

Action Not Required

December 7, 2021

Dr. Henry Scott, Superintendent
Denison ISD 091903
1201 S Rusk Ave
Denison, TX 75020-6340
whscott@denisonisd.net

Subject: Cycle 2 Review Status Clarification and Update

Dear Dr. Henry Scott,

The purpose of this letter is to clarify your district of its status related to the special education Cycle 2 review and any findings identified as a result of data collected and reviewed during monitoring activities in accordance with the Individuals with Disabilities Education Act (IDEA).

Status of Compliance

After an internal document review, TEA has determined that **Denison ISD** received a 2020-2021 Cyclical Monitoring Report that may have contained confusing information regarding compliance standing and requirements for further action. The attached updated report corrects language on page 1, and if applicable in the Appendix.

Specifically, although individual instance(s) not meeting regulatory and/or statutory requirements during the review of LEA provided data were found, the LEA timely corrected those instance(s) prior to any letter of finding from the State being issued. Therefore, no further actions resulting from the LEA's cyclical review are required.

Should you have any questions regarding the cyclical review process and/or questions related to the updated report information, please contact the Office of Special Populations and Monitoring at (512) 463-9414.

Sincerely,

Jennifer Alexander
Interim Deputy Commissioner
Office of Special Populations and Monitoring
Texas Education Agency

cc: LEA Special Education Director
Executive Director, Region 10 Education Service Center
Special Education Contact, Region 10 Education Service Center

Enclosure



Cycle 2 Group 3

Dates: April 2021- June2021

TEXAS EDUCATION AGENCY 2020-2021 CYCLICAL MONITORING REPORT

Local Education Agency (LEA) Name: Denison ISD

CDN: 091903

Status: Complete – See attached letter and updated Appendix

INTRODUCTION

The Texas Education Agency (TEA) would like to extend appreciation to Denison ISD for their efforts, attention, and time committed to the completion of the review process.

The TEA has developed a monitoring approach that reviews compliance-based indicators while also looking for best practices. In commitment to the approach, the cyclical monitoring report will provide the results of the LEA's compliance review related to the Individuals with Disabilities Education Act (IDEA) and federal and state statutes, a summary of data related to Results-Driven Accountability (RDA), State Performance Plan (SPP), Significant Disproportionality (SD), and dyslexia program evaluation recommend targeted technical assistance and support for LEAs related to special education, and highlight best practices of LEAs that demonstrate success.

CYCLICAL MONITORING

The TEA conducts cyclical reviews of all LEAs statewide over six years. The purpose of cyclical monitoring is to support positive outcomes for students with disabilities and to determine compliance with special education regulations and dyslexia program regulations.

LEAs are required to submit artifacts and/or sources of evidence for compliance and promising practices review in the following areas:

- Child Find/Evaluation/FAPE
- IEP Development
- IEP Content
- IEP Implementation
- State Assessment
- Properly Constituted ARD Committees
- Transition

2020–2021 CYCLICAL REVIEW COMPLIANCE SUMMARY

On June 30, 2021, the TEA conducted a policy review of Denison ISD. On May 28, 2021, the TEA conducted a comprehensive desk review of Denison ISD. The total number of files reviewed for the Denison ISD comprehensive desk review was 24 files. The review found overall that 18 files out of 24

files were compliant. An overview of the policy review and student file review for Denison ISD are organized in the chart below by indicating the number of compliant findings within the reviewed file submissions related to the compliance area. Itemized details of these findings are in the appendix:

Compliance Area	Policy Review (# compliant of # reviewed)	Student File Review (# compliant of # reviewed)
Child Find/Evaluation/FAPE	19 of 19	24 of 24
IEP Development	5 of 5	22 of 24
IEP Content	3 of 3	23 of 24
IEP Implementation	21 of 21	24 of 24
Properly Constituted ARD	8 of 8	23 of 24
State Assessment	4 of 4	18 of 18
Transition	6 of 6	10 of 12

2020–2021 DYSLEXIA COMPLIANCE SUMMARY

The dyslexia monitoring process focuses on three-core elements: early identification and intervention, program of instruction, and parent notification. The TEA Department of Review and Support: Dyslexia Monitoring reviewed Denison ISD artifacts using a program evaluation protocol which is aligned to Senate Bill 2075 of the 86th Legislature, Texas Education Code (TEC) 38.003 (c-1), and 19 Texas Administrative Code (TAC) Chapter 74.28. The 2020-2021 school year results for Denison ISD are in the table below.

