P K Yonge

Developmental Research School
at the University of Florida

Multi-tiered System of Supports

Table of Contents

Introduction

The purpose of this manual is to assist with P.K. Yonge's implementation of data-based decision making in a systematic problem-solving process at all levels of operation: district level, school level, learning community level, grade level, classroom level, student subgroup level, and individual student level. This manual aligns directly with Florida's overall implementation of problem solving and response to instruction/intervention (PS-RtI). This manual sets the stage for P.K. Yonge to approach instructional decisions from a broader context of quality assessment, instruction, and intervention to address the learning and behavioral needs of all students.

This manual also addresses ways to assess whether core curricula, instruction, and interventions are effective and, in turn, use such data in various decision-making processes for students. Decisions about the effectiveness of core instruction and interventions must be made for all students. Therefore, it is important that school leadership teams take an active role in examining curricular materials, instructional methodologies, the learning environment, and other practices across school settings to determine their effectiveness and assess their impact on academic and behavioral student learning.

The mission of the State Board of Education, as stated in section 1008.31, Florida Statutes (F.S.), is to increase the proficiency of all Florida students within one seamless, efficient system by providing them with the opportunity to expand their knowledge and skills through learning opportunities and research valued by students, parents, and communities to maintain an accountability system that measures student progress toward the following goals:

- Highest student achievement

- Seamless articulation and maximum access

- Skilled workforce and economic development

- Quality, efficient services

Ultimately, the role of the Florida education system is to prepare every student for life beyond formal schooling. To this end, it is the position of the Florida Department of Education that the problem-solving and response to instruction/intervention (PS-RtI) framework represents a logic and set of core beliefs, including the systematic use of a problem-solving process, that must be integrated seamlessly into educational initiatives throughout Florida. Ideally, this integration should be evident within school improvement efforts, student progression plans, and the development and implementation of K–12 Comprehensive Reading Plans to provide the legal structure for the implementation of PS-RtI in districts and schools across the state.

Florida's Statewide PS-RtI Plan was disseminated in 2008 and is accessible at Florida's RtI website (http://www.florida-rti.org/flMod/fits.htm). The plan outlines a framework for statewide implementation of PS-RtI through the establishment of an infrastructure that includes district-based leadership teams (DBLT) implementing district-based plans to support school-based leadership teams (SBLT) implementing school-based plans. As stated in Florida's Statewide PS-RtI Plan (2008) "…all schools in Florida should ensure evidence-based practices, instructionally relevant

assessments, systematic problem-solving to meet all students' needs, data-based decision making, effective professional development, supportive leadership, and meaningful student and parent involvement. These are the foundational principles of an RtI system, which provides us the framework to elevate the efficacy of our statewide improvement efforts."

Florida's plan defines RtI as the practice of providing (1) high-quality instruction/intervention matched to student needs and (2) using learning rate over time and level of performance to (3) make important educational decisions. PS-RtI is an ongoing process of using student performance and related data to guide instructional decisions and intervention decisions for all students. It is a multi-tiered, problem-solving model of prevention, early intervention, and use of educational resources to address student needs. PS-RtI matches instructional strategies and supports to student need in an informed, ongoing approach for planning, implementing, and evaluating the effectiveness of the curriculum, the instruction, and related supports.

It is imperative to consider specific types of decisions for students, such as eligibility for special education services, in the larger context of the system-wide PS-RtI implementation. More important than its role in making eligibility decisions, PS-RtI is about creating and sustaining learning environments that are effective and lead to desired outcomes for all students. Consequently, the PS-RtI framework outlined in this manual has a significant impact on instruction and assessment practices at P.K. Yonge Developmental Research School.

Federal funding sources are used to supplement P.K. Yonge's FEFP operating budget to enhance our multi-tiered systems of support. P.K. Yonge's Title I, Part A targeted assistance program supports Tier 2 and Tier 3 instructional support in reading at kindergarten through third grades. Additional Title I, Part A funding is used to support our summer reading intervention program for kindergarten through second grade students (SAIL: Summer Adventures in Literacy). P.K. Yonge's IDEA funding supports instructional intervention teachers who provide targeted Tier 3 instruction for students with disabilities in 4th through 12th grades. In addition, IDEA funds support P.K. Yonge's school psychologists, speech and language services, and occupational therapy.

Ultimately, this manual provides P.K. Yonge Developmental Research School with detailed information on the process for the collection of student performance data through the school wide implementation of the PS-RtI framework and delineates how those data can be used to assist with making important educational decisions for all of P.K. Yonge's students.

Section 1 - RtI

Guiding Principles:
Meeting the Needs of All of our Students

A Multi-Tiered System of Supports ("MTSS") and all of its related components (data-based problem solving ("PS")) increases the quality of the educational experience for ALL students. The framework includes effective core (tier 1) academic and behavioral supports and additional help for children who need it. Therefore, the effectiveness of instruction for all students is the constant priority within an MTSS.

MTSS is a more accurate term to refer to the framework of educational services than the term Response to Instruction/Intervention ("RTI") (which has historically been used to refer to the framework). An MTSS reflects a seamless system wherein multiple levels of academic and behavioral supports are provided to students based on student need. RtI is a central step of the problem-solving process. Problem solving is a key practice within an MTSS.

Purpose of Response to Intervention (RtI)

In June of 2008, the FDOE published a *Response to Instruction/Intervention (RtI) Implementation Plan* that provided the initial, formal, state-level framework to assist Florida school districts and schools with critical components, definitions, and applications to support the development of school-wide PS-RtI implementation. The plan is accessible at Florida's Response to Instruction/Intervention website at http://www.floridarti.org/flMod/fits.htm. The publication of the statewide implementation plan marked a significant point in Florida's development, reflecting a state-level, collective intent to engage in large-scale systems change.

Since 2004, Florida has engaged in continuous efforts to determine how systematic problem solving and the RtI framework integrate the various elements of Florida's education system and how the PS-RtI logic affects resource allocation and access through the federal Individuals with Disabilities Education Act (IDEA). As elements of Florida's system continue to grow and change, it is important that we continue to examine how PS-RtI logic affects Florida's system as a whole, rather than applying procedures in isolation.

This manual illustrates the comprehensive way in which PS-RtI is universally applied to decision-making in Florida, including, *but not limited to*, decisions related to eligibility for special education services and supports. Its purpose is to:

- Guide the application of school-wide problem solving within anRtI framework as a school-wide improvement model

- Provide the school with the practical decision-making tools that maintain the integrity of the problem-solving process within anRtI framework

- Reinforce the purpose of effective instructional decision-making to improve the effects of instruction for all students while acknowledging its role in evaluation and eligibility decisions related to special education services.

Foundational Beliefs

Florida educators involved in the systematic PS-RtI implementation share the following beliefs about the ideal educational conditions for promoting student achievement. Using the following beliefs to guide P.K. Yonge's efforts is one way to ensure consistent movement toward maximizing student achievement:

1. Highly effective personnel deliver scientific, research-based instruction and evidence-based practices.
2. Curriculum and instructional approaches have a high probability of success for most students.
3. Instruction is differentiated to meet individual learning needs.
4. Reliable, valid, and instructionally relevant assessments include the following:

   - Screening Measures: Assessment tools designed to collect data for the purpose of measuring the effectiveness of core instruction and identifying students needing more intensive interventions and support
   - Diagnostic Measures: Formal or informal assessment tools that measure skill strengths and weaknesses, identify skills in need of improvement, and assist in determining why a problem is occurring
   - Progress Monitoring Measures: Ongoing assessment conducted for the purposes of guiding instruction, monitoring student progress, and evaluating instruction/intervention effectiveness
   - Formative Measures: Ongoing assessment embedded within effective teaching to guide instructional decisions
   - Summative (Outcome) Measures: Typically administered near the end of the school year to give an overall perspective of the effectiveness of the instructional program

5. Ongoing, systematic problem solving is consistently used, from enrollment to graduation for all students, to make decisions across a continuum of student needs.
6. Student data are used to guide meaningful decision-making.
7. Professional development and follow-up coaching with modeling are provided to ensure effective instruction at all levels.
8. Actively engaged administrative leadership for data-based decision making is inherent to the school culture.
9. All students and their parent(s) are part of one proactive and seamless educational system.

Problem Solving and Response to Instruction/Intervention Framework

PS-RtI is consistently defined in Florida as the practice of providing high-quality instruction and intervention matched to student needs using learning rate over time and level of performance to make important instructional decisions. PS-RtI involves the systematic use of assessment data to most efficiently allocate resources in order to improve learning for all students. To ensure efficient use of resources, schools begin with the identification of trends and patterns using school-wide and grade-level data. Students who need instructional intervention beyond what is provided universally for positive behavior or academic content areas are provided with targeted, supplemental interventions delivered individually or in small groups at increasing levels of intensity.

The RtI framework is characterized by a continuum of academic and behavioral supports reflecting the need for students to have fluid access to instruction of varying intensity levels. Three tiers describe the level and intensity of the instruction/interventions provided across the continuum. The three tiers are not, conversely, used to describe categories of students or specific instructional programs. The three tiers are characterized as follows:

Tier 1: Core Universal Instruction and Supports – General academic and behavior instruction and support designed and differentiated for all students in all settings

Tier 2: Targeted Supplemental Interventions and Supports – More focused, targeted instruction/intervention and supplemental support *in addition to and aligned with the core academic and behavior curriculum and instruction*

Tier 3: Intensive Individualized Interventions and Supports – The most intense (increased time, narrowed focus, reduced group size) instruction and intervention based upon individual student need provided *in addition to and aligned with core and supplemental academic and behavior, curriculum, instruction, and supports*

The problem-solving (PS) process is critical to making the instructional adjustments needed for continual improvement in both student level of performance and rate of progress and is critical for assessing (through student's response) the effectiveness of the instruction/interventions provided. Throughout the continuum of instruction and intervention, problem-solving is used to match instructional resources to educational need. *Teams continue to engage in problem solving to ensure that student success is achieved and maintained.*

The four critical parts of the on-going problem-solving cycle as a consistent way of work for PS teams are as follows:

I. Define the need by determining the difference between what is expected and what is occurring. Ask, "What specifically do we want students to know and be able to do when compared to what they do know and are able to do?" When engaged in problem solving at the individual student level, the team should strive for accuracy by asking, "What exactly is the need?"

II. Analyze the need using data to determine how to respond. Gather assessment data to determine valid/non valid hypotheses. Link validated hypotheses to responses/intervention so that hypotheses will lead to evidence-based decisions. Ask, "Why is/are the desired goal(s) not being met? What are the barriers to the student(s) doing and knowing what is expected?" Design or select a response to directly address those barriers.

III. Develop and implement a plan driven by the results of the team's analysis by establishing a performance goal for the group of students or the individual student and developing an intervention plan to achieve the goal. Then delineate how the student's or group of students' progress will be monitored and implementation integrity will be supported. Ask, "What are we going to do?"

IV. Measure response to instruction/interventions by using data gathered from progress monitoring at agreed upon intervals to evaluate the effectiveness of the intervention plan based on the student's or group of students' response to the intervention. Progress-monitoring data should

directly reflect the targeted skill(s). Ask, "Is it working? If not, how will the instruction/intervention plan be adjusted to better support the student's or group of students' progress?" Team discussion centers on how to maintain or better enable learning for the student(s).

