

Office of the Independent Monitor

March 7, 2017

Discussion Paper

Outcome 13 Alternatives

In May 2014, the Office of the Independent Monitor (OIM) provided the Plaintiffs' Counsel and District (the Parties) a discussion paper to assist in the reexamination of the appropriateness of Outcome 13's duration target and exploration of potential alternatives to measuring progress. The paper highlighted structural limitations of Outcome 13. Since the 2012-2013 school year, the Independent Monitor (IM) has repeatedly expressed concerns regarding the District's lack of progress with meeting the outcome's duration target and the structure of the measure itself.

At the request of the Plaintiffs' Counsel, the OIM—in collaboration with the Office of Data and Accountability (ODA) and Dr. Michael Norman—conducted various activities to better understand the challenges with the current measure of Outcome 13 as well as potential alternatives for improving service delivery.

This paper is intended to facilitate discussion between the Parties and provide alternative methods for ensuring service delivery and overall compliance. It also aims to address the requirement to establish clear standards for the correction of deficiencies or noncompliance within the Substantial Compliance framework, which require a system to:

- Call for the immediate cessation of the violations
- Initiate steps to prevent recurrence
- Identify actions to correct the violation
- Identify documentation and timeline for correction
- Eliminate or cure any harmful past effects of the violation

Alternative methods should address systemic issues and weaknesses that contribute to systemic noncompliance as well as limitations within the current accountability structure. The alternatives are based on the following assumptions:

- The District will not meet the duration target within the next two years
- The purpose of the outcome is to ensure students with disabilities get the services specified within their Individualized Education Program (IEP)
- There is a reasonable method to determine the District's capacity to deliver services and identify and remediate noncompliance
- Parents should be informed regarding the delivery of their children's services
- The efforts of the alternative outcome will result in building systemic capacity to ensure compliance consistent with the Substantial Compliance framework and beyond the tenure of the Modified Consent Decree (MCD)

Current Outcome:

By June 30, 2006, 93% of the services identified on the IEPs of students with disabilities in all disability categories except specific learning disability will show evidence of service provision. In addition, by June 30, 2006, 93% of the services identified on the IEPs of students with a specific learning disability will show evidence of service provision.

By June 30, 2006, the District will provide evidence that at least 85% of the services identified on the IEPs of students with disabilities have a frequency and duration that meets IEP compliance.

For the purposes of assessment of frequency, provider absences will not constitute evidence of non-provision of service if such absence is the result of short-term (maximum two consecutive weeks) illness, family emergency or jury duty. Student absences/no shows will not constitute evidence of non-provision of service. For the purposes of assessment of duration, sessions not completed as the result of conflicts with a student's school schedule or late arrival/early departure by a student will not constitute evidence of an incomplete session.

Intent of Current Outcome:

- To increase the number and percentage of students with evidence that they are receiving services as specified within their IEP
- To increase the amount of services students receive to meet the frequency and duration of sessions prescribed within their IEPs
- Overall, the District must increase the percentage of students with evidence of service provision to 93%. The District must also show that 85% of these students received the total number of sessions and for the complete duration time as specified in students' IEPs

Progress to Date

The first part of the outcome requires students to show evidence of at least one service session during the study's eight-week timeframe. It contains two measures to differentiate between students eligible with a specific learning disability (SLD) and all other disabilities. The District continues to meet these targets (Table 1). The target for students without SLD was met in 2008-2009, and students with SLD only, in 2007-2008.¹ Despite this high performance, the study does not explore the reasons or causes that result in 2-3% of the students not receiving any services.

These findings are consistent yet slightly better than the percentage of students with no evidence of service delivery as reported in the SER300 - Historical Report (3.6%) (Table 3). The availability of both sources allows for drawing a reasonable conclusion that approximately 1,640 to 3,280 (2% to 4% of 82,000) students are not receiving any services at any point during the school year. For these students, the response to this noncompliance is unknown and not subject to accountability for purposes of the MCD.

Table 1. Percentages of students receiving at least one session (all other disabilities vs. SLD)

	Population without SLD	SLD Only
2015-16	97.7%	97.2%
2014-15	98.1%	97.6%
2013-14	96.4%	96.2%

To date, the District has met the frequency target and is considerably short of the duration target (Table 2). The District met the frequency target in 2012-2013 but fell below the target the subsequent year. For the past two years, the frequency target has been met and sustained. During the 2015-2016 school year, all services met the frequency target except occupational therapy (OT [83%]) and speech and language (LAS [81%]). Although this performance meets the outcome's standard, an examination of those cases that missed sessions provides insight into challenges for meeting this target and areas of systemic weaknesses.

