DATE: March 30, 2014

TO: Dr. Thomas Price, Chief Academic Officer

FROM: Andrea Ogonosky, Ph.D., Educational Consultant

SUBJECT: REPORT ON THE AUDIT OF THE DISTRICT RTI PROCESS

RESOURCE PERSON(S): Dr. Robin Perez, Dr. Carol Atwood, Dr. Sally LaRue, Dr. Meaux, Dr. Jamie Bryson, Chandra Elizando, Lesa Pritchard, Chestin Auzenne, Julie Brewer, Ciana Bauer and Melissa Christensen, Alison Pierce, Amanda McGee, Sukari Stredit-Thomas and the Administrators with RtI Team Members on the following Humble ISD Campuses: Lakeland Elementary, Sterling Middle, Jack Fields Elementary, Humble Middle School, Atascocita Springs, Atascocita High, Woodcreek Middle, Summer Creek High, Maplebrook Elementary, Timbers Elementary, Summerwood Elementary, Northbelt Elementary, Humble High, Humble Elementary, Riverwood Middle, Shadow Forest Elementary, Creekwood Middle, Hidden Hollow, Kingwood High River Pines Elementary.

Attachments:

Samples of Individual Campus RtI Problem Solving Processes and Documentation
Response to Intervention Blueprints: District Level Edition Texas Version
Meeting the Needs of Significantly Struggling Learners in High School
An Introduction to Recognition and Response
Summary

The Humble ISD contracted with Dr. Andrea Ogonosky, Independent Educational Consultant, National Speaker and Author on the topic of RtI to provide a comprehensive assessment of the district’s RtI Problem Solving Process. The assessment involved an examination of the overall effectiveness and efficacy of Humble ISD’s current RtI policies, procedures and practices.

Dr. Ogonosky thanks the many individuals who contributed to this review of Humble ISD’s RtI process. Their efforts were critical to the ability to obtain a broad and detailed understanding of the system so that the best possible proposals for improving RtI’s support systems for Humble ISD students.

Dr. Ogonosky thanks Dr. Robin Perez for orchestrating and aiding in scheduling and collection of data. Also Dr. Ogonosky thanks all staff members with whom I met. Their passion for the work they do was evident through their comments and earnest feedback. They work passionately to support all students and ensure Humble ISD serves students with learning and emotional needs in the best possible manner.

Methodology
This review was based on triangulated data from multiple sources to arrive at integrated findings and recommendations related to programs, policies, and practices, and the implications for student outcomes.

Dr. Ogonosky’s review approach was multidimensional. It emphasized the participation of multiple stakeholders, and involved both quantitative and qualitative data collection approaches. Components included:

- Analysis of student outcomes data (campus level) for the years 2010-2013
- Campus system reviews with educators from multiple schools
- Humble ISD district outcome data review for the years 2010-2013, including Special Education data
- Humble ISD Special Education data (Referrals and eligibility by disability condition) for the years 2010-2013.
- Staff interviews on a district selected representative sample of elementary, middle, and high schools
- Team RtI Readiness Perception Surveys
- Staff interviews with Humble ISD district level leadership personnel

Outcomes Analysis
The following data and trends were also reviewed:

- **Student Demographics.** Demographic trends for students with disabilities by a variety of characteristics, including grade/grade level, disability categories, race/ethnicity, English Language Learners, etc.
- **Student Achievement.** Student performance data for students with/without disabilities over time, by grade level, etc. Data aggregated by Dr. Carol Atwood summarizing data trends.
- **District RtI Process Guidelines**
- **Special Education Referral and Eligibility Results**
**Organizational Improvement Review**

**Prepared By Andrea Ogonosky. Ph.D., NCSP, LSSP**

**Document Review**
Documents were reviewed and analyzed for information related to District and school structures, programs, policies and practices. Data and documents reviewed were in the following general categories:

- Quantitative data (assessment systems for data collection reading and math HERSI, HEMI,
- Description of services and activities
- Documents regarding accountability and professional development
- District identified resources available for tiered supports
- District procedures and guides

**Interviews and Campus Visits**
An extensive amount of information was gathered for this audit through interviews with central office and school-based administrators, specialists, teachers, and other school-based personnel.

