

**Ensuring Integration for Students “Different Than”: The Impact of Funding
Mandates on Special Education in Illinois**

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By

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Abstract

Though education is a jurisdiction of the states, services for identified students are federally mandated and protected under the Individuals with Disabilities Education Act, or IDEA. This study consisted of 14 semi-structured interviews with special education administrators in Illinois. Questions focused on how federal and state mandates impact administrator's decision making regarding the services they can provide for students and how unique special education agreements are structured among districts. Findings of this study include why unique special education service agreements arise across Illinois, the impact of a private tuition reimbursement that unduly influences decisions regarding high needs students, and insights into stigmatization of special education services. Additionally, this study reveals that arbitrary changes to funding flow have time consuming consequences, and the teacher shortage within Illinois is impacting the quality of services districts provide to students. This research provides the framework to substantively inform policy recommendations: streamlining and equalizing funding models, conducting more research on the impact of funding mandates, ensuring that communities are educated about students in special education programming, and increasing IDEA grant funding.

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Introduction

“In terms of special education, we are looking at students who need something other than the general core curriculum. There are lots of people who have disabilities in the world, in the United states, in Illinois, and then in our school districts. Not everyone requires specialized instruction. The difference is that when you need special education, you need specialized instruction. Different than—not better than—but different than the standardized protocol for most students in the school system.”

- *Pam, the Assistant Superintendent of Student Services to a stand-alone district in Illinois serving 12,500 students*

In 1975, The Individuals with Disabilities Education Act (IDEA) was signed into law by President Gerald Ford. The intent was to ensure a “free appropriate public education” (FAPE) to eligible children with disabilities across the United States. Education is the jurisdiction of the state legislatures, but IDEA created federally entitled rights for children who met a certain criterion. This legislation resulted in mass resource shifts, cost sharing, and cross district communication to implement the federal mandate.

However, the federal government promised they would guarantee local school districts funds for these additional services. Not once in the history of IDEA has the federal government sent the districts the totality of the money they promised. The law was written as if IDEA grant money would fund 40% of special education services, and the other 60% of funding would come from state funding and local revenue. Currently, the IDEA grant covers 14.7% of the cost of special education services (Strauss, 2019). This implies that 85.3% of funding comes from state and local revenue.

Researchers have not delved into the impact of special education funding mechanisms at the federal, state, and district level. The studies that have been done emphasize the massive knowledge gap and lack of data on how special education is funded. Very little is known about how the mechanisms for funding impact decision making at the district level, and therefore the education that students with disabilities receive. What is known is that considerable funding pressure is placed on state and local governments, but how that pressure manifests itself at the district level remains to be seen.

Special education funding is notoriously complex. Federal mandates, state mandates, and unique interpretation at the district level results in intricate and creative means to provide services to students. In order to begin to tease out a narrative from these complexities, this study focused on special education administrators within Illinois. Special education administrators have the responsibility of ensuring these policies are executed from a technical and bureaucratic standpoint, while deeply understanding how these policies impact the vulnerable population that they serve. By interviewing special education administrators across Illinois, *this study sought to discover how federal and state mandates give rise to unique special education models across districts and how these mandates impact administrator's decision making regarding the services they can provide for students.*

Background

To contextualize the findings of this study, it is important to understand the layers of legislation at the state and federal level.

The Individuals with Disabilities Education Act

States are beholden to The Individuals with Disabilities Education Act (IDEA) Federal law. The law states:

“Disability is a natural part of the human experience and in no way diminishes the right of individuals to participate in or contribute to society. Improving educational results for children with disabilities is an essential element of our national policy of ensuring equality of opportunity, full participation, independent living, and economic self-sufficiency for individuals with disabilities.”¹

Under IDEA parts B & C, services are specified for early intervention for infants and toddlers, as well as services for children and youth ages 3-21. Funding is appropriated to states through both Formula Grants and Discretionary Grants.² Formula Grants provide the federal reimbursement for day to day special education services, while Discretionary Grants are competitive grants typically used for non-for-profit research, professional development programs, and technology.

Sec. 300.162 Supplementation of State, Local, and other Federal funds mandates that money allocated to states through Part B IDEA funding is a supplement to the level of Federal, State, and local funds, “and in no case to supplant those Federal, State, and local funds.” This

¹ “Section 1400 (c) (1) | Individuals with Disabilities Education Act.” Accessed April 5, 2019. <https://sites.ed.gov/idea/statute-chapter-33/subchapter-1/1400/c/1>.

² “About IDEA | Individuals with Disabilities Education Act.” Accessed October 3, 2018. <https://sites.ed.gov/idea/about-idea/>

implies that states cannot cut state or local revenue sources for special education programming because the districts are receiving federal money.³ In order to ensure that the requirements to receive IDEA grant money are met, the U.S. Department of Education has an Office of Special Education and Rehabilitative Services (OSERS) (OSEP, 2019). Within OSERS, the Monitoring and State Improvement Planning Division reviews and recommends approval of state eligibility documents.⁴

Every year, the federal Office of Special Education Programs sends Part B IDEA grant funding to each state's board of education after approving the grant application. Each state has a unique age range for students with disabilities who qualify for Free and Appropriate Education. In Illinois that range is 3-21. The amount of IDEA grant money states receive is based on however much IDEA money that state received in FFY 1999, the relative population of all children in the state in the FAPE age range, and the relative population of children living in poverty in the FAPE age range. Funding is adjusted based on the number of all children, not the number of students requiring special education services. Once the states receive the grant money, the state sets aside money for administrative tasks. Funds are then allocated to districts. The base payment for districts is the amount the district would have received if the state distributed 75% of the FFY 1999 IDEA grant funding, and the FFY 1998 child count for children ages 3-21 enrolled in special education services for that district. This rate is only adjusted if school districts are created or consolidated. In Illinois, the base rate for a district is \$518.62 times however many children the district had enrolled in special education on December 1st, 1998. After base payments, the remaining funds are sent to districts using the following variables: 85% of the

³“Sec. 300.162 Supplementation of State, Local, and Other Federal Funds | Individuals with Disabilities Education Act.” Accessed November 2, 2018. <https://sites.ed.gov/idea/regs/b/b/300.162>.

funds are allocated and sent to districts based on the district's public and private student enrollment, and 15% is distributed based on the district's 3 year rolling average of low-income enrollment. Again, how much money a district gets is based on the general student populations and does not account for the number of students receiving special education services (CIFR, 2017).

Because IDEA legislation requires that the funds are spent by districts in a way that is supplemental to the education of children with special needs, there are specific expenditures that districts tend to use these funds for. Approved expenditures for IDEA funding include: Special education staff salaries and benefits, supplies and equipment used for special education students, travel expenses for personnel, professional development in-services and presenter fees (Straub, Lager, Jilek, 2018). Districts must fill out paperwork regarding the expenditures of IDEA funds, demonstrating used funds in federally approved categories. This paperwork is then sent to the state board of education, which in turn submits the eligibility form for the grant to OSERS.

IDEA is grossly underfunded. The IDEA grants currently only cover 14.7% of the cost of special education services and has never exceeded 20% (Dragoo, 2018). The original intent of the legislation was to have 40% for the federally mandated services to come from the federal government. In Fiscal Year 2018, The U.S. Department of Education allocated \$11,890,202,000 (\$11.9 B.) for formula grants to states. 6,814,000 students were served across the U.S., with the Federal government contributing on average \$1,742 towards the education of each child. This overall fund allocation has decreased from \$12,002,848 in FY 2017 (Budget Materials, 2018).

Because IDEA is federal legislation, any action by states or districts that violates IDEA can be taken up in federal court. This makes the underfunding of the IDEA grant especially problematic for districts. If they do not provide costly services they could get sued, yet they are

not provided the federal funds outlined within the grant. Cases regarding IDEA violations have reached The U.S. Supreme court, which has issued decisions interpreting IDEA mandate. Some more recent cases include *Schaffer v. Weast* (2005),⁵ *Arlington Central School Dist. Bd. of Ed. v. Murphy* (2006),⁶ *Forest Grove School District v. T.A.* (2009)⁷. Respectively these cases ruled that parents or guardians—not schools-- are responsible for providing evidence that a child’s Individualized Education Plan⁸ does not meet the needs of the child, districts do not need to reimburse parents for expert testimonies when the parents prevail in legal disputes with the districts, and that districts must reimburse families for private school tuition when the needs of the child cannot be met in the district. Court cases are typically between families of the student and districts.

Maintenance of Effort (MOE)

IDEA has a “Maintenance of Effort” requirement. In order to qualify for IDEA grant money, the federal government requires districts to spent at least the same year-over-year on educating students with disabilities, based on total year Special Education expenditures. MOE lacks flexibility and encourages districts not to spend on students, because if they spend heavily one year and cannot meet their commitments the next year, they will be penalized. There is an individual who works for the state of Illinois processing all MOE claims, and works directly with districts to ensure that they meet MOE requirements, utilizing following MOE exceptions:

⁵ *Schaffer v. Weast*, 546 US 49 (Supreme Court 2005).

⁶ *Arlington Central School Dist. Bd. of Ed. v. Murphy*, 548 US 291 (Supreme Court 05-18).

⁷ *Forest Grove School Dist. v. TA*, 557 US 230 (Supreme Court 2009).

⁸ Individualized Education Plans (IEPs) are rigorously defined on page 8.

Voluntary Personnel Departure: A staff member leaves voluntarily, therefore leaving a salary gap in the budget

End of Obligation to Provide Service to Exceptionally High Cost Students: A districts has an exceptionally high cost student graduate, leave the district voluntarily, age out of district, or has an IEP change, entailing the district no longer must spend the funds to educate that student.

Costly Expenditures for Long-Term Purchases: If a district purchase equipment, construction, or property in a given year, then they are granted a MOE exemption the next year. These costs are singular and not on-going (Straub, Lager, & Jilek, 2018).

The MOE requirement makes filling out the IDEA grant an intricate process that requires understanding what types of services fall into various categories. If a staffer filling out paperwork slips up and accidently reports spending incorrectly, the district could be beholden to paying additional money the next year.

