

EXAMINING SCHOOL ADMINISTRATORS' PERCEPTIONS REGARDING SPECIAL
EDUCATION ENROLLMENT TRENDS IN TEXAS PUBLIC SCHOOLS

A Record of Study

by

MOLLEY ANN PERRY

Submitted to the Graduate and Professional School of
Texas A&M University
in partial fulfillment of the requirements for the degree of

DOCTOR OF EDUCATION

Chair of Committee,	Daniel Bowen
Committee Members,	Jamilia Blake
	Susan Holley
	Mario Torres
Head of Department,	Mary Alfred

August 2022

Major Subject: Educational Administration

Copyright 2022 Molley Ann Perry

ABSTRACT

The purpose of this study was to examine factors contributing to special education enrollment trends in Texas over the past two decades through an examination of identification rates at state and local levels and gathering of perspectives from school personnel with direct knowledge of special education enrollment practices and the impact of federal and state policies. The study explores possible causal factors through descriptive analysis of the data and deepens understanding by interviewing key school personnel with direct knowledge of identification practices in districts during the specified timeframe.

This multi-case study relied upon publicly available data and interviews with four individuals who had direct knowledge of practices at the local level during a period of significant statewide decline in special education enrollment from the turn of the century until the 2013-14 school year. This research also describes how special education enrollment has increased significantly across the state over the past several years following findings of non-compliance by the United States Department of Education Office of Special Education Programs and the Texas Education Agency's implementation of a statewide corrective action plan.

Findings suggest that while the implementation of the Performance Based Monitoring and Analysis System had a direct and substantial impact upon district practices and a statewide decline in enrollment rates, there were other important factors that contributed to declines in enrollment. As found in this study, these other factors include the implementation of a Response to Intervention Model, substantial changes that occurred in evaluation methodology, and a narrowed application of child find requirements as required by federal statute.

Understanding why this phenomenon occurred in Texas and the ongoing effects on adequate provision of services is a crucial step in ensuring that corrective actions result in improved outcomes for students and the prevention of future under-identification of students eligible for special education services.

DEDICATION

To my mom, Judy Dodd. You wanted me to dream big, because your choice of career was limited by the social norms of the past. What I've come to learn is that education is a calling, not a career. Preparing future generations for a world that does not yet exist is the most noble of professions, and it is my honor to work alongside and serve those who have chosen this path. Thank you for modeling this throughout the years as I saw you serve countless children and their families. Your support of me throughout this journey has been unwavering and is deeply appreciated.

While I have been blessed to work with many great leaders over the years, the encouragement I received to grow in my leadership and further my education from two very special mentors has had a profound impact on my leadership journey. To Paula Butler and Clark Ealy, thank you for always believing in me.

Finally, the steadfast support and understanding of my family over the past six years has been incredible. Thank you for understanding and patience as I took this time to focus on my own growth and learning. It is my sincere hope that this journey has served as a model for my own children regarding the importance of continuous personal development and perseverance in life.

ACKNOWLEDGEMENTS

I would like to acknowledge and thank my committee members for their ongoing support of my work and research. A special thanks to Dr. Daniel Bowen, Dr. Mario Torres, Dr. Susan Holley, and Dr. Jamilia Blake for their ongoing commitment and support in completing this endeavor. While the journey has taken a bit longer than I anticipated, the outcome is worth every moment spent.

CONTRIBUTORS AND FUNDING SOURCES

Contributors

This work was supervised by a record of study committee including Dr. Daniel Bowen, committee chair, Dr. Mario Torres and Dr. Susan Holley from the Educational Administration and Human Resource Department, and Dr. Jamilia Blake from the Educational Psychology Department. All work for this record of study was completed independently by the student.

Funding Sources

There are no outside funding contributions to acknowledge related to the research and compilation of this document.

NOMENCLATURE

IDEA	Individuals with Disabilities Education Improvement Act
NCLB	No Child Left Behind
OSEP	Office of Special Education Programs
PBMAS	Performance Based Monitoring and Analysis System
RTI	Response to Intervention
TEA	Texas Education Agency
USDE	United States Department of Education

TABLE OF CONTENTS

	Page
ABSTRACT.....	ii
DEDICATION.....	iv
ACKNOWLEDGEMENTS.....	v
CONTRIBUTORS AND FUNDING SOURCES	vi
NOMENCLATURE	vii
TABLE OF CONTENTS.....	viii
CHAPTER I INTRODUCTION.....	1
Problem Statement.....	4
Purpose of the Study.....	5
Significance of the Study.....	6
CHAPTER II REVIEW OF LITERATURE	10
Variance in Identification Practices.....	10
School Accountability Systems	15
Funding Systems.....	18
CHAPTER III METHODS.....	25
Methodology.....	25
Data Sources	27
Population and Categories	28
Sample Selection Process	31
Description of Sample	31
Description of Participants.....	34
Data Collection	35
Interview Techniques.....	36
Field Notes.....	38
Data Analysis.....	38
Reliability and Trustworthiness	40
Role of the Researcher.....	41
Summary.....	41
CHAPTER IV FINDINGS	42
Summary of Methods.....	43
Results.....	43
Summary.....	78

CHAPTER V SUMMARY, DISCUSSION, CONCLUSIONS	81
Summary	81
Purpose of the study.....	83
Theoretical framework.....	83
Discussion.....	84
Summary of Findings by Participant District Context.....	101
Limitations	103
Implications for Practice.....	104
Suggestions for Further Research.....	106
Conclusions.....	107
REFERENCES	109

CHAPTER I

INTRODUCTION

During the fall of 2016, headlines in the Houston Chronicle proclaimed that Texas public schools systematically denied special education services to thousands of children with disabilities (Rosenthal, 2016). Following this seven-part series of articles, the publication pointed to the Texas Education Agency's (TEA) Performance Based Monitoring and Analysis (PBMAS) accountability system's target rate for special education identification as the impetus for declining rates of special education enrollment in Texas. Subsequently, the United States Department of Education (USDE) investigated and issued findings in that Texas failed to comply with the Individuals with Disabilities Education Act (IDEA), which obligates schools to identify and provide special education services to all eligible students with disabilities.

The USDE findings of noncompliance have serious implications for the TEA, public schools, students, and families across the state of Texas. In response, the TEA developed a Special Education Strategic Plan in April 2018, which identified a system of supports and plan for improvements. Included in this plan were strategies to improve identification, timely access to services, and outcomes for students with disabilities. The provision of these specialized services and supports to an increasing number of students requires schools to divert resources to enhance levels of staffing and allocate additional funds to meet growing needs across the state.

Although the percentage of students enrolled in special education declined following implementation of the PBMAS in 2004, this trend in Texas began five years prior to enactment of this accountability system's indicator targeting overall identification rates. Although diminishing enrollment rates in Texas are correlated with the initiation of the PBMAS target

enrollment rate indicator, further examination is necessary to provide a more comprehensive understanding of enrollment trends and special education identification practices. It is important to investigate these trends and explore why this systematic denial of services occurred in Texas to broaden understanding and inform future policies and practices surrounding identification and provision of special education services.

To understand the current context of special education identification in Texas, one must first consider the history of special education enrollment and trends at state, federal, and local levels. Special education began as a federal public policy in the United States over four decades ago with the passage of the Education for All Handicapped Children Act of 1975, also known as Public Law (P.L.) 94-142. This landmark legislation ensured children with disabilities could attend public school and provided unprecedented access to public education and garnered civil right protections for students with disabilities (Keogh, 2007). This legislation was reauthorized most recently in 2004 as the IDEA, which mandates the provision of a free and appropriate public-school education for eligible students between the ages of three and twenty-one. In addition to the guarantee of access to educational opportunities and special education services, the IDEA (2004) requires each Local Education Agency (LEA) to locate, identify, and evaluate all children suspected of having disabilities residing within the school district.

The delivery of special education services begins with the identification process. Schools conduct Full and Individual Evaluations to determine if a student meets disability condition criteria as established by IDEA and state laws. Upon completion of the Full and Individual Evaluation, a student's Individualized Education Program (IEP) committee reviews the evaluation results, considers the educational need for special education and related services, and then determines eligibility based upon the factors of both disability and need (IDEA, 2004).

Following the passage of federal legislation in 1975 to ensure equitable access to public education in the United States, a steady increase in national levels of special education identification occurred nationwide for almost three decades (National Center for Education Statistics, 2019). Students who were not previously allowed to attend school or who experienced disability-based discrimination in schools were afforded a free and appropriate public education, due process rights, non-discriminatory assessment, and an Individual Educational Plan (Keogh, 2007). Federal regulations require all children with disabilities, regardless of the severity of their disabilities, and who need special education and related services, to be identified, located, and evaluated (IDEA, 2004).

According to the National Center for Education Statistics (NCES), special education student identification grew across the United States from its inception in the mid-1970s until reaching a peak enrollment rate in the 2004-2005 school year, when 13.8 percent of all public-school students ages three through twenty-one were enrolled in special education nationwide. Identification rates then declined across the United States until the 2011-2012 school year, when they reached a rate of 12.9 percent before steadily increasing again. The most recent report from the 2019-2020 school year indicated that 7.3 million, or 14 percent of all public-school students are enrolled in special education across the nation (National Center for Education Statistics, 2021).

Texas has historically reported one of the lowest state rates of special education identification in the nation (Scull & Winkler, 2011). A review of historical data from the National Center for Education Statistics reveals that special education enrollment in Texas experienced increasing rates from the inception of special education in the mid-1970s until the 1999-2000 school year, when a peak rate of 12.2 percent was observed. By the 2007-08 school year, Texas

had the smallest percent of students identified for special education as compared to all other states in the nation with 10.2 percent of students identified. The rate in Texas continued to decline, and by the 2013-2014 school year, the lowest rate in recent history was recorded, with 8.6 percent of students identified. Subsequently, enrollment rates increased each year, and 10.7 percent of Texas public school children received special education services during the 2019-20 school year as reported in the 2019-20 Texas Academic Performance Report.

Problem Statement

When comparing national and state enrollment trends, declining special education enrollment rates began sooner and were more substantial in Texas than across the nation. This variability in special education enrollment rates in Texas as compared to other states and the nation raises questions about factors that may have contributed to underidentification. In addition to the introduction of the PBMAS accountability system in 2004 and as discussed in the review of literature found in chapter two of this study, other possible reasons for the phenomenon include variance in identification practices, the influence of accountability systems, and the impact of state funding formulas.

While state and federal policy influence these trends, local decisions at the individual student level ultimately drive these changes over time. Prior research on external variables which interplay to influence decisions at the local level surrounding special education enrollment rates has primarily focused on analysis of variance in special education identification practices (Cullen Pullen, 2016; Reschly & Hosp, 2004; Scull & Winkler, 2011); high-stakes systems of accountability (Chakrabarti, 2013; Cullen & Reback, 2006; Figlio, 2006); and funding incentives (Cullen, 2003; Dhuey & Lipscomb, 2013; Greene & Forrester, 2002; Kwak, 2010; Mahitivanichcha & Parrish, 2005).

Several recent studies examined and confirmed the impact of PBMAS on declining special education enrollment rates in Texas, which resulted in underidentification of students and findings of noncompliance with federal regulations (Ballis & Heath, 2020; DeMatthews & Knight, 2019). However, no study has yet expanded upon these findings by exploring perspectives of those individuals having firsthand knowledge of district-level decisions that led to these statewide reductions in enrollment. The following research questions will guide this study:

1. How did the implementation of special education enrollment targets in the Performance Based Monitoring and Analysis System influence school administrators' decisions regarding special education identification in Texas?
2. What do school administrators perceive regarding other factors that may have influenced the decline in special education enrollment rates?
3. Since the findings of noncompliance with federal law and implementation of a statewide corrective action plan, how have special education enrollment practices and trends changed and what are the implications affecting local school districts?

Purpose of the Study

The purpose of this study was to investigate factors contributing to changing special education enrollment trends in Texas that began in 1999-2000 by examining fluctuating identification rates at state and local levels and gaining perspective from school personnel with direct knowledge of special education enrollment practices and the impact of federal and state policies. The study explored possible causal factors through a descriptive analysis of the data and deepening of understanding by interviewing key school personnel with direct knowledge of identification practices in districts during the specified timeframe.

While assumptions about these changing rates point to the implementation of PBMAS, the problem is complex and holds vast implications for the thousands of students who did not receive appropriate educational services as a result. By closely examining district level data and soliciting input from those directly observing these changes at the time, my hope was to gain a deeper understanding of why this phenomenon occurred and what future implications are resulting from changes in policies and practices at state and local levels.

Significance of the Study

In January 2018, the United States Department of Education found that the state of Texas failed to comply with federal laws requiring schools to evaluate, identify, and provide special education services to all eligible students in accordance with federal regulations (United States Department of Education, 2018). These conclusions, coupled with a substantial reduction in special education enrollment beginning in the early 2000s, support claims that thousands of students across the state have not received special education services in accordance with state and federal laws. Corrective actions were established by the TEA in response to these findings of noncompliance require districts to engage in outreach efforts, which will likely strain existing staff and resources available to meet the expanding needs.

Although these issues with legal compliance are problematic from a policy implementation perspective, a broader issue lies within the moral and ethical obligation of educators and school administrators to appropriately serve students based upon their individualized needs. When the implementation of policy conflicts with the purpose and core value of educating all students, the results go well beyond implementation of corrective action plans at the state, local or federal level. The impact of failing to provide a Free and Appropriate Public Education (FAPE) to thousands of entitled students across a period of approximately two

decades will likely be felt across the lifetime of the children impacted by this apparent act of underidentification across the state of Texas.

Although much research exists surrounding variables which incentivize or disincentivize special education identification, no study has yet investigated these specific enrollment rate changes or key school personnel's perceptions regarding why these changes occurred. These changing trends are complex, and by examining both the trends and perceptions of individuals closely involved, a depth and breadth of understanding can be achieved beyond the scope of prior research.

As the state of Texas moves forward in the wake of these events, it is important for policymakers and educators to fully understand why underidentification occurred and develop a plan to effectively meet both current and future needs of students with disabilities in Texas. Understanding why this phenomenon occurred in Texas is a crucial step in ensuring that corrective actions result in improved outcomes for students and preventing future underidentification of eligible students.

The theory of institutional choice as a framework for evaluating educational policy offers the benefits of predicting and clarifying issues in educational policy and suggesting significant issues for future research (Clune, 1987). Gormley (1987) describes institutional policy analysis as the study of government reform and its consequences. This approach to analyzing policy focuses on procedural choices, the redefinition of relationships within government, or decisions that affect the influence of outsiders on government itself. Differing from other traditional approaches to policy analysis which examine components of the political process to enhance understanding, this methodology seeks to understand the substantive consequences of institutional change. Using the lens of institutional choice, this study seeks to better understand

the consequences of policies impacting enrollment declines and provide recommendations for further consideration.

Constructed as a case study, multiple sources of data were analyzed, with an emphasis on interviews and demographic data of school districts to better understand the perceptions of school administrators and the impact of federal and state policies on special education identification rates. Based on a case study, where I analyzed multiple sources of data including publicly available sources and semi-structured interviews with key school personnel knowledgeable about special education identification practices within identified districts. Using a multiple case study design, I investigated school administrators' perceptions regarding factors that may have influenced changing rates of special education identification in Texas over the past two decades. My main takeaways are that while the implementation of the Performance Based Monitoring and Analysis System (PBMAS) indicator monitoring overall identification rates did result in a decline in special education enrollment, there were other factors that likely contributed to this phenomenon. These other factors include changes with referral, evaluation, and identification practices; the impact of accountability systems; and the influence of variance across practitioners. Over the past five years, the number of students eligible for special education across the state has grown significantly, and districts are now facing substantial difficulties in meeting the needs of this growing population.

In the next chapter, I review existing literature on factors that can influence rates of special education enrollment including variance in special education identification practices, high-stakes systems of accountability, and funding incentives. Then, chapter three contains a comprehensive description of the methodology used for this case study, including a detailed description of the population and participant selection process. In chapter four, results are

described through thematic analysis of the interview data. Finally, this Record of Study concludes with a discussion of my findings and implications for future research in chapter five.

CHAPTER II

REVIEW OF LITERATURE

Over the past four decades, researchers have examined a variety of factors believed to influence special education enrollment rates. Three of the most common variables found to influence enrollment rates in special education include the variance in identification practices, impact of high-stakes accountability systems, and influence of state funding formulas for special education. This review of research will focus on these three areas to establish an understanding of the existing literature and develop a foundation for exploring influences which have contributed to changing special education enrollment rates in Texas.

Variance in Identification Practices

Several researchers have considered the influence of identification practices upon overall identification rates (Cullen Pullen, 2016; Reschly & Hosp, 2004; Scull & Winkler, 2011). Since 1975, states are required by federal law to report enrollment data for twelve disability condition categories in which a student may qualify for special education. These categories include autism, deaf-blindness, emotional disturbances, hearing impairments, intellectual disabilities (formerly mental retardation), multiple disabilities, orthopedic impairments, other health impairments, specific learning disabilities, speech or language impairments, traumatic brain injuries, and visual impairments.

Developmental delay is an additional type of disability recognized by IDEA; however, the utilization of this category is optional. While overall rates of identification show a downward trend at state and national levels since the early 2000s, changing rates within certain disability types can help explain overall trends in enrollment (Scull & Winkler, 2011). Identification practices in Texas include disability definitions which differ from many states. Two areas where

these differences are most striking include the categories of developmental delay and specific learning disabilities.

The IDEA (2004) defines the special education eligibility category of developmental delay as children aged three through nine experiencing developmental delays in one or more of the following areas: physical development, cognitive development, communication development, social or emotional development, or adaptive development; and who needs special education and related services. The state of Texas has not elected to adopt the use of developmental delay. Texas instead uses the categorization of noncategorical early childhood for children between the ages of three and five years who are evaluated as having an intellectual disability, an emotional disturbance, a specific learning disability, or autism (Texas Administrative Code, §89.1040). The use of noncategorical early childhood as compared to developmental delay for the identification of eligibility in young children is more restrictive in both the applicable age range and eligibility criteria.

The criteria by which learning disabilities are identified include a contentious history with variance from state to state, and the decline in the prevalence of specific learning disabilities across the United States has impacted the overall rates of identification (Cullen Pullen, 2016). In Texas, the definition of learning disabilities is more restrictive than the federal definition because it does not specifically include dyslexia. The more exclusionary categorization of students with dyslexia in Texas may be a contributing factor to overall lower rates of identification under IDEA (Scull & Winkler, 2011).

In 1975, specific learning disabilities were first recognized as a category for identification and provision of special education services. While there were only 1.8 percent of total enrolled students across the United States who were reported within the category in the first year reported,

the rate increased in the years that followed and peaked at 6.1 percent during the 2000-2001 school year. A steady decline occurred over the next fifteen years, until 4.5 percent of all enrolled children were identified with specific learning disabilities in the 2014-2015 year. When considering the population of students eligible for special education, those with learning disabilities comprised 45.4 percent at the peak in 2000-2001 and declined to 34.8 percent during the 2014-2015 school year (National Center for Education Statistics).

