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EXAMINING SCHOOL BUILDING-LEVEL IMPLEMENTATION
OF AN MTSS PROBLEM-SOLVING TEAM

A Dissertation Presented

by

Nicole Carter

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Abstract

The Multi-Tiered System of Support Problem-Solving Team (MTSS-PST) organizes the review of student learning data to identify problems, apply solutions, and evaluate progress towards grade level learning outcomes (Cook, Burns, Browning-Wright, & Gresham, 2010; Eagle et al., 2015; Gamm et al., 2012; Tilly, 2008). Outside of the MTSS framework, the PST is recognized as a best practice approach to identifying and implementing academic and social emotional interventions to improve learning outcomes (Algozzine et al., 2014; Burns & Symington, 2002; Doll et al., 2005; Shinn, 2005). Contemporary policy implementation research frames MTSS-PST as complex educational policy whose implementation is contingent upon, and situated by, interactions between the people implementing it, the policy itself, and the place where implementation occurs (Honig, 2006). There is little research, however, on MTSS-PST implementation. This study was designed to add to scholarly understanding of the MTSS-PST implementation process by examining how and why school building-level administrators were thinking about and planning for it.

Analysis of the data revealed the following: (a) MTSS-PST implementation is understood by building-level administrators as an essential component in fulfilling the school district's K-12 directive to reduce special education referrals with a Multi-Tiered System of Support framework; (b) Building-level administrative thinking and planning for MTSS-PST implementation is focused on reorganizing and improving how the school's support team sorts students for support services; (c) Building administrator's implementation decision-making is influenced by the simultaneous feeling of relief and burden brought on by the early success of implementation and the significant challenges it faces due to limited planning and resources.

Analysis also showed that implementation is rooted in a transactional approach to change focused entirely on meeting districtwide objectives to increase the efficiency and efficacy of the school's teaching and learning services with no reference to the transformative potential cited in the research literature. Lastly, analysis of the findings revealed that more than 70 different interactions that occurred between people, policy, and place shaped the MTSS-PST implementation process demonstrating that implementation of this policy is both situated and contextual.

Dedication

Dedicated to my husband who has supported me with time, patience, and acceptance. To him, I hope I can be of equal support.

Acknowledgements

Thank you first and foremost to the Superintendent who graciously supported my academic work. Though I am unable to include the Superintendent's name, because it would compromise the confidentiality of this paper, those who know, know. Without that support, this dissertation would be no more than an idea shared in conversation alone.

This dissertation is the product of a web of women, encouraging, teaching, supporting, questioning, and calling forth scholarly work. Their work in a small New England town inspired me to study what and how they were working each day to make schools better places for learning and the support of all students. I thank them for their brilliance, humor, and ability to do the right thing.

Thank you also to Katharine Shepherd for answering all of my many emails, meeting with me at each and every stage, providing many instances of positive meta-dissertation-analysis, and for reading, re-reading and then reading again! To the members of my dissertation committee— Tammy Kolbe and Maureen Neumann— intelligent and thoughtful women of academe who provided me with invaluable constructive feedback. And to Wanda Heading-Grant for chairing the committee.

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And finally, I humbly thank my mother for supporting me in many different ways as I went back to school, yet again.

Table of Contents

Introduction

Almost all current school reform ideas to improve K-12 academic outcomes leave the basic structure of American schooling fundamentally unchanged despite evidence that the existing systems do not work and scant clarity about which educational policies will deliver true reform (Mehta, Schwartz, & Hess, 2012).   The Multi-Tiered Systems of Support (MTSS) framework is described in the research literature as an educational policy with the potential to deliver true reform by shifting the thinking and practice of educators through its reorganization of academic and social emotional supports within a school (Gamm et al., 2012; Eagle, Dowd-Eagle, Snyder, & Holtzman, 2015; Tilly, 2008). The purpose of this research is to improve scholarly and applied understanding about school administrator's implementation of MTSS's central mechanism, the Problem-Solving Team (PST).

The PST process is a proactive collaborative problem-solving process that reorients staff expectations and responsibilities by focusing them on identifying and removing obstacles to individual student learning (Averill & Rinaldi, 2011; Brown-Chidsey, 2005; Eagle et al., 2015; Howell et al., 2010; Tilly, 2008). This is achieved through the MTSS-PST's analysis of student outcome-data to identify and apply evidence-based practices (EBPs) to improve

1

academic and social emotional outcomes (Averill & Rinaldi, 2011; Brown-Chidsey, 2005; Eagle et al., 2015; Howell et al., 2010; Tilly, 2008).

Research shows that implementation of complex educational policies like MTSS-PST requires understanding of the policy as well as how organizations approach and manage the implementation process (Fixsen et al., 2005; Honig, 2006). This is especially true when it comes to the implementation of educational policies like MTSS, which is designed to press for fundamental and complex changes in how schools organize themselves (Fixsen, Naoom, Blasé, Friedman, & Wallace, 2005; Honig, 2006; Spillane, Reiser, & Reimer, 2002). Despite awareness in the research community that the implementation of policies like MTSS is a significantly complex act in need of closer examination, there is little research about the implementation process from which schools can draw (Algozzine et al., 2014; Doll et al., 2005; Fixsen et al., 2005; Forman & Crystal, 2010; Honig, 2006; Spillane, 1998; Tilly, 2008). The purpose of this research is to address this need.

Purpose of the Research

This study was designed to describe and explain the experiences of three building-level school administrators implementing school district MTSS-PST policy in a New England elementary school. The implementation experiences captured by this study were designed to answer two questions:

1. How do the building-level administrators for one New England elementary school conceptualize the process of implementing school district MTSS-PST policy?

 2. Why are the building-level administrators in one New England elementary school making their specific MTSS-PS implementation decisions?

To answer these questions, I employed a qualitative, cross-case study designed to gather data through interviews, an observation, and a review of MTSS documents. Interviews were conducted with each of the three building-level administrators leading MTSS-PST implementation in their elementary school building. The experiences of the two district office administrators supervising implementation in this building were also collected to contextualize thinking and decision-making at the building level. A three-hour MTSS-PST meeting was observed one time during the study, and the school district's K-12 MTSS policy handbook was reviewed. At the time of this research, the administrators were in their second year of MTSS-PST implementation.

The data for this study was analyzed using procedures associated with qualitative inquiry. This was followed by application of a contemporary educational policy implementation framework and concepts. Together, the analysis and application of scholarly work makes both an empirical and

conceptual contribution to the research literature. The empirical contribution is the identification and explication of the themes that emerged from building-based and district office administrator's implementation experiences. The conceptual contribution is the application of Honig's (2006) implementation of complex educational policy framework to refine understanding about the MTSS-PST implementation process. Taken together, these contributions begin to provide insight about the process of MTSS-PST implementation policy at the school-building level. This research may also heighten awareness and create dialogue within the studied school and district, increasing attention to experiences that may have been overlooked, and provoking insights about how to improve practices and policies (Creswell, 2013).

Literature Review

Background of the Study

The MTSS framework coordinates flexible, data-based responses to student learning needs by applying evidence-based practices (EBPs) at tiered levels of support (Eagle et al., 2015; Tilly, 2002; Tilly, 2008). By design, MTSS is an integrated flexible framework designed to organize the delivery of services, giving schools the ability to meet academic and social-emotional needs preventatively (Sugai & Horner, 2002; Tilly, 2008). MTSS is a preferred educational policy initiative because it meets a variety of needs, including its integration of the twin concerns of academics and behavior, the efficiency of its organization of scarce resources, and its growing empirical foundation (Eagle et al., 2015). It is educational policy to foster the multidimensional reorganization of public schooling (Forman & Crystal, 2015).

The EBPs offered within a MTSS framework have been established in the research literature as effective intervention strategies for meeting academic and social-emotional outcomes (Averill & Rinaldi, 2011; Cook, Lyon, Kubergovic, Wright & Zhang, 2015). The process for accessing these EBPs is housed within an MTSS Problem Solving Team (PST).

Specifically, when students do not meet grade level academic outcomes (e.g., grade level 4 reading comprehension), the PST measures the gap between a

student's performance data (e.g., reading comprehension at grade level 2) and the desired grade level outcome measure (e.g., reading comprehension at grade level 4) with the PST then assigning the student to a level and type of EBP, commonly referred to as an "intervention," to close the gap between the student's performance and the desired outcome goal (Averill & Rinaldi, 2011; Cook, Lyon, Kubergovic, Wright, & Zhang, 2015; Tilly, 2008). Interventions delivered at Tier 1 are defined as the least intensive, with Tiers 2 and 3 designed to increase the intensity and frequency of interventions needed to meet outcomes (Averill & Rinaldi, 2011; Cook et al., 2015; Tilly, 2008). After a student receives an intervention for a set number of weeks, the PST reviews student data to determine whether the gap has been closed; if the gap has closed and the student no longer requires intervention services at the Tier 2 or 3 level, the PST will remove the student from Tier 2 or 3 instruction, and the student will then receive Tier 1 instruction, frequently referred to as the universal level of learning (Averill & Rinaldi, 2011; Cook et al., 2015; Tilly, 2008).

The MTSS-PST process coordinates this framework of interventions through its structured team problem-solving process, which provides support to all three tiers through its review of student assessment data and EBPs (Tilly, 2008). The PST process is considered critical to implementation of the entire MTSS framework, because it is the central

mechanism driving the organization of teaching and learning for all students not meeting grade level outcomes (Tilly, 2008). In so doing, the PST process shifts the structure of schooling away from a "one-size fits all" approach to teaching and learning to an approach organized around team problem solving to answer two questions new to general education: "What intervention can we apply?" and "How can we change what we are doing to solve this problem?" (Deno, 2010).

MTSS policy, and by extension the MTSS-PST process itself, however, faces multiple barriers to its uptake and sustained use at the building level with recent MTSS researchers calling for an examination of the experiences of building-level administrators tasked with its implementation (Cook et al., 2015). This literature review provides a research context for such an examination and is organized to examine key concepts related to both the MTSS framework and the PST process as well as the contemporary educational policy implementation research concepts informing the study design.

Understanding MTSS-PST

This literature review begins with a description of the educational policy context out of which the MTSS framework grew, followed by a summary of the characteristics of both MTSS and the PST process. I then turn to the educational

policy implementation research and review the implementation concepts that guided examination of the building-level implementation process.

MTSS policy context: 1997-2004. MTSS is the latest iteration of a body of policy initiatives aimed at supporting students with varying levels of need beginning with the federal government's 1997 reauthorization of the Individuals with Disabilities Education Act (IDEA-1997). IDEA-1997 codified a variety of approaches to supporting underperforming students into the policy and practice of every school in America; IDEA-1997 required schools to take specific steps to address behaviors that prevented students from learning, including the use of intervention plans that contained the collection and review of student learning data (Gable, Quinn, Rutherford Jr, Howell, & Hoffman, 2000; Sugai & Horner, 2002).

The groundwork for these "applied interventions" began as early as 1968, when Baer, Wolf, and Risley (1968) advocated for the application of applied behavior analysis (ABA) to improve human behavior by using research validations, systemic implementation efforts, and specific strategies to improve the practices and structures of the whole school (Sugai & Horner, 2002). The 1997 amendments to IDEA not only emphasized the promotion of these practices for students with disabilities, but they also emphasized the role of the classroom

8

teacher in using EBPs to help students advance academically and behaviorally (Gable et al., 2000).

The next most impactful policy initiative to unfold after IDEA-1997 was the federal government's enactment of the 2001 No Child Left Behind Act (NCLB). Federal education policy, like policies for other highly-complex public service organizations at this time, focused on improving student outcomes through the identification and use of evidence-based teaching practices (Fixsen et al., 2015). NCLB (2001) approached this policy target by tying access to federal funds to the implementation of EBPs in teaching and learning (West, 2016). The climate fostered by NCLB (2001) policy targets and leverage led many school systems to reorganize themselves under emerging frameworks designed to increase tiered school-wide EBPs (Sugai & Horner, 2002). Two of the most popular have been Response to Intervention (RtI) and Positive Behavioral Interventions and Supports (PBIS) (Sugai & Horner, 2002).

The RtI framework was designed to organize academic interventions to improve student academic outcomes, while PBIS organized behavioral interventions to improve student behavior (Eagle et al., 2015). As these frameworks were applied in schools, it became apparent that a problem-solving team was an effective process for providing classroom teachers with the support they needed in such frameworks (Bahr & Kovaleski, 2006).

9

Both RtI and PBIS shared a structure of tiered interventions: Tier 1

provided high quality, research-based instruction for all students in the general

education environment; Tier 2 continued monitoring of individual progress

while adding increasing levels of intervention; Tier 3 provided the most intensive

interventions through which a student could benefit (Averill & Rinaldi, 2011).

The addition of a problem-solving process, the PST, provided schools with an

EBP through which they could review relevant student data to determine

appropriate tiered interventions (Eagle et al., 2015; Hollenbeck, 2007; Nelson,

Benner, Lane, & Smith, 2004; Sugai & Horner, 2009).   School's interests in RtI

and PBIS implementation were furthered by IDEA amendments in 2004, which

permitted local education agencies (LEA) to use data from EBPs as part of the

IDEA disability determination process and as a preventive intervention practice

within the general education environment (Hollenbeck, 2007).

IDEA-2004 permitted schools to determine eligibility for special education

services for students with a suspected specific learning disability (SLD) by using

a student's response, or lack thereof, to EBPs implemented with fidelity and

monitored over a period of time (Tilly, 2008). Although neither IDEA-2004 nor

NCLB (2001) mandated the use of RtI or PBIS frameworks, both policies

emphasized the centrality of evidence-based practices, data collection, and a

tiered approach to meeting student needs (Eagle et al., 2015; Nelson, Benner,

Lane, & Smith, 2004; Tilly, 2008; Sugai & Horner, 2009). At the same time, the U.S. Department of Education (DOE) was overseeing a variety of additional programs and policies that also promoted the use of EBPs; these included the Safe and Supportive Schools grants, research and recommendations from the Institute of Education Sciences, and policy white papers from the Office of Special Education Programs (OSEP).

In this policy environment, many school leaders were hungry for an organizational structure with which to align their school practices with federal policies that encouraged the use of evidence-based practices (Eagle et al., 2015). Designing a unified or integrated framework was a logical next step for many schools who sought funding and alignment with federal education policies, and the integration of RtI and PBIS into a multi-tiered system of support made sense for two reasons. First, there was evidence that integrated frameworks were more effective, and second, implementing two parallel systems of supports was likely to stress an already strained system (Eagle et al., 2015). Simply put, a single integrated system made both conceptual and practical sense (Eagle et al., 2015; Nelson, Benner, Lane, & Smith, 2004; Sugai & Horner, 2009).

MTSS framework: Key characteristics. The Multi-Tiered System of Support, or MTSS, was quickly identified as an all-encompassing system that could include both RtI and PBIS, and most in the education field have shifted to

11

conceptualizing academic and behavioral supports as "living" under the unified

MTSS framework (Averill & Rinaldi, 2010; Bohanon, Goodman, McIntosh, &

Talk, 2011; Eagle et al., 2015). MTSS is an educational policy designed to improve

the application of EBPs through a problem-solving process to organize

application of such practices (Forman &Crystal, 2015; Sugai & Horner, 2002). The

research literature consistently describes MTSS as a prevention-oriented

framework that organizes and systematizes the application of EBPs, known as

interventions, by collecting data early and often to determine a student's level of

intervention in academic and social-emotional learning (Cook, Burns, Browning-

Wright, & Gresham, 2010; Eagle et al., 2015; Gamm et al., 2012).

The idea for a single framework to provide schools with an evidence-

based model of education grounded in data-based problem-solving techniques

has gradually become a generally (though not universally) accepted framework

for schools (Eagle et al., 2015; Gamm et al., 2012).   The research literature most

often conceptualizes this framework as a triangle sliced into three horizontal

pieces with the largest slice at the bottom (Cook et al., 2015). While the

percentage of students at each tier can vary, most scholars and practitioners

make the case that approximately 80% of a school's population receive services

in the bottom slice referred to as Tier 1. Tier 1 students reach a school's standards

and benchmarks with high-quality instruction and minimal interventions

(Horner & Sugai, 2002; Walker et al., 1996). Tier 2 students receive interventions within the second slice of the triangle that are estimated to serve roughly 10-15% of students who need supplemental academic and/or social-emotional interventions to become proficient, while as few as 5% of students will receive Tier 3 supports through an even more intensive program of supplemental instruction and/or supports (Tilly, 2002). Organizing these supports is the work of the MTSS-PST.

The problem-solving team (PST): Key characteristics. Over time, the research literature shows that the PST has evolved into an oft-cited essential element of school reform (Kovaleski & Glew, 2006). It is commonly assumed that problem solving by a team is preferred to the problem solving of individual teachers who act alone (Algozzine et al., 2014). The central idea of the process is to shift the focus of staff attention away from an examination of what is wrong with the child to a focus on what the school needs to do differently to ensure student learning (Deno, 2005). The PST shifts the practice of teaching by organizing the collection and review of data, making it possible for schools to identify and evaluate the interventions provided in each of the three tiers and in so doing remove obstacles to student learning (Tilly, 2008).

As a team problem-solving process, the PST is considered a structured process wherein discrete steps are taken to review student's

academic and behavioral progress at both set points in the school year and

on an as-needed basis (Hollenbeck, 2007; Tilly, 2008). At each meeting,

the PST reviews student data, identifies any problems that may be

interfering with student achievement of expected outcomes, and

determines how to intervene with tiered EBPs (Averill & Rinaldi, 2011;

Hollenbeck, 2007; Tilly, 2008). The PST process embedded within MTSS

is considered one of the most effective methods for helping students

achieve school success, and the process is recognized as a best practice for

identifying and implementing interventions (Brown-Chidsey, 2005).

