentially increase funds from federal and state sources. To address other material and human resource issues consider –
- Consider the option of offering a stipend for all disability services specialists.
 - Initiating a hybrid schedule for personnel to work away from an SAISD site with evidence

of a half/full day needed to prepare reports/other written information.

- Continuing necessary expenditures that have received federal Covid funding.
- Fiscal investment for services needed to increase students with IEPs to meet CCMR outcomes to qualify for student-based bonuses.
- Contacting the Chicago Public Schools' (CPS) Connecting Families, which helps families with Medicaid/other federal program renewal/enrollment, to consider whether there are strategies used by Connecting Families that may be useful to SAISD.⁹⁰ (Note that a Council SST member can help identify a CPS representative for more information.)

See also the *Always Learning* plan at Exhibit 5e and associated comments related to such areas as retention models, compensation task force, adequate/equitable funding, budget allocation gaps, transition to student-based campus budgets, principal autonomy, staffing guidelines, targeted surplus funds.

- e. **SAISD Implementation Plan.** Embed in SAISD's implementation planning the areas described above/others as appropriate and identify any activities appropriate for any campus plans.

Recommendation 10. Embed in the *Always Learning* plan accountability activities to increase inclusion of SwDs.

As referenced in the *Always Learning* plan, SAISD recognizes the value of shared accountability at the district, regional, and campus levels. The following considerations are offered for plan activities to more consistently address outcomes that are inclusive of students with disabilities.

- a. **Leadership Team Engagement.** Have representatives of the SAISD MTSS leadership team referenced in Recommendation 1a review and discuss the *Always Learning* plan content included in Exhibit 5f and associated comments related to various accountability measures. These comments concern –
- SAISD Board Goal 3
 - Collaboration with disability services
 - Data and progress monitoring reporting to the board
 - Districtwide scorecard for board goals/guardrails
 - Department goals/scorecards
 - District/campus improvement
 - Alignment of school planning/school improvement processes, goals, and guardrails
- b. **SAISD Implementation Plan.** Based on the MTSS Leadership Team discussions, include in SAISD's implementation planning activities associated with Council SST's recommendations and adjustments to the *Always Learning* plan to more inclusively incorporate elements

⁹⁰ Retrieved from <https://www.cps.edu/services-and-supports/health-and-wellness/connecting-to-medicare-and-snap-cfbu/>.

important for teaching/learning for SwD.

RECOMMENDATION MATRICES

The matrix shows various components for the 10 broad recommendations to show how they interrelate. For example, six recommendations refer to written expectations that should be reviewed across activities. Also, references to exhibits and comments related to the *Always Learning* plan are identified.

	Recommendations									
	1. MTSS	2. School Choice	3. Dyslexia/SLD	4. Accelerate Achievement	5. Collaborate Across Departments	6. Disability Services Support	7. Personnel Employment/Allocation	8. Federal/State Indicators & Compliance	9. Fiscal Issues	10. Accountability
MTSS Leadership Team	1a	2a	3a	4a	5a	6a	7a	8a	9a	10a
Data Review			3b	4b			7b	8b	9b	
Written Expectations	1b		3c	4c			7c	8c	9c	
Human/Material Resources	1d		3d	4d			7d		9d	
Professional Learning	1e		3e	4e			7e	8d		

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Data Analysis & Reports	1f		3f	4f						
Monitoring & Accountability	1g		3g	4g			7f	8e	9e	
Broad Communication	1h		3h	4h			7g	8f		
SAISD/Campus-Based Implementation Plans	1i	2f	3i	4i			7h	8g		10b
<i>Always Learning Plan Review</i>	X	X	X	X	X		X	X	X	X

APPENDICES

APPENDIX A. PROPOSED OFFICE OF DISABILITY SERVICES 2023-24

Instructional Sup 1	Instructional Sup 2	Instructional Sup 3	Instructional Sup 4	Instructional Sup 5	Instructional Sup. 6
Executive Director					
Office of Disability Services Director		Office of Disability Services Director		Office of Disability Services Director	
IS 1 Aligned Specialist	IS 2 Aligned Specialist	IS 3 Aligned Specialist	IS 4 Aligned Specialist	IS 5 Aligned Specialist	IS 6 Aligned Specialist
Campus Support Coordinator		Campus Support Coordinator		Campus Support Coordinator	
2 BISPs		2 BISPs		2 BISPs	
Curriculum & Instruction		ALE		CCMR CTE	
C&I Coordinator APE, VI, Homebound, RDSPD, AT, SDI, ECSE, State Assessment, Alternative Teacher Cert. Partnerships, Special Olympics		ALE Coordinator ALE		CCMR and CTE Coordinator AYVP, CCMR, Parent Programs Social Workers, Project Search, Transition, Jail, Advanced Academics, Spec. Pops Coord.	
2 Specialists ECSE	4 Specialists C&I	2 Specialists ALE		2 Specialists	
RDSPD Coordinator (fund 435 & 315)					
RDSPD Specialist (fund 435 & 315)					

Director Appraisal		Director Speech	Director 504	Director Compliance
Coordinator LSSPs, Diagnosticians, Related Services/ OT, PT		Coordinator AT, Speech, Private Schools, IHPT, Child Find, ECECT	Coordinator 504, Dyslexia	Coordinator- Critical Cases Compliance, Cameras in Classroom, RF, Transportation, ESY, HCM, Critical Cases, Enrollment Office
Coordinator: Behavior, MHAs, DWIAs, BCBA, CPI			1 Specialist 504, Dyslexia	2 Specialists Esped
Specialist BSC EL	Specialist BSC SEC			

