Report on Colorado Special Education Funding Mechanisms

Prepared by WestEd

Submitted to the Education Committees of the General Assembly through the Special Education Fiscal Advisory Committee in fulfillment of SB 22-127 (2022).

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Introduction

Purpose of this Report: Senate Bill 22-127

During its 2022 regular session, the legislature passed Senate Bill (SB 22-127), which adjusted Colorado's special education funding, including increasing and ensuring future increases to the amount of special education funding provided by the state. SB 22-127 also tasked the Special Education Fiscal Advisory Committee (SEFAC) with submitting a report providing analysis of Colorado's current special education funding mechanisms, including

- an analysis of funding for special education services in other states compared with the funding model used in Colorado, with a focus on the proportionate share between federal, state, and local funding and how other states fund different categories of disabilities to target the needs of children with disabilities;
- an analysis of the actual costs of providing special education services to children with disabilities in Colorado;
- an analysis of the effectiveness of the current model for funding special education services, including whether the current funding model adequately supports special education services;
- an examination of the high-cost special education trust fund (fund) that includes how the fund is operated, who receives funding from the fund, and how the fund impacts those who receive funds;
- an analysis of the current disability categories for children with disabilities and whether the disability categories are sufficient for meeting the needs of children with disabilities; and
- recommended changes, if any, to the special education services funding model.

To respond to this charge, the Colorado Department of Education (CDE) contracted WestEd to examine current, publicly available data; provide technical assistance and support to the SEFAC; and provide a report for the SEFAC to submit to the education committees of the Colorado General Assembly as required by SB 22-127.

Special Education and Related Services

The Individuals with Disabilities Education Act (IDEA) requires each state to ensure that children with disabilities are provided a free appropriate public education as designed for each student through an individualized education program (IEP). Each student's IEP describes the special education and related services needed by the student. States, through local educational agencies (LEAs), are required by IDEA to implement IDEA and ensure each student with a disability is identified and provided with the supports and services they need to receive a free appropriate public education in their least restrictive environment.

Special education is often cited as the costliest categorical education program, with consistently increasing costs over time (Griffith, 2018; National Council on Disability, 2017). Additionally, despite significant increases in investments on the part of federal, state, and local educational agencies in special education programs and related services, large and persistent gaps in outcomes exist between students with disabilities and their nondisabled peers (U.S. Department of Education [ED], 2015; ED, 2018). States and researchers are interested in better understanding the cost of special education and the resources purchased with these dollars, as well as their effectiveness in improving student outcomes. This interest has led to many states studying and reconsidering their special education funding formulas in recent years (Doutre et al., 2021; Atchison et al., 2020; Kolbe et al., 2019; Willis et al., 2019). These studies have highlighted the need for increased funding as well as simpler, more accessible funding methodologies that are responsive to local context and student needs and result in more accessible expenditure and cost data. The Colorado General Assembly is also interested in better understanding the costs of special education and the effectiveness of the state's special education funding system.

To understand the costs of special education, it is important to understand what it comprises. The regulations implementing IDEA define special education and related services:

Special education means specially designed instruction, at no cost to the parents, to meet the unique needs of a child with a disability, including instruction conducted in the classroom, in the home, in hospitals and institutions, and in other settings; and instruction in physical education (34 CFR § 300.39).

Related services means transportation and such developmental, corrective, and other supportive services as are required to assist a child with a disability to benefit from special education. Related services include speech-language pathology and audiology services; interpreting services; psychological services; physical and occupational therapy; recreation, including therapeutic recreation; early identification and assessment of disabilities in children; counseling services, including rehabilitation counseling; orientation and mobility services; and medical services for diagnostic or evaluation purposes. Related services also include school health services and school nurse services, social work services in schools, and parent counseling and training (34 CFR § 300.34).

Special education and related services include qualified personnel to provide specially designed instruction and related services as well as any equipment needed for students to benefit from the services. Specially designed instruction is defined at 34 CFR § 300.39 (b)(3).

Specially designed instruction means adapting, as appropriate to the needs of an eligible child under this part, the content, methodology, or delivery of instruction (i) to address the unique needs of the child that result from the child's disability; and (ii) to ensure access of the child to the general curriculum, so that the child can meet the educational standards within the jurisdiction of the public agency that apply to all children.

In addition to the special education and many related services described above, special education includes evaluations, assistive technology, and other supplementary aids and services.

Evaluation means procedures used to determine whether a child has a disability and the nature and extent of the special education and related services that the child needs (34 CFR § 300.15).

Assistive technology device means any item, piece of equipment, or product system, whether acquired commercially off the shelf, modified, or customized, that is used to increase, maintain, or improve the functional capabilities of a child with a disability. The term does not include a medical device that is surgically implanted, or the replacement of such a device (34 CFR § 300.5).

Assistive technology service means any service that directly assists a child with a disability in the selection, acquisition, or use of an assistive technology device. The term includes (a) the evaluation of the needs of a child with a disability, including a functional evaluation of the child in the child's customary environment; (b) purchasing, leasing, or otherwise providing for the acquisition of assistive technology devices by children with disabilities; (c) selecting, designing, fitting, customizing, adapting, applying, maintaining, repairing, or replacing assistive technology devices; (d) coordinating and using other therapies, interventions, or services with assistive technology devices, such as those associated with existing education and rehabilitation plans and programs; (e) training or technical assistance for a child with a disability or, if appropriate, that child's family; and (f) training or technical assistance for professionals (including individuals providing education or rehabilitation services), employers, or other individuals who provide services to, employ, or are otherwise substantially involved in the major life functions of that child (34 CFR § 300.6).

Supplementary aids and services means aids, services, and other supports that are provided in regular education classes, other education-related settings, and extracurricular and nonacademic settings, to enable children with disabilities to be educated with nondisabled children to the maximum extent appropriate (34 CFR § 300.42).

In addition to these costs that are attributed to individual or groups of students with disabilities, other special education costs include paying for physical space to provide services when space is needed beyond what is available for all students and the administration of special education programs. Those more easily attributable costs for direct services may not include the additional costs of building the capacity of general education teachers to accommodate the more than 80 percent of students who receive their supports in their regular classroom, the costs of identifying students with disabilities, and the costs of administrators and teachers preparing for and attending each student's annual IEP meeting.

Special education administration includes overhead costs for administrators as well as the direct costs of conducting Child Find activities to identify students who might need special education and related services, developing and monitoring the implementation of IEPs, and providing professional development to teachers and other staff, as well as other costs related to maintaining special education budgets, collecting and reporting required data, and engaging in dispute resolution with families when there are disagreements about special education.

For some students, it is not possible to provide the special education and related services they need within a public school system, so those students are placed in other school districts, public institutions, or private schools. The costs of those students' educational programs outside of an LEA are an additional cost of special education.

Methods

WestEd's study of Colorado special education funding consisted of the analysis of current and available extant data; a review of Colorado-specific reports, other state reports, and the research literature on special education funding; and facilitation of four SEFAC working sessions to collect the needed information to solicit input on the study from the SEFAC, inform the analyses, and receive feedback on the draft report and recommendations. WestEd received input and feedback from SEFAC members during four SEFAC working sessions, held in coordination with the CDE on August 8, 2022; August 30, 2022; October 24, 2022; and November 1, 2022.

Limitations

This study of Colorado's current special education funding mechanisms was limited by the available data collected and reported by the state and by the time frame for the study. The study was conducted based only on currently available public data and did not include local data review or collection, verification of the publicly available data, or engagement with stakeholders beyond the SEFAC. In-depth examinations of the adequacy and efficacy of funding models require local data collection and, in general, take years to complete. Recent studies examining the effectiveness of special education funding have taken an average of two years to

complete and included extensive local data collection (Doutre et al., 2021; Atchison et al., 2020; Kolbe et al., 2019; Willis et al., 2019).

State Special Education Funding

Special education operates as a diffuse set of policies, practices, and resources, and many resources, human and fiscal, are an important part of understanding the costs of special education programs. As described in detail in the introduction to this report, special education costs include, but are not limited to, the space, providers, and equipment needed to provide an IEP for each student with a disability, as well as the costs of administering such a program and any dispute resolution.

While IDEA is a funding mandate and provides funds to states, and through states to LEAs for special education services, IDEA funding is not sufficient to provide a free appropriate public education to students with disabilities. Recent accounts estimate that federal funds cover approximately 13 percent of the cost of special education, with that proportion varying based on the cost of special education in specific localities. IDEA includes the intention of providing federal funding to cover 40 percent of the excess costs of special education — that is, the costs above and beyond the costs of the general education program provided to all students. Even if the federal government provided this 40 percent, which is often referred to as "full funding" of IDEA, states and LEAs would be expected to contribute approximately 60 percent of the excess costs of special education.

The Role of States in Funding Special Education

Due to the expectation that state and local agencies will cover some significant portion of special education costs, each state has a mechanism for providing additional funding for special education and related services. The types and diversity of those funding mechanisms are described in detail in the "Special Education Funding Mechanisms: Colorado and Other States" section of this report.

Proportion of Special Education Funding Provided by Federal, State, and Local Funds

Given the diversity in state funding policies, it is perhaps not surprising that state funding plays a different role in each state's funding system. In each state, the provision of special education also relies on federal and local funds, though to varying degrees. While federal funds for special education make up a relatively consistent proportion of overall spending across the states, the balance of state and local funds is highly inconsistent across states.

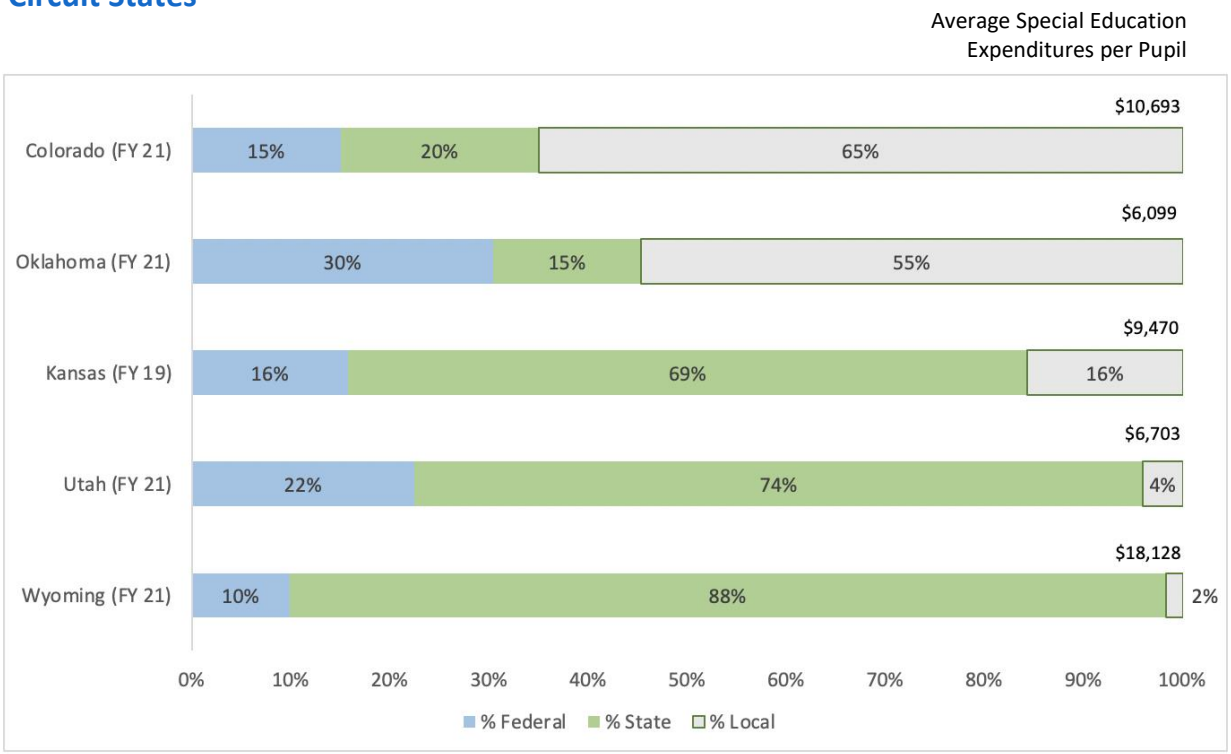
Figures 1 and 2 show the variation of the proportion of special education expenditures made using federal, state, and local funds in Colorado's peer states, selected based on membership in

the federal court system's 10th Circuit, of which Colorado is also a member, and counts of children with disabilities that are most like Colorado's. Additional information about the peer states is included in Appendix A.

It should be cautioned that this analysis does not represent the entire United States, and therefore Colorado's position with respect to the nation as a whole may be different. Additionally, these results should be interpreted with caution because there is not a consistent national source for these figures; therefore, this analysis relies on data from different state accounting systems, and apples-to-apples comparisons of these figures are not expected or guaranteed, as evidenced by the large variation in the reported special education expenditures per pupil. The per-pupil amounts in these figures are obtained by dividing each state's total reported expenditures in a given year by the state's special education child count in that same year.

Figure 1 provides data for Colorado and the other states in the 10th Circuit: Kansas, Oklahoma, Utah, and Wyoming. Due to data limitations, New Mexico is not included in the figure.

Figure 1. Special Education Expenditures by Federal, State, and Local Funds for 10th Circuit States



Source: WestEd calculations of various state and federal sources. Colorado SEFAC, 2022; Dragoo, Granovskiy & Nyhof, 2021; Kansas Legislative Research Department, 2022; NCES, 2021; Oklahoma State Department of Education, 2022; Utah State Board of Education, 2022; Wolfson, 2022). Note: States may differ in how they determine what is a special education expenditure. WestEd has attempted to streamline all numbers and confirm them with SEAs; however, it has not been

possible to do so in all cases. Total special education expenditures are also the authors' calculations based on available data from various state and federal sources.

Compared with other 10th Circuit states, Colorado appears to depend more on local dollars to fund special education services for students with disabilities, as shown in Figure 1.

