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Testimony Before the District of Columbia Council
Committee of the Whole and Committee on Education
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Public Hearing:
"Improving School Attendance: Truancy, Chronic Absenteeism, and the
Implementation of Reform Initiatives"

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Introduction

Good afternoon Chairman Mendelson, Chairman Grosso and members of the Committees. My name is Judith Sandalow. I am the Executive Director of Children's Law Center¹ and a resident of the District. I am submitting this testimony on behalf of Children's Law Center, which fights so every DC child can grow up with a loving family, good health and a quality education. With 100 staff and hundreds of pro bono lawyers, Children's Law Center reaches 1 out of every 9 children in DC's poorest neighborhoods – more than 5,000 children and families each year. The majority of children we assist attend a DC school.

I want to thank you both, Chairman Mendelson and Chairman Grosso, for continuing to focus on truancy prevention and for holding this joint public roundtable on such a critical issue. We have seen important progress in truancy prevention and intervention over these past few years. A few notable examples:

- DC Public Schools (DCPS) is holding more Student Support Team (SST) meetings than ever, with SST meetings being held regarding 75 percent of eligible students in school year 2016-2017.²
- DCPS Pathways Coordinators are in all the comprehensive and alternative high schools with the purpose of building a positive relationship to connect struggling students to the school.³

- We have had positive experience with the creativity of several Public Charter Schools (PCS), which I will discuss later in this testimony.

Despite progress, the District still has more to do to further improve outcomes for our youth and families. My testimony today will focus on our observations about the impact of the School Attendance Clarification Act, updated data regarding our mandatory referral systems, and truancy intervention practices.

Undocumented Suspensions

Let me start my testimony addressing a very pressing issue that some of my colleagues from the Ever Student Every Day Coalition will discuss in more detail during their testimony – the pervasive use of undocumented suspensions and fraudulent attendance record-keeping practices at many of our schools.⁴

Undocumented suspensions are not simply a discipline issue – they are also very much an attendance issue. Attending school every day is critical to student success.

However, many students are being sent home by their school and schools are documenting this absence as unexcused rather than as the suspension that it is.

Students get the message that they are not welcome or wanted from the adults who should be encouraging and expecting them to attend school. Schools are also putting students and their parents at risk of being charged with truancy and educational neglect, allegations with significant legal consequences.

Undocumented suspensions can have a dramatic impact on the students. For example, a former Children's Law Center client, Maya,⁵ was a middle school student who was involuntarily sent home by her school in the middle of the day and told not to come back without her parent. Her mother wasn't able to take time off from work without losing her job, and she sent Maya to school the next day. When Maya tried to go back to school and attend her classes, her school's security guard said she wasn't allowed in the building and sent her away. All of the days she missed were counted as unexcused absences, which ended up turning into a truancy problem. And because this wasn't documented as a suspension, the school didn't hold the required meetings where a real conversation about the root cause of her behaviors could have taken place. For Maya and her mom, this meant both excessive and unnecessary lost class time and the threat of legal consequences for truancy. Our goal should be to keep our youth in class and learning, not exclude them and make them feel unwelcome.

While these practices have only been formally documented in several DCPS high schools,⁶ we know from our clients' experiences that students in elementary and middle schools are subjected to undocumented suspensions, as well. Until these practices stop, we urge the Council to ensure no more students and parents are subjected to prosecution. Simply put, the Council should place a moratorium on all truancy court referrals.

Being Tardy, Rather than Absent, is Still Leading to CFSA and Court Referrals

Last year, this Council passed into law the “School Attendance Clarification Amendment Act of 2015,”⁷ which aimed, in part, to eliminate unnecessary referrals to the Child and Family Services Agency (CFSA), the Court Social Services Division (CSSD) of the Superior Court of the District of Columbia, and the Office of the Attorney General Juvenile Section (OAG). These unnecessary referrals were due to a regulation that defines missing more than 20% of a school day as an absence, commonly called the “80/20 rule.” That rule led to students receiving truancy referrals for chronic tardiness.

