



Office of Superintendent of Public Instruction
Chris Reykdal, State Superintendent

*All students prepared
for post-secondary pathways,
careers, & civic engagement.*

REPORT TO THE LEGISLATURE

UPDATE: Safety Net Survey

2019

Authorizing legislation: [RCW 28A.150.392](#)

Glenna Gallo

Assistant Superintendent of Special Education Services

Prepared by:

- **Amber O'Donnell**, Safety Net Administrative Program Specialist
amber.odonnell@k12.wa.us | 360-725-6075

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Executive Summary

Safety Net funding is available to local education agencies (LEAs) that demonstrate need for additional special education funding. Applicants must show need beyond state and federal funding already available to the LEA. More background on the Safety Net program is included in the [2014–15 Safety Net Survey report](#).

The Legislature requires the Office of Superintendent of Public Instruction (OSPI) to annually survey LEAs about their satisfaction with the Safety Net process. The survey is used to consider feedback from LEAs to improve the Safety Net process. More than 360 people from LEAs that applied for Safety Net received the survey in September 2019. The survey included 13 questions and was open for two weeks. OSPI received 72 responses.

Background

There are two types of Safety Net funding—High-Need Individual and Community Impact. High-Need funding is on behalf of an individual student. Community Impact funding is for a factor that impacts the district as a whole. The Office of Superintendent of Public Instruction (OSPI) provides a [bulletin](#), instructions, and application forms each school year. OSPI provided professional development at all nine educational service districts (ESDs) prior to the initial 2018–19 submission date. The Safety Net Oversight Committee awards funding to applicants.

The Committee has awarded more than \$638 million since the program’s beginning in 1996–97. In 2018–19, the Committee awarded funding to 112 local education agencies (LEAs). These included:

- 108 school districts,
- 1 educational service agency (ESA),
- the Washington State Center for Deaf and Hard of Hearing Youth (CDHY), and
- 2 charter schools.

The Committee awarded funding for:

1. 3,308 High-Need Individual applications, totaling \$75,708,736.
2. 8 Community Impact applications, totaling \$2,687,293.

Of the 125 LEAs that applied, 13 did not receive Safety Net funding.

Update Status

Respondents rated nine of the 13 questions on a scale of 1 to 5, with 1 being the lowest and 5 the highest. Depending on the question, the lowest response was either ‘not helpful’ or ‘disagree.’ The highest response was either ‘helpful’ or ‘agree.’ ‘Not applicable’ was an available selection for eight of the questions. One question was a yes or no answer and three questions were open ended. Survey responses were anonymous.

Survey Changes

The following questions were removed from the survey this year:

- The Individualized Education Program (IEP) Review Form was a helpful tool in submitting the Safety Net applications.
- Being able to electronically submit my Safety Net application will be helpful to me.

The following question additions were made to the survey this year:

- Please list helpful tools or supports that were available or provided to your LEA.
- Please rate the helpfulness of the following changes:
 - Redaction no longer required
 - Electronic submission
 - Sampling IEPs for review
 - Targeted areas for IEP review
 - Ability to submit additional paperwork/clarification when requested
 - Attending the Safety Net meeting via Zoom
 - June award letter and backup documentation—including any Worksheet Cs for applications with fiscal adjustments—uploaded to the secure file transfer protocol site

One question about training also was modified to include examples of the training provided by OSPI.

Survey Responses

Four of the 13 survey questions had an average response below 4.0. This is an improvement from the previous year where seven questions had an average response below 4.0. The questions were:

- The training provided by OSPI for the 2018–19 Safety Net process was helpful.
- The Safety Net website includes information that is helpful to my LEA in the Safety Net application process.
- My LEA's IEPs have improved as a result of the Safety Net process.
- Although I may not always agree with the results, I believe the Safety Net standards are uniformly applied to all LEAs.

In the written comments, respondents said the process could be improved by:

- Focusing less on IEP compliance
- Providing August award information earlier
- Prorating applications when there are IEP issues
- Providing more information on the sampling process
- Lowering the threshold
- Providing application forms earlier
- Providing more training
- Providing more information on application adjustments

Table 1: Average Response by Question

Question	Average Response
Q1. The 2018–19 Safety Net Bulletin—which outlined the process changes, application criteria, and submission deadlines—was clear.	4.11
Q3. The training provided by OSPI for the 2018–19 Safety Net process was helpful.	3.91
Q4. The Safety Net website includes information that is helpful to my LEA in the Safety Net application process.	3.93
Q5. OSPI staff members are helpful to my LEA in the Safety Net application process.	4.55
Q7. The Safety Net committee carefully considers my LEA's requests for Safety Net funding.	4.12
Q8. Although I may not always agree with the results, I was informed why my Safety Net applications were or were not funded.	4.35
Q10. My LEA's IEPs have improved as a result of the Safety Net process.	3.74
Q11. Although I may not always agree with the results, I believe the Safety Net standards are uniformly applied to all LEAs.	3.82
Q12. Please rate the helpfulness of the following changes:	
a. Redaction no longer required	4.80
b. Electronic submission	4.71
c. Sampling IEPs for review	4.26
d. Targeted areas for IEP review	4.21
e. Ability to submit additional paperwork/clarification when requested	4.70
f. Attending the Safety Net meeting via Zoom	4.23
g. June award letter and backup documentation—including any Worksheet Cs for applications with fiscal adjustments—uploaded to the secure file transfer protocol site	4.34

Source: 2018–19 Safety Net Survey results.

Follow-up from Workgroup Recommendations

[House Bill 2242, Sec. 408 \(2017\)](#) directed the Office of Superintendent of Public Instruction (OSPI) to review and make recommendations of possible adjustments to improve the Safety Net process. The study was performed by a workgroup of 21 individuals who met multiple times during the 2017–18 school year. The [Special Education Safety Net Study Report](#) was submitted to the Legislature on November 1, 2018.

The workgroup recommended examining nonpublic agency (NPA) placement data as an area for further review. The table below contains data for out-of-district placements by placement type for the past three years. The data show the percentage of applications funded through Safety Net for out-of-district placements has remained relatively stable; however, the number of applications has increased each year, as have the costs. Increased efforts through the [Inclusionary Practices Professional Development Project](#) may reduce the out-of-district placements.