APPENDIX B. STAFF-TO-STUDENT RATIOS

Incidence of Students with IEPs and Personnel Staffing Ratios*

	% IEPs of All Students		Sp Ed Teachers		Paraeducators		Speech/Lang Pathologists		Psychologist	
	# IEPs	% IEPs	FTE	Ratio	Number	Ratio	FTE	Ratio	FTE	Ratio
Agawam Public Schools	656	15%	39	17	100	7	15	44	3	219
Atlanta Public Schools	4,950	11%	431	11	224	22	65	76	22	225
Albuquerque Public Schl	16,738	20.4%	1217	13.8	1290	12.98	161.5	103.6	97.6**	171.5
Anchorage School Dist	6,779	14.1%	716.8	9.5	786.4	8.6	65	104	44.7	151
Arlington VA Pub Sch	2952	13.9%	343	8.6	262	11	38	77	22	134
Austin Pub S D	9,450	11.7%	802	11.8	912.8	10.4	88.7	107	54.5	173
Baltimore City Publ Sch	12,719	16.5%	999.5	12	429	21	92	140	NA	NA
Baltimore County P Sch	12,127	11.4%	1025.4	11.8	2305	29.6	187.5	92	145.7	87
Boston Public Schools	10,478	19.9%	1293	8.1	1104	9.5	133.4	79	63.6	165
Bellevue, WA SD	1,947	10.3%	82.7	23.5	118.6	16.4	17.4	112	17.3	112.5
Bridgeport, CT	2,618	14.3%	204	13	254	10	25	105	33	79
Buffalo Public Schools	7744	16.6%	753	10.3	439	17.6	109	71	62	125
Cambridge Publ Schools	1,200	20%	176	7	103	12	20	60	22	55
Carpentersville, IL	3,139	15.8%	227	13.8	380	8.3	43	73	28	112
Chicago Public Schools	54,376	13.7%	4,649	11.7	4,228	12.9	390	139	261	208
Cincinnati Pub Schools	8,928	17.4%	457	19.5	801	11.1	62	144	57.7	155
Clark Cty School Dist	40,067	12.5%	3,260	12.3	1,952.8	20.5	390.5	102.6	187.5	214
Cleve Hts- Univ Hts Cty	1,100	18%	83	14	58	19	7	158	8	NA
Cleveland Metropolitan	8,350	21.4%	855	9.8	486	17.2	81	103	82	102
Columbus City, OH	9,727	18.1%	650	15.0	990	9.8	64	152	78	125
Compton CA Unified SD	2981	11.2%	126	28	118	25	5	596	14	213
Dallas, TX	13,470	9.1%	1,078	12.5	868.5	15.5	81	166	37	364
DeKalb 428, IL	879	14.1%	58	15.2	205	4.3	9	98	7.5	117
DesMoines Public Schls	4,854	15.3%	493*	9.8	358.5	13.5	37.3	130	11.5	422
D.C. Public Schools	8,603	18%	669	13	653	14	90	96	78	111
Davenport Comm Sch	1,857	12%	188	10	287	7	NA	NA	NA	NA
Deer Valley Unified SD	3,289	9%	190	18	229	15	49	68	108	31
Denver Public Schools	9,142	12%	592	16	528	18	94	98	98	94
Detroit Public Schools	8,731	16.1%	535.8	16	458	19	98	89	40	218
East Baton Route	3,975	10.3%	523	7.6	422	9.4	74	54	36	110
ESD 112	1,987	14%	55	37	158	13	20	100	12	166
Elgin U-46, IL	5,304	13.1%	252.8	21	288.5	18	71.9	74	20	265
Everett Pub Schools, WA	1,049	17%	74	15	51	21	4	263	5	210
Fort Worth	6,144	8%	520	12	450	14	73	85	31	199
Fresno, CA	8,271	11.2%	509.6	16.2	603.1	13.7	75.5	110	65.7	126
Greenville County, SC	9,894	14%	463	21	376	26	93	106	25	396
Guilford County, SC	10,062	12.8%	575	17.8	448	22.5	127.7	79	52.33	192
Houston Independ SD	15,655	7.3%	3,159	5.0	3,158	5.0	160	98	150**	104
Jackson County FL	2,740	11.3%	193	14.2	89	30.8	25	119	110***	274
Kalamazoo Pub Schools	1,667	14%	70	24	79	22	15	112	NA	NA
Kent, WA Pub Schools	3,069	11.3%	148.7	20.6	318	9.7	32.3	95	25	123
Lake Washington, WA	3,145	11.7%	155.1	20.3	241.5	13.0	32.6	96.5	24.7	127.3
Kyrene School District	1,544	9%	141	11	124	13	27	58	14	111
Lakota Local	1,800	10%	126	15	120	15	39	47	18	100
Los Angeles Unified SD	71,969	13.1%	4900.9	14.7	6019.9	12.0	328.2	219	557	129
Madison, WI Pub Schools	3,808	14.0%	347	10.9	448	8.5	86	44	49	77.7
Marlborough Pub Sch	1,198	25%	141	9	115	11	7	172	4	300
Memphis City	16,637	15%	912	19	655	26	53	314	58	287
Miami-Dade	40,012	11%	2,500	17	1,226	33	209	192	206	195
Milwaukee	16,406	20.9%	1281	13	988	16.6	169	80	136	121
Montgomery Cty Sch	17,226	12%	1,588	11	1,398	13	293	59	97	178
Naperville IL 203	1978	11%	150	13	237	8	33	59	22	90
Nashville	10,141	12.3%	680.5	14.9	594	17.1	109	93	65.5	155
New Bedford	2,655	21%	204	14	205	13	26	103	9	295

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	% IEPs of All Students		Sp Ed Teachers		Paraeducators		Speech/Lang Pathologists		Psychologist	
	# IEPs	% IEPs	FTE	Ratio	Number	Ratio	FTE	Ratio	FTE	Ratio
Oakland Unified SD	5401	14.0%	404	13.4	175	31	47	115	43.5	125
Oak Park Sch Dist 97	875	16%	78	12	90	10	14	63	8	110
Omaha, NE	10,658	17.0%	477	22.3	NA	NA	63.6	168	35.9	297
Orange County, FL	24,385	11.1%	NA	NA	1,165	20.9	202	121	99.5	245
Pinellas County, FL	14,701	13.0%	881	16.7	774	19.0	150	98	79	187
Pittsburgh Pub Schools	4,210	18.1%	308	13.7	263	16	31	136	16	263
Portland Public Schools	7,168	14.5%	282.5	25.4	414	17.3	99.6	72	59.3	121
Providence, RI	4460	18.8%	340	13	339	13	40	111	28	159
Renton, WA	2,108	14.7%	129	16.3	294	7	20	105	15	140
Rochester, NY	5,472	20%	559.2	9.8	428	12.8	148	37	64	85.5
Rockford IL Pub S	4,065	14%	336	12	334	12	49	83	24	169
Round Rock	3,313	8%	369	9	171	20	41	81	29	115
Sacramento	6,519	13.9%	288.1	22.6	246.2	26.5	33	128	50.8	197.5
San Antonio ISD	6,982	15.5%	399	17.5	391	17.9	76	91.9	56	124.7
San Diego Unified SD	16,300	12%	1,100	15	1,300	13	196	84	129	126
Saugus, MA	462	15%	28	17	29	16	6	77	NA	NA
Sch Dist of Philadelphia	33,686	20%	1,535	22	610	56	99	341	100	337
Scottsdale, AZ	2,891	10.9%	246	11.8	230	12.6	39.4	73	28.4	102
Shelby County (Memphis)	14556	12.7%	852	17.1	768	19.0	55	265	60	243
St. Paul, MN	7,152	18.8%	523	13.7	536	13.3	97	74	19	376
St. Paul, MN	7,152	18.8%	523	13.7	536	13.3	97	74	19	376
Stockton, CA	4,436	11.2%	258	17.2	344	12.9	47	94	36	123
Sun Prairie Area S Dist	697	10%	62	12	93	8	14	50	7	100
Tacoma Pub Schl WA	3,894	12%	172.5	23	223	17	33.6	116	27	144
Tucson Unified SD	8,092	14%	409	20	419	20	61	133	54	150
Washoe County Dist, NV	8,551	14%	472	19	325	27	77	112	37	232
Williamson Cty Schl	2,824	9%	213	13	400	7	34	121	23	178
West Aurora, IL SD	1688	13%	120	14	101	17	21	80	13	130
Worcester, MA	5,172	21%	254	21	366	15	38	137	NA	NA
Averages		14.1%		14.1		14.6		118		174

* The Urban Special Education Leadership Collaborative and the Council of the Great City Schools, including its team members who conducted school district special education reviews, collected the data reported in these tables. *The data do not give precise comparisons, so the results need to be used with caution.* District data are not consistently reported (e.g., some districts include contractual personnel and others may exclude them) and are sometimes affected by varying placement types used by a school district. The data may count all students with IEPs, including those placed in charters, agencies, and nonpublic schools. Still, these data are the best available and are useful as a rough guide to staffing ratios.

