

STATE PERFORMANCE PLAN / ANNUAL PERFORMANCE REPORT: PART B

for STATE FORMULA GRANT PROGRAMS under the Individuals with Disabilities Education Act

**For reporting on
FFY 2024**

Montana



PART B DUE February 2, 2026

**U.S. DEPARTMENT OF EDUCATION
WASHINGTON, DC 20202**

Introduction

Instructions

Provide sufficient detail to ensure that the Secretary and the public are informed of and understand the State's systems designed to drive improved results for students with disabilities and to ensure that the State Educational Agency (SEA) and Local Educational Agencies (LEAs) meet the requirements of IDEA Part B. This introduction must include descriptions of the State's General Supervision System, Technical Assistance System, Professional Development System, Stakeholder Involvement, and Reporting to the Public.

Intro - Indicator Data

Executive Summary

N/A

Additional information related to data collection and reporting

N/A

Number of Districts in your State/Territory during reporting year

398

General Supervision System:

The systems that are in place to ensure that the IDEA Part B requirements are met (e.g., integrated monitoring activities; data on processes and results; the SPP/APR; fiscal management; policies, procedures, and practices resulting in effective implementation; and improvement, correction, incentives, and sanctions). Include a description of all the mechanisms the State uses to identify and verify correction of noncompliance and improve results. This should include, but not be limited to, State monitoring, State database/data system, dispute resolution, fiscal management systems as well as other mechanisms through which the State is able to determine compliance and/or issue written findings of noncompliance. The State should include the following elements:

Describe the process the State uses to select LEAs for monitoring, the schedule, and number of LEAs monitored per year.

At a minimum, once every five years all LEAs and every three years for State Operated programs (i.e. Montana School for the Deaf and Blind, Department of Corrections) or State Supported programs (i.e. Residential treatment facilities, Day Treatment facilities), participate in an Integrated Monitoring System (IMS) review. The IMS schedule for local education agencies (LEAs) is based upon a balanced distribution of districts across the state and Child Count data. Each year approximately 75-80 LEAs are monitored and 1-3 State Operated programs or State Supported programs are monitored. The cycle is dispersed over a 3- or 5-year period and ensures a review of all entities in a timely manner. The IMS schedule is posted on the Montana Office of Public Instruction (OPI) School Improvement website (<https://opi.mt.gov/Portals/182/Page%20Files/Special%20Education/School%20improvement/MonitoringCycle.pdf?ver=2024-09-06-092406-013>).

Approximately 12 months prior to participation in a cyclical monitoring, the administration at the LEAs, State Operated and State Supported programs (henceforth referred to as entity) will receive both written and verbal notification. Administration and the State Education Agency (SEA) staff then work together to determine a date for the active monitoring review. An optional pre-monitoring training is offered and consists of outlining the IMS overall; what is required for compliance; providing details of proper documentation; and recommendations for best practices.

The SEA assigns a lead monitor acting as the primary point of contact with LEA superintendents and special education directors. When an LEA is a member of a special education cooperative, each of the LEA's superintendents and the cooperative director will receive written and verbal notification. When an LEA is participating in a consortium, each of the LEA's superintendents and the consortium director overseeing the consortium receive written and verbal notification.

If the SEA receives information of a credible allegation that suggests a district may not be meeting all the requirements of the IDEA regulations and Montana Administrative Rules, the SEA must conduct due diligence in a timely manner to address the allegation. One way of doing this is to conduct a full or limited off cycle monitoring, referred to as a Field Issues Process (FIP). Examples of information that would be of concern would be findings from a due process or state complaint, fiscal concerns (high-risk status, concerns regarding unallowable costs, etc.), multiple stakeholder calls, media reports, or very poor student performance data.

IDEA Fiscal

The cyclical monitoring and the number of LEAs monitored for fiscal are the same as the ones outlined above in the programmatic monitoring.

As the primary recipient of IDEA Part B federal grants, the SEA is responsible for monitoring the activities of its subrecipients to ensure the subaward is used for authorized purposes and is in compliance with federal and state statutes, regulations, and the terms and conditions of the grant. 2 CFR § 200.332 The monitoring system includes three tiers of compliance: Tier I is universal monitoring that every LEA will complete annually, regardless of the previous year's findings. Tier II is Targeted monitoring which includes the LEAs on the cyclical monitoring schedule. Tier III is Intensive monitoring for which LEAs are selected as result of concerns brought to attention from the risk assessment or alternative methods. Note that Tier III monitoring may be in addition to an LEAs cyclical monitoring (Tier II).

Fiscal Monitoring Selection Process Subrecipients of IDEA federal funds are selected for the fiscal monitoring as follows:

- Cyclical Monitoring – Cohort list (five-year rotation)
- Risk Assessment – LEAs complete risk assessment yearly
- Other – Area(s) of concern identified by the SEA special education fiscal team

Cyclical Monitoring

The cyclical monitoring method will ensure that the SEA monitors all LEAs and subrecipients receiving IDEA Part B 611 and 619 funds at any given point of time in a five-year cycle at a minimum. Within this cyclical monitoring, the SEA special education fiscal team will determine whether the subrecipients are assigned Tier II or Tier III monitoring in addition to the annual Tier I risk assessment. The factors used in making this determination are:

- Risk assessment

- Amount of award (combined 611 & 619)
- Maintenance of Effort
- CCEIS status
- Single audit findings
- Tier I findings
- External considerations brought to the attention of the SEA

All grantees classified as “high risk” in the annual risk assessment will automatically be placed in Tier III monitoring.

Risk Based Monitoring

IDEA Part B administrators perform an annual risk assessment of all LEAs and subrecipients receiving IDEA Part B 611 & 619 funds using the Risk Assessment Tool and rubric (See Appendix B) Risk ratings are established as follows:

Risk Range Level of Monitoring

Low potential of risk 0 – 13 Tier I – Universal

Moderate potential of risk 14 – 30 Tier II – Targeted

High potential of risk 31+ Tier III - Intensive

Any LEA in the cyclical monitoring cycle will receive at least a Tier II monitoring regardless of the results of the risk assessment. The SEA special education fiscal team reserves the right to monitor any LEA at any time for reasons other than those identified in cyclical or risk-based monitoring. Any subrecipient may be scheduled for Tier II or Tier III monitoring based on external findings.

Levels of Monitoring

There are three levels of fiscal monitoring:

- Tier I – Universal Monitoring: Fiscal compliance audit
- Tier II – Targeted Monitoring: Fiscal compliance and process audit
- Tier III – Fiscal compliance, process audit, and on-site or virtual audit

All subrecipients of IDEA federal funds participate in Tier I monitoring annually.

Early Assistance Program (EAP)

Early Assistance Program (EAP) The EAP provides technical assistance to help parents, adult students, guardians, school district staff, advocates and other members of the special education community understand the requirements of IDEA or implementing Montana laws. The EAP provides informal dispute resolution for special education issues relating to a student’s free appropriate public education, any violation of Part B of the IDEA or implementing Montana laws. The intention is to resolve special education disagreements amicably, with the lowest level of third-party involvement possible. In addition to the EAP, there are several other dispute resolution options available under the IDEA, including: Individualized Education Program (IEP) facilitation, mediation, state administrative complaints, due process hearings, and expedited due process hearings. These options are administered and overseen by the EAP staff in collaboration with special education staff.

Describe how student files are chosen, including the number of student files that are selected, as part of the State’s process for determining an LEA’s compliance with IDEA requirements and verifying the LEA’s correction of any identified noncompliance.

Files will be selected by considering the following:

- To the maximum extent possible, files will be chosen from different IDEA eligibility categories
- Grade levels
- Placement (i.e., general education, self-contained, home bound)
- Initial evaluations within the past 24 months
- Evaluation process of students through the Response to Intervention (RtI)
- IEPs developed in the past 12 months
- Extended School Year (ESY)
- Alternative Statewide Assessment
- Secondary Transition IEPs
- Transportation

Additional files will be reviewed for Students With Unique Concerns (SWUCs). SWUCs include students with disabilities who, during the current school year, met one of the areas listed below:

- Transfers
- Surrogate parents
- Parentally placed private school students
- Aversive treatment plans
- Manifestation determination
- Graduated
- Exited
- Not eligible
- Revocation of Consent

- Day Treatment

Describe the data system(s) the State uses to collect monitoring and SPP/APR data, and the period from which records are reviewed.

Data used for Indicators 1, 2, 4, 6, 7, 9, 10, and 17 comes from Montana's Student Information System (SIS), Achievement in Montana (AIM). This system allows school districts to submit required staff, student, and course information electronically. The SIS provides the SEA, the State of Montana, federal entities, and the education community, with timely accurate data used for state and federal reporting. Indicator data from 1, 2, 4, and 17 are lag data and come from the 2023-24 school year. Indicators 6, 7, 9, and 10 data are from the 2024-2025 school year.

Indicator 3 data come from our vendors (Cognia for the Multi-State Alternate Assessment (MSAA), American College Testing (ACT), and Montana Aligned to Standards Through-Year (MAST). The data comes from the 2024-25 school year.

Data for Indicators 5, 11, 12, 13, and 14 comes from the Special Education Applications Portal. This is an internal monitoring and special education data certification application. The data for these indicators from the 2024-25 school year.

Indicator 8 data come from Data Driven Enterprises. Data Driven Enterprises is a research and professional development organization that provides program evaluation, statistical analysis, and data trainings to schools, districts, and state departments of education. The data for this indicator is from the 2024-25 school year.

The data for indicators 15 and 16 is collected from the SY 2024-25 reporting year (July 1, 2024, to June 30, 2025). For Indicator 15, when the SEA receives a Request for Due Process Hearing, the SEA issues a Notice of Filing that in part notifies the parties of the requirements around resolution meetings and the resolution period. The Notice of Filing includes a Due Process Resolution Tracking Form that the public agency is required to fill out. This form tracks whether a resolution meeting was held and if so, the outcome of the resolution meeting and whether it resulted in a written settlement agreement. For Indicator 16, SEA's mediators are required to complete a SEA Mediator Report Form at the conclusion of the mediation. The Mediator Report Form tracks the outcome of the mediation and whether it resulted in a written agreement. For Indicators 15 and 16, the data is collected on an ongoing basis after receipt of one of the aforementioned forms and entered into a table that tracks all of the IDEA required dispute resolution data. The SEA has minimal (less than 10) due processes or mediations each year.

Describe how the State issues findings: by number of instances or by LEAs.

Findings of noncompliance determined through state monitoring systems, dispute resolution systems, and fiscal monitoring systems are issued at the LEA level. For SPP/APR compliance indicators, the findings of noncompliance are currently issued at the instance level.

If applicable, describe the adopted procedures that permit its LEAs to correct noncompliance prior to the State's issuance of a finding (i.e., pre-finding correction).

No pre-finding correction is permitted.

Describe the State's system of graduated and progressive sanctions to ensure the correction of identified noncompliance and to address areas in need of improvement, used as necessary and consistent with IDEA Part B's enforcement provisions, the OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), and State rules.

The SEA may take enforcement actions as part of a corrective action or for noncompliance with a previous corrective action. The Uniform Grant Guidance 2 CFR§200.339 authorizes the SEA to use enforcement mechanisms that may include but are not limited to the following:

- Temporarily withhold cash payments pending correction of the deficiency or more severe enforcement action.
- Disallow all or part of the cost of the activity or action not in compliance.
- Wholly or partly suspend or terminate the federal award.
- Initiate suspension or debarment proceedings.
- Withhold further federal awards for the grant.
- Take other remedies that may be legally available.
- The SEA may deny a grant application for federal funding as an enforcement action.

Describe how the State makes annual determinations of LEA performance, including the criteria the State uses and the schedule for notifying LEAs of their determinations. If the determinations are made public, include a web link for the most recent determinations.

The SEA uses the following data points and information to make annual determinations of LEA performance:

- SPP/APR compliance indicators (4B, 9, 10, 11, 12, 13)
- Timely, complete, and accurate data (based on LEA data submissions and data requests made to LEAs)
- Timely correction of findings of noncompliance (correction of findings of noncompliance within one year of notification)
- Audit findings

The SEA issues annual determinations of performance in four categories using the following criteria:

Meets Requirements

- Substantial compliance on all compliance indicators;
- Data submissions and data requests made to LEAs were timely, complete, and accurate 100% of the time
- Any findings of noncompliance were verified as corrected within one year of notification 100% of the time; AND
- No audit findings

Note: If an LEA does not meet 100% compliance on only one of these Indicators, the SEA will consider the LEA to be "Meet Requirements" if demonstrating a high level of compliance (90% or better).

Needs Assistance

- Compliance percentages of between 75%-89% compliance for one or more of the following components: compliance Indicators 11, 12, and 13; timely, complete, and accurate data; and/or timely correction of findings of noncompliance OR

- Identified as having significant discrepancy but no inappropriate policies, procedures, and practices contributing to the significant discrepancy (Indicator 4B) OR
- Identified as having disproportionate representation but that is not the result of inappropriate identification (Indicators 9 and 10) OR
- One finding of noncompliance not corrected within one year OR
- Identified as high-risk on audit findings for one year

Note: If an LEA is Needs Assistance for two or more consecutive years, the SEA will take one or more of the following actions: advise the LEA of technical assistance that will help the LEA address its areas of need, direct the use of LEA-level funds under Part B on the area(s) where assistance is needed, and identify the LEA as a high-risk grantee and impose special conditions on the LEA's IDEA consolidated grant.

Needs Intervention

- Compliance percentages below 75% compliance for one or more of the following components: compliance Indicators 11, 12, and 13; timely, complete, and accurate data; and/or timely correction of findings of noncompliance OR
- Identified as having significant discrepancy that is the result of inappropriate policies, procedures, and practices (Indicator 4B) OR
- Identified as having disproportionate representation that is the result of inappropriate identification (Indicators 9 and 10) OR
- Failure to demonstrate timely correction of two or more previous findings of noncompliance OR
- Continues to be identified as a high-risk district based on audit findings for two or more consecutive years

Note: If the LEA is identified as Needs Intervention for three consecutive years or more, the SEA shall take one or more of the actions required under 34 CFR 300.604(b): require the LEA to develop a corrective action plan or improvement plan if the SEA determines the LEA should correct the problem in one year; seek to recover funds; withhold, in part or whole, any further payments under Part B of the IDEA; and refer the matter for appropriate enforcement action.

Needs Substantial Intervention

- The failure to substantially comply significantly affects the core requirements of the IDEA, such as the delivery of services to children with disabilities or state exercise of general supervision AND/OR
- The LEA has informed the SEA it is unwilling to comply verbally or through actions or inactions OR
- The LEA has been determined through audit findings to have misspent funds

Note: When the SEA determines that the district needs Substantial Intervention, the SEA shall provide written notice to the Superintendent of Public Instruction of the LEA's failure to comply and take one or more of the following enforcement actions, consistent with 34 CFR 300.604(c): recover funds; withhold, in part or whole, any further payments under Part B of the IDEA; and refer the matter for appropriate enforcement action consistent with state administrative rules and IDEA requirements.

Annual LEA performance determinations are issued in the spring of each school year.

Provide the web link to information about the State's general supervision policies, procedures, and process that is made available to the public.

Integrated Monitoring System:

<https://opi.mt.gov/Portals/182/Page%20Files/Special%20Education/School%20improvement/OPI.IMS%20FINAL.pdf?ver=2024-08-16-180528-947>

Montana Fiscal:

<https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education#10963313030-idea-fiscal>

Dispute Resolution:

<https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education/Dispute-Resolution>

Technical Assistance System:

The mechanisms that the State has in place to ensure the timely delivery of high quality, evidence-based technical assistance, and support to LEAs.

The Special Education Unit is organized into three sub-units that have specific functions and provide technical assistance related to those functions. These units include School Improvement, Continuing Education and Technical Assistance (CETA), and IDEA Part B.

The School Improvement unit provides both broad and specific technical assistance and training related to all aspects of the special education process, proper use and documentation of records, and student specific issues. General technical assistance training and specific LEA technical assistance is provided as requested or required. Annually, staff present at the Montana Council of Administrators of Special Education (MCASE), the Montana Council for Exceptional Children (MCEC), and the fall School Administrators of Montana (SAM) conference. Topics may be determined based on monitoring data, frequently asked questions from the field, questions to the Early Assistance Program (EAP), and special education updates, both nationally and locally.

Technical assistance is also provided to ensure timely correction of all identified noncompliance and training is given related to such non-compliance.

The CETA unit is responsible for implementing several training initiatives for the SEA that focus on instructional practices and interventions. The activities are expanded upon in the Professional Development section.

The IDEA Part B Program unit provides technical assistance to LEA's in applying for, using, and accounting of federal special education funds. Assistance is also provided in developing and implementing program narratives, interlocal agreements, and special education procedures. Data and Accountability staff provide LEAs with technical assistance for all data entry and reporting for required state and federal special education reporting purposes. The early childhood staff collaborate with Part C staff and provide technical assistance as requested on transition from IDEA Part C to IDEA

Part B. The staff also collaborate with other units within the SEA to provide support in early literacy and the Jump Start program. Training is conducted via phone, Zoom, TEAMS and/or in-person, depending on the needs of the LEA.

Technical assistance and updates are regularly provided to directors of special education at conferences and regional Montana Council of Administrators of Special Education (MCASE) meetings. In addition, the SEA staff have areas of expertise that are available to LEA's, as requested for technical assistance and/or training. Such expertise includes former special education teachers with knowledge from preschool classrooms, special education classrooms and inclusion, Speech/Language Pathologists, and former classroom teachers. In addition, the SEA continues to hold monthly special education director calls to provide updates and to discuss current issues related to special education.

Professional Development System:

The mechanisms the State has in place to ensure that service providers have the skills to effectively provide services that improve results for children with disabilities.

Professional development is provided through multiple areas in the Special Education Department. The Continuing Education and Technical Assistance (CETA) and the School Improvement units have integrated responsibilities.

Montana's Comprehensive System of Personnel Development (CSPD) is comprised of pre-monitoring training, regional training opportunities (Regional CSPD), MT Autism Education Project (MAEP), Higher Education Consortium (HEC), Para Pathways Project and stipend programs, State Personnel Development Grant (SPDG), online professional development, and training at conferences. Special Education coordinated the Summer Institute (SI), High School (HS) Forum, and a Special Education Law Conference. Training for general education personnel is supported by the projects above to increase skills to respond to the needs of students with disabilities.

During the 2024-25 school year the monitoring team offered pre-monitoring professional development for LEAs/cooperatives/state-supported programs scheduled for comprehensive monitoring the following school year. PD was provided to special education case-managers, specialists, and administration in both the virtual/onsite formats.

The Regional CSPD structure includes five councils, each led by a regional coordinator, which provide free PD for parents, special and general educators, and paraprofessionals. The regional coordinators meet monthly with the SEA as the statewide CSPD council. The SEA provides an annual report to each council with indicator data, trends in monitoring, and evaluation data for all Regional CSPD training. The councils analyze the data to align their activities to the APR indicators and direct PD toward improving student outcomes. The statewide priority training topic this year was mathematics. In 2024-25, Regional CSPDs hosted 124 in-person and virtual training events with 3245 attendees.

Educating students with autism and related disabilities requires specific skills and knowledge. The goals of the SEA's Montana Autism Education Project (MAEP) are to: 1) Increase district-level capacity to educate neurodiverse learners through training, consultation and coaching, peer-to-peer collaboration, and a virtual library with resources, research, and field tools for educators; 2) develop interagency collaboration between the SEA, school districts, Part C agency providers, Department of Public Health and Human Services, the MEC, and Institutes of Higher Education (IHE). The MAEP offers free consultations for public school students who qualify for services under the IDEA. Board certified behavior analysts and speech-language pathologists (SLP) are among the part-time consultants at the SEA. During the 2024-25 school year, the MAEP provided 57 unique training opportunities, 7 scholarship opportunities, and 4 lectures with the MT University systems, for a total of 68 professional development offerings. These trainings were attended by 1,014 Montana educators, parents, and others who have an interest in autism, neurodiverse learning, and behavior management. Topics included assessment, data collection and conceptualization, behavior management, augmentative and alternative communication, and effective systems of intervention.

The SEA meets with representatives of all Montana educator preparation programs to improve preservice instruction through our Higher Education Consortium (HEC). The HEC meets twice annually to discuss critical issues and collaborate. The meetings create a strong partnership between faculty members and the SEA. The fall 2024 meeting had presentations and guided discussion on indigenous ways of knowing, literacy, and an innovative educator preparation charter school model. The spring 2025 meeting included presentations/discussions on early childhood, assessment, dual enrollment and 2+2 grow your own teacher preparation programs, and resources from the National Native Children's Trauma Center.

After collaborations at HEC, we launched the Para Pathways Project in early 2025, with access for both paraeducators and licensed educators to take modules in special education online through LRP Direct Step. Special Education paraeducators are incentivized to take 40 modules for PPP Level 1. PPP Level 2, which began fall 2025, provides tuition support for paras in 4 college courses in education.

The OPI Teacher Learning Hub provides free, accessible, high-quality online learning. Special Education offered 17 courses on the Hub in 2024-25 on topics such as transitions, instruction, compliance, deafblindness, twice exceptional, braille, assistive technology, MTSS, high leverage practices, and 3 courses designed for paraeducators. There is also a 9-hour series on Dyslexia.

This was MT's fifth year of the 2020 SPDG: Montana's Tiered System of Supports. The SPDG provides coaching support to increase district capacity to implement a system-level problem-solving approach. The 2024-2025 school year focused on completing all 11 Building Implementation Team (BIT) online modules and intensively supporting 16 districts. We also added a targeted coaching pilot that supported 7 combined District/Building Implementation Teams in CSPD Region III. All 21 SPDG modules are complete with coaching guides. Our new 2025 SPDG will continue to support Integrated MTSS, provide training in Data-Based Individualization, and provide stipends to paras to become fully certified special education teachers for PPP Level 3.

OPI Special Education sponsors stipend programs to support public school districts and cooperatives to fill vacant special education and related services positions. OPI provides financial support to candidates admitted to the following stipend programs: SPED Endorsement Project, SLP Traineeship, School Psychology Traineeship, and the Occupational Therapist (OT) Traineeship. Candidates in the SPED Endorsement Project are hired under the Administrative Rules of Montana (A.R.M.) that allows for an educator holding a current MT educator license to be hired as a paid intern in Special Education. The paid intern enrolls at a MT IHE to obtain their Special Education endorsement within 3 years. The OPI provides supportive mentoring for the paid interns in the SPED Endorsement Project. This mentoring is ongoing and covers TA/PD in SPED topics and student/educator well-being. Candidates in the SLP, School Psych, and OT programs are university students attending courses full time and they do not hold jobs in public schools or cooperatives until licensed.

The Summer Institute (SI) and High School (HS) Forum events provided PD to general and special education faculty. Sessions are targeted at all tiers to meet the needs of all students, including SWD and tribal students. HS Forum was held in November 2024 promoting the use of MTSS for academics, behavior, and mental health at the secondary level with 123 attendees at 18 sessions. The SI provided 4 days of PD in June 2025 with a focus on PK-12 special education, MTSS, EBPs, PBIS, IEFA, and mental health. The 2025 SI included 131 sessions for 545 attendees. In September 2024, the OPI partnered with TAESE to host a 2-day regional special education Law Conference with 118 attendees.

Special education staff collaborate with the Indian Education for All (IEFA) unit on the development and delivery of professional development to meet the unique needs of Montana's American Indian students. The IEFA staff are partners on SI, HS Forum, and HEC providing relevant sessions to ensure the OPI addresses cultural and linguistic responsiveness and tribal student achievement.

Special education staff presented at the Montana Council for Exceptional Children (MCEC) and Montana Council for Administrators of Special Education (MCASE) Conferences, as well as other events. Additionally, our early childhood special education specialist provided multiple regional sessions in partnership with Part C and Head Start.

Stakeholder Engagement:

The mechanisms for broad stakeholder engagement, including activities carried out to obtain input from, and build the capacity of, a diverse group of parents to support the implementation activities designed to improve outcomes, including target setting and any subsequent revisions to targets, analyzing data, developing improvement strategies, and evaluating progress.

The Special Education Advisory Panel (SEAP) in Montana has been in existence since 2013. The SEAP is made up of 16 members, seven of whom are parents of students with disabilities. The panel is fully vested and broadly representative of Montana. Many of the panel members serve in other agency or organization leadership positions or on advisory councils as the voice of students with disabilities. This enables the SEA to draw insight and advice from a diverse group of stakeholders with an understanding of Montana's unique needs and strengths.

In the 2024-25 and 2025-26 school years, the SEA asked for input on Indicators 3, 4, 9, and 10 from the SEAP. The SEA presented information on the SPP/APR as a whole and then dug into the specific indicators for feedback on targets and proposed methodological changes. The SEAP agreed with the SEA's proposal. Meeting minutes from discussions with SEAP as well as presentation materials have been posted publicly for all stakeholder review and input on the state website for SEAP: <https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education/Regulations-and-Guidance#10965413037-federal-requirements>.

In the spring of every school year, the SEA brings together parents, Montana's Parent Training and Information center the Montana Empowerment Center (MEC), the SEAP, and other state agencies for a joint partnership meeting. During this meeting the SEA reviews the APR submitted in February. The SEA asks for suggestions on how to potentially improve the outcomes of the indicators along with doing a data drill down of the state data and district level data.

In addition to the above-mentioned stakeholders, the SEA worked with many other stakeholder groups that support students with disabilities. Those groups include but are not limited to:

Monthly Special Education Director's calls

Montana Council for Exceptional Children (MCEC) – presented on updates at the SEA, national level, and writing compliant special education paperwork
Vocational Rehabilitation and Blind Services – strengthening our secondary transition

Summer Institute

Montana Council of Administrators of Special Education (MCASE)

Higher Education Consortium (HEC)

Dawson Community College – assisted in setting up level 2 of the ParaPathways Program

CSPD Regional Directors

Montana Empowerment Center – Monthly meetings

Disability Rights Montana

Apply stakeholder engagement from introduction to all Part B results indicators (y/n)

YES

Number of Parent Members:

7

Parent Members Engagement:

Describe how the parent members of the State Advisory Panel, parent center staff, parents from local and statewide advocacy and advisory committees, and individual parents were engaged in setting targets, analyzing data, developing improvement strategies, and evaluating progress.

The State Advisory Panel has a diverse group of participants from across the state. The panel meets four times a year. These meetings include opportunities for engagement in reviewing and setting (if applicable) targets, analyzing data at the state level, and developing improvement strategies and recommendations for the State Superintendent. During the 2024-25 school year, the SEA met on a monthly basis (to the best of ability), with Disability Rights Montana (DRM), and monthly with the parent training and information center, MEC.

Activities to Improve Outcomes for Children with Disabilities:

The activities conducted to increase the capacity of diverse groups of parents to support the development of implementation activities designed to improve outcomes for children with disabilities.

The SEA holds the SEAP four times a year. The final meeting of the year includes stakeholders from around the state including parents from MEC, other state agencies who work with children, students, and adults with disabilities. At the final meeting of the year, the stakeholders look at the data from the APR and Data Driven Enterprises does a state level drill down of the indicators to present. Once the data has been presented, the stakeholder have the opportunity to discuss the data with their table mates. They're asked to provide feedback, suggestions for improvement, and ask questions.

In addition, the SEA sends communications about the SPP/APR through a listserv and newsletter to make stakeholders aware of information and provide them with resources to increase their capacity. This allows them to provide informed input, feedback, and ask questions as needed. Also, the SEA posts the topics of discussion and meeting notes online, where the public, including parents, can access the information being provided in these meetings for more information.

Soliciting Public Input:

The mechanisms and timelines for soliciting public input for setting targets, analyzing data, developing improvement strategies, and evaluating progress.

The APR was presented to the Advisory Panel in January of 2025. It was explained to the advisory panel that the SEA was presenting changes to Indicators 3, 6C, 8, and 18. In late 2025, the SEA presented on the SPP/APR and sought specific input on processes, calculations, and targets for indicators 3, 4, 9, and 10. Details about the input received from the Advisory Panel are documented in the meeting minutes and materials posted on the state's Advisory Panel website. This panel's information can be found under the "Federal Requirements" section on the state website (<https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education/Regulations-and-Guidance#11191313088-annual-performance-report>),

Throughout each school year, stakeholders and members of the public have the ability to provide input on SPP/APR targets, the analysis of the publicly shared data, suggested improvement strategies that will result in improved outcomes for students with disabilities and evaluation of state progress and LEA progress towards state targets. During the third quarter meeting with the SEAP, the SEA shares the data of the most recently submitted APR. This information is shared either in an in-person or virtual meeting depending on the weather.

Making Results Available to the Public:

The mechanisms and timelines for making the results of the target setting, data analysis, development of the improvement strategies, and evaluation available to the public.

The meeting minutes from the SEAP can be found here: <https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education/Regulations-and-Guidance#10965413037-federal-requirements>. During the third quarter meeting with the SEAP, the SEA shares the data of the most recently submitted APR. This information is shared either in an in-person or virtual meeting depending on the weather.

Reporting to the Public

How and where the State reported to the public on the FFY 2023 performance of each LEA located in the State on the targets in the SPP/APR as soon as practicable, but no later than 120 days following the State's submission of its FFY 2023 APR, as required by 34 CFR §300.602(b)(1)(i)(A); and a description of where, on its Web site, a complete copy of the State's SPP/APR, including any revisions if the State has revised the targets that it submitted with its FFY 2023 APR in 2025, is available.

A report of the FFY 2023 performance of each LEA on the targets for SPP/APR indicators can be accessed directly via the following link: <https://opi.mt.gov/Portals/182/Page%20Files/Special%20Education/IDEA%20Data/Public%20Reporting%20Suppressed.xlsx?ver=2024-08-13-080405-260>.

The FFY 2023 performance of each LEA on the targets for SPP/APR indicators will be posted within 120 days of the February 2, 2026, submission of the SPP/APR and will be available on the following website: <https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education/Special-Education-Annual-Performance-Report#10963313031-idea-data>. To access the link, click on "IDEA Data" and find the link to the publicly reported data under the "Public Reporting of IDEA Data" header.

A complete copy of the state's SPP/APR will be posted on the state website via the following link: <https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education/Regulations-and-Guidance#11191313088-annual-performance-report>.

Intro - Prior FFY Required Actions

The State's IDEA Part B determination for both 2024 and 2025 is Needs Assistance. In the State's 2025 determination letter, the Department advised the State of available sources of technical assistance, including OSEP-funded technical assistance centers, and required the State to work with appropriate entities. The Department directed the State to determine the results elements and/or compliance indicators, and improvement strategies, on which it will focus its use of available technical assistance, in order to improve its performance. The State must report, with its FFY 2024 SPP/APR submission, due February 1, 2026, on: (1) the technical assistance sources from which the State received assistance; and (2) the actions the State took as a result of that technical assistance.

Response to actions required in FFY 2023 SPP/APR

During the 2024-25 school year, the SEA worked with several OSEP-funded technical assistance centers including, DCASD, NCSI, IDC, CIFR, and NTACT. These five centers worked with the SEA to improve their general supervision system, including IDEA data requirements, IDEA fiscal requirements, and IDEA programming.

The SEA worked with NCSI to assist in answering general supervision questions. They supported the SEA with improvements and revisions to the IMS process, based on feedback provided by LEAs. The action the SEA took based on this support from NCSI was editing and improving the state Integrated Monitoring System (IMS) manual.

CIFR assisted the SEA in improving the fiscal monitoring system put in place the 2024-25 school year. Changes were made to the system after receiving feedback from special education directors (stakeholders). CIFR also continued to support the SEA IDEA Fiscal Manager with fiscal questions through weekly and then bi-weekly zoom meetings. The action the SEA took based on this support from CIFR was to make changes to the fiscal monitoring process and manual.

For the last two years, DCASD supported the SEA in fleshing out processes and systems related to the significant disproportionality calculations and associated requirements (e.g., CCEIS, PPP reviews). In FFY 2024, they continued to assist the SEA with improving state and LEA manuals around significant disproportionality. DCASD met with the SEA bi-weekly and eventually monthly on manuals and significant disproportionality questions. The team also attended many of the calls and webinars DCASD had to offer. Several representatives from DCASD came to our Summer Institute in June of 2025 to present significant disproportionality in conjunction with other SEA staff. The action taken by the SEA was updating SEA and LEA manuals related to significant disproportionality. This has improved the SEA's communication with the LEAs on significant disproportionality.

The SEA continued work with IDC for data specific concerns as the IDEA Part B manager was relatively new. The state data manager also attended in-person conferences hosted by IDC to stay informed about IDEA data and reporting requirements. The action the SEA took was continued communication with IDC staff through email and zoom or teams and attendance at conferences and relevant webinars.

NTACT worked with the SEA's secondary transition coordinator to improve the SEA's transition binder and additional resources. The SEA had two special education staff part of the Capacity Building Institute (CBI) in addition to staff from the Department of Health and Human Services (DPHHS). Joint trainings with DPHHS were completed for LEAs.. This allowed the LEAs to see what was also available after high school and how and when to start incorporating these services early in the transition process. Staff attended all in-person conferences, zoom meetings. The action the SEA took was to continue to hold meetings with DPHHS regularly. This was to continue to work on improving the processes during and after high school along with resources available to the LEAs.

Intro - OSEP Response

The State's determinations for both 2024 and 2025 were Needs Assistance. Pursuant to Section 616(e)(1) of the IDEA and 34 C.F.R. § 300.604(a), OSEP's June 20, 2025 determination letter informed the State that it must report with its FFY 2024 SPP/APR submission, due February 2, 2026, on: (1) the technical assistance sources from which the State received assistance; and (2) the actions the State took as a result of that technical assistance. The State provided the required information.

Intro - Required Actions

The State's IDEA Part B determination for both 2025 and 2026 is Needs Assistance. In the State's 2026 determination letter, the Department advised the State of available sources of technical assistance, including OSEP-funded technical assistance centers, and required the State to work with appropriate entities. The Department directed the State to determine the results elements and/or compliance indicators, and improvement strategies, on which it will focus its use of available technical assistance, in order to improve its performance. The State must report, with its FFY 2025 SPP/APR submission, due February 1, 2027, on: (1) the technical assistance sources from which the State received assistance; and (2) the actions the State took as a result of that technical assistance

Indicator 1: Graduation

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results indicator: Percent of youth with Individualized Education Programs (IEPs) exiting special education due to graduating with a regular high school diploma. (20 U.S.C. 1416 (a)(3)(A))

Data Source

Same data as used for reporting to the Department under section 618 of the Individuals with Disabilities Education Act (IDEA), using the definitions in EDFacts file specification FS009.

Measurement

States must report a percentage using the number of youth with IEPs (ages 14-21) who exited special education due to graduating with a regular high school diploma in the numerator and the number of all youth with IEPs who exited high school (ages 14-21) in the denominator.

Instructions

Sampling is not allowed.

Data for this indicator are “lag” data. Describe the results of the State’s examination of the data for the year before the reporting year (e.g., for the FFY 2024 SPP/APR, use data from 2023-2024), and compare the results to the target.

Include in the denominator the following exiting categories: (a) graduated with a regular high school diploma; (b) graduated with a state-defined alternate diploma; (c) received a certificate; (d) reached maximum age; or (e) dropped out.

Do not include in the denominator the number of youths with IEPs who exited special education due to: (a) transferring to regular education; or (b) who moved but are known to be continuing in an educational program.

Provide a narrative that describes the conditions youth must meet in order to graduate with a regular high school diploma. If the conditions that youth with IEPs must meet in order to graduate with a regular high school diploma are different, please explain.

1 - Indicator Data

Historical Data

Baseline Year	Baseline Data
2020	78.65%

FFY	2019	2020	2021	2022	2023
Target >=	82.90%	76.00%	77.00%	78.00%	79.00%
Data	78.03%	78.65%	73.73%	69.69%	69.22%

Targets

FFY	2024	2025
Target >=	78.65%	80.00%

Targets: Description of Stakeholder Input

The Special Education Advisory Panel (SEAP) in Montana has been in existence since 2013. The SEAP is made up of 16 members, seven of whom are parents of students with disabilities. The panel is fully vested and broadly representative of Montana. Many of the panel members serve in other agency or organization leadership positions or on advisory councils as the voice of students with disabilities. This enables the SEA to draw insight and advice from a diverse group of stakeholders with an understanding of Montana’s unique needs and strengths.

In the 2024-25 and 2025-26 school years, the SEA asked for input on Indicators 3, 4, 9, and 10 from the SEAP. The SEA presented information on the SPP/APR as a whole and then dug into the specific indicators for feedback on targets and proposed methodological changes. The SEAP agreed with the SEA’s proposal. Meeting minutes from discussions with SEAP as well as presentation materials have been posted publicly for all stakeholder review and input on the state website for SEAP: <https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education/Regulations-and-Guidance#10965413037-federal-requirements>.

In the spring of every school year, the SEA brings together parents, Montana’s Parent Training and Information center the Montana Empowerment Center (MEC), the SEAP, and other state agencies for a joint partnership meeting. During this meeting the SEA reviews the APR submitted in February. The SEA asks for suggestions on how to potentially improve the outcomes of the indicators along with doing a data drill down of the state data and district level data.

In addition to the above-mentioned stakeholders, the SEA worked with many other stakeholder groups that support students with disabilities. Those groups include but are not limited to:
Monthly Special Education Director’s calls
Montana Council for Exceptional Children (MCEC) – presented on updates at the SEA, national level, and writing compliant special education paperwork
Vocational Rehabilitation and Blind Services – strengthening our secondary transition

Summer Institute

Dawson Community College – assisted in setting up level 2 of the ParaPathways Program

CSPD Regional Directors
Montana Empowerment Center – Monthly meetings
Disability Rights Montana

Prepopulated Data

Source	Date	Description	Data
SY 2023-24 Children with Disabilities (IDEA) Exiting Special Education (EDFacts file spec FS009; Data group 85)	03/05/2025	Number of youth with IEPs (ages 14-21) who exited special education by graduating with a regular high school diploma (a)	924
SY 2023-24 Children with Disabilities (IDEA) Exiting Special Education (EDFacts file spec FS009; Data group 85)	03/05/2025	Number of youth with IEPs (ages 14-21) who exited special education by graduating with a state-defined alternate diploma (b)	
SY 2023-24 Children with Disabilities (IDEA) Exiting Special Education (EDFacts file spec FS009; Data group 85)	03/05/2025	Number of youth with IEPs (ages 14-21) who exited special education by receiving a certificate (c)	70
SY 2023-24 Children with Disabilities (IDEA) Exiting Special Education (EDFacts file spec FS009; Data group 85)	03/05/2025	Number of youth with IEPs (ages 14-21) who exited special education by reaching maximum age (d)	1
SY 2023-24 Children with Disabilities (IDEA) Exiting Special Education (EDFacts file spec FS009; Data group 85)	03/05/2025	Number of youth with IEPs (ages 14-21) who exited special education due to dropping out (e)	358

FFY 2024 SPP/APR Data

Number of youth with IEPs (ages 14-21) who exited special education due to graduating with a regular high school diploma	Number of all youth with IEPs who exited special education (ages 14-21)	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
924	1,353	69.22%	78.65%	68.29%	Did not meet target	No Slippage

Graduation Conditions

Provide a narrative that describes the conditions youth must meet in order to graduate with a regular high school diploma.

The Montana Board of Public Education has set the following as the minimum graduation requirements for all Montana students. Each local school board has the option to add additional requirements and most choose to add more rigorous requirements that all students in their district must meet. In some cases, this may result in a special education student needing to spend more than 4 years working towards their high school diploma. It can create a barrier to graduation for students who transfer to or from one Montana High School to another with more rigorous graduation standards.

10.55.905: GRADUATION REQUIREMENTS - Administrative Rules of the State of Montana

10.55.905 GRADUATION REQUIREMENTS

(1) As a minimum, a school district's requirements for graduation shall include a total of 20 units of study that enable all students to meet the content standards and content-specific grade-level or grade-band learning progressions. Students may demonstrate achievement through a flexible system of pupil-centered learning.

(2) In order for students to graduate, they must meet the content and performance standards. The following 13 units shall be part of the 20 units. The required units may be satisfied by an equivalent course that meets the district's curriculum and assessment requirements, which are aligned with each of the content standards:

- (a) 4 units of English language arts;
- (b) 2 units of mathematics;
- (c) 2 units of social studies (including a 1/2 unit of Civics or Government);
- (d) 2 units of science;

- (e) 1 unit of health and physical education;
 - (f) 1 unit of arts;
 - (g) 1 unit of career and technical education; and
 - (h) 1/2 unit of economics or financial literacy within the 2 units of social studies, the 2 units of mathematics, or the 1 unit of career and technical education.
- (3) Units of credit earned in any Montana high school accredited by the Board of Public Education shall be accepted by all Montana high schools.
- (4) In accordance with the policies of the local board of trustees, students may be graduated from high school with less than four years enrollment.