Least Restrictive Environment

The 1954 *Brown v. Board of Education* ruling striking down “separate but equal” and the Supreme Court noting that “separate educational facilities are inherently unequal” gave rise to a grounding principle for special education: “Least Restrictive Environment,” or LRE (NCD, 2018). This is the notion that students should be educated in as close to a general classroom setting as possible. LRE has been worked into federal and state mandate and is a means for ensuring inclusion for the disabled.

Though LRE is loosely defined, it has been enforced and supported by the Federal court system. The most notable cases are *Mills v. Board of Education (1982)* and *Pennsylvania Association for Retarded Children (PARC) v. Commonwealth of Pennsylvania*. These cases ruled

that placement in regular classroom is to be prioritized over placement in a special education program or alternative programs. In making placements, there is a continuum of services based on the needs of the child: the most restrictive environments are for children with the highest levels of need (ex. a child who is bedridden, unable to function without assistance from a medical device). On the other end of the continuum of services are children who do not need intensive services (ex. a child who needs one hour of speech therapy a week). Regardless of the severity of the child’s needs, the goal is to integrate the child back into the regular school classroom and their community (Taylor, 1988).

LRE is evidence based. Extensive research has demonstrated the positive impacts for students who are integrated into the general classroom setting. Findings include higher academic achievement (Feldman, Asmus, & Brock, 2015), social engagement, improved behavior, achieving grade level standards (Hunt, McDonnell, & Crockett, 2012), and acquiring social, academic, and functionally relevant skills (Spooner, F., & Browder, 2015), (Morningstar, 2016).

Individualized Education Plans

Each student identified as qualifying for special education services gets an Individual Education Plan (IEP) to meet their unique needs. LRE is a fundamental component in the development of a student’s IEP. Under IDEA, a student’s IEP must be created in the least restrictive environment possible for that student. States must ensure IEP’s are “developed, reviewed, and revised for each child with a disability” in accordance with the LRE clause.⁹

⁹ “Section 1412 (a) (4) | Individuals with Disabilities Education Act.” Accessed April 5, 2019. <https://sites.ed.gov/idea/statute-chapter-33/subchapter-II/1412/a/4>.

Across the country, IEP teams are put together to come up with a plan intended to prepare students with disabilities “for further education, employment, and independent living.”¹⁰ IEP teams consist of parents and/or guardians, regular education teachers, special education service providers, a school district representative who is knowledgeable about district resources and can supervise special education instruction, those who have expertise about the child, and when appropriate, the child themselves. The developed IEP must include a date to begin services, the frequency, duration and location of services, and the time of services provided in minutes. These individualized services include but are not limited to speech language and audiology services, interpreting, social work, rehabilitation counseling, physical and occupational therapy, school health services, medical services for diagnostic or evaluation purposes, and parent/teacher training (Wright, Wright, and O’Connor, 2009).

IEPs can look very different for each student. An IEP for one student can entail a study hall once a day, while another student may require a nurse to attend to them at all hours of the school day. However, the federal government does not account for the individual needs of each students IEP when they send funding. This shifts the responsibility of providing the additional funding to properly educate students to the resources of that district. The IEP team is theoretically required to develop an individualized plan that meets all a child’s needs, regardless of district ‘resources.’ Literature written for parents on with students in special education programming is explicit about a family’s right to sue if a district claims the resources to provide services for the child are not available. It is the responsibility of the districts to figure out how to provide services.

¹⁰ “1414 – Evaluations, Eligibility Determinations, Individualized Education Programs, and Educational Placements | Individuals with Disabilities Education Act.” Accessed November 3, 2018. <https://sites.ed.gov/idea/statute-chapter-33/subchapter-II/1414>.

Illinois and the Passage of Evidence Based Funding

In August 2017, the Illinois General Assembly passed Public Act 100-0465, known as Evidence-Based Funding for Student Success Act Illinois. Before, the school funding calculations and distributions to districts were based on a rudimentary three tier system. This system contributed to Illinois being identified as the most inequitable state for education funding in the country, according an analysis by the Education Trust (ISBE, 2018), (Williams, 2015). The inequality stemmed from reliance on local property taxes to fund schools instead of state dollars. In Fiscal Year 2017, before EBF funding distributions were allocated, districts got 68.1% of their funding from local property taxes, 24.4% from the state, and 7.5% from the federal government (Illinois, 2019). A reliance on local property taxes means that the amount of money districts have is determined by local property values, disproportionately favoring wealthy districts. EBF was designed to begin to correct for the inequality by sending more state financial support to districts with demonstrated need.

EBF is groundbreaking for Illinois because it identifies mandatory student to teacher ratios and quantified per student investments (ISBE, 2018). At the turn of the century, education was on “the brink of a scientific revolution that [had] the potential to profoundly transform policy, practice, and research” (Slavin, 2002). The Federal Government had begun funding initiatives to apply scientific research methods to educational programming in order to identify best practices. In 2002, Robert Slavin, Director of the Center for Research and Reform in Education at Johns Hopkins University predicted the push towards research and evidence as a basis for education policy would result in a “scientific revolution” within education. Sixteen years after Slavin’s prediction, Illinois passed a school funding model that uses school demographics, enrollment, accounts for additional funding to educate low income students,

English learners, and special education students to determine how many teachers are needed per district. Based on the necessary funds to hire staff and accounting for demographics, a dollar amount is derived for each district's unique per pupil expenditure, called the "adequacy target." If districts are spending below the adequacy target, the state will close the funding gap. State funds are sent to districts based on their ability to meet the determined adequacy target.

The passage of the evidence-based funding model (EBF) in Illinois changed the entire school funding system in Illinois, with implications for how districts received some state funds for special education programs. Before the passage of EBF, there were eight categorical grants for special education. Districts had to fill out grant applications for each of the eight grants in order to receive reimbursement for various special education services. The "Base Funding Minimum" component of the new law accounts for five of the eight original grants: Gross General State Aid + Stop Loss Grant, English Learner Education, Funding for Children requiring special education services, Special Education Personal, and Special education summer school. The folding of these grants into base funding means that districts do not need to submit paperwork to the state for reimbursements. However, three of the grants remain separate: Orphanage Tuition funded at 100%, Private faculty tuition at 86%, and Transportation at 87% (Straub, Lager, & Jilek, 2018). The percentages indicate what portion of the costs to districts are reimbursed by the state when claims are submitted. Districts must still fill out paperwork for these three reimbursements.

Theoretical Frameworks

Framing the findings of this study around theory is helpful to understanding and contextualizing the specifics of special education funding mandates and their impact. Theory demonstrates that there are common themes across school policy implementation and impact, regardless of the department.

Hess' Theoretical Frameworks for School Policy Reform

Researcher Fredrick Hess provides theoretical frameworks for urban school policy reform that can be used as a lens to analyze and contextualize some of shifting mandates implemented by the Illinois. His purpose in the 1999 book *Spinning Wheels*, “is to suggest how the institutional circumstances of urban schooling conspire to negatively shape policy generation and implementation.” Though Hess’ research focuses on urban schools, he introduces the concepts of “Symbolic Reform” and “Policy Churn.” Though this research encompassed rural and suburban districts and included questions in the impact of state not local reforms, Hess’ ideas manifested themselves in this research and provide a lens to identify the impacts Symbolic Reform and Policy Churn.

Hess’ defines Symbolic Reform as changes implemented in school districts that are imposed to create an illusion of change and progress. These changes are usually unnecessary and are implemented because “urban school policymakers are highly sensitive to community and professional pressures... reform efforts are more heavily influenced by political pressures than by educational considerations” (Hess, 5). By making changes for the sake of saying that policy is changing, policymakers rush through the process of identifying and curating policies that will be effective at achieving the goals of the school: “Policymakers’ emphasis on the politically

attractive aspects of reform has produced inattention to the details of implementing reform” (Hess, 1999, pg.12). Symbolic reform is policymaker’s response to communities demanding results and change within the school system. Instead of learning what the most effective policy changes would be, policymakers seek to appear proactive in the system to dodge the blame and political fallout that accompanies an ailing school system.

The constant demand for Symbolic Reform results in Policy Churn, an “endless stream of new initiatives with the schools and teachers never having the time to become comfortable with any given change” (pg. 52). Hess posits that this constant changing of policies “distracts faculty from the core functions of teaching and learning . . . school improvement requires time, focus, and the commitment of core personnel. To succeed, the leadership must focus on selected reforms and then nurture those efforts in the schools” (pg. 7). Constantly passing meaningless reform implies that staff is wasting time putting a halfhearted effort into trying to implement policy that is not evidence based. Hess identifies reform as being “a hindrance, consuming time, money, and energy while distracting school personnel from becoming more proficient at specific teaching and learning tasks” (pg. 52). School reform is viewed as public relations instead of policy designed to improve educational outcomes, he argues.

Short term policies will do nothing in the long run for school improvement because these policies lack the necessary frameworks and support to be successful. Accordingly, substantive change requires “leaders to become knowledgeable of their organization’s behavior, institutions, problems and culture before proposing changes and to support changes with careful planning, training, and implementation” (pg. 54). In order to implement substantive policies, Hess says the focus should be on student performance and holding policymakers and administrators accountable for results. The public has a role in demanding substantive change from leaders and

policymakers within the educational community. Additionally, results from informed policies may take time-- the goal is for long term improvements not a quick fix.

Though Hess questions the impact of state mandates on school reform, his research identified an emphasis on funding when discussing the state role in school reform. Therefore, within the context of the research presented in this thesis which focuses on funding mandates, Hess' research and theories can applied to the state mandate shifts that impact a breadth of districts across Illinois (pg. 83).

Literature Review

With background knowledge of IDEA, Illinois policy, and Hess' theoretical frameworks for school policy, one can contextualize the academic research around special education funding policy.

The Unknown Impacts of Funding Dysfunction

Though the federal government has never met the funding obligations implied by IDEA, the mandates for students to receive a FAPE are still in place. A study and executive summary released by the National Council on Disability in February 2018 delved into how underfunding of IDEA is felt locally in districts across the country, including “considerable pressure on state and local budgets, resulting in a range of actions including one state placing an illegal cap on IDEA identification, districts and schools limiting hiring of personnel and providers, districts and schools restricting service hours, and districts and schools reducing or eliminating other general programs” (NCD, 2018). This has led to school administrators and teachers struggling to ensure that their most costly and vulnerable students receive an appropriate education. In order to find funds, the cost burden has fallen on to state appropriation, local property tax revenue, and the fundraising efforts of local districts special education foundations.

