Comprehensive Review of Special Education

Knox County Schools

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PURPOSE OF THE STUDY

In August 2024, Knox County Schools (KCS) engaged with Public Consulting Group (PCG) to independently review its special education program and services. This Executive Summary describes the current state of the special education program in Knox County Schools and is designed to guide the District toward continuous improvement.

This study examined the following guiding research questions:

Learning Environment and Specialized Services

- To what extent is the Multi-Tiered System of Supports (MTSS) employed to support students requiring academic and/or behavioral intervention?
- To what degree do students with disabilities have access to the general education curriculum and inclusive practices employed? How is the continuum of services organized to support a Free and Appropriate Public Education (FAPE)?
- Are special education services consistently delivered and documented according to timelines? Are federal and state regulations for special education followed throughout the special education process?

High Expectations

- To what extent does KCS implement a rigorous process to monitor educational benefits systematically? How do IEP teams determine services and placement?

Human Capital and Leadership

- How does KCS organize and utilize its human capital resources?
- How does KCS organize its leadership to support special education and foster a culture focused on improving outcomes and post-secondary preparation?

Systems and Structures

- How does KCS allocate resources in a way that facilitates maximum return on district investment? How does school-based staffing align with best practices in supporting students with disabilities?

Family and Community Engagement

- To what extent are parents of children with IEPs satisfied with their child's educational program?

METHODOLOGY

PCG conducted a mixed-methods study of the special education program in KCS. The findings and recommendations related to programs, policies, and practices resulted from a comprehensive review of several data sources. Sources included 1) Data and Document Analysis, 2) Organizational Focus Groups/Interviews, 3) Staff and Parent Surveys, and 4) Classroom Observations. These components were drawn from research and practice literature to inform the findings and recommendations. PCG used publicly available achievement and financial information to compare key KCS statistics against local, district, state, and national data. The method and sources of data were triangulated to increase the validity of the conclusions regarding program implementation, identification of gaps in services and programming, and recommendations for the continued improvement of KCS special education programs and continuum of services.

Details of each data source are included below.

Data and Document Analysis

Population Trends, Programs, and Achievement Outcomes Analysis

PCG analyzed special education population trends, programs, and achievement outcomes. The team analyzed assessment data, educational setting data, and other indicators by comparing student identification rates and outcomes by disability, race, gender, and other demographic variables. Data included in the report also compared students with IEPs to their general education peers.

Document Review

PCG analyzed around 100 documents for information related to District and school structures, programs, policies, and practices. The documents were coded for themes aligned with the focus group and interview findings. Documents reviewed were from the following categories:

- Organizational structure, staffing, and resource allocation
- Description of academic programs, services, interventions, and activities
- Documents regarding instruction and professional learning
- District procedures and guides
- Compliance and due process complaints
- Fiscal information, including budget documents

Organizational Focus Groups and Interviews

To understand how special education programs operate within the District, organizational focus groups and interviews were designed to include a range of stakeholders. These focus groups included various central office staff, school-based staff, and family participants. PCG provided the KCS leadership team with a sample schedule and a list of recommended positions for these groups, helping incorporate diverse stakeholders. PCG collaborated with KCS to identify the most effective outreach and communication methods for focus groups and interview participation, supporting a voluntary and unbiased selection process.

Focus groups consisted of between 2 and 14 participants, while interviews were held one-on-one with participants. Overall, a cross-section of staff participated in focus groups to provide a strong sampling of KCS staff from both the District and building levels. As part of this review, supervisors did not participate in the same focus groups or interview sessions with those staff members they supervised to allow all staff to speak candidly and honestly.

Five parent groups were held. PCG added sessions in response to high sign-up rates, allowing more parents to participate. PCG held 36 focus groups with various stakeholders.

Staff and Parent Surveys

An online survey was implemented to collect data on stakeholder perceptions of the quality and effectiveness of KCS's special education services. PCG collaborated with KCS to review survey items and disseminate two surveys to staff and parents of students with IEPs.

Survey Items

Survey items were drawn from the research and practice literature in special education and clustered to acquire data from each stakeholder group regarding the extent to which these groups perceived that policies and practices shown in the literature support effective programming, parent involvement, and positive results for students with disabilities in KCS.

KCS leadership reviewed the survey items to verify their relevance and to add items where appropriate. KCS provided a list of schools in the District and context on state-specific and District-specific language, which informed any revisions to survey questions. The survey incorporated five-point rating scales, yes/no questions, and included open-ended text areas. For reporting purposes, the five-point rating scale was consolidated into three categories: agree (which provides for strongly agree and agree), disagree

(which includes strongly disagree and disagree), and don't know or not applicable (where this option was provided to respondents).

Survey Process and Analysis

PCG worked collaboratively with KCS to facilitate a survey process that would result in the highest possible rate of return. The window to complete the Staff Survey was 3.5 weeks, and the window for the Parent Survey was 4.5 weeks. To encourage participation, all parents of students with an IEP were informed of the survey's purpose and provided instructions for accessing it via email. KCS solicited parent participation in the study through Parent Square with two follow-up reminders and targeted outreach with the ELL Family Liaison.

A total of 1,177 parents, representing approximately 8% of those who received the online survey, completed or partially completed it. Similarly, 1,976 staff members, or approximately 16% of those surveyed, responded to the online staff survey. While these responses provide valuable insights, the results should be interpreted cautiously, as the parent response rate is slightly below the threshold typically required for a representative sample.

In survey research, a response rate of at least 10-20% is generally considered more reliable for drawing broad conclusions that reflect the perspectives of the entire population. Given the relatively low percentage of respondents for the parent survey, there is a higher potential for response bias, meaning that the perspectives shared may not fully represent the views of all parents and staff. Those who chose to participate may have stronger opinions or different experiences than those who did not respond. Therefore, while the data highlights essential themes and concerns, it should be considered alongside other sources of information, such as focus groups, interviews, and existing District data, to gain a more comprehensive understanding of stakeholder perspectives.

Survey responses from staff included the following groups:

- General education teachers
- Special education teachers
- School building administrators
- Special education educational assistants
- Student support services (Psychologist, Nurse, Counselor, BCBA, Behavior Interventionist, etc.)
- Related service providers (OT, PT, Speech, Vision, Hearing, Orientation, and Mobility)
- Specials/Electives teachers
- Other school-based staff

Responses to this survey included staff from all the above-mentioned groups and provided a representation of roles across KCS. Selected survey findings will appear within the report's main body to support conclusions from specific topics and themes.

School Visits

In October 2024, PCG visited 27 schools in KCS over three days, observing approximately 71 classrooms. During these visits, classes were followed for 20 to 45 minutes, depending on the subject area and programming. To select classrooms for visits, PCG requested a list of students with IEPs and their level, subject area, and placement designation. The intent was to represent all placement settings across district schools.

PCG's School Observation protocol was designed to collect qualitative information about the school building and individual classrooms; it is not meant to evaluate teachers. It focused on several key areas: 1) Classroom Staffing, 2) Classroom Environment, 3) Specially Designed Instruction, and 4) Data Collection Methods. PCG observed all instructional and service delivery settings (e.g., inclusion classrooms, co-taught classes, CDC classes, blended preschool classes, and specialized programs)

across grades. The overall school environment was also observed, including non-instructional spaces such as the lunchroom, office, and hallways.

The resulting data from all school visits are categorized and aggregated to inform impressions of the special education system district-wide and indicate areas where professional learning in special education practices may be considered. Using aggregated data across the classroom level and type adheres to the agreement not to identify specific schools or staff. Furthermore, this information is mainly used as another data set for overall triangulation.

PCG Foundational Approach

PCG approaches its work with state, county, and district organizations as a thought partner. We act as an outside agent with an objective perspective, working alongside educational entities to identify challenges and provide recommendations for improvement.

We follow a systemic, mixed-method collaborative program evaluation model based on qualitative and quantitative research methods. This model produces credible and valid data that proactively informs program implementation, identifies gaps, and offers recommendations for the continued improvement of the system. We value building trust, fostering open communication, and encouraging collaboration between the review team and program staff.

Our philosophy for improving student outcomes in schools and districts is based on the U.S. Department of Education's Results-Driven Accountability (RDA) structure and our Special Education Effectiveness Domains framework.

In the law, Congress states:

> "*Disability is a natural part of the human experience and in no way diminishes the right of individuals to participate in or contribute to society. Improving educational results for children with disabilities is an essential element of our national policy of ensuring equality of opportunity, full participation, independent living, and economic self-sufficiency for individuals with disabilities*."

One purpose of the Individuals with Disabilities Education Act of 2004 (IDEA) is to assess and ensure the effectiveness of efforts to educate children with disabilities. This is achieved through accountability measures established by the federal Office of Special Education Programs (OSEP), state special education agencies, and sometimes, special education case law.

While compliance indicators remain essential, under the RDA framework, OSEP has sharpened its focus on what happens in the classroom to promote educational benefits and improve outcomes for students with disabilities.

This change is based on data showing that, despite significant federal efforts to close the achievement gap, the educational outcomes for America's children and youth with disabilities have not improved as expected. The previous accountability system emphasized procedural compliance but often overlooked how these requirements affected students' learning outcomes.

This shift dramatically impacts the guiding priorities of special education systems nationwide, including in KCS. Districts across the country strive to elevate the rigor level in the classroom and cultivate a culture of academic optimism.

The U.S. Supreme Court's decision in Endrew F. v. Douglas County School District on March 22, 2017, underscored the importance of these issues. In this landmark case, the Court revised its prior standard for assessing whether a school district provides an appropriate education for students with disabilities. The ruling emphasized the need to establish ambitious and challenging goals that enable each student to achieve academic and functional progress and advance from grade to grade. For students with disabilities, including those adhering to alternate academic achievement standards, progress must be appropriate in light of their unique circumstances. The Court also clarified that yearly progress must

exceed the "merely more than de minimis" standard some lower courts had previously applied. The ruling underscored that the IDEA requires more than minimal progress. The Endrew decision struck a balance between the lower standard used by the 10th Circuit and other courts ("more than de minimis") and the higher standard advocated by Endrew's parents, who sought to provide students with disabilities opportunities for academic success, self-sufficiency, and meaningful societal contributions similar to those available to children without disabilities. The most significant impact of the Endrew decision in the classroom is observed in: (1) the design and development of rigorous Individualized Education Programs (IEPs); (2) the faithful implementation of these IEPs; and (3) increased monitoring of progress toward goals.

SPECIAL EDUCATION EFFECTIVENESS DOMAINS
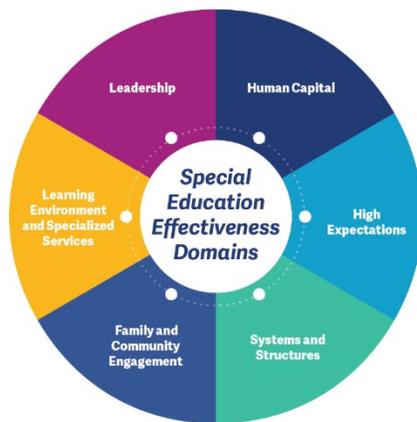
Building on extensive research and our collective experience and expertise serving school districts and state education departments nationwide, PCG has developed this Special Education Effectiveness Framework to assist school districts in catalyzing conversations about, and reviewing and improving the quality of, their special education programs.[6] It is designed to provide school district leaders with practices to strengthen special education services and supports, highlight systemic improvement's multidisciplinary nature, and establish a pathway for districts to achieve compliance and results. An intentional focus on improving outcomes for students with disabilities leads to improved outcomes for ALL students.

When implemented with a systems-thinking approach, the six domains of our Special Education Effectiveness Framework help superintendents and district leaders improve educational and functional outcomes for students with disabilities.

The findings and recommendations in this report are organized around these domains and are oriented toward extending KCS's focus on outcomes for students with disabilities.

TERMINOLOGY

Several terms are used throughout this report that require definition and clarification within the KCS context.