Rule History

NEW, 1989 MAR p. 342, Eff. 7/1/89; AMD, 1998 MAR p. 2707, Eff. 10/9/98; AMD, 2000 MAR p. 3340, Eff. 12/8/00; AMD, 2012 MAR p. 2042, Eff. 7/1/13; AMD, 2023 MAR p. 255, Eff. 7/1/23.

Are the conditions that youth with IEPs must meet to graduate with a regular high school diploma different from the conditions noted above? (yes/no)

NO

Provide additional information about this indicator (optional)

N/A

1 - Prior FFY Required Actions

None

1 - OSEP Response

1 - Required Actions

Indicator 2: Drop Out

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results indicator: Percent of youth with IEPs who exited special education due to dropping out. (20 U.S.C. 1416 (a)(3)(A))

Data Source

Same data as used for reporting to the Department under section 618 of the Individuals with Disabilities Education Act (IDEA), using the definitions in ED²Facts file specification FS009.

Measurement

States must report a percentage using the number of youth with IEPs (ages 14-21) who exited special education due to dropping out in the numerator and the number of all youth with IEPs who exited special education (ages 14-21) in the denominator.

Instructions

Sampling is not allowed.

Data for this indicator are "lag" data. Describe the results of the State's examination of the section 618 exiting data for the year before the reporting year (e.g., for the FFY 2024 SPP/APR, use data from 2023-2024), and compare the results to the target.

Include in the denominator the following exiting categories: (a) graduated with a regular high school diploma; (b) graduated with a state-defined alternate diploma; (c) received a certificate; (d) reached maximum age; or (e) dropped out.

Do not include in the denominator the number of youths with IEPs who exited special education due to: (a) transferring to regular education; or (b) who moved but are known to be continuing in an educational program.

Provide a narrative that describes what counts as dropping out for all youth. Please explain if there is a difference between what counts as dropping out for all students and what counts as dropping out for students with IEPs.

2 - Indicator Data

Historical Data

Baseline Year	Baseline Data
2020	21.26%

FFY	2019	2020	2021	2022	2023
Target <=	3.40%	21.26%	21.16%	21.06%	20.96%
Data	3.81%	21.26%	20.61%	25.85%	26.44%

Targets

FFY	2024	2025
Target <=	20.86%	20.76%

Targets: Description of Stakeholder Input

The Special Education Advisory Panel (SEAP) in Montana has been in existence since 2013. The SEAP is made up of 16 members, seven of whom are parents of students with disabilities. The panel is fully vested and broadly representative of Montana. Many of the panel members serve in other agency or organization leadership positions or on advisory councils as the voice of students with disabilities. This enables the SEA to draw insight and advice from a diverse group of stakeholders with an understanding of Montana's unique needs and strengths.

In the 2024-25 and 2025-26 school years, the SEA asked for input on Indicators 3, 4, 9, and 10 from the SEAP. The SEA presented information on the SPP/APR as a whole and then dug into the specific indicators for feedback on targets and proposed methodological changes. The SEAP agreed with the SEA's proposal. Meeting minutes from discussions with SEAP as well as presentation materials have been posted publicly for all stakeholder review and input on the state website for SEAP: <https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education/Regulations-and-Guidance#10965413037-federal-requirements>.

In the spring of every school year, the SEA brings together parents, Montana's Parent Training and Information center the Montana Empowerment Center (MEC), the SEAP, and other state agencies for a joint partnership meeting. During this meeting the SEA reviews the APR submitted in February. The SEA asks for suggestions on how to potentially improve the outcomes of the indicators along with doing a data drill down of the state data and district level data.

In addition to the above-mentioned stakeholders, the SEA worked with many other stakeholder groups that support students with disabilities. Those groups include but are not limited to:

Monthly Special Education Director's calls

Montana Council for Exceptional Children (MCEC) – presented on updates at the SEA, national level, and writing compliant special education paperwork

Vocational Rehabilitation and Blind Services – strengthening our secondary transition

Summer Institute

Montana Council of Administrators of Special Education (MCASE)

Prepopulated Data

Source	Date	Description	Data
SY 2023-24 Children with Disabilities (IDEA) Exiting Special Education (EDFacts file spec FS009; Data group 85)	03/05/2025	Number of youth with IEPs (ages 14-21) who exited special education by graduating with a regular high school diploma (a)	924
SY 2023-24 Children with Disabilities (IDEA) Exiting Special Education (EDFacts file spec FS009; Data group 85)	03/05/2025	Number of youth with IEPs (ages 14-21) who exited special education by graduating with a state-defined alternate diploma (b)	
SY 2023-24 Children with Disabilities (IDEA) Exiting Special Education (EDFacts file spec FS009; Data group 85)	03/05/2025	Number of youth with IEPs (ages 14-21) who exited special education by receiving a certificate (c)	70
SY 2023-24 Children with Disabilities (IDEA) Exiting Special Education (EDFacts file spec FS009; Data group 85)	03/05/2025	Number of youth with IEPs (ages 14-21) who exited special education by reaching maximum age (d)	1
SY 2023-24 Children with Disabilities (IDEA) Exiting Special Education (EDFacts file spec FS009; Data group 85)	03/05/2025	Number of youth with IEPs (ages 14-21) who exited special education due to dropping out (e)	358

FFY 2024 SPP/APR Data

Number of youth with IEPs (ages 14-21) who exited special education due to dropping out	Number of all youth with IEPs who exited special education (ages 14-21)	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
358	1,353	26.44%	20.86%	26.46%	Did not meet target	No Slippage

Provide a narrative that describes what counts as dropping out for all youth

The dropout definition for all students in the state of Montana is:

Dropouts are the count of individuals who: were enrolled in school on the date of the previous year October enrollment count or at some time during the previous school year and were not enrolled on the date of the current school year October count, or were not enrolled at the beginning of the previous school year but were expected to enroll and did not re-enroll during the year, “no show”, and were not enrolled on the date of the current school year October count, and have not graduated from high school or completed a state or district-approved high school educational program, and have not transferred to another school, been temporarily absent due to a school-recognized illness or suspension or died.

Is there a difference in what counts as dropping out for youth with IEPs? (yes/no)

YES

If yes, explain the difference in what counts as dropping out for youth with IEPs.

Dropouts for Indicator 2 are counted based on the requirements in the EDFacts File specifications for FS009: Dropped Out

These students were enrolled at the start of the reporting period but were not enrolled at the end of the reporting period and did not exit special education through any of the other means. This includes dropouts, runaways, GED recipients (in cases where students are required to drop out of the secondary educational program to pursue the GED certificate), expulsions, status unknown, students who moved but are not known to be continuing in another educational program, and other exiters from special education.

Provide additional information about this indicator (optional).

N/A

2 - Prior FFY Required Actions

None

2 - OSEP Response

2 - Required Actions

Indicator 3A: Participation for Children with IEPs

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results indicator: Participation and performance of children with IEPs on statewide assessments:

- A. Participation rate for children with IEPs.
- B. Proficiency rate for children with IEPs against grade level academic achievement standards.
- C. Proficiency rate for children with IEPs against alternate academic achievement standards.
- D. Gap in proficiency rates for children with IEPs and all students against grade level academic achievement standards.

(20 U.S.C. 1416 (a)(3)(A))

Data Source

3A. Same data as used for reporting to the Department under Title I of the ESEA, using EDFacts file specifications FS185 and 188.

Measurement

A. Participation rate percent = [(# of children with IEPs participating in an assessment) divided by the (total # of children with IEPs enrolled during the testing window)]. Calculate separately for reading and math. Calculate separately for grades 4, 8, and high school. The participation rate is based on all children with IEPs, including both children with IEPs enrolled for a full academic year and those not enrolled for a full academic year.

Instructions

Describe the results of the calculations and compare the results to the targets. Provide the actual numbers used in the calculation.

Include information regarding where to find public reports of assessment participation and performance results, as required by 34 C.F.R. §300.160(f), i.e., a link to the Web site where these data are reported.

Indicator 3A: Provide separate reading/language arts and mathematics participation rates for children with IEPs for each of the following grades: 4, 8, & high school. Account for ALL children with IEPs, in grades 4, 8, and high school, including children not participating in assessments and those not enrolled for a full academic year. Only include children with disabilities who had an IEP at the time of testing.

3A - Indicator Data

Historical Data:

Subject	Group	Group Name	Baseline Year	Baseline Data
Reading	A	Grade 4	2024	98.46%
Reading	B	Grade 8	2024	96.34%
Reading	C	Grade HS	2018	81.38%
Math	A	Grade 4	2024	98.74%
Math	B	Grade 8	2024	96.94%
Math	C	Grade HS	2018	85.68%

Targets

Subject	Group	Group Name	2024	2025
Reading	A >=	Grade 4	95.00%	95.00%
Reading	B >=	Grade 8	95.00%	95.00%
Reading	C >=	Grade HS	95.00%	95.00%
Math	A >=	Grade 4	95.00%	95.00%
Math	B >=	Grade 8	95.00%	95.00%
Math	C >=	Grade HS	95.00%	95.00%

Targets: Description of Stakeholder Input

The Special Education Advisory Panel (SEAP) in Montana has been in existence since 2013. The SEAP is made up of 16 members, seven of whom are parents of students with disabilities. The panel is fully vested and broadly representative of Montana. Many of the panel members serve in other agency or organization leadership positions or on advisory councils as the voice of students with disabilities. This enables the SEA to draw insight and advice from a diverse group of stakeholders with an understanding of Montana's unique needs and strengths.

In the 2024-25 and 2025-26 school years, the SEA asked for input on Indicators 3, 4, 9, and 10 from the SEAP. The SEA presented information on the SPP/APR as a whole and then dug into the specific indicators for feedback on targets and proposed methodological changes. The SEAP agreed with the SEA's proposal. Meeting minutes from discussions with SEAP as well as presentation materials have been posted publicly for all stakeholder review and input on the state website for SEAP: <https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education/Regulations-and-Guidance#10965413037-federal-requirements>.

In the spring of every school year, the SEA brings together parents, Montana's Parent Training and Information center the Montana Empowerment Center (MEC), the SEAP, and other state agencies for a joint partnership meeting. During this meeting the SEA reviews the APR submitted in February. The SEA asks for suggestions on how to potentially improve the outcomes of the indicators along with doing a data drill down of the state data and district level data.

In addition to the above-mentioned stakeholders, the SEA worked with many other stakeholder groups that support students with disabilities. Those groups include but are not limited to:

Monthly Special Education Director's calls

Montana Council for Exceptional Children (MCEC) – presented on updates at the SEA, national level, and writing compliant special education paperwork

Vocational Rehabilitation and Blind Services – strengthening our secondary transition

Summer Institute

Montana Council of Administrators of Special Education (MCASE)

Higher Education Consortium (HEC)

Dawson Community College – assisted in setting up level 2 of the ParaPathways Program

CSPD Regional Directors

Montana Empowerment Center – Monthly meetings

Disability Rights Montana

In FFY 2023, Montana allowed LEAs to opt into administration of a new field through-year assessment for students grades 3-8 in mathematics and ELA who are required to take the statewide summative assessment. The U.S. Department of Education granted an assessment waiver to Montana, which resulted in the state not having to produce or provide performance data (including proficiency assignments) for LEAs administering the field test. In FFY 2024, the previous field test became the regular statewide assessment used by all LEAs in the state for grades 3-8 in mathematics and ELA. As such, the SEA met with stakeholders through the state special education advisory panel (SEAP) to inform them that baselines must be reset for mathematics and ELA assessments for grade 4 and grade 8 and to solicit input and feedback on new targets. Stakeholders were provided details about the indicator as an overview to support diverse learners who may not have the base understanding necessary to meaningfully provide feedback and input.

While Montana did revise baselines for grades 4 and 8 for both reading and math assessments, the state will continue to use the target of 95% participation for each grade and assessment to align the state Every Student Succeeds Act (ESSA) plan.

FFY 2024 Data Disaggregation from EDFacts

Data Source:

SY 2024-25 Assessment Participation in Reading/Language Arts (EDFacts file spec FS188; Data Group: 882, 883)

Date:

01/07/2026

Reading Assessment Participation Data by Grade (1)

Group	Grade 4	Grade 8	Grade HS
a. Children with IEPs (2)	1,824	1,503	1,132
b. Children with IEPs in regular assessment with no accommodations (3)	1,692	1,352	674
c. Children with IEPs in regular assessment with accommodations (3)	0	0	152
d. Children with IEPs in alternate assessment against alternate standards	104	96	93

Data Source:

SY 2024-25 Assessment Participation in Mathematics (EDFacts file spec FS185; Data Group: 880, 881)

Date:

01/07/2026

Math Assessment Participation Data by Grade

Group	Grade 4	Grade 8	Grade HS
a. Children with IEPs (2)	1,824	1,503	1,132
b. Children with IEPs in regular assessment with no accommodations (3)	1,699	1,360	727
c. Children with IEPs in regular assessment with accommodations (3)	0	0	160

d. Children with IEPs in alternate assessment against alternate standards	102	97	92
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(1) The children with IEPs who are English learners and took the ELP in lieu of the regular reading/language arts assessment are not included in the prefilled data in this indicator.

(2) The children with IEPs count excludes children with disabilities who were reported as exempt due to significant medical emergency in row A for all the prefilled data in this indicator.

(3) The term "regular assessment" is an aggregation of the following types of assessments, as applicable for each grade/ grade group: regular assessment based on grade-level achievement standards, advanced assessment, Innovative Assessment Demonstration Authority (IADA) pilot assessment, high school regular assessment I, high school regular assessment II, high school regular assessment III and locally-selected nationally recognized high school assessment in the prefilled data in this indicator.

FFY 2024 SPP/APR Data: Reading Assessment

Group	Group Name	Number of Children with IEPs Participating	Number of Children with IEPs	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
A	Grade 4	1,796	1,824	54.02%	95.00%	Not Valid and Reliable	N/A	N/A
B	Grade 8	1,448	1,503	59.92%	95.00%	Not Valid and Reliable	N/A	N/A
C	Grade HS	919	1,132	81.83%	95.00%	81.18%	Did not meet target	No Slippage

FFY 2024 SPP/APR Data: Math Assessment

Group	Group Name	Number of Children with IEPs Participating	Number of Children with IEPs	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
A	Grade 4	1,801	1,824	53.63%	95.00%	Not Valid and Reliable	N/A	N/A
B	Grade 8	1,457	1,503	58.53%	95.00%	Not Valid and Reliable	N/A	N/A
C	Grade HS	979	1,132	87.48%	95.00%	86.48%	Did not meet target	No Slippage

Regulatory Information

The SEA, (or, in the case of a district-wide assessment, LEA) must make available to the public, and report to the public with the same frequency and in the same detail as it reports on the assessment of nondisabled children: (1) the number of children with disabilities participating in: (a) regular assessments, and the number of those children who were provided accommodations in order to participate in those assessments; and (b) alternate assessments aligned with alternate achievement standards; and (2) the performance of children with disabilities on regular assessments and on alternate assessments, compared with the achievement of all children, including children with disabilities, on those assessments. [20 U.S.C. 1412 (a)(16)(D); 34 CFR §300.160(f)]

Public Reporting Information

Provide links to the page(s) where you provide public reports of assessment results.

The following link is the website where assessment data have been publicly posted (under "Assessment Data" header):

<https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education#10963313031-idea-data>

The following link is a direct link to the publicly reported assessment data:

https://opi.mt.gov/Portals/182/Page%20Files/Special%20Education/IDEA%20Data/Public%20Reporting%20-%20FFY%202024%20Assessment%20Data_Suppressed.xlsx?ver=2026-01-02-130436-873

Provide additional information about this indicator (optional)

In FFY 2023, Montana allowed LEAs to opt into administration of a new field through-year assessment for students grades 3-8 in mathematics and ELA who are required to take the statewide summative assessment. The U.S. Department of Education granted an assessment waiver to Montana, which resulted in the state not having to produce or provide performance data (including proficiency assignments) for LEAs administering the field test. In FFY 2024, the previous field test became the regular statewide assessment used by all LEAs in the state for grades 3-8 in mathematics and ELA. As such, the data for FFY 2024 is no longer comparable to the FFY 2023 data given that an entirely new statewide assessment was utilized for by all LEAs in the state (change in data source). For this reason, the state reset the baseline data for grade 4 and grade 8 in the areas of mathematics and ELA to FFY 2024 data and established new targets that were informed by stakeholder input (see "Targets: Description of Stakeholder Input" field).

3A - Prior FFY Required Actions

None

3A - OSEP Response

OSEP cannot determine if the data are valid and reliable. Due to data quality concerns with the State's assessment data, the FFY 2024 data for Reading Grades 4 and 8 and Math Grades 4 and 8 are being suppressed. Therefore, OSEP cannot determine whether the State met its target.

The State has revised the baseline for Reading grades 4 and 8 and Math grades 4 and 8, using data from FFY 2024, but OSEP cannot accept those revisions because OSEP cannot determine if those data are valid and reliable.

3A - Required Actions

Indicator 3B: Proficiency for Children with IEPs Against Grade Level Academic Achievement Standards

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results indicator: Participation and performance of children with IEPs on statewide assessments:

- A. Participation rate for children with IEPs.
- B. Proficiency rate for children with IEPs against grade level academic achievement standards.
- C. Proficiency rate for children with IEPs against alternate academic achievement standards.
- D. Gap in proficiency rates for children with IEPs and all students against grade level academic achievement standards.

(20 U.S.C. 1416 (a)(3)(A))

Data Source

3B. Same data as used for reporting to the Department under Title I of the ESEA, using EDEFACTS file specifications FS175 and 178.

Measurement

B. Proficiency rate percent = [(# of children with IEPs scoring at or above proficient against grade level academic achievement standards) divided by the (total # of children with IEPs who received a valid score and for whom a proficiency level was assigned for the regular assessment)]. Calculate separately for reading and math. Calculate separately for grades 4, 8, and high school. The proficiency rate includes both children with IEPs enrolled for a full academic year and those not enrolled for a full academic year.

Instructions

Describe the results of the calculations and compare the results to the targets. Provide the actual numbers used in the calculation.

Include information regarding where to find public reports of assessment participation and performance results, as required by 34 CFR §300.160(f), i.e., a link to the Web site where these data are reported.

Indicator 3B: Proficiency calculations in this SPP/APR must result in proficiency rates for children with IEPs on the regular assessment in reading/language arts and mathematics assessments (separately) in each of the following grades: 4, 8, and high school, including both children with IEPs enrolled for a full academic year and those not enrolled for a full academic year. Only include children with disabilities who had an IEP at the time of testing.

3B - Indicator Data

Historical Data:

Subject	Group	Group Name	Baseline Year	Baseline Data
Reading	A	Grade 4	2024	14.01%
Reading	B	Grade 8	2024	10.36%
Reading	C	Grade HS	2018	5.71%
Math	A	Grade 4	2024	12.07%
Math	B	Grade 8	2024	8.24%
Math	C	Grade HS	2018	4.76%

Targets

Subject	Group	Group Name	2024	2025
Reading	A >=	Grade 4	14.01%	14.02%
Reading	B >=	Grade 8	10.36%	10.37%
Reading	C >=	Grade HS	6.10%	6.20%
Math	A >=	Grade 4	12.07%	12.08%
Math	B >=	Grade 8	8.24%	8.25%
Math	C >=	Grade HS	5.20%	5.30%

Targets: Description of Stakeholder Input

The Special Education Advisory Panel (SEAP) in Montana has been in existence since 2013. The SEAP is made up of 16 members, seven of whom are parents of students with disabilities. The panel is fully vested and broadly representative of Montana. Many of the panel members serve in other agency or organization leadership positions or on advisory councils as the voice of students with disabilities. This enables the SEA to draw insight and advice from a diverse group of stakeholders with an understanding of Montana's unique needs and strengths.

In the 2024-25 and 2025-26 school years, the SEA asked for input on Indicators 3, 4, 9, and 10 from the SEAP. The SEA presented information on the SPP/APR as a whole and then dug into the specific indicators for feedback on targets and proposed methodological changes. The SEAP agreed with the SEA's proposal. Meeting minutes from discussions with SEAP as well as presentation materials have been posted publicly for all stakeholder review and input on the state website for SEAP: <https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education/Regulations-and-Guidance#10965413037-federal-requirements>.

In the spring of every school year, the SEA brings together parents, Montana's Parent Training and Information center the Montana Empowerment Center (MEC), the SEAP, and other state agencies for a joint partnership meeting. During this meeting the SEA reviews the APR submitted in February. The SEA asks for suggestions on how to potentially improve the outcomes of the indicators along with doing a data drill down of the state data and district level data.

In addition to the above-mentioned stakeholders, the SEA worked with many other stakeholder groups that support students with disabilities. Those groups include but are not limited to:

Monthly Special Education Director's calls

Montana Council for Exceptional Children (MCEC) – presented on updates at the SEA, national level, and writing compliant special education paperwork
Vocational Rehabilitation and Blind Services – strengthening our secondary transition

Summer Institute

Montana Council of Administrators of Special Education (MCASE)

Higher Education Consortium (HEC)

Dawson Community College – assisted in setting up level 2 of the ParaPathways Program

CSPD Regional Directors

Montana Empowerment Center – Monthly meetings

Disability Rights Montana

In FFY 2023, Montana allowed LEAs to opt into administration of a new field through-year assessment for students grades 3-8 in mathematics and ELA who are required to take the statewide summative assessment. The U.S. Department of Education granted an assessment waiver to Montana, which resulted in the state not having to produce or provide performance data (including proficiency assignments) for LEAs administering the field test. In FFY 2024, the previous field test became the regular statewide assessment used by all LEAs in the state for grades 3-8 in mathematics and ELA. As such, the SEA met with stakeholders through the state special education advisory panel (SEAP) to inform them that baselines must be reset for mathematics and ELA assessments for grade 4 and grade 8 and to solicit input and feedback on new targets. Stakeholders were provided details about the indicator as an overview to support diverse learners who may not have the base understanding necessary to meaningfully provide feedback and input. Based on internal analyses and stakeholder feedback, new targets were established for FFY 2024 and FFY 2025. While the targets reflect a very modest improvement over the baseline in FFY 2025, this is due to the fact that FFY 2024 was the first year of the new statewide assessment and there is not longitudinal data available to analyze trends. As such, the state will be reviewing targets with stakeholders annually as more data becomes available that will allow for longitudinal analyses.

FFY 2024 Data Disaggregation from EDFacts

Data Source:

SY 2024-25 Academic Achievement in Reading/Language Arts (EDFacts file spec FS178; Data Group: 876, 877)

Date:

01/07/2026

Reading Assessment Proficiency Data by Grade (1)

Group	Grade 4	Grade 8	Grade HS
a. Children with IEPs who received a valid score and a proficiency level was assigned for the regular assessment	1,692	1,352	826
b. Children with IEPs in regular assessment with no accommodations scored at or above proficient against grade level	237	140	93
c. Children with IEPs in regular assessment with accommodations scored at or above proficient against grade level	0	0	6

Data Source:

SY 2024-25 Academic Achievement in Mathematics (EDFacts file spec FS175; Data Group: 874, 875)

Date:

01/07/2026

Math Assessment Proficiency Data by Grade (1)

Group	Grade 4	Grade 8	Grade HS
a. Children with IEPs who received a valid score and a	1,699	1,360	887

proficiency level was assigned for the regular assessment			
b. Children with IEPs in regular assessment with no accommodations scored at or above proficient against grade level	205	112	30
c. Children with IEPs in regular assessment with accommodations scored at or above proficient against grade level	0	0	2

(1)The term “regular assessment” is an aggregation of the following types of assessments as applicable for each grade/ grade group: regular assessment based on grade-level achievement standards, advanced assessment, Innovative Assessment Demonstration Authority (IADA) pilot assessment, high school regular assessment I, high school regular assessment II, high school regular assessment III and locally-selected nationally recognized high school assessment in the prefilled data in this indicator.

FFY 2024 SPP/APR Data: Reading Assessment

Group	Group Name	Number of Children with IEPs Scoring At or Above Proficient Against Grade Level Academic Achievement Standards	Number of Children with IEPs who Received a Valid Score and for whom a Proficiency Level was Assigned for the Regular Assessment	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
A	Grade 4	237	1,692	18.34%	14.01%	Not Valid and Reliable	N/A	N/A
B	Grade 8	140	1,352	10.92%	10.36%	Not Valid and Reliable	N/A	N/A
C	Grade HS	99	826	9.89%	6.10%	11.99%	Met target	No Slippage

FFY 2024 SPP/APR Data: Math Assessment

Group	Group Name	Number of Children with IEPs Scoring At or Above Proficient Against Grade Level Academic Achievement Standards	Number of Children with IEPs who Received a Valid Score and for whom a Proficiency Level was Assigned for the Regular Assessment	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
A	Grade 4	205	1,699	18.70%	12.07%	Not Valid and Reliable	N/A	N/A
B	Grade 8	112	1,360	4.77%	8.24%	Not Valid and Reliable	N/A	N/A
C	Grade HS	32	887	4.09%	5.20%	3.61%	Did not meet target	Slippage

Provide reasons for slippage for Group C, if applicable

From FFY 2023 to FFY 2024, there was a decrease of 0.48 percentage points in proficiency rates for high school students with disabilities on the mathematics regular statewide assessment. The state conducted several analyses to determine potential reasons for slippage. First, the state observed an overall decrease in the number of high school students receiving valid scores on the mathematics assessment (2% decrease). While on the whole this decrease may seem nominal, in small populations like those in Montana, shifts in small numbers can have more substantial impacts on the overall state data. Accordingly, this could have accounted in part to this slippage.

While this decrease in population of students with disabilities receiving valid scores is worth noting, the state also endeavored to investigate whether there were particular LEAs that were experiencing lower proficiency rates in FFY 2024 as compared to FFY 2023 to see any trends that would explain the slippage. Through this analysis, the state determined that of the 13 LEAs with decreases in proficiency rates from FFY 2023 to FFY 2024, 4 of these LEAs were among the largest in the state (all in the top 15 largest LEAs, based on total student population). Thus, shifts in their data had greater bearing on statewide data. In both FFY 2023 and FFY 2024, these 4 LEAs made up roughly 33% of the total high school students with disabilities population receiving a valid score for the regular statewide mathematics assessment. In FFY 2023, 7.70% of the high school students with disabilities receiving valid scores on the regular statewide mathematics assessment in these 4 districts were determined proficient. However, in FFY 2024 only 5.50% were determined proficient. This decrease in proficiency rates for these 4 LEAs by more than 2 percentage points, coupled with the fact these 4 LEAs are

such a substantial portion of the population being evaluated in the state, certainly is a likely reason for the statewide decrease in proficiency for high school students on the mathematics regular statewide assessment.

As to why proficiency rates in these large LEAs and others decreased across the state, LEAs have reported significant staffing shortages across the state. These staffing shortages have made it challenging for LEAs to find educators with the training, expertise, and experience to effectively support students with disabilities in differentiating instruction in core instruction. This too may be a likely reason for the slippage observed.

Regulatory Information

The SEA, (or, in the case of a district-wide assessment, LEA) must make available to the public, and report to the public with the same frequency and in the same detail as it reports on the assessment of nondisabled children: (1) the number of children with disabilities participating in: (a) regular assessments, and the number of those children who were provided accommodations in order to participate in those assessments; and (b) alternate assessments aligned with alternate achievement standards; and (2) the performance of children with disabilities on regular assessments and on alternate assessments, compared with the achievement of all children, including children with disabilities, on those assessments. [20 U.S.C. 1412 (a)(16)(D); 34 CFR §300.160(f)]

Public Reporting Information

Provide links to the page(s) where you provide public reports of assessment results.

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Provide additional information about this indicator (optional)

In FFY 2023, Montana allowed LEAs to opt into administration of a new field through-year assessment for students grades 3-8 in mathematics and ELA who are required to take the statewide summative assessment. The U.S. Department of Education granted an assessment waiver to Montana, which resulted in the state not having to produce or provide performance data (including proficiency assignments) for LEAs administering the field test. In FFY 2024, the previous field test became the regular statewide assessment used by all LEAs in the state for grades 3-8 in mathematics and ELA. As such, the data for FFY 2024 is no longer comparable to the FFY 2023 data given that an entirely new statewide assessment was utilized for by all LEAs in the state (change in data source). For this reason, the state reset the baseline data for grade 4 and grade 8 in the areas of mathematics and ELA to FFY 2024 data and established new targets that were informed by stakeholder input (see "Targets: Description of Stakeholder Input" field).

3B - Prior FFY Required Actions

None

3B - OSEP Response

OSEP cannot determine if the data are valid and reliable. Due to data quality concerns with the State's assessment data, the FFY 2024 data for Reading Grades 4 and 8 and Math Grades 4 and 8 are being suppressed. Therefore, OSEP cannot determine whether the State met its target.

The State has revised the baseline for Reading grades 4 and 8 and Math grades 4 and 8, using data from FFY 2024, but OSEP cannot accept those revisions because OSEP cannot determine if those data are valid and reliable.

3B - Required Actions

Indicator 3C: Proficiency for Children with IEPs Against Alternate Academic Achievement Standards

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results indicator: Participation and performance of children with IEPs on statewide assessments:

- A. Participation rate for children with IEPs.
- B. Proficiency rate for children with IEPs against grade level academic achievement standards.
- C. Proficiency rate for children with IEPs against alternate academic achievement standards.
- D. Gap in proficiency rates for children with IEPs and all students against grade level academic achievement standards.

(20 U.S.C. 1416 (a)(3)(A))

Data Source

3C. Same data as used for reporting to the Department under Title I of the ESEA, using ED Facts file specifications FS175 and 178.

Measurement

C. Proficiency rate percent = [(# of children with IEPs scoring at or above proficient against alternate academic achievement standards) divided by the (total # of children with IEPs who received a valid score and for whom a proficiency level was assigned for the alternate assessment)]. Calculate separately for reading and math. Calculate separately for grades 4, 8, and high school. The proficiency rate includes both children with IEPs enrolled for a full academic year and those not enrolled for a full academic year.

Instructions

Describe the results of the calculations and compare the results to the targets. Provide the actual numbers used in the calculation.

Include information regarding where to find public reports of assessment participation and performance results, as required by 34 CFR §300.160(f), i.e., a link to the Web site where these data are reported.

Indicator 3C: Proficiency calculations in this SPP/APR must result in proficiency rates for children with IEPs on the alternate assessment in reading/language arts and mathematics assessments (separately) in each of the following grades: 4, 8, and high school, including both children with IEPs enrolled for a full academic year and those not enrolled for a full academic year. Only include children with disabilities who had an IEP at the time of testing.

3C - Indicator Data

Historical Data:

Subject	Group	Group Name	Baseline Year	Baseline Data
Reading	A	Grade 4	2018	48.33%
Reading	B	Grade 8	2018	41.75%
Reading	C	Grade HS	2018	51.11%
Math	A	Grade 4	2018	50.85%
Math	B	Grade 8	2018	45.63%
Math	C	Grade HS	2018	43.33%

Targets

Subject	Group	Group Name	2024	2025
Reading	A >=	Grade 4	48.90%	50.00%
Reading	B >=	Grade 8	42.20%	42.30%
Reading	C >=	Grade HS	51.60%	51.70%
Math	A >=	Grade 4	51.40%	51.50%
Math	B >=	Grade 8	46.20%	46.30%
Math	C >=	Grade HS	43.90%	44.00%

Targets: Description of Stakeholder Input

The Special Education Advisory Panel (SEAP) in Montana has been in existence since 2013. The SEAP is made up of 16 members, seven of whom are parents of students with disabilities. The panel is fully vested and broadly representative of Montana. Many of the panel members serve in other agency or organization leadership positions or on advisory councils as the voice of students with disabilities. This enables the SEA to draw insight and advice from a diverse group of stakeholders with an understanding of Montana's unique needs and strengths.

In the 2024-25 and 2025-26 school years, the SEA asked for input on Indicators 3, 4, 9, and 10 from the SEAP. The SEA presented information on the SPP/APR as a whole and then dug into the specific indicators for feedback on targets and proposed methodological changes. The SEAP agreed with the SEA's proposal. Meeting minutes from discussions with SEAP as well as presentation materials have been posted publicly for all stakeholder review.

and input on the state website for SEAP: <https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education/Regulations-and-Guidance#10965413037-federal-requirements>.

In the spring of every school year, the SEA brings together parents, Montana's Parent Training and Information center the Montana Empowerment Center (MEC), the SEAP, and other state agencies for a joint partnership meeting. During this meeting the SEA reviews the APR submitted in February. The SEA asks for suggestions on how to potentially improve the outcomes of the indicators along with doing a data drill down of the state data and district level data.

In addition to the above-mentioned stakeholders, the SEA worked with many other stakeholder groups that support students with disabilities. Those groups include but are not limited to:

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Montana Council for Exceptional Children (MCEC) – presented on updates at the SEA, national level, and writing compliant special education paperwork

Vocational Rehabilitation and Blind Services – strengthening our secondary transition

Summer Institute

Montana Council of Administrators of Special Education (MCASE)

Higher Education Consortium (HEC)

Dawson Community College – assisted in setting up level 2 of the ParaPathways Program

CSPD Regional Directors

Montana Empowerment Center – Monthly meetings

Disability Rights Montana

FFY 2024 Data Disaggregation from EDFacts

Data Source:

SY 2024-25 Academic Achievement in Reading/Language Arts (EDFacts file spec FS178; Data Group: 876, 877)

Date:

01/07/2026

Reading Assessment Proficiency Data by Grade

Group	Grade 4	Grade 8	Grade HS
a. Children with IEPs who received a valid score and a proficiency level was assigned for the alternate assessment	104	96	93
b. Children with IEPs in alternate assessment against alternate standards scored at or above proficient	40	34	49

Data Source:

SY 2024-25 Academic Achievement in Mathematics (EDFacts file spec FS175; Data Group: 874, 875)

Date:

01/07/2026

Math Assessment Proficiency Data by Grade

Group	Grade 4	Grade 8	Grade HS
a. Children with IEPs who received a valid score and a proficiency level was assigned for the alternate assessment	102	97	92
b. Children with IEPs in alternate assessment against alternate standards scored at or above proficient	58	51	49

FFY 2024 SPP/APR Data: Reading Assessment

Group	Group Name	Number of Children with IEPs Scoring At or Above Proficient Against Alternate Academic Achievement Standards	Number of Children with IEPs who Received a Valid Score and for whom a Proficiency Level was Assigned for the Alternate Assessment	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
A	Grade 4	40	104	39.25%	48.90%	38.46%	Did not meet target	No Slippage
B	Grade 8	34	96	48.11%	42.20%	35.42%	Did not meet target	Slippage
C	Grade HS	49	93	52.94%	51.60%	52.69%	Met target	No Slippage

Provide reasons for slippage for Group B, if applicable

From FFY 2023 to FFY 2024, there was a decrease of 12.70 percentage points in proficiency rates for grade 8 students with disabilities on the ELA regular statewide assessment. The state conducted several analyses to determine potential reasons for slippage. First, the state observed an overall decrease in the number of grade 8 students receiving valid scores on the ELA assessment (9.43% decrease). While on the whole this decrease may seem nominal, in small populations like those in Montana, shifts in small numbers can have more substantial impacts on the overall state data. Accordingly, this could have accounted in part for this slippage.

While this decrease in population of students with disabilities receiving valid scores is worth noting, the state also endeavored to investigate whether there were particular LEAs that were experiencing lower proficiency rates in FFY 2024 as compared to FFY 2023 to see any trends that would explain the slippage. Through this analysis, the state determined that of the 14 LEAs with decreases in proficiency rates from FFY 2023 to FFY 2024, 5 of these LEAs were among the largest in the state (all in the top 20 largest LEAs, based on total student population). Thus, shifts in their data had greater bearing on statewide data. In FFY 2023 and FFY 2024, these 5 LEAs made up roughly 39.62% and 33.33%, respectively, of the total grade 8 students with disabilities population receiving a valid score for the alternate ELA assessment. In FFY 2023, 52.38% of the grade 8 students with disabilities receiving valid scores on the alternate ELA assessment in these 5 districts were determined proficient. However, in FFY 2024 only 28.13% were determined proficient. This decrease in proficiency rates for these 5 LEAs by 24.25 percentage points, coupled with the fact these 5 LEAs are such a substantial portion of the population being evaluated in the state, certainly is a likely reason for the statewide decrease in proficiency for high school students on the mathematics regular statewide assessment.

As to why proficiency rates in these large LEAs and others decreased across the state, LEAs have reported significant staffing shortages across the state. These staffing shortages have made it challenging for LEAs to find educators with the training, expertise, and experience to effectively support students with disabilities with more comprehensive needs or cognitive impairments. This too may be a likely reason for the slippage observed. Further, to move close to the 1% threshold for participation in the alternate assessment, LEAs have been making more concerted efforts to ensure that only those students with disabilities with the most substantial needs and cognitive impairments are taking the alternate assessment. Efforts to address this likely contributed to the decrease in the number of students participating in the alternate assessment and the proficiency rates.

FFY 2024 SPP/APR Data: Math Assessment

Group	Group Name	Number of Children with IEPs Scoring At or Above Proficient Against Alternate Academic Achievement Standards	Number of Children with IEPs who Received a Valid Score and for whom a Proficiency Level was Assigned for the Alternate Assessment	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
A	Grade 4	58	102	51.89%	51.40%	56.86%	Met target	No Slippage
B	Grade 8	51	97	56.60%	46.20%	52.58%	Met target	No Slippage
C	Grade HS	49	92	51.49%	43.90%	53.26%	Met target	No Slippage

Regulatory Information

The SEA, (or, in the case of a district-wide assessment, LEA) must make available to the public, and report to the public with the same frequency and in the same detail as it reports on the assessment of nondisabled children: (1) the number of children with disabilities participating in: (a) regular assessments, and the number of those children who were provided accommodations in order to participate in those assessments; and (b) alternate assessments aligned with alternate achievement standards; and (2) the performance of children with disabilities on regular assessments and on alternate assessments, compared with the achievement of all children, including children with disabilities, on those assessments. [20 U.S.C. 1412 (a)(16)(D); 34 CFR §300.160(f)]

Public Reporting Information

Provide links to the page(s) where you provide public reports of assessment results.

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Provide additional information about this indicator (optional)

N/A

3C - Prior FFY Required Actions

None

3C - OSEP Response

3C - Required Actions

Indicator 3D: Gap in Proficiency Rates For Children with IEPs and All Students Against Grade Level Academic Achievement Standards

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results indicator: Participation and performance of children with IEPs on statewide assessments:

- A. Participation rate for children with IEPs.
- B. Proficiency rate for children with IEPs against grade level academic achievement standards.
- C. Proficiency rate for children with IEPs against alternate academic achievement standards.
- D. Gap in proficiency rates for children with IEPs and all students against grade level academic achievement standards.

(20 U.S.C. 1416 (a)(3)(A))

Data Source

3D. Same data as used for reporting to the Department under Title I of the ESEA, using EDEfacts file specifications FS175 and 178.

Measurement

D. Proficiency rate gap = [(proficiency rate for children with IEPs scoring at or above proficient against grade level academic achievement standards for the 2024-2025 school year) subtracted from the (proficiency rate for all students scoring at or above proficient against grade level academic achievement standards for the 2024-2025 school year)]. Calculate separately for reading and math. Calculate separately for grades 4, 8, and high school. The proficiency rate includes all children enrolled for a full academic year and those not enrolled for a full academic year.

Instructions

Describe the results of the calculations and compare the results to the targets. Provide the actual numbers used in the calculation. Include information regarding where to find public reports of assessment participation and performance results, as required by 34 CFR §300.160(f), i.e., a link to the Web site where these data are reported. Indicator 3D: Gap calculations in this SPP/APR must result in the proficiency rate for children with IEPs were proficient against grade level academic achievement standards for the 2024-2025 school year compared to the proficiency rate for all students who were proficient against grade level academic achievement standards for the 2024-2025 school year. Calculate separately for reading/language arts and math in each of the following grades: 4, 8, and high school, including both children enrolled for a full academic year and those not enrolled for a full academic year. Only include children with disabilities who had an IEP at the time of testing.

