

# **RIPIN 2024 Policy Forum**

## **Preliminary Report and Recommendations: Preschool Special Education in Rhode Island**

A collaborative approach to identifying innovative solutions, including:

- Findings from interviews with parents, educators, and advocates
- Recommendations for comprehensive improvement

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# Executive Summary

This report summarizes key findings and recommendations to guide policymakers, educators, and families toward a more equitable and inclusive early childhood special education system. The report is the result of a year-long analysis of preschool special education in Rhode Island, including dozens of listening sessions and interviews with key stakeholders, with the goal of identifying challenges and proposing systemic changes to improve access and outcomes for children with disabilities.

## Key Findings

- **Families Still Struggle to Access Services:** Many families struggle to access timely services, with limited options for full-day, full-week programs, transportation, and reliance on virtual services. Staffing shortages further exacerbate access issues.
- **Strengths to Build Upon:** Most families love the educators who support their children. Rhode Island also boasts a strong history of embedding services in inclusive settings, as well as a high-quality RI Pre-K program.
- **Resource Constraints:** The current funding framework for special education does not adequately support rising costs or best practices. The COVID-19 pandemic and its aftermath have exacerbated the strain on resources, leading to staffing shortages and funding challenges.
- **Challenging Transitions:** The transition from Early Intervention (EI) to preschool special education can be difficult due to gaps in services, procedural complexities, and coordination issues between the two systems. Despite efforts to align these systems, families often experience delays and disruptions in their child's care.
- **RI Pre-K Faces Inclusion Challenges:** Despite its potential, RI Pre-K is not yet truly designed to serve all children with disabilities. Many sites lack the resources to adequately support students with more intensive needs.
- **Itinerant and Embedded Models Need New Support Post-COVID:** Due to staffing shortages and other challenges, districts and community preschools are struggling to maintain the use of itinerant or embedded special education services.
- **The Special Education Funding Framework is Not Designed to Promote Access:** The current state funding framework for special education does not adequately support rising costs or best practices.

## Recommendations

- **Create an EI Extension Option:** Allow families to extend EI services until the September after the child's third birthday, preventing service gaps and supporting a smoother transition to preschool special education.
- **Support Preschool Special Education in the Funding Formula:** Clarify that preschool students with disabilities in community settings and RI Pre-K count in the funding formula and provide funding to LEAs accordingly. Consider incorporating a multiplier for students in preschool special education into the funding formula.
- **Strengthen Inclusion in RI Pre-K:** Ensure RI Pre-K grantees have the resources and relationships to serve children with disabilities. Invest in building pooled resources for RI Pre-K, such as specialized classrooms or mobile teams of special educators. Reinforce the message that RI Pre-K is for all kids.
- **Support Full-Day, Full-Week Options:** Amend the funding formula to support districts serving students with disabilities in community-based settings and RI Pre-K classrooms. Expand technical assistance efforts to support the itinerant model. Require all LEAs to provide transportation to/from childcare centers if full-day programs are not offered.
- **Continued Focus on Transitions:** Enhance transition training for Part C and Part B staff. Convene stakeholders to streamline the transition process and reduce paperwork burdens.
- **Refresh Teacher Training and Certification:** Revise early childhood special education certification and enhance teacher training to make the field more attractive.

## Call-to-Action

Implementing these recommendations requires a collaborative effort from policymakers, educators, families, and advocates. We urge stakeholders to work together to prioritize early childhood special education, advocate for policy changes, build partnerships with families, educators, service providers, and policymakers, and raise awareness. By working together, we can create a more equitable and supportive system of preschool special education for children with disabilities.

**Please note: This is a preliminary report. Further revisions will be made based on community input.**

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## Introduction

Last fall, RIPIN's Policy Forum focused on the need to strengthen Rhode Island's preschool special education system.<sup>1</sup> The inquiry illuminated children with disabilities struggling to access timely services in Rhode Island and challenges in coordinating the two separate but related systems of support serving children under five.