Almost half (48%) of the cases that did not meet the frequency requirement were missing one session. Some services missed more than one session, particularly two that are daily or instructional supports with a higher number of sessions prescribed per month. For those that missed more than one session, the

¹ The SLD only target was met in 2007-2008 and 2009-2010, but fell below the target in subsequent years.

services with the highest rates of multiple missed sessions include: nonpublic agency behavior intervention implementation (NPA-BII) - 83%, resource specialist program (RSP) - 64%, and school mental health/ERICs counseling (SMH) - 51%. For several years, the study has recalculated performance to allow the inclusion of students with one missed session (1 out of 8 sessions or 87.5% of their services). This recalculation can be viewed as providing an estimate of students getting most of their services. By including these students, performance increases to 92% of students having received 87.5% of their services. Although the 300 reports focus on meeting the duration targets of a student's prescribed service, they do not allow for an alternative view of performance of the frequency target.

The IM's Fall 2016 report noted that the "lack of progress with the targets of this outcome, particularly the duration target, has been a dark cloud over the prospect of disengagement" (p. 5). Since the 2011-2012 school year, progress toward the duration target has been relatively stagnant (70.2%: 2011-12, vs. 70.5%: 2015-16). These findings provide sound evidence that the District is unlikely to meet this target and outcome. In the 2015-2016 Services Study, the only services to meet the duration target were physical therapy (PT [87%]) and deaf and hard of hearing (DHH [85%]). Performance of many services is considerably lower than the 85% target, with the following demonstrating the lowest duration rates: NPA-BII (45%), RSP (67%), SMH (71%), LAS (74%), and adapted physical education (APE [79%]).

Similarly, the 2015-2016 Services Study recalculated performance, allowing students with the equivalent time of one missed session (87.5% of their services) to determine performance at a lower standard. The inclusion of these students increased performance to 81%. This means that 81% of students received at least 87.5% of their services. Of those that missed the duration target, daily or higher-frequency services had the highest rates of missing more than one session, and include: RSP – 80%, NPA-BII – 78%, and APE - 54%.

The SER300 – Historical Report also provides insight into students getting most of their services. Although concerns exist over the accuracy of the data due to the unknown impact of overcounting of make-up sessions or student absences, 74.6% of all students are receiving services in Tier 1 and 2, meaning they received between 90-100% of their services. When including students in Tier 3, 83.5% of students received 80% or more of their services.

Although direct comparisons of performance from both measures (Services Study and 300 report) cannot be made, it is evident that many students are not receiving at least 87.5% (81% - Services Study) or 90% (74.6% - 300 report) of their services.

Table 2. Percentage of Students Meeting Frequency and Duration of Services (IM 2016 Annual Report)

	Frequency	Duration
2015-16	85.3%	70.5%
2014-15	87.4%	72.4%
2013-14	84.4%	67.7%

Over the course of the MCD, the District has dedicated many resources to develop the Welligent system's capacity to capture, maintain, and report service delivery data. Outcome 13 relies on Welligent service-tracking log data and service prescriptions on students' IEPs. Performance is based on the methods as stipulated in the outcome, which includes some instances for credit when sessions are missed. Although these business rules are favorable to the District, progress has remained stagnant for the duration target. Comparisons with the District's 300 reports of service provision must be made cautiously. However, it is important to review and consider this data and performance, as the methods of Outcome 13 will not continue beyond the MCD, and the Welligent system must be deemed reliable for monitoring.

The OIM has repeatedly questioned the business rules of the 300 reports and expressed concerns for the over- or double-counting of services when sessions are made up, or when a student is coded as absent and provided the service another day. Focus group and interview participants expressed concerns regarding the accuracy of these reports and noted discrepancies between the reports and service-tracking logs when reconciling data. While it is clear that the business rules and accuracy of the reporting must be addressed, the data and reports have undoubtedly become a monitoring tool and part of a provider's service delivery responsibilities. The use of and reliance on these reports is currently systemic; therefore, improving these reports' capacity and accuracy should be viewed as critical for determining disengagement.