3D - Indicator Data

Historical Data:

Subject	Group	Group Name	Baseline Year	Baseline Data
Reading	A	Grade 4	2024	31.36
Reading	B	Grade 8	2024	33.93
Reading	C	Grade HS	2018	40.54
Math	A	Grade 4	2024	25.70
Math	B	Grade 8	2024	30.18
Math	C	Grade HS	2018	28.85

Targets

Subject	Group	Group Name	2024	2025
Reading	A <=	Grade 4	31.36	31.35
Reading	B <=	Grade 8	33.93	33.92
Reading	C <=	Grade HS	40.14	40.04
Math	A <=	Grade 4	25.70	25.69
Math	B <=	Grade 8	30.18	30.17
Math	C <=	Grade HS	28.45	28.35

Targets: Description of Stakeholder Input

The Special Education Advisory Panel (SEAP) in Montana has been in existence since 2013. The SEAP is made up of 16 members, seven of whom are parents of students with disabilities. The panel is fully vested and broadly representative of Montana. Many of the panel members serve in other agency or organization leadership positions or on advisory councils as the voice of students with disabilities. This enables the SEA to draw insight and advice from a diverse group of stakeholders with an understanding of Montana’s unique needs and strengths.

In the 2024-25 and 2025-26 school years, the SEA asked for input on Indicators 3, 4, 9, and 10 from the SEAP. The SEA presented information on the SPP/APR as a whole and then dug into the specific indicators for feedback on targets and proposed methodological changes. The SEAP agreed with

the SEA's proposal. Meeting minutes from discussions with SEAP as well as presentation materials have been posted publicly for all stakeholder review and input on the state website for SEAP: <https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education/Regulations-and-Guidance#10965413037-federal-requirements>.

In the spring of every school year, the SEA brings together parents, Montana's Parent Training and Information center the Montana Empowerment Center (MEC), the SEAP, and other state agencies for a joint partnership meeting. During this meeting the SEA reviews the APR submitted in February. The SEA asks for suggestions on how to potentially improve the outcomes of the indicators along with doing a data drill down of the state data and district level data.

In addition to the above-mentioned stakeholders, the SEA worked with many other stakeholder groups that support students with disabilities. Those groups include but are not limited to:

Monthly Special Education Director's calls

Montana Council for Exceptional Children (MCEC) – presented on updates at the SEA, national level, and writing compliant special education paperwork

Vocational Rehabilitation and Blind Services – strengthening our secondary transition

Summer Institute

Montana Council of Administrators of Special Education (MCASE)

Higher Education Consortium (HEC)

Dawson Community College – assisted in setting up level 2 of the ParaPathways Program

CSPD Regional Directors

Montana Empowerment Center – Monthly meetings

Disability Rights Montana

In FFY 2023, Montana allowed LEAs to opt into administration of a new field through-year assessment for students grades 3-8 in mathematics and ELA who are required to take the statewide summative assessment. The U.S. Department of Education granted an assessment waiver to Montana, which resulted in the state not having to produce or provide performance data (including proficiency assignments) for LEAs administering the field test. In FFY 2024, the previous field test became the regular statewide assessment used by all LEAs in the state for grades 3-8 in mathematics and ELA. As such, the SEA met with stakeholders through the state special education advisory panel (SEAP) to inform them that baselines must be reset for mathematics and ELA assessments for grade 4 and grade 8 and to solicit input and feedback on new targets. Stakeholders were provided details about the indicator as an overview to support diverse learners who may not have the base understanding necessary to meaningfully provide feedback and input. Based on internal analyses and stakeholder feedback, new targets were established for FFY 2024 and FFY 2025. While the targets reflect a very modest improvement over the baseline in FFY 2025, this is due to the fact that FFY 2024 was the first year of the new statewide assessment and there is no longitudinal data available to analyze trends. As such, the state will be reviewing targets with stakeholders annually as more data becomes available that will allow for longitudinal analyses.

FFY 2024 Data Disaggregation from EDFacts

Data Source:

SY 2024-25 Academic Achievement in Reading/Language Arts (EDFacts file spec FS178; Data Group: 876, 877)

Date:

01/07/2026

Reading Assessment Proficiency Data by Grade (1)

Group	Grade 4	Grade 8	Grade HS
a. All Students who received a valid score and a proficiency was assigned for the regular assessment	11,056	10,784	9,529
b. Children with IEPs who received a valid score and a proficiency was assigned for the regular assessment	1,692	1,352	826
c. All students in regular assessment with no accommodations scored at or above proficient against grade level	5,016	4,776	5,213
d. All students in regular assessment with accommodations scored at or above proficient against grade level	0	0	19
e. Children with IEPs in regular assessment with no accommodations scored at or above proficient against grade level	237	140	93
f. Children with IEPs in regular assessment with accommodations scored at or above proficient against grade level	0	0	6

Data Source:

Date:

01/07/2026

Math Assessment Proficiency Data by Grade (1)

Group	Grade 4	Grade 8	Grade HS
a. All Students who received a valid score and a proficiency was assigned for the regular assessment	11,115	10,852	9,693
b. Children with IEPs who received a valid score and a proficiency was assigned for the regular assessment	1,699	1,360	887
c. All students in regular assessment with no accommodations scored at or above proficient against grade level	4,198	4,169	3,019
d. All students in regular assessment with accommodations scored at or above proficient against grade level	0	0	7
e. Children with IEPs in regular assessment with no accommodations scored at or above proficient against grade level	205	112	30
f. Children with IEPs in regular assessment with accommodations scored at or above proficient against grade level	0	0	2

(1)The term “regular assessment” is an aggregation of the following types of assessments as applicable for each grade/ grade group: regular assessment based on grade-level achievement standards, advanced assessment, Innovative Assessment Demonstration Authority (IADA) pilot assessment, high school regular assessment I, high school regular assessment II, high school regular assessment III and locally-selected nationally recognized high school assessment in the prefilled data in this indicator.

FFY 2024 SPP/APR Data: Reading Assessment

Group	Group Name	Proficiency rate for children with IEPs scoring at or above proficient against grade level academic achievement standards	Proficiency rate for all students scoring at or above proficient against grade level academic achievement standards	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
A	Grade 4	14.01%	45.37%	28.40	31.36	Not Valid and Reliable	N/A	N/A
B	Grade 8	10.36%	44.29%	31.98	33.93	Not Valid and Reliable	N/A	N/A
C	Grade HS	11.99%	54.91%	42.71	40.14	42.92	Did not meet target	No Slippage

FFY 2024 SPP/APR Data: Math Assessment

Group	Group Name	Proficiency rate for children with IEPs scoring at or above proficient against grade level academic achievement standards	Proficiency rate for all students scoring at or above proficient against grade level academic achievement standards	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
A	Grade 4	12.07%	37.77%	25.80	25.70	Not Valid and Reliable	N/A	N/A
B	Grade 8	8.24%	38.42%	28.56	30.18	Not Valid and Reliable	N/A	N/A
C	Grade HS	3.61%	31.22%	26.42	28.45	27.61	Met target	No Slippage

Provide additional information about this indicator (optional)

In FFY 2023, Montana allowed LEAs to opt into administration of a new field through-year assessment for students grades 3-8 in mathematics and ELA who are required to take the statewide summative assessment. The U.S. Department of Education granted an assessment waiver to Montana, which resulted in the state not having to produce or provide performance data (including proficiency assignments) for LEAs administering the field test. In FFY 2024, the previous field test became the regular statewide assessment used by all LEAs in the state for grades 3-8 in mathematics and ELA. As such, the data for FFY 2024 is no longer comparable to the FFY 2023 data given that an entirely new statewide assessment was utilized for by all LEAs in the state (change in data source). For this reason, the state reset the baseline data for grade 4 and grade 8 in the areas of mathematics and ELA to FFY 2024 data and established new targets that were informed by stakeholder input (see "Targets: Description of Stakeholder Input" field).

3D - Prior FFY Required Actions

None

3D - OSEP Response

OSEP cannot determine if the data are valid and reliable. Due to data quality concerns with the State's assessment data, the FFY 2024 data for Reading Grades 4 and 8 and Math Grades 4 and 8 are being suppressed. Therefore, OSEP cannot determine whether the State met its target.

The State has revised the baseline for Reading grades 4 and 8 and Math grades 4 and 8, using data from FFY 2024, but OSEP cannot accept those revisions because OSEP cannot determine if those data are valid and reliable.

The State has revised FFY 2025 targets for Reading grades 4 and 8 and Math grades 4 and 8 but OSEP cannot accept those targets because OSEP cannot determine whether the State's end targets for FFY 2025 reflect improvement over the State's baseline data, given that the State's revised baseline cannot be accepted, as noted above. The State must ensure its FFY 2025 targets reflect improvement.

3D - Required Actions

Indicator 4A: Suspension/Expulsion

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results Indicator: Rates of suspension and expulsion:

- A. Percent of local educational agencies (LEA) that have a significant discrepancy, as defined by the State, in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs; and
- B. Percent of LEAs that have: (a) a significant discrepancy, as defined by the State, by race or ethnicity, in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs; and (b) policies, procedures or practices that contribute to the significant discrepancy, as defined by the State, and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.

(20 U.S.C. 1416(a)(3)(A); 1412(a)(22))

Data Source

State discipline data, including State's analysis of State's Discipline data collected under IDEA Section 618, where applicable. Discrepancy can be computed by either comparing the rates of suspensions and expulsions for children with IEPs to rates for nondisabled children within the LEA or by comparing the rates of suspensions and expulsions for children with IEPs among LEAs within the State.

Measurement

Percent = $\left[\left(\frac{\text{\# of LEAs that meet the State-established n and/or cell size (if applicable) that have a significant discrepancy, as defined by the State, in the rates of suspensions and expulsions for more than 10 days during the school year of children with IEPs}}{\text{\# of LEAs in the State that meet the State-established n and/or cell size (if applicable)}} \right) \right] \times 100$.

Include State's definition of "significant discrepancy."

Instructions

If the State has established a minimum n and/or cell size requirement, the State must provide a definition of its minimum n and/or cell size itself and a description thereof (e.g., a State's n size of 15 represents the number of children with disabilities enrolled in an LEA, and a State's cell size of 5 represents the number of children with disabilities who have received out-of-school suspensions and expulsions of more than 10 days within the LEA).

The State must also provide rationales for its minimum n and/or cell size, including why the definitions chosen are reasonable and based on stakeholder input, and how the definitions ensure that the State is appropriately analyzing and identifying LEAs with significant discrepancy. The State must also indicate whether the minimum n and/or cell size represents a change from the prior SPP/APR reporting period. If so, the State must provide an explanation why the minimum n and/or cell size was changed.

The State may only include, in both the numerator and the denominator, LEAs that met that State established n and/or cell size. If the State used a minimum n and/or cell size requirement, report the number of LEAs totally excluded from the calculation as a result of this requirement.

Describe the results of the State's examination of the data for the year before the reporting year (e.g., for the FFY 2024 SPP/APR, use data from 2023-2024), including data disaggregated by race and ethnicity to determine if significant discrepancies, as defined by the State, are occurring in the rates of long-term suspensions and expulsions (more than 10 days during the school year) of children with IEPs, as required at 20 U.S.C. 1412(a)(22). The State's examination must include one of the following comparisons:

- Option 1: The rates of suspensions and expulsions for children with IEPs among LEAs within the State; or
- Option 2: The rates of suspensions and expulsions for children with IEPs to rates of suspensions and expulsions for nondisabled children within the LEAs.

In the description, specify which method the State used to determine possible discrepancies and explain what constitutes those discrepancies.

If, under Option 1, the State uses a State-level long-term suspension and expulsion rate for children with disabilities to compare to LEA-level long-term suspension and expulsion rates for the purpose of determining whether an LEA has a significant discrepancy, the State must provide the State-level long-term suspension and expulsion rate used in its methodology (e.g., if a State has defined significant discrepancy to exist for an LEA whose long-term suspension/expulsion rate exceeds 2 percentage points above the State-level rate of 0.7%, the State must provide OSEP with the State-level rate of 0.7%).

If, under Option 2, the State uses a rate difference to compare the rates of long-term suspensions and expulsions for children with IEPs to the rates of long-term suspensions and expulsions for nondisabled children within the LEA, the State must provide the State-selected rate difference used in its methodology (e.g., if a State has defined significant discrepancy to exist for an LEA whose rate of long-term suspensions and expulsions for children with IEPs is 4 percentage points above the long-term suspension/expulsion rate for nondisabled children, the State must provide OSEP with the rate difference of 4 percentage points). Similarly, if, under Option 2, the State uses a rate ratio to compare the rates of long-term suspensions and expulsions for children with IEPs to the rates of long-term suspensions and expulsions for nondisabled children within the LEA, the State must provide the State-selected rate ratio used in its methodology (e.g., if a State has defined significant discrepancy to exist for an LEA whose ratio of its long-term suspensions and expulsions rate for children with IEPs to long-term suspensions and expulsions rate for nondisabled children is greater than 3.0, the State must provide OSEP with the rate ratio of 3.0).

Because the Measurement Table requires that the data examined for this indicator are lag year data, States should examine the section 618 data that was submitted by LEAs that were in operation during the school year before the reporting year. For example, if a State has 100 LEAs operating in the 2023-2024 school year, those 100 LEAs would have reported section 618 data in 2023-2024 on the number of children suspended/expelled. If the State then opens 15 new LEAs in 2024-2025, suspension/expulsion data from those 15 new LEAs would not be in the 2023-2024 section 618 data set, and therefore, those 15 new LEAs should not be included in the denominator of the calculation. States must use the number of LEAs from the year before the reporting year in its calculation for this indicator. For the FFY 2024 SPP/APR submission, States must use the number of LEAs reported in 2023-2024 (which can be found in the FFY 2023 SPP/APR introduction).

Indicator 4A: Provide the actual numbers used in the calculation (based upon LEAs that met the minimum n and/or cell size requirement, if applicable). If significant discrepancies occurred, describe how the State educational agency reviewed and, if appropriate, revised (or required the affected local educational agency to revise) its policies, procedures, and practices relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards, to ensure that such policies, procedures, and practices comply with applicable requirements.

Provide detailed information about the timely correction of noncompliance as noted in OSEP's response for the previous SPP/APR. If discrepancies occurred and the LEA with discrepancies had policies, procedures or practices that contributed to the significant discrepancy, as defined by the State, and that do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards, describe how the State ensured that such policies, procedures, and practices were revised to comply with applicable requirements consistent with OSEP Memorandum 23-01, dated July 24, 2023.

If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, improvement activities completed (e.g., review of policies and procedures, technical assistance, training) and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2024 SPP/APR, the data for FFY 2023), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

If the State did not issue any findings because it has adopted procedures that permit its LEAs to correct noncompliance prior to the State's issuance of a finding (i.e., pre-finding correction), the explanation within each applicable indicator must include how the State verified, prior to issuing a finding, that the LEA has corrected each individual case of child-specific noncompliance and is correctly implementing the specific regulatory requirements.

4A - Indicator Data

Historical Data

Baseline Year	Baseline Data
2024	0.56%

FFY	2019	2020	2021	2022	2023
Target <=	0.00%	0.00%	0.00%	0.00%	0.00%
Data					100.00%

Targets

FFY	2024	2025
Target <=	0.56%	0.51%

Targets: Description of Stakeholder Input

The Special Education Advisory Panel (SEAP) in Montana has been in existence since 2013. The SEAP is made up of 16 members, seven of whom are parents of students with disabilities. The panel is fully vested and broadly representative of Montana. Many of the panel members serve in other agency or organization leadership positions or on advisory councils as the voice of students with disabilities. This enables the SEA to draw insight and advice from a diverse group of stakeholders with an understanding of Montana's unique needs and strengths.

In the 2024-25 and 2025-26 school years, the SEA asked for input on Indicators 3, 4, 9, and 10 from the SEAP. The SEA presented information on the SPP/APR as a whole and then dug into the specific indicators for feedback on targets and proposed methodological changes. The SEAP agreed with the SEA's proposal. Meeting minutes from discussions with SEAP as well as presentation materials have been posted publicly for all stakeholder review and input on the state website for SEAP: <https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education/Regulations-and-Guidance#10965413037-federal-requirements>.

In the spring of every school year, the SEA brings together parents, Montana's Parent Training and Information center the Montana Empowerment Center (MEC), the SEAP, and other state agencies for a joint partnership meeting. During this meeting the SEA reviews the APR submitted in February. The SEA asks for suggestions on how to potentially improve the outcomes of the indicators along with doing a data drill down of the state data and district level data.

In addition to the above-mentioned stakeholders, the SEA worked with many other stakeholder groups that support students with disabilities. Those groups include but are not limited to:

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Higher Education Consortium (HEC)

Dawson Community College – assisted in setting up level 2 of the ParaPathways Program

CSPD Regional Directors

Montana Empowerment Center – Monthly meetings

Disability Rights Montana

For the FFY 2024 reporting period, the SEA met with stakeholders through the state special education advisory panel (SEAP) to solicit input and feedback on proposed changes to Indicator 4 comparison group, methodology, and minimum population sizes. Stakeholders were provided details about the indicator as an overview to support diverse learners who may not have the base understanding necessary to meaningfully provide feedback and input.

The SEA team presented research conducted on Indicator 4 methodologies and targets in other similarly situated states, based on their region (Western Mountain), state population size, and state demographics. For all these states, the SEA walked stakeholders through the minimum population sizes used (minimum cell and n-sizes), the comparison group used, methodologies used, and thresholds used. Based on the information provided by the SEA, stakeholders responded positively to the proposed changes to the comparison group, methodology, and targets for Indicator 4. The new Indicator 4A targets reflect the input from these stakeholders.

FFY 2024 SPP/APR Data

Has the state established a minimum n/cell-size requirement? (yes/no)

YES

If yes, the State must provide a definition of its minimum n and/or cell size itself and a description thereof (e.g., a State’s n size of 15 represents the number of children with disabilities enrolled in an LEA, and a State’s cell size of 5 represents the number of children with disabilities who have received out-of-school suspensions and expulsions of more than 10 days within the LEA).

The SEA has set a minimum n-size of 20 and has set no cell size requirement. The minimum n-size represents students with disabilities enrolled in an LEA in the period for reporting (for FFY 2024 this is the 2023-24 school year). In order for a LEA to be included in analysis, there must be at least 20 students with disabilities enrolled in the LEA.

If yes, the State must also provide rationales for its minimum n and/or cell size, including why the definitions chosen are reasonable and based on stakeholder input, and how the definitions ensure that the State is appropriately analyzing and identifying LEAs with significant discrepancy.

The SEA conducted an in-depth analysis of similarly situated states based on region (Western Mountain), state population size, and state demographics. The results of this analysis were shared with stakeholders to provide feedback on the minimum population sizes. Based on the review of other states, the state identified several proposed options related to minimum cell and n-sizes. These options were presented to stakeholders for feedback and input.

Through presenting the SEA’s proposed options to stakeholders, the state received valuable input to move forward with establishing new minimum n-sizes and to remove the previous minimum cell size requirement. Stakeholders agreed that the minimum population sizes should be adjusted to ensure LEAs are included in analysis while also controlling for LEAs with small populations that might skew data.

Based on the feedback and input from stakeholders, as well as internal state discussions, the SEA elected to not set a minimum cell size requirement but chose to set a minimum n-size requirement of 20. The rationale for setting no minimum cell size is that small populations of students with disabilities for many LEAs, in conjunction with the limited number of long-term suspensions/expulsions, results in most LEAs being excluded from analysis when setting minimum cell sizes. Indeed, over 90% of LEAs in the state do not report any long-term suspensions/expulsions for students with disabilities. A minimum cell size of just 1 would preclude the vast majority of LEAs from being included in the analysis.

The rationale for the minimum n-size of 20 students with disabilities is that very small student populations can lead to notable volatility in the data, which can indicate significant discrepancy when there may not be a systemic issue. By ensuring that at least 20 students with disabilities are enrolled, the state is mitigating the potential data volatility by including an appropriate sample of students to make meaningful determinations of significant discrepancy.

By setting a minimum n-size requirement of 20 students with disabilities, 44.61% of LEAs in the state were included in analysis. This is a substantial increase in the previous number of LEAs included in analysis based on minimum population sizes. This is also well above the 10% threshold that has been used by the Office of Special Education Programs (OSEP) to evaluate whether an appropriate number of LEAs were analyzed and identified with significant discrepancy. For all of these reasons, including the stakeholder input, the SEA believes these new minimum population sizes area reasonable and ensure that the state is appropriately analyzing and identifying data for LEAs for significant discrepancy.

If yes, the State must also indicate whether the minimum n and/or cell size represents a change from the prior SPP/APR reporting period.

Yes

If yes, the State must provide an explanation why the minimum n and/or cell size was changed.

The SEA elected to revise the minimum cell and n-size requirements previously established prior to the FFY 2024 reporting period. This was based on the fact that almost no LEAs previously met the minimum cell and n-size requirements, which resulted in very few LEAs being analyzed for significant discrepancy. Using data analyses of similarly situated states, the SEA identified proposed revisions to the minimum population requirements. These proposed options were provided to stakeholders, who agreed with the option of revising the minimum population sizes. As such, beginning in FFY 2024 there is no longer a minimum cell size used, and the minimum n-size requirement is 20 students with disabilities.

If yes, the State may only include, in both the numerator and the denominator, LEAs that met that State-established n/cell size. If the State used a minimum n and/or cell size requirement, report the number of LEAs totally excluded from the calculation as a result of this requirement.

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Number of LEAs that have a significant discrepancy	Number of LEAs that met the State's minimum n/cell-size	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
1	178	100.00%	0.56%	0.56%	N/A	N/A

Choose one of the following comparison methodologies to determine whether significant discrepancies are occurring (34 CFR §300.170(a))

Compare the rates of suspensions and expulsions of greater than 10 days in a school year for children with IEPs among LEAs in the State

State’s definition of “significant discrepancy” and methodology

Number of years of data used = One year

Minimum cell size = none

Minimum n-size = 20 students with disabilities

Methodology = The state first determines the state rate of long-term suspensions/expulsions (out-of-school suspensions or expulsions of greater than 10 days) by dividing the number of students with disabilities with long-term suspensions/expulsions in the state by the total number of students with disabilities enrolled in the state. In FFY 2024, the state rate of long-term suspensions and expulsions was 0.27%.

After calculating the state data, the LEA-level data are calculated. The state calculates significant disproportionality for Indicator 4A by dividing the number of students with disabilities with long-term suspensions/expulsions in an LEA by the total number of students with disabilities enrolled in that same LEA. This provides a long-term suspension/expulsion rate that will be compared to other LEAs using the statewide data (aforementioned) and the applied state threshold.

Threshold = The significant discrepancy threshold is the long-term suspension/expulsion rate for the current reporting period plus four percentage points. In FFY 2024, this means the threshold for significant discrepancy is 4.27% (0.27% + 4.00). The rates of LEAs described above in "Methodology" are compared to the threshold and in FFY 2024 those LEAs with 4.27% or more of their students with disabilities experiencing long-term suspensions/expulsions were identified as having significant discrepancy.

FFY 2024 summary = In the FFY 2024 reporting period, one LEA exceeded the state threshold of 4.27% of students with disabilities experiencing long-term suspensions/expulsions. Accordingly, there was one LEA identified with significant discrepancy.

Provide additional information about this indicator (optional)

In FFY 2024, based on stakeholder input and feedback, the state redesigned the Indicator 4 methodology used for determining significant discrepancy. This included revising the minimum cell and n-size requirements, changing the comparison group to LEAs in the state, and changing the methodology and significant discrepancy threshold to use state long-term suspension/expulsion data. As such, this constitutes a change to methodology and the data for FFY 2024 are no longer comparable to the data from prior years. For this reason, the state reset the Indicator 4A baseline and established new targets based on internal data analyses and stakeholder input.

Review of Policies, Procedures, and Practices (completed in FFY 2024 using 2023-2024 data)

Provide a description of the review of policies, procedures, and practices relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.

As a broad process, the state conducts policies, procedures, and practices reviews for all LEAs determined to have significant discrepancies. These reviews entail analyzing LEA-established policies and procedures related to discipline for students with disabilities, development of functional behavioral assessments (FBAs) and behavior intervention plans (BIPs), mechanisms in individualized education programs (IEPs) to determine special factors related to behavior and behavior supports/services, and processes for manifestation determinations. The state considers and reviews other information on LEA policies and procedures as well, including interviews with LEA staff when appropriate. Further, the state also analyzes the practices of LEAs to determine efficacy in the implementation of the established policies and procedures. This practice review entails looking at student records. Consistent with the state's overall monitoring process, the state selects 10% of students with disabilities who experienced out-of-school suspensions and expulsions for more than 10 days in the reporting period to verify compliance in the implementation of the regulatory requirements. Student data/documents reviewed include discipline logs, IEPs, FBAs/BIPs, manifestation determination documentation, and any other materials deemed pertinent.

For the LEA determined to have a significant discrepancy in FFY 2024, the state review the LEA's published, board-approved discipline policies and procedures, specifically honing in on the procedures related to suspensions/expulsions of students with disabilities. Further, the state looked at the mechanisms established by the LEA to develop FBAs/BIPs and conduct manifestation determinations. The state also selected records for those students suspended/expelled for greater than 10 days. Through the review of both the LEA's policies and procedures as well as the student record reviews to get evidence of practice, the state determined that the LEA demonstrated compliance in policies, procedures, and practices related to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards. Accordingly, there were no instances of noncompliance with Part B requirements for Indicator 4A.

The State DID NOT identify noncompliance with Part B requirements as a result of the review required by 34 CFR §300.170(b)

Correction of Findings of Noncompliance Identified in FFY 2023

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
0	0	0	0

If procedures have been adopted that permit LEAs to correct noncompliance prior to the State's issuance of a finding (i.e., pre-finding correction), describe how, for instances of noncompliance discovered in FFY 2023, the State verified: (1) that the source of noncompliance is correctly implementing the regulatory requirements; and, (2) each individual case of noncompliance was corrected.

N/A

Correction of Findings of Noncompliance Identified Prior to FFY 2023

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2023 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2023 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

4A - Prior FFY Required Actions

None

4A - OSEP Response

The State has revised the baseline for this indicator, using data from FFY 2024, and OSEP accepts that revision.

The State revised its target for this indicator, and OSEP accepts that targets.

4A - Required Actions

Indicator 4B: Suspension/Expulsion

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Compliance Indicator: Rates of suspension and expulsion:

- A. Percent of local educational agencies (LEA) that have a significant discrepancy, as defined by the State, in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs; and
- B. Percent of LEAs that have: (a) a significant discrepancy, as defined by the State, by race or ethnicity, in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs; and (b) policies, procedures or practices that contribute to the significant discrepancy, as defined by the State, and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.

(20 U.S.C. 1416(a)(3)(A); 1412(a)(22))

Data Source

State discipline data, including State's analysis of State's Discipline data collected under IDEA Section 618, where applicable. Discrepancy can be computed by either comparing the rates of suspensions and expulsions for children with IEPs to rates for nondisabled children within the LEA or by comparing the rates of suspensions and expulsions for children with IEPs among LEAs within the State.

Measurement

Percent = [(# of LEAs that meet the State-established n and/or cell size (if applicable) for one or more racial/ethnic groups that have: (a) a significant discrepancy, as defined by the State, by race or ethnicity, in the rates of suspensions and expulsions of more than 10 days during the school year of children with IEPs; and (b) policies, procedures or practices that contribute to the significant discrepancy, as defined by the State, and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards) divided by the (# of LEAs in the State that meet the State-established n and/or cell size (if applicable) for one or more racial/ethnic groups)] times 100.

Include State's definition of "significant discrepancy."

Instructions

If the State has established a minimum n and/or cell size requirement, the State must provide a definition of its minimum n and/or cell size itself and a description thereof (e.g., a State's n size of 15 represents the number of children with disabilities enrolled in an LEA, by race and ethnicity, and a State's cell size of 5 represents the number of children with disabilities who have received out-of-school suspensions and expulsions of more than 10 days within the LEA, by race and ethnicity).

The State must also provide rationales for its minimum n and/or cell size, including why the definitions chosen are reasonable and based on stakeholder input, and how the definitions ensure that the State is appropriately analyzing and identifying LEAs with significant discrepancy, by race and ethnicity. The State must also indicate whether the minimum n and/or cell size represents a change from the prior SPP/APR reporting period. If so, the State must provide an explanation why the minimum n and/or cell size was changed.

The State may only include, in both the numerator and the denominator, LEAs that met that State established n and/or cell size. If the State used a minimum n and/or cell size requirement, report the number of LEAs totally excluded from the calculation as a result of this requirement.

Describe the results of the State's examination of the data for the year before the reporting year (e.g., for the FFY 2024 SPP/APR, use data from 2023-2024), including data disaggregated by race and ethnicity to determine if significant discrepancies, as defined by the State, are occurring in the rates of long-term suspensions and expulsions (more than 10 days during the school year) of children with IEPs, as required at 20 U.S.C. 1412(a)(22). The State's examination must include one of the following comparisons:

- Option 1: The rates of suspensions and expulsions for children with IEPs among LEAs within the State; or
- Option 2: The rates of suspensions and expulsions for children with IEPs to the rates of suspensions and expulsions for nondisabled children within the LEAs

In the description, specify which method the State used to determine possible discrepancies and explain what constitutes those discrepancies.

If, under Option 1, the State uses a State-level long-term suspension and expulsion rate for children with disabilities to compare to LEA-level long-term suspension and expulsion rates for the purpose of determining whether an LEA has a significant discrepancy, by race and ethnicity, the State must provide the State-level long-term suspension and expulsion rate used in its methodology (e.g., if a State has defined significant discrepancy to exist for an LEA whose long-term suspension/expulsion rate exceeds 2 percentage points above the State-level rate of 0.7%, the State must provide OSEP with the State-level rate of 0.7%).

If, under Option 2, the State uses a rate difference to compare the rates of long-term suspensions and expulsions for children with IEPs, by race and ethnicity, to the rates of long-term suspensions and expulsions for nondisabled children within the LEA, the State must provide the State-selected rate difference used in its methodology (e.g., if a State has defined significant discrepancy to exist for an LEA whose rate of long-term suspensions and expulsions for children with IEPs, by race and ethnicity, is 4 percentage points above the long-term suspension/expulsion rate for nondisabled children, the State must provide OSEP with the rate difference of 4 percentage points). Similarly, if, under Option 2, the State uses a rate ratio to compare the rates of long-term suspensions and expulsions for children with IEPs, by race and ethnicity, to the rates of long-term suspensions and expulsions for nondisabled children within the LEA, the State must provide the State-selected rate ratio used in its methodology (e.g., if a State has defined significant discrepancy to exist for an LEA whose ratio of its long-term suspensions and expulsions rate for children with IEPs, by race and ethnicity, to long-term suspensions and expulsions rate for nondisabled children is greater than 3.0, the State must provide OSEP with the rate ratio of 3.0).

Because the Measurement Table requires that the data examined for this indicator are lag year data, States should examine the section 618 data that was submitted by LEAs that were in operation during the school year before the reporting year. For example, if a State has 100 LEAs operating in the 2023-2024 school year, those 100 LEAs would have reported section 618 data in 2023-2024 on the number of children suspended/expelled. If the State then opens 15 new LEAs in 2024-2025, suspension/expulsion data from those 15 new LEAs would not be in the 2023-2024 section 618 data set, and therefore, those 15 new LEAs should not be included in the denominator of the calculation. States must use the number of LEAs from the year before the reporting year in its calculation for this indicator. For the FFY 2023 SPP/APR submission, States must use the number of LEAs reported in 2023-2024 (which can be found in the FFY 2023 SPP/APR introduction).

Indicator 4B: Provide the following: (a) the number of LEAs that met the State-established n and/or cell size (if applicable) for one or more racial/ethnic groups that have a significant discrepancy, as defined by the State, by race or ethnicity, in the rates of long-term suspensions and expulsions (more than 10 days during the school year) for children with IEPs; and (b) the number of those LEAs in which policies, procedures or practices contribute to the significant discrepancy, as defined by the State, and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.

Provide detailed information about the timely correction of noncompliance as noted in OSEP’s response for the previous SPP/APR. If discrepancies occurred and the LEA with discrepancies had policies, procedures or practices that contributed to the significant discrepancy, as defined by the State, and that do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards, describe how the State ensured that such policies, procedures, and practices were revised to comply with applicable requirements consistent with OSEP Memorandum 23-01, dated July 24, 2023.

If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, improvement activities completed (e.g., review of policies and procedures, technical assistance, training) and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2024 SPP/APR, the data for FFY 2023), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

If the State did not issue any findings because it has adopted procedures that permit its LEAs to correct noncompliance prior to the State’s issuance of a finding (i.e., pre-finding correction), the explanation within each applicable indicator must include how the State verified, prior to issuing a finding, that the LEA has corrected each individual case of child-specific noncompliance and is correctly implementing the specific regulatory requirements.

Targets must be 0% for 4B.

4B - Indicator Data

Not Applicable

Select yes if this indicator is not applicable.

NO

Historical Data

Baseline Year	Baseline Data
2024	0.00%

FFY	2019	2020	2021	2022	2023
Target	0%	0%	0%	0%	0%
Data					

Targets

FFY	2024	2025
Target	0%	0%

FFY 2024 SPP/APR Data

Has the state established a minimum n/cell-size requirement? (yes/no)

YES

If yes, the State must provide a definition of its minimum n and/or cell size itself and a description thereof (e.g., a State’s n size of 15 represents the number of children with disabilities enrolled in an LEA, and a State’s cell size of 5 represents the number of children with disabilities, by race and ethnicity, who have received out-of-school suspensions and expulsions of more than 10 days within the LEA).

The SEA has set a minimum n-size of 20 and has set no cell size requirement. The minimum n-size represents students with disabilities in a particular racial/ethnic group enrolled in an LEA in the period for reporting (for FFY 2024 this is the 2023-24 school year). In order for an LEA to be included in analysis, there must be at least 20 students with disabilities in a particular racial/ethnic group enrolled in the LEA.

If yes, the State must also provide rationales for its minimum n and/or cell size, including why the definitions chosen are reasonable and based on stakeholder input, and how the definitions ensure that the State is appropriately analyzing and identifying LEAs with significant discrepancy.

The SEA conducted an in-depth analysis of similarly situated states based on region (Western Mountain), state population size, and state demographics. The results of this analysis were shared with stakeholders to provide feedback on the minimum population sizes. Based on the review of other states, the state identified several proposed options related to minimum cell and n-sizes. These options were presented to stakeholders for feedback and input.

Through presenting the SEA’s proposed options to stakeholders, the state received valuable input to move forward with establishing new minimum n-sizes and to remove the previous minimum cell size requirement. Stakeholders agreed that the minimum population sizes should be adjusted to ensure LEAs are included in analysis while also controlling for LEAs with small populations that might skew data.

Based on the feedback and input from stakeholders, as well as internal state discussions, the SEA elected to not set a minimum cell size requirement but chose to set a minimum n-size requirement of 20 students with disabilities in a particular racial/ethnic group. The rationale for setting no minimum cell size is that small populations of students with disabilities for many LEAs, in conjunction with the limited number of long-term suspensions/expulsions, results in most LEAs being excluded from analysis when setting minimum cell sizes. Indeed, over 90% of LEAs in the state do not report any long-term suspensions/expulsions for students with disabilities. A minimum cell size of just 1 would preclude the vast majority of LEAs from being included in the analysis.

The rationale for the minimum n-size of 20 students with disabilities in a particular racial/ethnic group is that very small student populations can lead to notable volatility in the data, which can indicate significant discrepancy when there may not be a systemic issue. By ensuring that at least 20 students with disabilities in a particular racial/ethnic group are enrolled, the state is mitigating the potential data volatility by including an appropriate sample of students to make meaningful determinations of significant discrepancy.

By setting a minimum n-size requirement of 20 students with disabilities in a particular racial/ethnic group, 39.85% of LEAs in the state were included in analysis. This is a substantial increase in the previous number of LEAs included in analysis based on minimum population sizes. This is also well above the 10% threshold that has been used by the Office of Special Education Programs (OSEP) to evaluate whether an appropriate number of LEAs were analyzed and identified with significant discrepancy. For all these reasons, including the stakeholder input, the SEA believes these new minimum population sizes are reasonable and ensure that the state is appropriately analyzing and identifying data for LEAs for significant discrepancy.

If yes, the State must also indicate whether the minimum n and/or cell size represents a change from the prior SPP/APR reporting period.
Yes

If yes, the State must provide an explanation why the minimum n and/or cell size was changed.

The SEA elected to revise the minimum cell and n-size requirements previously established prior to the FFY 2024 reporting period. This was based on the fact that no LEAs previously met the minimum cell and n-size requirements in Indicator 4B, which resulted in no LEAs being analyzed for significant discrepancy by racial/ethnic group. Using data analyses of similarly situated states, the SEA identified proposed revisions to the minimum population requirements. These proposed options were provided to stakeholders, who agreed with the option of revising the minimum population sizes. As such, beginning in FFY 2024 there is no longer a minimum cell size used, and the minimum n-size requirement is 20 students with disabilities in a particular racial/ethnic group.

If yes, the State may only include, in both the numerator and the denominator, LEAs that met the State-established n/cell size. If the State used a minimum n and/or cell size requirement, report the number of LEAs totally excluded from the calculation as a result of this requirement.

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Number of LEAs that have a significant discrepancy, by race or ethnicity	Number of those LEAs that have policies, procedure or practices that contribute to the significant discrepancy and do not comply with requirements	Number of LEAs that met the State's minimum n/cell-size	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
2	0	159		0%	0.00%	N/A	N/A

Choose one of the following comparison methodologies to determine whether significant discrepancies are occurring (34 CFR §300.170(a))

Compare the rates of suspensions and expulsions of greater than 10 days in a school year for children with IEPs among LEAs in the State

Were all races and ethnicities included in the review?

YES

State's definition of "significant discrepancy" and methodology

Number of years of data used = One year

Minimum cell size = none

Minimum n-size = 20 students with disabilities in a particular racial/ethnic group

Methodology = The state first determines the state rate of long-term suspensions/expulsions (out-of-school suspensions or expulsions of greater than 10 days) by dividing the number of students with disabilities with long-term suspensions/expulsions in the state by the total number of students with disabilities enrolled in the state. In FFY 2024, the state rate of long-term suspensions and expulsions was 0.27%.

After calculating the state data, the LEA-level data are calculated. The state calculates significant disproportionality for Indicator 4B by dividing the number of students with disabilities in a particular racial/ethnic group with long-term suspensions/expulsions in an LEA by the total number of students with disabilities in that racial/ethnic group enrolled in that same LEA. This provides a long-term suspension/expulsion rate that will be compared to other LEAs using the statewide data (aforementioned) and the applied state threshold.

Threshold = The significant discrepancy threshold is the long-term suspension/expulsion rate for the current reporting period plus four percentage points. In FFY 2024, this means the threshold for significant discrepancy is 4.27% (0.27% + 4.00). The rates of LEAs described above in "Methodology" are compared to the threshold and in FFY 2024 those LEAs with 4.27% or more of their students with disabilities in a particular racial/ethnic group experiencing long-term suspensions/expulsions were identified as having significant discrepancy.

FFY 2024 summary = In the FFY 2024 reporting period, two LEAs exceeded the state threshold of 4.27% of students with disabilities in a particular racial/ethnic group experiencing long-term suspensions/expulsions. Accordingly, there were two LEAs identified with significant discrepancy.

Provide additional information about this indicator (optional)

In FFY 2024, based on stakeholder input and feedback, the state redesigned the Indicator 4 methodology used for determining significant discrepancy. This included revising the minimum cell and n-size requirements, changing the comparison group to LEAs in the state, and changing the methodology and significant discrepancy threshold to use state long-term suspension/expulsion data. As such, this constitutes a change to methodology and the data for FFY 2024 are no longer comparable to the data from prior years. For this reason, the state reset the Indicator 4B baseline.

Review of Policies, Procedures, and Practices (completed in FFY 2024 using 2023-2024 data)

Provide a description of the review of policies, procedures, and practices relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.

As a broad process, the state conducts policies, procedures, and practices reviews for all LEAs determined to have significant discrepancies. These reviews entail analyzing LEA-established policies and procedures related to discipline for students with disabilities, development of functional behavioral assessments (FBAs) and behavior intervention plans (BIPs), mechanisms in individualized education programs (IEPs) to determine special factors related to behavior and behavior supports/services, and processes for manifestation determinations. The state considers and reviews other information on LEA policies and procedures as well, including interviews with LEA staff when appropriate. Further, the state also analyzes the practices of LEAs to determine efficacy in the implementation of the established policies and procedures. This practice review entails looking at student records. Consistent with the state’s overall monitoring process, the state selects 10% of students with disabilities who experienced out-of-school suspensions and expulsions for more than 10 days in the reporting period to verify compliance in the implementation of the regulatory requirements. Student data/documents reviewed include discipline logs, IEPs, FBAs/BIPs, manifestation determination documentation, and any other materials deemed pertinent.

For the two LEAs determined to have a significant discrepancy in FFY 2024, the state reviewed the LEAs’ published, board-approved discipline policies and procedures, specifically honing in on the procedures related to suspensions/expulsions of students with disabilities. Further, the state looked at the mechanisms established by the two LEAs to develop FBAs/BIPs and conduct manifestation determinations. The state also selected records for those students suspended/expelled for greater than 10 days. Through the review of both the LEA’s policies and procedures as well as the student record reviews to get evidence of practice, the state determined that the LEAs demonstrated compliance in policies, procedures, and practices related to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards. Accordingly, there were no instances of noncompliance with Part B requirements for Indicator 4B.