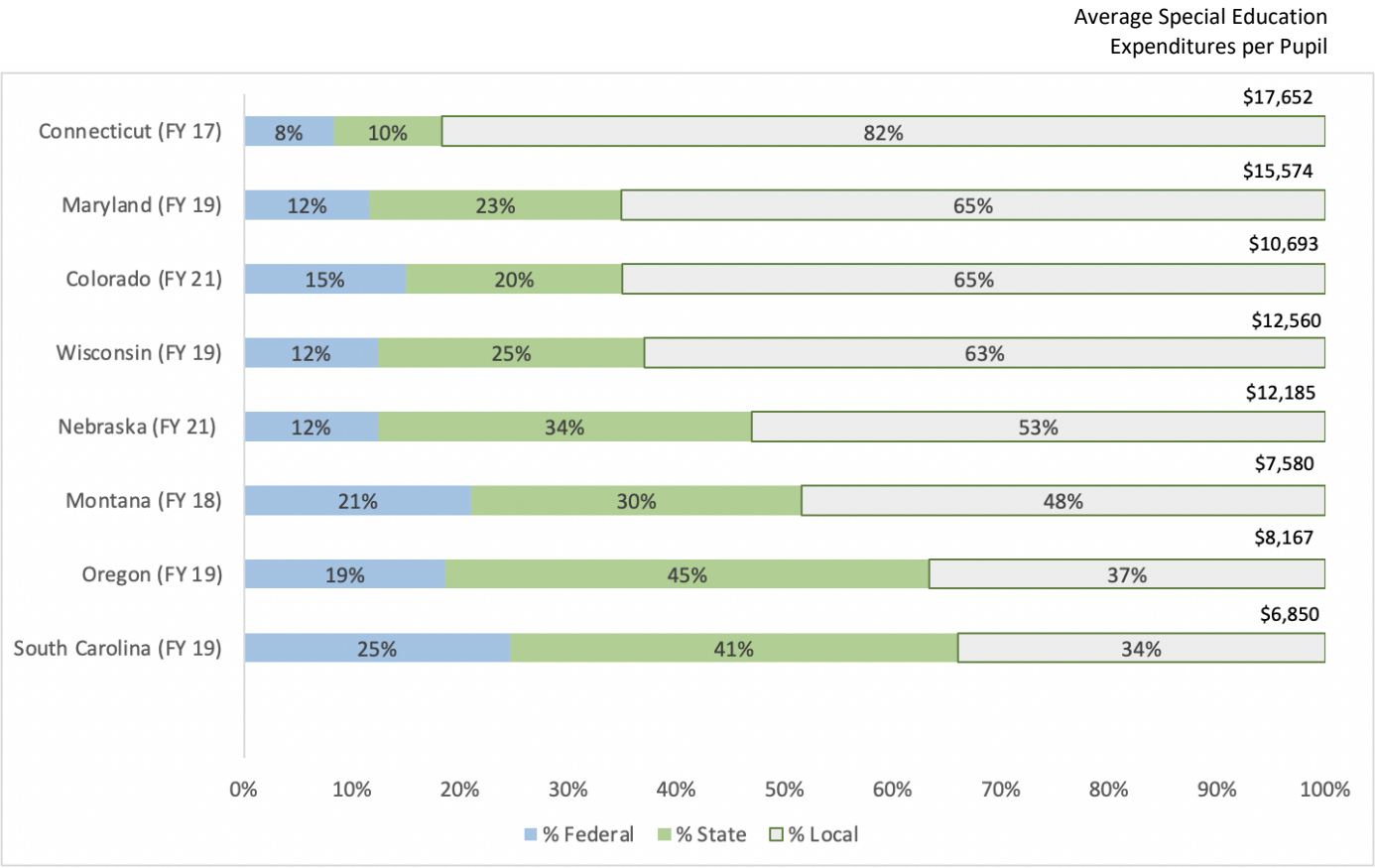
However, it is important to consider the amounts and other state policies that may impact these proportions. While the local proportion in Colorado appears to be greater than in Oklahoma and Utah, the reported total expenditures in those states are significantly less than in Colorado. This could mean that the state invests less overall in special education or may be the result of differences in the established procedures for reporting special education expenditures and which expenditures are routinely counted toward special education function and object codes in each state's accounting systems. While this analysis was focused on the proportion, it is also important to consider the amount and that the amount of state funds allocated to special education in Colorado would result in a different proportion in a state with less overall special education spending.

In addition, policy differences in these states make the separation of state and local funds difficult. For example, Kansas, Utah, and Wyoming all recapture and redistribute local taxes to create equity across local school districts. This means that funds raised by a local municipality that may be considered local funds in another state are designated as state funds in those three states. This practice may explain the large proportion of special education expenditures reported to be from a state funding source.

It is also important to consider the special education child count, or the number of students in each state receiving special education and related services. According to the U.S. Department of Education's Office of Special Education Programs (OSEP), Wyoming reported only 13,195 students with an IEP in 2020, compared with Colorado's reported 98,705 students with IEPs. Kansas reported a child count of 68,488. This can also impact the proportion of funds attributed to the different revenue sources. For example, in states with smaller populations, a state may take on a larger proportion of special education expenses in order to contribute to creating economies of scale that exist in states with larger populations.

Figure 2 shows the same comparison with peer states with respect to special education student count, or the number of students in a state receiving special education and related services. As noted, Colorado reported 98,705 students in its 2020 child count; the 10 states with a count of students with disabilities most like Colorado's in that year are Connecticut, Utah, Oregon, Alabama, Kentucky, Maryland, South Carolina, Oklahoma, Wisconsin, and Missouri, with counts ranging from 78,393 (Connecticut) to 115,909 (Missouri). Note that the study team was unable to locate comparable data for Alabama, Missouri, and Kentucky so they are not included in Figure 2. Utah, Oklahoma, and Wyoming are not included in Figure 2 because they were included in Figure 1.

Figure 2. Special Education Expenditures by Federal, State, and Local Funds for States with Similar Special Education Child Counts



Source: WestEd calculations of various state and federal sources. CO SEFAC, 2022; Dragoo, Granovskiy & Nyhof, 2021; Graves &Kopke, 2021; Local Financial Reporting Office, 2020; NCES, 2021; Montana Student Support Services Division, 2019; Nebraska Department of Education, 2022; Oregon Audits Division, 2020; ReadyCT, 2017; South Carolina Department of Education, 2019; Willis, Doutre & Berg-Jacobson, 2019. Note: States may differ in how they determine what is a special education expenditure. WestEd has attempted to streamline all numbers and confirm them with state education agencies; however, it has not been possible to do so in all cases. Total special education expenditures are also the authors' calculations based on available data from various state and federal sources.

In this comparison, Colorado is still toward the higher end when examining the proportion of special education expenditures made from local funds, but Connecticut does rely more on local funds in comparison, and Wisconsin and Maryland have very similar proportions to Colorado.

No other recent published studies have examined the proportions of federal, state, and local revenue specifically allocated for special education. A recent study for the state of Utah examining the state's overall funding formula (not just special education) had similar results, finding variation across states due in part to state policies (Jacobson et al., 2021). Some states aimed for a specific proportion (Maryland), and others required a specific percentage or amount of local share or contribution to funding statewide (Ohio, Utah, and Wisconsin) (Jacobson et al., 2021). Specifically, Jacobson et al. reported that Maryland aimed to reach a 50-

50 split of state and local funding for its foundation, compensatory education, English Learner, and special education formulas; Ohio, Utah, and Wisconsin required an amount of local funds that resulted in state general funding making up 55 percent of state and local revenues in Utah, 45 percent in Ohio, and 46 percent in Wisconsin. In these three states, required local contributions were not also defined specifically for special education, but proportions were calculated for overall funding.

This review, as well as a review of the relevant research literature, found no evidence to suggest an "ideal" proportion of state special education funds related to outcomes for students receiving special education. Rather, the *same proportion* of state funding in two different states may yield *different outcomes* due to the complex nature of special education funding and service delivery. Potential impact on the state proportion is dependent on and should be considered only as one part of the decisions about special education funding mechanisms, along with many other factors, some of which are further explored in this report:

- **Per-pupil special education spending**: States may cover a higher percentage of special education costs, but the overall spending and potential quality may be lower.
- **Flexibility/requirements of state special education funding streams**: State funds may come with spending or reporting requirements. A higher state share doesn't necessarily equate to less local control over how funds or spent or vice versa. Increasing general funds and not restricting categorical funds can allow for more local decision-making.
- **Timing/burden of reimbursement systems**: In states that use a reimbursement system, applying and waiting for reimbursement are inconvenient and create a local administrative burden. Confusion over approved expenses can result in denied services or unreimbursed costs.
- **Local ability to raise revenue and draw on those funds**: States with similar local shares may have very different rules about local contribution relative to capacity which can lead to variation in local funds and impact program quality. Some communities may be able to support a robust special education program, while others need more state support due to inability to create economies of scale or a lower overall budget that increases the impact of a student with a costly program. Furthermore, as described earlier, many states use a "recapture" method to equalize local funds through redistribution by the state, thus obscuring the line between state and local funds. Therefore, in some states, "state" special education money may include or account for redistributed local money. Local share data can mask variation in local capacity and state policies influencing local generation of funds.

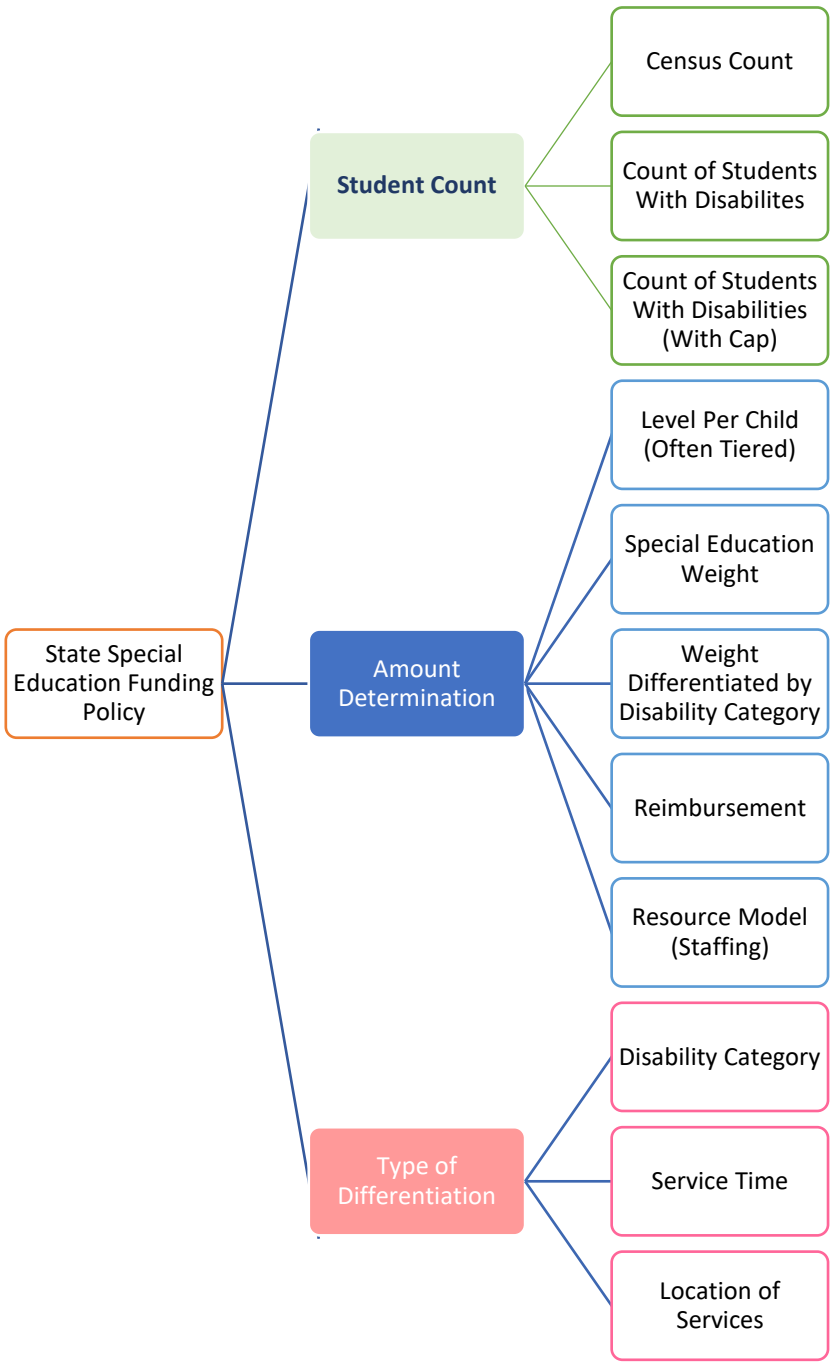
Special Education Funding Mechanisms: Colorado and Other States

Special education funding amounts and proportions are not the only items that vary across states. The mechanisms for calculating and providing funding for special education also vary widely across states. Each state has a mechanism for providing state funds to support special education programs. While special education funding is complicated and many state formulas are also complicated, the biggest differences between state policies can be boiled down to a few policy choices. These choices are related to how each state decides how much funding to allocate for special education, how those funds will be assigned and distributed to LEAs, and rules concerning how special education funding is expected to be spent.

Funding Allocation

Allocation is the process for counting students, calculating an amount of funds to provide using those student counts, and differentiating those counts based on student characteristics through a type of allocation mechanism (e.g., weight, amount per child). Figure 3 illustrates three key decision points for policymakers related to that allocation: which counts of students to use for allocating special education funding, how to use those counts to calculate amounts or resources to provide, and whether to differentiate those amounts based on student characteristics (e.g., disability category).

Figure 3. Special Education Funding Design Decision Points



Student Count Methods

There are several ways to count students for providing state special education funding, and each way of counting has specific implications for the funding formula and other policies. Table 1 describes these methods, their potential implications, and the number of states that have adopted these methods for the 50 states and the District of Columbia.

