



TCASE
SERVICES BY DESIGN

EAGLE PASS ISD
SPECIAL EDUCATION PROGRAM REVIEW

EXECUTIVE SUMMARY

SPRING 2026

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INTRODUCTION

Eagle Pass Independent School District (EPISD) requested a comprehensive review of the district's special education program to better understand current practices, identify strengths, and determine opportunities for system improvement. At the district's request, TCASE Services by Design conducted the program review in February 2026. This report summarizes the findings and recommendations and was made available to the district in March 2026.

This review was conducted in collaboration with district leadership and staff. Throughout the process the district provided access to documentation, campuses, data, and personnel necessary to evaluate program systems and procedures. The purpose of this collaborative approach was to ensure that findings accurately reflect district practices and that recommendations are aligned with the district's operational context.

The review process focused on how systems, procedures, and campus practices support the delivery of high-quality instruction and services for students receiving special education services. Particular attention was given to ensure that students have meaningful access to grade-level curriculum, appropriate supports, and inclusive educational opportunities.

The purpose of this report is to provide information that supports district leaders in making informed, compliant decisions about program implementation and improvement. The findings highlight areas of strength and identify opportunities to improve efficiency, strengthen compliance with federal and state requirements, and enhance service delivery so that students receiving special education services have access to high-quality instruction and appropriate supports in the least restrictive environment.

METHODOLOGY

Multiple data sources ensured a comprehensive and balanced analysis including document review, campus site visits, focus groups, interviews with district and campus staff, and analysis of available program and staffing information.



9 campus visits

In February 2026, TCASE Services by Design visited 9 campuses where principal interviews and classroom visits were conducted. A list of sites is listed in Appendix A.

294 survey responses

All staff and parents of students with disabilities were invited to participate in a survey. Information from participants provided insights into EPISD's special education services.



40+ Documents

As part of the comprehensive review, the TCASE Services by Design team reviewed and analyzed more than 40 documents provided by EPISD. The documents gave a view into processes, procedures, and staffing.

15 student folders

15 student individualized education programs (IEPs) were reviewed. The folders were randomly selected and reflected a range of eligibility and grade bands.



23 focus groups & interviews

In addition to the 9 campus principal interviews, 10 interviews and 13 focus groups were conducted with both central office and campus groups to gain insight on how special education services operate in EPISD.



BACKGROUND

EPISD serves the community of Eagle Pass, Texas, a border city located in Maverick County along the Rio Grande. The district serves approximately 13,500 students across its campuses and has maintained a state accountability rating of B. This rating reflects consistent academic performance and stable district systems.

The community maintains a strong local identity shaped by its geographic location, cultural heritage, and long-standing family connections. Many educators, staff members, and district leaders are lifelong residents of the area. This continuity contributes to a deep understanding of the community and a strong commitment to supporting local students and families.

The district's workforce reflects this stability. Teachers in EPISD average 15.6 years of experience with an average of 14.9 years of service within the district which is notably higher than the state average. Campus leadership also demonstrates strong experience and continuity with principals averaging 10 years of experience, most of which has been within the district. This level of longevity supports consistent implementation of district systems and helps maintain strong relationships between schools and the community.

Eagle Pass is a predominantly Hispanic community with a bilingual population and a significant number of students who qualify for economically disadvantaged services. As is common in many border communities, schools play a central role in community life and serve as an important hub for services and support for students and families.

These community characteristics contribute to the district's strengths including strong relationships with families, experienced educators, and a shared commitment to student success. Understanding the local context is important when reviewing district systems and practices, as the community's culture, stability, and relationships influence how programs are implemented and sustained across campuses.

District enrollment has remained relatively stable over the past several years with total enrollment gradually declining from approximately 14,500 students in the 2019–2020 school year to about 13,450 students in 2025–2026. During this same period, the proportion of students receiving special education services has steadily increased, rising from just over 10 percent of enrollment to more than 17 percent. At the same time, the number of students served through Section 504 has declined, and dyslexia identification has fluctuated slightly. These trends suggest that a portion of students who might previously have received dyslexia services through Section 504 are now being identified and served through special education which reflects a shift in how student needs are evaluated and supported within district programs.

Enrollment							
School Year	Total Students	Special Education	% Special Education	Dyslexia	% Dyslexia	504	% 504
2019-2020	14,500	1,560	10.76%	362	2.50%	967	6.7%
2020-2021	14,028	1,534	10.94%	392	2.79%	984	7.0%
2021-2022	13,385	1,458	10.89%	381	2.85%	860	6.43%
2022-2023	13,935	1,621	11.63%	408	2.93%	809	5.81%
2023-2024	13,869	1,807	13.03%	451	3.25%	792	5.71%
2024-2025	13,820	2,085	15.09%	481	3.48%	733	5.30%
2025-2026	13,450	2,311	17.18%	378	2.81%	619	4.60%

*Information from Texas Education Agency (TEA) Student Program and Special Populations Reports
2025-2026 Data provided by EPISD*

Eligibility

Special education eligibility establishes the criteria a student with a disability must meet to receive special education and related services. Determining eligibility accurately is an essential step in ensuring that students receive a free appropriate public education (FAPE) through an individualized education program (IEP) that addresses their identified educational needs. In Texas, eligibility for special education services is determined for students ages three through 21 based on the disability categories established in state and federal law.

Eligibility categories	
• Autism (AU) • Deaf and Hard of Hearing (DHH) • Deaf-Blindness (DB) • Emotional Disability (ED) • Intellectual Disability (ID) • Multiple Disabilities (MD) • Orthopedic Impairment (OI)	• Other Health Impairment (OHI) • Specific Learning Disability (SLD) • Speech Impairment (SI) • Traumatic Brain Injury (TBI) • Visual Impairment (VI) • Non-Categorical Early Childhood (NCEC) • Developmental Delay (DD) (replaced NCEC in 2025-2026)

The following chart compares special education eligibility categories for the 2024–2025 school year. The data show the percentage of students served in special education by primary disability category for students ages three through 21. Comparing these distributions with regional and statewide patterns helps identify trends, potential outliers, and areas that might warrant additional review related to referral practices, evaluation procedures, and service delivery.

PEIMS data 2024-2025													
	OI	OHI	DHH	VI	DB	ID	ED	SLD	SI	AU	DD	TBI	NCEC
EPISD	NA	14.21%	0.62%	NA	NA	5.68%	3.37%	43.69%	17.05%	10.98%	NA	NA	4.38%
Region 20	0.29%	11.24%	0.64%	0.31%	0.05%	7.63%	5.27%	41.09%	17.26%	14.09%	0.19%	0.11%	1.83%
Texas	0.37%	11.10%	0.86%	0.42%	0.06%	8.53%	5.03%	39.05%	15.99%	16.72%	0.10%	0.14%	1.62%

2024-2025 Public Education Information Management System (PEIMS)

Overall, the district's distribution of special education eligibility categories is generally aligned with both Region 20 and statewide patterns. This alignment suggests that the district's referral, evaluation, and eligibility determination processes are largely consistent with broader regional and state trends.

Although the overall distribution is comparable, a few areas might warrant additional review due to statistically significant differences when compared with regional and state patterns. In particular, the district shows higher representation in other health impairment, specific learning disability, and non-categorical early childhood while autism, intellectual disability, and emotional disability appear lower than regional and state patterns.

Reviewing evaluation practices and eligibility determinations in these areas might help ensure that disability characteristics are consistently differentiated and that identification decisions are supported by comprehensive evaluation data.

State assessment data

The 2025 state of Texas assessment of academic readiness (STAAR) results for students receiving special education services provide an overview of academic performance across reading language arts (ELAR), mathematics, and end-of-course (EOC) assessments and allow comparison to Region 20 and the state.

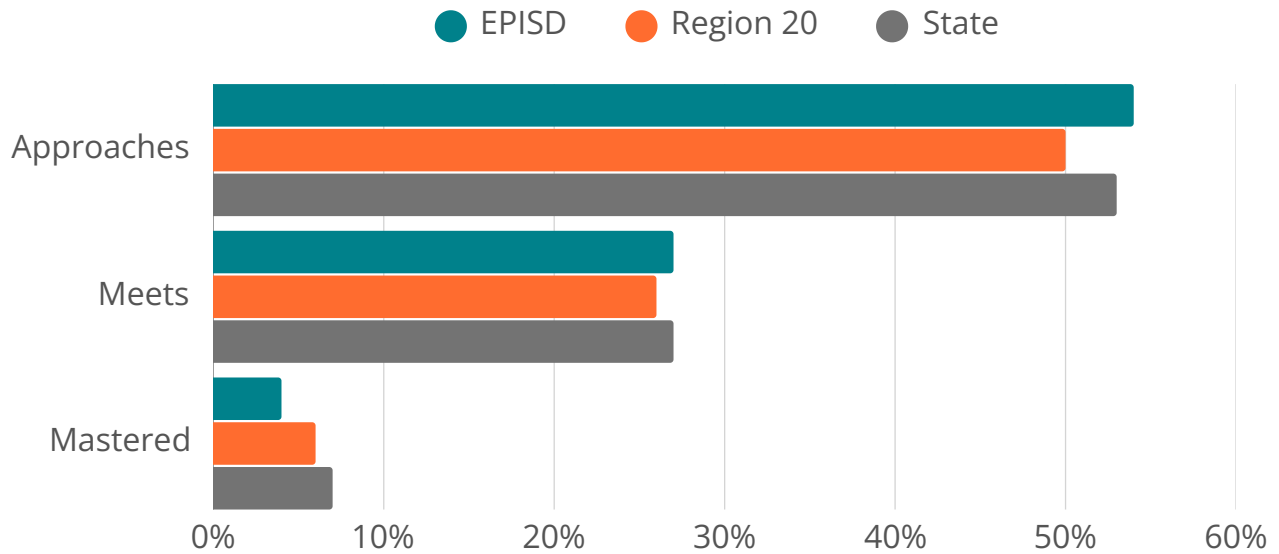
A review of district performance in comparison with Region 20 and statewide outcomes indicates that EPISD generally performs at or above regional and state averages across several assessed areas for students receiving special education services. In multiple grade levels and content areas, the district demonstrates stronger performance than both the region and the state. This suggests that instructional practices and campus-level supports are effectively helping many students access grade-level curriculum and demonstrate progress on statewide assessments.

These results indicate that the district has established instructional systems that support student participation in general education settings and promote academic growth for students receiving special education services.

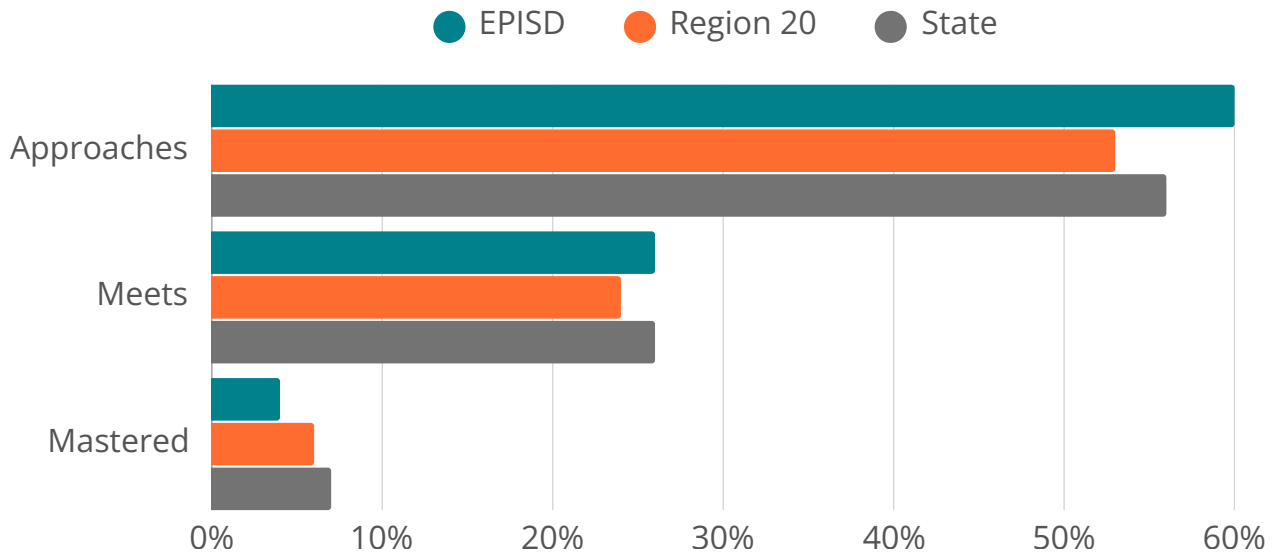
However, a few areas show performance slightly below regional or state trends. These areas might benefit from additional review to ensure strong alignment between IEP goals, classroom instruction, and targeted interventions.

Overall, the district's performance patterns reflect a system that is functioning effectively and, in many cases, producing outcomes that exceed regional and state comparisons. Continued focus on instructional alignment, progress monitoring, and targeted support in identified areas can help the district sustain strong performance while further improving outcomes for students receiving special education services.

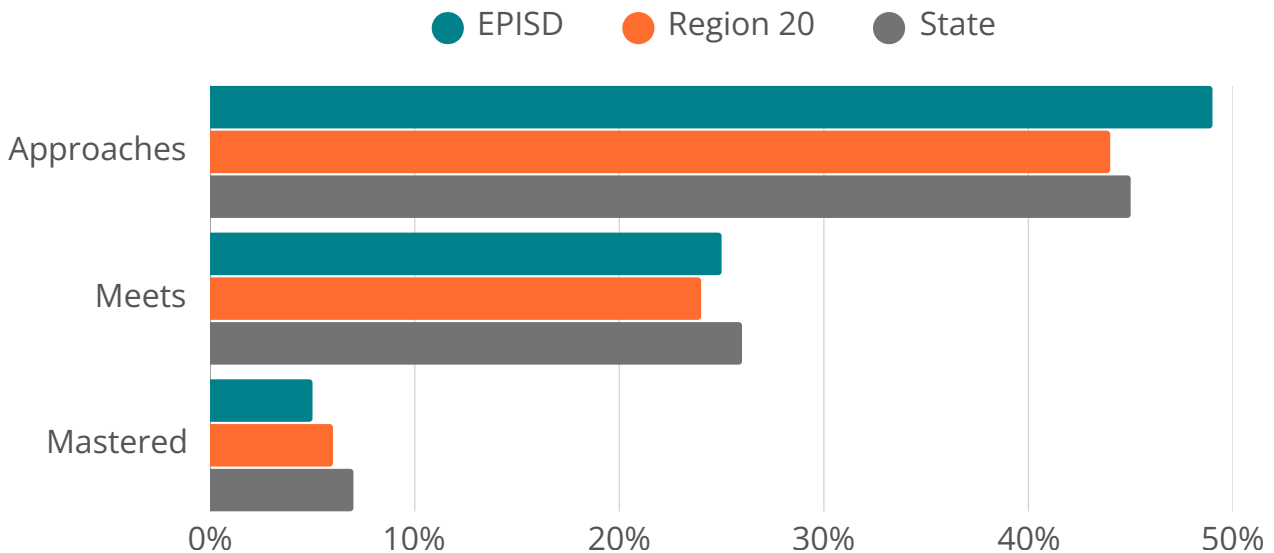
STAAR RLA Grade 3 Special Education Spring 2025



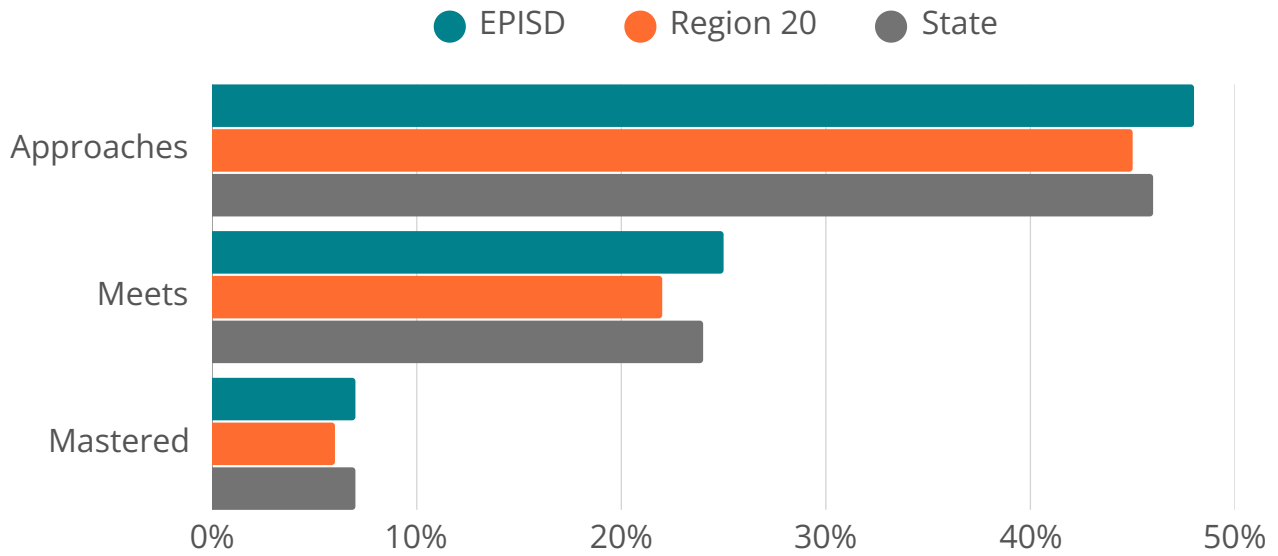
STAAR RLA Grade 4 Special Education Spring 2025