For an illustration of the multi-tiered framework, the problem-solving cycle, and considerations for progress monitoring at each tier, see Figure 1 – Progress Monitoring within Florida's Problem-Solving and Response to Instruction/Intervention Framework.

Figure 1

Progress Monitoring within PKY's Problem-Solving and Response to Instruction/Intervention Framework

Intensive, Individualized Monitoring

- Intensive interventions based on individual student needs
- Students receiving prolonged interventions at this level may be several grade levels behind or above the one in which they are enrolled
- Progress monitoring occurs most often to ensure maximum acceleration of student progress
- If more than approximately 5% of students are receiving support at this level, engage in tier one and tier two level systemic problem solving

Few

Some

Evaluate
Is is working?

Determine
What is the need?

Implement
What are we going to do about it?

Analyze
Why is it occuring?

All

Targeted, Supplemental Monitoring

- Interventions are based on data revealing that students need more than core, universal instruction
- Interventions and progress monitoring are targeted to specific skills to remediate or ensure that the intervention is working
- If more than approximately 15% of students are receiving support at this level, engage in tier one level, systemic problem solving

Core, Universal Monitoring

- Research-based, high-quality, general education instruction and support
- Screening and benchmark assessments for all students
- Assessments occur for all students
- Data collection continues to inform instruction
- If less than approximately 80% of students are successful given core, universal instruction, engage in Tier 1 level problem solving

The application of the problem-solving cycle across the three tiers is an essential component of a functional PS-RtI system. The underpinning idea is that the level of support a student needs to be successful exists on a continuum. The continuum includes students needing no support beyond the differentiated core curriculum and instruction to those needing extraordinary support. Tiered resources are arranged along that continuum such that students have access to instruction/intervention at a level of intensity commensurate with their needs. For this tiered arrangement of resources to result in maximum student outcomes, instruction within each tier must be effective for large numbers of students.

When this is not the case, the four steps of the problem-solving process are applied to facilitate decision-making to improve the effectiveness of the instruction/intervention delivered. For example, if the third grade core package of services delivered in math results in only 50 percent of the students meeting grade-level benchmarks, the four problem-solving steps are implemented with a focus on Tier 1 so that the team may (1) identify the discrepancy between what the students are able to do and what we want them to do, (2) generate hypotheses as to why that discrepancy exists, (3) link data-verified instructional changes to those hypotheses, and (4) measure student(s) response to the adjusted instruction. The same process is applied at subsequent tiers if the measured level of effectiveness of the services provided at that tier does not meet expectation. See Table 1 – Imperative Questions, which includes important questions for teams to address in order to guide discussions about the effectiveness of instruction at each tier.

The effectiveness of each tier of instruction must be monitored to ensure the strength of the entire system. The problem-solving process is a recursive, self-correcting, ongoing methodology used for effective decision-making at all levels within the system. This logic and theme of data-based decision-making is embedded in a variety of existing structures such as school improvement, student progression, reading plans, positive behavior support, the continuous improvement model, and school policies and procedures.

Table 1
Imperative Questions

Imperative questions to ask while engaging in problem-solving at the core, supplemental, and intensive levels include:

Tier 1: Core Instruction and Universal Supports	Are students provided with well-delivered, scientific, research-based core instruction? How is this verified?
	What assessment tools or processes are used to identify instructional needs and the students' response to instruction?
	Is the core instruction/support effective? • What percent of students are achieving standards/benchmarks/behavioral expectations (approximately 80 percent or more)? • What percent of students in subgroups are achieving standards/benchmarks/behavioral expectations (approximately 80 percent or more)? • If addressing an individual student's needs what percent of students in his/her subgroup are achieving benchmarks/standards/behavioral expectations (approximately80 percent)?
	If core instruction is not effective, • Is the curriculum appropriately matched to the needs of the students? • Is support provided for implementation fidelity?
	To what extent is the school-based leadership team engaged in Tier 1-level problem solving in order to increase the effectiveness of core instruction/behavioral supports?
	How are parents and students involved or engaged in supporting effective core instruction/behavioral supports?
	What is the decision rule to determine if student(s) will require supplemental and more intensive, individualized intervention/support?

Table 1
Imperative Questions (continued)

Tier 2: Supplemental Interventions and Supports	What specific supplemental intervention/ support is planned to improve the performance of students who need additional instruction and support (more academic-engaged time, more focused intervention, smaller group, type of delivery, methodology, in addition to and aligned with core instruction, etc.)? Consider at least six pieces of information: • Amount of additional time • Focus of the intervention and support • Specific instructional strategies/behavioral support • Method and frequency of progress-monitoring assessments • Evidence of fidelity • Sufficiency of intervention/support
	How is the supplemental intervention implemented? • Academic-Engaged Time – How much more time is provided? • Curriculum – What is used? • Personnel – Who, when, and where is it provided? Are the highest levels of instructional expertise and skill matched to the students with the most significant needs? How is support provided to ensure fidelity of implementation? • Parents – How are the student's parents involved or engaged in supporting the interventions?
	How effective is the supplemental instruction for groups of students who need additional instruction and support? • What assessments are used for ongoing data collection aligned with core instruction? • How frequently are assessments conducted? How frequently are they analyzed by the team? • How are the student's parents engaged in the progress monitoring and analysis of level of performance and rate of

	progress? • How does the team determine whether the instruction/intervention is effective? • If the intervention is ineffective (poor or questionable student response), how does the team monitor and support implementation fidelity? • What is the decision rule to determine if student(s) will require more intensive, individualized intervention/support?

Tier 3: **Intensive Individualized Intervention and Support**	What specific intensive, individualized intervention is planned to improve the level of performance and the rate of progress of the individual student (e.g., more academic-engaged time, more focused intervention, smaller group, type of delivery, methodology, in addition to and aligned with core/supplemental instruction)? Consider at least six pieces of information: • Amount of additional time • Focus of the instruction/intervention • Specific instructional/behavioral strategies • Evidence of fidelity • Sufficiency of instruction/support • Method and frequency of progress-monitoring assessments
	How is the intensive, individualized intervention delivered? • Academic-Engaged Time – How much more time is needed? • Curriculum – What does the student need? • Personnel – Who, when, and where is it provided? Are the highest levels of instructional expertise and skill being matched to the students with the most significant needs? How is support provided to ensure fidelity of implementation? • Parents – How are the student's parents involved or engaged in supporting interventions to increase the students' level of performance and rate of progress?

	How effective is the intensive, individualized intervention for the student? • What assessments are used for ongoing data collection? • How frequently are assessments conducted? How frequently are they analyzed by the team? • How, and to what degree, are the student's parents involved or engaged in the progress monitoring and analysis of the student's level of performance and rate of progress? • How unique is the student's response in comparison to peers? • How do teams determine whether the intervention is effective? • What is the decision rule to determine any necessary adjustments to the instruction/interventions? • If the intervention is ineffective (poor or questionable student response), how does the team monitor and support implementation fidelity?

Section 2 - RtI

Making Connections: Aligning Practices, Efforts, Commitments, and Initiatives

"Begin with the idea that the purpose of the system is student achievement, acknowledge that student needs exist on a continuum rather than in typological groupings, and organize resources to make educational resources available in direct proportion to student need."

David Tilly, Director, Innovation and Accountability,
Heartland Area Education Agency

The FDOE and Florida districts and schools throughout the state share the goal and responsibility of increasing the proficiency of all students within one seamless, efficient system (section 1008.31, F.S.). An efficient and effective public education system is fundamental to Florida's ability to make significant social and economic contributions in our national and global marketplace. Evidence of a national emphasis on reforming public education to prepare students to be competitive in the 21st century global economy is found in federal legislation such as the Elementary and Secondary Education Act ("ESEA") of 2002 and the Individuals with Disabilities Education Act of 2004.

Data-based decision-making, the use of evidence-based practices, and accountability for student performance are also embedded in important federal legislation that impacts education. Congress authorized the ESEA of 2002 to hold schools accountable for the educational outcomes of students. ESEA requires states to ensure that all students, including those who are disadvantaged, achieve predetermined levels of academic proficiency as determined through statewide assessments. Implementation of evidence-based instructional practices is mandated to increase the percentage of students who demonstrate proficiency on statewide assessments. Similar to ESEA, the IDEA focuses on the use of data and research-based practices in the selection of curriculum and pedagogy. Schools must make decisions regarding how to respond to these mandates using all of the available educational expertise by blending resources and unifying efforts within PS-RtI implementation.

The RtI framework is the practice of providing high-quality instruction/intervention matched to student needs and using data over time (learning rate over time and level of performance) to make important educational decisions. It is the position of the FDOE that this practice represents a logic and set of core beliefs, including the systematic use of a problem-solving process that must be integrated seamlessly into school improvement plans, student progression plans, K-12 comprehensive reading plans, differentiated accountability plans, etc. This problem-solving process must be applied to all learners, which includes general education students from pre-k through graduation, students with disabilities, and advanced and gifted learners, in order to elevate the efficacy of statewide improvement efforts and processes.

The PS-RtI framework supports the implementation of FDOE requirements and can be a catalyst for student learning by supporting the implementation of services to improve the academic

and behavioral performance of all students, including students at risk for educational failure. The framework also becomes a catalyst for adult learning through embedded professional development.

Important education practices, such as Lesson Study, which is an ongoing professional development process used within Professional Learning Communities (PLCs) to allow teachers the opportunity to create a model for high quality instructional practices, contribute to this framework by matching the method of quality instruction to students' needs. Information about the Lesson Study approach can be found at: http://www.flbsi.org/pdf/Lesson%20Study%20TAG_Final.pdf.

Other examples of how various initiatives are connected to PS-RtI, such as Florida's reading initiatives, the Next Generation PreK-20 Education Strategic Plan, and the State Performance Plan, are as follows:

The PS-RtI framework supports Florida's reading initiatives by:

1. Collaborating with Just Read, Florida! (JRF) and the Florida Center for Reading Research (FCRR) to increase the number of schools using problem-solving, data-based decision making at early grades to prevent reading failure
1. Including PS-RtI components in district K–12 Comprehensive Reading Plans
2. Increasing the number of early grade interventions to facilitate early identification and intervention for students at risk for reading failure
3. Decreasing the percent of students in need of special education services through the use of systematic problem solving as a prevention and early intervention process rather than one that requires the student to fall behind prior to receiving assistance

The PS-RtI framework supports the Next Generation PreK-20 Education Strategic Plan areas by:

1. Improving Quality of Teaching in the Education System: PS-RtI provides teachers with the skills to identify at-risk students, to improve performance in the use of student-based data, and to improve performance in the delivery of evidence-based interventions.
2. Professional Development – Increasing the number of leadership training opportunities throughout the state.
3. Strengthening Foundation Skills: PS-RtI is an evidence-based system to significantly improve the academic and behavioral skills of low performing students.
4. Closing the Gap: PS-RtI is an evidence-based method to significantly reduce disproportionality and improve performance for minority populations, students from low socio-economic environments, and English language learners (ELLs).
5. High School Graduation: PS-RtI results in the improvement in performance of students and early intervention will improve graduation rates in the future.
6. Aligning Resources to Strategic Goals: PS-RtI has proven to be a more efficient way of delivering services and deploying personnel, resources, and time allocation.

