

4/25/2025: KCC Testimony on RIS

Thank you for lending your hearts to us tonight. My name is Jesse Graf. I am the Regional Inclusive Services Program Administrator for South Coast ESD, and I represent the ten school districts of the South Coast, from Reedsport to Brookings-Harbor, and urge you to increase Regional Inclusive Services funding and pass SB 868.

Oregon ESDs are experiencing significant difficulties recruiting in-person specialists, such as occupational therapists, physical therapists, and teachers for the deaf and hard of hearing who are vital to ensuring that students with low-incidence disabilities receive the services they deserve and need to succeed.

Post-COVID-19, many professionals are reluctant to return to full-time, in-person roles due to health concerns, caseload sizes and management, and better compensation in the private sector. The result is a growing reliance on part time and virtual services, which are insufficient in meeting the individualized needs of our students. This gap in service delivery affects quality of education and places undue strain on our in-person staff, who must incur larger caseloads and perform additional duties, further compromising the services provided and student growth and achievement.

This recruitment challenge is compounded by a flawed funding model. Despite increasing numbers of students with low-incidence disabilities, per pupil funding for Regional Inclusive Services has declined over the past eight biennia, leaving us unable to attract and retain specialists we need. South Coast ESD currently has a caseload of 215 students with autism, yet we only have funding for two full-time Autism Specialists. This forces ESDs to provide less than adequate services, which undermines our students' ability to succeed in their PK-12 education and futures after high school.

We need increased funding for regional inclusive services and we must invest in higher education programs that prepare students for these vital specialist roles to create a sustainable pipeline of specialists who are prepared to serve our most vulnerable students.

Our students with disabilities are counting on us to provide them with the services they need and deserve to succeed. By investing to adequate service levels at approximately 121 million dollars, approximately 60 million dollars more compared to the Governor's Recommended Budget and ensuring that our funding model is responsive to the realities of today's educational landscape, we will give all students the opportunity to succeed. Your investment now will more than pay for itself by educating our youth and better preparing them to thrive as students and beyond.

I thank you for your time and consideration. I look forward to hearing of the passage of increased Regional Inclusive Services funding this upcoming biennium and experiencing the positive impacts its passage will bring to our students, education system, and communities.



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Oregon's South Coast Education Service District (SCESD) serves 10 school districts from Western Douglas County down the coast through Curry County to the Oregon-California border. Recently, SCESD has experienced increasing difficulties recruiting face-to-face/in-person related service specialists, including, but not limited to, occupational therapists (OTs), physical therapists, school psychologists, teachers of the deaf and hard of hearing (TDHH), and speech/language pathologists (SLPs). This letter of concerns aims to highlight contributing factors, the impact of such vacancies on student success, anecdotal findings from working with virtual/remote specialists on student access and success, and measures SCESD has taken in an effort to recruit face-to-face specialists. This letter will further pose recommendations and interventions for sustainable solutions to ensure student success.

Contributing Factors to Recruitment Hurdles

Work Environment Preferences: Workforce preferences have evolved since the onset of the COVID-19 pandemic, and professionals seem reluctant to return to full-time, face-to-face work environments. The American Psychological Association (APA) asserts that over 40% of workers report anxiety about in-person work due to ongoing safety and health concerns (APA, 2021). It is deeply felt around the nation that students with disabilities, who comprise approximately 14% of school-aged students (3-21 years old), demonstrated substantial learning losses during the course of the pandemic, particularly during virtual and online learning (U.S. DOE, 2023). It is difficult, and oftentimes impossible, to define contractor's work and monitor their work, leading to compromised quality of services and individualization for students receiving special services. Learning loss due to remote workers providing virtual support is not only an educational issue, but could become a disability and civil rights issue.

Contractor v. Employee Compensation: Typically, those employed directly by school districts earn less money per hour on average than contractors performing the same work for the same duration of time. On average, contractor rates in specialist areas are twenty percent higher than hourly rates earned by direct employees, notwithstanding the consideration of other benefits public sector employees benefit from, such as health insurance, union membership, and



retirement contributions (BLS, 2023). Agencies and recruiters who find contractors typically earn a small cut for finding a contractor, and contractors are paid their agreed-upon hourly rate. Because this is advantageous for those desiring to earn more and have more choice and flexibility in the work environment, it is increasingly common for people to enter contractor agreements with private providers instead of working as an organizational employee.