In 1977, the U.S. Department of Education first proposed regulations to assist states in identifying students with learning disabilities. This early methodology, where evaluators identified a “severe discrepancy” by comparing a student’s achievement and intellectual ability as measured by standardized test performance, was based upon research where children demonstrated learning difficulties which were not commensurate with their general intelligence (Rutter & Yule, 1975). The discrepancy model prevailed for over two decades following its implementation, despite opposition from scholars calling for earlier academic intervention and abandonment of the “wait-to-fail” model due to the length of time a student must struggle before their achievement scores fall significantly below their intellectual ability (Fuchs, Mock, Morgan, & Young, 2003).

In the early 2002, the President’s Commission on Excellence in Special Education recommended using an alternative approach to diagnosing specific learning disabilities. This new method, based upon a child’s academic performance before and after implementation of research-based interventions, was endorsed as way to identify students in need of the more intensive supports which could be provided through special education (Fuchs, Mock, Morgan, & Young, 2003). The reauthorization of IDEA in 2004 provided states the option to adopt criteria for specific learning disability identification which included consideration of a child’s response

to intervention, commonly referred to as RTI, and later known as a multi-tiered system of supports (MTSS).

The RTI method of identifying specific learning disabilities was different to prior methodologies where students' academic achievement and cognitive processing performance on standardized measures were considered. Not only was RTI an alternative for the identification of specific learning disabilities, but it also emphasized the importance of early intervention and quality instructional practices prior to referral for special education services. Fuchs, Fuchs, and Stecker (2010) explored two perspectives on RTI and described one as the "IDEA group", who view the purpose of RTI to promote early intervention and better methods to identify disabilities. The other "NCLB group" view RTI to close the achievement gap and reduce the prevalence of high incidence disabilities, such as specific learning disabilities.

Adoption of the RTI approach to identification of specific learning disabilities varies by states, with some states adopting a model, others developing policies and guidelines, and others only providing guidance (Berkely, 2009). In addition to the discrepancy model where students' cognitive function and academic achievement is assessed, the Texas Administrative Code states that students may meet criteria for a specific learning disability if they do not make sufficient progress when provided a process based on the student's response to evidence-based intervention. At this time, Texas has not adopted any formal model for implementation of a RTI system. In a 2004 study, Reschley & Hosp examined states' practices in identification of SLDs using a survey administered to state education agencies. They found that variability in practices with RTI across states is a criticism of the model and may also contribute to variance among states and national rates.

A substantial body of research exists regarding disproportionality of representation within special education surrounding the over and underidentification of specific groups based upon gender or ethnicity. Oswald (2003) examined rates of identification based upon gender and found inequity to be a factor influencing significantly higher rates of identification among boys. In an early article addressing special education identification practices, Dunn (1968) expressed concerns that surrounded the labeling of large groups of students from ethnically and/or economically disadvantaged backgrounds into homogenous groups and tracks. Concurring with these findings, a later study explained that minorities, males, and “educational misfits” who did not fit easily into the educational system were placed into special education (Noel & Fuller, 1985).

Other research has focused on over and underidentification of culturally and linguistically diverse student groups and asserted that disproportionate identification rates result from cultural, linguistic, and racial bias, as well as inequity within the educational system, and overrepresentation of African American students in special education has been an area of frequent study and scrutiny. (Coutinho & Oswald, 2000; Skiba et al., 2008). More recently, some researchers have challenged the notion of disproportionality and found when controlling for factors such as academic achievement and behavioral functioning, minority children are underidentified for special education (Fish, 2019; Morgan, Farkas, Hillemeier, Mattison, Maczuga, Li, & Cook, 2015).

Texas has seen a growing Hispanic student population over the past several decades, which is a student group who is often under-represented in special education (Scull & Winkler, 2011). According to the TEA student enrollment data during the 2015-2016 school year, 52.2 percent of students enrolled in public schools in Texas were Hispanic. This is an increase in the

percentage from ten years prior when only 45.3 percent of students in Texas were Hispanic. Researchers have found that Hispanic students often attend lower performing schools; therefore, these students are less likely to be placed into special education (Hibel, Farkas, & Morgan, 2010). Rising rates of a historically underrepresented population might also contribute to lower rates of identification for special education in Texas.

School Accountability Systems

Accountability systems are another variable believed by scholars to influence enrollment in special education programs (Chakrabarti, 2013; Cullen & Reback, 2006; Figlio, 2006). Prior research has examined federal and state accountability systems' impact upon changing special education enrollment rates and how the application of these systems may incentivize schools to identify students to access exemptions, modifications, or accommodations to testing requirements.

At the federal level, the No Child Left Behind Act of 2001 (NCLB) enhanced schools' accountability for improving academic performance and closing achievement gaps for historically underperforming groups, including students with disabilities. With the passage of NCLB, students with disabilities were expected to achieve proficiency and progress on annual measurable objectives as part of schools' annual yearly progress (AYP) objectives. Schools who do not meet AYP are identified as needing improvement, and failure to improve performance can result in corrective actions or even school restructuring.

As part of this federal accountability system, states set a minimum student count for each student group and range from as low as five in Maryland to as high as 100 in California (Harr-Robins, 2015). The number of students in a student group must meet or exceed the minimum size requirements to be included in accountability calculations for the school or district's overall

performance of the specific student group. As a result, when schools do not have the minimum size enrolled for a student group, they are not held accountable for that student group. In a report for the U.S. Department of Education, Harr-Robins (2015) examined schools held accountable for students with disabilities compared to schools that were never held accountable for performance of students with disabilities due to minimum size requirements. This system is not unlike the PBMAS in Texas, where districts must meet minimum size requirements to receive a rating on numerous indicators.

With the passage of NCLB in 2001 and subsequent inclusion of students with disabilities as a student group, the exclusion of students with disabilities from accountability systems was no longer an option for schools and districts. Increased high stakes testing and accountability requirements have caused some researchers to question the impact of accountability systems on special education enrollment. Cullen and Reback (2006) examined the Texas accountability system in the mid-1990s and determined that schools classified increasing numbers of students as special needs as a response to incentives with exemption rates. In another study, Chakrabarti (2013) examined Florida's high-stakes accountability system where the performance of students with disabilities was not included and found schools to respond to the incentive of exclusion by increasing enrollment into excluded categories to "game the system" and avoid consequences related to underperformance on the state accountability system. These findings are consistent with prior studies linking the classification of low-performing students into excluded categories to improve schools' performance on high-stakes accountability systems (Cullen & Reback, 2006; Figlio, 2006).

Over the past several decades, the state of Texas has undergone changes in assessment and accountability, especially as it relates to practices for students with disabilities.

Accountability at the school level in Texas began in 1993 based upon student performance on the Texas Assessment of Academic Skills (TAAS), a criterion-referenced testing program implemented in 1990. At that time, students with disabilities could be exempted from assessment if it were determined that their disability was severe enough to limit usefulness of testing. Alongside the passage of NCLB 2001, the TEA introduced a new assessment to improve accessibility and include eligible students with disabilities called the State-Developed Alternative Assessment (SDAA). This assessment allowed students' ARD committees to select the instructional level at which the student would be tested, as an alternative to the Texas Assessment of Academic Skills (TAAS). In 2003, Texas replaced the TAAS with the Texas Assessment of Knowledge and Skills (TAKS), and eligible students with disabilities continued to have the SDAA available as an alternative assessment until its discontinuation in 2007, when the TAKS-Inclusive (TAKS-I) assessment was introduced an assessment for students with disabilities who, even with allowable accommodations, TAKS was not an appropriate measure of academic progress.

In addition to the TAKS-I option, the TAKS-Alternate was also implemented in 2006, providing an alternative assessment for students with significant cognitive disabilities. The TAKS-Accommodated later replaced the TAKS-I assessment in 2008 as an available assessment for students with disabilities based on the same grade-level achievement standards as the TAKS test, and the TAKS-Modified assessment was offered in this same year as a version based upon modified achievement standards for students who met participation requirements. The TAKS system was replaced with the current testing program, the State of Texas Assessment for Academic Readiness (STAAR) in 2012, and STAAR-Modified and STAAR-Alternate were options for eligible students with disabilities. The modified version of STAAR was discontinued

after spring 2013 in response to federal requirements for students with disabilities to be assessed using grade-level standards, with only the most severely disabled students receiving an alternative version of the state assessment.

In addition to accountability systems designed and implemented at state and federal levels to improve student performance, other systems such as the PBMAS have been implemented to gain program compliance with federal regulations. As described in the initial 2004-2005 PBMAS manual, this system was designed in response to House Bill 3459 and came on the heels of a reorganization of the TEA that occurred in 2003. This data-driven analysis system focused on student performance and program effectiveness in four areas: Bilingual Education/English as a Second Language, Career and Technology, No Child Left Behind, and Special Education. Each of these areas included performance indicators and a district's stage of intervention was determined by their cumulative performance in each area.

Fifteen special education indicators were included in the first iteration of this system, with the first being overall special education identification rates. It was within this system that Texas implemented an indicator to monitor districts' percentage of students receiving special education. Districts would achieve a performance level of "met standard" if they identified 8.5 percent or fewer students to receive special education. Performance levels increased incrementally with greater rates of special education enrollment, with the highest performance level of three indicating that more than 16.1 percent of students received special education services (PBMAS Manual, 2004-2005).

Funding Systems

Other researchers have examined the influence of state-adopted funding systems for special education on interpretation and implementation of identification practices at the state and

local level (Cullen, 2003; Dhuey & Lipscomb, 2013; Greene & Forrester, 2002; Kwak, 2010; Mahitivanichcha & Parrish, 2005; Parrish & Chambers, 1996; Noel & Fuller, 1985). Although the intended benefits of special education are many, placement and provision of services results in substantial financial obligation. While fiscal allocations to educating students with disabilities increased, concern over the impact of reducing resources to general education began to grow across the nation (Cullen, 2003; Greene & Forrester, 2002; Noel & Fuller, 1985).

Initial studies considering the impact of state characteristics on federal policy implementation found that when states and local districts allocated more resources to education for all students, fewer students with disabilities were identified (Noel & Fuller, 1985). In the early 1990s, researchers began to consider variation among characteristics of special education program demographics at the state level and examined the positive impact of state wealth on enrollment rates for specific categories of students with disabilities (McLaughlin & Owings, 1992).

The fiscal impact of increasing special education program enrollment garnered increased attention following accounts highlighting the impact of special education programming on resources. One public report described the significant financial obligations of special education services and intrastate variations of eligibility categories as reasons for reform (Shapiro & Loeb, 1993). In the years that followed, researchers considered various state funding methodologies and formulas and their impact upon student enrollment and placement in special education. Cullen (2003) found that from 1992 to 1997, fiscal incentives could explain nearly 40 percent of the growth in disability rates in Texas.

In the mid-1990s, reports described the increasing economic burden on states and local districts for educating the growing numbers of students with disabilities. Parrish and Chambers

(1996) found that only eight percent of special education funding came from the federal government and explored the implications of reforming special education finance using a results-based accountability system. Approximately twenty years after legislation was enacted to protect the rights of students with disabilities, questions began to arise surrounding the resulting strain on resources from general funds and implications for the future of special education (Dorn, Fuchs, & Fuchs, 1996).

As special education enrollment continued to rise in the early 2000s, funding required to provide these services grew exponentially. In a report for the United States Department of Education, Office of Special Education Programs (OSEP), the Special Education Expenditure Project (SEEP) found that from 1977-78 to 1999-2000, the percentage of special education students identified grew from 8.5 to 13 percent, and total spending on these services increased from 16.6 percent to 21.4 percent out of \$360.6 billion total spending on elementary and secondary education in the United States (Chambers, Parrish, & Harr, 2002). The SEEP report further explained that the additional average cost of educating students with disabilities increased significantly since 1968-1969. Special education spending across the U.S. in 1999-2000 was estimated to be \$50 billion, or \$5,918 per pupil, above the cost of educating non-disabled students.

With only 10.2 percent of total special education expenditures subsidized by federal IDEA funds in 1999-2000, the substantial surge in funds allocated from state and local governments to special education resulted in researchers further examining how states' funding systems might incentivize schools to identify students for special education. Scholars considered these various systems and provided recommendations for states to implement funding systems

with consideration to the rising cost of special education services (Greene & Forrester, 2002; Cullen, 2003).

In an Interim Report to the 79th Texas Legislature (2004), it was noted that Texas had the second largest total number of students receiving special education services, and in 1998-1999 the state fiscal appropriations to special education were approximately \$1.5 billion, or \$3,109 per student. This report explained that Texas currently used a weighted pupil system and referenced a 2002 report from the U.S. Department of Education's Special Education Expenditure Project, which warned that such a system could incentivize schools to classify students inappropriately due to the fiscal incentive created by weighted funding (Chambers, Parrish, & Harr, 2002). The first recommendation in the Interim Report to the 79th Texas Legislature stated that they [legislators] should "determine what aspects of our current funding mechanism for special education encourage overidentification; and then investigate alternative methods for funding special education that decrease any incentives to overidentify students as needing special education services" (p. 52), clearly setting the stage for a discussion surrounding rates of special education identification in the state.

Prior studies have examined the impact of bounty versus capitation systems for funding special education at the state level. Bounty systems provide additional funds based upon student needs, while capitation systems provide a fixed amount per enrolled student. In 1993, Dempsey and Fuchs conducted a longitudinal study following implementation of a weighted funding system for special education in Tennessee and observed that students were placed in more restrictive settings at a higher rate following the application of higher funding weights. Although special education directors' survey results in this study indicated that 80 percent perceived these changes in placement to more restrictive settings as due to the changing student needs in their

own districts, only 60 percent believed that other districts' changes were due to the needs of services. As a result, the researchers concluded that local decisions regarding placement of students may be influenced by the more financially rewarding option.

In a Civic Report on the Effects of Funding Incentives on Special Education Enrollment, Greene and Forster (2002) examined funding systems across the United States and determined that states who implemented a "bounty" system of funding created financial incentives to place students in special education. As a result, "bounty" system states experienced greater enrollment growth and spending for special education than states who employed a "lump-sum" system of funding. Furthermore, concluded that the U.S. should curb "out-of-control special education programs" and save over \$1.5 billion annually by implementing the following recommendations: establishing lump-sum financial systems, providing vouchers for students with disabilities to attend private schools or receive services from private providers, auditing special education placements to ameliorate inappropriate identification, and redirecting IDEA funds to only support objective categories of identification.

Cullen (2003) conducted a study on the impact of state reimbursement on rates of identification in Texas and indicated that local decisions have an impact on the overall size of special education programs. This study determined that the funding formula in Texas attributed to nearly 40 percent of program growth from 1992 to 1997. In another state analysis, Kwak (2010) considered how changes in the California finance formula from weighted based upon the number of students with disabilities to a census system based upon total enrollment impacted special education enrollment. Findings indicated that local schools were influenced by the increasing costs associated with special education and as a result decreased the percentage of

students identified as disabled, especially within categories that more subjective such as learning disabilities and attention-deficit disorders.

Mahitivanichcha & Parrish (2005) explored various funding formulas for special education and their impact on special education identification. They explained that all funding systems have the potential for impacting local practices and described systems where state aid was allocated using weighted formulas, reimbursement for expenditures, or allocation of resources for prescribed ratios. As a result, policymakers should carefully consider funding practices and select those that promote best special education practice.

States who distribute funding for special education programs based on a fixed amount per enrolled student use a methodology referred to as census funding, or capitation. Implementation of a capitation system in California resulted in decreased enrollment in special education (Kwak, 2010). Dhuey and Lipscomb (2011) expanded upon earlier work related to capitation systems by considering changes in nine states following adoption of capitation systems from 1991 to 2003. Analysis of trends in this study found that rates of identification tended to decline after implementation of capitation systems, especially in disability categories considered subjective, as well as in earlier or later grades. They also concluded that decreased state and rising local funding are also associated with capitation systems.

Researchers have found that bounty systems encourage higher rates of identification, while capitation systems result in special education enrollment declines (Cullen, 2003; Dempsey & Fuchs, 1993; Dhuey & Lipscomb, 2011; Greene & Forster, 2002; Kwak, 2010). While a large body of research exists examining the impact of funding on various state systems and identification rates, the question remains whether the Texas funding mechanism or other

variables influenced the rise and fall of special education enrollment rates over the past three decades.

As the review of literature reveals, variables influencing special education enrollment rates have been explored extensively. The influence of policies including variance in special education identification practices (Cullen Pullen, 2016; Reschly & Hosp, 2004; Scull & Winkler, 2011); high-stakes systems of accountability (Chakrabarti, 2013; Cullen & Reback, 2006; Figlio, 2006); and state funding incentives (Cullen, 2003; Dhuey & Lipscomb, 2013; Greene & Forrester, 2002; Kwak, 2010; Mahitivanichcha & Parrish, 2005) have been investigated and each found to influence rates of enrollment. One recent study examined the impact of the PBMAS on declining special education enrollment rates in Texas, which resulted in underidentification of students and findings of noncompliance with federal regulations (Ballis & Heath, 2020; DeMatthews & Knight, 2019). However, no study has yet expanded upon these findings by including interviews with those individuals having firsthand knowledge of district-level decisions that led to these statewide reductions in enrollment.

CHAPTER III

METHODS

The purpose of this study was to investigate factors contributing to changing special education enrollment trends in Texas that began in the 1999-2000 school year by examining fluctuating identification rates at state and local levels and gaining perspective from school personnel with direct knowledge of special education enrollment practices and the impact of federal and state policies. This chapter provides an explanation of methods used to examine the research questions, as well as an explanation of the research design, processes, and rationale. The subsequent discussion includes descriptions of data sources, data collection, data management, and analysis of data.

A case study design was employed for this research, where I conducted qualitative interviews and descriptive analysis of state and district demographic data. I conducted semi-structured, open-ended interviews with four participants from four different school districts. Factors related to evaluation and identification practices, the influence of accountability systems, and school funding were considered; however, the design of the study allowed for additional themes to emerge.

Methodology

A multi-case study design was selected as the framework for this research to obtain insight around variables and practices that influenced declining special education enrollment rates in Texas. This approach was chosen because a more in-depth understanding regarding the perceptions of personnel directly knowledgeable of school and district practices is needed to better understand the factors influencing the change at a local level. The methods selected for

this study are further supported in the field of education because it provides information about the unique dimensions of a case and offers more generalized applicability (Hays & Singh, 2012).