Table 1. Summary of Student Count Methods for Special Education Funding

Student Count Method	Number of States	Description and Implications
Actual Count of Students with Disabilities	39	Special education allocations are based on the actual count of special education students, or program enrollment (count of students with an IEP). When funding is tied to special education enrollment, it is more closely tied with the actual number of students requiring these services/funds. A student count is more responsive to variable identification rates across local agencies, and precautions should be put in place to ensure such a policy does not incentivize overidentification. For example, in six states, funding is tied to the number of students with disabilities, but there is a cap or upper bound, and districts can receive funding only up to that cap even if they have more students who qualify.
Census Count	8	Special education allocations are based on a count of total students, not only students with disabilities. Policymakers may opt to use average daily membership or enrollment (ADM or ADE) or average daily attendance (ADA). State policies that use census count reflect an assumption that there is some relationship between the total student enrollment and special education need. For example, South Dakota's Level 1 funding is applied to 10% of ADM, even if the LEA has identified more or fewer students. Using census count often intends to ensure students are not under- or overidentified for special education, but one of the potential implications is that sufficient funding may not be provided for LEAs with higher-than-expected identification rates. Variability among identification rates may be due to socioeconomic status or other factors.
Hybrid	4	Special education allocations are based on a hybrid of actual and census counts. State policies that use a hybrid count often use the census count for one level of funding (e.g., the lowest tier of special education funding) and the actual count for a more costly level of funding.

Source: WestEd analysis of state documents, 2022.

Colorado's special education funding formula uses the actual count of students with disabilities from the immediately prior fiscal year to allocate both Tier A and Tier B special education funding. The actual count of students with disabilities is based on the December 1 count that is reported to the U.S. Department of Education as required under IDEA and is different from the October 1 counts used for general education funding.

Tier A is funded first for all students with disabilities. Then, Tier B is funded for students with more significant support needs, defined as students who are identified in one or more of the following disability categories: visual impairment, including blindness; hearing impairment, including deafness; deaf-blindness; serious emotional disability; autism spectrum disorders; traumatic brain injury; multiple disabilities; and intellectual disability. However, a cap on the total amount of funds available effectively places a cap on the amount of funds available per student for Tier B funding, meaning that the total amount of funds allocated does not increase as the number of Tier B students goes up.

Allocation Formula (Amount Determination) Types

Using either a census count or the actual count of students with disabilities, the next policy decision is a method for calculating the additional amount or resource per student. Table 2 provides a summary of the allocation methods used by most states, with a description and implications of the policy decision.

Table 2. Summary of Formula Types for Special Education Funding

Special Education Allocation Formula Type	Number of States	Description and Implications
Weights	25	Apply a weight (or multiple weights) to the state's base per-pupil amount for education to calculate a supplemental amount of special education funding. For example, if the base amount is $10,000 per student and the special education weight is an additional 0.3 weight, the additional amount generated per special education student would be $3,000, for a total of $13,000 generated through the state formula for each student with a disability. As summarized in Table 3, 21 states provide a single weight, while 22 others apply multiple weights or categories to account for differentiation (not including high cost). This accounts for the different funding levels required for different types of student needs.

Special Education Allocation Formula Type	Number of States	Description and Implications
Amounts	12	Allocate a specific amount (or amounts) per child, either for all children (census) or for students with disabilities. Some states allocate a specific amount for each child in the ADM count. For example, California allocated $715 for each child in the ADM count in 2022–23. Other states allocate amounts per student with a disability, including Colorado. Some states allocate higher amounts per child but cap the percentage of students who can receive these higher amounts. For example, in North Carolina, there is a set amount of $4,549.88 per child with a disability, but this revenue is capped at 13% of the ADM per district.
Resource (Staffing Model)	6	Allocate resources (teacher units, aide units, supervisory units) per number of children or number of children in specific categories. This is sometimes referred to as a staffing allocation model. Funds for resources (usually personnel positions) are allocated based on a student-staff ratio and may be differentiated based on student characteristics. For example, a base allocation of one full-time equivalency (FTE) for every 20 students with an IEP might be supplemented by an additional FTE for every 5 students in a more needs-intensive disability category, such as deaf-blindness or intellectual disability.
Reimbursement	8	Reimburse districts for special education expenses, usually on a percentage basis. This is usually capped at a certain percentage or level. Colorado's neighbor Wyoming used to reimburse at 100%, requiring no additional local effort for special education. However, starting with the 2020 school year, state funding was capped at 2018–19 levels for the 2019–20 and 2020–21 school years (Bailey, 2018).

Source: WestEd analysis of state documents, 2022.

Colorado's funding formula allocates an amount per child, as described in the 2019–20 annual SEFAC report (2021):

- For Tier A funding, each Special Education Administrative Unit receives $1,250 for each student identified for special education services from the prior year's Special Education

December Count. This amount had remained unchanged since 2006, with no adjustment for inflation. SB 22-127 increased Tier A funding to $1,750 for each student and included an inflation factor that will adjust for inflation beginning with the 2024–25 fiscal year.

- For Tier B funding (for specific disability categories), during the 2019–20 school year, Tier B funding was $2,849 per student, but in 2020–21 preliminary funding decreased to $2,629 per student, 43.8 percent of the $6,000 per-pupil target authorized for Tier B students. The $6,000 maximum target for Tier B, supplementing the $1,250 for Tier A for those students, was calculated based on data collected from LEAs in 2006 about the cost of special education.

It is also important to consider the interdependence of Tier A and Tier B funding. The total amount of funds available for special education is set by the Colorado legislature each year, regardless of changes in student count. This means that unless the legislature increases overall funding, there is not additional funding for growth. Tier A funding is allocated first, and Tier B funds are allocated from the remaining funds to LEAs proportionately, based on the number of students in Tier B. This results in Tier B funding being less than envisioned per student.

Student Differentiation Methods

States also must consider whether and how to differentiate across categories of students with disabilities for funding purposes such as Colorado's Tiers A and B. Differentiation methods generally fall into three categories that can be used in isolation or in combination: disability type or category, service time, and location of services. Just over half of states differentiate funding based on a student factor within special education. As Table 3 shows in more detail, 17 states use disability categories or groupings of disability categories, 3 use service hours, and 2 use location of services. These differentiation methods can be applied to any of the calculation methods described in Table 2.

Table 3. Summary of Differentiation Methods

Differentiation Method	Number of States	Description and Implications
Single Category	21	Singular weight, amount, or ratio that is applied to all special education students (with the exception of high cost students, for whom the amounts are usually calculated separately, based on actual costs, similar to Colorado's Tier C funding).
Disability Category, Type or Severity	17	Disability category or groupings of disability categories. States use a varying number of categories, from 2 (like Colorado's Tier A and B), to up to 13. Five states use 2 categories.

Differentiation Method	Number of States	Description and Implications
		Seven states use 4 to 6 categories. Five states use between 7 and 13 categories.
Service Time	3	Amount of time a student receives special education services (number of hours or percentage of school day).
Location of Services	2	Location of services as a measure of intensity and cost, which is combined with disability category. Note that IDEA does not permit a formula that incentivizes placement in more restrictive settings. States that use location of services use it in combination with other differentiation methods and have safeguards in place to ensure it does not incentivize placement in restrictive settings.

Source: WestEd analysis of state documents, 2022.

Funding Distribution

In addition to determining the amount of special education funding using student counts, allocation methods, and differentiation methods, states also make policy decisions about how and to which agencies supplemental special education funding will be distributed, including whether and how many funds are retained at the state level to administer special education. These decisions are less frequently discussed but are an important component of special education funding. States can identify a variety of entities to receive funds and be responsible for providing education programs for children with disabilities.

In Colorado, Tier A and Tier B funding is provided to the Special Education Administrative Unit (AU). An AU is a designated legal entity that is responsible for identifying and providing special education to children identified with a disability under the requirements of the Exceptional Children's Educational Act (ECEA) and that is assigned the responsibilities of an LEA under IDEA. An AU may be, for example, a single school district, a group of school districts participating in a Board of Cooperative Educational Services (BOCES), the Charter School Institute, or a state-operated program such as the Colorado School for the Deaf and Blind.

In 2022, Colorado has 178 school districts, of which 42 districts were standalone AUs and 136 were members of a BOCES or consortium. Larger school districts in Colorado often serve as their own AU, whereas BOCES often serve as the AUs for smaller, rural school districts.

Colorado's Tier C, or high-cost funding, is awarded through a voluntary application process for funds from the SEFAC. For 2020, a total of $4 million ($2 million for students in high-cost out-of-district placements or programs, and $2 million for students in high-cost in-district placements or programs) was appropriated under ECEA to reimburse AUs for students in high-cost placements or programs in 2018–19. The eligibility threshold to receive reimbursement is set at

$40,000 per student for high-cost out-of-district placements and at $25,000 per student for high-cost in-district placements. Additional information about Tier C high-cost funding is provided later in this report.

Rules for Spending Special Education Funding

Another distribution decision, related to the rules about how state special education funding can be spent, is whether special education funding is distributed as part of the general fund, as an increase to the base funding made available for general education, or whether instead funds are a separate funding stream, often referred to as categorical. Colorado is in the majority of states (43) that align the distribution of funds and responsibility for IDEA requirements and providing services through a restricted **categorical funding stream**, while 7 states include funding **as part of base funding** and do not restrict its use to only special education.

States also establish rules about how special education funding may or may not be used. In most states, funds must be used to provide the special education and related services each student with a disability is entitled to through their IEP, which LEAs are obligated to meet regardless of cost. IDEA does not require that a state's special education funds be restricted to IEP services, but ongoing state and local funding for special education is required by IDEA requirements for state maintenance of financial support and LEA maintenance of effort (MOE). State maintenance of financial support requires that a state make available at least the same amount of state funding, in total or per pupil, for special education from year to year (34 CFR § 300.163), and LEA MOE requires that each LEA budget and expend at least the same amount of state and local, or local, funds from year to year (34 CFR § 300.203). This means that even if funds are not restricted, it is not possible to reduce spending without either a reduction in the count of children with disabilities receiving services in the state, or an LEA's qualification for one of five possible exceptions related to LEA MOE.

Some states have moved toward greater flexibility in using special education funds, but special education funding is the most commonly restricted category of funds. In Colorado, like most other states, state special education funds may be spent on any special education expense but cannot be used to fund core or general instruction. Costs that are covered by special education include all resources and services needed to fulfill each student's IEP as well as the administrative costs an AU incurs to ensure a comprehensive Child Find system for identifying students with disabilities. Other special education costs include professional development for special education personnel as well as for general education personnel to assist them in supporting students with disabilities in their classrooms. Costs to fulfill students' IEPs include personnel prepared and qualified to address behavior and mental health needs in addition to students' academic needs. LEAs often face the struggle of ensuring the services on a student's IEP are provided despite teacher and specialist shortages, especially shortages of school psychologists and speech-language pathologists.

Like other funding policy decisions, spending restrictions involve a series of trade-offs that may impact programmatic priorities. One benefit of restricting state funds for use on special education is that it ensures these funds will be used to serve their intended population: students with disabilities. One drawback is that restricting state funds limits an LEA's flexibility to blend funds together to develop potential programs for students not yet identified for special education, which, if offered to more students, might improve outcomes for this student population in the long run.

Funding Methods in Colorado and Peer States

For the purposes of a comparison group, this report more closely examined the states in the 10th Circuit, which are similar geographically to Colorado. The states included in this group are Colorado, Kansas, New Mexico, Oklahoma, Utah, and Wyoming.

Even within this small peer group, there is diversity in funding methods, as shown in Figure 4. Two states (Kansas and Wyoming) are reimbursement states and are among only eight such states in the country. Colorado is the only state in the 10th Circuit to allocate a specific amount per student within tiers. The remaining three states use weights, though they vary in the design and number of weights.

Figure 4. Special Education Funding Policies for States in the Federal Court System's 10th Circuit

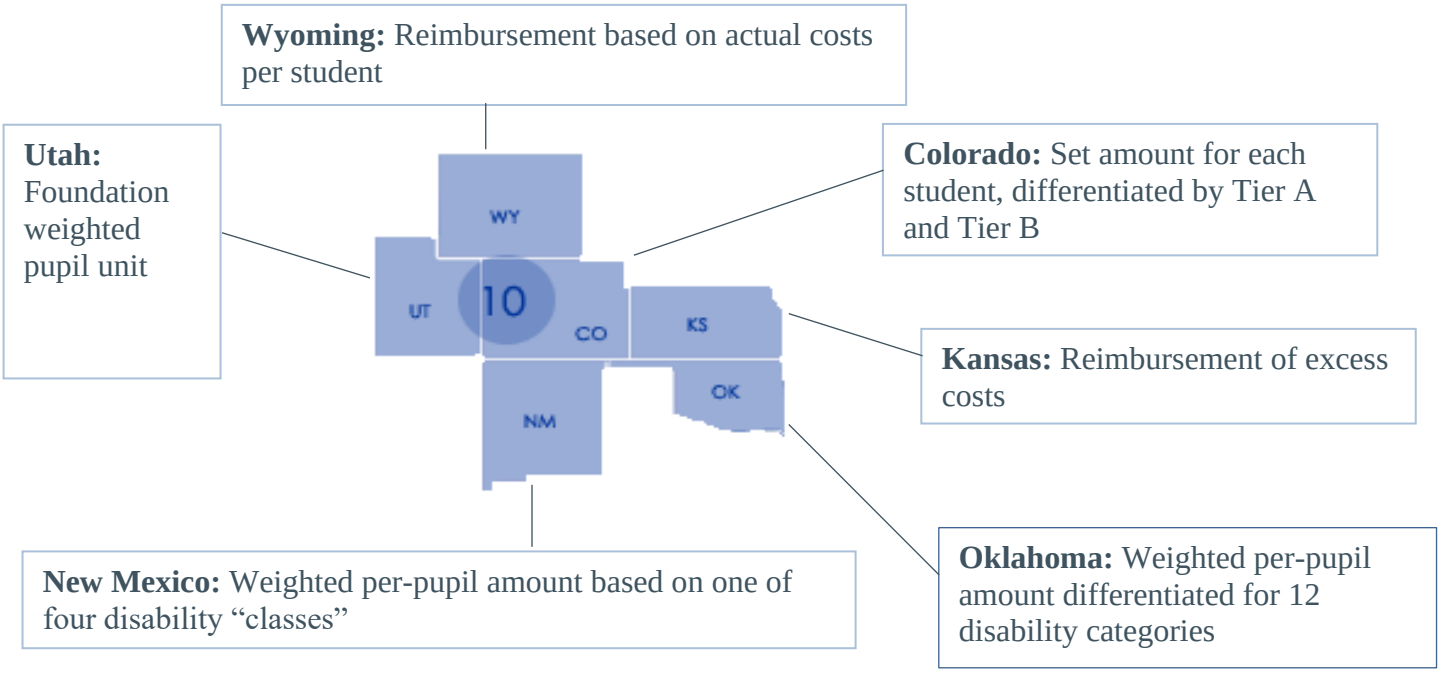


Image source: Authors, adapted from Council Press,2022.