Ideally, the PST is comprised of general educators, special

educators, school psychologists, building-level school administrators, and

others (e.g., school counselors or school-based mental health providers)

considered central in the functioning of a school (Dever, Dowdy, Raines,

& Carnazzo, 2015; Dulaney, Hallam, & Wall, 2013). PST literature

consistently reports that team membership should be varied and that the

participation of a school psychologist and building-level administrator is

essential (Eagle et al., 2015).

While there is no one model for the PST-process, there are core

components that all PSTs have in common: the collection and analysis of student

data, the identification of strengths and problems, and team decision-making

processes that identify what changes can be made to instruction to improve student performance through the application of evidence-based practices (EBPs). Follow-up meetings to review the results of interventions/EBPs are a must as well (Algozzine et al., 2014). The process is not considered completed until there is observable change in the outcome, specifically, low academic performance is transformed into grade level performance (Algozzine et al., 2014). While the PST is not a difficult concept or practice, it does require the "systematic focus and the perspective, precision, and persistence of an engineer" (Algozzine et al., 2014, p. 6).

Within the MTSS framework, it is the role of the PST to identify the contextual factors and select interventions to solve identified environmental problems (Shinn, 2005). Deno (2005) one of the earliest proponents of the PST process in the context of public schooling, describes a five-stage model to inform a variety of decision-making needs in a school. This process includes five steps: 1) Problem Identification; 2) Problem Definition; 3) Designing Intervention Plans; 4) Implementing Interventions; and 5) Problem Solution (Bransford & Stein, 1984). Tilly (2008) offered a slightly different version of the PST process arguing that the steps are best reframed as a series of questions: "Is there a problem and what is it?"; "Why is the problem happening? "; "What can be done about the problem? "; and "Did the intervention work?" With either approach the core

components of the problem-solving process focus educators on the degree to which a problem with student learning is either an instructional failure or a failure to support positive behavior both of which can be remedied with the application of an intervention (Algozzine et al., 2014; Brown-Chidsey, 2005). From this perspective, the MTSS-PST is a paradigm shift since it places emphasis on alterable instructional variables that stand outside of the child, rather than from within the child (Shinn, 2005). This shift in focus makes the MTSS-PST one of the most effective processes for improving student learning (Algozzine et al., 2014; Burns & Symington, 2002; Doll et al., 2005; Shinn, 2005).

While the PST is critical to an intervention framework like MTSS, little is known about how to best implement the process within an intervention framework (Algozzine et al., 2014; Burns, Peters, & Noelle, 2008; Tilly, 2008). The bulk of research findings about the implementation of the PST are focused on its implementation outside of an MTSS framework (Doll et al., 2005). The research literature provides guidance about the PST process and the need for its implementation, but how schools can implement and engage in the PST process within the MTSS framework remains an unknown (Algozzine et al., 2014).

Summary of MTSS-PST process. The research literature describes the MTSS framework as an approach that reorganizes American schooling into a flexible, responsive evidence-based system in which all students receive supports

to meet grade-level outcomes. It is an educational policy initiative that leverages the principles of well-known approaches to academic and social emotional support by integrating them into a continuum of system-wide resources, strategies, structures, and practices (Averill & Rinaldi, 2011).

The PST process is the central mechanism in this framework because it provides schools with a structured problem-solving process for addressing academic and social-emotional issues. By turning schools into problem-solving enterprises, the PST redefines deficits in student learning as alterable through adjustments to the process of teaching and learning (Bahr & Kovaleski, 2006; Hollenbeck, 2007; Tilly, 2008).

Given the high stakes pressure many state governments and local educational agencies face to raise student outcomes, it makes sense that these policy-making bodies are calling for the implementation of the MTSS framework. School leaders, charged with ensuring that all students learn at high levels in an environment of increasing accountability, are closely examining MTSS research and policies (Dulaney, Hallam, & Wall, 2013). "Numerous school districts and states, including Los Angeles, Boston, Kansas and Utah, have adopted an MTSS framework in an endeavor to more cohesively, comprehensively and coherently meet the needs of all learners" (Averill & Rinaldi, 2011, p. 91).

17

MTSS-PST is educational policy. Descriptions of MTSS policy in New England are consistent with how the framework is described in the research literature. The Massachusetts' Department of Education describes their MTSS framework policy as "a blueprint for school improvement that focuses on system structures and supports across the district, school, and classroom to meet the academic and non-academic needs of all students" (The Massachusetts Executive Office of Education, n.d.). Rhode Island's website describes MTSS as a framework for supporting the academic and behavioral needs of all students within schools and districts in order to improve outcomes for students and provide safe school climates ("Rhode Island Multi-Tiered System of Support, n.d.).

Elsewhere in New England, *Vermont's MTSS-RtII Field Guide* (2012) for MTSS implementation in Vermont schools, explains "it is helpful to think of MTSS-RtII as a comprehensive, systemic approach to teaching and learning designed to improve learning for all students through increasingly differentiated and intensified assessment, instruction, and intervention" (p. 3). Interestingly, Vermont's guide also includes a critique of the ways in which schools have hitherto conducted themselves, explaining that MTSS is a preventative approach that is "intended to rectify a number of long-standing problems, including the disproportionate number of minorities and English language learners identified

as learning disabled and the practice of waiting for documented failure before providing services" (p. 3).

Although MTSS is not mandated by federal law, the Every Student Succeeds Act, signed into federal law in 2015, recognizes the effectiveness of MTSS and allows states and districts to use various funding streams, such as, Title I, Title II, and Title IV, to support MTSS implementation (ESSA Overview of School Psychologists, n.d.).

Some states in New England, like Vermont, include MTSS in their educational statutes.

> Each public school shall develop and maintain a tiered system of academic and behavioral supports… [The] tiered system of supports shall, at a minimum, include an educational support team, instructional and behavioral interventions, and accommodations that are available as needed for any student who requires support beyond what can be provided in the general education classroom, and may include intensive, individualized interventions for any student requiring a higher level of support (16 V.S.A. § 2902).

This statute includes a definition of an educational support team using the same language as the research literature does to define a PST:

It is to include a variety of staff members from a variety of disciplines;

determine individualized strategies to meet graduation requirements;

review both academic and behavioral needs; identify accommodations or

other support and assist classroom teachers in planning or providing for

needs in the classroom (16 V.S.A. § 2902)

The Vermont Agency of Education explains on its website that MTSS is also part

of the Vermont Education Quality Standards (2121.5) for schools, which should

operate a framework that includes an educational support team: "a team of

adults review data to determine and apply evidence-based interventions to

improve learning outcomes within a tiered system of support" (Vermont State

Board of Education Manual of Rules and Practices, Series 2000, Education

Quality Standards, 2014).

The adoption of a K-12 MTSS frameworks at the school district level

establishes MTSS as an educational policy since its implementation is an effort to

direct local action through a school improvement program. As such, district

administrators implementing the framework become policy makers at the local

level (Anyon, 2005; Fowler, 2000; Honig, 2006). For this reason, understanding

how and why building-level administrators implement MTSS-PST in their

schools necessitates understanding what the research says about the

implementation of educational policy, particularly at the at the building-level. The following section addresses such a need.

Implementation of Educational Policy

      Policy implementation at the school level. This section of the literature review examines a framework and set of concepts explaining how school administrators think about and plan for the implementation of educational policy. It begins with a review of Honig's (2006) broad conceptual framework for contemporary educational policy implementation at the local level followed by a review of two core implementation concepts. Taken together, the findings of these researchers help explain what is happening when building-level administrators implement district policy (Honig & Hatch, 2004; Spillane, 1998; Spillane, Reiser & Reimer, 2002).

      Honig's framework. MTSS-PST is part of what Honig (2006) conceptualizes as the fourth wave of educational policy because it focuses on ensuring high standards for all students, addressing the entirety of the local school's system, and is a single "omnibus" approach encompassing a variety of tools to affect change. For Honig (2006), understanding the fourth wave requires confronting how the complex interactions between people, policy, and place shape the implementation process, and contemporary implementation research is designed to uncover these interactions.

21

Honig (2006) illustrates this approach with a conceptual framework showing how the dimensions of people, policy, and place interact to produce a highly contingent and situated implementation process. Application of this framework illuminates how and why complex educational policy unfolds at the local level. From this, it is possible to identify patterns in how the interactions produce results. These patterns can then be used by policy makers and implementers to inform their efforts to leverage core changes within schools and help everyone think more deeply about the conditions under which policy implementation may yield positive results (Honig, 2006).

Two policy implementation concepts providing equally valuable insight about how and why school administrator's think about and plan for implementation of school district policies, include: sense-making (Spillane, 1998; Spillane et al., 2002) and bridging and buffering (Honig & Hatch, 2004). Taken together, these concepts further inform the process of policy implementation at the building-level.

Implementation concept 1: Sense-making. Spillane (1998) explains that the implementation of district educational policy initiatives is impacted by the ways in which local administrators understand, or "make sense" of the policy within the context of their building. Implementation, from this perspective, is shaped by what the cognitive sciences call a "schema", or knowledge structure,

made up of the individual's prior knowledge, expertise, values, beliefs, and experiences (Spillane 1998; Spillane et al., 2002).

An administrator's schema can shape policy implementation in three ways (Spillane et al., 2002). First, an individual's "schemas", or knowledge structures, are employed to make sense of the world focusing and affecting interpretation, especially when new information is ambiguous or partial (Spillane et al., 2002). Second, the activation of schemas means that new ideas, or policies, are understood as a variation of a previous policy rather than as a substantially new idea (Spillane et al., 2002). Third, the less familiarity one has with an idea, the more likely that individual is to rely on the superficial similarities between the new idea and memories of a similar idea or problem. Administrators for whom the central ideas of a policy are new, are more likely to only understand the elements that are similar to other policies (Spillane et al., 2002). Sense-making negatively impacts the implementing agents' ability to understand how a new policy addresses problems with school practices.

Implementation is also affected by a school's administrative structures and norms of action, which, like an individual's schema, produce a response specific to the place in which a policy is being implemented (McLaughlin, 2006). The interplay between the micro-politics of a school and the policy design produce implementation variation. This is particularly evident when the policy

is administratively or technically complex requiring a shift in foundational

theoretical knowledge to maintain the policy's essential qualities (McLaughlin,

2006).

For these reasons, policy implementation that is focused on the

availability of resources or good leadership should be shifted to understanding

and changing the ways in which administrators make sense of policy (Spillane et

al., 2002). Without the time and opportunities to understand and fully construct

the meaning and idea of a policy initiative, new policy will likely fail as it

mutates into something it is not (Spillane et al., 2002).

Honig and Hatch (2004) describe a similarly significant interaction that

unfolds to shape the implementation of contemporary educational policy; in

addition to the intra-personal interactions that influence policy implementation,

there are inter-personal interactions between school building administration and

their supervisors in the district office which influence the implementation of new

district policies.

Implementation concept 2: Bridging and buffering. Honig and Hatch

(2004) explain that the implementation of policy from a central district office to

the building level is an ongoing process of negotiation between two sets of

administrators as they address district policy designs and building-level goals.

This negotiation of fit, between district demands and building goals, is an

interactive process which Honig and Hatch (2004) call "bridging and buffering" through which district mandated policy is shaped by the degree to which building level administrators either invite, or "bridge," to the policy, or conversely, limit, or "buffer," interaction between their school and the new policy.

Building-level bridging activities occur when school administration invites the policy environment in by including external actors in the building environment, or, by shaping the terms of their compliance by influencing the design of the district policy. Buffering, on the other hand, occurs when school administration advances their own goals and strategies by minimizing engagement with the policy, such as adding peripheral structures within the school that mimic compliance with the policy but do not actually derail a school's goals and strategies (Honig & Hatch, 2004). Buffering also takes place when a school adopts the language of the policy but not the activity the policy demands (Honig & hatch, 2004). It does this by suspending ties with the district office either by not interacting organizationally or by ignoring negative feedback (Honig & Hatch, 2004).

Honig and Hatch (2004) explain that the degree of administrative bridging and buffering undertaken by school administrators when implementing district mandated policy is influenced by the environment of a school. These degrees of

bridging and buffering include the differentiation of roles within a distributed

leadership model, the ways in which professional identity informs the social

construction of the environment, the school's formal relationships with external

agencies, and staff variation all of which interact to shape how school

administrators respond to new district policy mandates (Honig & Hatch, 2004).

Summary: MTSS-PST and Implementation.

As an educational policy, MTSS provides schools with a flexible

organizational system to improve academic and social-emotional outcomes by

repurposing the structure and practice of schooling (Cook et al., 2015; Doll et al.,

2005; Eagle et al., 2015; Sugai & Horner, 2002; Tilly, 2008). The PST process is an

essential element in MTSS's policy design (Averill & Rinaldi, 2011). The

challenge of implementing MTSS-PST is that it tests a school's ability to become a

problem-solving system focused on the identification of environmental changes

that can be made to ensure student progress (Algozzine et al., 2014).   When

effectively implemented, MTSS-PST is a transformative practice, although the

theory still exists ahead of the applied research (Chidsey-Brown 2005; Cook et al.,

2015; Eagle et al., 2015). It is a framework that may have the potential to release

students from schools where documented failure is the only route to

individualized learning supports (*MTSS-RtII Vermont Field Guide*, 2012).

The implementation of complex educational policy at the building level is influenced by a variety of interactions between people, policy, and place (Honig, 2006; Honig & Hatch, 2004; Spillane, 1998; Spillane et al. 2002). Understanding how and why building-level administrators think about and make implementation decisions requires examining how these interactions impact the process. This is especially true when approaching the implementation of an MTSS-PST process that requires broad shifts in the thinking and practice of the purpose of schooling.

Conceptual Framework

At its core, this is a policy implementation study to inform understanding about how MTSS is being implemented in schools. The conceptual framework bridging the literature review to the research study draws on Honig's (2006) model for understanding how and why interactions between the people, policy, and, place shape MTSS-PST implementation.

As an inherently flexible approach to organizing core instruction and support services, MTSS and its PST process, are susceptible to local dimensions, such as the people and place, interacting with the policy to produce results that may increase the likelihood that MTSS-PST will improve students' academic and social-emotional outcomes. The research literature describes the flexible environmental problem-solving response of the MTSS-PST process as an

27

effective approach to supporting student outcomes. The central concept around which the research study was designed, is an exploration of the ways in which implementation of MTSS-PST policy is shaped by context, specifically the interaction between the people, place, and policy being implemented.

By revealing some of the interactions that shape building-based administrators' MTSS-PST implementation, this study has the potential to contribute to the nascent scholarship and applied understanding of local factors that may shape a promising model with which to reform the organization of schooling. While the research literature already points to evidence of PST as an effective process for strengthening students' academic and social emotional achievement, the policy implementation literature suggests that the implementation of educational policies like MTSS is complex and contextually based. To date, there is little research about how local implementation of MTSS-PST is affected by the context in which it unfolds. Increasing understanding about the implementation process is of value because it has the potential to inform the realities of implementation. Better understanding these potential realities may help building-based administrators and scholars alike in crafting MTSS-implementation supports.

Methods

The topics to be discussed in this section include the rationale for the research method, researcher identity, purpose of the research, site and participant selection, data collection and analysis, trustworthiness, and limitations of findings.

Rationale for Qualitative Method

The qualitative research approach chosen for this study was a cross-case study of five participants to explore real-life, contemporary educational policy implementation thinking and decision-making at the school level. Comparing administrative experiences would make it possible to develop a rich, detailed explanation of building-level implementation thinking and decision-making. To this end, the research set out to build a comprehensive understanding by collecting and analyzing data from multiple sources within one site (Creswell, 2013; Miles & Huberman, 1994).

The cases studied included three building-level elementary school administrators and two district office administrators engaged in the second year of MTSS-PST implementation, in accordance with local school district policy. The research was designed to understand how and why building-level administrators were conceptualizing the process of MTSS-PST implementation

and making implementation decisions. The data collected to describe MTSS-PST implementation included interviews, observations, and document review.

Researcher Identity

Conducting research in the school district in which I am employed as a building and program administrator meant there was room for many potential biases to surface at any stage in this research. This compelled me to explore my identity as a researcher as I was designing and collecting data; as such, I have chosen to begin the discussion of my research methods with a discussion of my researcher identity.

While I am not directly involved in the MTSS-PST implementation process in the school where the research took place, the building administrators I interviewed are my professional colleagues; at the time of the research, I was supervising a special education program in their building and was under the direct supervision of the two district administrators who were interviewed for this study. Additionally, I was a member of two districtwide administrative teams focused on both general and special education, as well as the districtwide implementation of MTSS, K-12. Lastly, I am sometimes asked to consult on special education needs as they arise in this elementary school.

The Superintendent, Assistant Superintendent, and Director of Support Service were all involved in the decision to permit the research to take place.

30

While I shared the intent of the study with all three, there were no requests to approach the research in any way other than that which I designed. At no time during the collection and analysis of the data did anyone I interview or work with ask about the research which helped me to maintain a clear boundary between my responsibilities as a district administrator and as a researcher. All data collection was conducted outside of work hours and did not include any other discussions about work responsibilities. I also did not discuss the data collection, other than the topic of the research, with any of the other district administrators with whom I work or any of the employees I supervise. School staff I observed in the MTSS-PST meeting did not ask me about the research.

As a colleague and supervisee of the interviewees, I knew that I had biases stemming from six years of professional relationship. To this end, I offered each interviewee a copy of their interview transcript to review and modify as they saw fit. One building administrator returned a revised transcript to me. The changes made were extensive and increased the opaqueness of the already opaque answers given in the interview; it is likely that the revisions have had the effect of narrowing the findings of this study. Although this narrowing may be a limitation of the study, I offered interviewees their transcripts because I was concerned that the findings might reveal biases that interviewees would not want published in a dissertation. To account for this, analysis of the findings

31

focused on common themes shared by a majority of the interviewees. Their recent work to implement MTSS had required an extensive reallocation of resources and personnel, as well as shifts in administrative duties and responsibilities, and I did not want to add to this challenge by revealing information that the interviewees did not want to share. The potential for revelation about previously unknown opinions or actions in the course of MTSS-PST implementation carried with it an ethical component that a study with many more participants across a district or region may not have had.