** Data includes psychologists and educational diagnosticians.

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Ratios for Social Workers, Nurses, OTs & PTs	# IEPs	Social Workers		Nurses (School/RN)		Occupational Therapists		Physical Therapists	
		Number	Ratio	Number	Ratio	Number	Ratio	Number	Ratio
Agawam Pub Schools	656	NA	NA	8	82	3	219	3	219
Anchorage School Dist.	4,950	NA	NA	112.8	60	21.9	309	7.8	869
Albuquerque School District	16,738	98.5	169.9	N/A	N/A	65.3	256	22.7	737
Atlanta Public Schools	6,779	30	165	58	85	12	413	3	1650
Arlington Pub Schools	2952	15	197	*30	98	20	147	6	492
Austin Pub S D	9,450	NA	NA	NA	NA	12.6	751	12	760
Baltimore City Public	12,719	194.1	66	NA	NA	38	335	11	1156
Baltimore County Pub Sc	12,127	48.7	249	179.8	67	65.2	186	27	449
Bellevue, WA SD	11,534	4	487	13.2	148	5.3	367	5.3	367
Boston Public Schools	1,293	52.1	201	128	82	60	175	21	499
Bridgeport, CT	2,618	38	69	28	94	7	374	2	1309
Buffalo Public Schools	7744	48.5	160	NA	NA	75	103	29	267
Cambridge Pub School	1,200	16	75	0	NA	16	75	7	172
Carpentersville	3,139	36.5	86	27.5	114	22	142	6	523
Chicago Pub Schools	54,376	355.7	142	334	151	115	440	35	1445
Cincinnati Pub Sch	8,928	NA	NA	NA	NA	19	470	5	1786
Clark Cty School Dist	40,067	103	389	194.5	206	69.5	577	28	1431
Cleve Hts-UnivHtsCty	1,100	7	158	5	220	2	550	1	1100
Cleveland Metropolitan	37,890	NA	NA	69	113	36	216	9	864
Columbus City, OH	9,727	36	270	103	94	43	226	24	405
Compton CA Unified SD	2981	1	2981	1	2981	1.5	1987	.5	5962
Dallas	13,470	7	1924	NA	NA	14.5	929	4	3368
DeKalb 428, IL	879	8	110	7	126	3.4	256	1.3	204
Des Moines Public Schls	4,854	25.8	188	58.4	83	7	693	4.8	1011
D.C. Public Schools	8,603	90	96	127	68	48	180	16	538
Davenport CommSch	1,857	NA	NA	7	266	NA	NA	NA	NA
Deer Valley Unified SD	3,289	NA	NA	37	89	19	174	4	823
Denver Public Schools	9,142	74	124	77	119	25	366	12	762
Detroit Public Schools	8,731	76	115	38	230	31.6	276	10	873
East Baton Rouge	3975	28	142	26	142	22	181	8	497
Elgin U-46, IL	1,987	56	95	59.5	89	25.2	210	4	1326
ESD 112	5,304	NA	NA	5	398	6	332	3	663
Everett Public Schools	1,049	2	525	11	96	2	525	3	350
Fort Worth	6,144	NA	NA	106	58	16	384	10	615
Fresno, CA	8,271	33.5	247	53.1	1156	3	2757	NA	NA
Greenville County, SC	9,894	20	495	132	75	14	707	4	2574
Guilford County, SC	10,062	75	134	39	258	24.7	407	11	958
Houston Independence SD	15,655	NA	NA	NA	NA	NA	NA	NA	NA
Jackson County, FL	2,740	25	110	BA	NA	6	457	3	913
Kalamazoo Pub	1,667	5	334	2	834	4	417	3	556
Kent, WA Pub Schools	3,069	2.2	NA	NA	NA	12.8	240	4.8	639
Kyrene School District	3,145	NA	NA	4	386	2	772	2	772
Lake Washington SD	1,544	NA	NA	23.6	133	19.3	163	3.3	953
Lakota Local	1,800	6	300	14	129	8	225	2	900
Los Angeles Unified SD	71,969	361.6	199	590.6	122	189.9	379	41	1743
Madison, WI Public Schls	3,808	68	56	38	100	34	112	13	293
Marlborough Public	1,198	9	134	10	120	4	300	2	599
Memphis City	16,637	55	303	68	245	11	1513	9	1849
Miami-Dade	40,012	NA	NA	206	195	65	616	23	1740
Montgomery CtySch	16,406	NA	NA	NA	NA	112	154	61	283
Milwaukee	17,226	140	117	101	162	30	547	13	1262
Naperville, IL 203	1978	27	73	29	68	4	494	3	659
Nashville	10,141	NA	NA	57	178	29.5	344	6	1690
New Bedford	2,655	67	40	30	89	11	242	3	885
North Chicago, IL	875	10	61.4	NA	NA	3.6	170.5	1.6	383.8
Oak Park Sch Dist 97	614	12	73	8	110	7	1125	1	875
Omaha, NE	10,658	37	288	73	146	NA	NA	NA	NA
Orange County, FL	24,385	67	364	108	226	10.5	2322	7	3484

Building a Unified System Designed to Improve Outcomes for All Students

Ratios for Social Workers, Nurses, OTs & PTs	# IEPs	Social Workers		Nurses (School/RN)		Occupational Therapists		Physical Therapists	
		Number	Ratio	Number	Ratio	Number	Ratio	Number	Ratio
Pittsburgh Pub Sch	5401	40	105	40.6	104	7	601	8	526
Portland, OR	7,168	14	512	NA	NA	20.2	355	5.3	1352
Oakland Unified SD	4,210	19	284	30.8	175	12	450	2	2701
Pinellas County, FLa	14,701	108	136	128	115	56	263	23	650
Portland Pub Schools	6,513	10	652	NA	NA	20	326	9	724
Providence	4460	35	127	NA	NA	11.5	388	4.5	991
Renton, WA	2,108	0	NA	17	124	15	141	3	703
Rockford IL Pub S	5,472	26	135	32	127	12.5	325	4.5	903
Rochester, NY	4,065	89	61.5	55.5	98.6	29.2	187.4	11	497.5
Round Rock	3,313	NA	NA	1	NA	10	332	3	1105
Sacramento	6,519	8	NA	5*	NA	2	NA	0	NA
San Antonio ISD	6,982	NA	NA	95	73.5	8	872.8	5.5	1270
San Diego Unified SD	16,300	NA	NA	129	127	40	408	10	1630
Saugus, MA	462	4	116	5	93	2	231	1	462
Schl Dist of Philadelphia	33,686	NA	NA	280	121	20	1685	20	1685
Scottsdale, AZ	2,891	NA	NA	31	93	13.8	210	3.8	761
Seattle, WA	7,281	NA	NA	NA	NA	44	165	11	662
Shelby County (Memphis)	14556	66	221	79	184	29.22	498	12.84	1134
St. Paul Pub Schools	7,152	92	78	33	217	36	199	12	596
Stockton, CA	4,436	3	1479	22.3	199	3	1479	1.6	2773
Sun Prairie Area S Dist	697	8	88	1	NA	5	140	2	349
Tacoma Pub Sch (WA)	3,894	NA	NA	1.2	NA	19	205	11	354
Tucson Unified SD	8,092	26	312	53	153	10	810	4	2023
Washoe Cty Sc Dist	8,551	NA	NA	35	248	12	713	7	1222
West Aurora SD, IL	2,824	19	89	7	241	11	154	7	241
Williamson Cty Schl	1688	NA	NA	37	111	22	187	5	819
Worcester	5,172	NA	NA	NA	NA	12	431	5	1035
Averages			251		170		397		1,059

