Implementation of RtI as a Part of Multi-Tiered Systems of Support: What Teachers, Administrators, and Teacher Educators Need to Know

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Abstract
Multi-tiered Systems of Support (MTSS) is an outgrowth of Response to Intervention (RtI). The various systems of support for students and school communities provided through these programs are integral to modern education and embedded in the Individuals with Disabilities Education Improvement Act (IDEIA) of 2004. While there are many benefits to the implementation of MTSS and RtI, there are various obstacles that can hinder successful intervention programs. The absence of consensus across districts and states with respect to program development and implementation creates confusion. This article addresses considerations and concerns related to MTSS and RtI. Discussed are underlying principles, challenges to effective implementation, expertise and training of teachers, and usage for classification for special education services. The roles of general and special education teachers, administrators, and university preparation programs are examined, and recommendations provided.

Keywords
response to intervention, multi-tiered systems of support, specific learning disabilities, special education classification

Response to Intervention (RtI) became a functional extension of the Individuals with Disabilities Education Improvement Act [IDEIA] (PL108446) reauthorized in 2004. The law made intervention services possible for K-12 students who were struggling with specific skill deficits in both learning and behavior (King & Coughlin, 2016). The express purpose of these interventions was the remediation of skill deficits, as well as offering a second methodology to determine whether a specific learning disability (SLD) exists (Berkeley et al., 2020). Rather than continuing with the traditional discrepancy model for evaluation and provision of special education services, RtI offered an alternative to addressing skill deficits before these gaps grew large enough to make remediation of skill too difficult (Pullen et al., 2018). In shifting away from the...
discrepancy model, the IDEIA provided an alternate data-based approach for identification and classification of students with a SLD due to continued poor academic performance, documented over time via the tiered instruction the RtI model provides.

Over the last ten years, the nomenclature has changed; RtI is now considered a part of Multi-Tiered Systems of Support (MTSS; Berkeley et al., 2020). MTSS can be viewed as an umbrella term for a multi-faceted system of support addressing all areas of child development, often incorporating RtI, social/emotional learning, school-wide positive behavioral systems, and community linkages to name a few (Schiller et al., 2020). In addition, MTSS addresses concerns for staff, as well, with a focus on developing a strong and positive culture and climate within the school building.

MTSS can also be utilized as a method for addressing aspects of equity in education through culturally sustaining pedagogies and practices (Mercado, 2018). Given the overrepresentation of children who are culturally and linguistically diverse receiving special education services (Barrio, 2020), MTSS provides data-based alternatives addressing the whole child, which can help to reduce the disproportionality often found in special education classrooms (Mercado, 2018). According to Cartledge, Kea, Watson and Oif (2016), “response to intervention (RtI) and culturally relevant pedagogy (CRP), both independently and collectively are considered to offer promise for mitigating conditions of overrepresentation in special education programs” (p.29). The use of RtI as a part of identification for SLD helps to move past debates about evaluation tool bias (Reynolds et al., 2020), and instead provides a full picture of the student being evaluated using the context of classroom-based activities. Through a successfully implemented MTSS program, CRP and RtI can be effectively implemented across the school building, as school-wide support systems are in place.

While there are many promising aspects for remediation of skills and a more equitable methodology for identification of students with SLD, there continues to be issues surrounding effective implementation of MTSS, and more specifically, RtI. The purpose of this article is to help strengthen effective implementation of these programs. To do so, we analyze three important aspects of MTSS. We initially explore the theory and underlying principles of MTSS and RtI programs. We then examine challenges to effective implementation, specifically considering the importance of structure, the expertise of individuals charged with implementing interventions, the practices of data collection, and the overall effectiveness of MTSS/RtI in reducing the number of students being classified for special education. Finally, we examine the use of RtI data as the basis for classification of an SLD leading to special education services. There are important questions in this area, such as who makes the decision to implement this, what criteria are utilized, and how the process is conducted. From this research, we then extrapolate implications for practice and recommendations for improved implementation of RtI within MTSS structures. Roles of general education and special education teachers, administrators, and university preparation programs are discussed in analyzing how the MTSS process can be improved.

