Special Education Monitoring Evaluation
FINAL REPORT

Prepared for:
Texas Education Agency

September 2022

Submitted By:
Gibson Consulting Group, Inc.
1801 South Mopac Expressway, Suite 270
Austin, Texas 78746
+512.328.0884
www.gibsonconsult.com

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

Table of Contents

GIBSON

AN EDUCATION CONSULTING & RESEARCH GROUP

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

Chapter 1: Introduction

Background

The State of Texas provides Special Education programs and services to approximately 500,000 students with disabilities through 1,216 Local Education Agencies (LEAs). As the U.S. Supreme Court proclaimed in Endrew F. v. Douglas County School District RE-1, the Individuals with Disabilities Education Act (IDEA) demands that a child with a disability who requires special education programs and related services be offered an appropriately ambitious educational program that is "reasonably calculated to enable a child to make progress appropriate in light of the child's circumstances." Progress against this goal has been challenging, as performance of students with disabilities has lagged behind those of all students. Figure 1 presents 2019 (pre-COVID-19 pandemic) percentages of students approaching grade level on the State of Texas Assessments of Academic Readiness (STAAR) for reading and math – for students with disabilities and for all students combined.

Figure 1. STAAR Reading and Math Performance, Approaching Grade Level, Students with Disabilities and All Students, 2019 (pre-COVID-19 pandemic)
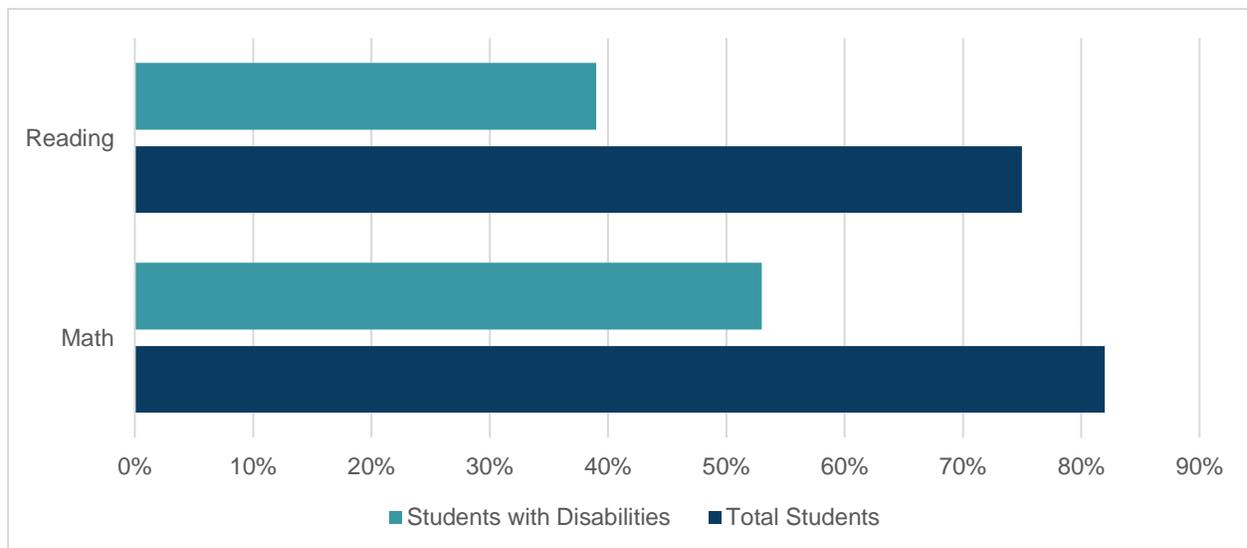
Source. Texas Education Agency Texas Annual Performance Reports (TAPR), 2021

In January 2018, Texas also became subject to a corrective action plan by the U.S. Department of Education's Office of Special Education Programs (OSEP). This corrective action required the Texas Education Agency (TEA) to build a new monitoring system to address concerns of students being inappropriately denied services from special education programs and related services. Denial of services was an unintended and unexpected consequence of a prior state accountability mechanism that lowered LEA special education accountability ratings if more than 8.5 percent of its students were served in special education.

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

To work towards these important goals of improved student achievement and full compliance with IDEA, TEA developed a Strategic Plan for Special Education. This plan established a new Review and Support unit with the following four major responsibilities:

1. Monitor LEA's compliance with federal and State statutes using a risk assessment index and holistic student-centered practices;

2. Provide targeted technical assistance and support for LEAs related to special education;

3. Escalate support for LEAs experiencing significant challenges; and,

4. Highlight those LEAs that demonstrate clear success.

The purpose of this evaluation was to review the monitoring processes established by TEA and evaluate TEA's implementation of these processes over a multi-year period. The evaluation also addressed specific questions asked by TEA related to its progress on the Special Education Strategic Plan. This is the first annual report on the evaluation. The evaluation was conducted by Gibson Consulting Group, Inc., and its subcontractor, the American Institutes for Research (AIR), referred to throughout this report as the Evaluation Team.

Executive Summary

Over the past four years, TEA has achieved major accomplishments towards implementing a more effective and efficient monitoring system to review LEA implementation of the Individuals with Disabilities Education Act (IDEA), special populations, federal and state statutes using a risk assessment index, and holistic student-centered practices. These are discussed briefly below.

- **New philosophy** – a transformational change in TEA's monitoring philosophy is already apparent, based on the assessment of the Evaluation Team and the words expressed by LEA representatives. The Agency is successfully transitioning from a "watchdog" program to one of "continuous improvement," being directly supportive of LEA efforts to improve compliance and student achievement. Compliance monitoring has been strengthened, and compliance exception rates are higher, but both LEA staff and Department of Review and Support (R&S) staff appreciate the focus on helping LEAs improve.

- **New monitoring approach** – the entire monitoring system procedural documentation has been re-written and implemented, including the Differentiated Monitoring and Support (DMS) Guide, the Desk Review Rubric, and Desk Review Operating Procedures.

- **More efficient** – TEA's monitoring system is more efficient due primarily to the recent implementation of the *Ascend* information system. This system supports the online posting of information by LEAs, online entry of compliance assessments, and an easily navigable platform to view LEA information and monitoring status. More system functionality and other enhancements are planned. Other TEA activities support more efficient practices for LEAs, such as advance notice of upcoming monitoring activities, and structured communications throughout the monitoring process.

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

- **More program-experienced staff** – all R&S Specialists are program-certified, placing the R&S unit in a better position to evaluate compliance and to help LEA's address compliance concerns.

- **High quality work** – based on the implementation fidelity evaluation, the Evaluation Team agreed with more than 96.7 percent of the compliance determination decisions made at the compliance indicator level.

- **More controlled** – beginning in FY 2021, TEA now selects the sample of student Individualized Education Program (IEP) files for compliance testing; in prior years LEAs selected the sample based on criteria provided by TEA. This minimizes the risk of LEAs "cherry-picking" files for compliance testing.

- **More stakeholder engagement** – TEA now has six formal stakeholder groups involved in the planning and vetting of monitoring decisions and initiatives.

    1. Continuing Advisory Committee (CAC) for Special Education

    2. Texas Continuous Improvement Steering Committee (TCISC)

    3. Special Education Parent Advisory Committee (SEPAC)

    4. The Advocacy Roundtable

    5. Special Education Directors Council (SEDC, also referred to as the Panel)

    6. Small and Rural Schools Network

- **LEA Self-Assessment** – the introduction of the LEA self-assessment has also engaged LEAs in the self-identification of challenges and improvement opportunities in their special education programs. LEA staff interviewed during this evaluation commented on the benefits of this process to their understanding of their Special Education Program.

- **Recognition and promotion of best practices** – in addition to identifying compliance exceptions and technical assistance needs, the desk review process involves the recognition of best practices applied by LEAs, which are listed in the desk review final report. Technical assistance links are also provided in desk review reports, pointing LEAs towards best practices to improve compliance and student performance.

- **Education Service Center Liaisons** – Special Education liaisons, employed by Education Service Centers (ESCs) and funded by TEA, provide individualized technical assistance, training, coaching, and implementation support to LEAs that is aligned to monitoring outcomes. Quarterly meetings afford ESC and TEA staff structured opportunities to examine the unique needs of LEAs across the State.

- **Differentiated Monitoring and Support (DMS) Data Validation** – automates many of the monitoring management activities, including the annual updating of the list of LEAs to be monitored and the automatic assignment of LEAs for monitoring activities. The DMS Data Validation also

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

ranks campuses for on-site visits, generates monitoring reports, and analyzes results from the monitoring system based on department-wide metrics.

Other monitoring initiatives are coming online, including the Technical Assistance Dashboard, the Dyslexia program evaluation available on *Ascend*, and the continued enhancement of a TEA Quality Rubric. The Technical Assistance Dashboard will be networked to the *Ascend* Texas application to align prioritized areas to a wide range of targeted technical assistance to support improved compliance outcomes and student performance. By using the Quality Rubric as a guide, LEAs will be able to increase their fidelity of implementation of federal and state requirements, and track their improvement from minimum compliance to best practice over time.

In addition to the above achievements, this evaluation resulted in affirmative answers to all questions posed by TEA. While references to the areas are made throughout this report, the following provides summary responses (in italics) to the evaluation questions, which are grouped under thematic questions.

Does the Department of Review and Support meet the requirements of the 2018 Special Education Strategic Plan?

1. Did TEA develop a standardized process for conducting reviews and monitoring visits, including development of documentation and reporting templates to be used?

    Yes. TEA developed the Differentiated Monitoring and Support Guide, the Desk Review Rubric, Desk Review Operating Procedures, and planning and communication protocols for LEAs, among other documents discussed in this report, to support a standardized process for conducting desk reviews. Standard reporting templates are also used to present the results of desk reviews to LEAs and the general public.

2. Does the Review and Support team monitor LEAs related to IDEA and federal and State statutes using a risk assessment index and holistic student-centered practices, and to what extent?

    Yes. TEA uses a risk assessment index to evaluate risk levels of LEAs based on Results Driven Accountability (RDA). Policy compliance with federal requirements is performed by TEA Specialists using the "Legal Framework for the Child-Centered Special Education Process," an online platform managed by ESC Region 18. The review of student IEP files as part of the desk review process also provides evidence of student-centered practices.

3. To what extent does the Review and Support team make connections to targeted, technical assistance and support for LEAs related to special education?

    Technical assistance needs are identified in the desk review report, similar to the prior year.

    100% of desk reviews sampled included technical assistance opportunities

    2.9 = Average number of technical assistance opportunities per LEA

    Based on interviews with TEA R&S staff, additional technical assistance needs – beyond the report – may be identified and shared informally by R&S Specialists and managers during the LEA exit

conferences and other communications throughout the desk review (e.g., discussions regarding Strategic Support Plans and Corrective Action Plans). LEA interviews confirmed this occurrence. The Agency is also close to implementing a Technical Assistance Dashboard, which should exponentially expand LEA access to technical assistance.

4. To what extent does the Review and Support team escalate support for LEAs experiencing significant (compliance) challenges?

   Based on interviews with R&S staff, the need to escalate support does not occur frequently (0 to 1 instances per Specialist per desk review group on average). However, this has increased since FY 2021 due to the increase in the compliance exception rate. The initial review begins with a discussion among the R&S managers, then, as needed, instances or concerns are escalated to the Compliance Review Team for cross team review, discussion, and determinations. In rare occasions, the TEA Legal Department may become engaged for consultation and support. The vast majority of LEA compliance challenges are addressed by the R&S Specialists and managers without the need to escalate.

5. Does the Review and Support team highlight LEAs that demonstrate clear success, and to what extent?

   Yes. LEA successes (best practices) are identified in the desk review reports as applicable.

   100% of desk reviews sampled included LEA successes

   2.75 = Average number of noted successes (best practices) per LEA

   Similar to technical assistance, additional LEA best practices may be acknowledged informally by R&S Specialists and communicated to them during the exit conference or other communications during the desk review. LEA interviews confirmed this occurrence.

Does the monitoring system developed by TEA meet the requirements of the Special Education strategic plan?

6. Does TEA's monitoring system align with TEA's Special Education Strategic Plan and include:

   a. Quantitative data points such as disability indicator(s) *Yes. Results Driven Accountability (RDA) data and LEA profile data are used to meet this requirement.*

   b. Specific strategies or interventions listed in student IEPs.

      Yes. Student IEP information is evaluated by TEA monitoring staff for compliance, as well as for identifying technical assistance needs. This assistance could lead to the improvement of student achievement through the development of new strategies or interventions by LEAs.

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

    c.   Student achievement.

       Yes. The RDA is used to meet this requirement.

    d.   LEA staffing.

       Yes. Several compliance indicators (e.g., PCA5, PCA6, ISPR31, ISPR45, PR30, and PR39) address various certified staff requirements dictated by regulation or statute.

    e.   Local policies and procedures.

       Yes. This is achieved through the Legal Framework for the Child-Centered Special Education Process, an online platform managed by ESC Region 18 and used by TEA Program Specialists to evaluate policy compliance.

    f.   State and federal compliance and performance indicators?

       Yes. The Desk Review Rubric is applied during the desk review process to evaluate compliance with federal (and State) statutes. The RDA and LEA profile are used to meet the requirement for Special Education performance indicators.

7.   Does TEA's monitoring system align with TEA's Special Education Strategic Plan and include qualitative indicators such as anonymous survey and interview results collected from educators and parents?

    Yes. TEA annually surveys LEAs to capture information on their expectations and perceptions across several performance domains. TEA formally receives input from the Special Education Parent Advisory Council through its stakeholder engagement process, and conducts parent surveys through its desk review process.

Since the inception of the Special Education Strategic Plan and throughout the pandemic, TEA has been designing, building, and performing monitoring activities under the new process simultaneously. Many other operational designs and *Ascend* developments have also been identified for future improvements. It is important that this Evaluation Report be read in this context.

Evaluation Objectives and Approach

The objectives of this evaluation were to review the new monitoring system and related processes, and evaluate its implementation fidelity and progress. In addition to the evaluation questions posed by TEA that are presented above, this evaluation also addressed the following questions:

▪   What are the processes and systems being put in place?

▪   What roles and responsibilities are changing?

▪   What staff and other resources are being dedicated?

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

- Are sufficient data captured to monitor compliance and performance?

- Are TEA staff applying procedures consistently?

- How do LEAs perceive the quality of support to improve compliance and student performance?

- What measurable outcomes demonstrate improvement in compliance and performance?

- How can TEA improve the quality of its Monitoring Program?

- How can TEA improve the implementation of its plan?

The scope of the evaluation focused on activities of the TEA Department of Review and Support unit, the area primarily responsible for monitoring. Special emphasis was placed on the most significant monitoring effort of R&S – the desk review process.

The Evaluation Team performed five major tasks to achieve the project objectives. These are discussed briefly below.

Task 1: TEA R&S Monitoring System Definition

This task involved the collection of extant data from TEA, including the Special Education Strategic Plan, the R&S organizational chart, R&S job descriptions, monitoring procedures and protocols, information system descriptions, sample monitoring reports, implementation progress reports, and operating statistics. This information was reviewed to establish a baseline understanding of the new monitoring system and its level of implementation.

Using the organizational chart received in Task 1, the Evaluation Team identified R&S leadership and staff positions for interviews to learn more about the monitoring processes, their level of implementation, and successes and challenges experienced.

Based on the information collected through the data provided and interview results, process maps were developed for cyclical and targeted desk reviews. As-is process maps were developed for each type of review, depicting the current processes and tools applied to conduct a desk review. These maps were validated by R&S leadership before additional analysis was conducted.

Task 2: Conduct Evaluation of TEA Desk Review Implementation

The process maps developed under Task 1 were analyzed to identify opportunities for streamlining, improved controls, and additional technology opportunities. The maps were also used in case study interviews with R&S Specialists to evaluate the implementation fidelity of the desk review process. These results appear in Chapter 4 of this report. Task 2 also involved the development of a preliminary assessment and the determination of responses to TEA's evaluation questions.

Task 3: Conduct Evaluation of TEA Desk Review Implementation

The Evaluation Team evaluated the implementation fidelity of the desk review process at the macro and micro levels. Information obtained from TEA interviews helped determine the level of implementation fidelity

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

at the desk review process level, focusing on the major desk review activities. To evaluate implementation fidelity at the compliance assessment levels, the Evaluation Team selected a sample of cyclical and targeted desk reviews conducted by R&S during Fall 2021 (Cycle 3, Group 1), and repeated the compliance testing performed at the indicator level by TEA. This work supported the evaluation of implementation fidelity in the way R&S staff applied decision rules for determining compliance at the indicator level base. The Evaluation Team was provided read-only access to *Ascend*, the information system used by R&S to review student IEP files and conduct the LEA compliance assessment. Additional information and the results of this work appears in Chapter 5 on page 45 of this report.

Task 4: LEA Data Collection

Interviews were conducted with district and campus level positions for a sample of LEAs to capture their perspectives on the new monitoring system at TEA at its implementation progress. The Evaluation Team developed interview guides which were approved by TEA prior to their use. Additional information about the LEA data collection process and results appears in Chapter 3 on page 15 of this report.

Task 5: Recommendations and Reporting

Recommendations for improvement were developed for TEA's consideration. These recommendations and supporting information appear in Chapter 6 of this report. A draft report that incorporated all aspects of work by the Evaluation Team was submitted to TEA on August 31, 2022, and the final report was delivered on September 30, 2022.

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

Chapter 2: Background

This Chapter presents a profile of Texas Special Education, a description of the events and plans that led to the development of a new monitoring system at TEA, and background information regarding the elements of the plan, changes at TEA, and recent operating statistics.

Texas Special Education Profile

Texas has experienced significant growth in the number of students with disabilities over the past decade. As shown in Figure 2, student counts increased from 439,677 in 2011-12 to 604,973 in 2020-21, an increase of 37.6 percent. Most of this growth (26.7 percent) occurred in the past five years.

