

MULTITIERED SYSTEMS OF SUPPORT

Recommendations for Elimination of Barriers to Implementation with Fidelity in California



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Multitiered Systems of Support (MTSS):

Recommendations for Elimination of Barriers to Implementation with Fidelity in California

Federal laws (e.g., No Child Left Behind [NCLB]), Individuals with Disabilities Education Act [IDEA]), and policies (e.g., Investing in Innovation Funds) highlight the importance of implementing scientifically-based practices in schools. Research suggests that to durably implement and sustain scientifically-based practices, they should be part of a schoolwide, multitiered system of supports (MTSS; Sugai, 2012). MTSS is a method for systemically providing interventions that are proportional to students' needs. (Sugai and Horner. 2009, p.226) identified the following defining features of MTSS:

1. Interventions supported by scientifically-based research.
2. Interventions organized along a tiered continuum that increases in intensity (e.g., frequency, duration, individualization, specialized supports, etc.)
3. Standardized problem-solving protocol for assessment and instructional decision making.
4. Explicit databased decision rules for assessing student progress and making instructional and intervention adjustments.
5. Emphasis on assessing and ensuring implementation integrity.
6. Regular and systematic screening for early identification of students whose performance is not responsive to instruction.

Response to Intervention (RtI)¹ and Schoolwide Positive Behavior Support (SWPBS) are two MTSS approaches that share these features. Because, on a national level, RtI was originally developed as an alternative to the cognitive-achievement discrepancy criteria for identifying Specific Learning Disabilities (SLD; IDEA, 2004), it is most closely associated with academic interventions, and SWPBS, as its name suggests, is directed at increasing students' prosocial behaviors. Many suggest, however, that RtI and SWPBS are complementary and, therefore, can be implemented conjointly within a MTSS (Gamm et al., 2012).

The first characteristic of MTSS reflects the emphasis in federal law (e.g., NCLB) and regulations on implementing scientifically-based practices. The Institute of Education Sciences (IES) publishes reviews of the scientific evidence for educational interventions and practices on the What Works Clearinghouse Web site. Unfortunately, practices for

¹ In this paper, the term RtI refers to an achievement-based MTSS and not a process for determining SLD eligibility. The term intervention-based assessment will be used to describe determining SLD eligibility based on a comprehensive evaluation of a student's response to scientific, research-based interventions.

which there is little evidence (e.g., Irlen lenses) or are contraindicated (e.g., grade retention) persist. Further, interventions that have met the gold standard in scientific research still may not be effective when applied to a specific student or groups of students. One of the most common reasons an intervention doesn't work is that it is not implemented as intended (Lane, Bocian, MacMillan, & Gresham, 2004). Thus, MTSS includes assessing intervention integrity. Because students do not benefit from interventions they don't receive, we can't assume an intervention failed and a more intensive intervention is required if we don't have evidence of the integrity with which it was implemented.

'Multiple tiers' is the feature most often associated with MTSS. It is commonly represented as a pyramid. A different analogy might be one of body weight. A healthy diet and exercise are sufficient for many people to maintain healthy weight (Tier 1); those who need more structure or coaching to achieve a healthy weight may enroll in a program like Weight Watchers or Jenny Craig (Tier 2); a very small portion of people require the most intensive weight loss interventions such as a LAP-BAND or gastric bypass (Tier 3). In MTSS, Tier 1 is effective universal instruction and positive behavioral supports in general education; Tier 2 is small group instruction delivered via standard protocol or individualized problem solving; and Tier 3 is more intensive, delivered with a smaller student-to-teacher ratio often by a specialist targeting very specific skills (Burns, Jacob & Wagner, 2008). In the weight-loss analogy it is easy to see that Tier 1 interventions (healthy diet and exercise) remain critical to reaching the goal of a healthy weight even when Tier 2 or Tier 3 interventions are applied. Likewise, the tiers in MTSS are cumulative rather than exclusionary. The application of multiple tiers of intervention differs from traditional tracking because it is more dynamic. Interventions are adopted or discontinued based on student progress, which in turn is monitored more frequently when more intensive interventions are applied. Thus, there is no Tier 2 or Tier 3 "student" in MTSS; there is a continuum of interventions ideally matched to student needs.

Like controlling one's weight, academic and behavioral skills occur along a continuum. Most students benefit from high quality general education instruction (Tier 1), while some require interventions in the short term, and others require sustained actions through a lifetime to achieve a desired goal. Also like obesity, the cause of academic and behavioral deficits can be internal to the student (e.g., disability, genetic predisposition, etc.), environmental, or one of countless potential interactions between/within the child and environmental factors. MTSS does not dwell on the causes of a deficit, particularly if they may be internal and unalterable. The one exception is the acknowledgement that significant learning deficits are often associated with earlier learning difficulties. This is known as the "Mathew Effect" -- students' academic delays are compounded with time. If early learning difficulties are left untreated, it becomes increasingly difficult for students to access the general education instruction and curriculum. One goal of MTSS is to identify students who are not profiting from instruction as soon as possible through routine screenings. MTSS implementation requires schoolwide benchmarks collected at least three times a year to identify students at risk for failure; interventions proportional

