Evanston-Skokie School District 65 Special Education Review

Final Report

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Overview Summary

Special education programs operate within the broader educational system and are specifically designed to serve the needs of students who require additional support in achieving their individualized academic and functional goals. These programs are developed collaboratively by educators, administrators, families, students, and other team members. Effective special education programs are integrated into a continuum of services that promote inclusion and collaboration, ensuring that students with Individualized Education Programs (IEPs) receive the support they need in the least restrictive environment (LRE) appropriate to their needs. A well-implemented special education system is both effective-ensuring meaningful progress toward IEP goals- and efficient, using resources strategically to deliver high-quality, compliant service across the district.

Evaluation Notes

Why: This review looked at the efficiency and effectiveness of the Evanston-Skokie School District (ESSD) special education program to provide considerations to support the district with alignment with practices that would increase programmatic and fiscal efficiency.

How: Our analyses are based on document and data reviews and interviews.

Who: The Chief Financial Officer and Special Education Leadership participated in this review.

When: The majority of the review took place from July through October 2025, with work being paused from August 8, 2025, through September 10, 2025, pending full execution of the contract with WestEd.

Introduction

ESSD, located in Evanston, Illinois, serves approximately 6,500 students in pre-kindergarten through grade 8. The special education program has focused heavily on fostering inclusionary practices within the district over the last several years and is committed to delivering instruction aligned with state standards while meeting the unique needs of its student population.

ESSD initially partnered with WestEd during the 2019-20 school year for a targeted review of its resources, programs, and policies that impact the outcomes of students with disabilities, with a focus on equity and efficiency. The purpose of the current targeted review is to look at current data and practices to evaluate the current impact of ESSD's special education program and to identify systemic and organizational improvements that can enhance outcomes for students with disabilities. WestEd's review is grounded in research on systems thinking, organizational development, leadership and instructional practices, and school structures designed to support all learners, with additional focus on evidence-based practices for students with behavioral and emotional needs.

This report is intended to support improvements in the effectiveness and efficiency of ESSD's special education program, while recognizing and honoring the strengths of the system's current structure and approach. It aims to provide an objective analysis and actionable recommendations that can support dialogue and collaboration across the district, helping to support more effective, efficient, and inclusive programs and services for all students with disabilities.

To inform this analysis, the WestEd team reviewed available data and documents submitted by the district in addition to survey results to gain an understanding of ESSD's context and operations. For this review, the emphasis was on special education staffing, out-of-district placements, required special education transportation, the current model of special education in the district, and maintenance of effort (MOE) requirements. In addition to any available data and records, the ESSD team provided policy and procedural documents, student outcome information, and engaged in interviews with the WestEd project team to gather information about current practices within the district.

It is important to note that ESSD has many assets and positive practices in place - structures that have been developed, implemented, and sustained over time, as well as a team of engaged special education leadership staff who are open and willing to look at system-level changes to improve outcomes for students, as well as the overall functioning of the program as a whole. While the current system has clear strengths that can be acknowledged, areas for growth remain. As such, the report focuses primarily on identifying gaps, which serve as the foundation for improvement. The fact that more words and space are dedicated to areas for improvement should not be interpreted as an indication that ESSD's strengths are less significant.

Key Objectives

Key objectives were chosen to examine the design, delivery, and effectiveness of special education programs and services within ESSD. WestEd partnered with ESSD to review and analyze:

1. Current district practices, procedures, data, and costs for the ESSD special education program, with specific emphasis on:
    - special education paraprofessionals, special education teachers, and related service providers,
    - out-of-district placements,
    - staffing models and levels,
    - required special education transportation, and
2. the current model of special education and the continuum of services for students with disabilities,
3. current identification and student outcome data from the district to complete an updated data analysis,
4. the district's special education fiscal records, including historical and current data related to MOE,
5. the district's MOE obligations and the potential impact of the reduction in the state and local special education expenditures on the district's Individuals with Disabilities Education Act (IDEA) Part B federal funding.

Methodology

To conduct a review of special education programming within ESSD, WestEd employed a limited approach that included both quantitative and qualitative data collection. Data were gathered through a combination of interviews, review of publicly available district and special education data, and analysis of provided documentation.

Data and Document Analysis

Off-site data collection methods included an extensive review of existing documents and data, such as district policies, plans, procedural guidelines, and student outcome data related to special education. Public data available through the Illinois State Board of Education was used to gather both programmatic and fiscal data. In addition, WestEd reviewed online surveys that were obtained by the district regarding special education practices to supplement findings and gather broader input.

Virtual Interviews

Interviews were conducted with both the programmatic and fiscal team members to gain additional insight into current practices as well as to clarify or ask additional questions about the data and documents that were reviewed. Interviews were conducted regarding the overall special education program, budgeting processes, monitoring of expenditures and maintenance of effort requirements, staffing levels, and processes for determining staffing, including use of contracted service providers, multi-tiered system of supports within the district, and the continuum of service options, including out-of-district placements.

Review Findings

Findings and recommendations in this report are based on the analysis of data collected from ESSD through interviews and review of submitted documents. The targeted nature of this review only included review and analysis of the data and documents provided by the district, district-administered survey results, and interviews with special education and fiscal staff, and did not include site observations, focus groups, and surveys beyond what was provided by the

district for review. The following areas represent the focus of the review and include a summary of information gathered to provide insight into current practices and needs within the special education program.

Special Education Programming

Current Model of Special Education

District Special Education Programs and the Continuum of Options

The ESSD team was interviewed on June 18, 2025, and July 24, 2025, to gather additional information about programs and the continuum of options in this district. The special education leadership staff interviewed describes placement decisions as occurring through the IEP team meeting after reviewing the student's present levels, goals, services, and accommodations/modifications. Placement in the least restrictive environment is central to discussions and decisions regarding placements in particular programs, including out-of-district placements, with the team reviewing data to inform those discussions. The data typically includes progress on IEP goals; frequency and intensity of interventions provided; service fidelity; MTSS data; behavioral data (including frequency and duration of student behaviors); safety plan implementation; academic testing; as well as discussing any outside influences that may be impacting the student.

District staff reported that there has been an improvement with staff members becoming more informed about specialized programs within the district, with IEP team members visiting the programs to become more familiar with them before discussing the placements at meetings. When considering more restrictive placements, the reported process is for the Individualized Education Services (IES) Coordinator to notify the Director and provide background information and data which is sometimes followed by the IES coordinator or the Director conducting informal observations of the student to provide feedback and recommendations to the IEP team. District staff may also be supported by a contracted Board Certified Behavior Analyst (BCBA) for consultation or completion of a functional behavioral analysis and behavioral intervention plan, when appropriate.

When considering a change of placement into a less restrictive environment, the team also looks at an analysis of the student's goals and overall progress with the IEP team, determining what the most appropriate placement is for the student, relative to their needs, goals, and services.

The process described by district staff for considering placements along the continuum of options is in alignment with best practices and IDEA statute and regulations.

It was reported by the special education leadership team that the district chose to eliminate the cross-categorical classrooms over the past 5 years to focus on inclusion and co-teaching within the district, which consequently changed the continuum of service options available within the district. In addition to co-taught classrooms, resource support services are using a "pull-out" design. There are specialized classrooms and programs within the district to address a wide range of student needs, including:

- Rice Children's Center, which is a therapeutic day program, with support for students needing more socio-emotional and behavioral support, with 21 students enrolled in two classes.
- Park, which supports students with more significant developmental, physical, and medical needs and currently has 55 students enrolled.
- Structured Teaching Education Program (STEP) self-contained program, is designed to support students through the development and strengthening of social, academic, and communication skills, independence, and learning stamina across school settings (Located at Lincoln, Washington, Lincolnwood, and Nichols).
- Rigorous Individualized Specialized Education (RISE) self-contained classrooms, which have systems in place to support students with moderate to significant disabilities needing special education instruction for more than 50 percent of the school day (King Arts, grades K-8).

Multi-Tiered System of Supports

Multi-Tiered System of Supports (MTSS) is a focus in the district and represents an overarching system that includes special education. While MTSS is not specific to special education, it is included in this review because the framework supports all students and, when implemented well, can help reduce special education referrals as students are supported with interventions within the general education environment.

The Director of MTSS was interviewed on October 7, 2025, to provide information and insight into the current MTSS system in the district.

School site MTSS teams are comprised of an interventionist, administrator, instructional coach, school psychologist, and sometimes other positions, such as related service providers and general education staff. This team comes together at least three times per year, where they review screener data, discuss students who have not moved out of requiring tier three support, and look at the overall health of their MTSS system. Some sites meet more regularly to engage in problem-solving around academic needs, with a goal for socio-emotional needs to also be addressed through these meetings in the future. Some interventionists also attend grade or content level meetings once a month to discuss interventions or student concerns.

The Director of MTSS reported variability in MTSS across school sites, with interventions, professional development for MTSS, dedicated collaboration time, fluency with progress monitoring, student-centered scheduling, and data use all depending on the site. While there are some schools that could be considered exemplars for MTSS, there are others where MTSS implementation has been challenging, indicating a lack of consistency and cohesion across the district.

It was reported that Universal Design for Learning (UDL) and lesson planning are not currently occurring at the school sites, and that it appears it is due to a lack of knowledge and understanding of how to do it, not an unwillingness to engage in the activities.

Over the past three years, there has been an increased focus on dually identified students having both a disability and being an English language learner. This has included collaboration with school psychologists on how these students are evaluated and qualify to ensure there are consistent practices across the district. Goals for the MTSS program are aligned with the district's strategic goals, with an overarching goal of partnership and alignment across teams at school sites to support overall engagement with MTSS.

It is important to note that MTSS was also reviewed during the WestEd special education review that took place in 2019-20, where building upon and improving consistency with MTSS practices across the district was a recommendation.

Special Education Staffing

The special education leadership team was interviewed regarding special education staffing on August 4, 2025. Additionally, staffing levels by school site, salary information, and contracted services were looked at to provide a comprehensive overview of current staffing within the district for special education and related services.

Table 1. Site-level Enrollment, Students with Disabilities Percentage, and Staffing Data.

	Student Enrollment	SWD Percentage	School Psychologist	Speech and Language Pathologist	Social Worker	IES	Paraprofessional
Chute	564	20%	1	1	3	13	13
Dawes	299	18%	1	1	2	6	14

Dewey	330	15%	1	1	2	5	10
Kingsley	322	12%	1	0.6	1	5	8
Lincoln	380	15%	1	2	2.6	7	19
Lincolnwood	304	16%	1	1	1	6	20
Oakton	350	17%	1	2	2	7	13
Orrington	245	17%		0.6	1	5	8
Walker	385	14%	1	2	2	6	10
Washington	423	16%	1	1	2	8	22
Willard	369	15%	1	1	1	5	9
Haven	676	12%	1	1	3	13.3	6
Nichols	622	17%	1	1	3	13	9
Rhodes	274	18%		1	2	4	6
King	413	21%	1	2	3	14	25
Hill	220	24%					
Park			1	2	1	10	35
Rice			1		2	6	

Source: ESSD Provided Data

Table 1 above breaks down staffing amounts per school site, including the percentage of the site population receiving special education and related services. Additionally, Illinois State

Board of Education (ISBE) reports, through the District Snapshot of the Illinois Report Card, the following staff-to-student ratios compared to the state average for 2025:

	ESSD	State
Social Workers	174:1	420:1
Psychologists	380:1	871:1
Counselors	672:1	491:1
Elementary School Teachers	14:1	17:1
Administrators	112:1	136:1

Source: Illinois State Board of Education

With the exception of school counselors, ESSD student-to-staff ratios for the above-listed positions are below that of the state average for 2025. Currently, ESSD has 18 psychologists and 1 vacancy, for a total of 19 allocated for the district, which continues to support caseloads for psychologists being both lower than the current state average as well as the National Association of School Psychologists recommended ratio of 500:1. ESSD has 37.6 social workers allocated for the district, which also supports caseloads remaining below the state average and below the School Social Work Association of America recommendation of 250:1. What is not represented in these ratios is the variation in activities these professionals may be responsible for that could be different across the state. For example, school social workers and psychologists could be responsible for counseling and crisis support in one district, where in another, the school counselor may be responsible for those types of activities, which may impact how many staff the district may feel is needed for each role.