Blended Preschool. KCS's preschool program is a fully inclusive/blended setting. In blended preschool classrooms, at least half of the students are non-disabled peers. Students with disabilities and peer models learn together in a classroom staffed with one dually certified general education/special education teacher and at least two education assistants.[1]

CDC (Comprehensive Development Classroom). A CDC classroom is a self-contained setting and one stop on the continuum of services the District offers. Not all KCS schools have a CDC classroom, but CDC classrooms are available at the elementary, middle, and high school levels.[2]

Functional Delay. Functional delay is a Tennessee-specific educational disability category, meaning a continuing significant disability in intellectual functioning and achievement that adversely affects the student's ability to progress in the general school program. However, adaptive behavior in the home or

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[1] Knox County Schools. (2024) *Special Education Department One Page Document Directory.*
[2] Knox County Schools. (2024) *Special Education Department One Page Document Directory.*

community is not significantly impaired and is at or near a level appropriate to the student's chronological age.[3]

Intellectually Gifted. In Tennessee, some students identified as Intellectually Gifted are served with IEPs, and their services fall under special education.[4] This classification indicates a child whose intellectual abilities, creativity, and potential for achievement are so outstanding that the child's needs exceed differentiated general education programming, adversely affect educational performance, and require specifically designed instruction or support services.[5]

Multi-Tiered Systems of Support (MTSS). MTSS is a framework for delivering evidence-based academic, behavioral, and social-emotional interventions tailored to the needs of all students. MTSS uses a proactive, data-driven approach to identify and support students through a continuum of services organized into three tiers:

- *Tier 1 (Universal Supports):* High-quality instruction and interventions provided to all students in the general education setting.
- *Tier 2 (Targeted Supports):* Small-group interventions for students who need additional support beyond what is universally provided.
- *Tier 3 (Intensive Supports):* Individualized interventions for students with significant or persistent needs.

Project SEARCH is a non-paid, hands-on transition-to-work program for individuals with disabilities. Its goal is to prepare each intern for competitive, integrated employment upon completing this year-long internship.[6]

RTI². RTI² monitors a student's need for support and guides change in academic support.[7]

S-Team (School Support Team). The purpose of the S-team is to provide a platform for brainstorming solutions and interventions, and to identify potentially educationally relevant problems.[8] If the team does not observe the students' progress with general education interventions, it may determine whether a referral for an evaluation for special education is needed.

Students Receiving Special Education Services. References are made to students receiving special education services. They will also be referred to as students with Individualized Education Programs (IEPs) or students with disabilities (SWDs). The terms are intended to be interchangeable. This categorization does not include students with disabilities who exclusively have 504 Plans.

SWD. Acronym for Students with Disabilities, which is used throughout the report.

SWoD. Acronym for Students without Disabilities, which is used throughout the report.

TDOE. Acronym for Tennessee Department of Education.

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[3] TN Department of Education. (2018). Functional Delay Evaluation Guide.
https://www.tn.gov/content/dam/tn/education/special-education/eligibility/se_functional_delay_evaluation_guidance.pdf
[4] TN Department of Education. (n.d.). *Intellectually gifted*. TN Department of Education.
https://www.tn.gov/education/families/student-support/special-education/intellectually-gifted.html
[5] Ibid.
[6] Ibid.
[7] **"**The KCS Way Intervention" guidance document, July 2024.
[8] Definition from KCS Special Education Department One Page Document Directory, February 2024

TN Pulse. A web-based platform for recording and storing student learning plans (IEPs and 504s), Individual Learning Plans, and ILP-D plans. Used by school districts, public charter schools, and state-operated programs.[9]

BACKGROUND ON KNOX COUNTY SCHOOLS

Knox County is at the geographical center of the Great Valley of East Tennessee. Knoxville, the largest city in Knox County, is also the largest city in East Tennessee, near the Cumberland and Great Smoky Mountains.[10] Knoxville is just 60 miles from the Great Smoky Mountains National Park, drawing tourists for outdoor activities, but also for opportunities to engage with vibrant local arts and food scenes. The University of Tennessee, Knoxville, enrolled about 38,000 students in Fall 2024 and is a leading research university in areas including agriculture, manufacturing, and STEM.[11]

Superintendent Dr. Jon Rysewyk took office at KCS in 2022. He identified four district priorities: 1) excellence in foundational skills, 2) providing great educators in every school, 3) career empowerment and preparation, and 4) success for every student.[12] Furthermore, based on the guidance of the Knox County Board of Education, KCS is developing a five-year strategic plan from 2025 to 2030, overseen by a five-member Strategic Plan Committee.[13] To inform the strategic plan, the District solicited community feedback through surveys that opened in the Fall of 2024.[14]

In recent years, KCS has established five regional teams to enhance efficiency and effectiveness in addressing the four district priorities. Each region is led by one Director and Supervisor, with schools assigned to areas according to feeder patterns and geographic proximity. Preschools are not included in the five regions but are managed separately by KCS's Director of Early Childhood, a Special Education Supervisor, and a Regional Director.

KCS serves over 60,000 students, comprises 93 schools, and has over 9,000 staff members.[15] KCS supports a community of more than 470,000 residents as of the 2020 census.[16] According to the TN Department of Education School Report Card for KCS, 66% of students in the District are White, making up the majority of students. The next most populous racial/ethnic subgroup is Black or African American, at 17%. Asians make up 3% of students, and Native Hawaiian or Other Pacific Islander, as well as American Indian or Alaskan Native, make up <1% of the student population. 21% of students are economically disadvantaged, and 8% are English Learners. 16% of students in KCS are identified as students with disabilities.[17] It is essential to recognize the diversity of the District's student population and the experiences of all students with disabilities, including those who are a part of other marginalized subgroups.

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[9] *TN Pulse*. TN Department of Education. (n.d.-c). https://www.tn.gov/education/families/student-support/special-education/tn-pulse.html

[10] *About KCS / About Knox County Schools*. Knox County Schools. (n.d.). https://www.knoxschools.org/domain/961

[11] University of Tennessee, Knoxville. (n.d.). *Fact book*. Institutional Research and Strategic Analysis. https://irsa.utk.edu/reporting/fact-book/

[12] *Superintendent Dr. Jon Rysewyk* (n.d.) https://www.knoxschools.org/domain/100

[13] Strategic Plan / Strategic Plan 2019-2024

[14] Ibid.

[15] Knox County Schools / Homepage. (n.d.). https://www.knoxschools.org/

[16] *U.S. Census Bureau quickfacts: Knox County, Tennessee*. United States Census Bureau. (n.d.). https://www.census.gov/quickfacts/fact/table/knoxcountytennessee/PST045222

[17] *Knox County: About This District*. TN Department of Education. (n.d.-a). https://tdepublicschools.ondemand.sas.com/district/00470/about/about

The KCS Department of Special Education (DSE), housed within the Student Success Division, ensures that students with IEPs have a free and appropriate public education. This responsibility requires consistent implementation of federal and local mandates. DSE is tasked with essential yet sometimes competing responsibilities: respecting the site-based leadership within each school while promoting practices to improve the outcomes of students with disabilities and ensuring consistent adherence to the law.

KCS' DSE prioritizes "Empowering Students and Individualizing Learning" as noted in its logo. The District has further demonstrated its commitment to partnership with the following information highlighted on the Department's website landing page:[18]

> *"Knox County Schools works together with families to provide special education services to students, ages 3 to 22, to ensure their academic, social, emotional, medical, behavioral, adaptive, and physical needs are met in accordance with State and Federal laws.*
>
> *Prioritizing Success for Every Student - Special Education isn't just an office at KCS – it is a set of specifically designed services coordinated and provided by experts and professionals to ensure approximately 9,000 special education students reach their maximum potential."*

Knox County Special Education Task Force

In Spring 2023, Superintendent Dr. Jon Rysewyk partnered with nine parents of students with disabilities representing different regions throughout Knox County and one former Teacher of the Year to create the KCS Special Education Task Force. The Task Force was enacted to provide KCS and the Board of Education with timely and relevant recommendations to improve special education services for students with disabilities and their families. A series of data points were gathered and analyzed by the Task Force including, "survey data, focus group data, personal experiences shared by Task Force members, independent research, KCS Educator Input Portal, Hamilton County Schools Three-Year Plan for Special Education, and a review of legal actions against KCS and other districts regarding Individuals with Disabilities Education Act (IDEA) and Americans with Disabilities Act (ADA)."[19]

Five recommendations from the Special Education Task Force were presented to the KCS Board of Education and Superintendent, via a memorandum, in August 2023:[20]

1. Establish a new code of conduct for special education employees that clearly defines expectations for administrators, supervisors, mentors, facilitators, education assistants, teachers, and staff. The code of conduct should exhibit a "student first" mentality and emphasize internal and external communication, expectations for employees, empowering those closest to the student to make decisions, and identifying corrective or disciplinary actions.
2. Bring in an expert in inclusion and structural reforms to reimagine KCS special education and make "success for every student" accessible to those with special needs. This includes providing teachers and administrators with the support and resources they need to be successful.
3. Someone other than the Knox County Law Department reviews and evaluates cases against KCS.
4. Always ask, "What is the 'win' in fighting parents in litigation?"

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[18] Knox County Schools. (n.d.). *Special education*. Knox County Schools. Retrieved March 2, 2025, from https://www.knoxschools.org/specialeducation

[19] Knox County Schools. (2023, August). *8114 Final SPED Task Force Memo*. Compass Knox. Retrieved March 2, 2025, from https://compassknox.com/wp-content/uploads/2023/08/8114_Final_SPED_Task_Force_Memo_August_2023.pdf

[20] Knox County Schools. (2023, August). *8114 Final SPED Task Force Memo*. Compass Knox. Retrieved March 2, 2025, from https://compassknox.com/wp-content/uploads/2023/08/8114_Final_SPED_Task_Force_Memo_August_2023.pdf

5. Establish non-time-bound counsel to review the KCS special education department, including progress towards the recommendations in this memo.

PCG has reviewed the findings and recommendations of the KCS Special Education Task Force as part of this study. This decision was intentional. PCG team members must have a contextual understanding of the District's special education culture. This memorandum was one of many data points analyzed for this comprehensive District special education programming review.

KEY TAKEAWAYS

A high-quality special education program is only as strong as the general education foundation upon which it is built. Our review begins with this fundamental understanding: the effectiveness of special education is not the sole responsibility of the special education department or its staff. Instead, it is a shared commitment that requires alignment, collaboration, and ownership across the entire District—including general education teachers, school and District leaders, Board members, families, and the broader community.

This report is not a one-time evaluation but a step in an ongoing continuous improvement process. The recommendations outlined here are designed to enhance KCS's ability to meet the needs of all learners by strengthening inclusive practices, reinforcing shared responsibility, and providing every student with access to a rigorous and supportive educational experience. Implementing these shifts will require a district-wide commitment, and this report guides that collaborative effort. We aim to support the District in building capacity at every level so that special education services are integrated seamlessly into a high-quality educational experience for all students. While PCG will assist in action planning, lasting change will require sustained commitment and leadership from the District to drive these efforts toward meaningful improvements for all learners.

The following key takeaways are high-level priorities for KCS to consider as it begins action planning and developing a roadmap to drive meaningful improvement. These priorities reflect critical areas of focus that address current challenges and leverage opportunities to strengthen systems, structures, and practices. They provide a foundation for building a unified vision of support for all students, strengthening inclusive practices, and aligning resources to promote the effective and sustainable implementation of the District's initiatives. By focusing on these priorities, KCS can set the stage for actionable steps that encourage collaboration, shared ownership of student outcomes, and continuous improvement across all levels of the organization.

1) *Competing Perspectives and Student-Centered Decision-Making*

A review of recent legal cases highlights ongoing tensions surrounding special education placements, disciplinary actions, and access to appropriate services. While families have the right to seek legal recourse when they believe their child's needs are unmet, due process hearings and lawsuits are time-consuming, costly, and can strain relationships between parents and District leadership. Staff reported feeling significant external pressure in IEP decision-making due to the fear of litigation, often leading to decisions that prioritize avoiding disputes rather than adhering to data-driven student needs. This dynamic can contribute to inconsistencies in service determinations, the overuse of accommodations and service provision, and reluctance to declassify students who may no longer require special education services, ultimately diluting the system's integrity.

The due process cases from the 2023-24 and 2024-25 school years reflect a range of disputes related to placement, disciplinary practices, service provision, and procedural compliance. The District has successfully resolved cases through mediation, with only a few proceeding to judicial rulings. However, two due process hearings related to student discipline resulted in rulings against the District, highlighting a need for additional training on manifestation determination meetings, disciplinary policies for students with disabilities, and legally sound decision-making processes. Additionally, the administrative complaints filed suggest that while the District is frequently found in compliance, unresolved parent concerns can

persist. The declining number of administrative complaints from one year to the next indicates some improvement in District practices. Yet, refiled cases suggest that issues remain unresolved to parents' satisfaction.

External messaging further amplifies the perception of frequent legal disputes, including a Special Education Task Force memorandum to the KCS Board of Education and Superintendent, which cited an opinion piece stating that the District "continues to lose multiple lawsuits a year over issues involving the Americans with Disabilities Act and Individuals with Disabilities Education Act."[21] While such claims do not fully align with the District's legal record, where many cases have been resolved through mediation or dismissed outright, the involvement of legal advocates, including the Public Defender's Office, underscores a need for continued reflection on transparency, clear documentation, and structured decision-making processes.