Building a Unified System Designed to Improve Outcomes for All Students

Percent Students with IEPs of Total Enrollment & Students with IEPs to Staff Ratio in Ascending Order

Rank	% IEPs	Special Educators	Paraeducators	Speech/Lang Pathologists	Psychologists	Social Workers	Nurses	Occupational Therapists	Physical Therapists
1	8%	7	4.3	26	31	26	58	64	128
2	8%	7	5.26	37	55	40	60	75	172
3	9%	7.6	6.3	44	64	56	62	103	219
4	9%	8.6	7	44	77.7	61	64	112	241
5	9%	9	7	47	85.5	67	67	140	283
6	9%	9	7	50	79	69	68	141	293
7	10%	9.1	7	58	90	73	73.5	142	349
8	10%	9.5	7	59	94	73	75	147	350
9	10%	9.8	7.6	59	100	75	82	154	354
10	10%	9.8	8	60	100	78	83	154	367
11	10.3%	10	8	63	102	82	85	163	384
12	10.4%	10	8	65	104	86	89	171	449
13	11%	10	8.3	68	110	88	89	172	462
14	11%	10.3	8.5	71	110	89	89	174	492
15	11%	10.9	8.6	71	110	95	93	180	497
16	11%	11	9.4	73	111	96	93	181	498
17	11.2%	11	9.7	73	111	105	94	186	523
18	11.2%	11	9.7	74	112	115	96	187	526
19	11.3%	11	10	74	113	116	98	18	538
20	11.4%	11.4	10	76	115	124	98.6	199	556
21	12%	11.7	10	77	117	126	100	205	596
22	12%	12	11	78	121	127	104	210	599
23	12%	12	11	79	123	134	110	211	615
24	12%	12	11.1	80	123	135	111	216	620
25	12%	12	12	80	124	140	113	219	639
26	12%	12	12	80	124.7	142	114	225	659
27	12%	12	12.6	81	125	142	115	231	663
28	12.3%	12.3	12.8	83	127	153	119	240	676
29	12.69%	12.5	12.9	84	128	158	119	242	680
30	12.5%	13	12.9	85	129	160	120	256	703
31	12.7%	13	13	89.1	130	165	121	276	724
32	13%	13	13	92	134	170	124	265	737
33	13%	13	13	93	138	188	126	285	761
34	13.1%	13	13	94	140	197	127	300	762
35	13.7%	13	13	95	142	221	127	309	772
36	13.9%	13.4	13	95	144	249	129	325	819
37	14%	13.7	13	96	150	284	133	326	823
38	14%	13.8	13	96.5	151	300	142	332	864
39	14%	14	13	98	154	300	142	332	869
40	14%	14	13	100	155	303	144	344	873
41	14%	14	13.5	102.6	155	312	148	366	875
42	14%	14	14	103	159	334	153	367	885
43	14%	14	14	103.6	166	384	155	374	900
44	14%	14	14	104	169	389	162	384	903
45	14%	14	15	105	171.5	487	163	388	953
46	14%	14.9	15	105	178	495	165	408	991
47	14.1%	15	15	106	178	525	175	413	1011
48	14.1%	15	15	108	179	652	178	417	1079
49	14.7%	15	16	111	195	673	184	424	1035
50	15%	15	16	111	198	705	186	431	1100
51	15%	15.2	16	112	199		195	450	1100
52	15%	15.7	16.4	112	208		199	470	1105
53	15.3%	16.0	16.6	112	210		206	473	1134
54	15.4%	16.3	16.6	114	213		217	474	1222
55	15.5%	16.3	17	115	213.7		230	477	1262

Building a Unified System Designed to Improve Outcomes for All Students

56	16%	17	17	116	218		220	494	1269.5
57	16%	17	17.1	117	219		241	498	1309
Rank	IEPs	Special Educators	Paraeducators	Speech/Lang Pathologists	Psychologists	Social Workers	Nurses	Occupational Therapists	Physical Therapists
58	16.0%	17.0	17.9	121	223		245	518	1326
59	16.2%	17.2	18	127	225		248	525	1491
60	17%	17.1	18	128.3	232		266	547	1488
61	17.4%	17.5	18.4	130	233		386	550	1532
62	17.7%	18	19	133	240		398	577	1553
63	18%	19	19	135	243		700	601	1630
64	18%	19	19.1	136	263		834	616	1650
65	18%	19	20	137	265			644	1685
66	18%	19	20	139	287			693	1690
67	18.1%	19.5	20	140	295			702	1740
68	19%	20	20.5	144	300			713	1786
69	19%	20.3	21	158	319			772	1849
70	19.3%	20.6	21	172	337			810	2023
71	19.4%	21	22	192	376			872.8	2187
72	20%	21	22	218	396			1029	2574
73	20%	21	24	263				1125	2574
74	20%	22	25	265				1479	2701
75	20.4%	22.6	26	314				1513	2773
76	20.5%	23	26	341				1685	2941
77	20.9%	23.5	27	596					
78	21%	24	31						
79	21%	24	33						
80	21%	37	56						
Avg.	14.1%	14.1	14.6	118	174	251	170	397	1,059

APPENDIX C. DATA AND DOCUMENTS REVIEWED

In addition to sources identified throughout the report, the Council SST reviewed the following –

- CGCS Data Request: schools and types; SWD enrollment; disability type; evaluation data; SWD demographics; SWD graduation rates; SWD performance; SWD education setting; specialized programs; staffing models; special education budget; professional development
- San Antonio Independent School District (SAISD) Organizational Charts
- SAISD Administrative Directory
- SAISD Academic Leadership Team (ALT) Contact List
- August 2022 Approved Board Goals
- 2nd Quarter Updates: Goals and Guardrails
- Always Learning Strategic Management Plan
- Special Education PIP
- Dyslexia PIP
- SAISD 1882 Schools and Choice Campus Information
- SAISD Multi-Tiered Systems of Support Manual
- Instructional and Behavior Guidance for Mild to Moderate Students with IEPs
- SAISD Instructional Framework: Elementary Mathematics Resource
- SAISD 2022-23 Inclusion and Resource Handbook
- The SAISD Comprehensive Literacy & Biliteracy Plan
- Specially Designed for Success: Math Instructional Leadership for Students with IEPs
- SAISD Office of Disability Services (ODS) Behavior Support Curriculum (BSC) Rubric
- SAISD ODS TTESS Supplement: Evidence-based Practice in the BSC Setting (2020)
- SAISD ARD/LAPC Meetings: Special Ed & Bilingual/ESL Collaboration
- 2023 EL SPED Denials
- SAISD Supporting Emergent Bilingual Students with IEPs: Guidance for how to conduct LPAC/ARD Meetings and Discuss the Unique Needs of EB Students with IEPs
- Siepmre Bilingue Training
- Summer EB with IEP Training
- Esperanza Training
- Assistive Technology Report
- SAISD Early Childhood Special Education Rising Student Guidance
- SAISD Early Childhood Special Education Program Rising Student Handbook
- Rising 6th or 9th Grade GEC Students with IEPs Guidance
- SAISD 2022-23 Disability Services Professional Development Plan
- ODS Collaborative Training