Although the concerns with the accuracy of data are valid, the District's 300 report provides an alternative source of service delivery performance. These concerns are somewhat less for students in the lower thresholds, or Tiers 5 and 6, because it is unlikely business rules that result in overcounting have much of an impact, and cases where a provider failed to document a session will be part of the process for remediating noncompliance.

The reports include performance thresholds for informing providers and staff of service provision at the student, site, and District levels. The six tiers of service delivery are:

- Tier 1 – 100%
- Tier 2 – 90% to 99.9%
- Tier 3 – 80% to 89.9%
- Tier 4 – 50% to 79.9%
- Tier 5 – 0.01% to 49.9%
- Tier 6 – 0.0% or no services

The District's Historical SER300 report (Table 3) shows service delivery between August 1, 2016, and February 23, 2017. As noted above, 74.6% of all students received 90% or more of their services, and 83.5% received more than 80%. These data demonstrate how performance, measured by Welligent, falls considerably short of 90% (Tiers 1 and 2). The following services had the lowest percentages of students in Tiers 1 and 2:

- OT - 71.3%
- LAS – 72.3%
- SMH/ERICS – 71.1%
- Visually impaired services (VI) – 74.8%
- Least Restrictive Environment (LRE) – 77.0%

The historical report is also indicative of the ongoing noncompliance, which requires ongoing monitoring and remediation. The table shows the magnitude and impact of students not getting any or very few of their services in Tiers 5 and 6 (n=4,036, 7.4%). Furthermore, about one out of six students is getting less than 80% of their services, or those in Tiers 4 through 6 (n=8,974, 16.5%). Unlike the data reported in the Services Study, the 300 reports identify noncompliance at different thresholds, and at any given time. This capacity allows for the remediation of noncompliance at the student level, and in a timely manner.

Table 3. SER300 Historical Report (August 1, 2016, to February 23, 2017)

Service	Tier 1 100%		Tier 2 90- 99.9%		Tier 3 80- 89.9%		Tier 4 50- 79.9%		Tier 5 0.01- 49.9%		Tier 6 0.0%		Total
	n	%	n	%	N	%	n	%	n	%	n	%	
APE	4,092	56.8	2,085	28.9	491	6.8	284	3.9	116	1.6	142	2.0	7,210
VI	341	62.7	66	12.1	31	5.7	41	7.5	22	4.0	43	7.9	544
DHH	1,312	74.5	146	8.3	70	4.0	103	5.9	47	2.7	82	4.7	1,760
LAS	15,977	52.9	5,863	19.4	2,906	9.6	2,980	9.9	1,350	4.5	1,106	3.7	30,182
LRE	181	65.8	31	11.3	4	1.5	23	8.4	13	4.7	23	8.4	275
OT	5,589	56.3	1,485	15.0	1,018	10.3	1,153	11.7	370	3.7	299	3.0	9,919
PT	1,265	77.8	117	7.2	97	6.0	69	4.2	30	1.8	49	3.0	1,627
SMH/ ERICs	1,643	54.8	488	16.3	242	8.1	280	9.3	148	4.9	196	6.5	2,997
Total	30,400	55.8	10,281	18.9	4,859	8.9	4,938	9.1	2,096	3.8	1,940	3.6	54,514

Summary

Based on data from the Services Study (70.5%) and the SER300 Historical Report (55.8%), the District is falling well below the outcome's duration target, which requires 85% of students to receive 100% of their services. Given the lack of progress over the past several years, there is clear evidence that the current duration target is unlikely to be met.

The availability of data from both systems allows for deeper insights into potential alternatives to Outcome 13. Furthermore, the tier system provides information on various levels of compliance, which can be linked to a student, provider, and school. This capacity, and the District's ongoing efforts to monitor and improve documentation, provides a foundation for an alternative approach that can build on these systems while improving those that are sustainable and enhance parental involvement.

Although data from the 300 reports need to be validated and the business rules for these reports must be reviewed and in some instances modified, the focus of the proposed alternative allows for these activities to be done concurrently and should not delay efforts to work toward the targets of the new outcome, upon agreement by the Parties.

POTENTIAL OUTCOME 13 OPTIONS

Three options are included for consideration on Outcome 13. The first two are based on the current structure, while the last is a new approach. The third approach incorporates elements required for fulfilling the Substantial Compliance framework. Each includes possible language for an outcome as well as pros and cons for each option. Although performance data are included in the discussion, the accuracy of the data from the 300 reports has not been validated. It is also assumed that additional data will be retrieved and reviewed during the discussion process.

