MIDLAND ISD

SPECIAL EDUCATION
STAFF AND PROGRAM REVIEW

FINAL REPORT

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I. Executive Summary

Midland ISD serves a large, diverse student population reflective of the broader Permian Basin region. The district's enrollment includes a majority Hispanic student population, a significant proportion of students identified as economically disadvantaged, and a growing number of emergent bilingual learners. This demographic profile shapes instructional needs, staffing demands, and the complexity of delivering services across campuses. [1]

Special education enrollment represents a substantial segment of the district. According to the 2024–25 TAPR, Midland ISD continues to serve a high need population of students with disabilities whose academic performance trends highlight both areas of progress and persistent gaps.

The district's 2025 Special Education Determination Status of "Needs Assistance" further reflects the systemic challenges associated with serving a large, diverse, and mobile student population. These demographic realities combined with staffing shortages, high caseloads, and inconsistent implementation of MTSS and LRE practices create operational pressures that directly impact student outcomes and compliance. [2]

Despite these challenges, Midland ISD is entering an important period of organizational improvement. Current performance trends and internal program data highlight the need to strengthen student safety practices, refine placement processes, stabilize staffing, and build more coherent systems across campuses. This review serves as a strategic opportunity to examine the structures, expectations, and implementation patterns that shape special education services districtwide. The review identifies the systemic gaps that may limit long-term sustainability and outlines the high leverage opportunities that position Midland ISD to strengthen instructional quality, operational consistency, and outcomes for students.

[1] Demographic data inferred from Midland ISD district reports and Texas Education Agency (TEA) public enrollment statistics.
[2] Based on the Texas Education Agency Texas Academic Performance Report (TAPR) 2024–2025 for Midland ISD, which lists the district's Special Education Determination Status as "Needs Assistance."

Strengths

- **Clear commitment from district leadership** to address TEA findings and proactively redesign systems.
- **Dedicated staff** across campuses continue to support students despite workload pressures.
- **Existing program structures** (self-contained, inclusion/resource, early childhood) that can be strengthened through clearer expectations and monitoring.
- **Willingness to engage in a comprehensive, systems level review**, signaling readiness for long-term improvement.
- **Alignment with TEA expectations** is already underway through the district's focus on safety, LRE, and general supervision.

Opportunities

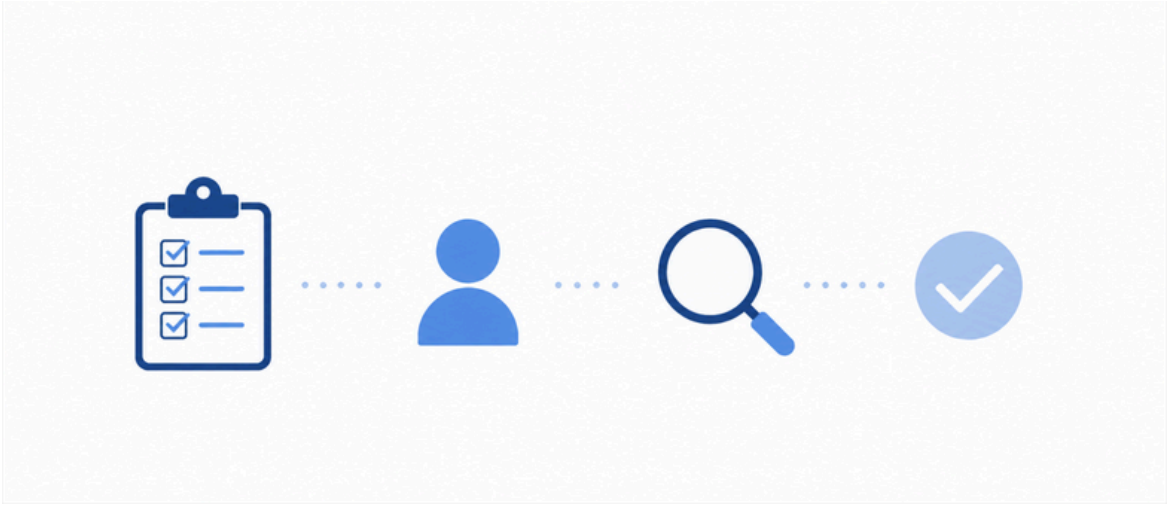
- **Strengthen student safety systems**, including camera workflows, restraint documentation, and crisis response protocols.
- Clarify **placement decision-making and LRE processes** to ensure equitable access to Tier 1 instruction and reduce unnecessary restrictive placements.
- **Improve self-contained program quality**, including classroom environments, schedules, IEP fidelity, and progress monitoring.
- **Right size staffing and caseloads** for teachers, paras, SLPs, LSSPs, and diagnosticians to align with recommended norms.
- **Build principal and AP capacity** in supervision, monitoring, and special education oversight.
- **Establish coherent professional development systems** tied to measurable improvements in instruction and compliance.
- **Develop governance structures** that ensure consistent implementation across campuses and reduce compliance risk.

II. Introduction

Midland Independent School District engaged Special Education Solutions, L.L.C. to conduct a comprehensive review of the district's special education programs, services, and supporting systems. This review was conducted over a multi-month period and examined the historical and current data that shape Midland ISD's instructional practices, operational structures, and compliance systems. The purpose of the review was to evaluate the extent to which the district's existing frameworks, resources, and implementation practices support high-quality instruction and positive outcomes for students with disabilities.

The review incorporated multiple data sources, including district provided data, staff engagements, an IEP file review, policy and procedure reviews, data reporting, and classroom observations across a range of instructional settings, as well as coordination with consultants providing services within the district. Special Education Solutions evaluated Midland ISD's strengths and areas for improvement across instructional, operational, and compliance domains, with particular attention to system level coherence, staffing patterns, placement practices, and the fidelity of IEP implementation.

This report summarizes the findings of the review and provides actionable recommendations for Midland ISD to consider as it works to strengthen special education services and ensure equitable access to high-quality instruction for all students with disabilities. The goal of this program review is to support the district to establish safe, sustainable systems, improve instructional access, and enhance outcomes for students through clear structures, aligned practices, and effective governance.



Overview and Purpose

III. Project Purpose

The purpose of this review is to evaluate the district's current structures, practices, and implementation to determine the extent to which they align with federal requirements, state expectations, and best practices for effective special education service delivery.
The project examines Midland ISD's special education operational and program effectiveness as well as special education safety and compliance. The review will provide a comprehensive evaluation of the district's current structures, practices, and implementation to determine how effectively they align with federal requirements, state expectations, and nationally recognized best practices for safe, and compliant special education service delivery. The review examines district systems through multiple lenses such as student safety protocols; staffing ratios and staff qualifications; service delivery models; caseload distribution; and compliance with Texas Education Code §§ 38.004 and 29.022, IDEA, and Section 504 as well as overall organizational capacity.

The review includes an in-depth analysis of policies, operational workflows, documentation, and data monitoring systems to assess coherence, consistency, and districtwide readiness to meet legal, instructional, and accountability standards. Specific areas of focus include child safety and abuse prevention, video surveillance in special education settings, restraint and seclusion practices, MTSS implementation, IEP fidelity, equity of access to the least restrictive environment, and certified staff support.

Findings from this review are designed to generate actionable, evidence-based recommendations that both address immediate compliance and safety concerns and guide the design of a three- to five-year strategic plan for system stabilization and improvement. The overarching purpose is to equip district leadership with a clear understanding of MISD's systemic strengths, gaps, and risks and to provide a practical, sustainable roadmap that strengthens student safety, enhances instructional quality, ensures compliance, and builds organizational capacity across all aspects of special education service delivery.

IV. Methodology & Approach

Special Education Solutions utilized a comprehensive, mixed methods approach to provide Midland ISD with a clear, objective understanding of the current state of its special education systems, staffing structures, instructional models, and compliance practices. The methodology integrates quantitative analysis, qualitative feedback, onsite observations, and systems level evaluation to ensure findings are evidence-based, actionable, and responsive to both immediate needs and long-term system improvement.

1. Document & Data Review

The review began with an extensive analysis of documents and datasets, including staffing lists, caseloads, service minutes, IEP samples, organizational charts, program descriptions, identification and LRE trends provided by the district. Publicly available data sources including the 2024–25 Texas Academic Performance Report (TAPR), PEIMS data, and demographic reports were also analyzed. This phase established a baseline understanding of Midland ISD's current structures, resource allocation, and compliance indicators and informed subsequent lines of inquiry.

2. Quantitative Staffing, Caseload, and Program Analysis

A detailed quantitative review was conducted to evaluate staffing patterns, caseload distribution, workload expectations, and service delivery configurations across the district. This included benchmarking staffing ratios against state norms, national recommendations, and peer districts; analyzing identification patterns and disability category distribution; and reviewing district growth trends and the relationship between staffing levels, instructional settings, and student needs.

3. Instructional, Compliance, and Service Delivery Review

The team conducted a structured review of IEPs and service delivery models to assess quality, alignment to student needs, and compliance with IDEA requirements. Onsite classroom and related service observations were conducted across multiple campuses to evaluate instructional practices, the fidelity of IEP implementation, and the alignment between written plans and actual service delivery. This component also included a focused review of student safety in self-contained settings, including camera usage, crisis response practices, restraint documentation, and the consistency of safety protocols across campuses.

4. Staff Engagement

To understand the lived experiences of staff across Midland ISD, Special Education Solutions conducted interviews and engagement sessions with campus administrators, diagnosticians, LSSPs, teachers, paraprofessionals, and related service providers. These conversations offered essential insight into how systems function daily, how communication flows across campuses, and where operational challenges most directly affect service delivery. Staff perspectives also highlighted areas of strength, pockets of effective practice, and the conditions that support or hinder implementation.

This qualitative information was critical in shaping the review's recommendations. It allowed Special Education Solutions to validate patterns observed in data and classroom visits, identify root causes behind inconsistent implementation, and ensure that recommendations were grounded in the realities of staff experience. The engagement process also helped distinguish between issues driven by system design versus those driven by capacity, training, or resource limitations. As a result, the recommendations reflect not only compliance expectations and best practices, but also the practical needs, barriers, and opportunities identified by the staff who work most closely with students.

5. Systems Analysis & Organizational Review

A systems level analysis evaluated governance structures, decision-making processes, workflow efficiency, and role clarity. The review examined compliance monitoring systems, data reporting practices, and organizational alignment to determine how effectively the district's structures support consistent implementation and long-term sustainability.
This analysis included a targeted review of how LRE decisions are made and documented, the consistency of placement practices across campuses, and the district's procedures for evaluating and supporting students with disabilities who are considered for DAEP placement, including alignment with federal protections and state requirements.

6. Synthesis, Recommendations, and Reporting

Findings from all data sources were synthesized into a coherent set of strengths, challenges, and recommendations. The methodology is designed to produce a practical, actionable roadmap that supports both immediate prioritized actions for improvement and system recommendations for sustainable improvement, ensuring Midland ISD can strengthen its special education services, student safety & security, improve instructional access, and build sustainable districtwide capacity.

V. District Context

Midland ISD is a large, diverse public school district located in Midland County, West Texas, serving a rapidly growing community shaped by regional economic expansion and significant student mobility. The district enrolls a substantial and varied student population, with many students identified as Hispanic, a high proportion of students classified as economically disadvantaged, and a sizable number of emergent bilingual learners. These demographic characteristics create a complex instructional landscape that requires strong systems, consistent practices, and well-aligned processes and supports across campuses. [3]

According to the 2024–2025 Texas Academic Performance Report (TAPR), Midland ISD earned a 2025 accountability rating of C and received a Special Education Determination Status of "Needs Assistance." STAAR performance data reflect persistent achievement gaps between students receiving special education services and the district overall, indicating systemic challenges in instructional access, intervention, and IEP implementation.

Midland ISD provides a continuum of services that includes inclusion/resource support, Early Childhood Special Education, and a range of self-contained instructional settings across multiple campuses. However, the district's size, demographic complexity, and rising special education enrollment create significant operational pressures. These include staffing shortages, uneven caseload distribution, variability in LRE decision-making, and inconsistencies in safety practices and IEP implementation across campuses.

Despite these challenges, Midland ISD benefits from committed educators, strong community investment, and a clear desire among district leaders to strengthen systems and improve outcomes for students with disabilities. These assets provide a solid foundation for the district to implement the high leverage recommendations identified through this program review and to build sustainable, aligned structures that support system improvements.

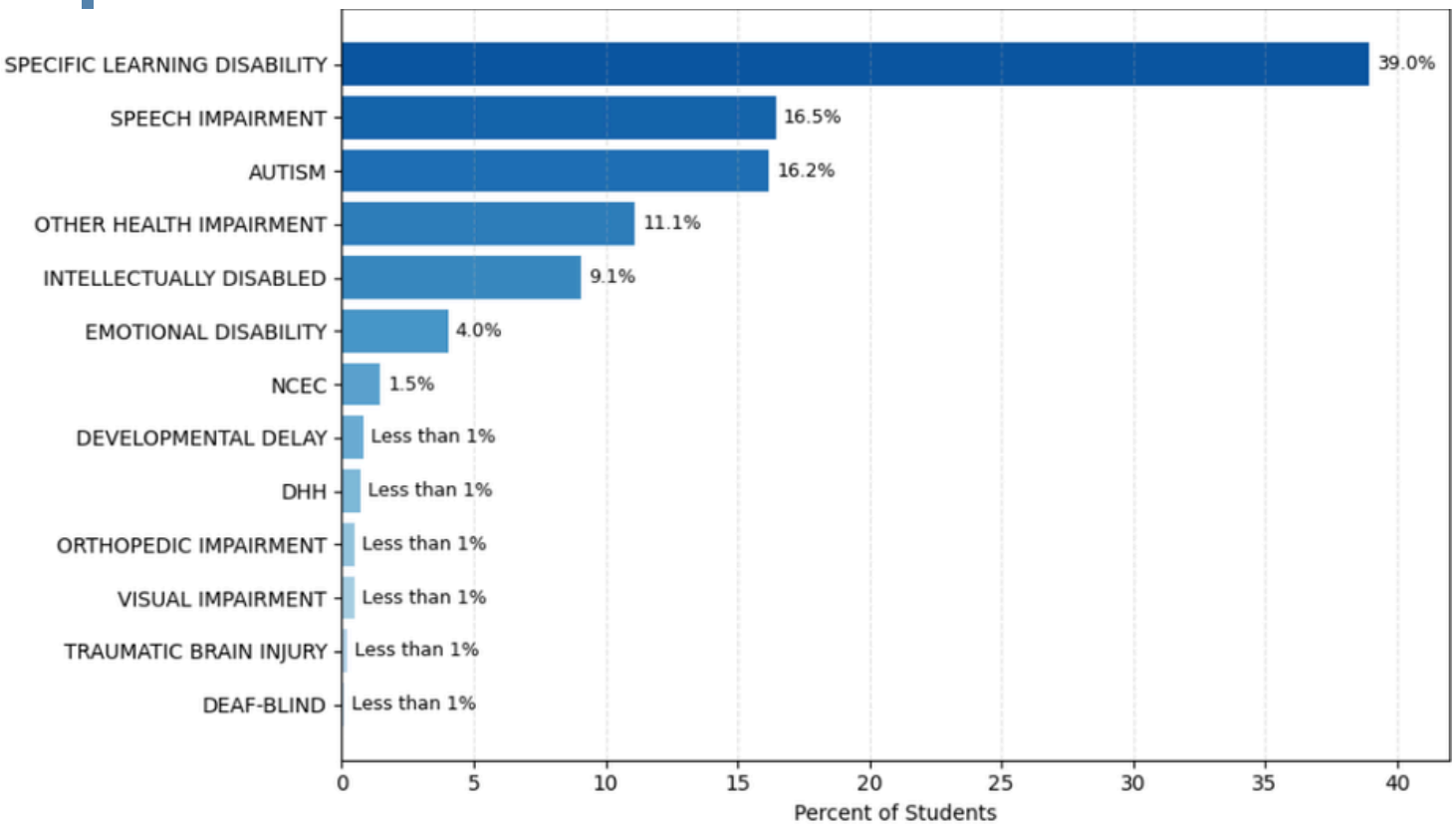
[3] Data and context drawn from the Texas Academic Performance Report (TAPR) 2024–2025 and Midland ISD Annual Performance Report, which detail districtwide demographic composition and enrollment trends.