Because the focus of this study is to generate a greater understanding of beliefs and practices that shaped changes in practice in response to policy, employing the use of a case study to explore the data over time will provide insight into the collective memories within the context of time and place (Plummer, 2001). Yin (2014) further supports the selection of a case study methodology to study a real-life, contemporary context or setting. The selection of a case study approach was ideal for the design of this study, as it facilitated exploration of knowledgeable individuals' perceptions and beliefs.

The first phase of research was a descriptive analysis of student enrollment data reported by school districts annually through the Public Education Information Management System (PEIMS). This process informed participant selection, as special education enrollment rates from the PEIMS annual snapshot data were analyzed using selected years for all public-school districts in Texas. Datasets for this analysis were selected based upon the school years in which high (1999-2000) and low (2013-2014) statewide enrollment rates were reported.

A descriptive analysis of district data, including special education enrollment rate changes between the two school years was conducted to help assist in the selection of participants. The iterative process of descriptive analysis as described by Loeb et. al (2017), was followed to support organization of the data and detection of any meaningful patterns that emerged. The observed overall decline of state rates in special education and consideration of variables influencing these trends assisted in identification of the constructs that best represent the most salient features of the phenomenon. As established by DeMatthews and Knight (2019), districts with the highest special education enrollment rates prior to the implementation of the

Performance Based Monitoring and Analysis System (PBMAS) saw the greatest reduction after PBMAS. The results of descriptive analysis of prior data, and consideration of the strongest predictor of declining enrollment rates, informed the selection of participants and development of interview questions (Creswell & Creswell, 2018).

Participants participated in semi-structured interviews based upon the identification of districts in the first phase, as well as the availability of key individuals within the districts who have knowledge of local practices surrounding identification of students for special education during the specified timeframe. The process of participant selection is described in detail within the sampled districts section of this chapter. Qualitative data was collected from participants through a semi-structured interview procedure, and subsequent member-checking procedures were used to improve accuracy and intent of the interview data (Lincoln & Guba, 1985).

Data Sources

Publicly available documents were an important data source in this study, as they provide context around current and historical changes (Yin, 2018). The primary source of data used in the participant selection phase of this study included Texas school districts' student enrollment information available as part of the publicly available PEIMS Snapshot: School District Profiles, or "snapshot." According to the Texas Education Agency (TEA), snapshot is a TEA product that provides general information about the characteristics of public education in Texas, at both the state and district levels. The annual PEIMS fall snapshot data is reported by each public school district in the state based upon enrollment details on the last Friday of October during each school year and are publicly available for download.

Snapshot topics include a variety of demographic information about students and staff, as well as financial information about school district budgets, property values, and state financial

assistance (TEA, 2020). For descriptive purposes, other years' PEIMS snapshot data were also considered, including those in which significant policies were implemented, such as the reauthorization of Individuals with Disabilities Education Act (IDEA) and implementation of the PBMAS in 2004, as well as most recently available PEIMS snapshot data to provide context around more recent trends.

The study relied upon data gained through publicly available sources and semi-structured interviews with key school personnel knowledgeable about special education identification practices within identified districts. Due to the longitudinal nature of changing special education rates in Texas, it was important that participants had direct field experience during the specified timeframe. These key personnel included campus and district administrators with direct knowledge of practices at the local level.

To gain a comprehensive understanding of the background and context of the study, other data reviewed were PBMAS manuals and annual reports published by TEA, relevant federal and state policies including those related to special education identification practices and funding systems, the TEA Special Education Strategic Plan (2018), and publicly available communicate between state and federal entities regarding special education enrollment rates and investigatory findings in Texas.

Population and Categories

The population for this study included 1,025 public school districts in Texas, with the exclusion of charter schools due to their selective enrollment practices. As established by DeMatthews and Knight (2019), the greatest predictor of enrollment decline during this timeframe was a district's rate of students identified as eligible for special education services prior to the implementation of PBMAS. The key construct of districts' initial, or baseline, rate

during the 1999-2000 school year coupled with the magnitude of change over the specified timeframe was used to inform the grouping of districts for participant interview selection.

Special education enrollment rates in the statewide population of 1,025 districts ranged from zero to 42 percent during the 1999-2000 baseline school year and zero to 29 percent in the 2013-2014 school year. Total district enrollment within the population of 1,025 districts ranged from 13 to 210,716 students in the 2013-2014 school year. During this time, a statewide decline in special education enrollment from 12 percent to eight percent was observed. Meanwhile, the total population of students enrolled in Texas public schools grew from four million to five million, an increase of over 28 percent during the period examined.

Other notable statewide changes in demographics during this time included an increase in the percentage of Hispanic students (40 to 52 percent), a decline in the proportion of White students (43 to 29 percent), and an increase in the percent of students classified as Economically Disadvantaged (49 to 60 percent). The percentage of students who are African American remained relatively stable (14 to 13 percent); however, other student demographic changes are more difficult to evaluate due to changes in reporting of race/ethnicity from “Other” to more specific categorizations during this time.

To gain a wide variety of perspectives and experiences from interview participants, 1,025 Texas public school districts were divided into four groups from which to select individuals for an interview. These four groups were created by first identifying those with higher or lower baseline rates in special education enrollment during the 1999-2000 snapshot data set. These two initial groups were then divided based upon the magnitude of change in special education enrollment rates between the 1999-2000 and 2013-2014 school years.

During the initial division of groups, districts whose special education enrollment in the 1999-2000 snapshot year was 12 percent or less fell into one group and more than 12 percent in the second. This cut point was selected based upon performance level assignments within the 2004 PBMAS system and statewide average rate of 12 percent during the baseline year. The two initial groups were then divided again based upon the magnitude of change over the specified timeframe, with those demonstrating a decline of greater than or equal to five making up the third group and those with less than five forming the fourth and final group. The cut point of 5 percentage points was chosen for the second division of districts because those districts experienced a decline in rates greater than the statewide decline rate of four percentage points.

The intent of dividing districts into four groups using this methodology was to create a process whereby the selection of participants was more representative of the various changes experienced at the local level during this time. The 1999-2000 snapshot year report rounded all percentages to the nearest whole number; therefore, cutoffs for the baseline rate were established at 12 or 13 percent. During the 2013-2014 snapshot, data was reported with greater precision; therefore, change rates (percentage point decline) were reported at the tenth decimal place.

Table 1 Group Characteristics

Group	Baseline Percentage	Percentage Point Decline	Description	Number of Districts
Group A	≤ 12.0	≤ 4.9	Lower Baseline, Lower Decline	315
Group B	≥ 13.0	≤ 4.9	Higher Baseline, Lower Decline	191
Group C	≤ 12.0	≥ 5.0	Lower Baseline, Greater Decline	30
Group D	≥ 13.0	≥ 5.0	Higher Baseline, Greater Decline	489

Sample Selection Process

After identification of district groups based upon key constructs, a random selection process was used to identify one district from each of the four groups. Key personnel from these districts were invited to participate in the interview portion of the study. If any initial district from a group was non-responsive or unwilling to participate, then a subsequent random draw identified the next district to receive an invitation to participate in the qualitative portion of the study from that group.

This process was repeated until one participant was identified for participation from each of the four groups. This selection method was designed to promote participation by districts whose initial rate was both higher and lower, as well as those who experienced greater and smaller amounts of change. A district's willingness to participate and the accessibility of participants who met criteria related to the knowledge of identification practices also influenced the selection process. Seventeen districts were contacted in order to identify four participants with one from each of the four groups to participate in this study. The thirteen other districts who were contacted and did not participate in this study were either nonresponsive to the request, did not have a participant available who met the criteria, or chose not to participate due to time constraints.

Description of Sample

Group A included 315 districts, whose special education enrollment rates were twelve percent or less during the 1999-2000 school year. This lower baseline, lower decline group demonstrated less than five percent decline in special education enrollment during the specified timeframe. Of these 315 districts, 42 showed special education enrollment increases and three saw no change in enrollment percentage.

The district selected within Group A was most recently classified as Major Suburban by the TEA and as a Large Suburb by the National Center for Educational Statistics. During the timeframe examined from the 1999-2000 through the 2013-2014 school year, District A saw their special education enrollment rates decline slightly from 8 percent to 7 percentage points. Overall district enrollment rates were also stable during this time; although, they did experience a shift in demographics with growth of Hispanic students (7 percent to 23 percent) and decline in the proportion of students classified as White (87 to 59 percent). During this same time, District A saw expenditures for special education grow from 11 percent to 15 percent of the district's total operating expenditures.

Group B included 191 school districts whose special education enrollment rates were 13 percent or more during the 1999-2000 school year and who demonstrated less than five percent decline in special education enrollment during the specified timeframe. Of the 191 districts in this higher baseline, lower decline group, 11 experienced an increase in the percentage of special education students enrolled across the time examined.

The district selected within Group B was most recently classified by the TEA as an Other Central City and a Midsized City by the National Center for Educational Statistics. During the timeframe examined from the 1999-2000 through the 2013-2014 school year, District B experienced a decline in special education enrollment from 14 percent to 10 percent. Total district enrollment also declined during this time, with their overall student population declining by over 11 percent. District B also experienced a shift in district demographics during this time with a growing proportion of students who were Hispanic (46 to 59 percent) and decline in the rate of students who were White (47 to 34 percent). Although the special education enrollment

declined during this time, expenditures for this program in District B increased from 10 to 16 percent of the district's total operating expenditures.

Group C was the smallest group and included 30 school districts whose special education enrollment rates in the 1999-2000 school year were 12 percent or less and special education enrollment declines of five percent or more across the timeframe evaluated. Within this lower baseline, lower decline group, district special education enrollment rate declines ranged from 5 percent to less than 9 percent. Group C was both the smallest and most homogeneous of the four groups, with half of the districts in the group classified by the TEA as Rural and serving less than 1,000 students each.

The district selected within Group C was most recently classified by the TEA as Other Central City Suburban and a Distant Town by the National Center for Educational Statistics. During the timeframe examined from the 1999-2000 through the 2013-2014 school year, District C experienced a decline in special education enrollment from 12 percent to 7 percentage points. Total district enrollment also declined during this time, with the overall student population showing an almost 4 percent decrease. District C experienced a similar shift in district demographics during this time with a growing population of students who were Hispanic (26 to 47 percent) and decline in the proportion of students who were White (45 to 27 percent). Although the special education enrollment declined significantly during this time, special education expenditures increased from 11 to 14 percent of the district's total operating expenditures in District C.

Group D was the largest group of school districts and consisted of 489 districts whose special education enrollment was 13 percent or higher in the 1999-2000 school year and who yielded a decline in enrollment of five percent or greater over the specified period. Within this

higher baseline, greater decline group, the range of enrollment declines were between 5 and 32.2 percentage points.

The district selected within Group D was most recently classified by the TEA as Other Central City Suburban and a Rural-Fringe by the National Center for Educational Statistics. During the timeframe examined from the 1999-2000 through the 2013-2014 school year, District D experienced a decline in special education enrollment from 16 percent to 8 percentage points. Total district enrollment grew significantly during this same time, with the overall student population increasing by over 155 percent. District D also experienced changing district demographics during this time with a growing population of students who were Hispanic (29 to 33 percent) and decline in the proportion of students who were White (71 to 61 percent). Although special education enrollment declined significantly during this time, expenditures increased from 11 to 15 percent of the district's total operating expenditures.

Description of Participants

The case study participant from Group A currently serves as an Executive Director of Special Services in a large suburban school district, as classified by the National Center for Educational Statistics (NCES, 2019) based upon current population size and proximity to urbanized areas. She has served as executive director of special education in her current district for the past 6 years, and her prior experiences in other Texas school districts include special education director, compliance coordinator, and speech pathologist. Notably, these two other districts where she worked previously also fell within the Group A classification.

Group B's participant is an elementary school principal in a midsized city school district. With 14 years of experience in this same school district, she has served as principal of her current campus for the past five years, as well as assistant principal for three years, instructional

coach for four years and a general education teacher for two years. Although this participant is a general education administrator, her campus serves a large population of students with disabilities including seven specialized program classrooms, and 26.9 percent of students at the campus identified in the instructional program of special education.

The participant from Group C is a retired special education director from a small rural district classified as Town-Distant. Having retired in 2017, this participant was a special education director in the district for 17 years and holds prior experience as a speech therapist, diagnostician, and assessment supervisor. This participant's experience as a special education director was in a Shared Services Arrangement (SSA), where she was responsible for multiple districts and District C served as the fiscal agent.

This study's Group D participant is currently a special education director in a suburban district classified as Rural-Fringe by the National Center for Educational Statistics. While she has served in this role over the past four years, she holds a total of 29 years in education and has previously served as a director of special programs, assistant principal, general education teacher and special education teacher. While her past 14 years are in her current school district, she also holds prior experience in a neighboring school district that also fell within Group D.

Data Collection

Data gathering occurred in two phases, with collection of district enrollment data during the initial phase and gathering of artifacts and completion of interviews during the interview phase. During the interview phase of research, data was gathered through semi-structured interviews designed to explore key school personnel's perceptions surrounding practices that impacted special education enrollment trends. Other artifacts such as PBMAS manuals and

reports, communique between OSEP and TEA, and relevant policies provided context and were considered when developing interview questions.

Interview Techniques

Individual interviews are the most widely used qualitative data collection method for unexplored and underexplored social phenomena (Hayes & Singh, 2012). Individual interview questions were inspired by the research questions and designed to gain understanding of the participants' background and perceptions while informing the research questions.

Interviews were conducted through electronic videoconferencing technology due to the state and necessary health and safety precautions associated with the COVID-19 pandemic occurring at the time of research. Each interview was approximately one hour in length, and participants were asked to respond to open-ended questions designed to elicit information regarding their understanding and perception of special education identification practices in the district during the specified timeframe of declining enrollment. This semi-structured format provided the researcher with increased flexibility and a richer picture of a phenomenon under investigation (Hayes & Singh, 2012). Within this format, the informal conversational approach allowed for rewording of questions and opportunity to explore ideas that might arise during an individual interview.

The following questions were asked of each participant in the order listed below:

1. Describe your current role and past professional experiences.
2. How have these prior roles supported the special education referral and identification process?
3. Specifically, during the period between 1999 and 2014, what trends do you recall around the identification of students for special education services in your district?

4. What do you recall regarding the message or directives from the Texas Education Agency (TEA) at this time related to special education enrollment?
5. What do you recall regarding the message or directive from your district leadership at this time related to special education enrollment?
6. How did you and/or your district respond to these messages and/or directives?
7. Describe any prior internal consideration or discussions that you can recall around funding implications associated with higher rates of identification for students in special education.
8. As the high stakes nature of state and federal accountability systems grew in the 1990s, what do you recall regarding the implications of students being identified for special education and the impact on these accountability systems?
9. As the importance of the Response to Intervention (RTI – now MTSS) grew as a methodology to better meet the needs of students, how did this impact your district's practices overall, as well as in relation to special education referrals?
10. If you were able to influence special education identification practices between 1999-2014, what pressure – if any – did you feel to reduce special education enrollment numbers?
11. Did your district actively seek to reduce special education enrollment rates during this time, and if so – how?
12. Describe your understanding and involvement in the Performance Based Monitoring and Analysis (PBMAS) system during this time.
13. Was your district required to develop an improvement plan in response to PBMAS for Special Education and if so, why?

14. Tell me about your district's special education enrollment trends over the past five years.
15. Since the intense scrutiny surrounding special education in Texas began in 2016, how has this changed special education identification practices in your district?
16. In thinking about the topics we've discussed today and reflecting on the practices and beliefs you've experienced over time related to special education identification – how does this make you feel?
17. Is there anything else that you feel would be helpful for me to know regarding special education identification?

These interview questions provided a framework for participants to share their individual experiences with special education identification practices, and follow-up questions were unique to the response of each participant. In cases where a participant had previously responded to a question within the context of another response, they were given an opportunity to expand their reply if there was any additional information that they wished to share.

Field Notes

Consistent with Merriam's (1998) recommended process for managing data in a case study, field notes were taken during the interviews, and the researcher subsequently noted observations while transcribing the participant interviews. The audio and video recordings provided the data used within the study.

Data Analysis

Thematic analysis was an important component of the data analysis process throughout this study. This method was essential to the processing of both data gleaned from publicly available reports and documents, as well as those collected through the interview process for identifying, analyzing, organizing, describing, and reporting themes found within a data set

(Braun & Clarke, 2006). Thematic analysis was an appropriate approach to data analysis in this study, because it serves as a useful method for examining the perspectives of research participants, aiding the research in highlighting differences and similarities, and producing unexpected insights (King, 2004).

During the initial phase of participant selection, PEIMS snapshot data for districts were compared across identified years, and the difference in special education enrollment rates was calculated. Districts were first sorted based upon their baseline rate of special education enrollment and subsequently the percent of change over time was used to aide in forming four groups for participant selection. This analysis of district level data also provided information about the variance among individual districts relative to statewide trends observed and aided in the participant selection process for the interviews.

Following the interviews from each of the four groups, the researcher personally transcribed the digital recordings by manually transcribing the audio and video recordings into text. Pseudonyms were assigned to each participant and used throughout the process to protect the confidentiality of the participants and their associated school districts. This process of manual transcription promoted familiarity with the data and initial consideration of possible categories and themes.

When conducting a qualitative analysis of interviews, a systematic approach to coding data should include the evaluation of specific statements and subsequent categorization into themes representing the phenomenon of interest (Creswell, 2014). In this study, an iterative and reflective six-phase process as described by Braun and Clarke (2006) was used to generate a thematic analysis of the data.

This six-phase process began with the researcher becoming familiar with the data through prolonged engagement. Through the process of manual transcription and multiple readings over time, reflective thoughts were generated, and possible codes/themes were considered. In the second phase, initial codes were generated across all four interviews through identification of important sections of text and attaching of descriptive labels. This process of initial coding resulted in 27 codes, which were categorized into possible themes in the next phase of the process.

Once established, the themes were reviewed and refined in the fourth phase. This aspect of the process resulted in a reduction of data into a more manageable set of four significant themes, which led to the next phase. In the fifth phase, defining and naming the themes, consideration was given to how each theme connects to the overall story in relation to the data set, and names and descriptions were created to provide clear understanding of the theme. Following the complete establishment of themes, the sixth phase included a final analysis and write-up of the report with the intent of providing the reader an account of the data that is concise, coherent, and logical (Nowell, Norris, White, & Moules, 2017).

Reliability and Trustworthiness

The establishment of trustworthiness is a key element needed for researchers to convey that their findings are worthy of attention (Lincoln & Guba, 1985). Clarity around how a researcher analyzes their data and what assumptions informed their analysis is important in evaluating the trustworthiness of the research (Nowell et al., 2017). It is important to conduct qualitative research in a rigorous and methodical manner to yield meaningful and useful results (Attride-Stirling, 2001).