Figure 2. Texas Number of Students with Disabilities, 2011-12 to 2020-21
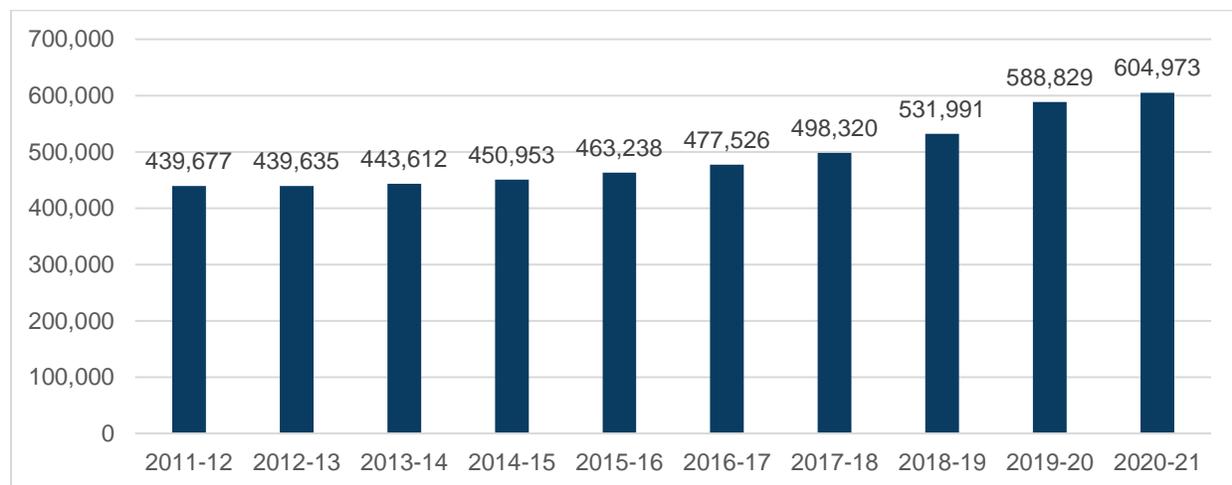
Source. U.S. Department of Education, National Center for Education Statistics. (2016). Digest of Education Statistics, 2015 (NCES 2016-014), Chapter 2

This level of growth was substantially higher than the overall student population growth in Texas, which increased 7.7 percent during the same 10-year time period. During the time period of 2017-18 through 2019-20, Texas' growth rate in students with disabilities (18 percent) was at least 10 percentage points higher than the growth rates in Florida, California, New York, Pennsylvania, Illinois, and Ohio.

Much of this growth is believed to have occurred as the result of a change in the State's special education accountability system, which previously included an 8.5 percent target rate for the percentage of the total students that were identified as students with disabilities. This accountability mechanism was prompting some LEAs to inappropriately deny services to eligible students in order to stay under the 8.5 percent cap. The U.S. Department of Education intervened and required the State of Texas to implement a Corrective Action Plan that included the development of a new monitoring system to ensure that all eligible students are receiving special education programs and services as required by the Individuals with Disabilities Education Act.

With this growth has come challenges, for LEAs and for the State. The increase in students with disabilities has contributed to increases in the types and quantity of service offerings – and the related financial resources – to meet this demand. From 2015-16 to 2019-20, state special education spending increased from $5.6 billion to $7.13 billion, an increase of 27 percent (Figure 3).

Figure 3. Texas Special Education Spending, All Funds, 2015-16 to 2020-21 (in $ billions)
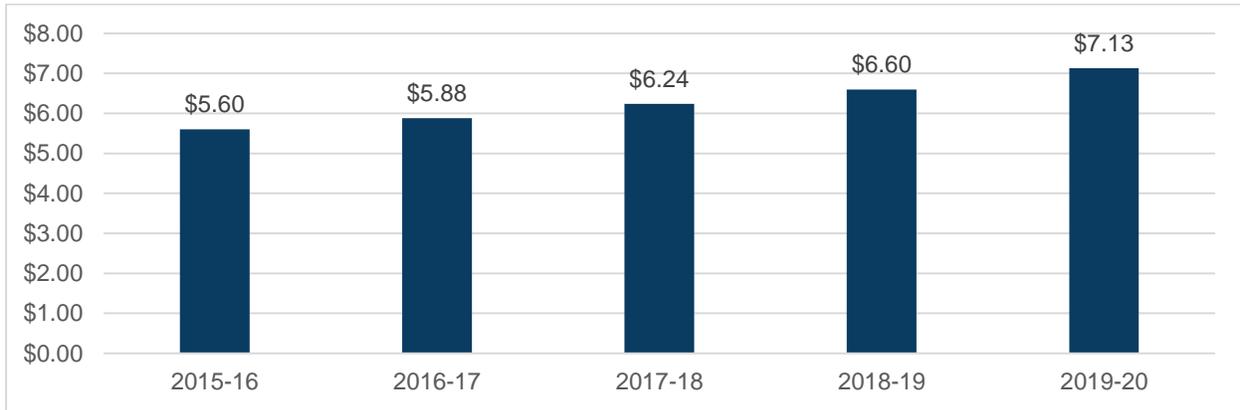
Source. TEA Texas Annual Performance Reports, 2016-17 to 2020-21 (one-year reporting lag for financial information)

Achievement gaps continue to exist between students with disabilities and their non-disabled peers, although achievement gaps are narrowing. Figure 4 presents STAAR results (approaches grade level) for all students and students with disabilities for all subjects from 2015-16 to 2018-19 (pre-COVID). During this time, the achievement gap decreased from 36 percent to 32 percent.

Figure 4. STAAR Percentage Approaching Grade Level, All Subjects, All Students and Students with Disabilities, 2015-16 to 2018-19
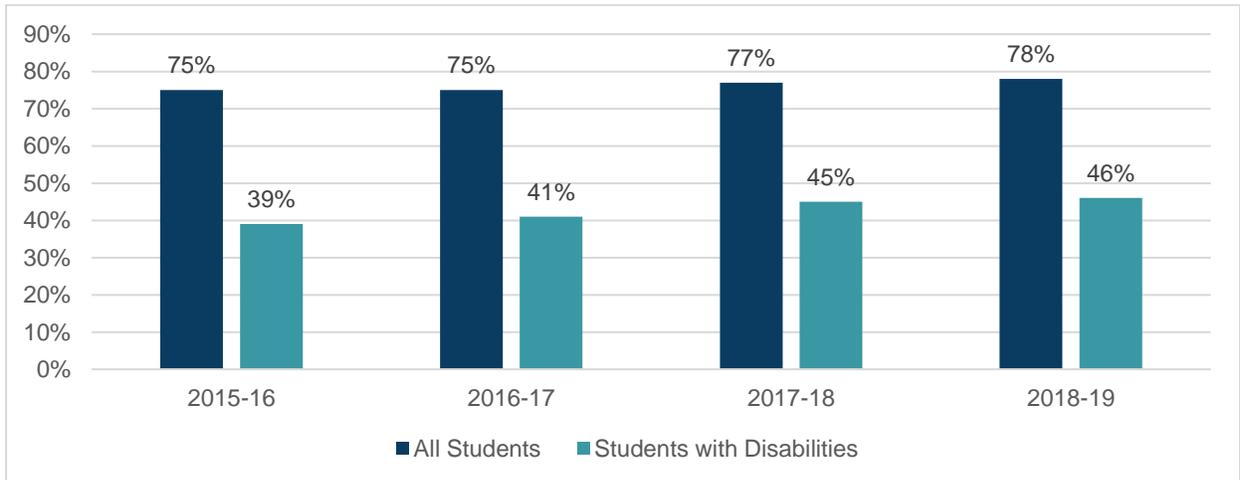
Source. TEA Texas Annual Performance Reports, 2015-16 to 2018-19

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

State Performance Plan

Pursuant to the requirements of OSEP, the State of Texas is required to develop a six-year performance plan that evaluates the State's efforts to implement the requirements and purposes of the Individuals with Disabilities Education Act of 2004, Section 616(b). The State Performance Plan (SPP) is developed annually in conjunction with the Annual Performance Report (APR) and submitted to OSEP each February. The SPP portion of the report contains procedural accomplishments and plans across the following domains to support ongoing compliance and continuous improvement.

- General Supervision System – the systems that are in place to ensure that IDEA requirements are met (e.g., monitoring, dispute resolution).

- Technical Assistance System – the systems that are in place to ensure timely delivery of high quality, evidenced-based technical assistance and support.

- Professional Development System – the mechanisms the State has in place to ensure that service providers have the skills to effectively provide services that improve results for students with disabilities.

- Stakeholder Involvement – the mechanism for soliciting broad stakeholder input on targets in the SPP, including revisions to targets.

- Reporting to the Public – of LEA performance against state targets, and posting on the website of the SPP.

The APR portion of the report provides the State's progress against special education (RDA) performance indicators.

Special Education Strategic Plan

The TEA Special Education Strategic Plan, dated April 23, 2018, is the primary document driving ongoing agency activities with respect to special education. This plan outlines a system that supports efforts to achieve strong outcomes for all students with disabilities. This system balances compliance with a results-driven focus on student outcomes. The plan also includes specific actions to address correction requirements outlined in OSEP's letter to the State in January 2018. The following major initiatives were established in the Special Education Strategic Plan:

- Establishment of the Department of Review and Support unit;

- A system of sanctions for LEAs that do not comply with State and federal regulations;

- Development of standardized processes for conducting reviews, including the development of documentation and reporting templates to be used, and standards for on-site monitoring;

- The collection of additional data from LEAs to support the new monitoring requirements, while maintaining strong controls over data privacy; and,

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

- Review and potentially propose administrative rule revisions to ensure compliance with State and federal law and alignment with best practices for serving students with disabilities.

New Special Education Monitoring System

The Special Education Strategic Plan outlined three major components of TEA's Special Education Strategic Plan: 1) Monitoring; 2) Training, Support, and Development; and 3) School, Family, and Community Engagement. Special Education monitoring is further broken into the following three interrelated elements:

- Differentiated Monitoring System – the majority of TEA differentiated monitoring is performed through cyclical and targeted desk reviews. Cyclical desk reviews are conducted every six years for each LEA. Targeted desk reviews are driven by RDA indicators (further explained below) to identify more intensive support needs.

- LEA Self-Assessments – this new element of the monitoring system requires LEAs to conduct a self-assessment of their special education program using a rubric provided by TEA. This rubric supports the LEA's development of a Results Report that identifies developed, proficient, and exemplary ratings for each strategy and compliance item to be addressed. LEAs use the results of the self-assessment to develop an SSP to achieve goals and address program weaknesses. These documents become part of TEA's desk review processes.

- Results Driven Accountability System – the RDA System represents an enhancement of the previous accountability framework, the Performance-Based Monitoring Analysis System (PBMAS). The RDA tracks the performance of LEAs against indicators for academic achievement, post-secondary readiness, and disproportionate populations, among others. The RDA collects information from the Texas Student Data System (TSDS) / Public Information Management System (PEIMS), and the State test contractor, among other sources.

Figure 5 presents a map of TEA's differentiated monitoring and support process, showing the differences between cyclical and targeted monitoring and the relationship of each to RDA risk levels (DL1 – DL4), the number of years with significant disproportionality (i.e., SD3), and respective monitoring efforts.

Figure 5. TEA Differentiated Monitoring and Support Process Map
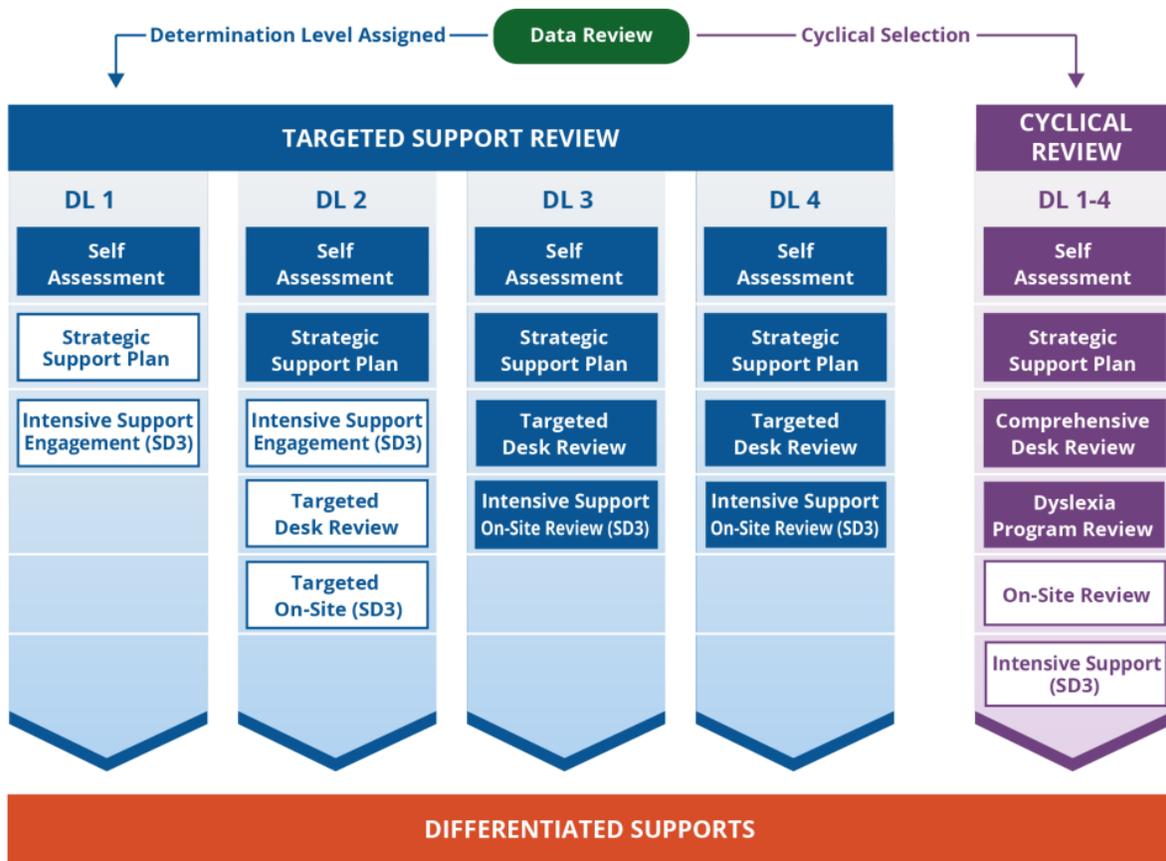
Source. TEA Differentiated Monitoring and Support Guide

Monitoring Operations

TEA internally reorganized to meet these new demands, creating the R&S unit to be responsible for on-site and desk review monitoring activities, escalation of support, and the identification and implementation of solutions. (This work performed by this unit represents the scope of monitoring activities related to this evaluation.) Beginning in 2018, this unit re-built the special education monitoring system while continuing to conduct monitoring activities. Both of these efforts continued during the COVID-19 pandemic.

Since 2018, R&S has grown from its infancy to 57 full-time positions, reflecting the Agency's commitment to the new monitoring system. Monitoring procedures have been re-written, new tools to support compliance and performance assessments are in development, and new information systems have been implemented. While the primary focus to date has been on improving compliance monitoring, significant efforts (i.e., the Quality Rubric) are in process to support the assessment of compliance and the use of best practices that support student achievement. These initiatives are discussed later in this report.

During the six-year cyclical desk review process, all 1,216 LEAs (school districts and charter schools) will be subject to a desk review. The number of targeted desk reviews will be driven by RDA indicator levels. During 2019-20 and 2020-21, 86 and 76 LEAs received a targeted review, respectively. Over the two-year

period, two-thirds of these LEAs reflected a DL3 level requiring intervention, and one-third reflected a DL4 level requiring substantial intervention.

For certain types of compliance exceptions noted during a desk review, a Corrective Action Plan (CAP) may be required of the LEA. This prompts additional monitoring activities by R&S. Cyclical monitoring CAPs initiated decreased from 87 to 80 from 2019-20 to 2020-21, while Targeted monitoring CAPs initiated declined from 17 to 1 during the same time period.

Chapter 3: LEA Perceptions of TEA Monitoring

This Chapter presents the results of the LEA data collection based on virtual site visits/interviews by the Evaluation Team with LEA central office staff, school leadership, and school staff.

TEA has its own LEA data collection activity during the LEA's engagement in TEA monitoring activities – a service quality survey. This survey seeks to identify potential gaps or focus areas in TEA's customer service to support internal continuous improvement. The survey is administered in two parts:

1. Expectations survey – used to understand expectations regarding customer service as it relates to cyclical monitoring; and,

2. Perceptions survey – used to understand the degree to which TEA met expectations regarding customer service as it relates to monitoring activities.

Where applicable, references are made in this Chapter to the most recent survey results.

Overall, LEA perceptions are highly favorable and reflect early-stage success in TEA's transformation of its Special Education Monitoring Program. LEAs feel more actively engaged "with" the Agency in monitoring as opposed to being "subject to" monitoring activities, specifically citing TEA's efforts to help them improve practices and student outcomes. LEAs also had favorable feedback on: TEA's new *Ascend* system; available resources and support from TEA Specialists and ESCs; and the impact of the monitoring process on resulting positive changes in the LEA. LEAs also feel more connected to the TEA Specialists conducting the review, due to new video conferencing activities, more frequent email communications, and the perceived new attitude of TEA Specialists caring about the LEAs they are monitoring. This positive feedback is particularly important in light of the fact that the incidence rate of LEA non-compliance actually increased during this review cycle. Perhaps for the first time, LEAs feel that the TEA Monitoring Program is an active and joint stakeholder in their efforts to continuously improve their respective Special Education compliance, programming, and outcomes.

Most "negative" comments received were framed by LEAs as improvement opportunities for TEA, such as additional training for TEA Specialists, maintaining communications with the LEA after the monitoring process is complete, relaxing timelines for document submissions, and getting Chief Financial Officers more involved in the monitoring process. Other negative comments were at least partially attributable to circumstances (i.e., COVID impact on LEA staff turnover and absence of TEA site visits) or natural negative attributes commonly associated with being subject to a compliance audit (i.e., burdensome, time consuming, stressful).

The remainder of this Chapter describes the data collection and analysis processes applied, and seven findings resulting from the LEA data collection.

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

LEA Data Collection and Analysis Processes

Objectives

As part of the SPED monitoring evaluation, Gibson sought to capture the perspectives of LEA central office staff and campus-level staff who participated in SPED monitoring activities and who may have interacted with the TEA monitoring team throughout the process. The primary objectives of this statewide data collection effort were to learn the LEA perspectives on:

- Communications and interactions with TEA staff related to the new monitoring system;

- Direct experiences with processes related to the new monitoring system;

- How the monitoring and support process may have impacted compliance and quality of service outcomes;

- How changes to the SPED monitoring system may be differentially benefitting LEAs compared to the prior monitoring system; and,

- Ways in which the new SPED monitoring system can be improved.