Education as a Less Popular Sector: Nationwide, a substantial decrease in the number of people entering education and education-related fields has been seen, and, based on trends, this decrease is anticipated to worsen. The National Center for Education Statistics has found that over the past ten years, enrollment in teacher preparation programs has been consistently declining (NCES, 2022). This decline is attributed to many factors: better work-life balance in other areas of employment, better pay in the private sector, better job security due to fears about 0-21 funding, and more.

Higher Education and Post-Secondary Programs in Specialist Areas

SCESD has taken many steps to address the lack of in-person applicants and hire in-person staff. Most vacant specialist positions have not received any applications, nor have prospective applicants begun applications for these positions. We have combed through every Oregon college catalog and created a table to clearly see which schools have programs in each of our specialist positions. There are no post-secondary institutions in Oregon that support coursework to lead to Teacher of the Deaf licensure. There are 4 post-secondary institutions with OT programs. Only 2 post-secondary institutions have school psychologist programs. 3 institutions have SLP programs, and only 1 institution has a SLPA program. Most graduates from contacted institutions have opted to enter the private sector or medical settings rather than education. Almost all graduates already had jobs secured through required internships.

Impact on SCESD and Student Services

As an ESD, it is increasingly challenging to provide equitable, rigorous, and deserved educational services to students. The aforementioned contributing factors have a direct negative impact on services delivered and student learning outcomes. Unfilled specialist positions create larger caseloads for existing staff members, and using virtual contractors still generally requires in-person support for direct services, thus creating additional work for existing in-person staff, such as completing evaluations, screeners, and assessments. This approach compromises quality education and interventions our students desperately need to succeed in their educational endeavors and post-public education lives. Providing direct services to students through virtual means is troublesome in that an adult facilitator must be present with students, which, in turn, means more money is spent, as two people work with students who receive direct services through virtual providers. Consequently, our ability to meet state and

federal educational standards is notably increasingly difficult, which can ultimately harm student learning outcomes in the short and long-term.

Recommendations

This multifaceted issue requires a multifaceted approach. It would behoove the State of Oregon to fund 0-21 education further so school districts and ESDs can enhance salary competitiveness for specialist positions, yet funding has decreased for Regional Inclusive Services, provided through ESDs. Cascade Regional, from which SCESD is a subcontracting ESD through Linn-Benton Lincoln ESD (LBLESD), has experienced a dramatic decrease in per student funding over the past 8 biennia:

<u>Biennium</u>	<u>Funding (GF & FF)</u>	<u>Student Count</u>	<u>Funding per Student</u>
2007-09	\$60,538,735	17,274	\$3,505
2009-11	\$62,068,500	18,576	\$3,341
2011-13	\$61,020,234	18,161	\$3,360
2013-15	\$59,938,529	18,458	\$3,247
2015-17	\$58,006,947	19,717	\$2,942
2017-19	\$61,917,950	21,459	\$2,885
2019-21	\$62,099,109	24,429	\$2,542
2021-23	\$69,248,156	24,160	\$2,866 with ARP \$2,514 without ARP

Excluding the temporary American Rescue Plan that was enacted for a limited time during the COVID-19 pandemic, regional per student funding has declined by \$991 over 8 biennia. Due to inflation and rising costs, one would expect this figure to *increase* by at least this amount rather than decrease so substantially. This 32.93% decrease in per student funding coincides with increases in student numbers. Since the 2007-2009 biennia, the number of students with “low-incidence” disabilities has increased 33.24%, a total increase of 6,866 students.