This process used to improve reliability with this research included triangulation of multiple sources of evidence through observations, interviews, documentation, and by examining consistency within these data (Patton, 1987). My analysis of interview data used a process of coding, whereby connections between data collection and the explanation of meaning were made (Charmaz, 2001). Member checking increases the accuracy and intent of interview data for credibility, which enhances trustworthiness (Lincoln & Guba, 1985). I sent participants the transcription of their interview and asked each to review the document for accuracy, make any needed corrections, and provide additional information where they felt their response was not clear.

Role of the Researcher

As the researcher, I am also a practicing school administrator at the district level responsible for providing oversight for my district's special education program. My prior professional experiences include the roles of special education teacher, educational diagnostician, and special education director. With direct experiences in the field during much of the timeframe examined, the topic of research is one of direct personal knowledge and understanding.

Summary

A qualitative approach using a multi-case study was selected to explore the perceptions of school administrators around variables thought to influence changing special education enrollment rates in Texas. Thematic analysis and interpretation of the interviews broaden understanding and explain the findings within the context of the research questions posed. Findings of the study are discussed in chapter four.

CHAPTER IV

FINDINGS

The following chapter presents my research findings based upon analysis of the data. With consideration of existing literature surrounding factors that influence special education identification rates, I hypothesized that participants would identify variance in identification practices, pressures of accountability systems, and funding incentive changes as reasons for declining rates of special education enrollment in Texas that began in the 1999-2000 school year.

Using a multiple case study design, I investigated school administrators' perceptions regarding factors that may have influenced changing rates of special education identification in Texas over the past two decades. My main takeaways are that while the implementation of the Performance Based Monitoring and Analysis System (PBMAS) indicator monitoring overall identification rates did result in a decline in special education enrollment, there were other factors that likely contributed to this phenomenon. These other factors include changes in referral, evaluation, and identification practices; the impact of accountability systems; and the influence of variance among practitioners. Additionally, the number of students eligible for special education across the state has grown significantly over the past five years, and districts are now facing substantial difficulties in meeting the needs of this growing student population.

This chapter is organized into three sections. In the first section, a summary of methodology includes the purpose of the study and development of themes. In the second section, an in-depth description of the results of the study are shared through an explanation of each theme, including a discussion of one area that did not emerge as a theme as hypothesized,

along with supporting evidence from the interviews. The final section provides a summary of the findings.

Summary of Methods

Following a participant selection process designed to identify individuals from districts across the state with unique experiences and perspectives, a total of four individuals participated in interviews conducted between September 2021 and January 2022. These participants shared their perceptions and experiences related to special education identification practices, directives or messages received from the Texas Education Agency (TEA) and their district as they related to pressures associated with systems of accountability, and their beliefs regarding the impact of funding for special education services.

The intent of this multi-case study was to identify and explain potential causal factors that influenced declining special education enrollment trends beginning in the 1999-2000 school year through interviews with individuals who had direct knowledge of practices at the local level. This research seeks to also explain how special education enrollment practices and trends have changed over the past five years following the publication of a series of Houston Chronicle reports that began in fall 2016, subsequent findings of non-compliance by the United States Department of Education, Office of Special Education Programs (OSEP), and TEA's implementation of a statewide corrective action plan in response to these findings.

Results

Based upon a review of literature identifying factors known to influence special education enrollment, I made assumptions that participants would identify variance in identification practices, pressures associated with systems of accountability, and funding incentives as reasons for changing special education enrollment rates. Through a thematic

analysis of the interview data, four themes emerged which helped answer the research questions. These themes are described in the following portion of this chapter and include areas that were both expected based upon the hypothesis, as well as unexpected due to the exploratory nature of the semi-structured interview design and approach. The description of results concludes with a discussion of funding incentives, which did not emerge as a theme in this research.

Referral, evaluation, and identification practices.

Over the past two decades, substantial changes have transpired with the referral, evaluation, and identification of students for special education services in Texas. Many of these shifts have occurred in response to federal legislation such as No Child Left Behind (NCLB, 2001) and the reauthorization of the Individuals with Disabilities Education Act (IDEA, 2004). As a result, a myriad of variance exists from state to state, district to district, and across practitioners regarding procedures related to the referral, evaluation, and identification of students for special education services. The Individuals with Disabilities Education Act (IDEA) provides federal requirements associated with the education of students with disabilities; however, states develop unique regulations in addition to federal policy, resulting in variance with implementation and eligibility rates across states (Scull & Winkler, 2011).

As described by interview participants, the theme of referral, evaluation, and identification that resulted in a decline in special education enrollment included four aspects: implementation of a more rigorous pre-referral process using the Response to Intervention (RTI) model, transformation of evaluation procedures when assessing for specific learning disabilities, changing scope of evaluations, and a broader interpretation of Child Find requirements under the IDEA by both district personnel and families.

Response to intervention.

Within the theme of referral, evaluation, and identification, the implementation of RTI as a standard practice to help meet the unique needs of students who are struggling in school emerged as one potential reason for declining rates of special education identification. When IDEA was reauthorized in 2004, evaluation criteria for identifying specific learning disabilities was expanded to include consideration of whether the child received appropriate instruction through “data-based documentation of repeated assessments of achievement at reasonable intervals, reflecting formal assessment of student progress during instruction” prior to the referral to special education (34 CFR §300.309 (b)). Participants shared how the RTI process subsequently became an important part of pre-referral activities, which may have led to a reduction in special education referrals.

Participant A recalled that in the early 2000s, in response to federal and state pressure, there was a significant push to implement RTI prior to referring a student to special education:

Some of them [school districts] made the steps so difficult and so long that it delayed a child being identified. I do think that was a factor in the decline of numbers. I did find benefit in not referring some of those kids [English learners, at-risk, low socioeconomic], because they simply had not had the opportunity to learn, or they were learning a separate language and when you gave them focused, targeted intervention, they did make progress and proved that they did not need to be referred. However, there were other kids that needed to be referred sooner, rather than forcing them through the system.

Participant B offered a similar recollection of the early implementation of RTI during this time prior to referring a student to special education:

I really feel like there was a really big push to make sure they had – in 2014 we called it Response to Intervention. There was really a more firm process in like the consistency with intervention before you went to putting a label on a child.

Participant C shared both her recollections on the implementation of RTI and thoughts on how the framework might improve the appropriateness of referrals and identification:

At first it was a great thing, because there was something else that the kids could do before they went through special ed. And we did a lot of training with our campuses to get them to understand what RTI really was.

Because before that it was nothing. It was -- a kid wasn't doing well in school, so let's refer them to special ed without any kind of intervention. So RTI for us in special ed looked like it was going to be a really good thing. Because it looked like the kids were going to get some help, and then if the interventions were not appropriate or the children were not making progress, then we could look at identifying to see if there was an underlying disability and not where they just hadn't been taught. I thought RTI was an interesting and a good process if it was done right.

Participant D shared her perspective on the implementation of RTI and how the process was a way to help with referrals at that time:

I think then it became a checklist to begin with. I think the RTI became a checklist. And almost I think we felt better about it, because now I'm actually checking off a list. Have we done this? Yes. Have we provided this? Yes. Have we done this? Then it was proof and evidence that I've done exactly what you've asked me to do, and so I think it became kind of... and I don't think it was necessarily how kids responded to intervention. I think it was a checklist to help with referrals.

All four participants shared recollections around the implementation of RTI, and three of four described some benefit to implementation of the process. The participant with the higher baseline rate and greater decline in enrollment (District D) held the most cynical view of RTI and did not share any benefits as expressed by the other three participants.

Evolving evaluation methods for specific learning disabilities.

In addition to the inception of the RTI model to ensure appropriate instruction prior to referrals, another aspect that emerged within the theme of referral, evaluation, and identification practices was changing evaluation methodology for specific learning disabilities. While not specifically asked in the series of questions, participants identified changing evaluation procedures for identifying specific learning disabilities as a possible reason for declining eligibility rates during the time of statewide decline.

New language in the 2004 reauthorization of IDEA specified that criteria adopted by the state “must not require the use of a severe discrepancy between intellectual ability and achievement for determining whether a child has a specific learning disability” (34 CFR, §300.307). Prior to the reauthorization of IDEA, the most common methodology used in Texas to determine the presence of a specific learning disability was the simple difference, or discrepancy, model. In this model, the evaluator would administer standardized assessments of intellectual ability and academic achievement, then determine the difference between the general intellectual quotient (IQ) and specific areas of academic achievement (i.e., oral expression, listening comprehension, written expression, basic reading, reading fluency, reading comprehension, mathematics calculation, or mathematics problem solving). If a significant discrepancy (16 points or greater) existed between the two, the presence of a learning disability in specific area(s) of academic achievement was indicated.

Along with the prohibition of the discrepancy model, the reauthorization of IDEA specified that one of the criteria associated with the finding of a specific learning disability was that “the child exhibits a pattern of strengths and weaknesses in performance, achievement, or both, relative to age, state-approved grade-level standards, or intellectual development, that is determined by the group to be relevant to the identification of a specific learning disability, using appropriate assessments” (34 CFR §300.309).

In Texas, the rate of students whose primary disability was a specific learning disability declined significantly during this time. According to publicly available data from the TEA, the number of students in Texas whose primary disability was a specific learning disability declined from 265,335 (55 percent of students receiving special education services) in 1999-2000 to 163,264 (37 percent) during the 20013-2014 school year.

Although participants were not specifically asked about the impact of the changing eligibility criteria for specific learning disabilities, this evolution in methodology emerged as participants shared their thoughts related to changing practices that influenced declining enrollment rates. The change in assessment procedures resulted in more thorough and comprehensive evaluation of students and required new learning for evaluators across the state due to the more complex nature of analysis, relative to the simple discrepancy method used previously. The evolution of evaluation procedures for specific learning disabilities emerged across all four interviews as an important aspect of the events surrounding local practices during the period of declining special education enrollment across the state.

Participant A recalled when the specific learning disability condition criteria changed from discrepancy model to the pattern of strengths and weaknesses as a significant period of change for evaluation staff:

I was very sympathetic to the Diags (diagnosticians) and their learning curve, because it was such a dramatic change going from the simple subtraction to truly understanding cross battery. I believe there were a lot of kids who are not identified as LD (learning disabled) that should have been. Back during that time period when we shifted from simple discrepancy to a pattern of strengths and weaknesses, I saw a huge decline in eligibility. Kids not qualifying.

Participant B compared current practices with the prior use of the discrepancy model and shared her thoughts around the impact of this change on students' eligibility:

I do feel like teachers have a better understanding now, because really that full FIE (Full Individual Evaluation) is such a powerful tool. Whether or not they qualify, it tells us exactly what type of learner they are – it tells you their strengths and their weaknesses.

I remember a lot of DNQs (Do Not Qualify) that I would tell you if we went back and retested them in today's time, I don't think we would have said they didn't qualify. I just think we [now] have more tools to look at if it's a true learning disability or not.

Although she did not share the sentiment of the prior to participants around the impact on declining rates of enrollment, Participant C reiterated the significance of this change in methodology for determining specific learning disabilities and how it impacted students' evaluations for special education:

I was glad when we changed, because I felt like the model we were using was too simplistic. And so I felt like by changing the model, we were able to get more data, and when we did identify we were able to pinpoint some things that we didn't necessarily do before.

Participant D recalled similar memories of the transition from a simple discrepancy process to more thorough evaluation procedures:

It was strictly numbers – it was a numbers game with if it's a 16-point discrepancy. now I think it is so much different. You're looking at so many things, which is why I think so many kids qualify, because we're looking at all areas. When you did it the other way and there was a discrepancy, and it was pretty clear cut and if you qualified you qualified. Now it's not like that that. It's really like this (wavy hand motion). It's not the black and white. We're dealing with some different things and you're looking at more things. I think we're looking at kids more thoroughly.

Three of four participants shared their thoughts about the impact of changing methods for specific learning disability evaluation on declining enrollment. While the fourth participant did not connect the increasing complexity to enrollment declines, it is possible that her professional experience as a teacher and administrator would yield much less direct involvement with this aspect due to her differing roles, responsibilities, and experiences.

Changing scope of evaluations.

The next area participants identified within the theme of referral, evaluation, and identification was a changing scope of evaluations. Although the series of interview questions did not directly query participants about the scope of special education evaluations, each shared recollections regarding their perceptions of this area while responding to general questions about the process of identifying students for special education. Participants described how the scope of evaluations differed during the time period of statewide declining rates, including evaluators' approach to evaluating in all areas of suspected disabilities, the use of certain disability

categories, and the state's approach to not typically including dyslexia in the definition of specific learning disability and special education eligibility.

Participant A described her experiences during the 2000s around initial referrals where students were being tested only in the area of speech, despite more significant concerns. Within this same topic of evaluation scope, she later discussed the use of certain categories of disability, Noncategorical Early Childhood (NCEC) and dyslexia, and their inconsistent application around the state. She shared:

We really shifted to what I feel is a disjointed process where everything went through speech first for the most part. So kids, yes were being placed, and they were being served. And she [the special education director] believed serving them beyond what their eligibility was. So, we literally had kids who were speech only in a LIFE skills classroom [special education program designed for students with severe cognitive and adaptive needs].

I noticed a trend in (prior district) that we were not using it [NCEC], and basically kids were ending up speech impaired only. And speech language pathologists were providing feedback that, oh my God, I don't know what to do with this kid, it's far more than I can handle, and X amount of speech therapy is not going to be sufficient for this kid to come to kindergarten.

The federal definition includes dyslexia, but our state didn't recognize dyslexia as a LD. Just simply with that understanding of language, and how language plays into reading and writing, and that natural developmental sequence. I feel like we missed a lot of kids, as we had them coded wrong.

Although less directly involved with evaluation procedures due to the nature of her role, Participant B also shared her thoughts regarding the changes she has noticed in evaluation scope:

I would say in the last 4 years, we are doing far more in-depth evaluations other than just specific learning disabilities.

Participant C also addressed scope of evaluations from the perspective of changing demographics and student needs. With a steadily increasing population of students who were learning English, the scope of evaluations grew to include bilingual evaluation procedures:

We had to change our way we were evaluating and some of the things we were doing, because we now had a quite large bilingual population that we didn't have before. So that made a difference, and it made it far more difficult as far as our evaluations.

Because then we had to secure the services of bilingual assessment people, interpreters, and that kind of thing that we didn't have before. So that changed a lot of things in our district.

Participant D shared her general thoughts about how the scope of evaluations has grown over the course of the past two decades:

I think that we have started looking at the kid much more as a whole than as a score.

But when you do that, and when you look at all that – you're going to find more.

You're going to find more. You're going to see more kids that have a need.

Across participants, changes in the scope of evaluation were identified as an important aspect within the theme of referral, evaluation, and identification. The districts' varied baseline rates and change in enrollment did not appear to influence participants' perspective related to the change in scope of evaluations.

Enhanced understanding of child find.

The final component identified within the theme of referral, evaluation, and identification practices is an enhanced understanding of child find obligations under the IDEA by district personnel and families. With the initial passage of Education for All Handicapped Children Act (Public Law 94-142), children with disabilities who had previously been denied school admittance or services based upon their disability were afforded the right to an appropriate education and efforts were made to locate and enroll these students. Current statute §300.111 of IDEA obligates states to engage in child find, whereby all children with disabilities residing in the state are identified, located, and evaluated and develop a practical method to determine which children are currently receiving needed special education and related services.

Over time, interpretation of the child find obligation has expanded to include not only students with more severe disabilities, but also those with milder disabilities such as specific learning disabilities or health impairments such as attention deficit hyperactivity disorder. Participants recounted memories of how the interpretation of child find has changed over time and shared their perspectives on how this has impacted rates of referral, evaluation, and identification.

Participant A described parent involvement in the process of child find, and how often they feel that their child meets criteria for a certain category of disability, especially in the area of autism:

I tend to find that it is autism. Which surprises me because that's a pretty serious identification in my opinion. But was almost like the designer label there for a while. we will have parents say, I think my child has autism – you need to do an eval (evaluation). And we're like, we've already done three of those [evaluations]. What do

you see that we're not seeing, or what are you experiencing in the home that we don't see at school?

When comparing practices during the 2000s to present day, Participant B explained that the process of referral has changed in recent history:

Our district's process was to really make sure we had a research-based intervention, maybe even more than one, that you've tried before you're going into a referral.

I think [now] we refer a lot more often. We have some firm systems and procedures and interventions in place; they're running like clockwork.

Participant C shared a perspective around the interpretation of child find that was likely shaped by the smaller nature of her district and close connections with the staff involved in the decision-making process:

We were not really large, so I was able to review and look at the referral process on each of the campuses, and also to try to make changes and make sure that it was tight.

And then with my staff, we would discuss different types of assessments.

Participant D recalled process of referring struggling students during the 2000s in her prior role as an assistant principal (AP):

When I was an AP, we were extremely strict; we were very strict about dyslexia too.

You had to make sure you've done every single thing before we do this [refer a student to special education].

Throughout the interviews, participants recalled beliefs and practices related to referral, evaluation, and identification that influenced the change in enrollment rates during the early 2000s. The implementation of RTI, changes in evaluation methodology for the identification of specific learning disabilities, widening of evaluation scope, and evolving application of Child

Find requirements were all variables that participants perceive to have influenced identification rates during this time.

Systems of accountability.

As hypothesized, systems of accountability and their influence on rates of identification for special education emerged as a central theme in this study. Within this theme, several topics within the theme of accountability arose in the data. In addition to the influence of PBMAS indicator rating performance based upon overall identification rates, participants recounted the impact of monitoring significant disproportionality within PBMAS, as well as the impact of the state accountability system, which is based heavily upon students' academic performance on state assessments.

PBMAS and overall identification rates.

The Houston Chronicle released a seven-part series of articles beginning in fall 2016 asserting that the state of Texas systematically denied special education services to tens of thousands of disabled children by using PBMAS to monitor districts' special education identification rates. The PBMAS system, first implemented in 2004, included an indicator to monitor the percentage of students receiving special education in a district. With a performance target of 8.5 percent or fewer students in special education, performance levels and possible sanctions increased incrementally as districts' rates increased beyond the established target.

Participants all agreed that the overall identification indicator within PBMAS influenced the thoughts and behaviors of practitioners, which subsequently affected identification rates. Specifically, participants recalled concern about corrective actions that districts would be placed under by TEA and examples of local thoughts and behaviors employed to diminish the number of referrals to special education.

Participant A recalled:

There was messaging from TEA that we needed to be careful about overidentifying kids. Districts had to wave a flag saying we have a problem here, and districts didn't want to do that. I think they [districts] were concerned about the corrective action that they would be put under with TEA. I think they were concerned about how their superintendent would feel about the special education department and the image it might give a district.

Participant B shared her recollection of the district's actions to comply with the PBMAS indicator related to overall identification rates:

I do specifically remember that whole 10 percent rule and monitoring that pretty closely. And I do remember if we sent in too many referrals in the year, like you would have somebody come over from special ed and just gently talk about what you're doing to keep them from getting to referrals and putting those things in place. I think the district was trying to comply with the ideal number that TEA gave.