Florida's IDEA, Part B, State Performance Plan ("SPP"), consists of 20 Performance Indicators that include specific targets to ensure that Florida's students with disabilities are receiving a free and appropriate public education ("FAPE") in the least restrictive environment ("LRE"). The FDOE has a responsibility to support districts and schools in achieving the performance targets for each indicator and for reporting progress annually to the United States Department of Education, Office

of Special Education Programs ("OSEP"). You can access Florida's SPP and Annual Performance Report on the Florida Department of Education, Bureau of Exceptional Education and Student Services, website at http://www.fldoe.org/ese/.

The PS/RtI framework assists Florida districts and schools in addressing applicable SPP indicators in primarily two ways:

1. Problem-Solving: The focus of this framework is to provide districts and schools with a blueprint for problem-solving that addresses district, school, and student-level problems. The entire focus is on systems change and the process of implementing reform efforts that improve student performance, school climate, and family participation.

2. Program Evaluation: Schools and districts are able to use data resulting from PS-RtI implementation to identify areas that require targeted assistance and to document the effects of interventions implemented to address those areas. In particular, this framework is able to provide assistance to districts and schools in addressing disproportionality in the identification of students with disabilities, their educational placements, and discipline.

The quality implementation of PS-RtI directly impacts the SPP indicators. Specific details of each indicator are located in the SPP and can be accessed directly at http://www.fldoe.org/ese/pdf/RevisedSPP.pdf.

Over the past three years, important lessons learned from Florida's Statewide Problem-Solving and Response to Intervention Project reveal a need to make connections and blend resources throughout this process of systems change. As schools and districts confront the challenges involved in building consensus, making connections, aligning efforts, developing an infrastructure, and responding to legislative initiatives, it is essential not to reduce the focus of PS-RtI to its special education relevance. We must remember that the need for RtI-based reforms emerged because of ineffective practices within the previous system, as well as the availability of improved practices based on research. More importantly, the crucial point to understand is that successful implementation of PS-RtI principles encompasses general education initiatives that impact all students. Special education application for the purposes of determining eligibility for specific education programs becomes secondary to the broader implementation.

School leaders must help all educators acknowledge the need for change and embrace a shared purpose of ensuring all students learn at high levels and take collective responsibility for achieving this shared purpose. This represents a shift from operating within territorial silos to depending on blended expertise and resources. See Table 2 – Matrix for Making Connections, which school-based leadership teams can use to blend expertise and resources across state and school-level initiatives.

Section 3 - RtI

Continuous Improvement: The Problem-Solving Process

Making Systemwide Changes

The most significant factor driving educational reform is the focus on outcomes for all students and not just those being considered for special education services through IDEA. Within this framework, the core question becomes "What do we want students to know and be able to do?" Responding to this question requires educators to know what is expected of students academically in all core subject and special areas throughout the course of the academic year. In addition, school districts and schools should have well-defined behavioral expectations that serve as non-negotiable benchmarks for behavior. To illustrate the broad range of students who benefit from existing within a school culture of PS-RtI, consider the application of systematic problem-solving to gifted and high-ability learners. Gifted and high ability learners may also have needs beyond core instruction (Tier 1), and therefore require supplemental interventions for acceleration and enrichment purposes. For related information, access resources on the Working on Gifted Issues (WOGI) website at http://www.unfwogi.com/rti.

In Florida, the expectation that schools provide effective instruction and support to foster success for all students is embedded in Rule 6A-6.0331, Florida Administrative Code (F.A.C.), *General Education Intervention Procedures, Identification, Evaluation, Reevaluation and the Initial Provision of Exceptional Education Services,* which states that "it is the local school district's responsibility to develop and implement coordinated general education intervention procedures for all students who need additional academic and behavioral support to succeed in the general education environment."

This rule includes educational and behavioral evaluations, services, and supports, including scientifically-based literacy instruction. This leads to a need for reconsidering professional development for teachers and other school staff and instruction in the use of adaptive and instructional software as interventions that may be appropriate.

When educators and stakeholders consider the question "What do we want students to know and be able to do?," improved academic and behavioral outcomes are the result. This question is also central when examining response to Tier 1 instruction/intervention (i.e., when considering response to class or grade-level academic and/or behavioral expectations). To effectively implement PS-RtI, Tier 1 questions (see Table 1 – *Imperative Questions*) regarding the efficiency of core instruction must be addressed as a *priority* to examining individual student concerns within the PS-RtI framework.

Steps of the Problem-Solving Process at P.K. Yonge

Regardless of whether examining the effects of core instruction (Tier 1) or determining the need for more intensive supports for groups or individual students (Tier 2 and Tier 3), teams should engage in and follow a systematic problem-solving process. At P.K. Yonge, Student Success Team (SST) meetings are held every six weeks. SST meetings are where learning community teachers, guidance counselors, the school psychologist, the K-12 MTSS coordinator, and administrator(s)

collaboratively engage in the problem-solving process. At these SST meetings, student data is discussed and decisions about tiered instruction are made. Florida's PS-RtI model includes a four-step problem-solving process, which is introduced in Section 1 of this manual.

The four steps of the problem-solving process are as follows:

Step I: Problem Identification – What exactly is the problem?
Step II: Problem Analysis – Why is the problem occurring?
Step III: Intervention Design and Implementation – What exactly are we going to do about it?
Step IV: Response to Instruction/Intervention – Is the plan working?

Within this cyclical process, the problem to be systematically addressed is defined as the discrepancy between what is expected of a student in a given age or grade level and the current, observed level of performance. Hence, the existence of a deficiency is defined, in part, by the discrepancy between expected and observed performance as opposed to any former discrepancies, such as the discrepancy between ability and achievement.

Central to problem-solving is an analysis of factors that impede performance beyond those that may (or may not) reside within the learner. As a result, all factors that impact learning (i.e., instruction, curriculum, environment, and learner variables) are considered through the analysis of student performance data when assessing effectiveness of instruction/intervention and determining student instructional needs.
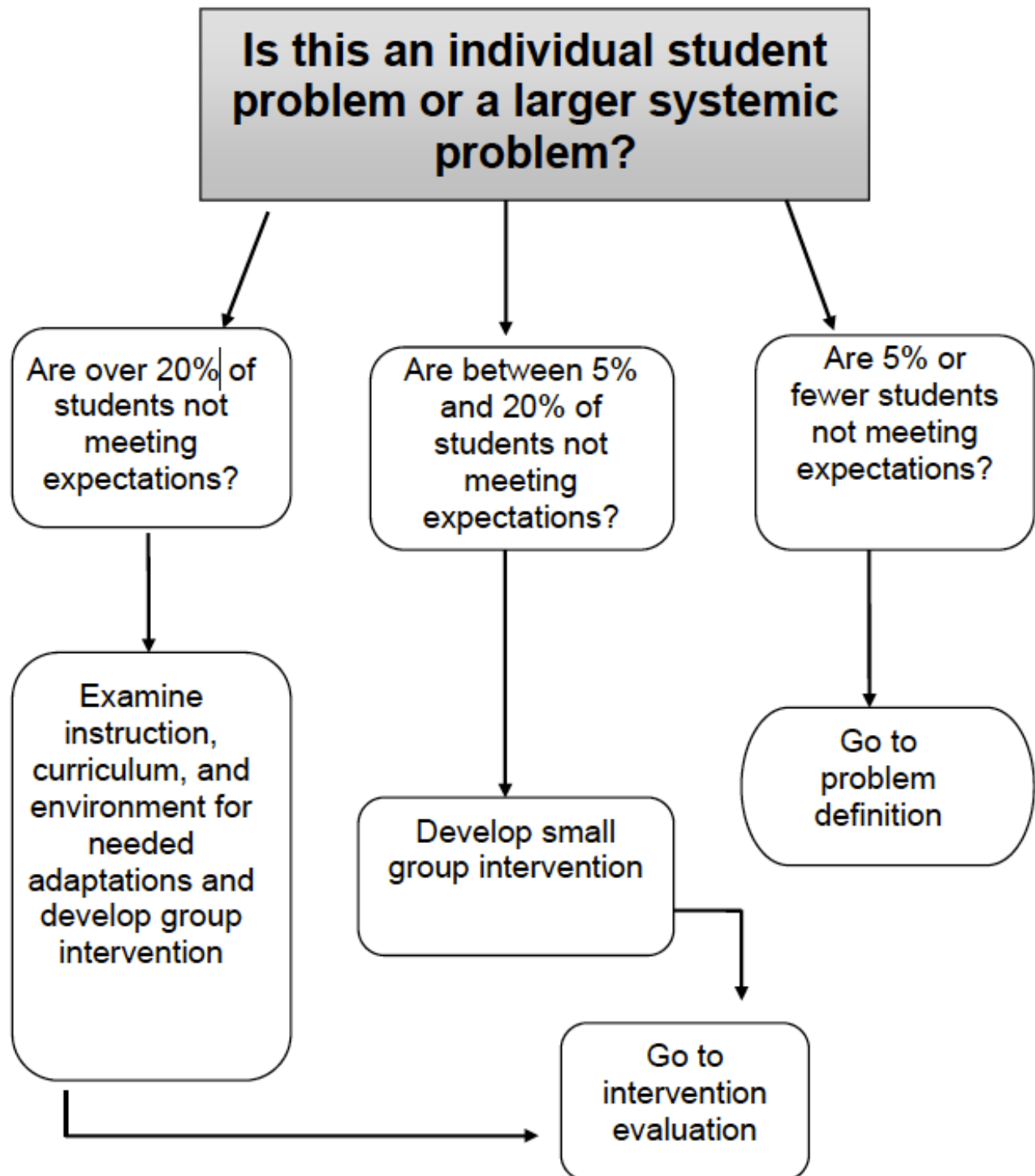
Problem Identification (Step I): During problem identification, teams are asked to consider curricular and behavioral expectations as well as data to determine peer performance. Consideration must be given to the percentage of peers demonstrating performance similar to that of the targeted student, as the response may lead to the hypothesis that the issue is related to instructional, curricular, or environmental variables.

As demonstrated in Figure 2 – Decision Making Rubric for Use with Schoolwide Screening, when 20 percent or more students show similar problems, the likelihood increases that intervening at a group or systemic level may result in the greatest improvement for the most students through efficient use of available resources.

Conducting a gap analysis can help teams determine at which Tier they should intervene (regardless of whether or not the student receives special education services). Essentially teams must ask, "Is it a large group problem, a small group problem, or an individual student problem?" More importantly, by identifying the percentage of students with similar problems, educators can determine if class-wide instruction should be the focus or if individual/small groups of students would benefit from targeted, supplemental intervention.

Figure 2 – Decision Making Rubric for Use with Schoolwide Screening, can assist teams in determining how to focus the problem-solving effort. If the discrepancy between the benchmark and peer group performance is large and the discrepancy between peer group performance and the student's performance is minimal, it would not be appropriate to automatically determine that the student would benefit from special education. Nor would it be appropriate, in this example, to assume that we would only be focusing on an individual student.