To solve this problem, the Council amended the requirement that schools refer to CFSA or the court after 10 or 15 unexcused “full school day” absences, respectively.⁸ The Office of the State Superintendent of Education (OSSE) updated its Truancy Guide for Parents and its messaging to LEAs after the change. However, the regulations by OSSE remain unchanged, defining an absence as 20% or more of a school day.⁹ We also reviewed LEA student handbooks and found that many public charter schools have not changed their attendance policies since the new law went into effect. These LEAs have written policies that state they will refer a student after missing 20% or more of the requisite number of school days.¹⁰

The problem is not simply on paper. Our experience is that many DCPS and public charter school students are being referred to CFSA or the court after being tardy several times. Whether schools are not aware of the changes or because the required

dual recordkeeping is confusing or burdensome, what is clear is that we have not completely solved the issues of the 80/20 rule.

Referrals Requirements to CFSA, CSSD, and the OAG

I have on many occasions expressed deep concerns that referrals to CFSA, CSSD and OAG for unexcused absences are not only an ineffective way to address attendance issues, but are diverting resources from effective interventions and might well be counterproductive. Referrals are very resource intensive and do not seem to be providing the safety net to catch families in crisis. Year after year, nearly all children referred to CFSA for educational neglect were either screened out (never investigated because CFSA did not suspect neglect) or have been found to be unsubstantiated.¹¹ Over the past several years, the Family Court has returned the overwhelming majority of the students back to the referring schools for “failure to demonstrate efforts to intervene and abate the truancy.”¹² Further, the OAG recently reported receiving over 1,300 referrals for truancy cases in SY2016-2017.¹³ Only 14 percent of those case referrals were actually filed in court—of which 73 percent were dismissed.

I have also previously recommended that the District collect data to determine if these referrals are having a positive effect. The District now has this data about subsequent reenrollment and truancy patterns of DCPS students.¹⁴ DCPS found that of the students referred to CFSA in SY2014-2015 who reenrolled the following school year, 64 percent ended up being truant again in SY2015-2016.¹⁵ With regard to court referrals,

of the students referred to the court system in SY2014-2015 who reenrolled the following school year, 72 percent were truant again during SY2015-2016.¹⁶ Overall, 62 percent of the DCPS students who were truant in SY2014-2015 ended up being truant again in SY2015-2016.¹⁷

This data shows that the referral system is not an effective way to reduce truancy. We believe this is because these agencies are not well-positioned to address the underlying barriers to school attendance. Instead, schools are the appropriate first line of intervention to address such barriers. Unfortunately, many lack adequate resources to do so. Therefore, I recommend that the Council shift resources away from the ineffective referral process we currently have in place and allocate those resources to school- and community-based supports.

Reasons for Truancy & Interventions to Address Them

Students miss school for many different reasons. “Researchers typically group the factors that impact school attendance into four categories: student factors, family factors, school factors, and community factors.”¹⁸

1. Student factors include substance abuse issues, unmet mental and physical health needs, lack of positive peer relationships at school, boredom in class, learning disabilities, academic difficulties, and parenting or pregnancy.¹⁹

2. Family factors include children staying home to care for siblings or sick adults, parental substance abuse, residential instability, weak parenting skills, and differing attitudes towards education.²⁰
3. School factors include school climate issues, improper class placement, inconsistent procedures for dealing with absenteeism, uninteresting curriculum, insufficient counseling and guidance staff, and overuse of suspensions and expulsions.²¹
4. Community factors include inadequate provision of transportation, high incidence of criminal activity, and loss of neighborhood schools.²²

The District has gathered some data about causes of truancy in DC. DCPS reported that in school year 2015-2016, the following were generally reported barriers in Student Support Team (SST) notes: academic concerns, health, family issues, clothing, day care, “parentified” students, executive life management issues, and transportation.²³ Some Show Up, Stand Out middle school participants shared multiple reasons for not attending school, and we list the top 11: 29% poor academic performance, 29% suspended from school, 29% problems with a teacher or school personnel, 14% behind in coursework, 12% commute from two homes, 10% bullying, 8% no reliable way to get to school, 8% homeless or unstable housing, 6% too far to go, 6% no money for transportation, 6% tending younger siblings.²⁴ Recent data about DC seems similar to national research.

For many of our clients, multiple factors impact their ability to attend school and classes. The rest of my written testimony highlights some causes that are particularly troublesome for our clients, followed by proposed solutions. I also discuss some interventions currently in place in the District that are meant to focus on addressing the root causes of truancy.