### The Process

- Five listening sessions with more than 40 parents
- Two professional roundtables
- Ten key informant interviews
- Targeted research and analysis
- RIPIN peer support to families

Following last fall's forum, with generous support from the van Beuren Charitable Foundation (vBCF) and in partnership with Conexión Latina Newport (CLN), RIPIN undertook a year-long analysis of preschool special education in Rhode Island to understand why these issues are occurring and develop policy recommendations for improvement. Our listening process included sessions with dozens of parents, educators, advocates, and key informants, incorporating a special focus on Newport County.

As RIPIN continues its ongoing work to support preschool special education parents, children, special educators, and service providers, we are honored today to bring parents together with other stakeholders in a collaborative process to share our emerging conclusions, continue listening, and highlight promising solutions.

## Findings

### KEY LEARNING ONE: ACCESS GAPS CONTINUE TO CHALLENGE FAMILIES

Families and professionals continue to share stories of challenges accessing services for (or providing services to) three- to five-year olds with disabilities. Most districts offer only part-day or part-week preschool special education services, which are difficult for working families who need to find other childcare options to cover the rest of the week. Staffing and funding shortages persist.

All these options create challenges for working families who need full-time services. Some districts only bus children round trip to their home address, making half-day programming especially infeasible for many families. We heard many stories from families who turned down half-day programming due to scheduling challenges, with their children either at home or in private childcare without receiving the services they need to close gaps with their peers.

### KEY LEARNING TWO: THERE IS A LOT FOR RI TO BE PROUD OF

Many families love the Early Intervention (EI) and preschool programs and dedicated educators who support their children. Two of out three children with disabilities who entered preschool below age expectations substantially increased their acquisition of knowledge and skills to close or narrow the gap as compared to same-age peers.<sup>2</sup>

Furthermore, Rhode Island has a strong history of providing itinerant or embedded services, sending special educators out into Head Start programs and other full-day inclusive community preschools. Rhode Island was one of the first states to adopt the itinerant model and creates best practices in accordance with the federal government's guidelines on participation in general early childhood classroom environments.<sup>3</sup>

RI Pre-K is another important asset.<sup>4</sup> The program offers high-quality inclusive early learning program at no cost to families, making it an excellent setting for children with disabilities to learn alongside their peers.<sup>5</sup> RI Pre-K currently serves over 2,800 children – 11% of which receive special education – across 20 communities in the state.<sup>6</sup>

### KEY LEARNING THREE: RESOURCES ARE TIGHT

Challenges accessing services for young children with disabilities were greatly exacerbated by the COVID pandemic and the fast-shifting labor market of the post-pandemic period. The State Fiscal Recovery Fund reported that, at one

point, almost a fifth of EI staff were turning over every six months.<sup>7</sup> Anecdotally, school districts experienced similar challenges staffing their preschool special education classrooms during this period. In early 2023, the ACLU successfully filed a class-action lawsuit against the Providence Public School District, demonstrating hundreds of children ages 3-5 were waiting months special education services or evaluations.<sup>8</sup>

While the staffing situation has stabilized to some extent<sup>9</sup> (in EI thanks largely to significant investments in reimbursement rates), newer staff in EI and preschool special education settings are not yet working at the capacity of the seasons staff they replaced and are less likely to have the strong working relationships with each other that are so critical to supporting successful transitions. Districts continue to report difficulties securing enough classrooms, providers, and resources to be able to provide timely services for all students with appropriate frequency. Districts also report that shortages of applicants and teacher certification rules that may be overly burdensome make it extremely difficult to hire qualified teachers for preschool special education classrooms.