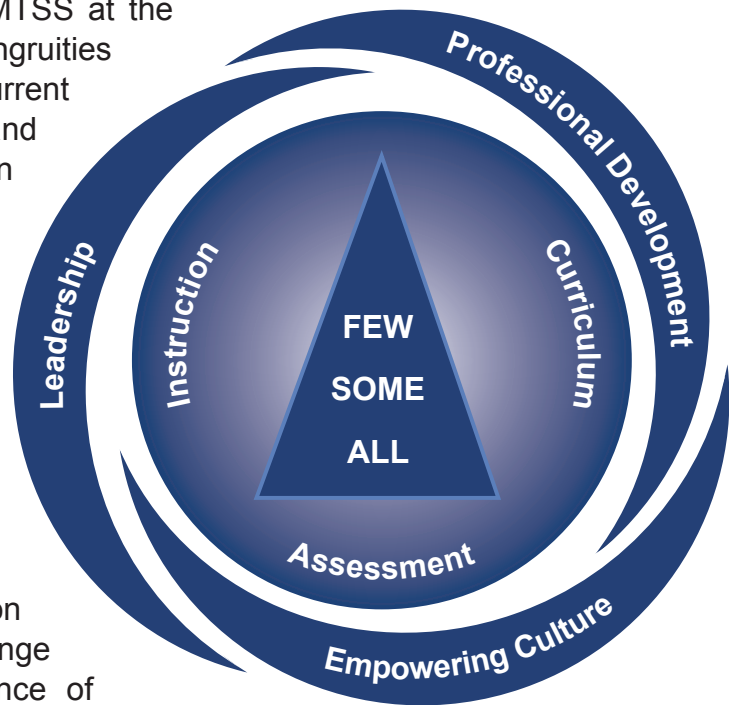
to the level of student need are applied; and the quality of services are examined at each tier. Explicit databased decision rules are applied to determine when students are in need of more intense interventions. Problem solving is used to develop increasingly intense interventions and analyze the quality of instruction, behavioral supports, and MTSS as a whole. To judge the quality of MTSS, implementation teams examine benchmark and other data to determine if identified systems-level goals are being achieved and either apply implementation science to continue momentum toward those goals or adjust if sufficient progress has not been made (Griffiths, Parson, Burns, VanDerHeyden, & Tilly, 2007). For example, meaningful goals an MTSS implementation team may target include reducing the number of students referred for special education eligibility assessments, decreasing office disciplinary referrals, or improving student performance on large scale assessments.

A number of studies have found that implementing MTSS led to improvement on these meaningful student outcomes. For example, in just two years, implementation of an RtI model to Reading First programs in Florida resulted in an 81 percent reduction in the number of students found eligible for special education in kindergarten, and a 67 percent and 53 percent eligibility reduction in first and second grades (Torgeson, 2007). These results mirror a growing concern that special education identification rates have more to do with whether schools provide quality instruction and a databased, tiered approach to intervention than the actual presence of a learning disability (Burns et al., 2010; Kerns & Fuchs, 2013). RtI also has been found to reduce ethnic and racial disproportionality in special education identification (Marsten, Muyskens, Lau, & Canter, 2003). Similarly, implementation of SWPBS has been found to dramatically reduce office disciplinary referrals (Vincent & Tobin, 2011). Further, SWPBS was found to reduce both the number and the overrepresentation of African American students in office disciplinary referrals (Vincent, Swain-Bradway, Tobin, & May, 2011). A review by Burns, Jacob and Wagner (2008) found that additional benefits of MTSS include increases in school performance on statewide accountability tests, decreases in grade retention, improved reading skills, and increased time on task.

With such promising results, it is easy to wonder why MTSS has failed to be adopted by California schools. There are a number of possibilities that will be introduced here and explored in depth throughout this paper based on the MTSS literature, an analysis of state and local policies, and our own observations of various districts' attempts to implement MTSS. One of the initial challenges is a lack of data on statewide MTSS implementation. A systematic assessment (beyond self-report by a selective group) of which schools and LEAs are implementing MTSS and what they need for full implementation or sustainability would be useful for establishing a baseline against which any future attempts to support MTSS can be measured. Other challenges identified include school level beliefs and practices, legislative priorities and restrictions, credentialing and pre-service preparation, leadership and support at the state and local levels, competing initiatives, and the use of RtI for SLD identification. Potential solutions for overcoming these barriers are provided.

School Level

Barriers to the implementation of MTSS at the school level may stem from incongruities between school personnel's current knowledge, skills, and beliefs and those required for full implementation of MTSS with fidelity. For example, school personnel may not possess the knowledge and skills to implement MTSS (i.e., a skill deficit), or may not see the need to implement MTSS (i.e., motivation deficit) because they are satisfied with current practices, don't think MTSS will make a difference (i.e., just another fad), or believe MTSS is exclusively a special education program. Much of the systems change research emphasizes the importance of establishing a need for change among major stakeholders before proceeding (Sugai, Horner, Fixsen, & Blasé, 2010). Another example is when school personnel believe they are fully implementing MTSS but in fact have only established a limited practice such as fall, winter, and spring benchmarking or the appointment of an Rtl specialist. Thus, a few MTSS features may be established but the reallocation of resources into a coherent schoolwide systems approach has failed to occur (i.e., partial implementation).



Legislative

The absence of a legislative mandate to implement MTSS is a major barrier to implementation in California schools. Although NCLB (2001) and IDEA (2004) both require elements consistent with MTSS, such as implementation of evidence-based instruction, the State Legislature, which has sole authority to establish state priorities, has not authorized nor publicly endorsed MTSS. A legislative mandate may prompt the allocation of necessary resources to LEAs for implementation and could support monitoring to ensure sustainability by the State Department of Education. Establishing MTSS as a legislatively directed, statewide mandate, similar to the state's adoption of Common Core State Standards (CCSS), may mitigate LEA-perceived barriers to MTSS implementation. These barriers include a lack of resources, buy-in, and justification for MTSS adoption.