The State DID NOT identify noncompliance with Part B requirements as a result of the review required by 34 CFR §300.170(b)

Correction of Findings of Noncompliance Identified in FFY 2023

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
0	0	0	0

If procedures have been adopted that permit LEAs to correct noncompliance prior to the State’s issuance of a finding (i.e., pre-finding correction), describe how, for instances of noncompliance discovered in FFY 2023, the State verified: (1) that the source of noncompliance is correctly implementing the regulatory requirements; and, (2) each individual case of noncompliance was corrected.

N/A

Correction of Findings of Noncompliance Identified Prior to FFY 2023

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2023 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

4B - Prior FFY Required Actions

None

4B - OSEP Response

The State has revised the baseline for this indicator, using data from FFY 2024, and OSEP accepts that revision.

4B- Required Actions

Indicator 5: Education Environments (children 5 (Kindergarten) - 21)

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results indicator: Percent of children with IEPs aged 5 who are enrolled in kindergarten and aged 6 through 21 served:

- A. Inside the regular class 80% or more of the day;
- B. Inside the regular class less than 40% of the day; and
- C. In separate schools, residential facilities, or homebound/hospital placements.

(20 U.S.C. 1416(a)(3)(A))

Data Source

Same data as used for reporting to the Department under section 618 of the IDEA, using the definitions in ED Facts file specification FS002.

Measurement

- A. Percent = $\left[\frac{\text{(\# of children with IEPs aged 5 who are enrolled in kindergarten and aged 6 through 21 served inside the regular class 80\% or more of the day)}}{\text{(total \# of students aged 5 who are enrolled in kindergarten and aged 6 through 21 with IEPs)}}\right] \times 100$.
- B. Percent = $\left[\frac{\text{(\# of children with IEPs aged 5 who are enrolled in kindergarten and aged 6 through 21 served inside the regular class less than 40\% of the day)}}{\text{(total \# of students aged 5 who are enrolled in kindergarten and aged 6 through 21 with IEPs)}}\right] \times 100$.
- C. Percent = $\left[\frac{\text{(\# of children with IEPs aged 5 who are enrolled in kindergarten and aged 6 through 21 served in separate schools, residential facilities, or homebound/hospital placements)}}{\text{(total \# of students aged 5 who are enrolled in kindergarten and aged 6 through 21 with IEPs)}}\right] \times 100$.

Instructions

Sampling from the State's 618 data is not allowed.

States must report five-year-old children with disabilities who are enrolled in kindergarten in this indicator. Five-year-old children with disabilities who are enrolled in preschool programs are included in Indicator 6.

Describe the results of the calculations and compare the results to the target.

If the data reported in this indicator are not the same as the State's data reported under section 618 of the IDEA, explain.

5 - Indicator Data

Historical Data

Part	Baseline	FFY	2019	2020	2021	2022	2023
A	2019	Target >=		52.50%	52.60%	52.70%	52.80%
A	53.10%	Data	53.10%	54.60%	56.10%	57.66%	59.47%
B	2019	Target <=		11.10%	11.00%	10.90%	10.80%
B	10.67%	Data	10.67%	10.13%	9.86%	9.57%	9.07%
C	2019	Target <=		1.40%	1.30%	1.20%	1.10%
C	1.54%	Data	1.54%	1.36%	1.08%	1.12%	1.07%

Targets

FFY	2024	2025
Target A >=	52.90%	53.20%
Target B <=	10.70%	10.60%
Target C <=	1.00%	0.90%

Targets: Description of Stakeholder Input

The Special Education Advisory Panel (SEAP) in Montana has been in existence since 2013. The SEAP is made up of 16 members, seven of whom are parents of students with disabilities. The panel is fully vested and broadly representative of Montana. Many of the panel members serve in other agency or organization leadership positions or on advisory councils as the voice of students with disabilities. This enables the SEA to draw insight and advice from a diverse group of stakeholders with an understanding of Montana's unique needs and strengths.

In the 2024-25 and 2025-26 school years, the SEA asked for input on Indicators 3, 4, 9, and 10 from the SEAP. The SEA presented information on the SPP/APR as a whole and then dug into the specific indicators for feedback on targets and proposed methodological changes. The SEAP agreed with the SEA's proposal. Meeting minutes from discussions with SEAP as well as presentation materials have been posted publicly for all stakeholder review and input on the state website for SEAP: <https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education/Regulations-and-Guidance#10965413037-federal-requirements>.

In the spring of every school year, the SEA brings together parents, Montana's Parent Training and Information center the Montana Empowerment Center (MEC), the SEAP, and other state agencies for a joint partnership meeting. During this meeting the SEA reviews the APR submitted in February.

The SEA asks for suggestions on how to potentially improve the outcomes of the indicators along with doing a data drill down of the state data and district level data.

In addition to the above-mentioned stakeholders, the SEA worked with many other stakeholder groups that support students with disabilities. Those groups include but are not limited to:

Monthly Special Education Director's calls

Montana Council for Exceptional Children (MCEC) – presented on updates at the SEA, national level, and writing compliant special education paperwork

Vocational Rehabilitation and Blind Services – strengthening our secondary transition

Summer Institute

Montana Council of Administrators of Special Education (MCASE)

Higher Education Consortium (HEC)

Dawson Community College – assisted in setting up level 2 of the ParaPathways Program

CSPD Regional Directors

Montana Empowerment Center – Monthly meetings

Disability Rights Montana

Prepopulated Data

Source	Date	Description	Data
SY 2024-25 Children with Disabilities (IDEA) School Age (EDFacts file spec FS002; Data group 74)	07/30/2025	Total number of children with IEPs aged 5 (kindergarten) through 21	20,621
SY 2024-25 Children with Disabilities (IDEA) School Age (EDFacts file spec FS002; Data group 74)	07/30/2025	A. Number of children with IEPs aged 5 (kindergarten) through 21 inside the regular class 80% or more of the day	12,464
SY 2024-25 Children with Disabilities (IDEA) School Age (EDFacts file spec FS002; Data group 74)	07/30/2025	B. Number of children with IEPs aged 5 (kindergarten) through 21 inside the regular class less than 40% of the day	1,884
SY 2024-25 Children with Disabilities (IDEA) School Age (EDFacts file spec FS002; Data group 74)	07/30/2025	c1. Number of children with IEPs aged 5 (kindergarten) through 21 in separate schools	138
SY 2024-25 Children with Disabilities (IDEA) School Age (EDFacts file spec FS002; Data group 74)	07/30/2025	c2. Number of children with IEPs aged 5 (kindergarten) through 21 in residential facilities	55
SY 2024-25 Children with Disabilities (IDEA) School Age (EDFacts file spec FS002; Data group 74)	07/30/2025	c3. Number of children with IEPs aged 5 (kindergarten) through 21 in homebound/hospital placements	25

Select yes if the data reported in this indicator are not the same as the State's data reported under section 618 of the IDEA.

NO

FFY 2024 SPP/APR Data

Education Environments	Number of children with IEPs aged 5 (kindergarten) through 21 served	Total number of children with IEPs aged 5 (kindergarten) through 21	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
A. Number of children with IEPs aged 5 (kindergarten) through 21 inside the regular class 80% or more of the day	12,464	20,621	59.47%	52.90%	60.44%	Met target	No Slippage

Education Environments	Number of children with IEPs aged 5 (kindergarten) through 21 served	Total number of children with IEPs aged 5 (kindergarten) through 21	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
B. Number of children with IEPs aged 5 (kindergarten) through 21 inside the regular class less than 40% of the day	1,884	20,621	9.07%	10.70%	9.14%	Met target	No Slippage
C. Number of children with IEPs aged 5 (kindergarten) through 21 inside separate schools, residential facilities, or homebound/hospital placements [c1+c2+c3]	218	20,621	1.07%	1.00%	1.06%	Did not meet target	No Slippage

Provide additional information about this indicator (optional)

N/A

5 - Prior FFY Required Actions

None

5 - OSEP Response

5 - Required Actions

Indicator 6: Preschool Environments

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results indicator: Percent of children with IEPs aged 3, 4, and aged 5 who are enrolled in a preschool program attending a:

- A. Regular early childhood program and receiving the majority of special education and related services in the regular early childhood program; and
- B. Separate special education class, separate school, or residential facility.
- C. Receiving special education and related services in the home.

(20 U.S.C. 1416(a)(3)(A))

Data Source

Same data as used for reporting to the Department under section 618 of the IDEA, using the definitions in ED*Facts* file specification FS089.

Measurement

- A. Percent = [(# of children ages 3, 4, and 5 with IEPs attending a regular early childhood program and receiving the majority of special education and related services in the regular early childhood program) divided by the (total # of children ages 3, 4, and 5 with IEPs)] times 100.
- B. Percent = [(# of children ages 3, 4, and 5 with IEPs attending a separate special education class, separate school, or residential facility) divided by the (total # of children ages 3, 4, and 5 with IEPs)] times 100.
- C. Percent = [(# of children ages 3, 4, and 5 with IEPs receiving special education and related services in the home) divided by the (total # of children ages 3, 4, and 5 with IEPs)] times 100.

Instructions

Sampling from the State's 618 data is not allowed.

States must report five-year-old children with disabilities who are enrolled in preschool programs in this indicator. Five-year-old children with disabilities who are enrolled in kindergarten are included in Indicator 5.

States may choose to set one target that is inclusive of children ages 3, 4, and 5, or set individual targets for each age.

For Indicator 6C: States are not required to establish a baseline or targets if the number of children receiving special education and related services in the home is less than 10, regardless of whether the State chooses to set one target that is inclusive of children ages 3, 4, and 5, or set individual targets for each age. In a reporting period during which the number of children receiving special education and related services in the home reaches 10 or greater, States are required to develop baseline and targets and report on them in the corresponding SPP/APR.

For Indicator 6C: States may express their targets in a range (e.g., 75-85%).

Describe the results of the calculations and compare the results to the target.

If the data reported in this indicator are not the same as the State's data reported under IDEA section 618, explain.

6 - Indicator Data

Not Applicable

Select yes if this indicator is not applicable.

NO

Historical Data (Inclusive) – 6A, 6B, 6C

Part	FFY	2019	2020	2021	2022	2023
A	Target >=		45.10%	45.20%	45.30%	45.50%
A	Data	29.99%	28.28%	30.01%	33.05%	33.16%
B	Target <=		27.50%	27.40%	27.30%	27.20%
B	Data	44.32%	48.05%	48.77%	43.54%	40.70%
C	Target <=					1.56%
C	Data		0.92%	0.65%	0.73%	1.56%

Targets: Description of Stakeholder Input

The Special Education Advisory Panel (SEAP) in Montana has been in existence since 2013. The SEAP is made up of 16 members, seven of whom are parents of students with disabilities. The panel is fully vested and broadly representative of Montana. Many of the panel members serve in other agency or organization leadership positions or on advisory councils as the voice of students with disabilities. This enables the SEA to draw insight and advice from a diverse group of stakeholders with an understanding of Montana's unique needs and strengths.

In the 2024-25 and 2025-26 school years, the SEA asked for input on Indicators 3, 4, 9, and 10 from the SEAP. The SEA presented information on the SPP/APR as a whole and then dug into the specific indicators for feedback on targets and proposed methodological changes. The SEAP agreed with the SEA's proposal. Meeting minutes from discussions with SEAP as well as presentation materials have been posted publicly for all stakeholder review and input on the state website for SEAP: <https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education/Regulations-and-Guidance#10965413037-federal-requirements>.

In the spring of every school year, the SEA brings together parents, Montana’s Parent Training and Information center the Montana Empowerment Center (MEC), the SEAP, and other state agencies for a joint partnership meeting. During this meeting the SEA reviews the APR submitted in February. The SEA asks for suggestions on how to potentially improve the outcomes of the indicators along with doing a data drill down of the state data and district level data.

- In addition to the above-mentioned stakeholders, the SEA worked with many other stakeholder groups that support students with disabilities. Those groups include but are not limited to:
- Monthly Special Education Director’s calls
 - Montana Council for Exceptional Children (MCEC) – presented on updates at the SEA, national level, and writing compliant special education paperwork
 - Vocational Rehabilitation and Blind Services – strengthening our secondary transition
 - Summer Institute
 - Montana Council of Administrators of Special Education (MCASE)
 - Higher Education Consortium (HEC)

Dawson Community College – assisted in setting up level 2 of the ParaPathways Program

- CSPD Regional Directors
- Montana Empowerment Center – Monthly meetings
- Disability Rights Montana

Targets

Please select if the State wants to set baselines and targets based on individual age ranges (i.e., separate baseline and targets for each age), or inclusive of all children ages 3, 4, and 5.

- Inclusive Targets
- Please select if the State wants to use target ranges for 6C.
- Target Range not used

Baselines for Inclusive Targets option (A, B, C)

Part	Baseline Year	Baseline Data
A	2019	29.99%
B	2019	44.32%
C	2023	1.56%

Inclusive Targets – 6A, 6B

FFY	2024	2025
Target A >=	45.50%	45.60%
Target B <=	27.10%	27.00%

Inclusive Targets – 6C

FFY	2024	2025
Target C <=	1.56%	1.56%

Prepopulated Data

Data Source:
SY 2024-25 Children with Disabilities (IDEA) Early Childhood (EDFacts file spec FS089; Data group 613)

Date:
07/30/2025

Description	3	4	5	3 through 5 - Total
Total number of children with IEPs	249	524	152	925

Description	3	4	5	3 through 5 - Total
a1. Number of children attending a regular early childhood program and receiving the majority of special education and related services in the regular early childhood program	63	191	62	316
b1. Number of children attending separate special education class	118	202	55	375
b2. Number of children attending separate school	12	14	3	29
b3. Number of children attending residential facility	0	0	0	0
c1. Number of children receiving special education and related services in the home	1	0	1	2

Select yes if the data reported in this indicator are not the same as the State's data reported under section 618 of the IDEA.

NO

FFY 2024 SPP/APR Data - Aged 3 through 5

Preschool Environments	Number of children with IEPs aged 3 through 5 served	Total number of children with IEPs aged 3 through 5	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
A. A regular early childhood program and receiving the majority of special education and related services in the regular early childhood program	316	925	33.16%	45.50%	34.16%	Did not meet target	No Slippage
B. Separate special education class, separate school, or residential facility	404	925	40.70%	27.10%	43.68%	Did not meet target	Slippage
C. Home	2	925	1.56%	1.56%	0.22%	Met target	No Slippage

Provide reasons for slippage for Group B aged 3 through 5, if applicable

In the FFY 2024 reporting period, Indicator 6B saw slippage of 2.98 percentage points. The SEA analyzed the data to determine the reasons for the identified slippage. First, the state observed a notable increase in the number of preschool students with disabilities enrolled and receiving services from FFY 2023 to FFY 2024. The percent change from FFY 2023 to FFY 2024 in the total preschool students with disabilities population was 20.29%. This is a historically high number of preschool students with disabilities receiving special education and related services in the state. The increase in population of students in Indicator 6B, without a commensurate increase in regular early childhood programs and classroom seats, has led to students needing to be served in other locations outside of regular early childhood programs. In many cases, these regular early childhood programs lack the room or capacity to serve a large influx in student population. Accordingly, this increase in the population of preschool students with disabilities likely contributed to the increase in the percentage of preschool students with disabilities attending more restrictive settings like separate classes and separate schools (the state had no preschool students in a residential facility).

Additionally, the state investigated whether educational environment changes in particular LEAs may have contributed to the broader state data and slippage. Three of the largest LEAs in the state had substantial increases in the number of students reported in Indicator 6B. These LEAs accounted for 22.27% of the preschool students with disabilities captured in Indicator 6B for FFY 2024 and the population of students for Indicator 6B in these LEAs nearly doubled from FFY 2023 to FFY 2024 (had a percentage change of 80.70%). When excluding data for the three largest LEAs from analysis of Indicator 6B, the Indicator 6B percentage is 30.08%. As such, these three LEAs in which large population increases occurred for educational environments under Indicator 6B likely contributed to the overall state slippage for this indicator.

Provide additional information about this indicator (optional)

N/A

6 - Prior FFY Required Actions

None

6 - OSEP Response

6 - Required Actions

Indicator 7: Preschool Outcomes

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results indicator: Percent of preschool children aged 3 through 5 with IEPs who demonstrate improved:

- A. Positive social-emotional skills (including social relationships);
- B. Acquisition and use of knowledge and skills (including early language/ communication and early literacy); and
- C. Use of appropriate behaviors to meet their needs.

(20 U.S.C. 1416 (a)(3)(A))

Data Source

State selected data source.

Measurement

Outcomes:

- A. Positive social-emotional skills (including social relationships);
- B. Acquisition and use of knowledge and skills (including early language/communication and early literacy); and
- C. Use of appropriate behaviors to meet their needs.

Progress categories for A, B and C:

- a. Percent of preschool children who did not improve functioning = [(# of preschool children who did not improve functioning) divided by (# of preschool children with IEPs assessed)] times 100.
- b. Percent of preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers = [(# of preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers) divided by (# of preschool children with IEPs assessed)] times 100.
- c. Percent of preschool children who improved functioning to a level nearer to same-aged peers but did not reach it = [(# of preschool children who improved functioning to a level nearer to same-aged peers but did not reach it) divided by (# of preschool children with IEPs assessed)] times 100.
- d. Percent of preschool children who improved functioning to reach a level comparable to same-aged peers = [(# of preschool children who improved functioning to reach a level comparable to same-aged peers) divided by (# of preschool children with IEPs assessed)] times 100.
- e. Percent of preschool children who maintained functioning at a level comparable to same-aged peers = [(# of preschool children who maintained functioning at a level comparable to same-aged peers) divided by (# of preschool children with IEPs assessed)] times 100.

Summary Statements for Each of the Three Outcomes:

Summary Statement 1: Of those preschool children who entered the preschool program below age expectations in each Outcome, the percent who substantially increased their rate of growth by the time they turned 6 years of age or exited the program.

Measurement for Summary Statement 1: Percent = [(# of preschool children reported in progress category (c) plus # of preschool children reported in category (d)) divided by ((# of preschool children reported in progress category (a) plus # of preschool children reported in progress category (b) plus # of preschool children reported in progress category (c) plus # of preschool children reported in progress category (d))] times 100.

Summary Statement 2: The percent of preschool children who were functioning within age expectations in each Outcome by the time they turned 6 years of age or exited the program.

Measurement for Summary Statement 2: Percent = [(# of preschool children reported in progress category (d) plus # of preschool children reported in progress category (e)) divided by ((the total # of preschool children reported in progress categories (a) + (b) + (c) + (d) + (e))] times 100.

Instructions

Sampling of **children for assessment** is allowed. When sampling is used, submit a description of the sampling methodology outlining how the design will yield valid and reliable estimates. (See [General Instructions](#) on page 3 for additional instructions on sampling.)

In the measurement include, in the numerator and denominator, only children who received special education and related services for at least six months during the age span of three through five years.

Describe the results of the calculations and compare the results to the targets. States will use the progress categories for each of the three Outcomes to calculate and report the two Summary Statements. States have provided targets for the two Summary Statements for the three Outcomes (six numbers for targets for each FFY).

Report progress data and calculate Summary Statements to compare against the six targets. Provide the actual numbers and percentages for the five reporting categories for each of the three Outcomes.

In presenting results, provide the criteria for defining "comparable to same-aged peers." If a State is using the Early Childhood Outcomes Center (ECO) Child Outcomes Summary (COS), then the criteria for defining "comparable to same-aged peers" has been defined as a child who has been assigned a score of 6 or 7 on the COS.

In addition, list the instruments and procedures used to gather data for this indicator, including if the State is using the ECO COS.

7 - Indicator Data

Not Applicable

Select yes if this indicator is not applicable.

NO

Historical Data

Part	Baseline	FFY	2019	2020	2021	2022	2023
A1	2008	Target >=	77.00%	77.00%	77.10%	77.20%	77.30%
A1	61.40%	Data	80.00%	86.59%	93.55%	79.31%	80.82%

A2	2008	Target >=	75.50%	75.50%	75.60%	75.70%	75.80%
A2	59.20%	Data	68.11%	71.64%	75.22%	71.52%	71.88%
B1	2008	Target >=	81.00%	81.00%	81.10%	81.20%	81.30%
B1	70.30%	Data	84.48%	81.60%	89.11%	75.19%	76.47%
B2	2008	Target >=	58.50%	58.50%	58.60%	58.70%	58.80%
B2	31.60%	Data	58.38%	55.97%	57.52%	55.63%	53.13%
C1	2008	Target >=	75.90%	75.90%	76.00%	76.10%	76.20%
C1	58.10%	Data	79.46%	84.34%	96.77%	79.12%	75.00%
C2	2008	Target >=	75.90%	75.90%	76.00%	76.10%	76.20%
C2	64.10%	Data	70.27%	68.66%	76.99%	70.20%	72.66%

Targets

FFY	2024	2025
Target A1 >=	77.40%	77.50%
Target A2 >=	75.90%	76.00%
Target B1 >=	81.50%	81.50%
Target B2 >=	59.00%	59.00%
Target C1 >=	76.40%	76.40%
Target C2 >=	76.40%	76.40%

Targets: Description of Stakeholder Input

The Special Education Advisory Panel (SEAP) in Montana has been in existence since 2013. The SEAP is made up of 16 members, seven of whom are parents of students with disabilities. The panel is fully vested and broadly representative of Montana. Many of the panel members serve in other agency or organization leadership positions or on advisory councils as the voice of students with disabilities. This enables the SEA to draw insight and advice from a diverse group of stakeholders with an understanding of Montana's unique needs and strengths.

In the 2024-25 and 2025-26 school years, the SEA asked for input on Indicators 3, 4, 9, and 10 from the SEAP. The SEA presented information on the SPP/APR as a whole and then dug into the specific indicators for feedback on targets and proposed methodological changes. The SEAP agreed with the SEA's proposal. Meeting minutes from discussions with SEAP as well as presentation materials have been posted publicly for all stakeholder review and input on the state website for SEAP: <https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education/Regulations-and-Guidance#10965413037-federal-requirements>.

In the spring of every school year, the SEA brings together parents, Montana's Parent Training and Information center the Montana Empowerment Center (MEC), the SEAP, and other state agencies for a joint partnership meeting. During this meeting the SEA reviews the APR submitted in February. The SEA asks for suggestions on how to potentially improve the outcomes of the indicators along with doing a data drill down of the state data and district level data.

In addition to the above-mentioned stakeholders, the SEA worked with many other stakeholder groups that support students with disabilities. Those groups include but are not limited to:

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CSPD Regional Directors

Montana Empowerment Center – Monthly meetings

Disability Rights Montana

FFY 2024 SPP/APR Data
Number of preschool children aged 3 through 5 with IEPs assessed

133

Outcome A: Positive social-emotional skills (including social relationships)

Outcome A Progress Category	Number of children	Percentage of Children
a. Preschool children who did not improve functioning	0	0.00%
b. Preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	17	12.78%
c. Preschool children who improved functioning to a level nearer to same-aged peers but did not reach it	28	21.05%
d. Preschool children who improved functioning to reach a level comparable to same-aged peers	34	25.56%
e. Preschool children who maintained functioning at a level comparable to same-aged peers	54	40.60%

Outcome A	Numerator	Denominator	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
A1. Of those children who entered or exited the program below age expectations in Outcome A, the percent who substantially increased their rate of growth by the time they turned 6 years of age or exited the program. <i>Calculation: $(c+d)/(a+b+c+d)$</i>	62	79	80.82%	77.40%	78.48%	Met target	No Slippage
A2. The percent of preschool children who were functioning within age expectations in Outcome A by the time they turned 6 years of age or exited the program. <i>Calculation: $(d+e)/(a+b+c+d+e)$</i>	88	133	71.88%	75.90%	66.17%	Did not meet target	Slippage

Outcome B: Acquisition and use of knowledge and skills (including early language/communication)

Outcome B Progress Category	Number of Children	Percentage of Children
a. Preschool children who did not improve functioning	0	0.00%
b. Preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	29	21.80%
c. Preschool children who improved functioning to a level nearer to same-aged peers but did not reach it	46	34.59%
d. Preschool children who improved functioning to reach a level comparable to same-aged peers	50	37.59%
e. Preschool children who maintained functioning at a level comparable to same-aged peers	8	6.02%

Outcome B	Numerator	Denominator	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
B1. Of those children who entered or exited the program below age expectations in Outcome B, the percent who substantially increased their rate of growth by the time they turned 6 years of age or exited the program.	96	125	76.47%	81.50%	76.80%	Did not meet target	No Slippage

Outcome B	Numerator	Denominator	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
<i>Calculation:</i> $(c+d)/(a+b+c+d)$							
B2. The percent of preschool children who were functioning within age expectations in Outcome B by the time they turned 6 years of age or exited the program. <i>Calculation:</i> $(d+e)/(a+b+c+d+e)$	58	133	53.13%	59.00%	43.61%	Did not meet target	Slippage

Outcome C: Use of appropriate behaviors to meet their needs

Outcome C Progress Category	Number of Children	Percentage of Children
a. Preschool children who did not improve functioning	0	0.00%
b. Preschool children who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers	15	11.28%
c. Preschool children who improved functioning to a level nearer to same-aged peers but did not reach it	33	24.81%
d. Preschool children who improved functioning to reach a level comparable to same-aged peers	32	24.06%
e. Preschool children who maintained functioning at a level comparable to same-aged peers	53	39.85%

Outcome C	Numerator	Denominator	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
C1. Of those children who entered or exited the program below age expectations in Outcome C, the percent who substantially increased their rate of growth by the time they turned 6 years of age or exited the program. <i>Calculation:</i> $(c+d)/(a+b+c+d)$	65	80	75.00%	76.40%	81.25%	Met target	No Slippage
C2. The percent of preschool children who were functioning within age expectations in Outcome C by the time they turned 6 years of age or exited the program. <i>Calculation:</i> $(d+e)/(a+b+c+d+e)$	85	133	72.66%	76.40%	63.91%	Did not meet target	Slippage

Part	Reasons for slippage, if applicable
A2	The decrease in performance for Outcome A, Summary Statement 2 (A2) from FFY 2023 to FFY 2024 was 5.71 percentage points. The state conducted data analysis to determine the reason for the decrease and subsequent slippage and determined that one of the most notable reasons was the difference in entrance ratings for preschool students in FFY 2023 compared to FFY 2024. Indeed, in FFY 2023, 46.09% of the preschool students received an entrance Child Outcomes Summary (COS) rating of 6 or 7 (overall age-expected functioning). This was nearly 4 percentage points higher than the same entrance ratings for preschool students in FFY 2024 (42.11% of preschool students in FFY 2024 received entrance COS ratings of 6 or 7). Accordingly, in FFY 2024 there was a larger percentage of preschool students entering preschool not within the age-expected functioning range, thus necessitating much more substantial growth from entrance to exit in order to meet criteria for age-expected functioning. It is much more challenging to enter preschool with a COS rating of 2 and attain an exit COS rating of 6 or 7 as compared to entering preschool with a COS rating of 5 and attaining an exit COS rating of 6 or 7. Accordingly, fewer preschool students were able to exit functioning within age expectations in FFY 2024 as compared to FFY 2023, due in part to the lower COS ratings assigned upon entrance. The fact that preschool students had entrance COS ratings that were lower in FFY 2024 could be a lingering impact of COVID. Students exiting preschool or turning 6 years old during the 2024-25 may have been eligible for preschool or for early intervention programs during the years of 2020-2022. If, due to health concerns, preschool or early intervention providers had limited ability to provide services or parents declined services due to health concerns (which was observed), children may not have had exposure to social-emotional skills, including social relationships, in foundational years. Thus, these children may not have as readily acquired the social-emotional skills that

Part	Reasons for slippage, if applicable
	are the focus of Outcome A. This is supported by the decrease in performance on this indicator over the prior three years. Additionally, in slippage analyses the state observed an overall decrease in performance on A2 for 5 LEAs in the state. One of these was among the larger LEAs in the state and comprised 12.78% of the statewide data for Indicator 7. The large population of this LEA resulted in more substantial impacts on the statewide data, thus likely contributing to the overall slippage for this indicator.
B2	The decrease in performance for Outcome B, Summary Statement 2 (B2) from FFY 2023 to FFY 2024 was 9.52 percentage points. The state conducted data analysis to determine the reason for the decrease and subsequent slippage using similar analysis as described in the slippage statement for A2. Interestingly, there was a very small increase (count of 3 records) in the number preschool students who received an entrance COS rating of 6 or 7 (overall age-expected functioning), which differs from what was found in A2. However, when looking at the lowest COS entrance ratings of 1-3, the state observed an increase of 26.47% from FFY 2023 to FFY 2024. Accordingly, in FFY 2024 there was a larger percentage of preschool students entering preschool with skills well below age-expected functioning, thus necessitating much more substantial growth from entrance to exit in order to meet criteria for age-expected functioning. It is much more challenging to enter preschool with a COS rating of 2 and attain an exit COS rating of 6 or 7 as compared to entering preschool with a COS rating of 5 and attaining an exit COS rating of 6 or 7. Accordingly, fewer preschool students were able to exit functioning within age expectations in FFY 2024 as compared to FFY 2023, due in part to the lower COS ratings assigned upon entrance. As noted in the slippage statement for A2, the fact that more preschool students had entrance COS ratings of 1-3 in FFY 2024 than in FFY 2023 could be a lingering impact of COVID. Students exiting preschool or turning 6 years old during the 2024-25 may have been eligible for preschool or for early intervention programs during the years of 2020-2022. If, due to health concerns, preschool or early intervention providers had limited ability to provide services or parents declined services due to health concerns (which was observed), children may not have had exposure to knowledge and skills in foundational years that limited their ability to acquire and use these skills upon entering preschool. Thus, these children may not have as readily acquired and used the knowledge and skills – including language skills - that are the focus of Outcome B. This is supported by the decrease in performance on this indicator over the prior three years. Additionally, in slippage analyses the state observed an overall decrease in performance on B2 for 8 LEAs in the state. Two of these were among the larger LEAs in the state and comprised 24.81% of the statewide data for Indicator 7. The large population of these LEAs resulted in more substantial impacts on the statewide data, thus likely contributing to the overall slippage for this indicator.
C2	The decrease in performance for Outcome C, Summary Statement 2 (C2) from FFY 2023 to FFY 2024 was 8.75 percentage points. The state conducted data analysis to determine the reason for the decrease and subsequent slippage using similar analysis as described in the slippage statements for A2 and B2. For C2, the state observed an overall decrease of 8.33% in the number of preschool students who received an entrance COS rating of 6 or 7 (overall age-expected functioning), similar to what was found in the slippage statement for A2. Additionally, when looking at the lowest COS entrance ratings of 1-3, the state observed an increase of 20.69% from FFY 2023 to FFY 2024, similar to what was found in the slippage statement for B2. This confluence of factors resulted in a larger percentage of preschool students entering preschool with skills well below age-expected functioning in FFY 2024, thus necessitating much more substantial growth from entrance to exit in order to meet criteria for age-expected functioning. It is much more challenging to enter preschool with a COS rating of 2 and attain an exit COS rating of 6 or 7 as compared to entering preschool with a COS rating of 5 and attaining an exit COS rating of 6 or 7. Accordingly, fewer preschool students were able to exit functioning within age expectations in FFY 2024 as compared to FFY 2023, due in part to the lower COS ratings assigned upon entrance. As noted in the slippage statements for A2 and B2, the fact that fewer preschool students had entrance ratings of 6 and 7 and more preschool students had entrance COS ratings of 1-3 in FFY 2024 as compared to FFY 2023 could be a lingering impact of COVID. Students exiting preschool or turning 6 years old during the 2024-25 may have been eligible for preschool or for early intervention programs during the years of 2020-2022. If, due to health concerns, preschool or early intervention providers had limited ability to provide services or parents declined services due to health concerns (which was observed), children may not have had exposure to use of appropriate behaviors foundational years that limited their ability to acquire and use these skills to meet their needs upon entering preschool. This is supported by the decrease in performance on this indicator over the prior three years.

Does the State include in the numerator and denominator only children who received special education and related services for at least six months during the age span of three through five years? (yes/no)

YES

Sampling Question	Yes / No
Was sampling used?	NO

Did you use the Early Childhood Outcomes Center (ECO) Child Outcomes Summary (COS) process? (yes/no)

YES

List the instruments and procedures used to gather data for this indicator.

Montana uses a standardized required editor-based reporting form to collect entering and exiting preschool outcomes data. The form is included in our special education module within our state-wide student data system, along with all required special education forms. The report is run by the Part B data manager.

Provide additional information about this indicator (optional)

7 - Prior FFY Required Actions

None

7 - OSEP Response

7 - Required Actions

Indicator 8: Parent involvement

Instructions and Measurement

Monitoring Priority: FAPE in the LRE

Results indicator: Percent of parents with a child receiving special education services who report that schools facilitated parent involvement as a means of improving services and results for children with disabilities.

(20 U.S.C. 1416(a)(3)(A))

Data Source

State selected data source.

Measurement

Percent = [(# of respondent parents who report schools facilitated parent involvement as a means of improving services and results for children with disabilities) divided by the (total # of respondent parents of children with disabilities)] times 100.

Instructions

Sampling of parents from whom response is requested is allowed. When sampling is used, submit a description of the sampling methodology outlining how the design will yield valid and reliable estimates. (See General Instructions on page 3 for additional instructions on sampling.)

Describe the results of the calculations and compare the results to the target.

Provide the actual numbers used in the calculation.

If the State is using a separate data collection methodology for preschool children, the State must provide separate baseline data, targets, and actual target data or discuss the procedures used to combine data from school age and preschool data collection methodologies in a manner that is valid and reliable.

While a survey is not required for this indicator, a State using a survey must submit a copy of any new or revised survey with its SPP/APR.

Report the number of parents to whom the surveys were distributed and the number of respondent parents. The survey response rate is automatically calculated using the submitted data.

States must compare the response rate for the reporting year to the response rate for the previous year (e.g., in the FFY 2024 SPP/APR, compare the FFY 2024 response rate to the FFY 2023 response rate) and describe strategies that will be implemented which are expected to increase the response rate, particularly for those groups that are underrepresented.

The State must also analyze the response rate to identify potential nonresponse bias and take steps to reduce any identified bias and promote response from a broad cross-section of parents of children with disabilities.

Include in the State's analysis the extent to which the demographics of the children for whom parents responded are representative of the demographics of children receiving special education services. States must consider race/ethnicity. In addition, the State's analysis must also include at least one of the following demographics: age of the student, disability category, gender, geographic location, and/or another demographic category approved through the stakeholder input process.

States must describe the metric used to determine representativeness (e.g., +/- 3% discrepancy in the proportion of responders compared to target group).

If the analysis shows that the demographics of the children for whom parents responding are not representative of the demographics of children receiving special education services in the State, describe the strategies that the State will use to ensure that in the future the response data are representative of those demographics. In identifying such strategies, the State should consider factors such as how the State distributed the survey to parents (e.g., by mail, by e-mail, on-line, by telephone, in-person through school personnel), and how responses were collected.

States are encouraged to work in collaboration with their OSEP-funded parent centers in collecting data.

8 - Indicator Data

Question	Yes / No
Do you use a separate data collection methodology for preschool children?	NO

Targets: Description of Stakeholder Input

The Special Education Advisory Panel (SEAP) in Montana has been in existence since 2013. The SEAP is made up of 16 members, seven of whom are parents of students with disabilities. The panel is fully vested and broadly representative of Montana. Many of the panel members serve in other agency or organization leadership positions or on advisory councils as the voice of students with disabilities. This enables the SEA to draw insight and advice from a diverse group of stakeholders with an understanding of Montana's unique needs and strengths.

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In addition to the above-mentioned stakeholders, the SEA worked with many other stakeholder groups that support students with disabilities. Those groups include but are not limited to:

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Historical Data

Baseline Year	Baseline Data
2023	86.42%

FFY	2019	2020	2021	2022	2023
Target >=	70.50%	70.50%	70.60%	70.70%	86.42%
Data	79.05%	73.35%	65.66%	71.46%	86.42%

Targets

FFY	2024	2025
Target >=	87.17%	87.92%

FFY 2024 SPP/APR Data

Number of respondent parents who report schools facilitated parent involvement as a means of improving services and results for children with disabilities	Total number of respondent parents of children with disabilities	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
1,621	1,909	86.42%	87.17%	84.91%	Did not meet target	Slippage

Provide reasons for slippage, if applicable

The decrease in performance for Indicator 8 from FFY 2023 to FFY 2024 was 1.51 percentage points. The state conducted data analysis to determine the reason for the decrease and subsequent slippage. Through this analysis, the state observed a notable decrease in the percentage of respondent parents reporting schools facilitated parent involvement for 3 of the largest LEAs in the state. These 3 LEAs comprised 12.84% of the total statewide student population in FFY 2024 and comprised 11.79% of the respondent population for Indicator 8 in FFY 2024. In these 3 LEAs, the percent of respondent parents reporting schools facilitated parental involvement decreased by 11.31 percentage points from FFY 2023 to FFY 2024. This significant decrease in performance for Indicator 8 had a notable impact on the statewide data, given that the 3 large LEAs make up such a large portion of the overall state population and Indicator 8 population. As such, a reason for the slippage is the overall decrease in performance for the 3 large LEAs. Were these 3 LEAs excluded from the statewide data, the percentage of respondent parents reporting schools facilitated parent involvement would increase to 86.05% for FFY 2024. This would be a very small decrease in performance from FFY 2023 (0.37 percentage points) and would not result in slippage for the indicator.

Since the State did not report preschool children separately, discuss the procedures used to combine data from school age and preschool surveys in a manner that is valid and reliable.

Parents of students with disabilities, including preschool students, are given an opportunity to complete the survey. LEAs are responsible for administering the survey to all their parents of students with disabilities ages 3-21. LEAs are provided with the necessary materials to administer the survey either in person (at IEP meetings, parent-teacher conferences, and community functions), via text message, or via email. The materials direct parents to an online portal to respond to the survey. These materials and the processes are the same for parents of students with disabilities in preschool and K-12 programs. The survey that parents of preschool students receive is identical to the survey that parents of K-12 students receive, which creates continuity across all grade bands. The same distribution methods are used for both groups of parents and the same data collation methods are used to aggregate and analyze the results. While the results can be disaggregated between the parents of preschool students and parents of K-12 students, the surveys are not different, and results are automatically combined. These efforts to ensure that responses from parents of preschool and K-12 students are identical in all design, data collection, and data analysis methods and the state is confident these measures are taken in a manner that is valid and reliable.

The number of parents to whom the surveys were distributed.

22,051

Percentage of respondent parents

8.66%

Response Rate

FFY	2023	2024
Response Rate	7.41%	8.66%

Describe the metric used to determine representativeness (e.g., +/- 3% discrepancy in the proportion of responders compared to target group).

The metric used to determine representativeness is +/- 3% discrepancy in the proportion of responders compared to the population of a given target group.

Include the State's analyses of the extent to which the demographics of the children for whom parents responded are representative of the demographics of children receiving special education services. States must include race/ethnicity in their analysis. In addition, the State's analysis must also include at least one of the following demographics: age of the student, disability category, gender, geographic location, and/or another demographic category approved through the stakeholder input process.

The state compared the representation by race/ethnicity and primary disability in the population to the representation in the respondents using a +/- 3% criteria to identify over-or under-representativeness.

Using this methodology, differences were found by race/ethnicity and primary disability. Two racial/ethnic groups were not representative. Seventy-two percent (72%) of students with disabilities in the state are white, while 80% of the survey respondents were parents of white students with disabilities (+8 percentage points). Thirteen percent (13%) of students with disabilities in the state are American Indian, while 6% of the survey respondents were parents of American Indian students with disabilities (-7 percentage points). All other racial/ethnic groups were within 3 percentage points of their population.

In terms of primary disability groups, there were two disability categories that were not representative. Six percent (6%) of students with disabilities in the state are identified with autism, while nearly 16% of the respondents were parents of students identified with autism (+10 percentage points). Twenty-one percent (21%) of students with disabilities in the state are identified with multiple disabilities, while 8% of the respondents were parents of students identified with multiple disabilities (-13 percentage points). All other primary disability groups were within 3 percentage points of their population. Eleven percent (11%) of students with disabilities in the state are identified with other health impairments, while 7% of the respondents were parents of students identified with other health impairments (-4 percentage points). Seventeen percent (17%) of students with disabilities in the state are identified with a speech/language impairment, while 22% of the respondents were parents of students identified with a speech/language impairment (-5 percentage points). All other primary disability groups were within 3 percentage points of their population.

