

Submission to the National School Reform Agreement's 2023 Review to Inform a Better and Fairer Education System

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Summary

In our submission, we recommend a specific reform to drive improvements in student outcomes, data-based decision-making and accountability in Australia that addresses priority areas one, two and four, within the terms of reference for the Review of the National School Reform Agreement (NSRA). The reform that we recommend is an overarching framework for system improvement known as the Multi-Tiered System of Supports (MTSS). The MTSS framework was developed to enable equity-based system reforms and reduce disparities in academic achievement as well as behavioural and well-being outcomes for students disproportionately affected by special education referrals, disciplinary responses, and disengagement. When implemented with consistency and fidelity at scale across schools and systems, research suggests MTSS can substantially improve student academic outcomes as well as improving behaviour and well-being (priority areas one and two) for *all* students, while reducing disparity and educational disadvantage for those groups disproportionately affected by these. The MTSS framework is also based on data to inform robust decision-making (priority area 4). In our submission, we draw on our recent research on MTSS and highlight that the potential benefits of its implementation at scale lie at the heart of the systemic improvements needed to meet the current and future needs of school students in Australia.

Main submission

This submission has been invited by the NSRA Expert Panel following a presentation by Dr. Kate de Bruin at a stakeholder consultation meeting. That presentation provided an overview of our research on MTSS that was cited within the Consultation Report. We thank the Panel for the opportunity to provide a submission in which we can expand upon that presentation, our research, and its relevance to the NSRA Review's focus and scope. In the sections below, we detail how a national approach can and should be coordinated by using the framework of MTSS to ensure the achievement of the following goals:

- Improvements in learning and well-being
- Reforms that are evidence-based and high-impact
- Data-based decision-making to boost student outcomes

Priority Focus 1: What targets and reforms should be included in the next NSRA to drive real improvements in student outcomes, with a particular focus on students who are most at risk of falling behind and in need of more assistance - for students from low socio-economic backgrounds, regional, rural, and remote Australia, students with disability, First Nations students, and students from a language background other than English?

It is important that the next NSRA recommend targets that can be monitored and reported on for all priority equity students without exception. We contend that this would address a fundamental inequity in Australian education. In their Report on the Review of the NSRA, the Productivity Commission (2022) noted that students from identified priority equity cohorts are three times more likely to fall significantly behind and need more assistance. This highlights how important it is that reforms that are designed to address this disparity can be monitored and provide accountability for their effectiveness. However, the findings of the Productivity Commission (2022) were calculated based on NAPLAN results, and the reported proportion of underachieving students from priority equity is inaccurate because the data forming the NSRA targets is inadequate for the task of monitoring progress.

Targets within the current NSRA cannot be accurately monitored because NAPLAN results are not disaggregated for students with disabilities, meaning that the attainment and

trends for an entire priority equity cohort (the largest minority group in the education system) are unaccounted for. Thus, while it is possible to monitor achievement disparity and achievement trends for priority equity cohorts such as First Nations students, students from a language background other than English, students from low socio-economic backgrounds, and students from regional, rural, and remote Australia, there is inequity in identifying students with disabilities as they are an invisible cohort. This issue has long been the subject of attention within research (e.g., Davies, 2012; Dempsey & Davies, 2013; Teather & Hillman, 2017). Recommendations have been provided to develop and implement a national testing approach that is more inclusive and effective by drawing on the lessons from overseas to ensure all students, including those with the most complex of learning profiles, have opportunities to access the general curriculum, to learn and make adequate yearly progress, and to be included in national testing with appropriate reasonable adjustments (Elliott et al., 2012). The second reason that the targets within the current NSRA cannot be adequately monitored is that each year an unknown number of students with disabilities are exempted or withdrawn from NAPLAN. Not only is the learning of these students unaccounted for, but their progress is also recorded within NAPLAN data as being below minimum standards without ascertaining that this is in fact the case (Australian Curriculum and Assessment Authority, 2023). For these two reasons, ***we suggest that the next NSRA include targets that articulate outcomes that can be measured and monitored for all priority equity cohorts. An important National Priority Initiative would be to ensure that the national testing regime is an inclusive one in which every student's progress is accounted for without exception, including their opportunities to access the curriculum, to make adequate yearly progress, and to demonstrate this through annual assessments in which they access appropriate reasonable adjustments.***