After conducting each interview, and then again after transcribing each interview, I journaled about my personal thoughts and feelings that arose. I did this to help filter out personal and professional biases. These journals were not shared with interviewees. Additional steps that I took to address the implications for conducting research in my own backyard are discussed in the data analysis section, including the section on Trustworthiness.

Purpose of the Research

The purpose of the research was to better understand building administrators' implementation of the school district's MTSS-PST policy by understanding how they conceptualize the implementation process and why they are making implementation decisions they are making. This school district's 2017 adoption of a K-12 MTSS framework was influenced by a number

of factors converging at the school district level: the interaction between federal and state educational policies and the MTSS framework, as well as regional pressures to increase the "effectiveness and cost-effectiveness "of special education services. The goal of this study was to provide insight about what happens when MTSS-PST policy is implemented in response to these policy directives and pressures, and by examining how building-based administrators understand MTSS-PST policy and why they make the implementation decisions that they do. This research was designed to reveal the ways in which MTSS-PST implementation is shaped by its context, contributing to the continued scholarly pursuit of American public school reform.

Site and Participant Selection: Description and Rationale

The elementary school in which I chose to conduct my research has the largest population of heterogeneously grouped classrooms supported by an MTSS framework in this school district. All of the approximately 500 students in this school are assigned to a general education classroom. Special education students receive services outside of the general education classroom as do students receiving MTSS Tiers 2 and 3. All grades in this school are discussed in one weekly MTSS-PST meeting. The size of the school, coupled with the potential consistency of only one MTSS-PST meeting for all grades, makes it an ideal site for understanding how and why the MTSS-PST implementation process is

33

unfolding. Further, the school is expected to follow the same MTSS-PST policy

guidelines as all district schools, setting the stage for the findings to inform

practices and/or to conduct future research within the district.

At the time of this study, all three of the administrators leading this school

attended all district MTSS implementation meetings and attended all K-12

district meetings. Two of the three administrators were also members of the

district's special education administration team. Their shared responsibilities for

MTSS implementation meant that the data was likely to reveal both shared and

unique perspectives about the implementation process. One of the three

interviewees was the building Principal, the other two were Assistant Principals.

During the time of implementation, the Principal was supervised by the

Superintendent whereas the Assistants were supervised by the Assistant

Superintendent. All three received weekly guidance from the district's Director

of Support Services. The Assistant Superintendent was charged with

supervising the implementation of MTSS in K-8 schools, and the Director of

Support Services co-facilitated the process without any decision-making

authority; both were interviewed because of their role in supervising

implementation.

Table 1 depicts how data were collected from participants in the study.

Interview questions for all five administrators were identical and focused on

gathering a description of each administrator's experience with the

implementation process, particularly how it unfolded, what the purpose and

meaning of implementation was, what decisions were being made and how they

were made, how implementation aligned with other policies, and what was

challenging and rewarding about the process (Appendix A).   The staff members

under observation in the MTSS-PST meeting included: one school counselor, one

special educator, the school psychologist, the district math coach, one building

administrator, three classroom teachers, and two school counselors seeking

assistance from the team. The note-taking organizer for the observation is

provided in Appendix B.

Table 1

Data Collection Methods

Participant/Data	Data Collection Method
Building Administrators: Principal Assistant Principal 1 Assistant Principal 2	Interview
District Administrators: Assistant Superintendent Director of Support Services	Interview
MTSS-PST members: School Counselor Special Educator School Psychologist District Math Coach Building Administrator Three presenting Classroom Teachers Two presenting School Counselors	Observation
MTSS Manual	Reviewed
District MTSS-Adoption Documents	Reviewed

Data Collection

Interviews were conducted using a semi-structured interview format with each of the building administrators using the 16 interview questions included in Appendix A. These questions were developed based on the content of my literature review as it pertains to MTSS-PST and policy implementation, and feedback from my dissertation proposal committee concerning the data I would need to gather to answer my research questions. These questions were not field-tested, nor were they revised during the interview process. The only additional questions asked during the process were clarifying questions posed when an interviewee's answer was unclear. The interviews took approximately one hour each and took place over the course of two weeks. Interview responses were noted during the interview, and unedited transcripts were provided to each interviewee. Upon completion of each interview, I wrote brief memos of my thoughts and feelings about the interviews using an open-ended approach to the journaling process answering the question, "What did I think and feel based on that interview?"

Although my original study design included interviews with just the building-based administrators, completion of the initial interview process with these principals led me to the conclude that interviewing the Assistant Superintendent supervising MTSS implementation and the Director of Support

Services (who was responsible for providing MTSS implementation guidance)

would further enrich my ability to describe how MTSS-PST implementation was

being conceptualized and acted upon. After consulting with my dissertation

advisor, I contacted the Superintendent for permission to enlarge my interview

pool to include the Assistant Superintendent and Director of Support Services.

Permission was granted. Interviews with both district office administrators were

conducted using the same set of interview questions, again using a semi-

structured interview protocol. Transcripts were again offered for review, though

both administrators declined, and I engaged in the same journaling process.

In addition to the interviews, I observed a three-hour PST meeting using a

PST note-taking guide. The observation note-taking guide is provided in

Appendix B. This guide was developed from a review of PST implementation

research recommending core elements of an effective PST meeting (Algozzine et

al., 2014; Brown-Chidsey, 2005; Deno, 2005; Doll et al., 2009). The intent of the

observation was to better understand what the implemented process looked and

sounded like in action. As organized in Appendix B, these included: (a) the

structure; (b) the use of data; (c) the discussion of interventions; and (d)

intervention planning. During the observation, there was no interaction between

myself and the meeting participants; an explanation of the study and their

consent both took place prior to the observation date. I also reviewed the

district's MTSS manual that is provided in Appendix C. I reviewed the manual

two times, first highlighting key policy instructions about the composition of

team members, the roles of team members, and the process to be followed.

During the second review, I looked for any other information that would help

me understand the PST instructions being followed by the implementing

administrators.

Data Analysis

Data analysis began one week after the interview and the observation and

document review process was completed. I began by reading each transcript

and making marginal notes. I then returned to each transcript to review these

notes to help me identify descriptive in vivo codes pointing to general domains

or categories (Miles & Huberman, 1994); I identified 22 of these as listed in

Appendix D. After reading each transcript and noting these codes, I again wrote

a brief memo to identify my thoughts and feelings about the content of each

interview. I then typed each set of interview responses into a spreadsheet

organized by interview question, aligning each set of answers vertically under

the heading "Administrator" and giving each a number 1-5. Creating this

spreadsheet gave me a chance to review the data a second time, assessing my

initial set of 22 codes to better capture what I saw and heard in the interview data

(Miles & Huberman, 1994). I decided to develop a second set of spreadsheets to

better focus these coding revisions. In so doing, I eliminated half of the 22 in vivo codes to a total of 11 by clumping codes that represented implementation experiences common to at least two of the three building-level administrators (Appendix E). This process entailed going back and forth between two spread sheets, one the master spread sheet and the other that I was creating.

After revising the codes, I set out to determine two things: the degree to which the list of 11 revised codes was free of any personal assumptions, and whether there were additional codes I had missed. I did this by creating a cognitive map. My understanding of myself as a "thinker," led me to choose the cognitive map to organize my data. Miles and Huberman (1994) explain that the cognitive map is helpful in displaying the complexity of people's thinking, which is not always hierarchically organized. The cognitive map, they explain, displays concepts about a particular domain, showing the relationship between ideas and making it possible for the researcher to identify patterns and themes in the data (Miles & Huberman, 1994). I placed each research question at the center of each the two cognitive maps (Appendix F), one for each research question, and then organized the data and identified thematic patterns, noted on the map as secondary circled codes, with supporting data points (Appendix F). I also noted other potential codes but ended up eliminating them when I reviewed the data and could not find more than one or two pieces of evidence for the code. I then

compared the cognitive map to the set of revised codes, determining that the 11 codes were accurate, thus strengthening their internal validity (Miles & Huberman, 1994). Using the cognitive map to return to the set of 11 codes helped me to further interrogate these codes for what they meant and which blocks of data best fit each code (Miles &Huberman, 1994).

These cognitive maps also helped me to identify ways in which my professional relationships with the interviewees, as well as my peripheral engagement with the district's implementation of the MTSS framework, could potentially compromise the data's "authenticity" and "plausibility." When I organized the data into the maps, I quickly recognized that there were codes I wanted to include because of personal assumptions but for which there was little to no supporting evidence (Miles & Huberman, 1994).

Returning to the codes with the cognitive maps also helped me to think more broadly about themes that would capture the coded data because the process enabled me to step back and make deeper conceptual connections between the codes. I identified eight themes by going back and forth between the coded data in the spread sheets and the cognitive maps developing a list that thematically described the data as simply and accurately as possible (Appendix G).

Although the themes that emerged were very different than the previous assumptions I held about the implementation process, they reflected an explanation of the data that I could support with multiple pieces of evidence. They were not the themes I assumed would emerge before data collection. I felt confident that these themes did not reveal my own biases, realizing as I worked that the process was akin to my training and experience as a clinical social worker; I needed to remain conscious of my personal assumptions so that they did not cloud the experiences and perspectives I was seeing/hearing.

After revising the codes, and identifying themes, I noticed the responses of the Assistant Superintendent and Director of Support Services as two separate sets of data would likely compromise confidentiality because their responses contained identifiable information. To check for this, I reviewed the data set from the perspective of a district teacher and found I could easily figure out which district administrator said what. Therefore, I decided to collapse the two sets of district administrator data into one data set. I also reviewed the data collected from the three building administrators testing myself about who said what by comparing my best guesses against the identifiable transcripts; I discovered that for every time I got it right, there were more times that I got it wrong. For the few items that could compromise confidentiality, I removed any identifiable

42

words or phrases without compromising the accuracy of the data.   The removed items were most typically turns of phrases that identified the interviewee.

After collating the data into the eight themes (Appendix G), I reviewed them to determine the degree to which the themes were related and whether there were broader themes. I did this by creating an outline in which I grouped the themes under each of the two research questions to identify how they compared against each other—were there redundancies, contradictions or any reinforcement of similar ideas? How did these themes come together to answer the research questions with the most simplicity and accuracy and without compromising the data? This outline organized the themes by research questions (Appendix H).   I then reviewed the entirety of the data set to ensure that this organization was accurate looking for ways in which the data did and did not support themes and the larger research questions.

After organizing the data set in these ways, I returned to my review of the research literature about how and why implementation unfolds as it does and analyzed how these themes and the data set aligned (or not) with contemporary policy implementation concepts. When I did this, I recognized that it would be interesting to try and "fill out" Honig's (2006) conceptual framework: the dimensions of contemporary education policy implementation in practice and research. (Appendix I). At each interaction point (i.e., people, policy, and place), I

listed data according to Honig's (2006) definition of the interaction point. For example, for the people and policy interaction point, I noted that all administrators interviewed made note of how MTSS-PST policy fit their idea of the importance of data-informed decision making.   I then reviewed each of the three points of interaction in comparison with the themes I identified before applying Honig's (2006) framework. Application of the framework appeared to provide a more nuanced, but similar, explanation of how MTSS-PST policy, these administrators, and the school itself, were interacting to shape the implementation process.

Notes from my PST observation were used in two ways: 1) to triangulate the interview data; and 2) to provide context for the findings. To triangulate data from the interviews, I reviewed the PST observation notes for anything that contradicted or called my themes or findings into question. I used the notes to determine the degree to which what was reported about the purpose and structure of a PST meeting matched the reality of a PST meeting. The observation notes outlined how the PST process unfolded over one three-hour meeting during which four students were discussed. The observation notes were also used to describe a portion of the meeting to provide context for the findings. The PST meeting description at the start of the findings section is a reconstruction of the PST process applied to one of the four students discussed

during the meeting. All four students discussed used the same meeting agenda; the primary difference between each discussion was the presenting teacher and the specific nature and needs of the student being discussed. I also completed a close reading of the MTSS manual making note of all PST rules. These reviews did not call into question the identified themes but instead helped me to better identify the differences between the policy as it is written, as it was described by the interviewees, and as I observed it.

Finally, I met with my advisor to review both the data collection and analysis to determine the degree to which I was checking for and addressing my own biases as a researcher in my own backyard; the degree to which I rigorously reviewed, coded, and grouped the identified themes; and the degree to which my analysis of the themes against the research literature was accurate. During this review, I also shared the ways in which my biases were exposed and how I employed the various strategies noted above, as well as my own practices as a mental health clinician to ensure that I did not tell my story of implementation but instead presented unbiased findings that helped to explain what the administrators were experiencing as they implemented the MTSS-PST process.

Trustworthiness

Miles and Huberman (1994) identify many tactics for increasing the confidence of qualitative findings that address the general finding that most

qualitative researchers rely heavily on preexisting beliefs seeing what they want to see. I employed a number of methods to reduce the likelihood that my biases would compromise the validity of the findings under the heading of bracketing; the employment of neutralizing interviewing tactics, self-awareness, triangulation, the identification of outliers, the identification of negative evidence, and following up on surprises.

Bracketing. The memoing I employed is referred to in the literature as a form of bracketing that is used to mitigate adverse effects of the research endeavor facilitating deeper levels of reflection across all stages of qualitative research (Tufford & Newman, 2010). Bracketing develops self-awareness and reveals presuppositions about the research being conducted to both protect and enhance the research process from personal biases (Tufford & Newman, 2010). After each interview, I journaled my thoughts and opinions about what was shared focusing specifically on what surprised me and/or seemed to contradict what I thought I would hear. I journaled again after I transcribed each interview focusing again on what surprised me or contradicted my personal thoughts about PST implementation. These journals were for my personal reflection and were not shared with interviewees at any time. The journals ended up being a collection of disappointments and frustrations in which I would describe that implementation did not occur how the interviewees described it.

46

Interview tactics and self-awareness. The trustworthiness of the data is also likely impacted by informants crafting responses amenable to the researcher and/or their self-interests recognizing that their interests may conflict with the researcher and not wanting contradictions, compromises, or weaknesses to be uncovered (Miles & Huberman, 1994). Alternatively, a researcher can take on the perspective of those being interviewed and accept an "agreed upon" version to avoid potential findings that might feel like a betrayal of the interviewees private thoughts as they become public (Miles & Huberman, 1994). For these reasons, I conducted each interview with the same approach as I do when meeting with a mental health client or clinical supervisee.

I am a licensed clinical social worker trained to identify personal biases that may interfere with my complete understanding of another's perspective. I was trained in graduate school with taped sessions, role plays and close supervision of sessions to identify how my biases may influence understanding a client's perspective. The first two years of my clinical practice included supervision with a licensed and trained supervising clinician who assisted me in identifying personal prejudices. The practice of identifying bias continued through peer supervision with colleagues and then as a clinical supervisor myself. In my current role as a school administrator, I help teachers and school counselors to identify their biases. One of the core purposes of clinical social

47

work is to learn how to surface and identify biases that could impede one's

understanding of the client's needs. The recognition and limitation of bias is an

essential component to the ethical practice of social work in which the dignity of

the client 's right to self-determination must come first. My education, training,

and practice have included multiple approaches for addressing and rooting out

personal bias when interviewing subjects.

I entered each interview, and the transcription of each interview, with

awareness of what I personally believed I would learn about MTSS-PST

implementation in the district: that it was likely replicating implementation

difficulties that a number of administrators in the district informally identified

when the district implemented a former reform to support services. I went into

this study assuming that this would be one of the core implementation

challenges for the MTSS-PST. My awareness of this personal bias likely caused

me to overcorrect during interviews, again employing my skills as a clinician. I

listened for what the interviewees experienced to hear their take (and not mine)

and by engaging in active listening asked only clarifying questions. It is common

that mental health clinicians will remind themselves to rid themselves of

preconceptions as they begin sessions with clients so that they may hear what is

being said free of any bias of expertise. When interviewing my colleagues and

supervisors, I worried that if my personal perspective was included in their

responses, I would give this away and so focused on not engaging in any sounds, words or non-verbal communication that would reveal my personal thoughts. This caused the first interview to feel, to me, a little awkward or stilted, and so for each of the following interviews, I began with a remark about how at times it may feel awkward because the purpose of the interview was for me to learn and not to converse and exchange ideas or perspectives. I framed the second through fifth interviews as an interaction in which the typical patterns of conversation do not occur.

As a colleague who likes and respects all of the interviewees, I knew it was important to set the stage to ensure that I did not prejudice their responses. Miles and Huberman (1994) explain that,

> the informant and the interviewer…co-construct meaning, producing a 'story' around the 'facts' as each person 'reads' signals: phrases, pauses, digressions, initiation of a new question…cutting off the discussion and so on. The informant learns what the interview is about and decides what can be said- what this story will be about- and how it will be represented. The looser the interview strategy, the less comparable your data (p. 89).

To this end, I shared the list of interview questions with them and did not verbalize anything except to clarify e follow-up questions during the interview. When it seemed obvious how awkward it was that I was not supporting or

affirming their answers, I would say something to the effect of "This can be weird, this interview, because I am working hard not to tell you whether I agree with you or what I think. I am just listening and taking notes. There are no wrong answers you can give."

Lastly, in all interviews, the interviewees shared what they referred to as "off the record" thoughts. When this occurred, I did not take notes and did not include the comments I remembered in my findings or analysis. As noted in the section on limitations, the "off the record" data would likely have enlarged the findings with additional themes, though the exclusion of this data did not detract from the themes identified using "on the record" data.