Participant C recounted how the PBMAS monitoring of special education enrollment rates impacted local thoughts and behaviors around identifying students for special education in her district:

They had various things that they looked at, but one of the things that they looked at was overidentification. And it became almost to the point where people toward the end before they got rid of the indicator – people were kind of afraid to overidentify. I think that it [PBMAS] did make us look very very carefully at students that we were identifying.

Participant D expressed similar recollections around the influence of the PBMAS indicator on monitoring special education enrollment rates:

I think there was pressure to keep your number or you would be in trouble, and I think that came from TEA. It was just like anything else; it was an expectation. And I don't know that anybody ever got in trouble. I don't know that anybody got written up, but we anticipated not getting good scores from TEA due to that, because they are grading you.

All four participants expressed an understanding of the overall identification indicator in the PBMAS and the need for districts to conform to the expectation for rates as identified within the system. Participant A, who experienced the lowest baseline rate and smallest rate of decline relative to the four, spoke to her understanding of the messaging and how it impacted other districts. Participants B and C addressed how presence of the indicator altered thoughts and behaviors around the referral process in their districts. Participant D, who experienced the highest baseline rate and greatest decline in enrollment, described the punitive nature of the PBMAS system and need for compliance that was motivated by fear.

PBMAS and significant disproportionality.

Another area that emerged as a possible influence on rates of identification within the PBMAS system was monitoring of significant disproportionality. The IDEA requires that state education agencies identify districts who place groups of students with disabilities in more restrictive settings. TEA complies with this federal requirement through the monitoring of significant disproportionality within PBMAS. Although the significant disproportionality indicator in PBMAS has evolved in scope and methodology since its initial implementation in 2004, when a district is identified as having significant disproportionality, TEA assigns

performance levels that escalate as the rate of disproportionality grows. The assignment of higher performance levels results in required corrective action plans and monitoring by TEA. Those districts who demonstrate significant disproportionality over multiple years are also required to designate a portion of their federal IDEA funds towards activities designed to reduce disproportionality.

The impact of monitoring significant disproportionality within PBMAS emerged as an unexpected aspect within the theme of accountability and compliance. Although the initial question series did not include questions regarding significant disproportionality, responses by participants prompted discussion of this phenomenon.

Participant A shared her experiences during this time related to significant disproportionality and the approach that some districts took to achieve compliance in this area:

I had one particular district say, we are simply not allowed to refer African American children. I was floored, and I said why, and they said because we've overidentified in African American. And I said, I'm sorry, but I will do what's right for the child whether it skews your numbers or not.

I do know some districts put unwritten rules in place that would not allow that [referral] to occur. I think they were concerned about the corrective action that they would be put under with TEA.

Participant D shared similar experiences around the impact of monitoring significant disproportionality of certain races within PBMAS:

I mean if your number was up and it was a Hispanic male, then oh my gosh we're testing a Hispanic male, there goes that number. There's one more and we're already in trouble.

I think we were made to feel like that number is so high, you're definitely not doing what you're supposed to do to take care of that race, that ethnicity, that group of kids. I think that when that's published for everybody to look at and see, and to see that maybe one of your ethnicity groups is more represented than others, I think that puts the pressure on "we've done something wrong" And I think we were judged that way.

Two participants did not cite pressures regarding disproportionate placements by race/ethnicity. However, one stated that this was likely due to the more homogenous student population and the other mentioned growth and changing demographics as factors that likely mitigated the impact of significant disproportionality. Participant C described a shift in student demographics across the district where the Hispanic population grew, and White and African American declined. She explained that although her district was identified as having significant disproportionality; they did not change their referral practices in response to the indicator:

We were frequently not proportional as TEA would have wanted us to be, but it was based on our population, and you know we took the referrals as they came from the schools.

The fourth participant did not cite pressures regarding disproportionality by race/ethnicity. Participant B explained that with a very homogeneous student population, significant disproportionality has not been an area of concern:

We're 97% Hispanic here, so I don't really remember anything around ethnicity. I do remember more of that 10% being talked about, but nothing around ethnicity.

The implementation of PBMAS and monitoring of significant disproportionality emerged across two of the four participants as a possible reason for declining rates in enrollment during the timeframe examined. The third participant acknowledged that significant disproportionality

was problematic for her district, but it did not influence the approach to referrals. The fourth participant explained that significant disproportionality was not an issue for her school due to the homogeneous nature of her student population.

State assessment and accountability.

The final area within the theme of accountability and compliance is the influence of the state assessment and accountability system. As described in chapter two of this study, accountability systems have been found to influence enrollment in special education programs (Chakrabarti, 2013; Cullen & Reback, 2006; Figlio, 2006). The state assessment system in Texas initially allowed districts to exempt students with disabilities from testing in the early 1990s; however, in response to No Child Left Behind (NCLB), this exemption ended in the early 2000s. At that time, students with disabilities were required to participate in assessments designed at their instructional grade level, rather than their enrolled grade performance standards (TEA, 2011).

This practice continued until 2008, when all students, with few exceptions, were required to participate in state testing assessing enrolled grade-level curriculum. At that time, modified versions of the test were still available; however, the trend of increasing expectations continued, and in response to a federal directive, the state was required to discontinue this practice of offering modified testing in 2014. Since that time and with few exceptions, most students with disabilities have been required to participate in the same version of state assessments as their non-disabled peers.

Across three of the four interviews, a pattern emerged where participants described the incentive of identifying students for special education in the 1990s due to the benefit of exempting struggling students from state testing. This practice resulted in exclusion of their

performance from campus and district ratings on state accountability. As testing requirements increased, most students were included, and testing expectations grew. As a result of these changes, the incentive to identify students who were struggling academically for special education to approve the appearance of school and district performance declined. Participants shared beliefs and perceptions around what was happening in their local districts during this time where state testing was implemented, and the high stakes nature of test-based accountability grew.

When asked about the implication of students being identified for special education and its relationship to systems of test-based accountability, Participant B spoke directly to the change in state testing over time and its impact on special education enrollment:

That has really morphed and changed. When I initially started, they had SDAA (State Determined Alternative Assessment). And SDAA, if you had a special ed student they could take a reading test on their level. They could take a math test on their equivalent grade level. And so, I do think there was more of – I do think special ed kids were more successful. But I also think that there was really a push to get them identified, because it would help those scores by them taking the appropriate test.

Participant C echoed similar sentiments around how changes with the state testing system evolved and influenced considerations regarding special education enrollment over time:

The idea was at first, well put them in special ed. Let's get more kids in special ed because they don't count. Because at the beginning, the way they were counted in the accountability system was different.

As it changed, as the special ed students began to count more, then I think that the push to get more kids in special ed was less, because it wasn't helping the district one

way or another. Everything got counted. But at the very beginning, it was let's put more kids in special ed, and we had to fight to say no, they don't qualify and why they don't qualify. There was more justification I think for not putting kids in special ed at that particular time.

As Participant D shared her recollections around the influence of state testing, she specifically addressed the conflict between identifying students and the impact upon test-based systems of accountability:

I think the thought process – this is gonna sound real messed up – was we don't want so many numbers; however, if we can get those kids to qualify, their scores wouldn't count like everybody else's. So, our scores would be better. We needed to play the numbers game too.

So, I think you're getting hit both ways. The number can't be over this, but dadgum your number better be over here for this. So ... this is going to sound bad... who do we choose?

Three of four participants described the evolution of state testing and accountability and its impact on decisions related to referral and placement of students into special education. The one participant who did not identify this as a factor also demonstrated the lowest baseline rate and smallest change in program enrollment.

Within the systems of accountability theme, participants identified three areas influencing rates of identification for special education. The first two were related to monitoring and compliance requirements within the PBMAS in the areas of overall identification rates and significant disproportionality. The third was the influence of state assessment and accountability system changes over time. While the overall monitoring of special education rates clearly

influenced practitioners' thoughts and behaviors, participants described other aspects of accountability systems which likely also impacted identification rates.

Influence of the practitioner.

The third theme that emerged from analysis of the data was the influence of the practitioner and how variance among individuals can lead to inconsistencies with the application of decision-making as it relates to special education enrollment. This theme encompasses both the unique differences that leaders possess in their educational philosophy and values, as well as the impact of the practitioner due to variance across individuals in role-specific expertise. Participants recognized these factors as other possible reasons for the state's decline in special education enrollment.

Educational philosophy and values.

Each participant spoke to the influence of an individual's philosophy and how it can shape programmatic implementation, including the referral and identification of students with disabilities, in various ways. Participants recounted the importance of leaders' influence on a district interpretation and implementation of special education programs, as well as the dissonance between their values and maintaining compliance with systems of accountability. All participants addressed the importance of the leader in doing what is ethical, or right for kids.

Participant A stated her strong belief around the role or influence of the special education director in how the special education referral and identification process is implemented in a district:

I really believe the role, or the influence of the special education director or executive director really defines how it's [special education] implemented.

My passion has always been let's figure out where a student's deficits are, and let's figure out the why behind it, and then let's figure out what we do with it. I've always been one who said you've got to look at the individual child and make reasonable recommendations based on their data, not force them through a rigid process [pre-referral requirements].

I've always viewed public school as my mission field, if that resonates with you at all, because I'm here to champion for the kid who needs the champion. That's my why. That's why I come to work every day.

I have always been passionate about the underdog. I will always be passionate about the underdog. But I will admit I get very frustrated with the games we have to play.

Participant B shared her philosophy on making decisions in the best interest of students, despite pressures associated with monitoring rates of identification:

You know, there's black and white, and then there's a huge area of grey when you're working with kids. It's really about the kids' best interest.

I feel like our district kept a good eye on it; however, it kind of is what it is... if they qualified, they qualified. I mean, you can't deny a student services – that's illegal and unethical, so I feel like they just did what they had to do. If a student qualified, did we look at it? Were we trying to be mindful of it? Sure. But at the end of the day, what it was, was what it was.

Participant B also shared her thoughts as they relate to an ethical obligation to refer a child then a disability is suspected:

I think sometimes even when in doubt, I will coach my staff let's go ahead and do an evaluation, because then we know what we know. If we're on the line about it, we just need to do it. We owe it to the child.

Participant C echoed similar sentiments around the importance of helping students in need and frustration with the systems that seemed to create barriers to accomplishing this mission:

And our motto was if a kid needs help, we're gonna help them. If they get identified, we're going to serve them no matter what the indicators are. We never went over, but I just thought it was an arbitrary thing anyway. It wasn't based on anything in particular.

It did make me angry at times to think that we were being judged based on a population that we had. It did bother me. It bothered me that I felt like TEA was overreaching. I thought they were overreaching on some of these things, especially that one. That one made no sense to me.

I got very disillusioned in the 2000s, because I felt like we were not... special education was not going in the direction it should go. Meaning that instead of looking at programs and looking at how we were actually working with kids and doing things, it was all data driven.

Now I think that you need to have the accountability obviously and you need to have data looked at obviously, but when that's the only thing you're really looking at and that's the only thing you really have to be accountable for, you lose the essence of the program. You lose the essence of the program, and it bothered me. It bothered me a lot because I felt like that's not what we were there for. We were there for the kids, and to

try to be as creative as we could to get the best for them. And we were kind of not being able to do that.

In addition to her philosophy surrounding special education identification, Participant C described the influence of the Superintendent on whether special education programs were an area of focus or not:

Honestly, we had a lot of different superintendents, so it would depend on who the superintendent was at the time. Some superintendents were very aware of the data, and it was important to them. And others felt like they had other priorities because our overall data did not look good.

Participant D described dissonance between her desire to help students and comply with the narrative of keeping students out of special education:

I think that from whenever I was a teacher until that time, you tried to keep kids out of special education. I think that you're most needy kids that really needed it is what we did.

Kids that need special education should have special education. And there shouldn't be a number on that. But also, kids that don't need it – I shouldn't be because the state of Texas, and that's what started the whole thing.

I think people still look at those numbers, and our numbers are pretty high. So I think that's always gonna be like, "are we over? Are we under?" I still think that way, because that's the way I was taught to think.

What all can we do to keep that number down? Is there something different that we could be doing? Is there something different that we could offer?

And I don't necessarily think that's always a negative, because if you don't have to label a kid to take care of them and help them succeed, then I think we should do that too.

But I do think that there probably were some kids that needed the help, that didn't get the help because of the point system and because of the pressure. I think it hurts your heart because we don't go into education to get rich. We always want to do what's best for kids. If you are a true educator, a true teacher, a true missionary – you want to do what's right for kids.

All four participants shared sentiments regarding to the importance of doing what is right for students, including the pursuit of evaluation and provision of special education services when needed. Participants also unanimously spoke to the dissonance felt between doing what is right and doing what is required; however, one participant also expressed the ongoing impact to her thoughts and concerns about overidentifying students. This additional layer of continued impact could perhaps be explained by the context of her prior experiences in a district who had both a higher baseline rate and more significant decline in enrollment.

Role specific expertise.

Another area that emerged within the influence of the practitioner is the importance of role-specific expertise. Participants emphasized that this was particularly important as it relates to evaluation personnel who are responsible for the evaluation and identification of students through the referral process.

In discussing her transition to her current role and district, Participant A noted that, “we were truly under identifying” with a rate of only 7.2 percent six years ago. She described knowing that there was a problem, but needing to discover why this was occurring in District A:

What I uncovered was we did not have a common way of identifying a learning disability. So at a particular campus, you wouldn't qualify and at another campus you would with the same data.

Participant A described how the evaluator's expertise in understanding the nuance of identifying a specific learning disability impacts the outcome of the evaluation:

Depending on the depth of understanding of the diagnostician, really was the direct factor or correlate to a student qualifying, and what we were finding is when you get into the narrow abilities, you really have a good understanding of the task demand and what that narrow ability measures compared to the other narrow ability that's being measured, compared to what's happening in the classroom. As I've done consulting around the state, I find that there's a real lack of depth of understanding that.

It felt like people were grasping at straws due to a lack of understanding of what a LD [learning disability] truly is and how it manifests itself in the classroom. Depending again on the skillset of the Diagnostician or LSSP (Licensed Specialist in School Psychology), that determined whether they ended up staying in special education or were dismissed altogether.

In continuing her thoughts around the importance of reducing the variance of expertise across evaluation staff, Participant A shared the following:

And so we have worked very hard to be cohesive and to calibrate. We've instituted review committee processes with the whole team looking at the data. And I do think that has helped tremendously because some of the diagnosticians who are hardcore and always said no, they are now seeing, oh gosh yes, I missed that. And it's not out of spite or anything, it's just they didn't know.

Participant B reflected upon students who did not previously qualify and mused that she thought they might in today's time:

A lot of it can depend on your diagnostician too, cause sometimes those black and white numbers, you need to do some outlier tests, too.

Participant C explained that due to the small size of her district, she was heavily involved in the referral and evaluation process. She indicated that the smaller program scope promoted consistency and resulted in less variance based upon individuals' expertise:

We were not really really large, so I was able to review and look at the referral process on each of the campuses, and also to try to make changes and make sure that it was tight. And then with my staff, we would discuss different types of assessments.

Three of four participants discussed the importance of role-specific expertise as it relates to evaluation and identification practices. All emphasized the importance of evaluators having expertise in assessment practices and how varied expertise creates varied results in eligibility. Participant A, whose district had the lowest baseline rate and least change in rates, expressed that this was a factor in her district under identifying students. Despite her prior experience as a diagnostician, Participant D did not identify this area as a factor influencing declining rates of eligibility.

Program growth and associated challenges.

The fourth and final theme that emerged from the data is related to program growth and associated challenges experienced over the past five years. Following the Houston Chronicle's seven article series in 2016 alleging the systematic denial of special education services to students in Texas, the number of students receiving special education services has grown each year. The TEA 2021 Annual Report highlights special education program growth as increasing

from 8.9 percent in the 2016-2017 school year to 11.3 percent in the 2020-2021 year, which equates to more than 127 thousand additional students served. Along with the growing number of eligible students, participants also identified the resulting scarcity of available resources as an associated challenge in meeting these student needs. Lastly, the emphasis on systems of accountability over quality of programming was an area where participants expressed a common sentiment of frustration.

Program growth.

Growth in the number of students eligible for special education has occurred across the four participants' districts. To provide additional context regarding the enrollment changes that have occurred in the four districts, I conducted an analysis of district snapshot data in the 2016-2017 and 2020-2021 school years. During this timeframe, District A demonstrated stable enrollment numbers with their total student population; however, the rate of eligible special education students grew from eight percent to 10 percent. District B showed an overall student enrollment decline of almost four percent; however, their special education population grew from 10 to 11 percent. Of the districts included in my study, District C saw the greatest decline in total student enrollment of almost eight percent, while their percent of eligible students in special education grew from eight to fourteen percent. District D experienced the largest total student enrollment growth with a 19 percent increase, and their special education population increased from eight percent to 10 percent during this time.

Participant A recounted recent and significant growth in her special education population, despite overall stable enrollment in the district:

In the last 5 years, we've grown by 350 kids identified in special education.

When I came to this district, we were truly under identifying. We were only at 7.2 percent. We are now at 9.9 percent.

Participant B noted the impact of parent involvement and awareness upon the increase in referrals and subsequent growth of her district's program:

I would say in the last few years, I think there's a bigger movement where parents – and this is a great thing – are just super more aware and are advocating, and we honestly are having a lot more parent requests for testing than in the past. I think we have a lot more parent requests than we've ever had, especially in areas far more than learning disability, like Autism.

Although she was retired during the much of the past five-year period, Participant C shared her thoughts based upon her knowledge of current practices in the district:

I do know the referral process has completely changed, and apparently, they're now testing lots and lots of kids, and the co-op population has like doubled, almost tripled since I retired. Which is kind of like the way it was before when we referred everybody and everybody got evaluated.

There's just lots and lots more kids, and I think it's because TEA, it seems to me from what I've gleaned, everybody that has a problem gets tested. And I think that has been very hard on the smaller districts.

Participant D expressed the impact of not only more students qualifying for services, but also growth experienced from students moving into her fast-growth district:

I have a ton of kids. We've had 600 kids move into our district this year, and at least 100 of those were mine that were already qualified.

Because we're really a fast-growing district, our numbers have increased. I can't remember if they said they increased by one or two hundred a year. This year, we've had 600 kids move in, and so we expect to continue our growth to continue.

Participants all attributed the program growth to both an increase in the number of initial referrals, and the district with highest overall enrollment growth also identified that there are more students with established eligibility moving into their district.

Scarcity of resources to meet student needs.

Along with growing numbers, increasing student needs were also identified by all three interview participants who are current practitioners. This recent statewide growth has led to an increase in demand for personnel to evaluate and serve students, as well as provide ongoing training and support for these individuals. These resources require not only available personnel, but also funding to support the recruitment and retention of additional staff.