Disability Condition Data and Its Role in Program Design, LRE, and Staffing

Understanding the distribution of disability conditions across the district provides essential context for designing effective special education programs and ensuring that students receive the supports required for successful IEP implementation. Patterns in disability categories directly influence the types of instructional models, related services, and staffing configurations a district must maintain. These data help leaders determine where specialized programs are needed, which campuses require targeted capacity-building, and how to structure service delivery to maximize access to high-quality instruction in the least restrictive environment (LRE).

Disability-condition trends also inform decisions about the intensity and expertise of staffing. Aligning staffing to disability patterns ensures that campuses are equipped with the right mix of certified teachers, paraprofessionals, and specialized personnel to implement IEPs with fidelity. When used strategically, disability-condition data provide a foundation for coherent program descriptions, clear entry and exit criteria, and consistent LRE decision-making for students with disabilities.

Table 1: ***Primary Disability Distribution***



Sourced from MISD shared caseload data April 2026

VI. Special Education Program Overview

Midland ISD's Special Education program operates within a large, diverse, and rapidly evolving regional context. Midland ISD 2024-2025 TAPR enrollment counts for total student population were 29,651 with a special education enrollment of 3,812 students. The district serves a high-need student population across numerous campuses, with rising special education enrollment, significant student mobility, and increasing demands on instructional and operational systems. A high functioning special education program in a district of Midland's size depends on several core components working in alignment to ensure safety, instructional quality, compliance, and equitable access for students with disabilities.

1. Clear Governance and Decision-Making Structures

Effective special education systems depend on clear roles, defined responsibilities, centralized processes, strong campus leadership, and access to specialized service providers. In Midland ISD, the district's large size and the wide range of student needs increase the number of people, campuses, and decisions involved. Without strong governance clarity, this scale makes it easier for practices to become inconsistent, harder to monitor implementation, and more difficult to ensure accountability across all campuses.

2. Safety and Security Procedures

Midland ISD's current practices related to program compliance, service delivery, and student safety indicate a clear need for more coherent systems, stronger monitoring structures, and consistent implementation across campuses. A review of IEPs demonstrates the importance of verifying implementation fidelity, ensuring that scheduled services match delivered services, and confirming that progress reporting, ARD documentation, and parent communication meet federal and state expectations. Adherence to evaluation timelines, procedural safeguards, and ARD/504 committee protocols also require strengthened oversight to reduce compliance risk and ensure equitable access to services.

Similarly, districtwide safety, restraint, and seclusion practices highlight the need for more consistent training, documentation, and monitoring. Analysis of incident reports must confirm compliance with state requirements for reporting and parent notification, while also assessing whether staff maintain current certification in approved crisis prevention and intervention programs. Trends in incident frequency, response quality, and reporting accuracy point to the need for clearer expectations, stronger campus level systems, and more reliable districtwide oversight.

3. Sustainable Staffing and Caseload Model

Midland ISD's staffing patterns must be aligned to student needs, required service minutes, and the complexity of instructional settings. Rising enrollment, high caseloads, and persistent vacancies place significant pressure on teachers, paraprofessionals, related service providers, and evaluation personnel. These conditions elevate the risk of compliance lapses, service delivery gaps, and staff burnout. Ongoing challenges in recruiting and retaining qualified staff combined with a high reliance on contracted services to maintain basic operations further underscore the need for a more stable, sustainable staffing model.

4. Strong MTSS, Referral, and Evaluation Systems

A coherent prereferral MTSS, intervention, and evaluation system is essential to ensuring that students receive appropriate support before a referral is initiated, and that eligibility decisions are based on complete, high-quality data. Variability in MTSS implementation and inconsistent documentation practices across campuses currently contribute to uneven referral quality and potential misalignment in identification patterns. Strengthening these systems will help ensure that interventions are delivered with fidelity, data are collected consistently, and evaluation decisions are both accurate and equitable.

5. Standards Aligned Instructional and Service Delivery Models

Instructional materials, interventions, and progress monitoring tools must be aligned to state standards and implemented consistently across campuses. In Midland ISD, variability in classroom environments, instructional routines, and IEP implementation particularly in self-contained settings indicates a need for clearer expectations and stronger monitoring systems. Ensuring the use of high-quality instructional materials, paired with well-developed, standards aligned IEPs, is essential for delivering coherent instruction and supporting student progress. Strengthening the design and delivery of specially designed instruction (SDI) will further ensure that students with disabilities receive targeted, individualized supports that enable meaningful access to the curriculum and measurable growth toward their goals.

6. Campus Leadership Capacity and Compliance Infrastructure

Principals and assistant principals play a critical role in scheduling, service alignment, ARD facilitation, and monitoring IEP implementation. Given Midland's size and staffing challenges, campus leaders require stronger training and clearer systems to ensure consistent oversight, compliance, and support for special education staff.

7. Data Systems and Operational Controls

High-performing districts maintain systems for monitoring caseloads, timelines, service delivery, safety protocols, and program quality. Midland ISD's current systems show gaps in consistency across these areas, as well as in documentation and real-time monitoring particularly in LRE decision-making, DAEP placement standards for students with disabilities, and safety practices in self-contained classrooms.

As a result, the district has limited visibility into compliance and service-delivery risk in real time, increasing the likelihood of missed timelines, inconsistent placement decisions, and preventable safety incidents for students with disabilities.

Overall Assessment

Midland ISD operates under significant operational and compliance pressures across its special education system. Rising student needs, high referral volume, staffing instability, and inconsistent implementation of safety, placement, and instructional systems have created conditions that require urgent stabilization and a consistent, stable structural redesign. The district's current accountability rating, special education determination status, and STAAR performance trends identify the need for coherent, districtwide systems that ensure safety, compliance, and equitable access to high-quality instruction.

A) Student Safety Systems Require Immediate Strengthening

Midland ISD must strengthen its compliance with Texas Education Code § 29.022, which governs the use of video surveillance in self-contained special education classrooms and other specialized instructional settings. While video equipment has been installed in many of these classrooms, current documentation and oversight indicate inconsistencies in process and implementation. The district lacks a standardized workflow for receiving, approving, and fulfilling camera requests, clear ownership of responsibility across departments, and documented procedures for storage, retention, and access to video and audio recordings.

Under TEC § 29.022(c), video cameras installed in special education classrooms are required to be capable of:

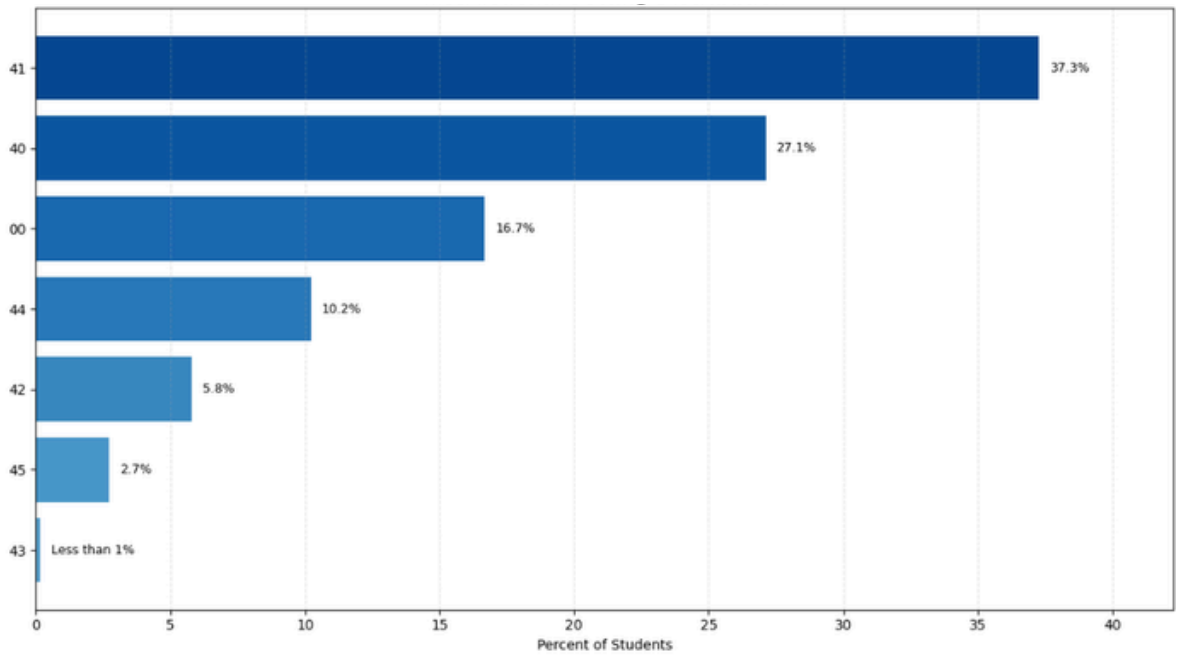
- Capturing all areas of the classroom or instructional setting including any attached room used for timeout or deescalation; and
- Recording audio from all such areas. An exception under Subsection (c-1) prohibits visual monitoring inside bathrooms or changing areas, except for minor incidental coverage due to classroom layout. However, audio recording in these spaces remains required by statute.

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B) Placement Decisions, LRE Practices, and Continuum of Services Need Coherence

Midland ISD's academic outcomes and graduation rates for students with disabilities indicate the need to examine whether current placement decisions are effectively supporting student success. 24-25 TAPR data show that students with disabilities graduate at lower rates than their peers and demonstrate lower levels of college, career, and military readiness. This pattern, combined with the district's "Needs Assistance" determination, suggests that the current continuum of services is not consistently enabling students to access rigorous instruction aligned to grade level standards. Variability in LRE decision making, unclear entry and exit criteria for specialized programs, and inconsistent access to high-quality Tier 1 instruction further contribute to uneven student progress and outcomes. Strengthening placement processes, ensuring alignment between instructional settings and student needs, and improving access to inclusive, standards aligned instruction will be essential to improving graduation outcomes for students with disabilities.

Table 2: ***Instructional Arrangement Percentages***



Sourced from MISD shared caseload data April 2026

The district currently lacks standardized placement protocols, program descriptions, and documentation practices. Student movement into and out of self-contained settings and specialized programs is not consistently tracked or analyzed, limiting the district's ability to evaluate whether placements are producing the expected outcomes. The district supports an inconsistent continuum of services and identified feeder patterns, particularly at junior high and secondary levels. Placement decisions are often ad hoc, and some students are placed off-home-campus without clear data showing the need for a more restrictive setting. The current system relies heavily on disability labels rather than needs-based placement and deescalation of support over time. Overcrowding is common in life skills classrooms with many well beyond recommended capacity.

DAEP placement processes for students with disabilities require review to ensure alignment with federal protections, manifestation determination review (MDR) procedures, and district policy.

C) IEP Fidelity and Self-contained Program Quality Are Inconsistent

Given the level of state attention on Midland ISD's special education practices, the district must strengthen its systems for monitoring IEP implementation, progress monitoring, and service delivery. Observations of self-contained classrooms show significant variability in instructional routines, daily schedules, environmental structure, and alignment to IEP goals.

Expectations for classroom setup, visual supports, safety procedures, and instructional practices are not consistently defined or monitored for effectiveness. This inconsistency indicates that the district lacks a unified system for tracking scheduled versus delivered services, increasing the risk of IEP implementation failures, and jeopardizing the provision of FAPE for students with disabilities.

D) Referral Volume and Evaluation Timelines Present Significant Compliance Risk

With more than 500 referrals this year including numerous evaluations with compromised timelines, the district faces urgent challenges in meeting IDEA evaluation requirements. Although the department has strengthened the process for evaluation tracking, which has reduced the number of missed deadlines, inconsistent documentation, limited visibility into workload distribution and lack of appropriately trained personnel will continue to escalate and cause continued compliance violations without immediate attention.

E) Staffing Shortages and Workload Pressures Are Not Sustainable

Midland ISD is experiencing critical shortages in diagnosticians, school psychologists, and specialized classroom staff. Multiple diagnostician resignations, the district's growing reliance on contracted staff such as school psychologists and speech pathologists have intensified workload pressures and contributed to delays in evaluations and ARD preparation. These challenges are compounded by staffing imbalances across campuses; for example, Behavior Support and other specialized classrooms operating with insufficient personnel, limiting the district's ability to provide safe, instructionally sound environments for students with intensive needs.

The district also lacks a clear and sustainable recruitment pathway for hard-to-fill positions, including special education teachers, educational diagnosticians, school psychologists, and speech-language pathologists. Without a defined strategy for attracting, developing, and retaining qualified staff, Midland ISD remains vulnerable to ongoing vacancies, high turnover, and inconsistent service delivery. Collectively, these conditions underscore the need for a districtwide staffing model grounded in student needs, required service minutes, and program complexity supported by a proactive recruitment and retention framework that stabilizes the workforce and strengthens compliance and instructional quality.

F) Staff Training

Midland ISD administrators and campus leaders require targeted training in MDR procedures, ARD facilitation, LRE decision making, DAEP placement requirements, and the legal frameworks governing special education. Currently, the district is experiencing an inconsistent understanding of evaluation protocols, eligibility criteria, and compliance expectations, resulting in uneven implementation and increased risk of IEP noncompliance.

These gaps extend beyond administrative processes and directly affect classroom practice. Teachers and paraprofessionals have not received consistent, districtwide training on how to support students with significant behavioral needs, including the use of proactive behavior supports, deescalation strategies, and implementation of Behavior Intervention Plans (BIPs).

Professional learning opportunities for the development of standards-based IEPs and appropriate goals aligned to grade level standards have not been consistently provided within the district over the past three to five years.

Similarly, campus administrators lack structured training in behavior systems, crisis response expectations, and monitoring behavior-related interventions. This limited capacity contributes to inconsistent responses to challenging behaviors, increased removals, and variability in the quality of support provided across campuses.

Collectively, these patterns highlight the need for a comprehensive professional learning system that builds administrator expertise in compliance and decision making while simultaneously equipping teachers and campus staff with the skills required to support students with complex behavioral and instructional needs.

G) Data Systems, Written Procedures, and Operational Controls Are Underdeveloped

The district lacks written special education procedures aligned to legal frameworks for key areas such as LRE determinations, placement in more restrictive settings, DAEP placements, IEP analysis, and safety protocols.

Communication pathways within the district are inconsistent, and staff report bypassing supervisory structures when making student decisions.

Conclusion

Midland ISD's special education system reflects a district under significant operational strain. Safety systems, placement practices, IEP fidelity, staffing, and compliance structures require immediate attention. Cultural and mindset change is required to prioritize student needs. At the same time, the district has meaningful strengths such as dedicated staff, a leadership team committed to improvement, and a willingness to directly confront systemic challenges.

By addressing structural gaps now, particularly in safety compliance, LRE decision-making, referral tracking, staffing, and governance. Midland ISD can stabilize operations, reduce compliance risk, and plan for a sustainable, high-functioning special education system that supports students, empower staff, and aligns with the district's long-term vision.

VII. Student Outcomes & Growth

Student performance data for Midland ISD indicate progress in expanding instructional access for students with disabilities; however, persistent achievement gaps remain and continue to impact the district's overall accountability status. The 2024–25 TAPR results indicate students receiving special education services consistently perform below their nonspecial education peers across STAAR content areas and grade levels. For example, in Grade 3 Reading, only 54% of students receiving special education services scored at Approaches Grade Level, compared to 74% districtwide. Similar gaps appear in mathematics, where 50% of Grade 3 students receiving special education services met the Approaches standard, compared to 68% districtwide.

These patterns persist across upper elementary and secondary grades. In Grade 7 Reading, 39% of students receiving special education services scored at Approaches, compared to 70% districtwide. In high school, English I EOC results show 28% of students receiving special education services at Approaches, compared to 59% districtwide. While performance varies by campus and student group, the overall trend indicates that students with disabilities are not yet accessing grade level content at rates comparable to their peers. Despite these gaps, the district demonstrates several positive indicators. The TEA Targeted Monitoring Report identifies strong systems for parent involvement and staff with strong knowledge and communication practices supporting special education implementation. Additionally, Midland ISD achieved 100% compliance in all seven priority areas reviewed during the targeted desk review, with all identified individual findings corrected prior to report issuance. These strengths provide a foundation for improving instructional quality and student outcomes.