Figure 2
Decision Making Rubric for use with Schoolwide Screening

Is this an individual student problem or a larger systemic problem?

Are over 20% of students not meeting expectations?

Are between 5% and 20% of students not meeting expectations?

Are 5% or fewer students not meeting expectations?

Examine instruction, curriculum, and environment for needed adaptations and develop group intervention

Develop small group intervention

Go to problem definition

Go to intervention evaluation

Problem Analysis (Step II): During problem analysis, the team seeks the response to "Why is the problem occurring?" Teams develop hypotheses to explain why the problem is occurring and predict what might prevent the problem from occurring in the future. As the *Problem-Solving/RtI Worksheets* found in Appendix B illustrate, hypothesis statements are framed as "The problem is occurring because _____." Subsequently, prediction statements are written as "If _____ would occur, then the problem would be reduced." Data are collected to confirm or reject the hypotheses that were developed. During this phase, it is important to determine if the problem reflects a skill deficit (i.e., "can't do") or motivation deficit (i.e., "won't do"). For information on problem analysis and, more specifically, on hypotheses development, see the *Problem-Solving/RtI Worksheets*, found in Appendix B.

Intervention Planning and Implementation (Step III): During intervention planning and implementation, the team focuses on "What are we going to do about it?" Specifically, the *Problem-Solving/RtI Worksheets* found in Appendix B guide teams through the process of identifying who is responsible for intervention plan implementation, what will be done, when will it occur, and where will it occur. Components of the comprehensive intervention plan found in Appendix B, also include a support plan, intervention documentation, and monitoring the plan for determining student rate of progress.

Response to Instruction/Intervention (Step IV): Evaluating the students' actual response to the instruction/intervention is a critical component of this model. Review and analysis of data are used to determine if the plan is working. The worksheet for Step IV, included in Appendix B, guides the team through thoughtful consideration of graphed data to determine if there has been a positive, questionable, or poor response to intervention.

Decision Rules

Response to instruction/intervention is considered positive when the gap between expected performance and observed performance is closing. Ideally, the point at which the target student will "come in range" of grade-level expectations—even if it is the long range—can be extrapolated. Questionable response to instruction/intervention exists when the rate at which the gap is widening slows considerably but is still widening, or when the gap stops widening but closure does not occur. The student(s) response to instruction/intervention is considered poor when the gap continues to widen with no change in rate of progress after the instruction/intervention is implemented. The conditions of positive, questionable, or poor response to instruction/intervention result in different sets of decisions to be made, as is described and illustrated as follows:

Positive–Under positive conditions, the current instruction/intervention may be continued with the same or increased goal. Or the current level of instruction/intervention may be faded gradually to determine whether the same level of intensity of instruction is necessary for student success.

Questionable–When the response is questionable, the first question to be asked is one of intervention implementation fidelity—"Was the intervention implemented as intended?" If not, then supports to increase implementation fidelity are put in place. If implementation fidelity is demonstrated, then the intensity of the current instruction/intervention may be increased for a short period of time. If rate of progress improves, then instruction is continued at the more intense

level. If the rate does not improve then a return to Steps 1 and 2 of problem solving is necessary.

Poor–When the response is poor, the same question of implementation fidelity is asked. Again, if implementation fidelity is problematic, supportive strategies to increase implementation fidelity are employed. If implementation integrity is good, then the steps of problem solving are retraced, asking: "Is the instruction/intervention aligned with the verified hypothesis, or are there other aligned interventions to consider?" (Intervention Design); "Are there other hypotheses to consider?" (Problem Analysis); and "Is the problem identified correctly?" (Problem Identification).

It is important that the first question to ask if the response is questionable or poor is whether the instruction/intervention was implemented with fidelity. The purpose of monitoring implementation fidelity is *not* to evaluate the teacher's performance. Rather, it is to ensure that the team is making decisions based on what was actually provided to the student. Ultimately, the purpose for each component of PS-RtI is to increase student outcomes. Planning supports for the person delivering the instruction/intervention, such as training, coaching, documentation methods, and materials, helps the team monitor implementation fidelity. For each level of response, teams either increase supports that will allow for implementation fidelity, continue with current instructional supports, adjust goals, increase intervention intensity, or reconsider hypotheses, depending on the student data.

Figure 3 is The K-12 Multi-Tiered Systems of Support for Learners Not Meeting Benchmarks and Figure 4 is The K-12 Multi-Tiered Systems of Support for Learners Exceeding Benchmarks. These figures can be used as support documents in order to make decisions at SST meetings.

Figure 3 - P.K. YONGE MULTI-TIERED SYSTEMS OF SUPPORT FOR LEARNERS NOT MEETING BENCHMARKS
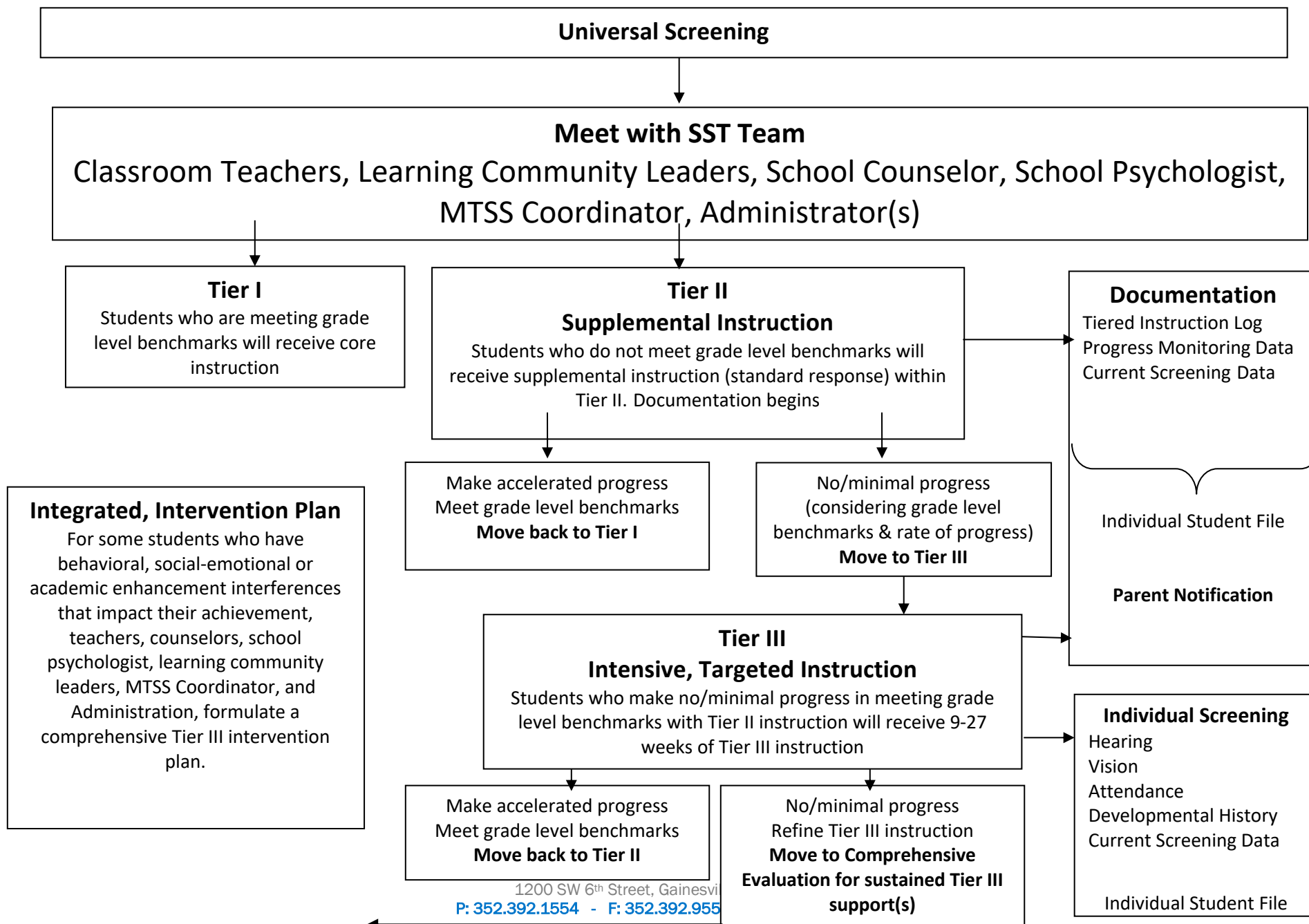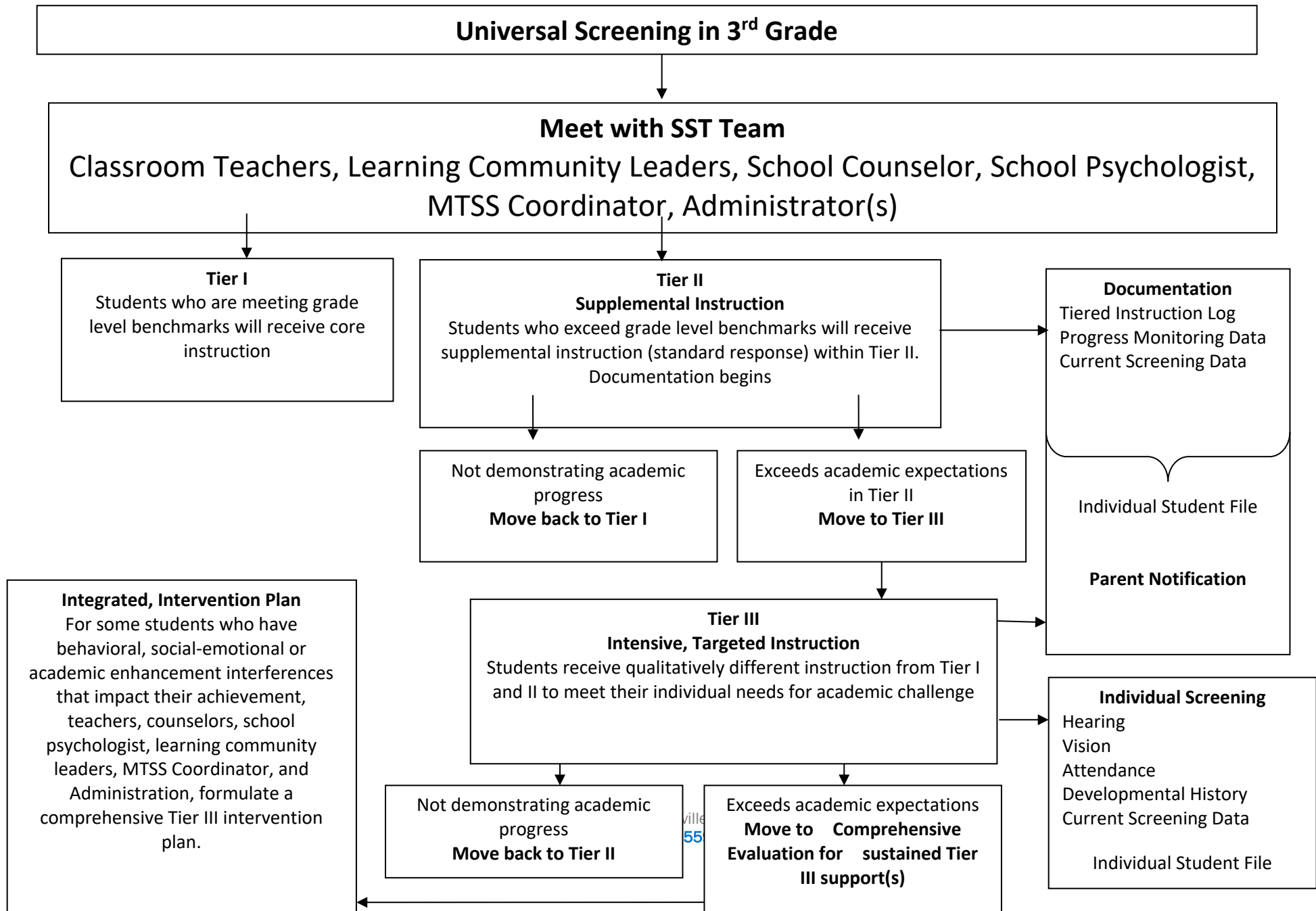
Universal Screening