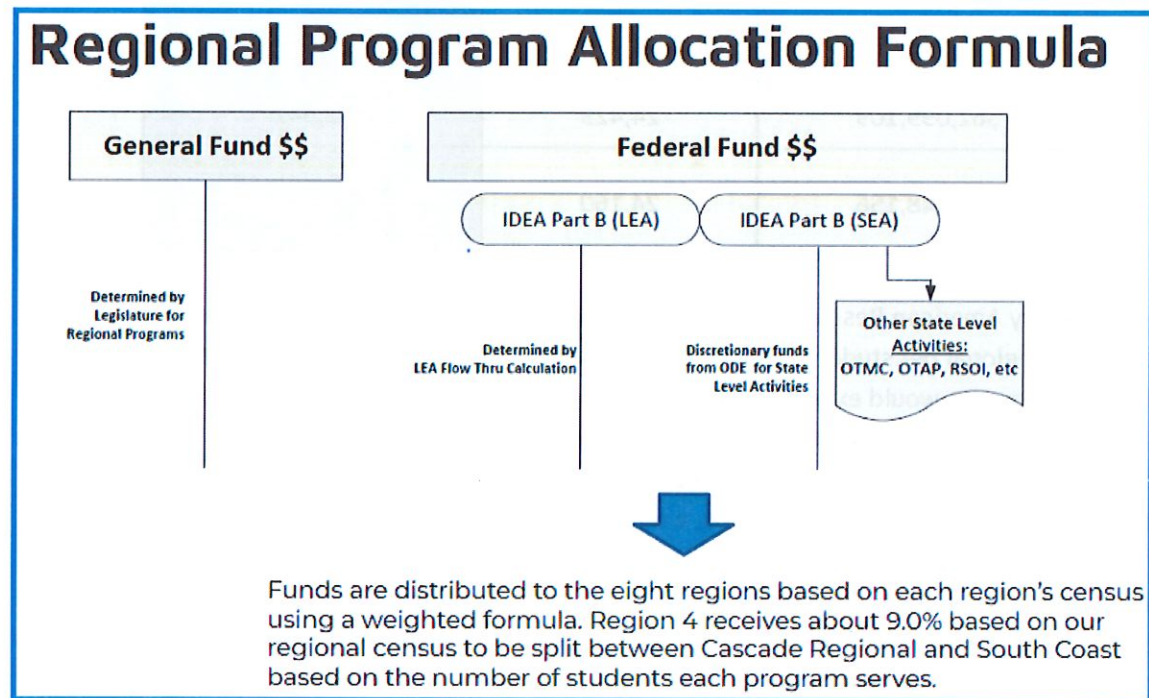
Funding is allocated to Cascade Regional Inclusive Services based upon annual December Child Counts. School districts are required to report the number of students between the ages of 5-21 who are eligible for and receiving special education services in Oregon on December 1. Early Intervention/Early Childhood Special Education (EI/ECSE) also reports annually on December 1st



their student count for those ages 0 (birth)-4 who are eligible for and receive special education services in the state.

However, the Child Count model is flawed; it does not take into consideration the number of students who ultimately qualify for services *after* December 1st. For instance, SCESD served 24 students with a Deaf and Hard of Hearing eligibility and services as of December 1, 2023, yet at the end of the 2023-2024 school year, 37 students, an increase of 42.62% of eligible students receiving services. Regional programs in ESDs are only funded based upon the count captured in December of each year, yet nothing is in place to ensure funding for increased student counts upon closing the school year. In this specific instance, SCESD only has 1 1.0 FTE Teacher of the Deaf (ToD), yet a caseload this size is unrealistic if we are to provide adequate service levels (ASLs) to our students. The only way it is feasible for our current 1.0 ToD to manage such a large caseload is to provide inadequate service times to students, thereby impacting their chance at meaningful language acquisition and therefore progress in all academic and social peers. It is inequitable to settle for lackluster services merely due to funding based on numbers captured halfway through the school year. This is not specific to students with hearing loss; all low-incidence disability areas increased between December 2023 and June 2024. Clearly, from the consideration of the annual December Child Count, this system does not work.

Another system that must be revised is that of the regional funding formula as a whole:





In Oregon, education is primarily funded through the state's General Fund, which is a critical component of the state's budget. The General Fund collects revenue from various sources, including personal income taxes, corporate taxes, and other state revenues. This pool of funds is then allocated to a range of public services, with education being one of its largest beneficiaries. By channeling a significant portion of the General Fund into K-12 schools and higher education institutions, Oregon aims to provide a stable and equitable funding structure for educational programs, yet misses the mark and ultimately falls short. This system aims to ensure that public schools and colleges receive the financial resources necessary to support student learning, maintain infrastructure, and attract qualified educators, all while balancing the broader needs of the state's budget, although it is painfully clear that Oregon does not achieve what it aims to through this funding model.

Oregon employs specific formulas to allocate funding for Regional Inclusive Services across various disability areas, seeking to ensure that resources are distributed in a way that meets the diverse needs of individuals with disabilities, though this is not the case. These formulas take into account several factors, including the prevalence of different disabilities within each region, the level of support required, and the availability of local services. By using data-driven approaches, such as population estimates and service utilization rates, Oregon's formulas aim to provide equitable funding to regional providers, thereby enabling them to deliver tailored support and interventions if funding was truly adequate. This targeted funding approach seeks to foster inclusive environments and ensure that individuals with disabilities receive appropriate and effective services, regardless of their geographic location within the state, though due to the breakdown for each area, this is an impossible, unattainable dream.

Last biennium, approximately 38% of the total Cascade Regional budget was from State General funds; this biennium, only 37.4% of the regional budget is from State General funds.

