MTSS: Strengths and Weaknesses

ESSA (the Every Student Succeeds Act) stresses a devolution of power to states and districts. *How is that power being used to enhance how schools address barriers to learning and teaching?*

One trend has been a widespread adoption by states/districts/schools of some form of multitiered system of support (usually referred to as MTSS, although some places are using other acronyms). This is not surprising given this framework's emphasis in federal legislation.

In ESSA, for example, a schoolwide tiered model (also referred to as a multitier system of supports) is referenced for preventing and addressing behavior problems. 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 tiered model (including use of early intervening services) and specific approaches such as positive behavioral intervention and supports are presented as strategies for enabling children with disabilities and English learners to meet challenging state academic standards and are to be coordinated with similar activities and services carried out under the Individuals with Disabilities Education Act.

Our Center has sent out inquiries about how school districts, state departments of education, and leadership organizations are pursuing the opportunity to transform the way schools address barriers to learning and teaching and re-engage disconnected students. In that context, we also have been seeking and receiving responses about the strengths and weaknesses of MTSS (Multi Tiered System of Support) as a framework for improving student/learning supports.

Below we summarize our concerns and provide a sample of comments from the field.

Center concerns: As emphasized in the Every Student Succeeds Act (ESSA), a schoolwide tiered model (also referred to as a multitier system of supports) is referenced for preventing and addressing behavior problems. 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 tiered model (including use of early intervening services) and specific approaches such as positive behavioral intervention and supports are presented as strategies for enabling children with disabilities and English learners to meet challenging state academic standards and are to be coordinated with similar activities and services carried out under the Individuals with Disabilities Education Act.

It is important to understand that current discussions of MTSS do not account for its serious limitations as a framework for student and learning supports. Among our concerns are:

> >MTSS is an inadequate depiction of a continuum of student/learning supports (e.g., it simply delineates levels of school interventions, rather than subsystems of school/community student/learning supports)

> >it does not clarify the contribution each level can make to reducing the number of students in need of special assistance (and relatedly how the continuum applies the principle of using the least intervention necessary and the practice of using response to intervention)

> >it does not systematically organize into the continuum of supports the content of what schools do each day to address learning, behavior, and emotional problems.

Our analyses indicate that the term MTSS is widely being adopted as a planning convenience without detailing how it will be translated into practice at schools. As the term becomes yet one more set of initials, the risk is that it simply will become another school improvement buzzword.

It will do little to enhance a school's effectiveness in addressing barriers to learning and teaching and re-engaging disconnected students. Enhancing equity of opportunity for success at school and beyond requires going beyond how MTSS generally is conceived and implemented.

Those who value a multi-tiered continuum need to evolve it into a much more innovative and transformative framework for increasing the effectiveness of student/learning supports.

Comments about MTSS from the field: A November report from the Brookings Institution reviews a sample of state ESSA plans. It states:

> *A number of plans mention "multi-tier systems of support." The logic of these systems is thatstudents, schools, or districts can be arrayed into tiers. The lowest tier applies to just about everybody. Those in higher tiers need more support. Arraying individuals into tiers can be cost-effective to the extent that lower-cost forms of assistance can be broadly applied and higher-cost forms of assistance can be narrowly applied to those showing they really need the assistance. It is like triage in hospital emergency rooms. However, what happens in the highest tier still needs to be identified. The notion of using tiers is simply structural - the tiers need to be filled with something.*
>> (From: "State Plans Under the Every Student Succeeds Act: Where is the Research?" by Mark Dynarski
>> https://www.brookings.edu/research/state-plans-under-the-every-student-succeeds-act-where-is-the-research/)

Here are a few of the many responses we received as part of an exchange on the Center's community of School Practitioners.

> >"I agree that MTSS has become a buzz word and is typically used in a top down manner that is less rather than more helpful. In theory, MTSS is sensible: it is supporting school leaders thinking about an ecologically informed manner about systemic and instructional efforts on the one hand and supporting school leaders working to coordinate these efforts. In practice, I rarely see coordination being practiced. And, it is very rare that fostering engagement (and what I more and more describe as inter generational school improvement efforts) is a focus...."

