

State of Oklahoma

Part B SSIP Narrative: Phase III Year Four

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Introduction

The Oklahoma Part B program, with full support of stakeholders, has decided to embark on a new State Systemic Improvement Plan (SSIP) beginning in 2020. Stakeholders and leadership determined that the previous SSIP was not meeting the needs of the state or its students as planned, though several improvement strategies were successfully implemented. Oklahoma is currently working through phases I and II of the new SSIP, and implementation and evaluation (phase III) will begin in late fall, 2020.

Thus, this report has two parts: the first reviews the fourth and final year of implementation of the most recent SSIP, which concluded in December 2019. Final implementation summaries of each strategy are also provided. The second section proposes a new state-identified measurable result (SIMR) that will be the focus of the new SSIP, and provides an update on the status of the new plan as of March 2020. Attached to this report are two appendixes: "A" has the theory of action for the former plan, and "B" presents the full details of various components of Phase I for the new SSIP, as required in the Measurement Table for the APR. This report introduces the new SIMR and describes the broad data and infrastructure analyses conducted to this point; the root cause analyses, selection of coherent improvement strategies and theory of action have not yet been completed. These components will be presented in the 2021 SSIP report.

Section One: The SSIP Conclusion

This section of the Phase III Year Four Part B SSIP Narrative Report presents a fourth and final year review of the overall SSIP, the SIMR and each implementation strategy. The strategy reviews include a description of completed activities, stakeholder engagement and evaluation.

The FFY 2013 to 2018 SSIP concluded in December 2019 to allow time for the final report and planning for the next SSIP. In FFY 2013, Oklahoma Part B SSIP stakeholders decided to focus on improving literacy in early education and to use third grade reading assessment scores as the SIMR. The area targeted for improvement was Tulsa County, containing between fourteen and twenty-two LEAs annually (depending on the count of charter schools in a given year). The original targets were set above 50 percent, but were adjusted twice to reflect new proficiency expectations resulting from changes in the state's content standards and assessments. The final version of the SIMR was stated as:

By FFY 2018, Oklahoma will see improved early literacy performance in specific districts in Tulsa County among students with disabilities taking the 3rd grade annual reading assessment. The passing rate (proficiency or above) in Tulsa County will increase from 14.9 percent in FFY 2016 to at least 15.5 percent in FFY 2018. Participating districts will also realize statistically significant improvement in the rate of growth toward proficiency among these students.

To achieve this SIMR, the Oklahoma State Department of Education Office of Special Education Services (OSDE-SES) adopted six improvement strategies to implement in Phase III. The first two strategies focused on state-wide infrastructure improvements. The remaining four were practice interventions in Tulsa County districts that targeted challenges discovered during the Phase I analysis. The six strategies were:

System-focused, State-wide Infrastructure

1. Develop data tracking mechanism for children exiting SoonerStart (Oklahoma's Part C early intervention program) and entering an LEA;

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2. Implement a new differentiated monitoring system that incorporates performance measures, such as reading assessment performance;

Site-specific Support (Evidence-based Practices)

3. Improve parents' engagement in students' use of accommodations & assistive technology (AT) for instruction and assessment;
4. Improve educators' knowledge of accommodations & AT for instruction and assessment;
5. Provide access to early literacy resources for families with 3-5 year olds at intervention sites; and
6. Provide targeted professional development to LEA personnel in evidence-based practices in early literacy.

The activities selected for implementation were expected to lead to substantial improvements in infrastructure and parent and teacher knowledge and skills in literacy, to encourage improved performance on the third grade reading assessment for all students with disabilities with IEPs. Some strategies were more successful than others at achieving their objectives and outcomes, though each one benefited its specific participants. Overall however, implementing these strategies has not had a clear impact on the SIMR as measured at the county level.

SIMR Data

After a significant one year decline from FFY 2016 to 2017, the third grade reading proficiency rate in Tulsa County dramatically increased again in FFY 2018, achieving a rate that is statistically equivalent to the state target of 15.5 percent (see Table 1). We do not have an evidence-based reason explaining the one year increase. The factors and challenges outlined in the year three narrative that were believed to lead to the 2017-2018 decline are still in effect, but do not appear to be having a singular effect on the Tulsa SIMR scores this year. In particular, Oklahoma has had a very high rate of teacher turnover in recent years and an associated upsurge in emergency certifications among general education teachers.

Of all 22 LEAs in Tulsa County in school year 2018-2019, 17 had third grade test-takers. Of these, nine districts were above the state target, and six were substantially higher, with proficiency rates greater than 25 percent. Eight were below the target, with three at zero percent proficiency. Sand Springs Public Schools, which was a target district for strategies five and six, had a 14 percent proficiency rate.

Table 1: SIMR Targets & Data for FFY 2013-2018

FFY	2013	2014	2015	2016	2017	2018
Targets	n/a	54.0%	24.0%	14.9%	15.15%	15.5%
Actual Rates in Tulsa County	37.8%	22.8%	22.8%	14.9%	10.5%	15.4%

Theory of Action Summary

As stated in the Phase II document, each selected improvement strategy was intended to increase the capacity of state and local personnel and parents to provide high quality literacy instruction at school and at home, timely services and individualized supports to students with disabilities.

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As described by the SSIP Part B Theory of Action (Appendix A), increasing core capacity would make personnel and families more likely to positively influence student outcomes, including third grade reading assessment scores. The six strategies addressed core areas of improvement for the state identified in Phase I of the SSIP: effective data sharing between Part C and Part B programs, meaningful district accountability for student educational results, topical targeted assistance, and practical training for both families and personnel. If the strategies were implemented with fidelity, we believed that specific intermediate outcomes would be realized, leading to improvements in the SIMR. Table 2 lists each strategy and the rationale for its impact on the SIMR.

Table 2: The SIMR Improvement Strategies

Core Areas	Improvement Strategies	Rationale for Impact on SIMR
Effective data sharing	Strategy 1 Develop data tracking mechanism for children exiting SoonerStart and entering an LEA	LEAs will be ready for students transitioning to their districts within their data system. Delays in document sharing will be eliminated. This means LEAs will be able to provide timely interventions for children at risk for reading failure as soon as they enter the school system. This will prevent students from falling behind in reading and enable them to maintain grade level reading benchmarks as measured by the 3 rd grade assessment.
Meaningful district accountability	Strategy 2 Implement new differentiated monitoring system to incorporate performance measures	Including academic performance measures in a differentiated monitoring system will ensure LEAs are focused on academic achievement as well as compliance with IDEA. LEAs will receive TA to improve the academic performance of students with disabilities as well as to maintain high levels of compliance.
Topical targeted assistance	Strategy 3 Improve parents' engagement in students' use of accommodations & AT for instruction and assessment Strategy 4 Improve educators' knowledge of accommodations & AT for instruction and assessment	Accommodations are provided to minimize the effects of a disability so that a student can have access to content and demonstrate that knowledge on assessments. AT devices provide additional support for a student within the construct (skills), context (environment, materials), and activities of instruction and assessment. If parents and teachers are well informed about accommodations and AT, students will receive the supports they need to access content and demonstrate their learning on assessments.
Practical training	Strategy 5 Provide access to early literacy resources for families with 3-5 year olds in the target area Strategy 6 Provide targeted professional development to LEA personnel in evidence-based practices in early literacy.	When parents engage in daily literacy activities such as reading aloud with their children, their children show significantly improved cognitive growth, enabling them to enter school ready to learn and preparing them for substantial literacy gains as they move from grade to grade. Teachers who are knowledgeable in evidence-based reading practices in early grades provide a solid foundation for student achievement in reading. This foundation will help students transition from learning to read to reading to learn as they advance.

Oklahoma made substantial improvements to increase effective data sharing, expand district accountability for student results, and enhance the state's and partners' capacity to provide targeted assistance and professional development on topics related to high quality IEPs and early literacy. Unfortunately, Oklahoma struggled to provide practical early literacy training to its core audiences in Tulsa County. Local districts simply were not interested in participating in these strategies as designed for the SSIP.

Year Four Accomplishments

In the final year of the plan, strategies were implemented with varying degrees of success. The following list highlights strategic achievements in year three.

- Strategy 1:** The mechanism for assigning unique identification numbers to Part C eligible children has been implemented and is working consistently the majority of the time.
- Strategy 2:** The differentiated monitoring system continues to be implemented successfully. The outcome measures and their weights were adjusted in year four, to better reflect districts' challenges, resulting in a much larger number of "needs assistance" and "needs intervention" LEAs than the prior year.
- Strategy 3:** The Oklahoma Parents Center continues to provide IEP training to families in Tulsa County through a variety of community organizations and partners. This training covers accommodations and assistive technology.
- Strategy 4:** Accommodations training for general and special educators was scaled-up via in-person and online training, with more than 100 participating districts across the state. The assistive technology training was entirely moved to an online format. Since April 2019, thirteen districts have had one or more personnel participate in training.
- Strategy 5:** The SPDG partnership held a parent outreach on early literacy in May 2019 in Sand Springs Public Schools, with more than 40 families participating.
- Strategy 6:** LETRS training and coaching were provided in Sand Springs Public Schools to early elementary teachers.

Stakeholder Involvement

Oklahoma's IDEA Part B State Advisory Panel (SAP) has served as the formal stakeholder group to which the SSIP leadership team reports on a quarterly basis. With other stakeholders in Tulsa County and elsewhere, the SAP advised the Phase I analysis and the Phase II design of the SSIP. The Panel consists of 50 representatives of various groups who have deep interest in the outcomes produced by the SSIP, including families, students, disability advocacy organizations, professional organizations, service providers, higher education, and districts. It includes representatives from the Tulsa area. Throughout the SSIP's timeframe, SAP stakeholders overwhelmingly preferred to primarily offer broad oversight for the ongoing implementation of the SSIP, delegating decision-making authority to the designated leadership team. This team consisted of state and local Part B personnel, members of the Oklahoma Parents Center and ABLE Tech, and personnel of the 2017 Oklahoma State Personnel Development Grant (OK SPDG III).

The implementation of each strategy was significantly informed by stakeholders specific to the targeted intervention. The leadership team worked diligently to identify important stakeholders for each strategy, seek out their perspectives, and direct implementation based in part on their recommendations. For most strategies, the key stakeholders are themselves participants in the activities, such as parents and district personnel. Other stakeholders included organizational partners

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such as ABLE Tech and the Oklahoma Parents Center. More details about strategic stakeholders are described in the separate summaries in the following pages.

All stakeholders have been regularly informed of relevant implementation updates and evaluation findings, including survey results. This report will be made available to stakeholders on the Part B state website, in the data section. Reports for the past three years are currently posted.

As the former SSIP concluded, the evaluation and leadership teams met with stakeholders to define the end of the SSIP and the adoption of a new plan. All details about the adoption of a new SSIP and SIMR are presented in Section Two of this report.