Positions Interviewed

The number of interviews and the roles included in the data collection effort at each LEA differed, depending upon the size of the district and/or how many individuals were involved in SPED monitoring activities. The Evaluation Team initially reached out to the LEA Superintendent or District Coordinator for School Improvement (DCSI), SPED Director, and Chief Financial Officer (CFO) for interviews. In addition, the SPED Director was asked to provide the names of campus-level personnel who may have played a significant role in the monitoring process.

Over the March to June 2022 period, Gibson conducted either individual or group interviews with 26 individuals across eight geographically diverse LEAs.

Depending upon the LEA, the number of interviews conducted ranged from one (where the SPED Director was the primary contact) to seven (where LEA staff in varied roles participated in TEA monitoring activities). The following positions participated in interviews with the Gibson project team:

- Superintendent

- DCSI

- SPED Director

- SPED Program Manager

- Chief Financial Officer

- Campus Principal

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

- ▪ Diagnostician

LEA Selection

As required by the evaluation work specifications, the Evaluation Team was required to select a sample of 8 to 10 LEAs for data collection. Ten LEAs were selected to participate in the Special Education Monitoring Evaluation; however, two chose not to participate. The Evaluation Team conducted interviews with staff from the eight remaining LEAs. Table 1 presents the list of LEAs participating in the evaluation interviews along with descriptive information about the LEAs and their involvement.

Table 1. List of LEAs Interviewed

LEA	Number of Interview Participants	Monitoring Review Type	ESC Region	LEA Size (Student Enrollment Range)
Brownsville ISD	4	Cyclical	1	40,000 - 50,000
Desoto ISD	5	Targeted	10	5,000 – 10,000
Hempstead ISD	1	Targeted & Cyclical	4	1,000 – 2,000
Dripping Springs ISD	2	Cyclical	13	5,000 – 10,000
Pleasanton ISD	3 (7 including all focus group participants)	Cyclical	20	2,000 – 5,000
Dawson ISD	1	Cyclical	17	Less than 1,000
Houston ISD	5	Targeted	4	Approximately 200,000
Harmony Charter Schools	1		19	

Source. Prepared by Gibson Consulting Group incorporating information from TEA's Department of Review and Support Master Spreadsheet

The eight LEAs which participated in the interviews were all located in different ESC regions of the State. LEAs ranged in size from less than 1,000 enrolled students to approximately 200,000 enrolled students. Two LEAs had more than 40,000 enrolled students, two had between 5,000 and 10,000 enrolled students, one had 2,000 to 5,000 enrolled students, and the remaining two LEAs had less than 2,000 students. One charter school was included in the sample. A mix of LEAs engaged in cyclical and targeted monitoring activities participated in the evaluation.

Interview Guides

The Gibson project team developed separate, but structurally comparable interview guides for superintendents/DCSIs, SPED Directors, CFOs, and other SPED program managers and campus-level staff. The protocols centered on communications and interactions with TEA, details about the SPED

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

monitoring process and direct experiences with the various activities contained in the process, perceived impacts of the monitoring activities, perceptions about changes in the new monitoring system and ways in which it can be further improved.

The Evaluation Team employed thematic analysis (Braun & Clark, 2006)[1] focusing specifically on experiences with the new monitoring process that would yield actionable insights for TEA's continuous improvement of this system. Based on initial impressions of the data, we developed a priori coding scheme presented in Table 2.

Table 2. Thematic Coding Scheme

Code Category	Description
1. Communication	We defined this category as communication protocols, processes, delivery of monitoring expectations, and communication between stakeholders throughout the monitoring process. We examined both LEA and TEA communication practices. However, for the purposes of this report, we focused specifically on TEA.
2. Timeline	We coded all mentions of the monitoring timeline under this category. For example, in this code category there are mentions of the pace of activities from initial notification to the outcomes of the process. We also documented overlapping monitoring projects that occurred at the same time.
3. Comparisons with the previous monitoring process	We collected appreciations and affordances of the new process, as well as critiques of the process that were couched in connections to past experiences with the TEA Special Education monitoring process in its prior model or format.
4. Monitoring feedback and outcomes	We tracked how LEAs received their monitoring feedback and how they reported action outcomes. Further, we documented their comments on the usefulness of this feedback.
5. Relationships with TEA	We coded for relational statements about LEAs' experiences with TEA and their work with ESCs.
6. Support activities and resources	We identified and sorted the supports that LEA representatives reported as beneficial throughout their monitoring process. This included supports within their LEA, from TEA, and/or distributed through ESCs.

Source. Gibson Consulting Group, Inc.

The following section presents thematic findings from this data collection and analysis process, organized by overarching themes. Within each finding, we provide the following four components:

1. An overview of the finding;

2. References to the number of LEAs who reported information that contributed to the finding;

---

[1] Braun, V., & Clarke, V. (2006). Using thematic analysis in psychology. *Qualitative Research in Psychology, 3*(2), 77-101.

3. Illustrative anecdotes from the interview data; and,

4. Interpretation and analysis of the finding that provides specific insight into opportunities for continuous improvement of TEA's Special Education monitoring process.

Thematic Findings From LEA Data Collection

Finding 1: Flexible and responsive communications by TEA empowers LEAs to ask questions and more actively engage with the monitoring process.

The LEA representatives that we interviewed appreciated the flexible and responsive communication practices that supported TEA's Special Education monitoring process. There were more than 79 direct comments on TEA's communication processes across our 26 participants and all of the participating LEAs, and the feedback was largely positive. Figure 6 presents LEA perceptions of TEA's communication practices by type (e.g., positive, negative, and neutral).

Figure 6. References to TEA's Communication Practices

■ Positive ■ Negative ■ Neutral
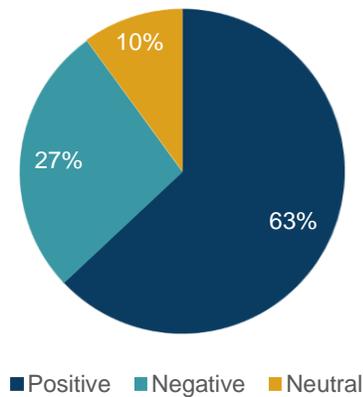
Source. Gibson aggregation of coded data collection results

Of those 79 coded statements:

▪ 63 percent (50 responses) described positive experiences with and/or expressed appreciation of TEA's communication processes during the monitoring process;

▪ 27 percent (21 responses) expressed a sentiment about how TEA communication practices could be improved; and,

▪ 10 percent (8 responses) described the process factually without a positive or negative sentiment.

The following sections contain more specific information input related to TEA communication practices.

TEA Video Conferencing

Interviewees from seven of the eight LEAs (87.5 percent) referenced TEA's video conference call that followed the initial, formal written notices of the monitoring process. These references were positive, citing

the utility of subsequent video call interactions over the course of the monitoring process. These calls helped ensure that LEA individuals involved in the process knew who was helping them, and they expressed satisfaction with a more personalized explanation of the process. A Special Education Director in one LEA described the experience as "humanizing." Additionally, these sessions were described as "live Q&A sessions" that were seen as helpful opportunities to ask TEA staff specific questions.

According to another Special Education Director, the video conference call was the most effective mode of communication during the process because it was more helpful than the written documentation. This Director clarified that this was because the conversation enabled a robust discussion of details. Other LEA representatives added that they felt like they were able to ask questions that resulted in contextual responses specific to their LEA.

Responsive Email Practices

While the TEA compliance monitoring process entails formal reports and communicative documents, the informal communication via email was described as highly beneficial. Representatives from all eight LEAs appreciatively noted the responsiveness of TEA contacts to emails regarding questions, clarifications, and the monitoring timeline. This responsiveness led to "rapid feedback" at "each step" in the monitoring process. Bound up in comments about the email conversations were comments regarding their points of contact with TEA and their frequent email exchanges with Special Education Directors. Six of the eight LEAs referenced the availability of the TEA Program Specialists and how they were able to benefit from these Specialists' expertise about how to successfully navigate this process.

In addition to the above two interactive modes of communication, many of the LEA representatives who participated in the interviews mentioned how materials provided by TEA, like rubrics, helped make the process clearer and helped them execute their responsibilities successfully (see Finding 3 on page 24 for more details).

Requests for More Communication After the Final Report

Five out of eight of the LEAs (62 percent) had representatives who provided specific feedback about how TEA's communication with them could be improved. These suggestions were a combination of self-initiated responses and a direct result of questions asked by the Evaluation Team related to areas for continuous improvement. The interview protocols used to conduct conversations with LEA representatives included some variation of "what needs to be improved" as a follow-up probe to a question regarding large-scale TEA processes. The salient theme expressed was a lack of sustained communication and feedback after a Corrective Action Plan was submitted by the LEA to TEA.

Interpretation of Communication Findings

Overall, LEAs relayed that the "constant" communications and frequent "touch points" (specifically video and email) were highly effective. The support from TEA through these communication practices aided in LEA's work to meet the monitoring process requirements. The primary improvement opportunity is a desire by LEAs to continue interacting with TEA beyond the original compliance directive. Special Education Directors, in particular, seem eager to continue the conversation through check-ins after LEAs receive the final TEA report.

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

Finding 2: Strong relationships between TEA Specialists and LEAs are successfully reframing the monitoring process.

This finding about relationships with TEA Specialists appears to be directly related to the TEA communication practices discussed above. The interview protocols did not directly ask participants to describe their relationship with TEA. However, participants did mention relationships regularly during the interviews. LEAs expressed strong, positive sentiments about their interactions with TEA Specialists, as depicted in Figure 7.

Figure 7. Sentiment Frequency of Statements Pertaining to LEA Relationships with TEA
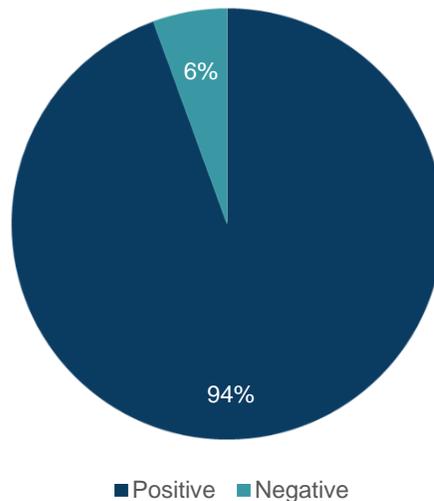
Source. Gibson aggregation of coded data collection results

The Evaluation Team coded 36 statements relating to TEA Specialists' relationships with the LEA staff:

- Ninety-four percent (34 responses) described positive interpersonal relationships with TEA staff members.

- Six percent (two responses) expressed areas for growth regarding interpersonal relationships with TEA staff members. These two comments reflect individual perspectives from two different LEAs.

An unexpected and encouraging finding in the data is that the relationships TEA Program Specialists formed with their school LEA contacts served to "reframe" the monitoring process. This process that may have been interpreted as one of accountability with a surveillance or punitive angle in past was now described as a process that added an emphasis of supporting growth and improvement to the compliance mandate. Several examples offered by LEAs illustrate this shift:

- One LEA leader directly referred to the anxiety that often circulates when TEA activates a monitoring process. This District Coordinator of School Improvement commented that while the TEA representatives are "polite and professional," the LEA "folks still get nervous" when interacting with them as part of this process. This statement, however, was balanced by statements on the other end of the continuum.

- One LEA staff member described how the TEA Specialist she interacted with was "warm" despite their authoritative position with the monitoring process. This warmth was evident in how the TEA Specialist worked hard to understand her LEAs' unique needs.

- One Director shared that the relationship with the TEA Program Specialist ensured that she never thought of the monitoring process as an "I got you." Rather, she described how it is a way to "see how you [the LEA] can do better." She noted that this iteration of the monitoring process had a "softer side" which was good. She attributed this growth orientation to the relationship she and the LEA built with their Specialist, who made it seem like they were in the process together. This positioning helped the officials in her LEA to accept the results in a positive way to see how they could make a better system for their LEA.

- A Special Education Director echoed that sentiment, saying that their TEA contact was great and made sure the process did not feel like a "gotcha process."

In the following sub-sections, three key elements of TEA Program Specialists' relationships with their LEA contacts emerged as significant to this reframed monitoring experience, with references to aggregate and specific data points.

Frequency and Flexibility

As described under Finding 1 on page 19, LEA representatives interviewed during this evaluation found TEA's communication practices to be responsive. It became apparent to the Evaluation Team that frequent and accessible communication was foundational to participants' positive relationships with TEA Program Specialists. A representative from a large LEA said that the regular, proactive weekly communication as well as the responsiveness to additional calls or emails with questions was appreciated. Another noted that feedback was quick and timely following each step of the process.

Representatives from four of the eight, or 50 percent, of the LEAs repeatedly relayed that they felt comfortable sharing their unique, contextual experiences with TEA Program Specialists and that their TEA contacts helped them work with the system to meet requirements, even if that meant being flexible with deadlines and material submissions.

A different, but important aspect of flexibility was ease of communication and relationship building. A superintendent of a small LEA specifically complimented the TEA monitoring staff, remembering that they were easy to work with because of their flexibility throughout the process. For example, one LEA experienced being flagged for the same issue repeatedly, and noted that their experiences with this recurring issue were listened to with care and concern. Likewise, a Specialist from another LEA noted the warm demeanor of TEA staff (referenced under Finding 1 above) and went on to say that the warmth was evident in how the TEA Specialist worked hard to understand her LEAs' unique needs.

Shared Expertise

Seven of eight LEAs (87.5 percent) explicitly mentioned that their TEA Program Specialist was knowledgeable about the monitoring process and IDEA requirements. For instance, one LEA leader explained that the TEA Program Specialist they worked with was clear and detailed about exactly what it would take to successfully clear the monitoring process and resolve the identified compliance issues. Taken

even further, one participant noted that TEA staff felt like a part of their LEA's Special Education Department because they were so present and supportive in addressing compliance issues raised in the monitoring process.

Naming Strengths Observed During the Monitoring Process

We asked each of the different types of LEA representatives, with the exception of CFOs, a question to the effect of, "To what extent did the TEA Review and Support team highlight areas where your Special Education Program was demonstrating success?" The Special Education Director at one LEA shared that the TEA Specialist they worked with offered positive feedback about their documentation, but wished that other elements of their work had been appreciated.[2] Four other LEAs had multiple representatives comment on the positive feedback that they received. Positive comments included successes related to the Admission Review and Dismissal (ARD) process, Individual Education Program (IEP) documentation, and testing. However, by and large participants apologized for being "fuzzy" on the specifics. One LEA explained that the nature of the process meant that they focused primarily on the corrective actions listed in TEA's communication, rather than on any commendations received.

Negative Feedback about Relationships with TEA Representatives

Throughout our data set, there were very few comments that expressed negative experiences or feedback about LEA's relationships with TEA representatives or Specialists. There was the above-mentioned comment about general nervousness when interacting with TEA representatives, but this seems to have been more process-induced than person-induced. There was only one negative comment by a Special Education Director that TEA did not build a strong relationship with the LEA.

Interpretation of Relationship Findings

The lack of negative perceptions of LEA relationships with TEA is significant. Both the quantity of evidence indicating the constructive relationships formed among TEA and LEA employees and the lack of negative reports indicate that TEA's revisioning of the Special Education monitoring process appears to be working at the relational level. Further, although LEAs did not report effusive praise of the appreciative stance TEA Program Specialists may have brought to bear in their communications, the Evaluation Team interprets the naming of strengths as an important, implicit element in the connections the TEA staff were able to forge with LEA contacts.[3]

---

[2] Due to a limitation in the *Ascend* desk review information system, the TEA desk review reports identify only the top three best practices even if more exist. Specialists must prioritize if there is a longer list. As discussed in Chapter 4 of this report, other opportunities to share additional best practices exist and are used to communicate additional best practices, such as the TEA/LEA desk review exit conference.

[3] It is relevant to note that these findings are consistent with a recent survey quality survey conducted with LEA Special Education Directors where a number of constructs were measured, including communication quality and responsiveness. On a five-point quality scale, LEA Special Education Directors rated TEA's review and support staff's communication quality (mean of 4.4 of 5.0) and responsiveness (4.6 of 5.0) on the high end of the survey scale.

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

Finding 3: LEAs value external resources and supports.

The Evaluation Team found that LEAs valued a wide range of resources and supports that helped them navigate the TEA Special Education monitoring process. Resources and supports relates to materials and staff support provided by TEA or ESCs, as well as relationships with other organizations. Figure 8 presents the prevalence of resources and supports noted by LEAs. There was variability in how LEAs both referenced and used the various supports available to them during the monitoring process, which is discussed in the following sub-sections below.

Figure 8. TEA Documentation and ESC Resources Reported by LEA Participants
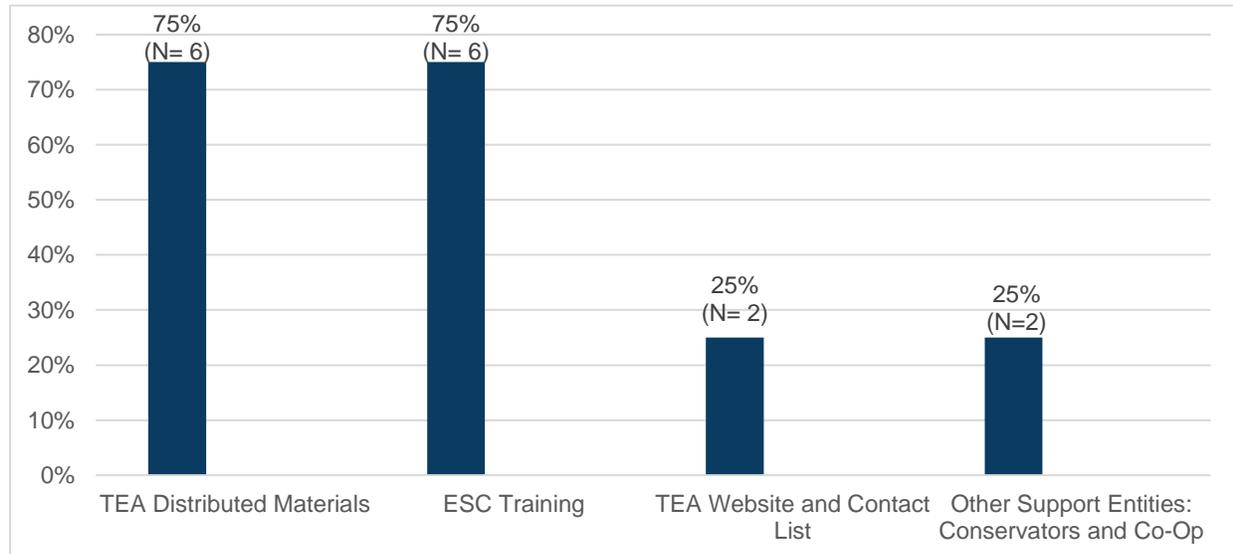
Source. Gibson aggregation of coded data collection results

TEA Provided Materials

One LEA Director noted that the revised monitoring process was made clear through the rubrics provided by TEA, and that their addition to the updated process was "wonderful." Another LEA employee working to support a Special Education Director in a different LEA added details to that description, sharing that the rubric was incredibly helpful in communicating directives and that the exemplar documents provide suggestions for how to respond to the monitoring process. The self-assessment process and related checklist provided by TEA were so clear that a LEA Special Education Director did not feel the need to turn to their ESC for support. Instead, they created their own training about the monitoring process based on the self-assessment document. Further discussion of the self-assessment, and how LEAs took this up to revamp their internal audit processes, will be addressed in Finding 6 about outcomes of the monitoring process.