The district's ongoing challenge is to translate compliant systems and strong procedural practices into improved academic performance for students with disabilities. The persistent achievement gaps reflected in STAAR and EOC data underscore the need for strengthened instructional models, more consistent implementation of IEP-aligned supports, and deeper alignment between general and special education instructional practices.

Table 3: ***STAAR Math Grade 3-5***

STAAR Math Grade 3-5 Special Education

Grade	Level	MISD	MISD SPED	Region 18	State
3	Approaches	68%	50%	66%	71%
3	Meets	42%	30%	38%	46%
3	Masters	18%	11%	15%	19%
4	Approaches	73%	48%	65%	69%
4	Meets	50%	29%	40%	47%
4	Masters	26%	10%	18%	24%
5	Approaches	72%	47%	66%	74%
5	Meets	45%	24%	38%	47%
5	Masters	21%	8%	15%	22%

Source: Texas Academic Performance Reports (TAPR), Spring 2025

Table 4: ***STAAR ELA Grade 3-5***

STAAR Reading Grade 3-5 Special Education

Grade	Level	MISD	MISD SPED	Region 18	State
3	Approaches	74%	54%	73%	77%
3	Meets	46%	25%	43%	52%
3	Masters	19%	8%	15%	23%
4	Approaches	80%	53%	76%	81%
4	Meets	50%	24%	44%	54%
4	Masters	19%	5%	15%	24%
5	Approaches	72%	45%	70%	77%
5	Meets	51%	24%	47%	58%
5	Masters	23%	7%	19%	29%

Source: Texas Academic Performance Reports (TAPR), Spring 2025

Table 5: ***STAAR Math Grade 6-8***

STAAR Math Grade 6-8 Special Education

Grade	Level	MISD	MISD SPED	Region 18	State
6	Approaches	79%	60%	69%	74%
6	Meets	45%	26%	33%	40%
6	Masters	19%	7%	11%	16%
7	Approaches	37%	29%	41%	55%
7	Meets	16%	15%	19%	33%
7	Masters	3%	4%	4%	11%
8	Approaches	60%	35%	64%	71%
8	Meets	37%	19%	38%	47%
8	Masters	14%	6%	11%	18%

Source: Texas Academic Performance Reports (TAPR), Spring 2025

Table 6: ***STAAR ELA Grade 6-8***

STAAR Reading Grade 6-8 Special Education

Grade	Level	MISD	MISD SPED	Region 18	State
6	Approaches	77%	54%	73%	77%
6	Meets	54%	25%	47%	56%
6	Masters	25%	9%	19%	29%
7	Approaches	70%	39%	69%	76%
7	Meets	45%	21%	43%	54%
7	Masters	21%	4%	18%	27%
8	Approaches	73%	42%	75%	82%
8	Meets	48%	18%	47%	58%
8	Masters	23%	1%	21%	32%

Source: Texas Academic Performance Reports (TAPR), Spring 2025

Table 7: ***STAAR EOC***

STAAR EOC Special Education

Subject	Level	MISD	MISD SPED	Region 10	State
English I	Approaches	68%	28%	70%	69%
English I	Meets	50%	11%	52%	49%
English I	Masters	15%	4%	17%	15%
English II	Approaches	72%	36%	73%	72%
English II	Meets	54%	20%	56%	55%
English II	Masters	7%	6%	10%	8%
Algebra I	Approaches	92%	33%	79%	78%
Algebra I	Meets	64%	12%	47%	45%
Algebra I	Masters	33%	4%	30%	27%

Source: Texas Academic Performance Reports (TAPR), Spring 2025

Determination Level

Midland ISD continues to hold a Determination Level 2: Needs Assistance, as assigned by TEA for the 2022–2023, 2023–2024, and 2024–2025 school years. This determination reflects a combination of student performance outcomes, Results Driven Accountability (RDA) indicators, and federally required elements (FREs). While the district met 100% compliance with the targeted monitoring review, the continued DL2 designation indicates that student outcomes particularly for students with disabilities remain below state expectations.

The district also received a Significant Disproportionality (SD) Year 3 designation in 2022–2023 and again in 2024–2025, further contributing to the DL2 status and signaling the need for sustained attention to equity in identification, placement, and discipline patterns for students with disabilities.

While Midland ISD's current Determination Level reflects a district that is generally meeting procedural requirements and demonstrating movement toward improvement, the rating also shows fragility in that balance. The district's operational systems, particularly those tied to staffing stability, MTSS implementation, LRE decision making, and monitoring of disproportionality are not yet strong or consistent enough to ensure sustained compliance or improved student outcomes. Without coherent structures and predictable campus level practices, the district remains at risk of tipping from "Needs Assistance" into "Needs Intervention," especially as academic performance, discipline patterns, and equity indicators continue to carry significant weight in the federal determination process.

Strengths

1. Strong Compliance and Foundational Systems

Midland ISD demonstrated 100% compliance across all seven priority areas reviewed in the targeted desk review, with all individual student-level findings corrected prior to report issuance.[4]

2. Staff Knowledge and Communication Practices

While supervisors possess foundational knowledge of special education practices, continued development is required to effectively carry out general supervision responsibilities, ensure implementation fidelity and reduce compliance risk districtwide.

Opportunities

1. Persistent Achievement Gaps for Students with Disabilities

Despite strong compliance, Midland ISD continues to experience significant performance gaps between students receiving special education services and general education peers across all tested subjects and grade levels.

Examples from TAPR:

- Grade 3 Reading: 54% SPED Approaches vs. 74% districtwide.
- Grade 7 Reading: 39% SPED Approaches vs. 70% districtwide.
- English I EOC: 28% SPED Approaches vs. 59% districtwide.
- These gaps indicate that compliant systems have not yet translated into

2. Need for alignment between IEPs and Tier 1 Instruction

The district's performance patterns suggest that students with disabilities may not be consistently accessing grade level content with the level of scaffolding, specially designed instruction, and progress monitoring required to close gaps. This is particularly evident in reading and mathematics, where Meets and Masters performance for students with disabilities remains low.

3. Continued Monitoring of Equity Indicators (SD Year 3)

Midland ISD received a Significant Disproportionality (SD) Year 3 designation in both 2022–2023 and 2024–2025, as documented in the TEA Targeted Monitoring Report, which identifies the district's status as "SD Year 3 (2022–2023 and 2024–2025)." Signaling concern in identification, placement, or discipline patterns for students with disabilities

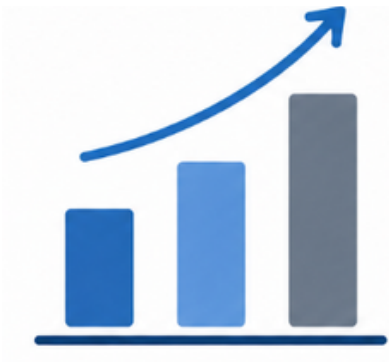
[4] Findings summarized from the Texas Education Agency 2025 Targeted Monitoring Report for Midland ISD, documenting full compliance across all reviewed priority areas.

4. **Instructional Consistency Across Campuses**
   While Midland ISD has established several procedural systems, student outcome data reveal significant variability across campuses particularly in secondary reading, mathematics, and EOC performance. These patterns indicate a need for more consistent implementation of instructional frameworks, intervention systems, and progress monitoring practices districtwide.

   In specialized programs, the district has adopted the Unique Learning System (ULS) curriculum for self-contained classrooms; however, there is no clear guidance or expectations for fully implementing the program in life skills settings. Classroom observations show inconsistent instructional routines, limited use of standards aligned materials, and a lack of structured learning environments. Additionally, specialized classrooms do not have defined expectations for classroom organization, delivery of services, or support structures, resulting in uneven instructional quality and limited access to meaningful learning opportunities for students with significant needs.

   The absence of clear instructional expectations combined with inconsistent use of curriculum resources and limited monitoring of classroom practice has contributed to noticeable gaps in instruction across many specialized settings. Strengthening districtwide guidance, establishing nonnegotiable classroom structures and ensuring consistent implementation of curriculum and instructional practices will be essential to improving outcomes for students with disabilities.

5. **Strengthening Access to Grade Level Standards**
   The low percentage of students with disabilities performing at Meets and Masters indicates that many students are not yet accessing rigorous, standards aligned instruction. This needs to align with TEA's recommended technical assistance resources on standards-based IEP development and instructional alignment.



6. Special Education Leadership Team

The Special Education Leadership Team demonstrates limited capacity in both knowledge and implementation of special education requirements, largely due to the absence of clearly defined operational processes and procedures at the departmental level. Although team members possess a basic understanding of IDEA and Texas Administrative Code (TAC) requirements, their ability to implement and sustain a comprehensive, districtwide special education program is constrained by several systemic factors.

These include insufficient administrator knowledge of special education requirements, limited campus administrator capacity to effectively supervise special education programming, and a lack of clear accountability structures to ensure campuses consistently implement and support special education services.

The absence of coherent systems, written procedures, and standardized workflows has resulted in inconsistent practices across campuses and among staff. There are widespread misunderstandings related to core compliance and instruction impacting functions, including IEP implementation, documentation requirements, compensatory services, disciplinary procedures for students with disabilities, IEP development, and progress monitoring. As a result, practices vary significantly by campus, increasing compliance risk and limiting the district's ability to ensure consistent, high-quality implementation of special education services districtwide.

Midland ISD has established some procedural foundations, yet the district's next phase of improvement requires operational consistency and alignment across all components of the special education service delivery system. To meaningfully improve student outcomes, the district must ensure that curriculum and instruction, Admission, Review, and Dismissal (ARD) decision making practices, IEP development, IEP implementation, and Least Restrictive Environment (LRE) determinations operate as a unified, coherent system rather than as isolated processes. Strengthening these operational connections and ensuring they are implemented consistently across campuses will be essential for building a predictable, standards aligned instructional experience for students with disabilities. By setting clear expectations, aligning practices, and maintaining ongoing monitoring, Midland ISD can shift from procedural compliance to improving instruction and student outcomes for those with disabilities.

VIII. Student Discipline

Overview

Discipline patterns across Midland ISD reflect significant systemic concerns, including disproportionality, overreliance on exclusionary practices, and insufficient behavioral support structures. These trends align with TEA's monitoring priorities related to safety, crisis response, restraint documentation, and prohibitions on aversive techniques. The district's SD status further impacts the urgency of strengthening behavior systems and ensuring legally compliant practices.

OSS and DAEP data show disproportionately high rates of exclusion for students with disabilities, particularly at secondary campuses. These outcomes point to foundational gaps in districtwide behavior support, supervision systems, and campus-level capacity. Teachers have not received consistent training in de-escalation, proactive behavior supports, or implementation of Behavior Intervention Plans, resulting in uneven responses to challenging behaviors. Likewise, administrators lack clear expectations and structured guidance for managing behavioral incidents, monitoring interventions, and supporting specialized programs. [5]

The absence of defined behavioral frameworks, classroom structures, and program guidelines across specialized settings contributes to inconsistent practice and increased removals. Collectively, these patterns highlight an urgent need for a comprehensive redesign of the district's behavior support systems.

OSS and DAEP Patterns for Students with Disabilities

Out-of-School Suspension (OSS)

Across the district in the 25-26 SY, 383 OSS incidents involved students receiving special education services. The following data identifies some of the campuses contributing to the high rates of OSS placements.

Secondary campuses account for most OSS placements, including:

Abell JH (41 OSS incidents)
Midland Freshman (13 OSS)
Legacy High (26 OSS)
Midland High (21 OSS)
Midland Alternative Program (29 OSS)

Sourced from MISD discipline dataset April 2026

[5] Analysis based on district-provided discipline data for Midland ISD, April 2026, detailing OSS and DAEP placements disaggregated by disability status and campus level.

Several elementary campuses also show elevated OSS placements for students with disabilities (e.g., Fannin 14, Henderson 9, Emerson 17), indicating early behavioral escalation without adequate Tier 1/Tier 2 supports.

High OSS rates for students with disabilities point to deeper systemic gaps that extend beyond individual student behavior. They signal that the district's current behavior and instructional infrastructure is not providing the level of prevention, support, and consistency needed to keep students safe and successfully engaged in school. Elevated removals often reflect inconsistent implementation of behavior intervention practices, limited access to high-quality FBAs and Behavior Intervention Plans, and uneven staff capacity to deescalate and respond to challenging behaviors. They also highlight weaknesses in campus supervision systems and the need for more coherent, inclusive instructional practices that reduce the likelihood of escalation. Together, these patterns suggest that the district must strengthen its behavior support framework, build staff skill and confidence, and ensure that campuses have the systems, training, and tools required to maintain safe and supportive environments for students with disabilities.

DAEP Placements for Students with Disabilities

Districtwide DAEP placement patterns for students with disabilities indicate significant systemic challenges in behavior support, early intervention, and campus-level implementation. During the review period, the district recorded 147 DAEP placements for students receiving special education services, a volume that reflects both the intensity of student needs and gaps in the district's current behavior infrastructure. Secondary campuses account for the majority of DAEP placements, with particularly high numbers at Legacy High, Legacy Freshman, Midland High, Midland Freshman, and several junior high campuses. Although elementary placements are fewer, their presence signals early escalation and missed opportunities for preventative intervention. These patterns indicate that campuses lack consistent behavior support, specialized staffing, and Tier 1 and Tier 2 systems necessary to prevent removals and maintain students in their least restrictive environment. [6]

In addition, there is a lack of understanding across campuses regarding mandatory versus discretionary DAEP placements for students with disabilities. The high number of DAEP referrals initiated by special education teachers suggests limited understanding of legal requirements, insufficient training on Behavior Intervention Plans (BIPs), and a lack of effective classroom level behavioral strategies.

[6] Summary of district-level DAEP placement data provided by Midland ISD in April 2026, reviewed as part of internal discipline trend analysis for students receiving special education services.

As a result, students with disabilities are being removed at disproportionate rates, with many exceeding allowable out-of-placement days or FAPE free days while continuing to receive disciplinary consequences for behaviors linked to unmet needs.

These challenges are compounded by ongoing staff injuries related to aggressive student behavior, often occurring in classrooms without adequate behavior plans, crisis response systems, or structured supports. Collectively, these findings point to an urgent need for a districtwide redesign of behavior systems, clearer guidance on disciplinary decision making, and comprehensive training for teachers and administrators to ensure safe, legally compliant, and instructionally supportive environments for students with significant behavioral needs.

High-volume secondary campuses:
Legacy High: 17
Midland High: 13
Legacy Freshman: 17
Midland Freshman: 12
Abell JH: 12
Goddard JH: 12
San Jacinto JH: 13

Sourced from MISD discipline dataset April 2026

Elementary DAEP placements, though fewer, indicate early escalation and lack of early intervention (e.g., Jones ES, Emerson ES, Scharbauer ES).

Systemic Root Causes

Synthesizing the discipline data with the Safety review reveals several systemic contributors:

Midland ISD's current approach to behavior support and disciplinary placements reveals significant structural gaps that directly affect the district's ability to provide FAPE and an appropriate service delivery. The elementary DAEP program is not staffed with special education teachers, resulting in situations where students with disabilities either lose access to required services or must rely on campus teachers traveling to DAEP, an arrangement that is unsustainable and reduces support available on home campuses. As a temporary measure, the district reassigned two specialists to the elementary DAEP to cover IEP implementation, but this solution further exposes campus-level capacity strain and the urgent need for a permanent staffing model.

These challenges occur within a broader context of an insufficient behavior support infrastructure across the district. Professional development participation in critical areas of behavioral support, crisis prevention, CBI, and inclusion has been inconsistent, leaving campuses without the foundational skills needed to support students with significant behavioral needs. Current OSS and DAEP patterns confirm widespread gaps, including limited access to behavior specialists, the absence of campus-based crisis response teams, inconsistent CPI training cycles, and minimal coaching for teachers on implementing behavior supports.

The inconsistent implementation of FBAs and BIPs further contributes to high exclusion rates. Data indicate that BIPs are frequently not implemented with fidelity, not updated based on student data, or not aligned with instructional and environmental needs. These systemic weaknesses collectively increase the likelihood of removals, elevate safety risks, and compromise the district's ability to meet legal requirements for students with disabilities.