Table 2: Out-of-District Placements

Type of Placement	Total Awarded for Out-of-District Placement*	Number of Applications	Percent of Applications
2018–19			
ESD program	\$8,673,037	151	4.6%
<i>In state NPA</i>	\$28,671,373	450	13.6%
<i>Out of state NPA</i>	\$6,814,960	45	1.4%
School district	\$9,288,925	186	5.6%
Total	\$53,448,295	832	25.2%
2017–18			
ESD program	\$7,876,864	154	5.5%
<i>In state NPA</i>	\$23,174,917	424	15.2%
<i>Out of state NPA</i>	\$4,601,656	35	1.3%
School district	\$6,736,752	141	5.0%
Total	\$42,390,189	754	27.0%
2016–17			
ESD program	\$6,647,396	152	6.0%
<i>In state NPA</i>	\$19,293,783	359	14.2%
<i>Out of state NPA</i>	\$2,774,320	22	0.9%
School district	\$6,473,174	141	5.6%
Total	\$35,188,673	674	26.6%

Source: Safety Net database.

*Please note the total awarded for the out-of-district placement types is the cost before threshold deduction.

Conclusion and Next Steps

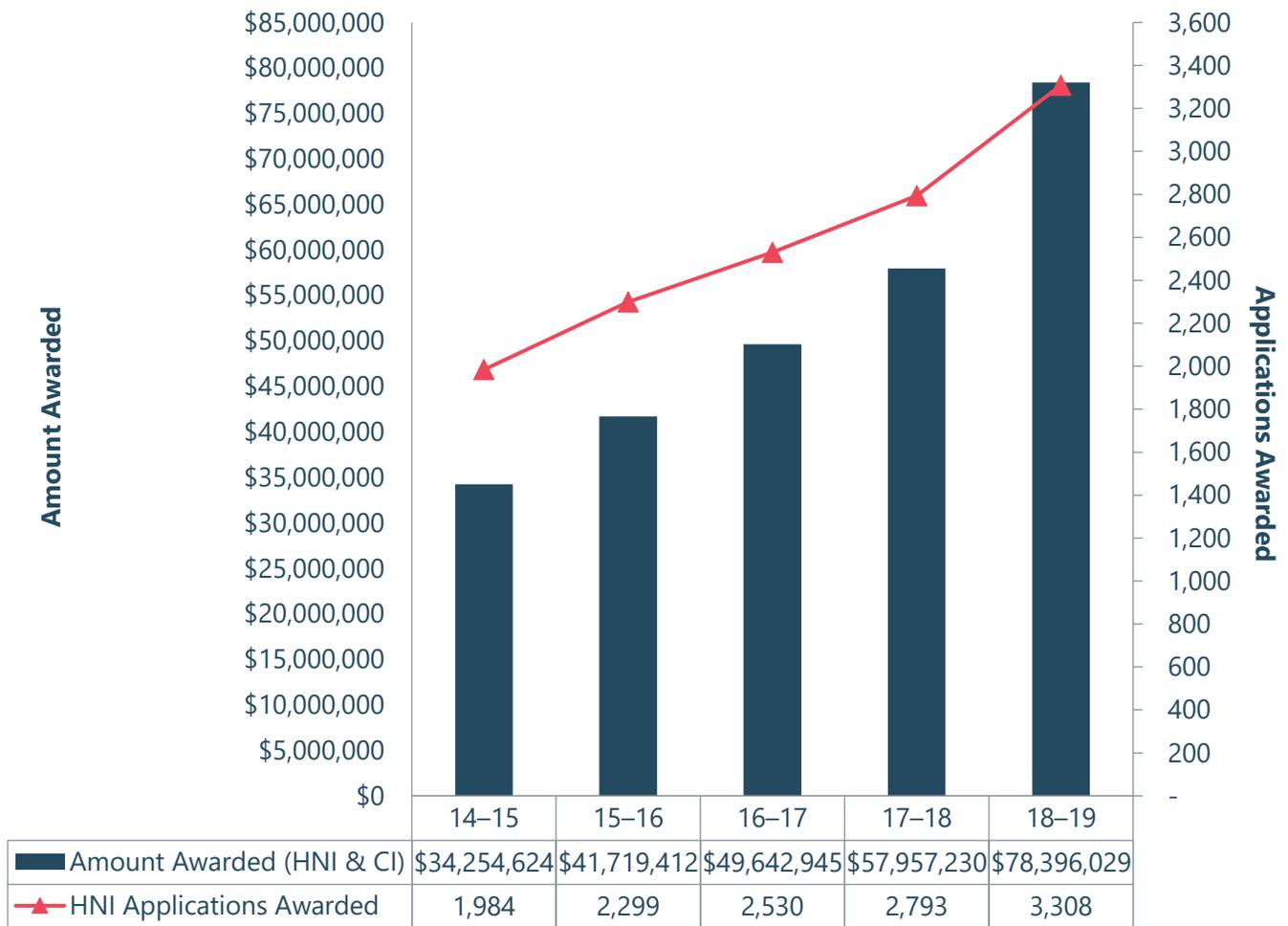
The [Safety Net Bulletin](#) released by the Office of Superintendent of Public Instruction (OSPI) on September 30, 2019 outlines the process for the 2019–20 school year. This is the earliest the bulletin has been released in recent years. Improvements to Safety Net forms were released at the beginning of November. Increased staff will allow for more training opportunities, including mini-tutorial videos and more one-on-one technical assistance to LEAs. Additionally, the threshold was reduced by \$2,000, applications will be prorated when individualized education program (IEP) noncompliance is identified, and OSPI continues work on an application platform.

APPENDICES

Appendix A: Safety Net Funding Results

In 2018–19, the State Safety Net Committee approved 112 local education agencies for Safety Net funding. The Committee awarded 3,308 High-Need Individual student applications and 8 Community Impact applications for a total of \$78,396,029.