> >"I find MTSS to be a structure that provides schools with the framework to develop 'toolboxes' of available resources, whether they be grounded in curriculum resources or as part of community support networks. Ideally, MTSS would be broad enough to encompass 'wrap around' services available in the community. We have worked to develop tiered intervention that isn't restricted to school programming and includes community services. We're not there yet, but I do believe MTSS provides a structure where it is possible to include broader interventions. And in my experience, educators crave structure. So if MTSS provides that base need, let's make it encompass community resources!"

> >"Concepts in education seem to become rigid and mechanical when they are translated into policies, practices and action plans. MTSS is one example. I believe the MTSS was developed as a framework that enabled schools to integrate prevention and intervention science into practice, a continuum that has its basis in school/community wide promotion and prevention practices as well as support for those needing support. It has some roots in public health. This is the foundation. In practice it should be seamless and based upon the sound conditions for learning (CFL) that enable educators to better ensure a focus on universal promotion and prevention. PBIS is not a great example of a universal skill developing practice and the goal of meeting state standards has not been primary to MTSS in my mind. A 'system of support' is dependent upon the effective use of measurement and of individualized connection and caring as well as effective academic instruction. MTSS can be compatible with addressing barriers to learning. Sadly MTSS, like many constructs has gotten distorted in its application and some schools, systems and states

see it as a sorting tool. It is like the application of RTI. RTI was a term for schools to look at the effectiveness of their intervention's, their design and implementation. RTI for too many focuses on the child's response rather than the effective design and implementation of the interventions. Student Support Teams were staffed and designed to provide systemic information to enhance school-wide conditions for learning as well as to design and monitor student interventions but few seem to implement this systemic function. Barriers to learning and teaching should be part of the foundational design and implementation of community schools."

>"My experience is as you described. Looks good on paper. Hard to get sufficient buy-in from school staff. People tended to simplify the process to meet their own ability to deal with complexity, maintain their own little spheres of influence, and protect themselves from negative evaluations in the case the student fails to show progress. Knew a few teachers who sabotaged lower level implementation of interventions because they already 'knew' via their experience & expert opinion which placement the student really needed. They wanted to move students along to more restrictive environments as quickly as possible and a successful intervention would slow down or eliminate further placement. Knew a few teachers who never referred students for assistance because they feared the principal would use that to lower their performance rating."

>"MTSS framework, while a great vehicle for Learning Supports efforts, doesn't go far enough to stress prevention and resiliency. There are some translational problems with the application of MTSS concepts. Generally speaking, school folks tend to be problem focused. If there are behavior problems or reading problems, interventions are designed to help. That's great. But I have to wonder, what are schools doing to PREVENT behavior or reading problems. Behavior problems and learning issues are well-documented. An intervention is put into place and it either works or doesn't and school folks move on to another intervention — or another student in need of an intervention. The data are there to show that there was a problem and something was done.

But are data being collected and used to identify the larger issues (barriers) that are at the root of student problems? To use your example, are schools trying to save individuals drowning in the stream, or are they using what they know to repair the bridge that's causing people to fall into the water? Prevention and building student resiliency is much more complex than addressing problems.

Staff need to understand the research, effective practices, indicators of success and have the support to put things into place that will help to prevent problems in the first place. That includes working with community subsystems, being focused on reducing numbers of students with learning issues, and changing day-to-day practice to build resiliency in students. And these things can't be accomplished within the confines of the school building. Teaching a child to read can be done inside a school building and is the job of a teacher. Teaching a child to learn should happen everywhere and is the job of the community. My question for schools using the framework would be, 'Is the time spent on problem-focused efforts to help students equal to the time spent on prevention of problems?'"