Campus Supervision and Monitoring Systems as well as discipline data point to possible outcomes of:

- Inconsistent administrator oversight and lack of an appropriate system for tracking behavioral interventions, IEP implementation, accommodations
- Lack of monitoring for BIP fidelity
- Limited use of data tracking to identify disproportionality
- Lack of an appropriate behavioral data tracking system

Overreliance on Exclusionary Practices

The high number of DAEP occurrences (675 total occurrences districtwide which includes all students not only students with disabilities) indicates a systemic pattern of exclusion rather than intervention.

Given Midland ISD's SD status and TEA's monitoring expectations, the district must implement a multi-tiered, districtwide behavior support redesign. Midland ISD should restructure behavior intervention and embed training for staff.

IX. Safety and Security

TEA increased its focus on Midland ISD after an incident drew significant media attention and raised concerns about the district's ability to ensure student safety. The combination of public scrutiny, staff resignations, and formal allegations prompted closer state review. As a result, the safety and security domain was prioritized due to recent complaints, student safety allegations, and TEA's heightened monitoring expectations. This section evaluates Midland ISD's current safety systems, statutory compliance, and operational practices across child protection, video surveillance, crisis response, restraint documentation, and staff capacity.

The analysis reviewed the internal systems aligned with Texas Education Code (TEC) §§38.004 and 29.022, IDEA, Section 504, and related federal and state special education mandates and to assess whether internal systems meet TEA's directives. The district has taken initiative to install cameras in most if not all of the special education self-contained classrooms throughout the district. However, it appears that the installation only partially meets requirements under Except as provided by Subsection (c-1) below, Tex. Educ. Code 29.022(c) requires that video cameras placed in the special education classroom or other sped setting must be capable of:

Covering all areas of the special education classroom or other special education setting, including a room attached to the classroom or setting used for time-out; and recording audio from all areas of the special education classroom or other special education setting, including a room attached to the classroom or setting used for time-out.

Subsection (c-1) creates an exception for the inside of a bathroom or any area in the special education classroom or other special education setting in which a student's clothes are changed. These areas may not be visually monitored, except for incidental coverage of a minor portion of a bathroom or changing area because of the layout of the classroom or setting. However, audio recording of the inside of a bathroom or any area of the classroom or other special education setting in which a student's clothes are changed is required
The district should review the installation of all camera equipment to ensure all areas are covered, including the required audio portions of the TEC code.

Additionally, the district is working to produce written procedures for cameras. Currently, video footage is viewed by staff members when requested rather than following a standard procedure for viewing. The district should develop a procedure with appropriate viewing requirements, requests, and documentation for access to view and review any video footage.

Crisis Response, Restraint, and Seclusion Practices

The review included an examination of restraint and seclusion logs, parental notification timelines, staff training records (including CPI), and documentation of incident investigations. The district's review plan requires reviewing restraint and seclusion incidents from 2022 to the present and verifying that parental notification and documentation meet state requirements.

Self-contained and high needs settings are inherently high-risk environments, and TEA expects districts to maintain strong crisis prevention systems, ensure staff are trained in deescalation, and document all incidents accurately and consistently.

Preliminary system-level findings indicate several areas of concern across the district:

- Restraint documentation is inconsistent across campuses.
- Parental notification timelines related to restraint incidents are not consistently met or adequately documented.
- CPI training cycles do not sufficiently align with staff turnover or varying campus needs.
- Incident investigations lack standardized protocols, documentation expectations, and quality assurance measures.

In addition, the district does not currently have a formal, districtwide system for documenting seclusion or timeout practices. Although several campuses utilize calming or de-escalation rooms, consistent logs, written procedures, and documentation expectations have not been established. The absence of standardized processes increases compliance risk and limits the district's ability to effectively monitor student safety, ensure appropriate use of these practices, and verify that parent notification requirements are met.

Strengthening training, documentation and oversight in these areas is an immediate and critical need to ensure student safety and maintain legal and regulatory compliance.

Safety Protocols in Self-contained Settings

Preliminary system-level findings identified multiple areas requiring the district to engage in protocol development in the following areas:

- Supervision patterns vary across campuses, however special education supervisors are required to attend special education classrooms daily.
- Physical classroom environments lack consistent safety features and environmental safeguards.
- Staff report unclear expectations related to crisis recognition, escalation, and response procedures.
- Program descriptions, operational protocols, and safety expectations are not standardized across campuses.
- Training and professional development related to behavioral intervention and crisis response are insufficient. Staff report limited guidance on responding to escalating behaviors, and behavior interventionists demonstrate varying levels of knowledge regarding evidence-based intervention strategies.

Staffing, Training, and Capacity

The review reviewed staffing ratios, turnover, PD participation, and capacity to meet safety and compliance expectations. The district's review plan includes evaluating staff trained in restraint procedures (CPI or equivalent) and assessing professional development participation, especially in behavioral support.

Safety is directly tied to staffing stability, training cycles, and role clarity. High turnover or insufficient training compromises crisis response and increases compliance risk.

Preliminary System-Level Findings

- Staffing shortages impact supervision and crisis response.
- Training cycles do not keep pace with turnover.
- Behavioral support for PD is inconsistent across campuses.
- Role clarity for paraprofessionals varies widely.

Corrective Actions Taken by the District

The district has actively taken actions to immediately support safety and security including:

- Installed cameras and media equipment in special education self-contained classrooms across the district.
- Retraining on TEC 38.004.
- Review of recruitment and retention incentives.
- Contracting a behavioral consultant to directly focus on strengthening the behavior support system within the district.

Summary

The Safety and Security review identified systemic gaps in staff training, documentation practices, and crisis-response procedures to which the district is currently addressing. While these issues exist, they are being addressed through coordinated action, strengthened monitoring systems, and clear leadership expectations. By prioritizing these improvements, Midland ISD will enhance the safety of both students and staff. The district has already begun implementing corrective steps and remains committed to building safe, compliant, and trustworthy special education environments.

X. Synthesis of External Consultant Review & Special Education Solutions

In Fall 2025, Midland ISD engaged another consultant to conduct targeted observations of specialized programs across multiple campuses, including Behavior Support Classrooms (BSC), Life Skills, LEAP, ASC, and DAEP. The external consultants findings align closely with the broader districtwide analysis conducted by Special Education Solutions, confirming consistent systemic patterns across settings, campuses, and service delivery models. Together, these reviews provide a coherent and evidence-based picture of Midland ISD's current special education landscape.

Instructional Quality and Engagement Are Inconsistent Across Specialized Settings
Both reviews identified significant variability in instructional engagement, particularly in self-contained and behavior-focused classrooms. The external consultant documented frequent periods of student idleness, over-reliance on tablets, minimal direct instruction, and long-term substitutes leading instruction in high-needs settings. Special Education Solutions similarly found inconsistent implementation of curriculum, limited alignment to IEP goals, and uneven access to standards-aligned instruction.
Aligned conclusion: Midland ISD lacks a districtwide framework for instructional expectations in specialized programs, resulting in inconsistent instructional quality and potential FAPE risks.

Staffing Shortages and Caseload Pressures Are Systemic and High-risk

Both analyses highlight critical staffing shortages, including uncertified teachers in BSC classrooms, unfilled paraprofessional positions, oversized Life Skills classes, and heavy reliance on paraprofessionals to deliver instruction. The external consultant concluded that classrooms were operating with insufficient staff, while Special Education Solutions documented districtwide shortages in diagnosticians, LSSPs, SLPs, and specialized program teachers.

Aligned conclusion: Staffing instability is directly impacting safety, instructional quality, evaluation timelines, and the district's ability to meet IDEA requirements. [7]

Behavior Systems Are Underdeveloped and Inconsistently Implemented

Across campuses, both reviews found weak or inconsistent behavior systems, including:

- Limited staff skill in deescalation
- Inconsistent implementation of BIPs
- Outdated or missing FBAs
- Lack of individualized behavior monitoring
- High needs students overwhelming staff
- Safety incidents linked to inadequate behavior supports

Special Education Solutions' analysis of OSS/DAEP data further confirms that behavior systems are insufficient, contributing to high exclusion rates for students with disabilities.

Aligned conclusion: Midland ISD needs a districtwide behavior support continuum, crisis response infrastructure, and consistent training for teachers and administrators.

Classroom Structure, Schedules, and Routines Are Not Consistently in Place

External consultant documented an observed widespread absence of:

- Posted student schedules
- Staff schedules
- Rotation plans
- Structured routines
- Organized classroom environment

[7] Findings derived from External Consultant Staffing Analysis for Midland ISD (2025) and Special Education Solutions Staffing Review (2025) documenting personnel shortages across specialized programs and related services.

Special Education Solutions identified the same gaps across multiple campuses, noting that structured environments are non-negotiable for BSC and Life Skills settings.
Aligned conclusion: The district lacks a unified set of non-negotiables for self-contained classrooms, resulting in inconsistent environments and reduced instructional access.

Student Safety and Supervision Require Immediate Attention

The most serious finding from the external consultant's review was related to supervision in the BSC classroom, mirroring broader concerns identified by Special Education Solutions regarding crisis response, restraint documentation, staff training cycles, and supervision protocols.
Immediate solution: Midland ISD is currently developing consistent structures within BSC classrooms across the district by establishing standards and engaging in consistent implementation practices.[8]

Program Model Drift and Feeder Pattern Inefficiencies

Both reviews noted that program placement patterns (e.g., BSC at Abell, LEAP at Jones) may not align with student needs or staffing capacity.The external consultant identified potential over centralization and PEIMS coding errors, while Special Education Solutions found broader inconsistencies in LRE decision-making and program design.
Aligned conclusion: Midland ISD needs a districtwide review of its specialized program continuum, feeder patterns, and placement criteria as well as review of PEIMS coding practices.

Bright Spots Provide Models for Replication

Both reviews identified Parker Elementary as a model site for DAEP and ASC programming, demonstrating:

- Strong leadership
- Clear systems
- High engagement
- Effective inclusion practices

Aligned conclusion: The district has internal exemplars that can serve as anchors for systemwide redesign.

Together, these reviews provide a unified, evidence-based foundation for Midland ISD's 3–5-year Special Education Strategic Plan and confirm the urgency of systemwide redesign to ensure safety, compliance, and equitable access for students with disabilities.

[8] Findings drawn from the External Consultant Review of BSC Programs (2025) and Special Education Solutions Safety and Supervision Analysis (2026).

XI. Staffing & Organizational Structure Review

Midland ISD operates within one of the most challenging labor markets in Texas. The region's strong oil and gas economy places sustained upward pressure on wages, creates unpredictable workforce mobility, and reduces the supply of certified educators. Research consistently shows that these dynamics directly affect the district's ability to recruit and retain highly qualified teachers.

According to the Learning Policy Institute (2026), West Texas districts, including Midland ISD, experience some of the state's lowest teacher certification rates and highest turnover levels due to competition from higher-paying energy-sector jobs.

The District's 2026–27 projections show persistent vacancies, continued reliance on associate teachers, and caseloads exceeding staffing recommendations. These patterns also present an opportunity for Midland to leverage certification pathways to support the development and advancement of associate teachers within the existing workforce.

Midland ISD's current special education staffing structure reflects a large, highly distributed instructional support workforce with significant variability in role deployment, program coverage, and vacancy rates. The dataset provided by the district includes approximately 500 instructional support positions across elementary, junior high, and high school campuses, with the majority assigned to Life Skills, Resource/Inclusion, Autism, LEAP, BSC, and districtwide support roles. While the district maintains a substantial number of paraprofessionals to support specialized programs, the distribution and vacancy patterns indicate several operational challenges that directly affect service delivery, instructional quality, and IEP implementation. [9]

1. Overall Staffing Structure

The district employs a multi-tiered support model consisting of:

- Central office leadership and clerical staff.
- Districtwide instructional support staff (TAs assigned to Life Skills, Resource/Inclusion, Visual Impairment, Autism, and specialized programs) including teacher apprentices.
- Campus based instructional support staff across elementary, junior high, and high school campuses.
- Program specific paraprofessionals supporting Life Skills, LEAP, BAC, Autism, and Resource/Inclusion.

[9] Data sourced from Midland ISD's 2025–2026 internal staffing dataset provided for special education program analysis, summarizing instructional support roles, vacancies, and campus assignments.

This structure provides broad coverage across programs; however, the volume of paraprofessional positions relative to certified staff suggests a heavy reliance on instructional support personnel to maintain daily operations.

2. High Concentration of Staff in Life Skills Programs

Life Skills staffing represents the largest proportion of positions across the district, with nearly every elementary and secondary campus hosting multiple paraprofessionals. This pattern reflects:

- A high number of students served in self-contained settings.
- Significant adult-to-student support needs.
- A program architecture that may be more restrictive than necessary.

The concentration of staffing in Life Skills aligns with the Texas Education Agency's identification of Least Restrictive Environment (LRE) as a priority area for Midland ISD. The significant number of Life Skills positions indicates that the district may need to evaluate whether current placements accurately reflect student needs, whether some students could be appropriately served in less restrictive settings with the right supports, and whether existing staffing patterns are reinforcing restrictive placements rather than promoting flexible service delivery.

3. Resource/Inclusion Staffing Is Broad but Inconsistent

Resource/Inclusion paraprofessionals are present across nearly all campuses; however, the number of positions varies widely. Some campuses have multiple staff assigned, while others have only one or rely on districtwide support. This inconsistency may contribute to uneven implementation of inclusion supports, variability in co-teaching and push-in models, and challenges in providing consistent access to the general education curriculum. Given Midland ISD's student performance patterns, strengthening the Resource/Inclusion model represents a key opportunity to improve outcomes.

4. Significant Vacancy Rates Across Programs

Vacancies appear across multiple program areas, including Life Skills at the elementary and junior high levels, Resource/Inclusion programs at both levels, and specialized programs such as Autism and Behavior Support Classrooms (BSC). These gaps indicate staffing challenges that span a range of student support services across the district.

Districtwide vacancies in specialized program TA positions create immediate risks for IEP implementation fidelity, student safety and supervision, and compliance with required service minutes. These gaps also increase staff burnout as campuses rely on constant coverage to maintain basic operations. The volume and persistence of vacancies indicate a broader need for strengthened recruitment, retention, and compensation strategies, particularly for high needs programs where staffing stability is essential for safe and consistent service delivery.

Midland ISD demonstrates a heavy reliance on paraprofessionals to deliver specialized instruction across programs such as Autism, Behavior Support Classrooms (BSC), LEAP, and Visual Impairment. While paraprofessionals play an essential role in supporting students, current staffing patterns indicate that certified special education teachers are stretched thin, resulting in paraprofessionals frequently providing instructional support that exceeds their formal training and intended role. This reliance increases variability in program quality, particularly in settings with high turnover or limited access to certified staff.

The district does not employ districtwide teaching assistants, and paraprofessionals and specialists are frequently reassigned with little or no advance notice to address staffing gaps across campuses. While many specialists and support personnel are placed on teacher contracts to provide the district with greater flexibility in reassignment, this practice reduces staffing stability, disrupts continuity of services, and limits the development of sustained expertise within specialized instructional programs.

These staffing patterns underscore the need for a more sustainable and intentional staffing model. Key areas for improvement include increasing the number of appropriately certified special education teachers in specialized settings, clearly defining and standardizing the roles and expectations of paraprofessionals, and strengthening training, supervision, and support systems.

The current staffing structure presents the following risks and impacts:

- **Instructional Risk:**
  Frequent staff reassignments disrupt instructional continuity and limit the ability to implement specialized programming with fidelity. Students, particularly those with complex behavioral or instructional needs, may experience inconsistent support and reduced access to evidence-based practices.

- **Staffing Burnout and Retention Risk:**
  Lack of role clarity, frequent schedule changes, and shifting responsibilities contribute to staff stress and burnout. These conditions increase the risk of turnover among paraprofessionals and specialists, further destabilizing programs, and increasing recruitment and training demands.

- **Program Quality and Capacity Risk:**
  The absence of stable staffing limits the district's ability to build and sustain expertise within specialized programs. Overreliance on reassignment rather than strategic staffing weakens program development, supervision, and long-term capacity.

- **Compliance and Legal Exposure:**
  Inconsistent staffing and supervision practices increase the risk of noncompliance with special education requirements related to service delivery, implementation of IEPs, and provision of appropriate support. These conditions elevate the district's exposure to corrective action, monitoring findings, or parent complaints.