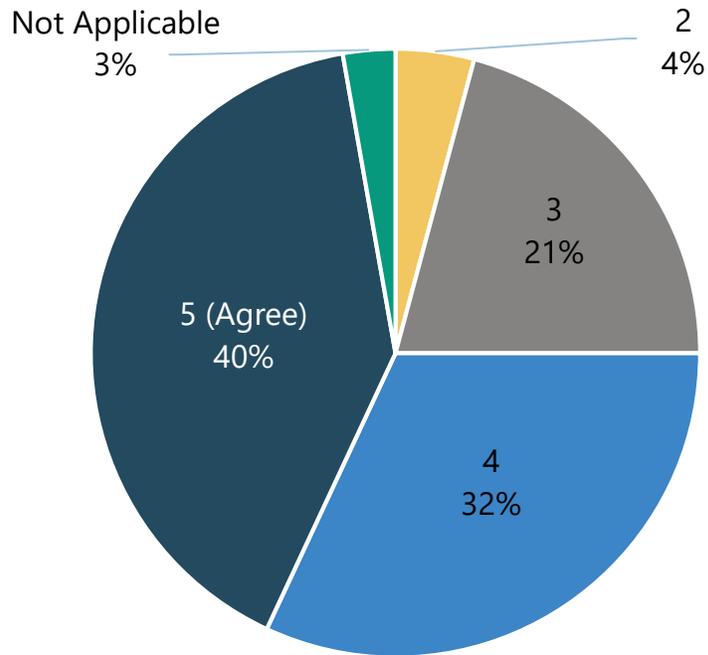
Figure 1: Safety Net Funding 2014–15 through 2018–19



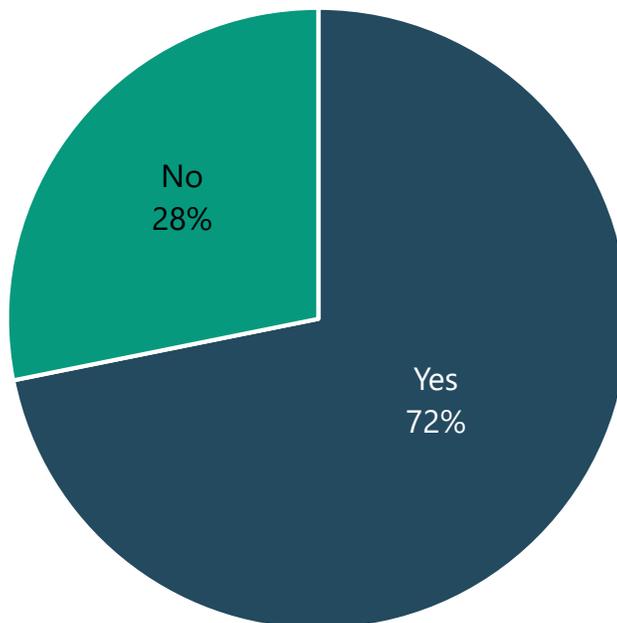
Source: Safety Net Database.

Appendix B: Safety Net Survey Results

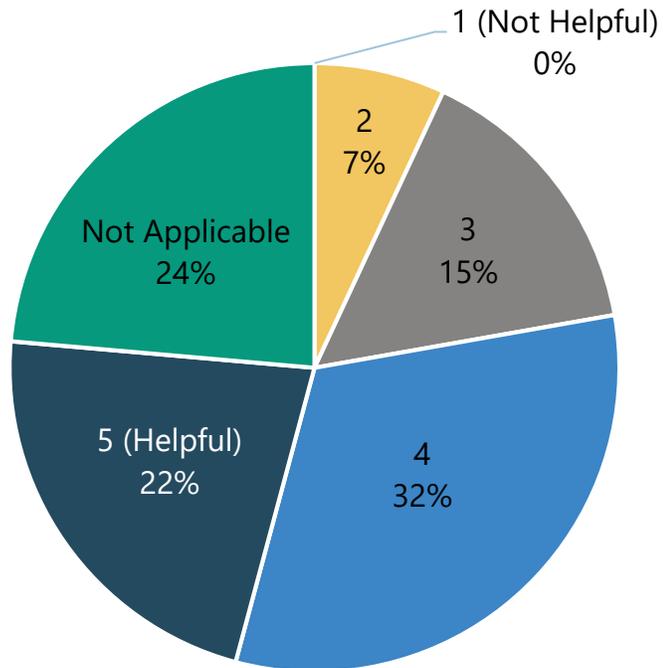
1. The 2018–19 Safety Net Bulletin—which outlined the process changes, application criteria, and submission deadlines—was clear.



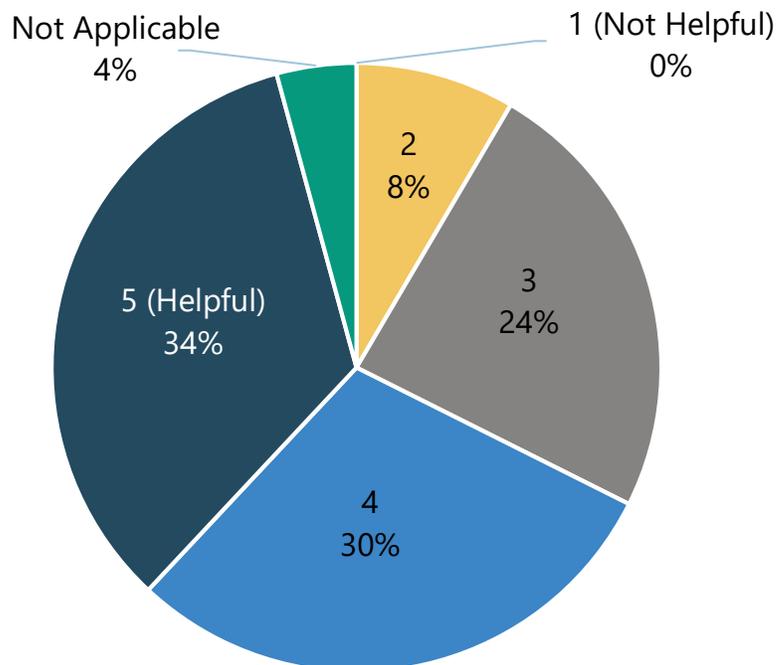
2. Did you utilize training provided by OSPI—such as in person trainings, Zoom meetings, webinars, or training videos—for the 2018–19 Safety Net process?