The next NSRA must recommend reforms that are comprehensive and drive improvements for *all* students—those who belong to priority equity cohorts and those who do not. While underachievement disproportionately affects priority equity cohorts, most students not meeting minimum standards do not belong to priority equity cohorts (Productivity Commission, 2022, p. 21). Indeed, according to 2021 data (Productivity Commission, 2022, p. 20-21), of those students across Years 3, 5, 7, and 9 not meeting national minimum standards (NMS) in the National Assessment Program for Literacy and Numeracy (NAPLAN) in at least one of reading or numeracy, less than half of these students were from priority equity cohorts. It is clear that underachievement is a systemic issue and requires a comprehensive and coordinated approach, rather than one that specifies targeted approaches

based on categories of disadvantage. We suggest that the next NSRA should articulate clear reform directions and National Policy Initiatives (NPIs) that are informed by a common framework to ensure that the national approach being recommended is coordinated.

Our systematic review, commissioned by AERO (de Bruin et al., 2022), offers compelling evidence that supports the adoption of MTSS as the preferred common framework, and this is our recommended reform for the next NSRA. In our review, we found that the historical approach of funding and organising additional supports based on categories of disadvantage (priority equity cohorts) does not result in improved outcomes for those students. Moreover, this approach also fails to extend support to those students who may need it but have not been identified within priority equity cohorts. Given that the Productivity Commission identified more than 50% of students who are significantly behind their peers—that is, assessed below national minimum standards—targeted approaches based on categories of disadvantage fail to extend support to the majority of students who actually need it. Our review found that instead, a needs-based approach is more efficient and equitable. This needs-based approach is aligned with the Mparntwe Education Declaration (Department of Education, Skills, and Employment, 2019) and is a feature of the contemporary Australian policy and legislative landscape, such as in the needs-based funding within the Australian Education Act 2013, and is being urged for adoption by the states and territories (Australian National Audit Office, 2017; 2021). More importantly, such a needs-based approach is supported by robust evidence to achieve improved academic and behavioural outcomes for students (de Bruin et al., 2022).

MTSS offers a coordinated approach, meaning that improvements can be achieved for priority equity students within the context of supporting achievement for all, rather than as separate add-ons. MTSS is a proactive and preventative framework for providing quality instruction to all students and support on the basis of need. It is generally characterised by these key components

- A coordinated system of support across a sliding scale of increasingly intensive tiers (usually three)
- The use of evidence-based practices at each tier
- Universal screening of all student's academic progress, behaviour and well-being
- Data-based decision-making for the determination of additional tiers of support
- Progress monitoring to ensure tiered supports are having the desired impact on students

Rather than responding to gaps in achievement, escalating issues of behaviour, or poor well-being in students, MTSS is proactive by providing the highest-quality academic, behavioural and social-emotional instruction to support optimal outcomes across all domains and for all students. The foundation of MTSS is Tier 1, which constitutes the environment and instructional quality across all classrooms and areas of the school. A high-quality Tier 1 approach is designed to effectively provide a positive and engaging learning environment, efficiently teach the widest and most diverse cohort, and foster connection and pro-social interactions between students. These maximise the number of students learning and thriving and minimise the number who require additional support.