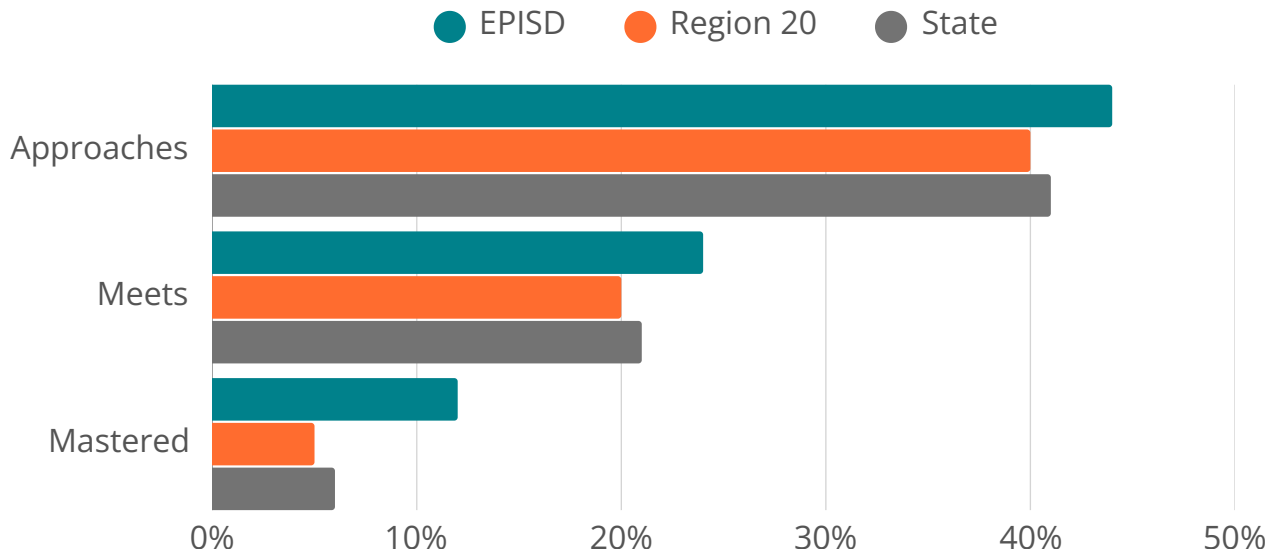
STAAR RLA Grade 5 Special Education Spring 2025



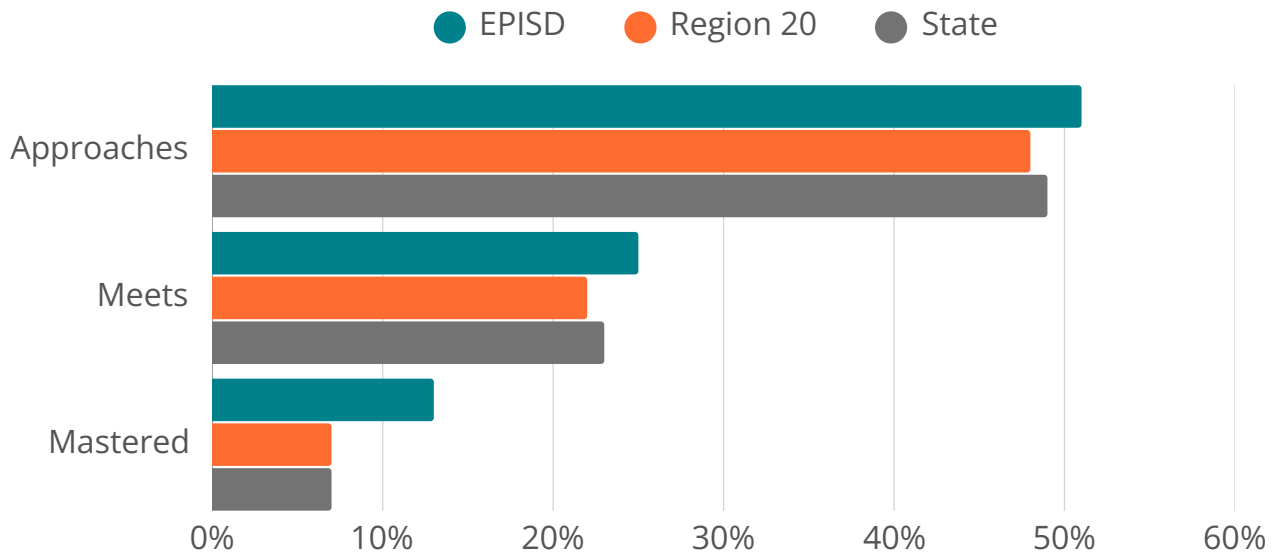
STAAR RLA Grade 6 Special Education Spring 2025



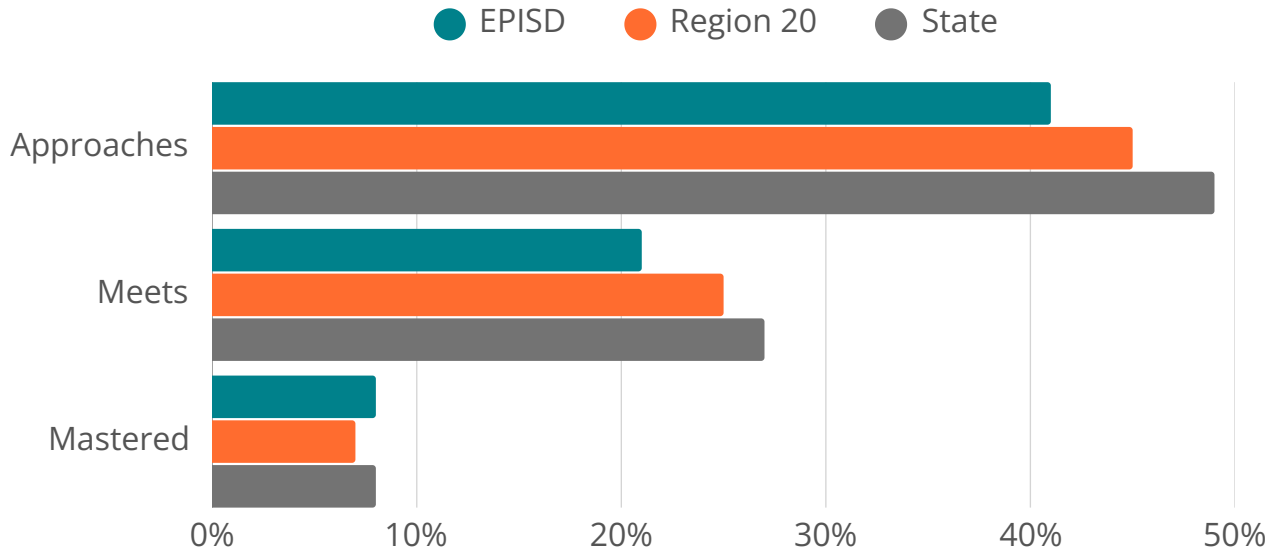
STAAR RLA Grade 7 Special Education Spring 2025



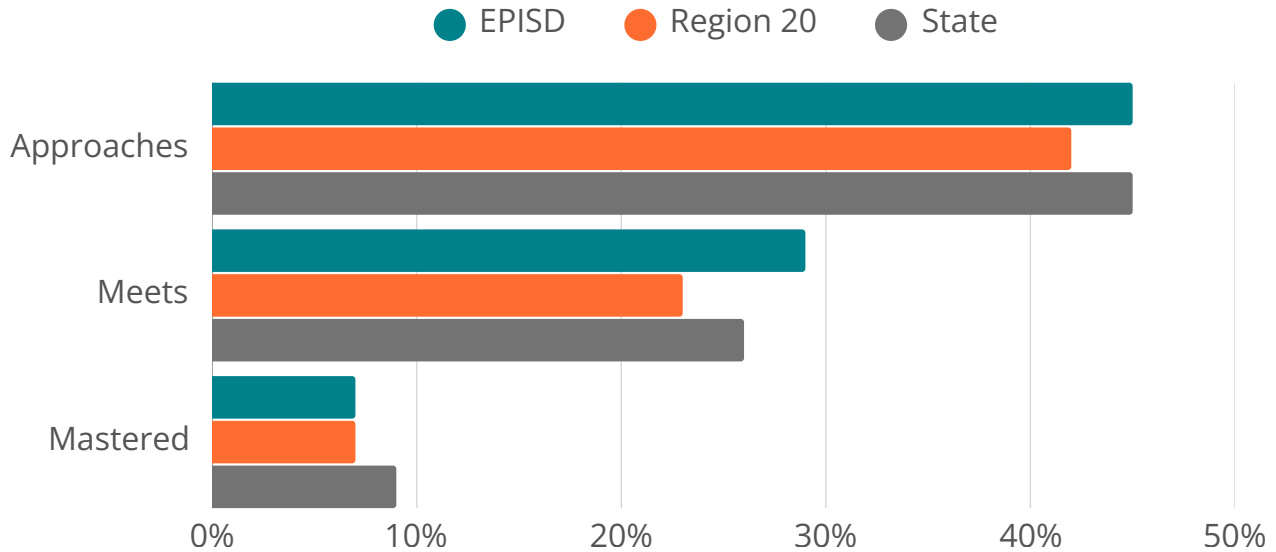
STAAR RLA Grade 8 Special Education Spring 2025



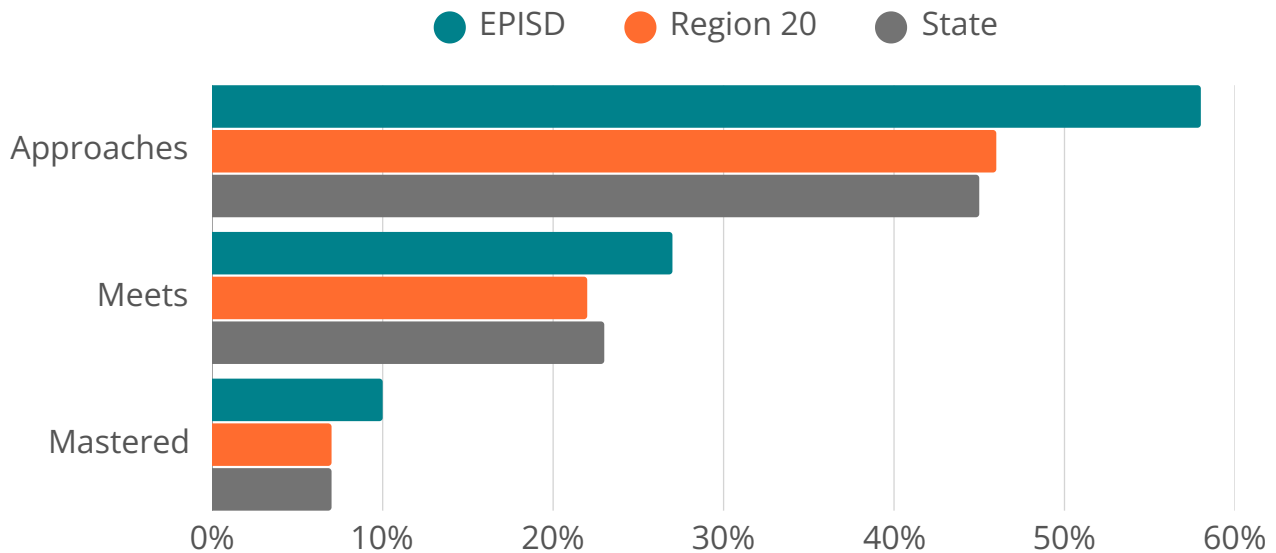
STAAR Math Grade 3 Special Education Spring 2025



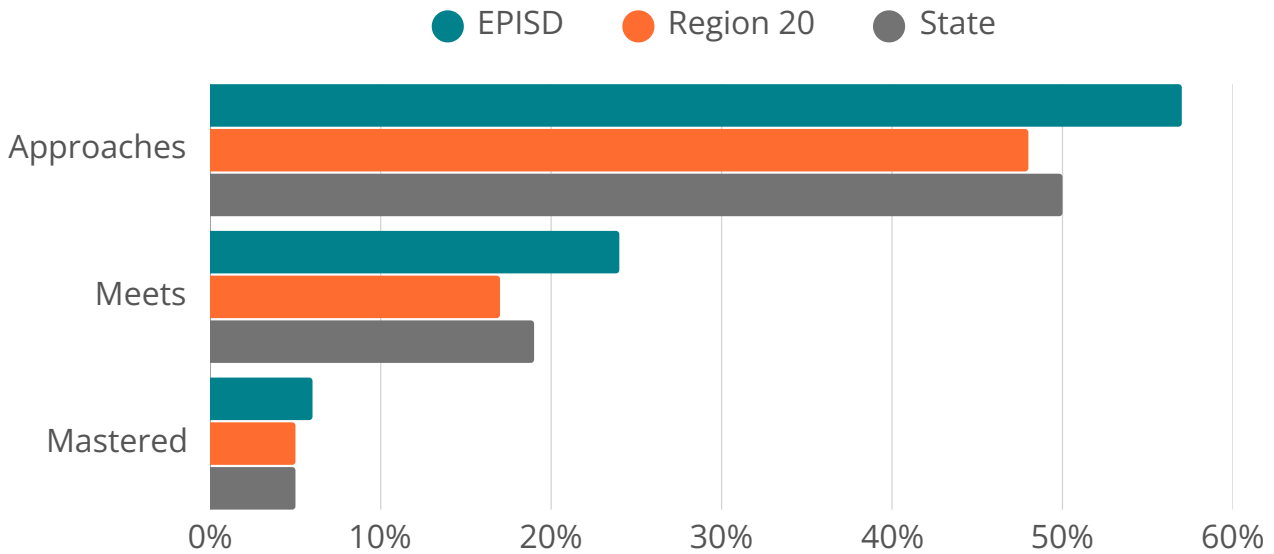
STAAR Math Grade 4 Special Education Spring 2025



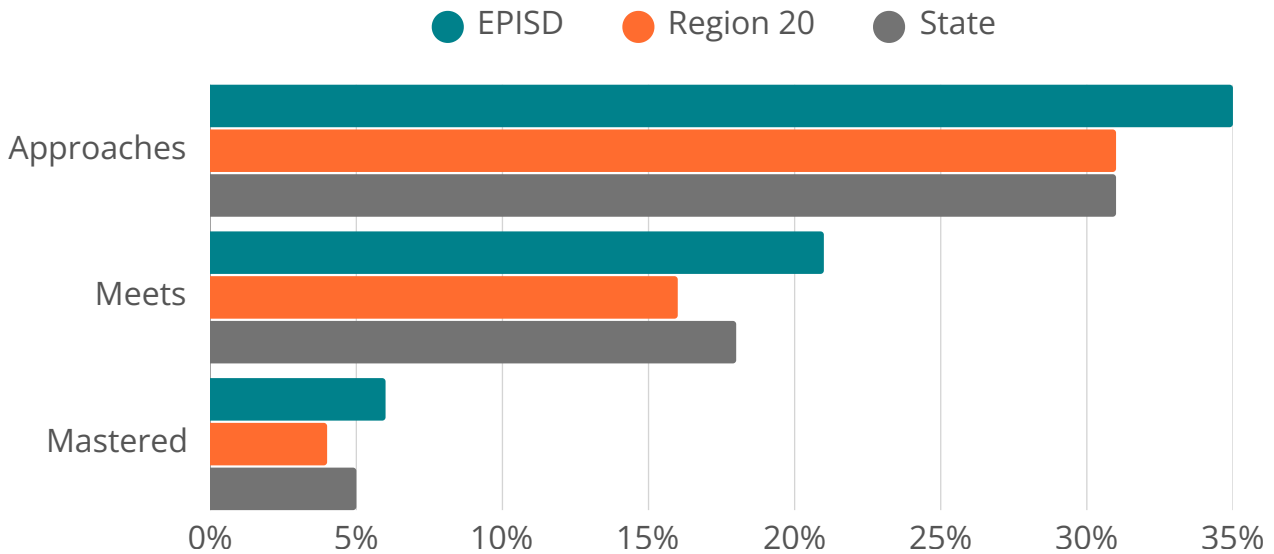
STAAR Math Grade 5 Special Education Spring 2025



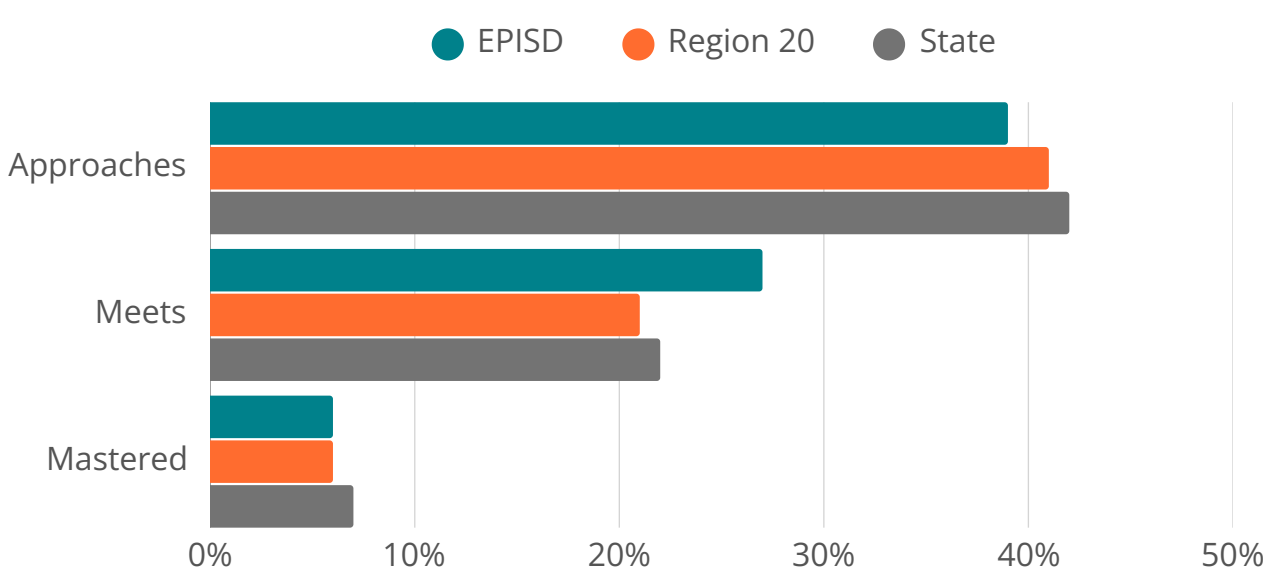
STAAR Math Grade 6 Special Education Spring 2025