Meet with SST Team

Classroom Teachers, Learning Community Leaders, School Counselor, School Psychologist, MTSS Coordinator, Administrator(s)

Tier I
Students who are meeting grade level benchmarks will receive core instruction

Tier II
Supplemental Instruction
Students who do not meet grade level benchmarks will receive supplemental instruction (standard response) within Tier II. Documentation begins

Documentation
Tiered Instruction Log
Progress Monitoring Data
Current Screening Data

Individual Student File

Parent Notification

Make accelerated progress
Meet grade level benchmarks
Move back to Tier I

No/minimal progress (considering grade level benchmarks & rate of progress)
Move to Tier III

Integrated, Intervention Plan
For some students who have behavioral, social-emotional or academic enhancement interferences that impact their achievement, teachers, counselors, school psychologist, learning community leaders, MTSS Coordinator, and Administration, formulate a comprehensive Tier III intervention plan.

Tier III
Intensive, Targeted Instruction
Students who make no/minimal progress in meeting grade level benchmarks with Tier II instruction will receive 9-27 weeks of Tier III instruction

Individual Screening
Hearing
Vision
Attendance
Developmental History
Current Screening Data

Individual Student File

Make accelerated progress
Meet grade level benchmarks
Move back to Tier II

No/minimal progress
Refine Tier III instruction
Move to Comprehensive Evaluation for sustained Tier III support(s)

Figure 4 - P.K. YONGE MULTI-TIERED SYSTEMS OF SUPPORT FOR LEARNERS EXCEEDING BENCHMARKS

Universal Screening in 3rd Grade

Meet with SST Team
Classroom Teachers, Learning Community Leaders, School Counselor, School Psychologist, MTSS Coordinator, Administrator(s)

Tier I
Students who are meeting grade level benchmarks will receive core instruction

Tier II
Supplemental Instruction
Students who exceed grade level benchmarks will receive supplemental instruction (standard response) within Tier II. Documentation begins

Documentation
Tiered Instruction Log
Progress Monitoring Data
Current Screening Data

Individual Student File

Parent Notification

Not demonstrating academic progress
Move back to Tier I

Exceeds academic expectations in Tier II
Move to Tier III

Integrated, Intervention Plan
For some students who have behavioral, social-emotional or academic enhancement interferences that impact their achievement, teachers, counselors, school psychologist, learning community leaders, MTSS Coordinator, and Administration, formulate a comprehensive Tier III intervention plan.

Tier III
Intensive, Targeted Instruction
Students receive qualitatively different instruction from Tier I and II to meet their individual needs for academic challenge

Individual Screening
Hearing
Vision
Attendance
Developmental History
Current Screening Data

Individual Student File

Not demonstrating academic progress
Move back to Tier II

Exceeds academic expectations
Move to   Comprehensive Evaluation for   sustained Tier III support(s)

General Education Interventions

In conjunction with the FDOE's goal to increase student proficiency within a seamless system, Florida districts and schools are responsible for implementing a coordinated system of intervention procedures for each student needing additional academic and behavioral support (Rule 6A-6.0331(1), F.A.C.). A coordinated, multi-tiered system of intervention support facilitates the success of all students and ensures that students receive the prevention and early intervention services that promote academic success. The general education interventions rule aligns with the statutory requirements to address the needs of students with instruction and intervention that is targeted to improve the student's achievement (s. 1008.25(4), F.S.) and with the intent of IDEA to improve educational outcomes for students with disabilities.

Rule 6A-6.0331(1)(e), F.A.C., requires that schools implement evidence-based interventions to address the identified area(s) of concern in the general education environment. These interventions must be developed through a problem-solving process that uses student performance data to identify and analyze the area(s) of concern, select and implement interventions, and monitor the effectiveness of the interventions. The intensity and instructional focus of the interventions should match student need, and interventions must be implemented as designed and long enough for the interventions to have the expected effect. Ongoing progress monitoring must be conducted and used to evaluate the student's progress and to revise the interventions when the interventions do not result in sufficient improvement. Therefore, in accordance with Rule 6A-6.0331(1)(e), F.A.C., taking responsibility for providing effective interventions that result in positive student response through general education resources is required.

Section 4 - RtI

Team Engagement

Parent Involvement

Parent involvement in education has been widely reviewed and found to be highly linked to student learning and achievement. Reporting data to parents and involving them in decision-making is critical for student success, and it is a requirement of both ESEA and IDEA. P.K. Yonge must help facilitate parent understanding and involvement in this decision-making, and parental involvement is a key component for having an effective PS-RtI framework. The school must include parent communication and input in all phases of the problem-solving process.

Different kinds of information should be shared with parents at different levels of the PS-RtI framework. Specific to Tier 1 instruction, data reflecting student progress within the core academic and/or behavioral curricula should be shared with parents of all students. During parent-teacher conferences, graphs of student progress should be provided with explanations regarding student performance. Strategies and materials for home instruction also should be shared. Also, parents may want to use a participation form to help them record notes during problem-solving meetings.

Students receiving Tier 2 supplemental instruction, in addition to the core academic and behavioral curricula, must be progress monitored more frequently. Reports of student progress also must be shared with parents more frequently at this level. Obtaining parent input and engaging parents at this phase is critical for student success. Parents should be offered specific support regarding skills that need improvement. It might be helpful to provide the parent with written documentation of what data have been collected, the intervention plan(s) put in place to improve skills, and how the plan(s) are monitored. For students receiving additional support through tutoring, schools should make efforts to communicate with the parents/tutor to help bridge the understanding of deficit skills and evidence-based interventions that are being used to address the areas of concern. This helps to ensure that the supplemental intervention being provided is aligned with the core instruction and supports.

Students receiving Tier 3 intensive interventions for specific academic or behavioral skills are progress monitored most frequently. Parents should be invited to participate in problem-solving meetings to analyze their child's progress (response to the Tier 3 interventions) and help make decisions about their instruction. The school should encourage parents to document services that are being provided outside of the school day. Parents should also be provided with detailed graphs and clear explanations of their child's response to instruction/intervention over time. If the team involved in problem-solving is considering the need for evaluation procedures to potentially access special education resources, parents also must be informed of their procedural due process rights under IDEA.

Educator Involvement

Effective leadership is a vital component for a school to be successful within the PS-RtI framework. Collaboration among administrators, content area specialists, data specialists, and

other school and district staff should represent instructionally relevant team membership. Problem-solving teams should be identified or created and used to problem solve at different levels (school level, grade level, class level, subgroup level, or student level) and may include various members, depending on the need. Though referred to with a wide variety of names, any team engaged in problem solving is considered a problem-solving team. Level of expertise, skill, and knowledge will determine the members of these teams, rather than title. Additionally, members of the problem-solving team will need to have a shared consensus regarding a clearly stated purpose of engaging in problem solving: to increase student learning, as is continually verified by students' positive response to the instruction/interventions being provided.

The makeup of the team engaged in problem solving varies depending upon the purpose and level of the problem solving. Membership for effective problem solving at the *school* or *grade level* should include individuals who are knowledgeable about expected school-wide (or grade level) academic and behavioral performance and rate of progress and have an in-depth understanding of the specific challenges in the school. Members include, but are not limited to, administration, K-12 MTSS coordinator, guidance counselor(s), grade-level representation, learning community leaders, and parents.

Problem-solving teams at the *individual student level* should always include the parents of the student. Team members should be included according to their knowledge of the student, grade-level expectations, the problem-solving process, evidence-based academic and behavioral interventions, progress monitoring, and diagnostic assessment to inform instruction. Members include the school administrator; a general education teacher; a special education teacher/learning community leader; someone knowledgeable in reading, math, and/or behavior; school counselor, school psychology team, dean, program development and outreach specialist, and exceptional student education ("ESE") coordinator. Members should be added depending on the student's needs.

When forming team membership at all levels of the framework, consider the following example: If the student requires acceleration or enrichment in one or more areas in order to remain engaged in the curriculum, then the specialist for gifted learners is an important member of the problem-solving team.
Administrators should consider all potential resources on staff, such as fine arts teachers, media specialists, etc. Depending on the nature of the problem, anyone the school employs may be identified as a valuable resource. Administrators should also consider existing teams, such as grade-level teams, that should engage in systematic problem solving at the Tier 1 and Tier 2 levels.

Responsibilities
The general role of the problem-solving team is to focus on improving academic and behavioral outcomes for students. In order to accomplish this task, the problem-solving team will need to have certain core responsibilities. An effective problem-solving team begins by reviewing student performance data (academic and/or behavioral) at the whole school, grade, class, and subgroup levels. When reviewing the data, it is important to identify any trends that may demonstrate an area of concern. Once an area is identified, the problem-solving team develops hypotheses as to why the problem is occurring. Once a team has verified one or more hypotheses, an intervention plan will be created to improve the area of concern. It will be essential to consider the resources available at the school and how best to use them. The problem-solving team will review the effectiveness of the intervention and adjust as needed. Refer to Section 3 for detailed

descriptions of problem solving at each of the four steps in the process.

In order for meetings to be effective, problem-solving teams should consider the frequency and duration of their meetings as well as the roles and procedures used during the meetings. For instance, a school-level problem-solving team may not need to meet as frequently as a grade- or individual-level team.

It is also important to have a set of procedures that are consistently used during meetings to ensure that the time is spent efficiently. Problem-solving team meetings should conclude each occurrence with a written plan that outlines not only the intervention plan, including how progress and fidelity will be monitored, but also the on-going responsibilities of each of the team members. At least one member of the team should be proficient using the problem-solving process systematically so that he or she can effectively facilitate the thinking process.

Section 5 - RtI

Special Education Eligibility Decisions

There are multiple state board rules that require school districts to use a problem-solving process. They include:

- General Education Intervention Procedures, Identification, Evaluation, Reevaluation and the Initial Provision of Exceptional Education Services (Rule 6A-6.0331, F.A.C.)
- Exceptional Education Eligibility for Students with Specific Learning Disabilities (Rule 6A-6.03018, F.A.C.)
- Exceptional Education Eligibility for Students with Language Impairments and Qualifications and Responsibilities for the Speech-Language Pathologists Providing Language Services (Rule 6A-6.030121, F.A.C)
- Exceptional Student Education Eligibility for Students with Emotional/Behavioral Disabilities (Rule 6A-6.03016, F.A.C.)