- PD in Your PJs
- Summer 2022 Conference Proposal
- STAAR Accommodations After School Special
- 2022-23 Cohort: Special Education Teacher Preparation
- Roles and responsibilities of a Case Manager
- New Teacher Academy
- ODS IEP Review of Course Performance Guidance and Form
- ODS Progress Monitoring: Data Collection for IEP Goals and Objectives in eSPED
- Speech Services Schedule
- SAISD Speech Therapy Session Notes Form
- SAISD Speech Services Documentation Form
- SAISD ODS ARD Coordination Plan
- Special Education Staffing Allocations Formula
- SAISD ODS Operating Guidelines for Consideration of One-to-One Support Services
- 2022-23 Occupational Therapist Campus Assignments
- 2022-23 Physical Therapist Campus Assignments
- Psychological Services Staff Roster
- 2022-23 Speech Services Allocations
- Speech Staff Caseloads
- Texas Education Agency (TEA) 2022 Results Driven Accountability Report for SAISD
- TEA Department of Review and Support Strategic Support Plan for SAISD
- SAISD TEA Corrective Action Plan Regarding Significant Disproportionality
- SAISD TEA Corrective Action Plan Regarding PLAAFPs
- 2022 District Profile: State Performance Plan Indicator Targets
- 2022-23 Complaints
- 2021-22 Complaints
- SAISD Special Education Expenditures 5-Yr History
- 2018-2023 SAISD Budget Summary by Function and Campus Level
- OSD Navigation Toolkit
- SAISD OSD Parent Concern Procedures
- SAISD OSD Parent Participation Operating Procedures
- 2022 State Accountability Results
- 2022 Results Driven Accountability
- 2022-23 MAP Results for All Students
- 2022-23 MAP Results for Students with IEPs

- 2022-23 STAAR Results for Students with IEPs
- 2022-23 MAP Reading and Math Data
- AP and Advanced Courses Data
- Student Count by Instructional Setting
- SAISD OSD Dyslexia and Dysgraphia Evaluation and Provision of Services
- SAISD Dyslexia Program Guidance
- Standard Protocol Dyslexia Instruction vs. Specially Designed Instruction
- SAISD Provision of Dyslexia Services
- February 2023 Dyslexia Staffing Caseloads
- 2022-23 Section 504 and Dyslexia Professional Development
- 2021 Dyslexia Handbook
- Section 504 Coordination Plan
- Section 504 Handbook
- 2021-22 Assessment Staff Handbook
- 2022-23 LSSP Assignments
- 2022-23 Fall Assessment Evaluation Totals
- Evaluation Growth
- TEA Speech Legal Framework
- Speech/Language Evaluation Totals
- SAISD OSD CTE and Advanced Academics: Guidance for Working with Students with IEPs
- SPED Semester Advanced Courses
- SAISD Specially Designed Instruction and Advanced Academics
- CTE Representation at SAISD ARDs
- TEA Industry-Based Certification Accommodation Chart
- SAISD Student Code of Conduct
- SAISD Dashboard
- Special Education Vacancies as of February 16, 2023

APPENDIX D. INDIVIDUALS INTERVIEWED AND AGENDA

The following individuals were invited to meet with The Council of the Great City Schools' Strategic Support Team. For some sessions all invited individuals did not attend and may have included additional participants.

Monday, March 6th *Breakfast served beginning at 7:30 A.M.

8:00 - 8:45 A.M.	Patti Salzmann, Deputy Superintendent and CAO
8:45 - 9:30 A.M.	Kristen Williams, Executive Director for Disability Services
9:30 - 10:15 A.M.	School Leadership Eric Wicker. Asst. Superintendent Jonelda De Leon. Asst. Superintendent Angelica Romero. Asst. Superintendent
10:25 - 10:55 A.M.	Academics Johnny Vahalik Asst. Superintendent Kendra Doyle Sr. Executive Director of CIA Stacey Knudson Director of Elem Math Janet Hester Director of Sec ELAR Veronica Hellamns Director of Elem ELAR Brooke Velasquez Director of Science
10:55 -11:30 A.M.	Dual Language, ESL, & Migrant Esme Alday Executive Director Gala Friese Director of Compliance Luz Martin. Coordinator for Welcome Center Kelly Manuel Director of CBLI
11:30 -11:50 A.M.	Office of Innovation John Norman. Districtwide. Chief of Innovation

11:50A.M.-12:10
P.M.

Career & Technical Education

Johnny Vahalik	Asst. Superintendent
Liz Ozuna	Executive Director
Christina Mank-Allen	Director
Dustin Nieto	Coordinator Post-Secondary Initiatives
Fred Losoya	Specialist for CTE Special Pops

12:10 - 12:30 P.M.

Learning/Compliance Support/Early Childhood

Agnes Gonzalez	Director Learning Compliance Support
Tracie Kuenzi	Coordinator for State Comp Education
Sandra Brown	Coordinator ECE

1:00 - 1:45 P.M.

Special Education Program Specialists

Andrea Holguin	Campus Support
Misty Reynolds	Campus Support
Stephanie Blackman Ybarra	Campus Support
Mary Garcia	Campus Support
Jennifer Montgomery	BSC
Tim Larabee	BSC
Gary Mulroy	ALE
Jennifer Otto	ALE
Clarissa Riojas	APE
Nicole O'Connor	ECSE

1:45 - 2:15 P.M.

Planning & Budget

Dottie Carreon	Chief Financial Officer
Velinda Salas	Director
D'Ann Holmes	Asst. Director
Debbie Leija	Executive Director
Rosie Alvarado	Sr. Budget Analyst for Special Ed
Augustine Morales	Sr. Budget Specialist

	Angie Ramirez	Sr. Budget Analyst	
2:15 - 2:45 P.M.	Dyslexia & §504		
	Julie Ann Gonzalez	Director	
	Laura Hinojosa	Coordinator for Dyslexia	
	Azael Rodriguez	Dyslexia Instructional Specialist	
2:55 - 3:15 P.M.	Operations & Data		
	Dr. Ken Thompson	Deputy Supt of Operations	
	Toni Thompson	Chief of Staff	
	Theresa Urrabazo	Chief of Data Operations	
3:15 - 4:00 P.M.	Dyslexia Program Specialists		
	Linda Leung	Rogers	Split Funded MS
	Shana Lawler	Forbes/Briscoe	DPS
	Michelle Augello	Arnold, Maverick, Baskin	DPS
	Adriana Mayces	Collins Garden, Storm, Kelley	DPS
	Adriana Barrera	Crockett/Irving Dual Lang	DPS
		Highland Hills, Riverside Park,	
	Priscilla Gallardo	Miller, Schenck	DPS
	Amy Arespe	Lamar	DPS
	Alicia Joseph	ALA @Fox Tech, Fox Tech, Cast Tech	CALT
4:00 - 5:00 P.M.	Principals		
	Rose Englebrecht	Hot Wells MS	
	Jennifer Benavides	Fox Tech HS	
	Moises Ortiz	Lanier HS	
	Sonya Mora	Cameron & Gates ES (1882)	
	Melody Clay	Japhet Academy	
	Gary Pollock	Estrada DAEP	
	Olivia Almanza	Irving DL Academy	
	Carol Velazquez	Harris MS	
	Gregorio Velazquez	Tynan ECE	
	Sharene Dixon	Sam Houston HS	

Tuesday, March 7th

8:00 - 8:45 A.M.

