NO. 84362-7

SUPREME COURT OF THE STATE OF WASHINGTON

MATHEW and STEPHANIE McCLEARY, et al.,

Respondents,

v.

STATE OF WASHINGTON,

Appellant

.

AMICUS CURIAE MEMORANDUM OF THE ARC OF KING COUNTY, THE ARC OF WASHINGTON STATE, TEAMCHILD, WASHINGTON AUTISM ALLIANCE & ADVOCACY, OPEN DOORS FOR MULTICULTURAL FAMILIES, SEATTLE SPECIAL EDUCATION PTSA, BELLEVUE SPECIAL NEEDS PTA, GARY STOBBE, M.D., JAMES MANCINI AND REP. GERRY POLLET

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I. INTRODUCTION

For 130,000 children with disabilities, the actual cost of basic education is *still* not fully funded as constitutionally required. Although the State finally budgeted for certain educational reforms promised in 2009, that does not satisfy the paramount duty in article IX, section 1. On the contrary, EHB 2242 (Laws of 2017, 3d Sp. Sess., ch. 13) exacerbates or creates funding problems while attempting to solve others. Accordingly, this Court should retain jurisdiction in order to enforce the constitutional mandate to amply provide for the education of all children.

On its face, EHB 2242 continues to underfund the individualized educational services required by federal law for children with disabilities.[1] It maintains an unconstitutional cap on the percentage of children in each school district who may receive state funding for special education.[2] EHB 2242 also underfunds special education by providing less than one instructional assistant for each school, while at the same time restricting use of local levy money to fill gaps in necessary staffing.[3] These stark problems are compounded by an outdated cost formula that assumes every student with disabilities needs 1.93 times as much state funding as a student without disabilities when, in reality, some children's needs are

[1] 20 U.S.C. 1414(d)(3) (requiring individual education plans based on unique needs).
[2] Laws of 2017, 3d Sp. Sess., ch. 13, §406(2)(b) and (3)(d).
[3] Laws of 2017, 3d Sp. Sess., ch. 13, §402(3)(b) and (5) and §501(1)(a) and (2)(b).

much greater than others. The underfunding results in poor outcomes including dismal graduation rates, as discussed below.

Despite years of $100,000-per-day sanctions and multiple orders to achieve ample provision for basic education, the State still misses the overarching point of this Court's 2012 ruling that "a level of resources that falls short of the actual costs" is *not* sufficient. *McCleary v. State*, 173 Wn.2d 477, 547. Moreover, the State forgets that "no child is excluded" from the mandate. *Id*. at 520. By excluding children with disabilities from reforms, the State is denying a particularly vulnerable group the opportunity to obtain the knowledge and skills needed for college, employment and citizenship. This continued underfunding of special education, a component of basic education, is unconstitutional. Accordingly, this Court should hold that the State's work is not done.

II. INTEREST OF AMICI

The participants in this brief ("Amici") are advocates for children with disabilities. They submit this brief pursuant to RAP 10.6 and this Court's August 24, 2017 Order.

The Arc of Washington is a statewide non-profit organization which advocates for the rights and full participation of all people with intellectual and developmental disabilities. The Arc of King County is an

affiliated chapter of the Arc of Washington advocating for individuals with developmental disabilities to thrive as equal, valued and active members of the community. TeamChild, a non-profit civil legal advocacy program for low-income children at risk of or involved with the juvenile justice and child welfare systems, helps youths access their basic rights to education as well as health care, housing and other social services. Washington Autism Alliance & Advocacy is a nonprofit organization dedicated to helping children with autism and other disabilities to thrive and become productive members of society. Open Doors for Multicultural Families is a non-profit organization dedicated to ensuring that families who have members with developmental disabilities and special health care needs have equal access to culturally and linguistically appropriate information, resources and services. The Seattle Special Education PTSA and Bellevue Special Needs PTA are non-profit groups of parents, educators and community members dedicated to supporting students with disabilities in their communities. Gary Stobbe, M.D., and James Mancini, a speech and language pathologist, work with families at the Seattle Children's Autism Center. Rep. Gerry Pollet (46th District) is the father of a special education student, has served on the House Education Committee, and made a floor speech about the failure of EHB 2242 to fully fund special education.

Amici have a strong interest in enforcing the full funding requirement of article IX, section 1 so that all children will have the same opportunity to learn, graduate, get jobs and contribute to society. Amici are gravely concerned that the 2017 legislation leaves major holes in special education funding that will harm children with disabilities throughout the state, particularly in the 90 school districts whose special education populations exceed the state's funded enrollment levels. Amici also worry that new restrictions on local levy spending, coupled with underfunding by the state, will unconstitutionally restrict districts from meeting the needs of every student entitled to special education services.