Participant A expressed her concern about this recent phenomenon and the financial and personnel constraints that make meeting these needs especially challenging:

My current worry is how to meet the kids' needs, because our [overall] student population is not growing, but our special education population is, and we are financially operating in a deficit. A tremendous deficit. So we can't add teachers, because we pay millions back to TEA every year. Millions. So we're in a desperate situation with financial... we've already been told there will not be any added positions next year.

If we continue to identify kids, who's serving them? We're really getting to a dangerous tipping point, but the growth rate has been... and I think it's just going to skyrocket with the changes recently.

But it is frustrating when you are strapped with funding or strapped with people. I am very concerned about our future in public education. I think we are going to see teachers leaving in droves because they are not treated with respect. I think we're going to see administrators leaving... Diagnosticians, LSSPs, speech paths... I mean you just fill in all those areas.

Participant B echoed concerns regarding available funding, but also noted the increase in severity of needs within her campus programs and subsequent need for staff training:

I honestly have felt like that special education requires a lot of extra services that are not funded by SPED. They come from nowhere – magic land.

My early childhood special education (ECSE) and functional academic rooms are overflowing, and they are severe medical needs, severe autism, like the disabilities are much heavier – it is not just speech impaired any longer.

Because you can't say we can't provide this, we don't have this person, we don't have these personnel legally in an ARD. You have to make a way for it to happen.

Participant D noted that the severity of students needs has grown in recent years:

This year we've had so many really severe things I've never seen in my life before.

Lots of physical disabilities that I've never seen. But with [DISTRICT], we're on a continual growth, and so I think that means our special education numbers will continue to grow.

Concerns regarding the scarcity of resources with which to meet growing needs were identified by three of four participants. All three participants who identified needs for additional resources including personnel, training, and support are current practitioners. The one participant

who did not identify concerns regarding current availability of resources is retired and potentially less familiar with resources and needs that exist within the program today.

Emphasis on compliance-based accountability.

The final area of difficulty that emerged within the theme of program growth and challenges was related to an emphasis on accountability and compliance over the quality of programming and outcomes for students with disabilities. With the implementation of the TEA Special Education Strategic Plan in 2018 in response to federal findings of noncompliance, monitoring activities been greatly enhanced, and districts are required to engage in both on-site and desk monitoring activities. Participants shared their perceptions related to compliance-based systems of accountability, including federal and state systems of accountability.

Participant A shared her experiences with the difficulty of facing scrutiny and criticism, as well as her frustrations with the impact of state and federal mandates on local districts:

I love what I do, and I love the work we do for kids. I just wish people could see and respect and appreciate what we do. I really do. It's hard. It's hard to keep everybody else pumped and encouraged to keep working their tails off when people are critical. It very much feels like TEA ticked off OSEP, and now they're just trying to one-up each other. And the people who are hurting in the process of this mudslinging event are us who are in the district. I know there are federal hoops you have to jump through, which a lot of the state hoops are the federal hoops. Yet your own state makes your own rules that added to it and make it a little more complex.

I truly believe people who are being punished are the ones who are in a district.

Participant B also acknowledged the impact of test-based accountability systems and questioned how assessments could more authentically measure outcomes for students with disabilities:

I think over the last couple of years, we have really been more strategic in thinking about how students receive services that are best for them.

I do feel like with the increase in needs that we're meeting in the classroom and that accountability continues to go up, I would really love to see if we would truly look at how we test SPED students. What is a fair standard for them?

Participant C focused on the purpose of special education services, and expressed how the emphasis on identification and compliance can overshadow high quality programming:

I hope that we will get to a point, which I don't know that we ever will, where we're really more realistic about what special education can do, and as far as the identification process – I think that we understand how to do that, I just don't necessarily know at the state level that we know what to do once we've identified. We can identify easily, but that's not the whole picture. And sometimes we stop at that point.

Participant D voiced frustration with the scrutiny of being judged and acknowledged that there were likely students who should have received services:

I think we've almost lost, that's how I feel on this side of it, we've almost lost the special in special education because everybody has something now.

I would hope that as a district I would be able to do what's best for kids without the pressure of being judged one way or the other.

I feel like we're always under scrutiny no matter what we do. I feel like we're being scrutinized. You're damned if you do, and you're damned if you don't. I think we were getting in trouble because there were too many, and now it's like "oh my gosh, test everybody and their dog" Because you probably missed somebody. And guess what? We probably did.

All four participants expressed concerns around compliance-based systems of accountability, including federal and state systems of accountability, and the impact upon special education enrollment and programming. Participants' baseline rates and change in enrollment did not appear to influence their perspective related to the emphasis on compliance-based accountability systems.

Funding systems for special education.

Based upon a review of the literature, I hypothesized that systems of funding for special education would emerge as a possible reason for changing rates of special education. Although participants did not identify funding as a possible factor contributing to the decline of enrollment rates in this study, it is discussed within the findings to provide additional context regarding the responses of participants. When participants were asked specifically if there was any internal consideration or discussions that they could recall around funding implications associated with higher rates of identification for students in special education, participants didn't express any indication that this played a role in changing rates.

Participant A recalled that she did hear comments like, "our funding is dropping because we don't have the numbers in special education that we used to have".

When asked about the impact of funding, Participant B responded:

No. I honestly have felt like that special education requires a lot of extra services that are not funded by SPED. They come from nowhere – magic land.

When initially asked, participant C recalled that there really weren't that many conversations. However, later in the interview as she mused about the arbitrary nature of enrollment monitoring and stated:

I always thought it was based on money probably – I don't know if that was true or not, but it always made sense to me that the more kids you had, the more you had to pay.

Participant D responded to the question specifically asking about funding by saying, "I don't know that we ever had that discussion."

As described within the review of literature, previous research has addressed the exponential growth of special education programs and associated funding from the late 1970s until the 2000s. With only a small percentage of special education funding coming from federal dollars (Parrish and Chambers, 1996), the growing cost of educating students with disabilities gained attention at both the state and federal level in the 1990s (Chambers, Parrish, & Harr, 2002). Special education spending across the U.S. in 1999-2000 was estimated to be \$50 billion, or \$5,918 per pupil, above the cost of educating non-disabled students. Higher rates of identification in Texas in the 1990s were associated with fiscal incentives (Cullen, 2003), and in 1998-1999 the state fiscal appropriations to special education were approximately \$1.5 billion, or \$3,109 per student.

The Interim Report to the 79th Texas Legislature (2004) stated that they [legislators] should "determine what aspects of our current funding mechanism for special education encourage overidentification; and then investigate alternative methods for funding special

education that decrease any incentives to overidentify students as needing special education services” (p. 52), clearly setting the stage for a discussion surrounding rates of special education identification in the state. The subsequent implementation of the overall enrollment indicator within the special education aspect of the PBMAS shortly followed these recommendations.

Although these findings and events would support the influence of funding incentives on changing rates of special education enrollment, the individuals participating in this study did not substantiate that funding had an impact on decisions regarding referral and identification at the local level.

Summary

In this multi-case study, four participants were chosen from districts who represented unique positionality related to the significant statewide decline in special education enrollment experienced beginning in the early 2000s. An analysis of the data from this multi-case study yielded four themes including Referral, Evaluation, and Identification Practices; Systems of Accountability; Influence of the Practitioner; and Program Growth and Challenges. Although expected the impact of funding on enrollment rates did not emerge as a theme in response to the research questions.

Within the theme of referral, evaluation, and identification practices, four aspects of the theme emerged: response to intervention, evolving evaluation methods for specific learning disabilities, and enhanced understanding of child find. While participants often shared similar perceptions around the impact of these factors on declining rates, there was some variance that may be attributed to the context of their district or professional experiences. Participant D, whose district had the higher baseline rate and greater magnitude of declining special education enrollment, expressed the most cynical view related to implementation of the RTI program and

did not find any benefit to the model. When discussing evolving evaluation methods for significant learning disabilities, participant C, whose professional experience does not include evaluation like the other three participants, did not verbalize any connection between the evaluation methodology change and enrollment decline. Participants' context related to their district profile and professional experience did not appear to influence their positionality around changing scope of evaluations or understanding of child find.

The theme around systems of accountability included three components: PBMAS and overall identification rates, PBMAS and significant disproportionality, and state assessment and accountability. Participants unanimously agreed that the PBMAS indicator monitoring overall identification rates was an important factor in declining statewide rates; however, the participant whose district had the higher baseline rate and greater magnitude of declining special education enrollment (Participant D), also emphasized the punitive nature of PBMAS in her responses.

The influence of monitoring significant disproportionality emerged across two of the four participants as a possible reason for declining rates in enrollment during the timeframe examined; however, the other two participants also discussed awareness of this factor for others. The degree of homogeneity of a district's overall population appears to be correlated with whether this was a concern for participants.

When discussing state assessment and accountability, three of four participants addressed the influence of these systems upon identification practices. The one participant who did not identify this as a factor (District A) also demonstrated the lowest baseline rate and smallest change in program enrollment.

Within the theme encompassing the influence of the practitioner, educational philosophy and values of the leader and role specific expertise of the evaluator emerged as important

aspects. While all four participants shared sentiments regarding to the importance of doing what is right for students, one participant also expressed an ongoing influence on her thoughts and concerns about overidentifying students. This difference in response might be explained by the context of the participant's prior experiences in a district who had both a higher baseline rate and more significant decline in enrollment. Three of four participants discussed the importance of role-specific expertise as it relates to evaluation and identification practices; however, there did not appear to be any correlation between response and district context or professional experiences.

The final theme that emerged from analysis of interview data was program growth and associated challenges. While all participants expressed that this has been due to an increase in the number of initial referrals, the district with highest overall student enrollment growth also identified that there are more students with established eligibility moving into their district. Three of four participants expressed concerns regarding the scarcity of resources with which to meet growing needs, and the one who did not is retired. All four participants expressed concerns around compliance-based systems of accountability and their impact upon special education enrollment and programming. Participants' baseline rates and change in enrollment did not appear to influence their perspective related to the emphasis on compliance-based accountability systems.

CHAPTER V

SUMMARY, DISCUSSION, CONCLUSIONS

This chapter begins with a summary of the study, then provides a discussion of the findings and an analysis of the supporting data. Additionally, suggestions around implications for practice and recommendations for future research are provided within this chapter.

Summary

The intent of this study was to gain perspective regarding the influence of the Performance Based Monitoring and Analysis System (PBMAS) and other possible factors influencing changing rates of special education enrollment in Texas over the past two decades. As a practitioner in the field, my direct observations and experiences, coupled with a review of prior research regarding variables found to influence special education enrollment rates, suggest that there are a variety of possible explanations for the phenomena experienced in Texas. In a recent study of the declining special education enrollment rates, researchers found that Texas school districts with the highest special education enrollment rates prior to the implementation of PBMAS saw the greatest reduction in enrollment after PBMAS was implemented (DeMatthews & Knight, 2019). Consideration of these recent findings informed the process of grouping districts for participant selection to better gain a wider variety of perspectives and experiences of practitioners.

While the monitoring of overall identification rates in PBMAS clearly influenced declining enrollment rates, this system of monitoring was implemented five years after the statewide decline in rates began. This timing would support the hypothesis that other factors influenced the declining rates, and this study seeks to better understand the complexity around

these reasons, as well as the changes that have occurred over the past five years with increasing enrollment.

Over the past twenty years, policy changes have influenced local practices and decision-making around the identification of students for special education services. These changes include both federal and state policies and involve factors such as the enactment of No Child Left Behind (NCLB, 2001), reauthorization of the Individuals with Disabilities Education Act (IDEA, 2004), implementation of PBMAS indicators (overall identification and significant disproportionality), application of the Response to Intervention (RTI) model for underperforming students, revision of the methodology in which specific learning disabilities are determined, and changes within systems of assessment and accountability.

While understanding the cumulative and specific effects of these numerous changes is beyond the scope of this study, the complexity of implementing such sweeping legislation and change would suggest that attributing the implementation of an indicator monitoring overall special education enrollment rates as part of the PBMAS as the sole reason for the enrollment decline is an oversimplification of the diminishing enrollment phenomenon experienced in Texas.

This study sought to better understand not only the impact of the PBMAS, but also explore other possible reasons for the enrollment decline by gathering the perspectives and beliefs of school administrators with direct knowledge in the field during the period of interest. Additionally, the study addresses the enrollment increase and associated challenges that have emerged over the past five years following the Houston Chronicle seven-part series of articles surrounding the denial special education services to eligible students through the TEA's use of an "enrollment cap."

Purpose of the study

The purpose of this study was to investigate factors contributing to changing special education enrollment trends in Texas that began in 1999-2000 by examining fluctuating identification rates at state and local levels and gaining perspective from school personnel with direct knowledge of special education enrollment practices and the impact of federal and state policies. By using a purposeful selection process where districts were divided into four groups representing both high and low baseline rates of special education identification and high and low rates of change during the period of statewide enrollment decline, I hoped to gain perspectives of individuals whose experience was varied based on not only their personal experiences, but also the context of the school districts. The study explored possible causal factors through a descriptive analysis of the data and deepened understanding through interviewing key school personnel with direct knowledge of identification practices in districts during the specified timeframe.

Theoretical framework

The theory of institutional choice as a framework for evaluating educational policy offers the benefits of predicting and clarifying issues in educational policy and suggesting significant issues for future research (Clune, 1987). Gormley (1987) describes institutional policy analysis as the study of government reform and its consequences. This approach to analyzing policy focuses on procedural choices, the redefinition of relationships within government, or decisions that affect the influence of outsiders on government itself.

Institutional choice provides an appropriate theoretical framework for this study due to the numerous federal and state policies affecting special education that were enacted during this time. Differing from other traditional approaches to policy analysis which examine components

of the political process to enhance understanding, this methodology seeks to understand the substantive consequences of institutional change. Using the lens of institutional choice, this study seeks to better understand the consequences of policies impacting special education enrollment declines and provide recommendations for further consideration.

Discussion

This discussion of this study is framed around the three research questions posed and rooted in the theoretical framework of institutional choice. Within chapter five, a comprehensive description of the four themes that emerged related to the research questions was provided. These themes include referral, evaluation, and identification practices; systems of accountability; influence of the practitioner; and program growth and challenges. The discussion will provide further contextualization of these themes to answer the three research questions.

Research question one. How did the implementation of special education enrollment targets in the Performance Based Monitoring and Analysis System (PBMAS) influence school administrators' decisions regarding special education identification in Texas?

Systems of accountability and their influence on rates of identification for special education emerged as a central theme in this study. One central aspect within the theme of accountability was the monitoring of overall identification rates within the PBMAS system.

In its inaugural year of implementation in 2004, the first indicator of 15 total within the special education monitoring aspect of PBMAS was special education identification. As described in the 2004 PBMAS manual, this indicator was based upon the percentage of students in the district identified as receiving special education services. Districts with at least 30 special education students in the 2003-2004 school year were rated with performance levels of zero (met standard – the district identification of students to receive special education services is 8.5

percent or lower), performance level one (8.6-11.0 percent), performance level two (11.1 - 16.0 percent), or performance level three (16.1 percent or higher). These performance levels were one of several evaluation criteria used by the Texas Education Agency (TEA) to identify districts for further intervention or monitoring. While the indicators and specific criteria for performance levels throughout the PBMAS system have changed over time, the performance level zero of the district special education identification rate remained at 8.5 percent until the special education identification (representation) indicator was eliminated in the 2017 PBMAS system.

The PBMAS system of monitoring special education rates was identified as a reason for declining enrollment across all four interviews. Participants all described an awareness of the monitoring system, and recounted messages from both the TEA and their local districts regarding compliance with the system's target rates. Respondents consistently described the pressure from TEA to comply with the expectation of the state as monitored within PBMAS system to avoid corrective actions. Districts who demonstrated escalated performance levels within the system would not only be required to engage in writing corrective action plans, but if multiple areas were flagged within the system, then it could trigger an on-site visit from the TEA to investigate whether there were additional areas of concern or non-compliance. These punitive measures were described by one participant as making the district "afraid to overidentify". Regardless of their district's initial rate when the indicator was implemented, participants all shared a common understanding of the expectation to comply with the expected rate of identification as outlined within the PBMAS system by TEA.

The impact of monitoring overall rates of identification through the implementation of the PBMAS indicator system was clearly felt by all participants. These findings are consistent with a recent qualitative document analysis conducted by DeMatthews and Knight (2019) using

reports, media-related documents, government documents produced by TEA and OSEP, and internal district documents that were publicly accessible which found that district administrators felt pressured to comply with TEA despite recognizing that students were inappropriately delayed or denied services.

Findings from this study affirmed that the PBMAS indicator monitoring the percent of students receiving special education services in a district had a direct and substantial impact on the thoughts and behaviors of school personnel through the application of pressure to comply with TEA's system of monitoring the overall rates of special education identification in districts.

Research question two. What do school administrators perceive regarding other factors that may have influenced the decline in special education enrollment rates?

Based upon my review of the literature, I was hypothesized that additional factors participants might identify as variables that influenced the decline in special education would include variance in evaluation and identification practices, systems of accountability, and funding incentives. The perceptions shared by participants support the influence of systems of accountability and variance in evaluation and identification practices as central to the rationale for enrollment declines; however, the impact of funding incentives was not reported as a significant reason for declining rates by any respondent. Participant responses provide a much greater depth and breadth to understanding the complexity of the enrollment decline and consequent denial of services to students with disabilities.

Impact of accountability systems.

As explained by DeMatthews and Knight (2019), a large body of research has focused on the impact of state accountability systems and the unintended consequences often associated with this approach to school improvement, yet the impact of these systems upon special education has

been overlooked by researchers. Interview participants discussed the influence of the compliance-based system of monitoring of significant disproportionality within PBMAS and the effect of the state assessment and accountability system.

PBMAS and significant disproportionality.

As described within the earlier discussion of PBMAS, this accountability system initially included 15 indicators monitoring the performance of special education programs in school districts. While the SPED Identification (later representation) indicator has received well deserved attention as a reason for declining rates, other indicators also exist within the system serve to limit enrollment of specific student groups. Unlike the overall identification rating that was unique to Texas, these other indicators were included to comply with federal requirements and serve to monitor significant disproportionality within the special education population based on race or other identifiers such as Limited English Proficiency (LEP).

The PBMAS system indicator for significant disproportionality was calculated by using the rate of students in special education in each of these groups (African American, Hispanic, LEP) and then comparing that percentage to the district's overall proportion of students falling within the population. If the population within special education exceeded that of the overall population in the district, the district would be assigned a higher performance level for that indicator. Districts who demonstrate significant disproportionality within the PBMAS system are not only required to engage in corrective actions, but also required to set aside 15 percent of their federal IDEA-B funds to address the problem if the presence of significant disproportionality persists over several years. While the body of research debating the appropriateness of significant disproportionality as a measure of programmatic performance continues to grow (Cruz & Rodl, 2018; Fish, 2019; Zhang, Katsiyannis, Ju, & Roberts, 2014), the use of these

indicators in the PBMAS were reported by some participants as a reason for limiting enrollment of specific students in special education programs.