Psychological and Speech Services

Evelyn Mendez	Behavior Analyst/BCBA
Elizabeth Rios	LSSP Coordinator
Jhoana Parks	LSSP
Yvonne Mahone	Diag
Angelina Olivares	Diag
April Duvall	SLP
Paula Fran Stroman	SLP
Valerie Hernandez	SLP-A
Thelma Padilla	Social Worker
Gloria Davis	Nurse
Kris Navarro	Assistive Technology
Chris Quintanilla	OT/ PT

8:45 - 9:15 A.M.

Office of Access & Enrollment

Beth Jones	Asst. Superintendent
Diane Fernandez	Executive Director for OAES

9:15 - 10:15 A.M.

Special Education Teachers

Sandra Cox	Wilson	Elem Inclusion/Resource
Lauren Tristan	Harris	MS Inclusion/Resource
Julian Mondragon	Healy Murphy	HS Inclusion/Resource
Heather Pauly	JT Brackenridge	BSC Elementary
Ugonna Onyekwere	Schenck	ACE Teacher
Drew Barton	Margil	ALE Elementary
Rachel Arias	Poe	ALE MS
Jessica Ballard	Adv. Learning Academy	

10:25 - 10:50 A.M.

Medicaid

Kirstin Langreich	Clinical Coordinator
Suky Estala	Reimbursement Coordinator
Erica Reyna	Reimbursement Coordinator
Maria Torres	Medicaid PT Administrator
Stacy Santos	Medicaid

10:50 - 11:35 A.M.

Coordinators & Specialists

Lisa Roen	Self-Contained	Coordinator
Traci Harris	Campus Support	Coordinator
Mishaleen Allen	Campus Support	Coordinator
Cindy Gomez	Campus Support	Coordinator
Isaac Tabares	Beh Coach Model	MHA
Elvira Briseno	Beh Coach Model	MHA
John Rice	IBSC model	MHA
Tywanda Farmer	BCM	Behavior Specialist
Gabriel Garcia	BCM	Behavior Specialist
Stephanie Baker	BCM	Behavior Specialist
Janel Cowen	Districtwide	Director

11:35 A.M. - 12:05 P.M.

Organizational Learning

Agnes Gonzalez	Director
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12:05 - 12:35 P.M.

SEAD & Restorative Practices

Beth Jones	Asst. Superintendent
Tiffany Venzor	Director for Counseling
Darnell White	Executive Director for School Safety
Victoria Bustos	Executive Director for Counseling
Estella Garza	Director for Family Support Services

1:05 - 1:50 P.M. **Specially Designed Instruction/Homebound/ECSE/AI/VI/RDSPD**

Casie Bland	Director
Allegra Montemayor	Specialist
Mary Morton Boggess	Specialist
Danny Ditto	Coordinator for SDI & Homebound
Sandee Alcazar	Coordinator for DHH & RDSPD

1:50 - 2:35 P.M. **Transition, Vocational, & Parent Programs**

Ana Guerra	Parent Programs	Parent Liasion
Joyce Segundo	Parent Programs	Parent Liasion
Rufino Arenas	Transition/Sec Support	Transition Specialist
Yvonne Cadena	Transition/Sec Support	Transition Specialist
Geralyn Martinez	AYVP	AYVP Teacher
Monica Villarreal	AYVP	AYVP Teacher
Mary Garcia	Project SEARCH	Project SEARCH Teacher
David DeHoyos	AYVP	Job Coach
Baldemar Benavides	Project SEARCH	Job Coach
Kristi Jordan	Districtwide	Coordinator

2:45 - 3:30 P.M. **Directors Aguilar, Redding, & Brayden**

Jason Brayden	Director
Aaron Aguilar	Director
Leslie Redding	Director

3:30 - 4:30 P.M. **Parents**

Henery Gonzales	YWLA, YMLA	SEPAC
Rebecca McMains	Lamar	Parent

Wednesday, March 8th

8:00 - 9:00 A.M.

General Education Teachers

Dawn Silva	Knox	EC/PreK/HS
Katrina Davis	Davis	MS
AnnaMarie Ramsey	Edison	HS
Jennifer Casanova	Fox Tech	Academy
LeAnn Dinsdale	Brackenridge	CTE
Emily Franco	Whittier	Academy

9:00 - 9:45 A.M.

Paraprofessionals

Monica Calvario	Margil	ALE ES
D'andrea Harkless	Sam Houston	ALE HS
Rebecca Paloma Davis		DWIA
Sulema Castillo		DWIA

9:45 - 10:15 A.M.

Compliance

Gina M. Flores	Director
Jennifer Nuckles	Compliance Specialist
Jennifer Grota	Compliance Specialist

10:25 - 10:55 A.M.

Committee Debrief Preparation – Patti Salzmann

10:55 - 11:20 A.M.

Human Resources

Chris Martinez	Chief of Human Capital Mgmt.
Jill Rhodes-Pruin	Deputy Chief of HCM
Traci Smith	Director for Strategic Staffing

11:30 A.M. - 12:00 P.M.

Zoom with TEA Representative Christy Lewis

1:00 - 2:00 P.M.

Debrief with Executive Team

2:00 - 3:00 P.M.

Debrief with Special Education Director Team

APPENDIX E. STRATEGIC SUPPORT TEAM MEMBERS

Dr. Ray Hart, Executive Director, Council of the Great City Schools: Dr. Raymond C. Hart is the Executive Director of the Council of the Great City Schools. Hart, who has more than 30 years of experience in research and evaluation, was previously the Director of Research for the Council, and his work has spanned policy areas such as post-secondary success and college readiness, professional learning communities and school improvement, teacher effectiveness and value-added analysis, early childhood education, and adult and workforce literacy. He has worked with clients from a number of federal agencies, including the U.S. Department of Education, the U.S. Department of Housing and Urban Development, the U.S. Department of State, the National Science Foundation, and many state and local departments of education. Hart recently led the Analytic Technical Support Task for the Regional Educational Laboratory – Mid Atlantic. He served as the Executive Director of Research, Planning and Accountability for Atlanta Public Schools, President and CEO of RS Hart and Partners, which is an evaluation and assessment consulting firm, and an Assistant Professor of Research, Measurement, and Statistics at Georgia State University. Prior to his work as a consultant, Hart served as the Director of the Bureau of Research Training and Services at Kent State University. His career began in 1989 as a program director for African American, Hispanic, and Native American students in Engineering and Science.

Christina Foti, Chief of Special Education, Division of Specialized Instruction and Student Support, NYC Department of Education: Christina Foti serves as the Chief of Special Education for NYC Public Schools overseeing citywide special education supports and implementation. The work of her division reaches over 300,000 preschool and school-aged students and their families in various schools within the district, charter, and nonpublic sectors. Her vision in the development and expansion of inclusive programs for students with IEPs has brought national and international recognition to New York City based programs. Christina has served as a Deputy Chief Academic Officer, Principal, Assistant Principal, School-based Professional Development Coach, and teacher.