An LEA superintendent highlighted the fact that in this instance of the monitoring process, TEA did a better job of providing LEAs with exemplar documentation. These exemplars were valuable artifacts that offered additional insights into what was expected and were able to be shared with all educators involved in the process. Similar to the rubrics and exemplars, templates for products like the CAP were useful in planning how to construct those documents. One Director referenced using it carefully during the planning process.

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

ESC Trainings

One Special Education Director reported immediately turning to her local ESC for training as soon as they received TEA's notification that they were identified for a Special Education monitoring visit. The services from the ESC became that LEA's primary support to successfully develop a CAP. Another Special Education Director described how she would have been lost in the process if her ESC had not reached out. She benefited immensely from the training they provided and the way they answered all her questions.

One LEA participated in ESC training and monthly meetings throughout the process. Two other LEAs reported having benefited from the virtual ESC training because it prepared them for what the new process would entail and gave them insights into how to look at their data. During the monthly meetings, LEA representatives who were in attendance were able to capitalize on recommendations that arose from those interactions. One LEA also met with their ESC specifically to discuss an issue that was recurrent in their Special Education documentation and receive targeted training on how to address that specific issue.

Even LEAs who did not contact their ESCs – or opt to use the provided services – reported being aware that they were available to "reinforce TEA's expectations," offer training, and otherwise provide technical assistance.

TEA Website and Resource Lists

Although not new to the revised monitoring process, three LEAs had representatives reference the TEA website and resource list of important agency contacts attached to a letter. Two LEAs mentioned these materials, but they did not seem to be widely used nor as appreciated as the other TEA resources.

Interpretation of Relationship Findings

Since 2018, TEA has established a collaborative partnership with ESCs to provide transparent communication, training, and supports to ensure service center staff is equipped with guidance aligned to federal and state requirements to assist LEAs engaging in monitoring activities. TEA conducts various structured engagements with ESCs to provide updates regarding state initiatives and feedback opportunities. Although LEAs did not fully leverage all the supports available to them, this finding suggests a clear indication that the resources provided were well received and regularly used. Further, the ESC is seen as the best option for LEA support through the monitoring process.

Finding 4: LEAs perceive monitoring timelines to be challenging.

The Evaluation Team found that all eight of the LEAs in the sample expressed difficulties with the timeline for this year's TEA Special Education monitoring process. As one superintendent expressed, "the process was clear" but the timeline was "tight." Through our thematic analysis we identified four common difficulties experienced across LEAs. These difficulties and the percentage of LEAs experiencing them appear in Table 3. Following the table, the Evaluation Team offers context about the challenges LEAs face.

Table 3. Explanations for Difficulty with TEA Special Education Monitoring Timeline

Explanation	Percentage of LEAs (n)
Significant Time Required	87.5% (n=7)

Explanation	Percentage of LEAs (n)
Staffing Issues	50% (n=4)
Overlap with Other Audits	25% (n=2)
Impact of COVID-19 Pandemic	12.5% (n=1)

Note. LEAs may have indicated multiple reasons for difficulty with the timeline. Thus, percentages in this table do not add up to 100 percent.

Source. Gibson aggregation of coded data collection results

Significant Time Required

Representatives from seven of the eight LEAs (87.5 percent) shared that the large volume of staff time required during the Special Education monitoring process was a challenge to completing the necessary activities in the time allotted. For instance, a district coordinator of school improvement at one LEA said that the documentation required is "massive." On top of the work involved in meeting those documentation expectations, according to this participant, the process is one that involves constant communication.

The LEA-level Special Education staff are often not the only personnel involved in the monitoring process activities. Campus-based educators may also be required to pull files or support the documentation effort. Two different LEAs reported that it was difficult to get campus staff to participate and that they were wary about asking more of already burdened educators.

The larger LEAs appeared to be less overwhelmed by the heavy workload because they had a larger staff and were able to distribute the tasks to more people. An alternate explanation could be that, as one LEA reported, they were very open with their TEA Specialist about the scheduling constraints in their LEAs.

Smaller LEAs felt more of a challenge to accomplish all that was required of them in the time allowed. Special Education Directors from two different LEAs described how hard it was for them to do the majority of the work alone. For instance, one reported working well beyond normal business hours to be able to get all her documentation turned in on time, especially with the new self-assessment process.

One large LEA also mentioned the impact of the COVID-19 pandemic in relation to the large volume of labor. They explained how workloads, across the board, have increased due to COVID. This was a major issue in their LEA and as a result of the increased demands, the quality of work suffered. Adding to the internal complications, they noted that COVID-19 has changed things outside of the LEA's control, including grant timelines for securing funds for special education services. [4]

Staffing Issues

Four LEAs cited staffing issues as challenges to the monitoring process. One issue was a large, distributed set of educators (across campuses) involved in Special Education and the other was turnover in their LEA staff. These two factors, according to the interviewees, made it difficult to maintain consistency and high

---

[4] It is relevant to note that TEA posts on its Review and Support web page the date of upcoming cyclical monitoring activities of an LEA at least two years prior to the monitoring year. Additionally, an initial monitoring conference is conducted with LEAs to establish documentation expectations prior to monitoring activities.

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

standards in their Special Education services. One LEA found that changes in school leadership have led to a multiplicity of ideas about how best to navigate Special Education processes.

A Special Education Director for a larger LEA compared the LEA to a "large ship" with many players, which makes it "difficult for people to hold true to the practice or procedure." Further, being such a large LEA led to having a decentralized structure, with campuses having latitude without much LEA oversight. Each campus had its own processes which makes communication challenging. Having many people involved in the process, according to this Special Education Director, meant that some people participated without fully understanding the ins-and-outs of the compliance practices.

Further, being such a large LEA means that there is a fairly constant rate of turnover. This LEA leader explained that ongoing hiring necessitated perpetual professional development for new employees regarding Special Education requirements. Even as educators were being trained, the onboarding process created inconsistencies in practices or services for students with disabilities.

Smaller LEAs also experienced challenges in their Special Education services stemming from teacher turnover. One Director from a small LEA said that having a high turnover rate with new teachers who did not have a special education background made it difficult for her to keep things running and provide the necessary training for incoming staff.

Overlap with Other TEA Monitoring Processes

Two of the smaller LEAs who felt overwhelmed by the labor and timeline of the Special Education monitoring process experienced other monitoring efforts focused on Dyslexia at the same time. In the words of one Special Education Director, "for smaller LEAs, it's hard to have so much going on." She noted that the rigors of the two monitoring processes were so great that she was rushed in preparing her materials and worried about not submitting everything that TEA requested for each of the respective audits. The other Special Education Director responsible for two different monitoring processes reported that the LEA was unaware that the Dyslexia monitoring visit would be happening simultaneously and that they were late getting their information to TEA as a result. [5]

Likewise, one LEA had multiple representatives comment on the burden of being audited for the same element of their programs that were out of compliance. The burden they described came from having to start the process over from scratch, rather than directly building on what they had started in the previous year.

Interpretation of Timeline Finding

This finding has less to do with a TEA requirement or practice, and more with the nature of compliance reviews and their demands on the entity being monitored, particularly during a pandemic. While TEA provides ample notice to LEAs of upcoming monitoring efforts and expectations, and seeks to minimize LEA duplication of effort, monitoring activities are intrinsically burdensome on LEA staff, particularly in the

---

[5] It is relevant to note that Dyslexia monitoring activities are conducted in alignment with – and embedded within – the DMS system. Accordingly, LEAs engaging in cyclical monitoring activities are able to access the cyclical schedule located on the Review and Support web page 2 years prior to their monitoring year.)

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

context of other expected and unexpected work demands of those LEA staff members participating in the compliance monitoring activities.

Finding 5: LEAs implemented a wide range of changes as a result of TEA's monitoring.

During interviews, we asked participants to explain how their participation in the TEA Special Education monitoring process affected their policies and procedures for serving students with disabilities. It is important to note, however, that 62.5 percent (or five of eight) LEAs were still reviewing their findings at the time of the interview. Two LEAs (25 percent) noted that they appreciated TEA was not prescriptive in their reporting, which enabled each LEA to make changes that best suited their complex institutional and community needs.

In this context, the monitoring process prompted a wide range of changes in the sample LEAs' Special Education departments and processes. Figure 9 presents the main areas of improvement and incidence rates among LEAs. Following are additional explanations of these changes.

Figure 9. LEA changes during and after TEA Special Education Monitoring Process
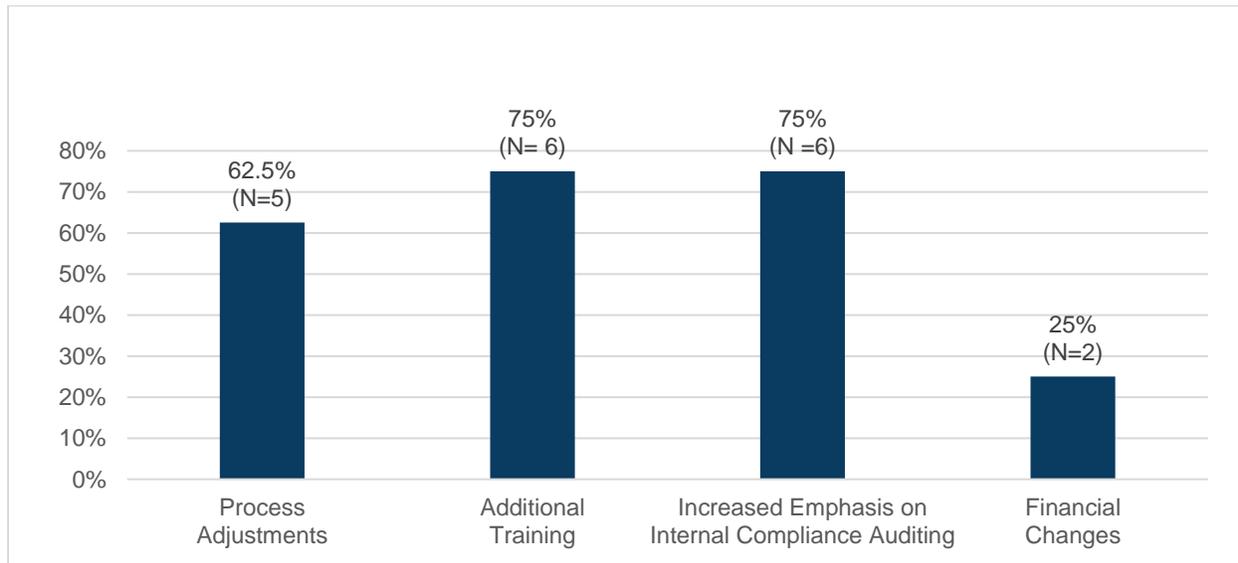
Note. LEAs may have indicated multiple changes. Additionally, LEAs may, after continuing to review findings from their TEA reports, continue to make internal changes.

Source. Gibson aggregation of coded data collection results

Process Adjustments

Five of the eight (62.5 percent) LEAs cited substantial process adjustments. These changes largely focused on bettering the lines of communication between district special education leaders and campus leadership as well as increasing consistency across campuses. Three LEAs reported changing their internal timelines for student identification and ARDs. Two LEAs shared that they started using new digital submission platforms for schools to upload materials from ARD meetings.

Additional Training and Professional Development

The need to engage LEA leadership and campus-based staff members in professional development related to Special Education protocols came up frequently. Six of the eight LEAs (75 percent) mentioned that they planned to increase training opportunities for educators. This training would support new and experienced educators in better understanding the importance of compliance and how to create quality documentation, in addition to preparing them to negotiate new processes implemented as a result of the monitoring.

One LEA described their plans for this professional development in detail. They would begin by meeting with "individual groups at each campus" to discuss the strengths and weaknesses of their Special Education processes. They would also solicit ideas about what people really needed out of their training so that they could receive targeted and tailored support specific to their reported needs. From there, LEA leadership intended to conduct "small group, individualized training" over the summer. The interviewee expected that this training, focused on "key players" such as principals, would increase the number of people who knew what changes were being enacted and would in turn be able to train the rest of their campus faculty.

In another example, one Special Education leader from a mid-sized LEA shared that the self-assessment element of the TEA monitoring process made her think about the biases embedded in professional learning and LEA curriculum. As a result of her examination of these two important areas, she has sought to engage in some curriculum reform to address the biases she found.

Increased Emphasis on Internal Compliance Auditing

Six of eight LEAs (75 percent) cited improving their practices for self-monitoring as a direct result of TEA's monitoring efforts, which included examining more files than those included in the evaluation. They viewed the monitoring process and the self-assessment component as an opportunity to identify areas of weakness in their work and to enact a plan to strategically address those weaknesses. One district coordinator of school improvement in a small LEA explained that the TEA monitoring made sure people were more consistent and doing a better job. The LEA intends to continue to do progress monitoring and internal checks for compliance to keep standards high. As LEAs engaged in their own audits, they found opportunities for improvement not always identified by the TEA Program Specialist or glossed over in the high-level report.

Financial Changes

Two LEAs referenced changes that involved financial investments. One large LEA shared that they changed rules about how money could be spent with outside vendors and increased funding to support the timely identification of students with disabilities. Likewise, another LEA hired more staff to engage in identification processes and purchased new software to support their tracking efforts.

Interpretation of Outcome Findings

As the Special Education Director of a larger LEA put it, the TEA audit "created greater awareness of growth areas" and another commented about the clarity of work to be done. Many LEAs cited their improved practices for self-monitoring that ranged from reviewing additional files to implementing professional development. These efforts are expected to support campus-based educators in better understanding the monitoring process, and drive new systems and tools (i.e., online portals) for better documenting special

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

education services in the IEP documentation. These efforts indicate that leaders from the sample LEAs desire to engage in continuous process improvement to support students, and want the TEA Program Specialists to support them in identifying and solving critical problems.

Finding 6: The new online monitoring platform was well-received by LEAs, although improvement opportunities exist.

The new, online Special Education monitoring platform *Ascend* was well-received and clearly explained by TEA Program Specialists. To get additional insights on the new version, the Evaluation Team asked participants with experience with the TEA monitoring process in place prior to 2018 to make comparisons between the new Special Education monitoring process and the previous system. Representatives from seven out of the eight LEAs were able to answer these questions.[6]

The Evaluation Team sorted these comparisons into two different categories: benefits and constraints. We first report benefits, then we describe reported constraints of the process, and end with an interpretation that reflects on LEAs' overall experiences.

Benefits of the New Special Education Monitoring Process

LEA representatives reported three different benefits of TEA's new monitoring platform. Table 4 presents these benefits and their incidence rates among LEAs sampled, showing that "ease of use" was by far the most commonly cited benefit. Following this table are additional details relating to each benefit.

Table 4. Benefits of TEA's New Special Education Monitoring Process

Benefits	Percentage of LEAs (N)
Ease of use of online system	85.7% (n=7)
Better documentation	37.5% (n=3)
Improved communication with TEA Program Specialist as single point of contact	37.5% (n=3)

Source. Gibson aggregation of coded data collection results

Ease of Online System

Participants who were intimately involved in the recent Special Education monitoring process commented on the ease of uploading files to the new system (i.e., *Ascend* System), particularly when compared to the previous paper-based processes used under the previous Special Education monitoring system. One participant commented that *Ascend* was more easily facilitated in an LEA that has online records than the previous paper-based system. A Director in a different LEA who was largely responsible for that paperwork noted that it was far less time-consuming than anticipated. Further, a special education manager in a larger LEA commented that the digital communication practices and the digital submission practices worked together smoothly as all pathways were aligned.

---

[6] The one LEA that did not answer this question had only one representative who declined to make comparisons.

Better Documentation

As mentioned in a previous finding, interview participants appreciated the documentation provided by TEA during the new monitoring process. In particular, LEAs highlighted how TEA did a "better job" of providing examples using the digital system and how helpful the rubrics were in navigating this system. Additionally, the documentation that included elements such as checklists, timelines, and exemplars provided clear guidance to LEAs as they navigated this process.

Improved Communication with TEA Program Specialist as Single Point of Contact

LEA representatives deeply appreciated the TEA Program Specialists, which was documented in Finding 2 starting on page 21. However, when specifically thinking about the advantages of the new online system, their role came up again. One Special Education Director from a mid-sized LEA offered a simple explanation for their value – having a single contact enabled that contact to be more responsive, helpful, and hands-on than having multiple people theoretically being available for support. Another Director echoed this sentiment lifting up how their relationship with their assigned TEA Specialist not only provided consistent communication, but also provided many opportunities to address difficulties or problems. A representative from a larger LEA affirmed this, adding that the single point of contact enabled TEA to be more proactive in their communication and clearer in their guidelines.

Constraints of the New System/Process

Although benefits associated with TEA's new Special Education monitoring system and related processes were more frequently referenced throughout the LEA interviews, the Evaluation Team also inquired about challenges or undesired changes of the new system and processes. Two key constraints, enumerated in Table 5, emerged from interviews with representation from all eight sampled LEAs. These are discussed further below.