Throughout interviews with the special education leadership team, ensuring appropriate levels of staffing to meet students' needs was identified as a priority. The district has drafted comprehensive work plans to assist with determining appropriate workloads for Special Educators, Speech and Language Pathologists, and School Social Workers. These plans are required to be developed in collaboration with the Joint Special Education and Inclusion Committee as outlined in the Professional Agreement between the Board of Education of School District and District 65 Educators' Council. The plans encompass a multi-faceted approach to looking at workload levels with consideration for additional responsibilities these professionals have within the district, such as crisis, meetings, paperwork/ caseload management, and assessment, which provides a more comprehensive analysis of workload compared to a standard number of students assigned to each staff member.

It should also be noted that, for ESSD, special caseload management for students on a Section 504 accommodations plan is included in the workload plan. Section 504 falls under general education and was not included in this review. It is important to note this, as this responsibility may or may not be typical of special educators in other districts; however, it is included as a consideration in the workload planning for ESSD special education staff, so the time required for this activity is represented in their overall responsibilities.

In addition to direct service providers, the district uses a model of scaffolded leadership to include IES Coordinators who report to the district Special Education Director. These positions focus primarily on compliance with additional responsibilities, including family partnership, coaching, and training, with the goal of increasing this in the future.

Table 2. Evanston-Skokie Salary Data for Special Education Positions.

Position	Total FTE Included	Average Salary (excluding <1.0 FTE positions)
Occupational Therapist	12 FTE	$87,716
Psychologist	17 FTE	$104,718
Speech and Language Pathologist	26.2 FTE	$93,460
Social Worker	35.9 FTE	$86,246
IES Educator	27.3 FTE	$84,579
IES Educator Bilingual	13 FTE	$99,738
Paraprofessional	187 FTE	$31,654

Source: District Provided "ES Salary Information".

The ISBE school report card indicates that Evanston-Skokie has an average salary of $94,901 for all teachers, with the statewide average salary for teachers being $78,495. Salary information was submitted by the district for review and is included in Table 2 above. The average salary for the IES educators was also higher than the statewide average teacher salary. It should be noted that this is an average of the salaries included for each role, with variability in individual salaries dependent on where they fall on the district salary schedule.

Paraprofessionals

Additional adult support for students, through the use of paraprofessionals, is a related service that IEP teams can consider and include in students' IEPs to address academic, medical, and/or behavioral needs. Through this review, district procedures and practices were discussed and reviewed to establish how these services are added and removed from student IEPs, as well as the role of the paraprofessional as a related service within the district.

The district has developed documents and processes to support IEP teams with making decisions regarding the use of paraprofessionals. The "Instructional Assistant Request Form" for the 2021-22 school year, which includes an "Intensive Needs Checklist" and "Assistance Needs Matrix" for use internally to support IEP team discussions and outline procedures for requesting paraprofessional support.

Within the draft copy of the "Procedural Guide for Equitable IEPs," there is additional language around the requirements prior to IEP teams adding paraprofessional support:

> "Prior to adding paraprofessional support as a related service, the Paraprofessional Referral and Assistance Checklist must be completed and shared with building administration and the Assistant Superintendent of Student Services. Once this support is recommended and added to the IEP, a Paraprofessional Fading Plan must be developed with a plan for regular data collection and review."

Through interviews, it was reported that while there are procedures and guidance documents in place that this is an area where additional improvement is needed, particularly for ensuring that all sites and staff are following the current procedures and that there are focused efforts to measure progress and fade this support, when appropriate.

Contracted Service Providers

Contracted service providers are used by the district to fill special education positions when needed. Currently, the district has shared that they are only using one company, Epic, and they currently have 13 paraprofessional positions and one occupational therapist under contract. For contracted paraprofessionals, the bill rate ranges from $58 to $67/hour, with an average of $61/hour. The occupational therapist bill rate is listed as $85/hour, with no other additional positions being covered through contracted services at this time.

While contracting for services can be an effective way to ensure that positions are filled and student services are provided, it does typically come at an increased cost in comparison to hiring staff within the district. Tracking and monitoring of contracted paraprofessional placements can support making strategic shifts in staffing as students fade off or no longer require services.

Expenditure amounts for "purchased services", which may include costs in addition to contracted service providers, for special education were found on the submitted historical Annual Financial Reports and show a large increase in expenditures in this area in 2023 and again in 2024:

- 2021: $725,836
- 2022: $715,801
- 2023: $1,692,707
- 2024: $3,753,464

Historical tracking of contracted services for special education was not available for review to determine if there have been changes to the types of services contracted.

Out-of-District Placements

Information about out-of-district placements was obtained through a review and analysis of submitted documents and an interview conducted on July 24, 2025. It should be noted that while the current administrator overseeing out-of-district placements has collected comprehensive data, it was reported that this was not a practice by the district historically, so available longitudinal data is limited.

The district has one primary administrator, the Manager of Student Specialized Services, leading and overseeing out-of-district placements, which appears to be a very effective model for this district, offering cohesion and continuity for staff, family, students, and contracted placements. It was clear she has a depth of knowledge in this area and has reportedly developed strong relationships with local placement options. Additionally, "Outplacement Procedures", "Checklist for Change of Placement Decision Making", and "Placement Consideration Checklist" are in place at the district to support teams in both understanding current practices regarding outplacements as well as to guide them through what should be considered by the IEP team.

For out-of-district placement decisions, the process follows the same discussions and data review as is described above for any placement along the continuum of options available within the district. For out-of-district placements, there is an added component of thoughtful reintegration back into less restrictive placement options within the district, which can include wrap-around services and supports. Placement schools typically also have benchmarks the student would meet to support moving into a less restrictive placement, and IEP teams would discuss progress on goals and consideration of supports needed in the home and school environment.

ESSD currently has 68 students in out-of-district placements, with available historical data included in Table 3 below. Of note is that 53 of these students require special education

transportation to these placements, with 20 also requiring aide support while being transported. Student data in this area will be fluid due to placement changes throughout the school year, students moving in and out of the district, and will also include students represented over more than one school year due to the length of placements. During the 2023-24 school year, LEA staff reported 10 students in out-of-district placements began re-integrating back into district schools, with another 10 students beginning to re-integrate in the 2024-25 school year.

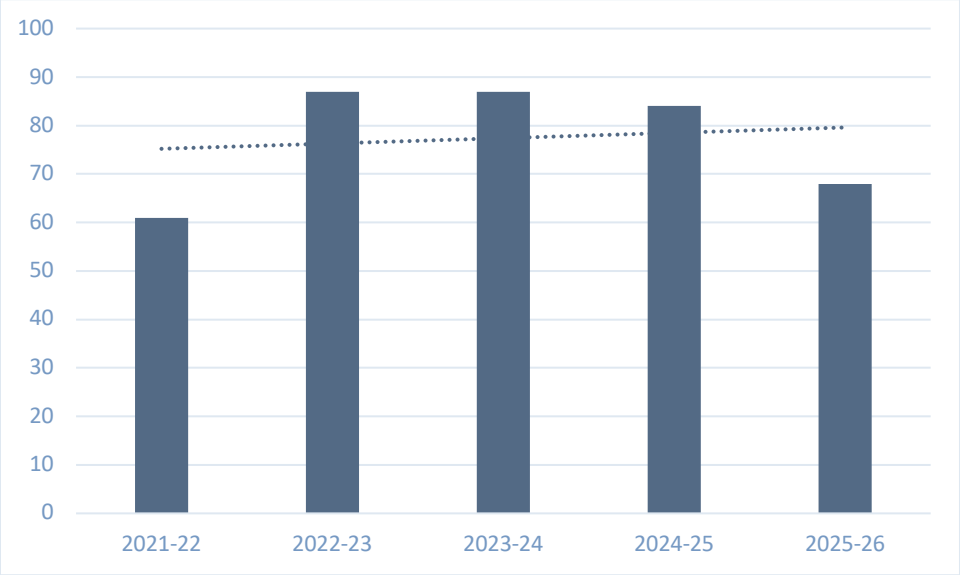
Table 3. Total Students in Out-of-district Placements by Grade Level.

	2021-22	2022-23	2023-24	2024-25	2025-26
Pre-K	1	1	1		
K		1	2	1	
1	2	1	4	3	2
2	0	5	4	7	5
3	3	5	5	6	6
4	8	6	8	6	7
5	7	11	13	10	7
6	7	19	13	11	10
7	14	11	22	20	9
8	18	22	14	18	21
Total	**60**	**82**	**86**	**82**	**67**

Source: "Private Therapeutic Day Placements" Excel document provided October 27, 2025.

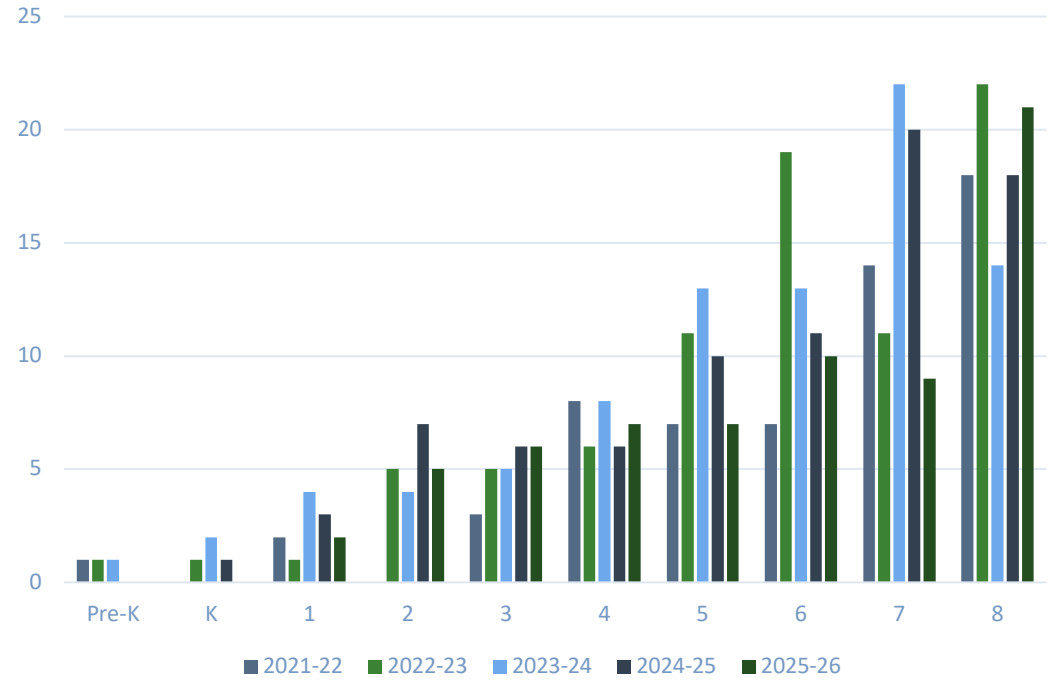
Note: The 2025-26 school year is still in progress. Data from this year does not reflect a total for the school year, rather a snapshot of the current number of student placements.