OPTION 1. MAINTAIN THE CURRENT OUTCOME AND MEASURE

This option is to continue with the current targets and methods for measuring service delivery. Limitations within the structure of the outcome, which requires students to get all of their services, make it unlikely to be met. After several years of stagnant duration progress, the measure yields very little improvement toward disengagement. Continuation of the outcome, and successful completion of the targets, will not address the elements required by the Substantial Compliance framework, which requires systemic capacity to identify and remediate noncompliance.

Pros-

- Status quo - Nothing new to the field
- Comparable performance data

Cons-

- Reliance on a monitoring effort (Services Study) that will become obsolete at the conclusion of the MCD
- Does not address systemic weaknesses that impact service delivery
- Does not address weaknesses within the accountability structure
- Does not differentiate between low- or high-performing schools or providers, or students that are getting the majority or few of their services
- All-or-nothing measure: students must get 98%-100% of their services to be counted under current structure
- Discrepancy between Welligent and study business rules. Welligent no longer contains codes for missed services consistent with the study, such as those for provider absences
- Duration for RSP and BII services unlikely to be met given the complexities of the service delivery model and structural systemic weaknesses
- Current model of service prescription, high caseloads, and multiple site assignments limit capacity to make up services
- Solutions revolve around the documentation practices of services, and not improving the service delivery system
- Does not require the District to intervene and remediate instances of noncompliance
- Does not address the capacity for ensuring systemic substantial compliance for identifying and remediating noncompliance

OPTION 2. RENEGOTIATE CURRENT OUTCOME TARGET AND METHODS

This option would modify one of the three targets (particularly, frequency or duration), maintaining the current structure that requires a percentage of students to receive a percentage of their services. For example, the outcome might require 90% of students to receive 90% of their services (duration). However, modification of the outcome's targets and methods and successful completion of these new targets will not address the elements required by the *Substantial Compliance* framework that requires systemic capacity to identify and remediate noncompliance.

Possible modifications to the methods of the outcome include:

- Solely focus on compliance with the duration target
- Expand the timeframe for measuring service to six months or the entire school year
- Use of the Welligent tracking system and 300 reports to evaluate performance
- Modifications to the study's business rules, which include reasons for allowing missed sessions
- Exclusion of higher-performing related services

Pros-

- Status quo - Nothing new to the field
- Capacity for monitoring service delivery exist within Welligent and potential to replace eight-week study method and third-party monitoring system
- Reducing the duration target would allow the counting of students getting most or the majority of their services (e.g., 92%) compared to the current method that requires students to get all of their services (e.g., 98-100%)

Cons-

- Reliance on a monitoring effort (Services Study) that will become obsolete at the conclusion of the MCD
 - Transitioning to the Welligent service-tracking system requires validation of the accuracy of data and possible modification to business rules
- Does not address systemic weaknesses that impact service delivery
- Does not address weaknesses within the accountability structure
- Does not differentiate between low- or high-performing schools or providers, or students that are getting the majority or few of their services
- Duration for RSP and BII services unlikely to be met given the complexities of the service delivery model and structural systemic weaknesses
- Current outcome's methods and business rules allow missed sessions to be given credit (e.g., provider absences). These rules would no longer apply
- Given the performance reported in the Services Study and 300 report, lowering duration target alone might not result in meeting the outcome within two years
- Current business rules for 300 reports create discrepancies between service delivery logs and reports (under- and overreporting), limiting the confidence in accuracy of data
 - Given the inaccuracies of the data and inability to determine if sessions are overcounted, this performance might overestimate service provision for these levels
 - Lack of confidence in data for determining baselines for Tier 1 through 3 and would require validation of data
- Solutions revolve around the documentation practices of services, and not improving the service delivery system
- Does not require the District to intervene and remediate instances of noncompliance

- Does not address the capacity for ensuring systemic substantial compliance for identifying and remediating noncompliance

OPTION 3. ALTERNATIVE OUTCOME 13.