**MTSS/RtI: Principles, Challenges, and Effectiveness**

Under the umbrella of MTSS, there are many factors for school leaders and teacher educators to consider. MTSS is not a singular program implemented in a few classrooms; rather, it is a school-wide program encompassing almost every aspect of the school (Schiller et al., 2020).
This includes pedagogy and curriculum, as well as behavioral systems and counseling programs. Administrators need to be aware of the far-reaching impacts of MTSS programs, and they need to ensure that programs are implemented with fidelity for positive outcomes (Sailor et al., 2020). This is also true for teacher-educators and coaches who need to be fully aware of the demands that are faced by teachers in K-12 classrooms (Nelson & Bohanon, 2019). Future teachers and in-service teachers need to be prepared and equipped with the knowledge and tools necessary to meet the challenges and demands of MTSS programs.

One major area of focus under the MTSS umbrella is the use of Response to Intervention. This is a foundational program that is embedded in all schools, which uses a specific framework to address students’ learning and behavioral needs preceding the advent of MTSS (Pullen et al., 2018). The underlying theory behind MTSS is rooted in the tiered system of support from RtI, as well as elements of Positive Behavioral Interventions and Supports (PBIS) (Sailor et al., 2020). Within this approach also lies notions of inclusive education through differentiated instruction and Universal Design for Learning (UDL), rooted in the context of a whole child framework (Rose & Meyer, 2002).

Universal Design
A major underlying principle of all programs is effective teaching practices meeting the diverse needs of students in the classroom. One such practice that is beneficial to most students is UDL. UDL should not be viewed as a technique separate and apart from general education; rather, it needs to be viewed as another tool focused on helping all students succeed (Capp, 2017). This will often require providing support to students who require differentiated approaches to access the general education curriculum (Tomlinson & Imbeau, 2023). By extending differentiated instruction to all students, UDL demystifies differentiation of instruction and helps meet learners’ specific needs. MTSS embraces UDL because the focus is on school-wide systems of support to meet students’ needs academically, behaviorally, and emotionally (Basham et al., 2010). By utilizing UDL principles of inclusive education, students with disabilities are engaged with peers in the least restrictive environment, which has both academic and emotional benefits (Lowrey et al., 2017).

When thinking of implementing UDL in the school system, whether at the building level or district-wide, it is helpful to design an instructional toolkit that utilizes UDL instructional design to support scientifically based instructional practices, learning strategies, and technology supports across tiered instruction (Polirstok & Lee, 2019). Use of UDL strategies can help to differentiate instruction for students while tiered instruction is taking place and bridge classroom instructional practices with the more student-centered MTSS practices. This lies at the heart of MTSS and remains a core aspect of its foundational principles of tiered instruction and support.

Three-Tier Structure of RtI
Balu et al. (2015) explain that full implementation of the RtI framework includes four key components: administration of universal screening assessments at least twice a year, use of at least three tiers of increasingly intense academic instruction, data-driven placement of students in tiers of instruction, and intermittent progress monitoring to determine if the interventions
are yielding improved student achievement. According to Fuchs and Fuchs (2017), most important in this fluid framework is the teach-test-reteach-retest process, maintaining accountability and ensuring that foundational learning is acquired and maintained over time. This framework provides a roadmap for teachers across grade levels to screen students to determine areas of deficit as soon as possible, and to then implement research-based interventions in a timely manner to avoid widening performance gaps (Thomas et al., 2020). Within special education services, RtI plays a pivotal role in the data collection process for evaluations, as well as providing a means for classification for specialized services under the SLD classification (Raben et al., 2019).