Table 5. Constraints of TEA's New Special Education Monitoring Process

Constraints	Percentage of LEAs (N)
Learning curve for TEA staff and LEAs	35.7% (n=3)
Cumbersome process	50% (n=4)

Source. Gibson aggregation of coded data collection results

Learning Curve for TEA Staff and LEAs

Representatives from three different LEAs recognized that just as LEAs needed to learn about the new process, TEA Program Specialists were also experiencing a learning curve and challenges with implementing a new system still undergoing modifications. One Special Education Director who discussed the process with colleagues in other LEAs reflected that TEA Special Education Specialists might have been overwhelmed as well. She advocated for giving the TEA Program Specialists more time and space to complete their reviews in addition to more support such as helpful training. These things, as she implied, could help to make the new TEA Special Education monitoring process more streamlined and consistent. The third Special Education Director noted that all this change meant that there would be, inevitably, confusion as the new process was implemented.

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

Cumbersome Process

Despite the fact there was overwhelming support for the new online elements of TEA's monitoring process, 50 percent of the sample LEAs felt that the process was still cumbersome and burdensome. For example, one superintendent noted that while beneficial, the self-assessment required extensive work to complete. Building on that sentiment, a Special Education Director in a small LEA explained that the many elements of the self-assessment were time-consuming because they required several, varied participants.[7] The heavy involvement and use of time means, as one specialist at a larger LEA said, "there will be a high cost for teachers, and ultimately students, as educators work to engage in the process with fidelity."

Interpretation of New System/Process Findings

There was overwhelming LEA support for the new *Ascend* system and the new self-assessment process. This notwithstanding, the effort required is still perceived as cumbersome (not unlike any compliance audit). The LEAs realize that the system is new to TEA as well as to LEAs. This awareness is likely to support continuous improvement on both sides of the monitoring effort.

---

[7] In the first two years of Self-Assessment implementation, TEA has required LEAs to complete 7 of 23 compliance strategy items within the self-assessment. Many LEAs choose to complete all 23 as a continuous improvement process. Annually, the self-assessment five-month window opens in April of each year and concludes in September prior to cyclical monitoring activities initiating in October. The LEA has the ability to identify multiple users, which many LEAs have reported as useful for staff training and parent engagement.

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

Chapter 4: Evaluation of TEA Monitoring Processes

TEA has made significant strides in overhauling its monitoring process pursuant to the Special Education Strategic Plan. This guiding document, and TEA's implementation efforts to date, have driven a change in the philosophy of monitoring that is recognized by both the Evaluation Team and the LEAs receiving monitoring and related services (see related LEA data collection results in Chapter 3). TEA is successfully transforming its monitoring role from a "watchdog" approach to one of "continuous improvement." The Agency continues its role in compliance monitoring, but is now proactive in helping LEAs achieve more than compliance, reaching for best practices than can ensure compliance and have positive effects on student achievement.

Several specific strengths were noted by the Evaluation Team in this transition to an improved monitoring system:

- **Increase in staffing** – the R&S Unit was reconstituted in 2018, and has increased from 41 FTEs to 52 FTEs during the past year, an increase of 27 percent. TEA has demonstrated a financial commitment to the improvement of its Monitoring Program and the expansion of its services.

- **Program-experienced staff** – the R&S Specialist job description requires no less than four years' experience working with students with disabilities, and all R&S staff are currently program certified.

- **New procedures** – the TEA "Differentiated Monitoring and Support Guide" provides excellent guidance to TEA staff, LEAs, ESCs, and other Special Education stakeholders on the new monitoring system. Figure 10 presents a diagram from this 36-page Guide that clearly shows the major elements and interrelationships of the new Monitoring Program. This document is posted on TEA's website.

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

Figure 10. TEA Differentiated Monitoring and Support Process Map
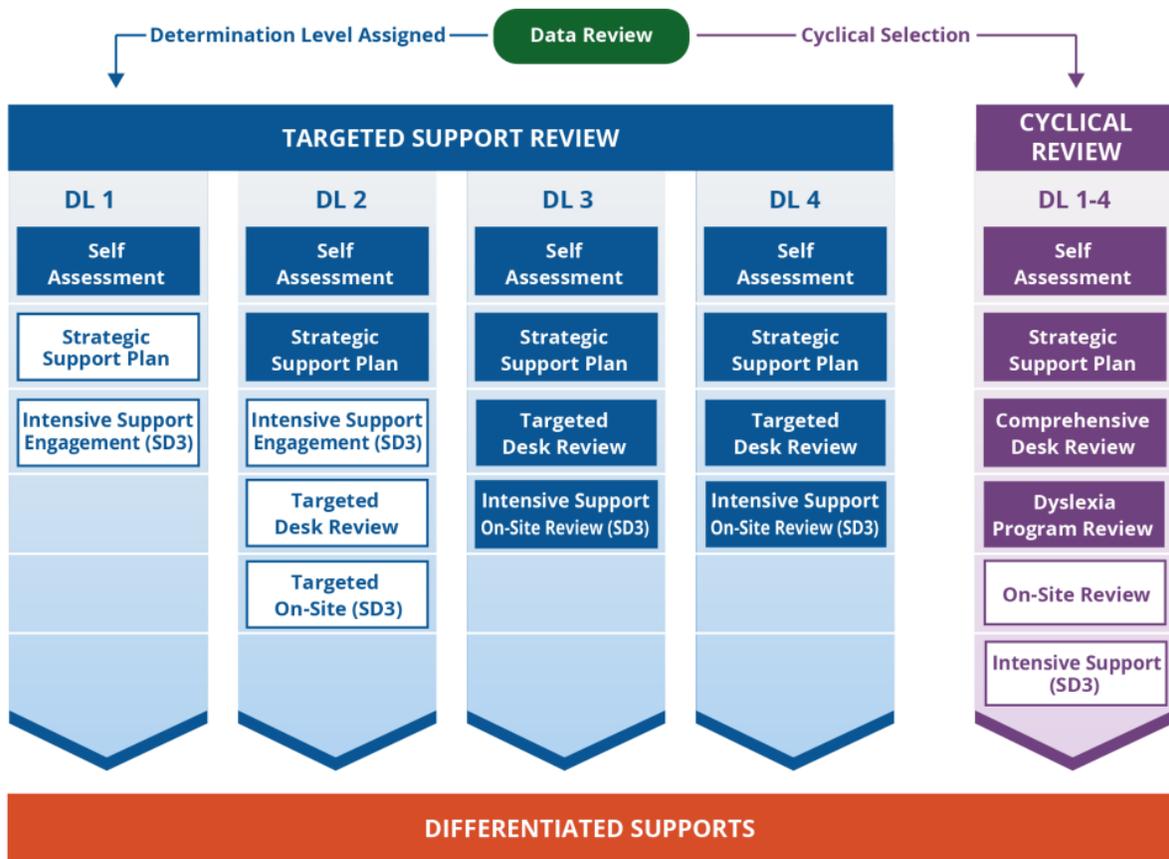
Source. TEA Differentiated Monitoring and Support Guide

The R&S Unit also developed a "Desk Review Procedures" Manual with instructions for conducting each element of a desk review, including the LEA policy review, cyclical and targeted reviews, and reporting. This manual also contains specifications for Student IEP selection sample sizes.

- **New information systems** – TEA implemented *Ascend*, an online platform to conduct cyclical and targeted desk reviews and perform other monitoring activities. The Evaluation Team obtained read-only access to this system during Spring 2022 and found this system to be intuitive, easily navigable, and user-friendly. While the implementation of *Ascend* is still in process (see related discussion below), in its current form it has already streamlined the performance of desk reviews through:

  - The uploading of student IEP files by LEAs for individual access by R&S staff;

  - The online data entry of TEAs compliance at the indicator level;

  - A dashboard to access and manage multiple LEA monitoring efforts simultaneously;

  - A corrective action plan feature;

- A progress monitoring feature;

- A strategic support plan feature;

- An online self-assessment with three years of data tracking feature; and,

- An external dashboard for individual LEAs users to visualize monitoring elements.

- **New Student IEP selection process** – beginning with the Cycle 3 Group 1 desk reviews in Fall 2021, TEA selects student IEP files for review. In prior years, the LEA selected the IEP files based on instructions and selection criteria provided by R&S. By selecting the student files, TEA eliminates the risk of LEAs "cherry picking" student IEP files for review by the R&S Unit. This change appears to be one factor contributing to higher incidences of non-compliance in FY 2022 than FY 2021.

- **Desk Review Quality Rubric** – this rubric, which is still in development, is an extension of the TEA Desk Review Rubric that contains the statutorily required compliance indicators. This rubric is being developed to provide:

  - Additional criteria to support R&S Specialists in identifying compliance exceptions;

  - "Proficiency" standards and criteria – to help LEAs move beyond compliance to an expected and beneficial practice; and,

  - "Best practice standards and criteria" – to help LEAs move towards best practices in the industry that can help improve student outcomes.

- **LEA Self-Assessments** – the self-assessments were cited by LEAs and by TEA staff as providing valuable information to identify potential compliance risks and technical assistance needs. These instruments also serve a purpose of facilitating ownership of special education practices, processes, and challenges by the LEAs.

- **Model IEP Form** – at the core of special education programming and services is the Individualized Education Program, or IEP. TEA has developed a "Model IEP" to provide guidance in meeting IEP-related compliance requirements, as well as guidance in achieving "best practice" in IEP development to drive growth in student achievement.

- **Technical Assistance Dashboard** – the Agency is developing a Technical Assistance Dashboard to provide one-stop shopping for LEAs and other stakeholders for technical assistance across multiple special education domains. Currently, technical assistance links are provided through the cyclical and targeted desk review reports, and additional technical assistance is provided via TEA communications throughout an LEA monitoring process. The Evaluation Team reviewed an April 2022 demonstration of the Technical Assistance Dashboard. Its implementation began in August 2022.

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

- **Promising Practices Reviews** – beginning in 2023, Promising Practices reviews may be conducted with some LEAs who meet requirements within the RDA framework, with the intention of expanding the implementation of effective practices to meet the needs of students through technical assistance networks, professional development opportunities, and other means.

- **New Student IEP selection process** – beginning with the Cycle 3 Group 1 desk reviews in Fall 2021, TEA selects student IEP files for review. In prior years, the LEA selected the IEP files based on instructions and selection criteria provided by R&S. By selecting the student files, TEA eliminates the risk of LEAs "cherry picking" student IEP files for review by the R&S Unit. This change appears to be one factor contributing to higher incidences of non-compliance in FY22 than FY21.

- **DMS Validation Method** - includes generating an annually updated list of LEAs for monitoring purposes, creating a SAS program that automates assigning LEAs to monitoring activities and rank ordering campuses for on-site visits, generating Special Education monitoring reports, and analyzing results from the monitoring system based on department-wide metrics.

- **Education Service Center Liaisons** - provide individualized technical assistance, training, coaching, and implementation support aligned to monitoring outcomes discussed in quarterly data and SECIP meetings. These meetings afford ESC and TEA staff structured opportunities to examine the unique needs of LEAs across the State.

- **Compliance Review Team –** provides compliance support during the cyclical and/or targeted desk review process. The team is responsible for providing data and guidance related to compliance with state and federal guidelines within the DMS framework. This process was designed to provide inter-rater agreement among the Division of Review and Support.

Desk Review Analysis

The purpose of this evaluation component is to present the Evaluation Team's current understanding of the desk review process and document observations to date. The information used to support this analysis included documents requested from the Agency and interviews with the Review and Support staff. Documentation reviewed included the following:

- Desk Review Rubric – a document that maps specific legal requirements to questions that are to be addressed during a desk review.

- Desk review procedures – a document that defines the process of conducting a desk review, from the assignment of the desk review to the completion of a final desk review report.

- Quality Rubric – procedural guidance at the compliance indicator level to assist TEA staff in applying consistent criteria in determining compliance. The "quality" aspects of this rubric include criteria to meet "proficiency" as well as "best practice." Ultimately, if LEAs are not at best practice, TEA will provide technical assistance or other guidance regarding best practices related to each prioritized area of compliance. This approach reinforces the Agency's approach to helping LEAs improve their practices in addition to monitoring them.

- Desk review report – the primary output of the desk review process that is subject to multiple stages of review before publication. (As of March 14, 2022, Cycle 3 Group 1 reports have not been posted to TEA's website.)

- Updated Review and Support organizational chart – that defines the alignment of positions responsible for conducting desk reviews.

- List of desk review data sources – that are made available to Review and Support staff through the Texas Education Agency Login (*TEAL*) online platform.

- Training materials – used to provide formal and informal training to ensure fidelity of implementation of desk review procedures.

- Description of information systems used to support the performance of desk reviews – including *Ascend*, the primary platform for assembling information and conducting compliance verification, and ultimately will be used to support report development activities. The Agency provided read-only access to *Ascend* to the Evaluation Team in March 2022.

Interviews were conducted with Review and Support managers to develop desk review process maps, in order to better understand the tools and systems used to support the process. The Evaluation Team developed process maps for the cyclical and targeted desk review processes and validated them with TEA.

Desk Review Process Analysis

Overall, the desk review processes improved between 2020-21 and 2021-22. *Ascend* has more functionality, contributing to more efficient work processes. Review and Support continues to modify and improve its procedures, protocols, and information systems.

There are two types of desk reviews – cyclical and targeted. Cyclical reviews are comprehensive reviews conducted for every LEA on a six-year cycle, resulting in approximately 200 cyclical audits annually. Cyclical reviews are intended to provide a comprehensive analysis of the LEA's special education program including a review of the LEA's special education policies and practices. An on-site review may be conducted based on the LEA's historic performance data, including prior year's RDA determinations and indicators of performance. The comprehensive on-site review is designed to evaluate LEA areas of compliance and the implementation of the LEA's Dyslexia program aligned to federal and state requirements.

Targeted reviews are driven by RDA findings based on the analysis of RDA metrics. These activities are focused on the specific areas where improvement is needed, and align continuous improvement supports, with focused compliance monitoring activities where RDA data indicates a performance concern in the LEA's special education program.

A targeted on-site review may be conducted based on the LEA's RDA determination level, results of the targeted desk review, and historical LEA performance data. The targeted on-site review is designed to analyze LEA performance on the RDA indicator(s) identified as areas of need and indicators that align to IDEA requirements.

The process starts with the assignment of R&S staff, the notification to the LEA, and the collection of information. RDA and other LEA profile information is downloaded from TEAL, the TEA data storage platform. Information is also collected directly from the LEA, including a sample of student IEP files selected by TEA. Most of the data requested is uploaded by LEAs through the *Ascend* platform. An LEA parent survey is executed through *Qualtrics* during cyclical reviews.

R&S Specialists conduct desk reviews using *Ascend*, completing answers for each applicable compliance indicator across the compliance areas, based on their review of student IEP files and other information collected. Identifications of non-compliance are reviewed with managers. If additional compliance determination support is needed, the matter is escalated to the Compliance Review Team for review, discussion, and determinations. In rare occasions, the TEA Legal Department may become engaged for consultation and support. LEA best practices and areas for Technical Assistance are also identified during the desk review process. All of these results are then incorporated into a final desk review report, which is internally reviewed and approved and then posted on the Agency's web site.

Figures 11 and 12 present process maps of the 2021-22 cyclical and targeted review processes, respectively. These maps present a logical flow of each process, but are not intended to reflect a timeline of events.

The cyclical and targeted processes are similar, with three primary differences. First, the targeted review is risk-based, and accordingly driven by the RDA indicators. The cyclical reviews are conducted every six years regardless of the RDA indicators. Second, the cyclical desk review process includes a parent survey. These are not conducted under targeted reviews. Third, comprehensive LEA policy reviews are part of the cyclical review process but not the targeted review process.

Several important changes were made in 2021-22 with respect to the desk review processes depicted above:

- Beginning 2021-22, the TEA Data Reporting Team began selecting the student sample for LEA IEP files. In prior years, the LEAs made the selection. By controlling the sample selection, TEA now appropriately controls all elements of compliance testing. The Data Reporting Team's responsibilities for determining the sample size remain unchanged in 2021-22.

- Beginning in 2021-22, *Ascend* is used to receive and upload from LEAs. In prior years *ShareFile* was used. *ShareFile* continues to be used as a backup as needed. As a result of this change, the Desk Review Planning Tool – a template previously used by LEAs to support their selection of student IEP files – is no longer necessary and was removed from the process. This new approach is more efficient from a processing standpoint and a viewing standpoint, in that a separate upload platform is no longer needed, and all IEP folders can now be viewed directly on *Ascend.*

- In 2021-22, functional software enhancements now allow Review and Support TEA Program Specialists to enter the results of the IEP review directly into *Ascend*. This eliminates the need for separate spreadsheets to track the compliance testing results (used in 2020-21).

All other cyclical and targeted reviews processes are fundamentally the same as the 2020-21 year.

