



Special Education Audit of Intake, Identification, Evaluation, and Admission, Review, and Dismissal Processes

Austin Independent School District

Special Education Audit of Intake, Identification, Evaluation, and Admission, Review, and Dismissal Processes in Austin ISD

Coherence with Expected Quality Standards, Compliance with State/Federal Guidelines, and Areas for Improvement and Best Practice

Table of Contents

1	Introduction
5	Systems Issues Related to the Austin ISD Compliance Audit
19	Multi-Tiered Systems of Support
23	Child Find
26	Referral for Special Education
30	Special Education Evaluations
35	ARD Committee Meeting Processes
40	Special Education Monitoring for Compliance
45	Accountability Systems
49	Parent Communication and Engagement



List of Appendices

Appendix A: Comparison Study of Staffing in Austin ISD

Appendix B: Parent Survey Data

Appendix C: Austin ISD Historical Data re: Special Education Referrals, Evaluations, And ARDs

Appendix D: Cross-Departmental Meeting Summary

Appendix E: Folder Review

Appendix F: Summary of Student Observations

Appendix G: Summary of Child Study Team Observations

Introduction

For many years, the Austin Independent School District (Austin ISD) has faced concerns from parents of students with disabilities, from the community it serves, and from within its own ranks. At issue are investigations spanning from July 2019 (TEA, 2023) to the present of non-compliance with legally required procedural safeguards designed to protect the rights of students with disabilities to a free and appropriate public education. These protections relate to Intake, Identification, Evaluation, Admission, Review, and Dismissal (ARD) meeting processes. In addition, the quality of the district's Multi-Tiered Systems of Support for students experiencing difficulty in school is also reviewed.

In 2022, The Texas Education Agency (TEA) provided a special investigation report that, in part, recommended the Commissioner require the completion of a third-party audit in response to the finding that Austin ISD "has repeatedly failed to meet special education requirements under state and federal statutes, rules, and regulations" (TEA Order, p. 2). Following a competitive bid process, Stetson & Associates, Inc. was selected in October 2023 to complete this Special Education Audit for Austin ISD in response to RFP 24RFP021. This final report analyzes current practices and provides recommendations for achieving legally compliant supports and services for students with disabilities in Austin ISD. This audit report intends to provide the district with clear information regarding critical systemic issues that have contributed to the findings of non-compliance, the quality standards against which present performance should be judged, and provide specific recommendations for remedying ineffective, inefficient, and illegal practices related to compliance.

As requested through the TEA Order, an update regarding the work recommended by the May 2022 Program Evaluation Report must be submitted as part of the Strategic Plan due no later than April 30 and publicly available on the state of special education in

Austin ISD and the strategic plan that accompanies it by June 30, 2024. It is required that Austin ISD include the steps necessary to rapidly correct non-compliance issues and ensure that Austin ISD's students with disabilities and their families receive services that lead to strong and positive outcomes within a fully compliant system. This report will identify the contributing factors for non-compliance, provide an updated status of the tasks already completed, and outline the remaining tasks and recommendations. As each day passes, additional progress is being made, and the final strategic plan will capture this continuing progress.

Recognition and Perspective

This report will use clear and direct language to best serve the district and community in understanding the factors contributing to the past four years of non-compliance. Working through all variables of importance in determining the causes of serious legal, structural, and programmatic failures was challenging. Still, it is essential to state the following as context for the reader.

- 1 Numerous district and department-level administrators have contributed to the compliance and quality problems over the four years.
- 2 With three Superintendents and four Assistant Superintendents at the helm in this same period, the sheer enormity of the various philosophies, approaches, directives, and perspectives provides an inkling of the challenges that resulted in what most would consider an egregious set of circumstances that left some of our most vulnerable students with either no services or late services or services that did not reflect quality practices.
- 3 The errors committed were not only errors in leadership and judgment. They represented serious lapses in providing legal guarantees to a free and appropriate public education, codified as far back as 1975.

The Stetson and Associates team has avoided using a broad brush to examine the causes of the identified multiple concerns, errors, and missteps. For example, we have determined that the problems recognized in this report did not begin with the current and newly named staff.

Mr. Matias Segura was named Superintendent in January 2024. Dr. Dru McGovern-Robinett, Assistant Superintendent for Special Education, was called to her position in June 2022. She previously worked for the Austin ISD Department of Human Resources and was a district campus principal. The Agreed Order between TEA and Austin ISD was finalized on September 29, 2023.

Throughout this Audit, we have looked carefully at leadership decisions from the beginning of the non-compliance period. We want to state our observations about those responsible for correcting the current status.

- The Board of Trustees has named the improvements in special education performance as their top priority and devote considerable time and attention to matters related to this priority.
- Mr. Matias Segura, throughout his tenure as Acting Superintendent and now Superintendent, has provided organizational, technical, and fiscal support to address the issues in providing quality, legally compliant services to students with disabilities in Austin ISD. Specifically, he:
 - a. Brought key personnel from across the district to identify the systems failures and necessary improvements;
 - b. Identified the root causes for the numerous issues, such as personal shortages, and the creation of the backlog;
 - c. Visited schools across the system to engage principals and faculty in building his understanding of the challenges that the schools are facing in addressing the problems;
 - d. Insisted on a code of complete transparency – not looking to place blame but to identify priorities and to rebuild trust at the parent and community levels;
 - e. Made available targeted resources, such as a new Director of Strategic Integration, and several experts on contract to facilitate the problem-solving process and to plan achievable goals;
 - f. “Make the organization attractive for the next leader.” (First stated as Mr. Segura served as Interim Superintendent.)
 - g. Met with leaders at the highest level of the responsible team(s) at least weekly to monitor progress and provide additional support as needed.
- Dr. Dru McGovern-Robinett, named Assistant Superintendent for Special Education, June 2022. According to the January 11, 2023, Board Report provided by Dr. Robinett, the department has accomplished the task of reducing the past due evaluations throughout Jan - Dec 2023, and during this period, past due evaluations decreased by 82.8% from 1780 to 306. Dr. Robinett also reported that during the 2023-24 SY, there was an average of 68 initial evaluations past due in the first five months of school and an average of eight per month from October to December. They continue to work resolutely to identify the system's issues, correct them, and ensure that these necessary changes are sustained over time and are not committed again.

Neither of these leaders contributed to the problems outlined in this report but they do have the responsibility to correct them and to address the systems issues that surround them.

Organization of this Report

Part One

This report will present seven systems issues that form the basis for understanding the context for our findings.

- Systems Issue 1: Significant and Growing Educator Shortages on a National Scale
- Systems Issue 2: Inadequate Data Systems
- Systems Issue 3: Lack of Clear Responsibility for Compliance Status
- Systems Issue 4: A More Seamless Organizational Structure
- Systems Issue 5: Program or Label Orientation Must Transition to Individual Student Needs
- Systems Issue 6: Need a More Robust Professional Development System
- Systems Issue 7: Respectful Parent-School Relationships Must be Universal

Part Two

The remaining audit report will provide a detailed analysis of the following specific practices.

- Multi-Tiered Systems of Support (MTSS)
- Child Find
- Referral for Special Education
- Special Education Evaluation
- Admission, Review, and Dismissal Meeting Process
- Monitoring for Special Education Compliance
- Accountability Systems
- Parent-School Relationships

For each of the practices listed above, a discussion of Standards, Findings, and a listing of Recommendations is provided.

1

Systems Issues Related to the Austin ISD Compliance Audit



Each time an audit or evaluation is conducted in any organization, public or private, there are overarching issues that must be recognized to effectively understand the causes and potential solutions to the problem posed. In this report of findings related to the status of Austin ISD's compliance with legally required procedures for students with disabilities, there are seven major systems issues that must be addressed for the specific recommendations proposed in the next eight sections to be effective and lasting. These are not excuses for the current status of the district, but rather cautions that the problems and solutions are not simple. We will begin with a description of each of these systems issues as they form the context for understanding the problem at a deeper level.

Systems Issue 1: Significant and Growing Educator Shortages on a National Scale

There are significant national educator shortages for teachers, particularly for special education teachers, and for positions that support referral and evaluation services, such as School Psychologists and Related Service personnel. This issue has had and likely will continue to have a major impact on providing required services and providing them within required timelines. Recent Texas-specific data includes the following:

As the youth mental health crisis deepens, there's a critical shortage in Texas of school psychologists. This past school year in Texas public schools, according to Texas Education Agency data, there was one school psychologist for every 2,617 students. The National Association of School Psychologists recommends schools have one school psychologist for every 500 students. (Based on our recently updated Comparison Study for Austin ISD, the district has one School Psychologist for every 603 students.) (Refer to Appendix A for the Updated Comparison Study.) According to state data analyzed by the CBS News Texas I-Team, Texas schools have added fewer than 200 school psychologist positions across the entire state in the past five years (CBS, 2023).

Eighty-six percent of U.S. K-12 public schools reported challenges hiring teachers for the 2023-24 school year. The most frequently cited teaching positions with vacancies that needed to be filled were general elementary (cited by 71 percent of public schools) and special education teachers (70 percent). *Key barriers to hiring include too few candidates and a lack of qualified applicants (NCES, 2023).*

An interview with Brandi Hosack, Austin ISD's Chief Talent Strategy Officer, was conducted on February 22, 2024, that added information regarding the experiences of Austin ISD that reinforces the challenges regarding personnel shortages described above. The first topic discussed related to the results achieved by this department within the past year, particularly implementing 'out of the box' strategies for locating a sufficient number of employed and on-contract school psychologists and other necessary evaluation personnel to make significant gains in reducing the number of students who were awaiting determination of eligibility for receiving special education services. Additional steps include the following:

- Stipend increases for special educators (\$7K);
- Increases in compensation for teaching assistants serving special education students;
- Increase in the pay for school psychologists and diagnosticians by 20% plus the inclusion of the stipend;
- Increase in the pay for related service providers by 7% plus the inclusion of the stipend;
- Substantial investment in contracted staff to assist with addressing backlogs and any additional support needs due to staff absences, increasing student needs due to growth, as well as support over breaks and during the summer, when needed; and,
- The special education department complemented these efforts by initiating weekend evaluations, return of retirees and an extremely flexible scheduling process

Ms. Hosack and her department staff have recruited over 41 international teachers who are bilingual special education teachers on VIT certification. This will address a major concern for the district: insufficient numbers of special education teachers who speak Spanish. The Talent Department's efforts to increase this critical population are enhanced through the recent adoption of a Visiting International Teacher (VIT) certification program. The Talent Strategy department has also secured Supporting Effective Educator Development (SEED) funding to design and operate Austin ISD's own teacher certification program. These funds are allocated "to increase the number of highly effective educators by supporting the implementation of Evidence-Based practices that prepare, develop, or enhance the skills of teachers, principals, and other school leaders" (U.S. Department of Education).

While the personnel gaps are not yet filled and will pose a continuing challenge for most districts across the country into the next decade, Austin ISD’s approach is aggressive and includes alternative routes to certified educators, partnerships with contract agencies to supplement staff, and competitive financial incentives. The district may need to continue to develop unique approaches to recruiting and maintaining a sufficient special education workforce to meet the needs of students in the district.



Austin ISD’s approach includes alternative routes to certified educators, partnerships with contract agencies to supplement staff, and competitive financial incentives.

The following tables present a Comparison Study included in the 2022 Program Evaluation Report and updated in 2024.

