

The following pages contain feedback provided to the Texas Education Agency during focus group meetings held between February 6, 2018 and March 2, 2018 in reference to the Draft Plan posted on the Agency's website on January 17, 2018. The feedback was compiled directly from written input obtained by district administrative personnel in all 20 education service center regions. The content of the feedback is presented just as it was provided, with only formatting applied for consistency in the publication.

Other feedback opportunities are ongoing, and persons wishing to make initial or additional comments may continue to do so by sending an email to TexasSPED@tea.texas.gov.

Corrective Action 1 Responses

Barriers or Concerns

- Concerns on Action 1
 - available assessment staff or resources
 - Concern about not having the resources available to ensure that assessments are done on a timely manner (i.e. lack of assessment staff, etc.)
- Documentation forms?
 - If documentation and reporting templates will be used for the review team, when will those be created and more importantly SHARED with districts BEFOREHAND?
- What system are we going to put in place to allow the identification and or evaluation of students suspected of having a disability?
- Who will monitor the internal audit mechanism to ensure processes are done with fidelity?
- Will we have a specific list of targeted components that will be audited during the unannounced and announced visits?
- Since compliance is not the focus of these visits, it is important that LEAs are knowledgeable of the components to be audited.
- Review and Support Team
 - Need to have uniformity and clarity so they can provide guidance as to what it should look like.
 - What will the monitoring teams be looking for.
- Will they be monitoring the RTI process or the evaluation process.?
- How is this going to be funded?
- What will the corrective action plan look like?
- Third Party?
 - Who, what credentials will be part of the Third Party being selected? Any local representatives or will this be another entity out of state who doesn't know Texas?
- Parents need to understand their rights to request services because of timelines that are in place. Once every 6 years is not enough on monitoring.
- PEIMS changes?
 - What changes to PEIMS will be recommended?
- Re: Process Development with Facilitator: Will districts have an opportunity to provide input into the development of documentation and reporting templates
- Public Transparency Reports
 - Will Districts have an opportunity to review the report PRIOR to publication to ensure that all shared information is accurate and not misconstrued and misrepresent Districts
- Unrestricted access to schools
- The general supervision outlined in the corrective action plan provides the allocated funding to solely structure the Texas Education Agency's team. The plan should incorporate how the TEA will support an approach that mirrors the State's oversight team.
- Will team or reviewers receive training? The review teams will include students with disabilities...?
- Will Districts have access to reports/findings prior to them being released to the public? Will districts be allowed to provide clarifications/explanations once reports are completed?
- TEA Visits
 - How and when will districts be selected for site visits? Will districts be contacted in advance?
- Internal Auditing Mechanisms?
- What additional monitoring will occur that is above/beyond already the SPP monitoring program?
- LEA funding to meet requirements.
- lack of definition by TEA in identifying, locating, and evaluating children with disabilities.
- Problems with RTI implementation

- I think RTI has been confused as a prereferral process. Schools think they're "doing RTI" based on a process that is guided by forms. The filling-out-the-forms is seen as equal to "doing RTI." Also there is no training provided to teachers on topics such as selecting the right intervention, progress monitoring procedures (for Tier 1-such as formative assessments), and there is no entry/exit criteria for the Tiers. There is also no distinction as to what are true interventions based on research and evidence-based practices. I think the TEA should come out strong to send the message that RTI is not a special ed initiative and that the curriculum and instruction department should lead the charge to ensure quality Tier 1 practices. Otherwise we're in reactive mode and RTI is seen as a way to get kids into special ed. At the campus level either special ed staff or counselors are "put in charge" of RTI. Everything I have read about this framework indicates that the CAMPUS ADMIN and CURRICULUM dept should lead the charge and that is not happening.
- Staff and funding for LEAs is a huge concern. TEA will receive funds but not the LEAs?
- Why third party contractors? Wouldn't it be more appropriate for the ESCs to provide monitoring and support because they understand the demographics and have built relationships with LEAs.
- Why unrestricted and unannounced visits? We understood that TEA wants to be transparent and build amicable relationships with LEAs.
- Will you post before we have an opportunity to respond? If so, how is that supportive of districts if there are corrective measures to be addressed?
- PEIMS data
 - districts need to know by this summer what data TEA will be monitoring so that procedures and systems can be implemented.
- Dyslexia students
 - Will all the Dyslexia students shift from 504 to SPED?
- Resources
 - Will additional resources and funding be made available to implementation plan?
- Concerns: Will districts receive additional funding to support the implementation of the action plan? The staffing necessary to handle this new process. PEIMS collection increase will cause extra work for the PEIMS staff in each district.
- Data
 - Was there a study of the data regarding districts that were at, or below, the 8.5 "cap"? I really believe most districts took the hit on PBMAS and served their students.
- PEIMS
 - Will there be additional funding for PEIMS staff to be trained and to do the additional work that this will entail?
- Compensatory Services
 - What guidance will be given for districts to provide compensatory services?
- Director of Special Ed
 - In districts where all students receive RTI after benchmark testing if they don't score passing percentage, will this mean that we have to notify every parent and let them know they could possibly be tested for special Ed.
- Staffing shortages for increased referrals. Upset parents.
- Unnecessary increases in advocacy groups. Compensatory services with staff shortages. Paperwork consuming instructional time.
- Disregarding a working efficient RTI system. Disabling a student where a disability doesn't exist
- Peims Data
 - Collection components have led us to the current situation. By following the guidelines set for the LEAs, are we following the correct path?
- If you are staged a 3 or 4,
 - will you still have to do the annual paperwork?

- An onsite visit is not necessary unless desk audit shows continued problems.
- Communication within TEA is ineffective at times, how is throwing a 3rd party facilitator going to improve this? And how is confidentiality going to be confirmed?
 - The practice of instruction falls under curriculum and instruction, but the review and support team is reviewing special education. It feels like special education will get the blame for this. curriculum and instruction should be involved in this process as well.
- TEA doesn't have the expertise to monitor and effect changes in SPED. It is too complicated.
- This is not a district problem. TEA created the problem, they should be the ones to correct them.
- TEA needs to listen and provide feedback instead of sending people who are not allowed to discuss or even provide clarification.
- Current lines of communication with TEA are ineffectual. More monitoring and regulations are not going to improve this.
- TEA visits should be yearly, not every six years.
- support visits once every 6 years
 - I feel that visits should be more often than once every 6 years. Desk audits are good, but only those involved in performing the audit are invested in improving outcomes. With more frequent audits, it would assist the district in staying focused on student outcomes and improve follow through on corrective action. It's like districts jump through hoops to improve STAAR scores, so if you place higher stakes on special ed student progress, more effort will be put in by all teachers, administrators and parents involved.
- Who is going to pay for the third party facilitator?
- What kind of background would the support team have? Would they be trained in the current educational practices for struggling learners? Experts in curriculum? Effective practices that lead to improved student outcomes?
 - The cost that TEA will incur, hiring and supporting the teams seems excessive compared to direct student impact.
- Special education compliance audits and instructional support visits are two separate skill sets, highly concerned that a single team will be unable to provide both of these services within a District.
- PEIMS involves working with another department outside of special education, as well as data programs which often takes extensive time to make any changes.
- After reading through the entire plan there is very little focus on student outcomes but more so on the process and legal requirements which is not what is indicated in bullet 2.
- What will the process be to identify if FAPE was denied? How will that be determined?
- Concern
 - Financing and staffing at LEAS....sp ed staff, PEIMS staff, diagnosticians, etc.
- Funding: finding and funding the needed additional personnel
- Funding - No additional funding to districts but additional funding allocated to TEA for oversight? Is there a way this can be allocated to the provision of services for students directly?
- Too much money will be placed at the top of the chain. Not enough support for the children at the bottom of the chain.
 - Plan does not address the concern of the parents. These "support" visits are really compliance visits.
 - Regular visits take an enormous amount of staff time which in turn takes away support services for the students.
 - Is a third-party facilitator going to justify their need in order to keep a contract going? Why is a third-party needed?
 - SPEDX didn't go well. This seems like another party creating issues that could be an issue with data privacy.
 - TEA site visit - Time and resource intensive for LEA and takes time away from serving kids
 - The timeline for data reporting is a concern.
- Unrestricted access is not realistic.

- Will districts be required to find any student that has been in the system since PBMAS?
- Will TEA notify districts and parents regarding the information they are accessing?
- Report published before LEA can address potential inaccuracies. Need to flip. LEA responds first then publish.
- Confidentiality- how will this information remain confidential under FERPA?
- What will be required from the LEA during site visits?
- Are our ideas and concerns really being heard and taken into consideration?
- Continuity among visits with compliance
- Will TEA be visiting classrooms and if so concerning due to nature of students and importance of instruction
- I am concerned that all of the unfunded mandates contained in the corrective actions combined with the increased bureaucracy will reduce capacity to render services.
- Concern with the word “all” in the corrective action 1 from IDEA wording. Not all students will need testing eg. food allergies.
- Visits should not be disruptive to instruction
- Staff is not adequate to fulfill this obligation.
- How will these monitoring visits improve student outcomes? During DEC visits years ago, there was a focus on compliance and we did not see an improvement of student outcomes from the TEA monitoring process. How will these on site- visits be different?
- 1 makes sense but the monitoring activities don’t support the desired outcomes
- Financial burden to hire enough staff to test all of the students required and we can’t find enough staff under current conditions - we have positions unfilled as it is.
- Districts should be provided the opportunity to review monitoring reports and respond to inaccuracies before reports are made public.
- Upfront training will have to be thorough
- in order to make the best use of the on-site visit time.
- Will the visits be punitive or support?
- Where will TEA find qualified people to “monitor” their LEAs?
- What is the definition of effective practices that lead to outcomes?
- Many good things have been found in the RTI and 504 process and meets student needs. This plan seems to indicate there has been no effort by districts and we are being punished with more oversight. How do we balance and make sure we are being required to test hundreds of students who do not show a suspected disability or ultimately do not qualify?
- IDEA-B finds cannot be used for administrative purposes. How are we justifying this?
- If we have this money, would it not be better served to train ALL teachers in good reading instruction and strategies for struggling learners which can help ALL students and reduce the need for pull out (there is no time to teach them effectively and have so many pull out programs)?
- Can consideration be given to providing personnel to districts to support compliance?
- I know the commissioner said class size is not an priority indicator but what we see is it does matter, smaller class sizes with focus on all teacher knowing how to and providing quality instruction would be hugely impactful. Yet we are running teachers from the profession with inadequate pay and benefits for the time they have to put in to be successful.
- What technical training will those monitoring be provided as TEA was the one who initially imposed the indicator?
- Districts should have the ability to respond before the report is made public.
- The purpose of monitoring visits has to shift to improving outcomes for students with disabilities rather than pages of items to check off in folders.
- Concern related to child find for “all” students including those in hospitals, jails, agencies, and other facilities that have their own restrictions and protocols for allowing access to students when the timeline for the students’ stay may be shorter than the time it takes to navigate their system and clearance/access.

We need support from the agency to help school districts navigate these barriers by imposing restrictions on the agencies if they limit access to the districts that are willing to serve students.

- What is special education actually going to provide for students that are already successful, but parents want the child in special education.
- Unannounced visits
 - Is there going to be training for what is expected before the visits.
- What does the desk top audit look like?
- Reports should not be reported to the public prior to LEA having the chance to view and respond.
- When TEA comes to the LEA will the inquiry be only for SPED or will they be looking into all aspects of the LEA.
- In dealing with SSAs are you going to conduct multiple visit at one time or come at different times.
- In regards to the unannounced visits, that process is extremely disruptive to the educational process. To stop and pull staff to assist a visit is unreasonable and disrespectful to the educational process.
- How will the schools who will be first on the 6 year rotation be chosen?
- PEIMS data collection component, how will this be affected? 3rd party facilitator - criteria?
- Unannounced visits - disruptive, disrespectful, not feasible, distrustful, time consuming.
- Public report should go to the LEA before being reported in the media.
- Third Party Facilitators
 - How are they going to adjust the PEIMs data
- Unannounced visits
- Unannounced visits and unrestricted access: disrupts school day, interrupts student learning, disrespectful to learning process.
- The unannounced access is a concern as school staff has daily procedures/obligations and districts need time to plan for necessary coverage as needed
- Unannounced visits are very disrespectful and disruptive to the educational process
 - What is the PEIMS data collection component piece of the puzzle going to look like?
- Diverse teams of learners list students with disabilities. What does this look like and if they are already involved thru the transition process?
- Published Reports: Districts need to time to respond before published.
 - Concerned with confidentiality with students being part of team of reviewers.
- unannounced visits disrupt the school and do not take into consideration the schedules of others. What if testing or ARD's are scheduled?
- Allow districts to see reports prior to publishing.
- Stakeholder Consultation
 - Special education directors need to be a large part of the stakeholder consultation group
- 3rd party facilitators
 - I am concerned about 3rd party facilitators who may not be experts in education and specifically not experts in special education.
- Consideration for SSA
 - I am the director of an SSA for 5 districts. Please consider keeping SSAs together when deciding the schedule for monitoring visits.
- Why contract and pay a third party? ESC's and TEA should be enough.
- Public Reporting opens the district to greater liability with attorneys and advocates. Districts need the opportunity to fix problems without reporting it to the public
- Review Process
 - In developing the process for reviewing districts, it states that the development process will be done with "significant stakeholder consultation". Please be sure that special education directors are included in this process.
- I am concerned about the language of "unrestricted" and "unannounced".
- Unannounced visits do not allow for districts to provide access to all needed staff.

- Funding
- Diverse team of reviewers
 - I have a concern about confidentiality when using a diverse team of reviewers if it includes students with disabilities. Will this team of reviewers be hired by TEA or volunteers?
- Third-Party Facilitators
 - I have concerns about the number of "third-party" vendors and facilitators that are mentioned in the plan. If Region Centers are a possibility as a vendor - this needs to be made much more clear in the document.
- Public Reporting for Full Transparency
 - LEA should have 30 days PRIOR to monitoring reports being published to the public, not after.
- How will mobility be addressed? What if a student is referred in one district and moves to another district without completing the assessment process?
- Language of Document
 - The use of the terms "unrestricted access" creates an aura of distrust. The connotation is that districts would be hiding something and not willing to work with TEA through an open and honest relationship.
- Districts should have opportunity to review reports prior to public view
- Funding
- With due respect...it is disingenuous, disrespectful and counterproductive not to include funding, in some capacity, at the LEA level in this proposal. To suggest that TEA will require \$17,000,000/year additional funding and not build in significant funding to be appropriated at the LEA level represents a plan w/o collaborative character and frankly a plan doomed to fail.
- Unannounced Monitoring Visits
 - This fosters distrust between TEA and LEA
- Unannounced visits
 - The language stating "unannounced visits" would be used to monitor districts does not seem to take into account the daily schedule of campuses and districts. In order to give the "unrestricted access", districts will need to arrange for the proper personnel to be available. School districts plan weeks in advance and unannounced visits may not allow for districts to be as cooperative as they would like.
- Diverse team of reviewers how are peers to be involved if reviewing other students records
- Public reporting procedures
 - The plan states that LEAs will have 30 days to respond to published reports. Districts should get to see and error-check the findings BEFORE it is made publicly available.
- Guidance
 - Lack of state developed guidelines for Section 504 and Rti like we have for dyslexia.
- If it's not broken, don't fix it. As a former LEA Director, the 8.5% cap was never a consideration in our decision making process as whether or not to evaluate a student. Our decisions were based upon the data we had and student needs. The districts who made decisions otherwise should be the initial focus of the plan.
- Monitoring Concerns
 - What will the audits be looking for? Will visits be announced? How trained will the monitors be? Do they have experience in assessments, evaluating data, etc.
 - When 3rd parties such as Disability Rights come in, will there be additional support for districts.
 - Concerns are that if one district evaluates and DNQs a student, another district may qualify. How will monitors evaluate that?
- What will be involved in the annual desk audit?
- Given the increase in size of the monitoring teams, there is a concern about calibration.
- Districts often took the heat of PBMAS staging to in order to do what was best for our students.

- In charter and small school when getting new students from another school paperwork not in order who gets pointed at for the delinquent.
- Student Reviewers
 - What will be the criteria for student reviewers? Concern about the calibration in this group of reviewers.
- District Response
 - Will the districts have an opportunity to respond to TEA and will the district response be published at the same time TEAs
- concern is published?
- What does the desk audit look like for the district? What sort of things will TEA be looking for in this audit? Will be reasonable in nature and scope? How quickly will feedback be provided in this audit?
- Is there going to be support from TEA and service centers to facilitate the Tier 1 instruction in a way that encompasses the most effective practices for SpEd and General Ed.?
- Who is this 3rd Party facilitator? Is this an objective a third party facilitator?
- There was not a discussion with stakeholders and there is not an opportunity for authentic Q&A.
- Why won't they talk to stakeholders directly.
- We do not feel like we are stakeholders and our voices are heard.
- Instead of putting money into TEA put them into LEAs.
- Is it the assumption that SPED is always the most improved outcome for learners?
- How extensive is the desk audit? Concerns about adequate support to complete and submit yearly.
- The training and experience of the review and support team assigned to monitor districts needs to have adequate knowledge about special education in order to make the assistance meaningful.
- How is the process going to be calibrated to establish consistency for audits and supervision from within the agency and each individual auditor
- high level of expense associated with CA1
- Resources need to be distributed to ESCs or LEAs
- Will TEA find a way to consolidate data into one accountability system such as SPP, PBMAS, etc...
 - Will dyslexia be under the special education umbrella? Will TEA the standardize dyslexia qualifications.
- What will a district visit look like as compared to an annual desk audit
- Is TEA really going to support LEAs or are they looking for ways to document areas of non-compliance
- How are they going to ensure that the focus is not going to just be on processes and legal focus?
 - How are you going to measure this?
 - How are you going to measure student outcomes?
- What type of feedback can the LEA expect to get following the desk audit?
- If dyslexia students are going to be identified as SpEd students, we need more staff, funds, training
- TEA will still be reviewing/monitoring LEAs....every 6 years sounds like an audit
- Will be notified of the audits in a timely manner? What qualifications and school experience or training in SPED do the auditors have prior to conducting the audit?
- duplicate processes: so is this an additional monitoring process or will it replace a current process
- Will LEAs be notified when desktop monitoring will occur?
- How much time is an audit by the review and support team going to take away from the district?
- We do not need too many layers of oversight when funds could be reallocated
- focused on compliance rather than outcomes for kids.... appears to be more corrective/gotcha than supportive
- Why is it now that we are just finding out this is a concern? Is it because the staff at TEA is so small?
- What will funding look in order to conduct extra evaluations for students. The SPED population is increasing anyway and current funding does not cover LEA needs.
- How will each LEA receive the support with a large state, how will a visit every six years be of benefit , perhaps we monitor electronically

- What is the scope of monitoring?
- The length of time of the process (6 years). Consistency may be an issue due to the chance that changes might occur during this time period. How can you ensure fidelity?
- STAAR is such a big impact for all students that students with disabilities are held to same standards as non-disabled peers regardless of developmental weaknesses
- Will it be a blind audit, or will there be specific instructional practices they want to see?
- What are the qualifications of the review and support team?
- What is the workload to prepare for the yearly desk audit?
- How will we know what the 'effective practices' are? How will those be determined? Will they address the student's individual needs?
- What is the actual support that will be provided?? Support, not review/audit
- ESCs need to have the resources and manpower to help support.
- My district systemically implemented district wide interventions which provided support for all learners. This systemic approach assisted all students and put supports in place for struggling learners. Some of these learners were able to get academic support through the intentional implementation of RtI. My concern is TEA may not look at the overall academic gains of all students in our district and will only focus on the number of students who referred, tested, and qualified for Special Education services.
- How knowledgeable and experienced in special education will the third party facilitators be?
- Will the monitoring process take away from the time and supports?
- Will there be a guideline for PEIMS coding?
- Amount of time to get ready for the visit every 6 years is a concern
- Teachers don't like to fill out the paperwork because they are overwhelmed by general education paperwork. Several students are missed.
- How will the third party facilitator be chosen? What are the qualifications? What resources will this take? How much money? Couldn't these resources be shifted to the districts or ESCs?
- what is the measurement... how will it translate between districts and meet individual district needs
- What is the focus of what support teams are monitoring?
- Personnel involved (the 26 individuals)
- What is the feedback that will be received from visit? more transparency needed about these visits
- Will there be enough teachers to be able to support the students with dyslexia? If it goes under special education
- How will they determine the timelines and notifications to districts prior to the audit?
- How do you define "most effective practices"
- The increase of personnel for the Review & Support Team - The concern that Section 504 and dyslexia personnel will not be included and it will be siloed only to include those not highly trained in dyslexia and Section 504
- Define improved outcomes
- What about additional funding for trainings, personnel, and supports for students?
- Local Control - not a cookie cutter approach.
- Numbers will always be lower than other states due to the separation of dyslexia and special education.
- The Dyslexia Handbook has always included special education. It is the compliance and lack of upper level administrative understanding of the guidelines.
- How will the districts be able to meet the requirements with existing staff?
- What does an annual desk audit include? Criteria? Known upfront?
- What additional funding will go to LEAs to process all of the new plans?
- limited eval staff which will impact quality of evals and timelines and DNQ rate
- LEAs should have the opportunity to review the monitoring reports and opportunity to correct prior to reporting to the public
- Unannounced Visits

- This will disrupt the learning and operation of our schools. The visits need to be scheduled and planned so that our staff can plan to NOT have other commitments like ARD meetings,
- Removal of 8.5% cap
 - Now that TEA has removed the 8.5% cap school district's hands are not longer tied when providing for our students. More documentation is not necessary, we are free to serve our students without repercussions from the state in the form of action plans and PBM data.
- 26 people is not enough to complete monitoring as is currently outlined in the CAP
- Unrestricted access and unannounced visits could be detrimental to day to day operations and what is truly in the best interest of students.
- Unrestricted access
 - Unrestricted access will present concerns in our ability to have personnel available at a moments notice.
- Monitoring reports should be given to districts PRIOR to being released publicly. Districts should also have at least 30 days to respond to the reports before they are made public.
- Inconsistencies with TEA messaging (interpretations between people who are on the team) during monitoring visits (as has occurred in the past)
- What are the requirements going to be for the monitoring teams? Will they be educators?
- Apology
 - Accepting responsibility and apologizing would help to heal the rift. Denial of the 8.5% cap and saying the schools are derelict is insulting.
- This is a gotcha! Showing up unannounced
- TEA's emphasis is not disturbing instruction/testing, but this is exactly what the unannounced visits will do.
- Third party facilitator??? Who will this be that works with the escalation team?
- We need clarification on the third party facilitators.
- RTI
- Clarification on the role of RTI in the schools. RTI is an appropriate support to our low/struggling learners/504/Dyslexia is a general ed initiative that Special Education is being held accountable
- Why do we need a third party facilitator?
- The "significant stakeholder consultation" will take away from current roles/responsibilities. TEA is increasing by 26 employees; will the district's employment numbers increase to support this consultation.
- How will one visit every six years directly impact student services?
- What are the parameters of the desk audit? What guidance will we be given to prepare?
- What do we hope to accomplish with the site visit plan as well as the annual desk audit?
 - Are we doing away with PBMAS?
 - How will effective practices be defined? How will you measure and improve student outcomes? Will identified effective practices be shared with all districts within the state?
- Timeliness of the data
 - Sometimes PBMAS pulls from unknown data sources.
- What is the percentage of staff increase requested at the state level and how can that be applied to the LEA?
- One barrier to this corrective action would be how to measure "improved outcomes" when our students have a wide variety of unique needs and circumstances - STAAR performance should not be the primary indicator.
- Resources
 - The resources TEA proposes to spend on additional staff could be better spent at the local level to provide services to students.
- How will monitoring visits improve student outcomes?
- The desk audits---how involved will they be, how will that improve student outcomes?
- Support Team

- In reference to the Review & Support Team. Our concern is that they going to have enough knowledge and expertise to adequately support school districts. For example, large ISDs are not going to look like smaller ISDs or Charter Schools. Our hope is will they be able to spend enough time in districts to make a difference.
- How will general education going to be brought in to the referrals and identification process?
 - TimeThis will take additional time from the LEA to implement the plan, but there does not seem to be a plan for increase of LEA support, only additional monitoring.
- PEIMS
 - What does adjust mean? What personnel would needed to input possible new requirements?
- Support Staff
 - Is the support staff going to be able to second guess district decisions?
- 3rd Party
 - Not a fan of outside parties who are just gathering data. LEA's can provide the feedback. 3rd parties are expensive. Money could be better spend at the LEA level.
- Unrestricted access & Unannounced Visits
 - Concerns about LEA staffing and resources that must be tied up for these visits.
- We are concerned about the amount of funding going towards monitoring, rather than personnel to help out with compensatory services, such as LSSPs/diagnosticians, special education teachers, and highly qualified personnel in general.
- Visits
 - Are the announced and unannounced visits going to be "true" support visits or more work added to the LEA?
- We are concerned that coming only once every 6 years is not helpful.
- Will there be funding to support LEA's with the feedback provided
- Time
 - School officials do not have the time and energy to devote so much time to a visit to monitor what we are trying to accomplish in our schools.
- We are concerned that increasing the number of total staff may not necessarily be effective; it may be more effective to increase the quality of knowledge base of those existing staff serving in this role
- RTI
 - We need more state guidance on RTI like a clearing house. The desk audit should be on the RTI process and not just the outcomes, which is special education.
- What is the product of the annual desk audit?
- What are the criteria for determining a third party facilitator?
- Unfunded mandate
 - This is an example of another unfunded mandate and flow of funds not reaching the LEAs.
- What support and resources will be provided for the annual desk audit
- 3rd party contractor
 - Can TEA not find in-house staff to ensure proper integration of stakeholder feedback? This seems like more money being funneled away from our purpose of educating Texas' children
- Unannounced Visits
 - Unannounced visits would be challenging to accommodate-- two weeks to one month notice would be appropriate. This feels punitive.
- Visits
 - An actual visit seems like a waste of resources if a district was above 8.5%. Using data to measure various areas of compliance has been appropriate. TEA should continue to monitor and measure districts electronically, unless a district is at or below 8.5
- The technology that TEA (that the state is using) is often problematic (i.e. web browser issues, etc.). What resources will be provided to streamline the collection of data?
- Review and support team

- Team members need to be well versed and grounded in Texas Special Education. There are things that Texas does that are different from other states. They need to know the rules and laws of Texas instead of complaining about the laws and rules of Texas so you can guide us in the correct way.
- Funding
 - increase of cost for salaries of additional personnel for TEA-- where will money come from?
- The report is going to be released to the LEAs after it has already been released to the public. Why are districts not allowed to review the report and have time to respond prior to its release?
- Initial Implementation
- TEA indicates that the monitoring system will be completed by January 1, 2019. Training will be done through February, and the first of the monitoring visits will take place starting in March. That means there will be districts that are monitored who have had extremely limited ability to consider the monitoring system as designed and adjust their programs and operations to be oriented toward the specific goals of the monitoring system. TEA needs to plan for this.
- Question
 - 1 Director who oversees review teams of 24 people and then they split and oversee the escalation teams who go out to the most needy districts. If you spend \$3 million, hire 2 directors instead of having 1 person split roles.
- Need clarification on the timeframe for desk audits. Annually? or every 3 years? or depends?
- Is this a true review and support effort in the monitoring process or a "gotcha"?
- Differences in LEAs
 - My numbers are so small that I have a student: teacher ratio smaller in general ed than a larger district has in their RtI program.
 - Many of our RtI procedures and interventions are handled though our gen ed classes and not in a pullout setting.
- Rural district have to provide more service per faculty due to small numbers, so even if a student were to qualify for sped services their programming may not change all that much due to the individualized program already being provided by the general ed teacher.
- Funding
 - increase in cost due to increased staff--where will money come from? There has been no increase or legislative action for increased special education funding. Increase of students, evaluation time and staff will also need to be considered in financial considerations.
- Who is going to fund the third-party facilitator that will come in and ensure statewide stakeholder feedback is properly integrated into the review process design?
 - Monitor training and oversight Past monitoring systems have left districts subject to the specific experience and opinions of the monitors that visited them. Districts had no way to appeal a particular finding of a monitor based on the fact that the finding was not covered by a legal citation or monitoring guide. TEA should plan for how to help monitors use the professional experience in ways that help them fully understand the monitoring process without overreaching the scope of the process.
- Effective Practices
 - When do we get those? How will we know what are effective practices that lead to improved practices?
- Is the money needed to fund this plan coming from district monies?
- Template/Rider 75
 - Who is creating the template and the required documentation and how does this additional monitoring check comply with Rider 75 and the reduction of paperwork?
- Diverse Team of reviewers
 - Will this team of reviewers be reviewing what the current corrective plan is or are they reviewing the findings of a district once they are audited? That's concerning if you have audited a district and then have students with disabilities determine if that is accurate or not?
- Campus Visits

- Unannounced visits could potentially impact instructional opportunities for students and staff in a negative way. (ie TEA shows up unannounced on a benchmark day.)
- Visits
 - What do "unrestricted" and "unannounced" visits actually mean? Are they necessary?
- Is Texas being singled out? Compared to other states?
- "Significant stakeholder consultation"
- How will the funding used to implement these corrective actions impact the funds that are available to districts to actually provide the services required by the plan. (i.e. more testing needed = more time to test = more personnel)
- What criteria is being set to decide which schools are visited and in which order?
- Monitoring
 - Concern is that we are moving back to DEC visits that were previously determined by TEA to be ineffective
- How are small districts going to be taken into consideration? Many times, our numbers are skewed due to low numbers. For example, my sped population of 13% is 20 kids. 13% for Houston ISD is hundreds of kids. Will there be an understanding of the disparity and differences in small vs. large districts? My concern is that if we are all judged by the Review and Support team on the same level, without an understanding of our differences, then an unfair system will occur.
- What are the criteria for the team member who will monitor and conduct campus/district visits?
- Monitoring
 - concern with who the 3rd party will be and access considerations of having a third party involved
- Monitors
 - When hiring monitors, TEA should assure that the bulk of the monitors have the following attributes: 1) They have professional education experience in Texas, 2) They have public school experience, and 3) They have public school special education experience.
- Parent survey
 - The validity of a parent survey is questionable as frequently parents that are satisfied fail to respond and the results of a survey capture parents that have complaints. (too small of a representation).
- Funding
 - how does the allocation of money relate to TEA's strategic priorities?
- Monitoring results
 - district should be given opportunity to respond to monitoring results prior to their public posting
- Monitoring Teams
 - TEA should consider setting up remote monitoring teams. Instead of establishing all monitoring teams in Austin, base some of the teams around the state. Teams based in Houston, Fort Worth, Abilene, and Corpus Christi could significantly cut travel. In addition, a completely different set of professionals might apply for the positions if they did not have to move to Austin and leave their portion of the state.
- Expertise of Monitors
 - The people that are responsible for reviewing the processes of special education need to be people that are actually knowledgeable about the statutes of special education.
- Monitoring
 - There needs to be consistency in monitoring teams with respect to information provided to districts and criteria utilized for monitoring
- Ongoing Training
 - This process is going to create an entire set of knowledge that will grow over time. A very effective way to encourage change across the state will be the ongoing training provided around the state with regard to this process and what and how it works.
- Unannounced visits are a "gotcha" and only reinforce our mistrust of TEA.

- Local District Personnel on teams
 - The CA refers to the possibility of local district personnel being trained and serving on monitoring teams across the state. That is very effective in 2 ways. First, it provides an excellent way to develop well trained personnel to go back and help their districts develop programs. second, it would provide a high quality member to the monitoring team that has a broad base of local ISD experience.
- Vision Statement
 - Consider this as a possible vision statement for the R&S monitoring teams:
 - The mission of the R&S Teams is guided by research based monitoring principles which focus on clearly established and previously existing written expectations for special education programs and follow after statewide training and implementation of these clear programmatic issues. R&S teams use properly designed sampling techniques to assure that the picture generated from a sampled review is likely to properly and accurately represent the status of the whole organization. Thus, the mission of the R&S teams is to accurately research and then describe the efforts of the LEA in their efforts to implement the special education program for their students with disabilities. TEA and the R&S teams themselves stand ready to celebrate with those districts which are implementing quality programming for their students with disabilities.
- TEA & Responsibility
 - If TEA wants districts to take their efforts seriously, TEA should consider standing up and stating publicly that their actions over the last 12 years were a primary factor in our state being in the current situation.
- Manpower, money, time
 - Schools can't even keep up with referrals and testing right now let alone go back and try to retest students from past years.
 - Costs
 - Why do we need a third party facilitator? The financial drain for that will be huge
 - Clarify the PEIMS data collection
 - concerns of only looking for problems still isn't solution based
 - school district resources will be used to "get ready" for compliance visits and not for doing what is best for kids in our classrooms.
 - Where will the compliance visits for general education be? For inclusion? For differentiation?
 - We feel like we are paying for mistakes that we did not make.
 - RtI process was not ever defined or paid for
- You have increased the size of support teams at state level, but what happens to LEA's who have to implement- Where is the support at the local level.
- Completing multiple annual desk audits for districts that are part of a SSA will be a large task for SSA staff and director.
- Action 1
 - Is there going to be more support and guidance prior to monitoring?
 - Are they going to tell us what we are doing wrong, or is there going to be any guidance.
- Previous suggestions in monitoring have been unfunded and unsupported.
- How are the individuals hired going to improve student outcomes?
- How will this impact SSAs supporting multiple school districts? Within a 6 year cycle they could be continually involved in audits. One of our SSAs has 10 districts. We need clarity on what this looks like. In addition to Coorrective Action 1, we still have PBMAS, RF Tracker , SPP indicators, and various other audits to continue. Support and staffing are major issues.
- TEA has funded their support systems, but not funded districts who are having to implement these things.
- How can we control what general education does in getting referrals to SPED?
- Another unfunded mandate- where is the support.
- Tea is going to come in and monitor, but what does the support look like on a district level. How do we become innovative when we are overloaded with mandates.

- Licensed and certified evaluation personnel hired to review, identify the scope of the problems may be a better and more responsive action than financial resources poured into monitoring.
- More specific criteria for how to serve thru RtI. It seems that every campus defines their own RtI.
- There is concern about ESL/LEP referrals. It seems that general education refers bilingual students who are going through the natural process of dual language acquisition. Gen Ed wants bilingual students to have the same English standards and monolingual English speakers. Gen Ed refers and SPED finds that there is a language difference rather than a language disorder or learning disability.
- We do not believe in the third party process. Funds will be misused hiring outside agencies.
- Funding
 - We will not have the staff or funding for the increase in testing. How will we cover areas of need when everyone is pulled to do testing. Even if we have funds how do we find staff.
- use of 3rd party vendors
- If there is additional PIEMS work to be done, where is this manpower coming from?
- TEA is increasing their support team size, so will LEA's be provided funding for increasing their support team?
- Will the members of the Review and Support team have a background in special education?
- Who are the significant stakeholders that are a part of the consultation?
- Ditto on increasing support at state level does NOT help increase support at local level
- Better college level teacher training for Gen Ed and SpEd teachers.
- What will be the expertise level of the people on the compliance teams? Will they have had long-term experience in special education?
- What will be provided to make sure everyone is adequately trained?
- If a district is visited year 1, will the same district automatically be visited year 7?
- accountability systems have consequences for identifying students for special ed services...disproportionality, STAAR Alt participation, LRE setting codes, discipline, sped performance singled out in STAAR performance
- RTI is for everyone not just struggling students, because it's law we can use it but we are now going to be punished for utilizing it
- Not the whole state is under the 8.5%, and thus not all districts need to be monitored.
- There is a disparity between large districts and small districts. Small districts often are over the cap because we are proactive in identifying any child that may need services so why should they be for under ridden
- unrestricted access to school and staff (what about assessments days, staff absences, staff shortage to consider).
- Review Teams
 - Students with disabilities cannot review the records of other students with disabilities.
- Review Team
 - Should not include students with disabilities - this is a confidentiality concern
- parents who have not been denied anything but take opportunity to air unrelated grievances
- Unrestricted access
 - No unannounced visits. How are we supposed to meet the needs of our scholars if we are randomly pulled out?
- Unannounced/Unrestricted Access
 - Not feasible or advisable. Monitoring teams will waste time. Students will be left without good instruction with no advanced notice that the teacher will be out.
- Monitors
 - Background of monitors must understand federal and state special education requirements. Out district people already know this.
- Monitoring Reports

- Monitoring reports should not made public until AFTER the period for response and revision is complete.
- Unannounced Visits
 - These will cause a loss of instruction time, service delivery to students as especially small schools will have to have their personnel to address the monitoring teams questions and need for verification. This could shut down several classrooms due to having to pull SPED teachers, dyslexia teachers, RTI teachers, etc. This would happen as iwe do not have time to get things together, schools will have no choice but to pull those people. Many of us are in co-ops that the "official" documentation is not even located on campus.
- PBMAS, State Performance Plan, Disproportionalityall are consequence based accountability plans and are duplicate reportings
 - PBMAS still sets arbitrary caps on special ed in all areas of service and identification
- Controls
 - Districts were blamed for following the rules from TEA. More internal controls needed for TEA
- Concern about the structure of the visits over 6 years and feedback.
- Unannounced visits -- concern because seems hidden not supportive in nature
- Publicly reported monitoring -- there should be a negotiation process, work with district, publish only after plan to achieved
- SSAs
 - When doing a monitoring visit, do all districts involved in that SSA at the same time to avoid putting an SSA through this every year.
- Publicly reported -- complete report with positive and corrective actions
- Every six weeks-- every district? What is that? Who will be submitting? Sounds very heavy handed and time consuming.
- How will this happen in an SSA? Anyone at the same time or one at a time?
- What data will the review and support team review? What is going to be involved in the monitoring report?
- Monitoring visits
 - These sound like the old DEC visits that all districts used to suffer through and even then they did not find that the majority of districts were out of compliance. Very stressful event for all staff. With the teaching shortage currently in Texas (yes there is really one) this will not help us to bring people into the profession quick enough to replace the retirees that this will cause.
- Guilty
 - It sure seems like public schools are guilty until proven innocent. "Derelection of Duty" Private schools do not even accept these students
- A peer review approach should be considered. Districts are going to have to have guidance. The funds required to hire all of the new monitoring personnel could have been used to improve programs
- Training for PEIMS
- Funding
- Need transparency and tool for self-monitoring immediately
- Appropriate personnel
- Appears what funding is available is going to TEA & staff, instead of going to the schools
- Only checking for compliance versus impact of program for students
- Mostly concerned that the whole state is being held responsible for 1% of Texas schools being out of compliance.
- TEA staff will be expensive
 - Money will be needed on campus levels.
- Financial Support
 - In the event the corrective action opens a floodgate of new referrals, is there a plan in place that will support districts' financial needs during this process?

- Local districts will be further financially burdened by extensive additional evaluation and assessment.
- Agree that funding TEA staff will not accomplish what needs to happen at the LEA/campus level. Money needs to be appropriated to the LEA/campus to ensure additional staff/training are available.
 - Need to make sure monitors hired by TEA are experienced educational practitioners.
- Consistency
 - Are the most effective practices consistency across the state or does each LEA come up with their own.
- Where is the professional development? How are we going to pull in general ed. staff? This is all falling on the special ed. staff. Teachers and administrators still
- need training on RTI.
- Fidelity
 - Is one month really enough time for proper training of those who will be going to districts to be trained to do a good job? Are these site visits being done just to check it off or will they be provided enough time to thoroughly examine each campus?
- Concerned that the added support team will be punitive for districts instead of guidance.
- Consider peer reviews as a means for the monitoring process.
- How do we ensure training for all LEA's will be provided?
- Statewide common vocabulary mandated needed for RTI
- What does RTI look like? Framework needed
- Any framework developed includes all sub populations.
- Upon visits to schools; is this going to be looked at as a support review or will schools be held to fire to become compliant?
- what are the implications of the district visit? Accountability? sanctions?
- How soon will we receive the review process?
- Corrective Action 1
 - What does the annual desk audit consist of?
- What is the current size of the Review and Support Team?
- What sort of guidance will be provided to support the most effective practices? Will funds be available for extra staff at the campus level so that these practices can be implemented?
- any funding available for these "best practice suggestions"?
- Feedback
 - The communication will be between state and region stakeholders and it will not feed down to districts
- funding
 - resources--personnel, limited budget, limitations for spending federal \$\$.
- will stakeholders from Region 18 be a part of the stakeholder consultation? Many times only metropolitan or districts surrounding Austin are included
- PEIMS data - who will be a part of creating the changes
- Will we receive increased funding for staff at the LEA level?
- Will we have a desk audit this year? When will the yearly site visits begin?
- What will a visit consist of? How will this help us meet student needs
- How much time will we have to prepare for the audit or on site visit?
- Will sanctions come from the onsite or desk audit?
- Visits are usually punitive...and take time away from planning for students Isn't this counter-intuitive?
- If you will not be using indicator 10, will SpEd still be used for staging and what multiple criteria will be used?
- How soon will they adjust the PEIMS data collection?
- Can't we use the multi million dollar price tag to serve students better?
- Will TEA utilize an RFP to determine the third party facilitator?
- How will TEA quantify and share out the most effective practices that improve outcomes for students?