The National Council on Disability report considered the impact state funding cuts have on special education, in addition to insufficient federal funding. The manifestations of insufficient funding from the state are “cuts at the state level force local school districts to scale back educational services, raise more local revenue to cover the gap, or both” (NCD, 2018). According to the study, little is known about “the impact this lack of spending is having on the delivery of special education, including whether local districts are encroaching on general

education budgets to maintain special education services and whether services to special education students are being reduced arbitrarily to fit the available funding” (NCD, 2018).”

This is very little research on special education, making it difficult to inform policy. According to the NCD executive summary: “No large-scale national study has been conducted since the early 2000s, which limits researchers and policymakers’ ability to understand the true costs of special education”(NCD, 2018). The last comprehensive study on Special Education Costs was published in 2004: *The No Child Left Behind Act and the Individuals with Disabilities Education Act: A Progress Report*. Since “disability categories with significantly larger expenditure ratios have shown substantial growth” the findings of a report conducted 15 years ago may no longer be relevant. (NCD, 2018). Due to shifts in disability categories, the lack research means that evidence-based decisions for the effective allocation of special education funds at the state and federal level cannot be made.

The National Council on Disability report ended by recommending advocacy for the increased funding of IDEA, supporting research that informs states as how to support and serve high cost students, and that states should provide greater oversight and guidance to districts to help maximize federal funds. Additionally, the NCD recommended that the U.S. Department of Education commit to conducting frequent, large scale studies regarding the true costs of special education to inform policy. (NCD, 2018). These recommendations follow and emphasize the necessity for evidence-based education policy and programming.

The problematic lack of research and data collection in the realm of special education goes deeper than what could be identified by a large-scale national study. The 2016 Michigan Education Finance Study “a data-focused analysis of the revenues and expenditures of school

districts in the state, found that there was no way to fully and accurately account for all special education expenditures at the per-student level using current state-collected data” (NCD, 2018).

The Michigan Education Finance Study is not the only literature to highlight gaps in data collection. A report on national special education enrollment statistics compiled by an education think tank, the Thomas B. Fordham Institute stated that “accurate accounting of state, district, and school-level spending on special education simply does not exist.” One reason for this is because IDEA grants are considered “off budget” by many districts: implying “that up to 30 percent of special-education staff costs can be excluded from district operating budgets.” This study emphasized the “scandalous” nature of the lack of reliable financial data at the state and district level. The researchers asserted that “policymakers, parents, and taxpayers deserve to know how much money is spent on special education and for what purposes—in a user-friendly fashion” (Scull & Winkler, 2011).

Studies on the Impact of Funding Mandates in Illinois

In 2010, a study was conducted by Tom Parrish of the American Institute for Research as a direct response to House Joint Resolution (HJR) 24, which stated: “that a task force be created to study current special education funding needs and to make recommendations” (Parrish, 2010). This report provided an overview of special education funding in the U.S. as well as recommendations informed by empirical analysis on special education data within Illinois, compared nationally. The study emphasized the importance of knowing where special education students are placed in order to ensure the state policies are adhering the LRE mandate of IDEA. With the goal of ensuring that as many special education students are in the general classroom setting as possible, Illinois statistics were compared to national trends. The findings showed that while the national numbers of students in least restrictive placements has increased slightly,

while Illinois had held steady. Illinois also has always been slightly above the national average for most restrictive placements (external placements). The national average is 5% and Illinois is at 7% (Parrish, 2010).

Parrish empirically demonstrates the considerable financial burden placed on local funds from property taxes. Concerns about equity within special education funding were demonstrated using 2007 expenditures: the mean special education aid allocation from the state was \$2,832 and the standard deviation is \$1,075. Districts received about \$1,300 per student state wide from the Federal Government. The mean special education expenditure per special education student across all districts in the State is reported as \$10,840, with a standard deviation of \$4,543. The discrepancy between federal and state funding is covered by local resources. Funds derived from property taxes are directly linked to the wealth of a geographic area: low income housing means poorly funded schools and therefore poorly funded special education. Given underfunded special education mandates, costly services have a disproportional financial impact in districts that do not have an affluent tax base.

Major concerns regarding the non-public component of the formula were raised. The 2010 study stated that the 86% reimbursement for private placements and a 4.88% (FY05) reimbursement for public placements “provides a substantial fiscal incentive for private placements, it contributes to inequities in the overall system, and it does not appear to conform to its stated purpose.” 1/10 of all special education funding in Illinois is allocated for private placement reimbursements, which was startling to the researcher because in some regions of the state nonpublic school options were not accessible. This reimbursement mechanism was linked back to why Illinois is at 7% for private placements and the rest of the country is at 5% (Parrish, 2010).

Another alarming finding was that this reimbursement policy does not fulfill its stated purpose of providing “special education services to students with disabilities when the public-school system does not have the necessary resources to fill the students’ educational needs.” If this were the case, then private facilities would be utilized in the highest poverty areas of the state. Instead, the research showed that the second most impoverished area of the state, Region IV, receives hardly any funding through this mechanism and has the highest rate of students enrolled in special education at 20%. Counterintuitively, “nonpublic special education aid per student is highest in those regions receiving the most special education aid from the State’s other special education funding programs.” The report recommended equalizing the reimbursements, which over the past nine years the legislature has not done (Parrish, 2010).

A recent study from the University of Illinois at Urbana-Champaign examined the impact of the public-private reimbursement policy on placements of students, considering LRE. The study included both a quantitative analysis and qualitative interviews with special education administrators. Taken in context with the 2010 study discussed above, one of the notable quantitative findings was that districts with higher operating per pupil expenditure and lower enrollment accessed separate facilities more often. A higher operating per pupil expenditure was significantly predictive of private placement usage, specifically “a 43% increased likelihood that a higher OPPE would lead to increased rates of placement into separate settings.” This finding was counterintuitive because “it would seem more advantageous for a less wealthy district to seek financial benefit from outside placements” (Ambuehl, 2019). The researcher linked the confusing correlation with the two-year discrepancy between reimbursement for private tuition from the state to the district and the monthly tuition fees from the facility: “districts that have higher fund balances can afford to pay the monthly tuition costs without a detrimental financial

effect to the district operating practices (Ambuehl, 2019). This study reinforces the 2010 study demonstrating that the private tuition reimbursement policy within Illinois does not assist the neediest districts, as it was originally intended to.

Some qualitative findings of this study included administrator uncertainty around the impact and implementation of EBF in Illinois, and the continuing need for smaller school districts to rely on the cooperative structure to provide a continuum of services for students with the highest levels of need (Ambuehl, 2019).

Teachers Shortages within Illinois

Currently, there is a teacher shortage in Illinois. A 2018 survey commissioned by the Illinois Association of Regional Superintendents of Schools demonstrates this problem is increasing in severity: “Superintendents in 85% of the districts surveyed believed that they have either a major or a minor problem with teacher shortages, which is up from 78% from the 2017 survey” (Meek & Smith, 2018). The results of this teacher shortage are 1,032 teaching positions left unfilled or filled by an unqualified professional (Meek & Smith, 2018). Special education was identified as one of the areas where teacher shortages are particularly severe. Policy recommendations from this study included expanding programming and support for new teachers, as well as fill in gaps in the data on why there is a lack of teachers in Illinois (Meek & Smith, 2018). Teaching shortages within Illinois, and within special education especially, have implications for the quality and breadth of services districts can provide to their students.

Methods

This study began with a preliminary conversation I had with a special education administrator of a special education cooperative in Northern Illinois. I had expressed interest in learning more about special education funding. The conversation was incredibly informative. Since this individual could provide more insight than any existing research, this study became a formalized version of such conversations.

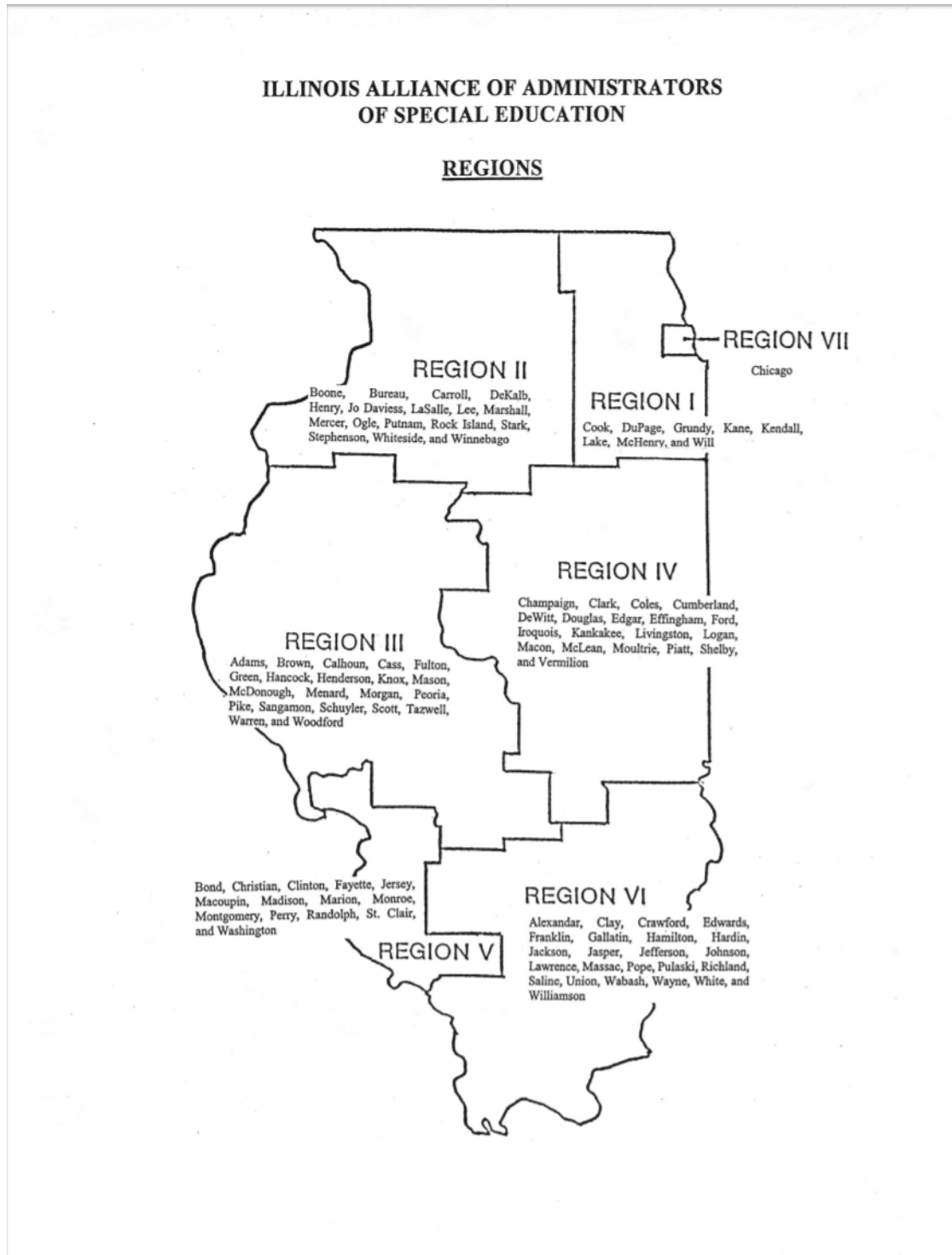
The study recruited administrators across the state because Illinois encompasses a wide range of demographics, resources, and geography. The Illinois State Board of Education reports that there were 2,001,548 K-12 students in Illinois during 2018. The four major racial/ethnic categories are White (48%), Hispanic (26.2%), Black (16.8%), and Asian (5.1%). In Illinois, 49.4% of students are considered low income and 11.7% are learning English. *14% of students have IEPs* (Illinois, 2019). Overall, the estimated population of Illinois is 12,734,617. The Chicagoland area has a population of around 8.3 and 9.8 million people, contingent on how the boundaries are drawn. The high population concentrations in the Chicagoland area lend Illinois to a distinct urban/rural divide, and therefore large discrepancies across tax bases and resource accessibility. Regardless, districts are beholden to the same state and federal funding mechanisms and mandates.