Moving forward, KCS has an opportunity to strengthen proactive family engagement strategies to reduce reliance on legal mechanisms for dispute resolution. Currently, the District has a Special Education Ombudsman and a Pre-School Special Education Parent Liaison to support parents with special education. The Special Education Ombudsman is a primary point of contact for concerns regarding students who receive special education services. This role is designed to serve as a navigator for families to resolve issues or concerns through mediation and education, as identified on the KCS district website. The Pre-School Special Education Parent Liaison is a newly created position within KCS to support families in navigating preschool special education services and transitioning to Kindergarten. These new positions highlight KCS's proactive strategy to improve family engagement through proactive dispute resolution and meaningful partnerships.

Enhancing training for school teams on procedural safeguards, transitions across the grade bands, and placement decision-making could help address recurring concerns before they escalate into formal legal action. Additionally, fostering a culture of collaboration—where staff feel empowered to make instructional decisions based on student data rather than fear of litigation—could improve trust and lead to more meaningful, student-centered outcomes.

2) Compliance and Staffing Perceptions in Special Education

Various study participants expressed the perception that KCS does not adequately meet the needs of students with disabilities by adhering to special education compliance standards. This aligns with a key finding noted in the August 2023 Special Education Task Force memo to the KCS Board of Education and Superintendent, stating: "the special needs community has a deeply ingrained perception that KCS struggles to make full compliance with federal laws that promote accessibility and inclusivity a top priority."[22] That perception still exists with some study participants acknowledging that "wins" associated with the provision of special education in KCS are not as widely shared in public forums, likely compounding this belief.

KCS demonstrated compliance with several federal accountability indicators measured by the Local Education Agency (LEA) Annual Performance Report (APR) Indicator Summary for the 2022-23 school year. Most notably, the District exceeded the 95 percent participation rate, representing the percentage of students with disabilities in KCS taking statewide assessments (Indicator 3A) and the post-school outcome targets for students with disabilities (Indicator 14).[23] KCS demonstrated an 88.65 percent compliance with Indicator 11, defined as "Child Find: Percent of children evaluated within 60 days from

[21] U.S. Congress. (2004). *Individuals with Disabilities Education Act, 20 U.S.C. § 1400 et seq.* https://www.congress.gov/bill/108th-congress/house-bill/1350

[22] Knox County Schools. (2023, August). *8114 Final SPED Task Force Memo*. Compass Knox. Retrieved March 2, 2025, from https://compassknox.com/wp-content/uploads/2023/08/8114_Final_SPED_Task_Force_Memo_August_2023.pdf

[23] Tennessee Department of Education. (2023). *LEA APR indicator summary 2022-23*. Tennessee Department of Education. https://www.tn.gov/content/dam/tn/education/special-education/lea_apr_indicator_summary_2022-23.pdf

parent consent for initial evaluation or within a state-established timeframe."[24] Compliance for Indicator 11 is set at 100 percent.

Special education staffing vacancies and retention rates were highlighted as potential mitigating factors impacting KCS's ability to meet the needs of students with disabilities via adequate compliance. KCS has experienced chronic, difficult-to-fill vacancies for the role of school psychologists. It is PCG's analysis that this likely impacts the District's ability to meet Indicator 11 timelines, given the essential role school psychologists play in conducting evaluations as part of the multidisciplinary team determining eligibility for special education services under IDEA. The District recently saw marked decreases in special educator and educational assistant vacancies. Attrition data for KCS special education staff were not analyzed in this review. However, the compounded effects of critical vacancies, such as school psychologists, cannot be overlooked when establishing a strong foundation for compliance and making strides towards high-quality outcomes for students with disabilities in KCS. It is a district-wide call to action to prioritize innovative recruitment efforts for difficult-to-fill vacancies and to retain high-quality special education staff.

KCS has taken steps to recruit and retain special education teachers through an ongoing $7,000 stipend distributed over three years. Stakeholder perception data indicate that this program is well-regarded and viewed as a strength of the District. However, focus group themes and survey responses also reflect concerns among stakeholders that a shortage of special education staff in KCS affects the quality of IEP development and creates challenges for related service providers in meeting required service minutes. While related service providers serve many students across KCS, our analysis shows caseload sizes do not exceed limits recommended by national professional associations. However, this does not account for individual workload for these providers. Caseload analyses for special education teachers indicate that while, on average, there is consistency in special education teacher and educational assistant allocations across schools, there are variations in caseload sizes between schools, with some special education teachers assigned caseloads of 40 or more students. In contrast, special education teachers at other schools in the District have much lower caseloads. This is similar to comparing educational assistant assignments across campuses.

The District should review caseload sizes for related service providers in relation to staff workload expectations and student needs to determine whether current caseloads are sustainable, equitable, and support the timely delivery of IEP services. Similarly, the District should examine workload responsibilities for special education teachers and allocate special education assistants at campuses with high staff-to-student ratios to assess whether current staffing patterns are sufficient to provide services as outlined in students' IEPs.

Perceptions of special education non-compliance have become deeply rooted in parts of the KCS community. While these perceptions do not negate the District's data showing measurable non-compliance with some key accountability indicators—or the lived experiences of students with disabilities and their families—they present an opportunity to address the underlying cultural and systemic challenges contributing to divisions within the special education community. To move forward, PCG recommends that the District establish clear staffing structures and communication protocols between district- and school-level leadership to strengthen collaboration and build trust. It is also critical to clarify roles and decision-making authority related to the provision of special education and related services to support consistent implementation and reduce gaps in staff knowledge. Increasing transparency and inclusiveness in staffing decisions can help ensure that those decisions are aligned with best practices and responsive to the unique needs of schools. Finally, the District should implement structured processes to incorporate parent perspectives and educator expertise into decision-making. Doing so will

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[24] Tennessee Department of Education. (2023). *LEA APR indicator summary 2022-23*. Tennessee Department of Education. https://www.tn.gov/content/dam/tn/education/special-education/lea_apr_indicator_summary_2022-23.pdf

foster collaboration, build shared responsibility, and support the development of effective, sustainable practices.

3) Expanding K-12 Inclusive Opportunities within the Continuum of Services

Inclusive practices are considerably more robust in the KCS preschool setting for students with disabilities. All specially designed instruction for preschoolers with disabilities is provided in an inclusive setting via the blended classroom model or in a co-taught classroom. Study participants, staff, and parents acknowledged the incredible benefits of inclusive preschool programming in KCS.

Non-disabled peers admitted to the blended preschool program serve as peer models for preschoolers with disabilities. Staff participants in the study shared a critical perspective regarding the admission of non-disabled peers into preschool programs designed to support inclusive learning environments. Several noted that many peer models—non-disabled preschool students—often enter school without the developmental, social, behavioral, or pre-academic skills typically expected of age-appropriate models. As a result, staff reported providing similar levels of support to both non-disabled peers and students with disabilities, which can limit the effectiveness of the peer modeling approach as initially intended. It was suggested that a more rigorous application process for non-disabled peer models be implemented to support the success of inclusive preschool opportunities in KCS. Several years ago, a similar request was suggested, such as a more rigorous, formal screening process for preschool peer models. District leaders and Board members assessed the appropriateness and viability of this approach. It was determined that such a process was not feasible due to potential admission biases.

The transition from inclusive preschool classrooms to general education kindergarten classes for students with disabilities in KCS was identified as a persistent challenge. Key barriers include significant shifts in staffing structures and increased academic and behavioral expectations. General education kindergarten classrooms typically serve more students with fewer adults, requiring greater student independence in navigating routines, demonstrating appropriate behavior, and meeting instructional demands. Study participants reported that preschool and kindergarten educators are not consistently collaborating to align or adjust expectations, which would help ease the transition for students with disabilities. As a result, some students struggle to meet the demands of the kindergarten setting, impacting their early elementary experience.

KCS has pursued the expansion of co-taught instruction across K–12 settings as part of its broader commitment to inclusive practices. However, the structure and interpretation of co-teaching vary across the District. While District leaders define co-teaching as classrooms staffed by both a general educator and a special educator collaboratively delivering content instruction, this model is not uniformly understood or implemented. In practice, especially in elementary schools, the term "co-taught" is sometimes used to describe classrooms where special education assistants support special educators by implementing accommodations, modifications, or providing behavioral support. The official co-teaching model—as defined by two certified educators working in tandem—is more commonly established in middle and high schools.

Despite the District's efforts, several barriers have hindered full-scale implementation of the co-teaching model. Persistent staffing shortages, including vacancies in both special educator and assistant roles, have forced schools to triage resources, often leading to more students with disabilities being placed in general education classrooms without sufficient instructional support. Current classroom staff may lack the capacity or training to modify instruction or materials appropriately, placing additional strain on already limited resources. Focus group and survey data indicate that these staffing challenges may also contribute to retention issues in key special education positions, thereby perpetuating a cycle that makes sustained implementation of inclusive models more difficult. The lack of consistent structures and a

shared understanding of co-teaching expectations across the District has led to confusion among staff and variability in student experiences.

At the same time, KCS has established a foundation for inclusive practices in several schools, as evidenced by positive staff feedback in both surveys and focus groups. To build on this momentum, District leadership should focus on creating a cohesive and articulated continuum of inclusive services that all staff understand and are equipped to implement. This includes clarifying the definition and purpose of co-teaching, aligning staffing models to support it, and providing professional learning to strengthen implementation. Ultimately, every student with a disability should have equitable access to inclusive learning environments and core instruction that support academic growth, regardless of their school or specific special education placement.

While these are areas of opportunity for special education, KCS has demonstrated a commitment to high expectations and inclusive practices for students with disabilities, as evidenced by strong specialized programs and a focus on structured literacy instruction. Programs such as Project SEARCH at the secondary level and structured behavioral interventions at the elementary level highlight the District's ability to implement best practices that support academic and social-emotional development. However, variability in instructional practices, inconsistent approaches to curriculum modifications, and limited collaboration between general and special education teachers present areas for growth. Survey and focus group data suggest that while educators believe in maintaining high expectations, challenges in training, co-teaching structures, and instructional practices impact effective implementation.

4) Disproportionality in Special Education and Student Achievement

An analysis of the demographic composition of students with IEPs in KCS reveals disparities in how students from different racial and ethnic backgrounds are identified across specific disability categories. These patterns raise concerns about the processes guiding identification and whether biases in referral, evaluation, or eligibility decisions exist and may influence outcomes.

Black or African American students are disproportionately identified as eligible for special education as students with Functional Delay, Developmental Delay, and Specific Learning Disabilities. In contrast, Asian and White students are overrepresented in the Intellectually Gifted category. Specifically, Asian students are 25.26 times more likely to be identified as Intellectually Gifted, a number that far exceeds any threshold set by federal or state disproportionality measures. These disparities warrant closer examination, especially given that Functional Delay and Intellectually Gifted are not federally mandated disability categories in Tennessee and are therefore not monitored by the TDOE in a method comparable to federally mandated disability categories established by the IDEA. While the District provides training on and adheres to state requirements—reviewing them annually—the state does not monitor disproportionality in these categories with the same rigor as federally mandated ones. As a result, without clear state or federal oversight, identification practices may vary significantly across schools, increasing the risk that students are placed in these categories based on subjective criteria rather than consistent, data-driven assessments. Based on the findings in this report for these two non-federally mandated categories (e.g., Functional Delay and Intellectually Gifted), the District is currently developing a process to closely monitor these two categories at the District level.

This data raises important questions about which students are being identified under specific disability categories and why these trends exist. It also highlights the need to examine how referral and evaluation practices contribute to these patterns and whether systemic factors, such as educator perceptions, assessment tools, or access to interventions, influence identification decisions.

To address these concerns, the District should conduct a deeper analysis of identification trends to understand the root causes of these disparities. This should also include a deeper analysis of current tiered interventions for students before they are referred to special education. Reviewing referral and evaluation procedures can help promote consistency and equity in identification practices. Additionally,

providing professional development on applying objective special education identification criteria may help mitigate potential influences on decision-making. Exploring alternative support models could also reduce reliance on specific disability categories as the primary means for students to access services. By taking these steps, the District can work toward a system that accurately identifies and supports all students based on their needs rather than demographic trends.

Additionally, proficiency rates from the Tennessee Comprehensive Assessment Program (TCAP), including End of Course (EOC) assessments, highlight both progress and persistent challenges in the academic performance of students with disabilities. While students with disabilities in grades 3-8 and high school generally perform slightly better than their peers with disabilities statewide, significant achievement gaps remain between students with disabilities and their non-disabled peers within KCS.