#### KEY LEARNING FOUR: THE TRANSITION FROM EI TO PRESCHOOL SPECIAL EDUCATION IS CHALLENGING

Part C: Early Intervention	Part B: Preschool Special Education
Supports children from birth to age three	Supports children ages three to five
Administered by the Executive Office of Health and Human Services (EOHHS)	Administered by Rhode Island Department of Education (RI DE) and school districts
Nine programs serve children across the state	Children served by one of 36 local districts
Providing services in the home and other natural environments	Providing services in an academic setting
Family-focused coaching	Student-centered support
Services to meet developmental goals	Services to meet academic goals
Financed at the state level (Medicaid, private insurance, and general funds)	Primarily financed by local school budget
Eligibility based on age and birthday	Primarily academic year cycles

Under Part C of the Individuals with Disabilities Act (IDEA), Early Intervention (EI) serves children with developmental delays from birth until their third birthday. After that, Section 619 of Part B of the IDEA makes school districts responsible for special education services for children aged 3-5. While RI has implemented many best practices, the transitions from Part C to Part B – which have different eligibility rules, service models, and even foundational philosophies – are still challenging and labor intensive. Gaps in services between EI and Part B are generally avoidable but persist for two reasons. First, children with spring and summer birthdays often experience a several month gap in services between their birthday (when EI services must end) and the start of the following academic year. Second, there are many steps involved in a

successful transition – often including new evaluations – and it is easy for scheduling challenges to cause gaps.

There is consensus that strong personal relationships and mutual understanding between Part C and Part B staff are key to successful transitions, and that pandemic-era staff turnover has hurt. There is also consensus that there are opportunities to improve the efficiency of the transition process for all involved.

#### KEY LEARNING FIVE: RI PRE-K FACES INCLUSION CHALLENGES

As of 2022, 11% of RI Pre-K's 2,364 students were children with disabilities.<sup>10</sup> RI Pre-K is an incredible asset for children with disabilities. Every new high-quality inclusive environment for early childhood education is another opportunity for children with disabilities to learn with their peers. Admission to the program is lottery-based and described as open to all kids. That said, we heard many stories – from parents and professionals – that indicate that RI Pre-K can do a lot more to be truly inclusive and be ready to serve all children. RI Pre-K is a mixed delivery model that serves kids across a variety of settings including public schools, Head Starts, and private preschools. The ability of each location to support children with disabilities varies widely.

Worryingly, it appears common knowledge that many parents of “higher need” kids are sometimes discouraged from applying for RI Pre-K. For families, this can create an impossible choice between a full-day RI Pre-K program – that might not have appropriate supports available – and a half-day district-based preschool special education

classroom. It is common to hear stories from families and RI Pre-K operators of families who choose the full-day program, with everyone aware that the child is missing out on services they need.

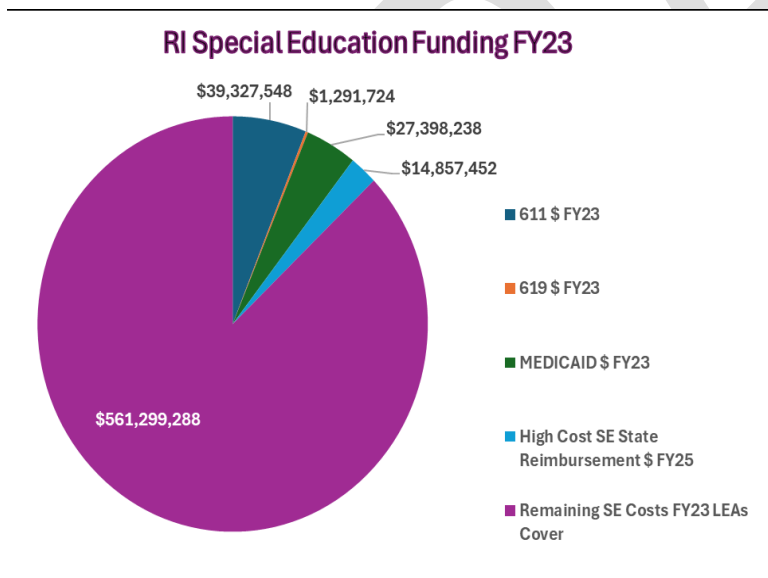
RI Pre-K also does not yet include appropriate funding for districts that need to provide special education services to RI Pre-K students. When a child is served in RI Pre-K, they are not counted in the school census that drives the funding formula. However, the district must pay for the cost of special education services when the child is served in RI Pre-K. As RI Pre-K grows, this is not a sustainable framework.