In order to recruit participants, the Illinois State Board of Education public list of approved Special Education Administrators was used to find emails to send interview invitations. There was roughly a 20% response rate to the emails. The email template is provided in the Appendix.

Preliminary research on the district the participant worked in occurred before the interview, so the I knew if the district was a cooperative or standalone, and where in Illinois the administrator worked before the conversations began. The interview questions focused on the impact of funding mechanisms and reimbursements that were discussed in the background research. Semi-structured interviews were conducted throughout the study to avoid redundant questions. The interview questions and participant recruitment methods are detailed in Appetencies A and B.

In order to ensure that interviews encompassed both the urban, suburban, and rural settings, the author used The Illinois Alliance of Administrators of Special Education Administrators regional map (IAASE). IAASE has divided the state up into seven regions which were used to identify where the participants districts are located. The map, taken directly from

the IAASE website is here:¹¹



¹¹ “IAASE Region Representatives.” Accessed April 11, 2019. <https://www.iaase.org/page?page=45>

Out of 14 interviews conducted, the districts represented come from the following regions:

Region I	7
Region II	4
Region III	3
Region V	1

Though participants were primarily located in the northeast of the state, the regional discrepancies across interviews is justifiable given population concentrations. Region I in the northeast of the state was home to 65% of the K-12 overall student enrollment and 60% of all students enrolled in special education in 2010 (Parrish 2010). One can assume that populations of students have not changed significantly since 2010.

This study received approval from the University of Chicago’s Institutional Review Board and contained all necessary protections for research participants. On average, participants had 25.16 years of experience working in education. Religion, gender identification, and race/ethnicity variables were not collected from participants. Interviews were conducted over the phone and recorded with permission of the participant. The interviews were transcribed by the author. Transcripts were subject to narrative analysis and common themes were identified. The Findings section is a synthesis of the data. Pseudonyms are used throughout the Findings section of this study. Additionally, potentially identifying contextual information regarding the administrator’s district or cooperative (i.e. the exact number of students in the district or number of districts participating in a cooperative agreement) was slightly modified to protect participant anonymity. Modifications do not to obscure the participant’s context relative to findings.

Findings

Subsections in the findings are divided around the answers to questions participants were asked during interviews.

Special Education Service Models in Illinois

After the passage of IDEA, districts had to find ways to ensure that they could provide highly specialized services to a small number of students. The federal government provided little to no guidance regarding how states or districts should provide these services. This resulted in the passage of IDEA having a unique impact and implementation within all 50 states. Hawaii, which has one school district has completely different means for providing special education than Illinois, which has 852 districts.

Since 1975, districts in Illinois have provided special education services through either cooperative arrangements or districts providing all services within the districts. “Illinois has been working cooperatives organically according to our needs to over 60 years. If you are going to undo that, at the state level, at least have the decency to study who these agencies are, and the dozens of ways they have evolved into funding themselves differently, charging for their services under different models,” expressed Alex, an administrator with 18 years of experience in special education. Special education services models arose due to the needs, resources, and location of the districts. Conversations with administrators from the different models helped highlight common themes. Most administrators had experience working in all the different models and could speak to the benefits and drawbacks of each.

Traditional Special Education Cooperatives. Special education cooperatives are a way for districts to conglomerate resources. Traditional cooperatives tie together schools in an

immediate geographic area and have their own school or schools. A major benefit is consolidation of resources and ability to regionalize services. Ann, the Director of a traditional cooperative with 30 years of experience explained a traditional cooperative as an agreement were “not all districts are large enough to support students, especially low incidence students that are complicated in their needs. [These districts] establish a special education cooperative to service those school districts.” Ann’s cooperative provides “service[s] students that have moderate to severe disabilities while the districts services low to moderate.” As exemplified by Ann’s quote, not all students requiring special education services attend a cooperative location. The students who can be provided services in their school remain there, while the students with more complex needs are educated at the cooperative location.

An example of how traditional cooperatives can benefit students through providing highly specialized services is the following: Special education co-ops can have an entire department devoted to the auditory needs of children. If a child’s hearing aid breaks, and it will take weeks to get a new one. However, co-ops with an auditory department can ensure that the child has a loaner hearing aid, so they are not without sound until the new one comes in. Pooling resources for special education in one location help ensure that schools can offer students a continuum of services, even if the services are not provided within the school itself.

A drawback of this model is that students do not typically attend class in their local school, though Traditional Cooperatives are tied together by geographic location. However, these cooperatives are necessary in ensuring that districts, especially smaller ones, have a location that can provide services to high needs students.

Conversations with administrators on the impact of funding shifts demonstrated that billing practices vary. Sometimes the cooperative handles the IDEA grant funding and sends the

funds back to districts, other cooperatives bill the districts and the districts fill out the IDEA grant themselves. These arrangements have arisen over the years and are unique for each cooperative. How cooperatives are paid by districts also impacts what the special education administrators are responsible for and how funding shifts impact their job, which will be detailed later in this section.

Low Incidence Cooperatives. The Low Incidence Model for cooperatives focuses on providing personnel and sending them to schools. In the words of Alex, the director of a low-incidence cooperative, these agreements “tend to cover much larger areas. They provide less student programs, and they provide more specialized services, like hearing and vision. Those people need a lot of school districts to have a full-time job.”

Low incidence co-ops do not have a school location, though they may operate minimal programming through district agreements. For example, Alex’s cooperative operates a deaf and hard of hearing program. Laura, the Director of a Low-Incidence Cooperative with 25 years of experience explained her district: “We don’t have programs. We don’t have a school. Our services fall into some broad categories. I would say that the first category would be staff. We have [around 170] staff members; we service [eight] school districts.” Because the staff travels, these Low Incidence Cooperatives cover much larger areas, often spanning multiple regions. As Laura said, the primary focus is to hire specialists who travel between schools and educate children in their home districts. She noted that “from the outside looking in, there would be no difference from my staff member and a member that belonged to the district.” As Alex noted, one of the major benefits is ensuring that specialists have a full-time job. Sharing staff is attractive to smaller districts who may not have the number of children requiring a highly specialized service to justify hiring a full-time person. This is convenient for the school districts.

“Suppose you have a high needs kid that comes in [to the district], that’s a lot of minutes” said Laura, “the nice thing about a cooperative is that that kid could come in and we find you somebody. That kid moves out, we take that person away. You can ride the ebb and flow of kids coming in and out with varying degrees of need.” Low incidence cooperatives that focus on staffing allow for flexibility within the districts as far as fulfilling the needs of students, without the pressure to find a full-time staffer.

Like Traditional Cooperatives, Low Incidence Cooperatives have different means of receiving reimbursement for services provided to districts. Administrators detailed unique funding agreements for their cooperatives: districts can pay membership fees and the districts are provided services as necessary or districts can pay for services by the hour.

Rural districts utilize the low-incidence model. Ross, the Special Education Director of a rural co-op serving 8 districts in Region II said the largest school district his cooperative serves has 2,000 students and his smallest has 100. Sharing services is an effective way to keep the costs down. Ross also noted that “it is so rural in some of the areas it’s difficult to get any services out there whatsoever.” The districts are inclined to stay in the cooperative agreement because they are far too small to begin hiring their own staff. With around 180 employees, Ross’ cooperative is one of the largest employers in one of the counties it serves. Accordingly, districts in the surrounding counties are looking to join the cooperative agreement.

Administrators noted that some difficulties of this model are the logistics of staff traveling long distances between rural districts and ensuring all districts receive the services they need as quickly as possible. Coordinating staff traveling between districts to provide services during the day when a long drive involved can be tricky. Additionally, if a new student enters a district, it can be difficult to ensure there is a staffer to meet the needs of that child right away.

Hybrid Cooperatives. The low incidence and traditional models are not static and exclusive. Some cooperatives have schools as well as staff to send to districts. Lisa, the director of a cooperative that serves 20 rural districts described her cooperative as “very, very different”:

“Our largest school district is the one where our building is currently located. We are separate district from the school district here in town, but it is our biggest district as well...right now it is set up that each of the districts pay an assessment that we provide or create for them. Then, within those assessments, they get all the services that we offer...we have a severe behavior disorder program here in our building, and we have learning in functional environments. Then we offer deaf and hard of hearing and vision and occupational therapy, physical therapy, school psychology services, supervisory services. We just provide them to all the districts as needed. We work together all the time if you need a service. Some of our little districts never need much at all.”