In English Language Arts (ELA), students with disabilities in grades 3-8 consistently outperformed their peers with disabilities across the state by 3 to 5 percentage points. However, the gap between students with disabilities and all students in KCS remained substantial, ranging from 21 to 28 percentage points. At the high school level, students with disabilities in KCS also performed slightly better than their peers statewide on ELA exams. Still, the gap between students with disabilities and all students was even more significant, ranging from 33 to 39 percentage points over the years studied. While overall proficiency for all students in the District has gradually increased in recent years, proficiency for students with disabilities has declined slightly, raising concerns about their academic trajectory.

In math, students with disabilities in grades 3-8 also performed slightly better than their peers with disabilities across the state, but their proficiency rates remained consistently low. The gap between students with disabilities and all students in KCS has fluctuated, narrowing to 20.1 percentage points in 2020-21 before widening again to 26.2 percentage points in 2023-24. At the high school level, math proficiency rates for students with disabilities have remained extremely low, ranging from less than one percent in 2020-21 to 4.6% in 2023-24. The gap between students with disabilities and all students in KCS, which had decreased to 6.6 percentage points in 2020-21, has since expanded to 22.9 percentage points in 2023-24.

These trends raise concerns about the achievement of students with disabilities on statewide assessments. Although proficiency rates are only one measure of student success, the persistent and, in some cases, widening gaps indicate that students with disabilities are not making comparable academic progress. Given the number of students identified with high-incidence disabilities, the gap should not be as pronounced as it currently is, particularly in high school math, where proficiency rates remain extremely low. The fact that some grades and subject areas show proficiency rates of just 1-2% is particularly concerning and warrants more profound analysis.

The District should examine the instructional supports, interventions, and access to rigorous coursework available to students with disabilities across general and special education. Supporting strong academic outcomes for students with disabilities is not solely the responsibility of special education. Still, it requires a strong foundation in general education, as special education services build upon the instruction and support provided in general education settings. A closer look at how special education services are delivered, the integration of evidence-based practices, and targeted professional development for all educators, general and special education alike, on how to implement high-quality/high-impact instruction aligned to standards, will be essential in addressing these gaps and improving outcomes for students with disabilities.

II. STATE PERFORMANCE PLAN AND KCS'S RESULTS-DRIVEN ACCOUNTABILITY

The essential question we address in this chapter is:
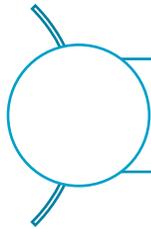
How does KCS perform on student outcomes for students with disabilities?

Below are the strengths and opportunities for improvement regarding SPP Indicators and Results Driven Accountability.

Strengths	Opportunities for Improvement
• **SWDs' Performance on Statewide Assessments in Grades 3-8 Compared to SWDs Across the State.** Students with disabilities in KCS outperformed students with disabilities statewide on grades 3-8 statewide assessments, scoring four percentage points higher in ELA and three percentage points higher in Math. • **Increase in the Number of Students with Disabilities Spending 80% or More of the Day in General Education.** The most recent 2024 snapshot data shows that KCS has increased the percentage of students with disabilities spending 80% or more of their day in general education from 69.85% in 2022-23 to 77.3%.	• **Disproportionality in Special Education Identification.** Asian students are 25.26 times more likely to be identified as Intellectually Gifted, 3.37 times more likely with Functional Delay, and 2.71 times more likely with Autism. Black/African American students are 5.13 times more likely to be identified with Functional Delay. Native American students are 2.53 times more likely to have Autism. • **Achievement Gap for KCS SWDs Compared to KCS SWoD.** Over the past five years, the achievement gap between students with disabilities and those without disabilities in KCS on statewide assessments has averaged 26 percentage points in grades 3-8 ELA and 36 percentage points at the high school level. • **Least Restrictive Environment**. Students with Multiple Disabilities (63.3%), Intellectual Disabilities (32.2%), Autism (19.5%), and Developmental Delay (8.6%) are placed in general education settings for less than 40% of the day at higher rates than the District average of 6.1%. • **Higher Rates of Placement Outside General Education**. Asian (22.5%) and Black or African American (19.7%) students are placed in general education for 40-79% of the day at rates exceeding the District average (15.5%).

SUMMARY AND IMPLICATIONS

Analyzing special education data in KCS highlights strengths and areas for improvement in student performance, placement, and identification. One key strength is that students with disabilities in KCS outperformed their peers with disabilities statewide on grades 3-8 statewide assessments, scoring four percentage points higher in ELA and three percentage points higher in Math. Additionally, the District has demonstrated strong inclusive practices, surpassing the state target for placing students with disabilities in general education for at least 80% of the day. According to the 2024-25 snapshot data, 77.3% of students with disabilities are in inclusive settings, compared to the state average of 73.56%. This data reflects the District's commitment to providing students with disabilities greater access to general education. While this is a strength for the District, it is important to monitor which students have access to inclusive educational services and where opportunities exist for students with low-incidence disabilities to be included in the general education setting.

Despite these strengths, the data reveal disproportionality in special education identification, indicating a need for further review of referral and assessment practices. Asian students are significantly overrepresented in specific disability categories, being 25.26 times more likely to be identified as Intellectually Gifted, 3.37 times more likely with Functional Delay, and 2.71 times more likely with Autism. Black/African American students are 5.13 times more likely to be identified with Functional Delay and 2.02 times more likely with Specific Learning Disabilities. Additionally, Pacific Islander students are 2.83 times more likely to be identified with Autism. In contrast, Native American students show a higher likelihood of being identified with Autism and Intellectual disabilities at 2.53 and 2.35 times the rate of their peers, respectively.

Another area of concern is the persistent achievement gap between students with disabilities and their peers without disabilities in KCS. Over the past five years, this gap has averaged 26 percentage points in grades 3–8 English Language Arts (ELA) and 36 percentage points at the high school level. In mathematics, the achievement gap has ranged from 20.1 to 27.4 percentage points in grades 3–8, and from 11.5 to 22.9 percentage points at the high school level during the 2023–24 school year. Placement data further highlights disparities in access to general education. Students with Multiple Disabilities, Intellectual Disabilities, Autism, and Developmental Delay are placed in general education settings for less than 40% of the day at rates higher than the District average of 6.1%. Additionally, Pacific Islander, Asian, and Black or African American students are placed in general education for 40-79% of the day at rates exceeding the District average of 15.5%, raising concerns about access to inclusive education.

These findings suggest opportunities for the District to examine identification and placement practices further to make sure that all students, regardless of race or disability category, receive appropriate supports in the least restrictive environment. Continued efforts to address the achievement gap, review referral processes, and strengthen inclusive practices can help create a more equitable educational experience for students with disabilities in KCS.

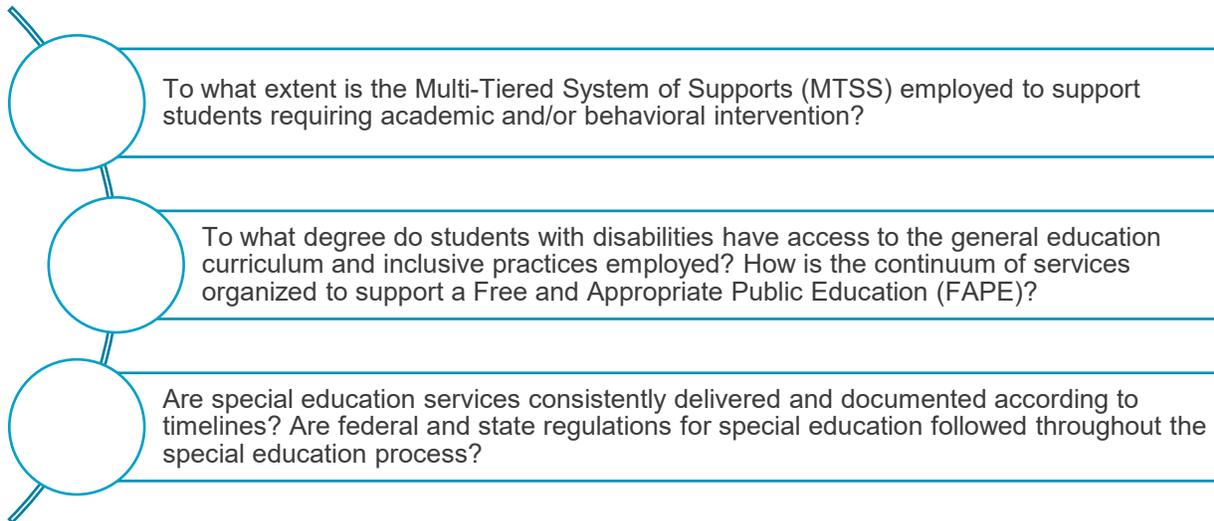# III. LEARNING ENVIRONMENT AND SPECIALIZED SERVICES

OVERVIEW

Within PCG's Special Education Effectiveness Framework, Learning Environment and Specialized Services are part of developing an effective special education system. High-performing special education systems deliver instruction and interventions within an inclusionary framework and with fidelity to the Individualized Education Program (IEP). This leads to increased access and progress in grade-level learning standards and reduced disproportionality in special education.

The main components within this part of the framework include:

- Access to the General Curriculum and Response to Intervention (RTI)/Multi-Tiered System of Supports (MTSS)
- Positive Behavior Interventions and Supports (PBIS)
- Inclusive Practices
- The Continuum of Services
- Adherence to State and Federal Regulations throughout the Special Education Process

These five areas are key to developing a learning environment and specialized services that support students with disabilities meaningfully and proactively. The chapter sections below align with these framework components.

The essential questions we answer in this chapter are:

To what extent is the Multi-Tiered System of Supports (MTSS) employed to support students requiring academic and/or behavioral intervention?

To what degree do students with disabilities have access to the general education curriculum and inclusive practices employed? How is the continuum of services organized to support a Free and Appropriate Public Education (FAPE)?

Are special education services consistently delivered and documented according to timelines? Are federal and state regulations for special education followed throughout the special education process?

Below are the strengths and opportunities within the Special Education Effectiveness Framework's Learning Environment and Specialized Services domain.

Strengths	Opportunities for Improvement
• **Early Childhood Inclusion Target**. The district meets or exceeds the state target for inclusive early childhood settings.	• **MTSS/RTI Fidelity of Implementation.** While the District has an MTSS framework in place, fidelity of implementation across all campuses remains an area of growth.

- **Central Office Commitment.** Demonstrated efforts by the Special Education department to support schools, campuses, and staff across initiatives.

- **Multi-Tiered System of Supports (MTSS) Framework.** The District has developed an MTSS framework to align academic and behavioral interventions with staff training.

- **Shared Inclusive Beliefs.** There is a collective desire for students with disabilities to be included as essential members of the larger school community districtwide.

- **Momentum in Building Early Childhood Special Education Inclusive Programming.** The District has implemented fully inclusive ECSE programming across campuses.

- **Positive Behavior Interventions and Supports (PBIS) Framework**. The District has created a behavioral framework as part of MTSS to support students through the Department of School Culture's Whole Child Support Team (WCST).

- **Compliance with Initial Evaluation Timelines.** Currently, referral practices and eligibility rates for special education and related services negatively impact the District's ability to meet initial evaluation timelines.

- **Suspension Rates of Black Students with Disabilities.** Black/African American and Multi-Racial students with disabilities are suspended at disproportionately higher rates compared to their representation among students with disabilities from other racial/ethnic groups.

- **Expansion of Co-taught Classrooms.** KCS' current co-taught model has considerable limitations, particularly at the elementary school level. Expansion and consistency of the co-taught model with two certified educators is a critical next step for KCS.

- **Identification of Inclusive Practices.** KCS has prioritized increasing the number of SWDs receiving specially designed instruction in the general education setting. Each building and region should memorialize core inclusive practices to master, in partnership with District leaders, to maximize Tier 1 instruction and SDI.

SUMMARY AND IMPLICATIONS

A unified approach to implementing the MTSS/RTI[2] framework is an interdepartmental, collaborative effort. Study participants expressed a need to strengthen behavioral intervention support and more robust Tier II and Tier III behavior supports. Academic-focused RTI[2] practices were identified in District guidance documents but not discussed in great detail by KCS study participants. The structured, tiered academic interventions appear underdeveloped and/or underutilized, with variability from school to school. Intervention selection, implementation fidelity, and staff availability to implement MTSS/RTI[2] interventions are reported as the most significant barriers to success. It is recommended that KCS establish clearer fidelity of implementation and accountability measures for MTSS/RTI[2] across schools, with targeted supports to guide school-based teams in selecting appropriate interventions.

