



Dear Dr. Myers and Ms. VanName Larson,

I recently read your letter to the editor entitled "RTI and Eligibility Decisions: Another Perspective from Florida." I wanted the opportunity to respond, yet I do not think it is appropriate to continue this dialogue through a third party (the Communiqué) and instead chose to contact you directly. I have attached this letter as a word document if you would rather download the attachment.

The scope of my letter was intended to be limited in nature: RTI in eligibility decision making. Specifically, I was referring to the criteria Matthew Burns and T. Chris Riley-Tillman (and using the July, 2007 FLDOE memo as a supporting document) set out to ensure RTI was implemented prior to using RTI data in eligibility decision making. Several of your responses seemed to address the usage of the Problems Solving/ Response to Intervention (PS/RTI) model as a general education initiative. If it appeared that my letter was addressing the PS/RTI model in general, or the Florida Department of Education's role in promoting it, then I apologize I was not more clear in my writing. The FLDOE has provided trainings and piloting that, from my understanding, have been well received. However, I am unaware of any evidence that counties across the state had the data to show that RTI had been implemented successfully prior to the SLD rule change. And I stand by my statement that the "FLDOE has taken a limited role in advancing the understanding of how to use RTI data in eligibility determination."

You noted in your letter that the Technical Assistance Paper was released and addressed many of the questions that the FLDOE anticipated by districts across the state. You also wrote that the FLDOE had recently completed a series of full-day training throughout the state. I wrote my letter to the editor before the TAP was released and these meetings were held and may have curbed my criticisms slightly if the order were reversed. I do believe the TAP addressed some of the concerns regarding this issue. I do wonder, however, why these trainings were not in conjunction with the other PS/RTI trainings held prior to the SLD rule being changed, especially when you note that the development of the rule language began in 2006.

I read over the Florida Problem Solving/ RTI Project (FPS/RTI) website you mentioned in your letter. The Statewide Training Initiative portion of the site refers to 5 days of trainings that occurred in the 2007-08 school year, followed by quarterly face to face technical assistance and web-based technical assistance. No additional trainings have been mentioned since that date. I'm going to assume the website you promoted is simply not updated, since additional PS/RTI trainings across the state have occurred. Other portions of the website clearly support my statement that some schools in the state are serving as pilots for the PS/RTI model- only 34 schools in seven counties. However, there is no other data from any other school or any other county in the state. Nowhere on the website does it say that other schools or counties have implemented RTI successfully. This would lead me to believe that the majority of counties have not fully implemented RTI or at least have not provided that information to the FPS/RTI Project. Again, this is not a critique of the state-planned PS/RTI training. Rather, it further supports that the implementation of RTI has not yet reached it's total "roll out" goal and makes the SLD rule change premature. There is also no information as to the use of RTI data in eligibility decision making anywhere on the site.

Recently the Broward Association of School Psychology (BASP) along with Broward County Student Services hosted a workshop with Patricia Vickers as one of our guest speakers. Patricia is the Regional RTI Specialist for Region III. She spoke at length about the PS/RTI process and the need for change within our profession. However, there was no mention of eligibility decision making using this process. This is not a critique of Ms. Vickers or her presentation- she stated at the beginning that she was not going to be discussing this issue. Other RTI specialists have made the same disclaimer. One hand of the state has attempted to implement a state-wide training program for the use of RTI –and this should be commended. The other hand of the state has insisted on implementation of an SLD rule before the other hand was done with it's job. That is the point I was trying to make.

Matthew Burns and T. Chris Riley-Tillman summarize Bambi Lockman's July 2007 memo as follows:

“Essentially, schools can use RTI data to make eligibility decisions when they have data to support that an RTI model was implemented, that it was implemented as designed, and that the interventions at all three levels occurred. Until then, schools would better serve their students if they relied on a more traditional discrepancy approach to SLD identification, one that is informed by RTI data, but not made entirely with them.”

While I understand that some counties may be in the position to do this, it is inaccurate to say that the state had provided sufficient training for all counties (and schools within those counties) to accomplish this goal prior to being required to use RTI data in eligibility decision making. Maybe just using the word “training” is inaccurate. They did not provide a method to ensure that this process had been complete. In RTI terms, they did not select a progress monitoring tool to show where each county had started and what criteria would be used to determine sufficient progress. While the trainings were an appropriate intervention, the FLDOE “qualified” the state as being ready despite the lack of data to support such a claim. I stand by my assertion that the FLDOE changed the rule for SLD eligibility before districts and school-based teams will have met the criteria as noted above.

I agree with you on the flaws of the discrepancy model. I appreciate you pointing out the problems of the psychological processing deficit and the district-by-district decision to define what that means. This lead to students “qualifying” in one district and not another, which you correctly state is a problem. Yet, interestingly, you also advocate for districts to now make eligibility decisions based on a “district's unique infrastructure and resources.” Therefore, districts throughout the state may have different definitions and this will inevitably lead to students “qualifying” in one district and not another. In fact, it will likely lead to students “qualifying” in one school but not another school in the same district, given each school's “unique infrastructure and resources.” How could representatives of the support network of the FLDOE point out the flaw with one model and then promote a model that inherently has the same flaw?

This specific component of each district, or schools within a district, basing eligibility decisions on their own “unique infrastructure and resources” is problematic. We seek direction from the FLDOE on this issue and dialogue beyond the theoretical underpinning of the PS/RTI process. Again, I feel that there has not been sufficient direction on this issue and I hope a discussion that will lead to a solution can ensue. I also hope that we have moved past the point where dissenting opinions are dismissed as being opponents of change. Please let me know your thoughts and how your experiences can help solve this problem. My email address is wasserk@bellsouth.net or you can reach me through BASP's website at www.baspfl.org.

Kurt Wasser, Psy.S., NCSP

President, Broward Association of School Psychologists

c: BASP Executive Board