Figure 1. Total Student Out-of-District Placements by Year.



Source: "Private Therapeutic Day Placements" Excel document provided October 27, 2025.

Figure 2. Out-of-district Placements by Grade Level and Year.



Source: "Private Therapeutic Day Placements" Excel document provided October 27, 2025.

This data shows general consistency in the total number of students in out-of-district placements, particularly from 2022-23 through 2024-25. Considering the current school year would consist of partial data, it cannot be determined if the district saw a decline in total placements this school year. Additionally, aggregating the data by grade level shows the most placements occurring with students in grades 6 through 8, showing students in these grades, in general, requiring more restrictive placements in comparison to students in younger grades.

Tracking out-of-district placements is important for several reasons. First, placements are typically a more significant cost on district budgets, particularly if a student requires daily specialized transportation or residential services. In the current year, the daily rates for placements range from $199.78 to $922.47 per student. Monitoring placement tuition, residential, and transportation costs to forecast budgeting needs, as well as track potential exceptions to LEA MOE, is an important function of this data. Also, using this data to help guide conversations about district-wide program needs will help to ensure that services and less restrictive program options are developed and considered.

Special Education Transportation

Requirements for special education transportation can be found under 34 CFR 300.34, where it is listed as a related service, "required to assist a child with a disability to benefit from special education." Transportation is further defined in 34 CFR 300.34(c)(16) to include travel to and from school and between schools, travel in and around school buildings and specialized equipment, if required to provide special transportation for a child with a disability. Students whose IEP teams have determined that they require special education transportation in order to benefit from their educational program and have included that in the student's IEP are required to be provided with that transportation at no cost, which is emphasized in the memorandum to the district from Franczek dated January 15, 2025.

Table 4 below shows transportation costs specific to special education from 2008-09 through 2023-24. These costs should be inclusive of costs associated with required transportation to school sites within the district, as well as to out-of-district placements for students in day programs as well as residential settings. These costs may also include specialized equipment needed for transportation. The district has also contracted with BriteLift, a transportation broker that provides accessible transportation services when needed. Data provided by the district shows a total of 21 students being transported by BriteLift, with one-way trips ranging from $60 to $72.50 for a total cost per day of $2,585, or $454,960 per school year. Tracking data provided by the district for out-of-district placements indicates there are 53 students currently requiring transportation to and from special education programs outside of the district.

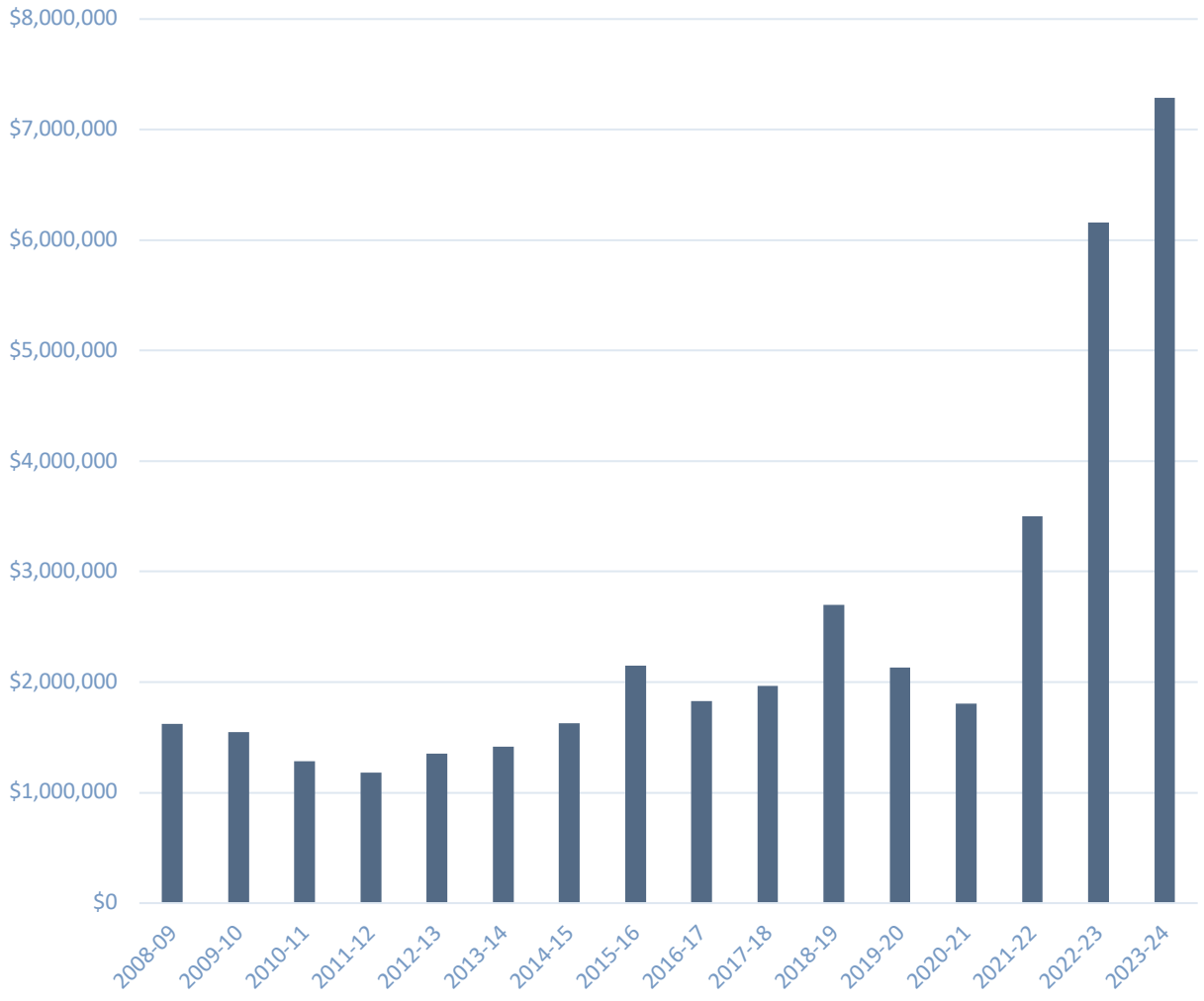
Table 4. Special Education Transportation Costs by Year.

Year	Special Education Transportation Costs
2008-09	$1,622,100
2009-10	$1,545,715
2010-11	$1,286,692
2011-12	$1,183,448
2012-13	$1,351,610
2013-14	$1,414,915
2014-15	$1,629,505
2015-16	$2,147,804
2016-17	$1,826,884
2017-18	$1,965,471
2018-19	$2,696,584
2019-20	$2,132,864
2020-21	$1,804,542
2021-22	$3,498,616
2022-23	**$6,156,658**
2023-24	**$7,285,448**

Source: "Evanston 65 Maintenance of Effort" document submitted October 27, 2025.

The special education transportation expenditures included in Table 4 show relative stability in this area from 2008-09 through 2020-21, with a sharp increase seen in 2022-23 that again increased in 2023-24. This increase is not in alignment with the moderate increase to special education student population data seen in Figure 7, and, while out-of-district placements did increase (see Table 3), the percentage increase is not commensurate with the nearly 3 million dollar increase in transportation spending seen in 2022-23, meaning there is likely not one clearly identifiable cause of the increase, and addressing these costs will need to involve a multi-faceted approach to how special education transportation is decided on and supported by the district.

Figure 3. Special Education Transportation Costs by Year.



Source: "Evanston 65 Maintenance of Effort" document submitted October 27, 2025.

Special education transportation is decided by the IEP team based on the student's unique circumstances. The district shared a working document currently in development, "Procedural Guide for Equitable IEPs", that includes guidance language for district staff regarding special transportation. This guidance states,

> "Eligibility for special transportation is determined for students who have a disability that prevents them from traveling to or around school in a manner comparable to same-aged peers without disabilities. In order to be eligible, considerations need to be made about whether students have one or more of the following:
>
> - a physical or orthopedic condition
> - a chronic or persistent medical condition
> - an intellectual, sensory, communication, hearing, vision, or other condition
>
> The above considerations offer general guidance, though each student's unique circumstances should be discussed to determine whether the student has a disability that prevents them from traveling to or around school in a manner comparable to same-aged peers without disabilities."

Other than specific instructions to complete the appropriate components of the IEP paperwork to include special transportation, there does not appear to be other documents designed to support staff and/or IEP teams in determining if special transportation should be included in the student's IEP to provide them access to their specialized services.

Special Education and Student Outcome Data

The following tables and figures include data for Evanston-Skokie as well as identified peer districts to highlight how the data for Evanston-Skokie compares with other districts to build context around both historical and current factors affecting the district's special education program. The data focuses on different aspects of the districts' special education programs to identify trend data over the last 4 to 5 years.

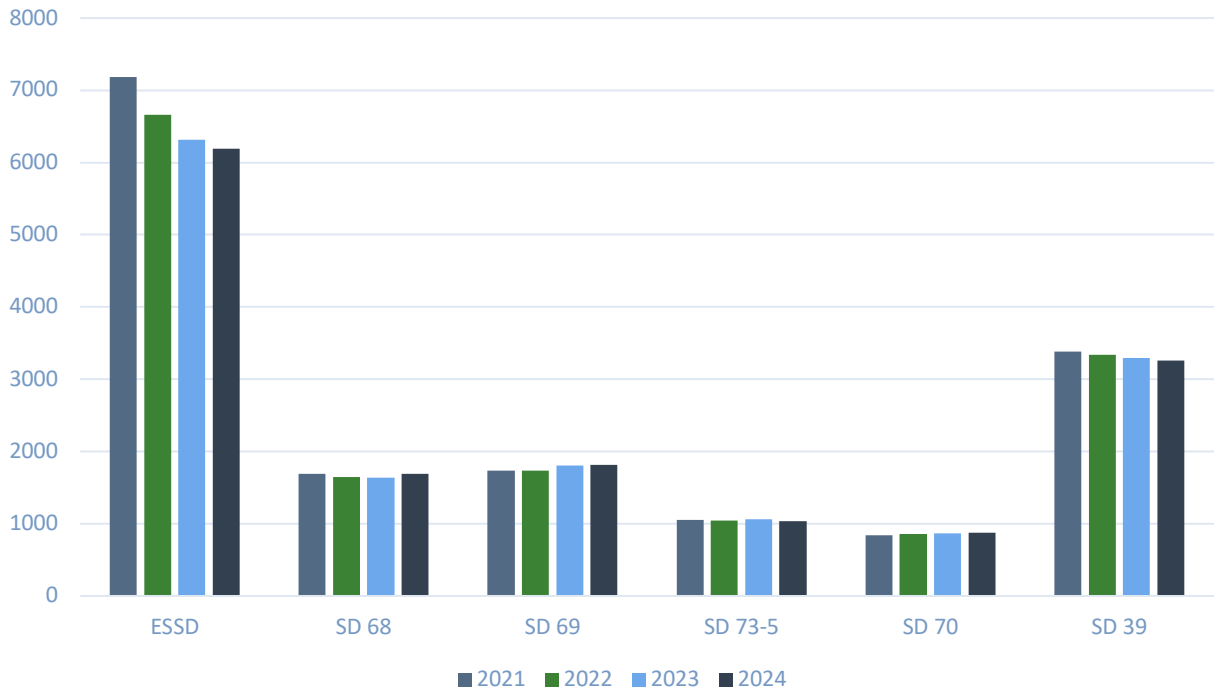
Table 5. Total Student Enrollment with Comparison Districts.