Table 1: Comparable District Staffing Ratios for Special Education Teachers in Austin ISD and Four Comparison Districts as reported in the TAPR for the 2021-22 and 2022-23 School Years

Entity	Students With Disabilities (In Membership)			Special Education Teachers			Teacher: Student With a Disability		
	20-21	21-22	22-23	20-21	21-22	22-23	20-21	21-22	22-23
Austin	9,952	9,396	10,128	755.3	867.7	459.5*	1:13	1:11	1:22
Region 13	46,901	46,561	51,802	3,157	3,572	3,142	1:14.9	1:13	1:16.4
Fort Bend ISD	8,256	8,607	9,687	516.7	476	510.7	1:17.6	1:18	1:19
Fort Worth ISD	7,953	7,923	8,438	497.5	400.6	366.7	1:16	1:19.7	1:23
Katy	10,634	11,725	13,467	572.2	668.6	709.1	1:19	1:17.5	1:19
North East	7,170	7,550	8,209	606.8	634.6	622.9	1:12	1:11.9	1:13

Data source: Texas Education Agency, Texas Annual Performance Reports (TAPR) for 2020-21 through 2022-23; *An additional data source provided by the district was 715 and this impacted the pupil teacher ratio substantially.

Table 2: Comparable District Staffing Ratios for Diagnosticians in Austin ISD and Four Comparison Districts as reported in the PEIMS Standards Reports for Staffing for the 2021-22 and 2022-23 School Years

Entity	Students With Disabilities (In Membership)			Diagnosticians			Diagnostician: Student With A Disability		
	20-21	21-22	22-23	20-21	21-22	22-23	20-21	21-22	22-23
Austin	9,952	9,396	10,128	19.50	18	16*	1:510	1:522	1:633
Region 13	46,903	46,561	51,802	175.51	188.62	185.83	1:267	1:247	1:279
Fort Bend ISD	8,256	8,607	9,687	58.82	61	65.84	1:140	1:141	1:147
Fort Worth ISD	7,953	7,923	8,438	88.87	94.75	82.76	1:89	1:84	1:102
Katy	10,634	11,725	13,467	102	104	107.88	1:104	1:113	1:125
North East	7,170	7,550	8,209	11.	10.50	10.50	1:652	1:719	1:782

Table 3: Comparable District Staffing Ratios for School Psychologists in Austin ISD and Four Comparison Districts as reported in the PEIMS Standards Reports for Staffing for 2021-22 and 2022-23 School Years

Entity	Students With Disabilities (In Membership)			School Psychologist			School Psychologist: Student With a Disability		
	20-21	21-22	22-23	20-21	21-22	22-23	20-21	21-22	22-23
Austin	9,952	9,396	10,128	16.50	12	7*	1:603	1:783	1:1447
Region 13	46,903	46,561	51,802	247.29	236.06 (+2 Psych. Assoc.)	249.55	1:190	1:196	1:208
Fort Bend ISD	8,256	8,607	9,687	46.70	53	53.93	1:177	1:162	1:180
Fort Worth ISD	7,953	7,923	8,438	44.60	38.88 (+ 5 Psych. Assoc.)	35.20	1:178	1:181	1:240
Katy	10,634	11,725	13,467	61.50	64	55.	1:173	1:183	1:245
North East	7,170	7,550	8,209	52.	46.61	42.50	1:138	1:162	1:193

Special Education Audit of Intake, Identification, Evaluation, and Admission, Review, and Dismissal (ARD) Processes

Table 4: Comparable District Staffing Ratios for Total Appraisal Staff as reported in the PEIMS Standards Reports for Staffing for the 2021-22 and 2022-23 School Years

Entity	Students With Disabilities (In Membership)			Total Appraisal Staff			Total Appraisal Staff: Student With a Disability		
	20-21	21-22	22-23	20-21	21-22	22-23	20-21	21-22	22-23
Austin	9,952	9,396	10,128	36	30	23*	1:276	1:313	*1:440
Region 13	46,903	46,561	51,802	424.8	426.68	435.38	1:110	1:109	1:119
Fort Bend ISD	8,256	8,607	9,687	105.52	114.93	119.77	1:78	1:75	1:81
Fort Worth ISD	7,953	7,923	8,438	133.47	129.95	117.96	1:60	1:61	1:72
Katy	10,634	11,725	13,467	163.50	159	162.88	1:65	1:74	1:83
Northeast	7,170	7,550	8,209	63	53	53	1:114	1:142	1:155

Table 5: Comparable District Staffing Ratios for Speech/Language Pathologists Staff

Entity	Students With Disabilities (In Membership)			Total Speech Pathologists			Speech Pathologists: Student With a Disability		
	20-21	21-22	22-23	20-21	21-22	22-23	20-21	21-22	22-23
Austin	9,952	9,396	10,128	75.70	76.60	74*	1:131	1:123	*1:137
Region 13	46,903	46,561	51,802	405.98	413.44	342.24	1:116	1:113	1:151
Fort Bend ISD	8,256	8,607	9,687	71.89	62.76	65.77	1:115	1:137	1:147
Fort Worth ISD	7,953	7,923	8,438	96.65	97.79	99.68	1:82	1:81	1:85
Katy	10,634	11,725	13,467	157.98	144.17	123.36	1:67	1:83	1:109
North East	7,170	7,550	8,209	44.11	66.66	55.16	1:163	1:113	1:186

Table 6: Four-Year Comparison of Austin ISD Special Education Teacher to Special Education Student Ratio

	Special Education Teacher to Special Education Student Ratio			
	2020-21	2021-22	2022-23	2023-24
AUSTIN ISD	1:13	1:11	1:22	1:16

Table 7: Four-Year Comparison of Austin ISD Diagnostician to Special Education Student Ratio

	Diagnostician to Special Education Student Ratio			
	2020-21	2021-22	2022-23	2023-24
AUSTIN ISD	1:510	1:522	None reported to PEIMS (16*)	1:291

Table 8: Four-Year Comparison of Austin ISD School Psychologist to Special Education Student Ratio

	School Psychologist to Special Education Student Ratio			
	2020-21	2021-22	2022-23	2023-24
AUSTIN ISD	1:603	1:783	None reported to PEIMS (1:1,745*)	1:370

Table 9: Four-Year Comparison of Austin ISD Total Appraisal Staff to Special Education Student Ratio

	Total Appraisal Staff to Special Education Student Ratio			
	2020-21	2021-22	2022-23	2023-24
AUSTIN ISD	1:276	1:313	None reported to PEIMS (1:440*)	1:163

Table 10: Four-Year Comparison of Austin ISD Speech Language Pathologist to Special Education Student Ratio

	Speech Language Pathologist to Special Education Student Ratio			
	2020-21	2021-22	2022-23	2023-24
AUSTIN ISD	1:132	1:123	None reported to PEIMS (1:137*)	1:165

*Data Source for tables 1-10: Texas Education Agency Texas Academic Proficiency Reports (TAPR) for 2020-21 through 2022-23, and PEIMS Standards Reports/FTEs and Salary for 2021-2023; *Note: There was no data reported in the PEIMS data standards for Austin ISD for 2022-23 school year. The FTEs for 2022-23 and the current school year, 2023-24, were reported by the district to Stetson Assoc. to be included in this report.*

There is no doubt that the current personnel shortage of critical positions has had a significant impact on the extent to which quality evaluations are provided in a timely matter. As reported to the Austin ISD Board of Trustees, the number of “out of timeline evaluations” changed from 1,780 to 306 as of January 2024.

To improve student outcomes for those receiving special education services, evaluation services must be of the highest quality and not only provide guidance regarding the qualifying disability category but meaningful information that supports teacher efforts to design instruction and interventions that increase student success. With timely referrals and evaluations, the pipeline of students requiring special education services from certified and fully qualified teachers has increased over the past few months. This places even greater importance on successful onboarding processes and results-based professional development to develop the highest quality evaluations from individuals interested in remaining within the school system.

Note of Caution: Austin ISD, in interviews with department leadership, recognizes that they must quickly transition from some stop-gap measures, such as virtual evaluations, to recognized practices of quality for evaluation services. These are discussed more thoroughly in the Evaluation Section of this report.

The Strategic Plan, required by the Texas Education Agency, must include steps to be taken to phase out any processes used for rapidly closing the testing gap and replacing those processes with strategies that reflect best practices. The strategies that were necessary to remedy the missed timelines, while vital at the time, will require phase-out as appropriate.

Systems Issue 2: Inadequate Data Systems

Austin ISD adopted a data system that does not provide reliable information necessary for monitoring the compliance status of individual students or the group in its entirety without acquiring substantial supplemental data available from different sources and additional verification efforts. In the Spring of 2022, when there were substantial leadership changes in the district, a data system was procured that did not include the level of advanced vetting and customization needed. Such a system, or lack thereof, is at the crux of the district's current difficulty to monitor compliance without additional sources and considerable effort.

Currently, Austin ISD utilizes a data management system for special education (EasyIEP) that has not provided data for reliable tracking and monitoring of real-time information regarding timeline compliance for referrals, evaluations, and ARD Committee Meetings. This has not supported campus administrators in participating in the monitoring of special education compliance. To address this issue the district created two supplemental data systems that, combined with EasyIEP, do allow the district to presently monitor compliance.

The EasyIEP system continues to be an issue in the district and does not allow for data management and reporting that meets state requirements or the data needs of the district. Numerous meetings and a defined task list have been prepared by the district regarding these items, as well as adding technology consultants and Strategic Integration and Project Management Staff.

A solution to this massive concern must be found quickly, and it is necessary to focus on clear and concise problem-solving and collaboration to correct this problem. This systems issue is very easy to identify, but the solutions remain frustratingly challenging and incomplete at the time of the writing of this report. The role of the technology experts in Austin ISD must be to turn these legal requirements into a practical reality. In this case, special education guidance must be clear and take precedence over technological preferences when technological preferences do not meet the letter of the law or increase ease and consistency of use.

There are three very positive commitments expressed by members of the department tasked with the revisions of the EasyIEP product. First, they are committed to remedying the errors cited in the TEA Order and second, to looking beyond the Order

to make more extensive changes in the system that will address certain elements that are also non-compliant but were not cited. An example of this is the drop-down menu for testing accommodations that presently displays options that are not allowed in the Texas English Language Proficiency Assessment System (TELPAS). This is an English language proficiency assessment required for students in grades K-12 that have been identified as an emergent bilingual (EB) student. Third, the team believes that they can and will make all of the required adjustments that will greatly enhance alignment with compliance items, make report generation easier for all users and provide a clear picture of the status of evaluation tasks. This issue is discussed in depth throughout this report.

Systems Issue 3: Lack of Clear Responsibility for Compliance Status

Current practices in Austin ISD reflect a general lack of shared responsibility, in some but not all schools, to meet the requirements for serving students with disabilities appropriately and effectively. Compliance is most certainly a district-level responsibility, but it is also a responsibility for campus leaders as well. There were several Austin ISD schools that parents noted as particularly effective in both meeting compliance responsibilities and creating a positive learning climate for their children. Follow-up telephone interviews were conducted with these principals to ascertain their leadership approach to creating a culture of shared responsibility across all faculty members for meeting compliance standards, performing related duties, and achieving positive outcomes for students with disabilities (comments located in Appendix B). If it can occur in some schools – it can occur in all schools.

Compliance must become a collaborative responsibility with specific checkpoints built into the system so that each area clearly understands the tasks before them. All staffing categories share responsibilities for compliance, including general educators, special educators, campus administrators, and central office department leaders. Full compliance can best be achieved by the explicit assignment of roles and responsibilities. These compliance responsibilities must be spelled out. This is under development by the Austin ISD special education department.

Systems Issue 4: A More Seamless Organizational Structure

The existing district and departmental structures do not facilitate a direct line for the special education department to work seamlessly with schools on such critical matters as full compliance and improved quality practices. A common refrain heard throughout the 2022 program evaluation process was concern for the “disconnect” between the Department of Special Education and the 120+ campuses across the district. This issue is particularly true in large school districts. While numerous steps are underway to

correct the concern regarding disconnect and inconsistency, it surfaced again in the Compliance Audit. For example, there are varying levels of implementation of quality and compliance standards, inconsistency in understanding policies and procedures, and lack of a clear understanding of campus-level roles in ensuring compliance. There is a need to review the various options, benefits, and drawbacks of revising the current organizational structure for the department.