Triangulation. The findings from this research are impacted by the size of the study; understanding the perspective of five school administrators only tells the perspective of five school administrators and has no generalizability. For these reasons, I set out from the start to triangulate the data by designing the study as a cross case analysis. Triangulation occurred at many stages, including when I compared interviewee's responses to determine whether there was evidence to support the identification of a code and eventually a theme. The interviewees represented a diverse array of administrative interaction with implementation. Of the two district administrators, one was the district lead for implementation and the other self-identified as a support for the district lead. Of

the three building administrators, one was the Principal (ultimately responsible for building implementation), one the Assistant Principal and MTSS-PST facilitator, and another was an Assistant Principal with no direct MTSS-PST experiences.

Lastly, I compared interview data to notes from observation of a PST meeting, as well as the district's PST policy documents, checking for accuracy in descriptions of the MTSS-PST process (Miles & Huberman, 1994). I compared descriptions of what administrators explained was being implemented with the policy document and the PST process as it unfolded in real-time.

Overall, the triangulation of data was a process of analytic deduction. My research design made it possible to analyze data from the observation, manual, and interviews of varied implementers, and then by comparing multiple instances of hearing and seeing MTSS-PST implementation to verify and increase the reliability and trustworthiness of the data (Miles & Huberman, 1994).

Identification of outliers. I also examined data outliers to filter the themes I was identifying (Miles & Huberman, 1994). The interviews of all five administrators revealed that they were evenly divided in their perspectives on implementation, with two having an optimistic view, two maintaining a more pessimistic view, and one describing little effect either way. This made it difficult for me to determine the ways in which these perspectives were influencing

51

implementation thinking and planning. For this reason, I decided to review

what was reported by the implementation-pessimists and compare their

descriptions with those from the implementation-optimistic interviewees,

looking for any outliers providing alternative perspectives. While the data

showed there was great disagreement about many things, there was also clear

agreement about a few things for which there were no clear outliers. By looking

for repeat examples of mutual perspective, and identifying any outliers, I could

be fairly certain that the data was likely accurate (Miles & Huberman, 1994).

Negative evidence. Miles and Huberman (1994) discuss the importance of

looking for negative evidence. After I initially coded the data and began to

identify themes, I eliminated many themes by looking for any data that would

provide negative evidence of the theme. For example, there were a variety of

opinions about the pace and quality of implementation supervision with one

respondent reporting on these topics in a very different light than three of others

while the fifth did not mention the topic at all. I decided not to include anything

about this topic in the findings because the data was so deeply inconsistent on

this matter. It is, however, an important topic that could be further investigated

and analyzed to support the continued implementation of MTSS-PST.

Following up on surprises. Miles and Huberman (1994) describe

"following up on surprises" as a method for testing or confirming findings.

Reflection about the surprises that violate one's theory helps the researcher consider how to revise the theory and look for evidence to support the revision. The entirety of the study's findings represents a set of surprises. Had I created a detailed list of expected findings prior to the interviews, it would be clear that the findings did not reflect my own theories of what was happening as MTSS-PST was implemented in this school. As I mapped the codes into themes, I ended up eliminating all of the themes I expected to find because I often had no more than one or two data points to support the theme. As I tried to identify themes, I was surprised by how many data points I had to support each of the final themes. Doing research in my own backyard forced me to recognize and accept that what the administrators implementing PST were telling me was entirely different than what I thought they would tell me.

The following section reports findings for this study. These findings begin with a description of the MTSS-PST process being implemented followed by a description of the four themes uncovered by the data analysis.

Data and Methodological Limitations

There are a number of data and methodological limitations inherent to this research. First and foremost, the study was conducted in only one school in a K-12 district. The data reflects only one point in mid-year 2 of the school's MTSS-PST implementation process. This means that the data only reflects the

early stages of implementation limiting administrative reflection on the process. The beginning stages of implementation, however, may be of significant contribution because this is when policy implementation is most vulnerable to its context.

The findings may also be limited by the challenges presented when conducting research in one's own backyard even with controls for potential bias. Seeing and understanding this data comes with an intimate understanding of context. It is likely that someone from outside the district would see and understand the data with a very different perspective. Context is an important component in understanding an educational setting (Honig, 2006), and my role as an administrator in the district may have aided in my finding discernible patterns in the data.

Additionally, the same limitations in generalizability common to most cross case study analyses aimed at describing and understanding an event, are true with this study. One cannot read this study and say much of anything about the MTSS-PST implementation process in general. This study is not about producing an "objective truth" about MTSS-PST implementation but is instead the first step in identifying possible patterns in MTSS-PST implementation. The limitation of generalizability is also the strength of this study because it is designed to look at the very thing that is shaping MTSS-PST implementation: the

54

interaction of the people and policy in this one place at one time. This study

shows what is happening with implementation in this one district to help

identify how and why context is shaping the process.

Even with next steps to research for implementation patterns, this study's

findings are limited by the fact that how MTSS is defined and understood in this

district may be very different from other schools outside this district. MTSS-PST

is a framework, and how components are defined and purposed makes it

extremely difficult to use for implementation comparison. Documents and

interviews illustrate that the purpose of the MTSS-PST process is to determine

whether a special education referral for evaluation is made. This purpose, which

is both structural and conceptual, may not be shared in other districts that do not

include this component, thus resulting in MTSS-PST implementation that is

understood in a very different way. This limitation is important to note because

the findings for this study are narrow; they will reveal what is happening when

MTSS-PST is implemented to increase the cost-effectiveness and effectiveness of

special education services in a school district, a topic that is of particular

importance in our increasingly resource-starved public school systems.

Overall, this research is most limited if it is not followed by a linked next

step, such as studying implementation in the other schools in the district which

will deepen understanding how the transactional potential of MTSS-PST became

dominant in the implementation process or by crafting a study to measure the efficacy of the process. Despite standing alone, the findings may inform implementation in either the locale in which the study took place or perhaps in regional school districts working in a very similar swirl of contextual factors. This school district is not alone in the challenges it faces, and study of its decision to take action with MTSS-PST may provide others with important insight about their own process.

Lastly, in each interview the interviewee shared comments that they referred to, and I acknowledged as, "off the record." These agreements, between myself and each interviewee, resulted in additional information about the MTSS-PST implementation process. In each case, the information seemed to be important to understanding the implementation process. The exclusion of this information limits the findings because the entire picture cannot be represented without compromising trust and my integrity. Despite this limitation, the findings maintain their vigor of identified themes none of which were compromised by the "missing" information. What is more likely is that there may have been additionally identified themes, thus narrowing the scope of these findings.

<center>**Findings**</center>

Introduction

   I begin my findings section with a description of the contextual factors

under which MTSS policy was adopted by this district followed by a summary of

the district's MTSS PST guidelines and a description recreated from my

observation of an MTSS-PST meeting. These are included to provide context for

the findings.   The intent of summarizing the PST guidelines and describing the

process as they unfolded in one observation is not to determine the degree to

which the school's implementation is aligned with the district's policy; rather,

the summary and description are provided as evidence of the ways in which the

MTSS-PST process was occurring in one school. Together, they contribute to an

in-depth description and understanding of the PST not an interpretation or

evaluation of the concept itself (Creswell, 2013; Miles & Huberman, 1994).   The

guidelines and vignette explain the "what" of the MTSS-PST in this school.

   My findings include a description of four themes that emerged from my

cross-case analysis:

1. MTSS-PST implementation is understood as an essential component in

  fulfilling the district office's directive to reduce the special education

  referrals with a Multi-Tiered System of Support framework.

<center>58</center>

2. Thinking and planning for PST implementation is focused on reorganizing and improving how the school's support team sorts students for support services.

3. Implementation decision-making is influenced by the relief implementation of an MTSS-PST process provides in comparison to the school's previous approach to the special education referral process and the provision of student supports.

4. Implementation decision-making is influenced by significant challenges in the areas of MTSS-PST planning and resource allocation.

Within the description of each theme, I include quotes and other supporting data to elaborate on the meaning of the theme and any variations occurring within it.

The Larger Context: Adoption of an MTSS Framework

MTSS was adopted in this school district three years before this research was conducted. In September of the year prior to MTSS adoption, the state's education department released its annual special education cost report detailing costs for all districts in the state. A close reading of this report shows that when the school district in this study is compared with two similarly-sized districts, it had the fewest total number of students, the highest percentage identified for

special education, and the highest percentage of spending over the state average

(State Report on Special Education Costs, 2015). Total spending in this district is

between $20,000 and $30,000 per each special education- identified student,

adding $4,000-$6,000 to the overall cost per student for the district (State Report

on Special Education Costs, 2015).

The state's report, made public each year, was an important data point in

a larger statewide effort to reduce school spending that was unfolding

concurrently with this district's adoption of MTSS. At this time, both state and

local education budgets were facing intensifying public pressure to reduce school

spending. School budgets in many locals, including the district studied, were not

passing with the ease once experienced in the state. Signs to pass or not pass

school budgets dominated lawns across the state, and the addition of $4,000-

$6,000 per student because of special education services was likely interpreted by

district administration as problematic.

The same month and year that the statewide spending report was made

public, the district's Special Education Director reported to the district's

administrative cabinet that the district had hired a consultant to review the

district's systems of support, to identify the strengths and challenges within the

district. Seven months later the district announced in each of its schools that

over the coming school year, each school in the district would implement a

Multi-Tiered System of Support. The district then gathered staff feedback about

MTSS, and one month later all staff received two documents: an MTSS "FAQ"

sheet and the consultant's report.

The report was titled "Increasing Effectiveness and Cost-Effectiveness."

District leaders set up meetings in each school to first explain and then

coordinate the implementation of an MTSS framework in each K-12 school. One

month prior to the start of MTSS implementation meetings, building

administrators at the school site in which this study took place, presented a

district PowerPoint show entitled, "An Exciting New Model of Instruction," to

their staff. The first slide in this presentation explained that under the "old

model," there were "no data driven results indicating we have been successful in

reducing Special Education initial evaluations" (District Adoption Documents).

The final slide, of which there are a total of nine, exclaims that the school should

"Celebrate…This exciting new model will allow us to maximize the effort and

expertise of all educators to best serve the needs of all children" (District

Adoption Documents).

During interviews, both building and district administrators explained

that the MTSS framework was implemented to improve the efficiency and

efficacy of student supports, as identified in the consultant report commissioned

by the district. District administration explained, "We had flat line and

decreasing student data…we did not see a decrease in sped referrals. We had an

outside consultant analyze how we manage our resources and give advice that

we were not managing them well."   The reorganization of resources, district

administration explained, began with looking at their model, researching MTSS

"exemplars from around the state and country," and then building their model.

When discussing the reorganization, district administration shared, "that [the

consultants] recommended a content coach for every 6-7 teachers, we would

have to hire like 1 for every 6-7." District administration also shared that the

next step was to "put the manual on the table" and to direct building-based

administrators to follow it, leaving "specific decisions at the building level… left

in the principal's hands," and, "if they have questions they call and ask 'can they

do this and this,' and when they ask, we try to stay close to the articulated

process as we can."

   During the interviews, building administration shared that they had read

the consultant's reports and that those reports detailed a lot of resources needed

to implement an MTSS framework (as is happening in other districts in the state).

Two building administrators shared that the report recommended a year of

planning before implementation should begin and that the district did not follow

this recommendation and never explained why. Speculation on the part of the

administrators was that "implementation was occurring so quickly because of

the money that paid for the report." When discussing implementation, one building administrator shared that as an intelligent person, "reading all of these reports, there is an incredible amount of manpower in making MTSS work, and if we try to fit into a size 9 shoe, but we are really a 13, something will have to give. That is the hard part." Summarizing why MTSS-PST was being implemented, building-based administration reported that they were told to reduce the number of special education referrals. District administration explained this differently, reporting that the central idea behind MTSS-PST implementation is to "assist students with their struggles so that we can catch them early and help them make progress so that they do not end up in special education."

In sum, both the document review and interviews revealed that the purpose of the district's adoption of an MTSS framework was to improve the efficiency and efficacy of each school's student support system to reduce the cost and size of the special education population currently being served in the district. The policy was adopted to reduce expenditures by shifting services towards prevention and away from special education, as the MTSS handbook explains, the framework and the PST is organized "to determine which students may be at-risk for failure or may be underachieving" (Appendix C).

PST Guidelines from the MTSS Manual

The school district's Multi-Tiered Systems of Supports for Academics, 2017, (Appendix C) begins with a brief introduction: "The following guidelines will assist in implementing the MTSS model for academics with fidelity and will enhance consistency across all schools in the district…the key components of the problem-solving process need to be…practiced in each building" (p. 2). The process itself is first described at the end of the Tier 1 description: "if the student makes insufficient progress [in Tier 1], the teacher may refer the student to the PST by utilizing the school's documentation forms" (p. 2). The PST process is described in further detail in Tier 2, "As soon as a teacher completes the documentation for the Problem-Solving Team (PST), Tier 2 may begin…The problem-solving process at Tier 2 begins by collecting data that teacher's document during Tier 1" (p. 3). The manual explains that some of the students discussed by the PST will have participated in an annual standard protocol to identify instructional levels given at the start of the year, and that in the case of students who "do not respond adequately to the protocol and data supports that information, the PST may be consulted to plan an individualized intervention" (p. 4). The manual then describes the following process:

- The classroom teacher completes documentation forms and provides the necessary information from Tier 1 to the designated PST facilitator.

- The designated PST facilitator evaluates the information and assigns a date and time for the PST to go through the problem-solving process to develop an intervention plan.

- The student's classroom teacher determines which specific academic or behavior concern will be the focus of PST.

- The student's classroom teacher will also analyze and collect any data necessary to the initial PST meeting (Appendix C).

The manual then proceeds to explain what should take place during the PST meeting, laying out both an agenda and process for the team to follow:

- The facilitator guides the team.

- The facilitator or the teacher inform the team about the specific concern and what factors are impacting the problem in five minutes or less.

- The team then brainstorms research-based interventions and strategies addressing the concern, this must include:
    o Strategy or intervention

- o Interventionist

- o Progress monitoring tool

- o Monitor

- o Follow up Meeting

- The strategy/intervention must include: the learning environment, what intervention has already been implemented by the teacher, and the result of the intervention.

- A team discussion about what resources are available to provide the intervention to the student.

- A determination of the next meeting date based on the predicted time for intervention success (Appendix C).

If following the Tier 2 intervention the student is not making sufficient progress, the problem-solving team may elect to move the student to Tier 3. The PST process is summarized at the end of the Tier 2 guidelines:

- Teacher completes documentation for the PST.

- Consultation with student's classroom teacher(s) helps to define and analyze the concern.

- The PST meets to develop an intervention plan.

- PST meetings are efficient and focused on the specific, measurable outcome.

- Interventionists implement the intervention.

- Progress monitoring happens more frequently to determine whether the intervention is working.

- Consultation continues after the PST meeting between the student's classroom teacher and the interventionist.

- Teachers and families communicate about student progress and the interventions implemented in the classroom (Appendix C).

At the beginning of the Tier 3 guidelines, it is explained that if a student is moved to Tier 3, "the problem-solving process looks identical to Tier 2, although the intervention and progress monitoring increase with frequency and/or intensity" (Appendix C). The manual's only other reference to the PST is a "Problem Solving Team Meeting Checklist for Academic Referrals" and a "Problem Solving Team Meeting Checklist for Behavioral Referrals" (Appendix C).

Description of a PST Meeting

The following description is reconstructed from PST observation notes taken during one three-hour PST meeting. The meeting involved a review of four students; for the sake of brevity, this description focuses on one student only:

67

The Facilitator, Special Educator, Psychologist, Math Coach, General

Education Teacher and School Counselor were gathered around an area

made up of several smaller rectangular tables that had been put together

to make one large rectangular meeting space. The meeting began with the

facilitator handing out the Problem-Solving Team Meeting Agenda. The

facilitator briefly touched on roles for the meeting, checking in on what

member would take notes in the meeting notes, the EST meeting plan

form, and find the data in the various software used by the school.   The

facilitator then asked the General Education teacher to share student

strengths; the teacher shared from academic data for about five minutes.

The Psychologist added recent assessment scores to this, and the teacher

then shared challenges describing various behavioral descriptions of the

student for another five minutes. The facilitator then asked for behavioral

data, and the teacher shared more from her reading assessment results

while the School Counselor looked up behavioral assessment data. The

team discussed both the academic assessments and behavioral concerns

while various team members looked up more data about the student. The

team landed on an attentional difficulty, and one team member asked if

the student's parents knew about this and whether anyone had ever

suggested to them that the student could be assessed by a doctor using an

Achenbach. The facilitator then asked if the student needed a plan; no one

answered the question with a clear yes or no, and the team did not make a

plan. The facilitator then asked about the student's academics and for a

hypothesis for low math performance as data points in the conversation

revealed this as a specific challenge. The team hypothesized two

possibilities. The first was that the student was struggling because they

leave class for a reading intervention during math. The second was that

the child struggled because of her lower IQ and slower processing speed.

The team reviewed that the student is in a social skills group, is receiving

a reading intervention, and the teacher is paying close attention to her in

class. The team made no plans to address the needs of this student; it was

unclear why. They then moved on to the next student.

Theme 1: A District Directive to Reduce Special Education Referrals

All five of the administrators interviewed in this study reported that their

work to implement MTSS-PST is part of a recent district office directive to reform

the special education process through the implementation of a Multi-Tiered

System of Supports in all district schools K-12. MTSS-PST implementation is

understood to support this directive in three ways: 1) as a process, or gateway,

that will reduce referrals for special education evaluations; 2) as the primary

vehicle for sorting students into the MTSS framework; and 3), as a new and improved team process for developing student support plans within the MTSS framework.