Under the current school finance system it may be difficult for LEAs to justify the expenditure of dollars on implementation and/or scaling-up of MTSS. The delivery of services and supports to students in a MTSS model (e.g., RtI, SWPBS) is based on achievement and/or behavioral needs rather than demographics. While specific student populations have unique educational needs, there is much overlap in the instructional needs of students across target populations, as well as in their response to evidence-based programs (Fletcher, Lyon, Fuchs, Barnes, 2007). The existing school finance structure, with its complex categorical formulas and rules, may hinder LEAs from adopting MTSS as a continuum of supports for all learners. Governor Brown's recent Local Control Funding Formula proposal would relax some categorical spending restrictions and increase local decision making power, which, in turn, could lead to more LEAs investing in the implementation of MTSS. However, some opponents of the Local Control Funding Formula assert that spending requirements for some populations, such as English learners and children in poverty, need to be strengthened to ensure that funds translate into additional services for target student groups (Legislative Analyst's Office, 2013). One possibility for supporting LEA adoption of MTSS is to counterbalance the reduction of restrictions in which funds can be applied to particular programs or populations with the requirement that evidence-based programs be selected and implemented within an overall MTSS model.

Another legislative barrier to implementation of MTSS is limiting resource specialists (RS) to a case load of 28 students, as codified in California Education Code 36362(c), and prohibiting them from serving as both RS and a teacher assigned to a general education class. RS teachers can serve many important functions within a MTSS model including teacher consultant, interventionist to students with and without IEPs, and coteacher in general education classrooms. The restriction to 28 students is a major barrier to utilizing

RS teachers in MTSS as they are not permitted to provide intervention to students who may need their level of expertise. Further, if MTSS lowers special education identification rates, RS teachers may be required to cover additional schools to maintain a caseload of 28 students, thus watering down their potential impact on struggling learners. The school and clinical training of RS teachers make them ideal candidates to serve on MTSS implementation teams as well as assist with progress monitoring, provision of scientifically-based interventions, and assessment of intervention integrity. Allowing LEAs and school sites to determine how best to allocate this asset based on individual school needs and structures is consistent with a MTSS.

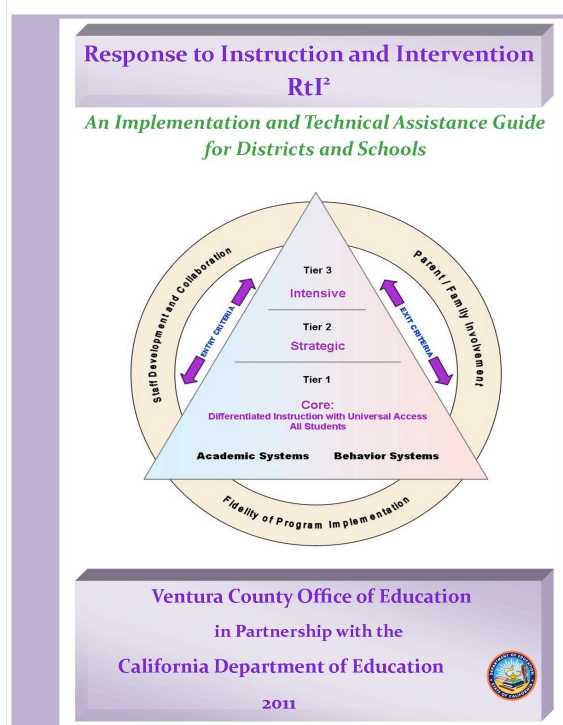
Credentialing and Pre-Service Preparation

Another major barrier to LEA implementation of MTSS is a lack of staffing flexibility to provide a continuum of support to students, a foundation of MTSS. California Education Code Section 44253.1 stipulates that “An individual must hold a credential or authorization appropriate to the assignment, or be otherwise legally authorized to serve on the basis of a local assignment option in another section of statute” (p. 13; CTC, 2012). Unlike in other states, the education specialist credential does not authorize the provision of instructional services to general education students. According to the Commission on Teacher Credentialing (CTC; 2012), it is not just the population of students the individual is teaching that determines the authorization a teacher must hold, but the setting, duration, academic content, and grade levels. CTC, in response to questions and concerns from LEAs regarding assignment options for special education teachers within MTSS, provides complicated staffing options that include consultative teaching options, team teaching, content based interventions, and study skills classes.

The Educator Excellence Task Force (EETF) echoed concerns regarding the limited service delivery options of education specialist credential holders in its report “Greatness by Design” (2012). It recommends that “All educators (general educators, special educators, and bilingual educators) should share a common base of preparation in general education by completing a common set of courses based on a common set of standards prior to specializing” (EETF; pg. 39). Specialization could be advanced preparation in providing intensive evidence-based instruction, intervention, and support to increase basic literacy and math skills (e.g., elementary level), or increase access to content area instruction (e.g., secondary level). Because special education teachers are tasked with the responsibility of ensuring students with disabilities have access to the general education curriculum (IDEA, 2004), and are accountable for the performance of these students on accountability assessments aligned with the general education curriculum, it makes sense to restructure the current education specialist credential to include a common foundation. Concerns regarding the shortage of special education teachers will undoubtedly lead to heated discussions regarding the negative effects of additional training requirements on the recruitment and retention of special education teachers. However, research using large-scale databases indicates that extensive preparation may mitigate special education teacher attrition (Boe, Cook, & Sunderland, 2008; Boe, Shin, & Cook, 2007). For example, Boe, Cook, and Sunderland (2008) found that pre-service teachers who had at least 10 weeks of student teaching, completed coursework in educational psychology, and observed others’ classroom instruction were significantly less likely to leave the profession than those who completed a less comprehensive preparation program. Therefore, it is recommended that legislative changes regarding credential restrictions be considered for successful MTSS implementation.