Anxiety, Depression, and Trauma

For many years, we have represented children and youth with significant mental health needs that make attending and functioning in school a significant challenge. The fact that a child finds attending class or school more and more challenging is often a red flag that the student has unaddressed or increased mental health concerns. For children and youth, mental health issues and the trauma they have experienced cause symptoms ranging from difficulty concentrating, to panic attacks, and even severe manifestations like agoraphobia and difficulty leaving the house due to depression or anxiety. In our experience, the causes of these increased mental health problems vary. Some of the youth we have worked with have suffered acute trauma from such serious events as witnessing a murder, a serious car accident, persecution in a home country from which they are seeking refuge, or been removed from family to foster care. Others have chronic trauma or stresses, such as watching a loved one get progressively more ill, multiple moves while in foster care, or years of school failure that lead to low self-esteem and depression.

Too often, the response from schools is one-size-fits-all, rather than the individualized plan for services that responds to the child's and family's specific circumstances. We commonly see "Attendance Contracts," for example, that reiterate that the student should attend school, but offer little or no additional support. Most of these contracts lay out consequences, but don't address the reason for the child's absence and thus lack services or incentives.

Solution: Robust and Wrap Around Mental Health Services

What students with significant mental health concerns need are wrap around mental health services and creative, positive school-based strategies. The District's mental health system is extremely complicated and fragmented. This leads to a shortage of providers, resulting in many children failing to get important treatment or facing long delays that impair their health and often lead to school absences. Parents and guardians are unable to navigate this complex system, leading children to spiral into crisis when their mental health needs go undiagnosed and untreated. When other professionals working with children on attendance issues (teachers, principals, social workers, child welfare staff, and judges) identify potential mental health services, they have few quality, immediately available services to which to refer children and families.

One of our clients, Mark,²⁵ had such difficulty leaving the house after a traumatic event that he and his mother needed a clinician available to them in the early morning hours. Even after Mark was linked with a Department of Behavioral Health (DBH)

Core Service Agency, those services were not offered. Many other clients have escalating attendance and emotional crises during the months they sit on long waiting lists for the few high-quality trauma treatment providers in the community. DCPS, PCS, and DBH are implementing some evidence-based mental health services at schools—DCPS more universally than ever before—but the District needs a more comprehensive school-based mental health plan and good implementation. More school-based mental health services are a key solution, but need to be paired with treatment that is available even if a student is unable to get to school.

Solution: Creative Individualized Strategies in a Plan

Students suffering from trauma and mental illness also need creative school-based solutions. Friendship PCS and Cesar Chavez PCS deserve applause for their creative work this past year with two students we work with who have complex trauma histories, depression, PTSD, and other diagnoses. These schools have implemented innovative positive check-ins via text, positive greetings with the parents at drop off, early morning basketball with trusted staff to ease the transition, home visits, home instruction, video chats, and many other strategies. Sadly, such creativity with individualized plans to overcome the child's specific barriers is not the norm for our clients.

Difficulty Accessing Meaningful Home and Hospital Instruction

Home and hospital instruction is a legally required option for students who cannot attend school because of qualifying medical reasons.²⁶ Most children who need home or hospital instruction are denied these services until their parents find legal assistance. Two main groups of students need home or hospital instruction: pregnant and post-partum teens and youth with significant mental or physical health problems that prevent them from attending school.

Too often, students who need an instructor to come to the home are denied the service or the service is delayed for long periods. Parents are not given full information about how to request or receive it, wait long periods without hearing an answer from the LEA, or are wrongfully denied the home instruction. Doctors with whom we work send families to us when they are concerned that students, for whom they correctly submit the required paperwork, are at home with no instruction or only getting work packets.²⁷ When this happens, parents do not know what to do and students are still not able to attend school. Even for children who are approved for home instruction, often it takes weeks to arrange for the teacher to start coming and the teacher is only scheduled to come for two or three hours per week, which is not enough time to help in all courses. The students end up falling behind in school, which causes many to become disengaged and not want to return to school or become hopeless about graduating.

Solution: Deadlines and Clear Procedures for Home or Hospital Instruction in the Law

DC law should set a five-day deadline for the LEA to approve or deny home or hospital instruction requests. The law should also set a deadline for services to begin after receiving certification from a medical professional that the child's medical (including mental health) condition is too severe to attend school, as do many other states.²⁸ In addition, DC law should set minimum hours of instruction, which is done in many other states, as well. We suggest a minimum of five hours per week for elementary and ten hours per week for high school students. Parents and students should also be given a forum to quickly appeal a denial or failure to provide timely services, so that students can get the instruction they need. With clear deadlines and procedures for home and hospital instruction, students with significant needs will have access to more meaningful instruction to keep up and stay connected in school.