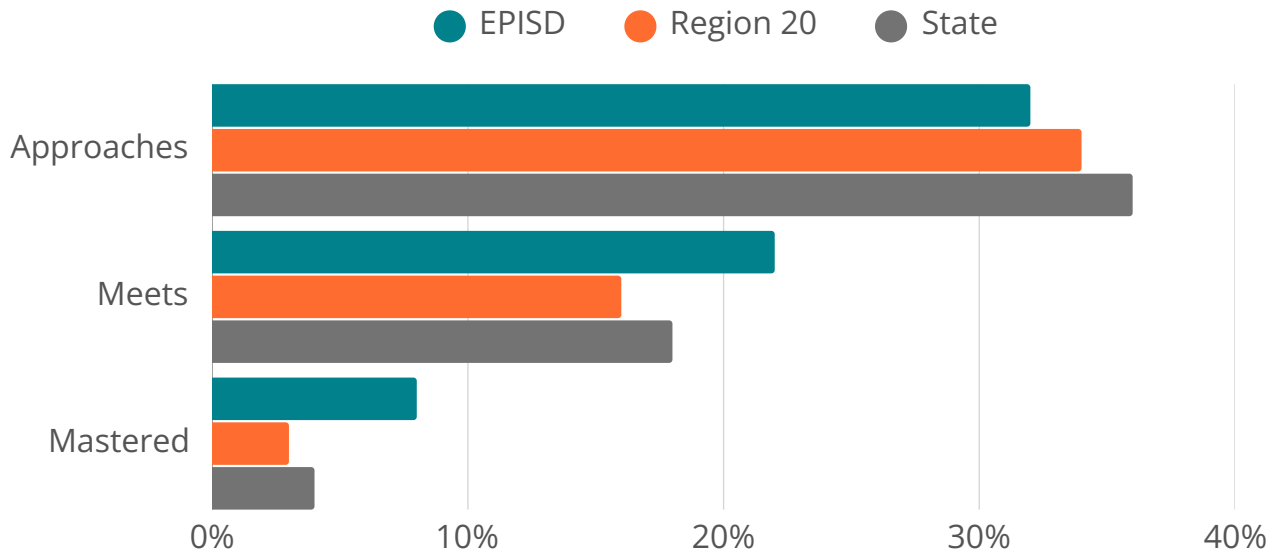
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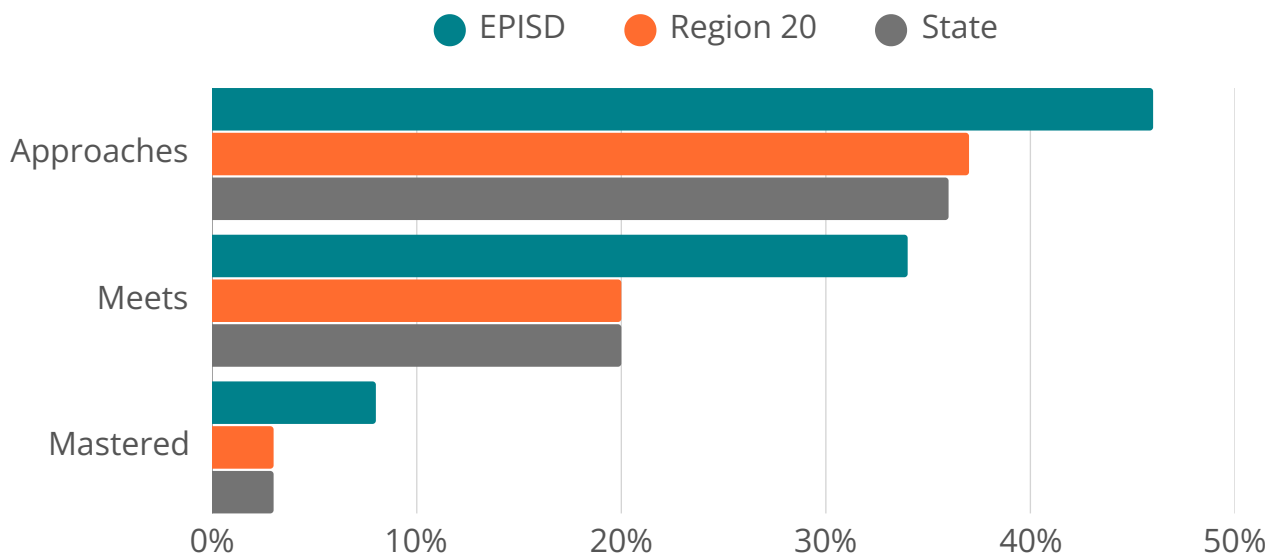
STAAR Math Grade 8 Special Education Spring 2025



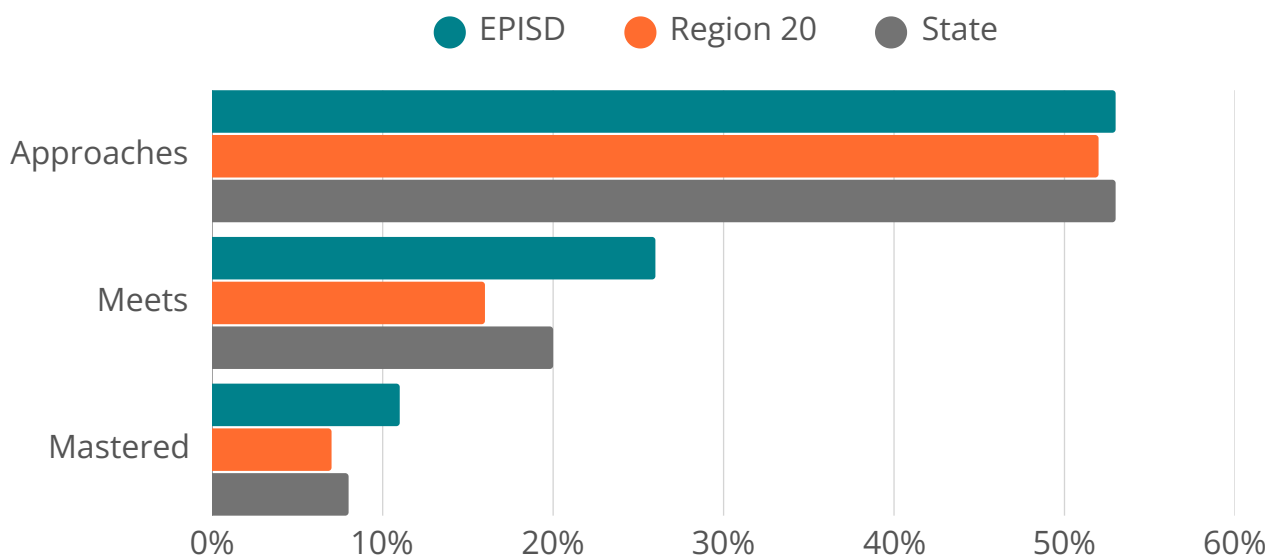
STAAR EOC English I Special Education Spring 2025



STAAR EOC English II Special Education Spring 2025



STAAR EOC Algebra I Special Education Spring 2025



Instructional arrangement information

Instructional arrangements describe the settings and methods through which students with disabilities receive special education instruction and related services. These arrangements are intended to align services to individual student needs while ensuring access to FAPE in the least restrictive environment (LRE) as required under federal and state law.

EPISD Instructional arrangement percentages	
00 Speech therapy	16.2%
40 Mainstream	12.9%
41 Resource < 21%	41.7%
42 Resource 21% < 50%	8.8%
43 Self-contained 50-60%	1.4%
44 Self-contained > 60%	13.5%
45 Full time early childhood special education (ECSE)	2.5%

2025-2026 Information provided by EPISD



A review of instructional arrangement data indicates that the largest group of students receiving special education services in EPISD is served through resource support for less than 21 percent of the instructional day. Additional students receive services through speech therapy only which typically reflects students whose primary need is speech or language support while they otherwise participate in the general education environment. A smaller portion of students receive services through mainstream support within the general education classroom while others receive support through resource services for a larger part of the instructional day.

The data also show that a notable proportion of students are served in self-contained instructional arrangements where students receive special education services for the majority of the instructional day. When compared with typical statewide service patterns, the district appears to serve a somewhat larger share of students in resource and self-contained settings and a smaller proportion through mainstream instructional arrangements within the general education classroom.

This pattern indicates that students are more frequently served in more restrictive instructional settings than is typical across the state. While these placements might be appropriate based on individual student needs, the district would benefit from periodically reviewing placement decision-making processes and campus service delivery models to ensure students are consistently considered for services in the LRE with appropriate supports in general education settings whenever possible.

Continuum of services

EPISD provides a range of special education instructional services designed to address varying levels of student need while supporting access to the general education curriculum. Services are delivered across settings and instructional models based on individual student needs as determined by the admission, review, dismissal (ARD) committee.

At the time of the review, the district did not maintain a document that clearly outlines the full continuum of special education services available to students. However, through interviews with district staff and a review of campus practices, the following descriptions summarize how services are currently implemented across the district. These descriptions reflect the service delivery models that staff reported using to support students with disabilities.

Inclusive services provide support within the general education classroom during core instruction. Services are scheduled based on individual student needs and are delivered primarily by a special education teacher with support from a paraprofessional as appropriate. Students remain responsible for mastering grade-level standards.

Speech therapy provides individualized assessment and intervention to address communication, language, articulation, and social-pragmatic needs. Services are delivered across the continuum of special education, ranging from push-in support within general education and special education settings to pull-out sessions. Students receive targeted support to access the curriculum and progress toward IEP goals.

Resource classes and content mastery serve students who require targeted and modified instruction on prerequisite skills identified through the full individual evaluation (FIE). Instruction in this setting focuses on preparing students for success with grade-level curriculum in core content areas. Resource instruction is delivered by a special education teacher and, depending on student needs, might occur for part of the instructional day at the elementary level or during full class periods at the secondary level.

Dyslexia services provide targeted assessment and intervention for students with reading difficulties including decoding, fluency, and comprehension. Services are delivered across the continuum of special education and might include in-class support or pull-out instruction as determined by the ARD committee.

Early childhood special education (ECSE) provides developmentally appropriate, individualized services for children ages three through five (prior to kindergarten) who qualify for special education. Depending on individual needs, students might receive speech therapy only, participate in a general education classroom with support, or attend a specialized classroom setting. Services are delivered by a speech-language pathologist or a certified special education teacher and supported by a paraprofessional, with frequency and duration determined by the ARD committee.

Life skills classes provide academic and functional instruction in small, structured settings for students who benefit from highly individualized supports across cognitive, developmental, and adaptive skill areas. Instruction emphasizes functional academics, independent living, social, and self-regulation skills using modified Texas Essential Knowledge and Skills (TEKS) aligned to prerequisite abilities. Services are delivered by special education teachers and paraprofessionals with individualized schedules that support access to general education settings when appropriate.

Homebound services are provided to students who, based on documentation from a licensed medical doctor, are unable to attend school for a period of time. Students receiving special education services through homebound instruction are served by a certified special education teacher in the home. The frequency and duration of services are determined by the ARD committee. Instruction supports progress in the general education curriculum and addresses IEP goals and objectives.

Residential placements are utilized when a student requires intensive, specialized services that cannot be provided within the district. Students in these settings continue to receive instruction aligned to their IEP goals and objectives as determined by the ARD committee. Educational services are delivered by certified special education teachers and paraprofessionals within the residential facility.

Transition services support students ages 18 to 22 in developing skills for life beyond high school. Through individualized instruction in employability, independent living, and social development, students gain real-world experience in classroom and community settings under the guidance of special education teachers and paraprofessionals.

Proportionate share services are provided in accordance with the Individuals with Disabilities Education Act (IDEA). The district designates a portion of its federal special education funds to provide equitable services to eligible students attending private schools within district boundaries. Currently, these services focus on speech therapy.

The continuum of services is intended to provide districts with multiple instructional options to respond to student needs in a thoughtful and responsive manner. When clearly defined and implemented consistently, this range of services supports access to instruction, promotes appropriate levels of support, and helps ensure that students receive services in the least restrictive environment.

Comparative district study

The following charts provide a comparative snapshot of EPISD and peer districts selected by the district. The data include key academic performance indicators such as state assessment outcomes, growth, graduation rates, and college, career, and military readiness (CCMR) alongside contextual demographic measures. Reviewing these indicators together supports a more complete understanding of how student outcomes relate to district composition and service needs.

2025 RDA SPED determination level	
EPISD	Meets requirements
Boerne ISD	Meets requirements
Laredo ISD	Meets requirements
Medina Valley ISD	Meets requirements
Round Rock ISD	Meets requirements
San Felipe-Del Rio CISD	Meets requirements

2024-2025 Comparative special populations data						
District	Total enrollment	% Economically disadvantaged	% Special education	% 504	% Dyslexia	% Emergent bilingual
EPISD	13,820	78.26%	15.09%	5.30%	3.48%	47.71%
Boerne ISD	11,101	18.76%	18.35%	10.42%	9.59%	7.12%
Laredo ISD	20,271	97.13%	12.52%	4.27%	4.35%	53.72%
Medina Valley ISD	9,638	53.47%	17.83%	6.92%	5.00%	8.26%
Round Rock ISD	46,954	27.08%	14.73%	8.12%	5.97%	19.42%
San Felipe-Del Rio CISD	9,767	72.17%	20.58%	7.46%	6.57%	23.65%

2024-2025 Comparative district information					
District	Rating	Approaches or above (SPED)	Annual growth (SPED)	4 Year graduate rates (SPED)	CCMR (SPED)
EPISD	B	50%	50%	81%	88.9%
Boerne ISD	A	65%	56%	93.7%	100%
Laredo ISD	B	59%	57%	87.2%	99.4%
Medina Valley ISD	B	45%	46%	83.9%	86.8%
Round Rock ISD	B	57%	25%	81.8%	86.5%
San Felipe-Del Rio CISD	C	44%	50%	85.4%	71.6%

A comparison of peer districts indicates that EPISD serves a student population with characteristics similar in some respects to other districts of comparable size, including a high percentage of economically disadvantaged students and a large population of emergent bilingual learners, though not all characteristics align across districts. These demographic factors often require districts to provide additional instructional and language supports to ensure access to the general education curriculum.

When compared with selected districts, EPISD serves a moderate proportion of students receiving special education services relative to peer districts with lower participation in Section 504 and dyslexia services than many comparison systems. These patterns might reflect differences in identification practices, intervention systems, or service delivery models across districts.

Student outcomes for students receiving special education services show generally competitive performance when compared with peer districts. The district demonstrates solid results in overall academic performance, annual growth, graduation outcomes, and college, career, and military readiness indicators.

In several areas outcomes are comparable to or stronger than districts serving similar student populations. This indicates that existing instructional systems are supporting positive student outcomes despite higher levels of economic disadvantage and linguistic diversity.

Results driven accountability

The Texas Education Agency (TEA) annually develops and implements the results driven accountability (RDA) framework at the district level. This comprehensive framework encompasses indicators for three key program areas, one of which is special education.

The domains included in the report are academic achievement, post-secondary readiness, and disproportionate analysis. Within these domains, indicators are assigned at least one performance level (PL) excluding those marked as report only. The overall determination level for EPISD for 2025 was “meets requirements.”

A review of the district's RDA data indicates that EPISD demonstrates overall strong performance and compliance with the district meeting state requirements across monitored program areas and no federally required compliance concerns identified. These results suggest that the district has established systems that support accurate data reporting and appropriate program implementation for students receiving special education services.

The data also reflect several areas of positive student outcomes including strong graduation rates and low dropout rates for students receiving special education services. Additionally, disciplinary removals that result in extended exclusion from school occur infrequently, indicating that campuses generally maintain practices that allow students to remain engaged in instruction and access school services.

While overall performance is strong, several areas present opportunities for continued improvement. Academic performance indicators suggest that access to grade-level instruction and targeted academic interventions, particularly in mathematics and English language arts, warrant continued focus to strengthen achievement outcomes. In addition, data related to inclusive instructional settings indicate that some students might spend less time in general education classrooms than expected under LRE expectations. Expanding inclusive practices and strengthening collaboration between general and special education teachers could support improved academic outcomes while increasing access to grade-level instruction.

Early childhood data also suggest an opportunity to strengthen inclusive preschool placements so that more young students with disabilities can participate in regular early childhood environments with appropriate supports. Increasing access to inclusive early learning environments can support language, social, and academic development and align with state expectations for early childhood services.

Overall, the district demonstrates a strong compliance foundation and positive student outcomes. Continued focus on inclusive service delivery, academic growth in core content areas, early childhood inclusion, and proactive behavioral supports could further strengthen outcomes for students receiving special education services while building on the district's existing strengths.