Lisa’s description is a perfect representation of both the extent of the programming that special education entails and the necessity for unique regional arrangements. This cooperative has multiple school locations as well as services to send directly to districts, contingent on the needs of individual schools. Districts pay a unique assessment fee based on their needs to access the cooperative’s services. An arrangement such as this arises with smaller, rural districts because, according to Lisa, the participating districts “could not provide all those services on their own.”

Directors of cooperatives in rural areas have districts in their cooperative that have never utilized their services. As with all cooperative agreements, if a high needs student were to enter a district, according to Lisa, “we just jump in and do whatever we need to do to support a district. If a student moves into a district with high, severe needs, we would address that for them. For some, it’s just the insurance portion of it. They are not willing to take the risk without the support of a cooperative.” Even if a district is small and never has utilized the cooperative agreement and services, they do not want to risk not being able to provide services if a high needs student were

to move into the district. In comparison, a massive suburban or urban school district has enough students to justify having their own internal programming without the support of a cooperative.

Stand Alone Districts. Districts can decide not to participate in a cooperative agreement with other districts and provide all special education services within the district. Typically, these are large school districts with the number of students to cost justify providing all services within the district. There are enough students within these districts that the incidence of students requiring special education allows stand-alone districts to staff and provide their own programs. Pam, the Assistant Superintendent of Student Services to a district serving 12,500 students explained how her standalone district can provide the full continuum of services: “The reason is that we can that is because of the quantity of students we have. We have enough students to create classrooms with reasonable age ranges and disability and student needs that we can address a variety of different types of disabilities, students’ needs and meet the needs of preschool through 8th grade.”

An advantage to having a stand-alone model is that it keeps students closest to home, allowing for more inclusive practices. The students participate in extracurricular and academic activities with their peers, neighborhood, and community. Additionally, Allie the Director of Special Education of a small standalone district in Region II with 18 years of experience elaborated that having a standalone district “makes easier to build culture throughout the entire district for advocating for students with disabilities, building close friendships and relationships with families because most of the families stick around." Standalone districts also allow for special education administrators to decide for themselves what curriculum to implement and which personnel to hire.

Essentially, standalone arrangements are costly for smaller districts. This arrangement is most common in large districts with the population to justify hiring the personal required to administer the necessary services. Additionally, having a stand-alone district allows for more local control and keeps the students close to home.

Special Education Models Fluctuate

The agreements between school districts and cooperatives are constantly changing. Sometimes participating school districts will pull out of cooperatives and either become standalone districts, join a new cooperative, or arrange a new cooperative agreement with neighboring districts. Cooperatives can collapse when too many districts pull out. Annika, an administrator in a small district in Region I detailed why her district pulled out of a cooperative: “I had people floating in who work with my kids, but I had no say over who they were, I did not get to have any input in the evaluation process for them and give them constructive feedback, and that was not working.”

Additionally, being a part of a cooperative agreement can be costly for districts which is cited as a reason many of them leave the cooperative agreements. Annika described the membership fees for the cooperative her district had been a part of as “exorbitant.” Her district entered a new cooperative agreement that suited their unique needs, because her district was too small to provide services on their own. The new cooperative offers insights into the hiring process, which Annika likes. She also detailed how a district she had worked at previously pulled out of a cooperative because that cooperative no longer had professionals to send to schools. That district is now stand-alone, has come up with an arrangement to share some staff with neighboring districts.

The re-arrangement of cooperative agreements demonstrates the necessity for sharing services, especially within smaller districts that do not have enough students to justify hiring a full-time staff member. Allie is the director of special education in a small district in Region II that is standalone, but it was not the choice of the district to be standalone. When the cooperative this district participated in dissolved, the district was forced to begin providing their own services. The major drawback to this situation was the huge financial burden to provide all special education services, without the benefit for a cooperative to share those expenses. However, when some neighboring districts began to form a cooperative Allie's district decided to remain stand alone. The superintendent and the school board had found a way to manage the financial situation. Like other standalone districts, Allie said her district likes having local control over personnel, programs, and services.

Private Facility Reimbursements within Illinois

For some students with highly specialized needs, districts do not have the resources or programming within their schools to properly educate the child. This means districts must find an alternate placement that provides the appropriate programming or develop the program themselves. Some districts have the option to send the child to a for-profit private day school or another nearby school district with the necessary resources to educate the child. Sending a student to an outside placement means the district will have to pay tuition to that entity.

As discussed in the background, the private facility tuition reimbursement covers a portion of the private facility tuition costs incurred by the district from the prior school year. This reimbursement was funded at 86% by the state of Illinois in FY2019. The reimbursement for sending children to a local public option instead of the private is around 0%. The 2010 study found this to be highly problematic because this financially incentivizes sending students farther

away, violating the LRE clause of IDEA. Because of this reimbursement, districts are inclined to pick a farther away private option instead of a closer public school. In the words of Pam, the reimbursement “is diametrically opposed to encouraging districts to place students in the least restrictive environment, when you look at the financial considerations.”

Administrators described this reimbursement as “unfair and not equitable,” “absolutely ludicrous” and “backwards.” Laura, the Executive Director of a low incidence cooperative serving seven districts expressed her frustration about this policy: “You can certainly tell people they are not to be thinking about money, but reality is that everybody has to. It is unrealistic to say that they shouldn’t be considering money. Of course, you are considering money when you are talking about \$120,000 for a school.”

Administrators stated that the level of care at these facilities is comparable to public schools because the facilities must go through a state approval process. Additionally, it was expressed that the private world will always have a place in assisting with the challenges of special education. But accordingly, the current policy of rewarding private placements over public is counterintuitive and results in violations of the LRE clause of IDEA. Ed, the director of a cooperative in Region V said that “it’s only a matter a matter of time before our entire state system is going to be determined to violate LRE. I think the sooner we fix that the better off we are. It would fix a piece of our system that is very broken right now.”

Administrators shared their experiences with the extreme financial pressure the unequitable reimbursement policy places them under, while trying to balance the best interest of the students. Allie has two kids in an out of district public program. The district was too small to provide the required services and a private placement was too restrictive for the students. Sending the students to the least restrictive option costs the district around \$120,000 for two

students. The district receives no reimbursement because the program exists in a neighboring public school. Laura, though her cooperative is stand alone, described a conversation she had with another special education director who has a student enrolled in another public school. The student needs a one-on-one professional working with them all day. The tuition is \$74,000. “This is one kid” she said, “No reimbursement.”

Another profound impact inequitable reimbursement has is the reduction of public programming. According to Laura, “About two years ago, we closed our alternative school. One of the reasons was we closed that alternative school was that it was fiscally more responsible to send their kids to private. No one is ever going to come right out and say that we did it for money, because that’s illegal. But you can certainly in an IEP meeting talk about how great it is to have this private option right across the street from the public option.”

Conversely, administrators said that the equalization of the public private reimbursements would allow them to begin developing programs within their districts. Mary used programming for medically fragile students as an example:

“If we had the funding, we could run programs for the three kids we have who are medically fragile—but there is no funding to do that, so we end up having to send them out of district. If we got a reimbursement for that [developing a medically fragile program], it would free up funding to be used to develop those programs. It would make a huge difference, also, in how many school districts themselves would be willing to offer those programs. If I don’t have enough kids, I could still offer a program that other people could send their kids to. But they don’t want to send them to me, because I am a public school and they get no reimbursement.”

Mary’s words illustrate how the reimbursement policy puts administrators in a bind. This policy not only favors a placement that might be not be in the best interest of the student but restricts the district’s ability to begin providing these services locally. School districts that theoretically could offer programs for highly specialized needs cannot begin developing these

programs: neighboring school districts could not afford to send their students to a public placement, even if the program was a better option for the student. If the reimbursement was equalized, according to the special education director of a standalone district, "it would open more doors to receive services in least restrictive environments by opening up any school district within driving distance of this district, if I came up with agreements with those school boards."

Administrators in rural areas expressed that they did not utilize private facilities for their students because there were no private facilities nearby, a finding that qualitatively enforces the findings of the 2010 study. Ross, an administrator of a rural cooperative said that he had to open a public behavioral school in his area because all the private, state reimbursed options were too far away: "We don't have a lot of options." Accordingly, "the way the financial structure is set up, if I had a private facility in my backyard, I would not run my own behavioral school." He found this highly problematic because "we know the kid, we operate the program. It's costing us more to do that on our own than to have a private facility. Which is completely backwards." The lack of access to private facilities within a rural setting means that students are being educated in the LRE within these districts, however, it is costing these districts more money to develop these programs. It is counterintuitive that rural districts are being punished financially both for their location and adherence to best practice.

Another consideration in the public and private placement reimbursement policy is that parents often do not understand why LRE is critical to their child's success. As discussed in the literature review, there are evidence-based benefits to keeping children closest to home with maximum general setting classroom time. However, the notion of sending a child to a 'private school' often feels better for parents even though it is not best for the child. Ann, the director of a traditional cooperative with 30 years of experience said that districts will send students away

because it “sounds better to the parents and is more psychologically powerful and socially palatable to say that your child is going to a private placement.” Administrators emphasized the importance of parent and community education in this area. Ann pointed out that “in a cooperative, we do everything we can to transition our kids back at least on a part time basis, whereas that transition process rarely occurs private placement. There is also a social understanding that is a kid goes private placement they are probably never coming out.” Ann’s point was further extrapolated by Alexia, another cooperative director: “private for-profit organizations meet their payroll by enrolling more kids. There is a conflict of interest with least restrictive environment. They [private for profits] need these kids in order to function and yet there are public school employees trying to get them [students] back to the least restrictive environment.” A for profit facility has an incentive to keep children enrolled, not to integrate the child into their community. Public programs are designed with the intent of integrating children back in their communities and adhere to all Illinois curriculum guidelines, which is not the case with private facilities.