### KEY LEARNING SIX: ITINERANT OR EMBEDDED MODLES NEED NEW SUPPORT POST-COVID

Rhode Island should be proud of its historical commitment to the best practice of providing itinerant or embedded special education services in inclusive community-based preschool settings. Despite our strong history with this model, interviews indicated anecdotally that districts and community preschools are struggling to maintain it. Staff shortages and turnover have made it difficult for districts to send special educators out into the community, and have also made it difficult for community-based preschools to staff classrooms with teachers ready to collaborate with special educators and support students with disabilities.

Rhode Island's school funding formula also does not appropriately support districts that provide embedded or itinerant services. While students served in this model do count in the IDEA census, that census drives little or no funding. RIDE has not taken a position on whether these students count in the average daily membership (ADM) that drives school funding formula dollars, and experts believe that practice between districts varies. Districts are responsible for the costs of providing special education to these students. To the extent these students are not included in the funding formula, this disincentivizes districts from participating in this best practice model.

### KEY LEARNING SEVEN: THE SPECIAL EDUCATION FUNDING FRAMEWORK DOES NOT PROMOTE ACCESS



School districts directly fund most special education. On average, districts funded 87% of special education from their local education budget or from flexible state aid, with only 13% of costs covered by state or federal dollars earmarked for special education.<sup>11</sup> With only the exception of the high-cost categorical funding, districts are on the hook when special education costs go up and save when costs go down.

Unlike poverty or multilingual learner counts, there is no funding formula factor that provides more state funding to districts that serve more students with disabilities or spend more serving them.

The only additional funding available at the state level is a high-cost categorical that partially reimburses districts to the extent that a district's cost educating a student exceed four times the core foundation amount (~\$75,000 per year currently).<sup>12</sup> The reimbursement comes two years after the cost is incurred and, if the state does not allocate enough funds to cover the cost, the districts receive a percentage of their claims against the pool.<sup>13</sup> The accounting and data reporting required to support claims against the high-cost categorical pool are also onerous for districts. At least forty other States utilize other mechanisms to provide State support for special education funding, including multipliers for per-pupil funding and/or reimbursing percentages of district special education spending.<sup>14</sup>

# Recommendations

## CREATE AN EI EXTENSION OPTION

We recommend that RI allow families to extend EI until the start of the school year following the child's third birthday, as allowed under federal law.<sup>15</sup> An EI extension option would prevent gaps in services between EI and Part B by allowing children with spring or summer birthdays to continue EI through the summer. It would also allow EI to serve as a backstop when the Part B transition process is not complete in time for the child's third birthday.

There is an existing federal framework and guardrails for states seeking to extend EI services, and there is also dedicated federal funding set aside to support EI extension states.<sup>16</sup> Federal rules require that all children still be

EI Extension States	Adopted	Applies To Children With:	Children May Extend Until the School Year:
Colorado	2022	Birthdays after 5/1	Following their 3 <sup>rd</sup> birthday
Connecticut	2021	Birthdays after 5/1	Following their 3 <sup>rd</sup> birthday
Maryland	2013	All children	Following their 4 <sup>th</sup> birthday
Missouri	2014	Birthdays from 4/15-8/15	Following their 3 <sup>rd</sup> birthday
Tennessee	2022	All children	Following their 5 <sup>th</sup> birthday
Washington, DC	2014	All children	Following their 4 <sup>th</sup> birthday

evaluated for Part B before their 3<sup>rd</sup> birthday, with eligible families given a choice between EI extension and district-based special education. Preliminary modeling suggests this can be implemented very affordably in Rhode Island.