Organization of findings and recommendations

This report is organized to provide a clear, system-level review of EPISD's special education program and to support informed, compliant decision-making. Findings are grouped into four focus areas that reflect the core components of an effective and sustainable special education system. Each section is intended to stand alone while also contributing to an overall understanding of districtwide strengths, challenges, and opportunities for improvement. The four focus areas addressed in this report are:

- **Part 1: Instructional quality and program alignment:** This section examines how instructional practices and program structures support students receiving special education services. The section also considers how effectively special education and general education staff collaborate to ensure students have access to high-quality instruction and appropriate supports.
- **Part 2: Staffing and service delivery organization:** This section reviews how the district organizes personnel and services to meet student needs. It examines staffing structures, roles and responsibilities, and how special education teachers, related service providers, and paraprofessionals are deployed across campuses.
- **Part 3: Resource use and financial sustainability:** This section focuses on how the district allocates financial resources to support special education programs. It examines the use of federal, state, and local funding to ensure services are delivered efficiently and sustainably.
- **Part 4: Systems, access, and student outcomes:** This section reviews the district's systems for identifying, supporting, and monitoring students receiving special education services. It considers processes related to evaluation, eligibility determination, service access, and progress monitoring. The section also examines student outcome data to understand how effectively district systems support academic progress, graduation, and postsecondary readiness.

Within each focus area, the report presents findings that describe observed practices, trends, and system-level patterns. Commendations follow to recognize effective practices and strengths the district might sustain or build upon. Recommendations are then provided to outline targeted actions the district might consider to strengthen systems, improve instructional impact, and reduce compliance risk.



FINDINGS & RECOMMENDATIONS

Part 1: Instructional quality and program alignment

This section reviews how special education instruction is implemented across campuses and how program structures support student access to grade-level curriculum and appropriate supports. Observations, staff interviews and focus groups, and document reviews were used to understand instructional practices, service delivery models, and collaboration between general education and special education staff. The following findings highlight areas of effective practice as well as opportunities to strengthen instructional alignment, increase consistency across campuses, and expand inclusive learning opportunities for students receiving special education services.

Findings

- The district does not currently operate under a clearly defined instructional framework or standardized continuum of services. This has resulted in significant variation in how special education instruction is delivered across campuses.
- Content mastery and inclusive instructional supports are utilized at some campuses, but implementation is inconsistent. Many students receiving special education services are not served within general education classrooms which can limit shared instructional responsibility between general education and special education staff.
- The absence of a consistent service model has resulted in inconsistent instructional practices across campuses, including:
 - Resource settings being used for behavior management;
 - Resource classes functioning as temporary placements to provide general education teachers with a break; and

- Primary instruction being provided by paraprofessionals rather than certified teachers in some resource classrooms.
- Instructional quality varies across campuses. While strong teaching practices were observed in several classrooms, these practices are not consistently implemented districtwide.
- Professional learning opportunities are provided, but they are not aligned to a districtwide instructional framework or clearly defined instructional models. This approach limits their impact on improving instructional consistency.
- ECSE classrooms are more restrictive than best practice recommendations.
- The current dyslexia service delivery model might not reflect recommended intervention intensity, as some students reportedly receive dyslexia services two to three times per week.
- The 18+ transition program is not structured around best practices for postsecondary transition and instead functions primarily as a continuation of high school programming rather than emphasizing community-based instruction, employment, and independent living skills.

Commendations

- Positive student behavior and engagement were consistently observed. Students were generally respectful, engaged in learning activities, and very few discipline concerns were noted during campus visits.
- Several life skills classrooms demonstrate strong instructional practices including structured routines, individualized supports, and active student engagement.
- Across campuses, staff demonstrate strong commitment to supporting students with disabilities, even in the absence of consistent instructional frameworks and with limited staffing resources.

Recommendations

- Develop and implement a districtwide instructional framework that defines the continuum of special education services and establishes expectations for inclusive practices, resource services, and specialized instructional settings.

- Align professional learning with the district’s instructional framework so that training supports consistent implementation of instructional models and best practices. Professional learning should be differentiated to address the specific roles and learning needs of each stakeholder group, from paraprofessionals and teachers, campus administrators, to district leaders, to ensure all staff have the knowledge and skills needed to effectively support students receiving special education services.
- Increase opportunities for inclusive instruction by expanding service delivery models such as co-teaching and in-class support, allowing more students to receive services within general education classrooms when appropriate.
- The district should consider phasing out the use of content mastery as a primary instructional model for students receiving special education services. Content mastery, when used as a pull-out support separate from core instruction, is not widely supported by current evidence-based practices and limits students’ access to grade-level instruction and participation in the general education classroom.
- Clarify instructional roles and expectations to ensure that certified teachers provide instruction in resource and specialized classrooms with paraprofessionals serving in support roles.
- Review and strengthen program-specific service models including:
 - Increasing the intensity and consistency of dyslexia intervention services;
 - Expanding inclusive early childhood opportunities with appropriate teacher support; and
 - Redesigning the 18+ transition program to emphasize community-based instruction, employment preparation, and independent living skills aligned with transition best practices.

Part 2: Staffing and service delivery organization

This section reviews the staffing models and service delivery structures that support special education across the district. It examines how personnel are organized, assigned, and supported to meet instructional, evaluation, and compliance responsibilities. To provide context, the section begins with staffing data related to roles, caseloads, and service areas. The analysis, including findings, commendations, and recommendations, is informed by these data as well as staff interviews and on-site observations to support informed decision-making related to current practices and future staffing needs.

The following chart represents the number and percentage of special education teachers over time.

Teachers by program- special education			
Year	District (number)	District (percent)	State (percent)
2021-2022	59.3	7.3%	9.6%
2022-2023	50.1	6.3%	9.7%
2023-2024	47.1	5.9%	10.3%
2024-2025	50.6	6.5%	11.4%

Information from Texas Academic Performance Reports

The following chart represents the number of FTEs by district or region and position.

Percent of teachers by program- special education	
EPISD	6.5%
Boerne ISD	19.6%
Laredo ISD	9.2%
Medina Valley ISD	14.5%
Round Rock ISD	17.4%
San Felipe-Del Rio CISD	5.1%
Texas	11.4%

Information from 2024-2025 Texas Academic Performance Reports

Staff to student ratios by program						
Program By Level	Students	Teachers	TAs	Total staff	Student: teacher ratio	Student: staff ratio
Early childhood						
ECSE*	163	5	18	23	32.6	7
Elementary						
Dyslexia**	302	6	0	6	50	50
In-class support/Resource	827	14	11	25	59	33
Junior high						
Dyslexia	78	2	0	2	39	39
In-class support/Resource	270	7	8	15	39	18
Life skills	61	4	4	8	15	8
High school						
Dyslexia	5	1	0	1	5	5
In-class support/Resource	306	8	10	18	38	17
Life skills	57	5	11	16	11	4
Job training	52	2	0	2	26	26

Staffing information totals provided by EPISD. Ratio numbers are rounded to the nearest tenth for reporting purposes.

*ECSE data includes self-contained and inclusion.

**Dyslexia providers serve multiple campuses.

Staff to student ratios by campus: Early childhood						
Program by campus	Students	Teachers	TAs	Total staff	Student: teacher ratio	Student: staff ratio
ECSE Self contained						
Early Childhood Center	25	1	4	5	25	5
Kennedy Hall	45	2	6	8	22.5	5.6
Language Development Center	21	1	4	5	21	4.2
Rosita Valley Literacy Academy	23	1	3	4	23	5.8
TOTAL	114	5	14	19		
AVERAGE					22.8	5
ECSE Resource/Inclusion						
Early Childhood Center	10	*	1	1	*	10
Kennedy Hall	8	*	1	1	*	8
Language Development Center	12	*	1	1	*	12
Rosita Valley Literacy Academy	20	*	1	1	*	20
TOTAL	50	*	4	4		
AVERAGE					*	12.5

**The students who receive ECSE resource/inclusion services are case managed by the ECSE self-contained teachers*

ECSE caseloads			
Campus	Total students	Teachers	Caseload
Early Childhood Center	35	1	35
Kennedy Hall	53	2	26.5
Language Development Center	33	1	33
Rosita Valley Literacy Academy	43	1	43
TOTAL	164	5	
AVERAGE			34.38

Staff to student ratios by campus: Dyslexia		
Program by campus	Students	Teacher (allocations)
Elementary		
Rosita Valley Language Academy	0	.5
Benavides Heights	21	.33
Armando Cerna	26	.33
Ray H. Darr	11	.5
Pete Gallego	17	.5
Henry B. Gonzalez	11	.5
Nellie Mae Glass	14	.5
Graves	15	.33
Sam Houston	22	.5
Kirchner	5	1
Liberty	36	.5
Perfecto Mancha	41	.5
Rosita Valley	14	.33
San Luis	32	.33
Seco Mines	19	.5
Juan N. Seguin	16	.33
Secondary		
Eagle Pass Jr. High	31	.5
Memorial Jr. High	42	1
C. C. Winn High	3	0
Eagle Pass High	2	0
TOTAL	378	9

Staff to student ratios by campus: Life skills						
Program by campus	Students	Teachers	TAs	Total staff	Student: teacher ratio	Student: staff ratio
Elementary						
Benavides Heights	18	1	3	4	18	4.5
Armando Cerna	18	1	2	3	18	6
Nellie Mae Glass	19	1	2	3	19	6.3
Graves	18	1	3	4	18	4.5
Sam Houston	36	2	4	6	18	6
Liberty	17	1	2	3	17	5.7
Perfecto Mancha	17	1	2	3	17	5.7
San Luis	14	1	2	3	14	3.7
Seco Mines	18	1	2	3	18	6
TOTAL	175	10	22	32		
AVERAGE					17.5	5.5
Program by campus	Students	Teachers	TAs	Total staff	Student: teacher ratio	Student: staff ratio
Secondary						
Eagle Pass Jr. High	25	2	2	4	12.5	6.3
Memorial Jr. High	22	2	2	4	11	5.5
C. C. Winn High	36	2	5	7	18	5.1
Eagle Pass High	46	3	6	9	15.3	5.1
TOTAL	129	9	15	24		
AVERAGE					14.3	5.4
18+						
Program by campus	Students	Teachers	TAs	Total staff	Student: teacher ratio	Student: staff ratio
C. C. Winn High	15	1	0	1	15	15
Eagle Pass High	37	1	0	1	37	37
TOTAL	52	2	0	2		
AVERAGE					26	26

Staff to student ratios by campus: Resource & Inclusion						
Program by campus	Students	Teachers	TAs	Total staff	Student: teacher ratio	Student: staff ratio
Elementary						
Benavides Heights	50	1	1	2	50	25
Armando Cerna	80	1	1	2	80	40
Ray H. Darr	41	1	0	1	41	41
Pete Gallego	41	1	0	1	41	41
Henry B. Gonzalez	51	1.5	1	2.5	34	20.4
Nellie Mae Glass	71	1	1	2	71	35.5
Graves	74	1	1	2	74	37
Sam Houston	63	1	1	2	63	31.5
Kirchner	10	1	0	1	10	10
Liberty	67	1	1	2	67	33.5
Perfecto Mancha	91	1.5	1	2.5	60.7	36.4
Rosita Valley	50	1	0	1	50	50
San Luis	59	1	1	2	59	29.5
Seco Mines	41	1	1	2	41	20.5
Juan N. Seguin	38	1	0	1	38	38
TOTAL	827	16	10	26		
AVERAGE					52	32
Secondary						
Eagle Pass Jr. High	132	3	3	6	44	22
Memorial Jr. High	157	4	4	8	39.3	19.6
C. C. Winn High	183	5	4	9	36.6	20.3
Eagle Pass High	146	4.5	3	7.5	32.4	19.5
TOTAL	618	16.5	14	30.5		
AVERAGE					37.5	20.3

The following charts represent the number of evaluation staff reported in PEIMS.

EPISD evaluation staff				
Year	# of Students SPED	Educational diagnosticians	School psychologists	SLPs
2019-2020	1,560	8	0	12
2020-2021	1,534	8	0	12
2021-2022	1,458	8	0	12
2022-2023	1,621	8	0	12
2023-2024	1,807	9	0	12
2024-2025	2,045	9.15	0	9

Information from Texas Public Information Resource and PEIMS Standard Reports

Evaluation staff				
District	# of Students SPED	Educational diagnosticians	School psychologists	SLPs
EPISD	2,085	9.15	0	9
Boerne ISD	2,037	1	10	11.86
Laredo ISD	2,538	18	0	18
Medina Valley ISD	1,718	0	10	15.64
Round Rock ISD	6,916	25	33.02	60.93
San Felipe-Del Rio CISD	2,010	8	1	13.73

Information from Texas Public Information Resource and PEIMS Standard Reports

Findings:

- A review of staffing data and service delivery structures indicates that EPISD is significantly understaffed across multiple special education roles and program areas. Although the district continues to provide required services and maintain compliance with federal and state requirements, current staffing levels place substantial pressure on personnel responsible for instruction, evaluation, and related services.
- Instructional programs appear particularly affected. ECSE, inclusive services, resource instruction, and specialized instructional settings all operate with limited staffing relative to student needs. Teachers are responsible for serving a growing number of students while managing instructional planning, IEP implementation, progress monitoring, and extensive documentation requirements. As a result, caseloads and instructional responsibilities exceed levels that typically support strong individualized instruction, effective collaboration with general education staff, and consistent implementation of inclusive practices.
- Speech-language pathology services appear to be understaffed relative to student needs which might limit the amount of direct service time available and increase provider caseloads across campuses. Providers are responsible for overseeing therapy services and evaluation activities which can create scheduling challenges and increase workload demands.
- Educational diagnosticians appear to be serving large caseloads in order to complete full and individual initial evaluations (FIEs), reevaluations, and required participation in ARD committees. As the number of students receiving special education services has increased, the workload associated with evaluations and compliance documentation has also grown and placed additional demands on existing staff.
- Paraprofessionals are assigned across specialized programs such as life skills, ECSE, and other structured settings. However, the number of paraprofessionals appears limited in relation to program needs which can place additional instructional and supervision responsibilities on teachers serving students with more intensive support requirements.

- Limited staffing makes it more difficult to implement inclusive service models that require coordinated scheduling, co-teaching, and ongoing collaboration. As a result, campuses might rely more heavily on separate instructional settings which can reduce opportunities for students to receive services in the LRE.
- With only two central office leadership positions supporting the program, the department has limited capacity to provide regular on-site guidance, coaching, and technical assistance to campuses. As a result, campus staff might have fewer opportunities to receive direct support related to instructional practices, ARD committee processes, and program implementation.
- The limited number of central office leadership roles is consistent with a broader pattern of restricted support positions within the special education program. When combined with staffing shortages in instructional, evaluation, and related service roles, this structure places additional responsibility on campus staff and central leadership to manage operational and compliance requirements.
- The district does not currently maintain a formal staffing model to guide special education staffing allocations across campuses and programs. Without defined ratios or benchmarks tied to student needs, staffing decisions appear to be reactive, contributing to inconsistent allocations and limiting the district's ability to align personnel with program demands.

Commendations:

- Despite significant staffing limitations and the absence of a formal staffing model to guide personnel allocations, the district continues to maintain positive student outcomes.
- Special education staff demonstrate a strong commitment to meeting student needs and maintaining compliance with federal and state requirements.
- The district's ability to sustain services and maintain stable performance reflects the dedication and professionalism of its staff.
- The district benefits from strong leadership provided by the director of special education. Despite limited staffing and increasing program demands, the director demonstrates a clear commitment to supporting students with disabilities and maintaining compliance with federal and state requirements.

- The district benefits from an experienced workforce among both teachers and campus administrators with average years of experience exceeding state averages. This experience contributes to strong campus leadership and sustained relationships with students and families.

Recommendations

- Develop a formal special education staffing model. Establish clear guidelines for staffing allocations based on student enrollment, service intensity, program placement, and evaluation workload. A defined model will support consistent decision-making and help ensure campuses receive appropriate staffing support.
- Increase central office program support over time. Expanding department leadership positions and program specialist roles could strengthen consistency across campuses, improve monitoring of program implementation, and improve responsiveness to student and campus needs as demands continue to grow.
- Implement a phased staffing plan. Develop a multi-year plan that prioritizes high-need roles including special education teachers, evaluation personnel, and related service providers while aligning staffing growth with increasing student identification rates.
- Expand inclusive service capacity. As staffing capacity improves, gradually increase instructional models that support services within general education settings including co-teaching and in-class support.
- Establish routine staffing reviews. Conduct annual or semiannual reviews of caseloads, service demands, and program placements to ensure staffing allocations remain aligned with student needs and district program goals.
- Expand recruitment strategies. Consider partnerships with universities, alternative certification programs, and regional education service centers to increase the pipeline of qualified special education professionals.

Part 3: Resource use and financial sustainability

Equitable resource allocation is critical to ensuring the district can meet the needs of students with disabilities while maintaining fiscal responsibility and long term sustainability. EPISD operates within a complex funding environment shaped by federal and state formulas that do not increase proportionally with student identification or program cost growth.

Despite these constraints, the district has worked to provide strong fiscal management and maintain compliance with all major funding requirements. Continued attention to alignment between funding structures, program design, and staffing decisions will be necessary to ensure resources are used effectively to support student outcomes.

Findings

Federal and state funding trends

- EPISD's special education funding reflects consistent declines in both IDEA-B formula and preschool allocations. From fiscal year (FY) 2023–2024 to FY 2024–2025, the IDEA-B formula grant decreased by approximately \$140,350 while preschool funds saw a smaller decline. These shifts align with the state's federal funding formula which is based on a combination of fixed base-year counts and current population and poverty metrics. As a result, increases in identified students do not directly translate to higher federal entitlements which limits the district's ability to offset rising program costs.
- The recent unexpected decrease in SHARS revenue resulted in a decrease \$1.2 million in reimbursement for FY 2022-2023 to only \$300,000 in FY 2024-2025.