Inclusive practices are considerably more robust in the KCS preschool setting for students with disabilities. All specially designed instruction for preschoolers with disabilities is provided in an inclusive setting via the blended classroom model or in a co-taught classroom. Study participants, staff, and parents acknowledged the incredible benefits of inclusive preschool programming in KCS.

Non-disabled peers admitted to the blended preschool program serve as peer models for preschoolers with disabilities. Staff participants in the study shared a critical perspective regarding the admission of non-disabled peers into preschool programs designed to support inclusive learning environments. Several noted that many peer models—non-disabled preschool students—often enter school without the developmental, social, behavioral, or pre-academic skills typically expected of age-appropriate models. As a result, staff reported providing similar levels of support to both non-disabled peers and students with disabilities, which can limit the effectiveness of the peer modeling approach as initially intended. It was

suggested that a more rigorous application process for non-disabled peer models be implemented to support the success of inclusive preschool opportunities in KCS. Several years ago, a similar request was suggested, such as a more rigorous, formal screening process for preschool peer models. District leaders and Board members assessed the appropriateness and viability of this approach. It was determined that such a process was not feasible due to potential admission biases.

KCS offers "transition" classes within the preschool programming continuum. These classes utilize the blended classroom model for 5-year-olds with disabilities who require an additional year of preschool programming. There are a limited number of "transition" classes throughout the District. While these classrooms fill a critical need, the transition from early childhood special education programming and instruction to K-12 remained a priority for study participants.

The transition from inclusive preschool classrooms to general education kindergarten classes for students with disabilities in KCS was identified as a persistent challenge. Key barriers include significant shifts in staffing structures and increased academic and behavioral expectations. General education kindergarten classrooms typically serve more students with fewer adults, requiring greater student independence in navigating routines, demonstrating appropriate behavior, and meeting instructional demands. Study participants reported that preschool and kindergarten educators are not consistently collaborating to align or adjust expectations, which would help ease the transition for students with disabilities. As a result, some students struggle to meet the demands of the kindergarten setting, impacting their early elementary experience.

KCS has pursued the expansion of co-taught instruction across K–12 settings as part of its broader commitment to inclusive practices. However, the structure and interpretation of co-teaching vary across the District. While District leaders define co-teaching as classrooms staffed by both a general educator and a special educator collaboratively delivering content instruction, this model is not uniformly understood or implemented. In practice, especially in elementary schools, the term "co-taught" is sometimes used to describe classrooms where special education assistants support special educators by implementing accommodations, modifications, or providing behavioral support. The official co-teaching model—as defined by two certified educators working in tandem—is more commonly established in middle and high schools.

Despite the District's efforts, several barriers have hindered full-scale implementation of the co-teaching model. Persistent staffing shortages, including vacancies in both special educator and assistant roles, have forced schools to triage resources, often leading to more students with disabilities being placed in general education classrooms without sufficient instructional support. Current classroom staff may lack the capacity or training to modify instruction or materials appropriately, placing additional strain on already limited resources. Focus group and survey data indicate that these staffing challenges may also contribute to retention issues in key special education positions, thereby perpetuating a cycle that makes sustained implementation of inclusive models more difficult. The lack of consistent structures and a shared understanding of co-teaching expectations across the District has led to confusion among staff and variability in student experiences.

Moreover, the breadth and complexity of student needs in co-taught classrooms—including those of students with disabilities and their non-disabled peers—are becoming increasingly challenging to address. Study participants reported that, while they strive to scaffold instruction and pace content in ways that support mastery for all students, limited planning time and collaboration opportunities have hindered their ability to differentiate effectively. This challenge has not only impacted instruction but is also reflected in student outcomes, contributing to persistent achievement gaps for students with disabilities.

At the same time, KCS has established a foundation for inclusive practices in several schools, as evidenced by positive staff feedback in both surveys and focus groups. To build on this momentum, District leadership should create a cohesive and articulated continuum of inclusive services that all staff

understand and are equipped to implement. This includes clarifying the definition and purpose of co-teaching, aligning staffing models to support it, and providing professional learning to strengthen implementation. Ultimately, every student with a disability should have equitable access to inclusive learning environments and core instruction that support academic growth, regardless of their school or specific special education placement.

Analysis of qualitative data gathered through focus groups and survey responses yielded several key findings related to the organization of KCS's continuum of services. One key finding is the expansion of placement offerings at all elementary schools to allow students with disabilities to remain in their neighborhood schools with their peers. A smaller number of study participants advocated for the increase in the number of self-contained placements, particularly CDC classrooms, across the District. Lastly, it was noted that KCS does not currently have any students placed in out-of-district settings through an IEP team decision. While the District offers a range of in-house programs to meet the needs of students with disabilities, it has allocated funding for out-of-district placements should such services be required to implement a student's IEP.

The continuum offered in KCS has incredible strengths, such as inclusive early childhood programming and robust specialized programming for students with disabilities experiencing behavioral challenges. Students with disabilities in Kindergarten through 12th grade, who are served part of or a majority of the time in general education, have more limited options. KCS has heavily prioritized increasing the time students with disabilities spend in the general education setting while expanding the general education portion of the continuum through more co-taught classes across grade bands. Creating sustainable and high-quality inclusive practices while focusing on LRE should be the next priority to improve academic outcomes for students with disabilities.

From a compliance lens, KCS received a final score of 64.33% in the APR Local Determinations for the 2022-23 school year, resulting in a designation of **"Needs Assistance**."[25] This determination highlights strengths and areas needing improvement in the District's special education services. Additionally, KCS met participation targets for statewide assessments and post-school outcomes. The District successfully prepared students for post-secondary opportunities, with 81.33% of students enrolling in higher education, post-secondary training, or employment, surpassing the required benchmark.[26] While assessment participation rates were strong, academic proficiency and graduation rates need improvement. The District must take corrective actions, particularly in early childhood and dropout prevention. KCS's APR individual elements within the local determination summary are outlined below for the 2022- 23 SY.

Cross-referencing the referral data trends from the SY23-24 with KCS's historical performance on Indicator 11 (Child Find) suggests that compliance with timelines for initial evaluations is an area of growth. Specific evaluation supports are needed at the preschool and high school grade bands for different reasons. The high volume of referrals in preschool and the lower eligibility rate for special education and related services indicate that preschoolers are likely to be over-referred. This can create an undue burden for KCS evaluation staff responsible for screening and possibly completing unnecessary evaluations. Alternatively, while fewer students are referred for special education in high school, the eligibility rate remains relatively high, particularly in 8th, 10th, and 12th grades. High referral rates in the upper grades may indicate missed opportunities for earlier identification and intervention. It is recommended that KCS special education leaders analyze student-level referral trends and their impact on evaluation teams to develop proactive referral and assessment strategies that support earlier identification and reduce the need for late-stage referrals. Another key consideration is the impact of ongoing school psychologist vacancies on referral and evaluation findings in this report.

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[25] Tennessee Department of Education. (2023). *LEA APR indicator summary 2022-23*. Tennessee Department of Education. https://www.tn.gov/content/dam/tn/education/special-education/lea_apr_indicator_summary_2022-23.pdf
[26] Ibid.

Staffing and resource allocation challenges are perceived to impact the District's ability to meet special education compliance metrics. Study participants expressed concerns about the availability of resources needed to support special education effectively. While some perceive the regionalized structure as amplifying resource challenges, the structure was designed to respond more to building-level needs. Additionally, while staffing shortages remain a common concern, later sections of this report analyze caseload data to provide a more comprehensive understanding of staff distribution. Other factors, such as access to professional development, instructional materials, and specialized support services, may also contribute to these concerns and warrant further examination.

KCS can refine and enhance staff's understanding of special education law and regulatory compliance expectations. However, staff perceptions around the compounding effects of critical vacancies (i.e., school psychologists) cannot be underscored when establishing a strong foundation and making strides towards high-quality outcomes for students with disabilities in KCS.
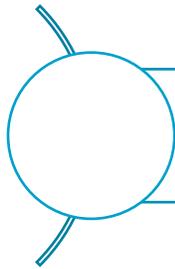
IV. HIGH EXPECTATIONS

OVERVIEW

This section includes increasing expectations of students with disabilities by having a growth mindset and presuming competence while incorporating culturally relevant and growth-oriented practices. The main components of this domain include:

- Growth Mindset
- Presumed Competence
- Positive Learning Environment
- Student Engagement

These areas foster a culture of high expectations and set the stage for academic optimism when working with students with disabilities.

While all framework domains are critical to developing an effective special education system, this portion of the framework grounds districts in a culture of high achievement and presumed competence. The chapter below aligns with these framework components.

The essential question we address in this chapter is:

To what extent does KCS implement a rigorous process to systematically monitor educational benefit? How do IEP teams determine services and placement?

Below are the overarching strengths and opportunities within the High Expectations domain of the Special Education Effectiveness Framework.

Strengths	Opportunities for Improvement
• **Dedicated Educators and Strong Instructional Practices**. Across multiple settings, staff demonstrated commitment to student success, with some classrooms serving as strong models for instructional excellence.	• **Enhancement of Specialized Reading Interventions**. While Wilson has been implemented with fidelity, further evaluation is needed to support alignment with current research on the Science of Reading.
• **Respect for Students with Disabilities**. Survey data indicate that students with disabilities are treated with respect by both staff and peers across schools.	• **Variability in Co-Teaching Practices**. Some co-teaching models are collaborative, while others rely on a "one teach/one assist" approach, limiting special education teacher engagement.
• **Embedded Opportunities for Student Interaction**. Most staff report that students with and without disabilities have structured opportunities to interact in academic and non-academic settings.	• **Access to Grade-Level Curriculum**. Some students with extensive support needs have limited opportunities for inclusion in general education.

- **Successful Transition Programming**. Project SEARCH provides students with disabilities meaningful employment experiences, strong community partnerships, and structured job support.

- **Specialized Behavior Programming at the Elementary Level**. Specialized programming observed at the elementary level effectively integrates academic and social-emotional learning through individualized instruction and positive reinforcement strategies.

- **Commitment to Literacy Instruction**. Wilson Reading is implemented with fidelity, supporting structured literacy instruction for students with disabilities.

- **Focus on Maximizing Time in General Education**. Most staff (81%) report that IEPs are designed to maximize students' access to general education settings, reinforcing the district's commitment to inclusive practices

- **High-Quality Special Education Programs and Services**. 70% of staff believe their schools' special education programs and services are of high quality, highlighting a strong foundation for continued improvement.

- **Technology-Based Interventions Require Monitoring**. KCS relies on programs like Language Live and Amplify. Monitoring student progress can ensure these tools effectively support instruction rather than replace direct teaching.

- **Inconsistent Curriculum Modifications**. Uncertainty exists regarding who is responsible for modifications, leading to inconsistent implementation across schools.

- **Lack of Training on Modifications**. Staff report limited training on modifying curriculum effectively while maintaining high expectations for students with disabilities.

- **Shifting from Compliance to Meaningful Implementation of IEPs**. While IEPs are being developed to meet legal requirements, there is an opportunity to move beyond compliance and enhance instructional quality so that IEP goals genuinely support student growth.

- **Balancing Decision-Making with Data-Driven Practices**. There is an opportunity to strengthen the use of data in eligibility and service decisions to prevent overreliance on accommodations and align student placements with instructional needs rather than external pressures.

SUMMARY AND IMPLICATIONS

KCS has demonstrated a commitment to high expectations and inclusive practices for students with disabilities, as evidenced by strong specialized programs and a focus on structured literacy instruction. Programs such as Project SEARCH at the secondary level and structured behavioral interventions at the elementary level highlight the District's ability to implement best practices that support academic and social-emotional development. However, variability in instructional practices, inconsistent approaches to curriculum modifications, and limited collaboration between general and special education teachers present areas for growth. Survey and focus group data suggest that while educators believe in maintaining high expectations, challenges in training, co-teaching structures, and instructional practices impact effective implementation.

Observations indicated that Wilson Reading is being implemented with fidelity as a specialized reading intervention. However, its integration with the general education English Language Arts (ELA) curriculum appears limited. While Wilson is designed to provide explicit, structured literacy instruction for students with significant decoding and encoding needs, a lack of intentional alignment with core classroom instruction may result in missed opportunities for reinforcing general education content and vocabulary. This disconnect can lead to student disengagement, as students may struggle to see the relevance of the intervention to their broader academic experience. Greater coordination between intervention specialists and general education teachers could help bridge this gap and support more cohesive literacy development for students with disabilities. Similarly, co-teaching models vary widely, with some

classrooms demonstrating strong collaboration while others rely on an assistive approach that limits the role of special education teachers. Technology-based interventions are used across the District, yet the balance between direct instruction and digital learning requires further examination to ensure students receive high-quality instruction. Enhancing professional development, refining curriculum modification protocols, and strengthening collaboration between general and special education staff will provide access to rigorous academic content.