Under the MTSS umbrella, the RtI program typically involves three separate and distinct tiers (Pullen et al., 2018). RtI interventions are tiered services that are provided for academics, behaviors, and socioemotional learning (Mazrekaj & De Witte, 2023). It is pivotal to consider the post-pandemic academic and social/emotional concerns facing education professionals when discussing the need for tiered services in all areas. Prior to the concerning levels of reading and mathematics achievement post Covid-19 (National Center for Educational Statistics, 2022), there has been a history of concerns regarding reading and literacy. Research prior to the 2020 pandemic revealed that the majority of students with learning disabilities had significant difficulties with literacy (Ferrer, Shaywitz, Holahan, Murchione, & Shaywitz, 2010; McGill et al., 2020). This makes RtI and intervention services of any type essential in post-pandemic education.

With RtI being a foundational aspect of MTSS, it is important to understand the tiered system of services that comprise the framework. Beginning with universal screeners, all students are evaluated in some manner to determine levels of performance and areas of possible concern (VanMeveren et al., 2020). From this screening, tiered services begin. All students, regardless of performance on screenings and benchmarks receive Tier 1 instruction (Arden & Benz, 2018).

Tier 1 is instruction that all students in the classroom receive. For example, in the area of literacy, grade-level reading instruction is presented to all students using well-established, evidence-based, highly effective code-based and text-based instructional strategies that underlie word identification and comprehension (Gersten et al., 2009). According to Arden and Petimonti (2017), “research tells us that when instructionally sound core instruction is delivered with fidelity, only 15% of students may need Tier 2 supports” (p. 19). Students underperforming in the grade-level instruction are placed into Tier 2 services via progress monitoring and data collection, or they might have been identified through screeners and benchmarks for Tier 2 services. One example of a Tier 2 service is small group supplemental reading instruction with five to seven students provided for 20-40 minutes several times a week, to build on and extend foundational reading skills students are already receiving in Tier 1 (Gersten et al., 2017). Tier 2 programming typically targets students who are comparatively at the bottom 20-25% in relation to their peers (Solari et al., 2017).

It is at the Tier 2 stage when inconsistencies develop, thus impacting RtI’s effectiveness. These inconsistencies can be found in various aspects of RtI implementation. One major concern during the provision of services in Tier 2 is who the district or school designates to provide those services. According to Solari et al. (2017), the instructor could be a classroom teacher, reading specialist, special education teacher, or another qualified teacher. The
differences between these professionals in terms of preparation and training certainly can be a critical factor when evaluating the overall effectiveness of the intervention framework. The fact that states do not specify: the type of training teachers should have completed to effectively implement Tier 2 services, the number of years of overall prior teaching experience needed to inform Tier 2 intervention, or the nature of the supervision a teacher implementing Tier 2 services should be receiving, makes comparing student progress from school to school, district to district, or state to state virtually impossible. It is also reasonable to consider that teacher evaluations should be taken into account, and, in a perfect world, more effective teachers should be teaching the students in need of more support.

Questions also develop regarding the timeliness of interventions (Preston et al., 2016). For example, after weeks of intervention in Tier 2, how are decisions made to extend the intervention for another six to eight weeks, or is another intervention utilized, or is the student moved to Tier 3? There is a lack of established criteria, as well as differences in who makes these decisions across schools, districts, and states (Savitz et al., 2018; Silva et al, 2021). This can become even more problematic when this data is used for classification purposes, as each state might use different criteria; at the heart of the differences in established criteria and processes lies the very disproportionality MTSS is supposed to prevent.

While typical application of tiered intervention is thought of as more specifically prescribed, the fluidity of movement between tiers as suggested by Preston et al. (2016), may very well be the answer to helping students who appear “stuck.” In other words, after providing Tier 3 individualized service to a student that successfully addressed a particular gap in his or her skill set, there can be a return to Tier 2 services. These questions raised by Preston et al. (2016) suggest the need for examining RtI practices in terms of: 1) specific criteria for selecting teachers to implement Tier 2 interventions, 2) specific criteria for selecting teachers to implement Tier 3 interventions, 3) knowledge of specific scientifically validated instructional materials to be used in tier 2 and tier 3 interventions, and 4) the ability to move students more fluidly from one tier to another based on specific skill needs.

