

# **Commission on Special Education Funding**

**Plano RDSPD: Invited Testimony  
June 27, 2022**

Debbie Martin  
Plano RDSPD Coordinator



## Table of Contents

<b>Introduction.....</b>	<b>3</b>
TEA Provisions for Regional Day School Programs for the Deaf	
<b>Overview of Plano RDSPD.....</b>	<b>4</b>
<b>Description of Plano RDSPD Services.....</b>	<b>4</b>
<b>Plano RDSPD Funding.....</b>	<b>6</b>
Plano RDSPD Duties as the Fiscal Agent	
Plano ISD Obligations to RDSPD	
Student Categories for Accounting and Funding	
Federal and State Grants for RDSPD Funding	
PEIMS Reporting	
Plano RDSPD Funding Over Time	
Member District Local Contributions	
Exhibit A – Formulas to Compute Billing	
2021 – 2022 Percentage of Contributions to the RDSPD Budget	
2021 – 2022 Percentage of Shortfall Paid by Each Member District	
<b>Recommendations.....</b>	<b>15</b>
<b>References.....</b>	<b>17</b>

## **Introduction**

### **TEA Provisions for Regional Day School Programs for the Deaf**

Regional Day School Programs for the Deaf (RDSPD) were established to provide programming for students who are deaf or hard of hearing in the state of Texas. The provisions are outlined in TEA's (2020) RDSPD and Shared Services Arrangements (SSA) Procedures document:

“Texas Education Code (TEC) Chapter 30, Subchapter D requires the Texas Education Agency (TEA) to have a process of providing, on a statewide basis, a suitable education for students who are deaf or hard of hearing. Part of this process involves the establishment of regional day school programs for the deaf (RDSPDs) in each of the state’s regions. Under 19 Texas Administrative Code (TAC) §89.1080, all local educational agencies (LEAs) shall have access to RDSPDs. LEAs include independent school districts and charter schools. Any student who has a hearing impairment that severely impairs processing linguistic information through hearing, even with recommended amplification, and which adversely affects educational performance shall be eligible for consideration for the RDSPD, subject to the recommendations of the student’s admission, review, and dismissal (ARD) committee. 19 TAC §89.1080.

“As part of the comprehensive statewide plan for educational services for students who are deaf or hard of hearing, including the legislative mandate of TEC §30.083 regarding the provision of appropriate education in regional day school programs for the deaf, TEA authorizes and encourages LEAs or education service centers (ESCs) to enter into contractual arrangements with other LEAs to effectively and efficiently jointly operate RDSPDs so that the intent of TEC Chapter 30, Subchapter D is met.”

Texas has 53 RDSPDs to serve the needs of deaf and hard of hearing students in the state. Fifty of the RDSPS have an LEA as the fiscal agent.

## **Overview of Plano RDSPD**

As Collin County was beginning to experience growth in the 1980's, it was determined that an additional RDSPD was needed to support the needs of students who are deaf or hard of hearing that lived in Collin County. Plano RDSPD was started in the 1988 - 1989 school year with three teachers to meet the needs of preschool students and itinerant students who received DHH services on their home campuses. Older Collin County students were allowed to continue their services in the Richardson RDSPD. Parent Infant services for birth to three-year-old students and their families were added in the 1989-1990 school year. Each year, the program added a grade level for students served in Plano RDSPD centralized classrooms. Over the next twelve years, the program added RDSPD centralized services for all grade levels.

The original Shared Service Arrangement (SSA) for Plano RDSPD began by serving the needs of students who are deaf or hard of hearing or deaf blind and residing in a Collin County school district which include Allen ISD, Blue Ridge ISD, Celina ISD, Community ISD, Farmersville ISD, Frisco ISD, Lovejoy ISD, McKinney ISD, Plano ISD, Princeton ISD, Prosper ISD, and Wylie ISD. Later Richardson ISD and Coppell ISD became SSA members. Carrollton-Farmers Branch ISD was a member district for a few school years. The RDSPD also serves students attending charter schools located in Collin County under a contract for services with each individual charter school. At present, Plano RDSPD serves 14 member districts and typically one to three charter schools.