Leadership

The State Department of Education holds an important role in facilitating policy-level changes and providing leadership to support the implementation of MTSS. A number of states, including California, have provided guidance to LEAs in the form of implementation guides. However, states considered most successful in achieving statewide fidelity of implementation go beyond providing guidance on MTSS implementation; rather a statewide implementation plan is developed and disseminated to LEAs and key stakeholders. For example, the Illinois State Response to Intervention Plan (2008, January) includes a detailed explanation of MTSS and its components, are compatible with state and federal initiatives, state department of education activities to support MTSS implementation, implementation timeline, and potential funding sources. Similarly, Florida's Statewide Response to Instruction/ Intervention Implementation Plan (2008) includes a description of MTSS within the context of existing state initiatives; efforts to support MTSS at the state level such as state-funded projects, partnerships, and professional development; and necessary changes in state infrastructure such as establishing a state management team to enact policy, creating state transformation teams to monitor district implementation and provide support to LEAs, and forming a state advisory group to provide ongoing stakeholder input.



In contrast, California's MTSS guide, Response to Instruction and Intervention (RtI 2): An Implementation and Technical Assistance Guide for Districts and Schools (2011), provides little information regarding state department activities to assist and support LEAs in making MTSS a reality. Although the guide provides accurate information regarding basic MTSS terminology and foundational concepts, the guide is primarily informational. According to the document, LEAs are encouraged to complete the RtI2 Implementation Self-Assessment and use the data to develop an RtI2 Implementation Action Plan; however, unless LEA or school personnel are quite knowledgeable of the research literature on MTSS or immerse themselves in the 50-plus Web sites referenced in the document, the

self-assessment will be completed inaccurately or not at all. In comparing California's MTSS guide to that of other states that are successfully implementing MTSS, it is clear that the guide falls short in:

1. linking MTSS with specific state initiatives;
2. establishing an implementation timeline;
3. proposing potential funding sources; and
4. offering state support to assist in implementation.

Increasing MTSS implementation with fidelity in California may include developing an MTSS implementation plan. The Common Core State Standards Systems Implementation Plan for California (2012, October) is a good example of a guiding document and implementation plan for CCSSS. The CCSSS document includes a timeline for implementation, state-specific resources and implementation activities, and implementation indicators. Establishing MTSS as a legislatively-directed, statewide initiative, similar to CCSSS and Linked Learning, and connecting it to other state initiatives and priorities may increase LEA buy-in and justify allocation of resources for implementation. To monitor LEAs ongoing efforts to implement MTSS, Federal Program Monitoring reviews could be used as an accountability measure to ensure LEAs meet fiscal and state MTSS implementation requirements. Using a common MTSS terminology across related initiatives and task forces, as well as collaboration across California Department of Education divisions (e.g., Curriculum and Instruction; Professional Development; Specialized Programs such as English Learners, Special Education, and State Special Schools) also could serve to increase understanding of the conceptual framework of MTSS as a Statewide Department of Education model for allocating resources based on need.

The provision of statewide coordinated technical assistance (TA) is key to building the capacity of LEAs in implementing MTSS with fidelity. TA is an individualized approach to building an entity's capacity for quality implementation of innovations, usually following training (Chinman et al., 2005). However, Fixsen, Blasé, Horner, and Sugai (2009) note that TA is also needed for creating readiness to change when new knowledge, skills, and abilities are required and changes need to occur at multiple levels to support and sustain the change. States that are successfully implementing MTSS provide a wide range of TA opportunities. For example, the Illinois department of education provides technical assistance to LEAs through application to the Illinois RtI Network where LEAs receive training, technical assistance, and coaching. Individuals are also recruited to receive intense training as part of a cadre of external coaches across Illinois who train and support district and school teams and internal school coaches. The Oregon RtI Initiative project provides intensive training and resources to Oregon school districts "based on the district's willingness (commitment on the part of district leaders to move to a Response to Intervention system) and readiness (have the foundational elements of a research-based core curriculum and universal screener in place)" (Oregon RTI Initiative 2013-2014

Application, p. 1.). In New York, the state education department established the New York State Response to Intervention Technical Assistance Center (RtI-TAC) at the State University College at Buffalo to “promote and build school district capacity to implement a systemic, response to intervention process.” Several states also offer State Personnel Development Grants to LEAs, in partnership with Institutes of Higher Education (IHEs), to support training and professional development in MTSS.

Recent and past reviews of the CDE Web site have resulted in minimal evidence of the provision of statewide TA or state-level funding to support the capacity of LEAs to adopt and implement MTSS with fidelity. Legislatively-funded, CDE-supported TA is needed for statewide adoption of MTSS. The intensity of the TA will depend on a number of factors including:

1. district/school awareness and level of knowledge of MTSS;
2. existing skill repertoires;
3. discrepancy between current practice and MTSS; and
4. current attitudes toward and beliefs about MTSS (Wallace, Blasé, Fixsen, & Naoom, 2008).