This study also examined the special education funding formulas for the 10 states with a count of students with disabilities most like Colorado's: Connecticut, Utah, Oregon, Alabama, Kentucky, Maryland, South Carolina, Oklahoma, Wisconsin, and Missouri. This group overlaps with the group of states in the 10th Circuit (Utah and Oklahoma) and provides some additional examples. Appendix A summarizes each state's formula, including how it allocates, distributes, and places rules around the expenditure of state special education funding.

As with the proportions of funding, this study and other studies have not found an ideal mechanism or allocation formula for special education. Funding formula choices often communicate a state's priorities in ensuring that the right amounts of funds reach the right students, but no funding formula has been found to better ensure that outcome specifically.

The Cost of Special Education

The legislature requested an analysis of the actual costs to provide special education services to children with disabilities in Colorado. However, the only data available to the study team were the data collected by the CDE annually on special education expenditures reported through the annual SEFAC reports. As part of the annual SEFAC report, the SEFAC provides a gap analysis as its method of calculating the average special education cost per child in Colorado.

As reported in the 2022 SEFAC report (CO SEFAC), the average cost for a special education student in fiscal year 2020–21 was $10,891. Appendix E to the 2022 annual SEFAC report provides the methodology for calculating the gap, dividing each AU's total reported special education costs by the number of students with disabilities in the AU. The average cost was $10,891, and the range of AU costs went from a minimum of $4,896 to a high of $16,647.

This is a wide variation in the amount of reported expenditures and provides some insight into how much the cost of special education varies by AU in Colorado. While Colorado collects and reports data on special education expenditures, which are a proxy for costs, it is impossible to evaluate the actual costs of providing special education services, per child and in total, without conducting local data collection. Studies on the actual cost of special education are rare and costly; the most recent national study on special education costs was conducted nearly two decades ago and found the national average cost to be $12,474 per student (Chambers et al., 2002).

The results of other studies on the actual costs suggest that the average expenditure of $10,891 per child in the 2020-21 school year from the SEFAC report may even be a low estimate as a proxy for cost or that the current expenditure data reported by AUs may not include all special education costs as described in detail in this report's introduction (Doutre et al., 2021; Kolbe et al., 2019; Willis et al., 2019). Examples of costs of special education that may not be coded to special education are the cost of providing accommodations in the regular education classroom and the costs of providing more innovative approaches to inclusion that are currently limited due to lack of funding.

The average cost per student also does not provide a complete picture of the variability of costs per child. From the applications for Tier C high-cost funds (further explored in the next section), we know that special education and related services to fulfill an individual student's IEP can be

extremely costly for some students, as evidenced by single student application costs that were up to 27 times the high AU average of $14,384 per student in the same year. The minimum threshold amounts and recent maximum requests are shown in Table 4, and high-cost funds are further described in the following section, including the number of students for whom the state has received applications, and thus has data on actual per-child costs.

Table 4. Minimum and Maximum Tier C High-Cost Fund Requests, 2020–21 and 2019–20

	2020–21, In-District	2020–21, Out-of-District	2019–20, In-District	2019–20, Out-of-District
Minimum Eligible Threshold	$25,000	$40,000	$25,000	$40,000
Maximum Actual Request	$101,004	$266,600	$146,160	$393,383

Source: Data provided by the CDE. Note: These data do not represent the wide variability in the excess costs of providing special education by student.

The students for whom the state has the best understanding of actual costs are the students for whom an application is submitted for Tier C funding because the application requires reporting the actual costs on an individual-student basis. However, as described in the "Colorado's High-Cost (Tier C) Funding" section, the reports of costs for those students also have limitations.

Due to the limited time and scope of this study, further information is not provided on the actual costs of special education in Colorado. If the state wishes to invest in a study of the actual costs, the study team recommends the following considerations:

- A cost study should also consider the outcomes achieved through the provision of special education services. To better understand implications of cost on outcomes, a cost study should include outcome measures for students with disabilities that are more sensitive than summative statewide assessments that may be specific to students with certain needs. Different outcome measures may be needed, for example, for students classified with specific learning disabilities and for students classified as having an intellectual disability.
- A measure of quality should also be included to examine variability in the quality of IEPs and the quality of services provided to students across jurisdictions. Measures of quality may include the educational benefit proposed and achieved through the student's IEP, the qualifications of staff, and other indicators of quality.

- A cost study should be able to separate out the costs of accommodating students with disabilities in general education from the costs for all general education students. While Colorado AUs are instructed to not include the costs of general education for a student with an IEP as special education costs, it is unclear how the general funds allocated for students with disabilities are used, including for students with more intensive support needs.

Colorado's High-Cost (Tier C) Funding

Colorado funds high-cost special education services through Tier C, a $4 million fund managed by the SEFAC that allocates funds for in-district services and out-of-district placement, taking into account an AU's ability to finance high-cost programs. Applications for high-cost funding are funded based on two criteria: (a) costs must be greater than $25,000 for in-district services and $40,000 for out-of-district services (the "cost threshold"), and (b) districts are ranked and given priority based on financial impact — that is, the district's annual expenditures for a student's special education program, less applicable revenues, and the percentage those expenditures represented of the district's total audited expenditures. Due to the voluntary nature of high-cost applications, and the financial impact factor as well as the limited amount of funding available, not every AU may apply or AUs may apply only for some students, and so Tier C application data is not complete. While Tier C application data are comprehensive at the student level, the data does not fully reflect the cost of programs for all students in need of the most significant supports.

The SEFAC provides details on Tier C in its annual report, including information on the gap between fund requests and dollars allocated. Over the past couple of years, these reports indicate that the gap between requested dollars and fulfilled requests has decreased; however, this does not mean that the need for high-cost services has decreased. Instead, SEFAC members reported that the decrease in this gap likely occurred because the application is burdensome and time-intensive, requiring documentation and significant coordination among providers. In recent years, the CDE and SEFAC have also provided AUs with more information about whether they will meet the financial impact requirement. Armed with this information, fewer AUs apply or AUs apply for fewer students because they are better able to predict whether they will be reimbursed.

This further limits the completeness of data on Colorado's high-cost students. The application data from Tier C represent only a slice of the high-cost expenditures that AUs are making each year. Specifically, SEFAC members reported that fewer urban and Front Range AUs may apply for in-district high costs, but they may apply more often for out-of-district reimbursement. Data on high-cost special education expenditures in all districts would be useful for understanding the cost of special education in Colorado. However, this would require BOCES and districts to track these expenditures at the student level, which cannot be expected when sufficient funding for reimbursements is not available.

It is still useful to examine the current Tier C applications. Table 5 shows the unfulfilled and fulfilled requests by AU, demonstrating a range of per-pupil costs in Tier C. This is not surprising; these are students with unique needs, and their care is variable. The average reimbursement was $46,215 for in-district services.[1] The lowest per-pupil cost was in the Uncompahgre BOCES, where five student applications were supported through Tier C funds with a minimum per-student cost of $25,158. The highest per-student cost was made for a student served by Rio Blanco BOSES with reimbursable costs of $101,004 (before revenues were deducted).

Table 5. Tier C In-District Requests by AU, 2020-21 School Year

AU Number and Name	Total Amount Requested	Amount Not Funded	Amount Funded	Number of Student Applications Reimbursed Through Tier C	Minimum Reimbursable Tier C Costs per Student (Before Revenues are Removed)	Maximum Reimbursable Tier C Costs Per Student (Before Revenues are Removed)
03040 Arapahoe 6 Littleton	$1,134,576	$1,134,576	$0	0	$26,712	$77,556
07020 Boulder RE-2	$185,937	$185,937	$0	0	$27,435	$52,857
19205 Elizabeth School District	$409,746	$272,557	$137,189	2	$81,329	$83,033
26011 Gunnison RE-1J	$143,944	$94,950	$48,994	1	$64,912	$64,912
35020 Larimer R-2J Loveland	$323,278	$323,278	$0	0	$29,855	$64,912
39031 Mesa 51 Grand Junction	$347,232	$347,232	$0	0	$27,624	$44,830
64043 East Central BOCES	$460,223	$257,063	$203,160	11	$25,173	$48,239
64103 Northeast BOCES	$876,415	$469,546	$406,869	16	$25,944	$65,698
64123 Northwest BOCES	$119,774	$53,974	$65,800	4	$26,114	$34,106

[1] Note that reimbursements differ from costs. Costs reflect the amount required for the service. The reimbursement amount is lower. It takes into account available district revenue.

AU Number and Name	Total Amount Requested	Amount Not Funded	Amount Funded	Number of Student Applications Reimbursed Through Tier C	Minimum Reimbursable Tier C Costs per Student (Before Revenues are Removed)	Maximum Reimbursable Tier C Costs Per Student (Before Revenues are Removed)
64133 Pikes Peak BOCES	$716,934	$375,000	$341,934	13	$32,675	$61,428
64143 San Juan BOCES	$335,060	$267,420	$67,640	2	$33,580	$65,541
64153 San Luis Valley BOCES	$33,240	$14,448	$18,792	1	$33,240	$33,240
64160 Santa Fe Trail BOCES	$313,940	$178,452	$135,488	7	$27,517	$39,929
64163 South Central BOCES	$72,948	$33,360	$39,588	2	$34,319	$38,629
64200 Uncompahgre BOCES	$192,371	$147,246	$45,125	5	$25,158	$27,344
64203 Centennial BOCES	$760,949	$567,489	$193,460	7	$33,686	$64,770
64205 Ute Pass BOCES	$338,471	$338,471	$0	0	$29,618	$60,110
64213 Rio Blanco BOCES	$366,501	$70,540	$295,961	6	$30,068	$101,004
Total	**$7,131,539**	**$5,131,539**	**$2,000,000**			

Source: CO SEFAC, 2022. Note: This table contains only in-district requests. The amount funded reflects the reimbursed amount (cost minus CDE adjustments for errors/corrections and revenue). The right two columns show costs before revenues were factored in.

Table 6 displays Tier C out-of-district costs by AU for the same school year, 2020-21. As shown in Table 6, AUs had fewer student applications reimbursed through this mechanism. The maximum number of students was 10, while the minimum was zero students. The average per-student reimbursement was $67,782 and it and the range of per-student reimbursement was quite large compared to the in-district requests. The minimum was $40,050 and the maximum was $122,954.

Table 6. Tier C Out-of-District Requests by AU, 2020-21 School Year

AU Number and Name	Total Amount Requested	Amount Not Funded	Amount Funded	Number of Student Applications Reimbursed Through Tier C	Minimum Reimbursable Tier C Costs per Student (Before Revenues are Removed)	Maximum Reimbursable Tier C Costs Per Student (Before Revenues are Removed)
01030 Adams 14 Commerce City	$43,343	$11,691	$31,652	1	$43,343	$43,343
01070 Westminster Public Schools	$173,632	$95,052	$78,580	1	$94,615	$94,615
03010 Arapahoe 1 Englewood	$205,492	$50,834	$154,658	2	$94,781	$98,873
03040 Arapahoe 6 Littleton	$1,103,121	$825,009	$278,112	4	$40,050	$89,187
18010 Douglas RE-1	$711,100	$711,100	$0	0	$46,943	$96,000
19205 Elizabeth School District	$156,208	$27,420	$128,788	2	$55,689	$99,582
21085 El Paso 38 Lewis Palmer	$110,846	$23,002	$87,844	2	$44,047	$66,799
34010 Durango, La Plata	$266,600	$266,600	$0	0	0	0
35020 Larimer R-2J Loveland	$591,032	$426,444	$164,588	3	$51,361	$76,767
35030 Larimer R-3 Estes Park	$118,019	$49,970	$68,049	1	$90,426	$90,426
62050 Weld Re-5J Johnstown-Milliken	$276,359	$102,181	$174,178	4	$40,136	$84,004
64043 East Central BOCES	$790,287	$223,185	$567,102	10	$44,208	$122,954
64053 Mount Evans BOCES	$333,387	$160,937	$172,450	3	$56,884	$90,934
64133 Pikes Peak BOCES	$55,841	$22,340	$33,501	1	$52,695	$52,695

AU Number and Name	Total Amount Requested	Amount Not Funded	Amount Funded	Number of Student Applications Reimbursed Through Tier C	Minimum Reimbursable Tier C Costs per Student (Before Revenues are Removed)	Maximum Reimbursable Tier C Costs Per Student (Before Revenues are Removed)
64200 Uncompahgre BOCES	$59,209	$25,543	$33,666	1	$54,498	$54,498
64205 Ute Pass BOCES	$54,438	$27,606	$26,832	1	$42,168	$42,168
Total	**$5,048,914**	**$3,048,914**	**$2,000,000**			

Source: CO SEFAC, 2022. Note: This table contains only out-of-district requests. The amount funded reflects the reimbursed amount (cost minus CDE adjustments for errors/corrections and revenue). The right two columns show costs before revenues were factored in.

We also examined high-cost fund reimbursements by disability category, as shown in Table 7 for in-district requests. The majority of Tier C reimbursements were in the Multiple Disabilities category (60 students), although only 79 percent were fulfilled, fewer than for Intellectual Disability, with 88 percent of the requested funds being reimbursed. Specific Learning Disability and Hearing Impairment were each allocated 0 percent of the funds requested, though there are very few students in these two categories.