Evaluation Summary

The SSIP evaluation team, which consists of OSDE-SES data analysts and evaluators, program specialists, and program directors, worked in year four to ensure that data were collected to measure progress on implementation as defined in each strategy's evaluation plan. Data collected through the SPDG partnership continued to be limited (for strategies 5 and 6) because of changes in planning and personnel at the selected SPDG supported sites. Details about the strategic objectives and outcomes, findings and results are described in the following paragraphs for each strategy.

Implementation and evaluation timeframes

All strategy timeframes are generally aligned with the Oklahoma fiscal year, running from July to the following June. Planning for design and implementation of all improvement strategies began at the end of Phase II in April 2016. Implementation began for most strategies in fall 2016, the first year of Phase III (July 2016 to June 2017). Year four was technically half a year of implementation, falling between July 2019 and December 2019. However, each strategy has a different start date and its baseline evaluation data were collected at different points in year one. This has caused the evaluation timeframe to vary across strategies, especially when we needed to collect data annually (twelve months apart). Each strategy's evaluation timeframe is listed with the performance target data for that strategy.

Strategy 1: Develop data tracking mechanism for children exiting SoonerStart & entering an LEA

This infrastructure improvement was implemented to ensure that the records of children who transition from Oklahoma's Part C early intervention program, called SoonerStart, to an LEA are transferred on a timely basis with a unique state identifier (called a student testing number, or STN). This would enable LEAs to process referrals for special education eligibility consideration for this population quickly and efficiently. The process for assigning an STN to a SoonerStart eligible child is described in detail in the Phase III year one report.

The implementation of this strategy affected the SIMR indirectly, by increasing the likelihood that LEAs would be ready for students transitioning from SoonerStart. A given LEA would have immediate access to a child's service and intervention history as well as pertinent evaluation data, all within their own data system, reducing or eliminating delays in document sharing from SoonerStart to the LEA. Relevant personnel would know the services and interventions a child received from SoonerStart and would be able to provide appropriate interventions for children at risk for reading challenges as soon as they enter school. This would prevent students from falling behind in reading and enable them to maintain grade level reading benchmarks as measured by the 3rd grade assessment. The stakeholders for this strategy were LEAs, SoonerStart and OSDE-SES personnel, many of whom were on the SSIP leadership team.

Summary of progress: Phase III year four

Implementation of this strategy proceeded as planned during year four, and will continue indefinitely. Of the 3195 children determined eligible for services through SoonerStart between March 1, 2019 and February 29, 2020, 79.5 percent have been assigned a unique STN. This rate is slightly higher than last year, but is still below target (objective 1). The management team continues to review the processes to ensure that STNs are assigned timely, and that all manual steps are completed by the appropriate parties. Periodically, we still experience delays in the completion of the manual steps. We are looking into automating the process to reduce errors and delays.

Evaluation

No changes were made to the evaluation plan in year four. The strategic objectives and medium-term outcomes were:

Objective 1: Nearly every child will automatically be assigned an STN when determined eligible for SoonerStart services, starting March 2017

Objective 2: When an STN cannot be automatically assigned, personnel review potential conflicts on a timely basis, starting September 2017

Objective 3: LEA personnel activate transferred records on a timely basis, starting March 2017

Outcome 1: LEAs will maintain the STN provided to children who leave SoonerStart and enroll in the LEA

Outcome 2: The data mechanism process meets requirements for sustainability

Table 3 on page 8 lists each objective and outcome and the program's status in the final evaluation year (year four of implementation) on the related performance measures. Success on specific objectives and outcomes varied, and some targets were not met. However, the system is sustainable and will be continued. Several measures will continue to be used to monitor fidelity to implementation to ensure all children transition to Part B with a unique ID. These include monitoring whether STNs are assigned in a timely manner and whether districts are assigning new numbers to SoonerStart children who already have them.

Final strategy summary

Stakeholders and leadership have determined that this strategy was successfully implemented and met all timeline goals, although individual objectives were more or less achieved as desired. Proper implementation of this strategy relies on hundreds of personnel in SoonerStart and districts to correctly manage STNs for transitioning students. With little control over many of these individuals (such as administrative assistants and enrollment officers), we rely on special education directors to ensure that they are adequately training district personnel. Given these challenges, we are generally satisfied with how this strategy has been implemented.

Importantly, this strategy will continue to be implemented regardless of the SSIP ending, as it is now an established activity that benefits LEAs and SoonerStart. The process as it stands is sustainable, barring changes in vendors and contracts.

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Table 3: Strategy 1 Performance

	Performance Measures	Targets	Year Four Findings: Target Achievement
Objective 1	1. Percent of SoonerStart children assigned an STN at eligibility 2. Percent of SoonerStart children transitioned with STN	90% in year two*; 95% in year three and beyond	Did not meet target: 1. 79.5% assigned an STN ¹ Met target: 2. 96.7% transitioned with an STN ²
Objective 2	Percent of potential record conflicts reviewed within two weeks	95% in year two; 100% in year three and beyond	Approaching target: 92.0% reviewed timely ³
Objective 3	1. Percent SoonerStart records transferred electronically 2. If transferred, percent records transferred timely (prior to TPC) 3. Percent records transferred timely that are activated timely (prior to TPC)	90% in year two; 95% in year three and beyond	Target met: 1. 100.0% transferred electronically Targets not met: 2. 85.6% of records were transferred timely 3. 55.4% activated timely ⁴
Outcome 1	Of children transitioned with an STN, percent not assigned a new STN	95% in year two; 100% in year three and beyond	Approaching target: 97.0% not assigned a new STN
Outcome 2	The data system mechanism meets the following requirements for sustainability: ⁵ 1. leadership supports and advocates for the mechanism to stakeholders; 2. funding is secured for at least five years to maintain and improve the mechanism; 3. adequate processes are in place to identify and remedy system lapses; 4. documentation exists to transfer knowledge about the mechanism and all processes to new personnel.	Year two: elements 1, 2 and 3 are fully implemented Year three: Continued, with development of element 4 Year four: Continued, with element 4 fully implemented	Targets met: 1. leaders advocate strongly for the system and are involved in all decision-making 2. funding is secured ⁶ 3. processes are defined and implemented 4. documentation completed

*Year one had no implementation for this activity. Year two: 4/1/2017 to 3/30/2018; year three: 4/1/2018 to 3/30/2019; year four: 4/1/2019 to 12/31/2019.

¹ Data source: Child records in SoonerStart database.

² Data source: Child records in SoonerStart database. Review included students who “aged out” with consent to transition between 3/1/2019 and 12/31/2020.

³ Data source: Statewide “STN Wizard” tool for reconciling student records

⁴ Data source: Student records in Part B database; also for Outcome 1.

⁵ Recommended characteristics derived from the DaSy-ECTA Quality System Framework.

⁶ Data source: Project documentation, for all of outcome 2 elements

● **Strategy 2: Implement differentiated monitoring system to incorporate performance measures**

This infrastructure improvement was intended to ensure that districts are held accountable for compliance and performance indicators in the annual differentiated monitoring process. Oklahoma expected that with greater accountability for performance outcomes, districts will improve practice, leading to better student outcomes in academic performance. This improvement was believed to be critical to advancing the SIMR because districts would be held accountable for students' assessment performance in comparison to the state target in the annual district determination. This would provide an additional incentive to improve educational practices that advance student performance. Through this process, OSDE-SES provides specific differentiated supports to districts as they identify weaknesses in practice and work toward change.

Summary of progress: Phase III year four

The differentiated monitoring system matured substantially this past year. The activities completed in year three were strong additions to the system, and recent developments benefited from those additions. Most of the activities proposed in the last report were accomplished, with a few exceptions. In year four, OSDE-SES:

1. added and adjusted several measures included in the determination and the risk assessment (and their weights) to more accurately reflect LEAs' fiscal risk to the state, compliance status, and student achievement levels. Genuine needs were identified this year.
 - a. In doing so, a much larger number of LEAs were identified as needing support: 250 at level 2 support (akin to "needs assistance"), 52 at level 3 support (akin to "needs intervention"), and one at level 4 support ("needs substantial intervention").
 - b. All changes are documented in the updated GSS RBA and Monitoring Manual on the OSDE-SES Compliance website (<https://sde.ok.gov/compliance>) and in associated posted documents (such as the self-assessments).
2. modified the required activities to reflect that at level 3, a district may need more than a targeted monitoring.
3. revised the self-assessments to enable LEAs to identify areas of need and their root causes, while also providing more resources for improving outcomes.
4. updated online access through a grants management system to some reports and documentation, though not all.
5. identified methods to categorize model districts, while developing mechanisms through which they can be encouraged and acknowledged. This work is not yet complete.
6. improved the data retreat based on participant feedback, with new content and revised activities.
7. trained OSDE regional accreditation officers and shared LEA results with them to improve agency oversight and monitoring.
8. began to develop a broader monitoring approach for the whole agency, by sharing information about LEA status and needs, compliance and outcome findings, etc., and by participating in monitoring visits across other agency units.

The areas in which OSDE-SES struggled in year three are the same in year four: developing methods to encourage and acknowledge LEAs with high student outcomes, and establishing a broad agency approach to monitor and support LEAs. On the first effort, one of our challenges has been that recognizing stellar districts in one area can be problematic when they struggle with other

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components: giving an “award” to a district that has solid test scores when it is in the news next week for discipline issues is not good for the state. We continue to work to develop methods to incentivize high outcomes, such as providing public recognition through the school report card process. On the second effort, the challenge is that other offices in the agency typically work with school sites rather than LEAs. We are developing a system to track districts’ work with other offices in OSDE, so School Support knows when an LEA is being monitored by special education, for example. This will help immensely with communication and coordination, at the least.

OSDE-SES will continue to implement the activities, processes and procedures developed through this strategy for its differentiated monitoring process. It has been extremely beneficial for guiding the office in identifying LEAs that need support with improving student outcomes while still attending to compliance, and directing resources and assistance efficiently to those districts that need it the most.

Stakeholder involvement

As in past years, LEA representatives have provided excellent feedback throughout the differentiated monitoring process about what works well, what support they need, and how the state can improve activities and documentation. Last year, we reported that OSDE-SES would re-weight the ECOs in the results matrix on the determination to avoid over-identifying districts for missing data. This was accomplished. Along with this change, we incorporated a growth measure into the assessment scoring calculation in response to stakeholder feedback.

Evaluation

The strategic objectives and medium-term outcomes for this strategy have reflected the need for permanent functionality and sustainability of the differentiated monitoring process:

Objective 1: The initial differentiated monitoring model is launched by November 2017

Objective 2: The differentiated monitoring system design is high quality

Outcome 1: The differentiated monitoring system implementation is high quality

Outcome 2: The differentiated monitoring system is sustainable

Table 4 on page 11 summarizes the performance measures, annual targets and target achievement for each of the objectives and outcomes. As mentioned in the summary of progress, two elements of the strategic activities have not been fully implemented: the design and implementation of a system for identifying and incentivizing exemplary work (objective 2, measure 3 and outcome 1, measure 4), and the alignment of this differentiated monitoring system within a unified, agency-wide monitoring approach (outcome 2, measure 6). Overall, however, OSDE-SES has achieved its goal of incorporating results-based accountability into its monitoring processes and restructuring its approach from applying penalties to offering support.