	2021	2022	2023	2024
ESSD	7181	6661	6316	6193
SD 68	1689	1645	1637	1694

SD 69	1737	1733	1802	1819
SD 73-5	1051	1044	1060	1039
SD 70	839	854	868	874
SD 39	3380	3342	3297	3257

Source: Illinois State Board of Education Report Card

Figure 4. Total Student Enrollment with Comparison Districts.



Source: Illinois State Board of Education Report Card

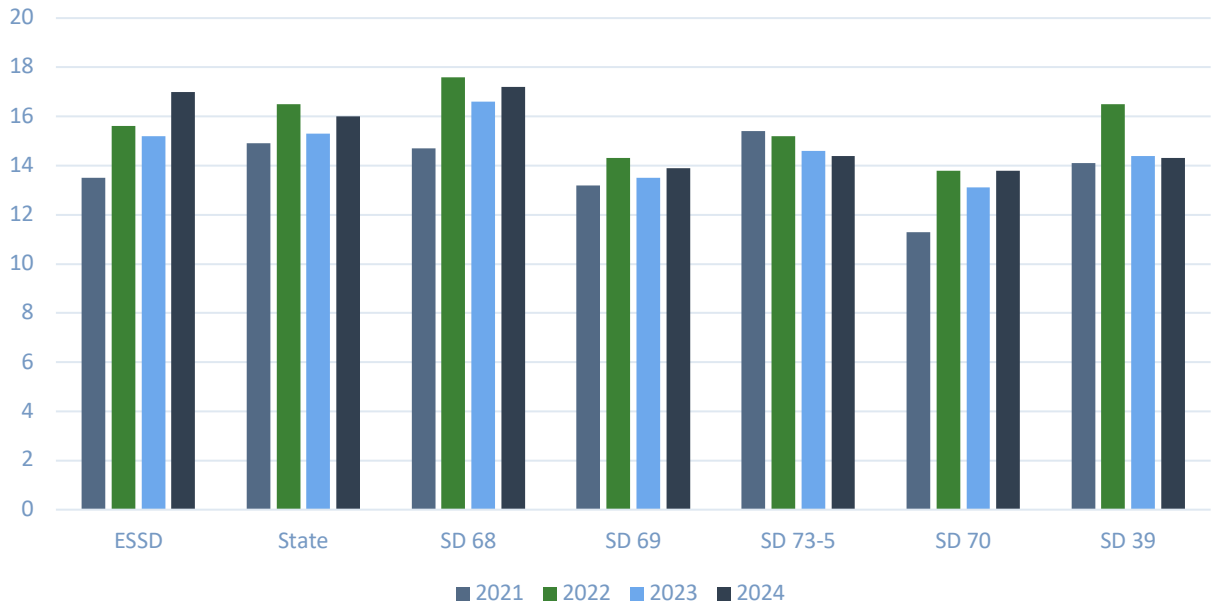
Table 6. Percentage of Students with Disabilities with Comparison Districts.

	2021	2022	2023	2024
ESSD	13.5	15.6	15.2	17

State	14.9	16.5	15.3	16
SD 68	14.7	17.6	16.6	17.2
SD 69	13.2	14.3	13.5	13.9
SD 73-5	15.4	15.2	14.6	14.4
SD 70	11.3	13.8	13.1	13.8
SD 39	14.1	16.5	14.4	14.3

Source: Illinois State Board of Education Report Card

Figure 5. Percentage of Students with Disabilities with Comparison Districts.

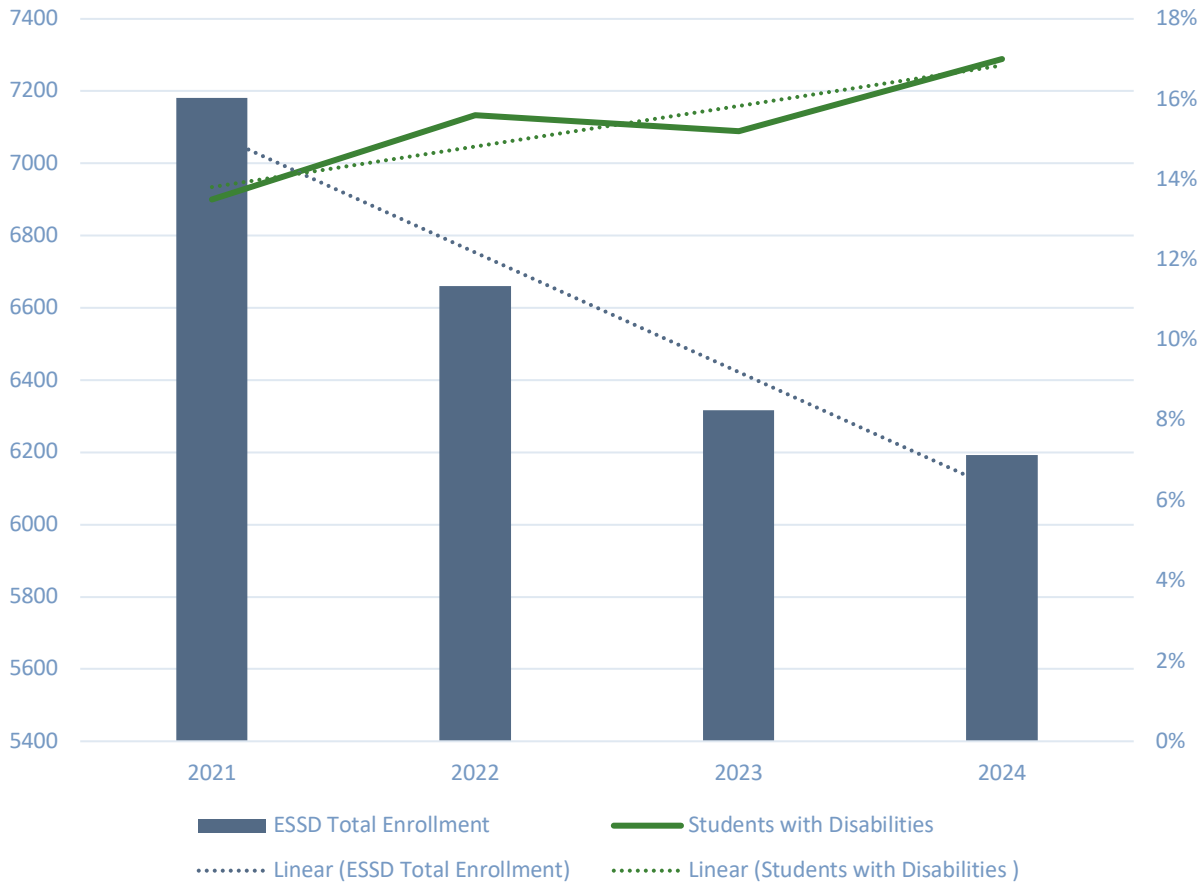


Source: Illinois State Board of Education Report Card

Figure 5 illustrates the percentage of students with disabilities as part of the total district enrollment. Over the four years shown, ESSD had the second-highest percentage at 17%, ahead of only SD 68 with 17.2%. In contrast, SDs 69, 73, and 35 fell below 13%. While a rate of 17% of total enrollment identified as students with disabilities is just above the state average of 16%.

As of the 2022-23 school year, the national average for students aged 3-21 receiving special education services is 15.2%. This average temporarily decreased by one percent during the COVID-19 years (2019-2021) but rebounded with a three-percent increase in 2022-23, reaching an all-time high[1]. This would place ESSD again just slightly above the state and national average for identifying students with disabilities. When combined with the declining enrollment, the increase in identification can signal a concern of overidentification and is a data point to be analyzed annually.

Figure 6. Total Student Enrollment and Percentage of Students with Disabilities by Year.



Source: Illinois State Board of Education Report Card

1 National Center for Education Statistics, 2024

Table 7. Percentage of Students Across Disability Categories in Comparison to the State.

	2021		2022		2023		2024	
	ESSD	State	ESSD	State	ESSD	State	ESSD	State
Autism	10.2	10	9.2	10.5	9.2	11.3	9.8	12.2
Developmental Disability	17.7	13.3	18.8	13.5	20.6	13.8	22.6	14.4
Emotional Disturbance	6.7	6.2	6.8	6.2	4.3	5.4	5.2	5.1
Intellectual Disability	2.6	4.9	2.5	4.9	2.3	4.6	1.5	4.4
Specific Learning Disability	21.8	33.5	20.9	33.5	27.7	32.3	27.6	31.4
Other Health Impairment	12.1	13.6	11.9	13.6	9.8	13.8	11.1	13.7
Speech and Language Impairment	26.3	15.7	27.8	15.7	23.7	16.2	18.9	16.3

Source: Illinois State Board of Education Report Card

Least Restrictive Environment (LRE) data is based on the percentage of students with disabilities who spend at least 80% of their day with non-disabled peers. LRE is an IDEA principle that requires students with disabilities to be educated with their nondisabled peers to the maximum extent appropriate. Removal from general education settings should occur only when education in regular classes cannot be achieved satisfactorily, even with supplementary aids and services.

Key Components of LRE:

- Individual, not programmatic.
  - The IEP team decides placement based on the student's needs, not disability label, schedule convenience, or staffing patterns.
- Continuum of placements.

  - From general education with supports, co-teaching/resource, special class, special school, or home/hospital districts must make this full continuum available.
- Use supports first.
  - Consider and document supplementary aids/services before moving to a more restrictive setting.
- Harmful effects.
  - Teams should weigh potential negative effects on the student and on others when deciding.
- Nonacademic inclusion matters.
  - LRE applies to lunch, recess, clubs, athletics, transportation, and field trips, not just academics.
- Review & document.
  - Placement is reviewed at least annually during IEP meetings, written in the IEP, and tied to the student's goals and services.

In reviewing and comparing ESSD's LRE data in Table 8, the district has a higher percentage than peer districts and the state average, indicating more students in settings with non-disabled peers throughout the day, which is commensurate with the district's focus on inclusionary practices. This is a data point that should be reviewed and analyzed regularly with additional focus on efforts to evaluate inclusion practices within the district.