The State Implementation and Scaling-up of Evidence-based Practices (SISEP) Center, a national technical assistance center funded by the U.S. Department of Education, has a wealth of information for developing a state TA plan for scaling-up innovations such as defining and prioritizing state levels of TA; examining fit with current state priorities and infrastructure; and identifying existing and needed resources and expertise. The research evidence is clear that to implement a new innovation with fidelity, high quality, sustained professional development that includes opportunities to practice and collaborate, with embedded support (e.g., coaching) and continuous feedback is necessary (Kretlow & Bartholomew, 2010). Developing state and LEA partnerships with faculty from IHEs who are well-versed in the MTSS literature, have knowledge and experience working in schools at a systemic level, and have school-based experiences in implementing features consistent with MTSS is recommended. Additionally, to ensure accountability, ongoing evaluation (e.g., benchmarks) of desired outcomes to inform MTSS implementation and TA effectiveness is suggested.

MTSS and Common Core State Standards

The adoption of the Common Core State Standards (CCSS) may facilitate implementation of MTSS if it is viewed as a complementary rather than competing initiative. The Council of the Great City Schools released a report in 2012 that asserted MTSS, when implemented with fidelity, can significantly increase the proportion of students who meet the CCSS as well as reduce overrepresentation of racial/ethnic minorities and English Language Learners in special education (Gamm, et al., 2012). While MTSS (under the California Department of Education name of RtI2) has been around much longer, CCSS has received much more attention in California. For example, the California Department of Education published a report describing RtI2 as part of SLD identification in 2009 followed by a 2011 report describing RtI2 as a framework for the delivery of instruction and interventions to all students. Both reports provide useful information for implementing MTSS, including suggestions for district, site, and classroom practices and a self-assessment tool. However, these documents are guides and not plans and do not outline state support for implementation.

In contrast, the CCSS Systems Implementation Plan for California published in October, 2012 provides a detailed timeline of statewide and LEA activities to prepare for implementation of CCSS. Because implementation of CCSS includes adopting a new high-stakes, statewide test based on the CCSS by 2015, districts are likely to engage in activities detailed in the plan to avoid disappointing test scores. Therefore, CCSS may actually lead to greater implementation of MTSS if the instructional resources, professional development, and modifications to teacher preparation and beginning teacher support programs promote mastering CCSS in a MTSS. If MTSS is not a core component of CCSS implementation, it will likely be seen as a competing and irrelevant school reform initiative. A search for the term RtI2 in the CCSS plan found only one reference on page 31 in a list of other school improvement programs. Therefore, it is recommended that more of the ongoing work around CCSS begin to incorporate the core components of MTSS as identified by the RTI2 document (CDE, 2011).

MTSS and Student Assessment

One of the core components of MTSS is assessment and data collection, including screening all students to determine who needs differentiated instruction and monitoring. State test results may be considered in this screening, though students younger than third grade are not included in the Smarter Balanced program slated to be implemented in 2015. The Smarter Balanced system includes optional interim assessments and formative assessments available through a digital library of professional development tools. It is possible that the interim assessments may act as benchmark assessments, and the formative assessments might be used for progress monitoring. If the Smarter Balanced assessments meet the following criteria as an adequate progress monitoring measure, as identified by Fuchs and Fuchs (1999), they may be very useful for implementing MTSS in California:

1. sufficient evidence of reliability and validity;
2. capacity to model growth (i.e., multiple alternate forms that allow comparison across administrations and sufficient range of skills measured to avoid floor and ceiling effects for students with poorly or highly developed skills);
3. identified benchmarks for expected growth to set a selection criterion;
4. treatment sensitivity (i.e., small gains in skill acquisition are detected, and gains can be compared to average growth rates to determine whether sufficient progress is being made);
5. capacity to inform teaching;
6. independence from a specific instructional strategy or curriculum (i.e., assessments should measure tasks functionally equivalent to the material that has been directly taught and practiced, but the items themselves should be novel); and
7. feasible (i.e., easy to administer; takes a short amount of time to administer, score, and interpret).

Further, the measures should have appropriate levels of specificity (true negative) and selectivity (true positive) so limited resources are not diverted to students who do not actually need intervention, and students who need intervention are identified accurately.

If the Smarter Balanced assessment system does not meet these criteria, and to accommodate students in K-3 grade, LEAs could implement one of the many assessment systems that meet the measurement standards described above including:

1. STAR assessments from Renaissance Training Center (www.renlearn.com);
2. Formative Assessment for Teachers (fast.cehd.umn.edu); and
3. Dynamic Indicators of Basic Early Literacy Skills (dibels.uoregon.edu).

It is relatively inexpensive for districts to develop their own in-house assessments, but without scientific evidence that the measures meet the above criteria, interpretations of such measures are questionable and can dilute movement toward MTSS. For behavioral MTSS, the Behavioral and Emotional Screening System (Kamphaus & Reynolds, 2007) may be useful for universal screening at Tier 1. AIMSweb Behavior measures can be customized to monitor behavior related to school-specific behavior expectations at Tier 1 and specific target behaviors at Tier 2 or 3. The Schoolwide Information System (SWIS), a Web-based, schoolwide data collection system, is designed to help school personnel use office referral data to design schoolwide and individual student interventions. A significant barrier to implementing MTSS with fidelity is that most LEAs in California have not implemented a benchmark and progress monitoring system that meet these quality standards. More often instructional and disciplinary decisions are made based on anecdotal data, informal assessments, or district-developed assessments with unknown reliability or validity. The quality of the databased decisions that drive MTSS is jeopardized by collecting bad data (i.e., garbage in, garbage out).