Final strategy summary

Strategy two has also been implemented successfully and has met all timeline goals. Although the leadership team struggled to make significant changes in the first year, the team’s effort gained momentum and overhauled its monitoring system starting in year two. Stakeholder input has been critically important to defining all changes, and we expect to continue working with LEAs to refine the differentiated monitoring process over time. The process is sustainable at this time, though improvements are possible.

Table 4: Strategy 2 Performance

	Performance Measures	Targets	Year Four Findings: Target Achievement
Objective 1	The initial DM ⁷ model is launched by November 2017	Deadline was met	Deadline achieved
Objective 2	To demonstrate high quality, the DM system design is characterized by... ⁸ 1. high data quality 2. plans for: a. timely communication b. comprehensive LEA improvement c. district-led change 3. incentives for exemplary work 4. full documentation 5. active feedback loops to support continuous improvement 6. training plan for SEA personnel	Year two*: partial to full implementation of all elements Years three/four: full implementation of all elements	Targets met for each element except number 3: 1. data are pulled from valid, reliable, complete sources; ⁹ 2. plans are completed for: a. LEA communication, b. comprehensive improvement, and c. district-led improvement; 3. incentives for exemplary work are developed in part; 4. documentation is complete; 5. the SEA has mechanisms in place to acknowledge and respond to feedback; and 6. the training plan for SEA personnel is completed. ¹⁰
Outcome 1	The system implementation is high quality, characterized by... 1. efficient, timely, effective, clear and responsive implementation 2. accurate data reporting 3. timely, consistent communication 4. incentives for exemplary work 5. trained, capable SEA staff 6. full documentation 7. active feedback loops 8. data-informed improvement 9. district-led improvement	Year two: elements 1 to 3 fully implemented; elements 4 to 9 partially implemented Year three: growth and improvement in elements 1 to 3; elements 4 to 7 fully implemented; elements 8 to 9 partially implemented	Targets met for each element except 4: 1. implementation met goals; 2. data quality was very high and concerns were addressed immediately; 3. communication was timely; 4. some incentives were provided; 5. staff received training; 6. documentation is complete; 7. feedback loops are in place; 8. improvement is data-informed; and 9. improvement is district-led.

⁷ DM: differentiated monitoring

⁸ Recommended characteristics of a high quality GSS are derived from the "Ten Desired Elements of a General Supervision System for Improving Results," developed collaboratively by state and TA members of the Results-based Accountability Cross State Learning Collaborative between 2013 and 2017.

⁹ Data sources: Oklahoma State Aid and State Finance offices, EdPlan, and monitoring documentation

¹⁰ Data sources: program documentation. Also for outcomes 1 and 2.

Table 4: Strategy 2 Performance

		Year four: full implementation of all elements	
Outcome 2	<p>The DM system meets the following requirements for sustainability and continuous improvement:¹¹</p> <ol style="list-style-type: none"> 1. Leadership supports and advocates for the system to stakeholders; 2. Adequate processes are in place to include stakeholder input to identify enhancements to the system; 3. Documentation exists to transfer knowledge about the system to new personnel; 4. A comprehensive internal PD system is functional; 5. Ongoing assessment is used for continuous system improvement; 6. This system functions within a unified agency monitoring system for school support and improvement; and 7. The process and supporting components (personnel, TA) are sufficiently funded. 	<p>Year three: elements 1 to 4 are near full implementation; elements 5 to 7 are partially implemented</p> <p>Year four: all elements near full implementation</p>	<p>Targets met for each element except 6:</p> <ol style="list-style-type: none"> 1. leadership supports and advocates for the system; 2. stakeholder input is incorporated; 3. documentation is adequate; 4. internal PD framework has been developed; 5. ongoing assessment conducted and influential; 6. <i>framework is not incorporated into agency monitoring system, but discussions have occurred; and</i> 7. funding is sufficient and sustainable.

*Year one: 7/1/2016 to 6/30/2017; year two: 7/1/2017 to 6/30/2018; year three: 7/1/2018 to 6/30/2019; year four: 7/1/2019-12/31/2019.

¹¹ Recommended characteristics derived from the DaSy-ECTA Quality System Framework and the “Ten Desired Elements” document referenced previously.

Strategy 3: Improve parents' knowledge of accommodations & AT

This improvement strategy was implemented to increase parent knowledge and advocacy pertaining to accommodations and assistive technology (AT) in the classroom and during assessments.

Accommodations are provided to minimize the effects of a disability so that a student can have equal access to content and demonstrate his or her knowledge on assessments. AT devices provide additional support for a student within the construct (skills), context (environment, materials), and activities of instruction and assessment. If parents are well informed about accommodations and AT—and advocate for them more often—students would receive the supports they need to access content and demonstrate their learning on all assessments, including the third grade reading assessment, thereby affecting the SIMR.

Summary of progress: Phase III year four

This strategy continued to be implemented through a partnership with the Oklahoma Parents Center (OPC). The OPC conducted three training sessions between April and December 2019, with twenty families participating. They did not scale up the training this year to locations outside Tulsa County, although they are currently exploring that possibility this year.

OPC reviewed the training content this year, abbreviating portions to make it more accessible and efficient for families, and incorporating missing information about accommodations. The adjustments made to content regarding accommodations resulted in demonstrable knowledge gains for participants as compared to previous years (objectives 3 & 4). As mentioned in the last SSIP report, parents commented regularly that the training was too long and would require too much time on their part. This was the primary reason given for not participating, even though the content looked beneficial. As a result, OPC shortened portions of the training to address these concerns. The training team continues to consider alternate methods of delivering the content, including online components. Parent and partner stakeholders continue to be an excellent source of feedback about the training itself.

Evaluation

No changes were made in year four to the evaluation plan for this strategy. The objectives and medium-term outcomes are:

Objective 1: All participating parents/caregivers receive written guidance on the benefits and use of accommodations and AT

Objective 2: Parents are instructed on navigating the ABLE Tech website, including features highlighting the selection of AT by function and purpose

Objective 3: Parents are aware of and knowledgeable about available options for AT and accommodations for both assessment and daily instruction

Objective 4: Parents comprehend the variation across accommodations' function and selection, particularly for assessments (Note that the measurement of objective 4 is integrated into the accommodations measure for objective 3.)

Outcome 1: More parents advocate for their students' needs for AT and/or accommodations

Table 5 on page 14 summarizes the performance measures for all objectives and outcomes and the program's status relative to the performance targets. Objectives 3 and 4 were measured through pre and post questionnaires that assessed participants' knowledge gained during the training. The evaluation team was able to match 21 of the pre and post responses. Despite the small response set, paired means comparisons resulted in significant growth in knowledge of accommodations and AT, as well as comfort with advocacy. This is the first year in which the training has produced demonstrable

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gains in accommodations knowledge also, likely a result of OPC's incorporation of additional accommodations content. Once again, outcome 1 was not measured in year four because of the changes to content and structure of the new training.

Final strategy summary

This strategy has worked to increase parent knowledge about AT and accommodations, and has been shown in the past to increase advocacy and the practical application of AT and accommodations by parents. The challenge with this strategy was reaching a large enough number of parents to affect the SIMR. At the small scale, this training causes change, but it likely has not had an effect at the county level. OPC will continue to incorporate AT and accommodations information in its IEP parent training curriculum, but this strategy is not sustainable at a large scale for improving early literacy.

OPC will continue the IEP training around the state by local request, covering all aspects of high quality IEP implementation (including AT and accommodations), while streamlining the format and content to meet parents' need for a training that can be completed as conveniently as possible.

Table 5: Strategy 3 Performance

	Performance Measures	Targets	Year Four Findings: Target Achievement
Objective 1	Participating caregivers are provided written materials to support training objectives and content	100% of caregivers	Target met: 100% of training participants received written support materials ¹²
Objective 2	Training includes demonstration and instruction on accessing AT content on the ABLE Tech website	100% observance	Target met: 100% of training sessions included website instructions & demonstration ¹³
Objectives 3 & 4	1. Participants demonstrate growth in AT knowledge 2. Participants demonstrate growth in accommodations knowledge 3. Participants demonstrate growth in comfort with advocating for child's needs	Statistically significant ¹⁴ difference in knowledge and comfort levels	Targets met: ¹⁵ 1. Difference in AT knowledge (pre to post) is significant with a mean increase of 17% 2. Difference in knowledge of accommodations (pre to post) is significant with a mean increase of 45% 3. Difference in comfort with advocating is significant with a mean increase of 16%
Outcome 1	Participating families report increased advocacy efforts	50% respondents report advocacy activity	N/A

¹² Data source: training documentation

¹³ Data source: training documentation

¹⁴ As indicated by a p-value of less than 0.05 in tests of association.

¹⁵ Data sources: pre and post event surveys for parents of children with disabilities. N=21.

● **Strategy 4: Improve educators' knowledge of accommodations & AT for instruction & assessment**

This improvement strategy mirrored strategy three, with a different target population. The two were developed to take a two-pronged approach to improving student supports in the classroom and on assessments by increasing parents' and personnel's knowledge about assistive technology and accommodations. If teachers and parents were both well informed about accommodations and AT, students would receive the supports they need to access content and demonstrate their learning on assessments. New educators in particular need this information.

Summary of progress: Phase III year four

This past year, the activities for the two strategic topics of AT and accommodations have focused on developing and distributing all content through online formats. Tulsa County has not been targeted specifically in year four for interventions.

Assistive Technology

Through the partnership with ABLE Tech, all AT content was moved online into several small courses in our online training platform. These courses cover all content included in the original training series. Since April 2019, thirteen districts have had one or more educators complete at least one of the six AT courses. One of these districts was in Tulsa County. ABLE Tech has also provided its in-person training series in several locations across the state to develop district AT teams.

Accommodations

One course on accommodations has been added to the online training platform. More than 102 districts have had at least one educator complete the course since April 2019, with 650 completions. Ten of these districts were in Tulsa County. Program specialists are considering whether a second advanced course is needed to meet demand. This course has been well-received by districts.