Dr. Ogonosky collaborated with Dr. Robin Perez and Campus administrators to disseminate a survey to RtI campus teams to receive feedback on perceptions regarding various aspects of a strong RtI system. The survey respondents represented all grade levels.

**Campus Process Studies**
In September-December 2013, Dr. Ogonosky met with 12 elementary, 5 middle, and 4 high schools to conduct interview and study sessions with school-based personnel. Campus RtI plans were reviewed with regard to instruction and intervention process planning for elementary, middle and high school students educated in general education classes who have demonstrated learning difficulties reflected in formative, summative, diagnostic and state assessment data.

**Organization of Report**
Embedded in the report are descriptions of effective Humble ISD policies, procedures, and practices, as well as areas of concern that were used to formulate specific recommendations designed to improve the academic performance and social/emotional outcomes of students, who as a group have lagged behind their very high performing peers. The goal is to assist the Humble ISD in taking a series of actions that are challenging but intended to help produce a world-class education for every Humble ISD student. Overall recommendations with detailed provisions for implementation are provided at the end of the report.

**Summary of Strengths and Weaknesses**

<table>
<thead>
<tr>
<th>Strengths</th>
<th>Weaknesses</th>
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<tbody>
<tr>
<td>Knowledgeable campus administrators appear to be attuned to their schools’ need, and respected by the teachers with whom they work.</td>
<td>Reading and Math Screening and Assessment Systems are questionable in design and not considered efficient in meeting the needs of campus personnel.</td>
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<tr>
<td>Humble ISD personnel are interested in learning pedagogy applicable to content curricular areas to support professional development activities with regard to learning and intervention</td>
<td>There is inconsistent Implementation of a problem solving process across campus settings.</td>
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strategies for at-risk learners.

- Elementary campus teams visited have regularly scheduled RtI team meetings. Scheduling of regular meetings supports monitoring progress and implementation of campus developed RtI plans.

- District data are easily accessible to administrators and teachers. Reflecting this capability, administrators are confident about ease of use of district aggregated data.

- Campus teams indicate strong positive supports are in place regarding behavior intervention.

Overall there was a high regard for Humble ISD providing quality instruction and services to all students as demonstrated through interviews with district staff. Leadership demonstrated cutting edge and innovative ideas for practices regarding differentiated instruction, and the importance of using data based conversations to drive instruction. There was a widespread appreciation for access to data and technical assistance provided by Humble ISD District Central Office personnel.

There was consistent dissatisfaction reported with current assessment systems used to inform focused instruction and RtI intervention plans for struggling learners. Furthermore a review of district developed assessments lead to questionable validity and reliability of instruments due to a lack of evidenced based norming and interpretation of data.

The following charts reflect Humble ISD team survey results (campuses visited) regarding perceptions of the RtI District/campus systems. This aggregated data indicates the following reported perceptions of NASDE Identified RtI indicators:
Measurement Systems

Designated Staff to Monitor Data System

Progress Monitoring

Data use

Data Collection

Universal Screening

1 = Not in place
2 = Partially in place
3 = Fully in place

Curriculum and Instruction

Fidelity Plan

Flexible Grouping

Writing Instruction

Core Literacy Curriculum

1 = Not in place
2 = Partially in place
3 = Fully in place
School Wide Organization RtI

- PD C & I
- Resources Allocated
- Data Warehouse
- Identified Resources Tier 2,3
- Instructional Leadership

Problem Solving Team Support

- Procedures in Place
- Regular Meetings
- Administrator on Team
- Balanced Representation of Team Members
- Viewed as Gen Ed
- Identified Campus RtI Team

Legend:
1 = Not in place
2 = Partially in place
3 = Fully in place
Based upon campus visits, review of individual processes and team interviews the following information is shared regarding the foundation of RtI problem solving (assessment). It is important to note that Humble ISD personnel collect large amounts of data on students, yet feel that there is a significant need for increasing staff understanding of the appropriate use and interpretation of the data.

