ESSA State Consolidated Plans: 
Rethinking MTSS to Better Address Barriers to Learning

As states develop their ESSA consolidated plan, the opportunity arises to significantly enhance how schools address barriers to learning and teaching and re-engage disconnected students. In particular, innovative planning can lead to ending the marginalization and fragmentation of student and learning supports and can move beyond the limitations of the Multi-Tiered System of Support (MTSS) framework. This brief clarifies the short-comings of the multi-tier framework as applied to addressing barriers to learning by analyzing North Carolina’s adaptation of MTSS in its ESSA draft plan. This analysis is followed by discussion of a way to rethink MTSS based on recent research and development.

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As states, districts, and schools plan in the wake of the Every Student Succeeds Act (ESSA), we are analyzing how the plans advance efforts to better address barriers to learning and teaching and re-engage disconnected students. We anticipate that ESSA State Consolidated Plans will closely respond to the federal legislation’s sections and guidelines. And we know that by following ESSA’s guidance, every plan at least will highlight a list of efforts to provide student and learning supports. We caution, however, that plans that mainly respond in this way will parallel the failings of the legislation. (See ESSA, Equity of Opportunity, and Addressing Barriers to Learning — [link to PDF].)

That is, such plans will

- continue to muddy the nature and scope of student and learning supports by scattering references to such supports throughout the various sections of the plan and thus address barriers to learning in a piecemeal and mostly indirect manner;
- fail to reference the type of direct standards and accountability that can guide the development of an effective system for addressing barriers to learning and teaching;
- marginalize and give short shrift to student/learning supports personnel.

(See A Concerned Analysis of Arizona’s ESSA Draft Plan for Supporting All Students — [link to PDF].)

We have now analyzed North Carolina’s draft ([link to PDF]). And, as is the case with Arizona’s draft plan, we find it also reads like a checklist response to the guidelines, albeit with occasional elaborations stressing current practices and planned innovations.

The result in both cases is a piecemeal plan rather than the type of cohesive and comprehensive blueprint for significantly improving schools and enhancing equity of opportunity for every student to succeed.

MTSS Exemplifies the Problem

One example of ESSA deficits related to addressing barriers to learning and teaching is a reliance on the Multi-Tiered System of Support (MTSS) framework. ESSA emphasizes use of a school-wide tiered model (also referred to as a multi-tier system of supports) as a framework for preventing and addressing behavior problems. In the legislation, the tiered model is defined as “a comprehensive continuum of evidence-based, systemic practices to support a rapid response to students’ needs, with regular observation to facilitate data-based instructional decision-making.”

The appeal of this simple framework is great. In the North Carolina draft plan, MTSS is adapted as a broad framework to encapsulate practices for analyzing “the overall health of the educational system by examining the system, implementation, and outcome data sets.” At the same time, the framework encompasses the “Three-Tiered Instructional/Intervention Model” as a multi-tier system of supports for preventing and addressing behavior problems.
More specifically, the North Carolina plan first broadly frames MTSS.

MTSS is defined as “a comprehensive continuum of evidence-based, systemic practices to support a rapid response to students’ needs, with regular observation to facilitate data-based instructional decision-making.”

The plan states: “The core belief of NC MTSS is that implementation of appropriately matched instructional and practices, curriculum choices within a well-designed environment results in successful outcomes for the majority of students in the school, without the need of additional supports.”

It also states that “MTSS is an every education problem-solving framework of evidence-based practices in instruction, assessment, and curricula alignment that address the needs of all students. MTSS allows educators to analyze the overall health of the educational system by examining the system, implementation, and outcome data sets. MTSS allows for a rapid response system to address group and individual student needs to ensure students are provided evidence based, appropriately targeted instruction for academic, behavior, and/or social emotional needs. Structured problem solving occurs within the school and district setting at various tiers, and with increasing complexity, as the resources needed to resolve a problem increase. The intent of the problem-solving process is to resolve the problem, using the necessary resources, as early as possible for district, school, group and individual needs.”

Within this framework, a three-tiered instructional/intervention model is described as “another critical element of MTSS implementation.” This element includes use of early intervening services and specific approaches such as positive behavioral intervention and supports. It is presented as a set of strategies for enabling children with disabilities and English learners to meet challenging state academic standards. These interventions are to be coordinated with similar activities and services carried out under the Individuals with Disabilities Education Act. The plan states that:

“In a typical system, Tier I includes the instruction all students get; Tier II includes supplemental instruction or intervention provided to students not meeting benchmarks; and Tier III includes intensive, small group or individual interventions for students showing significant barriers to learning the skills required for school success. It is important to consider both academic and social-emotional/behavioral instruction and interventions when examining this domain.”
As noted, the simplicity of the tiered presentation as widely adopted is appealing and does help underscore differences in levels of intervention. However, while focusing on levels of intervention is essential, multi-tier formulations as commonly applied are insufficient for addressing barriers to learning and teaching. Three basic concerns about such formulations are that they mainly stress levels of intensity, do not address the problem of systematically connecting interventions that fall into and across each level, and do not address the need to connect school and community interventions. As a result, adopting MTSS does little to end the fragmentation, never mind the marginalization, of student and learning supports in school improvement efforts.