Participants all expressed an awareness of significant disproportionality indicators and their inclusion in the monitoring system. Those with more homogeneous student populations were less concerned with these indicators; however, two of the four participants discussed the impact of monitoring significant disproportionality within PBMAS on declining rates. One participant recalled an incident during the time of declining statewide enrollment when she was working as a consultant and being told that, “we are simply not allowed to refer African American children” to special education because the district was overidentified in that area. This same participant expressed frustration with existing challenges in her district related to significant disproportionality based upon the number of Asian students with disabilities in her district.

Another participant shared her experience during the time of declining rates with the overidentification of Hispanic students and the perception that this indicator presumes that you’re not “doing what you’re supposed to do to take care of that race, that ethnicity, that group of kids”. Despite her current district not demonstrating any significant disproportionality within special education identification, this period of time where the number of Hispanic students in special education meant that the district was “in trouble” is pervasive in her thoughts around identification.

Although the monitoring of significant disproportionality did not emerge as a central reason for declining rates across all participants, it is important to recognize that participants with experience in districts where significant disproportionality was or is currently at an elevated level of performance within the PBMAS system perceive this indicator as a barrier to

appropriately identifying all eligible students. They described the indicator as putting pressure on the district and creating an environment where they are judged as discriminatory based upon numbers, rather than an evaluation of whether the district is meeting individual students' needs regardless of race or ethnicity.

Evolving state assessment and accountability systems.

Pressures associated with the state assessment and accountability system also emerged as an important factor that may have influenced rates of special education enrollment in Texas. During the 1990s, when high-stakes systems of test-based accountability were implemented, schools were initially allowed to exempt students from disabilities from the testing system and this practice helped to maximize ratings (Cullen & Reback, 2006). Special education enrollment increases were seen for exempted groups during the 1990s when this assessment exemption policy was implemented, and the trend was later reversed when the assessments of students in special education were counted in the state rating system (Deere & Strayer, 2001).

Although not specifically asked as part of the initial series of questions, three of four participants discussed the benefit of students qualifying for special education in the 1990s due to the desired positive impact on the state testing and accountability system. Participants recalled the evolution of state testing and its impact upon decisions related to the identification of special education students and described the advantage of identifying students for special education during this time. The three participants who discussed state testing all showed awareness that students who qualified for special education at that time could be exempt from state testing and not impact accountability ratings based primarily upon the results of these assessments. One participant described a "push to get them identified" during this time to improve the appearance of scores.

With the passage of NCLB in 2001, students with disabilities were required to participate in state testing and their scores were included in the calculation of campus and district state ratings. Participants identified that because of this change, schools were no longer motivated to identify students for special education so they could be excluded from state assessments. Of the three participants who addressed the impact of assessment and accountability on eligibility decisions, they all discussed the progression of rigor in state testing and increased accountability for the academic performance of all student groups. As one participant described this transition, “the push to get more kids in special ed was less, because it wasn’t helping the district one way or another”.

The implementation of NCLB, along with increasing rigor of state assessments in Texas occurred concurrently with the significant decline in special education enrollment. Three of four participants identified systems of state assessment and accountability as influencing decisions related to special education enrollment prior to and following the period of enrollment decline. The participating districts’ baseline special education eligibility rate or magnitude of decline during the early 2000s did not appear to be a factor in whether and to what degree this variable was discussed. As predicted and affirmed by participant responses, policies related to state assessment and accountability were an additional factor that likely influenced declining enrollment rates of students in special education during the early 2000s.

Impact of IDEA on referral, evaluation, and identification.

The next area identified by participants as influencing the decline in special education enrollment rates is related to changes that occurred with referral, evaluation, and identification practices following the reauthorization of the IDEA in 2004. These changes include the implementation of a more rigorous pre-referral process using the RTI model, evolution of

evaluation procedures for specific learning disabilities, and a narrower interpretation of Child Find requirements by both district personnel and families.

Response to Intervention.

When asked about how districts' practices related to special education referrals changed as RTI grew as a standard methodology prior to a referral to special education, all four interview participants agreed that the implementation of RTI resulted in declining special education referral and enrollment rates. With the reauthorization of IDEA in 2004, districts were required to consider whether a child received appropriate instruction prior to the referral to special education for suspected learning disabilities (34 CFR §300.309 (b)). The implementation of RTI in Texas did not include the provision of any statewide guidance, and districts were left to determine how and what these processes and procedures looked like at the local level.

Participants A and B both recalled that during the period of statewide declining rates there was a "big push" to provide interventions before to considering whether a child had a disability through the special education evaluation process. Participant C described a feeling of positivity around the initial implementation of RTI, as process was expected to ensure students were provided with appropriate instruction before considering the presence of an underlying disability. Participant D, whose district had the highest baseline special education rate of the four, shared a more cynical view of RTI and described it as a checklist to help with referrals, rather than a true methodology for students to receive appropriate intervention prior to referral.

Participant A recalled concerns about RTI delaying evaluations for students with significant needs, she also shared a similar sentiment to Participant C regarding the benefit of RTI and not referring students who had not had the opportunity to learn yet due to circumstances associated with being an English Language Learner (ELL) or having limited experiences in

school. Although District A was the only one of the four whose baseline rate was below the target 8.5 percent in PBMAS, it is possible that her experiences throughout the state with statewide professional organizations and consulting in other districts may have shaped her perspective beyond the experiences within her district.

Regardless of baseline rate or magnitude of change in enrollment during the period of statewide decline, all participants agreed that the implementation of RTI resulted in a decline in referrals to special education.

Changing evaluation procedures for specific learning disabilities.

The second area identified by participants within the theme of referral, evaluation and identification practices as a factor that led to declining rates of special education is the impact of changes that occurred with the identification process for specific learning disabilities. According to publicly available data from the TEA, the number of students whose primary disability was a specific learning disability declined from 265,335 (55 percent of students receiving special education services) in 1999-2000 to 163,264 (37 percent) during the 20013-2014 school year.

As diagnosticians and Licensed Specialists in School Psychology (LSSPs) shifted from a model of calculating simple discrepancies between intellectual ability and areas of academic achievement to a comprehensive evaluation of strengths and weaknesses, the complexity of this change in model required much learning and calibration among evaluators. This evolution of evaluation procedures for specific learning disabilities emerged across three of four interviews as a key factor in local practices that may have contributed to declining special education enrollment across the state.

When discussing these specific learning disability evaluation procedure changes, one participant described “a huge decline in eligibility” because evaluation staff did not yet

understand the new methodology for interpreting the assessment data during the period of a large learning curve. Another recalled many students not qualifying during the time when evaluation procedures changed, and another described the prior simple difference model as a “numbers game” relative to the more thorough process where you’re looking at all areas. There did not appear to be any relationship between three respondents who addressed the importance of the changes in specific learning disability evaluation procedures on declining rates and the districts’ baseline rate or magnitude of decline in special education enrollment during this time. The one respondent who did not identify this as a factor saw a four percent decline in enrollment during the period of statewide decline. Based upon the significant decline observed within the largest disability condition category in Texas and participant responses, the changes in methodology surrounding the identification of specific learning disabilities are likely another factor contributing to the statewide decline in rates.

Narrower interpretation of child find requirements.

The final area identified by participants within the theme of referral, evaluation, and identification practices is related to a narrower interpretation of Child Find during the period of enrollment decline. As described in 34 CFR § 300.111 of IDEA, states are required to have policies and procedures for child find to ensure that all children who are in need of special education and related services are identified, located, and evaluated. Participants described experiences related to how practices related to child find have changed over time and attributed these changes as another plausible reason for the statewide observed enrollment decline.

Although not specifically asked in the series of questions, participants described earlier experiences where the scope of students’ evaluations were not appropriate based upon the areas of suspected disability and need. For example, one participant recalled during this time that her

district had a disjointed evaluation process related to students were being evaluated only in the area of speech and language, despite having more significant and wider-ranging needs. This same participant discussed the inconsistent use of considering eligibility using certain categories, including noncategorical early childhood and dyslexia's inclusion in the category of specific learning disabilities.

Despite having limited direct involvement due to her role as a teacher and later as a principal, one participant addressed how evaluations were much less "in-depth" during the period of enrollment decline. Another reiterated her experience in seeing a narrower scope of evaluation during the time of statewide decline and explained that by expanding the scope of evaluations "you are going to find more". Participants all shared similar experiences in recalling how the scope of evaluations were narrower during time of statewide enrollment decline as compared to current practices.

Influence of the Practitioner.

The third theme described within Chapter IV which supports answering the second research question regarding other factors influencing enrollment decline is related to the influence of the practitioner. Participants reported that variance among practitioners' educational philosophy and values, along with job-specific expertise led to inconsistencies with the application of decision-making as it relates to special education eligibility determinations during the time of statewide decline.

Individual philosophy and values.

Participants shared their thoughts on the influence of educational leaders' philosophies and how they can shape programmatic implementation and rates of identification through the special education referral and identification process. One participant recalled the importance of

the special education director in “defining how special education is implemented, and she recalled during the period of decline that her director was focused more on compliance with evaluation timelines than conducting comprehensive and appropriate evaluations. The participant from group D, who had the highest baseline rate and greatest decline in enrollment, recalled that during the early implementation of PBMAS and increase monitoring of compliance-related indicators, there was dissonance between compliance with state mandates and the ethical obligation of serving students in need.

Despite seeing a four percent decline in enrollment during the examined timeframe and the district being mindful of the monitoring of overidentification, Participant B felt like the philosophy of leaders in her district was that they “did what they had to do” to not deny services to eligible students. Across all four interviews, participants described ethical obligations and the philosophy associated with serving students in need. While this sense of obligation to meet the needs of students was at odds with the state’s compliance-based system of reducing enrollment, participants all described the importance of leaders’ educational philosophy and values on the implementation of systems and supports to appropriately identify eligible students for special education.

Variance in practitioners’ role-specific expertise.

The impact of variance in role-specific expertise on special education eligibility determinations was an additional component within the theme of influence of the practitioner. Three of the four participants emphasized that this variance was particularly important as it relates to evaluation personnel who are responsible for the evaluation and identification of students through the referral process.

Participant A expressed that this practitioner variance to be particularly impactful as it relates to the evaluation of specific learning disabilities. As described previously, the changes experienced in this methodology were significant during the time of statewide enrollment decline, and without a common way of identifying students, they could qualify at one campus and not another using the same data. She reiterated that the outcomes of evaluations were often dependent on the depth of understanding of the evaluator, and during the time of decline there was little cohesion and calibration across districts and the state about how evaluations were conducted. Participant C echoed the sentiment that evaluation outcomes were often dependent on the diagnostician during this time due to the variance in role-specific expertise. The small size of district C allowed for this participant to take a much more direct and active role in the referral and evaluation process during this time, which helped to mitigate the variance that might have otherwise occurred.

Across three of four participants, variance in the role-specific expertise of evaluators were cited as a factor influencing rates of identification during the period of statewide decline. This variance was especially prevalent during this time, as evaluation practices were changing significantly in the largest category of eligibility, specific learning disabilities. Since that time, respondents reported that this variance has improved with increased consistency of evaluation procedures and calibration of the process for identifying students with learning disabilities.

Influence of special education funding systems

In evaluating other factors school administrators perceive to have influenced the statewide decline in special education enrollment rates, the impact of funding was hypothesized to emerge as a reason for changing special education enrollment rates; however, it did not. As described within the review of literature, previous research has addressed the exponential growth

of special education programs and associated funding from the late 1970s until the 2000s. With only a small percentage of special education funding coming from federal dollars (Parrish & Chambers, 1996), the growing cost of educating students with disabilities gained attention at both the state and federal level in the 1990s (Chambers, Parrish, & Harr, 2002).

Special education spending across the U.S. in 1999-2000 was estimated to be \$50 billion, or \$5,918 per pupil, above the cost of educating non-disabled students. Higher rates of identification in Texas in the 1990s were associated with fiscal incentives (Cullen, 2003), and in 1998-1999 the state fiscal appropriations to special education were approximately \$1.5 billion, or \$3,109 per student.

An Interim Report to the 79th Texas Legislature (2004) stated that they [legislators] should “determine what aspects of our current funding mechanism for special education encourage overidentification; and then investigate alternative methods for funding special education that decrease any incentives to overidentify students as needing special education services” (p. 52), clearly setting the stage for a discussion surrounding rates of special education identification in the state. The subsequent implementation of the overall enrollment indicator within the special education aspect of the PBMAS shortly followed these recommendations.

Although these findings and events would support the influence of funding incentives on changing rates of special education enrollment, the individuals participating in this study did not substantiate that funding had an impact on local decisions regarding referral and identification at the local level. These findings are consistent with Dempsey and Fuchs (1993) survey of special education directors in Tennessee indicating that service needs may have been more likely than monetary incentives to explain the observed changes.

Although prior research would suggest that the funding of special education and subsequent growth of the program and associated costs seen during the 1990s impacted the decline observed in the 2000s, the participants of this study did not perceive funding to be a significant factor. It is possible; however, that funding was a greater consideration for school superintendents and state level policy makers.

Research question three. How have special education enrollment practices and trends changed since the findings of noncompliance with federal law and implementation of a statewide corrective action plan?

The theme of program growth and challenges responds to this question and provides perspectives related to the experiences of participants during the past five years following the 2016 seven-part series of Houston Chronicle articles alleging the systematic denial of special education services to students in Texas. In response to this question, a brief overview of the corrective actions implemented by the TEA is provided, recent statewide enrollment data is shared, and research participants' perceptions associated with these changes are discussed.

Implementation of a statewide corrective action plan.

Following the conclusion of their statewide investigation during the 2016-2017 school year, the United States Department of Education, Office of Special Education Programs (OSEP) issued a letter of findings to the TEA in January 2018. This letter detailed three areas of noncompliance with the IDEA including (a) failure to ensure that all children with disabilities residing in the state who are in need of special education and related services were identified, located, and evaluated, (b) failed to ensure that FAPE was made available to all children with disabilities residing in the State in Texas's mandated age ranges (ages 3 through 21), and (c) TEA failed to fulfill its general supervisory and monitoring responsibilities as required by IDEA.

In response to findings of noncompliance, the TEA developed the Special Education Strategic Plan (2018) which outlines the agency's plan to increase state-level monitoring of districts and ensure that districts identify, evaluate, and offer a free and appropriate public education (FAPE) to all children suspected of having a disability and in need of special education and related services because of the disability (p. 15). The strategic plan also includes provisions for training, support, and development of educators; details components related to student, family, and community engagement; and provides for technical assistance networks and structures.

Recent special education enrollment growth and challenges.

Since the initial 2016 Houston Chronicle reports and subsequent findings of noncompliance by OSEP, Texas implemented a corrective action plan. As a result, significant special education program growth has been experienced across the state. The most recent Texas Academic Performance Report (TAPR) indicates that during the 2020-2021 school year, 11.1 percent of Texas public school students were enrolled in special education programming. This is a marked increase from the 2016-2017 report indicating 8.75 percent of students were in special education. As of the October 2020 snapshot, this 2.35 percentage point increase resulted in 128,274 additional students being served across the state over the since the initial Houston Chronicle series of reports.

Growth in the number of students eligible for special education has been experienced across each of the four districts over the past five years; however, the challenges are far greater than simply an increase in programmatic volume. Participants expressed concerns regarding growing intensity of students' needs and the limited availability of resources with which to meet them.

As described within Chapter IV, participating districts' special education enrollment numbers have all grown over the past five years. District C, the smallest district of the four, has shown the largest rate of increase with 66 percent program growth during this time. District D, with the highest initial baseline rate and largest decline prior to the recent growth, has demonstrated the next highest rate of growth, with a 55 percent special education enrollment increase. District A demonstrated the next highest rate of growth at 27 percent, and District B has seen their special education population increase by 8 percent.

When asked to share how special education identification has changed since the statewide scrutiny began in 2016, all participants shared that their special education programs have grown as a result. Regardless of their baseline rate, all participating districts reported program growth due to more students qualifying for services and one (Participant D) also reported that students with disabilities are transferring into their district at a higher rate than previously experienced.

Participants shared that along with the growth in numbers, student needs appear to be increasing. These growing numbers and needs have led to an increase in demand for personnel to both evaluate and serve students, while the financial resources to meet these needs have not kept up with the demand. One participant described that as a principal, the students on her campus are demonstrating disabilities that require a greater intensity of services. Another described the difficulty of managing growth within the special education program when her district is operating in a financial deficit. With federal funding contributing a small percentage of the overall budget to support special education, she shared concerns that her district will not be able to hire additional staff to meet the growing needs.

Dissonance of policy and practice.

The final area that emerged in participants' response to the third research question was the emphasis on accountability and compliance over the quality of programming for students with disabilities. Participants shared frustration with ongoing scrutiny and criticism resulting from these systems, as well as the impact of mandates and accountability systems on districts' time.

Participant A describes her observations of the interactions between federal and state compliance, and lamented that, "the people who are hurting in the process of this mudslinging event are us who are in the district". Participants all discussed the difficulty of implementing policy-related requirements, while feeling like their time could be better spent on activities that directly support improving student outcomes.

Other areas addressed by the participants of this study included issues such as the appropriateness of evaluating all students with disabilities using standardized measures of achievement and how the original purpose and intent of special education services has been overshadowed by compliance. Participant D summed this overarching sentiment expressed by all participants by stating her hope that she, "would be able to do what's best for kids without being judged one way or the other".

Summary of Findings by Participant District Context

The participant selection process was designed to elicit a wide range of experiences and perceptions regarding the variables influencing special education enrollment rates over the past two decades. By interviewing individuals from four districts with higher/lower baseline rates and greater/lower declines in program rates during the period of statewide decline, I hoped to gain insight regarding the varying circumstances of districts and provide context about how these different factors influenced my findings.

Across all four participants, the influence of the PBMAS monitoring of overall identification rates was consistently perceived to be an important factor in the statewide decline of special education enrollment rates. Even those individuals whose district did not have a higher baseline rate or experience a greater decline agreed that this PBMAS indicator influenced thoughts and behaviors at the local level regarding evaluation and identification of students for special education during this time period.

When considering other factors that influenced the statewide decline, all four participants also agreed that changes resulting from the implementation of RTI, changing scope of evaluations, and expanded interpretation of child find requirements were all contributing factors. Three of the four described how changing evaluation criteria for specific learning disabilities influenced the decline in rates. The one participant who did not identify this as a factor was in the group with a higher baseline and lower rate of decline; however, her experience as a teacher and campus administrator may have also contributed to this variance in perception.