Determining the amount allocated to ESDs depends on the disability a student has. Notably, Autism Spectrum Disorder (ASD) is still considered a low-incidence disability despite a tremendous increase in diagnosis and prevalence. In 2002, 1 in 150 children were diagnosed with ASD, whereas in 2018, 1 in 44 children were diagnosed with ASD, a 109.28% increase (CDC, 2023). Even though such a substantial increase is evident, the State has not amended this calculation and weighting for Autism or any other area for over 40 years, since HB 5026 (1981) (State Plan for Regional Services to the Handicapped). Currently, the State General fund divides the number of students with ASD by 30. In comparison, other disability categories receive more generous funding:

- Sensory Impairment (DHH, VI, DB): divided by 10
- Orthopedic Impairment: divided by 15
- Traumatic Brain Injury (TBI): divided by 15



Clearly, the entire regional funding formula needs to be re-evaluated and more funding and weighting must be ratified to ensure more equitable, adequate services and service levels. This is especially true for ASD, but as a baseline, Regional Inclusive Services needs more robust funding. Our students and communities deserve this.

It is further critical to note that Oregon has the third highest rate of disability prevalence per capita in the U.S. at 39.5% of residents experiencing a disability (Center for Research on Disability, 2024). Oregon is only behind Puerto Rico (44.6%) and Arizona (39.8%) in this area. 22.9% of Coos County residents experience a disability, whereas 21.6% of Curry County residents experience a disability. Coos County trails behind only two counties for top disability prevalence: Sherman at 23.8% and Wheeler at 24.3% (University of Montana - Rural Institute, n.d.). Clearly, Coos County and others require support to ensure those experiencing disabilities receive the support they need, which starts in our classrooms.

School districts rely on education service districts to serve students with disabilities through Local Service Plans. Many Oregon school districts have a small student population; consequently, it is usually counterintuitive to seek hiring specialists when a specialist for one district may be very part-time. By utilizing ESDs, school districts allow ESDs to hire, thus removing potential “headaches” from school districts in need of specialists. Further, school districts can purchase services (including special education classrooms/staff), to meet student needs, which is more economical and advantageous for school districts who may be unable to attract a potential hire due to a job being part-time or finding the right area specialist who lives close enough to the school district to complete services students require.



The following table outlines the Local Service Plan Orders (LSPs) for 2024-2025 received by our school districts served:

Local Service Plan Orders for SY 2024-2025

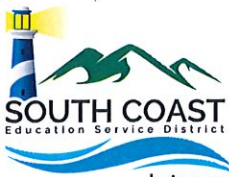
	<u>Adaptive Life Skills (ALS)</u>	<u>Augmentative Communication (AAC)</u> (# + ALS total)	<u>Feeding Team</u>	<u>Special Education Director</u>	<u>Crisis Prevention Intervention (CPI)</u>	<u>Special Education Automation Software (SEAS)</u>	<u>Nursing Consult & Evaluation</u>	<u>School Nursing/ 1:1 Nursing</u>	<u>School Psychology</u>	<u>Occupational & Physical Therapy</u>	<u>Autism Evaluation</u>	<u>K-12 Speech/ ECSE Evals</u>
COST	\$42,771.20	\$2,728.03	\$1,346.18	\$23,139.33	\$750.00	\$25.16	Hourly + \$97.04	\$148,128.54	\$171,331.00	\$176,728.63	\$175,898.00	\$174,662.93
Bandon	6	5	X	X	X	X	X	X	X	0.25	0.05	0.6
Brookings-Harbor	X	X	X	X	X	X	X	X	X	X	0.1	X
Central Curry	2	4	X	0.3	X	48	X	0	0.2	0.175	0.02	0.3
Coos Bay	64	X	2	X	X	X	X	X	X	2		X
CB: Lighthouse	X	X	X	0.1	X	X	X	0.2	0.1	0.025	X	0.3
Coquille	X	4	4	X	X	0	X	2	1	0.5	0.04	0
ECSE	X	X	5	X	X	X	0.4	0.4	X	0.5	X	X
Myrtle Point	X	8	5	X	6	X	X	X	0	0.25	0.05	0.5
North Bend	X	24	4	X	X	X	175	1	X	2.25	0.25	3
Port Orford	5	1	X	X	X	33	X	1	0	0.175	0.05	0.3
Powers	X	X	X	X	X	X	X	X	0.1	0.025	0	0.1
Reedsport	17	X	X	0.25	X	X	X	1	0	0.5	0.04	1
TOTAL	94	46	20	0.65	6	81	175.4	5.6	1.4	6.65	0.6	6.1



