

Action Not Required

December 7, 2021

Dr. Burnie L Roper Jr, Superintendent
Lackland ISD 015913
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San Antonio, TX 78236-1244
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Subject: Cycle 2 Review Status Clarification and Update

Dear Dr. Burnie L Roper Jr,

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 **Lackland 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 20 Education Service Center
Special Education Contact, Region 20 Education Service Center

Enclosure



Cycle 2 Group 1

Dates: October – December 2020

TEXAS EDUCATION AGENCY 2020-2021 CYCLICAL MONITORING REPORT

Local Education Agency (LEA) Name: Lackland ISD

CDN: 015913

Status: Complete – See attached letter and updated Appendix

INTRODUCTION

The Texas Education Agency (TEA) would like to extend appreciation to Lackland 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 and will 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 December 18, 2020, the TEA conducted a policy review of Lackland ISD. On December 18, 2020, the TEA conducted a comprehensive desk review of Lackland ISD. The total number of files reviewed

for the Lackland ISD comprehensive desk review was 21. The review found overall that 19 files out of 21 files were compliant. An overview of the policy review and student file review for Lackland 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	21 of 21
IEP Development	5 of 5	19 of 21
IEP Content	3 of 3	21 of 21
IEP Implementation	21 of 21	21 of 21
Properly Constituted ARD	8 of 8	21 of 21
State Assessment	4 of 4	21 of 21
Transition	6 of 6	5 of 5

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 1—Meets Requirements	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 Survey

On December 18, 2020, the TEA Review and Support team received 66 surveys during the comprehensive desk review. The Review and Support surveys focused on the following review areas:

Eighty three percent of participants felt they receive sufficient communication from their school. The best way the school/district provides information about trainings, online trainings, support groups and other available resources concerning special education services is via email followed by notices sent home, phone calls and the school website.

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

All 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 were the Inclusion in Texas Network and the Texas Sensory Support Network (TxSSN).

The majority of participants felt training in to help meet the needs of students with disabilities was effective or somewhat effective.

Fifty three percent of participants felt there were frequent opportunities to collaborate with related service providers and almost forty percent felt there was not frequent opportunities to collaborate with service providers.

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

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

All participants agree with the importance of including students interests/life goals in the transition process with 60% of participants strongly agreeing.

Almost 80% of participants felt that during COVID school closure/remote learning, the Emergency Contingency Plan was effective in supporting student progress.

During COVID closures, support to students with moderate to severe disabilities was provided using the following methods:

- Teachers provided supports needed for students to be successful
- School staff made regular contact with students and parents to meet academic and emotional needs
- Modified work and provided individualized support

Participants indicated that during COVID school closure/remote learning, further professional development. Comments also indicated that needed PD has not yet been provided.

Most participants indicated they chose an in-person learning model. Those participating in remote learning indicated that the students did not interact with teachers consistently. They reported that remote learning for students receiving special education was "somewhat effective" or "ineffective."

Participants indicated that during COVID school closure/remote learning the LMS platform (such as Schoology, Canvas or Google Classroom) and online submission of assignments were strategies used to support instructional continuity that were not effective for students with disabilities.

The majority of participants indicated that they agreed or strongly 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 Lackland ISD:

- All reviewed special education policies and practices follow federal and state requirements and are linked to the Legal Framework.
- Present levels of academic achievement and functional performance are generally robust and include information/data from multiple sources.
- When determining a student’s eligibility for special education and related services, ARD committees consider multiple data sources. Outside evaluations are appropriately considered by the evaluation team. ARD committee members are aware of related service options and refer students for these services when appropriate.
- The ARD committee considers and addresses least restrictive environment for each student based on the student’s needs.

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 Lackland ISD:

- Review guidance and provide staff training related to IEP goal development, including writing objectives and benchmarks:
 - Goals should be standards-based, but student-specific; and
 - Goals should be based on student’s needs due to disability and accessing general education curriculum.
- Review guidance and provide training on developing student-specific transition plans with student-specific goals in education/training, employment, and independent living skills.

TECHNICAL ASSISTANCE

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

Topic	Resource
IEP Goal Development	<p><u>Technical Assistance: Individualized Education Program (IEP) Development</u>: A technical assistance guidance document intended to support implementation of services for students with disabilities. This guide focuses on IEP development and includes information on writing PLAAFPs and goals.</p> <p><u>Individual Education Program (IEP) Annual Goal Development</u>: A question and answer document that guides the reader through annual goal development.</p> <p><u>The National Center on Intensive Intervention</u>: A guidance document on strategies for setting high-quality IEP goals.</p>
Transition Planning	<p><u>The Student-Centered Transitions Network</u>: This 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 postsecondary readiness.</p> <p><u>Texas Transition Online</u>: This online module provides educators in Texas with an understanding of the transition process components, including transition assessments and compliance issues in federal and state law and rule.</p> <p><u>National Technical Assistance Center on Transition (NTACT)</u>: A resource supported by the Office of Special Education Programs (OSEP) and Rehabilitation Services Administration (RSA). Resources related to transition planning, graduation, post-school success, and data analysis and use are linked in this resource. Effective practices for transition are delineated into evidence-based, research-based, promising practices, and unestablished practices.</p>
Inclusion in Texas Network	<p><u>The Inclusion in Texas network</u>: 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 Sensory Support Network (TxSSN)	Texas Sensory Support Network: The Texas Sensory Support Network (TxSSN) ensures the provision of support to infants, toddlers, children, and youth with sensory impairments, their families, and the professionals who serve them. This network provides information and strategies for development of communication, mobility, tactile skills, and environmental adaptations. Additionally, TxSSN addresses diagnosis, evaluation, and educational programs for services to students in their home communities in support of the comprehensive statewide education plan for this student population.
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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, Lackland ISD will receive formal notification of noncompliance in addition to this report.***

The TEA Division of Special Education Monitoring 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.

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	N/A		Universal	Not applicable
CAP	Not Applicable	Not Applicable		Not applicable

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

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
ID3	34 CFR §300.320(a)(2)(i)		Student folder did not meet requirements upon initial review.	None - Individual correction completed prior to issuance of findings.	No CAP required
ID6	34 CFR §300.320(a)(2)(ii) 34 CFR §300.320(a)(6)	TAC §89.1055(b)	Student folder did not meet requirements upon initial review.	None - Individual correction completed prior to issuance of findings.	No CAP required