- **Systems and Oversight Risk:**
  Without standardized staffing models and supervision structures, district leadership has limited ability to monitor implementation, ensure accountability, and proactively address gaps in service delivery across campuses.

These findings can be supported through centralized collaboration among the Special Services Department, Human Resources, and Finance, using an annual review process to inform and sustain a strategic staffing plan.

Evidence of Shortages

Review of district staffing data indicates clear evidence of shortages in Resource Teacher and all special education certified teacher positions across elementary, junior high, and high school campuses. The district's own staffing projections explicitly identify unmet needs and reliance on non-certified personnel to address gaps. Three consistent patterns emerged from the analysis:

1. Documented Staffing Gaps

Multiple campuses have a demonstrated need for additional Resource Teachers based on staff to student ratios. The needs are the result of high student-to-staff ratios or open positions that have not been filled this year. Examples include:

- Alamo
- Lone Star
- South
- Abell
- San Jacinto
- Emerson

A review of current staffing ratios across the district reveals the need for the addition of several special education teachers to appropriately implement student IEPs. Additionally, vacancies that have gone unfilled on campuses which may have resulted in reduced services for students. This could result in students not receiving documented services, requiring additional ARD meetings to discuss compensatory services. Recruiting and hiring for these open positions has been a challenge due to the lack of applicants who are qualified.

2. Reliance on Associate Teachers (ATs) in Place of Certified Teachers

Several campuses list configurations such as "2T 1AT," "1T 1AT," or "1 Teacher, 2 AT, 1 Vacant." This pattern reflects two critical issues:

- A qualification gap, as Associate Teachers (ATs) are not certified special education teachers.
- A capacity gap, as ATs cannot independently manage individualized education programs (IEPs) or provide specialized instruction consistent with special education requirements.

The reliance on ATs may suggests certified staff are insufficient to meet instructional and compliance demands.

3. Caseload Mismatches

Caseload data further indicates disproportionate staffing relative to student needs. Several campuses serve large special education populations with limited resource teachers, including:

- Greathouse – 151 students, (2 teachers /75:1), (4 TAs /1:38)
- Franks – 128 students, (2 teachers/ 1:64), (4 TAs /1:32)
- Yarbrough – 161 students, (2 teachers / 1:81), (5 TAs/ 1:32)
- Bowie – 102 students, (2 teachers / 1:51), (1 TA / 1:102)
- Burnet – 92 students, 2 teachers /1:46), (4 TAs / 1:23)

These ratios suggest that current staffing levels may not adequately support individualized instruction, progress monitoring, and IEP implementation within a workload analysis model.[10]

Resource Teacher Staffing Analysis

Districtwide Conclusion: Resource Teachers

Based on documented vacancies and caseload analysis, Midland ISD faces an estimated districtwide shortage of approximately 12 special education teaching positions and 16 elementary TA positions.

This estimate reflects three primary factors:

1. Documented campus notations when comparing current staff to student ratios compared to recommended ratios.
2. The need to replace Associate Teachers (ATs) currently serving in lieu of certified special education teachers.
3. Caseload imbalances across high-enrollment campuses, where student volumes significantly exceed recommended staffing ratios.

Collectively, these data indicate that current Resource Teacher capacity is insufficient to support required individualized instruction, compliance with IEP implementation, and equitable service delivery across campuses.

[10] Analysis based on district-provided staffing ratio data (April 2026) used for workload modeling and special education service delivery review.

Paraprofessional Staffing Analysis

A. Evidence of Shortages

Several campuses with 60–90 special education students report having only one or no paraprofessionals assigned. This level of support is inadequate to meet the combined demands of inclusion assistance, behavioral support, resource room instruction, and student safety and supervision.

B. Districtwide Conclusion: Paraprofessionals

The district is estimated to have a shortage of approximately 16 paraprofessionals. This estimate reflects:

- Explicit campus-level requests for additional support staff.
- Caseload and supervision demand associated with high-volume campuses.
- The need for consistent paraprofessional coverage to ensure safety, inclusion fidelity, and instructional support.

Appendix C provides a detailed workload analysis for teacher and paraprofessional roles to support data-driven decision-making in these areas.

Dyslexia Teacher Staffing Analysis

A. Evidence of Shortages

Dyslexia service delivery across Midland ISD signal a structural misalignment between student needs, campus-level caseloads, and the district's current staffing assignment model. Although dyslexia teachers are centrally deployed rather than campus-based, this configuration results in multiple campuses appearing to have no assigned dyslexia teacher despite serving students who require daily intervention. This absence of campus-level attribution does not necessarily indicate a staffing shortage; however, it does signal a lack of transparency in workload distribution and makes it difficult to verify whether staffing levels meet instructional and statutory expectations. When teachers are assigned centrally, it becomes challenging to determine whether these ratios are being met, whether itinerant staff are stretched across too many campuses, or whether service delivery is inconsistent.

Strengthening the staffing model either through campus-based assignments or transparent workload tracking will be essential for validating compliance and ensuring equitable access to dyslexia services across all campuses.

Dyslexia Teacher Staffing & Workload Analysis

Overview

This section analyzes the district's dyslexia intervention staffing model, including teacher allocation, campus coverage, and deployment structure. Midland ISD employs 26 certified dyslexia teachers, 25 of whom are centrally assigned under an itinerant service delivery model, with 1 campus-based teacher assigned to Lone Star Trails Elementary. The district's total annual investment in dyslexia teaching staff is approximately $1,981,221.

Dyslexia Teacher Staffing Allocation by Campus Level

Table 8: ***Dyslexia Workload Analysis***

Campus Level	Campuses Served	Dyslexia Teachers Available (Districtwide Pool)	Estimated Coverage Ratio (Teachers per Campus)	Staffing Model	Coverage Status
Elementary Schools	21 campuses	26 (shared pool)	1.24: 1	Itinerant	**Marginal**
Elementary is where the vast majority of dyslexia identification and Tier III structured literacy intervention occurs. Even with all 26 teachers primarily serving elementary, 1.24 per campus is thin for schools that may have 15–40+ identified dyslexia students each.					
Junior High Schools	4 campuses	26 (shared pool)	Coverage drawn from same pool	Itinerant	**Marginal**
Secondary dyslexia services are legally mandated to continue; itinerant teachers must split time across elementary AND secondary campuses.					
High Schools	5 campuses	26 (shared pool)	Coverage drawn from same pool	Itinerant	**At Risk**
High schools typically receive the least dyslexia teacher time in an itinerant model, risking compliance gaps for continued service obligations under TEC §38.003.					

Specialty Campuses	4 campuses (Carver Center, Pease, Bowie, Midland Alternative)	26 (shared pool)	Coverage drawn from same pool	Itinerant	**At Risk**
These campuses often have concentrated populations of struggling readers but may be deprioritized in itinerant scheduling.					
District Total	**34 campuses**	**26 teachers**	**0.76 teachers per campus**	**Centralized Itinerant**	**Needs Improvement**

Summary of Critical Observations

- **Staffing Model:** 96% of dyslexia teachers (25 of 26) are centrally assigned under an itinerant deployment model. Only 1 teacher is campus-based (Lone Star Trails Elementary).
- **Coverage Ratio:** At 0.76 dyslexia teachers per campus districtwide, the ratio falls below the recommended minimum of 1.0 teacher per campus for districts with significant dyslexia identification rates.
- **No Paraprofessional Support:** Unlike SLP and diagnostician teams, the dyslexia program employs zero instructional aides or paraprofessionals to support certified teachers — all 26 staff are certified SPED Teachers.
- **Salary Investment:** The district invests $1,981,221 annually in dyslexia teaching staff, with an average teacher salary of $76,201 — reflecting a predominantly mid-to-senior-career workforce (92% earn above $70,000).
- **Secondary Coverage Gap:** With 9 secondary campuses (4 JH + 5 HS) drawing from the same 26-teacher pool as 21 elementary campuses, structured literacy intervention time at the secondary level is likely insufficient to meet Texas Dyslexia Handbook requirements.

Implications for Midland ISD

Current staffing patterns across special education including teachers, paraprofessionals, and dyslexia personnel indicate significant systemic challenges that carry both instructional quality and compliance implications. Without addressing documented shortages, the district is at elevated risk. Across every staff category examined in this review, workload data reveal that a majority of providers are operating at elevated or critical capacity, with caseloads that exceed recognized professional benchmarks

It is important to acknowledge the fiscal and labor-market realities that constrain the district. Midland ISD, like many West Texas districts, operates within a competitive and geographically challenging recruitment environment. This level of planning will require time for the district to build strong protocols for progress monitoring, recruitment, and strategic, innovative staffing practices, supported through coordinated collaboration among district staff.

A deliberate, phased strategic staffing plan will build district capacity incrementally while stabilizing the existing workforce. Such a plan must recognize that not every identified need can be addressed simultaneously. Positions will necessarily be prioritized based on compliance urgency, student impact, and operational feasibility. Highest-risk gaps must be addressed in the near term, while broader capacity-building efforts are sequenced across subsequent budget cycles.

A well-designed strategic staffing plan can position Midland ISD to compete in a uniquely challenging labor market. By combining market responsive compensation, pipeline development, professional learning, and multi-year sustainability structures, the district can work toward stabilization of its workforce and ensure operational compliance, safety, and high-quality services for students with disabilities.

Evaluation Staff

Midland ISD's evaluation system is experiencing significant strain driven by high diagnostician caseloads, elevated referral activity, bilingual assessment demand, and uneven workload distribution across campuses. The district diagnosticians are responsible for managing initial referrals, reevaluations, ARD participation, parent communication, and MTSS consultation across a large, diverse, and highly mobile student population. Current caseload levels exceed recommended workload thresholds established by the Council for Exceptional Children (CEC) and the National Association of School Psychologists (NASP), which suggest a sustainable evaluator workload of 60–80 active cases.

Midland's diagnostician caseloads range from 60 to 236 students, with multiple campuses exceeding 120 and several surpassing 150. These levels represent critical overload conditions that increase compliance risk, delay timelines, and reduce the district's ability to conduct high-quality, comprehensive evaluations.

Diagnostician Caseload Analysis

A. Current Caseload Conditions

A review of Midland ISD's diagnostician staffing data indicates a systemwide workload imbalance, with several campuses carrying extreme caseloads above recommended thresholds. Typical guidelines from the Council for Exceptional Children (CEC) and Texas Association of School Psychologists (TASP) suggest ideal evaluative caseloads of 50–75 students per full-time diagnostician, depending on referral complexity. In contrast, Midland ISD diagnosticians are managing two to three times this number.

Representative examples from the district's caseload file include:

- *Legacy High School – 236 students (1 FTE)*
- *Midland High School – 203 students (1 FTE)*
- *Barbara Yarbrough Elementary – 163 students (2 FTE)*
- *Fannin Elementary – 165 students (1FTE)*
- *Greathouse Elementary – 144 students (2FTE)*

Even at the lower end of the range, outliers such as MAP (35 students) and PreK MC (14 students) reflect anomalies rather than evidence of balanced distribution. Overall, diagnosticians across the district are regularly managing 100–165 students each, far exceeding recommended norms and diminishing the district's capacity for timely evaluations, compliance with state timelines, and consistent oversight of individualized education programs (IEPs). [11]

[11] District Student Caseload Roster, Midland ISD, 2026.

The district is experiencing an unusually high number of educational diagnostician vacancies due to mid-year resignations and positions that have remained unfilled throughout the year. This has required current diagnosticians to assume additional caseloads, contributing to staff burnout and placing the district at increased risk of noncompliance with state-mandated evaluation timelines. Other consequences, beyond burnout and missed timelines, when staff absorb caseloads from vacant positions include:

- Reduced evaluation quality and defensibility
- Increased backlog and workflow bottlenecks
- Weaker parent communication and trust
- Higher risk of procedural errors
- Inconsistent practices across campuses
- Compensatory service liability and corrective actions
- Staff turnover accelerates – overload leads to resignations, sick leave use, and recruiting/training costs

B. Initial Referral Volume and MTSS Impact

The district also faces increasing initial referral activity, further straining diagnostician capacity. Campuses such as Barbara Fasken Elementary (43 initial referrals) and Greathouse Elementary (45 initial referrals) report unusually high referral counts. Additional campuses, including Bonham, Franks, Milam, Ralph Bunche, and South Elementary, show 20–32 referrals each—an indication of possible inconsistencies within the Multi-Tiered Systems of Support (MTSS) process and potential over-identification t trends.[12]

High referral volumes without strong MTSS fidelity directly increase the number of eligibility evaluations required, elevating workload pressure and extending evaluation timelines. A more structured MTSS process, including intervention documentation and fidelity checks, would help stabilize evaluation demand and reduce overreliance on testing as the primary gateway to services.

[12] District Referral Data, Midland ISD, 2026.

C. Bilingual Evaluation Demand

Midland ISD serves a substantial bilingual population, and the demand for bilingual evaluations adds additional workload complexity to diagnostician assignments. Several campuses report diagnosticians carrying 10–12 bilingual evaluations each—for example, Barbara Fasken Elementary (12), Burnet Elementary (12), Milam Elementary (12), and Ralph Bunche Elementary (11). These evaluations require extended assessment protocols, additional language proficiency data, culturally responsive interpretation, and longer report timelines. As a result, caseload intensity, not just size, is a critical factor when assessing the district's staffing sufficiency.[13]

D. Strategic Opportunities: Virtual Case Management and Oversight

Given the current imbalance between workload and capacity, Midland ISD could benefit from implementing a structured virtual case management and evaluation oversight system. This model successfully employed in several Texas districts and documented by the Region 13 Education Service Center (ESC, 2025) and the National Center for Special Education in Charter Schools (NCSECS, 2024) uses certified consultants or diagnosticians working remotely to manage compliance monitoring, paperwork backlog reduction, and triage of initial referrals.

Such systems, when aligned with TEA and FERPA compliance protocols, allow districts to redistribute workload, standardize evaluation quality, and maintain continuity of support even during staffing shortages. Based on the campus position control report, Midland ISD appears to have approximately 12–14 diagnosticians, depending on shared campuses.

[13] District Referral Data, Midland ISD, 2026.

Educational Diagnostician Workload Analysis

Campus-by-Campus Caseload Review, Referral Pipeline Impact, and Staffing

This section presents a campus-level and diagnostician-level analysis of educational diagnostician workloads across Midland ISD. Educational diagnosticians are responsible for conducting Full Individual Evaluations (FIEs), reevaluations on a three-year cycle, ARD meeting participation, compliance documentation, and teacher/parent consultation. Unlike related service providers who carry a defined service caseload, diagnostician workload is driven by two simultaneous demands: (1) ongoing management of their total assigned special education population and (2) active completion of new referral evaluations, each of which requires 20–30+ hours of assessment, report writing, and ARD coordination.

To capture this dual burden, this analysis introduces an Adjusted Workload Score that weights pending referrals at 2× the value of ongoing caseload students. This formula Adjusted Workload = Total Caseload + (Pending Referrals × 2) reflects the reality that each initial referral generates substantially more per-student work than routine caseload maintenance. Bilingual assessment needs are reported separately as a complexity modifier, since bilingual evaluations require interpreter coordination, dual-language test administration, and culturally responsive interpretation adding approximately 40% more time per evaluation. Data reflects the most recent snapshot provided by the district (as of March 2).

Workload Band Legend

Caseload Status

Status	SPED Caseload	Interpretation
Green — Manageable	≤ 80	Caseload allows adequate time for reevaluations (≈27/year on 3-year cycle), initial referrals, and ARD compliance within standard work hours.
Yellow — Elevated	81 – 125	Caseload exceeds manageable threshold. Reevaluation timelines, referral completion within 45 school days, and ARD scheduling are at risk.
Red — Critical	≥ 126	Caseload is unsustainable. Compliance deadlines, evaluation quality, and FIE completion timelines are at serious risk. Immediate intervention required.

Referral Intensity

Intensity	Pending Referrals	Impact
Low	≤ 15	Referral volume manageable within standard workload.
Moderate	16 – 30	Referral volume strains capacity; may require overtime or deadline extensions.
High	≥ 31	Referral volume exceeds capacity; 45-school-day timeline compliance at risk.