The following table is comprised of all agencies contacted during Summer 2024 so as to seek applicants for our open specialist positions, with rates included:

Prospective Agencies and Recruiters for Specialist Positions

<u>Area</u>	<u>Republic Health Resources</u>	<u>Amergis Educational Staffing (Maxim)</u>	<u>Blazerworks (Soliant Health)</u>	<u>AYA Education</u>	<u>PNW Professionals</u>	<u>Pedistaff</u>	<u>Epic Special Education Staffing</u>	<u>Pioneer Healthcare Services</u>	<u>Sounds of Success</u>
Behavior Consultant	X	\$95	\$96-\$107	\$70-\$95	X	X	\$90-\$100	X	X
Certified OT Assistant (COTA)	\$65-\$70	\$70	\$63-\$67	\$60-\$75	X	\$63	\$70-\$80	\$60-\$70	X
Occupational Therapist (OT)	\$100-\$110	\$90	\$88-\$94	\$70-\$95	X	\$73-\$80	\$80-\$90	\$80-\$85	X
School Psychologist	X	\$100	\$94-\$106	\$80-\$105	X	X	X	X	X
Speech Language Pathologist (SLP)	\$100-\$110	\$100	\$86-\$89	\$95-\$110	In-Person: \$95-\$105 Hybrid: \$90-\$95 Virtual: \$80-\$90	\$83-\$90	\$85-\$90	\$85-\$90	\$90-\$100
SLP Assistant (SLPA)	\$80-\$85	\$65	\$62-\$65	\$60-\$75	X	\$73	\$65-\$70	\$60-\$70	X
Teacher of the Deaf	\$80-\$85	\$90	\$84-\$87	\$65-\$95	\$85 for virtual \$88 with 2 visits \$90 with 4 visits	\$85	\$75-\$80	\$65-\$70	X



Interestingly, the average cost of community college in Oregon is higher than that of neighboring California; Oregonians pay, on average, \$5,650 per year toward tuition, whereas Californians pay, on average, \$1,350 for community college tuition, less than a third of Oregon's average community college tuition (Hanson, 2024). While the Oregon Promise is a helpful program, it does not solve the need for additional programs and incentives to pursue specialist programs in the state, nor does it serve or benefit students who attend a university. While it is helpful in that it covers community college tuition for recent high school graduates of Oregon schools, it does not support their future educational endeavors. A consideration of changes, such as allowing Oregon Promise to continue for university students entering specialist programs, may make these fields more attractive and attainable.

The State should offer support to higher education institutions to create more specialist programs, especially in areas with few existing programs. Oregon must help make the education profession more appealing and that extends to educational specialists. This is possible through more robust funding and through strong partnerships with Oregon colleges and the Higher Education Coordinating Commission (HECC) to streamline creating new programs in our colleges and universities that prepare students to enter these specialist positions. It would benefit new and existing programs to consider program capacity and consider admitting more students into their programs. Perhaps the HECC can compile information on these specialist preparation programs to gather data pertaining to program capacity, current enrollment, and the graduation and retention rates from recent years. This information can be used to support the creation of comparable programs in other higher education institutions in Oregon.

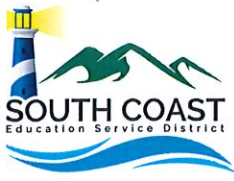
Oregon needs a reliable, sustainable pipeline in these specialty areas to best serve our most vulnerable students. Moreover, the entire regional funding model must change dramatically. In order to create sustainability, the State should consider the use of the biannual kicker, wherein Oregon taxpayers receive money back from the State when filing taxes (with the amount and availability depending on the economic forecast), toward education rather than sending the money back to Oregonians. While this may be disagreeable to those who benefit from receiving the kicker, in order to save our state of education, we must take drastic efforts and make hard decisions.