One option to consider is the assignment of a Special Education Director for each of the administrative zones. Such a shift should result in improved communications, increased authority, accountability, and consistency of practices across schools, and improved strategic and compliance goal attainment. This organizational structure would facilitate the ability of the Assistant Superintendent for Special Education to impact necessary changes more quickly and effectively for students with disabilities while dispelling the idea that there is a “disconnect” between the district/department and the schools. There are many other approaches to consider. The methods may vary but the result should be a restructuring that requires a different kind of collaboration and shared responsibility.

Systems Issue 5: Program or Label Orientation Must Transition to Decisions Based on Individual Student Needs

The district is still emerging from a predominately traditional approach to serving students with disabilities that is characterized by embracing fairly low expectations and relying on a ‘program’ orientation in which students are typically assigned to a “place” or “program” dictated by their disability label. For some parents, ARD meeting and decision-making is, at times, not centered on the needs of the individual student. Concerns about the quality of the IEPs produced across the district were expressed, particularly by department staff and parents. The district is making great strides toward such an approach through professional development, on-site coaching, and technical assistance, but it is not complete.

This important shift is new and is at a ‘tender’ stage that could easily revert to old practices and results. While there is a significant reallocation of principal focus and faculty-wide training time and energy currently devoted to remedying the present non-compliance status, the district’s strategic plan must also incorporate the adoption of a more student-centered, results-based, inclusive model for students with disabilities. The foundational premise of the Individuals with Disabilities Act is the importance of individualizing decisions based on each student’s needs. Compliance and Excellence are two sides of the same coin. The choice is not *either-or*, but both!

Systems Issue 6: Need a More Robust Professional Development System

There is a need to build a robust system of professional development and coaching related to the critical aspects of quality instruction and services and compliance. Such a system should build the capacity across all stakeholders to understand their responsibilities, the rationale for these shared responsibilities, and the path forward for accomplishing them. The present professional development system for educators regarding research-based practices for diverse learners, including for students with disabilities is not robust or complete, and does not incorporate such necessary aspects of professional development that result in changed mindsets and practices among leaders and in the classroom. These include engaging and highly participatory training, follow-up coaching and direct application in the classroom followed by monitoring and accountability of implementation and continued professional growth. One highly relevant area of poorly received professional development relates to the preparation of staff for the effective use of the current data management and reporting system.

When asked about this concern, Chief Hosack described early plans for an adjustment of the district's process for enhancing the quality and engagement of future professional development. The current professional development staff are titled Learning Design Coordinators who are skilled in the latest techniques for training adult learners, including the best ways to structure adult learning, engage the audience in application of concepts, and facilitate the implementation of strategies learned in the training room to the classroom. Yet, when new professional development is created, the content/subject matter experts reside in the various Academic departments. This presents a difficult struggle for the planners. Thus, Chief Hosack proposes to combine the talents of the Learning Design Coordinators with the various Content Specialists (in-house experts) to work as a team to produce a much higher adult learning experience whether in person or through blended learning. Stetson and Associates highly recommends this approach!

At a time when schools must develop and support highly effective educators with 21st century skills, professional development systems in many school districts seem unable to develop meaningful, innovative options that model "good teaching" and anticipate the attitudinal and pedagogical expertise required. If this system is broken, all other systems struggle.

Systems Issue 7: Respectful Parent-School Relationships Must be Universal

Respectful and productive parent-school partnerships are at the core of compliance with laws governing special education processes. For example, parents must

understand the process from referral to evaluation to decisions reached in the ARD meeting and be comfortable assuming their roles throughout. Translations of all materials must be available in the parent's preferred language, and interpreters must be available as needed, or the guarantee of "informed consent" is null and void.

Respectful and authentic relationships with parents, families, and students are not promoted in all Austin ISD schools and thus, this necessary partnership for making decisions in the best interests of the child does not occur in all settings.

A survey was disseminated to all parents of students receiving special education services in Austin ISD, in January 2024. Of the 12,600 parents of students with disabilities in the district, there were 594 respondents, resulting in statistically significant results at a 95% confidence level. The following is a sampling of the results from this survey that addressed parent-school relationships. The full survey, disaggregated by level and by school are provided in Appendix C.

Table 6. Parent School Relationships

		Count	Column N %
1. Austin ISD's special education evaluation process was efficient and effective for my child.	Strongly Agree	175	30.2%
	Agree	239	41.2%
	Disagree	85	14.7%
	Strongly Disagree	81	14.0%
2. I am satisfied with the outcome of the special education evaluation process for my child.	Strongly Agree	211	36.4%
	Agree	274	47.3%
	Disagree	49	8.5%
	Strongly Disagree	45	7.8%
3. Overall, I am satisfied with my child's progress toward his/her IEP goals.	Strongly Agree	200	34.8%
	Agree	251	43.7%
	Disagree	75	13.1%
	Strongly Disagree	48	8.4%
4. Prior to referral for special education evaluation, I had an opportunity to discuss the process with an AISD staff member.	Strongly Agree	206	37.0%
	Agree	256	46.0%
	Disagree	57	10.2%
	Strongly Disagree	38	6.8%
5. My family observed my child having difficulty at school and requested help from the school staff. The school staff responded to our concerns in a timely and	Strongly Agree	192	37.3%
	Agree	196	38.1%
	Disagree	73	14.2%
	Strongly Disagree	54	10.5%

respectful manner.			
6. The special education evaluator worked effectively to seek information from our family related to my child’s educational and family history.	Strongly Agree	217	37.8%
	Agree	266	46.3%
	Disagree	59	10.3%
	Strongly Disagree	32	5.6%
7. Prior to and during the evaluation process, the school staff listened to my concerns regarding my child’s educational progress.	Strongly Agree	250	43.3%
	Agree	246	42.6%
	Disagree	58	10.1%
	Strongly Disagree	23	4.0%
8. I have been encouraged to be an active participant in my child’s special education evaluation.	Strongly Agree	256	44.5%
	Agree	236	41.0%
	Disagree	56	9.7%
	Strongly Disagree	27	4.7%
9. Following the completion of my child’s special evaluation, an evaluator met with my family to discuss the findings of the evaluation prior to the Admission, Review, and Dismissal (ARD) meeting.	Strongly Agree	249	43.8%
	Agree	251	44.1%
	Disagree	45	7.9%
	Strongly Disagree	24	4.2%
10. At the Admission, Review, and Dismissal (ARD) meeting in which my child’s special education evaluation was discussed, I was encouraged to be an active participant in the discussion.	Strongly Agree	285	49.3%
	Agree	245	42.4%
	Disagree	36	6.2%
	Strongly Disagree	12	2.1%
11. At the ARD meeting in which my child’s special education evaluation was discussed, the school staff demonstrated a deep understanding of and interest in addressing my child’s needs.	Strongly Agree	280	48.3%
	Agree	219	37.8%
	Disagree	49	8.4%
	Strongly Disagree	32	5.5%
12. At the ARD meeting, we considered a variety of accommodations, modifications and options for services for my	Strongly Agree	243	42.5%
	Agree	249	43.5%
	Disagree	54	9.4%
	Strongly Disagree	26	4.5%

Special Education Audit of Intake, Identification, Evaluation, and Admission, Review, and Dismissal (ARD) Processes

child.			
13. During the ARD meeting, the campus administrator and staff made my family feel more connected to my child's school.	Strongly Agree	251	43.7%
	Agree	204	35.5%
	Disagree	81	14.1%
	Strongly Disagree	38	6.6%
14. School staff have worked hard to help my child progress toward their learning goals/objectives in the IEP.	Strongly Agree	271	47.4%
	Agree	212	37.1%
	Disagree	47	8.2%
	Strongly Disagree	42	7.3%
15. Overall, I believe my child is receiving the special education services that he/she/they need.	Strongly Agree	239	42.2%
	Agree	198	35.0%
	Disagree	68	12.0%
	Strongly Disagree	61	10.8%

There are two conclusions from these data. First, the majority of Austin ISD parents of students with disabilities are satisfied with practices that are questioned in the survey. Many Austin ISD educators are to be commended regarding their pursuit of positive relationships with the parents of the students they serve.

The second conclusion, however, is that the percentage of parents who either disagreed or strongly disagreed with several of the practices in the survey is relatively high. Of the fifteen questions, only one reached the 90% agree threshold set by Stetson and Associates as our standard for effective practice. It is not a desired result, for example, for 28.6% of parents to disagree that the Austin ISD special education evaluation process was efficient and effective for my child (Question 1).

Although the parent survey responses indicated that most parents are satisfied, there were a number of survey comments, parent focus group comments, and comments from parent advocacy groups and community service groups providing services to families of children with disabilities which offered a concerning picture of the extent to which parent/school relationships are supported in all Austin ISD schools. As more than one parent commented in almost every one of the advocacy and community groups, "It feels like it is Us versus Them." This is a concern that reflects the loss of trust some parents experienced as their child's referral and/or evaluation was delayed beyond legal timelines.

Austin ISD is currently developing specialized training to expand parent/school partnerships that every school in the district must participate in before the end of the school year. A school-specific plan for improving parent engagement will be the

outcome of this training and is designed to provide a blueprint for improved efforts and results. As Austin ISD implements several planned practices for improving this parental engagement and satisfaction in the future, we recommend moving to a 95% agree standard. This issue is further addressed in Section 2.8 of this report.

2

A Detailed Analysis Of Specific Compliance Requirements And Practices

This report began in Section One with seven systems issues that form the basis for understanding the context of our findings. The remaining audit report will provide a detailed analysis of the following specific practices (Sections 2.1 through 2.8):

- Multi-Tiered Systems of Support (MTSS)
- Child Find
- Referral for Special Education
- Special Education Evaluation
- Admission, Review, and Dismissal Meeting Process
- Monitoring for Special Education Compliance
- Accountability Systems
- Parent – School Relationships

For each of the practices listed above, a discussion of Standards, Findings, and a listing of recommendations is provided.

2.1

Multi-Tiered Systems of Support



A Multi-Tiered System of Support (MTSS) is a framework that focuses on evidence-based interventions in academics, behavior, and social/emotional support for the whole child. At least three tiers are based on student needs and increase the level or intensity of support provided as a student moves from classroom-wide to targeted and intensive interventions. TEA does not mandate implementation of the MTSS process; however, a consistent MTSS process across all Austin ISD campuses is a required component of the TEA Agreed Order.

Quality Practices

The district MTSS process should be mandatory for all campuses and monitored by leadership for consistent implementation across all schools. The process requires a uniform system for documentation utilized by all campuses. This documentation should be some form of electronic data system with different levels of accessibility for documentation, allow for shared information across campuses, and import data from various platforms to include student data related to academic performance, attendance, discipline, Section 504, special education, or other program information as well as home language and any other essential student data.

The MTSS process must include specific staff, consistent procedures, and educational teams that meet regularly to review progress and the need for additional support. Principals and other key campus staff responsible for implementing the MTSS process should be able to provide input into the district's process and procedures and any electronic platform utilized. Consistently train all stakeholders annually in the MTSS process (State and Federal Regulations and TEA Agreed Order, Appendix A Requirements: TEA Agreed Order Priority II, C, and D, TEC. 26.0081).

The MTSS process is essential to supporting students before a referral to special education. It should not only be consistently implemented with fidelity across all Austin ISD campuses, but there should also be a staff development plan that ensures all

stakeholders are knowledgeable about the process, the documentation required, and the training to implement the appropriate interventions.

Findings Related to MTSS

Austin ISD has much work to do in this area but has a plan for achieving quality standards, in part due to a requirement contained in the TEA Order.