School districts and other public schools in Florida are required to use a problem-solving process that determines how a student responds to scientific, research-based interventions (PS-RtI) when determining whether that student is, or continues to be, eligible for special education. The primary catalyst for these changes came from the 2004 reauthorization of the federal IDEA and the corresponding regulations issued in 2006. Specifically, 34 Code of Federal Regulations (CFR) 300.307 allows a state education agency to adopt criteria to identify students in the category of specific learning disabilities (SLD) using a process that determines how a student responds to scientific, research-based interventions and requires school districts to use the established criteria. Florida has decided to adopt the RtI framework with respect to identifying students in most all other categories as well.

Using information on how a student responds to scientifically-based instruction and intervention (i.e., PS- RtI) when determining whether a student is eligible for special education services represents a significant shift in practices used to identify students with disabilities. The focus shifts away from identifying and diagnosing characteristics that are internal to the student and moves to identifying effective instruction and intervention. This redefines the target as the determination of those conditions that enable learning, rather than on identifying disabling conditions. When using a student's response to intervention as a basis for special education eligibility decisions, ask the following questions:

- What is the discrepancy between the student's level of performance and the peer group and/or standard?
- What is the student's educational progress as measured by rate of improvement?
- What are the instructional needs of the student?

There are many advantages to using data collected within a PS-RtI system to support eligibility decisions over more traditional models of disability identification, including the following:

- Student needs are addressed proactively. The monitoring of student progress is early and

frequent, which allows for scientifically based instruction and intervention to be delivered as soon as possible.

- The delivery of scientific, research-based instruction and intervention reduces the number of students who require resources through special education due to a mismatch between the instruction, curriculum, environmental conditions, and the student's needs.
- Staff members spend their time focusing on finding what works for students and the conditions under which they are most successful instead of attempting to identify problems that are internal to the student and presumed to be stable across environments and across time.
- Eligibility determination is based more emphatically on educational need. Those with the greatest need are given the most support.
- Problem solving within the RtI framework continues when students receive special education supports, and the school team continues to work to provide instruction and interventions that result in the greatest progress for the student. The team continues to make regular and ongoing instructional decisions based on data, including when special education resources may no longer be necessary.

Consent and Evaluation Requirements When Determining Eligibility for Special Education

The integration of a PS-RtI framework in State Board of Education (SBE) rules has promoted new ways of thinking about addressing the needs of all students. Because Rule 6A-6.0331(1), F.A.C., permits districts and public schools to conduct academic and behavioral evaluations when planning interventions in the general education setting, districts and schools must clarify when parental consent is required and how to determine completion of the evaluation procedures when students are referred for an evaluation to determine eligibility for special education.

The following questions and answers are intended to clarify requirements regarding consent and evaluation:

What is an evaluation to determine eligibility for special education and related services?

Many parents and professionals use the term "evaluation" to mean a test, or battery of tests, that are scheduled and administered on a given date. Although an evaluation may include specific assessment instruments, in the context of IDEA and corresponding SBE rules, an evaluation refers to all of the procedures used to determine whether a student is a student with a disability and the nature and extent of the student's special education and related service needs (Rule 6A-6.03411(1)(I), F.A.C.). An evaluation consists of all relevant assessment tools and strategies used to collect functional, developmental, and academic information about a student in order to determine specialized instructional need and if a student is eligible as a student with a disability. Therefore, an evaluation includes existing data on the student collected prior to obtaining parental consent for evaluation (e.g., classroom performance; observations; interviews; screening, progress monitoring, diagnostic assessments; and district and state assessments) and any additional assessment procedures conducted subsequent to receipt of parental consent.

What constitutes the need to obtain consent?

Parental consent for an evaluation is required before the school conducts an initial evaluation to determine whether a student is eligible for special education and related services.

Within an on-going, problem-solving process, there may come a time when the student's response to intervention leads the team to suspect that the student might need special education and related services. The team must promptly obtain parental consent prior to conducting an initial evaluation to determine eligibility for special education in the following situations:

- When the student's response to interventions indicates that intensive interventions are effective but require a high level of intensity and resources to sustain growth or performance (this is empirically established by fading the intervention and measuring student response).

- When the student's response to interventions indicates that the student does not make adequate growth given effective core instruction and intensive, individualized, evidence-based interventions.

- When a parent initiates a request for an initial evaluation. If, upon review of the parent's request, the district determines the evaluation is not appropriate, then the parent must be provided with written notice of its refusal to conduct the evaluation.

* Growth is measured relative to state-approved, grade-level benchmarks/standards or relative to behavioral expectations.

Prior written parental consent is required whenever the school proposes to conduct assessment procedures for the purpose of determining eligibility for special education and related services. Therefore, once the team suspects a disability, consent is required for any subsequent assessment procedures, including the collection of additional progress-monitoring data.

Is consent required to conduct evaluations or assessment procedures that inform general education interventions?

Parental consent is not required if the sole purpose of obtaining assessment data is to inform instruction or intervention in general education (Rule 6A-6.0331(1), F.A.C.). It is the purpose for which the assessment data are used, not the nature of the assessment procedures that drives consent. If assessment and data collection procedures are conducted for the purpose of determining eligibility, then consent is required (Rule 6A-6.0331(4), F.A.C.).

How does the team determine what an evaluation should include?

As part of an initial evaluation, the team, including the parent, must review existing data on the student and, based on the review and input from the parents, identify what additional data are needed to determine eligibility and the nature and extent of special education need. In determining what additional data are needed, the team must ensure that the evaluation identifies all of the student's special education and related services needs as well as establishes the presence of a disability. The evaluation must be individualized and comprehensive, requiring that the team address the unique circumstances of each student as well as the characteristics of the suspected disability.

The school is required to provide written notice of its proposal to evaluate the student. The notice must include a description of any evaluation procedures the district proposes to conduct, including both the administration of formal assessment instruments and the ongoing collection of

progress-monitoring data, if such data will be used to determine eligibility. It is important that the team clarify what constitutes an "evaluation" when obtaining written consent from a parent.

How is the evaluation completion date determined?

The school must complete the evaluation within 60 school days that the student is in attendance after receiving parental consent, unless extended in writing by mutual agreement between the parents and the team (this extension only applies to specific learning disabilities per Rule 6A-6.03018(3)(b), F.A.C.). The evaluation is complete after the last evaluation procedure is conducted or when the team determines there is sufficient information to determine eligibility for special education. Once the evaluation is completed, the district must determine eligibility within a reasonable timeframe.

Could an evaluation to determine eligibility be completed without written parental consent?

Yes. OSEP provides policy guidance stating that parental consent for an evaluation is not required if the team of qualified professionals determines that existing data are sufficient to establish disability and educational need without conducting further evaluation. OSEP's guidance reflects the U.S. Department of Education's belief that a review of existing data would be sufficient to determine disability and need in limited circumstances. Examples of when consent to evaluate would not be required include children transitioning from Part C Early Steps to Part B services, when the assessment data Early Steps provided are sufficiently comprehensive to make an eligibility decision; or students have received comprehensive medical and educational evaluations as part of treatment provided in a rehabilitation center.

If a team concludes that existing data are sufficient to determine both the presence of a disability and the educational needs of the student, the parent must be given the opportunity to request further assessment even if the public agency determines that no additional assessment data are needed. As welcomed participants engaged in problem solving and educational planning, parents should always be aware and informed of proposed actions. The 60-day timeline does not apply if the evaluation is based on review of existing data and parent consent is not obtained. In these situations, the eligibility determination must occur promptly.

How can this be illustrated to school-based teams?
Details of the consent and evaluation process are illustrated in Figure 5 –Consent and Evaluation Flow Chart and Figure 6– Consent for Evaluation within the Problem-Solving/Response to Intervention/Instruction Framework.