While teacher training and professional development is one component for evaluating RtI effectiveness, another is that school districts or LEAs have the flexibility to design their own RtI/MTSS intervention models. This means that each district, and in some cases each school within a district, have the ability to identify the frequency of instruction, the duration of instruction, and the types of intervention strategies aligned with each tier (Silva et al., 2021). This flexibility challenges what the literature reports as “ideal models,” recognizing that no school district’s programming with respect to MTSS is “ideal,” but rather child and program specific to unique needs involving time and staff resources. Coyne et al. (2018) stressed the importance of implementing tiered interventions with consistency and commitment; programs may differ, but the integrity of the intervention needs to be preserved. This notion of the integrity of the intervention makes comparisons of program effectiveness across schools, districts, or states difficult to assess.

For students who are not making reasonable progress after Tier 1 and Tier 2 interventions, and who continue to fall below grade level expectancies, the final and most intensive interventions are implemented at Tier 3 (Balu et al., 2015). Tier 3 provides the most individualized instruction, in many cases one to one instruction, to students underperforming and not responding to interventions (Arias-Gundín & García Llamazares, 2021). Again,
inconsistencies emerge at this tier with the same questions posed earlier about Tier 2 services. This includes instructional time received per week, differences in the staff preparation providing services, and the choice of specialized intervention programs implemented. In addition, these factors seriously impact the ability to determine overall MTSS/RtI effectiveness. Any attempt to compare student progress state-wide (or district wide) as a consequence of Tier 3 services cannot be definitive because of all the variability underlying the interventions and procedures found in each school/district (Barrett & Newman, 2018).

If students continue to struggle during Tier 3 services, some of these students may become eligible for special education services. In fact, highlighting another inconsistency found among districts and states, some models of MTSS/RtI definitively designate Tier 3 as special education (Alahmari, 2019). There is little to no guidance about how this process happens. Some states will still conduct intelligence and achievement testing to determine a discrepancy even after Tier 3 services. The research is now seeming to move towards the MTSS/RtI Tier 3 model as a classification tool for a SLD, adding a focus on Patterns of Strengths and Weaknesses (PSW) as a better overall indicator of a SLD. McGill et al. (2020) highlight how current thinking around the diagnosis of a SLD has changed:

Evidence for the presence of a cognitive processing disorder or a significant discrepancy between measured IQ and achievement are no longer required for diagnosis. Instead, the core diagnostic feature in DSM-5 is the presence of academic dysfunction that is resistant to remediation (p. 4).

The IDEIA of 2004 utilizes similar language, stating that “in determining whether a child has a specific learning disability, a local educational agency may use a process that determines if the child responds to scientific, research-based intervention as a part of the evaluation procedures” (20 USC 1414(b)(6)).

Student progress, or lack thereof, can be clearly documented through interventions in Tiers 1, 2 and 3, providing a detailed record of student strengths and weaknesses and skills mastered. Having this record supersedes the “wait to fail” model of assessment that is noted in IDEIA (2004) and provides much detailed data about student success with various research-based interventions. Key to the eligibility of having students identified for special education using the RtI model is the validity of the process (Silva et al., 2021). Essential questions are raised when examining the validity, such as to what extent did the teacher implement the intervention with fidelity, was there sufficient RtI intervention in terms of time, and what growth if any was noted. In addition, questions around data collection procedures, progress monitoring, and appropriate time to determine the effectiveness of an intervention are pivotal considerations for determining whether a student might need specialized services or not (Silva et al., 2021).