III. ARGUMENT

A. Special Education Is Part of This Case.

The State has argued that this case is not concerned with special education. *See*, e.g., State of Wash. Memorandum Transmitting the Legislature's 2017 Post-Budget Report ("2017 Memo"), p. 6 (only implementation of 2009 reforms, which focused on other components of basic education, is before this Court); Reply (June 17, 2016), p. 3 (special education concerns "are more properly raised in a new complaint"). The State's recent 34-page brief barely mentioned special education except to note that it is still "part of 'basic education'" (2017 Memo, p. 4), assert

that salary increases will help special education (*Id*., p. 20), and vaguely acknowledge the cap on students receiving state funding for special education (*Id.*, p. 22).[4] The State has not defended the cap or other deficiencies in special education funding, wrongly arguing that this Court is deferring to the Legislature's 2009 decision to reform other funding problems but not special education. 2017 Memo, pp. 1 and 3, quoting *McCleary*, 173 Wn.2d at 484 ("if fully funded," the 2009 law, ESHB 2261, "will remedy deficiencies in the K-12 funding system").

Respectfully, Amici disagree that this Court intended to defer, or should defer, to the Legislature when it comes to excluding certain children from full funding of basic education. Just because special education was not targeted in 2009 reforms does not mean it is forever shielded from constitutional scrutiny, or that children with disabilities must wait for another opportunity to seek this Court's protection of their basic rights. On the contrary, this Court committed to monitor not just implementation of 2009 reforms but "more generally, the State's compliance with its paramount duty." *McCleary,* 173 Wn.2d at 545-546. Moreover, this Court recognized that special education is a component of

[4] The State avoids the word "cap" although it cuts off special education funding once a school district enrolls more than 13.5 percent of K-12 students in special education. Laws of 2017, 3d Sp. Sess., ch. 13, §406(2)(b) and (3)(d).

the constitutionally required basic education and, as such, it must receive "fully sufficient" funding from the state. *Id*. at 526-527.

Contrary to the State's arguments, this Court never said the 2009 reform bill would remedy *all* deficiencies. *Id*. at 484.[5] Rather, this Court has repeatedly warned that the State cannot declare "full funding" when the *actual costs* of meeting education rights remain unfunded. January 9, 2014 Order, p. 4, citing *McCleary*, 173 Wn.2d at 532. That applies equally to students with disabilities. *McCleary* at 520-521 (affirming that "All children" under article IX, section 1 encompasses "each and every child since each will be a member of, and participant in, this State's democracy, society and economy"). Moreover, even though ESHB 2261 did not seek to reform special education, it did include "an appropriate education…for all eligible students with disabilities" as part of the "minimum instructional program of basic education" required by RCW 28A.150.220 and article IX, section 1. Laws of 2009, ch. 548, §104(1) and (3)(f).[6] Therefore, even assuming the State is correct that this Court is concerned solely with implementation of ESHB 2261, special education must be viewed as part of the 2009 promise to fully fund basic education.

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[5] Under the State's reasoning, this Court's orders regarding physical capacity for lower class sizes would also fall outside continuing jurisdiction – clearly not the case.

[6] ESHB 2261 proclaims that special education is "fully funded" by RCW 28A.150.390. Laws of 2009, ch. 548, §105(2). But this Court has rejected the argument that "full funding is whatever the Legislature says it is." *McCleary*, 173 Wn.2d at 531-32.

The State has asserted that Amici seek to "re-litigate" the issues in *School Districts' Alliance for Adequate Funding of Special Education v. State*, 170 Wn.2d 599 (2010). Reply (June 17, 2016), p. 3. But that case did not establish that special education funding is sufficient, nor address the lawfulness of the funding cap. Rather, the Alliance took the position that basic education was fully funded and challenged only the 2005 excess cost allocations for special education. 170 Wn.2d at 610. This Court held that basic education and special education allocations are "utterly intertwined" and that, by focusing only on the latter, the districts failed to prove underfunding beyond a reasonable doubt. *Id*. at 611. That was two years before *McCleary* found basic education funding deficient, and expressly did *not* decide "the proper constitutional lens through which to examine positive rights, generally, or the mandate of article IX in particular." *School Dist. Alliance*, 170 Wn.2d at 616 (J. Stephens concurrence). In sum, nothing in this Court's decisions justifies the State's position that special education funding is not part of this case.