Figure 5
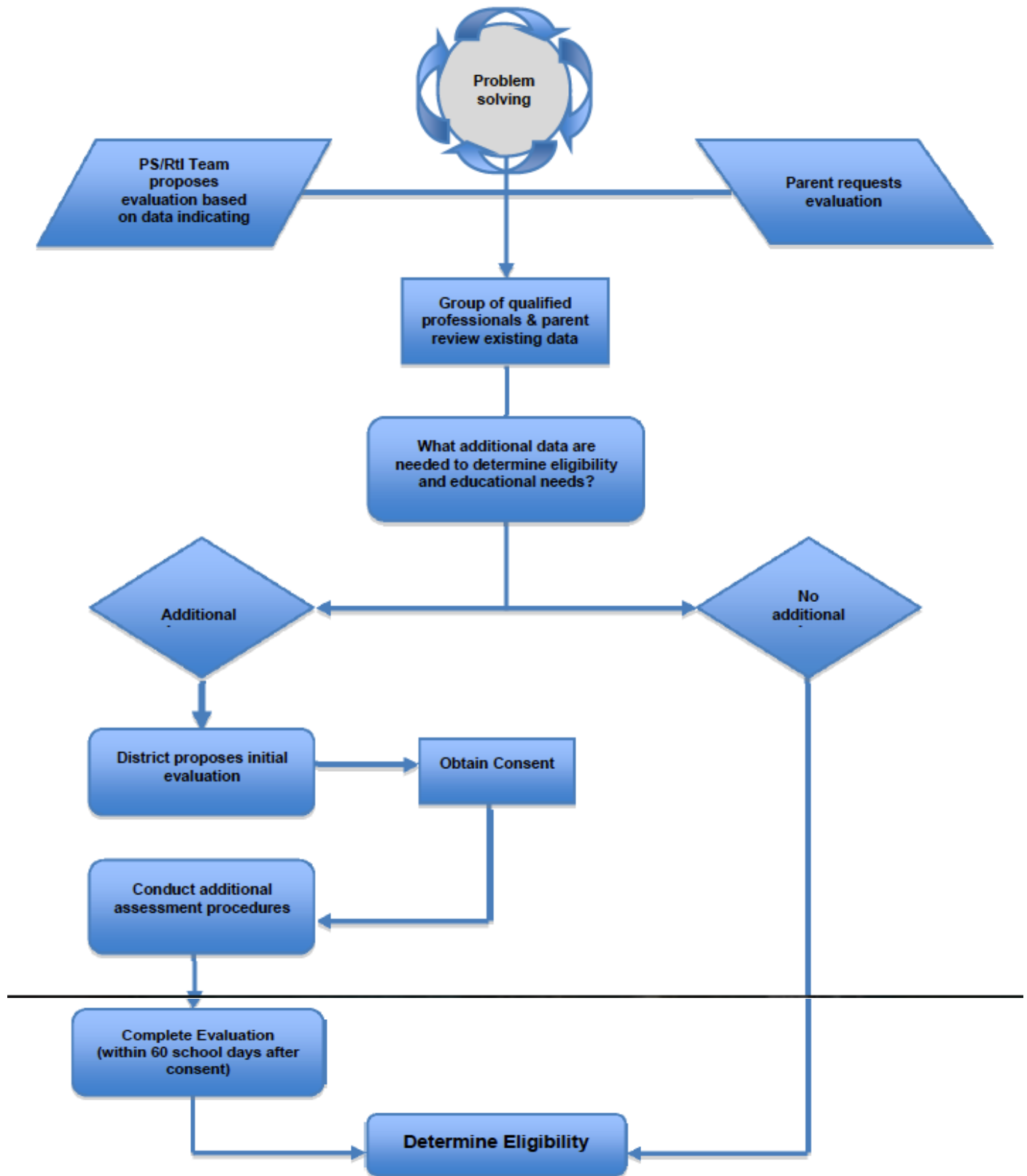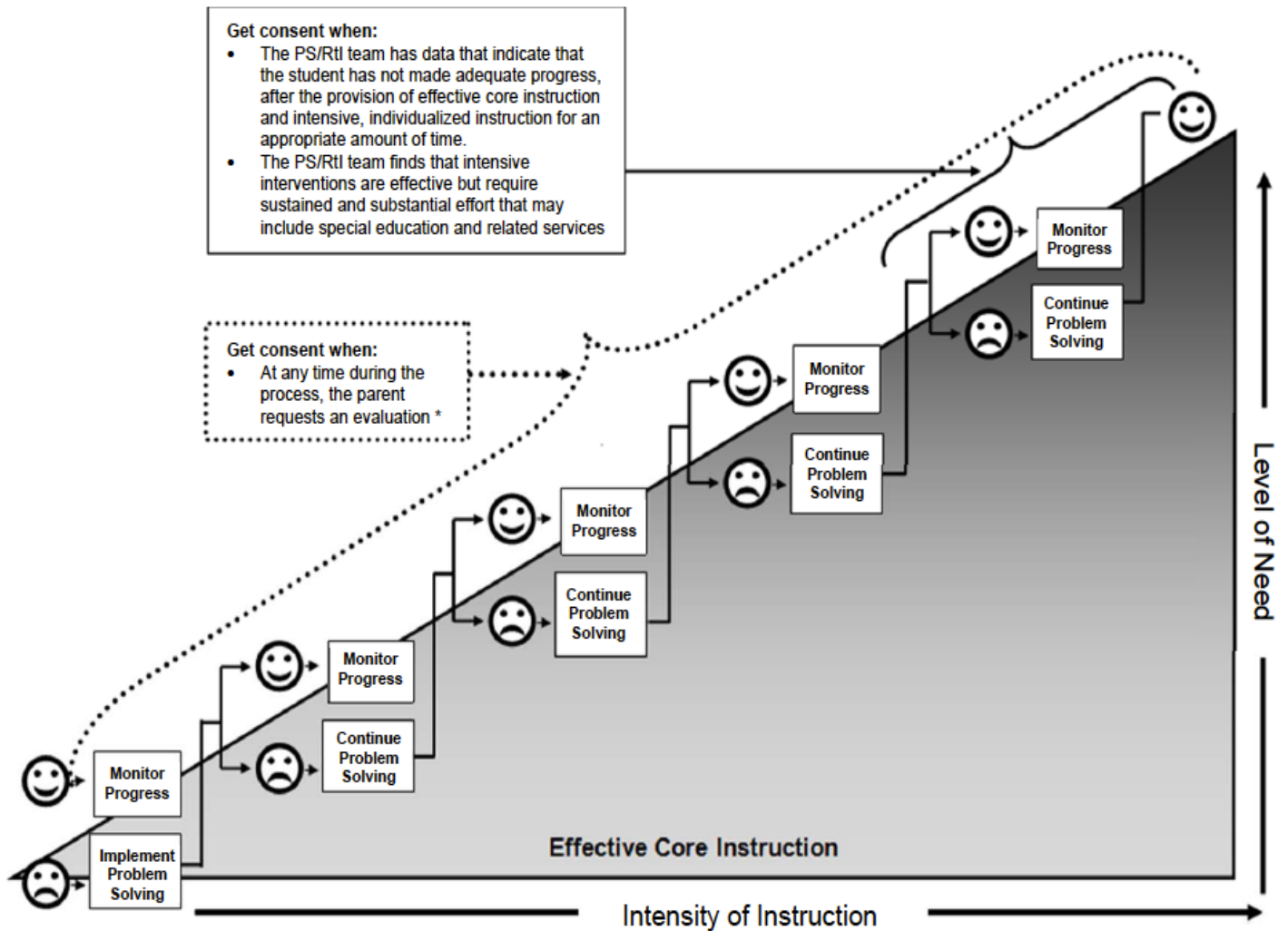## Consent and Evaluation Flowchart

Problem solving

PS/RtI Team proposes evaluation based on data indicating

Parent requests evaluation

Group of qualified professionals & parent review existing data

What additional data are needed to determine eligibility and educational needs?

Additional

No additional

District proposes initial evaluation

Obtain Consent

Conduct additional assessment procedures

Complete Evaluation (within 60 school days after consent)

Determine Eligibility

Figure 6
Consent for Evaluation Within RtI Framework

Get consent when:
- The PS/RtI team has data that indicate that the student has not made adequate progress, after the provision of effective core instruction and intensive, individualized instruction for an appropriate amount of time.
- The PS/RtI team finds that intensive interventions are effective but require sustained and substantial effort that may include special education and related services

Get consent when:
- At any time during the process, the parent requests an evaluation *

Level of Need

Intensity of Instruction

Monitor Progress

Continue Problem Solving

Implement Problem Solving

Effective Core Instruction

* The district must either conduct the evaluation or provide the parent with written notice of refusal that includes the following: (1) a statement of what is being refused and the reason for the refusal; (2) the data sources upon which the refusal is based; (3) other options considered and why they were rejected; (4) any other factors relevant to the refusal; and (5) a statement that the parents have rights under the procedural safeguards, the means by which the parent can get a copy of them, and sources to contact for assistance in understanding them.

Considering Independent Evaluations

As part of an evaluation to determine whether a student has a disability and the educational needs of the student, a group of professionals determining eligibility must review existing evaluation data, including evaluations and other information parents provide. Independent educational evaluations must meet the school's criteria for conducting an evaluation, including qualifications of the examiner (Rule 6A-6.03311(6), F.A.C.). If the outside evaluation meets the school's criteria (including qualifications of the examiner) for conducting an evaluation, the results must be considered in decisions with respect to the provision of a FAPE to the student, but the school is not obligated to accept the recommendations of the outside evaluator. The authority to determine the presence of a disability and educational need is placed with the team, which consists of a group of qualified professionals and the parent(s).

It is likely that the school will need to supplement the results of independent educational evaluations obtained by a parent, especially because the student's response to intervention is an eligibility criterion. The criteria for determining eligibility should be clearly explained to parents and communicated with independent educational evaluators so that independent evaluations can provide assessment data relevant to determining disability and educational need. If a parent presents an independent evaluation that does not meet the district's eligibility criteria, then the following should be explained to the parent: (1) the specific eligibility criterion needed and (2) the reason why the independent evaluation does not provide the information needed to determine eligibility.

Connecting Evaluation to Student Achievement

The primary purpose of assessment is to gather information that leads to improved academic and/or behavioral outcomes for students. Evaluations conducted in educational settings may include many procedures, both formal and informal, that provide information relevant for educational programming and that support the development of effective interventions. Educationally relevant evaluations include the assessment of instruction, curriculum, and learning environment, as well as the assessment of student performance and other student-related variables.

The U.S. Department of Education supports *models that focus on assessments that are related to instruction and promote intervention for identified children in the analysis of comments and changes* section of the Federal Regulations implementing IDEA (71 Federal Register [Fed. Reg.] 46647). The increased emphasis on using information on how a student responds to scientifically based instruction and intervention to support eligibility decisions is coupled with a decreased emphasis on the use of standardized, norm-referenced assessments of cognitive ability and cognitive processing. IDEA makes it clear that the determination of a severe discrepancy between IQ and achievement is not necessary in order to identify a student as having a specific learning disability.

Additionally, none of the federal regulations addressing special education evaluation requirements, including the additional procedures for SLD identification, specify that a particular type of assessment (e.g., assessment of psychological or cognitive processing) must be conducted. Of particular relevance is the USDOE's response in the "Analysis of Comments and Changes" section of the federal regulations:

The Department does not believe that an assessment of psychological or cognitive processing should be required in determining whether a child has an SLD. There is no current evidence that such assessments are necessary or sufficient for identifying SLD. Further, in many cases, these assessments have not been used to make appropriate intervention decisions.

71 Fed. Reg. 46651

When using RtI data to determine whether a student is eligible for special education services as a student with a disability, a variety of sources of information is needed. Screening, progress monitoring, and diagnostic/prescriptive assessment data can provide the information necessary for determining a student's performance discrepancy from the peer group and grade-level standard. It can also be used to establish a pattern of educational progress over time and identify the educational circumstances under which the student performs his or her best.

Eligibility Decisions in Specific Program Areas: Specific Learning Disabilities and Language Impairments

Making an eligibility decision for a specific special education category such as SLD and language impairments (LI) occurs within the context of the problem-solving process and subsequent to obtaining consent to evaluate and conducting the comprehensive evaluation procedures. When engaging in eligibility decision-making, consider the context and order of events as they occur as an ongoing process for the primary purpose of improving the effect of instruction for the student, rather than for the purpose of deciding on a categorical placement. If teams maintain focus on the ultimate purpose of increasing the student's level of performance and rate of progress, then making an eligibility decision will not impact the ongoing problem solving and monitoring of the students' response. Instead of interrupting the process or changing the focus of problem solving, the eligibility decision becomes an event for the purpose of matching available resources to provide for students' instructional needs, thereby improving student outcomes.

The purpose of Appendix E – Decision-Making Tool for SLD and LI Eligibility is to assist school-based teams in analyzing and evaluating existing data to make eligibility decisions. In accordance with Rule 6A 6.03018, F.A.C., *Exceptional Education Eligibility for Students with Specific Learning Disabilities,* and Rule 6A-6.030121, F.A.C., *Exceptional Education Eligibility for Students with Language Impairments and Qualifications and Responsibilities for the Speech-Language Pathologists Providing Language Services,* this tool may be used after consent to evaluate has been obtained and the team determines that all of the necessary assessment data have been gathered.

The purpose of the Decision-Making Tool for SLD and LI Eligibility found in Appendix E is not solely to document procedural requirements for compliance. Rather, it is a tool to guide the team's analysis. As a secondary purpose, it provides a vehicle for the required documentation. The *Exceptional Student Education (ESE) Compliance Self-Assessment: Processes and Procedures Manual* can be accessed for guidance about documenting compliance **components at** http://www.fldoe.org/ese/pdf/m-compli.pdf.