Jessica Baldwin, Interim Deputy Chief of Student Services, Cleveland Metropolitan School District (CMSD): In this role, Jessica oversees a number of student-facing supports that are both universal and individualized: social-emotional learning, integrated health, special education, and multilingual/multicultural education. Prior to assuming this role, Jessica served nine years as the Executive Director of Special Education and Intervention Services for CMSD. Jessica believes that CMSD's Post-Pandemic Learning Vision can be realized for every CMSD learner through equitable instructional practices, personalized academic and whole human services, and a commitment to dismantling barriers and ineffective systems. Jessica holds a bachelor's degree in psychology from Dartmouth College, a master's degree in special education from the University of Virginia, and an Education Specialist degree in Educational Leadership at The George Washington University.

Sue Gamm, Esq., National Expert and Council of the Great City Schools Consultant: Sue is a special educator/attorney who has spent more than 40 years specializing in the systemic

improvement and effective education of students with disabilities and those with academic and behavioral challenges. Sue has blended her unique legal/special education programmatic expertise with her experiences as the chief specialized services officer for the Chicago Public Schools (CPS), attorney/division director for the Office for Civil Rights (US Department of Education), and special educator to become a highly regarded national expert as an author, consultant, presenter, and evaluator. Since her 2002 retirement from CPS, Sue has worked in 34 states/District of Columbia with 70 school districts and five state educational agencies to improve instruction and support for students with disabilities. She has written special education standard operating procedure manuals and/or MTSS for 10 school districts, and has shared her knowledge of IDEA, Section 504, and the Americans with Disabilities Act, and related issues at more than 70 national, state and local conferences. Sue has authored/co-authored numerous periodicals and publications, including Online Guide to RTI-Based LD Identification Toolkit (National Center for Learning Disabilities); Using Multi-Tiered Systems of Support (Council of the Great City Schools) and Disproportionality in Special Education: Identifying Where and Why Overidentification of Students Occurs (LRP Publications). She has testified before Congressional and Illinois legislative committees and helped to prepare U.S. Supreme Court Amicus Curiae briefs for the Council of Great City Schools and has served as an expert witness in nine special education federal court cases.

Corey Golomb, Assistant Superintendent, Specialized Academic Support Services, Fort Worth Independent School District: Corey is originally from Kingston, Ontario Canada. She earned a Bachelor of Physical & Health Education from University of Toronto, Toronto, Canada followed by a Bachelor of Education from Queen's University, Kingston, Canada. She then continued on with Master of Education Auburn University, Montgomery, Alabama, followed by a Master of Educational Administration University Of North Texas, Denton, Texas. With over 40 years in the field of education, from the classroom to central administration, her current role is the Assistant Superintendent of Specialized Academic Support Services (SASS) for the Fort Worth Independent School District. In this role, she utilizes methodical and consistent organization and management skills to ensure implementation and monitoring of the State and Federal accountability systems for students receiving services for the district's special populations such as: Gifted and Talented, Educational Technology, Library Media Services, Section 504, Multi-Tier System Support and Special Programs, Dyslexia Services, Psychological Services, and Special Education.

APPENDIX F. ABOUT THE COUNCIL AND HISTORY OF STRATEGIC SUPPORT TEAMS

The Council of the Great City Schools is a coalition of 78 of the nation’s largest urban public-school systems. The organization’s Board of Directors is composed of the superintendent, CEO, or chancellor of schools and one school board member from each member city. An executive committee of 24 individuals, equally divided in number between superintendents and school board members, provides regular oversight of the 501(c)(3) organization. The composition of the organization makes it the only independent national group representing the governing and administrative leadership of urban education and the only association whose sole purpose revolves around urban schooling.

The mission of the Council is to advocate for urban public education and to assist its members in to improve and reform. The Council provides services to its members in the areas of legislation, research, communications, curriculum and instruction, and management. The group also convenes two major conferences each year; conducts studies of urban school conditions and trends; and operates ongoing networks of senior school district managers with responsibilities for areas such as federal programs, operations, finance, personnel, communications, instruction, research, and technology. Finally, the organization informs the nation’s policymakers, the media, and the public of the successes and challenges of schools in the nation’s Great Cities. Urban school leaders from across the country use the organization as a source of information and an umbrella for their joint activities and concerns.

The Council was founded in 1956 and incorporated in 1961 and has its headquarters in Washington, DC. Since the organization’s founding, geographic, ethnic, language, and cultural diversity has typified the Council’s membership and staff. The following table lists the Council’s history of Strategic Support Teams.

City	Area	Year
Albuquerque	Facilities and Roofing	2003
	Human Resources	2003
	Information Technology	2003
	Special Education	2005 & 2018
	Legal Services	2005
	Safety and Security	2007
	Research	2013
	Human Resources	2016
	Special Education	2018
	Anchorage	Finance
Communications		2008
Math Instruction		2010

	Food Services	2011
	Organizational Structure	2012
	Facilities Operations	2015
	Special Education	2015
	Human Resources	2016
Atlanta		
	Facilities	2009
	Transportation	2010
	Classified Staffing	2019
Aurora		
	Information Technology	2019
Austin		
	Special Education	2010
Baltimore		
	Information Technology	2011
Birmingham		
	Organizational Structure	2007
	Operations	2008
	Facilities	2010
	Human Resources	2014
	Financial Operations	2015
Boston		
	Special Education	2009
	Curriculum & Instruction	2014
	Food Service	2014
	Facilities	2016
	Special Education	2022
Bridgeport		
	Transportation	2012
Broward County (FL)		
	Information Technology	2000
	Food Services	2009
	Transportation	2009
	Information Technology	2012
	Information Technology	2018
	Facilities Operations	2019
Buffalo		
	Superintendent Support	2000
	Organizational Structure	2000

	Curriculum and Instruction	2000
	Personnel	2000
	Facilities and Operations	2000
	Communications	2000
	Finance	2000
	Finance II	2003
	Bilingual Education	2009
	Special Education	2014
	Facilities Operations	2019
Caddo Parish (LA)		
	Facilities	2004
Charleston		
	Special Education	2005
	Transportation	2014
	Finance	2019
Charlotte-Mecklenburg		
	Human Resources	2007
	Organizational Structure	2012
	Transportation	2013
Cincinnati		
	Curriculum and Instruction	2004
	Curriculum and Instruction	2009
	Special Education	2013
Chicago		
	Warehouse Operations	2010
	Special Education I	2011
	Special Education II	2012
	Bilingual Education	2014
Christina (DE)		
	Curriculum and Instruction	2007
Clark County		
	Operations	2019
	Special Education	2019
Cleveland		
	Student Assignments	1999, 2000
	Transportation	2000
	Safety and Security	2000
	Facilities Financing	2000
	Facilities Operations	2000
	Transportation	2004