- What stakeholders are TEA referring to when discussing significant consultation?
- Charter schools (and private schools input) should have minimal input since they serve (& can choose) minimal SpEd populations.
- When will districts be notified of their visit?
 - Will TEA be providing reporting templates for districts to use?
- Third-party facilitators
 - What are the requirements TEA will be implementing to ensure quality people are hired for these positions so that they are able to provide appropriate guidance to school districts?
- A concern is when there are support visits, they step beyond the original parameters for the visit.
- How can we ensure that everyone in the community receive the information on child find? Currently we provide information via District website and West Texas Carrier.
- Review and Support Team: If we are scheduled a visit towards the end of the 6th year, how does the District know if our plan of actions and implementations are effective? Can visits be done sooner and more often?
- Manpower
 - timeline of every 6 years too infrequent.
- 6 years between visits is too long;
- Why should an LEA be subject to a support visit and desk audit
- Concern: Is TEA going to provide guidance on what the ARD committee should consider in order to determine whether or not a student should receive compensatory services?
- Why should an LEA be subject to a support visit when their percentage of SPED students has been aligned with the national average and not the 8.5 State number.
- What will the portfolios contain for the desk audit? How often will LEA provide the information for the desk audit?
- What is required of the LEA in regards to informing parents of the TEA monitoring visits?
- Will there be rubrics developed to provide guidance to districts with regard to the support visits?
- Will Districts will be able to respond and correct audit findings prior to published report?
- Openness:
 - Barriers will be placed regarding openness and willingness to gain support.
- Concern: We are concerned with proposed “unrestricted and unannounced” access to districts and classrooms. It seems punitive and not supportive.
- Barrier: The staff time that will be required in relation to this action in terms of data collection; potential monetary costs as well.
- Concern: Districts not being able to review the monitoring report prior to it being posted publicly.
- Concern: In the past, monitors visiting districts have not been well-versed in (or in some cases possess basic knowledge) regarding special education current best practices.
- Concerns: The lack of a state Special Education director.
- If timeline begins immediately, all districts will be found to need an onsite visit. Districts should have an opportunity to implement CAs before monitoring begins.
- Concern: The State should develop and articulate best practices/expectations for child find. TEA should allow districts time to comply before monitoring and visits. At least 1 year.
- Concerns: What are the on-site visits going to be looking for?
- Time for compliance? 3rd party vendors providing technical support to districts? How will we be assured that the 3rd party vendors will provide quality, compliant technical assistance
- Concern
 - Is the support going to be proactive, or retroactive??
- Concern: What are the qualifications of the monitoring team? Will they have a Special Education background.
- Lack of funding. Time!! Reporting should not be made public until district has had opportunity to respond.

- TEA needs to have plan and districts have a year to implement before audit.
 - Concern: What are the "diverse team of reviewers" going to review?
 - Concern: Will students that were previously tested and DNQ'd going to now be subject to re-evaluating if they're now covered under 504? Or even if they're not in 504 but participating in interventions
 - How long will the Escalation Team be in existence?
 - Will there be an annual desk review during the summer, or during the school year?
 - Addition: District and ESC staff Special Education allowed to sit in with TEA monitors during any onsite visits for purposes of assisting with identifying data, systems, etc.
 - Idea: Involve Special Education Directors in the selection process for the TEA special education director and for the additional staff that will be hired to support districts.
-
- Financial
 - Allocate
 - Sped Director
 - TEA is setting monitoring visits without clarifying the parameters for these visits.
 - Will the personnel in the support team be knowledgeable in SPED?
 - Lack of funding to adequately implement new mandates is both a huge barrier
 - RTI
 - RTI Inconsistencies
 - Reports
 - LEAs should be given 30 days to respond to findings prior to them being publicly reported.
 - Third Party facilitators
 - Funding concerns
 - Instead of TEA increasing the number of staff to conduct monitoring visits, those funds could be diverted to LEA to do self-monitoring reports.
 - Financial
 - Why would TEA add \$84,485,000 to their budget for support in the Corrective Action, yet not budget funds for LEA's? The boots on the ground will be within the LEA's in order to assess, monitor, teach, etc...
 - SPED Director: The use of confidential interviews with any and all stakeholders as well as a "diverse" group of reviewers may lead to skewed feedback as some of these individuals may not fully understand the special education process or purpose.
 - Concern is that TEA is increasing its monitoring but money would be better spent helping the LEAs by increasing staff to help evaluate students with disabilities.
 - RTI
 - Please define the cyclical use of RTI and how we are to constantly enter peims codes for each student, in each subject as they fluctuate daily, weekly, monthly?? Is this consistent for every district? Who will do this and where will the funding come from for this FTE?
 - Unannounced visits
 - Unannounced visits will disrupt the learning environment and processes for students & staff
 - SPED Director: Having the reports released publicly with no opportunity for the district to review it and no opportunity for correction or clarification seems unfair. Districts will be held captive by the public court of opinion before ever being given a chance to respond or comply.
 - the lack of trained staff to adequately assess
 - TEA should not be allowed "unrestricted" or "unannounced" visits to LEA's. There is no definition for the purpose of this type of monitoring visit and how that would actually improve "student outcome".
 - Cap issue
 - OSEP charged TEA with correcting the issue of the cap. Recently, TEA has remedied that issue by removing the PBMAS indicator. In Corrective Action 1, TEA has misinterpreted the intent of

what was being said by OSEP because they had already addressed it through the removal of the Cap.

- Sped Director
- Are PRIVATE and CHARTER schools going to be held to these same Parameters?
- even with funding provided, qualified trained staff may not be available
- Unrestricted access with unannounced visits can be extremely disruptive to the instructional day
- Slow learners
 - Slow learners may not have a disability but need continuous RTI rather than special education services for success
- For one, what does it mean to suspect a disability? Given the many factors which can negatively impact a child's capacity to progress in the enrolled grade level curriculum, every struggle is not necessarily an indication that there is a disability. The influence of determinant and exclusionary factors such as opportunity to learn, poverty, and mobility must be considered. If a district does not suspect the struggles to be a result of a disability, then there is not an obligation to evaluate. Evaluation staff and referral teams waded cautiously through this aspect of Child Find.
- Sped Director
- Focus should initially target districts that have been consistently 8.5% or under for Indicator 10.
- Some districts are under the 8.5 they should be monitored first.
- what is the protocol and procedure to locate and identify students that are suspected of having a disability?
- Will SSA's be looked at as a whole or will each LEA been seen individually.
- If TEA's goal is to improve "student outcome" then LEA's should be provided the time and information to adequately address any reports PRIOR to any publication of reports.
- Director of State and Federal Program
- Who are these third party facilitators? Is the gov't bringing more people, that have been far removed from the classroom, into the LEA and allowing them to make decisions and judgments regarding education? When did educators start being unable to make decisions about education?
- We are concerned with the amount of money and resources that will be going into monitoring schools. Monitoring and directives from TEA are the reason we are in this situation as a state, and not a lack of monitoring. It would be much more feasible to allocate that money directly into the school districts, or even the regional resource centers, to provide support to districts.
- TEA should define "student outcome"
- TEA states that they want to "help students" and avoid focusing on compliance, if this is the case, then WHY is ALL of the personnel hired at the state level and NO funds are allocated in this plan to allow LEA's to hire additional staff to adequately address the concerns of this plan.
- How will the visit rotations be determined?
- What are the credentials for the new staff that will be hired by TEA? Will they have experience in special education or experience in Texas?
- To qualify for Special Education you need an educational need. TEA needs to define this.
- What will the credentials of the 3rd party facilitators?
- Financial
 - Local LEA's need to be provided with additional financial resources in order to meet the demands required by Federal mandates.
- Parameters of Audit
- Will the years targeted for monitoring be driven by parent input or will it begin with TEA's implementation of 8.5%?
- Aligning TEA's definition of dyslexia with the rest of the country
- Small Districts are forced to split resources between students with dyslexia who qualify for SPED and those who are dyslexic and qualify for what amounts to specialized instruction--but are served under Section 504. Will TEA place dyslexia under SPED in order to streamline the services and process for

districts? It's difficult for SPED departments to meet compliance without oversight on Section 504 and even RTI.

- Only some efforts supported
- How will TEA determine which corrective actions will be financially supported and which will become the financial responsibility of districts?
- Communication regarding the actual disability. Making sure that the area of eligibility is correct for students. Would like to see more consistent communication about these issues.
- When will districts be informed that they will be audited that year
- The state verbiage and communication around RTI should be aligned to the national best practice model - all students receive the benefits of a strong RTI approach - it is not a program or process for "some" students. Consider becoming an MTSS state.
- Action 1: Suggest training would be uniform so we have consistency between team. Be consistent across the state.
 - Money allocated for training team at the districts.
 - Make state wide feedback clear . How are voices at district level heard at state level.
- Concerns Corrective Action Plan
 - The focus is on monitoring and compliance at the district level by the state and the sole funding is provided at the state level. Implementation will require funding at the district level.
 - Additional funding would be needed for assessment staff, teaching/ support staff, and legal and compensatory service funding to support newly identified students.
 - TEA would need to create a funding source in addition to the current special education budget to support districts.
- 6 year
 - 6 year turnaround to make any changes is too long.
- Districts have spend a lot of time and money trying to reduce numbers based on the PBM indicator, now there will be a need to control over-reaction within the districts to push all struggling students to evaluation.
- Director of Special Education
 - Monitoring seems to be a theme. This plan should have a message of support. This seems to be one more monitoring attempt to break into districts.
- How will determine who they will hire as a third party facilitator?
- If new change, every district should be monitored in a shorter period of time than the 6 years.
 - Within the first year every district should have a state monitoring component
- Barriers
 - If each district only gets one visit per 6 years, how will TEA accommodate districts who require or request more frequent visits? Is it reasonable to provide same support to all districts when each have differing needs
- PEIMS timeline for training district departments on these new changes and components
- Data collection at the district level and should TEA monitor PEIMS annually.
- Reviewers
 - What are they reviewing
- Adding members of a review team of people without expertise in the area being reviewed is counter productive.
- Stakeholder input is fine, but that is not the role of a review or oversight team.
- How does the use of third party facilitators promote success of this action
- I think it is important that each district receive a monitoring visit. I agree with the 6 year timeline.
- Concern that we will return to a TEA gotcha mentality after several years of moving to change that mindset.
- Budget

- Is the additional staff to TEA going to reduce the LEA's IDEA-B allocation for the general program operational budget
- Mental Health Services
 - Will TEA conduct vetting services on their recommended resources or will that responsibility fall on the School districts?
- Action 1
 - Do all children retained need to be SPED tested?
 - How does the RTI to SPEE testing work? Who determines when interventions aren't working or is it a time period? If they are tested for SPED and DNQ do they go back to RTI? Do we need to redo the cycle every 6 months?
 - Are there plans for funding for 504 for increased population due to kids DNQ SPED but meet qualifications for 504?
 - Will there be funds for possible lawsuits due to lack of identification
- Criteria
 - We need specific criteria for which 504 students need to be referred
- Will there be a Best Practice Guide and recommended Resources for Districts to use? When will Districts be notified so that they can adjust their district's processes?
- Diagnostician Workload
 - What is plan for funding and adding additional evaluation personnel (diagnosticians, LSSPs, etc) ? We already have a terrible time finding qualified applicants. How will we find and fund additional personnel?
- Spec Ed Negative Connotation
 - How do we handle the negative connotation parents may have toward having their child tested for special education?
- Special Ed Director
 - Will funding be increased for Special Education testing?
- Director of Special Ed
 - You are stating that we are to go back and look at the students that were tested and did not qualify, are saying that if they are still struggling we have to put them in Special Ed. even though testing showed they do not have a learning disability?
- Funding is a major concern! We are already underpaid and overworked and majority of educators are doing what is best for the kids regardless of being hit on PBMAS for being over the 8.5% cap. Millions of dollars will be spent for this corrective action plan and none of it will go to the districts to provide what is needed for our students. Aren't we all in this field to help kids??? Diagnosticians are given guidelines to follow when diagnosing learning and intellectual disabilities, and given a cap, and have to determine if there is a disability does the student need specially designed instruction..... doesn't this seem like so many rules to follow on top of everything else and all we really want to do is provide help for the students who are struggling. So identify and qualify students with disabilities and provide services without the cap, that is what we were already doing...

Ideas or Solutions

- Ideas for Action 1
 - Similar to the oversight structure assumed by the Texas Education Agency, the State should allocate funding to school districts (big and small) so that the general supervision of campus identification and evaluation of suspected students with disabilities are receiving the attention and intervention needed. The State should monitor this implementation to ensure consistency state-wide processes.
- More frequent monitoring and assurance that parents of understand their rights under child find. Parents or stakeholders should be able to call TEA and make anonymous reports of violations.
- Recommendations:

- Identification of the RtI process: will it be a documentation process or will it be an additional responsibility on a staff member (i.e., diagnostician) with more of a focus to RtI?
- Announced and Unannounced Visits
 - What is the timeline being considered for both types of visits, with consideration to the Districts for all their ongoing monitoring and reporting submissions. Can't this be part of the current TAIS process?
- RTI Guidance App
 - I recommend the TEA make districts aware of the free TEA RTI Guidance app and the state's RTI website Building RTI Capacity.
- Monitoring should include LRE RTI and 504 program services and records. There is a lack of program implementation of intervention services that do not adhere to any compliance standards.
- Audits should include a mandated training/meeting with campus level administration to review audit findings and expectations.
- Misconceptions of RTI
 - TEA should clarify what RTI is and what it is not. What it is is a school improvement model. What it is not is a prereferral model guided by forms
- Funding?
- Replace RTI
 - If your suggesting that RTI isn't allowed to delay or deny for SPED testing, then what process or system do you recommend?
- Why annual desk audits on top of visits every six years? The annual desk audit seems redundant. Why not have a measure that if the district passes the desk audit, then move to every other year.
- Has TEA considered paying for/developing a common data management system (e.g. eSped) and have the liaisons monitor districts through the standardized data management system. Increased funding
- College/trade readiness in real life environments Training in RTI for general Ed educators
- Salary increases to keep and attract sped teachers Instructions on providing and delivery of compensatory services
- Guidelines on initial sped referrals
- Wouldn't it be more appropriate to have ESCs assist with monitoring as they have an understanding of the regional demographics and have relationships with districts?
- If there is no need to visit a
 - District, then there is no need for an onsite visit. Unnecassary on site visits will be a waste of money
- Get general education administrators and teachers involved
 - At this point, staff are looking at the special education director for guidance on what special ed is going to do about it. They do not currently understand that this is a general education, campus based issue that they will need to address and correct.
- Two separate teams: a team highly trained in compliance and review and a 2nd team highly trained in support and instruction.
- Instead of spending money on 3rd party vendor lets spend it on our students.
- Use technology instead of hiring auditors for the six year support visits. And use the funds to help districts provide services to children
- To have a consistency of forms or software to ensure that we are compliant with their expectations within the different programs with disabilities.
- To have clear guidelines on Dyslexia/504/RtI and expectations/criteria for eligibility in each of those areas. Consider using software to help so that everyone is consistent statewide.
- We recommend TEA do self-audits and send to TEA to save on cost and shift the dollars to programs and services.
- Put the money where the kids are. Direct funding for the students.

- The money saved using more electronic auditing could be used to fund additional evaluation personnel and student services.
- Can districts see/review the monitoring report before it is posted publicly?
- It would be helpful if the state consolidated the sped tech system so we were all on the same system/data.
- Region Center Support
 - Can monies be allocated to our friendly region center so that they can provide some of the support services? Relationships are already established with districts.
 - This could cut down on travel costs at the state level, etc.
- Provide a ration for student services such as 85% for direct support for the students and 15% for administrative overhead.
- Consider self-audits...TEA could provide tools to support self-evaluation, with submissions to TEA under certain conditions
- Onsite reviews only offered when there is a significant evidence of non-compliance: PBMAS, parent complaints, etc.
- Consider partnering with universities to assist with audits; training would be a consideration
- Consider a gradient scale and if a district does not raise any red flags or scores a 5 out of 5 then they do not have to have a site visit from TEA. This would free up time for staff to serve students instead of gather documents which were already found to be appropriate.
- 3rd party outsourcing needs to utilize ESC staff.
- 3rd party vendors
- Announced visits help schools to ensure that the learning process is not interrupted while needed staff is being interviewed.
- In place of on-site visits
 - There are many districts that have been doing an excellent job of supporting their students in special programs. Instead of every district in the state having an on-site visit, would it be more appropriate to START with desk audits for everyone and use that data to determine who needs an on-site visit or a visit from the "Escalation Team"
- Focus of Folder Audits
 - Will ESC staff, and the PGC Network (and other appropriate networks) also be trained on the guidance the support team will give regarding "most effective practices that lead to improved student outcomes"?
- Team of reviewers could include former students not current students.
- Include Special Ed Directors in all stakeholder groups.
- Visits should be announced.
 - LEAs should get report and have a chance to meet with public before it goes to the media.
- Action 1
 - There will be a need for training on TEA expectations and documents. Training needs to be through webinars.
- We need some guidance as a district prior to audit.
- Put a process in place that the district can follow.
- Utilize the ESCs instead of outsourcing to outside vendors.
- Utilize Region centers rather than 3rd party vendors
- Agree with ANNOUNCED onsite visits periodically or as needed when districts are found to be non-compliant
 - For those of us who have been doing an excellent job, it seems unfair to go through this process as if we have done something wrong.
- Consider a Guide/Template
 - For the visits, will we know what the team is going to be reviewing? I am thinking back to DEC visits and remember knowing exactly what the expectations were.
- Funding

- Include an annual 25% “set aside” in any appropriations to TEA related to the corrective action plan to be used at the LEA level. Criteria for distribution to be determined once the plan is finalized.
- Guidelines
 - TEA developed handbooks for Section 504 and Rti like we have for dyslexia through practitioner focus groups.
- If it’s not broken, don’t fix it.
 - The districts who made decisions otherwise should be the initial focus of the plan.
- No all districts use the cap as a final number, but used it as a guideline and felt that all students regardless of our numbers needed to be serviced to ensure their success.
- Funding
 - Funding set aside specifically for assessments is needed.
- Eligibility
 - Definite needs state wide guidance for eligibility for identification.
- 10 years ago every student that had a struggle was referred to sped which often resulted in over identification. We are concerned this effort may result in something similar. .
- Accountability
 - Student should not be identified and then have to take the same assessment all regular ed students take. Remove the 1% cap for STAAR ALT 2.
- Share outcomes that work or that are effective with districts before districts are evaluated on them.
- Rather than a audit the focus of visits should be driven by improving outcome of students that is attached to TEA resources that districts have access in order to ensure needs are met.
- In order to determine the 'effective practices', a focus group of district teachers and administrators from each district should create a common group of research based 'effective practices' that can be utilized and shared with general educators. This list of 'effective practices' would not be exclusive, but rather would help to develop a common vocabulary/strategies in which educators, general and special education, would become proficient.
- More general education teachers in signs of concerns and SSTs.
- As other states have GT and Dys. under SPED, if that was done here it would eliminate the stigma of SPED.
- What are some innovative ways to get parents to training and information sessions. We try ideas and it is limited.
- Define these visits...be explicitly transparent
- Know the criteria upfront for the visits and expectations
- Say what you mean, and mean what you say
- Certification Requirements
 - Change the certification requirements so that teachers qualified to serve the dyslexic students can also serve special education students.
- Review each districts SPED Operating Guidelines and Procedures for the process to determine if in fact the district failed regarding ChildFind
- Consider creating a bank of effective practices that have proven to improve student outcomes
- Evaluation
 - Since the students are tested for dyslexia, could the criteria for the tests meet the special education criteria as well so additional evaluation does not have to be completed by a different team?
- "Supporting the most effective practices" is going to require TEA to invest in training opportunities statewide for general education teachers, special education teachers and campus administrators.
- Required PD for General Education teachers like GT PD.
- Campus administrators need more direction in how to handle requests for assessment. Often times the campus administrator has told the parent there was no need for assessment or that the child's behavioral issues were not a reason for referral.

- Training for Visits
 - Can district personnel be trained and participate in other district visits in order to be better prepared with the expectations? This would be similar to the DEC visit training.
- Bring other highly qualified individuals who understand dyslexia, special education, and Section 504 to the table.
- Bring other highly qualified individuals who understand dyslexia, special education, and Section 504 to the table. This is a must!
- As a part of the audit process look at the quality of the dyslexia services that are provided and determine what the outcome for change would be for the learner
- when looking at student "receiving special education services", consider adding the number of student's identified by dyslexia to get a true picture of the number of students receiving services or add dyslexia to special ed as outlined in IDEA
- include references with "effective practices"
- Dyslexia students need to continue to be serviced in the general education setting under Section 504.

Anything Else?

- What about the qualifications for the third party people that will be working with stakeholders
- What resources will TEA provide to help the LEA once the findings are found?
- Ditto to qualifications statement above
- What will audit reporting expectations be of the audit? Will it be a public meeting?
- How are districts going to be identified for visits from the Review and Support Teams? Using a single metric like PBMA indicator #10 does not provide a reasonable picture of a districts ability to identify and serve students with disabilities.
- what does adjusting peims data collection mean
- What does significant stakeholders mean? What will make that "significant" amount??
- Will this be clarified and clearly defined so everyone knows the expectations?
- What would the adjusted PEIMS component be?
- SDI
- SOMEONE (THE STATE) NEEDS TO DEFINE SPECIALLY DESIGNED INSTRUCTION.
- From reading the comments on this page, it is evident that we are not well versed in the handbook. Many of the responses are addressed in the dyslexia handbook.
- General education are required to receive professional development in dyslexia, dyslexia teachers can teach students who are special education because it is the LRE.
- What are the roles and responsibilities for the 16 Program Specialists? What will their work look like?
- Child Find
 - Allow districts to submit data showing that they are proficient in their child find practices instead of support visits.
- Focus Team
 - Focus team should primarily focused on support to most effective practices that lead to improved outcomes for students. The part about the visits being "narrowly focused on legal should be taken out b/c that feels like a "gotcha".
- dyslexia
 - Move dyslexia under special education and fund it appropriately.
- Release the written report to the district PRIOR to releasing it to the public. Give districts 30 days to respond to the report before release.
- Hire people with a working knowledge of education in Texas to be on the monitoring teams.
- Reports need to go to school districts (with time to respond) before they are published
- Support teams should work in conjunction with the district to do what is in the best interest of ALL students.
- Window for visits

- There needs to be statewide participation in developing the monitoring templates with representation from all regions.
- PMAS Data
 - A template would be nice to use even if it is from Skyward.
- Transparency
 - The district should be able to see and review / answer concerns prior to public reporting of the monitoring report.
- How will districts fund this?
- Targeted Visits
 - On-site visits should be conducted on the basis of a district that has demonstrated noncompliance and has been identified as a district with documented evidence of child find requirements. This in lieu of visiting all districts.
- Create a state plan that provides training and consistency for identified effective practices. Provide us with a tool that allows us to report results back to the state.
- General education, district leadership, and principals need to be brought into the process because they are the providers of FAPE.
- Scheduling Site Visits
 - site visits should be scheduled at a time when planning is occurring for following years, rather than in the middle of the school year when momentum in a particular direction has been established.
- Monitoring reports
 - these reports should be shared with districts prior to being made public.
- Data Monitoring system
 - Develop a computer plan so that TEA can look directly at the data rather to use LEA time
- Effectiveness
 - Does additional monitoring truly impact Child Find and the provision of FAPE? It seems that additional training, funding, and parent/teacher surveys might provide valuable feedback. Providing districts with adequate funding to support ALL students could perhaps better impact prevention and intervention.
- How about adding an element that reports the time students received intervention prior to qualifying for RtI?
- Site Visit Membership
 - C&I staff and Principals should be included in site visits to focus on instructional practices and focus areas that support all learners.
- Consistency of paperwork
 - Paperwork and programs should be the same across the state. Like other states.
- PEIMS adjustment
 - PEIMS to more accurately reflect what is going on, currently a student in a general ed classroom with 15 minutes of support is coded the same as a child who may require 2 hours of support , both are coded 40. With the push to be inclusive and exposed to general education rigor a better way of capturing services along with location is needed.
- Consider LEA to LEA Peer Reviews. Lowers district defensiveness, increases collaborative practices among districts. Partner similar size/similar demographic districts.
- Dyslexia
 - Consider dyslexia under special education.
- PEIMS
 - PEIMS data collection is adequate, do not increase.
- Visits
 - Could these visits focus on school districts with smaller percentages of students in special education rather than all districts?

- An actual visit seems like a waste of resources if a district was above 8.5%. Using data to measure various areas of compliance has been appropriate. TEA should continue to monitor and measure districts electronically, unless a district is at or below 8.5
- Student Outcomes
- Excited to see student outcomes highlighted here. Would love to see the focus of the visits really be on improving academic outcomes for students rather than solely compliance
- provide a template to LEAs in order to begin working on it now.
 - What are you going to look at? What are you going to question?
 - If it is an SSA do you want to talk to the director, the campus administration, both?
 - Is it going to be all geared toward sped (who was tested/not tested) or will you be looking at the whole RtI process of who should have been tested? Will we be required to test those students in RtI?
- Is once every six years going to be enough?
- Monitoring
 - Consider allowing districts to develop self-assessment/self- audit. Allow districts to develop their own corrective action plan to address identification and service provision for their students.
- Report Release
 - Release the reports to LEAs prior to public release.
- Report Release!
 - Ditto above!
 - School districts MUST see the reports before releasing and must be given a chance to fix whatever is necessary before public release.
- If TEA will trust districts to do a self audit, most districts will do that with fidelity. A desk audit then would be appropriate.
- Increase funding
 - We will need more manpower to implement the new requirements. We need more local control, nobody knows our students like we do. We are professionals and want to help our students succeed.
- We need additional time between the LEA training's and the time frame in which it has to be implemented for the audits.
- When recommendations are made on monitoring visits there has been no funding to make those recommendations happen. For example, on a recent visit, it was suggested to hire two more staff members to provide inclusion services appropriately, but there is no money to hire two more staff members.
- Take the money for the third party facilitator and give us money to increase OUR staff to serve students.
- Increase the standards for General Education TEACHERS getting their degree.
- Regarding the 18-26 year old population~~ regarding assessment, we need very clear guidelines from the State ~~ how to assess 18-26 years old? How to provide when RtI is not an option.
 - Regarding the 18-26 year old population, what about legal age of 18? If parent doesn't have guardianship, how will services be provided if the individual doesn't want to participate?
- Increase funding for districts
- Streamline data and testing between LEA's.
- Provide adequate support to LEA's so they have the manpower to do what is right and meet the corrective action plan.
- set specific parameters
- Simplified methods of evaluation.
- Create a state-based, web-based IEP tracking system so that we have streamlined and similar products to track our students.
- Increased funding for all populations

- Have check points along the way- at specific grades to make sure no students have been missed or fallen through the crack.
- Focus of Monitoring Visits
 - Start with and prioritize those ISDs who are below 8.5%
- Threshold
 - Set a threshold to identify under identifying district and monitor them (not all).
- Provide information on specific areas to be monitored
- Visits
 - Provide a window of possible visits to honor campus events or possible staff off campus.
- Focus
 - The focus should be more on student outcomes, not solely monitoring. You can monitor bad results. The support needs to be what will impact scholars; professional development, local support.
- We hope this will be more supportive guidance, not monitoring (punitive in nature).
- Reporting
 - Reporting is backward; instead of publishing and allowing districts 30 days to respond, districts should be given reports first (like TAPR).
- Need to know what will be monitoring prior to visit.
- Two guidance visits prior to a monitoring visit to ensure we have received guidance and coaching prior
- Is there a way to share guidance as visit/desk audits occur, so everyone is learning and growing, not just input every six years. This could also drive the type of support we need from staff development/growth from TEA.
- Monitoring Visits
 - Instead of onsite monitoring every three years, why not alternating between a desktop audit and then an onsite monitoring visit every six years. Especially on schools who have traditionally over identified and have done what is best for children.
- Give guidance about timeline of visit, feedback, adjustment. Delayed feedback is not beneficial.
- Desk audit
- Could create a calendar of submissions -- ex Sept. - 2 student files, Oct. - referrals in process, Nov. -- child find activities -- etc -- allows districts to know and prepare throughout the year
- No one is concerned with the actual monitoring of programs but guidance will have to be provided so that districts will be able to have everything they need in place.
- Prior DEC visits were not informative. Support in the form of training will need to be offered and a process will need to be spelled out concerning what is expected.
- Do not go back to the DEC process but include a peer review process to look at the entire system instead of checking boxes
 - Make the monitoring process collaborative with peers
- Instructional arrangement funding should reflect increased need.
- Do not use a third party - extra funds should be spent internally rather than with a remote party with no vested interest.
- State needs to provide more funding for personnel for additional evaluations and services.
- Bullet #2
 - We strongly support the manner in which the review and support team will focus on most effective practices that lead to improved outcomes for students versus processes and legal requirements.
- Process
 - It is hard to accept that TEA will be a broad overview when we don't know what the new rules will be.
- When will they be rolled out?

- We need a flow chart of what we are suppose to do in the process - This is broad enough to allow individualization by district but enough structure to keep us on the right path
- Parent Requests
 - We need something in writing that gives us a framework of when we should and should not test when a parent requests it. - i.e. lack of educational opportunities (home school, absences, mobility)
- Feedback
- Can we have a planning year before it's implemented?
- What is the involvement of the Third-party facilitator?
- Can support visits happen more than once every 6 years?
- We feel like this is making more work for employees at the campus level to prove we are doing our jobs. We are already short staffed and evaluating and serving more students on top of keeping up with more paperwork seems impossible.
- Public Relations
 - TEA needs to have a state wide media releases to educate public that we have not systemically denied opportunities. WE are taking hits daily and this is another media black eye to public ed
- Basically, looks like we will be audited more often with additional staff? What penalties will be imposed? The CAP is already a penalty.
- perhaps region service centers can assist with audits to prioritize districts in needs
- The LEA has access to the monitoring report prior to the public.
- ISD's should open services to all rural and charter schools to better serve all students
- Corrective Actions should only apply to LEAs with numbers reflecting under-representation.
- Have you considered expanding Regional service staff to support their areas instead of at the State Level?
- Child Find- Social Media and partner up with physician offices to promote services.
 - Review and Support Services- Allocate more resources for staff members to visit sooner. Provide a template/audit sheet to District for preparation purposes. Creation of a District auditing team prior to review and support team visit.
- Any data collection tools should be user friendly and for the purpose of assisting districts instead of punitive actions.
- Requirements
 - Hire individuals highly knowledgeable in the areas of evaluation and identification.
- Districts should be given audit forms that will used for visits so we can do our own in house audits.
- increase visits every 2-3 years
 - Save money on the call center and place funds for more manpower to visit campuses. More support hands-on the better the program.
- Provide District audit findings prior to publish report
- Districts should be given documents the review team will have so we can do our in house audit yearly.
- Consistency with transfer of IEP and FIE within districts
- Intervention can be, and often is, a fluid form of support...refrain from emphasizing the misconception that because a student may need the support of an intervention, they must have a disability.
- Adopt a best practice RTI/MTSS state framework, and support districts in making this transition.
- Third party facilitators could be Region service center to help support the district.
- The additional 26 staff could be placed at the service center. Allow the district to review the report before the report is published.
- The review and support team members should have and understanding of the unique characteristics of large, small, urban, and rural districts
- SPED Monitoring
 - We like the move of SPED monitoring to Special Populations.
- Transition team as a support to the district to have a transitional timeline to first find the most at risk students.

- Review & Support Team
 - We strongly support all districts getting a monitoring visit. As a Title I school district with all of the inherent challenges, we get frequent visits while more resourced districts never get visited. These frequent visits for us have resulted in our district being better informed about the direction and interpretations of TEA and we find that other districts who aren't visited do not share the same vision.
- create a true RtI percentage, not the over 50% of elementary students in need of some type of reading intervention
- School visits
- How will it be determined which school districts get unannounced or scheduled visits? Recommend unannounced visits for those districts that fail to complete a CAP in a timely fashion.
- Director
 - This seems to be the corrective action plan for districts, not for the TEA.
- How does this help students?
- Upgrade PEIMS system.
- Increase size of the review and support team in special education at district level. Allocate funds at district level.
- Public Reporting
 - Will the full report be published? Will it include how school district's rate compared to other districts. It is unlikely that any school district would meet every requirement.
- Less punitive action, and more availability of expertise in identification and differentiation between students who need and will benefit from remediation versus those with a disability - that is a life long impact.
- Child Find
 - Each decision determining the need for evaluation should take into consideration the unique needs of each student - NOT a percentage, NOT a blanket determination about students being evaluated based on a broad criteria (such as all students in 504 or dyslexia services more than 6 months). Each student is an individual and decisions should be made based on their needs.
- Idea
 - Focus on individual student needs rather than monitoring compliance.
- PUBLIC REPORTING
 - Monitoring reports should be provided to the LEAs for response and review prior to publishing so that LEAs can develop an improvement plan that is published along with the monitoring report.
- Will the State be increasing LEA funding so that the district can create the proposed review and support team to 25 plus an administrative assistant.
- What will be in the portfolios ...how many years back with the data be?
- In regards to "part of the design will include an internal auditing mechanism to ensure processes are done with fidelity" what will that look like, how often should the LEA do this, who will do it, how much manpower will this cause.
- If this is not supposed to be a punitive process...why are you calling it the escalation team?
- The monitoring of the program is a great concern because if this is to see how districts are doing...the state has already identified it as a failure....a monitoring visit will show the same thing. Give us a year to implement the plan and then come and monitor.
- When the reviewer comes to audit our areas....we would like TEA to consider the reviewer to be familiar with our region problems, strengths, needs, and geographic concerns. A person needs to understand our area.
- Do not publish reports prior to LEA review and opportunity to respond.
- Developing an appropriate timeline for monitoring to give districts the opportunity to address the corrective actions.

- Districts that have been staged or remained over the percentage cap should not be audited.
- Reports should not be made public until districts had ample opportunity to respond.
- Sped Director
- Clarify the data you will be reviewing prior to setting up visits so that LEAs may implement their interventions as needed.
- RTI
 - Need specific RTI components and documentation
- Funding & Guidelines
 - Establish guidelines and give the funds to districts
- Provide LEA's with funding and time to implement a plan that meets local district needs working with TEA.
- Ensure that those in support are from TEXAS and have knowledge of urban and rural school district issues
- TEA should focus efforts on LEAs who have deliberately denied services because of the 8.5 cap.
- Provide a different monitoring format for districts who have continued to identify and serve students regardless of cap.
- Even within a SSA each LEA is responsible for their own policies and procedures and may have separate needs.
- Target districts who are at or below the 8.5% should be the first for monitoring.
- Limitations were imposed on special education's enrollment of students
- Assistant Superintendent
 - Clearly communicate data that will be reviewed within the desk audits and on-site visits so schools can "self-audit" and begin any identified corrective actions early.
- Look closely at the LEAs that are hovering at the 8.5% and prioritize.
- Set a STATE plan for the parameters that must be met to qualify for Special Education, 504, and Dyslexia. Make it Specific.
- Training for educators on how to approach parents regarding student difficulties.
- Reviewers
 - What is the timeline for hiring the Review Teams? Will they be based in Austin or throughout the state?
- Visits and Audits
 - Increased monitoring visits and audits will only have a positive impact if they focus on technical support and guidance vs. identifying problem areas; we know the problem areas, we need specific guidance as to how we can significantly improve in those identified areas.
- Nothing else
- Visits and Audits
 - All past experience with onsite visits, no matter if SpEd was the reason....always ends up in finding something wrong and a CAP necessary. Never fails...and never fair!
- In consideration of the amount of monitoring that will have to be completed, TEA should provide a local TEA representative.
- Staffing
 - If TEA recognizes that "it doesn't have the same staff or structures in place...related to monitoring" how can the assumption be made that local districts do either? Requiring additional testing without appropriate (when necessary) RTI process, all assessment staff will find themselves ONLY testing and not available to support campus IEP meetings, parent/teacher concerns, etc. Never ending testing! How might this additional testing effect our SPPs monitoring and that entire process?!?
- Review Team Qualifications
 - I think it is important that the persons hired by the TEA to address these findings are PROFICIENT in the understanding of the intent of RTI. I see the problem is that people who make the decisions at campus or district levels do not truly understand the importance of securing

Tier 1 and therefore RTI is seen as a "special ed thing." If the members of this team are hired and follow the same philosophy that RTI is something you do prior to referral then we have completely lost the game here. We need people who know curriculum. Who know INSTRUCTION. Who know school-wide positive behavioral supports. Who have proven track records of achievement (and not padding numbers or hiding kids to make data look better...). We need people who 100% understand RTI and also do not place blame on the parents. I think TEA sometimes hires people who they are connected to politically or people who look good on paper but have done nothing to improve student achievement.