Required Documentation: Written Summary of the Group's Analysis

State Board of Education rules require that, for a student suspected of having a specific learning disability or language impairment, the documentation of the determination of eligibility must include a written summary of the group's analysis of the data. The written summary must incorporate the elements listed in Rule 6A-6.03018 and 6A-6.030121, F.A.C.:

- The basis for making the determination.
- Observations establishing the relationship between behavior and academic functioning.
- Educationally relevant medical findings.
- Data confirming the existence of a specific learning disability or language impairment, including performance discrepancy, rate of progress, and educational need.
- The group's determination of the effect of other factors, and evidence that one or more of the factors is not the primary cause of the student's difficulty. See Table 4 – Documentation of Factors that Affect Level of Performance and Rate of Progress for resources that can be used to make this determination.
- RtI information documenting the intervention plan, student-centered data collected, the level of response of instruction/intervention, parent involvement, and the required signatures.

The written summary must reflect the professional opinion of the group responsible for determining eligibility. There is no requirement for any additional formal reports, such as separate evaluation reports, but districts may develop procedures for documenting and reporting response to intervention data and the rationale for the eligibility decision. The expectation is that the rationale and/or justification for the team's decision be clear from the evidence provided and the summary of the team's analysis of that evidence.

Previous examples of coversheets that may be used to organize documentation that guides the eligibility decision process and written summary exist as appendices in two technical assistance papers (TAPs) published by the FDOE, Bureau of Exceptional Education and Student Services, titled *Questions and Answers: State Board of Education Rule 6A-6.03018, Florida Administrative Code, Exceptional Education Eligibility for Students with Specific Learning Disabilities,* and *Questions and Answers: State Board of Education Rule 6A- 6.030121, Florida Administrative Code, Exceptional Education Eligibility for Students with Language Impairments and Qualifications and Responsibilities for the Speech-Language Pathologists Providing Language Services.* These TAPs are available online at the Bureau of Exceptional Education and Student Services website, at http://www.fldoe.org/ese/tap-home.asp.

Reevaluation Decisions

At least once every three years the district must reevaluate a student with a disability. A reevaluation may occur more often if a parent or a teacher requests it but may not occur more than once per year unless the parent and the district agree. As the construct of "evaluation" has evolved from the administration of a battery of standardized assessments to the review and analysis of data collected through the PS-RtI process in conjunction with formal assessment data as needed, teams have struggled with reevaluation for students identified as SLD, Emotional/Behavioral Disability (E/BD), or LI, asking "What does reevaluation look like within the PS-RtI framework?"

Beginning with the 1997 reauthorization of IDEA, districts have not been required to conduct, for reevaluation, the same comprehensive evaluation required for an initial evaluation and eligibility decision. Instead, as part of any reevaluation, the members of the student's individual

education plan ("IEP") team, including the parent, review existing evaluation data, including information provided by the parent; current classroom-based, local, and state assessments; ongoing progress monitoring; and observations. Because schools are increasingly operating within a PS-RtI culture, a wealth of data about students' needs are available to the IEP team at any point in time. On the basis of that review, the team identifies what additional data, if any, are required in order to determine the following:

1. Whether the student continues to be a student with a disability and the educational needs of the student
2. The present levels of academic achievement and functional performance of the student
3. Whether the student continues to need special education and related services
4. Whether any additions or modifications to the student's special education and related services are needed to enable the student to meet the measurable annual goals set out in the IEP and participate, as appropriate, in the general education curriculum

With the exception of sensory impairments that require specific formal assessments as part of reevaluation (i.e., deaf or hard-of-hearing, dual-sensory impairment, visual impairment), the IEP team determines what information is needed to answer the questions above and the best way to obtain it. Students continue to benefit from PS-RtI implementation until effective interventions have been identified and growth can be maintained. This includes both general education students and students who have been determined eligible for special education services. Data collected by the PS-RtI team or by individual special education or general education teachers to measure the student's progress toward the annual goals may also inform the reevaluation process, including the decision regarding continuing eligibility and determining the educational needs of the student.

If the IEP team determines that no additional data are needed, the parents must be notified in writing of that decision and the reasons for it and be informed that they have the right to request assessments. If the IEP team determines that additional data are needed, the district must request written, informed consent from the parent to conduct assessments. If the parent does not respond, the district may proceed with the reevaluation but must retain documentation of the attempts to communicate with the parent to obtain consent (e.g., detailed logs of telephone calls or home visits, copies of written notices).

Conclusion

The purpose of PS-RtI is to improve instructional decisions at every tier in order to maximize student outcomes. The problem-solving process is applied specific to Tier 1 instruction to adjust the core package of services delivered to all students and to result in a large percentage of students meeting benchmarks. For Tier 2 instruction, the problem-solving process is employed to determine standard protocols that are matched to the needs of small groups of students then monitored for effectiveness. Intensive instructional interventions for individual students (Tier 3) are designed, planned, and monitored as products of the problem-solving process.

Regardless of various educational decisions that are made, *teams continue to engage in problem solving to ensure that student success is achieved and maintained.* It is this continuous problem solving, in relentless pursuit of successful outcomes for our students, which characterizes the broad systems change process that P.K. is engaging in to integrate PS-RtI as a way of work for all faculty.

Section 6 - RtI

Resources

Appendix B
Problem-Solving/RtI Worksheet
(For Individual Student Concerns)

Date School
Student Grade Teacher
General description of concern:

_____
_____
_____
_____

STEP I – Problem Identification: What is the problem?
1. What is the benchmark/expected level of performance?

_____
_____
_____

2. What is the student's current level of performance? (Be sure to include data that directly assesses the target skill you want the student to perform.)

_____
_____
_____

3. What is the peer level of performance?

_____
_____
_____

4. What percentage of students in the classroom demonstrate this discrepancy?
_____

5. Gap Analysis:
Benchmark &
Student_____
Benchmark & Peer

_____

Peer & Student

_____

6. What is the replacement behavior or target skill? (measurable, observable, reportable)
_____

_____

7. At what tier will this problem be addressed? (circle one) Tier 1, Tier 2, Tier 3

8. Do we have enough information to complete Problem Identification?
_____
If yes, go to Problem Analysis.
If no, what information is still needed?
_____
_____

When will we meet again?
_____

STEP II: Problem Analysis: Why is it occurring?

Replacement behavior or target skill
_____
Based on available data (gathered through review, interview, observation, testing), why do you think the replacement behavior is not occurring and what is the predicted result of actions you might take?

Below, record each hypothesis for why the replacement behavior is not occurring along with its matched prediction statement. Provide any data used to validate or refute each hypothesis, and circle Yes to indicate that the data supported the hypothesis or No to indicate that it did not.

Hypothesis	Prediction Statement
(*What are the most likely reasons this problem is occurring? – address potential domains of instruction, curriculum, environment, learner*)	(*Based upon what we've learned, what could be changed about the instruction, curriculum, and/or environment in order to enable the student to learn?*)

"The problem is occurring because_____." "If _____ would occur, then the problem would be reduced."

Hypothesis 1:
_____
_____

Prediction Statement 1:
_____
_____

Relevant Data:
_____
_____ Validated
Yes/No

Hypothesis 2:
_____
_____

Prediction Statement 2:
_____
_____

Relevant Data:

_____

_____ Validated

Yes/No

Hypothesis 3:

_____

_____

Prediction Statement 3:

_____

_____

Relevant Data:

_____

_____

Validated Yes/No

Hypothesis 4:

_____

_____

Prediction Statement 4:

_____

_____

Relevant Data:

_____

_____

Validated Yes/No

Do we have enough information to complete Problem Analysis?

_____

If yes, go to Intervention Implementation

        If no, what information is still needed?

_____

Step III: Intervention Implementation: What are we going to do about it?
Comprehensive Intervention Plan Worksheet

Who is the intervention plan being developed for?

What is the replacement behavior/target skill?

What is the expected level of performance?

What is the current level of performance?

Verified Hypotheses	Intervention Plan	Support Plan	Monitoring Fidelity	Monitoring Plan for Determining Student Progress
	Who is responsible? What will be done?	Who is responsible? What will be done?	Who is responsible? What will be done?	Who is responsible? What data will be collected and how often? How will we decide if the plan is effective?
	When will it occur?	When will it occur?	When will it occur?	
	Where will it	Where will it	How will data be	

	occur?	occur?	shared?	

Step IV – Response to Instruction/Intervention: Is the plan working?

Is the response to instruction/intervention Positive ___, Questionable ___, or Poor ___?

1. If Positive:
        Continue current instructional supports.
        Adjust goal upward.
        Fade supports.

Comments/Actions: _____

2. If Questionable:
        Was intervention/instruction implemented as planned? Yes__ No__
        If no, what strategies will be utilized to increase implementation?
        If yes, should intervention intensity be increased? Yes ___ No____

Comments/Actions: _____

3. If Poor:
        Was intervention/instruction implemented as planned? Yes___ No____
        If no, what strategies will be utilized to increase implementation?

        If yes, was instruction/intervention aligned with the verified hypothesis, or is there other aligned instruction/intervention to consider?

        Are there other hypotheses to consider?

        Was the problem identified correctly?

Comments/Actions: _____

Florida's Resources for Problem-Solving and Response to Instruction/Intervention

- Assessments, Checklists, and Forms http://floridarti.usf.edu/resources/tools/assessments/index.html
- Parent Information Brochure http://www.florida-rti.org/RtI-Parent-Brochure.pdf
- Introductory RtI Online Course http://www.florida-rti.org/introCourse/
- iTunes U (RtI Intro Series) http://floridaitunesu.org/
- Positive Behavior Support Site http://flpbs.fmhi.usf.edu/index.asp
- PS/RtI Newsletters Highlighting Lessons Learned http://floridarti.usf.edu/resources/newsletters/index.html
- PS/RtI Pilot and Statewide Training Site http://floridarti.usf.edu/index.html
- RtI State Implementation Plan http://www.florida-rti.org/RtI.pdf
- Sample FL District Implementation Plans http://floridarti.usf.edu/resources/tools/implementationplans/index.html
- State website http://www.florida-rti.org/index.htm

National Resources for RtI Implementation and Strategies

- IDEA Partnership http://ideapartnership.org
- Intervention Central http://www.interventioncentral.org
- National Center on Student Progress Monitoring http://www.studentprogress.org
- Resource and Training Webinars from The National Center on Response to Intervention www.rti4success.org
- RtI Action Network http://rtinetwork.org
- What Works Clearinghouse http://ies.ed.gov/ncee/wwc

Resources for Effective Teaming

- Florida Positive Behavioral Support Effective Coaching http://flpbs.fmhi.usf.edu/Effective%20Coaching/1.%20Effective%20Coaching.pdf
- Intervention Central: School Based Intervention Team Resources http://www.lefthandlogic.com/htmdocs/interventions/sbit.php
- RtI Action Network: The RtI Data Analysis Teaming Process http://www.rtinetwork.org/Essential/Assessment/Data-Based/ar/TeamProcess
- The Colorado Department of Education Response to Intervention (RtI) Problem-Solving

Consultation Process
http://www.cde.state.co.us/RtI/downloads/PDF/RtI_VideoGuide.pdf

Resources for Parent Information

- Florida Response to Intervention
  http://www.florida-rti.org/Partnership/involvement.htm

- National Center on Response to Intervention (RtI) – RtI Stakeholders: Families
  http://www.rti4success.org/index.php?option=com_content&task=blogcategory&id=12&It
- National Research Center on Learning Disabilities (NRCLD)
  http://www.nrcld.org/rti_practices/parent.html
- RtI Action Network
  http://www.rtinetwork