With these concerns in mind, it is important to note that there are some resources available to help school districts or LEAs in developing an effective process. The RtI Action Network provides an online RtI-based SLD identification toolkit that can help districts in determining SLD eligibility (rtinetwork.org/getstarted/sld-identification-toolkit). This network also provides state case studies highlighting how different states have been approaching this issue. With RtI being a way to classify students with a SLD, the processes used in other states is worthy of consideration (Gartland & Strosnider, 2020).

A final consideration for the fluidity of the tiers and the possible identification of a
learning disability is that as the tiers of intervention become more individualized and specialized, students’ needs more clearly emerge (Arden & Benz, 2018). The move to classification for special education services in and of itself will not result in student success, nor is it expected to guarantee success (Markelz & Nagro, 2022); rather, the nature of the specialized program, the minutes devoted each week to individualized intervention, the training and preparation of the teacher, the appropriateness of intervention, and intervention fidelity will make the difference with respect to students meeting grade level expectations (Thomas et al., 2020).

Barriers to Implementation: Lack of Clarity and Consistency
Implementing a successful MTSS program is not an easy undertaking, as there are numerous considerations impacting a program’s effectiveness. While the idea of addressing students’ needs before they become the basis for special education services is certainly a warranted idea, the confusion around which pre-classification services should be provided, by whom, and how often, give rise to much confusion within a given school, district, and/or state (Gartland & Strosnider, 2020). From one school to another within a given district, one can often observe significant differences in how MTSS services are provided, the nature of those services, and the skill level of teachers charged with providing those services (Barrett & Newman, 2018). More broadly, what one district codifies as expected practices for MTSS may be quite variable from what another district within the same state might require of its teachers (Barrett & Newman, 2018).

Contributing to the confusion of MTSS is its use as an intervention framework to address learning and behavioral needs, as a data collection tool for a SLD identification and classification, and as a possible measure to reduce disproportionality in special education programs (Mercado, 2018). How much emphasis should a school, district, or state place on one or more of these purposes? In making such determinations, to what extent does the nature of the MTSS program change?

Furthering the confusion are the differences in administrative guidance governing the provisioning of MTSS services between states, especially geographic neighbors. While some practices can be seen as “lock-step between states,” MTSS practices in state guidance continue to have significant differences in implementation. According to Savitz, Allington and Wilkins (2018), there is a lack of national consensus on how to use RtI data for a specific learning disability identification. The lack of clarity here may be attributed to the language of the IDEIA (2004), which states that a district “may” use RtI as a classification method. This lack of clearly delineated language, practices, and timelines make RtI implementation inconsistent and often difficult to ensure compliance. McGill et al. (2020) report that “in a survey, Maki and colleagues (2015) found that 67% of states continue to use the discrepancy method, 16% require the use of RtI procedures as a primary method of LD identification, and 28% now permit use of a PSW approach” (p.18).

Aside from the concerns of states using different and varied criteria for administrators and educators, there are also important considerations for families who have children receiving special education services. If one state uses a specific model, and the family moves to another state, the provision of services could be called into question (Zigmond & Kloo, 2017). The inconsistencies can be troublesome for families, who might be unaware of these nuances in
state administrative codes as they prepare to change schools or move to other states.

**Barriers to Implementation: Teacher Preparation and Structures**

Current research demonstrates that general education teachers in each school where MTSS/RtI is being implemented often do not know the nature and extent of support students are receiving, even students in their own classes (Bineham et al., 2014). From state to state and district to district, schools are left to interpret implementation on their own, which can explain why RtI does not always prove successful in reducing the number of children with significant reading deficiencies (Berkeley et al., 2020; Sharp et al., 2016). Too much variability in the nature of the intervention program, the skill of the staff providing the services, and the fidelity to the intervention program itself contribute to the variability of findings (Berkeley et al., 2020). In addition, teacher preparation programs do not provide sufficient training in intervention usage and inclusive education (Hogan, 2023). This is problematic, as the general education teacher is at the forefront of monitoring for skill deficits to begin remediation and tiered services.