Federal funding trends		
Fiscal year	IDEA-B Formula	IDEA-B Preschool
2023-2024	\$2,707,308	\$31,150
2024-2025	\$2,675,650	\$31,281
2025-2026*	\$2,566,952	\$30,304

Maintenance of effort and fiscal sustainability

- The district has maintained full compliance with federal maintenance of effort (MOE) requirements, specifically under test 2, which evaluates year-to-year spending from state and local sources. Historical spending data demonstrate that EPISD consistently exceeds the required 55% threshold of state special education revenue with percentages ranging from 75% to 95% over the past four years. These levels indicate a continued commitment to funding special education above the minimum requirement even as costs and identification rates increase. The reported amounts include all fund 199 spending under program intent codes (PICs) 23, 33, and 43. However, the state's 55% spending calculation only includes PICs 23 and 33. Therefore, the actual percentage over the required 55% is likely lower than the percentages shown here.
- While MOE compliance has been consistently met, the district's special education expenditures continue to rise, primarily due to increased student identification and staffing needs. Fiscal management practices have remained sound, and the district has managed to decrease the percentage spent as the allotment has grown with the increased number of student placements. The district's FY 2024–2025 spending of \$10.9 million will serve as the baseline for FY 2025–2026 compliance.
- MOE must be reviewed and managed, but the ability to provide FAPE for students with disabilities drives decisions regarding programming, and the finance department has safeguards in place.

- Additional factors contributing to long-term fiscal strain include legislated salary increases, the reclassification of dyslexia-related costs under special education budgets, and the potential for additional staff hires. Each of these elements could elevate the district's MOE baseline and create sustainability challenges if revenue growth does not keep pace.

State revenue and expenditures			
Fiscal Year	State special education revenue	District special education expenditures	Percentage of state revenue spent (55% required)
2021-2022	\$9,864,577	\$9,404,050	95.3%
2022-2023	\$10,859,682	\$10,106,638	93.1%
2023-2024	\$12,570,946	\$10,426,166	82.9%
2024-2025	\$14,579,193	\$10,958,522	75.2%
2025-2026	\$15,684,340*	\$11,276,121**	71.9%

* This is from preliminary summary of finance report dated March 13, 2026 and could increase as the year progresses.

**Projected expenditures for current FY.

Dyslexia and related funding

- The district's state dyslexia allotment has steadily increased, reflecting the growing number of identified students. Allotments rose from \$261,184 in FY 2021–2022 to a preliminary \$371,036 in FY 2025–2026 which represents a significant upward trend. This growth provides additional state funding but also elevates the district's MOE obligation once dyslexia-related expenditures are coded under special education. While beneficial for supporting students, this shift requires careful fiscal monitoring to ensure compliance and sustainability.
- Additionally, the newly implemented \$1,000 per initial special education evaluation funding provides limited relief. Although EPISD is projected to receive approximately \$542,000, this revenue source does not fully cover the actual cost of conducting evaluations. This preliminary projection is based on the number of evaluations conducted in 2024-2025 and will be adjusted based on the number of initial evaluations completed in 2025-2026. Its unpredictability and lack of historical data limit its reliability for long-term fiscal planning.

State dyslexia funding	
Fiscal year	Dyslexia allotment
2021-2022	\$261,184
2022-2023	\$299,992
2023-2024	\$328,328
2024-2025	\$349,272
2025-2026	\$371,036*

** This is from preliminary summary of finance report dated March 13, 2026 and should increase as the year progresses.*

Proportionate share and private school services

- A review of proportionate share spending indicates the need for continued oversight of private and homeschool service allocations. Current expenditures should be closely monitored to ensure the district is not exceeding the required set-aside amounts for these services. Maintaining clear documentation of current-year and carry-forward funds is essential to prevent lapses and ensure compliance with IDEA-B guidelines. Establishing distinct budget lines for current and prior-year proportionate share funds enhances transparency and tracking.

Commendations

- The district demonstrates strong, collaborative relationships between the finance and special education departments. Communication is open and solution-oriented which reflects shared commitment to fiscal responsibility and student success.
- Processes for purchasing are clearly defined with established signature paths and procedures for submission, review, and approval. These well-structured systems promote accountability in financial operations related to special education.

- Manuals for processes and procedures, strong processes for position control and staffing ratios, and hiring priority for special education positions all indicate clear prioritization and strong financial practices.
- Any personnel who have other duties outside of special education are funded according to the appropriate percentage indicated in the master schedule and are regularly monitored.
- Finance staff show a high level of dedication to supporting program staff in meeting the needs of students with disabilities. Their responsiveness and willingness to problem-solve help ensure that financial processes align with program goals and facilitate timely access to necessary resources and services.

Recommendations

Federal and state funding trends

- Continue to monitor IDEA-B formula and preschool funding trends and plan budgets conservatively, anticipating modest annual fluctuations in allocations.
- Use multi-year financial projections to align spending priorities with expected funding levels, accounting for potential declines in federal or state revenue.
- Provide annual training for finance and special education administrators to review updates in funding formulas, entitlement calculations, and reporting requirements.
- To maximize SHARS revenue, the district should review which salaries are being paid from the federal grant. If possible, salaries of special education staff and teachers who provide billable SHARS services should be paid from 199 funds. Diagnosticians are a group that could be paid from the federal grant without impacting the cost report recoupment. If federal funds are needed to fund teacher salaries, prioritize those who are providing in-class support which are typically not billing for SHARS reimbursement. Another suggestion is to pay any associated Regional Day School Program for the Deaf costs, which are non-billable, to the federal grant.

Maintenance of effort and fiscal sustainability

- The district's 2024-2025 special education expenditures were \$10.9 million and that amount should serve as the baseline for maintaining MOE compliance in 2025–2026. Any spending above this level should be offset by coding an equivalent amount of existing special education expenditures to SHARS revenue using a designated sub-object code. This approach prevents increases to the future MOE threshold while maintaining compliance. Given current uncertainties in state and federal funding, legislated salary increases, and the shift of dyslexia expenses to special education budgets, applying SHARS revenue strategically will help the district sustain funding levels and avoid setting an unsustainable MOE benchmark. Additionally, any future staffing additions should be closely monitored, as they will further increase the MOE threshold.
- Evaluate and document program efficiencies to ensure that decisions are driven by student needs and programming priorities, not solely by compliance targets.

Dyslexia allotment and related funding

- Continue to track dyslexia allotments and ensure that expenses coded to special education are reviewed for accuracy and necessity.
- Incorporate dyslexia expenditures into the broader MOE planning process to mitigate unanticipated threshold increases.
- Analyze the use of dyslexia funds to ensure they are targeted toward evidence-based instruction and intervention to maintain both compliance and program integrity.
- Track the actual cost of initial evaluations and compare them with the \$1,000 per-evaluation revenue to inform future staffing and budgeting decisions.
- With the delay of final state allocations in final summary of finance reports, the district should also monitor closely the actual number of completed initial evaluations in order to minimize impacts of higher or lower numbers compared to the projected amount.

Proportionate share and private school services

- Continue to monitor proportionate share spending to confirm the district is not exceeding required set-aside amounts.
- Create separate budget lines for current-year and carry-forward proportionate share funds to simplify tracking and ensure compliance.
- Continue using contracted services for private and homeschool students to streamline documentation and clarify expenditures related to the proportionate share requirement.

Fiscal and personnel oversight

- To maximize potential SHARS reimbursement, positions and salaries should be reviewed to move as many billing positions as possible to state/local funding and moving positions that do not bill to federal funding.
- To financially protect the district, all service contracts should include a termination clause of 30 days or less. This allows contracts to be ended promptly when qualified staff are hired, preventing unnecessary expenditures.
- To further maximize funding for ECSE services, the district should consider expanding inclusive settings by utilizing dually certified teachers or implementing collaborative teaching teams that include both special education and general education teachers. This approach not only optimizes funding but also significantly supports instructional quality. Existing ECSE classes are currently 3.5 hours for the morning and afternoon programs which only generate half-day funding. Expanding each program by 30 minutes to four hours will generate full day funding for those services. The district might seek additional guidance or technical assistance as needed.
- Continue to foster collaboration between finance and program staff using shared data and fiscal reporting to make informed, student-centered financial decisions.
- Increasing inclusive practices can positively impact the district's budget by aligning service delivery with funding structures that generate higher levels of state reimbursement. When students with disabilities are served in general education settings the district can often access full-day ADA funding and reduce the need for separate, higher-cost specialized placements. This approach not only supports improved student outcomes through inclusion but also maximizes the efficient use of existing resources and promotes long-term fiscal sustainability.

Part 4: Systems, access, and student outcomes

Effective systems help ensure that students with disabilities receive timely services and have opportunities to achieve positive academic, behavioral, and postsecondary outcomes. This section examines districtwide structures that affect student access including referral and evaluation processes, the continuum of services, behavioral supports, scheduling practices, and coordination among departments. The findings identify areas of system strength, particularly in compliance and the implementation of multi-tiered systems of support (MTSS), while also highlighting opportunities to support equitable access and improved student outcomes.

Findings

- The district demonstrates a strong culture and positive campus climate. Students were observed to be respectful, engaged, and well managed. Established routines and effective classroom management practices contribute to stable learning environments across campuses.
- Campus leadership plays a significant role in program implementation. The quality and effectiveness of special education programming often depend on the capacity and priorities of the individual campus principal. As a result, service delivery and inclusive practices vary across campuses.
- Limited central office capacity restricts systemwide monitoring and support. Given the size of the district and the limited staffing within the central special education department, campuses operate with a high level of autonomy. While principals take responsibility for program implementation, there is limited ongoing monitoring, coaching, or systemwide guidance to ensure consistent practices across the district.
- The absence of a clearly defined districtwide service delivery framework contributes to variation in how inclusive practices are implemented. Without clear expectations for service models and placement decisions, campuses might rely more heavily on separate instructional settings which can reduce opportunities for students to receive services within general education environments.

- MTSS implementation is inconsistent across campuses. While some campuses demonstrate effective use of MTSS to support early intervention and prevent unnecessary referrals, other campuses show limited or inconsistent implementation of the framework.
- There were reports of students receiving abbreviated school days which indicates the need for additional review to ensure scheduling practices align with federal and state expectations regarding access to the full instructional day.
- PEIMS coding practices related to the 18+ transition program require review. Students in the transition program appear to be coded under instructional arrangement code 08 (Vocational Adjustment Class (VAC)); however, the program structure described does not consistently reflect the requirements associated with this code. VAC coding requires students to participate in a job placement with direct involvement from special education personnel.
- Overall, the district benefits from a strong sense of community and shared responsibility with staff expressing a deep commitment to supporting students and families. This community culture contributes positively to student behavior, campus climate, and staff dedication to serving students with disabilities.

Commendations

- Staff across campuses demonstrate a strong sense of responsibility for students and families. This reflects the close-knit nature of the community and contributing to a positive school climate.
- Observations indicate that students are generally respectful, engaged, and well supported through established classroom routines and effective behavior management practices.
- Principals take an active role in ensuring special education services are implemented on their campuses and demonstrate a strong commitment to meeting student needs.

Recommendations

- Develop a districtwide framework for inclusive practices. Establish clear expectations for service delivery models and the continuum of services to ensure students are consistently considered for placement in the LRE across campuses.
- Strengthen central office support and monitoring systems by clarifying roles, standardizing expectations, and using existing structures to increase oversight. Establish routine data reviews, develop clear implementation checklists for campuses, and use scheduled leadership meetings to monitor compliance and progress. Central office staff can also embed coaching and technical assistance into existing campus visits, principal meetings, and professional learning communities to reinforce expectations and support consistent implementation of special education practices across the district.
- Improve the consistency of MTSS implementation by providing clearer district guidance and leveraging existing professional learning opportunities. Develop a common MTSS framework with defined procedures for Tier 1, Tier 2, and Tier 3 supports, standardized documentation, and clear decision rules for movement between tiers and referrals. Use current training days, campus leadership meetings, and instructional coaching structures to build staff understanding of MTSS processes and expectations so that all campuses apply early intervention and referral practices consistently.
- Review scheduling practices to ensure full-day access. Conduct a review of abbreviated school day practices to ensure they align with legal requirements and that students have access to the full instructional day whenever appropriate.
- Review PEIMS coding and transition program structure. Ensure that students participating in the 18+ transition program are coded appropriately and that program design reflects best practices in community-based instruction, employment preparation, and independent living skills.

Folder review summary

IEPs serve as the foundation for special education service delivery and guide placement, and support decisions for students with disabilities. High-quality IEPs require collaborative development, clear documentation, and consistent alignment to federal and state requirements to ensure students receive FAPE and meaningful access to the general curriculum. The accuracy and completeness of IEP documentation directly influence implementation fidelity and student progress.

A comprehensive review of IEP folders within EPISD was conducted to identify areas of strength and areas for growth. The review involved the thorough examination of 15 randomly selected IEP folders, with the evaluator addressing 113 distinct items for each folder. Prior to commencing the review process, the district ensured compliance with confidentiality protocols, facilitating the evaluator's access to online records for evaluation purposes.

Student records

A review of student records identified several concerns related to document management and record keeping practices at the campus level including missing required documentation and incomplete archiving of evaluation and consent records within the student information system.

- There are concerns regarding incomplete document archiving within student records. In several instances, required documentation was not stored in the student's electronic folder. For example, a review of existing evaluation data (REED) that had reportedly been accepted by the ARD committee during the two most recent evaluation cycles was not archived. The only indication that the REED might have occurred was referenced dates within IEP documents.
- Additionally, notice and consent for evaluation documents were missing in multiple student records. When these screens were accessed, the dates listed did not align with the timelines of the completed evaluations. The review also identified several evaluations and IEP documents that remained in draft status for extended periods including some associated with meetings that occurred several months earlier. These documentation gaps might create challenges in verifying compliance with required evaluation and consent procedures.

Evaluations

A review of evaluation documentation was conducted to determine whether assessment practices, timelines, and reporting align with federal and state requirements and provide sufficient information to support eligibility determination and instructional planning for students receiving special education services.

- FIEs were generally completed within the required 45-day timeline following receipt of consent.
- Most REEDs were conducted on a three-year cycle and included input from a multidisciplinary team. However, when additional testing was not recommended, the REED documentation included limited reference to information from prior evaluations. This required reviewers to locate previous FIEs to confirm eligibility information, and in some cases those prior evaluations were not archived in the system.
- FIEs included information from multiple sources to gather relevant functional, developmental, and academic data which supported the identification of student needs and the determination of special education and related services.
- Although FIEs and REEDs included summaries of evaluation findings, many reports did not clearly describe how the identified disability impacts the student's ability to access and progress in the general education curriculum.

IEP development

A review of IEP development was conducted to determine whether ARD committee decisions, documentation practices, and program components align with federal and state requirements and support the development of meaningful, measurable plans that guide instruction and services for students receiving special education.

- Not all annual ARD committee meetings were conducted within one calendar year of the previous IEP. In one instance, the ARD remained in draft status even though the meeting had reportedly occurred several months earlier.
- ARD committees consistently considered the need for extended school year (ESY) services during annual reviews.

- Many present levels of academic achievement and functional performance (PLAAFP) statements lacked sufficient detail describing the student's strengths and areas of need in relation to progress in the general curriculum.
- Several PLAAFPs did not include a clear impact statement explaining how the disability affects the student's ability to access the curriculum as required under 34 CFR 300.320(a)(1). Baseline data was also frequently absent, limiting the ARD committee's ability to develop appropriate annual goals and measure progress.
- Most annual goals were written as broad statements and were not measurable or aligned to a standards-based format. In several cases, goals did not clearly align with the needs identified in the PLAAFP.
- For some students with a personal care supplement, the documented minutes suggested that personal care was provided throughout the entire school day. This level of support is typically reserved for students with significant needs who require continuous one-to-one assistance. Additional training could help staff accurately complete personal care documentation.
- In several cases, the instructional arrangement (IA) did not align with the services documented in the ARD. Because IA determines special education funding, accurate coding is essential.
 - Particular attention should be given to students coded under VAC, as this code requires the student to be placed in a job setting with direct involvement from special education personnel. Some IEPs reviewed did not document services consistent with this requirement.

Properly constituted ARD committees

A review of ARD committee composition and participation was conducted to determine whether meetings included all required members and were convened in accordance with federal and state requirements and for informed decision-making for students receiving special education services.

- Parents were generally present for ARD meetings, or multiple documented attempts were made to secure their participation.
- Many ARD meetings were not fully constituted according to 19 TAC 89.1050. In several cases, required members were absent and written consent for excusal was not documented as required by 34 CFR 300.321(e)(2). ARD committees must include an individual who can interpret the instructional implications of

evaluation results. Acceptable roles include the local education agency (LEA) representative, general education teacher, special education teacher, licensed specialist in school psychology (LSSP) or educational diagnostician, ARD facilitator, or speech-language pathologist. In some cases, individuals may serve in more than one role.

- Some ARDs included the SB89 supplement which is no longer applicable and should not be included in current ARD documentation.
- ARD committees should not accept substitute assessment scores for high school students prior to the administration of the EOC assessment. Decisions regarding alternative scores may only be made after the student has taken the assessment and results have been received.

Recommendations

To strengthen documentation practices and ensure compliance, the district could benefit from implementing a structured internal review process for evaluation and ARD documents.

- Utilize the TEA external desk review rubric as a training and monitoring tool for cyclical folder reviews. Randomly selected student records can be reviewed using this rubric to identify compliance concerns and training needs.
- Provide targeted professional development on PLAAFP development and measurable annual goals. Using TEA's IEP quality and rigor rubric can support staff in improving the alignment between PLAAFP statements, annual goals, and instructional planning.

Board policy

Board policy impacts special education services, as it outlines the district's commitment to providing services and support to students with disabilities. Policies set the framework for program implementation, development of IEPs, provision of related services, and accommodations for students with disabilities.

EPISD has nine prominent board policies concerning special education services. These policies are categorized into "legal" policies or "local" policies. Legal policies integrate elements of federal law, state law, and legal precedents. Local policies reflect any policies officially adopted by the EPISD board.

Locally established board policies pertaining to special education services or students are denoted below underneath the relevant legal policy. It is essential to note that all pertinent board policies, including those addressing special education services, are readily accessible within the online board policy manual posted on the district's webpage.