Inadequate Special Education Services

Our experience supports the research: we have found that unmet special education needs are a key cause of truancy and chronic absence from class. Many youth are unfortunately years behind in reading, writing, and math, but they are either not identified for special education or their special education services are too minimal to meet their needs for individualized help. These students cannot keep up in class and experience stigma and lower self-esteem for it. At times these students cope with those feelings by avoiding class, where they feel like failures. Other students are

overwhelmed by classrooms that have too much noise and activity, and they cannot concentrate to learn without a smaller setting that is not readily offered by the LEA. Their unaddressed learning needs lead to emotional problems and dysregulation in class. In some cases our clients go to school, but then roam the hallways because they cannot attend class. We have seen some of these students referred to CFSA or the court because schools mark them absent even though they are in the school building.

Solution: For a student in special education, not attending school or not attending classes should trigger a re-evaluation

Under special education laws, schools must meet the unique needs of each student with a disability. Schools are also required to revise the child's Individualized Education Program (IEP) when the child has new or changed needs.²⁹ When a student is unable to get to school or class, this is a red flag that something has changed and the student's educational needs should be re-assessed. Unfortunately parents are often told by LEAs that their child must start attending classes before he or she will be re-evaluated. This fails to address the underlying problem for students who have disengaged because they are unable to learn with the current level or type of special education services. A change in DC law to state that not attending school or class for five days must trigger a re-evaluation of the student and a meeting to revise the IEP with new strategies to meet the child's needs would greatly help students get appropriate services.

Solution: For a student not yet eligible for special education, chronic truancy should trigger an evaluation for special education

When a child with an undiagnosed disability has been getting no special education services, they have even greater difficulty attending school than children who have inadequate IEPs. Truancy is often a symptom of a serious underlying problem: that a child is years behind in school. Many truant students we meet are in middle and high school, but read at mid-elementary school levels, and they are not getting the special instruction needed to teach them to read and help them in their classes. Schools tell parents and students that the school can do nothing until the child is consistently attending class, which is not true. Public schools in DC have a legal obligation, colloquially called "Child Find," to locate and evaluate students who are not attending school.³⁰ Evaluations for learning and emotional disabilities can, and should, be performed for children who are having difficulty attending school. DC should change its special education law to require evaluation to determine whether the student has special education needs once the student has a certain number of unexcused absences, unless the school knows that the barrier for that student is a specific home or community factor.

Safety Concerns at School and Bullying

Although the vast majority DC LEAs have compliant Bullying Policies as a result of the Citywide Youth Bullying Prevention Task Force,³¹ we still have clients who suffer

from bullying or violence in school or who have been victims outside of school and the offender attends the same school. Over the past few years, we have had students targeted and injured at school by other students. Many times, these students become afraid to return to their school, leading them to become a truancy statistic.

Solution: Make safety transfers easier for students who want them because of bullying or being a victim of threats or violence at school

We have had clients who were victims of violence or bullying in their schools who would feel safe attending another school. We have requested safety transfers as a solution. Unfortunately, the regulations for safety transfers are overly restrictive, and requests are too often denied. Safety transfers should be a possibility for students who need them to feel safe to attend school.

Truancy Interventions in the District

Student Support Teams (SSTs)

Evaluations of truancy prevention programs and interventions have found that in order to be successful specific efforts must be made that prioritize student and family engagement.³² These research findings prompted several states to adopt anti-truancy models that provide students with an intervention plan tailored to the youth's individual needs.³³ One such intervention, Student Support Teams (SSTs), is already supposed to be in place in the District. However, we have concerns that the SSTs in DC need resources to provide robust and meaningful interventions and services.

The SST, which is required to meet when a student reaches five unexcused absences, is “a team formed to support the individual student by developing and implementing action plans and strategies that are school-based or community-based, depending on the availability, to enhance the student’s success with services, incentives, intervention strategies, and consequences for dealing with absenteeism.”³⁴ It is heartening to see that DCPS has greatly increased the number and percentage of SST meetings that it convenes for students. However, the continued high numbers of referrals to CFSA and the court show we need to do more to ensure SSTs are uncovering the root causes and providing meaningful services or interventions prior to CFSA and court referral. Therefore, I recommend requiring OSSE to collect data from schools on common barriers to school attendance that are identified during the SST process, about the interventions provided in the SST plans, and about services actually provided versus services referred but not started, which should be included in OSSE’s annual report on the state of absenteeism in the District.