The demographics of the children for whom parents are responding are representative of the demographics of children receiving special education services. (yes/no)

NO

If no, describe the strategies that the State will use to ensure that in the future the response data are representative of those demographics.

Given the lower response rate of parents of American Indian students, the state will be encouraging all districts to follow-up with these parents throughout the survey administration window. Those districts that have a relatively high percentage of Native American students will be encouraged to use multiple administrative methods. The state will reach out to individual districts special education directors and/or superintendents, including those with high Native American student, and encourage the schools to share the survey with parents. The state will work more closely with the Montana Empowerment Center (MEC, parent training and information center) to assist the state in encouraging parents to fill out the survey.

Describe strategies that will be implemented which are expected to increase the response rate year over year, particularly for those groups that are underrepresented.

In 2023-24, the state moved from a sample of a districts to a census survey, decreased the number of questions asked from 23 to 10, moved from paper to electronic, and moved away from English only by adding Spanish and Braille. All these efforts were undertaken to make the survey more accessible to all families with the intent of increasing the number of parents willing to submit responses. Training was provided to districts on the new administration method in an effort to equip them with the necessary information skills needed to effectively disseminate the survey and seek response in a way that will maximize response rates. The success of these efforts is evidenced by the increase in response rate from FFY 2023 to FFY 2024 (1.25 percentage point increase). The state believes response rates will continue to increase going forward now that districts are familiar with the process and can see the impact of various response methods.

The state will focus on working more closely with our American Indian populations and teams at the agency to get this survey in the hands of parents. Additionally, the state will work on soliciting feedback from internal and external stakeholders on ways to increase the responses from American Indian populations and families of children with multiple disabilities. The state will connect with parent centers and members of the state advisory panel (SEAP) to determine ways in which the response rate for the survey can be increased, particularly for the aforementioned underrepresented populations.

Describe the analysis of the response rate including any nonresponse bias that was identified, and the steps taken to reduce any identified bias and promote response from a broad cross section of parents of children with disabilities.

Nonresponse bias measures the differences in opinions between respondents and non-respondents in meaningful ways, such as the positivity of responses. A few things can be examined to determine nonresponse bias. One is the overall response rate. The higher the response rate, the less likely nonresponse bias will occur. The state's response rate is 8.66%, which is higher than last year's response rate, but still lower than the state would like, and therefore an area of concern. Note that this year was the second year of a new administration method, and the state believes that a higher response rate will be obtained going forward now that districts are familiar with the process. This can be seen already since the response rate increased from 7.41% to 8.66% from FFY 2023 to FFY 2024. However, given the low response rate, it is possible that those parents who did not respond are different in some meaningful way in their level of positivity from those who did respond. Thus, the state proceeded with the next two ways for examining nonresponse bias.

Second, the representativeness of the responses was examined. Although response rates differed significantly by race/ethnicity, the parent involvement rate did not. However, parent involvement rates were significantly higher among parents of students identified with a speech/language impairment compared to those in other disabilities, and among parents of students in grades K–2 compared to those in grades 9–12+, suggesting the possibility of nonresponse bias.

Third, the state compared the responses of parents who responded early in the process to those who responded later in the process, with the idea being that perhaps those who do not immediately respond are different in some meaningful way than those who respond immediately. These results showed no statistically significant differences between parents who responded earlier and parents who responded later.

Given the low response rate and the significant difference in parent involvement rate by disability, the state concludes that nonresponse bias might be present.

In terms of steps to reduce bias, the state will continue its efforts to support LEAs in effectively disseminating surveys and increasing the numbers of respondents. As noted above, increased response rates are essential for limiting the potential for nonresponse bias. Further, the state will continue assessing the times in which surveys are being submitted to determine if there are any trends or key information that might be relevant to assess whether nonresponse bias might be occurring. If it is determined to possibly be occurring, the state will provide technical assistance and support to LEAs, particularly those most impacted, on effective ways to engage parents in the survey process and increase response rates. Further, the state will work with parent centers and other stakeholders to identify additional strategies that will address the potential nonresponse bias.

Sampling Question	Yes / No
Was sampling used?	NO

Survey Question	Yes / No
Was a survey used?	YES
If yes, is it a new or revised survey?	NO
If yes, provide a copy of the survey.	

Provide additional information about this indicator (optional)

N/A

8 - Prior FFY Required Actions

In the FFY 2024 SPP/APR, the State must report whether the FFY 2024 data are from a response group that is representative of the demographics of children receiving special education services, and, if not, the actions the State is taking to address this issue. The State must also include its analysis of the extent to which the response data are representative of the demographics of children receiving special education services.

Response to actions required in FFY 2023 SPP/APR

Parents of students with disabilities, including preschool students, are given an opportunity to complete the survey. LEAs are responsible for administering the survey to all their parents of students with disabilities ages 3-21. LEAs are provided with the necessary materials to administer the survey either in person (at IEP meetings, parent-teacher conferences, and community functions), via text message, or via email. The materials direct parents to an online portal to respond to the survey. These materials and the processes are the same for parents of students with disabilities in preschool and K-12 programs. The survey that parents of preschool students receive is identical to the survey that parents of K-12 students receive, which creates continuity across all grade bands. The same distribution methods are used for both groups of parents and the same data collation methods are used to aggregate and analyze the results. While the results can be disaggregated between the parents of preschool students and parents of K-12 students, the surveys are not different, and results are automatically combined. These efforts to ensure that responses from parents of preschool and K-12 students are identical in all design, data collection, and data analysis methods and the state is confident these measures are taken in a manner that is valid and reliable.

The State compared the representation by race/ethnicity, primary disability, and grade group in the population to the representation in the respondents using a +/- 3% criteria to identify over-or under-representativeness.

Using this methodology, differences were found by race/ethnicity and primary disability. Two racial/ethnic groups were not representative. Seventy-two percent (72%) of students with disabilities in the state are white, while 80% of the survey respondents were parents of white students with disabilities (+8 percentage points). Thirteen percent (13%) of students with disabilities in the state are American Indian, while 6% of the survey respondents were parents of American Indian students with disabilities (-7 percentage points). All other racial/ethnic groups were within 3 percentage points of their population.

In terms of primary disability groups, there were four disability categories that were not representative. Six percent (6%) of students with disabilities in the state are identified with autism, while nearly 17% of the respondents were parents of students identified with autism (+10 percentage points). Twenty-one percent (21%) of students with disabilities in the state are identified with multiple disabilities, while 8% of the respondents were parents of students identified with multiple disabilities (-13 percentage points). Eleven percent (11%) of students with disabilities in the state are identified with other health impairments, while 7% of the respondents were parents of students identified with other health impairments (-4 percentage points). Seventeen percent (17%) of students with disabilities in the state are identified with a speech/language impairment, while 22% of the respondents were parents of students identified with a speech/language impairment (-5 percentage points). All other primary disability groups were within 3 percentage points of their population.

For more information on how the survey data are combined in a manner that yields valid and reliable data, please see the prompt “Since the State did not report preschool children separately, discuss the procedures used to combine data from school age and preschool surveys in a manner that is valid and reliable.”

For more information on how the state has evaluated and determined the representativeness of respondents, please see the prompt “Include the State’s analyses of the extent to which the demographics of the children for whom parents responded are representative of the demographics of children receiving special education services.”

8 - OSEP Response

8 - Required Actions

In the FFY 2025 SPP/APR, the State must report whether the FFY 2025 data are from a response group that is representative of the demographics of children receiving special education services, and, if not, the actions the State is taking to address this issue. The State must also include its analysis of the extent to which the response data are representative of the demographics of children receiving special education services.

Indicator 9: Disproportionate Representation

Instructions and Measurement

Monitoring Priority: Disproportionality

Compliance indicator: Percent of districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification.

(20 U.S.C. 1416(a)(3)(C))

Data Source

State’s analysis, based on State’s Child Count data collected under IDEA section 618, to determine if the disproportionate representation of racial and ethnic groups in special education and related services was the result of inappropriate identification.

Measurement

Percent = [(# of districts, that meet the State-established n and/or cell size (if applicable) for one or more racial/ethnic groups, with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification) divided by the (# of districts in the State that meet the State-established n and/or cell size (if applicable) for one or more racial/ethnic groups)] times 100.

Include State’s definition of “disproportionate representation”. Please specify in your definition: 1) the calculation method(s) being used (i.e., risk ratio, weighted risk ratio, e-formula, etc.); and 2) the threshold at which disproportionate representation is identified. Also include, as appropriate, 3) the number of years of data used in the calculation; and 4) any minimum cell and/or n-sizes (i.e., risk numerator and/or risk denominator).

Based on its review of the 618 data for the reporting year, describe how the State made its annual determination as to whether the disproportionate representation it identified of racial and ethnic groups in special education and related services was the result of inappropriate identification as required by 34 CFR §§300.600(d)(3) and 300.602(a), e.g., using monitoring data; reviewing policies, practices and procedures. In determining disproportionate representation, analyze data, for each district, for all racial and ethnic groups in the district, or all racial and ethnic groups in the district that meet a minimum n and/or cell size set by the State. Report on the percent of districts in which disproportionate representation of racial and ethnic groups in special education and related services is the result of inappropriate identification, even if the determination of inappropriate identification was made after the end of the FFY 2024 reporting period (i.e., after June 30, 2025).

Instructions

Provide racial/ethnic disproportionality data for all children aged 5 who are enrolled in kindergarten and aged 6 through 21 served under IDEA, aggregated across all disability categories. Provide the actual numbers used in the calculation.

States are not required to report on underrepresentation.

If the State has established a minimum n and/or cell size requirement, the State may only include, in both the numerator and the denominator, districts that met that State-established n and/or cell size. If the State used a minimum n and/or cell size requirement, report the number of districts totally excluded from the calculation as a result of this requirement because the district did not meet the minimum n and/or cell size for any racial/ethnic group.

Consider using multiple methods in calculating disproportionate representation of racial and ethnic groups to reduce the risk of overlooking potential problems. Describe the method(s) used to calculate disproportionate representation.

Provide the number of districts that met the State-established n and/or cell size (if applicable) for one or more racial/ethnic groups identified with disproportionate representation of racial and ethnic groups in special education and related services and the number of those districts identified with disproportionate representation that is the result of inappropriate identification.

Targets must be 0%.

Provide detailed information about the timely correction of child-specific and regulatory/systemic noncompliance as noted in OSEP’s response for the previous SPP/APR. If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, improvement activities completed (e.g., review of policies and procedures, technical assistance, training) and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2024 SPP/APR, the data for FFY 2023), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

If the State did not issue any findings because it has adopted procedures that permit its LEAs to correct noncompliance prior to the State’s issuance of a finding (i.e., pre-finding correction), the explanation within each applicable indicator must include how the State verified, prior to issuing a finding, that the LEA has corrected each individual case of child-specific noncompliance and is correctly implementing the specific regulatory requirements.

9 - Indicator Data

Not Applicable

Select yes if this indicator is not applicable.

NO

Historical Data

Baseline Year	Baseline Data
2024	0.00%

FFY	2019	2020	2021	2022	2023
Target	0%	0%	0%	0%	0%
Data	0.00%	0.00%	0.00%	0.00%	0.00%

Targets

FFY	2024	2025
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Target	0%	0%
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FFY 2024 SPP/APR Data

Has the state established a minimum n and/or cell size requirement? (yes/no)

YES

If yes, the State may only include, in both the numerator and the denominator, districts that met the State-established n and/or cell size. Report the number of districts excluded from the calculation as a result of the requirement.

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Number of districts with disproportionate representation of racial/ethnic groups in special education and related services	Number of districts with disproportionate representation of racial/ethnic groups in special education and related services that is the result of inappropriate identification	Number of districts that met the State's minimum n and/or cell size	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
2	0	228	0.00%	0%	0.00%	N/A	N/A

Were all races and ethnicities included in the review?

YES

Define "disproportionate representation." Please specify in your definition: 1) the calculation method(s) being used (i.e., risk ratio, weighted risk ratio, e-formula, etc.); and 2) the threshold at which disproportionate representation is identified. Also include, as appropriate, 3) the number of years of data used in the calculation; and 4) any minimum cell and/or n-sizes (i.e., risk numerator and/or risk denominator).

Number of years of data used = One year

Minimum cell size = 10 students with disabilities in a particular racial/ethnic group (applies to both the target and comparison groups)

Minimum n-size = 30 students enrolled in a particular racial/ethnic group (applies to both the target and comparison groups)

Methodology = The calculation methodology used by the SEA is a risk ratio analysis to compare the risk of a racial/ethnic group receiving special education and related services to all other racial/ethnic groups experiencing that same outcome. Those LEAs failing to meet minimum cell and/or n-size requirements for either the target group (students with disabilities in racial/ethnic group) or the comparison group (students with disabilities in all other racial/ethnic groups) will be excluded from analysis to mitigate volatility of data in smaller populations. The LEAs meeting established minimum cell and n-size requirements for one or more racial/ethnic group will have risk ratios calculated.

To prepare for calculating risk ratios, the SEA first determines the risk of the target group, or the racial/ethnic group receiving special education and related services. This target group risk is calculated by dividing the number of students with disabilities in a particular racial/ethnic group by the number of students enrolled in that same racial/ethnic group. Next, the SEA calculates the risk of the comparison group. This is calculated by dividing the number of students with disabilities in all other racial/ethnic groups not in the target group by the number of students enrolled in all other racial/ethnic groups.

To determine risk ratios, the risk of the target racial/ethnic group is divided by the risk of the comparison racial/ethnic groups. The resulting risk ratio is used to determine disproportionate representation. Alternate risk ratios are not calculated for Indicator 9.

Threshold = The disproportionate representation threshold is a risk ratio of 3.00 or greater.

FFY 2024 summary = In the FFY 2024 reporting period, two LEAs met minimum cell and n-size requirements and exceeded the risk ratio threshold of 3.00. Both LEAs were evaluated by the SEA to determine whether disproportionate representation for a racial/ethnic group was the result of inappropriate identification.

Describe how the State made its annual determination as to whether the disproportionate representation it identified of racial and ethnic groups in special education and related services was the result of inappropriate identification.

For the two LEAs meeting criteria for disproportionate representation, the state reviewed the policies and procedures of that LEA, results of on-site compliance monitoring, and dispute resolution data to determine if the disproportionate representation was due to inappropriate identification.

The reviews for the two LEAs included:

- Review of the most current Program Narratives and Policies;
- Review of special education records (Evaluation Reports (ERs) and Individualized Education Programs (IEPs));
- Review of Child Count information; and
- Consideration of the most current Monitoring Data

Based on the state's review of the two LEAs, the state determined that none of them had disproportionate representation for identified racial/ethnic groups receiving special education and related services that was the result of inappropriate identification.

Provide additional information about this indicator (optional)

In FFY 2024, based on stakeholder input and feedback, the state redesigned the Indicator 9 methodology used for determining disproportionate representation. This included revising the minimum cell and n-size requirements and changing the methodology to use risk ratios for disproportionate representation. As such, this constitutes a change to methodology and the data for FFY 2024 are no longer comparable to the data from prior years. For this reason, the state reset the Indicator 9 baseline.

Correction of Findings of Noncompliance Identified in FFY 2023

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
0	0	0	0

If procedures have been adopted that permit LEAs to correct noncompliance prior to the State's issuance of a finding (i.e., pre-finding correction), describe how, for instances of noncompliance discovered in FFY 2023, the State verified: (1) that the source of noncompliance is correctly implementing the regulatory requirements; and, (2) each individual case of noncompliance was corrected.

N/A

Correction of Findings of Noncompliance Identified Prior to FFY 2023

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2023 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

9 - Prior FFY Required Actions

None

9 - OSEP Response

The State has revised the baseline for this indicator, using data from FFY 2024, and OSEP accepts that revision.

9 - Required Actions

Indicator 10: Disproportionate Representation in Specific Disability Categories

Instructions and Measurement

Monitoring Priority: Disproportionality

Compliance indicator: Percent of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification.
(20 U.S.C. 1416(a)(3)(C))

Data Source

State’s analysis, based on State’s Child Count data collected under IDEA section 618, to determine if the disproportionate representation of racial and ethnic groups in specific disability categories was the result of inappropriate identification.

Measurement

Percent = [(# of districts, that meet the State-established n and/or cell size (if applicable) for one or more racial/ethnic groups, with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification) divided by the (# of districts in the State that meet the State-established n and/or cell size (if applicable) for one or more racial/ethnic groups)] times 100.

Include State’s definition of “disproportionate representation”. Please specify in your definition: 1) the calculation method(s) being used (i.e., risk ratio, weighted risk ratio, e-formula, etc.); and 2) the threshold at which disproportionate representation is identified. Also include, as appropriate, 3) the number of years of data used in the calculation; and 4) any minimum cell and/or n-sizes (i.e., risk numerator and/or risk denominator).

Based on its review of the section 618 data for the reporting year, describe how the State made its annual determination as to whether the disproportionate representation it identified of racial and ethnic groups in specific disability categories was the result of inappropriate identification as required by 34 CFR §§300.600(d)(3) and 300.602(a), (e.g., using monitoring data; reviewing policies, practices and procedures). In determining disproportionate representation, analyze data, for each district, for all racial and ethnic groups in the district, or all racial and ethnic groups in the district that meet a minimum n and/or cell size set by the State. Report on the percent of districts in which disproportionate representation of racial and ethnic groups in specific disability categories is the result of inappropriate identification, even if the determination of inappropriate identification was made after the end of the FFY 2024 reporting period (i.e., after June 30, 2025).

Instructions

Provide racial/ethnic disproportionality data for all children aged 5 who are enrolled in kindergarten and aged 6 through 21 served under IDEA. Provide these data at a minimum for children in the following six disability categories: intellectual disability, specific learning disabilities, emotional disturbance, speech or language impairments, other health impairments, and autism. If a State has identified disproportionate representation of racial and ethnic groups in specific disability categories other than these six disability categories, the State must include these data and report on whether the State determined that the disproportionate representation of racial and ethnic groups in specific disability categories was the result of inappropriate identification. Provide the actual numbers used in the calculation.

States are not required to report on underrepresentation.

If the State has established a minimum n and/or cell size requirement, the State may only include, in both the numerator and the denominator, districts that met that State-established n and/or cell size. If the State used a minimum n and/or cell size requirement, report the number of districts totally excluded from the calculation as a result of this requirement because the district did not meet the minimum n and/or cell size for any racial/ethnic group.

Consider using multiple methods in calculating disproportionate representation of racial and ethnic groups to reduce the risk of overlooking potential problems. Describe the method(s) used to calculate disproportionate representation.

Provide the number of districts that met the State-established n and/or cell size (if applicable) for one or more racial/ethnic groups identified with disproportionate representation of racial and ethnic groups in specific disability categories and the number of those districts identified with disproportionate representation that is the result of inappropriate identification.

Targets must be 0%.

Provide detailed information about the timely correction of child-specific and regulatory/systemic noncompliance as noted in OSEP’s response for the previous SPP/APR. If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, improvement activities completed (e.g., review of policies and procedures, technical assistance, training) and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2024 SPP/APR, the data for FFY 2023), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

If the State did not issue any findings because it has adopted procedures that permit its LEAs to correct noncompliance prior to the State’s issuance of a finding (i.e., pre-finding correction), the explanation within each applicable indicator must include how the State verified, prior to issuing a finding, that the LEA has corrected each individual case of child-specific noncompliance and is correctly implementing the specific regulatory requirements.

10 - Indicator Data

Not Applicable

Select yes if this indicator is not applicable.

NO

Historical Data

Baseline Year	Baseline Data
2024	0.00%

FFY	2019	2020	2021	2022	2023
Target	0%	0%	0%	0%	0%
Data	0.00%	0.00%	0.00%	0.00%	0.00%

Targets

FFY	2024	2025
Target	0%	0%

FFY 2024 SPP/APR Data

Has the state established a minimum n and/or cell size requirement? (yes/no)

YES

If yes, the State may only include, in both the numerator and the denominator, districts that met the State-established n and/or cell size. Report the number of districts excluded from the calculation as a result of the requirement.

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Number of districts with disproportionate representation of racial/ethnic groups in specific disability categories	Number of districts with disproportionate representation of racial/ethnic groups in specific disability categories that is the result of inappropriate identification	Number of districts that met the State's minimum n and/or cell size	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
2	0	137	0.00%	0%	0.00%	N/A	N/A

Were all races and ethnicities included in the review?

YES

Define "disproportionate representation". Please specify in your definition: 1) the calculation method(s) being used (i.e., risk ratio, weighted risk ratio, e-formula, etc.); and 2) the threshold at which disproportionate representation is identified. Also include, as appropriate, 3) the number of years of data used in the calculation; and 4) any minimum cell and/or n-sizes (i.e., risk numerator and/or risk denominator).

Number of years of data used = One year

Minimum cell size = 10 students with disabilities in a particular racial/ethnic group and disability category (applies to both the target and comparison groups)

Minimum n-size = 30 students enrolled in a particular racial/ethnic group and disability category (applies to both the target and comparison groups)

Methodology = The calculation methodology used by the SEA is a risk ratio analysis to compare the risk of a racial/ethnic group identified with a specific disability to all other racial/ethnic groups experiencing that same outcome. Those LEAs failing to meet minimum cell and/or n-size requirements for either the target group (students with disabilities in racial/ethnic group for a specific disability category) or the comparison group (students with disabilities in all other racial/ethnic groups in a specific disability category) will be excluded from analysis to mitigate volatility of data in smaller populations. The LEAs meeting established minimum cell and n-size requirements for one or more racial/ethnic group and specific disability category will have risk ratios calculated.

To prepare for calculating risk ratios, the SEA first determines the risk of the target group, or the racial/ethnic group in a specific disability category. This target group risk is calculated by dividing the number of students with disabilities in a particular racial/ethnic group for a specific disability category by the number of students enrolled in that same racial/ethnic group. Next, the SEA calculates the risk of the comparison group. This is calculated by dividing the number of students with disabilities in all other racial/ethnic groups not in the target group in a specific disability category by the number of students enrolled in all other racial/ethnic groups.

To determine risk ratios, the risk of the target racial/ethnic group in a specific disability category is divided by the risk of the comparison racial/ethnic groups in a specific disability category. The resulting risk ratio is used to determine disproportionate representation. Alternate risk ratios are not calculated for Indicator 10.

Threshold = The disproportionate representation threshold is a risk ratio of 3.00 or greater.

FFY 2024 summary = In the FFY 2024 reporting period, two LEAs met minimum cell and n-size requirements and exceeded the risk ratio threshold of 3.00. Both LEAs were evaluated by the SEA to determine whether disproportionate representation for a racial/ethnic group was the result of inappropriate identification.

Describe how the State made its annual determination as to whether the disproportionate overrepresentation it identified of racial and ethnic groups in specific disability categories was the result of inappropriate identification.

For the two LEAs meeting criteria for disproportionate representation, the state reviewed the policies and procedures of that LEA, results of on-site compliance monitoring, and dispute resolution data to determine if the disproportionate representation was due to inappropriate identification.

- The reviews for the two LEAs included:
- Review of the most current Program Narratives and Policies;
 - Review of special education records (Evaluation Reports (ERs) and Individualized Education Programs (IEPs));
 - Review of Child Count information; and
 - Consideration of the most current Monitoring Data

Based on the state's review of the two LEAs, the state determined that none of them had disproportionate representation for identified racial/ethnic groups receiving special education and related services that was the result of inappropriate identification.

Provide additional information about this indicator (optional)

In FFY 2024, based on stakeholder input and feedback, the state redesigned the Indicator 10 methodology used for determining disproportionate representation. This included revising the minimum cell and n-size requirements and changing the methodology to use risk ratios for disproportionate representation. As such, this constitutes a change to methodology and the data for FFY 2024 are no longer comparable to the data from prior years. For this reason, the state reset the Indicator 10 baseline.

Correction of Findings of Noncompliance Identified in FFY 2023

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
0	0	0	0

If procedures have been adopted that permit LEAs to correct noncompliance prior to the State's issuance of a finding (i.e., pre-finding correction), describe how, for instances of noncompliance discovered in FFY 2023, the State verified: (1) that the source of noncompliance is correctly implementing the regulatory requirements; and, (2) each individual case of noncompliance was corrected.

N/A

Correction of Findings of Noncompliance Identified Prior to FFY 2023

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2023 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

10 - Prior FFY Required Actions

None

10 - OSEP Response

The State has revised the baseline for this indicator, using data from FFY 2024, and OSEP accepts that revision.

10 - Required Actions

Indicator 11: Child Find

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part B / Child Find

Compliance indicator: Percent of children who were evaluated within 60 days of receiving parental consent for initial evaluation or, if the State establishes a timeframe within which the evaluation must be conducted, within that timeframe.

(20 U.S.C. 1416(a)(3)(B))

Data Source

Data to be taken from State monitoring or State data system and must be based on actual, not an average, number of days. Indicate if the State has established a timeline and, if so, what is the State's timeline for initial evaluations.

Measurement

a. # of children for whom parental consent to evaluate was received.

b. # of children whose evaluations were completed within 60 days (or State-established timeline).

Account for children included in (a), but not included in (b). Indicate the range of days beyond the timeline when the evaluation was completed and any reasons for the delays.

Percent = [(b) divided by (a)] times 100.

Instructions

If data are from State monitoring, describe the method used to select LEAs for monitoring. If data are from a State database, include data for the entire reporting year.

Describe the results of the calculations and compare the results to the target. Describe the method used to collect these data, and if data are from the State's monitoring, describe the procedures used to collect these data. Provide the actual numbers used in the calculation.

Note that under 34 CFR §300.301(d), the timeframe set for initial evaluation does not apply to a public agency if: (1) the parent of a child repeatedly fails or refuses to produce the child for the evaluation; or (2) a child enrolls in a school of another public agency after the timeframe for initial evaluations has begun, and prior to a determination by the child's previous public agency as to whether the child is a child with a disability. States should not report these exceptions in either the numerator (b) or denominator (a). If the State-established timeframe provides for exceptions through State regulation or policy, describe cases falling within those exceptions and include in b.

Targets must be 100%.

Provide detailed information about the timely correction of child-specific and regulatory/systemic noncompliance as noted in OSEP's response for the previous SPP/APR. If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, improvement activities completed (e.g., review of policies and procedures, technical assistance, training) and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2024 SPP/APR, the data for FFY 2023), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

If the State did not issue any findings because it has adopted procedures that permit its LEAs to correct noncompliance prior to the State's issuance of a finding (i.e., pre-finding correction), the explanation within each applicable indicator must include how the State verified, prior to issuing a finding, that the LEA has corrected each individual case of child-specific noncompliance and is correctly implementing the specific regulatory requirements.

11 - Indicator Data

Historical Data

Baseline Year	Baseline Data
2005	93.00%

FFY	2019	2020	2021	2022	2023
Target	100%	100%	100%	100%	100%
Data	100.00%	95.93%	Not Valid and Reliable	100.00%	100.00%

Targets

FFY	2024	2025
Target	100%	100%

FFY 2024 SPP/APR Data

(a) Number of children for whom parental consent to evaluate was received	(b) Number of children whose evaluations were completed within 60 days (or State-established timeline)	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
35	35	100.00%	100%	100.00%	Met target	No Slippage

Number of children included in (a) but not included in (b)

0

Account for children included in (a) but not included in (b). Indicate the range of days beyond the timeline when the evaluation was completed and any reasons for the delays.

Indicate the evaluation timeline used:

The State used the 60 day timeframe within which the evaluation must be conducted

What is the source of the data provided for this indicator?

State monitoring

Describe the method used to collect these data, and if data are from the State's monitoring, describe the procedures used to collect these data.

The SEA collected the indicator data as a part of its compliance monitoring procedures during the 2024-25 school year. Compliance monitors reviewed a sampling of student records for students who were initially referred for a special education evaluation. Monitors enter the date consent was received, the date of the last assessment completed for the evaluation, and the date of the Evaluation Report meeting into the SEA Monitoring application. The system calculates the number of calendar days between the date consent was received and the date the last assessment was completed. If more than 60 calendar days passed, the monitor is prompted to enter the reason.

Provide additional information about this indicator (optional)

N/A

Correction of Findings of Noncompliance Identified in FFY 2023

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
0	0	0	0

If procedures have been adopted that permit LEAs to correct noncompliance prior to the State's issuance of a finding (i.e., pre-finding correction), describe how, for instances of noncompliance discovered in FFY 2023, the State verified: (1) that the source of noncompliance is correctly implementing the regulatory requirements; and, (2) each individual case of noncompliance was corrected.

N/A

Correction of Findings of Noncompliance Identified Prior to FFY 2023

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2023 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

11 - Prior FFY Required Actions

None

11 - OSEP Response

11 - Required Actions

Indicator 12: Early Childhood Transition

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part B / Effective Transition

Compliance indicator: Percent of children referred by Part C prior to age 3, who are found eligible for Part B, and who have an IEP developed and implemented by their third birthdays.

(20 U.S.C. 1416(a)(3)(B))

Data Source

Data to be taken from State monitoring or State data system.

Measurement

- a. # of children who have been served in Part C and referred to Part B for Part B eligibility determination.
- b. # of those referred determined to be NOT eligible and whose eligibility was determined prior to their third birthdays.
- c. # of those found eligible who have an IEP developed and implemented by their third birthdays.
- d. # of children for whom parent refusal to provide consent caused delays in evaluation or initial services or to whom exceptions under 34 CFR §300.301(d) applied.
- e. # of children determined to be eligible for early intervention services under Part C less than 90 days before their third birthdays.
- f. # of children whose parents chose to continue early intervention services beyond the child's third birthday through a State's policy under 34 CFR §303.211 or a similar State option.

Account for children included in (a), but not included in b, c, d, e, or f. Indicate the range of days beyond the third birthday when eligibility was determined and the IEP developed, and the reasons for the delays.

Percent = [(c) divided by (a - b - d - e - f)] times 100.

Instructions

If data are from State monitoring, describe the method used to select LEAs for monitoring. If data are from a State database, include data for the entire reporting year.

Describe the results of the calculations and compare the results to the target. Describe the method used to collect these data and if data are from the State's monitoring, describe the procedures used to collect these data. Provide the actual numbers used in the calculation.

Targets must be 100%.

Category f is to be used only by States that have an approved policy for providing parents the option of continuing early intervention services beyond the child's third birthday under 34 CFR §303.211 or a similar State option.

Provide detailed information about the timely correction of child-specific and regulatory/systemic noncompliance as noted in OSEP's response for the previous SPP/APR. If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, improvement activities completed (e.g., review of policies and procedures, technical assistance, training) and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2024 SPP/APR, the data for FFY 2023), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

If the State did not issue any findings because it has adopted procedures that permit its LEAs to correct noncompliance prior to the State's issuance of a finding (i.e., pre-finding correction), the explanation within each applicable indicator must include how the State verified, prior to issuing a finding, that the LEA has corrected each individual case of child-specific noncompliance and is correctly implementing the specific regulatory requirements.

12 - Indicator Data

Not Applicable

Select yes if this indicator is not applicable.

NO

Historical Data

Baseline Year	Baseline Data
2005	67.00%

FFY	2019	2020	2021	2022	2023
Target	100%	100%	100%	100%	100%
Data	97.62%	93.94%	89.09%	94.12%	70.06%

Targets

FFY	2024	2025
Target	100%	100%

FFY 2024 SPP/APR Data

a. Number of children who have been served in Part C and referred to Part B for Part B eligibility determination.	161
b. Number of those referred determined to be NOT eligible and whose eligibility was determined prior to third birthday.	16
c. Number of those found eligible who have an IEP developed and implemented by their third birthdays.	59
d. Number for whom parent refusals to provide consent caused delays in evaluation or initial services or to whom exceptions under 34 CFR §300.301(d) applied.	6
e. Number of children who were referred to Part C less than 90 days before their third birthdays.	30
f. Number of children whose parents chose to continue early intervention services beyond the child's third birthday through a State's policy under 34 CFR §303.211 or a similar State option.	3

Measure	Numerator (c)	Denominator (a-b-d-e-f)	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
Percent of children referred by Part C prior to age 3 who are found eligible for Part B, and who have an IEP developed and implemented by their third birthdays.	59	106	70.06%	100%	55.66%	Did not meet target	Slippage

Provide reasons for slippage, if applicable

From FFY 2023 to FFY 2024, the Indicator 12 percentage decreased by 14.50 percentage points. The state has identified several likely reasons for this slippage. First, LEAs across the state have reported pervasive staffing shortages/challenges and high staff turnover that have resulted in delays in processing referrals and ensuring that evaluations were complete, and if eligible, IEP meetings were held with IEPs ready to be implemented by a child's third birthday. LEAs reported that over 19% of delays were due to LEA scheduling issues or internal challenges, including staffing shortages or staff availability. Additionally, LEAs reported challenges with parent communications and scheduling that also contributed to increased noncompliance and thus the observed slippage for FFY 2024. LEAs reported that over 21 percent of the delays were due to challenges with parent communication or parent scheduling delays. Finally, over 6% were due to delays in referrals from Part C to Part B. Much like with LEAs, there continues to be staffing shortages and challenges in early intervention programs that likely contributed to delays in communications from Part C to Part B.

In addition, four of the largest LEAs in the state (in top 20 in terms of student population) impacted statewide data due to the large percentage of their students represented in the FFY 2023 Indicator 12 data set. These large LEAs have been substantially affected by staffing shortages and staff turnover, thus contributing to the overall noncompliance reported by the state. The Indicator 12 compliance percentage for these for LEAs decreased an average of 44 percentage points from FFY 2023 to FFY 2024, indicating their impact on the overall statewide slippage. Further, these four large LEAs accounted for over 30% of the total Indicator 12 records and accounted for over 36% of the noncompliant records reported for Indicator 12. As such, the decrease in compliance for these four large LEAs affected the overall state data and contributed to the slippage.

Number of children who served in Part C and referred to Part B for eligibility determination that are not included in b, c, d, e, or f

47

Account for children included in (a), but not included in b, c, d, e, or f. Indicate the range of days beyond the third birthday when eligibility was determined and the IEP developed, and the reasons for the delays.

In FFY 2024, there were 47 records that were determined noncompliant.

For records in which children were determined not eligible after their third birthdays, the range of days beyond the third birthday was 2 to 142. For records in which children were determined eligible, 19 children had their eligibility completed by their third birthday and for the remaining records, the range of days beyond their third birthday was 1 to 178. These eligible children had IEPs implemented after their third birthdays, with the range of days beyond the third birthday being 1 to 135.

Reasons for delay included late referrals from Part C to the LEA, parent-related delays (e.g., scheduling), and LEA-related delays (e.g., scheduling, staffing shortages and challenges).

Attach PDF table (optional)

What is the source of the data provided for this indicator?

State database that includes data for the entire reporting year

Describe the method used to collect these data, and if data are from the State's monitoring, describe the procedures used to collect these data.

The SEA uses a census-level data collection for this indicator. The Part C Lead Agency submits data through a secure data file transfer system, regarding all children referred to a school district to the SEA. The SEA collates this data and verifies the referral through the statewide student information system (SIS). This SIS contains documentation of the referral, the eligibility determination and, if the child is eligible, the student's IEP. This allows the SEA to determine district compliance with the Part C to Part B transition requirements. By using this method, the SEA can account for all children in the state who transition from Part C to Part B.

Provide additional information about this indicator (optional)

N/A

Correction of Findings of Noncompliance Identified in FFY 2023

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
22	22	0	0

FFY 2023 Findings of Noncompliance Verified as Corrected

Describe how the State verified that the source of noncompliance is correctly implementing the *regulatory requirements*

In FFY 2023, there were 22 LEAs that were the source of noncompliance for the 47 individual records with noncompliance. The state issued written findings and required the 22 LEAs to complete a corrective action plan (CAP) that required the LEAs to drill down into and take steps to correct the root cause of the noncompliance to prevent it from recurring. After completion of the CAP and correction of the child-specific noncompliance, the state conducted a subsequent data review of new student records to evaluate compliance with regulatory requirements. Through these activities, the state verified that the 22 LEAs that were the source of noncompliance are now correctly implementing the regulatory requirements with 100% compliance, consistent with QA 23-01.

Describe how the State verified that each *individual case* of noncompliance was corrected

The 47 individual cases of noncompliance reported in FFY 2023 were required to be corrected, albeit past the child's third birthday, to ensure an eligibility determination was made and, when eligible, an IEP was developed and implemented. LEAs with the 47 cases of noncompliance were required to submit evidence of such actions and the state verified that each of the 47 individual cases of noncompliance were corrected, consistent with QA 23-01.

If procedures have been adopted that permit LEAs to correct noncompliance prior to the State's issuance of a finding (i.e., pre-finding correction), describe how, for instances of noncompliance discovered in FFY 2023, the State verified: (1) that the source of noncompliance is correctly implementing the regulatory requirements; and, (2) each individual case of noncompliance was corrected.

N/A

Correction of Findings of Noncompliance Identified Prior to FFY 2023

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2023 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

12 - Prior FFY Required Actions

Because the State reported less than 100% compliance for FFY 2023, the State must report on the status of correction of noncompliance identified in FFY 2023 for this indicator. When reporting on the correction of noncompliance, the State must report, in the FFY 2024 SPP/APR, that it has verified that each LEA with findings of noncompliance identified in FFY 2023: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the LEA, consistent with OSEP QA 23-01. In the FFY 2024 SPP/APR, the State must describe the specific actions that were taken to verify the correction. If the State did not identify any findings of noncompliance in FFY 2023, although its FFY 2023 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings of noncompliance in FFY 2023. If the State did not issue any findings because it has adopted procedures that permit its LEAs to correct noncompliance prior to the State's issuance of a finding, the explanation must include how the State verified, prior to issuing a finding, that the LEA has corrected each individual case of child-specific noncompliance and is correctly implementing the specific regulatory requirements.

Response to actions required in FFY 2023 SPP/APR

For information on the correction of findings of noncompliance for FFY 2023, please see the section titled "Correction of Findings of Noncompliance Identified in FFY 2023."

12 - OSEP Response

12 - Required Actions

Because the State reported less than 100% compliance for FFY 2024, the State must report on the status of correction of noncompliance identified in FFY 2024 for this indicator. When reporting on the correction of noncompliance, the State must report, in the FFY 2025 SPP/APR, that it has verified that each LEA with noncompliance identified in FFY 2024 for this indicator: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the LEA and no outstanding corrective action exists under a State complaint or due process hearing decision for the child, consistent with OSEP QA 23-01. In the FFY 2025 SPP/APR, the State must describe the specific actions that were taken to verify the correction. If the State did not identify any findings of noncompliance in FFY 2024, although its FFY 2024 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings. If the State did not issue any findings because it has adopted procedures that permit its LEAs to correct noncompliance prior to the State's issuance of a finding, the explanation must include how the State verified, prior to issuing a finding, that the LEA has corrected each individual case of child-specific noncompliance and is correctly implementing the specific regulatory requirements.

Indicator 13: Secondary Transition

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part B / Effective Transition

Compliance indicator: Percent of youth with IEPs aged 16 and above with an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon an age appropriate transition assessment, transition services including courses of study that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student's transition services needs. There also must be evidence that the student was invited to the IEP Team meeting where transition services are to be discussed and evidence that, if appropriate, a representative of any participating agency that is likely to be responsible for providing or paying for transition services, including, if appropriate, pre-employment transition services, was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority.

(20 U.S.C. 1416(a)(3)(B))

Data Source

Data to be taken from State monitoring or State data system.

Measurement

Percent = [(# of youth with IEPs aged 16 and above with an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon an age appropriate transition assessment, transition services including courses of study that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student's transition services needs. There also must be evidence that the student was invited to the IEP Team meeting where transition services are to be discussed and evidence that, if appropriate, a representative of any participating agency that is likely to be responsible for providing or paying for transition services, including, if appropriate, pre-employment transition services, was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority) divided by the (# of youth with an IEP age 16 and above)] times 100.

If a State's policies and procedures provide that public agencies must meet these requirements at an age younger than 16, the State may, but is not required to, choose to include youth beginning at that younger age in its data for this indicator. If a State chooses to do this, it must state this clearly in its SPP/APR and ensure that its baseline data are based on youth beginning at that younger age.

Instructions

If data are from State monitoring, describe the method used to select LEAs for monitoring. If data are from a State database, include data for the entire reporting year.

Describe the results of the calculations and compare the results to the target. Describe the method used to collect these data and if data are from the State's monitoring, describe the procedures used to collect these data. Provide the actual numbers used in the calculation.

Targets must be 100%.

Provide detailed information about the timely correction of child-specific and regulatory/systemic noncompliance as noted in OSEP's response for the previous SPP/APR. If the State did not ensure timely correction of the previous noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance, improvement activities completed (e.g., review of policies and procedures, technical assistance, training) and any enforcement actions that were taken.