In addition, other barriers can hinder application of RtI in classrooms. One such barrier is identifying time during the day to provide the necessary instructional interventions, regardless of what name is given to the tiered instruction. There are concerns over students missing instructional time in the classroom while receiving intervention services (Berkeley et al., 2020). Moreover, many teachers have limited understanding of RtI practices and intervention models (Sabnis et al., 2020), as well as limited training in inclusive education practices involving intervention services (Hogan, 2024). These are unintended barriers that weaken the RtI framework.

**Addressing Issues of Equity in Special Education**

The adoption of the MTSS process has generated some interesting ideas about reducing the number of children from being classified for special education services. While the number of special education referrals remain seemingly constant over time, diagnoses have shifted from SLD to Autism and/or Other Health Impaired and Developmental Disabilities, thereby making it appear that the number of students with SLD have been the same overtime (National Center for Educational Statistics, US Department of Education, 2016).

In the face of this, Gartland and Strosnider (2020) have argued strongly for the improvement of Tier 2 services, to reduce formal classification of students for special education, especially students from culturally and linguistically diverse backgrounds. Tier 2 services emerge at a critical time in the intervention process. The success of Tier 2 services can eliminate the need for students to advance to more intensive intervention in Tier 3, as well as the point in the process where students could be classified as having a SLD. According to Roben, Brogan, Durham and Contreras Bloomdahl (2019), cognitive ability is not considered when using an MTSS/RtI approach unlike the discrepancy model approach.

According to the IDEIA, evaluation for special education services must not be delayed due to inconsistency with how RtI progress-monitoring data are incorporated into a comprehensive evaluation (Gartland & Strosnider, 2020). Other forms of data and evaluation, aside from RtI progress monitoring, need to be utilized. In the same way that special education evaluations require a multidisciplinary approach to evidence gathering, a broader approach to
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Identification is necessary beyond RtI (Gartland & Strosnider, 2020). Informal assessment measures, such as interviews, observations, and classroom specific data need to be included in an evaluation to develop a true learning profile of the student (Benedict et al., 2022). These measures provide various focal points that can assist in eliminating various factors, such as attendance, lack of instruction, medical concerns, etc. as being at the root of the skill deficits. By examining contextual factors, in addition to progress monitoring data, the need for classification might be eliminated (Gartland & Strosnider, 2020). By shifting away from a discrepancy model focused on standardized test scores, more variables are examined to make this determination.

Evaluation should embrace both formal and informal assessment data in identifying students as having special education needs (Benedict et al., 2022); if documented well, the RtI process can provide important insight on how a child learns and what interventions and instructional materials would be most appropriate (Silva et al., 2021). While this can inform special education services and IEP development should a student become eligible for classification, this same data can be used to offer alternate perspectives negating the need for classification, should the student be successful in responding to interventions.

The disproportionality of culturally and linguistically diverse students identified for special education has been documented in the literature going back to the late 1970s (Morgan, 2020). More recent discussions of disproportionality highlight not only the overrepresentation of culturally and linguistically diverse children in classes for special education, but also the underrepresentation of these diverse children in classes for the Gifted and Talented (List & Dykerman, 2021). Exploring the need for Gifted and Talented Programs, the differences in criteria and evaluation from district to district and state to state, and the extent to which that process fits into MTSS, is an important topic warranting further research and discussion.

Improving MTSS Interventions via Technical Centers and Professional Development

Due to the constant and rapid evolution of RtI/MTSS, many federally and state funded technical assistance centers have been created to help state and local education agencies navigate implementation, evaluating models of RtI/MTSS, and best practices (Schiller et al., 2020). These agencies include, but are not limited to, National Center on Student Progress Monitoring, National Center on Response to Intervention, National Center on Intensive Intervention (NCII), RtI Action Network, State Implementation and Scaling-up of Evidence-based Practices Center (SISEP) and the Center on Multi-Tiered System of Supports.