- Child find
 - How can LEA improve child find?
 - Why do districts that were hit on PBMAS for over identifying students with disabilities going to be required to follow
- corrective action 1? This was already being done...
- EDGAR
 - Why do districts have to comply with EDGAR for usage of federal funds and state contracts can be signed without competitive bidding?
- Agree with comment on being hit on pbmas having to follow CAP 1.
- Stakeholders
 - Who are considered significant stakeholders?
- 3rd party facilitator
 - This sounds like more money spent. Will the 3rd party facilitator have any special education background? Or vetting process
- Stakeholders? should be parents
 - Parents attend ARD meetings for their children and meet with campus teachers and principals. They look for progress and trust the campus to do what is best for their child as we are the professionals. General ed teachers need to be invested in the change that is needed.
- Language of the CAP draft seems to lay responsibility of the 8.5 "misunderstanding" on LEAs -
- The statement that the 98 new indicators will not result in punitive action seems disingenuous when districts can still lose funding due to disproportionality.
- Who is the peer-review team?
 - How do we measure the benefit of the site visits? How are site visits related to student benefit?
- USDE corrective action was focused on districts that had child find and FAPE concerns not all districts across the state.
 - How will the PEIMS reporting impact what districts are currently doing?
- We need just as much emphasis put on today moving forward as is put on looking backward. Training for NOW and doing it right moving fwd
- Concern for the funding of .5 M for technical assistance and vendor.
- Have we looked at the root cause for the 8.5%, this is what the CAP needs to address
- How do we pay for this given that with 98 indicators every district would trigger something? Any of these indicators would be a loss given 15% would have to be reallocated.
- MOE calculations would be affected by having to reallocate the 15%.
- This is asking the impossible...
- Consider training and placing current Directors on Review and Support Teams. We could volunteer 1-2 weeks a year to assist as part of team.
- What will the team of reviewers be reviewing? Confidentiality issues? Students shouldn't be involved in the review process of files.
- assessment process? Language of Document
- Districts need clarity of just where dyslexia falls? IDEA or 504.. Clear guidelines..
- Child find - outreach?? Are they not one and the same? Why re- invent the wheel?
- TEA Staff

- TEA says they are going to increase their staff by certain %, what are they going to give the districts to increase their staffing by "X" percent based on need?
- Apology
 - An open acknowledgement should be made that TEA is sorry for this mess, but that we all need to move forward together for the benefit of students. Saying "I'm sorry" will go a LONG way!
- Monitoring Reports
 - The report should be released to the district to allow them a chance to review prior to being made public.
- Have TEA be proactive instead of reactive. This is a problem from 14 years ago.
- RtI
 - We need clarification on RtI and what our responsibility is surrounding this. What do we do with slow learners that will always need this support, but may not qualify for SPED? Refer them anyway? This seems like a waste of resources.
- Is the USDE really supporting us or is this a big push for vouchers?
- Lack of TEA monitoring did not lead to our current dilemma.
- Define what is "specially designed" instruction. Define what is RtI and when referrals for evaluation are appropriate.
- There needs to be a way to measure the accountability and outcomes and the additional 26 positions at an annual cost of \$2.2. million. Can districts provide feedback on the effectiveness of this plan.
- How does the site visit plan address the concerns that really involve general education supports being provided prior to referral for special education services?
- Monitoring
 - TEA's monitoring of SPED participation rates caused this problem. Monitoring and regulations included in Action 1 are unlikely to fix the issues in our school systems that lead to over or under identification in Special Education.
- New Indicators
 - The establishment of new indicators for each disability and race will only perpetuate the problem of denying services to student but will now be based on race. That seems even more discriminatory.
- Proportionality
- Concern that the new disproportionality indicators will be looked at in the same manner as the 8.5 indicator
- We fundamentally agree with the proposed structure. The barriers that we see is in the development of program guidelines for RtI, dyslexia and behavior programs across the state. Also the PEIMS component to track the implementation of services through these programs needs to be developed and rolled out to LEAs. Clear state guidance and expectations needs to be provided to LEAs including forms or systems to ensure implementation.
- Compensatory services is the biggest concern we have in this proposed action. The concerns include how you determine what/how/how much would meet the expectations by the state and what the funding source these services would access. Would a "set aside" part of federal funds need to be established? Will there be guidance on this?
- As far as the campaign to provide information to the parents, how will RtI, dyslexia, and Sp. Ed work together to avoid duplication. The state will need to set very specific guidelines on how to distribute and standard information to disseminate.
- 3rd party will create more distance between the LEA and the district and cause a breakdown in relationships instead of improving outcomes for students.
- The call center should provide feedback to the district regarding the concerns that are being stated.
- The third party face-to-face will give parents a place to provide input that circumvents the LEA and keeps the LEA from meeting the needs of the students because we don't know that there are concerns
- Parent Information

- Will the third party provide information in a way that parents can understand and doesn't create a false sense of a need for evaluation where one does not exist.
- This process assumes that LEAs are unwilling to do the right thing for students.
 - Because some districts changed policy to meet the accountability requirement of 8.5%, it is assumed that all districts failed to identify students requiring special education and related services.
- Is this just another Gotcha?
 - Districts jump through hoops every day to serve their students and create environments and structures for students to reach success, and yet we have to stop the presses and prove that we are doing the right thing.
- Assessment
 - TEA should put together a roving group of assessment professionals to go to districts and perform the assessments. Assessment personnel aren't readily available to hire in rural areas of Texas.
- Peims being streamlined across the state will help with students who transfer, and accountability between districts
- Expertise
 - The people conducting these monitoring visits need to have a background or extensive training in the area that they are monitoring.
- Monitors
 - Monitors MUST be well and consistently trained. We CANNOT have more RF monitoring situations where depending on your monitor, you get different monitoring citations for the same practices.
- will need more funding to hire testing personnel to meet influx of referrals
 - relief from possible due process filings based on child find
- more funding
- funding needed for special education teaching staff
- parameters
 - CLEAR parameters on specific items to be monitored and provided in advance of monitoring visit. NO SURPRISE visits
- If the plan is support/coaching/guidance, every report should be written from this perspective.
- SSA
 - consideration given to SSAs when scheduling monitoring visits. SSAs could be monitored every single year from now on because of number of districts in SSA.
- Funding
 - For small schools, this is adding more duties to an already minimized staff.
- Followed TEA guidelines
 - We followed TEA guidelines and we are the ones "cleaning up the mess" with monitoring only and at this point specific support monetarily or personally is not evident.
- Teamwork
 - When we reach out to TEA for guidance on an issue it almost equates to "turning ourselves in" for something. We need clarification and guidance, not sanctions.
- 12 school districts out of 1200 school districts is not an accurate account of what happens in all districts.
 - We take care of all students and now feel like we are being punished for those who are not.
- Support Team
 - Emphasis should be on support as opposed to review. This reminds me of the commercial where the dentist identifies a cavity and washes his hands and walks away. Instead we need a "dentist" to identify the cavity, recommend a course of treatment and follow through with that treatment so that a healthy mouth or system can be in place.
- We need specific guidelines during monitoring for what will fill in the gaps of the monitors

- If TEA is going to significantly increase their staff then we respectfully request that Texas Based Special Educators
 - be hired as they should have specific knowledge to our state.
- It is appalling that 38 staff members have been added when this money could have been used towards additional funding for schools and programs for kids. Where is our additional staff?
- It is frustrating and not fair that TEA cannot answer our questions or give us guidance at this time.
- Why is TEA contracting with a 3rd party company being utilized for feedback when 38 staff have been hired?
- Who is going to determine if an evaluation really is needed and a school is in default for an evaluation? If a child is in RTI for 6 months, and then tested and qualifies; does a school have to provide compensatory services?
- Mental Anguish
 - Don't re-write the rules in the middle of the game. When you release the new rules- have a phase in period. Then saturate us with training during the phase in period. Then pull the trigger and say, "It is time to shift".
- Child Find
 - Who is going to monitor child find? It seems like this CAP is trying to rectify the lack of Child Find - but you don't know what you don't know.
- If you follow the guidelines you find who comes forward - if they don't come forward, why should the LEA be in trouble?
- How will this affect accountability? Especially in view of STAAR testing results? LRE? If we put more kiddos in, we need to serve them, may increase inclusion services (to improve access to gen ed curriculum he will be tested on)...will more staff be provided?
- Parent involvement
 - Maybe yearly parent input can be solicited
- Expand on the statement "ensure monitoring focuses on improvement for students as opposed to exercises in rote compliance."
- How do you envision the unrestricted access to schools and staff?
- More information regarding the proposed PEIMS data collection needed.
- How is this going to be structured will all Regions be doing the same thing? Will we all follow a same template?
- Provide more guidance to Districts on finalized CAP
- Parent participation is always a concern, will TEA start a media campaign to promote the Corrective Action Plan .
- Where are the guidelines to help us with positive change? funding?
- Review of the TEKS and PreK guidelines for reduction of TEKS that are not developmentally appropriate.
- TEA must be clear regarding the improvement on guidelines locating and identifying students. Funding is an issue.
- Parents are not always aware of all the things happening for their students. Even when given opportunities to come to meetings, give their input, and help in developing the plan, mop mentality often comes into play and no matter what you are doing, they are not satisfied.
- Funding
 - Funding continues to be an issue in Texas - the state does not provide enough funding to meet the needs of students, much less the Child Find duty. The cost of protocols and staff has risen sharply in the last 5 years but funding has not. Districts must use other funds not marked for special education to fill in the gap.
- Who is the 3rd party facilitator and what is their background? Are they from Texas?
- What will the PEIMS data collection be? What will it look like?
- What will the consequences be for districts as a result of monitor findings?

- Evaluators need to have consistent audit training so that all audits are
- Looks like we are putting money into TEA getting a new department.
- More information needed on that the PEIS data collection components will be and if they will relate to accountability
- Sped Director
- All of TEA interventions are within the Department of Special Education. What about the 505, Dyslexia groups?
- Clarify timeline for referral process. SPED Director
- The general impression from the plan is that districts are being punished for what they were told to do. Even After they may have been punished for not holding to the sped census Requirement initially.
- This "finding" of schools writing sped qualifications is completely contradictory to the 1% cap on STAAR-ALT

Corrective Action 2 Responses

Barriers or Concerns

- Needs to be clarification on how schools must connect with parents of 504 and Dyslexia through an accountability process to ensure parents understand their rights to the referral process. IDEA Part B funds must be mandated for allocation to the RTI and 504 program. Clarification on the timelines on the referral process and clearer timelines on acquiring consent for evaluation which is currently used as a way to delay testing for eligibility. REEDS should not be an option who have been in the program for three years. Re- evaluations should be conducted. There must be a clearly defined timeline for students who are in need of additional services and checks and balances for accountability. Compensatory time offered to parents needs to be monitored to ensure timely services are available.
- Previous supports & services
 - what consideration will be given to those cases where students were making progress throughout the process and didn't warrant an evaluation
- There must be very clearly defined procedures in regards to who will be contacted... simply stating that every student in RTI 6+ months and in 504 or in dyslexia related program is very wide reaching. Districts do not have the staff to assess the potential number of students this would "open the door" to. With the current Federal timelines of 45 school days for completion of initial referrals and this being tied to our PBMAS... realistically Districts would not be able to meet these timelines. Districts simply do not have the assessment staff that would be required to meet these timelines with the potential influx of referrals.
- Identifying, Locate, and Evaluate
 - There is a concern regarding requiring districts to connect with parents of students who have been in RTI and section 504 for 6 plus months and providing them with information about the cap and their ability to ask for a special education evaluation. We feel this unnecessary and a duplication of what is already being done. We are already required to include in each student handbook the Student Handbook Statement, which is a TEA developed letter which already informs parents of their right to ask for a special education evaluation.
- Compensatory Services
 - Why can't the funds spoken about for compensatory services be first and foremost be allocated for a CLEAR guidance and direction from OSEP and TEA on what a sufficient RTI program/process can be? No guidance at all and we all know "it depends" but if this is the basis of criticism and determination of compensatory services owed, then what basis do we make in determining if it was appropriate or not and therefore award the compensatory services detailed??? give us guidance!
- Program Differentiation
 - There is no problem with understanding the different program differences, why is there an assumption that districts and parents do NOT understand and failed to appropriately determine services
- Can notifications be staggered by priority to help stagger evaluations so all aren't within the 45 day timeline?
- What support will be provided to help with the shortage of assessment staff to complete evaluations in a timely manner? A list of qualified vendors with pre-negotiated price lists for services that districts can use would be helpful.
- Establish a timeline or statute of limitations for compensatory services.
- Reconsider timeline -- we must notify parents by March 1, but district training and support won't be available until August. This could also create a problem with the 45 day timeline if evaluations start being requested.
- Child Find

- For the outreach campaign, it appears that TEA will "tell" the district what to do. LEAs already have required annual activities. What is TEA going to do to support additional child find activities.
- Is the testing for dyslexia going to be a part of the Special Ed process.
- Funding for compensatory series?
- Will there be an Arbitration process before lawsuits begin?
- Why is every student in the district to get Special Ed evaluation if they are 504? Will we have enough diags? Where are the districts to get the funds coming from?
- Please consider rural as opposed to urban, small vs large in the methods used in outreach.
- Action
 - Outreach campaign only being funded for one year? What's the long term plan to ensure we don't repeat mistakes
 - Costs associated with parent trainings? Is it parent funded or school funded?
 - Who is conducting trainings? TEA or schools?
 - How are funded from lawsuits to ensure protection for children who were to get services that didn't?
- Compensatory services
- What a future nightmare!
 - As a small charter, our funding is limited and our budget is tight. We will be the last district to receive funding assistance and I am concerned how we will pay for services that we may need. Our focus has been on intervention for our disadvantaged "slow" children. These are not special Ed students. Will we need to short these children for mistakes that we did not know that we might have made?
- Funds
 - Additional diagnosticians will be needed to test a vast amount of students that fall in this criteria. Districts will need funds to pay for additional diagnosticians.
- Third Party Contractor
 - Will TEA have to follow EDGAR and competitive bidding processes to obtain a 3rd party to create and execute the outreach campaign
- Floodgates
 - So how we will manage the avalanche of inquiries, parent questions, etc that will result from a broad campaign? Who will manage PR side of this at district-level? How will this negatively impact the limited resources we have to serve our students who are currently enrolled and needing special education services? How far back will the LEAs have to search for possible compensatory services? What funding will be given to LEAs for compensatory services. Why is a third party being utilized to handle this outreach process. What will the key indicators be to target specific districts or families?
- Concerns on the call center and if the LEA will get specific names of the person they speak to
- Concerns that the third- party employees would become adversarial advocates
- Why evaluate a student for Special Education if there is not a suspected disability?
- How do LEAs determine what students should have been referred?
- Compensatory Service Delivery
 - If TEA is going to create a fund to support efforts, and the Governor is mandating for TEA to get in line with OSEP, will 100% of compensatory service delivery be paid for from the state that set the 8.5% cap?

- What data will be required to determine if a child was not previously tested...will parents' statement without documentation be considered or must there be a paper trail to support a previous referral or student concern?
- Opportunity for SpEd Evaluation
- The current draft plan is having LEAs send out letters to a very broad reaching...been in RtI for 6+ months. Can the Agency support this in a roll out. For example...Year 1--Tier 3 for 12+ weeks and not making progress to close educational gaps and Section 504 students who are "at risk" for certain indicators.
- Year 2--....
 - Staffing shortages for increased referrals. Upset parents.
 - Unnecessary increases in advocacy groups. Compensatory services with staff shortages. Paperwork consuming instructional time.
 - Disregarding a working efficient RTI system. Disabling a student where a disability doesn't exist
- Director of Special Ed
- What happens if a student is doing well after they are in special Ed and are DNQ at their 3 year reeval are we supposed to leave them in Special Ed?
- If you are staged a 3 or 4, will you still have to do the annual paperwork?
- An onsite visit is not necessary unless desk audit shows continued problems.
- Communication within TEA is ineffective at times, how is throwing a 3rd party facilitator going to improve this? And how is confidentiality going to be confirmed?
- The practice of instruction falls under curriculum and instruction, but the review and support team is reviewing special education. It feels like special education will get the blame for this. curriculum and instruction should be involved in this process as well.
- TEA doesn't have the expertise to monitor and effect changes in SPED. It is too complicated.
- This is not a district problem. TEA created the problem, they should be the ones to correct them.
- TEA needs to listen and provide feedback instead of sending people who are not allowed to discuss or even provide clarification.
- Current lines of communication with TEA are ineffectual. More monitoring and regulations are not going to improve this.
- TEA visits should be yearly, not every six years.
 - support visits once every 6 years
- I feel that visits should be more often than once every 6 years. Desk audits are good, but only those involved in performing the audit are invested in improving outcomes. With more frequent audits, it would assist the district in staying focused on student outcomes and improve follow through on corrective action. It's like districts jump through hoops to improve STAAR scores, so if you place higher stakes on special ed student progress, more effort will be put in by all teachers, administrators and parents involved.
- Who is going to pay for the third party facilitator?
- What kind of background would the support team have? Would they be trained in the current educational practices for struggling learners? Experts in curriculum? Effective practices that lead to improved student outcomes?
- The cost that TEA will incur, hiring and supporting the teams seems excessive compared to direct student impact.
- Special education compliance audits and instructional support visits are two separate skill sets, highly concerned that a single team will be unable to provide both of these services within a District.
- PEIMS involves working with another department outside of special education, as well as data programs which often takes extensive time to make any changes.

- After reading through the entire plan there is very little focus on student outcomes but more so on the process and legal requirements which is not what is indicated in bullet 2.
- What will the process be to identify if FAPE was denied? How will that be determined?
- Concern
 - Financing and staffing at LEAS....special ed staff, PEIMS staff, diagnosticians, etc.
- Funding: finding and funding the needed additional personnel
- Funding - No additional funding to districts but additional funding allocated to TEA for oversight? Is there a way this can be allocated to the provision of services for students directly?
- Too much money will be placed at the top of the chain. Not enough support for the children at the bottom of the chain.
- Plan does not address the concern of the parents. These "support" visits are really compliance visits.
- Regular visits take an enormous number of staff time which in turn takes away support services for the students.
- Is a third-party facilitator going to justify their need in order to keep a contract going? Why is a third-party needed?
- SPEDX didn't go well. This seems like another party creating issues that could be an issue with data privacy.
- TEA site visit - Time and resource intensive for LEA and takes time away from serving kids
- The timeline for data reporting is a concern.
- Unrestricted access is not realistic.
- Will districts be required to find any student that has been in the system since PBMAS?
- Will TEA notify districts and parents regarding the information they are accessing?
- Report published before LEA can address potential inaccuracies. Need to flip. LEA responds first then publish.
- Confidentiality- how will this information remain confidential under FERPA?
- What will be required from the LEA during site visits?
- Are our ideas and concerns really being heard and taken into consideration?
- Continuity among visits with compliance
- Will TEA be visiting classrooms and if so concerning due to nature of students and importance of instruction
- I am concerned that all of the unfunded mandates contained in the corrective actions combined with the increased bureaucracy will reduce capacity to render services.
- Concern with the word "all" in the corrective action 1 from IDEA wording. Not all students will need testing eg. food allergies.
- Visits should not be disruptive to instruction
- Staff is not adequate to fulfill this obligation.
- How will these monitoring visits improve student outcomes? During DEC visits years ago, there was a focus on compliance and we did not see an improvement of student outcomes from the TEA monitoring process. How will these on site- visits be different?
- It makes sense but the monitoring activities don't support the desired outcomes
- Financial burden to hire enough staff to test all of the students required and we can't find enough staff under current conditions - we have positions unfilled as it is.
- Districts should be provided the opportunity to review monitoring reports and respond to inaccuracies before reports are made public.
- Upfront training will have to be thorough in order to make the best use of the on-site visit time.
- Will the visits be punitive or support?
- Where will TEA find qualified people to "monitor" their LEAs?
- What is the definition of effective practices that lead to outcomes?

- Many good things have been found in the RTI and 504 process and meets student needs. This plan seems to indicate there has been no effort by districts and we are being punished with more oversight. How do we balance and make sure we are being required to test hundreds of students who do not show a suspected disability or ultimately do not qualify?
- IDEA-B finds can not be used for administrative purposes. How are we justifying this?
- If we have this money, would it not be better served to train ALL teachers in good reading instruction and strategies for struggling learners which can help ALL students and reduce the need for pull out (there is no time to teach them effectively and have so many pull out programs)?
- Can consideration be given to providing personnel to districts to support compliance?
- I know the commissioner said class size is not a priority indicator but what we see is it does matter, smaller class sizes with focus on all teacher knowing how to and providing quality instruction would be hugely impactful. Yet we are running teachers from the profession with inadequate pay and benefits for the time they have to put in to be successful.
- What technical training will those monitoring be provided as TEA was the one who initially imposed the indicator?
- Districts should have the ability to respond before the report is made public
- The purpose of monitoring visits has to shift to improving outcomes for students with disabilities rather than pages of items to check off in folders.
- Concern related to child find for "all" students including those in hospitals, jails, agencies, and other facilities that have their own restrictions and protocols for allowing access to students when the timeline for the students' stay may be shorter than the time it takes to navigate their system and clearance/access. We need support from the agency to help school districts navigate these barriers by imposing restrictions on the agencies if they limit access to the districts that are willing to serve students.
- What is special education actually going to provide for students that are already successful, but parents want the child in special education.
- Where did RtI 6 months derive. Define "previously suspected"
- Targeting specific districts or families based on key indicators...what are these indicators?
- Why are we using 3rd party vendors for an outreach campaign?
- How will information and feedback be obtained in rural districts whose parents cannot afford to take off work and drive an hour and a half to the ESC?
- Who pays for the partnership parent training and information center?
- Who will be eligible to be a pre-qualified vendor?
- 6 month timeline in RTI is subjective where did come from?
 - If a student is showing progress why should they be tested? This should also be applied to 504 and dyslexia students.
- How far do we have to go back to identify and locate? Does "educational need" still matter
- Compensatory education: Even though this is individualized - there are a lot of factors to consider: if they Did not qualify previously and did not need specially designed instruction and 3 years later failed STAAR and do qualify. How far back do we go?
- Where does 6 month RTI come from?
- Influx of referrals.
 - Limited assessment staff.
- Why are we targeting kids in RtI programs when they are being successful?
- Why are we targeting students "with only a 504 plan" when that plan has been successful?
- Cost of assessment
- Staff to complete assessments
- Framework for compensatory services - type of student, timeline, criteria
- No guidelines for RtI yet we are being held responsible for issues

- If schools are going to be responsible for compensatory services especially for students who were in RtI for 6 months, will there be any funds to support the amount of testing that will occur?
 - We are already short diags.
- Outreach Campaign Outreach Campaign
- Using a 3rd party vendor for this seems wasteful. Since this contractor is only creating a "template", is there a region center, or even TEA, that could do this more cost effectively?
- How far do we go back to seek and find missed students for both considering compensatory services and parent notification? 2005?
- Compensatory services? What is the timeline? How far back does district have to go?
- Outreach Campaign
 - We are already notifying parents regarding child-find. We publish brochures, newspaper ads, internet website notices, posters around town. What will be different?
- Public perception of the LEA/Lack of confidence in LEA by parents/families
- RTI
 - Please provide data as to where the "6+ months" from. Additionally, what if a student is making progress in the RTI program? Why would we automatically want to remove them from general education? Texas Administrative Code states that prior to a referral, students should be considered for all general education interventions and should be referred only when these are not showing progress (19 TAC 89.1011(a). Additionally - how can TEA monitor and critique RTI programs when the design of these programs has been a local decision. Until we have guidelines for the "rules of the game", we can't play along.
- The need for additional funding to support CAP at the local level: Diagnosticians, Counselors, etc.
- Criteria for 504 and Sped are very different
 - IDEA has specific qualifying criteria. If a student is successful with the protections under section 504, why would we be forced to evaluate/assess for special education services?
- RTI
 - RTI teams are already required to notify and inform parents of their child's progress while in RTI. Parents are already aware of what we are doing through RTI.
- 504 vs IDEA
 - Every student who is served through 504 is NOT served with a disability that would qualify them under IDEA. Why would we automatically refer them for a special education evaluation?
- How extensive will the parent contact be? Concern with "TEA's individualized parent support with ISD staff".
- Will state fund RTI , 504 and dyslexia?
- Parent Request for Evaluation
 - It doesn't make sense to reach out to parents of students who are protected under section 504 or receiving dyslexia only services and are doing well, being successful and suggest a sped evaluation.
- \$3 million dollars seems like a lot for an outreach campaign that districts could do basically free.
- Funding local districts - why not give a percentage of the funding that the state receives to the districts in need. This is a major concern.
- Diag Shortage
 - This will take a great deal of assessment personnel which are already hard to find.
- Compensatory Services
 - This needs to be much more defined. How far back will this go? What type of compensatory services will the state assist with? What will that look like?

- The language in the document even lends itself to seem that state support will only be available through the "pre-qualified list of vendors". Similar to the way some of the STAAR remediation was offered.
- Compensatory assistance should be given directly to districts to be able to hire teachers who know the students and can give direct services.
- Parent Requests
 - Parents already say, "I just want to know his IQ," or "I just want to know where he/she is cognitively," and "I know he doesn't have a disability but I want him tested..." This is opening the flood gates for unnecessary evaluations.
- RtI Description
 - The districts will need a definition for RtI. Many districts are offering a wide variety of intervention such as STAAR remediation that may not need to be scrutinized for child find or FAPE.
- 504 eligibility
 - IDEA eligibility is clear. Students under section 504 in my district do not meet IDEA eligibility, so why would we unnecessarily evaluate these students for special education?
- T.A.C.
 - Regulations tell us that students should not be referred for sped evaluation unless other interventions have been implemented and not effective. Special education is the last resort. It seems we are making it a first resort... scary for our students.
- Will there be an age or statute of limitation on the services.
- How will that affect Charter School since they do not seek out Children?
- How will they determine if putting these students in special education would have been better than the other interventions that we provided them?
- Call Center
 - Individuals receiving calls should have thorough training. Also, they should refer to the immediate Special Ed Director in the district. There must be consistency in the responses being distributed to the various district. Offer trainings to the parents but not have it on requests because it ties up staff who are already lacking time if they have to continue to repeat trainings.
- Publicity
 - Districts feel they are doing a good job of promoting Child Find.
- Compensatory Services
 - Services should be based on needs assessment, progress of the child, educational need. Funds will need to be available.
 - There must be criteria developed to determine which students in 6+ months of RTI, who have only 504 plans, or in dyslexia programs must be evaluated.
 - A blanket statement is not appropriate for students.
- We do not keep students in RTI that long
- Campaign is so negative when districts only following the mandates of TEA
- This whole plan was designed after 10 days of study by TEA
 - So many questions to be answered
- dyslexia; needs to be put under special education
- Who is paying for the PD needed
- MONITORING NEEDS TO BE SCHEDULED FOR DISTRICTS
- Do we assess any child at risk
- Will the monitoring be punitive like the surrogate monitoring
- Findings reported to parents Board???

- Students who are slow learners never will qualify even at risk for failure
- What are targeted interventions
- Don't we already provide a call center? SpEdTEX?
 - I provide this number to parents but if they don't get the answer they want, they move on to someone else.
 - What value will this add to the process.
- It is a passionate issue.
- Parents want us to "x" it. We want to "x" it.
- It comes down to resources and time.
- We need a diag or, even better, an LSSP at each campus.
 - That is three times the money we receive.
- Compensatory service delivery:
 - Where is the repository of resources for appropriate compensatory services based on a student's disability?
 - This seems to assume that the student was just as excited or on board with what was needed in order for the student to make adequate progress and that the parents were as supportive.
- Referral
 - Will Rti be restructured to evaluate the process for determining who should be referred?
- Evaluation
 - How often should a student be evaluated?
 - If a student is evaluated one year and does not qualify, do we continue to evaluate if a parent request or teacher makes a referral the following year
- What key indicators will be used to target specific districts or families.
- Is there a "statute of limitations"?
 - How far back do we go for compensatory services?
- Definition of "specialized instruction" needed
- Who is responsible for the compensatory services for students that have changed districts?
 - Districts need to be allowed to implement RtI as appropriate.
 - Every student has a right to be identified as a student without a disability.
 - Evaluating a student before quality interventions have been utilized is unfair to the child.
- Consensus or guidance of definition of LD as currently it may vary from district to district
- Will there be feedback for districts from the call center?
- We can't make informed decisions without all the facts.
- The outreach campaign could create an additional need of staff to comply with testing for the families who decide to pursue additional assessments
- Need to clarify which district will be financially responsible for compensatory services for students that have been in more than 1 district.
- Shortage of Assessment Staff
- IT is already dif_cult to _nd highly quali_ed diagnosticians and/or LSSPs.
 - Is there consideration being given on how to increase the volume of assessment staff to test students
- The term "Should have been referred" should be further clarified.
- 504/RTI students/parents are contacted at least once a year to discuss progress on top of 3/6 week reports that show progress.
- RtI – what tier? Everyone is in Tier 1.
- Shortage of evaluation staff is a concern.
- How will TEA assist districts in recruitment, retention and training options for evaluation personnel?

- Students who are making progress under RtI and Dyslexia should be excluded from requiring assessment.
 - This is consistent with state and federal guidelines and eligibility definitions.
- Student records
- Who decides who should have been evaluated and how far back do you go, these would not be SPED records, so the impact of determination from old complete/incomplete records could be a time/budgetary/personnel major burden on district
- Why would an evaluation be required if a student is in RtI and making significant gains with general ed interventions?
- KEY Indicators
 - What are the key indicators that will be used to target specific districts for the information campaign?
 - Defining SLD will also help this
 - Compensatory services will be funded by the LEA?
 - Using what funding source?
- Some of us are robbing Peter to pay Paul as it is...
- Students changing districts and the barrier of receiving districts not being notified or aware of previous actions
- What are the key indicators determining escalated guidance?
 - These may be the same indicators that should indicate actual visits referenced in Action 1 (instead of blanket 6 year rotation)
 - Outreach Campaign
 - The outreach needs to include a component about the eligibility process for special education including not all children who are evaluated will qualify for special education using the two prong eligibility criteria (having a disability and needing specially designed services as a result of the disability).
 - Information is already provided to all families each year as required by state law in the student handbook (Texas Education Code §26.0081).
- Limited resources.
 - Who's going to pay for this?
 - It is not reasonable to think we can financially support this.
 - Again, the money is being given at the top.
- What key indicators will be used to target specific districts and families?
 - RtI 6+ months
 - This needs to be defined.
 - Which Tier of RtI?
 - 6+ months with progress or only students served 6+ months and not
- How would compensatory services be regulated with student transferring from ISD to ISD
- Who is going to pay for the letter, public service announcements, staff for town hall meetings, and individual parent support?
 - Districts are already understaffed in special education and those funds need to go to direct student support.
- Funding,
- Need of highly qualified Diagnosticians
- RtI
- cont. from above, only students served 6+ months and not making adequate progress.

- And how will adequate progress be determined
- Compensatory Service Delivery
 - Will there be additional guidance on how this determination is to be made since this is a very subjective determination?
 - Will districts have to apply for these funds and will there be specific criteria (like high cost funds)?
- Outreach
- Could this be a duplication of services (Child Find), what does opportunity for special education evaluation mean?
- Only 504 plans
 - What type of 504 plan?
 - A plan with accommodations, a monitor only plan, an accessibility plan?
 - Or all 504 students.
- What about the IDEA criteria that requires both a disability and a need for specially designed instruction.
- Would failure of EOC testing be considered lack of educational progress
- Compensatory funding
- Will the state allocate funds for a possible increase in compensatory services,
 - will there be a cap on time allocated,
 - for example; one year, two years,... how far back do you go and
 - who determines this (statute of limitations)?
- Funding for compensatory services is grossly inadequate.
- Will call center relay feedback complaints to districts?
- If districts are required to connect with parents of all the students in 504,
 - RTI programs to provide an opportunity for sped eval, who is calling,
 - how can any school possibly test all the ones that want to test just in case?
 - Again shortage of qualified personnel and funding to provide these personnel
- Who is responsible for providing compensatory services?
 - How far back are we offering compensatory services.
 - What if a student moves in and was not offered evaluation from previous district.
 - Will relieving district need to provide compensatory services
- Dyslexia
 - If dyslexia is brought back under the IDEA umbrella as a SLD in reading what will be done to help teachers currently certified as reading specialist to become SpEd certified?
- The person that answers the calls in the call center needs to be educated in special education.
 - Better yet, they need to have been an administrator in special education for 10+ years.
- Will districts be expected to evaluate any student requested by a parent or staff member when there is no evidence that the student is struggling functionally, academically, or behaviorally?
- Must parents of students who have been in RtI Tier 1 or 2 for 6+ months and are progressing satisfactorily be notified about an opportunity for their children to be evaluated for special education?
- What about students who are doing well in a dyslexia program and have no other learning difficulties, must those parents be notified about an opportunity to have their children evaluated for special education?
 - Our district has an intensive dyslexia program that meets the needs of most students who have dyslexia characteristics.

- Those who aren't progressing in the dyslexia program are referred for a special education evaluation.
- There are students who are on or able grade level and receive 504 accommodations in order to ensure that they have access to RtI clarification is needed... 6+ months on which tier?
- Identify Students in RtI for 6 months or more...students must be provided an opportunity to be served in LRE (Only 504) prior to being served in special education.
 - What consideration is being given to LRE and response to intervention?
- Educational Need
 - What is the determination for educational need, 504 may allow an increase in accomadations due to SPED limitations for eligibility.
- Define Specially Designed Instruction
 - Federal law does not adequately de_ne "specially designed instruction".
 - Perhaps a Texas de_nition of "specially designed instruct" will clarify who needs special education for all involved; school staff, parents and disability rights advocates
- What are the key indicators?
 - I am concerned that we will be focusing so much funding on evaluation of students that it will take away funding, faculty and time to provide adequate programs for students.
- What will define "for students who are found to have needed services and did not receive them?"
- "Compensatory service delivery for students who are found to have to have needed services and did not receive them"
 - This statement is concerning.
- Who determines this?
 - What specific criteria is this based on?
 - Will parents that "feel" their child was denied services, but who did not actually meet eligibility criteria for special education, but were eligible for 504 or who were provided RTI and made progress be considered one of these students?
- Too broad of statements in this document as a whole.
 - Poorly put together and needs to be refined and give clear direction/expectations.
 - Honestly, I believe that this document was only created to cause more pinger pointing at the people who are actually in the trenches and making a difference instead of supporting them with more funding to support services.
- The real issue is lack of funding and support for educators by politicians and people who are too far removed to even know what is going on day to day in a district.
- Special Education, as a whole in Texas, has done an amazing job in locating, identifying and providing services to all students who are in need.
- I also believe that you will always find issues if you want to find them.
- Who will define compensatory services?
- I like the idea of TEA providing clarity for LD.
 - This is the most confusing disability.
- How are you identifying "key indicators"? How will those be de_ned?
- Lack of staff
- Compensatory Services
- Guidance is needed on how to identify which students get services .
 - Will there be a statute of limitations?
 - I recommend 1 year as is the case for due process hearings
 - What are the key indicatorts used within the outreach campaign?
- Key Indicators:

- please define "key indicators"
- How and where are the parent training and information center located?
- How are you determining that students were not evaluated and should have been?
 - Seriously?
 - You're predetermining that the LEAs have failed our students!
- What about parents who are seeking disability diagnoses for their children for the purpose of qualifying for Social Security income?
 - This may likely increase parent referrals.
- Call Center
- How will districts / directors be notified of reported concerns that come through the call center?
- Why should district offer to evaluate students who have already been determined to not need an evaluation just because they are in RtI for +6 months, have a Section 504 plan or are exclusively in a dyslexia program?
- How will we receive the funds for compensatory services?
 - Will we have to fill out a grant application?
- We are suppose to evaluate every student in RTI who received supports for 6+ months?
- Evaluation Personnel shortage.
 - what are plans for addressing this across the region and state?
- Staff Shortage
- If these corrective actions are implemented as currently written, there will be a severe shortage of educational diagnosticians which most districts already struggle with.
- Compensatory Services
 - Concerned about how to determine the need for compensatory services.
 - We have students with high mobility who move in and out of our district.
 - Are we responsible for providing compensatory services when another district failed to provide the needed services for a particular student?
 - Who will decide what and how much of compensatory services will be provided?
- This will lead to many cases of mediation that will cost districts funds we do not have.
- This will lead to an increase in mediation and lawsuits because TEA has said LEA's are guilty of not identifying students when TEA is who put the 8.5% cap.
- TEA does not need to pay vendors to provide compensatory services that and LEA already provides.
 - Why are we going to spend millions and millions of dollars on a plan that will take away from students being served?
 - The entire plan is designed in such a way that we will very busy shuffling more paper and monitoring our monitoring systems.
 - Why can't this money be spent to serve students?
- A call center (SpedTex) is already in place. You only get one side of the story.
- Disconnect
 - There is a major disconnect between the plan and reality. The OSEP letter blames TEA and TEA is turning about passing blame to the LEAs. TEA needs to take responsibility for the mess we are in and change the language in the plan to be less blaming of the districts.
- Don't have records beyond 5 years ago. compensatory services
 - How will these be provided? Who will determine qualifications? Who will fund? TEA is the entity that failed our students according to the OSEP letter, they should fund.
- How is this going to work? (bullet 3 on CAP draft)...TEA will require every district to identify all students who were in RtI for 6+ months...
- RtI is going to be made out to be the "bad guy."

- Diags are already overloaded...how are you going to increase evaluations without supplementing staff??? Where do you get diags in an area where they do not exist?
- There is a new concern with opening up compensatory services where parents see the opportunity to get money.
- Key Indicators
 - What are these key indicators?
- Outreach Outreach
 - The outreach campaign will turn into a frenzy! We will be unequipped to handle the amount of referrals. Will TEA fund assessment staff to aid the districts?
- When will compensatory services be provided? How will we fund these services? \$5 million per year will not adequately fund these services.
- Personnel shortage for evaluation personnel.
- Compensatory Services
 - This will be a HUGE undertaking. TEA should be the one responsible to provide these compensatory services. In our rural area, we again are ill equip to handle these services.
- compensatory services
 - People who qualify for compensatory services, need to contact TEA and they should provide the vendors to provide
- the compensatory services. Perhaps an online program that will be available to all.
- Funding
 - LEA's will not be able to fund or find enough evaluation personnel to take care of the demand.
- Dyslexia under sped eligibility criteria because dyslexia relies on qualitative and quantitative data
- Districts would not want to negate a solid RTI process? What can be in place to ensure appropriate RTI processes are utilized prior to identification?
- Is the state going to provide additional funding to ensure a robust RTI/Child Find/SpEd program? Funds needs to be appropriated for these purposes.
- We need to ensure the third party facilitator used for the outreach campaign is multilingual.
- Since TEA limited our percentage of SpEd identification through PBMAS, how much responsibility is going to fall on the shoulders of the LEA and at what percentage is the state going to provide funding for these services and for how long?
- What will the 'key indicators' be?
- Again, the qualifications of the third party to assist districts.
- How many years will the compensatory service delivery go back? We are only responsible for maintaining records for 5 years.
- Who are we outreaching to?
 - How will parents be informed with the outreach campaign. We do not want this to be negative or adversarial.
- how to meet the 45 day timeline requirement when the "blast" goes out because of lack of staff and resources
- Money
 - The amount of money currently set aside will not be enough to cover all the costs for the evaluations that will result. For example evaluations for all the students who have been successfully making progress in RtI and now must be evaluated.
- What will be the determining factors for compensatory services? There are many variables that could change the outcome. You cannot just assume that they qualify now would mean they would have qualified in the past.
- What are "key indicators"?

- Why is it assumed that children who have had 6 months of services or interventions need a sped evaluation
- Determination
- How do you determine harm was done so a student would qualify for compensatory services.
- Rights and Responsibilities
- Corrective Action 2 states that TEA will contract with a third party to create and execute an outreach campaign to inform families and LEAs of their rights and responsibilities. We would like to see more education for parents as to special education, 504, Dyslexia. Our biggest concern is that districts have to test everyone referred for special education. Thereby creating a logistical nightmare.
- Timeline
 - We need to have a statute of limitations on identifying students.
- What does it mean that "some" of the costs will be funded?
- Wondering about "key indicators."
- Eligibility Criteria
 - Students who are now eligible for Special Education may not have met criteria at younger ages due to the degree of impairment relative to typically developing is likely to increase over time with some disabilities.
- Taking more money from Texas' schools & School children
- This plan takes \$3M more dollars away from schools to inform families of their rights. How much will districts then have to spend in legal fees to defend themselves?
- Lets know more about the outreach campaign...apprehensive about flocks of folks coming in for evaluations.
- Compensatory Services
 - How will we determine who is eligible for compensatory services? How will funds be made available?
- How can you determine a need for compensatory services when there is no clear data the student would have qualified if referred at an earlier date?
- Concerns about Parent Requests
 - We are concerned that we will see a significant increase in parent and teacher requests for evaluations.
 - We are not sure how we will manage all the evaluations requested.
- Funding
 - How will you decide who gets funding for "help" with comp. services.
- Part of the outreach campaign should also inform parents of circumstances when special ed referral is NOT warranted
- Lack of Funding for Legal Services
 - Cost of legally defending parent complaints/suits
- Updated guidance
 - There is already clarity among LEA's on how to conduct assessment. Training is not needed.
- Concerns and Advocates and Attorneys
- The initiative will empower them to request evaluations, perhaps without suspecting disabilities.
- Assignment of blame
 - The implication is that all districts are responsible for not following rules and regulations. Focus on those districts that are not conducting due diligence in compliance with Child Find requirements.
- Time and Manpower

- There are not enough qualified evaluators and the ones we do have Evaluators do not have sufficient time to evaluate all students who someone suspects of having a disability. Parents and teachers do not always understand what a "disability" consists of under TEA and IDEA regulations.
- educate LEAs on Conducting Assessments? Do LEA's not know how to conduct assessments??
- Compensatory services - where is the line drawn - how far back will we be required to go?
- Call Center
 - What is the goal of creating a call center? Will districts be contacted if parent complain via the call center?
- Additional assessments
 - How will TEA help fund all of the additional assessments that will be generated from this plan? The financial burden and staff burden will be astronomical.
- Legal & Fiscal Nightmare
 - How many years back will the compensatory services go? What if records have already been destroyed? What if districts and families don't agree on the compensatory services to be offered? What about Comp/ed services previously provided - will those not count? Who will provide the compensatory services when our teachers are already overburdened with SPED responsibilities including continued required remediation for a STAAR test that is not an appropriate assessment for many SPED students?
- Third party to create and execute
- What will be the knowledge and training; will there be a consistent expectation or a faq document to give consistent answers if you have third parties performing outreach?
- Advocates
- Will there be a cap on advocate or attorney fees to support districts who are evaluating students by parent request?
- ARDs
 - Time away from instruction will be high due to the number of ARDs this will create.
- Availability of personnel to actually provide compensatory services will be a concern for districts as we already have difficulty finding quality staff.
- Is the call center going to be staff with people knowledgeable of special education law (e.g., attorneys)? How will you ensure information being provided by call center is accurate and consistent among all staff providing responses? Is the call center expansion TEA or a third party entity? How is this staffed? Is it part of the 26 people?
- Will districts have an opportunity to provide input on the third party outreach campaign?
- Qualified staff
 - Presently the people simply don't exist to hire. How will you help with this. Again the burden on the school district is very high.
- What rights are we not explaining if there are no changes to the Procedural Safeguards?
- Qualified Evaluators
 - High cost of outside services and unfilled vacancies for in- house evaluators.
- Inappropriate standards
 - Schools are measured by an indicator of performance on 1 day of testing for an assessment - this leads to the idea that students who don't pass must have a disability.
- Compensatory Services
 - How will compensatory services be determined? How will it be monitored?
 - Funding for compensatory services and how are we going to staff this?
- What will the training involve?