Our analysis of survey data, focus groups, and interviews on IEP development and service delivery reveals misalignment between district policies, implementation practices, and student outcomes. While survey and focus group data suggest general confidence among staff in developing compliant, data-driven IEPs, focus groups and interviews reveal significant challenges, including overwhelming workloads, inconsistent collaboration, and external pressures that influence decision-making. Staff report spending excessive time in IEP meetings—often at the expense of direct student support—and struggling with large group sizes, limited access to instructional materials, and inadequate training. Additionally, concerns about the overuse of accommodations, inappropriate student placements, and parental influence on eligibility decisions raise questions about the effectiveness of current processes in truly supporting student growth.

These challenges have direct implications for student outcomes, particularly as students with disabilities continue to underperform across the District. A lack of consistency in service delivery, coupled with perceived staffing shortages, workload, and administrative burdens, limits the ability to provide high-quality, individualized instruction. Furthermore, staff morale is negatively impacted by the reactive nature of special education, where issues are often addressed only when problems arise and successes are not celebrated. To improve student achievement, the District must prioritize a strategic approach to special education staffing, professional development, and instructional support that moves beyond compliance and focuses on meaningful, student-centered progress.

V. HUMAN CAPITAL AND LEADERSHIP

OVERVIEW

This domain within the framework emphasizes the critical role of leadership and human capital in creating an effective special education system. Leadership is essential for fostering a culture of collaboration, accountability, and student-centered decision-making, where school administrators and staff share ownership of students' success with disabilities. Effective leadership also involves coordinating efforts with community organizations to enhance outcomes for these students.

Equally important is the investment in human capital, ensuring that staff, from recruitment to retirement, are highly qualified and continuously trained to meet the diverse needs of learners. High-quality staffing, strategic caseload management, and ongoing professional learning are vital components. Critical practices should focus on recruiting and retaining teachers with the right skills and passion, placing them in the right schools, and providing them with the professional development they need to succeed. When leadership and human capital align, they create a powerful force for improving student outcomes in special education.

The essential questions we answer in this chapter are:

> How does KCS organize and utilize its human capital resources?

> How does KCS organize its leadership to support special education and foster a culture that is focused on improving outcomes and post-secondary preparation?

Below are the overarching strengths and opportunities within the Human Capital domain of the Special Education Effectiveness Framework.

Strengths	Opportunities for Improvement
Special Educator Licensure: All special education teachers in the District are fully licensed by the state, and most KCS special education teachers hold a professional teaching license.	**Review Workloads for Related Service Providers**: While caseload sizes generally align with professional recommendations, KCS should examine workload requirements for related service providers in conjunction with student needs to determine whether related service personnel caseloads are equitable and allow for timely service provision per IEPs.
Retention and Recruitment Efforts: The District offers a $7,000 stipend paid across multiple years to support the recruitment and retention of special education teachers.	**Review Staffing Assignments for Students with IEPs Attending Certain Campuses**: Some schools have caseloads significantly higher than the district average. A workload analysis of these and "F-rated" campuses in the District would determine whether special education teacher staffing is adequate to meet student needs in these locations.
Special Education Educational Assistants: Special education educational assistants are allocated at higher rates to KCS schools where students served by special education make up higher percentages of overall enrollment (20% and greater). While many of the district's schools enroll students with IEPs at rates higher than Tennessee and federal averages, the	

district should continue to prioritize the assignment of special education educational assistants to campuses demonstrating student need.

- **Professional Development:** KCS offers a variety of PD topics for educators and other staff that balance regulatory requirement compliance with strategies to support positive student outcomes.

- **Organizational Structure**: KCS's regionalized structure enables more targeted school support, allowing leadership to address specific needs more effectively.

- **Ombudsman Role**: The Ombudsman provides guidance and support to families navigating the special education process, helping them understand policies, access resources, and make informed decisions.

- **Professional Development:** The District should regularly assess staff's learning needs to establish PD offerings that align with those needs and consider actionable on-demand learning options for frequently requested topics.

- **Collaborative Structures for Leadership Teams**: Communication and collaboration between KCS and school-level leadership are inconsistent, leading to variability in support and implementation across schools.

- **Stakeholder Voice**: Some staff perceive that parent advocacy strongly influences KCS priorities, and they feel there is an opportunity to create a more balanced approach that also incorporates staff feedback and needs.

- **Due Process Proceedings**: KCS has been involved in several hearings over the years, reflecting the need for strengthened collaboration, communication, and problem-solving between families and the District.

SUMMARY AND IMPLICATIONS

KCS has fully licensed special education teachers assigned to serve students with IEPs across the District's campus, with 64% of KCS special education teachers holding professional teaching licenses and 34% holding practitioner licenses. The District also employs a variety of related services staff to provide services to students with IEPs and implements a professional development system that provides ongoing training opportunities across compliance and student-outcomes focused topics for special and general education staff. Additionally, KCS has taken steps to recruit and retain special education teachers through an ongoing $7,000 stipend distributed across three years. Stakeholder perception data reveal this to be a well-received program and a strength of the District.

Average staffing ratios for special education teachers are consistent across the District when comparing the districtwide average to campus averages. Analysis of special education educational assistant (educational assistant) allocations indicates smaller educational assistant to student ratios in schools where students served by special education make up a higher proportion of overall enrolled students. School type and accountability ratings do not appear to correlate with staffing assignments for special education teachers or educational assistants. Focus group themes and surveys reflect a perception among District stakeholders that there is a shortage of special education staff in KCS, impacting IEP development and leading to challenges for related service providers in meeting IEP service time requirements. While related service providers serve many students across KCS, caseload sizes do not exceed limits as national professional associations recommend. Caseload analyses for special education teachers indicate that while, on average, there is consistency in special education teacher and special education educational assistant allocations across schools, there are wide ranges in caseload size between schools, with some special education teachers assigned caseloads of 40 or more students. In contrast, special education teachers at other District schools have much lower caseloads. This is similar to comparing special education educational assistant assignments across campuses.

The District should review caseload sizes for related service providers in relation to staff workload requirements and student needs to determine whether current caseloads are sustainable, equitable, and

allow students to receive timely services per their IEPs. Similarly, the District should review staff workload responsibilities for special education teachers and special education educational assistants per student needs at campuses with high staff-to-student ratios and caseloads to determine whether current staffing patterns allow for the timely provision of services per student IEPs. The ongoing impact of school psychologist vacancies on the provision of special education and related services, particularly referral and evaluation practices, should continue to be monitored. KCS has implemented various short-term solutions to support school-based staff and students. It is plausible that the perception of insufficient special education staff, expressed by study participants, is linked to the compounding effects of school psychologist vacancies. KCS should continue to recruit for these roles and monitor how workloads related to the provision of special education in buildings across KCS are managed.

While KCS provides various professional learning opportunities for general and special education staff, stakeholder feedback from surveys and focus groups highlights a need for additional training and ongoing support. In particular, stakeholders noted that general education teachers would benefit from targeted professional development to strengthen their ability to support students with disabilities in their classrooms further. Staff also reported the need for learning opportunities related to the characteristics and impact of disabilities on learning, collaborative teaching, behavioral supports, and appropriate special education referrals, among other topics.

Best practices in professional learning emphasize that training should not be a one-time event but an ongoing process that includes coaching, collaboration, and follow-up support to help educators integrate new strategies into their daily practice. To foster meaningful and sustained change, KCS should consider incorporating job-embedded coaching, peer collaboration, and opportunities for reflection into its professional development model. Additionally, gathering data regularly on the most relevant training topics for different roles within the District can help inform professional learning offerings.

Stakeholders also suggested that the District explore asynchronous learning options. If pursued, these opportunities should focus on delivering short, accessible, and actionable content that staff can engage with on demand. This approach would allow educators to access high-impact learning when needed, reinforcing key concepts through continuous exposure and practical application rather than isolated training sessions.

KCS has made significant strides in strengthening its leadership structures, communication efforts, and support for families navigating the special education process. Staff recognize improvements in goal-setting, professional development, and data-driven decision-making, all of which contribute to a more structured and strategic approach to supporting students with disabilities. The Ombudsman role, parent training initiatives, and increased visibility of District leaders in schools have helped create stronger relationships between families and the District, giving parents a point of contact to address concerns and access resources. Additionally, the effort to shift more leadership of special education back to school teams has provided building administrators with greater ownership of their programs, better aligning special education services with the daily operations of schools. This shift supports Principals in leading special education programming and compliance within their buildings, where they have a deeper understanding of their students' needs and staff capacity to implement best practices effectively.

Despite these efforts, challenges remain in communication and collaboration at the District and school levels. Feedback suggests that while the District is moving toward a more collaborative leadership model, some staff and community members still perceive decision-making as inconsistent or influenced by external pressures. A recurring theme is the balance between valuing parent advocacy and recognizing educators' professional expertise in determining appropriate student support and placements. Some staff feel that parent concerns, particularly when voiced through legal challenges, are given more weight than the input of school-based teams. This has led to tensions around placement decisions, disciplinary actions, and access to specialized services.

At the school level, special education leadership varies, with some schools demonstrating strong collaboration between general and special education staff, while others struggle with alignment. Differences in administrators' understanding of special education processes have contributed to inconsistent implementation of supports and referrals, impacting staff confidence and student outcomes. Supervisors and facilitators play a crucial role in bridging these gaps, but there remains a continued need for clarity in roles, responsibilities, and expectations to create consistency across schools.

Another area of concern is the increasing reliance on litigation to resolve disputes. While legal proceedings are sometimes necessary to protect student rights, the frequency of due process filings suggests an opportunity for the District to strengthen proactive problem-solving strategies. The District has largely successfully resolved cases through mediation, and judicial rulings in key cases affirm its adherence to IDEA standards. However, the involvement of external legal advocates, including the Public Defender's Office, highlights the need for continued reflection on transparency, clear documentation, and structured decision-making processes to prevent disputes from escalating into formal legal challenges.

KCS can build upon its strengths by reinforcing proactive communication strategies, refining leadership structures, and creating pathways for shared decision-making between parents, staff, and District leadership. Strengthening training on procedural safeguards, manifestation determinations, and placement decisions can equip school teams with the tools to navigate complex cases effectively. By refining these approaches, the District can continue to foster a more collaborative and solutions-oriented approach to special education, reducing the need for adversarial proceedings while providing students with the high-quality supports they need.

VI: SYSTEMS AND STRUCTURES

OVERVIEW

This domain in the framework emphasizes the importance of systems and structures within an effective special education system. This includes defining expectations for resource allocation, funding mechanisms, and data management infrastructure to guide data-driven decisions.

This domain includes the following key areas for effective systems and structures in special education:

- School-Based Staffing Practices
- Resource Allocation
- Equitable Funding

The essential question we answer in this chapter is:
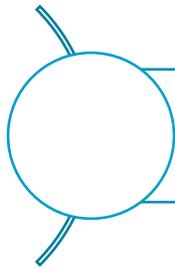
> How does KCS allocate resources in a way that facilitates maximum return on district investment? How does school-based staffing align with best practices in supporting students with disabilities?

Below are the strengths and opportunities within the Systems and Structures domain of the Special Education Effectiveness Framework.

Strengths	Opportunities for Improvement
• **School-based Special Education Staff Vacancies.** Almost 90 percent reduction in special education staff vacancies from 90+ vacancies in FY23 to 10 vacancies in FY24.	• **Impact of Vacancies on Special Education Staff Workloads.** While quantitative data does not indicate chronic vacancies in special education staffing for special educators or special education educational assistants, study participants consistently reported that vacancies, even short-term, compound workload challenges and impact student outcomes. Addressing these concerns requires ongoing monitoring and responsive, in-time staffing adjustments.
• **Investment in Certified and Classified Staff Salaries.** KCS approved 4 percent and 8 percent increases in base salaries for school-based staff.	
• **Alignment in Budget Priorities.** Findings from the KCS community budget stakeholder engagement study align with priorities identified by participants in this comprehensive special education review (investment in KCS staff to promote recruitment and retention).	• **Special Education Expenditures.** Special education expenditures continue to increase disproportionately faster than additional funding mechanisms to supplement increased costs.
	• **Workload vs. Caseload Analysis.** The District has not conducted a comprehensive workload analysis to assess whether staffing perceptions align with actual needs for supporting students with disabilities. A systematic review could

	provide a clearer understanding of staffing demands and guide resource allocation. • **Educational Assistant Staffing and Allocation.** The District does not have a structured process for determining when to hire new special education educational assistants and when to reallocate existing staff based on student needs. Establishing formal protocols can promote efficient resource use while maintaining appropriate student support.