Areas of Implementation	Compliance Status
Dyslexia Procedures	Met Compliance
Parent Communication	Met Compliance
Screening	Met Compliance
Reading Instruments	Met Compliance
Evaluation and Identification	Met Compliance
Instruction	Met Compliance
Dysgraphia	Met Compliance
Professional Development and Training	Met Compliance
Progress Monitoring	Met Compliance

DATA SUMMARY OF RESULTS-DRIVEN ACCOUNTABILITY, STATE PERFORMANCE PLAN INDICATORS, AND SIGNIFICANT DISPROPORTIONALITY

The following supplemental data may be used to support development of the Strategic Support Plan (SSP) for continuous improvement and/or a Corrective Action Plan (CAP) if noncompliance is identified.

Year	Results-Driven Accountability (RDA) Determination Level	SPP Indicators 11, 12, 13 Compliance*	Significant Disproportionality
2020	DL 2—Needs Assistance	COMPLIANT	N/A

*Indicator 11: Child Find
Indicator 12: Early Childhood Transition
Indicator 13: Secondary Transition

2020-2021 COVID-19 IMPACT NARRATIVE

In the 2020-2021 academic year, Local Education Agencies (LEAs) were provided an opportunity to complete a COVID-19 impact narrative form documenting the practices incorporated to support Child Find and FAPE for students being served by special education programs during the COVID-19 pandemic.

2020-2021 CYCLICAL REVIEW PARENT, TEACHER, ADMINISTRATOR INTERVIEWS/SURVEY

Staff and Family Surveys

On June 30, 2021, the TEA Review and Support team received 115 surveys.

Survey participants were as follows: 16 administrators, 51 general education teachers, 24 special education teachers, 6 evaluation staff, and 18 parents/family/caregivers.

The Review and Support surveys focused on the following review areas:

Almost 50 percent of participants felt they receive good communication from their school. The best way the school or district provides information about trainings, online pieces of training, support groups, and other available resources concerning special education services include notices sent home, emails, and the school website.

Most parent/family member participants felt they would be most comfortable attending special education information sessions at the school campus or the education service center.

75% of participants indicated they have a clear understanding of special education services.

The most selected areas of special education the participants would like to know about included the following networks:

- Child Find Evaluation and ARD Support Network
- School, Family, and Community Engagement network
- Inclusion in Texas network
- Texas Statewide Leadership for Autism Training
- Tiered Interventions using Evidenced-Based Research (TIER)
- Small and Rural Schools Network

The majority of participants felt the training to help meet students' needs with disabilities was classroom management and Special Education State Assessment Determination.

25% of participants felt frequent opportunities to collaborate with related service providers were available. However, another 25% disagreed that there are regular opportunities for collaboration with related service providers.

The obstacles concerning student's special education programming and services were reported as:

- Assuring students receive accommodations and/or modifications as outlined in the IEP.
- Scheduling ARD meetings
- Timely updates on student progress
- Knowledge of available services and programs

47% of participants agree with the importance of including students' interests/life goals in the transition process, with almost 40% strongly agreeing.

The majority of participants indicated they chose the in-person learning model. Most participants also reported that remote learning for students receiving special education was ineffective.

COVID

Approximately 45 percent of participants felt that during COVID school closures/remote learning, the Emergency Contingency Plan effectively improved student progress.

During COVID closures, the top three ways indicated that teachers provided support to students with moderate to severe disabilities were:

- Teachers provided supports needed for students to be successful.
- Teachers made regular contact with students and parents to meet academic and emotional needs.
- Individualized support.