Table 7. Tier C In-District Requests by Disability Category, 2020-21 School Year

Disability Category	Total Tier C Applications per Category	Total Reimbursed in Tier C (Cost Minus Revenues)	Percentage of Requested Funds Reimbursed
01 - Intellectual Disability	8	$155,226	88%
03 - Serious Emotional Disability	36	$88,872	9%
04 - Specific Learning Disability (SLD)	1	$ -	0%
05 - Hearing Impairment, including Deafness	3	$ -	0%
10 - Multiple Disabilities	60	$1,002,350	60%
11 - Developmental Delay	8	$92,469	58%
13 - Autism Spectrum Disorders	47	$541,866	46%
14 - Traumatic Brain Injury (TBI)	2	$17,819	40%

Disability Category	Total Tier C Applications per Category	Total Reimbursed in Tier C (Cost Minus Revenues)	Percentage of Requested Funds Reimbursed
15 - Orthopedic Impairment	2	$15,524	38%
16 - Other Health Impaired (OHI)	14	$85,874	29%
Total	**181**	**$2,000,000**	

Source: CO SEFAC, 2022. Note: This table contains only in-district requests. The dollar values reported in the column 'Total Reimbursed in Tier C (Cost Minus Revenues)' reflect the amount reimbursed (cost minus revenues) and therefore do not represent the full cost of the service.

Table 8 shows similar patterns for out-of-district reimbursements. The percentage of costs reimbursed or fulfilled was lower for the out-of-district applications than for the in-district requests overall and in specific categories.

Table 8. Tier C Out-of-District Requests by Disability Category, 2020–21 School Year

Disability Category	Total Tier C Applications per Category	Total Reimbursed in Tier C (Cost Minus Revenues)	Percentage of Requested Funds Reimbursed
01 - Intellectual Disability	1	$78,580	100%
03 - Serious Emotional Disability	13	$322,677	76%
04 - Specific Learning Disability (SLD)	1	$29,793	100%
05 - Hearing Impairment, including Deafness	2	$31,652	44%
10 - Multiple Disabilities	26	$868,106	60%
11 - Developmental Delay	1	$0	0%
13 - Autism Spectrum Disorders	24	$624,999	50%
16 - Other Health Impaired (OHI)	3	$44,193	35%
Total	**71**	**$2,000,000**	

Source: CO SEFAC, 2022. Note: This table contains only out-of-district requests. The dollar values reported in the column 'Total Reimbursed in Tier C (Cost Minus Revenues)' reflect the amount reimbursed (cost minus revenues) and therefore do not represent the full cost of the service.

Effectiveness of Funding Models: Linking Funding Mechanisms to Outcomes

Based on our review of the literature, we did not find any empirical studies exploring the effectiveness of different funding models. Therefore, we conducted a series of analyses to investigate differences in student outcomes based on the state-level special education funding mechanisms described earlier. These analyses address questions about the effectiveness of funding mechanisms to improve outcomes for students with disabilities, the ultimate goal of special education. However, the results of our analyses, described below, suggest there are no clear and consistent patterns showing that one method is necessarily better to inform special education funding policy decisions.

Methods

We used four different approaches for coding how states fund special education, consistent with the policy options described earlier in the report.

- First, we coded each state based on how its funding formula counts students: actual child count (the count of students with disabilities), actual with cap (the count of students up to a defined number or proportion of the student population), child count (the count of ADM, with a presumption that an identified percentage of the ADM will be students with a disability), or hybrid (a combination of actual child and census counts for different parts of the funding formula).
- Second, we coded each state based on its funding category approach — that is, whether a state restricts the use of supplemental special education funds through a categorical funding stream or provides supplemental funding formulas as part of the base funding, without any additional restrictions.
- Third, we coded each state based on the funding formula type used to calculate the supplemental amount of special education funding: weights (a weight is applied to the base per-pupil funding for each student), amount (a specific amount is allocated for each student with a disability or each student within a subgroup of students with disabilities), resource allocation (a resource, most commonly a teacher FTE, is allocated based on a count of students), and reimbursement (a portion of actual expenditures is reimbursed by the state).

- Finally, we identified how many tiers of funding or categories for differentiation each state used in its formula — that is, how many different weights, amounts, resource allocation criteria, or levels of reimbursement are used in the special education funding formula.

We used two national data sources to conduct the analyses exploring effectiveness:

- First, we examined data from OSEP's annual special education data collection for State Performance Plans (SPP) Letters and Annual Performance Report (APR) Letters. Specifically, we examined data from a series of performance indicators at the state level to evaluate whether different features of special education funding at the state level predicted any differences between states on each indicator. The indicators selected were graduation rates, dropout rates, rates of inclusion of students with disabilities in the general education classroom for 80 percent or more of the day, rates of suspension and expulsion for students with a disability, and post-school outcomes for students with disabilities. We included data from 2015 to 2020 to compare across time and, more important, to increase the sample size for our statistical analyses. For the analyses, we used all available data and estimated a series of multilevel models controlling for time. We did not include time as a predictor in the model because we were not interested in changes across time; rather, we were interested in the average effect of different state special education funding formulas.
- Second, we used the percentage of children with disabilities performing at the proficient level or above on the National Assessment of Educational Performance (NAEP) in 2020. We used two statistical approaches to compare funding approaches. First, we estimated a series of regression models for each funding approach. We then used the same models but added the performance of general education students into the models to control for differences in overall state-level academic performance. We estimated each model for reading and mathematics for students in grades 4 and 8.

Results

Differences by Student Count Methods

States using the census and actual with cap approach had fewer LEAs identified for suspension and expulsion concerns (Figure 5). These same states also reported significantly fewer children with disabilities in general education classrooms 80 percent or more of the school day (Figure 6). States using the census approach reported having more students in separate or alternative settings. Regarding academic achievement, we found no significant differences in the percentage of students with disabilities at or above proficient across all models for state approaches to child count.

Figure 5. Indicator 4B: LEAs with Significant Discrepancies for Suspending or Expelling Students with Disabilities from One or More Race Groups

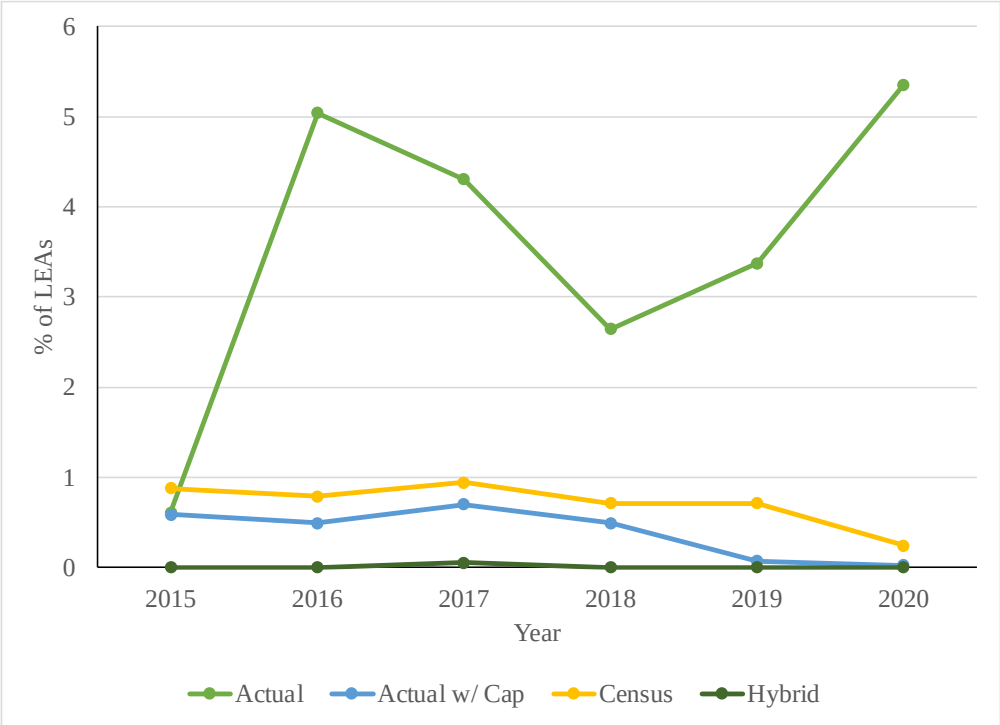
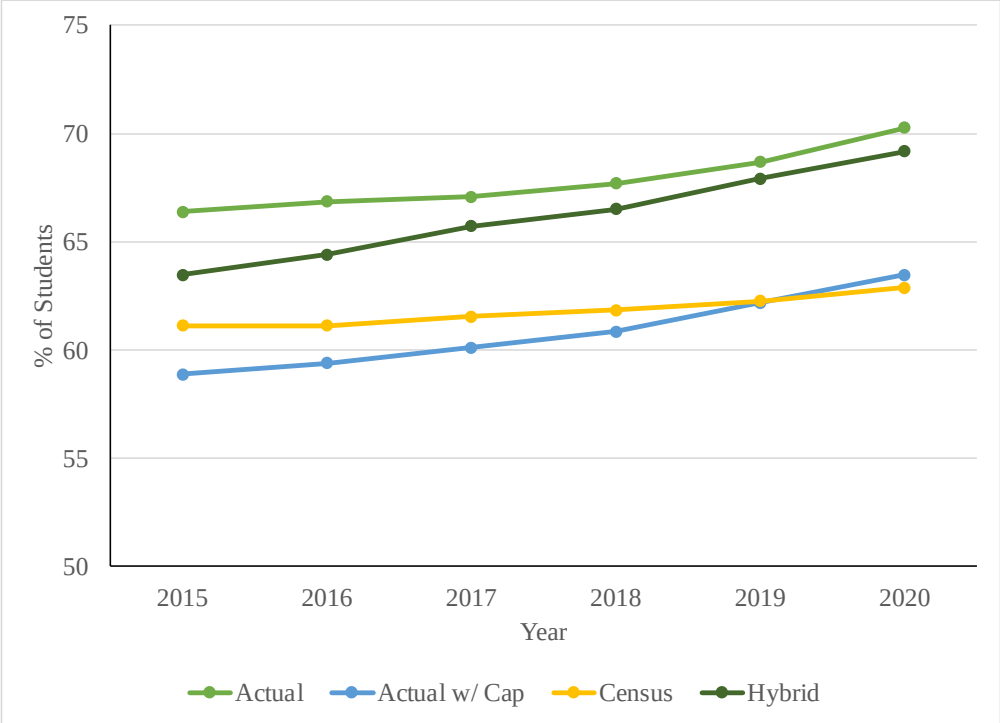


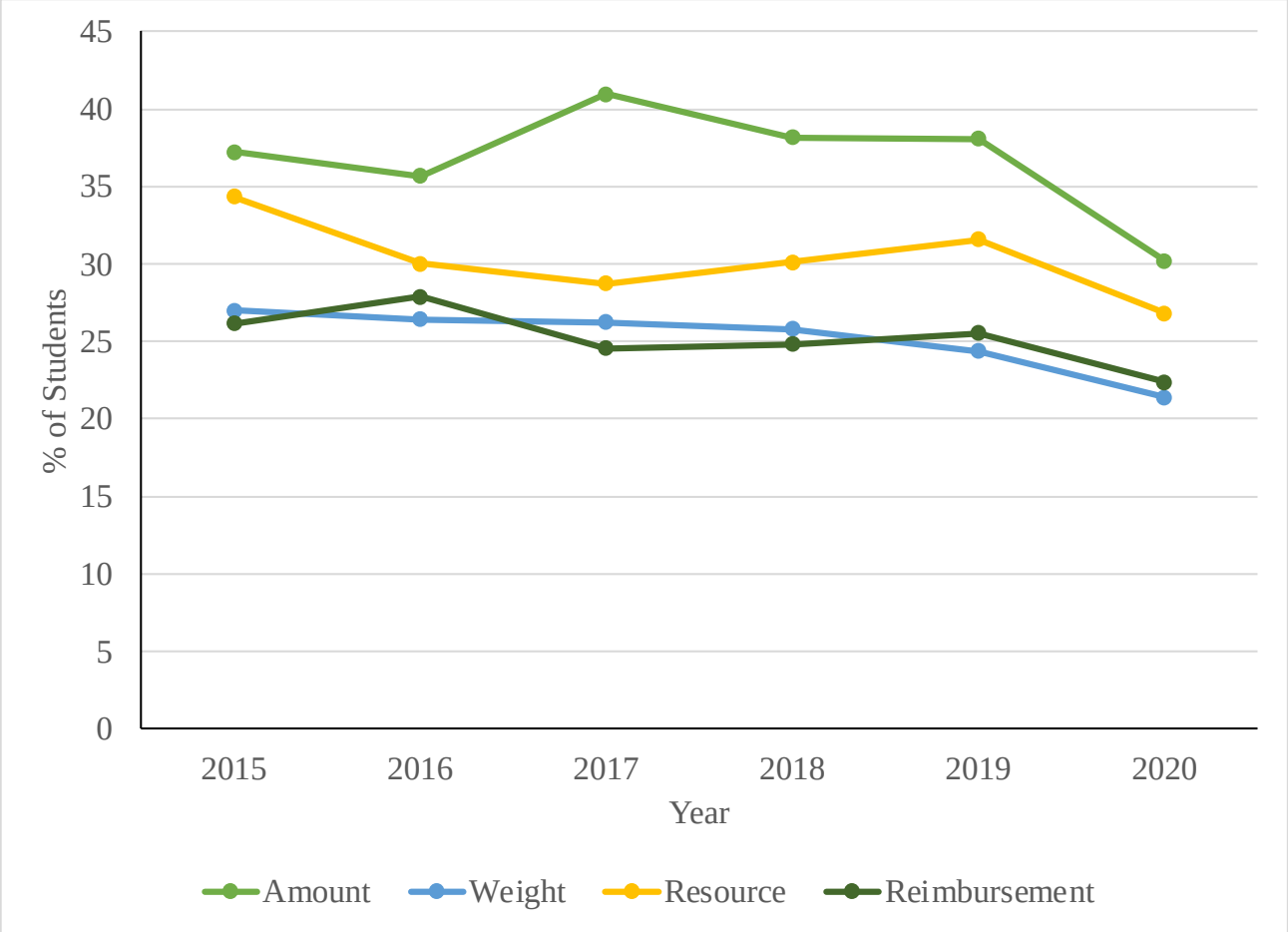
Figure 6. Indicator 5: Inside the Regular Class 80% or More of the Day



Differences by Funding Formula or Allocation Mechanism

Next, we compared states by the funding formula approach used. First, we found that states using weights or resource formulas had lower graduation rates for students with disabilities. States using weights also had higher dropout rates, while states using resource formulas had the largest percentage of LEAs identified for suspension and expulsion discrepancies for students, including those from specific racial/ethnic groups. States using the amount approach had significantly higher percentages of students with disabilities attending higher education, while states using reimbursement had the lowest percentage of students with disabilities attending higher education (Figure 7). We also found that states using resource and reimbursement approaches had significantly lower achievement for students with disabilities in 8th grade math.