The following legend defines the shape types applied on the following graphics:

| TEA Process | System or Software | Form or Spreadsheet | Organizational Unit | Decision Point | External Process |
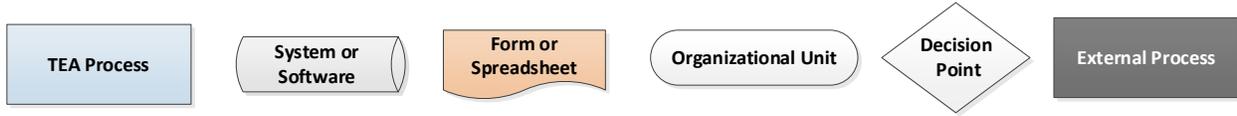
Figure 11. Cyclical Desk Review Process Map, 2021-22
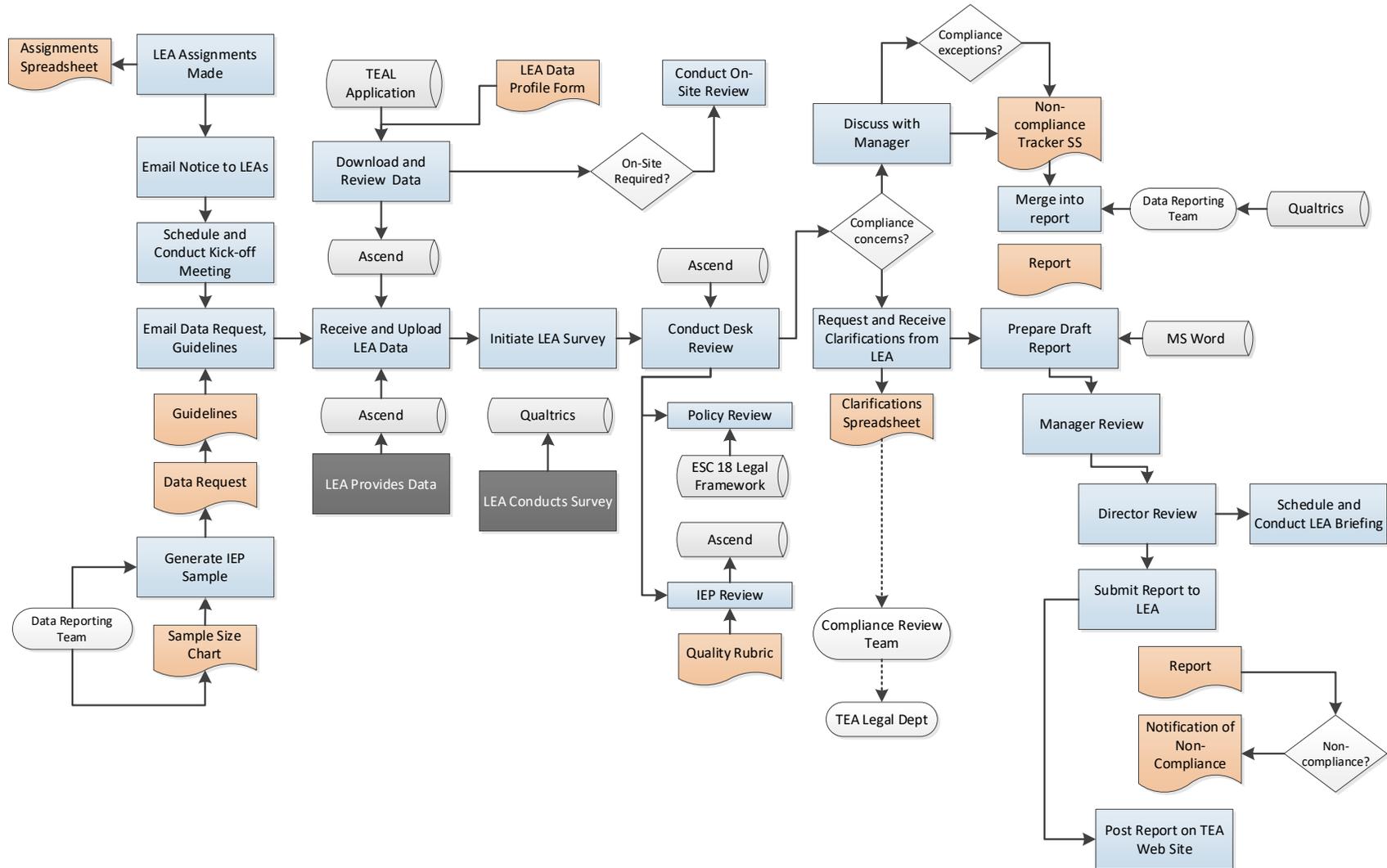
Note. Process map is not intended to depict a timeline of events.

Source. Developed by Gibson Consulting Group based on the review of desk review documentation and interviews with R&S staff

Figure 12. Targeted Desk Review Process Map, 2021-22
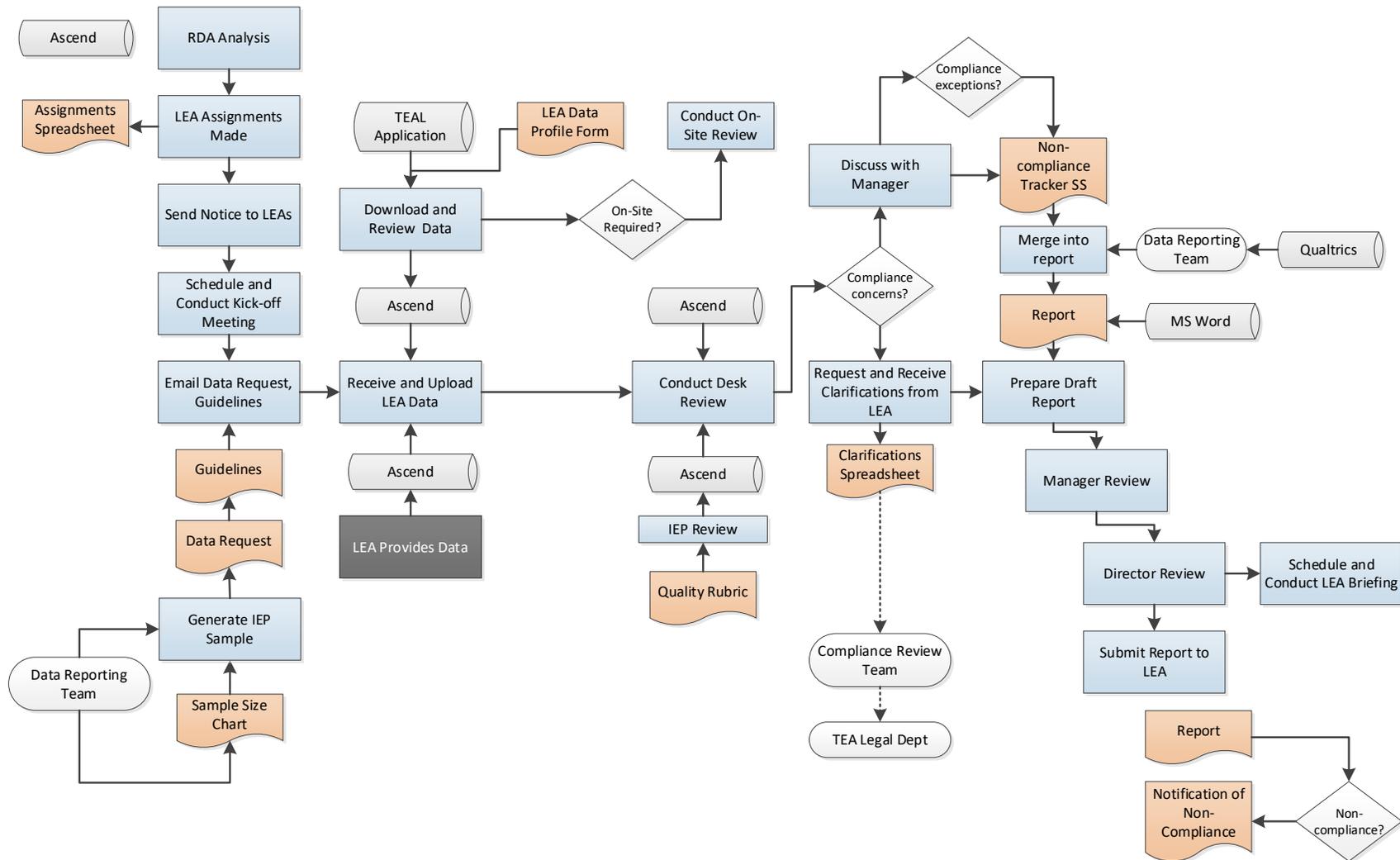
Note: Process map is not intended to depict a timeline of events.

Source: Developed by Gibson Consulting Group based on the review of desk review documentation and interviews with R&S staff

Figure 13 presents the 2021-22 cyclical desk audit process with numerical references (in black circles). These references point to a potential process improvement opportunity or evaluative comment related to the desk review process, which are described below:

1. Spreadsheet tools are currently used to support desk review management activities; however, the implementation of the *Ascend* reporting feature and Technical Assistance Dashboard will eliminate the use of the compliance tracking, staff assignments, and Quality Rubric spreadsheets.

2. Most LEAs upload supplemental documents through the *Ascend* Texas application; however, if LEAs are experiencing issues with an upload, *ShareFile* is provided as an alternative and the TEA Specialist, in most cases, uploads the artifacts into *Ascend*. LEAs engaging in monitoring activities have a two-week window to upload their initial submissions into the *Ascend* Texas application. Additionally, desk review resources contain a disclaimer indicating the sample should not be altered prior to submission.

3. The Quality Rubric (different from the TEA Desk Review Rubric) will be integrated into the Technical Assistance Dashboard and launched in Fall 2022. The TEA Quality Rubric will assist LEAs and R&S Specialists at TEA in evaluating improvement in the implementation of the compliance over time. Through reflection guided by the rubric, LEAs will be able to increase their fidelity of implementation of federal and state requirements.

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

Figure 13. TEA Cyclical Desk Review Process, March 2022
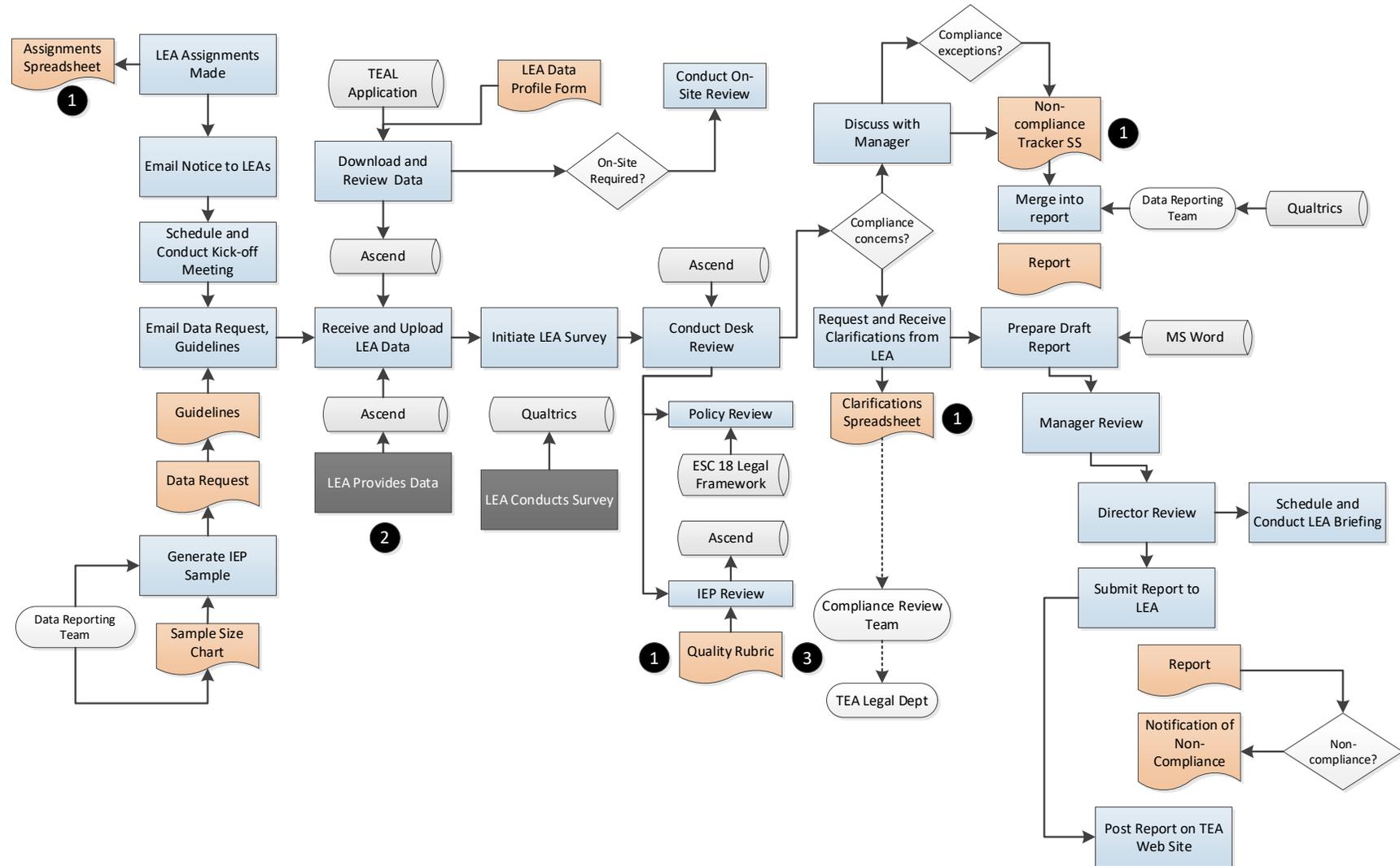
Notes. (1) Reference numbers are described on preceding page, and (2) Process map is not intended to depict a timeline of events.

Source. Prepared by Gibson Consulting Group, Inc based on TEA documents and interviews with R&S staff

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

Other Monitoring Observations

This section contains additional, lower-level observations made by the Evaluation Team. It is important that these observations be read in the context of the above major program strengths, as most of these observations relate to detailed implementation considerations that could improve operating efficiency and fidelity of implementation. The following observations are based on information provided by TEA, information learned from the Evaluation Team's direct read-only access to *Ascend*, input from LEAs, and input from R&S staff. They are organized in the following categories:

- Desk Review Rubric/Compliance Indicator Observations

- *Ascend* Observations

Desk Review Rubric/Compliance Indicator Observations

- Some compliance indicators contain vague language, have duplicated compliance questions, or are otherwise more challenging to determine compliance. For example, four indicators contain the word "clear" or "clearly" with respect to the documentation's content. These words place the determination of what is clear or appropriate on the judgment of the R&S Specialist.

- "Nested" indicators are utilized within the desk review in *Ascend*. Nested indicators are conditional; they are applicable only if the initial question is answered a certain way, triggering the "nested" question to populate. The number schema within *Ascend* for the conditional questions could be improved upon. *Ascend* treats some nested questions as subsets to indicators (i.e., 1a) while treating them as separate item numbers (i.e., 1, 2) in others. This numbering approach makes it appear that certain indicators might have been inappropriately skipped since they are not nested under the primary indicator.

- "N/A" not always an option on *Ascend* when the condition exists. This was determined by the Evaluation Team's review of *Ascend*, and confirmed by R&S Specialists during interviews.

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

Chapter 5: Desk Review Implementation Fidelity

The core activity of the desk review is the analysis of student Individual Education Program (IEP) files for compliance. To evaluate the implementation fidelity of TEA's IEP file review process, the Evaluation Team sought to replicate the process by following the same procedures and decision rules as the TEA Specialists performing the work.

Overall, the Evaluation Team agreed with TEA's assessment of individual compliance indicators in 3,458 out of 3,576 instances evaluated, or 96.7 percent of the time. Exception rates (3.3 percent overall) varied across LEAs and across the eight compliance areas. This overall agreement rate at the most granular (indicator) level of work is exceptional, given the early stages of implementation, the development of new procedures and information systems, and significant growth in R&S staff over the past three years.

There were disagreements with TEA's determination of compliance (where the Evaluation Team identified non-compliance), and TEA's determination of non-compliance (where the Evaluation Team identified sufficient evidence to support compliance).

The impact of the disagreements, although a small percentage of total indicators evaluated, could have a more significant impact at the student and LEA levels. The Evaluation Team identified at least one exception in each of the 65 student IEP files reviewed during this evaluation, and five LEAs (out of 13 sampled) determined by TEA to be compliant had exceptions noted by the Evaluation Team. These exceptions may or may not affect the LEA's overall rating by TEA as "fully compliant" since the Evaluation Team's determination of compliance was made only at the indicator level. Accordingly, no LEA-level or systemic-level compliance monitoring findings can be made from the implementation fidelity analysis.

The remainder of this briefing document presents an overview of TEA's decision rules in determining student-level and LEA-level compliance, the LEA sample selection, the evaluation objectives and approach, and the evaluation results.

TEA Compliance Decision Rules

Depending on the number of students with disabilities served by the LEA in its special education program, TEA may select a sample of up to 24 students for IEP file review. The list of students selected is provided to the LEA, the LEA submits the IEP files through *Ascend*, and the R&S Specialists access the files through *Ascend* to conduct their review.

The determination of compliance is made by TEA at the IEP file level and at the LEA level, and specific decision rules distinguish different levels of non-compliance. These decision rules are explained below.

According to TEA procedures, compliance shall be determined based on the following criteria. LEAs may determine the following:

- Student files with at least one non-compliance citation shall be filtered according to the seven priority areas (Evaluation, IEP Implementation, Properly Constituted ARD, IEP Content, IEP Development, State Assessment, Transition);

- The numerator for each priority area shall be the number of students with compliance (students excluded from the numerator for a priority area have at least one area of noncompliance for that priority area);

- The denominator for each priority area shall be the maximum number of students with files reviewed for that priority area but should not exceed the desk review sample size. The denominator may be different for each priority area;

- The numerator shall not be equal to or larger than the denominator when noncompliance for at least one citation is identified for a priority area;

- For IEP file level noncompliance, the numerator shall be two or fewer (<=2) than the denominator for a citation with non-compliance in a priority area;

- For LEA systemic level noncompliance, the numerator should be more than two (>2) fewer than the denominator for a citation with noncompliance in a priority area; and,

- Percentages shall be calculated for the number of compliant folders out of all folders reviewed for each priority area.

In essence, TEA distinguishes systemic non-compliance as recurring non-compliance. For example, if one IEP file out of 15 shows non-compliance in a priority area, it is treated as an LEA procedural exception and not systemic non-compliance. The LEA is afforded the opportunity to correct this exception by providing additional documentation. Systemic non-compliance is just that – it represents a pattern of non-compliance across the sample.

If individual determinations of non-compliance within a priority area do not exceed the threshold, and the LEA successfully addresses the non-compliance within a prescribed deadline, the LEA receives a compliance status of "Pre-finding Corrected" and no further action is required. If compliance is not addressed, then a determination of "Non-compliant" is made and a CAP is required. All systemic non-compliance is treated as "Non-compliant" and a CAP is required. Only one determination of non-compliance will drive an LEA overall compliance status of "Non-compliant" and require a CAP. Otherwise, the LEA will be deemed "Compliant."

LEA Sample Selection

The Evaluation Team requested and obtained a list of TEA cyclical desk reviews from the Cycle 3, Group 1 desk reviews conducted by TEA from August 2021 through February 2022. Thirteen LEAs were judgmentally selected from this list based on the following criteria:

- Geographic (ESC Region) representation;

- Size (Student Enrollment) representation;

- Percent of students economically disadvantaged

- Percent of students with disabilities

- Unique TEA Specialist – to the extent possible the Evaluation Team selected cyclical desk reviews performed by different TEA Specialists, in order to evaluate the implementation fidelity across the Review and Support (R&S) Team. Of the 13 LEAs evaluated, there were 12 different Specialists assigned; and,

- One charter school.