Austin ISD implements the MTSS process through its child study teams. Focus group comments indicate that district leadership does not mandate the MTSS process. The district must consistently implement this process across Austin ISD campuses. Some Austin ISD schools are implementing a successful system. In contrast, some schools still need to implement an MTSS system and express a need for more information regarding the expectations of using the process. Observations of Campus Child Study Teams and focus group comments indicate that there needs to be significantly more consistency across the district regarding awareness of an MTSS system, the rationale for its use, documentation, and tracking of interventions for students, and the specific steps required to implement the process with fidelity. Additional focus group comments indicated the need for additional tiered resources and practical intervention options, specifically for students who are not native English speakers.

The district has developed an electronic data platform, the eCST. This system was designed approximately ten years ago by the Austin ISD to assist campuses with a process for implementation and documentation of interventions for students through the Child Study Team process. The eCST platform pulls information from different district data platforms, provides documentation standards, and provides many options for training; however, there is no district requirement for campuses to use the eCST platform for documentation or to attend training to learn how to operate the program. Multiple focus group comments indicated that many participants were unfamiliar with the eCST platform and needed to use the platform to document the activities of Child Study Teams. Stetson and Associates consultants observed eight campus CST team meetings and found three campuses utilizing the eCST platform; however, the other five did not use eCST. Although there were multiple focus group comments regarding a lack of training for the MTSS process and interventions, data from the Austin ISD department responsible for MTSS indicates many opportunities for district training in various components of the MTSS process. Documentation of attendance at these meetings suggests that very few staff members participate in these training sessions.

Recommendations for Improving the MTSS Process

Leadership & Organizational Structures

1. The TEA order required that the district develop an MTSS manual to guide the district process and provide needed training on the methods described in the manual. The newly developed, but not disseminated, MTSS manual should be entirely in place by the 2024-25 school year. The availability of this new manual should advance and unify this critical process significantly.
2. Full participation must be mandated across every campus with the necessary development of all relevant staff to support their knowledgeable and effective use of a system that focuses on identifying and meeting the needs of struggling students.
3. Design close collaboration between MTSS staff, special education leadership, and evaluators regarding emerging issues in the MTSS/CST process and its alignment with the referral process for a special education evaluation. This collaboration should occur regularly.

Capacity Building

4. Provide mandatory training for all stakeholders on an annual and as-needed basis. This will provide ongoing and supplemental/expanded training that will build on the hours of TEA-mandated training on MTSS that was accomplished this school year.
5. Principals and Assistant Principals should be provided annual training before the start of the school year. The human resource department sends information to the MTSS department when a new campus administrator is appointed after the beginning of the school year. The MTSS department will contact the campus to schedule face-to-face training as quickly as feasible.
6. The MTSS department will develop a 30–45-minute scripted training for elementary and secondary teachers and principals to provide to their staff before the first student school day. This training will include a strong rationale for the process, the importance of early identification and intervention, and the critical role of teachers in the process. This script should clarify that the focus is not solely on identifying a struggling child who would benefit from additional targeted assistance from the

classroom teacher, nor is it strictly for moving to referral for students to the special education department. The script will also note the critical connection between identifying children through the MTSS system and what may be a referral for a special education evaluation. Additional information should include clear examples, requirements for documentation, and data collection of interventions. In response to the TEA Agreed Order, the current District Professional Development plan has addressed the need for district training in MTSS.

7. The MTSS department, in collaboration with special education and the district Parent Support Specialist, will provide at least one in-person training each year with a virtual option to parents regarding the overall MTSS/Child Study team process and how they can support their child in addressing interventions.
8. Provide an annual overview for other district central office staff, including special education evaluators and other related service and support staff, curriculum staff, executive directors, and other central office leadership.

Data Systems

9. Require all MTSS/CST documentation to be completed in one district-wide platform, such as eCST or something similar, allowing for easy access to all stakeholders to review.
10. Assign a central office staff member to monitor and ensure compliance consistently. This will also include specific actions for the monitor to take when campuses that need assistance with implementation are identified.

Processes and Procedures

11. Provide monthly reports to principal supervisors on using eCST documentation and implementation of the process and ask that they follow up to support the process where needed.
12. Establish a district-wide CST committee, which includes campus leaders, teachers, evaluators, and other district administrators, to review existing district data to identify gaps in services and duplication in services and make recommendations for improvement based on quality standards for MTSS.

2.2

Child Find



Child Find began following the adoption of the federal special education law in 1975. At that time, 1.8 million children in the United States were not receiving a publicly funded education due to the lack of services in their school district (USDOE, 2024). Child Find became an ongoing community-wide campaign to make the public aware of the need for early identification of children suspected of having a disability.

Quality Practices

A successful Child Find system requires a designated staff member(s) in the district who is specifically trained to receive Child Find referrals and monitor the data from Child Find activities to determine the most efficient and effective way to reach the public. The data collected is summarized in an annual evaluation, which is utilized to determine the continuing need for targeted and focused community outreach. Based on the results, scaling back or increasing Child Find activities in some geographic regions may be appropriate. Districts are required to implement Child Find as an ongoing practice.

Child Find activities must also include efforts to educate the faculty, including:

- An annual presentation on the importance of Child Find, including efforts within the school to identify students struggling academically or behaviorally.
- Training must emphasize for the faculty the vital connection between the concept of Child Find and the MTSS system for early intervention and what constitutes an appropriate referral based on suspicion of a disability instead of a lack of proper instruction (CFR §300.111 Child find, CFR §300.124, TEC 26.0081 (d)(1), TEC 29.00).

Findings in Austin ISD Related to Child Find

Child Find activities in a district are critical to addressing the needs of students with disabilities. Although Austin ISD has identified the current activities outlined in the list

above, there is no process for follow-up to determine the effectiveness of any of these activities, which is critical to a successful Child Find process. As a response to the TEA Agreed Order, Austin ISD has updated the Child Find information on its website. Ms. Amanda Molina-Garza, the Head of the Evaluation Component, is Austin ISD's newly designated Child Find administrator responsible for implementing and evaluating the system's effectiveness and is listed as the primary Child Find contact on the AISD website.

In response to a request for data from Stetson Associates, Austin ISD staff provided the following as evidence of current Child Find practices:

- Links on the external website to information for parents;
- Partnerships with Parent Support Specialists Teams to Support Child Find Awareness;
- Collaboration with Early Childhood Intervention (ECI) Agencies (Any Baby Can and Easter Seals);
- Coordination and partnership with childcare and preschools via targeted emails and outreach;
- Videos posted to external websites;
- Family Empower Hour Training (ongoing-Child Find)- one in the fall and one in the spring and posted to the external Austin ISD website;
- Private and Home School Child Find and Consultation training (one fall and one spring); and,
- Flyers posted on campuses and brochures.

Child Find Recommendations

Leadership & Organizational Structures

1. Use effective practices as a framework and formalize the Austin ISD Child Find process, including a Child Find tracking system.
2. Analyze the data related to Child Find to determine the effectiveness of the practices in place and where the district may need to make changes.
3. Produce brief reports for all members of the department leadership team and engage in regularly scheduled discussions to determine the effectiveness and health of the current Child Find system and its impact on the overall status of compliance.

Capacity Building

4. Assign and train designated staff member(s) to receive and respond to referrals received from the community.

- 5. Training for this item is referenced in #3 Capacity Building in the MTSS/CST section.

Data Systems

- 6. The district eCST platform or the platform the district uses to monitor referrals as part of MTSS/CST will also include a Child Find Data Collection component from activities established as part of the public awareness campaign.

2.3

Referral for Special Education



Referral for evaluation and consideration for services as a student with a disability may be initiated by a parent, a member of the instructional staff, or a community member. There should be a simple referral process defined by the district and executed on each campus for collecting campus data in response to a Child Study Team or parent request for evaluation; however, state and federal regulations emphasize that the lack of prior use of pre-referral interventions cannot result in a denial or delay of a special education evaluation.

Quality Practices

A district must obtain consent or deny a parent's written request for a special education evaluation within fifteen days. Parent requests for special education evaluation should be honored by campuses unless there is extensive documentation that the student is academically and behaviorally successful (§300.301, §300.503, TAC 89.1011, TAC 89.1050).

Findings for Special Education Referral

The referral process for special education should be a seamless, simple, and collaborative process that includes documentation of efforts by the campus and the student's family attempting to address the student's needs. Support for non-English parents has been inconsistent during the referral process. Principals, teachers, and parents from Austin ISD express frustration with the referral process and their perceptions regarding the 'burdensome' paperwork required. Having an effective single data management system for special education can be a strong support for the process. The Special Education Department is responsible for providing clear guidance through documents and training so that school staff and families understand how the process works. During the referral process, the campus administrator and the evaluator

assigned to the campus should support both the instructional staff and the parents. Some of these areas in Austin ISD will benefit from a focus on quality processes.

Austin ISD has recently revised its referral process. Multiple guidance documents and data systems are utilized to process a referral for a special education evaluation. These guidance documents are comprehensive and intended to provide detailed information regarding the district referral process; however, there are discrepancies among the guidance documents, and each document contains multiple hyperlinks to additional forms or information. The current guidance documents related to Child Find/Referral that have been provided to the Stetson & Associates team include the 2023-24 Initial SPED Evaluation Referral Process, Walkthrough Smartsheet Referral Process for School-Aged Children, and Early Childhood Evaluation Team (ECET) Initial Evaluation Procedures. The district also outlines the referral process in the *Administrative Guidebook to Special Education Evaluations* and the *AISD Special Education Department Evaluation Handbook*.

Austin ISD uses The Smartsheet data system to upload and document referral requests. Evaluators are then assigned through this request process and documented in Smartsheets. This data system was developed to assist principals and the special education department in tracking the evaluation process and compliance with referral, evaluation, and ARD completion and timelines. Focus group input indicates that Smartsheet has positively supported the tracking of referral information.

The following concerns regarding the Child Find Process in Austin ISD have been reported:

- Parent focus group participants report that campus administrators did not respond to requests for a special education evaluation, delaying the time frame in which the referral process started.
- Evaluators indicate insufficient information in the referral documentation to identify the specific academic or behavioral issues that have contributed to a referral for special education for the child.
- The MTSS supervisor reports that training on eCST has been delivered to all evaluators during one of their regular meetings in the past few years. Evaluators do not indicate that the data in eCST is being utilized to process a referral. The lack of consistent data available through eCST may contribute to evaluators' limited platform usage.
- Speech Therapy Leadership has recently reviewed and simplified the requirements for a speech therapy referral. This is viewed as a step in a positive direction.
- Community advocacy focus groups consistently reported concerns regarding non-English speaking parents having appropriate referral, evaluation, ARD documentation, and information regarding processes and procedures in their native language.

The district's data management systems do not communicate with each other. The district-created Data Dashboard enables administrators to run reports that provide real-time information regarding compliance timelines. Despite numerous meetings and a defined Task List prepared by Austin ISD regarding data elements and report formats requested, their IEP data management program requires considerable adjustments. The district has developed supplemental systems to allow for monitoring of timelines and allocation of staff.

As introduced as Systems Issue 2, the continued problems pose an even more significant concern – the inability to ensure a responsive and reliable process for extracting critical reports regarding timelines and pending evaluations, staffing and other compliance reports that are required by the TEA Order. The data management system continues to be a problem and must be resolved.

To date, there have been over 100 meetings between district staff and PCG representatives with the intent to correct the problems described above. These meetings continue and are intended to result in an effective system in which not only the identified problems are solved but that new and improved characteristics will also be in place.

Recommendations For Referral to Special Education

Leadership & Organizational Structures

1. Convene a stakeholder group (evaluators, SLPs, evaluation supervisors, and campus principals) to determine documentation that campuses must include in a referral request. Streamline data requirements.