Evaluation

OSDE-SES' vision for strategy four was that school educators understand the need for and use of AT and accommodations in assessment and daily instruction and incorporate them more appropriately into IEPs. The objectives and outcomes for this strategy were:

- Objective 1: All participating personnel receive written guidance on the benefits and use of accommodations and AT at in-person training events
 - Objective 2: Personnel are instructed on navigating the ABLE Tech website, including features highlighting the selection of AT by function and purpose
 - Objective 3: Personnel are aware of and knowledgeable about available options for AT and accommodations for both assessment and daily instruction
 - Objective 4: Personnel comprehend the variation across accommodations' function and selection, particularly for assessments (Note that the measurement of objective 4 is integrated into the accommodations measure for objective 3.)
- Outcome 1: Variation in allowed accommodations will increase and the overall quality of IEPs will improve with regard to accommodations
 - Outcome 2: AT consideration and use among school-age students increase, as documented in IEPs

These objectives and outcomes were not evaluated in year four because the implementation plan did not include targeted interventions in Tulsa County. After years one and two were successfully implemented in Tulsa County, the leadership team moved to scale-up these activities through in-person and online training opportunities across the state. No data were collected in Tulsa County, the

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exclusive location of evaluation. See the year two narrative report for the findings on objectives 1 through 4 and outcome 1, and the year three report for the outcome 2 results. The performance measures and targets for each of these are provided in Table 6.

Final strategy summary

This strategy was implemented as planned, and the long-term strategic goals were achieved with the full transfer of content to our online training platform. These courses will be maintained, expanded and improved as warranted over time. Additionally, when implemented and evaluated in Tulsa, all objectives were met and outcomes appear to have been met (as described in previous reports, measurement was more difficult than anticipated). In these ways, the strategy was implemented successfully and will be sustained.

Table 6: Strategy 4 Performance

	Performance Measures	Targets	Year Four Findings: Target Achievement
Objective 1	Participating educators are provided written materials to support training objectives and content	100% of participants	N/A
Objective 2	Training includes demonstration and instruction on accessing AT content on the ABLE Tech website	100% observance	N/A
Objectives 3 & 4	1. Participants demonstrate growth in AT basic and practical knowledge 2. Participants demonstrate growth in accommodations knowledge	Statistically significant ¹⁶ difference in knowledge levels	N/A
Outcome 1	1. Selected accommodations meet the individualized needs of students 2. Teachers show improvement in the selection of accommodations	1. 95% of IEPs after training 2. 50% of teachers show improvement	N/A
Outcome 2	1. AT consideration is documented accurately and completely 2. AT is adopted as a tool more often in IEPs	1. 100% 2. 25% change, and is statistically significant	N/A

¹⁶ As indicated by a p-value of less than 0.05 in tests of association.

● **Strategy 5: Increase access to early literacy resources for families**

This improvement strategy was incorporated into the SSIP to increase early literacy knowledge of parents with preschoolers, bridging a gap in effort between SoonerStart and school-age initiatives to improve early literacy (EL). The goal has been to promote family access to EL resources in Tulsa County and directly provide information to families about evidence-based practices for improving EL growth in the home. The justification for this strategy was that young children's literacy will improve as parents engage in more EL practices in the home, leading to growth in the SIMR over time. When parents engage in daily literacy activities such as reading aloud with their children, their children may show significantly improved cognitive growth, preparing them for substantial literacy gains as they move from grade to grade.

Summary of progress: Phase III year four

To implement this strategy in years three and four, plans were made to work more extensively with the State Personnel Development Grant team, which was awarded a new grant in 2017 (OK SPDG III). The goals and activities in the OK SPDG III included supporting the Oklahoma Part B SSIP.

Strategy five was implemented solely in the Sand Springs Public Schools district, one of 22 LEAs in Tulsa County, because it was the only SPDG partner district in Tulsa County.

Two activities were planned for implementation during year four. As described in the year three narrative report, a parent outreach event was held in May 2019 at the Sand Springs Early Childhood Center (where all public preschoolers in the district are enrolled). Personnel from OSDE and the SPDG team participated in the event, sharing a brief presentation and related materials on early literacy best practices with parents who attended. More than 40 families participated, and 35 responded to the evaluation survey. Of those who responded, half reported early literacy knowledge gains. The overall average knowledge gain due to the training was 13.4 percent, which was statistically significant for the group as a whole.

Unfortunately, the second event was never held. The Sand Springs Early Childhood Center was not able to hold its orientation night as planned in the fall of 2019, and was not able to schedule a second evening where early literacy could be presented. As mentioned in previous reports, the difficulty of scheduling events with districts to share information with parents has been the biggest challenge for this strategy. Even with interested districts, such as Sand Springs, district needs take priority over other desired activities.

Stakeholder Input

In year four, the primary stakeholders of interest was the OK SPDG III team and Sand Springs Public Schools' personnel, who coordinated the event. Personnel at the EC Center were instrumental in helping to organize and design the parent outreach night.

Evaluation

The objectives and medium-term outcomes for this strategy were:

- Objective 1: Parents receive written guidance on early literacy best practices and resources
- Objective 2: Parents understand the foundational concepts of early literacy
- Objective 3: Parents understand importance of early literacy best practices
- Objective 4: Parents access shared resources in Tulsa County
- Outcome 1: Parents engage in more early literacy best practices in the home

Table 7 summarizes the performance measures for all objectives and outcomes. Only objectives 1 and 2 could be measured in year four because parents did not respond to a follow-up survey requesting information about behavioral changes over time.

Table 7: Strategy 5 Performance

	Performance Measures	Targets	Year Four Findings: Target Achievement
Objective 1	Participating parents are provided written materials on best practices and local resources	100% of parents trained	Met target
Objective 2	Participants demonstrate growth in early literacy foundational knowledge	Statistically significant ¹⁷ increase in knowledge	Target met: Mean knowledge increase of 13.4% ($p < 0.000$)
Objective 3	Participants report will increase best practices in the home	25% respondents report will increase best practices	N/A
Objective 4	Participants access local resources/the library more frequently	25% respondents report more frequent access	N/A
Outcome 1	Participants report more frequent reading activity	25% respondents report increased practice	N/A

Final strategy summary

Oklahoma has struggled annually to engage parents in partnership with districts to provide early literacy (EL) training on evidence-based practices. When this strategy was designed, stakeholders believed that affecting EL outcomes for three to five year olds required working with their parents and increasing parent knowledge about best practices, since only a portion of this age group is in a public or private educational program. The only way to reach these parents well was to work with local districts and community partners who knew their communities.

When districts were willing to reach out to parents and community partners, implementation went fairly well. In each of the three events that were held over the years, parents who attended reported knowledge growth and the potential for changed behavior. Unfortunately, three events across three years is not successful implementation of an evidence-based strategy.

From the beginning, the strategic leadership team had a difficult time finding willing partners to assist with implementation. Ideally, the local partners would have taken the lead while OSDE would have managed the evaluation. This did not happen. With one exception, districts were surprisingly unwilling to manage events, develop content, produce materials, etc., so the state team had to take responsibility for implementing events and activities in a county more than 100 miles away. This never worked well, despite best efforts. Even when the SPDG team took over responsibility for implementing this strategy, their overarching goals did not precisely align with this implementation, causing it to receive less attention when the team had its own personnel limitations.

The inability to implement this strategy to its fullest effect is one of the primary reasons that this SSIP has not succeeded as planned, and why stakeholders were ready to begin designing a new plan this year.

¹⁷ As indicated by a p-value of less than 0.05 in tests of association.

● **Strategy 6: Improve educators' early literacy knowledge and practice**

This improvement strategy was intended to transform instructional practices to enhance the early literacy skills of young children in schools. If implemented widely, this strategic improvement would have directly affected student proficiency on reading assessments, including the state third grade reading assessment. Because participating educators teach all students in a district—not just students with disabilities—the entire district could have benefited in the long-term.

Oklahoma has offered a rigorous, evidence-based professional development to schools' reading instructors and specialists for several years through a contractor with the support of the OSDE Office of Instruction and the current State Professional Development Grant (OK SPDG III). LETRS (Language Essentials for Teachers of Reading and Spelling) builds educator effectiveness through professional development, emphasizing current research and EBPs in reading, writing and spelling. LETRS was the central component of this strategy, and efforts were made to implement LETRS throughout Tulsa County districts.

Summary of progress: Phase III year four

As with strategy five, plans were made to implement the strategy through collaboration with the 2017 OK SPDG III. In year four, the OK SPDG III team continued working with Sand Springs Public Schools as the SPDG and SSIP implementation site in Tulsa County. The SPDG team continued to have personnel challenges in year four; its primary literacy coach left the project, and several months passed before a new one was hired. This caused a delay in the coaching efforts, though a second coach was able to continue working with her subset of teachers through the fall. The primary coach's teachers did not receive as much coaching as originally planned. The primary coach's departure again left a gap in data collection, monitoring and reporting. This is an area of substantial need in the team's structure, and is being addressed by improving processes and procedures.

Stakeholder Input

In year four, the primary stakeholder of interest was the OK SPDG III team because it was charged with this strategy's implementation. Sand Springs Public Schools' personnel were also consulted regularly about the implementation of this strategy.

Evaluation

The long-term goal was that instructors who participate in the professional development will permanently change their instructional practices to incorporate evidence-based practices related to early literacy (EL). The strategic objectives and medium-term outcomes were:

Objective 1: At least one district will commit to completing the training and will complete it by spring 2019

Objective 2: Participants understand the foundations of reading and EL

Objective 3: Participants feel competent to select instructional strategies and other evidence-based practices for improving early literacy

Objective 4: Participants have consistent, high quality coaching support

Outcome 1: Participants positively adjust practice in response to coaching feedback

Outcome 2: Teachers implement appropriate instructional strategies and other evidence-based practices in their classrooms

Table 8 lists the performance measures for all objectives and outcomes and the associated targets. Because of the limited implementation of this strategy in year four due to personnel issues, the evaluation could not be conducted.

Table 8: Strategy 6 Performance

	Performance Measures	Targets	Year Four Findings: Target Achievement
Objective 1	At least one district will complete training by Spring 2019	One district completed	Training completed in March 2019
Objective 2	Participants demonstrate growth in early literacy foundational knowledge	Statistically significant increase in knowledge	N/A ¹⁸
Objective 3	Participants report competency for identifying best practices in instruction	Statistically significant increase in perceived competency	N/A
Objective 4	Each participant has an assigned coach	All participants have a coach	Target not met ¹⁹
Outcome 1	Participants report the coaching process has improved their practice	85% participants report positive evaluations	N/A
Outcome 2	Based on a matrix measure, coaches observe teachers' improved implementation of best practices	85% participants receive positive evaluations	N/A

Final strategy summary

When the SSIP was designed, this strategy was adopted because LETRS was an extremely popular evidence-based professional development framework among Oklahoma districts. Districts across the state clamored to receive the training, and still do. Unfortunately, Tulsa County districts were not among them. From year one, the strategic leadership team has struggled to persuade Tulsa area districts to engage with LETRS, despite it being offered at no expense.

Over time, it has become very clear that this strategy could not be successfully implemented in Tulsa County. Because the county was selected as the SIMR target area, the lack of district interest ensured that this strategy would not affect the SIMR. As with strategy five, the inability to implement this strategy to its fullest effect is one of the primary reasons that stakeholders were ready to begin designing a new plan this year.

¹⁸ Data sources: pre and post training surveys, also for objective 3.

¹⁹ Data sources: training documentation, participant surveys and coaching reports. Also for outcomes 1 and 2.