<table>
<thead>
<tr>
<th>Guiding Questions</th>
<th>Emerging: Establishing Consensus</th>
<th>Developing: Building Infrastructure</th>
<th>Operationalizing: Gaining Consistency</th>
<th>Optimizing: Innovating and Sustaining</th>
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<tbody>
<tr>
<td>How are 4 purposes of assessments understood and used by staff?</td>
<td>School staff collaboratively know the 4 assessment purposes of an RtI system.</td>
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<tr>
<td>How is a decision-making protocol created for the staff?</td>
<td>School leadership uses an outline of a decision-making protocol.</td>
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<td></td>
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<tr>
<td>How is data managed and accessed?</td>
<td></td>
<td>Campus staff and teams effectively use district data management</td>
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</table>
How is assessment data used to drive instructional practices for both groups and individual students?

School leadership and staff are committed to using student-centered data and teams are formed for the purpose of problem solving and using the data to improve instruction and interventions.

How are families and students involved with the problem solving process?

School leadership includes students and families in the assessment process by use of communication, sharing results.

How is PD provided to support an effective, sustainable student-centered assessment system?

Staff engage in job embedded PD on assessment tools, use of results to improve instruction, using multiple sources of data.

Additional Information provided through campus interviews includes the following:

<table>
<thead>
<tr>
<th>Strengths</th>
<th>Needs</th>
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<tbody>
<tr>
<td>Elementary</td>
<td>Ability to use a continuum of resources.</td>
</tr>
<tr>
<td>✓ Great resources available.</td>
<td>✓ Terminology (RtI) is often confusing and inconsistent across campuses.</td>
</tr>
<tr>
<td>✓ Strong ALT’s and support staff on campuses.</td>
<td>✓ There is a lack of ability to use some resources since they are designed for “Special Ed”.</td>
</tr>
<tr>
<td>✓ Supported by SPED (Behavior).</td>
<td>✓ Better assessment tools are needed that are less cumbersome and yield poor results.</td>
</tr>
<tr>
<td>✓ Campus staff believe strong conversations are happening linking data to instructional practices.</td>
<td></td>
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<tr>
<td>Middle School</td>
<td>High School</td>
</tr>
<tr>
<td>--------------</td>
<td>-------------</td>
</tr>
<tr>
<td>✓ Use of Eduphoria for identification of subgroups in need of supports as well as housing campus based assessments.</td>
<td>✓ Additional funding for staffing concerns.</td>
</tr>
<tr>
<td>✓ Strong pyramid of interventions are available.</td>
<td>✓ Continued support from Special Education in PBIS.</td>
</tr>
<tr>
<td>✓ District supports creative uses of schedules and busing options for after school tutorials.</td>
<td>✓ Ideas for dealing with mobility of subpopulations in some of the schools. Time is biggest barrier- figuring out how to increase efficacy of use of time.</td>
</tr>
<tr>
<td>✓ Strong teacher student relationships. Good supports offered by counselors and ALT’s.</td>
<td>✓ Consistency of documentation of interventions tried so intervention can continue as student’s transition to middle school.</td>
</tr>
<tr>
<td>✓ Administrator’s report a positive response to designed DIP and CIP processes.</td>
<td>✓ Additional staff development on RtI.</td>
</tr>
<tr>
<td>✓ Good use of Aware and data aggregation system.</td>
<td>✓ Staff training on RtI.</td>
</tr>
<tr>
<td>✓ Staff training on differentiated</td>
<td></td>
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Strong support from Central office.
- Ease of scheduling aligned to EOC data.
- Understanding of alignment of all student support services.
- Consistency of information documented and interventions tried so intervention can continue as student’s transition to high school.