Any EI extension plan would have to be cognizant of current capacity challenges in the EI system. We recommend a two-year planning period followed by a slow, multi-year roll-out. Preliminary modeling based on data from other EI expansion states indicates that such an expansion would require RI's EI system to grow capacity by a total of about 5-10% over the multi-year roll-out period.

## SUPPORT PRESCHOOL SPECIAL EDUCATION IN THE SCHOOL FUNDING FORMULA

First, Rhode Island should clarify that preschool students with disabilities served in community settings count in the funding formula census. Similarly, RI should provide funding to LEAs to support students with disabilities served in RI Pre-K. Rhode Island's current funding framework wrongly disincentivizes these best practice models.

Rhode Island should also consider amending the education funding formula to include a multiplier for students in preschool special education. The funding formula already acknowledges that it takes extra resources to educate low-income students and multi-lingual learners, but it does not do so with respect to students with disabilities. Thirty-six states include special education students in their primary funding model.<sup>17</sup> Rhode Island does not. There are numerous models for improved state support for special education from which to draw, and the preschool population would be an excellent place to start.

**Thirty-six states include special education in their primary funding model. Rhode Island does not.**

## RI PRE-K MUST BE STRENGTHENED TO SUPPORT INCLUSION FOR CHILDREN WITH DISABILITIES

While RI Pre-K is advertised as a lottery-based program ready to serve children of all abilities, more can be done to make that promise a reality. First, we would recommend that RIDE be more proactive in ensuring that all RI Pre-K grantees genuinely have the resources and relationships in place to serve any student who may be awarded a seat in the lottery. This could include, for example, requiring community-based grantees to have MOUs in place with their local school districts outlining their plans for providing services to students with disabilities served by the program. We recognize that this kind of oversight might inhibit some operators from participating, and believe that establishing a foundation of equity for children with disabilities should be the prevailing priority.

We also recommend that the state re-emphasize in family-facing and operator-facing communications that every RI Pre-K program must be equipped to serve all kids, including those with any type of disability. There is a growing public perception – amongst families and operators – that RI Pre-K is not the right setting for many children. Some stakeholders view RI Pre-K as a *general* education (rather than a *special* education) program. This perception must be overcome. RI Pre-K is an *education* program that must equitably serve all kids with all needs, and that message must start from the top.

We also recommend that the state consider pooling resources at the state or regional level to support children with disabilities in RI Pre-K. This could include specialized classrooms with state-wide or regional catchment areas for children with low-incidence needs. It could also include teams of special educators or related services providers who help provide embedded services in community-based RI Pre-K classrooms in certain districts. The state may already be pursuing some of these promising opportunities.

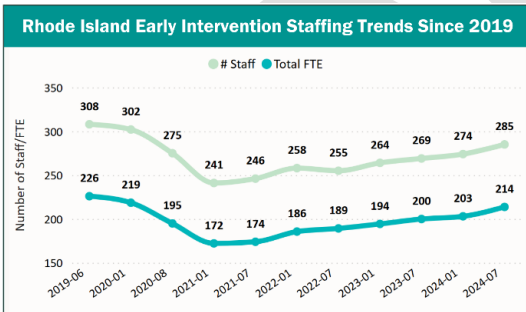
RI Pre-K Participation By LEA



### SUPPORT FULL DAY, FULL WEEK OPTIONS

Three initiatives would increase the number of full-day, full-week options for parents. First, the funding formula should be amended to support districts serving students with disabilities in community-based settings and RI Pre-K classrooms (see funding recommendation). Second, the state should expand technical assistance efforts to allow new LEAs to participate in the itinerant model and reengage districts who stopped providing itinerant services during the pandemic. Recommendations include creating a team of coaches at the state level to train teachers in the itinerant model and working with local teacher certification programs to increase student teacher preparation. Third, Rhode Island should require all LEAs to provide transportation to/from other childcare centers when not offering full day programming. This ensures that working parents do not have to turn down part-time programs in favor of full-time private options at their own expense.