Lessons Learned: SSIP One

Over the course of the past few years of implementation of this SSIP, Oklahoma has learned many lessons to inform the planning and implementation of subsequent plans. All of these lessons will shape the next SSIP structure and design, particularly those relating to how to identify and work with district partners. The following are the fundamentals:

1. When selecting LEAs for intervention, it is essential that the state determine whether partners will be voluntarily involved or mandated. If the former, partner districts must be engaged and have some ownership over the project's implementation and outcomes prior to being selected. Asking for volunteers after a project has started may result in zero partners.
2. Projects must provide strong incentives to districts to participate, especially when the project could fundamentally restructure how they work to meet students' needs on a daily basis. This is true for both voluntary and mandated partners, who may feel even less inclined to make genuine, sustainable changes willingly.
3. "Doable" evaluations must be realistic and feasible, while being as ideal as possible. Sometimes tradeoffs must be made to get "good enough" data for evaluation in ways that do not burden participants to a degree that the project is undermined.
4. Monitoring implementation requires a lot of resources and oversight, and early investments in human capital may make the difference between success and failure.

Section Two: The New Plan

At the end of Phase III year three of the former plan, the SSIP leadership team and stakeholders determined that the SSIP in its current form should be concluded. Three reasons drove this decision: first, the plan met its goals on the original timeline for strategies one through four, and these will be sustainably implemented for the foreseeable future. Second, the plan was not on track to succeed with strategies five and six even if the plan were extended a year. Finally, partly because of changes in state assessments during the course of the SSIP, the impact of the plan on the SIMR has not been clearly measurable. Though certain goals have been achieved, we have not been able to clearly determine whether the strategies as implemented have had an impact on students' third grade reading scores, undermining the overarching purpose of the former SSIP.

With these factors in mind, stakeholders believed the best tack for the state to take would be to conclude the SSIP at the end of 2019, then devise a new plan that would address the current needs of the state and districts and promote realistic evidence-based practices for all. After discussions with OSEP and approval to move forward, efforts began to design a SSIP whose implementation would begin in late 2020. The first step, planned to coincide with the submission of the April 2020 SSIP report, was the selection of a new SIMR focus area. The Office of Special Education Services (OSDE-SES) planned the following timeline:

- Begin Phase I in December 2019
 - Hold stakeholder meetings through February 2020
 - Report tentative State-identified Measurable Result (SIMR) in April 2020
- Complete Phase II by fall 2020
 - Begin to define implementation strategies in June or July 2020
- Commence Phase III in fall 2020

Phase I Stakeholder Engagement

Eight three-hour stakeholder meetings were scheduled in locations across Oklahoma in late January and early February, accompanied by an online meeting to support the participation of individuals who could not attend in person. Two meetings were held specifically for State Department of Education personnel. Five of the eight meetings were held, with three regional meetings cancelled due to a lack of stakeholder participation. District personnel, community advocates, agency partners, and family members were invited to all meetings, with notices shared through partners' and the state's social media accounts and a listserv maintained by OSDE-SES. Across all meetings, a wide variety of stakeholders gave feedback about a new SIMR.²⁰

A broad data and infrastructure analysis was conducted prior to the stakeholder meetings and the compiled information was shared and discussed with participants. The presentations included the following topics:

- SSIP overview and purpose of meeting
- The "tree of influence" blueprint, linking the APR indicators together by purpose and influence²¹
- Data analysis I: General information about special education in Oklahoma and comparisons to general education

²⁰ In summer 2020, more stakeholder meetings will be held to determine the root causes and the improvement strategies.

²¹ "Part B Tree of Influence", produced in May 2014 by the Regional Resource Center Program/Western Office and the National Post-school Outcomes Center, at https://transitionta.org/system/files/resourcetrees/Tree_of_Influence.pdf.

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- Data analysis II: Outcomes and state performance with national comparisons
 - Post-secondary
 - Secondary
 - Disciplinary removals
 - Assessments
 - Early childhood
- Infrastructure analysis I: General supervision system for special education
- Infrastructure analysis II: External context and structure governing special education in Oklahoma
 - ESSA & IDEA
 - Internal agency activities and collaboration
 - District activities and efforts
 - National partnerships and efforts

The discussions ended with a SCOR assessment (strengths-challenges-opportunities-risks) of the special education data and infrastructure in Oklahoma. Participants then concluded with small group discussions and submission of their recommendation for a new SIMR. More details about participants are provided in Appendix B (the Appendix provides all information requested in the original Phase I reporting request for B-17 that is not shared in this section of the report).

SIMR Summary: Need, Alignment, Resources, Capacity & Readiness

Data for each outcome over the past several years were presented to stakeholders. We compared APR results to national trends, and found that Oklahoma is achieving on par with other states in most areas. In nearly all outcome indicators except assessment proficiency, Oklahoma closely approaches, matches or exceeds the national averages. Table 9 shows portions of the outcome data shared, with national comparisons.

Table 9: Outcomes Data in Comparison

Outcome	FY 2018 State SPED Results	FY 2017 National SPED Averages
14A: Higher education participation	26.4%	26.4%
14B: Higher education & Competitive employment	57.2%	62.7%
14C: All engagement	73.4%	77.2%
1: Graduation	76.4%	66.6%
2: Dropout	14.5%	16.1%
4: Discipline (reported here as rate of Out of School Suspensions)	Black: 17.9% All others: 6.0%	Black: 20%*** All others: 8.4%
3B: Math/Reading Participation	98.6%/98.5%	94.4%/94.8%
3C: Math/Reading Proficiency	13.5%/12.5%	17.3%/18.1%
7 A1 & A2: Social Emotional Growth/Peer	93.4%/59%	81%/58%
7 B1 & B2: Knowledge & Skills Growth/Peer	92.9%/58.3%	81%/52%
7 C1 & C2: Behavior to meet needs Growth/Peer	93%/73%	81%/65%

***2013-2014 CRDC

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A single outcome area does not stand out as a great area of need for the state when compared to national trends, leading stakeholders to rely on other factors to select the next SIMR. After reviewing all of the data and infrastructure efforts, stakeholders felt compelled to choose a student-level outcome focus that a) undergirds student achievement in other outcome areas, and b) has been relatively neglected at the state level compared with other outcomes, and c) aligns with recent related efforts to address student behavior and trauma. State leadership concurs with all three of these reasons for the selection of the SIMR area.

With these reasons in mind, the recommended area of improvement was disciplinary removals, with a possible focus on racial disparities in rates of removals; more than 60 percent of stakeholders voted for this priority area, overwhelming every other outcome option. Each other outcome received at least one individual recommendation for the new SIMR, while assessment proficiency received support from 25 percent of participants. When this information and recommendation were shared with the full IDEA-B State Advisory Panel, 87 percent agreed that disciplinary removals should be the next SIMR target.

Need and Alignment

The most common reason cited for selecting disciplinary removals as the preferred SIMR focus is that it is a foundational issue that affects all other outcomes. By addressing the high rates of disciplinary removals, all other outcomes for students should improve. We see this in our data, as well. After analyzing state special education student-level data, the SPED data team found that disciplinary removals have a significant effect on students' long-term outcomes in three areas: assessment proficiency, drop-out, and graduation. (See Appendix B for additional details on the association analyses between disciplinary removals and related outcomes.) Rather than arbitrarily selecting one of these outcomes for the SIMR—when all are impacted by discipline—Oklahoma stakeholders believe that disparate removal rates should be the focus, ultimately benefiting all other outcomes.

There is considerable supporting evidence outside Oklahoma that disciplinary removals affect student achievement and proficiency, as well as other long-term student outcomes. Lacoë and Steinberg (2019) found that suspensions for even less serious classroom disorder incidents have a negative impact on assessment scores and proficiency, and the effect of missed schools days for suspension is greater than that for general absences.²² Others have also found significant negative associations between in-school and out-of-school suspensions ("exclusionary discipline") and:

- * Grade retention,
- * Dropping out (and subsequent negative social and economic costs),
- * Graduation,
- * Post-secondary enrollment and completion, and
- * Adult criminal victimization and involvement, and incarceration.²³

²² Lacoë, J., & Steinberg, M.P. (2019). Do suspensions affect student outcomes? *Education Evaluation and Policy Analysis*, 41(1), 34–62.

²³ Balfanz, R., Byrnes, V., & Fox, J.H. (2015). Sent home and put off track: The antecedents, disproportionalities, and consequences of being suspended in the 9th grade. In D. Losen (Ed.), *Closing the school discipline gap: Equitable remedies for excessive exclusion* (pp. 17–30). New York City: Teachers College Press.; Marchbanks, M. P., III, Blake, J. J., Booth, E. A., Carmichael, D., Seibert, A.L., & Fabelo, T. (2014). The economic effects of exclusionary discipline on grade retention and high school dropout. In D. Losen (Ed.). *Closing the school discipline gap: Equitable remedies for excessive exclusion* (pp. 59–74). New York City: Teachers College Press.; Noltmeyer, A.L., Ward, R.M., & McLoughlin, C. (2015). Relationship between school suspension and student outcomes: A meta-analysis. *School Psychology Review*, 44, 224–240.; Rumberger, R.W., & Losen, D.J. (2016). *The high cost of harsh discipline and its disparate impact*. Civil Rights Project/Proyecto Derechos Civiles. Available at https://www.civilrightsproject.ucla.edu/resources/projects/center-for-civil-rightsremedies/school-to-prison-folder/federal-reports/the-high-cost-of-harsh-discipline-and-its-disparateimpact/UCLA_HighCost_6-2_948.pdf; Wolf, K.C., & Kupchik, A. (2017). School suspensions and adverse experiences in adulthood. *Justice Quarterly*, 407–430.

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Though an “intermediate” student-level outcome compared with others, the fact that success in this area drives achievement in others, led stakeholders to select it for improvement. Over time, OSDE-SES will be able to monitor improvements in multiple areas to directly assess the link between reduced suspensions and other outcomes. Moreover, we anticipate that outcomes should improve for all students:

“If we focus on our structures for data reporting, restorative justice, culturally responsive discipline, [etc.,] GEN ED has to adjust as much as SPED.”—Stakeholder

Stakeholders provided several other reasons for selecting disciplinary removals as the SIMR. One of the most common was that other outcomes are already receiving a lot of attention at the state level. For example, graduation and post-secondary outcomes, assessment proficiency and early childhood readiness are strategic goals targeted by several initiatives outlined in Oklahoma’s ESSA eight-year strategic plan.²⁴ Multiple offices in OSDE are working toward improvement for all students in these outcome areas, and stakeholders felt that any additional work by Special Education Services would make only marginal gains. Stakeholders felt that discipline might ‘fall through the gaps’ if not addressed through the SSIP. In fact, the reality that this outcome area is not aligned with the majority of other efforts encouraged stakeholders to select it.