SUMMARY AND IMPLICATIONS

The number of special educator and special education educational assistant vacancies decreased from 99 in FY2023 to 10 in FY2024, representing a 90 percent decrease in one fiscal year. It was anecdotally reported that this significant decrease does not account for the rolling number of positions that continue to be added to support the provision of special education and related services in KCS. An approximately $5 million increase in funding for staffing was added to the District's personnel budget; however, the growth in staffing needs and requests continues to outpace budget allocations. Concerns about the sustainability of personnel staffing budgets in KCS are explored in greater detail within this report. However, it is critical that the narrative surrounding special education staffing in KCS accurately reflects the evolving and complex nature of these demands.

The snapshot vacancy data referenced above is not cumulative and does not account for attrition rates among special educators or special education educational assistants. As noted by study participants, a purely numerical analysis cannot fully capture the compounding impact of vacancies in critical special education positions. The significant decrease in vacancies reflects a districtwide effort to recruit special education staff and address ongoing perceptions about chronic vacancies that could affect service delivery.

Quantitative analysis of numerical staffing data does not suggest that KCS is understaffed to provide FAPE for students with disabilities. A deeper analysis of student needs on individual caseloads would yield more nuanced findings to determine if KCS special education staff can truly offer FAPE as outlined in the TDOE guidelines. Additionally, some KCS campuses could benefit from analyzing staffing allocations based on student-to-teacher and special education educational assistant ratios.

Recruitment and retention efforts are a priority for District and school-based staff alike. KCS employs approximately 4,300 teachers with an 89% retention rate, indicating a need to hire over 450 teachers annually.[27] Survey data gathered by KCS identified staffing as a key barrier to success in special education.[28] KCS has implemented several initiatives to enhance special education services and improve teacher retention. Individuals filling special education teaching positions are offered a $7,000 signing bonus. A comparable signing bonus is not provided to individuals filling special education support roles.

Retention efforts must focus beyond pay increases. Opportunities for KCS staff, within and outside of special education, to talk through shared experiences surrounding the provision of special education across the district are a way to foster a greater sense of community. Public acknowledgement of special

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[27] Knox County Schools. (2023, June). *Quarterly report: Teacher retention and staffing updates*. Knox County Schools. https://www.knoxschools.org/cms/lib/TN01917079/Centricity/Domain/1105/QuarterlyReport0623.pdf

[28] Knox County Schools. (n.d.). *Special education council and teacher assistant vacancies report*. Knox County Schools. Retrieved February 18, 2025, from https://www.knoxschools.org/site/default.aspx?DomainID=963&FlexDataID=179278&ModuleInstanceID=53858&PageID=5160&PageType=3&RenderLoc=0&ViewID=6446EE88-D30C-497E-9316-3F8874B3E108&utm

education achievements and a concerted effort to highlight positive experiences for students with disabilities and their families is an important stepping-stone to reframe what was described as a negative perception of special education in KCS. Special education district-level and school-based staff serving students with disabilities should receive public and personal acknowledgement of their collective efforts. Acknowledgement of special education "wins" by no means diminishes the concerns raised by parents and community members. All individuals invested in the positive outcomes of students with disabilities must unify around this shared goal and work towards a balanced perspective.

KCS is experiencing some attrition, like other districts nationwide, with teaching staff leaving their current roles. Attrition rates for special education staff were not provided to PCG or analyzed formally as part of this study. As expressed during focus groups, the perception from some school-based staff characterized the situation as more dire than what is reflected in district-level retention data reports.[29] Campus-based staff reported that special education staff (educators, assistants, related services providers, etc.) leave KCS due to the compounded workload resulting from vacant positions. Other KCS staff shared feeling disheartened or fear of potential public criticism. KCS study participants acknowledged that they believe some parents are happy with the special education services provided by the District. The lack of support for KCS special education staff at the District and school-house levels has impacted morale to varying degrees.

KCS special education expenditures should continue to be closely monitored. Budgetary sustainability is key when considering the addition of FTEs and programmatic expansion. Before embarking on large-scale initiatives, small-scale pilot projects and analysis of programmatic effectiveness should be considered. District leaders have already begun considering ranking priorities before pursuing other funding options, such as taking a salary loss to accommodate salary increases for school-based staff.

Trust and shared perspective on special education budgetary decision-making continue to evolve in KCS. It is recommended that workload analyses, staff utilization, and the utility of current staff determination practices be implemented with fidelity to inform future budgetary decisions and to avoid staffing cuts where appropriate. Staffing projections and clear expectations for fostering a culture of collaboration in resource allocation must be carefully managed to maintain a balance between supporting FAPE and sustaining fiscal responsibility.

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[29] Knox County Schools. (2023, June). *Quarterly report: Teacher retention and staffing updates*. Knox County Schools. https://www.knoxschools.org/cms/lib/TN01917079/Centricity/Domain/1105/QuarterlyReport0623.pdf

VII: FAMILY AND COMMUNITY ENGAGEMENT

OVERVIEW

This section of the framework focuses on family and community engagement as part of a high-performing system that includes all stakeholders in the education process by embracing partnerships to make informed decisions and provide meaningful opportunities for all students.

This domain includes the following key areas for effective family and community engagement in special education:

- Communication and Collaboration
- Training and Resources
- Access

Focusing on these three areas fosters partnerships between students, staff, and families, creating a cohesive system focused on student-centered learning and outcomes. This report section summarizes findings from over two thousand families from focus groups and survey responses from over eighty campuses.

The essential question we answer in this chapter is:
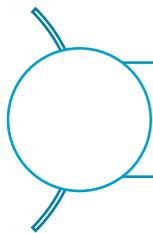
> To what extent are parents of children with IEPs satisfied with their child's educational program?

Parents are a child's first teachers and are essential partners as their children progress through school. Their vital role is acknowledged in IDEA, which requires parental input in writing IEPs, the provision of related services, and placement. IDEA also requires collaboration with parents and students with disabilities, as appropriate, to design special education along with related and supplementary services. This review evaluated the parents' role and satisfaction with special education processes and instructional/service delivery within KCS.

Below are the strengths and opportunities within the Special Education Effectiveness Framework's Family and Community Engagement domain.

Strengths	Opportunities for Improvement
Special Education Teachers. Parents acknowledge that KCS special education teachers are caring and dedicated, work in the children's best interest, and are responsive.	**Trust-Building.** Some parents report inconsistent collaboration, communication, and transparency between KCS and stakeholders, especially regarding parent concerns, student progress, and service updates, contributing to mistrust in special education leadership.
Students as members of the school community. Parents believe their children are valued, members of the school community, and safe at school.	**Inconsistent Practices.** Some parents noted inconsistencies in placement and service decisions, raising concerns about a lack of clear policies, procedures, and data-driven decision-making.
IEP Meetings. Parents understand IEP documents, feel heard by teachers and	

administration, and feel comfortable asking questions to teachers and administration.

- **Parent Training and Resource Awareness**: Parent training opportunities and resources are not widely utilized or well-known, indicating a need for increased awareness and accessibility.

- **Language Accessibility.** Not all families who needed interpretation support at IEP meetings or translated IEP documents receive them.

- **Playground Accessibility**. Parents have expressed concerns that some playgrounds and school campus areas are not fully accessible to all students, regardless of mobility needs.

SUMMARY AND IMPLICATIONS

Overall, parents expressed positive feedback about the special education programs in KCS. Many parents felt their children were valued and welcomed as part of the school community, with teachers and campus leadership promoting an inclusive environment. Special education teachers received frequent praise for their dedication and collaboration, with parents noting that these educators had their child's best interests at heart. This positive rapport extended to IEP meetings, where parents felt comfortable asking questions and believed their input was heard and respected.

However, opportunities remain to strengthen communication and collaboration between parents and the District, particularly regarding progress reporting and lapses in services. Both parents and KCS staff identified the need for greater consistency, transparency, and timeliness in communication with the District's special education office. Additionally, while most parents who attended District-provided trainings or information sessions found them helpful, awareness of these offerings remains low. Expanding outreach and increasing access to these trainings could help engage more families. Strengthening collaboration between KCS and the Parent Empowerment Council, which hosts parent training sessions, may provide a meaningful opportunity to bridge existing gaps between families and the District.

While the majority of families navigate the special education process collaboratively with the District, there are instances when disagreements arise between families and the District regarding student needs and services. These disputes, often rooted in deeply held concerns about what is best for students, can sometimes escalate into legal proceedings, which can be financially and emotionally taxing for all involved. For families, the process can feel overwhelming and adversarial; for the District, defending its special education practices can divert resources and attention away from broader system-wide improvements.

Moving forward, there is an opportunity for both families and the District to work towards strengthening trust and fostering open, solutions-oriented dialogue. A commitment to transparency, communication, and a shared understanding of student needs, grounded in data and best practices, can help shift the focus from contention to collaboration. Ensuring that all stakeholders feel heard and valued in decision-making will benefit individual students and families and contribute to a stronger, more inclusive special education system that equitably serves all students.

Additionally, access remains a concern for families with language and mobility needs. Some parents reported that interpreters were not always provided at IEP meetings when needed, and that translated IEP documents were not consistently available. Creating a clear and systematic process to meet these

needs would help ensure all families can fully participate in their child's education. Similarly, concerns were raised regarding the accessibility of some school buildings and playgrounds for students with mobility needs. Conducting a thorough review to identify and address accessibility challenges could help KCS ensure access for all students.

By fostering collaboration, increasing transparency, and addressing systemic challenges, KCS can build a stronger, more inclusive special education system that works in partnership with families to serve students best.

VIII: RECOMMENDATIONS

<div style="background-color:#1ba1cd; color:white; text-align:center; font-weight:bold;">LEARNING ENVIRONMENT AND SPECIALIZED SERVICES</div>

1. Multi-Tiered Systems of Support (MTSS)/Response to Intervention (RTI). Build on the MTSS/RTI processes and framework to implement a unified and clear structure for all students' academic achievement, positive behavior, and social/emotional learning.

Action Steps:

- **1.1 - Strengthen Core (Tier 1) Instruction.** Focus on analyzing all students' expectations, quality, and provision of strong and rigorous core instruction. Further, to raise achievement for all students who struggle, KCS needs to implement best practices for teaching reading with fidelity and ensure that students with mild to moderate disabilities benefit from these best practices.

- **1.2 – Master Scheduling**. Develop special education master scheduling professional learning opportunities to support schools in implementing schedules that effectively integrate special education services. Solidify the partnership across offices within the district leadership structure that prioritizes special education being at the forefront of scheduling initiatives to ensure shared planning and collaboration opportunities. It is recommended that district leaders make collaborative master scheduling a requirement. Building leaders, with the shared support of district offices, should focus on designing schedules that provide appropriate supplemental instruction while avoiding the unintended replacement of core instruction.

- **1.3 - Consistency in Implementation of MTSS/RTI Framework.** Build on KCS's momentum in creating an MTSS framework to prioritize appropriate intervention selection and fidelity of implementation. Clarify MTSS/RTI implementation expectations to address insufficient staffing concerns, particularly in implementing Tier II or III interventions.

- **1.4 – Professional Development**. Provide staff with professional development on how to use the current MTSS module that is designed to be an early warning dashboard and intervention management system to support data collection and decision-making within the District's MTSS framework

2. Results Driven Accountability (SPP/APR) Indicator Monitoring. Develop a systematic data analysis process for analyzing RDA required data points and review the data regularly to determine trends and patterns over time. Use these data to inform referral/screening/assessment strategies (specifically for students in preschool and high school), staffing allocations, and appropriateness of practices, and to monitor the implementation of these recommendations

Action Steps:

- **2.1—Tracking Activity Timelines.** Analyze timelines to assess whether there are delays in providing interventions, determining student progress, initiating a special education evaluation (based on data and by referral type), and completing assessments.

- **2.2 - Tracking Eligibility Identification Rates.** Utilize technology and train building leaders to track eligibility rates to determine trends in their buildings, including disability classification and race/ethnicity. Analyze longitudinal data routinely to determine if campuses require additional support in refining eligibility determination practices.

- **2.3 - RDA/SPP Data Monitoring.** Track students' IEP outcomes by school, specific to test scores, graduation rates, drop-out rates, and post-school outcomes (the basis of RDA), and set a goal to exceed the state target for each. Make school-level data readily accessible to building leaders and collaborate on developing and implementing a plan to support their efforts in improving these outcomes. Establish a system to monitor all SPP indicators every quarter and hold data review sessions to evaluate data trends and root causes of challenges.