An important feature of MTSS is that Tiers 1, 2, and 3 are layered and aligned. Students who receive support at higher tiers do not receive “something different” - rather, they are provided with a more intensive “dose” of high-quality evidence-based academic, social-emotional or behavioural instruction, as provided at Tier 1. Students are regularly screened at Tier 1 for risk indicators of poor outcomes. This data is used, where appropriate, to provide targeted support at Tier 2 for small groups of students who are identified as being at a somewhat elevated risk of poor academic, behavioural or well-being outcomes. Students receiving this targeted Tier 2 support have their progress monitored through more frequent assessments, and this data is used to ensure that they are making adequate progress and ascertain that the support provided is having the desired outcome. More intensive support is offered at Tier 3 to individuals who are at a much higher risk of poor outcomes, and these are similarly monitored for progress. All students receiving targeted or intensive support have a progress goal against which their progress is monitored. This goal is the “exit criteria” at which point it is hoped that they may return to needing only Tier 1 support. The larger the gap in their learning or behaviour, or the poorer their personal well-being, the more sustained their support may need to be.

Our research identified high-quality evidence of successful implementation, integration, and impact of the MTSS framework to address and improve the academic and behavioural progress of underachieving students as well as improve outcomes for *all* students across both schools and systems (de Bruin et al., 2022). Our findings drew on two meta-analyses that collectively showed that when Tier 1 instruction was of high quality, approximately 80% of students made good academic progress and met behavioural expectations at Tier 1 (Burns & Symington, 2002; Burns, Appleton, & Stehouwer, 2005). Tier 2 academic and behavioural interventions proved effective, targeted, and timely, benefiting the majority of the remaining 20% of students. Only a small percentage (6%) of

students required more intensive and personalized support, where Tier 3 provisions supported them using evidence-based support and interventions. Interestingly, the percentage of students referred for special education placement was notably low, at only 1.68%, compared to the national average of 5.7%. This highlights that MTSS benefits individual students by supporting progress, as well as schools by ensuring fewer students require more resource-intensive supports, and systems by ensuring improvements benefit all students and support their inclusion. ***We recommend that the next NSRA consider a target of 80% of students achieving and thriving at school within Tier 1 and adopt the principles of implementation science to achieve this.*** We emphasise that an appropriate time frame to support progress to this point be determined. Research from the field of implementation science (Fixsen & Blase, 2009) suggests that implementing and scaling-up change can take two to four years and given how persistent educational disadvantage has been in Australia, a conservative approach would be to plan stages of implementation carefully and ensure key elements are in place such as technical assistance and a coaching workforce.

Our review found that there were critical factors in the system-wide implementation of MTSS to achieve the positive outcomes described above. One was the value of consistency in achieving reform at scale. Originally, in the United States, reforms were implemented by granting autonomy to the States, allowing them to choose and develop their own approaches to multi-tiered frameworks. As a consequence, this led to inconsistency across states, which adopted varying definitions and models. The diverse set of frameworks across states has created confusion and hindered the widespread adoption and implementation of effective practices, which has taken two decades to turn around. This suggests a crucial lesson for Australia is to establish clear definitions and guidelines for MTSS from the outset. Consistency among states in policy documentation and school guidance is essential to foster a unified and nationally consistent approach. Accordingly, ***it is our strong recommendation for the next NSRA that MTSS be adopted as a national reform and provide definitional and conceptual consistency as well as guidance to inform state policy.***

A second critical factor in the system-wide implementation of MTSS was the creation of technical assistance centres that provided professional learning and implementation resources to guide schools and districts in the implementation of MTSS with fidelity. These centres leveraged the principles of implementation science, an approach that uses scientific principles to ensure the scaling-up of evidence-based practices (Fixsen et al., 2005). Our research found that technical assistance centres in the US have served an essential function in achieving this reform at scale. The most successful of these technical assistance centres began

as partnerships between universities and industry, largely state education departments and school districts, such as the Vanderbilt University Iris Center. One of the most successful National Policy Initiatives from the current NSRA has been the creation of the Australian Educational Research Organisation (AERO), which serves as a technical assistance centre for evidence synthesis and dissemination. *It is our strong recommendation that the NSRA panel consider a National Policy Initiative under an MTSS reform to fund university-industry partnerships to create technical assistance centres that support the scaling up of evidence-based practices in reading, writing, mathematics, behaviour and wellbeing.*