Every state and local agency chooses whether to partner with these technical agencies to receive comprehensive support over time to anticipate high quality implementation that will most likely yield student success (Arden et al., 2017). To determine RtI success over time, it would be important to track which states and local education agencies (LEAs) participate formally with these technical agencies and whether there are differences ultimately in student success. This can help to determine what percent of students improved sufficiently each year to move them out of RtI interventions in a given school, district, or state.

Successful RtI/MTSS interventions will require teachers and administrators to be trained to competently implement interventions and to be able to access a variety of
scientifically validated instructional materials to address student needs (Sailor et al., 2020). Teacher preparation programs need to enhance courses and field experiences for teacher-candidates to become prepared for the realities of today’s classroom, often including MTSS procedures and inclusion settings (Hogan, 2024). For teachers to have the skills and materials necessary for success, teacher preparation programs at the pre-service level must provide comprehensive MTSS training in coursework as well as in clinical internships:

Beyond merely emphasizing the theoretical importance of collaboration, preparation programs have an opportunity to unpack steps to fostering dialogue between general and special educators about differentiation, accommodation, and relevance in relation to the content in Tier 1. Similarly, programs can create learning experiences that prepare general and special educators to anchor their discussions about ‘responsiveness’ and ‘effective intervention’ in valid and reliable data across Tiers 2 and 3. These topics must also extend to educational leadership programs given administrators’ key role in developing school-wide structures and systems such as RtI (Dulaney, 2013; Murakami-Ramalho & Wilcox, 2012; Gomez-Njarro, 2020, p. 123).

Similarly, at the in-service level, professional development in MTSS is both lacking, and when available, not effective, especially in regard to addressing disproportionality (Sabnis et al., 2020). Another issue of concern related to RtI training at the in-service level, is that “most RtI programs did not serve a systematic role in creating collaboration opportunities across general and special educators until the referral stage” (Gomez-Njarro, 2020, p. 124). While there is the guise that RtI successfully bridges the general education-special education divide, Gomez-Njarro’s work still sees these two systems as siloed and requiring special educators to have “a seat at the table” early on. Too often, general educators have very limited knowledge and training in specialized services even when serving in an inclusion classroom setting (Hogan, 2023).

Furthermore, effective RtI tiered services utilize the principles of Universal Design for Learning (UDL). All teachers (and their supervisors) should have prior training on how to use UDL each day in their classrooms (Basham et al., 2010). The key to inclusive education relies on the notion of differentiation, and UDL provides the framework for implementation. Having a toolkit of UDL strategies and intervention is a key aspect to any school seeking to implement UDL across classrooms (Polirstok & Lee, 2019).

**Recommendations to Strengthen Consistency in MTSS Implementation**

Helping students who are struggling, both academically and socially/emotionally, is an important mission for schools. Keeping culturally and linguistically diverse children from being disproportionately identified for special education is equally as important. To address both concerns, MTSS/RtI offers a pre-referral, multi-tiered intervention process to help children primarily overcome learning and/or behavioral challenges (Pullen et al., 2018). MTSS is a complicated program, not so much conceptually as it is with respect to implementation. While flexibility provided to LEAs allows for creativity in programming, RtI may very well be the exception to this rule (Savitz et al., 2018). The variability in what kinds of services is provided in each tier, the amount of time allotted for intervention in each tier, the training and expertise of those who provide these services, access to scientifically validated instructional materials, and
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For MTSS interventions to be successful, teachers and administrators must have the time necessary to work collaboratively on how best to support students (Gomez-Najjro, 2020). Acquiring the skills necessary to be effective providers of MTSS/RtI, teachers must have pre-service training in collaboration and reading interventions, provided both via coursework and clinical internships (Skaar et al., 2022). At the in-service level, professional development to maximize MTSS outcomes need to be provided by reading specialists and/or interventionists and/or basic skills instructors within each school, not via isolated workshops but integrated each week within the tiered interventions being provided (Albritton et al., 2018). Professional Learning Communities can also be a valuable tool in identifying the skills teachers believe they need to enhance MTSS interventions.