- **2.4 - Follow-up Action.** Develop any additional written guidance to clarify procedures and practices, consider any extra resources and strategies required, along with a written plan, if appropriate, and provide training to support building leaders in understanding the special education process, compliance, and regulations. For example, identification practices training would include the implications of race/ethnicity/language, socio-economic status, and cultural constructs for school-based teams when considering students for an evaluation or eligibility determinations.

3. Fair Identification and Placement Practices: Improve referral, evaluation, and placement processes to reduce disproportionality in special education identification and support balanced access to inclusive settings.

Action Steps:

- **3.1 - Review and Refine Referral Processes**. Conduct an in-depth analysis of referral patterns by race and disability category to identify potential biases and inconsistencies in special education identification.

- **3.2 - Implement Culturally Responsive Evaluations**. Provide professional development for evaluators and educators on culturally responsive assessment practices to promote data-driven identification and placement decisions.

- **3.3 - Expand Inclusive Supports**. Develop targeted supports to increase access to inclusive education for student groups more frequently placed in restrictive settings.

- **3.4 - Ongoing Data Monitoring**. Establish a districtwide system for regularly reviewing special education identification and placement data disaggregated by race to track trends and inform decision-making.

ACADEMIC RIGOR AND HIGH EXPECTATIONS

4. Strengthen the Alignment of Specialized Reading Interventions. Align specialized reading interventions with the latest research on the Science of Reading by providing targeted professional development and implementing a structured progress monitoring system to track student growth and instructional effectiveness.

Action Steps:

- **4.1 - Inventory Current Practices**: Review current research on the Science of Reading and compare it with the District's existing reading interventions.

- **4.2 - Professional Development:** Provide professional development for educators on evidence-based literacy strategies and the Wilson Reading System.

- **4.3 - Progress Monitoring**: Continue monitoring existing progress systems to assess student literacy outcomes and make necessary instructional adjustments.

5. Increase Access to Grade-Level Curriculum for Students with Disabilities. Examine current inclusion practices and implement strategies to expand access to grade-level curriculum for students with disabilities by providing professional development on Universal Design for Learning (UDL) and increasing the use of appropriate supports, accommodations, and modifications in general education settings.

Action Steps:

- **5.1 - Assess Current Practices:** Continue to evaluate existing inclusion practices by building and region to identify areas where student access to grade-level content can be improved.

- **5.2 - Professional Development**: Provide professional development on Universal Design for Learning (UDL) and differentiated instruction to enhance student access to grade-level content.

- **5.3 - Develop a Plan**: Develop a districtwide framework to support students with disabilities in general education classrooms by establishing standardized guidelines for implementing accommodations and modifications that support access to grade-level content across all schools.

6. Enhance Training in Curriculum Modifications. Provide targeted professional development to support staff in understanding when and how to modify curriculum appropriately while maintaining rigorous academic expectations for students with disabilities.

Action Steps:

- **6.1 - Implement Districtwide Training**: Continuing to offer and strengthen structured training sessions on effective curriculum modifications, clarifying when they should be applied and who is responsible for implementing them within the general education setting.

- **6.2 - Provide Ongoing Coaching and Support:** Provide instructional coaching for general and special education teachers to support the consistent and effective implementation of modifications in alignment with student needs.

LEADERSHIP AND HUMAN CAPITAL

7. Strengthen Collaborative Structures within Leadership Teams. Establish clear structures and expectations for communication and collaboration between District and school-level leadership, making decision-making processes more transparent, inclusive, and aligned with best practices.

Action Steps:

- **7.1 - Develop Consistent Communication Channels**: Implement regular, structured opportunities for collaboration between District leaders, school administrators, and special education teams to improve alignment and transparency.

- **7.2 - Clarify Roles and Decision-Making Authority**: Review and adhere to existing guidance on the responsibilities of school leaders, supervisors, facilitators, and special education teams to promote consistency in implementation and reduce gaps in support. Prioritize consistency in messaging that KCS instructional practices and priorities apply to all students and reaffirm this messaging of inclusivity in internal and external opportunities.

- **7.3 - Balance Stakeholder Engagement**: Establish structured processes incorporating parent perspectives and educator expertise in decision-making to foster collaboration while maintaining effective practices.

- **7.4 - Enhance Leadership Support and Training**: Continue to offer ongoing professional development and targeted support for building administrators as they take on a more significant leadership role in special education for their buildings, equipping them with the tools needed to implement best practices effectively as instructional leaders. Partner with leaders in the KCS Academics Division to increase attendance at bi-weekly principal trainings and identify other professional development opportunities unique to building administrators.

8. Review Workloads for Special Education Staff: Examine workload requirements for special education staff in conjunction with student needs to determine whether related service personnel caseloads are equitable and allow for the timely provision of services per student IEPs.

Action Steps:

- **8.1 - Collect Workload Data and Input**: Gather specific input and data on unique needs of students served from special education staff across roles to determine the level of effort needed to implement timely services for current caseloads, other job responsibilities, and identify any challenges impeding service delivery. Continue offering individualized training and support for school teams responsible for implementing IEPs that include modified content.

- **8.2 - Adjust as Needed**: Based on a review of student needs data and staff input, distribute caseloads for special education staff in a way that reflects individualized student needs, facilitates the timely implementation of IEP services, and upholds the provision of FAPE. Facilitate ongoing communication with building leaders and district staff managing budgets to calibrate staffing needs based on this data.

9. Expand Professional Learning Opportunities for Staff: Establish actionable learning opportunities that provide staff in general education, special education, and related services with timely access to meaningful professional development.

Action Steps:

- **9.1 - Identify Resources to Gather Staff Input:** Explore channels for gathering timely input from staff about presenting challenges/needs for professional learning.

- **9.2 - Collect Input from Staff About PD Needs**: Establish a regular data collection schedule for obtaining staff input on professional learning topics and needs.

- **9.3 - Establish On-Demand Learning**: Develop asynchronous/on-demand learning options that address frequently requested learning topics for staff across roles.

- **9.4 – Leverage Staff:** Leverage the expertise of current staff and model classrooms to create ongoing, embedded professional learning opportunities. Rather than relying on single-session training, implement a coaching model that provides continuous, in-class support to help staff refine and sustain effective instructional practices over time.

SYSTEMS AND STRUCTURES

10. Cross-Departmental Collaboration and Staffing Allocations. Facilitate annual conversations between campus and special education leadership to align instructional goals and plans for the academic growth of students with disabilities, moving beyond a strictly formulaic staffing model. Establish a funding reserve for mid-year staffing adjustments within the approved budget, ensuring flexibility to meet evolving student needs.

Action Steps:

- **10.1 - Annual Campus Budget Planning Meetings:** Develop a process whereby central office DSE staff converse with leadership at each campus annually during the school budgeting process to determine special education teacher and educational assistant allocations. This should include any processes or protocols developed to justify adding special education staff using a data-driven approach. During these meetings, campuses must bring their instructional plans for serving students with disabilities (including how schools will support greater access to general education for students with more significant needs and/or in specialized programs), along with projected caseloads and schedules.

- **10.2 - Create Flexibility in Staffing**: In cases where caseloads exceed a realistic provision of FAPE, as outlined in TN guidance, individual special educators should consider splitting FTEs between schools to allow for more flexibility in service provision.

- **10.3 - Monitoring Placements:** Establish a technology solution and expectations for monitoring placements and movement along the services and support continuum for students with disabilities by disability classification, race/ethnicity, etc., so that staffing adjustments can be made in real time and KCS can regularly assess the degree to which additional special education staff are needed to provide FAPE.

11. Develop an Action Plan. From these recommendations, develop an action plan that is transparent and shared with stakeholders to monitor progress from these recommendations for the next 1-5 years.

Action Steps:

- **11.1 - Strategy to Execution Action Plan:** Develop a detailed and transparent action plan to guide the implementation of the recommendations in this report.

- **11.2 - Monitor Progress:** As part of the action plan, develop transparent and widely accessible key performance indicators (KPIs) and publish KCS's progress on the action plan at least twice per year. This will enable district leadership at the central office and schools to assess any barriers to implementation and highlight key successes.

FAMILY AND COMMUNITY ENGAGEMENT

12. Increase Communication Consistency: Standardize communication protocols to foster clarity, timeliness, and effectiveness in interactions among schools, families, and District offices.

Action Steps:

- **12.1 - Standardize Communication Protocols:** Develop clear expectations for timely and consistent communication between schools, families, and District offices, including regular updates on student progress, program changes, and lapses in services.

- **12.2 - Centralize Family Contact Information:** Create a centralized communication platform to manage parent inquiries, track responses, and support relevant staff follow-through.

- **12.3 - Empower Families**: Provide resources such as guides or FAQs to help families understand District policies and know whom to contact for specific concerns.

13. Rebuild Trust: Cultivate trust and enhance partnerships through collaboration and increased transparency.

Actions Steps:

- **13.1 - Increase Transparency:** Share specific steps the District's special education department takes to improve practices and communication and demonstrate an understanding of the perceived lack of transparency.

- **13.2 - Provide Opportunity for Stakeholder Input:** As processes and procedures are written, updated, or revised, incorporate input from a diverse range of voices to reflect a commitment to collaboration and transparency and leverage current parent groups to support this process.

- **13.3 - Celebrate Success**: Hold space to showcase and publish success stories of students, teachers and/or community partnerships.

14. Improve Accessibility: Strengthen access to parent trainings for all parents, IEP meetings, and documents for families whose first language is not English, and playgrounds and school campuses for students with mobility needs

Action Steps:

- **14.1 - Improve Outreach**: Use diverse communication methods, in multiple languages, including social media, and school-level outreach, to inform families about available training opportunities and find ways to increase engagement with families. Leverage staff members assigned to improve outreach and collaboration with families, focusing on relationship building.

- **14.2 - Strengthen Translation Systems.** Develop a process for providing interpreter support for all families at IEP meetings. Additionally, IEP documents and other essential materials should be translated so all parents can access special education information in their first language.

- **14.3 - Assess Campus and Playground Accessibility**: Identify playgrounds and areas of the school campuses that are not accessible for all students, regardless of mobility needs.

FROM STRATEGY TO EXECUTION

The secret to successful strategy execution is in translating strategies into actions. Further, tracking progress on an organization's strategy execution is integral to understanding whether it will reach its desired future state. From our experience, the most challenging part of a comprehensive program evaluation for a school district is moving from the recommendations to a concrete action plan, then to a change in practice. These steps require significant focus, in addition to organization, communication, and collaboration across departments. Implementing change across often siloed and independent departments, with differing priorities and reporting structures, requires out-of-the-box thinking and a commitment to approaching issues and solutions in a new light.

While school districts take different approaches to managing this process, the most successful ones create a sustainable structure with internal and external accountability measures and strong cross-departmental advocates. PCG recommends a five-step Strategy Execution process that results in grounded, sustainable organizational change.

PCG recommends that KCS address each component of our Strategy Execution Process to position the district to make lasting, impactful changes.

PCG'S STRATEGY EXECUTION PROCESS

Structure Milestones for Initiatives

Action plans must include concrete, measurable milestones that can be assessed regularly. These milestones break down initiatives into manageable steps and timelines. This structure is essential, especially given the school year cycle and the urgency with which KCS would like to move these critical initiatives forward. Given the nature of the initiatives, progress toward milestones should be reviewed monthly through the 2025-26 and 2026-27 school years.

Develop a Tracking System with KPIs

Key Performance Indicators (KPIs) must be established for each measurable milestone. Reviewing these KPIs will help KCS assess where each initiative stands. By monitoring these KPIs frequently, KCS can assess barriers and adjust plans early in the process if needed. It is often the case that defining metrics or KPIs is the step that allows teams to recognize challenges within the theory of action that impact their action plan.

Communicate the Objectives

To implement new policies and procedures, organizational changes, or new approaches, stakeholders need a solid grasp of the initiatives, the objectives, and the benefits the plan will bring. Communicating progress on each key initiative is equally essential to ensure continued support from those impacted by the changes and the associated stakeholders.

Monitor Progress and Review Outcomes

Action plans are more likely to succeed when staff are deeply involved with the implementation process and there are monthly status checks on progress toward established objectives. At this point, it is also critical to celebrate real progress and hold individuals who have not "delivered" accountable.

Make Plan Adjustments as Necessary

An action plan is not an unchangeable document. It is a fluid plan that should be revised and updated as the KCS environment changes and grows. Openness to revising the action plans will enable KCS to adjust to shifting fiscal and regulatory realities and changing priorities. If KCS's core leadership team sees progress on specific initiatives falling short of expectations, reevaluating the original objectives and approach may be needed. However, assessing the causes of discrepancies between actual and planned results is also essential.