Capacity Building

2. Training in the special education referral and evaluation process should be provided yearly for campus and central office leaders. Training should be delivered face-to-face to facilitate answering questions about the process.
3. Any administrators added during the school year will receive training within thirty days of beginning their position.
4. The district referral process will be reviewed annually with all special education central office staff, including evaluation staff, before the beginning of the school year.

Data Systems

5. Use the eCST system or some other electronic system to collect data for referral and inform the monitoring process that is reliable, accessible, user-friendly, and consistently used across

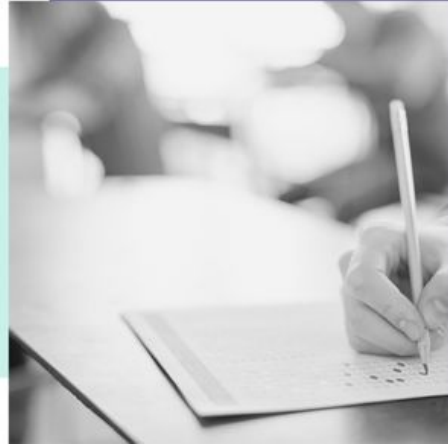
the district. Documentation will include the date the administrator received a written request for evaluation.

Processes and Procedures

6. Create a one-sheet referral checklist, which is very simple and followed by all campuses. Campus data collection for a referral should include no more than student performance, attendance, discipline, progress monitoring, and intervention data collected from administrators and teachers.
7. Define a timeline for responding to parent requests for assessment by sending A Notice of Refusal or forwarding the request to the special education department.
8. Principal supervisors should receive monthly reports from the district's data systems regarding referral timelines and will follow up to support timely compliance.
9. Consolidate all referral guidance, including speech referral, ECI, and Private/Homeschool, into a single manual that aligns district operating procedures with specific activities that are tabbed and available to all stakeholders.

2.4

Special Education Evaluations



Special education evaluations should be completed by multidisciplinary teams, with some consistency of staff from initial permission to ARD meetings so that parents and teachers have a point of contact for information and understanding of the evaluation. This includes initial assessment as well as three-year reevaluations. The role of an evaluator should be collaborative and supportive of campus problem-solving around student issues (NASP, 2021).

Quality Practices

The district should employ sufficient evaluation staff to meet the demands of the evaluation staff's workload, follow best practice guidelines, and allow adequate planning time, consultation, and communication with parents and campus staff. Digital tools should allow central office and campus administrators to regularly monitor the compliance of an evaluation with required timelines and access to any relevant information related to the implementation of a student's IEP (CFR §300.300 -§300.311, TAC §89.1011, TEC §29.0031, TEC §29.004).

Findings Related to Special Education Referral

Austin ISD has responded to a shortage of evaluators by increasing the number of evaluation staff (full-time and contract staff) and by narrowing the role of the evaluator. This entailed removing some tasks that impeded direct testing time. In the short term, this has produced consequences for both instructional staff and parents who need the expertise of a trained evaluator to support the development of a quality program of goals, services, and supports built upon a thorough evaluation report. National organizations, such as NASP, recommend a broader role for an evaluator beyond administration and interpretation of tests (<https://www.nasponline.org/about-school-psychology/who-are-school-psychologists>). Finding a long-term solution to having a

sufficient cadre of evaluators will require careful planning to return this critical role to one more closely tied to campus and family support.

Between 2020-21 and 2021-22, the number of special education evaluations completed in Austin ISD was relatively stable; however, in 2022-23, the number of special education evaluations increased significantly. It is noted that this increase occurred after students returned to school following COVID-19 and was impacted by legislative changes, which required all requests for evaluations for dyslexia to be processed as a referral for a full and individual evaluation (FIE) for special education. The rate of students who did not qualify (DNQ) for special education in the first two years of data remained stable. The DNQ rate for the 2022-23 school year decreased even as the number of evaluations grew. This pattern was similar when the numbers were broken out by school district region. The number of referrals by area of the district and the DNQ rate are shared in Appendix D.

In the Spring of 2023, Austin ISD employed 24 full-time evaluators. The limited number of evaluators significantly contributes to the district's failure to meet timeline requirements for conducting special education evaluations. Austin ISD has worked to increase the number of evaluation staff. This has been done through recruitment and the implementation of bonuses. All 74 available LSSPs and Diagnostician FTEs are currently filled by qualified staff. There are an additional 57 week-day evaluators, with 52 of them being virtual and 42 being weekend staff members working as contract employees.

Austin ISD special education leaders do not believe this number of evaluators is sufficient to meet the needs of over 12,000 students with disabilities. The historical and current staff-to-student ratios for evaluation staff are higher than any comparable district in the Stetson 2021 Program Evaluation Report or the current update included in this audit (Appendix A).

The current evaluation system emphasizes efficiency over quality in response to the number of evaluations with missed timelines. To meet state and federal guidelines and the timeline of the TEA Agreed Order, the district has narrowed the job responsibilities of evaluators to focus only on the completion of assigned evaluations. The district has also employed numerous contract evaluators (virtual and in-person) to address the backlog of evaluations and maintain compliance. Extensive efforts are currently directed to remedy this concern.

Principals and parent focus group participants expressed concern that multiple evaluators, including virtual, campus evaluators, other assigned evaluators, and contract evaluators, might participate in any evaluation from consent to the ARD committee meeting. This negatively impacts the continuity of the review and results in a lack of communication and trust with families and campus staff.

Evaluators need more interactions with parents and staff and an effective collaborative process. Parent comments from focus groups and the parent survey indicate that the current process does not support parent questions about and understanding of the evaluation results.

Multiple guidance documents regarding the evaluation process have been created. These contain multiple links, which can be confusing for evaluation and campus staff. Guidance provided across resources is only sometimes aligned; for example, information regarding who conducts evaluations for private school students is confusing. Evidence is reflected in The Administrative Guidebook to Special Education Evaluations, Austin ISD Special Education Department Evaluation Handbook, Smartsheet Referral Process for School-Aged Children, and the Speech Providers Handbook.

Multidisciplinary evaluations in Austin ISD are characterized by minimal collaboration between evaluation staff, related service providers, campus staff, and parents. Different evaluators complete different tasks in the evaluation process. One evaluator is rarely involved from referral to the completion of the ARD committee meeting to determine eligibility. This is reflected in interviews and focus group comments by related service staff.

Recommendations for Special Education Evaluation

Leadership & Organizational Structures

1. Review and revise the job descriptions of evaluators to align with the NASP recommendations of collaborative and supportive relationships with school staff and parents.
2. Use the limited staffing study included with this report and recommendations from professional organizations to determine the number of evaluators the district needs. The budget allows for an increase in the number of full-time district evaluators to reduce the reliance on contract and virtual evaluators (NASP, et al.)
3. Create a plan to move the assignment of evaluators, including related services staff, to specific campuses based on projected caseload responsibilities. Campus evaluators are responsible for the evaluation process from referral to completion of the evaluation unless timelines cannot be met.
4. The district may consider hiring clerical support to complete appropriate tasks, reclaiming additional time for the evaluator.

Replace the time high-cost personnel are required to devote to completing low-skilled tasks.

Capacity Building

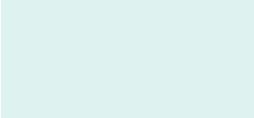
5. Train all central office staff on the *Austin ISD Special Education Department Evaluation Handbook* and specifically identify practices and procedures related to evaluation assignments, timelines, documentation, and their roles and responsibilities in supporting their assigned campuses.
6. Central office special education leadership will continue to provide annual training to all campus administrators regarding special education support staff roles, a process for problem-solving campus issues, and any updates to legal requirements.
7. Evaluation staff assigned to campuses will provide a 15–20-minute presentation to all campus staff regarding the essentials of special education eligibility, services, and timelines, with possible follow-up presentations on special education topics pertinent to their campus.
8. In collaboration with the Parent Support Center, the special education department will provide at least two in-person training sessions for parents regarding the special education process, from referral to ARD. Other training options may include virtual modules.

Data Systems

9. Central office staff will continue to use an online tracking system to monitor caseloads of ongoing and completed evaluations, including monitoring timelines and consistent implementation of the district evaluation process.
10. Principals and executive directors will continue to access this same online tracking system for students on their campuses.

Processes and Procedures

11. Define a process for requesting additional assistance in completing evaluations within the timeline for any stakeholders involved.
12. Consolidate all evaluation guidance (including speech) into a single manual that aligns operating procedures with specific activities that are tabbed and available to all stakeholders.

- 
13. The number of evaluations completed yearly and the DNQ rate should be part of the overall district monitoring process. Significant increases and decreases should be investigated.

2.5

ARD Committee Meeting Process



Federal and state laws require the Admission, Review, and Dismissal (ARD) Committee process to be the vehicle for the district and campus to collaborate with parents of students with disabilities. The ARD committee considers the evaluation and determines whether the student requires services and supports through special education. Once this determination has been made, the ARD committee works with families annually to identify goals, objectives, services, and supports.

Quality Practices

The district is responsible for implementing a process that carries out and monitors all federal and state regulations related to the ARD meeting. This requires a single data management system that contains all required notices, state-compliance ARD committee documentation requirements, historical and current IEP progress information, evaluation information, and a notes section to reflect parent communication and other essential data.

The person completing ARD committee preparation and ARD documentation should have a workload assignment that allows for time to complete paperwork for the campus's student population. This individual will have the technology skills and expertise regarding special education supports and services. The ARD committee identifies supports and services for students with disabilities, which should align with the results of the evaluation that indicate the impact of the student's disability on access and participation in grade-level curriculum. Implementation is monitored using a process defined by the district. A campus administrator is a required committee member and should serve as the chair for every ARD committee meeting. Teachers will require training in and use a district-defined system to collect data to document progress on goals and objectives. Additionally, teachers need a process for documenting regular use of the ARD-identified accommodations (CFR §300.111, §300.320, §300.321, §300.322, §300.323, TAC §89.1011, TAC §89.1050, TEC §26.0081).

Findings Related to the Admission, Review, and Dismissal (ARD) Process

Austin ISD will need to address several areas to provide quality, compliant services and improve the overall functioning of the ARD process. These needs include a functional data management system, a clear definition of the roles of each individual participating in the ARD meeting, and professional development related to the critical role of the parent in the meeting. The district will need to review the concerns related to the knowledge and ability of classroom teachers to complete this vital task and remain compliant with timelines, documentation, and notice requirements.

An ARD meeting is not just the completion of required paperwork but the thoughtful and intentional planning of a program of services and support for students with disabilities.

- Austin has used several data systems in the past few years and uses a PCG product called EasyIEP. This is supplemented with the district-developed Dashboard and Smartsheets to fill gaps in the EasyIEP system. Campus leaders find Dashboard helpful, and Smartsheet is used to monitor the status of evaluations. Multiple concerns with EasyIEP were described in focus groups and interviews with central office staff, including the product not meeting state compliance standards and not being user-friendly.
- District leadership representatives have met weekly with PCG representatives to address concerns. A list of needed changes has been compiled and shared with PCG. As a result of the continuing issues and the need to meet the TEA Agreed Order for reporting, the district superintendent has allocated additional staff, including a project manager, additional technology staff, and other resources, to facilitate the resolution of these issues. This list of concerns still needs to be solved.
- The district has established the practice of having special education teachers complete all ARD committee paperwork and meeting minutes, which is burdensome for instructional staff and may not accurately reflect the meeting. This increases the number of individuals who must be provided extensive training in compliance and documentation. Concerns were also reported in focus groups that this job responsibility was in addition to instructional responsibilities and was overwhelming to new or inexperienced teachers, especially considering the shortage of special education teachers and multiple vacancies on individual campuses.
- Parent focus group and parent advocacy group comments indicated that progress monitoring of IEP goals and objectives was not consistently provided as stated in the IEP.
- Parents also indicated that data needed to be maintained to document student progress on goals. Parents further stated that accommodations seemed aligned

with the digital system instead of being developed based on the student's needs. Observations of specific students to follow-up folder audits aligned with these comments concerning the lack of documentation for implementing accommodations and modifications. There was also limited documentation of student progress related to the specific goals and objectives of the IEP. In the students observed, the progress reports were part of the documentation; however, the data to support these was not always apparent.