Plano is one of six RDSPDs that serve students in the Region 10 service area. Plano RDSPD is the second largest RDSPD in the Region 10 area. The program directly serves over 300 students from birth to 22 years old. Consultation services are provided for over 150 students who are deaf or hard of hearing and do not need weekly direct services from a teacher of the deaf.

## **Description of Plano RDSPD Services**

- Parent/Infant (birth - three) services are provided through a memorandum of understanding between Plano RDSPD and the Early Childhood Intervention Program (ECI) that serves the location of the family's residence.
- Services are available for early childhood through high school (ages 3-22) in centralized classrooms on a regular education campus for intensive instruction from a teacher of the deaf. Students may spend some portion of their day within

the general education setting based upon each student's individual needs.

Centralized campuses include Pearson Early Childhood School, Davis Elementary School, Haggard Middle School, Vines High School, and Plano Senior High School.

- Families and their students have the choice of communication modes for instruction. The program currently offers auditory/oral (listening and spoken language) and total communication (simultaneous communication of voice and English based sign systems). Beginning with the 2022 school year, a Bilingual-Bicultural classroom is starting at the elementary campus to meet the needs of students using ASL. All classes are taught by certified, highly qualified teachers of the deaf.
- Itinerant teachers of the deaf provide direct instruction and support to students who are deaf, hard of hearing, or deaf blind who are enrolled in general education or basic special education programs on their home school campus.
- Consult services can be provided by itinerant teachers of the deaf to students on their home campus who due to their deafness need accommodations and training for their educational teams.
- Intensive speech and language evaluations, direct intervention, and consultation are provided to qualifying students by certified speech language pathologists and certified teachers of the deaf.
- Sign language interpreting/transliterating is provided for students who need sign language for communication access in the general education setting and for before and after school educational activities.
- CART (Communication Access Realtime Translation) is provided for students who read at least on a 5th grade level and need speech to text transcription to access instruction in the general education setting and before and after school as specified in the IEP.
- Deaf Blind Interveners are provided for deaf blind students to help them gain access to their environment and communication if recommended through evaluation and the ARD process.
- Other additional support and services such as counselors, physical therapists, occupational therapists, and nurses are available to students if recommended through evaluation and the ARD process.
- Information and guidance are provided as needed for families of children who are Deaf or Hard of Hearing through home visits, parent groups, community classes, publications, and organizations.
- Sign language training is offered to family members and the community.

## **Plano RDSPD Funding**

### **Duties as the Fiscal Agent**

As outlined in the Texas Education Agency Department of Special Education Programs Regional Day School Programs for the Deaf Procedures, “The RDSPD SSA must designate a fiscal agent that will be responsible for conducting specified administrative duties for the RDSPD. The fiscal agent may be a member LEA or an ESC.”

Per the Plano RDSPD Shared Service Agreement (SSA) as the fiscal agent, “Plano ISD is responsible for applying for, receiving, collecting, expending, and distributing all funds, regardless of source, in accordance with the budget reviewed by PRDSPD Advisory Board and adopted by the Plano ISD Board. The Fiscal Agent shall provide accounting services, reports, PRDSPD records, suitable facilities for special education administrative and support staff, and shall perform any other responsibilities required by Plano ISD policies.

“The Fiscal Agent will account for the salaries and expenses of PRDSPD personnel; PRDSPD operating expenses; IDEA, Part B funds; Elementary and Secondary Education Act and other funding received for the purpose of furthering the program.

“The Fiscal Agent will maintain personnel records and payroll systems for all PRDSPD staff.

“The Fiscal Agent will prepare and submit, on behalf of PRDSPD, any reports or applications required by federal or state law or Plano ISD policy, including but not limited to PEIMS student data reports and other reports required by the Texas Education Agency (“TEA”).

“The Fiscal Agent is solely responsible for reporting PEIMS data for all students that attend the centralized PRDSPD on a full-time basis, even if the students are transfer students from another Member District.

“The Fiscal Agent will receive applicable average daily attendance(ADA) associated with PEIMS reporting. Member Districts will be responsible for reporting PEIMS data for all students who participated in PRDSPD but do not attend the centralized PRDSPD on a full time basis, and still attend school in the Member District in which they reside.

“The Fiscal Agent may negotiate contracts with outside service providers for special

education and related services for students with disabilities in accordance with state and federal law and Plano ISD policies. The Fiscal Agent shall require each outside service provider to comply with state and federal law.