Participants indicated that during COVID school closures/remote learning, they needed professional development on how to teach virtually and the use of virtual platforms.

Participants indicated that during COVID school closures/remote learning strategies, the district's top two supports that did not work well for students with disabilities were shared device per family and online submission of assignments.

More than 60% of participants indicated that they agreed that school staff worked with parents/guardians in addressing severe behavior and work refusal.

This survey was approved by the Texas Education Agency's data governance board. Participation in this survey was both voluntary and anonymous. No data was collected identifying a name so that individual responses cannot be linked to any respondent. Participants were given the option to stop the survey at any time.

Strengths

Based on results of the policy review and student file review, along with data collected from LEA staff and family surveys, the Review and Support team identified the following strengths for Denison ISD:

- The documentation of the schedule of services in the reviewed files provides a clear picture of the students' services.
- Denison ISD's commitment to family engagement is evidenced by their practice of giving families more than 5 days' notice for ARD meetings and the high attendance rates of parents/guardians at ARD meetings.
- Consistently, remote learning contingency plans were discussed and documented within the students' IEPs.
- Evaluation timelines were consistently compliant.
- A policy review revealed all policies in the Legal Framework were updated and compliant.

Considerations

Based on results of the policy review and student file review, along with data collected from LEA staff and family surveys, the Review and Support team identified the following considerations for Denison ISD:

- Consider additional training for Transition Planning to ensure activities are completed in a meaningful and collaborative manner. Transition Planning should start before the student's 14th birthday.
- Consider reviewing internal practices for scheduling annual ARD meetings. Reschedule meetings as needed without the risk of not meeting timeline requirements, and ensure all required members are present to convene a Properly constituted ARD.
- Consider additional training on PLAAFP statement development and how to use PLAAFP statements to develop appropriately ambitious measurable annual goals.

Technical Assistance

As a result of monitoring, the TEA has identified the following technical assistance resources to support Denison ISD engaging in **universal** support as determined by the RDA performance level data and artifacts within the compliance review:

Topic	Resource
IEP Development	Technical Assistance: IEP Development . The IEP Development document is part of an ongoing series to provide technical assistance to LEAs from the Texas Education Agency.

Transition	<p>The Student-Centered Transitions Network: The Student-Centered Transitions Network builds collaborative infrastructures among students, families, schools, LEAs, and communities. The SCTN aims for all students with disabilities to be actively involved in planning, communicating, and evaluating progress in meeting their transition goals from early childhood through high school graduation and post-secondary readiness.</p> <p>The Garrett Center - Administrator Resources: The Garrett Center coordinates statewide activities designed to build collaborative infrastructures among students, families, schools, districts, and communities to equip all students with disabilities to be actively involved in planning, communicating, and evaluating progress in meeting their transition goals from early childhood through high school graduation and post-secondary readiness. Linked are resources specific to fulfilling administrator responsibilities.</p>
IEP Content	<p>Admission, Review and Dismissal (ARD) 101. This virtual workshop reviews the requirements of an admission, review, and dismissal (ARD) committee meeting, including membership, participation, and components.</p>
Child Find Evaluation and ARD Support Network	<p>Child Find, Evaluation and ARD Support Network: The Child Find, Evaluation and ARD Supports Network assist LEAs by providing resources and training that are aligned with implementing effective Child Find practices, conducting comprehensive evaluations, and practicing collaborative admission, review, and dismissal (ARD) committee processes that lead to a free appropriate public education (FAPE) for students with disabilities.</p>
School, Family, and Community Engagement network	<p>School, Family, and Community Engagement Network (SPEDTex) : The School, Family, and Community Engagement Network provides resources and professional development to build the capacity of educators to work collaboratively with families and community members in supporting positive outcomes for students with disabilities. As part of the School, Family, and Community Engagement Network, SPEDTex (the Texas Special Education</p>
	<p>Information Center) optimizes information and responds with technical assistance in a succinct and useful format that is user friendly, culturally responsive, and accessible to all individuals. All parent resources connected to the Special Education Strategic Plan will either be housed or linked on the SPEDTex website.</p>
Inclusion in Texas network	<p>The Inclusion in Texas network: The Inclusion in Texas Network is working to promote a statewide culture of high expectations for students with disabilities and significantly improve academic and functional outcomes for students served by special education. The network assists LEAs build capacity to develop and appropriately implement instructional programs that provide meaningful access to inclusive environments and grade-level standards, where appropriate.</p>