Even so, it does align well with recent efforts to address student behavioral needs and to promote trauma-informed education. Several discussions and professional summits have been held throughout the state in the past year, for general and special education populations. OSDE-SES is working to address behavior concerns in special and general education, while the agency is starting work with the SWIFT Education Center (Isi.ku.edu/centers/swift) to enhance the use of tiered interventions to support behavior and social-emotional wellbeing along side academics. We are just at the beginning of these efforts, however, and a related SIMR would help drive change and promote action. One member of the SAP wrote in support of this SIMR:

“Disproportional suspension rates is a huge problem not only in our state but as a nation. I do not feel that students are getting the right supports and that it is “easier” to send them out instead of teaching them other ways to deal with issues. With being a trauma responsive state we need to start putting what is best for kids in the forefront of our teaching rather than being so testing driven.”

Disparate discipline rates across racial groups (particularly suspensions) has been a public concern in several LEAs in Oklahoma in recent years, and the data statewide do not appear to be improving for either general education or special education students. Oklahoma districts particularly struggle with a very high rate of out-of-school suspensions among African-American students in comparison with students of all other racial identities. Last year, Black or African-American students with disabilities were three times as likely to be suspended out of school as all other students (18 percent to 6 percent). Unfortunately, this is not an anomalous finding when compared nationally. In most states and the country at large, districts typically suspend Black students with or without disabilities at least three times as often as White students.²⁵

Resources, Capacity and Readiness

Oklahoma has the financial resources to devote to a plan that addresses disciplinary removals and related school issues such as behavior and trauma. The state has already committed to building

²⁴ <https://indd.adobe.com/view/278915bb-1f2b-46c7-a354-22e2a02681a8>, pages 26-29.

²⁵ U.S. Commission on Civil Rights. (2019). *Beyond suspensions: Examining school discipline policies and connections to the school-to-prison pipeline for students of color with disabilities*. Available at <https://www.usccr.gov/pubs/2019/07-23-Beyond-Suspensions.pdf>; Gopalan, M., & Nelson, A.A. (2019). Understanding the racial discipline gap in schools. *AERA Open*, 5(2), 1–26.

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capacity and activity in these areas of concern, but we are only at the early stages of development. Focusing on these areas through the SSIP would help to ensure that they get the attention they need at the state and local levels.

Oklahoma has substantial organizational capacity to support the adoption and scaling-up of a variety of improvement strategies that could be implemented as part of the SSIP that targets high rates of discipline. We have technical expertise to address data collection deficiencies, partners' support and capacity to enable local change to address behavior and trauma, and local experience in the implementation of evidence-based practices in related areas. OSDE-SES has behavioral specialists among its staff, and meaningful partnerships with others around the state who are committed to work in this area. Additionally, the OK SPDG III team has MTSS specialists and partnerships with many districts across the state.

Communities, schools and districts are recognizing that student behavior and trauma cannot be solely addressed through increasingly severe disciplinary actions, and they are curious about learning about and implementing evidence-based practices that will help their students and schools succeed. Many local efforts are proving efficacious at helping districts manage behavioral concerns in ways that do not focus on the use of exclusionary discipline. Positive behavioral interventions and supports (PBIS) is one tool that has been used successfully in many schools, though is inconsistently implemented in others. All stakeholders feel a sense of urgency, that perhaps many have waited too long hoping that the issues driving increasing suspensions would "just go away." Districts have clamored to participate in recent efforts to address growing behavioral needs (such as trauma-informed education work), for example.

OSDE-SES has also made excellent use of technical assistance providers at the national, regional and local levels on the former SSIP and other projects, and would do so again with the new plan. Technical assistance related to PBIS, behavior-based MTSS (multi-tiered systems of support), and trauma-informed education would be especially valued for building state and local capacity.

SIMR: Measurement

To this point in the revision of the SSIP, a precise SIMR has not yet been officially selected. OSDE-SES anticipates that the overall disciplinary removal rate for students with disabilities on IEPs (the baseline for which is 21.6 percent) could be used if a race-specific measure is not preferred. For instance, a race-aligned gap or comparison measure could be used to target the vast disparity in suspension rates between Black and African-American students and all others. Whatever measure we select will be defined during the next set of discussions with stakeholders to identify the root causes and define the improvement strategies. The SIMR will be a child-specific/child-level measure.

Because of the SSIP reporting requirements, however, we are tentatively proposing to use the current rate of total removals for students with disabilities. Despite suspected underreporting, the state removal rate is 21.6 percent, and reflects data from the 2018-19 school year for all students, 3 to 21 years old. Targets are also tentative, and have not been reviewed yet by stakeholders. See Table 10 for all proposed targets.

Table 10: Possible SIMR Baseline Data & Targets

Baseline ratio: 21.6%	FFY 2019	FFY 2020	FFY 2021	FFY 2022	FFY 2023	FFY 2024
Targets	21.6	21.0	20.5	20.0	19.0	18.0

Appendix A: Oklahoma Theory of Action, FFY 2013 SSIP

2018 OKLAHOMA PART B THEORY OF ACTION

If the SEA...

- Implements aligned data systems between the Part C EIS program & Part B programs,
- Builds a new model to refine the entire general supervision system to incorporate RBA elements and a district risk analysis,
- Builds parents' capacity to advocate for best practices in IEPs for special factors, and
- Improves IEP teams' knowledge of special factors for IEPs,

Effective Data Sharing

Then...

- LEA personnel will align needs, goals and services of children who received EIS,
- LEAs will improve performance in response to results-based monitoring, interventions, and guidance,
- Parents will advocate for appropriate accommodations & AT for their students, and
- Educators will be empowered to appropriately select, use & evaluate accommodations & AT for all students,

District Accountability

If these outcomes are achieved...

- By FFY 2018, Oklahoma will see improved early literacy performance in specific districts in Tulsa County among students with disabilities taking the 3rd grade annual reading assessment.

- The passing rate (proficiency or above) in Tulsa County will increase from 20 percent in FFY 2014 to at least 30 percent in FFY 2018. Participating districts will also realize statistically significant improvement in the rate of growth toward proficiency among these students.

- Increases access to early literacy resources for families with young children, and
- Provides targeted PD to LEAs in EBPs in early literacy,

Topical Targeted Assistance

- Parents will work with children to excel at early literacy skills, and
- Educators will implement appropriate literacy instructional strategies for all students.

Practical Training

Appendix B: New SSIP Documentation for Phase I

This appendix reports information required in the Measurement Table for the Phase I components for the SSIP. However, because Oklahoma will not complete Phase I until summer 2020, some components are not reported here. Specifically, Oklahoma has not a) completed the root cause analysis of the factors contributing to low performance, b) selected the coherent improvement strategies, or c) developed a theory of action. Both Phase I and Phase II will be finished in summer 2020.

Description of stakeholder input

A variety stakeholders participated in discussions about the new SSIP and the SIMR, the process for which was described in Section One of the main report. Data and infrastructure were discussed in each meeting, so the stakeholder participation was the same for both components.

Many LEAs participated in discussions, representing small to large LEAs, and rural to urban. Parents of children with disabilities participated, as did parent and disability advocacy groups. The Oklahoma Part C program participated, along with other state agency partners and internal agency partners. The following is a list of participating individuals and groups. Some entities had more than one representative participate in discussions.

Advocates, related service providers, interagency partners, and families

Parents of children with disabilities

Community members

Oklahoma Directors of Special Services & the Cooperative Council for Oklahoma School Administration

Department of Rehabilitative Services

Oklahoma State University

Special Education Resolution Center

Sooner Success

Oklahoma SPDG III Team

IDEA-B Advisory Panel members

OSDE representatives

Special Education

Educator Effectiveness

School Support

Office of Accountability

Research

SoonerStart

Indian Education

English Learners Program

NAEP Office

Ada City Schools

Bristow Public Schools

Byng Public Schools

Central Public Schools

Cleora Public School

Cordell Public Schools

Dickson Schools

Fargo-Gage Schools

Glenpool Public Schools

Haskell Public Schools

Hooker Schools

Jay Public Schools

Ketchum Public Schools

Keys Public Schools

Kingston Public Schools

Lawton Public Schools

Lone Grove Public Schools

Macomb Public Schools

Public School Districts

Norman Public Schools

Grove Public School (Delaware County)

Pryor Public Schools

Skiatook Public Schools

Jenks Public Schools

Tulsa Public Schools

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Marble City Public School
McAlester Public Schools
Owasso Public Schools
Pauls Valley Public Schools
Sand Springs Schools
Snyder Public School
Stillwater Public Schools

Stilwell Public Schools
Tahlequah Public Schools
Tonkawa Public Schools
Wagoner Public Schools
Woodward Public Schools
Wynnewood Public Schools
Yukon Public Schools

As the year progresses, more stakeholders with expertise in the area of SIMR will be included in discussions about the root causes and the improvement strategies.

Part B State Advisory Panel Members

Parents of children with disabilities (14 individuals)
Individuals with disabilities (3)
Down Syndrome Association of Central Oklahoma
Oklahoma Parents Center (2)
Ardmore Public Schools, Special Education Director
Byng Public Schools, Special Education Director
Epic Charter School, Special Education Director
Oklahoma City Public Schools, general education (2 individuals: the Homeless Education Services Office and the Office for Equity and Innovation)
Ponca City Public Schools, special education teacher
Putnam City Public Schools, special education teacher
Oklahoma Schools Advisory Council, general education support
Bishop McGuinness Catholic High School, special education services (2)
Career Tech
OK ABLE Tech
Dispute Resolution Center
Oklahoma Department of Juvenile Affairs, Special Education Director
Oklahoma Department of Human Services, Childcare Services
Oklahoma Development Disabilities Council
OU Health Sciences Center, Autism Program
Oklahoma State University
University of Central Oklahoma

1. Data Analysis

Stakeholders compared quantitative national and state level contextual and outcome data to identify critical needs. Large and small group sessions provided opportunities for stakeholders to examine the data, review measurable results and select a focus area for the SIMR. The stakeholder engagement process is detailed in Section One of this report.

1(a): Process used for collecting and analyzing data, including timelines and methods

The state SSIP evaluation team conducted a broad data analysis using multiple sources across recent years, including the special education and statewide child counts, end-of-year data collections (existing, discipline, EC outcomes, and compliance), the APR, general data collections such as graduation and assessments, parent and post-secondary survey results, and disciplinary removals. Stakeholders reviewed aggregated and disaggregated national and state data trends, rankings, and areas of strength and weakness, for the following data:

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- The former SIMR: third grade reading proficiency in Tulsa County
- Identification rates by age group and disability category, compared to national trends
- Disability by race for the seven most common categories
- Educational placement, for both early childhood and school-age, and by race
- Outcomes for the past several years, compared to national averages for FFY 2017 (see the list in Table 1 of the main report)

Because of the short timeframe between the conclusion of the former SSIP and Phase I of the new SSIP, only the broad data analysis has been completed to date. The team used standard comparison methods for the analysis; in-depth root cause analyses and relationship assessments have not yet been conducted. The analysis was completed in January 2020, for presentation to stakeholders at the end of the month through mid-February. Meetings were held January 30 and February 11, 12 and 20. Another pair of meetings was first scheduled for February 5, but were canceled due to poor weather. They were rescheduled for February 19, but canceled a second time because of non-attendance. A follow-up survey was sent to the SAP to gather information about their preferences regarding the selection of disciplinary removals for the SIMR. As mentioned in Section One, 87 percent of respondents agreed that Oklahoma should focus on disparate discipline (suspension rates) in the new SSIP.