Hess’ notion that policymakers are more concerned with public perception and personal agendas than the best interests of students align with this reimbursement policy. Legislators within Illinois benefit from the public misconception that private placements are always better for students, because parents are then grateful for the state paying private school tuition. The private for-profit facilities have a powerful lobby in Springfield that has the ear of democratic legislators. Though research clearly demonstrates that equalizing the reimbursement is best practice for students, legislators refuse to act because they have political incentive not to. This entails that the families of the severely disabled are not a powerful voting bloc.

When asked about what it would mean to have reimbursements equalized, Laura said that “It would mean that we are following the law. When we sit at a table with a family, we are making cost neutral decisions. It means money does not have to be a part of the thought process. To me that is a part of the student’s rights.”

Impact of Changes in How IDEA funds are sent to districts within Illinois

In July of 2018, Illinois changed the way that they will send IDEA funds to districts. In the past, funding was sent directly to cooperatives that agreed to submit the grant for their districts. Now, the funds will be sent directly to the districts and the districts will have the responsibility of sending IDEA money to cooperatives. Standalone districts are not impacted by this policy change because they process all their own IDEA grants. Additionally, some cooperatives have their districts fill out their own IDEA funds first anyway.

This funding shift could be problematic if the feeder districts have a wide range of per-pupil expenditures: some cash strapped districts may want to hold onto funds out of sheer necessity. The funding flow change may modify how these districts pay their cooperatives, now that the money does not go to the cooperatives directly. Lisa, the director of a cooperative in rural Illinois said that “[when this policy passed] people were very worried, and I was too. I was afraid that people [districts] might pull out of the co-op. There has been talk about people [districts] doing that type of thing, because the money is different now and they see it differently.” Illinois has agreed to push back the implementation of this change by a year, so administrators can better negotiate with their districts, streamline the process, and figure out how this change will impact cooperatives across Illinois.

Alexia, the director of a cooperative with 23 years of experience described the process of preparing districts within her cooperative for the funding flow change:

“We will be helping each one of our member districts write grants very similar to how it has been written in the past. Instead of one grant, we are writing fifteen. Our business office will have to create invoices to send, and then our districts will pay us back and create line items in their budget to create federal revenue sources. We are having a workshop in about a month with all of our district business managers to explain how they need to create their budget this year, how to add federal revenue lines and what dollars to put where and then doing the invoicing back and forth.”

Though administrators said that their services for students would not be impacted, the change is an unnecessary hassle and creates more work. Because the IDEA grant is highly technical and has unique restrictions, administrators of cooperatives that have filled out the grant in the past have been scrambling to ensure that they educate business managers within districts how to do so. Laura explained that to the individual writing the IDEA grant “must know what ‘counts’ and what does not count.” If the grant is filled out improperly, because of the ‘supplement and not supplant’ component of the legislation and related MOE requirements, “if you are not prepared for it, it will appear that your district took in an additional million dollars...mean[ing the district] must spend an additional million dollars on special education,” elaborated Laura.

Cooperatives that handled this paperwork in the past have the staff and the expertise to do so effectively and efficiently. Now, this paperwork will be handed over to individuals who have never done it before. Switching up the personnel that fills out the IDEA grant has the potential to give rise to the problem Laura described. Because of this change, administrators of impacted cooperatives are scheduling IDEA grant training sessions, taking time away from other priorities to satisfy an arbitrary funding shift.

This funding change seems to have been made by the state without consulting the special education administrators who will be dealing with the full brunt of the impact. Administrators expressed annoyance at the headache and paper shuffle the state of Illinois has created for them.

Ed, the director of a cooperative serving 23 districts said that though programming and students will not be impacted by this change, he “think[s] it's better if IDEA goes to co-ops first because it's a more efficient way of doing it, plus co-op staff are the ones that have the experience with the grant. The districts don't. That will be an inefficiency that we will have to deal with.”

Unfortunately, the attitude of most administrators was that they would simply deal because they are used to uninformed mandates impacting their work. This process is a perfect representation of the on the ground impact of Hess' notion on Policy Churn: making more work and wasting time for the sake of changing mandates. From a research perspective, this change in the flow of IDEA has no positive impact on districts and merely creates more work and frustration.

Paperwork and streamlining

The extensive paperwork required for special education was often described as a necessary evil. As detailed in the background, there is extensive reporting on special education services and expenditures at the state and federal level. Because all expenditures using the IDEA grant must be closely monitored and used for the specified categories, the services must be documented and reported down to the minute. Additionally, any Medicaid funding that is utilized for special education services needs to be closely tracked so it can be accurately reported. There are consequences for inaccurately reporting services, including MOE requirement violations and potentially not being fully reimbursed for services.

The reporting and claims process is a highly technical and requires scrupulous data collection practices. Mary, the special education director of a standalone district described said her district “couldn't do the reimbursement and claims process without our entire business department helping us. It's all very financially technical, and our background and expertise in student issues, assessment, placement, and disabilities. It definitely takes all of our special

education and administrator staff and finance staff to be able to do that.” Mary’s words illustrate that districts often have entire teams within their special education or business departments dedicated to this job. A benefit of being a part of a cooperative was the expertise in the data reporting and the IDEA grant the employees had: a benefit that went away when the state of Illinois decided to arbitrarily change the IDEA grant flow. According to Mary, “the whole financial piece through the state is very difficult.”

The necessity of having an entire staffing team to help with these processes is made clear when there are no resources to provide such staffing. Some districts have one person handling all the paperwork that an entire business department would handle. Allie, a special education director who does all the paperwork herself described the process as “ridiculous...it absolutely takes take away from students”

Additionally, the state of Illinois was identified by the federal government for mismanaging money. As a result, the Illinois General Assembly passed the Grant Accountability and Transparency Act (GATA), requiring districts to demonstrate exactly how federal grant money is spent. This entailed “adopting federal guidance and regulations applicable to such grant funds.”¹² So, federal government special education programming created 21 indicators for districts in Illinois to fill out. If districts trigger an indicator, then administrators need to write a report on why they were disproportionate for students enrolled in certain special education programs. Alexia shared her thoughts: “I understand why they created the indicators...but there is a lot of paper pushing. ...When I was [Special Education Director] at the district I previously

¹² “30 ILCS 708/ Grant Accountability and Transparency Act.” Accessed April 9, 2019. <http://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=3559&ChapterID=7>.

worked at, we constantly got flagged for having a disproportionate amount of African American students with disabilities. Twenty of them. And it was disproportionate. But if you looked at the history of these students, it was legit. 3 of them had down syndrome and 5 had autism. It wasn't that we were overidentifying these kids, they had special needs." According to Alexia, indicators are "are frustrating and don't really do what they are supposed to do." Molly, the director of a cooperative serving eight districts echoed Alexia's sentiments, recommending "eliminating or cleaning up the GATA process" because it is "not a good use of administrator time."

Administrators noted the redundancies across reporting systems and expressed annoyance that databases were not streamlined. Currently, staff must enter the same data into two different systems: IEP Student and Reporting System (I-STAR) and Schools Interoperability Framework (SIF). "It's amazing to me how those two systems don't correlate and cross reference as much as they should" said Ross. The process was described as "cumbersome" by Ed and Mary. Additionally, entering data into two different systems leaves room for error. Alexia detailed the implications of working with systems that are not streamlined: "We had a statewide conference [of special education administrators], and the state said that they think our numbers are about 80% correct. All the administrators jaw dropped. Well what does that mean? Does that mean we are not collecting all the money?"

Lisa said that the hardest part of her job is that "they have turned it into so much paperwork down to the evaluations, down to special education just being an extremely laborious amount of paperwork required that changes all the time." In context with the rest of the data in this section, Lisa's words encompass Hess' theoretical framework for school reform policy. The 'they' Lisa refers to are policymakers and the federal and state level. Instead of doing the research required to implement substantive policies in special education, policymakers increased

reporting requirements. This creates/created the illusion of action from the federal and state level. Yet, more paperwork is not effective practically because it results in erroneous data reporting and wasted time. Though special education administrators within Illinois did not mind the necessary reporting for their work and stated its importance, they were annoyed with the constant benchmarks and additional paper pushing. Removing and streamlining unnecessary reporting requirements would divert resources back to the goals of special education departments instead of state and federal symbolic reforms.

Special educator shortages in Illinois

Though this was not a question in the interviews, administrators were adamant about the inability to find qualified professionals to work in special education. This finding is supported by the Illinois Association of Regional Superintendents of Schools survey findings. Lack of a qualified candidate pool came up regardless of the type of district or how well the district was funded. Ross said his mom's career as an English teacher inspired him to pursue teaching, and his father-in-law's advice helped him choose special education. His father-in-law is a superintendent and informed Ross: "We need people in special education. You will get hired immediately. There are very few males in it."

Finding and keeping qualified staff was described as the hardest part about being a special education administrator. When asked about the biggest challenge facing standalone districts Pam said "I think the greatest challenge is staffing. Recruitment and retaining the variety of staff that we require to meet all of those needs." Special education services are highly specialized and require specific skill sets. Pam said the shortage was apparent when searching for teachers who were trained in "bilingual special education or serving students with severe social emotional and behavioral needs."

Administrators were concerned with the lack of qualifications of current teacher applicants. Lisa, a cooperative director 35 years of experience expressed her about staff shortages within special education. "I hate to say it but some of the people coming in are, they don't always belong in the classroom. They are not coming in the skills necessary to walk into a room and be successful." Additionally, if anything happens to a child due to an oversight by an untrained staff member, the district is now legally responsible for whatever happened to the child. "It makes me very nervous" stated Annika, "you can't have an incompetent teacher anywhere. But if you have an incompetent teacher working with the most complex kids. You not only create an equity breach, but second to that is potential liability."

Administrators discussed the stigmatization of the teaching profession within Illinois as a deterrent for people going into the field. Lisa was concerned with the teaching profession's reputation: "Education, public private education has gotten such a bad rap over the years. 'Oh, teachers only work nine months and are overpaid.' ... It's negative and turning people away." To fix the problem Allie recommended that Illinois policy makers provide "more loans and scholarships to improve the number of people that are available to provide services to students with disabilities, specifically speech language pathologists, school psychologists, and special education teachers that are specialized in particular populations, including low incidence, physically handicapped and autism."