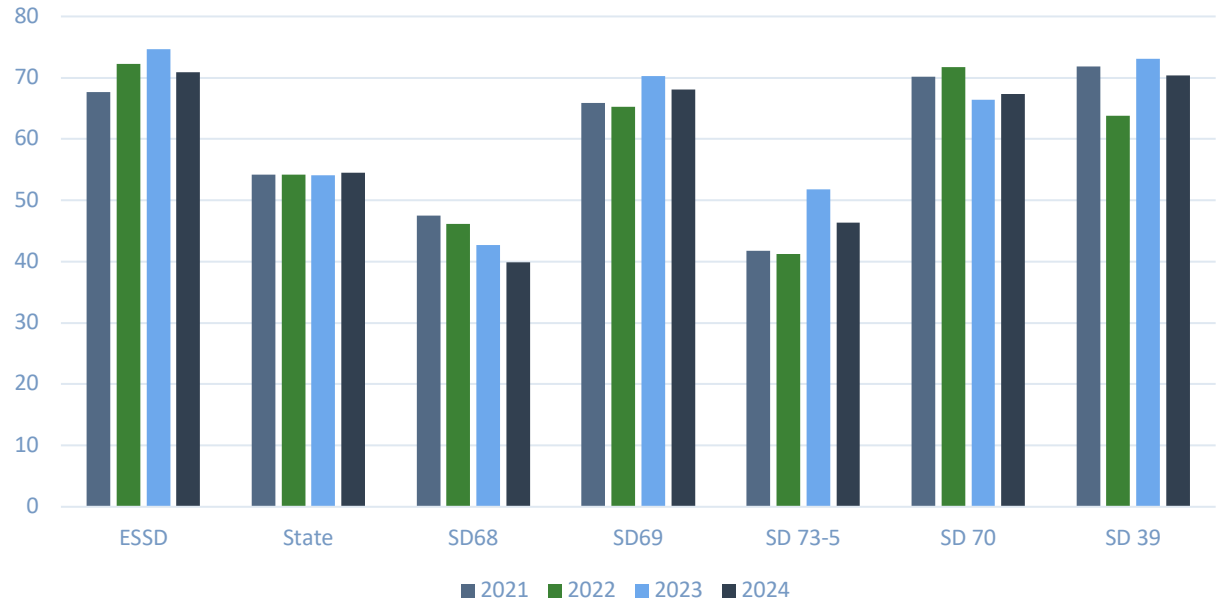
Table 8. Least Restrictive Environment Comparison Data.

	2021	2022	2023	2024
ESSD	67.7	72.3	74.7	70.9
State	54.2	54.2	54.1	54.5
SD 68	47.5	46.2	42.7	39.9
SD 69	65.9	65.3	70.3	68.1
SD 73-5	41.8	41.2	51.8	46.4
SD 70	70.2	71.7	66.4	67.3

SD 39	71.8	63.8	73.1	70.4

Source: Illinois State Board of Education Report Card

Figure 7. Least Restrictive Environment Comparison Data.



Source: Illinois State Board of Education Report Card

Table 9. ESSD Student Outcome Data 2019-2024.

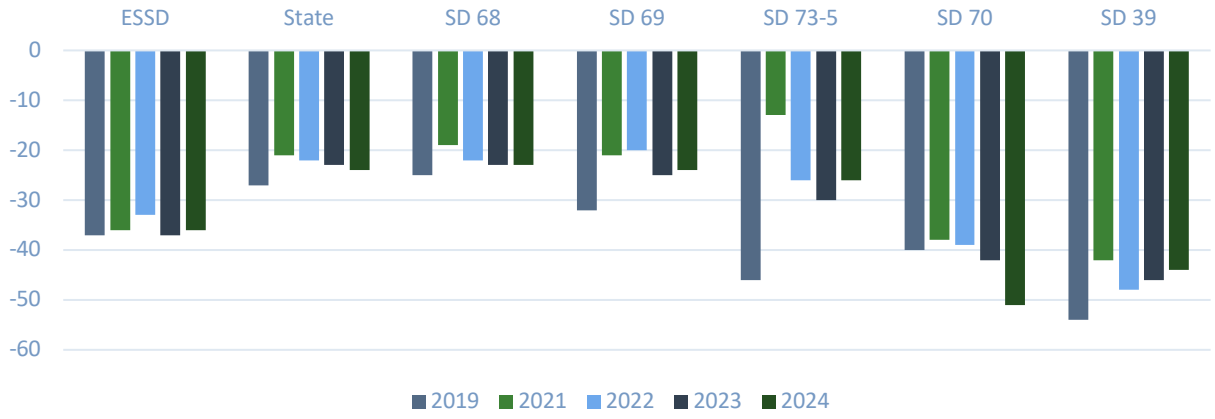
	2019	2021	2022	2023	2024
ELA					
ESSD	-39	-34	-35	-42	-45
State	-34	-28	-28	-32	-36
SD 68	-28	-23	-25	-29	-28
SD 69	-34	-21	-22	-25	-29

SD 73-5	-52	-33	-41	-36	-53
SD 70	-37	-50	-41	-48	-51
SD 39	-57	-47	-48	-49	-47

Math					
ESSD	-37	-36	-33	-37	-36
State	-27	-21	-22	-23	-24
SD 68	-25	-19	-22	-23	-23
SD 69	-32	-21	-20	-25	-24
SD 73-5	-46	-13	-26	-30	-26
SD 70	-40	-38	-39	-42	-51
SD 39	-54	-42	-48	-46	-44

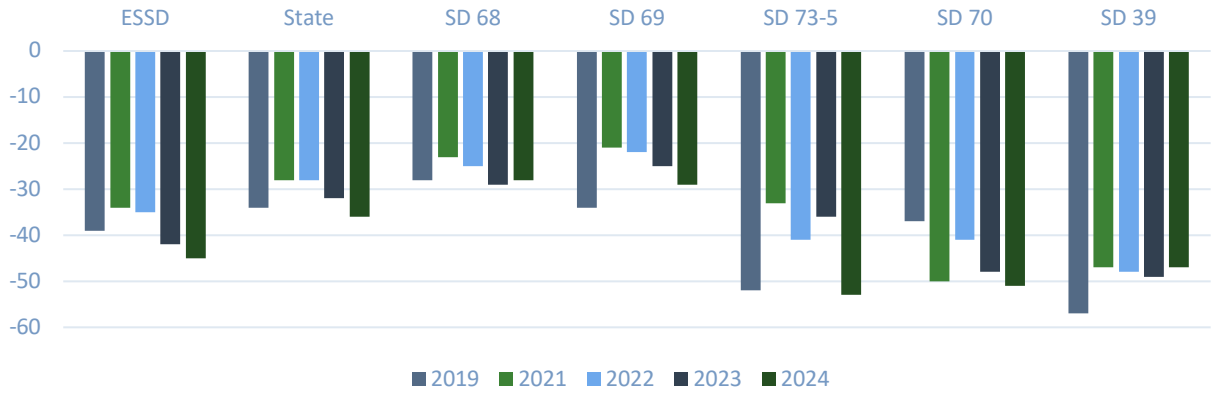
Source: Illinois State Board of Education Report Card

Figure 8. Math Achievement Gap Data (persistent academic performance difference between IEP and non-IEP students).



Source: Illinois State Board of Education Report Card

Figure 9. English/Language Arts Achievement Gap Data (persistent academic performance difference between IEP and non-IEP students).



Source: Illinois State Board of Education Report Card

Figures 8 and 9 detail the Math and English Language Arts academic achievement gap data between IEP and non-IEP students. The performance gap has shown little to no improvement over the last 4 years for ESSD. This can be attributed to a number of things, such as lack of exposure to grade level, rigorous instruction, tiered instruction and intervention, lack of specially designed instruction, or slow growth on goals. This achievement gap was also noted in the 2019-2020 WestEd review. A regular data-based study into individual student data, instruction, and outcomes would support identifying causation.

Staff Survey

A staff survey was administered by ESSD special education leadership to gather additional feedback on service options, perceived appropriateness of student placements, scheduling, including the potential of more group-based services, opinions regarding the cost-effectiveness of programs, and potential improvements to those programs. The survey was completed by 126 staff members from November 2024 through January 2025. Staff were prompted to indicate their role and school name but were not asked to provide their name. It should be noted that there is no representation from general education included in the survey. The roles of staff who participated in the survey include:

- IES Educator
- Administrator
- Related Service Provider
- School Psychologist
- STEP

Across different school sites and roles, there were several consistent themes to note that provide additional insight into staff perceptions across the district.

Continuum of Service Options: Many respondents indicate there are gaps in the range of special education services offered in the district. While it was acknowledged that there were programs such as STEP, RISE, and others, it was noted frequently that the absence of cross-categorical classrooms, or self-contained classrooms, within the schools is limiting. There were requests to bring cross-categorical classrooms back, referencing a decision by the district to remove those classrooms several years ago, to provide a full continuum of service options to the district to meet varying student needs.

Effectiveness of Special Education Placements: In general, it was reported that special education placements are effective, but, aligned with comments regarding the gap in the continuum of service options, comments were present about not all students' needs being met by what is available in the district. Additionally, students who are in general education settings may not always have the support they need provided in those settings to be successful.

Scheduling and Group-Based Services: Inefficiencies in scheduling and service delivery were noted, particularly a lack of coordination and concerns around caseloads. There was mixed support for group-based service delivery with an acknowledgement that it could improve efficiency, but there could be an impact on the service provider's ability to provide more individualized attention when needed.

Budget Management: Concerns about budget management and the overall impact of financial decisions on the quality of the overall special education system were noted. Regarding the cost-

effectiveness of the current model of special education in the district, some respondents felt it is cost-effective, while others noted there was room for improvement through looking at adjusting administrative roles, service delivery models, student outplacements, and staffing allocations.

Data Collection: Improvement to the current systems in place to collect and manage both data for special education, as well as regarding interventions through MTSS, was noted by respondents. Streamlined, clear processes and expectations being developed, communicated, and implemented were requested, while also suggesting support for onboarding staff when hired in these areas, as well as revisiting these processes regularly for all staff.

It was highlighted that better systems of data collection and streamlined processes could improve student outcomes, reduce evaluations, ensure appropriate placement of students, and reduce paperwork processes for staff, which was also reported as sometimes being inconsistent and redundant.

Staff Engagement and Morale: Teachers and service providers report workload concerns and call for additional administrator presence and input at the classroom level to promote an understanding of student and staff needs. Responses to this survey indicate ESSD has a special education staff with a lot of insight and suggestions for how to improve systems across the district.

Multi-Tiered Systems of Support: Streamlining and improving data systems throughout the district was a theme throughout the survey, including regarding pre-referral intervention activities. There were concerns about inconsistent implementation across the district from school site to school site, as well as a general perception that MTSS is not functioning effectively as a cohesive system, leading to increased requests for special education referrals.

Overall, the survey responses collectively highlight a need for strategic enhancements in program offerings, systems, processes around data collection and use, administrative engagement, and processes to improve streamlining and efficiency to improve special education services in the district.

Fiscal Review and Maintenance of Effort Analysis

Understanding how changes in spending must be evaluated under the IDEA MOE requirements is essential for effective planning and ensuring compliance with federal fiscal guidelines. This section provides an overview of the MOE requirements, a summary and analysis of the submitted MOE data from the district, with recommendations and resources to improve practices and utilize MOE data to inform future budget discussions and planning included at the end of the report.

Local Education Agency (LEA) MOE Overview

MOE is a federal requirement under IDEA that ensures that LEAs provide consistent funding levels and supplement, not supplant, federal IDEA Part B funds. LEAs receiving IDEA Part B funds are required to both budget (eligibility standard) and spend (compliance standard) local, or state and local, funds for special education and related services year to year (34 CFR 300.203).