As a means of filling open specialist positions, the following table was created that outlines which Oregon institutions have specialist programs:



Oregon Higher Education Institutions and Specialist Programs

Institution	Audiology	BVI	DHH	OT	OTA	PT	PTA	School Psychology	SLP	SLPA
Central Oregon Community College	X	X	X	X	X	X	PTA	X	X	X
Chemeketa Community College	X	X	X	X	X	X	X	X	X	SLPA
George Fox University	X	X	X	OT	X	PT	X	X	X	X
Klamath Community College	X	X	X	X	X	X	X	X	X	X
Lane Community College	X	X	X	X	X	X	PTA	X	X	X
Lewis & Clark College	X	X	X	X	X	X	X	PSYCH	X	X
Linn-Benton Lincoln Community College	X	X	X	X	OTA	X	X	X	X	X
Mt. Hood Community College	X	X	X	X	X	X	PTA	X	X	X
Oregon Coast Community College	X	X	X	X	OTA	X	X	X	X	X
Oregon Institute of Technology	X	X	X	X	X	PT	X	X	X	X
Oregon State University	X	X	X	X	X	PT	X	X	X	X
Pacific Northwest University of Health Sciences	X	X	X	OT	X	PT	X	X	X	X
Pacific University	Audiology	BVI	X	OT	X	PT	X	X	SLP	X
Portland State University	X	X	X	X	X	X	X	X	SLP	X
Rogue Community College	X	X	X	X	OTA	X	PTA	X	X	X
Southern Oregon University	X	X	X	X	X	X	X	X	X	X
Tillamook Bay Community College	X	X	X	X	OTA	X	X	X	X	X
Umpqua Community College	X	X	X	X	OTA	X	X	X	X	X
University of Oregon	X	X	X	X	X	X	X	PSYCH	SLP	X
Western Oregon University	X	X	X	OT	X	X	X	X	X	X

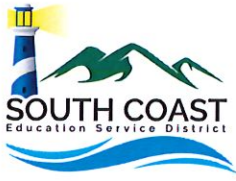


Outreach was conducted to a number of the above institutions as a means of recruiting for open specialist positions. Of those who answered and responded to telephone calls expressing that SCESD was hiring for positions that their programs prepare students for, it was relayed that students were directly hired through their internship programs and already placed in a job.

Attracting specialists and itinerant teachers may be more feasible with increased specialist pay and incentives. It would benefit the State to consider additional funding for specialists, as has been approved for new Speech Language Pathologists. The ODE SLP Stipend Program pays eligible SLPs who complete the program a stipend of up to \$9,000 and SLPAs can receive a stipend up to \$2,000 (Oregon Department of Education, n.d.). Supervising SLPs are granted up to \$800 after the two-year program is completed as well. We need programs like this for OTs, PTs, TDHHs, and more, to ensure adequate staffing and adequate services for students. This recruitment and attraction effort will ensure that our schools benefit from in-person, face-to-face providers, and enough providers to serve students with fidelity.

Workforce improvement grants should be considered in all of this, too. Because we need to improve and make more attractive/appealing our educational workforce serving 0-21, grants and other funding opportunities could encourage people to pursue these programs in colleges. Other incentives can be considered, too, such as student loan forgiveness for college graduates from specialist programs who choose to serve in 0-21 education. Whereas we have Public Student Loan Forgiveness (PSLF) to forgive student loans once someone makes 120 on-time payments when working with an eligible employer, earlier incentives and forgiveness would increase interest in completing specialist programs and likely decrease stress and anxiety associated with the daunting nature of agreeing to costly student loans.

The Office of Special Education Programs (OSEP) should consider a revision of their existing IDEA (2004) formula grants, namely Part B, Section 611, which aims to support students ages 3 through 21, and Part B, 619, which supports children ages 3 through 5. Most of our current specialists and itinerants serve all ages 0 through 21. By revising the formula to consider more than just December 1 Special Education Child Counts (SECC), we can ensure that students are served fully as new school years begin by considering June SECCs. OSEP can also provide more grant opportunities to higher education institutions to attract people to specialist and itinerant positions, much like they did for Portland State University (PSU) who developed and implemented Project KITE (Portland State University, 2021). PSU benefitted from a \$812,500 grant from OSEP to fund prospective SLPs and used the funding to create Project KITE and support 34 upcoming SLPs with schooling. If more higher education institutions had this, it is likely that specialist programs would be more attractive to those entering the workforce.



The ESD has sought the support and partnership of various recruiting agencies to help fill specialist positions. At this time, SCESD is utilizing Blazerworks (formerly Soliant Health) for a full-time virtual School Psychologist at \$106 per hour and a part-time (25 hours/week) virtual Occupational Therapist at \$94 per hour. 2.5 SLPs have been hired to serve this school year, with hourly rates between \$90-\$100 per hour; 1.5 SLPs are in-person and 1 SLP is virtual.

I urge you to consider this. The short-term financial impact the State may endure in any of the proposed measures will prove worthwhile (and currently proves necessary) to the long-term growth and development of our students, and thus, our State as a whole.



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