- Compensatory Services
 - How do you determine how far back to provide? Many times a disability may not have impacted the student's ability to meet curriculum standards in early grades. (ex - SLD identified in third grade when academic achievement indicated the need to evaluate)
- Will they consider the unique characteristics of children needing assessment such as ELL students?
- How will TEA prioritize funds for compensatory services?
 - Will TEA consider district size in the consideration of compensatory service funds?
 - Vagueness of eligibility for compensatory services
 - The need for compensatory are going to be left up to the District professionals who already determined that students did not need services to begin with. This will take far too much time to analyze the need for compensatory services and is an additional burden to Districts who may already have solid practices in place.
- More requirements for identifying students in the RTI and 504 process, but no more funding to evaluate and hire more evaluation staff.
- Once teachers demonstrate content proficiency of PD provided, how will the implementation of those practices be monitored?
- Call Center
 - How will this function differently than the parent complaint process? Will districts be notified if a parent calls into the center?
- Adjusting the PEIMS-We have been trying to update them for at least 18 years. How are they going to get this updated in such a short time?
- We think a "Support visit" will be a painful process. It's a lot of red tape that won't help anyone. It will take us away from time with our students.
 - Are you only going to look at what you are suppose to monitor? What if you come in and start looking at other programs? I have had bad experiences in the past where programs that were not going to be monitor.
- How are you going to communicate to this group of people?
 - Some rural areas do not even have a newspaper and must rely on posted material at the convenience store and the bank. So how are we supposed to "get the word out"?
- What if I have great practices in place but my support team? Do I have to throw out
- Compensatory Services
- How are we defining compensatory Services? teaching to read? give PT/OT services? assist in getting a job for transition services?
- TEA will create a fund to support some of these services, but the LEA will ultimately end up funding the services- making this another unfunded mandate.
- What determines what efforts will be funded and what efforts will not be funded?
- Who will be the people involved with out reach campaigns and third party groups
 - They are going to control who will TEA listen to?
- When we open this campaign up for Child Find, if we start to get parents coming forward saying, for example, you only tested for dyslexia but what about special ed? Are we going to get thrown under the bus for actually doing what was accurate for the child and appropriate? We at the LEA level did follow your guidelines but who will TEA listen to? Us or the parents? They contracted a third party which is a problem in itself. We need to work with our parents. A third party creates an enemy effect which hurts our relationship. A third party will just place more distance between the parties.
- Retro Active Look
 - How far back will districts be required to review student portfolios?
- Out reach campaign

- This is scary. What are the key indicators? What will you be looking at? Town Halls- who will hold these? What will we say--"we were doing what TEA told us to do." This needs to be individualized. Appointments would be better for our district to speak to each individual family that had concerns.
- Who will determine compensatory services? Additional cost!
- "Key Indicators"
 - Wording says that families will be informed based on key indicators. What are those indicators? Will this informing be through electronic means, physical mailing,how?
- Records will be a barrier, how far back do we go back?
- Opening us up to litigation - YIKES!
- My concern is that RTI, 504, and dyslexia are becoming the scapegoat. These programs work! Just because a child is in an effective RTI program for longer than 6 months does not mean that SPED services should even enter the picture. Many of the students in my district that are in RTI are there, not because of SPED issues, but because of absences, home life, eco dis, etc... Just because those kids are in RTI for longer than 6 months doesn't mean they are SPED. There is a LARGE assumption here. The same for dyslexia. Just because a student is dyslexic does not make them SPED!
- The call center:
- Will you be punishing kids who didn't receive services through compensatory services?
- Financial/Staffing Burden
 - Texas is already in a teacher shortage situation. How will the financial and staffing burden be considered by TEA. \$5 million does not seem like a sufficient amount of money.
 - If this goes back to 2004, who is going to be reviewing all those student portfolios?
 - Diagnosticians, LLSPs are already overloaded with the number of SPED evaluations. How will this be alleviated?
- The Call Center takes us out of the equation.
- TEA will create a fund to support some of those efforts. We are not sure that they follow through. Where is that fund going to come from?
- Personnel
 - Where does the funding come from to hire all the additional personnel that will be needed to evaluate students, attend ARD meetings, be out of the classroom, provide substitutes, etc?
- The resources came from where? What if our district can provide these services - what does that look?
- RTI
 - Is the 6+ month requirement in the current school year? How far back does this go? We need more guidance on timelines. Does it apply to a student who is a Junior who had a 504 in 6th grade?
- Determination Criteria
 - How do you determine a student's qualification for students being considered for services? Will there be a template
- Will the add campaign include eligibility requirements that a parent can understand?
- It's like your automatically assuming that special education is doing a bad job.
- The measurement using RTI for 6 month, is not appropriate to identify growth to then determine compensatory services.
- Compensatory services
 - How? Where? When? Who gets to determine that? If a parent complains to TEA, does the sole decision go to the ARD committee? If the parent disagrees and goes to due process, what happens then?
- 6 months RTI?

- There is no state "plan" for what RTI looks like so how do we determine what 6 months of RTI is? Is it Tier I ? Each schools model is different. This process needs a much clearer definition for it to trigger a special education referral.
- Compensatory Services Fund
 - Will you really do this?
 - We have procedures in place that are in place, why do we need to make changes?
 - WE are making procedures to follow our procedures.
- Appropriate party?
 - What is considered an appropriate party?
- certification
 - So will my RTI interventionists and Dyslexia teacher have to be SPED certified to serve students because the assumption with CA 2 is that if we are not getting students caught up or "fixing" them in 6 months then they MUST be SPED.
- Plan of Action
 - What's the plan of action to serve a student who would have been eligible 10 years ago, but was not served because of TEA's
- cap?
 - Existing Systems
 - TEA has in place current networks that do not appear in the CAP. Examples of networks which could assist include: Parent coordination network, and ESC based parent training.
- RtI
 - This is going to cause issues with RtI. The campuses will struggle implementing additional changes.
- How will the ECS's be effected by this?
 - Will some of this fall on the shoulders of the ESC'S? Where will this funding come from? Will they be able to provide the support to districts?
- Wave of evaluations
 - TEA indicates that evaluations are the responsibility of the LEA. That is a true statement. However, it ignores the fact that USDE just ruled that TEA helped create this wave of need. Since it is TRUE that TEA created this backlog of need, TEA should find ways to provide funding to districts to help with the evaluations which are sure to follow the activities detailed in CA2.
- Funding
 - Increasing referrals = increasing services = increase NEED of staff, but NO additional money? It will also effect the OT/Speech/PT
- Law.
 - In 2004 the law implemented a new system of qualifying for special education services. The law stated that if a student is suspected of having a learning disability, that student should be given intensive interventions to see if he or she responds to make sure that there is not a lack of quality instruction but that the struggle is due to a true disability. What happens with this law?
- Timing
 - When will they receive these services? After school? During specials?
- Key Indicators
 - When TEA identifies districts for
- Transportation Cost
 - If we do Saturday school for students who pays for transportation.

- Template - another??
 - Another additional template (additional paperwork - bullet 1) that again could require additional paperwork which is in conflict with Rider 75.
- Key Indicators
 - Identifying individual districts for targeted intervention should not be based on the very data that TEA created by forcing districts to comply with PBMAS.
- Timelines
 - TEA is going to require districts to submit data on students. Give districts plenty of time to gather this data. We are talking months, not weeks. Also, will the district be looking back over 12 years? 6 years? How far back with the district have to research?
- My concern is funding. Is it first come first serve on funds available? There is a lack of personnel to support it. How are compensatory services going to be provided? How will compensatory services be defined? Frequency, duration, location? How will the call center be expanded? Will those in the call center give the same consistent message? What key indicators are going to determine which districts are targeted?
- Clean up the language concerning 504 and dyslexia also. How are we going to define it? We need clarity.
- We have concerns about involvement of a 3rd party and the funding involved in that. Couldn't that be funneled to districts and handled in a different way?
- Child Find is Child Find. How do you broaden the definition we already have? Is it just in the school setting or out in the community?
- There is limited staff already for evaluation. How are we going to manage the additional referral/previous DNQ?
- Evaluation staff cannot possibly evaluate every child that has been in RTI, 504 or in a dyslexia program along with current caseload.
- What would compensatory services actually look like for a 26-30 year olds?
- Use the money that will be spent on third party reporting- to LEA's to use to make the changes.
- Records in LEA's are not kept long enough to go back on a 30 year old.
- Why are we doing third parties? This is a financial drain?
- How do we know what children to locate and where they are?
- Third Party
 - A competitive bidding process must be followed and assurances that this third party software will really help the districts implement the plan.
- What is the difference between compensatory education and compensatory service delivery?
- Costs associated with required evaluation
- Define what creating funds for "some" efforts looks like.
- This is a money-maker competition for vendors...this is NOT putting the funding where it is needed.
- How will the need for compensatory services be determined?
- We can advertise, give us more specific parameters e.g. (T.V., doctor's office, website's, etc.)
- Testing kits are not always normed for the adult age group.
- Bringing in a 3rd party is worrisome.
- There are times when dyslexia is the best service vs SPED.
- Compensatory Services
 - We need more guidance with specific language on exactly what is considered compensatory services.
- Will dyslexia fall under the SPED umbrella?
- Training for LEAs on conducting assessments for any parent or party.
 - We need more clarification here as to whom is the "appropriate party."

- Burden is still going back to the districts who did not create the problem.
- We are creating a frenzy with parents and opening ourselves up for litigation for years. TEA will not even be able to support and respond to the frenzy that you are asking for.
- Having to contract with outside service providers to complete required evaluations will be costly.
- When are students supposed to receive services when admin tells service providers NOT to pull from core subjects?
- When are students going to receive compensatory services?
- If SPED services are needed, WHEN are students supposed to receive services?
- Limited availability to evaluation staff for small rural districts and SSAs
- How are we going to fund this- What does it mean that you will fund "some". How much will fall onto the LEA.
 - TEA will support some of those efforts
- We need more information here. How will support be given for 30 year olds?
- Will admin tolerate SPED services during the school services
- What about EDGAR and the procurement process?
- There used to be funds provided to districts to promote child find and those funds went away. Where are they?
- What about Prior Written Notice when assessment isn't warranted?
- Concerns about the 1% cap on STAAR Alt 2 students.
- Related service providers are getting a lot of flack from admin ~~ not allowing students to miss class in order to receive related services.
- Call center already at Region 10??
- The REED sometimes is used inappropriately. Some students are identified in second grade. REEDs are conducted and then by the time students arrive in high school, there may be a need for new data regarding disability
- Why are 23-30 year olds being served when our current law says SPED students are aged out at 22 years?
- Will services have to be offered if students have been incarcerated post high school?
- If adult students have passed away post high school, can families come back for monetary compensation?
- compensatory should not be handled by third party.
- conduct the assessments in a timely manner.
- Funding to the districts will be needed to accommodate this initiative.
- RTI
 - There needs to be a clear definition of RTI. TEA states that RTI is for ALL students, including struggling learners. ALL
 - students receive some form of RTI in many schools, whether it be for the struggling learner or the student needing enrichment.
- Language
 - Language needs to be more clear (deserve v. qualify...for special education). What is a 3rd party?
- Outreach Outreach
 - Use current processes around Child Find and Referral (Intervention Letters, Student Handbooks, Notices to doctors, etc.) rather than using a 3rd party where things might be sensationalized. The Agency should develop better guidance surrounding Child Find.
- Third Party
 - Instead of "third parties" create better guidelines/processes around Child Find at a local level - we have district and regional support systems already in place.
- Referrals
 - The plan states that the cost of identifying and conducting assessments will be the responsibility of the district. This would mean that we would have to add personnel to help

- Deserve, Really? NOT all students DESERVE special education services. Students are found eligible, or not, based upon evaluation and functioning data.
- Diagnosticians & SpEd Staff
 - We need additional diagnosticians to support the referral process. We will need more compensatory monies pushed to districts to staff diagnosticians and special education staff to meet the needs of children identified.
- Evaluators
 - We will need more evaluators than there are available. We will also need more protocols and test kits than the publishers have available.
- RtI
 - We can't go back to 2004 and identify students who had intervention. We need a definitive definition of RtI and what related documentation is needed.
- Evaluations
 - If 1/3 of our current 504 parents requested an evaluations, that number of evaluations would surpass the total number of SpEd evaluations we have done this year to date (August - February)
- Cost of identifying
 - With added emphasis on identifying students, there exists the possibility of a large number of referrals coming in at about the same time. This will cause an existing staff to either miss timelines or to have to hire additional staff. With funding not being increased, many school districts will not be able to hire additional people.
- RtI and dyslexia
 - If dyslexia potentially moves to special ed identification, those teachers should be 'grandfathered' in and not have to get special education certification to serve these students in special ed setting
- Call center --
 - Call center -- need to be trained --
- 504 -- many do not need specialized curriculum -- must do entire FIE?
- RtI- this looks different from kindergarten or 6th grader -- very different need and timeline
- Compensatory services for past students
 - IF a student should have been identified, the district would have been compensated for that student. Now for adding older students who now have to be served there should be additional weighting in the funding formula for the services provided for these students.
- Compensatory service delivery - \$25 million
 - How would this work? How far back would it go? You can not have a 25 year old in class with 15 year-old
- Compensatory service delivery
 - Highly concerning - - ex. If you didn't test an RtI student in 3rd grade, now a junior in high school -- full FIE -- this doesn't necessarily mean they would have qualified in 3rd grade.
- There needs to be a clearly defined RTI system for districts to follow. RTI is all over the place and done differently at every district.
- Legal Action
 - Does this not open the door for more lawsuits against districts, state, etc.? Thus driving up costs some more.
- How do we find additional evaluation staff to help with the requests that will likely come from the outreach campaign?
 - Districts do not have the resources to pull off this plan as it is written. The funding that has been in place has not been based on this aggressive plan.

- The timelines for the 4 parts of the plan do not line up. Some of the monitoring visits are going to happen before other parts of the plan are even implemented.
- How would we identify students that have already graduated. What's the limit of length of time they were not identified?
- How would you ever identify a child that should have been identified that has been in and out of RtI for any length of time? Is Dyslexia going to be considered a disability in Texas? Where will the funding come from for that many children?
- Provide funding for additional evaluation staff. (Diagnostician, Speech Language Pathologist, Related Service Providers)
- LEA is responsible to provide funding for students that have moved into the district, so districts have to cover the cost of higher mobility students
- Likely to have a huge increase in special education population. How will we fund instructional staff? Rural areas already have a huge shortage in certified and support staff.
- With publicizing Child Find through a 3rd party, districts will be burdened by additional assessment requests from parents whose children are under-performing due to effort rather than a concern for a disability.
- A call center for...
 - 1.5 million bucks when answers could be provided by technology instead. LEAs can do this as we have communication with our stakeholders on a daily basis.
- \$3,000,000 for an outreach campaign...when technology and social media could be used.
- With a student who is in RtI and making progress at 7 months, for example, we should not be REQUIRED to identify that student as Special Education unless the RtI committee (including parent) agree that a disability may exist.
- Districts will lose highly trained special education teachers/staff to TEA to be a part of the Review & support team
- Campaign = Litigious Parents Compensatory Services?
- What funding will be provided in the event the LEA is determined to have not provided services to a student or students who needed them? What is meant by "some" funding will be provided by this?
- Compensatory services?
 - How will that look? Money
 - Why a third party and how is this being funded when TEA has already added a lot of students?
- RTI process needs to have a clear definition of length and time
- More evaluation staff = less instructional staff
- How will disproportionality be affected?
- Local districts have been following state guidelines; therefore, any funding required for compensatory services should be provided by TEA.
- Staffing now is critical.
- We need to know timeline for LEA or as soon as possible.
- Funding
- Funding for evaluation staff, training, compensatory services, additional instructional staff needed once more students identified.
- When districts identify more students as required by TEA, will these districts then be dinged for disproportionality concerns?
- Is call center necessary?
- 6 months is too short. We are hiring and budgeting right now for staff for next year. How do we know what our staff needs are until this is released?
- Clarification
 - Will dyslexia qualification be moved from 504 to sped? Will funds be provided for this (no 504 funds right now and many dyslexia students)?

- How do we retain good employees and not create burnout due to high caseloads and extreme assessment needs placed upon our staff? Speech pathologists are already considering going back to the medical world due to fears of their caseloads and demands that may be placed upon them next year
- 3rd parties don't know kids.
- In regards to communication with parents...will this increase due process?
- RTI
 - RTI varies vastly from district to district. We need standards!
- What is the guidelines on getting extra support for those students found to needs compensatory services and where is the funding coming from?
- Third Party
 - Can TEA do their own outreach campaign? Lots of money spent. Technology can be used to provide the advertisement.
- Weighted funding for special education needs to be looked at.
- Time is needed for this to roll out effectively.
- Cost of evaluation will be high.
- What will effect of increased referrals have on SPP-11 and SPP- 12?
- Retention of good speech & language pathologist is already difficult. How are we going to keep these individuals when they can already go to the medical side and get more money and less headache

Guide and Support Team

- Staffing
 - There is already a shortage of staff and it will be difficult to meet the timelines for this.
- Time of services
 - There is no way of knowing an exact time a student should have been providing services when a school is already providing services
- PEIMS data
 - Not clear how you will adjust PEIMS data to gain adequate information for monitoring when we already give lots of information.
- 3rd party
 - Who is the third party? Is this advocacy? What are their requirements? Who will pick them?
- Outreach
 - How do we ensure every family? Mail outs? Call outs? What kind of documentation will be required? HOME phones don't exist - cell phones change constantly - Not all students have internet access - Large cost to a mail out
- Funding
 - Where is the funding coming from for this corrective action plan.
 - How will TEA determine which services they will choose to support with funding and how much?
- Staffing
 - How is Texas going to compensate for the shortage in staffing
- What will the call center be used for? personnel, funding ??
- 3rd party ??
 - this seems to be going backwards
 - What's the criteria for contracting with a third party will TEA utilize?
- Costs
 - Costs associated with compliance will not be funded except for compensatory services which puts districts in a financial bind with providing all the requirements.

- Trainings
 - What sort of assessment trainings will be provided? Are assessments going to be able to be conducted by personnel other than diagnosticians? Will there be alternative certifications for diagnosticians?
- How far back will TEA go to look at compensatory services and specific students?
- Comp Ed
 - Comp Ed money is not sufficient for the students we need to help now. Based on the uncertainty of School Finance - we don't know what it will look like in the future.
 - Must have a funding mechanism to help off set costs of providing the latent comp ed services that were missed by a late eligibility in SpED
- Why aren't we starting with a clean slate...? LEA can't control what has occurred in the past no more than TEA can. We should make the appropriate changes and move forward.
- How do we or TEA determine how the information is given to parents?
- Who decided 6 months was the maximum in RTI...is this all kids that are in Tier 1, 2, AND 3? We have many kids in Tier 1 and 2 that are making progress, but may require continued RTI. 6 weeks in Tier 3 is a concern. We need guidance here on what is acceptable.
- How soon will trainings for parents occur? What will this look like for LEAs?
- How do we decide who should or should not have qualified earlier?
- open for lawsuits on those that may have been in RTI and then Q for Sped? How will this be determined and do we have any protection
- Don't we already know how to address parent requests (or any requests) for evaluation? This will add to our reporting requirements
- Allowances for those in Rti more than 6 months
 - Will there be allowances for students who were making documented appropriate progress in Rti ? What about students in Rti process who were not referred due to lack of educational opportunity (students coming from another country with no educational opportunities)?
- Concern: Is TEA going to provide guidance on what the ARD committee should consider in order to determine whether or not a student should receive compensatory services?
- TEA proposes districts to identify students who have been in Rti 6 months...why did TEA choose a six month time period?
- Fiscal Impact
 - Consideration needs to be given to the funding support to Districts.
- Staff
 - This corrective action seems to point to the requirement of adding additional staff and contracted services, which also impacts the district's fiscal responsibility.
- Will TEA provide information regarding what the requirements for receiving Special Education are; ie. disability and the need for special education services. Having a disability is only one of the requirements. Will this information be shared with teachers as well.
- A barrier would be funding for additional staff needed to address the corrective action.
- Will additional funds be provided so that LEAs can increase evaluation staff, provide compensatory time, and hire teachers?
- How will LEAs be able to handle the influx of referrals especially for bilingual evaluations where there is a shortage of bilingual evaluators and diagnosticians.
- RTI should not be limited to an arbitrary amount of time due to the individual needs, strengths or weaknesses of each student.
- Do they have a rubric for going back and reviewing DNQ's.
- Not all students under RTI/504/dyslexia need to be referred for special education
- How many years back will LEAs need to go back in order to identify students?

- The 6+ number seems arbitrary. What if the student is making progress and is in RTI for 6+ months?
- Funds/Personnel
 - Smaller districts do not have the necessary funding or personnel to meet the influx of referrals expected.
- Will rubrics or templates be provided to LEAs to assist with the identification of students who were in RtI for 6+ months?
- Who are the vendors and what are their qualifications?
- Man Power to assess all student under this CAP?
- Funding for effective research based programs/interventions?
- Funding
- Outreach via 3rd party is a concern and should work closely with each Region personnel. Or have a position added in each Region to promote and campaign.
- Clarification on which tiers of RTI fall under the 6 months timeline and how will it be differentiated if the student is doing well. How will this be documented.
- RTI process and documentation must be standardized.
- RTI Best Practice
 - Align to a best practice model - the TEA's current interpretation of RTI is far from best practice, which has created rampant misconceptions across the state. Look to Florida, Colorado, Kansas...who have gone state-wide with MTSS and a robust framework to guide districts.
- The number of requests for evaluation could be off the charts.
- TEA created this issue, how can they now say that it is the districts responsibility to foot the cost.
- Uniformed RTI
 - We need more guidance from the STATE level on RTI and not depend on each district.
- How will districts determine what students "should have been referred for an initial evaluation"
- RtI
 - I think it is imperative that the language specific to RtI and further evaluation be teased out to be more specific. Currently not every student who is in RtI or 504 are in need of additional evaluation.
- Third party
 - The third party would have a financial incentive to reach as many families as possible. There should be a clear filter for those students who are currently in RTI to consider referral based on individual needs. The outreach plan is arbitrary and not designed to meet individual student needs. The plan currently states that the LEA is responsible for providing compensatory services but TEA has budgeted \$5mil for the entire state. Districts will be susceptible to legal ramifications if Child find violations are present. TEA should provide funding to fully meet the required compensatory services and aid in legal situations.
- There are far more students in the RtI process than the recommended 20% or less.
- RTI
 - The specific intervention could be a skill for a given amount of time, therefore, students in need of assistance will vary depending on the skill, this would require that more students be evaluated if in an RTI for more than 6 months. This is going to be massive. More guidance need to be given in order for special education referrals not to be massive.
- Guidance clarification for training parents on conducting assessment should also include a flowchart or design to request assessment. This would ensure that all the districts are following the same protocol.
- Child Find Campaign
- Some focus should be targeting classroom teachers (& possible student support team leads?) because often parents

- voice the concerns (and in their minds, the request for evaluation) to teachers who aren't knowledgeable about Child Find obligations.
- Not a need to throw the Dyslexia baby out with the bathwater. Dually served students is still an appropriate instructional model.
- there is no differentiation based on current percentage of students served in the district, from a district that has very low service numbers.
- Identify those who weren't and should have been
 - This plan overreaches and does not lead to identification of students who should have been identified but weren't leading to thousands of students being evaluated who do not need to be. This type of assessment is invasive and time consuming and can lead to stigmatization and should only include those students who are suspected of having a disability. This is why the language in bullet 3 in Corrective Action Two needs to be adjusted. You could be a student who has ADHD primarily inattentive who has a 504 plan to provide emphasis on major points and organization tools who does well with the necessary accommodations - this student does not need an additional evaluation for special education, but may have this plan for years. Under the current language, the student's parents must be contacted to offer a special education evaluation. But it isn't needed. The student might also receive 504 for a peanut allergy. This student also doesn't need an evaluation. Under the current language, they would be offered one. The language doesn't allow for differentiation.
- Third Party
 - What will be the required education experience of the third party contractor? Will knowledge of special education, 504 and evaluation be required prerequisites? Without this experience educated decisions will not be made.
- Unwarranted evaluations are very stressful on students and a Full Individual Evaluation must be used appropriately, not in a scatter plot matter.
- 25 million may not be enough for compensatory services
- Unnecessarily evaluating students who are proving to be successful with the current interventions and supports in the general education curriculum.
- Review of all RTI & 504
 - Many 504 are in the program due to medical issues and do not exhibit any educational concerns. Why would these student need to be reported or evaluated? RTI student who are showing growth and educational progress are also properly placed in their least restrictive setting, why should they be considered for evaluation as long as they are making academic growth and progress? Evaluation of these students will not support their education but only cause them stress and may cause them to question their successes.
- FUNDING & STAFF
 - These proposals will dramatically increase costs for evaluations and compensatory services to district and the amount proposed by TEA will not be enough to offset these expenses and this will negatively impact the education of all students.
 - It is already a challenge for smaller districts to obtain the needed staff, an increase in evaluations will require an increase in specialized staff that districts are already having difficulty finding.
- False positives due to developmentally inappropriate TEKS at early elementary.
- Limited number of trained assessment personnel to address the FIE needs.
- Concern that when people are pushed, professional quality goes down.
- In some districts the Dyslexia program is more intensive instruction than the SE program is allowed to provide due to LRE requirements.

- Prior to the requirement to contact the parent of any student that has been in RTI over 6 months, 504, or in dyslexia in addition to what is already mandatory, there should be a determination for the necessity of a special education referral for testing before that required notification. This would be in an effort to prevent possible over identification or unnecessary evaluations and substantiate the suspect of a disability. Districts should be allowed to use a screener for students using a pre-determined criteria demonstrating the need and validating the suspect of a disability prior to contacting the parent and notifying them of the opportunity for testing to consider special education services.
- Concerns
 - How far back will the notifications go? What is a reasonable length of time for these notifications to students that districts "failed to be identify?"
- Concern: How far back must districts go in the notification of the targeted groups of students? 2004?
- Concern: How will districts ensure the notification of opportunity for evaluation is received?
- Barrier: Where will the funds come from for districts to evaluate additional students in the targeted groups?
- Concern: If requirements for "Least Restrictive Environment" are considered, how is labeling a child for special education better than providing accommodations under 504?
- Concern: "Opportunity for Evaluation" - will this include students for whom a school team determined, based on data, that no evaluation was necessary and Prior Written Notice was provided? These students already had opportunity for evaluation.
- Barrier: Who is responsible for evaluating and potentially providing compensatory services if a student was in 504, RTI, Dyslexia, etc. in District A but now is in District B? What supporting documentation must be provided?
- Barrier: Lack of available qualified personnel to conduct evaluations and the lack of money to pay them if we can find them.
- Concern: The cost of identifying and conducting assessments will increase exponentially and crush smaller school districts who already have a hard time finding diagnosticians.
- Barrier
 - A third party will not know our students/families like we do -- what if our committee disagrees with the third party?
- Concern
 - What criteria will be used to choose the 3rd party? What background will they have?
- Concerns: LEA's should be allowed autonomy to make programming decisions for students based on an individual basis.
- Concerns: Districts below the 8.5% CAP should be the primary focus for monitoring.
- Concern: Providing compensatory services in an extended day will require even more funding due to having to pay beyond regular school hours.
- Concern: Training and direction be given by call center staff.
- Concern: A large number of our students are making progress in RtI and Dyslexia therapy and those with a 504 plan. 6 months is not enough for some. Why must these students be tested for Special Education? Wouldn't the LRE for these students be to remain in their current program receiving the successful interventions they are getting?
- Concern
 - What will the main focus of the call center be? Dissemination of information? Collect complaints?
- Concern
 - Who will conduct trainings on assessments? What qualifications will they have?
- Concern

- Would a district be liable for compensatory services for a student who has graduated, but claims to have been struggling and was not identified with a disability prior to graduation?
- Staffing and funding is insufficient to support compensatory services
- Concern
 - How far back do we go on Compensatory Services - how will the SOME funding be doled out to districts?
- Concern
 - Compensatory services for a student who dropped out? How far back?
- Concern: If students are being successful in RtI or Dyslexia therapy, where is the educational need?
- Concern: Requiring districts to go back and test all of those that have been in RtI will put at a tremendous burden on testing staff that is already struggling to keep up with current referrals within timeline.
- Concern: Over identification in high poverty areas will likely increase. Will districts be penalized for this?
- Concerns: Actions are very punishing not positive. Districts should be allowed to review monitoring before publicized. How do the monitoring visits impact student outcome? FUNDING!!
- Who is funding these plans. Plan #2: very negative on the six months
- Dyslexia
 - Testing for SPED any student who is in the Dyslexia program is unrealistic with the current staffs at LEA's.
- Comp Ed
 - There has been chatter that LEA's might be responsible for children who went through education even as long ago as 15 years ago. How will LEA's respond legally and financially to those who claim they did not receive educational services?
- How will they define who should have been referred for an initial evaluation?
- Funding
- Will support services come from Region 8? If so, will LEA's be funded to pay for these services?
- How will this effect current comp. ed. \$?
- Will we have to allocate a certain amount of comp. ed. funds to assessment services?
- Concerning evaluation, identification, and eligibility, parents and students have always had, and continue to have, a right to certain reliefs when they disagree with the decision made by their local school.
- These reliefs or processes that are already in place and are presently available to parents include: an Independent Educational Evaluation, dispute resolution, due process hearing, mediation, IEP facilitation, complaints to the Agency, contacting the special services director at the ESC, and/or support from the Parents Resource Network and Texas Project FIRST. Additionally, IDEA still requires LEAs to give Prior Written Notice of Proposal, and Refusal, concerning identification, evaluation, programming, and placement. Said another way, LEAs may still TISD SPED % by school year provide Notice of Refusals when it's information indicates a student does not have a disability or if the information indicates the student with a disability will not need Specially Designed Instruction. Most will agree that an LEA should not provide IDEA/special education entitlement for services to a student whom does not meet both of these two prongs of special education eligibility. The rights to Prior Written Notice as well as the processes for appealing are explained to parents within the "Parent's Guide to the A.R.D. Process" and in the "Notice of Procedural Safeguards". Parent rights related to both special education and Section 504 are also detailed to parents in the TISD Student Handbook. It is suggested that these processes which are already established be strengthened and invested in. Therefore, LEAs which have not received complaints or been investigated for failure to identify students for services should not be initially lumped into the CAP in the pursuit of potential non-referrals. And, unless there have been allegations made against them, is it a reasonable use of taxpayer dollars to require LEAs which have never dipped

below the 8.5% threshold to also engage in the expensive proposal of revisiting all past RTI/dyslexia/504 students for possible sped eligibility? Given the current processes already in place for Prior Written Notice, IEEs, due process, complaints, parental support, etc. it seems a much better use of state resources and school staff's time to not blanket every district with certain Corrective Action (CA 1) requirements. Why not use these dollars to strengthen the processes already there?

- Our school district has evaluated 597 students in the last five years using full time evaluation staff. Our district has over 900 students in 504 and another 500 in RtI on elementary campuses alone. Our concern is how to reasonably evaluate 1400 students in a timely manner given that it has taken 5 years to complete the process on 597. These students are in addition to any other referrals that come in that are students not in the count of RtI and 504.
- State Assessment
 - With a 1% cap on Alt Assessments by the Federal Government, how will that be effected by possibly more students being
- ID'ed for SPED? In addition, has the questions been asked to USDE how there can be a cap on that population, but there can't be a cap on other populations? Even though, the 1% cap still allows for those districts that go over to count their students in the Accountability System, increased monitoring will occur, which is seen as a punishment for serving students as has been decided by the ARD committee.
- New Students to the DIstrict
- What rules will we follow regarding students who transfer to the district?
- Why is special education responsible for general education programs?
- Not all students who are in RtI need to be evaluated for Sped services. The burden on LEAs to notify parents and test these students is unrealistic. LEAs have been doing their part to identify students.
- Need clarification on 6 month timeline for RTI?
- What data supports TEA's decision to include the expansion of the current call center. Is there sufficient data to show that the current call center does not work?
- Rights through procedural safeguard and ARD Guides are already in place.
- How do we reconcile the current Statute of Limitations that is already in place when determining comp ed services that may be needed
- Regarding the conducting assessments "for any parent or appropriate party" that requests it, will there be avenue for a school district who still disagrees with the parent request? Will the district still have the opportunity to write a notice of refusal?
- More clarification is needed to define the "outreach campaign". Will FUNDS be provided for LEAs to implement the outreach campaign as described in the plan?
- The cost of identifying and conducting assessment is the district responsibility where will this money come from if we are having to evaluate all RTI, 504 and dyslexia students.
- The increased cost associated with providing evaluations for what has the potential to be an excessive amount of students is still the responsibility of the district when many districts are already understaffed with assessment personnel. This is especially true for small rural school districts who struggle to find qualified individuals as it is. The evaluation process, when done appropriately, is very time consuming and expensive and our small district will certainly feel the effects of this mandate. The money must come from somewhere and I fear that it could impact direct student services if monies are shifted into assessment personnel.
- 5,000,000 that is included in this plan for Compensatory Services is BACKWARDS and a joke. That is RETROACTIVE and not PROACTIVE.
- Evaluation of all students that continue successfully within the RtI or 504 program will be cumbersome on already overloaded staff and a monetary burden.
- LEAs do not have the staff to take care of all the evaluation needs of all the students in RTI, 504, and dyslexia.
- Districts are already overburdened by monitoring activities. Does TEA have the data to support that MORE of these activities actually have a positive impact on student outcomes? If so, please provide.

- Identifying Students
 - Students served in RtI and 504, including dyslexia, who are successful and have documented progress are not in need of the specialized instruction provided under special education. In these cases, a special education evaluation is not warranted. When evaluations occur, students miss out on precious instructional time and unnecessary costs are incurred by the district.
- Students that are making progress in RTI up to or longer than 6 months, and are showing significant progress, are considered to be in the least restrictive environment and providing an evaluation just because of a TEA template timeline is not effective and would negatively impact that child's outcome
- What qualifications will be required of the pre-qualified list of vendors who will be recommended to provide services?
- Individual student data should be the basis for a special education referral, REGARDLESS of program placement, and to evaluate just on the basis of another template, seems like it could be similar to a cap on special education.
- What is the defined goal or targeted outcome for this action?
- Small school districts will struggle to provide compensatory services to students because of the lack of resources.
- Rural Schools
 - Consider the impact of contracting with compensatory service providers in rural areas. Oftentimes, rural schools have limited access to these services and increased costs when services provided at a significant distance are utilized.
- Federal Law vs. Parent Outreach for Compensatory Services
- How will districts handle parent requests when it contradicts federal law where parents are given a statute of limitations {one year} to appeal decisions through Prior Written Notice? Will the state appeal to the Congress to change this law?

Ideas or Solutions

- Parent Campaign
 - Concern that this campaign will be construed as if the DISTRICTS were hiding and/or misleading our families on information of our available programs and our child find efforts. Why assume we are doing it wrong?? Letters, notices, etc.....needless costs and needless assumption of fault.
- We are concerned of the requirement for compensatory service delivery. While we agree that there may be some students who are owed compensatory services, this is something that is extremely subjective and may compel districts to provide compensatory services even when they may not be owed. Who will make that determination?
- Compensatory Services....
 - How far back are districts expected to go back to determine at what point services should have begun and therefore how much compensatory service should be given? Guidelines (parameters) will have to be very clear and explicit - otherwise parents will expect services that will put districts in a difficult position due to parent expectations. This will potentially necessitate additional teachers, related service personnel, etc. which are already difficult to come by.
- Compensatory Fund??
 - How and who will determine which district will get some of the proposed compensatory fund assistance? Application? Percentage of funds? Where will these funds come from?
- There is a concern that because of this corrective action that districts may become in greater violation of disproportionality indicators. This will lead to further identification of students who may not be disabled.
- Pre-Qualified List of Vendors When will the qualifications be announced? Another way that independent contractors (private sector) is going to get rich from Texas education system. :(

- Money is supposed to be for kids and our districts....not private companies!
- Outreach Campaign
 - Isn't this already part of our Child Find efforts and/or couldn't it be requested/required as part of Parental Involvement responsibilities rather than place in the Special Education arena? We already have Child Find obligation? Wouldn't this be a duplication when it can be incorporated and supported in a simplified manner.
- Who will be members of this third party group?
- Who and how do you define "should" have been referred? How far back will the districts have to go to identify students who "should have" been evaluated?
- We already have a call center. Will this call center develop an advocacy group supported by TEA?
- What does it look like to add Dyslexia to SpEd? TEA made the criteria for SLD-Reading, so why didn't it distinguish or add Dyslexia at that time?
- Will a student with Dyslexia be identified as a student with a SLD in Reading automatically?
- The instruction for these two could be very different.
- Are we adding another disability category?
- Evaluating for Dyslexia and SLD-Reading are different?
- Will TEA develop new testing criteria?
- Who will develop the criteria for compensatory services?
 - Will there be financial compensation?
- How will the LEA fund the needed increase of staff to provide these new sped evaluations?
- If a student is in RTI and making progress and we don't suspect a disability, will we have to evaluate these students or offer an evaluation to their parents?
- Or if in Section 504, they have a disability, but they don't need specially designed instruction, do we still have to evaluate or offer an evaluation?
- In evaluating these students, will we follow the current evaluation timeline?
- What does as quickly as possible mean?
 - Districts need more guidance on Prior Written Notice practices.
- How will the TEA identify the students in RTI for 6 months or more?
 - Is this a new PEIMS requirement for districts to report to TEA?
- There is a shortage of qualified evaluators in the state. How will districts meet the assessment requirement when there currently exists a shortage of evaluators?
- What about students that were given prior written notice and were not tested because the team decided evaluation was not appropriate?
- What will happen with these students?
- Use technology instead of hiring auditors for the six year support visits. And use the funds to help districts provide services to children
- To have a consistency of forms or software to ensure that we are compliant with their expectations within the different programs with disabilities.
- To have clear guidelines on Dyslexia/504/RtI and expectations/criteria for eligibility in each of those areas. Consider using software to help so that everyone is consistent statewide.
- We recommend TEA do self-audits and send to TEA to save on cost and shift the dollars to programs and services.
- Put the money where the kids are. Direct funding for the students.
- The money saved using more electronic auditing could be used to fund additional evaluation personnel and student services.
- Can districts see/review the monitoring report before it is posted publicly?
- It would be helpful if the state consolidated the sped tech system so we were all on the same system/data.
- Region Center Support

- Can monies be allocated to our friendly region center so that they can provide some of the support services? Relationships are already established with districts.
 - This could cut down on travel costs at the state level, etc.
- Provide a ration for student services such as 85% for direct support for the students and 15% for administrative overhead.
- Consider self-audits...TEA could provide tools to support self-evaluation, with submissions to TEA under certain conditions
- Onsite reviews only offered when there is a significant evidence of non-compliance: PBMAS, parent complaints, etc.
- Consider partnering with universities to assist with audits; training would be a consideration
- Consider a gradient scale and if a district does not raise any red flags or scores a 5 out of 5 then they do not have to have a site visit from TEA. This would free up time for staff to serve students instead of gather documents which were already found to be appropriate.
- Expert sped specialist to answer at the call center
- How far back on compensatory services?
- Immunity from any lawsuits - example- 11th grade current sped student receiving speech only services, is found to have a learning disability- how far back should compensatory services be considered? A cap on services.
- Funding could go to ESCs as part of the outreach to include the support visits and build relationships for positive change in each region
- Have special education directors brought to the table when the plan is physically written like we do with assessment questions. This would allow "from the field" input as the information collected from the filed is reviewed and the plan is put together.
- Dyslexia
 - Change state law that makes dyslexia as part of SLD identification.
- Call Center
- Really...why aren't we publicizing our ESCs services more
- Compensatory services should be clearly defined by legal definition and case law so that districts are clear
- Results of Special Education Testing
- Some students, who are struggling, are tested for special education. However, if the student is in low cognition and achievement then the student does NOT qualify. These students need services but they are DNQ with NO support services.
- Maybe we should re-evaluate the diagnostic tools as well?
- Comp Ed Funding
- \$5M a year is NOT enough money to address the needs for 1200+ districts in the state.
- Testing of students that DNQ
 - Is there any chance of going back to an STAAR Accommodated for those students that DNQ, and are considered "falling in the cracks" between our current tests?
- The "D" in ARD means Dismissal. Isn't our ending goal to teach the student compensatory services and then dismiss?
- With the influx of referrals and a shortage of evaluators - increase days allowed For timelines
- Can the outreach program include factual information to private providers such as physicians, OT, PT, counselors, etc? They often do not understand the educational need piece of the equation and prescribe services. It could also include ways to work productively with LEAs.
- Will TEA provide funding for additional evaluations?
- When do compensatory services date back to?
- Must they be currently enrolled in the LEA to receive retroactive services?
- Rti for 6 months and Dyslexia if they are making good progress. Do they still need to be evaluated?