Additionally, I urge the Council to amend the law to require meaningful school- or community-based intervention before students can be referred to CFSA, CSSD, or OAG.³⁵ Students and parents need a forum, such as OSSE’s Office of Dispute Resolution, to appeal to if the school is not providing needed or promised services and strategies to reduce a student’s truancy, to ensure those services happen. I further recommend that the Council amend the law so that a school’s failure to conduct an SST

meeting and provide appropriate school- and community-based supportive services prior to making a court referral, is an affirmative defense to truancy petitions.

Diversion Programs: ACE and PASS

The District also has other programs and initiatives operating under interagency coordination, including the Alternative to the Court Experience (ACE) Diversion Program and the Parent and Adolescent Support Services (PASS) Program. ACE offers a range of diversion services, including behavioral health treatment, as alternatives to prosecution for youth who are facing truancy or delinquency charges. In FY2016, 90 percent of the youth who completed ACE made significant improvements in their overall functioning, and 52 percent improved their school attendance rates.³⁶ PASS, run by the Department of Human Services (DHS), services District families of youth who are committing status offenses, including truancy. In FY2016, 81 percent of the youth who completed PASS saw significant improvements in their overall functioning, and 94 percent improved their school attendance rates.³⁷ As you can see, both programs are showing great success, and we applaud the Council for continuing to fund their efforts.

Conclusion

Thank you both for continuing to champion this issue and for bringing us all here today to discuss this important topic. I look forward to our continued work together to ensure that our students are in school every day and succeeding.

¹ Children’s Law Center fights so every child in DC can grow up with a loving family, good health and a quality education. Judges, pediatricians and families turn to us to be the voice for children who are abused or neglected, who aren’t learning in school, or who have health problems that can’t be solved by medicine alone. With 100 staff and hundreds of pro bono lawyers, we reach 1 out of every 9 children in DC’s poorest neighborhoods – more than 5,000 children and families each year. And, we multiply this impact by advocating for city-wide solutions that benefit all children.

² District of Columbia Public School, Annual Truancy Report – September 2017. Retrieved from <http://lims.dccouncil.us/Download/38688/RC22-0086-Introduction.pdf>.

³ https://dcps.dc.gov/sites/default/files/dc/sites/dcps/page_content/attachments/dcps_csm_hs_2018.pdf

⁴ See The Washington Post (July 17, 2017), “Some D.C. high schools are reporting only a fraction of suspensions.” Retrieved from https://www.washingtonpost.com/local/education/some-dc-high-schools-reported-only-a-small-fraction-of-suspensions/2017/07/17/045c387e-5762-11e7-ba90-f5875b7d1876_story.html?nid&utm_term=.52caeeaf99b1.

⁵ We have changed our client’s name to protect confidentiality.

⁶ The Washington Post (July 17, 2017), “Some D.C. high schools are reporting only a fraction of suspensions.” Retrieved from https://www.washingtonpost.com/local/education/some-dc-high-schools-reported-only-a-small-fraction-of-suspensions/2017/07/17/045c387e-5762-11e7-ba90-f5875b7d1876_story.html?nid&utm_term=.52caeeaf99b1.

⁷ D.C. Law 21-140, effective July 26, 2016.

⁸ D.C. Code § 38-208(c)(1)(A) and § 38-208(c)(1)(B).

⁹ 5 DCMR A § 2101.3, 2103.5, 2199.1 definition of “Absence,” “Partial School Day,” and Present.”

¹⁰ Some of the policies inaccurately state the DC Code requires referral for missing 20% or more of the day.

¹¹ In SY2013-2014, 96% of case referrals were unsubstantiated; see CFSA FY14 Performance Oversight Responses, Q22. In SY2014-2015, 97% of case referrals were unsubstantiated; see CFSA FY15 Performance Oversight Responses, Q29. In SY2015-2016, 97% of case referrals were unsubstantiated; see CFSA FY16 Performance Oversight Responses, Q14.