>"In our district, we have been discussing this issue and agree with your assessment. Below I will share my opinion on this issue based on my experience over the years. Over the past twenty-five plus years this has becomes a common theme in how school sites and districts explain their work in support services. I was able to see how other districts viewed support services because of my twenty-two years at the university as part-time faculty. MTSS is now the 'buzz word', and I saw the same thing with 'RTI'. We could list a number of 'programs' that serve the same purpose for education: to 'simplify' working on 'Barriers to Learning'. It becomes a 'checkbox' in order to meet mandates and/or funding requirements.
   In a short list, I'll try to explain some issues that I have found difficult to overcome:
   • I think your preliminary analyses is is very insightful and is correct. In the development of our district's MTSS framework, it was clear that there was general direction as we looked at other state-wide plans, but not a comprehensive approach of how to address the structure. The district took the MTSS as a framework, but used Learning Support Teams as a way to design the work to address the five key components of the MTSS Framework. If you look at those

components Learning Support Teams embraced the structure of the work. What has been interesting is how that continuum is perceived by the school sites and also some of the leadership. It has been a challenge to have sites and individuals see that connection. I believe our district could have only used the Learning Support Teams work with their schools, but because of funding and accountable issues, MTSS language needed to be used. Truth be told, MTSS forced the district into this work. It wasn't until after the trainings started that it was realized how important Learning Support Teams work was for the organization of the MTSS Framework.

- It seems to be able to understand and organize round addressing learning, behavior, and emotional supports you need to have leadership that think systematically. Because I have worked with 'system thinking' individuals, I assumed that most people think that way. I was incorrect. The challenge in developing a intervention continuum is to have leadership that guides that work in a systematic way. Unfortunately, I have run into many educational leaders who believe they are system thinkers, and they are not.
- Individuals that support classrooms, teachers, students and families also play an important part in development of this systematic approach to support. Unfortunately, my experience has been that support staff wants to work with individuals and can be very resistant to systematic organization to supports, as well as, partnering with other disciplines and outside agencies.

In the end, there needs to be a cultural change in education in how it views student supports. I don't believe we truly train educators in how to manage those supports. Because of this, developing a comprehensive systematic approach to developing prevention and intervention supports for students and families become difficult because you have to change thinking. My guess is that district and sites that have developed a comprehensive approach have changed their culture, but the true test is if the supports are sustainable over time. This work has been driven by individuals, it needs to be driven by the system itself. I have struggled with getting people to understand the importance of this work. The joy comes when someone 'gets it' and you see the change in how supports are organized for student, families and staffs. You see the change."

>"Here in our state we are doing a lot of work with MTSS (which is also the way we are moving under our ESSA plan). However we are taking a comprehensive look at how the MTSS structure can address ALL needs of students not 'just learning'. We are looking at services and supports for all 3 tiers for learners. We also know that those tiers can be fluid and variable for youth. We have just officially approved our states Social and Emotional Learning Competencies (SEL) for Birth through Grade 12 which are part of our Tier 1 approach. We've connected the SEL Competencies to the School Improvement planning process for schools to encourage their inclusion in all academic subjects and schoolwide to help address culture and climate. We are in the process of helping schools see the connection between SEL & school mental health and trauma efforts. (as well as PBIS and Rti etc). We have a district in our state who is a SHINING star in this arena. I guess our philosophy is if the movement is towards MTSS how can we take our student support efforts and align them so they don't get lost in the sauce. (essentially if you can't beat em join em...??)"

>"First of all MTSS is only mentioned in the ESSA in lower case letter about 7 times, with no definitions or explanations. However, mental health and trauma-informed are mentioned over 30 times. When I asked a representative from ESSA who came to our state, what MTSS is, he did not have any clarity at all. A MULTI tiered model THAT supports IDEA studentS??? I am hoping that the ESSA did not intend for this to be a component of Special Ed or ELL, but something for all children in the public schools. There are more severe limitations with the ESSA, and MTSS is a start. It is the only framework that is noted and what we need to do is to flesh it out, define it and rebrand it. There is no clarity and so many people across the country are running to define this and some are doing a good job especially when they focus on building a multi-tiered response to students that includes academics and behavior and minimizes all the bulk of non-essentials that are lading our schools down. It is critical that every adult on campus become aware of their responsibility to student behavior and emotional well-being. At the end of the day, a custodian may be a better mentor for a young boy than a school counselor or a MH therapist. Our