- Austin ISD special education has developed a learning module to support special education staff in documenting progress on IEP goals.

There were numerous positive comments in both parent survey comments and parent focus group sessions regarding specific campus staff. However, there were also comments from parents that described ARD meetings as failing to create a collaborative and welcoming environment where parents are authentic partners. Specifically, twenty-six percent (24.6%) of respondents to the parent survey reported that they disagreed or strongly disagreed that the staff responded to our concerns in a timely and respectful manner. (Question 5) "One frequently expressed concern by department staff and parents is the level of autonomy available to principals in decision-making that seems to supersede federal and state laws related to services for students with disabilities. The statement, "We don't offer those services here – you will have to find another school," was repeated in almost every one of the meetings with parents and parent-advocacy groups. Yet, parents also cited examples of kindness toward their children and themselves and were happy to name the schools.

Additional concerns regarding the ARD process or documentation were identified, including:

- Evidence of the need for alignment between REEDS and ARD documentation.
- Prior Written Notice (PWN) elements were more general than specific and may not have accurately communicated the purpose of the ARD to parents.
- Some inconsistencies regarding PEIMS coding and the schedule of services were identified in the folder reviews.

Recommendations for ARD Committee Meeting Process

Leadership & Organizational Structures

1. Review and revise the job descriptions of evaluators to align with the NASP recommendations of collaborative and supportive relationships with school staff and parents.
2. Create a positive, accepting culture for all students and families, including students with disabilities, and engage faculty and parents in creating norms for behavior and respect.

3. Conduct at least annually a simple parent satisfaction survey to gain insights and recommendations for creating and maintaining strong parent-faculty ties.
4. Provide school leaders opportunities to share their approaches and successes in building effective parent/school relationships.

Capacity Building

5. Ensure that mandatory training on the ARD process occurs annually and is repeated as needed during the year. Options for accomplishing this training may include:
 - a. Face-to-face training on the ARD will be provided by knowledgeable and experienced special education staff, such as evaluators, lead teachers, etc.
 - b. Continue to update, develop, and support online modules. They should be interactive and comply with the National Standards for Quality Online Learning.
6. Provide training for all general and special education teachers in:
 - a. Selecting accommodations that will impact student success and then document that they are being used. Accommodations should align with evaluation findings and student performance.
 - b. Monitoring student accommodations and modifications to ensure compliance with the IEP.
 - c. Identify and provide training on simple ways to monitor progress on IEP goals and objectives.
7. Provide in-person training for the individual who will be completing campus ARD documentation, including Notice requirements and ARD committee deliberations. This training should be provided in person to any individual hired after the beginning of the school year. Follow-up training can be delivered in person or virtually.

Data Systems

8. Campus special education instructional staff (including speech pathologist) continue to use an online tracking system to monitor timelines for annual ARDs or any request for an ARD committee meeting, the Notice of ARD dates and documentation related to any required Notices, as well as providing progress monitoring documentation to parents as established in the IEP.

9. Principals, assistant principals, and executive directors must have access to this same online tracking system for students on their campus/area.

Process and Procedures

10. Consolidate all ARD guidance into a single manual that aligns operating procedures with specific activities that are tabbed and available to all stakeholders. This will be maintained and updated at least annually.
11. Create simple tools and strategies to document student progress on the IEP and the use of accommodations.

2.6

Special Education Monitoring for Compliance



The special education department should operate cohesively and collaboratively to develop and implement practices and procedures to support the district in meeting compliance requirements and delivering quality services for students with disabilities. All district leaders of the department should have a thorough understanding of each aspect of the process and procedures for students with disabilities in Austin ISD. For example, a leader in compliance should have a comprehensive understanding of how evaluations are assigned to staff, just as the leader of the evaluation component should know the overall process for meeting and maintaining compliance.

Quality Practices

School leaders share responsibility for compliance and quality of services for students with disabilities. This is not a special education task alone. Clear lines of responsibility are clear and closely monitored.

The special education data system should utilize the information needed to implement, document, and monitor the provision of special education supports and services for students with disabilities. The system must accurately track and report various data elements in different time windows (monthly, quarterly, semester, and school year). Responsibility for monitoring compliance should be shared across the district between central office special education, other departments, and campuses. Responsibilities for monitoring compliance should be clearly defined by job descriptions and accountable to supervisors (TAC §89.1076).

Findings Related to Monitoring for Compliance

A monitoring system to improve special education compliance requires a comprehensive plan that recognizes all areas that require regular monitoring. This systemic plan must acknowledge that one individual and department alone cannot

shoulder the immense responsibility of monitoring special education compliance. Leadership for effective monitoring must work to eliminate silos of information and spread the responsibility across a range of positions across the district.

Multiple changes in leadership in the special education department have occurred in the last few years. The department has had three different leaders over a 2 ½ year period. As a result, there has not been a consistent and cohesive approach to recognizing and solving issues such as instructional quality, parental concerns, staffing assignments, and areas of non-compliance. This pattern has occurred over the years with multiple leaders, and the compliance errors result from cumulative decisions that have not resulted in a strong, clear, or uniformly implemented compliance process.

Comments during the principal's focus groups indicated that the current leadership has been working on developing a more cohesive department. This group appreciated developing the Dashboard and Smartsheet data systems for tracking student information.

The structure of the central special education department currently creates silos of information and responsibility for supervision and compliance. Evidence includes:

- Multiple guidance documents created by different individuals provide inconsistent directions regarding critical steps in the compliance process.
- Interviews revealed no general understanding of how the special education department operates regarding implementing quality and compliant supports and services for students with disabilities.
- Compliance is assigned as a separate responsibility in the department instead of integrating compliance responsibilities across the various roles. This speaks to the need to reorganize the department to eliminate the 'siloes', even within the department.

The current leadership was appointed in June 2022 and has made significant changes to address issues and concerns highlighted in the Stetson & Associates 2022 program evaluation report. For example, special education coordinators use a principal feedback form to obtain input on specific processes and innovations as they visit each campus leader, and a campus administration survey is disseminated four times a year to gather data on Austin ISD's overall trends and specific individual campus leadership needs.

It is important to note that department leadership has created a monthly schedule of central office staff meetings to identify and address compliance and quality service problems. These meetings have resulted in a more unified understanding and approach. These monthly meetings were suspended over the past few months to provide more time to respond to the TEA Agreed Order. Appendix E contains a summary of the work from this group.

Responsibility for special education compliance primarily rests upon the Austin ISD central office special education department, which needs the authority to mandate specific actions to address non-compliance in the district.

- The TEA investigation report details efforts over three years to improve the compliance status of the district, OSPM, October 31, 2021. The district was unable to satisfy these requirements.
- Interviews with compliance staff reveal concern with the resistance of principals and teachers to follow guidance documents promptly.
- According to focus group comments, not all campus leaders demonstrate ownership of their responsibility for monitoring special education procedural systems to improve and maintain compliance. This concern has been reinforced in various findings and discussions regarding the importance of increased role-clarity across multiple positions in the district. Each leadership job-description and evaluation format must be specific regarding the importance of the principal in leading his/her school as a fully compliant organization on behalf of all students in attendance.
- The TEA order now requires training in special education compliance for all staff.
- Much of the professional development provided by the special education department is provided virtually and needs a consistent mechanism for accountability of implementation.
- The district has implemented a financial reward system for additional work completed by evaluators to address the need to complete a backlog of evaluations and ARDs.
- Focus group comments indicated concern that these same rewards should be provided to other staff, such as related services, SLPs, and instructional staff.

Practices/systems that provide real-time data in a readily accessible format without going to multiple systems are not in place. EasyIEP does not offer monitoring systems accessible to different stakeholder groups, i.e., campus administrators. Various meetings and significant efforts have been devoted to meeting with PCG over the past months. Progress toward solutions has been slow and thwarted by different understandings about the process and products needed to remedy data and compliance issues. To address this issue, the superintendent has allocated a project manager and additional technology support for the special education department and has required weekly update meetings with the superintendent to report on the activities and progress.

The leadership processes of the special education department do not currently provide unification with a central leader who connects all the pieces to support consistent practices and procedures that enable the department to speak with one voice to other departments, campus leaders, instructional staff, parents, and the community.

Recommendations for Special Education Compliance Monitoring

Leadership & Organizational Structures

1. The entire special education central office team needs to meet consistently but no less than every two weeks. An ongoing agenda should allow for updates on the progress of major activities and projects within the department. The team should be comprised of consistent members responsible for key decision-making in the department.
2. Establish an equitable process that celebrates the contributions of all staff for meeting and/or exceeding compliance targets.
3. Special education department leadership should have quarterly opportunities to meet with the executive directors over the campuses to review compliance status and identify future actions to continuously improve the quality of services and student outcomes.

Data Systems

4. As part of the annual special education training for campus administrators and central office leaders, the overall process for compliance should be reviewed, emphasizing the collaborative nature of monitoring requirements and their job responsibilities in the process.
5. As part of the annual training for central office special education staff, the overall process for compliance should be reviewed, emphasizing the collaborative nature of monitoring requirements and their job responsibilities in the process.
6. As part of the annual training for campus staff, the overall process for compliance should be reviewed.

Data Systems

7. Identify/create /modify a system(s) that provides real-time data related to compliance elements.

Processes and Procedures

8. Continue to work to include the compliance elements required by the TEA Agreed Order into the data management system.
9. Identify and develop a chart that provides the position of the staff member(s) in the district who will be responsible for collecting and reviewing specific compliance data items as they

relate to their job function and responsibilities.

10. Establish expectations for monitoring the special education responsibilities of campus leaders.
11. Principals must continue to be notified by special education staff when campus evaluations are at risk of not being completed on time. The central office and campus leaders must clearly delineate and share this responsibility for monitoring timelines.
12. Identify compliance areas requiring monthly or yearly monitoring and create a comprehensive plan to collect, review, and analyze this data through multiple specific reports.
13. All compliance documentation must be provided to the assistant superintendent, who oversees special education's monitoring and compliance process.

2.7

Accountability Systems



Accountability for compliance rests upon a streamlined data management system that addresses all required legal requirements for special education in ARDS and evaluations, which are user-friendly and one point of access to all necessary data related to students with disabilities. Such an information system should provide access to all information sources about special education documentation and compliance. Responsibility for compliance and accountability must be shared between central office leadership and campus leadership.

Accountability for compliance requires a system of collaborative efforts across leadership responsibilities. For both central office leadership and campus leadership to understand compliance areas and to share responsibility for meeting and maintaining compliance, there must be a system of mandatory professional development. Also, a mechanism should exist for stakeholders to provide input into needed professional development. Improving the understanding of the elements of accountability requires multiple opportunities to experience this learning. Mentoring opportunities should be planned for all new staff.

Findings Related to Accountability Systems

Compliance with the implementation of a district's processes and procedures requires a system for monitoring implementation as well as accountability for the roles and responsibilities of each individual. Systems must be in place that define clear expectations for job responsibilities related to overall compliance, a data system that provides real-time accurate data and is easily accessible, and steps that must be taken when there are concerns regarding a lack of implementation of the required process and procedures. This has not been present in Austin ISD, which has led to a multitude of issues related to the provision of support and services to students with disabilities.