**Special Education Eligibility Trends 2009-2013**

Districts using data based problem solving systems will demonstrate a decreased in special education eligibility due to increased student outcomes.

**During the staff meeting with SPED personnel it was reported that of the 551 referrals for assessment for eligibility consideration (2011-2012) **21% did not qualify.**

Special Education staff report the following concerns regarding Humble ISD RtI process: Data collected is not consistently reported quantitatively or in context of access to instruction when a referral to special education assessment is made. Another concern is noted: staff skill and understanding of the process of RtI as it relates to general education interventions and instruction is lacking district-wide. A common concern was also noted regarding the variance of the implementation of an RtI process in Humble ISD causes issues with fidelity of implementation and results in loss of instructional time.
Using an effective Problem solving system (RtI) also yields data that shows trends in increasing achievement scores as measured by district and state-wide assessments for all students. Overall the data trends analyzed over 3 years indicates Humble ISD is showing some student growth for their students, however identified at-risk populations and learners (i.e. title schools, special education students, second language learners) do not reflect upward trends in closing foundational gaps and increasing outcome scores for reading and math.

Humble ISD has a strong process for aiding administrators for decision making regarding staffing and resource allocations using budget allocations wisely. District leadership demonstrates fiscal responsibility and appropriate use of staff for instructional supports. It is important to note that campus administrators interviewed all report the need for additional staff and resources to continue improving and meeting the needs of their students.

Key Findings and Recommendations

The below chart highlights the key findings and high level action steps for Humble ISD, organized by topic area. Detailed recommendations are provided to address the relevant concerns. Each of these recommendations includes specific action steps.

### SUMMARY OF KEY FINDINGS AND PROPOSED ACTION STEPS

<table>
<thead>
<tr>
<th>Topic Area</th>
<th>Key Findings</th>
<th>Action Steps</th>
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<tr>
<td>RtI</td>
<td>- Humble ISD does not have a comprehensive guidance document that provides local operating standards for the implementation of RtI. Additionally, language used in model currently in place is not consistent with state and federal models for a comprehensive RtI framework. &lt;br&gt; - Recognizing the importance of core curriculum, Humble ISD has a focus on effective “first teach” instruction. However based upon campus visits and survey results, staff expresses a need for professional development in implementation of strong Tier 1 “first teach” differentiated strategies. &lt;br&gt; - Special Education staff is routinely excluded from the RtI problem solving process on campuses.</td>
<td>- Build on current elements in place to develop/implement a framework of multi-tiered system of supports for academic achievement, positive behavior, and social/emotional growth aligned to TEA guidance. &lt;br&gt; - Develop a series of PD trainings aligning Tier 1 differentiated strategies and student learner strategies to support a strong “first teach” approach to students with learning and emotional difficulties. &lt;br&gt; - District guidance and training is needed on understanding</td>
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• Campus staff reported much variability regarding the extent to which students with IEPs could participate in RtI interventions with students without IEPs.

• Schools use various, but inconsistent, methods for maintaining academic and behavior data for students.

• There was a strong consensus that there is a lack of an accountability paradigm for educating at-risk students within a 3 tier problem solving process, and that the charge must come from the district central office leadership (district level RtI Committee overseeing fidelity of implementation).

• Concerns were expressed that principal walkthrough protocols were not sufficiently specific to assess the extent to which students within the RtI process are effectively educated in general education classes as well as within the tiered supplemental services.

• Schools with access to additional resources (i.e. Title schools) are perceived to have an advantage to RtI implementation and practices. This perception is used as an excuse for implementation difficulties on campus not receiving these funds.

• Administrators repeatedly reported dissatisfaction with current district professional development and support regarding implementation and sustainability of the RtI process in Humble ISD.

• Administrators perceive the initial roll out of RtI too cumbersome due to documentation policies and assessment expectations. Current administrators continue to express concern about the initial roll out of process while also demonstrating incorrect perceptions of the Response to Intervention process.