Adjusted Workload Status

Status	Adjusted Score	Formula
Green — Manageable	≤ 110	Caseload + (Referrals × 2)
Yellow — Elevated	111 – 175	
Red — Critical	≥ 176	

Campus-by-Campus Diagnostician Workload

Table 9.1: ***Diagnostician Caseload by Campus — As of March 2***

Campus	Level	SPED Caseload	Pending Referrals	Bilingual	Staff Model	Adjusted Workload	Caseload Status
Elementary Campuses							
Barbara Fasken Elementary	Elementary	133	43	12	1 Diag + 1 AF	**219**	**Red**
Barbara Yarbrough Elementary	Elementary	163	24	2	1 Diag + 1 AF	**211**	**Red**
Bonham Elementary	Elementary	109	27	4	1 Diag	163	Yellow
Burnet Elementary	Elementary	95	19	12	1 Diag	133	Yellow
Bush Elementary	Elementary	111	30	0	1 Diag	171	Yellow
De Zavala Elementary	Elementary	68	17	3	1 Diag	102	Green
Emerson Elementary	Elementary	122	14	1	1 Diag	150	Yellow
Fannin Elementary	Elementary	165	19	3	1 Diag + 1 AF	**203**	**Red**

Campus	Level	SPED Caseload	Pending Referrals	Bilingual	Staff Model	Adjusted Workload	Caseload Status
Elementary Campuses							
Franks Elementary	Elementary	128	27	3	1 Diag	**182**	**Red**
Greathouse Elementary	Elementary	144	45	3	1 Diag + 1 AF	**234**	**Red**
Henderson Elementary	Elementary	131	13	5	1 Diag	157	**Red**
Jones Elementary	Elementary	97	14	4	1 Diag	125	Yellow
Lone Star Trails Elementary	Elementary	126	16	3	1 Diag	158	**Red**
Long Elementary	Elementary	109	11	6	1 Diag + 1 AF	131	Yellow
Milam Elementary	Elementary	67	32	12	1 Diag	131	Green
Parker Elementary	Elementary	120	25	1	1 Diag	170	Yellow
Ralph Bunche Elementary	Elementary	80	26	11	1 Diag	132	Green
Rusk Elementary	Elementary	85	12	7	1 Diag	109	Yellow
Santa Rita Elementary	Elementary	118	18	7	1 Diag	154	Yellow
Scharbauer Elementary	Elementary	109	28	3	1 Diag	165	Yellow
South Elementary	Elementary	80	8	3	1 Diag	96	Green
Junior High Campuses							
Abell Jr High	Junior High	137	12	2	1 Diag	161	**Red**
Alamo Jr High	Junior High	108	2	1	1 Diag	112	Yellow
Goddard Jr High	Junior High	119	2	0	1 Diag	123	Yellow
San Jacinto Jr High	Junior High	115	5	1	Secondary Coverage ⚠	125	Yellow
High School Campuses							
Legacy Freshman High School	High School	60	2	0	1 Diag	64	Green
Legacy High School	High School	219	0	0	1 Diag	**219**	**Red**
Midland Freshman High School	High School	89	5	2	1 Diag	99	Yellow
Midland High School	High School	203	0	2	1 Diag	**203**	**Red**
Specialty Campuses							
Bowie	Specialty	105	32	1	1 Diag	169	Yellow
Carver Center	Specialty	41	14	0	1 Diag	69	Green
Culver	Specialty	1	0	0	1 Diag (shared)	1	Green

ECHS	Specialty	1	0	0	1 Diag (shared)	1	Green
Encore	Specialty	24	0	0	1 Diag (shared)	24	Green
MAP	Specialty	35	0	0	1 Diag (shared)	35	Green
Pease	Specialty	73	5	2	1 Diag	83	Green
Pre-K Academy at Midland College	Specialty	14	18	1	2 Diag	50	Green
Viola M Coleman High School	Specialty	12	1	0	1 Diag (shared)	14	Green
YWLA	Specialty	18	5	0	Secondary Coverage ⚠	28	Green
DISTRICTWIDE TOTALS	**—**	**3,734**	**571**	**117**	**39 campuses**	**—**	**—**

⚠ **Notification: No Dedicated Diagnostician on Campus**

Two campuses — **San Jacinto Jr High** (115 SPED students, 5 referrals) and **YWLA** (18 SPED students, 5 referrals) — are staffed through "Secondary Coverage" arrangements with no dedicated diagnostician assigned. This coverage model risks compliance gaps during peak referral periods, particularly for initial evaluation timelines (45 school days under 34 CFR §300.301). Another issue is that multiple diagnosticians are responsible for three to four campuses at once, which results in total caseloads much higher than those on any single campus.

Additionally, two diagnosticians are each carrying cross-campus evaluation duties at Jones Elementary (noted as "16 at Jones" and "22 at Jones" in district records), suggesting that Jones serves as an overflow evaluation site. This practice, while creative, masks the true referral burden and may complicate compliance tracking across campuses.

A Diagnostician Aggregate Workload

Table 9.2: ***Diagnostician Aggregate Workload — Total Caseload Across All Assigned Campuses***

Midland ISD diagnosticians work at multiple campuses, so campus data does not show their actual workload. Table 9.2 presents the aggregate caseload and referral volume each diagnostician carries across all assigned campuses the true measure of workload sustainability.

Diagnostician	Campuses Served	Total Caseload	Total Referrals	Bilingual	Adjusted Workload	Adjusted Status
Diag 1	3 campuses (+ AF support at 1)	361	84	8	**529**	**Red**
Diag 7	2 campuses (+ AF at 1)	189	37	17	**263**	**Red**
Diag 2	2 campuses	243	0	0	**243**	**Red**

Diagnostician	Campuses Served	Total Caseload	Total Referrals	Bilingual	Adjusted Workload	Adjusted Status
Diag 12	1 campus (+ AF support)	144	45	3	**234**	**Red**
Diag 3	4 campuses	210	8	3	**226**	**Red**
Diag 8	1 campus (+ AF support)	133	43	12	**219**	**Red**
Diag 4	1 campus (+ AF support)	163	24	2	**211**	**Red**
Diag 5	1 campus (+ AF support)	165	19	3	**203**	**Red**
Diag 6	1 campus	203	0	2	**203**	**Red**
Diag 10	3 campuses	173	12	2	**197**	**Red**
Diag 9	1 campus	128	27	3	**182**	**Red**
Diag 18	1 campus	111	30	0	171	Yellow
Diag 24	1 campus	105	32	1	169	Yellow
Diag 20	1 campus	109	28	3	165	Yellow
Diag 16	1 campus	109	27	4	163	Yellow
Diag 14	1 campus	126	16	3	158	Yellow
Diag 11	1 campus	131	13	5	157	Yellow
Diag 21	1 campus	118	18	7	154	Yellow
Diag 28	2 campuses	133	10	1	153	Yellow
Secondary Coverage	2 campuses	133	10	1	153	Yellow ⚠
Diag 19	2 campuses	114	19	2	152	Yellow
Diag 13	1 campus	122	14	1	150	Yellow
Diag 17	1 campus	95	19	12	133	Yellow
Diag 27	1 campus	67	32	12	131	Yellow
Diag 15	1 campus	119	2	0	123	Yellow
Diag 22	1 campus	85	12	7	109	Green
Diag 25	1 campus	68	17	3	102	Green
Diag 23	1 campus	80	8	3	96	Green
Diag 26	1 campus	60	2	0	64	Green
Pre-K Team	1 campus (2 Diag)	14	18	1	50	Green
TOTALS	**30 providers**	**3,734**	**571**	**117**	**avg 167**	**Red**

Districtwide Workload Summary

Key Metrics at a Glance

- Total SPED Students Managed: 3,734.
- Total Active Campuses: 39.
- Total Diagnostician Providers: 30 (28 dedicated + 2 secondary coverage).

- Total Pending Initial Referrals: 571.
- Total Bilingual Assessments Needed: 117 (20% of referrals).
- Itinerant Assessment Facilitators: 1 serving 3 campuses.

Campus-Level Caseload View

- Green (≤ 80) - 14 of 39 (36%).
- Yellow (81–125) - 15 of 39 (38%).
- Red (≥ 126) - 10 of 39 (26%).

Diagnostician-Level Adjusted Workload (True Burden)

- Green (≤ 110) - 5 of 30 (17%).
- Yellow (111–175) - 14 of 30 (47%).
- Red (≥ 176) - 11 of 30 (37%).

Campus Bilingual Referrals - % of Total Referrals

- Burnet Elementary - 12/63%.
- Ralph Bunche Elementary - 11/42%.
- Milam Elementary - 12/38%.
- Fasken Elementary - 12/28%.

The diagnostician workload picture is significantly more stressed than the campus-level caseload numbers suggest. When measured by Adjusted Workload, which accounts for the intensive evaluation labor generated by each pending referral 84% of diagnosticians are operating at Elevated or Critical levels. Eleven diagnosticians carry adjusted workloads exceeding 176, with the most burdened provider managing 361 students and 84 active referrals across three campuses (Adjusted Workload: 529). The district's 571 pending initial referrals represent 11,400–17,100 hours of evaluation work the equivalent of 6–9 full-time diagnostician positions dedicated solely to new evaluations. The 117 bilingual assessments add substantial complexity, with four campuses requiring bilingual evaluation capacity for more than 25% of their referrals. Two campuses lack a dedicated diagnostician entirely, relying on secondary coverage arrangements that create compliance vulnerability.

Note: Caseload and referral data reflects Midland ISD's internal diagnostician tracking records as of March 2. Staff names have been omitted. Diagnosticians are identified by generic designators.

Speech-Language Pathology (SLP) Program Analysis

Overview

An review of Midland ISD's Speech-Language Pathology (SLP) services reveals systemwide workload imbalance, inconsistent supervision structures, and compliance vulnerabilities aligned with findings from the American Speech-Language-Hearing Association (ASHA) and Texas Education Agency (TEA) service delivery guidance. Current caseloads frequently exceed evidence-based workload standards, and several campuses rely primarily or exclusively on Speech-Language Pathology Assistants (SLPAs) without strained supervision capacity. Additionally, high bilingual service demands and dependence on contracted SLPs contribute to variable quality and reduced program stability.

Key Findings

1. Caseloads at multiple campuses far exceed ASHA's recommended thresholds of 55–60 students per SLP or up to 110 students for a combined SLP/SLPA team. Examples include Barbara Yarbrough Elementary (106 students, both SLPAs), Fannin Elementary (103 students, two SLPs), and Greathouse Elementary (74 students, one contract SLP and one Life Skills SLP). These ratios are unsustainable and elevate risk of noncompliance with IDEA's mandate for timely services.

2. Supported Bilingual Service Delivery Bilingual speech-language needs are extensive particularly at South Elementary, Barbara Fasken, Milam, Ralph Bunche, and De Zavala. Midland ISD employs few bilingual SLPs. As a result, bilingual caseloads are concentrated with SLPAs.

3. In Caseload Ratios and Lack of Governance review data show extreme caseload ratios (e.g., teams managing 140–160 students), indicating the absence of a districtwide workload management framework. These ratios fail to account for non-direct service duties such as evaluations, ARD participation, progress reporting, and documentation core components of ASHA's workload model.

4. Dependence on Contracted SLPs

   The district's reliance on contracted SLPs (e.g., Greathouse, Henderson, Jane Long) introduces cost inefficiencies and service discontinuity. Contracted personnel often have limited availability for ARD participation, reduced integration into MTSS and campus structures, and inconsistent supervision capacity for SLPAs, further weakening the stability of the program.

Implications

Midland ISD's current caseload distribution, supervision structure, and staffing composition pose a significant strain under both ASHA and TEA standards. Overreliance on SLPAs, insufficient bilingual capacity, and the absence of a governance model for workload management increase the likelihood of:

- Delayed eligibility evaluations and ARD actions
- Reduced therapy fidelity and student progress
- Elevated compensatory service liability
- Staff burnout and turnover among certified SLPs

Recommendations

Enhance compliance, improve service quality, and stabilize workload conditions, Midland ISD should implement the following strategic actions:

E. Districtwide Summary

Speech-Language Pathology Workload Analysis

Campus-by-Campus Caseload Review, Provider Team Workload, and Staffing

This section presents a comprehensive analysis of speech-language pathology workloads across Midland ISD, benchmarked against the American Speech-Language-Hearing Association's (ASHA) workload analysis framework and Texas Association of School Boards (TASB) staffing guidance. ASHA's 2024 Schools Survey reported a national median caseload of 50 students per SLP. Texas reported a median of 65. This analysis uses a threshold of 50 students per provider as the manageable benchmark.

Critically, Midland ISD's staffing model relies heavily on shared SLP/SLPA teams serving multiple campuses, supplemented by virtual, contract, and agency providers. This analysis therefore presents two complementary views: (1) campus-level caseload, which shows student volume at each site, and (2) provider team workload, which reveals the actual caseload carried by each SLP/SLPA team across all their assigned campuses. The provider-level view is the accurate measure of workload sustainability.

Workload Band Definitions

Status	Caseload per Provider	Interpretation
GREEN — Manageable	≤ 50	Workload aligns with ASHA-recommended caseload levels. Provider can deliver quality direct/indirect services and maintain compliance. This often includes supervision, evaluation, and IEP meeting representation for an SLP.
YELLOW — Elevated	51 – 65	Workload exceeds manageable threshold. Service quality and compliance documentation are at risk. Monitoring or SLPA support recommended. SLPA's must maintain adequate supervision.
RED — Critical	≥ 66	Workload significantly exceeds sustainable levels. Immediate staffing action required to prevent compliance violations and service degradation.

Table 10.1: ***Speech Caseload by Campus — Current Year***

Campus	Level	Speech Students	Staff Model	Delivery Type	Campus Ratio	Workload Status
Elementary Campuses						
Barbara Faskin Elementary	Elementary	97	2 SLP + 1 SLPA	In-Person / Contract	32	Manageable

Barbara Yarbrough Elementary	Elementary	106	2 SLPA	In-Person	53	Elevated ⚠
Ben Milam International Academy	Elementary	31	1 SLP + 1 SLPA	In-Person	16	Manageable
Bonham Elementary	Elementary	58	1 SLP + 1 SLPA	Virtual / Contract	29	Manageable
Burnet Elementary	Elementary	57	1 SLP + 1 SLPA	Virtual / Contract	29	Manageable
Bush Elementary	Elementary	64	1 SLP + 1 SLPA	Virtual / Contract	32	Manageable
De Zavala Elementary	Elementary	37	1 SLP + 2 SLPA	In-Person / Virtual	12	Manageable
Emerson Elementary	Elementary	61	1 SLP + 1 SLPA	Virtual / Contract	31	Manageable
Fannin Elementary	Elementary	103	2 SLP	Agency	52	Elevated
General Tommy Franks Elementary	Elementary	60	1 SLP + 1 SLPA	In-Person	30	Manageable
Greathouse Elementary	Elementary	74	2 SLP	Contract / Life Skills	37	Manageable
Henderson Elementary	Elementary	94	2 SLP + 1 SLPA	Contract / Agency	31	Manageable
Jane Long Elementary	Elementary	52	1 SLP + 1 SLPA	Contract	26	Manageable
Lone Star Trails Elementary	Elementary	62	1 SLP + 1 SLPA	In-Person	31	Manageable
Parker Elementary	Elementary	54	1 SLP + 1 SLPA	Contract	27	Manageable
Ralph Bunche Elementary	Elementary	49	1 SLP + 1 SLPA	Virtual	25	Manageable
Rusk Elementary	Elementary	58	1 SLP + 1 Sub	Contract / Life Skills	29	Manageable
Santa Rita Elementary	Elementary	76	1 SLP + 1 SLPA	Virtual	38	Manageable
Scarborough Elementary	Elementary	63	1 SLP + 1 SLPA	In-Person	32	Manageable
South Elementary	Elementary	56	1 SLPA	Agency	56	Elevated ⚠