Generalizing Success of Behavioral MTSS to Academic MTSS

The purpose of Schoolwide Positive Behavior Support (SWPBS) is to reduce disruptive behaviors and increase student achievement and social competencies. Features of a behavior-focused MTSS include all the same elements as an academically-focused MTSS, including schoolwide expectations and procedures for teaching expectations; a continuum of procedures to encourage schoolwide expectations and discourage problem behaviors; and use of data to monitor the impact of SWPBS implementation (Coffey & Horner, 2012, p.410). Coffey and Horner found that among 116 schools that implemented SWPBS for at least three years, administrator support, communication, and databased decision making were most highly associated with the sustainability of SWPBS. The most frequently identified implementation features required for implementation of SWPBS with fidelity over time included leadership at the district and school level, followed by teacher buy-in and commitment. Educators identified lack of resources in the form of funding and/or insufficient personnel time to meet regularly and complete all SWPBS activities as the two most common barriers.

By many indicators, SWPBS is implemented in more schools in California and with greater fidelity than the academic version of MTSS (i.e., RtI2). For example, the sixth annual RtI2 conference, hosted by the Orange County Department of Education, held more sessions on SWPBS than RtI2. More than 600 schools in California have adopted SWPBS (Horner, 2013), but it is unknown how many schools have implemented RtI2. One reason for the relatively more widespread adoption of SWPBS in California may be that a number of proven programs exist to help schools and districts implement and sustain SWPBS. For example, Safe and Civil Schools provides extensive technical manuals, data collection resources and on-site technical assistance to schools attempting to implement their version of SWPBS. Similarly, the California Technical Assistance Center on PBIS (Cal-TAC) provides professional development and TA to help schools build capacity to adopt and sustain SWPBS. Therefore, greater technical assistance for implementing academic MTSS may promote more widespread use of RtI2. Another advantage to SWPBS adoption in California is that it has never been connected to special education eligibility criteria. While SWPBS implemented with integrity is associated with decreased special education identification rates (Cheney et al., 2010; Eber et al., 2009), it was never mired in a debate about how an individual student's response to a continuum of procedures to increase prosocial behaviors and decrease problem behaviors would inform special education eligibility decisions. Uncoupling RtI2 from the SLD eligibility debate may increase the

buy-in of general education personnel. Lastly, the adoption of SWPBS in California may have benefited from a lack of competition considering that many schools had either no schoolwide program in place or relied on some type of unproven and oftentimes ineffective 'character education' or 'zero tolerance' program to address student behavior. The dramatic effects of a systematic, proactive behavioral system may have fanned SWPBS's popularity. Conversely, there are a myriad of academic instructional programs (e.g., Open Court, Reading Recovery, Lindamood-Bell) in place at schools, which may have led to the assumption that RtI2 is just another fad rather than a systemwide approach to redistributing resources to produce demonstrable outcomes for all students.

Models for Identification of SLD and Implications for MTSS

Currently, there is considerable debate in California and the nation regarding the best way to identify SLD among students with pervasive achievement problems. While there is consensus that the process should begin with an academic MTSS (i.e., RtI) and end with a comprehensive evaluation, there are two competing ideas about what that comprehensive evaluation would entail. The 2010 Learning Disabilities Association of America's White Paper on Evaluation, Identification, and Eligibility Criteria for Students with Specific Learning Disabilities summarizes one side of the debate--patterns of Processing Strengths and Weaknesses (PSW)--by advocating for cognitive testing to determine whether a student meets SLD criteria or why a student failed to respond to interventions. The rebuttal, offered by the Consortium for Evidence-Based Early Intervention Practices (2010), promotes intervention-based eligibility decision making (IBE) over PSW, citing a lack of empiricism in claims supporting PSW as well as a conflict of interest among the pro-PSW advocates. PSW supporters assert that cognitive processing assessment results will lead to cognitive-based interventions that are superior to the skill-based interventions derived from intervention-based assessment results. Although convergent research disputes this claim (Arter & Jenkins, 1979; Kearns & Fuchs, 2013), the professional debate over whether PSW is a suitable method for determining SLD eligibility continues.

Intervention-based assessment for SLD eligibility can be conducted even when MTSS is not in place by using short-term empiricism to test various interventions. Although MTSS is congruent with and supports intervention-based special education eligibility decision making, it is not sufficient for making SLD eligibility decisions. A comprehensive assessment that includes consideration of current and expected growth rates, intervention fidelity, local achievement norms, functional assessments of academic skills, and exclusionary conditions, to name a few, must be conducted before an IEP team determines that a student qualifies to receive special education services. Thus, the goal of a comprehensive assessment is to determine a student's level of need and the conditions most likely to improve his or her performance based on the student's response to the demands of the curriculum and attempts to help him or her.