- Austin ISD relies upon multiple data systems that do not share information well across platforms. For example, Austin ISD utilized the Smartsheet

system as a project management tool that allows one point of contact that starts with a special education referral. Data from the Smartsheet must be manually entered into the EasyIEP data system to ensure that all the special education processes are done within the federal and state timelines required for student evaluations and the ARD meeting.

- To move forward to remedy the concerns related to the EasyIEP program, Austin ISD's superintendent has established a project management team that is supporting special education that includes a data dashboard that outlines which special education projects have been completed by PCG and the district, which ones are still in progress and which ones are not completed as yet.
- No single centralized location exists to allow the review of existing information on students with disabilities and those under evaluation.
- Campus administrators previously not been able to efficiently run reports to determine the status of evaluations for their students. EasyIEP does not meet legal requirements for special education compliance.
- EasyIEP does not meet legal requirements for special education compliance.
 - The district has developed a data system for monitoring and compliance using Smartsheets and the Dashboard system to accurately report the total number of referrals, ARD meetings, DNQs, and required compliance information.
 - The EasyIEP report writer could be more user-friendly, effective, and efficient for evaluators.
 - Several data management tools are necessary to access all needed information on a student.
 - The only training reported for EasyIEP is online modules.
- The special education data dashboard developed by Austin ISD provides Executive Directors and Campus Principals with information about current student evaluations in progress, how many ARD meetings are coming up, and if they are past due special education evaluations and ARD meetings. Campus personnel are required to check out the dashboard twice a week. Campus principals designate which faculty members can access the dashboard; typically, all the campus administrators on the team and the special education department chairperson have access rights.
- There is no accountability for shared responsibility for compliance with special education rules and procedures across leadership roles in Austin ISD, and there is limited stakeholder involvement to determine the feasibility of following district-created procedures or what training is needed (principals, teachers, evaluators).
- In September 2023, the special education department required all Austin ISD evaluators to use the FIE Writer within Easy IEP to ensure all integrated evaluations are uploaded to one location. Most of the Austin ISD evaluators and parents have voiced concerns regarding how the information is organized and documented in the FIE Writer.

- Austin ISD special education aligned its mission and vision for 2023-24 with Mr. Segura's The Austin Way: 5A's.
- Austin ISD Special Education Support Coordinators are assigned campuses in the district and have started a new feedback loop with campus principals in the 2023-24 school year that includes surveys of what special education support is needed by each of them. This survey will be completed in person four times a year.
- Austin ISD has added two additional professional development days in the 2024-25 school year to accommodate all the required training based on the TEA order.
- Three components that contribute to a lack of monitoring and accountability are the lack of buy-in, guidance documents that are challenging to use, responsibilities assigned as 'overwhelming' to administrators and special education teachers, and stakeholders also lack an understanding of *why* the tasks are necessary.
- To address accountability for the implementation of the MTSS process in Austin ISD, the TEA order requires that district/campus leadership be trained in a campus walkthrough process related to the implementation of MTSS in July 2024 and teachers to be trained in the walkthrough model in August 2024; with one of the requirements being special education staff to be a part of this process.

Recommendations for Accountability Systems

Leadership & Organizational Structures

1. Identify/create/modify a system that provides real-time data related to compliance.
2. A list of needed changes has been compiled by district special education leaders and shared with PCG. The department staff should continue working with PCG representatives to complete the needed changes. Progress or lack of progress toward resolution of the issues should be used in the coming months to decide whether PCG can promptly complete needed changes that will allow Austin ISD to meet all the components of the TEA Agreed Order.
3. Identify appropriate central office leaders responsible for supervising campus leaders and other leadership positions who will be provided with appropriate compliance information broken out by campus. (Results-driven Accountability Indicators, State Performance Plan Indicators 11, 12, & 13, special education referral numbers and DNQs, and timeline compliance information)

**Capacity
Building**

4. Provide monthly in-person training in using EasyIEP or other data systems utilized by the district.
5. Maintain online modules as a reference and backup training component.
6. Programs supported by the district, such as EasyIEP and Goalbook, should be supported by annual training in various highly effective formats.
7. Survey staff annually to assist with planning training for the coming school year.
8. Create a mentorship process for new teachers, evaluators, support staff, and campus administrators to receive coaching on a regular schedule.
9. Create a schedule of virtual meetings to provide opportunities for follow-up questions and updates following online training.

**Processes and
Procedures**

10. Publish a list of central office contacts who can troubleshoot and advise campuses on EasyIEP or the data system utilized by the district issues.
11. Ensure job descriptions identify expectations for performance and the knowledge and skills required to perform the functions of each position, specifically including their role as it relates to compliance with the district's policies and procedures as well as any state and federal regulations that pertain to their position. These descriptions must also identify the necessary steps and training measures that will be required should a staff member have difficulty implementing their required responsibilities.

2.8

Parent Communication & Engagement



IDEA, 2004, notes: “Almost 30 years of research and experience has demonstrated that the education of children with disabilities can be made more effective by... strengthening the role and responsibility of parents and ensuring that families... have meaningful opportunities to participate in the education of their children at school and at home.” The law outlines the school district’s responsibilities for authentically collaborating with parents throughout the special education process. It begins with all elements of Child Find and the evaluation for special education eligibility and services being delivered within the federal and state required regulations, including meeting timelines and providing the notice of the ARD and consent for evaluation being conducted within these parameters.

Parents must be equal partners regarding decisions concerning their child’s evaluation, ARD meetings, and ARD progress monitoring of IEP goals throughout the school year. For families to authentically participate in the special education process, parents must have an opportunity to learn about the special education process, be able to ask questions, and clearly understand the evaluation and ARD process. A critical part of this is accessing information in their native language.

Parents' need for informed consent is foundational to their participation in the special education process of providing services and support for their children. Parent input needs to be respected and valued by the district and campus staff. Parent contributions to the special education evaluation and ARD process need to be incorporated into the decision-making process for their child so that they will be considered full partners in all aspects of decision-making. The district and all campuses can promote these critical partnerships by introducing all the ARD committee members, utilizing ground norms, an ARD Agenda that is followed by everyone, stating the purpose of the meeting, and establishing breaks during the ARD to ask each member if some questions or comments need to be considered before moving to the next part of the ARD agenda.

Parents must receive a written copy of the ARD documentation in their native language within a reasonable time. Non-English-speaking parents must be provided a translator during the ARD meeting to the greatest extent feasible. IDEA 2004 Section 300.332 states: “The public agency must take whatever action is necessary to ensure that the parent understands the proceedings of the IEP Team meeting, including arranging for an interpreter for parents with deafness or whose native language is other than English.”

Other considerations for parents to be equal partners in the process include having the school staff and families participate in training related to Child Find, Special Education Evaluation processes, ARD Meetings, ARD Progress Monitoring, and Conflict Resolution. Providing different venues for professional development opportunities that include virtual, hybrid, and face-to-face options to give families choices of how they want to receive information about special education is critical, and that professional development is offered at different times and in geographic locations that allow parents to participate in these offerings authentically—ensuring that there are interpreters who can translate information into the native language of the parent, as well as providing sign language interpreters to ensure full participation of the families in professional development opportunities.

Schools must actively work to establish positive relationships with parents of students with disabilities through regular communication, celebrations of the child’s success throughout the school year, and school-wide or grade-level events so that parents can ensure their child is involved. Schools should work collaboratively with families to review the results of assessments and develop individual education programs agreeable to all parties concerned.

It is essential to spotlight and celebrate Disability Awareness annually by showcasing work being done on campuses throughout the district as well as the concerted efforts of the Austin ISD central office staff.

Building on existing local partnerships with various agencies and parent special education support groups ensures seamless student support and services.

Findings Related to Parent and Community Engagement in the Special Education Process

There were multiple comments indicating a loss of trust between parents of students with disabilities and the district. This is particularly true among those parents who sought the services of a parent advocacy group or assistance from TEA. As one elementary principal indicated, “My school families have a distrust of school staff because of all of the news reports.” Austin ISD parents must be integral to the decision-

making process that begins with Child Find, special education evaluation, the ARD process, and special education progress monitoring. Parents need to know that the special education system in Austin ISD is a transparent, collaborative process that respects parent input and insights about their child, including information provided to non-English-speaking parents in their native language. District and campus leadership must provide equitable special education programs and services that are delivered with fidelity to all children.

All stakeholders in the Austin ISD district and community must embrace the concept that all children with disabilities are general education students first. Building a district and campus culture that includes celebrating disability awareness and sharing the success stories of our families and students will ultimately acknowledge all our students' contributions.

Austin ISD needs to continue to enhance the work being accomplished with local universities, outside community agencies, and parent and advocacy groups. This will ultimately enrich the lives of the special education students by creating authentic collaboration and transparency and will build trust throughout the Austin ISD school district and community. Recommendations will focus on ways the district may consider actively rebuilding trust with these families. The district must rebuild trust with Austin ISD families and the parent advocacy groups.

Parents' experiences concerning special education services for their child vary dramatically depending on the campus a student attends in the district. Feedback based on parent survey responses and comments, parent focus groups, and parent community advocacy focus groups indicated that special education supports and services in Austin ISD ultimately depend on the campus leadership, their knowledge of the federal and state regulations regarding special education, and their support or lack of commitment to providing appropriate services for students with disabilities.

Nearly 29% of parent survey respondents, reports from district staff, and the TEA investigation report noted that the evaluation process could have been more efficient and effective and that special education evaluations had been delayed over the past several years. Multiple evaluators are often used in an assessment to improve the efficiency of the process and to deal with a lack of evaluation staff, resulting in parents not having questions answered in a timely fashion regarding their child's special education assessment. This has negatively impacted the level of trust and the collaborative relationships when the individual setting up the evaluation is not the same person who will do the testing and, finally, the same person who will attend the ARD meeting. There have been circumstances where the parent reports not understanding why their child is being referred for an evaluation.

Parents who speak languages other than English report that they are not receiving ARD documentation and required notices in their native language and that arranging translation services during an ARD meeting has been difficult.

Professional development opportunities on Child Find and the special education process have been optional for Austin ISD staff; however, the Texas Education Agency Required Order makes such training mandatory in the future, and the district is beginning to develop and implement these professional development opportunities.

Additionally, the district has been engaged in the Parent Power/Empower sessions for families for the past several years which provide opportunities to discuss fundamental topics necessary to families, and families have participated in these sessions; however, parents commented on the fact there was not a face-to-face option for these sessions. Parents also reported that training opportunities should be provided closer to where they reside in the district.

The district has established a new Special Education Family Advisory Committee to hold its first meeting on February 21, 2024. The Child Find information has also been reworked on the district website.

Comments from community advocacy, parent groups, and parent surveys expressed the following concerns:

- The district and campuses do not have a process at all Austin ISD campuses that ensures fidelity of services determined by the full ARD committee are implemented consistently immediately following the ARD meeting, including accommodations and in-class support.
- Concerns about programming for students with disabilities include changes to the dyslexia programming in response to legislative changes.
- Lack of access to general education intervention programs for students with disabilities.
- Decisions the ARD committee makes are sometimes overruled by decisions of campus or district administrators. It was noted that the campus principals have a great deal of autonomy in the district as to who gets access to special education services and who does not get access to the services.
- Progress monitoring reports of the IEP goals are not always provided on the same schedule as students without disabilities receive report cards.
- All school staff members understand and abide by confidentiality rules described by FERPA.
- Parent requests in ARD meetings were not honored by school staff, which promoted a lack of trust between the families and the schools.
- There were comments related to the disparity of services and staffing numbers from campus to campus across the district, with the perception being that more affluent schools in the district are provided with everything that is needed to

service students with disabilities, whereas schools that are not affluent are not provided equitable special education services to meet the needs of their children.

- The lack of transparency, collaboration, and low expectations for special education students.
- It was also noted that the campus principals have a great deal of autonomy in the district and are gatekeepers as to who gets access to special education services and who does not get access to the services.