Priority Focus 2: How the next agreement can contribute to improving student mental health and well-being by addressing in-school factors while acknowledging the impact of non-school factors on wellbeing

The next NSRA can contribute to improved mental health and well-being by introducing a comprehensive MTSS framework that supports evidence-based practice in these domains. While external factors beyond the school's control may influence student well-being, with the appropriate resources, schools can implement specific practices for students. A “wrap-around” approach to supporting students serves to provide timely and well-targeted support, thus safeguarding students and mitigating further decline.

In particular, certain factors associated with school practice within an MTSS are key here, such as data-based needs assessments, which facilitate access to early intervention services that are aligned to particular areas of need in individuals. Similarly, MTSS approaches to trauma-informed care in school have also been identified to support student mental health improvements (Maynard et al., 2019). Within an MTSS that is comprehensive and extends to mental health and wellbeing, a collaborative team of school staff, including teachers, school psychologists, and others, along with caregivers and the students themselves, makes timely, data-based decisions regarding appropriate intervention. Clear intervention goals are determined, and progress monitoring is regularly monitored as often as required, e.g., daily, bi-weekly, or weekly. Interventions are time bound with clear entry and exit criteria for when students will no longer need support.

Some Australian jurisdictions are already moving towards school-wide implementation of student mental health and well-being initiatives. For example, the Victorian Government developed and piloted the Mental Health and Wellbeing Coordinator (MHWC) model from

2020-21 to provide more mental health support in primary schools. The role of the MHWC is to build the capability of the whole school regarding mental health and wellbeing (identification, promotion, and prevention), to provide support to staff to better identify and support students with mental health needs, to establish clear pathways for referral for students requiring assessment and intervention, and to monitor and evaluate student progress; it is also designed to help build bridges between the education and health sectors (Smith et al., 2023). Under the MTSS framework, initiatives such as the MHWC model would be integrated into the Victorian Government's MHWC model initiative, through data-based decision-making related to program improvement, high-quality instruction and intervention, social and emotional learning, and positive behavioural supports necessary to ensure positive outcomes for districts, schools, teachers, and students. MTSS can contribute to improving Australian students' mental health and well-being by addressing in-school factors that may affect their mental health, such as academic and behavioural challenges, and absenteeism (Fuchs & Fuchs, 2006; Runge et al., 2017).

We advocate for universal behavioural, social, and emotional screening and access to intervention for all students within an MTSS framework as a component of reform in the next NSRA.

Priority Focus 4: How data collection can best inform decision-making and boost student outcomes

Our research (de Bruin et al, 2022) found that data-based decision-making is a cornerstone of MTSS and a critical component of improving outcomes. MTSS frameworks prioritise early identification and interventions and use a wide range of summative, formative, student, teacher- and family-informed data to identify student needs early, thus providing a student profile that provides data for educators to develop targeted support planning for students (Jimerson et al., 2016). The use of data is central to the MTSS model, where data from multiple assessments can be applied to plan tiered instruction that meets the needs of students. To support educators, ongoing professional learning to effectively analyse MTSS screening, progress monitoring, and implementation data and use that data to make decisions about instruction and implementation is crucial.