	Curriculum and Instruction	2005
	Safety and Security	2007
	Safety and Security	2008
	Theme Schools	2009
	Special Education	2017
Columbus	Superintendent Support	2001
	Human Resources	2001
	Facilities Financing	2002
	Finance and Treasury	2003
	Budget	2003
	Curriculum and Instruction	2005
	Information Technology	2007
	Food Services	2007
	Human Resources	2020
	Transportation	2020
Dallas	Procurement	2007
	Staffing Levels	2009
	Staffing Levels	2016
Dayton	Superintendent Support	2001
	Curriculum and Instruction	2001
	Finance	2001
	Communications	2002
	Curriculum and Instruction	2005
	Budget	2005
	Curriculum and Instruction	2008
	Organizational Structure	2017
Denver	Superintendent Support	2001
	Personnel	2001
	Curriculum and Instruction	2005
	Bilingual Education	2006
	Curriculum and Instruction	2008
	Common Core Implementation	2014
Des Moines	Budget and Finance	2003
	Staffing Levels	2012

	Human Resources	2012
	Special Education	2015
	Bilingual Education	2015
Detroit	Curriculum and Instruction	2002
	Assessment	2002
	Communications	2002
	Curriculum and Assessment	2003
	Communications	2003
	Textbook Procurement	2004
	Food Services	2007
	Curriculum and Instruction	2008
	Facilities	2008
	Finance and Budget	2008
	Information Technology	2008
	Stimulus planning	2009
	Human Resources	2009
	Special Education	2018
East Baton Rouge	Human Resources	2021
	Special Education	2022
	Bilingual Education	2022
El Paso	Information Technology	2019
Fresno	Curriculum and Instruction	2012
	Special Education	2018
Guilford County	Bilingual Education	2002
	Information Technology	2003
	Special Education	2003
	Facilities	2004
	Human Resources	2007
	Transportation	2017
Hawaii	Financial Operations	2019
Hillsborough County	Transportation	2005
	Procurement	2005

	Special Education	2012
	Transportation	2015
Houston		
	Facilities Operations	2010
	Capitol Program	2010
	Information Technology	2011
	Procurement	2011
Indianapolis		
	Transportation	2007
	Information Technology	2010
	Finance and Budget	2013
	Finance	2018
Jackson (MS)		
	Bond Referendum	2006
	Communications	2009
	Curriculum and Instruction	2017
Jacksonville		
	Organization and Management	2002
	Operations	2002
	Human Resources	2002
	Finance	2002
	Information Technology	2002
	Finance	2006
	Facilities operations	2015
	Budget and finance	2015
Kansas City		
	Human Resources	2005
	Information Technology	2005
	Finance	2005
	Operations	2005
	Purchasing	2006
	Curriculum and Instruction	2006
	Program Implementation	2007
	Stimulus Planning	2009
	Human Resources	2016
	Transportation	2016
	Finance	2016
	Facilities	2016
	Curriculum and Instruction	2016

	Information Technology	2022
Little Rock		
	Curriculum and Instruction	2010
Los Angeles		
	Budget and Finance	2002
	Organizational Structure	2005
	Finance	2005
	Information Technology	2005
	Human Resources	2005
	Business Services	2005
Louisville		
	Management Information	2005
	Staffing Levels	2009
	Organizational Structure	2018
Memphis		
	Information Technology	2007
	Special Education	2015
	Food Services	2016
	Procurement	2016
Miami-Dade County		
	Construction Management	2003
	Food Services	2009
	Transportation	2009
	Maintenance & Operations	2009
	Capital Projects	2009
	Information Technology	2013
Milwaukee		
	Research and Testing	1999
	Safety and Security	2000
	School Board Support	1999
	Curriculum and Instruction	2006
	Alternative Education	2007
	Human Resources	2009
	Human Resources	2013
	Information Technology	2013
Minneapolis		
	Curriculum and Instruction	2004
	Finance	2004
	Federal Programs	2004

	Transportation	2016
	Organizational Structure	2016
Nashville		
	Food Service	2010
	Bilingual Education	2014
	Curriculum and Instruction	2016
Newark		
Curriculum and Instruction	2007	
	Food Service	2008
New Orleans		
	Personnel	2001
	Transportation	2002
	Information Technology	2003
	Hurricane Damage Assessment	2005
	Curriculum and Instruction	2006
New York City		
	Special Education	2008
Norfolk		
	Testing and Assessment	2003
	Curriculum and Instruction	2012
	Transportation	2018
	Finance	2018
	Facilities Operations	2018
Omaha		
	Buildings and Grounds Operations	2015
	Transportation	2016
Orange County		
	Information Technology	2010
Palm Beach County		
	Transportation	2015
	Safety & Security	2018
Philadelphia		
	Curriculum and Instruction	2003
	Federal Programs	2003
	Food Service	2003
	Facilities	2003
	Transportation	2003
	Human Resources	2004

	Budget	2008
	Human Resource	2009
	Special Education	2009
	Transportation	2014
Pittsburgh	Curriculum and Instruction	2019
	Curriculum and Instruction	2005
	Technology	2006
	Finance	2006
	Special Education	2009
	Organizational Structure	2016
	Business Services and Finance	2016
	Curriculum and Instruction	2016
	Research	2016
	Human Resources	2018
	Information Technology	2018
	Facilities Operations	2018
Portland		
	Finance and Budget	2010
	Procurement	2010
	Operations	2010
Prince George's County		
	Transportation	2012
Providence		
	Business Operations	2001
	MIS and Technology	2001
	Personnel	2001
	Human Resources	2007
	Special Education	2011
	Bilingual Education	2011
	Bilingual Education	2019
Puerto Rico		
	Hurricane Damage Assessment	2017
	Bilingual Education	2019
Reno		
	Facilities Management	2013
	Food Services	2013
	Purchasing	2013
	School Police	2013

	Transportation	2013
	Information Technology	2013
Richmond	Transportation	2003
	Curriculum and Instruction	2003
	Federal Programs	2003
	Special Education	2003
	Human Resources	2014
	Financial Operations	2018
Rochester	Finance and Technology	2003
	Transportation	2004
	Food Services	2004
	Special Education	2008
	Human Resources	2022
Sacramento	Special Education	2016
San Antonio	Facilities Operations	2017
	IT Operations	2017
	Transportation	2017
	Food Services	2017
	Human Resource	2018
San Diego	Finance	2006
	Food Service	2006
	Transportation	2007
	Procurement	2007
San Francisco	Technology	2001
St. Louis	Special Education	2003
	Curriculum and Instruction	2004
	Federal Programs	2004
	Textbook Procurement	2004
	Human Resources	2005
St. Paul	Special Education	2011
	Transportation	2011

Seattle	Organizational Structure	2017
	Human Resources	2008
	Budget and Finance	2008
	Information Technology	2008
	Bilingual Education	2008
	Transportation	2008
	Capital Projects	2008
	Maintenance and Operations	2008
	Procurement	2008
	Food Services	2008
	Capital Projects	2013
	Transportation	2019
Stockton	Special Education	2019
Toledo	Curriculum and Instruction	2005
Washington, D.C.	Finance and Procurement	1998
	Personnel	1998
	Communications	1998
	Transportation	1998
	Facilities Management	1998
	Special Education	1998
	Legal and General Counsel	1998
	MIS and Technology	1998
	Curriculum and Instruction	2003
	Budget and Finance	2005
	Transportation	2005
	Curriculum and Instruction	2007
	Common Core Implementation	2011
Wichita	Transportation	2009
	Information Technology	2017