Additionally, Alex, the Director of cooperative with 18 years of experience and whose parents taught special education, ("I grew up going to the special Olympics every year") had an additional insight beyond lack of financial incentives-- the need for a professional community and support system. He made the following case:

"I think creating a culture of engagement is key for cooperatives. If you are a group of one out in a school district if you don't have a professional community in your content

areas specific needs. That can have an impact on how people feel about their jobs and if they are willing to stay. They can feel less support-- they can feel that no one is telling their story. For all of the human reasons, we like to be with others who are in the same boat. I think that maybe overlooked is the stability that co-ops can lend by being able to effectively engage their employees.”

Alex cited professional engagement as a benefit of cooperatives: creating a supportive community of individuals who can bond and grow based on similar experiences. The necessity for professional engagement due to the nature of the work was reinforced by Ann who brought up that special education “can be burdensome to staff on the emotional end.”

Understanding special education programming

Among both standalone districts and cooperatives, special education administrators voiced their frustration with the lack of understanding about their programming and the unique needs of their students. Administrators expressed that individuals working in districts that do not have a background in special education can hold animosity towards special education students and programming because they don’t fully understand how the services work. Special education departments are tired of the rest of the school labeling their students as ‘SPED kids.’ “I hate that term with a passion, because what we are doing is identifying students on their eligibility when what we need to be talking about is our students in general and working together to meet our students’ needs, for all students,” expressed Lily, an administrator serving in a standalone district in Region I. According to Laura, a cooperative director, ostracizing special education students and referring to them as “those SPED kids” is a means to “segregate and shame” students. Part of the animosity towards special education services and students stems from students being counted in a unit of one. Annika explained why this is problematic:

“...kids are counted in a unit of one. So regardless of needs or complexity of the students, one is one. But what if all of these kids have the most complex needs and need that

speech pathologist for up to four hours a day just to be able to make progress? That is something that is absent in funding and reimbursement. I think about kids that are multiply handicapped in some of our programs. The time that a physical therapist gives to them is the same as a student who has a low impact disability: a student who is wheelchair bound all day and can't speak, has regular seizure and is working for any fine motor control at all, and a kid who needs some assistance in physical education. Those two kids are counted the same."

As demonstrated by the above quote, the cost for the considerable resources required for the first student are averaged out with the second. Then every student looks costly when there is one student with complex needs. Accordingly, this leads personnel outside of the special education department to question the practices of the special education department, resulting in tension. Sally, whose cooperative serves seven districts, pointed out that a lot of resources and staffing goes into a \$120,000 student that it is frustrating when people assume that all her students are costly. "I just wish people had a little more time and desire to actually learn about it," she said.

Allie elaborated on the unique needs a student with cerebral palsy who cannot communicate without an automotive device that costs \$25,000. This Eyegaze piece of equipment that had to go through a recommendation process, requires four different individuals with four different expertise to trial the student, and requires ongoing management of annual repairs. Additionally, there is a business side to the purchase which includes warranties, grants, and mandatory expenditure reports: "The management, the distribution, the tagging, the warehousing-- it takes a team with special expertise and knowledge. Not one person does it all. For one child"

Tension is between special education departments and the rest of the district is also driven by underfunding for mandated services. Ross advocated for the full funding of IDEA because "I think it would help people get along a lot better. Special education eats up a lot of

cash and it's not reimbursed very well. Or funded for that matter. That gets some people prickly when you try to do more, but we don't have a choice or option to not do it."

A lack of understanding programming is an underlying issue of school policy reform detailed in Hess' theory. Without knowing how current programming is structured, implemented, and tested for effectiveness substantive policy cannot be created. In terms of special education, the research demonstrating that even within immediate district buildings there is a lack of knowledge about special education services and students demonstrates that policymakers are probably clueless. The knowledge gap implies that policies being passed regarding special education are not based on understanding and evidence.

Evidence based funding impact within Illinois

EBF was well regarded by special education administrators. According to Annika, "I can't say that it's had a huge benefit directly for the special ed programs. But what I will tell you is that we [the district is] are slated to get an extra \$1.8 million. This means we will do better in general education, and when you are doing better in general education you are doing better to support your kids in special education." Annika's input on the impact of EBF was echoed by her fellow administrators. Though many of their programs were not impacted directly, administrators stated that there is a lot less worry among school personnel overall due to the constancy of payments and slight funding increases for some districts. Additionally, the constancy in payments allows for budgeting, which was difficult when the state did not pass a budget in 2016. In the words of Lisa, though she has not yet seen direct benefit from EBF within her cooperative:

"...the superintendents within our cooperative maybe felt like they had a little more financial security...they were getting very stressed about any type of assessment we may give to them. Very nervous, 'We can't take any kind of an increase, but we can't go

without your services, not sure if we will be able to pay for them.' I feel like it [EBF] relived some of that pressure and stress.”

In addition to helping stabilize districts many administrators have also been able to hire more staff. Joan, the director of special education in a standalone district with 33 years of experience was “able to hire a new CPA, school psychologist, and an additional special education coordinator.” She also “just got approval for a new specialist.” Joan said that these new hires under the EBF have “absoulutly” had a positive impact in her district. There was a lot of excitement in Joan’s district around the hiring of the new special education coordinator: “We have had to curtail some of her access because so many people were trying to reach her. We had to put a process in place so that people had to go through making sure they had data and talked with a social worker before outright accessing her.” Robin, the special education director in a standalone district said that “based on what I have seen, and what is happening in our district I think the new evidence-based funding model is fantastic for all districts. That’s my opinion because we are receiving additional funding for the high-level needs kids.” Her district was able to hire five additional social workers because of additional funding under EBF.

A concern was that some administrators did not feel informed about how the additional funds are to be spent and how to properly report spending to the state. Through Robin was incredibly excited about the implications EBF had for the services she could provide for students, she expressed that “the state is behind in communication and figuring out their process and procedures and expectations. They put this in place, yet they don’t have everything mapped out. As districts, we are guessing.” This finding re-enforces the findings of the University of Illinois study. There is concern about the lack of communication and training from the state on how to respond to the changes in reporting that accompany huge legislative shifts such as EBF.

EBF is a carefully researched and substantive piece of legislation designed to promote equality among school districts in Illinois. Administrators expressed that they were impressed with the benefits EBF had for their districts and communities, meaning that this policy had the respect and attention from those implementing it within schools-- a key component of successful reform. However, the lack of communication and confusion regarding special education reporting hinders EBF's smooth implementation. More communication regarding state expectations for reporting within special education needs to come from the state in order to ensure that administrators can smoothly transition funding formulas.

Discussion

This study is unique. It moves beyond a raw empirical analysis of policy impact, providing insights into the decision-making process of special education administrators as a result of policies. This study synthesizes the voices of administrators who deal with the direct implications of these mandates every day. To restate the purpose of the research: *this study sought to discover how the federal and state mandates give rise to unique special education models across districts and how these mandates impact administrator's decision making regarding the services they can provide for students.*

A key finding of this study was the categorization of unique arrangements of special education models, and how these models are driven by district population, resources, and geographic location. There are Traditional Cooperatives that have school locations, Low Incidence cooperatives that specialize in hiring staff and sending them to districts, and Hybrid Cooperatives that have schools and provide services to districts. Additionally, some districts choose to provide all special education services within their district—typically because they have a large student population that cost justifies hiring full time special education staff. Districts enter and exit cooperative agreements based on their needs.

Another finding is how the inequitable reimbursement for private day school tuition unduly influences what should be cost neutral decision about appropriate placement for special education students. The ILGA's inaction on equalizing the private and public reimbursements-- continuing to provide little to no reimbursement for public placements-- sets districts up to violate the LRE clause of IDEA. Additionally, this policy limits administrator's ability to begin developing programs because neighboring districts would not send their students to a public

program, since they would get no money back. Rural districts are not impacted by this policy to the extent suburban districts are because the private facilities are too far away.

This study also found that the paperwork required for the special education claims and reporting is time consuming and highly technical. Administrators understood the necessity for the time consuming and technical paperwork, but expressed that mandates requiring more paperwork do not fix issues within the school system. For small districts lacking business teams, the claims and reporting processes was particularly burdensome. However, there are opportunities for streamlining across federal and state databases.

Since Illinois mandated that districts submit their own IDEA grants, cooperatives that filled out the grants in the past have been scrambling to communicate with their member districts. This change is creating more paperwork, and though it will not impact students, administrators are using significant time and resources to prepare for an arbitrary, unnecessary funding shift.

This study provides insights into the frustration administrators face when special education is stigmatized. Stigmatization was tied to underfunding and lack of understanding about the unique needs of students. Districts must find the funding to pay for expensive special education services, taking away funds from other programs and initiatives. This is understandably frustrating, but it is not the students or departments fault: these services are supposed receive more federal funding. In addition, when staff and administrators outside of special education do not understand the needs of special education students, they do not have context for why the special education department needs certain costly resources. The combination of these factors leads to special education students being referred to as ‘SPED’ kids as a derogatory term.

Administrators expressed there are not enough qualified applicants for special education teaching positions within Illinois. They are concerned about the quality of education their students are receiving, and the potential liability to staff and students. Administrators cited an inability to offer competitive salaries, lack of incentive from the state for people to become special education teachers, negative views towards the teaching profession, and the absence of a professional community for special educators as explanation for the shortage.

Additionally, this study found that the passage of EBF funding within Illinois has been positive for districts overall, and thereby for special education departments. Districts have hired more staff and are able to budget properly because of reliable payments from the state. However, because five of the eight previous grants for special education have become a part of EBF, administrators did not think they had enough direction from the state on how to properly report expenditures that previously were included in grant reports.

Strengths of this study include speaking to administrators from the breadth of special education models: traditional cooperatives, low incidence cooperatives, hybrid cooperatives, and stand-alone districts. Since the research on this topic is limited, the insight into the frustration and balancing act that results from a lack of communication and outreach is beneficial to informing future policy. Also, understanding unique arrangements and how districts are impacted differently by small policy changes should inform policy within the realm of special education.