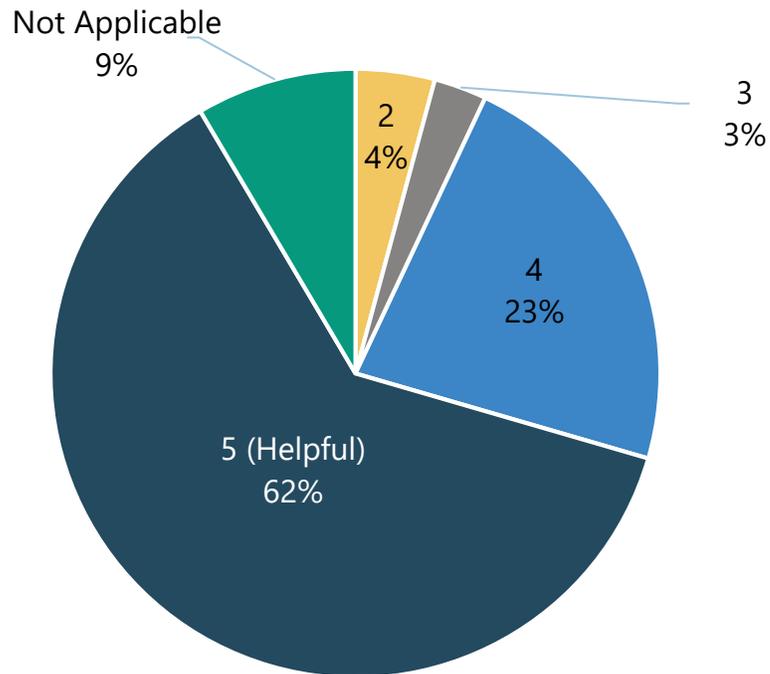
3. The training provided by OSPI for the 2018–19 Safety Net process was helpful.



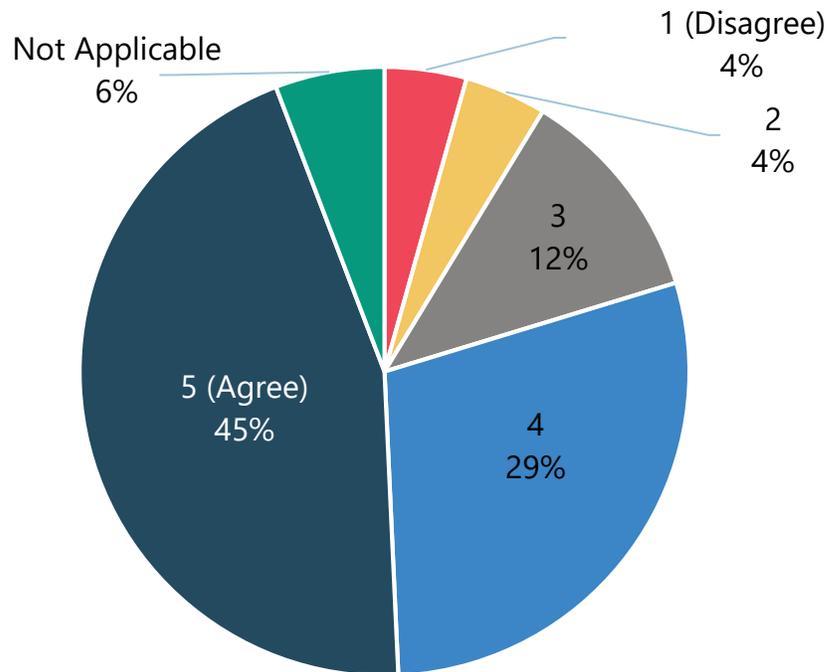
4. The Safety Net website includes information that is helpful to my LEA in the Safety Net application process.



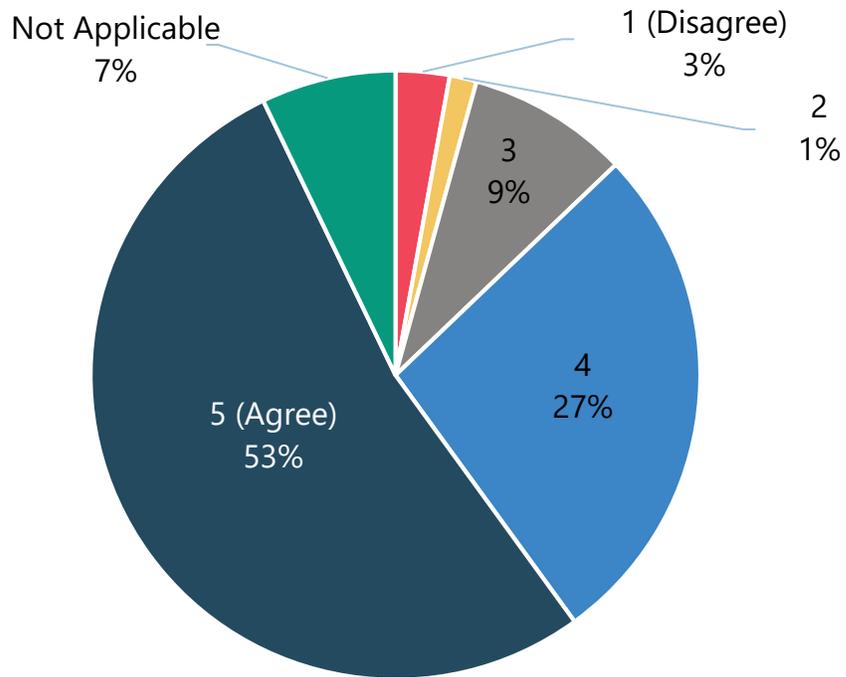
5. OSPI staff members are helpful to my LEA in the Safety Net application process.



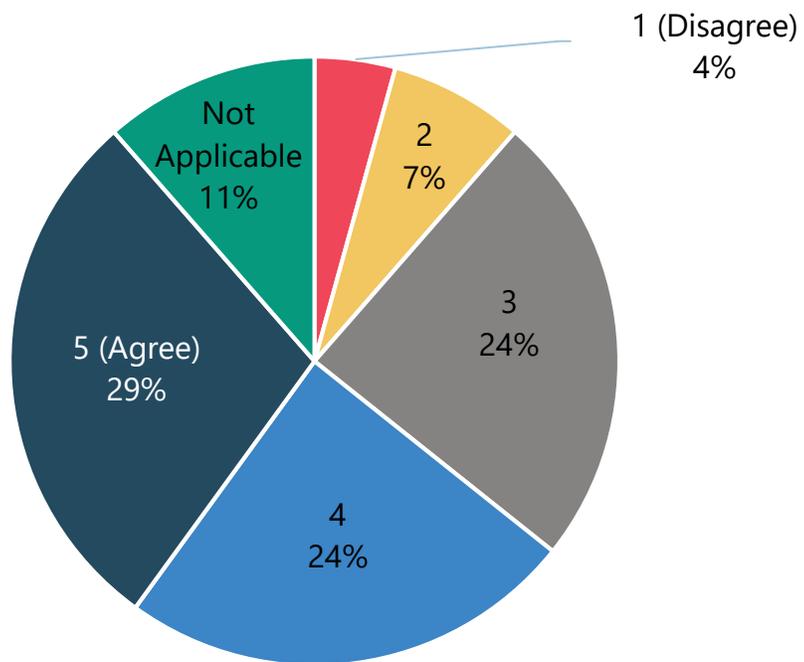
7. The Safety Net committee carefully considers my LEA's requests for Safety Net funding.