Campus	Level	Speech Students	Staff Model	Delivery Type	Campus Ratio	Workload Status
Abell Jr High	Junior High	24	1 SLP + 1 SLPA	Virtual	12	Manageable
Alamo Jr High	Junior High	24	2 SLP + 1 SLPA	Virtual / Contract	8	Manageable
Goddard Jr High	Junior High	26	1 SLP + 1 SLPA	Virtual	13	Manageable
San Jacinto Jr High	Junior High	21	1 SLP + 1 SLPA	Virtual	11	Manageable
High School Campuses						
Legacy Freshman High School	High School	10	1 SLP + 1 SLPA	In-Person	5	Manageable
Legacy High School	High School	29	1 SLP + 1 SLPA	Virtual	15	Manageable
Midland Freshman High School	High School	9	2 SLPA	In-Person	5	Manageable ⚠
Midland High School	High School	31	1 SLP + 1 SLPA	Virtual	16	Manageable
Specialty Campuses						
Bowie	Specialty	35	1 SLP	Contract	35	Manageable
Carver Center	Specialty	24	1 SLP + 1 SLPA	Virtual	12	Manageable
Encore	Specialty	4	1 SLP	Virtual / Contract	4	Manageable
Pease-BL	Specialty	40	1 SLP + 1 SLPA	Contract	20	Manageable
Pre-K Academy at Midland College	Specialty	4	1 SLP + 1 SLPA	Virtual	2	Manageable
Young Women's Leadership Academy	Specialty	3	1 SLP	Contract	3	Manageable
DISTRICTWIDE TOTALS	—	**1,644**	**35 active campuses**	**Mixed**	**47 (avg)**	Manageable

⚠ Compliance Alert: Campuses Without Licensed SLP Coverage

Three campuses are currently staffed exclusively with SLPAs and/or agency assistants, with no licensed SLP assigned for direct supervision on-site. Under ASHA guidelines and Texas licensure law (22 TAC §741.62), SLPAs must practice under the direction and supervision of a licensed SLP. The following campuses require immediate SLP assignment:

- **Barbara Yarbrough Elementary** — 106 students served by 2 SLPAs only
- **South Elementary** — 56 students served by 1 SLPA (Bilingual) only
- **Midland Freshman High School** — 9 students served by 2 SLPAs only

Total students at risk of non-compliant service delivery: 171

Table 10.2: ***Provider Team Workload — Aggregate Caseload Across Campuses***

Because Midland ISD assigns SLP/SLPA teams to serve multiple campuses, the campus-level view understates actual provider workload. Table 12.2 presents the aggregate caseload each provider team carries across all assigned campuses the **true measure of workload sustainability.**

Provider Team	Team Composition	Delivery Type	Total Caseload	Caseload per Provider	# Campuses Served	Workload Status
Team 1	2 SLPA	In-Person	137	69	2	Critical ⚠
Team 2	1 SLP + 1 SLPA	In-Person	128	64	2	Elevated
Team 3	1 SLP + 1 SLPA	In-Person	104	52	2	Elevated
Team 4	1 SLP + 2 SLPA	In-Person	122	61	4	Elevated
Team 5	1 SLP + 1 SLPA	Contract	92	46	2	Manageable
Team 6	1 SLP	Contract	48	48	2	Manageable
Team 7	1 SLP + 1 SLPA	Contract	76	38	1	Manageable
Team 8	1 SLP + 1 SLPA	Virtual	119	60	3	Elevated
Team 9	1 SLP + 1 SLPA	Virtual	104	52	4	Elevated

Provider Team	Team Composition	Delivery Type	Total Caseload	Caseload per Provider	# Campuses Served	Workload Status
Team 10	1 SLP + 2 SLPA	Virtual / Contract	161	54	4	Elevated
Team 11	1 SLP (Life Skills)	Contract	77	77	3	Critical
Team 12	1 SLP + 1 SLPA	Virtual	141	71	3	Critical
Team 13	1 SLP + 1 SLPA	Virtual / Contract	140	70	2	Critical
Team 14	1 Sub Facilitator	Sub/Coverage	55	55	1	Elevated
Team 15	1 SLP	Contract	40	40	1	Manageable
Team 16	2 SLP	Agency (Good Seed)	110	55	1	Elevated
Team 17	1 SLPA (Bilingual)	Agency	54	54	1	Elevated ⚠
Team 18	2 SLP + 1 SLPA	Contract / Agency	94	31	1	Manageable
TOTALS	**18 teams**	**Mixed**	**1,644**	**55 (avg)**	—	Elevated

Districtwide Workload Summary

Key Metrics at a Glance:

- Total Speech Students Served: 1,644.
- Total Active Campuses: 35 (3 additional campuses with 0 caseload).
- Total Provider Teams:18.

Campus-Level View

- Campuses at Manageable (Green): 32 of 35 (91%).
- Campuses at Elevated (Yellow): 3 of 35 (9%).
- Campuses at Critical (Red): 0 of 35 (0%).

Provider Team-Level View **(True Workload)**

- Teams at Manageable (Green): 5 of 18 (28%).
- Teams at Elevated (Yellow): 9 of 18 (50%).
- Teams at Critical (Red): 4 of 18 (22%).

Delivery Model Breakdown

- In-Person Providers: 8 staff.
- Virtual Providers: 15 staff.
- Contract Providers: 15 staff.

The campus-level view creates an appearance of adequate staffing, with 91% of campuses falling within the Manageable range. However, this is driven by the multi-campus shared staffing model the same SLP/SLPA teams serve 2 to 4 campuses each. When workload is measured at the provider team level the only accurate view of actual caseload burden 72% of teams are operating at Elevated or Critical levels. Four provider teams carry caseloads exceeding 66 students per provider, and the district's heavy reliance on virtual (15 staff) and contract (15 staff) providers creates fragility in service continuity. Three campuses currently operate without any licensed SLP, posing immediate compliance risk under Texas licensure regulations.

Note: Campus caseload data reflects current enrollment and is drawn directly from Midland ISD's internal caseload tracking records. Staff names have been omitted consistent with personnel confidentiality protocols. Provider teams are identified by generic designators to protect individual privacy. Delivery type classifications (Virtual, In-Person, Contract, Agency) are derived from Midland ISD's placement records.



Special Education Leadership Team

The leadership team is comprised of six special education supervisors with foundational knowledge of program implementation; however, the absence of consistent executive leadership has left the team without clear strategic direction, decision-making authority, or cohesive guidance. Given the scale and complexity of the department including ongoing behavioral crises, parent concerns, disciplinary issues, and daily operational demands this leadership gap has resulted in a reactive system with limited capacity to provide consistent oversight, training, and accountability.

XII. Critical Needs Summary and Strategic Direction

A. Systemwide Critical Needs

Across all reviewed domains of student safety, staffing, instructional quality, and compliance, Midland ISD's Special Education system demonstrates dedicated staff effort within an organizational structure under sustained strain. The review identifies multiple interrelated priorities that must be addressed through unified, multi-year planning rather than isolated corrective actions. Key areas of need include:

1. **Safety and Compliance Infrastructure** – Immediate strengthening of camera workflows, restraint documentation, crisis response procedures, and supervision standards in self-contained settings to ensure full alignment with TEC §§38.004 and 29.022 and TEA monitoring expectations.

2. **Staffing Stabilization and Workforce Development** – Persistent shortages in certified staff (special education teachers, diagnosticians, dyslexia teachers, SLPs, and bilingual specialists) and heavy reliance on paraprofessionals and contract personnel represent the district's most pressing operational challenge.

3. **Instructional Coherence and Placement Practices** – Variability in LRE decisions, instructional routines, and IEP fidelity reflect the need for a clear, consistent continuum of services emphasizing inclusion, collaboration, and access to Tier 1 instruction.

4. **Evaluation Systems and Workload Management** – Excessive diagnostician and SLP caseloads, combined with growing bilingual service demand, have created compliance and quality risks. Transitioning to workload based staffing models and implementing virtual case management systems will help restore sustainability.

5. **Behavioral and Safety Supports** – High rates of OSS and DAEP placements for students with disabilities underscore the urgency of a districtwide behavior framework grounded in proactive supports, trauma-informed practices, and consistent administrator oversight.

6. **Governance, Data, and Monitoring Systems** – The absence of unified workload dashboards, caseload tracking, and IEP-to-service monitoring systems limits the district's ability to detect risk and ensure equitable service delivery. A coherent governance structure is necessary to guide compliance and continuous improvement.

B. Recommendation: Development of a 3- to 5-Year Strategic Plan

In alignment with the U.S. Department of Education's Office of Special Education Programs (OSEP) and its Results Driven Accountability (RDA) Framework, Midland ISD should adopt a comprehensive three- to five-year Strategic Plan for Special Education System Improvement. OSEP emphasizes that sustainable progress requires structured, multi-year improvement cycles that build organizational capacity, strengthen instructional quality, and ensure equitable access for students with disabilities.

To meet the diverse and growing needs of students receiving special education services, the district must align its strategic plan with both performance goals and fiscal realities. While recent years have brought progress in refining instructional practices and expanding access to supports, sustainability remains a defining challenge. Reductions in evaluation staffing, instructional leadership, and professional development have constrained the district's ability to deliver consistent, high-quality services across campuses. Addressing these gaps requires purposeful alignment of improvement strategies with a financial model that ensures long-term stability and growth.

A sustainable plan must begin by acknowledging the interdependence between staffing capacity, instructional quality, and budget planning. The Special Services department's current 11.6% vacancy rate, particularly concentrated among instructional assistants and certified special educators, reflects the strain of competing for specialized talent while maintaining operational efficiency. This staffing instability directly influences student access to timely evaluation, specialized instruction, and compliance adherence which are core indicators under OSEP's Results-Driven Accountability (RDA) framework. Bridging these gaps demands a district-level strategy that weaves together data-informed staffing practices, fiscal prioritization, and continuous improvement systems.

The district's strategic plan will serve as a roadmap for sustained excellence across key domains: safety, staffing stability, instructional access, evaluation fidelity, compliance monitoring, and resource allocation. Embedding financial strategy into every phase from needs assessment to program implementation will strengthen the district's ability to maintain effective teams, design responsive training systems, and reduce reliance on short-term contracted services.

By linking budget priorities to measurable benchmarks and annual review processes, Midland ISD can ensure that every investment in the Special Services program directly enhances instructional impact and student success. This integration of financial planning with academic and operational goals positions the district not only to meet compliance standards but to develop a sustainable, student-centered model.

Recommendations

To support immediate stabilization while maintaining a realistic and sustainable pace of change, the recommendations in this section are organized with prioritized timelines for implementation with emphasis on prioritization. These actions are not intended to be launched or systematized all at once, nor should the district attempt to implement every recommendation simultaneously. Instead, the recommendations provide a structured sequence for Midland ISD to analyze, plan, and phase in over a 3–5-year period with dedicated roles and responsibility.

This phased approach acknowledges the volume and complexity of the work, the need for stable procedures and processes, and the importance of building staff capacity through training and consistent implementation. By progressing in deliberate stages, the district can strengthen foundational systems, ensure changes are sustainable, and allow each phase to stabilize before advancing to the next.

HIGHEST-PRIORITY AREAS (Action Required):

1. Student Safety & Crisis Response Systems — Systemic gaps in restraint documentation, crisis training, and safety monitoring require immediate attention to ensure safe learning environments.
2. Operationalizing Systems & Processes — Absence of written special education procedures has resulted in inconsistent implementation across campuses.
3. Behavior Supports & Disciplinary Placement — With 383 OSS incidents and 147 DAEP placements, the district is in Significant Disproportionality Year 3, requiring systemic redesign of behavior support systems.

HIGH PRIORITIES (Structured Improvement Required):

4. Life Skills & Specialized Settings Instructional Quality — Significant variability in program implementation with ULS curriculum adopted but lacking implementation guidance.
5. Strategic Staffing & Workforce Development — Critical shortages including 10-12 resource teachers, 16 paraprofessionals, and diagnostician caseloads reaching 60-236 students.
6. IEP Development, Content & Fidelity — IEP development compliance at 31% (8/26 folders) indicates urgent need for training and quality assurance systems.

MODERATE/MAINTENANCE PRIORITIES:

7. LRE, Placement & Continuum of Services — No standardized placement protocols or documented program descriptions.
8. Child Find, Evaluation, FAPE, IEP Implementation, ARD & State Assessment — Maintain current 100% compliance while documenting systems for sustainability.
9. Evaluation System Stabilization — 84% of diagnosticians at elevated/critical workload with 571 pending referrals.

HIGHEST-PRIORITY AREAS (Action Required):

Student Safety & Crisis Response Systems

Immediate Action (0-90 days)

- Develop and publish Safe Operating Conditions Standards for all high-needs self-contained settings, including staffing ratios, supervision protocols, physical environment requirements, and crisis response alignment expectations
- Establish staffing coverage requirements and contingency protocols: define minimum adult-to-student ratios by setting type; create substitute/backup coverage procedures; implement real-time coverage tracking
- Develop safety incident reporting protocol for special education settings to include tracking restraint data, seclusion data, and serious behavior incidents to produce quarterly reporting
- Formalize camera compliance procedures
- Develop campus administration walkthrough protocols with fidelity rubrics for special education settings

Short Term (90-180 days)

- Implement weekly campus administration walkthrough cadence
- Train all administrators and produce walkthrough schedules for all high needs campuses
- Train all staff in CPI/NCI by prioritizing high needs campuses first
- Implement monthly supervisor walkthroughs of high needs campuses

Operationalizing Systems & Processes

Immediate Action (0-60 days)

- Conduct comprehensive inventory of existing written procedures across all SPED operational areas; identify critical gaps
- Define organizational structures, role definitions, and decision-making authority for central office and campus levels; address Executive Director vacancy

Short Term (60-180 days)

- Develop and codify core Special Education Procedures Manual (LRE, placement, DAEP, evaluation, ARD, discipline, safety, compensatory services, progress monitoring)
- Create standardized workflows and decision-making flowcharts for all core processes
- Train all SPED leadership, supervisors, and campus administrators on new procedures and workflows
- Implement governance monitoring with quarterly compliance checks, annual review cycle, and caseload dashboards; implement CEC/ASHA-aligned workload frameworks

Behavior Supports & Disciplinary Placement

Immediate Action (0-90 days)

- Establish and publish minimum adult coverage requirements by program type (instruction, transitions, toileting/personal care) and create a daily campus coverage plan (assigned backups, substitute/float process) so no self-contained classroom is uncovered.
- Implement a classroom supervision plan template (positioning, scanning routines, assigned zones, restroom and hallway procedures, arrival/dismissal roles) and required known supervision assignments for every instructional block and transition
- For students with high-risk needs, ensure IEP supports and BIP / crisis plans include triggers, early warning signs, de-escalation steps, responses, and reentry routines; review plans with all assigned staff and document acknowledgment.

Short Term (90-180 days)

- Identify required staff for CPI by classroom, schedule initial and refresher sessions, and implement a standardized "request for assistance" protocol (who to call, how, response time expectations).
- Implement Tier 2 behavior interventions: Check-in/Check-Out (CICO), social-emotional small groups, behavior skills training curriculum, trauma-informed practices
- Standardize prevention routines (transition check-ins, door/threshold procedures, staff positioning) and require student-specific elopement plans when indicated; align rapid communication steps with district policy and test communication procedures each grading period. (Elopement prevention and response).