Figure 7. Indicator 14: Students with Disabilities Enrolled in Higher Education



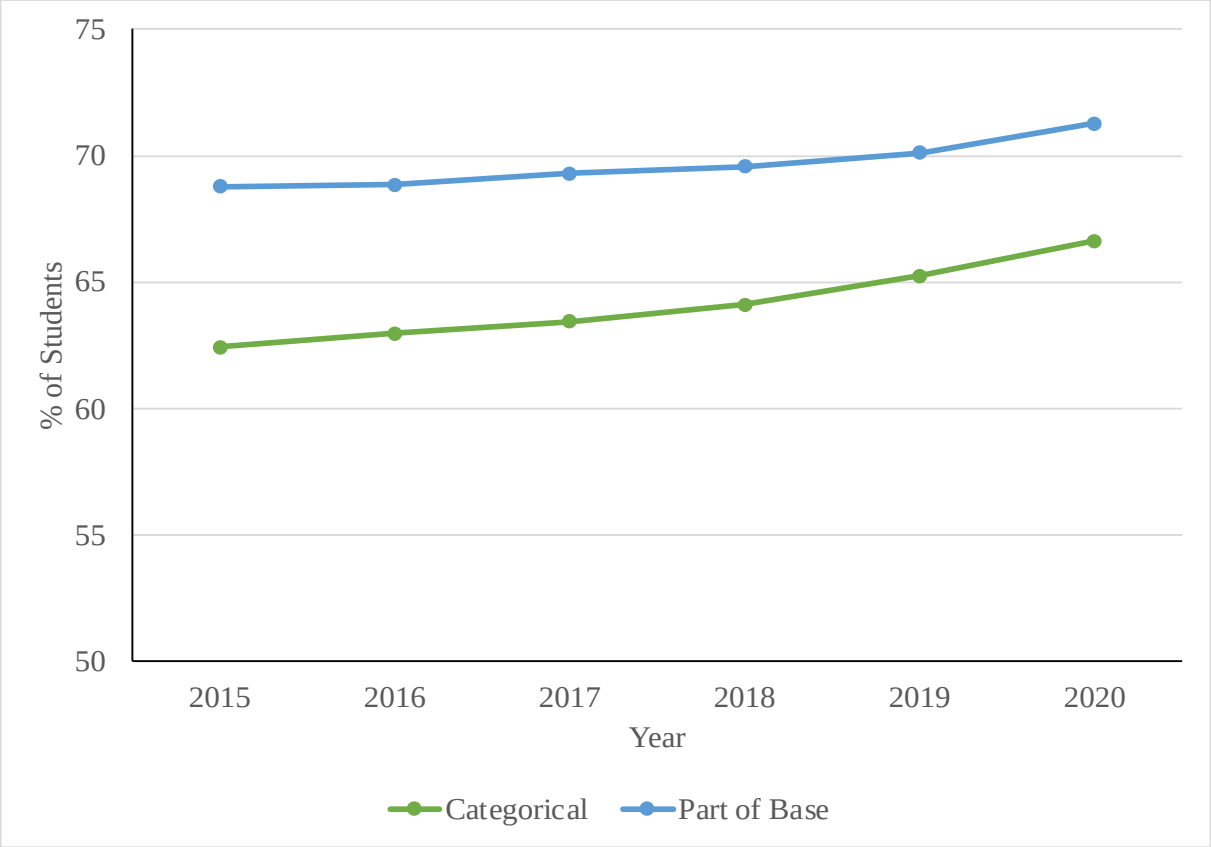
Differences by Number of Tiers

Finally, we examined differences based on the number of tiers used. States using more tiers had higher dropout rates for students with disabilities; more LEAs with discrepancies in suspension and expulsion of students, including those from specific racial/ethnic groups; smaller percentages of students in alternative or separate settings; and a smaller percentage of students with disabilities enrolled in higher education after leaving school. We found no significant relationship between the number of tiers and NAEP performance. These patterns appear to conflict with each other and do not raise to the level of informing policy decisions.

Funding Type: Categorical or In-Base

Finally, we examined differences based on how states categorized students for funding decisions. We found that students with disabilities in states using a part of base, or within foundation, approach are significantly more likely to spend 80 percent or more of their time in general education settings, which could be an indicator of funds being used for more inclusive practices. However, according to the NAEP, those same students with disabilities in states using a part of base approach were less likely to be at the proficient or above levels in reading in both 4th and 8th grades. Thus, although students with disabilities appeared to be included in general education at higher rates (Figure 8), their reading achievement was lower than in states using a categorical approach.

Figure 8. Indicator 5: Inside the Regular Class 80% or More of the Day



Difference by Funding Amount

At the request of the SEFAC, we also conducted the same regression analyses based on the total per-pupil expenditures reported by states (for general and special education). Those analyses also did not find any differences in the student outcomes examined, meaning we found no evidence that higher special education or overall spending per student resulted in improved outcomes.

Conclusion

Overall, we found a few interesting relationships, but we do not believe any rise to the level of justification for making a change in Colorado's special education funding formula. For example, we found that students with a disability in states using a census approach were less likely to be included in general education and more likely to be educated in separate or alternative settings, even though their placement did not contribute to additional funding. Students with disabilities in states using a part of base approach were more likely to be included in general education but also less likely to be performing at proficient or above proficient levels in reading.

States using an amounts approach appeared to have the most positive outcomes compared with states using other funding approaches, such as weights or resource allocation. Finally, more funding tiers were associated with both higher dropout rates and fewer students in separate or alternative settings. Without further exploration into each state's policies and other factors affecting these outcomes, we do not advise using these analyses as justification for making changes to the state's funding formula.

Examination of High-Cost Special Education Trust Fund

In 2019, the Colorado legislature developed a high-cost special education trust fund (trust fund) to be used for high-cost special education trust fund grants (trust fund grants) to public school special education AUs. The initial seed money allocated by the law, SB 19-066, was $2.5 million from the marijuana tax cash fund. The funds from the marijuana tax cash fund were to gain interest and the interest to be used to fund additional high-cost applications.

However, the initial $2.5 million investment was taken back to address pandemic-related expenses in 2020. Before the initial investment was removed, it had gained roughly $55,000 in interest. While that amount remains in the trust fund and will continue to gain interest, no additional funds have been added to the fund since that time. The legislature was "encouraged to prioritize the transfer of appropriation of money to the trust fund," thus increasing the principal and ensuring a large and stable investment base for this fund (SB19-006, 2019). However, no official legal system was put in place for this, thus leaving the trust with a much smaller investment base and no mechanism for ongoing increases to the fund.

In the interim, given that this is a relatively small amount for the purpose of this fund, the SEFAC has determined not to spend the $55,000 of interest. Given the small amount currently in the account, its impact would be limited, so the SEFAC has not yet allocated the funds to a high-cost application. With renewed principal and an ongoing income stream, this fund can fulfill its intended purpose and support students requiring high-cost services.

Analysis of Current Disability Categories

Colorado currently provides assessment and demographic data on 13 disability categories. They are the same categories identified by IDEA:

- Autism
- Traumatic Brain Injury
- Orthopedic Impairment
- Other Health Impairment
- Intellectual Disability
- Serious Emotional Disability
- Specific Learning Disability
- Hearing Impairment, including Deafness
- Visual Impairment, including Blindness
- Speech or Language Impairment
- Deaf-Blindness
- Multiple Disabilities
- Developmental Delay

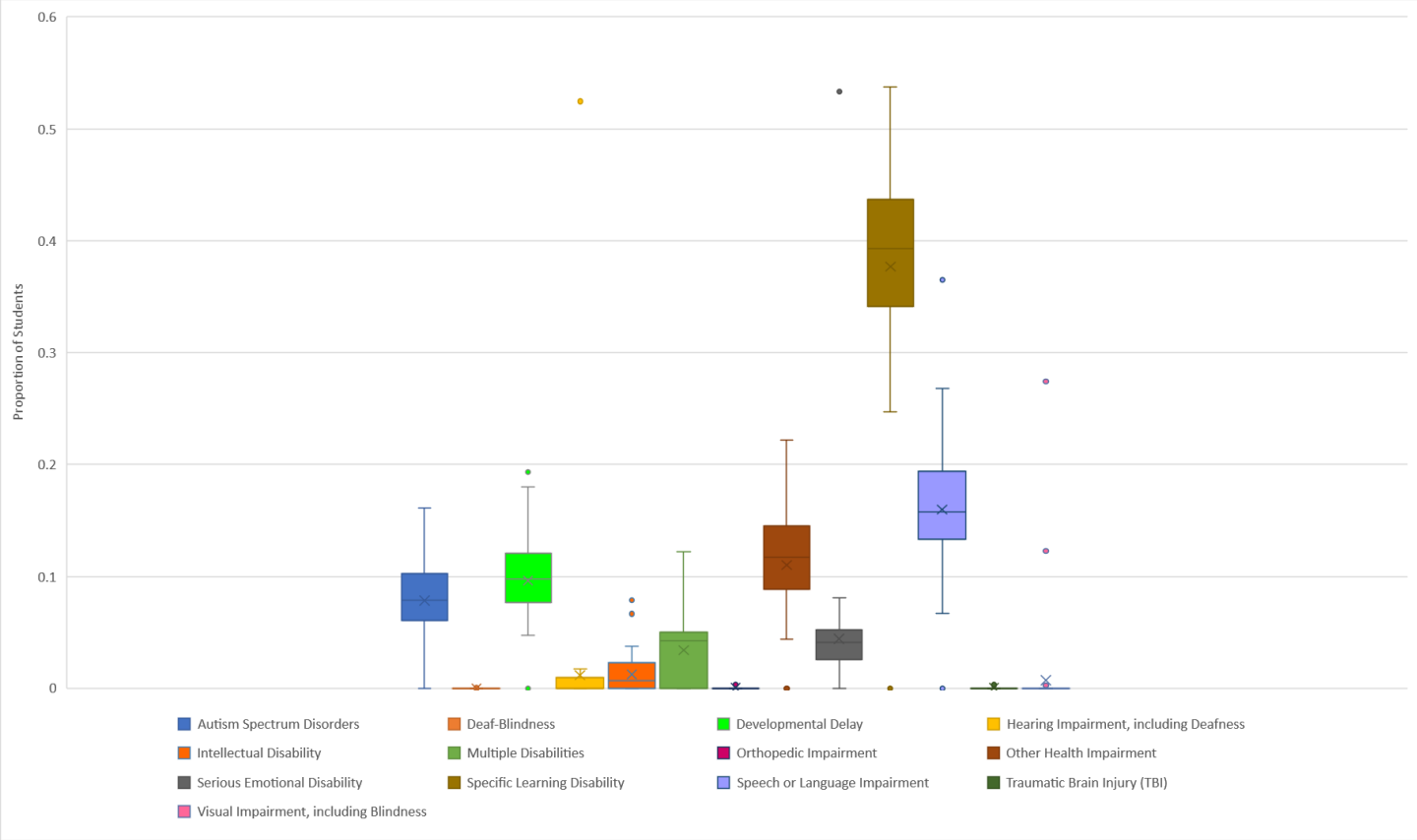
To analyze the appropriateness of using these categories, we looked at categories used by other states and explored patterns in Colorado's identification rates. Nearly all states use the same 13 disability categories laid out in IDEA. One state, Iowa, has foregone the use of disability categories and simply categorizes all students as students with a disability (Grimes & Stumme, 2016). Regarding a funding formula, the disability category is often used as a proxy for the need to differentiate funding tiers, as in Colorado. Without disability category data, other data would need to be collected from LEAs to identify students with a higher likelihood of needing more significant supports and services. Regarding adding more categories, the standard operating procedures for teams conducting eligibility determinations would need to provide clear delineations between existing and new categories.

Examining the proportion of students in each disability category across districts and BOCES yielded some exploratory though insightful conclusions about the use of these categories (see

Appendix B for a detailed table of identification rates by disability category, by AU). Some categories are found in very similar proportions across the state and are displayed by a tighter box-and-whisker plot in Figure 9. In general, this means that most AUs have similar proportions of this disability category. This is true for Serious Emotional Disability, for example. Others have very low incidence rates, and their distribution is very unclear given they are often dropped for *N*-size requirements (this is true for Deaf-Blindness and Traumatic Brain Injury).

On the other hand, some categories were found to have a variable distribution, meaning that the proportion of students in the category varied widely between AUs. This is most pronounced for the Specific Learning Disability category, and there are a number of reasons this could be true. It is the largest category and often is used in combination with other categories, for which data are not available. On its own, this does not indicate that the disability categories need to be changed or that another disability category is needed.

Figure 9. Distribution of Specific Special Education Categories, 2021–22 School Year



Source: WestEd Analysis of CDE December Child Count Data, 2021.

Any changes to these categories should be informed by further data. Adjustments to these categories require feedback about eligibility determination procedures and the potential impact of additional categories from many parties, including the following:

- Special education teachers
- BOCES and district leadership
- Students
- Parents
- Social workers and counselors
- General education teachers
- Pediatrician and child mental health experts
- Child development experts
- Leaders in pedagogy

At the time of this report, the SEFAC did not have feedback from these important partners and therefore is limited in making any recommendations to change the existing disability categories.