Adopting an intervention-based SLD eligibility process would free personnel resources, such as school psychologists and RS teachers, to support school and district adoption of MTSS. School psychologists could devote more time to intervention development and assessments and less time administering lengthy cognitive and processing tests. The national Future of School Psychology Conference (October, 2012) focused on a

need “for school psychologists to reduce their emphasis on traditional special education eligibility assessments and focus more on assessment activities that are linked directly to interventions within the context of a multitiered, public health approach to service delivery” (Castillo, Curtis, & Gelley, 2012. p.5). Fagan (2008) noted that school psychologists are unlikely to modify their practices to support MTSS if they are not provided considerable on-the-job mentoring and training. Further, he suggested school psychology training programs need to provide specific MTSS-related fieldwork placements and activities to promote the development of these skills among their graduates. As directors of two consecutive OSEP-funded training grants to promote MTSS skills among our school psychology candidates, we can attest to the difficulty in finding practica and internship placements in schools where our candidates can learn from and contribute to the implementation and sustainability of a school’s MTSS. Establishing partnerships between IHEs and LEAs may be an avenue for providing technical assistance to schools in the implementation of MTSS, while also serving as a training ground where pre-service teachers, administrators, and related service providers complete student teaching and required fieldwork experiences.

The California State Board of Education (SBE) may consider amendments to regulations on SLD identification processes in the near future. As the regulations governing SLD identification are reviewed for potential changes, several options are being considered such as: (1) RtI2, (2) RtI2 plus PSW, and (3) RtI with cognitive/achievement discrepancy. In the absence of a strong MTSS, eligibility decisions for the latter two options will likely focus on PSW or cognitive/achievement discrepancy, which lack empirical support for improving student outcomes. We recommend the state adopt intervention-based eligibility criteria in order to promote implementation of MTSS for all learners, including those suspected of having a specific learning disability.

Conclusions and Recommendations for Consideration

The identified barriers to MTSS adoption in California schools provide a snapshot of the challenges to systemwide school reform, and the infrastructure necessary for implementation. A summary of recommendations for consideration follows.

- Conduct a statewide needs assessment of the extent to which LEAs are currently implementing MTSS and identify needs for full implementation and sustainability.
- Enact legislation to adopt MTSS as a statewide model of education and prioritize funding for technical assistance to LEAs.
- Provide technical assistance to assist LEAs in creating readiness for change and to support the knowledge acquisition, skill mastery, and implementation fidelity necessary for successful MTSS implementation.
- Require ongoing evaluation (e.g., benchmarks) of LEA implementation of MTSS to inform implementation and effectiveness of state-funded technical assistance.
- Reduce funding restrictions to specific populations and programs with the requirement that MTSS be adopted to provide a continuum of services based on student need.
- Allow LEAs and schools the flexibility to assign credentialed personnel to classrooms and programs based on individual school needs.
- Develop a statewide MTSS implementation plan, similar to California's Common Core State Standards implementation plan, with established benchmarks by which to gauge progress.
- Use a common MTSS terminology across related initiatives and task forces.
- Collaborate across CDE divisions to increase understanding of MTSS, provide a model for collaboration between departments (e.g., English Language Development, Curriculum and Instruction, Special Education, Assessment and Accountability), and establish commitment to implementation of MTSS at a statewide level.
- Implement CCSS within a framework of MTSS to ensure all students have an evidence-based system of instruction to assist them in achieving success.
- Uncouple California's RtI2 process from SLD eligibility to increase buy-in from general education personnel.
- Adopt SLD identification procedures consistent with MTSS to increase collaboration across general and special education and ensure a common system for identifying and serving diverse learners.

References

- Arter, J., & Jenkins, J. (1979). Differential-diagnosis-prescriptive teaching: A critical appraisal. *Review of Educational Research*, 49, 517-555.
- Boe, E. E., Cook, L. H., & Sunderland, R. J. (2008). Teacher turnover: Examining exit attrition, teaching area transfer, and school migration. *Exceptional Children*, 75, 7-31.
- Boe, E. E., Shin, S., & Cook, L. H. (2007). Does teacher preparation matter for beginning teachers in either special or general education? *Journal of Special Education*, 41, 148-170.
- Burns, M. K., Jacob, S., & Wagner, A. R. (2008). Ethical and legal issues associated with using response-to-intervention to assess learning disabilities. *Journal of School Psychology*, 46, 263- 279.
- Burns, M. K., Scholin, S. E., Kosciulek, S., & Livingston, J. (2010). Reliability of decision-making frameworks for response to intervention for reading. *Journal of Psychoeducational Assessment*, 28, 102-114.
- California Department of Education (2012, October). The Common Core State Standards Systems Implementation Plan for California.
- California Department of Education, Task Force on Educator Excellence (2012). Greatness by Design: Supporting outstanding teaching to sustain a golden state. Retrieved from <http://www.cde.ca.gov/eo/in/documents/greatnessfinal.pdf>
- Castillo, J.M., Curtis, M.J., & Gelley, C. (2012). School Psychology 2010: Demographics, employment, and the context for professional practices-Part 1. *Communiqué*, 40, 1, 28-30.
- Cheney, D., Lyness, L., Flower, A., Waugh, M., Iwaszuk, W., Mielenz, C., et al. (2010). The check, connect, and expect program: A targeted, tier 2 intervention in the school-wide positive behavior support model. *Preventing School Failure: Alternative Education for Children and Youth*, 54, 152-158.
- Chinman, M., Hannah, G., Wandersman, A., Ebener, P., Hunter, S.M., Imm, P., et al. (2005). Developing a community science research agenda for building community capacity for effective prevention interventions. *American Journal of Community Psychology*, 35, 143–157.