### CONTINUED FOCUS ON TRANSITIONS



Source: EOHHS Early Intervention Data Dashboard

Given the recent turnover of Part C and Part B staff, enhancing support for transition training is essential. Creating strong personal relationships between Part C and Part B staff facilitates smoother transitions. Part C and Part B coordinators must have a strong understanding of not only their duties regarding the transition, but their counterparts' roles.

The Sherlock Center at Rhode Island College is a technical assistance partner to the state's EI program, with special expertise on transitions EI to Part B. For about 15 years they have convened a regular professional development forum between EI and Part B staff in Northern Rhode Island that offers a promising model to be replicated and reinforced.

We also recommend that EI and Part B stakeholders convene to consider new efficiencies in a transition process that most agree is overly burdened with resource-intensive paperwork. Implementation of an EI extension option as discussed above would also require some reform to transition processes.

### INCREASE FLEXIBILITY IN TEACHER TRAINING AND CERTIFICATION

The state should consider expanding grade certification ranges for early childhood special educators to make that certification more attractive to aspiring educators and to hiring districts. Currently, early childhood special educators are licensed to instruct children from birth to second grade. Elementary special educators are licensed to instruct

children in 1<sup>st</sup> grade through 6<sup>th</sup> grade. Anecdotally, districts prefer to hire teachers with the 1<sup>st</sup> to 6<sup>th</sup> grade certification because of the greater flexibility it provides, and aspiring teachers are also more attracted to the certification that creates a pathway to more job opportunities.

As of Fall 2024, RIDE is actively considering a regular revision to its teacher certification framework. We recommend that RIDE lean towards more flexibility in teacher certification rules to accommodate the realities of today's workforce. For example, proposals to allow certified and experienced teachers an expedited pathway to teach adjacent grade levels make sense, for general and special educators alike. We also urge RIDE to ensure that the preschool special education certification becomes more attractive to aspiring teachers and to districts.

There are also only two programs in the state offering Early Childhood Special Education licensure, creating opportunities to increase the capacity to train special educators. Incentivizing dual certification for early childhood general and special education increases the opportunity for children with disabilities to participate in general early childhood classroom environments.

## Conclusion

Based on our work with families, we know that access gaps still exist for too many children aged 3-5 who need special education services. After a year of dedicated research, listening to families, and interviewing key stakeholders, we hope that this brief and convening have helped to illuminate both strengths and opportunities to improve Rhode Island's preschool special education system. We look forward to continued collaboration with all stakeholders in the coming years to make this vision a reality.

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<sup>1</sup> RIPIN. (2023). (issue brief). *Ensuring Access to Preschool Education* (pp. 1–4). Providence, Rhode Island.

<sup>2</sup> Office of Special Education Programs, State Performance Plan / Annual Performance Report Part B: for State Formula Grant Program under the Individuals with Disabilities Education Act. For reporting on FFY 2022 Rhode Island (2024), p. 44-48 Retrieved from [https://ride.ri.gov/sites/g/files/xkgbur806/files/2024-06/SPP\\_AnnualPerformanceReport\\_FFY22.pdf](https://ride.ri.gov/sites/g/files/xkgbur806/files/2024-06/SPP_AnnualPerformanceReport_FFY22.pdf).

<sup>3</sup> Rhode Island Department of Education. (n.d.). Participation in General EC Programs. Participation in General EC Programs | RIDE.

<sup>4</sup> RI Children's Cabinet, Report and Recommendations on RI Pre-K Expansion (2022). Retrieved from [https://kids.ri.gov/cabinet/documents/Report%20and%20Recommendations%20on%20RI%20Pre-K%20Expansion\\_12-30-22.pdf](https://kids.ri.gov/cabinet/documents/Report%20and%20Recommendations%20on%20RI%20Pre-K%20Expansion_12-30-22.pdf).