- **EHBA (legal)** outlines the delivery of services to individuals in special education and encompasses various aspects including nondiscrimination, the provision of FAPE, the principle of LRE, disciplinary measures, instructional configurations and settings, alternative program options, shared service arrangements, definitions pertaining to related services, and the provision of extended school year services.
- **EEH (local)** addresses students who require homebound instruction.
- **EHBAA (legal)** delineates the district's prerequisites concerning the identification, assessment, and eligibility determination of all children domiciled within the district, regardless of the extent of their disabilities, who require special education and associated services.
- **EHBAB (legal)** mandates the establishment of the ARD committee as well as the formulation of IEPs.
- **EBBAC (legal)** addresses the provision of services to special education students in non-district placements.
- **EBBAD (legal)** defines transition services and the requirements for individualized transition planning.

- **EHBAE (legal)** requires the district to institute and uphold procedures designed to guarantee that children with disabilities and their parents are afforded procedural safeguards concerning the provision of FAPE.
- **EHBAF (legal)** outlines the policy governing the video and audio monitoring of special education students. It explicitly stipulates that parental consent is not a prerequisite when employing video recordings or voice recordings for purposes directly linked to the advancement of student safety.
- **EHBAF (local)** describes district specific implementation of EHBH (legal).
- **EHBH (legal)** outlines the requirements under TEC 29.303 for students who are deaf or hard of hearing.
- **FOF (legal)** pertains to matters concerning disciplinary actions and placement in a disciplinary alternative education placement (DAEP) specifically for students with disabilities.

These board policies provide EPISD a foundation of governance with clear directives and procedures to ensure the district remains compliant with state and federal regulations. More importantly, the policies address the unique needs and priorities of the local community. The students, staff, families, and broader community of EPISD are provided transparent decision-making with the established board policy.

SURVEY DATA

Staff survey

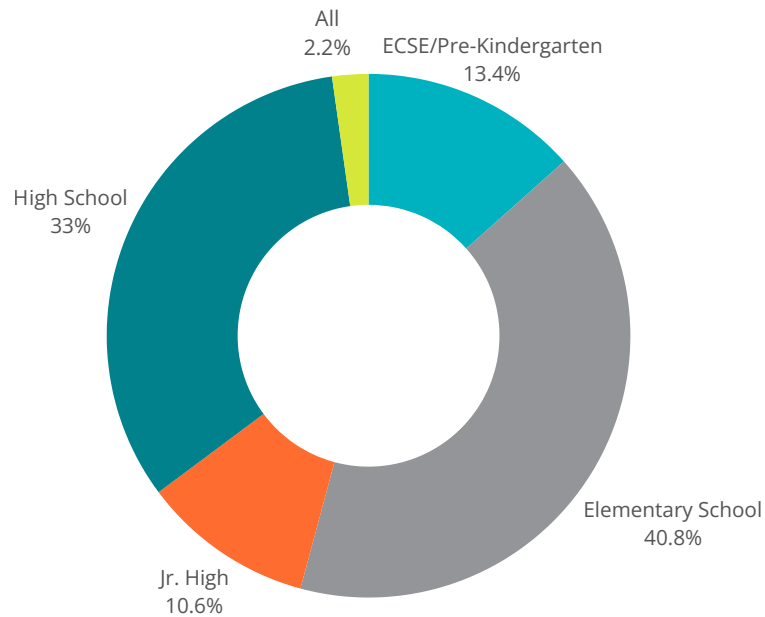
EPISD distributed a survey to district staff. The survey, developed by TCASE Services by Design, received **180** responses.

All staff were invited to complete a survey that included 17 Likert scale questions and four open-ended responses. The topics covered by the survey questions included effectiveness of the referral process, satisfaction of training provided, collaboration between educators, and effectiveness of services.

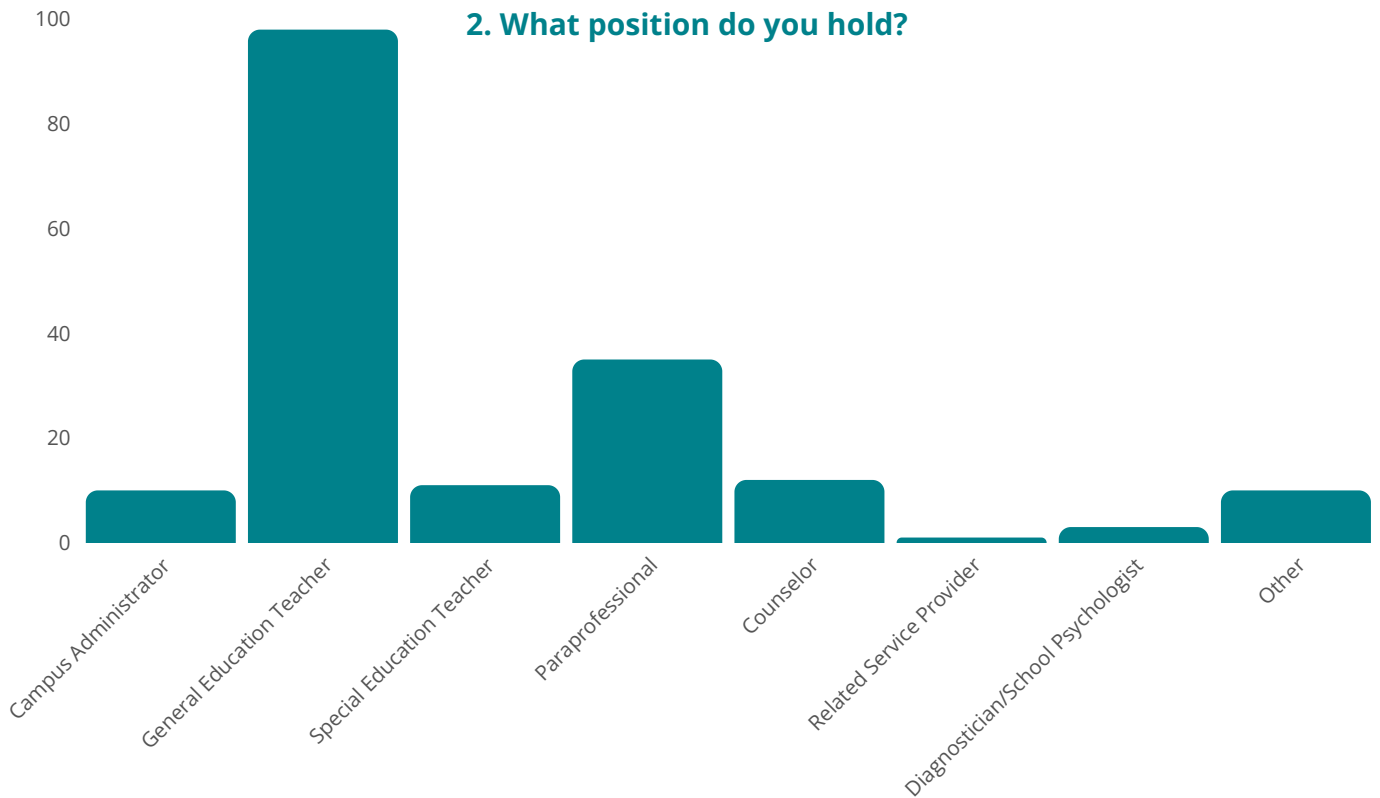
Number of responses by grade band	
Early Childhood	24
Elementary	74
Junior High	19
High	59
All levels	4

Number of responses by role	
Campus administrators	10
General education teachers	98
Special education teachers	11
Paraprofessionals	35
Diagnosticians/School psychologists	3
Speech language pathologists	0
Related service personnel	1
Counselors	12
Other	10

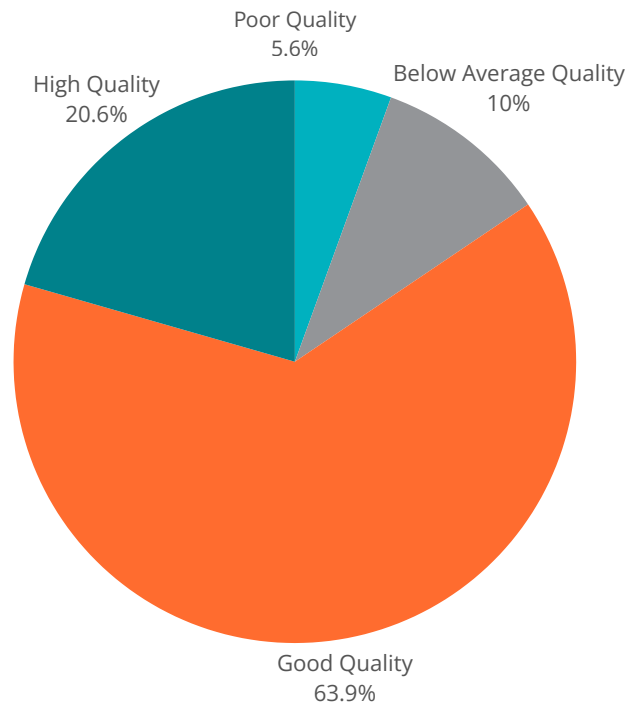
1. At which level do you serve?



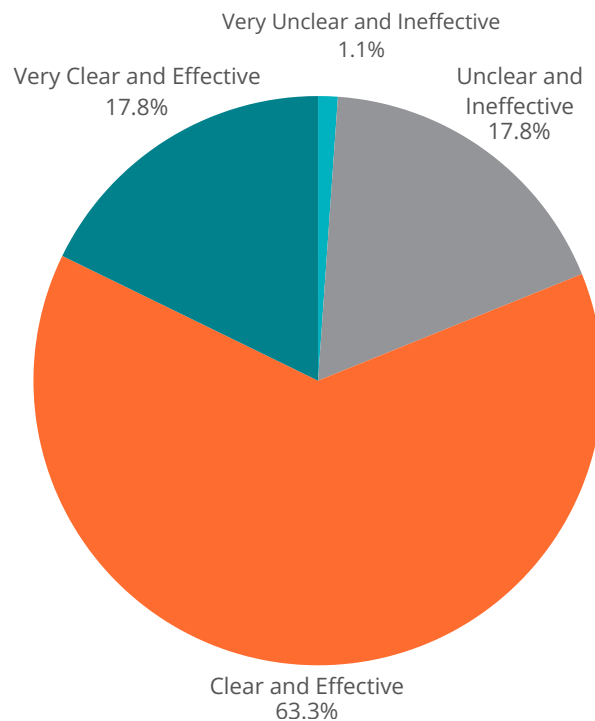
2. What position do you hold?



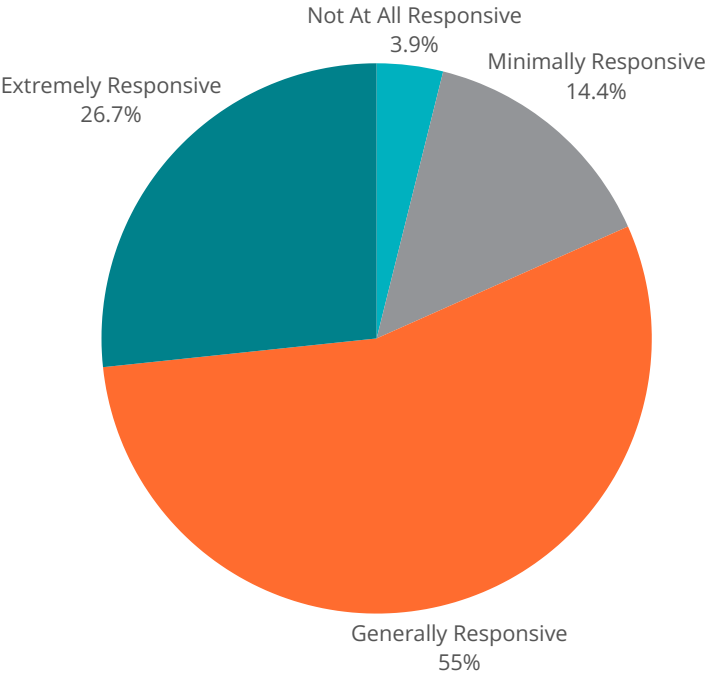
3. How would you rate the special education services the district offers to students with disabilities?



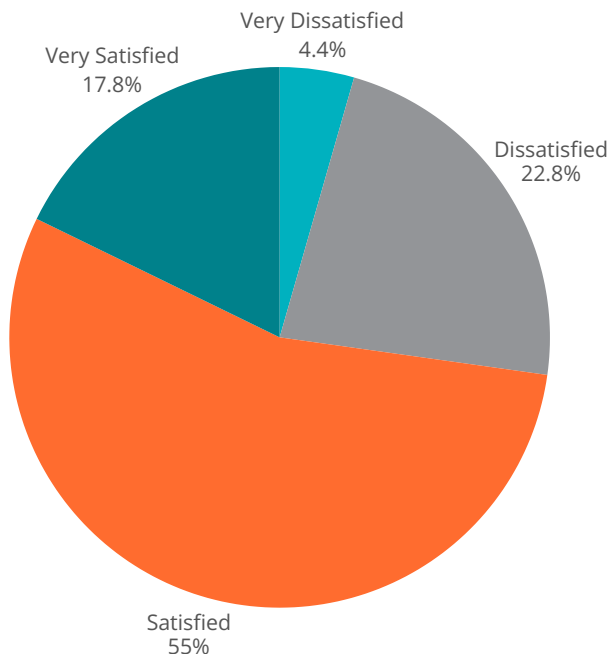
4. How would you rate the clarity and effectiveness of the special education referral process?



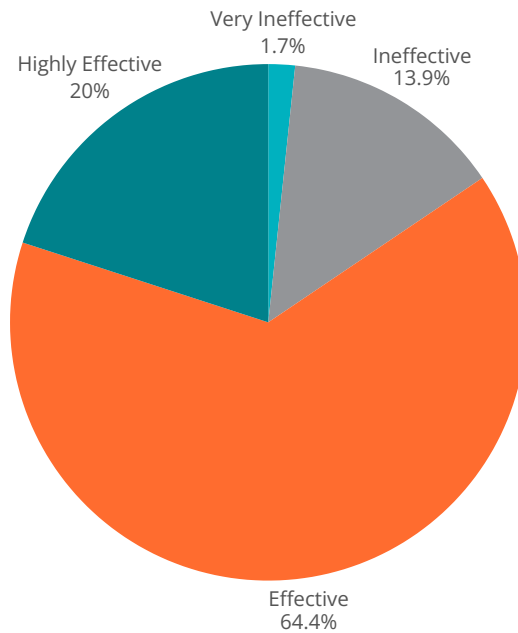
5. Please rate your experience with the district's responsiveness to the needs of special education teachers and students.



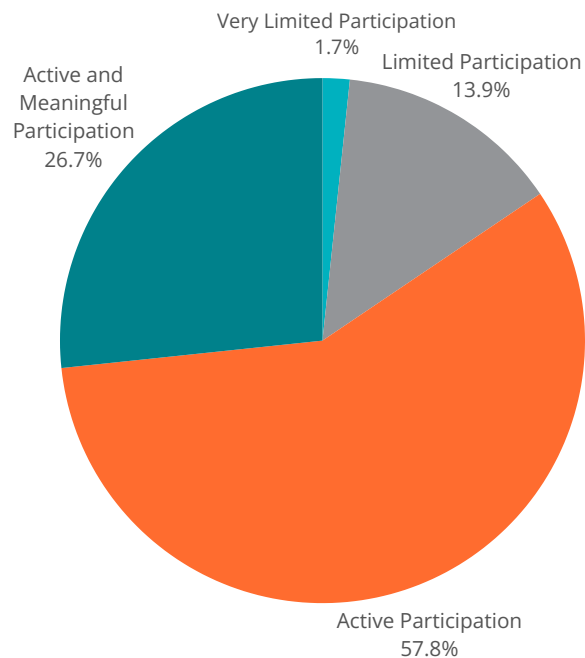
6. How satisfied are you with the quality of and access to training and professional development provided by the district to support special education teachers and staff?



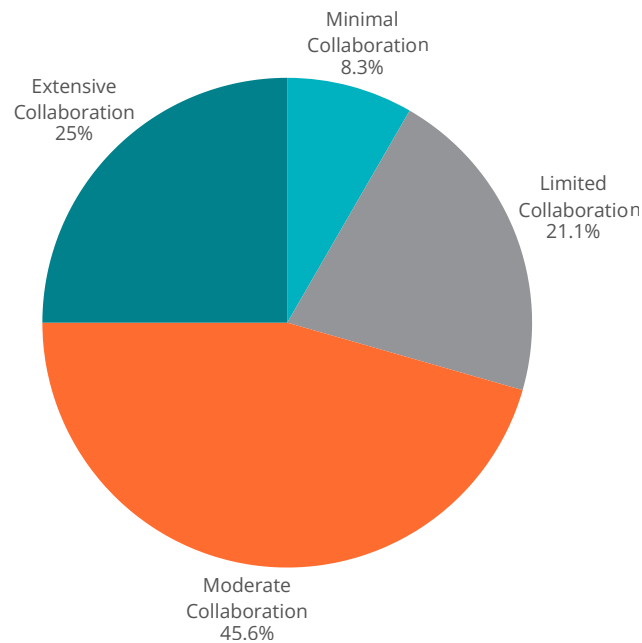
7. How effective is the current continuum of services and the range of options which serve students with disabilities?