Planning, Professional Learning & Accountability

• Establish consistent expectations on the use of vertically aligned data sources that are evidenced based and reliable and valid for the intended purpose of the assessment.

• Designate a central office staff member to oversee implementation of RtI. Also appoint a district level RtI committee to support district efforts.

• Conduct district wide data and feedback to develop a strong horizontal and vertical alignment process.

• Develop a fidelity protocol for administrators to use with walk throughs.

• Provide PD on innovative practices of utilizing current staff and resources differently to improve student outcomes.

• District central office presents a cohesive philosophy of integrating all departments and unite in expectations for a seamless system of supports.
RECOMMENDATIONS

**The Humble ISD RTI Process.** Build on current elements in place to develop/implement a framework of multi-system of supports for academic achievement, positive behavior, and social/emotional growth for all students. Develop a comprehensive, consistent, system-wide plan that integrates student support services, special education services, and other services to better meet students’ needs. To the maximum extent possible, integrate processes for academic, social/emotional, and positive behavior support so that the whole child is considered for support.

a. **Framework.** Establish a Humble ISD district policy and comprehensive framework for the implementation of RtI, including a written description and clear standards, for all students (including those who have IEPs/504 plans, who are gifted/talented or are English language learners) in prekindergarten through 12th grade. Embed implementation of and professional learning for the Texas State Standards within the RtI framework.

**RtI Guidelines.** Use the published comprehensive NASDE and TEA RtI Guidelines to establish and describe written expectations for the following seven essential components and relevant documentation to support fidelity of RtI implementation:

- Universal screening, including tools for its consistent use.
- Problem-solving/decision-making practices.
- Tiered levels of implementation of high-quality instruction/intervention (based on a foundation of first learning), including involvement of students with 504 plans and IEPs and their interaction with nondisabled students for interventions.
- Progress monitoring, including reliable, valid and consistent tools for its use.
- Fidelity of implementation, including documentation that interventions are appropriate for students’ areas of need and were provided as intended.
- Family involvement.
- Considerations for English Language Learners (ELLs).

a. **Instructional Leadership Teams.** Have district-wide and school-based Instructional Leadership Teams for problem-solving and data-based decision making at all tiers to match instructional (academic and behavior) resources to student needs and support academic advancement and positive behavior; and supplement teams as needed to support teachers.

b. **RtI Use for Referral/Eligibility for Specially Designed Instruction.** Clarify standards for the use of RtI as a basis for referring students for special education evaluations, using the NASE and TEA RtI Guidance documents described above. Use RtI results as part of the process for determining the existence of a specific learning disability, and any other disability areas allowable through local criteria.

**LEADERSHIP, PLANNING, PROFESSIONAL LEARNING & ACCOUNTABILITY.** Charge a central office leader with oversight responsibility for the development/implementation of RtI; and develop a district level team to aid in accountability and oversight. As the academic team’s direct support, the central office leader is able to bring together all departmental entities and school leaders necessary to plan and implement these initiatives. Although operations and communications are also components that are important for success, viewing these initiatives as a major educational focus for the District and
garnering the academic team’s resources is essential.

a. **Planning Process.** Develop an implementation plan that is based on input from individuals representing every educational unit (e.g., assistant superintendents, special education and student support services, curriculum and instruction, Title I, ESL, gifted/talented, etc.), schools, and the community. Based on the various components and focus of the plan under discussion, bring together Humble ISD administrators, teachers and other stakeholders with expertise, as well as other relevant personnel responsible for, e.g., finances, operations, and communications, to develop a three-year overall plan that would carry out the district’s expectations.

b. **Timeframe.** Develop an expedited two-to-three year overall district-wide plan with phased in components for implementation.

c. **Map of Current Resources, Gaps & Needs.** Map current evidence-based universal screening tools, progress monitoring tools, interventions, other school-based material (e.g., assistive technology) and human resources, etc., and any gaps between those and what each school would need to give every student access to evidence-based multi-tiered interventions that would meet their academic and social/emotional, and positive behavior needs. As stated in the NASDE’s RtI Guidance: “Ensure that the necessary resources are available for the implementation of the response to intervention practices. Resources should include financial support for program implementation, professional development, methods to assess fidelity, and appropriate human resources. Ensure that these interventions include those appropriate for all subgroups of students.”