shift in our system is that building relationships and monitoring student behavior is everyone's responsibility and to view behavior through a trauma informed lens that has compassion for students and their families at its core. The problem is the lack of substance and guidance that has been offered for this from the USDOE. I hope we will not see this relegated to IDEA and ELL, but that MTSS is the way we do business at schools. Re-branding our ideas is critical as our culture is always looking for the next initiative. This could be a "refresh"! If people are gravitating to MTSS, better we are first to the gate to define it before it defines us. Here are my guidelines for MTSS

- Must be school and zip code centric (not one size fits all, but 1 system that is customizable based on culture and resources both in a school and the community)
- Must focus on both academics and behavior (this addresses the idea of the whole child) and translates to if you teach the whole class reading writing and math... then also teach behavior. if you need to create a small group to reteach reading writing and math, then also use a small group to teach behavior to those who need targeted support. and lastly, if you meet with students individually for a few minutes to ensure they are getting it in reading writing and math... also do that for behavior. The problem is that there is a belief that those with behaviors don't belong in our classrooms. When behavior management founded in relationships with students is grounded in the teacher's classroom, then there is room for all manner of social, emotional learning as well as depth of knowledge because, the students feel safe and heard and are part of the learning day. (please look at the deeper meaning here... academics would include electives, career opportunities, science, arts, etc and behavior would be the social, emotional, behavioral and well-being part and both are inextricably intertwined).
- MTSS is for all students
- MTSS must have admin leadership and buy in with a team that can support a multi-tiered approach including those who can build relationships with family and community.
- MTSS can be the framework that ties all initiatives together with definition and support for customization and allow for a way to build processes that meet student needs.
- MTSS must use data to identify needs and those needs must be integrated into the professional development of all staff."

>"Thank you for taking on this very important question. Like so many terms in education and psychology, MTSS began with a very specific meaning and then has been generalized to many different uses. It is used to describe the levels of interventions that ought to be used to promote reading competence in schools — a comprehensive and well developed reading curriculum for all students, a small group intervention for students who continue to struggle in reading, and an intensive and individualized intervention for those students who do not benefit sufficiently from the comprehensive and small group instruction. It's also been used to describe behavioral interventions — much in the vein of Positive Behavior Supports. And it's been used more broadly to describe mental health interventions. I think that the framework is fine conceptually, but I'm suspicious because almost every author uses three levels, and every reference seems to attribute the same percentages to each level (5% need intensive supports, 15% need additional supports, and 80% of students are said to need only the population wide services.) My suspicion is that those proportions are assigned because of the funding that is going to be made available for the services and not necessarily the size of the need. I think that critical information, that needs to be more evidence-based and practice-verified, includes: how do we know which students need more intensive services and supports? what schoolwide practices are comprehensive and well-developed supports for the general enrollment of the school? what additional practices or supports are needed for the smaller (maybe smaller) groups of students who need more intensive services? and, of course, we have no good evidence that all students needing more intensive supports need the same KIND of intensive supports? So I do think that this has become a shorthand that short circuits much of the most interesting questions about how we promote the success of young people in schools."

>This is a complicated issue. The root of it, I feel, is in the US DOE's infatuation with PBIS. That articulated the 3-tiers. PBIS focused on Tier 1; RTI was brought in as a bridge between Tier 1 and Tier 2, but the evidence base behind RTI was never broad. Tier 3 was barely considered. MTSS is a way of solidifying commitment to PBIS but, as you and Howard point out, it has many shortcomings. First, it does not emphasize coordination around Tier 1. To me, that is the coordination that brings synergy. That's where the real innovation resides. MTSS also does not really differentiate between school-based and community-based services. In fact, it has been a vehicle for getting more community resources into schools but this is not an unambigous good, as it de-emphasizes school-based service providers."