B. <u>The Funding Cap for Special Education is Unconstitutional.</u>

This Court has identified two parts to the constitutionally required basic education in Washington: 1) an opportunity to obtain the knowledge and skills described in *Seattle School Dist. No. 1 v. State*, 90 Wn.2d 476

(1978), ESHB 1209 (Laws of 1993, ch. 336), and the Essential Academic Learning Requirements; and 2) "fully sufficient" funding "by means of dependable and regular tax sources" of the State. *McCleary*, 173 Wn.2d at 525-528. This means all Washington students must have the opportunity to learn how to read with comprehension; write with skill; communicate effectively; know and apply core concepts of math, sciences, civics, history, geography, arts, health and fitness; think analytically, logically and creatively; make reasoned judgments and solve problems; and understand the importance of work and how student performance, effort and choices affect career and college opportunities. Laws of 1993, ch. 336, §101; *McCleary*, 173 Wn.2d at 492. This also means the State may not rely on federal or local funding to amply provide for education. As this Court explained, "Reliance on levy funding to finance basic education was unconstitutional 30 years ago in *Seattle School District*, and it is unconstitutional now." *McCleary*, 173 Wn.2d at 539.

The cap on special education funding violates this mandate. Under EHB 2242, the latest bill imposing a cap, the State provides a basic allocation for each student and an "excess" allocation for each student enrolled in special education (93 percent of the basic allocation) – but refuses to pay the latter for more than 13.5 percent of any school district's

K-12 enrollments. Laws of 2017, 3d Sp. Sess., ch. 13, §406(2)(b) and (3)(d) (explaining "funded enrollments") and §402(11) (adhering to the special education formula in RCW 28A.150.390). This is, on its face, unconstitutional because it excludes certain children – those with disabilities living in school districts with more than 13.5 percent of K-12 students enrolled in special education – from funding which the State has deemed necessary to cover basic education costs. To put it another way, the State is intentionally underfunding special education in districts which have the greatest need for special education funding. This violates both prongs of the constitutional test: 1) by denying specially designed services to some children who need them due to disabilities, the cap deprives those children of the opportunity to gain the knowledge and skills needed for college, work and citizenship; and 2) by cutting off special education funding based on where students live, the State is not providing regular and dependable funding for all districts to cover all costs of educating all children with disabilities. *McCleary*, 173 Wn.2d at 547.

Under the Individuals with Disabilities in Education Act (IDEA), 20 U.S.C. 1414(d), school districts do not have the option of denying special education to students who qualify. Districts must proactively identify all students with disabilities who are eligible for special education.

20 U.S.C. 1412(a)(3) (the "child find" duty). Once deemed eligible, each child with a disability is entitled to an "individualized education plan" outlining appropriately ambitious goals for educational and functional development and the accommodations and services needed to master those goals. 20 U.S.C. 1414(d); *Endrew F. v. Douglas County Sch. Dist.*, 137 S. Ct. 988, 1000-1001 (2017). What is appropriate is highly variable and "turns on the unique circumstances of the child," with an eye toward making progress in the general curriculum. *Endrew F*. at 1001. Thus, each school district must provide a unique special education to every child who is eligible, even if the State refuses to pay for it.

EHB 2242 raised the State's cap on special education funding from 12.7 percent to 13.5 percent of each district's K-12 enrollment. Laws of 2017, 3d Sp. Sess., ch. 13, §406(2)(b) and (3)(d). While that helped about 30 districts, according to the latest State data, there are still 90 school districts exceeding the maximum funded percentage of special education students.[7] As a result, ***nearly 2,000 students*** with disabilities around the

[7] The State most recently reported the percentage of special education students in each school district in February 2017 at http://www.k12.wa.us/SAFS/Misc/ApportionmentNotes.asp. To find the actual percentage in each school district, click on "January 2016-17 Special Ed Rate" (the last link under the heading "2016-17 Attachments"). This will open an Excel file entitled "2016-17 Special Ed Rate Calculation." Then go to the first worksheet (clicking on the bottom tab labeled "Special Ed Rate Calc"), and choose a district from the drop-down menu on line 5. Then, for each district, go to the "District Specific" tab and look on line 35, which shows the percentage of K-12 students enrolled in special education.

state are excluded from special education funding by the cap. See "January 2016-17 Special Ed Rate," published by the State at http://www.k12.wa.us/SAFS/Misc/ApportionmentNotes.asp, and FN6. The largest numbers of students excluded from state funding are: 322 in Spokane, 73 in Granite Falls, 66 in Aberdeen, 60 each in Ferndale, Cheney and Centralia, 58 in Central Kitsap, 56 in Ocean Beach and Mount Baker, 55 in the Lummi Tribal Agency, 53 in Enumclaw, 48 in Marysville and 46 in Bremerton. *Id*. Native American communities are especially hard-hit by the cap, with 36 percent of students enrolled in special education in Quileute and in the Suquamish Tribal Education agency, 32.5 percent in the Lummi Tribal Agency and 19 percent in Taholah on the Quinalt reservation. *Id*. Larger districts with high rates of special education enrollments include Hoquiam and Castle Rock (16 percent) and Centralia, LaConner and Port Townsend (15 percent).