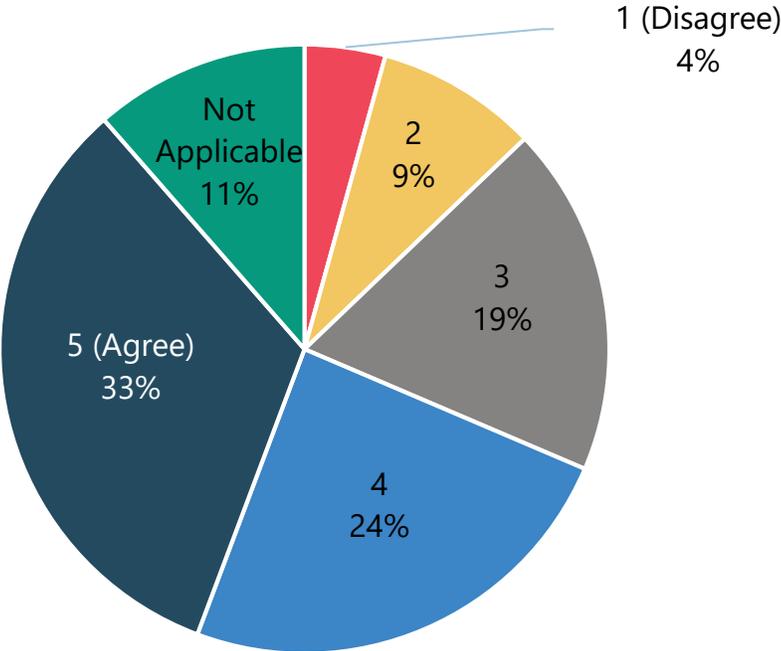
8. Although I may not always agree with the results, I was informed why my Safety Net applications were or were not funded.



10. My LEA's IEPs have improved as a result of the Safety Net process.

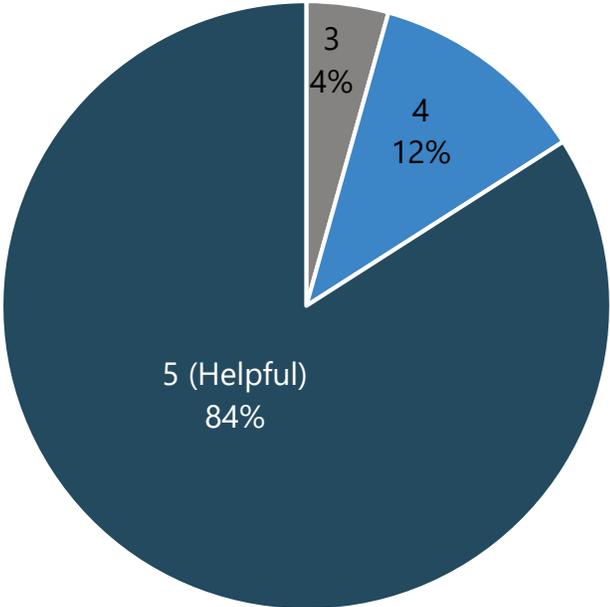


11. Although I may not always agree with the results, I believe the Safety Net standards are uniformly applied to all LEAs.