Formative and summative evaluation procedures are necessary to make decisions about student intervention/instruction using scientifically validated assessments for screening, diagnostic, and progress monitoring purposes (Harlacher et al., 2014). Educators and school teams can use screening and progress monitoring data to make decisions about instruction, which can support students by ensuring they scaffold them before student data identifies potential or actual failure. This is a significant shift from delaying interventions that rely primarily on “wait and see” approaches to supporting students. The “wait and see” approach to responding to student needs can be detrimental to student progress and wellbeing, as it may lead to further academic and wellbeing struggles. Data-based interventions are necessary to ensure that all students are supported. A collaborative, problem-solving approach by a team of school staff (with parents and others), using data-based decision making to address student needs, and support classroom teachers to provide high quality teaching. For example, reading interventions would apply universal screening, diagnostic assessments, progress monitoring, and formative assessments to identify, predict, and support students who are underachieving, at-risk, or in need of reading support (Harlacher et al., 2014). Data based interventions thus serve educators to identify, plan, and justify the levels of intensification of instruction for priority cohort students, including students with disabilities. Within the MTSS framework, using data to identify student needs, plan interventions, and monitor progress, educators can tailor instruction and support to meet the diverse needs of students, leading to improved outcomes.

The development of locally derived cut scores would give jurisdictions and schools greater flexibility to determine decision rules around intervention, such as who requires Tier 2 intervention. School districts or regions could work together to determine local cut scores with diagnostic accuracy. An MTSS framework would allow consistent management of this flexible data-based decision-making process.

Conclusion

Our submission highlights that an MTSS framework rolled out at scale across jurisdictions can provide for all schools:

- A clear road map for improvement based on two decades of evidence-based implementation data;
- A coordinated system to identify, understand, and address the needs of all students at risk of poor academic, behavioural, and social and emotional outcomes.

- Timely universal screening and progress monitoring to understand the learning needs of students.
- A collaborative, problem-solving approach by a team of school staff (with parents and others), using data-based decision making to address student needs, and support classroom teachers to provide high quality teaching.
- A means by which evidence-based human and physical resources can be allocated according to student need.

We hope that the NSRA review panel consider and adopt our recommendations for targets, reforms, and policy initiations to achieve these benefits for students and the system.

References

- Australian Curriculum and Assessment Authority. (2023) NAPLAN National Protocols for Test Administration. <https://www.nap.edu.au/docs/default-source/default-document-library/naplan-national-protocols-for-test-administration-2023.pdf>
- Australian Education Act (Cth) (2013). <https://www.legislation.gov.au/Details/C2020C00142>
- Australian National Audit Office (2017), *Monitoring the Impact of Australian Government School Funding (Final Report)*. <https://www.anao.gov.au/work/performance-audit/measuring-impact-australian-government-school-funding>
- Australian National Audit Office. (2021). *Monitoring the impact of government school funding—Follow-up. Auditor-General Report No. 37 of 2020–21*. Department of Education, Skills, and Employment, Australian National Audit Office, Commonwealth of Australia 2021. <https://www.anao.gov.au/work/performance-audit/monitoring-the-impact-government-school-funding-follow-up>
- Burns MK, Appleton, JJ and Stehouwer JD (2005). Meta-analytic review of responsiveness-to-intervention research: Examining field-based and research-implemented models. *Journal of Psychoeducational Assessment*, 23(4):381-394. <https://doi.org/10.1177/073428290502300406>
- Burns M.K. and Symington T. (2002). A meta-analysis of prereferral intervention teams: Student and systemic outcomes. *Journal of School Psychology*, 40(5):437-447. [https://doi.org/10.1016/S0022-4405\(02\)00106-1](https://doi.org/10.1016/S0022-4405(02)00106-1)
- Centre for Education Statistics and Evaluation (2020). *Local Schools, Local Decisions Evaluation Final Report*, NSW Department of Education, www.cese.nsw.gov.au
- Council of Australian Governments (COAG). (2019). *Alice Springs (Mparntwe) 2019 Education Declaration*. Education Services Australia. www.educationcouncil.edu.au
- Davies, M. (2012). Accessibility to NAPLAN assessments for students with disabilities: A ‘fair go’. *Australasian Journal of Special Education*, 36(1), 62-78. <https://doi.org/10.1017/jse.2012.7>
- de Bruin, K., Kestel, E., Francis, M., Forgasz, H., & Fries, R. (2023). *Supporting Students Significantly Behind in Literacy and Numeracy: A Review of Evidence-Based Approaches*. <https://www.edresearch.edu.au/sites/default/files/2023-05/aero-supporting-students-significantly-behind-literacy-numeracy.pdf>
- Dempsey, I., & Davies, M. (2013). National test performance of young Australian children with additional educational needs. *Australian Journal of Education*, 57(1), 5-18. <https://doi.org/10.1177/00049441124687>