For both the eligibility and compliance standards, LEAs can determine compliance using four different methods: total local funds, total state and local funds, per capita local funds, and per capita state and local funds. LEAs are required to compare the budget for the upcoming year and expenditures from the most recent year for which information is available to the last year the LEA passed MOE. LEAs are required to budget and spend at least as much as they did in the most recent year they met MOE requirements, which sets the MOE threshold. LEAs are required to pass only one of the four methods to comply with the MOE requirement, making tracking of MOE data year to year critical.

LEAs may reduce their MOE budget and expenditures for special education and related services under certain circumstances. IDEA Part B regulation (34 CFR 300.204) provides five exceptions that allow an LEA to reduce MOE budget and expenditures below the applicable MOE threshold. These exceptions include:

- A voluntary or for cause departure of special education staff
- A decrease in enrollment of children receiving special education and related services
- The termination of an exceptionally costly program for a particular child, under certain circumstances
- The termination of a costly expenditure for long-term purchases
- The assumption of cost by the State Education Agency's (SEA) high-cost fund, if applicable

Additionally, if the district receives an increase in IDEA Part B Section 611 grant funds, it is allowed to reduce its MOE expenditures level by up to 50 percent of the increase for Section 611 funds (34 CFR §300.205(a)).

Consequences for not meeting the MOE eligibility and/or compliance standards are significant. LEAs are not eligible to receive IDEA Part B funds until they have met the eligibility standard, shown by budgeting at least the same or more than the last year the LEA met the MOE compliance test. If an LEA fails the compliance standard, the SEA may require them to repay the funds using non-federal funds in the amount of the failure or the LEA's Part B grant amount, whichever is lower.

For additional information about LEA MOE, resources from the Center for IDEA Fiscal Reporting (CIFR) are included in the resources section of this report. While these resources are developed for SEAs, the information and tools for LEA MOE are also applicable to LEAs. Additionally, the Illinois State Board of Education posts resources as well as the documents required for reporting on their website (Illinois State Board of Education IDEA Part B Grant FY 25 Maintenance of Effort).

MOE Data Analysis

This review included an analysis of current practices, procedures, and data relevant to MOE compliance for ESSD. Through the review, the team considered the following questions in addition to looking at the more detailed MOE data and district practices:

- Does the district have internal procedures to ensure that special education budgeting and spending are aligned with MOE requirements, including the tracking of all special education funds?
- Are there any notable trends or concerns in the MOE data that the district should review or investigate further?
- Are there practices in place to track and monitor potential available exceptions to reduce the MOE budget and expenditures threshold?
- How are MOE requirements considered during budgeting discussions?

The project team reviewed the following MOE-related documents provided by the district:

- Historical MOE tracking (2008-09 through 2023-24)
- A copy of the MOE reporting worksheet provided by the SEA
- Select Expenditure Reports for 2024-25
- Annual Financial Reports for FYs 2021-24

Additionally, interviews took place to obtain further information from the school district team around current practices, procedures, and any concerns regarding MOE, and its implications for funding decision-making.

Table 10, below, shows district special expenditures by year for both federal and state and local funds, with Figure 10 representing this data visually.

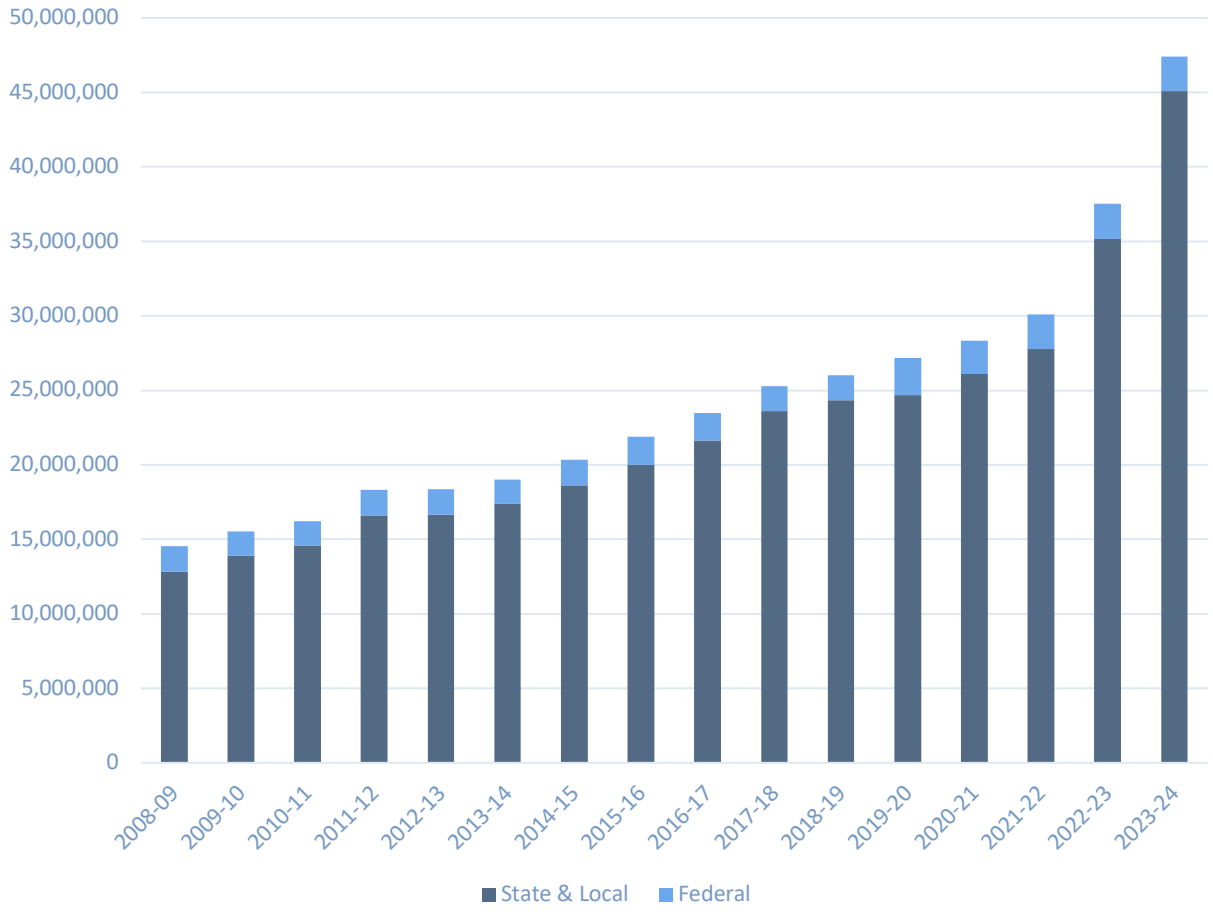
Table 10. District Reported Special Education Expenditures by Year

Year	State & Local Expenditures	Federal Expenditures
2008-09	$12,827,224	$1,733,951
2009-10	$13,907,977	$1,633,355
2010-11	$14,606,581	$1,626,126
2011-12	$16,617,065	$1,708,154
2012-13	$16,635,304	$1,733,853
2013-14	$17,384,698	$1,612,902
2014-15	$18,616,487	$1,742,967
2015-16	$19,988,966	$1,907,635
2016-17	$21,635,597	$1,832,555
2017-18	$23,592,895	$1,672,863
2018-19	$24,341,333	$1,678,324
2019-20	$24,661,703	$2,490,616
2020-21	$26,119,597	$2,208,316

2021-22	$27,794,821	$2,303,708
2022-23	$35,156,914	$2,356,102
2023-24	$45,085,583	$2,327,613

Source: "Evanston 65 Maintenance of Effort" document submitted October 27, 2025.

Figure 10. District Reported Special Education Expenditures by Year.



Source: "Evanston 65 Maintenance of Effort" document submitted October 27, 2025.

This data shows a steady increase in expenditures from the 2008-09 school year, with a sharper increase starting in 2022-23.

Table 11. Special Education Student Count Per Pupil Spending 2020 versus 2024 with Comparison Districts.

	2020		2024	
	Student Count	**Per Student Expenditures**	**Student Count**	**Per Student Expenditures**
Evanston-Skokie	1102	$8,185	1061	$17,300
Arlington Heights	865	$10,463	788	$15,054
Glenview 34	723	$15,726	524	$25,989
North Shore 112	704	$9,232	741	$10,119
Wilmette 39	653	$10,721	633	$14,603

Source: ISBE 2024 Special Education Expenditures and Receipts Report and 2020 WestEd Special Education Review Final Report

Table 11 above shows the special education student count and per pupil expenditures for ESSD as well as the comparison districts included in the 2020 WestEd Special Education Review report. This table has been extended to show the same comparison districts used in 2020, with updated information available for 2024. This increase in per-pupil expenditures is commensurate with the increases starting in the 2022-23 reporting year.

Tables 10 and 11 and Figure 10 show that the yearly special education expenditures have increased since 2008-09. Years 2022-23 and 2023-24 are bolded in Table 10 to bring additional attention to the increases reported during those two years, which are significant in comparison to all prior reported years.

Table 12. District Reported Increase in Special Education Expenditures by Year

Year	Increase in Expenditures from Prior Year
2008-09	$391,826

2009-10	$1,080,753
2010-11	$698,604
2011-12	$2,010,484
2012-13	$18,239
2013-14	$749,394
2014-15	$1,231,789
2015-16	$1,372,479
2016-17	$1,646,631
2017-18	$1,957,298
2018-19	$748,438
2019-20	$230,370
2020-21	$1,457,894
2021-22	$1,675,224
2022-23	**$7,362,093**
2023-24	**$9,928,669**

Source: "Evanston 65 Maintenance of Effort" document submitted October 27, 2025.

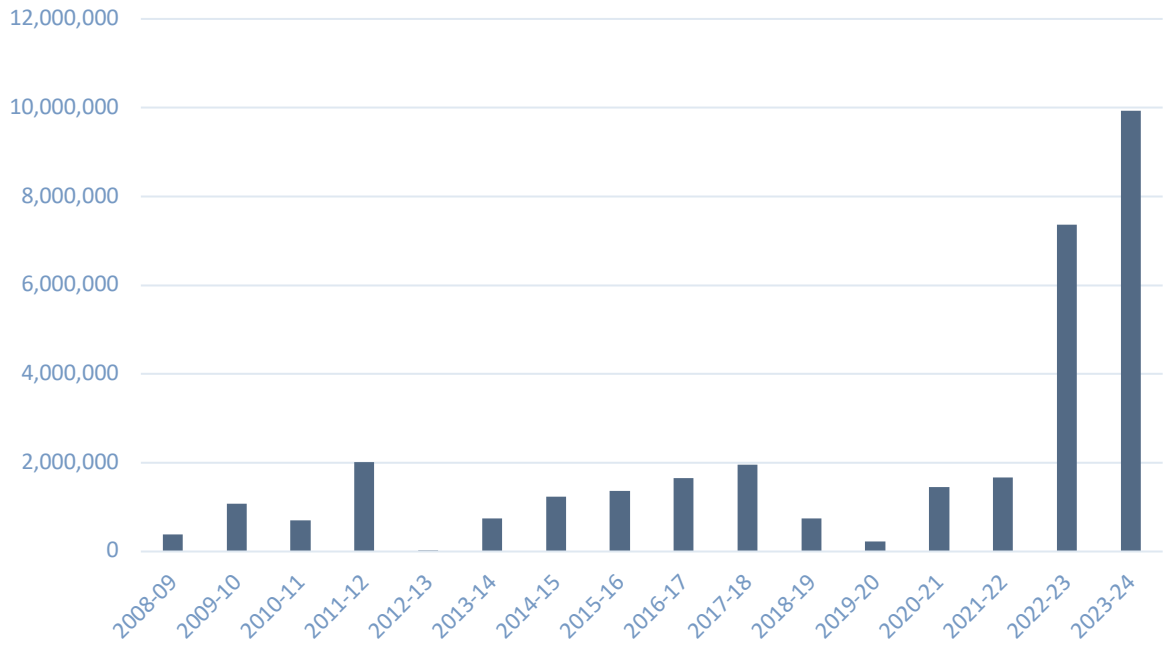
Again, of note are years 2022-23 and 2023-24, represented visually in Figure 11 below. While all prior years complied with MOE requirements for spending, none exceeded 2 million additional dollars spent in comparison to the prior year, while 2022-23 and 2023-24 saw increases of $7,362,093 and $9,928,669, respectively. This is important to note because when there is an

increase in spending, this also increases the MOE threshold and future years' spending obligations, unless the district qualifies for one of the allowable MOE exceptions or reductions.