- All the communication with prospective parents appears to come before the steps helping LEA prepare for the possible increase in requests, whether they meet any reasonable threshold of suspicion of any disability.
- The outreach efforts noted in this action step precede the resources mentioned to address that. There needs to be a "pre-audit" that allows some LEAs to look at their own data first.
- Could possible report on DNQ covered under RTI, 504, dyslexia. Could report on 504, RTI, Dyslexia students who are passing/progressing state assessment, grades, etc. Are you accounting for glaring exclusionary factors for SLD?
- There is a concern for districts acquiring evaluation staff to handle the increased number of assessments. If a contracted service or consortium is established, can there be a pricing structure that is common across the state to avoid price gouging?
- If there is no need to visit a District, then there is no need for an onsite visit. Unnecassary on site visits will be a waste of money
- Get general education administrators and teachers involved
 - At this point, staff are looking at the special education director for guidance on what special ed is going to do about it. They do not currently understand that this is a general education, campus based issue that they will need to address and correct.
- Two separate teams: a team highly trained in compliance and review and a 2nd team highly trained in support and instruction.
- Instead of spending money on 3rd party vendor lets spend it on our students.
- More clarification needs to be provided regarding the 6+ in RtI, 504, dyslexia. 6 months seems to be arbitrary.
- Is the expansion of a call center going to be connected to the Region 10 call center?
- guidelines for 504, RtI
- Liaison from district should handle the "outreach" campaign
 - Agency should train the liaisons on how to conduct the outreach campaign
- Framework of the outreach campaign - criteria for dropouts, graduates
- RtI/504/dyslexia - framework for the data point criteria for referral to special education
- Get rid of compensatory or establish a formula or timeline.
- State of Tx needs to rethink the way it identifies dyslexia. Is there any other state in the nation that does not view dyslexia as a learning
- 504 is a law with no education guidance
- Need to clarify 6+ months of RtI. Tier 1, Tier 2, Tier 3.... Is the student making progress?
- What is the criteria for "should have been referred"?
 - That needs clarification.
- If a student is found eligible following several years of general ed interventions, who defines compensatory services?
 - What about graduated students?
 - Will they be entitled to return for evaluations and possible services?
- Who should be evaluated?
 - If a student was successful in Tier 1 or 2 RTI, or the Dyslexia program, then that student should not be required to be evaluated.
- Define targeted intervention.
- Define "Specially Designed Instruction".
 - If a student has a disability, but does not need specially designed instruction, then they are not eligible for special education.
 - IDEA requires districts to identify locate and evaluate all children who are in need of special education and related services.

- The law goes on to define special education and related services as
 - specially-designed instruction, at no cost to the parents, to meet the unique needs of the child with a disability.
 - It also specifies the term “child with a disability” to mean the child was evaluated and determined by the IEP team to have a disability (specific disability categories are listed in law) and who, by reason thereof, needs special education and related services.
- At no point in any part of the plan is there an emphasis on both having a disability and needing services.
- Dyslexia program should be reviewed by TEA to determine if these students should be considered as part of special education.
 - If they will be, then additional funding for districts must be considered.
- I believe Texas is one of 3 states that does not identify Dyslexia as a SPED disability
 - WHY?
- A disability that warrants the needs of specially designed instruction is what triggers the needs for a SPED evaluation.
- Would like TEA to create templates for the reach out letters/campaign
- Parents are provided information about their rights and responsibilities through the Procedural Safeguards.
- Has state considered the enormous cost of the assessment - will be an erroneous burden on the district ultimately affecting all students
- There are not enough diags in this state to adequately complete all of these assessments.
 - Will USDE bring in support or additional funding to contract - perhaps from other states?
- Dyslexia should be identified as a learning disability served under special ed. consideration should be given to appropriately funding this to ensure an appropriate level of service for students.
- Critical that districts understand that a system needs to be in place to be proactive with Child Find.
- Who will pay for the contractor?
- Assessments are there going to be different assessments?
- What is the meaning of third party and what is disability rights going to do
- Parent notification
- The state needs to fund this notification expense not the LEA.
- Utilize the networks (expand their scope) that are already in place (Parent Coordination Network)
- I like the idea of a third party. Most of this censure is due to politicians supporting their narrative that public schools are failing so they will fund vouchers.
- Updates for guidance - done in timely manner - should happen before CAP is finalized
- TEA has added additional personnel; they need to add/fund additional personnel to the LEA's also.
- Parent requests
- The LEA should not have to assess with only a parent request, without considering other school data on the student's progress before the student is evaluated.
- Independent Eval Staff
- TEA needs to make sure that independent evaluators can't price gouge for their services.
- Additional funding from TEA for evaluation personnel.
- Clear guidelines on RtI- when to refer to sped
- \$28M over five years not enough for this bullet
- Compensatory
 - Could compensatory services possibly be provided through an online platform hosted by the state?
- TEA provided list of vendors for evaluators (affordable) - TEA to absorb some of the evaluation costs
- TEA provides additional funds for the outreach (postage, newspaper ads, radio ads, etc.).
- Timeline

- Do not go back to 2004. The problem has been identified allow LEAs to fix procedure from this day forward.
- Additional Support
- ESC Call center will likely need additional staff
- look at the students who did not qualify for services - they had a disability but we not in need of specialized services at the time... What type of system is in place to review the progress of these students and how are they given services if the need arises?
- The consideration of manpower is important in providing the compensatory services? When will these occur.
- Create a system that tracks the students of private and home school students who have been tested and identified but FAPE services were declined by the parent.
- Minimally the parents should receive a ready willing and able letter to re-eval the student on the triennial re-evaluation date. Does your child need help now?
- Identifying High Risk LEAs
- Could criteria maybe include the number of "refusals to evaluate" have been used by the LEA?
- TEA should distribute the outreach campaign information within the LEAs
- Hearing Officers
 - Has TEA considered hiring new hearing officers for the complaints that will result?
- What corrective action is being done with the Texas Education Agency to ensure that accountability measures set forth by TEA for school districts are not punitive?
- Training
 - Training needs to be required for ALL Administrators at all levels including general education and special education.
- Let TEA come in to provide the services they feel the LEAs need to provide.
- Connect with the parent, notify them of the CAP, REVIEW STUDENT PROGRESS AND DATA, and offer opportunity for a special education BASED ON THE DATA.
- series of trainings requested should be reworded to allow for district determination and not solely on parent request
- Definition of who is appropriate to request an evaluation.
- Legislature needs to provide funds for compensatory services
- For consistency, add a virtual parent training in a variety of languages for the differences b/t RtI, 504, special education, etc.
- Comp Ed
 - If the LEAs are going to be expected to provide comp from the time he/she "should" have been identified? Can we also receive retroactive weighted funding?
- approaching to requesting evaluation should be based on student outcomes not a percentage
- Open a school in every region to provide compensatory services and pay for transportation
- instead of making unilateral CAPlans which penalize districts that are doing what they should, focus on districts that need the support and guidance
- Key Indicator
 - One key indicator could be how many "refusal to evaluate" the LEA has issued.
- Information about typical development should be provided or there will be an onslaught of evaluation requests.
- Are students in need of trauma informed care being given appropriate supports to enable them to have physiological (body chemistry and lymbic system) stability to allow neurological and cognitive engagement?
- Education

- We would like to see more education for parents and districts on what constitutes an appropriate referral to special education. They need to know what specialized instruction entails.
- We would like more guidance on the RTI process and procedures
- Compensatory Ed
 - General education/RTI interventions should counted towards compensatory services.
- Add focus indicators for prioritizing 504, Dyslexia, and RtI students to offer evaluations...NOT ALL. Some students are getting what they need and are successful...why not focus on those who are not progressing and set that standard of "progress."
- Rather than an outreach campaign, each district guarantees access for families and students of their special education rights, and the LEA's responsibilities pertaining to special education. Why reach out with service provisions globally, when they will be applied individually?
- Phased In Process
- Recommend phasing in the groups over time to distribute the work--first year focus on students in 504, next year focus on students in RTI etc.
- Focus on the Problem
- Strategically design requirements of this Action to be applicable only to Districts with a concerningly low participation rate
- Education - not just outreach
 - TEA needs to create documents that can be distributed to families on RTI/Comp Ed/Dyslexia/ SPED. These documents need to clearly define these different programs including the entrance and exit eligibility for these programs.
- Guidance
 - More guidance for all, in all areas, about the referral process and what parents can do at home in the areas of literacy and behavior.
- Establish a statute of limitations for compensatory services
- Provide a call center for Districts
- Provide legal supports for Districts that are addressing parent concerns so the burden of the cost for basic complaints, etc. are not on the District.
- RTI Regs
 - Redefine the RTI regulations. what does it really mean? Redefine the role in RTI in the referral process to special education
- Locating personnel and Funding additional evaluations
- LEAs will need additional personnel to provide all of these evaluations. As it is, it is near impossible to find evaluation personnel - especially those who are bilingual. Will Texas allow people from neighboring to provide evaluations without being certified in the state of Texas.
- Third Party Experience
 - Make sure "third parties" have significant experience in education.
- Allow Parents to access the rights they already have
- Provide supports for parents to file claims for child find violations rather than assuming all students who have not qualified or who didn't qualify before should receive compensatory services.
- State Funding
 - State funding needs to be addressed
- We WEREN'T doing it wrong to start with
 - We have to have guidance for making reasonable referrals and preventing over identification. And yet, we followed TEAs mandate for 8.5%.
- TESTING/Accountability

- If I have to back up and look at the kids I have in school, and we now identify them, and they now end up not graduating with an endorsement, that hurts my accountability. We will now have an avenue for having students no longer required to take EOCs and in turn graduate on foundation only plans that count against accountability.
- Why must we use a central call center? Why can't we have regional call centers
- A third party does not need to explain anything to parents because this third party does not know our district. Districts know their people and can do this.
- Define "some" of the costs. It seems like districts are going to be financially burdened to correct TEAs mistake. That is NOT fair.
- TEA needs to have set pricing guidelines for evaluations/assessments etc.
- District Monitoring
 - We feel that district monitoring is just a "gotcha" to school districts to say you are doing this wrong. They don't come to help us. It will just go out to make education look bad.
- Feedback
 - Never consistent from the monitor. One monitor will instruct us one way and then we get instructed a different way at the next visit.
- Have a state wide document to give to parents that explain the additional levels of RTI, SPED, 504
- Include vocational rehab for those adults that have not been previously evaluated.
- If we have to child find students post- graduation, this could be contingent on looking at drop-outs only or students that did not meet graduation requirements.
- Make sure the LEA's are included in this process and the training.
- Students across the state should be given a point system that is the same across the state- then classes are organized by point systems.
- Increase/provide funding, manpower, support to aid in implementation
- Provide guidance as to what is required for child find and some realistic suggestions for when to refer to RtI, 504 and SPED. Are there levels of where to start
- Put the resources at the local level to support the changes, NOT with third party vendors.
- Funding for evaluations
- RTI defined
 - Clarify what RTI students would need to be told about
- Funding
 - Funding to help with additional staff could be a one year grant to hire temporary personnel to conduct assessments.
- Compensatory
 - Push more compensatory money to districts so we can staff diagnosticians and special education teachers to meet the needs of identified scholars. Data won't improve if we aren't intervening at a campus level.
- Funding and Time
 - Diagnosticians are in short supply and will soon be covered up with referrals, compensation for those diagnosticians will be needed as well as funding to hire more.
 - Timelines for completion of testing and ARD may be difficult to meet.
 - Funding for summer testing for diagnosticians and speech pathologists.
- Maybe the 6 month mark is when you have a meeting to discuss progress and the student's individual progress/need
- 504
 - Students served under 504 may migrate to IDEA....why are 504 and RtI being scrutinized as providing inferior services?
- All a fair continuum of services.

- training based on TEA expectations - clarification of compliant practices
- Outcomes -- guidance and info on legal
- Support districts
 - TEA guidance must be supportive in nature -- language of documents must be coaching, supportive, and helpful
- An additional weighting for students who are due additional compensatory services could be included (while we are playing catch up).
- Do not implement more centralized funding...allocate training and funding to the districts.
- The identified weighted formulas have to be revised
- Accountability
 - Need a mechanism if a student was found to be in need of services earlier, but was in another district - who gets the hit?
 - We have lots of kids move in (high mobility rate) that are eligible - not fair for me to get a CAP based on someone else's issue.
- Consistency
- There needs to be clear guidelines on implementation.
- Funding
 - Availability of funding needs to be made clear. When and how will funding be made available?
 - Can we put some of the \$10 million a year into looking at what programs promote significant progress? That is what we need assistance with
 - Provide funding for 504 or dyslexia?
- Differentiation between 504/IDEA eligible dyslexia services
 - A system for ISD's to differentiate between students with dyslexia served through 504, gen ed or sped would be helpful
- Establish criteria to refer for special education
- Divert more money to school Districts to assist in this CAP rather than to the creation of staff at the TEA level.
- Identification of students
- Create a support system for districts to improve the areas of RtI, 504 and Dyslexia.
- Would the rubric look something like this?
 - Identify a DNQ, a 504 dyslexia student, a dismissal and do the following:
 - Date of DNQ, dismissal or 504 assignment.
 - Transcript or grade review
 - Review of any retentions since DNQ, dismissal or 504 assignment
 - If anomalies are considered such as: severe behaviors, lack of academic progress, lack of educational opportunities, family issues etc.
- Multiple referrals from different teachers Parent refusal?
- standardized procedure, rubric, clarity.
- Will TEA provide specific guidelines that will assist LEAs in providing some consistency with regard to RtI?
- Need to provide guidelines on how far back to provide compensatory services.
- What is the best approach to tackle the student's to test first. Give back to the region service center the training piece to the LEA conducting assessments.
- RtI in most districts is not consistent at all campuses. How do you regulate the progress monitoring or even the process to make it productive and equal.
- How is TEA going to get approval for funds.
- how will transfer students and students who have withdrawn be addressed?

- Add clarifying language regarding RTI and MTSS which has been adopted by some districts.
- Why assess students in 504 or dyslexia programs if they are successful with accommodations.
- Identification 504/Dyslexia/RtI The language in this section is problematic because it directs schools to "connect with the parents of these identified students not yet in special education and notify them of the corrective action plan and opportunity for a special education evaluation." This is as much a cookie cutter approach as the 8.5% was. Decisions should be made on the individual needs of the student. RECOMMEND: after "...or were exclusively in a dyslexia or dyslexia-related program." add a sentence "School districts must consider whether these identified students demonstrate a need for additional evaluation for special education services or if the student is making meaningful progress with current services under RtI, Dyslexia or 504." Then change the next sentence to read "The parents for students for whom an additional evaluation for special education services is warranted should be contacted by the school to notify them of the corrective action plan and opportunity for a special education evaluation."
- TEA will provide a standardized brochure and letter of information to every family in the district
- Using an all encompassing sweep to notify parents of a right to a special education evaluation is not appropriate nor reasonable. Many students are in the 504 program for nursing services and access that does not require or warrant a SE evaluation. There needs to be a unified definition of those who are currently demonstrating academic difficulties as the target group to be considered.
- Need to use a team review approach at the district to determine which at risk students will require that their parents be individually notified for consideration of a SE evaluation.
- If necessary, is TEA designating funding for districts. Guidance concerning LEAs conducting assessments on appropriate progress.
- Need to create a cap or higher percentage of financial support for districts to support the need for both assessment and compensatory services.
- Ensure that the outreach campaign is tailored to the various types of districts.
- Setting an expectation of 6 months is not individualized. Students making progress should not automatically be offered an evaluation.
- A student does not qualify for services until an ARD determines the need. It is not based upon the evaluation solely. Therefore, it is unclear how compensatory services will be determined.
- We need specific guidance on determining compensatory in the 2nd draft.
- Clarify use of funds for compensatory services on 2nd draft.
- Call center
 - Ensure those answering the call center have knowledge and training in special education and Child find requirements.
- Dyslexia and 504
 - If they are receiving the supports required to make progress, why offer special education testing
- RTI
 - Provide clear guidance and training to all educators regarding the use and purpose of RTI, including when a student is making progress and there is not a suspicion of a disability, then continued interventions may be warranted. Additionally, provide training that if there is a suspicion of a disability, the child should be evaluated and there is no need to complete an RTI process to evaluate.
 - Need a systematic approach for districts to follow to put review teams of district personnel in place to review the student records of those in 504, RtI, and Dyslexia to determine which would warrant an evaluation, contact those parents, and determine who to move forward in the evaluation process.

- Funding must be made available to the districts to meet these requirements, that may have been delayed, but now fall in a IDEA required timeline. District will be left at the mercy of outside evaluation agencies to fulfill timeline requirements or most likely not.
- Compensatory Services - already in an RtI process and 504 services - have had their needs addressed.
- What will the templates look like and how much time will we have to review the templates before the third party person comes out.
- Who will be paying for the third party person and the call center...or the better question to ask is where will this money be coming from. If you cut our funding anymore.....we will not survive.
- 6 plus month, how far back are they going to go back? since 2004 since no child left behind and PBMAS.....how will this impact us....what about the students who are successful in RtI. MOE concerns....it becomes the districts responsibilitythis will increase our MOE....we could go and do an adjustment on our MOE but if you are in a corrective action plan you can't do this. We need our funding to survive
- compensatory services??? how will we determine what is appropriate compensatory services....and how far back do you go. When is this compensatory services done....summer school, it's supposed to be individualized but the amount of funding to provide the compensatory services. There needs to be consistency from district to district, to ensure compatibility.
- Will there be a climate of hostility created when the third party person comes to educate the parent? We are left to
- TEA should use a rubric such as a bell curve calculation using the mean that indicates if a student is performing within an expected average functioning commensurate with their peers.
- Instead of dedicating dollars and committing evaluation staff and special education providers away from their current responsibilities with students to investigate the potential “should have been referred”, our district respectfully suggests that these Corrective Action efforts be directed to enhancing other activities at both the state level and the local level. At the state level: The Agency can refine the state’s capacity to respond to complaints, hearings, phone calls, investigations, etc. If / when there is a substantiated concern from a parent, a quick response by the Agency directed to the LEA in question will address real concerns, and be an immediate win-win for everyone. (CA 2)If that particular LEA needs additional Agency support or intervention then that level of monitoring would be understood. The Agency can address these exceptions in an efficient and effective manner.
- Provide funding and time for SpEd directors, ESC specialists and other educational stakeholders to work with TEA to create a “supportive” monitoring system that benefits the continuous process of student services.
- Special Education Director
- Instead of the call centers, consider additional staff to the ESCs so that LEAs and parents can get more personal support.

Anything Else?

- Stakeholders
 - Who are considered significant stakeholders?
- 3rd party facilitator
 - This sounds like more money spent. Will the 3rd party facilitator have any special education background? Or vetting process
- Stakeholders? should be parents
 - Parents attend ARD meetings for their children and meet with campus teachers and principals. They look for progress and trust the campus to do what is best for their child as we are the professionals. General ed teachers need to be invested in the change that is needed.
- Language of the CAP draft seems to lay responsibility of the 8.5 "misunderstanding" on LEAs –
- The statement that the 98 new indicators will not result in punitive action seems disingenuous when districts can still lose funding due to disproportionality.

- Who is the peer-review team?
 - How do we measure the benefit of the site visits? How are site visits related to student benefit?
- USDE corrective action was focused on districts that had child find and FAPE concerns not all districts across the state.
- How will the PEIMS reporting impact what districts are currently doing?
- We need just as much emphasis put on today moving forward as is put on looking backward. Training for NOW and doing it right moving fwd
- Concern for the funding of .5 M for technical assistance and vendor.
- Have we looked at the root cause for the 8.5%, this is what the CAP needs to address
- How do we pay for this given that with 98 indicators every district would trigger something?
 - Any of these indicators would be a loss given 15% would have to be reallocated.
 - MOE calculations would be affected by having to reallocate the 15%.
 - This is asking the impossible...
 - Criteria for "pre-qualified lists of vendors"
 - RtI handbook/framework to guide when to refer to IDEA 504 handbook/framework to guide when to refer to IDEA
 - Funding for additional staff for assessing students and staffing the continuum of services - this will need to be addressed
- As academic rigor increases and more students are possibly identi_ed as needing special education services will TEA address decreasing the achievement gap in a meaningful way beyond the Accountability system A-F.
 - Struggling students need more than a rating.
 - Campuses need support.
- What are the criteria for "should have been evaluated"?
- For districts where diagnosticians do dyslexia testing along with dyslexia therapists, if a disability is suspected the student is then referred for special education evaluation under IDEA - will this population be excluded from the corrective action?
- How do we de_ne should have been referred?
- Call center should include "work at home" opportunities for employees (such as retired special ed. directors). :)
- What happened to LRE and being a general education student first?
- Concerns of district hopping for evaluations when results are not what parent was wanting/hoping for
- For districts who use research based interventions and students are making progress, will these students be excluded from special education evaluation?
 - LRE.... What about giving kids the chance to improve/succeed before jumping straight to special education.
- Has TEA considered the fact that if you consider the state dyslexia population (that is being served) in addition to the special education population the combined may be more reflective of the number of children who are being appropriately served?
- Special education is not the magic wand for students.
 - Services in other environments need to be implemented first.
- Why do we have to pay a third party to create an outreach campaign to inform parents if the ISD already does this type of service
- Protections and accomodations Section 504 has more protections & accommodations than SPED
- The \$84 million.
 - As I understand it there are 2 possible sources for this money.
 - The first is from the Texas general fund.
 - The other is the IDEA grant.

- Assuming that the legislature does not give us the money out of the general fund.... we deserve to know during this comment phase what current programs will be cut from the IDEA grant to pay for this.
- Are we considering the categories of students being served under Section 504 when looking at who needs to receive a letter offering a special education evaluation?
 - Are districts supposed to offer a FIE for students who are under Section 504 for medical conditions
- We already have a system for checks and balances.
 - Now we are going to be pulled from educating students and providing appropriate supports and services to review an outsiders opinion of the districts procedures.
- Why is TEA assuming all district have not fulfilled their Child Find duty for all students.
 - It's like everyone is being reprimanded by something that was done incorrectly in these 12 districts, which do not represent Texas school districts as a whole.
 - Look at what the majority have been doing.
- Call Center..?
 - What will come of that...an upset parent expresses concern ..who will investigate those concerns ?
 - Surely there isn't a fund to just launch an assessment fund immediately.???
- Where is the 25M for Compensatory services going to come from and what services will we be proving
- So why do special education departments or SSA's need operational guidelines???
- If you are a Diag or LSSP retire now and contract with TEA.
 - Diagnostician's and LSSP's who are not able to get a job in public education will now be employed.
- What does the compensatory services look like? What "efforts" will TEA be funding?
- Comp Services
 - How will the need for comp services be determined?
 - What about exited students?
 - Will there be a complicated fund request such as High Cost Funds?
 - The atmosphere will create great issues between Districts.
 - Looks like we're building a business for private vendors!
- Why do we need training and guidance on assessments for any parent who requests it?
 - That is what we do on a daily basis.
 - Again, total inappropriate use of TEA personnel.
- All assessment staff, if guided correctly from supervisors, stay current in assessment procedures.
- TEA needs to collaborate and train CPS workers on educational and special education procedures.
 - Use all funding to train CPS in IDEA-B law and educational processes.
- If TEA needs \$84Mil to implement this plan - LEAs will need additional funding for sure to be able to implement the requirements
- Will compensatory services be determined by the ARD committee.
- Why can't ESCs be the third party in the Child Find process since they are already set up for that.
- strategic plan
- Please share what part of this CAP is part of the strategic plan? Can we review the plan?
- Is there any way TEA can work this plan without being retroactive??
- Clear delineation between DNQ and kid who wasn't testing in relation to compensatory services
- IDEA funds can only be used for ages 3- 22; what happens to compensatory services for students 22+ who have already graduated?
- balancing the request and actual need for evaluation; students who might qualify might have services delayed because of resources being allocated to others who do not need the evaluation
- How far back will the compensatory services go? If we find students that have been missed or overlooked how far back do you go?

- Money for compensatory services for LEAs
- What will be the basis for 'students who are found to have needed services and did not receive them'?
- Will timelines be extended?
- How is compensatory determined? Who has the final say?
- Will TEA provide literature/language for notifying parents of the corrective action plan and the opportunity for a special education evaluation?
- Documentation to prove the student was in RTI too long won't be available
- What happens when a child moves from districts to districts? Will build issues between districts
- What will be the criteria for choosing a third party that will execute the outreach campaign?
- Who will be making the decisions about this compensatory services?
- How will we provide all of these compensatory services? Money? Staff? When?
- Considerations: students with high mobility rates, students that fall under slow learner profile, funding, students in grades K-2 that may take time to adapt to school setting.
- Will there be specific criteria to know when a district has to test?
- Clarify between those who should be identified under IDEA or those to those that just need intervention. Is Dyslexia identified under IDEA or how will they categorize it?
- How do you prove that a student is "found to have needed services but did not receive them?" It seems difficult to prove they previously may have needed services.
- Lack of qualified staff to complete evaluation
- We need to review progress of the services before offering an eval only after 6 months
- We are already doing actions in our district to promote Child Find.
 - Will the third party take over determining a common effort that all districts are expected to use?
- Who tiers a concern at the call center? What is the process for the call center?
- How will TEA address exclusionary factors to determine whether or not a student requires compensatory services. It is presumptuous to assume a student would have qualified for services
- Will LEAs have any input into the outreach campaign in their home area?
- Outreach
- Is the contractor going to be paid to find the kids that need to be evaluated? Will this fall on the LEA? What will the outreach look like?
- increase of cost for districts to conduct evaluations and lack of trained staff to meet the demand created by CA2
- Who will be required to do the outreach campaign---funding of distributing it?
- Districts will never have enough eval staff to maintain the 6 month rule and will have difficulty maintaining timelines and DNQ rates
- What are the parameters for a referral? Are there priority referrals. Staffing is also a major concern
- More mediation and due process hearings
- Arbitrary 6 months timeline-- why 6 months?
- Will proof be needed from outreach campaign? What type?
- Will the funds for compensatory services be allowed to be used by LEA's for existing staff to facilitate FIE's during non-contract days
- how will compensatory services be managed? time, resources, etc
 - How are we defining what compensatory services are appropriate for each student? How far back do we need to go.
- If there are students who have been on RtI for 6+ mo., 504, and/or Dyslexia program, will that trigger a mandatory FIE even if a) the student data was reviewed and determined that a disability is not suspected and/or b) a PWN had previously been sent and progress is continuing on an upward trend for the student based on the current services?
- Currently there is a shortage in evaluation staff. Will TEA provide an incentive program for educators who would like to become diagnostician, SLP, LSSP
- Lack of trained people to test

- There may be an influx of evaluations based on the CAP. There will be difficulties funding and staffing enough evaluation staff
- What call center is being considered for expansion? SpedTex or the Dyslexia hotline, or both?
- What does compensatory services look like
- Parent Training and Information Center???
- Even though we believe that we are correcting things and moving forward, will TEA see it the same way?
- what is clarification on "some" funding for compensatory services
- TEA Compensatory services fund will not be adequately funded, the legislature needs to be providing funds for public education
- What is the plan for students who have already received an evaluation and were determined to not qualify, and now are 504 or receive dyslexia services through another avenue?
- If we identify more kids will our funding increase? Will there be a formula for dyslexia that will be similar? How LEA's going to fund this????
- Who is the appropriate party to request for assessing?
- At TCASE, it was clear that costs associated with providing compensatory services will lie with the individual districts. What is being referenced in the statement "TEA will create a fund to support some of those efforts"?
- Comp Ed.
 - What will comp. ed. look like? How is this defined? How will it be trained? Is it minute-for-minute? THE PRINCIPALS need to be trained.
- how long do compensatory services last
- With the outreach program, it can possibly lead to increases in disagreements between parents and school districts in identification. How will TEA support districts in possible increase in litigation? Districts need help in resolving real differences between the districts and parents prior to mediation or due process hearings. We need neutral professionals trained in conflict resolution to attend IEP meetings and to help resolve differences. Parents should be required to participate in resolutions or IEP facilitations prior to filing for a due process hearing.
- Design this to make sure that we are building trust for parents with the LEAs instead of taking it away. It can very easily create more issues
- What is the plan for smaller districts to support evals and compensatory services
- We need a phase in plan. Why is this applying to all districts?
- How will we identify students that need compensatory services?
- What about students that needed further referral after completing the Dyslexia program?
- What happens when parents deny evaluations or services?
- How will this impact the DNQ rate
- Are the numbers for dyslexia identification being considered as the district needs are being determined?
- TEA should require advocates have a certification, licensure, and board of ethics and formal training in conflict resolution.
- Recapture should be given back to the ISD's in order to have the funds needed to fund all of this
- TEA must change the funding for special education. The current model is antiquated.
- having general education teachers dually certified in with special education
- Certification
 - Yes to the above! Add in ESL Certification too!
- What is an "outreach campaign" look like?
- Do away with STAAR AND PBMAS! Go back to progress measures and ensure that students are showing growth not that they are all taking the same test.
- IEP teams need training on compensatory services.... What does or should it look like. How do you determine the need. What are you going to focus on, et.

- REACHING EVERYONE
 - This really is as much a general education issue as it is a special education issue; yet, it is falling on special education. It STARTS in general education.
- Have dyslexia evaluation specialist certified to give and interpret normative data since they are making eligibility decision based on normative data.
- Notify parents of districts that have not fallen into the 8.5 ditch.
- We need more collaboration between general education (Section 504/Special Education/Administration, dyslexia).
- Will this third party collaborate with each district to develop the outreach campaign specific to each districts needs
- Understanding that dyslexia is a disability. The question is knowing how to identify and appropriate supports and services based on the individual needs of the student.
- IDEA Reauthorization
- This would be a GREAT time to reauthorize IDEA... Go back to the beginning and look at the original intent of special education...
- what are other states doing? is this a more robust plan than other states are doing
- We do not feel that these are truly going to be "heard" and that we are wasting our time.
- parents continuously report that they specifically move to Texas because of the model of dyslexia services here
- STAAR
 - I believe many parents feel that the special education label will excuse their student from taking or having to pass the STAAR/ EOC exams. In my experience that has been the reason for many special education referrals. How can we adjust for that? Going away from the Modified STAAR has created many problems for special education and impacted special education referrals.
- We are already seeing an increase in the number of referrals and many of those students are not qualifying. General education needs more support first.
- Don't we already have a plan and timeline for Child Find?
- Call Center
 - Whats the point? Where does the info go?
- funding for compensatory
 - Funding for compensatory services is 1 thing but finding the people to do it is another.
- What happened to the original plan that TEA will require every district and charter school to identify all students who were in the RtI for 6+ months, only had a Section 504 plan, or were exclusively in a dyslexia or dyslexia-related program? And then offer them a special education evaluation? Has this been removed? If it has not been removed, LEAs have a grave concern about the ability to fund and to implement evaluations on this scale.
- Graduation
 - What about the kids who have graduated, say two years ago, never passed EOCs and now parent wants them tested for sped. We missed them, How will that affect us if they qualify? What if they are already 21? Ramifications? Procedures? Etc.?
- What about public school students who's needs were not being met and moved to private education? Will those compensatory monies be given to private entities?
- Retroactive? Statue of Limitations?
- Will the students that are still awaiting graduation because they are under the TAKS system have a case against an LEA for denial of FAPE?
- Over identification of Students
 - We currently have processes in place to determine appropriate evaluations. is this going to change?
- Resources to describe the various programs.

- I don't have an issue with educating parents, but is the resource going to create a bias toward or against any of these various programs?
- It appears that the expected outcome from USDE and OSEP is that we identify more students, so what keeps LEAs from putting students in SpEd rather than the appropriate program just to get the numbers up?
- Realism
- If you are going to look at compensatory services for students age 18-30, if they met graduation requirements, let's move on and serve the students in school
- Everything that you have proposed in some form or fashion has been tried in the past. It isn't working.
- Compensatory Funds
 - Will these students be eligible for SCE funds?
- Outreach Campaign
- We don't need a third party!
- Dyslexia -- if moving it under SPED -- this will be a huge move within the state -- personnel concern -- services concern -- evaluation timeline/demand on eval staff
- Third party
 - Third party monitoring is not a good idea. Rarely do third party monitors know what school do.
- More guidance on the identification of the students who have been identified for RTI. Does RTI mean any tier of instructional support? Depending on this answer then the evaluation process with timelines in a larger district will be impossible to test
- Again, TEA is contracting with a 3rd party and they have already hired 38 staff members while the districts get no extra funding to assist them.
- We followed the "rules". If the "rules" were the problem and we didn't make the "rules" then why are we the ones that are financially responsible for fixing the "rules"?
- If a district can show need for additional funds for evaluation will there be a process to get more funds?
- Support
 - Who is going to support the districts
- Difficult to get parents to attend functions at the school now, how will the outreach campaign target the need for the families
 - We can't them to attend a second grade choir program let alone an information meeting to tell them their child is "special"
- opening up a can of worms
- Guidance
 - LEA's will need guidance on how to identify those who will need compensatory services
 - Why should LEAs that were abiding by Federal Law and well beyond the 8.5 number, be subject to the same corrective action plan as those that were under-identifying students.
- TEA Website
 - Make the TEA website user friendly for parents so that they have easy access to information regarding SPED, 504, RtI and Dyslexia
 - Charter schools service all students from many districts, students who have been identified will transfer in and the population increases. How can we clarify this?
- Clarify the call center expansion as being through TEA or the district
- The cost of additional evaluations cannot be ignored by funding options from the state.
- Increasing the number of evaluations that may be unwarranted, opens the district to liability, as well as provides parents with the right to an IEE that they really should not be given.
- Strengthen guidance for RTI.
- in my district alone, with a SE pop of 250, 12.3% of district enrollment, the scatter offer of evaluations to parents would amount to 796 evaluations - cannot be done.

- the cost of a FIE within the district is about \$1,000, and through contracted personnel outside of the district the price runs \$1,500 to \$2,000 +.
- clean up the mess after the third party person leaves.
- RtI and exclusion factors must be considered and not necessarily result in an evaluation.
- What would be the criteria for determining compensatory services?
- How will the people that provide compensatory services be determined?
- What will the training for LEA's on conducting assessment look like and will it be required for all assessment personnel?
- What would they look out to determine who should have been tested
- Can compensatory services be provided by college students?
- If students are making progress, Compensatory Services are not needed.
- We are talking about students not identified.
- We agree with what one of the directors pointed out regarding policies and procedures be developed by TEA before making the districts jump through hoops to correct TEA's mistake.
- What information will be included in the letter to parents?
- It would save TEA time and money to identify specific districts and not Texas as a whole.
- Most school districts in the state of Texas have not participated in the practice of not referring students for special education testing due to the 8.5% cap. Districts at or below the 8.5% cap should be the target of the Corrective Action Plan since this would be more indicative of a district attempting to stay in compliance rather than the natural fluctuation prior to the cap placed on districts by TEA.
- Definitive explanation of terms used.. appropriate party and key indicators.
- How are schools going to be required to connect with the parents?
- TEA should fund all costs superseding a set amount to fulfill obligations.
- Paying for the test kits and protocol will be a significant expense as well
- If students are making progress, Compensatory Services are not needed.
- Does TEA realize we will be losing Special Ed teachers/staff if they have to go back and do all the requirements demanded of them, and we all know that there is a shortage in that area.
- Steps outlined in the plan do not match the outcomes given
- 8.5%
 - I think TEA needs to step up and own that there was an 8.5% cap placed on LEA's for SPED Identification - and if an LEA was over that additional monitoring was required, which also meant the LEA's would have to put time and effort toward that monitoring. Currently, the media makes it appear this was a district's choice - own up and tell the truth so that Public Ed isn't looked at once again in a negative light. Appears very political to the LEA's - as if one more time to say "see this is why we need charters and private vouchers." Charter's because they receive public funds, should have to take all students that apply and keep all students, even if attendance, discipline, or educational issues arise, just as public schools have to.

Corrective Action 3 Responses

Barriers or Concerns

- Free for all for VENDORS.
- Student Rights
 - What protections will students have guard against inappropriate referrals?
 - What safeguards will be in place for inappropriate referrals? All of this action will bring about a lot of inappropriate referrals.
- Call Centers do not give contradictory information to parents.
- Clear Cut Guidelines & Timelines
 - Need specific guidelines and criteria for determining timelines. This way there is no misinterpretation, break-down or delay to identify the learners with a "true" disability and educational need.
- Resource Suite
 - Resources that will differentiate the programs is not necessary. Those funds again should be allocated to the districts and the students rather than third party (private sectors) vendors.
- The concern would the cost LEAs would incur in the dissemination of all this material.
- Guidance
 - How soon will guidance be provided for ensuring supports are provided for struggling learners, RTI, 504, and Dyslexia program? Should we prepare prior to the timeline indicated?
- Professional development...
 - Prof. Dev. should also include training in regards to developmentally appropriate levels of development so that teachers gain a greater understanding of student functioning...
 - I.e. what is appropriate? When it's appropriate, etc...
 - How will the professional development continued to be maintained?
- 504 is a law with not education guidance
 - Currently there are two references to RtI in state rules. 89.1011(a) states prior to a referral, students experiencing difficulty in the general classroom should be considered for all support services available to all students, such as ... response to scientific research-based intervention. 89.1040(c)(9)(A) states that prior to and as part of the evaluation, and in order to ensure that underachievement in the child suspected of having an SLD is not due to lack of appropriate instruction in reading or math, the group of qualified professionals must consider: ... (ii) data-based documentation of repeated assessments of achievement at reasonable intervals, reflecting formal evaluation of progress of the child during instruction, which was provided to the parent of the child. Data based documentation may include ... Response to intervention (RtI) progress monitoring results. If RtI is now being discounted, then these references need to be removed.
- TEA will revise the Texas Dyslexia Handbook
 - Please remove the History of Dyslexia or reword it to be an objective history rather than a personal narrative expressing the opinion of one individual. Since the plan only address clarifying the difference between dyslexia and dyslexia-related services, Section 504 and RtI, where does special education fit within dyslexia? Will dyslexia continue to be a general education program or will it be moved under special education? If it will become part of special education, will eligibility rules should be followed (dyslexia or SLD since many districts the criteria for dyslexia is less stringent than the SLD regulations)?
- Call Center

- There needs to be a mechanism to provide feedback to districts regarding calls being received from parents within the district. I am not suggesting providing the name of caller but rather information on the topic of the call. Parents do not always contact district staff with questions but instead call other resources such as
- SPEDTex and TEA.
- Professional Development
 - The training for identification and related child find needs to be separate from the inclusive practices and instructional techniques. Training on child find needs to reach a much wider audience including administrators, counselors, nurses, secretaries, etc. as they are often the one fielding questions and/or phone calls. Administrators need to be required to participate in the training as well as the classroom educators. Needs to be a mandatory part of all teacher preparation programs.
- Dyslexia/504 Support
 - What exactly will be monitored when there are no rules and regulations for Section 504 other than the Rehabilitation Act of 1973. In addition, 504 is about equal access and anti-discrimination so how would that be monitored? Since dyslexia/dyslexia related and RtI programs are district designed, how exactly does TEA plan to monitor the implementation and application of these programs?
- Funding for professional development
 - Potential teachers are not trained in RtI at universities. Why is the prep part of these needs not being addressed? Universities need to set the framework for students wanting to become teachers.
- Resources
 - How will resources be defined for the different populations: RTI, Dyslexia, 504 & SPED?
 - Monitoring teams must provide consistent information to districts
 - Years ago the DEC teams gave a different interpretation of rules for their visits. It was frustrating to hear that a neighboring districts visited by different teams were given different monitoring citations.
- Inclusive Practices
 - Will the state provide resources for consistent implementation of expected practices for differentiation between 504, dyslexia, RTI and SPED eligible students?
- State wide Professional Development needs to be a requirement for all educators that provides a framework of alignment for RtI, 504, and IDEA. This is not available.
- If consideration is being given to moving dyslexia to special education versus Section 504 - what professional development will be available to help diagnosticians identify dyslexia?
- Guidance Documents
 - Based on resources listed, who will determine if it meets the criteria of clear guidance to parents on when or could be tested?
- Context
 - #3 conflicts with #2. Why are these resources to be available AFTER the information is to be out to parents on evaluations. Seems that this information will form the foundation to determine which students, so ill-defined in #2, are to be considered as being suspected of having a disability. The timeline for this guidance which will essentially define "specially designed instruction" needs to be provided before parents are informed that their student may have been unidentified under IDEA.
- Professional Development

- With the statewide professional development on inclusive practices, has there been thought to who will implement and the budgetary increase needed at the district level to follow through on implementation practices?
- Funding
 - 504 is not about academic need
- "Call center" must communicate with districts because there is ALWAYS three sides to a story
- I like the idea of TEA providing a training institute particularly for both the general education and special education teachers together.
- Call Center
 - How will the call center communicate with districts about calls received from parents and other stakeholders?
- Why are we giving RFP's to parents?
-
- Will there now be a RTI plan in place?
- Will the call center provide answers in the language of the parents?
- Will the Call Center act as advocate for the parent with the districts?
- I foresee counsellors being appointed as 504 and dyslexia experts. This increases the need for funding to increase counselors.
- What is the criteria to determine expertise in dyslexia? Funding for the professional development, where is that coming from
- Where is the funding for dyslexia testing, teaching, and assistive technology?
- Training for teachers will include what? How will it be executed? Who is responsible?
- Screening process guidelines from parent communication? Who deals with in flux of testing request? Who pays for testing that may not be necessary?
- Who oversees RTI to dyslexia testing and what guidelines are in place for committee determination?
- Funding for PD
 - Will state pay for district-level expenses? Substitute teachers, summer stipends, travel, etc.
- It is important to have better guidelines for RTI, 504, dyslexia, IDEA. Guidance has been spotty for each of these areas. We have noted that we get conflicting information for each area. Professional development is needed asap.
- Time and funds for professional development. Teachers out of classroom.
- Will the call center keep documentation of the questions asked and the answers provided and then provide those to the districts?
- When and where will the professional development be provided and who is funding this PD? Also, who is developing the PD, will it be research based and peer reviewed?
- Dyslexia needs to stay with 504 unless there is another qualifying disability. Who will be paying for the professional development? How will the PD be implemented? The plan states that all participants of this PD must demonstrate content proficiency and implementation before being noted as having participated in the full program. How many LEA staff members must meet this requirement?
- Dyslexia
 - Will there be additional funding for Dyslexia?