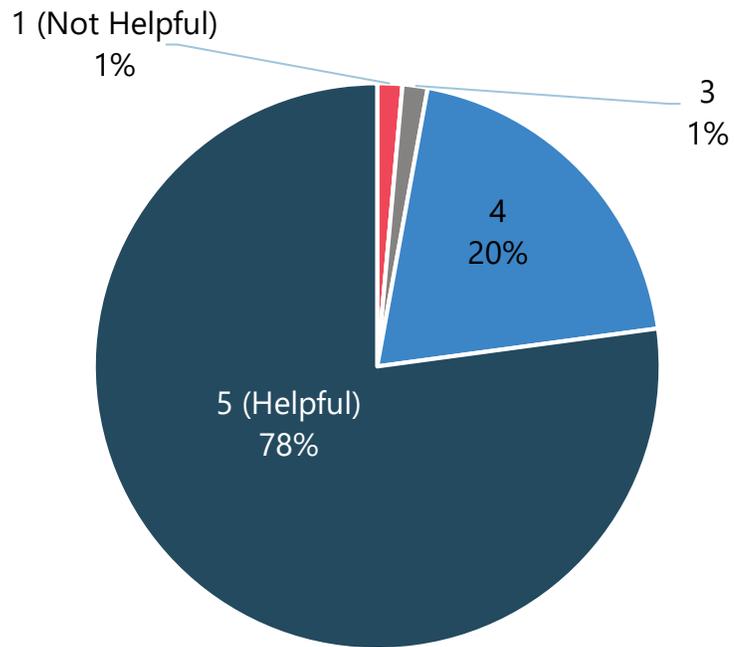


12. Rate the helpfulness of the following change:

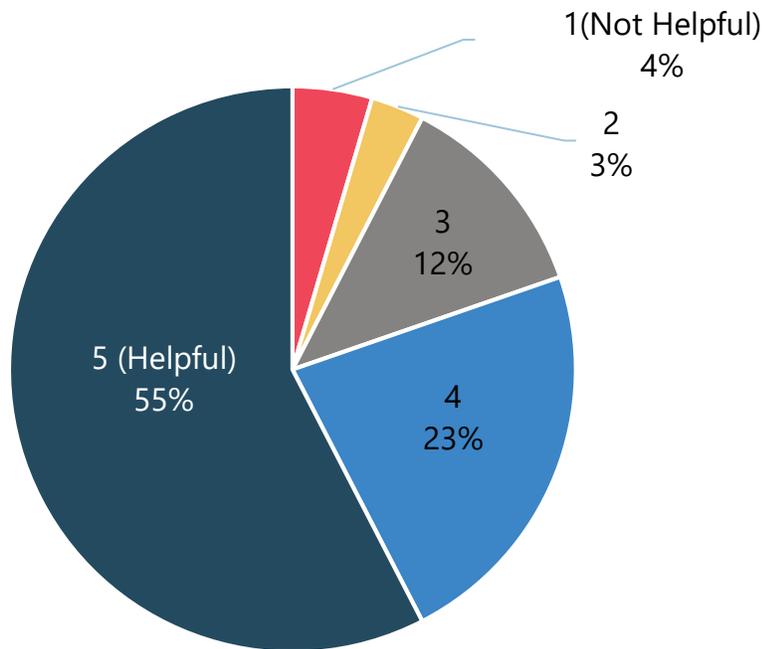
a. Redaction no longer required



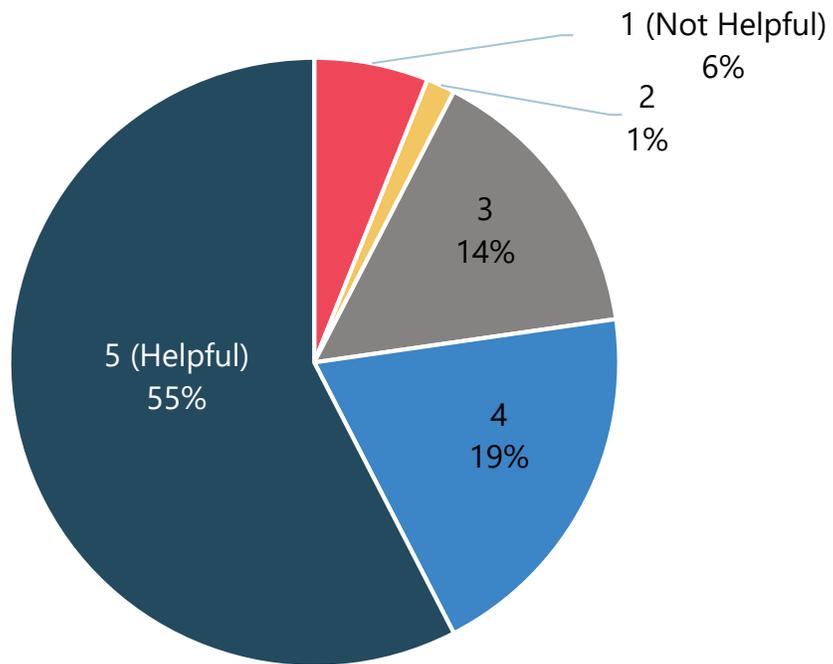
b. Electronic Submission



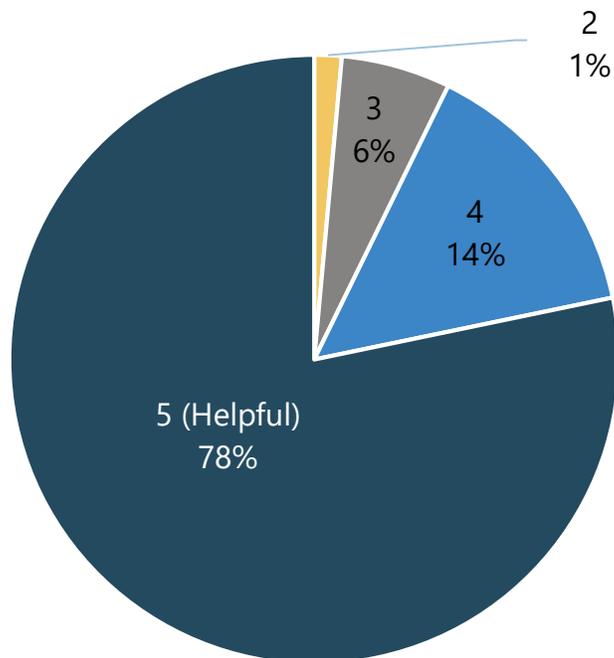
c. Sampling IEPs for review



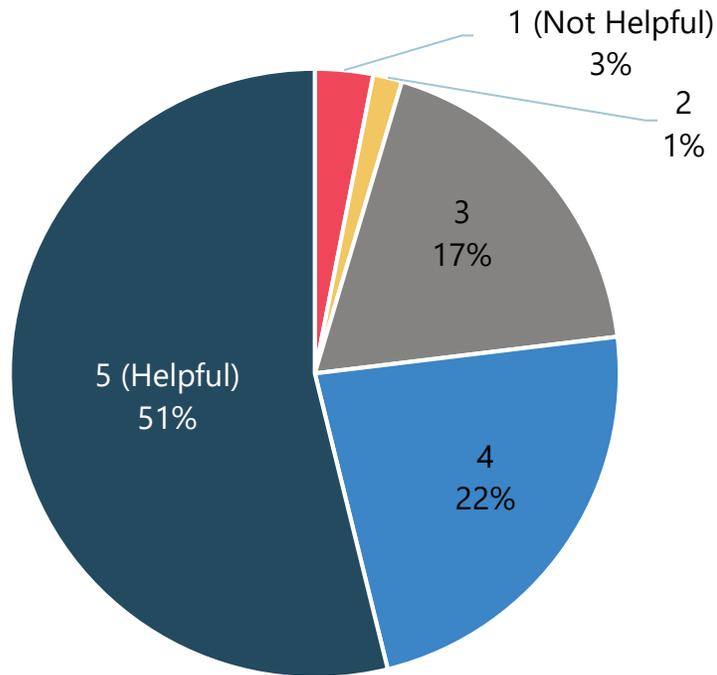
d. Targeted areas for IEP review



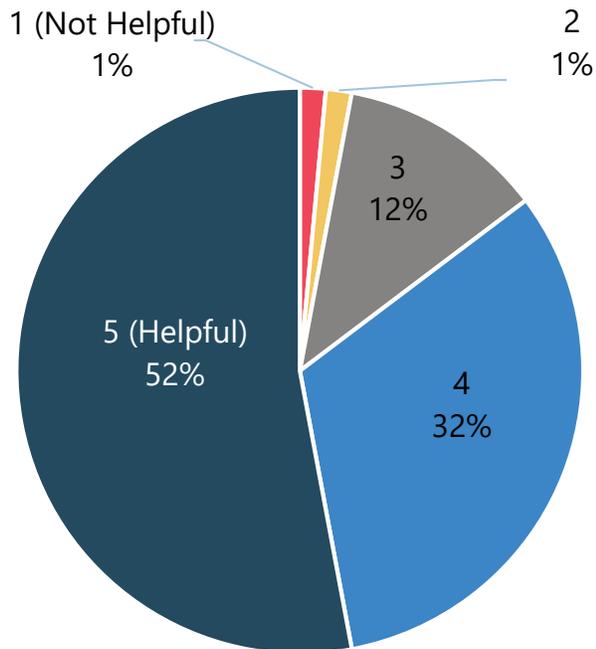
e. Ability to submit additional paperwork/clarification when requested



f. Attending the Safety Net meeting via Zoom



g. June award letter and backup documentation—including any Worksheet Cs for applications with fiscal adjustments—uploaded to the secure file transfer protocol site



Appendix C: Safety Net Survey Comments

Table 3: Survey Question 6

Please provide an example for question 5.
Responsive to questions about the process and criteria.
When we emailed a specific question we received a prompt and thorough response.
Responsive to questions; provide clarifications.
When we asked for clarification we would comply with recommendations, yet the outcomes still resulted in denial in the review process.
We had occasion to ask for clarification on more than one point. Amber was always responsive and helpful.
I made a couple of calls to OSPI with specific questions about Safety Net forms and they returned my phone calls promptly and were able to go through the process with me.
Each time I called for help, I was able to get a specific response which helped me to move through the Safety Net process.
We had a question on filling out the budget attachments and were answered promptly.
We couldn't have finished it without Amber's help. There needs to be a beginner's manual. I attended the webinars and read the bulletins, but when you are doing it for the first time, it is complicated.
OSPI staff members always return calls and emails in a timely fashion and assist in answering questions in a supportive way.
Staff helped us to understand the different timelines and requisite actions for each.
Respond to questions via email; Provide technical support; Problem-solve; Provide clarification.
All my questions were welcomed and answered timely.
When calling, OSPI staff try to explain procedures. (Back to a prior question, I was not aware that training webinars for Safety Net exist.)
Questions were always answered promptly and with a customer service attitude.
Available to answer questions as needed.
Very responsive to questions from our staff.
When called, they provided clarity on what needed to be submitted as part of an individual student's folder versus contracts that may be submitted as part of a district folder.
Ready to answer any questions we had regarding SN. Appreciate OSPI timeliness as well.
Quick to respond to emails/phone calls.
The staff always takes my call!
Responding to clarifying questions.
When we were not sure - we called. When we called we received prompt attention and answers to our questions.

Please provide an example for question 5.
We had a new admin assistant that was helping the sped director. We had several questions that were promptly answered.
Participated in WISM this year and that team advised us on Safety Net process.
I've always appreciated email responses from Amber.
Have to clarify a number of issues as claiming reimbursement for each extra area adds complexity. We have to call often.
Promptly answering concerns.
Amber was amazingly helpful and kind as I muddled my way through my first Safety Net.
This year was difficult with the change in staff at OSPI. The guidance and instructions were not as helpful as they could have been. Since staff were newer, it was difficult to get good clarification. I believe next year will be smoother given the consistency in staff.
