Concerns about MTSS Initiatives

As a framework for preventing and addressing behavior and learning problems, the Every Student Succeeds Act (ESSA) offered a school-wide *tiered* model (also referred to as a multi-tier system of supports). The tiered model is a carryover from previous federal policy guidelines related to "Response to Intervention" (RTI) and "Positive Behavioral Interventions and Supports (PBIS)." Federal guidelines note that the tiered model is to be coordinated with similar activities and services carried out under the Individuals with Disabilities Education Act. One result has been that states, districts, and schools increasingly are framing student and learning supports in terms of tiers or levels, with the framework referred to widely as MTSS.

In ESSA, 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." As defined by the I-MTSS Research Network (2024) I-MTSS is "a comprehensive and equitable prevention framework for improving the outcomes of all students, including students with or at-risk for disabilities, through integrated academic and behavioral support." Essentially, MTSS is an effort to place student and learning supports into an intervention continuum framework that emphasizes primary, secondary, and tertiary prevention.

With increasing adoption of some form of a multi-tiered system of support framework, significant concerns have been reported. This brief summarizes common concerns, discusses the limitations of prevailing improvement recommendations, and highlights new directions.

Common Concerns

Conceptual confusion

The Wisconsin RTI Center (Lenz, 2025) indicates that, across states and districts, MTSS is frequently conflated with Response to Intervention (RTI). The report stresses that this can narrow implementation to tiered academic interventions and deemphasize the need for a broad system of student and learning supports. From the Wisconsin Center's perspective, RTI is best understood as a component within an MTSS whole school framework that integrates academic and behavioral supports (often including PBIS). More generally, critics have called for guidance that details MTSS (e.g., leadership for the process, decision rules, data integration, coaching), and cautions against allowing MTSS to default into just implementing RTI and PBIS (Braun, 2020; I-MTSS Research Network, 2024; Lenz, 2025; Simonsen, Coyne, & Goodman, 2024).

> *Lack of shared clarity and practical guidance diminishes educator buy in, trust, and fidelity to implementation*

Frameworks often stall at concepts and diagrams

Capacity building is insufficient

The I-MTSS Research Network reports a tendency for districts and schools to stall after adopting a diagram and plan. To move forward, the Network calls for building adult capacity that includes integrated teaming, data, and coaching. In building capacity for implementation, however, researchers have noted that educators often lack clarity about practices for each tier and have had too little operational guidance for daily implementation (Adelman & Taylor, 2025; Braun, 2020; Cook. 2025). Capacity building also has been too limited for effectively pursuing replication to scale and sustainability (Adelman & Taylor, 2024).

Fragmented & siloed implementation	Districts frequently roll out MTSS in unintegrated ways (e.g., separate initiatives for academics, behavior, SEL) (Cook 2025, Durrance, 2025). Such fragmentation produces confusion, works against buy in, reduces coherence, creates inequities, and limits impact. Furthermore, it contributes to counterproductive competition for sparse resources (Adelman & Taylor, 2025; Jackson, 2021; Pacheco & Witte, 2020).
Resource & capacity constraints	Schools report limited capacity as a major barrier to effective implementation (e.g., insufficient budgets, staffing, planning time, professional learning). At secondary schools, structural hurdles such as class schedules complicate providing a full continuum of supports (Durrance, 2025; Wiggins, 2023).
Marginalization of student/learning supports	Our Center has stressed that many of the MTSS implementation problems are due to the ongoing marginalization of student/learning supports in school improvement policy. The lack of a high priority buy in has hindered efforts to unify such supports and develop them into a comprehensive and equitable system for addressing barriers to learning and reengaging disconnected students (Adelman & Taylor, 2025).

MTSS as formulated in many school improvement plans is little more than a description of the levels of a simplified continuum of intervention. The simplicity of the tiered presentation is appealing, and the framework does help underscore differences in levels of intervention. However, as widely portrayed in school improvement plans,

- MTSS is an inadequate depiction of a continuum of student/learning supports. That is, it simply delineates levels of school interventions, rather than addressing each level as a subsystem that connects school and 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 embeds such practices as response to intervention).
- It does not systematically organize across the continuum the interventions schools pursue each day to address learning, behavior, and emotional problems.

As a result of these limitations, most adoptions of MTSS in school improvement plans do little to guide better directions for addressing barriers to learning and teaching.

Building on MTSS to Improve Student/Learning Supports

Recommendations have focused on doing more to directly improve MTSS (e.g., enhance conceptual clarity, adapt to context, designate leadership, build capacity, guide implementation). The implication is that MTSS is a sufficient framework and just needs improving.

Our analyses indicate that MTSS cannot deliver on its promise because (1) school improvement policy marginalizes all student support efforts and (2) more is involved in building a truly comprehensive system of student/learning supports than the emphasis on a continuum of interventions (Adelman & Taylor, 2020, 2025).

About Expanding School Improvement Policy & Practice

Current school improvement policy and practices primarily are guided by a two-component framework – namely a framework emphasizing ways to improve (a) instruction and (b) governance/management. Interventions for addressing barriers to learning and reengaging disconnected students are given secondary consideration at best. It cannot be emphasized enough that this marginalization is a fundamental cause of the widely observed fragmentation and disorganization of student and learning supports.

If schools are to effectively address students' learning, behavior, and emotional problems, policy makers must expand school improvement policy from a two- to a three-component framework. The third component – designed to directly address barriers to learning and teaching – must be given the same priority as the other two.

Evolving the MTSS Framework

Few will argue against conceiving a continuum of intervention as a starting point for framing the nature and scope of student and learning supports. However, how MTSS usually is portrayed is not a powerful way to depict the continuum, and it is an insufficient framework for organizing student/learning supports.

For a continuum of interventions to guide significant school improvements, each level needs to be evolved into an integrated set of subsystems that weaves together existing school and community resources that address common concerns.

But framing a continuum is not enough. The many fragmented activities going on at each subsystem level have to be organized into a delimited set of domains of support that reflect the major daily efforts that schools make to address barriers to learning and teaching. (Our approach organizes interventions into six domains of support and maps them across the continuum.)

> Combining the continuum and organizing interventions into a delimited set of domains provides a unified framework that has been used by states, districts, and schools in mapping existing efforts and planning how to develop a unified, comprehensive, and equitable system of student/learning supports (Adelman & Taylor, 2020, 2022).

Concluding Comments

MTSS offers a starting point for improving how schools address students' learning, behavior, and emotional needs. But it is an insufficient framework for transforming student/learning supports to better address barriers to learning and teaching, reduce the opportunity gap, and improve outcomes for all students. Moving forward calls for expanding policy and evolving MTSS into a unified, comprehensive, and equitable system.

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