Table 6 presents a profile of the LEAs selected for the cyclical desk review implementation evaluation.

Table 6. Sample Selection – Fall 2022 Cyclical Desk Reviews (Cycle 3, Group 1)

LEA Name	Region	Student Enrollment	Percent Economically Disadvantaged	# of Students with Disabilities	% of Students with Disabilities (= # SPED / Total enrollment)
Brownsville ISD	Region 1	40,765	89.2%	5,891	14.5%
Sinton ISD	Region 2	2,074	68.4%	281	13.5%
Hempstead ISD	Region 4	1,511	85.4%	137	9.1%
Beaumont ISD	Region 5	17,128	77.7%	1,546	9.0%
Karnack ISD	Region 7	143	100%	13	9.1%
Olney ISD	Region 9	707	56.2%	108	15.3%
Keene ISD	Region 11	1,082	73.9%	131	12.1%
Troy ISD	Region 12	1,571	46%	241	15.3%
Dripping Springs ISD	Region 13	7,283	8.8%	854	11.7%
Rocksprings ISD	Region 15	270	69.6%	42	15.6%
Dawson ISD	Region 17	151	70.9%	12	7.9%
Harmony Charter – El Paso	Region 19	4,141	72.6%	380	9.2%
Pleasanton ISD	Region 20	3,437	63.4%	461	13.4%

Source. TEA Desk Review Spreadsheet; TEA Texas Academic Performance Report (TAPR) 2021

For each LEA selected, the Evaluation Team selected student IEP files based on a random assignment using a random number generator.

Evaluation Objectives and Approach

The primary objective of this evaluation was to compare a sample of IEP file review results generated by TEA to those generated by the Evaluation Team, and seek to understand the differences. A secondary objective was to evaluate the implementation fidelity of desk review procedures across members of the Review and Support (R&S) team. Since only two of the thirteen LEAs selected were reviewed by one Specialist (all others were reviewed by separate Specialists), the evaluation differences across LEAs are used as a proxy for implementation fidelity across Specialists.

The Evaluation Team was provided read-only access to *Ascend*, TEA's online application used by R&S Specialists to record compliance at the indicator level across the following eight compliance areas:

1. Evaluation

2. IEP Implementation

3. Properly Constituted ARD

4. IEP Contents

5. IEP Development

6. State Assessment

7. Transition

8. Behavior

To the degree possible, the Evaluation Team replicated this process, reviewing student IEP files and determining compliance for each applicable compliance indicator using the same documentation used by R&S staff to determine compliance. However, since the Evaluation Team could not duplicate all R&S monitoring activities, such as communications with the LEAs, there are some limitations inherent in this work.

Two members of the Evaluation Team coded 65 student IEP files (five each) for 13 LEA cyclical desk reviews. To achieve inter-rater reliability among the Evaluation Team coders, each coder independently coded the same student file. After reaching acceptable agreement rates, each coder completed five student IEP files from different LEAs. The Evaluation Team coders noted areas of disagreement and met with the applicable R&S Specialist in an attempt to rectify the disagreements. During those sessions, the Evaluation Team and R&S Specialists came to an understanding on the basis for TEA coding, but the Evaluation Team coders noted that several disagreements were attributed to how the R&S Specialist interpreted the specific components. The Evaluation Team proceeded to complete the remaining 12 LEA cyclical desk reviews.

Across 13 total LEAs selected, 3,576 instances of applicable indicator compliance were evaluated, with an average number of indicators per LEA of 274, or 55 per IEP file. The represents approximately 54 percent of the total number of potential indicators (101) in the TEA Desk Review Rubric; however, some indicators are applicable based on the assessment of other indicators. For example, Indicator SA3 asks if the student

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

met standards on all state assessments for the previous school year. If the answer is no, there are up to five other indicators (SA3a – SA3e) that need to be addressed for selected content areas. If the answer is yes, the other five are not applicable. Figure 14 presents a distribution of the applicable indicators evaluated across the eight compliance areas. These percentages reflect only the percentage distribution of the sample, and may not be representative of the entire population.

Figure 14. Percentage Distribution of Indicators Evaluated, by Compliance Area

Compliance Area	Percentage
Properly Constituted ARD	21.2%
Evaluation	18.8%
IEP Development	17.9%
IEP Implementation	17.7%
IEP Content	8.8%
State Assessment	7.8%
Behavior	3.9%
Transition	3.9%
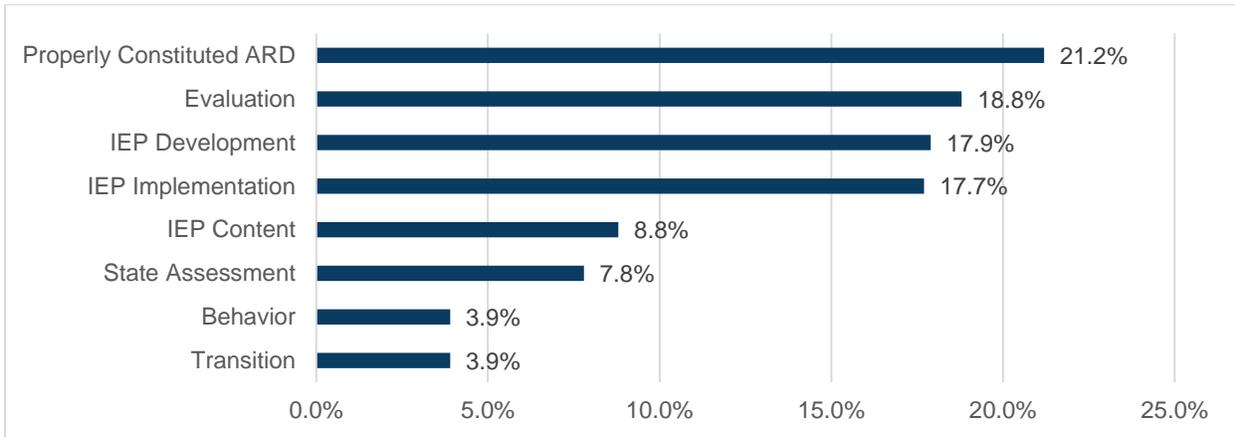
Source. Gibson Consulting Group Sample

Figure 15 presents a similar distribution of applicable indicators evaluated by LEA. The average number of applicable indicators in the sample ranged from 218 to 327, with an average (mean) per LEA of 275. The range of indicators per student IEP file, by LEA, ranged from 44 to 65 indicators.

Figure 15. Distribution of Indicators Evaluated by LEA

LEA	Indicators
Beaumont	285
Brownsville	319
Dawson	218
Dripping Springs	267
Harmony	284
Hempstead	322
Karnack	218
Keene	272
Olney	277
Pleasanton	220
Rocksprings	327
Sinton	293
Troy	274

Source. Gibson Consulting Group Sample
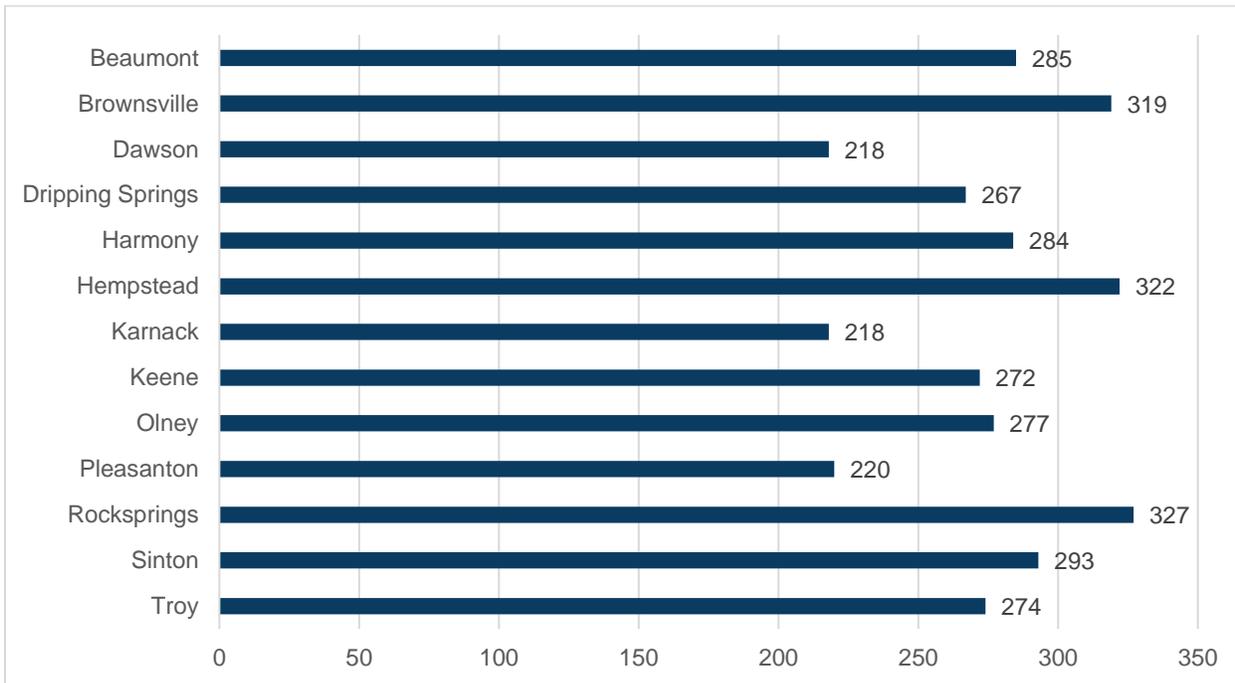
GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

Evaluation Results

This section presents the results of the Evaluation Team's assessment of TEA's IEP file review implementation fidelity. It is important to read these results in the context of the following:

- The Evaluation Team determined compliance only at the student IEP file level, representing the lowest micro-level of compliance determination. Disagreements by the Evaluation Team regarding TEA's determination of compliance may or may not affect LEA-level compliance.

- As discussed in Chapter 5, several of the compliance indicators contain vague language or complex sub-components of compliance determination. This could have caused differing interpretations by the Evaluation Team.

- TEA continues to update and improve its processes and systems. For example, the Quality Rubric is still in development, and when complete, this document will be incorporated into *Ascend* and provide more specific guidance on compliance decision criteria at the indicator level.

TEA's compliance determination was compared to the Evaluation Team's compliance determination. Upon completion of the items sampled, observations were made with respect to the implementation fidelity of how certain indicators were tested for compliance.

Evaluation Exceptions

For purposes of this evaluation, an exception is defined as a disagreement by the Evaluation Team with TEA's assessment of indicator compliance. Out of 3,576 applicable indicators evaluated, 118, or 3.3 percent were determined to be exceptions the Evaluation Team made with respect to TEA's determination of compliance. Most of the exceptions related to TEA's determination of compliance, but some exceptions were also made with respect to TEA's determination of non-compliance.

Approximately 54 percent (35) of the 65 student IEP files reviewed had at least one exception, and all 13 LEAs had at least one compliance exception based on the Evaluation Team's assessment. Eight of the 13 LEAs were identified by TEA as having at least one area of non-compliance in the final desk review report presented on TEA's web site. Five of the 13 LEAs (38 percent) were identified by TEA as being fully compliant in their respective desk review reports. However, as stated above, the Evaluation Team's review was performed at the student IEP file level, and this may or may not have resulted in a different LEA-level compliance rating. Table 7 presents the list of LEAs by region, TEA's identification of any non-compliance, and the Evaluation Team's exceptions.

Table 7. LEA Compliance Comparison, TEA and Gibson / AIR Evaluation Team, Group 3 – Cycle 1 Desk Review Sample

LEA Name	Region	Non-Compliance Identified by TEA	Exceptions Identified by the Evaluation Team	Number of IEP Files with Exceptions (of 5 sampled per LEA)
Brownsville ISD	Region 1	No	Yes	5/5
Sinton ISD	Region 2	Yes	Yes	5/5
Hempstead ISD	Region 4	No	Yes	3/5
Beaumont ISD	Region 5	No	Yes	4/5
Karnack ISD	Region 7	Yes	Yes	2/5
Olney ISD	Region 9	No	Yes	2/5
Keene ISD	Region 11	No	Yes	1/5
Troy ISD	Region 12	Yes	Yes	1/5
Dripping Springs ISD	Region 13	Yes	Yes	3/5
Rocksprings ISD	Region 15	Yes	Yes	1/5
Dawson ISD	Region 17	Yes	Yes	2/5
Harmony Charter – El Paso	Region 19	Yes	Yes	4/5
Pleasanton ISD	Region 20	Yes	Yes	2/5

Sources. TEA Cyclical Desk Review Reports, Cycle 3, Group 1; Gibson Evaluation of Sample LEAs

While the overall exception rate was 3.3 percent, the range of exception rates varied across compliance areas. Figure 16 presents exception rates by compliance area, which ranged from 1.27 percent for IEP Content to 8.63 percent for Transition.

Figure 16. Desk Review Evaluation Exception Rates, by Compliance Area
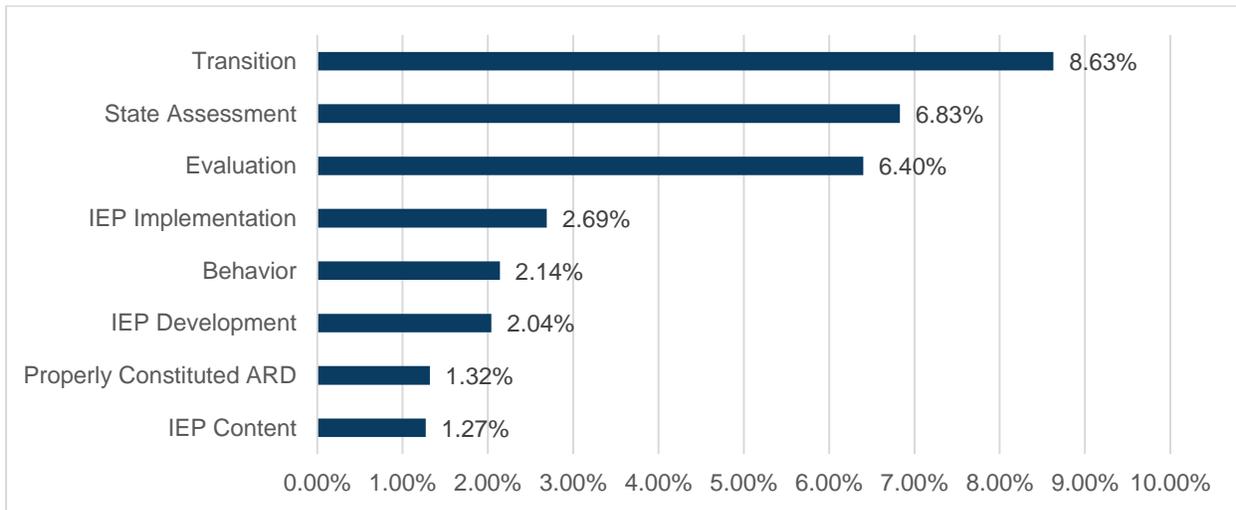
Source. Gibson Consulting Group Sample

Exception rates also varied by LEA. Figure 17 presents exception rates by LEA, showing a range of 0.31 percent for Rocksprings to 9.16 percent for Harmony.

Figure 17. Desk Review Evaluation Exception Rates, by LEA
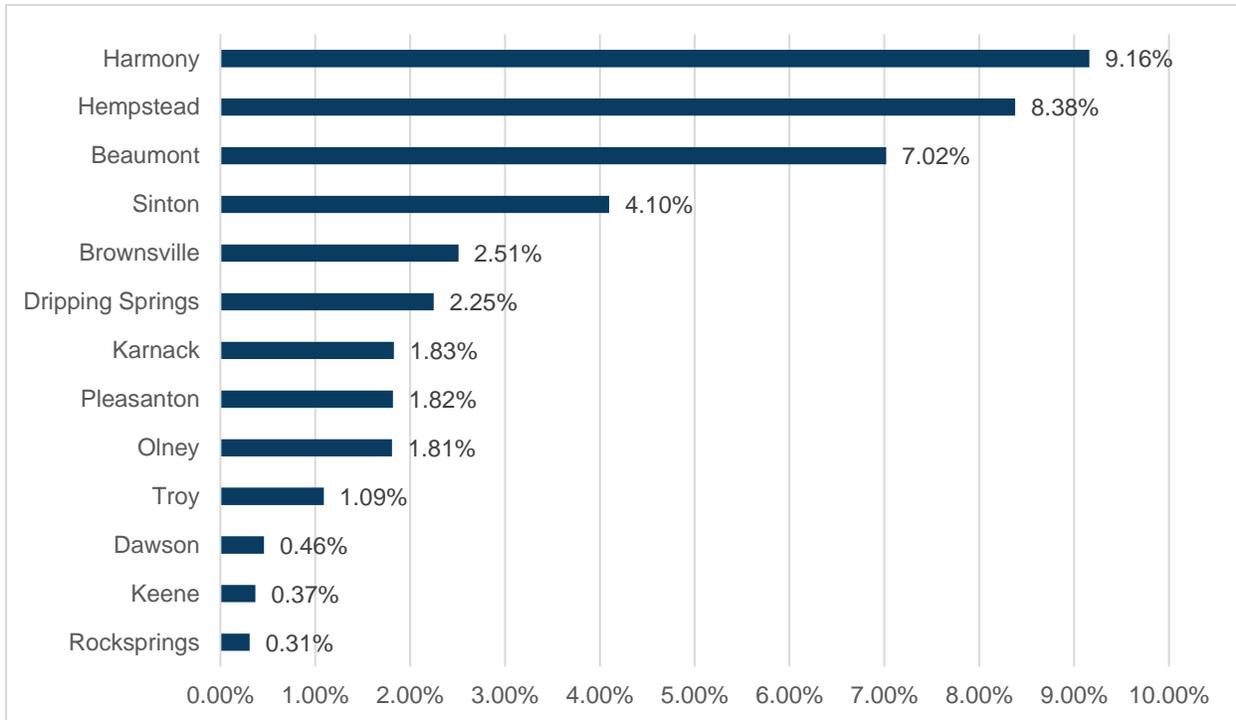
Source. Gibson Consulting Group Sample of LEA Cyclical Desk Reviews

Exceptions noted by the Evaluation Team reflected differences in TEAs determination of compliance as well as non-compliance. For example, compliance indicator SE2 asks, "Was a review of existing evaluation data (REED) completed by the IEP team and other qualified professionals?" TEA marked "No." However, the Evaluation Team noted that the REED documentation was included in the supporting documentation and accordingly marked "Yes." In another example, compliance indicator IE2 asks, "Was the parent/guardian provided a copy of the Notice of Procedural Safeguards in their native language at least annually?" TEA marked "Yes," while the Evaluation Team found no evidence in the IEP file and accordingly marked "No."