If the State reported less than 100% compliance for the previous reporting period (e.g., for the FFY 2024 SPP/APR, the data for FFY 2023), and the State did not identify any findings of noncompliance, provide an explanation of why the State did not identify any findings of noncompliance.

If the State did not issue any findings because it has adopted procedures that permit its LEAs to correct noncompliance prior to the State's issuance of a finding (i.e., pre-finding correction), the explanation within each applicable indicator must include how the State verified, prior to issuing a finding, that the LEA has corrected each individual case of child-specific noncompliance and is correctly implementing the specific regulatory requirements.

13 - Indicator Data

Historical Data

Baseline Year	Baseline Data
2009	85.30%

FFY	2019	2020	2021	2022	2023
Target	100%	100%	100%	100%	100%
Data	73.53%	72.37%	48.98%	82.61%	54.24%

Targets

FFY	2024	2025
Target	100%	100%

FFY 2024 SPP/APR Data

Number of youth aged 16 and above with IEPs that contain each of the required components for secondary transition	Number of youth with IEPs aged 16 and above	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
24	49	54.24%	100%	48.98%	Did not meet target	Slippage

Provide reasons for slippage, if applicable

From FFY 2023 to FFY 2024, the compliance percentage for Indicator 13 decreased by 5.26 percentage points. Through data analysis of the FFY 2024 monitoring results, the state has determined potential reasons for the slippage. By virtue of selecting records from LEAs in the cyclical monitoring process for a reporting period, data can be prone to fluctuation as the comparison groups are not exactly analogous from year to year (i.e., different LEAs are reviewed each year over a five-year period). For this reason, the state has not been immune to substantial compliance rates from one year to the next. This can be observed through the changes in compliance rates from the FFY 2021 submission to FFY 2024.

When analyzing the data for FFY 2024, the state observed that three LEAs in the monitoring cycle were larger in terms of student population (all three are among the 75 largest LEAs in the state out of a population of 398 LEAs). Given the small student population of Montana, large LEAs tend to have a more notable impact on data sets for the state. These three LEAs comprised nearly 45% of the total records reviewed by the state in FFY 2024 and accounted for 44% of the noncompliant records in the state. Accordingly, the noncompliance for these three LEAs had a substantial impact on the statewide noncompliance. These larger LEAs, like most agencies across the state, are experiencing staffing challenges and high turnover. Even small LEAs included in the monitoring cohort are experiencing broad staffing shortages, particularly in specialized positions, which limits the quality, efficacy, and implementation of things like transition plans.

What is the source of the data provided for this indicator?

State monitoring

Describe the method used to collect these data, and if data are from the State's monitoring, describe the procedures used to collect these data.

The SEA collected the indicator data as a part of its compliance monitoring procedures during the 2024-25 school year. Compliance monitors reviewed a sampling of student records for students, ages 16 and older (consistent with the process for file selection outlined in the introduction), to ensure their IEPs include appropriate measurable postsecondary goals that are annually updated and based upon an age-appropriate transition assessments, transition services, including courses of study, that will reasonably enable the student to meet their postsecondary goals, and annual IEP goals related to the student's transition service needs. There also must be evidence that the student was invited to the IEP team meeting where transition services were to be discussed and evidence that, if appropriate, a representative of any participating agency that is likely to be responsible for providing or paying for transition services, including, if appropriate, pre-employment transition services, was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority.

Question	Yes / No
Do the State's policies and procedures provide that public agencies must meet these requirements at an age younger than 16?	NO

Provide additional information about this indicator (optional)

Correction of Findings of Noncompliance Identified in FFY 2023

Findings of Noncompliance Identified	Findings of Noncompliance Verified as Corrected Within One Year	Findings of Noncompliance Subsequently Corrected	Findings Not Yet Verified as Corrected
7	7	0	0

FFY 2023 Findings of Noncompliance Verified as Corrected

Describe how the State verified that the source of noncompliance is correctly implementing the regulatory requirements

In FFY 2023, there were 7 LEAs that were the source of noncompliance for the 27 individual records with noncompliance. The state issued written findings and required the 7 LEAs to complete a corrective action plan (CAP) that required the LEAs to drill down into and take steps to correct the root cause of the noncompliance in order to prevent it from recurring. After completion of the CAP and correction of the child-specific noncompliance, the state conducted a subsequent data review of new student records to evaluate compliance with regulatory requirements. Through these activities, the state verified that the 7 LEAs that were the source of noncompliance are now correctly implementing the regulatory requirements with 100% compliance, consistent with QA 23-01.

Describe how the State verified that each individual case of noncompliance was corrected

The 27 individual cases of noncompliance reported in FFY 2023 were required to be corrected to ensure that a robust, compliant transition plan capturing all required components was in place. LEAs with the 27 cases of noncompliance were required to submit evidence of the corrected transition plans and the state verified that each of the 27 individual cases of noncompliance were corrected, consistent with QA 23-01.

If procedures have been adopted that permit LEAs to correct noncompliance prior to the State's issuance of a finding (i.e., pre-finding correction), describe how, for instances of noncompliance discovered in FFY 2023, the State verified: (1) that the source of noncompliance is correctly implementing the regulatory requirements; and, (2) each individual case of noncompliance was corrected.

N/A

Correction of Findings of Noncompliance Identified Prior to FFY 2023

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2023 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

13 - Prior FFY Required Actions

Because the State reported less than 100% compliance for FFY 2023, the State must report on the status of correction of noncompliance identified in FFY 2023 for this indicator. When reporting on the correction of noncompliance, the State must report, in the FFY 2024 SPP/APR, that it has verified that each LEA with findings of noncompliance identified in FFY 2023: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the LEA, consistent with OSEP QA 23-01. In the FFY 2024 SPP/APR, the State must describe the specific actions that were taken to verify the correction. If the State did not identify any findings of noncompliance in FFY 2023, although its FFY 2023 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings of noncompliance in FFY 2023. If the State did not issue any findings because it has adopted procedures that permit its LEAs to correct noncompliance prior to the State's issuance of a finding, the explanation must include how the State verified, prior to issuing a finding, that the LEA has corrected each individual case of child-specific noncompliance and is correctly implementing the specific regulatory requirements.

Response to actions required in FFY 2023 SPP/APR

For information on the correction of findings of noncompliance for FFY 2023, please see the section titled "Correction of Findings of Noncompliance Identified in FFY 2023."

13 - OSEP Response

13 - Required Actions

Because the State reported less than 100% compliance for FFY 2024, the State must report on the status of correction of noncompliance identified in FFY 2024 for this indicator. When reporting on the correction of noncompliance, the State must report, in the FFY 2025 SPP/APR, that it has verified that each LEA with noncompliance identified in FFY 2024 for this indicator: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the LEA and no outstanding corrective action exists under a State complaint or due process hearing decision for the child, consistent with OSEP QA 23-01. In the FFY 2025 SPP/APR, the State must describe the specific actions that were taken to verify the correction. If the State did not identify any findings of noncompliance in FFY 2024, although its FFY 2024 data reflect less than 100% compliance, provide an explanation of why the State did not identify any findings. If the State did not issue any findings because it has adopted procedures that permit its LEAs to correct noncompliance prior to the State's issuance of a finding, the explanation must include how the State verified, prior to issuing a finding, that the LEA has corrected each individual case of child-specific noncompliance and is correctly implementing the specific regulatory requirements.

Indicator 14: Post-School Outcomes

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part B / Effective Transition

Results indicator: Percent of youth who are no longer in secondary school, had IEPs in effect at the time they left school, and were:

- A. Enrolled in higher education within one year of leaving high school.
- B. Enrolled in higher education or competitively employed within one year of leaving high school.
- C. Enrolled in higher education or in some other postsecondary education or training program; or competitively employed or in some other employment within one year of leaving high school.

(20 U.S.C. 1416(a)(3)(B))

Data Source

State selected data source.

Measurement

- A. Percent enrolled in higher education = $\left[\frac{\text{(\# of youth who are no longer in secondary school, had IEPs in effect at the time they left school and were enrolled in higher education within one year of leaving high school)}}{\text{(\# of respondent youth who are no longer in secondary school and had IEPs in effect at the time they left school)}} \right] \times 100$.
- B. Percent enrolled in higher education or competitively employed within one year of leaving high school = $\left[\frac{\text{(\# of youth who are no longer in secondary school, had IEPs in effect at the time they left school and were enrolled in higher education or competitively employed within one year of leaving high school)}}{\text{(\# of respondent youth who are no longer in secondary school and had IEPs in effect at the time they left school)}} \right] \times 100$.
- C. Percent enrolled in higher education, or in some other postsecondary education or training program; or competitively employed or in some other employment = $\left[\frac{\text{(\# of youth who are no longer in secondary school, had IEPs in effect at the time they left school and were enrolled in higher education, or in some other postsecondary education or training program; or competitively employed or in some other employment)}}{\text{(\# of respondent youth who are no longer in secondary school and had IEPs in effect at the time they left school)}} \right] \times 100$.

Instructions

Sampling of youth who had IEPs and are no longer in secondary school is allowed. When sampling is used, submit a description of the sampling methodology outlining how the design will yield valid and reliable estimates of the target population. (See [General Instructions](#) on page 3 for additional instructions on sampling.)

Collect data by September 2025 on students who left school during 2023-2024, timing the data collection so that at least one year has passed since the students left school. Include students who dropped out during 2023-2024 or who were expected to return but did not return for the current school year. This includes all youth who had an IEP in effect at the time they left school, including those who graduated with a regular diploma or some other credential, dropped out, or aged out.

I. Definitions

Enrolled in higher education as used in measures A, B, and C means youth have been enrolled on a full- or part-time basis in a community college (two-year program) or college/university (four or more year program) for at least one complete term, at any time in the year since leaving high school.

Competitive employment as used in measures B and C: States have two options to report data under “competitive employment”:

Option 1: Use the same definition as used to report in the FFY 2015 SPP/APR, i.e., competitive employment means that youth have worked for pay at or above the minimum wage in a setting with others who are nondisabled for a period of 20 hours a week for at least 90 days at any time in the year since leaving high school. This includes military employment.

Option 2: States report in alignment with the term “competitive integrated employment” and its definition, in section 7(5) of the Rehabilitation Act of 1973, as amended by Workforce Innovation and Opportunity Act (WIOA). For the purpose of defining the rate of compensation for students working on a “part-time basis” under this category, OSEP maintains the standard of 20 hours a week for at least 90 days at any time in the year since leaving high school. This definition applies to military employment.

Enrolled in other postsecondary education or training as used in measure C, means youth have been enrolled on a full- or part-time basis for at least 1 complete term at any time in the year since leaving high school in an education or training program (e.g., Job Corps, adult education, workforce development program, vocational technical school which is less than a two-year program).

Some other employment as used in measure C means youth have worked for pay or been self-employed for a period of at least 90 days at any time in the year since leaving high school. This includes working in a family business (e.g., farm, store, fishing, ranching, catering services).

II. Data Reporting

States must describe the metric used to determine representativeness (e.g., +/- 3% discrepancy in the proportion of responders compared to target group).

Provide the total number of targeted youth in the sample or census.

Provide the actual numbers for each of the following mutually exclusive categories. The actual number of “leavers” who are:

1. Enrolled in higher education within one year of leaving high school;
2. Competitively employed within one year of leaving high school (but not enrolled in higher education);
3. Enrolled in some other postsecondary education or training program within one year of leaving high school (but not enrolled in higher education or competitively employed);
4. In some other employment within one year of leaving high school (but not enrolled in higher education, some other postsecondary education or training program, or competitively employed).

“Leavers” should only be counted in one of the above categories, and the categories are organized hierarchically. So, for example, “leavers” who are enrolled in full- or part-time higher education within one year of leaving high school should only be reported in category 1, even if they also

happen to be employed. Likewise, “leavers” who are not enrolled in either part- or full-time higher education, but who are competitively employed, should only be reported under category 2, even if they happen to be enrolled in some other postsecondary education or training program.

States must compare the response rate for the reporting year to the response rate for the previous year (e.g., in the FFY 2024 SPP/APR, compare the FFY 2024 response rate to the FFY 2023 response rate), and describe strategies that will be implemented which are expected to increase the response rate year over year, particularly for those groups that are underrepresented.

The State must also analyze the response rate to identify potential nonresponse bias and take steps to reduce any identified bias and promote response from a broad cross section of youth who are no longer in secondary school and had IEPs in effect at the time they left school.

III. Reporting on the Measures/Indicators

Targets must be established for measures A, B, and C.

Measure A: For purposes of reporting on the measures/indicators, please note that any youth enrolled in an institution of higher education (that meets any definition of this term in the Higher Education Act (HEA)) within one year of leaving high school *must* be reported under measure A. This could include youth who also happen to be competitively employed, or in some other training program; however, the key outcome we are interested in here is enrollment in higher education.

Measure B: All youth reported under measure A should also be reported under measure B, in addition to all youth that obtain competitive employment within one year of leaving high school.

Measure C: All youth reported under measures A and B should also be reported under measure C, in addition to youth that are enrolled in some other postsecondary education or training program, or in some other employment.

Include the State’s analysis of the extent to which the response data are representative of the demographics of youth who are no longer in secondary school and had IEPs in effect at the time they left school. States must include race/ethnicity in their analysis. In addition, the State’s analysis must include at least one of the following demographics: disability category, gender, geographic location, and/or another demographic category approved through the stakeholder input process.

If the analysis shows that the response data are not representative of the demographics of youth who are no longer in secondary school and had IEPs in effect at the time they left school, describe the strategies that the State will use to ensure that in the future the response data are representative of those demographics. In identifying such strategies, the State should consider factors such as how the State collected the data.

14 - Indicator Data

Historical Data

Measure	Baseline	FFY	2019	2020	2021	2022	2023
A	2022	Target ≥	15.75%	15.75%	15.85%		13.08%
A	13.08%	Data	17.30%	12.72%	12.73%	13.08%	15.33%
B	2022	Target ≥	60.75%	60.75%	60.85%		63.76%
B	63.76%	Data	62.87%	59.36%	65.58%	63.76%	62.90%
C	2022	Target ≥	79.75%	79.75%	79.85%		79.03%
C	79.83%	Data	78.48%	73.98%	80.52%	79.83%	73.11%

Targets

FFY	2024	2025
Target A ≥	13.18%	13.28%
Target B ≥	63.86%	63.96%
Target C ≥	79.50%	80.00%

Targets: Description of Stakeholder Input

The Special Education Advisory Panel (SEAP) in Montana has been in existence since 2013. The SEAP is made up of 16 members, seven of whom are parents of students with disabilities. The panel is fully vested and broadly representative of Montana. Many of the panel members serve in other agency or organization leadership positions or on advisory councils as the voice of students with disabilities. This enables the SEA to draw insight and advice from a diverse group of stakeholders with an understanding of Montana’s unique needs and strengths.

In the 2024-25 and 2025-26 school years, the SEA asked for input on Indicators 3, 4, 9, and 10 from the SEAP. The SEA presented information on the SPP/APR as a whole and then dug into the specific indicators for feedback on targets and proposed methodological changes. The SEAP agreed with the SEA’s proposal. Meeting minutes from discussions with SEAP as well as presentation materials have been posted publicly for all stakeholder review.

and input on the state website for SEAP: <https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education/Regulations-and-Guidance#10965413037-federal-requirements>.

In the spring of every school year, the SEA brings together parents, Montana's Parent Training and Information center the Montana Empowerment Center (MEC), the SEAP, and other state agencies for a joint partnership meeting. During this meeting the SEA reviews the APR submitted in February. The SEA asks for suggestions on how to potentially improve the outcomes of the indicators along with doing a data drill down of the state data and district level data.

In addition to the above-mentioned stakeholders, the SEA worked with many other stakeholder groups that support students with disabilities. Those groups include but are not limited to:

Monthly Special Education Director's calls

Montana Council for Exceptional Children (MCEC) – presented on updates at the SEA, national level, and writing compliant special education paperwork

Vocational Rehabilitation and Blind Services – strengthening our secondary transition

Summer Institute

Montana Council of Administrators of Special Education (MCASE)

Higher Education Consortium (HEC)

Dawson Community College – assisted in setting up level 2 of the ParaPathways Program

CSPD Regional Directors

Montana Empowerment Center – Monthly meetings

Disability Rights Montana

FFY 2024 SPP/APR Data

Total number of targeted youth in the sample or census	1,304
Number of respondent youth who are no longer in secondary school and had IEPs in effect at the time they left school	857
Response Rate	65.72%
1. Number of respondent youth who enrolled in higher education within one year of leaving high school	138
2. Number of respondent youth who competitively employed within one year of leaving high school	373
3. Number of respondent youth enrolled in some other postsecondary education or training program within one year of leaving high school (but not enrolled in higher education or competitively employed)	42
4. Number of respondent youth who are in some other employment within one year of leaving high school (but not enrolled in higher education, some other postsecondary education or training program, or competitively employed).	109

Measure	Number of respondent youth	Number of respondent youth who are no longer in secondary school and had IEPs in effect at the time they left school	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
A. Enrolled in higher education (1)	138	857	15.33%	13.18%	16.10%	Met target	No Slippage
B. Enrolled in higher education or competitively employed within one year of leaving high school (1 +2)	511	857	62.90%	63.86%	59.63%	Did not meet target	Slippage
C. Enrolled in higher education, or in some other	662	857	73.11%	79.50%	77.25%	Did not meet target	No Slippage

Measure	Number of respondent youth	Number of respondent youth who are no longer in secondary school and had IEPs in effect at the time they left school	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
postsecondary education or training program; or competitively employed or in some other employment (1+2+3+4)							

Part	Reasons for slippage, if applicable
B	The FFY 2024 Indicator 14B data reflects a 3.27 percentage point decrease from the percentage reported in FFY 2023. Through more in-depth data analyses, the state identified some potential reasons for the decline. Specifically, the state focused on the changes in competitive employment, given the overall state increase in the percent of respondents enrolled in higher education (see Indicator 14A). First, the state observed an overall increase in the number of respondents reporting employment that does not meet criteria for competitive employment. From FFY 2023 to FFY 2024, there was a 60.29% increase in the number of respondents reporting “in other employment.” The percent of the respondent population reporting “in other employment” from FFY 2023 to FFY 2024 increased by 4.45 percentage points. Conversely, the percentage of the respondent population reporting “in competitive employment” decreased by 4.04 percentage points. The notable rise in the population of those reporting “in other employment” contributed to the overall decrease in the percentage of those reporting competitive employment. The increase in the percentage for 14C, which includes “in other employment” in the total, demonstrates the increase in other employment across the state. There are likely multiple reasons for increase of respondents reporting “in other employment.” First, due to the large tourism and farming industries in Montana, work can often be seasonal and thus may not meet criteria for competitive employment. Further, the state has observed a rise over the last several years in the number of respondents reporting self-employment and employment in family business. There was a 287.50% increase in the number of respondents reporting self-employment or employment in family business from FFY 2023 to FFY 2024. This is a substantial contributor to the overall decrease in competitive employment and increase in other employment. Finally, the state evaluated individual LEAs to see if any notable year-to-year trends across LEAs might reveal reasons for slippage. For four of the largest LEAs in the state (all four are captured within the 12 largest LEAs, in terms of student population), there was an average decrease of 6.37 percentage points from FFY 2023 to FFY 2024. These LEAs comprised nearly 20% of the total respondent population, meaning their data has a significant impact on the statewide data. The decrease in the percentage of respondents competitively employed was also likely a reason for the overall slippage for Indicator 14B.

Please select the reporting option your State is using:

Option 2: Report in alignment with the term “competitive integrated employment” and its definition, in section 7(5) of the Rehabilitation Act, as amended by Workforce Innovation and Opportunity Act (WIOA), and 34 CFR §361.5(c)(9). For the purpose of defining the rate of compensation for students working on a “part-time basis” under this category, OSEP maintains the standard of 20 hours a week for at least 90 days at any time in the year since leaving high school. This definition applies to military employment.

Response Rate

FFY	2023	2024
Response Rate	67.21%	65.72%

Describe the metric used to determine representativeness (e.g., +/- 3% discrepancy in the proportion of responders compared to target group).

To assess the representativeness of the respondents with respect to the population, the distribution of population subgroups among respondents was compared to the distribution in the population. Montana’s threshold was +/- 3% (state interprets this as 3 percentage points difference).

Include the State’s analyses of the extent to which the response data are representative of the demographics of youth who are no longer in secondary school and had IEPs in effect at the time they left school. States must include race/ethnicity in its analysis. In addition, the State’s analysis must include at least one of the following demographics: disability category, gender, geographic location, and/or another demographic category approved through the stakeholder input process.

The state assessed the representativeness of respondents to the Indicator 14 post-school survey by comparing data on students reported as exiting special education in the prior year to the respondent data for the demographics categories of race/ethnicity and disability category and applying the representativeness metric outlined above. The data source used for Indicator 14 is the FS009 EDFacts submission (only includes those students exiting who are no longer in secondary school and had IEPs in effect at the time of exit), meaning the state comparison data comes from the FS009 submission for the relevant reporting period and the respondent data comes from responses to surveys that were sent to all students reported as exiting who were

no longer in secondary school and had IEPs in effect at the time of exit in the FS009 submission for the relevant reporting period (only includes students who exited as graduated with a regular diploma or some other credential, dropped out, or aged out).

In FFY 2024, the respondent data for all racial/ethnic groups and disability categories was considered representative of the state population of students no longer in secondary school who had IEPs in effect at the time they left school. None of the racial/ethnic groups or disability categories had rates consistent with those meeting the state's criteria for no representativeness (+/- 3 percentage points). The differences between the respondent groups and the state population in the two demographics categories are provided below.

Race/Ethnicity (respondent group percentage minus state population percentage)

American Indian or Alaska Native: +0.88

Asian: -0.03

Black or African American: -0.34

Hispanic/Latino: -0.54

Two or more races: +0.41

Native Hawaiian or Other Pacific Islander: -0.08

White: -0.30

Disability Category (respondent group percentage minus state population percentage)

Autism: +0.63

Emotional Disturbance: +0.16

Hearing Impairment: 0.00

Intellectual Disability: +0.10

Multiple Disabilities: +0.50

Other Health Impairments: -0.85

Specific Learning Disabilities: -0.67

Speech or Language Impairments: +0.08

Traumatic Brain Injury: +0.04

Visual Impairment: -0.04

The response data is representative of the demographics of youth who are no longer in school and had IEPs in effect at the time they left school. (yes/no)

YES

If no, describe the strategies that the State will use to ensure that in the future the response data are representative of those demographics.

Describe strategies that will be implemented which are expected to increase the response rate year over year, particularly for those groups that are underrepresented.

The state continues to prioritize ensuring that there is a strong response rate for Indicator 14. By allowing LEAs to collect the data rather than a state or vendor, the hope is that students and/or their families are more inclined to respond given that they are familiar with the people reaching out to them. The state's oversight of the system by which the data are collected allows state staff to monitor responses as they come and ascertain whether there are LEAs in which response rates are low. The state will continue making a concerted effort to monitor the information gathered and maintain contact with LEAs to ensure they are reaching out students as appropriate. Further, the state will continue providing TA to LEAs related to strategies and mechanisms by which the LEAs could increase the number of responses from students exiting with IEPs the prior year to ensure that the responses are as representative as possible of the population. The success of these efforts is manifest in the increased representativeness of American Indian and white respondents and respondents in the disability categories of OHI and SLD.

Describe the analysis of the response rate including any nonresponse bias that was identified, and the steps taken to reduce any identified bias and promote response from a broad cross section of youth who are no longer in secondary school and had IEPs in effect at the time they left school.

To analyze nonresponse bias, the state considered multiple factors. First, the state analyzed the Indicator 14 survey response rates, as the best way to limit nonresponse bias is to ensure that the response rate is high. Indeed, high response rates limit the risk of under- or over-representation of particular groups unduly influencing statewide data. Historically, Montana has had a very strong response rate that has resulted in well over a majority of exiters responding to the survey. While the response rate for FFY 2024 decreased slightly from the rate reported in FFY 2023 (1.49 percentage point decrease), the response rate of 65.72% is still commendable and among the highest response rates nationally. The positive results of this substantial response rate are evidenced in the representativeness of the two demographics groups of race/ethnicity and disability category. On point, all demographics categories met the state threshold for representativeness.

After analyzing the response rate and the representativeness of the two demographics groups, the state investigated whether nonresponse bias existed in the levels of engagement for respondents compared to nonrespondents in the two demographics groups. To do this, the state elected to look at the survey responses of any demographic category in which the percentage of the population of the respondents was 0.75+ percentage points less than the statewide percentage of the population. One demographic category met these criteria: the disability category of Other Health Impairments. Students with the disability category of Other Health Impairments who responded to the survey were underrepresented by 0.85 percentage points when compared to the state population of exiting students with Other Health Impairments. When reviewing disaggregated responses to survey questions by disability category, the state determined that exiters identified with Other Health Impairments had percentages for Measures A, B, and C that were all higher than the state data. This could indicate that if this group of the exiter population was fully representative, the state averages could be slightly higher for each of the indicator measures.

While the state does not perceive the data to indicate nonresponse bias, it recognizes there were differences in responses for groups over- and underrepresented in particular racial/ethnic groups and disability categories. In order to address the possible nonresponse bias identified, the state will continue making concerted efforts to improve the survey response rate, which should in turn address representativeness. The state will look into the possibility of weighting data in future years to control for nonresponse bias and provide post-school outcome rates that may more accurately reflect statewide post-school outcomes. Further, the state will continue assessing the times in which surveys are being submitted to determine if there are any trends or key information that might be relevant to assess whether nonresponse bias might be occurring. If it is determined to possibly be occurring, the state will provide technical assistance and support to LEAs, particularly those most impacted.

Sampling Question	Yes / No
Was sampling used?	NO
Survey Question	Yes / No
Was a survey used?	YES
If yes, is it a new or revised survey?	NO

Provide additional information about this indicator (optional)

N/A

14 - Prior FFY Required Actions

None

14 - OSEP Response

14 - Required Actions

Indicator 15: Resolution Sessions

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part B / General Supervision

Results Indicator: Percent of hearing requests that went to resolution sessions that were resolved through resolution session settlement agreements.
(20 U.S.C. 1416(a)(3)(B))

Data Source

Same data as used for reporting to the Department under section 618 of the IDEA, using the definitions in ED Facts file specifications FS229.

Measurement

Percent = (3.1(a) divided by 3.1) times 100.

Instructions

Sampling is not allowed.

Describe the results of the calculations and compare the results to the target.

States are not required to establish baselines or targets if the number of resolution sessions is less than 10. In a reporting period when the number of resolution sessions reaches 10 or greater, develop baseline and targets and report on them in the corresponding SPP/APR.

States may express their targets in a range (e.g., 75-85%).

If the data reported in this indicator are not the same as the State's data under IDEA section 618, explain.

States are not required to report data at the LEA level.

15 - Indicator Data

Select yes to use target ranges

Target Range not used

Prepopulated Data

Source	Date	Description	Data
SY 2024-25 IDEA Part B Dispute Resolution - Due Process Complaints (ED Facts file spec FS229; Data group 896)	11/19/2025	3.1 Number of resolution sessions	1
SY 2024-25 IDEA Part B Dispute Resolution - Due Process Complaints (ED Facts file spec FS229; Data group 896)	11/19/2025	3.1(a) Number resolution sessions resolved through settlement agreements	1

Select yes if the data reported in this indicator are not the same as the State's data reported under section 618 of the IDEA.

NO

Targets: Description of Stakeholder Input

The Special Education Advisory Panel (SEAP) in Montana has been in existence since 2013. The SEAP is made up of 16 members, seven of whom are parents of students with disabilities. The panel is fully vested and broadly representative of Montana. Many of the panel members serve in other agency or organization leadership positions or on advisory councils as the voice of students with disabilities. This enables the SEA to draw insight and advice from a diverse group of stakeholders with an understanding of Montana's unique needs and strengths.

In the 2024-25 and 2025-26 school years, the SEA asked for input on Indicators 3, 4, 9, and 10 from the SEAP. The SEA presented information on the SPP/APR as a whole and then dug into the specific indicators for feedback on targets and proposed methodological changes. The SEAP agreed with the SEA's proposal. Meeting minutes from discussions with SEAP as well as presentation materials have been posted publicly for all stakeholder review and input on the state website for SEAP: <https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education/Regulations-and-Guidance#10965413037-federal-requirements>.

In the spring of every school year, the SEA brings together parents, Montana's Parent Training and Information center the Montana Empowerment Center (MEC), the SEAP, and other state agencies for a joint partnership meeting. During this meeting the SEA reviews the APR submitted in February. The SEA asks for suggestions on how to potentially improve the outcomes of the indicators along with doing a data drill down of the state data and district level data.

In addition to the above-mentioned stakeholders, the SEA worked with many other stakeholder groups that support students with disabilities. Those groups include but are not limited to:

Monthly Special Education Director's calls

Montana Council for Exceptional Children (MCEC) – presented on updates at the SEA, national level, and writing compliant special education paperwork
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Higher Education Consortium (HEC)

Dawson Community College – assisted in setting up level 2 of the ParaPathways Program

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Disability Rights Montana

Historical Data

Baseline Year	Baseline Data
2005	

FFY	2019	2020	2021	2022	2023
Target >=					
Data					

Targets

FFY	2024	2025
Target >=		

FFY 2024 SPP/APR Data

3.1(a) Number resolutions sessions resolved through settlement agreements	3.1 Number of resolutions sessions	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
1	1			100.00%	N/A	N/A

Provide additional information about this indicator (optional)

The state reported fewer than ten resolution sessions in FFY 2024. The state is not required to provide targets until any fiscal year in which the number of sessions is fewer than 10.

15 - Prior FFY Required Actions

None

15 - OSEP Response

The State reported fewer than ten resolution sessions held in FFY 2024. The State is not required to meet its targets until any fiscal year in which ten or more resolution sessions were held.

15 - Required Actions

Indicator 16: Mediation

Instructions and Measurement

Monitoring Priority: Effective General Supervision Part B / General Supervision

Results indicator: Percent of mediations held that resulted in mediation agreements.

(20 U.S.C. 1416(a)(3)(B))

Data Source

Same data as used for reporting to the Department under section 618 of the IDEA, using the definitions in ED*Facts* file specification FS228.

Measurement

Percent = $(2.1(a)(i) + 2.1(b)(i))$ divided by 2.1 times 100.

Instructions

Sampling is not allowed.

Describe the results of the calculations and compare the results to the target.

States are not required to establish baselines or targets if the number of mediations is less than 10. In a reporting period when the number of mediations reaches 10 or greater, develop baseline and targets and report on them in the corresponding SPP/APR.

States may express their targets in a range (e.g., 75-85%).

If the data reported in this indicator are not the same as the State's data under IDEA section 618, explain.

States are not required to report data at the LEA level.

16 - Indicator Data

Select yes to use target ranges

Target Range not used

Prepopulated Data

Source	Date	Description	Data
SY 2024-25 IDEA Part B Dispute Resolution - Mediation Requests (ED <i>Facts</i> file spec FS228; Data group 895)	11/19/2025	2.1 Mediations held	3
SY 2024-25 IDEA Part B Dispute Resolution - Mediation Requests (ED <i>Facts</i> file spec FS228; Data group 895)	11/19/2025	2.1.a.i Mediations agreements related to due process complaints	1
SY 2024-25 IDEA Part B Dispute Resolution - Mediation Requests (ED <i>Facts</i> file spec FS228; Data group 895)	11/19/2025	2.1.b.i Mediations agreements not related to due process complaints	1

Select yes if the data reported in this indicator are not the same as the State's data reported under section 618 of the IDEA.

NO

Targets: Description of Stakeholder Input

The Special Education Advisory Panel (SEAP) in Montana has been in existence since 2013. The SEAP is made up of 16 members, seven of whom are parents of students with disabilities. The panel is fully vested and broadly representative of Montana. Many of the panel members serve in other agency or organization leadership positions or on advisory councils as the voice of students with disabilities. This enables the SEA to draw insight and advice from a diverse group of stakeholders with an understanding of Montana's unique needs and strengths.

In the 2024-25 and 2025-26 school years, the SEA asked for input on Indicators 3, 4, 9, and 10 from the SEAP. The SEA presented information on the SPP/APR as a whole and then dug into the specific indicators for feedback on targets and proposed methodological changes. The SEAP agreed with the SEA's proposal. Meeting minutes from discussions with SEAP as well as presentation materials have been posted publicly for all stakeholder review and input on the state website for SEAP: <https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education/Regulations-and-Guidance#10965413037-federal-requirements>.

In the spring of every school year, the SEA brings together parents, Montana's Parent Training and Information center the Montana Empowerment Center (MEC), the SEAP, and other state agencies for a joint partnership meeting. During this meeting the SEA reviews the APR submitted in February. The SEA asks for suggestions on how to potentially improve the outcomes of the indicators along with doing a data drill down of the state data and district level data.

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Dawson Community College – assisted in setting up level 2 of the ParaPathways Program

CSPD Regional Directors
Montana Empowerment Center – Monthly meetings
Disability Rights Montana

Historical Data

Baseline Year	Baseline Data
2005	

FFY	2019	2020	2021	2022	2023
Target >=					
Data		100.00%		50.00%	100.00%

Targets

FFY	2024	2025
Target >=		

FFY 2024 SPP/APR Data

2.1.a.i Mediation agreements related to due process complaints	2.1.b.i Mediation agreements not related to due process complaints	2.1 Number of mediations held	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
1	1	3	100.00%		66.67%	N/A	N/A

Provide additional information about this indicator (optional)

The state reported fewer than ten mediations held in FFY 2024. The state is not required to provide targets until any fiscal year in which ten or more mediations were held.

16 - Prior FFY Required Actions

None

16 - OSEP Response

The State reported fewer than ten mediations held in FFY 2024. The State is not required to meet its targets until any fiscal year in which ten or more mediations were held.

16 - Required Actions

Indicator 17: State Systemic Improvement Plan

Instructions and Measurement

Monitoring Priority: General Supervision

Results indicator: The State's SPP/APR includes a State Systemic Improvement Plan (SSIP) that meets the requirements set forth for this indicator.

Measurement

The State's SPP/APR includes an SSIP that is a comprehensive, ambitious, yet achievable multi-year plan for improving results for children with disabilities. The SSIP includes each of the components described below.

Instructions

Baseline Data: The State must provide baseline data that must be expressed as a percentage, and which is aligned with the State-identified Measurable Result(s) (SiMR) for Children with Disabilities.

Targets: In its FFY 2020 SPP/APR, due February 1, 2022, the State must provide measurable and rigorous targets (expressed as percentages) for each of the six years from FFY 2020 through FFY 2025. The State's FFY 2025 target must demonstrate improvement over the State's baseline data.

Updated Data: In its FFYs 2020 through FFY 2025 SPPs/APRs, due February 2022 through February 2027, the State must provide updated data for that specific FFY (expressed as percentages) and that data must be aligned with the State-identified Measurable Result(s) Children with Disabilities. In its FFYs 2020 through FFY 2025 SPPs/APRs, the State must report on whether it met its target.

Overview of the Three Phases of the SSIP

It is of the utmost importance to improve results for children with disabilities by improving educational services, including special education and related services. Stakeholders, including parents of children with disabilities, local educational agencies, the State Advisory Panel, and others, are critical participants in improving results for children with disabilities and should be included in developing, implementing, evaluating, and revising the SSIP and included in establishing the State's targets under Indicator 17. The SSIP should include information about stakeholder involvement in all three phases.

Phase I: Analysis:

- Data Analysis;
- Analysis of State Infrastructure to Support Improvement and Build Capacity;
- State-identified Measurable Result(s) for Children with Disabilities;
- Selection of Coherent Improvement Strategies; and
- Theory of Action.

Phase II: Plan (which, in addition to the Phase I content (including any updates) outlined above):

- Infrastructure Development;
- Support for local educational agency (LEA) Implementation of Evidence-Based Practices; and
- Evaluation.

Phase III: Implementation and Evaluation (which, in addition to the Phase I and Phase II content (including any updates) outlined above):

- Results of Ongoing Evaluation and Revisions to the SSIP.

Specific Content of Each Phase of the SSIP

Refer to FFY 2013-2015 Measurement Table for detailed requirements of Phase I and Phase II SSIP submissions.

Phase III should only include information from Phase I or Phase II if changes or revisions are being made by the State and/or if information previously required in Phase I or Phase II was not reported.

Phase III: Implementation and Evaluation

In Phase III, the State must, consistent with its evaluation plan described in Phase II, assess and report on its progress implementing the SSIP. This includes: (A) data and analysis on the extent to which the State has made progress toward and/or met the State-established short-term and long-term outcomes or objectives for implementation of the SSIP and its progress toward achieving the State-identified Measurable Result(s) for Children with Disabilities (SiMR); (B) the rationale for any revisions that were made, or that the State intends to make, to the SSIP as the result of implementation, analysis, and evaluation; and (C) a description of the meaningful stakeholder engagement. If the State intends to continue implementing the SSIP without modifications, the State must describe how the data from the evaluation support this decision.

A. Data Analysis

As required in the Instructions for the Indicator/Measurement, in its FFYs 2020 through 2025 SPPs/APRs, the State must report data for that specific FFY (expressed as actual numbers and percentages) that are aligned with the SiMR. The State must report on whether the State met its target. In addition, the State may report on any additional data (e.g., progress monitoring data) that were collected and analyzed that would suggest progress toward the SiMR. States using a subset of the population from the indicator (e.g., a sample, cohort model) should describe how data are collected and analyzed for the SiMR if that was not described in Phase I or Phase II of the SSIP.

B. Phase III Implementation, Analysis and Evaluation

The State must provide a narrative or graphic representation, (e.g., a logic model) of the principal activities, measures and outcomes that were implemented since the State's last SSIP submission (i.e., February 1, 2025). The evaluation should align with the theory of action described in Phase I and the evaluation plan described in Phase II. The State must describe any changes to the activities, strategies, or timelines described in Phase II and include a rationale or justification for the changes. If the State intends to continue implementing the SSIP without modifications, the State must describe how the data from the evaluation support this decision.

The State must summarize the infrastructure improvement strategies that were implemented, and the short-term outcomes achieved, including the measures or rationale used by the State and stakeholders to assess and communicate achievement. Relate short-term outcomes to one or more areas of a systems framework (e.g., governance, data, finance, accountability/monitoring, quality standards, professional development and/or technical assistance) and explain how these strategies support system change and are necessary for: (a) achievement of the SiMR; (b) sustainability of systems improvement efforts; and/or (c) scale-up. The State must describe the next steps for each infrastructure improvement strategy and the anticipated outcomes to be attained during the next fiscal year (e.g., for the FFY 2024 APR, report on anticipated outcomes to be obtained during FFY 2025, i.e., July 1, 2025-June 30, 2026).

The State must summarize the specific evidence-based practices that were implemented and the strategies or activities that supported their selection and ensured their use with fidelity. Describe how the evidence-based practices, and activities or strategies that support their use, are intended to impact the SiMR by changing program/district policies, procedures, and/or practices, teacher/provider practices (e.g., behaviors), parent/caregiver outcomes,

and/or child outcomes. Describe any additional data (e.g., progress monitoring data) that was collected to support the on-going use of the evidence-based practices and inform decision-making for the next year of SSIP implementation.

C. Stakeholder Engagement

The State must describe the specific strategies implemented to engage stakeholders in key improvement efforts and how the State addressed concerns, if any, raised by stakeholders through its engagement activities.

Additional Implementation Activities

The State should identify any activities not already described that it intends to implement in the next fiscal year (e.g., for the FFY 2024 APR, report on activities it intends to implement in FFY 2025, i.e., July 1, 2025-June 30, 2026) including a timeline, anticipated data collection and measures, and expected outcomes that are related to the SiMR. The State should describe any newly identified barriers and include steps to address these barriers.

17 - Indicator Data

Section A: Data Analysis

What is the State-identified Measurable Result (SiMR)?

The number and percent of American Indian students with disabilities who graduate with a regular high school diploma will increase.

Has the SiMR changed since the last SSIP submission? (yes/no)

NO

Is the State using a subset of the population from the indicator (e.g., a sample, cohort model)? (yes/no)

NO

Is the State’s theory of action new or revised since the previous submission? (yes/no)

NO

Please provide a link to the current theory of action.

https://opi.mt.gov/Portals/182/Page%20Files/Special%20Education/Annual%20Performance%20Report/MT_ToA_%20FINAL.pdf

Progress toward the SiMR

Please provide the data for the specific FFY listed below (expressed as actual number and percentages).