In an open Letter to the MTSS exchange on the Center's community of School Practitioners, Thomas Adams, Ph.D., Deputy Superintendent, California Department of Education, Al Mijares, Ph.D., County Superintendent, Orange County Department of Education, Tim Taylor, County Superintendent, Butte County Office of Education, and Wayne Sailor, Ph.D. and Amy B. McCart, Ph.D., Co-Directors, SWIFT Education Center stated the following:

"The California Scale-up of MTSS Statewide (CA MTSS, see www.ocde.us/SUMS) team would like to add our voice to the Center for Mental Health in Schools & Student/Learning Supports (Center) School Practitioner Community of Practice exchange about how schools use multi-tiered system of support (MTSS) to address barriers to learning and teaching and to re-engage disconnected students. We believe our collective work with schools, districts, and state departments of education to transform education systems using a strengths- based approach, qualifies us to comment about this topic. The Center published very insightful comments from individuals in the field. The wisdom displayed by these educators confirms our belief that every school and district has strengths on which to build excellent teaching and learning systems that support all students, even those with the most complex needs.

The Center expressed concern that MTSS has severe limitations as a framework for student learning and upport, and needs to evolve into a much more innovative and transformative framework for increasing student learning effectiveness. Further, the Center expressed concern that MTSS is in danger of becoming just another school improvement buzzword, or in our terms, lending itself to mapping new language onto old practices and failing to address prevention and illuminating a pathway to addressing barriers to student learning.

We at CA MTSS agree with all of these concerns and, in fact, aligned our task of scaling up MTSS statewide with the broader organizing framework represented by the SWIFT Education Center's five evidence based domains and ten supporting features.... These domains and features address the barriers to learning through a framework of transformative educational supports that rest on evidence from rigorous investigations (swiftschools.org). The CA MTSS framework has amassed solid evidence to merit its efficacy in offering California schools a set of transformation practices with specific tools with which to track systems formative and summative outcomes. In reference to the findings in the Center's November 11, 2017, document we offer the following points.

1. MTSS can be more than a planning convenience when schools, districts, and states are supported to translate it into practice at schools.

   • California SUMS initiative is preparing region, county and district leaders across the state to provide support to schools that are implementing new or improving existing MTSS (see www.ocde.us/SUMS).

2. MTSS can incorporate into its continuum of services and supports the principles and practices of subsystems, such as community mental health wraparound services so that the system can support all students. • Our approach to MTSS incorporates a resource inventory and matching process designed to help schools to intentionally include community-based service providers who can address students with complex needs across home, school and community settings.

3. Equity-based MTSS is designed to prevent some students' need for special assistance through such techniques as universally designed curriculum, differentiated instruction, and schoolwide positive behavioral expectations and support. Data-based decision making is used to guide intervention decisions.

   • We are teaching California schools how to use screening and progress monitoring data with entry and exit decision rules for providing students additional or intensified support.

4. MTSS structures need to contain content on what schools do to address learning, behavior, and motional problems —that is, effective teams, useful data, evidence-based interventions and supports, etc.

> • We support schools as they use as many as possible of their existing resources and deploy these resources through an organized system using Resource Inventories, Tiered Intervention Matrices, Master Schedules, and Intervention Planning Tools.

We know from experience that MTSS is not an empty phrase; and when state and local leaders support schools in sustainable transformation to an equity-based MTSS, students experience better learning and behavior outcomes. We appreciate that the Center raised this topic for discussion and look forward to further dialogue on this critically important system change agenda."

[**Center note:** We were especially interested to learn about the use of the organizing framework adapted from the Swift Education Center in evolving MTSS. We look forward to an analysis of how that approach maps onto the frameworks advocated for the National Initiative for Transforming Student and Learning Supports– http://smhp.psych.ucla.edu/newinitiative.html .]