A potential limitation of this study is that there were no participants from Region IV, Region VI, or Region VII. However, Region VII is the Chicago Public School system, which is subject to different mechanisms for special education funding than the rest of the state and would require its own study. An additional limitation is that 14 administrators were interviewed,

meaning that there are many experiences and thoughts that are not expressed. Due to the limited number of participants, results cannot be generalized across the state. The administrators interviewed were willing to take time out of their day to speak to a college student: bias may be implicit in the types of individuals who are willing participate in a study like this. If there is a difference between participants and non-participants, the sample may not be representative of the population. Additionally, even though participants were interviewed under the condition of anonymity, they may be reluctant to share the true impact that underfunded mandates have on their daily decision making, if it could be perceived that their districts are not making decisions in the best interest of students.

Continuing research will set the framework for informed policy decisions regarding special education funding. The necessity for continuing research is a policy directive resulting from this study. Some projects that can be derived from this research are as follows:

A study that closely examines the different databases and entities that special education services are reported to and offered recommendations for streamlining. This would help reduce paperwork and help divert efforts to providing services for students. In this study, administrators identified that excess paperwork took up considerable time and resources. They also brought up that there were redundancies in the reporting process which resulted in erroneous data collection. A closer examination would identify what reporting is necessary and inform what paperwork can be eliminated.

A study on the impact of special education funding mandates on the Chicago Public School system would provide the necessary context required to pass mandates that impact all of Illinois. CPS is unique and should be examined as such. However, what happens in CPS has

statewide implications. Understanding the impact of special education funding mandates within CPS is required in order to fully analyze the situation within Illinois.

An examination of current community and stakeholder education about special education students and programming would help identify gaps. This study provided insights into the stigmatization of special education programming from the administrator perspective. Since part of the goal of special education is integrating students into their communities, discovering what communities and stakeholders know about special education students would identify what types of education would bridge the gap and reduce stigmatization. The findings would inform how to best educate those who do not have a direct connection with individuals who are disabled.

Research into precisely why there is a shortage of special education teachers in Illinois would offer solutions for teacher recruitment. Administrators in this study offered some reasons for the shortage, including the inability to offer competitive salaries and the stigmatization of teaching. However, administrators may have a biased view, as they are currently in the profession. Research into the special education teacher shortages would offer informed policy to ensure that there are enough qualified professionals to meet the unique needs of special education students.

Policy Recommendations

The following policy recommendations were derived from this research.

The Federal Government should fully fund IDEA as to the original intent of the legislation. Districts are beholden to mandates that are not funded, which violates the federal government's legal and moral obligation to the rights of students with special needs. The full funding of IDEA will help ensure that students can receive services without putting undue financial pressure on districts, while reducing stigmatization toward special education programming that arises due to insufficient funding.

As of April 8th, 2019, the Trump Administration has proposed holding IDEA funding at the same level it was at in 2018, at 14.7% of the intended 40%. An argument against fully funding IDEA, or beginning to provide more funding for IDEA, is the Trump Administration's commitment to "reduce the federal footprint and cut government agencies." However, the head of the Department of Education Betsy DeVos has come up with a mysterious way to fund costly pet projects: a reimbursement for private and religious schooling capped at \$5 billion and an additional \$60 million to a charter school program. The proposals demonstrate that DOE does not lack funding, but priorities. This study has demonstrated the crippling and inequitable impact the underfunding IDEA has within Illinois. The federal government needs to prioritize meeting its current obligations before it begins siphoning money into pet projects (Strauss, 2018).

Illinois should equalize reimbursement between public and private care options.

Currently, the reimbursement process of providing a full reimbursement for private care facilities and no reimbursement for public placement places incorporates a significant financial burden

into ensuring the students' needs are met in accordance with LRE. This policy has put districts in Illinois in a position to violate the LRE mandate of IDEA. By equalizing reimbursements, Illinois would put administrators, teachers, and families in a position to choose the best option for the student, independent of cost.

In 2010, the study commissioned by the Illinois State Board of Education clearly stated the need to equalize the reimbursement policy. Even though the Illinois Alliance of Administrators of Special Education has prioritized changing this policy in their lobbying efforts, no action has been taken over the past nine years. From the state's perspective, equalizing reimbursements would not cost more: the reimbursements would simply go from strictly private placements to a combination of public and private. The reason why nothing has changed is because the lobby for private, for profit day schools in Springfield is incredibly powerful and has the ear of Democratic legislators. Legislators within Illinois should answer to the inequality they are perpetrating by their lack of action, before the Federal Government does it for them.

To address the shortage of special education administrators in Illinois, financial incentives and increased professional develop needs to move towards prospective special education teachers and specialists. A component of this recommendation is conducting research on why people entering the workforce are choosing not to go into special education within Illinois. This would help to understand what can be done to incentivize people to become special education teachers. Contingent on the results of such research, the necessary programming and incentives will require financial commitment from the state. However, increasing the amount of special education professionals is a way to ensure that students and staff avoid injury. When a staff member or student gets hurt on the job, there is potential for costly legal action.

Additionally, providing these services to students is a mandate under IDEA: ensuring qualified professionals are available falls under the umbrella of federal law.

Training and incentivizing qualified special education professionals is a moral mandate. If a child dies or is hurt because a teacher was not properly trained to handle a situation, the fault is on the system that failed to provide the necessary training and did not prioritize the preparation of that professional. The Illinois General Assembly must be responsible for the educational systems they perpetrate and ensure the safety of students and teachers through proper training and incentives to receive such training.

More research and investment should go into understanding the complexity and unique situations of school districts and regions. This will ensure that policy makers are informed as to how policy impacts the unique agreements that arise to provide special education services. The National Council on Disability cited the necessity for such research: without understanding how special education programming structured and what practices are effective, policymakers and administrators are in the dark as to what changes are appropriate. The IDEA funding shift within Illinois demonstrates how policies passed with no understanding of special education districts can result in wasted time and unnecessary drama. Instead of focusing on districts priorities, special education administrators in impacted cooperatives are now spending time holding sessions with district staff on how to fill out a complicated IDEA grant.

Research is costly and time consuming. However, so are uninformed mandates. To best serve students, substantive, in depth research needs to inform future policy. Within Illinois resources should be put specifically towards fully understanding the districting reporting processes to allow for system consolidation, informing administrators how to properly report

special education services within the framework of the EBF model, and documenting the relationship between districts and cooperatives to inform how to best stream funding.

Conclusion

To bring this research back to the language IDEA: “Disability is a natural part of the human experience and in no way diminishes the right of individuals to participate in or contribute to society.” This law is about ensuring equality of opportunity for individuals so they can contribute their talents and abilities to society. Laws and ruling such as IDEA and *Brown v. Board of Education* affirm the rights of all students to a fully integrated school system that does not discriminate. These values should be acted upon by fully funding the grant that was designed to open the door to integration and opportunity for individuals identified as having unique needs. Currently the law is only a partially fulfilled promise, diminishing American citizens ability to participate in and contribute to society.

Policy must be written to ensure that being different does not diminish the rights of the individual. In order to create a positive impact on the lives of individuals with disabilities and ensure that their education and integration is prioritized—both a legal and moral mandate – the insight of professionals working with these students should inform policy construction and implementation. Bureaucracy and politics should be used to channel progress and inclusion, not inflict an undue burden on the communities, staff, parents, and students.

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Appendices

Appendix A: Recruitment Methods

The special education directors contact list provided by the Illinois State Board of Education provided emails for potential participants. One participant was a superintendent of a small school district but had valuable expertise, as this individual handled much of the special education funding for the district and had previous experience as a special education administrator in Illinois. The individuals interviewed did not know the interviewer personally, and the interviews were conducted over the phone. The study was IRB approved and includes all necessary and recommended protections for research subjects.

Appendix B: Research Invitation Email

The text for my initial research invitation.

Hello Ms./Mr./Dr. (Last Name),

My name is Sarah Wasik and I'm a fourth year college student, originally from Grayslake, IL. I'm working on my B.A. thesis research project, on special education funding allocation and mechanisms in Illinois. To learn more, I'm reaching out to special education administrators across the state. I would love to interview you for this project.

To participate, I would schedule a phone interview at your earliest convenience, and ask you about how (name or number of district) structures special education services, the reimbursement and claims process, and your thoughts on the upcoming shifts in how IDEA funding will be sent to districts. Our conversation would be confidential.

The interview should take about 20-30 minutes, and would be extremely helpful to me as I learn more about special education.

Please let me know if you would be interested in participating!

Best,

Sarah

Appendix C: Interview Questions

Intro: “Thanks again [name] for taking the time to speak with me. I’m trying to learn more about special education and how it is funded in Illinois. The interview is confidential and should take about one hour to complete. If you have any questions or want me to clarify anything, please let me know. Do you have any questions before we start?”

“First, I would like to talk a little bit about your background.”

1. How long have you been working in special education?
2. How long have you been working with District _____?
1. What drew you towards working with these children in particular?
2. Please tell me a little about any kind of benefits to having special education structured the way it is in your district?
3. Can you talk a little bit about why your district chose to go this route?

Probe: How would you say your district compares to others?

4. Can you now tell me a little about any kind of drawbacks or challenges to having special education structured the way it is in your district?

Probe: Why do you think these challenges exist?

5. Has the implementation of the evidence-based funding model in Illinois impacted your programming and resources for your students?
6. Are you anticipating that changes in the flow of IDEA will impact your district? Why or why not?
7. What is your district’s relationship with private care facilities? Private care facilitates are...?

Probe: For example, would you say your district's relationship with private care facilities is? Would you say the relationships are strong, productive, weak, nonexistent etc.? Why do you say that?

8. How would you describe the reimbursement and claims process at the state or federal level?

Probe: Is it reasonable? Logical? Counterintuitive? Why do you say that?

9. Who does the reimbursement and claims processing for your district?

*Will vary based on size and resources of district

10. Please explain the unique needs of your students and your work.

Probe: What kinds of resources do these students need, that someone who does not work in special education, or have a family member or friend in special education may not consider?

11. I have just a couple more questions now. First, do you have any recommendations or thoughts on how funding for special education could be improved?

12. Is there any additional information you think I should know regarding special education, special education funding, or your work and district that you think might be beneficial to this project?

13. Thank you. Do you have any thoughts on other people I should potentially speak to?

“Thank you again for your time and contribution to this research. This has been very helpful!”