Both district and building administrators referred to the implementation process as first emanating from the direction of district office. Building administrators explained staff were given parameters by central office in a notebook that was put together by district office defining and laying out the MTSS-PST process. District administration described having a procedure that is detailed in a big notebook that includes every part of the MTSS structure, including a defined structure for how the PST meetings are supposed to work along with forms and an agenda. District administrators also shared that they examined exemplar models from around the state and country and then built their model, subsequently giving the manual to building administrators and directing them to follow it, leaving the more specific decisions at the building level. District Administrators explained the implementation process as one in which they provided a manual with the definition for MTSS-PST from which building administrators would work by taking on the responsibility for using the manual to set up a PST process in their building. Building administrators confirmed this description, explaining that the process was described in the MTSS binder as part of the policies and procedures "dictated" by district office

70

with no input from staff or building administrators. The MTSS-PST process was described as a checklist in the MTSS binder provided by the district with the understanding that the PST has to follow this checklist. District administrators described that the PST process is laid out in the notebook and the school's PST should hopefully look like a model from the district protocol.

As one building administrator described it, the purpose of PST implementation was to "move from testing students left and right…because our previous approach did not lower special education referrals." Another building administrator explained that with the previous model,

> We did not see a reduction in special education referrals. We had an
> outside consultant analyze how we manage our resources and give us
> advice that we were spending a ton of money on a model, and kids were
> not getting any additional support from a model on which we were
> spending a lot of money.

PST implementation was seen as part of a shift in special education practice. One building administrator explained, "PST determines who is need of supports, identifying intervention groups" for students, while another explained,

> MTSS-PST keeps kids in the least restrictive environment and gives them
> data-driven interventions in their areas of need. To a lot of parents, this
> makes sense. My kid is struggling so you will give them a boost, and if

they are still struggling, you will give them another boost before we go to

special education.

PST was described by another building administrator as having changed the

determination process for whether "a student needs a special education

evaluation." Explained more specifically by one building administrator,

the teacher is invited to the MTSS-PST meeting, and the team looks at the

data to determine as a team if the student is making progress or losing

ground, and then they decide if a [special education] referral should be

done.

Said slightly differently by another building administrator, the "PST looks at the

data, what is being done in Tier 1 and how a student is making progress in Tiers

2 and 3, and if they are not, it could warrant a special education referral." Again,

another building administrator explained, "We are looking at data differently.

We are not jumping into an evaluation right away."

As a district office administration summarized, PSTs "all have to make

decisions based on data, that there are interventions that need to be tried first

before we offer a special education evaluation." This idea was mirrored by the

building administrators, one of whom explained, "[PST] looks at data and if

there is no progress, it could warrant a special education evaluation." On this

point— that PST is a vehicle for potentially reducing special education referrals

by attempting less restrictive interventions driven by the PST process—the interviewees' perspectives were unanimous. As one building administrator noted, "If data indicates the child does not make sufficient progress after two or three cycles of Tier 3 intervention and after the problem solving and implementing new strategies…the PST may refer the child for a special education evaluation." On this point, while district office administration explained that a teacher is invited to PST to "look at the data and then determine as a team if the student is making progress or losing ground, and then they decide if a referral should be done," building administration explained that, "The teachers see PST as a gateway to getting a kid tested and out of their hair."

Nonetheless, all five administrators echoed descriptions almost identical to this one: "PSTs all have to make decisions based on data, that there are interventions that need to be tried first before we offer a special education evaluation." The purpose of PST, one administrator explained, is to determine: "Do these children need to come back to PST from [an assigned intervention] for PST to determine if the intervention is working, or do we need to start an evaluation?" The only way a determination for a student to be evaluated can be made outside of the PST process, explained one building administrator, is for the parent to refer the student; without a parental referral, all special education

73

referrals must follow the PST process. "All referrals other than those that come from the parent, come from PST."

Theme 2: MTSS-PST Reorganizes and Improves the Student Support Process

The descriptions of the directive to implement MTSS-PST revealed two subthemes about the purpose of implementation and the PST itself. MTSS-PST implementation process was also described as the vehicle needed to sort students and supports within the MTSS framework and as a process that would improve previous school team efforts to develop student support plans.

Subtheme 1: Sorting students into an MTSS framework of supports. Both district and building administrators described that PST implementation was intended to ensure the sorting of students into and through the larger MTSS framework. As one building administrator described, "PST determines who is in need of supports and serves the purpose of identification for intervention groups." Another explained that PST "defines what you need for data more clearly whether in Tier 1, 2, 3," while another commented that the PST process makes "it possible to review students on an annual basis…look at the data and what is being done in Tier 1 and how the student is making progress in Tier 2 and 3." District office administration reported a similar focus, explaining,

> There are regular checkpoints in time whether a student should be moved
> up or down [a tier], and the building PST reviews [the data] and that the

PST comes together to look at the data and…look at whether that student

is making progress and what tier they belong in.

Described by a building administrator,

At the end of each intervention cycle, there is an interventionist meeting,

and we talk about those succeeding and not…those who were not

successful go onto the PST list…if the student is making sufficient

progress, the PST will exit the child from the intervention.

From the perspective of the building administrators, PST implementation

is essential to the larger shift in providing a tiered framework of supports. As

one building administrator explained, PST

serves two purposes, identification for intervention groups and problem

solving for classroom teachers…All students start at Tier 1, if the student

cannot meet expectations a referral is made to PST, data is collected,

interventions are tried, it all goes to PST. We use PST to determine where

kids are.

Similarly, another building administrator explained,

a teacher can say here is my student who is struggling…the PST can offer

supports to be tried…then they come back to PST and say if the student is

not making progress, then they may be moved to Tier 2…if they still show

no growth, they may go to Tier 3…MTSS-PST defines what you need for data more clearly, whether in Tier 1, 2, or 3.

The MTSS cycle of supports, set up to review student progress three time per year, works such that "interventionists and administration identify those students still struggling and put them on the PST list at the end of each intervention cycle." MTSS-PST is where teachers bring students about whom they are concerned and the "PST provides support for the teacher."

Highlighted throughout the interviews was the idea that PST is about making sure classroom teachers have support for their Tier 1 students. "PST…helps problem solve Tier 1 interventions with teacher," or as another explained, "A teacher can say here is my struggling student…. the PST can offer supports to be tried." According to one building administrator, the PST makes sure that "teachers are following the Tier 1 interventions" because they "look at the data on an annual basis and what is being done at Tier 1." District administration explained that the PST "looks at the data and creates a plan for reading and math interventions" in the classroom. In discussing hopes for the future, one building administrator explained that a primary hope for the PST is to have "more tools to share with our classroom teachers, being able to support them with their Tier 1 academic and social emotional needs."

Subtheme 2: An improved student support process. The PST's role in the

new MTSS framework is understood as an improved version of the district's

former student support team: The Educational Support Team (EST). Throughout

the interviews, it was clear that both building level and district administration

were almost unanimous in their description of PST as a new, improved version

of EST. Most telling of this was the use of EST paperwork in the PST meeting.

As I observed, and it was explained to me, one of the PST roles is to type the PST

information into the EST form in the district's software program. As a district

administration explained "If the student is struggling, the PST creates an EST

plan that describes the interventions…and what tier they belong in." The EST

form, explained a building administrator, "makes PST much easier…We follow

the EST process with some additions. The hypothesis, making sure teachers are

implementing Tier 1 interventions." Another building administrator explained,

> The PST reviews students on a 157 plan [an EST plan], as well as putting
>
> students on a 157 plan; all students who receive academic or behavioral
>
> interventions have a 157 plan that is written by the PST and the teacher.

The PST implementation process was described thusly by one building

administrator: "Administration for EST was turned into the administration for

PST." As district administration explained, "the PST is the problem-solving

team. Some people still call [their team] an EST. It is the same concept."

77

The PST, however, was described by district administration as an improvement on the EST. "It is tighter; we pay closer attention to the data, and student results and outcomes…teachers are not hanging out there on their own having to make decisions on their own." A building administrator made a similar comment,

> what is different is that the data is collected differently, and student data is reviewed more often than it was [with the EST]. There is actually an analytical process to it that I did not see before we started [MTSS]…we are making more data informed decisions than we used to.

The PST process, however, was noted as improving the EST process, because it is part of the larger MTSS framework and as a building administrator noting that with MTSS there are "interventionists to send kids to…before PST we felt our hands were tied. There was nothing to offer during [EST]. Now we have more to offer."

Throughout the interviews, participants expressed the implementation process as both a burden and a relief. As they described how they conceptualized the process of PST implementation, they revealed time and again that the decision making of implementation was impacted by the challenges and relief of this new approach to supporting students.

Theme 3: Implementing is a relief

A key finding was that the interviewees viewed implementation of MTSS-PST in a generally positive light. None of the interviewees reported the district's reformation through the implementation of an MTSS framework as problematic or wrong-minded. In fact, there was a unanimous mention of hope and relief about MTSS-PST implementation. As one building administrator noted, "Before PST, [the EST process], there was nothing to offer…now we have more to offer… [and] we are making sure the right person is at the table for PST conversations. It is [now] very systematic and on-going." Similarly, another building administrator explained,

> There is actually an analytical process. I did not see this before we started.
> [MTSS-PST] brings students to the forefront when they are in need of
> Support, and we are making more data-informed decisions than the
> cardiac assessments we used to make. During PST meetings, the data is
> brought up and presented, so anyone's questions about student scores can
> be looked up.

A third noted that a data presentation given to school staff during the first year of implementation "showed how many kids were making gains in ways they never had. Goals for IEPs had to be rewritten because kids were making a years' worth of progress in two months." Lastly, one of the building administrators

exclaimed about the first year of implementation, "We saw so much progress, it was pure joy."

Overall, administrators both in the building and in the district office reported experiencing relief from PST implementation; as district administration explained, now

> We pay closer attention to data and student results…prior to this, we knew kids were not getting the help they needed…[and] now we have staff to support struggling students. We did not have a defined process to articulate when you help students.

There was no evidence of any kind that building or district administrators were critical of the goal of implementing MTSS-PST. In fact, building administrators explained that PST brought them relief from the ways in which they were previously working to support children. "We have worked really hard from where we were." PST is now "connected with all other school policies." There was consensus that MTSS and the PST process is better for students; one building administrator explained a sentiment that was echoed by the others that "Kids were making gains in ways they never had …students are bought to the forefront." District office explained the same. "We now have a defined process to articulate when you help students or how long you help…the success of the

first year showed very good results." Explaining further, district administration reported, "This has been more effective than the way they had it before."

The MTSS handbook does include time frames for interventions at Tiers 1 and 2, as well as universal screening assessments. There is also specific language that defines how to measure progress and an MTSS flow chart that delineates what steps to take when. My understanding, though gained outside the scope of this research, is that the data-monitoring for student supports was not defined previous to the school district's adoption of an MTSS framework. Similarly, I understand anecdotally that the supports provided prior to MTSS were poorly defined and inconsistently available.

While there was a unanimous feeling of relief produced by the implementation of MTSS-PST, building and district administrators reported feeling challenged by the implementation process, particularly in the areas of (a) planning, (b) technical support, and (c) resources.

Theme 4: Facing the challenges of MTSS-PST implementation

While building and district administrators described and explained the relief they experienced from the district's adoption of the PST process, and the ways in which the process plays a positive and essential role in the MTSS framework, each building administrator identified that implementation has been

challenged by needs in the areas of planning, resources, and technical support. In some cases, district administration shared similar concerns.

Building administration shared feeling rushed, explaining that PST planning and implementation occurred alongside many systemic changes in school practice as the MTSS framework unfolded. For some, the concerns were very specific. "[We] are not sure what to do when a referral to [PST] is not chosen," and another, "The PST team is still trying to figure out how to determine whether a student is making adequate progress." For one building administrator, "Unfortunately [MTSS] was adopted with requirements which make scheduling impossible" and for another, we were "told to figure it out." To another building administrator, the MTSS-PST implementation process,

> was dictated abruptly…with not a lot of planning, yet reports said it takes a year of planning… [It] takes time to develop your MTSS process, really look at each step, each tier and what you have in place for putting together the process.

One building administrator noted it was the number of changes happening at once that was difficult.

> We started off by taking the whole thing at once, we defined each tier, but I do not think we really looked to see what we had available. We made a lot of changes in one year…we do not know which one made a

difference.

Building-level PST implementation decisions, one building administrator explained, "were made based on the number of changes that were happening."

District administration on the other hand, described implementation planning as more collaborative and supported. "We created a team to review [MTSS] models and as a team with teachers and administration, we pulled pieces together; we paid additional teachers to review the model and give us feedback." Further, district administration explained, there were

> regular meetings with interventionists led by coaches, the school
> leadership team, or an outside consult to try and make sure
> interventionists were getting what they need. We asked them via google
> doc what they needed to be successful. In addition, the administrators
> were tracking challenges and successes in the classroom.

District administration also reported, "We have worked with the administration with what it is, how we can implement it, problem solving with them, meeting with them, trying to support them, identifying their struggles."

Building administrators and district administration both reported not having the needed resources of time. One building administrator described wanting "time to investigate, to get better, we need time to meet longer and…to organize to go into meetings." Time, one explained was being denied by the

district, "[We] keep asking for an early release to do all of the data meetings." While another building administrator described "that the reality is we are running around with our heads cut off." District administration noted a similar concern, explaining, "We need to figure out how to extend our day…there is not enough time in the day…it is a real puzzle."

A lack of time was also noted as a reason for limited parental engagement with the PST process; as one building administrator explained, time is so limited that "rarely will a parent join PST. They are not invited. That would be ideal, but we just have too many students to review, and we don't have exact times for each." The time scarcity was also reported as affecting the review of data for the PST meetings. As one building administrator explained, "you need an enormous amount of time to review data. The team wanted seven days." Another building administrator shared that "the time it takes to pull all of the data can be frustrating." District administration also reported that limited time impacts the PST process. "It is busy. I think they spend less than 30 minutes per kid with over 500 kids in the building."

A lack of staffing resources was also frequently cited when describing what was needed to implement the MTSS framework that supports PST decision-making. As one building administrator explained, that while "PST can offer supports, it depends on if there is room in intervention. If there is no space

available, [students] do not automatically get into the next cycle." As one

building administrator shared,

> There is room for improvement. Our approach is due to a lack of capacity
> (because) we are not providing the level of intervention that we
> should…there is no difference between Tier 2 and 3, the same amount of
> time…the same number of days, which is a capacity
> issue.

This problem was identified by two building administrators as having yet to be

solved by the school or district. A building administrator explained that time

and staffing make it difficult to implement: "We are given portions [of staff] and

that is what makes it challenging…and there are also contractual agreements."

One building administrator reported that, "The biggest [need] is looking at the

number of students who need intervention that we cannot provide."

Two building administrators explained that staffing was also interfering

with their participation in the PST process. The building administrators all

identified that only one of them goes to the PST meeting; the other two have

never attended a PST meeting because of time and staffing limitations. As one

building administrator explained, one building administrator is in "PST all day.

[they] are already in meetings 3-4 hours a day and then they have only 1 hour

left for anything else." Another remarked, we need time to "expediently

respond or process PST referrals." One building administrator explained, "I have never been to a PST because of scheduling. We had to add people to the meeting but then we lose people elsewhere." Another explained feeling frustrated by not being able to attend PST meetings:

Frustration because you can't be a part of everything in a school this size. You have to have different people doing different things because of size and number of students, but if you are not part of it, how do you know what is going on, and that is frustrating. Sometimes I do not know what is happening with PST and student progress, or I find out a student went to PST and a decision was made about evaluation, and questions that I pose no one else asked, and so it was not taken into consideration, and these questions would make an impact on decisions being made.

For one building administrator, implementation of the PST, overall, was impacted by the decision to assign only one building administrator to the meeting;

I am not [at PST], and I did not make any decisions about PST. That was done between [one administrator] and the counselors who attend… questions about logistics were [between the one administrator assigned to PST] and teacher leaders. For example, the decision to have a sped at PST

was up to us, but the details were decided by the administrator and the teachers.

District administration similarly reported challenges with staffing resources. "We do not have enough staff to adequately implement the process, we need more interventionists for behavior and academics…resources are needed, we have half as many interventions as we need." District administration explained that "resources are needed for what [was] recommended," which is different than what is being done now. If the recommendations were followed, "we would lose families to pull off the model" because following the recommended model would require either adding staff or increasing class sizes to make staff available to fill other roles; these options were described by District Administration as not feasible, even though they reported there is a need for more "time, money and people, more interventionists so we could implement the schedule." District administration explained that community pressures, transportation limitations, and union agreements limiting instructional duties, all hold the district back from complete implementation.

While there was no uniformity in exactly how implementation could have been improved, there was some commonality in what was missing from the process. One building administrator shared that more time was needed before the overall system was unveiled, while another explained that school staff were

not included in ways that are necessary to implementation success. Still another described the process as being foisted upon them by the district with little opportunity for feedback about the implementation process and leaving out critical steps in how one unveils a new approach to teaching and learning. Building administration also reported feeling left on their own to figure out what to do and that there was little in the way of supervision to guide the implementation process.

Building administration's experience of implementation suggested that while the MTSS-PST process is valued in comparison with the district's previous approaches to special education and student supports, the implementation process did not adequately address the planning, resources, and technical support needed for implementation. Nonetheless, no one interviewed suggested that implementation should stop or should not have started. The purpose of both the MTSS-PST process and the MTSS framework made sense to building administration, but they wanted a better plan for implementation—one that included more time, staff, and supervision, to support the process.

The following discussion is organized to answer and reflect on the research questions at the heart of this study. It begins by addressing the two research questions and the application of the policy implementation concepts described in the literature review. It then turns to a discussion of unexpected

88

findings, the overall implications of this study, and finally to methodological limitations.