Texas Statewide Leadership for Autism Training	Texas Statewide Leadership for Autism Training (TSLAT) : Texas Statewide Leadership for Autism Training (TSLAT) increases LEAs' knowledge, understanding, and implementation of evidence-based practices that ensure the academic, functional, and behavioral needs of students with autism are met. TSLAT provides access to training, technical assistance, support, and resources for educators who serve students with autism. The TSLAT website includes online courses (some in Spanish), webinars, information about opportunities for deeper learning, a video library, and more.
Tiered Interventions using Evidenced-Based Research (TIER)	Tiered Interventions using Evidence-Based Research (TIER) : The Tiered Interventions using Evidence-based Research (TIER) network is developing comprehensive and coherent trainings and resources for evidence-based intervention practices across the state. The network strives to increase LEA and ESC capacity to develop and implement an effective, integrated, comprehensive framework for intervention grounded in differentiated instruction and aligns the systems that are fundamental for all students' academic, behavioral, and social achievement.
Small and Rural Schools Network	Small and Rural Schools Network : This network strives to build the capacity of small and rural LEAs to provide a more equitable level of access for students with disabilities in these communities. The network will develop state-level infrastructures, resources, and professional development to support LEAs who face unique challenges, such as resource limitations and geographic remoteness.

Findings of Noncompliance

A finding is made when noncompliance is identified with the Review and Support report findings, SPP notification, and/or individualized education program (IEP) requirements. Noncompliance that is systemic in nature must be included in a comprehensive corrective action plan (CAP) with action steps to address each of the noncompliance findings. ***When noncompliance has been identified as part of this cyclical review, Denison ISD will receive formal notification of noncompliance in addition to this report.***

The TEA Department of Review and Support will further advise the LEA on the corrective action process, if applicable.

The TEA follows procedures for the correction of noncompliance consistent with federal guidelines (OSEP Memo 09-02.)

Before the TEA can report that noncompliance has been corrected, it must first verify the LEA:

- Has corrected each individual case of noncompliance (Prong 1); and
- Is correctly implementing the specific regulatory requirements (i.e., subsequently achieved 100% compliance) (Prong 2).

The TEA is required to monitor the completion of a corrective action plan if any noncompliance is discovered. The corrective action plan must be designed to correct any and all areas of noncompliance ***as soon as possible, but in no case later than one year from the date of notification.***

Corrective Action Plan (CAP)

The LEA will develop a CAP to address any items identified as noncompliance in this summary report. An approved form for the CAP can be accessed on the Review and Support website or in the resources located in Ascend Texas.

The LEA must submit the CAP in Ascend within 30 school days from the date of this report and/or formal notification of noncompliance. The TEA will review the CAP submitted by the LEA for approval. If the TEA determines that a revision(s) is necessary, the LEA will be required to revise and resubmit. The Review and Support team will contact the LEA to provide notification when the CAP has been approved.

Individual Correction

The educational agency has **60 school days** from the date of this summary report to correct all identified findings of noncompliance for individual students, unless noted otherwise in the report.

2020–2021 DYSLEXIA PROGRAM EVALUATION FINDINGS

As a result of the program evaluation review, the TEA Department of Review and Support: Dyslexia Monitoring has identified the following strengths, considerations, and technical assistance recommendations for Denison ISD.

Areas of strength include alignment in procedures and practice of progress monitoring and tracking of accommodation.

Your current dyslexia program is in alignment with state and federal mandates. The following resources are recommended for reflection of current dyslexia program to strengthen internal systems and procedures.