“The Fiscal Agent shall maintain records for purposes of compliance with the Texas Public Information Act, and applicable retention schedules.”

### **Plano ISD Obligations to RDSPD**

As the fiscal agent, Plano ISD takes on the responsibility and financial costs to provide services and resources to the RDSPD students enrolled in Plano ISD. Those resources include campus administrators, general education teachers, grade level curriculum, general education and special education training, classroom and office space, HR and employee services costs, payroll services, financial and administrative help and guidance, PEIMS reporting services, instructional technology, and hearing technology.

Plano ISD does receive applicable average-daily-attendance (ADA) associated with PEIMS reporting. For the 2021 – 2022 school year, Plano ISD received ADA for 89 RDSPD students who reside in other member districts. These ADA funds help offset Plano ISD costs as the fiscal agent.

### **Student Categories for Accounting and Funding**

Plano RDSPD students are categorized into four different categories based on services received for tracking, funding, and billing purposes. Those categories include:

- Home Based – These are the services provided in the homes to families and their children from birth to three by a teacher of the deaf in conjunction with ECI.
- Center Based - These students need intensive daily services from a teacher of the deaf to access curriculum and make progress. These students may also require sign language interpreter services or CART to access the instruction.
- Itinerant – The students need minimal instruction from a teacher of the deaf and can receive the majority of their instruction on their home school campus.
- Consult – These students are successful in their home school general education classroom or district special education classroom. Their need is for a teacher of the deaf to train the educational team about their needs and accommodations related to their deafness. Consult students do not generate any state or federal grant funding.

## **Federal and State Grants for RDSPD Funding**

Funding for RDSPDs are outlined in Texas Education Code §30.087,

“(a) The cost of educating students who are deaf or hard of hearing shall be borne by the state and paid from the foundation school fund, but independent school districts and institutions of higher education in the state may and are encouraged to make available property or services in cooperation with the regional day school programs for the deaf for any activities related to the education of students who are deaf or hard of hearing, including research, personnel training, and staff development.

(b) From the amount appropriated for regional day school programs, the commissioner shall allocate funds to each program based on the number of weighted full-time equivalent students served. The commissioner may consider local resources available in allocating funds under this subsection.

(c) A school district may receive an allotment for transportation of students participating in a regional day school program, determined in the same manner as an allotment for the transportation of other special education students.”

The following federal and state grants support the Plano RDSP budget:

- State Deaf - 435
- IDEA-C Early Childhood Intervention - 340
- IDEA-B Discretionary Deaf - 315

Dr. McCormack addressed the funding sources in her testimony. These three funding sources work the same for LEA run RDSPDs.

## **PEIMS Reporting**

RDSPD grants are calculated based on the PEIMS data reported on students served on the October snap shot date who are directly served by an RDSPD teacher of the deaf at least 45 minutes weekly. As per the Plano RDSPD SSA, “The Fiscal Agent is solely responsible for reporting PEIMS data for all students that attend the centralized PRDSPD on a full-time basis, even if the students are transfer students from another Member District. Member Districts will be responsible for reporting PEIMS data for all students who participated in PRDSPD but do not attend the centralized PRDSPD on a full time basis, and still attend school in the Member District in which they reside.”

The Plano RDSPD works with our Member Districts to ensure that all eligible students are reported correctly in PEIMS as participates in RDSPD. Through the PEIMS reporting students are linked to Plano RDSPD through the 10011 record. The 41163 record provides the additional documentation of special education eligibility, instructional setting, and related services.



**Plano RDSPD Grant Funding Overtime**

<b>School Year</b>	<b>Total Grant Funding</b>	<b>Shortfall Billed to Districts</b>	<b>Number of Direct Students Billed to Districts  (receive grant funding)</b>	<b>Number of Consult Students Billed to Districts  (no grant funding)</b>
2021 - 2022	\$2,038,616.00	(\$2,520,137.00)	292	163
2020 - 2021	\$2,360,934.80	(\$2,407,961.20)	293	172
2019 - 2020	\$2,190,211.86	(\$2,876,314.14)	311	184
2018 - 2019	\$2,476,659.13	(\$2,254,165.87)	322	196
2017 - 2018	\$2,703,330.44	(\$2,152,012.56)	321	186
2016 - 2017	\$2,727,473.00	(\$1,865,152.00)	335	169
2015 - 2016	\$2,724,067.00	(\$1,611,079.00)	316	176
2014 - 2015	\$2,549,893.00	(\$1,648,624.00)	311	143
2013 - 2014	\$2,508,357.00	(\$1,679,309.00)	311	137
2012 - 2013	\$2,875,726.00	(\$1,250,952.00)	311	137