- Is Dyslexia going back under special education?
 - Training for Staff on Dyslexia
 - ESC does not have highly qualified trainers for dyslexia. In addition, hardly any workshops on dyslexia is being offered. We having to look at other ESCs to provide training resulting in additional costs for staff's hotel stay and travel.
- Dysgraphia
 - Is the state looking to the feds for this money after the \$5 Billion cut to education proposed by the president in his 2019 budget proposal this month (February)?
- PD
 - How will teacher proficiency AND implementation be measured?
- RFP for Resources
 - While this is great, when will districts be notified. There is a lot that goes into effective implementation of new resources/processes if we want our teachers to use fidelity.
- High Qualified Staff for Dyslexia
 - Districts lack highly qualified staff members to provide dyslexia services
 - Need funding for dyslexia staff and programming
 - Specific funding for 504 funding Dyslexia intervention
- Identify what the state will use. The State is all over the place with dyslexia intervention. In addition, what training should all teachers who work with students with dyslexia?
- Specific funding for 504 instead of district decision for local monies.
- Informing parents of their rights to have a child assessed
- The districts provide information annually for the right of the parent to request an evaluation. It's in the student handbook, a flyer is sent home in the enrollment packet at the beginning of each school year and it is on the school district's website.
- Parents are informed and the school holds training sessions for parents. We don't need to pay a third party to come in. Parents are connected with their school and trust them. They will not be open to a third party vendor.
- The districts obligation to Child Find has never stopped, so to have a corrective action seems ineffective.
- All parent requests for evaluations are addressed. Most all children are evaluated upon request, although a significant number do not qualify after the whole evaluation process is completed.
- What are the "key indicators" that will be used to target specific districts?
- Training - Training for assessment staff could be positive but it isn't going to create more assessment staff?!
- Are the district going to get more funds also to create "teams" to carryout this campaign?
- Compensatory Services - Who will make the determination if comp services are required? How will the funds be allocated? When will funds be available? The timing of determination and funds available is going to be critical. If amount of comp serv are unknown until October, that is too late to adjust staffing for this school year.
- To send letters to EVERY parent of a student in 504 and RTI is a huge undertaking and will create unnecessary referrals thus invalidating the whole special education process. Are we evaluating just to evaluate or really analyzing whether or not there is a need for specially designed instruction?
- locating and funding additional assessment staff to meet the increase in testing

- The number of students in RTI for 6+ months may be extremely large for some districts. Evaluation staff and timeline is not feasible for this number of students?
- There should be limitations to how far back districts should be required to go in terms of providing Compensatory Education.
- Taking out the word ALL students. Consider looking closer at the students with a suspected disability— sheer numbers and cost would be overwhelming to the entire system
- Follow IDEA- in order to evaluate, one must suspect a disability. Not all students receiving RTI, 504 and/or dyslexia have a suspected disability under IDEA
- Where will we find and how will we fund additional assessment staff when there is already a shortage?
- We already are charged with evaluating students who are suspected of having a disability,- so what are you defining as a suspected disability?
- The corrective action plan form USDE addresses students who should have been evaluated... based on what? If we look at IDEA then only those suspected of a disability. In addition, if a student is responding to intervention, then law states no need for testing.
- Will funds be provided for compensatory services? And what is the statute of limitations for providing services?
- For testing, does this include students who DNQ
- For testing, does this include students who DNQ'd
- For testing, does this include students who DNQ'd or just those not tested under special education?
- Just because a student is in RtI does not necessarily mean that we suspect a disability.
- How will we respond to the potential increased in IEEs?
- If a student is tested and qualifies in the 4th grade, are we supposed to provide compensatory services from the time they entered school? How are you supposed to determine how long compensatory services should be? How can we objectively say the referral should have been made previously?
- How far back? Is it to 2004, is it going to follow the statute of limitations?>
- Since we have been following guidance and expectations of TEA yet now have to make corrective actions based on that guidance, what funding, resources and staffing support will TEA provide for LEAs?
- The point of Responsive Intervention is to intervene at the earliest possible point.
- Many students respond. Some take more time. RI is not to be a straight to Special Education.
- How will districts handle the influx of needs for the evaluation? There are not enough qualified assessment staff in the work force currently, so districts will not be able to find staff to complete these assessments
- Will TEA provide additional funding for evaluators?
- How will we address compensatory time and what about students who are now in college and want testing/compensatory services?
- Compensatory Services: IF eligibility is established for students who have exited high school, how will compensatory services be determined?
- Students who graduated and parents feel they did not receive compensatory services, will they receive services now that they have been out of school for seven years?
- What is the call center going to do? Address concerns about?

- Who is responsible for notification of opportunities for Special Education evaluations?
- Will timelines be adjusted to allow for the influx of assessments?
- Does this also include adult readers?
- Outreach campaign requirements should not impact student services - town halls, public meetings, letters, emails, individualized parent support all take time to prepare for and reduce time with kids.
- How will comp services be addressed...what does this look like? After school, summer, etc.???
- Is TEA paying for the costs to provide information to all families in the district?
- What are the “key indicators” that are utilized to target specific districts
- What criteria will be looked at for the 3rd party?
- Third party administrators are a concern.
- Outreach campaign will impact the LEA’s budget. Mail outs and locations for town halls, etc.
- Are we going to have a staggered timeline to evaluate all of the additional students included under RtI/504/Dyslexia? Do we need to look at specific programs first? Completing all of these in addition to already high numbers of initial referrals within the 45 school day timeline is a huge concern.
- Additional funding for retired teachers to provide compensatory services during the summer.
- What does TEA mean in regards to establishing a relief fund to provide "some" of the cost?
- Students who are in RTI, 504 and dyslexia should be considered for an evaluation only if the student exhibits a need for special education services. LEAs should not be required to evaluate students who are making progress in these programs.
- Lack of money to help pay for and lack of the number of qualified personnel to test these new batches of students from RTI, Dyslexia, 504, and those that might have been missed.
- Does RtI encompass Behavior RtI and content areas outside of Reading?
- Parents will not call TEA with concerns. They will call locally. Instead of a call center at TEA, put that staff member at the Region Service Centers to address concerns more locally.
- Many students are being served well in these programs but the wording would indicate that it is a problem to have not been tested for special education first. If we are truly looking at LRE we should ensure students are provide support at a level that is appropriate and if deficits can be overcome with a 504 plan, what specialized instruction is needed? This confuses parents who believe that every student who is identified with any type of disability should be in special education. This is the discussion that needs to happen with parents....what is specialized instruction and a student must need that level of support to qualify.
- For purposes of compensatory services, how will we determine when services should have begun?
- How can you make such a widespread decision when data only came from 12 school districts and we have 1,247 districts in the state. We are making a plan based off approximately 1% of data which was not a random sample, it was hand picked.
- Concern about training...what kind of training will it be and would this be a TOT model where TEA trains ESCs and they in turn train districts?
- If a student is progressing through the general education curriculum adequately in 504, dyslexia, or rti why do they still need to be referred for special education testing?
- RFP process for vendors would take longer than what we have done before for contract services.
- How will TEA determine who the vendors are, what supports they will deliver and what the process will be to access those supports?

- Is this the best utilization of staff and resources to identify eligible students?
- In the section updating guidance for clarity, it references “conducting assessments for any parent or appropriate party who requests it”. Does this mean the LEA no longer has the option to turn down requests when inappropriate?
- What will the process be for selecting vendors and will LEAs have opportunity to submit for approval an outside vendor? And will districts have input on the selection process?
- How is it going to be determined that students need compensatory services if we tested them four years after they were tested before, but are not found to qualify. How far back do we go to provide compensatory education
- \$25M for comp services will not be enough to cover all districts in the state and how will the distribution of funds be determined? Will districts have input on allocations?
- Explaining the differences of programs to parents is good, and applying procedural safeguards at different levels is good, but the call center seems a waste of funds.
- Parents will be redirected to districts. Is there not a better use of funds than a call center?
- Stakeholder groups should have special education directors as part of the groups
- Templates developed by the 3rd party vendor can be done through ESCs
- Why are the lines between 504/IDEA being blurred ; how will these be funded?
- Will there be a TOT session for the "institute" for educators?
- Dyslexia
 - There was an "era" where LEAs moved students with dyslexia OUT of sped and into 504. Many states serve their dyslexia students as learning disabled within Sped. Is this the direction we are heading?
 - funds for 504 and dyslexia for ISDs
- Getting the staff development in where there is time and funds available.
- Professional Development:
 - This is a good idea. Concern is: will the state provide a power point? or will this be something that we have to implement with a day at district level? We need more information and money if it is at district level.
- Section 504 Eligibility
 - A student who is eligible for section 504 will always be eligible. The student may not need a current plan and may not require accommodations at this time, but the student is always eligible.
- Moving of dyslexia and 504 into the Special Education dept
- The corrective action plan itself is being interpreted as a "special education thing". However, when you read the plan one quickly sees that it is about special programs. I think this is necessary and we should be looking at how these programs work together. My concern centers around the special education staff/depts being held responsible for areas in which they have not had any part of. Perhaps this should be promoted more as a Special Programs plan?
- Staff Development
 - What is the timeline for completion of the proficiency test? What will the consequences be for not passing? Districts are struggling with finding teachers already. How will this test further impact this? The test needs to be easily accessible, with little to no travel involved. What will the additional cost be to LEAs?
- Will there be a statute of limitations on the evaluation requirement? How far will we have to go back?

- Financial Concern
 - There will be a substantial burden on school districts with the financial impact and with finding personnel to do the testing.
- What is reasonable growth under RTI? If it goes past the 6 month do we pull the RTI?
- Funding
 - More funding and training must be provided to support the increase in referral requests.
- Guidance
- Will there be guidance on what the most appropriate program is without violating Child Find? 504? RTI? Sped?
- Training
 - Personnel who are trained in Sped aren't necessarily equipped or have the expertise in Dyslexia, etc. The personnel will need more training. Additional personnel will also be needed for the increase in assessments.
- Plan
 - Will TEA be providing us with a plan?
- What was the actual approximate percentage that was discovered in the investigation that OSEP found districts were derelict in evaluating
- RTI and Child Find are in direct conflict of each other. How will TEA reconcile these two mandates as it pertains to students with suspected disabilities?
- RtI is not a process that can be mandated as it relies on the child's needs...so each district has different systems
- No federal outlines...so is Texas going to give outlines on the RtI program--to attempt to make it more consistent
- Will RTI be tracked and monitored at the state level?
- What training will be provided for staff on the difference between RtI, 504 and special education?
- Dyslexia teachers have not been completely trained to review normative data. How can we monitor who falls under the umbrella of dyslexia. Should we look to at the process more.
- How will students that DNQ be progressed monitored?
- Is TEA going to provide statewide RtI interventions that they pay for and LEAs determine which students need it.
- Cease from using the term State Dyslexia "Program". It is not a program, the handbook provides guidance, support and adheres to the laws and rules that guide and support districts in providing the proper identification, instruction/intervention. and support based on the individual need of the student. The term "program" indicates it is a "one size fits all", and it is not.
- The SLD definition is contradictory by definition based on the identification models supported by IDEA, specifically RTI
- RtI
 - The Fed Regulations REQUIRE RtI; however, Texas don't have a good system for this...
 - "Related disorders" in the current State Dyslexia handbook does not provide guidance on identification or services developed on scientifically based research.
- what does extensive stakeholder feedback look like?
- How will PD be distributed? Funded by LEAs?
- Will teachers receive stipends for the additional institutes?

- Why does SPED have to get the professional development? If this is all about Child Find it should be done with administrators and general ed teachers.
- The outcomes listed are tasks/resources; they are not outcomes
- There is no time frame for bullet 2
- Consistency of evaluation processes and programs used since there are no mandated outlines.
- Can LEAs customize the resources?
- Will PD be ongoing? When will it begin?
- Will Dyslexia teachers with CALT be considered having a SPED certification or will they have to get the additional certification?
- What additional guidance will we receive? Poor Services
- There are students in classrooms with ineffective tier one services
- How will the existing state guidance relate to the new suite of resources?
- If dyslexia is considered SLD under IDEA, why is it considered/treated as a "separate" disability in Texas?
- Does data say we need more call centers?
- What is the role of the regional service centers in this plan?
- LRE Number
 - The LRE numbers are about to majorly go up in 41 for ages 6- 21 if dyslexia is moved to SpEd.
- Will there be a 30 hour, and annual 6 hour refresher (like that for G/T), required training for all teachers for special education, 504 and Dyslexia? All teachers are teaching these students anyway.
- Have we researched how other states work with 504 students?
- If dyslexia put in sped, why is the dyslexia handbook being updated?
- Funding--where is it going to come from? The districts are already underfunded.
- Statewide PD for educators - include "all our kids" vs. these are not my kids (I didn't go to school to be a sped teacher).
- Training all teachers will be a time issue. How are they all going to come during the summer. Other academies do stipends???
- Is a call center the best use of funds FUNDING
- First of all, 504/Dyslexia NEEDS funding. It is currently unfunded, but we do it anyway. If Dyslexia is added to SPED, will we increase our funding?
- What does the terms delay and deny mean? Is RTI seen as a way to delay or deny? Making the meaning of the RTI process clear to everyone in the school district. Why is RTI used and implemented?
- We are already requiring so much training from our teachers that they can't get it all done now. And, we can't find enough subs to cover classes. And, teachers aren't being compensated enough to give up their summer time.
- 504, Dyslexia, Special Ed, RTI
 - We are constantly looking at what are areas of weakness to determine what services are needed. They are not all lumped together currently so why is it seen as us not providing services for someone with Dyslexia because they are not in special ed? We ARE providing services but not through special ed. We need clarification on whether or not they will stay separate or will be lumped together. There is a discrepancy between the OCEP letter and the Corrective Action Plan.

- Could we look at this differently?
- Who will be responsible for paying for the "suite of resources" for parents?
- The added requirement for training is a burden to teachers they are already required to do so much training as it is. As a district, we are always short of subs. Who will pay for the training and the subs at the district level?
- Financial Burden/Staffing
 - Who's going to encumber the financial burden of providing resources to parents, teachers and the community members?
- Staffing is AGAIN a concern in this area.
- Who is going to be required to attend trainings? Many staffing issues here.
- Call Center
 - Who's manning it? Will this be another component that disappears? Again, will the money allocated be enough to provide extensive support?
- Dyslexia
 - The isolation is a problem.
- Call Center
 - Purpose? What is the difference with this call center and SPEDTEX that is already in place? What are the possibilities of this becoming an advocacy group against LEAs and how will SSAs or LEAs be informed that a parent is unsatisfied.
- What will the PD look like?
- Will this be an accountability issue? Will this be a ESC responsibility? Does this turn the ESC into a regulatory entity.
- Dyslexia
 - Should dyslexia be considered under special ed like other states? Instead of being separate?
- Escalation Team
 - How will this be established? Very negative connotation using the vocabulary of Escalation & TARGET! Who determines this?
- Compensatory Funding
 - In CA 2 TEA references a compensatory services fund. The CAP also references private entities providing services. TEA should not prevent LEAs from accessing these funds and using the funds to provide needed compensatory services themselves.
- Kids you are helping vs. Suspected disability
- Technical assistance
 - What does this look like? Will TEA endorsed products trump the LEA chosen products?
- Rubric
 - What's the rubric for the negative special education report? BEWARE of the CUT points - that would repeat the 8.5% issue!
- Resource Development
 - So families can request interventions and services if they suspect a disability without going through the evaluation? I think the wording needs to be looked at in this section.
- Timeline arrows
 - Resources available in Fall 2019 but the next bullet says full implementation is by March 2019. Fall is after March....should it be Fall 2018?
- Appendix B

- Exploring changes to teacher certification and credentialing- what about current teachers?
- What is the PD? Why can't we provide our own? It is not a one size fits all training. What we do in rural Texas may not be the same as what is done in the metroplex. Does this mean that Dyslexia/504 will ALL be under SpEd? Will additional funding be provided for dyslexia and 504 included in SpEd?
- Are we understanding that non-SpEd services of dyslexia and 504 are going to be audited under SpEd per the CAP?
- Of course, professional development is needed. We will hear the same info that we have heard before~~just in a different package by the third agency.
- We need clear definitions of who falls into the "suspected" area. How do we train parents, and teachers to look for delays.
- WE need more clear guidance on the assessment and identification on Dyslexia?
- Suite of resources
 - What kind of resources are we talking about?
- Who will be revising the resources?
- Costs. Resources being spent on the third party looks like TEA is hiring someone else to get them out of trouble. What work will TEA be doing?
- What will the PD look like? And will it be targeted to the specific needs of the LEA's?
- Who will be providing ongoing follow-up?
- Seems like general ed needs to buy into this situation. Rti may or may not be place. RtI looks so different in every school.
- Dyslexia and related disorders is a huge area. We will need more clarification.
- What information must be disseminated to parents and how will that occur?
- Concern of the RFP going to a third party vendor.
- What are the state wide Professional Developments?
- Call center will be staffed enough to handle the frenzy that we are creating? Will people talk to people or digital answering machines.
- There is a need for a consistent RtI process is imperative.
- Why are we only revising the Dyslexia Handbook, what about the other handbooks.
- What does content proficiency look like?
- Inclusion isn't working. We need layers of SPED.
- How are we providing training's for new teachers- those with an Education degree and the Alt Certified teachers.
- Inclusion isn't working and isn't researched based.
- Identifying students is critical BUT then how do we serve these students. Schools seem to have a cookie cutter process for provision of services. This may conflict with the concept of INDIVIDUALIZED education and FAPE.
- Everyone has a different idea of what Inclusion looks like- but no one is doing a good job with it. How do we fix the mindset of teachers who just put the sped kid in the back of the room and ignore them throughout the class.

- What about the paraprofessionals that are in charge of inclusion?
- Our special education teachers sometimes don't even know what specialized services and supports we are offering.
- Who is the PD for, the instructors, the participants, or both?
- Dyslexia/504 Support
- One staff member designated to these programs is not enough.
- No Third Party
- We already have Region Support Centers with call centers, support opportunities, etc.
- Professional Development
 - The message should be consistent from ESC to ESC across the state.
- Call Center
 - The current call center is not well utilized. Why would we expand a resource that isn't working?
- Dyslexia Handbook Revision
- MUST consider a consistent funding mechanism to provide the actual services needed, not just evaluation.
- Funding
 - We have to fund evaluations AND the resulting intervention/support needed for each child.
- Professional Development
 - Student outcomes centered professional development must be a high priority for the agency, and delivered by our Region
- Support Centers
- CA Plan
 - It's all designed top down, and not providing support where it is needed, in districts and classrooms.
- Call Centers
 - Call Center at Region 10 currently isn't working, why expand it? What training would call center staff have? Would they be capable of supporting families speaking a variety of languages?
- Parents
 - Tone of parent training and resources a concern. Will parents be encouraged to attack districts
- Funding
 - There should be weighted funding for RTI/dyslexia/504 students. These students are not considered in Texas special ed counts, but are in other states. If we are going to be held accountable, required to document and provide additional services, then there should be some additional funding for these students.
- Third party
 - Why wouldn't TEA create these, since they will be supporting them?
- Dyslexia Handbook
 - Reworking this handbook could be highly impactful -- staff, evaluations, services, students
- Professional Development

- To keep adding topic after topic after topic to required pd, what are you taking away?
Districts do not have time to work on improving instruction due to the continuing addition of pd.
- \$0.15 million - dyslexia....
- At a LEA level, this will be a huge expense and finding appropriate/qualified staff for assessment and teaching --- huge concern for rural
- Need immediate technical assistance training in regards to dyslexia
- RtI
 - Need guidance and funding. If a child is making progress with RtI, why would we not continue to use something that works?
- Districts are not opposed to systemic change if supports and trainings are available from TEA to work with teachers and administrators to help students. We do not have the staff available to do the assessments that this plan will generate.
- If a student is making progress in one of these programs (dyslexia, etc.), we should not have to identify the student in special education.
- Dyslexia
 - Our SPED staff and diagnosticians will need to have training on dyslexia and dyslexia evaluations.
- Funding
 - Weighted funding needs to be looked at
 - Changes in dyslexia will require more evaluators and training which will cost money. Where will this come from?
- Define Adequate Progress
 - If utilizing RTI with a student or group of students, what standard of progress would suffice the student or group of students' need for progress. Meaning, he/she might not be on grade level, but is steadily moving that direction.
- Should dyslexia fall more under the special education umbrella, will there be additional funding for these students
- Will dyslexic students be identified as Special Education students!!
- Either / Or
- Don't move kids in and out of programs. Qualifying for SpEd through Dyslexia and moving to 504 once program completion is attained creates cracks to lose kids.
- More funding needs to be provided for mainstream students
- Statewide professional development institute for ALL educators in 504 and dyslexia? We already do this locally. Will the state provide the funding for ALL to attend this institute?
- Dyslexia is often the most appropriate place to start if a student struggles in reading. How is it determined that we denied a child an evaluation if we start with dyslexia.
- Concerned with TEA making decisions regarding dyslexia...
- when at this time they are implementing a K-2 dyslexia screener that does not take into individualized needs, prior learning, prior teaching, etc.
- Will dyslexia be under special ed. now? Call center
 - Is there really a point? The calls need to be directed to school districts and TEA provide the districts/service centers the support they need to answer questions. TEA

will NOT know specifics to the student to be able to help answer questions related to their child!

- Specific guidance on RTI process. Dyslexia is a neurological processing disorder at the phoneme level and should not be our first line of intervention in reading. Students who need help do not always need to qualify for a program.
- If dyslexia is considered special education is this something that we're willing to put a special label on for the rest of their life?
- Will funding resource be our current pot of Federal funds and, therefore, put a greater financial strain on districts to meet other needs?
- Additional funding for dyslexia.
- Professional Development
 - What will this look like? Who will put in on? Timeline for PD - summer, august, throughout the year? How will ALL teachers get this?
- Speakers of other languages that are dyslexic.
 - How does this impact ELL/LPAC services?
- There's no uniformity across Districts to identify dyslexia students.
- Professional Development
- Will a 'grandfathering' type of situation be used for the current teachers already certified and working in the districts?
- Students currently identified with dyslexia under Section 504, there's no funding to provide services for these students.
- The Texas Dyslexia Handbook does not provide clear guidance for assessment
- Barrier
 - ELL student assessments available are limited, and will be a challenge to reevaluate students who were just recently tested.
- Parent Information
 - Parents need to have access to information regarding 504, RtI, Dyslexia. How can we ensure parents are receiving that information consistently across the district?
- With the current budget issues our district is having and our assessment staff having extremely high caseloads, how are we
- supposed to conduct a valid screening or assessment with limited staff?
- Answer: give us the money
- Who will be able to participate in the PD? Everyone or a selected few from each district?
- What are the qualifications for dyslexia/504 support staff?
- The classification of dyslexia is still a barrier in special education.
- Cost of the call center diverting money to people on the field...more teams for support.
- Personnel
 - Will 1 person for dyslexia/504 be sufficient? How realistic will the assistance be from this individual.
- one time funding for resource development, there needs to be continual funding.
- Clear guidelines
 - TEA needs to be clear on providing resources for RTI. There also needs to be a clear line between RTI/SpEd/504/Dyslexia.
- What does "suite of resources" mean? Will TEA provide support to LEAs in this?

- What is the criteria for developing the Dyslexia Handbook to clarify difference?
- Is Texas putting Dyslexia back under the SpEd umbrella and if so, will there be funding?
- Dyslexia
 - Why is Dyslexia handbook not updated before the 1st grade screening and funding to provide the screenings.
- What does the statewide training model look like for the educator PD and when will that begin?
- What type of follow-up will occur with the PD? Are these online and will staff receive credit and/or pay for attending?
- Dyslexia
 - This should be under special ed umbrella
- Dyslexia label should be done away with and this should all fall under Reading Disability
- resources, funding ??
- prof dev ??
- Will this now be integrated into T-TESS? T- PESS?
- Is TEA going to revisit their own model for RtI?
- Clarify "delay assessment" when discussing RtI.
- other programs
 - It's a concern that all these programs will be by-passed and we will have to move straight to a special ed initial referral when the other programs could be beneficial for the student.
- Funding and including staff development days in the calendar will be difficult for districts to manage.
- Will TEA be disseminating information to staff and parents themselves? We are having a difficult time understanding the verbage of these plans as educational professionals, so how will parents understand?
- timeline ??
- Where will the statewide professional development going to occur? Funding for travel for those that live in faraway places
- How will TEA train all educators and provide ongoing follow up
- need paper alternative to online access for families
- When will resources mentioned be available? Who will provide training to all teachers? When will training occur? Who will pay for the training? Is the training ongoing? What about late hires? How will teachers demonstrate proficiency? I assume a test as that is the trend in TX - who will develop it? Who will pay for it? How often is a demonstration of proficiency required
- Director
- Our team agrees that this is a good idea. This should already be going on.
- The support for Dyslexia and 504 if a good step to help students.
- Revise the phrase of "parents of children suspected of having a disability"
- Determine if the information and resources would be provided by TEA versus the district. Also this suspicion of disability only address the parents and should address anyone that may suspect. Review the Child Find procedures.
- Establish a solid Plan 3
- Clarification is appropriate and needed for RTI/ dyslexia/ 504.
- How will you now serve those students who are "way behind for whatever reason"?

- Call center will just become a gripe against my district resource to parents.
- Don't have enough funding for the SE teachers we currently need - how will we afford more?
- Call Center
 - Can we see the analytics to support additional funding going towards a larger call center? If they don't exist or don't support needing more, can these funds be reallocated to LEAs?
- Call Center Knowledge
 - Will these individuals be knowledgeable about dyslexia and the various options of how it can be identified and served?
- Details regarding when and how districts will get TEA guidance on the differences and intersections of the different programs
- Concerns: Who will be responsible for compiling the information regarding the differentiation of the purposes of special education, Section 504 and RtI.
- Will Dyslexia now come under IDEA? The ramifications of that change are enormous in terms of funding, staffing, etc.
- Concern
 - Last week at TCASE, Ms Schwinn mentioned that moving forward we might see Dyslexia served through SpEd for some students, through 504 for others, and that some students with Dyslexia might not need specific services by the school district. Will the state set eligibility criteria for multiple service models for Dyslexia?
- Are we expecting that Dyslexia be moved under IDEA?
- Will we lose general education Dyslexia teacher's abilities to assess students for Dyslexia? Will these teachers be required to become special education certified?
- Concern
 - If dyslexia comes under IDEA now, will teachers who work with students have to be SpEd certified?
- Dissemination of resources to parents and districts will be an added support
- Again, programming and placement decisions are made by a knowledgeable committee. To articulate guidelines for placement and programming from the state level is misguided.
- Addition: Require training specific to special education for EVERY professional staff member, similar to the requirements for GT training that exist
- Addition: When the Dyslexia Handbook is updated, include the newly required screening for K and 1 so districts are not buying or creating their own. This would make it more standardized across the state and cost effective for districts.
- Idea: Consider putting dyslexia under special education, as it is in most states.
- Are they going to provide a definition for specially designed instruction vs differentiated instruction.
- There is already required training for general ed teachers to receive training i.e. working with students with Autism.
- How is this training going to help change the mind set that all students are general ed students and then special ed student

- I think that changing the teacher prep and makes all teachers take course work on general ed students, special ed students, disabilities, differentiated instruction. But this will take multiple years to see improvement in this area.
- What do we do with the current teachers.
- We provide staff development and solid staff development but our teachers are still not changing.
- So much is required of the general ed teacher...how can we help them...in smaller districts the resources are so limited

- but our students are the same in all districts but our resources are not the same. Our teachers are doing so much more, benchmarks, social skills teaching, etc. our level of poverty and lack of parental input...no fault to the parent because they just don't know either.
 - The dyslexia program needs to be taught to more people. Special education resource does not meet the definition of a multi-sensory approach.
 - More clarification on how you identify dyslexia.
-
- How will you determine enough progress and if they need to be referred.
 - Why isn't the 'content proficiency' stressed more in colleges and universities around the state? There is such a vast difference in rigor between larger and smaller universities, which results in rural districts (which pay less) attracting teachers from smaller universities that are not as prepared.
 - Are you looking at putting dyslexia under special education?
 - What is the criteria for students with dyslexia to be put in special education?
 - Will everyone have to take the training and pass the exam?
 - Consistent definitions of 504, Dyslexia and IDEA will be beneficial to all.
 - How is TEA going to provide clear guidelines for ensuring that supports are provided for struggling learners?
 - LEA's are currently providing notices to parents regarding services available to them in numerous ways.
 - Parents
 - When planning for the training for parents, TEA needs to stress that in order for a student to receive SPED services, there must be a need that can not be met in the general curriculum. Example: If a student is making A/B honor roll in all of her classes and E's/S's in conduct, yet has to take meds for AD/ADHD, there is no need for SPED services. Yes, parents will insist on services even in situations such as these...usually stating the student should make all A's and all E's.
 - Procedural Safeguards are given to parents each year. Sometimes multiply times per year.
 - Where will money come from to help train and education RTI, 504 and dyslexia staff
-
- Specially designed instruction by definition is adapting or modifying instruction by changing the content, methodology, or delivery of instruction to meet the individual, unique, needs of a student. (CA 3) The need for SDI indeed separates a 504 student from a special education student. LEAs seek additional clarification in identifying what is "specially designed" with instructional delivery in some settings. With increased access to powerful instructional technology; with a rise of complex student behaviors not related to IDEA-recognized diagnoses; with prevalent social challenges; and increased enrollments of ELLs we are to the point of "something special" for most; not the few! Adding to the confusion when attempting to limit "specially designed instruction" for just those in special education :Dyslexia services as a form of specially designed instruction based upon a reading condition. IF students with dyslexia receive pull out services, how is this not considered special education eligibility?
 - The TSBVI requesting counts on 504 students, as well as special education students, with visual impairments. Recent legislation allows the creation of general education behavior settings for students below the third grade.Non-IDEA-eligible students with serious behavior disorders such as Conduct Disorder could have behavior plans and multiple supports, similar to their Emotionally Disturbed classmates.
-
- The hiring of 3rd party vendors to create yet another "suite" of resources is NOT what LEAs need. LEAs need FUNDS to adequately address the needs of our students. How did SPEDX work out? Did that benefit LEAs and impact student outcome?
 - Funding and RTI students who have been in tier two for 6 months, but are showing continual improvement

- How will rural LEAs bare the burden of additional personnel required for Comp Ed, Dyslexia, SPED, etc... Will additional funds be provided for additional services?
- Will educators and district personnel have access to the call center?
- How will training for EVERY teacher be provided to the level that all teachers are determined competent? The content within the training on this action plan is extensive.
- The creation of another "institute" of training does not seem beneficial. What data supports that creating another set of training that is delivered outside of the LEA will have ANY impact on student outcome. Taking teachers out of the classroom repeatedly does not have a positive impact on students.
- Funding
 - The lack of funding of these comprehensive mandates will prove to be both an enormous barrier and concern. The additional testing required will put much burden on an already understaffed system, especially in rural, low se districts.
- Communication with Parents
 - Communication with Parents should come from the LEA. TEA should communicate with the LEA and the LEA with parents.
- Our 504 population has increased substantially over the last 10 years. We actually currently serve 9.9% of our students through special education and 12.5% through 504. Specially Designed Instruction is the component of the evaluation process that helps us determine if the student is served through a 504 plan or is placed in Special Education. Our district personnel will need to have a more clear of what constitutes SDI. Furthermore, school districts within our region are not consistent in determining which students are eligible for special ed. vs. 504 plans
- How will SPED, Dyslexia, and RtI work together to ensure that this is completed correctly
- How will dyslexia and related disabilities needs be represented in the plan
- Call Center
 - This is a unnecessary resource. TEA should communicate with LEAs and LEAs communicate with parents. The LEAs should always be the first level of contact for parents.
- Professional Development
 - Professional development should be provided through ESCs to ensure accessibility for all schools. Professional development costs should be fully covered by TEA and not by individual school districts.

Ideas or Solutions

- Funds need to allocated for RTI and 504 Program.
- The TEA should have a call center for LEAs to order and ship the needed material. The material at no cost.
- The LEA should also be able to access the material online, so that links are provided on the LEA websites for parents to access.
- Campus administrators and counselors should also be required to attend the professional development. Specify who the "others" are who will be trained.
- Professional Development
 - This is already a great part of the district's and their Child Find efforts as well as with training for all staff annually.
- Make sure that interventions are peer reviewed researched based and proper effect sizes with the appropriate population
- Need for compliance monitoring for RTI and 504 programs.
- Ensure opportunity for parental involvement in RTI and 504 programming.
- Require dis Define "Should have been referred"?
 - If a student made progress, then they should not have been referred.

- If a student is making progress, they don't need to be referred. They need to stay in the general education classroom.
 - Work more with the universities to encourage them to require more special education content and more rigor in the content that already exists in their education classes for teachers and administrators (general ed.)
 - Progress needs to be better defined as clarification is added to "should have been referred"
- Call Centers need a mechanism to provide feedback to the LEAs on concerns that come in.
- What is the recommendation of TEA for districts to take on the project between now and March 1, 2019?
- This guidance MUST be developed BEFORE the actions of #2 are mandated. And the professional development needs to be BEFORE #2.
- Rather than creating multi-levels of more compliance would funds not be better spent by providing evaluation staff, training, and support for Districts in need? LEAs receive plenty of non-compliance information, but never do they receive staff, training, or actual support to serve students. If students are not being served now, how are more audits, more paperwork going to serve students?
- The call center idea seems to be redundant - parents already have a system allowing for formal and informal complaints or reports of information.
- Call center - "TEA will include trends and "other interesting data" - is concerning; publishing comments collected without any district information will only stir up trouble and instigate anger. not an effective use of time or money
- Districts to have a lead 504/RTI coordinator that has assessment background.
- Dyslexia
 - Districts need additional funding to provide support to dyslexic students
- Counselors
 - Increased funding for counselors for districts on a number of students served basis? Or some other funding method?
- Parent and advocacy training.
- Grants for Dyslexia
 - Current grant provided for dyslexia has a short turnaround time. Plus, the form is expansive. Why can't districts receive funding for dyslexic students instead completing a time consuming and complicated grant form?
- Grants for Dyslexia
 - Will this include any funding for dyslexia and RTI at the district level?
 - Would like to see an RTI plan that is detailed and specific to help guide districts to better support our student
- Funding for compensatory services
 - Schools already go above and beyond to provide tutorials, summer school, ESY, and interventions to help students. The state will need to provide 100% funding for compensatory services that go above the services already provided to students. Attendance to such services must be mandatory if schools have to provide it and parents need to be held accountable if students do not attend.
- Call Center
 - Expanding the call center. How busy is the call center now? Are calls not able to be returned or managed? Is this simply additional expense? Parents are more likely to call someone

locally, local support for a Child Find hotline would appear to be more productive. Where is the data to support the additional expense of the expanded call center?

- The current call center is not utilized much in this area. Each of us as leaders in special education act as our own call center.
- Assessment staff - Have they explored the idea of training teachers in areas of achievement testing?
 - Could TEA work with TRS to adjust or temporarily lift the restrictions for retired teachers and assessment staff?!
 - Especially the new requirement that staff cannot return in the same role they left. Assessment professionals are highly trained and highly sought after, this is the only TRAINED pool we have available.
- If a student has already graduated on a regular plan, how will the determination be of specially designed instruction as part of the second prong for TEA eligibility be determined?
- If this plan does not follow IDEA criteria, then the timeline for evaluations will need to change
- What if the child has already been evaluated and DNQ'd?
- What does TEA mean in regards to establishing a relief fund to pay for some of the costs?
- Extend the evaluation timeline and provide funding for the staff
- Parameters need to be set such as is there another suspected need. This could help with the number of RTI students for 6 or more months
- Why is a section 504 plan now not adequate?
- As stated previously, state plans for 504 and RtI are needed.
- Significant money is being spent on professional development. How much of this will be provided online?
- Need to fund 504 and Dyslexia at district level.
- Clear Criteria and Guidelines
- We need clear guidelines for section 504, RTI, and dyslexia. IDEA is clear regarding eligibility for special education.
- How will training be provided?
- Teachers are already pulled in many directions and out of class for training. Can the guidance to ISD staff be done in webinars as an option?
- Flow chart for parent to review if student has a special ed disability versus struggling learner.
- Resources
 - Would it be possible to have a single location for all Resources produced, training, institute materials, etc. so that there is better ease of access for educators and those who support them?
 - Who will provide the professional development? What is the thought process behind a competency test after professional development?
- Is this going to be federal funding.
- Training
 - For the professional development for all educators please make it accessible in an online format as well as in person so that districts will have options as far as completion.
- Testing
- Many of our special education students cannot pass the STAAR test, but don't qualify to take the STAAR-A. We need to have something in the middle ground to allow our students to see their progress. What do they have to reach for if they know immediately when opening the STAAR that they are going to fail? Why would they even try?

- Delay in evaluation
 - TEA must determine that a delay in evaluation actually occurred in the LEA before requiring the LEA to make changes in their procedures.
- Grandfathering dyslexia specialists as spedcertified
- A better use of money would be people to help implement the changes that need to be made, not a call center.
- RtI and Dyslexia
- These programs provide great services for children. We fear these will be messed up for in this whole mess. These programs should not be changed.
- Provide more than one staff member for dyslexia and 504--the numbers are rising and the current plan only allows for one person to provide guidance, support and TA.
- Progress Monitoring Tool Progress MonitoringTool
- Perhaps TEA should provide a standard for progress monitoring so that all districts will use the same criteria.
- If dyslexia moves under the Sped umbrella, there needs to be additional funding to train our Sped teachers to serve the dyslexia students.
- The person assigned to 504/dyslexia needs to be a dyslexic specialist
- specific funds should be provided by the state for anything required that is above and beyond current requirements to accommodate for additional time, resources, and staff
- Immediate action on the revised Dyslexia handbook before all this testing begins within this outreach program---LEAs need it asap
- Add specific topics to the PD plan
- I have worked in other states and when I came to Texas I didn't understand why Dyslexia was not monitored under special education even though Dyslexia is a reading learning disability. Texas is the only state where Dyslexia has been carved out of the special education oversight, which, to me looks like that is problematic in the federal view of the numbers of students who are being found eligible as needing special education. Dyslexia instruction is absolutely 'specially designed instruction'. Texas should align with the rest of the country and put Dyslexia where it belongs. We should not defer to whether parents are not going to want their students in special education vs. 504 for us to make the decision about this. Putting Dyslexia under special education doesn't take away from providing research based specially designed instruction. Shouldn't we providing that whether they are special ed or not?
- Include dyslexia support in the PD plan
- Professional development should include all educators with a professional certification not just general educators, special educators. These trainings should be updated annually.
- State needs to give certain outlines for RtI if going to be held to a certain level
- Training
 - The general education teachers need to have REQUIRED hours of training in special education. All special education students are general education students first. There should be initial training and yearly training. JUST LIKE GT! Many of the
- special education students are in the general education setting the majority of the day.
- Dyslexia should be under the SpEd umbrella.
- what is statewide professional development for all educators?
- Training for teachers/administrators could be tied to certification.