Data Comparisons to Establish “Intermediate Outcome” Value

To further establish the value of a SIMR related to discipline, the OSDE-SES data team has conducted statistical analyses to assess whether significant relationships exist between disciplinary removals and performance outcomes at the student level. The team analyzed the impact of discipline on graduating, dropping out and assessment scores (post-secondary outcomes were not analyzed because of the low response rate to the collection survey). Two measures of discipline were used: count of total removals and total days removed (in-school and out-of-school combined). The population of students analyzed consists only of special education students, though additional population characteristics vary depending on the outcome of interest.

The team examined state testing scores first, including only students who tested last spring (grades 3 to 8 and 11, on all test subjects). Using a univariate ANOVA test, with an interaction variable between assessment score and race, we found that the group of students with at least one removal during the year have a mean test score that is 11.2 points lower (on average) than students who have not been suspended (263 points versus 252). The mean difference is statistically significant ($p < 0.000$). More importantly, the mean score for non-removed students is near the boundary between “below basic” and “basic” scores (the two levels just below “proficient” and “advanced”). Students with at least one removal are 11.2 points lower, suggesting that removed students are substantially more likely to be scored at the lowest level compared to other students. The disparities in mean scores also vary by race, with discipline-based differences ranging between 2.4 points for Asian students to 11.5 points for White students.²⁶

Next the team assessed the relationship between graduating and disciplinary removals, studying only the population of students in the 2019 cohort who were expected to graduate last year. We conducted a one-tailed z-score test for two population proportions to determine whether there was a statistically significant difference in graduation rates between cohort 2019 special education students who had been disciplined throughout the year (rate = 74.91%), and those who had not (rate = 79.15%). The difference in graduation rates was 4.24 percent, a statistically significant difference. Students with at least one disciplinary removal between 7/1/2016 and 3/11/2019 had a

²⁶ Native American students: 10.2 points; Black: 5.4 points; Hispanic students: 8.2 points; Two or more races: 10 points; Pacific Islander: 7.4 points.

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significantly lower graduation rate than students who had zero disciplinary removals.²⁷ The rate disparities again vary by race, with discipline-based differences ranging between 2.9 percent for Hispanic and 5.2 percent for Black students.²⁸ No other factors were controlled for in this analysis as of yet.

Finally, discipline was analyzed for its impact on dropping out of high school. Using the student-level exiting data from SY 2018-2019, the data team found that students who had received at least one disciplinary removal between 7/1/2016 and 3/11/2019 had a significantly higher drop-out rate (rate = 19.49%) than students who had zero disciplinary removals (rate = 13.45%).²⁹ The difference in drop-out rates was just over 6 percent, a substantial disparity. Once again, the rate differences vary by race, with discipline-based differences ranging between 5.7 percent for Hispanic and 20.4 percent for Asian students.³⁰ No other factors were controlled for as of yet.

Table B.1: Summary of Outcome Disparities by Disciplined Status		
Outcome	Disciplined	Non-Disciplined
Assessment Mean	252 points	263 points
Drop-Out Rate	19.50%	13.50%
Graduation Rate	74.90%	79.20%

These findings (summarized in Table B.1) demonstrate that disciplinary removals have a substantial effect on students' long-term outcomes, and deserve specific attention in a substantial, organized, proactive state improvement plan.

1(b): Data disaggregation during the focused data analysis

The focused (root cause) analysis has not yet been completed. Starting in early summer 2020, OSDE-SES and stakeholders will conduct a root cause analysis to identify contributing factors and potential improvement strategies. At this stage, the evaluation team will consider a wide variety of factors that may be related to higher or lower rates of suspensions, including compliance, race, LEA and community characteristics (such as size and poverty), special and general education factors including student demographics, LEA programs to manage and improve behavior, teacher attitudes, knowledge and skills around positive behavioral interventions, and so forth. We will conduct a survey of LEAs to gather some of this information that is not readily available at the state level. CRDC data will also be used for this analysis.

1(c): Data quality concerns

The majority of data we collect for special education is highly reliable and valid because it is collected directly from eligibility documentation and IEPs in our online IEP system or through other state-wide mechanisms. Some data are self-reported, however, and discipline events fall into category. We suspect that disciplinary removals are under-reported by districts, especially in-school suspensions that districts do not always identify correctly. Furthermore, a portion of districts do not

²⁷ Proportion test: $z = 3.41$, $p < 0.000$.

²⁸ Native American students: 4.9% difference; Two or more races: 4.72%; White: 3.99%. Asian and PI groups had anomalous findings due to small populations: Asian students were more likely to graduate if they were disciplined (one of six versus 10 of 34), while Pacific Islanders had zero disciplined graduates ($N = two$).

²⁹ Disciplined: $N=549$; non-disciplined: $N=6595$; proportion test: $z = 3.92$, $p < 0.000$.

³⁰ Native American students: 12.9% difference; Black: 7.9%; Two or more races: 9.3%; White: 8.2%. Pacific Islanders had a reverse rate of -3.6%, meaning that students who were disciplined were less likely to drop-out than students who were not. This again is likely due to the small population size.

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report any disciplinary removals during a calendar year, which we question, but cannot verify the validity of such “submissions” because we do not have general student discipline data for the entire student population for comparison. These concerns about data quality would be a target area for infrastructure improvement in the SSIP.

1(d): Impact of compliance data on improvement

The analysis of compliance data has not yet been completed, but is scheduled as part of the root cause analysis this summer.

1(e): Additional data collection and timelines

As described in 1(b), additional data will be collected and used to conduct the root cause analysis and to define improvement strategies. Once the stakeholder meetings are scheduled, a preliminary data analysis will be completed to share with stakeholders.

2. Infrastructure Analysis

Stakeholders identified state, local and national infrastructure and contextual factors to define strengths, challenges, opportunities and risks (SCOR) in the data and infrastructure. Large and small group sessions provided opportunities for stakeholders to examine all infrastructure elements and to use that information to determine which result(s) need the most attention. The stakeholder engagement process is detailed in Section One of this report.

2(a): Process used to analyze current infrastructure capacity to support improvement

At this first stage, state personnel and stakeholders gathered and reviewed information from multiple sources to build a full picture of state capacity to improve student outcomes. We discussed current improvement initiatives at the state and local levels, the role of ESSA and the state plan, and the variety of partners and support organizations that exist.

The SCOR discussions linked data and infrastructure and helped stakeholders to identify areas of strength where additional action may not be needed at this time, and areas of weakness where action is necessary. Through the review of the ESSA plan, for example, we realized that a lot is already being done to promote graduation, secondary transition, student proficiency and early childhood readiness for all students. Stakeholders concluded from this review that any additional work by special education specifically might have little to no overall impact in these outcome areas. Rather, stakeholders were drawn to the nascent interest in trauma-informed education, growing movement towards addressing behavior holistically, and the lack of attention to disciplinary challenges. These trends encouraged to focus on discipline rather than other outcomes.

A deeper analysis of the state’s actual capacity to support growth in the SIMR will be conducted in Phase II this summer, once the SIMR is confirmed and fully defined. At that time, we will work through one of the TA tools available to assess infrastructure capacity.

2(b): Description of the state’s infrastructure

The following describes the current state systems that were analyzed as part of this process:

Governance:

Governing authority over education is held by the state legislature and the State Board of Education through the adoption of legislation and the approval of administrative rules and policies. A variety of rules and laws govern how education is provided to all students and how students with disabilities are served.

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State activities are also governed by ESSA and the state's federally-approved eight-year strategic plan to implement ESSA. Other federal laws such as the IDEA and the ADA govern how students with disabilities are served in the school setting.

Oklahoma's special education policies and procedures support state and local implementation of the IDEA. Agencies responsible for special education and related services must abide by Oklahoma State law, policies, procedures, and the federal regulations for the IDEA Part B and C. Agencies having these responsibilities are: local educational agencies (LEA), public charter schools not otherwise included as LEAs, other public agencies (e.g., State schools for students with deafness and blindness and State and local juvenile and adult correctional facilities), and accredited private schools and facilities as described in the applicable federal regulations and established by Oklahoma State laws.

The OSDE-SES has outlined specific strategies for implementation of the IDEA in the Oklahoma Special Education Handbook. Additional information about Oklahoma's policies and procedures are included in the Oklahoma Special Education Policies and the Oklahoma Special Education Process Guide (all available at <https://sde.ok.gov/special-education>). LEAs are responsible for developing policies and procedures and ensuring effective implementation. LEAs are required annually to complete the Local Education Agency Agreement for Special Education in Oklahoma which ensures all eligible students in the LEA will have access to a free and appropriate public education (FAPE) (34 CFR § 300.17). In addition, LEAs are required to submit Local Education Agency Assurances which demonstrate that the LEA understands its responsibilities under the IDEA.

The OSDE-SES develops policies and procedures with the support of the IDEA B State Advisory Panel for Special Education (SAP). The SAP serves as an advisory group to the OSDE-SES on issues related to special education and related services for students with disabilities (34 CFR §300.167). The SAP includes the following stakeholders: parents of students with disabilities; individuals with disabilities; state and local education officials; state and local agency representatives; general and special education school administrators and teachers; advocacy groups; representatives of institutions of higher education that prepare special education and related services personnel; representatives of private schools and charter schools; representatives of vocational, community, and business organizations concerned with the provision of transition services to youth with disabilities; and representatives of state juvenile and corrections agencies (34 CFR §300.168). The SAP participates in the annual review and revision of the SPP-APR. This includes participation in the development of state targets, the review of data of improvement activities, and making suggestions for updates to the activities and targets. More information, including the Operating Guidelines, is available at <https://sde.ok.gov/idea-b-advisory-panel>.

Fiscal:

Funds are awarded to the OSDE by the United States Department of Education (USDE), Office of Special Education Programs (OSEP), to "flow-through" to the LEA contingent upon an LEA's application for Part B funds. IDEA Part B funds are awarded on the basis of noncompetitive application.

Section 611 flow-through funds are for children with disabilities aged three through twenty-one, and are awarded on a formula based on:

1. The number of children with disabilities aged three through 21 served on October 1, 2019;
2. The total enrollment in the LEA (in both public and private schools located in the LEA); and
3. The poverty level of the LEA (defined as the free and reduced lunch count within the LEA).

Section 619 preschool funds are earmarked for children with disabilities aged three through five, and are awarded on a formula based on:

1. The number of children with disabilities aged three, four, and five served on October 1, 2019;
2. The total enrollment in the LEA (in both public and private schools located in the LEA); and

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3. The poverty level of the LEA (defined as the free and reduced lunch count within the LEA).