Select yes if the State uses two targets for measurement. (yes/no)

NO

Historical Data

Baseline Year	Baseline Data
2023	60.83%

Targets

FFY	Current Relationship	2024	2025
Target	Data must be greater than or equal to the target	68.90%	69.00%

FFY 2024 SPP/APR Data

Number of American Indian youth with IEPs (ages 14-21) who exited special education due to graduating with a regular high school diploma.	Number of all American Indian youth with IEPs who exited special education (ages 14-21) in the exit categories of: a) graduated with a regular high school diploma, b) graduated with a state-defined alternative diploma, c) received a certificate, d) reached maximum age, or e) dropped out.	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
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110	212	60.83%	68.90%	51.89%	Did not meet target	Slippage
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Provide reasons for slippage, if applicable

In the FFY 2024 SPP/APR, the rate of American Indian students with disabilities exiting special education due to graduating with a regular high school diploma decreased by 8.94 percentage points. The SEA conducted analyses of the data to determine the potential reasons for the slippage. In this review, the SEA identified five LEAs with notable decreases in the number of American Indian students with disabilities graduating with a regular high school diploma in the FFY 2024 reporting period (2023-24 school year). These LEAs are inclusive of large LEAs in terms of student population, as well as LEAs that predominantly serve American Indian students. These five LEAs comprised nearly 24% of the American Indian graduates in FFY 2024 while they comprised 44% of the American Indian graduates in FFY 2023. This demonstrates the decrease in overall American Indian graduates in LEAs that have historically made up a large percentage of data and contributed positively to the graduation rate of American Indian students with disabilities. This year, these five LEAs demonstrated a 55% decrease in the number of American Indian students with disabilities graduating with a regular high school diploma. This significant decrease in these five LEAs likely contributed to the observed slippage for Indicator 17.

Provide the data source for the FFY 2024 data.

The data for the FFY 2024 Data came from the Graduation/Dropout certification taken in Fall 2024. This certification is done within Montana's statewide student information system.

Please describe how data are collected and analyzed for the SiMR.

Data are collected within the statewide student information system and certified to the SEA through the Graduation/Dropout certification. Data is verified and analyzed by the Data Operations team of the SEA.

Optional: Has the State collected additional data (i.e., benchmark, CQI, survey) that demonstrates progress toward the SiMR? (yes/no)

NO

Did the State identify any general data quality concerns, unrelated to COVID-19, which affected progress toward the SiMR during the reporting period? (yes/no)

NO

Did the State identify any data quality concerns directly related to the COVID-19 pandemic during the reporting period? (yes/no)

NO

Section B: Implementation, Analysis and Evaluation

Please provide a link to the State's current evaluation plan.

<https://opi.mt.gov/Portals/182/Page%20Files/Special%20Education/Annual%20Performance%20Report/Evaluation%20Questions%20FINAL%202023-26-2020.pdf>

Is the State's evaluation plan new or revised since the previous submission? (yes/no)

NO

Provide a summary of each infrastructure improvement strategy implemented in the reporting period.

Redesigning Internal SEA Infrastructure to Support Intra-agency Collaboration and Coordination

Special Education collaborates with the Tribal Student Achievement and Relations (TSAR) and Indian Education for All (IEFA) units. The TSAR unit builds relationships and shared understandings within the OPI, school districts, and communities to holistically support Montana's American Indian (AI) students. OPI incorporates tribal voices, sharing resources, and building connections through tribal consultation and sovereign government-to-government relationships. TSAR works alongside system partners to create the conditions necessary for AI students to meet their educational and lifelong goals. TSAR strives to engage all school agencies and the OPI to create shared understandings of the importance of language, culture, and healthy identities in the learning process by promoting welcoming environments that serve the whole child with sustained access to Indigenous learning resources and opportunities. The TSAR/IEFA Unit Manager represents OPI on the MT Advisory Council on Indian Education (MACIE).

TSAR, IEFA, SPED staff, and ESSA School Improvement team members meet weekly to discuss and coordinate agency-wide projects, communications with tribal schools, and efforts to support AI students. Many schools on or near reservations are identified for Comprehensive School Improvement under ESSA, and these weekly calls strengthen our internal coordination and understanding amongst OPI staff who work on initiatives for tribal students.

Our Fall 2024 Higher Education Consortium (HEC) Meeting included a presentation on Indigenous Ways of Knowing, and our Spring 2025 meeting included the National Native Children's Trauma Center (NNCTC) and featured a presentation from a tribal college on their 2+2 grow your own teacher program.

The SSIP is part of the CETA unit which improves coordination of PD efforts within the SPDG, SSIP, Regional CSPD, and Montana Autism Education Project (MAEP). In early 2025, our CETA unit and our Coordinated School Health (CSH) unit established our relationship with State Implementation and Scaling-up of Evidence-based Practices (SISEP) as an intensive state to support our Integrated Multi-Tiered System of Support (I-MTSS) Implementation to support the SSIP.

Establish a Data Use Culture at the SEA and LEA level

Our SPDG provided training and coaching in MTSS to 25 districts in 2024-25 to promote system-level problem solving using data-based decision making. Twenty-one MTSS modules are available online for district (DIT) and building implementation teams (BIT). DIT 6: Comprehensive Assessment System and DIT 7: Data Analysis & System Level Problem Solving provide self-paced training for district teams. The BIT Modules emphasize a data use culture at the school level, including BIT 4: Measuring Implementation of MTSS; BIT 5: Comprehensive Screening & Assessment; BIT 6: Systematic Problem Solving; BIT 7: Data Teaming & Pathways for Academics; BIT 8: Data Teaming & Pathways for Behavior; BIT 9: Tier 2 Systems; BIT 10 Tier 3 Systems; and BIT 11: MTSS/RTI Approach to Evaluating SLD. The modules include data forms and tools to build a strong I-MTSS framework and emphasize EBPs.

LEAs on or near Montana's Tribal Reservations sent 65 educators to the 2025 OPI Summer Institute (SI). During 2025 SI, PD was provided to establish a data use culture through 11 sessions covering Data Literacy, Data-Based Individualization (DBI), DBI in math, progress monitoring, using data for Specially Designed Instruction (SDI), MTSS, intervention pathways, school climate data, Youth Risk Behavior Survey (YRBS) Data, and ABC Data for Behavior.

CSPD Regions offered 8 trainings in 2024-25 on data literacy, using math data, MTSS, assessment, diagnostic and progress monitoring data, assessing instructional effectiveness, and behavior data.

Provide Professional Development and Technical Assistance to implement EBPs

Over 400 educators from schools serving AI students attended the 2025 SI. Sessions ranged across all aspects of holistic support for students and/or educators in both academic and behavior EBPs. Multiple sessions on Restorative Practice (RP) were provided as RP continues to be a focal point of the MT SSIP. HS Forum also included full-day RP training in November 2024.

Both HS Forum and SI had multiple sessions on EBPs including science of reading (SOR) targeted to secondary implementation of EB literacy practices. OPI SI included a full-day training on explicit reading and writing instruction, and sessions on I-MTSS, high leverage practices, CTE, secondary transition, EBPs to increase attendance, Behavior Intervention Plans (BIP), Positive Behavior Interventions and Support (PBIS), Universal Design for Learning (UDL), inclusionary practices, and EBPs in mathematics instruction.

Our CSPD offered 25 sessions on EBPs including sessions on Science of Reading strategies, explicit instruction, MTSS, EB behavior strategies or programs, engagement, and literacy.

Some participants in the agency sponsored SPED Endorsement Project engaged in individualized TA this year on the following topics:

1. Effective inclusion design through defining purpose/place/utilizing a planning pyramid
2. Well-being strategies designed to address the why (missing skills) behind the behavior to address the root cause; purposeful fidget reducers and purposeful individual/group techniques to calm anxiety
3. Utilizing coding and Invention Literacy to connect reluctant mathematicians to math, science, and reading; leading to an interconnection across all content areas; seamlessly addressing required MT Technology Content Standards while guiding meaningful interaction with a student's IEP goals around math.

Promote American Indian Youth and Family Empowerment

Within the TSAR unit, American Indian Student Achievement (AISA) Specialists support the implementation of EB and distinct indigenous, whole child strategies within K-12. AISA Specialists focus on the conditions necessary for Indigenous youth, and all MT students, to meet their educational lifelong goals. TSAR facilitates the RISE Native Youth Leadership group. RISE brings AI students from across the state together to foster positive peer connections, celebrate indigenous identities, share cultures, and prepare students to be leaders in their schools and communities. The students meet bi-monthly and organize a yearly, in-person summit where they can connect with Knowledge Keepers and other Indigenous leaders. RISE strengthens students' self-esteem, builds leadership skills, creates positive connections to school and peers, and provides opportunities for connection to cultures and holistic supportive experiences rooted in Indigenous worldview. Through RISE, we foster relationships with AI students, educators, and community members. All students are welcome to participate in RISE and currently about 2-3% of the RISE membership consists of non-Native students. The 2025 RISE Tribal Education Summit was held in East Helena in April 2025. The Summit had 230 students and staff from 16 schools. More than half of the students (53%) attend schools on or near a reservation while 39% attend school in an urban area and around 8% attend school in a small, rural town. Of the 16 schools, 13 are Title I eligible, of which 11 receive school-wide Title I support.

TSAR provides support to school districts in fulfilling ESSA mandated tribal consultation. In March 2025, TSAR provided training to educators on tribal consultation best practices and maintains guidance documents and tools for schools to utilize in conducting tribal consultation.

With MT Special Olympics, our MTSS Youth Days in the Fall of 2024 had 3 schools from tribal areas represented. Youth Days is a statewide PBIS activity focused on building leadership skills of MS/HS students through student-led workshops and community service.

Describe the short-term or intermediate outcomes achieved for each infrastructure improvement strategy during the reporting period including the measures or rationale used by the State and stakeholders to assess and communicate achievement. Please relate short-term outcomes to one or more areas of a systems framework (e.g., governance, data, finance, accountability/monitoring, quality standards, professional development and/or technical assistance) and explain how these strategies support system change and are necessary for: (a) achievement of the SiMR; (b) sustainability of systems improvement efforts; and/or (c) scale-up.

Redesigning Internal SEA Infrastructure to Support Intra-agency Collaboration and Coordination

The report from the 2025 RISE Summit illustrates the SEA intra-agency collaboration and coordination efforts. The Summit included 230 students and staff from 16 schools and 7 Knowledge Keepers. The student surveys illustrated the following positive responses:

- 83% indicated they are motivated to graduate HS
- 79% have confidence they will be successful in life after HS

- 78% are motivated to fulfill their life's purpose.
- 74% felt hopeful or optimistic about their future
- 69% have an idea or what they would like to do with their lives after graduating HS.

Establish a Data Use Culture at the SEA and LEA level

Sixty-five educators from on or near Tribal areas and many schools serving AI students attended the 2025 OPI SI. There were 11 sessions on data use and data-based decision making, and sessions on utilizing Montana Aligned to Standards Through-Year Assessments (MAST) data for instructional planning. OPI Summer Institute feedback showed strong session ratings and active learning was evident in these sessions.

In 2024-25, one larger SPDG district located near a tribal reservation serves a high population of AI students. This district worked on systems for data-based decision making and continued to strengthen their MTSS framework through participation in the training and coaching provided by the SPDG.

Districts continued the use of the MT Early Warning System (EWS) to use data to identify students who are at risk of dropping out of school. In 2025-26 we will be piloting the MTSS PowerSchool Portal and a new statewide EWS for widespread implementation in 2026-27.

Biennially, OPI provides a data report to the Montana State Legislature on American Indian Student Achievement. The Fall 2024 AISA Data Report is located here: https://opi.mt.gov/Portals/182/Page%20Files/Indian%20Education/Indian%20Student%20Achievement/Docs/Data_Report_2024.pdf

While a gap in the achievement levels of AI students exists when compared to non-AI students, there are many areas of improvement within the academic data. Reading proficiency for HS students grew by 5% points between 2022 and 2023 and has surpassed pre-pandemic levels reaching 21% in 2023 as compared to 18% in 2019. Advanced reading proficiency in AI HS students doubled in the last year rising from 3% in 2022 to 6% in 2023. All students in grades 3-8, AI and non-AI, experienced an increase in reading proficiency between 2022 and 2023. HS math proficiency for AI students increased between 2022 and 2023 and has reached pre-pandemic levels of proficiency. In 2018, non-AI HS students had a proficiency rate in math that was 26 percentage points higher than AI high school students. In 2023, that difference is now 20 percentage points, showing a 6% decrease in the gap in math proficiency between AI and non-AI HS students. ACT science proficiency for AI HS students increased from 8% in 2021 to 18% in 2023. The average four-year cohort graduation rate for AI students in 2023 was 67.5% which is higher than the national graduation threshold minimum goal of 67%. Overall, dropout rates fell for AI students between 2022 and 2023. AI students on reservations are the only population showing a decrease in dropout rate over the last six years. The number of AI students receiving dual enrollment credit increased from 240 students in 2018/2019 to 364 students in 2023/2024. The number of students attending community colleges, two-year colleges, and four-year colleges increased between 2018 and 2023. AI students continue to have lower rates of attendance compared to non-AI students. Data indicates a disparity of American Indian students being disciplined in school for all discipline categories.

Provide Professional Development and Technical Assistance to implement EBPs

Of the over 400 educators attending OPI SI, 65 educators were from LEAs on or near Tribal Reservations. Sessions emphasize the use of academic and behavior EBPs. Both HS Forum in November 2024 and OPI SI had multiple sessions on the science of reading specifically targeted to secondary implementation of evidence-based literacy practices. Additionally, OPI SI included a full-day training on explicit reading and writing instruction, multiple sessions on MTSS systems and implementation, and sessions on the following: high leverage practices, MS/HS Career and Technical Education, secondary transitions, EBPs to increase attendance, Behavior Intervention Plans (BIP), Positive Behavior Interventions and Support (PBIS), Universal Design for Learning (UDL), Inclusionary Practices, and EBPs in mathematics instruction.

Restorative Practice at HS Forum trained over 20 educators and over 35 were trained at OPI SI.

Promote American Indian Youth and Family Empowerment

Seventy-nine percent of students who attended the 2025 RISE Summit and completed the post-Summit survey reported their self-esteem increased after attending the 2025 RISE Summit and 65% of students reported a higher feeling of confidence to speak up about things that are important to them. Ninety-one percent of students reported having an opportunity to celebrate Indigenous culture and/or Native identity while at the Summit. Eighty-five percent of students reported forming new, positive relationships as a result of the RISE Summit while 75% reported learning skills or information that they will use later in life.

One of the greatest outcomes of the Summit, which is reflected in the responses of students is the growth in student's self-esteem and confidence to speak up about things that are important to them. Self-esteem positively predicts academic engagement (Zhao et al. 2021). As Zhao et al. (2021) state, Students with high self-esteem have higher self-cognition and academic self-efficacy (p.5); students can better regulate all aspects of available resources and thus achieve their academic expectations and ultimately increase their engagement in learning (Ouweneel et al., 2011; Zhang et al, 2021, p. 5). In Native adolescents specifically, a positive self-image has been correlated with an increase in academic achievement (Reyhner & Carjuzza, 2017; Whitbeck et al., 2001; Whitesell, Mitchell, & Spicer, 2009). In addition, positive self-image in Native adolescents has been linked to better emotional health (Cummins et al., 1999) and a decrease in risky behaviors such as substance use (Allen et al., 2006; Mackin et al., 2012), which impact a student's ability to attend and participate in school.

The number of students (50%) reporting gaining a new personal relationship is also worth noting. Positive peer and non-familial adult relationships have been found to reduce substance use (Whitesell et al., 2001) and risky behaviors (Mmari et al, 2010; Pu et al., 2013) while fostering better mental health (Barney, 2001; Borowsky et al., 1999; Pharris et al., 1997), and resilience (LaFromboise et al, 2006), all of which impact a student's ability to attend school and learn. Anecdotally, we know many of the friendships formed at the RISE Summit continue long after the Summit ends with students remaining in contact with each other and meeting in-person at other events.

Many students reported finding the opportunity to connect with Indigenous cultures and interact with Knowledge Keepers at the RISE Summit as a meaningful experience and gained information and/or skills they would use later in life. Cultural connectedness in Native adolescents has been shown to increase academic success (Whitbeck et al., 2001), foster resilience (LaFromboise et al., 2006), and protect against suicide (Pharris et al., 2013). Similarly, cultural congruence within academic systems has been shown to increase academic achievement in Native students across multiple subject areas (Apthorp, D'Amato, & Richardson, 2002; Keith et al., 2017; Kisker et al., 2012; Stowe, 2017).

Did the State implement any new (newly identified) infrastructure improvement strategies during the reporting period? (yes/no)

NO

Provide a summary of the next steps for each infrastructure improvement strategy and the anticipated outcomes to be attained during the next reporting period.

Redesigning Internal SEA Infrastructure to Support Intra-agency Collaboration and Coordination

Next steps for 2025-26:

Align the SPDG and SSIP with the support of NIRN-SISEP. Continue to develop statewide systems and consistent implementation of MTSS across state agency projects including DPHHS and improve inter-agency coordination of MTSS efforts with specific emphasis on supporting behavior and improving attendance. This will include working with Coordinated School Health Unit and coordination with ESEA/ESSA Title I School Support team because of the high number of American Indian students served in schools identified for Comprehensive Schools support.

OPI/DPHHS/SISEP Partnership Purpose:

- Articulate the vision of Montana's Integrated System of Support (MTSS) of state initiatives and utilize implementation science to create cohesion and alignment to improve graduation and attendance outcomes for Montana youth.

Long Term Goals of the OPI State Management Team working with SISEP:

1. Define an Integrated System of Support framework (MTSS) for Montana, and scale knowledge and resources across the SEA
2. Develop internal SEA Infrastructure that supports intra-agency collaboration and coordination of professional development and coaching for integrated MTSS
3. Establish a data use culture (data literacy) at the SEA and LEA level
4. Braid funding that supports a sustainable, integrated MTSS framework

Goals 2 and 3 are strongly aligned with the activities of the SSIP and goals 1 and 4 support the use of MTSS as an evidence-based framework to support AI students with disabilities.

Collaborate with TSAR and IEFA units, specifically at Indian Education for All Best Practices Conference through a session from OPI Special Education staff planned around English Language Learners and IDEA Identification. This session will also be repeated at OPI Summer Institute.

Continue Special Education staff participation in weekly collaborative meetings: internal SEA collaborative conversation designed to link all division projects focused on American Indian student achievement

Expected outcome: Stronger SEA coordination and supports for districts serving AI students with disabilities to increase district implementation of MTSS and the use of EBPs for improved behavior and academic outcomes including graduation with a regular diploma.

Establish a Data Use Culture at the SEA and LEA levels

Next Steps for 2025-26:

- Training on data literacy, data use, and Data-Based Individualization (DBI) at SEA Summer Institute in June 2026 and CSPD training on data use and data literacy 2025-26.
- Establishing a Data-use culture is connected with the 2025 SPDG emphasis on I-MTSS and DBI which will provide coaching and continued training in data literacy and data-based decision making.
- PowerSchool MTSS discussions at SISEP State Management Team.
- Increasing the capacity of Montana tribal leaders, knowledge keepers, LEA leadership, and students to understand and use data to make informed decisions for American Indian students with disabilities.

Expected outcome: Increase use of data-based decision making to improve outcomes for American Indian students served under IDEA and increased completion and/or graduation rates for this population.

Provide Professional Development and Technical Assistance to implement EBPs

Next steps for 2025-26:

- Continuing to provide training opportunities that develop cultural perspectives of historical Indigenous Restorative Practice efforts at Summer Institute, CSPDs, or other training events hosted by OPI.
- Support districts on or around Montana reservations and those serving high AI populations with MTSS implementation through the SPDG, ESEA/ESSA Title I Comprehensive School Support, and the Comprehensive Literacy Grant.
- Connect AI student serving districts with the DPHHS/University of Montana Early Intervention System (EIS) to screen students for behavioral supports and help match students with EBPs. This work is also part of our SISEP Partnership.
- Supporting SEA Special Education Endorsement candidates through regular meetings on inclusionary practices through a co-teaching lens.
- Continuing to develop the Professional Learning Communities (PLC) and Personalized Learning Networks (PLN) that seek to build and strengthen the capacity of special education teachers to meet the needs of students. These can be both through the CSPD, SPDG, MAEP, and Special Education Endorsement Project candidates support systems.

Expected outcome: Continue to strengthen and build on SEA supports for EBP implemented on behalf of special education-identified American Indian students, along with all special education-identified students, leading to increased behavioral and academic outcomes including graduation for this population.

Promote American Indian Youth and Family Empowerment

Next Steps for 2025-26:

- Indigenous Morning Greetings Project- Through this project, SEA staff will record greetings from American Indian Elders, Knowledge Keepers, and influential leaders from across Montana. These greetings will be recorded with the intent of being played at schools at the beginning and end of the week and will be paired with prompts for reflecting on the messages provided in the greeting.
- SEA strategies related to Indigenous Ways of Knowing- Traditional knowledge and indigenous ways of knowing have contributed to the success and identity of American Indians since time immemorial and can be leveraged within schools and classrooms today, to accomplish the same intent. Incorporating traditional stories and Indigenous ways of knowing into the learning process will provide opportunities for students to connect with their

culture and positive self-identity development; engaging pedagogy and sense-making rooted in Indigenous worldview promotes social, emotional, and relationship skill building. Cultural engagement within the school can promote relationship building between the school and community and promote better mental health and wellness for students and staff.

- Continued regular RISE meetings and RISE Youth event is planned for Spring 2026.
- Continued tribal consultation support at both the SEA and LEA level to fulfill state and federal requirements
- Through collaboration and communication infrastructure efforts, building awareness and the need to empower American Indian students to reconnect to their identity and build pathways to high school completion.
- Strengthen and utilize tribal consultations for district and school leaders to expand engagement efforts to ensure students, families, communities, and tribal councils are invested partners in increasing the completion rates of American Indian students with disabilities.

Expected outcome: Continue to strengthen and build on SEA supports implemented on behalf of SPED-identified American Indian students leading to increased completion and/or graduation rates for this population.

List the selected evidence-based practices implement in the reporting period:

Cultural Congruence and Cultural Integration into Teaching and Learning Practices

Restorative Practices

Multi-Tiered Systems of Support (MTSS)

Positive Behavior Interventions and Supports (PBIS)

Provide a summary of each evidence-based practice.

Cultural Congruence and Cultural Integration into Teaching and Learning Practices

Cultural worldview significantly impacts learning by acting as a lens through which a learner interprets information and makes meaning. Creating more congruence with Indigenous worldviews within academic systems has been shown to increase academic achievement in American Indian (AI) students across multiple subject areas (Apthorp, D'Amato, & Richardson, 2002; Keith et al., 2017; Kisker et al., 2012; Stowe, 2017). When teaching materials and practices incorporate students' cultural knowledge and worldview the time it takes for students to process and recall information is greatly reduced. This reduces the cognitive load necessary for interpretation and creates more time for learning.

Restorative Practices

Restorative Practices are a relational framework for building community, fostering healthy relationships, and proactively managing conflict by repairing harm rather than relying solely on punishment. Originating from indigenous traditions, these strategies emphasize empathy, accountability, and dialogue to restore trust and maintain positive environments in schools and workplaces. Restorative practices (RP) are evidence-based, proactive, and responsive strategies that build community and repair harm, resulting in improved school climate, reduced suspensions, decreased disciplinary disparities, and enhanced social-emotional skills. Studies show significant positive impacts on behavior, including up to 75% reductions in discipline referrals, increased empathy, and better academic outcomes when implemented fully.

Integrated MTSS (I-MTSS)

Integrated Multi-Tiered System of Supports (I-MTSS) is a comprehensive, holistic framework that merges academic, social, emotional, and behavioral supports into one cohesive system to improve outcomes for all students. It aligns data-driven, evidence-based practices with a tiered continuum of supports, ensuring equitable access to personalized, preventative instruction rather than relying solely on traditional academic-only models.

Core Components of Integrated MTSS:

- Comprehensive Support: Integrates academic (reading/math) and Social-Emotional-Behavioral (SEB) supports to address the whole child.
- Tiered Continuum: Implements a three-tiered model: Tier 1 (universal for all), Tier 2 (targeted for some), and Tier 3 (intensive for few).
- Data-Driven Decision Making: Uses universal screening, progress monitoring, and diagnostic data to identify student needs early and match them with appropriate interventions.
- Shared Leadership & Collaboration: Involves teaming, shared responsibility, and consistent professional development to build staff capacity.
- Prevention-Focused: Proactively identifies needs to prevent learning or behavior issues, rather than waiting for failure.

PBIS

Positive Behavioral Interventions and Supports (PBIS) is an evidence-based three-tiered framework to improve and integrate all of the data, systems, and practices affecting student outcomes every day. PBIS Tier 1 practices and systems establish a foundation of regular, proactive support while preventing unwanted behaviors. Schools provide these universal supports to all students, school-wide. PBIS Tier 2 practices and systems support students who are at risk for developing more serious problem behaviors before those behaviors start. These supports help students develop the skills they need to benefit from core programs at the school. At PBIS Tier 3, students receive more intensive, individualized support to improve their behavioral and academic outcomes. At this level, schools rely on formal assessments to determine a student's need.

Provide a summary of how each evidence-based practice and activities or strategies that support its use, is intended to impact the SiMR by changing program/district policies, procedures, and/or practices, teacher/provider practices (e.g., behaviors), parent/caregiver outcomes, and/or child outcomes.

Cultural Congruence and Cultural Integration into Teaching and Learning Practices

Cultural worldview significantly impacts learning by acting as a lens through which a learner interprets information and makes meaning. Creating more congruence with Indigenous worldviews within academic systems has been shown to increase academic achievement in American Indian (AI) students across multiple subject areas (Apthorp, D'Amato, & Richardson, 2002; Keith et al., 2017; Kisker et al., 2012; Stowe, 2017). When teaching materials and practices incorporate students' cultural knowledge and worldview the time it takes for students to process and recall information is greatly reduced. This

reduces the cognitive load necessary for interpretation and creates more time for learning. Both the TSAR and IEFA units work with educators to create more cultural congruence within teaching and learning practices and facilitate embedding Indigenous knowledge within existing educational systems.

Restorative Practices

Restorative practices (RP) are evidence-based, proactive, and responsive strategies that build community and repair harm, resulting in improved school climate, reduced suspensions, decreased disciplinary disparities, and enhanced social-emotional skills. Studies show significant positive impacts on behavior, including up to 75% reductions in discipline referrals, increased empathy, and better academic outcomes when implemented fully.

Evidence-Based Impacts of Restorative Practices in Schools

- Behavioral Improvement: Schools with high-quality implementation experience significantly less fighting, bullying, and chronic misbehavior.
- Reduced Disciplinary Action: Studies have found substantial drops in suspensions and expulsions, sometimes by over 44% in one year.
- Disparity Reduction: Data indicates that well-implemented RP reduces racial disparities in discipline.
- School Climate & Relationships: Research from the Center for Disease Control and International Institute for Restorative Practices shows increased student-staff trust and higher student engagement.

Studies that have looked at the adoption of RP in whole schools, such as those by Bonell et al. (2015), suggest that RP is most effective when it is part of the school culture. Schools must include RP in their coexistence policies to achieve this integration and provide ongoing training for teachers and support staff. Blending restorative practices with Positive Behavioral Interventions and Supports (PBIS) strengthens the overall framework.

I-MTSS

I-MTSS evidence-based practices (EBPs) are research-validated strategies, programs, and interventions implemented with fidelity across a tiered framework to improve academic, behavioral, and social-emotional outcomes. Key components include universal screening, data-based decision-making, progress monitoring, and evidence-backed interventions (e.g., What Works Clearinghouse, PBIS) matched to student needs. Key Evidence-Based Practices by Tier in I-MTSS are outlined below.

- Tier 1 (Universal - All Students): High-quality, evidence-based core instruction; positive behavioral interventions and supports (PBIS); universal screenings.
- Tier 2 (Targeted - Some Students): Small-group instruction, targeted academic interventions (e.g., explicit literacy instruction), and behavioral supports (e.g., Check-In/Check-Out).
- Tier 3 (Intensive - Few Students): Individualized, intensive, and frequent interventions often based on functional behavior assessments (FBA).

PBIS

Funded by the U.S. Department of Education's Office of Special Education Programs (OSEP) and the Office of Elementary and Secondary Education (OESE), the Center on PBIS supports schools, districts, and states to build systems capacity for implementing a multi-tiered approach to social, emotional and behavior support. The broad purpose of PBIS is to improve the effectiveness, efficiency, and equity of schools and other agencies. PBIS improves social, emotional, and academic outcomes for all students, including students with disabilities and students from underrepresented groups.

Describe the data collected to monitor fidelity of implementation and to assess practice change.

Cultural Congruence and Cultural Integration into Teaching and Learning Practices

The data we will collect to monitor fidelity of implementation is the percentage of schools meeting accreditation requirements for implementing Indian Education For All (IEFA). Montana's state constitution and state law requires all public schools to implement IEFA to recognize the distinct and unique cultural heritage of American Indians and be committed in its educational goals to preserve Montana Indian cultural heritages. Every Montanan, whether Indian or non-Indian, should learn about the distinct and unique heritage of American Indians in a culturally responsive manner. During school accreditation cycles, schools must report on their work to implement IEFA. We will track the percentage of schools who are properly meeting their IEFA accreditation requirements.

Restorative Practices

American Indian students are over-represented across all categories of school discipline, especially OSS and expulsion. Tracking yearly discipline rates across the state will assist in assessing success in implementing restorative practices to reduce incidents of exclusionary discipline in American Indian students.

I-MTSS- Our SPDG uses the SISEP District Capacity Assessment to measure implementation of MTSS District systems and a MTSS Implementation Stages Checklist to measure building level implementation. OPI Summer Institute 2025 included training on the Integrated MTSS Fidelity Rubric, (IMFR) created by AIR, but we have not yet begun measuring implementation using this fidelity tool as it is still new.

PBIS- PBIS Tiered Fidelity Inventory is implemented as a fidelity measure in 15 SPDG Districts, including one that serves a high percentage of American Indian students.

Describe any additional data (e.g., progress monitoring) that was collected that supports the decision to continue the ongoing use of each evidence-based practice.

Within our SPDG I-MTSS framework, our districts utilize benchmark testing three times a year and regular progress monitoring for reading and math instruction. We also receive regular feedback on the implementation of the framework from grant sites and annual data around implementation growth.

We collect evaluation feedback following all professional development and use this data to select future training session topics and presenters.

Data is regularly collected on American Indian Achievement and survey data from the RISE group and summit supports the continued use of cultural congruence and cultural integration strategies.

Provide a summary of the next steps for each evidence-based practice and the anticipated outcomes to be attained during the next reporting period.

During the next reporting period, July 1, 2025 - June 30, 2026, in addition to the items reported above related to the infrastructure activities, the SEA plans these next steps:

1. I-MTSS and PBIS: As an intensive state, our SEA will continue to work with National Implementation Research Network (NIRN): State Implementation and Scaling-up of Evidence-based Practices (SISEP) to align the activities of the SSIP with our new 2025 State Personnel Development Grant (SPDG) Montana's Integrated Tiered System of Support (I-MTSS) and Para Pathways Project. Based on the recommendations of the advisory panel and joint partnership meeting discussion, we will be exploring additional evidence-based practices we can implement with an emphasis on behavior strategies, improving attendance, reducing exclusionary discipline, and continuing to improve graduation rates of American Indian students with disabilities, as well as impact students with disabilities statewide. As we focus on behavior, our NIRN/SISEP work will also include additional internal collaboration with the Coordinated School Health Unit (CSH) and ESEA/ESSA Title I School Support. Through the Regional CSPDs, Summer Institute, and the Montana Autism Education project the SEA is offering training in EBPs to address behavioral concerns, including training on functions of behavior and setting up behavior support plans as well as using EBPs to get ahead of behavior (antecedent intervention). Outcomes will include training data on number of staff trained in EBPs related to behavior.

2. Cultural Congruence and Cultural Integration into Teaching and Learning Practices

During the next reporting period, TSAR will create tools and guidance documents to assist schools with embedding cultural knowledge and practices within their teaching and learning practices. More specifically, TSAR will release a series of one-pagers dedicated to assisting schools with implementing Indigenous whole learning approaches. TSAR will also release a walk-through checklist, designed to provide opportunities for schools to identify current strengths in integrating culture into schools and classrooms, and areas for exploration. The goal of this work is to provide actionable steps and guidance for schools to put ideas into action. We predict this will increase American Indian student attendance and academic engagement.

3. Restorative Practices Guide

In 2025-26, the OPI will publish the Restorative Practices: Creating a Culture of Connection guide which serves as both an informational manual and planning workbook for implementing restorative practices in schools. As educators work through each section of the guide, they also take steps to begin to outline high priority needs and potential strategies for implementing restorative practices. Through this work, more schools will begin implementing restorative practices across the MTSS framework which will increase connectedness to school, reduce disciplinary issues, including reducing incidences of exclusionary discipline.

Does the State intend to continue implementing the SSIP without modifications? (yes/no)

NO

If no, describe any changes to the activities, strategies or timelines described in the previous submission and include a rationale or justification for the changes.

Our current SSIP was developed in 2020, so we will be reviewing it in 2025-26 to update the Theory of Action, to continue to improve alignment with the SPDG who will be targeting efforts to recruit more tribal connected schools, and to update the evaluation plan.

Section C: Stakeholder Engagement

Description of Stakeholder Input

The Special Education Advisory Panel (SEAP) in Montana has been in existence since 2013. The SEAP is made up of 16 members, seven of whom are parents of students with disabilities. The panel is fully vested and broadly representative of Montana. Many of the panel members serve in other agency or organization leadership positions or on advisory councils as the voice of students with disabilities. This enables the SEA to draw insight and advice from a diverse group of stakeholders with an understanding of Montana's unique needs and strengths.

In the 2024-25 and 2025-26 school years, the SEA asked for input on Indicators 3, 4, 9, and 10 from the SEAP. The SEA presented information on the SPP/APR as a whole and then dug into the specific indicators for feedback on targets and proposed methodological changes. The SEAP agreed with the SEA's proposal. Meeting minutes from discussions with SEAP as well as presentation materials have been posted publicly for all stakeholder review and input on the state website for SEAP: <https://opi.mt.gov/Educators/School-Climate-Student-Wellness/Special-Education/Regulations-and-Guidance#10965413037-federal-requirements>.

In the spring of every school year, the SEA brings together parents, Montana's Parent Training and Information center the Montana Empowerment Center (MEC), the SEAP, and other state agencies for a joint partnership meeting. During this meeting the SEA reviews the APR submitted in February. The SEA asks for suggestions on how to potentially improve the outcomes of the indicators along with doing a data drill down of the state data and district level data.

In addition to the above-mentioned stakeholders, the SEA worked with many other stakeholder groups that support students with disabilities. Those groups include but are not limited to:

Monthly Special Education Director's calls

Montana Council for Exceptional Children (MCEC) – presented on updates at the SEA, national level, and writing compliant special education paperwork
Vocational Rehabilitation and Blind Services – strengthening our secondary transition

Summer Institute

Montana Council of Administrators of Special Education (MCASE)

Higher Education Consortium (HEC)

Dawson Community College – assisted in setting up level 2 of the ParaPathways Program

CSPD Regional Directors

Montana Empowerment Center – Monthly meetings

Disability Rights Montana

Describe the specific strategies implemented to engage stakeholders in key improvement efforts.

American Indian Student Achievement data was presented to the Legislative Interim Committee in September 2024. That Report https://opi.mt.gov/Portals/182/Page%20Files/Indian%20Education/Indian%20Student%20Achievement/Docs/Data_Report_2024.pdf

The Montana Advisory Council on Indian Education was established by the Board of Public Education and the Office of Public Instruction to function in an advisory capacity for the education of American Indian students in Montana. MACIE meets quarterly to discuss AI student achievement and the OPI representative on the MACIE reports back to OPI team during tribal check-ins noted above. The Montana Advisory Council on Indian Education shall be a strong voice for collaborative efforts among tribal, state, and federal organizations, institutions, groups, and agencies for the express purpose of promoting high quality and equitable educational opportunities for all American Indian students in Montana. This includes, but is not limited to, culture, language, and Indian Education for All. <https://opi.mt.gov/Educators/Teaching-Learning/Indian-Education-for-All/MACIE#10967112882-meetings>

Our RISE group is made up of educators and youth representatives who meet monthly to discuss issues pertinent to AI students.

A presentation of all indicators, including Indicator 17 SSIP was presented to the stakeholders during our Joint Stakeholders meeting in April of 2024. The SEA showed past indicator results and compared them to current results. Once the information was shared, the stakeholders broke into small table discussions. They were tasked with reviewing all the data again, asked to discuss the data provided, and as a group write down one to two areas of improvement the SEA could work on. As a facilitator, TAESE gathered all information and provided it back to the State Special Education Director in a summary.

Indicator 17 was reviewed by Special Education Leadership in August 2024 and NCSI and based on the continued number of American Indian students with disabilities served under IDEA, the team felt the SIMR should still be a priority and that we align the SSIP and the SPDG as much as possible.

Were there any concerns expressed by stakeholders during engagement activities? (yes/no)

YES

Describe how the State addressed the concerns expressed by stakeholders.

At the Spring 2024 and Spring 2025 Joint Partnership meetings, stakeholders expressed concerns around student behavior, exclusionary discipline, and attendance. Discussions at the State Special Education Advisory Panel in 2024-25 also show continued concerns over student behavior and disciplinary practices for students with disabilities. The SEA has entered a partnership with NIRN/SISEP as an Intensive state to develop and implement additional strategies to address student behavior, attendance, and exclusionary discipline policies through alignment of the SSIP and SPDG. NIRN/SISEP is helping us consider how the work of the SPDG's evidence-based MTSS framework, which includes an integrated model of RTI and PBIS, can be further scaled to tribal schools, as well as determine if there are other evidence-based strategies that could be implemented under the SSIP. Through the Regional CSPDs, High School Forum, Summer Institute, and the Montana Autism Education project the SEA is offering training in EBPs to address behavioral concerns, including training on functions of behavior and setting up behavior support plans as well as using EBPs to get ahead of behavior (antecedent intervention).

Additional Implementation Activities

List any activities not already described that the State intends to implement in the next fiscal year that are related to the SiMR.

N/A

Provide a timeline, anticipated data collection and measures, and expected outcomes for these activities that are related to the SiMR.

N/A

Describe any newly identified barriers and include steps to address these barriers.

N/A

Provide additional information about this indicator (optional).

N/A

17 - Prior FFY Required Actions

None

17 - OSEP Response

17 - Required Actions

Indicator 18: General Supervision

Instructions and Measurement

Monitoring Priority: General Supervision

Compliance indicator: This SPP/APR indicator focuses on the State's exercise of its general supervision responsibility to monitor its local educational agencies (LEAs) for requirements under Part B of the Individuals with Disabilities Education Act (IDEA) through the State's reporting on timely correction of noncompliance (20 U.S.C. 1412(a)(11) and 1416(a); and 34 C.F.R. §§ 300.149, 300.600). In reporting on findings under this indicator, the State must include findings from data collected through all components of the State's general supervision system that are used to identify noncompliance. This includes, but is not limited to, information collected through State monitoring, State database/data system, dispute resolution, and fiscal management systems as well as other mechanisms through which noncompliance is identified by the State.

Data Source

The State must include findings from data collected through all components of the State's general supervision system that are used to identify noncompliance. This includes, but is not limited to, information collected through State monitoring, State database/data system, dispute resolution, and fiscal management systems as well as other mechanisms through which noncompliance is identified by the State. Provide the actual numbers used in the calculation. Include all findings of noncompliance regardless of the specific type and extent of noncompliance.

Measurement

This SPP/APR indicator requires the reporting on the percent of findings of noncompliance corrected within one year of identification:

- # of findings of noncompliance issued the prior Federal fiscal year (FFY) (e.g., for the FFY 2024 submission, use FFY 2023, July 1, 2023 – June 30, 2024)
- # of findings of noncompliance the State verified were corrected no later than one year after the State's written notification of findings of noncompliance.

Percent = [(b) divided by (a)] times 100

Instructions

Targets must be 100%.

States are required to complete the General Supervision Data Table within the online reporting tool.

Report in Column A, the number of findings of noncompliance made in FFY 2023 (July 1, 2023 – June 30, 2024), as reported in the compliance indicator, and report in Column C1, the number of those findings which were timely corrected, as soon as possible and in no case later than one year after the State's written notification of noncompliance. Report in Column B, the number of additional findings of noncompliance related to the compliance indicator made in FFY 2023 (July 1, 2023–June 30, 2024) and report in Column C2, the number of those additional findings related to the compliance indicator which were timely corrected, as soon as possible and in no case later than one year after the State's written notification of noncompliance.