- Dyslexia should not HAVE to be under the sped umbrella! They should get the intervention regardless of label or program
- Instead of a promotional campaign the money would be better spent on intervention based services
- district stakeholders should be a part of the statewide training development
- Gen Ed teachers need to be required to attend PD
- Less focus on program, more focus on individual student needs.
- TEA needs to create a resource directing districts to research based interventions for the various tiers
- We do a really good job of providing interventions and accommodations for students to be successful. What about helping districts with students in areas of social/emotional and attention needs?
- Districts need more resources to help these students be successful.
- general education teachers should also be trained
- SDI
 - It would be great if Specially Designed Instruction were more clearly defined.
- Ensure all stakeholders are included in the professional development activities, to extend to university training programs
- They need to do the same SPED requirement for training that they do for GT
- If dyslexia needs to remain separate for political reasons in Texas can it not be included in accountability numbers for clarity of services reasons?
- Professional Development
 - We are happy to see the proposal for a statewide professional development for all educators, however, it appears that special education is still totally responsible for the corrective action plan. I think general education needs to be a part of this corrective action plan.
- Resource Development
 - We recommend a high level of involvement from LEAs in the creation of these resources. This collaboration will increase trust between TEA and LEAs.
 - Visuals added to the resources will be important. Professional Development
- The professional development needed varies greatly across school districts--could school districts be given more control over the content ?
- RTI Definition
 - A clear definition of RTI and procedures for LEAs would be helpful to have statewide consistency.
- Dyslexia / SPED
- Combine the percentage of students identified in a school district with disabilities to include dyslexia.
 - Dyslexia as Sped Eligibility
- Dyslexia needs to be included under Special Education. We are providing Specially Designed to these Students - why shouldn't districts receive funding for these students? It is very difficult to explain to a parent that although their student has a significant learning disability, they often do not have a disability under Special Education in Texas.
- Dyslexia /SPED
- How do districts determine when a student receiving strong dyslexia supports under 504 should be referred to special education?
- dyslexia

- Make it fall under special education.
- Professional development
 - Create a trainer of trainers model not just a professional development packet. This will ensure consistency and expand availability to do timely training.
- Clarify for all stakeholders that RTI, Dyslexia, Section 504, and SPED are not exclusive of one another. You can have a foot in each camp.
- Pre-Service Program
 - The state needs to re-evaluate pre-service training to include knowledge of disabilities and the impact each one has on education
- PD Teachers and Staff
 - The training for staff should include RtI systems and supports . Teachers should be educated on providing targeted interventions in their classrooms prior to pulling students from classrooms.
- Increased funding for RTI and interventionists on campus support for districts
- TEA could provide access to a LEGAL call center for districts to ask for legal advice on Sped/RTI/Dyslexia related issues.
- Call Center Monitoring
 - Call centers should include collaboration with LEAs to ensure accurate information is being relayed before providing guidance to parents. A monitoring system should be in place to ensure advice is accurate, in line with local policy, and reasonable.
- There needs to be a clear model framework of forms that assist the LEA in the areas of Dyslexia, 504, and RtI; that way there are clear cut guidelines for what is expected. Will there be some type of assessment for proficiency for child find practices under RtI, Dyslexia.
- Possibly a monitoring system for RtI, Dyslexia and 504.
- Instead of training all teachers on child find they should be training all teachers on Universal Design learning. This would be a better way to reach all children and make a change in the classrooms to impact learning and students with learning differences no matter what category they are qualified under.
- Instead of all the new positions at TEA...use the funding directly on the districts that need the most help...creating more jobs at TEA is not a solution...put the money in the schools...
- Section 504 and IDEA cannot be changed by the State. So, the State needs to make sure the State RTI and Dyslexia programs don't contradict and overlap what 504 and IDEA require at the Federal level.
- The understanding and mindset of the implementation of RTI, 504, and dyslexia.
- Will need to come up with a delivery format to make receiving the training more accessible.
- Revision of Dyslexia Handbook
 - Needs to be clearer, why can't Dyslexia go under special education?
- Handbook
 - Why can't we have an all encompassing handbook? Divided into sections - Gen Ed w/accommodations, RtI, 504, Special Education, - would be easier for parents!
- Evaluation Generate Program
 - Why can't the evaluation lead to program placement vs. program leading to evaluation. Keeping kids in LRE
- Call Center

- Why can't we use regional call centers? Who can call the call center? What information will be provided? What purpose? Will the districts be informed of calls to allow for follow up?
- The training needs to be accessible online.
- Desk Monitoring
 - This can include all the information being requested to add to what we are already doing - save on the COST! It would also be more valuable if we run the numbers ourselves.
- Prior to auditing or monitoring, a process of RTI progress monitoring, research- based instruments for measurement, and implications for initiating SpEd testing should be spelled out. Many LEAs have personnel in place for RTI at this time.
- Students making sufficient progress should continue in the RTI pathway. Students should be progressing through or out of RTI - not housed. Students who "stall out" or make inadequate progress should be considered for testing.
- Fund and educate LEAs on how to run this process rather than fund outside or centralized sources.
- Will dyslexia be considered as the 14th eligibility as a disability?
- Additional funding for LEAs dyslexia support.
- Provide dyslexia programs for all populations.
- Who is doing the Texas Handbook for Dyslexia? This will certainly be a way to increase numbers but may not be in the best interest of students.
- We need to develop a multi- academic criteria to decide if students are struggling. (attendance, daily work,) Not simply reply on state test scores for RTI evals ect.
- Everyone needs to be at the table: SpEd/504/Dyslexia/RTI personnel. In small districts our teams look totally different. Pulling the out of class to meet together is a challenge.
- Specific PD/ resources specifically stating what is special ed/ 504/ RTI?
- Include ESL in training
- Provide additional training for teachers to focus on dyslexia early warning signs. Specifically focusing on K-2nd grade.
- Ensure that adequate funding is provided to all LEA's in order to train their staff and provide ongoing follow up.
- We need to go back to structured routine trainings.
- Stability!!
- Make sure that Districts of Innovation cannot opt of out the statewide PD opportunities.
- Teachers receive the training- but how do we get them the resources to implement the training's.
- Professional Development Models need to change. One-shot workshops do not work. We need to coach and support more often than every six years at the LOCAL level.
- Districts will have to receive additional funding.
- will current budgets be affected ?
- TEA needs to provide clear definitions of Rti, 504 and IDEA for LEAs to distribute to parents.
- all this requires more personnel ! already have limited budgets.
- responsibilities of general ed with regard to RTI fidelity
- Consistent Funding Mechanism
- When you revise the dyslexia handbook, you have to also revise the funding mechanism to ensure specialized supports will be available/funded consistently.
- ProfessionalDevelopment

- Provide online modules to ensure consistency.
- We don't need a third party vendor for PD. We have 20 service centers who already do this work. The evaluation network along with the progress in the general curriculum network could do this work without it costing money that will be needed for services to children!
- Student outcome focused (not about evaluation/testing) developed and implemented at Region level.
- Provided at Regional Service Centers -- examples about students, situational, etc. -- Guidance, coaching, best practices
- Need more than a one time training -- needs to be ongoing and evolve with specific student examples
- Professional Development
 - Perhaps the PD requirement can be filtered from state level, to region, to ISD's to assist LEA's in training staff
- Dyslexia
 - Dyslexia should fall under Special Ed. like the majority of other states. Why do we continue to contradict Federal Law?
- Dyslexia Handbook
 - Dyslexia should not be an elitist disability. It is a reading disability and should be served under Special Ed. There is no need for a separate Dyslexia handbook.
- Assess all students suspected for dyslexia under Special Education.
- Identify dyslexia as handicapping condition in Texas instead of under SLD..
- We agree with your assessment
- Provide funding to School Districts to hire a dyslexia Evaluator.
- Special Programs
 - Provide parents information on 504, RtI, Dyslexia and contact information at the beginning of the year. Contacts need to be knowledgeable and consistent at campus and district level.
- Needs to be very specific on RtI , 504, Special Education and Dyslexia. Have this information prepared before the LEAs are to create their action plan.
- Look at putting the call center staff back to service centers to support the districts.
- Allow the service centers to create the professional institute for teachers. The service centers know the needs of their district and how to create productive staff development for teachers.
- Requirement that all staff including general education and administrators at the LEA be completed in the beginning of the school year. This should happen so all members are on the same page and receive the information formally.
- Dyslexia & 504/SPED
 - Clear guidance on when to go down each pathway.
- Assign the focus to teacher and school personnel training and resources versus current top bullet of parent resources.
- Tracking system
 - How will teachers attendance in the mandated training be monitored? By the state or district?
- Expand the current base information disseminated in the Child Find brochure to include some examples.
- Expand in the Child Find information, more information on developmental milestones. Might be done in conjunction with parent classes coordinated through pediatricians.

- PD for Administrators
 - Currently campus administrators are not knowledgeable about 504 & Special Education. They had a moderate
- understanding that is over-shadowed by the need to master "the TEST" and only see these programs as away to increase test success. they do not understand that these programs if provided effectively will increase student performance. On campuses I often see the special education or 504 teachers being used as 'substitutes' to save money. Administrators need to understand that these teachers are important and valuable to their students' success.
- Standardize and improve the RtI criterion and standards for what is appropriate progress in RtI versus not sufficient progress.
- State to provide resources to districts for progress monitoring and data collection that are free to the districts.
- Leadership academy to train campus and district leadership on refining the RtI model.
- Leadership training during staff development.
- TEA should visit districts and provide training.
- Administrator PD
 - Require administrators to undergo yearly training on Child Find duties and special education due process for discipline, MRE, and implementation of the IEP as written.
 - Administrators must understand that they are responsible for being knowledgeable about these areas and are accountable for ensuring implementation
- Parents
 - Having been in several positions in districts over my 28 years, Parent Involvement has always been the most difficult area to improve. The parents who most needed to be there for their student, we could not get to come. How does TEA intend to train and support LEA's on improvement of Parent Involvement and how does TEA plan on getting Parent Involvement at their own meetings?
- Student Success
 - RTI students who have been in tier two for 6 months, but are showing continual improvement and closing the gap should not be mandated to test as a whole. Students should be assessed on an individual basis and no cookie cutter solution will solve all problems, but in fact will create more.
- 504 should be a PRIORITY and not buried in this plan. TEA has NOT provided adequate information to LEAs to address this federal program. The resources in this plan should be placed BEFORE the monitoring takes place.
- Provide some of the funding to the Regional Service Centers to hire professionals that can provide assistance to the LEAs in classrooms and with parents. Teachers need modeling and
- Programs
 - A resource defining the differences between RTI, Dyslexia Programs, 504, and Special Education would be beneficial for LEA's to have, and LEA's to communicate with parents.
- Include Dyslexia, CompEd, 504, and RtI in this plan as much as the SPED is being involved.

Anything Else?

- Call Centers
 - This is a crazy thought. With all the support that districts and advocacy groups already provide, how will someone who doesn't know the children and their specific needs be able to guide the parents with respect to the special education process. This is already available in our own districts in face- to-face meetings.

- Dyslexia/504 support
 - This should have occurred along time ago, but with the current separation at TEA Special Ed Division, even this agency had this separation and now we're all being faulted for not having cohesive programs? Proud to say that some districts have all of these programs under the same director/leader.
- Professional Development
 - All newly certified teachers, diags, adm., etc. should be required to have a course on the program differentiation as part of their program requirements.
- Dysgraphia
 - What about supports for dysgraphia? Assessment tools? Training?
- RtI
 - It seems RtI has become all about filling out forms and checking off boxes
- Dyslexia
 - Need specific interventions to address "and related disorders".
- Dyslexia Handbook
 - When will this be ready?
- Just pay us, we are doing a fine job already. We already meet our Child Find obligations and have outreach plans.
- Unfunded mandate - the postage alone for providing information is steep even for small districts.
- This will lead to over identifying.
- Compensatory Service is a precedent for districts having to deny failure to identify and will lead to more due process. The criteria is not clear to identify.
- The state mandatory testing for special ed. children should be eliminated.
- Child Find advertising
 - As a District we feel that we do a good job advertising for child find or "finding" children with suspicions of a disability. Having TEA come in and add additional advertisement seems to be "overkill". It is already a legal requirement.
- Parent involvement
 - Parents need to be more involved in what is going on in their child's education. TEA needs to focus on parents taking care of their children and making sure they do their homework, read and are actively engaged in their own education. Schools have resources available and are willing to help, but parents are not held responsible for upholding their part in their child's education.
- Language
 - Language of the document makes RtI, 504 and Dyslexia supports inferior to the support of Special Education. If the programming is working and students are working in their LRE, why is more assessment needed?
- Smaller districts are already contracting with outside assessment staff to get these needs taken care of, how LEAs be able to fiscally respond (in a timely manner) to meet the CAP requirements?
- TEA was cited for failure to serve students versus districts being cited, why is the cost of identifying and assessing these students the
- When will guidelines be put into place for assessing students at parent request?
- Cost??

- "Some of the cost" of compensatory services will be provided by TEA for the entire state.
- What is meant by students in 'RtI' is this students in Tier I, II, or III?
- ISD should be changed to LEA. There are too many other types of districts.
- How will contracted vendors even be selected?
- This is going to be like Hunger Games among districts to secure assessment personnel
- Professional Development
 - I really like the idea of institutes for ALL teachers regarding inclusive practices, instructional techniques and child find. I would suggest extensive training in the difference between differentiated instruction and specially designed instruction with special education. Teachers do not understand the difference in order to make recommendations for special ed. evaluation.
- Are we defining or blurring the lines between the programs?
- Blurring the Lines
 - It seems we are lumping section 504, RTI, and dyslexia all under special education. This will be very confusing to parents. Special education should always be the very last resort.
- How will the professional development be accomplished? How will this be monitored after the PD is completed?
- PD for new educators
 - What is the plan for training pre-service teachers? How can this be implemented at the collegiate level in order to prepare teachers appropriately?
- Will TEA insure that the RFP be based in Texas? Will districts have input into the selection of the RFP?
- Looking at the plan now - there is going to have to be some common sense applied. Districts cannot do what you are asking right now. Completely overwhelming.
- The survey window should be opened again for additional input after the revision.
- The three points from the Feds were identification, services, monitoring...We have gone way overboard on our responses. We should go back to what they want.
- TEA will release an RFP specific to the creation of a suite of resources intended to be shared with the parents of children suspected of having a disability. How is this different from the Notice of Procedural Safeguards and Parent's Guide to the Admission, Review, and Dismissal Process?
- Student Successful
 - If a student is successful, would districts be required to test?
- RtI
 - What Tier(s) of RtI will be considered for reporting 6 plus months?
- Build instructional capacity and differentiation of general ed teachers somehow. ALL teachers need to be equipped to effectively teach ALL students.
- Clarify who will be able to do certain things - (who can teach dyslexia program? will this be inclusive of special education teachers now?)
- clear guidelines proactively
- Don't second guess the professionals working with the student daily when there are no set guidelines to follow. We make decisions on what is best for the children and then are crucified by media and politicians after the fact.
- OTs will become more necessary - with dyslexia increasing due to dysgraphia concerns. OT staff limited now in rural areas already.

- Funding
 - LEA budgets are cut every year and yet there are more mandates every year. At some point we must have more money to provide all of the services. Fund 504...dyslexia...RTI.
- PD
 - Could the PD be inclusive of strategies to help ALL learners? Special ed is important, but so is ELL, basic great teaching strategies for solid Tier 1 instruction. PD should be more inclusive not just focus on ONE thing.
- Homeschool
 - LEAs have no control over parents who choose homeschooling for their students and then return them to public school.
- Dyslexia support at TE
 - The dyslexia support person needs to actually be certified in dyslexia therapy and has experience actually working with students w/ dyslexia.
- It is good that general educators must also be trained.
- positive note: clarifying dyslexia and dyslexia-related services
- Be aware that the message is mixed - training on RtI but do not delay evaluations for special education.
- What will the PD entail and will be applicable to day to day instruction in classrooms?
- Handbook
 - It is great that the Dyslexia Handbook is being updated!
- What assistance/support is being given to improve tier 1 instruction for ALL districts, not just high need ones?
- Accountability
 - These kids are general education kids first. This is a general education issue, not a special education issue. It SHOULD be a small part of the population that requires SDI and special education services.
 - Ditto to the accountability comment.
- Resources
 - What will the resources in Corrective Action Plan 3 look like in reference RTI, the State dyslexia program, Section 504, and IDEA.
- RTI
 - Redefine the RTI regulations for the state. Needs to be uniform. Specific programmatic guidance is needed.
- Dyslexia / SPED
 - Can the state combine percentage of students identified in a school district with disabilities to include dyslexia?
- call concern
 - It's concerning that a state level call center might give advice to a parent without hearing both sides of the situation. Clearly there are 2 sides to every concern.
- Profession development
 - It states it will be developed. Who will do training? The districts given the created training? How will you ensure consistency among trainers as well as tracking the training has occurred in all areas (sped, gened,others)?
- Staff development

- How will this be supported. Paid time? Already have many PDs that are required, this is just one more.
 - What is the content of the professional development and how will it impact students? And cost?
- We have concerns that dyslexia is being viewed in isolation and there needs to be a hierarchy of when to refer to special education.
- How will the districts be trained to provide the PD?
- General Education
 - Where is the accountability for Tier 1 instruction a general education issue and NOT just lack of identification?
- Training Institute
 - When will this PD occur? Where will it occur? How much will this cost LEAs in terms of staff/instructional time/travel expenses, etc. Is this an online training? Do we add this to mental health/TTESS/child abuse/Dyslexia/many other required trainings that teachers must complete?? What does the demonstration of proficiency in this training look like?
- Dyslexia funding
 - Why do dyslexic programs even exist if we are unable as professionals to discern the least restrictive environment as an option. Shouldn't dyslexia fall under special education?
 - Districts use different qualifiers for dyslexia, so as they move they may not qualify in another district. it is inconsistent.
- Concern: How will this differ from other parent-oriented resources that are now available? How will stakeholders be included in the development of this system? Funding is always a concern. Logistics of the PD component is a concern.
- Teacher Shortage
 - We have a hard enough time finding teachers. Asking every teacher to participate in an institute for understanding Special Ed will further impact this. Also, participating and obtaining a certificate doesn't equal implementation of strategies.
- call center
 - will this call center provide advice to districts as well??
- At the national level, school psychologists are trained that dyslexia is a learning disability in "basic reading".
- Dyslexia included with SPED
 - If we included our dyslexia students with our SPED students, our percentage would be 16% vs. 11.5%.
- Where is the funding coming from
- What is the timeline of implementation after corrective action plan is completed? Considering Texas State Board needs to be a part of revising the Dyslexia Handbook, PD will be offered to entire staff, etc?
- Dyslexia-Related Disabilities
 - Are there going to be clear guidelines created to identify how a student meets eligibility for the dyslexia-related disabilities?
- Dyslexia Handbook revision
 - YEAH!
- Dyslexia

- Good that a staff member is being added for technical assistance in dyslexia and 504.
- Dyslexia Handbook
 - We like the revision of the dyslexia handbook to improve the clarity of guidance in the field.
 - Clarity is good
 - We are happy with clarity in the Dyslexia Handbook.
- Professional Development
 - Any mandated Special Development interferes with TTESS and the decision of professional development is most needed.
 - Please don't mandate every certified teacher. It should be handled in house.
- Dyslexia
 - There is not clear guidance. What guidance is Texas going to give us?
 - It is a learning disability under Federal Law.
 - 80% of families
 - How will this be measured? Umm - interesting!
- Dyslexia
 - Under the federal rules, dyslexia is under the special education umbrella. Why not include them in Texas and erase the line of confusion for LEAs and parents.
- Researched based interventions must be monitored in the general education classrooms. Provide us the resources, time, and support to learn how to collaborate and increase EVERYONE's skills.
- Dyslexia could be under the special education umbrella so that the students are served as a student with dyslexia/learning disability
- When the handbook is revised it needs to be done by knowledgeable experts.
- We need better trained community agencies (medical, mental health, etc.) and more communication with them being part of our teams.
- We need Handbook Cliff Notes or programs that help parents understand the handbooks.
- Higher education needs to be trained about what realistically they will be responsible for as an educator. Explicit instruction on how to teach reading should be required
- By all educators.
- All SPED and dyslexia teachers should be extensively trained on teaching students how to read.
- Professional Development
 - MUST be focused on student outcomes and how to serve kids, not just how to identify them.
- Dyslexia/IDEA/504/RTI Monitoring
 - What does this look like? DEC took 3-4 days with big teams to get done.
- Call Center Training
 - How will the call center staff be trained? Language availability???
- We definitely support the plan for professional development.
- RtI is available for all children. Just because a student is in RtI for more than 6 months does not mean that they have an educational need for SPED. Some students are working at capacity and are being successful, why make a blanket approach that 6 months plus RtI should trigger a SPED referral. Individually based...and isn't that what the whole intent of IDEA actually is....
- If a district has moved to the concept that RTI is about LEARNING the content and NOT a way to get to SPED! Otherwise it becomes a hoop again.

- Professional Development
 - Is this going to be a certification requirement, through SBEC, or will it just involve additional professional development at the district level?
- I am very excited that LEAs will have clear guidelines and resources describing the differences in RtI, Dyslexia, Section 504 and IDEA. Will the professional development be required and how will districts monitor the PD?
- What is the reason that the state is very conservative for employing 1 staff and 1 staff member?
- TEA RTI/MTSS Team
- TEA should consider using some staff funding to hire an RTI/MTSS team to address the popular misconceptions that lead to poor practices in supporting students.
- Professional Development
 - Special Education teacher certification should include a number of required hours yearly for those who need CE's in order to renew their certification. In these required hours should be specific topics/courses that must be taken and then some hours that teachers could choose such as reading or behavior intervention where there is a large need statewide but varying capacity within each district to provide.
 - Need to revisit Reading Intervention, since so many of our secondary students are not demonstrating proficiency in reading skills needed at High School. Current HS students are the product of our current reading intervention programs... What is wrong with that picture
 - The best of the correctives in place because the burden is placed on TEA rather than LEAs. TEA provided the initial cap and not the LEAs. This portion of the plan shows TEA is taking steps to provide LEAs support
 - Positives The following elements are positive additions and will greatly benefit the entire education program:
 - resource development for parents and educators
 - revised Dyslexia Handbook
 - clarification for all stakeholders about the differences between SpEd, RtI, dyslexia, & 504
 - professional development for educators, particularly general educators
 - additional 504 guidance
- Thank you TEA for offering the template creation of resources
- What is the definition of progress in RTi?
- Are we considering the rate students may be making progress? Not all students will or can make progress at the same rate. It can be effected by numerous factors including environmental/situational/ ability levels. All of which are important to take into account
- What happened to trying to provide services through RTI, 504, dyslexia in order to keep students from having a disability eligibility. I thought that our mandate was LRE.
- How can RtI progress monitoring be aligned in all districts allowing for consistency?
- Have you considered how different this will look from one campus to another? One campus may only have a 100 kids that need an RTI or 504 where another campus in same district may have 450. Are you going to take that into consideration and offer support staff funded by TEA for those high need campuses?
- The state needs to work on redefining dyslexia and moving it back under Special Education
- Need to clarify the definition on Specially Designed Instruction.

- Who is going to be providing the statewide training for teachers? What does the demonstration of content proficiency look like and who determines that?
- The timelines are overly ambitious
- The 8.5 issue has its roots in state testing dating back to 2004. One year is not enough to address the root issues: when should an LEA suspect a disability that requires "specially designed instruction". Commissioner's Rules that require interventions BEFORE special ed must be changed and clear guidelines developed on when is an LEA to suspect a disability.
- What so Magic about special ed?
- The call centers are concerning. What is the experience level of the people answering calls.
- Why not use the call centers to help parents and teachers learn more about helping the student learn. Maybe we should spend more time and money actually helping the student that needs help!!

Corrective Action 4 Responses

Barriers or Concerns

- Self-correction opportunity
 - will ISD's be provided with ample time to self-correct before being referred to SpED Escalation Team
 - When are we going to address the quality of instruction in the classroom?
- Escalation Team
 - If deemed appropriate, will the Escalation Team be assigned like a TAP? Working specifically and exclusively with districts....for how long? What evidence of improvement will be required.
 - escalation team....
 - what is TEA basing their identification of “negative SpEd monitoring report” as the basis for determining districts who will require “Escalation Teams”?
 - Will additional funding be provided to smaller ISD's before hand to allow for more assistance at the front-line of referrals, evaluations and services?
- Considering the challenges faced by LEAs with funding the need for technical assistance, how will LEAs be able to afford a third party technical assistance?
- Special Education Monitoring Report
 - What will this measure?
- In previous experiences in working with corrective action plans from TEA, there has been a lack of consistency in guidance and response. How is this going to be improved once Escalation Teams are receiving "assistance".
- "Escalation Team" is a very poor name. Like the idea -- NOT the name.
- Does the reference to ETeams spending considerable time in district imply that we are moving from Monitors to Monitor Teams?
- How will we ensure continuity between the variety of 3rd party technical assistance providers? Having worked on a federal grant before, this can be a challenge.
- Corrective action
 - Who is on the SPED escalation team? What are the guidelines for not receiving a negative report? Actual data versus a disgruntled parent? What type of technical assistance is offered?
 - What are considered high needs for the school improvement plan? Who makes that determination?
 - What is the technical assistance determination? How often are they available? At what cost?
 - What is the timeline for finding providers? How realistic is that given the huge needs for rural areas already? What is the timeline for this?
- what would desk AUDIT look like?
 - I think 6 years is too long - I think visits need to be more frequent. If STAAR scores are reviewed yearly - and we try to ensure they get better annually - I think the same should be for district visits.
- What will happen toPBMAS?
- Will third party be knowledgeable of special ed?
 - Will PBMAS continue or will this take the place of the PBMAS monitoring visits?
- Will there be funds available to have teams at district level
- What support will the Escalation Team provide
- Escalation Team - this system seems to set Sped back a decade. We are finally part of the CIA team and part of school- wide systems. According to this plan we will now have our own monitoring activities isolating us from General ed.

- The two monitoring systems i.e. school improvement and Sped monitoring are another example of more red-tape and paperwork being added and nothing being taken away. More time for paperwork and monitoring and less time for direct student services.
- 46 FTE's added to support compliance seems excessive. This money could be better used to support the evaluation efforts that appear to be the focus of this plan.
- Who will triage? What will their qualifications be? What supports will they provide?
- What is meant by "school districts that have special needs"?
- What data is TEA referencing to make this determination?
 - Low SpEd identification Low Dyslexia identification Child Find violations PBMAS issues
 - How do you get on or stay off the escalation list for visits?
- Clear guidelines for these programs and eligibility criteria need to be provided to the LEAs. Time for implementation of those guidelines within LEAs needs to be considered before anyone comes out and monitors programs that are inconsistent across the state at this time.
- Money could be better spent on providing needed services to students versus TEA Escalation teams that are going to cost 285 thousand the first year.
- Escalation team would create more positions away from the student.
 - Once again....third party providers.....
- Will the escalation teams be regional for consistency
- What type of training will these teams receive and will they use a monitoring rubric for consistency
- What does districts who have "special needs" mean?
- What data is TEA using to make this determination?
- What will the qualifications of the escalation team be? What data elements will trigger an escalation?
- Will these technical assistance providers have a special education background or will they be like the SOAH hearing officers?
- More funding in this corrective action plan will divert even more funding away for the people who need it the most - the kids.
- How will third-parties be chosen/selected? Will the special ed escalation team be more site based or TEA based? Districts need more support locally and not more people centralized in Austin.
- What evaluation will be done regarding finding the 'missed' students to ensure the district is meeting expectations?
- Outside Vendors
 - Why use outside vendors and not ESCs?
- Define "specific need"
- TEA Escalation Team - the name alone creates a sense of anxiety.
- Escalation team - agree with the name creates anxiety
 - Define specific needs for support?
- ISDs funding and cost are not aligned
- This sounds like the DEC teams we use to have???
- What determines a "negative special education report?"
 - The escalation team will come provide intensive intervention, but we need to know what constitutes a negative report?
- Use the ESC's instead of third party vendors
- Define "negative monitoring report" - criteria for this needs to be developed
- Define "intensive technical support"
- 3rd party technical assistance providers is a concern
- TEA negotiates pricing, but the district has to provide funding "Escalation team" verbage is concerning
- Criteria for the gap between students who are identified and those who should have been identified.
- Strong Language

- The term "Escalation Team" invokes a visual of a SWAT team swooping in on a campus! Please consider a different name!
- ISDs
- What does the SPED Escalation Team look like? SPED Directors or someone knowledgeable in the area of SPED.)
- Criteria for Escalation Team visits
 - One consideration when looking at data to choose the districts that will receive these first visits....in our SSA...we have "centralized programs". Students unenroll from their home district and enroll in the host district. Therefore, several of the outlying districts appear to have much lower sped representation.
- Region Centers as a resource
 - Throughout the entire document, local region centers are not ever mentioned as a resource or a vendor. With additional funding, I feel that many elements of this corrective action plan could be facilitated by local ESCs. This would give LEAs support from local people with education experience instead of outside third party vendors who may have little education experience.
- The state plan should be focused.
 - The state knows the districts who are in the greatest need of technical assistance and they should be the focus of the plan.
- What determines identification gaps?
 - How does this effect district's that lost documentation due to Hurricane Harvey?
- "Intensive Technical Assistance"
 - What does this look like? What is the timeline for how long this would last? "Until the Escalation Team is in place" - sounds like districts could be left to figure it out on their own and left spinning their wheels with little guidance.
- Whatever plan we have needs to ensure that our students don't fall into a hole of special education and can't get out.
- It is important to make steps so that our students are not trapped in special education, but can advance out of the system eventually.
- Monitoring
 - Is the escalation team different than the audit team? Will these individuals be thoroughly trained. What is the report going to look like? Is the special education monitoring report the same as the PBMAS report and what specific items are going to be monitored? Since the 8.5% was removed what will constitute a referral to the escalation team?
- Funding
 - Those LEAs that are referred to escalation, will there be additional funds provided above and beyond what others are receiving?
- How will the gap between students who are identified and those who should have been identified be determined?
- What is an escalation team??? Who will be in it and what will be their criteria?
- Who is paying for all of these teams? Where will the funding come from?
- reconsider the name Escalation Team
- There is concern about resources being given to third parties
- Why is money being set away from the schools and to a contracted group
- The name "Escalation Team" has a very very negative sound. Why can it not be a technical support team?
- What exactly is an escalation team? Is it rationalized or will it be statewide?
- Isn't there are more appropriate names than 'escalation team'?
- What is the "annual monitoring report?"
- Why not call it a "Support Team" Escalation Team sounds negative

- This is heavy on the compliance side with limited support on the instructional side
- What will the team be auditing and they need to consider the quality of the dyslexia team and the services that are being provided. We have CALTs in the district and they are providing quality evaluations and interventions
- Who will be a part of the "Escalation Team"? What are the qualifications? Who will it include? It should be a balanced group containing a multidisciplinary team, the concern is we will miss this opportunity to be collaborative.
- Again, how will districts know if they are 'high needs'? What will be the factors in determining that?
- Understanding that educators typically work to do what is best for student learning, will the team truly provide assistance or will this be a punitive process?
- What happens before you go to the Escalation Team. Are you given an opportunity to correct what is wrong. Could you work with your ESC on areas of concern from the audit before it goes to the Escalation Team. Maybe a similar situation to the TAIS process.
- ditto escalation verbiage reconsideration What will 'technical assistance' look like?
- Are public charter schools held to these same corrective actions? Will they be required to do these same child-find activities?
- How will the 'third party providers' be vetted?
- How will they determine the provision of projected federal funds that do not reflect the newly identified learners.
- Money
 - Where is all the money coming from to meet the requirements? We are already significantly under funded.
- When the state legislature put the dyslexia identification system into place it was a direct violation of federal guidance
- Escalation Team
 - What are the requirements for this? What is the education? What is the training? Will they really be qualified? What happens if the escalation team finds they cannot help the district?
- Are the third party provider contracts going to be annually and automatically renewed such that we do not run into the same situation as we did with SSI intervention program providers?
- TEA should ensure that the review teams are not seen as punitive but truly collaborated and done in an effort to assist LEAs which further helps students. Maybe consider renaming the team as its name bears a negative connotation
- This corrective action plan is based on 12 districts in the state. How is that sample considered a significant representation of the state of Texas? This is not statistically significant as the margin of error with a 95% confidence interval is 28.16.
- Will mobility and economically disadvantaged be considered in determining if you will be a monitored school?
- Third-Party
 - How will this be funded? What are the requirements?
- Who are the members who will fill these positions? Are they people who understand evaluations, ethical standards of an evaluator and disability determination.
 - If LEAs are identified as "high needs," they should get support from the Team first.
- Blame...
 - It is highly unfortunate that this is falling on the LEAs... The LEAs were attempting to comply with the mandates set forth by the USDE and TEA. Once again, however, the blame is shifted wrongly to the LEAs
- Who is the third party? What are the qualifications?
 - Who is third party going to benefit? This sounds like there are political gains in this process.
- How will TEA respond to all of the upcoming lawsuits that could occur as a result of this?
- What is the annual monitoring report?
- How long will a LEA remain in escalation status? 6 years?

- Special Education Review & Support Team
 - What does Technical Assistance mean? Need more clarification on how districts needing improvement are going to be supported.
- Special Education Escalation Team
 - We are concerned with this team being made up of non- special education personnel. How will they be selected? Will the team include people with extensive special education experience?
- Identifying high need LEA
 - How are high need LEAs identified? What is the specific criteria being considered?
- Is the pupose of the 3rd party because TEA is also being montired? What is the purpose of the 3rd party?
- Monitoring
 - Plan to monitor crates an excessive burden on the district with no ability to recoup the time and effort to keep up with these audits.
- Texas Law
 - Stop making Texas law more stringent with more requirements than the federal expectation.
- RtI Purpose
 - RtI has a purpose, so when students are considered for services through the process, it can eliminate the need for more restrictive environments through a special educational referral. Thus creating more efficient and effective practices through targeted referrals
- There seems to be a lot of funds going out to third parties (top-down process) and it seems that it would be more effective for TEA to partner with for example University researchers and with districts (bottom-up process). This seems that this would be the training that would be needed.
- 3rd Party providers
 - How will TEA monitor to ensure that the many 3rd party providers are providing consistent advice? It seems like more opportunity for "preferred" vendors (Friends) to receive contracts. And again, funneling money away from Districts. How will the effectiveness of this Escalation team and it's 3rd party vendors be Monitored? Maybe TEA should consider adding Monitoring for the monitoring?
 - How will TEA determine who needs intensive technical assistance?
- What institutes a negative report, a high- needs LEA, and what is the role of PBMAS in monitoring the activities?
- There is a concern that there will not be a process that fits the myriad of districts (i.e. very small rural districts, small districts, vs. very large districts)
- Does intensive technical assistance equal a monitor
- No Gap
 - If you don't have a gap showing under-identifying of SpEd scholars, should be given a waiver not to be monitored.
- ISDs with no gap
 - ISDs with appropriate percentages (what are those?) identified should not be subject to corrective action 4.
- Third Party
 - Again, we don't need third party provider. Support our Region centers.
- Monitoring
 - Districts didn't create a need for monitoring, the state did. Allow us to monitor and report.
- Evaluation
 - How will 'suspected with a disability' be measured for missed child find?
- Technical Assistance
 - What is intensive technical assistance? Is that simply more monitoring? TEA will negotiate pricing, but that's still an expense to districts. So, the offer of technical assistance support is unfounded

- Technical Assistance
 - What does this mean? Look like? What are they helping? What can they do that our districts/regions can't do?
- CA 4
- Pieces you are offering to put in place, districts will have to fund.
- Certification
 - When the state puts an injunction on teacher certifications and credentials, it only hurts the district in hiring and retaining staff.
- escalation team
 - If at 8.5%, does this mean you were not doing your job? Seems like an over simplification
- Monitoring
 - In smaller districts, this will cause a loss in instructional time as we will have to quit providing services to children to pull the teachers to help us with the documentation, etc.
- Intensive Technical Assistance
 - What does this mean? Hopefully, TEA has been highly involved prior with support, coaching, and training.
 - Where is the 85 million dollars to fund this plan being taken from other funds? Or is this additional funding?
- What data would trigger a "negative special education monitoring report?"
- Escalation Team
 - We are just renaming a program that is being phased out and brought back. PSPs are now going to be for this Corrective Action Plan
- Escalation Teams
 - DEC didn't work. What have we learned from history that will keep this from failing as well with LEAs having been penalized in the meantime?
- Escalation Teams
 - Who is going to pay for this? Once again, LEAs are being told to cover the cost for TEA's mistake.
 - Aren't our RTI teachers, Dyslexia teachers, and ESC help already an Escalation team? This seems to be reinventing the wheel. OR is an Escalation Team a PSP in disguise and aren't those being phased out?
 - Is there going to be a threshold for identification? For example, if a district has over 20% of students receiving RTI, 504, or dyslexia services will they be required to have an Escalation Team at the district's expense? Will there be the same threshold for all schools or will schools with low enrollment have a different consideration than larger districts?
- Escalation Teams
 - We are phasing out PSPs in one area and then creating a whole other area for them to provide services within. If we think we don't need them in Accountability, why do we need them in Special Education? What has changed? We keep reimplementing things that we have already tried and that didn't work. Why?
 - Again, where is the money coming from to pay for the third party services that LEAs will have to secure?
- Bullet 4
 - What constitutes a negative special education monitoring report?
- Money
 - More money for third party and TEA programs equals less money for educating children.
- Escalation Teams
 - 12 FTEs, when compared to the 24 FTEs on the R&S teams seems too many. Take 1/3 of this set and move them to the R&S group.
- Rubric
 - where's the rubric?

- Funding
 - Where does the money come from?
- Arrow 3 on timeline
 - Arrow 3- monitoring by May 2018? Is this the correct date? Should it say May 2019?
- Director
 - I think it is a poor decision to have 1 director with shared responsibilities.
- Sounds like the current IR current process would work without creating something new that will involve additional costs.
- Will this process result in positive student outcomes or will it just be punitive?
- Third Party
 - Again, keep money in our system with people that have a local, vested interest. Fund ESC's to provide their own teams.
- Will the monitoring team be comprised of EXPERIENCE special education and general education practitioners?
- Already addressed through IR and SPP. Why add more when a process is already in place?
- Notifications to Districts
 - When will districts be notified of this list? What will determine a "high need" LEA? How many year's data or information will the decisions be made upon?
- Will this corrective action have a positive impact on student outcomes or is it just punitive toward districts? Districts have historically taken care of students, especially when effective support systems (financially and systematically) are in place
- Time to adjust. We need time before we get evaluated. Give us assistance.
- Will this help student progress, or will this just be punitive to schools
- Positive Student Outcomes
- Our focus should be on our students!! We need support and guidance to make sure we don't lose focus on what is important....our future...our children.
- TEA needs to be more transparent, schools are going to be measured and graded based upon TEA mistakes...
- Escalation team has a negative connotation.
- Seem to be very "3rd Party Happy"
- Escalation team
- Negative name. Put the support staff at the service centers instead.
- High need LEAs
 - When will they know? What is it based on? How long of history with being high need?
- How will this be staffed. Someone who has been in these programs should be on these teams.
- This should be aimed specifically at the 8.5% mandate and the problems that TEAs push toward 8.5% may have created.
- Define "intensive technical assistance."
- Who will pay for the technical assistance vendors
- Clarification of the data used to identify those districts with the gap between students who are identified with special needs versus those who have been previously identified.
- Technical assistance should be accessible at the region levels and supported at each district.
- Escalation team
 - Change the name. Escalation has a negative connotation and should be coming from a place of support.
- Utilize the third party funding to provide funding at the LEA to support staffing with the additional responsibilities to meet monitoring requirements.
- Provide a systemic approach or rubric to determining those districts who are "in need" of support and in the order it should be provided.
- Who are the technical vendors and who bears the responsibility for cost? This should be funded by TEA.