School administrators and teacher educators themselves need to learn the theories and procedures necessary to create and train teachers in effective MTSS interventions (Castillo et al., 2018). School administrators, as consumers of progress data on individual student and program performance, need to be able to assess the integrity of MTSS interventions, lead teachers in discussions involving how to improve services, and identify additional supports and training that would be valuable to teachers. School administrators need to hone their skills in this area to be effective instructional leaders (Hallinger et al., 2020).

In considering the current state of MTSS intervention and the stark differences in implementation across tiers, schools, districts, and states, the following recommendations address how to maximize service to students:

1. Every school district should have an administrator, typically the curriculum director or director of student support services, who is in charge of MTSS. This district administrator should be the person charged with MTSS program quality, staff training, data analysis and collaboration with the district Director of Special Services (Eaves et al., 2021). All teachers engaged in MTSS interventions in a given district should receive the same training; evaluation of teacher performance in MTSS implementation should employ the same criteria across the district (Barrett & Newman, 2018; Savitz et al., 2018). Those teachers not directly involved with MTSS implementation should have the opportunity to learn about tiered instruction and receive updates regularly on the progress of any students that they teach who may have received MTSS.

2. At the State Education Department level, MTSS Administrators and Directors of Special Education should receive comprehensive training around how best to implement MTSS and develop criteria regarding how to monitor MTSS program and teacher effectiveness. The challenge is to adopt evaluation criteria that are consistent across districts and schools in a given state and develop reporting structures that would inform the evaluation process about effectiveness of tiered instruction using specific methods and materials.

3. Teacher preparation programs need to be included in state-wide decision making about how to strengthen MTSS programming in schools. Teacher education courses that bridge general education and special education need to include MTSS in both theory as well as in clinical internships (Sailor et al., 2020). Nationally, the American
Association of Colleges for Teacher Education and their state affiliates, need to engage in seminars for teacher educators to deepen their knowledge about MTSS. Grant opportunities for colleges and universities to build MTSS training into their teacher education programs need to be made available at the local, state, and national levels (Choi et al., 2022).

4. Local schools should provide ongoing professional development via professional learning communities, with a study focus on UDL, differentiated instruction, second language learning, specific learning disabilities and MTSS (Castillo et al., 2022).

5. With regard to classifying students for special education using RtI, Tier 3 services should never be the sole criteria for eligibility (Gartland & Strosnider, 2020). At the federal and state levels, guidance needs to be provided regarding what other evaluative criteria, including informal measures, should be considered when classifying students for special education (Benedict et al., 2022). Granted, a traditional discrepancy model evaluation is time-consuming, so coming up with an abbreviated process, possibly one that looks at artifacts that are indicators of student strengths and weaknesses that are readily available and collected apart from RtI tiered data, might be considered. This is a timely consideration as school districts are reconsidering the research suggesting the elimination of the discrepancy model. For example, New Jersey is changing the state administrative code embracing the RtI model for classification, and eliminating the discrepancy model (SS2256 ScaSa, 2022). Further, when determining eligibility for classification of students for special education, the criteria must consider other factors to ensure that culturally and linguistically diverse students are not misclassified (Scott et al., 2014). For example, under the discrepancy model, a student might be misidentified with a SLD, when in fact he or she may well be an English Language Learner.

In the end, regardless of how students are identified for services and whether those services are called Prevention, Basic Skills Instruction, RtI, MTSS, Tier 3, or special education, what matters is how effective educators are in improving a student’s overall school success. In light of the recent declines in student performance nationwide on measures of reading and mathematics following the pandemic (National Center for Educational Statistics, 2022), MTSS should be broadly embraced! The use of scientifically proven interventions becomes all the more important in order to assist all students in reaching their fullest potential.

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