Discussion and Conclusions

This study set out to answer two questions about the implementation of complex educational policy: 1) How do the building-level administrators for one New England elementary school conceptualize the process of implementing school district MTSS-PST policy?; and 2) Why are the building-level administrators in one New England elementary school making their specific MTSS-PS implementation decisions? This section is organized to answer and reflect on these research questions, beginning with how administrators understood and made decisions about MTSS-PST implementation. This is followed with a discussion about what these findings reveal about the implementation of complex educational policy like the MTSS-PST process. I then turn to unexpected findings that surfaced as I analyzed the data, and end with a discussion of the implications of this study.

Empirically, findings from this study show that building-level administrators understand the MTSS-PST implementation process as a systemic approach to reducing special education referrals by improving how school staff engage in decision-making and planning for student supports. To this end,

implementation decision-making is focused on how to bring this improved

student support process to scale to reduce referrals for special education testing

through placement of students in the most beneficial MTSS tier of support.

Implementation decision-making is influenced by the district's directive to

implement MTSS while not providing the necessary resources to do so. At the

same time, building administrator's decision-making is influenced by the relief

they experience from how the MTSS-PST process is already improving how the

school supports under-performing students.

The conceptual contribution from these findings is revealed through the

application of Honig's (2006) interactive framework for *Dimensions of*

Contemporary Education Policy Implementation in Practice and Research to

understand the ways in which implementation thinking and decision-making is

impacted by the variety of interactions between people, policy and place in this

school setting. Applying Honig's (2006) implementation framework to the

findings made it possible to dig deeper into the forces at play in the MTSS

implementation process rather than by qualitative theme identification alone.

This framework, paired with the implementation concepts of sense-making and

bridging/buffering (Honig & Hatch, 2004; Spillane, 1998; Spillane et al., 2002),

revealed factors shaping how these administrators were thinking about and

planning for implementation despite their not specifically identifying them.

90

Taken together, the empirical and conceptual findings make sense when they are placed within the larger context of the school district. The adoption of MTSS in a district that had been identified as a high-spending school district for special education services and had commissioned a consultant's report detailing the cost-effectiveness and effectiveness of student support services, is an important contextual factor shaping the overall implementation process. Building administrators were tasked with reducing referrals to special education by reorganizing their student support system. The purpose of MTSS and MTSS-PST, as understood by these building-based administrators, was to provide academic and social-emotional interventions at an earlier, less costly, potentially more effective point in a student's schooling. That district and building administrators were thinking and making decisions focused on instrumental change within a transactional leadership approach is not so surprising. The original purpose of the policy, as understood by administrators in this particular district, was rooted in improving the efficiency and cost-effectiveness of special education services. The MTSS-PST implementation process, in turn, was thus shaped by these contextual factors.

Despite the ways in which the findings reveal that thinking about and planning for MTSS-PST implementation was to improve the efficiency and effectiveness of the school's support services, and reduce the high-costs of special

education services, I was surprised that interviewees unanimously described efficiency or efficacy without also describing the transformative potential of the MTSS-PST process. I wrongly assumed that my findings would, at a minimum, include reference to the ways in which their implementation work would shift how the system and staff would conceptualize the purpose and practice of schooling. Simply put, I expected that MTSS-PST was understood and planned for as a transformative act.

Research Question 1: Conceptualization of the MTSS-PST Implementation

In addressing my research questions, I turn first to the data to describe the interviewees' conceptualization of the MTSS-PST framework and implementation process. It was evident from their reflections that these administrators viewed PST implementation as both a directive and an opportunity to reduce their special education referrals, place students into their school's MTSS framework, and to improve the development of student support plans. The findings are important because they describe what happens when school administrators implement an MTSS framework at the building level. The literature describes the MTSS framework and the PST process as a core feature in providing schools with a mechanism through which they can identify and respond to student learning needs by determining what intervention can be applied to improve learning outcomes, and in so doing, change the teaching

92

practice to solve the identified problem (Deno, 2010). The MTSS-PST process is prevention-oriented; data is collected and used to determine the level of intervention needed by students who are not learning at their grade level (Cook, Burns, Browning-Wright, & Gresham, 2010; Eagle et al., 2015; Gamm et al., 2012; Strein et al., 2003). The findings of the current study illustrate that these administrators conceptualize a PST process that does just this. They articulated an understanding that the PST is designed to preventatively address student needs, and thus reducing the need for special education referrals.

The study highlights the ways in which the research literature's description of the MTSS-PST process may differ from implementation at the building level; conceptualization of implementation was focused on the instrumentality of building administrators' work to support students with little to no reference to the literature's focus on the transformative purpose of a PST process or the MTSS framework (Algozzine et al., 2014; Eagle et al., 2015; Deno, 2005; Doll et al., 2009; Tilly, 2008). Implementation for these administrators was about getting better at what they are already doing.

Building administrators also described their implementation as focused on both the academic and behavioral needs of students, which again is consistent with the idea of MTSS and by extension MTSS-PST, as a framework that integrates the approaches of both RtI and PBIS (Cook et al., 2015). Their

understanding was thoroughly consistent with the research literature's description of PST, in terms of PST membership and purpose (Algozzine et al., 2014; Deno, 2005; Dulaney, Hallam, & Wall, 2013; Tilly, 2008). In each of these ways, the study's findings suggest that building administration's understanding of the MTSS-PST process is consistent with the research literature.

Research Question 2: The "Why" of Administrators' Decision-Making

Descriptions of why the PST decisions were being made was less clearly articulated by administration. While they described implementation of MTSS-PST as an improvement over previous systems for addressing student supports and the special education referral process, they described implementation decision-making that was thrust upon them with little time to plan or freedom to adequately shift staffing and resources. The description of planning and the associated decision-making of the building administrators was described as "rushed," "a quick process" defined in a notebook, with "no input from staff or administration." Building administration explained that the PST process was described in the notebook; how to implement it was decided when building administration assigned one administrator to the PST meeting, and that administrator became the implementation decision-maker. The building administrator leading the PST implementation decision-making did not explain how decisions were made, rather defining the work as done in close coordination

with a school counselor, thus turning the EST process into the PST, with some additions. It is an implementation process that this building administrator describes as still unfolding, although the MTSS manual does articulate the process. There was little descriptive data from this study about the factors that contributed to the implementation decision-making approach.

Building administration were told by the district to "figure it out," while district administration described a collaborative decision-making process. The building administrators described sitting down and making decisions on their own, talking as a building team about how to implement PST by taking some of the process to staff meetings for review, and in other cases, finding ways to implement PST using the structure of the school's previous support-team meeting. District administration, however, shared that they were open to answering any and all questions that arose as the building administrators tried to implement, adding that district help was focused on maintaining allegiance to the process articulated in the MTSS manual. Overall, building and district administration described different experiences with the degree of collaboration and support provided to building administrator's implementation process.

When citing specific reasons for what impacted their PST decision-making, building administrators said they were challenged by the need for more resources. They voiced the opinion that there was not enough time from the

95

district to plan for implementation decisions, and that limited time and staffing in the building drove implementation decisions. It is unclear to what degree the building administrators agreed with the implementation decisions they were making; interviewees talked more about the process than the quality of their decisions. When asked during the interview what they would do if they had a magic wand that could affect their implementation decision making, three of the five administrators who answered the question— at both the building and district level— explained that resources in time to plan and support the PST process were singularly important. The interviews also made clear that the building administrators made their decisions based on their understanding that implementation needed to happen quickly. In addition, they could ask for district administration feedback about these decisions, and both the MTSS manual and existing systems of support should be incorporated into their decision-making process.

Given that there is no research explaining how to best approach MTSS-PST implementation decision-making, it is difficult to fully analyze these findings. When compared with educational implementation research in general, however, the research is unanimous that careful implementation is warranted with the implementation of a PST, the effectiveness of which can be negatively compromised by the implementation process (Burns, Peters, & Noell, 2007).

Similarly, Fixsen et al. (2005), explain that systems innovations require an implementation approach focused on how it is converted into practice settings. While there are few organized approaches to implementation decision-making, there is consensus in the research literature that effective post-implementation results are built upon sustained attention to an organizing framework and set of implementation concepts and/or strategies to guide the decision-making of implementation agents (Eagle et al., 2015; Fixsen et al., 2005; Honig & Hatch, 2004; Spillane et al., 2002). Building and district leadership engaged in systems-level change like MTSS requires an approach to the scaling-up process that is collaborative and focused on all aspects of the change process (Eagle et al., 2015).

The limited research that does tackle the implementation of MTSS points to a need for implementation supports as there can be numerous barriers that can interfere with both uptake and sustainability when the framework is implemented (Cook et al., 2015). Writing about the implementation of RtI, one of the precursors to MTSS as a systemic approach to improving students' academic outcomes, Hollenbeck (2007) explains that there are a number of structural and organizational decisions that need to precede implementation, including an assessment of fit between the new organizing system and the school, including "minor" issues such as the allocation of time and space resources, to the more significant such as providing in-service training and establishing competencies

across professions. Mandating change is not enough; it must be accompanied by a deep understanding of what it takes to move the system from point A to point B, thus alleviating some of the challenges to changing practice (Hollenbeck, 2007).

A number of contemporary educational implementation research concepts identified prior to the collection of data for this study, provide additional insight in understanding this study's findings. These include concepts set forth by the research of Honig and Hatch (2004), Honig (2006), Spillane (1998), and Spillane et al. (2002).

MTSS-PST: The Implementation of Complex Educational Policy

In the edited collection, *New Directions in Education Policy Implementation*, Honig (2006) writes that contemporary policy implementation research aims to uncover how and why interactions between policy, people, and places shape implementation in particular ways. Policy implementation researchers, Honig (2006) explains, "…aim to uncover the various factors that combine to produce implementation results and to accumulate enough cases over time to reveal potentially predictable patterns" (p. 20-21). Further, policy implementation research is not about developing a universal theory but about using theory to "illuminate how particular dimensions of policies people and places come together to shape how implementation unfolds" (p. 21). The conceptual

98

framework outlined to explain this approach is described as, "Dimensions of contemporary education policy implementation in paractice and research" (p. 14). Upon completion of a thematic analysis of the findings, I returned to Honig's (2006) framework to make better sense of the data and about the implementation process. As I read and reread through Honig's (2006) work, I realized that conducting a secondary analysis of the data was needed if I were to fully explain what was happening in this school.

Interactions between people, policy and place. A review of MTSS-adoption documents and portions of the interviews revealed that implementation of the policy was nested within a larger set of interactive contextual factors that shaped adoption of the policy itself. These included the district's ranking in the state as one of the highest spending districts for special education (when compared both across the state and with similarly sized districts), state and local pressures to reduce school budgets, and a consultant's report detailing the ineffectiveness of student support spending and services; these occurred within a federal and state policy environment endorsing implementation of an MTSS framework. This complex swirl of interaction between the people, policy, and place fostered adoption of an MTSS framework that addressed the needs of the district's support services.

99

As shown in Figure 1, I focused a secondary analysis on "fleshing out"

Honig's (2006) framework with data from the interviews. I reviewed the data I

compiled and set out to develop a summary list at each policy-implementation

interaction point: People, Policies, and Place. This work is displayed in Figure 2.

The first set of interactions in the framework occurred between MTSS-PST policy

and the building administrators; the second set took place between the MTSS-

PST policy and the site, an elementary school in New England; and the third set

occurred between the building administrators and the site. I reviewed the

interview data and attempted to list summary information at each interaction

point. The next step was to review the list at each point and ask myself if these

lists, when taken together, could plausibly explain the thematic findings I placed

at the center of the framework.

Figure 1: *Adaptation of Honig's (2006) Dimensions of contemporary education policy implementation in practice and research*

Building and District Administrators

Interaction 1
A. Technical definition is understood by all in same way
B. Purpose is uniformly agreed to, liked and understood by all in the same way
C. Fits with cognitive schema for data/accountability
D. Fits into cognitive schema for support team meeting
E. Part of changes that created quick results in the first year
F. Rushed directive to implement with little understanding
G. One part of much larger policy implementation

Interaction 3
A. Change was needed; Proof of this was first year
B. Scheduling/staffing difficult to change
C. Student needs are big
D. History of POOR implementation- Co teaching
E. History of over-identification for sped
F. A lot of restrictions on admin change agency
G. Fits with what is already known

MTSS-PST (policy)

Interaction 2
A. Lack of resources/Capacity
B. An easy piece within a lot of quick change for one place
C. Can be done by only 1 admin
D. Fits with idea of school sorting
E. Fits in with paperwork/meeting systems

A New England Elementary School (context shaping what people can and will do)

In doing this, I knew there was no way I could prove that my analysis was "right or wrong" but that I could make sure that every item in the list was grounded in collected data, and I would likely notice if there was a big difference between the likely outcome of these interactions and the themes I identified in my analysis.

As Figure 2 shows that implementation of MTSS-PST policy at the building level is shaped by a significant number of interactions that multiply

101

when the three interaction points combine producing an implementation process in which there are as many as 70 co-occurring interactions! When I compared the plausibility of such interactions with the thematic findings, I deduced that it is plausible to identify MTSS-PST implementation thinking and planning as transactional in nature. Application of this framework to the findings further revealed that the building administrators' focus on transactional change-making made more sense than if there had been evidence of transformational change-making.

After analyzing the data in this way, I then set out to review how the application of two additional implementation concepts, sense-making (Spillane et al., 2002) and bridging and buffering (Honig & Hatch, 2004), would reveal what was happening in this school.

MTSS-PST Implementation: Sense-making

How these building administrators think about MTSS-PST implementation is consistent with Spillane's (1998) articulation of sense-making and how it impacts local administrators charged with implementing educational policy. Implementation was explained and described as a new or improved approach to the former educational support team, the EST, as well as being a way to sort and determine testing needs for students. Within an MTSS framework, there are two central duties of a school administrator: to organize

how academic and social emotional instructional services will be determined and to then organize the process for how students will be matched with an appropriate service within the school's instructional framework. It is not surprising then that the MTSS-PST process is understood as a variation of what is already understood as the work of building administration. There was little to no evidence that these administrators think about MTSS-PST as a shift in understanding of how schools think about challenges to student learning as a product of the environment or context of learning rather than an intra-child pathology (Brown Chidsey, 2005; Deno, 2005; Spillane et al., 2002; Tilly, 2008).

"What a policy comes to mean for implementing agents depends to a great extent on their existing knowledge and experiences" (Spillane et al., 2002, p. 393). Making sense of a policy is an active process in which implementers' understanding of a policy is guided by their application of prior knowledge to the new idea or event (Spillane et al., 2002). The schema, or internal knowledge structures that link together to make sense of the world are dynamic and contribute to an individual's construction of mental models that encode biases, expectations and explanations, and about how people think and learn (Spillane et al., 2002). A building administrator's already existing mental model influences what they understand when facing reforms in schooling practices, and it is difficult to shift mental models without restructuring a complex suite of schemas

(Spillane et al., 2002). In the absence of a process to restructure knowledge structures, implementation is likely to highlight minor variations of what is already known rather than underlining the critical differences of the new policy (Spillane et al., 2002).

The transformative potential of the PST is attributed to the problem-identification stage of the process in which the team identifies the "problem" that is getting in the way of student learning (Tilly, 2008). Brown-Chidsey (2005), Deno (2005), and Shinn (2005), explain that the PST process can shift school staff from examining intra-child pathologies to emphasizing the ways in which the context of schooling is negatively impacting learning. Thinking about the PST process in this way was not identified by interviewees, although during the MTSS-PST observation, the PST did identify that a student was struggling with math because they were pulled from math class for their reading intervention. Despite this recognition, the PST focused on identifying what was wrong with the student—a low processing speed or overall low IQ—while setting aside the ecological problem.

My analysis of the data, including the secondary analysis involving application of key implementation concepts, suggests that in this district, implementation of the PST has not resulted in a shift in how staff made sense of students' learning problems. The PST process seemed to bring clarity to the way

in which data were used and the efficiency of data-based decision-making; it did

not alter team members' perspectives regarding the source of learning problems.

Although some ecological solutions were briefly identified, team members

continued to see learning issues as coming from within the child. Similarly, there

was no evidence that PST implementation was stretching the thinking and

practice of teaching and schooling in fundamental ways (Mehta, Schwartz, &

Hess, 2012; Tilly, 2008).   The MTSS-PST implementation process occurring in

this school appeared to be aimed at a more specific set of activities and aims,

including reducing special education testing, placing students into tiers, and

improving the school's student support team, all of which were noted by

building administration as much needed improvements but none of which are

noted in the PST literature as reasons why the process can be transformative

(Deno, 2005; Rubinson, 1996; Zins & Ponti, 1996).

The PST's transformative potential is described as the product of the ways

in which the process asks staff to reform how they think about learning

challenges; rather than thinking of a problem as inherent to the child, learning

challenges are instead inherent to the environment of the school (Deno, 2005).

Doll et al. (2005) describe how the problem-solving process may be impacted by

the incompatibility between staff's belief that problems are caused by

characterological deficits instead of ecological ones.

Rubinson (2002) explains that a PST can fundamentally reshape the practice of schooling, yet the findings in this study suggest that school staff continued to describe and attribute students' learning problems to those residing within the student and/or the student's family. The likelihood of school staff engaged in a problem-solving process, and attributing learning problems to the child instead of the learning environment, is established in the research literature (Rubinson, 2002). Shifting this approach to problem-identification may require significant training as the attribution of the problem away from the child/child's home may be resistant to change (Zins & Ponti, 1996). In the absence of such training, Zins and Ponti (1996) found that the ways in which staff identified the problem of learning challenges, or using the language of Spillane et al. (2002) made sense of them, was to underestimate the contributions of classroom, organizational, instructional, or other teaching-related factors.