The following option aims to improve service provision while focusing on the systemic weaknesses that impact service delivery and accountability. The outcome is designed to focus on solutions within management's control. It is also focused on building capacity to identify and remediate noncompliance as well as promoting parent involvement. It deemphasizes the current focus on documentation practices and monitoring that often result in providers confirming that students received the majority of their services. The alternative outcome contains four parts that are designed to address:

- Students who are getting a few or no services (approximately 20% of students getting less than 80% of their services)
- Schools uncovered by providers, and processes for notifying parents of the provision of interim and compensatory services
- Increasing the capacity for identification and remediation of noncompliance and mitigation of past harm, consistent with the Substantial Compliance framework
- Site-level accountability for RSP and BII services
- Parent involvement and transparency

OUTCOME 13A – Remediation of students receiving less than 80% of their services (All Services)

Proposed Outcome –

The District will address students in Tiers 4, 5, and 6² and deliver services to a level of Tier 3 or higher (80%-100%) within the following timelines

- 70% of students in Tiers 4, 5, and 6 will be in Tier 3 or higher within 30 days
- 80% of students in Tiers 4, 5, and 6 will be in Tier 3 or higher within 45 days
- 90% of students in Tiers 4, 5, and 6 will be in Tier 3 or higher within 60 days

For students who are not served at Tier 3 or higher within 30 days, the District will send parents of the impacted student a letter with an offer of compensatory services.

Pros –

- Aims to ensure that students receive most of their services within the current service delivery structure
 - Allows management and providers to direct and target efforts and resources for 20% of the lowest served students, unlike the current outcome, which does not differentiate between high and low levels of compliance
 - Addressing problems with the model for prescribing services, caseload and workload considerations, and multiple site assignments can occur concurrently, but are not dependent for progress toward this outcome
- Requires the remediation of nonservice for students in Tiers 4, 5, and 6, yielding credible action toward a solution and/or the mitigation of past harm from the violation, placing accountability where control lies
- Promotes ongoing student- and site-level monitoring, intervention, reporting, and solutions

² Students in Tier 6 resulting from a lack of provider assigned at that site are the focus of Outcome 13B

- Current measure focused only on aggregate and doesn't lead to remediation or solutions
- Promotes a timely response to noncompliance and process for parent notification
- Promotes further capacity building of efforts consistent with the requirements from the *Substantial Compliance* framework
- Reinforces service delivery and accurate documentation by providers, as those with students in Tiers 3 and above would be relieved of scrutiny and experience less stress and reduced workload
- Accuracy of data for students getting less services, such as those in Tiers 5 and 6, is less likely to be impacted by overcounting and current business rules

Cons –

- Relies on the accuracy of the Welligent service-tracking data
 - Requires addressing the business rules of the 300 reports to ensure the accurate reporting of service delivery in order to reconcile and limit instances that under- and overreport service provision
- Less emphasis on students receiving most or the majority (80-100%) of their services
- Resource limitations
- Current accountability structure might not readily support the actions required for the remediation and/or mitigation of past harm

OUTCOME 13B***Proposed Outcome -***

For those students in Tier 6 due to a provider vacancy or leave, the District will do the following:

The District will identify schools uncovered by related service providers:

- Within 10 days of the school being uncovered, the District will notify parents, in writing, of the school's lack of provider and include a list of nonpublic agencies (NPAs) to provide interim services until the school is covered
 - For anticipated leaves, the District must provide notification to parents 15 days prior to the provider's leave
- The District will report monthly on uncovered schools and include information on the status of the vacancy and/or search for a provider
 - The report will include information on the status of service provision of all students attending uncovered schools:
 - Date when parents were provided with letter notifying them of the lack of service provider and with the list of NPA providers
 - Date when an NPA was selected and began providing services
 - Date when District personnel or substitute was assigned and began providing services
 - If a District provider is deployed to provide coverage, the District must provide information of that individual's current assignment and caseload, to ensure that other students do not become impacted as a result

Monthly status updates will be provided to the OIM, Plaintiffs' Counsel, local district Special Education Service Center Administrators (SESCAs), local district superintendents, and impacted site principals.