Looking at the more detailed report reveals other notable increases in expenditures. From 2020-21 to 2021-22, special education transportation costs doubled, going from 1.8 million to 3.4 million. This was followed by an additional increase from 2021-22 to 2022-23 from 3.4 million to 6.1 million. Additionally, instruction expenses increased by roughly 7 million dollars from 2022-23 to 2023-24.

Over the past five years, the growth in the number of special education students has been relatively modest; however, expenditures have increased at a faster rate, suggesting that spending was rising at a faster rate.

Figure 11. District Reported Increase in Special Education Expenditures by Year.



Source: "Evanston 65 Maintenance of Effort" document submitted October 27, 2025.

Summary of the MOE Analysis & Key Discoveries

Historical MOE Compliance and Tracking

A review of the historical tracking document shows that the district has tracked expenditures and federal revenue to calculate MOE both for total costs and per capita. While this tracking does not break down and separate local from state and local totals and per capita amounts, it does align with the reporting document provided by the SEA.

- The tracking does not indicate whether MOE is being met or not met and by which method, but an analysis of the data shows that the district met MOE annually, and it does not appear that the district has not needed to use allowable exceptions in order to meet MOE.
- There is a notable increase in expenditures in 2022-23 and again in 2023-24 that does not appear to align with an increase in students receiving special education services.
- There was no reported process for proactively tracking potential exceptions to be taken for MOE, if needed.

Voluntary Coordinated Early Intervening Services (CEIS)

LEA staff reported that the district is participating in voluntary CEIS, which allows LEAs to reserve up to 15% of federal IDEA section 611 and 619 funds for CEIS activities (34 CFR 300.226). These funds were reported as currently being used to support general education activities, namely, implementation of MTSS, which is an allowable use of those funds.

When looking at overall special education spending as a district, it is important to consider that a percentage of the federal IDEA funds are being used for general education intervention and to determine year-to-year if this use of IDEA funds meets district priorities or if there is other funding available for these activities that could free up federal IDEA funds for special education costs in the district.

District MOE Processes and Procedures

This area is the most notable part of the review and offers the greatest opportunity for the district to improve its practices to handle future fiscal changes affecting MOE compliance and special education decisions more effectively.

It is important to report that the project team initially requested current and historical MOE data for the district in June 2025, and it was reported by district staff that this information was not tracked within the district and was not available for review. Additionally, staff reported that they reached out to ISBE to obtain MOE documents and were unsuccessful. The district's MOE reporting data was later located and provided to the review team in October 2025, which revealed that MOE has been tracked within the district since 2008, with current reporting being completed by a district grants manager. This highlights two things: first, MOE appears to be viewed primarily as a reporting requirement, and its data or possible exceptions are not included in budget planning or ongoing monitoring by the fiscal and program teams; second, there are no clear procedures in place around MOE to define roles, responsibilities, or how MOE data should be used.

- Collaboration and communication between the program, business office, and the individual completing the MOE report seem to be lacking. For example, key staff within the district did not have access to the MOE reports or know where to go to get access

and contacted the state for copies even though the reports were already available in the district.

- Interviews revealed a lack of communication across departments within the district, with each individual or department doing "their part" but not necessarily communicating or understanding the global impacts or monitoring special education spending throughout the year.
- For example, when asked about the process for requesting an additional special education staff member, district staff explained that the request goes to human resources, who then informs the fiscal department of salary information once someone is hired. The fiscal department was unsure if the budget is routinely reviewed in this process and noted that communication about the budget typically occurs through reports distributed throughout the year. This suggests an opportunity to clarify processes and strengthen the district's comprehensive approach to special education spending.

Conclusion and Recommendations

The information gathered through this review provides additional data and insight that can be used by the Evanston-Skokie School District to continue to build upon established practices to meet the unique needs of the students in the district. These recommendations are based on the data and information shared with the WestEd team and address each area reviewed, providing considerations that could address efficiencies and improved practices throughout the district. It is important to note that there were no concerns regarding shared policies, procedures, or practices not aligning with IDEA statute and associated regulations, and that the following recommendations can be considered as ways to enhance the program and practices already in place in the district.

Additionally, it is crucial to preface that any changes to special education and related services for students within the district would need to occur within and be informed by the team established for the students' IEP. Decisions made through the IEP development process, including services, programs, and placement, should drive districtwide decision-making regarding staffing and program options. The recommendations that follow look to strengthen processes that are aligned with the IEP processes already in place, as established by the IDEA.

Current Model of Special Education

- ESSD should explore expanding the continuum of options available to address the needs of students who are currently placed in out-of-district programs or who may need different support or services in order to make progress in the least restrictive environment, as required by IDEA. Any addition to what the district is currently offering should be considered through the use of data and done in a way that is strategic to limit commitment to significant changes before determining effectiveness. If changes were to occur, determining what data should be collected to determine effectiveness and regularly meeting to look at the data and make changes, if necessary, would be recommended. Ensuring there is a continuum of service options that is effective and meets the needs of students supports being able to have students stay in the district, which in turn may also impact transportation costs as well as the need for paraprofessionals.
- Continue to focus on strengthening MTSS consistency in implementation across the district through a comprehensive self-assessment and needs analysis. MTSS is much more than tiered interventions and requires districts to also examine their system from multiple levels of communication, shared responsibility and decision-making, data literacy, problem-solving, and effective instruction. Once the district has analyzed its current system, an action plan can be built that will enhance the structures already in place and working as well as work to remove barriers to improving student outcomes.
- Develop a comprehensive manual that includes necessary forms, compliance checklists, and guidance documents for IEP teams. The special education team has already developed many guidance documents that are comprehensive and provide important information to staff in the district. Compiling these into one manual that also includes statute and regulatory language at the federal level, as well as any state-specific law, will provide clarity and support with the establishment of consistent practices and procedures that can then be checked for fidelity of implementation.
- Section 504 plan case management responsibilities can be shifted if it would help address workloads/caseloads for staff who are currently overseeing these plans and their implementation. These are general education plans that do not require a special education teacher or related service provider to manage.

Special Education Staffing

- Whenever possible, make efforts to shift from the use of contracted servicers for related service providers to hiring district staff. Consider developing internal policies and procedures for when the use of an outside agency can be considered.
- If there is flexibility within the contracts for services, prioritize ending contracts as district-hired staff becomes available (when students move out of the district, no

longer require services, etc.), when it feels appropriate. This could also mean that for some time, there would be an overlap in service time to shift from a contracted staff member to a district-hired staff to support a smooth transition for the student and staff.

- Develop and implement strong procedures regarding paraprofessionals, including guidance for teams on adding, fading, and removing this support. Also, look to make sure paraprofessionals in place due to student behavior have a behavioral intervention plan in use, and that they are taking data and working toward an IEP goal that is measurable to help inform IEP teams on this service.
- Consider additional training for paraprofessionals, including exploring the development of Registered Behavioral Technicians (RBTs) in the district who would have a higher level of training and supervision. These staff could support the specialized classrooms as well as students with higher levels of behavior and would allow for upward movement and opportunity within the district for paraprofessional staff, which has the potential to support with retention.
- Consider hiring a behaviorist in the district rather than contracting for one only when needed. This staff could support training across the district, provide classroom management strategies, develop behavior plans, monitor fidelity of implementation, provide support to paraprofessionals, and support behavioral systems for specialized programs.
- For staffing, consider that special education staffing resists a simple formula because it is fundamentally IEP-driven and therefore varies with the unique mix of student needs at any given school. Two classrooms with the same number of students can demand vastly different staffing depending on service minutes, LRE placements (co-taught, resource, self-contained), related services (SLP, OT, PT, vision/hearing, behavior), acuity (medical, mobility, communication), language access (interpreters, bilingual providers), and scheduling realities (inclusion across multiple periods, transportation, therapies delivered during electives). Legal timelines (evaluations, IEPs, progress reporting), caseload composition (number of goals, direct vs. consult minutes), and program configuration further are additional considerations for staff workload. Sustainable staffing should be needs-based and dynamic, informed by current IEPs and schedules rather than fixed by a districtwide formula. Ongoing collaboration and analysis between site and district-level personnel is important in determining accurate staffing levels both while budgeting and determining staffing levels for the new year as well as ongoing as needs shift.

Out-of-district Placements

- The Manager of Student Specialized Services monitors the district out placements and has a strong understanding of the current needs of students currently outplaced. By leveraging this knowledge while discussing the development of district programs to build upon the current continuum of options, the district has the opportunity to develop supports that would help with students returning to a less restrictive environment. Additionally, the Manager of Student Specialized Services knows the current programs students are placed in and what is working well in those programs to support students. Using that knowledge to incorporate strategies and systems into programs within the district may help to improve the current programs and support with transition back to district classrooms.
- Continue to ensure that all available reimbursements for out-of-district placements and transportation costs that the district is eligible to apply for are requested. Having procedures in place for fiscal staff to know what funds are requested, the process for requesting reimbursement, the information needed from the program team, and the timelines could be helpful to ensure consistency year to year.

Special Education Transportation

- Develop comprehensive special education transportation guidelines to support teams with determining if specialized transportation should be included in the student's IEP, which includes considerations for the IEP team as well as inclusion of the basic concept of the least restrictive environment. While there is some guidance available in the drafted "Procedural Guide for Equitable IEPs", additional guidance may be helpful to support teams in discussing the factors that should be considered for specialized transportation versus accommodations or supports that could be provided to support a student being transported with their general education peers. These guidelines should be in line with and supported by the "Transportation for Students with Disabilities and Special Health Care Needs" document developed by ISBE.
- Training for IES coordinators, administrators, and special educators on the guidelines for adding special education transportation, as well as calibrating to ensure there is a common understanding of when that service should be added, can support consistency across the district.
- Similar to the recommendation regarding contracted service providers, the district should look at opportunities to bring outsourced transportation services back to the district, when possible, to alleviate costs associated with outside agencies.
- Additionally, out-of-district placements will correlate directly with increased transportation costs, as students will require transportation to access their school

placement. Addressing the programmatic needs of the district to support students within the district should also see a reduction in transportation needs and costs.