The following are excerpts from a response from Howard Knoff, Director, Project ACHIEVE, to the above open letter:

I know that virtually every school has Tier I, Tier II, and Tier III services now-a-days. But honestly, of the hundreds of schools that I work with each year, the vast majority have adopted approaches that:

- They do not understand and cannot fully staff
- Violate assessment and intervention science (and, sorry!!!, common sense)
- Are not implemented with the integrity and/or intensity needed for student success
- Do not link instructional and intervention strategies with the diagnostic assessments that determine the underlying reasons for students' problems
- Delay services to the most-needy students, sometimes delivering them at the Tier III level... but only after requiring these students to fail at Tier I and Tier II

Significantly, these schools are not trying to be ineffective. They simply believe that they have no time to create their own approaches . . . and so, they adopt approaches from "nationally-regarded" individuals and organizations whom they assume are "the experts."

Next, they don't know what they don't know. That is, they don't have the technical expertise to evaluate and realize that what some of "these experts" recommend has not been field-tested, will not be effective, and does not make sense for students or staff.

And let's remember, on the issue of time: Ultimately, schools spend more time at the "back-end," often over many years and grade levels, in (a) re-evaluating and re-remediating students, and (b) having to use more resources and specialists when their multi-tier systems have failed because they did not invest their research, planning, training, and effective implementation time on sound approaches at the "front-end".

And the most-tragic loss of time and function occurs when persistent student failure results in (a) students enrolling in other schools or dropping out; (b) parents publicly disparaging their schools or taking them to court; and/or (c) schools being labeled "failing schools," resulting in districts or state department of education oversight, supervision, and management.

What Does the Federal Law Say?

The term "response-to-intervention(or any of its derivatives) does not appear in the reauthorized Elementary and Secondary Education Act/Every Student Succeeds Act (ESEA/ESSA). Instead, ESEA/ESSA requires schools and districts to develop a "multi-tier system of supports" ... and it defines this 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."

Critically, the term "multi-tier system of supports" appears only five times in the entire law. Moreover, the term is always written in lower case (except where the term is the title for a section of the law), and the acronym "MTSS" (designating a particular framework or model of multi-tier services) NEVER appears.

Right from the beginning: This means that the current or any forthcoming U.S. Department of Education MTSS framework (usually disseminated through its Office of Special Education Programs; OSEP) is not required by ESEA/ESSA nor can any other national or state MTSS approach be

mandated unless it has been codified in law and statutory regulation. Relatedly, any MTSS Guidance document disseminated by the U.S. Department of Education or OSEP is just that: guidance and NOT regulation.

Moving on

Relative to the five times the term appears in the law, two appearances are in the definition as above. The other three citations appear in sections where the law talks about the need for all districts receiving ESEA/ESSA funds to:

- "(D)evelop programs and activities that increase the ability of teachers to effectively teach children with disabilities, including children with significant cognitive disabilities, and English learners, which may include the use of multi-tier systems of support and positive behavioral intervention and supports, so that such children with disabilities and English learners can meet the challenging State academic standards."
- "Provid(e) for a multi-tier system of supports for literacy services."
- Offer professional development opportunities that "are designed to give teachers of children with disabilities or children with development delays, and other teachers and instructional staff, the knowledge and skills to provide instruction and academic support services, to those children, including positive behavioral interventions and supports, multi-tier system of supports, and use of accommodations. . ."

Thus . . . nowhere in ESEA/ESSA does it specify:

- The number of tiers needed in a multi-tier system;
- The number of students to be targeted at each tier;
- How students at different tiers should be grouped, and who should work with them and where;
- What assessments should be done with students at different tiers, when they should occur, and what decision rules should be used relative to moving students up and down the multi-tier continuum.

Significantly, each school or district in this country that receives ESEA/ESSA and other federal funds has the opportunity to design, detail, and implement its own multi-tier system (within the confines of state law). Parenthetically, some MTSS systems written into some state laws have serious flaws, mainly because they adopted the U.S. Department of Education's framework.

Moreover, according to the law, most schools and districts will need to write the details of their multitier system into their ESEA/ESSA "School-wide Program Plan," particularly when they are using ESEA/ESSA funds to implement school-wide programming.