Oklahoma's system of general supervision includes a process to oversee the distribution and use of IDEA funds at the state and local levels. Information on these processes can be found in the Special Education Funding Manual for IDEA Part B, available at <https://sde.ok.gov/finance>.

Oklahoma also awards funding to LEAs through its State Aid allocation mechanism, and is distributed among LEAs based on each one's annual child count of regular education students and the special education child count, based on the number of primary and secondary disabilities and related services being served.

Quality Standards:

Educational standards are set by a variety of governing bodies, including the OSDE with the support of the State Board of Education and the legislature. The Oklahoma Academic Standards are available at <https://sde.ok.gov/oklahoma-academic-standards>. Evidence-based practices and standards are promoted by a variety of advocacy and service organizations in the state and nation, depending on their area of interest.

Professional Development:

Professional Development ranges from a basic level of providing general information to targeted and intensive PD, which is focused on data driven school improvement in LEAs, schools and classrooms. The OSDE-SES offers PD or suggests PD resources based on various concerns in collaboration with other divisions in the agency. PD is provided in three ways: 1) as requested by LEAs, school sites, teachers, or other interested stakeholders; 2) providing professional development resources for use by LEAs, school sites, teachers, or other interested stakeholders; and 3) as part of regional or statewide conferences hosted by the OSDE, other state agencies, or technical assistance centers. The OSDE-SES has also implemented an online professional development platform (PEPPER) accessible through the online IEP system and webpage. Special Education teachers and staff have access to additional modules and may be directed by district leadership or the OSDE-SES, through compliance monitoring, to complete selected modules.

Additionally, the OSDE-SES contracts with other agencies and providers to ensure that service providers have the skills to effectively provide services that improve results for children with disabilities. A few examples are agreements with Oklahoma ABLE Tech, the Oklahoma Autism Center, the Oklahoma Parents Center, the Cooperative Council for Oklahoma School Administration, the Oklahoma Department of Rehabilitation Services, and other partner organizations and individuals. Training and support to families is also incorporated into professional development activities in certain circumstances.

Other offices in OSDE provide professional development to LEA personnel related to their areas of work, including in the areas of alternative education, curriculum and instruction, migrant services, child nutrition, English learners, educator effectiveness, and many others. The OK SPDG III team works with many districts in the state to develop and enhance their MTSS approaches to improving academics and other student needs. Few are using MTSS approaches to managing behavior yet, but this will increase once the work with the SWIFT Education Center comes to fruition.

Data:

As part of Oklahoma's general supervision responsibilities, data are used for decision making about program management and improvement. This process includes: 1) data collection and verification, 2) data examination and analysis, 3) public reporting of data, 4) status determination, and 5) improvement activities.

Data are collected primarily through an online IEP system that permits full documentation of all aspects of the referral, eligibility and IEP processes. Student and district level compliance and outcome data are collected through the system, with the exception of assessment proficiency, parent

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involvement and post-secondary outcomes. These are gathered through contracts that manage statewide assessments and collection surveys.

Other offices in OSDE provide collect data from LEAs related to their areas of work, including in the areas of alternative education, curriculum and instruction, migrant services, child nutrition, English learners, educator effectiveness, and many others.

Technical Assistance:

Technical Assistance (TA) is designed to link directly to indicators in the SPP/APR and to improve the level of compliance in LEAs. The comprehensive approach to technical assistance enables the OSDE-SES to differentiate the scope of services provided for LEAs based on local needs. For example, the OSDE-SES makes TA available for all LEAs through a variety of mechanisms on many topics:

- the Oklahoma Special Education Handbook,
- best practices for the use and implementation of accommodations,
- the special education online IEP system,
- high quality data collection and reporting,
- the differentiated monitoring process, and
- high quality financial accountability and budgeting, among others.

TA ranges from general levels, such as providing a review of best practices, to providing targeted technical assistance (TTA), which includes more focused levels of support such as the state directing root cause analysis and monitoring of CAP development and subsequent correction.

TA includes providing documentation of evidence-based practices and disseminating examples of success to assist others in planning, implementation and use of tools to achieve positive outcomes.

Other offices in OSDE provide technical assistance to LEAs related to their areas of work, including in the areas of alternative education, curriculum and instruction, migrant services, child nutrition, English learners, educator effectiveness, and many others.

Accountability/Monitoring:

In accordance with the IDEA, the OSDE-SES employs general supervision activities that include monitoring LEAs with particular emphasis on improving educational results and functional outcomes for all students with disabilities while ensuring that LEAs meet the requirements of the IDEA Part B. The OSDE-SES implements procedures for monitoring activities in accordance with the IDEA Part B, federal regulation 34 CFR § 300.600. Other offices in OSDE also monitor LEAs and hold them accountable to various state and federal requirements, depending on the office's governing authority.

Multiple data sources are used to monitor special education programs for compliance and improvement. These data sources include, but are not limited to, the online IEP management system, Oklahoma's School Report Cards, other quantitative and qualitative data, and critical and/or special investigative audits and findings related to special education. When issues of concern are brought to OSDE-SES's attention regarding an LEA's implementation of IDEA, a selective review may be conducted to determine the level of concern and assistance needed.

Oklahoma's comprehensive monitoring system is designed to: a) identify areas of compliance and noncompliance from a variety of sources; b) assist LEAs in correction of identified noncompliance with the IDEA Part B requirements and Special Education policies and procedures (within 12 months of the notification of non-compliance); c) assist LEAs with the development of corrective action and program improvement plans; d) ensure that identified noncompliance is corrected as soon as possible, but no later than one year from the time of identification; e) provide the LEA sites with support and technical assistance; f) verify that the data reported reflect actual practice; and g) ensure consistency with the requirements set forth in the Office of Special Education Programs (OSEP) Memorandum 09-02.

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OSDE-SES adopted a new differentiated monitoring approach (see the manual at https://sde.ok.gov/sites/default/files/General%20Supervision%20System%20DMS%20v2019_0.pdf) to assessing and supporting district accountability in the fall of 2017. OSDE-SES identifies a differentiated monitoring result (DMR) for each LEA in Oklahoma based on an assessment of risk and the district's determination rating. This DMR initiates a series of integrated monitoring and improvement activities required to be completed by the LEA. These activities correspond with a "level of support" that the OSDE-SES determines is necessary for the LEA to meet requirements and mitigate risk in subsequent years. An LEA's DMR and associated level of support are determined through a comparison of the LEA's risk score and determination rating: a LEA will be placed in the level of support that corresponds to the more problematic of the two outcomes.

Several mechanisms are available through the OSDE to assist in resolving disputes (see <https://sde.ok.gov/special-education-dispute-resolution>). These processes include IEP facilitation, mediation, formal complaints, due process hearings, facilitated resolution sessions and expedited due process hearings. The Special Education Resolution Center (SERC) manages the special education due process hearing system for the State of Oklahoma. SERC's duties have been expanded to implement innovative programs to assist parents and LEAs to settle disputes at the earliest stage possible. At no cost to either party, SERC provides highly trained mediators to assist with disputes which may develop at any time during the relationship of the parties over special education issues and highly trained facilitators during required resolution sessions of due process. SERC also provides stakeholder training that supports mutual collaboration. More information on SERC is available at <http://serc.okstate.edu>.

2(c): Description of current strengths, extent of coordination and areas for improvement

The different components of the infrastructure support system are well aligned to oversee and support special education services in the state. In recent years, OSDE-SES has worked diligently to ensure that data, monitoring, TA and PD are all aligned to identify struggling districts and support their improvement in all areas of compliance and results.

The system-wide strengths as identified by stakeholders, in no particular order:

- On-going SPDG grant focused on MTSS implementation
- SERC and other partnerships to support districts
- Long-term data is accessible and usable
- District access to online professional development and training
- OSDE intra-agency collaborative structure and strong relationships
- Partnerships in state with other groups and agencies
- A lot of data available to share
- Data transparency
- Graduation rate, comparable to other states
- ICAP project
- ESSA-related projects

The system-wide opportunities as identified by stakeholders, in no particular order:

- New efforts to develop culturally-responsive classes, trauma-informed education, mental health support in schools, equity in schools, etc.
- Improve data collection on discipline to create better picture of gaps, services, needs, in comparison to general education
- School support works with federally-designated schools with intentional, hands-on support
- ICAP project and opportunities to link to secondary outcomes and post-school outcome data collection
- Behavior summits and related efforts
- PBIS, OTISS, MTSS efforts

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- Train the trainer models to take knowledge back to districts
- Grants and funding available for mental health school supports, counselors, behavior coaches, consultants...
- Dyslexia and science of reading trainings
- Internships for high school students
- Online education programs (not alt education) managed within districts
- More PD topics being offered at no cost to districts on variety of topics
- More collaboration with gen education
- Co-teaching and shared service provision
- Vocational rehabilitation
- Local higher education as resource

The system-wide challenges as identified by stakeholders, in no particular order:

- EL and SPED identification being intertwined in some cases
- State personnel capacity is not sufficient to provide all the in-person PD training desired by districts
- We have older kids still learning to read
- Definition of graduation
- Discipline and behavior issues in schools and different versions of what is acceptable
- Increased mental health needs among student and parents
- Parents often don't understand the SPED process
- Novice teachers
- Hard to get new teachers trained; there's no time
- SPED teachers not well-enough trained by higher education
- Mindset is not yet that all kids are our kids
- Need teachers to know how to teach reading
- Need for evidence-based practices and support in implementing them
- Data are interesting, but raise even more questions
- Discipline data quality and validity are problematic
- There are differences across the state in interpreting behavior and the need for discipline
- External collaboration with tribes
- Cultural mis-interpretations of behavioral needs
- Shortage of special education teachers
- Students not qualifying for OAAP but not ready for state assessments
- Chronic absenteeism
- Disengaged parenting
- Lack resources for mental health issues
- Increase in extreme behavior, with few behavior specialists to help manage

Note that specific strengths and areas needing improvement relevant to the exact SIMR selected will be identified during the summer discussions, when the root cause analyses are conducted.

2(d): Plans and initiatives, alignment and integration

As described in previously, additional analysis of the state infrastructure, including current plans and initiatives related to the SIMR, will be completed in the next stage of Oklahoma's SSIP process. This information will be used to inform the root cause analysis and define the coherent improvement strategies.

2(e): Additional stakeholder information

Please refer to the “Stakeholder Input” section at the beginning of the Appendix for information on who was involved and in what way.

3. Description of SIMR

The description of the SIMR, baseline data and possible targets are presented in Section One of the main report, as is the process used to select the SIMR. A deeper analysis of state and local data and infrastructure will be conducted in the summer, once the SIMR is finalized and the measure is precisely defined. The 2021 report will describe how the choice of the SIMR is supported through these analyses, and how it is aligned with other agency initiatives and priorities outside the ESSA.