Over the past ten years, grant funding has decreased and the shortfall which is billed to districts as tuition has increased. The increase in costs to member districts are due to insufficient grant funding, salary increases, and stipends to attract and retain staff. For the past six years, other expenses funded by the RDSPD budget have not been increased. The other expenses include staff mileage, materials, supplies, professional learning, assessment materials, DHH curriculums, contracted services, and travel.

Since the 2019 – 2020 school year, the shortfall has comprised more than 50% of the total operating budget for the Plano RDSPD. The amount of tuition charged to individual districts each year continues to increase. As small districts are growing, their tuition bills can greatly increase from year to year.

## Member District Local Contributions

Texas Education Code §30.085 states that “local resources shall be used to the fullest practicable extent in the establishment and operation of the regional day school programs for the deaf.” Each RDSPD determines through their SSA the method for calculating member contributions to fund the RDSPD. Plano RDSPD member contributions are calculated based on a weighted formula. Plano is the only RDSPD that bills member districts using a weighted formula based on staff time per student.

Plano RDSPD develops an operating budget based on costs and services to run the RDSPD. Any cost over and above the amount of state and federal grants, excluding excess individual student costs are divided among the member districts using a weighted formula. Excessive individual student costs agreed upon in an ARD meeting are billed to the student’s member district. These individual student costs can include direct nursing services and deaf blind interveners. In addition to the weighted formula member districts are also charged for services provided by the Plano ISD Special Education Department for services such as occupational therapy, physical therapy, vision, adaptive PE, orientation and mobility, three year re-evaluations, partial re-evaluations, and counselors.

The weighted formulas for billing are outlined in Exhibit A of the Plano RDSPD SSA.

### EXHIBIT A

#### Formulas to Compute Billing

DMS = Direct Minutes per Student
IMS = Indirect Minutes per Student
TMS = Travel Minutes per Student
ISTM = Individual Student Total Minutes per Week
GTMM = Grand Total Teacher Minutes
TNSC = Total Number of Students per Campus
TNDTC = Total Number of Deaf Ed Teachers per Campus
TNPC = Total Number of Paras per Campus
TNSCAC = Total Number of Students with Communication Access per Campus
TNCPPC = Total Number of Communication Access Provider per Campus
PTT = Percent of Teacher Time
PPT = Percent of Para Time
PCAT = Percent of Communication Access Time
GTD = Grand Total for all Districts

**Itinerant Students and Parent/Infant Students:**

1. Compute Individual Student Teacher Time per Week

$DMS + IMS + TMS = \text{Total Teacher Minutes per Student}$

2. Add All Teacher Minutes per Students Together =

Grand Total Teacher Minutes

3. ISTM

$GTTM = \text{Percent of Time Charged per Student}$

**Centralized Students:**

TNSC

$TNDTC = \text{Percent of Teacher Time per Student}$

TNSC

$TNPC = \text{Percent of Para Time per Student}$

TNSCAC

$TNCPPC = \text{Percent of Communication Provider Time}$

Add Percentages Together for Percent of Time Charged per Student

$PTT + PPT + PCAT = \text{Percent of Staff Time per Student}$

**District Billing:**

1. By District: Add All Students' Percentages together to get a

Total Percent by District.

2. Add Together All the Total Percent by District to get the Grand Total

for all Districts.

3. GTD

Funding Needs = Billing Factor to be Charged to the

Districts using Total Percent by District.

4. Total District Percent X Billing Factor = Charge to the

District

5. Add Costs for PISD Special Ed Services Provided to Member District

Students.

6. Add One-on-One Provider Charges (excessive individual student costs) to Districts of

Student with Services.