A Way Forward: What Our Research and Development Indicates

Over the years, our analyses of school improvement activity has indicated that planning is guided primarily by a two component framework; that is, the focus primarily is on (1) instruction and (2) governance/management. The result: all interventions for addressing barriers to learning and teaching and re-engaging disconnected students are given secondary consideration at best. This marginalization is an underlying and fundamental cause of the widely observed fragmentation and disorganization of student and learning supports.

Moving Forward Requires Expanding Policy to End the Marginalization

Establishing a three component school improvement framework can end the marginalization and the related disorganization and provide a foundation for weaving together whatever a school has with whatever a community is doing to confront barriers to equity of opportunity. As illustrated in Exhibit A, the expanded policy framework establishes efforts to directly address barriers as a learning supports component and makes it a primary school policy commitment.

The policy expansion illustrated in the exhibit already is underway. A large-scale example is the initiative in Alabama where the state education agency has adopted the three component policy framework with plans for statewide implementation. Fifty districts and approximately 300 principals are currently involved.

Exhibit A. Expanding the Framework for School Improvement Policy and Practice

Note: Because policy for improving schools across the country is "standards-based" and accountability driven, expanding the prevailing accountability framework and establishing standards for learning supports are key considerations in effective implementation of a three component policy.
Expanding the school improvement policy framework to include learning supports as a primary component provides the essential foundation for transforming how states and districts address the large number of schools and students who need essential supports. The aim is to unify and develop a comprehensive and equitable intervention system for addressing barriers to learning and teaching and re-engaging disconnected students. This involves first unifying and weaving together all school resources currently expended for student and learning supports. And then, the focus is on discriminatively braiding school and relevant community resources together to strengthen interventions and fill gaps. The intent over time is to transform student and learning supports by replacing ad hoc and piecemeal policies and practices with a comprehensive, cohesive, and equitable system that can serve all students.

Simply adopting and tweaking ESSA’s view of a multi-tier framework falls far short of planning to develop student and learning supports into a unified, comprehensive, and equitable system that supports teachers in-classrooms and school-wide. Moving toward such a system involves reframing MTSS into a multifaceted approach. As discussed below, the emphasis is not just on levels of intervention, but on an interconnected continuum of subsystems that weaves school and community resources together and on a cohesively organized set of content arenas of activity. These two facets combine into a comprehensive intervention framework.

**1) Continuum of subsystems.** Few will argue against the notion that conceptualizing levels of intervention is a good starting point for framing the nature and scope of an intervention continuum. However, as stressed above, MTSS is not the best way to depict such a continuum, never mind a unified, comprehensive, and equitable system of student and learning supports.

An example of another way to conceive the levels is in terms of what they aim to do and as an interrelated and overlapping continuum of braided school and community subsystems. The subsystems focus on promoting effective schooling and whole child development, preventing problems experienced by teachers and students, addressing such problems as soon as feasible after they arise, and providing for students who have severe and chronic problems.

As illustrated in Exhibit B, we operationalize the levels as three subsystems. Each subsystem is seen as weaving together a wide range of school and community resources. The interrelated and overlapping subsystems are illustrated as tapering from top to bottom to indicate the view that if the top is well designed and implemented, the numbers needing early intervention are reduced and then, as more are helped through early-after-onset assistance, fewer students will need “deep-end” interventions.

**2) Content Arenas of Activity.** A system of student and learning supports requires more than conceiving a continuum of intervention. For example, “mapping” done with respect to the MTSS framework does not escape the trend just to generate laundry lists of programs and services at each level. Thus, in addition to the continuum, it is necessary to organize interventions cohesively into a circumscribed set of well-designed and delimited arenas that reflect the content purpose of the activity.
Our research and development efforts have categorized programs and services into six arenas based on concerns that schools need to address each day. In organizing the activity, it becomes clearer what supports are needed in and out of the classroom so that teachers can enable the learning of students who are not doing well. The six arenas encompass:

- **Enhancing regular classroom strategies to enable learning** (e.g., improving instruction for students who have become disengaged from learning at school and for those with mild-moderate learning and behavior problems; includes a focus on prevention, early intervening, and use of strategies such as response to intervention)
- **Supporting transitions** (i.e., assisting students and families as they negotiate school and grade changes and many other transitions)
• *Increasing home and school connections and engagement*
• *Responding to, and where feasible, preventing crises*
• *Increasing community involvement and support* (outreach to develop greater community involvement and support, including enhanced use of volunteers)
• *Facilitating student and family access to effective services and special assistance* as needed

Some version of the six basic arenas has held-up over the last decade in a variety of venues across the country (see *Where’s it Happening* – [http://smhp.psych.ucla.edu/summit2002/nind7.htm](http://smhp.psych.ucla.edu/summit2002/nind7.htm)).