<sup>5</sup> RI Children's Cabinet, Report and Recommendations on RI Pre-K Expansion (2022). (p. 3). Retrieved from [https://kids.ri.gov/cabinet/documents/Report%20and%20Recommendations%20on%20RI%20Pre-K%20Expansion\\_12-30-22.pdf](https://kids.ri.gov/cabinet/documents/Report%20and%20Recommendations%20on%20RI%20Pre-K%20Expansion_12-30-22.pdf).

<sup>6</sup> *RI Pre-kindergarten*. RI Pre-Kindergarten | RI Department of Education. (n.d.). <https://ride.ri.gov/instruction-assessment/early-childhood-education/ri-pre-k>; RI Children's Cabinet, Report and Recommendations on RI Pre-K Expansion (2022). (pp. 15-16). Retrieved from [https://kids.ri.gov/cabinet/documents/Report%20and%20Recommendations%20on%20RI%20Pre-K%20Expansion\\_12-30-22.pdf](https://kids.ri.gov/cabinet/documents/Report%20and%20Recommendations%20on%20RI%20Pre-K%20Expansion_12-30-22.pdf).

<sup>7</sup> Senate Fiscal Office. (2022, April 4). *Governor's FY2023 and FY2022 Supplemental Budget ARPA State Fiscal Recovery Funds*. State of Rhode Island General Assembly. <https://www.rilegislature.gov/sfiscal/Budget%20Analyses/FY2023%20SF0%20Governor's%20Budget%20Analysis.pdf>

<sup>8</sup> *Suit filed against Providence School District for failing to provide required special education services to hundreds of preschool children*. ACLU of Rhode Island. (2023, July 17). <https://www.riaclu.org/en/news/suit-filed-against-providence-school-district-failing-provide-required-special-education>

<sup>9</sup> *Early intervention data Dashboard: Executive Office of Health and Human Services*. Early Intervention Data Dashboard | RI EOHS (n.d.). <https://eohhs.ri.gov/consumer/families-children/early-intervention-program/early-intervention-data-dashboard>

<sup>10</sup> RI Children's Cabinet, Report and Recommendations on RI Pre-K Expansion (2022). (pp. 15-16). Retrieved from [https://kids.ri.gov/cabinet/documents/Report%20and%20Recommendations%20on%20RI%20Pre-K%20Expansion\\_12-30-22.pdf](https://kids.ri.gov/cabinet/documents/Report%20and%20Recommendations%20on%20RI%20Pre-K%20Expansion_12-30-22.pdf).

<sup>11</sup> Sources: (1) UCOA FY23 Detailed Program Expenditures (2) FY 2023 IDEA Preliminary Allocations (3) UCOA FY23 District Revenues (4) FY 2023 House Fiscal

<sup>12</sup> Rhode Island General Assembly. (n.d.). *Title 16: Education*. Education Equity and Property Tax Relief Act. <http://webserver.rilin.state.ri.us/Statutes/title16/16-7.2/16-7.2-6.htm>

<sup>13</sup> In 2023, the pool received \$14.8 mil in claims and was funded with \$15 mil, so districts received 100% of their claims. This is not always the case. *FY 2025 House-Fiscal-Budget Draft*

<sup>14</sup> Education Commission of the States. (n.d.). *Special Education Funding: 50-State Comparison*. K-12 Funding 2024. <https://reports.ecs.org/comparisons/k-12-funding-2024-04>

<sup>15</sup> *Part C extension option (for services beyond age 3)*. ECTA Center. (n.d.). [https://ectacenter.org/partc/partc\\_option.asp](https://ectacenter.org/partc/partc_option.asp)

<sup>16</sup> 34 CFR §303.734 Reservation for State Incentive Grants

<sup>17</sup> Education Commission of the States. (n.d.). *Special Education Funding: 50-State Comparison*. K-12 Funding 2024. <https://reports.ecs.org/comparisons/k-12-funding-2024-04>