States may also provide additional information related to other findings of noncompliance that are not specific to the compliance indicators. This row would include reporting on all other findings of noncompliance that were not reported by the State under the compliance indicators listed below (e.g., Results indicators (including related requirements), Fiscal, Dispute Resolution, etc.). In future years (e.g., with the FFY 2026 SPP/APR), States may be required to further disaggregate findings by results indicators (1, 2, 3, 4A, 5, 6, 7, 8, 14, 15, 16, and 17), fiscal and other areas.

Provide detailed information about the timely correction of child-specific and regulatory/systemic noncompliance as noted in OSEP's response for the previous SPP/APR. If the State did not ensure timely correction of the previous findings of noncompliance, provide information on the extent to which noncompliance was subsequently corrected (more than one year after identification). In addition, provide information regarding the nature of any continuing noncompliance and the actions that have been taken or will be taken, to ensure the subsequent correction of the outstanding noncompliance, to address areas in need of improvement, and any sanctions or enforcement actions used, as necessary and consistent with IDEA's enforcement provisions, the OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), and State rules.

18 - Indicator Data

Historical Data

Baseline Year	Baseline Data
2023	85.71%

FFY	2019	2020	2021	2022	2023
Target	100%	100%	100%	100%	100%
Data					85.71%

Targets

FFY	2024	2025
Target	100%	100%

Indicator 4B. Percent of LEAs that have: (a) a significant discrepancy, as defined by the State, by race or ethnicity, in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs; and (b) policies, procedures or practices that contribute to the significant discrepancy, as defined by the State, and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards. (20 U.S.C. 1416(a)(3)(A); 1412(a)(22))

Findings of Noncompliance Identified in FFY 2023

Column A: # of written findings of noncompliance identified in FFY 2023 (7/1/23 – 6/30/24)	Column B: # of any other written findings of noncompliance identified in FFY 2023 not reported in Column A (e.g., those issued based on other IDEA requirements), if applicable	Column C1: # of written findings of noncompliance from Column A that were timely corrected (i.e., verified as corrected no later than one year from identification)	Column C2: # of written findings of noncompliance from Column B that were timely corrected (i.e., verified as corrected no later than one year from identification)	Column D: # of written findings of noncompliance from Columns A and B for which correction was not completed or timely corrected
0	0	0	0	0

Please explain the source (e.g., State monitoring, State database/data system, dispute resolution, fiscal, related requirements, etc.) of any additional findings reported in Column B.

No additional findings were reported for Indicator 4B for FFY 2023.

Please describe, consistent with OSEP QA 23-01, how the State verified that the source of noncompliance is correctly implementing the regulatory requirements based on *updated data*:

No additional findings were reported for Indicator 4B and no findings were issued for Indicator 4B in FFY 2023.

Please describe, consistent with OSEP QA 23-01, how the State verified that each *individual case* of noncompliance was corrected:

No additional findings were reported for Indicator 4B and no findings were issued for Indicator 4B in FFY 2023.

Indicator 9. Percent of districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification. (20 U.S.C. 1416(a)(3)(C))

Findings of Noncompliance Identified in FFY 2023

Column A: # of written findings of noncompliance identified in FFY 2023 (7/1/23 – 6/30/24)	Column B: # of any other written findings of noncompliance identified in FFY 2023 not reported in Column A (e.g., those issued based on other IDEA requirements), if applicable	Column C1: # of written findings of noncompliance from Column A that were timely corrected (i.e., verified as corrected no later than one year from identification)	Column C2: # of written findings of noncompliance from Column B that were timely corrected (i.e., verified as corrected no later than one year from identification)	Column D: # of written findings of noncompliance from Columns A and B for which correction was not completed or timely corrected
0	0	0	0	0

Please explain the source (e.g., State monitoring, State database/data system, dispute resolution, fiscal, related requirements, etc.) of any additional findings reported in Column B.

No additional findings were reported for Indicator 9 for FFY 2023.

Please describe, consistent with OSEP QA 23-01, how the State verified that the source of noncompliance is correctly implementing the regulatory requirements based on *updated data*:

No additional findings were reported for Indicator 9 and no findings were issued for Indicator 9 in FFY 2023.

Please describe, consistent with OSEP QA 23-01, how the State verified that each *individual case* of noncompliance was corrected:

No additional findings were reported for Indicator 9 and no findings were issued for Indicator 9 in FFY 2023.

Indicator 10. Percent of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification. (20 U.S.C. 1416(a)(3)(C))

Findings of Noncompliance Identified in FFY 2023

Column A: # of written findings of noncompliance identified in FFY 2023 (7/1/23 – 6/30/24)	Column B: # of any other written findings of noncompliance identified in FFY 2023 not reported in Column A (e.g., those issued based on other IDEA requirements), if applicable	Column C1: # of written findings of noncompliance from Column A that were timely corrected (i.e., verified as corrected no later than one year from identification)	Column C2: # of written findings of noncompliance from Column B that were timely corrected (i.e., verified as corrected no later than one year from identification)	Column D: # of written findings of noncompliance from Columns A and B for which correction was not completed or timely corrected
0	0	0	0	0

Please explain the source (e.g., State monitoring, State database/data system, dispute resolution, fiscal, related requirements, etc.) of any additional findings reported in Column B.

No additional findings were reported for Indicator 10 for FFY 2023.

Please describe, consistent with OSEP QA 23-01, how the State verified that the source of noncompliance is correctly implementing the regulatory requirements based on *updated data*:

No additional findings were reported for Indicator 10 and no findings were issued for Indicator 10 in FFY 2023.

Please describe, consistent with OSEP QA 23-01, how the State verified that each *individual case* of noncompliance was corrected:

No additional findings were reported for Indicator 10 and no findings were issued for Indicator 10 in FFY 2023.

Indicator 11. Percent of children who were evaluated within 60 days of receiving parental consent for initial evaluation or, if the State establishes a timeframe within which the evaluation must be conducted, within that timeframe. (20 U.S.C. 1416(a)(3)(B))

Findings of Noncompliance Identified in FFY 2023

Column A: # of written findings of noncompliance identified in FFY 2023 (7/1/23 – 6/30/24)	Column B: # of any other written findings of noncompliance identified in FFY 2023 not reported in Column A (e.g., those issued based on other IDEA requirements), if applicable	Column C1: # of written findings of noncompliance from Column A that were timely corrected (i.e., verified as corrected no later than one year from identification)	Column C2: # of written findings of noncompliance from Column B that were timely corrected (i.e., verified as corrected no later than one year from identification)	Column D: # of written findings of noncompliance from Columns A and B for which correction was not completed or timely corrected
0	0	0	0	0

Please explain the source (e.g., State monitoring, State database/data system, dispute resolution, fiscal, related requirements, etc.) of any additional findings reported in Column B.

No additional findings were reported for Indicator 11 for FFY 2023.

Please describe, consistent with OSEP QA 23-01, how the State verified that the source of noncompliance is correctly implementing the regulatory requirements based on *updated data*:

No additional findings were reported for Indicator 11 and no findings were issued for Indicator 11 in FFY 2023.

Please describe, consistent with OSEP QA 23-01, how the State verified that each *individual case* of noncompliance was corrected:

No additional findings were reported for Indicator 11 and no findings were issued for Indicator 11 in FFY 2023.

Indicator 12. Percent of children referred by Part C prior to age 3, who are found eligible for Part B, and who have an IEP developed and implemented by their third birthdays. (20 U.S.C. 1416(a)(3)(B))

Findings of Noncompliance Identified in FFY 2023

Column A: # of written findings of noncompliance identified in FFY 2023 (7/1/23 – 6/30/24)	Column B: # of any other written findings of noncompliance identified in FFY 2023 not reported in Column A (e.g., those issued based on other IDEA requirements), if applicable	Column C1: # of written findings of noncompliance from Column A that were timely corrected (i.e., verified as corrected no later than one year from identification)	Column C2: # of written findings of noncompliance from Column B that were timely corrected (i.e., verified as corrected no later than one year from identification)	Column D: # of written findings of noncompliance from Columns A and B for which correction was not completed or timely corrected
22	0	22	0	0

Please explain the source (e.g., State monitoring, State database/data system, dispute resolution, fiscal, related requirements, etc.) of any additional findings reported in Column B.

No additional findings were reported for Indicator 12 for FFY 2023.

Please describe, consistent with OSEP QA 23-01, how the State verified that the source of noncompliance is correctly implementing the regulatory requirements based on *updated data*:

The findings reported in Column A are the same as those reported for Indicator 12. In FFY 2023, there were 22 LEAs that were the source of noncompliance for the 47 individual records with noncompliance. The state issued written findings and required the 22 LEAs to complete a corrective action plan (CAP) that required the LEAs to drill down into and take steps to correct the root cause of the noncompliance to prevent it from recurring. After completion of the CAP and correction of the child-specific noncompliance, the state conducted a subsequent data review of new student records to evaluate compliance with regulatory requirements. Through these activities, the state verified that the 22 LEAs that were the source of noncompliance are now correctly implementing the regulatory requirements with 100% compliance, consistent with QA 23-01.

Please describe, consistent with OSEP QA 23-01, how the State verified that each *individual case* of noncompliance was corrected:

The findings reported in Column A are the same as those reported for Indicator 12. The 47 individual cases of noncompliance reported in FFY 2023 were required to be corrected, albeit past the child's third birthday, to ensure an eligibility determination was made and, when eligible, an IEP was developed and implemented. LEAs with the 47 cases of noncompliance were required to submit evidence of such actions and the state verified that each of the 47 individual cases of noncompliance were corrected, consistent with QA 23-01.

Indicator 13. Percent of youth with IEPs aged 16 and above with an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon an age-appropriate transition assessment, transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student's transition services and needs. There also must be evidence that the student was invited to the IEP Team meeting where transition services are to be discussed and evidence that a representative of any participating agency was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority. (20 U.S.C. 1416(a)(3)(B))

Findings of Noncompliance Identified in FFY 2023

Column A: # of written findings of noncompliance identified in FFY 2023 (7/1/23 – 6/30/24)	Column B: # of any other written findings of noncompliance identified in FFY 2023 not reported in Column A (e.g., those issued based on other IDEA requirements), if applicable	Column C1: # of written findings of noncompliance from Column A that were timely corrected (i.e., verified as corrected no later than one year from identification)	Column C2: # of written findings of noncompliance from Column B that were timely corrected (i.e., verified as corrected no later than one year from identification)	Column D: # of written findings of noncompliance from Columns A and B for which correction was not completed or timely corrected
7	0	7	0	0

Please explain the source (e.g., State monitoring, State database/data system, dispute resolution, fiscal, related requirements, etc.) of any additional findings reported in Column B.

No additional findings were reported for Indicator 13 for FFY 2023.

Please describe, consistent with OSEP QA 23-01, how the State verified that the source of noncompliance is correctly implementing the regulatory requirements based on *updated data*:

The findings reported in Column A are the same as those reported for Indicator 13. In FFY 2023, there were 7 LEAs that were the source of noncompliance for the 27 individual records with noncompliance. The state issued written findings and required the 7 LEAs to complete a corrective action plan (CAP) that required the LEAs to drill down into and take steps to correct the root cause of the noncompliance in order to prevent it from recurring. After completion of the CAP and correction of the child-specific noncompliance, the state conducted a subsequent data review of new student records to evaluate compliance with regulatory requirements. Through these activities, the state verified that the 7 LEAs that were the source of noncompliance are now correctly implementing the regulatory requirements with 100% compliance, consistent with QA 23-01.

Please describe, consistent with OSEP QA 23-01, how the State verified that each *individual case* of noncompliance was corrected:

The findings reported in Column A are the same as those reported for Indicator 13. The 27 individual cases of noncompliance reported in FFY 2023 were required to be corrected to ensure that a robust, compliant transition plan capturing all required components was in place. LEAs with the 27 cases of noncompliance were required to submit evidence of the corrected transition plans and the state verified that each of the 27 individual cases of noncompliance were corrected, consistent with QA 23-01.

Optional for FFY 2024 and 2025:

Other Areas - All other findings: States may report here on all other findings of noncompliance that were not reported under the compliance indicators listed above (e.g., Results indicators (including related requirements), Fiscal, Dispute Resolution, etc.).

Column B: # of written findings of noncompliance identified in FFY 2023 (7/1/23 – 6/30/24)	Column C2: # of written findings of noncompliance from Column B that were timely corrected (i.e., verified as corrected no later than one year from identification)	Column D: # of written findings of noncompliance from Column B for which correction was not completed or timely corrected
0	0	0

Please explain the source (e.g., State monitoring, State database/data system, dispute resolution, fiscal, related requirements, etc.) of any findings reported in this section:

N/A

Please describe, consistent with OSEP QA 23-01, how the State verified that the source of noncompliance is correctly implementing the regulatory requirements based on *updated data*:

N/A

Please describe, consistent with OSEP QA 23-01, how the State verified that each *individual case* of noncompliance was corrected:

N/A

Total for All Noncompliance Identified (Indicators 4B, 9, 10, 11, 12, 13, and Optional Areas):

Column A: # of written findings of noncompliance identified in FFY 2023 (7/1/23 – 6/30/24)	Column B: # of any other written findings of noncompliance identified in FFY 2023 not reported in Column A (e.g., those issued based on other IDEA requirements), if applicable	Column C1: # of written findings of noncompliance from Column A that were timely corrected (i.e., verified as corrected no later than one year from identification)	Column C2: # of written findings of noncompliance from Column B that were timely corrected (i.e., verified as corrected no later than one year from identification)	Column D: # of written findings of noncompliance from Columns A and B for which correction was not completed or timely corrected
29	0	29	0	0

FFY 2024 SPP/APR Data

Number of findings of Noncompliance that were timely corrected	Number of findings of Noncompliance that were identified FFY 2023	FFY 2023 Data	FFY 2024 Target	FFY 2024 Data	Status	Slippage
29	29	85.71%	100%	100.00%	Met target	No Slippage

Percent of findings of noncompliance not corrected or not verified as corrected within one year of identification	0.00%
---	-------

Provide additional information about this indicator (optional)

N/A

Summary of Findings of Noncompliance identified in FFY 2023 Corrected in FFY 2024 (corrected within one year from identification of the noncompliance):

1. Number of findings of noncompliance the State identified during FFY 2023 (the period from July 1, 2023 through June 30, 2024)	29
2. Number of findings the State verified as timely corrected (corrected within one year from the date of written notification to the LEA of the finding)	29
3. Number of findings <u>not</u> verified as corrected within one year	0

Subsequent Correction: Summary of All Outstanding Findings of Noncompliance Identified in FFY 2023 Not Timely Corrected in FFY 2024 (corrected more than one year from identification of the noncompliance):

4. Number of findings of noncompliance not timely corrected	0
5. Number of findings in Col. A the State has verified as corrected beyond the one-year timeline for Indicator 4B, 9, 10, 11, 12, 13 ("subsequent correction")	0
6a. Number of additional written findings of noncompliance (Col. B) the state has verified as corrected beyond the one-year timeline ("subsequent correction") - Indicator 4B	0
6b. Number of additional written findings of noncompliance (Col. B) the state has verified as corrected beyond the one-year timeline ("subsequent correction") - Indicator 9	0
6c. Number of additional written findings of noncompliance (Col. B) the state has verified as corrected beyond the one-year timeline ("subsequent correction") - Indicator 10	0
6d. Number of additional written findings of noncompliance (Col. B) the state has verified as corrected beyond the one-year timeline ("subsequent correction") - Indicator 11	0
6e. Number of additional written findings of noncompliance (Col. B) the state has verified as corrected beyond the one-year timeline ("subsequent correction") - Indicator 12	0
6f. Number of additional written findings of noncompliance (Col. B) the state has verified as corrected beyond the one-year timeline ("subsequent correction") - Indicator 13	0
6g. (optional) Number of written findings of noncompliance (Col. B) the state has verified as corrected beyond the one-year timeline ("subsequent correction") - All other findings	0
7. Number of findings <u>not</u> yet verified as corrected	0

Subsequent correction: If the State did not ensure timely correction of previous findings of noncompliance, provide information on the nature of any continuing noncompliance and the actions that have been taken, or will be taken, to ensure the subsequent correction of the outstanding noncompliance, to address areas in need of improvement, and any sanctions or enforcement actions used, as necessary and consistent with IDEA's enforcement provisions, the OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), and State rules.

N/A

Correction of Findings of Noncompliance Identified Prior to FFY 2023

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2023 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected
FFY 2022	3	0	3

Year Findings of Noncompliance Were Identified	Findings of Noncompliance Not Yet Verified as Corrected as of FFY 2023 APR	Findings of Noncompliance Verified as Corrected	Findings Not Yet Verified as Corrected

FFY 2022

Findings of Noncompliance Not Yet Verified as Corrected

Actions taken if noncompliance not corrected

The same LEA is the source of the three findings of noncompliance reported in FFY 2022. This LEA has systemic staffing issues that have resulted in substantial staff turnover and special educator positions remaining vacant for extensive periods of time with no evaluation specialist to support work related to identification of children as children with disabilities. To address the extensive issues, the state has required the LEA to hire a state-appointed special education specialist to provide services to students with disabilities and ensure compliance with the completion of eligibilities and IEPs. Further, the state has conducted and continues to conduct regularly scheduled on-site visits with the LEA. These visits are conducted by both the state office of special education staff as well as the school improvement staff to provide more intensive support from a broad cadre of offices. The state superintendent also participated in a site visit to the LEA in the 2023-24 school year.

The state is requiring the LEA to undergo intensive monitoring in the FFY 2024 reporting period and is currently considering escalating sanctions to address long-standing noncompliance. Considerations have included issuing fiscal stipulations or withholding of IDEA funds until the LEA has been brought into compliance. However, the state is trying to reconcile the impact of the loss of IDEA funds on the students in the LEA and their services.

18 - Prior FFY Required Actions

The State must demonstrate, in the FFY 2024 SPP/APR, that the remaining three uncorrected findings of noncompliance identified in FFY 2022 were corrected. When reporting on the correction of noncompliance, the State must report, in the FFY 2024 SPP/APR, that it has verified that each LEA with findings of noncompliance identified in FFY 2023 and each LEA with remaining noncompliance identified in FFY 2022: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the LEA, consistent with OSEP QA 23-01. In the FFY 2024 SPP/APR, the State must describe the specific actions that were taken to verify the correction.

Response to actions required in FFY 2023 SPP/APR

The state has been unable to verify that the LEA that is the source of three findings of noncompliance in FFY 2023 is correctly implementing regulatory requirements consistent with QA 23-01. The three findings for the LEA were identified through other monitoring processes, including state monitoring and file reviews. One finding was related to Indicator 9 and two findings were related to Indicator 11. For all three findings of noncompliance, the LEA has failed to complete required actions outlined in the state-developed corrective action plan, which the state has required the LEA to complete prior to pulling updated data to evaluate implementation of regulatory requirements. As of the FFY 2024 submission, the LEA that is the source of noncompliance for three findings in FFY 2023 is not correctly implementing regulatory requirements, consistent with QA 23-01.

The three individual cases of noncompliance (one case for Indicator 9 and two cases for Indicator 11) were identified as part of the state's monitoring of the LEA that is the source of the findings of noncompliance. To correct the individual cases of noncompliance, the state contracted with a state certified special educator to bring all noncompliant records into compliance and required the LEA to submit evidence of these corrected individual records. The state reviewed LEA-submitted evidence and verified that the individual cases of noncompliance were corrected, consistent with QA 23-01, within one year of written notification of noncompliance.

18 - OSEP Response

18 - Required Actions

The State must demonstrate, in the FFY 2025 SPP/APR, that the remaining three (3) uncorrected findings identified in FFY 2022 were corrected. When reporting on the correction of noncompliance, the State must report, in the FFY 2025 SPP/APR, that it has verified that each LEA with findings of noncompliance identified in FFY 2024 and that each LEA with remaining noncompliance identified in FFY 2022: (1) is correctly implementing the specific regulatory requirements (i.e., achieved 100% compliance) based on a review of updated data such as data subsequently collected through on-site monitoring or a State data system; and (2) has corrected each individual case of noncompliance, unless the child is no longer within the jurisdiction of the LEA, consistent with OSEP QA 23-01. In the FFY 2025 SPP/APR, the State must describe the specific actions that were taken to verify the correction.

Certification

Instructions

Choose the appropriate selection and complete all the certification information fields. Then click the "Submit" button to submit your APR.

Certify

I certify that I am the Chief State School Officer of the State, or his or her designee, and that the State's submission of its IDEA Part B State Performance Plan/Annual Performance Report is accurate.

Select the certifier's role

Designated by the Chief State School Officer to certify

Name and title of the individual certifying the accuracy of the State's submission of its IDEA Part B State Performance Plan/Annual Performance Report.

Name:

Patrick Cates

Title:

Montana State Special Education Director

Email:

patrick.cates@mt.gov

Phone:

406-594-9993

Submitted on:

04/23/26 4:08:54 PM

Determination Enclosures

RDA Matrix

Montana 2026 Part B Results-Driven Accountability Matrix

Results-Driven Accountability Percentage and Determination (1)

Percentage (%)	Determination
62.50%	Needs Assistance

Results and Compliance Overall Scoring

Section	Total Points Available	Points Earned	Score (%)
Results	20	11	55.00%
Compliance	20	14	70.00%

(1) For a detailed explanation of how the Compliance Score, Results Score, and the Results-Driven Accountability Percentage and Determination were calculated, review "How the Department Made Determinations under Section 616(d) of the Individuals with Disabilities Education Act in 2026: Part B."

2026 Part B Results Matrix

Reading Assessment Elements

Reading Assessment Elements	Grade	Performance (%)	Score
Percentage of Children with Disabilities Participating in Statewide Assessment (2)	Grade 4	Not Valid and Reliable	0
Percentage of Children with Disabilities Participating in Statewide Assessment	Grade 8	Not Valid and Reliable	0
Percentage of Children with Disabilities Scoring at Basic or Above on the National Assessment of Educational Progress	Grade 4	27%	2
Percentage of Children with Disabilities Included in Testing on the National Assessment of Educational Progress	Grade 4	93%	1
Percentage of Children with Disabilities Scoring at Basic or Above on the National Assessment of Educational Progress	Grade 8	28%	1
Percentage of Children with Disabilities Included in Testing on the National Assessment of Educational Progress	Grade 8	91%	1

Math Assessment Elements

Math Assessment Elements	Grade	Performance (%)	Score
Percentage of Children with Disabilities Participating in Statewide Assessment	Grade 4	Not Valid and Reliable	0
Percentage of Children with Disabilities Participating in Statewide Assessment	Grade 8	Not Valid and Reliable	0
Percentage of Children with Disabilities Scoring at Basic or Above on the National Assessment of Educational Progress	Grade 4	47%	2
Percentage of Children with Disabilities Included in Testing on the National Assessment of Educational Progress	Grade 4	94%	1
Percentage of Children with Disabilities Scoring at Basic or Above on the National Assessment of Educational Progress	Grade 8	26%	2
Percentage of Children with Disabilities Included in Testing on the National Assessment of Educational Progress	Grade 8	91%	1

(2) Statewide assessments include the regular assessment and the alternate assessment.

Exiting Data Elements

Exiting Data Elements	Performance (%)	Score
Percentage of Children with Disabilities who Dropped Out	26	0
Percentage of Children with Disabilities who Graduated with a Regular High School Diploma*	68	0

*When providing exiting data under section 618 of the IDEA, States are required to report on the number of students with disabilities who exited an educational program through receipt of a regular high school diploma. These students meet the same standards for graduation as those for students without disabilities. As explained in 34 C.F.R. § 300.102(a)(3)(iv), in effect June 30, 2017, "the term regular high school diploma means the standard high school diploma awarded to the preponderance of students in the State that is fully aligned with State standards, or a higher diploma, except that a regular high school diploma shall not be aligned to the alternate academic achievement standards described in section 1111(b)(1)(E) of the ESEA. A regular high school diploma does not include a recognized equivalent of a diploma, such as a general equivalency diploma, certificate of completion, certificate of attendance, or similar lesser credential."

2026 Part B Compliance Matrix

Part B Compliance Indicator (3)	Performance (%)	Full Correction of Findings of Noncompliance Identified in FFY 2023 (4)	Score
Indicator 4B: Significant discrepancy, by race and ethnicity, in the rate of suspension and expulsion, and policies, procedures or practices that contribute to the significant discrepancy and do not comply with specified requirements.	0.00%	N/A	2
Indicator 9: Disproportionate representation of racial and ethnic groups in special education and related services due to inappropriate identification.	0.00%	N/A	2
Indicator 10: Disproportionate representation of racial and ethnic groups in specific disability categories due to inappropriate identification.	0.00%	N/A	2
Indicator 11: Timely initial evaluation	100.00%	N/A	2
Indicator 12: IEP developed and implemented by third birthday	55.66%	YES	0
Indicator 13: Secondary transition	48.98%	YES	0
Indicator 18: General Supervision	100	N/A	2
Timely and Accurate State-Reported Data	89.68%		1
Timely State Complaint Decisions	100.00%		2
Timely Due Process Hearing Decisions	N/A		N/A
Longstanding Noncompliance			1
Programmatic Specific Conditions	None		
Uncorrected identified noncompliance	Yes, 2 to 4 years		

(3) The complete language for each indicator is located in the Part B SPP/APR Indicator Measurement Table at:

<https://sites.ed.gov/idea/files/FFY2024-Part-B-SPP-APR-Reformatted-Measurement-Table.pdf>

(4) This column reflects full correction, which is factored into the scoring only when the compliance data are $\geq 5\%$ and $< 10\%$ for Indicators 4B, 9, and 10, and $\geq 90\%$ and $< 95\%$ for Indicators 11, 12, 13 and 18.

Data Rubric

Montana

FFY 2024 APR (1)

Part B Timely and Accurate Data -- SPP/APR Data

APR Indicator	Valid and Reliable	Total
1	1	1
2	1	1
3A	0	0
3B	0	0
3C	1	1
3D	0	0
4A	1	1
4B	1	1
5	1	1
6	1	1
7	1	1
8	1	1
9	1	1
10	1	1
11	1	1
12	1	1
13	1	1
14	1	1
15	1	1
16	1	1
17	1	1
18	1	1

APR Score Calculation

Subtotal	19
Timely Submission Points - If the FFY 2024 APR was submitted on-time, place the number 5 in the cell on the right.	5
Grand Total - (Sum of Subtotal and Timely Submission Points) =	24

(1) In the SPP/APR Data table, where there is an N/A in the Valid and Reliable column, the Total column will display a 0. This is a change from prior years in display only; all calculation methods are unchanged. An N/A does not negatively affect a State's score; this is because 1 point is subtracted from the Denominator in the Indicator Calculation table for each cell marked as N/A in the SPP/APR Data table.

618 Data (2)

Table	Timely	Complete Data	Passed Edit Check	Total
Child Count/ Ed Envs Due Date: 7/30/25	1	1	1	3
Personnel Due Date: 2/18/26	1	1	1	3
Exiting Due Date: 2/18/26	1	0	1	2
Discipline Due Date: 2/18/26	1	1	1	3
State Assessment Due Date: 1/7/26	1	0	1	2
Dispute Resolution Due Date: 11/19/25	1	1	1	3
MOE/CEIS Due Date: 11/19/25	1	1	1	3

618 Score Calculation

Subtotal	19
Grand Total (Subtotal X 1.28571429) =	24.43

(2) In the 618 Data table, when calculating the value in the Total column, any N/As in the Timely, Complete Data, or Passed Edit Checks columns are treated as a '0'. An N/A does not negatively affect a State's score; this is because 1.28571429 points are subtracted from the Denominator in the Indicator Calculation table for each cell marked as N/A in the 618 Data table.

Indicator Calculation

A. APR Grand Total	24
B. 618 Grand Total	24.43
C. APR Grand Total (A) + 618 Grand Total (B) =	48.43
Total N/A Points in APR Data Table Subtracted from Denominator	0
Total N/A Points in 618 Data Table Subtracted from Denominator	0.00
Denominator	54.00
D. Subtotal (C divided by Denominator) (3) =	0.8968
E. Indicator Score (Subtotal D x 100) =	89.68

(3) Note that any cell marked as N/A in the APR Data Table will decrease the denominator by 1, and any cell marked as N/A in the 618 Data Table will decrease the denominator by 1.28571429.

APR and 618 -Timely and Accurate State Reported Data

DATE: February 2026 Submission

SPP/APR Data

1) Valid and Reliable Data - Data provided are from the correct time period, are consistent with 618 (when appropriate) and the measurement, and are consistent with previous indicator data (unless explained).

Part B 618 Data

1) Timely – A State will receive one point if it submits all *EDFacts* files associated with the IDEA Section 618 data collection to ED by the initial due date for that collection (as described in the table below).

618 Data Collection	EDFacts Files	Due Date
Part B Child Count and Educational Environments	FS002 & FS089	7/30/2025
Part B Personnel	FS070, FS099, FS112	2/18/2026
Part B Exiting	FS009	2/18/2026
Part B Discipline	FS005, FS006, FS007, FS088, FS143, FS144	2/18/2026
Part B Assessment	FS175, FS178, FS185, FS188	1/7/2026
Part B Dispute Resolution	FS227, FS228, FS229, FS230	11/19/2025
Part B LEA Maintenance of Effort Reduction and Coordinated Early Intervening Services	FS231, FS232, FS233, FS234, FS235, FS236, FS237, FS238	11/19/2025

2) Complete Data – A State will receive one point if it submits data for all files, permitted values, category sets, subtotals, and totals associated with a specific data collection by the initial due date. No data is reported as missing. No placeholder data is submitted. The data and metadata responses submitted to *EDFacts* align. State-level data include data from all districts or agencies.

3) Passed Edit Check – A State will receive one point if it submits data that meets all the edit checks related to the specific data collection by the initial due date. The counts included in 618 data submissions are internally consistent within a data collection.

Dispute Resolution

IDEA Part B

Montana

School Year: 2024-25

Section A: Written, Signed Complaints

(1) Total number of written signed complaints filed.	14
(1.1) Complaints with reports issued.	10
(1.1) (a) Reports with findings of noncompliance	4
(1.1) (b) Reports within timelines	10
(1.1) (c) Reports within extended timelines	0
(1.2) Complaints pending.	2
(1.2) (a) Complaints pending a due process hearing.	0
(1.3) Complaints withdrawn or dismissed.	2

Section B: Mediation Requests

(2) Total number of mediation requests received through all dispute resolution processes.	4
(2.1) Mediations held.	3
(2.1) (a) Mediations held related to due process complaints.	1
(2.1) (a) (i) Mediation agreements related to due process complaints.	1
(2.1) (b) Mediations held not related to due process complaints.	2
(2.1) (b) (i) Mediation agreements not related to due process complaints.	1
(2.2) Mediations pending.	1
(2.3) Mediations withdrawn or not held.	0

Section C: Due Process Complaints

(3) Total number of due process complaints filed.	2
(3.1) Resolution meetings.	1
(3.1) (a) Written settlement agreements reached through resolution meetings.	1
(3.2) Hearings fully adjudicated.	0
(3.2) (a) Decisions within timeline (include expedited).	0
(3.2) (b) Decisions within extended timeline.	0
(3.3) Due process complaints pending.	0
(3.4) Due process complaints withdrawn or dismissed (including resolved without a hearing).	2

Section D: Expedited Due Process Complaints (Related to Disciplinary Decision)

(4) Total number of expedited due process complaints filed.	0
(4.1) Expedited resolution meetings.	0
(4.1) (a) Expedited written settlement agreements.	0
(4.2) Expedited hearings fully adjudicated.	0
(4.2) (a) Change of placement ordered	0
(4.3) Expedited due process complaints pending.	0
(4.4) Expedited due process complaints withdrawn or dismissed.	0

This report shows the most recent data that was entered by:
Montana

These data were extracted on the close date:
11/19/2025

How the Department Made Determinations

Below is the location of How the Department Made Determinations (HTDMD) on OSEP's IDEA Website. How the Department Made Determinations in 2026 will be posted in June 2026. Copy and paste the link below into a browser to view.

<https://sites.ed.gov/idea/how-the-department-made-determinations/>



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES

Final Determination Letter

June 18, 2026

Honorable Susan Hedalen
Superintendent of Public Instruction
Montana Office of Public Instruction
1227 11th Avenue
Helena, MT 59601

Dear Superintendent Hedalen:

I am writing to advise you of the U.S. Department of Education's (Department) 2026 determination under Section 616 of the Individuals with Disabilities Education Act (IDEA). The Department has determined that Montana needs assistance in implementing the requirements of Part B of the IDEA. This determination is based on the totality of Montana's data and information, including the Federal fiscal year (FFY) 2024 State Performance Plan/Annual Performance Report (SPP/APR), other State-reported data, and other publicly available information.

Montana's 2026 determination is based on the data reflected in its "2026 Part B Results-Driven Accountability Matrix" (RDA Matrix). The RDA Matrix is individualized for each State and Entity and consists of:

- (1) a Compliance Matrix that includes scoring on Compliance Indicators and other compliance factors;
- (2) a Results Matrix that includes scoring on Results Elements;
- (3) a Compliance Score and a Results Score;
- (4) an RDA Percentage based on both the Compliance Score and the Results Score; and
- (5) the State's or Entity's Determination

The RDA Matrix is further explained in a document, entitled "[How the Department Made Determinations under Section 616\(d\) of the Individuals with Disabilities Education Act in 2026: Part B](#)" (HTDMD).

The Office of Special Education Programs (OSEP) is continuing to use both results data and compliance data in making determinations in 2026, as it did for Part B determinations in 2015-2025. (The specifics of the determination procedures and criteria are set forth in the HTDMD document and reflected in the RDA Matrix for Montana).

In making Part B determinations in 2026, OSEP continued to use results data related to:

- (1) the participation of children with disabilities (CWD) on Statewide assessments (which include the regular assessment and the alternate assessment);
- (2) the participation and performance of CWD on the most recently administered (school year 2023-2024) National Assessment of Educational Progress (NAEP), as applicable (For the 2026 determinations, OSEP is using results data on the participation and performance of children with disabilities on the NAEP for the 50 States, the District of Columbia, the Bureau of Indian Education (BIE), and Puerto Rico. OSEP used the available NAEP data for Puerto Rico in making Puerto Rico's 2026 determination as it did for Puerto Rico's 2025 determination. OSEP used the publicly available NAEP data for the BIE that was comparable to the NAEP data available for the 50 States, the District of Columbia and Puerto Rico; specifically OSEP did not use NAEP participation data in making the BIE's 2026 determination because the most recently administered NAEP participation data for the BIE that is publicly available is 2020, whereas the most recently administered NAEP participation data for the 50 States, the District of Columbia, and Puerto Rico that is publicly available is 2024);
- (3) the percentage of CWD who graduated with a regular high school diploma; and
- (4) the percentage of CWD who dropped out.

You may access the results of OSEP's review of Montana's SPP/APR and other relevant data by accessing the EDFacts Metadata and Process System (EMAPS) SPP/APR reporting tool using your Montana-specific log-on information at <https://emaps.ed.gov/suite/>. When you access Montana's SPP/APR on the site, you will find, in applicable Indicators 1 through 18, the OSEP Response to the indicator and any actions that Montana is required to take. The actions that Montana is required to take are in the "Required Actions" section of the indicator.

It is important for your State to review the Introduction to the SPP/APR, which may also include language in the "OSEP Response" and/or "Required Actions" sections.

Your State will also find the following important documents in the Determinations Enclosures section:

- (1) Montana's RDA Matrix;

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The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

- (2) the HTDMD [link](#);
- (3) "2026 Data Rubric Part B," which shows how OSEP calculated Montana's "Timely and Accurate State-Reported Data" score in the Compliance Matrix; and
- (4) "Dispute Resolution 2024-2025," which includes the IDEA Section 618 data that OSEP used to calculate the Montana's "Timely State Complaint Decisions" and "Timely Due Process Hearing Decisions" scores in the Compliance Matrix.

As noted above, Montana's 2026 determination is Needs Assistance. A State's or Entity's 2026 RDA Determination is Needs Assistance if the RDA Percentage is at least 60% but less than 80%. A State's or Entity's determination would also be Needs Assistance if its RDA Determination percentage is 80% or above but the Department has imposed Specific Conditions on the State's or Entity's last three IDEA Part B grant awards (for FFYs 2023, 2024, and 2025), and those Specific Conditions are in effect at the time of the 2026 determination.

Montana's determination for 2025 was also Needs Assistance. In accordance with Section 616(e)(1) of the IDEA and 34 C.F.R. § 300.604(a), if a State or Entity is determined to need assistance for two consecutive years, the Secretary must take one or more of the following actions:

- (1) advise the State or Entity of available sources of technical assistance that may help the State or Entity address the areas in which the State or Entity needs assistance and require the State or Entity to work with appropriate entities;
- (2) direct the use of State-level funds on the area or areas in which the State or Entity needs assistance; or
- (3) identify the State or Entity as a high-risk grantee and impose Specific Conditions on the State's or Entity's IDEA Part B grant award.

Pursuant to these requirements, the Secretary is advising Montana of available sources of technical assistance, including OSEP-funded technical assistance centers and resources at the following website: [Individuals with Disabilities Education Act \(IDEA\)](#), and requiring Montana to work with appropriate entities. The Secretary directs Montana to determine the results elements and/or compliance indicators, and improvement strategies, on which it will focus its use of available technical assistance, in order to improve its performance. We strongly encourage Montana to access technical assistance related to those results elements and compliance indicators for which it received a score of zero. Montana must report with its FFY 2025 SPP/APR submission, due February 1, 2027, on:

- (1) the technical assistance sources from which Montana received assistance; and
- (2) the actions Montana took as a result of that technical assistance.

As required by IDEA Section 616(e)(7) and 34 C.F.R. § 300.606, Montana must notify the public that the Secretary of Education has taken the above enforcement actions, including, at a minimum, by posting a public notice on its website and distributing the notice to the media and through public agencies.

The Department is committed to transparency, accountability, strong partnerships with States and stakeholders, high expectations, and improved outcomes for children with disabilities. To support these priorities, the Secretary is considering modifications to the factors the Department uses when making determinations, effective June 2027. Potential additional factors include graduation rates and assessment data, such as graduation rates for students with disabilities compared to all students, and Statewide assessment results of students with disabilities compared to all students. Other potential factors include longstanding noncompliance (such as OSEP-identified noncompliance that remains unresolved) as a factor in determinations.

For the FFY 2025 SPP/APR submission due on February 1, 2027, OSEP is providing the following information about the IDEA Section 618 data. The 2025-26 IDEA Section 618 Part B data submitted as of the due date will be used for the FFY 2025 SPP/APR and the 2027 IDEA Part B Results Matrix and data submitted during correction opportunities will not be used for these purposes. The 2025-26 IDEA Section 618 Part B data will automatically be prepopulated in the SPP/APR reporting platform for Part B SPP/APR Indicators 1, 2, 3, 5, 6, 15, and 16 (as they have in the past). States and Entities are expected to submit high-quality IDEA Section 618 Part B data that can be published and used by the Department as of the due date. States and Entities are expected to conduct data quality reviews prior to the applicable due date. OSEP expects States and Entities to take one of the following actions for all business rules that are triggered in EDPass prior to the applicable due date: 1) revise the uploaded data to address the business rule; or 2) provide a data note addressing why the uploaded data triggered the business rule. States and Entities will be unable to submit the IDEA Section 618 Part B data without taking one of these two actions. There will not be a resubmission period for the IDEA Section 618 Part B data.

As a reminder, Montana must report annually to the public, by posting on the State educational agency's (SEA's) website, the performance of each local educational agency (LEA) located in Montana on the targets in the SPP/APR as soon as practicable, but no later than 120 days after Montana's submission of its FFY 2024 SPP/APR. In addition, Montana must:

- (1) review LEA performance against targets in the Montana's SPP/APR;
- (2) determine if each LEA "meets the requirements" of Part B, or "needs assistance," "needs intervention," or "needs substantial intervention" in implementing Part B of the IDEA;
- (3) take appropriate enforcement action; and
- (4) inform each LEA of its determination.

Further, Montana must make its SPP/APR available to the public by posting it on the SEA's website. Within the upcoming weeks, OSEP will be finalizing a State Profile that:

- (1) includes Montana's determination letter and SPP/APR, OSEP attachments, and all State or Entity attachments that are accessible in accordance with Section 508 of the Rehabilitation Act of 1973; and
- (2) will be accessible to the public via the ed.gov website.

OSEP appreciates Montana's efforts to improve results for children and youth with disabilities and looks forward to working with Montana over the next year as we continue our important work of improving the lives of children with disabilities and their families. Please contact your OSEP State Lead if you have any questions, would like to discuss this further, or want to request technical assistance.

Sincerely,

A handwritten signature in black ink that reads "Erin McHugh". The signature is fluid and cursive, with the first name "Erin" and last name "McHugh" clearly distinguishable.

Erin McHugh
Deputy Director
Office of Special Education Programs

cc: Montana Director of Special Education