(3) *Continuum + content.* Combining the continuum and arenas of content activity moves MTSS thinking forward. It provides an intervention framework that can guide development of a total system designed to unify the resources a school devotes to student and learning supports, as well as braiding in community resources to fill critical gaps and strengthen the system (see Exhibit C).

**Exhibit C. Prototype Intervention Framework for the Third Component**

**Integrated Intervention Continuum** (levels)

<table>
<thead>
<tr>
<th>Subsystem for Promoting Healthy Development &amp; Preventing Problems</th>
<th>Subsystem for Early Intervention</th>
<th>Subsystem for Treatment (“System of Care”)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Arenas of Intervention Content</strong></td>
<td>Classroom-based learning supports</td>
<td>Supports for transitions</td>
</tr>
<tr>
<td><strong>Accommodations for differences &amp; disabilities</strong></td>
<td><strong>Specialized assistance &amp; other intensified interventions (e.g., Special Education &amp; School-Based)</strong></td>
<td></td>
</tr>
</tbody>
</table>

Note: All this has implications for enhancing in-classroom student and learning supports by retooling what ESSA labels as specialized instructional support personnel (e.g., student and learning support personnel – psychologists, counselors, social workers, nurses, Title I staff, dropout/graduation support staff, special educators, etc.). The jobs of these personnel need redefining to include working collaboratively with teachers in classrooms for part of each day. Improving student and learning supports in classrooms requires such collaboration, and such collaboration is essential to ending the myths and expectations that teachers can do it all and can do it alone.
We know that none of this is easy, but no one who understands the complexity of enhancing equity of opportunity expects to accomplish essential systemic changes easily. As states and districts develop innovative plans to address barriers to learning and teaching and re-engage disconnected students, their strategic plans must include a focus on

- *reworking operational infrastructures* to ensure effective daily implementation and ongoing development of a unified and comprehensive system for addressing barriers to learning and teaching;⁴
- *enhancing mechanisms and strategic approaches for systemic change* in ways that ensure effective implementation, replication to scale, and sustainability;⁵
- *developing standards and expanding the accountability framework* to account for the third component and to do so in ways that encompass both formative and summative evaluation.²

And clearly states will need to develop and institutionalize the type of support infrastructure that can continuously facilitate significant and sustainable LEA and school level systemic changes and ensure ongoing local capacity building – especially at low performing schools. Such an infrastructure requires a cadre of coaches who can develop and train LEA leadership teams.⁶

**Concluding Comments**

As states develop their ESSA consolidated plan, addressing barriers to learning and teaching and re-engaging disconnected students is a school improvement imperative. In revising school improvement plans, the opportunity arises to end the marginalization and fragmentation of student and learning supports and to move beyond the limitations of the MTSS framework.

Transforming student and learning supports is the next evolutionary stage in enhancing equity of opportunity. It is an essential pathway to closing the achievement gap, enhancing school safety, reducing dropout rates, shutting down the pipeline from schools to prisons, and promoting well-being and social justice.
Notes

1 See examples and lessons learned in Where’s it Happening? –

2 For an accountability prototype that focuses not only on achievement, but on personal and social
development and on improvements that directly address barriers to learning and teaching, see “Expanding
the Accountability Framework for Schools” Appendix A in Transforming Student and Learning
Taylor. Los Angeles: Center for Mental Health in Schools

And for a prototype of standards and indicators for a learning supports component, see Standards &
Quality Indicators for an Enabling or Learning Supports Component (2014). Los Angeles: Center for

3 A brief discussion of and examples related to each of the six content arenas is offered in Part II of

4 See Key Leadership Infrastructure Mechanisms for Enhancing Student & Learning Supports –

5 See Bringing New Prototypes into Practice: Dissemination, Implementation, and Facilitating

6 Guide for Planning Coaching for SEAs/LEAs to Establish a Unified and Comprehensive System of

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*For information about the

National Initiative for Transforming Student and Learning Supports,

http://smhp.psych.ucla.edu/newinitiative.html

And note that our new book detailing the prototypes
and related resources is now in press.

For a preview, contact ltaylor@ucla.edu.

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