Pros -

- Focuses on students getting no services and provides credible options for remediating noncompliance
- Promotes ongoing student- and site-level monitoring, intervention, reporting, and solutions
 - Current measure focused only on aggregate and doesn't lead to remediation or solutions

- Promotes a timely response to noncompliance
- Requires a timely and uniform process for notifying parents of no service and options for obtaining interim services
- Promotes capacity building of efforts consistent with the requirements from the *Substantial Compliance* framework
- Promotes targeted interventions and accountability

Cons –

- Resource limitations
- Potential to overextend existing resources from nontargeted sites
- Current accountability structure might not readily support the actions required for the remediation and/or mitigation of past harm

OUTCOME 13 C.1 – Increasing accountability for the provision and documentation of RSP and BII services**Resource Specialist Program (RSP)*****Proposed Outcome –***

The District will require site principals to certify, on a monthly basis, that they have reviewed RSP tracking logs and that services have been delivered accordingly

- The certification will include information regarding the accountability steps taken (progressive discipline) for providers who do not provide 80% or more of services according to students IEPs and/or accurately or timely enter service-tracking logs
 - A plan for making up missed services and notification to parents must also be included

Pros –

- Establish accountability mechanisms centered on site-level administration
 - Requires prioritization by local district superintendents and directors for the delivery of special education services and documentation
- Promotes accountability within the current structure that provides site-level administrators the authority to evaluate the performance of RSP teachers
- Enables variability between RSP service delivery models and focuses on accountability for service delivery and accurate documentation
- Can be modeled after existing monthly certification methods required by site principals

Cons –

- Requires the authorization of the Superintendent of Schools
- Dependent on the capacity and willingness of local district superintendents and directors to hold principals accountable

OUTCOME 13 C.2 - Behavior Intervention (BII)***Proposed Outcome -***

- Identify a baseline timeframe for the procurement of a designated provider and a timeframe for establishing an interim plan to deliver services:
 - 90% of students with BII services will have the BII provider assigned within 60 days
 - 95% of students with BII services will have an interim plan that identifies the individual or individuals who will provide these supports within 48 hours

- Develop procedures similar to those required for the comprehensive evaluation of students identified with an emotional disturbance. A process should ensure implementation and fidelity of Tiers 1, 2, and 3 supports, and ensure an appropriate assessment that includes the identification of the target and replacement behaviors to be addressed by the BII services, prior to the IEP meeting when BII services are being considered.
 - 90% of students with BIIs will receive Tier 1, 2, and 3 supports, prior to the IEP. IEP teams must certify and identify the implementation of these supports prior to the IEP meeting
 - This requirement may be waived for students with significant behavioral concerns newly enrolled in the District
 - 90% of students will receive a comprehensive evaluation that identifies the target and replacement behaviors to be addressed by the BII
 - All students with BII services must have a behavior support plan with periodic progress reports provided to parents

Pros –

- Promotes the implementation and enforcement of existing policies and procedures for providing behavioral interventions (REF Guide 5052.1 - Tiers 1-3 supports)
- Promotes the implementation and enforcement of existing policies and procedures for conducting preparatory activities, including conducting an appropriate assessment, prior to the IEP meeting when a BII is being considered
- Promotes accountability for the timely procurement of a designated BII provider and an interim service plan
- Requires a behavior support plan for all students with a BII
- Removes the SESCAs from the authorization process, which is inconsistent with the corrective actions of the OIM's IEP Complaint Investigation that requires the IEP team to have the authority to delegate services
- Promotes clarification and fidelity to a criterion when qualifying for BII services

Cons –

- Does not address training and capacity issues of BIIs
- Does not address missed sessions due to provider absences

Outcome 13 D - Increase of site-level accountability and parental involvement of service delivery (MiSiS – Parent Portal)***Proposed Outcome –***

By July 30, 2018, the District will develop and pilot monthly or periodic reports within the MiSiS Parent Portal to inform parents of service delivery. Full implementation of these reports will commence during the 2018-2019 school year.

- The service delivery reports should be simple and enable parents to view the number of sessions delivered over a specified timeframe, and include reasons for services that were missed
- Business rules must be fixed to ensure accurate reporting
- Welligent documentation must be simplified and may vary by service type (e.g., LAS vs. APE)

Pros –

- Promotes parent involvement and communication with school administrators and service providers
- Promotes transparency and access to service delivery records
- Promotes student- and site-level monitoring, solutions, and accountability

- Promotes capacity for a system that ensures substantial compliance consistent with the Substantial Compliance framework
- Promotes accountability
- Promotes equitable access to student data for families or parents of students with disabilities

Cons –

- Shift from current model, which does not promote transparency
- Current 300 reports would not adequately support this effort
 - Current Welligent 300 report business rules must be reconciled to ensure accurate reporting of service delivery data
- Requires resources to build a module within MiSiS Parent Portal
 - Timeline for the development and implementation of this module is unknown