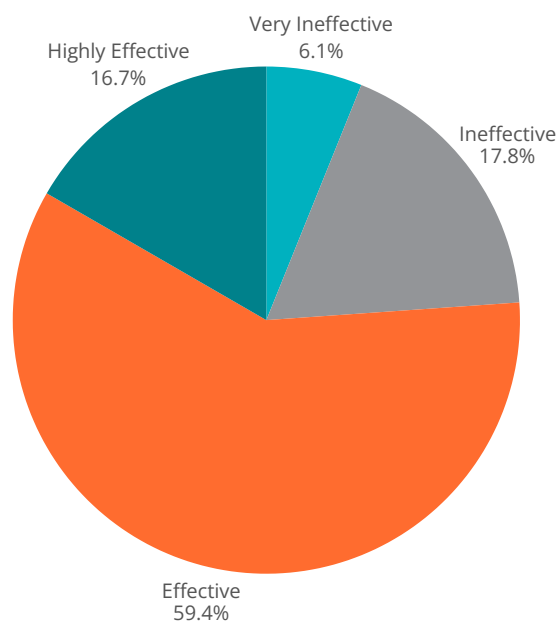
8. To what extent do you believe students with disabilities are actively participating in the general education curriculum?



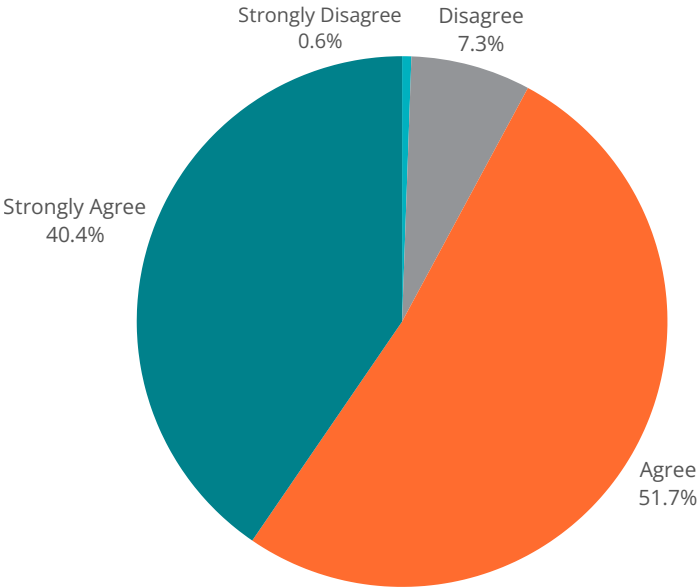
9. To what extent do general and special education teachers collaborate and share responsibility for developing lesson plans, discussing and implementing accommodations and modifications, and differentiating instruction to ensure the individualized needs of students with disabilities are effectively met?



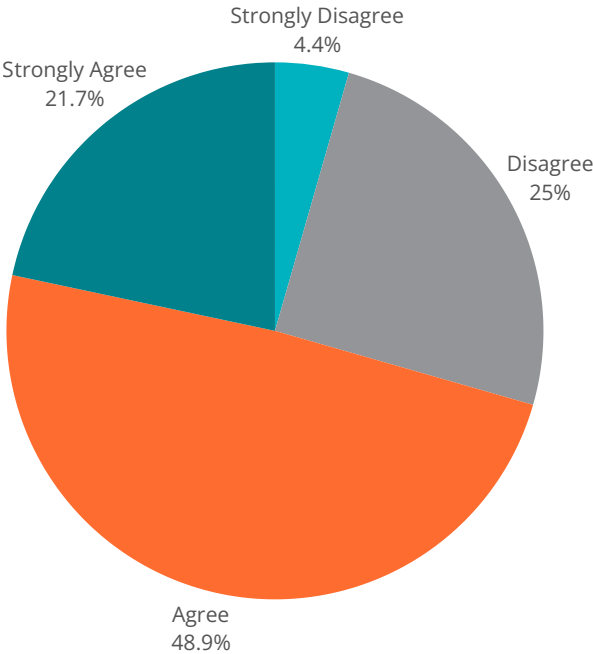
10. What is your opinion of the effectiveness of the district's MTSS (Multi-Tiered Systems of Supports) processes in meeting the academic and behavioral needs of students?



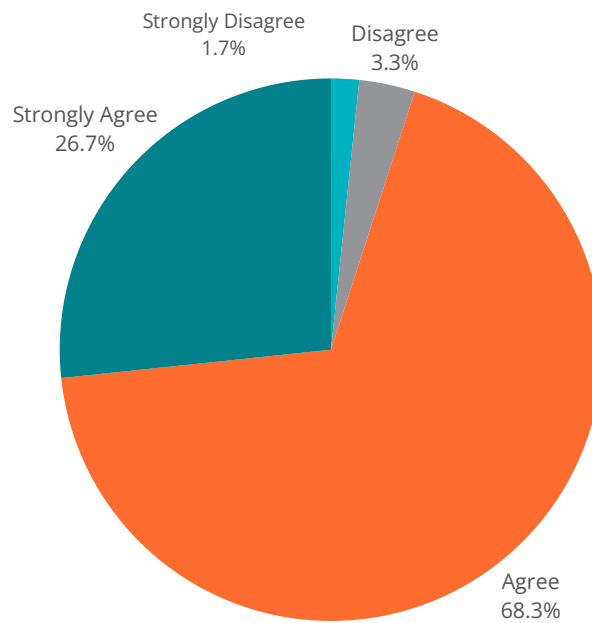
11. The faculty feels a sense of responsibility for all students, including students with disabilities.



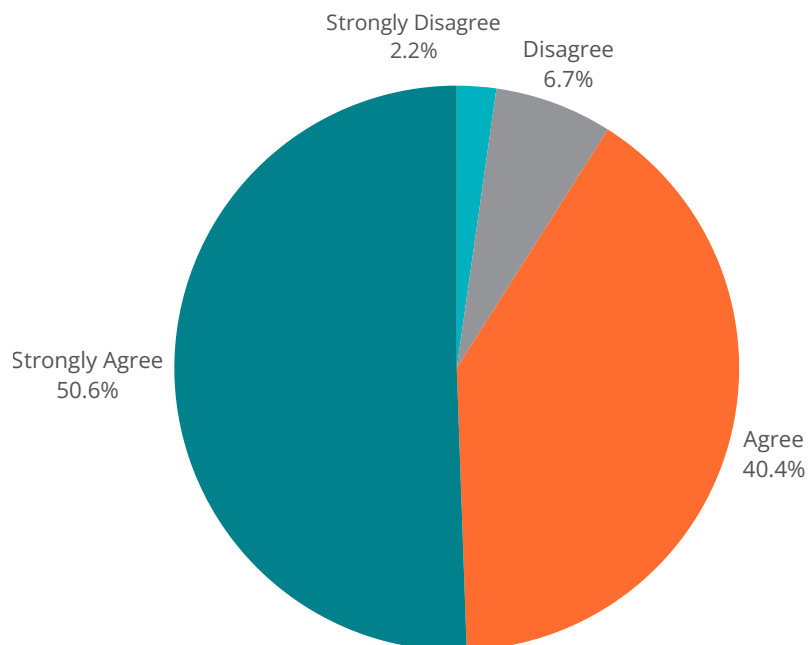
12. We have adequate resources to serve our students with disabilities.



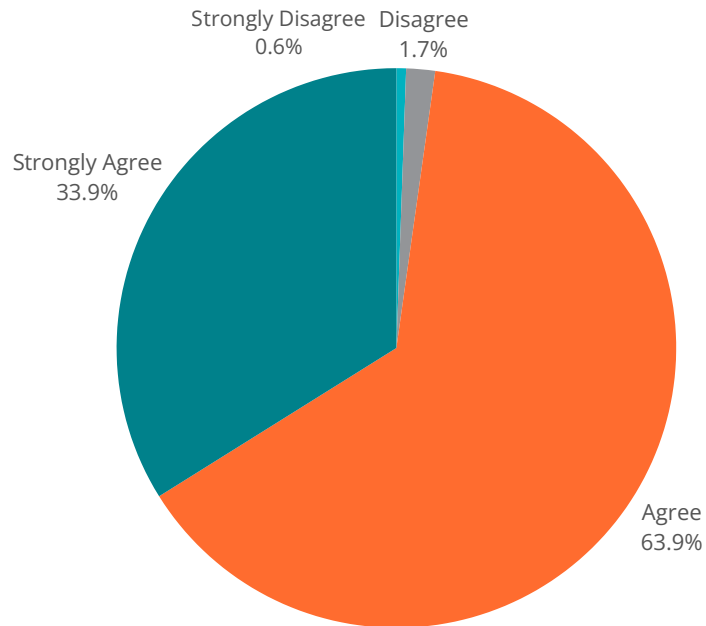
13. The general education curriculum is utilized when creating Individualized Education Programs (IEPs) for students with disabilities.



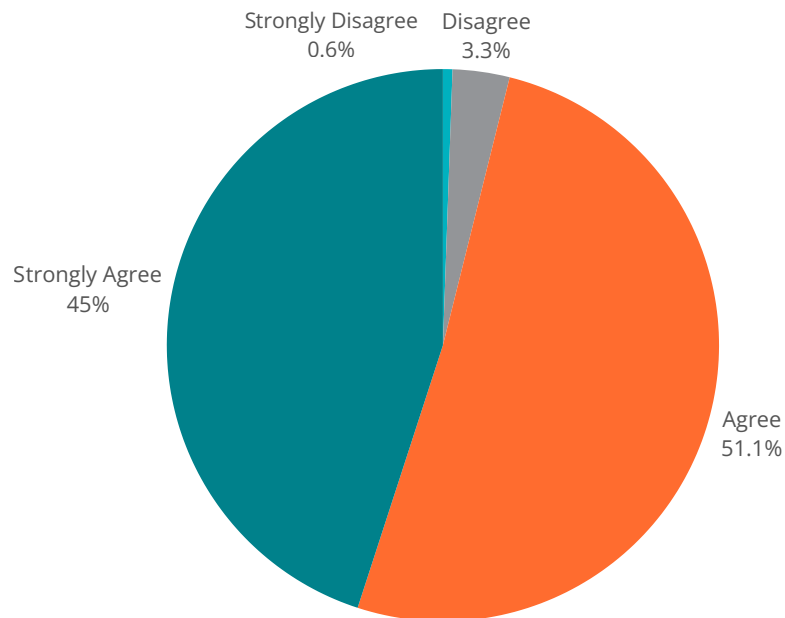
14. I have access to IEPs for each child that I serve.



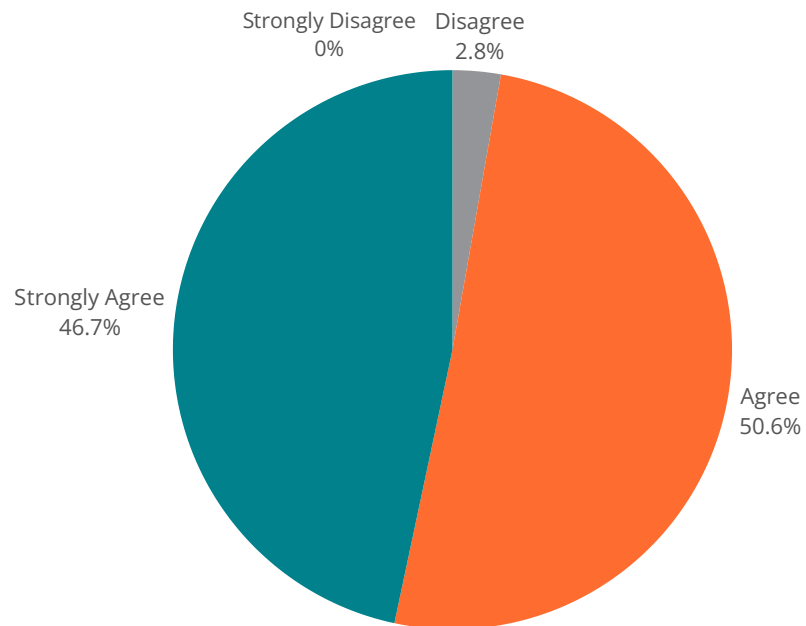
15. ARD Committees base services for students with disabilities on their individual needs, not eligibilities, to determine placement and services.



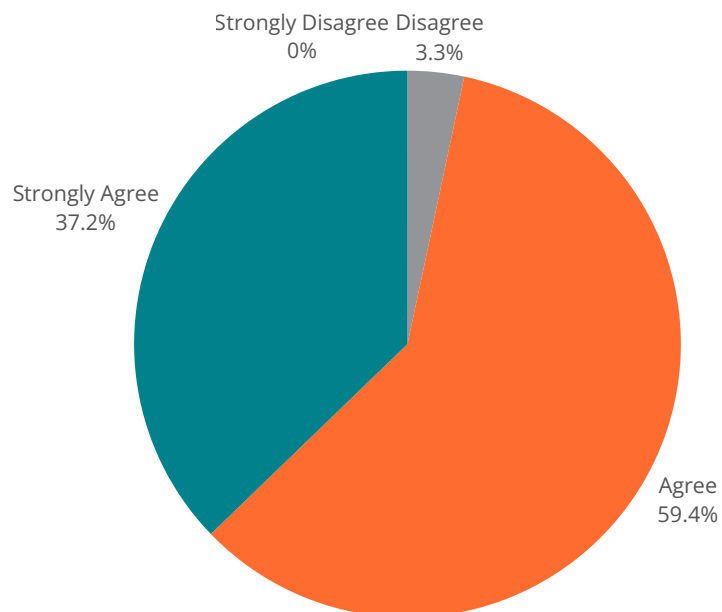
16. Parents of students with disabilities are viewed as equal partners in the education of their child.



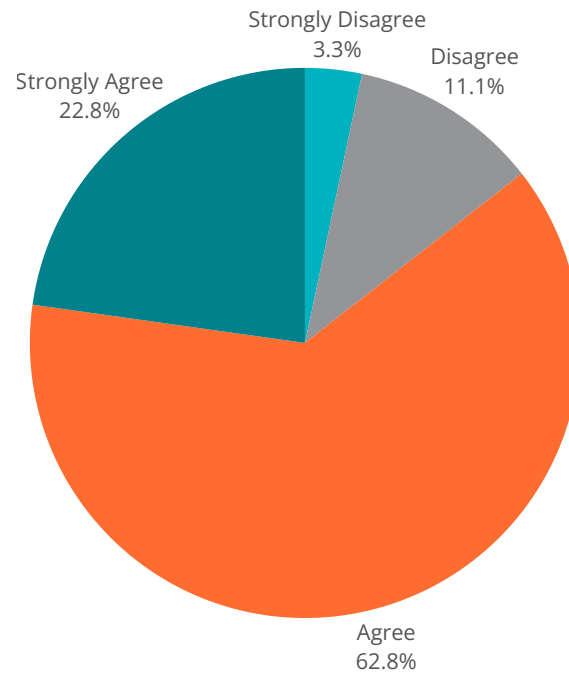
17. Parents of students with disabilities are equal members of the ARD committee.



18. Relationships between school and parents of students with disabilities are generally positive.



19. The implementation of Multi-Tiered Systems of Supports (MTSS) has positively impacted the overall support and performance of students.



Staff survey open-ended response summaries

The following summarizes the comments most frequently mentioned by staff in response to the respective questions.

What are your thoughts and experiences regarding the implementation of Multi-Tiered System of Supports (MTSS) in the district to address the diverse needs of students, including those with disabilities? Please share your insights and feedback.

Most staff responses indicated they positively view MTSS implementation. Respondents described it as an effective framework for identifying student needs and providing targeted interventions. Staff frequently noted that MTSS helps prevent misidentification and ensures that students receive appropriate levels of support. However, some staff indicated they are unsure how MTSS works or how it is applied at their campus.

To what extent do you believe there is shared ownership and collaboration among staff in providing services for students with disabilities? Please provide your perspective.

Many staff reported that collaboration and shared responsibility among staff are present and important when serving students with disabilities. Teachers, special education staff, and support personnel were frequently cited as working together through meetings and classroom collaboration. However, a notable amount of responses suggested that collaboration could be stronger or more consistent particularly between general education and special education teachers. Staff noted the need for more opportunities to collaborate.

In your opinion, what areas of support for students with disabilities does Eagle Pass ISD excel in?

Committed personnel, targeted instructional programs, and strong compliance are perceived as the district's strongest assets in supporting students with disabilities. Staff highlighted the district's dedicated staff, specialized programs, and individualized support as key strengths. Staff also noted the district does well in building positive relationships with students and providing the direct supports that students need. Staff also frequently mentioned the district has strong practices related to compliance.

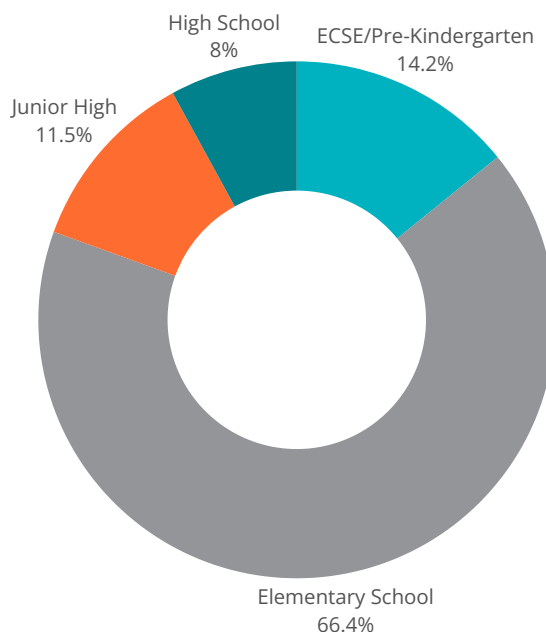
In your opinion, what additional resources or support would be most beneficial for improving the district's services for students with disabilities?

The most frequent request among responses was the need for more personnel and resources. Many staff specifically requested additional special education teachers, assistants, diagnosticians, and speech staff. Respondents also suggested more professional development and training and increased services to meet growing needs of students.