The following technical assistance resource(s) are recommended for Denison ISD.

Topic	Resource
TEA Review and Support	Dyslexia Monitoring
TEA Special Education	Dyslexia and Related Disorders
Dyslexia: TEA Professional Learning Course	Tea Learn Dyslexia Modules

Corrective Action

The TEA reviews data collected from the dyslexia program evaluation to ensure compliance with federal and state regulatory requirements. In accordance with Senate Bill 2075 of the 86th Legislature, TEC 38.003 (c-1), and 19 TAC 74.28 regarding noncompliance identified through the dyslexia program evaluation, a finding of noncompliance is identified by the citation (i.e., program or process) that is violated.

Dyslexia Performance Plan (DPP)

If noncompliance is identified, the LEA is required to demonstrate correction of all noncompliance in the Dyslexia Performance Plan (DPP). This tool guides LEAs through a continuous improvement process. It addresses areas of growth that will positively impact students with dyslexia or other related disorders. LEAs should complete the DPP no later than 120-days after receiving notification of noncompliance. This document will be provided by the TEA or can be accessed in the resources section of the [Review and Support website](#).

LEA ACTIONS

Timeline for Strategic Support Plan (SSP) and/or Corrective Action Plan (CAP) Below:

Required Actions	Submission Due Date	Completion Due Date	Support Level	Communication Schedule
SSP	12/18/2020		Universal	60 days
CAP	NA			
DPP				

For more information about cyclical monitoring and the Differentiated Monitoring and Support process, please visit the [Review and Support website](#)

**LEA may have previously identified corrective actions in addition to findings in this report.

REFERENCES

[Differentiated Monitoring and Support System](#)

[Review and Support General Supervision Monitoring Guide](#)

[State Performance Plan and Annual Performance Report and Requirements](#)

[Results-Driven Accountability Reports and Data](#)

[Results-Driven Accountability District Reports](#)

[Results-Driven Accountability Manual](#)

APPENDIX

Properly Constituted ARD

Student File Review

Updated clarification 12/2021

LEA corrected the individual student folders prior to any issuance of findings by the State. No additional corrective actions are required.

Item	IDEA Citation	TEC/TAC Citation	Evidence of Findings	Required Actions	Must Be Addressed in CAP
PCA7	34 CFR §300.321(a)	TAC §89.105(c)(1)(D)	Student folder did not meet requirements upon initial review.	None - Individual correction completed prior to issuance of findings.	No CAP required

IEP Content

Student File Review

Updated clarification 12/2021

LEA corrected the individual student folders prior to any issuance of findings by the State. No additional corrective actions are required.

Item	IDEA Citation	TEC/TAC Citation	Evidence of Findings	Required Actions	Must Be Addressed in CAP
IC1	34 CFR §300.324(b)		Student folder did not meet requirements upon initial review.	None - Individual correction completed prior to issuance of findings.	No CAP required

IEP Development

Student File Review

Updated clarification 12/2021

LEA corrected the individual student folders prior to any issuance of findings by the State. No additional corrective actions are required.

Item	IDEA Citation	TEC/TAC Citation	Evidence of Findings	Required Actions	Must Be Addressed in CAP
ID2	34 CFR § 300.320(a)(1)		Student folder did not meet requirements upon initial review.	None - Individual correction completed prior to issuance of findings.	No CAP required

Transition

Student File Review

Updated clarification 12/2021

LEA corrected the individual student folders prior to any issuance of findings by the State. No additional corrective actions are required.

Item	IDEA Citation	TEC/TAC Citation	Evidence of Findings	Required Actions	Must Be Addressed in CAP
TR1	34 CFR §300.320(b)	TAC 89.1055(j); TEC §29.0111	Student folder did not meet requirements upon initial review.	None - Individual correction completed prior to issuance of findings.	No CAP required
TR2	34 CFR §300.321(a)		Student folder did not meet requirements upon initial review.	None - Individual correction completed prior to issuance of findings.	No CAP required