When the state refuses to pay the "excess" allocation for a special education student, the district receives only enough for the student's participation in general classrooms without any special instruction or services. By contrast, an excess allocation can pay for such common supports as instructional assistants, speech therapy, behavior specialists, physical and occupational therapy, counseling and assistive technology.

WAC 392-172A-01155(1) and -01185. Without excess allocations, the district must either spend levy money to provide necessary services or deny an appropriate education in violation of federal law. Either way, the child's right to full *state* funding of basic education is denied. *McCleary*, 173 Wn.2d at 537 (the State violates article IX, section 1 when its allocations fall short of actual costs); RCW 28A.150.220(3)(f).

C. The New Levy Restrictions Create New Problems.

EHB 2242 addresses this Court's concerns about levy reliance by prohibiting school districts from spending levy revenues on basic education after September 1, 2019. Laws of 2017, 3d Sp. Sess., ch. 13, §501(1)(a). Levies may be used only for certain "enrichment" activities that supplement the minimum instructional offerings of RCW 28A.150.220 or the "staffing ratios or program components" of RCW 28A.150.260. *Id*. §501(2)(a). Special education is *not* "enrichment." *Id*. §501(2)(b). Rather, enrichment includes extracurricular activities, extended school days or years, additional courses and early learning. *Id*. Thus, levies can no longer fill gaps in special education funding due to the enrollment cap or the one-size-fits-all excess allocation formula. *Id*.

This ignores the reality that school districts routinely rely on levies for special education because the existing "excess" allocation per student

is inadequate. According to the State, school districts spent $266 million more on special education in the 2014-15 school year than they received from the state's special education and "safety net" funding. Sup't of Public Instruction's Amicus Curiae Brief In Response to the Court's Order Dated July 14, 2016, p. 7 and Appendix C. Despite this known shortfall, the Legislature did not increase the per-student allocation for special education, which is still 93 percent of the allocation for general education. Laws of 2017, 3d Sp. Sess., ch. 13, §402(11); RCW 28A.150.390(2)(b). Moreover, the biennial spending plan increased special education funding by only $22.6 million, less than for any other "categorical" program and not nearly enough to close the traditional $266 million annual gap.[8] Thus, if levy spending for special education over the next two years matches the 2014-15 rate, the State's funding formula will fall short of actual spending by ***over $500 million*** statewide. When the levy restrictions kick in for the 2019-20 school year, school districts will have no way to make up for the staggering shortfall.

The projected gap is particularly acute in Seattle Public Schools, where Superintendent Larry Nyland wrote in an August 7, 2017 letter to staff and families about EHB 2242:

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[8] *2017 Report to the Washington State Supreme Court by the Joint Select Committee on Article IX Litigation*, p. 13 (listing planned funding increases for various components of basic education).

> Education revenue from the state and what the district will be permitted to raise locally will fall short of what we currently spend on education to date…
>
> One example of our dilemma is in special education. The state's new funding formula will provide $16 million in projected 'new revenue' for special education through increased property taxes paid to the state. At the same time our local levy collection will be restricted to $2,500 per student. *Currently we invest close to $60 million from our local levies in special education. Even with new funding from the state, we will be left with a $40-50 million dollar annual gap for special education services* and forced to look for additional funding from other critical areas or use our reduced local levy to pay for the same program and services that we have in place today.
>
> This is just one example of how the Legislature's plan both underfunds basic education services, but also ties our hands and restricts us from sustaining our current level of support to students.

(Italics added).[9] In sum, while the Legislature may have finally funded the education reforms promised in 2009, it has created new problems by prohibiting levy spending for basic education without providing the necessary state funding to fill the gap. Because EHB 2242 is not the final solution it is touted to be, this Court should retain jurisdiction and order additional solutions.

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[9] *See* http://www.seattleschools.org/cms/One.aspx?portalId=627&pageId=26770232. *See also* page 3 of Seattle's analysis of EHB 2242 impacts: http://www.seattleschools.org/UserFiles/Servers/Server_543/File/District/Departments/Budget/2019%20Budget%20Development/Initial%20Analysis%20EHB2242%20FY18-19.pdf.