What all of this means is: that schools and districts need to complete a formal strategic planning and needs assessment process, involving school and support staff, parents, and students, that results in a multi-tier system of supports that targets (a) their own students'' needs; (b) the local resources, strategies, and professional development required to meet all of their students' needs; including (c) their academic and non-academic needs and outcomes.

Said a different way: Schools and districts need to create a personalized system to fit their student goals and needs, rather than adopt an external system that forces their student goals and needs into THAT system.

The "bottom line" is that all districts and schools need to understand what is in the federal law, and what is not. Moreover, they need to make sure that they have the science-to-practice technical assistance available to them so that they can independently evaluate others' multi-tiered approaches. . . or so that they can create the best one that best fits their own students.

(For more, Dr. Knoff refers you to three of his blogs

> http://improvingourschools.blogspot.com/2017/01/esea-essa-tells-schools-and-districts-to-build-their-ownmulti-tier-system.html

> http://improvingourschools.blogspot.com/2017/10/improving-student-outcomes-when-your-state-departmentof-education-adopts-failed-MTSS-RtI-PBIS-frameworks.html

> http://improvingourschools.blogspot.com/2017/10/improving-student-outcomes-when-your-state-departmentof-education-adopts-failed-MTSS-and-PBIS-approaches-Part-II.html)

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We were extremely pleased to receive to have facilitated the perspectives exchanged in this open discussion. We are sharing these views widely to stimulate further exchanges. Our hope is that the above exchange will lead not only to further discussion, but an evolution in thinking about MTSS and in policy for transforming how schools address barriers to learning and teaching and re-engage disconnected students and families.

As always, we invite your comments. Send to Ltaylor@ucla/edu .

## Earlier Analyses of MTSS by the Center:

>*ESSA State Consolidated Plans: Rethinking MTSS to Better Address Barriers to Learning*
    http://smhp.psych.ucla.edu/pdfdocs/essamtss.pdf
>*Moving Beyond the Three Tier Intervention Pyramid Toward a Comprehensive Framework for Student and Learning Supports* http://smhp.psych.ucla.edu/pdfdocs/briefs/threetier.pdf

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About Transforming How Schools Address Barriers to Learning and Teaching

Based on our research, the National Initiative for Transforming Student and Learning Supports recognizes that effective implementation, replication to scale, and sustainability of a design for transforming learning and student supports calls for addressing a set of four interconnected concerns. These involve:
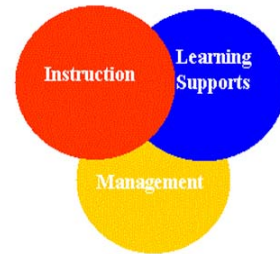
- •Expanding the policy framework for school improvement to fully integrate, as primary and essential, a student and learning supports component.

- •Reframing student and learning support interventions to create a unified, comprehensive, and equitable system of learning supports in classrooms and school-wide and across all schools in a district.

- •Reworking the operational infrastructure to ensure effective daily implementation and ongoing development of a unified, comprehensive, and equitable system for addressing barriers to learning and teaching.

- •Enhancing approaches for systemic change in ways that ensure effective implementation, replication to scale, and sustainability.

Prototype frameworks for each of these concerns have been developed. You can obtain a quick overview from our policy and practice notes entitled:
    Evolving School Improvement Planning for Addressing Barriers to Learning and Teaching
        http://smhp.psych.ucla.edu/pdfdocs/evolving.pdf

More in-depth presentations and details are available in our two most recent books:
- • *Addressing Barriers to Learning: In the Classroom and Schoolwide*
    available for free at this time -- download from the link on the Center's homepage –
        http://smhp.psych.ucla.edu/
and
- • the just published *Transforming Student and Learning Supports: Developing a Unified, Comprehensive, and Equitable System* –
    https://titles.cognella.com/transforming-student -and learning -supports -9781516512782.html

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Also see, *ESSA and Addressing Barriers to Learning and Teaching:*
        Is there Movement toward Transforming Student/Learning Supports?
            http://smhp.psych.ucla.edu/pdfdocs/2018%20report.pdf