HIGH PRIORITIES (Structured Improvement Required):

Life Skills & Specialized Settings Instructional Quality

Within 180 days

- Establish non-negotiable classroom structures for all specialized settings: posted student schedules, staff schedules and rotation plans, visual supports, structured routines, organized environments
- Implement ULS with initial fidelity expectations: training for all life skills teachers, clear guidance documents, minimum expectations for daily lesson delivery and student engagement
- Address immediate staffing and classroom capacity: reduce class sizes to appropriate ratios; prioritize certified teacher placement; fill critical para vacancies

Within 9 months

- Conduct districtwide specialized program continuum review: inventory all programs, feeder patterns, and placement criteria; develop standardized program descriptions

Within 36 months

Implement ULS with full fidelity through coaching cycles and monitoring rubric; align with CBI opportunities; establish community partnerships for vocational experiences for students 14+

Strategic Staffing & Workforce Development

Immediate (0-90 days)

- Fill critical vacancies: prioritize diagnosticians, LSSPs, SLPs, behavior specialists; post early contracts; reassign ATs to non-case-management roles
- Reduce caseloads at highest-need campuses: redistribute extreme outliers (200+ caseloads); implement ASHA/CEC workload frameworks; create districtwide caseload tracking dashboard

Short Term (90-180 days)

- Launch Grow-Your-Own (GYO) pipeline: para-to-teacher advancement with tuition reimbursement; first GYO cohort for 2026-27

Years 2-3

- Year 2-3 expansion: add 3 dyslexia teachers; expand co-teach models at secondary; increase university residency placements; develop bilingual evaluator and SLP pipelines; establish career pathways with SPED Teacher Lead roles and recognition programs

IEP Development Content and Fidelity

Within 9 months

- Conduct baseline compliance audit of all active IEPs across the district; identify specific deficiency patterns and staff skill gaps through surveys and folder review analysis
- Design and deliver intensive IEP development training series for all special education staff addressing identified skill gaps, TEA compliance requirements, and standards-based IEP practices
- Strengthen transition services: targeted transition planning PD; implement age-appropriate transition assessment protocol; strengthen community agency partnerships
- Establish monthly IEP compliance audit cycle with random folder sampling (minimum 10% of active IEPs per month); quarterly progress review with leadership

Within 1 Year

- Create IEP development resource toolkit: compliance checklists, exemplar IEPs, decision guides, quick-reference cards
- Implement pre-submission IEP quality review protocol with designated reviewers screening all IEPs before finalization; develop and distribute IEP Compliance Checklist

MODERATE/MAINTENANCE PRIORITIES:

LRE, Placement & Continuum of Services

Within 9 months

- Map current continuum of services; identify gaps in LRE placement options at each campus and grade band
- Establish district-level LRE Review Team to evaluate placement decisions and ensure data-driven, student-centered ARD recommendations

Within 1 year

- Develop standardized LRE placement protocols with placement rubric, entry/exit criteria for all programs, and data-based placement decision tools
- Provide targeted professional learning for general education teachers on differentiated instruction, accommodations, and collaboration with SPED staff
- Develop and implement co-teaching and inclusion support models at priority campuses

Within 2 years

- Expand inclusion models to all campuses; create resource rooms and flexible instructional groupings; establish placement tracking system

Child Find, Evaluation, FAPE, IEP Implementation, ARD & State Assessment

Short term (90 days)

- Document current effective processes and systems that maintain 100% compliance for replication across other improvement areas

Quarterly Process

- Monitor for emerging risks through quarterly data reviews; implement early warning system for compliance drift

Annual Process

- Continue and reinforce staff training on Child Find, evaluation, and ARD procedures to prevent regression
- Establish annual internal audit cycle for all maintenance-level compliance areas to ensure sustained performance
- Leverage compliant areas as models and anchors for systemwide improvement; share practices across priority areas
- Prepare for annual TEA monitoring reviews; maintain documentation and readiness at all campuses

Evaluation System Stabilization

Immediate (0-60 days)

- Adopt and operationalize workload frameworks by defining districtwide caseload/workload guidelines
- Reduce diagnostician adjusted workloads to <110 by redistributing cases (ongoing/review monthly)

Within 9 months

- Implement real-time caseload and workload dashboards that display current metrics for positions across the district.

Within 1 year

Fill critical evaluation vacancies (+5 FTEs) through focused hiring event

XIII. Conclusion

Special Education Solutions, LLC extends its sincere appreciation to Midland Independent School District for its transparency, professionalism, and demonstrated commitment to continuous improvement throughout the course of this review. The district's willingness to engage in a rigorous examination of its systems and practices reflects a clear dedication to building equitable, compliant, and high-quality special education services for all students.

As Midland ISD advances into the next phase of its improvement efforts, Special Education Solutions will continue to provide targeted support to strengthen system coherence and leadership capacity. This includes delivering workload analysis resources and exemplars, as well as a strategic plan framework designed to guide the onboarding and early work of the incoming Executive Director of Special Education. These tools will support the new leader in establishing priorities, aligning resources, identifying key metrics, and engaging stakeholders in the development of a comprehensive multi-year strategic plan.

With continued collaboration, thoughtful implementation of the recommendations outlined in this report, and the development of a structured, multi-year improvement plan, Midland ISD is well-positioned to translate these findings into sustainable system enhancements. These efforts will strengthen instructional quality, reinforce compliance, and ensure that every student with a disability receives a free and appropriate public education in the least restrictive environment.



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Appendix A — Additional Staffing Improvement Considerations

These items are provided as optional considerations for Midland ISD to review, prioritize, and adopt as needed over a 3–5-year period. They serve as a menu of potential approaches the district may choose to pursue now or in the future, based on identified needs, available capacity, and evolving priorities.The district may incorporate any combination of these considerations into its strategic plan as appropriate.

These staffing considerations are intended to guide Midland ISD in strengthening capacity, stabilizing workloads, and improving service delivery. They are not intended for simultaneous implementation; rather, they provide a menu of options the district may adopt over time based on need, resources, and strategic priorities.

1. Dyslexia Staffing Improvements

- Increase the number of dyslexia teachers to ensure dedicated interventionists at each elementary campus.
- Assign 2–3 dyslexia teachers exclusively to secondary campuses to prevent service gaps.
- Transition high-caseload elementary campuses to a campus-based dyslexia model.
- Implement a centralized caseload management system to monitor student-to-teacher ratios and work-load equity.

2. Strategic Staffing System Enhancements

A. Attract High-Quality Staff

- Implement market-responsive stipends for hard-to-fill roles (SPED teachers, dyslexia teachers, paraprofessionals).
- Offer signing, retention, and multi-year commitment incentives.

B. Multi-Year Staffing Model (District Option)

- Stabilize staffing in Year 1, expand capacity in Year 2, and sustain balanced workloads in Year 3.
- Build predictable pipelines producing internal SPED teachers annually.

3. Diagnostician Staffing Improvements

- Redistribute caseloads to reduce extreme workload variance.
- Assign dedicated diagnosticians to high-volume secondary campuses.
- Add diagnostician FTEs to reach manageable workload thresholds (≤110 adjusted workload).
- Expand Assessment Facilitator positions to support high-volume campuses.
- Establish a bilingual evaluation team to address concentrated bilingual referral needs.
- Implement a centralized referral triage system to distribute evaluations equitably.
- Develop an annual referral forecasting model to anticipate staffing needs.

4. Speech-Language Pathology (SLP) Staffing Improvements

- Adopt ASHA's workload-based staffing model to ensure equitable distribution of direct and indirect service time.
- Strengthen SLPA supervision structures with documented agreements and fidelity checks.
- Recruit bilingual SLPs and formalize interpreter-supported evaluation protocols.
- Implement virtual case management and evaluation support systems.
- Establish districtwide governance for assigning SLP/SLPA teams based on workload, bilingual needs, and program demands.
- Add SLP FTEs to address campuses without licensed coverage and reduce critical caseloads.
- Deploy SLPA positions strategically to high-need teams.
- Pilot group service delivery models at high-volume campuses.
- Create an itinerant SLP pool for coverage during leave or evaluation surges.
- Reduce reliance on contract providers to improve continuity of services.

Appendix B — Program Improvement Considerations

These items are provided as optional considerations for Midland ISD to review, prioritize, and adopt as needed over a 3–5-year period. They serve as a menu of potential approaches the district may choose to pursue now or in the future, based on identified needs, available capacity, and evolving priorities. The district may incorporate any combination of these considerations into its strategic plan as appropriate

These program improvement considerations outline potential actions Midland ISD may adopt to strengthen compliance, instructional quality, behavior systems, and program coherence. They are not intended for immediate or simultaneous implementation; the district may select and phase in items based on readiness, capacity, and strategic priorities.

1. Student Safety & Security Systems

- Implement a districtwide compliance framework ensuring all audio/visual systems meet statutory requirements.
- Standardize documentation for camera requests, approvals, and installation processes.
- Align storage and access procedures with TEA guidance and privacy laws.
- Establish ongoing monitoring to verify operational safety systems in all designated self-contained classrooms.

2. Placement, LRE, and Instructional Quality Systems

- Develop integrated systems for monitoring caseloads, service delivery, timelines, safety incidents, and program quality.
- Provide staff development to strengthen LRE decision-making and improve student outcomes.
- Ensure curriculum, instruction, ARD practices, IEP development, and LRE determinations function as a coherent system.
- Establish consistent expectations for IEP quality and implementation across campuses.
- Develop predictable, standards-aligned instructional experiences for students with disabilities.
- Create program guidance outlining expectations, aligned practices, and progress-monitoring structures.

3. Districtwide Behavior Support System

A. Behavior Response Framework

- Create standardized crisis response protocols aligned with TEA expectations.
- Implement a districtwide escalation, restraint, and parent-notification flowchart.
- Develop a professional development plan for behavior intervention and de-escalation training.

B. Discipline Data & Monitoring

- Track OSS, ISS, DAEP, restraint, and seclusion data by campus, race, disability category, and program.
- Conduct regular principal reviews of discipline data.
- Collaborate with Student Services to reduce reliance on DAEP placements for students with disabilities.
- Reduce class sizes in specialized settings to support BIP implementation and FAPE.
- Ensure adherence to special-circumstance disciplinary rules.

C. Training & Capacity Building

- Maintain current CPI/NCI certification cycles for all self-contained staff.
- Conduct BIP fidelity checks for students with repeated removals.
- Consider trauma-informed training, crisis response teams, and reintegration plans for returning students.
- Assign behavior specialists to feeder patterns with the highest needs.

D. Behavior Support Team & Tiered Interventions

- Establish a district behavior support team (Director, Behavior Specialists, BCBA, Crisis Response Coordinator).
- Implement Tier 2 interventions such as Check-In/Check-Out, social-emotional groups, and behavior skills training.
- Utilize school psychologists or special education counselors for students in specialized behavior programs.

E. Program Safety & Continuum Development

- Develop a districtwide Behavior Safety Playbook outlining structures, systems, and expectations for specialized programs.
- Integrate academic and behavior supports within an MTSS framework.
- Strengthen instructional expectations, staffing stability, classroom routines, and supervision systems.
- Redesign alternative placement pathways with restorative options and reintegration plans.
- Build administrator capacity in SPED discipline, manifestation determinations, BIP implementation, and crisis response.
- Promote a culture of prevention through PBIS and proactive supports.

4. Evaluation Systems & Virtual Support

- Implement a centralized electronic case management system for diagnosticians, LSSPs, and evaluation clerks.
- Utilize remote review teams for compliance checks, evaluation planning, and progress monitoring.
- Develop real-time dashboards for workload equity and timeline monitoring.
- Use structured virtual evaluation scheduling to support TEA compliance.
- Deploy certified virtual consultants for evaluation triage and documentation review.

Appendix C: Sample Workload Analysis Tool

Special Education Staffing & Caseload Planning Framework

Adapted from TASB Workload Analysis Standards and TEA Strategic Staffing Framework

Midland Independent School District

Purpose:

This workload analysis tool provides Midland ISD with a structured process for reviewing staffing sufficiency, service delivery expectations, and equitable workload distribution across special education roles. It can be used annually (spring planning and mid-year adjustment) to ensure alignment between staffing resources, program complexity, and student needs.

Section I: Core Principles

1. **Student-Centered Allocation** – Staffing is based on student need and service minutes, not historical counts or campus size.
2. **Role-Specific Workload Standards** – Caseload targets incorporate both direct and indirect service demands (e.g., ARDs, progress reports, evaluations).
3. **Balanced Ratios** – Staffing ratios should reflect TEA, CEC, NASP, and ASHA recommendations for safety, compliance, and instructional access.
4. **Workload Equity** – Campuses with complex behavioral or specialized program demands receive weighted allocations.
5. **Dynamic Adjustment** – Caseload monitoring dashboards guide real-time adjustments as enrollment and student needs fluctuate.

Section II: Caseload & Workload Metrics

The following table compares recommended caseload ranges to current estimated conditions across key special education roles within Midland ISD.

Role	Recommended Range	Midland ISD Current Estimate	Variance / Need
Resource / Inclusion Teacher	20–25 students (mild/moderate needs)	~35–40 average	**+10–15 per teacher**
Life Skills / Self-Contained Teacher	6–8 students per class	10–12 in some sites	**Overcapacity**
Paraprofessional Support	1:3 ratio (self-contained)	Often 1:5 or higher	**+1–2 paras per high-need class**
Educational Diagnostician	60–80 active cases	120–230 per current data	**+8–10 FTE needed**
LSSP (School Psychologist)	Max. 1:1,200 students / 50 evals per year	1:2,000+ est.	**+2–3 FTE needed**
Speech-Language Pathologist (SLP)	55–60 per SLP or up to 110 SLP/SLPA team	Many >100	**+6–8 SLP FTE**
SLPA (Assistant)	Supervised by licensed SLP	Several campuses w/ limited supervision	**Align to ASHA supervision ratio**
Dyslexia Teacher	25–35 students per caseload	Up to 50+ per campus	**+8–10 FTE**
Behavior Specialist	1 per feeder pattern (approx. 4–6 total)	2 current (districtwide)	**+4 positions recommended**

Section III: Sample Annual Workload Analysis Process

Step 1: Data Collection (Quarter 3 – February–March)

- Pull TAPR, PEIMS, IEP service minutes, and campus enrollment by disability category.
- Gather ARD counts, service minutes, and staff FTE by campus.
- Calculate student-to-staff ratios and caseload distribution.

Step 2: Analysis & Benchmarking

- Compare current caseloads to recommended ranges (see Section II table).

- Identify campuses exceeding threshold ratios or missing positions.
- Flag specialized programs (BSC, LEAP, Autism) for weighted adjustment.

Step 3: Weighted Workload Formula

Use weighted tiers to account for program intensity:

$$\text{Workload Index} = (S_1 \times 1.0) + (S_2 \times 1.25) + (S_3 \times 1.5)$$

Where:

- $\mathbf{S_1}$ = Students requiring inclusion/resource services
- $\mathbf{S_2}$ = Self-contained moderate programs (LEAP, Autism)
- $\mathbf{S_3}$ = High-needs behavioral or life skills classrooms
- **Target Index per Teacher:** ≤ 25 weighted points

Step 4: Workload Dashboard (Quarterly Monitoring)

- Create dashboards tracking number of students served, required service minutes, and open referrals.
- Highlight campuses above 20% of threshold capacity.
- Initiate support or staffing adjustments as needed.

Section IV: Example Caseload Review Template

Campus: _____ **Date:** _____

Program: ☐ Resource ☐ Life Skills ☐ Autism ☐ Dyslexia ☐ Speech

Staff Role	Students Served	% Tier 2/3	Service Minutes	Weighted Index	Status
Resource Teacher	28	35%	1,200	28.4	☑ Within Range
Life Skills Teacher	10	100%	2,400	30.0	⚠ Overload
Diagnostician	185	—	—	—	🚨 Critical Load
SLP	95	25% bilingual	2,100	—	⚠ Overload

☑ Within Target Range	⚠ Monitor / Overload	🚨 Immediate Action Required

Section V: Reporting & Use

Each semester, the Special Education Department should produce a **Workload Summary Report** that includes:

- Current staff-to-student ratios by campus/role
- Workload variance (%) compared to TEA-aligned targets
- Recommended staffing adjustments (additions or redistributions)
- Summary of service minutes not covered due to staffing shortages
- Risk analysis for evaluation timelines and compliance

This report can be presented to Cabinet and the School Board as part of budget and staffing justification aligned to review and TEA monitoring requirements.

Section VI: Planning Checklist for Implementation

Action Step	Responsible Party	Timeline
Compile districtwide caseload and staffing data	SpEd Director / HR	February–March
Establish TEA-aligned caseload thresholds	Executive Director / HR	March
Review balancing options, staffing gaps	SpEd Leadership	April
Incorporate findings into annual budget plan	CFO / HR / SpEd	May–June
Implement and track quarterly updates	SpEd Supervisors / Principals	Quarterly
Present annual report to Cabinet & Board	Superintendent / SpEd Director	Fall Review

Section VII: Suggested Next Steps for Midland ISD

6. Load current staffing and caseload data into this template.
7. Apply TASB benchmarks and workload formula to identify overcapacity campuses.
8. Prioritize shortages and build recruitment tiers (for teachers, diagnosticians, dyslexia staff).
9. Integrate with HR and budget cycles to align funding, stipends, and onboarding timelines.
10. Use the dashboard quarterly to proactively manage workload equity.

This tool is intended as a planning resource and should be adapted to reflect current district data, TEA guidance updates, and local staffing conditions. Annual review and revision is recommended.



Special Education Solutions, LLC