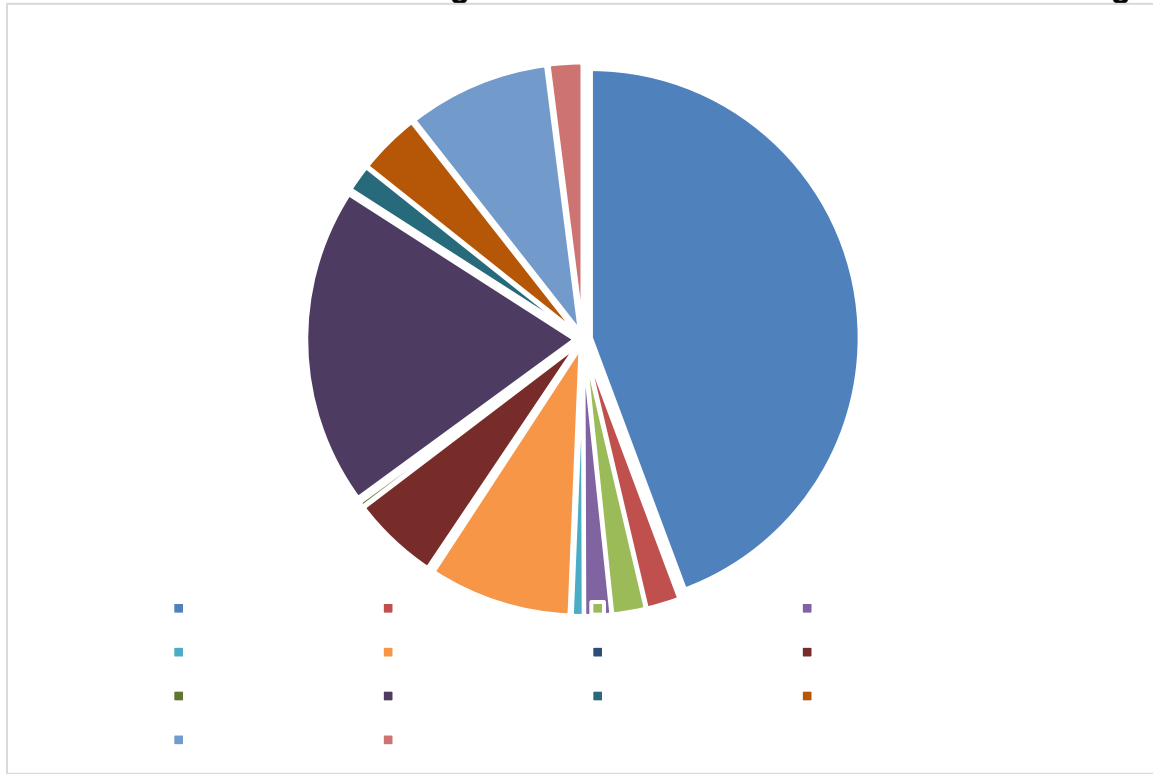
Consult Students are calculated by the same equation as the one used for itinerant services with a reduction in the amount of weekly time since consultation happens approximately five times per school year. Since consult students are not served directly, the RDSPD does not receive grant funding for them. The districts pay a small tuition fee based on the weighted formula for the consultative service.

The weighted formula was adopted by the SSA Board when the RDSPD began charging tuition to member districts. The weighted formula allows the member districts to pay for the services their students' needed. In 2019, the weighted formula was modified to make it easier to figure the billing. Member districts have been unwilling to move to a per student fee.

To bill for the shortfall, data is collected based on staff to student time during the first week of December. The budget is then scrubbed to reduce any spending possible. Then the weighted formulas are used to determine the charge for each student who was enrolled between the October snapshot date and December 1. Districts get their tuition bills in March or April.

During the 2021 – 2022 school year grant funding only paid 44% of the total operating budget of the Plano RDSPD. The chart shows the percentage of the total RDSPD budget paid by grant money and each member district.

**2021 – 2022 RDSPD Percentage of Contribution to the Plano RDSPD Budget**



Excludes PISD SPED Direct Services

Using the weighted formula to determine charges to each district, the costs are passed on based on the weighted student time for each member district. The number of students is not necessarily a determining factor in a districts total bill as illustrated in the chart.