Amber rocks, always very helpful and responsive to questions! Thank you!
Followed up with staff to ensure that we had updated data.
I worked with Mary Ellen Parish a little and then with Amber O'Donnell. Mary Ellen was great to work with and then Amber O'Donnell continued her approach of being a service to school districts. They went above and beyond to take time to answer my questions. I appreciate their knowledge and, more importantly, their professionalism and hard work.
Very quick responses to emails.
Answered emails and phone calls.
I was able to understand Worksheet A working with Amber.
All of our questions were answered quickly.
When I emailed questions I received a response within a couple of days.
If OSPI is called they will find someone to help you.
This year the Safety Net staff members were much more open to discussing fiscal and IEP exceptions and accepting clarifying information.
We have had questions on transportation and contracts for out of District placements and received a timely response.
They are always willing to answer questions.
I called with several questions and they were answered very quickly. Everyone was patient.
We did not have any questions.
They answered questions when I called!
My office professional was able to contact OSPI for clarifying questions and feels comfortable doing so.
Amber O'Donnell often made herself accessible. She helped test the FTP process for us, then watched as our documents came in.
The staff replies quickly and accurately.
Our application for Safety Net was denied for 2018-19.
Respond promptly to emails.

Please provide an example for question 5.
Our fiscal supervisor was always able to contact OSPI staff to provide clarification.
Questions are answered clearly and timely.
Amber is willing to answer questions and send tentative information to keep Districts informed for budgeting purposes.

Table 4: Survey Question 9

Please list helpful tools or supports that were available or provided to your LEA.
SEAC representative, Tammie Jensen-Tabor...very knowledgeable and helpful.
ESD meeting phone call and email responses to specific questions improved worksheets.
The reasons did not clearly match our assessment of submitted documents.
Website, online training.
I appreciated the feedback form explaining why the two of our IEPs were not acceptable, but it was not clear. I am going to ask my OESD SPED Director to explain it to me so I can learn from our mistakes.
Submitting online was a time saver especially with no redactions:)
Bulletin, webinar, office support, website.
The feedback provided on the IEP review worksheet.
Reasons for not full funding. Opportunity to address the reasonings.
Website and forms.
IEP review form.
Regarding the errors with the IEPs I generally understand but some of the adjustments that the committee make on the financial aspects of the application don't seem clear. When we ask clarifying questions on that we don't get clear answers.
The workbook is well designed.
Bulletins.
We liked getting the copy of results before the actual meeting to follow along with results and items in question.
The Worksheet C excel spreadsheet is just awesome!
Understanding how capacity is determined.
We had lots of questions regarding snow days that were answered.
The reconsideration feature was used successfully.
Trainings - LEA support - OSPI.
Specific information about why it was not funded.
Mainly the in-person option to hear why students were funded or not. Notes on Safety Net files were helpful.
Just having someone to contact is great.
Our application for the 2018-19 Safety Net was declined.