Chapter 6: Operational Recommendations

This Chapter presents opportunities to further improve TEA's monitoring practices as it continues to implement the Special Education Strategic Plan. Since all evaluation questions were answered in the affirmative, none of the recommendations below are needed to meet the requirements of the Plan. However, the Evaluation Team makes these suggestions to further improve the implementation of the Plan.

Recommendation 1: Develop an LEA Special Education staffing capacity analysis, beyond the required certification checks.

While staffing (certification) compliance is addressed in the current monitoring system, there is an opportunity to increase breadth of staffing information to support the LEA data profile in the desk review process. TEA collects staffing data from LEAs through the state reporting process (TSDS/PEIMS) that could support a robust staffing analysis. This may not include all LEA staff resources, such as contracted resources, but might offer insights into LEAs' ability to sustain compliance and improve student outcomes.

Below are suggested staff ratios with a description of their benefit to the monitoring process. These measures, analyzed over time, may help support the identification of unfavorable staffing trends that could be adversely affecting LEA compliance or performance. Comparisons across (higher performing) peer LEAs could also help identify possible under- or over-staffing situations.

Suggested measures for LEA staffing analysis:

- Total SWD[8] (Headcount) / Total SPED Teacher FTEs (Full-Time Equivalency) – this ratio is the pupil-teacher ratio for the Special Education program, and measures teacher utilization on a student headcount basis.

- Total SWD (FTSE) / Total SPED Teacher FTEs – this ratio is the pupil-teacher ratio for the Special Education program, and measures teacher utilization on a student full-time student equivalent (FTSE) basis (obtained from the LEA Summary of Finances Report). Because of the variation in the quantity of services for students with disabilities – based on need – the FTSE measure is important because it represents a stronger relationship between resources needed and cost.

- Total SWD (Headcount) / Total SPED Staffing FTEs – similar to the pupil-teacher ratio, this ratio shows overall staff utilization for the Special Education Program on a student headcount basis.

- Total SWD (FTSE) / Total SPED Staffing FTEs – similar to the pupil-teacher ratio, this ratio shows overall staff utilization for the Special Education Program on an FTSE basis.

- Total SWD (Headcount) / Total SPED Aide FTEs – this ratio is the pupil-aide ratio for the Special Education program, and measures aide utilization on a student headcount basis.

---

[8] SWD = Students with Disabilities.

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

- Total SWD (FTSE) / Total SPED Aide FTEs – this ratio is the pupil-aide ratio for the Special Education program, and measures aide utilization on an FTSE basis.

- Staff composition FTE and percentages of total LEA Special Education Program FTEs (using role ID codes from TSDS/PEIMS).

  - Special Education Teacher

  - Special Education Aide

  - Special Education Services (e.g., Occupational Therapist, Speech Therapist, Educational Diagnostician)

  - Administration (e.g., Executive Director, Component/Department Director)

  - Other Staff (e.g., Specialist/Consultant, Other District Exempt Professional Auxiliary)

The above information could be added to the LEA data profile at the beginning of the desk review process, showing historical trends and comparison to peer group averages. Including this information in the desk review report could help inform LEA budget decisions regarding LEA staffing for Special Education

Recommendation 2: Conduct internal tests of implementation fidelity to help ensure continuous improvement of the desk review process.

The case study interviews and the implementation fidelity evaluation of student IEP files both suggest that opportunities for improved implementation fidelity exist. TEA should consider replicating the implementation fidelity testing conducted during this project to proactively monitor the consistent determination of compliance and the impact of any incorrect determinations. The results of this testing can be used to inform training needs at the department and staff levels.

Recommendation 3: Enhance *Ascend* management reporting capabilities.

The *Ascend* information system is tracking rich information that can inform decision-making for TEA's R&S unit. Currently, operating statistics such as compliance exception rates, by compliance area, by LEA, and by compliance indicator are tracked on spreadsheets – without the ability to conveniently aggregate the data for global reporting. TEA is taking steps to track this information through *Ascend* and generate these and other management reports to support decision-making. However, this work was not complete at the date of this report. The Evaluation Team supports this initiative, and believes R&S would benefit from global operating statistics and trends on desk reviews. Below are examples of suggested data or metrics to track:

- The number of indicators evaluated – this is the primary driver for the volume of work. Many compliance indicators are not applicable for student IEP files selected. This data should be tracked by cycle, group, compliance area, and by LEA to evaluate TEA's coverage of all the compliance areas globally and across LEA size (based on number of students with disabilities).

- Compliance exception rates, by cycle, by group, by type (Pre-Finding Corrected vs. Non-Compliance), by compliance area, by LEA, by region, by compliance indicator, and by R&S

Specialist – this information will inform global and regional technical support needs by LEAs. Wide variances across Specialists within compliance areas might point to training needs as well.

▪ Percentage of LEAs with active Corrective Action Plans, end-of-year, by region – this metric would support training and support needs for LEAs by ESCs.

Recommendation 4: Extend operational controls to ensure alignment across TEA monitoring procedural documents.

As there are several documents used to support the evaluation of compliance at the indicator level (e.g., Desk Review Rubric, *Ascend* platform, TEA Quality Rubric), the R&S team should expand its quality control checks to ensure the indicator language, applicable citations, and nesting structure are consistent across these documents.

Recommendation 5: Evaluate the feasibility of controlling student IEP files immediately after selection to prevent LEA changes before submission.

In 2021-22, TEA changed the way the student IEP file sample was selected. In prior years, LEAs were allowed to select the sample based on TEA-defined criteria. Starting in 2021-22, TEA began selecting the students to reduce the chance of LEAs "cherry-picking" files for compliance testing. This improved control mechanism worked, as this appears to have been one factor contributing to higher compliance exception rates in 2021-22 than the prior year.

LEAs still have the opportunity, however, to alter the files for up to two weeks after they receive the list of sampled student IEP files from TEA. LEAs must sign a statement that no such alteration has occurred, but this is not the most effective control (commonly referred to as a compensating control) to prevent it. To further reduce this risk, TEA should consider providing the list to the LEA at a time when LEA staff can pull the files and immediately post to *Ascend*. This would further reduce the risk of LEA student file alteration before submission to TEA. The Agency should pilot test this approach before implementation to evaluate the impact on LEA and TEA staff requirements, as well as any other potential constraints.

Appendix A: LEA Interview Guides

LEA Superintendent or District Coordinator for School Improvement (DCSI)

Introductions (10 mins)

1. Please state your name, your current title and role in the LEA, and how long you have been in your position(s).

2. What are the major issues your LEA faces with respect to the monitoring and compliance of your special education program that might be preventing students from receiving high-quality special education services in your LEA?

Communications related to the new statewide special education monitoring system

3. Please describe your role in the most recent TEA special education monitoring process?

4. Can you explain why your LEA was identified for special education monitoring by the Texas Education Agency?
   a. What, if any, aspects of your special education program were identified as needing improvement?

5. Were you directly involved in TEA special education monitoring activities at any point prior to 2018, when the new monitoring system was developed?
   a. If yes, how would you describe the clarity of communications regarding what was required of your LEA when thinking about pre-2018 monitoring activities and the process you are currently engaged in?

6. How did TEA communicate with you at the start of the monitoring process?
   a. In retrospect, what was effective and useful to you as you worked with TEA through the process?

7. How did TEA communicate with you after monitoring findings were delivered to your LEA?
   a. In retrospect, what was effective and useful to you as you worked to address identified issues?

8. From a LEA leadership perspective, were communications from TEA related to the special education monitoring process sufficiently clear to prepare your LEA for the audit?
   a. If not, what needs to be improved?

9. From a LEA leadership perspective, were the audit findings from TEA presented in a manner that helped your LEA improve your special education program?
   a. If not, what needs to be improved?

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

Direct experience with the new monitoring system and processes

10. If you have had prior experience with TEA special education monitoring, in what ways do you feel that the new system is improved?
    a. In what ways do you think the new monitoring system still needs to be improved?

11. Based on the feedback you were provided by TEA about your special education program through the monitoring process, what specific improvements were you able to implement?

12. To what extent did the TEA Review and Support team highlight areas where your special education program demonstrated clear success? Please elaborate on successes or best practices that TEA highlighted in your review.

13. Were the financial implications of findings from the TEA monitoring process clearly delineated?
    a. How did your LEA reallocate funds to address changes that were required by the monitoring audit?

14. Concerning the monitoring process, what do you think TEA did particularly well?

15. With respect to the monitoring process, what would you like to see TEA do differently that would benefit your LEA's special education program?

Reflection on how the monitoring and support processes are impacting compliance and quality of service outcomes

16. As a result of the recent monitoring process, did you change any of your LEA processes to promote compliance or best practices in special education?

17. What impact did the recent special education monitoring process have with regard to improving compliance with IDEA regulations?
    a. How about changes that have advanced best practices in special education in your LEA?

Closing

18. Is there anything else you would like to share that would help TEA in its effort to continually improve the special education monitoring system and processes?

GIBSON

AN EDUCATION CONSULTING & RESEARCH GROUP

LEA Chief Financial Officer

Introductions

1. Please state your name, your current title and role in the LEA, and how long you have been in your position(s).

Communications related to the new statewide special education monitoring system

2. Please describe your role in the most recent TEA special education monitoring process.
   a. At what point in the monitoring process did you become involved (e.g., initial communications, compiling documents for the TEA review, participation in site visit interviews, reviewing findings for financial implications)?

3. What, if any, aspects of your special education program were identified as being out of compliance?

4. Were you directly involved in TEA special education monitoring activities at any point prior to 2018, when the new monitoring system was developed?
   a. If yes, how would you describe how the clarity of communications regarding what was required of your LEA when thinking about pre-2018 monitoring activities and the process you are currently engaged in?

5. How did TEA communicate with you after monitoring findings were delivered to your LEA?
   a. In retrospect, what communication methods were effective and useful to you as you worked to address identified issues?

Direct experience with the new monitoring system and processes

6. If you have had prior experience with TEA special education monitoring, in what ways do you feel that the new system is improved?
   a. In what ways do you think the new monitoring system still needs to be improved?

7. Based on the feedback you were provided by TEA about your special education program through the monitoring process, what specific improvements were you able to implement and are in the process of implementing?
   a. Do you have any estimates of the fiscal impact of implementing TEA recommendations or requirements?
   b. What did you have to do or will have to do from a budgeting perspective to pay for the required changes?
   c. Has the LEA made other changes (having no or little fiscal impact) that have helped address TEA findings?
   d. Did your department seek the advice of TEA, your regional ESC, or other organizations to problem-solve how to pay for required changes the LEA was required to make as a result of the monitoring audit.

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

8. What challenges did you encounter during the TEA monitoring process, and how did you overcome them?
   a. Did you receive external assistance from your regional ESC or other technical assistance providers to resolve challenges? If so, please elaborate.

9. Concerning the most recent monitoring process, what do you think TEA did particularly well?
   a. What would you like to see TEA do differently that would benefit your special education program?

Reflection on how the monitoring and support processes are impacting compliance and quality of service outcomes

10. What impact has the recent special education monitoring process had with regard to improving compliance with IDEA regulations?
    a. How about any changes resulting from the monitoring process that have advanced best practices in special education in your LEA?

11. To what extent did you find the monitoring team at TEA to be supportive of your efforts to improve various components of your special education compliance and programming?

Closing

12. Is there anything else you would like to share that would help TEA in its efforts to continually improve the special education monitoring system and processes?

GIBSON

AN EDUCATION CONSULTING & RESEARCH GROUP

LEA Special Education Director

Introductions

1. Please state your name, your current title and role in the LEA, and how long you have been in your position(s).

2. What are the major issues your LEA faces with respect to the monitoring and compliance of your special education program that might be preventing students from receiving high-quality special education services in your LEA?

Communications related to the new statewide special education monitoring system

3. Please describe your role in the most recent TEA special education monitoring process?

4. Can you explain why your LEA was identified for special education monitoring by the Texas Education Agency?
   a. Were the various steps and processes associated with the monitoring activities clearly explained to you and your staff? If not, what was unclear?
   b. What, if any, aspects of your special education program were identified as needing improvement?

   Note: If an issue was identified in Q4b, please ask for the contact information for Special Education Specialists that will need to be contacted for interviews related to their experiences with TEA in the issue identification, communication, and resolution process.

5. Were you directly involved in TEA special education monitoring activities at any point prior to 2018, when the new monitoring system was developed?
   a. If yes, how would you describe the clarity of communications regarding what was required of your LEA when thinking about pre-2018 monitoring activities and the process you are currently engaged in?

6. How did TEA help you and your staff understand the key components of the new monitoring system and what was expected from your LEA?
   a. Did your regional ESC help you navigate the various aspects of the new special education monitoring process? If so, how?

7. How did TEA communicate with you at the start of the monitoring process?
   a. In retrospect, what was effective and useful to you as you worked with TEA through the process?
   b. What was your experience with uploading documents for TEA review? In what ways could this process be improved?

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

8. How did TEA communicate with you after monitoring findings were delivered to your LEA?
    a. In retrospect, what was effective and useful to you as you worked to address identified issues?

Direct experience with the new monitoring system and processes

9. If you have had prior experience with TEA special education monitoring, in what ways do you feel that the new system is improved?
    a. In what ways do you think the new monitoring system still needs to be improved?

10. Please walk me through the various steps of the TEA special education monitoring process/audit.
    a. Were you notified by TEA of an issue with your program that needed to be corrected or improved? If so, what was that issue, and how were you notified?
    b. What happened next – Did the TEA Review and Support team connect you with technical assistance and resources that would help you to resolve any identified issues?
    c. What supports were made available to you regarding technical assistance around a particular area of concern?
    d. To what extent did the TEA Review and Support team escalate support to a significant challenge your LEA was experiencing? Please explain.
    e. To what extent did the TEA Review and Support team highlight areas where your special education program demonstrated clear success? Please elaborate on successes or best practices that TEA highlighted in your review.

11. Based on the feedback you were provided by TEA about your special education program through the most recent monitoring process, what specific improvements were you able to implement?

12. What challenges did you encounter during the most recent TEA monitoring process, and how did you overcome them?
    a. Did you receive external assistance from your regional ESC or other technical assistance providers to resolve challenges? If so, please elaborate.

13. What do you think TEA did particularly well in the most recent monitoring process?
    a. If you utilized the services of your region ESC, what did they do well to help you through the monitoring process?

14. With respect to the most recent monitoring process, what would you like to see TEA do differently that would benefit your special education program?
    a. If you utilized the services of your region ESC, what would you like to see them do differently to help you through the monitoring process?

Reflection on how the monitoring and support processes are impacting compliance and quality of service outcomes

15. What impact did the recent special education monitoring process have with regard to improving compliance with IDEA regulations?
    a. How about changes that have advanced best practices in special education in your LEA?

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

16. To what extent did you find the monitoring team at TEA to be supportive of your efforts to improve various components of your special education programming?

Closing

17. Is there anything else you would like to share that would help TEA in its effort to continually improve the special education monitoring system and processes?

LEA Special Education Program Specialist

Introductions

1. Please state your name(s), your current title(s), and role(s) in the LEA, and how long you have been in your position(s).

2. What are the major issues your LEA faces with respect to the monitoring and compliance of your special education program that might be preventing students from receiving high-quality special education services in your LEA?

Communications related to the new statewide special education monitoring system

3. Please describe your role in the most recent TEA special education monitoring process?

4. Can you explain why your LEA was identified for special education monitoring by the Texas Education Agency?
   a. Were the various steps and processes associated with the monitoring activities clearly explained to you and your staff? If not, what was unclear?
   b. What, if any, aspects of your special education program were identified as needing improvement?

5. How did TEA help you and your staff understand the key components of the new monitoring system and what was expected from your LEA?
   a. Did your regional ESC help you navigate the various aspects of the new special education monitoring process? If so, how?

6. How did TEA communicate with you after the most recent monitoring findings were delivered to your LEA?
   a. In retrospect, what was effective and useful to you as you worked to address identified issues?

Direct experience with the new monitoring system and processes

7. If you have had prior experience with TEA special education monitoring, in what ways do you feel that the new system is improved?
   b. In what ways do you think the new monitoring system still needs to be improved?

8. Please walk me through the various steps of the most recent TEA special education monitoring process/audit.
   a. Were you notified by TEA of an issue with your program that needed to be corrected or improved? If so, what was that issue, and how were you notified?
   b. What happened next – Did the TEA Review and Support team connect you with technical assistance and resources that would help you to resolve any identified issues?

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP

   c. What supports were made available to you regarding technical assistance around a particular area of concern?

   d. To what extent did the TEA Review and Support team escalate support to a significant challenge your LEA was experiencing? Please explain.

   e. To what extent did the TEA Review and Support team highlight areas where your special education program demonstrated clear success? Please elaborate on successes or best practices that TEA highlighted in your review.

9. Based on the feedback you were provided by TEA about your special education program through the monitoring process, what specific improvements related to your specialized area and the issue identified were you able to implement?

10. Concerning the most recent monitoring process, what do you think TEA did particularly well to make program or procedural improvements related to the issue identified in your area of expertise?

11. With respect to the most recent monitoring process, what would you like to see TEA do differently to make program or procedural improvements related to the issue identified in your area of expertise?

   a. If you utilized the services of your region ESC, what would you like to see them do differently to help you through the monitoring process?

Reflection on how the monitoring and support processes are impacting compliance and quality of service outcomes (10 mins)

12. What impact did the recent special education monitoring process have with regard to improving compliance to the related to the issue identified in your area of expertise?

   a. How about changes that have advanced best practices in special education to make program or procedural improvements related to the issue identified in your area of expertise?

13. To what extent did you find the monitoring team at TEA to be supportive of your efforts to make program or procedural improvements related to the issue identified in your area of expertise?

Closing (3 Minutes)

14. Is there anything else you would like to share that would help TEA in its effort to continually improve the special education monitoring system and processes?

GIBSON
AN EDUCATION CONSULTING & RESEARCH GROUP