MTSS-PST Implementation: Bridging and Buffering

Honig and Hatch (2004) explain that implementation of educational policy at the school level is shaped by the ways in which administrators negotiate the fit between the policy and the school. Implementation of policy is an interaction between administrators inviting or limiting (or bridging or buffering) policy mandates from a central office. Analyzed in this light, the study's findings show that these administrators are overwhelmingly engaged in bridging activities and

106

accommodating the policy demands of MTSS-PST through structures directly

aimed at meeting policy goals (Honig & Hatch, 2004). They describe MTSS-PST

as a relief providing them with a mechanism to determine interventions, reduce

special education referrals through prevention, and to sort students according to

need. There was no evidence of the MTSS-PST policy as a policy they are

resisting or buffering. Any descriptions of difficulty with the policy were

entirely focused on the need for additional resources in personnel and technical

assistance. This overwhelming attempt to bridge to the policy is not surprising

considering that two of these administrators are special education teachers and

two are special education administrators for the building.

While administrators' understanding and planning for PST

implementation is not focused on transforming the core practices of schooling,

there is little to no MTSS-PST buffering—or at least none that they are either

willing to share or that I could observe. Every interview included requests to

speak off the record about implementation leaving particular opinions or

experiences outside the data set for this study. It is possible that buffering

activities have unfolded during implementation; Honig and Hatch (2004) explain

that buffering is not the blind dismissal of policy (for which there was no

evidence in this study) but rather strategic engagement that limits policy

demands. This can look like a symbolic adoption of a policy, or a first-order

107

change, leaving daily functioning untouched. Interviews and observation

indicated that implementation of the PST process may be buffered by

administrator's decisions to inhabit the skeleton of an EST meeting and by using

the EST forms and improving the process with the addition of a problem-

hypothesis and data.

Unexpected Findings: Transactional vs Transformative

Of the findings presented, the most unexpected was the degree to which

the interviewees understood and planned for PST as a transactional rather than a

transformational change in school practice. Transactional change refers to the

modification and redesign of the systems and processes in which individuals

interact (Henderson, 2002).   Transformational change in an organization goes

beyond reshaping and fine tuning, fundamentally shifting a culture by

producing a radical change in how people perceive, think, and behave

(Cummings & Worley, 1997; Henderson, 2002). Given the ways in which the

MTSS framework departs from the historical construct of schools as places where

learning is organized by classroom grade and a student's biological age, I

expected to find the MTSS-PST process to be understood and planned for as a

similar shift in fundamental thinking about students.

The explanations and descriptions of the MTSS-PST process provided by

the administrators interviewed in this study did not include any mention of

concepts or efforts to shift thinking or behaviors beyond an improvement of what already existed. The positive comments that administrators made regarding changes in the MTSS-PST processes focused on the ways in which processes already in existence (e.g., data informed decision making, a support team to discuss why a child was not learning, and an increase in efforts prior to the special education referral process) were improved following implementation. Their statements about the outcomes of implementation align with typical descriptions of transactional practices that reshape and fine-tune prior practices, and while there are new roles and responsibilities in an MTSS-PST meeting, there was no evidence that administrative perceptions of schooling were fundamentally changed during implementation (Henderson, 2002).

Further, interviewees reported that MTSS-PST was an improvement because it was more efficient when data was centralized, and there were now intervention groups to whom the PST could refer students whereas before there were very limited supports. Amongst the administrators at both the building and district level, the purpose of their MTSS-PST implementation was to refine the process for special education referrals and to bolster the school's support framework. There was no evidence that the reported lack of resources in time, staffing, and planning were interrupting or preventing the transformative potential of MTSS-PST to shift and stretch how staff think about students and/or

the system of schooling. When asked what the meaning or purpose of MTSS-PST was, the responses were unanimously focused on meeting outcomes earlier and in less restrictive ways. What remains unclear is whether a longer implementation-planning period focused on a deep understanding of MTSS would have shifted these administrators towards transformational thinking and decision-making.

There were no references made to the potential for the PST process to help reshape schools into places where the school and/or teaching practices become the problem to be solved nor as a process whereby schools recognize and address that their structure or processes are what interfere with student learning. Rather, the "problem" continued to be identified as the student or the student's home life. There was no evidence that the administrators were engaged in MTSS-PST implementation to change the organizational culture beyond the reduction of special education as the primary intervention system, nor did anyone report the PST as a fundamental shift in solving learning problems. Implementation of the PST was about improving the efficiency and efficacy of their current core mission: to raise all children to grade level proficiency with greater efficiency and reduced costs.

Summary of and Reflection on Findings

Given the larger context in which MTSS implementation unfolded, it should not be surprising to find that the change was unanimously referred to and valued for the efficiencies and improved processes that resulted from its implementation. The adoption of the policy was likely the product of pressures to reduce special education spending at a time when school budgets across the state were being scrutinized. The timing of MTSS adoption alongside a state spending report and a locally commissioned report reveal that from the beginning MTSS implementation was a response to what building administration described as lack of "data driven results indicating we have been successful in reducing Special Education initial evaluations."

Using Honig's (2006) model of interactions between the policy, people and place shaping the implementation of complex educational policy, I found there were a minimum of 70 interactions shaping MTSS implementation in this one school. With so many interactions affecting this work, it should probably not be surprising that these administrators unanimously conceptualized implementation in transactional terms. Focusing their efforts on the fine-tuning of effectiveness is likely a less daunting prospect than fundamentally shifting a culture through a radical change in how people perceive, think, and behave. Nonetheless, given the research literature's strong calling for the transformative potential of the MTSS framework and its central problem-solving process, I was

111

surprised that the potential for transformative change was not mentioned by any of the interviewees. This causes me to wonder whether MTSS implementation can impact the district in the fundamentally long-term ways for which it is designed.

If the purpose of the framework is to transform the organization of schooling into a more flexible and responsive environment, it seems appropriate to ask whether an implementation process rooted in transactional changes alone is enough. This dilemma recalls the wisdom of the feminist scholar Audre Lord (2018) when she declared that inequity cannot be disrupted using the logic that justified inequity. The quest for efficiency in schooling is not a transformative stance but a continuation of an age-old theme of public education. While attention to costs—maximizing instructional efficacy and the flexible use of resources— is an essential component of public schooling, public schooling is in need of transformation.

Raising outcomes for all students will likely require the dismantling of the system's proto-industrial approach to teaching. We will need to shift its limited definition of professional roles, rigid hierarchical structures, and its narrow set of learning objectives by transforming how we understand and make decisions about teaching and learning. The PST process that grounds the MTSS framework does this by redefining the problem as the environment, not the

112

child, and asking a variety of staff members to come together to review learning data and shift practices to account for the child's needs. This is a significant departure from public schooling's practice of identifying the problem with the child alone, leaving the practice of teaching and school environment unaltered. Shifting such thinking requires an explicit commitment to the transformative nature of MTSS-PST because the obstacles to students' achievement are the result of more than inefficiencies in Special Education services. The question for school district leadership is how to keep the transformative potential of MTSS central to the implementation process without losing sight of the bottom line. Attempting to answer such a question may help building-based administrators not only reduce referrals to special education but also achieve the meaningful and much-needed shifts in how schools approach the process of educating children to meet academic and social-emotional outcomes.

Implications for Practice

The MTSS framework is currently being implemented in school districts around the nation (Averill & Rinaldi, 2011). It is considered the next step in bringing PBIS and RtI together to provide a more efficient and cost-efficient support system to increase student success in meeting educational outcomes (Averill & Rinaldi, 2011).   The PST is conceptualized as the support team that is central to an MTSS framework in making it possible, at a minimum, for schools

113

to effectively solve problems that are preventing students from meeting outcomes. At a maximum, it is the vehicle that helps to reformulate and transform the ways in which schools organize teaching and learning (Tilly, 2008).

This study contributes to the practice of MTSS-PST by providing an enlarged understanding of how MTSS-PST can meet the first intention of providing schools with a more efficient and cost-effective organizational framework for student supports, and at the same time not wholly address transformation of the system. From the perspective of building administrators tasked with MTSS-PST, this study offers insight into the ways in which a school's local context may affect their implementation of complex educational policy. Both the empirical data and the adaptation of Honig's (2006) model illustrate several factors that building and district administration may want to consider as they implement MTSS-PST in their schools:

1. The system or approach to student support that MTSS-PST supplants will likely influence how administrators think about implementation. Implementers should identify how student support is understood and take this into account when planning implementation activities. MTSS-PST may require explicit teaching about the PST process.

2. The purpose of MTSS-PST implementation will also influence how implementation and the decisions that are made to implement it are

114

regarded. For this reason, it is important for district administration to

think about and clearly communicate the purpose of MTSS-PST

implementation. Clarity of purpose will make it possible to determine

whether the policy is solving the identified problem.

3. Early positive results can impact MTSS-PST implementation. This

may be a positive prospect in the implementation process.

4. Implementation may be less difficult, or more easily understood, from

a transactional perspective than a transformational one. Identifying

which type of change is desired may help implementers who want

MTSS-PST to be a transformative change in practice. Implementers

may need to plan for explicit conversations and trainings about the

transformative potential of the approach.

5. As one part of a larger MTSS framework, the PST implementation may

be impacted by the challenge of large-scale systemic change, even

when the change is desired. Implementation plans may benefit from

predictions and planning for how resource allocation, technical

assistance, and staffing patterns may need to change.

Implications for Policy

The implications of this study for policy are equally important as states,

regions, and localities look to the MTSS framework to improve student

outcomes. From a policy perspective, conceptualizing MTSS-PST as a transactional or transformational systems change is an essential element. This study illustrates that administrators who overwhelmingly— both at the district and building level— perceive MTSS-PST as a transactional systems change *do* see results that contribute to their sense of hopefulness and focus on implementing to the best of their ability.

Transactional change has value, especially if it results in improved outcomes for students. This study demonstrates that a concerted effort between the district and building administration, working from a mutual understanding that the system does need to change, can engage in what they perceive as a productive implementation process while also assessing what else is needed to meet their goals. While needs, like resources in staff and time, are certainly not new to education, these administrators also reported that MTSS-PST implementation may require organizational commitment to a lengthier planning stage, as well as being one part of smaller scale changes in systemic practices.

Connecting policy to shared values may also be an important factor. The desire to reduce special education referrals in favor of less restrictive interventions, and the development of a student support team that can flexibly address a number of systemic needs, makes implementation a flexible response to the diverse, or in MTSS parlance, tiered academic and social emotional needs

116

of students. If the ideal goal of MTSS policy is to transform schools—or to unbundle them so that they house a network of providers who offer a diverse set of learning supports— administrators at both the district and building level may need technical and educational assistance in understanding how to approach implementation from a transformational perspective.

Lastly, as the adaption of Honig's (2006) dimensions of contemporary education model illustrates, there could be a significant benefit from crafting MTSS policy that acknowledges the interaction between these dimensions of implementation by focusing on how and why a school implements MTSS.

Implications for Future Research

The findings in this study are important because, despite the popularity of MTSS and its PST process across the United States, there is little to no research examining its implementation at the school level. Honig (2006) explains that the value of understanding how the people, places, and policy of implementation interact resides in the collection of studies that reveal predictable implementation patterns. At a district level, these findings can be used as part of an implementation reflection process or a similar set of data could be collected at each of the district's schools to determine whether there are common implementation patterns and then how to address these patterns.

At a regional level, a similar study could be conducted at regional elementary schools engaged in MTSS-PST implementation to likewise surface implementation patterns, although such findings could shed light on more generalizable findings about the process of implementing MTSS-PST at the school building level. In both cases, these potential studies could inform how to best craft MTSS policy and the process of implementation, as well providing educational researchers with a richer understanding of how to best implement the MTSS framework. A natural next step to this study is to develop a research plan to understand the degree to which MTSS-PST implementation provides an effective process for supporting students in meeting grade level academic and behavioral expectations in the school in which this study was conducted.

It may be equally valuable to step outside this district and conduct a similar study at other elementary schools in New England to determine implementation patterns. Other potential next steps could include revisiting this school to understand how implementation will unfold over time and whether identified challenges will be resolved. It would also be interesting to enlarge the focus of the study to include interviews with a variety of stakeholders, including the problem-solving team, to develop a more holistic understanding of MTSS-PST implementation. Future study that unpacks the ways in which district office administration approach implementation would also be of benefit in aiding the

practitioner and the scholar in understanding how to bridge MTSS-PST

directives to the specific interactions of the policy and the people and places in

their districts.

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Appendix A
Interview 1: Questions

1. Please describe your understanding of school district MTSS-PST policy.

2. What does the MTSS-PST look like in your school? How does it work?

3. What do you understand the purpose and meaning of MTSS-PST policy to be? How would you define it in your own words?

4. To what degree is the MTSS-PST process you are implementing a new or different approach in the work you do to support students?

5. What is the process for implementing the MTSS-PST process in your school? How would you describe the implementation process?

6. What is it like to implement the MTSS-PST process? How would you describe it to colleagues in schools that have yet to implement MTSS?

7. How have you made decisions about the process of MTSS-PST implementation? What are some of the decisions you have had to make to implement the PST process?

8. To what degree is MTSS-PST implementation aligned with your school's other policies and initiatives? Please explain or give examples.

9. How does the MTSS-PST process align with your school's goals? To what degree have you had to make changes in your school to support MTSS-PST implementation?

10. How do you describe the implementation process to school staff and parents?

11. How is your implementation of MTSS-PST similar or different to other policies you implement in your school?

12. What have been some of the decisions you have had to make in implementing the MTSS-PST process? Why were these decisions made?

13. What challenges have you faced or are you facing as you implement MTSS-PST? Why are these challenges and how are you responding to them?

14. What kinds of support or resources have you identified as needing to implement the process in accordance with district policy? What do you need to successfully implement MTSS-PST?

15. If you had a magic wand, and could change anything about MTSS-PST implementation, what would you change? Why?

Interview 2: Questions

These questions are designed to help me better understand what I observed during the PST meeting.

1. When I observed, I noticed＿＿＿＿＿＿＿＿＿＿, can you clarify what this meant or why you think it happened?

2. When I observed, I did not understand why this happened: _____

_____. Can you clarify what this meant or why you think it

happened?

3. When I observed, there was a difference in what happened and what I had

thought would happen based on our first interview. For example: _____

_____. Can you clarify what this meant

or why you think it may have happened?

Appendix B
Observation Note-taking Organizer
MTSS-PST Observation Guide

Date of observation:
Roles (not names) of team members:

Structure: membership, agenda items, facilitation, roles, documentation

Description:

Data: identified problem, baseline, quantitative, observable

Description:

Interventions: research based, linked to an assessment, intervention supports

Description:

Planning: implementation, communication, follow up

Description:

Appendix C
The Multi-Tiered System of Supports

The following guidelines will assist in implementing the MTSS model for academics with fidelity and will enhance consistency across all schools in the district. Although instructional strategies and interventions may look different from Tier to Tier in schools, the key components of the problem-solving process need to be present and practiced in each building.

Tier I

At the beginning of the year, teachers are responsible for identifying instructional levels of all students. This determination should be an objective understanding from available data sources including SBAC results, district benchmark data, Fastbridge and other CBMs. Data should be collected from a variety of sources. At the elementary level, schools are expected to universally screen all students. With screening data, instructional decisions can lead to flexible instructional groups. At the secondary level, staff should utilize SBAC results, district benchmark data, quarterly and unit assessments to determine which students may be at-risk for failure or may be underachieving. Secondary schools may then decide to use a quick diagnostic instrument, or CBM to screen the students with concerns to determine their class schedule which may include a

double block in a specific content area. The above elementary and secondary examples would be considered standard protocols.

Another important aspect of Tier I is the curriculum. Each building establishes core curriculum in each content area that is aligned with state standards. Building Administrators are expected to support sound classroom management and instructional strategies through spot observations and instructional leadership. Administrators and teachers need to strive to meet the goal of improving student achievement.

After teachers screen and place students into instructional groups, teachers may have concerns about individual student progress. When a concern is identified, teachers have a responsibility to identify the specific areas of need and provide instructional strategies and interventions to enhance the student's opportunity for success whether the student is at-risk or underachieving. An expectation of teachers at this point is documenting the concern, the intervention, and the monitored progress. For example, if a 3rd grade teacher has administered an assessment at the beginning of the year and a student was identified as being Intensive on Oral Reading Fluency, the teacher may have several concerns. Initially, the teacher attempts to determine which component of reading is the root of the problem: phonemic awareness, phonics, fluency, comprehension, or vocabulary. If the problem is determined to be fluency, the teacher may

134

implement a strategy in which the student partners with another student every day for five minutes to practice reading passages as the other student times him/her. The student documents words read per minute on a graph, and the teacher and student conference at the end of every week. This is considered an intervention to increase fluency that the teacher could document. If the student continues to struggle, the teacher may do further assessment to determine whether the fluency problem is caused by poor word attack skills and then design another intervention. The teacher could also utilize the support of the grade-level team, the monthly data discussions, and other teachers who may have expertise in the problem area. Using a problem-solving process, the team defines the problem and may select another universal intervention or strategy for implementation. Although plans do not need to be formalized, documentation is necessary. Furthermore, teachers are expected to document communications with the student's parents to begin home/school collaboration.

Most importantly, progress needs to be monitored to determine if the intervention is successful. If the student makes insufficient progress, the teacher may refer the student to the PST by utilizing the school's documentation forms. An important aspect of referring a student to the PST is conducting a Gap Analysis. Initially, teachers may need support from the team to calculate the Gap Analysis; however, before proceeding with Tier II, a Gap Analysis is necessary.

- Teachers can begin classroom interventions with any student when concerns arise.

- Teachers are responsible for the implementation of interventions and progress monitoring at this level. Training may be necessary to support development of research-based instructional strategies and interventions.

- Teachers should also be supported by grade-level and school-based teams that discuss and analyze data as well as brainstorm interventions and strategies that are supported by research and best practice.

- Teachers and families should communicate about student progress and the interventions implemented in the classroom.