The state funding methods described earlier in the "Special Education Funding Mechanisms: Colorado and Other States" section and Appendix A provide some examples of the groupings of disability categories some other states use for funding purposes. This study did not examine whether those categories are also used for program and reporting purposes.

Policy Recommendations

Revisions to Colorado's Special Education Funding Model

Based on the requested analyses conducted by WestEd related to Colorado's funding model and given the limitations of the time and available data for this study, WestEd found no evidence of a specific model or specific changes Colorado might make to have a great impact on students. However, funding formulas often reflect the priorities of a state, and changes can be and often are made to communicate those priorities. Changes to funding amounts and mechanisms are also used at times to encourage innovation or to incentivize meeting specific expectations.

In this conclusory section, we offer some broad considerations for the commission based on this study, which included our review of Colorado data, input provided by the SEFAC, and our review of the research literature, including more comprehensive special education funding studies conducted in other states. We cannot provide data-based recommendations specific to Colorado without conducting further data analyses in the state.

Funding Amounts

As reported by the SEFAC, there is a clear gap between the costs of special education in Colorado and the funding provided as supplemental funding for special education by the Colorado General Assembly. Due to the lack of a national funding source for consistent data on special education expenditures, it is difficult to make a decision based on funding amounts per child in other states.

However, outcomes for students with disabilities, in Colorado and other states, continue to lag behind those for their nondisabled peers, indicating that additional or different supports are needed. Without further data on what supports do result in improved outcomes, we are unable to determine whether Colorado's special education funding is adequate.

Without additional data, we must accept the reported amounts of expenditures in Colorado as a proxy for the costs of providing special education and related services. But, as described in this report, those amounts vary among Colorado districts and may not reflect all special education costs. This study did not find evidence of a specific amount by which special education funding should be increased, but the SEFAC reports that the costs of special education continue to increase, a trend that is supported anecdotally across the country.

We do recommend prioritizing a regular review of the funding mechanism by establishing a statutory requirement that the elements of special education funding be reviewed at least once every five years, if not more often.

Proportions of State and Local Funding

The study found no evidence that there is a specific proportion of special education funding funded by a specific funding source that is related to improved outcomes for students with a disability. Rather, the *same proportion* of state funding in two different states may yield *different outcomes* due to the complex nature of special education funding and service delivery. Compared with the peer states examined for this study, Colorado does depend more on local dollars than other states do to fund special education services for students with disabilities. On average, when accounting for differences in child count, local dollars in the other states represented in the analysis are footing the bill for about 40 percent of special education expenditures, while in Colorado, this proportion is closer to 65 percent. Colorado could prioritize coming closer to the average, but this study did not find evidence that doing so would improve outcomes for students with disabilities. A member of the SEFAC provided the study team with recommendations for specific proportions, but this study did not find evidence to support those proportions.

However, we caution against an assumption that an increase in special education funding alone will result in a shift in that proportion because of the unknown unmet needs for special education, including keeping pace with salaries and other increasing costs. While reducing the proportion of funds that are provided by the LEA might be accomplished by allocating additional state funds for special education, thus freeing up local funds currently used for special education to be used for general education costs, that outcome is not guaranteed. The impact of such an allocation may not be recognized if additional funds are needed beyond the current allocation to provide special education services.

If an adjustment to the proportion of funds is the intention of the legislature, it may need to consider communicating to AUs that the expectation is that funds be used to reduce the local contribution.

Student Counts

Colorado currently uses child counts of the students receiving special education in the immediate prior year to allocate funds to AUs. Considerations for change include the following:

- Use an average count of students with disabilities over multiple years. An average is used by some states (for example, Utah uses a rolling five-year average) to fund growth and provide stability, including protecting small and rural LEAs from loss of revenue resulting from fluctuations in child count.
- Allocate a small portion of special education funds based on census enrollment. Some LEAs, particularly small and rural LEAs, do not always serve any students with a disability, but these LEAs are still responsible under IDEA for having special education programs that conduct Child Find and are prepared to evaluate students who are referred.

- Include a hold-harmless provision. Similar to always allocating funds to a small AU, a hold-harmless provision might restrict state funds from being decreased due to a decreasing population for a number of years, such as three or five years.

Funding Formula and Student Differentiation Mechanisms

Separate from the high-cost fund, Colorado currently allocates funds using two tiers (Tier A and Tier B). Tier A allocates funds for all special education first, with Tier B providing supplemental funding for students in specific disability categories. The amount of funds available for Tier B is dependent on the amount of funds remaining from the Colorado legislature's allocation after Tier A has been funded. Considerations for change include the following:

- Eliminate the interdependence of the two tiers. Allocate an amount based on the actual counts and the funds needed to provide the statutorily established amounts for each student in Tier B.
- Include and ensure the use of a cost-of-living increase factor. This should be consistent with factors used to increase funds for general education.
- Use a weighted system that interacts with the base amount, rather than a specific amount per child. This is used by states to ensure proportional growth for special education funding as general education funding grows.
- Differentiate funding across multiple weights that reflect the needs of students and attend to the actual costs (as estimated by available expenditure data) for specific student groups, including factors beyond disability such as family income and English language learning status. This can communicate the state's fiscal and programmatic priorities to the field, including more inclusive practices and addressing the needs of the whole child.

Funding Flexibility

Granting AUs the flexibility to expend special education funds for broader purposes, provided that the AU is meeting LEA MOE, may also support inclusive practices.

Including weights for students with disabilities in the overall funding formula for general education rather than as a separate (categorical) funding stream may help support inclusive planning and budgeting. However, given MOE requirements, including such weights likely will not reduce the amount of funds that must be expended for special education and related services.

On the other hand, restrictions on state funds allocated for students with disabilities may not be needed, because LEA MOE obligates LEAs to budget and spend at least the same amount of local — or state and local — funds for the education of children with disabilities on a year-to-year basis.

Further Studies

Prior to making additional changes to the special education funding formula, we recommend that the state collect and review additional data to ensure any changes are grounded in data that reflect services and outcomes for students with disabilities in Colorado.

Future studies to inform changes to the funding formula might collect and analyze the following:

- Qualitative data and quantitative data from stakeholders, such as focus groups, interviews, and surveys with special education teachers, administrators, and families. States can use these data to develop programmatic priorities that drive specific decisions related to components of the funding formula.
- AU financial and program data, studied together to determine actual costs (and not only expenditures) for special education and patterns within and across AUs. These data are essential for determining needed amounts as well as for examining whether the disability categories for Tier B are appropriate. Note that additional data collections would need to be approved and the AU burden must be considered.
- LEA programmatic data to assess any impact of spending on outcomes including
  - enrollment and attendance; and
  - student outcomes, such as assessment results and local indicators.
- Student demographic data, such as race, income, language status, and disability category, to study the equitable distribution of special education funds and which factors may indicate the need for additional funding. These data may show that certain student groups cost considerably more, and the legislature may use those findings to determine the weight applied to that student group.

Specific questions for future study recommended by SEFAC members include these:

- What data are available on the needs of AUs to serve students with disabilities? This information could be used to allocate funds toward more specific strategies or activities, including funding to incentivize recruitment and retention of specific professionals whose expertise is most needed or to encourage reduced caseloads for specific groups of students or groups of professionals, for example.
- What is the quality of special education being offered? These data may enable better understanding of the variation of expenditures among AUs and could include how many and how often services are provided, expectations for program delivery, and levels of compliance in AUs.

- What has the impact been of the decrease in facility schools and institutional facilities for students with disabilities? How are the funds being used to support AUs that now may need to provide more services in-district?
- What amount of state funds are retained by the CDE, and how are they used to support special education services in the state?

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Appendix A. Summary of Colorado and Peer State Funding Methods

State	2020 Child Count	Average Per-Child Total Revenue 2020	Average Per-Child Special Education Expenditures (Year Noted for Each State)	Allocation Methods	Distribution Methods	Expenditure Rules
Colorado	98,705	$14,441	$10,695 (2021)	Actual student count. Administrative units receive $1,250 for each student with disabilities (Tier A) and a statutory maximum of $6,000 per student for students with specific disabilities (Tier B). For school year 2020–21, per-student funding for Tier B students was $2,629.	Distributed to AUs as a separate, categorical fund.	All funds are restricted to special education expenditures.
Alabama	91,312	$11,695	*	Census count (ADM) capped at 5% of ADM. One weight, 1.5, applied to base amount.	Distributed to districts through foundation funding (weight), high-cost funds are categorical.	Only high-cost funds are restricted to special education expenditures.

State	2020 Child Count	Average Per-Child Total Revenue 2020	Average Per-Child Special Education Expenditures (Year Noted for Each State)	Allocation Methods	Distribution Methods	Expenditure Rules
				Additional high-cost fund ($2.2 million in federal funds and $15.2 million in state funds).		
Connecticut	78,393	$22,694	$17,652 (2017)	Census count. Legislative appropriation is allocated proportionally to LEAs with a minimum threshold for small LEAs.	Formula/categorical.	
Kansas	68,488	$14,777	$9,470 (2019)	Actual count. Reimbursement. The Kansas State Department of Education calculates excess costs and the statutory state aid amount according to the following formula: (a) Calculate total special education expenditures; (b) calculate excess costs (the total expenditures minus per-pupil cost of regular education minus federal special education aid minus Medicaid reimbursements minus state hospital administrative costs); (c) calculate the statutory aid amount (excess cost figure multiplied by 92% of total state excess costs).	Distributed to LEAs. Reimbursement/ categorical.	
Kentucky	95,554	$12,655	*	Actual count of students with disabilities. The state has three weights for exceptional children of 2.35, 1.17, and	Formula/categorical.	All funds restricted to special education expenditures.

State	2020 Child Count	Average Per-Child Total Revenue 2020	Average Per-Child Special Education Expenditures (Year Noted for Each State)	Allocation Methods	Distribution Methods	Expenditure Rules
				0.24 that are applied to base funding for low incidence (severe), moderate incidence, and high incidence.		
Maryland	100,861	$18,710	$15,574	Actual count of students with disabilities. Additional weight of 0.86 in fiscal year 2022 applied to base funding.	Distributed to local school systems. Formula/categorical.	All funds restricted to special education expenditures.
Missouri	115,909	$13,562	*	Actual count of students with disabilities with minimum threshold for small districts. Additional weight of 0.75 for districts above special education threshold.	Distributed to districts. Within foundation.	
New Mexico	50,311	$14,481	*	Actual count of students with disabilities. Additional weight of 0.7 for class A and B programs, additional 1.0 for class C programs, and additional 2.0 for class D programs.	Distributed to LEAs. Formula/categorical.	All funds restricted to special education expenditures.
Oklahoma	110,423	$10,758	$6,099 (2021)	Actual count of students with disabilities. The state assigns the following additional weights for specific disabilities in 12 categories. Visual Impairment - 3.8; Specific Learning Disability - 0.4; Deafness or Hearing Impairment - 2.9; Intellectual Disability - 1.3; Emotional Disturbance - 2.5; Multiple Disabilities - 2.4; Orthopedic Impairment - 1.2; Speech or Language	Distributed to LEAs. Formula/categorical.	All funds restricted to special education expenditures.

State	2020 Child Count	Average Per-Child Total Revenue 2020	Average Per-Child Special Education Expenditures (Year Noted for Each State)	Allocation Methods	Distribution Methods	Expenditure Rules
				Impairment - 0.05; Special Education Summer Program - 1.2; Autism - 2.4; Traumatic Brain Injury - 2.4; Other Health Impairment - 1.2.		
Oregon	79,782	$15,875	$11,508 (2020)	Actual student count with cap. Funds may not exceed 11 percent of the district's ADM without approval from the Oregon Department of Education. Additional weight of 1.0 for each student eligible for special education. High-cost disabilities: The state provides eligible districts with grants equal to the approved costs incurred by the district minus $30,000.	Funds are distributed to LEAs as a separate, categorical funding stream.	All funds restricted to special education expenditures.
South Carolina	101,365	$14,510	$6,850 (2019)	Actual count of students with disabilities. Provides additional weighting per pupil ranging from 1.0 to 2.57: trainable mentally handicapped - 2.04; speech handicapped - 1.90; homebound - 1.0; emotionally handicapped - 2.04; educable mentally handicapped - 1.74; learning disabilities - 1.74; visually and/or hearing handicapped - 2.57; orthopedically handicapped - 2.04; autism - 2.57.		

State	2020 Child Count	Average Per-Child Total Revenue 2020	Average Per-Child Special Education Expenditures (Year Noted for Each State)	Allocation Methods	Distribution Methods	Expenditure Rules
Utah	78,739	$9,989	$6,803 (2021)	Actual count with cap on growth. Funds awarded based on foundation weighted pupil unit (5-year average) and growth factor. The special education add-on cannot fall below the foundation. The growth factor uses single student weight of 1.53 for each student with a disability. High-cost fund based on actual expenditures.	Distributed to LEAs as a categorical funding stream.	All funds restricted to special education expenditures.
Wisconsin	112,196	$15,293	$12,560 (2019)	Actual count of students with disabilities. Reimbursement model. Special Education and School-Age Parents Aid: Subject to appropriations. For 2020–21, excess costs were reimbursed at a rate of 28.18%. Additional special education aid: Subject to appropriations, the state may reimburse an amount equal to 90% of the cost exceeding $30,000; if the appropriation is insufficient to cover the full amount of payments requested, the state department of education must prorate reimbursement amounts.	Distributed to LEAs, reimbursement.	All funds restricted to special education expenditures.
Wyoming	13,195	$19,344	$18,128 (2021)	Reimbursement based on actual costs per student. Statewide total reimbursements are capped based on the total reimbursement	Distributed to LEAs, reimbursement.	All funds restricted to special education expenditures.

State	2020 Child Count	Average Per-Child Total Revenue 2020	Average Per-Child Special Education Expenditures (Year Noted for Each State)	Allocation Methods	Distribution Methods	Expenditure Rules
				amount made during the 2018–19 school year.		