Table 5: Survey Question 13

Please list additional ways in which you think the safety net process can be improved.
Criteria still seems more focused on IEP compliance (sometimes petty compliance issues) than the nature of high need/high cost student programs. This prioritization order needs to be more balanced.
The communication given was that the process would no longer remove all funding for minor corrections. This was not represented in the results. Districts are struggling to fund special education services based on the current funding model, Safety Net unfortunately has become a critical component to districts being able to serve students. It would be beneficial if it felt less like a lottery process.
Worksheet A available earlier to project capacity and IEP workload.
The process produces inequities for smaller districts. The process is so complicated that we have to hire consultants to help us in the process. Even with this amount of support we were not successful in our submissions. Experts outside of the Safety Net program have indicated to us that something doesn't seem right about the denials we have received. The result is our kids suffer from lack of resources.
I observed some of the meeting and it seemed that, though the number of areas scrutinized were reduced, the actual review of these areas was much more brutal - IEPs not funded for completely non-substantive reasons (e.g., independent living goals that were not clear about the skills, or "clumping" of services). None of these reasons contributed to lack of clarify about what services the student was getting in what quantity. I spoke with some other directors who had attended in person or via zoom following the June meeting and a number of us were stunned by the harshness of the reviews. To put this in more positive terms, I can say that the process can be improved by allowing the reviewers to limit their review to one that establishes that the IEP is basically sound (e.g., the goals are supported by the PLEP and the services directly related to the goals), and all appropriate related documentation is in place. I imagine the reviewers too would be relieved...I very much doubt they enjoy playing bad cop.
Once funds are awarded, they are split state and federal. It is hard to splice out the activity/object of costs for the federal i-grant claim. We have to do a bunch of allocation calculations to figure it out. Hopefully, the federal portion will go away in the future.
I marked 5's above for those I had direct evidence for, but the others I do not know how the committee goes through the process. And somehow we thought we had signed up for the ZOOM meeting only to find out we hadn't and then couldn't since we missed a timeline.
For our students who were not funded or only partially funded, the explanations were sometimes insufficient to really understand why a deduction was made. More clarity in feedback would be helpful.

Please list additional ways in which you think the safety net process can be improved.

August information seemed to come out a little too late and would like it sooner.

OSPI has made many positive improvements...thank you! Lower threshold would be appreciated.

I really appreciated the changes this year. My hope is that OSPI will also initiate a pro-rating of fiscal reimbursement when errors are found instead of not funding the entire amount.

I appreciated the changes that were made to the process this year. It was more efficient to not have to redact and to provide electronic submissions. THANK YOU!

I would like more clarification when funds are not awarded because Worksheet A did not demonstrate capacity. Could there be a training for fiscal directors/business managers?

I and the admin assistant are both new to doing this process so it is difficult to know what has been approved. We felt that it is a very cumbersome job but felt we were supported by OSPI and the work was worth the award received. Thank you.

The use of "sampled" IEP reviews doesn't help districts at all, because we don't know which IEPs are being reviewed. This saves time only for OSPI. It was also implied early in the process that compliance errors may not lead to full funding loss for individual IEPs, but it turned out that we continue to use the same "all or nothing" grading system to determine if funding will be earned for each IEP. It would be better for IEPs to be funded based on the apparent validity of the need, rather than the care with which T's were crossed and I's were dotted. I still continue to be confused by the two-deadline system, it would be nice if the letter this year was more explicit about which types of cases can be submitted in the later Spring.

The area we lost funding for initially was for a developmental delay where we were told we had clustered services together. We hadn't at all, as it was clearly explained in the narrative section. This felt to me that it hadn't been reviewed. Mistakes happen, and I appreciate that this process exists, but it felt like \$23,000 warrants more review... very glad we got the money in the end. Thank you.

I didn't realize the award letter and backup were uploaded to a secure file. The letter made it's way to me via my supervisor and the superintendent's office.

I would love a "Safety Net for Dummies" document. Not just how to submit, but how do I get that information? The teachers/directors don't know what I need exactly and I don't understand enough to know what to ask of them. How do I calculate minutes? How do I determine concurrent services?

Worksheet C to be available in September. Waiting to do all the Worksheet C work is an overload to the staff from Dec to March. This really is year round work. Provide a calculator for invoices to be recorded monthly that is connected to worksheet C, this would help reduce adjustments. Lower the threshold. :)

Please list additional ways in which you think the safety net process can be improved.

It would be awesome if somehow the Medicaid info could be incorporated automatically into Worksheet C. It wasn't a huge deal but going between the documents was a bit cumbersome. I'm really impressed with how much OSPI has streamlined and helped the Safety Net process!

We were very happy to hear that districts could be contacted if they were missing paperwork but then learned that not everyone would call a district if something was missing. This seems like it should be the same for everyone - either the district is called to find out where a missing page/BIP/etc. is or not - it does not seem fair that some districts were given an opportunity to provide missing paperwork and others were not.

WISM and Safety Net have different expectations and it would be nice if they were the same.

I think there is so much focus on the Safety Net IEP, the other IEPs suffer.

Please make sure that expenditures and revenue are viewed on the same month. Transportation contracts with outside agencies should be funded for their total not at the state mileage per diem.

I didn't see information in my process about how the sampling and targeted areas worked.

I was unclear as to calculate minutes from the service matrix and minutes of service for the teacher. I tried my best as I thought I understood and asked the ESD to review and help. They declined.

The timing of when we receive the final award details (which I am not sure you can address) is not ideal. Too late in the year, requires previous year budget juggling at the same time we are trying to finalize the upcoming year budget.

Although I was able to attend in person, zoom would have been sufficient if we were further away. Smaller districts should not have a max on the reimbursable amount. It still takes away from our basic ed dollars hurting all students when we have high cost students.

I wonder if there are common clerical errors made that districts could be made aware of.

Our application for Safety Net for the 2018-19 school year was declined.

The final award for August grant submission was too late. If it were not for helpful people, we would not have been able to submit our large award until September. Please try to have this info to districts at least 5 days before August grants are due. Thank you.



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Chris Reykdal • State Superintendent
Office of Superintendent of Public Instruction
Old Capitol Building • P.O. Box 47200
Olympia, WA 98504-7200