Tier II

As soon as a teacher completes the documentation for the Problem-Solving Team (PST), Tier II may begin, and parents continue as partners in developing an intervention plan that focuses on the identified need.

The problem-solving process at Tier II begins by collecting data that teachers document during Tier I.

Some students who are discussed by the PST will have participated in a standard protocol that was described in the prior Tier I section. When a student

does not respond adequately to the standard protocol, and the data supports the information, the PST may be consulted to plan in individualized intervention.

After the student's classroom teacher completes the documentation forms and provides the necessary information from Tier I to the designated PST facilitator, the designated PST facilitator evaluates the information and assigns a date and time for the PST to go through the problem-solving process to develop an intervention plan. The student's classroom teacher determines which specific academic or behavioral concern will be the focus of the PST. The student's classroom teacher will also analyze, to the extent possible, the factors contributing to the problem and will gather any other data that is necessary to ensure that the initial problem-solving meeting is efficient and productive. This may include observations of the student, more progress monitoring data, an interview with the student, etc. The student's classroom teacher should encourage parent involvement. It is the classroom teacher's responsibility to include the parent when gathering information and invite the parent to the initial problem-solving meeting. The importance of having the classroom teacher communicate with the parent is to signify that this continues to be a classroom plan and not a special education referral.

At the PST meeting, the facilitator guides the team, teacher and parents through the problem-solving process. The facilitator or the student's classroom teacher informs the team about the specific academic or behavioral concern and what factors are impacting the problem. This part of the meeting should take no longer than five minutes. Spending too much time on problem identification and analysis has the danger of limiting the dialogue around the data and intervention plan that will have the most impact on student achievement. At this point the team begins to brainstorm research-based interventions and strategies that are evidence to support the area of concern. The following factors must be considered in every MTSS plan: strategy or intervention, interventionist, progress monitoring tool, and monitor and follow-up meeting. When discussing a strategy or intervention, several essential points must be considered, including the learning environment, what intervention has already been implemented by the teacher, and the result of the intervention. In some instances, interventions may be continued, but the intensity, size of group or time may need to be adjusted. In other cases, a different intervention that is more focused on a specific skill area is necessary. Furthermore, the team must determine what resources are available to provide the intervention to the student.

Once the intervention is determined, progress monitoring must be discussed. At the Tier II level, more target and time efficient progress monitoring

138

tools need to be considered. Because progress monitoring needs to take place every other week at a minimum (every week for many cases), tools that are sensitive to minor changes are necessary. For Tier II, CBM are researched to be the most efficient and informative tools available to monitor progress. The tools should be selected based on the skill of concern. Furthermore, progress monitoring needs to be at the instructional level of the student. For example, a ninth grade student with a fluency concern, reading at the fifth grade level, needs to be progress monitored with fifth grade oral reading fluency probes. Another part of the progress monitoring plan is having an individual who is responsible for progress monitoring. The individual responsible for progress monitoring should determine a consistent plan (a specific day every week) for progress monitoring. The progress monitor is also responsible for documenting the student's growth by graphing, monitoring Gap Analysis, and identifying error patterns. The error patterns are vital in determining the instructional needs and developing intervention plans.

Finally, the team needs to determine the next meeting date based on the predicted time for intervention success. However, during the time between the initial and follow-up meeting, the student's classroom teacher is responsible for communicating with the necessary individuals, such as the interventionist, to determine effectiveness of the intervention. At no time should the intervention

stop without a replacement intervention. If the student demonstrates insufficient progress, the student's classroom teacher may collaborate with the interventionist to make modifications to the intervention. Also, a follow-up meeting may need to take place sooner to select a different intervention. It is the responsibility of the classroom teacher to communicate any concerns with the intervention plan with the interventionist between the initial and follow-up meetings.

If the student's progress is sufficient, the student may return to Tier I level with universal supports. If the target level of interventions is not sufficient, the problem-solving team may elect to move to Tier III.

- Teachers complete documentation for the PST.
- Consultation with student's classroom teacher(s) helps define and analyze the concern.
- The PST meets to develop an intervention plan.
- PST meetings are efficient and focused on the specific, measurable outcome.
- Interventionists implement the intervention.
- Progress monitoring happens more frequently to determine whether the intervention is working.
- Consultation continues after the PST meeting between the student's classroom teacher and interventionist.

140

- Teachers and families communicate about student progress and the interventions implemented in the classroom.

Tier III

If a student moves to Tier III, the problem-solving process looks identical to Tier II, although the intervention and progress monitoring increase in frequency and/or intensity. It should be noted that the consultation that encompasses the entire problem-solving process is most important. The student's classroom teacher and interventionist should be communicating on a weekly basis, parents should be engaged and informed throughout the process, and progress monitoring should be the guiding force in making intensity-level changes. A Gap Analysis should be the ultimate determining factor in deciding whether sufficient progress is being made. Also, during Tier III diagnostic assessments may become more important. For example, if determining whether there is a processing concern in reading, the Comprehensive Test of Phonological Processing may be administered to determine if the concern is in the area of memory, fluency, etc. Diagnostic information from observations may also be necessary.

When teams are discussing prescriptive interventions at Tier III, they need to consider a reasonable target for the student within a specified period

of time to implement the intense services. If the student is successful with the intervention and demonstrates sufficient progress, the team may consider whether the student is able to move to Tier I or Tier II. If the student does not make sufficient progress and the needs are documented to be ongoing Tier III level supports, the student may need to be considered for a referral for a special education evaluation. At this point, an evaluation and planning team would be organized to address the development of an individual evaluation plan.

- This is the most intensive phase of the MTSS Model.
- As with Tier II, it is imperative that we can prove, through data-based decisions, whether the interventions were implemented with fidelity.

Tier IV

If the student is eligible for special education, then the student would be placed in Tier IV. Appropriate services and supports will be identified through an Individualized Educational Plan determined by members of the student's team and parents.

Appendix D
Inductive Codes

1. PST Roles

2. Goal of PST

3. PST Team

4. PST Data

5. PST Decision-Making

6. PST Structure

7. PST and Special Education

8. PST Change in Practice

9. PST Forms

10. PST Resources

11. PST Agenda

12. PST/MTSS System

13. PST and Staff- Teachers and Administrators

14. Implementation Plan

15. Implementation Guidelines

16. Implementation Resources

17. Implementation Challenges

18. Implementation Direction

19. Implementation Theory vs. Practice

20. Implementation Goals

21. District Role in Implementation

22. Implementation Needs

1. District office implementation supervisors define the terms of the PST implementation

2. PST is a vehicle for reducing special education referrals for evaluation

3. PST is an improved EST/157 planning team

4. PST is the vehicle for sorting students into Tiers 1-3

5. PST is a gateway for the special education referral process

6. PST provides support for Tier 1 classroom interventions

7. There are a lot of unknowns for implementation of the PST process and MTSS in general

8. Resources are not adequate

9. PST directs implementation but does not provide adequate supports for implementation

10. PST and MTSS is so much better than what we were doing, and we are making progress

11. The PST process is facilitated and implemented by one administrator
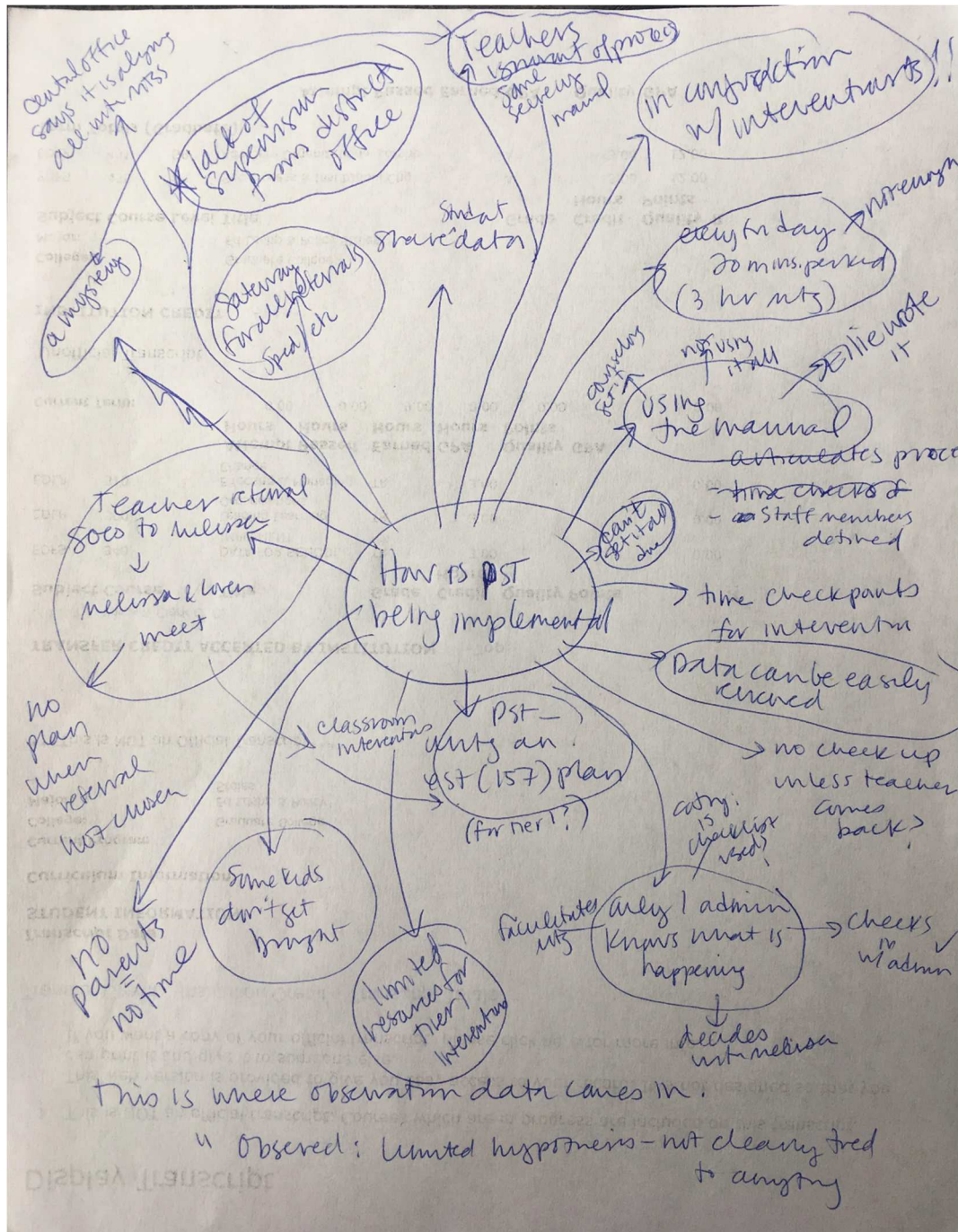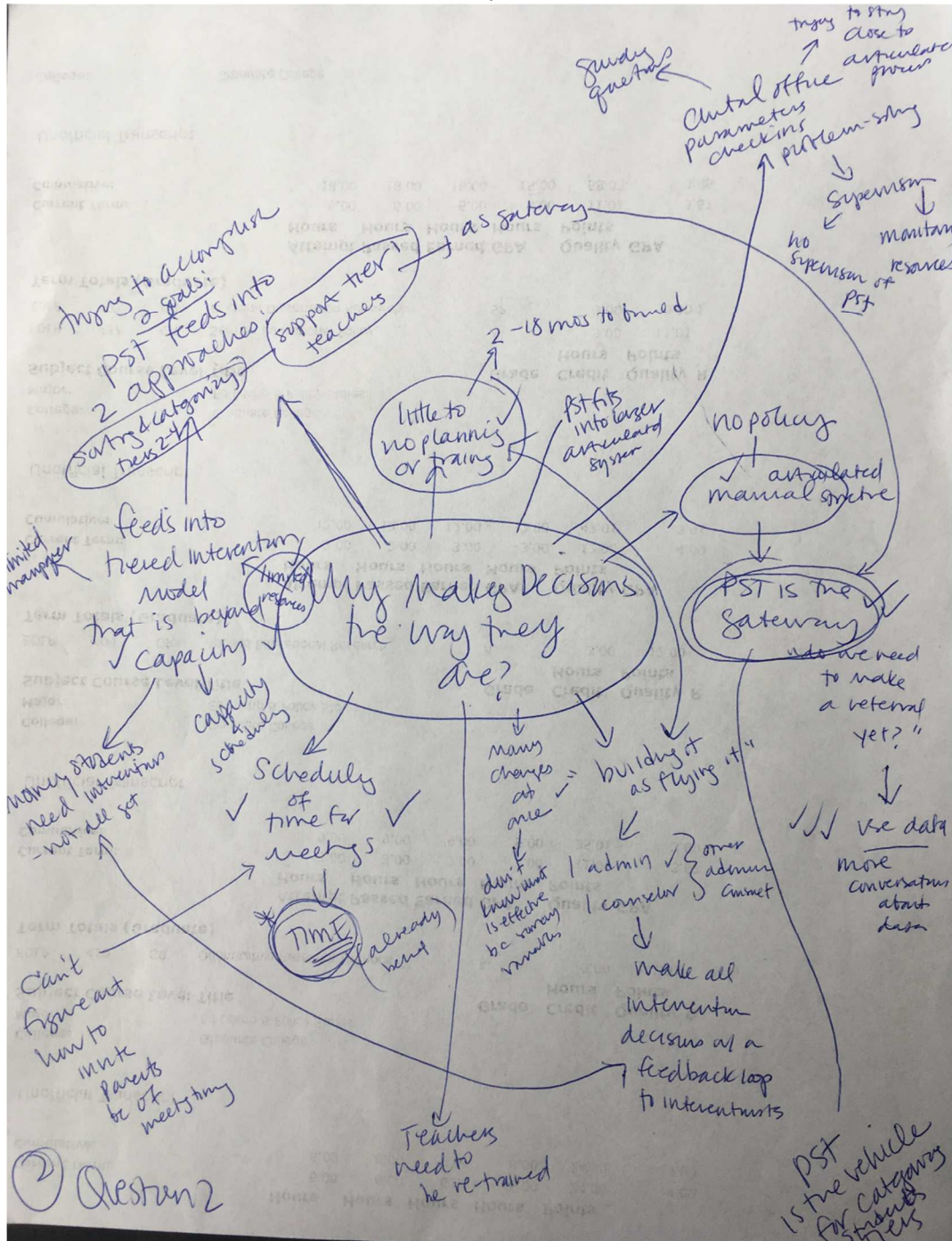
Appendix G
Themes from Cognitive Map

1. A district office directive

2. PST is part of systemic change for Special Education

3. PST is an improved, data-focused EST

4. PST is essential to providing a tiered model of supports

5. PST is designed to meet three distinct supports within the MTSS
   framework

6. Implementation: multiple changes simultaneously

7. Central Office Implementation

8. Hope and Relief

Appendix H
Thematic Outline

1. **How are building-based administrators conceptualizing the process of MTSS-PST implementation?**

   A. **Part of a District directive to enact systemic change to reduce Special Education.**

      a. PST is a vehicle for reducing referrals for evaluation.

         i. District office supervisors see implementation as directive and collaborative

         ii. District office supervisors report the same

   B. **PST is an improved, data-focused EST.**

      a. The PST is an improved EST/157 planning team.

         i. District office supervisors report the same

   C. **PST is a vehicle for sorting students into a much-needed tiered model of supports**

         i. District office supervisors report the same

2. **Why are Implementers making decisions they are making?**

   A. **PST meets three other implementation needs within the MTSS framework:**

      a. Sorting students into Tiers 2-3

      b. As a gateway for the Special Education referral process

149

  c. As a support for Tier 1 classroom interventions

    i. District office supervisors report the same.

B. **Experiencing an "Implementation burden" from multiple simultaneous systemic changes**

  a. There are a lot of unknowns for PST process and MTSS.

  b. Resources/capacity are not adequate.

    i. District office supervisors somewhat report the same.

C. **Central Office Supervision/Support Deficit**

  a. Directs implementation and does not provide adequate support for implementation

    i. District office supervisors do and do not report the same

D. **Hope and Relief from Previous Policy**

  a. PST and MTSS is so much better than what we were doing, and we are making progress.

    i. District office supervisors report the same.

3. **What are building based administrators doing with PST implementation?** (What is happening?)

A. The PST process is facilitated and implemented by one administrator (black box).

B. PST is the vehicle for a new approach to student sorting.

C. It is a SPED Gateway.

D. It is a data focused EST process.

Appendix I
Interactive Policy Dimensions

How and why do interactions amongst policy design dimensions shape MTSS-PST Implementation?

People— participants and their starting beliefs, knowledge, and orientation towards demands

Policy—demands specific policies place on implementers

Place—context that helps shape want people can and will do

Policy: MTSS-PST

(The Problem: Special Education costs too high and outcomes too low)

Change Goals-—Reduce special education costs and raise student outcomes

Target—Special and General Education System

Tools—MTSS of which PST is a central component

People: Elementary School Building Administrators and District Office Supervisors

Place: Elementary School

Interaction 1

A. Technical definition is understood by all in same way.

B. Purpose is uniformly agreed to, liked, and understood by all in the same way.

C. Fits with cognitive schema for data/accountability.

D. Fits into cognitive schema for support team meeting.

E. Part of changes that created quick results in the first year

F. Rushed directive to implement with little understanding

G. One part of a much larger policy implementation

Interaction 2

A. Lack of resources/capacity

B. An easy piece within a lot of quick change for one place

C. Can be done by only one admin

D. Fits with idea of school sorting

E. Fits in with paperwork/meeting systems

Interaction 3

A. Change was needed; proof in first year

B. Scheduling/staffing difficult to change

C. Student needs are big

D. History of POOR implementation—co-teaching

153

E. History of over-identification for sped

F. A lot of restrictions on admin change agency

G. Fits with what is already known