- Coffey, J. & Horner, R. (2012). The sustainability of school-wide positive behavior interventions and supports. *Exceptional Children*, 78, 407-422.
- Connelly, V. & Graham, S. (2009). Student teaching and teacher attrition in special education. *Teacher Education and Special Education*, 32, 257-269.
- Eber, L., Phillips, D., Upreti, G., Hyde, K., Lewandowski, H., & Rose, J. (2009). Illinois positive behavioral interventions & supports (PBIS) network: 2008-2009 progress report. Illinois: Illinois PBS Network
- Fixsen, D. L., Blase, K. A., Horner, R., & Sugai, G. (2009, February). Intensive technical assistance. Scaling-up brief #2. Chapel Hill, NC: The University of North Carolina at Chapel Hill, FPG Child Development Institute, SISEP
- Fletcher, J. M., Lyon, G. R., Fuchs, L. S., & Barnes, M. A. (2007). *Learning disabilities: From identification to intervention*. New York: Guilford.
- Gamm, S., Elliot, J., Wright Halbert, J., Price-Baugh, R., Hall, R., Walston, D., Uro, G. et al. (2012). Common core state standards and diverse urban students: Using multi-tiered systems of support. Retrieved from <http://www.cgcs.org/cms/lib/DC00001581/Centricity/Domain/87/77--Achievement%20Task%20Force--RTI%20White%20Paper-Final.pdf>
- Griffiths, A., Parson, L.B., Burns, M.K., VanDerHeyden, A., Tilly, W.D. (2007). Response to intervention: Research for presenters. Alexandria, VA. NASDSE: National Association of State Directors of Special Education, Inc.
- Horner, R. H. (2013). Leadership in implementing school-wide PBIS in California. Retrieved from http://www.pbis.org/pbis_resource_detail_page.aspx?PBIS_ResourceID=907
- Individuals with Disabilities Education Improvement Act, Pub. L. (2004). 108-446.
- Kamphaus, R. W. & Reynolds, C.R. (2007). Behavior Assessment System for Children-Second Edition (BASC-2): Behavioral and Emotional Screening System (BESS). Bloomington, MN: Pearson.
- Kearns, D., & Fuchs, D. (2013). Does cognitively-focused instruction improve the academic performance of low-achieving students? *Exceptional Children*, 79, 263-290.
- Kretlow, A. G. & Bartholomew, C. (2010). Using coaching to improve the fidelity of evidence-based practices: A review of studies. *Teacher Education and Special Education*, 33, 279-299.

Lane, K. L., Bocian, K. M., MacMillan, D. L., & Gresham, F. M. (2004). Treatment integrity: An essential but often forgotten component of school based interventions. *Preventing School Failure*, 48, 36-43.

Learning Disabilities Association. (2010). White paper on evaluation, identification, and eligibility criteria for students with specific learning disabilities. Pittsburgh, PA: Retrieved from: <http://www.ldanatl.org/pdf/LDA%20White%20Paper%20on%20IDEA%20Evaluation%20Criteria%20for%20SLD.pdf>

Marston, D., Muyskens, P., Lau, M., & Canter, A. (2003). Problem-solving model for decision making with high-incidence disabilities: *The Minneapolis experience. Learning Disabilities Research & Practice*, 18, 187–200.

No Child Left Behind (NCLB) Act of 2001, Pub. L. No. 107-110, § 115, Stat. 1425 (2002).

Response to Instruction and Intervention (RtI2): An Implementation and Technical Assistance Guide for Districts and Schools (2011). Author: Ventura County Office of Instruction. Retrieved from <http://www.vcoe.org/cici/ResponseToInstructionInterventionRtI/tabid/1918/Default.aspx>

Sugai, G. (2012). Multi-tiered support systems: Features and considerations. Presentation at the annual convention of the International School Psychology Association in Montreal, Quebec.

Sugai, G., & Horner, R. H. (2009). Responsiveness-to-intervention and school-wide positive behavior supports: Integration of multi-tiered system approaches. *Exceptionality*, 17, 223-237.

Sugai, G., Horner, R. H., Fixsen, D., & Blase, K. (2010). Developing systems-level capacity for RtI implementation: Current efforts and future directions. In T. Glover & S. Vaughn (Eds.), *The promise of response to intervention: Evaluating current science and practice*, 286-309. New York, NY: Guilford Press.

The Consortium for Evidence- Based Early Intervention Practices (2010). A response to the Learning Disabilities Association of America white paper on specific learning disabilities (SLD) identification. Retrieved from: http://www.isbe.state.il.us/spec-ed/pdfs/LDA_SLD_white_paper_response.pdf

Torgeson, J. (2007). Using an RtI model to guide early reading instruction: Effects on identification rates for students with learning disabilities. *Florida Center for Reading Research*. Retrieved from: http://www.fcrr.org/science/pdf/torgeson/Response_intervention_Florida.pdf

Vincent, C. G., Swain-Bradway, J., Tobin, T. J., and May, S. (2011). Disciplinary referrals for culturally and linguistically diverse students with and without disabilities: Patterns resulting from school-wide positive behavior support. *Special issue of Exceptionality*, 19, 175–190.

Vincent, C. G., & Tobin, T. J. (2011). An examination of the relationship between implementation of schoolwide positive behavior support (SWPBS) and exclusion of students from various ethnic backgrounds with and without disabilities. *Journal of Emotional and Behavioral Disorders*, 19, 217-232.

Wallace, F., Blase, K., Fixsen, D., & Naoom, S. (2008). Implementing the findings of research: Bridging the gap between knowledge and practice. Washington, DC: Educational Research Service.