   a. **Assessment of Student Progress.** As part of the above mapping process, review the tools currently in use to assess the extent to which students are benefitting from RtI and specially designed instruction/related services and establish expectations regarding regular collection, and problem solving.

   b. **Data.** Address ways in which the various data components included in these recommendations and the state performance indicators for special education will be collected and assessed as part of Humble ISD’s system of accountability to RtI.

   c. **Professional Learning.** Based on the expectations for RtI implementation that require professional learning for effective implementation, plan a differentiated professional learning program for all affected educators, paraeducators, assistants, etc. Infuse the revised framework into ongoing, job-embedded training including new staff:

      i. **TEA Standards.** Have the professional learning activities be consistent with TEA standards for RtI implementation.

      ii. **Toolkits.** Through a web-based instructional toolkit, include: all aspects of RtI, including models/examples for the master schedules to support implementation; inclusive education, and evidence-based focused instruction; collaboration and co-planning; progress monitoring; research showing the benefits of inclusive instruction; etc. Include in the toolkits videos, webinars, and facilitate WebEx meetings to maximize communication and collaboration.

      iii. **Intervention Models & Scheduling.** Identify schools that have developed effective schedules for: RtI implementation and for most students with RtI plans, 504 plans, IEP’s (including those with more complex needs) who are educated effectively in general education classes; and scheduled time for
general/special educators, related services personnel, and paraeducators/assistants to collaborate and co-plan. With staff from these schools, develop processes that may be replicated or improved by other schools.

iv. **Cross-Functional Training.** Initiate cross-function training of administrators and other school support groups from every educational division to expand their knowledge and ability to support school-based personnel.

v. **Mandated Training.** Consider mandating training and other approaches if necessary to ensure that staff members needing professional development receive it for specific purposes.

vi. **Instructional Support Specialists/Paraprofessionals.** Mandate professional learning for paraprofessionals/assistants and provide it in a differentiated and targeted manner for the personnel and students for whom they are responsible, and determine how the training will be offered to enable the instructional specialists and paraprofessionals to attend

d. **Interschool Collaboration.** Establish ways for school personnel to share across schools their successful practices and to problem-solve solutions, including the identification of demonstration schools of excellence, use of exemplary school-based personnel to include as trainers, informal common time for guided discussion, and communicating.

e. **Principals/RtI Chairperson Training & Discussion.** Consider establishing opportunities throughout the year for principals and their campus RtI leaders to meet by grade level with district level RtI committee members to discuss and address issues of concerns and receive information relevant to their responsibilities for RtI problem solving.

f. **Parent Involvement.** With parent stakeholder and representative groups, consider how training will be made available for families/caregivers to reinforce activities that will support the learning, social/emotional skills, and positive behavior of their children.

g. **Communication & Feedback.** Establish timely communication/feedback processes to share solutions to implementation barriers. Several problem areas are likely to require targeted groups of knowledgeable people to resolve issues as they arise. For example, schools often have difficulty providing services with existing staff and would benefit from feedback from individuals able to analyze the situation, and give meaningful suggestions for instruction and use of staff.

h. **Expectations.** Establish, communicate, support, and monitor clear written expectations and “non-negotiables,” establishing clear lines of accountability and responsibility across departments and schools, aligning them with relevant standards and guidance. Incorporate the expectations into administrator, principal, teacher, paraeducator, and related-service personnel evaluations.

i. **Walk Through Protocols.** Ensure that school walk-through protocols include sufficient provisions to observe and address relevant RtI elements.
This Report is Respectfully Submitted by:

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Andrea Ogonosky, Ph.D., LSSP, NCSP
Licensed Psychologist / Educational Consultant