D. The State Fails to Meet Staffing Needs of Students With Disabilities.

In Washington, 60 percent of special education instruction is delivered by para-educators rather than certificated teachers, according to the January 7, 2016 report to the Legislature by the State of Washington Professional Educator Standards Board's Para-educator Work Group. See: https://drive.google.com/file/d/0B4PrGgwx2LerbGhtMWQ4c2hiaGs/view?pref=2&pli=1, page 21. Yet under RCW 28A.150.260(5), the State pays for less than one classified instructional employee per school: 0.936 of a staff person at each elementary school, 0.7 of a staff person at each middle school and 0.652 of a staff person at each high school. EHB 2242 did not increase these numbers. Laws of 2017, 3d Sp. Sess., ch. 13, §402(3)(b) and (5). This staffing level fails to meet the well-documented need for para-educators to assist students with disabilities, including those eligible for special education and those who need only accommodations.

E. The State Is Neglecting The Needs of Special Education Students.

The chronic underfunding of special education in Washington is harmful to students. Illustrating the problem, on June 28, 2017, the U.S. Department of Education ordered the State to improve its compliance with the IDEA and cited concerns about poor outcomes and practices for

Washington's special education students.[10] The Department considered, among other data, that students with disabilities (those without intellectual disabilities requiring alternate testing) passed general statewide assessments at much lower rates than Washington students as a whole in the 2015-16 school year.[11] For example, proficiency in reading was achieved by 58 percent of all fourth-graders but only 23 percent of fourth-graders with disabilities, and by 61 percent of all eighth-graders but only 14 percent of eighth-graders with disabilities. Similarly, proficiency in math was achieved by 56 percent of all fourth-graders but only 24 percent of fourth-graders with disabilities, and by 49 percent of all eighth-graders but only 9 percent of eighth-graders with disabilities.

Meanwhile, the State reported a four-year graduation rate of only 58 percent for special education students in 2016, compared to 82 percent for Washington students not in special education."[12] If this trend continues, two out of five special education students in Washington will never obtain high school diplomas.

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[10] *See* June 28, 2017 letter from Ruth Ryder, acting director of the U.S. Department of Education Office of Special Education Programs, to Chris Reykdal, State Superintendent of Public Instruction, at: https://sites.ed.gov/idea/files/wa-aprltr-2017b.pdf.

[11] *See* https://osep.grads360.org/#report/apr/2015B/publicView?state=WA and click on the link for "WA-datadisplay-2017b" under the heading "OSEP Response to FFY15 SPP-APR." Assessment data is on page 8.

[12] *See* http://www.k12.wa.us/DataAdmin/PerformanceIndicators/GraduationRates.aspx. Click on the "Gap" tab, then choose "Special Education" from the Group Filter menu.

The State also reported that, among Washington's 2015 high school graduates, only 26 percent of special education students went on to college. By comparison, among 2015 graduates not in special education, 63 percent enrolled in colleges – more than double the rate for students with disabilities.[13] Abysmally, eleven school districts – including Aberdeen, Bremerton and Port Angeles - sent less than a tenth of special education students in the Class of 2015 to college, according to the State's data.[14] In the Evergreen School District in Clark County (one of Washington's largest districts), a mere 8 percent of 2015 graduates in special education went to college. *Id*.[15]

These grim statistics illustrate the importance of fully funding special education in Washington. As long as the State refuses to pay the actual costs of educating students with disabilities, those students will continue to be at a disadvantage in preparing for college, work and citizenship. While most students receive a meaningful opportunity to learn how to read, write and communicate effectively, think creatively and

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[13] *See* http://k12.wa.us/DataAdmin/PerformanceIndicators/PostsecondaryEnrollment.aspx. Click on the "Gap" tab, then choose "Special Education" from the Group menu.

[14] *See* http://k12.wa.us/DataAdmin/PerformanceIndicators/PostsecondaryEnrollment.aspx. Click on the "Performance Data" tab, then choose "Special Education" from the Group menu.

[15] Only a few school districts prepared a majority of their special education students for post-secondary enrollment: Bainbridge Island (69 percent), Mercer Island (58 percent), Lake Washington (54 percent), Issaquah (53 percent) and Bellevue (52 percent). *Id*.

analytically, problem-solve and prepare for careers, that constitutional promise remains unmet for too many students in special education. For these reasons, it is imperative that this Court maintain jurisdiction and ensure that no students are left out of State reforms.

IV. CONCLUSION

For the foregoing reasons, this Court should retain jurisdiction in this case and require the State to fully fund special education as a component of basic education.

Dated this 30th day of August 2017.

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