**2021 – 2022 Percentage of Shortfall Paid by Each Member District**

District	Student Count	Weighted Student Time	% of Shortfall Paid by District
Allen ISD	41	1.987	3.18%
Anna ISD	21	1.993	3.19%
Community ISD	8	1.824	2.92%
Farmersville ISD	7	.743	1.19%
Frisco ISD	92	9.587	15.35%
Lovejoy ISD	4	.173	0.28%
McKinney ISD	51	5.888	9.43%
Melissa ISD	10	.374	0.60%
Plano ISD	123	20.928	33.51%
Princeton ISD	11	1.856	2.97%
Prosper ISD	28	4.127	6.61%
Richardson	31	9.636	15.43%
Wylie ISD	28	3.331	5.33%

Excludes costs for Plano ISD SPED Services and Individual Student Costs

Typically, students who attend the centralized programming are more expensive than the students served in the home or itinerantly on their home school campus. The reason for the higher cost is the amount of direct services required and the additional needs by some students for services to provide communication access.

## **RECOMMENDATIONS**

### **Consider reviewing special education funding models to determine if there is a more cost effective model for funding services for RDSPD services.**

The current RDSPD funding model is a census-based funding model. The model does not take into consideration the level and type of service required by individual students to make progress in the general education curriculum and to meet their needs for communication access. Some students served in the RDSPD require a high level of service provided by certified teachers of the deaf, certified interpreters, CART providers, deaf blind interveners, and/or paraprofessionals. Other students may be successful on their home school campus with only weekly services from an itinerant teacher of the deaf. The current model does not take into account the service needs of students.

### **Consider an increase in the state budget's funding for RDSPD programming.**

State and federal grant funding for RDSPDs has remained consistent for over the last ten years. During this same time period, the staff costs for providing services has increased. The increased costs for providing services through the RDSPD have increased RDSPD shortfalls and thus increased the tuition billed to member districts. The Texas legislature created RDSPDs to help LEAs provide services and supports to their students who are deaf or hard of hearing. As the costs continue to rise, LEAs are questioning their costs to the RDSPD. For smaller districts with high growth rates, the RDSPD tuition bill can cause financial hardship for those districts.

### **Consider a review of all RDSPD SSA local contribution formulas and possibly develop a standard set of rules and a formula for calculating member LEAs' local contributions to make RDSPD billing standard across the state.**

To provide more equity for all member LEAs statewide, it may be beneficial for the state legislature to develop one standard formula for the calculation of member contributions. There is a wide variety of calculations employed by various RDSPDs to figure the amounts of member contributions. Some fiscal agents pay tuition to support their students served in the RDSPD and others do not pay any tuition because of the services they provide as the fiscal agent. Since Plano RDSPD began charging tuition, Plano ISD has paid their share of the tuition based on the service Plano ISD students received. Plano ISD has the largest tuition bill each year.

### **Consider an increase of funding in the state budget for early childhood intervention services for students who are deaf, hard of hearing, and deafblind.**

Early services for students who are deaf, hard of hearing, or deaf blind are essential for language acquisition. RDSPDs provide services in conjunction with Early Childhood

Intervention to provide services to the child and the family in the home. It is through these important early services, that parents learn the skills to help their children develop language, communication, sign language, speech, listening skills, and more. The funding to provide these services is inadequate.

**Consider the creation of a similar grant for LEA run RDSPDs as the grants that support ESC as the fiscal agent.**

Plano RDSPD is directly responsible for providing financial, instructional, and professional leadership for the Plano RDSPD. The ADA money generated for the Plano ISD students enrolled in Plano ISD does not go to the RDSPD. Plano ISD used the ADA funding to offset the district assumed costs of the RDSPD students.

To effectively run the Plano RDSPD requires the employment of a program coordinator, team leaders, and a secretary. These staff members, contracted services, instructional supplies, assistive technologies for students, and professional learning for are funded by our three state and federal grants based on student numbers and LEA contributions.



## References

Texas Education Agency. (2020). *Regional day school programs for the deaf (RDSPDs) and shared service arrangement (SSA) procedures.*

<https://tea.texas.gov/media/document/278086>

Texas Education Code §30.081-30.087

Plano RDSPD Shared Service Arrangement -

<https://drive.google.com/file/d/1jF9y62GTFsxEzIreknOyRfaGqdZKvGEi/view?usp=sharing>