¹² In 2014, 87% of case referrals were returned to the school; see Superior Court of the District of Columbia, Family Court 2014 Annual Report, March 2015. Retrieved from <https://www.dccourts.gov/sites/default/files/divisionspdfs/Family-Court-2014-Annual-Report.pdf>. In 2013, 75% of case referrals were returned to the school; see Superior Court of the District of Columbia, Family Court 2013 Annual Report, March 2014. Retrieved from <https://www.dccourts.gov/sites/default/files/divisionspdfs/Family-Court-2013-Annual-Report-to-Congress.pdf>.

¹³ Office of the Attorney General, “Truancy Status Report for School Year 2016-2017” provided to the DC Council, July 19, 2017. Retrieved from <http://lims.dccouncil.us/Download/38617/RC22-0065-Introduction.pdf>.

¹⁴ While this only represents reenrollment and truancy pattern data from DCPS, we have very little doubt that referrals from our public charters schools are any more efficient.

¹⁵ DCPS FY16 Performance Oversight Responses, Q57.

¹⁶ DCPS FY16 Performance Oversight Responses, Q57.

¹⁷ DCPS FY16 Performance Oversight Responses, Q57.

¹⁸ DC Lawyers for Youth and Children’s Law Center, “How DC’s Truancy Policy Fails Students, and Steps to Turn it Around” (March 2015), 6, http://www.dclj.org/how_dc_s_truancy_policy_fails_students_and_steps_to_turn_it_around, citing Tonisha Jones and Nicholas Lovrich, *Updated Literature Review on Truancy: Key Concepts, Historical*

Overview, and Research Relating to Promising Practices – with Particular Utility to Washington State (Center for Children and Youth Justice, June 30, 2011), 10, <http://www.ccyj.org/uploads/PPO/WSU%20Literature%20Review.pdf>.

¹⁹ *Ibid.*, 67.

²⁰ *Ibid.*, 68–69.

²¹ *Ibid.*, 68.

²² *Ibid.*, 69.

²³ DCPS FY16 Performance Oversight Responses, p. 68. DCPS data from the first semester of the 2013-14 school year is the most recent specific data we can find. It identified the student’s health as a barrier in 11% of cases, academics in 8% of cases, transportation in 6% of cases, the parent’s health in 2% of cases, and school safety in 1% of cases. *See* DCPS FY13 Performance Oversight Responses, Q87–88. Note that the Public Charter School Board does not compile data on the causes of truancy identified in SST meetings in its schools, or indeed whether SST meetings are held at all.

²⁴ Show Up, Stand Out, Year 4 (2015-16) Middle School Program Evaluation Findings; *see* DCPS FY16 Performance Oversight Responses, Q56 Attachment.

²⁵ Name and some details have been changed to protect confidentiality.

²⁶ Section 504 of the Rehabilitation Act of 1973, the Individuals with Disabilities Education Act, and Title IX are sources of law that give students rights to home and hospital instruction.

²⁷ Our clients with valid physician certifications are routinely denied services by DCPS, despite the fact that no other licensed medical professional has issued a competing opinion of the child’s need.

²⁸ *See* COMAR § 13A.03.05; 14 Del. Admin. Code § 930; Reg. Conn. State Agencies § 10-76d-15; 8 NYCRR § 200.6(h)(8)(i); N.J.A.C. § 6A:16-10.2.

²⁹ *See* 34 CFR § 300.324(b).

³⁰ *See* 34 CFR § 300.111.

³¹ Office of Human Rights & Child Trends (January 12, 2017). *Youth Bullying Prevention in the District of Columbia: School Year 2015-2016 Report*.

³² Mallett, C. (2016). *The school-to-prison pipeline: A comprehensive assessment*. New York: Springer Publishing Company.

³³ Neild, R. C., Balfanz, R., and Herzog, L. (October 2007). An early warning system. *Educational Leadership*, 65(2), p. 29-30.

³⁴ D.C. Code § 38-201(3B).

³⁵ Colorado has done something similar to this. In 2013, the state legislature established procedural requirements for schools to demonstrate interventions attempted before resorting to referrals; *see* Colorado Revised Code § 22-33-107(3)(4p).

³⁶ DME FY16 Performance Oversight Responses, Q7 Attachment. Data for overall functioning is measured by the Child and Adolescent Functional Assessment Scale (CAFAS).

³⁷ DME FY16 Performance Oversight Responses, Q7 Attachment. Data for overall functioning is measured by the Child and Adolescent Functional Assessment Scale (CAFAS).