- Department of Education, Skills and Employment. (2019). *Alice Springs (Mparntwe) Education Declaration*. <https://www.dese.gov.au/alice-springs-mparntwe-education-declaration>
- Elliott, S. N., Davies, M., & Kettler, R. J. (2012). Australian students with disabilities accessing NAPLAN: Lessons from a decade of inclusive assessment in the United States. *International Journal of Disability, Development, and Education*, 59(1), 7-19. <https://doi.org/10.1080/1034912X.2012.654934>
- Fixsen, D. L., Naoom, S. F., Blase, K. A., Friedman, R. M., & Wallace, F. (2005). *Implementation research: a synthesis of the literature*. Tampa, FL: University of South Florida, Louis de la Parte Florida Mental Health Institute, The National Implementation Research Network (FMHI Publication# 231). <https://nirn.fpg.unc.edu/resources/implementation-research-synthesis-literature>
- Fixsen, D. L., & Blase, K. A. (2009). *Implementation Brief Number 1: The Missing Link between Research and Practice*. Frank Porter Graham Child Development Institute. University of North Carolina <https://eric.ed.gov/?id=ED507422>
- Fuchs, D., & Fuchs, L. S. (2006). Introduction to response to intervention: What, why, and how valid is it? *Reading Research Quarterly*, 41(1), 93-99. <https://doi.org/10.1598/RRQ.41.1.4>
- Harlacher, J. E. (2014). *Practitioner's guide to curriculum-based evaluation in reading* (1st ed.). Springer. <https://doi.org/10.1007/978-1-4614-9360-0>
- Jimerson, S. R., Burns, M. K., & VanDerHeyden, A. M. (Eds.). (2016). *Handbook of Response to Intervention: The Science and Practice of Multi-Tiered Systems of Support* (pp. 1-6). New York, NY: Springer.
- Lawrence, D., Hafekost, J., Johnson, S. E., Saw, S., Buckingham, W. J., Sawyer, M. G., . . . Zubrick, S. R. (2016). Key findings from the second Australian child and adolescent survey of mental health and wellbeing *Australian & New Zealand Journal of Psychiatry*, 50(9), 876-886. <https://doi.org/10.1177/0004867415617836>
- Maynard, B. R., Farina, A., Dell, N. A., & Kelly, M. S. (2019). Effects of trauma-informed approaches in schools: A systematic review. *Campbell Systematic Reviews*, 15(1-2), e1018. <https://doi.org/10.1002/cl2.1018>
- Productivity Commission. (2022). *Review of the National School Reform Agreement: Study Report*. Commonwealth of Australia.
- Runge, T. J., Knoster, T. P., Moerer, D., Breinich, T., & Palmiero, J. (2017). A practical protocol for situating evidence-based mental health programs and practices within

school-wide positive behavioral interventions and supports. *Advances in School Mental Health Promotion*, 10(2), 101-112. <https://doi.org/10.1080/1754730x.2017.1285708>

Smith, R., Darling, S., Francis, M., Habgood, E., Dawson, G., Quach, J., & Oberklaid, F. (2023). *Mental health in primary schools: Final Evaluation Report 2022*. Murdoch Children's Research Institute, Melbourne, Australia.

Teather, S., & Hillman, W. (2017). The invisible students with disabilities in the Australian education system. *Equality, Diversity and Inclusion: An International Journal*, 36(6), 551-565. <https://doi.org/10.1108/EDI-02-2017-0029>

US Department of Education (n.d.). *Results-Driven Accountability*. <https://www2.ed.gov/about/offices/list/osers/osep/rda/index.html>