Respondents to the parent survey reported that the ARD documents are challenging to understand and need to be put into a format that makes them more user-friendly to the parents. The same concern was shared from the parent surveys in relation to the difficulty interpreting the individual students' evaluation results.

Austin ISD is beginning to establish or enhance community partnerships, including the University of Texas Austin, Texas Workforce Commission, Vela Families, Easter Seals, AnyBabyCan, Austin Conference of Texas Parent Association, Communities in Schools, United Way, Coalition for Special Education Equity, ARC of Texas, Autism Society, Down Syndrome Association and AISD School Health Advisory Council. For example, Vela Families already partners with AISD to provide families with professional development on the ARD process in Spanish. The Down Syndrome Association hosts a national conference and would like AISD to participate with representatives at the annual event.

Recommendations for Parent and Community Engagement

Leadership & Organizational Structures

1. Campus leaders will use the Parent Engagement Module required by the TEA order to review effective strategies for communicating with parents before, during, and following the ARD meeting.
2. Have each campus develop an agreed set of norms for an ARD meeting which are posted in the ARD meeting room and reviewed prior to each meeting.
3. Develop a system for random folder reviews on campuses annually to ensure that individual student accommodations/modifications, progress monitoring, and reporting mechanisms are in place.
4. District and campus leadership must emphasize consistent parent engagement and communication.

5. The special education leadership team will work with principals at their principal meetings to highlight positive successes from individual campuses regarding parent interactions, satisfaction, and effective strategies.

Capacity Building

6. Deliver professional development related to Child Find to all staff members in the district/campuses as well as families.
7. Strengthen relationships with outside agencies, universities, and special education parent groups to ensure a more transparent delivery of what services and supports are offered to students with disabilities.
8. Establish a disability awareness program that is celebrated in the district and on campuses annually with outreach to the local media and community about events connected to this initiative.
9. Conduct professional development sessions for general and special education teachers and parents on accommodations/modifications, progress monitoring, and reporting grades.
10. Conduct professional development for families virtually, through hybrid and face-to-face sessions, in order to give parents a variety of ways of participating in special education training with face-to-face sessions being geographically closer to their homes.
11. Provide consistent guidance through published documents and training to communicate the changes to the dyslexia service options, and general education intervention options to families, as there are many misunderstandings about dyslexia support options and general education interventions are available to special education students.

Data Systems

12. Provide user-friendly training and identify options for parent support related to interpreting the individual student's IEP, evaluation report, progress monitoring, and how that data is being collected.
13. Ensure that all parents know about the AISD Parent Portal and that all their special education documentation is there; however, if they need documents printed for them, the district/campus must provide it to them.

Processes and Procedures

14. Provide a campus contact list to each family of a student with a disability that lists staff members that contact related to issues the child may be experiencing on the campus.
15. Provide a system of support and services to students with disabilities that is transparent and compliant with all state and federal regulations.
16. Ensure to the greatest extent possible that ARD meetings and all documentation are provided in the family's native language.
17. Utilize social media (Facebook, etc.) to change the narrative by sharing stories about special education students, teachers, campus, and district leaders who are doing outstanding work delivering special education services with fidelity, or a teacher or student who has done something that positively impacts the campus community.
18. Conduct surveys of parents with students served through special education at the beginning of the school year and the end of the year to measure parent satisfaction with the special education processes in place.
19. Conduct post-ARD meeting surveys asking families about their experiences before, during, and after the ARD meeting and utilize the data to improve the ARD processes. Make this simple using a QR code.
20. The district/campuses can celebrate *Inclusive Schools Week*, which is an annual event sponsored by the Inclusive Schools Network that is held the first full week in December each year.

Conclusion

Given the effort we have observed and documented, Stetson and Associates can conclude this Audit with the belief that the changes required by the Texas Education Agency WILL be accomplished. The essential component of the Strategic Plan, presently under development, must be detailed attention to a quality, compliant foundation, closely monitored implementation across the system, and attention to strategies that will ensure the new system is sustained over time.

In response to the enormity of the tasks ahead, the only concern is the extent to which the full completion of these tasks can be met within the timeframe given. We are convinced they will make every effort to do so.

We thank the hundreds of Austin ISD leaders, faculty members, and parents who contributed to this body of work regarding their concerns, frustrations, recommendations, strategies, and hopes for a better future for the 12,000-plus students with disabilities in Austin ISD.

References

Multi-Tiered Systems of Support

TEA MTSS Guidance

<https://tea.texas.gov/academics/special-student-populations/special-education/tea-mtss-qa-finalaccessible-ppt.pdf>

TEA MTSS Fact Sheets for Families

<https://tea.texas.gov/academics/special-student-populations/special-education/mtss.pdf>

National Center on MTSS

<https://www.air.org/centers/center-multi-tiered-system-supports-mtss-center>

Sailor, W., Skrtic, T. M., Cohn, M., & Olmstead, C. (2021). Preparing Teacher Educators for Statewide Scale-Up of Multi-Tiered System of Support (MTSS). *Teacher Education and Special Education, 44*(1), 24–41.

Sullivan, A. L., Nguyen, T., & Shaver, E. (2022). Foundations of Equity-Centered MTSS. Equity by Design. In Equity Assistance Center Region III, Midwest and Plains Equity Assistance Center. Equity Assistance Center Region III, Midwest, and Plains Equity Assistance Center.

Morris, K., & Feinberg, A. (2022). Collecting Fidelity Data to Support and Sustain PBIS/MTSS in Schools. In Center on Positive Behavioral Interventions and Supports. Center on Positive Behavioral Interventions and Supports.

References for Child Find/Referral

TEA SPED Child Find & Referral Guidance

<https://spedsupport.tea.texas.gov/resource-library/child-find-guidance>

TEA Notice of Procedural Safeguards

<https://tea.texas.gov/academics/special-student-populations/special-education/noticeofproceduralsafeguards9-2022.pdf>

References for Special Education Evaluations

TEA Special Education Evaluation

<https://spedsupport.tea.texas.gov/resource-library/evaluation>

TEA Special Education Guidance on Reevaluations

<https://tea.texas.gov/academics/special-student-populations/special-education/programs-and-services/state-guidance/guidance-related-to-evaluations-review-of-existing-evaluation-data-reed-and-reevaluation>

19 Texas Administrative Code, Section 239.83, Role of Educational Diagnostician

NASP, Comprehensive School-based Mental and Behavioral Health Services and School Psychologists, 2021,
nasponline.org

Ionescu CL, Bințișan M-DB. (2018). Project for the multidisciplinary team and their management in the context of special education. *Palestrica of the Third Millennium Civilization & Sport*. 2018;19(2):123-126.

References for Annual Review and Dismissal Committee Meetings (ARDs)

TEA Parent Guide to the ARD Process

<https://tea.texas.gov/academics/special-student-populations/special-education/ardguidejanuary2021.pdf>

Pierangelo, R., & Giuliani, G. A. (2007). *Understanding, Developing, and Writing Effective IEPs: A Step-by-Step Guide for Educators*. Corwin Press.

Reiman JW, Beck L, Coppola T, Engiles A. (2010). *Parents' Experiences with the IEP Process: Considerations for Improving Practice*. Center for Appropriate Dispute Resolution in Special Education (CADRE).

Kemp, D. M. (2012). Predictors of Parents' Perception toward the IEP Meeting [ProQuest LLC]. In ProQuest LLC.

Burns, M. K., Lembke, E. S., Duesenberg-Marshall, M. D., Hopkins, S., Hirt, S., Romero, M. E., Thomas, E., Steinbauer, J. A., Del, G. A., & Crooks, S. (2023). The Relationship between Quality of the Present Level of Academic Achievement and Functional Performance Statement and Student Learning. *Journal of Research in Special Educational Needs*, 23(4), 365–374.

References for Special Education Monitoring

TEA Parent Guide to the ARD Process

<https://tea.texas.gov/academics/special-student-populations/special-education/ardguidejanuary2021.pdf>

Ruble, L. A., McGrew, J. H., Wong, W. H., & Missall, K. N. (2018). Special Education Teachers' Perceptions and Intentions toward Data Collection. *Journal of Early Intervention*, 40(2), 177–191.

Hauser, M. D. (2017). The Essential and Interrelated Components of Evidence-Based IEPs: A User's Guide. *TEACHING Exceptional Children*, 49(6), 420–428.

Ayala-Meerwald, L. (2020). Teacher Collaboration and Communication during Progress Monitoring of Learning-Disabled Students: A Phenomenological Case Study.

References for Accountability

Kleinhammer-Tramill, J., Karanxha, Z., & Broughton, A. J. (2023). Federal Leadership Perspectives and Role on the Era of Access, Accountability, and Evidence-Based Practices in Special Education. *Journal of Special Education*, 1.

Crowe, C. C., Rivers, S. E., & Bertoli, M. C. (2017). Mind the gap: accountability, observation and special education. *Assessment in Education: Principles, Policy & Practice*, 24(1), 21–43.

Castro-Villarreal, F., & Nichols, S. L. (2016). Intersections of Accountability and Special Education: The Social Justice Implications of Policy and Practice. *Teachers College Record*, 118(14), 1–24.

DeMatthews, D., Serafini, A. & Watson, T. (2021). Leading inclusive schools: Principal perceptions, practices and challenge to meaningful change. *Educational Administration Quarterly*, 57(1), 3–48.

DeMatthews, D., Serafini, A. & Watson, T. (2020). Leading inclusive schools: Principal perceptions, practices, and challenges to meaningful change. *Educational Administration Quarterly*.

DeMatthews, D., Billingsley, B., McLeskey, J. & Sharma, U. (2020). Principal leadership for students with disabilities in effective inclusive schools. *Journal of Educational Administration*.

References for Process and Procedures

Breiter, A., & Light, D. (2006). Data for School Improvement: Factors for designing effective information systems to support decision-making in schools. *Journal of Educational Technology & Society*, 9(3), 206–217.

Westover, J. (2014). Leading Systems change to build district capacity. *Leadership*, 44(1), 24–27.

Experiences in Systemic Change. (2006). *TechTrends: Linking Research & Practice to Improve Learning*, 50(2), 34–41.

Banwart, M. (2020). *Communication Studies: Effective Communication Leads to Effective Leadership*. *New Directions for Student Leadership*, 2020(165), 87–97.

References for Capacity Building

Meeting the Needs of Diverse Learners. Briefing Paper. (2011). In Texas Comprehensive Center. Texas Comprehensive Center.

Capper, C. A., Frattura, E., & Keyes, M. W. (2000). Meeting the Needs of Students of All Abilities: How Leaders Go Beyond Inclusion.

Improving School Leadership: The Promise of Cohesive Leadership. (2009). The Wallace Foundation
<https://wallacefoundation.org/report/improving-school-leadership-promise-cohesive-leadership-systems-promise-cohesive-leadership>

How Leadership Influences Student Learning. (2004). The Wallace Foundation.
<https://wallacefoundation.org/report/how-leadership-influences-student-learning>

Gillerman, J. (2015). Building Capacity: Building on the Special Education Quality Improvement Amendment Act of 2014 by Developing a Framework for a Baseline Offering of a Continuum of Special Education Services in D.C. Public Charter Schools. *Georgetown Journal on Poverty Law & Policy*, 23(1), 107–132.

References for Parent Engagement

Maximizing Parental Involvement in Developing the IEP. (2024). Edutopia, George Lucas Educational Foundation.

Parent Participation in ARD Meetings. (2010) Path Project. <http://nichey.org>.

Guiding Principles For Quality Family Engagement. (2018) Texas Education Agency, <https://tea.texas.gov/academics/early-childhood-education/gpfamilyengagementppt.pdf>

The Austin ISD special education department website also provides links to parent resources. <https://www.austinisd.org/special-education>