The monitoring of significant disproportionality emerged across two of the four participants as influencing rates of special education. Based upon participants' responses, this perception was likely more closely related to the homogeneity of the district, rather than the grouping factors. Three of four participants described the increasing rigor and requirements of the state testing and accountability system as influencing rates of special education. The participant from the lower baseline, lower decline group did not identify this as a factor, suggesting that lower rates of special education may have reduced the impact of this variable upon her district's practices in relation to accountability systems and referrals for special education.

Among all four participants, sentiments emerged related to the importance of practitioners' philosophy and values as they relate to educational decision making. They spoke to the ethical obligation of school leaders and the dissonance that can arise between these obligations and compliance-based systems imposed through the implementation of policy. Three of four participants also reflected upon the importance of the role-specific expertise and how it can influence rates of eligibility. The one participant that did not express this belief was from the higher baseline, lower decline group.

Overall, the characteristics related to a district's baseline special education rate and magnitude of decline did not result in any notable trends related to the responses of participants. While the grouping method did provide a sample of participants with a wide-range of experiences in districts that are geographically and demographically diverse, the beliefs and perceptions of the individuals do not appear to be specifically associated with the higher/lower baseline rates or greater/lower declines experienced by the district.

Limitations

This study is limited to the analysis of publicly available data and interviews of four individuals. Although the study was designed to include practitioners representing a wide range of experiences, the inclusion of only four individuals is a limitation of the study when considering generalizability of the results. Analysis of the perceptions of the participants of the study are limited to the scope of this study and are not necessarily generalizable to the overall population.

As a practitioner within the field for the past 20 years, I approached this study with experience as a special education teacher, educational diagnostician, special education director. While the participants had no knowledge of my special education background, the expertise I

gained in these roles may have influenced the development of interview questions and interpretation of the results.

Implications for Practice

Designing and implementing appropriate and consistent methods to identify and serve eligible students with disabilities is a vital component of all public education agencies. A myriad of federal and state policies exists with the intent of accomplishing this important goal; however, there were additional driving forces as identified in this study that led to significant changes in enrollment rates over the past two decades.

Understanding these factors is an important first step in evaluating and considering future needs related to appropriately identifying students with disabilities. Although there were several factors identified in this study that led to a decline in enrollment rates, the recent surge in eligibility across the state would suggest that many of the reasons eligible students were not served in the past have been corrected. As suggested by participants, concerns about overidentification are resurfacing as the number of eligible students continues to grow. As a result, factors identified to have important implications for future practice include monitoring of significant disproportionality and consistent application of the RTI process as it relates to child find obligations.

Although the state has eliminated the monitoring of overall identification rates within the PBMAS system, rates of significant disproportionality of racial/ethnic groups continue to be a component of this accountability system. To address one of the core issues related to one of the issues with identification practices, further consideration of policies related to significant disproportionality and their implications should be considered. While the spirit of this policy is to prevent discriminatory practices and ensure that students are appropriately identified, the

methodology in its current form assumes that any presence of significant disproportionality is indicative of a problem or wrongdoing of the district.

In the PBMAS system, there is currently no opportunity for districts to provide an analysis of their student needs and evidence to support that they have appropriately identified students, which may result in the systematic denial of services to eligible students based upon race or ethnicity. The state should evaluate its methodology in identifying significant disproportionality to determine if there are alternate ways to meet this federal requirement, while also ensuring that it does not result in a denial of services to eligible students based upon race or ethnicity.

Since the inception of RTI as an expected practice in the mid-2000s, the state has not provided a clear framework or expectation regarding the use of an intervention framework. As described by participants, the implementation of RTI was a likely factor in declining eligibility due to the delay of evaluations while implementing the intervention process. Since this time, the importance of providing scaffolded supports to meet the unique academic and behavioral needs of students has grown, and this concept has evolved into a framework now known as Multi-Tiered Systems of Support (MTSS).

Texas lags other states in these practices, and a more concerted effort to support MTSS coupled with a strong understanding of Child Find obligations would help move the state towards a more appropriate balance of supporting and identifying students as appropriate. It is important that school personnel have a deeper understanding of the RTI process and how it can be used to effectively meet the needs of students, while also ensuring that the application of interventions prior to referral does not delay or deny special education evaluations for eligible students.

The impact for practitioners in the field remains. For many in the field, special education decisions are influenced by both policy and personal convictions. Often requirements for compliance with legislative mandates are at odds what an individual believes is right for students. While it might be easy to assume that educators should simply do what is right for students, the impact of sanctions, funding, and compliance-base systems are the reality that educational leaders must contend with as they navigate the balance between what is required and what is right. Until policymakers take into account professional expertise and judgement of educators over statistical computations, this tension will remain.

Suggestions for Further Research

Understanding policy related factors that have influenced past trends in special education enrollment rates is important, because it helps predict and clarify issues in the future. By understanding the relationships and decisions that led to declining enrollment, policymakers can better understand the consequences of their decisions and prevent any systematic denial of services to students in the future. One suggested area of future research is to evaluate of the impact of systematically monitoring and imposing consequences upon districts whose data indicates the presence of significant disproportionality. Additionally, research surrounding the implementation of RTI as it relates to referral and evaluation could provide greater insight into the effectiveness of these programs in mitigating the need for special education services and determine if their used results in a delay of services to eligible students.

Future research might also consider the generalizability of findings in this study through investigation with additional and various stakeholders who have knowledge of district level implementation.

Conclusions

Special education enrollment trends over the past two decades in Texas have been influenced by a multitude of federal and state policies, and there a myriad of possible reasons exist to explain these changes. The circumstances around why local practices changed in response to federal and state legislation cannot be explained by any single factor, and the unintended consequence of thousands of students not receiving needed services are severe and long-lasting.

Although the implementation of enrollment targets within the PBMAS definitively influenced a reduction in special education rates across the state, the impact of PBMAS is confounded by a host of other policy changes that occurred adjacent to the implementation of PBMAS. Other important factors that help explain this phenomenon as identified in this study include pressures associated with systems of assessment and accountability, changes in pre-referral and identification practices, and the influence of the practitioner.

An analysis of the interview data revealed that participants shared beliefs and experiences related to referral, evaluation, and identification that influenced the change in enrollment rates during the period of declining enrollment. While the PBMAS indicator monitoring overall identification rates had a direct and substantial impact upon district practices and a statewide decline in enrollment rates, there were other important factors that contributed to these effects. As identified by participants in this study, these factors include the implementation of RTI, changes in evaluation methodology for the identification of specific learning disabilities, and a narrower application of Child Find requirements.

The recent and substantial growth in enrollment rates across the state have strained local districts' resources as they seek to meet the growing demand for evaluation and provision of

services to eligible students. As a result, districts across the state are requiring more special education personnel, and high-quality training and support must be available to both general and special educators to ensure appropriate educational services for all students. The aftermath of what has occurred with special education in Texas over the past two decades is ongoing, and the effects will likely be felt for many years to come.

REFERENCES

- Attride-Stirling, J. (2001). Thematic networks: An analytic tool for qualitative research. *Qualitative Research*, 1, 385–405. doi:10.1177/ 146879410100100307
- Ballis, B. & Heath, K. (2020). The long run impacts of special education. (EdWorkingPaper: 19-151). Retrieved from Annenberg Institute at Brown University: <https://doi.org/10.26300/a6df-4266>
- Berkeley, S. (2009). Implementation of response to intervention: A snapshot of progress. *Journal of Learning Disabilities*, 42(1), 85-95. 10.1177/0022219408326214
- Braun, V., & Clarke, V. (2006). Using thematic analysis in psychology. *Qualitative Research in Psychology*, 3, 77–101. doi:10.1191/1478088706qp063oa
- Chakrabarti, R. (2013). Accountability with voucher threats, responses, and the test-taking population: Regression discontinuity evidence from Florida. *Education Finance and Policy*, 8(2), 121-167. 10.1162/EDFP_a_00088
- Chambers, J. G., Parrish, T. B., Harr, J. J., American Institutes for Research in the Behavioral Sciences, Palo Alto, CA Center for Special Education Finance. (2002). *What are we spending on special education services in the united states, 1999-2000? report. special education expenditure project (SEEP)*.
- Clune, William H. “Institutional Choice as a Theoretical Framework for Research on Educational Policy.” *Educational Evaluation and Policy Analysis* 9, no. 2 (1987): 117–32. <https://doi.org/10.2307/1163725>.

- Coutinho, M. J., & Oswald, D. P. (2000). Disproportionate representation in special education: A synthesis and recommendations. *Journal of Child & Family Studies*, 9(2), 135-156.
- Creswell, J. W. (2014). *Research Design: Qualitative, Quantitative and Mixed Methods Approaches* (4th ed.). Thousand Oaks, CA: Sage.
- Creswell, J.W. and Creswell, J.D. (2018). *Qualitative Inquiry and Research Design: Choosing Among Five Approaches*, Fifth Edition. Los Angeles: Sage Publications.
- Creswell, J. W., & Plano Clark, V. L. (2018). *Designing and conducting mixed methods research* (3rd ed.). Los Angeles: SAGE Publications.
- Cruz, R. A., & Rodl, J. E. (2018). An Integrative Synthesis of Literature on Disproportionality in Special Education., (1), 50–63. <https://doi.org/10.1177/0022466918758707>
- Cullen, J. B. (2003). *The impact of fiscal incentives on student disability rates* [http://ezproxy.library.tamu.edu/10.1016/S0047-2727\(01\)00203-1](http://ezproxy.library.tamu.edu/10.1016/S0047-2727(01)00203-1)
- Cullen, J.B., & Reback, R. (2006). *Tinkering toward accolades: School gaming under a performance accountability system*. Cambridge: National Bureau of Economic Research, Inc. doi: <http://dx.doi.org/10.3386/w12286>
- Cullen Pullen, P. (2016). Historical and current perspectives on learning disabilities in the united states. *Learning Disabilities -- A Contemporary Journal*, 14(1), 25-37.
- Deere, D., Strayer, W., 2001a. Putting schools to the test: school accountability, incentives, and behavior. Private Enterprise Research Center Working Paper 114. Texas A&M University.
- Deere, D., Strayer, W., 2001b. Closing the gap: school incentives and minority test scores in Texas. Texas A&M University mimeo.

- DeMatthews, D. E., & Knight, D. S. (2019). The Texas Special Education Cap: Exploration into the Statewide Delay and Denial of Support to Students with Disabilities. *Education Policy Analysis Archives*, 27(1/2), 1–31. <https://doi.org/10.14507/epaa.27.3380>
- Dempsey, S., & Fuchs, D. (1993). "Flat" versus "weighted" reimbursement formulas: A longitudinal analysis of statewide special education funding practices. *Exceptional Children*, 59(5), 433-43. 10.1177/001440299305900506
- Dhuey, E., & Lipscomb, S. (2013). Funding special education by total district enrollment: Advantages, disadvantages, and policy considerations. *Education Finance and Policy*, 8(3), 316-331. 10.1162/EDFP_a_00098
- Dorn, S., Fuchs, D., & Fuchs, L. S. (1996). A historical perspective on special education reform. *Theory into Practice*, (1), 12.
- Dunn, L. M. (1968). Special education for the mildly retarded: Is much of it justifiable? *Exceptional Children*, 35(1), 5-22.
- Figlio, D. N. (2006). Testing, crime and punishment. *Journal of Public Economics*, 90(4), 837-851. [//doi.org/10.1016/j.jpubeco.2005.01.003](https://doi.org/10.1016/j.jpubeco.2005.01.003)
- Fish, R. E. (2019). Standing Out and Sorting In: Exploring the Role of Racial Composition in Racial Disparities in Special Education. *American Educational Research Journal*, 56(6), 2573–2608. <https://doi.org/10.3102/0002831219847966>
- Fuchs, D., Fuchs, L. S., & Stecker, P. M. (2010). The “Blurring” of special education in a new continuum of general education placements and services. *Exceptional Children*, 76(3), 301-323. 10.1177/001440291007600304

- Fuchs, D., Mock, D., Morgan, P. L. 1., & Young, C. L. 1. (2003). Responsiveness-to-intervention: Definitions, evidence, and implications for the learning disabilities construct. *Learning Disabilities Research & Practice (Wiley-Blackwell)*, 18(3), 157-171. 10.1111/1540-5826.00072
- Gormley, W. T. (1987). Institutional Policy Analysis: A Critical Review. *Journal of Policy Analysis and Management*, 6(2), 153–169. <https://doi.org/10.2307/3324512>
- Greene, J. P., Forster, G., & Manhattan Inst, New York, NY Center for,Civic Innovation. (2002). *Effects of funding incentives on special education enrollment. civic report.*
- Harr-Robins. (2015). *School practices and accountability for students with disabilities: National center for education evaluation and regional assistance: Evaluation reports;2015 ASI 4816-9.43;NCEE 2015-4006.*
- Hays, D. G., & Singh, A. A. (2012). *Qualitative Inquiry in Clinical and Educational Settings.*
- Hays, D. G., & Singh, A. A. (2012). *Qualitative inquiry in clinical and educational settings.* The Guilford Press.
- Hibel, J., Farkas, G., & Morgan, P. L. (2010). *Who is placed into special education?* United States: AMERICAN SOCIOLOGICAL ASSOCIATION.
- Individuals with Disabilities Education Act, 20 U.S.C. § 1400 (2004)
- Interim Report to the 79th Texas Legislature, Committee on Public Education. (2004). Retrieved from <http://www.house.state.tx.us/committees/reports/>
- Keogh, B.K. (2007). Celebrating PL 94-142: The Education of All Handicapped Children Act of 1975. *Issues in Teacher Education*, 16(2), 65–69.

- King, N. (2004). Using templates in the thematic analysis of text. In C. Cassell & G. Symon (Eds.), *Essential guide to qualitative methods in organizational research* (pp. 257–270). London, UK: Sage.
- Kwak, S. (2010). The impact of intergovernmental incentives on student disability rates. *Public Finance Review*, 38(1), 41-73. 10.1177/1091142109358707
- Lincoln, Y.S., & Guba, E.G. (1985) *Naturalistic Inquiry*. Sage Publications.
- Loeb, S., Dynarski, S., McFarland, D., Morris, P., Reardon, S., Reber, S., National Center for Education Evaluation and Regional Assistance (ED), & Decision Information Resources, I. (2017). *Descriptive Analysis in Education: A Guide for Researchers*. NCEE 2017-4023. *National Center for Education Evaluation and Regional Assistance*
- Mahitivanichcha, K., & Parrish, T. (2005). The implications of fiscal incentives on identification rates and placement in special education: Formulas for influencing best practice. *Journal of Education Finance*, (1), 1.
- McLaughlin, M. J., & Owings, M. F. (1992). Relationships among states' fiscal and demographic data and the implementation of P.L. 94–142. *Exceptional Children*, 59(3), 247-261. 10.1177/001440299305900308
- Merriam, S. B. (1998). *Qualitative research and case study applications in education. 2nd ed., rev. and expanded*. Jossey-Bass. Retrieved from <http://search.ebscohost.com.srv-proxy2.library.tamu.edu/login.aspx?direct=true&db=cat03318a&AN=tamug.1644101&site=eds-live>

- Miller, S.I., & Fredricks, M. (2006). Mixed-methods and evaluation research: Trends and issues. *Qualitative Health Research, 16*(4)
- Morgan, P. L., Farkas, G., Hillemeier, M. M., Mattison, R., Maczuga, S., Li, H., & Cook, M. (2015). Minorities are disproportionately underrepresented in special education: Longitudinal evidence across five disability conditions. *Educational Researcher, 44*(5), 278-292. 10.3102/0013189X15591157
- Nowell, L. S., Norris, J. M., White, D. E., & Moules, N. J. (2017). Thematic Analysis: Striving to Meet the Trustworthiness Criteria. *International Journal of Qualitative Methods, 16*, 1-13.
- Noel, M. M., & Fuller, B. C. (1985). The social policy construction of special education: The impact of state characteristics on identification and integration of handicapped children. *Remedial and Special Education, 6*(3), 27-35. 10.1177/074193258500600307
- Oswald, D. P. (2003). Trends in the special education identification rates of boys and girls: A call for research and change. *Exceptionality, 11*(4), 223-237. 10.1207/S15327035EX1104_3
- Parrish, T. B., & Chambers, J. G. (1996). Financing special education. *The Future of Children, 6*(1), 121-138. 10.2307/1602497
- Patton, M. Q. (1987). *How to use qualitative methods in evaluation*. Newbury Park, Calif.: Sage Publications.
- Plummer, K. (2001). The call of life stories in ethnographic research. *Handbook of ethnography, 395-406*.

- Reschly, D.J. & Hosp, J.L. (2004). State SLD Identification Policies and Practices. *Learning Disability Quarterly*, (4), 197. doi:10.2307/1593673
- Rutter, M., & Yule, W. (1975). The concept of specific reading retardation. *Journal of Child Psychology & Psychiatry*, 16(3), 181.
- Rosenthal, B. (2016). Denied: How Texas Keeps Thousands out of Children out of Special Education. *The Houston Chronicle*. Retrieved from <http://www.houstonchronicle.com/denied/1/>
- Scull, J., Winkler, A. M. (2011). *Shifting trends in special education*. Thomas B. Fordham Institute. Retrieved from: <https://eric.ed.gov/?id=ED520416>
- Shapiro, J. P., & Loeb, P. (1993). Separate and unequal. (cover story). *U.S. News & World Report*, 115(23), 46.
- Texas Education Agency. (2021). Annual Report 2021. Retrieved from <https://tea.texas.gov/about-tea/news-and-multimedia/annual-reports/annual-report>
- Texas Education Agency. (2017). Enrollment in Texas Public Schools. Retrieved from https://tea.texas.gov/acctres/enroll_index.html
- Texas Education Agency. (2011). Historical Overview of Assessment in Texas. Retrieved from <https://tea.texas.gov/sites/default/files/digest11-chap01.pdf>
- Texas Education Agency. (2018). Performance-Based Monitoring Analysis Manuals. Retrieved from https://tea.texas.gov/acctres/enroll_index.html

Texas Education Agency. (2018). Special Education Strategic Plan. Retrieved from https://tea.texas.gov/Academics/Special_Student_Populations/Special_Education_SPED/Improving_Special_Education_in_Texas

Texas Education Agency. (n.d.). About Snapshot. Retrieved from <https://rptsvr1.tea.texas.gov/perfreport/snapshot/about.snapshot.html>

United States Department of Education. Institute of Education Sciences, National Center for Education Statistics.

United States Department of Education Letter to Texas Education Commissioner Morath. (2018). Retrieved from <https://tea.texas.gov/sites/default/files/OSEP%20011118.pdf>

Yin, R. K. (2018). *Case study research and applications: Design and methods* (Sixth edition.). SAGE Publications, Inc.