Staff Survey

- Engagement in the staff survey shows a staff that is insightful and open to providing feedback to improve systems within the district. Survey results also indicated there is interest in more engagement with district administration, so they feel their needs are understood and considered. With new special education leadership hired this school year, this is a great opportunity to focus on increased presence and engagement across school sites and classrooms and to prioritize listening and learning about perspectives, needs, and suggestions across the staff.
- General education staff do not appear to have been included in the survey and may have insight that can be provided regarding the special education program, inclusion and co-teaching practices in the district, MTSS, and how they can be best supported in working with students with diverse needs. The district may want to consider developing and administering an additional survey to general education staff and site administrators to gather additional information.

Student Data and Outcomes

- To more accurately identify and respond to the needs of the special education department, the district and school teams should consider establishing a regular cycle of data-based decision-making. Using a common calendar and protocols, teams can review core instruction, access to services, IEP progress, and early-warning indicators; interpret patterns and equity gaps; and translate findings into time-bound action steps with owners and follow-up checks.
- The tables in the Appendix outline a sample cadence of monthly, quarterly, tri-annual, and annual data meetings, including what to review, who participates, and the decisions each meeting should drive to ensure that data lead to concrete improvements in student outcomes.

Fiscal and Maintenance of Effort

- Coding of special expenditures within the financial management system should be monitored regularly, at least annually, to ensure that there is consistency across years and that only allowable special education expenditures are included.
- A deeper analysis of the increase in instructional and transportation costs to determine if there is a correlation with an increase in students requiring a higher level of service.

This would also provide important information regarding potential MOE exceptions that the LEA can take if the students either graduate or have a change in the district's offer of free and appropriate public education (FAPE) to a less costly program.

- Additionally, developing an internal document to outline what costs should be coded to special education would benefit the district by ensuring consistency year to year and across staff. ISBE includes an Annual Finance Report (AFR) Reference Sheet that includes what should be included in MOE expenditures on their website, which can be used as a guide and referenced in any procedures or documents the district develops regarding MOE. The fiscal department only provided detailed expenditure reports for the 2023-24 fiscal year, so a year-to-year comparison analysis was not completed through this review. Based on an analysis of the data that was provided, there are no clear indications that unallowable expenditures, such as general education teacher salaries and benefits, were included.
- A system of communication and collaboration between the program and fiscal teams and the individual reporting on MOE annually needs to be established. Typically, business offices are very involved in monitoring and tracking special education expenditures with an awareness of the impact on maintenance of effort, as this has significant implications for district spending requirements for special education.
- Cross-departmental training should occur to ensure that everyone has a clear understanding of the MOE requirements and individual responsibilities for communication, tracking, and reporting within the district. The district should also consider setting up regular opportunities for the special education director to meet with the fiscal department to discuss the budget, anticipated increases in expenses, and changes that could impact both the district's anticipated special education spending as well as MOE in a proactive way.
- Along with this training, clear procedures should be developed that outline the process for budget development, requests, and communication regarding anticipated increases to the budget and possible exceptions. Having clear procedures and roles identified will ensure that special education expenditures are in alignment with MOE requirements and are clear to those who should be involved in monitoring spending within the district.
- A process for tracking yearly MOE expenditures, possible exceptions, and reduction should be developed and maintained by the district. While the district has historically met MOE without exceptions, should expenditures be reduced, the district will want to consider and take all available exceptions to meet the MOE requirement and lower its threshold for spending in future years.
- The Center for IDEA Fiscal Compliance (CIFR) has developed an MOE calculator tool (linked in the resources below) that can be used by LEAs to track and calculate MOE requirements and exceptions. The district may want to consider using this more

detailed tool to track expenses, adjustments to MOE, and exceptions. Additionally, this tool allows for tracking of funds covering all four methods of MOE calculation (local total, state and local total, local per capita, and state and local per capita). The current tracking sheet used by the district appears to only track state and local total and state and local per capita. Tracking all four methods allows for additional opportunities to pass MOE with evidence to share with the SEA.

- When discussing any potential special education budget cuts, the district should carefully consider the impact of failing to meet MOE requirements, as this could negatively impact eligibility for IDEA Part B federal grants. It is important to assess MOE impact when making budget reductions to ensure continued access to critical federal support for special education services.

Resources

California Transition Alliance. (2020). *Secondary Transition Planning: The Basics*. Found at: https://www.cde.ca.gov/sp/se/st/index.asp.

ISBE Special Education Expenditure Receipts Report 2024

NTACT:C (2018). *Indicator 13 Checklist: Frequently Asked Questions and Responses*. Found at: https://transitionta.org/indicator-13-faqs/

NTACT:C (2025). *Indicator 13 Checklist Form A.* Found at: https://transitionta.org/i13-checklists/?h=indicator%2013%20checklist

Locked Out: Improving Educational and Vocational Outcomes for Incarcerated Youth

US Department of Education Dear Colleague Letter Regarding Students with Disabilities Who are Incarcerated

Fiscal and MOE

Applying Exceptions to IDEA Local Educational Agency Maintenance of Effort

Calculating Local Educational Agency Maintenance of Effort Adjustment and Use of Freed-Up Funds

Illinois State Board of Education IDEA Part B Grant FY 25 Maintenance of Effort

Letter to Carol Honkenson (Includes a response from OSEP about MOE and improved efficiency in special education transportation costs)

Letter to Lovato (includes a response from OSEP about MOE and replacing contracted service providers with district-hired staff)

Local Educational Agency (LEA) Maintenance of Effort (MOE) Calculator

Quick Reference Guide on Coordinated Early Intervening Services

Quick Reference Guide on IDEA Local Educational Agency Maintenance of Effort

References

Baroody, K. (2011). *Turning around the nation's lowest performing schools: Five steps districts can take to improve their chances of success*. Center for American Progress. https://www.americanprogress.org/issues/education-k-12/reports/2011/02/04/9035/turning-around-the-nations-lowest-performing-schools/

Fullan, M., Bertani, A., & Quinn, J. (2004). New lessons for districtwide reform. *Educational Leadership, 61*(7), 42–46.

Huberman, M., & Parrish, T. (2011). *Lessons from California districts showing unusually strong academic performance for students in special education*. California Comprehensive Center at WestEd.

Shannon, G. S., & Bylsma, P. (2004). *Characteristics of improved school districts: Themes from research.* Washington State Office of Superintendent of Public Instruction.

Appendix

Examples of Data Meeting Cycles

Monthly

Domain	Metrics to Review	Primary Source(s)	Who Reviews	Decision Use (examples)
Access to Core (Tier 1)	Walkthrough fidelity % lessons w/ explicit targets, active supervision, etc.	Walkthrough tool; leader learning walks	Site admin, District Leads	Adjust PD focus; identify model classrooms; schedule coaching cycles
Instructional Minutes	**Service minutes delivered vs. scheduled** (by provider, disability, campus); missed sessions	IEP service logs; provider schedules	SPED leads; related services	Triage coverage; revise service plans; address staffing gaps
IEP Goal Progress	% goals on/above trajectory; students off-track	Progress reports; gradebook; CBMs	Case managers; site leads	Revise goals/supports; initiate SST booster plan
Early Intervention & SST	New SST cases; **time to SST**; pre-referral fidelity; Tier movement (1→2→3)	SST tracker; intervention logs	SST team; counselor/psych	Tighten pre-referral quality; assign interventions; set review dates
Attendance & Engagement	Daily attendance; **Chronic Absenteeism (rolling 30/60/90)**; EL/SPED subgroup	SIS attendance; dashboards	Site MTSS; district analytics	Attendance plans; home contact; transportation/health referrals
Behavior	ODRs per 100; location/time patterns; **Restraint/Seclusion (any month = escalate)**	Office referrals; incident logs	Principals; psych; BCBAs	Antecedent strategies; supervision schedule; Tier 2/3 supports
Courses & Credits (MS/HS)	D/F rates; missing assignments; on-track	SIS gradebook;	Counselors; case managers	Credit recovery; schedule changes; accommodations check

	to graduate (SPED vs all)	graduation tracker		
Compliance	Upcoming IEP/Triennials due ≤30 days; overdue = **0 target**	IEP system	SPED office; principals	Assign facilitators; send notices; escalate barriers

Quarterly

Domain	Metrics to Review	Primary Source(s)	Who Reviews	Decision Use
Identification & Referral	**Initial referrals per 100**, by school/grade; evaluation timelines (≤60 days)	Referral logs; eval tracker	District SPED; school psychs	Calibrate referral thresholds; PD on pre-referral; staffing
LRE & Scheduling	% time in gen ed (80+/40–79/<40); co-teach/resource capacity	IEP system; master schedule	SPED + schedulers	Sectioning; co-teach pairings; aide deployment
Assessment & Accommodations	Use of accommodations vs. IEP; state/local test participation	IEPs; testing platform	Testing coord; SPED	Accommodations training; proctoring plans
Equity & Disproportionality	**Risk ratios** by race/EL/gender for ID, discipline, placement, restraint	SIS/IEP; incident logs	District equity; SPED	Root-cause review; targeted PD; policy checks
Family & Due Process	Mediation/complaints; response times; language access	SPED compliance logs	SPED leadership	Improve comms templates; interpreter scheduling
Staffing & Caseloads	Provider caseloads; vacancy days; sub coverage rate	HR; SPED staffing	HR + SPED	Recruit; redistribute; contract services

Tri-Annually (Fall, Winter, Spring)

Domain	Metrics to Review	Primary Source(s)	Who Reviews	Decision Use
Universal Screening & Tiering	SEL/behavior screener coverage; risk bands by grade/school	Screening platform	District MTSS; sites	Tier 2/3 groupings; PD on Tier 1 engagement
Transition Points	ES→MS, MS→HS IEP transition readiness; CTE access; course of study	SIS; IEPs	Counseling; SPED	Schedule IEP transition meetings; course planning
Program Reviews	Autism/ED/SLD program health: enrollment, staff ratios, outcomes	Program rosters; outcomes	SPED program leads	Staff PD; materials; placement guidance

Annually

Domain	Metrics to Review	Primary Source(s)	Who Reviews	Decision Use
Outcomes Summary	Graduation, dropout, postsecondary, state test prof/perc, growth (SPED vs all)	State/district dashboards	Cabinet; Board; SPED	District goals; resource allocation; public reporting
Disproportionality (IDEA)	Significant disproportionality flags; CEIS set-aside	State APR; district calc	SPED; Finance	CEIS plan; targeted supports; budget shifts
LRE & Continuum	Annual LRE distribution; placements out of district; costs	IEP; finance	SPED + CFO	Program expansion; contracting decisions
Compliance & Timeliness	Annual IEP/Initial/Triennial on-time rates; PPRA/FERPA audits	IEP system; audits	SPED compliance	Corrective actions; training calendar
Family Experience	Annual survey results; translation access; participation rates	Survey; interpreter logs	SPED; FACE	Revise comms; engagement strategy

Staffing Plan	Vacancies, retention, PD hours/credits earned	HR; PD system	HR; SPED	Hiring plan; stipend/PD strategy
Budget & Resources	IDEA/Title/Medicaid revenue, expenditures by program; per-pupil SPED cost	Finance; Medicaid	CFO; SPED	Budget priorities; procurement