*** The study team could not find these data publicly available. Source: Publicly available information on state and other websites.**

Appendix B: Percentage of Special Education Students by Disability Category and District, 2021–22

District/BOCES	Autism Spectrum Disorders	Deaf-Blindness	Developmental Delay	Hearing Impairment, including Deafness	Intellectual Disability	Multiple Disabilities	Orthopedic Impairment	Other Health Impairment	Serious Emotional Disability	Specific Learning Disability	Speech or Language Impairment	Traumatic Brain Injury (TBI)	Visual Impairment, including Blindness
Adams 1, Mapleton	9.00%		9.57%	1.53%	0.00%	4.69%	0.00%	9.57%	4.31%	37.89%	21.91%	0.00%	0.00%
Adams 12, Northglenn-Thornton	11.07%	0.00%	12.30%	1.62%	1.90%	6.77%	0.00%	11.04%	3.41%	39.03%	12.09%	0.00%	0.00%
Adams 14, Commerce City	8.94%		12.75%	0.00%	2.15%	7.15%	0.00%	8.94%	3.34%	40.88%	14.18%	0.00%	0.00%
Adams 27J, Brighton	7.85%		11.92%	1.23%	1.02%	5.30%	0.68%	7.68%	3.44%	41.83%	18.16%	0.00%	0.00%
Adams 50, Westminster	7.86%		13.68%	0.00%	2.29%	5.38%	0.00%	6.88%	5.21%	43.07%	14.30%	0.00%	0.00%

District/BOCES	Autism Spectrum Disorders	Deaf-Blindness	Developmental Delay	Hearing Impairment, including Deafness	Intellectual Disability	Multiple Disabilities	Orthopedic Impairment	Other Health Impairment	Serious Emotional Disability	Specific Learning Disability	Speech or Language Impairment	Traumatic Brain Injury (TBI)	Visual Impairment, including Blindness
Adams-Arapahoe 28J, Aurora	7.50%	0.00%	11.02%	1.75%	3.72%	3.33%	0.00%	10.32%	3.09%	40.91%	17.41%	0.48%	0.00%
Arapahoe 1, Englewood	10.44%		10.92%	0.00%	0.00%	4.61%		4.37%	8.01%	41.50%	18.20%	0.00%	
Arapahoe 2, Sheridan	0.00%		10.00%	0.00%	0.00%	0.00%		0.00%	0.00%	53.75%	13.75%	0.00%	
Arapahoe 5, Cherry Creek	9.45%		11.77%	1.16%	1.77%	5.47%	0.33%	12.65%	6.07%	36.86%	13.85%	0.30%	0.25%
Arapahoe 6, Littleton	10.60%	0.00%	9.32%	0.93%	1.16%	4.46%	0.00%	15.46%	5.85%	34.97%	16.04%	0.00%	0.00%
Aspen 1	0.00%		0.00%	0.00%	0.00%	0.00%	0.00%	14.21%	0.00%	43.65%	21.32%		
Boulder RE1J, St. Vrain Valley	13.29%		13.59%	1.13%	2.07%	3.43%	0.39%	14.01%	4.00%	33.71%	14.08%	0.00%	0.00%
Boulder RE2, Boulder Valley	10.95%	0.00%	9.20%	0.73%	0.71%	4.26%	0.51%	17.39%	7.00%	32.15%	16.74%	0.00%	0.00%
Centennial BOCES	7.58%	0.00%	9.25%	0.00%	3.26%	4.32%	0.00%	10.84%	4.32%	37.62%	20.35%	0.00%	0.00%
Charter School Institute	6.38%	0.00%	5.45%	0.00%	1.13%	0.00%	0.00%	14.49%	3.99%	43.79%	21.99%	0.00%	0.00%
CMHI-Pueblo	0.00%				0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	
Colorado River BOCES	6.03%		10.20%	0.00%	0.00%	4.89%	0.00%	11.49%	5.89%	42.96%	15.52%	0.00%	0.00%

District/BOCES	Autism Spectrum Disorders	Deaf-Blindness	Developmental Delay	Hearing Impairment, including Deafness	Intellectual Disability	Multiple Disabilities	Orthopedic Impairment	Other Health Impairment	Serious Emotional Disability	Specific Learning Disability	Speech or Language Impairment	Traumatic Brain Injury (TBI)	Visual Impairment, including Blindness
Colorado School for the Deaf and Blind	0.00%	0.00%	0.00%	52.44%	0.00%	12.20%		0.00%	0.00%	0.00%			27.44%
Delta 50(J), Delta	5.21%		9.77%	0.00%	0.00%	4.30%	0.00%	9.51%	2.34%	45.70%	19.92%	0.00%	0.00%
Denver 1, Denver	9.02%	0.00%	8.94%	1.04%	2.87%	3.80%	0.00%	12.54%	4.14%	43.20%	13.44%	0.50%	0.27%
Department of Corrections					0.00%			0.00%	0.00%	0.00%			
Division of Youth Corrections					0.00%	0.00%		0.00%	53.33%	0.00%	0.00%	0.00%	
Douglas Re 1, Castle Rock	10.50%	0.00%	9.21%	0.81%	1.62%	4.68%	0.00%	14.01%	4.96%	38.46%	14.91%	0.37%	0.25%
Durango	10.07%		14.45%	0.00%	0.00%	3.21%	0.00%	14.74%	7.59%	32.85%	13.43%	0.00%	0.00%
Eagle Re 50, Eagle	6.03%		15.30%	0.00%	0.00%	3.13%	0.00%	9.16%	2.26%	45.26%	16.38%	0.00%	0.00%
East Central BOCES	5.32%		8.31%	1.20%	1.26%	5.12%	0.00%	12.97%	5.52%	40.89%	18.95%	0.00%	0.00%
Education ReEnvisioned BOCES	12.62%		0.00%	0.00%	0.00%	0.00%	0.00%	15.44%	5.65%	46.52%	11.30%	0.00%	
El Paso 11, Colorado Springs	9.50%	0.00%	7.04%	1.19%	2.87%	5.44%	0.63%	11.77%	3.35%	34.56%	22.98%	0.00%	0.00%
El Paso 12, Cheyenne Mountain	11.02%		7.35%	0.00%	0.00%	4.99%	0.00%	19.69%	4.99%	26.25%	21.52%	0.00%	0.00%
El Paso 2, Harrison	10.25%		9.33%	0.00%	2.87%	6.71%	0.00%	11.71%	4.82%	36.36%	16.47%	0.00%	0.00%

District/BOCES	Autism Spectrum Disorders	Deaf-Blindness	Developmental Delay	Hearing Impairment, including Deafness	Intellectual Disability	Multiple Disabilities	Orthopedic Impairment	Other Health Impairment	Serious Emotional Disability	Specific Learning Disability	Speech or Language Impairment	Traumatic Brain Injury (TBI)	Visual Impairment, including Blindness
El Paso 20, Academy	13.27%	0.00%	5.97%	1.65%	1.24%	6.52%	0.00%	17.13%	3.95%	31.86%	17.13%	0.00%	0.00%
El Paso 3, Widefield	5.73%		10.01%	0.00%	2.18%	4.76%	0.00%	14.53%	3.79%	35.59%	21.63%	0.00%	0.00%
El Paso 38, Lewis-Palmer	10.81%		5.41%	0.00%	0.00%	5.55%		22.19%	3.41%	36.27%	13.94%	0.00%	0.00%
El Paso 49, Falcon	7.52%		5.97%	1.25%	2.65%	4.28%	0.00%	15.56%	4.87%	43.66%	13.31%	0.00%	0.00%
El Paso 8, Fountain	15.48%		10.47%	0.00%	2.33%	3.14%	0.00%	14.54%	4.20%	24.68%	23.55%	0.00%	0.00%
Elizabeth School District	6.39%		10.22%	0.00%	0.00%	6.71%		16.93%	5.11%	38.66%	14.06%	0.00%	
Fort Lupton/Keenesburg	10.80%		13.41%	0.00%	3.48%	2.79%	0.00%	8.01%	2.79%	39.02%	16.38%	0.00%	0.00%
Fremont RE-1, Canon City	5.42%		17.97%	0.00%	2.88%	4.75%	0.00%	10.34%	4.75%	33.05%	18.14%	0.00%	0.00%
Gunnison	9.24%		11.96%	0.00%	0.00%	0.00%		12.50%	0.00%	52.17%	0.00%	0.00%	
Jefferson R-1, Lakewood	9.57%	0.00%	7.73%	1.37%	1.16%	4.35%	0.33%	12.00%	5.73%	39.29%	17.74%	0.00%	0.37%
Larimer R-1, Poudre	11.53%		9.63%	0.92%	2.49%	4.32%	0.00%	17.28%	4.39%	36.09%	12.23%	0.59%	0.00%
Larimer R-2J, Thompson	8.67%	0.00%	13.03%	0.98%	1.86%	3.92%	0.00%	11.12%	4.31%	29.50%	25.38%	0.00%	0.00%
Larimer R-3, Park	0.00%		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	36.84%	0.00%	0.00%	0.00%

District/BOCES	Autism Spectrum Disorders	Deaf-Blindness	Developmental Delay	Hearing Impairment, including Deafness	Intellectual Disability	Multiple Disabilities	Orthopedic Impairment	Other Health Impairment	Serious Emotional Disability	Specific Learning Disability	Speech or Language Impairment	Traumatic Brain Injury (TBI)	Visual Impairment, including Blindness
Logan RE-1, Valley	9.18%		8.54%	0.00%	6.65%	0.00%	0.00%	9.81%	0.00%	41.46%	15.51%	0.00%	0.00%
Mesa	9.83%	0.00%	12.00%	0.84%	2.95%	2.02%	0.00%	15.91%	5.17%	37.20%	13.08%	0.00%	0.00%
Moffat Re 1, Craig	5.62%		15.98%	0.00%	0.00%	0.00%	0.00%	14.20%	0.00%	35.80%	17.16%	0.00%	
Montrose RE-1J, Montrose	6.00%		10.67%	0.00%	1.63%	2.54%	0.00%	11.99%	4.07%	47.05%	14.74%	0.00%	0.00%
Morgan RE-3, Fort Morgan	5.84%		10.79%	0.00%	0.00%	0.00%	0.00%	6.52%	6.97%	45.84%	18.20%	0.00%	
Mount Evans BOCES	16.14%		0.00%	0.00%	0.00%	0.00%		11.21%	8.07%	33.18%	19.28%		0.00%
Mountain BOCES	6.77%		14.85%	0.00%	0.00%	0.00%	0.00%	7.52%	5.83%	43.42%	15.04%	0.00%	0.00%
Northeast Colorado BOCES	9.77%		10.93%	0.00%	2.57%	2.31%	0.00%	14.78%	4.50%	33.42%	19.67%	0.00%	0.00%
Northwest Colorado BOCS	6.78%	0.00%	6.78%	0.00%	0.00%	4.04%	0.00%	16.74%	2.74%	46.46%	12.99%	0.00%	0.00%
Pikes Peak BOCES	6.66%		13.00%	0.00%	0.00%	2.69%	0.00%	14.90%	4.12%	39.62%	13.95%	0.00%	0.00%
Pueblo 60, Urban	11.21%		6.99%	0.00%	7.85%	4.21%	0.00%	11.06%	4.02%	43.87%	9.72%	0.00%	0.00%
Pueblo 70, Rural	6.95%		9.13%	0.00%	2.38%	5.23%	0.00%	13.30%	3.77%	44.80%	12.97%	0.00%	0.00%
Rio Blanco BOCES	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	51.43%	16.00%	0.00%	
Roaring Fork	7.92%		9.29%	0.00%	0.00%	4.48%	0.00%	10.33%	5.16%	52.67%	6.71%	0.00%	0.00%

District/BOCES	Autism Spectrum Disorders	Deaf-Blindness	Developmental Delay	Hearing Impairment, including Deafness	Intellectual Disability	Multiple Disabilities	Orthopedic Impairment	Other Health Impairment	Serious Emotional Disability	Specific Learning Disability	Speech or Language Impairment	Traumatic Brain Injury (TBI)	Visual Impairment, including Blindness
San Juan BOCES	10.15%	0.00%	11.35%	0.00%	2.95%	4.24%	0.00%	12.64%	6.09%	39.76%	10.06%	0.00%	0.00%
San Luis Valley BOCS	4.93%		10.11%	0.00%	0.00%	5.05%	0.00%	8.42%	2.29%	52.23%	13.36%	0.00%	0.00%
Santa Fe Trail BOCES	5.02%		16.96%	0.00%	2.94%	0.00%	0.00%	6.23%	0.00%	53.63%	10.03%	0.00%	0.00%
South Central BOCES	7.35%		14.69%	0.00%	0.00%	0.00%	0.00%	10.68%	0.00%	39.40%	20.53%	0.00%	0.00%
Southeastern BOCES	7.43%	0.00%	8.28%	0.00%	0.00%	0.00%	0.00%	8.70%	0.00%	32.27%	36.52%	0.00%	
State Total	9.24%	0.03%	9.80%	1.19%	2.12%	4.32%	0.34%	12.64%	4.57%	38.93%	16.15%	0.39%	0.28%
Summit Re-1	0.00%		15.76%	0.00%	0.00%	0.00%	0.00%	14.29%	5.91%	46.31%	8.62%	0.00%	0.00%
Uncompahgre BOCES	9.21%		19.30%	0.00%	0.00%	0.00%	0.00%	9.21%	0.00%	42.54%	12.28%		12.28%
Ute Pass BOCES	11.24%		8.65%	0.00%	0.00%	6.34%	0.00%	14.99%	6.92%	32.56%	13.54%	0.00%	0.00%
Weld 6, Greeley	6.77%	0.00%	4.72%	1.68%	1.87%	3.18%	0.00%	9.29%	3.22%	41.16%	26.78%	0.00%	0.00%
Weld RE-4, Windsor	7.67%		9.18%	0.00%	0.00%	7.55%	0.00%	13.58%	3.52%	31.82%	22.89%	0.00%	0.00%
Weld Re-5J, Johnstown	7.38%		4.77%	0.00%	0.00%	4.99%	0.00%	7.81%	4.12%	41.21%	26.46%		0.00%

Source: CDE December Child Count Data, 2022.