While Dr. Allsopp’s paper “Realizing the Potential: How Comprehensively Are Schools Implementing RtI?” has many compelling points, it also raises many questions. What I would like to do is discuss why, using his words, “we have a long way to go” and review some important considerations along the way.

**First let’s address the topic of High Quality Tiered Instruction.**

Allsopp says “progress...has been made in delineating effective reading/literacy tiered instruction practices...” (p.8)

The earliest rationale for RtI was that high quality reading instruction is paramount and that all students can learn to read if they are properly taught. We recognized that children develop differently and that utilizing one model for all students in a classroom was not teaching to each child’s needs. We suspected that too many children were being identified for special education simply because they weren’t taught to read in a way that worked for them. This was pretty easy for people to understand and made good sense. What makes less sense is that we generalized this into all content areas at all levels at the same time.

Canvassing my constituents in Colorado, preschools have had much success incorporating tiered instruction and allowing children to move easily among the tiers. I believe their success is due to two things. First, preschools operate knowing that children of a certain chronological age develop differently, thus they teach to individual differences naturally. Second, systems change may not be as necessary or cumbersome at this level because Part C service coordinators, Child Find, preschools and families already work more collaboratively. Fewer silos?

As to content areas, Dr. Allsopp says that there is not enough evidence-based curriculum to implement RtI successfully and satisfy the standards of high quality teaching.

For example, Allsopp says there is a (p.7) “shotgun approach to teaching and learning mathematics - address the needs of some but miss the needs of others”. This condition is proof of his assertion that schools cannot be “getting the best instruction to all students early to bring about the best educational outcomes possible for each individual.” (p.2)

As a result of these factors, implementation in all but a few districts -- the districts I would call the exception -- where strong leaders have brought about the necessary changes, will require a more controlled roll out to insure best practices at all levels and in all content areas.
Research to practice

Allsopp asserts that the research is clear on what makes the translation of research to practice more likely to occur than not, and while I agree, it seems that this translation is failing in the case of RtI.

So much research suggests that family involvement and family support is critical to student success; that family involvement has a significant impact on student behavior, learning and development, yet parents are not as involved in the RtI process as would be expected.

In district and state materials that I have seen in Colorado, parents are expected to be part of the team. In fact, in Colorado the RTI pyramid model is literally blanketed in family and community. I have no doubt that was the intent. In reality parents are complaining that they are not informed participants. In practice families are unaware of the RTI process and are not included, to the extent was intended, in the problem solving teams. What I can only believe is that in a rush to total implementation, parents have been left out. Clearly this has to change and going forward it is imperative that parents are active and informed participants in the RTI process.

Structural change

Allsopp calls for school structure to change to fully realize the benefits of RTI, yet admits that this will be difficult.

In one district where I believe RTI is working relatively well, it is being implemented in conjunction with initiatives in inclusive education, differentiated instruction, and co-teaching. Clearly this district recognizes that RTI doesn’t work within the existing model, so they are scaffolding its implementation with structures that insure success.

Again, this reiterates that for most, a more controlled phasing, or roll out is necessary to insure that RTI is successful.

Next lets address the topic of Exceptional Learners

I could not more strongly agree with Allsopp’s concern that he is “uncertain where students with disabilities and other exceptional learners fit within RtI.” The picture is quite muddled, indeed. Parents are very concerned about this and it seems that many children are falling through the cracks. This is effecting children at all different points in the system: whether they had already been identified with a Specific Learning Disability (SLD); whether they are unsure how eligibility will be determined, or a lack of understanding how services will be delivered.
**Timeline**

In contrast to RTI, IDEA has legal rights and procedural safeguards for parents so they know what to expect, they know their rights, and they know how quickly they can expect action. RtI offers none of these safeguards. The timeline is unclear; and generally undefined.

Going forward the system needs to have timelines and safeguards to insure equality, fairness and clarity of expectations.

**Progress monitoring**

A concern that I hear universally is that progress monitoring has a long way to go to for RTI to work smoothly. Parental complaints in this area are many, but so are the concerns from school and district personnel. Among complaints that have been shared with regard to progress monitoring are:

- It is difficult accessing tiers and evaluations;
- The process is keeping students from accessing appropriate instruction;
- Parents are watching their children experience a “wait to fail;”
- Parents are asking for evaluations but they are forced to wait longer than seems reasonable;
- Parents are frustrated because they don’t know how progress monitoring results are being used;
- Parents don’t know how to judge if progress is being made;
- The standards are difficult to understand, therefore it is hard to know what to expect;
- Parents are looking for students to make progress, but are unsure how they will know when it is achieved.

All of these scenarios indicate that progress monitoring is operating far from its intent and that there is a great deal of work to do in this area.

**Twice exceptional**

From the earliest literature about RTI, there was always a cautionary note that twice exceptional students could fall through the cracks most easily. This is confirmed to be the case by many parents and agents of parents with whom I have spoken. The tiered
system does not allow for students who are averaging out to look successful in school, but are truly at the highs and the lows, and deserving of support.

As the parent of a child who had this profile, I am confident saying that the system has to do a better job in identifying these students and getting them access to the appropriate educational support.

Decreased identification

Allsopp wonders if the intent of increased accuracy has taken a back seat to the intent of reducing the number of students identified with disabilities and providing identified students with appropriate services. This is consistent with what I am hearing.

Schools can use RtI as a way to avoid a full evaluation. Some schools are using RtI progress monitoring in lieu of evaluation. Some schools are telling parents that RtI is the evaluation process.

There clearly are incentives that reinforce decreasing the number of students identified and these incentives are geometrically compounded in this era of fewer and fewer resources. Going forward we need to ensure that districts are incented to PROVIDE, not deny, support services to students who need them,

Finally, let’s discuss the integrity of implementing what was Intended.

I agree with Dr. Allsopp’s contention that RtI is about all students getting the best instruction early, to bring about the best educational outcomes for each individual student. This is what must drive implementation and practice. It seems that this was the appeal of RtI -- it makes sense.

Dr. Allsopp’s concerns about the intent getting lost in vastness of universal implementation is consistent with what I am hearing, and what I suspect most of you are seeing, from the field.

Conclusion

IN CONCLUSION, if RTI is going to succeed, a great deal of work must be done to ensure that it addresses the needs of the students that it was designed to serve.

In doing so, critical issues that must be addressed include:

The RTI rollout must be done in a more controlled and deliberate manner in order to insure best practices at all levels, including a strong component of accountability.

Parents must be brought into the process in a far more meaningful way than we see today
We must encourage district, school and classroom level structural change for RTI to be as successful as intended.

Process timelines and parental safeguards need to be clarified and solidified.

The incentives to decrease identification and essentially deny services to students who need them must be reversed.

A systematic way to identify children with special needs, including twice exceptional children, must be found.

Thank you very much for your attention.