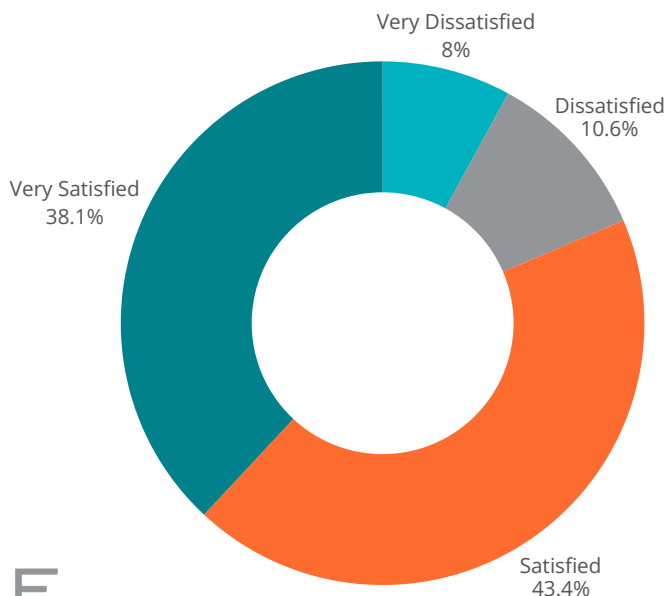
Parent survey

EPISD administered a survey, designed by TCASE Services by Design, to parents of children receiving special education services. Two versions of the survey, one in English and one in Spanish, were provided. The survey yielded a total of **114** responses including 77 English responses and 37 Spanish responses.

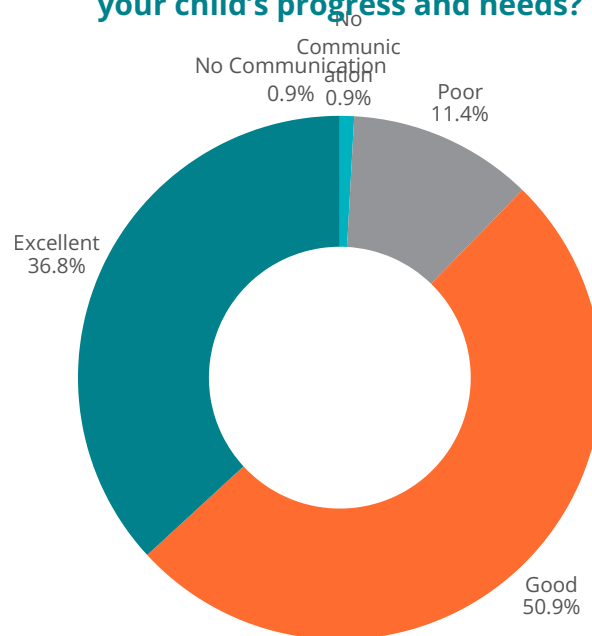
1. My child attends:



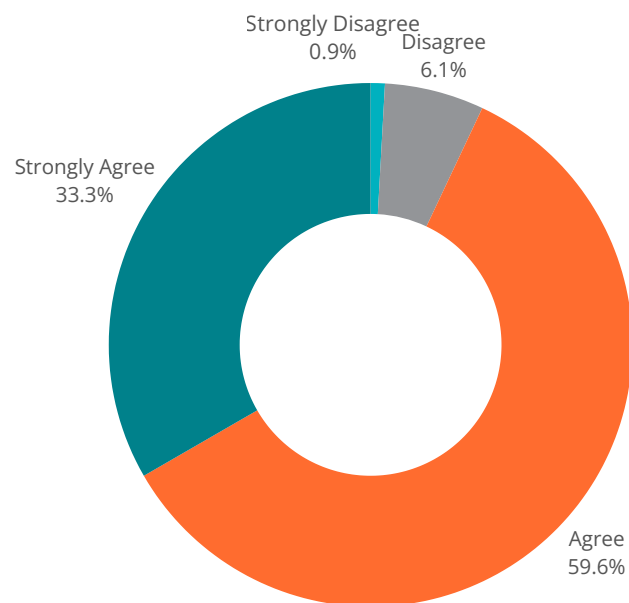
2. How satisfied are you with the overall education experience your child receives?



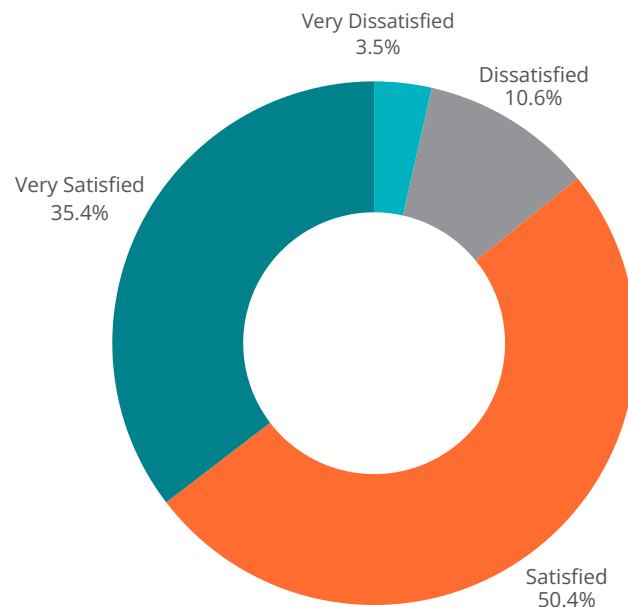
3. How would you rate the communication between school staff and parents regarding your child's progress and needs?



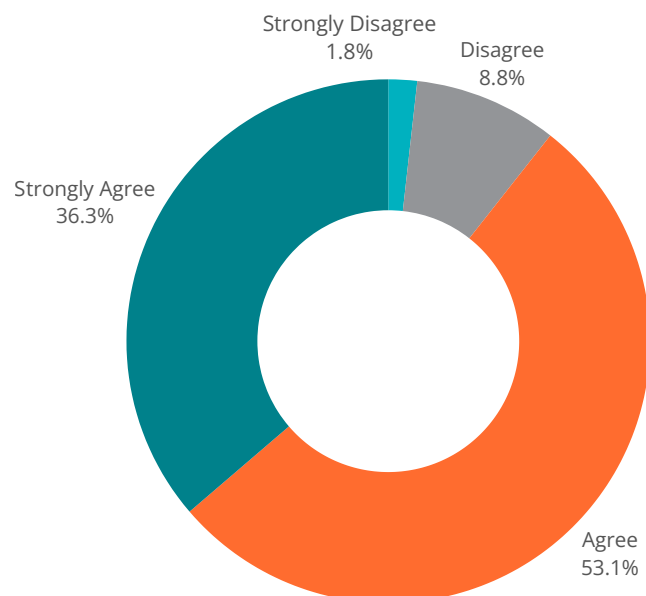
4. I am treated as an equal member of the ARD Committee, and my input is valued.



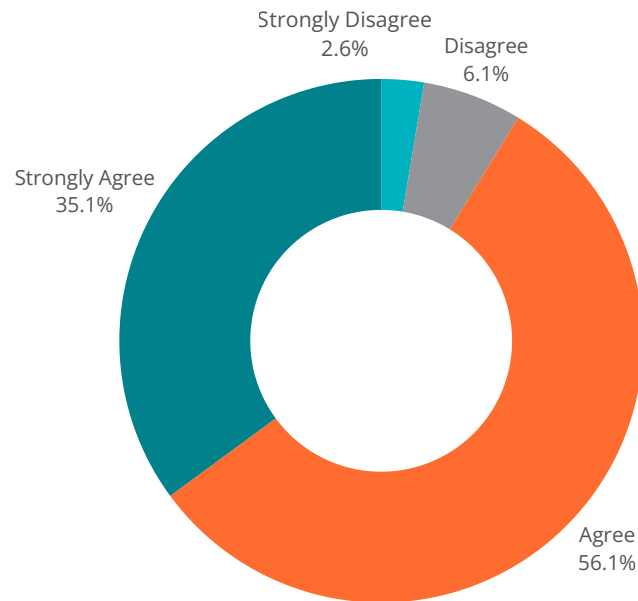
5. How satisfied are you with the development and implementation of your child's IEP?



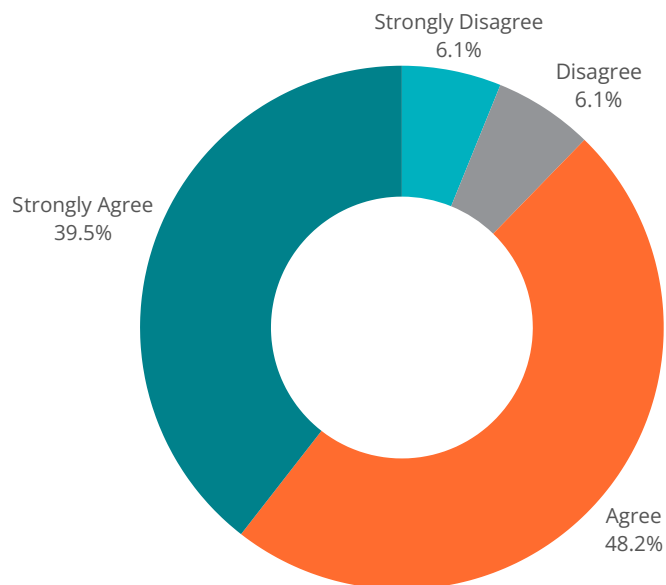
6. The school staff follow my child's IEP.



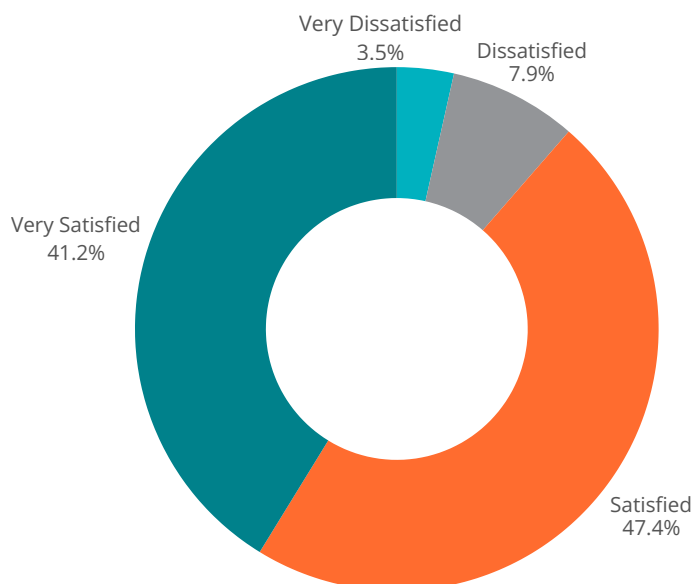
7. I feel supported by the principal in assuring that my child receives a quality education.



8. I feel supported by the special education central office staff in assuring my child receives a quality education.

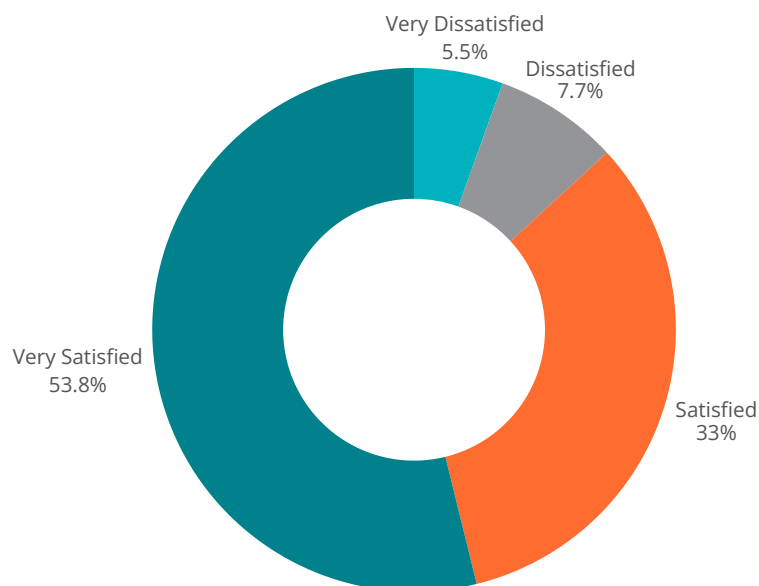


9. How satisfied are you with the quality and effectiveness of the teachers' skills to address your child's needs and deliver services outlined in your child's IEP?

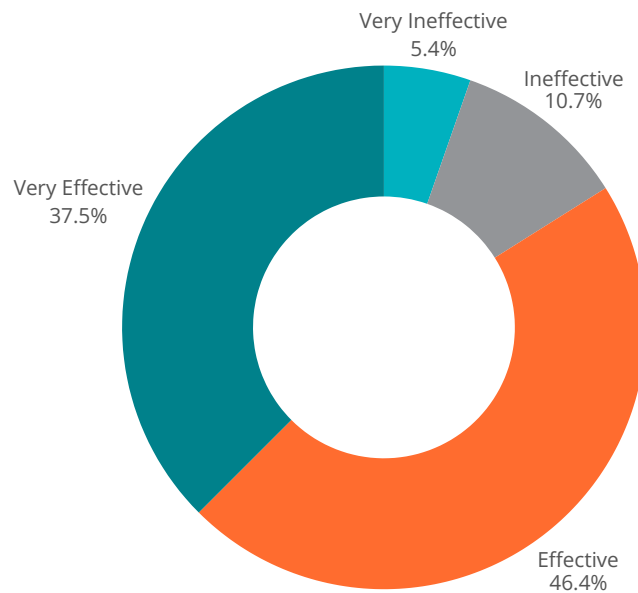


10. How satisfied are you with the quality and effectiveness of the related services (Speech Therapy, Occupational Therapy, Physical Therapy, Music Therapy, Assistive Technology, etc.) your child is receiving?

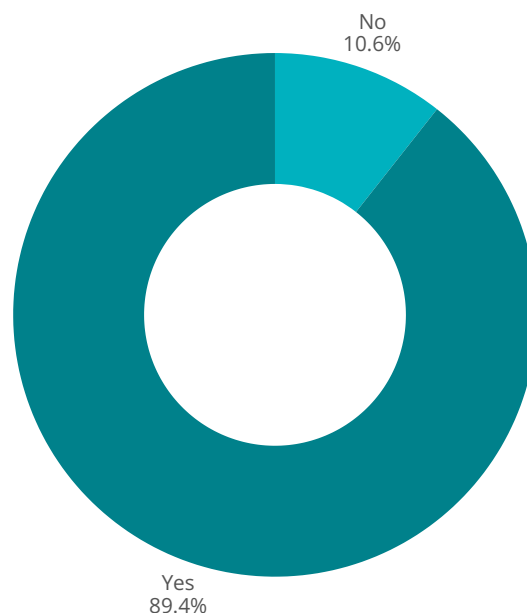
Note: 23 parents responded that this question did not apply to his/her child. The percentages below reflect opinions of 91 parents whose children receive related services.



11. To what extent do you feel that special education teachers and general education teachers collaborate effectively in planning and implementing your child's IEP?



12. Do you feel that your child has an equal sense of belonging and inclusion at school, regardless of their disability or needs?



Parent staff survey open-ended response summaries

The following summarizes the comments most frequently mentioned by families in response to the respective questions.

What positive aspects have you observed or experienced regarding services provided to students with disabilities?

Families most frequently reported noticeable improvement in their children's academic, communication, and social skills as a result of the special education services provided by EPISD. Many shared that their children are speaking more, reading better, gaining confidence, and becoming more comfortable at school. A common theme was appreciation for the care and attention from teachers and staff. Parents noted that staff make efforts to support the needs of every child. Several parents also emphasized that their children are included alongside their peers.

Are there any specific suggestions or improvements you would like to see in terms of services for students with disabilities?

While many parents had no suggested changes, the most common recommendations focused on increased communication, additional special education staff, and more support services. Several parents suggested more frequent communication and meetings between teachers and families about student progress. Other families recommended more specialized staff and programs such as more special education teachers, paraprofessionals, and opportunities for individualized instruction.



PRIORITY CONSIDERATIONS

The following priorities represent the most critical areas for the district to address in order to strengthen instructional consistency, expand inclusive practices, and ensure sustainable program implementation while building on the district's strong culture and commitment to serving students with disabilities.

Priority 1: Establish a clear districtwide instructional and service delivery framework.

The district currently operates with significant campus autonomy and limited systemwide guidance which has led to inconsistent instructional practices, uneven inclusion, and variation in program quality. Developing a clearly defined continuum of services and instructional framework would standardize expectations for inclusive practices, instructional models, and program implementation across campuses.

Priority 2: Address staffing shortages through a strategic staffing model.

Staffing shortages across instructional, evaluation, and related service roles are placing significant pressure on staff and limiting the district's ability to expand inclusive services. The development of a formal staffing model tied to student needs and service intensity would guide hiring priorities, reduce caseload pressures, and support more effective instructional delivery.

Priority 3: Strengthen system oversight and central support capacity.

The district's strong campus culture and leadership are clear strengths, but limited central department capacity reduces the ability to monitor program implementation and support campuses consistently. Increasing central support and establishing stronger monitoring systems will help ensure consistent practices across campuses while preserving the strong community culture already present in the district.

CLOSING REMARKS

Eagle Pass Independent School District and its employees have demonstrated a strong commitment to serving students with disabilities through strategic problem-solving, cross-departmental collaboration, and sustained efforts to strengthen systems during a complex and demanding period in public education. The district's engagement in reflective analysis and intentional planning for the future position it for continued growth and systemic improvement.

The team at TCASE Services by Design appreciates the partnership and trust extended throughout this review process. The openness, professionalism, and dedication demonstrated by district and campus staff contributed to the value and productivity of the special education program review.

It has been a privilege to collaborate with EPISD, and we are grateful for the opportunity to support the district.



TCASE
SERVICES BY DESIGN

APPENDIX A

15 campuses visited	
Early childhood	
Early Childhood Center	
Elementary	
Graves	Henry B. Gonzalez
Pete Gallego	Rosita Valley
Junior high	
Eagle Pass	Memorial
High	
C.C. Winn	Eagle Pass