- This looks like a gotcha team for districts who have previously complied with PBM requirements.
- Small districts need support for creating teams when one person is responsible for multiple programs.
 - Districts need more funds to increase improvement teams
- The definition of a High Need district, needs to be defined.
- SPED Monitoring Report
 - If we're including RTI, Section 504, & dyslexia on this report, is it to be inferred that these are now moving "under" SPED?
- FUNDING!
 - Where are the smaller districts going to find funds to hire or contract vendors? They are already using all of their budget to pay for staff and educational programs.
- previously complied with PBM requirements. Small districts need support for creating teams when one person is responsible for multiple programs. Small districts need support for creating teams when one person is responsible for multiple programs. Districts need more funds to increase improvement teams The definition of a High Need district, needs to be defined. The definition of a High Need district, needs to be defined. SPED Monitoring Report SPED Monitoring Report If we're including RTI, Section 504, & dyslexia on this report, is it to be inferred that these are now moving "under" SPED? FUNDING! FUNDING!
 - Where are the smaller districts going to find funds to hire or contract vendors? They are already using all of their budget to pay for staff and educational programs. add Ideas or Additions? The Escalation - team The Escalation - team needs to be specific that a student might be making progress in RtI in second grade then come to a gap or a road block a few years later and then qualify. The escalation team needs to focus first on the districts who admit they are in need. Be specific on what the technical assistance will look like. Technical Support Technical Support
- Talking out of Both side of our mouth
 - The RTI/Dyslexia is made to delay
 - SpEd referrals so that we don't over identify based on a knee jerk reaction.
 - how long is too long in RTI? How long is too long in Dyslexia?
- Research says you never are cured of Dyslexia - you just learn skills to cope and overcome- Should we ever refer a dyslexia to SpED?
- How will this impact the SpEd assessment timelines?
- What is the SpEd Escalation Team? What criteria will be utilized to initiate the team? How will that assist local LEAs?
- What qualifies as a negative monitoring report? How will a district get this? Since PBMAS is no longer utilized to id.
- How are third party technical assistance providers identified? Who would be vetting them?
- Who will pay for the third party technical assistance providers?
- Escalation Team
 - Really? So another PSP but for SpED? We can't get our kids to move so make us spend money with a state "escalation team" - Hmmmmmm
- What's the impact on local diagnosticians in assessing students in an appropriate amount of time?
- Escalation Team
 - Who is the Escalation Team? Is this the old DEC team? Who funds this?
- Where do ESCs fit into this plan? How will region liason be used? Monitoring
 - Is this monitoring report what we now know as PBMAS? It shouldn't be from that 6 year visit - because yall couched that as "friendly" and "here to help"
- Escalation Pathway?
 - What is the intensive technical assistance that will be provided?
- Retirement
- Escalation Team

- This sounds like we will be required to put more students in special ed even if we have other programs in place to help students. This is not about students and their success.
- Higher
 - what intensive technical assistance will be provided?
 - So are we now hitting the districts below 8.5? Isn't that equally punitive to districts
 - TEA will negotiate pricing? You mean we have to pay for our punishment?
 - We already difficulty recruiting high school resource teachers who are certified in sped and also in the specific teaching area. How will certification requirements change?
 - What will the criteria be for the escalation team members? Will they be educators?
 - Will they have knowledge of Texas laws?
 - Will technical assistance vendors only be used one time (which is funded in the plan) or will the districts have to pick up the cost if they are needed for a longer period of time?
- ESCALATION TEAM
 - This is a horrible name for the team. You don't want us to feel threatened by these visits, but the name itself sounds threatening.
- Monitoring
 - Not all LEA's need additional monitoring.
- Escalation team - sounds harsh - are we escalating the schools? Perhaps a different name. Escalation is punitive, which TEA continues to say this will not be.
- Where will the \$85 million come from? If you have that now, why hasn't that been coming to the districts?
- What is the criteria that constitutes a "negative monitoring report"? If you are in an SSA, you could be monitored multiple times in a year. CAP4 mentions CAP1 being in the escalation pathway. Does it apply to CAP2 and 3 also?
- GET RID OF THE ESCALATION WORD!!!!
- Is this like what happens on an IR campus at the cost of the district?
- What should districts who have been consistently penalized for OVERIDENTIFICATION expect when monitoring does occur?
- Escalation
 - Change the NAME! Escalation has a horrible negative tone-
 - What will the escalation team be responsible for, what all will they be doing.
 - What exactly is this going to look like Escalation Team
 - Surely we can find a better name for this!
- What are the penalties for overidentification to the proposed 8.25%?
- Concerns of 3rd party vendors
- What if the legislature does not appropriate this funding?
- MAJOR concerns of 3rd party vendors.
- Concern about the cost of prices from service providers. Who is going to pay for this? TEA? LEA's?
- Wording is inappropriate and sends a threatening message.
- Having a report withing THREE YEARS. There will still be huge gaps in supporting CURRENT and IMMEDIATE student needs.
- Can the Escalation Team members NOT BE FROM the metroplexes only?
- Technical Assistance Vendors
 - LEAs need to be consulted and included in the choice of these technical assistance vendors. Money can be spent better than with 3rd party vendors.
- Shouldn't the TEAM MEMBERS reflect the demographics of the ESCs?
 - Who identifies the High needs LEA teams- what qualifies a school as a high needs.

- How do you know you can give 100% support with a team of 12, etc. when the needs have not even been evaluated and uncovered yet. There are over 2,000 districts in Texas.
- I lived in Austin once and Austin is not representative of the whole State. I love Austin people but let's avoid only city people.
- Districts still bearing the brunt of the costs.
- Who will provide the training and resources for the school improvement team?
- Will technical assistance be provided onsite?
- We need to get away from 3rd parties- losing funding. Look at what happened in the past when parents didn't want third party providers to have students information
- What is the definition of a "negative SPED monitoring report"?
- What is the definition of intensive technology assistance?
- Districts around the state need some uniformity in how we identify needs...however, we need understanding of the more rural areas and considering how this impacts the smaller schools.
- The removal of the 8.5 indicator has already made our practices better. how is this going to make schools serve students better?
- Is it possible for ESC's to receive this training in order to provide the intense technical assistance needed to the LEA's?
- Funding
 - Texas needs to fully fund education and quit passing the buck.
- There needs to be an appeal process created.
- TEA provide the appropriate data to legislatures in order to get the adequate funding for the LEA's to receive the intense training and technical assistance?
- What twelve districts in Texas were visited to determine the needs and corrective actions? Was it a representative sample of this large of a state?
- Concerned about the Support Team Having unrestricted access to student info. Visits can be announced or unannounced and conduct confidential interviews. Why unannounced? What's the purpose?
- That is a problem: unrestricted access and unannounced visits. What if we are testing or having ARDS? In small areas, we can't pull our teachers to do an unannounced visit when they are testing/teaching/ etc (specifically STAAR test days). In a small district our RtI/504 coordinators are also the CTCs.
- What data will be used to determine what year you will be monitored? Year 1 or Year 6?
- third party technical advisers would be a barrier- what level of training and experience do these individuals have. Are they going to be more staff members that have no knowledge about the field and what teachers are facing.
- Our biggest concern is that there isn't enough information provided- there are far too many What If's. Will there be additional training's and information meetings prior to the mandate day.
- What is this going to entail for a "D" or "F" rated campus and/or district?
- ESC needs funding to provide more staff.
- GAPs
 - For the identified gaps, what is the criteria to determine those gaps?
- The Escalation Team sounds very intense. What type of support will they offer and what would be the average length of the support LEAs would receive from this team? Once the districts with the most immediate needs are addressed, how will TEA determine if the LEA needs the Escalation Team? How will TEA assist LEAs with funding required to improve student outcomes and compliance?
- Third party vendor- How effective are these teams? Where are they coming from? What are their qualifications and will they be objective?
- Escalation Teams
 - How are LEAs requiring additional supports identified and who will be identifying them?

- Will the third party technical assistance providers be available to all districts even they are not being monitored by the special education escalation team?
- Funding is a concern for SPED services
- Who will absorb the cost for third party technical assistance?
- Third party is a concern
- What is the turn around for feedback when the working with the high needs/prioritized districts? And follow up expectations.
- How are the districts chosen for the opportunity to work with the "Escalation team"?
- The plan references student who are "identified with special needs", please be consistent and use IDEA terminology of students eligible for special education.
- The term special needs has many different connotations and does not necessarily mean the student is in special education.
- What training will the escalation team members receive to ensure continuity?
- What constitutes a "high needs LEA"?
- wondering where the 84 million will come from? tax payers? Feds?
- Escalation Team
 - Will the role of this team be supportive with resources and guidance for district improvement or punitive in nature?
- Special Education Report
 - What constitutes a negative monitoring report, once criteria development will districts have the opportunity to appeal?
- How will escalation districts be identified
- Third Party Technical Assistance Providerr
 - What is the vetting process to determine if these vendors are highly qualified to align with district needs, and who will be monitoring their effectiveness?
- Technical Assistance
 - Define "direct technical assistance" and what is "intensive technical assistance"?
- Suspected disability
 - How will "suspected disability" be defined?
- How is a district selected for the "escalation team"? criteria?
- All the focus is in TEA's effort to monitor, what about at the district level.
- Remember this plan has to be put to action.
- Put the money where it's needed. training. This would benefit all students.
- What criteria determines that a district is in need of more specific support from the Escalation Team provided by TEA?
- The funding that is being set aside for the Escalation Team should be sent to the districts that have remained over the cap and remained staged.
- Concern: What does "self-reported" gap between students who are identified and those who should have been identified mean? How will districts really be identified?
- Concern: The term "Escalation Team" reeks of punishment; punitive and not supportive.
- Concern: Will districts have enough time to implement changes?
- Again quantitative monitoring efforts by the state are unable to capture the quality of services and challenges districts face.
- The 8.5% monitoring cap is what initiated this process
- Escalation team members need a background in special education
- Who is going to fund the 3rd party technical assistance? Make sure your house is in order before you come knocking on my door.
- Region service centers should be the ones to provide the support instead of TEA.
- Wouldn't the money spent on 3rd party vendors be better spent elsewhere? This plan seems to just pull our finite amount of money and resources or staff away from districts.

- Concern: Name of the review team! "Special Education Escalation Team". Already a derogatory term! What is the escalation pathway?
- Who are the third parties? How will they be selected? Give the districts the money....what is the toll free number to TRS?!
- So TEA is providing technical assistance vendors, but instead of just providing support, districts are being asked to pay for the support???
- Concern: Funding for implementation of plan. We have been bombarded with unfunded mandates. Will the requirements from this plan be funded?
- Concern: What exactly does the 3 years time frame mean?
- LEA's with Residential Facilities
 - Some LEA's have residential facilities that enroll students within that LEA's district to go to school, even though their parents live in a different LEA. These residential facilities drive up the LEA's population of SPED numbers. Although the 8.5% is no longer a factor, serving these additional students causes more stress on the LEA's resources. TEA should research the implications and impact of residential facilities on an LEA's school system resources and budget.
- It seems unfair that TEA is monitoring LEAs when they are the reason the 8.5 cap was in place.
- What does the term "suspected with a disability" be measured?
- What data supports that spending 1.5 million on an Escalation Team has any type of benefit or impact on a positive student outcome?
- Seems like TEA is make special education responsible to referral process that is really a district decision
- At what point did TEA decide that they should be the procurement agent for LEAs? Is this a function of the TEA?
- How are struggling learners being defined?
- Where will the funding for the Escalation Teams be found?
- Why is it necessary for 4.5 upper administrators to supervise 12 workers on one administrator?
- Why is so much money going into two different kinds of teams, monitoring and escalation teams? Why are we using this money on 46 new FTE's when TEA just expanded their team by 39 FTE's? This is a lot of taxpayer money that is not directly related to student services.

Ideas or Solutions

- TEA should include funds that will be provided to the LEAs to correct the actions that have been implemented.
- TEA you should follow the TAIS process that you require schools to follow.
- The order of things...
 - Clarify data elements for review and provide resources and professional development prior to implementing desk audits, on-site visits, or escalation teams. TEA's target rate of 8.5% has been in place for several years and school districts have implemented general education supports and services to minimize the number of students in need of further specialized instruction, it is going to take some time for schools to "realign" to any new expectations or guidelines.
- Start by clarifying your current guidelines, step two allow districts to implement these guidelines, step three collect data the monitor
- TEA should include the changes that will be made at the TEA that does NOT include hiring additional staff.
- Technical Assistance Vendors????
 - Instead of paying money to outside companies to serve as a resource to struggling schools, the financial resources may be allocated to LEAs who are being successful with their efforts of improving student progress in all sub populations, and giving them the opportunity to assist LEAs who may be struggling. In addition, we have our ESCs which could be used as a valuable resource for LEAs, as well.

- Region Service Centers should be utilized to provide support to districts in need rather than paying the additional monies for Escalation Teams. Region service centers already have established relationships with school districts and are centrally located to those districts!
- Can we call the escalation team something else. It will make us feel better.
- How far back are you going to go to determine what districts you will focusing on.
- What is the criteria to make you a high needs LEA?
- What does intensive technical assistance looks like? Are they going to come into the classroom and show the teachers, i.e. model and then allow them to perform, etc.
- Districts should have a minimum to prepare for the Escalation Team visit?
- What is the Special Ed Monitoring Report? (PBM)
- Who are the third part technical assistance people? Are they from Texas and do they understand special ed law?
- Technical Assistance Vendors need to be trained special education staff with a background in special education
- Agreeing to giving the money to ESCs.
- Why are we spending 84 million on more TEA staff? Why weren't the districts given these funds, when all are in such a dire need for additional monies
- Specific Timelines for Teams to come in and Districts who do not receive a negative Special Education Monitoring Report be able to request assistance from the Escalation Team.
- Would contractors or a third party agency be considered to monitor TEA on this process?
- Technical Assistance Vendors
- Recommend creating the oversight or Escalation Team for each Regional Service Center. Individuals who are familiar with the population in the area and have good relationships with the local districts as support personnel rather than "big brother" monitors from Austin
- The state has already identified processes for RtI. The team should focus on instructional strategies that focus on interventions for students vs focusing on referral processes.
- Escalation teams members should be made partly of staff with assessment background.
- TEA needs to set prices for vendors providing services or evaluations prices to avoid the escalation prices for these.
- Not enough evaluation staff to provide all these additional evaluations. There is already a shortage in this area.
- Who will make up the Escalation Team?
- Statute of limitations of on "compensatory services" should not exceed 1 year.
- The ARD committee is afforded the authority and is required to consider the Least Restrictive Environment. Is the intent of these steps designed to require 2 digit increase in percentage of Special Education identified students, only to have the ARD committee say all services are provided in the general education setting, including dyslexia?
- Concerned for any district who has listened to Dave Richards for 504, because he continues to lead that it should be easy, may not require physician information (like we would for AI, VI, OHI, TBI, OI). Any evidence of suspicion allows them to be covered. Districts continue to make them eligible for 504 services for things that would never be an IDEA eligibility. 504 for things that are not a disability.
- What is our anticipated obligations to evaluate again, prior DNQ responsibilities that cover all areas of suspected disabilities?
 - When districts are considering "students who are identified with special needs and those who have been previously identified," what is the historical time frame for review?
- Parent Support
 - What will we do with students who need services but are habitually absent or late and/or pulled out of instruction to receive specialized services?
- Rubric to understand standards.

- Implications of EDGA
- Should the Feds re-evaluate disability guidelines for IDEA? The lines are blurred
- Sp Ed Escalation Team
 - The Escalation Team monies of \$84 million would be better spent with the districts, or in the ESC's, so closer to the implementation source?
- Specialized Staff
 - Why create many specialized positions at TEA? Districts need highly qualified specialized staff for dyslexia, RtI and 504. Put funding toward the creation of specialized positions for school districts. Many districts assign dyslexia, RtI and 504 as an after thought to someone who already has too much on their plate. This results in a lack of extensive training and thorough understand of each program
 - Many districts did not do anything wrong and correctly identified students as required by IDEA. The State of Texas was the one that put the 8.5% in place and then put in sanctions for those districts not meeting the %. Now the districts that followed the rules will be punished again with more monitoring, required training and all with little of not funding. Can someone explain this to those of us following the rules.
- Get campus and district administrator buy- in and support. If not, this will go nowhere. General ed teachers also need to be involved.
- Campus principals and superintendents need to be directly involved and informed
 - As the timelines are created, training of superintendents and principals in what will be expected is critical. Like T-Tess, there needs to be clear expectations and a rubric that helps them understand the expectation before the first data collection point occurs.
- Checklist of what an Escalation Team is looking for - what the "most clear or self- reported gap" is.
- Checklist of what an
- Model/Template
 - We need a model/template/criteria of what the team will be expecting.
- The state plan should be focused
 - The state knows the districts who are in the greatest need of technical assistance and they should be the focus of the plan
- Who will be on the Special Education Review and Support Team?
- Provide funding for technical assistance. Define special needs.
- State funded IEP programs/software
 - This type of investment could free funding to meet some of the requirements on the LEA
- Region centers distribute info/resources
 - Consider modeling manuals and guidance docs after what region centers are already doing. Region 4, 11 , 18 and 13 already provide expansive resources to the state. Can support be modeled in similar ways so that they are user friendly for the LEAs?
- The current PBMAS plan has a lot of merit and could be a good basis for this plan; however, things could be done a little more simplified version of the same process.
- Qualifications for the Escalation Team be known upfront
- Give us what we need to do upfront before bringing in the reviews
- TEA should fund all necessary teams and needs for LEAs
- Make is all one team, not a separate team for "Escalation Team"
- Have the same person over a certain region to build relationship for true SUPPORT
- TEA needs to pay for technical assistance for LEAs SUPPORT
- aqualitative rating system to look at dyslexia
- Wedon'tfeelthatyouarereadingour suggestions
- Areweprovidingreasonabletime. Research says corrective action should take place over a year, so why are we responding in such a shortened time frame?

- Retired people to make up these teams, so they are people that have been there and done that...understand the LEA side
- What type of training will the third party providers receive?
- What are other states doing to identify and serve specialized populations?
- Once staff is hired, publish names and qualifications
- Texas needs to define special education services, including how other states implement
- Lobby the state legislature to not cater to parent advocate groups. Why do we think we are better than the federal government.
- Funding
 - The LEAs need the funding...
- How will high need LEAs be defined and what measurement will be used
- Create a plan with integrity
 - Go in and monitor schools that are failing to follow the laws. Do not put all LEA's in the same group. The majority of LEA's have been doing right by our children.
- Escalation Team members
 - The escalation team members should be people who have worked in some capacity in special education in TEXAS public schools. They should be knowledgeable of special education laws, practices and history of Texas special education. Also maybe a different name than "escalation".
- RE-name the team
 - District Support Team, Collaborative Support Team, anything would be better than Escalation.
- Create a culture of the state partnering with the LEAs in order to improve education for ALL kids.
- Start with districts/regions who are at or under the 8.5%
- TEA should fund every new initiative
 - TEA's corrective action plan should include funds for every new initiative. The OSEP letter stated repeatedly; TEA failed...! That means TEA needs to fund every activity necessary to correct any procedures that were implemented due to the 8.5% cap that was implemented by TEA.
- Have TEA put personnel at the ESC vs. monitoring/escalating teams for CONTINUAL support of districts. More boots on the ground here in the regions vs. in Austin.
- Put a call center in every ESC vs. just one for the state. The relationships are here in the region.
- School Comparisons
 - A school's demographic information should be considered when comparing schools. All LEAs in Texas do not have the same demographic make up. They are vastly different from each other. They cannot be compared on a "one size fits all" scale.
- Technical Assistance
 - Our districts most need support with RTI systems, improving academic and behavioral outcomes for students.
- Monitor through a computer system
 - Develop a universal computer system that everyone uses so you can monitor it that way.
- Monitoring through SPP
 - Why can these numbers of students in RTI/504/Sped not be monitored through PEIMS?
- RTI and 504 should be included in the monitoring process
- Look at other states
 - What are other states doing to monitor SPED based on OSEP's guidance.
- Reconsider the name of the team. Special Education Escalation Team has a negative connotation.
- Proactive Support
 - FTEs should be added to the activities that are proactively addressing the issue of lack of intervention fidelity and appropriate progress monitoring in our schools; not necessarily as a response to schools who are not meeting the mark.
- Escalation Teams

- Are the teams going to be trained in the difference between an Urban LEA and a remote rural LEA. I know that we always have the topmost concern of the needs of the students, but models of implementation look very different across all these demographics.
- Cost of additional TEA personal and contracted third party will diminish the amount of state funds that we currently have available.
 - Will the general fund be reduced because TEA is using the funds for the Plan of Action?
- Evaluation
 - Will TEA develop a program to train additional Diagnosticians who will be needed to evaluation students who Do Not Qualify for Special Education and Related Services? TEA has programs in other high needs areas like Speech Pathology, Audiological Impairment Teachers and Visual Impairment Teachers.
- Diagnosticians case loads are over the top now, how can we take care of all the assessments? Can TEA help us with more Diagnosticians to help carry the load? This is a huge problem for rural school districts.
- Evaluation directs programming vs. programming directing the evaluation.
- Take data from SPP- for assessing high needs schools. This will only cover SpEd- how will we decide for other areas?
 - It seems like we are spending lots of time, energy and money on requirements by the state when districts are not meeting standards which require action plans in multiple areas (working on 20 different things), instead of all working together, as a district ONE TIME, rather than TIP on this area and TIP on that. We need to focus all together as one (not separate PBMAS/SPP). Get all data in the same year and clarity on what drives accountability.
- We are still in the blaming mindset. It will take time to move to the best way to solve the problems and we need changes yesterday. Increase the training and support to our local directors, administrators, ESC leaders, etc.
- Help us raise accountability on all levels, in addition to special education.
- Escalation is not a good name for the team of individuals.
- Monitoring
 - Only monitor districts that are under identifying special education scholars. Not all districts need monitoring.
- Using Region Centers
 - Using our Region Support Centers, not third party vendors, will save us \$1.5 million.
- 5 year plan
 - What happens after 5 years of implementation of this plan, will funding continue with TEA for oversight?
- Escalation teams should be trained and geared toward helping LEA's along an already spelled-out process using identified instruments for progress measurement and criterion for assessment.
- Visits to districts should be geared towards assistance and support not compliance.
- Support vs. Compliance
 - We need to feel supported not found guilty when we were only following the state's guidelines. Wouldn't this make us state employees?
- Focus on change as a positive rather than a negative.
- Compliance have never changed attitudes or helped students.
 - It must be meaningful and relevant.
- Advance notice with process the data used for the monitoring. Using data that is already been gathered does not allow for change. Opportunity for three year plans.
- Dyslexia Handbook
- Don't recreate the wheel - modify what exists
- Send out notices to district about changes - as well as - offering initial training to those new to the field
- PD

- It is hard to put teachers (who don't exist because we can't find people to hire) into an "intensive technical assistance" training program.
 - We need help finding teachers in all areas - especially SpEd, Bilingual
- Include ESC personnel in the escalation team who knows the LEAs.
- Change "Escalation" team to "Support". It sounds like we are being punished, not helped.
- Develop an FAQ on TEA website so that we can see what other regions are asking and how TEA plans to respond.
- Corrective Action Four
 - This is a good plan--only the LEAs who have concerns should be subject to the corrective action plan. Why should an LEA who has not been under identifying students be subject to the same requirements as those that were not identifying students.
- Include Region 19 staff as part of the escalation team.
- COOPs for smaller ISD's
- Our Region 19 is very involved with schools and the ESC's should be apart of any third party implementation.
- The Escalation - team needs to be specific that a student might be making progress in RtI in second grade then come to a gap or a road block a few years later and then qualify. The escalation team needs to focus first on the districts who admit they are in need.
- Be specific on what the technical assistance will look like.
- Technical Support
 - Make technical support helpful to districts as a way of moving the needle, not a compliance gotcha. These jobs in special education are incredibly hard requiring a breadth of knowledge not typical in other jobs in education. Help districts get better rather than creating a situation that further burdens directors and coordinators. There is an opportunity here to do something great that will lead to a lift in student performance across the state if TEA comes in as a partner rather than as a compliance monitor.
- Need to address the timelines for monitoring to assess the criteria to help districts self monitor prior to the TEA visits.
- Escalation teams be created through TEA with input and active involvement by the Region Centers.
- Technical assistance vendors! Really - put the money in the district resources not to an outside party. In districts with High Needs - fund personnel within the district to address that districts processes.
- What is the criteria to be identified as a high need LEA? Have specific criteria included in the 2nd draft.
- Provide guidance on the process of being assigned an escalation team. How much time does an LEA have to be relieved of the assigned escalation team.
- Districts can only evaluate so many students with current personnel - fund district personnel through a grant to address those additional short term costs.
- Technical assistance from TEA will need to include resources that can be used by the district to meet student needs.
- Special education input
 - The panel making decisions and developing/ revising the plan should be knowledgeable in the laws of special education, not by another third party.
- Can districts be allowed and given the option for a provider for the student.
- Utilize elements from the Facilitated IEP training for the escalation team.
- Increased encouragement for quality university programs to recruit and train assessment staff (Diags, LSSPs special ed teachers and speech therapist
- need more training in TEKS and scaffolding
- Speech eligibility includes the slow learner. Dismissal to 504?
- State Regulations 504, Dyslexia and other areas such LD eligibility will have to be considered for revision to ensure consistency.

- Add training and requirements for general education teachers. It is still an "us and them" mentality for non-sped students.

Anything Else?

- Alt Cap
 - Corrective actions may trigger other disprop. indicators such as Alt cap; SpEd-LEP; etc.
- Escalation Team?
 - How is this different from the TEA monitors who oversee our CAP and the evidence submitted when requested? How will this help the process when it is after the fact of the found negative monitoring report.
- Funds
 - Where is all this money going to come from to pay for all this corrective action proposed strategies, staff, resources, vendors, etc.?
- The Pendulum Swings back...
 - Disproportionality was a chief concern years back which subsequently led to the creation of programs like RtI in order to keep certain populations of students from being overidentified in special education. With this return to "test everyone"... we will again be faced with disproportionality issues. With the new 98 indicators (which all revolve around monitoring based on race/ethnicity, socio-economic factors, etc.... we will again be faced with the issues that led us down the path we are currently in.... basically ... here we go again!
- STAAR Alt 2 cap
 - How is this whole foundation of this CAP going back to over- identification of students NOT THE SAME argument with respect to the current federal 1% CAP on special education students taking alternate assessments (STAAR ALT 2)? We also have a PL assigned in PBMAS on that and are penalized when over the cap. When will we get our hands slapped as a district and state on that issue from OSEP too when that is a federal decision from ESSA/NCLB? Can we start getting some guidance on improvement on that?
- Appendix B -- will changes in credentials require dyslexia teachers to be sped certified?
- Where will the \$84.486 million come from?
- As we inevitably add more students who require specially designed instruction, will there be a corresponding increase in funding from the state or Fed govt to support this?
- Can we include private
- District-level funding
 - Districts that must have the escalation team- will they be given additional funding for the additional personnel needed to complete paperwork, attend meetings, track data?
 - Otherwise, it will negatively impact students as resources are pulled away
- What are credentials of escalation team?
- What is the measure of a negative escalation report? Who is the school improvement team?
- LEAs need assistance, guidance, professional services and training, and always funding. We do not need punitive actions and threat of failure hanging over our heads.
- Why should a district have to pay a third party vendor, why isn't TEA?
- How are the vendors going to be vetted? Why couldn't TEA provide the service?
- Why aren't the Education Services able to provide services?
- 3rd Party
 - Will the agency follow EDGAR, competitive bidding provisions?
- Why is TEA planning on spending \$84 million over 6 years for an escalation team?
- How do you plan to fund past year one for technical support? Will LEA's be required to fund technical support?

- How do LEA's receive a negative report if the visits are suppose to be support for best practice and not compliance?
- Is there a cost to the district if you need intensive technical assistance?
- Why are we not using our ESC 's who are already in place for technical support and monitoring?
- Will there be consistency among the teams monitoring and supporting districts?
- Will the monitoring formula/plan/documents be available to districts so that they can self monitor in the years in which TEA is not scheduled to monitor
- Monitoring Report
 - Criteria? What will be reviewed as part of this report so that districts can be proactive?
- 8.5% cap
 - I understand that the current commissioner inherited the cap situation. It was in place for years prior to his arrival. He is taking a bad rap for something inherited. I firmly believe that most districts did what they felt was best for students. I believe the data since the cap was introduced would support that many districts were above the cap and therefore were doing what they needed to for the students of their community.
- This meeting
 - Interesting that the meeting began with the statement that TEA personnel would not be answering any questions and they would just be reading the slides to us for consistency sake. All questions need to be submitted into the portal. IT is kind of like Mr Haney of "Green Acres" stating that he had some snake oil to cure what ailed you, but he didn't have it with him today.
- Focus Group meeting
 - TEA has missed the boat. All the focus group meetings are asking for sped students and sped parents...those kids have already been identified. However, this OSEP CAP is siting the agency for failure to identify. The wrong group of people are being targeted.
- Texas is great, but look at other successful states with effective education systems
 - Look at other states and how they run their education system. Everything from staffing, data management systems, etc are standardized across other states "districts".
- Local budgets
 - Due to MOE requirements, if the LEA is having to spend extra dollars for 1-3 years to fulfill TEA's CAP, will the MOE requirement be suspended to allow the district to meet TEAs mandated activities.
- Who are the considered stakeholders
- Escalation Tea
 - Negative connotations. Change the term.
- Negative Special Ed. report
 - What determines negative? Who gets it?
- What is a negative monitoring visit? Not enough referrals? Not enough SpEd students
- Third Party Technical Assistance.
 - WASTE OF MONEY!
- 3rd party TA
 - Third party TA providers? Who will monitor that this group has the training and skills needed to provide TA? A non-public school entity providing TA to Sped departments regarding services is a concern. Ex. medical vs educational therapies...a highly skilled Speech therapist providing private clinical services cannot answer FAPE questions.
- Districts of Innovation
 - Would districts that apply to be a district of innovation be allowed to write in flexibility to the monitoring process?
- Who are the 3rd party technical assistance providers?
- Identification?

- How is TEA going to get the information on the gap between who is identified with special needs and those who should have previously been identified?
- Monitoring Report?
 - What is this made up of? What are the criteria that would determine a positive or negative monitoring report?
 - How do you quantify “missed” children
- "procure and negotiate pricing for service providers". Clarification on this would be helpful. It sounds like a catalog of resources that will be given.
- The way the system is being set up seems that it would produce more conflict and not collaboration between parents and LEAs
- Where are districts going to find all the staff to support services and what is TEA/state doing to help this issue?
- When will TEA/state see all learners as gifted and in need and strive to implement a better student engagement model to respects the needs of all learners?
- What are the long-term implications of qualifying so many children as having special needs? What will this mean for children when they become adults?
- Define a negative Special Education monitoring report.
- Can we consider a learning model where we teach children how they best learn and what gifts they have and how to best utilize them?
- Appendix B other actions - the certification piece. If special education is tied to teacher certifications, will TEA create a module like they did for dyslexia identification academy? That way teachers can view online and have a certificate of completion for proof without adding burden to the LEAs to create additional trainings on top of what they already do.
- We believe in accountability for providing the benefits students need to be successful in futures that are current unknown. Unfortunately, accountability at the state and federal levels is exclusively focused on test scores and ignores the gifts and talents our students have. Let's build a better accountability system that focuses on what students need.
- Let's work together to build a better model. Let's research and engage in a way that helps us understand what is happening and how to disrupt patterns and trends that are not productive. Hammering people on the head and pretending we have all the answers does not work. Most educators I know want to serve students well and are already greatly impeded by the mountains of paperwork and compliance indicators. Many are leaving the field or not coming in the first place, due to frustration over the way the system works.
- Local ESC needs more funds
 - Our local ESC provides wonderful support to us, but if more is required of them, they will need more funding. I would rather see the funds required to create the technical assistance to go to my ESC so they can provide the assistance I may need.
- Many of the services in this plan can be done through the ESCs.
- Will there be a SpEd director for the state before doing all of this?? What will be their qualifications?
- Does TEA realize the personnel needed and funded to accomplish all of this? Just tell districts upfront what to do.
- This sounds all very punitive
- End high stakes testing! It is effecting all of these areas and our students emotionally.
- What about "intensive technical assistance" for general education?
- YES! Just tell us what to do! The whole third-party thing hasn't worked out well in the past. They don't have enough experience to really know what they are doing... Give the ESCs and the LEAs the training and let us go forth.

- TEA should consider an advisory board/council that consists of Texas SPED directors, ESC center staff and Texas evaluation staff that can provide feedback to the effectiveness of the Corrective Action plan and can make recommendations directly to TEA.
- Special education folks have been stating for years this is a concern...
- I need further information on the School Improvement team and the transition to the Escalation Team. SI Teams usually don't know the ins and outs of IDEA. They know data and can review academic data for SPED but how will they help with timelines, processes and procedures?
- We do not feel that these sessions truly reflect the opportunity to gain the much needed information about this, but rather checking the boxes that you are required to check. There is really not any information provided that we did not already know from emails and other briefs released. Our concern is are our voices really being heard through this format and how will the response to the many, many questions that are being posed in this forum be shared?
- Why is TEA being so close lipped, they are going to have a plan released in 2 days?
- Budgets are being developed right now and we are not able to plan for or account for staffing needs. **YOU ARE NOT BEING SUPPORTIVE TO LEAs**
- TEA needs to talk with ESC Dyslexia service center consultants who have worked with parent groups, teachers, administrators and districts and have an expertise in the field of dyslexia. R10 has the state consultant and there has been no communication as far as I know with any dyslexia personnel. This group of highly trained individuals have not been recognized as a stakeholder in the group.
- The interaction between TEA and LEA was nonexistent in this meeting. We were read a scripted document and told no questions could be entertained. The face to face interaction, occurred among that could be facilitated at their district rather than travel to a centralized location
- **NEED TO HIRE THE STATE SPECIAL ED**
- **DIRECTOR** - We prefer someone to come from Texas with familiarity of law and processes
- The state special ed director needs to be from Texas.
- How will the agency prioritize the districts who are considered high needs?
- How will districts be prioritized for monitoring?
- Eggs all in one basket
 - Districts that have remained way above the 8.5 and continued to identify regardless of getting "in trouble" should be the last on the list to be monitored.
- Emphasis on supporting districts toward reflective practices (self identify growth areas) versus escalation remediation based on an arbitrary grading system
- Resentment
 - LEA's are feeling a little resentful at the implication that we are not implementing IDEA requirements
- Better services for kids
 - This seems like a box checking endeavor. Will it really increase quality of services for students?
- Creating a Positive Culture
 - Special education is already a heavy, compliance-based, litigious system that separates students with disabilities. Can we be creative and create a way of ensuring rights of these students while providing high-quality instruction for all? I say return to the drawing board, maybe look at some successful states who are doing a good job with this, and focus on building trust, creating positive culture, and supporting districts through appropriate funding and support. Just the name, "Escalation Team" contributes to an already negative connotation.
- District Blaming
- This all feels very much like the majority of Texas districts who are doing right by kids are being blamed for the actions of a very few districts/administrators.
- The fact that notes were not taken during the discussion part of this meeting seems to indicate that TEA is going through the motions of gathering "input" on a plan that is already decided.

- Bilingual Education
 - Bilingual Education inconsistencies contribute to this problem in our District. There are varied levels of language acquisition in our students that ultimately lead to referrals for language issues rather than disabilities. Consistent guidance and support for bilingual learners and educators in Texas needs to be systematic, practical, and culturally sensitive.
- Mental Health Support
 - Many students arrive at school with limited exposure to education and with traumatic background. We need help in serving these students so they get what they need in short-term intermittent supports so they do not become labeled as ED for reasons that can be addressed through proper counseling and supports available to all students.
- Resources
 - The money suggested to be spent on monitoring would be better spent on students. It is important to remember that the closer the money is to the students, the better services can be offered for those students.
- Escalation Team AKA School Improvement Team AKA PSPs
 - We are simply renaming a program that is being phased out and brought back in here. PSPs are now going to be for this Corrective Action Plan, What changed??????
 - LEAs are still having to cover that cost- what is the benefit?
- One-Size-Fits-All
 - What works for Houston ISD may not fit the bill for Small Town USA ISD.
- Dereliction of Duty
 - Bottom line: The PR nightmare created by the finger-pointing done through the media where politicians accuse teachers of "dereliction their duties" for following the rules established by the state agency is concerning.
- 3rd Party Vendors
- TEA is adding a LOT of people. Why would we need 3rd party vendors for technical assistance? I thought that's what region service centers were for - technical assistance.
- Escalation Team
 - It's clear USDE is not happy with Texas but Escalation is a harsh term to use with stakeholders.
- Money
 - Where's this money coming from. It's my understanding that TEA does not have money for this plan?
- Funding
 - Education is already underfunded. Where is this money coming from, and why would it be concentrated so far removed from avenues better suited to address student outcomes?
- Teacher Credentials
 - How does changing credentials impact identification? Our experience is that when there are changes to teacher credentialing makes everything more complicated and doesn't commonly improve services to students.
- Technical Assistance Vendors
 - What is this? Why outsiders? Why not use our Regions to support and train. They know us and have relationships, so learning can begin immediately.
- This process is frustrating. TEA sends two representatives to our region and we are hopeful that they can shed light on this process and hear some of our concerns directly. But, they instruct us at the beginning of the session that they cannot be involved in any of our feedback. That is frustrating and makes no sense.
- Perpetuates TEA's poor reputation. True Q&A session to give us guidance. Instructional coaching is needed.
- Again, 3rd party assistance when you have 38 additional staff members. Where is the financial assistance for our districts?

- Many people came today with the hopes of receiving guidance, insight and answers, however, because of the process no guidance on how districts need to prepare was provided.
- A tad frustrating.
- Turnaround time....
 - seems unrealistic. We need to be able to make plans for next year and we our hands are tied. We will not have enough time to prep for the 18-19 school year.
- This session
 - Was expecting to get more clarification/ chance to ask questions to TEA. Frustrating that it was only to discuss amongst each other and not get feedback from the source.
- Standardized definition of Educational Need.
 - Consider something like the process of implementation timelines like the HB 1842 timeline for district with IR needs.
- CONFUSION!!!!
- Once again everything is being done before regs are out- Typical of TEA
- Putting the cart before the horse.
- Hopefully, when the dust settles, we will get back to doing what is best for kids!
- What will the criteria be and type of assistance offered to LEA's identified.
- Jobs
 - LOL--how do we apply for the new positions being created? How do we apply to be a part of the escalation team.
- Escalation Team
 - What is a high need district? Is it a district that implemented push out and keep out strategies for special education identification or is it low SES low STAAR score districts? Both have high needs, but need different types of support.
- Technical Assistance Vendors
 - So would districts hire the vendors or is this a benefit that TEA would provide free of charge for the technical assistance. What type of technical assistance would be provided? What would they do?
- TEA should be more transparent of actions already taken. The PPT from today needs to be shared with Superintendents and Special Ed Directors, so they are able to address some concerns they are hearing in their districts.
- Time/staff/funds to meet the demands of this plan while continuing to serve the students identified.
- When exploring possible changes to teacher certification and training, administrator certification also need to be considered to include special education training (and more than special education law).
- We have no state regulations for 504! They need guidelines.
- Action Four simply sounds like more compliance monitoring. I don't see anything that supports increased outcomes for students.
- Give the LEAS all the guidelines to implement the corrections and give the districts a year to make changes and then monitor LEAS based on progress before we spend \$84 million!
- Monitoring activities under #1 & #4 are scheduled to be started BEFORE the criteria for #2 & #3 or complete. Does his mean that over time the monitoring focus will change to encompass what districts are doing under #2 & #3.
- How is the state going to support districts with funding for all the new assessment staff this is going to require?
- The cost of this five year plan is outrageous!
- Shame on the Feds for taking "fake news" and running with it before doing their own investigation.
- A CAP is needed BUT this plan needs major revisions. Especially if the goal is to improve services for students with disabilities. As proposed much time and resources will be expended that will have little to no impact on student learning.

- All students have a right NOT to be labled. Such was the reasoning behind RtI. I'm afraid many parents will be bitterly disappointed when special education doesn't make everything go smoothly for their child.
- How many times do we keep giving IEPs
- Maybe some of the money should be used to train general education teachers. There are some great resources that are neglected because of lack of training. This would benefit all students.
- This will take up our time and it will take time away from the students that we serve!!!!!!
- Where was this money to serve students??? We could use it to serve our students!!
- Our most vulnerable students will be neglected because of all of this.
- Give us the money and let us do what we need to do.
- where do we get Qualified diags
- Need to look at Tier 1 instruction
- Resources
- Where will the money come from to provide services for all identified students?
- Will we still be held accountable for the 1% cap for students taking STAAR Alt? This also could be a deterrent to districts meeting those student's needs in addition to the previously required 8.5% cap.
- What are the criteria for the districts that need more specific needs?
 - What's the punishment for the districts that don't comply? Will they be shut down? What if one of the reasons they were not able to comply was related to funding?
- Outcome: What is definition of the special education identification gap?
- Is TEA going to look at other states for guidance? Other states that have not had OSEP involved. If I've been informed correctly, Texas is one of the only states that has been involved in this type of intervention.
 - Reviewing input from these stakeholders, it is apparent that significant revisions to the original corrective action plan need to be made by TEA.
- Reviewing other states just might help Texas out of this mess
- Appendix A
 - \$84.5 million total costs. Where will this money be pulled from? Will LEAs current funding be pulled to pay for these corrective actions? Of this amount, it appears than \$0 will go directly to LEAs to pay for the mandates.
- Director of State and Federal Programs
- This entire process appears to be a very knee jerk reaction to a problem created by TEA and the Legislature, where the LEA's are expected to clean up the mess and deal with the consequences.
- Special Education : What are struggling learners?
- Director of State and Federal Programs
- Do Not hire more people. Use the money to help LEA's provide the services. Do Not look at this as a complete common cause but more as a specific cause based on the individual LEA's.
- Director of State of Federal Programs
- Is the idea of Urban vs. Rural even being considered. Rural Northeast Texas is drowning in staffing shortages and funding. When you look at the state demographers information regarding Northeast Texas poverty it is hurting the LEA's on many different levels and this action will only compound the issues already hurting us.
- School districts are committed to providing services and supports for all students in their care. Placing blame for political purposes serves no positive purpose in providing solutions.
- Funding
 - Funds allocated, as outlined in Appendix A, should not create a reduction in funding at the local level. In fact, funding should increase at the local level in both general education and special education to implement the corrective action necessary as a result of TEA's prior actions.